No. 1000171

IN THE WASHINGTON SUPREME COURT

ABBEY ROAD HOMEOWNERS ASSOCIATION; JOHN STILIN; and SHERRY STILIN,

Petitioners,

and

NEIL BARNETT and MANAJI SUZUKI,

Plaintiffs,

v.

CITY OF REDMOND; EASTSIDE RETIREMENT ASSOCIATION; and EMERALD HEIGHTS,

Respondents.

CITY OF REDMOND'S ANSWER TO PETITION FOR REVIEW

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A. INTRODUCTION

City of Redmond ("City") technical staff spent years analyzing Emerald Heights Retirement Community's ("Emerald Heights") proposal to expand its facilities and working to mitigate the project's effects on the local community. During this process, Emerald Heights implemented many changes. These included changing the colors to match the surrounding neighborhood, changing architectural details to enhance the building's residential appearance, and increasing the planned landscaping alongside the street. With these and other changes, the City found that the project involved no significant adverse environmental impacts and issued a determination of non-significance ("DNS") under the State Environmental Policy Act ("SEPA"). After a lengthy hearing, the City's Hearing Examiner affirmed.

In its unpublished opinion, Division I of the Court of Appeals gave proper deference to the Hearing Examiner's findings. Following well-developed standards for judicial review under the Land Use Petition Act ("LUPA"), Division I concluded that there was no clear error in the Hearing Examiner's ruling.

Other than arguing that Division I was wrong, petitioners Abbey Road Homeowners Association *et al* ("Abbey Road") have not explained

why this Court should expend its resources reviewing Division I's decision. Abbey Road mentions RAP 13.4(b)(1) but fails to identify any aspect of Division I's decision that conflicts with any authority of this Court. It also mentions RAP 13.4(b)(4) but fails to explain how this unpublished decision, involving the location of a single building, can reasonably be construed as affecting a substantial public interest.

This Court should deny review.

B. IDENTITY OF RESPONDENT

The City opposes the petition for review.

C. STATEMENT OF THE CASE

The facts of this case are accurately set out in Division I's opinion. Op. at 2–6. The dispute centers on Emerald Heights' proposal to construct an assisted-living building (the "AL Building") on its campus. Abbey Road contests the AL Building mainly because of its proximity to the edge of the campus, across 176th Ave NE from Abbey Road.

When the City approved the Emerald Heights development in 1988, the property was zoned R-4. Because the project included buildings that exceeded the R-4 height limits, the City conditioned approval on limiting construction to the center of campus. CP 10761. The zoning was changed

in 2011 to R-6, an intensification of the prior zoning. CP 3165, 11184–85, 11188–91. The Hearing Examiner, the superior court, and Division I all agreed that the rezone extinguished the prior conditions. Op. at 9.

The City began reviewing the proposal at issue here in 2016. The Redmond Design Review Board ("DRB"), a body of design professionals and residents, reviewed the project at least nine times from 2016 to 2018. CP 10796. During this review, Emerald Heights modified the project to accommodate DRB and public feedback, including, for the AL Building: (1) shifting two thirds of the building 8 feet farther back from the property line; (2) stepping the upper two floors of the remaining third of the building back five feet; (3) retaining additional mature trees and removing a walking trail between the building and 176th Ave NE to accommodate more trees; (4) adding trees and increasing tree size at planting to increase landscape screening; (5) removing two assisted-living units from the building's most visible corner to reduce its apparent scale from the street; and (6) revising the building design to incorporate more traditional and darker-colored siding materials, roof parapets, eaves overhangs, window bays, sloped roofs, and roof soffits, to enhance the building's residential feel. CP 10773.

In July 2018, the City Technical Committee, the City's SEPA Responsible Official, issued a DNS for the project. CP 10763. Because of

the DNS, Emerald Heights was not required to prepare an environmental impact statement ("EIS"). Abbey Road appealed the DNS to the Hearing Examiner. CP 10748. That appeal was consolidated with Emerald Heights' request for a conditional use permit ("CUP"), an action that is heard by the Hearing Examiner in the first instance. CP 10759.

The Hearing Examiner conducted a three-day hearing that included public comment, witness testimony, and a site visit in which the Hearing Examiner visited both the Emerald Heights campus and the Abbey Road neighborhood. In a carefully considered 104-page ruling, the Hearing Examiner found, *inter alia*, that the Project was compatible with the Abbey Road neighborhood, citing many of the modifications to style, colors, setbacks, buffer, etc., established during the City's review. CP 10822. She found further that the landscaping will provide 80% sight-obscuring screening at the time of planting. CP 10817.

Ultimately, the Hearing Examiner was "not persuaded that being able to see multifamily buildings through a vegetated buffer constitutes significant adverse environmental impact." CP 10816. The Hearing Examiner thus affirmed the DNS and approved the CUP. CP 10824.

Abbey Road appealed under LUPA. The superior court reversed, finding "a reasonable likelihood of more than a moderate adverse impact on

aesthetics, et al, with the view of the buildings replacing the view of the trees and all that flows from that replacement." CP 1377. Division I then reversed the superior court, holding that Abbey Road failed to show any clear error in the Hearing Examiner's ruling.

D. ARGUMENT WHY REVIEW SHOULD BE DENIED

Abbey Road asks this Court to accept review under RAP 13.4(a)(1) and (4). These provisions require Abbey Road to establish that Division I's decision either is "in conflict with a decision of the Supreme Court" or "involves an issue of substantial public interest." RAP 13.4(a)(1), (4). Abbey Road has not established either proposition.

1. Abbey Road fails to identify any conflict with any decision of this Court.

Regarding RAP 13.4(a)(1), Abbey Road has not identified any conflict with this Court's precedent. Abbey Road asks this Court to review two issues: (1) the standard of review under SEPA and (2) the legal framework for issuing a DNS. Abbey Road cites only a few decisions from this Court in each argument and does not establish that any of those decisions are inconsistent with Division I's decision.

a. Division I applied the "clearly erroneous" standard consistently with this Court's precedent.

Abbey Road first argues that this Court should grant review "to confirm the proper standard for 'clearly erroneous review.'" Pet. at 7 (citing RAP 13.4(b)(1), (4)). Notably, there is no dispute that "clear error" is the appropriate standard of review. *Norway Hill Preservation & Protection Ass'n v. King Cty. Council*, 87 Wn.2d 267, 274–76, 552 P.2d 674 (1976). Abbey Road simply disagrees with how Division I applied that test.

In that discussion, Abbey Road cites exactly four decisions of this Court. It begins with this Court's instruction that, in reviewing local land use decisions, the Court of Appeals "stands in the shoes of the superior court," in *HJS Dev., Inc. v. Pierce County ex rel. Dep't of Planning & Land Servs.*, 148 Wn.2d 451, 468, 61 P.3d 1141 (2003). It then cites the statement that the "clearly erroneous" standard is "extremely broad," in *Sisley v. San Juan County*, 89 Wn.2d 78, 84, 569 P.2d 712 (1977). It notes that the "clearly erroneous" test involves a "critical review" that is "more intense" than the "arbitrary and capricious standard," citing *Swinomish Indian Tribal Cmty. v. W. Wash. Growth Mgmt. Hearings Bd.*, 161 Wn.2d 415, 435 n. 8, 166 P.3d 1198 (2007). And it claims that courts "must 'ensure that an appropriate balance between economic, social, and environmental values is

struck,'" quoting *Polygon Corp. v. City of Seattle*, 90 Wn.2d 59, 578 P.2d 1309 (1978).

None of these principles conflict with Division I's decision. Abbey Road argues that the superior court's review was thorough and careful and that "Division I should have treated that court's analysis as more than mere cypher." Pet. at 5. But standing in the shoes of the superior court means that the "appellate court reviews administrative decisions on the record of the administrative tribunal, not of the superior court." *HJS*, 148 Wn.2d at 468 (citing *King Cty. v. Washington State Boundary Review Bd. for King Cty.,* 122 Wn.2d 648, 672, 860 P.2d 1024 (1993)). To the extent Abbey Road is suggesting that Division I should have given deference to the superior court, it fails to cite any authority for that proposition.

To the contrary, the cases cited by Abbey Road establish that the courts must give deference to the Hearing Examiner. *See*, *e.g.*, *Polygon*, 90 Wn.2d at 69 (under the "clearly erroneous" standard, the "court does not substitute its judgment for that of the administrative body"). Such deference is necessary because the legislature requires courts to give "substantial weight" to local SEPA determinations. RCW 43.21C.090.

It is true that the clearly erroneous standard calls for greater scrutiny than was due under the arbitrary and capricious standard—the standard used

under SEPA before *Norway Hill* was decided. *See Norway Hill*, 87 Wn.2d at 273–74 (applying clearly erroneous standard); *cf. Narrowsview Pres. Ass'n v. City of Tacoma*, 84 Wn.2d 416, 423, 526 P.2d 897 (1974) (applying arbitrary and capricious standard). But agency action is arbitrary and capricious only if it is willful and unreasoning and taken without regard to the attending facts or circumstances. *Rios v. Dep't of Labor & Indus.*, 145 Wn.2d 483, 501, 39 P.3d 961 (2002). Simply put, a standard can be less deferential than "arbitrary and capricious" and still be deferential.

Further, when *Sisley* stressed the breadth of review, it was referring to what the court may review under SEPA. *Sisley*, 89 Wn.2d at 84. And while the "clearly erroneous" standard may be "broad," the courts of this state have long agreed that it is deferential. *See*, *e.g.*, *City of Airway Heights v. E. Wash. Growth Mgmt. Hr'gs Bd.*, 193 Wn. App. 282, 304–05, 376 P.3d 1112 (2016) (Division III describing "clearly erroneous" as a "deferential standard of review") (citing *Quadrant Corp. v. Cent. Puget Sound Growth Mgmt. Hr'gs Bd.*, 154 Wn.2d 224, 238, 110 P.3d 1132 (2005)); *Willapa Bay Oyster Growers Ass'n v. Moby Dick Corp.*, 115 Wn. App. 417, 429, 62 P.3d 912 (2003) (Division II holding that its "review is deferential to factual determinations by the highest forum below that exercised fact-finding authority") (citing *Schofield v. Spokane County*, 96 Wn. App. 581, 586, 980

P.2d 277 (1999)). As the 7th Circuit put it, to be clear error, a decision must strike the appellate court "as wrong with the force of a five-week-old, unrefrigerated dead fish." *Parts and Elec. Motors, Inc. v. Sterling Elec., Inc.*, 866 F.2d 228, 233 (1988).

To further illustrate the deferential nature of this review, the three parties to this appeal have uncovered only one Washington case in which an appellate court overturned a local jurisdiction's finding of non-significance based on aesthetic impacts. *See Sisley*, 89 Wn.2d at 84. In that case, this Court based its decision largely on procedural irregularities, not on the significance issue alone. *See id*. at 87.

As for *Polygon*'s statement that a balance among economic, social, and environmental values must be struck, applying the "clearly erroneous" standard implements that policy. This becomes clear when the portion quoted by Abbey Road is read in context:

> We believe that this potential for abuse, together with a need to ensure that an appropriate balance between economic, social, and environmental values is struck, requires a higher degree of judicial scrutiny than is normally appropriate for administrative action. Consequently, in order that there be a broad review, we apply the clearly erroneous standard to the superintendent's denial of Polygon's building permit.

Polygon, 90 Wn.2d at 69 (emphasis added). This Court did not say that a separate examination of economic, social, and environmental values is required in every case. It merely said that harmonizing these values requires application of the "clearly erroneous" standard.

Abbey Road attempts to manufacture a conflict with the above authority by claiming that Division I "deferred entirely" to the Hearing Examiner. Pet. at 5. That characterization cannot be squared with Division I's written opinion. Division I discussed the competing arguments and evidence and considered whether the Hearing Examiner's decision was supported by "substantial evidence," as required by statute. Op. at 7 (citing RCW 36.70C.130(1)(c)). In so doing, it viewed the facts and inferences in the light most favorable to the party that prevailed before the Hearing Examiner, consistent with this Court's precedent. *Phoenix Dev., Inc. v. City of Woodinville*, 171 Wn.2d 820, 828–29, 256 P.3d 1150 (2011) (facts and inferences must be viewed "in a light most favorable to the party that prevailed in the highest forum exercising fact-finding authority") (citing *Woods v. Kittitas County*, 162 Wn.2d 597, 617, 174 P.3d 25 (2007)). And it concluded that Abbey Road did not establish any clear error.

Abbey Road's disagreement with that conclusion does not establish a conflict with any decision of this Court.

b. The factors considered by Division I were consistent with this Court's precedent.

Abbey Road also argues that Division I's decision conflicts with "this Court's precedents for the critical first step in the SEPA process." Pet. at 8. In this section, however, Abbey Road mainly argues about alleged conflicts with SEPA regulations. In other words, Abbey Road's main argument is not that the decision conflicted with this Court's precedent, but rather simply that Abbey Road disagrees with how Division I applied the regulations. In its six grievances about that analysis, Abbey Road purports to identify a conflict with this Court's authority in only three.

First, Abbey Road cites this Court in discussing "significant adverse environmental impacts that cannot be mitigated in the short term." Pet. at 11. Abbey Road quotes the statement that an EIS "must consider a host of matters, including … short and long term consequences," in *Eastlake Cmty. Council v. Roanoke Assocs., Inc.*, 82 Wn.2d 475, 493, 513 P.2d 36 (1973). Abbey Road also claims that this Court approved the consideration of a project's "immediate impacts" in *Polygon*, 90 Wn.2d at 68–69.

Abbey Road tries to fabricate a conflict between this authority and Division I's discussion of the vegetated buffer. Abbey Road claims that Division I and the Hearing Examiner considered only the extent to which trees would mitigate views of the new building once they are fully grown

and did not consider the impacts that would exist in the intervening years. Pet. at 11–12. That characterization is not accurate.

Division I acknowledged Abbey Road's various arguments about the sufficiency of vegetated screening. These included "that some of the trees are deciduous and will lose their leaves in the winter" and "that the evergreen trees that will be planted as part of the project will not be tall enough at the time of planting to provide full screening." Op. at 10 n. 3. Division I also noted that the Hearing Examiner considered countervailing testimony and, ultimately, "found that the proposed landscaping buffer would provide sufficient screening." *Id*. Regarding nighttime lighting, Division I noted evidence that the light would be filtered not only by the vegetated buffer, but also by blinds and curtains at the AL Building and vegetation on Abbey Road's side of the street. Op. at 11.

In short, it is not true that Division I ignored evidence of short-term impacts. The Hearing Examiner considered Abbey Road's evidence about how long it would take the trees to reach full height, as well as other evidence both for and against the effectiveness of the vegetated buffer. Division I considered this same evidence and properly concluded that the Hearing Examiner did not clearly err.

Second, Abbey Road mentions this Court's authority in discussing "adverse environmental impacts adding to pre-existing environmental impacts." Pet. at 15. According to Abbey Road, "this Court has held that a critical factor for determining the significance of an environmental impact is 'the extent to which the action will cause adverse environmental effects *in excess of* those created by *existing* uses in the area.'" Pet. at 16 (alterations in original) (quoting *Norway Hill*, 87 Wn.2d at 277). Abbey Road also cites this Court's statement that the "cumulative impact from other similar projects may be taken into account." *Id*. (quoting *Polygon*, 90 Wn.2d at 69–70) . From this language, Abbey Road extrapolates that it was improper for Division I and the Hearing Examiner to consider the fact that there are other large buildings in the neighborhood.

But Abbey Road takes the discussion of other buildings out of context. Division I raised this point in addressing Abbey Road's argument that "the size and scope of the project is simply incongruous with the rest of the neighborhood." Op. at 10. Division I explained that, in evaluating this argument, the Hearing Examiner considered the fact that the building height complied with applicable code limits, the degree to which the view would be obstructed by vegetation, and the fact that the neighborhood contains other large buildings. *Id*.

Abbey Road fails to explain how a court could resolve a claim that a project will be incongruous with other structures in the neighborhood, without comparing the project to the neighborhood's other structures. Nothing in *Norway Hill* or *Polygon* supports such an illogical approach. Indeed, in *Polygon*, this Court necessarily considered whether there were similar existing structures when it observed that a proposed 13-story condominium building "would have been totally out of scale with other structures in the neighborhood." *Polygon*, 90 Wn.2d at 70. Division I correctly concluded here that it was not clearly erroneous for the Hearing Examiner to follow that same approach.

Finally, Abbey Road mentions this Court's authority in its arguments about "precedent for future development." Pet. at 17. It argues that "this Court has construed SEPA as allowing the agency to consider '[a] proposed project's potential for creating pressure to alter *surrounding* land use.'" *Id*. (alterations in original) (quoting *Polygon*, 90 Wn.2d at 69–70) . And it claims that significant environmental impacts may be found from "probable" future additional development. *Id*. (quoting *King Cty.*, 122 Wn.2d at 664). Abbey Road purports to find a conflict by claiming that "Division I's opinion focused only on the future development potential for the proposal's specific site." *Id*.

On this point, Abbey Road ignores that Division I was simply addressing the arguments as framed by Abbey Road. *See* Op. at 12. Nowhere in Abbey Road's briefing to Division I did it discuss the potential for development on other properties. Rather, it argued only that this project would be used as precedent for future development on the Emerald Heights campus. It theorized that future demand would increase Emerald Heights' need for additional development. And it claimed that if the current proposal is approved, "Emerald Heights will rely on the location, scale, and design of the Assisted Living building in the future…."[1]

Abbey Road cannot create a conflict with this Court's precedent by complaining that Division I did not address arguments that Abbey Road never advanced.

Abbey Road thus has not met the standards under RAP 13.4(b)(1).

2. Abbey Road fails to establish an issue of substantial public interest.

As for RAP 13.4(b)(4), it is unclear how Abbey Road believes this matter triggers a substantial public interest. This Court identified "a prime example of an issue of substantial public interest" in *State v. Watson*, 155 Wn.2d 574, 577, 122 P.3d 903 (2005). There, the Pierce County

[1] Amended Brief of Respondent/Cross Appellant, at 48, Case No. 80999-7-I, May 4, 2020.

Prosecuting Attorney had circulated a memorandum to all Pierce County Superior Court judges. *Id*. at 575. The memorandum established the Prosecuting Attorney's position on a matter relating to sentencing. *Id*. at 575–76. In a published holding, Division II described the letter as an improper *ex parte* communication. *Id*. at 576. Noting that this holding had "the potential to affect every sentencing proceeding in Pierce County" after the date of the letter, this Court granted review because of "the sweeping implications of the Court of Appeals decision." *Id*. at 577–78.

Abbey Road has not identified any similar sweeping implications in Division I's decision here. It is an unpublished opinion relating to where, on a single landowner's property, a single building will be sited.

Abbey Road's argument appears to be that because "decades have passed since this Court last addressed the legal standards" under SEPA, and because "urban development is booming," this Court should grant review to provide guidance about the applicable standard of review and legal framework. Pet. at 1. In other words, Abbey Road does not contend that Division I decided an issue of substantial public interest. It merely argues that the case could be a vehicle for this Court to provide guidance about an area of law that interests the public.

But Abbey Road has not identified any aspect of Division I's decision that necessitates such guidance. As discussed above, the "clearly erroneous" standard is well-developed. Abbey Road's disagreement with how Division I applied it does not create a matter of substantial public interest.

Abbey Road identifies various "facets of the legal framework for SEPA threshold determinations for urban development proposals" that it believes this Court should consider. Pet. at 11. But, again, Abbey Road's arguments amount to nothing more than claiming that Division I was wrong. None of these arguments establish any "sweeping implications" in Division I's holding. *Watson*, 155 Wn.2d at 577–78.

For example, Abbey Road asks this Court to consider the "legal relevance of a developer's claim that alternative sites would be unbuildable." Pet. at 13. Abbey Road argues that the viability of alternative sites should be considered in the EIS analysis and should not be a basis for issuing a DNS. As Division I observed, however, the Hearing Examiner found that alternative sites on Emerald Heights' campus were not buildable. Abbey Road assigned error to that finding but did not support its assignment with any argument. Op. at 9. "Unchallenged findings are verities on appeal." *Robel v. Roundup Corp.*, 148 Wn.2d 35, 42, 59 P.3d 611 (2002)

(citing *State v. Stenson*, 132 Wn.2d 668, 697, 940 P.2d 1239 (1997)). It is now a verity that other locations on Emerald Heights' campus, where Abbey Road argued the AL Building would have less environmental impact, were not buildable. Abbey Road thus cannot show that deferring that determination to the EIS stage would have made any difference in this case—let alone that it would have any far-reaching implications.

Abbey Road also asks this Court to consider the "context for determining whether a proposed urban development will result in probable and significant environmental impacts." Pet. at 14. But Abbey Road's arguments on this point are merely about the merits of the case. Abbey Road simply argues that the views of the buildings on Emerald Heights' campus have historically been obscured by vegetation, that the AL Building will not be completely obscured, and that this is a significant adverse impact. The Hearing Examiner disagreed, and Division I held that this conclusion was not clearly erroneous. Abbey Road's dissatisfaction with that result does not create a substantial public interest.

As another example, Abbey Road asks this Court to consider how "the SEPA threshold determination should account for other land use regulations." Pet. at 18. Abbey Road argues: (a) that it is wrong to issue a DNS based on a finding that local rules and regulations adequately address

a project's impacts; and (b) that SEPA requires agencies to review each project and attach appropriate conditions on a case-by-case basis.

But the legislature plainly mandates that a local jurisdiction's "environmental analysis, protection, and mitigation measures … provide adequate analysis of and mitigation for the specific adverse environmental impacts" of a project, if the project's "specific impacts are adequately addressed by the development regulations or other applicable requirements of the comprehensive plan, [etc.]" RCW 43.21C.240(1), (2)(a). SEPA regulations require agencies to "consider whether local, state, or federal requirements and enforcement would mitigate an identified significant impact" before requiring mitigation measures. WAC 197-11-660(1)(e). The City thus merely followed the law when it considered the effectiveness of local regulations.

In any event, the City reviewed the proposal here individually. Many changes were made to the project during the City's review to lessen the project's impacts and improve its aesthetics. CP 10773. Thus, even if RCW 43.21C.240 were unclear, this case does not properly raise the issue of whether such individualized review is required.

Similar deficiencies plague Abbey Road's other grievances. Whether the Hearing Examiner properly considered tree size at planting,

other big buildings in the neighborhood, or precedent for future growth outside the campus are merely arguments about the merits—not matters needing this Court's review.

E. CONCLUSION

Division I showed proper deference to the Hearing Examiner's findings and correctly concluded that the Hearing Examiner did not clearly err. Abbey Road has not shown that Division I's decision conflicts with this Court's precedent or that this dispute involves an issue of substantial public interest. This Court should therefore deny review.

RESPECTFULLY SUBMITTED this 23rd day of August, 2021.

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CERTIFICATE OF SERVICE

On said day below I electronically served a true and accurate copy of the City of Redmond's Answer to Petition for Review in the Supreme Court of Washington, Cause No. 1000171 to the following parties:

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I declare under penalty of perjury under the laws of the State of Washington and the United States that the foregoing is true and correct.

Dated this 23rd day of August, 2021 at Seattle, Washington

Bonnie Rakes

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August 23, 2021 - 4:22 PM

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