No. 1034342

SUPREME COURT
OF THE STATE OF WASHINGTON

VALLEY CITIES COUNSELING AND CONSULTATION,

Respondent,

v.

EZRA EDDINES,

Petitioner.

RESPONSE TO PETITIONER'S PETITION FOR REVIEW

By:

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1. IDENTITY OF RESPONDENT

Valley Cities Counseling and Consultation ("Valley"), is the Respondent in this matter.

2. ANSWER TO RESTATED ISSUES PRESENTED TO REVIEW

Whether ACC 5.23.070 is preempted by RCW 59.18.650(2)(j) where it erects procedural barriers to the degree that it categorically denies trial courts from having any authority to even hear an unlawful detainer matter based on that state law notice of termination, specifically codified a transitional housing provider's right to evict tenants that no longer qualify for transitional housing? Yes.

3. RESTATEMENT OF THE CASE

3.1. Ezra was no longer eligible to reside at Valley's transitional housing and was served a 60 day notice terminating his tenancy for good cause under RCW 59.18.650(b)(j). (CP at 3).

3.2. Valley filed an unlawful detainer action when Ezra

refused to vacate. (CP 1-4). During argument at a show cause hearing, Valley explained to the trial court that termination of the tenancy for good cause for a select group of landlords, *i.e.*, transitional housing providers, was prescribed by state law under RCW 59.18.650(2)(j). (CP at 9). The City of Auburn could not "block plaintiff" a member of this legislatively-selected small group of landlords from using the state-prescribed just cause law" to terminate a tenancy just because "there is no analog for RCW 59.18.650(2)(j) in . . . ACC 5.23.070." (CP at 9). *Burien* was cited as persuasive authority. (CP at 10). Valley also cited *Cannabis Action Coal v. City of Kent*, 183 Wn.2d 219, 227 (2015) for the uncontroversial rule of law that under conflict preemption, "a state law preempts a local ordinance when an ordinance permits what state law forbids or forbids what state law permits." (CP at 10).

3.3. The trial court commissioner found preemption applied but reserved the issue of possession. (CP 45). There was a lengthy revision hearing that nearly entirely entailed Ezra's

attorney and the learned trial court judge having a lengthy back and forth. (RP January 6, 2023). Ezra's attorney could not persuasively answer any of the trial court's questioning as to how preemption doctrine did not apply. (RP January 6, 2023). Valley, on the other hand, "ke[pt] it short", arguing four main points.

First, "Unlawful detainer is a creature of statute and 650 defines the grounds upon which the plaintiff can invoke the subject matter jurisdiction of the court." (RP January 6, 2023, at 56).

Second, "The legislature has chosen to select a narrow group of landlords, transitional housing landlords with the grounds upon which to invoke the subject matter jurisdiction of the courts in the state of Washington." (RP January 6, 2023, at 56).

Third, "Auburn actually deprives a subject matter jurisdictional grounds in the statutory proceeding expressly granted by the legislature." (RP January 6, 2023, at 56).

Last, "[T]herefore, it's going far beyond creating an

affirmative defense and the conflict should cause a preemption of Auburn's local ordinance. . . . that's just as simple as it really is." (RP January 6, 2023, at 56).

3.4. The trial court judge orally denied revision. (RP January 6, 2023). He orally reasoned, "here we have a state law that explicitly allows the eviction of a tenant for cause if the tenant continues in possession of a dwelling unit in transitional housing after having received at least 30 days advanced written notice. . . ." and "The tenant has aged out of the transitional housing program or the tenant has completed an educational or training or service program and is no longer eligible to participate in the transitional housing program." (RP January 6, 2023, at 29). The trial court judge concluded "that is an affirmative right that a landlord has statewide. . . ." (RP January 6, 2023, at 29). "Auburn in this case has taken away completely that right. . . ." and "haven't provided something else that they have to do like find them different housing that's not transitional housing. That would be analogous to the *Kennedy* case." (RP January 6, 2023,

at 29-30)

Additionally, the learned trial court judge mentioned policy reasons for the legislature creating a right for a select group of landlords, transitional housing providers, to evict disqualified tenants: (1) "What are you doing in transitional housing if you're no longer eligible?" (RP January 6, 2023, at 52); (2) " The word transitional means it is housing that is usually temporary to get someone off the streets into transitional housing with goals that they'll then move into permanent housing"; (3) "if we have transitional housing clogged up with people that are not moving on to permanent housing and instead just remain there despite no longer being eligible, it defeats the whole purpose of what transitional housing is"; and (4) "And that exacerbates our homeless problem and is crippling our region. It's horrific, right? We see it every day." (RP January 6, 2023, at 57). "[T]his is the state's way of helping to address that." (RP January 6, 2023, at 58).

3.5. On appeal, Division One affirmed the trial court,

holding that "[b]ecause [ACC 5.23.070.A] categorically forbids what state law permits, the superior court correctly concluded that the ordinance is preempted by state law." *Valley Cities Counseling & Consultation v. Eddines*, 84964-6-I, 2024 WL 3647937 (Wash. Ct. App. Aug. 5, 2024).

Division One reasoned that the "statutory scheme of the RLTA . . . provide[s] a right for landlords to evict tenants." *Id.* Further, "In 2021 . . . the Residential Landlord Tenant Act" was amended to allow "landlords to evict a tenant who continues in possession of a dwelling unit in transitional housing after having received at least 30 days' advance written notice to vacate . . . [when] the tenant has completed an educational or training or service program and is no longer eligible to participate in the transitional housing program." RCW 59.18.650(2)(j)." *Id.*

Thus, Auburn's previously enacted ACC 5.23.070.A was in direct conflict with RCW 59.18.650(2)(j) because the local ordinance categorically forbid eviction of a tenant based on "no longer [being] eligible to participate in [a] transitional housing

program." *Valley Cities Counseling & Consultation*, 84964-6-I, 2024 WL 3647937.

3.6. In his Petition for Review, Ezra argues this Court should grant review for the following reasons in pertinent part:

- Neither RCW 59.12.030 nor RCW 59.18.650 create an affirmative right to evict; therefore, local jurisdictions may prohibit evictions that are allowed under state law. (Petition for Review).

- "The Court of Appeals' holding conflicts with this Court's decision in *Kennedy*, creates confusion about the validity of many local ordinances and the extent to which local jurisdictions can regulate grounds for eviction, and unduly restricts the ability of local governments to legislate in response to local concerns." (Petition for Review at 3).

- Allowing local jurisdictions to "narrow permissible grounds for eviction" dictated by state law would provide "much-needed certainty to landlords, tenants, and local

lawmakers" and help "the growing affordable housing crisis." (Petition for Review).

4. ARGUMENT IN RESPONSE TO PETITION FOR REVIEW

4.1. Ezra Fails to Provide a Meritorious Basis Under RAP 13.4 for this Court to Accept Review.

A petition for review will be accepted by the Supreme Court *only*:

> (1) If the decision of the Court of Appeals is in conflict with a decision of the Supreme Court; or
>
> (2) If the decision of the Court of Appeals is in conflict with a published decision of the Court of Appeals; or
>
> (3) If a significant question of law under the Constitution of the State of Washington or of the United States is involved; or
>
> (4) If the petition involves an issue of substantial public interest that should be determined by the Supreme Court.

RAP 13.4 (emphasis added).

Here, Ezra fails to demonstrate any basis for this court to grant review. As explained below, Division One's decision does

not conflict with any case law, nor constitutional preemption doctrine, and it does not present any policy reason to grant review. Rather, accepting Ezra's arguments would completely eviscerate Washington State's Constitution's preemption clause to the point of no longer existing at all and being unrecognizable and unworkable in practice. *See* Wa. Const. art. XI, § 11.

4.2. This Court Should Deny Review Under RAP 13.4(1) as Ezra Cannot Demonstrate Any Conflict with Decisions of this Court.

"Any county, city, town or township may make and enforce within its limits all such local police, sanitary and other regulations as are not in conflict with general laws." Wa. Const. art. XI, § 11. "[A] state statute preempts an ordinance . . . if a conflict exists such that the statute and the ordinance may not be harmonized." *Lawson v. City of Pasco*, 168 Wn.2d 675, 679, 230 P.3d 1038 (2010). "[A] local ordinance may go further in its prohibition than state law" but may not "forbid[] what state law permits." *Rental Hous. Ass'n v. City of Seattle*, 22 Wn. App. 2d 426, 438-41 (2022); *Lawson*, 168 Wash.2d at 679; *Rabon v. City*

of Seattle, 135 Wash.2d 278, 293, 957 P.2d 621 (1998); *Rental Hous. Ass'n of Washington v. City of Burien*, 23 Wn. App. 2d 1015 (2022). A test derived from case law is whether state law grants an affirmative right to engage in the prohibited activity under local law. *See Emerald Enterprises, LLC v. Clark Cnty.*, 2 Wn. App. 2d 794, 805, 413 P.3d 92, 98 (2018). In other words, an ordinance is constitutionally invalid if it "directly and irreconcilably conflicts with the statute." *Brown v. City of Yakima*, 116 Wash.2d 556, 561, 807 P.2d 353 (1991).

"Protected property interests include all benefits to which there is a legitimate claim of entitlement." *Crescent Convalescent Ctr. v. DSHS*, 87 Wn. App. 353, 358-59, 942 P.2d 981, 983 (1997). "Statutes and regulations create protected interests when they contain 'substantive predicates' or particularized standards or criteria that guide the discretion of official decision makers and specific directives that mandate a specific outcome if the substantive predicates are present." *Id.*

Under RCW 59.18.650(2)(j), transitional housing

providers may terminate a transitional housing tenancy when "The tenant continues in possession of a dwelling unit in transitional housing after having received at least 30 days' advance written notice" and the tenant is "no longer eligible to participate in the transitional housing program."

Under ACC 5.23.070(E) "it shall be a defense to the action that there was no just cause for . . . eviction or termination" of tenancy unless the "just cause" is "provided in this section." The "section" referred to contains several causes for eviction and one glaring omission: A transitional housing landlord's cause for eviction based on transitional housing tenant no longer being eligible to participate in the transitional housing program.

Here, there is no way of interpreting ACC 5.23.070—prohibiting a landlord from ever evicting or terminating a tenancy with 30 days of notice because the tenant is no longer eligible to participate in the transitional housing program—so that it does not conflict with RCW 59.18.650(2)(j). This is because state law specifically and expressly provides the

affirmative right to transitional housing landlords to terminate a tenancy, and evict, a transitional tenant that is no longer eligible to participate in the transitional housing program while ACC 5.23.070 expressly prohibits that statutory right granted to landlords of transitional housing. *Compare* RCW 59.18.650(2)(j) *with* ACC 5.23.070; *see also Crescent Convalescent Ctr*., 87 Wn. App. 353, 358-59.

Ezra, citing *Kennedy*, argues that ACC 5.23.070 permissibly bars a transitional housing provider from bringing an eviction action based on RCW 59.18.650(2)(j) because "[t]he ordinance does not raise further procedural barriers between landlord and tenant" other than providing "another defense for the tenant." *Kennedy v. City of Seattle*, 94 Wn.2d 376, 617 P.2d 713 (1980). Similarly, Ezra asserts the same argument, citing *Birkenfeld*.

As a threshold matter, both of the ordinances in *Kennedy* and *Birkenfeld* were held unconstitutional, the former as a taking and the latter because it "transgresse[d] the constitutional limits

of the police power . . . because . . . it . . . would impose heavy burdens upon landlords. . . .” *Birkenfeld v. Berkeley*, 17 Cal. 3d 129, 136, (1976). A “heavy burden” is exactly what ACC 5.23.070 “impose[s]” on transitional housing providers. Regardless, *Kennedy* is distinguished because the ordinance at issue did not eliminate the cause of action for eviction based on the end of the lease term, it added additional requirements the landlord had to meet before termination could occur. Local law adding for cause requirements to a plain state law no-cause termination statute is not necessarily a preemption issue.

However, as is the case with ACC 5.23.070, an ordinance *completely eliminating* a specific state law for cause termination statute, benefiting a specific group of defined landlords, is the very definition of conflict preemption. This is especially true where the state law being eliminated has specific legislatively prescribed conditions precedent and grants specific rights to a narrow group of special purpose landlords that exist solely to help stabilize housing.

Birkenfeld is distinguishable for, among other, the same reasons. The ordinance at issue there did not entirely eliminate the cause of action for eviction based on the end of the lease term. It added the requirements that the tenant must not be in "good standing at the expiration of the tenancy unless the premises are to be withdrawn from the rental housing market or the landlord's offer of a renewal lease has been refused." *Id.* at 148. In other words, in *Birkenfeld* the cause of action for eviction under state law based on the end of the lease was not completely eliminated; the landlord could still end a tenancy based on the expiration of the lease if the unit was being taken off the market, the tenant refused to sign a new lease, or if the tenant was not in good standing.

Additionally, *Birkenfeld* held a pre-suit certificate requirement was preempted precisely because it "raise[d] procedural barriers between the landlord and the judicial proceeding" that landlords were entitled to under state law. *Birkenfeld*, 17 Cal. 3d at 151. ACC 5.23.070 creates the same

type of preempted procedural barrier because it does not recognize RCW 59.18.650(2)(j) as a landlord's key to the courthouse, just the same as the certificate requirement locked the door to the courthouse for Californian landlords.

Notably, Ezra acknowledges that under *Kennedy* a local ordinance creating "procedural barriers to unlawful detainer" is one tipping point between state law preempting a local ordinance or that ordinance merely creating an additional defense to being evicted. (Brief of Appellant at 25, 27) (stating "Just like the ordinance in *Kennedy*, ACC 5.23.070 narrows permissible grounds for eviction *without erecting procedural barriers* in an unlawful detainer proceeding") (emphasis added). As to procedural barriers, certainly, at one end of this spectrum an ordinance that essentially removes the trial court's statutory jurisdiction to hear an unlawful detainer matter based on RCW 59.18.650(2)(j) clearly crosses that threshold. *See Birkenfeld*, 17 Cal. 3d at 151 (holding pre-eviction certificate requirement from City Board prevented landlord from accessing court and

conflicted with state law summary eviction proceeding and was preempted). On the other hand, a local ordinance that adds minor requirements to a state law may be the other end of the spectrum. Arguable cases for preemption would include the addition of a registration requirement for landlord businesses or a delay in the enforcement of a writ.

With this spectrum and this case in mind, under Auburn's ordinance a transitional housing provider landlord cannot register with anyone, wait long enough, or jump through any other prescribed set of hoops to bring an eviction under RCW 59.18.650(2)(j). Instead, ACC 5.23.070 categorically denies bringing an eviction under RCW 59.18.650(2)(j) to a point where it categorically denies King County Superior Court from having the authority to hear the matter on the merits.

In *City of Seattle*, local ordinances created a winter eviction ban for low-income tenants and tenants in school or educators. 22 Wn. App. 2d at 439. In holding preemption did not apply, this Court found persuasive that cities were able to create

"additional affirmative defenses." *Id.* at 440. It held that "the[se] ordinances" that "do not erect new procedural barriers to unlawful detainer but merely determine[d] the timing of the issuance of writs of restitution" passed muster under preemption doctrine. *Id.* at 441.

Auburn's City Code 5.23.070 does not create an affirmative defense—or any other defense for that matter. Rather, it prohibits a very specific eviction right under RCW 59.18.650(2)(j) completely by eliminating it as basis for eviction and cause of action. The landlord not being able to evict under RCW 59.18.650(2)(j) is not a defense—it is literally the local law. There is no greater "procedural barrier" than a locality prohibiting a transitional housing provider from bringing an eviction action expressly allowed under RCW 59.18.650(2)(j).

Stated another way, affirmative defenses must generally be pled, otherwise they are waived. CR(8)(c). But under ACC 5.23.070, it is doubtful that a transitional housing provider with a tenancy from Auburn could obtain a default order for a writ if

the basis of eviction pled was RCW 59.18.650(2)(j) *unless the landlord argued, and the Court held, the ordinance was preempted*. *See Kaye v. Lowe's HIW, Inc.*, 158 Wn. App. 320, 326, 242 P.3d 27, 30 (2010) (holding "[e]ven after default it remains for the court to consider whether the unchallenged facts constitute a legitimate cause of action, since a party in default does not admit mere conclusions of law"). This reality demonstrates ACC 5.23.070's major "further procedural barrier" ACC 5.23.070 creates supporting preemption.

Thus, the major lynch pin to Ezra's Petition of demonstrating conflict being Division One's decision and a decision of this Court cannot be met. This Court has no reason to accept review and should deny it.

4.3. <u>This Court Should Deny Review Under RAP 13.4(2) as Ezra Cannot Demonstrate Any Conflict with Decisions of Division Courts of Appeal</u>.

Here, Ezra's Petition does not cite any court of appeals decisions, let alone in conflict with Division One's decision. Moreover, Valley's responsive brief on appeal thoroughly

addressed the fact that no lower court of appeals decisions support Ezra's appeal.

4.4. This Court Should Deny Review Under RAP 13.4(3) and (4) as Division One's Decision Does Create Any Constitutional Questions Nor Does It Raise any Issue of Substantial Public Interest that Need Be Reviewed By this Court.

As explained above, under preemption doctrine, an ordinance that removes the trial court's statutory authority to hear an unlawful detainer matter based on RCW 59.18.650(2)(j) clearly creates unconstitutional procedural barriers. *See Kennedy*, 94 Wn.2d at 384; *Birkenfeld*, 17 Cal. 3d at 151. On the other hand, a local ordinance that adds minor requirements to a state law such as mere registration requirements for a landlord business or adds a short delay to the enforcement of a writ may be constitutional when examined on a case-by-case basis. *See City of Seattle*, 22 Wn. App. 2d at 441; *Margola Associates v. City of Seattle*, 121 Wn.2d 625, 651, 854 P.2d 23, 38 (1993), *abrogated by Chong Yim v. City of Seattle*, 194 Wn.2d 651, 451 P.3d 675 (2019).

Here, under the guise of erroneously manufacturing a substantial policy issue with Division One's decision, Ezra advocates for the complete destruction of preemption doctrine to the degree that localities should be permitted to eliminate specific state laws created for the benefit of specific groups of landlords altogether. In his mind, a massive patchwork of local laws that conflict with state law (with no articulable legal standard as to when state law preempts local law), would "provide much-needed certainty" and "promot[] housing stability." (Petition at 2). Nothing could be further from the truth.

First, Washington's Constitution and preemption doctrine have existed since this State's founding for good reason. The state legislature sits atop the legislative hierarchy. This legislative body is constitutionally mandated to lead the charge when it comes to formulating complex, interconnected, law to address statewide issues such as the housing crisis. Localities, for the very reasons state law is debated and passed, are not constitutionally permitted to go rouge and ignore that state law.

Unsurprisingly, as to Auburn's ordinance, the trial court found it unconstitutional. Division One agreed. Now Ezra files this petition, but merely repeating bad arguments does not make them better. This Court should not take up any invitation to essentially amend Washington's constitution, and Wa. Const. art. XI, § 11, through judicial fiat. Rather, democracy and debate determine state law. Then local ordinances must fall inline. They may add some requirements to state law so long as it is in harmony with state law, but they cannot outright forbid what state law allows. Otherwise, correcting the housing crisis will be like steering the Titanic with an unwieldy rudder made of spaghetti; the state legislature would be unable to provide course direction on major issues if localities can completely ignore state law.

Second, similarly, the state legislature made a conscious choice to protect transitional housing providers as part of its plan to address housing problems. It did so by preventing the elimination of, and harm done to, transitional housing by

allowing such providers to evict persons that no longer qualify to reside in their units with 30 days of notice. *See* RCW 59.18.650(2)(j). If these important—statewide housing businesses—are not able to do so, then they lose funding and go out of business. *Purpose Built Families Found., Inc. v. McDonough*, 36 Vet. App. 345, 349 (2023), appeal dismissed, 2023-2383, 2023 WL 7101992 (Fed. Cir. Oct. 27, 2023); 2 C.F.R. § 200.339 (Remedies for noncompliance) (stating, "Federal awarding agency or pass-through entity may take one or more of the following actions. . . . (a) Temporarily withhold cash payments pending correction of the deficiency by the non-Federal entity or more severe enforcement action by the Federal awarding agency or pass-through entity. (b) Disallow (that is, deny both use of funds and any applicable matching credit for) all or part of the cost of the activity or action not in compliance. (c) Wholly or partly suspend or terminate the Federal award. (d) Initiate suspension or debarment proceedings. . . . (e) Withhold further Federal awards for the project or program. . . ."); 2 C.F.R.

§§ 200.340 (Termination) through 200.343 (Effects of suspension and termination) (providing failure to comply with the provisions of a DOC award may adversely impact the availability of funding under other active DOC or Federal awards and may also have a negative impact on a non-Federal entity's eligibility for future DOC or Federal awards). The intent and purpose of state law would then be directly thwarted.

In other words, the argument that landlords do not have a right to evict tenants that no longer qualify for transitional housing, under RCW 59.18.650(2)(j), is terrible. Not only do such landlords have a specifically prescribed and codified right to do so, but as Division One held "the overall statutory scheme" (not to mention the constitutional right to exclude others from your property) recognizes such right:

> It is unlawful for the tenant to hold over in the premises or exclude the landlord therefrom after the termination of the rental agreement except under a valid court order so authorizing. Any landlord so deprived of possession of premises in violation of this section may recover possession of the property and damages sustained by him or her.

RCW 59.18.290(2).

> A landlord may not evict a tenant, refuse to continue a tenancy, or end a periodic tenancy except for the causes enumerated in subsection (2).

RCW 59.18.650(1)(a).

> The following reasons listed in this subsection constitute cause pursuant to subsection (2). . . .

RCW 59.18.650(2).

> The tenant continues in possession of a dwelling unit in transitional housing after having received at least 30 days' advance written notice to vacate in advance of the expiration of the transitional housing program, the tenant has aged out of the transitional housing program, or the tenant has completed an educational or training or service program and is no longer eligible to participate in the transitional housing program.

RCW 59.18.650(2)(j); *see also Crescent Convalescent Ctr.*, 87 Wn. App. at 358-59; 2 C.F.R. §§ 200.340 through 200.343.

Third, Ezra cites a list of local ordinances that he argues are in jeopardy because of the decision. He cites local ordinances from Seattle to Tacoma. The problem for Ezra is that Division One's decision was not groundbreaking nor controversial. It did

not espouse anything new, nor expansive, regarding preemption doctrine; the rule of law Division One espoused and applied is uncontroversial: an unconstitutional "conflict exists" if the ordinance "forbids what state law permits" and the "statute and the ordinance may not be harmonized." Thus, to the degree the other local ordinances cited by Ezra—not at issue nor briefed in this matter—do or do not pass that uncontroversial test is unaffected by Division One's decision in the case at hand. Those cases can be heard if a controversy arises, but this case has no impact on them because it says nothing new.

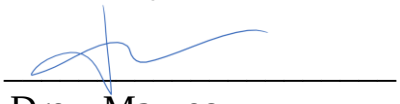
On the other hand, what was lawbreaking, controversial, unconstitutional was the City of Auburn not updating its local eviction law after the passage of RCW 59.18.650 to allow eviction of tenants no longer qualifying for transitional housing. That is why this case was published. Not because some new far-reaching rule of law being established. Rather, called upon to review a specific ordinance under preemption doctrine, and after looking at the statutory scheme as a whole, Division One

correctly held state law provided that specific right and correctly held Auburn's ordinance did not allow such right in any way shape or form. Transitional housing providers in Auburn cannot jump through any additional hoops or wait any additional amount of time to evict a tenant from transitional housing when he or she no longer qualified to reside there. By not being able to do so, the very existence of, and funding for, such transitional housing was jeopardized. Thus, ACC 5.23.070 could not be harmonized with state law and was preempted.

5. CONCLUSION

Pursuant to RAP 13.4, Valley respectfully requests this Court deny review, for the reasons stated herein.

Respectfully submitted this 21st day of October, 2024,



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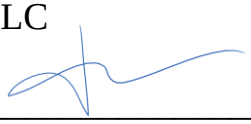

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