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NO. 958645

SUPREME COURT OF THE STATE OF WASHINGTON

GREGORY AND JANETTE KOVSKY, husband and wife,

Petitioners,

v.

ROBERT FANFANT and MELANIE R. BISHOP, husband and wife, and KING COUNTY,

Respondents.

KING COUNTY'S ANSWER TO PETITION FOR REVIEW

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I. INTRODUCTION

Petitioners Gregory Kovsky and Jannette Kovsky (Kovskys) attempted to challenge a final land use decision months after the applicable deadline for bringing such a challenge had passed. Although the Kovskys advanced several theories to circumvent application of the Land Use Petition Act (LUPA), RCW ch. 36.70C, both the trial court and a unanimous panel of the Court of Appeals concluded they were bound by LUPA. The Kovskys' Petition for Review before this Court resurrects an argument they previously withdrew in an attempt to craft a constitutional issue. The Kovskys also manufacture unrealistic scenarios in their attempt to create an issue of substantial public interest. When stripped of its rhetoric, the issues they raise are no different from those already decided consistently by Washington courts, and the petition presents neither a significant constitutional issue nor a matter of substantial public interest which this Court needs to resolve.

II. IDENTITY OF RESPONDENT KING COUNTY

Respondent King County, by and through the King County Prosecuting Attorney's Office, respectfully requests this Court deny review of the unpublished Court of Appeals opinion in *Kovsky v. Fanfant*, et. al, case number 76142-1-I issued on April 16, 2018. The Court of Appeals affirmed the trial court's dismissal of the lawsuit filed by Gregory

Kovsky and Jeannette Kovsky on February 22, 2016. *Kovsky v. Fanfant*, 2018 WL 1801408 (2018).

III. STATEMENT OF THE CASE

On July 7, 2015 the King County Department of Permitting and Environmental Review (DPER) issued a final land use decision approving construction of an 89-foot amateur Ham radio tower. CP 321. Respondent Robert Fanfant had applied for the permit to construct the radio tower on his property located in an area of unincorporated King County zoned RA-5. CP 229.

As part of the permit review process for the Fanfant radio tower, DPER identified applicable land use and building codes and verified code compliance with those codes. CP 105; 168-170. As a communication facility the Fanfant radio tower was potentially subject to King County Code (KCC or code) ch. 21A.26, which sets out development standards for communication facilities. DPER determined that the exemption in KCC 21A.26.020 applied to the Fanfant radio tower. That section exempts "[l]icensed amateur (Ham) radio stations and citizen band stations" from the development standards for communication facilities. KCC 21A.26.020(G). Based on that exemption, DPER also did not apply the development standards for "minor communication facilities" contained

in KCC ch. 21A.27 and determined that the radio tower construction only required a building permit. CP 124; 166.

After completing its review DPER issued the Fanfant permit on July 7, 2015. CP 124. Thereafter DPER posted notice of the Fanfant permit issuance on its website. CP 166; 288-321. After the radio tower was constructed, DPER staff performed an inspection and issued final approval on September 28, 2015. CP 124 .

The Kovskys live next door to respondents Robert Fanfant and Melanie Bishop. CP 2. On February 22, 2016, over seven months after the Fanfant permit was issued, the Kovskys filed a "Complaint for Injunction, Nuisance, Writ of Mandamus and Petition for Land Use Review" in King County Superior Court against King County, Robert Fanfant and Melanie Bishop. CP 1-9. The Kovskys alleged lack of compliance with zoning and permit requirements for the Fanfant amateur radio tower and sought an injunction declaring it a nuisance and ordering its removal. CP 5-6.

Respondents moved for summary judgment, seeking dismissal of the lawsuit. CP 49-66; 111-119. The Kovskys also moved for summary judgment. CP 17-36. All motions were heard together. The trial court denied the Kovskys' motion, granted respondents' motions and dismissed the Kovskys' lawsuit in its entirety. CP 362-365.

The Kovskys appealed to Division I of the Court of Appeals. In an unpublished opinion, the court unanimously affirmed the dismissal, concluding that the building permit was "the land use decision" which was not timely appealed under LUPA. *Kovsky v. Fanfant*, 2018 WL 834700 (2018) (withdrawn and superseded on reconsideration). The Kovskys sought reconsideration, which was granted in part to correct scriveners errors in the court's original opinion. *Kovsky v. Fanfant*, 2018 WL 1801408 (2018).

IV. ARGUMENT FOR DENIAL OF REVIEW

Under the Rules of Appellate Procedure (RAP) a petition for review will be accepted by the Supreme Court only:

> (1) If the decision of the Court of Appeals is in conflict with a decision of the Supreme Court; or
> (2) If the decision of the Court of Appeals is in conflict with a published decision of the Court of Appeals; or
> (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). The Kovskys identify RAP 13.4(b)(3) and (4) as grounds for acceptance of review. As demonstrated below, the Kovskys' appeal involves application of well-settled legal principles and interpretation of a local ordinance without broad implications. Both the trial court and the court of appeals correctly applied these principles to conclude that the

Kovskys were barred from challenging King County's land use decision. Further review is unnecessary.

A. The Kovskys' Due Process Argument is Being Raised for the First Time on Appeal.

The Court should decide as a preliminary matter that the Kovskys cannot pursue their due process claim for the first time by raising it in their petition for review. The Kovskys did not plead violation of due process in their Complaint, nor did they rely on it as a basis for summary judgment before the trial court. They did raise this line of argument before the Court of Appeals in asserting that actual notice was required to trigger LUPA's statute of limitations. This was supported by challenging the adequacy of the notice of the building permit. Appellants' Opening Brief at 38. The Kovskys also quoted *Barrie v. Kitsap County*, 84 Wn.2d 579, 527 P.2d 1377 (1974) for the proposition that "[o]ne of the touchstones of due process in any proceeding is notice reasonably calculated under all the circumstances to apprise affected parties of the pending action and afford them an opportunity to present their objections." Appellants' Opening Brief at 40.

Upon objection by Mr. Fanfant and Ms. Bishop in their response that the theory was being advanced for the first time in the Court of Appeals, the Kovskys acknowledged that their "alternative argument

about notice" was not raised before the trial court and withdrew that argument. Appellants' Reply Brief at 30, n. 10. Accordingly, the Court of Appeals did not rule on this issue.

While framed slightly differently, the Kovskys' due process argument hinges on the adequacy of the notice of the building permit.[1] Petition at 13 ("The Kovskys did not receive effective notice of the building permit issued for the Fanfant tower"). Consequently the Kovskys are raising an argument they did not present before the trial court and withdrew from their appeal in the Court of Appeals. As an issue that neither the trial court nor the Court of Appeals ruled on, this Court should decline to accept review of it. *See Concerned Coupeville Citizens v. Town of Coupeville*, 62 Wn. App. 408, 413, 814 P.2d 243 (1991) ("Contentions not made to the trial court in its consideration of a summary judgment motion need not be considered on appeal") (citing *Re v. Tenney*, 56 Wn. App. 394, 399, 783 P.2d 632 (1989)).

While RAP 2.5(a) permits "manifest error affecting a constitutional right" to be raised for the first time on appeal, as an exception to the general rule, it is narrowly construed. *State v. WWJ Corp.*, 138 Wn.2d 595, 602, 980 P.2d 1257 (1999). As explained by the Court in *WWJ Corp.*, "[i]f the record from the trial court is insufficient to

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[1] The Kovskys challenge the adequacy of the building permit notice despite repeatedly insisting that they were not challenging the building permit.

determine the merits of the constitutional claim, then the claimed error is not manifest and review is not warranted." *Id.* (citations omitted). The Kovskys cannot meet this high bar for raising their due process claim for the first time before this Court.

B. The Kovskys Do Not Have a Viable Due Process Claim.

Even if the Court were to hold that the Kovskys may pursue their due process argument, the petition for review should nevertheless be denied.

The Kovskys base their due process claim on the property right purportedly created by the King County's Code's development standards for minor communication facilities codified at KCC ch. 21A.27. Petition at 11. Citing *Asche v. Bloomquist*, 132 Wn. App. 784, 133 P.3d 475 (2006) and *Durland v. San Juan County*, 182 Wn.2d 55, 340 P.3d 191 (2014) the Kovskys assert that "[t]he issue is whether the zoning code 'requires the permitting authority to consider the views of neighboring property owners.' " Petition at 10 (quoting *Durland*, 182 Wn.2d at 72). King County maintains, as the Court of Appeals found, that KCC ch. 21A.27 does not apply and its notice provisions therefore should not be considered in determining whether the Kovskys may pursue their due process claim. But accepting for the sake of argument that KCC ch.

21A.27 is applicable, the Kovskys nevertheless cannot establish a due process violation.

1. The Kovskys Do Not Have a Property Right that Implicates Due Process.

"Constitutionally protected property interests may be created either through (1) contract, (2) common law, or (3) statutes and regulations." *Durland*, 182 Wn.2d at 70 (citing *Conard v. University of Washington*, 119 Wn.2d 519, 529-30, 834 P.2d 17 (1992)). A zoning ordinance may create a property right. *Asche*, 132 Wn. App. at 797. Such was the conclusion in *Asche* where the applicable zoning codes prohibited buildings which impaired neighboring properties' views. *Id.* at 798. Unlike the code in *Asche* which outright prohibited construction of buildings that impaired views, the King County Code simply requires minor communication facilities exceeding certain heights to undergo an additional layer of permit review through a conditional use permit (CUP). *See* KCC 21A.27.030. While it is possible that an applicant cannot meet the criteria necessary for approval of a CUP, it is fundamentally distinguishable from the property interest created by the code considered in *Asche*.

Instead KCC 21A.27.030 is analogous to the code examined in *Durland*. Like the King County Code, the San Juan County Code required

a conditional use permit for residential structures exceeding a certain height. *Durland*, 182 Wn.2d at 74. The Court drew a distinction between *Asche* and concluded that San Juan's code did not "significantly constrain [the county's] discretion" to issue permits for structures which may impede views of neighboring properties and therefore "do not create a property interest in the denial of a third-party's building permit." *Id.* at 74-75. Without the requisite property interest, the neighbors in *Durland* had no basis to require notice and their due process claim failed. *Id.* at 75. Pursuant to the Court's analysis in *Durland* the Kovskys also lack sufficient property interest and their due process claim must likewise fail.

2. Any Due Process Claim the Kovskys May Have Was Subject to LUPA.

Even if KCC ch. 21A.27 were construed to create a property right, the Kovskys were required to bring their due process claim under LUPA. As the court in *Asche* concluded, the Washington Supreme Court "has established a bright-line rule in *Habitat Watch*; LUPA applies even when the litigant complains of lack of notice under the procedural due process clause." *Asche*, 132 Wn. App. at 798 (citing *Habitat Watch v. Skagit County*, 155 Wn.2d 397, 402, 120 P.3d 56 (2005)). *See also* RCW 36.70C.130(1)(f) (standards for granting relief under LUPA include "land use decision violates the constitutional rights of the party seeking relief").

Compliance with LUPA is required even where actual notice of the permit issuance was not received until after the deadline for appealing had passed. *Durland*, 182 Wn.2d at 59. Acknowledging that strict application of LUPA's deadlines "may seem harsh and unfair" at times, the Court declined to grant relief, because to do so "would be contrary to the statutory scheme enacted by the legislature as well as our prior holdings." *Id.* The Kovskys' challenge is no different and the Court need not revisit this issue. Like the neighbors in *Asche* and *Durland*, the Kovskys lost their right to challenge the land use decision based on due process grounds by failing to file a timely LUPA petition.

The Kovskys base their arguments on the premise that they were entitled to the public notice requirements under KCC 21A.27.010. They were not, but they had a right to challenge that determination by filing a timely LUPA petition. "LUPA does not require that a party receive individualized notice of a land use decision in order to be subject to the time limits for filing a LUPA petition". *Samuel's Furniture Inc. v. State, Department of Ecology*, 147 Wn.2d 440, 462, 54 P.3d 1194 (2002). *See also Applewood Estates Homeowners Association v. City of Richland*, 166 Wn. App. 161, 169, 269 P.3d 388 (2012) (LUPA does not require "specific, personal notice of a land use decision...."). The Kovskys received all the notice to which they were entitled. Classification of the

appropriate type and method of providing notice of land use decisions is a product of legislative process. That legislative process balances the interests of neighboring property owners with the burden placed on permit applicants and the government. Ironically, by virtue of KCC 20.20.062 the Kovskys received more notice than they would have otherwise yet they complain that it was ineffective. Their argument about the onerousness of the county's monthly publishing of issued permits[2] amounts to a complaint that too much information was available.

C. <u>The Kovskys' Petition for Review Does Not Present an Issue of Substantial Public Interest</u>.

The Kovskys contend that the Court of Appeals' decision "considerably restrict[s] the ability of neighboring property owners to challenge development that impacts their property rights." Petition at 15. The Kovskys also insist that the Court of Appeals decision would allow for construction of minor communication facilities with "no height restrictions." Petition at 16. But the court applied well established precedent and arrived at a conclusion that was entirely consistent with that precedent. The court's decision also adhered to LUPA's stated purpose of providing "consistent, predictable, and timely judicial review." RCW

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[2] The report of issued permits is not limited to a spreadsheet listing the permits. The report also contains a hyperlink which provides access to other related information regarding the permit. CP 277; 327-339.

36.70C.010. Furthermore, the scenario of towers of limitless height that the Kovskys envision is wholly unrealistic and not an inevitable outcome.

1. The Court of Appeals Decision is Entirely Consistent with Prior Judicial Holdings and LUPA's Stated Purpose.

No guesswork was needed to determine "which permits are necessary to appeal and whether they will receive notice for some permits and not others." Petition at 16. King County classifies land use decisions into four types, "based on who makes the decision, whether public notice is required, whether a public hearing is required before a decision is made and whether administrative appeals are provided." KCC 20.20.020.A. The code sets out, in a table format, the appeal process according to the type of permit decision. *See* KCC 20.20.020.E. Permit decisions such as the one issued for construction of the Fanfant radio tower are "Type 1" decisions "made by the director, or his or her designee, ("director") of the department of permitting and environmental review ("department") and are "nonappealable administrative decisions." KCC 20.20.020.A.1; KCC 20.20.020.E. Once a Type I decision is issued, no further administrative appeal is available and challenges to the decision must be brought under LUPA. "The issuance of a permit may qualify as a final land use decision if there is *not* a way to administratively appeal the permit under the applicable code." *Durland*, 182 Wn.2d at 64 (citing *Chelan County v.*

Nykreim, 146 Wn.2d 904, 927-29, 52 P.3d 1 (2002)) (emphasis in original).

The Kovskys contend that judicial review under LUPA has become inconsistent and unpredictable and attributes this to the perceived inability to review some permits because they were issued without notice. Petition at 16. But this is not a case where a permit was issued without the requisite notice and any suggestion otherwise is misleading. Moreover, even if the county failed to provide notice, this Court has firmly established that LUPA's deadlines apply and the Kovskys would be barred from relief. *Habitat Watch*, 155 Wn. 2d at 407 ("even illegal decisions must be challenged in a timely, appropriate manner") (citation omitted).

The Kovskys received the notice to which they were entitled based on King County's interpretation of applicable land use codes. Even if King County made an error in its interpretation, failing to timely challenge the decision under LUPA made the decision final. Washington courts have repeatedly and consistently held that even land use decisions that are incorrect or invalid must be timely challenged under LUPA. *See, e.g., Chelan County v. Nykreim*, 146 Wn.2d 904, 52 P.3d 1 (2002); *Wenatchee Sportsmen Ass'n v. Chelan County*, 141 Wn.2d 169, 4 P.3d 123 (2000); *Habitat Watch v. Skagit County*, 155 Wn.2d 397, 407, 120 P.3d 56 (2005).

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2. The Court of Appeals Did Not Deprive King County of its Regulatory Authority to Enforce is Land Use Codes.

The Court of Appeals agreed with King County's interpretation of KCC 21A.26.020(G) as it applied to the Fanfant amateur Ham radio tower after allowing for " 'deference to the agency charged with enforcing an ordinance where the ordinance is ambiguous.' " *Kovsky*, 2018 WL 1801408 *3 (quoting *Asche*, 132 Wn. App. at 797). In doing so the court did not create a "loophole" allowing for construction of amateur Ham radio towers of limitless height in a residential zone in King County; nor does the decision exempt such towers "from any and all land use regulations". Petition at 16-17. To reach such a conclusion one must be persuaded that the court's decision deprives the county of its regulatory authority over land use and building permits. Such a drastic reading of the court's decision is untenable.

KCC 21A.12.030 sets out densities and dimensions for development in residential zones. These development standards include height limits for structures. Exceptions to height limits exist under KCC 21A.12.180 and include "communication transmission and receiving structures…." KCC 21A.12.180.B. King County applied this exception to the Fanfant radio tower. CP 168-170. But the code does not create a blanket exemption for construction of structures of any height. Instead it

gives the county authorization to approve certain structures that exceed height limits imposed by applicable development standards. *See* KCC 21A.12.180 (listed structures "**may** be erected above the height limits" of applicable development standards) (emphasis added).

Such flexibility is needed because permits for amateur Ham radio towers must include consideration of state and federal laws governing licensed amateur radio operation. The Federal Communications Commission has ruled that "local regulations which involve placement, screening, or height of antennas based on health, safety, or aesthetic considerations must be crafted to accommodate reasonably amateur communications, and to represent the minimum practicable regulation to accomplish the local authority's legitimate purpose." PRB-1, 101 F.C.C.2d 952 (1985). CP 158-164. *See also* 47 C.F.R. §97.15(b); RCW 36.32.600 ("No county shall enact or enforce an ordinance or regulation that fails to conform to the limited preemption entitled 'Amateur Radio Preemption, 101 FCC 2nd 952(1985)' issued by the federal communications commission."). Codes such as KCC 21A.12.180 provide a mechanism by which the county can comply with state and federal law.

Moreover, the county's authority to enforce development regulations of minor communication facilities is not limited to KCC ch. 21A.27. For example, under the county's building code it may be

determined that a minor communications facility cannot be constructed in a structurally sound manner due to its height. The Kovskys' overstatement of the impact of the Court of Appeals decision is not enough to establish a substantial public interest and review by this Court is unwarranted.

V. CONCLUSION

As Justice Wiggins reiterated in *Durland*, "the rules must provide certainty, predictability, and finality for land owners and the government." *Durland*, 182 Wn.2d at 60. The Court of Appeals decision properly followed this important guideline and reached the correct conclusion. Accordingly, this Petition for Review should be denied.

DATED this 15th day of June, 2018.

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Respectfully submitted

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