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NO. 102177-1

SUPREME COURT OF THE STATE OF WASHINGTON

KING COUNTY,

Respondent,

v.

FRIENDS OF SAMMAMISH VALLEY, et al., and
FUTUREWISE,

Petitioners.

KING COUNTY'S CONSOLIDATED ANSWER TO AMICI
MEMORANDI OF SIERRA CLUB AND BOUNDY-
SANDERS & WATERS

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I. ISSUES

A. WAS DIVISION ONE'S DECISION CONSISTENT WITH THE GMA AND NOT A SIGNIFICANT QUESTION OF PUBLIC INTEREST?

1. IN A AND RA ZONES MUST RETAIL SALES BE ACCESSORY TO A PRIMARY WBD PRODUCTION USE?

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4. ARE WBDS IN A AND RA ZONES CONSISTENT WITH THE GMA?

B. IS DIVISION ONE'S SEPA ANALYSIS CONSISTENT WITH THE GMA AND APPELLATE AUTHORITIES?

C. SHOULD ISSUES RAISED FOR THE FIRST TIME BY *AMICI* BE REJECTED?

II. INTRODUCTION

Division One's decision analyzed King County Ordinance 19030's ("19030") plain language and concluded that 19030 is consistent with the Growth Management Act ("GMA"). *Amici* reassert erroneous theories briefed in King County's Consolidated Answer to Futurewise and Friends of

Sammamish Valley Petitions for Review (“Answer”), and raise new issues beyond the scope of this case. This Court should not consider issues raised here for the first time.

This brief incorporates the facts and arguments in the Answer, and further explains 19030 and King County Code (“KCC”) content. Wineries and breweries are traditional uses in King County’s Agricultural (“A”) and Rural Area (“RA”) zones.¹ 19030 unambiguously defines wineries, breweries and distilleries (“WBD”) as production uses. Retail Washington state Liquor and Cannabis Board (“WSLCB”) licenses, including nightclubs, bars, and restaurants, are excluded from WBD definitions.²

Under 19030, WBDs in A and RA zones may sell products produced on site, but only as accessory to a primary production use. In A zones, WBD production must also be

¹ CP-AR 008442-8443.

² CP-AR 000098-000100.

accessory to agriculture.³ Under the KCC accessory uses must be subordinate to the primary use.⁴ Division One reversed the Growth Management Hearings Board (“Board”) decision because it ignored 19030’s plain language.⁵ *Amici* arguments are well-intentioned, but misplaced.

III. RESPONSE TO STATEMENTS OF THE CASE

Amici Statements of the Case are based on the false premise that 19030 adds WBDs to the A and RA zones, but it does not. Instead, 19030 amends existing zoning conditions for already present WBD uses. *Amici* Boundy-Sanders and Waters’ Statement of the Case describes city policy concerns, but relies on erroneous, conclusory statements about 19030 and KCC content.⁶ Similarly, *amicus* Sierra Club’s Statement sets forth a list of unsupported conclusions not related to 19030

³ See, i.e. CP-AR 000117:758, CP-AR 000120:809-810.

⁴ KCC 21A.06.013. KCC sections cited herein as attached as appendix A.

⁵ King County v. FOSV, et al, No. 83905-5-I, Slip Op. (“Opinion”), at 20, 24, 30-34, 49.

⁶ Boundy-Sanders Memorandum at 4-9.

plain language.⁷ *Amici* reference WBDs as “urban uses,”⁸ but “urban uses” is not a phrase found in the GMA.⁹ WBDs have long been present in County A and RA zones.

IV. ANALYSIS

Division One’s overarching legal conclusion is that “...the Board erred in interpreting Ordinance 19030 and, as a result, the Board erred in assessing Ordinance 19030’s GMA compliance.”¹⁰ *Amici* arguments are not based on a plain language analysis of 19030 or any facts in the record, they do not establish an issue of significant public interest.

A. 19030'S plain language is consistent with the GMA.

19030 updates WBD development regulations by (in part) adding production requirements,¹¹ arterial access

⁷ Sierra Club Memorandum at 7-8.

⁸ Boundy-Sanders Memorandum at 1, Sierra Club Memorandum at 1, 9, 17.

⁹ See RCW 36.70A *et seq.*

¹⁰ Opinion at 24.

¹¹ CP-AR 000098:452-99:476, 000115:698-702.

requirements,¹² site development criteria and minimum parcel sizes in A zones,¹³ limiting hours of operation,¹⁴ reducing maximum building size,¹⁵ and adding Temporary Use Permit thresholds and conditions.¹⁶ 19030 disallows impactful home-occupation WBDs, and updates definitions.¹⁷ The following excerpt illustrates that *amici* environmental and GMA policy arguments misunderstand 19030's plain meaning:¹⁸

12.a. (~~Limited to wineries, SIC Industry No. 2082-Malt Beverages and SIC Industry No. 2085-Distilled and Blended Liquors~~) **In the A zone, only allowed on sites where the primary use is SIC Industry Group No. 01-Growing and Harvesting Crops or**

¹² CP-AR 000116:724-727.

¹³ CP-AR 000115:703-708.

¹⁴ CP-AR 000116:719-723.

¹⁵ CP-AR 000117:758-118:769.

¹⁶ CP-AR 000170-175.

¹⁷ CP-AR 000098-000100.

¹⁸ WBD II and III uses are similarly conditioned. WBD I uses, are more strictly constrained. Condition 12, included here, applies to WBD III uses. Condition 3 applies to WBD IIs. Discussion focus areas are emphasized in bold for clarity. Underlined language indicates new language, strike-through language has been removed from the Code. Language with neither remains unchanged from former code, or indicates a new section.

No. 02-Raising Livestock and Small Animals; ...

d. Wineries, breweries and distilleries **shall comply with Washington state Department of Ecology and King County board of health regulations for water usage and wastewater disposal ..., and must connect to an existing Group A water system.**

....

f. ...**In the A zone, sixty percent or more of the products processed must be grown ((in the Puget Sound counties)) on-site.** ...

h. In the A zone, structures and areas for non-agricultural winery, brewery, distillery facility uses shall be located on portions of agricultural lands that are unsuitable for agricultural purposes, such as areas within the already developed portion of such agricultural lands that are not available for direct agricultural production, or areas without prime agricultural soils. No more than one acre of agricultural land may be converted to a nonagricultural accessory use;

i. **Tasting and retail sales of products produced on-site may occur only as accessory to the primary winery, brewery, distillery production use** and may be provided in accordance with state law...¹⁹

Amici erroneously surmise that 19030's plain language disguises a hidden meaning allowing retail sales unrelated to

¹⁹ CP-AR 000117:754-121:833.

any actual WBD production.²⁰ However, Council Findings and long-standing KCC definitions are to the contrary. The Council found:

S. This ordinance protects the Rural Area and Agricultural zones by limiting on-site tasting of products and retail sales for winery, brewery, distillery manufacturing uses, and by allowing on-site tasting of products and retail sales only as accessory to production. ...²¹

Division One rejected the “sleight-of-hand” theory as contrary to 19030’s plain language.²² This Court should too.

1. 19030 only allows accessory retail sale of products produced on site.

KCC Chapter 21A.06 contains definitions of uses listed in KCC 21A.08.²³ It defines an “accessory use” as

- A use, structure or activity that is:
- A. Customarily associated with a principal use;
 - B. Located on the same site as the principal use; and
 - C. **Subordinate and incidental to the principal use.**²⁴

²⁰ Boundy-Sanders at 10-13.

²¹ CP-AR 000088:211-217 (emphasis added).

²² Opinion at 33-35.

²³ KCC 21A.06.005.

²⁴ KCC 21A.06.013. (Emphasis added.)

Chapter 21A.08 contains land use tables that “...determine whether a specific use is allowed in a zone district.”²⁵ Under KCC 21A.08.025, accessory uses are prohibited if not “expressly permitted”.²⁶

Under 19030, in A and RA zones “[t]asting and retail sales of products produced on-site may occur only as accessory to the primary winery, brewery, distillery production use.”²⁷ Under KCC 21A.08.025, accessory uses not expressly permitted “...shall be prohibited....”²⁸ 19030 only expressly allows accessory retail sales of “products produced on-site.” This Court should reject the argument that 19030’s limited allowance for sale of products produced on site **implies** an allowance for unlimited retail sales of products produced elsewhere.²⁹

²⁵ KCC 21A.08.020.

²⁶ KCC 21A.08.025.

²⁷ CP-AR 000101, 000103:509-000104:513.
(Emphasis added.)

²⁸ KCC 21A.08.025.

²⁹ Boundy-Sanders at 10-11.

If a statute’s meaning is plain on its face, courts must give effect to that plain meaning as an expression of legislative intent.³⁰ 19030 must be construed to avoid unlikely or strained consequences.³¹ Under the KCC, accessory uses that are not **expressly** allowed are prohibited. Arguments that 19030 allows unlimited retail sales uses in RA and A zones ignore Council findings, KCC accessory use regulations, and 19030 plain language and should be rejected.

2. WBDs are production uses.

As noted in section A.1, above, KCC Chapter 21A.06 contains definitions of uses listed in KCC Chapter 21A.08. KCC Chapter 21A.08 contains tables that “...determine whether a specific use is allowed in a zone district.”³² *Amici* arguments that references to “state law” in WBD definitions

³⁰ *Wood v. Kittitas County*, 162 Wn.2d 579, 608, 174 P.3d 25, 30 (2007).

³¹ *Sundquist Homes, Inc. v. Snohomish County Public Utility Dist. No. 1*, 140 Wn.2d 403, 409, 997 P.2d 915, 918 (2000).

³² KCC 21A.08.020.

allow unlimited retail sales³³ miss the difference between KCC 21A.06 definitions and KCC 21A.08 regulations.

19030 replaced previous definitions, which lacked specificity. 19030 definitions detail production elements and exclude WSLCB retail licenses. A winery, brewery, distillery III is defined as

A production facility licensed by the state of Washington to produce adult beverages such as wine, cider, beer and distilled spirits and **that includes an adult beverage production use such as crushing, fermentation, distilling, barrel or tank aging, and finishing.** A winery, brewery, distillery facility III may include additional production-related uses such as vineyards, orchards, wine cellars or similar product-storage areas as authorized by state law, on-site tasting of products and sales as authorized by state law and sales of merchandise related to products available as authorized by state law. **"Winery, brewery, distillery facility III" does not include any retail liquor licenses that would be authorized by chapter 314-02 WAC³⁴.**

³³ Boundy-Sanders at 11.

³⁴ WAC 314-02-014, WAC 314-02-015, WAC 314-02-036.

19030 development conditions newly impose minimum production requirements, which did not exist in the former code:

....f. At least two stages of production of wine, beer, cider or distilled spirits, such as crushing, fermenting, distilling, barrel or tank aging, or finishing, as authorized by the Washington state Liquor and Cannabis Board production license, shall occur on-site. At least one of the stages of production occurring on-site shall include crushing, fermenting or distilling.³⁵

Because 19030 limits retail sales to products produced on site, and only as subordinate to WBD production, the Court should conclude that *amici* concerns about unfettered retail sales are unfounded.

3. A zone WBDs must be accessory to agricultural use.

In addition to accessory retail sales limits discussed in section A.2, above, in A zones WBDs must be accessory to a primary agricultural use, and 60% of source fruit must be grown on site.³⁶ New siting conditions track RCW 36.70A.177:

³⁵ CP-AR 000119:798-802.

³⁶ CP-AR 000119:793-797.

12.a. (~~Limited to wineries, SIC Industry No. 2082-
Malt Beverages and SIC Industry No. 2085-Distilled
and Blended Liquors~~) **In the A zone, only allowed
on sites where the primary use is SIC Industry
Group No. 01-Growing and Harvesting Crops or
No. 02-Raising Livestock and Small Animals;**

...

Strained arguments that growing enough fruit or grain to produce "... one on-site barrel labeled 'fermenting' and another labeled 'mixing' or 'aging'"³⁷ would justify unlimited retail sales of products grown elsewhere miss the accessory use limits in KCC 21A.08.025, discussed in section A.1 and 2, above.

A zone WBDs must be subordinate to agriculture, and retail sales must be subordinate to production. 60% of products must be sourced on-site. The "two barrels" theory is contrary to 19030's plain language.

4. WBDs in A and RA zones are consistent with the GMA.

Amici's unsupported claim that manufacturing uses are "... fundamentally urban and urban-serving..."³⁸ is erroneous.

³⁷ Boundy-Sanders at 11, 13.

³⁸ *Id.* at 19.

Manufacturing uses are common in A and RA zones.³⁹ The GMA’s rural area policy supports traditional economic activities, rural area jobs, and that “many businesses in rural areas fit within the definition of rural character...”⁴⁰

Similarly, the GMA’s inclusion of “viticulture” within its “Agricultural Land” definition⁴¹ supports the conclusion that WBDs are within the category of accessory uses appropriately sited in agricultural areas. Viticulture is “the cultivation or culture of grapes especially for wine-making.”⁴²

RCW 36.70A.177(3)(b)(i) allows accessory uses including “distribution, and marketing of regional agricultural products from one or more producers,” creation of “value added agricultural products,” and “agriculturally related experiences.”

Amici arguments that WBDs cannot be allowed in A zones because they are production uses is not supported by RCW

³⁹ Manufacturing use table, CP-AR 000110-000113.

⁴⁰ RCW 36.70A.011.

⁴¹ RCW 36.70A.030(3).

⁴² Viticulture Definition and Meaning, Merriam-Webster Online Dictionary.

36.70A.177.⁴³ No analysis supports the conclusion that wine, beer and distilled liquor are not “...value added agricultural products.” *Amici* show no basis for further review.

B. Division One’s SEPA analysis is consistent with the GMA.

In this case, Division One found that when considered as a whole, “... in agricultural areas 19030 restricts WBD uses to those that are accessory within the meaning of the KCC and section .177 to primary uses of growing crops or raising livestock, and in rural areas it restricts them to uses accessory to primary production uses.”⁴⁴ Although unsatisfied with the County’s initial SEPA checklist, Division One found that when “...correctly interpreted, Ordinance 19030 is more restrictive than the Board interpreted it to be, [the SEPA official] was correct to conclude that it would be speculative to forecast that it will result in redevelopment of the Sammamish Valley to any

⁴³ Boundy-Sanders at 19.

⁴⁴ Opinion at 48-49.

identifiable degree.”⁴⁵ Division One concluded that “Ordinance 19030 does not violate the GMA.”⁴⁶

In *Davidson Serles & Assocs. v. Cent. Puget Sound Growth Mgmt. Hearings Bd*,⁴⁷ Division One analyzed GMA SEPA remedies. Citing *Skagit Surveyors & Eng'rs, LLC v. Friends of Skagit Cnty*⁴⁸, the *Davidson Serles* court noted that the Board’s power is “... strictly limited by statute.” Although under RCW 36.70A.300(3) the Board may find noncompliance and remand, regulations remain valid unless a determination of invalidity is made.

Next, the court cited RCW 36.70A.302:

[t]he board may determine that part or all of a comprehensive plan or development regulations are invalid if the board ... (b) Includes in the final order a determination, supported by findings of fact and conclusions of law, that the continued validity of part or parts of the plan or regulation

⁴⁵ *Id.* at 49.

⁴⁶ *Id.*

⁴⁷ 159 Wash. App. 148, 155, 244 P.3d 1003, 1006 (2010).

⁴⁸ 135 Wash.2d 542, 558, 958 P.2d 962 (1998).

would substantially interfere with the fulfillment of the goals of this chapter...⁴⁹.

Thus, the Board may invalidate a regulation *only if* its continued validity will substantially interfere with the fulfillment of GMA goals, not due only to SEPA error.

Finally, the GMA requires additional processes after an invalidity finding. The Board must consider evidence arising after adoption of an invalidated ordinance⁵⁰ and rescind invalidity if it no longer interferes with GMA goals.⁵¹

Here Division One found “... 19030 does not violate the GMA...”⁵² Because 19030 complies with the GMA, invalidity cannot be supported. The County’s 2020 checklist was properly considered under the WAC. This case does not present issues of substantial public interest.

⁴⁹ *Davidson Serles* at 157, citing 36.70A.302(1)(b) (emphasis added).

⁵⁰ WAC 242-03-850.

⁵¹ RCW 36.70A.302(7)(a).

⁵² Opinion at 49.

C. New issues raised in *amici* memorandi should be rejected.

Courts do not address new arguments raised by *amicus*.⁵³

The County reasserts its objections to new arguments raised by *amici* as stated in its September 15, 2023, Consolidated Objections to *Amici* Motions.

V. CONCLUSION

This case does not meet the review criteria set forth in RAP 13.4. The Petitions should be denied.

Certificate of Compliance

This document contains 2,485 words, excluding the parts of the document exempted from the word count by RAP 18.17.

⁵³ *Citizens for Responsible Wildlife Mgmt. v. State*, 149 Wn.2d 622, 631, 71 P.3d 644, 649 (2003), *Sunquist Homes, Inc. v. Snohomish County Pub. Util. Dist. No. 1*, 140 Wn.2d 403, 413, 997 P.2d 915 (2000).

DATED this 4th day of October, 2023.

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CERTIFICATE OF SERVICE

I, Monica Erickson, declare that I am over the age of 18 years, not a party to this action, and competent to be a witness herein.

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Appendix A

King County Code Sections

21A.06.005 Scope of chapter. This chapter contains definitions of technical and procedural terms used throughout the code and definitions of land uses listed in tables in K.C.C. 21A.08. The definitions in this chapter supplement the standard Industrial Classification Manual (SIC). See K.C.C. 21A.02 for rules on interpretation of the code, including use of these definitions. Development standards are found in K.C.C. 21A.12 through K.C.C. 21A.38. (Ord. 10870 § 41, 1993).

21A.06.013 Accessory use. Accessory use: a use, structure or activity that is: A. Customarily associated with a principal use; B. Located on the same site as the principal use; and C. Subordinate and incidental to the principal use. (Ord. 17841 § 6, 2014).

21A.08.020 Interpretation of land use tables. A. The land use tables in this chapter determine whether a specific use is allowed in a zone district. The zone district is located on the vertical column and the specific use is located on the horizontal row of these tables. B. If no symbol appears in the box at the intersection of the column and the row, the use is not allowed in that district, except for certain temporary uses. C. If the letter "P" appears in the box at the intersection of the column and the row, the use is allowed in that district subject to the review procedures specified in K.C.C. 21A.42 and the general requirements of the code. D. If the letter "C" appears in the box at the intersection of the column and the row, the use is allowed subject to the conditional use review procedures specified in K.C.C. 21A.42 and the general requirements of the code. E. If the letter "S" appears in the box at the intersection of the column and the row, the regional use is permitted subject to the special use permit review procedures specified in K.C.C. 21A.42 and the general requirements of the code.

F. If a number appears in the box at the intersection of the column and the row, the use may be allowed subject to the appropriate review process indicated above, the general requirements of the code and the specific conditions indicated in the development condition with the corresponding number immediately following the land use table. G. If more than one letter-number combination appears in the box at the intersection of the column and the row, the use is allowed in that zone subject to different sets of limitation or conditions depending on the review process indicated by the letter, the general requirements of the code and the specific conditions indicated in the development condition with the corresponding number immediately following the table. H. All applicable requirements shall govern a use whether or not they are crossreferenced in a section. (Ord. 10870 § 329, 1993).

21A.08.025 Accessory uses prohibited if not expressly permitted. Any accessory use not expressly permitted by this chapter or by the director shall be prohibited. The director may determine whether any accessory use on a site is incidental or subordinate to a principal use on the same site and whether uses not listed as accessory uses are customarily associated with a principal use. The director shall consider the purpose of the zone in K.C.C. chapter 21A.04 in making these determinations. (Ord. 17841 § 23, 2014).

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