No. 89407-8

SUPREME COURT
OF THE STATE OF WASHINGTON.

SPOKANE COUNTY, a political subdivision of the State of Washington,

Appellant,

v.

EASTERN WASHINGTON GROWTH MANAGEMENT HEARINGS BOARD, a statutory entity,

and

DAN HENDERSON, LARRY KUNZ, NEIL MEMBREY, KASI HARVEY JARVIS, and NEIGHBORHOOD ALLIANCE OF SPOKANE

Respondents.

RESPONSE TO PETITION FOR REVIEW

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I. IDENTITY OF RESPONDENTS

Pursuant to RAP 13.4, Respondents, Dan Henderson, Larry Kunz, Neil Membrey, Kasi Harvey-Jarvis, and Neighborhood Alliance of Spokane, provide this response respectfully requesting that this Court deny Appellant Spokane County's request for review of this matter.

II. COURT OF APPEALS DECISION

Appellant seeks review of the September 10, 2013, decision of Division III of the Court of Appeals. *See Spokane County v. Eastern Washington Growth Management Hearings Bd.*, 309 P.3d 673 (2013)("Decision"). A copy of that decision is included as Appendix IV to Appellant's Petition for Review. That decision involved the review under the Growth Management Act ("GMA"), Chapter 36.70A RCW, of a decision of the Spokane County Superior Court affirming a Final Decision and Order of the Eastern Washington Growth Management Hearings Board (the "Board") finding that a comprehensive plan amendment and concurrent land reclassification/rezone adopted by Spokane County ("County") was out of compliance with the requirements of the GMA and the State Environmental Policy Act ("SEPA"), Chapter 43.21C RCW. The Court of Appeals affirmed the decision of the Superior Court and the findings of the Board, finding that: (1) the County had previously argued unsuccessfully that the Board lacked jurisdiction and was therefore is

bound by the law of the case doctrine; (2) notwithstanding, the Board has jurisdiction to review a comprehensive plan amendment and concurrent rezone; (3) the comprehensive plan amendment failed to minimize and contain the intensification and infill of commercial use within logical outer boundary of Limited Area of More Intensive Rural Development ("LAMIRD"), and therefore violated the GMA; (4) that the SEPA documents prepared for the comprehensive plan were inadequate; and (5) that the amendment would substantially interfere with the goals of the GMA; and that County was afforded the required deference.

In the Petition for Review, Appellant does not dispute the findings of the Court of Appeals in regards to whether the County was bound by the law of the case doctrine and the LAMIRD intensification and infill requirements of the GMA.

III. ISSUES FOR REVIEW

Respondents do not seek review of any matters decided by the Court of Appeals, but believe that Appellant's issues for review are better characterized as follows:

A. Whether the Court of Appeals already addressed and this Court denied review of Spokane County's assertion that the Hearings Board lacked jurisdiction to review this matter in *Spokane County v. Eastern Washington Growth Management Hearings Bd.*, 160 Wash.App. 274, 250

P.3d 1050 (2011), *review denied,* 171 Wash.2d 1034, 257 P.3d 662 (Jul 13, 2011).

B. Notwithstanding the previous determination of this matter, does the Hearings Board have jurisdiction to hear appeals regarding concurrent amendments to Spokane County's comprehensive plan and zoning maps, including amendments to land use designations.

C. Whether Spokane County as a local jurisdiction was afforded appropriate deference in review of its comprehensive plan amendments.

D. Whether Spokane County failed to assess impacts of the Comprehensive Plan amendment and concurrent rezone in the SEPA process.

IV. STATEMENT OF THE CASE

The facts are well summarized in the Court of Appeals' decision at pages 2-4 of the published opinion. *See* Appendix IV, Petition for Review. However, provided is a brief highlight of the facts relevant to the petition for review.

The challenged action redesignated and rezoned approximately 4.2 acres of land from Urban Reserve outside of the Urban Growth Area (rural lands) to Limited Development Area-Commercial outside of the Urban

Growth Area. AR[1] 213. The specific comprehensive plan amendment and rezoning action, 07-CPA-05, was approved by Spokane County Resolution 07-1096 on December 21, 2007. AR 199-215. Resolution 07-1096 involved the review of 15 proposed changes to the Comprehensive Plan and zoning map and resulted in the approval of eight such changes (the remainder were denied) by legislative action of the Spokane County Commissioners. AR 199-215. Notice was published on December 24, 2007, and is evidenced by Spokane County Resolution 07-1097. AR 29.

A SEPA checklist and Determination of Nonsignificance ("DNS") were issued by Spokane County cumulatively for eight rural amendments and zoning map changes, including 07-CPA-05, on September 20, 2007. AR 36-63. Rather than conduct any meaningful environmental assessment and evaluation of the eight proposed comprehensive plan amendments, the DNS concludes, "The lead agency for this proposal has determined that it does not have a probable significant adverse impact on the environment. This decision was made after review of a completed environmental checklist and other information on file with the lead agency. This information is available to the public on request." AR 36. However, the record contains no additional information meaning that the sole basis for this conclusion was the environmental checklist.

[1] "AR" refers to the Hearings Board's Administrative Record.

The SEPA environmental checklist lacked analysis of any impacts and, in fact, deferred much of the analysis until a later time stating, "Non Project Action: To be determined if site specific developments are proposed for Rural Comprehensive Plan Amendments." *See, e.g.,* AR 43. This was the case for all, or a great portion, of the sections of the checklist addressing stormwater, earth, air, water, groundwater, stormwater/runoff, plants, animals, energy and natural resources, environmental health, noise, aesthetics, light and glare, transportation, public services and utilities. *See generally* AR 41-58.

The SEPA documents were timely appealed to the County Hearing Examiner by Respondents Dan Henderson, Larry Kunz, and Neil Membrey on October 5, 2007. *See* AR 438-488. A decision denying this appeal was issued on December 10, 2007. *See* AR 30-36. A timely appeal of Resolution 08-1096, focusing on 07-CPA-05 and the concurrent zoning map amendment (and related SEPA documents) was filed with the Board on February 11, 2008. AR 1-9. The Petition for Review filed with the Board states, "Petitioners ... seek review from the Eastern Washington Growth Management Hearings Board of an action of Spokane County unlawfully amending the Spokane County Comprehensive Plan and County Zoning map by redesignating approximately 4.2 acres of rural land as Limited Development Area – Commercial." AR 1. The Petition went

on to state that review is sought of "a Comprehensive Plan and County Zoning map amendment." AR 3.

The Board ruled on the substantive issues of this case, issuing its Final Decision and Order on September 5, 2008, finding that Spokane County had failed to comply with the GMA, SEPA, and its own development regulations and planning documents in adopting the Comprehensive Plan amendment and concurrent rezone. AR 852-906. The Board also issued a ruling finding the actions invalid under the GMA. *Id.* In particular, the Board found:

> Spokane County failed to implement and comply with SEPA as set forth in RCW 43.21C by failing to identify, disclose, analyze and/or mitigate known and/or possible impacts associated with the approval of 07-CPU-05.
>
> ...
>
> There is no substantial evidence in the record to support a determination that this isolated peninsula would form a logical outer boundary of an existing area of more intensive rural development.
>
> ...
>
> Spokane County failed to comply with RCW 36.70A.070(5)(d) when it approved 07-CPU-05 and failed to (1) minimize and contain the existing areas or uses of more intensive rural development; (2) establish a logical outer boundary delineated predominately by the built environment; (3) preserve the character of existing natural neighborhoods and communities; (4) establish a physical boundary; and failed to (5) prevent abnormally irregular boundaries.

...

> Spokane County failed to comply with its Comprehensive Plan Goal RL.5a and Policy RL.5.2., when it designated the 4.2 acre McGlades parcel within the LDAC zone by adopting amendment 07-CPA-05.
>
> ...
>
> Spokane County failed to comply with RCW 36.70A.070(5)(d)(iv) by adopting amendment 07-CPU-05, which substantially interferes with GMA Goals (1) and (2) by failing to contain urban development and reduce the inappropriate conversion of undeveloped land into sprawling, low-density development.
>
> ...
>
> Spokane County failed to comply with GMA Goal (10), the County's CP and CAO for failing to adequately address, analyze and/or mitigate the environmental impacts of 07-CPU-05.

AR 898-99. The Order recognized that the appeal covered both the amendment to the comprehensive plan and the concurrent zoning action: "Petitioners ... filed a Petition for Review (PFR) challenging Spokane County's (County) adoption of Comprehensive Plan (CP) amendment 07-CPA-05, the concurrent Spokane County Zoning map amendment..." AR 853.

The Board remanded the action to Spokane County with direction for the County to take legislative action to achieve compliance with the Growth Management Act within 180 days. AR 902.

On September 30, 2008, the County appealed the Board's Final Order to Spokane County Superior Court. Without ruling on the substance of the Hearings Board's decision, the Superior Court ruled in its July 24, 2009 Order on Summary Judgment that the Board lacked jurisdiction to review 07-CPA-05 characterizing it as a site-specific rezone. This Order was reversed and remanded by the Court of Appeals on January 13, 2011. *Spokane County v. Eastern Washington Growth Management Hearings Bd.*, 160 Wash.App. 274, 250 P.3d 1050 (2011)("*Spokane County I*"). In the 2011 decision, the Court of Appeals found that the Board did have jurisdiction to review the comprehensive plan amendment and concurrent rezone. *Id.* at 282.

A second round of briefing ensued addressing the substantive issues where the County asserted that the Board erred in its substantive ruling and reasserting its claim that the Board lacked jurisdiction. On February 24, 2012, the Superior Court affirmed the substantive finding of the Hearings Board and rejecting the County's argument that the matter was outside the scope of the Hearings Board review. CP 185-94.

A second appeal to the Court of Appeals followed. A decision affirming the decision of the Superior Court was issued by the Court of Appeals on September 10, 2013.

V. ARGUMENT OPPOSING PETITON FOR REVIEW

A. PETITIONER FAILED TO ARTICULATE WHY THE PETITION MEET THE CRITERIA SET FORTH IN RAP 13.4(B).

RAP 13.4(b) provides that a petition for review will be accepted only:

> (1) If the decision of the Court of Appeals is in conflict with a decision of the Supreme Court;
>
> (2) If the decision of the Court of Appeals is in conflict with another decision of the Court of Appeals;
>
> (3) If a significant question of law under the Constitution of the State of Washington or of the United States is involved; or
>
> (4) If the petition involves an issue of substantial public interest that should be determined by the Supreme Court.

RAP 13.4(b). Here, Petitioner failed to demonstrate to this Court any of the four criteria warranting review by this Court. To the contrary, as demonstrated below, the Court of Appeal's decision is consistent with the clear intent of the Legislature, other decisions of Washington courts, with other Hearings Board decisions, and does not raise any constitutional and public interest issues. Moreover, the County's bases for review, as discussed below are simply without merit. Accordingly, this Court should deny the Petition for Review.

B. WHETHER THE HEARINGS BOARD LACKS JURISDICTION WAS CONSIDERED AND REJECTED BY THE COURT OF APPEALS IN ITS 2011 DECISION AND REVIEW OF THAT DECISION WAS DENIED BY THIS COURT.

Spokane County argues that the challenged actions are a "site specific rezone" not subject to Hearings Board jurisdiction. However, the Court of Appeals correctly concluded that its 2011 decision in *Spokane County I* previously considered and rejected the County's argument that the Board lacked jurisdiction to review of the comprehensive plan amendment and concurrent rezone.

> In sum, *Spokane County I* held the hearings board had GMA authority to consider the Neighbors' petition. Because the Neighbors' petition alleged "Spokane County unlawfully amend[ed] the Spokane County Comprehensive Plan and County Zoning map," AR at 1 (emphasis added), the Spokane County I court explained the hearings board had subject matter jurisdiction to review both the comprehensive plan amendment and concurrent rezone under the GMA, thereby rejecting McGlades's site-specific rezone arguments. Contrary to law of the case principles, the County again contends, as did McGlades in *Spokane County I*, that the hearings board lacked jurisdiction to review the rezone because it is a site-specific land use decision within the superior court's exclusive jurisdiction under LUPA.

Decision at 8-9. The Court of Appeals in *Spokane County I* specifically found:

> Site-specific rezones authorized by an existing comprehensive plan are treated differently from amendments to comprehensive plans or development regulations. RCW 36.70B.020(4). The Land Use Petition

> Act (LUPA) (chapter 36.70C RCW) governs site-specific land use decisions and the superior court has exclusive jurisdiction over petitions that challenge site-specific land use decisions. RCW 36.70C.030; *Somers*, 105 Wash.App. at 941–42, 21 P.3d 1165. However, "[t]he superior court may decide only whether a site-specific land use decision complies with a comprehensive plan and/or development regulation," not whether the rezone complies with the GMA. *Woods*, 162 Wash.2d at 603, 174 P.3d 25. LUPA does not apply to local land use decisions "that are subject to review by a quasi-judicial body created by state law, such as ... the growth management hearings board." RCW 36.70C.030(1)(a)(ii); *Caswell v. Pierce County*, 99 Wash.App. 194, 198, 992 P.2d 534 (2000).
>
> ...
>
> Here, the Neighbor's petition challenged amendment 07–CPA–05, as approved by Spokane County Resolution 07–1096. The resolution is titled: "IN THE MATTER OF ADOPTING ANNUAL AMENDMENTS TO THE SPOKANE COUNTY COMPREHENSIVE PLAN FOR 2007." CP at 101. The resolution adopted eight amendments and concurrent reclassifications to the comprehensive plan, including 07–CPA–05.

Spokane County, 160 Wash.App. at 282. This Court denied review of that decision. 171 Wash.2d 1034, 257 P.3d 662 (Jul 13, 2011).

As articulated in the Decision, Spokane County is now bound by this case. The doctrine of the law of the case precludes relitigation of these issues. *Roberson v. Perez*, 156 Wash.2d 33, 123 P.3d 844 (2005). Here, the parties are bound by the previous determination of the Court of Appeals in regards to this matter – that the Board did have jurisdiction to consider this appeal.

C. THE BOARD HAS JURISDICTION TO REVIEW A COMPREHENSIVE PLAN AMENDMENT AND CONCURRENT REZONE.

Notwithstanding the binding effect of the 2011 decision in *Spokane County I*, the County assertion that the Board lacks jurisdiction to hear appeals of a comprehensive plan amendment and concurrent rezones is simply wrong. The Court of Appeals decision is consistent with the intent of the GMA that provides that amendments to comprehensive plans and concurrent land reclassifications be appealed to the Hearings Boards.

Washington cases recognize the distinction between a rezoning action implementing an existing comprehensive plan provision and the adoption of new land classification and comprehensive plan amendments. For example, this Court in *Wenatchee Sportsmen Ass'n v. Chelan County* found that superior court had jurisdiction over a challenge of Chelan County's approval of a "site specific rezone" authorized by an existing comprehensive plan. 141 Wash.2d 169, 179-80, 4 P.3d 123 (2000). The action challenged here is the challenge of an amendment to the comprehensive plan and a concurrent land reclassification – nothing in the record supports that Resolution 07-1096 reclassified land consistent with a prior and existing comprehensive plan provision.

In reaching its decision in *Wenatchee Sportsmen*, the Supreme Court's inquiry focused primarily on what is or is not a "development regulation." 141 Wash.2d at 178-79. Specifically, the Court stated:

> The GMA defines what a "development regulation" is and, more helpfully, what it is not: "A development regulation does not include a decision to approve a project permit application, as defined in RCW 36.70B.020, even though the decision may be expressed in a resolution or ordinance of the legislative body of the county or city." RCW 36.70A.030(7). The Local Project Review statute defines "project permit application" as including, among other things, "site-specific rezones authorized by a comprehensive plan or subarea plan." RCW 36.70B.020(4). The items listed under "project permit application" are specific permits or licenses; more general decisions such as the adoption of a comprehensive plan or subarea plan are not approvals of project permit applications. RCW 36.70B.020. The conclusion to be drawn from these provisions is that a site-specific rezone is not a development regulation under the GMA, and hence pursuant to RCW 36.70A.280 and .290, a GMHB does not have jurisdiction to hear a petition that does not involve a comprehensive plan or development regulation under the GMA.

Id.(emphasis added). Here, the reclassification was not "authorized by a comprehensive plan" until the comprehensive plan amendment was concurrently adopted by the same legislative action (Resolution 07-1096).

The Court of Appeals decision here is consistent with *Wenatchee Sportsmen* and with its earlier decision in *Kittitas County v. Kittitas County Conservation,* 308 P.3d 745, 751 (2013), which concluded, "[W]e

hold a site-specific rezone is a project permit approval under LUPA if it is authorized by a then-existing comprehensive plan and, by contrast, is an amendment to a development regulation under the GMA if it implements a comprehensive plan amendment."

Appellant's primary argument for review is that the decision here conflicts with the Court of Appeals' 2008 decision in *Coffey v. City of Walla Walla.* However, both the decision here and the *Kittitas County* decision point out that the language relied upon by the County was dicta and distinguishable to the facts considered by the Board, stating:

> Dictum in *Coffey v. City of Walla Walla*, 145 Wash.App. 435, 187 P.3d 272 (2008), does not require a different conclusion. There, the city amended its comprehensive plan but did not rezone the property. *Id.* at 438, 187 P.3d 272. The *Coffey* court held the superior court lacked subject matter jurisdiction to review the comprehensive plan amendment under LUPA because the hearings board had exclusive jurisdiction to do so under the GMA. *Id.* at 441, 187 P.3d 272. The *Coffey* court continued,
>
> > It is not uncommon for those hoping to develop property to seek both a comprehensive plan amendment and a rezone of property in the same proceeding. Anyone seeking to challenge both aspects of a ruling granting both requests would by statute have to appeal to two entities: the [hearings board] for the comprehensive plan amendment and superior court for the rezone.
>
> *Id.* at 442, 187 P.3d 272. This statement was unnecessary to the *Coffey* court's holding because the city amended its

> comprehensive plan but did not rezone the property. Additionally, this statement is true solely if a rezone is site specific and authorized by a then-existing comprehensive plan. In making this statement, the *Coffey* court did not consider whether a rezone that implements a comprehensive plan amendment can be an amendment to a development regulation.

Kittitas County, 308 P.3d at 750-51; *see also* Decision at 12-13.

This Court of Appeals was correct in its review of this matter – both times – the Board has jurisdiction to review the comprehensive plan amendment and concurrent rezone.

D. THE COUNTY'S DECISION IS NOT ENTITLED TO DEFERENCE BECAUSE IT FAILED TO IMPLEMENT AND COMPLY WITH THE GROWTH MANAGEMENT ACT.

The County asserts that the Court of Appeals erred in finding that the County violated the GMA by asserting that it is entitled to broad discretion and that the Board has limited scope of review. What they don't do, is actually argue the error of the ruling and how the County's action was consistent with the GMA.

The County assigned no error to the substantive ruling that it failed to minimize and contain the intensification and infill of commercial use within logical outer boundary of Limited Area of More Intensive Rural Development ("LAMIRD") as required by the GMA. Both the Court of Appeals and the Board were correct in its application of the law and the

County is due to no discretion in its decision to ignore the requirements of the GMA:

> Here, the hearings board initially presumed the County's comprehensive plan amendment and concurrent rezone were valid but ultimately found them clearly erroneous in light of the entire record and the GMA's goals and requirements. Again, the hearings board's decision is supported by substantial evidence in light of the whole record, does not erroneously interpret or apply the law, and is not arbitrary or capricious. Thus, the hearings board properly applied the GMA's clearly erroneous review standard.

Decision at 25-26.

Indeed, courts have declined to afford deference to county actions that violate GMA requirements. *Thurston County v. Cooper Point Ass'n*, 148 Wash.2d 1, 14, 57 P.3d 1156 (2002). In *Thurston County*, the county's proposed action violated a specific statutory mandate; extending urban services into a rural area in contravention of RCW 36.70A.110(4). *Id.* Thus, this court refused to defer to county's decision where the "County's proposal [did] just what the GMA prohibits." *Id.*

E. THE COUNTY FAILED TO ASSESS IMPACTS OF THE COMPREHENSIVE PLAN AMENDMENT AND CONCURRENT REZONE IN THE SEPA PROCESS.

The County asserts that the Court erred in finding that the County violated the State Environmental Policy Act ("SEPA") because they allege that there is no expected future development. This fails because the record

indicates that the County's own SEPA documents calls for deferral of SEPA analysis and SEPA requires analysis of the maximum potential development at the time of adoption of the amendment, including development which the record indicates is expected to occur – which has yet to occur.

The record demonstrates that the County intended to a future, uncertain, and unidentified approval process. The SEPA checklist explicitly defers much of the analysis until a later time simply stating, "Non Project Action: To be determined if site specific developments are proposed for Rural Comprehensive Plan Amendments." *See, e.g.*, AR 424.

Moreover, the record indicates that there is expected to be additional development on the site. The application for a conditional use permit requested expansion to include an asphalt driveway and drive-through espresso service, asphalt parking lot with spaces for 39 vehicles, outdoor dining and entertainment with seating for 64 patrons, and on-site alcohol consumption. The hearing examiner noted this expansion "is likely if the site is rezoned." AR at 178. The hearing examiner clarified, "McGlades ... seeks to reopen the business, and to expand it under the [Limited Development Area (Commercial)] zone." AR at 172. This is

inconsistent with the Petitioner's argument that additional analysis is not needed.

Second, the law is clear that the SEPA analysis needs to occur at the time of adoption of the comprehensive plan and that did not occur. SEPA requires the disclosure and full consideration of environmental impacts in governmental decision making. *Polygon Corporation v. Seattle*, 90 Wn.2d 59, 578 P. 2d 1309 (1978), *citing Norway Hill Preservation & Protection Ass'n v. King County Council*, 87 Wn.2d 267, 552 P.2d 674 (1976). Decisions from Washington courts affirm the need for a detailed analysis early in the land designation process. For example, this Court in *King County v. Washington State Boundary Review Board for King County*, 122 Wn.2d 648, 860 P.2d 1024 (1993), stated that a "land-use related action is not insulated from full environmental review simply because there are no existing specific proposals to develop the land in question or because there are no immediate land-use changes which will flow from the proposed action." The Court recognized that the purpose of SEPA is "to provide consideration of environmental factors at the earliest possible stage to allow decisions to be based on complete disclosure of environmental consequences." *Id.* The Court also indicated that the point of SEPA is to "not evaluate agency decisions after they are made, but

rather to provide environmental information to assist with *making* those decisions." *Id.* at 666 (emphasis in the original).

By deferring analysis, the County failed to comply with the requirements of SEPA that the maximum possible development of the site be assessed. The Court of Appeals in *Ullock v. Bremerton*, 17 Wn. App.573, 565 P.2d 1179 (1977) found, "We hold that an EIS is adequate in a non-project zoning action where the environmental consequences are discussed in terms of the **maximum potential development** of the property under the various zoning classifications allowed."

The County's decisions must consider more than the narrow, limited environmental impact of the immediate, pending action and cannot close their eyes to the ultimate probably environmental consequences. *Cheney v. Mountlake Terrace,* 87 Wash.2d 338, 344, 552 P.2d 184 (1976).

VI. CONCLUSION

Spokane County failed to demonstrate that this matter meets the requirements set forth in RAP 13.4(b). The decision of the Court of Appeals is consistent with Washington law, as well as decisions of the Supreme Court and the Court of Appeals. Moreover, no constitutional issues or substantial matters of public interest are raised.

For these reasons and the reasons set forth above, Respondents request that this Court deny Petitioner's Petition for Review.

Respectfully submitted this 22nd day of November, 2013.

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CERTIFICATE OF SERVICE

I, Danette Lanet, certify that on the 22 day of November, 2013, I caused the foregoing *Response to Petition for Review* to be served, via USPS postage prepaid, on the following:

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DATED this 22 day of November, 2013.

Danette Lanet

Danette Lanet

OFFICE RECEPTIONIST, CLERK

From: Danette Lanet <dlanet@cforjustice.org>
Sent: Friday, November 22, 2013 4:39 PM
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Subject: 89407-8
Attachments: 89407-8.pdf

Please file the attached Response to Petition for Review in the above-referenced matter on behalf of:

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Thank you.
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If we do not maintain justice, justice
will not maintain us.
~Francis Bacon