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No. 101960-2

**IN THE SUPREME COURT
OF THE STATE OF WASHINGTON**

JUDITH ZIMMERLY, JERRY NUTTER, and
NUTTER CORPORATION,

Petitioners-Appellants,

v.

COLUMBIA RIVER GORGE COMMISSION, CLARK
COUNTY, FRIENDS OF THE COLUMBIA GORGE,
JODY AKERS, PAUL AKERS, DANNY GAUDREN,
KATHEE GAUDREN, RACHEL GRICE, ZACHARY
GRICE, GREG MISARTI, EDMOND MURRELL,
KIMBERLY MURRELL, RICHARD J. ROSS, KAREN
STREETER, SEAN STREETER, and ELEANOR WARREN,

Respondents-Appellees.

**ANSWER OF RESPONDENTS-APPELLEES
FRIENDS OF THE COLUMBIA GORGE, JODY
AKERS, PAUL AKERS, DANNY GAUDREN, KATHEE
GAUDREN, RACHEL GRICE, ZACHARY GRICE,
GREG MISARTI, EDMOND MURRELL, KIMBERLY
MURRELL, RICHARD J. ROSS, KAREN STREETER,
SEAN STREETER, and ELEANOR WARREN TO
BIAW'S AMICUS BRIEF**

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I. INTRODUCTION

The Amicus Curiae Brief (“Amicus Brief”) of the Building Industry Association of Washington (“BIAW”) is not helpful to the Court in deciding whether to grant discretionary review in this appeal, and it only confuses and obscures the issues in the appeal.

The Amicus Brief ignores or overlooks the criteria of RAP 13.4(b) governing whether this Court should grant discretionary review. It improperly raises new issues that are not involved in this appeal. And it fails to acknowledge that its arguments would have this Court overrule well-established case law involving the Columbia River Gorge National Scenic Area (“National Scenic Area”). For these reasons, this Court should reject the arguments made in the Amicus Brief.¹

¹ Respondents-Appellees Jody Akers, Paul Akers, Danny Gaudren, Kathee Gaudren, Rachel Grice, Zachary Grice, Greg Misarti, Edmond Murrell, Kimberly Murrell, Richard J. Ross, Karen Streeter, Sean Streeter, and Eleanor Warren (collectively, “Neighbors”) and Friends of the Columbia Gorge (“Friends”) also adopt all legal arguments and statements of fact in the

II. RESPONSE TO BIAW'S STATEMENT OF IDENTITY AND INTEREST

The BIAW explains that it “represents more than 8,000 members of the home building industry.” (Amicus Br. at 7.) It also alleges that its interests involve “residential construction,” an alleged “shortage of homes” in Washington state, and alleged “additional costs” for building homes “related to overregulation and permitting delays.” (*Id.* at 8.)

None of those issues are involved in this appeal. Rather, this appeal involves an enforcement action brought by Clark County against Jerry Nutter, Nutter Corporation (collectively “Nutter”), and Judith Zimmerly (“Zimmerly”), for conducting mining operations in the National Scenic Area without required mining permits. The types of permits that the BIAW complains about are different than the permits needed for a mining operation in Clark County’s portion of the National Scenic Area.

Answer of the Columbia River Gorge Commission (“Gorge Commission” or “Commission”) to the BIAW’s Amicus Brief.

This appeal has nothing to do with permits needed for residential construction—not in the National Scenic Area nor anywhere else in the State of Washington. Furthermore, nothing about this appeal has caused any permitting delays.² Thus, these issues and concerns raised by the BIAW are not present in this appeal.

III. ARGUMENT IN RESPONSE

A. The BIAW fails to address the criteria of RAP 13.4(b) governing discretionary review.

RAP 13.4(b) contains the criteria governing whether this Court should grant discretionary review. The BIAW’s Amicus Brief fails to address these criteria.

In fact, the BIAW never even asks this Court to grant discretionary review. Instead, the BIAW skips over that threshold question and proceeds to its ultimate desired disposition of the appeal, urging this Court to “reverse the Commission’s final decision and reinstate the Clark County

² These distinctions will be further explored below, *infra* § III.B.

Examiner’s decision.” (Amicus Br. at 15; *see also id.* at 6.) The Amicus Brief is effectively a merits brief, rather than a brief on whether this Court should grant review (the question currently pending before the Court).

Perhaps the BIAW skipped over the applicable criteria of RAP 13.4(b) because it was unable to make any argument under these criteria as to whether the BIAW believes the Court should grant review. Whatever the reason, the Amicus Brief does not offer a single basis for the Court to grant review. None of the issues raised in the Amicus Brief meet the RAP 13.4(b) criteria—whether or not those criteria were cited or applied in the Brief.

Ultimately, the Amicus Brief is not helpful to the Court in deciding whether to grant review. This Court should deny review for the reasons already stated by Friends, Neighbors, and the Gorge Commission in answer to the Petition for Review.

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B. The BIAW improperly raises new issues that are not involved in this appeal.

As Friends and Neighbors previously explained, Zimmerly and Nutter “have continually raised new issues in nearly every pleading and brief they have filed” in this matter over the past five years, including in their currently pending Petition for Review. (Friends & Neighbors’ Answer to Pet. for Review at 4–7.) Now, the BIAW attempts to pile on with even more new issues.

For example, the BIAW raises the new issue of deference to administrative agencies. (Amicus Br. at 6, 9–10.) This issue was not raised in the pending Petition for Review, nor was it a basis for the arguments and decision at the Court of Appeals. The Rules of Appellate Procedure do not allow amici to inject new legal issues into an appeal. *See* RAP 10.6(b), 13.4(h); *Protect the Peninsula’s Future v. City of Port Angeles*, 175 Wn. App. 201, 217, 304 P.3d 914 (2013) (“[T]his court does not consider new

issues raised for the first time in an amicus brief.”). The BIAW should not be permitted to add to the issues here.

The BIAW also alleges an “economic benefit of residential construction,” a “severe shortage of homes” in Washington state, and “unnecessary additional costs related to overregulation and permitting delays,” and attempts to raise as a new issue whether the disposition of this appeal “will exacerbate Washington State’s existing housing supply and affordability crisis.” (Amicus Br. at 8.) None of these issues are presented in this appeal—neither directly nor indirectly.

This appeal involves an enforcement action brought by Clark County against Zimmerly and Nutter for mining without various land use approvals required for mining operations in the National Scenic Area. This appeal does *not* involve residential construction. It does *not* involve any application for land use approval or building permits for constructing a residence or any other building. And it does *not* involve any delay in obtaining

any permit. All of these policy concerns are non-issues in this appeal.

Zimmerly and Nutter would not need any *building* permits to mine the site. Yet it seems that BIAW's primary grievance is about alleged delays across the state of Washington in obtaining building permits or some other type of permit(s) associated with residential construction.³ Again, the BIAW's expressly stated concerns have nothing to do with the actual issues in this appeal.

It should also be noted that Zimmerly and Nutter previously asserted or implied at the Court of Appeals that this appeal does not involve any permits. For example, Zimmerly argued that "[t]he '1993 Permit' [s]hould be [c]alled the '1993

³ The BIAW does not explain anywhere in its Amicus Brief, its accompanying Motion, or its cited report at <https://www.biaw.com/research-center/cost-of-permitting-delays/> what type(s) of permits it alleges are supposedly being "delayed." The BIAW might be referring to land use approvals, building permits, environmental permits, or some other type of permit. The BIAW is apparently concerned about delays in some unspecified type(s) of permits associated with residential construction, which is not an issue in this case.

Decision.” (Zimmerly’s Reply Br. at 4.) And for its part, Nutter asserted that Nutter and Zimmerly already have all the permits they need to mine the site, and that this appeal is “not about an attempt to operate a mine in the Columbia River Gorge indefinitely, without permits or regulation.” (Nutter’s Reply Br. at 1–2.) The BIAW’s focus on permits is thus at odds with the Petitioners’ arguments and positions in this appeal.

The BIAW attempts to link many of its improperly raised new issues with the issues actually presented in the appeal by asserting that mining on this site “has been delayed for at least five years” by this appeal. (Amicus Br. at 14.) That assertion is patently false. The truth is that Zimmerly and Nutter illegally mined the site for approximately two and a half years during the pendency of this litigation, without any consequences to date. (See CP 170–72, 478–88, 659–60, 679–87, 983–85; see also *Zimmerly v. Columbia River Gorge Comm’n*, ___ Wn. App. ___, 527 P.3d at 88, 91 (2023) (noting that in 2017, Nutter and Zimmerly resumed mining at the site without permits).)

In addition, Zimmerly and Nutter are the parties responsible for filing and litigating the instant appeal, plus the vast majority of prior appeals in this matter⁴ and related cases⁵ for more than five years. It is illogical for the BIAW to complain about those five years of litigation,⁶ which could have been voluntarily ended at any time by Zimmerly and Nutter.

The BIAW also appears to imply that enforcement actions and appeals thereof will cause delays in obtaining permits. (*See* Amicus Br. at 6, 13–15.) If that is indeed what the BIAW is

⁴ Zimmerly and Nutter filed three appeals to the Clark County Hearing Examiner (County Rec. 2316, 2321, 2324; *see also Zimmerly*, 527 P.3d at 92), two appeals to Clark County Superior Court (CP 5, 423; *see also Zimmerly*, 527 P.3d at 88–89, 95–96), an appeal to the Washington Court of Appeals, and now the Petition for Review currently pending at this Court.

⁵ In addition to the instant matter, Zimmerly and Nutter also filed (and lost) ancillary litigation. *Zimmerly v. Columbia River Gorge Comm’n*, ___ F. Supp. 3d ___, 2023 WL 2611905 (W.D. Wash. Mar. 23, 2023); Final Order & Judgment, *ZP#5, LLC v. Columbia River Gorge Comm’n*, Clark Cnty. Super. Ct. No. 20-2-02402-06 (Mar. 24, 2023).

⁶ *See, e.g.*, Amicus Br. at 14–15 (complaining about “a five-year delay due to a Commission appeal and accompanying litigation”); *id.* at 13 (complaining that “one’s development will be halted for months – or even years – in the appeal process”).

intending to argue, then the BIAW is wrong. Although enforcement actions in the National Scenic Area are rare, they always involve either violations of conditions of approval *after permits have been obtained*,⁷ or as in the instant case,⁸ violations of land use laws *in the absence of required permits*.⁹ The BIAW fails to establish that enforcement actions can or will have any bearing on the length of time it may take to obtain building permits or any other type of permit.

⁷ See, e.g., *Skamania County v. Columbia River Gorge Comm'n*, 144 Wn. 2d 30, 38, 26 P.3d 241 (2001) (“During construction [of a residence and accessory buildings], the Beas allegedly violated several of the conditions that had been established by the [county planning] director.”).

⁸ “In 2018, Clark County began a code enforcement action against Zimmerly and Nutter for operating the mine without a scenic area authorization” *Zimmerly*, 527 P.3d at 88.

⁹ See, e.g., *Murray v. State*, 203 Or. App. 377, 392, 124 P.3d 1261 (2005) (“[P]laintiffs completely disregarded the commission’s order and correspondence and conducted mining activities on their property without a permit in violation of the Act and the commission’s regulations.”); *Murray v. Columbia River Gorge Comm'n*, 133 Or. App. 461, 463, 466, 891 P.2d 1380 (1995) (petitioner violated the National Scenic Area Act “by conducting a major development action involving the removal of aggregate and other resources on property in Wasco County, Oregon, without obtaining Commission approval”).

In fact, in this very matter, Clark County officials repeatedly ordered Zimmerly and Nutter to apply for land use permits,¹⁰ and their response has been simultaneously lethargic and recalcitrant. Zimmerly and Nutter have nobody but themselves to blame for any delays in seeking and obtaining permits for mining. This Court should reject the BIAW's attempts to cast blame on everyone else other than the responsible parties.

C. The BIAW's arguments would require this Court to overrule well-established case law involving the National Scenic Area.

The BIAW's arguments would require this Court to overrule well-established case law involving the National Scenic Area, a point that is neither acknowledged nor addressed in BNSF's Amicus Brief.

First, the BIAW asserts that "the [Columbia River Gorge] National Scenic Area Act . . . does not give the Commission

¹⁰ CP 983–85; *see also Zimmerly*, 527 P.3d at 91–92.

authority to hear appeals of Clark County . . . code enforcement actions.” (Amicus Br. at 6; *see also id.* at 8 (asking whether the “Commission exceeded its jurisdiction by hearing an appeal of a Clark County Code enforcement action”).) Yet this Court has already held that the National Scenic Area Act gives the Commission “final appellate authority over all county land use decisions,” including “when an enforcement action is brought.” *Skamania County v. Gorge Commission*, 144 Wn. 2d at 50, 53.¹¹ Thus, this Court properly interpreted the Act on this point more than twenty years ago. The BIAW fails to address this well-settled authority and offers no valid reason for overturning it.

Similarly, the BIAW objects to “federal land use regulation” and “federal zoning law” in the National Scenic Area, and asserts that “Congress did not intend for the Act to be

¹¹ *See also* 2020 Gorge Management Plan at 355 (“The Gorge Commission shall hear appeals of final enforcement actions relating to implementation of the Management Plan.”). This language has been in the Gorge Management Plan since 2004. *See* 2004 Gorge Management Plan at IV-1-5.

a federal zoning law.” (Amicus Br. at 6, 8.) Yet the Washington Court of Appeals has already held that the U.S. Forest Service and Gorge Commission, in the form of the Gorge Management Plan, may “provide a solution” to “resolve zoning disputes” in the National Scenic Area. *Skamania County v. Woodall*, 104 Wn. App. 525, 539–40, 16 P.3d 701 (2001), *review denied*, 144 Wn.2d 1021, 34 P.3d 1232 (2001), *cert. denied*, 535 U.S. 980 (2002).

This legal question raised by the BIAW has thus already been resolved, with the Court of Appeals correctly concluding that the Act authorizes the adoption of federal and interstate standards and guidelines for land use and development activities in the National Scenic Area. This ruling is in accordance with the long-established decisions of a number of courts upholding the authority of the Gorge Commission and Forest Service to implement the National Scenic Area Act by adopting and implementing land use rules and standards unique to the National

Scenic Area.¹² The BIAW overlooks this copious authority and offers no valid reason for it to be overturned.

IV. CONCLUSION

Friends and Neighbors respectfully request that the Court reject the arguments in the BIAW's Amicus Brief and deny Petitioners' Petition for Review.

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¹² See, e.g., *Broughton Lumber Co. v. Columbia River Gorge Comm'n*, 975 F.2d 616 (9th Cir. 1992); *Columbia River Gorge United-Protecting People & Property v. Yeutter*, 960 F.2d 110 (9th Cir. 1992); *GLW Ventures LLC v. U.S. Dep't of Agric.*, 261 F. Supp. 3d 1098 (W.D. Wash. 2016); *Friends of the Columbia Gorge, Inc. v. Schafer*, 624 F. Supp. 2d 1253 (D. Or. 2008); *W. Birkenfeld Trust v. Bailey*, 827 F. Supp. 651 (E.D. Wash. 1993); *Klickitat County v. Columbia River Gorge Comm'n*, 770 F. Supp. 1419 (E.D. Wash. 1991); *Friends of the Columbia Gorge, Inc. v. Wash. State Forest Practices Appeals Bd.*, 129 Wn. App. 35, 118 P.3d 354 (2005); *Friends of the Columbia Gorge, Inc. v. Columbia River Gorge Comm'n*, 126 Wn. App. 363, 108 P.3d 134 (2005); *Tucker v. Columbia River Gorge Comm'n*, 73 Wn. App. 74, 867 P.2d 686 (1994); *Klickitat County v. State*, 71 Wn. App. 760, 862 P.2d 629 (1993).

**CERTIFICATE OF COMPLIANCE WITH
WORD-COUNT REQUIREMENTS**

The undersigned certify that this Answer complies with the word-count limitation in RAP 18.17(c)(9), and that the word count of this Answer (as described in RAP 18.17(c)) is 2,499 words.

RESPECTFULLY SUBMITTED this 25th day of July, 2023.

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CERTIFICATE OF SERVICE

I hereby certify that on the date indicated below, I served a copy of the foregoing ANSWER OF RESPONDENTS-APPELLEES FRIENDS OF THE COLUMBIA GORGE, JODY AKERS, PAUL AKERS, DANNY GAUDREN, KATHEE GAUDREN, RACHEL GRICE, ZACHARY GRICE, GREG MISARTI, EDMOND MURRELL, KIMBERLY MURRELL, RICHARD J. ROSS, KAREN STREETER, SEAN STREETER, and ELEANOR WARREN TO BIAW'S AMICUS BRIEF by email on the following persons:

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