ORIGINAL

No. 48706-3-II

COURT OF APPEALS
DIVISION II

NORTH QUINAULT PROPERTIES, LLC, a Washington limited liability company; THOMAS LANDRETH, an individual, and BEATRICE LANDRETH,

Appellants,

v.

STATE OF WASHINGTON, PETER GOLDMARK, in his official capacity as Commissioner of Public Lands,

Respondent.

APPELLANTS' REPLY BRIEF

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I. INTRODUCTION

Appellants are a group of property owners and Washington State citizens who own property on or near Lake Quinault. Appellants seek review of the superior court's order granting a motion for summary judgment dismissing the Appellants' claims.

II. REPLY TO ARGUMENT

A. Neither the Nation nor the United States is a necessary and indispensable party.

The Respondent alleges that the Quinault Nation (and the United States, as Trustee for the Nation) is a necessary and indispensable party, despite the fact that the relief requested pertains solely to the action or inaction of the State of Washington and despite the fact that the Nation has no actual legal interest in Lake Quinault and the Respondent can cite to no authority supporting any such legal interest.

A party is necessary if (1) the trial court cannot make a complete determination of the controversy without that party's presence; (2) the party's ability to protect its interest in the subject matter of the litigation would be impeded by a judgment in the case; and (3) judgment in the case necessarily would affect the party's interest. *Town of Ruston v. City of Tacoma, 90 Wn.App. 75, 82, 951 P.2d 805 (1998).*

The Respondent's allegation that the Nation is a necessary party is

predicated upon the unsupported claim that the Nation has a "beneficial interest" in the lake. Without said interest, there is no basis for alleging that the Nation is a necessary party. The fact that the Nation has usurped the State's jurisdiction with regard to the lake does not materialize into a "beneficial interest", regardless of whether the Nation perceives it as such.

In fact, Lake Quinault was not included in the initial survey of the expansion of the reservation boundary. The lake is only mentioned as it pertains to the metes and bounds of the reservation – there was no express granting of any rights to the lake itself. Lake Quinault is a navigable waterway and as such, falls within the purview of the equal footing doctrine.

It is a matter of law that a navigable waterway located within the boundaries of a reservation does not belong to the tribe. *U.S. v. Holt State Bank, 270 U.S. 49, 57, 46 S.Ct. 197, 70 L.Ed. 465 (1926).* There is no evidence to support the allegation that the Nation has an interest in the lake such that it is a necessary and indispensable party to this civil action. A ruling that the Nation is a necessary and indispensable party would impermissibly be based upon the Nation's unsubstantiated and blatantly false statements that it has jurisdiction over the lake.

The first element to be considered is whether a court can make a complete determination of the controversy without the Nation's presence as a party. The controversy presented in this matter is whether the Respondent

State of Washington has failed to uphold its obligation to the public and the citizens of the State pursuant to the public trust doctrine by failing to maintain the public's access to Lake Quinault for navigation, commerce and recreation.

If the trial court finds that the State has failed to uphold this obligation, its ruling would require the State to maintain access to the lake for the public. This would not necessarily infringe upon the Nation or its use of the lake. The Respondent's statement that the Appellants' relief, if granted, would necessarily require the State to take some form of enforcement action against the Nation is unsubstantiated and not correct. There are numerous scenarios whereby relief, if granted, would have no impact upon the Nation's current use and access to the lake. The unspoken assertion by the State is that it is somehow necessary for the Nation to have unfettered, exclusive access to the lake – which is not the case. The relief requested would simply require that public access be permitted and maintained. Such relief does not, by implication, require that "enforcement action" be taken against any entity or party – this is posturing by the State.

The second element to be considered by is whether the Nation's ability to protect its interest in the subject matter of the litigation would be impeded by a judgment in the case. *Town of Ruston v. Tacoma, 90 Wn.App. 75, 82, 951 P.3d 805 (1998).* This begs the question, what "interest" has

the Nation established with regard to the "subject matter" of this litigation. The "subject matter" of the litigation is whether the State has met its statutory and constitutional obligations with regard to the public trust doctrine and access to public waters. In other words, the subject matter is narrowly tailored to apply solely to the State. Any decision as to whether or not the State has met its statutory and constitutional obligations cannot possibly be determinative as to any "interest" of the Nation.

The third element to be considered is whether judgment in the case necessarily would affect the party's interest. *Town of Ruston v. Tacoma, 90 Wn.App. 75, 82, 951 P.3d 805 (1998).* If the court ruled that the State failed to uphold its obligations, such a ruling would not "necessarily affect" the Nation's interest. First, the Nation has no express interest to the lake under the law. Furthermore, a ruling in favor of the Appellants would only require public access to the lake to be maintained by the State. It would not require that the Nation's alleged "interest" be altered in any way. If the State intends to imply, in its brief, that the Nation would no longer be able to issue proclamations and regulations restricting the public's right to access, these proclamations and regulations have had no basis under law and have been an unfettered infringement upon the State's interests.

The State relies upon *Bainbridge Citizens United v. DNR, 147 Wn.App. 365, 198 P.3d 1033 (2008)* to support its allegation that the Nation

is a necessary party; however, *Bainbridge Citizens* is distinguishable upon its facts. In *Bainbridge Citizens*, a citizen's group sought a declaration under the UDJA that DNR had failed to enforce its own regulations by not ejecting alleged trespassers on state-owned aquatic lands. *Bainbridge Citizens United v. DNR, 147 Wn.App. 365, 369, 198 P.3d 1033 (2008).* However, in *Bainbridge Citizens*, the lawsuit itself was directed at the trespassers specifically, and the relief sought was intended to deprive the trespassers of a colorable interest. As the *Bainbridge* court noted, the Plaintiff's "**sole purpose in this lawsuit was to force the Department to evict, fine, and sue the vessel owners. Accordingly, the vessel owners were necessary parties.**" *Bainbridge Citizens United v. DNR, 147 Wn.App. 365, 373, 198 P.3d 1033 (2008)(emphasis added).* In the instant case, if the requested relief is granted, no evictions, fines or suits will result against the Nation.

Similarly, in *Northwest Greyhound Kennel Ass'n, Inc. v. State, 8 Wn.App. 314, 506 P.2d 878 (1973)* the party found to be necessary and indispensable was the persons "who are presently licensed under the act [who] would have their existing right to race horses . . . . . destroyed if the relief sought in this action were granted." *Northwest Greyhound Kennel Ass'n, Inc. v. State, 8 Wn.App. 314, 319, 506 P.3d 878 (1973).* In other words, the parties in question had legal and indisputable rights through

licensing. This is distinguishable from the self-asserted and unsubstantiated "rights" the Nation alleges to a State-owned navigable waterway.

B. The Appellants are entitled to the declaratory relief requested pursuant to RCW 7.24.010 and RCW 7.24.050.

The Respondent argues that because the Appellants are not challenging the validity or construction of the statutes under which they seek relief, they are not subject to relief under the UDJA. The Respondent cites to RCW 7.24.020 for that proposition. However, the Respondent construes RCW 7.24 too narrowly. To the contrary, the Appellants are entitled to relief pursuant to the UDJA. RCW 7.24.010 states:

> **Authority of courts to render.**
>
> Courts of record within their respective jurisdictions shall have power to declare rights, status and other legal relations whether or not further relief is or could be claimed. An action or proceeding shall not be open to objection on the ground that a declaratory judgment or decree is prayed for. The declaration may be either affirmative or negative in form and effect; and such declarations shall have the force and effect of a final judgment or decree.

RCW 7.24.010 (2016).

RCW 7.24.050 states:

> **General powers not restricted by express enumeration.**
>
> The enumeration in RCW 7.24.020 and 7.24.030 does not limit or restrict the exercise of the general powers conferred in RCW 7.24.010 in any proceeding where declaratory relief is sought, in which a judgment or decree will terminate the controversy or remove an uncertainty.

RCW 7.24.050(2016).

In other words, RCW 7.24.020 does not limit the court's authority to issue declaratory relief where a judgment or decree will terminate the controversy or remove an uncertainty. In the instant case, the declaratory relief requested by the Appellants (i.e., declaring that Lake Quinault is a navigable waterway and a public trust resource; that the State has breached its duty by failing to protect the public's access to the lake) would terminate the controversy over the status of Lake Quinault as a navigable waterway and public trust resource and would remove the uncertainty that has lingered for decades concerning the State's role with regard to the lake.

Ultimately, the UDJA gives the court authority to declare rights, status and other legal relations of the parties. *See RCW 7.24.010 (2016).* Pursuant to RCW 7.24.050, the court has the authority and jurisdiction to provide the declaratory relief sought by the Appellants.

C. The Appellants' request for relief pursuant to the Writ of Mandamus seeks relief on mandatory obligations and not on discretionary acts.

The public trust doctrine is a recognition of the sovereign right of the individual states to protect inviolable public entitlements associated with navigable waterways, among other natural resources. Implicit in the doctrine is the fundamental notion that a State may not alienate or otherwise

diminish to private or non-public entities the public interest in navigable waterways. *See, e.g., A. Reid Allison III, THE PUBLIC TRUST DOCTRINE IN WASHINGTON, University of Puget Sound Law Review, Vol. 10:633, 638 (1987).* The public trust doctrine concerns the public's right to navigation and the incidental rights of fishing, boating, swimming, waterskiing and other related recreational uses of public waters. *Caminiti v. Boyle, 107 Wn.2d 662, 669, 732 P.2d 989 (1987)(quoting Wilbour v. Gallager, 77 Wn.2d 306, 316, 462 P.2d 232 (1969)).*

The Washington State Constitution declares state ownership of the beds and shores of all navigable waters. *See Wash.Const. art. XVII.* This language was a formal declaration by the people of rights which the State possessed by virtue of its sovereignty. *Caminiti v. Boyle, 107 Wn.2d 662, 666, 732 P.2d 989 (1987).* The public policy expressed in the Constitution is consistent with public trust principles, the State reserving complete ownership in the beds and shores of navigable waters including Lake Quinault.

Washington State legislation reiterates and underscores the importance of the doctrine and the mandatory duties that the State maintains as part of the doctrine. RCW 79.105.010 states in pertinent part:

Aquatic lands – Findings.

The legislature finds that state-owned aquatic lands are a

> finite natural resource of great value and an irreplaceable public heritage. **The legislature recognizes that the state owns these aquatic lands in fee and has delegated to the department the responsibility to manage these lands for the benefit of the public**.
>
> RCW 79.105.010 (2016) (emphasis added).
>
> RCW 79.105.030 states in pertinent part:
>
> **Aquatic lands – Management guidelines**
>
> The management of state-owned aquatic lands **shall be in conformance with constitutional and statutory requirements**. The manager of state-owned aquatic lands shall strive to provide a balance of public benefits for all citizens of the states.
>
> RCW 79.105.030 (2016) (emphasis added).
>
> RCW 79.105.050 states:
>
> **Fostering use of aquatic environment – Limitation**
>
> The department **shall foster** the commercial and recreational use of the aquatic environment for production of food, fibre, income, and **public enjoyment** . . . .
>
> RCW 79.105.050 (2016) (emphasis added).

The mandatory duties associated with the public trust doctrine and the State's ownership of navigable waterways are evident in the statutory language and the use of the word "shall."

Case law further supports the mandatory nature of the public trust doctrine. In *Hill v. Newell, 86 Wash. 227, 149 P. 951 (1915)*, the court approved the reasoning of the leading California public trust case. *Hill v.*

Newell, 86 Wash. 227, 149 P. 951 (1915) (referencing People v. California Fish Co., 166 Cal. 576, 138 P. 79 (1913)). In *State v. Sturtevant*, the court acknowledged that the State held the right of navigation "in trust for the whole people of this state." *State v. Sturtevant, 76 Wash. 158, 135 P. 1035 (1913). See also Caminiti v. Boyle, 107 Wn.2d 662, 732 P.2d 989 (1987).*

In Caminiti, the court stated:

> The state can no more convey or give away this *jus publicum* interest than it can "abdicate its police powers in the administration of government and the preservation of the peace." Thus it is that the sovereignty and dominion over this state's [navigable waterways], as distinguished from title, always remains in the state, and the state holds such dominion in trust for the public. It is this principle which is referred to as the "public trust doctrine". Although not always clearly labeled or articulated as such, our review of Washington law establishes that the doctrine has always existed in the State of Washington.

Caminiti v. Boyle, 107 Wn.2d 662, 669-70, 732 P.2d 989 (1987)(quoting Illinois Cent. R. Co. v. State of Illinois, 146 U.S. 387, 453, 13 S.Ct. 110, 36 L.Ed 1018 (1892)).

A review of Washington case law regarding the public trust doctrine discloses repeated examination by the courts as to whether the State has abdicated its mandatory duty to protect the public interest in navigable waters. In *Caminiti* the Washington Supreme Court held that RCW 79.90.105 did not violate the public trust doctrine, concluding that the legislature had given up relatively little right of control over the *jus*

publicum. See id. at 665-66, 732 P.2d 989. In *Weden v. San Juan County, 135 Wn.2d 678, 958 P.2d 273 (1998)*, the Washington Supreme Court held that a San Juan County ordinance banning the use of motorized personal watercraft on all marine waters and a lake did not violate the public trust doctrine because the county had not given up control over its waters. *Weden v. San Juan County, 135 Wn.2d 678, 699, 958 P.2d 273 (1998).* The court found that while the ordinance prohibited a particular form of recreation, the waters were open to the entire public, including personal watercraft owners who use other recreational methods. *See id.*

The duties imposed by the public trust doctrine upon the State are mandatory, not discretionary. In *Illinois Central R.R. v. Illinois, 146 U.S. 387 (1892)*, the United States Supreme Court discussed a trust that the court labeled "inalienable" by the legislature. *Illinois Central R.R. v. Illinois, 146 U.S. 387, 453 (1892).* One early example of Washington State legislative action regarding public trust was the enactment in 1927 of the "Public Lands Act." Designating navigable waterways such as tidelands "belonging to or held in trust by the state" as "public lands", the legislature in effect recognized its sovereign responsibility to manage these lands as a valuable natural resource held by the State in trust for its citizens. *WASH. REV. CODE § 79.01.004 (1962).*

Under the public trust doctrine, the Respondent has no discretion:

the interests of the public are paramount and inalienable. This creates a mandatory obligation on the part of the State. In *Caminiti*, the court considered whether the State "**has given up its right of control over the *jus publicum***." *Caminiti v. Boyle, 107 Wn.2d 662, 678, 732 P.2d 989 (1987).* This public property interest requires that the State protect public access to navigable waterways encompassed by the public trust doctrine. *Id. at 668-70, 732 P.2d 989.* A mandatory duty to maintain control over navigable waterways is implicit in the Constitution and the subsequent legislative action.

D. Under CR 19, the Nation and the United States are not indispensable because the relief requested pertains solely to inaction by the State based upon state law.

As discussed above at length, there is no basis for the Nation's alleged interest in the lake. It has been disputed since inception as to the Nation's interest in the lake. The Treaty that granted the Nation a reservation fails to specify any interest or entitlement to Lake Quinault. In 1897, the U.S. Forest Reserve was established by the United States and the reserve included Lake Quinault. A proclamation by President Theodore Roosevelt in 1907 with regard to the U.S. Forest Reserve included a map of the boundary of the reserve and Lake Quinault was clearly depicted as outside the Quinault Indian Reservation and within the Forest Reserve area. *See CP 146.* A map produced by the State outlining Washington Public

Land Sites shows Lake Quinault as located outside the Nation's reservation. *See CP 251.* Accordingly, the State's (and the Nation's) bald, unsupported statements concerning the Nation's alleged "ownership interest" in the lake are insufficient for the purposes of granting a summary judgment motion.

With regard to CR 19, the party urging dismissal bears the burden of persuasion. *Gildon v. Simon Prop. Grp., Inc., 158 Wn.2d 483, 495, 145 P.3d 1196 (2006).* Contrary to the Respondent's assertion, *Automotive United Trades Organization v. State* is on point and illustrative. *Automotive United Trades Organization v. State, 175 Wn.2d 214, 223-24, 285 P.3d 52 (2012).* In *Automotive United*, as in this matter, the State sought dismissal of a case for failure to join Indian tribes, arguing that the tribes were necessary and indispensable parties pursuant to CR 19. *See id.* Although the court concluded that the tribes were "necessary" parties pursuant to CR 19(a)(2)(A), the court further concluded that the tribes could not feasibly be joined due to sovereign immunity. *See id. at 226, 285 P.3d 52.* This is exactly the situation before this Court. The State seeks to the Appellants' case dismissed by alleging that a tribe with sovereign immunity is a necessary and indispensable party. The Washington Supreme Court discussed at some length how sovereign immunity impacted the fourth factor under CR 19: "to what extent a judgment rendered in the person's absence might be prejudicial to him or those already parties." *See id. at*

229, 285 P.3d 52. The court stated: "[i]n evaluating the extent of prejudice, we accord heavy weight to the tribes' sovereign status." *See id. at 229-230, 285 P.3d 52.*

The court in *Automotive United* noted that the extent of prejudice to the tribes was significant, even though the absent tribes would not be bound by the ruling. *See id. at 231, 285 P.3d 52.* However, pursuant to CR 19(b)(4) (absence of any remedy), the court found that the suit might proceed without the tribes because, as in this case, the plaintiffs would be left with no other judicial forum in which to seek relief. *See id. at 232, 285 P.3d 52.* The court stated:

> But "complete justice" may not be served when a plaintiff is divested of all possible relief because an absent party is a sovereign entity. In such an instance, the quest for "complete justice" ironically leads to none at all – an outcome at odds with the equitable purposes underlying compulsory joinder. Nor does our respect for sovereign immunity compel this result. Sovereign immunity is meant to be raised as a shield by the tribe, not wielded as a sword by the State. An absentee's sovereign immunity need not trump all countervailing considerations to require automatic dismissal.
>
> *See id. at 233, 285 P.3d 52.*

The court concluded that the tribes were not indispensable. *See id. at 235, 285 P.3d 52.* This analysis should inform this Court concerning the Appellants' suit. This Court is the Appellants' last resort for relief.

E. A Writ of Mandamus allows the Appellants to seek

affirmative relief against the State concerning the public trust doctrine.

The Respondents argue, without authority, that the Appellants' claim should be dismissed because no court has interpreted the public trust doctrine as allowing a suit against the State for an alleged failure to take action against a third party. However, there is no authority in the jurisprudence concerning the public trust doctrine that would prevent such claims from being brought. The Appellants, as citizens of the State and members of the public, have standing to seek relief under this long-standing doctrine.

Furthermore, RCW 7.16 *et seq.* serves as the mechanism for the Appellants' claim requiring the State to take action. Pursuant to RCW 7.16.150, the court may compel the performance of an act which the law enjoins as a duty resulting from a trust. *See RCW 7.16.150.* The statutory relief, together with the public trust doctrine, serves as the vehicle for the Appellants' claims requiring specific action by the State.

F. The Appellants are entitled to injunctive relief.

The Respondent alleges, again without authority, that the Appellants are not entitled to injunctive relief because they do not have a clear legal or equitable right to relief. In fact, as members of the public and as citizens of the State of Washington, the Appellants have a clear legal and equitable right for injunctive relief. It cannot be disputed that the activities of the

Quinault Indian Nation over the last several years have escalated with regard to restricting the public's access to the lake and recreational opportunities associated with the lake, which establish that the Appellants have a well-grounded fear of immediate invasion of their rights to access to the lake. In May 2007, the Nation mailed out letters asserting ownership of the lake and requiring permission to access the lake and its shores. *See CP 253.* In June, 2013 the Nation demanded that "unpermitted structures" abutting landowners' property along the lake be removed. *See CP 255-256.* In 2014, the Nation imposed rules and regulations concerning access to the lake, stating:

> Lake Quinault is located within the boundaries of the Quinault Indian Reservation and is owned up to the Ordinary High Water Mark (OHWM) entirely by the Quinault Indian Nation (QIN); all persons who enter onto Lake Quinault, within the boundaries of the OHWM, are required to conform to Quinault tribal laws. Violators who resist or refuse to obey will be subject to confiscation of all gear and boats and enforcement under the Quinault Tribal Code in the Quinault Tribal Court at Taholah.
>
> *See CP 258-261.*

Without any intervention by the State, the Nation's efforts to control and restrict access to the lake have increased and become more threatening. Any argument that the Appellants do not have a fear of immediate invasion of their rights cannot be credible.

G. The Respondent's argument concerning Separation of

Powers Doctrine is vague, conclusory and should be denied.

The Respondent's allegation that the Appellants' claims should be dismissed pursuant to the separation of powers doctrine is conclusory and insufficient. As a threshold matter, the Appellants' claims seek nothing more than the performance by the State of duties and obligations that it already has pursuant to common law and statutory law. The Appellants are not seeking actions by the State that do not conform to existing law and, therefore, are already required by the State.

Furthermore, the Respondent fails to demonstrate how, if at all, the relief requested would result in an invasion of the executive branch of government such that the separation of powers doctrine would apply. A court tests for separation of powers violations by asking "whether the activity of one branch threatens the independence or integrity or invades the prerogative of another." *Freedom Foundation v. Gregoire, 178 Wn.2d 686, 696, 310 P.3d 1252 (2013) (citing Brown v. Owen, 165 Wn.2d 706, 718, 206 P.3d 310 (2009))*. The Respondent's only argument is that, somehow, if the Appellants' relief is granted, the trial court would have to step into the shoes of the executive branch to determine how the State should best 'enforce' its laws when an Indian nation is involved. The Respondent frames the issue, once again, based on the following assumptions: (1) that the Nation has a "beneficial ownership interest" in the lake; and (2) that any

relief granted would involve some kind of "enforcement" mechanism against the tribe. In other words, the Respondent's argument presupposes that the Nation has some interest in this navigable waterway that supersedes the State's interest under the public trust doctrine. This is simply unsupported by the evidence (see arguments above).

If the requested relief is granted to the Appellants, it simply requires that the State maintain and provide public access to a navigable waterway within its borders. The Respondent fails to elaborate as to how this would translate into an "enforcement" matter against the Nation.

III. CONCLUSION

Lake Quinault is a navigable waterway entrusted to the Respondent by the federal government upon statehood for the benefit of all Washington State citizens. The Appellants allege that the Respondent has abrogated its mandatory duties under the public trust doctrine.

The State has used a non-party's sovereign immunity (i.e., the Nation) to immunize itself from suit. The trial court erroneously allowed the use of tribal sovereign immunity as a sword wielded by the State – not the tribe – amounting to an obstruction of justice. This is particularly egregious where the State is the trustee for the Plaintiffs (i.e., the citizens).

The Appellants respectfully request that the Court vacate the trial court's Order granting the Respondent's Motion for Summary Judgment by finding that the Nation is not an indispensable party to this case.

Respectfully submitted this ___ day of July, 2018.

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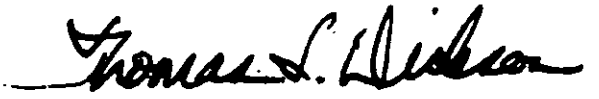

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CERTIFICATE OF SERVICE

Under penalty of perjury of the laws of the State of Washington, I hereby certify that I served the foregoing Appellants' Reply Brief to counsel of record as follows:

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DATED this 19th day of July, 2016.

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