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STATE OF WASHINGTON

No. 35956-1-II

THE COURT OF APPEALS
DIVISION II
OF THE STATE OF WASHINGTON

NEIL TRIEBENBACH, Plaintiff,
and
State of Washington Department
of Fish and Wildlife, WDFW
Respondent.

FILED
COURT OF APPEALS
DIVISION II
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STATE OF WASHINGTON
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DEPUTY

From Clallam County Superior Court
No 03-2-0581-1

Appellant's Brief

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Petition

Request Rulings by Default (Document in the Administrative
Record at pg. 0089 quote at pg. 2 of document specific line 17 of
A.R. pg. 0090).

Requested documentation DOT of occupants at Sunshine Park
in mobile home relocated to a motor home..... 3

INTRODUCTION

WAC 468-100-201 through WAC 468-100-208 prescribes relocation provisions for families displaced from public projects. WAC 468-100-204(1) requires displacing agency to identify and make available at least one dwelling, '*comparable replacement dwelling*' and '*decent, safe and sanitary dwelling,*' before occupant displacement.

WDFW reasoned family's structure, large 5th wheel trailer, WAC 468-100-002(9) made family's 'dwelling' usage, of the trailer ineligible for relocation within WAC 468-100-002(9) and WAC 468-100-505(1).

WDFW decided family eligible for relocation assistance as site 'dwelling,' (Final Order in Administrative Record at pg. 0017 Conclusions of Law 16 & 17.) Agency offers \$5,250.00.

Agencies are to document family's relocation procedure and compliance WAC 468-100-009(1).

I. ASSIGNMENT OF ERRORS

No. 1 WDFW erred relocating family as site 'dwelling'. (Final Order in Administrative Record at pg. 0016 Conclusions of Law 17.)

No. 2 WDFW erred defining that a character of the displaced family's dwelling four years, a 5th wheel trailer, exempted agency from relocating dwelling usage of trailer within WAC 468-100-002(9) and WAC 468-100-505. (Final Order in Administrative Record at pg. 0035 Conclusions of Law 5.)

No. 3 WDFW erred identifying site 'dwellings' outside of commuting distances to work and essential services by RCW 8.26.020(7)(c)&(f) and WAC 468-100-002(5)(d)&(g) .(See Appellant's Memorandum at Superior Court Issue no. 3 Commuting distances begins at page 36 of document) (Final Order in Administrative Record at pg. 0018 Conclusions of Law #17.)

Standard For Review

The order is in violation of constitutional provisions. The order is outside of statutory authority. The agency has failed to follow a prescribed procedure. (Final Order in Administrative Record at pg. 0016 Conclusions of Law #17 and A.R. at pg 0018 Conclusions of Law # 21 and A.R. at pg. 0035 Conclusions of Law # 5.) The agency has erroneously interpreted and applied the law. RCW 34.05.570(3)(a)(b)(c)&(d).

Review

“Errors of Law” standard gives substantial weight to agency’s interpretation although party may substitute its judgment. *Haley v. Medical Disciplinary Board* 117 Wn.2d 720, 818 P.2d 1062 [3] .
When subject not exclusive the agency is not given substantial weight. *Short v. Clallam County* 22 Wn.App 825, 593 P.2d 821[4] .

Due Process

The record (Rule 5.3 Log) being incomplete, compromised or despoiled (Request Rulings by Default { Administrative Record begins at pg. 0089 found on pg. 2 of document line 17 A.R. pg. 0090}) limits review. (Rule 6.1 Contents of Record). A positive ruling may require a new hearing. (Rule 5.4 Loss or Damaged of

Electronic Record). *Guilmont v. Seattle* 77 Wn.App 74, 896 P.2d 70[12].

II. ISSUES

Pertaining to Errors

No 1. There is a *character of property* definition of lodging, license and tenancy. *Lacey Nursing v. Dep't of Revenue* 103 Wn.App 169, 11P.3d 839 [7][13]. WDFW defined tenancy as site 'dwelling' by Latches and Public bathroom. (Final Order in Administrative Record at pg. 0016 Conclusions of Law 17.) Residential tenancy is the exclusive possession and use of real property by building and occupancy codes WAC 468-100-002(7).

No. 2 Definition of displaced dwelling and replacement dwelling within WAC 468-100-002(9) excludes families who live in trailers.

A. Did Legislatures give WDFW authority to classify a family eligibility to be relocated, or not eligible to be relocated, based on character of family's 5th wheel? *Cole v Wn. Util. & Transp. Comm'n* 79 Wn. 2d 302, 485 P.2d 71 [2].

B. Did WDFW interpretation classify groups of citizens and aliens with special privilege and immunity which does not equally belong to all citizens? *Constitution Article I Declaration of Rights*

Section 12.

C. Did WDFW interpret code within the framework of legislated terms and provisions harmonizing the administrative codes and statutes? *In re Electric Lightwave, Inc* 123 Wn.2d 530, 869 P.2d 1045 [3]. *State v. McKinley* 84 Wn. App. 677, 929 P.2d 1145 [7] *Employco Personnel Serv. v. Seattle* 117 Wn.2d 606, 871 P.2d 1062 [1]. *State v O'Neill* 103 Wn.2d 853, 700 P.2d 771 [6]. *Dep't of Transportation v SEIB* 97 Wn.2d 454, 645 P.2d 1076 [3].

D. Is the term 'mobile home' not defined within WAC 468-100-501 interpreted literally, given date of development 1989 and law; *U.S.A. v. 19.7 Acres of Land* 103 Wn.2d 296, 692 P.2d 809 (1984) pg. 299 *Mobile Homes and Mobile Home Parks Sec. 1.5 (L Davis ed. 1975)* "..., not solely as a vehicle or solely as a building, but as a combination of both--not only with the laws of the road but also within those applicable to reality and fixtures."?

Order referenced RCW 46.04.302 to define mobile homes as a structure built before 1976. (Initial Order as referenced in final order in the Administrative Record at pg. 0034 Conclusions of Law #6.) This specific interpretation excludes without exception all other living units. *Cramer v. Van Parys* 7 Wn. App.

584, 500 P.2d 1255 [1] State v. Williams 94 Wn.2d 531, 617

P.2d 1012 [2]. Recreational vehicle within RCW 59.20.030(10)

is defined; "...structure not occupied as a primary residence, and is not immobilized or permanently affixed to a mobile home lot."

Family's trailer was immobilized by insurance and family did not have a motorized vehicle with proper receptacle to move

trailer. (Final Order in Administrative Record at pg. 0011 Findings

of Fact #2.) *State v. Kypreos 110 Wn App. 612, 39 P.3d 371 [11]*

analysis at pg 625, 626.

No 3. Increasing commuting distances impacts family's living -- school, baby-sitter, medical and public transportation ---schedules, time and money. (Final Order in Administrative Record at pg. 0017 Conclusions of Law #20.) (Exhibit in Administrative Record at pg. 00199 Map of site 'dwellings') Laws require new 'dwelling' located within commuting distances and financial means RCW 8.26.020(7)(f)&(c) and WAC 468-100-002(5)(d)&(g). If commuting costs exceeds reasonable apportionment or total family income new site 'dwelling' will impact family existence. (See Appellant's Memorandum at Superior Court Issue no. 3 Commuting distances begins at page no. 36 of document)

III. STATEMENT OF THE CASE

WDFW purchased South Sequim Bay RV Park for a public project. (Final Order in Administrative Record at pg. 0022 first paragraph Nature and Background of the Proceedings.) The family lived four years in a 5th wheel trailer at space number four. (Final Order in Administrative Record at pg. 0011 Findings of Facts # 2.) (Rent Supplement Report in the Administrative Record found at pg. 00175.) The family identified and questioned relocation provisions. (Family's two page letter to WDFW April 3, 2001, identifying 16 relocation concerns and requesting agency relocation blueprint e document in the Administrative Record pg -0215 and again at pg -0549) (Burt Loomis testimony at a hearing in the Administrative Record Page -00337 and also noted as document page 70 at line 8 quote; "*And they were all month-to-month, not permanent residence.*") WDFW issued 30 day notice. (30 day Vacate Notice Bert Loomis May 21, 2001, document in the Administrative Record pg. -00219)

WDFW rationalized; 1. Family dwelt on DOT property by Latches with Public Bathroom, and therefore is a site 'dwelling'. (Final Order in Administrative Record at pg. -0016 Conclusion of

Law #17.) 3. The additional commuting distances are reasonable.
(Final Order in Administrative Record at pg. --0017 Conclusion of
Law #20.)

IV. SUMMARY OF ARGUMENT

No. 1 WDFW definition of site 'dwelling' is lodging and not
'residential tenancy'.

No. 2 WDFW reasoned administrative code defines families who
dwelt in trailers other than mobile homes ineligible for relocation of
their specific usage within WAC 468-100-505. Quote WAC 468-100-
002(9):

(9) Dwelling: Means the place of permanent or customary and
usual residence of a person, as determined by the agency
according to local custom or law, including a single family
house; a single family unit in a two-family, multifamily, or
multipurpose property; a unit of a condominium or
cooperative housing project; a nonhousekeeping unit; a mobile
home; or any other fixed or installed residential unit other than
a unit customarily used, and currently (although not

necessarily immediately) capable of use, for transportation or recreational purposes.

Appellant and WDFW agree family met first portion of test;

“...*usual residence of a person.*” Parties differ with WDFW

interpreting test as global and Appellant interpreting test as a specific.

Appellant reasoned; 1. The Landlord Tenant Act reference by, ‘*custom or law*’ determines a families dwelling by a specific usaged RCW 59.18.030(1). 2. WAC 468-100-201 through 468-100-208 defines family’s eligibility by occupancy. 3. WDFW must consider impact on family’s safety, health and continue existence WAC 468-100-208(8) (a)(b)&(c).

Appellant and WDFW agree ‘*including*’ identifies a nonexclusive list of dwelling structures. Parties differ with Appellant arguing the list ascertains specific 1. a person’s usaged was residential-primary and 2. displacing agency necessary relocation of family’s dwelling usage by recognized building and occupancy codes--not as recreational.

No. 3 Commuting distance to work and services are defined by legislative statutes and administrative codes. When commuting costs are increase and exceeds an allotment of family income or exceeds

family's income altogether, comparable site 'dwellings' are not within family financial means.

ARGUMENT

Enter this maze of the family's dwelling being defined by Agencies as transient, then indigent, then recreational, then site 'dwelling'.... Through this labyrinth of uncongealed changing interpretations the *characterization of possession* by, license, recreational, transient, lodging, mobile home park, mobile home, local zoning, and usage residential tenancy as questioned was not understood. (Family's two page letter to WDFW April 3, 2001, identifying 16 relocation concerns and requesting access to agency relocation guidelines in Administrative Record pg -0215 and again at pg -0549) (Burt Loomis testimony at hearing as found in the Administrative Record Page - 00337 and also noted as page 70 at line 8 quote; "*And they were all month-to-month, not permanent residence.*") (See Appellant's Memorandum at Superior Court Issue no. 1 What are we?)

Agencies are to recognize and identify relocation problems and develop clarifications WAC 468-100-205 before displacement.

004. (See Appellant's Memorandum at Superior Court Issue no. 2
Due and reasonable care?)

1.. Review case law of lodging, license and tenancy. Quote;

[6] A determination of whether persons who inhabit a dwelling are lodgers or tenants is a matter of legal definition and, as such, subject to review on appeal as a conclusion of law. *Mercer Island v.*

Steinman 1973 9 Wn.App. 479, 513 P.2d 80.

[7] The factors indicative of tenancy are: (1) the exclusive possession of the rooms by the occupiers without a right of control or entry on the owner during the occupancy, (2) the separateness of each living unit from the remaining areas of the structure, (3) the existence of private outside entryways for each living space with keys possessed privately by the occupiers, (4) the absence of commonly shared cooking, eating and bathing facilities or other areas, (5) the arrangement of rental on a landlord-tenant basis, and (6) the absence of the performance of cooking, cleaning, garbage removal and telephone services for the occupiers by the owner. *Mercer Island v.*

Steinman 1973 9 Wn.App. 479, 513 P.2d 80.

[] The chief distinction between a tenant and a lodger lies in the character of possession. A "tenant" has exclusive legal possession of premises and is responsible for their care and condition. A "lodger" has only the right to use the premise, subject to the landlord's retention of control and right to access to them.... *Mercer Island v. Steinman* 1973 9 Wn.App. 479, 513 P.2d 80. Quote at pg. 485 from *Stowe v. Fritzie Hotels, Inc*, 44 Cal. 2d 416 421, 282 P.2d890(1955).

[] No Washington decision defining "lodger" has been discovered, but other courts have found the following factors persuasive that persons are lodgers and not tenants: they share food service, they share bathroom facilities, the operator of the building had free access to their rooms, the operator provided maid service and linens, and the room was furnished... *Lacey Nursing v. Dep't of Revenue* 200 103 Wn.App. 169, 11P.3d. 839. Quote at pg. 184 from *Stoebuck, supra* 6.3 at 296-97.

[13] A tenancy grants the right to have exclusive possession and use of real property whereas a license to use real property merely grants the use of another's land. *Lacey Nursing v. Dep't of Revenue* 200 103 Wn.App. 169, 11P.3d. 839

WDFW defines site 'dwelling' by Latches and Public bathroom.
This is not residential tenancy of real property. The family is by
WDFW characterization indigent --homeless or 'dwellingless'.

2. **Properly** interpret dwelling within WAC 468-100-002(9) by
review of case law;

A. Legislatures did not define dwelling and related terms within
RCW 8.26. The chapter reference eligibility by primary residence,
tenancy and dwelling. Legislature expects WDFW to limit its
interpretation and authority to established legislated recognized usage
of these terms as found within the Landlord Tenant Act and Mobile
Home Act. Quote;

[3] The powers of an administrative agency are limited to those
granted by statute. [2] The primary object of statutory
construction is to ascertain the intent of the Legislature. Such
intent is determined primarily from the statutory language. [7] A
court does not defer to an administrative agency's determination
of the scope of its own authority. *In Re Electric Lightwave, Inc.*
123 Wn.2d 530, 869 P.2d 1045.

[2] An administrative agency is strictly limited in its operations to
those powers granted by the legislature. [5] An administrative

those powers granted by the legislature. [5] An administrative agency cannot amend its statutory framework under the guise of interpretation. *Cole v. WN. Util. & Transp. Comm'n* 79 Wn.2d 302, 485 P.2d 71.

[10] Court construes a statute to carry out the Legislatures intent.

[11] An appellate court has a duty to provide consistency and predictability to the law so that persons may conform their behavior accordingly. *Salts v. Estes* 133 Wn.2d 160, 943 P.2d 275.

RCW 8.26 was created; "To establish a uniform policy for the fair and equitable treatment of persons displaced...and to minimize hardship of displacement on such persons;"

The WDFW has not established Legislature authority to select families who's occupancy is eligible to be relocate and whose occupancy is not eligible to be relocate.

B. Agency's interpretation of WAC 468-100-002(9) defines classes of residential tenancies who are not eligible for relocation.

Quote;

immunities which upon the same terms shall not equally belong to all citizens, or corporations. *Constitution Article I Declaration of Rights Section 12 Special Privileges and Immunities Prohibited.*

Aliens within WAC 468-100-208 (8) (a) (b) & (c) are relocated based on adverse impact and continue existence of family unit. Appellant family has a special child. (Family's two page letter to WDFW April 3, 2001, identifying 16 relocation concerns and requesting agency relocation blueprint the document is in the Administrative Record pg -0215 and again at pg -0549)

[2] Any classification based on alienate is inherently suspect and will be subject to close judicial scrutiny in order to insure that persons similarly situated with respect to the legitimate purposes of the law receive similar treatment *Herriott v. Seattle 81 Wn. 2d 48, 500 P.2d 101.*

Equal protection is given to a family unit as a fundamental right.

[7] Parents have a fundamental right to maintain a relationship with their children. *State v Singler 85 Wn. App. 329, 932 P.2d 710.*

WDFW defined families ineligible by character of the dwelling.

[12] A statute satisfies the rational basis (or minimal scrutiny) test for analyzing an equal protection challenge if (1) it applies to all member within the designated class, (2) there are reasonable grounds to distinguish between class and nonclass members, and (3) the classification is rationally related to the purpose of the legislation. *State v Singler 85 Wn. App. 329, 932 P.2d 710.*

[2] ...Although the equal protection guaranty does not require that all persons necessarily be dealt with identically, it does require that a distinction made by statute have some relevance to the purpose for which the distinction is made. [4] Under the rational basis (or minimal Scrutiny) test for analyzing equal protection challenges to legislative classification, when a statute creates more than one class of persons, the members of one class may not be treated differently from the members of the other classes if the legislative distinction between classes is arbitrary (i.e. the defining characteristics of the respective class are not rationally related to the achievement of the statutory objective). *Detention of Dydasco 135 Wn.2d 943, 959 P.2d 1111.*

WDFW has not distinguished a reasonable ground for classification of indigent dwellers. There is no rational basis for state to define a class of families by a character of property dwellingless and cause to abandon child. WDFW interpretation of WAC 468-100-002(9) is unrealistic and arbitrary.

C. Statutory and Administrative Code provisions are harmonized. Quote;

[3] A more specific statute prevails over a more general statute only if the two statutes deal with the same subject matter and, in light of all the language used in relation to other relevant provisions, they conflict to such an extent that they cannot be harmonized. *Omega Nat'l Ins. Co. v. Marquardt* 115 Wn.2d.416, 779 P.2d 235.

[3] Two statutes which relate to the same subject should be harmonized to the extent possible so that the legislative intent behind both statute is achieved. *Dep't of Transportation v. SIEB* 97 Wn. 2d 454, 645 P.2d 1076.

[7] An undefined statutory term is presumed to have its common law meaning, and the Legislature is presumed to know the prior

judicial use of the term. *Dep't of Transportation v. SIEB* 97 Wn.

2d 454, 645 P.2d 1076.

[2] The rule of statutory construction that the express inclusion of one item manifest an intent to exclude other items not mentioned applies only when the intent of the legislature is doubtful. The rule will not be used to defeat apparent legislative intent. *State v. Williams* 94 Wn.2d 531, 617 P.2d 1012.

[6] Statutes relating to the same subject are read together in light of the specific issues which the Legislature intended each statute to address. *State v. O'Neill* 103 Wn.2d 853, 700 P.2d 771

[1] Statutes relating to the same subject must be read together to determine the Legislature's purpose in enacting each of them and with the aim of harmonizing their provisions. *Empolyco Personnel Serv. v. Seattle* 117 Wn.2d 606, 871 P.2d 1062.

WDFW did not harmonize the different statutes and related codes provisions. See Summary of Argument at page 8.

D. The term Mobile Home is not defined within WAC 468-100-501. Section was developed after mobile homes, as a product, ceased to be built and new law. The global definition of Mobile Home;

“... not solely as a vehicle or solely as a building, but as a combination of both--- not only with the laws of the road but also within those applicable to reality and fixtures.” *U.S.A. v. 19.7 Acres of Land 103 Wn.2d 296, 692 P.2d 809. 299 Referenced to Mobile Homes and Mobile Home Parks Sec 1.5 {Davis ed. 1975.}*

Defining Mobile Home by RCW 46.04.302 means structures built before 1976 within WAC 468-100- 501 would un-classify the relocation of modular buildings, manufacture homes, park models and other residential units in Subpart F Mobile Homes WAC 468-100-501.

[4] A statute should not be interpreted so as to not produce a strained, unlikely, or unrealistic interpretation. *Lacey Nursing v. Dep't of Revenue 103 Wn. App. 169, 11 P.3d 839.*

[1] In the absence of statutory definition, the words of a statute must be understood in their usual and ordinary sense, read in

Dep't of Revenue 103 Wn. App. 169, 11 P.3d 839.

[1] In the absence of statutory definition, the words of a statute must be understood in their usual and ordinary sense, read in context and a whole, each part being given effect with every other part, so that the spirit and purpose of the legislation prevails.

Cramer v. Van Parys 7 Wn. App. 584, 500 P.2d 1255.

[3] The sense in which a term is used in a statute may be determined by considering the statute's object or purpose. *Salts v. Estes 133 Wn.2d. 160, 943 P.2d 275.*

[2] The rule of statutory construction that the express inclusion of one item manifest an intent to exclude other items not mentioned applies only when the intent of the legislature is doubtful. The rule will not be used to defeat apparent legislative intent. *State v. Williams 94 Wn.2d 531, 617 P.2d 1012.*

Genuine interpretation of WAC 468-100-002(9) will harmonize with WAC 468-100-501. WDFW interpretation of an in-eligible class, indigents, families who dwelt in trailers, is strained unlikely and unrealistic.

Trailer was immobilized by insurance fixed to site as a mobile home (Final Order in Administrative Record at pg. 0011 Findings of Fact #2.) and family did not have a vehicle with proper receptacle.

Quote;

“The fact that there was no motorized vehicle there with the proper receptacle attached made the trailer not readily mobile. Accordingly, the immobile trailer is more akin to a dwelling for search and seizure analysis...” *State v. Kypreos 110 Wn. App. 612, 39 P.3d 371. Analysis at 627 last paragraph of [10-11].*

3. Commuting distance must be comparable and reasonable defined in RCW 8.26 020(7)(c)&(f) and WAC 468-100-002(5)(d)&(g). Quote cases;

[1] A court will not amend the plain language of a statute in the guise of construing it. [2] The clear language of a statute does not require a judicial construction and enforced as written. [10] Court construes a statute to carry out the

does not require a judicial construction and enforced as written. [10] Court construes a statute to carry out the Legislature's intent. *Salts v. Estes Wn.2d 160, 943 P.2d 275 (1997)*.

[4] Regardless of the commendability of an enactment, the courts do not weigh the economic impact of legislation when determining its constitutionality. *Port of Longview v. Taxpayers 85 Wn.2d 216, 533 P.2d 128 (1974)*.

[5] Financial hardship cannot be an excuse for failing to perform a duty undertaken for economic benefit. *Cramer v. Van Parys Wn.App. 584, 500 P.2d 1255 (1972)*.

WDFW has not identified a site 'dwelling' or whatever phrase one uses to identifying a 'dwelling' that is commutable . (See Appellant's Memorandum at Superior Court Issue no. 3 Commuting distances begins at page 36 of document) (Final Order in Administrative Record at pg. 0018 Conclusions of Law #17.)

The agency's cost to relocate family does not excuse creating a financial hardship on the family unit RCW 8.26.115.

V. CONCLUSION

WDFW reasoned and applied the administrative codes outside of legislated authority and constitutional equal protection. Displaced family is eligible for relocation of historical family's dwelling usage. The family's eligibility is define in Mobile Home portion of WAC 468-100-505. The character of possession by; lodging, license, zoning, tenancy of real property and landlord-contract is a valid concern and must be addressed. WDFW must relocate family within commuting distances that will not adversely impact the family existence with special child.

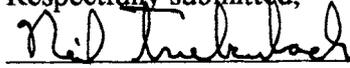
RELIEF SOUGHT; (See Petition for Judicial Review)

1. Payment of moving costs from property as displaced dwelling.
2. Payment for one-hundred eighty day occupant of a displaced dwelling \$22,500.00 toward purchase of replacement dwelling WAC 468-100-505.
3. WDFW did not identify a replacement dwelling. Last Resort Housing applies WAC 468-100-601. Request payment

of housing costs down to 30% of income as one hundred
eighty-day occupant tenant WAC 468-100-002(4)(g)(iii).

May 19, 2007

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Neil Triebenbach", written over a horizontal line.

Neil Triebenbach

VI. APPENDIX

RCW 8.26.

WAC 468-100

Court Rules

RCW 59.18.030(1)

RCW 59.20.030(10)

RCW 34.05.570(3)

RCW 46.04.302

Sites as listed alphabetically in Table of Authorities.

COURT OF APPEALS
07 MAY 21 2007
STATE OF WASHINGTON
BY YN

COURT OF APPEALS, DIVISION II
OF THE STATE OF WASHINGTON

10 Neil Triebenbach, NO.03-2-00581-1
11 Appellant, NO. 35956-1-II
12 vs. CERTIFICATE OF SERVICE
13 State of Washington of
14 Fish and Wildlife, WDFW,
15 Defendant.

17 PROOF OF SERVICE:

18 I certify that I served a copy of the following document; Brief with
19 Appendix as identified.

21 On the below-listed party and court:

22 Matthew R. Kernutt, WSBA #35702
23 Assistant Attorney General of Washington
24 1125 Washington Street SE
25 PO Box 40100
Olympia, WA 98504-0100
(360) 664-2962

CLERK, COURT OF APPEALS
ATTN: LISSA
950 BROADWAY SUITE 300
TACOMA WA
98402-4054

26 On this 19 day of MAY, 2007, by the method stated below:

27 US Mail Postage Prepaid with delivery confirmation to party.

29 I certify under penalty of perjury under the law of the State of
Washington the foregoing is true and correct.

30 Dated the 19 day of MAY, 2007, at Sequim Washington.
Carlsberg

31 Neil Triebenbach
32 Neil Triebenbach
33