NO. 99564-8

**SUPREME COURT OF THE STATE OF WASHINGTON**

AJI P., et al.,

Petitioners,

v.

STATE OF WASHINGTON, et al.,

Respondents.

# STATE OF WASHINGTON'S ANSWER TO AMICUS CURIAE BRIEFS

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## I. INTRODUCTION

Climate change is among the most pressing and complex challenges facing humanity. The range of amici show how climate change affects broad interests, from environmental groups and tribes to faith groups and the children of Washington State. With the participation of these groups, and many other impacted stakeholders, Washington's political branches are actively taking significant steps to address this critical and complex threat. While amici have legitimate and powerful perspectives that deserve the attention of the political branches, amici do not establish a basis for this Court to grant review.

Amici largely agree that the Court of Appeals applied the correct legal standards. But, amici challenge the manner in which the Court of Appeals applied those well-established standards. Amici's arguments, however, are based on a mischaracterization of Petitioners' claims and a misunderstanding of the inherently legislative remedy for those claims. Contrary to amici's characterization, Petitioners do not challenge affirmative emissions by the State government; instead their claims are almost exclusively that the State government has not done enough to regulate third-party conduct.

While amici, like Petitioners, characterize the State's role as "affirmative," applying that label does not make it so. The relief advocated

by amici and Petitioners inevitably requires difficult choices about how to regulate third-party conduct and how to spend public resources, on topics ranging from emissions limitations to transportation spending. These sorts of decisions are the province of the political branches, which are better situated to receive input from, and balance the interests of, all stakeholders. The Court of Appeals properly determined that these claims do not raise issues appropriate for judicial resolution under established separation of powers and political question doctrine principles.

Further, amici's citation to foreign climate decisions does not address the separation of powers issues under the Washington State Constitution that control in this case. Nor do amici's repetition of Petitioners' arguments for the Court to declare a new fundamental constitutional environmental right weaken the sound analysis of the Court of Appeals.

Importantly, the Court of Appeals decision is narrowly tied to the extraordinary nature of the claims in this case and the fundamentally legislative relief sought by Petitioners. Amici—like Petitioners—remain free to challenge specific affirmative governmental actions, such as the adoption of legislation, and to utilize statutory mechanisms under the State Environmental Policy Act and Clean Air Act to challenge proposed actions or permits based on their environmental impacts. The Court of

Appeals decision simply rejects Petitioners' effort to have the judiciary make the initial policy judgments inherent in setting the state's response to the climate crisis. This Court should decline discretionary review.

## II. ARGUMENT

The five amicus briefs submitted to this Court reflect the widespread interest in moving action on climate change urgently forward. The State shares this interest, but does not agree that this case is the appropriate legal vehicle for doing so. As set forth below, amici's arguments misunderstand the particular claims and circumstances of this case, cite foreign decisions without any comparative constitutional analysis, and reiterate Petitioners' argument for a new fundamental right to a healthful environment. But amici provide nothing to show that the Court of Appeals decision is unsound or merits review.

### A. Amici's Mischaracterization of Petitioners' Claims Cannot Overcome the Justiciability Issues at the Heart of This Case

In search of claims that could be justiciable, amici follow Petitioners' lead and mischaracterize the actual legal claims at issue in two major ways.

First, multiple amici misconstrue Petitioners' case as attempting to enforce the state's statutory greenhouse gas reduction schedule, RCW 70A.45. Amicus Curiae Brief of League of Women Voters of Washington (League Br.) at 6, 8–10; Environmental Law Alliance

Worldwide-US (ELAW-US Br.) at 2. But Petitioners have *never* made a legal claim in this case to enforce the statutory greenhouse gas reduction limits. CP 56–72 (Petitioners' six claims for relief). In fact, Petitioners' Complaint for Declaratory & Injunctive Relief sought to invalidate an earlier version of that statute before Petitioners withdrew that claim altogether. CP 67–69 (Sixth Claim for Relief). *See* State's Answer in Opposition to Petition for Discretionary Review (Answer to Pet.) at 9–10. Enforcement of RCW 70A.45 is not before this Court, and neither Petitioners nor amici can amend the Complaint through briefing. *Southern Walk at Broadlands Homeowner's Ass'n v. OpenBand at Broadlands, LLC*, 713 F.3d 175, 184 (4th Cir. 2013).

Second, amici's justiciability arguments are based on a fundamental misconception that Petitioners' claims would not require any new legislation as a remedy. League Br. at 3–4; Brief of Amici Curiae Environmental Groups (Envtl. Groups Br.) at 4–5. These arguments appear to be based on the mistaken assumption that the named state agencies and officials already have statutory authority to impose whatever greenhouse gas emissions reduction regulations they see fit under the greenhouse gas reductions schedule of RCW 70A.45, or under the general policy to protect the environment from the State Environmental Policy Act and other statutes. However, while these authorities provide key general

goals and benchmarks, none of the authorities provide the kind of specific legislative authorization that is necessary for the executive branch to comprehensively regulate greenhouse gases.[1] *See* State's Answer to Pet. at 8–9, 11–12.

A case in point is the Department of Ecology's recent effort to develop a Clean Air Rule in order to provide comprehensive regulation of the most significant sources of greenhouse gases in this state. Upon review, this Court held that the portions of the rule that regulated major but indirect sources of greenhouse gases exceeded Ecology's statutory authority under the Clean Air Act. *Assoc. of Wash. Bus. v. Dep't of Ecology,* 195 Wn.2d 1, 14–17, 455 P.3d 1126 (2020). As the Court of Appeals correctly recognized, new legislation would be required to implement the aggressive "climate recovery plan" sought by Petitioners. *Aji P. v. State*, 16 Wn. App. 2d 177, 189, 480 P.3d 438 (2021).

Amici also argue that because the Petitioners purport to challenge "affirmative" State conduct, no new legislation is needed for the Court to order the State to cease that conduct. League Br. at 4. But this label is

[1] As described in the State's Answer to Petition, significant legislation was passed in recent legislative sessions to provide a statutory framework for specific emissions reductions regimes to address different emissions sectors, including the Climate Commitment Act, the Clean Fuels Standard, and limitations on hydrofluorocarbons. *See* State's Answer to Pet. at 3–4. These are the kinds of fundamentally legislative actions needed to set the state's climate policy in each of these areas in the first instance.

inaccurate. Amici, like Petitioners, do not directly challenge emissions by the State government. Rather, the vast bulk of greenhouse gas emissions that Petitioners and amici seek to prevent result from third-party activity. Amici's and Petitioners' fundamental argument—as reflected in the allegations in Petitioners' Complaint—is that the State has not done enough to regulate emissions statewide. *See, e.g.*, CP 45–46 (identifying failure to impose greater limits on burning of coal); *id.* at 46 (identifying failure of "energy sector . . . to meet the state's greenhouse gas reduction requirements"); *id.* at 46–47 (identifying that Ecology "has taken no further administrative actions designed to reduce carbon dioxide emissions in the state of Washington"). Neither amici nor Petitioners argue that direct emissions by the State government itself result in constitutional violations.

Despite artful drafting, amici and Petitioners fundamentally complain that the State has not done enough to regulate greenhouse gas emissions. The proposed remedy, unsurprisingly, would necessarily involve extensive new regulatory schemes that would need to be enacted through legislation. And that is what distinguishes this case from almost every other lawsuit against the government, in which the remedy is an order directing the government to desist from its unconstitutional conduct.

The remedy sought here would require something different in kind—additional environmental legislation regulating third-party conduct.

Moreover, amici's fundamental misconceptions of this case lead directly to their mistaken understanding of the Court of Appeals' application of the political question doctrine. For example, under the second of the four political question doctrine factors under *Baker v. Carr*, 369 U.S. 186, 82 S. Ct. 691, 7 L. Ed. 2d 663 (1962), the League argues that the Court of Appeals "overlooked" the judicially manageable standard provided by the greenhouse gas reduction schedule of RCW 70A.45, which the League argues a court could look to as a measure for the constitutionality of the State's conduct. League Br. at 9–10. But, as described above, Petitioners never sought to enforce this statute, and have withdrawn their claims related to RCW 70A.45.

Similarly, the League mistakes the statutory greenhouse gas reduction schedule under RCW 70A.45 for the relevant policy determination under the third *Baker* factor. League Br. at 8. Rather, the "initial policy determination" under *Baker* is the pace, extent, and method by which to achieve the emissions reductions in each of the many sectors of the economy that contribute to emissions. *Baker*, 369 U.S. at 217. Petitioners seek to have the Court set the State's policy on this in the first instance, inconsistent with *Baker*. Indeed, this kind of sector-by-sector

policymaking is exactly what the Legislature and implementing agencies have steadily been accomplishing, setting out detailed statutory regulatory regimes for different emissions sectors. *See* State's Answer to Pet. at 2–4; CP 97–100 (Defendants' Answer to Plaintiffs' Complaint for Declaratory & Injunctive Relief).

The League's misconceptions continue under the first and fourth *Baker* factors. Here the League ignores the fact that complex policy-making legislation would be needed to even begin to redress Petitioners' claims. League Br. at 5–9. By ordering and reviewing such legislation for compliance with a court-created standard, the judiciary would impermissibly step into the textually committed role of the political branches and improperly police their policy-making role under the Washington State Constitution. *See Aji P.*, 16 Wn. App. 2d at 189, 191.

In a typical case, amici are quite right that article II, section 1 is not a textual commitment that generally precludes judicial review. *See* Memorandum of Amici Curiae Fred T. Korematsu Center for Law and Equality, et al. (Race and Law Ctrs. Br.) at 4–5. But the Court of Appeals correctly recognized that this is not a typical case. Petitioners ask the judiciary for relief that will, if granted, inevitably result in the judicial branch making a plethora of legislative policy decisions about the pace,

extent, and method by which to achieve the emissions reductions in each of the many sectors of the economy.

Amici Race and Law Centers' attempt to draw a parallel between this case and *Brown v. Board of Education*, 347 U.S. 483, 74 S. Ct. 686, 98 L. Ed. 873 (1954), is flawed. In *Brown*, the Supreme Court held that state and local laws that excluded students from public schools violated the Equal Protection Clause. *Id*. at 493. In subsequent cases, courts adopted remedies to compel state and local governments to cease discriminating in public education on the basis of race. *E.g.*, *Brown v. Bd. of Educ.*, 349 U.S. 294, 299–301, 75 S. Ct. 753, 99 L. Ed. 1083 (1955). Relief for the claims in this case, however, is quite different. Petitioners here do not seek to compel the State to cease emissions; they seek to have the judiciary compel adoption and enforcement of environmental regulations to limit third-party emissions statewide.

Amici Race and Law Centers are absolutely right that the fact that the relief requested is complex or difficult to implement does not, standing alone, make a case nonjusticiable. Race and Law Ctrs. Br. at 1–2, 10. It is the legislative nature of the relief sought that makes this case nonjusticiable. Amici Race and Law Centers do not meaningfully address the unique separation of powers issues implicated by the claims in this case.

While amici might wish that Petitioners had pled different claims, such as challenging specific affirmative acts by the State or alleging statutory violations that could be meaningfully enforced through declaratory judgment and injunctive relief, such claims are not at issue in this case. *See* State's Answer to Pet. at 7–18. The Court of Appeals' conclusion that Petitioners' extraordinary claims are nonjusticiable under established case law does not warrant review.

### B. Foreign Climate Decisions Made Under Fundamentally Different Separation of Powers Frameworks Do Not Translate To the Specific Issues in This Case

Amici's arguments in support of review based on foreign decisions are critically flawed because they provide no comparative constitutional analysis to show why the approach to separation of powers and positive rights in these foreign jurisdictions should be persuasive to this Court's analysis under the Washington State Constitution. *See* Envtl. Groups Br. at 9; ELAW-US Br. at 2–3, 7–8. Indeed, the cited decisions arise under fundamentally different constitutional structures, with different roles for the judiciary, and different approaches to constitutional rights that render them unpersuasive here. *See Printz v. United States*, 521 U.S. 898, 921 n.11, 117 S. Ct. 2365, 138 L. Ed. 2d 914 (1997).

Amici fail to acknowledge or analyze the vital differences in these foreign constitutional systems on separation of powers, the role and

function of the judiciary, and the availability of legal remedies—all fundamental differences that bear directly on the issues in this case. Judicial systems around the world based on the European model, rather than the American common law system, employ specialized constitutional courts designed specifically to resolve major public policy issues. Gustavo Fernandes de Andrade, *Comparative Constitutional Law: Judicial Review*, 3 U. Pa. J. Const. L. 977, 979–80 (2001). These more overtly political courts review constitutional issues in the *abstract*, rather than as they arise from concrete disputes. *Id.* at 981. Such courts regularly issue very prescriptive decisions, such as outlining how an unconstitutional statute can be redrafted into constitutionality, or even providing draft statutory language that the judges say they would find constitutional. *Id.*; Martin Shapiro & Alec Stone, *The New Constitutional Politics of Europe*, 26 Comp. Pol. Stud. 397, 404 (1994). Whatever the merits of these constitutional systems, the Washington State Constitution embodies a very different understanding of the relationships between branches of government.

A prime example of the different roles and remedies available to different kinds of courts internationally is the famous abortion decision of the German Constitutional Court in the 1970s. In this decision, the specialized constitutional court not only invalidated a statue that

liberalized abortion policy in West Germany, but went on to expressly direct and require the German Parliament to pass a statute making abortion a crime. German abortion decision, 39 Entscheidungen des Bundesverfassungsgerichts [BVerfGE] [Federal Constitutional Court] 1 (1975), *translated in* 9 J. Marshall, *Journal of Practice and Procedure* 605 (1976) (available at: https://heinonline.org/HOL/Page?collection=usjournals&handle=hein.journals/jmlr9&id=615&men_tab=srchresults); *see also Comparative Constitutional Law: Judicial Review*, *supra,* at 981. Such a result is not possible under our system with its separation of powers restraints and prudential doctrines.

Separation of powers itself is much less distinct in many other constitutional and governmental frameworks. Significantly, the parliamentary system of government common throughout Europe and beyond, merges significant executive and legislative power in the single office of the prime minister. *Comparative Constitutional Law: Judicial Review*, *supra,* at 984.

Moreover, while many foreign constitutions expressly embrace positive rights, it is well established that, with limited exceptions not applicable here, the Washington and United States Constitutions do not. *McCleary v. State*, 173 Wn.2d 477, 518, 269 P.3d 227 (2012); Ran Hirschl, *"Negative" Rights vs. "Positive" Entitlements: A Comparative*

*Study of Judicial Interpretations of Rights in an Emerging Neo-Liberal Economic Order*, 22 Hum. Rts. Q. 1060, 1095–96 (2000) (available online at: https://heinonline.org/HOL/Page?handle=hein.journals/hurq22&div=48&g_sent=1&casa_token=&collection=journals). In *McCleary*, this Court observed that our own constitutional rights are primarily negative in nature, and "the role of the court is to police the outer limits of government power, relying on the constitutional enumeration of negative rights to set the boundaries." *McCleary*, 173 Wn.2d at 518 (citing Helen Hershkoff, *Positive Rights and State Constitutions: The Limits of Federal Rationality Review,* 112 Harv. L. Rev. 1131, 1137 (1999)).[2]

Given these key differences in foreign constitutional and judicial frameworks on the specific issues in this case, the foreign cases advanced by amici provide little assistance to the Court. For example, the German and Dutch cases cited by ELAW-US are based on specific positive rights established under their laws and constitutions and arise from judicial systems that allow their courts to impose more detailed remedies on the political branches. *Neubauer v. Germany*, BVerfG, Beschluss des Ersten

[2] The *McCleary* decision itself dealt with an exception to the negative nature of most constitutional rights due to the expressly *positive* constitutional right related to education in the Washington State Constitution: the "*paramount duty* of the state to make ample provision for the education of all children . . . ." Const. art. IX, § 1 (emphasis added); *McCleary*, 173 Wn.2d at 483, 514, 518–19. *See* State's Answer to Pet. at 10–11, 15.

Senats vom 24. März 2021 - 1 BvR 2656/18 -, Rn. 1-270 [Order of the First Senate of 24 March 2021]; *The State of the Netherlands v. Urgenda Foundation,* H.R. 20 December 2019, No. 19/00135, ECLI:NL:HR:2029:2006.[3]

Furthermore, unlike the claims in the instant case, these foreign cases involved challenges to specific government actions as inadequate to reduce emissions pursuant to the positive governmental duties. *Id*. For example, in the Canadian case, the Ontario Superior Court of Justice distinguished the claims against concrete governmental action in that case—Ontario's revocation of its cap and trade emissions reduction statute—from generalized claims in other nonjusticiable Canadian cases where plaintiffs challenged the state's overall climate and housing policies and sought judicial imposition, in the first instance, of more aggressive standards. *Mathur v. Ontario,* 2020 ONSC 6918, ¶¶ 111-140 (Superior Ct. of Justice Ontario) (13 July 2020) (distinguishing *La Rose* (climate policy) and *Tanudjaja* (housing policy)).

The comparative constitutional context is critical to understanding the applicability of the foreign decisions offered by amici to the separation of powers and fundamental rights issues in this case. While the foreign climate decisions might make sense in different cases with different claims for a foreign judiciary operating under a different system of government,

[3] Electronic links to cited foreign materials provided as a courtesy to the Court by ELAW-US at: https://elaw.org/Government_Cases.

they do not translate well into our political and legal system or to the specific issues and claims in this case. They are therefore not persuasive on these issues compared with our traditions and precedent on separation of powers and the political question doctrine, as well as our established process for identifying and protecting constitutional rights.

### C. Arguments by Tribal Amici Were Properly Considered by the Court of Appeals[4]

The State agrees with amici Swinomish Indian Tribal Community, Suquamish Tribe, and Quinault Indian Nation (collectively Tribes) that Tribal values should be considered in a fundamental rights analysis, and respects and appreciates that climate change is a vitally important issue to amici Tribes, as it is to the State.

The Court of Appeals expressly considered amici Tribes' arguments. Nothing in the Court of Appeals decision suggests that its reference to "our Nation's history, legal traditions, and practices" and "our societal values" excluded native peoples. *Aji P.*, 16 Wn. App. 2d at 200 n.14 (quoting *Washington v. Glucksberg,* 521 U.S. 702, 710, 117 S. Ct. 2258, 138 L. Ed. 2d 772 (1997)), n.15. Tribes hold a special place in the constellation of governments within the United States, *see, e.g.*, *Michigan*

[4] Respondent Governor Inslee does not join subsections C or D of this brief, which deal with a fundamental constitutional right to a stable climate. In not joining these sections of the brief, the Governor chooses to rest on the strength of the preceding arguments, rendering it unnecessary to take a position on the constitutional issue raised by Petitioners.

*v. Bay Mills Indian Community*, 572 U.S. 782, 788–89, 134 S. Ct. 2024, 188 L. Ed. 2d 1071 (2014), and both tribes and native peoples are, of course, members of the society relevant to the due process inquiry. The Court of Appeals did not suggest otherwise.

Instead, the Court of Appeals held that looking to the overall historical tradition of constitutional environmental protection in our *collective* history—a history that includes the states and the tribes—Petitioners had not provided sufficient evidence of a deeply rooted fundamental right to a healthful environment. *Aji P.*, 16 Wn. App. 2d at 200–02. This was especially true in light of the Supreme Court's admonition that courts should be "reluctant to expand the concept of substantive due process because guideposts for responsible decisionmaking in this unchartered area are scarce and open-ended." *Glucksberg*, 521 U.S. at 720 (quoting *Collins v. City of Harker Heights*, 503 U.S. 115, 125, 112 S. Ct. 1061, 117 L. Ed. 2d 261 (1992)). While amici Tribes are correct that the substantive due process inquiry appropriately considers the history of tribes and native peoples in considering our Nation's history, legal traditions, and practices, amici Tribes do not identify any error by the Court of Appeals that warrants review.

## D. Amici's Fundamental Rights Argument is Unavailing[5]

Amici Environmental Groups argue that the Court should accept review to declare a new fundamental right to a healthful environment. But amici add nothing that shows that Petitioners can articulate a cognizable constitutional claim. Nor do amici reveal how this case could be an appropriate one in which to determine whether such an environmental right exists where a legally available remedy is lacking.

The Environmental Groups' primary argument is that the Court of Appeals did not properly consider legislative recognition of a right to a healthful environment in the policy statements of various statutes. Envtl. Groups Br. at 4–5. But, amici do not explain how the Court of Appeals erred when it relied on this Court's decision in *State v. Hand,* 192 Wn.2d 289, 302, 429 P.3d 502 (2018), to determine that the Legislature cannot create fundamental constitutional rights through unenforceable policy provisions in statutes. *See Aji P*, 16 Wn. App. 2d at 203; State's Answer to Pet. at 19. Nor do amici provide the kind of historical background that would be necessary to support recognition of such a right. *See Aji P*, 16 Wn. App. 2d at 202 (Petitioners "point to no legal or social history to support their asserted right").

[5] Respondent Governor Inslee does not join this subsection of this brief. *See, supra,* n.4.

Moreover, to allow a single legislative act to create constitutional rights would allow a particular Legislature, at one moment in time, through a simple majority, to bind future Legislatures with the force of a constitutional amendment in contravention of the well-established rule that a single Legislature cannot do this. *Wash. State Farm Bureau Fed'n v. Gregoire*, 162 Wn.2d 284, 290, 174 P.3d 1142 (2007) ("No legislature can enact a statute that prevents a future legislature from exercising its law-making power."). Amici do not identify an issue appropriate for review.

## III. CONCLUSION

The Court of Appeals appropriately applied established law in its decision finding Petitioners' claims nonjusticiable and lacking a basis in Washington law. Like Petitioners, amici do not identify any error in how the Court of Appeals articulated the applicable rules of law but, rather, take issue with the result. For the reasons outlined above, no issues raised

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by amici warrant review. The State therefore requests that the Court decline discretionary review.

RESPECTFULLY SUBMITTED this 16th day of August, 2021.

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**PROOF OF SERVICE**

I certify under penalty of perjury under the laws of the state of Washington that on August 16, 2021, I caused to be served the State of Washington's Answer to Amicus Curiae Briefs upon the parties herein via the Appellate Court Portal, and per the electronic service agreement.

DATED this 16th day of August 2021, at Olympia, Washington.

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