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SUPREME COURT, STATE OF COLORADO
2 East 14th Ave.
Denver, Colorado 80203

ORIGINAL PROCEEDING PURSUANT TO §1-40-107(2), C.R.S. (2006)
Appeal from the Ballot Title Setting Board

Petitioners:
Michael A. Bowman and Douglas B.Monger, Objectors,

v.

Respondents:
William G. Mohram, Jr. and Betty S. LaMont, Proponents,

and

Title Board:
WILLIAM A. HOBBS, JASON DUNN, and DAN CARTIN

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Case Number: 06SA113

ANSWER BRIEF OF WILLIAM G. MOHRAM, JR. AND BETTY S. LAMONT

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I. Summary of Argument

This Court should uphold the title as crafted by the Title Board. First, this Court grants great deference to the Title Board, because that entity must often conduct a difficult balancing test to create titles that are clear, fair, accurate, and brief. A title should only be returned to the Title Board if it is clearly misleading.

The Title Board properly excluded a detailed definition of "land use regulation," because the title explicitly refers to both legislative and quasi-judicial actions. The term "land use regulation" is not unusual or misleading, and courts have construed the term broadly to include both legislative and quasi-judicial governmental action.

For many of the same reasons, the Title Board correctly declined to include a detailed definition of "public entity." That term closely mimics current Colorado law defining governments and political subdivisions, and the title properly informs voters that the measure affects only those public entities that enact or enforce land use regulations that can affect property.

The Title Board also correctly decided to omit detailed – but limited – provisions applying to current regulations. This Court has never required a different ballot title standard for initiatives that apply to laws already in place, and in fact the title language indicates that the measure will apply retroactively to

current laws. The provisions affecting current regulations are not significant, and accordingly the current ballot title is not clearly misleading. To fairly summarize the details would create a lengthy and complex title. The Title Board correctly decided to create a brief title that fairly informs voters of the initiative's main features.

Finally, the Title Board is not required to list each and every exception to the measure's general thrust, nor is the Title Board required to list how the exceptions apply. The exceptions themselves do not depart from current law, and excluding them does not create a clearly misleading title. The petitioners themselves argue that the exceptions are rendered insignificant by their implementation provisions, and accordingly their argument cannot justify including the exceptions in the title.

II. Argument

A. Standard of Review

This Court rightfully grants "great deference to the board's broad discretion in the exercise of its drafting authority."[1] Accordingly, "[a]ll legitimate

[1] *In re Proposed Initiative concerning State Pers. Sys.*, 691 P.2d 1121, 1125 (Colo. 1984).

presumptions are to be drawn in favor of the propriety of the board's action when considering challenges to titles, submission clauses or summaries."[2]

By statute, the Title Board must set titles that are not misleading or unclear.[3] At the same time, ballot titles must be brief.[4] Often, these two requirements – brevity and clarity – create tension with one another, thus requiring the Title Board to "resolv[e] the interrelated problems of length, complexity, and clarity in designating a title and submission clause."[5] Recognizing the central role of the Title Board in this process, the Court has recognized its limited role in reviewing ballot title and submission clauses:

> It is not our function to rewrite the titles and summary to achieve the best possible statement of the proposed measure's intent. We will reverse the Board's action in setting the titles only when the language chosen is clearly misleading. Moreover, the summary is not intended to fully educate people on all aspects of the proposed law, and it need not set out in detail every aspect of the initiative."[6]

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[2] *State Pers. Sys.*, 691 P.2d at 1123.

[3] C.R.S. § 1-40-105(3).

[4] *Id.*

[5] *In re Matter of Title, Ballot Title and Submission Clause, and Summary Pertaining to Proposed Tobacco Tax Amendment 1994*, 872 P.2d 689, 694 (Colo. 1994) (quotation omitted).

[6] *In re Title, Ballot Title and Submission Clause, and Summary For 1999-2000 No.255*, 4 P.3d 485, 496 (Colo. 2000).

As discussed below, the title and submission clause set by the board are not clearly misleading.

B. The Title Board was within its discretion to omit a detailed definition of the term "land use regulation."

Petitioners (collectively referred to as "Bowman") argue that the Title Board should have included the definition of the term "land use regulation" because the "ballot measure fundamentally alters the reach of the law through the meaning given to essential terms."[7] Bowman's claim fails, however, because the title is not clearly misleading, and because the initiative uses the term "land use regulation" as commonly understood.

Bowman argues that the term "land use regulation" only includes legislative determinations and not "an adjudicative decision to condition petitioner's application for a building permit on an individual parcel."[8] Bowman creates a distinction between public entities acting in their quasi-judicial capacity and public entities acting in their legislative capacity. He further argues that this distinction is critical, and then argues that the title is misleading because it does

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[7] *Opening Brief* at 7.

[8] *Opening Brief* at 12.

not inform voters that the initiative includes regulations akin to adjudicatory decisions.

A simple review of the ballot title shows that it is not misleading. The title expressly states that the measure applies to a public entity that "enacts or ***enforces*** land use regulations."[9] Accordingly, voters reading the title or submission clause will immediately understand that the provisions apply to any enforcement action that reduces the value of private real property by 20% or more. The term "enforces" reasonably includes any quasi-judicial action that applies a legislative determination to a specific parcel of property. Indeed, the Title Board included this provision at Bowman's request.[10] In short, the Title Board's decision to include the term "enforces" as part of the ballot language removes Bowman's argument that the title clearly misleads voters.

For a ballot title to include a detailed definition, the defined term must "adopt a new or controversial legal standard which would be of significance to all concerned with the issues."[11] Bowman does not allege that the initiative creates a

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[9] Title, Proposed Initiative 2005-2006 No.86 (emphasis added).

[10] *Motion for Rehearing* at 1. Proponents did not object to the request.

[11] *In re Title, Ballot Title and Submission Clause, and Summary Adopted February 3, 1993, pertaining to the Proposed Election Reform Amendment*, 852 P.2d 28, 34 (Colo. 1993).

controversial standard. Nor is the definition of "land use regulation" new. In arguing otherwise, Bowman creates a false distinction between a legislative act and a quasi-judicial act. No such distinction exists. Both types of governmental action regulate land use, and both types of governmental action can reduce the value of real property. The term "land use regulation" has a common-sense meaning that includes governmental actions that may functionally reduce the value of property. Furthermore, both the United States Supreme Court and the Colorado Supreme Court have rejected Bowman's artificial distinction. The United States Supreme court has explicitly rejected such categorical distinctions in determining which types of land-use regulations reduce the value of private property. In *Tahoe-Sierra Preservation Council, Inc. v. Tahoe Regional Planning Agency* the court rejected any set formula, stating:

> we have generally eschewed any set formula for determining how far is too far, choosing instead to engage in essentially ad hoc, factual inquiries. Indeed, we still resist the temptation to adopt per se rules in our cases involving partial regulatory takings, preferring to examine a number of factors rather than a simple mathematically precise formula.[12]

Recognizing that restrictions on land use do not fit into neat "legislative" and "quasi-judicial" categories, the United States Supreme Court has taken a

[12] *Tahoe-Sierra Preservation Council, Inc. v. Tahoe Reg'l Planning Agency*, 535 U.S. 302, 326-7 (2002) (quotations and citations omitted).

functional approach, applying a Fifth Amendment takings analysis to a variety of governmental actions that affect land. For example, in *Dolan v. Tigard*, the Court analyzed the validity of a "city's permit conditions" that required the landowner to dedicate land to a bicycle pathway.[13] In that case, the Court recognized that conditioning the grant of a permit functioned the same as a simple requirement that the landowner convey property.[14] Likewise, in *Nollan v. California Coastal Comm'n* [15] the Court reviewed the imposition of a condition during the permitting process – a process that Bowman characterizes as "quasi-judicial."[16]

Finally, this Court has taken a functional approach and broadly construed the term "land use regulation." In *Animas Valley Sand and Gravel, Inc. v. Board of County Com'rs of County of La Plata*, this Court granted certiorari on the issue of "Whether, in analyzing a portion of property to determine if a land use regulation results in a 'taking,' the court must consider the impact of the challenged action on the property as a whole."[17] In its opinion, the Court treated

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[13] *Dolan v. Tigard*, 512 U.S. 374, 388 (1994).

[14] *Dolan v. Tigard*, 512 U.S. 374, 384 (1994).

[15] *Nollan v. Cal. Coastal Comm'n*, 483 U.S. 825, 828-9 (1987).

[16] *Opening Brief* at 10.

[17] *Animas Valley Sand and Gravel, Inc. v. Bd. of County Comm'rs of La Plata*, 38 P.3d 59, 62 n. 2 (Colo. 2001).

this reference to a "land use regulation" as "regulatory interference" or "burden of regulation."[18] This approach recognizes that governmental regulations can take a wide variety of forms, including permit approvals (or denials), moratoria,[19] and other exercises of governmental authority.

C. The proposed initiative's use of the term "public entity" is not new or controversial.

Bowman claims that the title is misleading, because it does not fully define the term "public entity."[20] This argument suffers several flaws. First, the initiative's definition of the term "public entity" does not depart from what voters normally believe constitute public entities. Under Bowman's reasoning, the title should carefully define "public entity," because that term includes the state, special districts, law enforcement agencies, school districts, and housing authorities. Yet Colorado currently defines "government" to include "any political subdivision of the state and any agency or department of the state government.[21] Likewise, the term "political subdivision" includes:

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[18] *Id.*

[19] *Tahoe*, 535 U.S. at 306.

[20] *Opening Brief* at 13.

[21] C.R.S. § 29-1-202(1).

> a county, city and county, city, town, service authority, school district, local improvement district, law enforcement authority, city or county housing authority, or water, sanitation, fire protection, metropolitan, irrigation, drainage, or other special district, or any other kind of municipal, quasi-municipal, or public corporation.[22]

"Public entity" as used by the initiative is nearly identical to the current legal definitions of "government" and "political subdivision." Thus, Colorado law already includes in the term "government" and "political subdivision" every single type of entity that Bowman believes should be explicitly included in the title. Furthermore, it is completely reasonable for voters to read the term "public entity" and conclude that it includes "governments" and "political subdivisions." Finally, the Title Board need not include definitions, even if those definitions are broader than common usage in some respects and narrower in others."[23]

Second, Bowman erroneously assumes that the title is clearly misleading because the definition of the term "public entity" is not limited to entities commonly associated with land use regulations. But both the measure and the ballot title clearly state that the measure only affects a public entity "***if*** a public entity enacts or enforces land use regulations."[24] Thus, the title itself makes the

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[22] C.R.S. § 29-1-202(2).

[23] *See Proposed Election Reform Amendment*, 852 P.2d at 34.

[24] Title, Proposed Initiative 2005-2006 No. 86 (emphasis added).

functional connection between public entities and land use regulations. It is not necessary to explain "public entity" because the title itself explicitly limits its application to public entities that enact or enforce land use regulations. An explanation by the Title Board that certain public entities do not normally enact land use regulations would not only be redundant, but it would also be irrelevant.

Even if Bowman were correct in arguing that the term "public entity" clearly misleads voters because the term is not limited to entities normally associated with land use regulations, his argument fails because each of his examples is inaccurate or contradictory. First, he claims that voters do not look to the state for land use regulations. But this ignores important state laws that specifically limit counties from placing certain land use regulations on parcels 35 acres or larger.[25] Second, Bowman argues that enforcement authorities are not associated with land use regulation.[26] But in the next sentence he provides a common example of how law enforcement authorities affect property. Third, Bowman claims that school districts can trigger the measure by locating a facility near a property. But this argument misreads the proposed measure, which limits itself to land use regulations "that affect ownership of, or an interest in, real

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[25] *See, e.g.* C.R.S. §§ 30-28-101, 110, 302, 403, and 404.

[26] *Opening Brief* at 14.

property."[27] Construction near a piece of property is not a land use regulation that affects ownership of, or an interest in, real property.

In short, Bowman (1) fails to consider Colorado's common definitions associated with public entity, (2) ignores the title's careful statement that the measure only applies to public entities that enact or enforce land use regulations, and (3) cannot support his argument that the term "public entity" improperly includes certain governments or political subdivisions.

D. The Title Board correctly omitted detailed provisions of the measure's application to current or past laws.

The Title Board ballot title need not detail how the measure applies to past regulations, because the title is not currently misleading. This Court has rejected such challenges in the past, the title indicates retroactive application, and the title would balloon in length and complexity if it were to accurately summarize the limited application to regulations enacted prior to 1970.

In two instances, this Court has rejected title challenges despite claims of retroactivity. In *In the Matter of Title, Ballot Title, Submission Clause, and Summary Adopted March 20, 1996, By the Title Bd. Pertaining to Proposed Initiative 1996-6*, the title contained no indication of the retroactive nature of the

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[27] Proposed Colo. Const. art. II, § 15(2)(c)(3).

measure, but the ballot summary recognized the retroactive application of the measure. This Court nonetheless upheld the title as set by the Title Board.[28]

In a second case, this Court readily recognized that an initiative had no limitations on its retroactive application. Nonetheless, the Court refused to overrule the Title Board and include any specific language outlining the retroactive application, holding that "[b]ecause there [was] no indication that the proponents desired any limitation on retroactive application, adding such language would not serve the initiative's intent."[29] Although the ballot title did not state that the measure applied retroactively, the Court nonetheless upheld the ballot title.[30]

In contrast to the other ballot titles, the ballot title in this case indicates to voters that the measure will apply to regulations enacted prior to the date of the initiative. The title states that the measure applies to a public entity that "enforces" land use regulations. The term "enforce" means an action separate from, and subsequent to, passage of an ordinance. Because the title uses "enforces"

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[28] *In the Matter of the Title, Ballot Title, Submission Clause, and Summary Adopted March 20, 1996, By the Title Bd. Pertaining to Proposed Initiative 1996-6*, 917 P.2d 1277, 1282-3 (Colo. 1996).

[29] *In the Matter of the Title, Ballot Title and Submission Clause and Summary Pertaining to Confidentiality of Adoption Records and Petition for Rehearing Denied in Part on April 3, 1992*, 832 P.2d 229, 232 (Colo. 1992).

[30] *Id.*

separately from "enacts," the title properly conveys to voters that the measure may affect ordinances already in place. Indeed, Bowman's counsel explicitly recognized this during argument before the Title Board, when he stated that the term "enforces" "signals . . . that this measure is going to apply not just to newly enacted land use regulations defined in the measure."[31]

Finally, the manner in which the initiative applies to ordinances or legislation already in place is limited in scope, but complex in application. The Title Board correctly excluded the complex details in order to create a brief and clear title. In order to include the measure's application to current laws, the Title Board would be required accurately summarize the following:

- Under no circumstances does the initiative apply to enactments prior to 1970.[32]
- If an enactment occurred after 1970, the measure only applies to current owners (as defined in the measure) who (1) acquired the land before the land use regulation and (2) have continuously owned the land.[33]

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[31] Hearing Transcript, 17:14-16.

[32] Proposed Colo. Const. art. II, § 15(2)(a)(I).

[33] Proposed Colo. Const. art. II, § 15(2)(a)(II)

- After five years following the measure's effective date, any claims based on ***enacted*** legislation prior to the measure are extinguished, but those regulations characterized as "enforcement" are not extinguished.[34]

Collectively, these restrictions greatly restrict the measure's application to a small group of landowners who have continuously owned the land, and who lose certain (but not all) causes of action five years after the measure's effective date. The ballot title is not clearly misleading as it now stands, because the narrow application of these rules do not significantly impact the overall thrust of the measure. Accordingly, the title need not contain the complex rules that create this limited application.

E. The ballot title and submission clause need not detail each exception.

Currently, the title set by the Title Board does not list the exceptions contained in the initiative. Although Bowman claims that the Title Board's decision to omit each exception is deficient,[35] he provides no reasons. Rather, his argument is that the exceptions are shams, and therefore the ballot title should

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[34] Proposed Colo. Const. art. II, § 15(2)(b)(II).

[35] *Opening Brief* at 17.

include the exceptions and then also explain how the exceptions are more apparent than real.[36]

Taken on its face, Bowman's argument cannot support overturning the Title Board's decision. Bowman argues that the exceptions are meaningless "shams." If this were the case, then the Title Board would have been correct in excluding them from the title, if only because the exceptions constitute a minor, insignificant part of the initiative. Thus, even if this Court agrees with Bowman's reasoning, his reasoning does not justify cluttering the ballot title by listing several exceptions and then explaining that the exceptions do not matter anyway.

Bowman's claim also fails because the Title Board is not required to list the exceptions to enforce federal law, protect public health and safety, or abate common nuisances. A ballot title must list provisions that create a "sham" only in the most extreme cases. For example, in *In the Matter of the Title, Ballot Title and Submission Clause for Proposed Initiatives 2001-2002 No. 21 and No. 22 ("English Language and Education")*, this Court concluded that the various requirements for parental-waiver "tend[ed] to overwhelm and obscure the inevitable outcome of the waiver process when all of the provisions [were]

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[36] *Opening Brief* at 18.

properly taken into account."[37] Bowman's argument does not come close to this standard.

First, excluding these exceptions is not clearly misleading. Voters reading the title initiative fully understand the main thrust of the initiative, which is to require compensation when governmental regulatory burdens reach a certain threshold. There is no indication that the exceptions will overwhelm the central feature of the initiative – they do not change this general thrust, and they may ultimately prove to be insignificant. Furthermore, the exceptions themselves are not unusual. The United States Supreme Court has long recognized that regulations to abate common law nuisances, or to protect the health and safety of citizens, have not been considered a regulatory taking.[38] Furthermore, the exception for federal regulations simply reflects the recognition that the state constitution cannot override federal law.

Second, it is within the Title Board's discretion to exclude a measure's exceptions. The Title Board need not and cannot describe every feature of a

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[37] *In the Matter of the Title, Ballot Title and Submission Clause for Proposed Initiatives 2001-2002 No. 21 and No. 22 ("English Language and Education")*, 44 P.3d 213, 221 (Colo. 2002).

[38] *See, e.g. Penn. Cent. Transp. Co. v. City of New York*, 438 U.S. 104, 144-145 (1978).

proposed measure, and to require the title to include each and every exception (and further explain how the exceptions are invoked) would "transform what the General Assembly intended – a relatively brief and plain statement by the Board setting forth the central features of the initiative for the voters – into an item-by-item paraphrase of the proposed constitutional amendment or statutory provision."[39] Indeed, in *In re Proposed Initiative Concerning State Personnel System* this Court rejected a similar challenge that demanded a ballot title define the exemptions in a measure.[40]

Finally, Bowman erroneously argues that the exceptions are shams. He complains about the clear-and-convincing evidentiary standard, but this is a well-known legal standard used regularly in civil proceedings. Prior to statutory clarification, Colorado common law contained numerous examples where an assertion required clear and convincing evidence, such as: an entitlement to real estate sale commission; establishing elements of fraud: determining the intent to abandon water rights; dismissal of an action under the teacher tenure act;

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[39] *In the Matter of the Title, Ballot Title and Submission Clause, and Summary for 1997-98 No. 62*, 961 P.2d 1077, 1083 (Colo. 1998).

[40] *State Pers. Sys.*, 691 P.2d at 1123-4.

challenging property tax assessment; or establishment of a mining claim.[41] None of these actions were "sham" actions merely because they required clear and convincing evidence.

Likewise, it is not unusual for a "clear and convincing" standard to be required in civil actions involving property[42] or provisions that affect constitutional rights.[43] This initiative does both. It creates a fundamental property right in the Colorado constitution.

Furthermore, Bowman complains that a public entity may not meet one of the exceptions – the public health and safety exception – by making a self-serving factual finding. The initiative does nothing unusual. It merely requires a public entity to submit evidence to a court. And *de novo* review by an appellate court does not transform an exception into a "sham."

In short, Bowman's claims fail on both legal and factual grounds. With respect to the exceptions, "the board is not required to and, in this case, clearly cannot describe every feature of a proposed measure in the titles."[44]

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[41] *Gerner v. Sullivan*, 768 P.2d 701, 703-4 (Colo. 1989) (citations omitted).

[42] *Gerner*, 768 P.2d at 704-5.

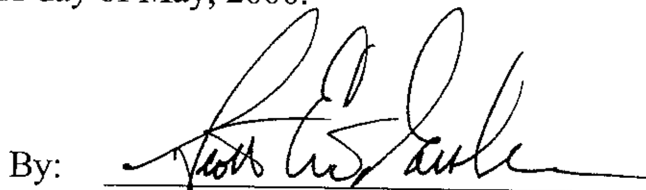
[43] *Diversified Mgmt., Inc. v. Denver Post, Inc.*, 653 P.2d 1103, 1108 (Colo. 1982).

[44] *Proposed Election Reform Amendment*, 852 P.2d at 33.

III. Conclusion

Respondents Mohrman and LeMont respectfully request that this court deny the petition and affirm the ballot title as set by the Title board.

Respectfully submitted this 22nd day of May, 2006.

By: 

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CERTIFICATE OF SERVICE

I certify that on this 22nd day of May, 2006 the foregoing **ANSWER BRIEF OF WILLIAM G. MOHRAM, JR. AND BETTY S. LAMONT** was served on all parties and other interested persons via hand delivery addressed to the following:

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