

BEFORE THE HEARING EXAMINER
CITY OF SEATTLE

In the Matter of the Appeals of:) Hearing Examiner Files:
) **W-17-002 and W-17-003 (consolidated)**
)
621 APARTMENTS LLCS, AND SEATTLE)
SHORT TERM RENTAL ALLIANCE, SEA)
TO SKY RENTALS AND MICHELLE) CITY OF SEATTLE'S MOTION TO
ACQUAVELLA.) DISMISS
)
from a Determination of Non-Significance for)
Land Use Code and Licensing Code Text)
Amendments Related to Short Term Rentals.)

I. INTRODUCTION AND RELIEF REQUESTED

Respondent City of Seattle ("City") respectfully moves the Hearing Examiner to dismiss the Appellants of both (now consolidated) appeals. Appellant 621 Apartments LLC, Roy Street Commons LLC, Eric and Amy Friedland, Raissa Lyles ("621") include owners and managers of short-term residential units, and a renter of short-term rental units. Appellant Seattle Short-term Rental Alliance ("SSTA") includes Sea to Sky Rentals and Michelle Acquavella, who are also owners and managers of short-term residential units and who "live or work near short term rental property". Appellants SSTR and 621 (hereafter "Alliance") failed to allege facts that establish standing to bring an appeal before the Hearing Examiner under the State Environmental Policy Act ("SEPA"). Both Appeals lack any statement establishing an immediate, concrete and specific injury to Appellants. Rather, Appellants allege only hypothetical and speculative harm based

1 economic loss, which is not an element of the environment and is not within the zone of interests
2 that must be considered under SEPA.

3 II. STATEMENT OF FACTS

4 a. The proposed legislation.

5 The City is proposing to amend the Land Use and Licensing Codes to create a new type of
6 land use ("short term rental") with land use and licensing standards for such use ("proposal").¹
7 No specific regulations exist in the Code for short-term rental properties; these short-term rentals
8 ("STR"), which are largely commercial and have been called the "Savvy traveler's hotel
9 alternative"², have historically been treated as a residential use.³ The proposal would address this
10 gap in the Code by establishing regulations for the growing short-term rental market in the City.

11 The proposal allows for continued short-term rental of a primary residence and one
12 secondary home per owner.⁴ For those that own more than two homes in Seattle and want to
13 continue short-term rentals, the proposal includes a one-year grace period before short-term rentals
14 must cease.⁵ The proposal contains many significant exemptions. First, the proposal only applies
15 to short-term rentals, defined as rentals that last less than 30 days.⁶ A property owner is not subject
16 to these regulations if he or she rents a residential unit for 30 days or more. A month to month
17 rental arrangement would not be subject to the short-term rental regulations. Second, the proposal
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19 ¹ See Exhibit A to Pennucci Declaration (Notice of Amendments).

20 ² See Exhibit B to Pennucci Declaration (print-out from sea to sky rentals website. The website goes on to state "For
better product, you pay the same or less- what's not to like?")

21 ³ See City of Seattle Analysis and Decision of the Director of the Seattle Department of Construction and Inspection
(April 24, 2017).

22 ⁴ See p. 7, lines 17-22 of Exhibit C2 to Pennucci Decl. (Short-Term Rentals-Licensing Amendments).

23 ⁵ See e.g., p. 4, lines 10-13 of Exhibit C1 to Pennucci Decl. (Short-Term Rentals-Land Use Code (LUC)).

⁶ See p. 10 of Exhibit C2 to Pennucci Decl. (Section 6, amending SMC 23.84A.024, to include the following definition:
"Short-term rental" means a lodging use, that is not a hotel or motel, in which a dwelling unit or portion thereof is
provided to guests by a short-term rental operator for a fee for fewer than 30 consecutive nights. A dwelling unit or
portion thereof that is used by the same individual or individuals for 30 or more consecutive nights is not a short-term
rental.")

1 does not apply to any short-term rentals in Downtown Seattle, South Lake Union or the Uptown
2 (Queen Anne) neighborhoods.⁷

3 The City prepared a Policy Report⁸ and webpage⁹ to analyze the proposed Legislation as
4 well as the SEPA checklist and Determination of Non-Significant ("DNS"). As noted in the DNS,
5 approximately eighty percent of the short-term rental units offered for nightly or weekly rentals
6 could meet the requirements proposed in the Legislation, and could continue to operate at their
7 existing activity levels based on available information.¹⁰

8 **b. SEPA analysis and Appeal.**

9 On April 24, the City issued a DNS for the Legislation.¹¹ Two appeals of the DNS were
10 filed with the Examiner.¹² One was filed by Courtney Kaylor on behalf of the SS TRA.¹³ The
11 second was filed by Ms. Courtney Kaylor on behalf of 621.¹⁴ The Deputy Hearing Examiner
12 consolidated the appeals.¹⁵ Each notice of appeal incorporates its comment letter sent to the City
13 during the SEPA comment period.¹⁶ In the almost-identical comment letters, Ms. Kaylor alleges
14 that the City failed to comply with the requirements of SEPA:

- 15 • The proposal description is inadequate;
- 16 • The proposal is based on inadequate or incorrect information;
- 17 • The proposal will result in significant adverse impacts to the build
environment, land use, housing, aesthetics, and transportation in the

18 ⁷ See p. 8 of Exhibit C2 to Pennucci Decl. (Licensing Ordinance).

19 ⁸ Exhibit D to Pennucci Decl. (City Report on Short-Term Rental Industry and proposed Regulations.)

20 ⁹ <https://www.seattle.gov/council/issues/regulating-short-term-rentals>. Here it states again "Approximately 80 percent
of existing short-term rentals in Seattle will see no new regulations."

21 ¹⁰ P. 6 of Exhibit E to Pennucci Decl. (DNS, which provides "Based on information pulled from the online platform
Airbnb in January 2017, around 80% of the units currently offered for nightly or weekly rentals through their
website would be able to meet the requirements proposed for short-term rentals, and could be able to continue to
operate at their current activity levels.")

22 ¹¹ Exhibit E to Pennucci Decl. (Determination of Non-Significance or DNS).

23 ¹² Notices of Appeal, on file with the Hearing Examiner.

¹³ *Id.*

¹⁴ *Id.*

¹⁵ Consolidation Letter, on file the Hearing Examiner.

¹⁶ See Notices of Appeal, on file with the Examiner.

1 affected areas.¹⁷

2 **c. Appellants' Interests in the Proposal and Alleged Injury**

3 SSTRRA alleges its members own, manage and live or work near short term rental.¹⁸ 621
4 alleges its members own and manage an apartment building containing short term rentals and Raisa
5 Renee Lyles is a regular tenant of short-term rental units in the City.¹⁹ The Appellants can be
6 broken down into four subsets, including those who (1) own, (2) manage, (3) use short-term rental
7 properties, or (4) "work and live near" a short-term rental property. Both Appellants allege the
8 exact same interest:

9 The proposed Land Use Code and Licensing Code Text Amendments Related to
10 Short Term Rentals and Bed and Breakfast Uses will prohibit or limit short term
11 rentals. This will reduce housing maintenance, encourage neglect or demolition
12 rather than renovation of existing housing, remove housing from the short and long
13 term rental market, reduce housing affordability, reduce the availability of housing
for some segments of the population, impact historic structures and increase traffic.
These are significant adverse impacts to the built environment, including housing
and aesthetics, relationship to existing land use plans, and policies, and to
transportation. These impacts will harm Appellants.²⁰

14 **III. ISSUES**

15 A. To meet SEPA standing, Appellants interests must be within the zone of
16 interests addressed by SEPA. Economic interests including loss of revenue
17 is not an element of the environment that must be considered under SEPA.
Appellants assert the proposed legislation will cause a loss of income from
18 a reduction in the number of short-term rental units. Must this appeal be
dismissed where Appellants' interests are economic?

19 ¹⁷ See Comment Letter, incorporated in Appellants' Notice of Appeal and on file with the Hearing Examiner.

20 ¹⁸ SSTRRA Appeal Form provides "SSTRRA is a Washington nonprofit corporation that supports short-term rentals in
21 the City of Seattle. SSTRRA's members own short term rental property, manage short term rental property, use short
term rental property, and live or work near short term rental property. Michelle Acquavella is an individual who owns
and manages short term rental property. Sea to Sky Rentals LLC is a Washington limited liability company. Michelle
Acquavella is its managing member. She and its employees and contractors own or manages short term rental
property."

22 ¹⁹ 621 Appeal Form includes 621 Apartments LLC, Roy Street Commons LLC and its members own and manage an
23 apartment building containing short term rental units in the City of Seattle. Eric Friedland is a member of 621
Apartments LLC and Roy Street Commons LLC and Amy Friedland is his spouse.

²⁰ See Notices of Appeal.

1 B. To meet SEPA standing, Appellants must show an immediate, concrete, and
2 specific injury, not a speculative or hypothetical injury. Appellants assert
3 the proposed legislation will cause loss of revenue due to a reduction in
4 short-term rental units, which will result in reduced maintenance of the
5 units, affecting housing aesthetics and resulting in blight. Must this appeal
6 be dismissed where Appellants fail to establish concrete and specific injury,
7 and rely on speculative injury?

8 IV. EVIDENCE RELIED UPON

9 This motion relies on the Declaration of Aly Pennucci and supporting papers, and papers
10 on file with the Examiner for this action.

11 V. ANALYSIS

12 An appeal may be dismissed without a hearing if the Examiner determines it fails to state
13 a claim for which the Examiner has jurisdiction to grant relief, or is without merit, frivolous, or
14 brought merely to secure delay.²¹ Further, a Notice of Appeal must include "specific objections"
15 to the decision.²²

16 A. Appellants fail to establish standing under the two-prong SEPA standing Test.

17 The Examiner should dismiss the Coalition's entire appeal for lack of standing. Although
18 a DNS is subject to appeal "by any interested person,"²³ that person must also establish standing.
19 As the Examiner has stated:

20 The courts have established a two-part test for SEPA standing: the
21 interest sought to be protected must arguably be within the *zone of*
22 *interest* to be protected or regulated by the statute; and the petition
23 *must allege an "injury in fact;"* Trepainer v. City of Everett, 64 Wn.
App. 380, 382, 824 P.2d 524 (1992), *rev. denied*, 119 Wn.2d 1012
(1992). The Court in Trepainer also stated that when a person alleges
a "threatened injury, as opposed to an existing injury, he or she must
show an immediate, concrete and specific injury to him or herself.

²¹ Hearing Examiner Rule (HER) 3.2.

²² HER 3.01(d) (3).

²³ SMC 25.05.680.B.1.

1 If the injury is merely conjectural or hypothetical there can be no
2 standing.” 64 Wn. App at 383 (citations omitted).²⁴

3 Based on the stated interest in both Notices of Appeal, Appellants fail to establish standing
4 under this test.

5 **1. Appellants economic interests are not within the zone of interest to be
6 protected under SEPA.**

7 The Examiner has recognized that economic impacts of actions are not included as an
8 element of the environment and therefore not within the zone of interest addressed by SEPA.²⁵

9 Here, Appellants fails to establish standing under the first prong of the standing test -that its alleged
10 injuries are within the zone of interest protected by SEPA. In *Snohomish County Property Rights*
11 *Alliance v. Snohomish County*, the court held that citizens lacked standing because they lacked
12 sufficient proof they would suffer specific injury and their injuries asserted were economic, which
13 are not within the zone of interests protected by SEPA.²⁶

14 Similarly, in *Harris v. Pierce County*, the court denied standing where the Petitioner’s
15 interest alleged- owning property that could be condemned- because such injury was economic
16 and not within the zone of interest protected by SEPA.²⁷ There was no showing of sufficient
17 “immediate, concrete, and specific” injury to even this economic interest.²⁸ Appellants’ allegation
18 of standing, like that in *Snohomish County* and *Harris*, is based on economic injuries, which are
19 not within the zone of interest protected by SEPA. Here, even more so than in *Snohomish County*

20 ²⁴ Order on Motions to Dismiss, *In the Matter of Appeals of Keep Washington Beautiful and Total Outdoor Corp.*
21 From a Determination of Nonsignificant Issued by DPD, Hearing Examiner (HE) File W-13-003 and W-13-004, p. 2
(2013); Order on Motions to Dismiss/Cross Motion for Summary Judgment, *In the Matter of the Appeal of Laurelhurst*
22 *Community Club and Seattle Community Council Federation* from a DNS by DPD, Hearing Examiner (HE) File W-
11-007, p. 2 (2011) (emphasis added).

23 ²⁵ P. 2, No. 9, Order on Motions to Dismiss, *In the Matter of Keep Washington Beautiful and Total Outdoor Corp.*,
HE File W-13-003 and W-13-004.

²⁶ 76 Wn. App. at 53-54.

²⁷ 84 Wn. App. 222, 230-33, 928 P.2d 1111 (1996).

²⁸ *Id.*

1 and *Harris*, Appellants' claims of economic injury arise from a claim of injury to their businesses
2 or other secondary businesses associated with the short-term rental industry (e.g., cleaners,
3 maintenance staff) that will ultimately allegedly have an economic impact on these operators and
4 its employees. Further, the alleged harm to users of Short Term Rentals, is also economic. By
5 SSTR, many utilize short term rentals because they are less expensive than hotels or motels.²⁹
6 This is recognized in the City's report as well³⁰ while recognizing that the more commercial use
7 of short term rentals platforms has taken entire houses, condos and apartment off the long-term
8 housing market.

9 SSTR's claim that the Legislation will reduce the availability of housing³¹ is speculative
10 and without merit. It is possible there will be a slight reduction in the number of defined "Short-
11 Term Rentals" if the Legislation is adopted. City analysis indicates there may be approximately
12 20% of units offered that may not comply with the Legislation, so it is reasonable to anticipate that
13 some units may not modify their business operations within one year of the adoption of the
14 legislation to comply. However, it is speculative to conclude that based on this information there
15 will be any appreciable reduction in housing. Of that approximately 20%, some percentage may
16 instead be utilized for "longer-term rentals" (30 days or more, which is desirable for some segment
17 of users) or sold as owner-occupied or sold to be short-term rentals. Further, motels and hotels
18 continue to be available.

19 Finally, Appellants may allege increased in traffic are within the zone of interest under
20 SEPA, however, it is speculative to say there will be an increase in traffic due to the proposed
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22 ²⁹ See Exhibit B to Pennucci Declaration (print-out from sea to sky rentals website, which acknowledges that Short
Term Rentals are the "Savvy Traveler's hotel alternative". The website goes on to state "For better product, you pay
the same or less- what's not to like?")

23 ³⁰ See Ex. D to Pennucci Decl. (City report, p. 3 states "for visitors, short term rentals offer a more affordable option.")

³¹ SSTR Attachment to Appeal of DNS, in response to Page 2, Question 1, on file with Examiner.

1 legislation, particularly where these uses are already ongoing in the City and the legislation
2 attempts to curb the expansion such uses.³² Rather, these economic impacts are insufficient to be
3 within the zone of interests of SEPA. Appellants attempt to turn their alleged economic injuries
4 into impacts on elements of the environment. This attempt fails and is not within the zone of
5 interests protected by SEPA.

6 **2. Appellants establish no concrete and particularized injury required to**
7 **meet Prong 2 of the SEPA Standing Test.**

8 In addition, the Hearing Examiner has repeatedly recognized that SEPA requires
9 Appellants to show an immediate, concrete and specific injury to establish SEPA standing.³³ As
10 discussed below, none of the appellants have established any such immediate, concrete and
11 specific injury that will flow from the proposed legislation. Rather, the injuries alleged by
12 Appellants are merely hypothetical and speculative. The “impacts” alleged are nearly identical for
13 the four subsets of appellants, however, the City briefly states how each subset fails to establish
14 an immediate, concrete and specific injury to meet Prong 1 of the SEPA standing Test.

15 **a) Owners of Short-Term Rental Properties**

16 The primary injury alleged by owners is both speculative and solely economic – these
17 property owners “harm” stems from a serious of unsubstantiated assumptions. According to
18 Appellants, property owners use the income from short-term rentals to “maintain their properties
19 in excellent condition in order to be competitive on the market.”³⁴ Further, Appellants assume
20 there will be a decrease in income between a short-term rental and long-term rental (or other type
21 of use for the property), that such decrease in income will cause deferred maintenance of units that

22 ³² See Pennucci Decl. at p. 7.

23 ³³ *Id.*

³⁴ P. 9 of both Appeal Letters (May 8, 2017), incorporated into Appellants’ Notices of Appeal, on file with the Examiner.

1 result in aesthetics of a unit it must be shuttered, and this will happen to so many units it will cause
2 “blight” and “causing significant adverse land use and aesthetic impacts.”³⁵ This claim is highly
3 speculative and requires multiple speculative assumptions. This alleged “injury” fails to establish
4 an immediate, concrete and specific injury required to establish standing under SEPA.

5 If fact, the alleged injury requires many assumptions and conjecture not based in the facts.
6 The proposed legislation affects a limited subset of property owners: those owning three or more
7 properties.³⁶ Further, there are multiple exemptions including units in Downtown, South Lake
8 Union and Uptown (Queen Anne) areas.³⁷ Further, the proposal does not restrict longer-term rental
9 (more than 30 days), nor does it prohibit the sale of real property. Property owners may sell their
10 condos, homes or lease them for more than 30 days so it is illogical that owners would simply
11 shutter their investment property rather than sell it or use it for a longer-term rental. Seattle’s real
12 estate market is a place where the cost of rent continues to rise and home sales are at near an all-
13 time high. The demand for rental properties in the City should provide owners with ample amounts
14 of potential longer-term renters or purchasers, if desired.

15 Appellants also assert the restriction on the number of properties that any owner can rent
16 short-term will “cause these owners to redevelop their properties or convert them to owner-
17 occupied units,” reducing rental availability.³⁸ Again, this “injury” is speculative. Property owners
18 might instead sell their property to be a short-term rental exempt from the regulations (e.g., that it
19 was purchased by a property owner as a second home), or it would be sold to be used for longer-
20 term rental that would meet the needs of such users. A property owner or retain their property and
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22 ³⁵ *Id.*

23 ³⁶ See p. 7, lines 16-22 of Ex. C2 to Pennucci Decl.

³⁷ See p. 8, lines 1-9 of Exhibit C2 to Pennucci Decl.

³⁸ *Id.*

1 use it for longer-term rentals (30 days or longer). Even if assumed true (which has not been
2 established), there is no immediate, concrete and specific injury established in either Appellants
3 Notices of Appeal.

4 **b) Managers of Short-Term Rental Properties**

5 Neither SSTRRA or 621 alleged any new or different injury to managers of Short term
6 rentals ("STR") beyond those injuries alleged to property owners, which the City has addressed
7 above. Managers failed to establish managers of STRs will experience an immediate, concrete
8 and injury to meet the "injury in fact" prong of the SEPA standing test.

9 **c) Users of Short-Term Rental Properties**

10 Unnamed members of SSTRRA and Raissa Renee Lyles use short-term rentals in the City.³⁹
11 The alleged injury to those who use short-term rentals includes "limited availability of units close
12 to their destinations" in the City and increased transportation from outside of the City due to that
13 limited availability.⁴⁰ This alleged injury is hypothetical and relies on multiple assumptions.
14 Based on information available in 2017, most short-term rentals can continue under the proposed
15 legislation.⁴¹ Claims that the proposal will limit the availability of temporary housing is
16 hypothetical. It requires additional speculation to conclude short-term users would have to drive
17 further to find a short-term rental and such lack of availability will cause any appreciable increase
18 in traffic. Appellants provide no facts that short-term renters would leave the City to stay in short-
19 term rentals outside the City; rather, it is pure speculation that appellant users would be injured by
20 having to drive from short-term rentals located outside of the City to Seattle-based destinations.

21 **d) Workers and Residents near Short-Term Rental Properties**

22 ³⁹ 621 Appeal Letter at p. 1; SSTRRA Appeal Letter at p. 1.

23 ⁴⁰ See p. 10 of Appeal Letters, on file with the Examiner.

⁴¹ See p. 8, lines 1-9 of Exhibit C2 to Pennucci Decl.

1 SSTRAs alleged injury to those who "live and working near short-term rentals" is
2 similarly speculative. SSTRAs claims that because owners of short-term rentals will not be making
3 as much profit off the units if unable to lease them out for less than 30 days at a time, then the
4 maintenance of the buildings will diminish, causing the appearance of these buildings to be
5 unappealing to neighbors. Beyond mere conjecture, SSTRAs has not and cannot show that
6 individuals who work or live near short-term rental properties will be specifically and perceptibly
7 harmed by the proposed legislation.⁴² If anything, the proposal will cause a slight decrease of STR
8 beyond the existing condition, where they are currently unregulated.⁴³

9 Washington courts have rejected that SEPA standing can be based on citizen status.⁴⁴ To
10 grant SSTRAs standing based solely on a member living or working near a short-term rental provide
11 no meaningful limitation on standing to appeal. SSTRAs has provided no actual injury that is
12 immediate, concrete and specific to a member who lives or works near a short-term rental. Further,
13 even if they had, no specific, immediate injury can be established because these uses are already
14 throughout Seattle. If there is a slight reduction in the number of these short-term rentals, citizens
15 might see less traffic and less noise, particularly in residential areas where short term rentals will
16 be regulated.

17 The Examiner has addressed this same issue in the *Keep Washington Beautiful and Total*
18 *Outdoor* appeal. In that appeal, DPD has proposed legislation to amend certain sections of the
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21 ⁴² *Trepainer v. City of Everett*, 64 Wn. App. 360, 382, 824 P.2d 524 (1992).

22 ⁴³ See p. 6, 2nd paragraph of Ex. E to Pennucci Decl. (DNS provides "To the extent that approximately 20% of the
units currently offered might not comply with the proposal, it is reasonable to anticipate that some
might be able to modify their business operations within one year of the adoption of the legislation to comply, and
that some other locations might need to cease operations.")

23 ⁴⁴ *Snohomish County Property Rights Alliance v. Snohomish County*, 76 Wn. App. 44, 54, 882 P.2d 807 (1994), review
denied, 125 Wn.2d 1025 (1995).

1 City's Sign Code, to adopt an area limit for new wall signs. One of the Appellants, Total Outdoor,
2 alleged a very similar interest to that alleged by the Appellants here:⁴⁵

3 the legislation "will significantly impact local business owners and businesses, depriving
4 them of essential revenue and advertising capabilities on which they rely to maintain their
5 property and sustain their business. As a result, property maintenance will not occur and
6 businesses will close or relocate out of Seattle, causing adverse physical and aesthetic
7 impacts such as deterioration of businesses and vacant storefront. These adverse impacts
8 will harm Appellant and its employees.

9 In that appeal, the Examiner found the claims that legislation will cause reduced building
10 maintenance, vacancies, increased graffiti and blight "were too speculative and conjectural to
11 demonstrate an injury for purposes of conferring SEPA standing."⁴⁶ The Examiner concluded:⁴⁷

12 these claims are based primarily on speculation as to what will happen should the revenue
13 from existing or potential signage be lost, e.g., that owners will vacate or maintain their
14 properties in response to loss of income.... the causal relationship between the proposed
15 legislation and future blight, graffiti or lack of building maintenance, is so tenuous that the
16 claimed harms cannot be considered injuries in fact... The mere fact that Total Outdoor
17 may own or lease property that is subject to the proposed legislation, is not sufficient to
18 give it standing in this case, when the alleged injuries are simply too speculative.

19 Likewise, Appellants' claims of injury are based primarily on speculation on what will
20 happen should the revenue from existing short-term rentals be lost. These economic interests are
21 not within the zone of interests addressed by SEPA, but even if they were, the causal relations
22 between the proposed legislation and future lack of building maintenance or blight is similarly as
23 tenuous and therefore cannot be injuries.

24 VI. CONCLUSION

25 The City respectfully requests that the Examiner dismiss the appeal in its entirety because
26 Appellants have not, and cannot, demonstrate either prong of standing under SEPA.

27 ⁴⁵ P. 2, No. 6 of Order on Motion to Dismiss, HE File W-13-003 and W-13-004.

28 ⁴⁶ P. 2, No. 9 of Order on Motion to Dismiss, HE File W-13-003 and W-13-004.

29 ⁴⁷ Pp. 2-3, No. 9 of Order on Motions to Dismiss, HE File W-13-003 and W-13-004.

1 DATED this 30th day of June 2017.

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1 **CERTIFICATE OF SERVICE**

2 I certify that on this date, I electronically filed a copy of Respondent, **City's Motion to**
3 **Dismiss and Declaration of Aly Pennucci In Support of City's Motion to Dismiss with**
4 **Exhibits A-E attached** with the Seattle Hearing Examiner using its e-filing system.

5 I also certify that on this date, a copy of the same document was sent via email to the
6 following parties:

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13 *Attorneys for Appellant*

14 the foregoing being the last known address of the above-named parties.

15 Dated this 30th day of June, 2017, at Seattle, Washington.

16 
17 ALICIA REISE, Legal Assistant