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2d Civil No. B216515
LASC Case No. BS112956

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SUPREME COURT
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SUPREME COURT

OF THE STATE OF CALIFORNIA

PACIFIC PALISADES BOWL MOBILE ESTATES, LLC
Plaintiff and Appellant,

vs.

CITY OF LOS ANGELES
Defendant and Appellant.

ANSWER TO PETITION FOR REVIEW

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I. INTRODUCTION

This case concerns a local zoning matter: Pacific Palisades Bowl Mobile Estates LLC's (Palisades Bowl) attempts to obtain the City of Los Angeles' review of its incomplete application to convert its mobilehome park to residential ownership under Government Code section 66427.5[1]. The park is located in the coastal zone as defined in the Coastal Act; consequently, the City required Palisades Bowl to apply for a Mello Act clearance and for a coastal development permit from the City. Palisades Bowl contended that these City requirements were not mandated under state law and were therefore preempted. Ultimately, the *Pacific Palisades Bowl Mobile Estates LLC v. City of Los Angeles* panel applied long established principles to hold that the Mello Act and the Coastal Act provide state law mandates which the City may not ignore in reviewing Palisades Bowl's proposed section 66427.5 mobilehome park conversion. 187 Cal.App.4th 1461.

This Petition for Review is remarkable solely because, for the first time since this litigation started, Palisades Bowl challenges the Coastal Act's application to its proposed mobilehome park conversion. Throughout the prior litigation, up through and including

[1] For the remainder of this Answer, Government Code section 66427.5 will be referred to as "section 66427.5."

oral argument before the Appellate Court, Palisades Bowl admitted that it did not question the Coastal Act's application to its proposed mobilehome park conversion. In its written papers, Palisades Bowl conceded "Palisades Bowl does not contend here (nor did it contend to the trial court) that §66427.5 somehow preempts the state statutes that require it to obtain a coastal development permit from the Coastal Commission." Palisades Bowl's Combined Respondent's Brief and Cross-Appellant's Opening Brief, at page 40, footnote 7. Similarly, in its oral argument before Appellate Court, Palisades Bowl maintained that it did not contest the Coastal Act's application to its mobilehome park conversion.

The petition for review does not meet the criteria for Supreme Court review. Specifically, the Petition does not, as it must, demonstrate a conflict among published decisions or a necessity to settle an important question of law. The Petition also attempts to recast the holding of *Sequoia Park Associates v. Sonoma County* (2009) 176 Cal.App.4th 1270 in an attempt to generate a conflict with the *Palisades Bowl* decision that does not exist. Finally, Palisades Bowl's earlier and consistent admissions regarding application of the

Coastal Act's application to its proposed mobilehome park conversion demonstrate that the law in this area is already settled.

II. FACTS AND PROCEEDINGS BELOW

Palisades Bowl owns a mobilehome park with more than 170 units, located across Pacific Coast Highway from Will Rogers State Beach. *Pacific Palisades Bowl Mobile Estates, LLC* (2010) 187 Cal.App.4th 1461, 1467. In April 2007, Palisades Bowl representatives contacted the City to discuss various issues related to its proposed mobilehome park conversion whereupon they were provided a package of materials, including various forms and instructions (such as those related to Mello Act clearances and coastal development permits), and a tract map checklist. *Id.* at 1468.

Palisades Bowl representatives went to the Planning Department counter in June 2007 and attempted to submit an incomplete application for the proposed subdivision and were advised that the application was incomplete. *Id.* In August 2007 the Chief Zoning Administrator for the Department of City Planning, Michael LoGrande, assigned a case manager, Richard Ferguson, to work directly with Palisades Bowl. Over the next few months, Ferguson had several communications with representatives of Palisades Bowl,

both telephonic and by e-mail, regarding various issues, including the requirements Palisades Bowl needed to satisfy and the allowable scope of the City's review of the proposed subdivision.

On November 13, 2007, representatives of Palisades Bowl arrived at the Planning Department counter to submit its conversion application. Planning staffers Harper and Ferguson advised that the application was incomplete and that Ferguson would send a follow up email. On November 20, 2007, Ferguson sent an e-mail to Palisades Bowl's engineer, listing "the items you need to file your application." The email specifically mentioned an application for a coastal development permit from City and an application to the Housing Department for clearance under the Mello Act. *Id.* at 1469.

No further action was taken, by the City or Palisades Bowl, until Palisades Bowl filed the petition for writ of mandate and complaint for injunction and declaratory relief on January 17, 2008. The petition/complaint alleged the City failed to compile a proper list of items needed to apply for a mobilehome park conversion, improperly refused to accept Palisades Bowl's application, and should be deemed complete under the Permit Streamlining Act.

The trial court concluded that Ferguson's November 20 e-mail substantially complied with the Permit Streamlining Act's requirement that the City provide a written completeness determination. The trial court also found that the language of Government Code section 66427.5(e) precluded the City from requiring compliance with the Mello Act and preempted what the trial court considered the City's local (not State mandated) requirement that Palisades Bowl apply for a coastal development permit from the City. *Id.* at 1470.

The trial court entered judgment and issued a peremptory writ commanding the City to deem Palisades Bowl's application complete and evaluate the application for approval, conditional approval, or disapproval. The City appealed the judgment and Palisades Bowl cross-appealed. The City contended the Mello Act and the Coastal Act could be harmonized with section 66427.5, and that the trial court erred by finding that section 66427.5 precluded the City from requiring Palisades Bowl to comply with the Mello and preempted the City from requiring a coastal development permit. Palisades Bowl contended the trial court abused its discretion in finding that the City

satisfied the requirement of the Permit Streamlining Act to provide a written completeness determination. *Id.* at 1471.

The Appellate Court issued a published decision on August 31, 2010, upholding the trial court's determination that Palisades Bowl was not entitled to have its application deemed complete due to the City's alleged failure to comply with the Permit Streamlining Act. Palisades Bowl does not seek review of that portion of the opinion. The Appellate Court also decided that section 66427.5 does not preclude the City from imposing conditions and requirements mandated by the Mello Act and Coastal Act on a subdivider seeking to convert a mobilehome park located in the coastal zone. The panel determined that the City was following state law mandates in requiring Palisades Bowl to obtain a coastal development permit and a Mello Act clearance from the City. *Id.* at 1484-1485.

The *Palisades Bowl* appellate panel concluded that Section 66427.5 did not exempt a mobilehome park conversion applicant from having to comply with the Coastal Act and the Mello Act mandates that a developer obtain a coastal development permit and to preserve low and median income units to be converted in the coastal zone: "To be sure, the policy behind section 66427.5 is an important one-to

encourage conversions of mobilehome parks to resident ownership while protecting nonpurchasing residents....But the policy considerations behind the Coastal Act-as well as the Mello Act, inasmuch as its genesis was the Coastal Act [citations]-are far more extensive." *Id.* at 1485.

The court found that section 66427.5 did not offer as much protection of affordable housing as the Mello Act did. "[T]he Mello Act preserves the availability of housing units in the coastal zone dedicated to persons and families of low or moderate income; section 66427.5 would diminish the availability of such dedicated housing units. In short, the protections for low and moderate income persons and families provided by section 66427.5 does not provide the kind of protection so clearly mandated by the Mello Act." *Id.* at 1483.

The court also noted that the Coastal Act 'is an attempt to deal with coastal land use on a statewide basis.' (*Yost v. Thomas* (1984) 36 Cal.3d 561, 571...; see also *Charles A. Pratt Construction Co., Inc. v. California Coastal Com.* (2008) 162 Cal.App.4th 1068, 1075..["a fundamental purpose of the Coastal Act is to ensure that state policies prevail over the concerns of local government"]. *Id.* at 1479.

The court concluded "[I]n light of the 'paramount concern' for protecting coastal resources by regulating development as expressed in the Coastal Act (and by implication, the Mello Act), we conclude that section 66427.5 does not preclude the City from imposing conditions and requirements mandated by the Mello Act and Coastal Act on a subdivider seeking to convert to resident ownership a mobilehome park located in the coastal zone." *Id.* at 1485.

On October 13, 2010, Palisades Bowl filed this Petition in the Supreme Court. Although Palisades Bowl had the opportunity to file a petition for rehearing under Rule of Court 8.268, it did not. Contrary to the requirements for Rule of Court 8.504(b)(3), the Petition does not state whether a petition for rehearing was filed.

III. THERE ARE NO GROUNDS UNDER 8.500 FOR GRANTING THE PETITION FOR REVIEW

In an attempt to manufacture a "conflict" for purposes of Rule of Court 8.500, Palisades Bowl now recasts the holding in *Sequoia Park, supra.* The *Sequoia Park* court did not hold that a mobilehome park subdivision was subject to the exclusive control of Government Code ¶ 66427.5 to the exclusion of other State mandates, as Palisades Bowl contends. Rather, the *Sequoia Park* court held that Government

Code ¶ 66427.5 pre-empted Sonoma County's local ordinance, which provisions "deviat[ed] from state-mandated criteria for approving a mobilehome park conversion application." *Sequoia Park v. Sonoma County* (2009) 176 Cal.App.4th 1270, 1299.

The *Palisades Bowl* panel explicitly noted that the *Sequoia Park* holding did not pertain to a situation where, as here, the City of Los Angeles applied state law mandated requirements to a section 66427.5 conversion: "Two prior decisions interpreting subdivision (e) have held that it precludes local authorities from 'inject[ing] ...factors [other than those set forth in the statute] when considering an application to convert an existing mobilehome park form a rental to a resident-owner basis.'....Neither decision, however, addresses a situation in which the local authority imposed requirements that it contended were mandated by another state statute, and thus neither controls here." 187 Cal.App.4th 1461, 1476-1477.

The *Sequoia Park* court introduced its opinion as resolving a pre-emption issue: "We conclude that the [Sonoma County] ordinance is expressly preempted....We further conclude that the [county's] ordinance is impliedly preempted because the Legislature, which has established a dominant role for the state in regulating

mobilehomes, has indicated its intent to forestall *local intrusion* into the particular terrain of mobilehome conversions, declining to expand section 66427.5 in ways that would authorize *local governments* to impose additional conditions or requirements for conversion approval." *Sequoia Park Associates v. County of Sonoma* (2009) 176 Cal.App.4th 1270, 1275 (emphasis added).

Misapplying *Sequoia Park, supra*, Palisades Bowl claims that if *Palisades Bowl* decision is allowed to stand, it will create a loophole such that local governments will be able to get around "exclusive application" of section 66427.5 through local ordinances which rest on other applicable state statutes. The *Palisades Bowl* court did nothing more than set forth well-recognized legal principles and apply them to the City of Los Angeles' local zoning issue. The Coastal Act and the Mello Act are state statutes that dictate the substance of what local governments must do when reviewing an application for subdivision and conversion of affordable housing units. These principles are so well established that Palisades Bowl never argued

that the Coastal Act applied to section 66427.5 conversions during the trial court litigation and the appellate court proceedings. [2]

The Coastal Act requires a developer to seek and obtain a coastal development permit from the local agency and dictates the specific criteria the local agency must apply in its consideration of the coastal development permit application. *Palisades Bowl, supra*, 187 Cal.App.4th at 1479, 1480. The Coastal Act authorizes a local government, like the City, to "establish procedures for the filing, processing, review, modification, approval or denial" of coastal development permits within its coastal zone. (Section 30600(b).) After a local government has established these procedures, permit jurisdiction transfers to the local government. Following a local government's implementation of a coastal development permit program, "any person wishing to perform a development shall obtain a coastal development permit from the local government." 14 CCR section 13301. The Coastal Act, having delegated permit authority to

[2] Gilchrist and Rutter write in their letter of support for the Petition for Review that the holding of *Palisades Bowl* contradicts the reasoning in *Sequoia Park* which notes that the legislative scheme governing mobilehome park conversions "would not be advanced if parochial interest were allowed to intrude." Underlying Gilchrist and Rutter's assertion is the apparent notion that the interests of the State as expressed in the Mello and Coastal Acts are really just local "parochial" interests. That position makes no sense in light of long established law and as set forth in the *Palisades Bowl* decision.

the City, in accordance with its 1978 election to adopt a local coastal program, requires the City to determine whether the project complies with all relevant policies of the California Coastal Act of 1976. Pub. Res. Code section 30604; *Palisades Bowl, supra*, 187 Cal.App.4th at 1480-1481.

The Mello Act mandates the local government to ensure affordable housing units for low and median income individuals and families are maintained in the coastal zone and sets forth the definition of the affordable housing to be preserved. That definition of affordable units to be protected includes mobilehomes in mobilehome parks. Government Code section 65590(g)(1); *Palisades Bowl, supra*, 187 Cal.App.4th at 1478.

Additionally, Palisades Bowl's claims that the *Palisades Bowl* decision would reverse the *Sequoia Park* holding that the General Plan Housing Element did not to apply to mobilehome park conversions are erroneous. The *Sequoia Park* court did not determine that Sonoma County deviated from Section 66427.5 by requiring applications to document compliance with "the goals and policies of the General Plan Housing Element..."as Palisades Bowl claims. (Petition, p. 10.) The *Sequoia Park* court did not discuss this portion

of the Sonoma Count ordinance in particular. Rather, Sequoia Park court's only mention of the General Plan Housing Element is in its verbatim reproduction of the entire Sonoma County ordinance. *Sequoia Park, supra*, 176 Cal.App.4th 1270, 1288-1292. Instead, central to its analysis that the Sonoma County ordinance was preempted was the fact that the ordinance mandated what state law forbids. *Id.* at 1299. The ordinance provided that a mobilehome park subdivision application could only be approved if, for example, it demonstrated that appropriate financial provision has been made to underwrite and ensure proper long-term management and maintenance of all common facilities and infrastructure, etc. *Id.*

IV. THE APPELLATE COURT CORRECTLY CONCLUDED THAT MELLO, COASTAL AND 66427.5 MUST APPLY TO PALISADES BOWL'S PROPOSED SUBDIVISON

A. THE PROPOSED SUBDIVISION IS A DEVELOPMENT PROJECT REQUIRING A COASTAL DEVELOPMENT PERMIT

Palisades Bowl claims its proposed subdivision is not a development project for purposes of the Coastal Act and therefore

does not require a coastal development permit because it does not effect a change in the density or intensity of the use. This argument ignores the Coastal Act's plain language, specifically its definition of development, as well as case law regarding the definition of development. Additionally, Palisades Bowl fails to cite to any case law interpreting "development" which supports its novel claim.

Public Resources Code section 30106 defines development as a "change in the density or intensity of use of land, including, but not limited to, subdivision pursuant to the Subdivision Map Act (commencing with Section 66410 of the Government Code), and any other division of land, including lot splits....."

The cardinal rule of the Coastal Act is that a developer must obtain a coastal development permit, either from the City or the Coastal Commission or both, for every development project in the Coastal Zone. As the Palisades Bowl panel pointed out,

> "A project that involves a subdivision under the Subdivision Map Act constitutes development for the purposes of the Coastal Act (Cf. *La Fe, Inc. v. County of Los Angeles* (1999) 73 Cal.App.4th 231, 240...["Section 30106 by its terms recognizes that a subdivision of land or lot

> split can result in changes in the density or intensity of use of property"].) There is no question that the conversion of a mobilehome park to resident ownership is a subdivision under the Subdivision Map Act....Thus, a mobilehome park conversion is a "development" for which a coastal development permit is required under the Coastal Act. (See *California Coastal Com. v. Quanta Investment Corp.* (1980) 113 Ca.App.3d 579...[holding that the conversion of existing apartment units into a stock cooperative form of ownership constitutes a development which falls within the permit jurisdiction of the various Coastal Commission sunder the California Coastal Act of 1976,])

Palisades Bowl, supra, 187 Cal.App.4th at 1481.

Contrary to Palisades Bowl's contention, the reasoning in *Quanta* is not moot. (Petition, p. 16.) It continues to be cited favorably. See e.g., *La Fe, Inc. v. County of Los Angeles* (1999), 73 Cal.App.4th 231, 240-242; *Gualala Festivals Committee, supra,* 183 Cal.App.4th at 67.

The Coastal Act provides an expansive definition of the activities that constitute "development" for purposes of the Act.

Gualala Festivals Committee v. Cal. Coastal Commission (2010) 183 Cal.App.4th 60, 67. The act's goals include protection of the coastline and its resources and maximization of public access. Another purpose is to "minimize the alteration of natural land forms." *La Fe, supra*, 73 Cal.App.4th at 235. The act is to be liberally construed to accomplish its purposes and objectives. *Id.*

In *La Fe, supra,* the court found that "development" for purposes of the Coastal Act included a lot line adjustment even though the adjustment did not create additional parcels. 73 Cal.App.4th at 240-242. "The Legislature's stated intent was to grant the commission permit jurisdiction with respect to any changes in the density or intensity of use of land, including any division of land. *Section 30106 by its terms recognizes that a subdivision of land or a lot split can result in changes in the density or intensity of use of property.*" *Id.* (emphasis added).[3] The court noted that Pub. Res. Code section 30106 explicitly applies to a 'subdivision...and any other division of land...' "The *key point* is that section 30106 applies

[3] In a footnote the court noted that the commission had found the proposed lot line adjustment changed the density and intensity of use of the land. *Id.*, fn. 4.

to a 'division of land' and that a lot line adjustment was such a division of land." *Id.* at 240 (emphasis added).

Palisade Bowl's theory that a mobilehome park conversion is not a development under the Coastal Act is not supported by case law or a plain reading of the statute. Taking this theory to its logical extreme would mean that air-space subdivisions of existing apartment buildings to condominiums, for example, do not change the density or intensity of use and therefore are excluded from operation of the Coastal Act. In any event, there is additional change in the density and intensity of use with a mobilehome park subdivision, as mobilehome owners may decide to move their mobilehomes out after the conversion and new owners may move their mobilehomes in.

B. THE LANGUAGE OF THE COASTAL ACT ITSELF DOES NOT PRECLUDE ITS APPLICATION TO MOBILEHOME PARK CONVERSIONS UNDER SECTION 66427.5 AS PALISADES BOWL NOW APPEARS TO ARGUE

Palisades Bowl also now appears to argue that the language of the Coastal Act itself limits local action involving mobilehome parks. (Petition, p. 18.) Not only is this contrary to its stance in all the proceedings below, but Palisades Bowl's new theory makes no sense.

Also contrary to Palisades Bowl's new interpretation, Public Resources Code section 30007 is a reaffirmation that local governments are still required to make provision for preserving low and median income housing in the coastal zone. As the Palisades Bowl panel determined, the Mello Act provides greater protections for low and median income housing than section 66427.5 and therefore its mandate must be applied to affected conversions. *Palisades Bowl, supra*, 187 Cal.App.4th at 1482-1484.

C. THE MELLO ACT MANDATES THAT THE CITY PRESERVE AFFORDABLE UNITS WHICH ARE TO BE CONVERTED

Palisades Bowl clearly ignores the plain language of the Mello Act which makes it applicable to conversions of mobilehomes in mobilehome parks. Palisades Bowl appears to claim that the following quotation: "[n]o provision of this section shall be construed as increasing or decreasing the authority of a local government to enact ordinances or to take any other action to ensure the continued affordability of housing" means that any state statute which limits a local agency's authority to maintain affordable housing supersedes the Mello Act's requirements. (Petition, pp. 20-21.) This claim makes no

sense. The plain language of the Mello Act, Government Code section 66590(i) merely says that the section *does not increase or decrease* a local government's authority to ensure the continued affordability of housing. Additionally, Palisades Bowl cites from section 65590(i), not section 65590(h), as it stated in the Petition.

Palisades Bowl's next argument that Gov. Code section 65590's applicability to conversions of mobilehome parks is actually limited by Section 65590(b) also makes no sense. Subsection (b) does not limit the scope of Section 65590, which provides that units, where a lower or moderate income family is no longer residing, may still be considered affordable units if a lower or moderate income family was evicted in the past year and for purposes of avoiding the requirements of Mello. Contrary to Palisades Bowl's interpretation, the phrase in subsection (b) shows the Legislature anticipated that some landowners would try to evade the requirements of the Act. The Legislature wanted to ensure landlords would not attempt to reduce the number of affordable units that needed to be maintained after a conversion by evicting lower and moderate income tenants immediately before the conversion.

V. CONCLUSION

For the reasons above, the City of Los Angeles respectfully requests that the Supreme Court deny the Petition for Review.

Dated: November 9, 2010

Respectfully submitted,

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CERTIFICATE OF COMPLIANCE

I certify that pursuant to California Rules of Court, Rule 8.204 (c) Counsel for Respondent certify that this Answer to Petition is produced using Times New Roman font, 14 point type size, and contains 3,505 words as counted by the word processing program.

Dated: November 9, 2010

Respectfully submitted,

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PROOF OF SERVICE

I, the undersigned, declare as follows:

I am over the age of 18 years, and not a party to this action. My business address is 700 City Hall East, 200 North Main Street, Los Angeles, California 90012.

On November 9, 2010, at my place of business at Los Angeles, California, a COPY of the attached **ANSWER TO PETITION FOR REVIEW** was placed in a sealed envelope addressed to:

SEE ATTACHED SERVICE LIST

BY MAIL - I deposited such envelope in the mail at Los Angeles, California, with First class postage thereon fully prepaid. I am readily familiar with the business practice for collection and processing of correspondence for mailing. Under that practice, it is deposited with the United States Postal Service on that same day, at Los Angeles, California, in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postage cancellation date or postage meter date is more than one (1) day after the date of deposit for mailing in affidavit.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

EXECUTED on November 9, 2010, at Los Angeles, California.

GUADALUPE LOPEZ

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