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IN THE SUPREME COURT OF THE
STATE OF WASHINGTON

No. 98320-8

GARFIELD COUNTY TRANSPORTATION AUTHORITY; et al.
Appellants/Plaintiffs,

WASHINGTON ADAPT; TRANSIT RIDERS UNION; and
CLIMATE SOLUTIONS,

Appellants/Intervenor-Plaintiffs,

v.

STATE OF WASHINGTON,

Respondent/Defendant,

CLINT DIDIER; PERMANENT OFFENSE; TIMOTHY D. EYMAN;
MICHAEL FAGAN; JACK FAGAN; and PIERCE COUNTY,

Respondents/Intervenor-Defendants.

AMICUS CURIAE BRIEF OF SAN JUAN COUNTY

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I. INTRODUCTION

Like the Plaintiffs in this case, San Juan County with its inhabitants is greatly affected by the constitutional violations within Initiative 976 (“I-976”) and in particular the violation of Article II, Section 19 (single subject rule) and Article II, Section 37 (prohibiting summary amendments). Unlike the Plaintiffs, this brief of San Juan County offers the perspective of a small county with rural roots and a virtually sole reliance on public surface transit via the Washington State Ferries to access the rest of the state.

II. IDENTITY AND INTEREST OF AMICUS CURIAE

San Juan County is a home rule, charter county, located in the northwest corner of Washington State located between the mainland of Washington and Vancouver Island, British Columbia. It is Washington State’s most marine county, consisting of 172 named islands with a land mass of approximately 179 square miles. It has a population of about 17,000 people, which swells to about three times that size in the peak summer tourist season. Over six million people live within one day’s drive of the San Juan Islands. A significant part of the San Juan County economy relies upon accommodation, retail, and services activities which rely upon people who travel from the “mainland” USA.

San Juan County is not connected to the mainland by any road or highway. Transportation to, from, and within the county is solely by Washington State Ferries, other mostly seasonal watercraft, and light aircraft. Washington State-operated ferries serve the four most populous islands: San Juan, Orcas, Lopez, and Shaw. Most residents and their families and guests use the Washington State ferry system regularly. For the year 2019, statistics from the Washington State Ferries shows the following number of riders on the San Juan County ferry routes:

Anacortes -Friday Harbor	896,384
Anacortes – Orcas Island	677,400
Anacortes – Lopez Island	317,329
Interisland	103,381
Total	1,994,494

San Juan County residents are aware of and affected by the operations, service, and capital needs of the ferry system as well as the financing of this economic and safety lifeline. The Washington State Ferries and the San Juan County Council jointly rely upon a Ferry Advisory Committee to follow closely the developments in routes, schedules, fares, allocations, service and any other matter affecting the ferries. This information is then widely shared at public meetings held throughout the

islands by the leadership at the Washington State Ferries and the County Council. *See generally*, RCW 47.60.310.

According to a Guest Column in the local paper, The Journal of the San Juan Islands, the San Juan County Ferry Advisory Committee shared that the total impact to the Washington State Ferries had not been predicted before the vote on I-976. (See Exhibit A). But it acknowledged that nine percent (9%) of the funding or \$45 million was at risk for the biennium July 2019-June 2021 because that funding is based upon a share of the multimodal account threatened by I-1976.

This background helps explain why voters in San Juan County voted so decisively against I-976. The people of San Juan County voted 5,491 (70.48%) against the measure and 2,300 (29.52%) for the measure. This undoubtedly reflects the fact that voters understood that I-976 was going to have lasting effects on public transportation and the Washington State Ferries notwithstanding the fact that the ferry system is not mentioned in either the ballot title or in the body of the initiative.

State funding for public transportation is an integrated combination of fees, charges and taxes that are part of a complex arrangement established by the Washington Legislature. These fees often pay for improvements to highways and roads as well as public transportation. The routes of the Washington State ferries are defined as state highways. RCW 47.17.081

(designating ferry routes from Anacortes, WA to Lopez Island, Orcas Island, Shaw Island and Friday Harbor as State Highway 20 North). Their unique status in the transportation network requires that the ferries be recognized in the ballot title.

III. STATEMENT OF THE CASE

Amicus San Juan County adopts the Statement of Case set forth in the Appellants' Opening Brief filed with this Court on April 24, 2020.

IV. ARGUMENT

A. The I-976 Ballot Title Violates Article II, Section 19 By Failing to Disclose the Severe Impacts the Measure Will Have on the Washington State Ferry System.

Article II, Section 19 requires that the subject of an act or initiative be expressed in its title. The title for this purpose is the ballot title, the purpose of which is to inform the public and the voters of the contents of the measure. *Amalgamated Transit Union Local 587 v. State*, 142 Wn.2d 183, 217, 11 P.3d 762 (2001). The use of the ballot title carries special importance even though greater detail may be provided in the explanatory statement, because voters may cast their votes based upon the ballot title alone. *Id.*

The Initiative's title refers to one section of the initiative with the slogan: "Bring Back Our \$30 Car Tabs" but then says it is "relating to limiting state and local taxes, fees and other charges related to vehicle."

Section 1 does not identify the purpose or use of any charge or fee assessed during the acquisition, licensing or ownership of vehicle, but rather only mentions the charge itself. This defect was carried forward in the ballot title and in so doing created the error that is constitutionally defective. A ballot title must include the subject or object that is accomplished by the measure and that was not done; only one effect of the law is mentioned – reduced fees and charges. This Initiative’s title temptingly invited the voters of this state to shoot themselves in the foot. The informed voters of San Juan County were not fooled, but others were.

Every measure’s official ballot title consists of two parts: a one-sentence statement of the subject and a word-limited concise statement of the measure. The ballot title of I-976 is a concise statement, it is just 34 words, and together with the statement of subject reads as follows:

Initiative measure No. 976 concerns motor vehicle taxes and fees. This measure would repeal, reduce or remove authority to impose certain vehicle taxes and fees, limit annual motor-vehicle license fees to \$30, except voter-approved charges; and bases vehicle taxes on Kelley Blue Book value.

The Initiative itself contains one section on policies and purposes, twelve sections with substantive content, and four sections that are ministerial in nature. The focus here is on the twelve sections with the substance of the measure.

As seen above, the word “ferry” or “ferries” are not mentioned in the initiative title. Nor is the “multimodal account” or funding for transportation benefit districts. While the measure did address the amount of the car tabs, the true scope of the initiative which was to address funding for *all aspects* of the highway or transportation system including the operation of ferries and multimodal transportation (i.e. buses, light rail, high occupancy vehicle travel lanes, bicycle paths). The measure has dramatic implications on funding for every part of the transportation system, including charges previously approved by voters at the local level at valid elections authorized by statutes neither amended by nor mentioned in the Initiative.

It has been said many times that “the title of an act need not be an index to the contents of the legislation that follows, nor need it express in detail every phase of the subject which is dealt with by the enactment, but that it is sufficient if the title gives such notice as should reasonably lead to an inquiry into the body of the act itself, or indicates, to an inquiring mind, the scope and purpose of the law.” *State ex rel. Washington Toll Bridge Auth. v. Yelle*, 32 Wn.2d 13, 25–26, 200 P.2d 467 (1948) (citations omitted). But by omitting all reference to “ferry” or financing for ferries the title missed the mark to give sufficient notice of the objectives and implications of the initiative.

The general test of sufficiency is whether the title gives “sufficient notice of the object of the act.” *Treffry v. Taylor*, 67 Wn.2d 487, 408 P.2d 269 (1965). Here, the language offered is simply “motor vehicle taxes and fees.” This language is too narrow. The purpose, subject or object of those fees must also be mentioned, even if in general terms, and especially since the legislature has already specified and limited the purpose for which the fees or charges are going to be used.

With respect to the transportation system and particularly the provision for wharfs, ferries and ferry connections, the courts have been demanding. The mere reference to “ferry connections” in a title is insufficient to provide notice that a measure provides for the acquisition and operation of a ferry transportation system. *Yelle* at 474. This case is analogous to *Yelle*, but instead of being a measure that provides *for* the operation of a ferry system, the measure *viscerates* the funding for the ferry system and will lead to a decline of service, potential loss of safety and potential shifting of charges to others, all without notice that ferries are even affected.

Of particular concern to San Juan County are provisions that reduce the current revenue to the intermodal fund and the repeal of financing for a potential transportation benefit district and particularly the passenger ferry transportation benefit district authorized by RCW 36.57A.200. When

enacting that law the legislature recognized that local governments may step in and it “should provide an opportunity for locally sponsored service....” RCW 36.57A.200 – Findings and Intent. The funding mentioned in RCW 36.57A.200 includes RCW 82.80.130, which is repealed by I-976.

A simple reference to the “repeal of certain vehicle taxes and charges” would give no notice that the purpose of those taxes and charges were *excise taxes* used to pay for ferry construction, operation or maintenance. The informed reader of the ballot title, the initiative itself and all promotional advertisement would believe that the initiative deals with car tabs, and other fees incidental to registration, not excise taxes.

Section 6, subsection 3, refers to RCW 82.80.130 the local option motor vehicle excise tax to be used for local passenger ferry service. But RCW 82.80.130 in turn is adopted by reference into other statutes, none of which are mentioned in the Initiative or the ballot title. See RCW 36.57A.200, RCW 36.57A.210 and RCW 36.57A.220. By repealing RCW 82.80.130, the Initiative I-976 also eviscerates those other laws, all without any mention of this subject in the title, or in the Initiative. No amount of reasonable inquiry by a voter would cause a person to understand the sweeping impact of this measure or related statutes not identified. In this way, the title fails the test that the subject of an act can be reasonably gathered by reading the title. In addition to the mention of taxes and fees it

must also state the purpose to which those fees are applied to be a complete statement of the subject. This title does not even meet the liberal evaluation of titles allowed by

Fritz v. Gorton, 83 Wn.2d 275, 290-91, 517 P.2d 911 (1974) where the words “openness in government” did not appear within the 100–word ballot title, but was determined there was enough so that voters would know that purpose.

B. The Ballot Title Violates Article II, Section 19 by Combining Multiple Subjects in One Measure.

The Initiative itself is contrary to Article II, Section 19 because it combines multiple subjects into one initiative and provides a classic example of “log-rolling” as discussed in the Opening Brief of Appellants filed April 24, 2020 at page 15 and elsewhere. Appellants’ counsel have stated well the laws against log-rolling legislation and the purpose behind the single subject rule. Recognizing that state-wide initiatives take a big effort to gather signatures and promote the measure, there is a natural desire of a sponsor to include as many provisions in one initiative. But when the initiative takes on the topic of charges, fees, taxes, assessments, the court must *look beyond the fee or charge* as a subject *and examine the purpose of the fee* and how it is applied to see if the multiple subject rule is violated.

San Juan County asks the Court to use the approach discussed in *Washington Toll Bridge Auth. v. State*, 49 Wn.2d 520, 523–24, 304 P.2d 676 (1956) where this Court held that the multiple subject rule was violated by legislation that addressed authority to establish and operate toll roads and to construct one such toll road linking Tacoma, Seattle and Everett. The case is useful because it shows that although the object of the law involved topics which covered the same general subject (toll roads) multiple subjects were identified based upon the operations of the statute (i.e. temporary or permanent duration of powers or authority for each toll road). In that case, the temporary nature of authority to construct one segment of the toll road was identified as a subject separate from the general authority to construct toll roads. *Id.* at 524.

In this case, there are multiple charges, fees, taxes and assessment methods affecting a wide range of transportation elements: roads, bridges, ferries, ferry terminals, buses, trains, etc. These are multiple subjects. The Court should not accept that the general subject is one of motor vehicle fees and taxes because that subject is so expansive that it could affect a wide range of activities involved in transportation and such a wide rule would undermine the purpose of the single subject rule. *See, e.g. Kunath v. City of Seattle*, 10 Wn. App.2d 205, 444 P.3d 1235, (2019), as amended on denial of reconsideration (Aug. 7, 2019).

There is no rational reason that the funding for passenger ferries by local government is germane to funding for busses or trains, roads, bridges and bicycle paths. Equally compelling as a *separate subject* is the requirement that Sound Transit repay outstanding bonds and debt, as discussed in Appellant's Brief pages 23-28. San Juan County, like other government agencies, asks this Court to prohibit the log-rolling of the mandatory bond defeasement and indebtedness provisions under the guise of \$30 car tabs. Indeed, if that is allowed here, there is no end for how multiple subjects could be hidden in statewide initiatives on financing measures. Based upon the foregoing the court should invalidate I-976 as contrary to Article II, Section 19.

C. Legislatively Delegated Taxing Authority for Local Purposes Cannot Be Taken Away without a Replacement Offered.

The power to assess and collect local taxes for local purposes is central to our Republican form of government. It is provided for in Article XI, Section 12 of the Washington Constitution which states:

The legislature shall have no power to impose taxes upon counties, cities, towns or other municipal corporations, or upon the inhabitants or property thereof, for county, city, town, or other municipal purposes, but may, by general laws, vest in the corporate authorities thereof, the power to assess and collect taxes for such purposes.

If the legislature authorizes activities or imposes duties on local government without providing for a funding source, the local government

would cease to exist. This principle was recognized by this Court in *State v. Burr*, 65 Wash. 524, 527–28, 118 P. 639 (1911) where the Court said:

‘Of all the customary local powers, that of taxation is most effective and most valuable. To give local government without this would be little better than a mockery. If any state has the power to withhold it, the exercise of such a power would justly be regarded as tyranny. Indeed, local taxation is so inseparable an incident to republican institutions that to abolish it would be nothing short of a revolution.’

Id. (citing *Cooley on Taxation* (3d Ed.) p. 1294).

The Initiative I-976 runs afoul of Article XI, Section 12 when it forecloses fees on present and future voter approved charges to fund local transportation projects. This is particularly distressing to San Juan County which may need to exercise its powers to operate a transportation benefit area for a local passenger only ferry that is funded by a motor vehicle excise tax. Like other jurisdictions and transportation benefit districts, I-976 has allowed voters outside of San Juan County to effectively limit San Juan County’s ability to fund local transportation projects even when they may be desired by the people affected by the fee: the residents of San Juan County.

D. Constitutional “Home Rule” establishes the Presumption of Autonomy in Local Governance.

There are now seven “home rule” charter counties in Washington State, of which San Juan County is one. Of the principles of home rule

government, one is to keep local control of government activities and taxation as close to the electorate as possible. *Watson v. City of Seattle*, 189 Wn.2d 149, 166, 401 P.3d 1 (2017).

I-976 interferes with the home rule principle of Article XI, Section 4 of the Washington Constitution by foreclosing the opportunity of these communities to deal with public and private transportation the way the local government believes is necessary. Instead, the initiative removes authority that has previously been granted to and exercised at the local level. The Home Rule principle allows the entire state to have a vote on the distinctly local matter of whether San Juan County has authority to impose a passenger-only ferry tax. Voters in the majority of the state will not be affected one way or the other by whether or not San Juan County has such authority. Likewise, those out of county voters would not be affected if San Juan County did have such a local tax. This is a purely local issue that does not affect voters statewide and should not be decided by voters statewide.

V. CONCLUSION

Funding for transportation is complicated, and not suitable for a broadly worded initiative on many different topics. It takes time to do it right, and it is something that must be done in several steps and not with a sweeping initiative like I-976. I-976 violates multiple constitutional provisions that ensure honesty and transparency in legislation and protect

the principles of the Home Rule.

For the foregoing reasons, as well as those provided in Appellant's Opening Brief, San Juan County asks the Court to reverse the trial court and declare I-976 unconstitutional.

Respectfully submitted this 5th day of June 2020.

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MICHAEL FAGAN; JACK FAGAN; and
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Respondents/Intervenor-Defendants.

Tamara Greene declares and states:

That I am now, and at all times hereinafter mentioned was, a
citizen of the United States and a resident of San Juan County, state of
Washington, over the age of 18 years, competent to be a witness in the

above-entitled proceeding and not a party thereto; that on June 5, 2020, I caused to be served, via the Washington State Appellate Court's Portal System, a true and correct copy of San Juan County's Motion for Leave to File *Amicus Curiae* Brief and San Juan County's *Amicus Curiae* Brief in the above-entitled cause to:

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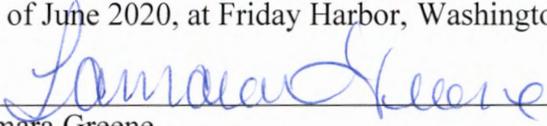
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I make the foregoing statement under penalty of perjury of the
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Dated this 5th day of June 2020, at Friday Harbor, Washington.



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