

May 29, 2020

**OFFICE OF THE HEARING EXAMINER  
KING COUNTY, WASHINGTON**

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**REPORT AND DECISION**

SUBJECT: Department of Local Services file no. **ENFR180736**

**EARL AND ENA SOUSHEK**

Code Enforcement Appeal

Location: 29517 176th Avenue SE, Covington

Appellants: **Earl and Ena Soushek**  
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Maple Valley, WA 98038  
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King County: Department of Local Services  
*represented by* **David Bond**  
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FINDINGS AND CONCLUSIONS:

**Overview**

1. The Department of Local Services (Department) served a notice and order alleging five violations on Earl and Ena Soushek's property. The Sousheks appeal. After hearing the witnesses' testimony, studying the exhibits admitted into evidence, and considering the parties' arguments and the relevant law, we grant the appeal as to the accessory structure, deny the appeal as to grading and materials processing, conditionally grant the appeal as to the cargo containers, and deny (barely) the appeal as to vehicles and debris.

## Background

2. In 2007, the Sousheks applied for a permit to construct a residence and an accessory structure. The permit was approved in 2013.
3. In April 2019, the Department served a stop work order, asserting grading and materials processing without the necessary permits, and requiring that the Sousheks obtain a permit and conduct no additional grading or processing without authorization. Ex. 12 at 001. The Sousheks did not appeal.
4. In October 2019, the Department served a notice and order asserting violations for the (2) grading and materials processing, and also for (1) the accessory structure, (3) cargo containers, (4) inoperable vehicles and parking on non-impervious surfaces, and (5) rubbish, salvage, and debris. Ex. 2. The Sousheks timely appealed. Ex. 3.
5. We held a conference in December; it appeared that the parties might be able to jointly find a path forward. However, by our March conference, the parties were at loggerheads, and we scheduled an April hearing. At the Department’s request—and over the Sousheks’ objection—we rescheduled the hearing to May, setting deadlines for prehearing submittals. For our notices of conferences and hearings, we relied on the party of record mailing list the Department provided; the list included only select Department personnel and the Sousheks. Ex. 1 at 003.
6. Long after our conferences, after the date of our originally-scheduled hearing, and even after the deadline for exhibit submittals for our pushed-back hearing, we received significant neighborhood interest, in the form of over a dozen emails. We responded to each neighbor, explaining that, unlike a true public hearing (such as a rezone or subdivision) where anyone from the public may submit documents or be sworn in and testify at hearing, at our appellate hearing:

testimony [at hearing] will be limited to those persons the Department and Appellants elect to call as witnesses. The Department will need to decide if it wants to call a neighbor(s) as a fact witness to discuss any of the above-listed appeal issues. If you think you have important testimony on one of the listed appeal issues, you may wish to contact [david.bond@kingcounty.gov](mailto:david.bond@kingcounty.gov) and [jeri.breazeal@kingcounty.gov](mailto:jeri.breazeal@kingcounty.gov). Otherwise, public participation on May 4 will be limited to listening to proceeding.
7. At the outset of our May 4 hearing, we noted that, while neighbor testimony did not seem relevant to certain appeal issues (like whether the code allows cargo containers during construction), neighbor testimony could help flush out other appeal issues (like the specifics of materials processing operations). We were surprised that, according to Ms. Breazeal and Mr. Bond, no neighbors contacted them requesting the opportunity to offer testimony. The Department thus had no list of neighbor witnesses to draw from, and it limited its testimony on May 4 to Department staff.

8. Our hearing record, then, is confined to the exhibits and testimony the Sousheks and Department provided. We take judicial notice that the Sousheks’ activities have elicited strong neighborhood concern, but we make no findings on outside-the-record items.

### Analysis

#### Standard

9. Unless directed to by law—and no special directive applies to today’s case—the examiner does not grant substantial weight or otherwise accord deference to agency determinations. Exam. R. XV.F.3. For those matters or issues raised in an appeal statement to an enforcement action, the Department bears the burden of proof. KCC 20.22.080.G; Exam. R. XV.E.2.

#### Detached Accessory Structure

10. The Department’s notice and order asserted that the accessory structure was built within a building setback. The Department scaled this assertion back at hearing, agreeing that the structure’s approval had been valid, but that the structure had been removed from the larger permit file because the Sousheks failed to make substantial progress on the structure.
11. However, the Department threw an even larger curveball at hearing, asserting for the first time that the *entire* building permit, even for the residence itself, had expired. The Department asserted that the extensions were only good for six months and that the last extension ran out in December. That is not what the code seems to contemplate. A permit expires “one year from date of its issue” and permits “may be extended for one year periods.” KCC 16.02.290.<sup>1</sup>
12. The permit record demonstrates this. The original permit was issued on June 27, 2013. Ex. 3 at 015. Extensions were annual affairs, entered into the permit record in June 2014, May 2015, June 2016, August 2017, June 2018 and June 2019. Ex. 14 at 001. There is a document in our record that indicates a December 2017 expiration, but the initial permit itself confirmed that permits are “valid for one year from...date of extension.” Ex. 3 at 015. The permit extension approved June 26, 2019, is valid—at least for the residence—until the **June 27, 2020**.
13. We now return to the accessory structure that was the subject of the notice and order. Unlike the house (where there was no mention, prior to the day of hearing, of any expiration), at the time it extended the permit in June 2019, the County’s Building Official, Chris Ricketts, stated that the “Shop/garage building is not included in this extension as no inspections were completed and approved.” Ex. 10 at 001.

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<sup>1</sup> That is consistent with other permit approvals, where the Department may extend the permit “for one year.” KCC 20.20.105.

14. In its prehearing submittals, the Department highlighted KCC 16.02.290.2 as the provision that led to the accessory structure’s removal. Ex. 4 at 011. That provision (*italics added*) reads:

If construction of a building or structure has not *substantially commenced*, as determined by the building official, within two years from the date of the first issued permit and the building and the structure is no longer authorized by the zoning code or other applicable law, then the permit shall not be extended.

However, Mr. Ricketts agreed at hearing that there was no question the Sousheks had substantially commenced their work. Indeed, the footings are poured, and the girders are up.

15. The Department pivoted to an explanation that the real issue was whether the Sousheks had made “substantial progress” on the accessory structure. That phrase does not appear in Title 16, nor even the term “progress.” The closest use of “substantial” we can find is KCC 16.02.290.4.

The building official may extend a building permit beyond the second extension only to allow completion of a building, structure or mechanical system authorized by the original permit and *substantially constructed*. If *substantial work*, as determined by the building official, has not commenced on a building and/or structure authorized in the original permit, then a new permit will be required for construction to proceed.

16. Mr. Ricketts agreed that he had advised the Sousheks in 2017 to take care of the house first, as the shop could not stand on its own. That makes sense; an accessory structure must, by definition, be accessory to some other legal use. And Mr. Ricketts agreed he had not viewed photos of the work or progress on the structure since 2017. In addition, there is nothing in our record beyond two lines in an email indicating the accessory structure approval was being canceled, nothing such as a formal letter that could be challenged.
17. In the end, we make no broad pronouncements about what “substantial progress” means or whether the accessory structure is “substantially constructed,” or about any sequencing issues between the primary residence and accessory structure, or about what constitutes sufficient notice to an applicant that some or all of a permit is not being renewed, or about whether the permit—in whole or in part—should again be renewed before it expires on June 27.<sup>2</sup> We simply find that, given our limited record, the current building permit—accessory structure and all—is valid until June 27. As of the date our record closed, there was no building violation.

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<sup>2</sup> It is not entirely clear, but given that a building permit is a Type 1 permit—meaning there is no administrative appeal to the examiner, KCC 20.20.020.E—it would appear that any appeal of a denial of an extension request would be through the courts, and not through the examiner.

### Grading and Materials Processing

18. The third alleged violation involves grading and materials processing. We do not start with a blank slate. The April 2019 stop work order asserted violations of grading and materials processing. Ex. 12 at 001. As that order clarified, a failure to timely appeal it meant the conditions existed and constituted a violation. Ex. 12 at 002. That accurately reflects the code’s prescription that a “failure to appeal the stop work order within the applicable time limits renders the stop work order a final determination that the civil code violation occurred, and that work was properly ordered to cease.” KCC 23.28.020.D. However, that is not the end of the analysis. We start with grading and then move on to materials processing.

#### Grading Over 100 Cubic Yards

19. As part of their permit application, in December 2007 the Sousheks submitted a “Road, Grading, Drainage” plan with a large bioswale area east of the shop and crossing the road. Ex. A1 at 005; blowup at Ex. 3 at 051. It shows a sort of a sword shaped area, with the hilt south of the road and the blade north of the road. It is the area in the vicinity of the blade that is the focus of both the grading and the materials processing dispute.
20. The Department’s approved plan shows a similar looking, sword-shaped area. Ex. 11 at 005-06. The Declaration of Covenant the Department had for the Sousheks record also shows this same sword-shaped bio swale area. Ex. 3 at 008. The Sousheks argue that the area they were digging out was that bio swale, and that the permit approved this grading. At first glance, that looked promising to a certain extent for the Sousheks. However, there are three problems.
21. First, while the 2017 aerial photo shows work in what we describe as the sword blade area, the 2019 aerial shows a vastly expanded work area, far beyond the approved sword blade. *Compare* Ex. 8 at 005 *with* 006. And second, because of elevation differences he discovered south of the road and the Puget Sound Energy line along the road, Mr. Soushek explained had to eliminate the swale south of the road and have the drainage swale entirely to the north. Thus, under even a generous view of what the 2013 permit covered, conditions on the ground now do not match the approved plans. That by itself would require an additional permit submittal.
22. There is a third and more fundamental issue. While the bio swale is reflected in the proposal and the approved 2008 site plan, it is not at all clear that this involved major grading. The “Road, Grading, Drainage” submittal discussed above required a minimum depth, but that was only 1.5 feet, not a large pit. The average of the entire storage area appears to be one-foot deep. Ex. A1 at 005; Ex. 3 at 051.
23. Moreover, contemporaneous with that December 2007 submittal, the same month the Sousheks’ engineer submitted a revised Technical Information Report; the Department approved this in March 2008. Ex. 3 at 044. The engineer did not discuss digging out a huge area for a bio swale. In fact, she said the opposite, that “A localized low depression exists on the site and will provide the area for infiltration. There is no proposed disturbance to the infiltration areas.” Ex. 3 at 044 (*italics added*). She calculated that—if

we are reading it correctly—the entire project would create approximately 480 yd.<sup>3</sup> of cut, with a corresponding 480 yd.<sup>3</sup> of fill; as importantly she clarified that “all material both cut and fill will be redistributed on-site.” Ex. 3 at 049.

24. In our 2020 hearing process, the Sousheks submitted cut and fill calculations, totaling 5,952 yd.<sup>3</sup>, to our hearing record. Ex. A4. It is not clear if they are saying these were part of the permit submittal and thus perhaps original permit approval, or something they created after the permit was approved in 2013. It appears to be in the same style of the other documents the Sousheks prepared and submitted in the weeks leading up to our May 4 hearing, and not like the other historic application documents submitted prior to the 2013 permit approval.
25. It is possible the calculation might be based off something submitted to the Department prior to permit approval. However, there is nothing in the record now before us of how their engineer’s December 2007 submittal explaining there would be only 480 yd.<sup>3</sup> of cut (and similar fill) with no proposed disturbance to the infiltration areas (given that the Sousheks’ could instead take advantage of a pre-existing low depression area) morphed into what the Sousheks figure is 5,952 yd.<sup>3</sup> of grading, with a hole big enough that Mr. Bond watched a truck disappear into it. *See also* Ex. 6 at 002 (hole at top of photo). It is possible we are missing something.
26. So, we sustain *a* grading violation. However, where the permit application process can more definitively analyze and explore a topic, we typically narrow our holding to the most basic ground, letting the issue be further flushed out during permit review. The Sousheks’ work in the swale area and beyond is not consistent with the site plan approved in 2008, so they are out of compliance with the approved plans on that ground alone. And while it *appears* that the grading plan the Department approved in 2013 reflected the Sousheks’ engineer’s report estimating grading in the vicinity of 480 ft.<sup>3</sup>, with no proposed disturbance to the infiltration areas, if the Sousheks’ can point to something showing the Department had a plan in front of with something like the 5,952 yd.<sup>3</sup> of recently-estimated grading, plus major excavation in the infiltration area, it might be that the Department’s approval implicitly included that work, reducing the scope of additional review.
27. None of this means the Sousheks’ work is not ultimately approvable, only that they are currently not in compliance with their permit.

#### Materials Processing

28. Mr. Soushek explained that he was excavating the swale area and screening material to get the sand and drain rock he needed for the project. A13 at 003. He says he assumed that because his activities were tied to completing the project, the building and grading permits implicitly authorized those activities. That was not a correct assumption. Nothing in the approved plans showed a processing facility, or even space for that work. It may have made sense and been more economical to create materials himself than, for example, to truck in sand or rocks, but that is not what the permit covered. To illustrate with an analogy, the Department approving a permit to clear an area and construct a

house there does not imply that an applicant can open up a sawmill on site to turn those trees into building materials for the home.

29. Moreover, the approved site plan shows a soil “stockpile” area, indicating that such areas would be expected to appear on a site map. That stockpile is just south of the residence, at the end of the driveway, and nowhere near the drainage swale. Ex. 11 at 005-06. There is no processing area shown anywhere in the vicinity of the swale. Ex. 11 at 005-06. And the Sousheks’ engineer stated in her technical report that “all material both cut and fill will be redistributed on-site.” Ex. 3 at 049. Not only did Mr. Bond observe a dump truck loaded and driven off site, but Mr. Soushek discussed exporting materials off-site.
30. As noted above, legally there was a materials processing operation as of the date the appeal window ran out on the April 2019 stop work order. Even without that now unchallengeable determination, we would still have found a violation. The definition of a materials processing facility is:

A site or establishment, not accessory to a mineral extraction or sawmill use, that is primarily engaged in crushing, grinding, pulverizing or otherwise preparing earth materials, vegetation, organic waste, construction and demolition materials or source separated organic materials and that is not the final disposal site.

KCC 21A.06.742.A (underscore added). Looking at the pictures from November 2018, the Department was correct. Ex. 5 at 001-02; Ex. 7 at 003. It was a site without a legally established residence doing a massive amount of processing that was not the final disposal site for a good portion of the material. The Department’s characterization was accurate that the primary activity on the property was materials processing.

31. However, that is not necessarily accurate going forward. Mr. Soushek noted he has only two piles of dirt left to screen, which is topsoil only. That does not mean that the building permit authorized *any* materials processing simply because it was useful to do that processing in furtherance of an on-site project. But the scenario may be different today than it was at the height of the Sousheks’ major processing operations.
32. When the Sousheks submit their application, they should address quantities and timing of the work they want to complete. Nothing we say here in this enforcement appeal prejudices the outcome of that permit review. However, we do note that, given the concerns of the neighbors about the duration of how long they have had to look at stalled earthmoving equipment, the faster the Department approves some plan to wrap things up and get the equipment off the property, the less time the neighbors have to endure.

### Cargo Containers

33. The Sousheks testified that their three cargo containers are storing materials and equipment they are employing in their construction project. The Department asserted at hearing that cargo containers are not allowed for that use without a permit. We kept the

record open, post-hearing, for the parties to supplement the record on this topic. Both the Sousheks and the Department responded.

34. The Sousheks did their sleuthing and produced a published Department bulletin, *Cargo Shipping Containers: Building Permit Requirements*, that explained that while cargo containers are subject to County building codes, and thus generally require either Department or State Department of Labor and Industries approval, there is an exemption for, “A container used for storage of construction materials and equipment associated with a valid building or grading permit for the property on which it is located.” Ex. A14.<sup>3</sup> As discussed above, the building permit is valid until at least June 27.
35. The Department explained the likely code source for that bulletin. KCC 21A.32.150 states that temporary structures may be allowed during periods of active construction, if used for storage of tools and equipment (or for supervisory offices) and if removed within thirty days of project completion or work ceasing. Ex. 15. The Department asserts that the containers should not be allowed to remain past 30 days of permit completion or invalidation, absent applying for a building permit; that seems to follow directly from the code language.
36. The Department also requests that Mr. Bond be allowed to inspect and confirm that the cargo containers are storing materials related to the permitted construction. It is not clear what the Department thinks the Sousheks might be storing *other than* construction materials and equipment, but given that that the allowance of cargo containers without a permit is an exception to the normal rule that such containers require a building permit, verifying that the exception applies make sense.

#### Inoperable Vehicles or Parking on Non-impervious Surfaces and Rubbish, Salvage, and Debris

37. The Department submitted numerous photos from April 13, 2020, showing an improvement in site conditions over the Department’s photos from a year earlier. *Compare* Ex. 5 at 03-005 *with* 006-012. However, its recent photos still show some materials strewn across the property, rusted tanks, chords, piles, downed tanks, and what appears to be an old vehicle in a wooded area. We find a violation of the cited codes, though not by any means an egregious one.
38. The following week the Sousheks emailed some of their own photos. The comparable shots, showing the inside of the accessory structure, seem to demonstrate some additional cleanup, although there is still a truck parked on what appears to be an impervious surface, a discarded pallet, and some other debris. *Compare* Ex. 5 at 003 & 004 (2019) *with* Ex. A10 at 006 (bottom) & 007. The larger problem is that the Sousheks’ site photos were few and showed only a small portion of the property scope captured in Mr. Bond’s more extensive photos. Ex. A10 at 005-07. The Sousheks’ photos do not cover nearly the full areas documented by Mr. Bond. It is not an apples-to-apples comparison.

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<sup>3</sup> See also <https://www.kingcounty.gov/~media/depts/permitting-environmental-review/dper/documents/forms/Cargo-Container-Building-Permits.ashx?la=en>.



39. On April 13, 2020, Mr. Soushek emailed Mr. Bond, trying to schedule a site visit for the following Thursday or Friday (i.e., April 23 or 24). Ex. A13 at 001. Mr. Bond explained at hearing that he did not follow-up because those dates would have been after exhibits were due on April 20. However, our prehearing order set April 27 as the deadline for *rebuttal* exhibits. An April 23 or 24 site visit would have provided enough time to submit new photos to at least crystallize what the remaining dispute was.
40. While it is frustrating that Mr. Bond did not take the Sousheks up on their offer to visit the site, we (or an appellate court reviewing our findings) can only go by what is in the actual record.<sup>4</sup> And at this point, based on the best evidence in the record, we find a violation. But barely. We do not apply a Better Homes & Gardens standard or the requirements one might find in a declaration of covenants, conditions, and restrictions for a homeowners' association. And while things like open scrap metal or lumber are not allowed in the open, KCC 21A.32.230.A, we recognize the property is, as of this writing, an active construction site with a valid building permit. The Sousheks have a little more cleanup to perform before arranging another site visit, but not too much to achieve substantial compliance.

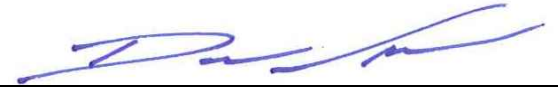
#### DECISION:

1. We GRANT Sousheks' appeal as it relates to (1) the accessory structure.
2. We DENY Sousheks' appeal as it relates to (2) grading and materials processing. By **June 27, 2020**, the Sousheks shall apply for a grading permit. The scope of that review will turn in part on whether the Sousheks can show that their application materials included (and thus that the Department's 2013 approval may have implicitly sanctioned) more than the 480 ft.<sup>3</sup> their engineer estimated and/or that showed extensive grading in the infiltration area. The application should also address disposition of the remaining earthen piles. Thereafter, follow through and obtain approvals.
3. We CONDITIONALLY GRANT the Sousheks' appeal as it relates to (3) the cargo containers. By **June 27, 2020**, the Sousheks shall call Mr. Bond to arrange for an inspection to confirm the content of containers are construction materials and equipment.
4. We DENY the Sousheks' appeal as it relates to (4) inoperable vehicles and parking on non-impervious surfaces and (5) rubbish, salvage and debris. By **June 27, 2020**, the Sousheks shall call Mr. Bond to arrange for an updated inspection to confirm the property is in substantial compliance.

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<sup>4</sup> A neighbor raised a question about examiners visiting sites. Such prehearing visits are more common for public hearings (such as a rezone application) and much rarer for enforcement appeals. Even so, anything we observe on any site visit does not qualify as evidence. As our pertinent rule states, "site inspection observations themselves are not evidence." Exam. Rule. XIII.A.

ORDERED May 29, 2020.




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David Spohr  
Hearing Examiner

### NOTICE OF RIGHT TO APPEAL

King County Code 20.22.040 directs the Examiner to make the County’s final decision for this type of case. This decision shall be final and conclusive unless appealed to superior court by *June 29, 2020*. Either party may appeal this decision by applying for a writ of review in superior court in accordance with chapter 7.16 RCW.

### MINUTES OF THE MAY 4, 2020, HEARING IN THE APPEAL OF EARL AND ENA SOUSHEK, DEPARTMENT OF LOCAL SERVICES FILE NO. ENFR180736

David Spohr was the Hearing Examiner in this matter. Participating in the hearing were David Bond, Jeri Breazeal, Earl and Ena Soushek, Mike Bahrami, Sandy Burkey, Larry Giampapa, Tara Owens and Matt Bristow, and Chris Ricketts. A verbatim recording of the hearing is available in the Hearing Examiner’s Office.

The following exhibits were offered and entered into the record by the Department:

Exhibit no. 1	Department of Local Services staff report to the Hearing Examiner
Exhibit no. 2	Notice and order, issued October 18, 2019
Exhibit no. 3	Appeal, received October 31, 2019
Exhibit no. 4	Codes cited in the notice and order
Exhibit no. 5	Photographs of subject property, dated November 5, 2020
Exhibit no. 6	Aerial photographs of subject property, dated 2019
Exhibit no. 7	Aerial photographs of subject property, dated 2009 and 2011
Exhibit no. 8	Building site plan
Exhibit no. 9	Notes from pre application meeting, dated April 17, 2019
Exhibit no. 10	Email from Ricketts, Chris to Soushek, dated November 29, 2018
Exhibit no. 11	Permit approval conditions, dated November 19, 2008
Exhibit no. 12	Stop work order dated April 11, 2019
Exhibit no. 13	Email from Soushek to Ricketts, Chris December 17, 2019
Exhibit no. 14	Permit extensions record, dated 2014

The following exhibits were offered and entered into the record by the Appellant:

Exhibit no. A1	Letter from Appellants to the Hearing Examiner
Exhibit no. A2	Site inspection checklist no. B07L0300
Exhibit no. A3	Inspection report card, permit no. B07L0300

Exhibit no. A4	Appellants cut and fill calculations
Exhibit no. A5	Permit history
Exhibit no. A6	List of permit fees paid
Exhibit no. A7	Property permit history
Exhibit no. A8	Arial photograph, dated 2007
Exhibit no. A9	Arial photograph, dated April 19, 2020
Exhibit no. A10	Photograph of Appellants property
Exhibit no. A11	Aerial Photo and Approved Site Plan comparison dated 2019, received April 27, 2020
Exhibit no. A12	PSE Agreement and Utility Plan, received April 27, 2020
Exhibit no. A13	Email communication, received April 27, 2020

The following exhibits were offered and entered into the record by on May 7, 2020:

Exhibit no. A14	Appellant email with Cargo Shipping Containers document, received May 4, 2020
Exhibit no. 15	Department email, received May 6, 2020

DS/jf

May 29, 2020

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**CERTIFICATE OF SERVICE**

SUBJECT: Department of Local Services file no. **ENFR180736**

**EARL AND ENA SOUSHEK**  
Code Enforcement Appeal

I, Jessica Oscoy, certify under penalty of perjury under the laws of the State of Washington that I transmitted the **REPORT AND DECISION** to those listed on the attached page as follows:

- EMAILED to all County staff listed as parties/interested persons and parties with e-mail addresses on record.
- placed with the United States Postal Service, with sufficient postage, as FIRST CLASS MAIL in an envelope addressed to the non-County employee parties/interested persons to addresses on record.

DATED May 29, 2020.



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Jessica Oscoy  
Legislative Secretary

**Allen, Brett/Aisha**

Hardcopy

**Bahrani, Mike**

**Bond, David**

Department of Local Services

**Breazeal, Jeri**

Department of Local Services

**Brown, Patrick**

Hardcopy

**Burkey, Sandy**

Hardcopy

**Dalpay, Tom**

Hardcopy

**Deraitus, Elizabeth**

Department of Local Services

**Derrick, Joe**

Hardcopy

**Giampapa, Dean**

Hardcopy

**Giampapa, Larry/Diane**

Hardcopy

**Lux, Sheryl**

Department of Local Services

**Owens/Bristow, Tara/Matt**

Hardcopy

**Peterson, Robert/Jane**

Hardcopy

**Rehberg, John**

Hardcopy

**Ricketts, Chris**

Department of Local Services

**Soushek, Earl/Ena**

Hardcopy

**Stusser, Kristi/Steve**

Hardcopy

**Williams, Toya**

Department of Local Services