

****Title:****

Barrio Balagbag of Pasay City Neighborhood Association, Inc. v. Office of the President and the Manila International Airport Authority

****Facts:****

The Petitioner, Barrio Balagbag of Pasay City Neighborhood Association, Inc. (a non-stock domestic corporation), represents the residents of land in Barrio Balagbag, San Roque, and Maricaban, Pasay City covered by Transfer Certificate of Title (TCT) No. 6735 under the Manila International Airport Authority (MIAA). The case centers on the interplay of three presidential proclamations affecting these lands:

1. ****Proclamation No. 144 (January 18, 2002)**** - Issued by President Gloria Macapagal-Arroyo to segregate land from the principal parcel under TCT No. 6735, allowing it to be available for disposition to qualified applicants under Act No. 3038 in relation to Commonwealth Act No. 141.
2. ****Proclamation No. 391 (May 28, 2003)**** - Amended Proc. No. 144 to state that the Housing and Urban Development Coordinating Council (HUDCC) and the National Housing Authority (NHA), in coordination with the MIAA, would administer and dispose of the lots for socialized housing per Republic Act No. 7279 (Urban Development and Housing Act of 1992).
3. ****Proclamation No. 1027 (March 6, 2006)**** - Further reduced the lands made available by Proc. No. 144 by segregating portions for MIAA's retention.

The petitioner, reacting to Proc. No. 1027, filed a Petition for Declaratory Relief on May 4, 2006, against the Office of the President (OP) and MIAA, arguing that Proc. No. 1027:

- Undermines their residency and supposed rights under Proc. No. 144.
- Nullifies their efforts and investments under Proc. No. 144.

Both respondents filed their answers, with OP asserting presidential prerogative and MIAA questioning the petitioner's locus standi. The Regional Trial Court (RTC) dismissed the petition for lack of merit on June 29, 2015. The Court of Appeals (CA) upheld the RTC decision on November 21, 2016, and denied the Motion for Reconsideration on March 2, 2017. Subsequently, the petitioner filed an appeal with the Supreme Court.

****Issues:****

1. ****Whether the members of the petitioner association are qualified beneficiaries under the government's socialized housing program.****
2. ****Whether there exists an actual justiciable controversy or its ripening seeds between the**

parties.**

Court's Decision:

The Court denied the petition, affirming the lower courts' rulings.

1. **Qualification of Beneficiaries:**

- The petitioner argued that its members were qualified beneficiaries under Proc. No. 144 for the socialized housing program.
- The Court held that the President, under the Public Land Act (C.A. No. 141) and the Administrative Code of 1987, has the authority to classify, reserve, and reclassify public lands. The Court emphasized that any public land disposition by the President is a lawful exercise of executive function which cannot be opposed if it serves public interest.

2. **Justiciable Controversy:**

- **Existence of a Justiciable Controversy:**
 - The Court found that there was no actual justiciable controversy as the Proclamations were merely executive actions regarding land reclassification and reservations.
 - The need demonstrated by the petitioner's members did not suffice to invalidate the President's classification powers, nor is their residency a justiciable right without specific procedural completion as mandated by Proc. No. 144.
- **Doctrine of Ripening Seeds:**
 - The petitioner claimed their actions under Proc. No. 144 established "ripening seeds" of controversy.
 - The Court ruled otherwise, reasoning Procs. No. 391 and No. 1027, were reasonable exercises of executive authority related to land reclassification.

Doctrine:

- **Regalian Doctrine:** All lands of the public domain are owned by the State. Only the State, through proper executive action, can dispose of such lands.
- **Presidential Authority in Public Land Classification:** The President has inherent power to classify, reserve, reclassify lands of the public domain, as sanctioned by both the Public Land Act and the Administrative Code.

Class Notes:

- **Key Elements:**
 - **Public Domain Lands:** Governed and held by the State under Regalian Doctrine.
 - **Presidential Prerogative:** Authority to classify, reserve, and reclassify lands.

- **Declaratory Relief Requirements:**

1. Subject matter involving a statute or executive order.
2. Doubtful terms requiring judicial construction.
3. No breach of the document in question.
4. Presence of actual justiciable controversy.
5. Issue ripe for judicial determination.
6. Adequate relief unavailable through other means.

- **Statutory Provisions:**

- **Section 1, Rule 63, Rules of Court:** Who may file a petition for declaratory relief.
- **C.A. No. 141, Sections 8 and 9:** Presidential powers in classifying, reserving, and reclassifying lands.

Historical Background:

The controversy arose during the early 2000s, reflecting the government's efforts, particularly under President Gloria Macapagal-Arroyo, to address urban housing issues and airport operational needs, invoking executive powers to realign land use priorities amidst growing informal settlements.