

# **Bond Case Briefs**

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## **SURPLUS LAND ACT - CALIFORNIA**

### **Airport Business Center v. City of Santa Rosa**

**Court of Appeal, First District, California - November 26, 2025 - 2025 WL 3295545**

Property owner filed petition for writ of mandate against city and city council, challenging city's resolution declaring city-owned parking garage to be surplus land under the Surplus Land Act.

The Superior Court denied the petition. Owner appealed.

The Court of Appeal held that:

- As matter of first impression, determination that city-owned asset constitutes surplus land under the Surplus Land Act does not require agency to find that land is of no use to public;
- Substantial evidence supported city's determination that land constituted surplus land within meaning of the Act; and
- City's resolution declaring property to be surplus land satisfied Act's requirements that land would be declared surplus land "as supported by written findings."