Case No. S238563

IN THE SUPREME COURT OF THE
STATE OF CALIFORNIA

UNION OF MEDICAL MARIJUANA PATIENTS, INC.,

Plaintiff and Appellant,

v.

CITY OF SAN DIEGO,

Defendant Respondent,

CALIFORNIA COASTAL COMMISSION,

Real Party in Interest.

After A Decision by the Court of Appeal of the State of California
Fourth District, Division One, D068185

San Diego County Superior Court
The Honorable Joel Wohlfeil (Case No. 37-2014-00013481-CU-TT-CTL)

APPLICATION FOR LEAVE TO FILE AMICUS CURIAE BRIEF AND [PROPOSED] BRIEF OF LEAGUE OF CALIFORNIA CITIES AND CALIFORNIA STATE ASSOCIATION OF COUNTIES IN SUPPORT OF THE CITY OF SAN DIEGO

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IN THE SUPREME COURT OF THE STATE OF CALIFORNIA

Case No. S238563

CERTIFICATE OF INTERESTED ENTITIES OR PERSONS

This is the initial certificate of interested entities or persons submitted on behalf of Amici Curiae League of California Cities and California State Association of Counties in the case number listed above.

The undersigned certifies that there are no interested entities or persons that must be listed in this certificate under California Rules of Court, rule 8.208.

Dated: November 17 2017 BEST BEST & KRIEGER LLP

By: Michelle Ouellette

MICHELLE OUELLETTE
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APPLICATION FOR LEAVE TO FILE AMICUS CURIAE BRIEF IN SUPPORT OF THE CITY OF SAN DIEGO

Pursuant to Rule 8.520, subd. (f) of the California Rules of Court, the League of California Cities ("League") and California State Association of Counties ("CSAC") respectfully applies for permission from the presiding justice to file the Amicus Curiae Brief in support of Defendant and Respondent, the City of San Diego.

The League is an association of 475 California cities dedicated to protecting and restoring local control to provide for the public health, safety and welfare of their residents, and to enhance the quality of life for all Californians. The League is advised by its Legal Advocacy Committee, which is comprised of 24 city attorneys from all regions of the State. The Committee monitors litigation of concern to municipalities, and identifies those cases that are of statewide—or nationwide—significance. The Committee has identified this case as being of such significance.

CSAC is a non-profit corporation. Its membership consists of the 58 California counties. CSAC sponsors a Litigation Coordination Program, which is administered by the County Counsels' Association of California and is overseen by the Association's Litigation Overview Committee comprised of county counsels throughout the state. The Litigation Overview Committee monitors litigation of concern to counties statewide. The Committee has determined that this case raises important issues that affect all counties.

The League and CSAC have a direct interest in the legal issues presented in this case because their member cities and counties regularly adopt ordinances that may be classified as zoning ordinances, and are required to determine when their discretionary acts, such as the adoption of ordinances, are subject to review under Public Resources Code section

21000 et seq., the California Environmental Quality Act ("CEQA"). Accordingly, any decision by this Court as to whether "zoning ordinances" as referenced in Public Resources Code section 21080, subd. (a) of CEQA are categorically "projects" subject to environmental review under CEQA will directly and significantly impact all of the League and CSAC's member cities and counties. The perspective of the League and CSAC on this important, statewide issue will assist the Court in deciding the Petition, as the League and CSAC are in a unique position to provide the Court with examples of ordinances that might be considered "zoning ordinances," but that do not result in direct or reasonably foreseeable indirect physical changes to the environment and so should not be subject to CEQA review. They are also able to assist the Court by providing information regarding the likely waste of public resources that would result if cities and counties were required to undertake CEQA review, and potential legal defense, of ordinances that have, at most, speculative environmental impacts.

Counsel for the League and CSAC have examined the briefs on file in this case, are familiar with the issues and the scope of their presentation, and do not seek to duplicate those briefs. Per California Rules of Court, rule 8.520, subd. (f)(4), no counsel for any party has authored the Proposed Amicus Brief in whole or in part, and no such counsel, party, or other entity made a monetary contribution intended to fund the preparation or submission of this Brief.

For these reasons, the League and CSAC respectfully request leave to file the Amicus Curiae Brief contained herein.

Dated: November 17 2017

BEST BEST & KRIEGER LLP

By: Michelle Ouellette

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I.

INTRODUCTION

Amici Curiae League of California Cities ("League") and California State Association of Counties ("CSAC") file this amicus brief in support of Defendant and Respondent, the City of San Diego ("City"). This brief addresses one of two issues presented for review: "Is amendment of a zoning ordinance an activity directly undertaken by a public agency that categorically constitutes a 'project' under CEQA?"

As the League and CSAC's member cities and counties regularly adopt ordinances that may be classified as zoning ordinances, and are required to determine when their discretionary acts, such as the adoption of ordinances, are subject to review under Public Resources Code section 21000 et seq., the California Environmental Quality Act ("CEQA"), any decision by this Court as to whether "zoning ordinances" are categorically "projects" under CEQA will directly and significantly impact all of the League and CSAC's member cities and counties.

Petitioner, the Union of Medical Marijuana Patients ("UMMP"), argues that Public Resources Code section 21080, subd. (a) should be read to require that all "zoning ordinances" be considered "projects" subject to CEQA review *per se*, without reference to whether the ordinances meet the definition of a "project" found in Public Resources Code section 21065, namely that the ordinances are discretionary activities that may "cause either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment."

But, as discussed in this brief, requiring cities and counties to treat all "zoning ordinances" as "projects" under CEQA, without reference to the ordinance's potential to result in direct or reasonably foreseeable indirect impacts on the environment, would lead to premature and speculative CEQA review, to the absurd result of cities and counties conducting

environmental review of administrative and procedural ordinances that plainly have no bearing on the environment. This would lead to an interpretation of the definition of "project" found in Public Resources Code section 21065 that is contrary to the rules of statutory interpretation and would render the definition essentially meaningless. Further, requiring environmental analysis under CEQA for ordinances that do not meet the definition of a "project" in Public Resources Code section 21065 would result in a waste of public resources by all cities and counties in the State. They would be forced to expend staff time and materials on meaningless environmental review, as well as staff and attorney time and materials to defend CEQA lawsuits challenging the degree to which they carried out this meaningless review.

For these reasons, as more fully explained below, the League and CSAC respectfully request that this Court find that the amendment of a zoning ordinance is a "project" under CEQA only when the ordinance meets the definition of a "project" set forth in Public Resources Code section 21065.

II.

FACTUAL AND PROCEDURAL BACKGROUND

Amici hereby adopt, and do not repeat, the Statement of the Case and Standard of Review contained at pages 8 through 12 of the City's Answer Brief on the Merits.

III.

LEGAL DISCUSSION

A. Cities and Counties Regularly Adopt "Zoning Ordinances" That Do Not Meet the Definition of a "Project" in Public Resources Code Section 21065.

1. Cities and counties should not be required to conduct CEQA review of "zoning ordinances," which, at the time of their adoption, do not present any identifiable direct or reasonably foreseeable indirect changes to the environment.

Cities and counties regularly adopt zoning ordinances that concern the regulation of land, but that, at the time of the ordinances' adoption, do not constitute a commitment to a "definite course of action" and so cannot have a direct or reasonably foreseeable indirect impact on the environment. As this Court held in *Save Tara v. City of West Hollywood* (2008) 45 Cal.4th 116, 139 ("*Save Tara*") the key question to determining whether CEQA review is required is whether, even after adopting a zoning ordinance concerning the regulation of land, a city or county has retained discretion to authorize a different use of the land, impose mitigation measures on the use, or disapprove the use altogether, after CEQA review is completed. Because "CEQA review has to happen far enough down the road toward an environmental impact to allow meaningful consideration in the review process of alternatives that could mitigate the impact" as long as the ordinance retains the discretion detailed in *Save Tara*, it would be premature to conduct CEQA review. (*Friends of the Sierra Railroad v. Tuolumne Park & Recreation Dist.* (2007) 147 Cal.App.4th 643, 657.)

For instance, cities and counties should not be burdened with the obligation to conduct expensive and speculative environmental review any time they adopt an ordinance that merely authorizes the submission of an application for a conditional use permit that, if approved, would allow for the placement of a given use in a certain district of the city or county. Such an ordinance does not commit the city or county to any direct course of action, other than to review an application for the conditional use permit – the consideration of which is a discretionary act that likely would, itself, be subject to CEQA review. (Public Resources Code, § 21065.) When adopting such ordinances, cities and counties retain the right to approve the

placement of a different use in the district, to impose mitigation measures on the conditional use, or to disapprove the conditional use permit application altogether, once CEQA review is completed. To require that they conduct substantive CEQA review of zoning ordinances that approve nothing and commit to nothing would slow, and potentially impede, the adoption and regular updating through amendment of the comprehensive zoning regulations that are necessary to ensure the health and welfare of cities and counties.

2. Any bright-line rule subjecting "zoning ordinances" to automatic CEQA review would lead to absurd consequences.

The term "zoning ordinance" is not defined in CEQA, nor in the State's Planning and Zoning laws. (*See* Public Resources Code, §§ 21000 et seq. and Government Code, §§ 65000 et seq.)[1] As such, California cities and counties have selected different names for the codes that set forth their regulations and procedures related to zoning. Some of these are called Development Codes, some Planning Codes, and some are called Zoning Codes. Nearly all of these Codes include a significant number of ordinances concerning topics such as the establishment and administration of planning and historic commissions and planning agencies, the administration of various types of permits, the payment of application and appeal fees, and the processing and noticing of appeals. (*See e.g.* Request for Judicial Notice ("RJN"), Exh. A [Chapter 2.0 "Administration and Procedures" of the Ontario Development Code], Exh. B [Chapter 17.05, "Landmarks Preservation Advisory Board," Chapter 17.132, "Administrative Appeal Procedure"], and Exh. C [Chapter 17.150, "Fee Schedule" of the Oakland Planning Code, or Section 1.2, "Planning

[1] Government Code section 65850 provides a list of the types of ordinances that would be considered "zoning regulations" under Chapter 4, "Zoning Regulations," including the regulation of uses, signs, billboards, placement and size of structures, parking, setbacks, and civic districts.

Agency," Section 1.2 "County Board of Supervisors," Section 1.3 "County Planning Commission," Section 1.4 "Planning Department," and Sections 1.6 through 1.11 regarding notices of public hearings in the Riverside County Zoning Ordinance].)

Should this Court adopt UMMP's position that all "zoning ordinances" are *per se* "projects" subject to review under CEQA, and given that there is no definition as to what constitutes a "zoning ordinance," future members of the public, including future litigants, may argue that any ordinances within these Codes are "zoning ordinances," and insist that CEQA review is required. And yet, none of these ordinances — concerning topics such as the establishment and administration of commissions and planning agencies, the administration of various types of permits, the payment of application and appeal fees, and the processing and noticing of appeals — would meet the test for "projects" in Public Resources Code section 21065, as they could not result in any direct or reasonably foreseeable indirect impact on the environment. The ordinances simply do not concern the environment. For instance, ordinances establishing planning commissions and historic preservation boards, or setting appeal or public hearing noticing procedures do not authorize any physical activity, and certainly none that could impact the environment — not now and **not ever** in the future. (*See e.g.* RJN, Exhs. A, B, and C.)

As such, a ruling which categorically compelled CEQA review for "zoning ordinances" would lead to absurd results, requiring cities and counties to conduct meaningless and unnecessary environmental review of ordinances whose topics are purely administrative and procedural. CEQA does not favor such a result. (*See Save the Plastic Bag Coalition v. City of Manhattan Beach* (2011) 52 Cal.4th 155, 175 ["Common sense in the CEQA domain is not restricted to the exemption provided by the regulatory guideline . . . . [i]t is an important consideration at all levels of CEQA

review"].) The rules of statutory construction provide that the "language of a statute should not be given a literal meaning if doing so would result in absurd consequences which the Legislature did not intend." (*Younger v. Superior Court* (1978) 21 Cal.3d 102, 113.) Thus, "[t]he intent prevails over the letter, and the letter will, if possible, be so read as to conform to the spirit of the act." (*People v. Pieters* (1991) 52 Cal.3d 894, 899.) Here, as discussed in pages 24 through 25 of the City's Answer Brief on the Merits, the legislative history of Public Resources Code section 21065 confirms that the Legislature intended to limit the application of CEQA to only those activities that result in a direct or reasonably foreseeable indirect change in the environment. Accordingly, cities and counties should not be compelled to undertake the illogical exercise of conducting meaningless CEQA review of ordinances that the Legislative never intended be considered "projects" subject to CEQA.

B. Requiring Compliance With CEQA For Zoning Ordinances That Do Not Present Any Identifiable Direct or Reasonably Foreseeable Indirect Changes to the Environment Would Result in a Waste of Public Resources.

1. Cities and counties must spend a considerable amount of both staff time and resources on environmental review for any ordinance that is a "project" under CEQA.

Should this Court adopt UMMP's position that all "zoning ordinances" are *per se* "projects" subject to review under CEQA, city and county staff will have to spend a considerable amount of time and resources on a meaningless, and perhaps duplicative, exercise. Specifically, cities and counties will be required to conduct empty environmental review of activities having no identifiable or reasonably foreseeable effects on the environment, including likely drafting unnecessary CEQA findings, ensuring that these unnecessary CEQA determinations are appropriately

agendized, and, potentially, noticing these determinations with the County Clerk.

CEQA Guidelines[2] section 15061 requires that, if a lead agency determines that an activity is a "project subject to CEQA" (a step that, under UMMP's theory of the case, would be superfluous any time a city or county considered adoption of a zoning ordinance), a lead agency must next determine whether the "project" is exempt from CEQA. Even assuming that a city or county's staff determines that the zoning ordinance in question is exempt from further CEQA review, the city's or county's work to comply with CEQA is not done. In other words, UMMP's theory of the case would not impose just a passing burden on cities and counties; it would require the unnecessary and wasteful expenditure of significant additional staff time and resources, with no resulting environmental benefit.

First, although it is likely that a city or county would find the zoning ordinance exempt pursuant to the so-called "common-sense" exemption set forth in CEQA Guidelines section 15061, subd. (b)(3),[3] the city and county would still expend time and resources to make this finding that it would not otherwise expend on a zoning ordinance that does not constitute a "project" under CEQA. Formal findings are not required when a lead agency determines that a "project" is exempt from CEQA. However, this Court has held that a lead agency must review the factual record when making the determination that the "common-sense" exemption applies. (*Muzzy Ranch Co. v. Solano County Airport Land Use Comm'n* (2007) 41 Cal.4th 372, 386 ["*Muzzy Ranch*"].) Accordingly, in order to establish that such a review of the factual record has occurred in compliance with *Muzzy Ranch*,

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[2] California Code of Regulations, Title 14, Chapter 3, §§ 15000 et seq.
[3] This exemption is based on "the general rule that CEQA applies only to projects which have the potential for causing a significant effect on the environment," *Id.* at § 15061, subd. (b)(3).

any city or county wishing to use the "common-sense" exemption for a zoning ordinance would, conservatively, need to prepare written documentation of this review prior to adopting the zoning ordinance.

Second, read conservatively, *San Joaquin Raptor Center v. County of Merced* (2013) 216 Cal.App.4th 1167, 1179, requires cities and counties to separately agendize their proposed CEQA determinations for any "project" placed on an agenda for approval. Accordingly, if this Court were to accept UMMP's theory of the case, then for each body that considers a proposed zoning ordinance, including planning commissions, landmark boards, city councils, and boards of supervisors, cities and counties would be required to prepare agendas listing items not just for the bodies' consideration of recommendation of approval or approval of a zoning ordinance, but also for the bodies' consideration of recommendation of adoption or adoption of a CEQA exemption for the zoning ordinance.

Third, if a city or county wanted to limit the amount of time that a zoning ordinance it found to be exempt from CEQA would be subject to challenge under CEQA, thus limiting its exposure to the expense of CEQA litigation, cities and counties would also need to spend staff time and resources to prepare, file, and post a Notice of Exemption with the applicable County Clerk.[4] Under Public Resources Code section 21108, subd. (b) and CEQA Guidelines § 15062, subd. (a), staff must include in a Notice of Exemption the location of the project, a brief project description, a finding that the "project" is exempt from CEQA, including a citation to the appropriate section of the CEQA Guidelines or statute under which it is found exempt, and a brief statement of reasons to support the finding that

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[4] The filing and posting of a Notice of Exemption is voluntary in most, though not all, cases. (Public Resources Code, § 21108.) Still, public agencies routinely file these notices to shorten the statute of limitations to 35 days and thus diminish the risk to the public of a CEQA lawsuit.

the project is exempt. The notice must be filed with the county clerk of the county in which the project will be located, and a copy of the notice must be made available for public inspection. (Public Resources Code, § 21152(b)–(c); CEQA Guidelines § 15062, subd. (c)(2).) The county clerk must post the notice within 24 hours after receiving it, and the notice must remain posted for 30 days. The clerk then must return the notice to the lead agency, with a notation of the period that the notice was posted. The lead agency must then retain the notice for at least one year. (Public Resources Code, § 21152, subd. (c); CEQA Guidelines § 15062, subd. (c)(2).) Unless cities and counties expend the staff time and materials to prepare and post Notices of Exemption, any zoning ordinances they adopt would be subject to legal challenge for a period of 180 days, or six months, after adoption. (Public Resources Code, § 21167, subd. (d).)

Fourth, and finally, the decision to prepare and post a Notice of Exemption also subjects cities and counties to further expenditure of resources, as County Clerks charge posting fees for the Notices. While the amount of this fee varies throughout the state, in Los Angeles County, for example, the Registrar/Recorder/County Clerk's Notice of Exemption posting fee for each Notice is $75.00. (RJN, Exh. D.)

As detailed above, cities and counties would be required to spend significant amounts of staff time and resources on environmental review for any ordinance that is a "project" under CEQA. To require them to expend these resources to adopt any zoning ordinance, regardless of whether the ordinance is actually a "project" as defined under Public Resources Code section 21065, would result in a never-ending and unnecessary waste of public resources. Indeed, such review is entirely unnecessary, as environmental review of any project will take place at a later stage, such as when a conditional use permit application is received.

2. Cities and counties must spend staff and attorney time and materials to defend CEQA lawsuits.

While it is true that today, under Public Resources Code section 21167, subd. (a), a CEQA lawsuit may be brought to challenge a city or county's adoption of a zoning ordinance whether or not CEQA review has been conducted, a decision by this Court holding that all "zoning ordinances" are *per se* "projects" subject to CEQA could create an unnecessary new wave of CEQA litigation, and an unnecessary new financial burden on cities and counties. A litigant, whatever their motive, would have a new basis to bring lawsuits, as it could newly assert that a city or county violated CEQA by not conducting environmental review for an ordinance that the litigant alleges constitutes a "zoning ordinance" under Public Resources Code section 21080, subd. (a). A city or county who, for example, logically determined that an ordinance setting permitting fees, or one that extended the noticing period for appeals of land use permits was not a "zoning ordinance" could find itself engaged in expensive litigation over this question, including whether the simple fact that an ordinance was part of the city or county's Development Code, Planning Code, or Zoning Code made the ordinance, *per se*, subject to CEQA.

Further, even if victorious in this type of CEQA litigation, cities and counties will generally not be able to recoup their attorney's fees. This is because, while Code of Civil Procedure section 1021.5 provides for any successful party in litigation to seek an award of attorney fees, cities and counties are rarely able to prove, as required by section 1021.5, that the burden of litigation transcends its interest in the controversy. (*See City of Hawaiian Gardens v. City of Long Beach* (1998) 61 Cal.App.4th 1100, 1112-13.) Additionally, cities and counties often have difficulty recovering their full costs. (*See e.g. Coalition for Adequate Review v. City and County of San Francisco* (2014) 229 Cal.App.4th 1043, 1060-61 [Court denied

victorious City its labor costs in reviewing the incomplete administrative record prepared by petitioner].)

To subject cities and counties to a new wave of CEQA litigation would require them to expend significant resources to defend the adoption of zoning code ordinances, regardless of whether the ordinance is actually a "project" as defined under Public Resources Code section 21065. It would result in a potentially never-ending and always unnecessary waste of public resources.

IV.

CONCLUSION

For the forgoing reasons, amici League and CSAC respectfully request this Court find that the amendment of a zoning ordinance is a "project" under CEQA only when the ordinance meets the definition of a "project" set forth in Public Resources Code section 21065.

Dated: November 17 2017 BEST BEST & KRIEGER LLP

By: Michelle Ouellette

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CERTIFICATION OF COMPLIANCE

I certify that the text of this brief consists of 3,194 words as counted by the Microsoft Word word-processing program used to generate this brief.

Dated: November 17 2017 BEST BEST & KRIEGER LLP

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IN THE SUPREME COURT OF CALIFORNIA

PROOF OF SERVICE

Union of Medical Marijuana Patients, Inc.. v. City of San Diego, et al.

S238563

4th Civil No. D068185
San Diego County Superior Court
Case No. 37-2014-00012481-CU-TT-CTL

I, the undersigned, declare that:

I was at least 18 years of age and not a party to the case; I am employed in the County of Riverside, California, where the mailing occurs; and, my business address is 3390 University Avenue, 5th Floor, Riverside, California 92501.

I served the foregoing document:

APPLICATION FOR LEAVE TO FILE AMICI CURIAE BRIEF AND [PROPOSED] BRIEF OF LEAGUE OF CALIFORNIA CITIES AND CALIFORNIA STATE ASSOCIATION OF COUNTIES IN SUPPORT OF THE CITY OF SAN DIEGO

to the following:

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[BY U.S. MAIL]

I further declare I served the individuals named below by placing a true and correct copy of the documents in a sealed envelope and placed it for collection and mailing with the United States Postal Service this same day, at my address shown above, following ordinary business practices. [CCP § 1013(a).]

I further declare that I am readily familiar with the business' practice for collection and processing of correspondence for mailing with the United States Postal Service; and that the correspondence shall be deposited with the United States Postal Service this same day in the ordinary course of business.

The Honorable Joel Wohlfeil
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I declare under penalty of perjury and the laws of the State of California that the foregoing is true and correct. Executed on November 20, 2017, at Riverside, California.

Monica Castanon
Legal Secretary