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IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA
IN AND FOR THE COUNTY OF LOS ANGELES, CENTRAL DISTRICT

YOUTH FOR ENVIRONMENTAL JUSTICE; SOUTH CENTRAL YOUTH LEADERSHIP COALITION; CENTER FOR BIOLOGICAL DIVERSITY,

Petitioners and Plaintiffs,

v.

CITY OF LOS ANGELES; CITY OF LOS ANGELES DEPARTMENT OF CITY PLANNING; MICHAEL J. LOGRANDE, in his official capacity as Director of Los Angeles Department of City Planning; DOES 1 through 20 inclusive,

Respondents and Defendants.

Case No. BC600373

MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT OF PLAINTIFFS/PETITIONERS' OPPOSITION TO MOTION FOR LEAVE TO INTERVENE BY CALIFORNIA INDEPENDENT PETROLEUM ASSOCIATION

Assigned: Hon. William F. Fahey
Date: April 25, 2016
Time: 9:30 AM
Dept.: 69

Case Filed: November 6, 2015
Trial Date: TBD

(*caption continued from cover page*)

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INTRODUCTION

The plaintiffs here (Youth for Environmental Justice, South Central Youth Leadership Coalition, and the Center for Biological Diversity) brought this action to challenge the City of Los Angeles's pattern and practice of rubber stamping oil-drilling applications in violation of the California Environmental Quality Act (CEQA). The City's practice of issuing blanket exemptions for oil-drilling activities not only contravenes CEQA's required case-by-case environmental review, but also results in less protective conditions for oil-drilling sites in neighborhoods that are overwhelmingly composed of people of color—thus violating the anti-discrimination mandates of Government Code section 11135 as well. This discriminatory pattern and practice, the plaintiffs allege, exposes these communities—and particularly young people like themselves—to substantial health and environmental risks.

To remedy those concerns, all that plaintiffs seek is declaratory and injunctive relief to bring the City into compliance with longstanding and well-settled state environmental and antidiscrimination laws. Speculating that the "unknown level of environmental review" for which the plaintiffs advocate will result in "the complete shut-down of modified or new oil-extraction projects," however, the California Independent Petroleum Association (CIPA), an oil-industry trade association, seeks leave to intervene in the action. This Court should deny that request.

First, CIPA is not entitled to intervention as a matter of right, because it has no "interest relating to the property or transaction which is the subject of the action," and "the disposition of the action" will not "as a practical matter impair or impede [its] ability to protect that interest." (Code Civ. Proc., § 387, subd. (b).) This action seeks to bring the process by which the City reviews oil-drilling applications into compliance with state law; it does not seek to set aside any particular permit or regulatory approval in which CIPA's members have a property interest. CIPA does not even attempt to articulate how its members' interests can be implicated by the plaintiffs' racial-discrimination claim.

And CIPA fails entirely to support its hyperbolic assertions (at 2) that this action could result in "uncertainty, delays and compliance costs [that] pose a direct threat to the financial interest of CIPA's members." CIPA's ability to protect its interests will not be impaired by the disposition of this lawsuit because it can bring separate challenges against any future regulatory actions implicating its property interests if and when such claims become ripe. In any event, the City can adequately represent CIPA's interests in this action.

Second, this Court should not permit CIPA to intervene under Code of Civil Procedure Section 387, subdivision (a). Permissive intervention requires that the proposed intervenor have a "direct and immediate interest" in the litigation; any interest CIPA claims here, by contrast, "is consequential and thus insufficient for intervention." (*City and Cnty. of S.F. v. State of Cal.* (2005) 128 Cal.App.4th 1030, 1037.) More importantly, permitting CIPA to intervene will "prolong, confuse [and] disrupt the present lawsuit." (*Simpson Redwood Co. v. State of Cal.* (1986) 196 Cal.App.3d 1192, 1203.) While the plaintiffs and the City have initiated efforts to amicably resolve this action, CIPA threatens any prospect of settlement by insisting on continued, adversarial litigation. Indeed, even though it is not a party to the action, CIPA has *already* filed unauthorized pleadings aiming to disturb agreements that the parties have reached in good faith. This Court should reject CIPA's brazen attempts to sidetrack this action on the basis of unsupported speculation about the lawsuit's ultimate effects, and deny its motion for leave to intervene.

ARGUMENT

I. CIPA is not entitled to intervention as a matter of right.

A. This action does not implicate the property interests of CIPA or its members.

CIPA fails to establish the most basic requirement for mandatory intervention: that it can "claim[] an interest relating to the property or transaction which is the subject of the action." (Code Civ. Proc., § 387, subd. (b).) That is because it has none. The "subject

of the action" is the *process* by which the City approves or disapproves permits for oil-drilling activities—not any particular approval, permit, or other regulatory action in which CIPA's members may have a property interest.

Mandatory intervention is proper only where the proposed intervenor has "a significantly protectable interest" in the property at issue in the action. (*Siena Court Homeowners Ass'n v. Green Valley Corp.* (2008) 164 Cal.App.4th 1416, 1424 (quoting *Donaldson v. United States* (1971) 400 U.S. 517, 531).) The cases CIPA itself cites (at 3), however, demonstrate that it has no such interest here. In *People ex rel. Dep't of Conservation v. El Dorado County* (2005) 36 Cal.4th 971, 981–82, for instance, mining-industry groups were granted leave to intervene in a lawsuit that sought to vacate *specific* regulatory approvals that allowed a mining company to operate two quarries allegedly in violation of state mining law. Likewise, *Sierra Club v. California Coastal Commission* (1979) 95 Cal.App.3d 495, 498, involved an action "to set aside a permit authorizing" the construction of a condominium development. The plaintiff had filed the "action against the regional commission and the commission . . . , but failed to include the developer." (*Id.* at p. 499.) The court concluded that the developer was an "indispensable party" to the action because "[t]he precise relief which plaintiff here sought . . . was to set aside [the developer's] permit to undertake certain construction," which "would directly affect, and undoubtedly injure, [the developer's] interests." (*Id.* at p. 501.)[1]

In all of these cases, intervention was appropriate because the lawsuit sought to set aside a specific permit or regulatory action—relief that would "undoubtedly injure" industry third parties who directly benefited from those specific actions. (CIPA in fact acknowledges as much, describing (at 5) the *Sierra Club* decision as concerning a

[1] CIPA also cites *Californians for Alternatives to Toxics v. Dep't of Food and Agriculture* (2005) 136 Cal.App.4th 1, 11, a case in which the court noted only in passing that wine-industry groups had been granted leave to intervene. In any event, that case involved a challenge to the Department's emergency program "call[ing] for the use of pesticides to control and eradicate" a disease threatening grapevines. (*Id.* at p. 5.) Setting aside that program would have had obvious and direct impacts on winegrowers' property interests in their grapevines.

"permittee whose permits would be cancelled" if the plaintiffs' action succeeded.) Here, by contrast, no particular regulatory action or permit is at issue, nor will the plaintiffs' action, if successful, cancel or otherwise affect any approvals already obtained by CIPA's members. Rather, the lawsuit aims to bring the City's future approval process into compliance with CEQA and antidiscrimination law. CIPA offers no precedent holding that such relief implicates an interest sufficient for purposes of mandatory intervention.

Recognizing that it lacks a cognizable "interest" in this action, CIPA resorts to unsupported assertions and alarmist speculation concerning the potential effects of the plaintiffs' action. CIPA asserts (at 1–2), for instance, that the plaintiffs seek to impose "sweeping requirements for an unknown level of environmental review," and that "the resulting uncertainty, delays, and compliance costs pose a direct threat to the financial interest of CIPA's members." And it goes so far to contend (at 5) that "Petitioners are proposing to change the game so significantly that even alterations to existing projects would be bogged down in endless environmental review."

The conclusions CIPA asks the court to draw require leaps of inferential logic. Its hyperbolic assertions fundamentally mischaracterize the plaintiffs' action and objectives—not to mention that they are entirely lacking in evidence. The present action seeks only that the City conduct "the required preliminary review analysis on a case-by-case basis to determine whether an application for a plan approval is subject to environmental review under CEQA and what level of environmental review is warranted"; that it apply categorical exemptions only when legally appropriate; and that it do so in a non-discriminatory fashion, as required by Government Code section 11135. Compl. 21–22, 35–39. CIPA makes no effort to demonstrate how *complying* with well-settled state environmental law could rise to "an unknown level of environmental review." Mot. 2. And CIPA's curious attacks (at 2) on the plaintiffs for "not identify[ing] any end-point of their proposed environmental review" similarly lack merit; the "end-point" of the review is simply what CEQA says it is in each given case. Once CIPA's

conclusory statements are put aside, it is clear that it has no property interests that will be directly affected by this action. Thus, it lacks any claim to intervene as a matter of right.

B. CIPA's ability to protect its interests will not be impaired or impeded by the disposition of this action.

Nor would CIPA members' ability to continue oil-drilling activities be impaired or impeded, as a practical matter, by the disposition of this action. For this reason, too, the Court should deny CIPA's request for mandatory intervention.

Again, CIPA relies (at 1–2) on speculative and overblown claims that their interests will be "immediately threatened by an outcome in this litigation favorable for Petitioners." And CIPA broadly asserts (at 5), without any evidence or detail, that "[w]ithout question, the environmental review envisioned by petitioners would undermine the ability of CIPA's members to protect their critical property interests in continued gas and oil operations." But nowhere do the plaintiffs suggest that they seek to shut down future permitting of oil-drilling projects in Los Angeles. Contrary to CIPA's hyperbole, the "environmental review envisioned by" the plaintiffs is simply that already required by state law. Nor does CIPA attempt to demonstrate *how* an outcome in plaintiffs' favor would "likely" result in the "complete shut-down of modified or new oil-extraction projects in Los Angeles." Mot. 1–2. And for good reason. To do so would require CIPA to, in effect, argue that proper compliance with state law would necessitate disapprovals of all oil-drilling activities in Los Angeles. And, notably, CIPA does not even attempt to argue that its interests are in any way implicated by the plaintiffs' claim under Government Code section 11135. Both CIPA and its members presumably have no interest that will be impaired by ending the racial discrimination that results from the City's deficient planning-approval process.

In any case, even if requiring appropriate CEQA review were to result in a reduction of approvals for CIPA's members—an outcome that CIPA has failed to substantiate—CIPA cannot establish that the disposition of *this* action will impair its

members' ability to continue oil drilling in Los Angeles. That is, if the plaintiffs succeed in this action, the City would be required only to conduct a nondiscriminatory, case-by-case review as required under CEQA and Government Code section 11135; the City's subsequent project-specific denials would then be the actions "impair[ing]" or "imped[ing]" CIPA members' property interests. Thus, as a practical matter, this action "will have no effect on [CIPA's] ability to protect its interest[s]" because it "may bring a separate action" at a later date to challenge those regulatory approvals. (*Siena Court*, *supra*, 164 Cal.App.4th at p. 1426; see also *Knight v. Alefosio* (1984) 158 Cal.App.3d 716, 727 [holding that "intervention was not justified" because proposed intervenor had no direct property or transactional interest in the action and "could pursue a separate action" to protect its interests].) Merely asserting, as CIPA does, that the relief sought in this action "would be devastating for CIPA's members" is not enough to establish the right to intervene. Otherwise, intervention standards would be rendered meaningless. Because CIPA has failed to meet its burden for intervention, *Olson v. Hopkins* (1969) 269 Cal.App.2d 638, 644, this Court should deny its motion.

C. The City will adequately represent CIPA's interests.

Even if CIPA had a cognizable "interest" in the action—which it does not—it would not be entitled to intervention as of right because its "interest[s] [are] adequately represented" by the City. (Code Civ. Proc., § 387, subd. (b).) Here, the City and CIPA have nearly identical interests—both will seek to demonstrate that the City's review process lawfully complies with CEQA and Government Code section 11135. This Court should reject CIPA's absurd arguments (at 7) to the contrary: that CIPA is entitled to intervene simply because it asserts that it has "private interests in the outcome of this case, while [the City] ha[s] public interests," and because the City does not "engage[] in oil extraction or conduct[] oil and gas operations." The upshot of CIPA's position is that private regulated entities are entitled to mandatory intervention in *every* case involving a regulatory agency—in effect, erasing Section 387's statutory requirements.

Moreover, CIPA invokes an inaccurate standard for meeting its burden on this factor, relying on outdated case law construing Federal Rule of Civil Procedure 24—the federal analogue to Section 387. CIPA asserts that its "burden of making [the adequate-representation] showing should be minimal." Mot. 6 (citing *Lewis v. Cnty. of Sacramento* (1990) 218 Cal.App.3d 214, 219). But CIPA entirely disregards more recent precedent, which holds that "a presumption of adequacy of representation" applies to cases in which the party and the proposed intervenor share the same "ultimate objective." (*Arakaki v. Cayetano* (9th Cir. 2003) 324 F.3d 1078, 1086.) Overcoming this presumption requires the proposed intervenor to make a "compelling showing" of inadequate representation—and where one party to the case is a government entity, the intervenor must make a "*very compelling* showing" that the state cannot adequately represent its interests. (*Id.* at 1086 (emphasis added); see also *State ex rel. Lockyer v. United States* (9th Cir. 2006) 450 F.3d 436, 443.)

CIPA's showing falls woefully short of meeting that standard. Indeed, it fails to articulate a single reason for why the City will not adequately represent its interests, aside from its unfounded assertion that state and city agencies categorically cannot represent the interests of private entities. That the City and CIPA may employ "divergent litigation tactics," as CIPA contends, is entirely irrelevant; mere "differences in strategy . . . are not enough to justify intervention as a matter of right." (*United States v. City of Los Angeles* (9th Cir. 2002) 288 F.3d 391, 402–03.) Nor can CIPA identify any case law that supports its position. The case it cites (at 7)—*Save Our Bay, Inc. v. San Diego Unified Port Dist.* (1996) 42 Cal.App.4th 686, 695–96—did not concern intervention at all, but joinder of an indispensable party under Code of Civil Procedure section 389, which (unlike section 387) does not ask whether the proposed intervenor's interests are adequately represented by existing parties. CIPA's reliance on that case is thus misplaced and must be rejected.

CIPA is finally left to contend (at 6–7) that, because it was granted the right to intervene in a prior case, it should be granted the right to intervene now. It fails to

mention that in two other cases involving environmental lawsuits against governmental entities, courts *rejected* oil-industry groups' arguments for mandatory intervention. In *Center for Biological Diversity v. California Department of Conservation, Division of Oil, Gas, and Geothermal Resources* ("*Center II*") (Alameda Cty. Sup. Ct. 2012) No. RG13-664534, for instance, the court rejected the Western States Petroleum Association's arguments for mandatory intervention, denying its motion to intervene entirely. (Order Denying Motion for Leave to Intervene, *Center II* [filed April 2, 2013].) And in *Center for Biological Diversity, et al. v. California Department. of Conservation, Division of Oil, Gas, and Geothermal Resources* ("*Center I*") (Alameda Cty. Sup. Ct. 2012) No. RG12-652054, the court permitted WSPA to intervene only as a matter of discretion under section 387, subdivision (a), implicitly rejecting its request for intervention as of right. (Order Granting Motion for Leave to Intervene, *Center I* [filed Feb. 28, 2013].)

In any event, whether CIPA can intervene depends on whether it can meet its burden of proof in satisfying section 387, subdivision (b)'s requirements in *this* action—not on arguments made in other cases. For all the reasons described above, it has failed to do that here, and this Court should therefore deny mandatory intervention.

II. This Court should deny CIPA's request for permissive intervention.

A trial court may permit intervention under Section 387, subdivision (a), where "(1) the intervener has a direct and immediate interest in the litigation, (2) the intervention will not enlarge the issues in the case, and (3) the reasons for intervention outweigh opposition by the existing parties." (*Hinton v. Beck* (2009) 176 Cal.App.4th 1378, 1382–83.) CIPA fails to establish even one of these requirements. Its interest in this litigation is, at most, consequential and speculative. And allowing CIPA to intervene in this action will enlarge, delay, and complicate the proceedings—indeed, its conduct so far in this litigation has already made that clear. "The right to intervene granted by section 387, subdivision (a), is not absolute"; "intervention is properly permitted only if the

requirements of the statute have been satisfied." (*Simpson Redwood*, *supra*, 196 Cal.App.3d at p. 1199.) Because CIPA has not satisfied those requirements, the Court should deny its request for permissive intervention.

A. CIPA does not have a "direct and immediate interest in the litigation."

To permit intervention, a court must find that the proposed intervenor has "a direct interest in the success of one of the parties to the litigation or an interest against both of them." (*Hodge v. Kirkpatrick Development, Inc.* (2005) 130 Cal.App.4th 540, 548.) "The requirement of a direct and immediate interest means that the interest must be of such a direct and immediate nature that the moving party will either gain or lose by the direct legal operation and effect of the judgment." (*City and County of S.F. v. State of California* (2005) 128 Cal.App.4th 1030, 1037 (internal citations and quotation marks omitted).) "Conversely, [a]n interest is consequential and thus insufficient for intervention when the action in which intervention is sought does not directly affect it although the results of the action may indirectly benefit or harm its owner." (*Ibid.*)

Although CIPA acknowledges these principles (at 8), it nevertheless argues that it satisfies the "direct and immediate" requirement because the "economic consequences of the uncertain but extensive environmental review prayed for by Petitioners would cause certain pecuniary harm to CIPA's members." That is incorrect, however, for all the reasons discussed above. At best, any interest CIPA has in this action is merely "consequential and thus insufficient for intervention." (*City and Count of S.F.*, *supra*, 128 Cal.App.4th at p. 1037.) As explained, CIPA and its members will not "gain or lose by the direct legal operation and effect of the judgment" if this action were resolved in the plaintiffs' favor, *ibid.*—all that plaintiffs seek is that the City afford oil-drilling conditional-use plans the level of case-by-case review required under state law. True, once the City adopts CEQA-compliant review processes, some similar approvals that may have been granted under its currently deficient regime may not be granted in the

future. But those harms are highly attenuated from the current action; they are nothing more than "indirect" effects.

Put simply, CIPA "does not identify any way in which the judgment in [this action] will, *of itself*, directly benefit or harm its members." (*Id.* at p. 1038 (emphasis in original).) Although CIPA claims (without any evidence) that requiring the City to comply with CEQA will result in a host of harms to its members, even CIPA concedes (at 8) that the ultimate effect of this relief sought by the plaintiffs "uncertain." That is just another way of saying that any effects of this action on CIPA's members are not "direct and immediate."

B. Intervention will enlarge the issues in the case, and both parties' opposition outweighs CIPA's reasons for intervention.

CIPA's motion should also be denied because its intervention will "open up other issues that have nothing to do with this particular [action]," *Siena Court*, *supra*, 164 Cal.App.4th at p. 1429, and will "prolong, confuse [and] disrupt the present lawsuit," *Simpson Redwood*, *supra*, 196 Cal.App.3d at p. 1203.

Indeed, even though CIPA has not yet been granted leave to intervene, it has already acted in a manner that suggests that its formal intervention will "delay the litigation [and] change the position of the parties." (*Id.* at p. 1202.) For example, the plaintiffs and the City agreed that this case should be designated complex under Rule 3.400 *et seq.*, in light of the fact that the claims will entail numerous motions raising "difficult" and "time-consuming" questions, judicial management of a "large number of witnesses" and "a substantial amount of documentary evidence," and, potentially, "[s]ubstantial postjudgment judicial supervision." (See Plaintiffs' Mot. to Designate Case as Complex, at 1.) The plaintiffs and the City accordingly stipulated to that effect, and Judge Chalfant thereafter ordered the matter transferred to Complex Court. Despite the parties' agreement as to the complex designation, however, CIPA has since filed several motions and pleadings arguing that the case should be declared *not* complex. CIPA's pre-

intervention conduct, in other words, has *already* expanded the issues in this case, by transforming unanimity over the complex designation into an adversarial—and possibly lengthy—procedural dispute.

What's more, the plaintiffs and the City have agreed to pursue efforts to amicably resolve the plaintiffs' claims. To that end, the parties stipulated to stay discovery and motions practice to enter mediation, and Judge Chalfant vacated all scheduled hearings after a status conference with the parties to allow those discussions to continue. Despite these developments, CIPA re-noticed its previously filed motion for leave to intervene, thus forcing the parties to continue to file pleadings and litigate procedural disputes. This Court should not allow CIPA to derail the prospect of settlement (or any other amicable resolution of the plaintiffs' claims) by its insistence on continued litigation.

And permitting CIPA to intervene will likely enlarge the issues in this action in other respects. For instance, the plaintiffs' allegations concern the City's general failure to follow the CEQA "three-tiered process," Compl. 31, and do not challenge any particular oil-drilling approvals, projects, or sites. Notwithstanding CIPA's contention (at 9) that its intervention will "not affect the nature of the action," it likely will shift the action's focus toward its members' specific projects, as well as how specific projects or members might be affected sometime in the future if the City adopted CEQA-compliant review procedures. And CIPA's complaint-in-intervention further demonstrates that CIPA's participation will require assessment of additional issues; for example, CIPA suggests in its complaint (at 1) that it will raise questions concerning their members' possible "financial injury," a factually intensive inquiry likely "requir[ing] introduction of additional evidence," *Simpson Redwood*, supra, 196 Cal.App.3d at p. 1202—and an issue that would otherwise not have been raised by either party in the present action. This Court should reject CIPA's attempts to take control of and redirect this litigation, particularly when, as described above, the disposition of this action will have no direct impact on its interests.

As a general matter, courts are to respect the rights of the "original parties to conduct their lawsuit on their own terms." (*People ex rel. Rominger v. County of Trinity* (1983) 147 Cal.App.3d 655, 661.) Accordingly, intervention must be denied if the "reasons for intervention are outweighed by the right of the original parties to litigate in their own manner." (*Id.* at 664.) Indeed, "even when a direct interest is shown," a trial court should deny intervention where "the interests of the original litigants outweigh the intervenors' concerns." (*People v. Superior Court (Good)* (1976) 17 Cal.3d 732, 737.)

That is true here. In contrast to CIPA's vague and unsubstantiated allegations of harm, the plaintiffs have credibly alleged that they have been subjected to significant "public health and safety risks posed by oil drilling in residential neighborhoods," and that "those most vulnerable to the health hazards associated with oil drilling are young people of color and those in low-income communities, who are already more likely to live in neighborhoods facing a disproportionate share of environmental risk." (Compl. 10, 13.) These significant—and ongoing—harms far "outweigh" the speculative and consequential interests that CIPA asserts will be affected by this action. (*Good*, *supra*, at p. 737.) Thus, this Court should deny CIPA's motion for leave to intervene in its entirety.

DATED: April 12, 2016

Respectfully submitted,

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