STATE OF MICHIGAN
IN THE SUPREME COURT
(ON APPEAL FROM THE MICHIGAN COURT OF APPEALS)

LAKESHORE GROUP AND ITS MEMBERS, LAKESHORE CHRISTIAN CAMPING, CHARLES ZOLPER, JANE UNDERWOOD, LUCIE HOYT, WILLIAM REININGA, KEN ALTMAN, DAWN SCHUMANN & MARJORIE SCHUHAM,
Petitioners-Appellants,

v.

DUNE RIDGE SA, LP, and MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY,
Respondents-Appellees.

Supreme Court No. 159524 & 159525

Court of Appeals No. 340623 & 340647

Ingham Circuit Ct. No. 17-176-AA

MAHS Docket 14-026236

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PETITIONERS-APPELLANTS' REPLY TO DUNE RIDGE

*****ORAL ARGUMENT REQUESTED*****

PROOF OF SERVICE

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REPLY TO DUNE RIDGE

Introduction

Appellants reply separately to the opposition briefs of Dune Ridge and MDEQ. This reply is to Dune Ridge's arguments.

Before addressing several specific points Dune Ridge makes, it may be helpful to begin by responding to how they mischaracterize what this case is about. Petitioners-Appellants' purpose is at the core of this case and Dune Ridge tries to avoid petitioners' real concerns by characterizing the relief sought by petitioners as their wishing not to live next to property being developed by Dune Ridge. Dune Ridge ("DR") Brief at 19 & 20. Their point seems to be, "we sold that property so there can be no further concern." But petitioners' concerns were always about the "proposed uses" across the whole 130-acre property. Dune Ridge's technique is comparable to its approach to legal argument throughout its brief, arguing based upon misstatements of fact.[1] Petitioners

[1] See, for example, discussion below concerning some of the following Dune Ridge arguments that are not based on what actually happened in the record: (1) Dune Ridge argues *res judicata* bars the Hoyt and Reininga intervention, DR Brief at ix, 1, 3, 5, 20 & 25, even though there was no subsequent action – Petitioners' intervention was into the same, pending action in which Shorewood was one of three petitioners; (2) Dune Ridge argues MEPA intervention is barred on the ground that there must be an existing proceeding, DR Brief at 6 & 29-30, when in fact there was, *see. e.g.*, caption and first paragraph of Exhibit C to Application, ALJ Opinion and Order dated October 28, 2015 ("Consolidated Cases"; two of three parties dismissed September 10, 2015); (3) Dune Ridge offers the same cases it has relied on before (which DEQ acknowledges do not address petitioner's retention of standing where only the respondent makes a change), DR Brief at 15, to argue *respondent can divest* petitioner of standing *where the cases involve plaintiffs who do not satisfy* standing criteria; (4) Dune Ridge acknowledges the standing provision of §35305(1) should be interpreted in the context of Part 353 as a whole, DR Brief at 10-13, but then addresses only a small part of the statute and ignores its emphasis on local citizen involvement; and (5) Dune Ridge inaccurately claims we argue and the Circuit Court ruled that someone with standing cannot lose it. DR Brief at viii, 5, 16. Perhaps most importantly, Dune Ridge argues about applying rules of statutory interpretation to the Part 353 standing provision but avoids addressing the fact that the ALJ accurately ruled that some petitioners satisfied that provision. *Compare* DR Brief at vii ("did not have standing"); Exhibit C to Application, at 3 (ALJ decision that four have statutory standing).

submit that this technique makes plain the weakness of their case. If they could have made a legitimate argument based upon the facts, they would have done so.

Ultimately, Dune Ridge seeks complete avoidance of any contested case hearing to review the MDEQ permit review process for the developer's creation of a 20-home gated community in what had been a bucolic church camp for a century prior to the developer's purchase of the 130 acres of statutorily-protected sand dunes. That conclusion – no contested case hearing whatsoever despite the APA, MCL 24.201 *et seq.,* and the constitutional mandate for judicial review of final agency decisions – is the true practical effect of the erroneous decisions in the Court of Appeals decision rejecting every basis for standing; and that is the goal Dune Ridge seeks to achieve.[2]

I. What Purpose Does this Contested Case Proceeding Serve?

Dune Ridge engages in misdirection as to what Petitioners-Appellants' purpose was (and is) and suggests that its sale of land addresses their concerns. DR Brief at 19-20. But the focus of the permits and the reason for the contested case were never about what might happen with or on the small areas of property sold by Dune Ridge. The sale next to Ms. Underwood, for example, was of land that is too steep to be developed; getting paid to give it to Oval Beach Park was a "win" for the Dune Ridge developers because it had no development potential whatsoever. And, most importantly, Ms. Underwood's focus in the contested case was on the MDEQ-permitted "proposed uses" taking place along the shoreline and in the back dunes throughout the property, such as the paving of roads and driveways, destruction of plant life and habitat to clear areas for home sites, and construction of water supply utilities and septic fields across the property.[3]

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[2] The lengths to which Dune Ridge has gone to avoid judicial review make one wonder why the review of the Dune Ridge permits must be avoided at such cost.

[3] Ms. Underwood's property is *still* "immediately adjacent" in the following sense: It is kitty-corner from and immediately across Perryman Street from the rest of the 130-acre development property. See maps at Exhibit K.

Dune Ridge seeks to avoid dealing with the substance of this case by offering this Court the idea that the petitioners' concerns were not with the development, not with the MDEQ permits, not with the alterations to the dunes at issue in the contested case, but rather in something completely different that was never at issue, namely what might or might not happen outside the scope of the permits for the proposed uses in the "buffer" area Dune Ridge had no plan to develop. This buffer does not insulate the permits from review.[4] As the ALJ ruled with regard to an issue that was never appealed by any party, it would undermine the purpose of Part 353 to allow the developer to insulate itself and its permits from contested case review by creating a buffer. Exhibit C to Application at 4 (to "only confer[] standing . . . if the proposed use is on the border of parcels . . . would impermissibly limit an adjoining property owner's right to a contested case"). Having gotten it right once, the ALJ was wrong not to see that the later sale of slivers of land not involved in the proposed uses was nothing more than creation of an artificial buffer. The sale did not have to be intended or done for the purpose of blocking the contested case in order for that result to be wrong; in fact, petitioners have clearly stated they have never objected to the sales themselves. Rather, it is respondent's *attempt to use the sales* of irrelevant property not at issue in the contested case to evade having a hearing on the permits that is objectionable.[5] Dune Ridge's opposition to this application for leave to appeal maintains an undercurrent of irrelevancies that distracts from the true issues by purporting to make the property that was sold an issue when it never was.

Consider the subject matter of the contested case hearing. The focus is the permits. See citations to permits in the administrative record in the Application statement of facts. The permits

[4] And the buffer area was never the focus of the contested case. The focus was on both the proposed uses and MDEQ's conduct reviewing and making decisions on which uses would be permitted.

[5] And that is what the circuit court correctly found to be a brazen effort to evade review. Circuit Court decision, Application Exhibit B at 6 ("Dune Ridge's attempts to eliminate Appellants' standing are brazen, bad-faith efforts to circumvent the administrative review process").

provide MDEQ's approval to alter the dunes in substantial ways to prepare 8-9 housing lots along the shore of Lake Michigan and another 10 or so in the upper dunes, to widen and pave a century-old single lane, unpaved road – in the process cutting through steep dune slopes, to remove many old trees and clear undergrowth and habitat to open up building sites, to cut through more slopes, to pave new driveways and to install septic tanks and drain fields to prepare for the permanent disposal on-site of septage from numerous homes and guest houses. In other words, one type of inquiry for the hearing will be whether these actions and their collective scope is allowable under the terms of Part 353. *See also*, Reply to MDEQ. The two parcels sold by respondent have nothing to do with these issues about the "proposed uses" at issue in the hearing.

Another area of inquiry in the contested case hearing will be MDEQ's review of the permit application. Did it require the applicant/respondent to provide complete information? MCL 324.35304(1)(a). Did it make decisions based upon "the most comprehensive . . . scientific data available"? MCL 324.35302(b)(iii). Did it evaluate this commercial project of multiple housing units over 50-100 of the 130 acres as a special use project – and therefore require an environmental impact statement for the project at a whole? MCL 324.35301(j) & .353017(3). Consideration of these lines of inquiry and evaluation of the evidence at the contested case hearing[6] have nothing to do with the pieces of property sold. Those sales did not alter the issues in the contested case and certainly had nothing to do with the concerns or the standing of Petitioners because the "proposed uses" at issue were never on those pieces of the overall property.

[6] The contested case process involves the procedural preparations for and conduct of a quasi-judicial hearing by the administrative law judge, including the taking of evidence from all parties and their experts. The ALJ then prepares a draft decision upon which the parties may comment. That decision goes to the director of the agency, who then makes a final administrative decision on the permits. That decision is appealable to the circuit court. MCL 324.35305(2).

Respondent Dune Ridge's mischaracterizations appear designed to avoid having light shined on the real issue here through misdirection, perhaps to lead the Court down the blind path of the argument that the case is moot (because they no longer own the property?) when in fact the issues of concern and Petitioners' relationship to those concerns – the "proposed uses" – remain identical to when the petitions were first filed and they first intervened and were granted standing. The ALJ and Court of Appeals errors must be overturned with a remand for a full contested case hearing.

II. When Does a Petitioner who has Standing Lose that Standing?

The Dune Ridge discussion on statutory standing largely ignores the fact that Lakeshore's group members were found to meet the statutory criteria and the only real issue here is *whether they lost standing*. On this issue, the Court of Appeals decision is clearly erroneous and will cause material injustice as the result is the complete denial of contested case (and subsequent judicial) review, contrary to the legislative intent expressed in §35305(1 & 2).

The ALJ initially ruled on motions to intervene into three consolidated contested cases and held that four individuals had standing because they satisfied the "immediately adjacent" statutory standard of §35305(1). *See* Application at 18ff and Exhibit C.[7]

The ALJ then mistakenly allowed two property sales to create (unowned) buffers by mistakenly focusing on the fact that Dune Ridge no longer owned the portions of its 130-acre property adjacent to the petitioners while ignoring the fact that *the statute focuses* not on the

[7] As noted above, the ALJ also held that Dune Ridge's attempt to thwart the contested case process with a "buffer defense" had to be rejected as that would undermine Part 353. See Application at 19 and ALJ decision at Exhibit C. The parties' property locations in the same dunes are depicted on Exhibit K. For a lengthy scientific analysis of the interrelationships among the many phases and regions of active areas of sand dunes in Michigan, see Cowles, *The Ecological Relations of the Vegetation on the Sand Dunes of Lake Michigan (1899)*, included in the administrative record at AR 877ff.

developer's ownership but rather *on the developer's "proposed uses."* The ALJ's error was in failing to stand firm and protect the integrity of the contested case process by ignoring the absence of any change in either the proposed uses or the petitioners' relationship to those uses, with the obvious conclusion that petitioners' standing under §35305(1) was unaffected by these inconsequential sales. The effect of the ALJ's errors on standing was the dismissal of the contested case, leading to these appeals.

Dune Ridge wrongly claims that petitioners argue (and that the Circuit Court held) that one can *never* revisit standing, DR Brief at viii, 5, and 16 ("The Court of Appeals correctly rejected the Circuit Court's ruling that statutory standing may *only* be 'determined at the time of filing'"), but that is not true. The point is that, while a petitioner could lose or give up his or her standing, *this change in circumstance – that the developer sold some land* – does not divest a petitioner of standing. The Circuit Court found there was an improper ("brazen") attempt to divest Petitioners of standing when Dune Ridge used its irrelevant land sales to block the contested case process. The Court did not say one cannot lose standing in other circumstances or that standing could not be reviewed as a case proceeds. Exhibit B at 5 ("Standing . . . may be raised at any time"). This Court should uphold the decision of the Circuit Court as a correctly stated decision that was properly based on precedent and the facts of this case. What occurred here with the developer's sales of property where no "proposed use" was involved did not affect the standing of petitioners.[8]

[8] Petitioners have never argued and do not now argue that standing cannot be lost. The focus of petitioners' standing was the whole development and none of the permitted actions at issue were located on the property that was later sold; the limited property sales had no effect whatsoever on the relationship between the petitioners and the conduct at issue. This situation is entirely different from that in *Street R Co of E Saginaw v Wildman*, 58 Mich 286 (1885) cited by Dune Ridge. In that case, the defendant's actions made the whole case moot. In this case, where Petitioners met the statutory standard for standing, two sales of irrelevant property should have no effect on Petitioners' standing and the contested case review process.

III. The §35305(1) Criterion for Part 353 Standing to Proceed to a Contested Case Hearing Focuses on the "Proposed Use"

The statutory standard, "owner of property immediately adjacent to the *proposed* use," MCL 324.35305(1), evinces a legislative focus on one's relationship to permitted changes to the dunes as defined at a "proposed" stage. To argue after the fact that someone with standing loses that standing because of actions the developer takes later that do not alter the "proposed uses" under review would be contrary to this legislative criterion for standing. *Huggett v DNR*, 464 Mich 711, 721, 629 NW2d 915 (2001) ("every word of a statute should be read in such a way as to be given meaning").

Dune Ridge also acknowledges one must look at the statute as a whole but then ignores the statute's focus on local participation. *See* DR Brief at 10 & 12, focusing on the statutory emphasis on balancing private uses and the public interest. Dune Ridge ignores the fact that the statute also emphasizes the interests and involvement of local citizens. Application at 29-31. Dune Ridge supports its avoidance of the overall statutory scheme by proposing to apply the *expressio* adage to reject Petitioners outright. DR Brief at 11. The better application of the adage is to consider the statutory provision in the *context of the statute as a whole*. *See* Application at 28-29.

IV. *Slatterly* Supports the Conclusion that Hoyt & Reininga are "Owners"

Dune Ridge's arguments opposing the standing of Hoyt and Reininga ignore the fact that, as Appellants already explained, the parts of *Slatterly* they rely on were (A) focused on the statute only (without the association bylaws) and (B) not the ultimate holding of the case, which supports the conclusion that Hoyt and Reininga are indeed "owners." *See* Application at 31-37 (under the

bylaws, the shareholder has the right to exclude others). Dune Ridge ignores the effect of the bylaws on Hoyt and Reininga's exclusive right to live in the home. *Compare* DR Brief at 22.[9]

Finally, Dune Ridge's *res judicata* argument fails. The doctrine is inapplicable because Hoyt and Reininga intervened into the same, pending action in which the Shorewood Association was a party along with two other petitioners. Application at 33 and Exhibit C. While the association was later dismissed, these petitioners did not intervene into a subsequent action but the same one. The doctrine of *res judicata* is simply not applicable in these circumstances as it applies in *subsequent* actions. *See* DR Brief at 25 ("The doctrine of res judicata bars a subsequent action . . ."). Moreover, it is well-established that shareholders may have individual issues separate and apart from those a corporation may have an interest in, and shareholders may act individually to protect their individual interests. *See, e.g., Schaffer v Universal Rundle Corp*., 397 F2d 893, 896 (1968) (referring to the right of an individual to bring an action where the duty is owed to the shareholder personally).

V. The ALJ and the Court of Appeals Erroneously Rejected MEPA Intervention

Just as Dune Ridge seeks to apply *res judicata* despite the fact that intervention was into a pending action, the same facts make Dune Ridge's effort to bar MEPA intervention an error. There *was a pending administrative proceeding* when petitioners moved to intervene under MEPA. *See* Application at 38-42. It was error for the ALJ not to allow intervention because he

[9] Appellants repeat our offer, should the Court wish to see decisions briefed on "owner" status based upon holding equitable title, to address cases in which the courts ruled lending institutions were liable as owners of property based only on their holding equitable title to real property as security for loans. This practice was common in both the state and federal courts until rules were enacted to exempt lenders – not because their equitable title did not make them owners but because a policy was promoted that their status should not result in Superfund liability. This additional argument should not be needed as the plain meaning of "owner" according to the dictionary resolves the issue. *See* Reply to MDEQ.

rejected MEPA's application in the proceeding and Dune Ridge now seeks to reinforce that error. A citizen's right to use MEPA to intervene in a pending administrative action involves a legal principle of major significance to the state's jurisprudence. To deny it as Dune Ridge asks would invalidate the MEPA intervention provision. MCL 324.1705(1). Petitioners respectfully ask this Court to exercise its discretion in this *de novo* review of standing and grant intervention for all Lakeshore Group members under this statutory authorization.

VI. Michigan's Common Law of Standing Supplements Statutory Standing

Dune Ridge also asks this Court to reject all common law standing in contested cases. Petitioners-Appellants have focused the issue narrowly: The existence of a statutory standing basis for some but not all persons leaves open the question of common law standing for the others who do not satisfy the statutory grounds for standing. *See Lansing Schools Educ Assoc'n v Lansing Bd of Educ*, 487 Mich 349, 792 NW2d 686 (2010). This Court may interpret its precedent as appellants argue (that *any* statutory standing means there can be *no* common law standing for anyone else), but that would be contrary to the *Lansing Schools* decision itself where the teachers were granted common law standing despite their not being recognized in the statute at issue in that case as having standing to challenge school expulsion decisions. *See generally*, Application at 42-50.

Conclusion

Dune Ridge's arguments that Lakeshore Group[10] and its members should not be allowed to be heard in a contested case regarding the proposed uses in these permits must fail. Dune Ridge

[10] Dune Ridge purports to "preserve its right to appeal" the standing of the Group. DR Brief at 27, fn 8. Petitioners respectfully object to this assertion of an appellate right. At no time did Dune Ridge express an intention to appeal or include an argument to appeal this issue of the Group's representative standing based on the standing of one of its members. See ALJ decision dated July 7, 2016, Exhibit E to Application at 5. Dune Ridge has not preserved the right to appeal this decision. Moreover, the ALJ decision shows that the representative standing of a group is well-established. *Id*.

asks this Court to apply cases where a plaintiff or petitioner never had standing or gave up the basis of its standing and now hold that respondent can divest a petitioner of standing by taking an action totally unrelated to the subject matter of the contested case proceeding and having nothing to do with the "proposed uses" that MDEQ approved. Dune Ridge repeatedly argues from facts it contends are the case here but which, upon further review, do not accurately reflect the real facts of this case.[11]

In the end, Dune Ridge even mischaracterizes Petitioners' interests and goals in an apparent effort to make it seem the focus always was on the small parcels Dune Ridge sold. In fact, those properties never were at issue in any way; their sale had no effect on these Petitioners' interest or standing and was erroneously used to deny standing and to avoid entirely any contested case hearing pursuant to the APA and Michigan's constitution.

Petitioners respectfully request that this Court grant the relief sought in the Application.

Respectfully Submitted,

Date: June 20, 2019

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[11] Examples are numerous and include the erroneous claims that standing was sought after Shorewood Association was dismissed and that MEPA intervention was sought when there was no pending administrative proceeding. *See* footnote 1, *supra*.

Index of Exhibits filed with Application

Exhibit	Document
A	Court of Appeals' unpublished decision dated March 21, 2019
B	Circuit Court decision dated September 28, 2017
C	ALJ Opinion and Order dated October 28, 2015
D	ALJ Opinion and Order dated January 26, 2016
E	ALJ Opinion and Order dated July 7, 2016
F	ALJ Opinion and Order dated February 13, 2017
G	The Michigan Environmental Protection Act, MEPA, MCL 324.1701 *et seq.*
H	The Sand Dunes Protection and Management Act, Part 353, MCL 324.35301 *et seq.*
I	"A List of Common Activities Needing a Permit," from MDEQ's web site
J	ALJ Opinion and Order dated December 16, 2014
K	Two maps from AR 0137 and 0902
L	Map of Dune Ridge development locations from AR 0061
M	Unpublished decision in *Cramer v State*, 2005 Mich App LEXIS 2512 (2005)

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PLAINTIFFS-APPELLANTS' APPLICATION FOR LEAVE TO APPEAL

*****ORAL ARGUMENT REQUESTED*****

PROOF OF SERVICE

On this date I have caused to be served a copy of this Reply to Dune Ridge and Proof of Service on counsel noted above using the Truefiling system.

Respectfully Submitted,

Date: June 20, 2019

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