No. 97233-8

SUPREME COURT OF THE STATE OF WASHINGTON

(Court of Appeals No. 50363-8-II)

SUMMIT-WALLER COMMUNITY ASSOCIATION and
NORTH CLOVER CREEK / COLLINS COMMUNITY COUNCIL,

Petitioners,

v.

PIERCE COUNTY, APOGEE CAPITAL LLC AND
HIGH VALLEY INVESTMENT, L.L.C.,

Respondents.

RESPONDENT APOGEE CAPITAL LLC AND HIGH VALLEY INVESTMENT LLC'S OPPOSITION TO PETITION FOR REVIEW

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I. INTRODUCTION

To help it evaluate amendments made as part of its periodic Comprehensive Plan update, the Pierce County Council has a list of information/criteria that it wants to review, found at former Pierce County Code (PCC) 19C.10.065(A). This regulation is the Council's way of telling Pierce County Planning and Land Services staff (PALS): "Here is what we want you to bring us in your Staff Report."

The procedure itself is not required by the Growth Management Act (GMA). The County could have asked PALS to provide more information than what is in PCC 19C.10.065(A), or less information, or different information. The procedure is simply for the Council's benefit; it is a tool for the Council. If the Council is satisfied with the information it has received through the evaluation process, the purpose of PCC 19C.10.065(A) is satisfied.

As part of its 2015 periodic update (the Update), Pierce County reviewed and accepted several proposed amendments, including Amendment M-2 (M-2). PALS evaluated M-2 using the criteria in PCC 19C.10.065(A) and determined the parcels in question did not meet the current land use designation (industrial) or the designation proposed by the applicant Apogee Capital LLC and High Valley Investment LLC (Apogee) (commercial + multi-family housing). The Mid-County Land Use

Advisory Commission (MCAC), the Pierce County Planning Commission (Planning Commission), and the County Council all agreed that the current zoning was inappropriate. They also decided that the zoning proposed by Apogee was too broad. However, they all agreed that a more limited subset of the proposed zoning (just multi-family housing) made sense. PALS recommended this subset and the MCAC, Planning Commission, and County Council all agreed.

The MCAC, Planning Commission, and County Council were all satisfied with PALS' evaluation and the information it provided in its staff report. The evaluation process did what it was supposed to do. Through the process, the County learned what zoning worked for these parcels and what zoning did not work. The outcome, the adoption of multi-family residential zoning, is consistent with the Comprehensive Plan and the GMA.

Summit-Waller Community Association and North Clover Creek/Collins Community Council (Summit-Waller) do not want multi-family residential zoning in this area and challenged the format of PALS' staff report, claiming PALS' evaluation in this case was insufficient.

But on review, the Growth Management Hearings Board (Board), Superior Court, and Court of Appeals all affirmed that the evaluation process in this case worked as designed and resulted in a correct outcome.

The County's adoption of M-2 was the result of a whole series of steps, evaluations, opportunities for public participation, and a lot of information. In the end, the MCAC, the Planning Commission, the County Council, the Board, the Superior Court, and the Court of Appeals all reached the same conclusions: (1) the current zoning and proposed zoning (just multi-family) fit; (2) a subset of the proposed zoning is correct; (3) the information PALS provided was sufficient; and (4) M-2 is consistent with the County's Comprehensive Plan and the GMA.

There is no issue in this case that warrants review by the Supreme Court.

II. IDENTITY OF RESPONDENTS

Apogee owns the property at issue in this case and initiated M-2. Apogee asks the Court to deny Summit-Waller's Petition for Review.

III. COURT OF APPEALS OPINION

On February 6, 2019, the Court of Appeals, Division II, filed *Summit-Waller Community Association v. Pierce County*, No. 50363-8-II, slip op. (2019), and held, in relevant part, that Summit-Waller failed to meet its burden of showing that M-2 violates the GMA and that Summit-Waller waived the issues of public notice and public participation.

IV. ISSUE STATEMENTS

A. *Thurston County v. Western Wash. Growth Management Hearings Board*, 164 Wn.2d 329, 190 P.3d 38 (2008) and *Kittitas County v. Eastern Wash. Growth Management Hearings Board*, 172 Wn.2d 144, 256 P.3d 1193 (2011) stand for the propositions, respectively, that if a county amends a comprehensive plan it must comply with the GMA, and that county development regulations must also comply with the GMA. Is the Court of Appeals decision here consistent with these cases when the court held that (1) Summit-Waller did not challenge the adoption or amendment of a development regulation, (2) Summit-Waller failed to cite any authority to support its proposition that the County's alleged failure to adhere to its procedures for amendments to the comprehensive plan violated the GMA, and (3) Summit-Waller failed to show that the adoption of Amendment M-2 violated the GMA?

B. Under the GMA, "[i]ssues not raised before [the Board] may not be raised on appeal." RCW 32.05.554(1). The Court of Appeals in this case held that Summit-Waller waived the issues of public notice and public participation by failing to raise them before the Board. Does this portion of the Court of Appeals decision present an issue of substantial public interest?

V. STATEMENT OF THE CASE

This case involves eight parcels in Pierce County's Mid-County Community Plan (MCCP) area, totaling around 34 acres. The parcels are adjacent to and just north of 121st Street East and are within the Urban Growth Area (UGA). The parcels are bordered to the east by railroad tracks that are not accessible from the site. The surrounding area is a mix of industrial, commercial and residential uses.

A. The County's Adoption of M-2

In the summer of 2014, the County reviewed 27 proposed amendments as part of the County's normal bi-annual program for amendments.[1] Because this process coincided with the periodic Update, and in an effort to work efficiently in-light-of limited resources and time constraints, the County revised its procedures for amendments to the Comprehensive Plan so that all amendments and the Update could be considered in the same package.[2] The County adopted M-2 as part of this review.

M-2 requested the reclassification of eight parcels from Employment Center (EC) to Community Center (CC) land use designation. EC allows industrial and commercial uses but does not allow multi-family

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[1] AR 1415.
[2] Pierce County Ordinance 2014-31s, at AR 1675-1676.

housing. CC on the other hand would allow both commercial and multi-family housing.

Upon review, PALS Staff determined that the properties did not meet the criteria for either the proposed CC or the existing EC designation because the properties were not suitable for industrial or commercial uses. Instead, PALS proposed a subset of the CC zoning, High-Density Residential District (HRD). Like CC this allows for multi-family housing, but unlike CC it does not allow commercial uses.

PALS presented an analysis of Amendment M-2 to the Pierce County Planning Commission.[3] In its Staff Report, PALS analyzed the proposal's impacts using the factors in PCC 19C.10.065(A)[4] and concluded

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[3] PALS first suggested that the properties did not meet the criteria for either EC or CC designation and proposed an alternative that would allow for multi-family residential to the MCAC at its November 4, 2014 meeting. The MCAC voted to support PALS' recommendation and to work toward a redesignation that would support multi-family residential.

[4] PCC 19C.10.065(A) provides as follows:

A. During a required GMA periodic update, the Planning and Land Services Department shall evaluate Council-initiated amendments based upon the following:

1. Is there a community or countywide need for the proposed amendment? If so, what is that need?
2. Is the infrastructure available to support the requested amendment, such as sewer, water, roads, schools, fire support?
3. Would the requested amendment provide public benefits? If so, what sorts of public benefits?
4. Are there physical constraints on the property?
5. Are there environmental constraints, such as noise, access, traffic, hazard areas on or adjacent to the proposed amendment?
6. What types of land use or activities are located on the property?
7. What types of land use or activities are located on neighboring properties?
8. Is the proposed amendment consistent with all applicable state and local planning policies?

that the proposal was not consistent with the Comprehensive Plan policies for expanding a CC designation; however, PALS suggested that "a higher density residential designation may be more appropriate as a transition into the surrounding neighborhood."[5] The Planning Commission asked PALS to prepare an alternative recommendation to accommodate multi-family residential development on the M-2 site.[6]

Accordingly, as an alternative to CC, PALS recommended that the Planning Commission add the HRD land use designation and Moderate High-Density Residential (MHR) zoning classification to the Comprehensive Plan and apply this designation and zoning to the eight M-2 parcels.[7] HRD was more limiting than CC, permitting a subset of what

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[5] AR 1701.

[6] Minutes from 12/4/2014 Planning Commission meeting, at AR 1710.

[7] Staff Report Errata Sheet #1 dated 12/9/2014, at AR 92-94. *See* PCC 18A.27.010 for MCCP Urban Zone Classification use tables. The difference between EC, CC, and HRD as applied to the M-2 properties is generally summarized as follows:

	EC (Original Land Use Designation)	**CC** (Land Use Designation Proposed by Apogee)	**HRD/MHR** (Use Designation/Zone Combination proposed by PALS and approved in M-2)
Industrial Uses	**Allowed**	Few Allowed	Not Allowed
Commercial Uses	**Allowed**	**Allowed**	Not Allowed
Multi-Family Housing	Not Allowed	**Allowed**	**Allowed**

CC would have allowed—i.e., it allowed apartments without the additional commercial uses.

The Planning Commission voted to recommend approval of M-2 as proposed by PALS. The amendment was subsequently adopted by the Pierce County Council.[8] The Council made several findings of fact in support of adopting M-2:

> [The redesignated] area does not meet policies for locating EC designations, because the site is (1) not large enough to accommodate rail spurs or heavy transportation infrastructure, (2) not connected with the business pattern of EC along 112th Street East, (3) encumbered by critical areas; and (4) surrounding incompatible uses and zoning which could limit EC use.[9]

The eight parcels included in M-2 were redesignated HRD/MHR by the County Council.[10]

B. The Board's Decision

Summit-Waller challenged M-2 before the Board. Summit-Waller argued that Pierce County's adoption of M-2 failed to comply with RCW 36.70A.130(1)(d), which requires:

> Any amendment of or revision to a comprehensive land use plan shall conform to this chapter. Any amendment of or revision to development regulations shall be consistent with and implement the comprehensive plan.

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[8] Finding of Fact #165, at AR 1898-99.
[9] Findings of Fact #106 and 165, at AR 1896-99.
[10] Findings of Fact #106 and 165, at AR 1896-99.

The reasons relied upon by Summit-Waller were: (1) that the evaluation began as an evaluation of CC and not MHR, which was ultimately recommended, and (2) in evaluating M-2 under PCC 19C.10.065(A), PALS staff answered "undetermined" as to one factor—whether a community or countywide need for the amendment existed.[11] The Board rejected these arguments:

> Petitioners apparently envision this evaluation-recommendation process as one where a proposal must be accepted as is or rejected, in which case the applicant must presumably wait until the next cycle to try again. The Board disagrees. The language of the resolution directs the PALS staff and the Commissioners to review the proposal and make recommendations. Nowhere is there a prohibition against modification of a proposal in light of the review and recommendation. In this case, following the requirements of PCC 19C.10.065 for Council initiated amendments, PALS staff evaluated the M-2 proposal "based on" the eight criteria identified in the code. The fact that the existence of a community need was considered "undetermined" does not, in the Board's view, negate the evaluation—particularly where there is no showing that the County requires more than a recommendation based on the review. In other words, it does not appear that a proposal must necessarily "satisfy" each and every criterion.[12]

The Board held that Summit-Waller did not show "that the County failed to evaluate the amendment as required by PCC 19C.10.065(A) or that the adoption of M-2 was inconsistent with the Comp Plan in violation of RCW 36.70A.130(1)(d)."[13]

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[11] AR 2080.
[12] AR 2082.
[13] AR 2083

Summit-Waller also referenced RCW 36.70A.130(2) in its appeal to the Board, which addresses a requirement for public notice and participation, but did not provide briefing or arguments to the Board on this issue. The Board determined the "allegation that M-2 violated RCW 36.70A.130(2) was not briefed and is deemed abandoned."[14]

C. The Court of Appeals Decision

In its unpublished opinion, filed on February 6, 2019 and amended on April 23, 2019, the Court of Appeals first recognized that while appellate courts review the Board's legal conclusions de novo, courts also give "substantial weight to the Board's interpretation of the GMA."[15]

In response to Summit-Waller's argument regarding conformance with the GMA and the Comprehensive Plan, the Court of Appeals noted that "RCW 36.70A.130(1)(d) is the *only* GMA provision under which [Summit-Waller] preserved an argument related to the County's evaluation of Amendment M-2 under former PCC 19C.10.065(A)."[16] The Court then noted:

> Amendment M-2 was an area-wide amendment to the Comprehensive Plan. As such, the second sentence of RCW 36.70A.130(1)(d) does not apply to this case because [Summit-Waller] do[es] not challenge a development regulation amendment. Instead, [Summit-Waller] challenge[s] a

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[14] *Id.*
[15] *Summit-Waller Comm. Ass'n v. Pierce County*, No. 50363-8-II, slip op. at 21 (Feb. 6, 2019).
[16] *Id.* (emphasis added).

> comprehensive plan amendment and must show that amendment M-2 did not conform to the GMA. RCW 36.70A.130(1)(d).[17]

The Court held that Summit-Waller

> cite[s] no authority to support the proposition that a County's alleged failure to adhere to its procedures for amendments to the comprehensive plan violates RCW 36.70A.130(1)(d)....
>
> The GMA does not require an evaluation of the eight factors enumerated under former PCC 19C.10.65(A). And the Board concluded that the plain meaning of former PCC 19C.10.65(A) did not "require[] more than a recommendation based on the review" and did not require that a "proposal must necessarily 'satisfy' each and every criterion." [Summit-Waller] failed to show that the County did not evaluate amendment M-2 as required under PCC 19C.10.065(A).[18]

In fact, the Court of Appeals found that PALS considered the eight factors under former PCC 19C.10.065(A) and evaluated the HRD redesignation.[19]

Finally, the Court of Appeals noted that

> [e]ven if the County failed to evaluate Amendment M-2 as required by former PCC 19C.10.65(A), [Summit-Waller] ha[s] failed to show that alleged failure means that Amendment M-2 to the Comprehensive Plan does not conform to the GMA.[20]

Regarding Summit-Waller's public notice and participation argument, the Court of Appeals determined that Summit-Waller failed to raise the argument in front of the Board, so the County did not have a chance

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[17] *Id.* (emphasis added).
[18] *Id.*, at 22.
[19] *Id.*, at 23.
[20] *Id.*

to develop the record to demonstrate it provided the required public notice and opportunity for public participation.[21]

VI. ARGUMENT

A Petition for Review will be accepted by this Court *only* if (1) the Court of Appeals' decision conflicts with a decision of the Supreme Court; (2) the Court of Appeals' decision conflicts with another published decision of the Court of Appeals; (3) a significant question of law under the Washington State Constitution or the United States Constitution is involved; or (4) the petition involves an issue of substantial public interest that should be determined by the Supreme Court. RAP 13.4(b).

A. Summit-Waller misrepresents the Court of Appeals Decision Regarding the County's Evaluation of Amendment M-2

Summit-Waller's main contention is that the Court of Appeals allegedly "fail[ed] to require the Comprehensive Plan Amendment to be evaluated under PCC 19C.10.065(A)(1-8)." This is inaccurate. The Court of Appeals determined that PALS *did* comply with PCC 19C.10.065(A).

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[21] *Id.*, at 29. Summit-Waller moved for reconsideration. The Court denied the motion but amended its decision to address Summit-Waller's argument regarding the GMA planning goal of encouraging economic development, RCW 36.70A.020(5). On this issue the Court held:

> Contrary to RAP 10.3(a)(6), [Summit-Waller] fail[s] to cite facts or legal authority that show that the County failed to properly consider economic development or that the adoption of Amendment M-2 violates the GMA. We hold the Board did not err.

April 23, 2019 Order Amending Unpublished Opinion, at 3.

The selected sentences Summit-Waller cites from the Court of Appeals decision do not support its position.

1. The Court of Appeals Determined That PALS Complied with PCC 19C.10.065(A)

The Court of Appeals determined that PALS "submitted a staff report to the Pierce County Planning Commission ... analyzing Amendment M-2 based on the criteria enumerated under former PCC 19C.10.065(A)."[22] The Court noted that PALS answered "undetermined" in response to one of the eight factors, but reiterated that PCC 19C.10.065(A) did not require that the proposal must "satisfy" each and every criterion.[23] Rather, the procedure required PALS only to evaluate the amendment based on the criteria and provide a recommendation.[24] The record shows the County complied with this requirement.[25] Thus, the Court of Appeals did not fail to require compliance with PCC 19C.10.065(A). Instead, it explicitly found that the County complied with the procedure.

2. The Sentences from the Court of Appeals Decision that Summit-Waller Cites do not Support its Position.

First, the Court of Appeals determined that "[t]he GMA does not require an evaluation of the eight factors enumerated under former PCC

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[22] *Summit-Waller Comm. Ass'n v. Pierce County*, No. 50363-8-II, slip op. at 5 (Feb. 6, 2019).
[23] *Id.*, at 25.
[24] *Id.*
[25] AR 1701.

19C.10.065(A)."[26] This is correct. There is nothing in the GMA that requires this procedure and Summit-Waller has cited no authority on this point. The criteria in PCC 19C.10.065(A) simply represents information the County Council said it wanted PALS staff to present. It is a tool for the County Council so that it can make an informed decision. The Council was satisfied with the information PALS provided.

Second, the Court of Appeals determined that the plain language of former PCC 19C.10.065(A) "requires that PALS evaluate a Council-initiated amendment, not the factors or facts related to those factors. Additionally, no one factor is determinative."[27] The Court made this statement in explaining that the there is no requirement that the County provide a detailed, written analysis of each criterion.[28] The statement is accurate in that PCC 19C.10.065(A) requires PALS to "evaluate Council-initiated amendments" considering certain factors and then provide a recommendation. In any event, the Court of Appeals did not rely on this statement in making its decision, as the court explicitly determined that the County *did* evaluate the amendment based on the factors in PCC 19C.10.065(A).

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[26] *Summit-Waller Comm. Ass'n v. Pierce County*, No. 50363-8-II, slip op. at 22 (Feb. 6, 2019).
[27] *Id.*, at 25.
[28] *Id.*

Third, the Court of Appeals determined that:

> Even if the County failed to evaluate Amendment M-2 as required by former PCC 19C.10.065(A), [Summit-Waller] ha[s] failed to show that alleged failure means that Amendment M-2 to the Comprehensive Plan does not conform to the GMA.[29]

The Court stated this a different way in the decision when it determined that Summit-Waller "cite[s] no authority to support the proposition that a County's alleged failure to adhere to its ***procedures*** for amendments to the comprehensive plan violates RCW 36.70A.130(1)(d)."[30] Both of these statements are accurate.

As the Court of Appeals noted, "RCW 36.70A.130(1)(d) is the only GMA provision under which [Summit-Waller] preserved an argument related to the County's evaluation of M-2 under former PCC 19C.10.065(A)."[31] And because Summit-Waller did not challenge a development regulation amendment, the sole issue is whether Summit-Waller met its burden of showing that M-2 fails to conform to the GMA. Summit-Waller did not meet its burden. The Board and the Court of Appeals both determined that Summit-Waller failed to show, by citation to facts or legal authority, that M-2 violates the GMA.

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[29] *Id.*, at 22.
[30] *Id.*, at 21 (emphasis added).
[31] *Id.*

B. The Court of Appeals Decision Does Not Conflict with Supreme Court Case Law.

Having failed to establish that M-2 violates the GMA, Summit-Waller instead argues that the County's alleged failure to adhere strictly to its review procedure conflicts with Supreme Court cases. This is incorrect. *Thurston County v. Western Wash. Growth Management Hearings Board*, 164 Wn.2d 329, 190 P.3d 38 (2008) and *Kittitas County v. Eastern Wash. Growth Management Hearings Board*, 172 Wn.2d 144, 256 P.3d 1193 (2011) stand, in relevant part, for the proposition that comprehensive plans and development regulations must be consistent with each other, and that both must comply with the GMA. Summit-Waller has not alleged that the County's Comprehensive Plan and PCC 19C.10.065(A) are inconsistent with each other and has not alleged that either the Comprehensive Plan or PCC 19C.10.065(A) fail to comply with the GMA.

Further, Summit-Waller has provided no authority to support its assertion that failure to meet a county procedure that articulates what information the County Council wants to see in the Staff Report, and that is not required by the GMA, constitutes a violation of the internal consistency requirements addressed in *Thurston County* and *Kittitas County*.[32]

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[32] If the evaluation results in an amendment that does not comply with the GMA, that would be a different matter. That is not what occurred here.

C. The Court's Ruling on Notice and Participation Does Not Raise an Issue of Substantial Public Interest

The Court of Appeals correctly determined that Summit-Waller waived the issues of public notice and public participation by failing to raise them before the Board, and that no exception to this waiver applies.[33] In its Petition for Review, Summit-Waller claims it was "completely blindsided" by the County's decision to change the designation from EC to HDR, rather than from EC to CC.

This distinction is without merit. Discussion of a redesignation to CC necessarily included the same analysis of multi-family residential development as a redesignation to HRD. HRD is a subset of CC, as it allows multi-family residential but does not allow commercial uses. As it was, the notification sent and published by the County complied with GMA requirements and served its purpose of putting nearby property owners on notice of the redesignation procedures.

Waiver is based on fairness principles. The Court of Appeals held: "The County argues ... that it did not have a chance to develop the record to demonstrate that it provided the required public notice and opportunity for public participation.... We agree with the County."[34]

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[33] *Summit-Waller Comm. Ass'n v. Pierce County*, No. 50363-8-II, slip op. at 28-31 (Feb. 6, 2019).
[34] *Id.*, at 28.

Summit-Waller has provided no reason for why it failed to raise and brief this issue in front of the Board. This aspect of the Court of Appeals decision does not raise an issue of substantial public interest that needs to be determined by the Supreme Court.

VII. CONCLUSION

In PCC 19C.10.065(A), the County Council said what it wanted PALS staff to present to it so that it could make an informed decision. It is a process for the benefit of the Council. Through that process, the MCAC, Planning Commission, and Council all determined that the current and proposed land use designations were inappropriate, but that another designation, HRD, was consistent with the Comprehensive Plan and the GMA. The Board, Superior Court, and Court of Appeals all determined that the process and outcome in this case was proper.

Summit-Waller has failed to meet its burden under RAP 13.4(b). The Court of Appeals decision does not conflict with any Supreme Court cases and the fact that Summit-Waller did not like the format of PALS staff report does not raise on issue of substantial public interest. The Court should deny Summit-Waller's Petition for Review.

Dated this 14th day of June, 2019.

Respectfully submitted,

GORDON THOMAS HONEYWELL LLP

By _____

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DECLARATION OF SERVICE

I, Lisa Blakeney, declare under the penalty of perjury of the laws of the State of Washington, that the following facts are true and correct:

I am a legal assistant in the offices of Gordon Thomas Honeywell LLP, attorneys for the Intervenors Apogee Capital, LLC and High Valley Investment, L.L.C. on the 14th day of June, 2019, I caused a copy of the following documents to be served upon all parties herein, as indicated below:

Brief of Respondents

Party/Attorney	Method of Service
Daniel Haire 11012 Canyon Road East, #8-179 Puyallup, WA 98373 Hairedan@comcast.net Counsel for Summit-Waller Community Association and North Clover Creek Community Council	[ ] Via Legal Messenger [X] Via U.S. Mail [ ] Via E-filing Notification [X] Via Email
Todd Campbell Deputy Prosecuting Attorney Pierce County Prosecutor's Office – Civil Division 955 Tacoma Avenue South, Suite 301 Tacoma, WA 98402 tcampbe@co.pierce.wa.us Counsel for Pierce County	[ ] Via Legal Messenger [X] Via U.S. Mail [ ] Via E-filing Notification [X] Via Email

Dated at Tacoma, Washington this 14th day of June, 2019.

Lisa Blakeney, Legal Assistant
Gordon Thomas Honeywell LLP

GORDON THOMAS HONEYWELL LLP

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