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FILED
COURT OF APPEALS DIV I
STATE OF WASHINGTON
2011 OCT 14 PM 2:35

No. 67236-3-I
King County Superior Court No. 10-2-31288-9 KNT
IN THE COURT OF APPEALS
OF THE STATE OF WASHINGTON
DIVISION I

SKAGIT D06, LLC, a Washington limited liability company,
Plaintiff/Appellant,

vs.

GROWTH MANAGEMENT HEARINGS BOARD, an agency of
the State of Washington; and CITY OF MOUNT VERNON, a
municipal corporation,
Defendants/Respondents.

APPELLANT'S BRIEF IN RESPONSE TO CROSS APPEAL

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ORIGINAL

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I. INTRODUCTION

The Growth Management Hearings Board (the “Board”) has jurisdiction to hear claims that “plans, development regulations or amendments” adopted pursuant to the Growth Management Act, RCW ch. 36.70A, are not in compliance with the requirements of that statute. RCW 36.70A.280. The City claims that the Board lacked jurisdiction to consider Skagit D06’s challenge to Ordinances 3472 and 3473 on the theory that the two ordinances were not “plans, development regulations or amendments” adopted pursuant to the Growth Management Act. While the Board’s decision on the merits was flawed, as Skagit D06 has addressed in its substantive briefing, the Board’s Order Denying City’s Motion to Dismiss for Lack of Jurisdiction (“Board’s Order on Motion”) was correct.¹

This is a case about two ordinances, Ordinances 3472 and 3473, which the City adopted expressly relying on its GMA-based authority and GMA-imposed duties and which the City adopted to implement its GMA-based Comprehensive Plan and development regulations. This Court is asked to review whether the City’s two new ordinances interfere with the City’s ability to meet urban density requirements and growth targets under

¹ *Certified Documentary Record* (“DR”), 000676-000683.

GMA and interfere with the City's duties as an urban services provider within the UGA. As such, this case was clearly subject to the Board's jurisdiction.

The City argues that the two challenged ordinances are not GMA-based and are not subject to GMA by claiming that the City's jurisdiction 'ends' at its City limits and that this somehow removes the ordinances from scrutiny under the GMA. This argument ignores two critical aspects of this case: (a) the City has a GMA-based duty to adopt policies and regulations that affirmatively foster and encourage urban growth in the **unincorporated** Urban Growth Area ("UGA"), and (b) the fact that the City is the sole utility provider to the unincorporated UGA, which gives the City the power to regulate and prevent otherwise permissible urban development outside its city limits.

The City also argues that its policies and regulations related to annexation and provision of utility service are topics beyond the Growth Board's jurisdiction. The City is fundamentally incorrect on these arguments, as the Growth Board correctly concluded in its Order on Motion. The City's amendments to its Comprehensive Plan and development regulations as set forth in Ordinances 3472 and 3473 do relate to annexation and utility service, but they were specifically adopted as part

of the City's GMA-based Comprehensive Plan and development regulations.

Skagit D06's petition to the Growth Board did not challenge the City's refusal to annex Skagit D06's property. Skagit D06's petition to the Growth Board did not claim that the City's refusal to provide sewer service to Skagit D06's property violated contract law.² Skagit D06's claims are not a collateral challenge to previously adopted Skagit County planning policies or Board decisions related to Skagit County's Comprehensive Plan or development regulations.

Skagit D06 respectfully requests this Court deny the City's argument asserting lack of jurisdiction.

II. RESPONSIVE STATEMENT OF THE CASE

Ordinances 3472 and 3473 interfere with the ability of the City (and indirectly, Skagit County) to comply with the Growth Management Act ("GMA") (RCW 36.70A.020 and RCW 36.70A.110) and the City's own policies and regulations contained in the City's Comprehensive Plan, the City's Sewer Plan and various development regulations all of which were adopted as part of the City's implementation of the GMA. Further,

² While Skagit D06 may have claims against the City based on contract law, those challenges would not be not subject to Board jurisdiction and would be pursued in a separate legal action.

Ordinances 3472 and 3473 violated the GMA's process and requirements related to a moratorium under RCW 36.70A.390.

Skagit D06 accepts the validity of the previously adopted Plans and development regulations. However, the fact that Skagit D06 did not appeal the original adoption of the City's Comprehensive Plan, the City's Sewer Plan or various County development regulations is immaterial: Skagit D06 is not challenging those plans and regulations. The point of Skagit D06's appeal is that Ordinances 3472 and 3473 are unlawful under the GMA and inconsistent with and interfere with the previously adopted plans and regulations.

The City's factual assertions related to its regulatory authority in the unincorporated UGA are incorrect and misleading in three important ways. First, the City and Skagit County have an existing interlocal agreement, adopted as a GMA ordinance by Skagit County, which provides that the County will apply City development standards in the UGA.³

Second, the Skagit County development regulations in the UGA that apply to properties like Skagit D06 require the property owner to obtain a written commitment from the City to provide sewer service before submitting a development application for urban development. This gives

³ DR 001704-001796 (see specifically, page DR 001778: which provides that development in the unincorporated, *i.e.* County, UGA adjacent to the City of Mount Vernon shall be consistent with the *City's* development standards).

the City what amounts to a de facto *veto* over any and all urban development in the unincorporated UGA.

Third, the City's own express language found in both Ordinances makes it clear that the City intended the challenged ordinances to adopt the ordinances using its GMA-based authority to regulate land use in the UGAs:

It is within the best interests of the City, and promotes the safety, health and general welfare of the public to control how and when urban growth occurs within the City and within unincorporated Urban Growth Areas.⁴

(Emphasis added)

It is clear, on the face of both challenged ordinances that the City of Mount Vernon adopted the ordinances to regulate land development in the UGAs. The City's assertions to the contrary should be rejected.

III. RESPONSIVE STATEMENT OF ISSUES

1. Are Ordinances 3472 and 3473 subject to Board jurisdiction?

IV. LEGAL ANALYSIS

A. **The Board Had Jurisdiction to Review the Merits of Skagit D06's Issues Regarding Ordinances 3472 and 3473 for Compliance with the GMA.**

The City improperly attempts to re-characterize this case as being about annexation and utility policies, proprietary City functions, or private

⁴ DR 000007-000015 (Ordinance 3472, Conclusion of Law 4); DR 000016-000025 (Ordinance 3473, Conclusion of Law 2).

contract law, rather than about the Growth Management Act. Skagit D06 did not ask the Board (or this Court) to review compliance with annexation statutes such as RCW chapter 35A.14 (Annexation by Code Cities), Boundary Review Board standards or regulations, private contract law, or any other non-GMA authority. Instead, Skagit D06 directly challenged Mount Vernon's amendments to its GMA Comprehensive Plan and development regulations, as adopted under Ordinances 3472 and 3473, because those failed to comply with specific GMA statutes and mandates.

This Board unquestionably had authority to consider compliance with GMA. RCW 36.70A.280.

There can be little argument that RCW 36.70A.280 vests the Board with jurisdiction to consider amendments to the land use element of a local jurisdiction's comprehensive plan as well as development regulations.⁵

- i. Ordinances 3472 and 3473 are, by their express terms, amendments to GMA plans and development regulations and were adopted based on GMA procedural requirements.*

The City expressly adopted Ordinances 3472 and 3473 in accordance with GMA procedural mandates. The ordinances specifically state that they are amendments to the City's GMA-required documents: the Comprehensive Plan and the City's development regulations. RCW 36.70A.040 (every county and city planning under the GMA must

⁵ DR00679, Board's Order on Motion.

adopt a Comprehensive Plan and development regulations and designate its Urban Growth Area). The Board has clear and express jurisdiction to review the City's amendments to its Comprehensive Plan and development regulations. RCW 36.70A.280 (1)(a).

The City does not dispute that Skagit D06's arguments address the City's failure to comply with specific provisions of the GMA. Instead, the City argues that, despite the issues raised by Skagit D06, Ordinances 3472 and 3473 are not GMA-based actions. The City's argument ignores its own adoption process and express statements in Ordinances 3472 and 3473 that clearly indicate both ordinances are adopted pursuant to and subject to the GMA.

The Growth Management Act allows local jurisdictions to amend their Comprehensive Plan and associated development regulations once a year. RCW 36.70A.130 (2)(a). Both Ordinances 3472 and 3473 were adopted as part of the City's GMA-based once-yearly review and amendment process. See, *e.g.*, the following "Whereas" clauses in Ordinance 3472 (Ordinance 3473 contains virtually the same 'Whereas' clauses):

Whereas, the Mount Vernon Comprehensive Plan has consistently been maintained in compliance with the Washington State Growth Management Act, as amended since its initial adoption in 1995; and

Whereas, the Washington State Growth Management Act (GMA) requires the City of Mount Vernon to take legislative action to **review and, if need, revise its Comprehensive Plan and development regulations** on a regular basis...; and

Whereas, hearings were conducted on November 17th and December 16th, 2009 ... concerning **proposed amendments to the Comprehensive Plan**; and

Whereas, the notice of adoption of the proposed amendments was duly transmitted in compliance with RCW 36.70A.106(1); and

Whereas, the City Council finds that **the attached revised Comprehensive Plan** reflects the best interests of the citizens of the City of Mount Vernon, and

Whereas it is the intent of the City Council that **the attached revised Comprehensive Plan** shall serve as the future guide for anticipating and influencing the orderly and coordinated development of land and building uses within the City of Mount Vernon.

(emphasis added).

There is even more evidence in the text of both Ordinances 3472 and 3473 that makes it indisputable that the City adopted both ordinances as GMA-based policies and development regulations. The first Finding of Fact in both Ordinances 3472 and 3473 states:

The City has followed SEPA requirements and those requirements for public participation under the Growth Management Act (GMA) ...

The Board appropriately noted: “Why, one might well ask, did the City follow GMA public participation requirements for an action that it now argues was not taken pursuant to the GMA?”⁶

Within Ordinance 3472 itself, there are numerous additional indicia that the City intended to and did adopt the ordinance pursuant to the GMA:

- Finding 2 refers to planning goal 12 under GMA as a basis for the ordinance.
- Finding 3 cites the GMA for the proposition that, in UGAs, cities are the appropriate providers of utility services, including sewer service, and that this is a reason for adopting the ordinance.
- Finding 5 cites Countywide Planning Policy 12.6⁷ and City Comprehensive Plan Planning Policy LU-29.1 regarding provision of utility service as a basis for the ordinance.
- Findings 6 and 7 cite City Comprehensive Plan Annexation Planning Policy LU-29 as a basis for the ordinance.
- Finding 8 cites the buildable land analysis contained in the City’s Comprehensive Plan as a basis for the ordinance.
- Finding 9 cites Comprehensive Plan Policy LU-29.1.4 as a basis for the ordinance.
- Conclusion of Law 1 indicates the ordinance is an amendment to the City Code to “ensure that the City’s development regulations are consistent with the City’s Comprehensive Plan.”
- Conclusion of Law 2 states that public participation requirements under GMA have been met.

⁶ *DR 000678*, Board’s Order on Motion.

⁷ Every County and its cities are required by the GMA to adopt Countywide Planning Policies as a framework for their GMA plans and development regulations. RCW 36.70A.210.

- Conclusion of Law 3 states that the proposed amendments are in compliance with GMA.

The language of Ordinance 3473 is an even more clear indication that the City adopted these policy and regulation amendments pursuant and subject to GMA. Section 4 of Ordinance 3473 states:

Exhibit A [the new annexation policies] attached hereto and incorporated herein in its entirety by this reference is hereby adopted and **the proposed changes shall be included in the Land Use Element of the Comprehensive Plan** of the City of Mount Vernon.

(Emphasis added).

The City used its GMA-based powers to adopt mandatory land use policies in its Comprehensive Plan, which the City then implemented through its development regulations as prerequisites for any property owner before urban development can occur anywhere in the unincorporated UGA. The City's claim that Ordinances 3472 and 3473 were not GMA-based documents is unsupported.

- ii. The Board decisions on which the City relies do not support the City's arguments.*

The Board had jurisdiction to review City policies and regulations which impose restrictions on the availability of sewer services in the UGA, particularly when those policies and regulations are contained in ordinances which the City specifically states are part of its effort to comply with its GMA obligations. *See e.g. Thurston County v. Cooper Point Association,*

148 Wn.2d 1, 57 P.3d 1156 (2002), (Supreme Court reviewed extension of sewer service reviewed for compliance with GMA); *Fallgatter v. City of Sultan*, CPSGMHB Case No. 06-3-0003, (FDO, 06-29-2006) (Board reviewed water and sewer planning provisions related to service to the urban growth area for consistency with GMA requirements, including RCW 36.70A.020, Goals (1) and (12)).

The Board's denial of the City's jurisdiction claim is consistent with other Board decisions which recognize that regulations restricting sewer service in UGAs are development regulations which affect GMA-based comprehensive plans. As such, they are subject to the requirements of GMA and are reviewable by the Board. *See e.g., Vashon-Maury v. King County*, CPSGMHB Case No. 95-3-0008, page 1250 (code publishing) (FDO, 10-23-1995) (sewer and water regulations and conditions of service are implementing development regulations of the comprehensive plan).

The City cites several Board decisions as support for its generalized statements of law. When considered in detail, the authorities on which the City relies actually support the Board's decision to reject the City's jurisdictional argument.

The City fails to recognize and admit that cities have flexibility on the manner in which they adopt regulations regarding some issues, including annexation and utility service. The Board has consistently found

that it has jurisdiction in these arenas when a city adopts annexation and utility regulations or policies as part of its Comprehensive Plan, development regulations or both, and has addressed the substantive merits of challenges to annexation policies and utility regulations. *Harader v. City of Napavine*, WWGMHB Case No. 04-2-0017c (FDO, 2-2-2005).

The City relies on *Harader* to its ultimate detriment.⁸ In fact, *Harader* is a good example of the Board's jurisdiction. In *Harader*, an industrial land developer filed a petition challenging a City of Napavine resolution which related to water and sewer service. Napavine had adopted the challenged resolution totally independently of the GMA, both in terms of process and substance. The Board explained that the question that would resolve the issue of Board jurisdiction was "**whether the resolution was either a comprehensive plan amendment or a development regulations (or amendment to a development regulation).**" *Harader*, page 7 of 10 (emphasis added). In *Harader*, the Board determined that the Napavine resolution was not adopted as a Comprehensive Plan amendment and was not adopted as a GMA-based development regulation. As a result, the Board ruled that since the resolution was not adopted pursuant to or in furtherance of GMA-based planning, it had no jurisdiction. *Harader*, page 8 of 10.

⁸ *City's Response and Cross Appeal Brief*, page 45.

The manner in which Napavine conducted its planning under the GMA in *Harader* is totally distinct from the instant case. In this case, the City *expressly* adopted annexation policies and urban sewer service provisions as part of and to implement its GMA Comprehensive Plan and development regulations. Because Ordinances 3472 and 3473 were adopted as part of the Comprehensive Plan and development regulations, the Board clearly has jurisdiction to review their compliance with the GMA. The City's adoption of these amendments as GMA-based actions is consistent with the practice in many jurisdictions, which adopt utility and annexation policies and regulations as GMA actions because they are intended to implement various GMA plans and policies. See *e.g.*, *Vashon-Maury*, CPSGMHB Case No. 95-3-0008 (FDO, 10-23-1995).

The City also improperly relies on and fails to recognize the pre-GMA context of *Happy Valley et al. v. King County*, CPSGMHB Case No. 93-3-0008, (Order Granting Motion to Dismiss and Denying Motion to Amend, 10-25-1993).⁹ The Board, in *Happy Valley*, found that it did not have jurisdiction over the challenged plan amendments because they were pre-GMA documents. In *Happy Valley*, King County had not yet adopted a GMA Comprehensive Plan. The Board did not have jurisdiction to review amendments to the County's pre-GMA comprehensive and subarea plans,

⁹ See *City's Response and Cross Appeal Brief*, page 45, footnote 176.

which were the only ordinances challenged in that case. In contrast, the City of Mount Vernon's Ordinances 3472 and 3473 amend the City's GMA-based Comprehensive Plan and development regulations. As a result, *Happy Valley* is irrelevant.

The legal authority on which the City relies not support the City's argument that the Growth Board lacked jurisdiction.

B. The City Improperly Attempts to Eschew its Responsibilities to the Unincorporated UGA As a Result of its Role as the Exclusive Provider of Urban Services.

i. The City's role as sewer provider does not divest the Board of jurisdiction.

In making arguments regarding the Board's authority, the City improperly attempts to claim its role regarding sewer service in the UGAs is a purely proprietary function over which the Board lacks jurisdiction.¹⁰ By its own admission, the City is trying to control urban growth in the unincorporated UGA. The City's argument that it was acting in a purely proprietary capacity upon adopting Ordinances 3472 and 3473 is squarely defeated by the City's own statements in the Ordinances.

It is within the best interests of the City, and promotes the safety, health and general welfare of the public to control how and when urban growth occurs within the City and within unincorporated Urban Growth Areas.

¹⁰ *City's Response and Cross Appeal Brief*, page 43.

(emphasis added); *Ordinance 3472, Section 2(B) and Ordinance 3473, Section 2(4)*.

It is a long standing tenet that the GMA “**imposes an affirmative duty upon cities to ‘give support to,’ ‘foster’ and ‘stimulate’ urban growth throughout the jurisdictions’ UGAs within the twenty-year life of their comprehensive plans.**” *Benaroya, et al. v. City of Redmond*, CPSGMHB Case No. 95-3-0072c, page 2316 (code publishing) (Finding of Compliance, 3-24-1997) (emphasis in original). The *Benaroya* decision’s use of “the jurisdictions’ UGA” refers to every city’s duty to promote urban growth in both the incorporated areas and in the unincorporated UGA.

The GMA “is clear in providing that urban governmental services are to be available and provided in urban areas. Cities are the primary providers of urban governmental services.” *Hensley v. City of Woodinville*, CPSGMHB Case No. 96-3-0031, page 2304 (code publishing) (FDO, 2-25-1997). Pursuant thereto, a city’s comprehensive plan must contain a “capital facilities element that ensures that, over the twenty-year life of the plan, needed public facilities and services will be available and provided throughout the jurisdiction’s UGA.” *Id.* (emphasis in original removed).

The City argues without authority that its position that it has no duty to supply sewer service and that this assertion should apparently divest the Board of jurisdiction. First, this argument is substantive, not related to the

Board's jurisdiction: Ordinances 3472 and 3473 are GMA-based ordinances and Skagit D06's argument is that they do not comply with GMA mandates.

Second, as Skagit D06 explained in its Opening Brief and the City cannot refute, the general rule that cities are not required to provide utility service outside their city limits does not apply (1) where a city is the sole source provider of a utility service, such as water or sewer, in an area outside its city limits, **or** (2) where a city has held itself out as willing to supply such utility service to such area. In those cases, a city has a public duty to provide utility service outside its city limits. *Yakima County Fire Protection District 12 v. City of Yakima*, 122 Wn.2d 371, 858 P.2d 245 (1993); *see also Brookens v. Yakima*, 15 Wn. App. 464, 550 P.2d 30 (1976).

As the exclusive provider of sewer and water service, the City must supply all those in the UGA who request such service.

Nolte v. City of Olympia, 96 Wn. App. 944, 982 P.2d 659 (1999).

The City's simplistic assertion that it is acting in a proprietary capacity and therefore apparently should be allowed to condition sewer service as it subjectively wishes is not defensible.¹¹ This Court of Appeals, Division 1, has directly ruled that a city cannot place unlawful or even unreasonable conditions on sewer service. *MT Development v. City of Renton*, 140 Wn. App. 422, 428, 165 P.3d 427 (2007). A City cannot use

¹¹ *City's Response and Cross Appeal Brief*, page 42-43.

its role as sewer provider to impose its zoning regulations on property in the unincorporated UGA as a condition of service. *MT Development*, 140 Wn. App at 429. The City's zoning authority ends at its borders. *Id.* Under *MT Development*, the City's ordinance would have reduced allowed density in unincorporated area to less than 8 dwelling units, a density allowed under County zoning if sewer service was provided. *Id.* at 424. In comparison, Skagit D06 and other property owners could develop their properties at a density of four dwelling units per acre based on sewer service prior to Ordinances 3472 and 3473. However, as a result of Ordinances 3472 and 3473, the properties now can only develop at a density of 1 dwelling unit per five acres.

Ordinances 3472 and 3473 do exactly what *MT Development* prohibits: they superimpose the City's police powers of zoning onto unincorporated UGA property by virtue of the City being the sewer provider. *MT Development* stands as authority to firmly reject the City's proposition that any proprietary role as sewer provider allows the City to subjectively condition service as it desires and ignore state laws such as the GMA.

The City's argument that Ordinances 3472 and 3473 are purely proprietary fails. The Board had clear jurisdiction to review the City's policies and regulations related to Mount Vernon's extension (or, in this

case, refusal to allow extension) of sewer service into its unincorporated UGA to determine whether, as alleged by Skagit D06, the ordinances unduly interfere with GMA policies regarding prevention of sprawl, provision of adequate urban services, including sewers, in UGAs and encouragement of urban growth in UGAs and so forth.

ii. *The City's erroneously argues it can lawfully condition sewer service upon annexation.*

Finally, the City erroneously asserts that it can lawfully condition sewer service on actual annexation before provision of service.¹² Therefore, the City concludes, GMA does not govern the case.¹³ The City's reliance on *Yakima County Fire District* for this proposition is fundamentally misplaced.

In *Yakima County Fire District*, the Court found that that the City of Yakima did have a duty to provide sewer service but that Yakima could condition that service on agreement that the landowner sign a petition for annexation. *Yakima County Fire District*, 122 Wn.2d 371, 383. The Court explained that requiring property owners to sign a petition was an acceptable condition because it did not require the property owners to waive any review procedures for the annexation itself. The condition did not require a property owner to waive other rights, such as the right to either

¹² *City's Response and Cross Appeal Brief*, pages 17, 46.

¹³ *Id.* at 46.

speaking against the annexation in a public proceeding or to appeal a boundary review board decision on the annexation. *Id.* at 386. However, the *Yakima County Fire District* Court ruled that Yakima's attempt to require property owners to promote annexation was unlawful. *Id.* at 394-395. Contrary to the City's argument, *Yakima County Fire District* most definitely does not stand for the proposition that the City can require actual annexation as a precondition to sewer service where the City is the exclusive sewer provider or otherwise has held itself out as a service provider to the area. To the contrary, the Court's holding would, by extension, now allow what this City has attempted under Ordinances 3472 and 3473.

Here, the City is the exclusive provider of sewer service and held itself out as such until Ordinances 3472 and 3473. Prior to Ordinances 3472 and 3473, Mount Vernon Municipal Code ("MVMC") Section 13.08.060 provided that the City would allow property in the unincorporated UGA to connect to sewer only subject to fees, utility construction standards, and agreement to sign any petition for annexation. This is substantially similar to the fact pattern in *Yakima County Fire District* (except Mount Vernon did not try to impose a "promote

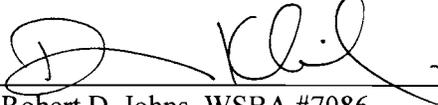
annexation” clause). Further, no other sewer service provider exists to serve the unincorporated UGA.¹⁴

V. CONCLUSION

Based on the foregoing analysis, Appellant Skagit DO6 respectfully requests that the Court conclude that the Board did have jurisdiction over Ordinances 3472 and 3473, and that the City was not merely acting in a proprietary capacity, but instead did have a duty toward the unincorporated UGA.

DATED this 14th of October, 2011.

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1977-1 Appellant's Response Brief in Cross Appeal 10-14-11 Final.doc

¹⁴ DR 002137, the Big Lake Sewer District is a closed system, not available to the public.

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ORIGINAL

STATE OF WASHINGTON)
)ss.
COUNTY OF KING)

Evanna L. Charlot, being first duly sworn on oath, deposes and says:

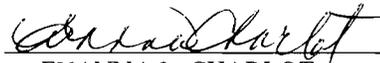
1. I am a citizen of the United States, over the age of 18 years of age, and am competent to testify to the facts herein.
2. On this date, I caused to be served via Legal Messenger Delivery, a true and correct copy of the following documents: APPELLANT'S BRIEF IN RESPONSE TO CROSS APPEAL upon counsel as stated below:

Kevin Rogerson, Esq. P. Stephen DiJulio, Esq. Mount Vernon City Attorney's Office 910 Cleveland Avenue Mount Vernon, WA 98273-4231 kevinr@mountvernonwa.gov <i>Attorneys for Resp. City of Mt. Vernon</i>	In Association with: Susan Elizabeth Drummond, Esq. Law Office of Susan Drummond 1200 5th Avenue Suite 1650 Seattle, WA 98101-3299 Tel: 206-682-0767 susan@susandrummond.com <i>Attorney for Resp. City of Mount Vernon</i>
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Pursuant to RCW 9A.72.085, I certify under penalty of perjury under the laws of the State of Washington that the foregoing statement is true and correct.

DATED this 14th day of October, 2011, in Bellevue, Washington.


EVANNA L. CHARLOT

STATE OF WASHINGTON)
)ss.
COUNTY OF KING)

SIGNED AND SWORN to (or affirmed) before me on October 14, 2011 by Evanna L. Charlot




Darrell S. Mitsunaga (print name)
Notary Public residing in Sammamish, WA.
My appointment expires 1-28-13