

# LOS ANGELES COUNTY DEPARTMENT OF REGIONAL PLANNING

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March 25, 2025

The Honorable Board of Supervisors  
County of Los Angeles  
383 Kenneth Hahn Hall of Administration  
500 West Temple Street  
Los Angeles, CA 90012

Dear Supervisors:

**PROJECT NO. 2018-003069-(5)  
CONDITIONAL USE PERMIT NO. 2018004676  
VARIANCE NO. 2018004861  
APPLICANT: BUNGEE AMERICA, INC.  
PROJECT LOCATION: ASSESSOR'S PARCEL NUMBERS 8678-002-015  
AND 8678-002-016  
ANTELOPE VALLEY PLANNING AREA  
(FIFTH SUPERVISORIAL DISTRICT) (3-VOTES)**

## **SUBJECT**

This item is an appeal of the Regional Planning Commission's (Commission) decision to approve a Conditional Use Permit (CUP) authorizing an existing amusement ride (bungee jumping), a private heliport, and overnight camping with appurtenant facilities (a container used as a hangar to store a helicopter, two storage containers, a storage building, an office, a security booth, a restroom building with composting toilets, a removable shade canopy, a directional/informational sign, and fencing) (Project) and to approve a Variance to waive the parking requirements for the Project. The Project location is commonly called the Bridge to Nowhere, which is on a private inholding consisting of Assessor's Parcel Numbers 8678-002-015 and 8768-002-016 within the Angeles National Forest (Project Site). The Commission approved the CUP and Variance on September 11, 2024, and this appeal of the Commission's decision was filed by Mitchell Tsai, representing Save the East Fork Association (Appellant), on September 25, 2024.

**IT IS RECOMMENDED THAT THE BOARD AFTER THE PUBLIC HEARING,**

1. Close the public hearing for Project No. 2018-003069-(5), consisting of CUP No. 2018004676 and Variance No. 2018004861.
2. Find that the Project is categorically exempt from the California Environmental Quality Act (CEQA) for the reasons stated in this Board Letter and in the record of the Project.
3. Indicate its intent to deny the appeal of the Commission's approval and instruct County Counsel to prepare the necessary findings to uphold the Commission's approval of the Project.

**PURPOSE/JUSTIFICATION OF RECOMMENDED ACTION**

The Appellant cites concerns regarding the following Project issues:

1. The Project Site has severe fire risks which are not mitigated.
2. The heliport would operate without proper permitting.
3. The CEQA exemptions are improper.
4. The Project has clear environmental impacts which must be studied and mitigated.
5. The Variance is unsupported by County findings.

Regarding the Appellant's first concern, while the Project Site is in a Very High Fire Hazard Severity Zone, as is everything for miles around in all directions, this fact was taken into account during the Fire Department's review of the Project. The Fire Department requires review and approval of the building materials used at the Project Site to ensure that they do not pose a fire hazard and that the continued operation of the use authorized by the CUP will not create new or additional fire risks that require mitigation measures or further consideration by the Fire Department.

Regarding the Appellant's second concern, the California Department of Transportation (Caltrans) has broad authority to regulate the establishment of heliports in California, as authorized by the State Aeronautics Act (California Public Utility Code (PUC) Section 21001 et. seq.). The Board of Supervisors (Board) has the authority to approve plans for the development of heliports within its jurisdiction pursuant to PUC Section 21661.5(a) and the Board's approval is required prior to the issuance of a Heliport Permit by Caltrans.

The heliport associated with the Project requires a CUP, and the CUP approved by the Commission includes the heliport. Additionally, the heliport associated with the Project requires

a Minor Aviation Permit, which must be approved by Department of Regional Planning (Department) Staff (Staff), on behalf the Airport Land Use Commission (ALUC), and then by the Board pursuant to PUC 21661.5(a). Prior to the Board's public hearing, Staff reviewed the heliport associated with the Project for consistency with the County Airport Land Use Plan (ALUP) and approved Minor Aviation Permit No. RPPL2024005958 (Minor Aviation Permit). The Project Site is not located within the planning boundaries established by the ALUP. The nearest airport, Cable Airport, is more than 11 miles to the southeast, in the City of Upland. Furthermore, Staff determined that the heliport will not have a significant effect on any public use airport located in the County and will not impact surrounding properties.

If the Board takes the recommended action, County Counsel will prepare the necessary findings, which will return to the Board for final action as a consent item. After the Board's final approval of the CUP that includes the heliport, the Department will ask the Board to approve the Minor Aviation Permit as a consent item. After the Board approves the Minor Aviation Permit, the applicant, Bungee America, Inc. ("Applicant"), will be required to obtain a permit for the heliport from Caltrans. Caltrans requires the County to approve the heliport before they can issue a permit for it.

Regarding the Appellant's third and fourth concerns, the Commission found that the Project is categorically exempt from CEQA (Class 1 - Existing Facilities, Class 3 - New Construction or Conversion of Small Structures, Class 5 - Minor Alterations in Land Use Limitations, and Class 23 - Normal Operations of Facilities for Public Gatherings) pursuant to State and local CEQA guidelines before they approved the CUP and Variance.

The CEQA exemptions are proper and appropriate for the Project. An important consideration for analyzing projects under CEQA is the project baseline determination. The Project baseline is generally based on the conditions that exist at the time the environmental review process for a project begins. The CUP and Variance applications for this Project were submitted in 2018, which was when the environmental review process for this Project began. The years 2013 to 2015 were used as this Project's baseline under CEQA because these are the years for which visitor logs have been provided, and these visitor numbers are considered representative of the use as it existed at the time the environmental review process for this Project began. Under CEQA generally, the project baseline is based on the use as it existed at the time the environmental evaluation began, even if the use was not legally established.

The Applicant prepared a draft Initial Study and supporting information that were analyzed by Staff to assess the impacts of the Project to the environment. Impacts to the environment under CEQA are measured based on the existing impacts established under the project baseline. Although the Project will result in some impacts to the environment, Staff's analysis found that the impacts would not be significant, as there would be no increase in the number of visitors established by the Project baseline. The Project also incorporates additional requirements, such as the new composting toilet system, which will process human waste in a more efficient and environmentally sensitive way than human waste is currently processed at the Project Site.

The new solar panels will also result in a reduction of impacts in comparison to the Project baseline, as it will enable renewable energy produced on site to be used for the Project. The overall impacts of the Project will therefore be reduced in comparison to the established Project baseline.

The Class 1, Existing Facilities Categorical Exemption covers the existing facilities at the Project Site. The Class 3, New Construction or Conversion of Small Structures Categorical Exemption covers the proposed new facilities, which are small in size and fall well below the allowable area of a Class 3 Categorical Exemption. The modifications to the existing structures are minor in nature and in areas that have been previously disturbed. The Class 5, Minor Alterations in Land Use Limitations Categorical Exemption covers the Variance for the parking requirements. The Class 23, Normal Operations of Facilities for Public Gatherings, Categorical Exemption is appropriate for the amusement ride use. There is a past history of the existing use at this location going back to 1989, and the use has operated with an excellent safety record. The California Department of Industrial Relations' Division of Occupational Safety and Health (DOSH) has issued permits for the use annually since 1993. Although the use did not receive approval from the County until the approval of the CUP and Variance in 2024, it has a long history on the Project Site, as reflected in the permits from DOSH over a period of more than 30 years, and the Applicant is not proposing any and significant changes in the Project's operations.

The Appellant contends that Class 3 and Class 5 categorical exemptions are not appropriate for the Project due to an exception to these exemptions in CEQA Guidelines Section 15300.2 that is related to a project's location within a designated, precisely mapped, and officially adopted environmental resource area. This Project Site is located within the Angeles National Forest, the San Gabriel Mountains National Monument, and the Sheep Mountain Wilderness, but these are not considered designated, precisely mapped, and officially adopted environmental resource areas. Instead, designated, precisely mapped, and officially adopted environmental resource areas include other areas, such as a Significant Ecological Area (SEA) adopted by the County or a Critical Habitat area adopted by the United States Fish and Wildlife Service (USFWS). The Project Site is not located within an SEA. The Project Site includes areas designated as Critical Habitat by the USFWS, primarily the area of the San Gabriel River Canyon. However, no new development is proposed within the designated Critical Habitat area. A portion of the existing Bridge to Nowhere is the only development on the Project Site that is located within the designated Critical Habitat area. The Bridge to Nowhere predates the designation as Critical Habitat area. The trailhead parking area and the adjacent portion of Camp Bonita Road are not located within an SEA or with a designated Critical Habitat area.

Regarding the Appellant's fifth concern, they contend that a Variance is not the proper vehicle to determine the required parking because County Code Section 22.112.070.C (Required Parking Spaces – Uses Not Specified) states that the amount of required parking for uses that are not specified in County Code Section 22.112.070.B (Required Parking Spaces – Required Parking Spaces Outside of Public Transit Areas) shall be determined by the Director of Regional

Planning (Director) and not by the Commission. The Appellant's contention is based on a misunderstanding of the County Code. While it is correct that the Director determines the amount of required parking, the Director does not have the authority to waive the parking requirements through a Variance. County Code Section 22.194.030 (Variances – Application and Review Procedures) states that a Variance application shall be processed in compliance with County Code Chapter 22.230 (Type III Review – Discretionary) and County Code Section 22.230.020 (Type III Review – Review Authority) states that the Review Authority for a Variance application is the Commission or the Hearing Officer, not the Director. In this circumstance, the Director determined the amount of required parking for the Project and then the Commission waived the parking requirements for the Project through a Variance, in compliance with the County Code. The Appellant also states that the Variance is unsupported by County findings. However, the Commission's Findings No. 25 to 29 address and support the Variance.

Due to the above reasons, the Department recommends the Board indicate its intent to deny the appeal of the Commission's approval of the Project and instruct County Counsel to prepare the necessary findings to uphold the Commission's approval.

Separately from the Department's recommendation, the Applicant has submitted a response to the appeal, which is Attachment 2.

### **Implementation of Strategic Plan Goals**

Approval of the Project promotes County Strategic Plan North Star 1 – Make Investments That Transform Lives, Focus Area B – Employment and Sustainable Wages, Strategy III – Job Creation. This goal of Focus Area B is to “Support social mobility, economic and workforce development, job training, meaningful connections, and access to employment opportunities with sustainable wages for County residents, with emphasis on those who are experiencing barriers to employment or the ability to earn a sustainable wage. Support small and large business growth to maintain job supply.” Bungee America is a small business in the tourism and recreation sector, which is an important part of the regional economy. Bungee America provides employment opportunities, including employing military veterans, and it helps its employees to develop useful job skills and meaningful social connections.

Approval of the Project also promotes County Strategic Plan North Star 2 – Foster Vibrant and Resilient Communities, Focus Area A – Public Health, Strategy I – Population Based Health; Focus Area D – Sustainability, Strategy III – Natural Resources; and Focus Area F – Community Connections, Strategy I – Engagement. Regarding Focus Area A, the requested use includes bungee jumping and hiking, which are activities that provide physical exercise opportunities within a designated National Forest, contributing to health and fitness for both County residents and visitors. This use has had an excellent safety record and provides opportunities for healthy and safe recreational activities. Regarding Focus Area D, the proposed composting toilet will provide a more sustainable means of waste disposal than the current outhouse, allowing human solid waste to be safely and sustainably composted on the Project Site. The CUP conditions

of approval contain requirements to ensure that the composting toilets will continue functioning properly. Regarding Focus Area F, this use provides opportunities to develop community connections by acting as a welcoming and accessible space where residents and visitors can access opportunities and can build relationships, create social networks, and feel connected.

### **FISCAL IMPACT/FINANCING**

The County may be subject to litigation whether the appeal is approved or denied. It is unknown at this time what the potential fiscal impact would be to the Department, which will have to bear the cost of defending the Board's decision.

### **FACTS AND PROVISIONS/LEGAL REQUIREMENTS**

On September 11, 2024, the Commission held a duly-noticed public hearing regarding the Project. Staff gave a presentation about the Project and recommended approval. Aaron Clark and Ron Jones, representing the Applicant, gave a presentation about the Project and provided additional information regarding the Applicant's stewardship of the environment at the Project Site and along the trail leading to it, including ongoing efforts to remove litter and graffiti and to protect the environment of the area. Mr. Jones also requested modifications to two draft conditions of Project approval. These modifications were to increase the CUP's grant term to 30 years and to reduce the frequency of inspections of the composting toilets to once every two years, rather than annually, after the inspection that will take place six months after composting toilet system installation. The Commission approved the request to increase the CUP's grant term to 30 years and increased the amount of the inspection fee deposit to cover additional inspections during the longer grant term. The Commission did not approve the request to reduce the frequency of the required inspections for the composting toilets.

An additional 26 speakers testified. 25 speakers testified in support, and they spoke about the Project's benefits. One speaker testified in opposition, and he raised concerns regarding the Variance request and parking issues at the trailhead, potential impacts to the Sheep Mountain Wilderness Area, and the need for an outfitter/guide permit issued by the United States Forest Service.

As a separate matter, Staff also recommended a revised motion that would direct Staff to schedule the Project's heliport for consideration by the ALUC in a separate public hearing. Although the CUP included the Project's heliport, Staff determined that the heliport would also require an Aviation Permit, and that the Aviation Permit would require approval by the ALUC and then by the Board. Upon further review after the public hearing, Staff determined that the heliport required a Minor Aviation Permit, which must be approved by Staff on behalf of the ALUC without a public hearing, instead of a Major Aviation Permit, which must be approved by the ALUC in a public hearing.

After a brief discussion, a motion was made to close the public hearing and find that the Project is categorically exempt from CEQA. The Commission approved the motion by a vote of 5-0. A second motion was made to approve the CUP and Variance with the requested modification to Conditions of Project Approval No. 7 and No. 9, resulting in a CUP grant term of 30 years with the commensurate additional inspections and higher inspection fee deposit, but without the requested modification to Condition of Project Approval No. 31, resulting in annual composting toilet inspections after the inspection that will take place six months after composting toilet system installation, as originally recommended by Staff. The second motion also directed Staff to schedule the Project's heliport for consideration by the ALUC in a separate public hearing. The Commission approved the second motion by a vote of 5-0. As noted above, upon further review after the public hearing, Staff determined that the heliport required a Minor Aviation Permit, which must be approved by Staff on behalf of the ALUC without a public hearing, instead of a Major Aviation Permit, which must be approved by the ALUC in a public hearing.

On September 25, 2024, the Appellant filed a timely appeal of the Commission's decision.

### **ENVIRONMENTAL DOCUMENTATION**

The Project is exempt from CEQA pursuant to State CEQA Guidelines Sections 15301 (Class 1, Existing Facilities Categorical Exemption), 15303 (Class 3, New Construction or Conversion of Small Structures Categorical Exemption), 15305 (Class 5, Minor Alterations in Land Use Limitations Categorical Exemption), and 15323 (Class 23, Normal Operations of Facilities for Public Gatherings Categorical Exemption) and the County Environmental Document Reporting Procedures and Guidelines.

This Project will authorize the operation of an existing amusement ride (bungee jumping), a private heliport, and overnight camping with appurtenant facilities (a container used as a hangar to store a helicopter, two storage containers, a storage building, an office, a security booth, a restroom building with composting toilets, a removable shade canopy, a directional/informational sign, and fencing). No changes to the existing facilities are proposed except for a new 160-square-foot restroom building with composting toilets to replace the existing outhouse, a new 80-square-foot security booth, new fencing and a new gate, new signage, and new roofs with solar panels on existing structures. The existing outhouse will be converted into a storage structure. The proposed changes to the facilities are minor in scope and would not create any significant new impacts.

No expansion of the number of visitors is proposed, and the number of visitors will remain within the Project baseline that was based on the Applicant's guest logs for the time period of 2013 to 2015. The Project will not have a significant effect on the environment. No development is proposed in an SEA or any other designated, precisely mapped, and officially adopted environmental resource area. The Project does not result in cumulative impacts, is not near a scenic highway, is not included on a list of hazardous waste sites, does not impact historic resources, and does not result in other significant effects on the environment. Therefore, no

exceptions to the Categorical Exemptions mentioned above are applicable and the Project is considered exempt.

**IMPACT ON CURRENT SERVICES (OR PROJECTS)**

Action on the Project is not anticipated to have a negative impact on current services or projects.

For further information, please contact Richard Claghorn of the North County Development Services Section at (213) 893-7015 or [rclaghorn@planning.lacounty.gov](mailto:rclaghorn@planning.lacounty.gov).

Respectfully submitted,



AMY J. BODEK, AICP  
Director of Regional Planning

AJB:DJD:MG:SZD:RWC:lm

Attachments:

1. Appeal
2. Applicant's Response to Appeal
3. Findings and Conditions
4. Commission Hearing Packages
5. Correspondence
6. Site Plans

c: Executive Office, Board of Supervisors  
Assessor  
Chief Executive Office  
County Counsel  
Public Works

NON-APPLICANT

Date September 25, 2024

Public Hearing/Zoning Section  
Los Angeles County Board of Supervisors  
Room 383, Kenneth Hahn  
Hall of Administration  
500 West Temple Street  
Los Angeles, California 90012

PROJECT NO.: 2018-003069-(5)

APPLICANT: Bungee America, Inc.

LOCATION: Assessor's Parcel Numbers 8678-002-015 and 8678-002-016, a private inholding within the Angeles National Forest, also known as the Bridge to Nowhere.

Zoned District: C-R

Related zoning matters:

CUP(s) or VARIANCE No. CUP No. No. RPPL2018004676; Variance No. RPPL2018004861

Change of Zone Case No.

Other

This is an appeal on the decision of the Regional Planning Commission in the subject case. This form is to be presented in person with a check or money order made payable to the "Board of Supervisors" (check or money order must be presented with personal identification), during regular business hours of 8:00 a.m. to 5:00 p.m. prior to the appeal deadline at the above address. (Appeal fees subject to change). Contact the Zoning Section of the Board of Supervisors for information: (213) 974-1426.

This is to appeal: (Check one)

The Denial of this request: \$1,142\*

The Approval of this request: \$1,142\*

\*Except for Subdivision appeals: \$130.00 of this appeal amount is allocated to the Board of Supervisors' Hearing





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**VIA E-MAIL**

September 25, 2024

County of Los Angeles  
Board of Supervisors  
500 W. Temple Street  
Los Angeles, CA 90012  
Em: [appeal@planning.lacounty.gov](mailto:appeal@planning.lacounty.gov)

**RE: Justification for Appeal of Project No 2018-003069-(5), Conditional Use Permit No. RPPL2018004676 and Variance No. RPPL2018004861.**

Dear Board of Supervisors,

On behalf of the Save the East Fork Association, my Office is submitting this appeal of the Regional Planning Commission's decision dated September 11, 2024 to approve the Conditional Use Permit, Variance, and CEQA Exemption for Project No. 2018-003069-(5) (CUP RPPL2018004676 and Variance No. RPPL2018004861) for the Bridge to Nowhere commercial bungee jumping operation ("Project").

Save the East Fork Association was created to work with the various governmental agencies and conservation groups to improve recreation and safety, and advocates for the watershed and protected habitat along the East Fork of the San Gabriel River.

The Project creates numerous environmental and health impacts which must be adequately studied and mitigated.

**I. THE SITE HAS SEVERE FIRE RISKS WHICH ARE NOT MITIGATED**

The Project seeks permits for the operation of an amusement park in a Very High Fire Hazard Severity Zone, which presently impacted by the Bridge Fire.<sup>1</sup> To allow the operation of an amusement park, welcoming a large amount of visitors, in a fire prone wilderness area with limited means of ingress or egress without even so much as an evacuation plan approved by the County of Los Angeles Fire Department exacerbates fire risks from human activities and is unsafe to the general public.

As the operation of this Project creates significant health and safety risks associated with wildfire, the Board should grant this appeal and deny the CUP. At the very least, further conditions need to be imposed on the Project to ensure the associated health and safety risks are mitigated. Save the East Fork requests the Board require the Project to implement a County of Los Angeles Fire

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<sup>1</sup> At the time of this appeal, the Bridge Fire has burned 54,878 acres across Los Angeles and San Bernardino Counties and is only 91% contained. See CalFire Incidents – Bridge Fire; available at <https://www.fire.ca.gov/incidents/2024/9/8/bridge-fire>.

Department-approved evacuation plan. Further, Save the East Fork requests that attendance and operations are further limited on Red Flag Day to further minimize potential impacts on health and safety when wildfire risks are greatest.

## II. THE HELIPORT WOULD OPERATE WITHOUT PROPER PERMITTING

It is unlawful to operate a heliport in the State of California without a State Heliport Permit. The State Aeronautics Act, California Public Utilities Code (“PUC”) section 21001 *et seq* and Title 21 of the California Code of Regulations (“CCR”) sections 3525-3560, outline the requirements for permitting a heliport. Importantly, that unless specified in the law otherwise, the use of the word “airport” is interchangeable with “heliport.” Under PUC section 21663, it is unlawful for “any person to operate an airport unless an appropriate airport permit required by rule of the Department has been issued by the Department and has not subsequently been revoked.”

The materials for the CUP application show that an FAA checklist has been performed for the private use of the helicopter but *fails to show that the applicant has received a permit for the commercial operation of the helicopter*. Under PUC section 21662 and CCR section 3533, a personal use heliport is only exempt from obtaining a state permit when using a heliport for private, non-commercial use in an unincorporated area meeting the safety standards established by Article 5 of CCR section 3560.

As noted in the Staff Report, “The helicopter flights are for logistical support, such as carrying equipment and supplies and removing waste and trash from the Project Site.” (Staff Report, p. 7.) Thus, the use of the helicopter is clearly to support the commercial bungee jumping activity. The proper classification for the heliport would be a special-use site, which requires permitting by the Department of Transportation Aeronautics Division prior to use.

Thus, the appeal must be granted as the CUP cannot permit the unlawful operation of the heliport. Save the East Fork requests that, at a minimum, a condition of approval be added to require the applicant to obtain all necessary permitting from the State prior to the operation of heliport.

## III. THE CEQA EXEMPTIONS ARE IMPROPER

The hearing packet identifies four CEQA exemptions for the Project: (1) Class 1 (Existing Facilities), (2) Class 3 (New Construction or Conversion of Small Structures), (3) Class 5 (Minor Alterations in Land Use Limitations), and (4) Class 23 (Normal Operations of Facilities for Public Gatherings). However, as explained below, none of these exemptions are suitable for the Project.

Although CEQA creates strong presumption in favor of requiring the preparation an EIR, it enumerates certain limited categories of activities exempt from the requirement to prepare an EIR. Those “categorical exemptions” and the criteria a project must meet to fit within them are listed in section 15301 through 15333 of the CEQA Guidelines. Categorical exemptions are narrowly construed to afford the fullest possible environmental protection. See *Save Our Carmel River v. Monterey Peninsula Water Management Dist.* (2006) 141 Cal.App.4th 677, 697). Furthermore, even projects that technically fit the criteria of a categorical exemption might nevertheless be excepted from relying on them for a variety of reasons enumerated at CCR § 15300.2. If a project does not fit

the criteria of a categorical exemption, or if it meets the criteria of a categorical exemption but is excepted from relying on the exemption pursuant to CCR section 15300.2, §the City must evaluate the project through an EIR or other CEQA analysis. As such, an EIR must be prepared prior to the issuance of the CUP or Variance.

*A. The Project is Ineligible for a Class 1 Existing Facilities Exemption.*

The key consideration for a Class 1 Exemption is whether the project involves negligible or no expansion of the scope of existing or former use. CEQA Guidelines, § 15301. And while the size or scope of the existing facility is not determinative of whether the exemption may stand, the scope of the expansion is. *See World Business Academy v. State Lands Com.* (2018) 24 Cal.App.5th 476.

While a Project that repairs or maintains a facility falls within the Existing Facilities Exemption, a decision to expand or improve a facility does not. *Erven v. Board of Supervisors* (1975) 53 Cal.App.3d 1004 (“Should the Board decide in the future to widen existing public roads or to acquire private road easements, by condemnation or dedication, and improve them, such actions would not qualify for exemption and compliance with the CEQA would be required either by the preparation and consideration of an environmental impact report or by a negative declaration.”).

The County has the burden of demonstrating with “substantial evidence” that the Project fits within the Existing Facilities Exemption. *See Save Our Big Trees v. City of Santa Cruz* (2015) 241 Cal.App.4th 694, 705. Moreover, the Existing Facilities Exemption is strictly and narrowly construed. *Co. of Amador v. El Dorado Co. Water Agency* (1999) 76 Cal.App.4th 961, 966 – 67. *Azusa Land Reclamation Co., supra*, 52 Cal.App.4th at 1192 (“a term that does not have a clearly established meaning, such as the exemption for existing ‘facilities,’ should not be so broad interpreted. . . .”).

“The apparent rationale for the existing facilities exemption is that the environmental effects of the operation of such facilities must already have been considered.” *Azusa Land Reclamation Co., supra*, 52 Cal. App. 4th at 1195; *see also Lewis v. Seventeenth District Agricultural Ass’n* (1985) 165 Cal.App.3d 823, 837 (“The purpose of the categorical exemption . . . . is aimed at preventing a duplication in evaluations.”); *Bloom v. McGurk* (1994) 26 Cal.App.4th 1307, 1313 - 14 (citing *Committee for a Progressive Gilroy. State Water Resources Control Bd.* (1987) 192 Cal.App.3d 847, 864) (“a facility does not 'exist' within the meaning of the class 1 exemption unless it predates the enactment of CEQA or was originally implemented in compliance with CEQA.”).

In this case, Bungee America has never had any right to operate the commercial bungee jumping operation or associated heliport and outhouse without a CUP. While the applicant has previously requested a Clean Hands Waiver after receiving a Notice of Violation from the County, no clear environmental review has been performed to properly establish a baseline. Importantly, the baseline years of 2013-2015, as referenced in the Staff Report, seem to be an arbitrary set of dates without clear reasoning other than the existence of logbooks. However, the provided materials for the hearing fail to include the referenced logbooks which are necessary to determine if the number of visitors and trips included in the Conditions for Approval are appropriate for the site or would constitute an expanded scope.

Further, Staff Report identifies numerous changes to the facilities from the 2013-2015 baseline stated in the staff report, including a new 160-square-foot restroom building with composting toilets, a new 80-square-foot security booth, new fencing, a new gate, new signage, new roofs with solar panels, and the conversion of the existing outhouse into a storage structure.” (Staff Report, p. 9). The Staff Report fails to identify what the scope of these changes will be in comparison with the baseline years.

As this facility has yet to go through environmental review, a Class 1 Exemption is improper.

*B. Class 23 Exemption – Normal Operations of Facilities for Public Gatherings*

The LA County CEQA Guidelines, Appendix G include the County’s definition of a Class 23 Exemption as “consist[ing] of the normal operations of existing facilities for public gatherings for which the facilities were designed, where there is a past history of the facility being used for the same kind of purpose.” By this definition, it is clear that this operation is outside of the intended use of this CEQA Exemption. The Bridge to Nowhere was never intended to become a bungee jumping operation, but rather was a portion of a larger road expansion project that was ultimately abandoned due to flooding (Staff Report, p. 5.)

A Class 23 Exemption is further inapplicable as the proposed use far from “public gathering facility” as supported by the examples included in the County’s CEQA Guidelines Appendix G. “Facilities included within this exemption include, but are not limited to, racetracks, stadiums, convention centers, auditoriums, community centers, amphitheaters, planetariums, swimming pools, parks and beaches.” Each of these facilities, notably, are able to accommodate large numbers of people and usually have inclusive accessibility features. The proposed use is far from a “public gathering facility” and inherently would not be considered a normal operation for which the facilities were originally designed. As such, the Class 23 Exemption cannot be applied to this case.

*C. The exceptions outlined in CEQA Guidelines Section 15300.2 apply to the Project.*

The CEQA Guidelines clearly allow for exceptions to the categorical exemptions in six areas, based on (1) location, (2) cumulative impact, (3) significant effect, (4) scenic highways, (5) hazardous waste sites, and (6) historical resources. (CEQA Guidelines Section 15300.2.) As applied to the proposed Project, the location-based exception and significant effect exception are both clearly applicable.

Exceptions based on the first category, location, are limited to Classes 3, 4, 5, 6, and 11. Importantly, this exception exists because “a project that is ordinarily insignificant in its impact on the environment may in a particularly sensitive environment be significant.” (Id.) This Project seeks two CEQA Class Exemptions, 3 and 5, which are subject to the location limitations.

The Project is located within the Sheep Mountain Wilderness (Est. in 1984) and San Gabriel National Monument (Est. in 2014, expanded in 2024). While the bridge itself is privately owned, access to the site requires the use of these sensitive environmental areas. The area surrounding the Project site is rich with sensitive environmental species and habitat. The US Forest Service has stressed the ecological importance of the area noting that the area contains “more than 500 native plants and fungi, and dozens of endangered, threatened, rare or sensitive species including the

California condor, Nelson’s bighorn sheep, California spotted owl, and the Southern California legless lizard.”<sup>2</sup> The area is also home to a portion of the “*rare Mediterranean ecosystem found in just over two percent of the world’s land areas.*”<sup>3</sup> The unique and sensitive location of the Project Site means that Class 3 and 5 Exemptions *cannot* apply to the Project.

Further, all Class Exemptions are inapplicable in areas where there is “a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances.” CEQA Guidelines Section 15300.2. Here, the unusual circumstances are clear as the use of the site for commercial recreation increases the level of human disturbance on the Sheep Mountain Wilderness and San Gabriel National Monument, an impact that is further explored below.

By increasing the number of people who would otherwise use the East Fork Trail and relying on a helicopter to supply the business and remove the generated waste products, the Project inherently increases the stressors on a critical environment. The proposed uses would increase local GHG emissions through helicopter use and reliance on individual motor vehicles, create noise pollution for the nearby wildlife, and impact the biological resources in the area, resulting in clearly significant impacts.

As such, the Board must grant the appeal of the clearly inapplicable CEQA exemptions and require an environmental review of the project before the CUP or Variance applications may be reheard.

#### **IV. THE PROJECT HAS CLEAR ENVIRONMENTAL IMPACTS THAT MUST BE STUDIED AND MITIGATED**

The Project is in an area of great ecological value, surrounded by the Sheep Mountain Wilderness and the San Gabriel National Monument. As such, the impacts of commercial activity on the area must be properly evaluated to ensure all necessary mitigations are in place to maintain the area for future generations.

Here, the fair argument test would be applicable to the Project. This test stems from the statutory mandate that an EIR be prepared for any project that “may have a significant effect on the environment.” PRC, § 21151; *see No Oil, Inc. v. City of Los Angeles* (1974) 13 Cal.App.3d 68, 75; accord *Jensen v. City of Santa Rosa* (2018) 23 Cal.App.5th 877, 884. As such, if a proposed project is not exempt and may cause a significant effect on the environment, the lead agency must prepare an EIR. PRC, §§ 21100 (a), 21151; CEQA Guidelines, § 15064 (a)(1), (f)(1). As established above, the CEQA exemptions utilized to exempt the Project were *improper and are inapplicable to the proposed use.*

In these instances, an EIR may be dispensed with only if the lead agency finds no substantial evidence in the initial study or elsewhere in the record that the project may have a significant effect on the environment. *Parker Shattuck Neighbors v. Berkeley City Council* (2013) 222 Cal.App.4th 768, 785.

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<sup>2</sup> *San Gabriel Mountains National Monument - Biodiversity*, US Forest Service; available at <https://www.fs.usda.gov/visit/national-monuments/san-gabriel-mountains-national-monument#:~:text=The%20San%20Gabriel%20Mountains%20National%20Monument%20contains%20spectacular%20biodiversity%2C%20including,the%20South%20California%20legless%20lizard.>

<sup>3</sup> *Id.* (Emphasis added).

In such a situation, the agency must adopt a negative declaration. PRC, § 21080, subd. (c)(1); CEQA Guidelines, §§ 15063 (b)(2), 15064(f)(3).

Save the East Fork urges the Board to require an EIR for the Project. At the very least, an initial study must be prepared to determine the potential extent of the Project’s significant impacts. “Significant effect upon the environment” is defined as “a substantial or potentially substantial adverse change in the environment.” PRC, § 21068; CEQA Guidelines, § 15382. A project may have a significant effect on the environment if ***there is a reasonable probability that it will result in a significant impact***. *No Oil, Inc.*, 13 Cal.3d at p. 83 fn. 16; see *Sundstrom v. County of Mendocino* (1988) 202 Cal.App.3d 296, 309. If any aspect of the project may result in a significant impact on the environment, an EIR must be prepared even if the overall effect of the project is beneficial. CEQA Guidelines, § 15063(b)(1); see *County Sanitation Dist. No. 2 v. County of Kern* (2005) 127 Cal.App.4th 1544, 1580.

As such, the standard sets a “low threshold” for preparation of an EIR. *Consolidated Irrigation Dist. v. City of Selma* (2012) 204 Cal.App.4th 187, 207; *Nelson v. County of Kern* (2010) 190 Cal.App.4th 252; *Pocket Protectors v. City of Sacramento* (2004) 124 Cal.App.4th 903, 928; *Bowman v. City of Berkeley* (2004) 122 Cal.App.4th 572, 580; *Citizen Action to Serve All Students v. Thornley* (1990) 222 Cal.App.3d 748, 754; *Sundstrom*, 202 Cal.App.3d at p. 310.

If substantial evidence in the record supports a fair argument that the project may have a significant environmental effect, the lead agency must prepare an EIR even if other substantial evidence before it indicates the project will have no significant effect. See *Jensen*, 23 Cal.App.5th at p. 886; *Clews Land & Livestock v. City of San Diego* (2017) 19 Cal.App.5th 161, 183; *Stanislaus Audubon Society, Inc. v. County of Stanislaus* (1995) 33 Cal.App.4th 144, 150; *Brentwood Assn. for No Drilling, Inc. v. City of Los Angeles* (1982) 134 Cal.App.3d 491; *Friends of “B” St.*, 106 Cal.App.3d 988; CEQA Guidelines, § 15064(f)(1).

As outlined below, there is a fair argument that the Project will create significant environmental impacts. Such impacts must be evaluated through the preparation of an EIR.

#### *A. User Limits are Not Supported*

The Project’s Conditions of Approval include user limits based on the applicant’s visitor logs from 2013-2015. These years were determined to be a “baseline” year for visitor numbers, but the reasoning behind that determination is not discussed as this Project has ***never*** been a permitted activity. (Staff Report, p. 9.)

Use of trails is not a neutral activity. Rather, with increased use, comes increased soil erosion, unplanned trail widening, trampling of sensitive species, and increased pollution through improperly disposed of waste.<sup>4</sup> Further, increases in man-made noise can significantly change the behaviors of

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<sup>4</sup> Havlick, D. G., Billmeyer, E., Huber, T., Vogt, B., & Rodman, K. (2016). *Informal trail creation: hiking, trail running, and mountain bicycling in shortgrass prairie*. *Journal of Sustainable Tourism*, 24(7), 1041–1058. <https://doi.org/10.1080/09669582.2015.1101127>; Martin, R., & Butler, D. R. (2017). *A Framework for Understanding Off-trail Trampling Impacts in Mountain Environments*. *The George Wright Forum*, 34(3), 354–367. <https://www.jstor.org/stable/26452978>; and Dynowski, P., Senetra, A., Żróbek-Sokolnik, A., & Kozłowski, J. (2019).

nearby wildlife.<sup>5</sup> By increasing the amount of people continually using the trail, the Project inherently exacerbates the impacts on the local environment.

As such, there is a fair argument that the increased use of the trail will lead to significant biological resource impacts. An EIR must be prepared, including an analysis to establish the proper user limits to mitigate the impacts on the area's biological resources.

*B. The Heliport Creates Noise and Biological Resources Impacts That Are Incompatible with the Site's Zoning.*

As referenced above, the increase in man-made noise has significant impacts on nearby wildlife. The Project's heliport will create a significant level of noise in an otherwise quiet area. The noise produced by the helicopter will also impact nearby sensitive users, such as other trail users or nearby campers.

The intended use of the helicopter, to assist with commercial operations, must be examined to determine the planned frequency of use, the average noise levels produced, and any potential mitigations necessary to reduce the noise.

The Project's site is zoned for commercial recreation, which requires that exterior noise levels shall not exceed 60 dB during the daytime or 55 dB during the nighttime. (LA County Code § 12.08.390.) The Airport Land Use Commission's procedural policies outline that any new heliports must also be reviewed for compatibility with the land uses. (ALUC Procedural Policies, Chapter 2.4.4.2.) In this instance, the operation of a heliport would result in noise levels that exceed associated limits. As such, the heliport is not compatible with the site and further mitigation is necessary.

*C. The Construction Plan and Associated Impacts Must Be Studied*

The CUP includes approval for the construction of new structures, the conversion of an existing structure, and composting toilets. The impacts of this construction, however, has not been evaluated or explained by the Applicant. The remote nature of the Project site raises concerns as to how the necessary materials will be transported to the site and what the impacts of said construction will be on the sensitive ecological area and wildlife.

The materials will either need to be carried in by individuals, further causing trail congestion and degradation, or by helicopter, which will increase air quality, noise, and biological resources impacts. There is also potential for water quality impacts as the construction may result in runoff to the nearby river.

As such, the construction impacts must be evaluated and properly mitigated, including potential monitoring and site surveys prior to and land disturbances.

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*The impact of recreational activities on aquatic vegetation in alpine lakes.* Water (Switzerland), 11(1).  
<https://doi.org/10.3390/w11010173>.

<sup>5</sup> Slabbekoorn, H., Dooling, R. J., Popper, A. N., & Fay, R. R. (Eds.). (2018). *Effects of Anthropogenic Noise on Animals* (Vol. 66). Springer New York. <https://doi.org/10.1007/978-1-4939-8574-6>.

## V. THE PARKING VARIANCE IS UNSUPPORTED BY COUNTY FINDINGS

The County Code requires the Regional Planning Commission to make findings relating to the impacts of the Variance under Section 22.194.050.B. Specifically, the Regional Planning Commission must find that the proposed uses *will not be materially detrimental* to the use and enjoyment of the property or nearby properties. As the Project site exists in a remote area, access to the site is inherently limited and patrons must access the property via a public trail and associated parking lot. A wilderness permit is required to enter the trail due to the traditionally heavy water-related recreational use.<sup>6</sup>

The limited parking available at the trail is insufficient to support both the general public and the patrons of the applicant’s business. This added congestion leads to a detrimental decrease in access for members of the public who are unable to find parking<sup>7</sup> and, thus, cannot access the trail.

### A. *The Variance is an Improper Vehicle to Determine the Required Parking*

While the County Code allows for a Variance to modify the development standards of “[o]ff-street parking spaces, maneuvering areas and driveway width, and paving standards[,]” it does not apply to the *adequate parking requirements of CUP findings*. (LA County Code § 22.194.020.C.) Rather, the decision on essentially a waiver of any parking requirement is to be reviewed and determined by the Director.

The County Code notes that “[w]here parking requirements for any use are not specified, parking shall be provided in an amount that the Director finds adequate to prevent traffic congestion and excessive on-street parking. Whenever practical, such determination shall be based upon the requirements for the most comparable use specified in this Chapter.” (LA County Code § 22.112.070.C. As such, the RPC’s decision to grant the variance waiving all parking requirements was improper.

### B. *Impacts to Public Use and Enjoyment of the Trail*

The requested Parking Variance would be detrimental to the use and enjoyment of the East Fork Trail and surrounding wilderness areas as it would continue to strain the already limited parking options. While the applicant has stated that there is sufficient parking available for all members of the public, no evidence has been presented to suggest the available parking can adequately serve the 177 guests a day allowed by the Conditions of Approval and all members of the public wishing to access the trail and campground.

Indeed, many of the Bungee America’s patrons park their cars for a significant amount of time as they hike the 10-mile round trip trail and spend hours bungee jumping. Bungee America’s own

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<sup>6</sup> Sheep Mountain Wilderness, US Forest Service; available at: <https://www.fs.usda.gov/detail/sbnf/specialplaces/?cid=stelprd3821646>

<sup>7</sup> The AllTrails page for Bridge to Nowhere via East Fork Trail notes that the trailhead is crowded. As a suggestion, the page recommends arriving early as “[t]he parking area fills up fast due to this hike’s popularity.” Bridge to Nowhere via East Fork Trail, AllTrails; available at: <https://www.alltrails.com/ar/trail/us/california/east-fork-trail-bridge-to-nowhere>.

website states that “[a] day of bungee jumping is a full day adventure.” The Findings establish that the nearby Camp only has 33 available parking spaces, along with additional spots located on the road. (Findings, p. 7.) “Based on the average number of guests in a single day of 65 and a ratio of one space per three guests, a minimum of 22 parking spaces would be required.” (*Id.* at p. 8, emphasis added.) Thus, the Findings establish that on an average day, two-thirds of the parking lot is taken up by patrons of the applicant’s business. The excess of parking spots going to patrons of a private, commercial business is a clear detriment to the ability of the general public to access the site.

*C. Mitigations Should Be Implemented Rather Than the Variance.*

Waiving the parking requirements without mitigation measures fails to avoid the increased strain on the limited parking options available to the public. Rather, the Board should consider implementing mitigation measures, such as an applicant-operated shuttle system, to reduce the parking stresses. Bungee America could operate a shuttle to-and-from an off-site parking area to allow their patrons access to the trailhead while limiting the number of personal vehicles parking for large portions of the day. This mitigation would also reduce the Project’s VMTs and increase oversight of the business’s patrons.

While the Applicant has claimed that a shuttle would be “infeasible” due to excessive wait times, the findings fail to establish that *the County itself* has determined a shuttle operation would be infeasible. (Findings, p. 13.) Indeed, the findings themselves fail to establish that the County reviewed or proposed *any* feasible alternatives, but rather accepted the Applicant’s statements as fact. The failure to provide support for the County’s interpretation is a fatal flaw that must be corrected.

Ordinances, like statutes, are interpreted by Courts as questions of law. *See Southern Cal. Edison Co. v. Public Utilities Com.* (2000) 85 Cal.App.4th 1086, 1096; *Anderson v. San Francisco Rent Stabilization & Arbitration Bd.* (1987) 192 Cal. App. 3d 1336, 1343. Importantly, while judicial deference is typically given to an agency’s interpretation, the extent of such deference is fundamentally situational, and the ultimate resolution of the legal question lies with the Courts. *Yamaha Corp. of America v. State Bd. of Equalization* (1998) 19 Cal.4th 1, 12 – 3.

**VI. CONCLUSION**

Save the East Fork urges the Board to grant the appeal of the CUP and Variance applications, require the Project to undergo full environmental review under CEQA, create a fire evacuation plan, and obtain all necessary permits from the Department of Transportation Aeronautics Division prior to any rehearing on the matter.

Save the East Fork welcomes the opportunity to speak with the Board to discuss any questions surrounding these comments.

Sincerely,



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Grace Holbrook  
Attorneys for Save the East Fork

Attached:

Save the East Fork Comment Letter submitted for the September 11, 2024 Regional Planning Commission Hearing; and

Hearing Packet Project No. 2018-003069-(5), including the Staff Report and Findings.

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**VIA E-MAIL**

September 10, 2024

Regional Planning Commission  
County of Los Angeles  
320 W. Temple St., Room 150  
Los Angeles, CA 90012  
Em: [comment@planning.lacounty.gov](mailto:comment@planning.lacounty.gov)

**RE: County of Los Angeles Regional Planning Commission,  
Conditional Use Permit No. RPPL2018004676 and Variance No.  
RPPL2018004861 (Agenda Item No. 9).**

Dear Chairperson Pam O'Connor, Vice Chair David W. Louie, Commission Secretary Elida Luna, and Honorable Commissioners,

On behalf of the Save the East Fork Association, my Office is submitting these comments for the County's ("**County**") Agenda Item No. 9, a discussion on Conditional Use Permit No. RPPL2018004676 and Variance No. RPPL2018004861 for the Bridge to Nowhere commercial bungee jumping operation ("**Project**").

Save The East Fork Association was created to work with the various governmental agencies and conservation groups to improve recreation and safety, and advocating for the watershed and protected habitat along the East Fork of the San Gabriel River.

The County Regional Planning Commission should vote to deny the Project. The Project would permit the operation of an amusement park in a Very High Fire Hazard Severity Zone that is at present closed due to the Bridge Fire. To allow the operation of an amusement park, welcoming a large amount of visitors, in a fire prone wilderness area with limited means of ingress or egress without even so much as an evacuation plan approved by the County of Los Angeles Fire Department exacerbates fire risks from human activities and is unsafe to the general public.

In addition, the County is proposing to approve the Project without a required State Heliport license in violation of State law. Finally, the County is unlawfully proposing to exempt the Project from CEQA environmental review.

## I. BACKGROUND

Project No. 2018-003069-(5) is a private inholding within the Angeles National Forest also known as the Bridge to Nowhere Antelope Valley Planning Area. The applicant seeks a Conditional Use Permit (No. RPPL2018004676 ) to authorize an amusement ride (bungee jumping), a private heliport, and overnight camping with appurtenant facilities (a container used as a hangar to store a helicopter, two storage containers, a storage building, an office, a security booth, restroom building with composting toilets, a removable shade canopy, a directional/informational sign, and fencing), as well a Parking Variance (No. RPPL2018004861) to waive all required parking.

Per the Staff Report, the applicant has been in operation since 1989. (Staff Report, p. 5.) They operated without any permitting for the first four years. (*Id.*) In 1993, the applicant sought permits with the State of California Department of Industrial Relations' Division of Occupational Safety and Health. (*Id.*)

However, the Bungee America did not obtain the necessary CUP for the operation as required by Los Angeles County Code Section 22.20.030 (Land Use Regulations for Commercial Zones). The applicant was first notified of their failure to obtain the necessary permits on May 8, 2014, when Staff issued a Notice of Violation for maintaining amusement rides (bungee jumping and a zipline) and appurtenant facilities (cargo containers).

## II. THE PROJECT WOULD BE APPROVED IN VIOLATION OF THE CALIFORNIA ENVIRONMENTAL QUALITY ACT

### A. Background Concerning the California Environmental Quality Act

The California Environmental Quality Act is a California statute designed to inform decision-makers and the public about the potential significant environmental effects of a project. 14 California Code of Regulations (“**CEQA Guidelines**”), § 15002, subd. (a)(1).<sup>1</sup> At its core, its purpose is to “inform the public and its responsible officials of

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<sup>1</sup> The CEQA Guidelines, codified in Title 14 of the California Code of Regulations, section 15000 et seq., are regulatory guidelines promulgated by the state Natural Resources Agency for the implementation of CEQA. Cal. Pub. Res. Code, § 21083. The CEQA Guidelines are given “great weight in interpreting CEQA except when . . . clearly unauthorized or erroneous.” *Center for Biological Diversity v. Dept. of Fish & Wildlife* (2015) 62 Cal.4th 204, 217.

the environmental consequences of their decisions *before* they are made.” *Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal.3d 553, 564.

1. *Background Concerning Environmental Impact Reports*

CEQA directs public agencies to avoid or reduce environmental damage, when possible, by requiring alternatives or mitigation measures. CEQA Guidelines, § 15002, subds. (a)(2)-(3); see also *Berkeley Keep Jets Over the Bay Committee v. Board of Port Comes* (2001) 91 Cal.App.4th 1344, 1354; *Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal.3d 553; *Laurel Heights Improvement Assn.*, 47 Cal.3d at p. 400. The EIR serves to provide public agencies and the public in general with information about the effect that a proposed project is likely to have on the environment and to “identify ways that environmental damage can be avoided or significantly reduced.” CEQA Guidelines, § 15002, subd. (a)(2). If the project has a significant effect on the environment, the agency may approve the project only upon finding that it has “eliminated or substantially lessened all significant effects on the environment where feasible” and that any unavoidable significant effects on the environment are “acceptable due to overriding concerns” specified in Public Resources Code section 21081. See CEQA Guidelines, § 15092, subds. (b)(2)(A)-(B).

While the courts review an EIR using an ‘abuse of discretion’ standard, the reviewing court is not to *uncritically* rely on every study or analysis presented by a project proponent in support of its position. *Berkeley Jets*, 91 Cal.App.4th at p. 1355 (quoting *Laurel Heights Improvement Assn.*, 47 Cal.3d at pp. 391, 409 fn. 12) (internal quotations omitted). A clearly inadequate or unsupported study is entitled to no judicial deference. *Id.* Drawing this line and determining whether the EIR complies with CEQA’s information disclosure requirements presents a question of law subject to independent review by the courts. *Sierra Club v. County of Fresno* (2018) 6 Cal.5th 502, 515; *Madera Oversight Coalition, Inc. v. County of Madera* (2011) 199 Cal.App.4th 48, 102, 131. As the court stated in *Berkeley Jets*, prejudicial abuse of discretion occurs if the failure to include relevant information precludes informed decision-making and informed public participation, thereby thwarting the statutory goals of the EIR process. 91 Cal.App.4th at p. 1355 (internal quotations omitted).

The preparation and circulation of an EIR is more than a set of technical hurdles for agencies and developers to overcome. *Communities for a Better Environment v. Richmond* (2010) 184 Cal.App.4th 70, 80 (quoting *Vineyard Area Citizens for Responsible Growth, Inc. v. City of Rancho Cordova* (2007) 40 Cal.4th 412, 449-450). The EIR’s function is to

ensure that government officials who decide to build or approve a project do so with a full understanding of the environmental consequences and, equally important, that the public is assured those consequences have been considered. *Id.* For the EIR to serve these goals it must present information so that the foreseeable impacts of pursuing the project can be understood and weighed, and the public must be given an adequate opportunity to comment on that presentation before the decision to go forward is made. *Id.*

A strong presumption in favor of requiring preparation of an EIR is built into CEQA. This presumption is reflected in what is known as the “fair argument” standard under which an EIR must be prepared whenever substantial evidence in the record supports a fair argument that a project may have a significant effect on the environment. *Quail Botanical Gardens Found., Inc. v. City of Encinitas* (1994) 29 Cal.App.4th 1597, 1602; *Friends of “B” St. v. City of Hayward* (1980) 106 Cal.3d 988, 1002.

The fair argument test stems from the statutory mandate that an EIR be prepared for any project that “may have a significant effect on the environment.” PRC, § 21151; see *No Oil, Inc. v. City of Los Angeles* (1974) 13 Cal.App.3d 68, 75; accord *Jensen v. City of Santa Rosa* (2018) 23 Cal.App.5th 877, 884. Under this test, if a proposed project is not exempt and may cause a significant effect on the environment, the lead agency must prepare an EIR. PRC, §§ 21100 (a), 21151; CEQA Guidelines, § 15064 (a)(1), (f)(1). An EIR may be dispensed with only if the lead agency finds no substantial evidence in the initial study or elsewhere in the record that the project may have a significant effect on the environment. *Parker Shattuck Neighbors v. Berkeley City Council* (2013) 222 Cal.App.4th 768, 785. In such a situation, the agency must adopt a negative declaration. PRC, § 21080, subd. (c)(1); CEQA Guidelines, §§ 15063 (b)(2), 15064(f)(3).

“Significant effect upon the environment” is defined as “a substantial or potentially substantial adverse change in the environment.” PRC, § 21068; CEQA Guidelines, § 15382. A project may have a significant effect on the environment if there is a reasonable probability that it will result in a significant impact. *No Oil, Inc.*, 13 Cal.3d at p. 83 fn. 16; see *Sundstrom v. County of Mendocino* (1988) 202 Cal.App.3d 296, 309. If any aspect of the project may result in a significant impact on the environment, an EIR must be prepared even if the overall effect of the project is beneficial. CEQA Guidelines, § 15063(b)(1); see *County Sanitation Dist. No. 2 v. County of Kern* (2005) 127 Cal.App.4th 1544, 1580.

This standard sets a “low threshold” for preparation of an EIR. *Consolidated Irrigation Dist. v. City of Selma* (2012) 204 Cal.App.4th 187, 207; *Nelson v. County of Kern* (2010) 190 Cal.App.4th 252; *Pocket Protectors v. City of Sacramento* (2004) 124 Cal.App.4th 903, 928; *Bowman v. City of Berkeley* (2004) 122 Cal.App.4th 572, 580; *Citizen Action to Serve All Students v. Thornley* (1990) 222 Cal.App.3d 748, 754; *Sundstrom*, 202 Cal.App.3d at p. 310. If substantial evidence in the record supports a fair argument that the project may have a significant environmental effect, the lead agency must prepare an EIR even if other substantial evidence before it indicates the project will have no significant effect. See *Jensen*, 23 Cal.App.5th at p. 886; *Clews Land & Livestock v. City of San Diego* (2017) 19 Cal.App.5th 161, 183; *Stanislaus Audubon Society, Inc. v. County of Stanislaus* (1995) 33 Cal.App.4th 144, 150; *Brentwood Assn. for No Drilling, Inc. v. City of Los Angeles* (1982) 134 Cal.App.3d 491; *Friends of “B” St.*, 106 Cal.App.3d 988; CEQA Guidelines, § 15064(f)(1).

2. *The Proposed CEQA Exemptions Are Not Applicable to the Project.*

The hearing packet identifies four CEQA exemptions for the Project: (1) Class 1 (Existing Facilities), (2) Class 3 (New Construction or Conversion of Small Structures), (3) Class 5 (Minor Alterations in Land Use Limitations), and (4) Class 23 (Normal Operations of Facilities for Public Gatherings). However, as explained below, none of these exemptions are suitable for the Project.

Although CEQA creates strong presumption in favor of requiring the preparation an EIR, it enumerates certain limited categories of activities exempt from the requirement to prepare an EIR. Those “categorical exemptions” and the criteria a project must meet to fit within them are listed in section 15301 through 15333 of the CEQA Guidelines. Categorical exemptions are narrowly construed to afford the fullest possible environmental protection. See *Save Our Carmel River v. Monterey Peninsula Water Management Dist.* (2006) 141 Cal.App.4th 677, 697). Furthermore, even projects that technically fit the criteria of a categorical exemption might nevertheless be excepted from relying on them for a variety of reasons enumerated at CCR § 15300.2. If a project does not fit the criteria of a categorical exemption, or if it meets the criteria of a categorical exemption but is excepted from relying on the exemption pursuant to CCR § 15300.2, the City must evaluate the project through an EIR or other CEQA analysis. As such, an EIR must be prepared prior to the issuance of the CUP or Variance.

3. *The Project is Ineligible for a Class 1 Existing Facilities Exemption.*

The key consideration for a Class 1 Exemption is whether the project involves negligible or no expansion of the scope of existing or former use. (CEQA Guidelines, § 15301.) And while the size or scope of the existing facility is not determinative of whether the exemption may stand, the *scope of the expansion is*. (See *World Business Academy v. State Lands Com.* (2018) 24 Cal.App.5th 476.)

While a Project that repairs or maintains a facility falls within the Existing Facilities Exemption, a decision to expand or improve a facility does not. *Erven v. Board of Supervisors* (1975) 53 Cal. App. 3d 1004 ("Should the Board decide in the future to widen existing public roads or to acquire private road easements, by condemnation or dedication, and improve them, such actions would not qualify for exemption and compliance with the CEQA would be required either by the preparation and consideration of an environmental impact report or by a negative declaration.").

The County has the burden of demonstrating with “substantial evidence” that the Project fits within the Existing Facilities Exemption. See *Save Our Big Trees v. City of Santa Cruz* (2015) 241 Cal. App. 4th 694, 705. Moreover, the Existing Facilities Exemption is strictly and narrowly construed. *Co. of Amador v. El Dorado Co. Water Agency* (1999) 76 Cal. App. 4th 961, 966 – 967. *Azusa Land Reclamation Co., supra*, 52 Cal. App. 4th at 1192 (“a term that does not have a clearly established meaning, such as the exemption for existing ‘facilities,’ should not be so broad interpreted. . . .”).

“The apparent rationale for the existing facilities exemption is that the environmental effects of the operation of such facilities must already have been considered.” *Azusa Land Reclamation Co., supra*, 52 Cal. App. 4th at 1195; see also *Lewis v. Seventeenth District Agricultural Ass’n* (1985) 165 Cal.App.3d 823, 837 (“The purpose of the categorical exemption . . . . is aimed at preventing a duplication in evaluations.”); *Bloom v. McGurk* (1994) 26 Cal. App. 4th 1307, 1313 - 1314 (citing *Committee for a Progressive Gilroy. State Water Resources Control Bd.* (1987) 192 Cal. App. 3d 847, 864) (“a facility does not 'exist' within the meaning of the class 1 exemption unless it predates the enactment of CEQA or was originally implemented in compliance with CEQA.”).

In this case, Bungee America has never had any right to operate the commercial bungee jumping operation or associated heliport and outhouse without a CUP. While the applicant has previously requested a Clean Hands Waiver after receiving a Notice of Violation from the County, no clear environmental review has been performed to

properly establish a baseline. Importantly, the baseline years of 2013-2015, as referenced in the Staff Report, seem to be an arbitrary set of dates without clear reasoning other than the existence of logbooks. However, the provided materials for the hearing fail to include the referenced logbooks which are necessary to determine if the number of visitors and trips included in the Conditions for Approval are appropriate for the site or would constitute an expanded scope.

Further, Staff Report identifies numerous changes to the facilities from the 2013-2015 baseline stated in the staff report, including a new 160-square-foot restroom building with composting toilets, a new 80-square-foot security booth, new fencing, a new gate, new signage, new roofs with solar panels, and the conversion of the existing outhouse into a storage structure.” (Staff Report, p. 9). The Staff Report fails to identify what the scope of these changes will be in comparison with the baseline years.

As this facility has yet to go through environmental review, a Class 1 Exemption is improper.

4. *Class 23 Exemption – Normal Operations of Facilities for Public Gatherings*

The LA County CEQA Guidelines, Appendix G include the County’s definition of a Class 23 Exemption as “consist[ing] of the normal operations of existing facilities **for public gatherings for which the facilities were designed**, where there is a past history of the facility being used for the same kind of purpose.” By this definition, it is clear that this operation is outside of the intended use of this CEQA Exemption. The Bridge to Nowhere was **never intended** to become a bungee jumping operation, but rather was a portion of a larger road expansion project that was ultimately abandoned due to flooding (Staff Report, p. 5.)

A Class 23 Exemption is further inapplicable as the proposed use far from “public gathering facility” as supported by the examples included in the County’s CEQA Guidelines Appendix G. “Facilities included within this exemption include, but are not limited to, racetracks, stadiums, convention centers, auditoriums, community centers, amphitheaters, planetariums, swimming pools, parks and beaches.” Each of these facilities, notably, are able to accommodate large numbers of people and usually have inclusive accessibility features. The proposed use is far from a “public gathering facility” and inherently would not be considered a normal operation for which the facilities were originally designed. As such, the Class 23 Exemption cannot be applied to this case.

5. *The exceptions outlined in CEQA Guidelines Section 15300.2 apply to the Project.*

The CEQA Guidelines clearly allow for exceptions to the categorical exemptions in six areas, based on (1) location, (2) cumulative impact, (3) significant effect, (4) scenic highways, (5) hazardous waste sites, and (6) historical resources. (CEQA Guidelines Section 15300.2.) As applied to the proposed Project, the location-based exception and significant effect exception are both clearly applicable.

Exceptions based on the first category, location, are limited to Classes 3, 4, 5, 6, and 11. Importantly, this exception exists because “a project that is ordinarily insignificant in its impact on the environment may *in a particularly sensitive environment* be significant.” (*Id.*) This Project seeks two CEQA Class Exemptions, 3 and 5, which are subject to the location limitations.

The Project is located within the Sheep Mountain Wilderness (Est. in 1984) and San Gabriel National Monument (Est. in 2014, expanded in 2024). While the bridge itself is privately owned, access to the site requires the use of these sensitive environmental areas.<sup>2</sup> The area surrounding the Project site is rich with sensitive environmental species and habitat.<sup>3</sup> The unique nature of the Project Site means that Class 3 and 5 Exemptions cannot apply to the Project.

Further, all Class Exemptions are inapplicable in areas where there is “a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances.” (CEQA Guidelines Section 15300.2.) Here, the unusual circumstances are clear as the use of the site for commercial recreation increases the level of human disturbance on the Sheep Mountain Wilderness and San Gabriel National Monument.

By increasing the number of people who would otherwise use the East Fork Trail and relying on a helicopter to supply the business and remove the generated waste products, the Project inherently increases the stressors on a critical environment. The

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<sup>2</sup> The East Fork Trail requires a wilderness permit for access. *See* United States Department of Agriculture – Forest Service; available at: <https://www.fs.usda.gov/detail/angeles/specialplaces/?cid=stelprdb519461>

<sup>3</sup> *See* President Biden’s Proclamation on Expanding the San Gabriel National Monument (outlining the various sensitive species within the national monument); available at: <https://www.whitehouse.gov/briefing-room/presidential-actions/2024/05/02/a-proclamation-on-expanding-the-san-gabriel-mountains-national-monument-2024/>

proposed uses would increase local GHG emissions through the helicopter use, create noise pollution for the nearby wildlife, and impact the biological resources in the area, resulting in clear significant impacts. The Commission must perform an environmental review of the project before granting the CUP or Variance applications.

### III. **THE CUP CANNOT BE GRANTED WITHOUT A STATE HELIPORT PERMIT**

It is unlawful to operate a heliport in the State of California without a State Heliport Permit. The State Aeronautics Act (California Public Utilities Code (PUC), Section 21001 et seq.) and the California Code of Regulations (CCR), Title 21, Sections 3525-3560, outline the requirements for permitting a heliport. Importantly, that unless specified in the law otherwise, the use of the word “airport” is interchangeable with “heliport.” Under the PUC Section 21663, it is unlawful for “any person to operate an airport unless an appropriate airport permit required by rule of the Department has been issued by the Department and has not subsequently been revoked.”

The materials for the CUP application show that a FAA checklist has been performed for the private use of the helicopter but fails to show that the applicant has received a permit for the *commercial* operation of the helicopter. Under PUC Section 21662 and CCR Section 3533, a personal use heliport is only exempt from obtaining a state permit when using a heliport for private, *non-commercial* use in an unincorporated area meeting the safety standards established by Article 5 of CCR Section 3560.

As noted in the Staff Report, “The helicopter flights are for logistical support, such as carrying equipment and supplies and removing waste and trash from the Project Site.” (Staff Report, p. 7.) Thus, the use of the helicopter is clearly to support the commercial bungee jumping activity. The proper classification for the heliport would be a special-use site<sup>4</sup>, which requires permitting by the Department of Transportation Aeronautics Division prior to use.

The CUP must not be granted until the applicant has obtained all necessary permitting for the operation of the heliport.

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<sup>4</sup> Department of Transportation, Aeronautics Division, *Heliport Permits*; “A heliport not open to the general public, access to which is controlled by the owner in support of commercial activities, public service operations and/or personal use.” available at: <https://dot.ca.gov/programs/aeronautics/heliport-permits>

#### IV. **THE PARKING VARIANCE WOULD BE DETRIMENTAL TO THE USE AND ENJOYMENT OF THE SHEEP MOUNTAIN WILDERNESS AND SAN GABRIEL NATIONAL MONUMENT.**

The requested Parking Variance would be detrimental to the use and enjoyment of the East Fork Trail and surrounding wilderness areas as it would continue to strain the already limited parking options. While the applicant has stated that there is sufficient parking available for all members of the public, no evidence has been presented to suggest the available parking can adequately serve *the 177 guests* a day allowed by the Conditions of Approval and all members of the public wishing to access the trail and campground.

Indeed, many of the Bungee America’s patrons park their cars for a significant amount of time as they hike the 10-mile round trip trail and spend hours bungee jumping. Bungee America’s own website states that “[a] day of bungee jumping is a full day adventure.”<sup>5</sup> The Findings establish that the nearby Camp only has 33 available parking spaces, along with additional spots located on the road. (Findings, p. 7.) “Based on the *average number of guests in a single day of 65* and a ratio of one space per three guests, *a minimum of 22 parking spaces would be required.*” (*Id.* at p. 8, emphasis added.) Thus, the Findings establish that on an average day, *two-thirds* of the parking lot is taken up by patrons of the applicant’s business. The excess of parking spots going to patrons of a private, commercial business is a clear detriment to the ability of the general public to access the site. As such, the variance must not be granted without adequate mitigations to reduce the impacts, such as the operation of a shuttle by Bungee America to bring the patrons to and from offsite parking to the trailhead.

#### V. **CONCLUSION**

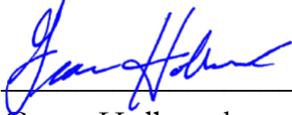
Save the East Fork urges the Commission to deny the CUP and Variance applications, require the Project to undergo full environmental review under CEQA, and obtain all necessary permits from the Department of Transportation Aeronautics Division prior to any rehearing on the matter.

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<sup>5</sup> See Bungee America, *FAQs – How Long Does It Take?*; available at: <https://www.bungeeamerica.com/day-details/faqs>

Save the East Fork welcomes the opportunity to speak with the Commission to discuss any questions surrounding these comments.

Sincerely,



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Grace Holbrook

Attorneys for Save the East Fork

Cc:

## REPORT TO THE REGIONAL PLANNING COMMISSION

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DATE ISSUED: August 29, 2024

HEARING DATE: September 11, 2024      AGENDA ITEM:

PROJECT NUMBER: 2018-003069-(5)

PERMIT NUMBER(S): Conditional Use Permit (“CUP”) RPPL2018004676  
Variance RPPL2018004861

SUPERVISORIAL DISTRICT: 5

PROJECT LOCATION: Assessor’s Parcel Numbers (“APNs”) 8678-002-015  
and 8678-002-016

OWNER: Saunders Mine LLC

APPLICANT: Bungee America, Inc.

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### **RECOMMENDATION**

*The following recommendation is made prior to the public hearing and is subject to change based upon testimony and/or documentary evidence presented at the public hearing:*

LA County Planning staff (“Staff”) recommends **APPROVAL** of Project Number 2018-003069-(5), CUP Number RPPL2018004676 and Variance Number RPPL2018004861, based on the Findings (Exhibit C – Findings) contained within this report and subject to the Draft Conditions of Approval (Exhibit D – Conditions of Approval).

Staff recommends the following motions:

### **CEQA:**

**I MOVE THAT THE REGIONAL PLANNING COMMISSION CLOSE THE PUBLIC HEARING AND FIND THAT THE PROJECT IS CATEGORICALLY EXEMPT PURSUANT TO STATE AND LOCAL CEQA GUIDELINES.**

### **ENTITLEMENTS:**

**I MOVE THAT THE REGIONAL PLANNING COMMISSION APPROVE CONDITIONAL USE PERMIT NUMBER RPPL2018004676 AND VARIANCE NUMBER RPPL2018004861 SUBJECT TO THE ATTACHED FINDINGS AND CONDITIONS.**

### **PROJECT DESCRIPTION**

#### **A. Entitlement(s) Requested**

- A CUP to authorize an amusement ride (bungee jumping), a private heliport, and overnight camping with appurtenant facilities (a container used as a hangar to store a

helicopter, two storage containers, a storage building, an office, a security booth, a restroom building with composting toilets, a removable shade canopy, a directional/informational sign, and fencing) (“Project”) in the C-R (Commercial Recreation) Zone pursuant to County Code Section 22.20.030 (Land Use Regulations for Commercial Zones).

- A Variance to waive the parking requirements for the Project pursuant to County Code Section 22.194.020 (Variances – Applicability).

**B. Project**

The applicant, Bungee America, Inc. (“applicant”), is requesting a CUP to authorize the Project, which is located on a private inholding within the Angeles National Forest along the East Fork Trail, also known as the Bridge to Nowhere (“Project Site”), and a Variance to waive the parking requirements for the Project.

The 50-acre Project Site consists of APNs 8678-002-015 and 8678-002-016. The Project Site is accessible from the East Fork Trail, a horse riding and hiking trail that starts at the end of Camp Bonita Prairie Forks Road, also known as Camp Bonita Road, which is the nearest public road to the Project Site. The Camp Bonita Road public right-of-way is 60 feet wide. The trailhead of the East Fork Trail is located at a parking lot on land owned by the United States Forest Service (“USFS”) at the end of Camp Bonita Road. The distance from the trailhead of the East Fork Trail to the Project Site is approximately five miles. The only other means of access to the Project Site is by helicopter, and the Project includes a private heliport and a container used as a hangar to provide a secondary means of access.

**SUBJECT PROPERTY AND SURROUNDINGS**

The following chart provides property data within a 500-foot radius:

<b>LOCATION</b>	<b>ANTELOPE VALLEY AREA PLAN LAND USE POLICY</b>	<b>ZONING</b>	<b>EXISTING USES</b>
SUBJECT PROPERTY	CR (Rural Commercial)	C-R	Amusement ride (bungee jumping) and private heliport
NORTH	OS-NF (Open Space – National Forest)	W (Watershed)	National Forest
EAST	OS-NF	W	National Forest
SOUTH	OS-NF	W	National Forest
WEST	OS-NF	W	National Forest

**PROPERTY HISTORY**

**A. Zoning History**

<b>ORDINANCE NO.</b>	<b>ZONING</b>	<b>DATE OF ADOPTION</b>
7395	A-1-5 (Light Agricultural, Five Acre Minimum Required Lot Area)	September 23, 1958
20150021Z	C-R	June 16, 2015

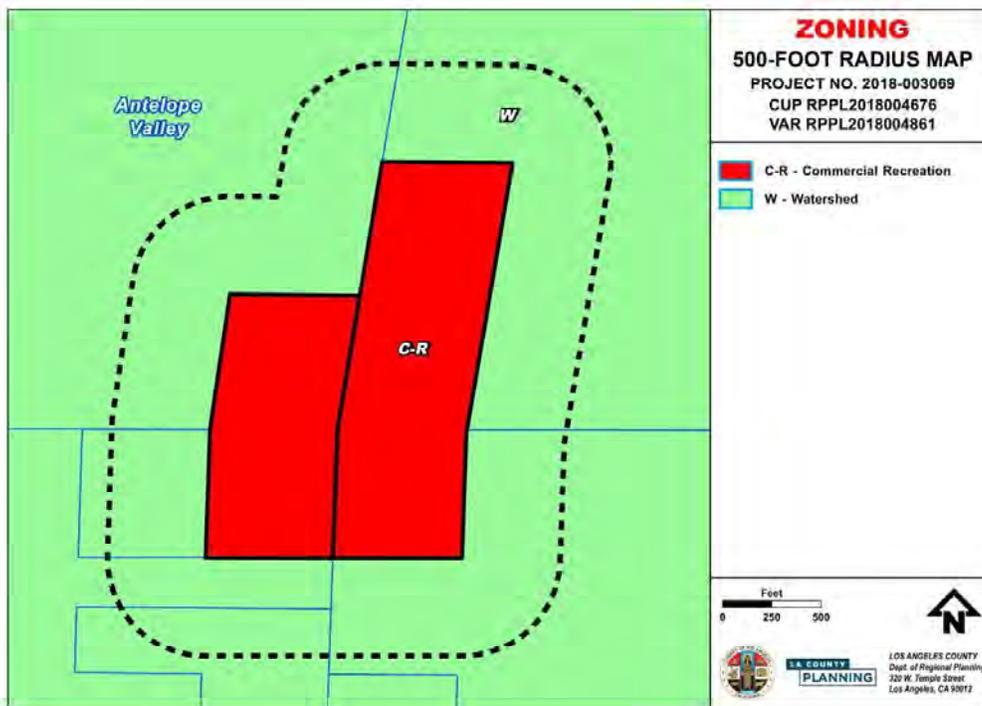
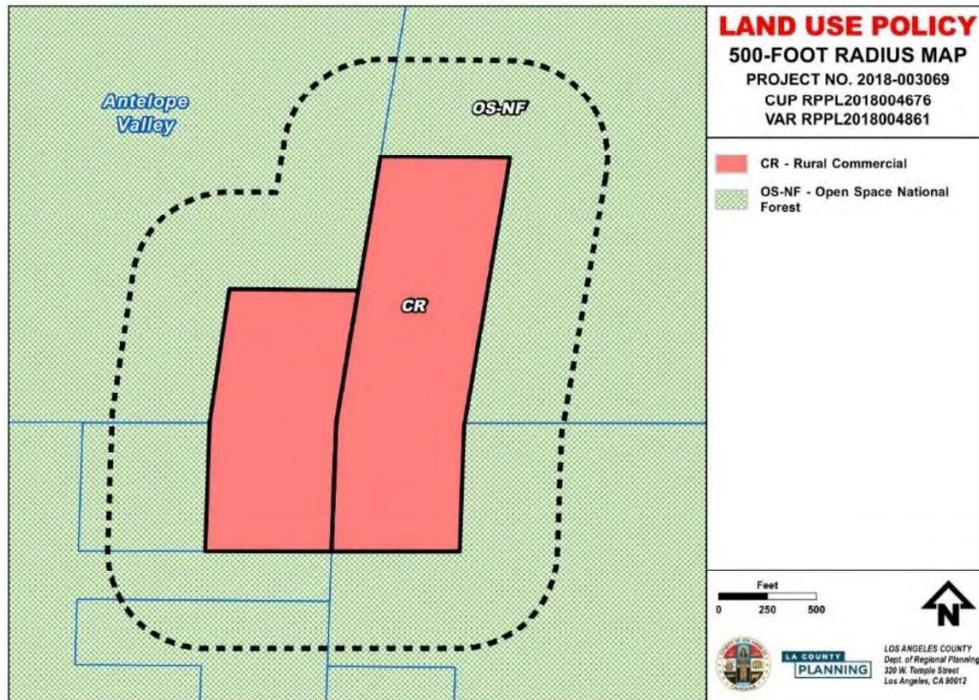
**B. Previous Cases**

<b>CASE NO.</b>	<b>REQUEST</b>	<b>DATE OF ACTION</b>
Certificate of Compliance No. RPPL2018004675	Certify legality of the Project Site parcels and hold them together as one parcel	Recorded September 9, 2019

**C. Violations**

<b>CASE NO.</b>	<b>VIOLATION</b>	<b>CLOSED/OPEN</b>
14-0002827	Amusement rides (zipline and bungee jumping) and appurtenant facilities (cargo containers) maintained on the Project Site without approval	Opened April 30, 2014

**MAPS**



## **ANALYSIS**

### **A. Land Use Compatibility**

The Project Site is located within the CR land use designation of the Antelope Valley Area Plan (“Area Plan”), a component of the General Plan. The CR land use designation identifies lands in the planning area that are designated for limited, low-intensity commercial uses that are compatible with rural and agricultural activities. Specific allowable uses are determined by the underlying zoning designation. The C-R Zone allows amusement rides and private heliports with a CUP and allows campgrounds with a Ministerial Site Plan Review.

The Bridge to Nowhere was built in 1936. In 1938, a flood occurred which washed out the road leading to the bridge, leaving the bridge cut off from any roads and isolated in a remote area. While the road leading to the bridge was abandoned, the Bridge to Nowhere has remained in place and is now under private ownership. The applicant has operated a bungee jumping business at the Bridge to Nowhere since 1989.

Since 1993, the applicant has had permits to operate an amusement ride (bungee jumping) at the Project Site issued by the State of California Department of Industrial Relations’ Division of Occupational Safety and Health (“DOSH”). The permits from DOSH are renewed annually. However, the applicant did not obtain County approval for this land use. A CUP is required for an amusement ride pursuant to County Code Section 22.20.030 (Land Use Regulations for Commercial Zones).

On May 8, 2014, Staff issued a Notice of Violation for maintaining amusement rides (bungee jumping and a zipline) and appurtenant facilities (cargo containers) on the Project Site because these land uses were not permitted in the A-1-5 Zone. On October 28, 2014, the applicant requested a Clean Hands Waiver (“CHW”) pursuant to County Code Section 22.02.070 (Application Where Violation Exists) to allow one of the land uses (bungee jumping) to continue operating while Staff processed an application to approve the land use.

On June 16, 2015, the Project Site’s zoning was changed from A-1-5 to C-R as part of a series of zone changes related to the adoption of the Area Plan. The C-R zone allows the amusement ride (bungee jumping) with a CUP. The land use remained in violation because it was not operating with a CUP.

On July 3, 2018, the Director of Regional Planning (“Director”) approved the CHW request, which allowed the applicant to continue operating the land use for a period of one year while Staff processed a CUP application. On September 13, 2018, the applicant submitted applications for a CUP to authorize the land use and a Parking Permit to modify the parking requirements for the land use. On September 24, 2018, the applicant withdrew the Parking Permit application and submitted a Variance application to waive the parking requirements for the land use. The CHW has been extended multiple times and the current CHW extension expires on February 1, 2025. A copy of the most recent CHW

extension letter, dated February 7, 2024, is attached (Exhibit M – CHW 2024 Time Extension).

Bungee America is a well-established business that has operated at the Bridge to Nowhere since 1989, a period of approximately 35 years. Although the Project Site does not have any parking spaces due to its location five miles from the nearest public road, Bungee America guests have parked at the parking lot at the trailhead of the East Fork Trail and along Camp Bonita Road since the business has been in operation. United States Code Title 16, Section 3170 (b), guarantees a right of access to private inholdings within public lands, including for economic and other purposes, as follows:

**Right Of Access to State or Private Owner or Occupier**

Notwithstanding any other provisions of this Act or other law, in any case in which State owned or privately owned land, including subsurface rights of such owners underlying public lands, or a valid mining claim or other valid occupancy is within or is effectively surrounded by one or more conservation system units, national recreation areas, national conservation areas, or those public lands designated as wilderness study, the State or private owner or occupier shall be given by the Secretary such rights as may be necessary to assure adequate and feasible access for economic and other purposes to the concerned land by such State or private owner or occupier and their successors in interest. Such rights shall be subject to reasonable regulations issued by the Secretary to protect the natural and other values of such lands.

Therefore, federal law allows the applicant and Bungee America employees and guests to use the existing parking facilities on USFS land to access the Project Site. From 1995 to 2014, the USFS provided the applicant with USFS Administrative Parking Passes for him and his employees to park at the trailhead. However, the applicant has stated that these parking passes are no longer needed because he and his employees now use the same USFS Adventure Passes used by others who enter the Angeles National Forest, including guests who use the bungee jumping facilities. The applicant is an authorized vendor of USFS Adventure Passes, which are required to park in the existing designated parking areas.

The applicant submitted a Variance application to waive the parking requirements for the Project because of the unique circumstances of the Project Site, which is five miles from the nearest public road, and the lack of alternative parking facilities in the vicinity. The draft conditions of approval set limits on the number of guests for the Project on a daily, monthly, and annual basis, as well as limits on the number of overnight camping trips and the number of overnight guests on an annual and nightly basis. These limits are based on the applicant's guest logs for the time period of 2013 to 2015, which also established the baseline for the Project's environmental analysis, as explained below. These limits will ensure that the Project will continue its current operations without increasing the existing impacts to the environment and continue to be compatible with the area.

The Project includes a private heliport. The heliport is comprised of a helicopter landing area and a container used as a hangar. The helicopter is usually kept off site and is infrequently flown to the Project Site. The helicopter flights are for logistical support, such as carrying equipment and supplies and removing waste and trash from the Project Site. The helicopter is not used for carrying guests to or from the Project Site. The applicant requests the continued use of the existing private heliport on the Project Site, which has not been previously authorized by the County.

Currently there is an outhouse on the Project Site to serve employees and customers. It will be replaced by a new restroom building on the Project Site with composting toilets. The composting toilets would allow for the composting of human solid waste on the Project Site while human liquid waste would be transported off the site by a helicopter. This change will reduce the amount of waste and will dispose the waste in a more efficient and environmentally sensitive way. The draft conditions of approval require periodic evaluations of the composting toilet system by a certified industrial hygienist throughout the grant term to ensure that it is functioning correctly to the satisfaction of the Director. If it is not functioning correctly, the draft conditions of approval require that the operation of the Project must cease until necessary repairs or modifications are made, inspected, and approved by a certified industrial hygienist to the satisfaction of the Director. If necessary, the Director will initiate a modification or revocation of the CUP pursuant to County Code Chapter 22.238 (Modifications and Revocations).

**B. Neighborhood Impact (Need/Convenience Assessment)**

The Project Site is in a very remote area surrounded by USFS land and is not located near any other existing land uses. The surrounding area includes riding and hiking trails and wilderness land. The nearest existing residences and other land uses are miles away. As noted above, the draft conditions of approval include limits on the number of guests for the Project, so there will not be a significant increase in the number of people visiting the Project Site and using the USFS parking facilities associated with the Project. Therefore, the Project is not anticipated to have a significant impact on the surrounding area.

**C. Design Compatibility**

The existing land use's design is compatible with the surrounding wilderness area. The appurtenant facilities are small in scale, functional, and are designed to meet the basic needs of the amusement ride (bungee jumping) land use, including an office, storage containers and a storage building, a restroom, and a security booth. The existing land use will not be expanded or significantly modified. A new restroom facility with composting toilets will replace the existing outhouse, and minor changes may be made to existing structures.

**GENERAL PLAN/COMMUNITY PLAN CONSISTENCY**

The Project is consistent with applicable goals and policies of the General Plan and Area Plan. Consistency findings can be found in the attached Findings (Exhibit C – Findings).

The following General Plan policies apply to the proposed Project:

- *General Plan Economic Development Policy ED 1.1:* “Encourage a diverse mix of industries and services in each Planning Area.”

The Project is a unique business that has been providing recreational opportunities for the public for approximately 35 years and its continued operation will contribute to the range of services available in the Antelope Valley Planning Area.

- *General Plan Economic Development Policy ED 1.4:* “Encourage the expansion and retention of targeted industries and other growth economic sectors, such as the entertainment industry, aerospace industry, agriculture, transportation/logistics, healthcare, biomed/biotech, hospitality and tourism.”

The Project is a recreational business that contributes to tourism in the County, an important economic sector. The continued operation of this existing use, which has operated for approximately 35 years, will promote tourism in the County and contribute to economic activity for the Project and at other businesses in the County which support the visitors using the Project.

The following Area Plan policy applies to the proposed Project:

- *Area Plan Economic Development Policy ED 1.17:* “Promote uses and activities that rely on the natural state of the environment to take advantage of the vast areas of relatively undisturbed natural areas in the Antelope Valley. These include recreational, tourism and film-making uses.”

Bungee America is a small business that has operated on the Project Site for approximately 35 years and is part of the tourism sector, which is an important part of the economy of the County and the Southern California region. The Project promotes activities that rely on the natural environment and contributes to the tourism in the County.

### **ZONING ORDINANCE CONSISTENCY**

The Project complies with all applicable Zoning Code requirements, except for on-site parking requirements, which would be waived by the requested Variance. Consistency findings with further details can be found in the attached Findings (Exhibit C – Findings).

### **APPLICANT’S REQUIRED CUP AND VARIANCE FINDINGS**

The applicant is required to substantiate all facts identified by County Code Section 22.158.050.B (CUP Findings) and County Code Section 22.194.050.B (Variance Findings). The required CUP Findings and Variance Findings forms with the applicant’s responses are attached (Exhibit E – Applicant’s CUP Findings / Variance Findings). Staff is of the opinion that the applicant has met the required findings for the CUP and the Variance.

### **ENVIRONMENTAL ANALYSIS**

Staff recommends that this Project qualifies for Class 1 (Existing Facilities), Class 3 (New Construction or Conversion of Small Structures), Class 5 (Minor Alterations in Land Use Limitations), and Class 23 (Normal Operations of Facilities for Public Gatherings) Categorical Exemptions under State CEQA Guidelines Sections 15301, 15303, 15305, and 15323 and the County Environmental Document Reporting Procedures and Guidelines.

This Project will authorize an existing amusement ride (bungee jumping), a private heliport, and overnight camping with appurtenant facilities (a container used as a hangar to store a helicopter, two storage containers, a storage building, an office, a security booth, a restroom building with composting toilets, a removable shade canopy, a directional/informational sign, and fencing). No changes to the existing facilities are proposed except for a new 160-square-foot restroom building with composting toilets to replace the existing outhouse, a new 80-square-foot security booth, new fencing and a new gate, new signage, and new roofs with solar panels on existing structures. The existing outhouse will be converted into a storage structure. The proposed changes to the facilities are minor in scope and would not create any significant new impacts.

No expansion of the number of visitors is proposed, and the number of visitors will remain within the Project baseline that was based on the applicant's guest logs for the time period of 2013 to 2015. The Project will not have a significant effect on the environment. No development is proposed in a Significant Ecological Area or any other designated environmental resource area. The Project does not result in cumulative impacts, is not near a scenic highway, is not included on a list of hazardous waste sites, does not impact historic resources, and does not result in other significant effects on the environment. Therefore, no exceptions to the Categorical Exemptions mentioned above are applicable and the Project can be considered exempt. An environmental determination (Exhibit F – Environmental Determination) was issued for the Project.

### **COMMENTS RECEIVED**

#### **A. County Department Comments and Recommendations**

The Department of Public Works recommended clearance to public hearing with no conditions or comments in a letter dated January 30, 2024.

The Department of Public Health recommended clearance to public hearing with conditions in a letter dated August 22, 2024. The Department of Public Health's recommended conditions have been incorporated into the proposed conditions of approval.

The Fire Department recommended clearance to public hearing with conditions in a letter dated January 8, 2024. The Fire Department's recommended conditions have been incorporated into the proposed conditions of approval.

**B. Other Agency Comments and Recommendations**

The Federal Aviation Administration (“FAA”) issued a memorandum dated April 15, 2020, approving the private heliport. The FAA approval includes a condition to use of a non-obstructing safety barrier to ensure that unauthorized persons are restrained from access to the takeoff/landing area during helicopter flight operations. The FAA’s condition has been incorporated into the proposed conditions of approval.

DOSH issued a Certificate of Inspection for Bungee America, which functions as an approval, on December 7, 2023. This Certificate of Inspection was issued after DOSH conducted an inspection of safety-related systems and structural attributes of the amusement ride (bungee jumping) on November 26, 2023. During this inspection, DOSH did not note any deficiencies and determined that the ride complied with their requirements. The DOSH approval expires on October 7, 2025. As noted above, DOSH has issued Certificates of Inspection for the amusement ride (bungee jumping) since 1993 and inspections are conducted and certificates are renewed on an annual basis.

**C. Public Comments**

Staff received comments from members of the public regarding the Project between 2016 and 2022. These comments opposed the Director’s approval of a CHW and the continued operation of the amusement ride (bungee jumping), private heliport, and appurtenant facilities on the Project Site. These comments raised numerous concerns regarding safety, impacts to the environment, sanitation and waste disposal, parking, and the use of a helicopter. Staff received another comment in 2024 opposing the Project due to concerns with waste disposal, trash, traffic, parking, and other concerns. These comments are attached (Exhibit L – Correspondence).

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Report  
Reviewed By:

  
\_\_\_\_\_  
Samuel Dea, Supervising Regional Planner

Report  
Approved By:

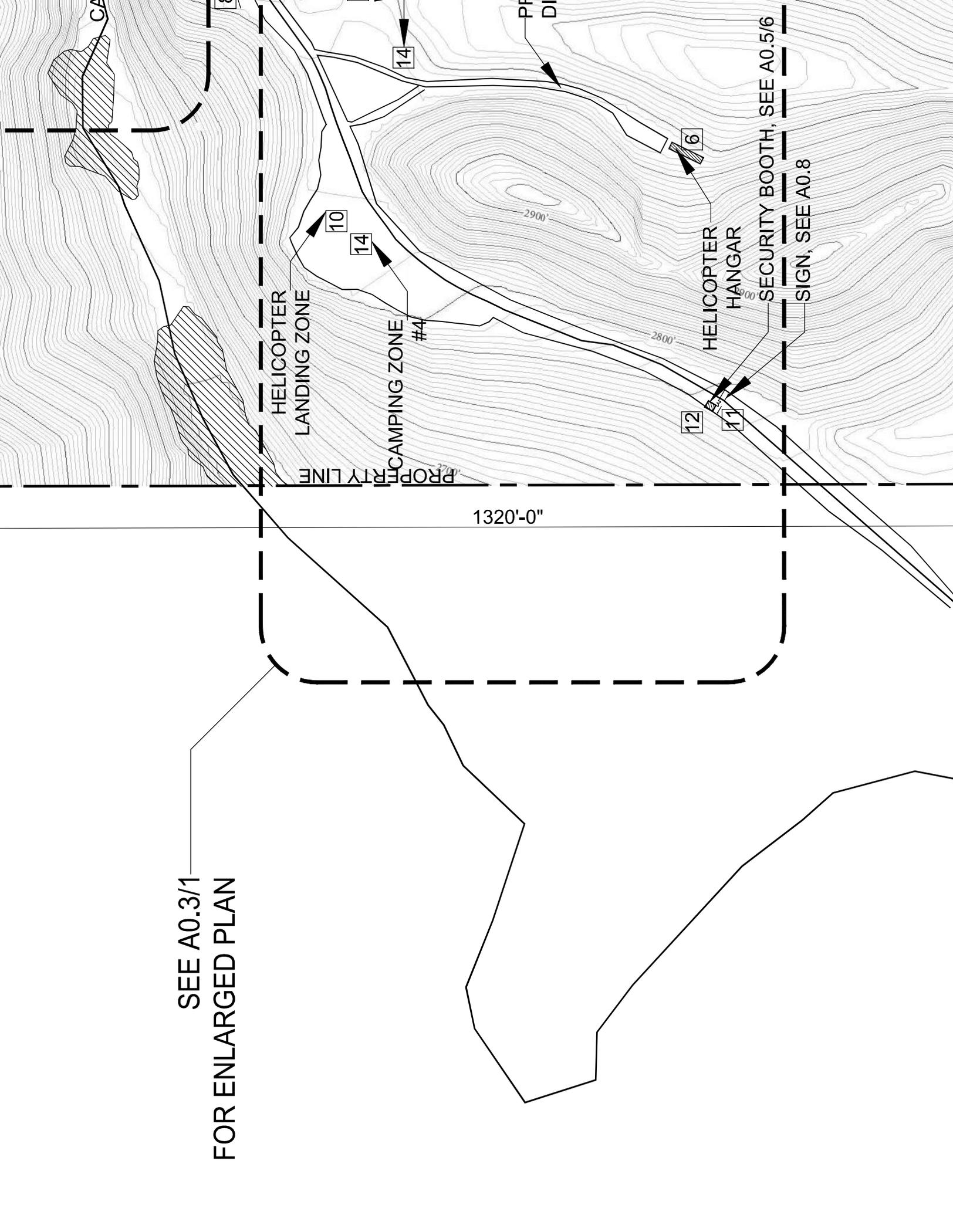
  
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Mitch Glaser, Assistant Deputy Director

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LIST OF ATTACHED EXHIBITS	
EXHIBIT A	Plans
EXHIBIT B	Project Summary Sheet
EXHIBIT C	Draft Findings
EXHIBIT D	Draft Conditions of Approval
EXHIBIT E	Applicant’s CUP Findings/ Variance Findings
EXHIBIT F	Environmental Determination
EXHIBIT G	Informational Maps

EXHIBIT H	Photos
EXHIBIT I	Public Works letter
EXHIBIT J	Public Health letter
EXHIBIT K	Fire letter
EXHIBIT L	Correspondence
EXHIBIT M	CHW 2024 Time Extension
EXHIBIT N	FAA Heliport approval
EXHIBIT O	2024-2025 DOSH Certificate of Inspection

SEE A0.3/1  
FOR ENLARGED PLAN

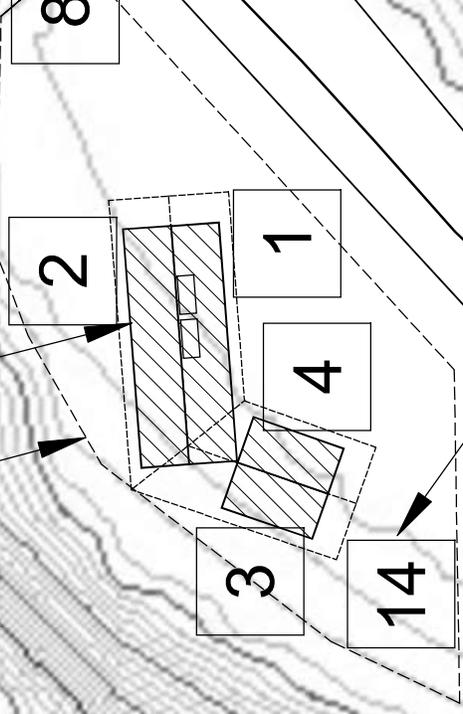


BUNGEE AMERICA  
BASECAMP  
STORAGE CONTAINERS  
FENCE  
SEE A0.5/4 FOR DETAIL

2700'

2700'

2800'



E. FORK SAN GABRIEL RIVER

14

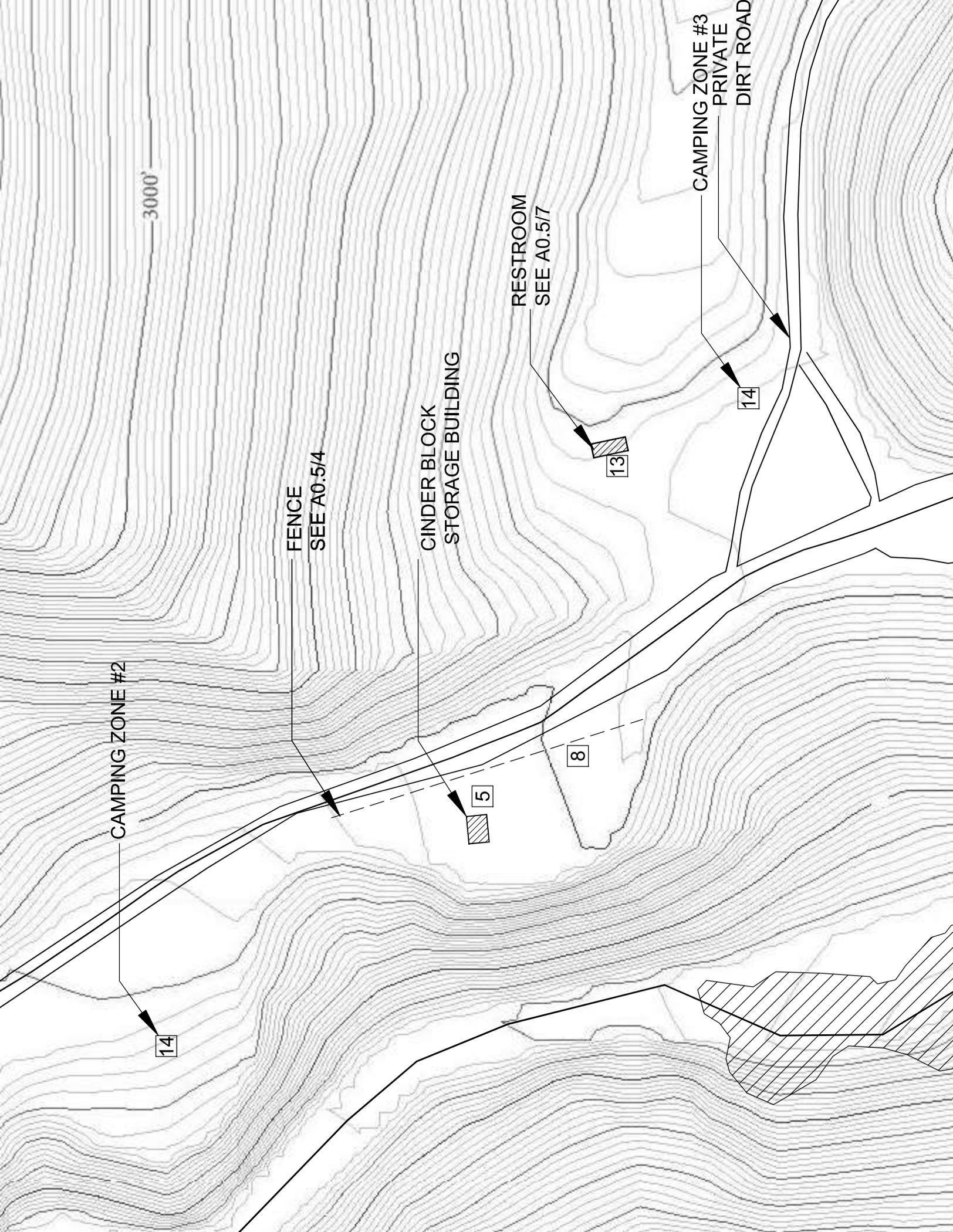
CAMPING ZONE  
#2



PRIVATE DIRT ROAD

2900'

TRAIL



3000'

CAMPING ZONE #2

FENCE  
SEE A0.5/4

CINDER BLOCK  
STORAGE BUILDING

RESTROOM  
SEE A0.5/7

CAMPING ZONE #3  
PRIVATE  
DIRT ROAD

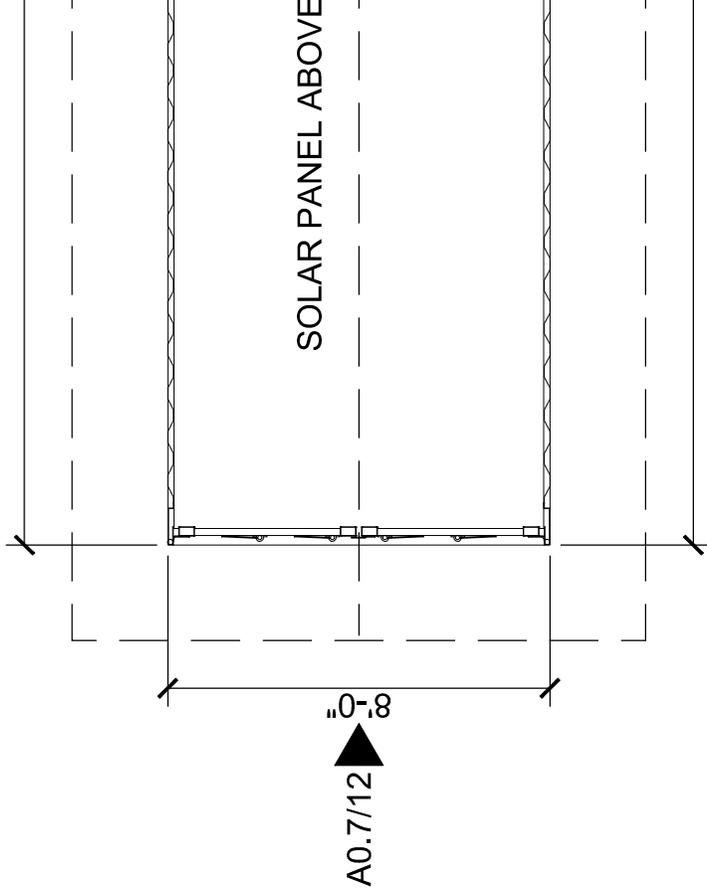
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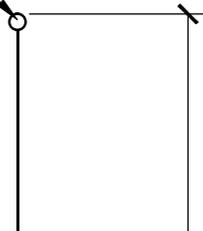
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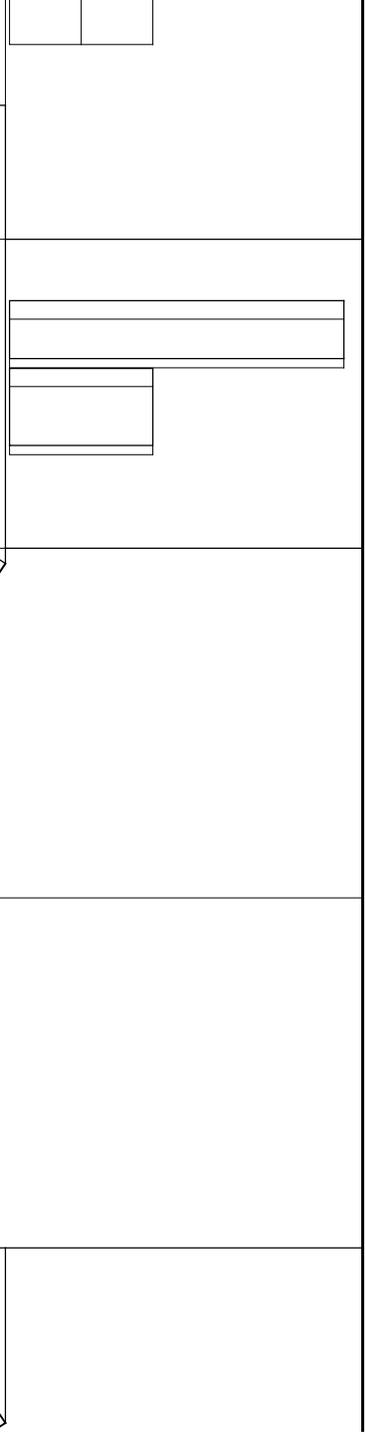
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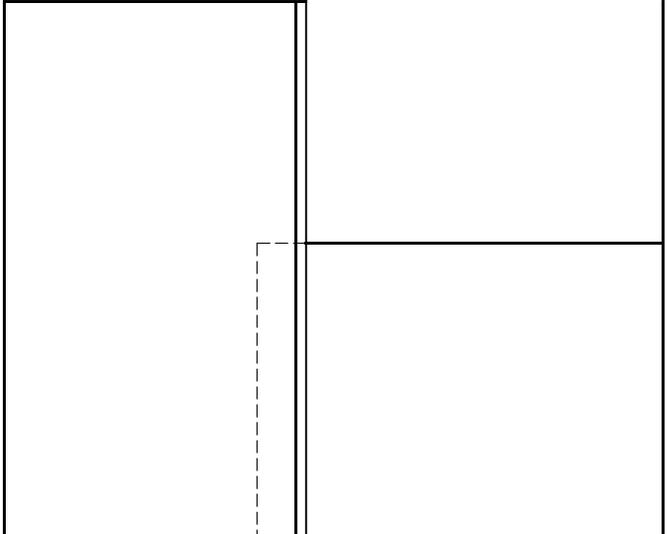
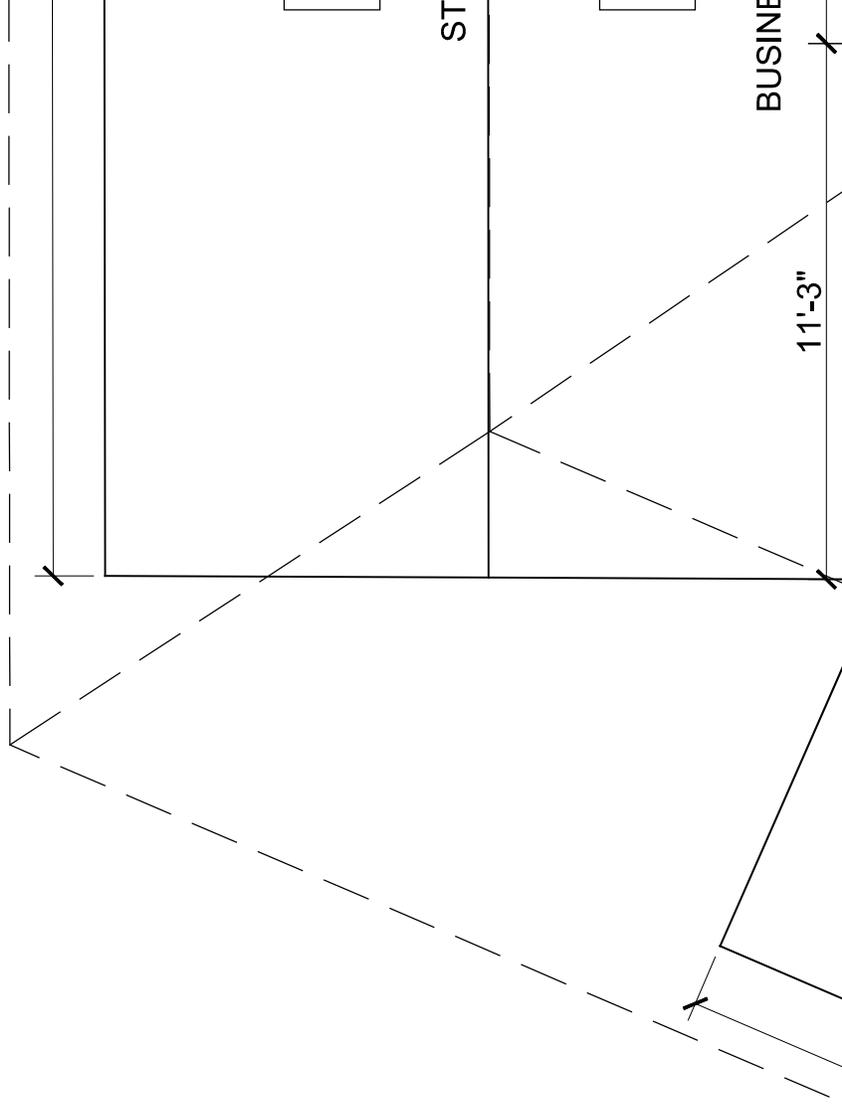
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SIGN POST

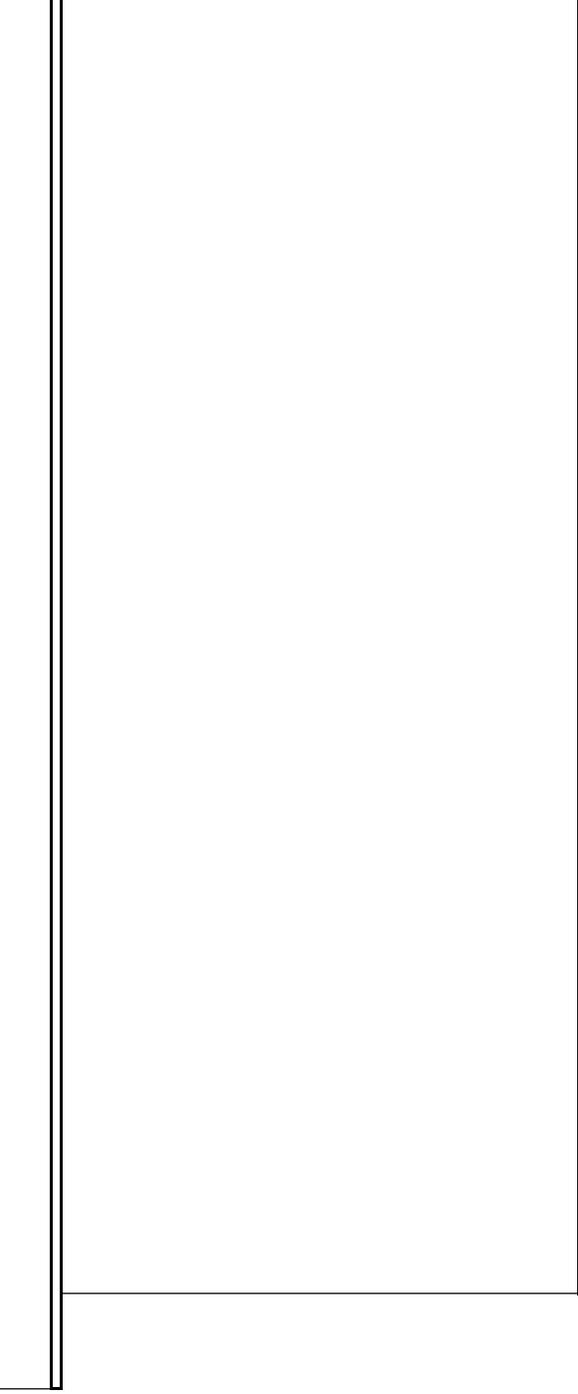
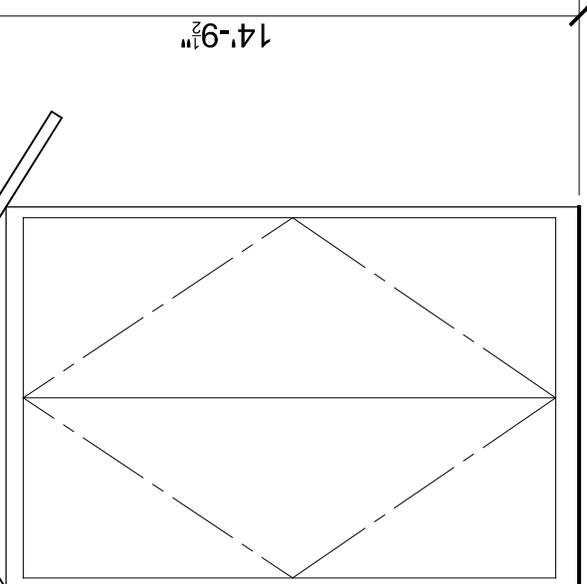




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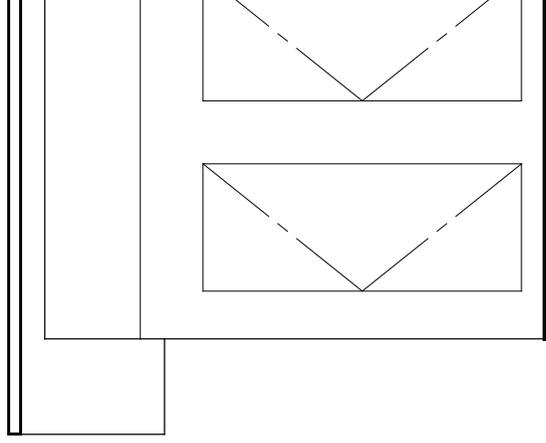
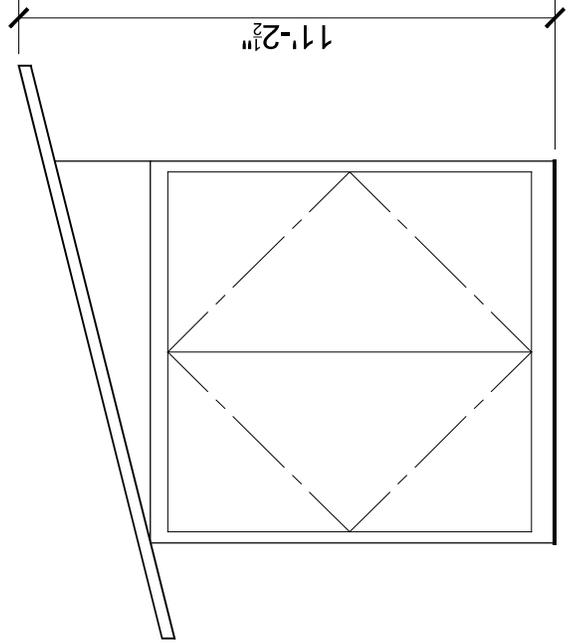
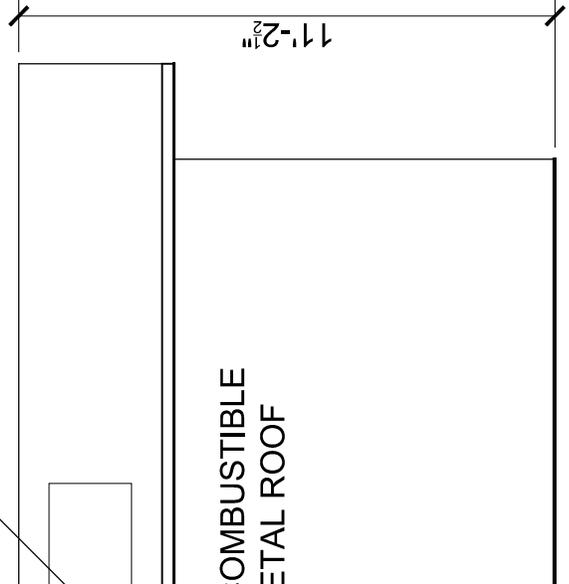
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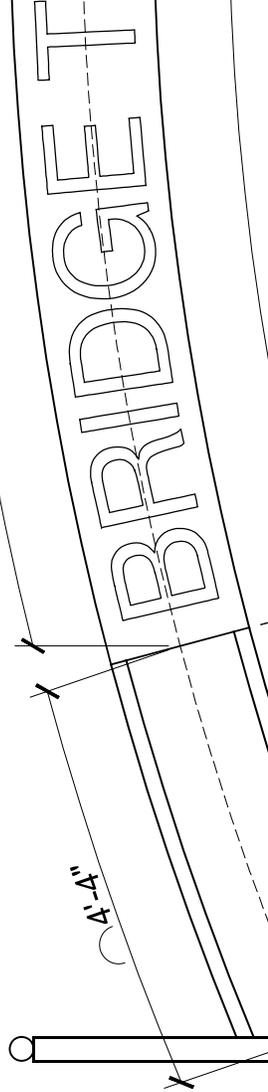


# ELEVATION

SCALE:  $\frac{1}{4}'' = 1'-0''$

SOLAR PANEL





**PROJECT NUMBER**

2018-003069-(5)

**HEARING DATE**

September 11, 2024

**REQUESTED ENTITLEMENT(S)**

Conditional Use Permit No. No. RPPL2018004676  
 Variance No. RPPL2018004861

## PROJECT SUMMARY

**OWNER / APPLICANT**

Saunders Mine LLC/Bungee America, Inc.

**MAP/EXHIBIT DATE**

August 19, 2024

**PROJECT OVERVIEW**

The applicant, Bungee America, Inc. (“Applicant”), is requesting a Conditional Use Permit (“CUP”) to authorize an amusement ride (bungee jumping), a private heliport, and overnight camping with appurtenant facilities (a container used as a hangar to store a helicopter, two storage containers, a storage building, an office, a security booth, a restroom building with composting toilets, a removable shade canopy, a directional/informational sign, and fencing) (“Project”) in the C-R (Commercial Recreation) Zone. The Project is categorically exempt (Class 1 - Existing Facilities, Class 3 - New Construction or Conversion of Small Structures, Class 5 - Minor Alterations in Land Use Limitations, and Class 23 - Normal Operations of Facilities for Public Gatherings) pursuant to CEQA reporting requirements.

The Applicant is also requesting a Variance to waive the parking requirements for the Project.

**LOCATION**

Assessor’s Parcel Numbers 8678-002-015 and 8678-002-016, a private inholding within the Angeles National Forest also known as the Bridge to Nowhere

**ACCESS**

East Fork Trail, a horse riding and hiking trail that starts at the end of Camp Bonita Prairie Forks Road, also known as Camp Bonita Road, which is the nearest public road to the Project Site

**ASSESSOR’S PARCEL NUMBERS**

8678-002-015 and 8678-002-016

**SITE AREA**

50 Acres

**GENERAL PLAN / LOCAL PLAN**

Antelope Valley Area Plan

**ZONED DISTRICT**

San Gabriel Watershed

**LAND USE DESIGNATION**

CR (Rural Commercial)

**ZONE**

C-R

**PROPOSED UNITS**

N/A

**MAX DENSITY/UNITS**

N/A

**COMMUNITY STANDARDS DISTRICT**

N/A

**ENVIRONMENTAL DETERMINATION (CEQA)**

Class 1 - Categorical Exemption – Existing Facilities  
 Class 3 - Categorical Exemption – New Construction or Conversion of Small Structures  
 Class 5 - Categorical Exemption – Minor Alterations in Land Use Limitations  
 Class 23 - Categorical Exemption – Normal Operations of Facilities for Public Gatherings

**KEY ISSUES**

- Consistency with the General Plan & Antelope Valley Area Plan
- Satisfaction of the following Section(s) of Title 22 of the Los Angeles County Code:
  - 22.20.030.C (Land Use Regulations for Commercial Zones)
  - 22.158.050.B (CUP Findings)
  - 22.194.050.B (Variance Findings)
  - 22.80.010 through 22.80.100 (Rural Outdoor Lighting District)

**CASE PLANNER:**

Richard Claghorn

**PHONE NUMBER:**

(213) 893-7015

**E-MAIL ADDRESS:**

rclaghorn@planning.lacounty.gov

**LOS ANGELES COUNTY  
DEPARTMENT OF REGIONAL PLANNING  
DRAFT FINDINGS OF THE REGIONAL PLANNING COMMISSION  
AND ORDER**

**PROJECT NO. 2018-003069-(5)  
CONDITIONAL USE PERMIT NO. RPPL2018004676  
VARIANCE NO. RPPL2018004861**

**RECITALS**

1. **HEARING DATE(S).** The Los Angeles County (“County”) Regional Planning Commission (“Commission”) conducted a duly-noticed public hearing in the matter of Conditional Use Permit (“CUP”) No. RPPL2018004676 and Variance No. RPPL2018004861 (“Variance”) on September 11, 2024.
2. **HEARING PROCEEDINGS.** *Reserved.*
3. **ENTITLEMENTS REQUESTED.** The permittee, Bungee America, Inc. (“Permittee”), requests the CUP to authorize an amusement ride (bungee jumping), a private heliport, and overnight camping with appurtenant facilities (a container used as a hangar to store a helicopter, two storage containers, a storage building, an office, a security booth, a restroom building with composting toilets, a removable shade canopy, a directional/informational sign, and fencing) (“Project”) in the C-R (Commercial Recreation) Zone pursuant to County Code Section 22.20.030 (Land Use Regulations for Commercial Zones). The Permittee requests the Variance to waive the parking requirements for the Project pursuant to County Code Section 22.194.020 (Variances – Applicability).

The Project is located on Assessor’s Parcel Numbers (“APNs”) 8678-002-015 and 8678-002-016, which is a private inholding with the Angeles National Forest along the East Fork Trail (“Trail”), also known as the Bridge to Nowhere (“Project Site”). No changes to the existing facilities are proposed except for a new 160-square-foot restroom building with composting toilets to replace the existing outhouse, a new 80-square-foot security booth, new fencing and a new gate, new signage, and new roofs with solar panels on existing structures. The existing outhouse will be converted into a storage structure. The proposed changes to the facilities are minor in scope and would not create any significant new impacts.

4. **PREVIOUS ENTITLEMENTS.** There are no previous County approvals for the existing amusement ride (bungee jumping) and the existing private heliport. The Permittee established a bungee jumping business on the Project Site in 1989 and has operated the existing private heliport as an accessory land use. Since 1993, the applicant has had permits to operate an amusement ride (bungee jumping) at the Project Site issued by the State of California Department of Industrial Relations’ Division of Occupational Safety and Health (“DOSH”). The permits from DOSH are renewed annually. The Federal Aviation Administration (“FAA”) issued a memorandum dated April 15, 2020, approving the private heliport. However, the applicant did not obtain County approval for these land uses.

Certificate of Compliance No. RPPL2018004675 was recorded on September 9, 2019, to certify the legality of the Project Site parcels and to hold them together as one parcel.

5. **LOCATION.** The Project Site consists of APNs 8678-002-015 and 8678-002-016 and is a private inholding with the Angeles National Forest along the Trail, also known as the Bridge to Nowhere. The Project Site is within the San Gabriel Watershed Zoned District and the Antelope Valley Planning Area.
6. **LAND USE DESIGNATION.** The Project Site is located within the CR (Rural Commercial) land use designation of the Antelope Valley Area Plan (“Area Plan”) Land Use Policy Map, a component of the General Plan.
7. **ZONING.** The Project Site is currently zoned C-R. Pursuant to County Code Section 22.20.030.C (Land Use Regulations for Commercial Zones), a CUP is required for an amusement ride and a private heliport in the C-R Zone and a Ministerial Site Plan Review (“SPR”) is required for a campground in the C-R Zone.

**8. SURROUNDING LAND USES AND ZONING**

LOCATION	ANTELOPE VALLEY AREA PLAN LAND USE POLICY	ZONING	EXISTING USES
NORTH	OS-NF (Open Space – National Forest)	W (Watershed)	National Forest
EAST	OS-NF	W	National Forest
SOUTH	OS-NF	W	National Forest
WEST	OS-NF	W	National Forest

**9. PROJECT AND SITE PLAN DESCRIPTION.**

**A. Existing Site Conditions**

The Project Site is 50 gross acres (50 net acres) in size and is one legal parcel that consists of APNs 8678-002-015 and 8678-002-016. Although the Project Site consists of two APNs, Certificate of Compliance No. RPPL2018004675 was recorded on September 9, 2019, which certified the legality of the Project Site parcels and held them together as one parcel. The Project Site is shaped like two connected rectangles with mountainous topography. The western portion of the Project Site is APN 8678-002-015, which is rectangular in shape, 20 acres in area, and has a width from east to west of 660 feet and a length from north to south of 1,320 feet, an area of 20 acres. The eastern portion of the Project Site is APN 8678-002-016, which is rectangular in shape, 30 acres in area, and has a width from east to west of 660 feet and a length from north to south of 1,980 feet. The eastern portion of the Project Site extends 660 feet further north than the western portion. The Project Site is located entirely within a Very High Fire Hazard Severity Zone. Nearly the entire Project Site is in a Hillside Management Area with natural slopes of 25 percent or greater. The Project Site contains the Bridge to Nowhere, an office,

storage containers, a cinder block outhouse, a cargo container used as a helicopter hangar, and a helicopter landing zone.

**B. Site Access**

The Project Site is accessible from the Trail, a horse riding and hiking trail that starts at the end of Camp Bonita Prairie Forks Road, also known as Camp Bonita Road, which is the nearest public road to the Project Site. The Camp Bonita Road public right-of-way is 60 feet wide. The trailhead of the Trail is located at a parking lot on land owned by the United States Forest Service ("USFS") at the end of Camp Bonita Road.

**C. Site Plan**

The site plan depicts the features of the Project Site. The Trail enters the Project Site on the west side. A new 80-square-foot security booth is proposed near the portion of the Trail located on the property, approximately 80 feet from the western lot line and 420 feet from the southern lot line. A gate is proposed next to the security booth on the Trail to identify the access point to the Project Site.

The Trail continues past the security booth to a helicopter landing zone, which is on a relatively flat area approximately 400 feet northeast of the booth. A private dirt road branches off from the Trail and leads to the helicopter hangar, which is a 320-square-foot cargo container located approximately 400 feet south of the Trail. A proposed 160-square-foot restroom building will be located near the junction of the Trail and the private dirt road. It will contain two composting toilets and will replace the existing outhouse. The composting toilets will compost solid human waste on-site and divert urine to a separate holding tank. Liquid waste will be transported off-site for disposal at an approved disposal facility. The restroom building will replace the existing outhouse, which is an approximately 182-square-foot cinder block structure located near the Trail approximately 210 feet north of the proposed restroom building. The existing outhouse will be converted to a storage building.

The Trail continues in a northeasterly direction from the cinder block storage building to the Bridge to Nowhere, which is located in the northeastern portion of the Project Site. The bridge is approximately 170 feet in length and is approximately 70 feet west of the eastern property line. There is a removable canopy structure on the bridge that is approximately 26 feet by 40 feet. An existing 640-square-foot office building made up of two cargo containers is located west of the bridge. Two existing smaller cargo containers used for storage, with a combined area of 256 square feet, are located southwest of the office and adjoin it. A new non-combustible metal roof is proposed over the office and storage area which will connect the office and storage area and will have solar panels. New non-combustible metal roofs with solar panels are also proposed on the existing container used as a hangar, the proposed restroom building, and the proposed security booth.

**D. Parking**

There is no parking provided on the Project Site since it has no road access to accommodate an automobile. The Permittee requested the Variance to waive the parking requirements for the Project because it is not possible to provide parking on the Project Site, providing a new off-site parking lot is not feasible because there are no available parking lots nearby for lease, and there is existing parking available at the trailhead for users of the Angeles National Forest. The trailhead parking lot is on land owned by the USFS at the end of Camp Bonita Road. Parking at this lot and along nearby roadways is permitted with a USFS Adventure Pass. The distance from the trailhead of the Trail to the Project Site is approximately five miles.

- 10. CEQA DETERMINATION.** Prior to the Commission's public hearing on the Project, County Department of Regional Planning ("LA County Planning") staff ("Staff") determined that the Project qualified for Class 1 (Existing Facilities), Class 3 (New Construction or Conversion of Small Structures), Class 5 (Minor Alterations in Land Use Limitations), and Class 23 (Normal Operations of Facilities for Public Gatherings) Categorical Exemptions under State CEQA Guidelines Sections 15301, 15303, 15305, and 15323 and the County Environmental Document Reporting Procedures and Guidelines.

This Project will authorize an existing amusement ride (bungee jumping), a private heliport, and overnight camping with appurtenant facilities (a container used as a hangar to store a helicopter, two storage containers, a storage building, an office, a security booth, a restroom building with composting toilets, a removable shade canopy, a directional/informational sign, and fencing). No changes to the existing facilities are proposed except for a new 160-square-foot restroom building with composting toilets to replace the existing outhouse, a new 80-square-foot security booth, new fencing and a new gate, new signage, and new roofs with solar panels on existing structures. The existing outhouse will be converted into a storage structure. The proposed changes to the facilities are minor in scope and would not create any significant new impacts.

No expansion of the number of visitors is proposed, and the number of visitors will remain within the Project baseline that was based on the applicant's guest logs for the time period of 2013 to 2015. The Project will not have a significant effect on the environment. No development is proposed in a Significant Ecological Area or any other designated environmental resource area. The Project does not result in cumulative impacts, is not near a scenic highway, is not included on a list of hazardous waste sites, does not impact historic resources, and does not result in other significant effects on the environment. Therefore, no exceptions to the Categorical Exemptions mentioned above are applicable and the Project can be considered exempt.

- 11. PUBLIC COMMENTS.** Staff received comments from members of the public regarding the Project between 2016 and 2022. These comments opposed the Director of Regional Planning's ("Director's") approval of a Clean Hands Waiver pursuant to County Code Section 22.02.070 (Application Where Violation Exists) and the

continued operation of the amusement ride (bungee jumping), private heliport, and appurtenant facilities on the Project Site. These comments raised numerous concerns regarding safety, impacts to the environment, sanitation and waste disposal, parking, and the use of a helicopter. Staff received another comment in 2024 opposing the Project due to concerns with waste disposal, trash, traffic, parking, and other concerns.

## **12. AGENCY RECOMMENDATIONS.**

- A. The County Department of Public Works recommended clearance to public hearing with no conditions or comments in a letter dated October 2, 2023.
- B. The County Fire Department recommended clearance to public hearing with conditions in a letter dated January 8, 2024. The Fire Department's recommended conditions have been incorporated into the conditions of Project approval.
- C. County Department of Public Health recommended clearance to public hearing with conditions in a letter dated August 22, 2024. The Department of Public Health's recommended conditions have been incorporated into the conditions of Project approval.
- D. DOSH issued a Certificate of Inspection for Bungee America, which functions as an approval, on December 7, 2023. This Certificate of Inspection was issued after DOSH conducted an inspection of safety-related systems and structural attributes of the amusement ride (bungee jumping) on November 26, 2023. During this inspection, DOSH did not note any deficiencies and determined that the ride complied with their requirements. The DOSH approval expires on October 7, 2025. DOSH has issued Certificates of Inspection for the amusement ride (bungee jumping) since 1993 and inspections are conducted and certificates are renewed on an annual basis.
- E. The FAA issued a memorandum dated April 15, 2020, approving the private heliport. The FAA approval includes a condition to use of a non-obstructing safety barrier to ensure that unauthorized persons are restrained from access to the takeoff/landing area during helicopter flight operations. The FAA's condition has been incorporated into the conditions of Project approval.

- 13. LEGAL NOTIFICATION.** Pursuant to County Code Section 22.222.120 (Public Hearing Procedure), the community was properly notified of the public hearing by mail, newspaper (*Antelope Valley Press*), and property posting. Additionally, the Project was noticed and case materials were available on LA County Planning's website. On July 24, 2024, a total of three Notices of Public Hearing were mailed to all property owners as identified on the County Assessor's record within a 1,000-foot radius from the Project Site, as well as two notices to those on the courtesy mailing list for the San Gabriel Watershed Zoned District. Notices were also emailed to four persons who had requested email notification.

### **GENERAL PLAN CONSISTENCY FINDINGS**

14. **LAND USE POLICY.** The Commission finds that the Project is consistent with the Area Plan's Land Use Policy Map. The Project Site is in the CR land use designation. The CR land use designation identifies lands in the planning area that are designated for limited, low-intensity commercial uses that are compatible with rural and agricultural activities. Specific allowable uses are determined by the underlying zoning designation. The C-R Zone allows amusement rides and private heliports with a CUP and allows campgrounds with a Ministerial SPR.

15. **GOALS AND POLICIES.** The Commission finds that the Project is consistent with the goals and policies of the General Plan. The following General Plan policies apply to the Project:

- *General Plan Economic Development Policy ED 1.1:* "Encourage a diverse mix of industries and services in each Planning Area."

The Project is a unique business that has been providing recreational opportunities for the public for approximately 35 years and its continued operation will contribute to the range of services available in the Antelope Valley Planning Area.

- *General Plan Economic Development Policy ED 1.4:* "Encourage the expansion and retention of targeted industries and other growth economic sectors, such as the entertainment industry, aerospace industry, agriculture, transportation/logistics, healthcare, biomed/biotech, hospitality and tourism."

The Project is a recreational business that contributes to tourism in the County, an important economic sector. The continued operation of this existing use, which has operated for approximately 35 years, will promote tourism in the County and contribute to economic activity for the Project and at other businesses in the County which support the visitors using the Project.

16. The Commission finds that the Project is consistent with the goals and policies of the Area Plan. The following Area Plan policy applies to the Project:

- *Area Plan Economic Development Policy ED 1.17:* "Promote uses and activities that rely on the natural state of the environment to take advantage of the vast areas of relatively undisturbed natural areas in the Antelope Valley. These include recreational, tourism and film-making uses."

Bungee America is a small business that has operated on the Project Site for approximately 35 years and is part of the tourism sector, which is an important part of the economy of the County and the Southern California region. The Project promotes activities that rely on the natural environment and contributes to the tourism in the County.

### **ZONING CODE CONSISTENCY FINDINGS**

17. **PERMITTED USE IN ZONE.** The Commission finds that the Project is consistent with the C-R zoning classification because an amusement ride and a private heliport are permitted in such zone with a CUP and a campground is permitted in such zone with a Ministerial SPR pursuant to County Code Section 22.20.030.C (Land Use Regulations for Commercial Zones).
18. **C-R ZONE DEVELOPMENT STANDARDS.** The Commission finds that the Project complies with the required C-R Zone Development Standards. Pursuant to County Code Section 22.20.040 (Development Standards for Commercial Zones), there are no required yards, no minimum required landscaping area, and no maximum lot coverage in the C-R Zone. The only development standard listed for the C-R Zone is maximum building height, which is 13 times the buildable area. The Project complies with the maximum building height.
19. **SIGNS.** The Commission finds that the existing signage on the Project Site is consistent with County Code requirements. The Project Site is not allowed to have any wall business signs pursuant to County Code Section 22.114.110 (Wall Business Signs) or any roof or freestanding business signs pursuant to County Code Section 22.114.120 (Roof and Freestanding Business Signs) because it does not have any street frontage. However, it is permitted to have directional or informational signs pursuant to County Code Section 22.114.190 (Directional or Informational Signs). Such directional or informational signs may not exceed 24 square feet in sign area or 12 feet in height. The Project Site contains several existing directional or informational signs to identify the property, to warn against hazards, to provide rules to be followed by visitors to the property, to warn against trespassing in restricted areas, and other information for the public. These existing signs qualify as directional or informational signs and comply with the standards for such signs. The proposed sign near the security booth shown on the Exhibit "A" presented at the public hearing is also classified as a freestanding directional or informational sign, as it identifies the Project Site. The proposed sign complies with the applicable signage standards.
20. **PARKING.** The Commission finds that the Project Site does not meet the minimum requirement for on-site parking pursuant to County Code Section 22.112.070 (Required Parking Spaces). However, a Variance to waive the parking requirement for the Project is justified because of the apparent unique circumstances and physical characteristics of the Project Site pursuant to County Code Section 22.194.050 (Variance Findings).

The Project Site is approximately five miles from the nearest public road, which is Camp Bonita Road. There is a parking lot at the trailhead of the Trail available to hikers of the Trail, which leads from the trailhead to the Project Site. The parking lot at the trailhead at the end of Camp Bonita Road has 33 parking spaces and is on land owned by the USFS. This parking lot is available to hikers of the Trail, which is on USFS land, except for the portion traversing the Project Site, which is owned by the Permittee. There are also additional parking spaces along Camp Bonita Road and

other nearby roadways such as East Fork Road and Glendora Mountain Road. Vehicles using the parking lot and the parking areas along the side of Camp Bonita Road are required to display a USFS Adventure Pass. The Permittee is an authorized vendor of Adventure Passes on behalf of the USFS and has been for decades.

There is no parking requirement specified for amusement rides in County Code Section 22.112.070 (Required Parking Spaces). County Code Section 22.112.070 (Required Parking Spaces – Uses Not Specified) states, “Where parking requirements for any use are not specified, parking shall be provided in an amount that the Director finds adequate to prevent traffic congestion and excessive on-street parking. Whenever practical, such determination shall be based upon the requirements for the most comparable use specified in this Chapter (County Code Chapter 22.12 (Parking)).” Pursuant to County Code Section 22.112.070 (Required Parking Spaces), the parking requirement for places of amusement and entertainment, the most comparable listed land use, is based on a ratio of one parking space per three persons based on the occupant load of all indoor and outdoor areas, with a minimum of 10 spaces for each land use. There is no occupant load for this land use, but the average number of guests per day was used as a substitute to estimate the demand for parking.

The number of Bungee America guests averaged 7,701 per year during the years of 2013 to 2015. During this time period, there were 358 days when the Permittee held bungee jumping tours, with an average of 119 days per year with at least one tour. The average number of guests per day during the years of 2013 to 2015 was 65. The maximum number of guests in one day during the years of 2013 to 2015 was 177 and the highest number on a single tour was 144. The total number of days during the years of 2013 to 2015 with at least 100 guests was 58, while there were only five days during the same period with at least 150 guests.

Based on the average number of guests in a single day of 65 and a ratio of one space per three guests, a minimum of 22 parking spaces would be required. The Commission finds that a Variance to waive the parking requirement for the Project is justified pursuant to County Code Section 22.194.050 (Variance Findings), as explained further in Findings 25 through 28, below, because it is not possible to provide parking spaces on the Project Site, because there is a lack of alternative parking locations, and because the parking areas at the trailhead have been adequate to serve this use in the past.

The conditions of Project approval set limits on the maximum number of guests on a single tour, a single day, a single month, and a single calendar year. The conditions of Project approval also set limits on the number of overnight camping nights that may be conducted during a year, the number of guests allowed per camping night, and the number of camping guests per year. These limits are based on the data provided by the Permittee related to guests during the years of 2013 to 2015, which also established the baseline for the Project’s environmental analysis, as explained in Finding 10, above, and Finding 30, below. The conditions of Project approval require

the Permittee to maintain logs related to all of these limits and to provide them to Staff to ensure compliance with these limits.

Another condition of Project approval requires the Permittee to encourage guests to carpool or rideshare to the trailhead to minimize the number of cars parked in the vicinity of the trailhead. It also requires that the Permittee's website and any other promotional materials related to the Project to include a statement that encourages guests to carpool or rideshare to the trailhead.

21. **INCLUSIONARY UNITS.** The Commission finds that the Project is exempt from the Inclusionary Zoning Ordinance because the Project does not include any housing component.

### **CONDITIONAL USE PERMIT AND VARIANCE FINDINGS**

22. **The Commission finds that the proposed use at the site will not adversely affect the health, peace, comfort, or welfare of persons residing or working in the surrounding area; will not be materially detrimental to the use, enjoyment, or valuation of property of other persons located in the vicinity of the site; and will not jeopardize, endanger, or otherwise constitute a menace to the public health, safety, or general welfare.** The Project Site is in a very remote location, with no residences or places of employment for miles in all directions. Bungee America has an excellent safety record and has not had any known safety incidents since it began operating in 1989. Annual safety inspections are performed by DOSH to ensure that the land use remains safe. Bungee America staff regularly picks up trash along the trail to the Project Site and sponsors trail clean-up events. The Permittee has emergency communications equipment at the Project Site, which provides the ability to communicate in emergency situations in an area otherwise lacking in communication services due to the remote location. The private heliport on the Project Site was approved by the FAA. The helicopter is operated in compliance with FAA requirements and is needed for logistical support required by the Project Site's remoted location, including transport of waste and supplies. The helicopter is not used to transport guests. Helicopter flights are relatively infrequent.
23. **The Commission finds that the proposed site is adequate in size and shape to accommodate the yards, walls, fences, parking and loading facilities, landscaping and other development features prescribed in Title 22, or as is otherwise required in order to integrate said use with the uses in the surrounding area.** The Project Site has an area of 50 acres and there is ample space for all required development features. However, there is no parking provided on the Project Site due to the fact it is located five miles from the nearest public road and is inaccessible by automobiles. The Variance waived the parking requirements for the Project pursuant to Findings 25 through 28, below.
24. **The Commission finds that the proposed site is adequately served by highways or streets of sufficient width and improved as necessary to carry the kind and quantity of traffic such use would generate, and by other public or private service**

**facilities as are required.** The Project Site has no direct vehicular access and is approximately five miles from the nearest public road via the Trail. The trailhead is at the end of Camp Bonita Road, which is a 60-foot-wide County-maintained road that is adequate to serve the users of the Trail. There are limited services available at the Project Site. The Permittee operates a satellite phone with Wi-Fi for emergency communications.

There is currently an outhouse on the Project Site that will be replaced by a new restroom building with composting toilets. The composting toilets would allow for the composting of human solid waste on the Project Site while human liquid waste would be transported off the site by a helicopter. This change will reduce the amount of waste and will dispose the waste in a more efficient and environmentally sensitive way. The conditions of Project approval require periodic evaluations of the composting toilet system by a certified industrial hygienist throughout the grant term to ensure that it is functioning correctly to the satisfaction of the Director. If it is not functioning correctly, the conditions of Project approval require that the operation of the Project must cease until necessary repairs or modifications are made, inspected, and approved by a certified industrial hygienist to the satisfaction of the Director. If necessary, the Director will initiate a modification or revocation of the CUP pursuant to County Code Chapter 22.238 (Modifications and Revocations).

An estimated 20,000 public hikers per year use the Trail to access the Bridge to Nowhere in addition to the approximately 8,000 guests per year who participate in bungee jumping. The Permittee will continue to allow hikers of the public trail to access the Bridge to Nowhere on the Project Site although they are not required to do so, which provides a significant benefit to residents of, and visitors to, the County and the Southern California region who want to access the Bridge to Nowhere.

- 25. The Commission finds that because of special circumstances or exceptional characteristics applicable to the property, the strict application of the County Code deprives such property of privileges enjoyed by other property in the vicinity and under identical zoning classification.** The Project Site has special circumstances and exceptional characteristics that make a Variance necessary for the Project. The Project Site is located well within the boundary of the Angeles National Forest, has no means of vehicular access, and can only be reached using a hiking trail that is approximately five miles in length from the trailhead and Camp Bonita Road, which is the nearest public road. Therefore, the Permittee cannot provide parking spaces on the Project Site.

There is a parking lot on USFS land at the trailhead that is available to the public with the purchase of USFS Adventure Passes from authorized vendors. The Permittee is an authorized vendor of USFS Adventure Passes. Additional parking spaces along Camp Bonita Road are available if all spaces in the parking lot are occupied. USFS Adventure Passes are also required for parking along designated portions of Camp Bonita Road, which is also within USFS land. Although the parking lot and the parking spaces along designated portions of Camp Bonita Road are a five-mile hike in each direction from the Project Site, the Bungee America guests who choose to visit the

Project Site do so with the expectation of a long hike to and from the Project Site and the long hike is an important part of the recreational aspect of the experience and a key component of the Project.

There are no other properties with similar zoning for miles in all directions. There are no other known sites in the County which have similar circumstances to the Project Site.

**26. The Commission finds that the modification authorized will not constitute a grant of special privilege inconsistent with the limitations upon other properties in the vicinity and zone in which the property is situated.** There are no other properties in the vicinity with the same or similar zoning and no other private inholdings nearby. The Project Site is surrounded by USFS land for miles in all directions and has unique circumstances and characteristics that are not found elsewhere in the vicinity. There are no other known land uses in the County with similar circumstances and in a similarly remote location with no vehicular access for miles in all directions.

**27. The Commission finds that strict application of zoning regulations as they apply to such property will result in practical difficulties or unnecessary hardships inconsistent with the general purpose of such regulations and standards.** The Permittee explored alternatives to using the parking lot on USFS land at the trailhead and the parking spaces along designated portions of Camp Bonita Road but none of them were proven feasible. The Permittee contacted the owners of six properties on East Fork Road, the nearest road to Camp Bonita Road, regarding the possibility of providing off-site parking spaces for the Project. However, these locations had no available parking spaces, were not properly zoned for commercial parking, or the owners of these locations were not interested in selling or leasing any areas for parking. The Permittee also explored the possibility of operating a shuttle to provide transportation for guests. However, the shuttle option was found to be infeasible because of the excessive time that would be necessary for guests to wait for the shuttles. Therefore, continuing the current parking arrangement, which includes the parking lot on USFS land at the trailhead and the parking spaces along designated portions of Camp Bonita Road, is the only viable option to provide parking for the Project and ensure its continued operation.

Strict application of the parking requirements for the Project is not possible due to its remote location and physical constraints and would result in practical difficulties or unnecessary hardships inconsistent with the purpose of such standards. There are no feasible alternatives. The Project would be severely impacted because it cannot continue operating without relief from the parking requirements.

**28. The Commission finds that such adjustment will not be materially detrimental to the public health, safety, or general welfare, or to the use, enjoyment, or valuation of property of other persons located in the vicinity.** Bungee America guests have used the parking lot on USFS land at the trailhead and the parking spaces along designated portions of Camp Bonita Road since 1989, and the amount of parking available there has been sufficient to accommodate the Bungee America guests and

other users of the Trail. The conditions of project approval will limit the number of guests for Bungee America to avoid an increase above the baseline levels established during the years of 2013 to 2015. The Permittee's website and any other promotional materials related to the Project must include a statement that encourages guests to carpool or rideshare to the trailhead.

The surrounding properties within a wide radius of the Project Site and the Trail leading to it are on USFS land. The Project will continue operating in largely the same manner as it has for the past approximately 35 years, which would not be detrimental to the use, enjoyment or valuation of other properties or persons in the area. Visitors to the Project Site will be encouraged to carpool to minimize the parking demands at the parking lot on USFS land at the trailhead and the parking spaces along designated portions of Camp Bonita Road. The parking lot on USFS land at the trailhead and the parking spaces along designated portions of Camp Bonita Road will continue to be available to other visitors to the Angeles National Forest and all users of the parking lot and the parking spaces, including visitors to the Project Site, are required to display a USFS Adventure Pass purchased from the USFS or an authorized vendor.

29. The Commission finds that to ensure continued compatibility between the Project and the surrounding land uses, it is necessary to limit the CUP and Variance to a grant term of 20 years.

### **ENVIRONMENTAL FINDINGS**

30. The Commission finds that the Project is exempt from the California Environmental Quality Act pursuant to State CEQA Guidelines sections 15301 (Class 1, Existing Facilities categorical exemption), 15303 (Class 3, New Construction or Conversion of Small Structures categorical exemption), Class 5 (Minor Alterations in Land Use Limitations categorical exemption), and Class 23 (Normal Operations of Facilities for Public Gatherings categorical exemption) and the County Environmental Document Reporting Procedures and Guidelines.

This Project will authorize an existing amusement ride (bungee jumping), a private heliport, and overnight camping with appurtenant facilities (a container used as a hangar to store a helicopter, two storage containers, a storage building, an office, a security booth, a restroom building with composting toilets, a removable shade canopy, a directional/informational sign, and fencing). No changes to the existing facilities are proposed except for a new 160-square-foot restroom building with composting toilets to replace the existing outhouse, a new 80-square-foot security booth, new fencing and a new gate, new signage, and new roofs with solar panels on existing structures. The existing outhouse will be converted into a storage structure. The proposed changes to the facilities are minor in scope and would not create any significant new impacts.

No expansion of the number of visitors is proposed, and the number of visitors will remain within the Project baseline that was based on the applicant's guest logs for the time period of 2013 to 2015. The Project will not have a significant effect on the environment. No development is proposed in a Significant Ecological Area or any

other designated environmental resource area. The Project does not result in cumulative impacts, is not near a scenic highway, is not included on a list of hazardous waste sites, does not impact historic resources, and does not result in other significant effects on the environment. Therefore, the Commission finds that no exceptions to the Categorical Exemptions mentioned above are applicable and the Project is considered exempt.

### **ADMINISTRATIVE FINDINGS**

**31. LOCATION OF DOCUMENTS.** The location of the documents and other materials constituting the record of proceedings upon which the Commission's decision is based in this matter is at LA County Planning, 13th Floor, Hall of Records, 320 West Temple Street, Los Angeles, California 90012. The custodian of such documents and materials shall be the Section Head of the North County Development Services Section, LA County Planning.

### **BASED ON THE FOREGOING, THE COMMISSION CONCLUDES THAT:**

- A. The proposed use, with the conditions of Project approval, will be consistent with the adopted General Plan and Area Plan.
- B. The proposed use at the site will not adversely affect the health, peace, comfort or welfare of persons residing or working in the surrounding area, will not be materially detrimental to the use, enjoyment or valuation of property of other persons located in the vicinity of the site, and will not jeopardize, endanger or otherwise constitute a menace to the public health, safety or general welfare.
- C. The proposed site is adequate in size and shape to accommodate the yards, walls, fences, parking and loading facilities, landscaping and other development features prescribed in Title 22, or as is otherwise required in order to integrate said use with the uses in the surrounding area.
- D. The proposed site is adequately served by highways or streets of sufficient width and improved as necessary to carry the kind and quantity of traffic such use would generate, and by other public or private service facilities as are required.
- E. Because of special circumstances or exceptional characteristics applicable to the property, the strict application of the County Code deprives such property of privileges enjoyed by other property in the vicinity and under identical zoning classification.
- F. The modification authorized will not constitute a grant of special privilege inconsistent with the limitations upon other properties in the vicinity and zone in which the property is situated.
- G. Strict application of zoning regulations as they apply to such property will result in practical difficulties or unnecessary hardships inconsistent with the general purpose of such regulations and standards.

- H. Such adjustment will not be materially detrimental to the public health, safety, or general welfare, or to the use, enjoyment, or valuation of property of other persons located in the vicinity.

**THEREFORE, THE COMMISSION:**

1. Finds that the Project is exempt from the California Environmental Quality Act pursuant to State CEQA Guidelines sections 15301 (Class 1, Existing Facilities categorical exemption), 15303 (Class 3, New Construction or Conversion of Small Structures categorical exemption), 15305 (Class 5, Minor Alterations in Land Use Limitations categorical exemption), and 15323 (Class 23, Normal Operations of Facilities for Public Gatherings categorical exemption); and
2. Approves **CONDITIONAL USE PERMIT NO. RPPL2018004676** and **VARIANCE NO. RPPL2018004861** subject to the attached conditions.

**ACTION DATE: September 11, 2024**

MG:SZD:RWC

August 29, 2024

LOS ANGELES COUNTY  
DEPARTMENT OF REGIONAL PLANNING

DRAFT CONDITIONS OF APPROVAL  
PROJECT NO. 2018-003069-(5)  
CONDITIONAL USE PERMIT NO. RPPL2018004676  
VARIANCE NO. RPPL2018004861

**PROJECT DESCRIPTION**

The project consists of a Conditional Use Permit (“CUP”) to authorize an amusement ride (bungee jumping), a private heliport, and overnight camping with appurtenant facilities (a container used as a hangar to store a helicopter, two storage containers, a storage building, an office, a security booth, a restroom building with composting toilets, a removable shade canopy, a directional/informational sign, and fencing) on a private inholding within the Angeles National Forest along the East Fork Trail, also known as the Bridge to Nowhere, in the C-R (Commercial Recreation) Zone (“Project Site”), and a Variance to waive the on-site parking requirements subject to the following conditions of approval:

**GENERAL CONDITIONS**

1. Unless otherwise apparent from the context, the term “Permittee” shall include the applicant, owner of the property, and any other person, corporation, or other entity making use of this grant.
2. This grant shall not be effective for any purpose until the Permittee, and the owner of the subject property if other than the Permittee, have filed at the office of the Los Angeles County (“County”) Department of Regional Planning (“LA County Planning”) their affidavit stating that they are aware of and agree to accept all of the conditions of this grant, and that the conditions of the grant have been recorded as required by Condition No. 6, and until all required monies have been paid pursuant to Condition No. 9. Notwithstanding the foregoing, this Condition No. 2 and Condition Nos. 3, 4, and 8 shall be effective immediately upon the date of final approval of this grant by the County.
3. The Permittee shall defend, indemnify, and hold harmless the County, its agents, officers, and employees from any claim, action, or proceeding against the County or its agents, officers, or employees to attack, set aside, void, or annul this permit approval, which action is brought within the applicable time period of Government Code section 65009 or any other applicable limitations period. The County shall promptly notify the Permittee of any claim, action, or proceeding and the County shall reasonably cooperate in the defense. If the County fails to promptly notify the Permittee of any claim, action, or proceeding, or if the County fails to cooperate reasonably in the defense, the Permittee shall not thereafter be responsible to defend, indemnify, or hold harmless the County.
4. In the event that any claim, action, or proceeding as described above is filed against the County, the Permittee shall within ten days of the filing make an initial deposit with LA County Planning in the amount of up to \$5,000.00, from which actual costs and expenses shall be billed and deducted for the purpose of defraying the costs or expenses involved in LA County Planning’s cooperation in the defense, including but

not limited to, depositions, testimony, and other assistance provided to Permittee or Permittee's counsel.

If during the litigation process, actual costs or expenses incurred reach 80 percent of the amount on deposit, the Permittee shall deposit additional funds sufficient to bring the balance up to the amount of \$5,000.00. There is no limit to the number of supplemental deposits that may be required prior to completion of the litigation.

At the sole discretion of the Permittee, the amount of an initial or any supplemental deposit may exceed the minimum amounts defined herein. Additionally, the cost for collection and duplication of records and other related documents shall be paid by the Permittee according to County Code Section 2.170.010.

5. If any material provision of this grant is held or declared to be invalid by a court of competent jurisdiction, the permit shall be void and the privileges granted hereunder shall lapse.
6. Prior to the use of this grant, the Permittee, or the owner of the subject property if other than the Permittee, shall **record the terms and conditions** of the grant in the office of the County Registrar-Recorder/County Clerk (i.e. Recorder's Office). In addition, upon any transfer or lease of the property during the term of this grant, the Permittee, or the owner of the subject property if other than the Permittee, shall promptly provide a copy of the grant and its conditions to the transferee or lessee of the subject property.
7. **This grant shall terminate on September 11, 2044.** Entitlement to use of the property thereafter shall be subject to the regulations then in effect. If the Permittee intends to continue operations after such date, regardless of whether the Permittee proposes any modifications to the use at that time, the Permittee shall file a new CUP and Variance application with LA County Planning or shall otherwise comply with the applicable requirements at that time. Such application shall be filed at least twelve (12) months prior to the expiration date of this grant and shall be accompanied by the required fee. In the event that the Permittee seeks to discontinue or otherwise change the use, notice is hereby given that the use of such property may require additional or different permits and would be subject to the then-applicable regulations.
8. This grant shall expire unless used within ninety (90) days from the date of final approval of the grant (by December 26, 2024). A single thirty (30) day time extension may be requested in writing and with the payment of the applicable fee prior to such expiration date. For the purposes of this provision, the continued operation of the amusement ride (bungee jumping) and/or private heliport on the site and satisfaction of Condition No. 2 shall be considered use of this grant.
9. The subject property shall be maintained and operated in full compliance with the conditions of this grant and any law, statute, ordinance, or other regulation applicable to any development or activity on the subject property. Failure of the Permittee to

cease any development or activity not in full compliance shall be a violation of these conditions. No provision of any easement of any other encumbrance on the property shall exempt the Permittee and/or property owner from compliance with these conditions and applicable regulations.

Inspections shall be made to ensure compliance with the conditions of this grant as well as to ensure that any development undertaken on the subject property is in accordance with the approved site plan on file. Given the remote location of the Project Site, at the request of LA County Planning, the Permittee shall provide transportation to and from the Project Site to assist with the completion of these inspections.

The Permittee shall deposit with the County the sum **\$2,205.00**, which shall be placed in a performance fund and be used exclusively to reimburse LA County Planning for all expenses incurred while inspecting the premises to determine the Permittee's compliance with the conditions of this grant. The fund provides for **five (5)** inspections. Inspections may be unannounced. Inspections may be conducted utilizing any available technologies, including, but not limited to, unmanned aircraft systems (UAS). Use of an UAS requires the approval of the Permittee pursuant to LA County Planning's UAS Policy, which may be updated from time to time, and which shall be provided to the Permittee upon request.

If additional inspections are required to ensure compliance with the conditions of this grant, or if any inspection discloses that the subject property is being used in violation of any one of the conditions of this grant, the Permittee shall be financially responsible and shall reimburse LA County Planning for all additional enforcement efforts necessary to bring the subject property into compliance. The amount charged for additional inspections shall be \$441.00 per inspection, or the current recovery cost established by LA County Planning at the time any additional inspections are required, whichever is greater.

10. Notice is hereby given that any person violating a provision of this grant is guilty of a misdemeanor. Notice is further given that the Regional Planning Commission ("Commission") or a Hearing Officer may, after conducting a public hearing, revoke or modify this grant, if the Commission or Hearing Officer finds that these conditions have been violated or that this grant has been exercised so as to be detrimental to the public's health or safety or so as to be a nuisance, or as otherwise authorized pursuant to County Code Chapter 22.238.
11. All development pursuant to this grant must be kept in full compliance with the County Fire Code to the satisfaction of the County Fire Department.
12. All development pursuant to this grant shall conform with the requirements of the County Department of Public Works to the satisfaction of said department.
13. All development pursuant to this grant shall comply with the requirements of Title 22 of the County Code and of the specific zoning of the subject property, unless

specifically modified by this grant, as set forth in these conditions, including the approved Exhibit "A," or a revised Exhibit "A" approved by the Director of Regional Planning ("Director").

14. The Permittee shall maintain the subject property in a neat and orderly fashion. The Permittee shall maintain free of litter all areas of the premises over which the Permittee has control.
15. All structures, walls and fences shall remain free of graffiti or other extraneous markings, drawings, or signage that was not approved by LA County Planning. These shall include any of the above that do not directly relate to the business being operated on the premises or that do not provide pertinent information about said premises. The only exceptions shall be seasonal decorations or signage provided under the auspices of a civic or non-profit organization.

In the event of graffiti or other extraneous markings occurring, the Permittee shall remove or cover said markings, drawings, or signage within 48 hours of such notification, weather permitting. Paint utilized in covering such markings shall be of a color that matches, as closely as possible, the color of the adjacent surfaces.

16. The subject property shall be developed and maintained in substantial conformance with the plans marked Exhibit "A", including the location of the existing heliport all other existing and proposed structures, including but not limited to trails, roads, camping areas, signs, fences, storage containers, canopies, and other features. If changes to any of the plans marked Exhibit "A" are required as a result of instruction given at the public hearing, **one (1) digital copy** of a modified Exhibit "A" shall be submitted to LA County Planning by **November 12, 2024**.
17. In the event that subsequent revisions to the approved Exhibit "A" are submitted, the Permittee shall submit **one (1) digital copy** of the proposed plans to the Director for review and approval. All revised plans must substantially conform to the originally approved Exhibit "A." All revised plans must be accompanied by the written authorization of the property owner(s) and applicable fee for such revision.

#### **PROJECT-SPECIFIC CONDITIONS**

18. This grant shall authorize an amusement ride (bungee jumping), a private heliport, and overnight camping with appurtenant facilities (a container used as a hangar to store a helicopter, two storage containers, a storage building, an office, a security booth, a restroom building with composting toilets, a removable shade canopy, a directional/informational sign, and fencing) on the Project Site without any required on-site parking.
19. No dedicated parking is required for the project.
20. The Permittee shall encourage guests to carpool or rideshare to the trailhead to minimize the number of cars parked in the vicinity of the trailhead of the East Fork

Trail. The Permittee's website and any other promotional materials related to the Project shall include a statement that encourages guests to carpool or rideshare to the trailhead of the East Fork Trail.

21. The total number of guests shall not exceed the following limits: 144 guests on one tour; 177 guests in one day, including overnight guests; 1,186 guests in one month; and 8,437 guests in one calendar year. The Permittee shall maintain logs of the number of guests and the number of bungee jumps for each tour and shall provide them to LA County Planning upon request. The logs shall be maintained in a digital format that can be emailed to LA County Planning.
22. The maximum number camping nights allowed at the Project Site in one calendar year is 13. The maximum number of guests participating in camping nights at the Project Site in one calendar year is 169. The maximum number of guests participating in any single camping night at the Project Site is 22. The Permittee shall maintain logs of all camping nights, including the date of each camping night and the number of guests on each camping night, and shall provide them to LA County Planning upon request. The logs shall be maintained in a digital format that can be emailed to LA County Planning.
23. The Permittee shall comply with all requirements provided in the attached letter issued by the Department of Public Health ("Public Health") dated August 22, 2024.
24. The Permittee shall comply with all conditions provided in the attached letter issued by the County Fire Department ("Fire Department") dated January 8, 2024.
25. The Permittee shall comply with all applicable regulations of the California Department of Transportation Division of Aeronautics and the Federal Aviation Administration ("FAA") for the private heliport, including the condition in the attached FAA memorandum dated April 15, 2020. The heliport shall only function as an accessory use to the amusement ride (bungee jumping) and not as a separate or independent use. The private heliport shall be removed if the amusement ride (bungee jumping) use is discontinued.

**PROJECT-SPECIFIC CONDITIONS: COMPOSTING TOILET SYSTEM**

26. The Permittee shall comply with all requirements related to the composting toilet system required by Condition 28, below, that are provided in the attached letter issued by Public Health dated August 22, 2024, as well as Conditions 27 through 33, below.
27. Within three (3) months of the date of final approval, the Permittee shall select a certified industrial hygienist to assist with the activities required by Conditions 29 through 33, below, and provide information regarding their qualifications, expertise, and experience to the satisfaction of the Director. The Permittee may request a single three (3) month time extension in writing before the initial three (3) month period ends, which the Director may grant. After the Permittee provides the required

information to the satisfaction of the Director, the Director may approve the certified industrial hygienist based on an evaluation of their qualifications, expertise, and experience, and may consult with Public Health, if needed, before making a decision. If the Director does not approve the certified industrial hygienist, the Permittee shall select a different certified industrial hygienist and provide the information required above, and the Director shall conduct the same evaluation described above. If the Director does not approve the other certified industrial hygienist, the process described above shall be repeated until such time that the Director approves a certified industrial hygienist. The process described above shall also be repeated if the Permittee decides to select a different certified industrial hygienist than the one approved by the Director at any time during the grant term. Throughout the grant term, the Permittee shall be responsible for paying all expenses that are incurred by the certified industrial hygienist(s) approved by the Director when they assist with the activities required by Conditions 29 through 33, below.

28. Within six (6) months of the date of final approval, the Permittee shall install a composting toilet system. The Permittee may request a single six (6) month time extension in writing before the initial six (6) month period ends, which the Director may grant.
29. When the composting toilet system is installed, the certified industrial hygienist approved by the Director shall inspect and approve the installation. The certified industrial hygienist shall also determine that it is appropriately sized to meet anticipated demand and otherwise meets the specifications for proper functioning. The certified industrial hygienist shall submit a written report indicating this approval to the Director for future reference.
30. Six (6) months after the composting toilet system is installed, the certified industrial hygienist approved by the Director shall inspect the facility and submit a written report to the Director regarding the facility and whether it continues to meet the specifications for proper functioning.
31. After the inspection required by Condition 30, above, the certified industrial hygienist approved by the Director shall inspect the composting toilet system and submit a written report to the Director regarding the facility and whether it continues to meet the specifications for proper functioning at one year intervals (i.e., eighteen (18) months after the composting toilet system is installed, thirty (30) months after the composting toilet system is installed, etc.).
32. In addition to the inspections required by Condition 31, above, the Director may, at any other time, require the certified industrial hygienist approved by the Director to inspect the composting toilet system and submit a written report to the Director regarding the facility and whether it continues to meet the specifications for proper functioning.
33. If the Director, after reviewing any of the reports required by Conditions 30 through 32, above, and after consulting with Public Health, if needed, determines that the

composting toilet no longer meets the specifications for proper functioning, the Director shall require the Permittee to cease operations until such time that necessary repairs or modifications are made, inspected, and approved by the certified industrial hygienist to the satisfaction of the Director, following consultation with Public Health, if needed. If the Permittee does not comply with this condition, pursuant to Condition 10, above, the Director shall initiate a public hearing before the Commission to consider modification or revocation of this grant pursuant to County Code Chapter 22.238. The Commission may, after conducting the public hearing, revoke or modify this grant if the Commission finds that these conditions have been violated or that this grant has been exercised so as to be detrimental to the public's health or safety or so as to be a nuisance, or as otherwise authorized pursuant to County Code Chapter 22.238.

Attachments:

1. Public Health Letter dated March 2, 2023
2. Fire Department Letter dated January 8, 2024
3. FAA Memorandum dated April 15, 2020

## CONDITIONAL USE PERMIT (CUP) – BURDEN OF PROOF

For over 34-years, the proprietor of Bungee America (Ron Jones) has managed four contiguous parcels of property located on a private inholding within the Sheep Mountain Wilderness Area, Angeles National Forest, San Gabriel Mountains National Monument that includes the “Bridge to Nowhere” property where Bungee America has successfully operated a state-licensed bungee jumping business for over thirty-four years (“Property”), with a sterling safety record.

Bungee America has, for its many years of operation, meaningfully contributed to the general public’s use and enjoyment of the surrounding National Forest by allowing public access to the Property for hiking and recreational purposes. The Bridge to Nowhere, on Bungee America’s private property, is a tremendously popular hiking destination, providing spectacular views and recreational experiences. Hundreds of midweek hikers and thousands of weekend hikers travel across the Property every year to hike to the bridge.

Bungee America seeks a CUP from the County of Los Angeles (“County”) for the following uses: (1) Amusement Ride – Bungee Jumping; (2) Private Heliport; and (3) one- 10 ft; two –16 ft; one – 20ft; and three - 40ft Storage containers (“CUP Uses”).<sup>1</sup> Additional accessory uses include a security booth with signage; bathroom; roof-top mounted solar panels; and security fencing. Bungee America also plans to continue using the Property for overnight camping, hiking, and accessory buildings. These uses are allowed on the Property without a CUP due to the C-R zoning.<sup>2</sup> Bungee America seeks a variance from parking for all the above uses on the Property. The variance burden of proof has been filled out on a separate form included with the CUP application.

The County of Los Angeles shall grant the CUP if Bungee America can fulfill the burdens of proof for each of the three CUP Uses. Bungee America can prove that the requested uses for the Property will not:

### **I. Criteria A:**

- A. Adversely affect the health, peace, comfort or welfare of persons residing or working in the surrounding area, or**
- B. Be materially detrimental to the use, enjoyment or valuation of property of other persons located in the vicinity of the site, or**
- C. Jeopardize, endanger or otherwise constitute a menace to the public health, safety or general welfare.**

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<sup>1</sup> Bungee America/s Property is zoned C-R. These uses are allowed in the C-R zone with a CUP. Los Angeles County Ordinance (“Ordinance”) § 22.28.320 - Uses Subject to a CUP.

<sup>2</sup> These uses are allowed in the C-R zone without a CUP. Ordinance §§ 22.28.290(2), 22.28.300.

## 1. Amusement Ride – Bungee Jumping

- A. Bungee Jumping do not adversely affect the health, peace, comfort or welfare of persons residing or working in the surrounding area.

Bungee America's use of the Property for Bungee Jumping will not adversely affect the health, peace, comfort or welfare of persons residing or working in the surrounding area because the Property is so remote; there is no residential or commercial use within a 6-mile radius of the property. Since no person is residing or working within 100 square miles, Bungee America's use of the Property for bungee jumping will not and cannot adversely affect the health, peace, comfort or welfare of persons residing or working in the surrounding area because there is no one residing or working in the surrounding area. The Property is only accessible by the public via a five-mile hike over a public hiking trail.

- B. Bungee Jumping does not and would not be materially detrimental to the use, enjoyment or valuation of property of other persons located in the vicinity of the site.

Because the Bungee America property is so remote, there is no "property of other persons" within a six miles radius of the subject property, Since there is no private property within more than 100 square miles, the proposed uses will not impact other people or property in the vicinity because there is no "property of other persons located in the vicinity of the site. The surrounding property is United States Forest land that is open and accessible to members of the public that hike through the forest. Therefore, the bungee jumping activities is not materially detrimental to the use, enjoyment, or valuation of property of others person located in the vicinity of the site.

- C. The long-existing bungee jumping use does not jeopardize, endanger or otherwise constitute a menace to the public health, safety or general welfare.

The State of California Amusement Ride Division regulates the safety of Bungee Jumping, including annual inspections. Bungee America has had no safety incidents in its over thirty- four years of operations at the Bridge to Nowhere. Furthermore, Bungee America provides outstanding benefits to the public health, safety, and welfare. The majority of hikers crossing the Property are members of the general public unaffiliated with Bungee America and are provided emergency first aid and emergency satellite phone assistance, if needed. Even hiker's dogs, who routinely injure their paws on the public trail's sharp rocks, are provided aid. Due to the remoteness of the location, there is no cellular phone service available for hours in any direction with the exception of Bungee America's emergency satellite phone, which has been routinely used for members of the public in emergency situations. Bungee America's emergency communication

equipment now includes “Starlink” WI-FI, which adds another layer of emergency satellite connectivity to further benefit the hiking public. Having such a satellite phone at this popular hiking destination is a huge benefit to the public.

Bungee America has a vested interest in keeping the entire five-mile public hiking trail in a trash free condition. In addition to Bungee America staff regularly picking up trash along the five-mile public trail through the forest, they also sponsor several annual trail clean up events. Furthermore, for more than a decade Bungee America has a standing invitation to any groups who pick up trash north of the Bridge to Nowhere, to deliver this trash to Bungee America who will arrange for the trash to be taken out of and disposed of properly.

## **2. Private Heliport**

- A. The helicopter and heliport do not adversely affect the health, peace, comfort or welfare of persons residing or working in the surrounding area.

The subject property is so remote there is no residential or commercial use within a six-mile radius. Because the Property is so remote there is no residential or commercial use within a 6-mile radius of the property. Since no person can be residing or working within 100 square miles, Bungee America’s use of the Heliport will not and cannot adversely affect the health, peace, comfort or welfare of persons residing or working in the surrounding area because there is no one residing or working in the surrounding area. The subject property is only accessible by the public via a five-mile hike over a public hiking trail. Therefore, the helicopter and heliport cannot adversely affect the health, peace, comfort or welfare of persons residing or working in the surrounding area.

- B. The helicopter and heliport are not materially detrimental to the use, enjoyment or valuation of property of other persons located in the vicinity of the site.

Noise from the helicopter is minimal, due to its small sound signature and its relative infrequent use at the Property. The helicopter is typically stored off-site and occasionally stored in the 40-foot container, along with a four-wheeled all-terrain vehicle and tow cart. The helicopter is used infrequently throughout the year and care is used to fly in a manner that does not materially impact the use or enjoyment or valuation of property or persons in the vicinity of the site. Due to the remoteness and 50-acre size of the Property, the only people who may be in the vicinity of the heliport are Bungee America guests or members of the public hiking through the Property. Members of the public may see it only because the Applicant allows public access to the Property. Aside from the aforementioned, The Bungee America property is so remote, there is no “property of other persons” within a six miles radius of the subject property, Since there is no private property within more than 100 square miles, the proposed uses will not impact other people or property in the vicinity because there is no “property of

other persons located in the vicinity of the site". The surrounding property is United States Forest land that is open and accessible to members of the public that hike through the forest.

Therefore, the heliport is not materially detrimental to the use, enjoyment or valuation of property of other persons located in the vicinity of the site.

- C. The helicopter and heliport use do not jeopardize, endanger or otherwise constitute a menace to the public health, safety or general welfare.

The only means of access to the site is by a 10-mile roundtrip hike, or by helicopter. The remoteness of the Property, and its lack of vehicular access, necessitates that all equipment and supplies be carried in and out by staff on their back, or flown into the property by helicopter. Because this is a 10-mile roundtrip hike taking over four hours, it is not feasible for staff to transport thousands of pounds of equipment and supplies on their backs. Therefore, use of a helicopter is essential to deliver supplies to the Property; it is a logistics support vehicle and is not used to transport patrons.

The helicopter is an important factor in Bungee America's environmental stewardship of the area. In addition to transporting equipment and supplies, it is used to remove waste and trash from the Property, including public littering that is collected and disposed of by Bungee America staff. Bungee America employees and customers use a private outhouse on the Property, and all the waste has been sanitarily removed from the canyon for the many years of the business' operations at the Property. The current outhouse will be replaced with up to four composting toilets inside a single 20-foot container. Solid human waste will be composted on site and liquid waste will be flown off by helicopter. This will efficiently and sustainably provide more environmentally sensitive disposal of human waste; further reduce waste; and, increase the general welfare. The helicopter and heliport support the public's health, safety and general welfare.

### **3. Storage Containers**

- A. The storage containers do not adversely affect the health, peace, comfort or welfare of persons residing or working in the surrounding area.

The subject property is so remote there is no residential or commercial use within a six-mile radius. Because the Property is surrounded by forest service land, there is no one residing or working in the surrounding area near the Property. Since no person can be residing or working within 100 square miles, Bungee America's use of the storage containers will not and cannot adversely affect the health, peace, comfort or welfare of persons residing or working in the surrounding area because there is no one residing or working in the surrounding area. The subject property is only accessible by the public via a five-mile hike over a public hiking trail. Therefore, the storage containers cannot adversely

affect the health, peace, comfort or welfare of persons residing or working in the surrounding area.

- B. The storage containers are not materially detrimental to the use, enjoyment or valuation of property of other persons located in the vicinity of the site.

Due to the remote location of the Property, most people never see or know that the storage containers are on the Property. Therefore, the storage containers are not materially detrimental to the use, enjoyment or valuation of property of other persons located in the vicinity of the site. Due to the remoteness and 50-acre size of the Property, the only people who may be in the vicinity of the storage containers are Bungee America guests or members of the public hiking through the Property. Members of the public may see them only because the Applicant allows public access to the Property. Aside from the aforementioned, The Bungee America property is so remote, there is no “property of other persons” within a six miles radius of the subject property and there is no private property within more than 100 square miles, the proposed storage containers will not impact other people or property in the vicinity because there is no “property of other persons located in the vicinity of the site”. The surrounding property is United States Forest land that is open and accessible to members of the public that hike through the forest. Therefore, the storage containers are not materially detrimental to the use, enjoyment or valuation “of property of other persons” located in the vicinity of the site.

- C. The storage containers use does not jeopardize, endanger or otherwise constitute a menace to the public health, safety or general welfare.

The storage containers contribute to the public health and safety by securing the bungee jumping equipment from tampering by the thousands of public visitors who cross the Property on their recreational hikes. California amusement ride regulations require that operators securely store all equipment related to the safe operation of their rides. Use of containers is environmentally superior to developing new buildings on the Property to provide storage because the storage containers’ footprint is limited; they are recycled from previous use as a shipping container; and are highly fire resistant. Furthermore, the addition of roofs with solar panels on the containers will provide renewable solar energy and increase public health, safety and welfare by keeping the content of the containers cooler environment including heat sensitive bungee equipment, computer-controlled amusement ride systems and emergency communication hardware. While providing renewable solar energy rather than solely using a generator.

## **II. Criteria B**

**That the proposed site is adequate in size and shape to accommodate the yards, walls, fences, parking and loading facilities, landscaping and**

**other development features prescribed in this Title 22, or as is otherwise required in order to integrate said use with the uses in the surrounding area.**

The Property is adequate in size and shape to accommodate all physical structures needed for the CUP Uses and carefully planned for those CUP Uses to integrate seamlessly into the surrounding environment. The Property is remote, open, and isolated. The Property is over 50 acres and the area where the CUP Uses are is large and will not be hindered by physical obstacles. The Commercial Recreational (C-R) zone provides for a comprehensive range of entertainment and amusement activities of a commercial nature. (Zoning Ordinance § 22.28.280.) Sites in Zone C-R may be used for campgrounds and hiking trails, as well as accessory buildings and structures customarily used in conjunction therewith. (*Id.* §§ 22.28.290, 22.28.300.) Bungee Jumping falls within the range of entertainment and amusement activities allowed in the C-R zone, with a CUP. (*Id.* § 22.28.320.)

### **III. Criteria C**

**That the proposed site is adequately served:**

- 1. By highways or streets of sufficient width, and improved as necessary to carry the kind and quantity of pedestrian, bicycle, and vehicle traffic such use would generate; and**
- 2. By other public or private service facilities as are required.**

As noted, the Property is a private inholding surrounded by the Angeles National Forest with no vehicular access to the property. Bungee America's customers use a public hiking trail that is open to the general public as a means of access to the Property. The closest road is Camp Bonita Road, approximately five miles from the Property boundary. Camp Bonita Road is a County of Los Angeles maintained road and is of sufficient width, and improved as necessary to carry the kind and quantity of pedestrian and vehicle traffic Bungee America generates. The US Forest Service's public trail which Bungee America's customers hike over can easily accommodate them as it also supports over 20,000 public hikers a year who visit the Bridge to Nowhere. Bungee America has been operating for over 34-years without incidents related to Camp Bonita Road or the Forest Service hiking trail.

**VARIANCE FINDINGS – BURDEN OF PROOF**  
Bungee America CUP/ RFS No: 14-0002827/EF140610

Bungee America owns four contiguous parcels of property in the Sheep Mountain Wilderness Area, Angeles National Forest, San Gabriel Mountains National Monument that includes the “Bridge to Nowhere” property where Bungee America has successfully operated a state-licensed bungee jumping business for over thirty-four years (“Property”), with a sterling safety record.

Bungee America contributes to the use, enjoyment, and valuation of the surrounding National Forest by allowing public access to the Property for hiking and recreation purposes. The Bridge to Nowhere, on Bungee America’s private property, is a tremendously popular hiking destination. Hundreds of midweek hikers and thousands of weekend hikers travel across the Property every year to hike to the bridge.

Bungee America seeks a CUP from the County of Los Angeles (“County”) for the following uses: (1) Amusement Ride – Bungee Jumping; (2) Private Heliport; and (3) one- 10 ft; two –16 ft; one – 20ft; and three - 40ft Storage containers (“CUP Uses”).<sup>1</sup> Additional accessory uses include a security booth with signage; bathroom; roof-top mounted solar panels; and security fencing. Bungee America also plans to continue using the Property for overnight camping, hiking, and accessory buildings. These uses are allowed on the Property without a CUP due to the C-R zoning.<sup>2</sup> Bungee America seeks a variance from parking for all the above uses on the Property. The variance burden of proof has been filled out on a separate form included with the CUP application.

The County of Los Angeles shall grant the variance if Bungee America can fulfill the burdens of proof. Pursuant to Section 22.194.050 (Findings and Conditions), Bungee America shall substantiate the following:

**B1. Because of special circumstances or exceptional characteristics applicable to the property, the strict application of the County Code deprives such property of privileges enjoyed by other property in the vicinity and under identical zoning classification.**

Bungee America’s situation is exceptionally unique. It is the only private inholding of its size and location in the Angeles National Forest. The remote location of the Property creates the special circumstance for which this variance is necessary: there is no way to access the Property by car. The only access is by a five-mile hike over public land. The surrounding land is part of the public domain and is

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<sup>1</sup> Bungee America/s Property is zoned C-R. These uses are allowed in the C-R zone with a CUP. Los Angeles County Ordinance (“Ordinance”) § 22.28.320 - Uses Subject to a CUP.

<sup>2</sup> These uses are allowed in the C-R zone without a CUP. Ordinance §§ 22.28.290(2), 22.28.300.

managed by the United States Forest Service. Bungee America's guests have been utilizing parking spaces along Camp Bonita Road for over 34-years. As a private landowner and commercial operator, at numerous times throughout Bungee America's existence, Bungee America was provided U.S. Forest Service administrative parking passes for Bungee America employees. For many years Bungee America has also been a vendor for the Forest Service, selling Adventures Passes that allowed their guests, and the public, the ability to pay for their parking at the trailhead and along Camp Bonita Road. Members of the public using the public hiking trail to access Forest Service lands and the Bridge to Nowhere are allowed to park on Camp Bonita Road. Bungee America should not be held to a parking standard they cannot fulfill.

**B2. The modification authorized will not constitute a grant of special privilege inconsistent with the limitations upon other properties in the vicinity and zone in which the property is situated.**

Bungee America's situation is wholly unique because there are no other large inholding property owners in the vicinity. There is no other commercial recreation business in the vicinity whose sole access is from Camp Bonita Road. Bungee America has the right to access its Property from the closest public road, Camp Bonita Road. Under federal law, with regard to inholdings, such access rights do not distinguish between the property owner, and the property owner's economic pursuits. The Alaska National Interest Lands Conservation Act ("ANILCA") section 1110(b) provides that owners of private inholdings have the right to access their property for economic and other interests. Furthermore, Bungee America and its patrons access the Property the same way the public accesses the Property, via public hiking trail. Camp Bonita Road has provided Bungee America access rights via the nearest public road, and accommodated Bungee America's parking needs for the last 34-years. For many of those years the Forest Service recognized and sanctioned their parking by providing them parking passes. Therefore, granting the variance will not create a special privilege inconsistent with limitations upon any other properties in the vicinity, and zone for the Property, because the Property is the only one of its kind.

**B3. Strict application of zoning regulations as they apply to such property will result in practical difficulties or unnecessary hardships inconsistent with the general purpose of such regulations and standards.**

Because of the remote location of the Bungee America Property it is impossible to provide, and therefore impractical to require, on-site parking: there is no way to access the Property by car. Requiring off-site parking has also been explored and it creates an insurmountable hardship.

Bungee America analyzed if there were viable parking alternatives in the surrounding area. Bungee America contacted every property owner within five miles and in every direction of the trailhead parking area along Camp Bonita Road and along the entire length of East Fork Road as far west as State Highway 39. The following property owners were contacted:

1. Camp Williams – Private, 24210 East Fork Rd, Azusa, CA 91702
2. Hudson Bay – Private, 23801 East Fork Rd, Azusa, CA 91702
3. Across street from Hudson Bay –Private, East Fork Rd, Azusa, CA 91702
4. River Community – Private, 23701 East Fork Rd, Azusa, CA 91702
5. Follows Camp / City of Industry, 23400 East Fork Rd, Azusa, CA 91702
6. Burro Canyon Shooting Park – Concessionaire, 22100 East Fork Rd, Azusa, CA 91702

Every property owner either had no available space; was not zoned for commercial parking; or were not interested in selling or leasing any potential areas for parking.

The remoteness of the trailhead from the nearest city, Azusa, CA, precludes any public transit. A private shuttle was considered and evaluated however it was determined to be infeasible. The transit time to operate a shuttle service could typically dictate up to a 2 hour wait between shuttling successive groups of guests. For instance, guests in the first shuttle run would be dropped off at the trailhead and then be forced to wait up to two hours before the shuttle arrived with the rest of the guests. Similarly, guests arriving back at the trailhead after a two hour wait in the morning followed by 10 miles of hiking to and from the Bridge to Nowhere could find themselves waiting another two hours for the next shuttle.

Bungee America cannot obtain access to private off-site parking in the vicinity due to the limited number of privately held properties, and limited interest of those property holders. Bungee America requests the variance, so the Property does not have a parking requirement.

**B4. Such adjustment will not be materially detrimental to the public health, safety, or general welfare, or to the use, enjoyment, or valuation of property of other persons located in the vicinity.**

Parking can be accommodated along Camp Bonita Road with no detriment to public health, safety or welfare because there is adequate parking for all. There are sufficient roadside parking spaces. Bungee America's use is only a small fraction of those spaces. In addition, there are additional public parking spaces in the trailhead parking lot. Bungee America's guests are just like other members of the public. Everyone who parks at the trailhead or along Camp Bonita Road is parking there to use the public hiking trail to access the Bridge to Nowhere.

Since Bungee America has been parking at this location for over 34-years without incident, Bungee America firmly believes there is no material detriment to the public or other property or improvements located in the vicinity.

## PROPOSED ENVIRONMENTAL DETERMINATION

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**DETERMINATION DATE:** August 29, 2024  
**PROJECT NUMBER:** 2018-003069  
**PERMIT NUMBER(S):** Conditional Use Permit No. RPPL2018004676  
Variance No. RPPL2018004861

**SUPERVISORIAL DISTRICT:** 5  
**PROJECT LOCATION:** East Fork Trail, Angeles National Forest  
**OWNER:** Saunders Mine LLC  
**APPLICANT:** Bungee America, Inc.  
**CASE PLANNER:** Richard Claghorn, Principal Planner  
rclaghorn@planning.lacounty.gov

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Los Angeles County (“County”) completed an initial review for the above-mentioned Project. Based on examination of the Project proposal and the supporting information included in the application, the County proposes that an Exemption is the appropriate environmental documentation under the California Environmental Quality Act (CEQA). The Project qualifies for Class 1 (Existing Facilities), Class 3 (New Construction or Conversion of Small Structures), Class 5 (Minor Alterations in Land Use Limitations), and Class 23 (Normal Operations of Facilities for Public Gatherings) Categorical Exemptions under State CEQA Guidelines Sections 15301, 15303, 15305, and 15323 and the County Environmental Document Reporting Procedures and Guidelines.

This Project will authorize an existing amusement ride (bungee jumping), a private heliport, and overnight camping with appurtenant facilities (a container used as a hangar to store a helicopter, two storage containers, a storage building, an office, a security booth, a restroom building with composting toilets, a removable shade canopy, a directional/informational sign, and fencing). No changes to the existing facilities are proposed except for a new 160-square-foot restroom building with composting toilets to replace the existing outhouse, a new 80-square-foot security booth, new fencing and a new gate, new signage, and new roofs with solar panels on existing structures. The existing outhouse will be converted into a storage structure. The proposed changes to the facilities are minor in scope and would not create any significant new impacts.

No expansion of the number of visitors is proposed, and the number of visitors will remain within the Project baseline that was based on the applicant’s guest logs for the time period of 2013 to 2015. The Project will not have a significant effect on the environment. No development is proposed in a Significant Ecological Area or any other designated

PROJECT NO. 2018-003069  
CONDITIONAL USE PERMIT NO. RPPL2018004676  
VARIANCE NO. RPPL2018004861

August 29, 2024  
PAGE 2 OF 2

environmental resource area. The Project does not result in cumulative impacts, is not near a scenic highway, is not included on a list of hazardous waste sites, does not impact historic resources, and does not result in other significant effects on the environment. Therefore, no exceptions to the Categorical Exemptions mentioned above are applicable and the Project can be considered exempt..

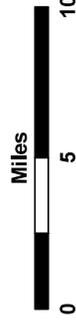
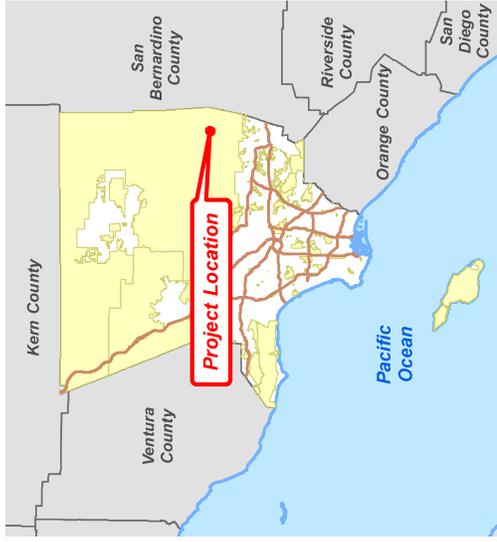
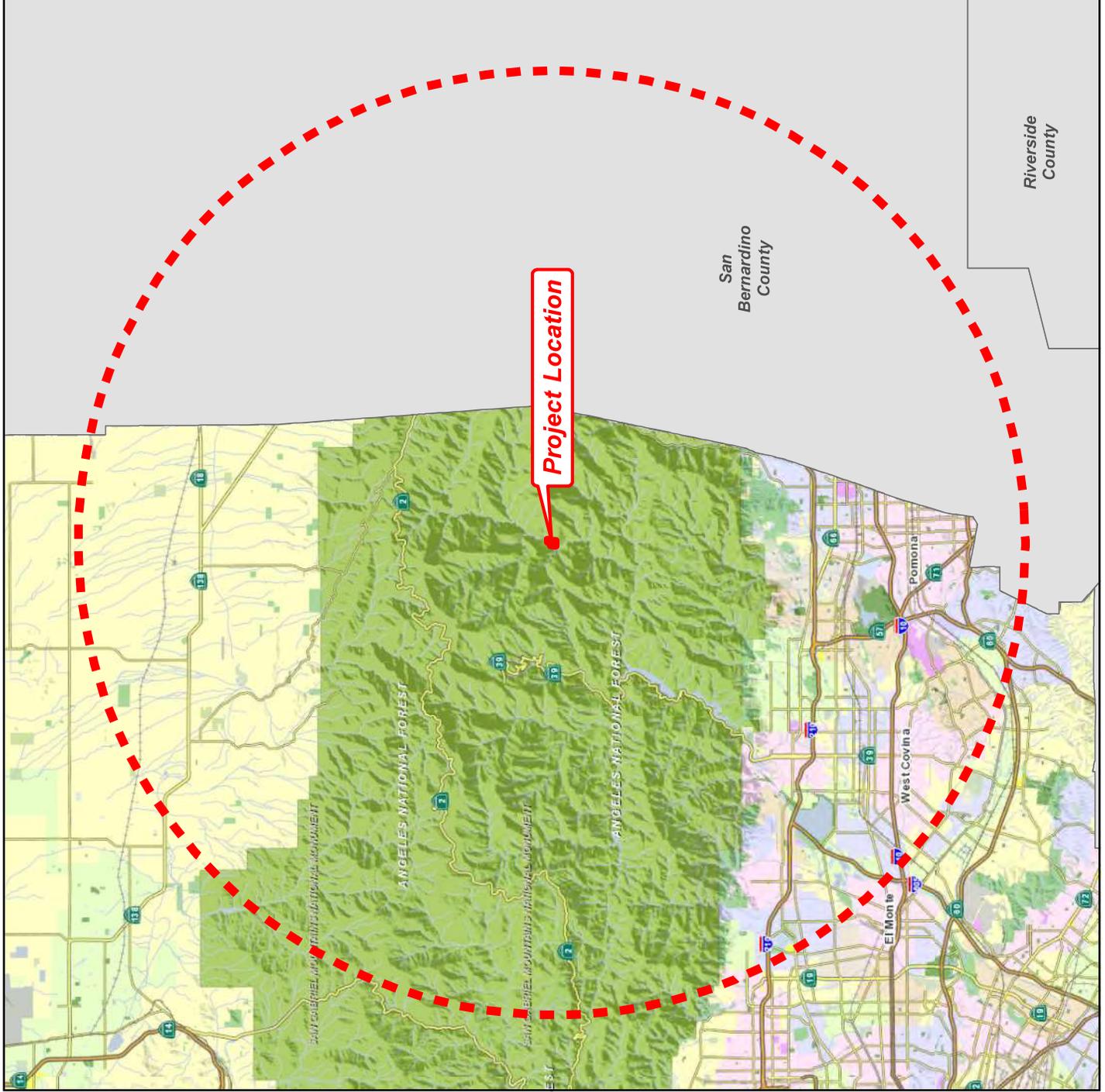
# 20-MILE RADIUS

## LOCATOR MAP

PROJECT NO. 2018-003069

CUP RPPL2018004676

VAR RPPL2018004861



LOS ANGELES COUNTY  
Dept. of Regional Planning  
320 W. Temple Street  
Los Angeles, CA 90012

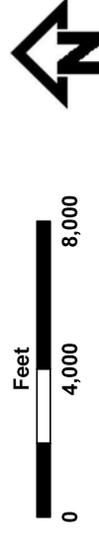
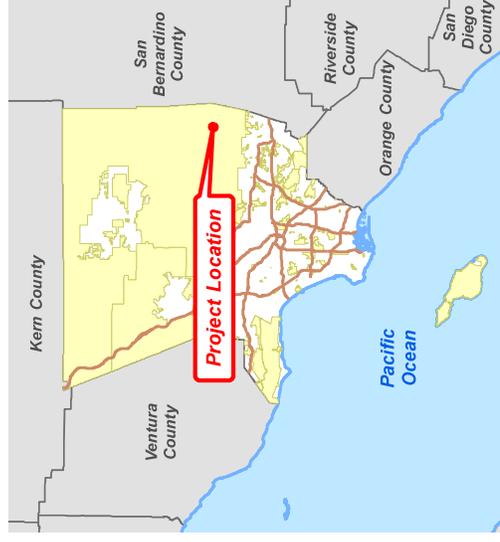
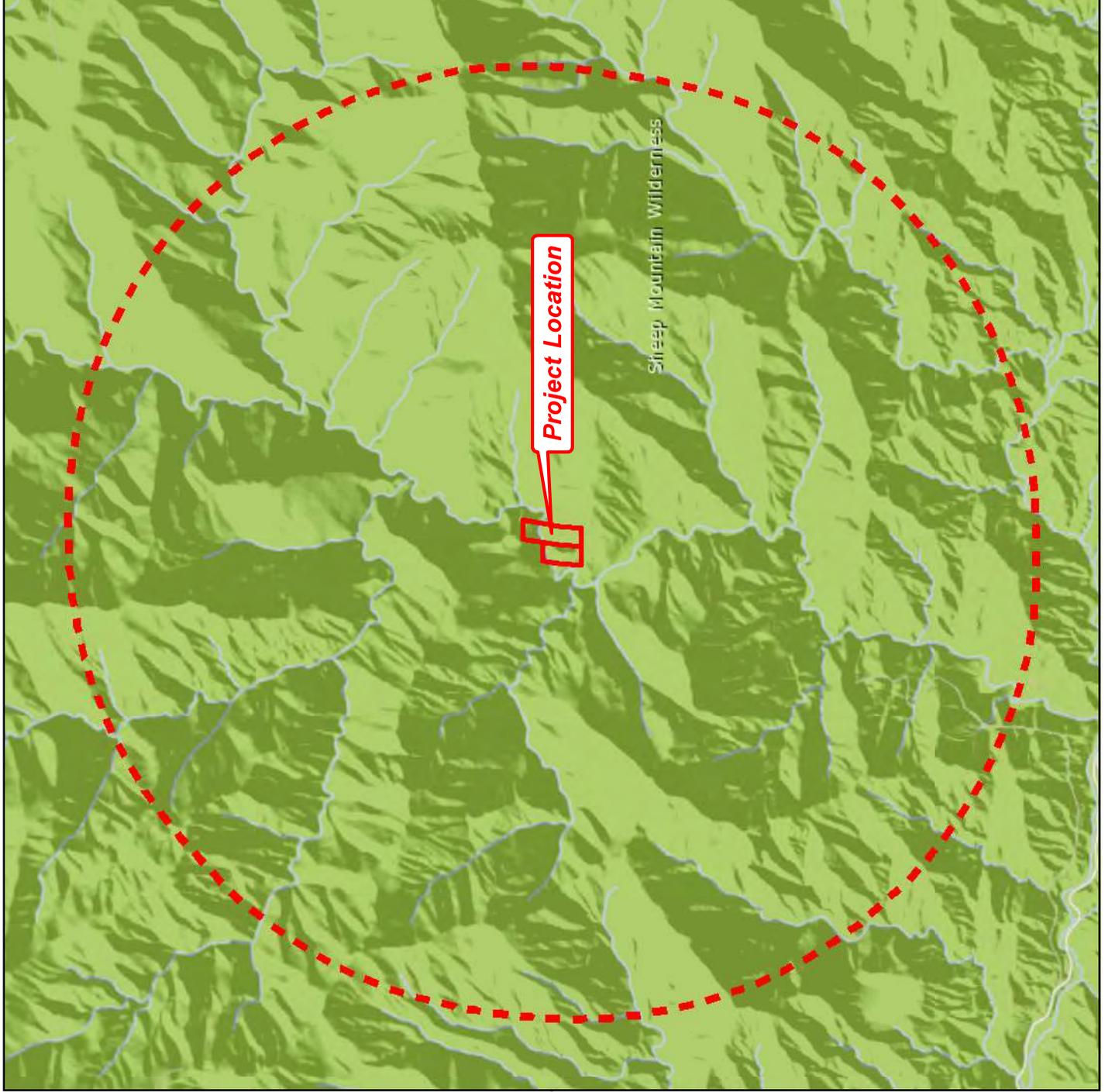
# 3-MILE RADIUS

## LOCATOR MAP

PROJECT NO. 2018-003069

CUP RPPL2018004676

VAR RPPL2018004861



LOS ANGELES COUNTY  
Dept. of Regional Planning  
320 W. Temple Street  
Los Angeles, CA 90012

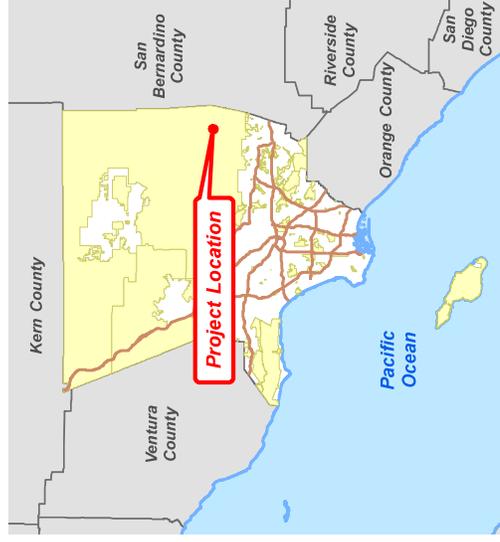
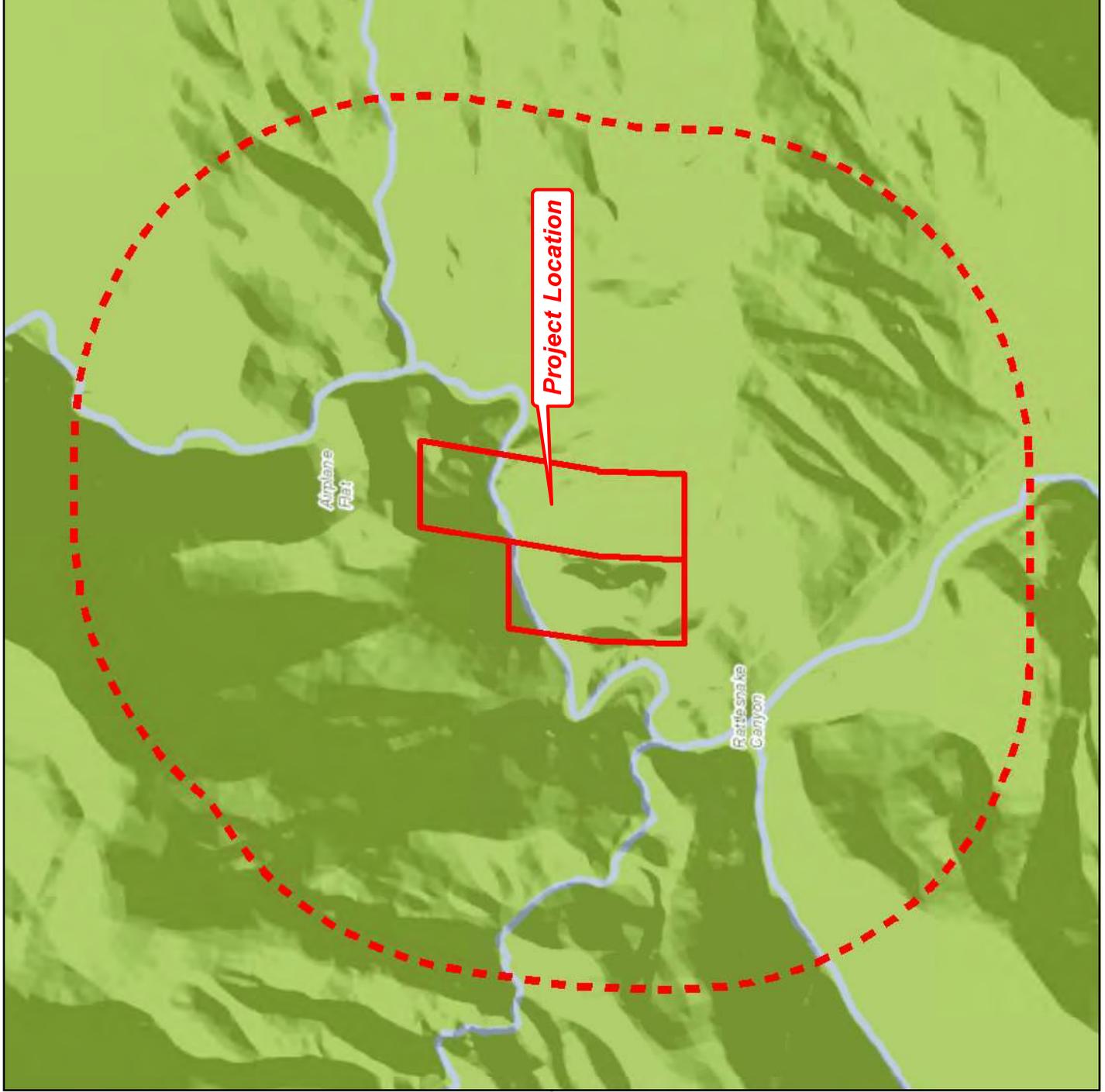
# HALF-MILE RADIUS

## LOCATOR MAP

PROJECT NO. 2018-003069

CUP RPPL2018004676

VAR RPPL2018004861



LOS ANGELES COUNTY  
Dept. of Regional Planning  
320 W. Temple Street  
Los Angeles, CA 90012

# AERIAL IMAGERY

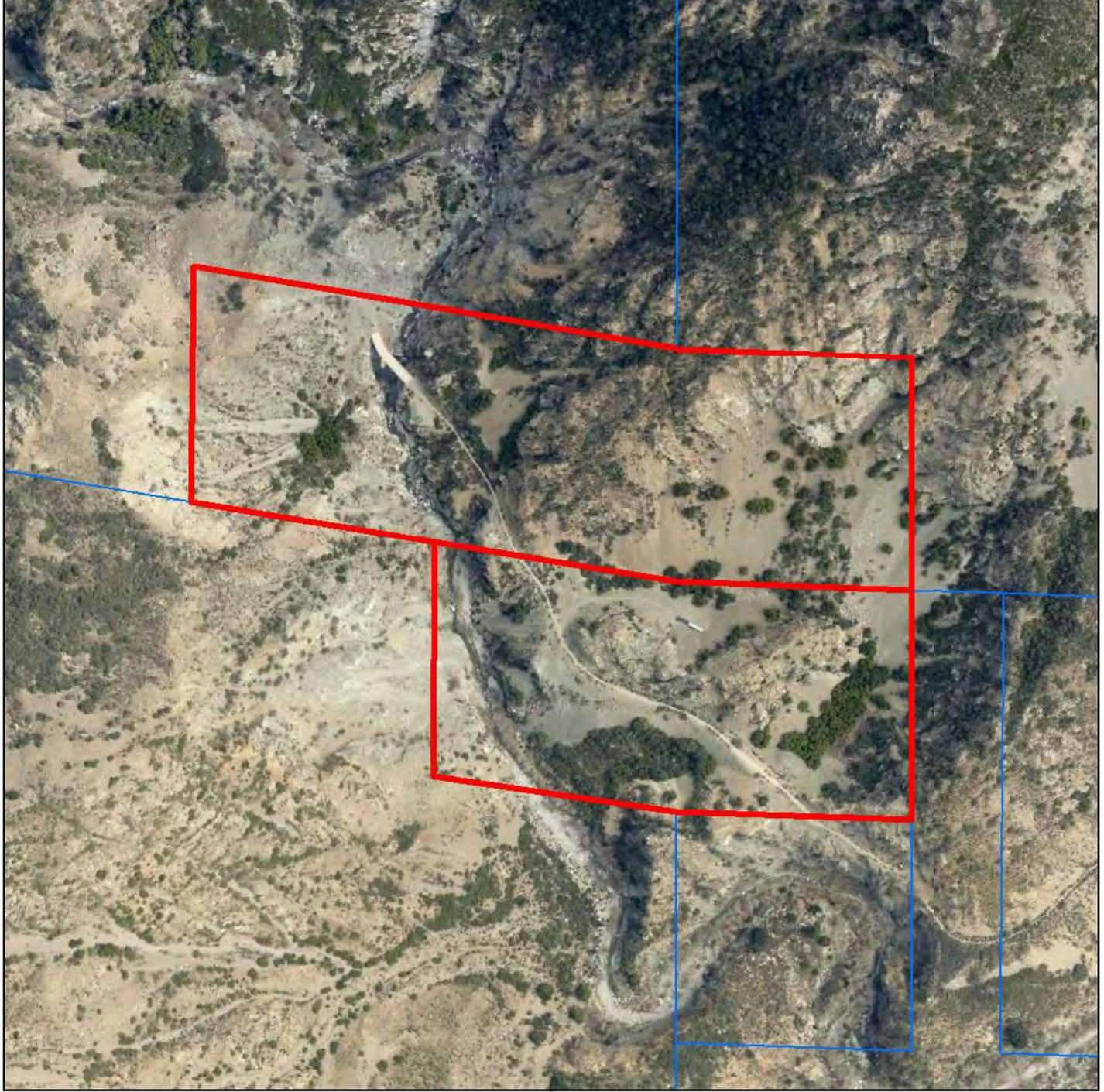
## SITE-SPECIFIC MAP

PROJECT NO. 2018-003069

CUP RPPL2018004676

VAR RPPL2018004861

Digital Ortho Aerial Imagery:  
Los Angeles Region Imagery  
Acquisition Consortium (LARIAC)  
2023



Feet



**L.A. COUNTY**  
**PLANNING**

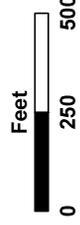
LOS ANGELES COUNTY  
Dept. of Regional Planning  
320 W. Temple Street  
Los Angeles, CA 90012

# LAND USE POLICY 500-FOOT RADIUS MAP

PROJECT NO. 2018-003069  
CUP RPPL2018004676  
VAR RPPL2018004861

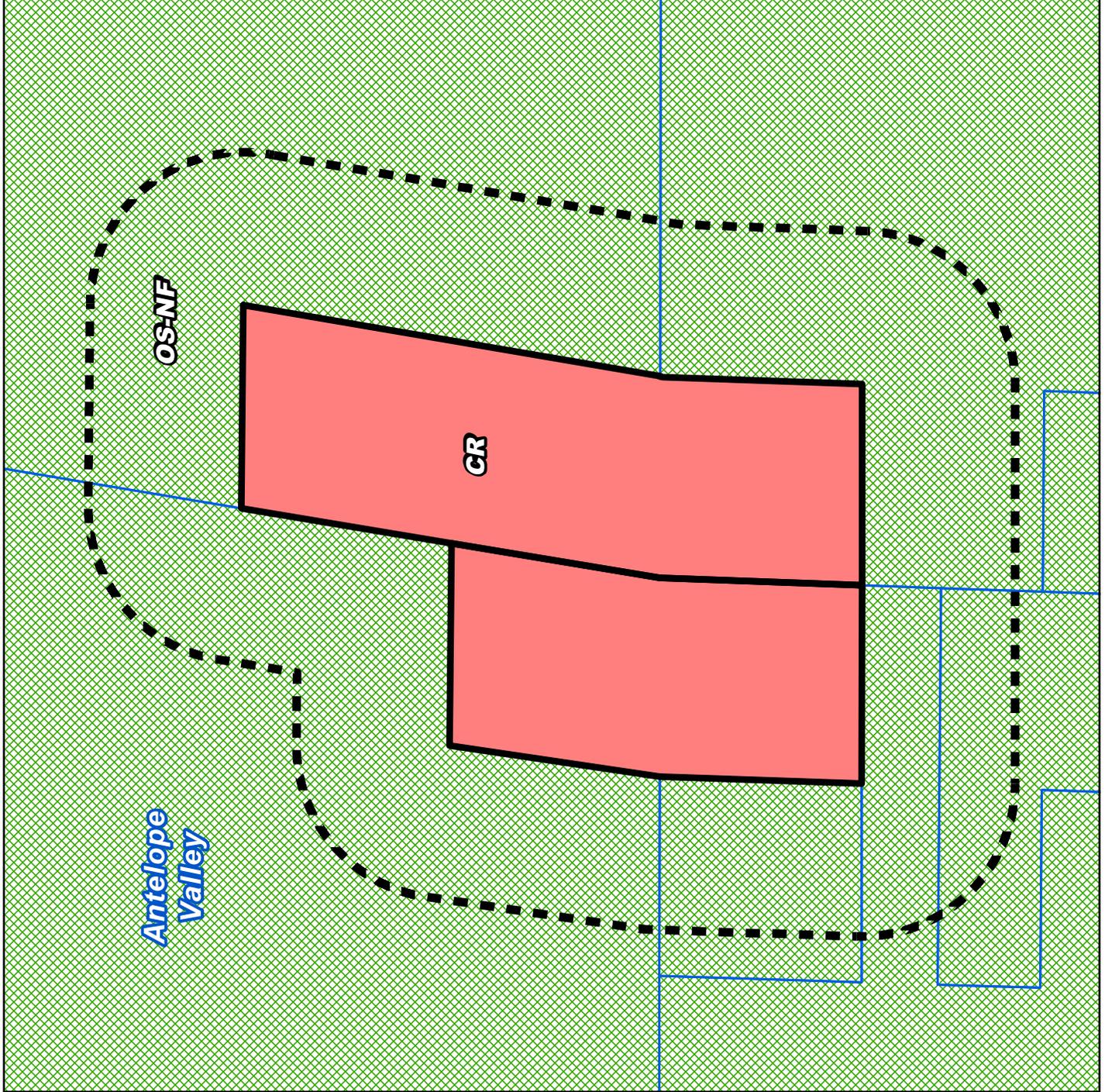
CR - Rural Commercial

OS-NF - Open Space National  
Forest



LA COUNTY  
PLANNING

LOS ANGELES COUNTY  
Dept. of Regional Planning  
320 W. Temple Street  
Los Angeles, CA 90012



# ZONING

## 500-FOOT RADIUS MAP

PROJECT NO. 2018-003069

CUP RPPL2018004676

VAR RPPL2018004861



C-R - Commercial Recreation



W - Watershed



LA COUNTY  
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LOS ANGELES COUNTY  
Dept. of Regional Planning  
320 W. Temple Street  
Los Angeles, CA 90012

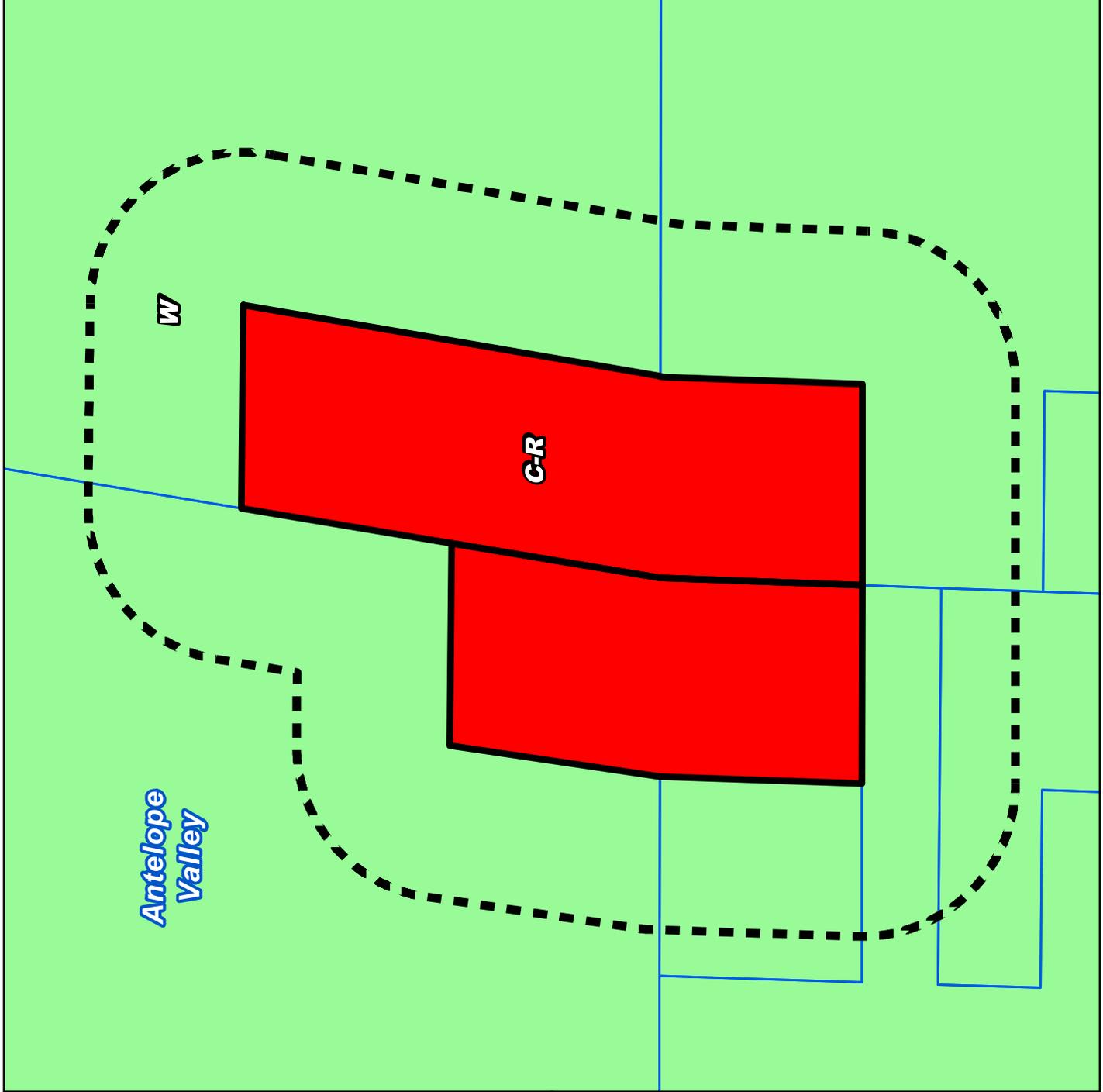


EXHIBIT H-PHOTOS



Photo #1-Trailhead parking lot



Photo #2-Trailhead parking lot

EXHIBIT H-PHOTOS



Photo #3-Sign at west property entrance



Photo #4-Existing outhouse

EXHIBIT H-PHOTOS



Photo #5-Cargo containers for storage and office



Photo #6-Bridge to Nowhere, looking northeast

EXHIBIT H-PHOTOS



Photo #7-Bridge to Nowhere, looking southwest



Photo #8-Sign at east property line

EXHIBIT H-PHOTOS



Photo #9-Bridge to Nowhere, looking west



Photo #10- Approximate location of proposed restroom

EXHIBIT H-PHOTOS



Photo #11-Helicopter hangar



Photo #12-Road to helicopter hangar

EXHIBIT H-PHOTOS



Photo #13-Helicopter landing area



Photo #14-Approximate location of proposed security booth

EXHIBIT H-PHOTOS



Photo #15- Bridge to Nowhere, with removable canopy, looking east



Photo #16- Helicopter hangar, interior



MARK PESTRELLA, Director

# COUNTY OF LOS ANGELES

## DEPARTMENT OF PUBLIC WORKS

*"To Enrich Lives Through Effective and Caring Service"*

900 SOUTH FREMONT AVENUE  
ALHAMBRA, CALIFORNIA 91803-1331  
Telephone: (626) 458-5100  
<http://dpw.lacounty.gov>

ADDRESS ALL CORRESPONDENCE TO:  
P.O. BOX 1460  
ALHAMBRA, CALIFORNIA 91802-1460

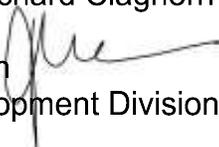
January 30, 2024

IN REPLY PLEASE

REFER TO FILE: **LD-4**

TO: Samuel Dea  
Zoning North Section  
Department of Regional Planning

Attention Richard Claghorn

FROM: James Chon   
Land Development Division

**CONDITIONAL USE PERMIT (RPPL2018004676)  
SAN GABRIEL MOUNTAINS NATIONAL MONUMENT IN HOLDING  
ASSESSOR'S MAP BOOK 8678, PAGE 002, PARCEL 8, 9, 10, 11, 15, AND 16  
UNINCORPORATED SAN GABRIEL CANYON EAST FORK**

As requested, Public Works reviewed the zoning permit application and site plan for the proposed project. The applicant is requesting a Conditional Use Permit to authorize a recreational facility (bungee jumping), private heliport, and placement of five storage containers.

- Public Works has no comments, and this memo will serve as clearance for our review.
- Public Works has comments on the submitted documents; therefore, a Public Hearing shall **NOT** be scheduled until the comments have been addressed.

If you have any questions or require additional information, please contact Ed Gerlits of Public Works, Land Development Division, at (626) 458-4953 or [egerlits@pw.lacounty.gov](mailto:egerlits@pw.lacounty.gov).

DK:la

P:\dps\SUBPCHECK\San Checking Files\OUP\RPPL2018004676 - San Gabriel Mountains National Monument Inholding\RPPL2018004676\2023-12-12 Submittal\DPW\_Cleared\_2024-01-30\_RPPL2018004676.docx

COUNTY OF LOS ANGELES • DEPARTMENT OF PUBLIC HEALTH  
ENVIRONMENTAL HEALTH

August 22, 2024

TO: Samuel Dea  
Supervising Regional Planner  
Department of Regional Planning

Attention: Richard Claghorn

FROM: Scott Abbott   
Assistant Director of Environmental Health

**SUBJECT: RPPL2018004676 – SAN GABRIEL MOUNTAINS NATIONAL  
MONUMENT INHOLDING – BUNGEE AMERICA**

The Department of Public Health -Environmental Health Division (Public Health) has reviewed the proposal for using urine-diverting composting toilets at Bungee America, located in a remote wilderness area of the San Gabriel Mountains National Monument Inholding. After carefully considering the request and reviewing the unique aspects of the project, including no road access, an inability to connect to a municipal/public sewer system and potable water supply, and an inability to install a water well and septic system, Public Health will recommend approval for the proposed use of urine-diverting composting toilets with the following conditions to be fulfilled to the satisfaction of Public Health at the permitting stage before the installation of the proposed equipment.

**Condition 1: Onsite Wastewater Treatment System: Wastewater**

- 1.1 Submit plans for the installation and usage of the proposed urine diverting composting toilet. The plans should include manufacturer specifications of all parts and equipment.
- 1.2 Provide Standard Operating Procedure for maintenance on the company letterhead to indicate the following:
  - Personal Protective Equipment required for maintenance.
  - Procedure for cleaning the maintenance equipment.
  - Detailed information on how materials are removed, and the final disposal performed.
  - Waste disposal frequency and amount.
  - Detailed information on the waste collection and disposal process.
  - Waste transportation methods to an approved waste disposal site, including types of cleaning equipment to eliminate accidental spillage of sewage waste.

- 1.3 Obtain permits for all vehicles used to transport waste material from the composting toilets to a disposal location as required by California Health and Safety Code, Sections 117400 – 117450, to the satisfaction of Public Health.

**Condition 2: Hand sanitizing**

- 2.1 Provide adequate supply of alcohol-based hand sanitizer that contains at least 60% alcohol for use on hands.
- 2.2 Ensure that hand sanitizer is maintained and serviced regularly.

Upon issuance of the Conditional Use Permit by the Department of Regional Planning, all required information as stated above must be submitted to Public Health to initiate the approval process.

If you have any other questions or require additional information, please contact Shikari Nakagawa-Ota, Director of the Environmental Protection Branch at (626) 430-5438 or [sota@ph.lacounty.gov](mailto:sota@ph.lacounty.gov).

SA:lm

c: Shikari Nakagawa-Ota, Director of Environmental Protection Branch  
Liza Frias, Director of Environmental Health



## COUNTY OF LOS ANGELES FIRE DEPARTMENT FIRE PREVENTION DIVISION

Land Development Unit  
5823 Rickenbacker Road  
Commerce, CA 90040  
Telephone (323) 890-4293, Fax (323) 890-9783

EPIC-LA NUMBER: RPPL2018004676                      PROJECT NUMBER: 2018-003069  
CITY/COMMUNITY: Angeles National Forest                      STATUS: Cleared  
PROJECT ADDRESS: San Gabriel Mountains National                      DATE: 01/08/2024  
Monument Inholding

---

### CONDITIONS

1. The proposed site plan is cleared for the continued use of regular business operations provided no additional improvements are made to the existing structures. The plans show all accepted modifications to be permitted for construction.
2. Brush clearance may be required during building plan check and inspection. All requirements for brush clearance must be complied with upon identifying violations.

For any questions regarding the report, please contact Joseph Youman at (323) 890-4243 or [joseph.youman@fire.lacounty.gov](mailto:joseph.youman@fire.lacounty.gov).

Reviewed by:

**ZINDER, KOCH & MCBRATNEY**

A PROFESSIONAL LAW CORPORATION  
15455 SAN FERNANDO MISSION BLVD., STE. 409  
MISSION HILLS, CALIFORNIA 91345  
818-760-0100  
FACSIMILE 818-760-0103

**Reply to:**

Paul R. Ayers, Esq.

Writer's Direct E-Mail:  
PAyers@ZinderKoch.com

*Of Counsel*  
Paul R. Ayers, Esq.

February 24, 2016

**BY E-TRANSMISSION ONLY**

Richard Buckner, Director  
Los Angeles County Department of Regional Planning  
320 West Temple Street, 13th Floor  
Los Angeles, California 90012

RE: **RFS No: 14-0002827/EF140610-Opposition to Request for Section 22.04.110  
Waiver**  
Our File No.:16-80232

Dear Mr. Buckner:

I am writing you on behalf of my client, Save the East Fork (hereinafter, "SEF"), an unincorporated association dedicated to the preservation and protection of the East Fork of the San Gabriel River (hereinafter, "East Fork"). This letter presents SEF's opposition to Bungee America, Mr. Ron Jones and Saunders Mine, LLC's (hereinafter, collectively "BA") request for a Los Angeles County Planning and Zoning Code Section 22.04.110 waiver (hereinafter, "Clean Hands Waiver") and to urge the Department of Regional Planning (hereinafter, "DRP") to prohibit any activities or storage on the land other than that allowed on vacant land pending completion of the Conditional Use Permit (hereinafter, "CUP") process.

**INTRODUCTION AND FACTUAL BACKGROUND**

This matter involves a parcel of land, identified as AIN 8678-002-009, located on the East Fork approximately 5 miles north of the terminus of East Fork Road (hereinafter "subject property"); title to the subject property is held by Saunders Mine, LLC, a suspended corporation. The subject property is completely surrounded by the Sheep Mountain Wilderness a part of the San Gabriel Mountains National Monument.

In and around 1936, the State of California began building a road up the East Fork; as part of the project a bridge was built across the East Fork on the subject property. In 1938 following

unprecedented rain and flooding, the road project was abandoned; the bridge remained. Since that time the bridge has become known as the “Bridge to Nowhere”. The bridge is located on and comprises a portion of the East Fork Trail; it is both a destination and a means for traveling further into the Wilderness.

At some time prior to 1996, BA began utilizing the bridge for bungee jumping. In 2001 according to a Los Angeles Times article, the State of California discovered the operation and ordered BA to cease operations citing numerous safety issues including lack of permits, inspections and insurance. It was also discovered that Mr. Jones had been operating at the site without the permission of the subject property’s owner, Gale Saunders. Regardless, it appears BA continued its activities at the subject property.

At some time prior to May 2014, the DRP learned of BA’s bungee jumping operation at the bridge. At the time, the subject property was zoned agricultural; amusement activities such as bungee jumping are not permitted on such property. Accordingly, on or around May 8, 2014, the DRP issued violation letters to Saunders Mine, LLC regarding, inter alia, the bungee jumping activity. On August 14, 2014, the DRP, upon the request of BA, issued an extension to correct the violations.

Concurrently, the new Antelope Valley Area Plan was in the process of final revision prior to presentation to the Board of Supervisors. BA persuaded the DRP to include a zoning change in the plan altering the subject property’s designation from agricultural to commercial; a bungee jumping operation could be permitted at a commercial property. The Board gave final approval to the revised Antelope Valley Area Plan including the zoning change for the subject property in June 2015.

On October 28, 2014, in anticipation of the zoning change and with the understanding that even given the change a CUP would be required for continued operation on the subject property, BA, through its attorneys, submitted a request for a Clean Hands Waiver to allow continuation of BA’s activities on the subject property pending completion of the CUP process. While the determination of the request is pending it is DRP’s apparent position that BA’s activities can continue pursuant to the August 14, 2014 extension.

#### **CLEAN HANDS WAIVER STANDARD OF REVIEW**

Los Angeles County Zoning Code section 22.04.110 permits DRP’s Director to allow continuation of operations on a property prior to the issuance of a CUP where “the use in question is consistent with the objectives, goals and policies of the General Plan, or ... is essential or desirable to the public convenience or welfare.” Insofar as SEF is aware, the continuation of a bungee jumping operation at the subject property is unrelated in any way to the “objectives goals and policies” of the relevant general plan. More importantly BA’s activities, far from being “desirable or essential”, imperil public safety and cause environmental damage. As such SEF urges the Director to deny the Clean Hands Waiver and order BA to cease operations on the subject property pending completion of the CUP process.

## **THE DIRECTOR SHOULD NOT GRANT THE CLEAN HANDS WAIVER**

### **A. BA'S OPERATIONS CREATE SEVERE SAFETY RISKS BOTH TO CLIENTS AND EMPLOYEES**

#### **1. BA Does Not Provide For Safe Travel From The Trailhead To The Subject Property**

As indicated above, the bridge used for bungee jumping is 5 miles from the end of East Fork Road; customers of the business, some 50-100 at a time, must walk both ways and ford the East Fork of the San Gabriel River 5 times to get to the site, often unaccompanied by BA staff. Forging the East Fork under any circumstances is risky; it is very dangerous at times of high water; those who balk or are slow get left behind. As a result, volunteers report numerous instances of lost, abandoned or injured BA clientele requiring assistance. It also appears that BA has no swift and high water rescue plan with regard to the dangers involved in the stream crossings.

As if to underline BA's lack of concern for the dangerous conditions to which it exposes clients hiking to the subject property, BA has failed to obtain or even apply for an Outfitter and Guide Permit which is required for commercial travel through Federal Wilderness areas. Since BA clientele must traverse about 3 miles of the Sheep Mountain Wilderness to reach the subject property such a permit is necessary

#### **2. BA's Bungee Jumping Operation At The Subject Property Is Unsafe**

The following safety issues have been observed with regard to BA's operations at the subject property:

**a. The bridge used for the bungee jumping operation is unsafe.** The bridge used for BA's operations was built many years ago; it appears that it has never been tested to see if it is safe for the purpose for which it is being used. Additionally the current railing on the bridge is in disrepair, there are gaps greater than 19 inches in the top rail and the railing is less than 39 inches in height, too low for worker or patron safety.

**b. There is no fall arrest program or procedure for workers at the bridge site.** Numerous witnesses have stated that they have never observed any BA worker use any fall protection when working on or around the bridge; the distance from the bridge to the bottom of the canyon is 120'. It should be noted that in 2010 a BA employee was found dead of blunt force trauma beneath the bridge. Although no official conclusion was drawn and there were no witnesses to the event which apparently happened at night, the most likely cause of death was that he fell off the bridge.

**c. BA fails to properly store flammables and combustibles.** Numerous witnesses have observed improperly stored gasoline, flammables and combustibles at the subject site.

**d. There is no ability to treat or transport individuals injured at the site.** It appears that there is no medic employed by BA onsite during its bungee operations. Although at one time BA had a helicopter available for medical evacuation, the illegal heliport at the subject

property has been ordered closed by the California Department of Transportation ("CDOT"). Accordingly, this option is unavailable.

e. **BA does not provide safety instruction to participants**-Every BA client questioned upon return from the subject property states that they were not given any safety instructions by BA prior to engaging in the bungee jumping activity.

## **B. BA'S ACTIVITIES CAUSE SUBSTANTIAL ENVIRONMENTAL DAMAGE**

**1. BA's Activities Damage And Degrade The Surrounding Sheep Mountain Wilderness.** As indicated above, the subject property is surrounded by the 44,000 acre Sheep Mountain Wilderness Area, a portion of the San Gabriel Mountains National Monument. Pursuant to The Wilderness Act of 1964, federally managed wilderness areas are designated for preservation in their natural condition. The Act defines wilderness as "an area where the earth and community of life are untrammelled by man, where man himself is a visitor who does not remain" and "an area of undeveloped Federal land retaining its primeval character and influence, without permanent improvements or human habitation, which is protected and managed so as to preserve its natural conditions." Observations of the effects of BA's operations on the Wilderness and the wilderness experience confirm that said operation is inconsistent with the aims and purposes of a Federal Wilderness. There are numerous, credible reports of discarded food, clothing, garbage, trash and human waste left in the Wilderness by BA clientele traveling to the subject property. The presence of boisterous, rowdy crowds of 50-100 BA customers walking through the Wilderness detracts from the outdoor experience in general and the wilderness experience in particular. Finally, the appropriation of the trailhead parking lot by BA customers deprives other visitors of access to the Wilderness.

**2. BA Does Not Comply With The Permitting Systems Designed To Protect The Wilderness And The Wilderness Experience.** As indicated above, BA refuses to obtain a federally required Outfitter and Guide Permit. This permit not only promotes safe travel but also ensures that the persons involved will not negatively impact the Wilderness. In addition neither BA's employees nor its customers have obtained Wilderness Permits; any individual entering the Sheep Mountain Wilderness must have a Wilderness Permit on their person. Again the purpose of the permit is to control the number and nature of persons entering the wilderness as a means of protecting it.

**3. BA Has Inadequate If Not Illegal Sanitation Facilities At The Subject Property.** It is SEF's understanding that a commercial operation such as is conducted by BA on the subject property requires bathroom facilities. There is an 80 year old outhouse on the site; it is unclear where the generated waste is discharged. In addition, there is a portable toilet at the subject property; apparently waste from this toilet is illegally dumped onsite. It is SEF's belief that waste from both toilets is finding its way directly or indirectly into the East Fork, a violation of both Federal and State law.

**C. BA'S ACTIVITIES AT THE SUBJECT PROPERTY ARE NOT SUSTAINABLE OVER TIME**

**1. Given Its Location Within A Federal Wilderness And National Monument BA's Activities At The Subject Property Will Ultimately Be Terminated.** Based on conversations with San Gabriel National Monument officials and personnel, there is a clear antipathy to BA's operations at the subject site. This antagonism is based on BA's failure to obtain Wilderness Outfitter and Guide Permits and Wilderness Permits, BA's setting of illegal zip lines within Wilderness boundaries, its probable discharge of effluent from sanitary facilities at the subject site into the East Fork and the degradation of the wilderness experience caused by BA clients through their noise, trash and appropriation of the trailhead parking which is owned and under control of the National Monument. As with the DRP, enforcement may be slow in coming but given a cadre of involved and active citizens, enforcement does come; when it does BA's activities at the subject property will become untenable.

**2. A Determination That The Bridge Is A Public Way Will Terminate BA's Activities.** The trail which traverses the subject property, and the bridge which comprises a portion of the trail, are subject to a finding of implied public dedication. Simply put, a trail becomes a public way, with unrestricted public access, if there has been public use of the trail for more than five years at any time prior to 1972. This office has successfully prosecuted three implied public dedication cases in the Altadena area, *Save the Altadena Trails (STAT)* v. *Traylor, et al.*, *STAT v. Cichy* and *STAT v. La Vina Homeowners Assn., et al.* In our opinion, based on public use of the trail and bridge since 1936, an action to find the trail and the bridge a public way has a high probability of success. Orders issued in conjunction with such a determination would almost certainly lead to a prohibition of BA's activities on the bridge as inimical to public access and safety.

**3. BA's Operation Will Fail Due To The Closure Of The Site Heliport.** As BA's attorneys admit in their letter of October 28, 2014, "use of a helicopter is ...essential to [BA's] ability to deliver supplies to the property". CDOT instructed BA to cease use of its illegal heliport in October 2015. Conversations with CDOT officials indicate that the no permit will be issued to allow the heliport to reopen. Without helicopter support BA cannot continue to operate on the subject property.

In addition, loss of the heliport will lead to the revocation of a license necessary for BA's continued operation. BA's bungee jumping activity is licensed by the California Division of Occupational Safety & Health, Amusement Ride Division. Every year a state inspector is required to do an on-site inspection of BA's operation at the subject property. Because of the remote location, the state has required BA to transport the inspector to the site by helicopter. Since BA has been prohibited from landing a helicopter at the subject site, it seems likely that inspections will no longer take place leading ultimately to a revocation of BA's license to operate.

**4. BA's Lack Of Basic Corporate Sustainability Is Emphasized By Its Inability To Fulfill Basic Corporate Requirements.** Less than one year ago all of the corporations associated with Mr. Jones' bungee operation on the subject property were suspended upon the request of the State Franchise Tax Board. Currently, Saunders Mine LLC, the corporation holding title to the subject property, remains suspended. There has been no fictitious name filing by BA, BA does not have a business license and so far as can be determined has made no worker's compensation payments to the Department of Industrial Relations. If BA cannot even fulfill the most basic corporate requirements how can it be expected to run a safe, viable operation on the subject property.

**D. BA DOES NOT NEED TO USE THE SUBJECT PROPERTY TO CONDUCT ITS BUSINESS**

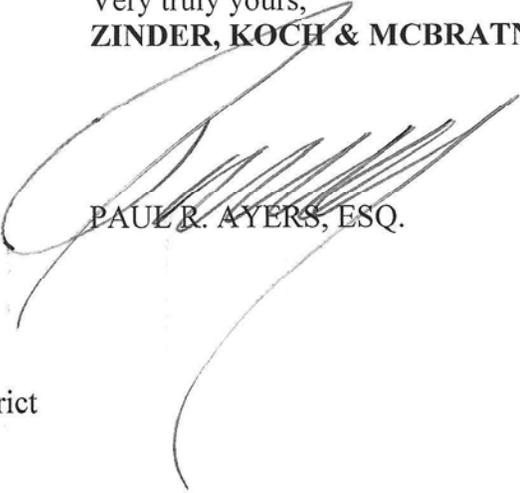
The denial of a Clean Hands Waiver and the termination of its operation at the subject property will not cause BA disproportionate hardship. This business can operate anywhere, hopefully at a location with adequate parking and sanitary facilities and immediate access to emergency medical care. BA's operation can be moved; the surrounding Sheep Mountain Wilderness cannot.

**CONCLUSION**

The DRP is being asked to allow an unsafe, environmentally destructive and marginal business to continue operations at the subject property in an advance of a CUP which almost certainly will never be granted. The request for Clean Hands Waiver should be denied and BA should be ordered to cease operations and correct any conditions on the subject property inconsistent with that allowed on vacant land.

Thank you for your courtesy and consideration

Very truly yours,  
**ZINDER, KOCH & MCBRATNEY**



PAUL R. AYERS, ESQ.

PRA:mef  
cc:  
Congresswoman Judy Chu  
United States 27<sup>th</sup> Congressional District  
Pasadena Office  
527 S. Lake Ave., Suite 106  
Pasadena, CA 91101

February 24, 2016

Page 7

Supervisor Michael D. Antonovich  
Los Angeles County Board of Supervisors  
Downtown Office  
500 West Temple Street, Room 869  
Los Angeles, CA 90012

Mr. Shane Jeffries-Interim Monument Director  
Angeles National Forest-San Gabriel Mountains National Monument  
Angeles National Forest-Supervisor's Office  
701 N. Santa Anita Ave.  
Arcadia, CA 91006-2725

Edel Vizcarra [by e-transmission only]  
Planning and Public Works Deputy  
Supervisor Michael D. Antonovich

Sussy Nemer [by e-transmission only]  
Field Deputy, Pasadena Office  
Supervisor Michael D. Antonovich

## Richard Claghorn

---

**From:** Oscar Gomez  
**Sent:** Monday, April 16, 2018 7:47 AM  
**To:** Jon Sanabria  
**Subject:** FW: Bridge to Nowhere status and parking requirements

FYI.

Oscar A. Gomez  
Supervising Regional Planner  
Zoning Enforcement North  
Los Angeles County Department of Regional Planning  
(213) 974-6483  
(213) 217-5108(Fax)

---

**From:** Steve Kuchenski [mailto:skuchenski@onyxarchitects.com]  
**Sent:** Friday, April 13, 2018 5:53 PM  
**To:** Oscar Gomez <ogomez@planning.lacounty.gov>; Thomas Dearborn <TDearborn@planning.lacounty.gov>  
**Subject:** RE: Bridge to Nowhere status and parking requirements

Oscar, following up on our conversation a couple of days ago, stating there is no further updates on any action on the Clean Hands Waiver for Bungee America / Bridge To Nowhere:

Please do let me know as soon as any further action is contemplated, and please make sure the new director reviews our ongoing concerns about the long-term impact of the county failing to enforce the code as it relates to required parking facilities for Bungee America.

To reiterate my own understanding of the situation:

- Bungee America is an amusement-park type of use on land that is under county planning jurisdiction.
- This amusement park use currently has zero parking provided.
- The amusement park is encouraging its patrons to park on property in an adjacent jurisdiction - the Angeles National Monument (ANM). To my knowledge, they are not an authorized vendor with the Forest Service, nor do they have an agreement with the ANM for parking for a county use.
- This amusement park use has impacted the availability of parking for other who wish to use the ANM. The Bungee America visitors arrive early in the day due to their long hike, and thus they take away available parking from young families that arrive later, for whom a day on the East Fork may be their only affordable opportunity to avoid the summertime heat. This is both an environmental impact and a potential social justice concern.

I understand the Forest Service will release their Angelus National Monument management plan very soon. If that plan does not already include providing parking facilities for a private use that's under county jurisdiction (Bridge to Nowhere) as part of its EIR, I think it is safe to assume Bungee America will need to provide its own shuttle or other such arrangement in order to mitigate their impact.

Further postponement, via inaction or via a Clean Hands Waiver, will not in itself mitigate real public impact of the code violation.

Thanks,

Steve Kuchenski, Principal

**ONYX ARCHITECTS**

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[skuchenski@onyxarchitects.com](mailto:skuchenski@onyxarchitects.com)

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**From:** Oscar Gomez [<mailto:ogomez@planning.lacounty.gov>]

**Sent:** Wednesday, April 19, 2017 6:50 PM

**To:** Steve Kuchenski <[skuchenski@onyxarchitects.com](mailto:skuchenski@onyxarchitects.com)>; Thomas Dearborn <[TDearborn@planning.lacounty.gov](mailto:TDearborn@planning.lacounty.gov)>

**Subject:** RE: Bridge to Nowhere status and parking requirements

Steve,

I apologize for the delay. We do not have any new updates. The Director has not made a determination on the clean hands waiver.

If we hear of something, we can let you know.

Oscar A. Gomez

Supervising Regional Planner

Zoning Enforcement North

Los Angeles County Department of Regional Planning

(213) 974-6483

(213) 217-5108(Fax)

---

**From:** Steve Kuchenski [<mailto:skuchenski@onyxarchitects.com>]

**Sent:** Friday, April 14, 2017 3:52 PM

**To:** Thomas Dearborn <[TDearborn@planning.lacounty.gov](mailto:TDearborn@planning.lacounty.gov)>

**Cc:** Oscar Gomez <[ogomez@planning.lacounty.gov](mailto:ogomez@planning.lacounty.gov)>

**Subject:** RE: Bridge to Nowhere status and parking requirements

Thomas, I got an automatic reply from Sabina Roan saying she is no longer with LA County Planning effective 4/13/17. She had been working on the application for the Clean Hands Waiver for Bungee America's "Bridge To Nowhere" at the East Fork San Gabriel River. I am on the Conservation Committee of the Pasadena Casting Club, and we have an ongoing interest in the conservation and recreational use around this river, which has been designated Wild & Scenic for preservation of the coastal rainbow trout. (See the partial email thread below.)

I asked Sabina to keep me updated, but I haven't heard anything from her since last October. Can you give me and update on the Clean Hands Waiver and code enforcement status?

Steve Kuchenski

San Gabriel, CA

---

**From:** Steve Kuchenski

**Sent:** Friday, April 14, 2017 3:37 PM

**To:** 'Sabina Roan'  
**Cc:** Oscar Gomez  
**Subject:** RE: Bridge to Nowhere status and parking requirements

Sabina, has there been any further update on the Clean Hands Waiver request since we last discussed it 6 months ago?

Steve

---

**From:** Sabina Roan [<mailto:SRoan@planning.lacounty.gov>]  
**Sent:** Wednesday, October 05, 2016 8:33 AM  
**To:** Steve Kuchenski  
**Cc:** Oscar Gomez  
**Subject:** RE: Bridge to Nowhere status and parking requirements

Hi Steve,

Thank you for your message. There have been no new developments, but you are on my list to contact when there are updates.

**Sabina Roan**

Planning Assistant II  
Zoning Enforcement North  
Department of Regional Planning  
<http://planning.lacounty.gov>  
Tel. (213) 974-6483 | Fax. (213) 217-5108



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**From:** Steve Kuchenski [<mailto:skuchenski@onyxarchitects.com>]  
**Sent:** Tuesday, October 04, 2016 5:17 PM  
**To:** Sabina Roan <[SRoan@planning.lacounty.gov](mailto:SRoan@planning.lacounty.gov)>  
**Cc:** Oscar Gomez <[ogomez@planning.lacounty.gov](mailto:ogomez@planning.lacounty.gov)>  
**Subject:** RE: Bridge to Nowhere status and parking requirements

Just checking in - - any further updates on the Bridge to Nowhere Clean Hands Waiver request?

Steve Kuchenski  
mobile 626-644-5824

---

**From:** Sabina Roan [<mailto:SRoan@planning.lacounty.gov>]  
**Sent:** Tuesday, July 19, 2016 11:42 AM  
**To:** Steve Kuchenski  
**Cc:** Oscar Gomez  
**Subject:** RE: Bridge to Nowhere status and parking requirements

Steve,

You are correct that the operation would need to obtain a Conditional Use Permit (CUP) to be permitted by the Department of Regional Planning.

In regards to your questions:

- Proof of adequate parking is a requirement of a CUP application. If an applicant fails to show compliance with the parking requirements, the applicant will be required to file for a Parking Permit (PK) requesting less than the required parking and/or for off-site parking. Our planners review every application to ensure it complies with current requirements.
- If the operation is not granted a Clean Hands Waiver and is not covered by an approved CUP, enforcement action will be taken to bring the site into compliance with the County Zoning Code. Our process involves issuance of notices, assessment of noncompliance fees, and, with continued noncompliance, filing of civil or criminal cases. We work with the offices of the Treasurer and Tax Collector, District Attorney, and County Counsel in these cases.

Thank you for your interest. Let me know if I can be of assistance in answering any other questions you may have.

**Sabina Roan**

Planning Assistant II  
Zoning Enforcement North  
Department of Regional Planning  
<http://planning.lacounty.gov>  
Tel. (213) 974-6483 | Fax. (213) 217-5108



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**From:** Steve Kuchenski [<mailto:skuchenski@onyxarchitects.com>]

**Sent:** Tuesday, June 28, 2016 12:13 PM

**To:** Sabina Roan <[SRoan@planning.lacounty.gov](mailto:SRoan@planning.lacounty.gov)>

**Subject:** RE: Bridge to Nowhere status and parking requirements

Sabina, thank you for your response. I have some follow-up questions:

- Prior to a planning application getting submitted to DRP by the owner of Bungee America (BA) -- does DRP have any formal process to evaluate the adequacy of offsite parking at this time?
- Is there anything, other than the threat to enforce DRP sanctions, that would assure the public that BA is compelled to complete such an application for their ongoing use?

If the answer to both questions is "no", then it is all the more reason to withhold a clean hands waiver from Bungee America. If the owner believes that planning code will not be enforced on their site, then there is no incentive or pressure for them to comply with code, or to commence the arduous but necessary process of developing/coordinating a parking solution with various county and federal agencies.

I have a separate but related question: what kind of land use application would you normally anticipate BA to submit in order to continue their (currently unauthorized) use? According to my reading of the code, the bungee operation most closely resembles an amusement ride, which requires a CUP in a C-R zone. Is that correct?

Steve

---

**From:** Sabina Roan [<mailto:SRoan@planning.lacounty.gov>]  
**Sent:** Tuesday, June 28, 2016 9:01 AM  
**To:** Steve Kuchenski  
**Subject:** RE: Bridge to Nowhere status and parking requirements

Steve,

We apologize for the delay in responding to your follow-up questions. Please see responses to your questions below.

A decision regarding the Clean Hands Waiver has not been made. At this moment we are unable to give you a date. However, as soon as we know we will let you know.

You are right in indicating that the Bridge to Nowhere (BTN) is under jurisdiction of the County. However, the parking lot and trails to access BTN are owned by the National Forest. In regards to our reference to National Forest requirements, this pertains to any requirements the National Forest imposes on the use of their lands, in particular the parking lot and trails used by BA to access BTN.

The parking requirements for the Bungee Jump operation are required and will be enforced by the County because as you mentioned BTN is within the unincorporated Los Angeles County. At this moment, the owner of BTN has not conducted a parking study. Additionally, the Department of Regional Planning has not made a determination of the number of required parking spaces. **The required parking is determined once an applicant has submitted an application, required plans, and detailed description of the use.**

The county has not determined the required parking for a campground. Because the zoning code does not specifically mention parking requirements for a camping use, there would be two ways the parking can be calculated for such use. If there is an assembly area, the parking is calculated based on the occupant which is determined by the L.A. County Office of Building and Safety. Current requirements for assembly uses is 1 parking space per each 3 persons based on the occupant load, i.e. 30 person occupant load=10 parking spaces.

Where parking requirements are not specifically mentioned, the zoning code provides that the Director shall determine the required parking adequate to prevent traffic congestion and excessive street parking. The parking would be determined after the applicant submits an application, plans, and detail description of the proposed use.

Thank you for your interest and for contacting us. We will update you once we have more information.

**Sabina Roan**

Planning Assistant II  
Zoning Enforcement North  
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**From:** Steve Kuchenski [<mailto:skuchenski@onyxarchitects.com>]  
**Sent:** Thursday, March 24, 2016 5:27 PM  
**To:** Sabina Roan  
**Subject:** FW: Bridge to Nowhere status and parking requirements

Sabina, I am attaching the response letter I received from Richard Bruckner regarding the Bungee America (BN) "Bridge to Nowhere" (BTN) Clean Hands Waiver. In the letter, Richard suggested I contact you with further questions. My questions are as follows:

Regarding the Clean Hands Waiver:

1. What is the current status of the Clean Hands Waiver request, and when will a decision be made?

Regarding parking:

2. The letter says that BA must comply with National Forest requirements for parking and access. However, to my knowledge BA is not an approved vendor with the Forest Service (FS). Furthermore, the BTN is on land under jurisdiction of the County. My concern is that the county will look to the FS for compliance, and the FS will defer to the county's authority, and compliance might fall between the cracks.

**Therefore, I would like to know the county's own calculation / determination as to the number of required parking spaces required for the employees and customers of BA on the BTN land under county jurisdiction.** Has a parking study been prepared, or are you utilizing the area of the land or amusement structure (the area of the bridge)?

Regarding camping:

3. I realize that a camping use is allowed by-right in a C-R zone, but again the question arises as to the required parking for this by-right camping use. Has the county come up with a stall count for this?

Once we know the county's minimum parking requirements, this will enable the general public to provide reasonable input to the FS regarding any agreement for allocating limited FS parking spaces to a private entity under county jurisdiction.

Thanks,

Steve Kuchenski, Principal

**ONYX ARCHITECTS**  
316 N. Sierra Madre Blvd.  
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**From:** Steve Kuchenski <kuchenski@gmail.com>  
**Sent:** Tuesday, October 30, 2018 8:26 AM  
**To:** Thuy Hua  
**Subject:** Re: CUP 2018-004676 and Parking Permit 2018-004677 for Bungee America

Thank you for your response. Yes, please include me in any courtesy notifications by emailing me at [kuchgeneral@gmail.com](mailto:kuchgeneral@gmail.com).

I hope to make an appointment to view the application documents sometime in the next few weeks. Meanwhile, may I also ask for pdfs of the following, if available to the public:

- A copy of the original letter from Cynthia Morgan, requesting the Clean Hands Waiver.
- A copy of the field inspection record and any related notes, per item 2, page 2 of the Clean Hands Waiver notification letter.

Thanks,

Steve

On Mon, Oct 29, 2018 at 9:13 AM Thuy Hua <[THua@planning.lacounty.gov](mailto:THua@planning.lacounty.gov)> wrote:

Steve,

Please see my responses to your questions below in blue.

**Thuy Hua, AICP**

Los Angeles County

Department of Regional Planning

320 W Temple St 13<sup>th</sup> Flr

Los Angeles, CA 90012

(P) 213-974-6443

<http://planning.lacounty.gov>

**From:** Steve Kuchenski <[kuchenski@gmail.com](mailto:kuchenski@gmail.com)>

**Sent:** Friday, October 26, 2018 8:34 AM

**To:** Thuy Hua <[THua@planning.lacounty.gov](mailto:THua@planning.lacounty.gov)>

**Subject:** CUP 2018-004676 and Parking Permit 2018-004677 for Bungee America

Thuy Hua: My name is Steve Kuchenski, and I am interested in the status of the applications CUP 2018004676 and Parking Permit 2018004677, as well as any CEQA studies, for the Bungee America operations in our local mountains. I am especially concerned by the impact of their operation on the parking capacity near the trailhead, and the resulting diminished access for other visitors to the East Fork. I am also concerned about the noise impact (helicopters, amplified music) on the adjacent wilderness experience. I am interested in any mitigation measures proposed for this. My specific questions are:

- Where can I view a copy of the applications and proposals? [Application materials for CUP 2018004676 and Variance \(for the parking\) 2018004861, collectively known as Project No. 2018-003069, are available at our Main Office in Downtown Los Angeles. The address is Hall of Records, 320 W Temple St 13<sup>th</sup> Floor, Los Angeles, 90012. You will need to make an appointment with me to view the materials.](#)
- Where can I see a copy of the CEQA initial checklist? [The Environmental Assessment Information Form is a part of the application and can be viewed concurrently with the rest of the application materials.](#)
- Who is conducting the CEQA? What studies are being proposed? [The review of the Environmental Assessment Information Form, information provided by the applicant to the County to determine what type of CEQA review is necessary, is conducted by the County. The application for the project is currently incomplete and therefore the full CEQA review has not yet been initiated.](#)
- Is there a process for providing input into the CEQA during the study period? [Should it be determined that an Environmental Impact Report be required for the project, there will be public notification periods as a part of that preparation and review process. All other environmental assessment documents do not have a public comment period during the preparation of the document. However, you are able to provide a public comment letter if there is information you want included as a part of the public record.](#)
- Given that the site is landlocked by the National Monument, is there any CEQA coordination with the ANM environmental studies and plans? If so, who is the Lead Agency? [We have been in contact with the U.S. Forest Service, most recently Adrienne Dunfee who is the Deputy Monument Manager. The project is requesting permits from the County and thus the Lead Agency on the CEQA analysis is the County.](#)
- Is there any community meeting or community outreach planned, prior to the formal public notice of the discretionary approval hearings? [At this time there are no community meetings scheduled, however you can be notified via the courtesy notification list if one is scheduled.](#)
- Is there a procedure for interested parties to be registered to be directly notified (e.g. an email distribution list) for activities related to these applications, rather than just hoping to spot a legal notice in a newspaper or seeing a sign posted in the forest? [Via email or letter correspondence to me, any interested parties can be requested to be included on this project's](#)

courtesy notification list. Please provide your preferred method of contact and corresponding contact information.

I look forward to your response.

Thanks,

Steve Kuchenski

San Gabriel, CA

**PAUL R. AYERS**  
ATTORNEY AT LAW  
1681 ALAMO DR.  
GLENDALE, CALIFORNIA 91207  
818-378-3217

*Reply to:*  
Paul R. Ayers, Esq.

Writer's Direct E-Mail:  
ayerspaul@sbcglobal.net

March 11, 2019

**BY E-TRANSMISSION ONLY**

Patrick Miles, Aviation Safety Officer, Area V  
Division of Aeronautics-MS40  
California Department of Transportation  
1120 N St., Rm. 3300  
Sacramento, CA, 95814-5606

RE: **Unlawful Operation of Heliport by Bungee America, Failure of Bungee America to apply for permit for Commercial use of Heliport**

Dear Mr. Miles:

I am writing on behalf of Save the East Fork, an unincorporated association. It has come to our attention that Ron Jones and Bungee America (collectively "BA") have violated the "personal use" limitation on its operation of a heliport at BA's "Bridge to Nowhere" site on the East Fork of the San Gabriel River. ("heliport" or "subject heliport".) Accordingly, I am urging the Division of Aeronautics, California Department of Transportation ("CDOT"); to reestablish its earlier cease and desist order prohibiting any use by BA of said heliport.

Additionally, this letter will confirm our conversation of March 8, 2019 wherein you informed me that BA had not applied for any permit with your office or otherwise taken any steps to reestablish commercial use of the subject heliport.

**VIOLATION OF TERMS OF CDOT NOVEMBER 29, 2016 LETTER BY BA**

On October 5, 2016 your office issued a "cease and desist" letter forbidding BA from any use of the subject heliport. In your letter of November 29, 2016 [attached hereto as Exhibit "A"] you rescinded the cease and desist order with the qualification that the heliport, "not be used in connection with transporting supplies, equipment, or revenue passengers, **or in any other capacity that supports commercial activities.**" [emphasis added.] Based on a Los Angeles County Department of Regional Planning ("DRP") inspection report dated August 31, 2018 it appears that BA has by its own admission violated that restriction by using the heliport to

March 11, 2019

Page 2

transport human waste generated by BA's employees and guests away from the site, an action which additionally appears to be in violation of Los Angeles County health regulations; a true and correct copy of the DRP inspection report is attached hereto as Exhibit "B". Given this latest unlawful action and BA's prior violations of CDOT standards it would be my expectation that the CDOT will again prohibit BA from using the subject heliport in any manner whatsoever.

**FAILURE OF BA TO APPLY FOR AVIATION PERMIT**

In our telephone conversation of March 8, 2019 you informed me that BA had made no application nor taken any other steps to reestablish commercial use of the subject heliport. I opined that given the terrain involved and other factors it seemed unlikely to me that the CDOT would ever allow future commercial use of the heliport.

As you may be aware BA is being allowed to continue its bungee-jumping operation at its Bridge to Nowhere site pursuant to a DPR "clean hands waiver" which expires on March 31, 2019. If CDOT shares my opinion on the improbability of BA ever being allowed to resume commercial operation at the subject heliport, I would urge you to share this belief with the DPR as I believe it is position of all parties to this matter that without the ability to use the heliport in support of BA's commercial enterprise, said enterprise is not viable.

I look forward to learning what actions the CDOT will take as to BA's continued operation of the subject heliport based on the issues raised in this letter.

Thank you for your courtesy and consideration in this matter.

Very truly yours,

**-S-**

PAUL R. AYERS, ESQ.

PRA:mef

cc:

Raiyn Bain, Esq., Legal Division [by e-transmission only]

Division of Aeronautics-MS40

California Department of Transportation

1120 N St., Rm. 3300

Sacramento, CA, 95814-5606

Matthew Bokach, Monument Manager [by e-transmission only]

Adrienne E. Dunfee, Deputy Monument Manager

USDA-FS, San Gabriel Mountains National Monument

110 N. Wabash Ave.

Glendora, CA 91741

March 11, 2019

Page 3

Supervisor Kathryn Barger  
Los Angeles County Board of Supervisors  
Downtown Office  
500 West Temple Street, Room 869  
Los Angeles, CA 90012

Oscar Gomez, Supervising Regional Planner [by e-transmission only]  
Los Angeles County Department of Regional Planning  
320 West Temple Street, 13th Floor  
Los Angeles, California 90012

Louis Sahagun, Staff Writer [by e-transmission only]  
Los Angeles Times  
Times Mirror Square  
Los Angeles, CA 90053

Edel Vizcarra [by e-transmission only]  
Planning and Public Works Deputy  
Supervisor Kathryn Barger

Sussy Nemer [by e-transmission only]  
Field Deputy, Pasadena Office  
Supervisor Kathryn Barger

Isabella C. Kwok, MPA, REHS [by e-transmission only]  
Chief Environmental Health Specialist  
Los Angeles County Department of Public Health

Thomas Dearborn [by e-transmission only]  
Regional Planner  
Los Angeles County Department of Regional Planning

Jose De La Rosa [by e-transmission only]  
Regional Planner  
Los Angeles County Department of Regional Planning

Samuel Dia [by e-transmission only]  
Regional Planner  
Los Angeles County Department of Regional Planning

**DEPARTMENT OF TRANSPORTATION**

DIVISION OF AERONAUTICS – M.S. #40

1120 N STREET

P. O. BOX 942874

SACRAMENTO, CA 94274-0001

PHONE (916) 654-4959

FAX (916) 653-9531

TTY 711

www.dot.ca.gov

General Correspondence  
Los Angeles County



*Serious drought!  
Help Save Water!*

November 29, 2016

Dr. Ron Jones  
Bungee America  
16654 Soledad Canyon Road, Suite 464  
Canyon Country, CA 91387-3217

Dear Dr. Jones:

The California Department of Transportation, Division of Aeronautics has reviewed your request to operate a heliport on your personal property located approximately 20 miles northeast of Azusa, California in accordance with the California Code of Regulations (CCR), section 3533, paragraph (b)(3), which exempts personal-use heliports located in unincorporated areas.

Your heliport is exempt from State heliport permit requirements if its use is limited to non-commercial activities and it meets the layout criteria described in Article 5 of the CCR. Please see enclosure. This exemption will be immediately nullified if your heliport is not operated in accordance with the following restrictions: It may not be used in connection with transporting supplies, equipment, or revenue passengers, or in any other capacity that supports commercial activities as defined as follows in CCR, section 3527(d):

Those activities which may offer a facility, service or commodity for sale, hire, profit, or any other business purpose. Examples of commodities for sale are: food, lodging, entertainment, real estate, petroleum products, parts and equipment. Examples of services are: flight training, charter flights, maintenance, aircraft storage and tie-down. Examples of a facility used for a business purpose are: facility used for the transport of persons for a corporate business purpose and a facility used to transport persons for compensation or hire.

Our cease and desist letter to you dated October 5, 2016, is hereby rescinded, as long as your personal-use facility is operated in accordance with the restrictions listed above.

If you have questions or require additional assistance, please contact me at (916) 654-5376, or via e-mail at: patrick.miles@dot.ca.gov.

Sincerely,  
*Original signed by*

PATRICK J. MILES  
Aviation Safety Officer

Enclosure

c: Zoning Enforcement Office, Department of Regional Planning, 320 West Temple Street,  
Los Angeles, California 90012-3208

bc: Gary Slater, District Deputy Director Planning, District 7  
Raiyn Bain, Attorney, Legal Division

Patrick Miles.do

s:\z\pm-Bungee America, HP

*"Provide a safe, sustainable, integrated, and efficient transportation system  
to enhance California's economy and livability"*

**EXHIBIT "A"**

CODE DETAILED REPORT (14-0002827)

11. INSPECTION 08/31/2018:

Thomas Dearborn

9/12/2018 12:34 pm

Investigating Planner - Thomas Dearborn

Contact - Ron Jones, Property owner - Gretchen Jones

Inspection conducted by Thomas Dearborn and Oscar Gomez.

Mr. Dearborn and Mr. Gomez met Mrs. Jones at the trailhead for

guided hike to Bridge to Nowhere site. The hike took

approximately 2 hours to get to the site. They met Mr. Jones who

was already at the property. The planners sat down and

discussed the operations conducted at Bungee America which

consist of bungee jumping and a zip line course. Mr. Jones

stated that patrons park at the trail head and hike the

approximate 5 miles to the site. They typically have an employee

meet and guide the patrons. People are able to register in

advanced or do on-site registration if they hike to the site without

a guide. Hours of operation are approximately 7:00AM to 4:00PM

including hike time to and from site. They provide the option to

hike back with staff but Mr. Jones stated that most people

choose to hike back alone. They require a signed safety waiver

regulated by DOSH. The state inspects the bridge every year

and provides owners with a certificate after the inspection.

Along with the bungee and zip line activities they conduct

overnight camping experiences in which people camp in tents

and partake in high time recreational activities (bungee and

zipline). Mr. Jones stated there is a caretakers unit in one of the

cargo containers in which employees stay in a retractable bed

overnight when necessary, particularly when guests are camping

or they are setup for bungee jumping during the weekends.

There is a cargo container behind the caretaker unit used for

storage. Approximately a caretaker onsite 52 days a year.

There are signs that identify the property line along the trail.

There were also brass caps installed by the US Forest service

identifying corners of the property. Only one of these caps was

visible during the inspection. There are four cargo containers

located at base camp and one where the helicopter is stored. A

concrete building holds a self contained restroom in which Mr.

Jones demonstrated the bucket system he utilizes to contain and

remove waste from the site. He transports out the waste via

helicopter and takes it to an LA County certified septic facility.

The bridge is where the bungee jumping occurs. Bungee

equipment is setup and taken down each day that the business

is operating. Jumpers and spectators are provided wristbands to

identify patrons that are part of the operation and are allowed to

use restroom facilities.

Mr. Jones suggested that he would like to make the facade of

the cargo containers more similar to the surrounding

environment down the road. Mr. Dearborn and Mr. Gomez

instructed him to draft a proposal and to submit it with the CUP

application but to not make changes on site at this point in time.

There is an old portable toilet on its side located in a valley on

the way to the helicopter storage area. There is a helicopter

landing site on the western portion of the property.

EXHIBIT "B"

**VIA U.S. MAIL & E-MAIL**

02/15/2022

County of Los Angeles Department of Regional Planning  
320 W Temple St  
Los Angeles CA 90012  
Em: [info@planning.lacounty.gov](mailto:info@planning.lacounty.gov)

Supervisor Kathyn Barger  
C/O Sandra Croxton, Field Deputy, East San Gabriel Valley  
500 West Temple Street, Room 869  
Los Angeles, CA 90012  
Em: [Kathryn@bos.lacounty.gov](mailto:Kathryn@bos.lacounty.gov)

RE: Comments on Illegal Bungee America Operation

To Whom It May Concern:

As a resident of Altadena, in Los Angeles County. I am writing to express my opposition to the illegal bungee jumping operations of Bungee America at the Bridge to Nowhere.

The property where Bungie America is located is not designed for commercial use. The former site was a vacant land not used for any commercial purposes. Introduction of bungee jumping, zip line ridges or using helicopters is a significant change to the purpose of the land. It is a wilderness area and its use should remain consistent with low-impact and non-ecologically damaging activities.

The owner of Bungie America has not obtained a federally required Outfitter and Guide Permit that is required for commercial travel through the Federal Wilderness Areas. Bungee jumpers walk about 3 miles through Sheep Mountain Wilderness, a federal wilderness area to reach the Bungee Property. Any individual entering Sheep Mountain Wilderness must have a Wilderness permit. However, to date, Bungee America still has not and continues to flout federal regulations in doing so.

The East Fork region of the San Gabriel River was designated as Wild and Heritage Trout Waters by the California Fish and Game Commission. The designation guarantees public access rights to the rivers and canyons above and below the bridge. Despite that, Bungee America has placed trespass warning signs intended to keep the public out. In doing so Bungee America has also defied the California Fish and Game Commission in addition to Federal regulations.

Bungee America creates crowds of traffic, taking over the publicly owned parking lot at the end of East Fork road. Bungee jumpers detract and disrupt the outdoor experience and wilderness experience.

As a resident of LA county, a US Public Landowner, and as a person concerned with conservation, I strongly urge the Department to step in and stop the illegal operations of Bungee America.

Sincerely,

Ross Thomas  
1917 Sinaloa Ave  
Altadena CA 91001  
Cc: Ben White, TrailAngeles.org

View this message in the context of the forum.

**Re:** [mailto:Kathy.Hager@usfs.gov] - 2008-05-04  
**Subject:** Re: Supervisor Kathy Hager "Treatment business meeting 8/4/08"

**From:** [mailto:Kathy.Hager@usfs.gov] - 2008-05-04  
**Subject:** Re: Supervisor Kathy Hager "Treatment business meeting 8/4/08"

Hi M. Dan,  
This is in response to Supervisor Hager's office to you and as this and any follow up correspondence concerning this issue be part of the online Bungee America's Conditional Use Permit file. Also I have not received any copies of documents for water disposal from you for the Bungee operations at the Bridge to Nowhere. Can you send me updates on this issue?

Please note that the US Forest Service now has directives about no smoking at any trailheads in the Angeles National Forest/San Gabriel Mountains National Monument. This would make access to the Bridge to Nowhere impossible for any customer for the Bungee America since the most available recreations are the 28th and 26th of April. As per a facebook post the company was going to have a during the week's lesson on the 10th of April.

Thank you for your interest.

**From:** [mailto:Kathy.Hager@usfs.gov] - 2008-05-04  
**Subject:** Re: Supervisor Kathy Hager "Treatment business meeting 8/4/08"

Good afternoon Ben,

Thank you for your email. Supervisor Hager asked me to respond directly to you concerns. We will flow all this information to the Department of Public Affairs and ask them to investigate.

**From:** [mailto:Kathy.Hager@usfs.gov] - 2008-05-04  
**Subject:** Re: Supervisor Kathy Hager "Treatment business meeting 8/4/08"

-----Original Message-----  
**From:** [mailto:Kathy.Hager@usfs.gov] - 2008-05-04  
**Subject:** Re: Supervisor Kathy Hager "Treatment business meeting 8/4/08"

**From:** [mailto:Kathy.Hager@usfs.gov] - 2008-05-04  
**Subject:** Re: Supervisor Kathy Hager "Treatment business meeting 8/4/08"

**Number:** 03080175  
**7/3 Sacramento Blvd**

**City:** Sacramento  
**State:** California  
**Office Location:** Sacramento, CA

**Department:** Forest Management  
**Division:** Forest Management  
**Section:** Forest Management

**Supervisor:** Kathy Hager  
**Phone:** (916) 433-1311  
**Fax:** (916) 433-1311

**Internet:** [kathy.hager@usfs.gov](mailto:kathy.hager@usfs.gov)  
**Web:** [www.usfs.gov](http://www.usfs.gov)

**Subject:** Re: Supervisor Kathy Hager "Treatment business meeting 8/4/08"

-----Original Message-----  
**From:** [mailto:Kathy.Hager@usfs.gov] - 2008-05-04  
**Subject:** Re: Supervisor Kathy Hager "Treatment business meeting 8/4/08"

**Number:** 03080175  
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**Section:** Forest Management

**Supervisor:** Kathy Hager  
**Phone:** (916) 433-1311  
**Fax:** (916) 433-1311

**Internet:** [kathy.hager@usfs.gov](mailto:kathy.hager@usfs.gov)  
**Web:** [www.usfs.gov](http://www.usfs.gov)

**Subject:** Re: Supervisor Kathy Hager "Treatment business meeting 8/4/08"

-----Original Message-----  
**From:** [mailto:Kathy.Hager@usfs.gov] - 2008-05-04  
**Subject:** Re: Supervisor Kathy Hager "Treatment business meeting 8/4/08"

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**Supervisor:** Kathy Hager  
**Phone:** (916) 433-1311  
**Fax:** (916) 433-1311

**Internet:** [kathy.hager@usfs.gov](mailto:kathy.hager@usfs.gov)  
**Web:** [www.usfs.gov](http://www.usfs.gov)

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**From:** ben white <[bwootenwhite@hotmail.com](mailto:bwootenwhite@hotmail.com)>  
**Sent:** Wednesday, June 3, 2020 6:57 AM  
**To:** Ramon Cordova <[rcordova@planning.lacounty.gov](mailto:rcordova@planning.lacounty.gov)>  
**Subject:** Fw: Bridge to Nowhere,Bungee America

**CAUTION:** External Email. Proceed Responsibly.

Dear Mr. Cordova,  
Please add the following correspondence to Mr. Jones'/Bungee America file.  
This is my second letter to Supervisor Barger about Bungee America not adhering to the restrictions imposed by the state and county regarding doing business or not during the virus crisis. Thank you very much,best regards,Ben White, Save the East Fork

---

**From:** ben white  
**Sent:** Tuesday, June 2, 2020 5:39 PM  
**To:** [Kathryn@bos.lacounty.gov](mailto:Kathryn@bos.lacounty.gov) <[Kathryn@bos.lacounty.gov](mailto:Kathryn@bos.lacounty.gov)>  
**Subject:** Bridge to Nowhere,Bungee America

To. Ms. Kathryn Barger  
Los Angeles County Supervisor

Dear Ms. Barger,  
I want to bring to your attention that Bungee America is still doing business in the Sheep Mountain Wilderness. I presume that he would need permission to restart or do business during this time. Recently there was an incident where the owner of the bungee jumping business,Ron Jones,put his hands on a hiker using the bridge,and told this hiker and others in the party that they couldn't use the bridge. The bridge has been used for hiking for over 50 years. In the photos that the hiker who reported the incident there were crowds of people at the bridge, there was no one wearing a mask, and no attempt at social distancing.

Mr. Jones has a helicopter that he uses to ferry goods to the bridge. Jones doesn't have a permit to run a heliport at this location, and is in violation of the FAA guidelines regarding flying in and over Wilderness Areas.

Jones does not have a permit to have a restroom at the bridge, and has no permit to transport human wastes from this location.

This situation has been going on for years, yet he is still able to do business.

I trust something can be done about this blatant disregard for public health and hiking right of way.

Thank you,

Best regards, Ben White, Chairperson, Save the East Fork



**VIA U.S. MAIL & E-MAIL**

February 16, 2022

County of Los Angeles Department of Regional Planning  
320 W Temple St  
Los Angeles CA 90012  
Em: [info@planning.lacounty.gov](mailto:info@planning.lacounty.gov)

Supervisor Kathyn Barger  
C/O Sandra Croxton, Field Deputy, East San Gabriel Valley  
500 West Temple Street, Room 869  
Los Angeles, CA 90012  
Em: [Kathryn@bos.lacounty.gov](mailto:Kathryn@bos.lacounty.gov)

RE: Comments on Illegal Bungee America Operation

To Whom It May Concern:

As a resident of Glendora, I am expressing concern about the illegal bungee jumping operations of Bungee America at the Bridge to Nowhere.

1. The property where Bungee America is located is not designed for commercial use. The former site was vacant land not used for any commercial purposes. Introduction of bungee jumping, zip line ridges or using helicopters is a significant change to the purpose of the land.
2. The owner of Bungee America has not obtained a federally required Outfitter and Guide Permit that is required for commercial travel through the Federal Wilderness Areas. Bungee jumpers walk about 3 miles through Sheep Mountain Wilderness, a federal wilderness area to reach the Bungee Property. Any individual entering Sheep Mountain Wilderness must have a Wilderness permit. However, to date, Bungee America still has not and continues to flout federal regulations in doing so.
3. The East Fork region of the San Gabriel River was designated as Wild and Heritage Trout Waters by the California Fish and Game Commission. The designation guarantees public access rights to the rivers and canyons above and below the bridge. Despite that, Bungee America has placed trespass warning signs intended to keep the public out. In doing so

Bungee America has also defied the California Fish and Game Commission in addition to Federal regulations.

4. Bungee America creates crowds of traffic, taking over the publicly owned parking lot at the end of East Fork road. Bungee jumpers detract and disrupt the outdoor experience and wilderness experience.

As a resident, I strongly urge the Department to step in and stop the illegal operations of Bungee America.

Sincerely,

Geric Johnson  
President, Angeles Volunteer Association  
926 E Mountain View Ave.  
Glendora, CA 91741

cc: Ben White, Save the East Fork, and San Gabriel Mountains Trailbuilders.

**From:** [Richard Claghorn](#)  
**To:** [Edward Rojas](#)  
**Subject:** Re: Bungee America - Opposition Letter  
**Date:** Wednesday, February 16, 2022 9:12:24 AM

---

Hi Ed,

Yes, it is. Thanks.

Richard Claghorn  
Principal Regional Planner  
North County Development Services Section  
Department of Regional Planning

***We Appreciate Your Feedback!***

*Please take a moment and fill out our EPIC-LA customer experience survey by clicking on the link below:*

[https://bit.ly/LACoCSSurvey](https://bit.ly/LACoCSSSurvey)

*In response to increased case rates of COVID-19 in Los Angeles County and to protect the health and safety of employees and the public, Regional Planning will be providing all public services virtually. For the most current information about available services, public meeting schedules, and planning projects, please visit [planning.lacounty.gov](http://planning.lacounty.gov).*

---

**From:** Edward Rojas <erojas@planning.lacounty.gov>  
**Sent:** Wednesday, February 16, 2022 8:47 AM  
**To:** Richard Claghorn <rclaghorn@planning.lacounty.gov>  
**Subject:** FW: Bungee America - Opposition Letter

Hi Richard,

Is this for your case?

**Edward Rojas, AICP** | Supervising Regional Planner  
Operations and Major Projects

---

**From:** DRP Info <info@planning.lacounty.gov>  
**Sent:** Wednesday, February 16, 2022 8:43 AM  
**To:** Edward Rojas <erojas@planning.lacounty.gov>  
**Subject:** FW: Bungee America - Opposition Letter

---

**From:** Ross Thomas <[rmthomas2@gmail.com](mailto:rmthomas2@gmail.com)>  
**Sent:** Tuesday, February 15, 2022 12:28 PM  
**To:** DRP Info <[info@planning.lacounty.gov](mailto:info@planning.lacounty.gov)>; Barger, Kathryn <[Kathryn@bos.lacounty.gov](mailto:Kathryn@bos.lacounty.gov)>  
**Cc:** [bwootenwhite@hotmail.com](mailto:bwootenwhite@hotmail.com)  
**Subject:** Bungee America - Opposition Letter

**CAUTION: External Email. Proceed Responsibly.**

Good afternoon -

Attached you will find my letter stating my opposition to the illegal and ecologically damaging activities of Bungee America. I have also shared this matter with my fellow members of the Pasadena Casting Club, who share my concern for the treatment of our public lands and the negative effects these activities have on our wildlife, game species, and other land users.

Respectfully,

Ross Thomas

**From:** [Edward Rojas](#)  
**To:** [Richard Claghorn](#)  
**Subject:** FW: Comments on Illegal Bungee America Operation  
**Date:** Wednesday, February 16, 2022 1:50:22 PM

---

Another comment for your project

**Edward Rojas, AICP** | Supervising Regional Planner  
Operations and Major Projects

---

**From:** DRP Info <[info@planning.lacounty.gov](mailto:info@planning.lacounty.gov)>  
**Sent:** Wednesday, February 16, 2022 1:49 PM  
**To:** Edward Rojas <[erojas@planning.lacounty.gov](mailto:erojas@planning.lacounty.gov)>  
**Subject:** FW: Comments on Illegal Bungee America Operation

---

**From:** Barry Sohl <[barrysohl@gmail.com](mailto:barrysohl@gmail.com)>  
**Sent:** Tuesday, February 15, 2022 10:16 PM  
**To:** DRP Info <[info@planning.lacounty.gov](mailto:info@planning.lacounty.gov)>  
**Cc:** [bwootenwhite@hotmail.com](mailto:bwootenwhite@hotmail.com)  
**Subject:** Comments on Illegal Bungee America Operation

---

**CAUTION: External Email. Proceed Responsibly.**

County of Los Angeles Department of Regional Planning  
320 W Temple St  
Los Angeles CA 90012  
Em: [info@planning.lacounty.gov](mailto:info@planning.lacounty.gov)

To Whom It May Concern:

As a resident of Orange County, I am expressing by ongoing concern about the illegal bungee jumping operations of Bungee America at the Bridge to Nowhere.

1. Bungee America customers fill the entire public parking lot intended for hiker use at the Bridge to Nowhere trailhead. Hikers are often forced to park far away from the parking lot, sometimes in illegal or dangerous locations along the road.
2. Bungee America customers have a detrimental impact on the wilderness area and outdoor experience. I have personally been stuck behind the Bungee group while hiking, unable to pass them. I watched as members of the large group carelessly tossed water bottles and other trash on the ground while continuously walking off-trail mangling the surrounding vegetation.
3. Hikers are required to have a wilderness permit to enter the Sheep Mountain Wilderness, yet Bungee America customers walk approximately 3 miles through the wilderness area without a permit. And it is my understanding that the owner of Bungee America has not obtained the necessary Guide permit required for commercial travel through the wilderness.

As a resident, I strongly urge the Department to step in and stop the illegal operations of Bungee America. This illegal use has been going on for years without action. I had hoped that the formation of the National Monument would finally put an end to the illegal practices, but it has not. It is time to finally take action and return the wilderness area to its intended use.

Sincerely,  
Barry Sohl

203 Frankfort Avenue  
Huntington Beach, CA 92648  
(714)742-7645

**From:** [DRP Info](#)  
**To:** [Richard Claghorn](#)  
**Cc:** [DRP CP North County](#)  
**Subject:** FW: Comments on Illegal Bungee America Operation  
**Date:** Thursday, February 17, 2022 5:25:03 PM

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Hi Richard,

I think this is your case.

Jolee

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**From:** Amelia V. Borja <milliehv@gmail.com>  
**Sent:** Thursday, February 17, 2022 10:49 AM  
**To:** DRP Info <info@planning.lacounty.gov>; Barger, Kathryn <Kathryn@bos.lacounty.gov>  
**Cc:** bwootenwhite@hotmail.com  
**Subject:** Comments on Illegal Bungee America Operation

**CAUTION: External Email. Proceed Responsibly.**

2/17/2022

To Whom It May Concern:

As a resident of Azusa, California I am expressing my opposition to the illegal bungee jumping operations of Bungee America at the Bridge to Nowhere.

The East Fork region of the San Gabriel River was designated as Wild and Heritage Trout Waters by the California Fish and Game Commission. The designation guarantees public access rights to the rivers and canyons above and below the bridge. Despite that, Bungee America has placed trespass warning signs intended to keep the public out. In doing so Bungee America has also defied the California Fish and Game Commission in addition to Federal regulations. In addition to denying public access to this outdoor space, Bungee America creates crowds of traffic, taking over the publicly owned parking lot at the end of East Fork road and making it impossible for members of the public to use the area for its intended purpose. Bungee jumpers detract and disrupt the outdoor experience and wilderness experience.

As a resident, volunteer and member of the outdoor community I strongly urge the Department to step in and stop the illegal operations of Bungee America.

Sincerely,

Amelia Borja  
121 West 9<sup>th</sup> street, Azusa CA  
91702

## Richard Claghorn

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**From:** Steve Anderson <sandersonimagery@outlook.com>  
**Sent:** Monday, August 19, 2024 3:00 PM  
**To:** Richard Claghorn  
**Subject:** Project 2018-003069

**CAUTION:** External Email. Proceed Responsibly.

Dear Mr. Claghorn,

I'm writing you to express my concerns about the Conditional Use Permit sought by Bungee America (BA).

I don't think this kind of business (i.e. amusement park) should even be allowed in the Sheep Mountain Wilderness. Although it is currently on a parcel of private land, I still do not think it is compatible with the qualities of what defines a Wilderness.

For several decades I hiked in the East Fork river canyon, enjoying the quiet and solitude of our beautiful San Gabriel mountains. When BA moved in with their business much change occurred to the detriment of the canyon and the experience. There was a noticeable increase in the amount of trash, human waste, trail wear, decreased water quality, and especially traffic on the road to the trailhead (there is also a serious lack of parking). Although this area has in general experienced an increase in the above, without the attraction of jumping off the "The Bridge to Nowhere", it would not be as severe as it is now.

In conclusion I just want to say that regardless of the fact that BA is on a chunk of private land, I strongly oppose the issuance of a special permit for them to operate in the middle of what has been deemed worthy of Wilderness status.

Thanks for your time.

Steve Anderson  
Fountain Valley, CA

February 7, 2024

VIA ELECTRONIC MAIL

Ron Jones  
Bungee America, LLC  
16654 Soledad Canyon Road, Ste 464  
Canyon Country, CA 91387

Dear Mr. Jones:

**BUNGEE AMERICA CLEAN HANDS WAIVER EXTENSION  
RFS NO: 14-0002827**

I am in receipt of your request received on January 24, 2024, to extend the term of the Clean Hands Waiver (Waiver) for an additional period of one year to allow for the continued processing of Conditional Use Permit (CUP) No. RPPL2018004676. I previously granted a Waiver of County Code Section 22.02.070 (previously County Code Section 22.04.110) to operate a bungee jumping facility (Bungee America) with associated camping, heliport, and use of five storage containers, while a CUP, Parking Variance, Aviation Permit, or any other required land use permit (collectively known as Application) is filed and processed.

**Background**

The initial Waiver was set to expire on March 31, 2019, and on April 8, 2019, the Department of Regional Planning (DRP) granted a six-month extension of the expiration date to October 8, 2019, provided you met three requirements, which you met. On November 13, 2019, DRP granted an additional six-month extension of the expiration date to April 9, 2020, provided you met two requirements, which you subsequently met. On June 9, 2020, DRP granted an additional six-month extension of the expiration date to November 11, 2020, provided you met three requirements, which you met. On February 3, 2021, DRP granted a one-year extension to expire on February 4, 2022. On February 3, 2022, DRP granted a one-year extension with an expiration date of February 3, 2023, provided you met two requirements, which you met. On February 2, 2023, DRP granted a one-year extension with an expiration date of February 1, 2024, provided you met one requirement, which you met.

You indicate that you have been in communication with the Fire Department and the Departments of Public Health (DPH) and Public Works (DPW), and that you have submitted all information requested by staff but are still waiting for clearance letters from DPH and DPW. Furthermore, you indicate that there have been no changes or expansions to the facilities operating on the subject property.

**Department Determination**

Given the circumstances that are beyond your control and your continued communication with DPH and DPW to address their requests, I will extend the term of the Waiver to allow the continued operation of Bungee America with associated camping, heliport, and use of five storage containers, while the application is processed.

The expiration date of the initial Waiver granted on July 3, 2018, is hereby modified, and now expires on **February 1, 2025**. All terms of the original Waiver, including amendments, remain in full force and effect. Copies of previous Waivers are attached for your reference. While the extension is in effect, your client or any person is prohibited from expanding, enlarging, or adding additional uses, activities, or structures.

Failure to comply with the terms of the Waiver shall be grounds for revocation of the Waiver. Revocation is at the sole discretion of the Director of LA County Planning, and it is not subject to appeal.

If you have any questions regarding the Application, please contact Mr. Samuel Dea at (213) 974-6443 or via email at [sdea@planning.lacounty.gov](mailto:sdea@planning.lacounty.gov). If you have questions regarding the Waiver, please contact Mr. Oscar A. Gomez at (213) 974-6483 or via email at [ogomez@planning.lacounty.gov](mailto:ogomez@planning.lacounty.gov).

Sincerely,



AMY J. BODEK, AICP  
Director of Regional Planning

AJB:DS:AG:OAG:rm

Attachment

c: Supervisor Kathryn Barger (A. Saraiya)  
Regional Planning (M. Glaser, S. Dea, R. Claghorn, O. Gomez, R. Meza)  
Cynthia Morgan Reed

S\_02\_07\_2024\_LUR\_L\_ROM\_JONES



# Federal Aviation Administration

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## Memorandum

Date: April 15, 2020

To: Mark Steinbicker, Manager, Flight Technologies and Procedures Division  
ATTN: Richard Armstrong

**KEITH A  
FRABLE**

Digitally signed by KEITH A  
FRABLE  
Date: 2020.04.16 12:59:42  
-07'00'

From: Keith A. Frable, Manager, Riverside Flight Standards District Office

Prepared by: Roy R. Peters, Principal Operations Inspector, (951) 276-6701x329

Subject: Heliport Evaluation Request, Azusa, CA (AWP-2020-1191-NRA)

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The attached proposal for the Bridge To Nowhere (BTNW) PPR Heliport, Azusa, CA was reviewed by Inspector Peters and is returned as requested. This office has no objection with one provision.

This is a proposed private day use heliport. This office recommends the following condition should be met prior to approval: Ensure unauthorized persons are restrained from access to the takeoff/landing area during helicopter flight operations by use of a non-obstructing safety barrier.

An evaluation of the proposed heliport located near the BTNW, Azusa, California, Case Number AWP-2020-1191-NRA, was conducted in accordance with FAA Order 8900.1, Volume 8, Chapter 3, Section 3. The completed Heliport Evaluations Checklist is attached along with the original case data sent to this office.

2 Attachments

## On-Site Heliport Evaluations Checklist Job Aid – AWP220

*NOTE:* Use this checklist to complete and confirm correct data on the FAA Form 7480-1.

Name of Proponent:	Ron Jones	Site ID (if known):	BTNW PPR Heliport (80756)
NRA Tracking #:	AWP-2020-1191-NRA	Date of Inspection:	04/13/2020

<b>1. Heliport Design</b>	
A. Duration of Use: <input checked="" type="checkbox"/> Permanent <input type="checkbox"/> Temporary	
B. <input checked="" type="checkbox"/> Ground Level Heliport <input type="checkbox"/> Water Heliport <input type="checkbox"/> Ship/Barge Heliport <input type="checkbox"/> Elevated Heliport	
C. Design helicopter to use the heliport:	Robinson R-44

<b>2. Proponent Contact Information</b>			
A. Name:		Ron Jones	
B. Address:		16654 Soledad Canyon Road #464, Canyon Country, CA 91387	
C. Telephone #:		(310) 923-6306	Fax #: (310) 322-8892
D. Email Address:		gjones827@gmail.com	

<b>3. Location of Heliport – Use GPS to confirm the lat/long/elevation during on-site inspection.</b>			
A. Street Address		Bridge to Nowhere, San Gabriel Mountains	
B. City		Azusa	State: CA
C. Latitude:	34 ° 16 ' 55.00 " N	Longitude:	117 ° 44 ' 59.00 " W
D. Elevation:	2810 ft		

<b>4. Type of Use:</b>	
A. <input type="checkbox"/> Public Use <input checked="" type="checkbox"/> Private (PPR) <input type="checkbox"/> Private Use of Public Land/Waters	
B. <input checked="" type="checkbox"/> General Aviation Heliport <input type="checkbox"/> Transport Heliport <input type="checkbox"/> Hospital Heliport	
C. <input checked="" type="checkbox"/> VFR Use <input type="checkbox"/> IFR Use (Identify Approach) :	
D. <input checked="" type="checkbox"/> Day <input checked="" type="checkbox"/> Night	

<b>5. Dimensions of Surfaces – Confirm during on-site inspection – All measurements in feet</b>					
A. Touchdown and Liftoff Area		Length:	46 ft	Width:	46 ft
B. Final Approach & T.O. Area		Length:	85 ft	Width:	85 ft

C. Safety Area	Length:	15.5 ft	Width:	15.5 ft
D. Notes: Heliport is a circular design.				

6. Suitability of Approach/Takeoff Paths	
Note: Confirm that the 8:1 slope (7.125°) is satisfactory from the forward edge of the FATO to 4000 feet. All headings should be magnetic headings from the landing area using the center of the TLOF as the reference point.	
A. Prevailing winds?	Southwest
B. Satisfactory Ingress/Egress may be accomplished from all directions:	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
C. Satisfactory only in the following area:	SEE° to NOTES°
D. Additional satisfactory area or route:	N/A° to N/A°
E. No suitable ingress/egress routes exist under the present conditions	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
F. No other ingress/egress routes should be used	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Notes/Comments: Surveyed proponent's proposed ingress/egress routes (035/215 degrees MAG and 090/270 degrees MAG). Proposed routes SATISFACTORY.	

7. Landing Area Data – Note during on-site inspection	
A. Type of surface:	<input checked="" type="checkbox"/> Concrete <input type="checkbox"/> Asphalt <input type="checkbox"/> Metal <input type="checkbox"/> Water <input type="checkbox"/> Wood <input type="checkbox"/> Other
B. Weight Limit:	12000 lbs.
C. Approved Heliport Markings:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
D. Approved Heliport Lighting:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
E. Night Vision Goggle Ops Planned?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unknown
Notes/Comments: None.	

8. Other Heliport Data – Note during on-site inspection	
A. Heliport Beacon:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required
B. Communication Plan:	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
C. Does the Heliport have fire protection?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required
D. Describe the kind of fire protection (note if NFPA 418 approved): Portable fire extinguisher (Rating 20-A: 120-BC per combined NFPA 418 and California Fire Code Standards).	
E. Does the heliport have a wind direction indicator?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
F. Description (lit, location, visible from TLOF and 500 ft distance on final approach, etc.)  One 12 ft tall windcone. Windcone externally lit with red obstruction light and 4 floodlights (FEC Helioprts Model HP 0907-LED). Measured from TLOF, windcone is at 330 degrees (MAG) approximately 146 ft.	

9. Heliport Vicinity Data	
A. List any other landing areas within 5 nm of the site (Name, location ID, type (airport, heliport, seaplane), direction, and distance from the site: Brackett Field (KPOC) 4.75 NM 151 degrees (MAG).	
B. List any obstructions in the vicinity of the approach/departure protection area. Include recommended mitigation for obstructions that penetrate the 8:1, such as limited ingress/egress routes to avoid, removal, lowering, lighting, or marking the obstacle, etc. Two power poles penetrate Outbound Course 1 (departure heading 035 degrees MAG) transition area. Pole 1 is 033 degrees MAG, 734 ft from FATO. Power pole 2 is 011 degrees MAG, 841 ft from FATO. Both power poles penetrate the same side of the transition area. According to builder's plans, transitional surface penetrations to be marked with red obstruction lights. During the site survey, Los County Department of Public Works Dam Supervisor Stan Brown stated that all power poles in the vicinity of the heliport are to be removed and wires buried.	
List possible noise sensitive areas in the vicinity and direction/distance from site, such as schools, public areas, wildlife, etc. Residential neighborhood 222 degrees (MAG) 1.53 nm.	

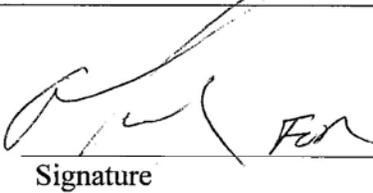
10. State and Local Requirements	
A. Proponent informed to verify building permit and zoning rules met:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
B. Proponent informed to contact state aviation authorities:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
C. Proponent notified to address any environmental requirements?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

11. Does the heliport meet AC 150/5390-2B design criteria for:		
A. TLOF	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Reason:
B. FATO	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Reason:
C. Safety Area	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Reason:
D. VFR App/Dep Paths	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Reason:
E. MRI	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	Reason:
F. Wind Direction	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Reason:
G. Taxiways	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	Reason:
H. Helicopter Parking	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	Reason:
I. Markings	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Reason:
J. Lighting	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Reason:
K. Obstructions	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Reason:
L. Safety Enhancements	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	Reason:
M. Zoning/Land Use	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	Reason:

12. Conclusion	
A. In your opinion, can helicopter operations be conducted safely at the proposed site?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> Provisionally <input type="checkbox"/> No
B. List provisions for safe helicopter operations: None.	

C. List recommendations for safe helicopter operations: (1) Remove power poles in the immediate vicinity of the heliport and place the power lines underground; (2) A representative of Flight Standards Service (AFS) evaluates the heliport for compliance prior to operational use; (3) Ensure unauthorized persons are restrained from access to the takeoff/landing area during helicopter flight operations by use of a non-obstructing safety barrier. The proposed heliport sits next to a road.

Roy R. Peters



~~11/22/2017~~ *GR*

4/16/2020

Inspector Name

Signature

Date

**State of California**  
**Department of Industrial Relations - Division of Occupational Safety and Health**  
**Amusement Ride and Tramway Unit**  
**Permanent Amusement Ride Program**



Northern District Office

Southern District Office

**Certificate of Inspection**

Date 11/26/2023

Division QSI Inspection: Certificate Fee Included

**Bungee America**

**(310)322-8892**

Owner's Name	Owner's Phone
<b>16654 Soledad Canyon Rd, Ste 464</b>	<b>Canyon Country CA 91387</b>

Owner's Address	City	State	Zip
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**Bridge to Nowhere**

Operator's Name if different from above	Operator's Phone
<b>Camp Bonita and East Fork Road</b>	<b>San Gabriel Canyon CA 91702</b>

Operator's Address	City	State	Zip
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**Camp Bonita and East Fork Road, San Gabriel Canyon, CA, 91702**

Location of Ride (Address)

Location (Cont.)	City	State	Zip
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*R Jones*  
 Signature (Owner, Operator or Responsible Party)

**Ron Jones**  
 Printed Name

*Dec 10, 2023*  
 Date

The Division's Qualified Safety Inspector listed below has completed a comprehensive QSI inspection of the safety-related systems and structural attributes of the ride(s) listed on the reverse of this form. No deficiencies were noted and the listed ride(s) were found to be in conformance with the requirements of Sub-chapter 6.2 of Chapter 4, Division 1, (starting at section 3195.1) of Title 8. The following individuals with QSI certification numbers listed (if applicable), assisted with the completion of the ride inspection.

**Kelley Roberts**

Digitally signed by Kelley Roberts  
 Date: 2023.12.07 14:51:38 -08'00'

**R5476**

**10/07/2025**

Division QSI Inspector Signature

QSI Number

Expiration Date





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December 23, 2024

Via E-mail: Mitch Glaser; mglaser@planning.lacounty.gov

Supervisor Katheryn Barger,  
Chair, Los Angeles County Board of Supervisors  
500 West Temple Street  
Los Angeles, CA 90012

**RE: BUNGEE AMERICA’S RESPONSE TO SEPTEMBER 25, 2024 TSAI APPEAL OF PROJECT NO. 2018-003069-(5), CONDITIONAL USE PERMIT NO. RPPL2018004676, VARIANCE NO. RPPL2018004861 (“PROJECT”)**

Dear Hon. Chair Barger and Regional Board of Supervisors,

This letter addresses the September 25, 2024 appeal of the Project by Mitchell M. Tsai. Mr. Tsai alleges that the Project should not have been approved because it is located in a high fire risk area; the heliport has not been properly approved; the Project is not exempt under the California Environmental Quality Act (“CEQA”); the Project has environmental impacts; and, the parking variance is inappropriate (“Appeal”). See Exhibit A.

This letter refutes the Appeal and explains why the Project is permissible. We urge the Board of Supervisors to reject the Appeal and uphold the Project’s approval.

I. Fire Mitigation Is Not Required

The Appeal seeks to exploit an environmental disaster for its own gain by stating that because the Project was in the path of the Bridge Fire, and is located in a Very High Fire Hazard Severity Zone, the County should not approve it or should require an evacuation plan. This objection is not supportable because the County code does not require the Project have an evacuation plan. Furthermore, prior history reflects this is unnecessary. Bungee America was operating a tour with guests at the time the Bridge Fire began. Applicant Mr. Jones employed his own evacuation procedure and all guests and employees were safely evacuated. Furthermore, the Project has implemented its own fire hazard reduction strategies consisting of: i) no greenery near structures; ii)

the exclusive use of noncombustible materials like concrete and steel cargo containers; and, iii) gravel dispersed throughout the base camp area. This strategy is effective. Even though the fire burned through the entire 50-acre site, not a single element of the Project burned during the Bridge fire. Furthermore, Mr. Jones has strong relationships with the U.S. Forest Service, the California Highway Patrol, and local property owners. He is in constant communication with agencies on Red Flag days to ensure his customers, and the business, are safe. His over 35-year track record is a testament as the Project has not had any safety issues or serious injuries due to fire or otherwise.

II. The Heliport's approval is not an issue

The County and Mr. Jones agree that the heliport must be approved. The FAA has previously stated its approval of the heliport. The County's Aeronautical Land Use Commission ("ALUC") has approved the Project for a Minor Aviation Permit. ALUC's approval requires the heliport comply with all County requirements. Mr. Jones and the County have been in regular contact with CALTRANS and the Project will be submitted for CALTRANS approval. CALTRANS has indicated they will approve the state heliport permit. Therefore, the heliport will receive all required approvals.

III. The CEQA Exemptions are Proper

A. Class I: The Use is Not Expanding and Bungee Jumping is an Existing Use

A Class 1 Exemption exempts a project from CEQA when a project is existing and involves negligible or no expansion of the scope of existing or former use. The Appeal alleges that a Class I Exemption is not applicable because the Project is expanding its use. The Appeal focuses on the restroom facilities being built as an expansion in use. However, this argument is inapplicable because "use" does not equate to "building expansion." The Project had an existing restroom prior to the CUP application and seeks a restroom with the CUP approval. This is not an expansion of use. Furthermore, the Project will not expand its use because the County's approval for this exemption is based on limiting the Project's use to a baseline number established during 2013-2015 operations. The County's enforcement of the baseline numbers ensures the Project's use is not expanded beyond the baseline.

The Appeal also claims that Class I is not applicable unless the Project existed before CEQA was enacted in 1970, or it was previously implemented under CEQA. Fortunately, that is not how "existing

use” is analyzed under CEQA Exemption 1. The use must only exist prior to CEQA analysis being performed, not prior to when CEQA was enacted. The court in *Bloom v McGurk (1994) 26 CA4th 1307* held that existing facilities are exempt under this Guideline even though no CEQA review was conducted for prior approvals. In *Bloom*, the court held that an ongoing operation of a medical waste treatment facility subject to permit requirements of a new regulatory scheme imposed by the Medical Waste Management Act, was covered by the existing facilities exemption. The court concluded that the nature of ongoing operations must be determined as of the time of the agency’s action, rather than at the time CEQA was enacted.

#### B. Class 23: The Bridge to Nowhere and Bungee Jumping Are Facilities Used for Public Gatherings

The Class 23 Exemption is for normal operations of existing facilities for public gatherings for which the facilities were designed, when there is a history of the facility’s use for the same or similar purposes. 14 Cal Code Regs §15323. The same or a similar kind of activity must have occurred for at least three years, and there must be a reasonable expectation that the future occurrence of the activity will not represent a change in the operation of the facility. The Bridge to Nowhere is an existing facility and the state-licensed bungee jumping amusement ride has operated there for over thirty-five years. The CUP will bring it in to County compliance and allow the use to legally continue.

The Appeal argues that the Bridge to Nowhere was designed as transportation infrastructure, not as an amusement park. They also argue that the location of the Project is “far from a ‘public gathering facility’ and inherently would not be considered a normal operation for which the facilities were originally designed.” The Appeal disregards how this CEQA exemption applies. CEQA applies to the existing use and the existing use of the bridge is for bungee jumping, which has operated for thirty-five years and is a state licensed amusement ride. The remoteness of the Bridge to Nowhere is not relevant; people gather at the bridge to bungee jump and observe bungee jumping. Therefore, it is a public gathering and exempt.

#### C. Class 3 & 5: If any Exemption Applies, no Exception to an Exemption Applies

It is important to note that the Appeal does not directly attack CEQA Guidelines Sections 15303 Class 3 Exemption for new construction or conversion of small structures. It also does not refute State

CEQA Guidelines Sections 15305 Class 5 Exemption for minor alterations in land use limitations. For CEQA not to apply, the Project only needs to qualify for one CEQA exemption. Fortunately, the Planning Commission unanimously found that all four exemptions apply. Since the Appeal does not raise objections supported with factual evidence to Class 3 or 5 Exemptions, these two exemptions, apply and the Project is exempt from CEQA. To try and make CEQA apply to the Project, the Appeal raises exceptions to the exemptions. A determination that an activity is categorically exempt constitutes an implied finding that none of the exceptions to the exemptions is applicable. *Arcadians for Env't'l Preservation v City of Arcadia* (2023) 88 CA5th 418, 437. Therefore, when an agency finds that a proposed project is subject to a categorical exemption, it is not required to also determine that none of the exceptions applies.

#### IV. CEQA Guidelines Section 15300.2 Exceptions Do Not Apply to the Project.

The CEQA Guidelines allow for exceptions to the categorical exemptions. If an exception applies to the exemption, then CEQA applies and the project is not exempt. The Appeal alleges that two exceptions apply: Location exception to Exemption 3 and 5 and Significant Effect exception to all four exemptions.

##### A. The Location Exception is not Applicable

The Appeal alleges the Location exception applies because the area surrounding the Project site, which is U.S. Forest Service land, is rich with sensitive environmental species and habitat and access to the Project requires the use of these sensitive environmental areas. There are three strong facts however, that make the Location exception inapplicable.

The first is what the Appeal points out; access to the property via the trail is not owned or controlled by the Project. Therefore, the County cannot require an environmental review of property that the Project does not own or control. The second is that the Project's guests use the Project's access the same way as thousands of members of the public; the access is not solely for the Project. Therefore, it would be impossible to distinguish how access for guests creates an effect on the environment separate and apart from the effect by the general public. And third, Exemption 3, new construction or conversion of small structures, and Exemption 5, minor alterations to land use limitations, both

involve changes to the Project site. Since the Appeal only alleges the Location exception applies to areas surrounding the Project site, and not the Project site itself, the exception is not applicable. The County can only regulate the Project site itself.

In addition, the exceptions to Exemptions 3 and 5 do not apply because the Project does not have an impact on an “environmental resource” of “hazardous or critical concern that has been designated, precisely mapped, and officially adopted pursuant to law by federal, state, or local agencies.” 14 Cal Code Regs §15300.2(a). The Location exception applies only if the resource has been so designated, and the absence of any such agency designation, mapping, or adoption precludes application of this exception. *Don't Cell Our Parks v City of San Diego* (2018) 21 CA5th 338, 363. The Project site does not have hazardous or critical environmental resources that have been designated, mapped or officially adopted by an agency. Therefore, the Location exception cannot apply to Exemption 3 or 5.

#### B. The Significant Effect Exception is not Supportable

For the significant effect exception to apply under 14 Cal Code Regs §15300.2(c), an agency must determine if the circumstances are unusual and whether there is a reasonable possibility that the activity will have a significant effect. The Appeal alleges the circumstances are unusual because the recreation is commercial. The significant effect is increasing the number of people who would otherwise use the East Fork Trail, and the business uses a helicopter. This exception applies only when both unusual circumstances, and a significant impact as a result of those unusual circumstances, are shown. *Berkeley Hillside Preservation v City of Berkeley* (2015) 60 C4th 1086, 1104.

Having a commercial recreation activity in a forest area is not unusual and the Appeal presents no evidence to support its argument. There are numerous examples of parks and forests being used for commercial recreational activities like camping, guided hikes, and whitewater rafting. The U.S. Forest Service provides a permit process for recreational companies to use Forest Service land. Just because bungee jumping is a commercial recreational activity does not make it unusual.

Since the Project has commercial recreation, it does not mean, by default, that activity creates a significant effect on the environment. As previously outlined, the Project does not increase the amount of people using the forest; tens of thousands of hikers not associated with the Project use the

trail indistinguishably from the Project's guests. The Appeal also argues that the Project decreases the number of people who can access the trail; which is contrary to claiming increased use. In addition, the Project's reliance on a helicopter does not create a significant effect. The helicopter use is infrequent and thus not significant. The Appeal presents no facts to support its assertions that the Project increases use of the forest service trails or that the helicopter has a significant impact. The Appeal also does not provide any facts to show how any of the Project's four CEQA Exemptions have the potential to create a significant environmental effect. The courts have found it unnecessary to address the unusual circumstances exception when no showing had been made that the project might have a significant environmental impact. *Banker's Hill, Hillcrest, Park W. Community Preservation Group v City of San Diego* (2006) 139 CA4th 249, 261.

#### V. The Project does Not Create Environmental Impacts

The Appeal argues that a full environmental review with an Environmental Impact Report must be drafted because there is substantial evidence in the record to support a fair argument that the Project may have a significant environmental effect. The substantial evidence is that the Project increases trail usage; noise from the helicopter; and construction impacts.

##### A. Trail Usage is not Increased by the Project

The Appeal's argument that the Project increases trail usage and such usage degrades the trail and East Fork river are not supported by any evidence. In fact, the evidence is to the contrary. The opposition has repeatedly argued that the Project takes up all of the available parking at the East Fork trailhead and doesn't allow other trail users to park. If there is competition for parking then there are other users of the trail than just the Project's guests. Furthermore, the Project's guests do not degrade the trail or pollute the area. In fact, it is actually the opposite. The Project's guests are led to the Project on a guided hike. The guides, who know the area very well, ensure that guests stay on the trail, ford the river safely, and pack out what they pack in. In addition, the Project has the only bathrooms in the entire area. Therefore, the Project's guests are not improperly disposing of waste; they are using bathrooms where the waste is contained and properly disposed.

Mr. Jones has repeatedly provided evidence to the County, which was supported by testimony of employees and guests at the September 11, 2024 Project hearing, that he is an excellent steward of the trail and the forest. His employees and volunteers consistently and continuously remove hundreds of pounds of trash yearly from the trail, Project, and surrounding forest. In addition, when areas are affected by natural occurrences such as weather or wildlife, Mr. Jones and his employees act as the eyes and ears for the canyon, calling in issues to the forest service or directly addressing it themselves to ensure hikers' safe passage. For the Appeal to allege that the Project creates a significant environmental impact by misusing the trail is libelous and factually unsupportable.

#### B. Noise from the helicopter is appropriate and infrequent

The Appeal states that the Project's helicopter use must be examined because it creates noise and biological resource impacts. It argues that the helicopter's frequency of use, average noise levels, and potential mitigation must be considered. It also argues that ALUC review of the heliport must examine compatibility of the new heliport with surrounding land uses. The helicopter's use is not at issue because the helicopter has always been used: i) properly in accordance with all laws; ii) to support the Project; and iii) without expansion of use. Therefore, CEQA Exemption 1 applies. However, if examined for CEQA review, the use does not rise to the level of the potential for a significant effect on the environment. The County reviewed the Project's helicopter use and has approved a minor aviation permit for the heliport. Furthermore, the heliport is pre-existing and not treated as new. Therefore, the Appeal is wrong: ALUC does not need to review compatibility with the surrounding land uses.

#### C. New structures will not create the potential for a significant environmental effect

The Appeal argues that replacing the bathroom structure will create biological impacts based on how the materials will be transported to the site and result in runoff. Because the bathroom structure is small, it qualifies for CEQA Exemption 3. The composting toilets are also modular and arrive at the site already constructed. The toilet modulars are specifically made for environmentally sustainable containment and composting of waste in remote locations; negating any potential for leakage or runoff. The bathrooms will not create biological impacts.

## VI. The Parking Variance is Supported by Proper Findings

The Appeal's argument regarding the parking variance is nonsensical. On the one hand it argues that the Project takes all the parking and degrades the trail leading to the Project. It also argues that fewer members of the public can access the trail because the Project takes all the parking. We strongly disagree the Project takes all the parking. The Appeal states "The limited parking available at the trail is insufficient to support both the general public and the patrons of the applicant's business. This added congestion leads to a detrimental decrease in access for members of the public." It is unclear what the Appeal means by "added congestion". Generally, if there are fewer people, the trail would be less degraded. But the reality is that there aren't more or less people: it is likely the same amount of people because there are only so many parking spaces for people to park. If the Appeal was based upon genuine concern for decreasing the number of people using the trail and reducing their effect on the environment, the Appeal would demand reducing parking overall and limiting the number of people allowed. But the Appeal is not arguing for less parking and less people hiking into the wilderness. The Appeal is only arguing who those individuals should be: not the Project's guests. Additionally, any potentially significant environmental effects cannot be distinguished between the public and the Project's guests. So, it is not appropriate to argue, and the Appeal lacks factual evidence to support, that the Project's guests are creating potentially significant effects.

### A. The County has determined a shuttle is not viable.

The Appeal argues that the Board should not accept the parking variance and should require a shuttle option for Project's guests. It states that the County should not have accepted the Project's word that a shuttle was infeasible, but the County should have reviewed and proposed the shuttle as a feasible alternative. The Appeal's arguments fail to understand the Project's approval process. The County did require the Project provide a shuttle study. The County analyzed the study and requested additional information. The County, after numerous discussions and questions, agreed that a shuttle would be infeasible. The County did not blindly accept the Project's studies and conclusions but analyzed the data and reviewed, researched, and ensured that the only viable option was a parking variance. To argue that the County did not properly do its job after such careful consideration is insulting.

We disagree with the categorization that there is a parking problem at all and agree with the County's determination that there are adequate parking facilities at the trailhead to accommodate the Project's use. The parking variance addresses the unique circumstance of the Project's property and properly ameliorates parking and traffic concerns.

## VII. Conclusion

The Appeal's shotgun argument approach reflects a desperate and futile attempt to expose something the County and the Project did wrong. The Appeal is laden with inconsistencies, contradictions and lack of evidence to support its objections. We urge the Board of Supervisors to reject the Appeal and uphold the Project's approval.

Sincerely,

A handwritten signature in cursive script, appearing to read "Cynthia Morgan-Reed".

CYNTHIA MORGAN-REED

Cc: Amy Bodek, AICP, Director of LA County Planning  
Anish Saraiya, Planning and Public Works Deputy to Hon. Kathryn Barger  
Richard Claghorn, Principal Planner

September 11, 2024

Bungee America  
c/o Ron Jones  
16654 Soledad Canyon Road, Suite 464  
Canyon Country, CA 91387

Dear Mr. Jones:

**PROJECT NO. 2018-003069-(5)**  
**CONDITIONAL USE PERMIT NO. RPPL2018004676**  
**VARIANCE NO. RPPL2018004861**  
**(APN: 8678-002-015 & 8678-002-016)**

The Regional Planning Commission, by its action of September 11, 2024, has approved the above-referenced project. Enclosed are the Commission's Findings and Conditions of Approval. This approval is not effective until the appeal period has ended.

The applicant or any other interested persons may appeal the Commission's decision. The appeal period for this project will end at 5:00 p.m. on **September 25, 2024**.

**Appeals:** **To file an appeal, please contact:**  
Executive Office of the Board of Supervisors  
Room 383, Kenneth Hahn Hall of Administration  
500 West Temple Street  
Los Angeles, CA 90012  
(213) 974-1426 or FGaribay@bos.lacounty.gov

Upon completion of the appeal period, the notarized Affidavit of Acceptance and any applicable fees must be submitted to the planner assigned to your case. Please make an appointment to ensure that processing will be completed in a timely manner. Failure to submit these documents and applicable fees within 60 days will result in a referral to Zoning Enforcement for further action.

In addition, any applicable California Environmental Quality Act fees for the Department of Fish and Wildlife shall be paid, and a Notice of Determination, if applicable, must be filed with the County Clerk according to the instructions with the enclosed Affidavit of Acceptance. A Notice of Exemption, if applicable, may also be filed according to the instructions in the enclosed Affidavit of Acceptance.

Mr. Jones  
September 11, 2024  
Page 2

For questions or for additional information, please contact Richard Claghorn of the North County Development Services Section at (213) 893-7015, or [rclaghorn@planning.lacounty.gov](mailto:rclaghorn@planning.lacounty.gov).

Sincerely,

AMY J. BODEK, AICP  
Director of Regional Planning

A handwritten signature in black ink, appearing to read "Samuel Dea".

Samuel Dea, Supervising Regional Planner  
North County Development Services Section

SD:RC

Enclosures: Findings, Conditions of Approval, Affidavit of Acceptance (Permittee's Completion)

**LOS ANGELES COUNTY  
DEPARTMENT OF REGIONAL PLANNING  
FINDINGS OF THE REGIONAL PLANNING COMMISSION  
AND ORDER**

**PROJECT NO. 2018-003069-(5)  
CONDITIONAL USE PERMIT NO. RPPL2018004676  
VARIANCE NO. RPPL2018004861**

**RECITALS**

1. **HEARING DATE(S).** The Los Angeles County (“County”) Regional Planning Commission (“Commission”) conducted a duly-noticed public hearing in the matter of Conditional Use Permit (“CUP”) No. RPPL2018004676 and Variance No. RPPL2018004861 (“Variance”) on September 11, 2024.
2. **HEARING PROCEEDINGS.** A duly-noticed public hearing regarding the CUP and Variance was held before the Commission on September 11, 2024. The project is an amusement ride (bungee jumping), a private heliport, and overnight camping with appurtenant facilities (a container used as a hangar to store a helicopter, two storage containers, a storage building, an office, a security booth, a restroom building with composting toilets, a removable shade canopy, a directional/informational sign, and fencing) (“Project”). The Project is located on Assessor’s Parcel Numbers (“APNs”) 8678-002-015 and 8678-002-016, which is a private inholding with the Angeles National Forest along the East Fork Trail (“Trail”), also known as the Bridge to Nowhere (“Project Site”).

County Department of Regional Planning (“LA County Planning”) Staff (“Staff”) gave a presentation about the Project and recommended approval. Mr. Aaron Clark and Mr. Ron Jones, representing the permittee, Bungee America, Inc. (“Permittee”), gave a presentation about the Project and provided additional information regarding the Permittee’s stewardship of the environment at the Project Site and along the Trail leading to it, including ongoing efforts to remove litter and graffiti and to protect the environment of the area. Mr. Jones also requested modifications to two draft conditions of Project approval. The first request was to modify draft condition of Project approval No. 7 to increase the grant term of the CUP and Variance from 20 years to 30 years. The second request was to modify draft condition of Project approval No. 31 to require composting toilet system inspections every two years, instead of annually, after the inspection that will take place six months after composting toilet system installation, which is required by draft condition of Project approval No. 30.

An additional 26 speakers testified. 25 speakers testified in support, and they spoke about the Project’s benefits. One speaker testified in opposition, and he raised concerns regarding the Permittee’s Variance request and parking issues at the trailhead, potential impacts to the Sheep Mountain Wilderness Area, and the need for an outfitter/guide permit.

The Commissioners asked Staff about Mr. Jones’ request to modify two draft conditions of Project approval. Staff testified that they do not object to the requested

modifications, but if the Commission decided to modify draft condition of Project approval No. 7 to increase the grant term of the CUP and Variance to 30 years, Staff would request that the Commission also modify condition of Project approval No. 9 to provide for additional inspections and a higher deposit into the performance fund to cover the cost of additional inspections over the longer grant term. As a separate matter, Staff also recommended a revised motion that would direct Staff to schedule the Project's private heliport for consideration by the Airport Land Use Commission ("ALUC") in a separate public hearing.

After a brief discussion, a motion was made to close the public hearing and find that the Project is categorically exempt from CEQA. The Commission approved the motion by a vote of 5-0. A second motion was made to approve the CUP and Variance with the requested modification to conditions of Project approval No. 7 and No. 9, resulting in a grant term of 30 years with the commensurate additional inspections and higher deposit, but without the requested modification to condition of Project approval No. 31, resulting in annual composting toilet inspections after the inspection that will take place six months after composting toilet system installation, as originally recommended by Staff. The second motion also directed Staff to schedule the Project's private heliport for consideration by the ALUC in a separate public hearing. The Commission approved the second motion by a vote of 5-0.

3. **ENTITLEMENTS REQUESTED.** The Permittee requests the CUP to authorize the Project in the C-R (Commercial Recreation) Zone pursuant to County Code Section 22.20.030 (Land Use Regulations for Commercial Zones). The Permittee requests the Variance to waive the parking requirements for the Project pursuant to County Code Section 22.194.020 (Variances – Applicability). No changes to the existing facilities are proposed except for a new 160-square-foot restroom building with composting toilets to replace the existing outhouse, a new 80-square-foot security booth, new fencing and a new gate, new signage, and new roofs with solar panels on existing structures. The existing outhouse will be converted into a storage structure. The proposed changes to the facilities are minor in scope and would not create any significant new impacts.
4. **PREVIOUS ENTITLEMENTS.** There are no previous County approvals for the existing amusement ride (bungee jumping) and the existing private heliport. The Permittee established a bungee jumping business on the Project Site in 1989 and has operated the existing private heliport as an accessory land use. Since 1993, the applicant has had permits to operate an amusement ride (bungee jumping) at the Project Site issued by the State of California Department of Industrial Relations' Division of Occupational Safety and Health ("DOSH"). The permits from DOSH are renewed annually. The Federal Aviation Administration ("FAA") issued a memorandum dated April 15, 2020, approving the private heliport. However, the applicant did not obtain County approval for these land uses. Certificate of Compliance No. RPPL2018004675 was recorded on September 9, 2019, to certify the legality of the Project Site parcels and to hold them together as one parcel.

5. **LOCATION.** The Project Site consists of APNs 8678-002-015 and 8678-002-016 and is a private inholding with the Angeles National Forest along the Trail, also known as the Bridge to Nowhere. The Project Site is within the San Gabriel Watershed Zoned District and the Antelope Valley Planning Area.
6. **LAND USE DESIGNATION.** The Project Site is located within the CR (Rural Commercial) land use designation of the Antelope Valley Area Plan (“Area Plan”) Land Use Policy Map, a component of the General Plan.
7. **ZONING.** The Project Site is currently zoned C-R. Pursuant to County Code Section 22.20.030.C (Land Use Regulations for Commercial Zones), a CUP is required for an amusement ride and a private heliport in the C-R Zone and a Ministerial Site Plan Review (“SPR”) is required for a campground in the C-R Zone.

**8. SURROUNDING LAND USES AND ZONING**

LOCATION	ANTELOPE VALLEY AREA PLAN LAND USE POLICY	ZONING	EXISTING USES
NORTH	OS-NF (Open Space – National Forest)	W (Watershed)	National Forest
EAST	OS-NF	W	National Forest
SOUTH	OS-NF	W	National Forest
WEST	OS-NF	W	National Forest

**9. PROJECT AND SITE PLAN DESCRIPTION.**

**A. Existing Site Conditions**

The Project Site is 50 gross acres (50 net acres) in size and is one legal parcel that consists of APNs 8678-002-015 and 8678-002-016. Although the Project Site consists of two APNs, Certificate of Compliance No. RPPL2018004675 was recorded on September 9, 2019, which certified the legality of the Project Site parcels and held them together as one parcel. The Project Site is shaped like two connected rectangles with mountainous topography. The western portion of the Project Site is APN 8678-002-015, which is rectangular in shape, 20 acres in area, and has a width from east to west of 660 feet and a length from north to south of 1,320 feet, an area of 20 acres. The eastern portion of the Project Site is APN 8678-002-016, which is rectangular in shape, 30 acres in area, and has a width from east to west of 660 feet and a length from north to south of 1,980 feet. The eastern portion of the Project Site extends 660 feet further north than the western portion. The Project Site is located entirely within a Very High Fire Hazard Severity Zone. Nearly the entire Project Site is in a Hillside Management Area with natural slopes of 25 percent or greater. The Project Site contains the Bridge to Nowhere, an office, storage containers, a cinder block outhouse, a cargo container used as a helicopter hangar, and a helicopter landing zone.

**B. Site Access**

The Project Site is accessible from the Trail, a horse riding and hiking trail that starts at the end of Camp Bonita Prairie Forks Road, also known as Camp Bonita Road, which is the nearest public road to the Project Site. The Camp Bonita Road public right-of-way is 60 feet wide. The trailhead of the Trail is located at a parking lot on land owned by the United States Forest Service (“USFS”) at the end of Camp Bonita Road.

**C. Site Plan**

The site plan depicts the features of the Project Site. The Trail enters the Project Site on the west side. A new 80-square-foot security booth is proposed near the portion of the Trail located on the property, approximately 80 feet from the western lot line and 420 feet from the southern lot line. A gate is proposed next to the security booth on the Trail to identify the access point to the Project Site.

The Trail continues past the security booth to a helicopter landing zone, which is on a relatively flat area approximately 400 feet northeast of the booth. A private dirt road branches off from the Trail and leads to the helicopter hangar, which is a 320-square-foot cargo container located approximately 400 feet south of the Trail. A proposed 160-square-foot restroom building will be located near the junction of the Trail and the private dirt road. It will contain two composting toilets and will replace the existing outhouse. The composting toilets will compost solid human waste on-site and divert urine to a separate holding tank. Liquid waste will be transported off-site for disposal at an approved disposal facility. The restroom building will replace the existing outhouse, which is an approximately 182-square-foot cinder block structure located near the Trail approximately 210 feet north of the proposed restroom building. The existing outhouse will be converted to a storage building.

The Trail continues in a northeasterly direction from the cinder block storage building to the Bridge to Nowhere, which is located in the northeastern portion of the Project Site. The bridge is approximately 170 feet in length and is approximately 70 feet west of the eastern property line. There is a removable canopy structure on the bridge that is approximately 26 feet by 40 feet. An existing 640-square-foot office building made up of two cargo containers is located west of the bridge. Two existing smaller cargo containers used for storage, with a combined area of 256 square feet, are located southwest of the office and adjoin it. A new non-combustible metal roof is proposed over the office and storage area which will connect the office and storage area and will have solar panels. New non-combustible metal roofs with solar panels are also proposed on the existing container used as a hangar, the proposed restroom building, and the proposed security booth.

**D. Parking**

There is no parking provided on the Project Site since it has no road access to accommodate an automobile. The Permittee requested the Variance to waive the

parking requirements for the Project because it is not possible to provide parking on the Project Site, providing a new off-site parking lot is not feasible because there are no available parking lots nearby for lease, and there is existing parking available at the trailhead for users of the Angeles National Forest. The trailhead parking lot is on land owned by the USFS at the end of Camp Bonita Road. Parking at this lot and along nearby roadways is permitted with a USFS Adventure Pass. The distance from the trailhead of the Trail to the Project Site is approximately five miles.

- 10. CEQA DETERMINATION.** Prior to the Commission's public hearing on the Project, Staff determined that the Project qualified for Class 1 (Existing Facilities), Class 3 (New Construction or Conversion of Small Structures), Class 5 (Minor Alterations in Land Use Limitations), and Class 23 (Normal Operations of Facilities for Public Gatherings) Categorical Exemptions under State CEQA Guidelines Sections 15301, 15303, 15305, and 15323 and the County Environmental Document Reporting Procedures and Guidelines.

This Project will authorize an existing amusement ride (bungee jumping), a private heliport, and overnight camping with appurtenant facilities (a container used as a hangar to store a helicopter, two storage containers, a storage building, an office, a security booth, a restroom building with composting toilets, a removable shade canopy, a directional/informational sign, and fencing). No changes to the existing facilities are proposed except for a new 160-square-foot restroom building with composting toilets to replace the existing outhouse, a new 80-square-foot security booth, new fencing and a new gate, new signage, and new roofs with solar panels on existing structures. The existing outhouse will be converted into a storage structure. The proposed changes to the facilities are minor in scope and would not create any significant new impacts.

No expansion of the number of visitors is proposed, and the number of visitors will remain within the Project baseline that was based on the applicant's guest logs for the time period of 2013 to 2015. The Project will not have a significant effect on the environment. No development is proposed in a Significant Ecological Area or any other designated environmental resource area. The Project does not result in cumulative impacts, is not near a scenic highway, is not included on a list of hazardous waste sites, does not impact historic resources, and does not result in other significant effects on the environment. Therefore, no exceptions to the Categorical Exemptions mentioned above are applicable and the Project can be considered exempt.

- 11. PUBLIC COMMENTS.** Staff received comments from members of the public regarding the Project between 2016 and 2022. These comments opposed the Director of Regional Planning's ("Director's") approval of a Clean Hands Waiver pursuant to County Code Section 22.02.070 (Application Where Violation Exists) and the continued operation of the amusement ride (bungee jumping), private heliport, and appurtenant facilities on the Project Site. These comments raised numerous concerns regarding safety, impacts to the environment, sanitation and waste disposal, parking,

and the use of a helicopter. Staff received another comment in 2024 opposing the Project due to concerns with waste disposal, trash, traffic, parking, and other concerns.

## **12. AGENCY RECOMMENDATIONS.**

- A. The County Department of Public Works recommended clearance to public hearing with no conditions or comments in a letter dated October 2, 2023.
- B. The County Fire Department recommended clearance to public hearing with conditions in a letter dated January 8, 2024. The Fire Department's recommended conditions have been incorporated into the conditions of Project approval.
- C. County Department of Public Health recommended clearance to public hearing with conditions in a letter dated August 22, 2024. The Department of Public Health's recommended conditions have been incorporated into the conditions of Project approval.
- D. DOSH issued a Certificate of Inspection for Bungee America, which functions as an approval, on December 7, 2023. This Certificate of Inspection was issued after DOSH conducted an inspection of safety-related systems and structural attributes of the amusement ride (bungee jumping) on November 26, 2023. During this inspection, DOSH did not note any deficiencies and determined that the ride complied with their requirements. The DOSH approval expires on October 7, 2025. DOSH has issued Certificates of Inspection for the amusement ride (bungee jumping) since 1993 and inspections are conducted and certificates are renewed on an annual basis.
- E. The FAA issued a memorandum dated April 15, 2020, approving the private heliport. The FAA approval includes a condition to use of a non-obstructing safety barrier to ensure that unauthorized persons are restrained from access to the takeoff/landing area during helicopter flight operations. The FAA's condition has been incorporated into the conditions of Project approval.

**13. LEGAL NOTIFICATION.** Pursuant to County Code Section 22.222.120 (Public Hearing Procedure), the community was properly notified of the public hearing by mail, newspaper (*Antelope Valley Press*), and property posting. Additionally, the Project was noticed and case materials were available on LA County Planning's website. On July 24, 2024, a total of three Notices of Public Hearing were mailed to all property owners as identified on the County Assessor's record within a 1,000-foot radius from the Project Site, as well as two notices to those on the courtesy mailing list for the San Gabriel Watershed Zoned District. Notices were also emailed to four persons who had requested email notification.

## **GENERAL PLAN CONSISTENCY FINDINGS**

**14. LAND USE POLICY.** The Commission finds that the Project is consistent with the Area Plan's Land Use Policy Map. The Project Site is in the CR land use designation.

The CR land use designation identifies lands in the planning area that are designated for limited, low-intensity commercial uses that are compatible with rural and agricultural activities. Specific allowable uses are determined by the underlying zoning designation. The C-R Zone allows amusement rides and private heliports with a CUP and allows campgrounds with a Ministerial SPR.

15. **GOALS AND POLICIES.** The Commission finds that the Project is consistent with the goals and policies of the General Plan. The following General Plan policies apply to the Project:

- *General Plan Economic Development Policy ED 1.1:* “Encourage a diverse mix of industries and services in each Planning Area.”

The Project is a unique business that has been providing recreational opportunities for the public for approximately 35 years and its continued operation will contribute to the range of services available in the Antelope Valley Planning Area.

- *General Plan Economic Development Policy ED 1.4:* “Encourage the expansion and retention of targeted industries and other growth economic sectors, such as the entertainment industry, aerospace industry, agriculture, transportation/logistics, healthcare, biomed/biotech, hospitality and tourism.”

The Project is a recreational business that contributes to tourism in the County, an important economic sector. The continued operation of this existing use, which has operated for approximately 35 years, will promote tourism in the County and contribute to economic activity for the Project and at other businesses in the County which support the visitors using the Project.

16. The Commission finds that the Project is consistent with the goals and policies of the Area Plan. The following Area Plan policy applies to the Project:

- *Area Plan Economic Development Policy ED 1.17:* “Promote uses and activities that rely on the natural state of the environment to take advantage of the vast areas of relatively undisturbed natural areas in the Antelope Valley. These include recreational, tourism and film-making uses.”

Bungee America is a small business that has operated on the Project Site for approximately 35 years and is part of the tourism sector, which is an important part of the economy of the County and the Southern California region. The Project promotes activities that rely on the natural environment and contributes to the tourism in the County.

### **ZONING CODE CONSISTENCY FINDINGS**

17. **PERMITTED USE IN ZONE.** The Commission finds that the Project is consistent with the C-R zoning classification because an amusement ride and a private heliport are

permitted in such zone with a CUP and a campground is permitted in such zone with a Ministerial SPR pursuant to County Code Section 22.20.030.C (Land Use Regulations for Commercial Zones).

18. **C-R ZONE DEVELOPMENT STANDARDS.** The Commission finds that the Project complies with the required C-R Zone Development Standards. Pursuant to County Code Section 22.20.040 (Development Standards for Commercial Zones), there are no required yards, no minimum required landscaping area, and no maximum lot coverage in the C-R Zone. The only development standard listed for the C-R Zone is maximum building height, which is 13 times the buildable area. The Project complies with the maximum building height.
19. **SIGNS.** The Commission finds that the existing signage on the Project Site is consistent with County Code requirements. The Project Site is not allowed to have any wall business signs pursuant to County Code Section 22.114.110 (Wall Business Signs) or any roof or freestanding business signs pursuant to County Code Section 22.114.120 (Roof and Freestanding Business Signs) because it does not have any street frontage. However, it is permitted to have directional or informational signs pursuant to County Code Section 22.114.190 (Directional or Informational Signs). Such directional or informational signs may not exceed 24 square feet in sign area or 12 feet in height. The Project Site contains several existing directional or informational signs to identify the property, to warn against hazards, to provide rules to be followed by visitors to the property, to warn against trespassing in restricted areas, and other information for the public. These existing signs qualify as directional or informational signs and comply with the standards for such signs. The proposed sign near the security booth shown on the Exhibit "A" presented at the public hearing is also classified as a freestanding directional or informational sign, as it identifies the Project Site. The proposed sign complies with the applicable signage standards.
20. **PARKING.** The Commission finds that the Project Site does not meet the minimum requirement for on-site parking pursuant to County Code Section 22.112.070 (Required Parking Spaces). However, a Variance to waive the parking requirement for the Project is justified because of the apparent unique circumstances and physical characteristics of the Project Site pursuant to County Code Section 22.194.050 (Variance Findings).

The Project Site is approximately five miles from the nearest public road, which is Camp Bonita Road. There is a parking lot at the trailhead of the Trail available to hikers of the Trail, which leads from the trailhead to the Project Site. The parking lot at the trailhead at the end of Camp Bonita Road has 33 parking spaces and is on land owned by the USFS. This parking lot is available to hikers of the Trail, which is on USFS land, except for the portion traversing the Project Site, which is owned by the Permittee. There are also additional parking spaces along Camp Bonita Road and other nearby roadways such as East Fork Road and Glendora Mountain Road. Vehicles using the parking lot and the parking areas along the side of Camp Bonita Road are required to display a USFS Adventure Pass. The Permittee is an authorized vendor of Adventure Passes on behalf of the USFS and has been for decades.

There is no parking requirement specified for amusement rides in County Code Section 22.112.070 (Required Parking Spaces). County Code Section 22.112.070 (Required Parking Spaces – Uses Not Specified) states, “Where parking requirements for any use are not specified, parking shall be provided in an amount that the Director finds adequate to prevent traffic congestion and excessive on-street parking. Whenever practical, such determination shall be based upon the requirements for the most comparable use specified in this Chapter (County Code Chapter 22.12 (Parking).” Pursuant to County Code Section 22.112.070 (Required Parking Spaces), the parking requirement for places of amusement and entertainment, the most comparable listed land use, is based on a ratio of one parking space per three persons based on the occupant load of all indoor and outdoor areas, with a minimum of 10 spaces for each land use. There is no occupant load for this land use, but the average number of guests per day was used as a substitute to estimate the demand for parking.

The number of Bungee America guests averaged 7,701 per year during the years of 2013 to 2015. During this time period, there were 358 days when the Permittee held bungee jumping tours, with an average of 119 days per year with at least one tour. The average number of guests per day during the years of 2013 to 2015 was 65. The maximum number of guests in one day during the years of 2013 to 2015 was 177 and the highest number on a single tour was 144. The total number of days during the years of 2013 to 2015 with at least 100 guests was 58, while there were only five days during the same period with at least 150 guests.

Based on the average number of guests in a single day of 65 and a ratio of one space per three guests, a minimum of 22 parking spaces would be required. The Commission finds that a Variance to waive the parking requirement for the Project is justified pursuant to County Code Section 22.194.050 (Variance Findings), as explained further in Findings 25 through 28, below, because it is not possible to provide parking spaces on the Project Site, because there is a lack of alternative parking locations, and because the parking areas at the trailhead have been adequate to serve this use in the past.

The conditions of Project approval set limits on the maximum number of guests on a single tour, a single day, a single month, and a single calendar year. The conditions of Project approval also set limits on the number of overnight camping nights that may be conducted during a year, the number of guests allowed per camping night, and the number of camping guests per year. These limits are based on the data provided by the Permittee related to guests during the years of 2013 to 2015, which also established the baseline for the Project’s environmental analysis, as explained in Finding 10, above, and Finding 30, below. The conditions of Project approval require the Permittee to maintain logs related to all of these limits and to provide them to Staff to ensure compliance with these limits.

Another condition of Project approval requires the Permittee to encourage guests to carpool or rideshare to the trailhead to minimize the number of cars parked in the vicinity of the trailhead. It also requires that the Permittee’s website and any other

promotional materials related to the Project to include a statement that encourages guests to carpool or rideshare to the trailhead.

21. **INCLUSIONARY UNITS.** The Commission finds that the Project is exempt from the Inclusionary Zoning Ordinance because the Project does not include any housing component.

### **CONDITIONAL USE PERMIT AND VARIANCE FINDINGS**

22. **The Commission finds that the proposed use at the site will not adversely affect the health, peace, comfort, or welfare of persons residing or working in the surrounding area; will not be materially detrimental to the use, enjoyment, or valuation of property of other persons located in the vicinity of the site; and will not jeopardize, endanger, or otherwise constitute a menace to the public health, safety, or general welfare.** The Project Site is in a very remote location, with no residences or places of employment for miles in all directions. Bungee America has an excellent safety record and has not had any known safety incidents since it began operating in 1989. Annual safety inspections are performed by DOSH to ensure that the land use remains safe. Bungee America staff regularly picks up trash along the trail to the Project Site and sponsors trail clean-up events. The Permittee has emergency communications equipment at the Project Site, which provides the ability to communicate in emergency situations in an area otherwise lacking in communication services due to the remote location. The private heliport on the Project Site was approved by the FAA. The helicopter is operated in compliance with FAA requirements and is needed for logistical support required by the Project Site's remoted location, including transport of waste and supplies. The helicopter is not used to transport guests. Helicopter flights are relatively infrequent.
23. **The Commission finds that the proposed site is adequate in size and shape to accommodate the yards, walls, fences, parking and loading facilities, landscaping and other development features prescribed in Title 22, or as is otherwise required in order to integrate said use with the uses in the surrounding area.** The Project Site has an area of 50 acres and there is ample space for all required development features. However, there is no parking provided on the Project Site due to the fact it is located five miles from the nearest public road and is inaccessible by automobiles. The Variance waived the parking requirements for the Project pursuant to Findings 25 through 28, below.
24. **The Commission finds that the proposed site is adequately served by highways or streets of sufficient width and improved as necessary to carry the kind and quantity of traffic such use would generate, and by other public or private service facilities as are required.** The Project Site has no direct vehicular access and is approximately five miles from the nearest public road via the Trail. The trailhead is at the end of Camp Bonita Road, which is a 60-foot-wide County-maintained road that is adequate to serve the users of the Trail. There are limited services available at the Project Site. The Permittee operates a satellite phone with Wi-Fi for emergency communications.

There is currently an outhouse on the Project Site that will be replaced by a new restroom building with composting toilets. The composting toilets would allow for the composting of human solid waste on the Project Site while human liquid waste would be transported off the site by a helicopter. This change will reduce the amount of waste and will dispose the waste in a more efficient and environmentally sensitive way. The conditions of Project approval require periodic evaluations of the composting toilet system by a certified industrial hygienist throughout the grant term to ensure that it is functioning correctly to the satisfaction of the Director. If it is not functioning correctly, the conditions of Project approval require that the operation of the Project must cease until necessary repairs or modifications are made, inspected, and approved by a certified industrial hygienist to the satisfaction of the Director. If necessary, the Director will initiate a modification or revocation of the CUP pursuant to County Code Chapter 22.238 (Modifications and Revocations).

An estimated 20,000 public hikers per year use the Trail to access the Bridge to Nowhere in addition to the approximately 8,000 guests per year who participate in bungee jumping. The Permittee will continue to allow hikers of the public trail to access the Bridge to Nowhere on the Project Site although they are not required to do so, which provides a significant benefit to residents of, and visitors to, the County and the Southern California region who want to access the Bridge to Nowhere.

**25. The Commission finds that because of special circumstances or exceptional characteristics applicable to the property, the strict application of the County Code deprives such property of privileges enjoyed by other property in the vicinity and under identical zoning classification.** The Project Site has special circumstances and exceptional characteristics that make a Variance necessary for the Project. The Project Site is located well within the boundary of the Angeles National Forest, has no means of vehicular access, and can only be reached using a hiking trail that is approximately five miles in length from the trailhead and Camp Bonita Road, which is the nearest public road. Therefore, the Permittee cannot provide parking spaces on the Project Site.

There is a parking lot on USFS land at the trailhead that is available to the public with the purchase of USFS Adventure Passes from authorized vendors. The Permittee is an authorized vendor of USFS Adventure Passes. Additional parking spaces along Camp Bonita Road are available if all spaces in the parking lot are occupied. USFS Adventure Passes are also required for parking along designated portions of Camp Bonita Road, which is also within USFS land. Although the parking lot and the parking spaces along designated portions of Camp Bonita Road are a five-mile hike in each direction from the Project Site, the Bungee America guests who choose to visit the Project Site do so with the expectation of a long hike to and from the Project Site and the long hike is an important part of the recreational aspect of the experience and a key component of the Project.

There are no other properties with similar zoning for miles in all directions. There are no other known sites in the County which have similar circumstances to the Project Site.

**26. The Commission finds that the modification authorized will not constitute a grant of special privilege inconsistent with the limitations upon other properties in the vicinity and zone in which the property is situated.** There are no other properties in the vicinity with the same or similar zoning and no other private inholdings nearby. The Project Site is surrounded by USFS land for miles in all directions and has unique circumstances and characteristics that are not found elsewhere in the vicinity. There are no other known land uses in the County with similar circumstances and in a similarly remote location with no vehicular access for miles in all directions.

**27. The Commission finds that strict application of zoning regulations as they apply to such property will result in practical difficulties or unnecessary hardships inconsistent with the general purpose of such regulations and standards.** The Permittee explored alternatives to using the parking lot on USFS land at the trailhead and the parking spaces along designated portions of Camp Bonita Road but none of them were proven feasible. The Permittee contacted the owners of six properties on East Fork Road, the nearest road to Camp Bonita Road, regarding the possibility of providing off-site parking spaces for the Project. However, these locations had no available parking spaces, were not properly zoned for commercial parking, or the owners of these locations were not interested in selling or leasing any areas for parking. The Permittee also explored the possibility of operating a shuttle to provide transportation for guests. However, the shuttle option was found to be infeasible because of the excessive time that would be necessary for guests to wait for the shuttles. Therefore, continuing the current parking arrangement, which includes the parking lot on USFS land at the trailhead and the parking spaces along designated portions of Camp Bonita Road, is the only viable option to provide parking for the Project and ensure its continued operation.

Strict application of the parking requirements for the Project is not possible due to its remote location and physical constraints and would result in practical difficulties or unnecessary hardships inconsistent with the purpose of such standards. There are no feasible alternatives. The Project would be severely impacted because it cannot continue operating without relief from the parking requirements.

**28. The Commission finds that such adjustment will not be materially detrimental to the public health, safety, or general welfare, or to the use, enjoyment, or valuation of property of other persons located in the vicinity.** Bungee America guests have used the parking lot on USFS land at the trailhead and the parking spaces along designated portions of Camp Bonita Road since 1989, and the amount of parking available there has been sufficient to accommodate the Bungee America guests and other users of the Trail. The conditions of project approval will limit the number of guests for Bungee America to avoid an increase above the baseline levels established during the years of 2013 to 2015. The Permittee's website and any other promotional

materials related to the Project must include a statement that encourages guests to carpool or rideshare to the trailhead.

The surrounding properties within a wide radius of the Project Site and the Trail leading to it are on USFS land. The Project will continue operating in largely the same manner as it has for the past approximately 35 years, which would not be detrimental to the use, enjoyment or valuation of other properties or persons in the area. Visitors to the Project Site will be encouraged to carpool to minimize the parking demands at the parking lot on USFS land at the trailhead and the parking spaces along designated portions of Camp Bonita Road. The parking lot on USFS land at the trailhead and the parking spaces along designated portions of Camp Bonita Road will continue to be available to other visitors to the Angeles National Forest and all users of the parking lot and the parking spaces, including visitors to the Project Site, are required to display a USFS Adventure Pass purchased from the USFS or an authorized vendor.

29. The Commission finds that to ensure continued compatibility between the Project and the surrounding land uses, it is necessary to limit the CUP and Variance to a grant term of 30 years.

### **ENVIRONMENTAL FINDINGS**

30. The Commission finds that the Project is exempt from the California Environmental Quality Act pursuant to State CEQA Guidelines sections 15301 (Class 1, Existing Facilities categorical exemption), 15303 (Class 3, New Construction or Conversion of Small Structures categorical exemption), Class 5 (Minor Alterations in Land Use Limitations categorical exemption), and Class 23 (Normal Operations of Facilities for Public Gatherings categorical exemption) and the County Environmental Document Reporting Procedures and Guidelines.

This Project will authorize an existing amusement ride (bungee jumping), a private heliport, and overnight camping with appurtenant facilities (a container used as a hangar to store a helicopter, two storage containers, a storage building, an office, a security booth, a restroom building with composting toilets, a removable shade canopy, a directional/informational sign, and fencing). No changes to the existing facilities are proposed except for a new 160-square-foot restroom building with composting toilets to replace the existing outhouse, a new 80-square-foot security booth, new fencing and a new gate, new signage, and new roofs with solar panels on existing structures. The existing outhouse will be converted into a storage structure. The proposed changes to the facilities are minor in scope and would not create any significant new impacts.

No expansion of the number of visitors is proposed, and the number of visitors will remain within the Project baseline that was based on the applicant's guest logs for the time period of 2013 to 2015. The Project will not have a significant effect on the environment. No development is proposed in a Significant Ecological Area or any other designated environmental resource area. The Project does not result in cumulative impacts, is not near a scenic highway, is not included on a list of hazardous waste sites, does not impact historic resources, and does not result in other significant

effects on the environment. Therefore, the Commission finds that no exceptions to the Categorical Exemptions mentioned above are applicable and the Project is considered exempt.

### **ADMINISTRATIVE FINDINGS**

**31. LOCATION OF DOCUMENTS.** The location of the documents and other materials constituting the record of proceedings upon which the Commission's decision is based in this matter is at LA County Planning, 13th Floor, Hall of Records, 320 West Temple Street, Los Angeles, California 90012. The custodian of such documents and materials shall be the Section Head of the North County Development Services Section, LA County Planning.

### **BASED ON THE FOREGOING, THE COMMISSION CONCLUDES THAT:**

- A. The proposed use, with the conditions of Project approval, will be consistent with the adopted General Plan and Area Plan.
- B. The proposed use at the site will not adversely affect the health, peace, comfort or welfare of persons residing or working in the surrounding area, will not be materially detrimental to the use, enjoyment or valuation of property of other persons located in the vicinity of the site, and will not jeopardize, endanger or otherwise constitute a menace to the public health, safety or general welfare.
- C. The proposed site is adequate in size and shape to accommodate the yards, walls, fences, parking and loading facilities, landscaping and other development features prescribed in Title 22, or as is otherwise required in order to integrate said use with the uses in the surrounding area.
- D. The proposed site is adequately served by highways or streets of sufficient width and improved as necessary to carry the kind and quantity of traffic such use would generate, and by other public or private service facilities as are required.
- E. Because of special circumstances or exceptional characteristics applicable to the property, the strict application of the County Code deprives such property of privileges enjoyed by other property in the vicinity and under identical zoning classification.
- F. The modification authorized will not constitute a grant of special privilege inconsistent with the limitations upon other properties in the vicinity and zone in which the property is situated.
- G. Strict application of zoning regulations as they apply to such property will result in practical difficulties or unnecessary hardships inconsistent with the general purpose of such regulations and standards.

- H. Such adjustment will not be materially detrimental to the public health, safety, or general welfare, or to the use, enjoyment, or valuation of property of other persons located in the vicinity.

**THEREFORE, THE COMMISSION:**

1. Finds that the Project is exempt from the California Environmental Quality Act pursuant to State CEQA Guidelines sections 15301 (Class 1, Existing Facilities categorical exemption), 15303 (Class 3, New Construction or Conversion of Small Structures categorical exemption), 15305 (Class 5, Minor Alterations in Land Use Limitations categorical exemption), and 15323 (Class 23, Normal Operations of Facilities for Public Gatherings categorical exemption); and
2. Approves **CONDITIONAL USE PERMIT NO. RPPL2018004676** and **VARIANCE NO. RPPL2018004861** subject to the attached conditions.

**ACTION DATE: September 11, 2024**

MG:SZD:RWC

**VOTE: 5:0:0:0**

**Concurring: Hastings, Moon, O'Connor, Louie, Duarte-White**

**Dissenting: 0**

**Abstaining: 0**

**Absent: 0**

LOS ANGELES COUNTY  
DEPARTMENT OF REGIONAL PLANNING

CONDITIONS OF APPROVAL  
PROJECT NO. 2018-003069-(5)  
CONDITIONAL USE PERMIT NO. RPPL2018004676  
VARIANCE NO. RPPL2018004861

**PROJECT DESCRIPTION**

The project consists of a Conditional Use Permit (“CUP”) to authorize an amusement ride (bungee jumping), a private heliport, and overnight camping with appurtenant facilities (a container used as a hangar to store a helicopter, two storage containers, a storage building, an office, a security booth, a restroom building with composting toilets, a removable shade canopy, a directional/informational sign, and fencing) on a private inholding within the Angeles National Forest along the East Fork Trail, also known as the Bridge to Nowhere, in the C-R (Commercial Recreation) Zone (“Project Site”), and a Variance to waive the on-site parking requirements subject to the following conditions of approval:

**GENERAL CONDITIONS**

1. Unless otherwise apparent from the context, the term “Permittee” shall include the applicant, owner of the property, and any other person, corporation, or other entity making use of this grant.
2. This grant shall not be effective for any purpose until the Permittee, and the owner of the subject property if other than the Permittee, have filed at the office of the Los Angeles County ("County") Department of Regional Planning (“LA County Planning”) their affidavit stating that they are aware of and agree to accept all of the conditions of this grant, and that the conditions of the grant have been recorded as required by Condition No. 6, and until all required monies have been paid pursuant to Condition No. 9. Notwithstanding the foregoing, this Condition No. 2 and Condition Nos. 3, 4, and 8 shall be effective immediately upon the date of final approval of this grant by the County.
3. The Permittee shall defend, indemnify, and hold harmless the County, its agents, officers, and employees from any claim, action, or proceeding against the County or its agents, officers, or employees to attack, set aside, void, or annul this permit approval, which action is brought within the applicable time period of Government Code section 65009 or any other applicable limitations period. The County shall promptly notify the Permittee of any claim, action, or proceeding and the County shall reasonably cooperate in the defense. If the County fails to promptly notify the Permittee of any claim, action, or proceeding, or if the County fails to cooperate reasonably in the defense, the Permittee shall not thereafter be responsible to defend, indemnify, or hold harmless the County.
4. In the event that any claim, action, or proceeding as described above is filed against the County, the Permittee shall within ten days of the filing make an initial deposit with LA County Planning in the amount of up to \$5,000.00, from which actual costs and expenses shall be billed and deducted for the purpose of defraying the costs or expenses involved in LA County Planning’s cooperation in the defense, including but

not limited to, depositions, testimony, and other assistance provided to Permittee or Permittee's counsel.

If during the litigation process, actual costs or expenses incurred reach 80 percent of the amount on deposit, the Permittee shall deposit additional funds sufficient to bring the balance up to the amount of \$5,000.00. There is no limit to the number of supplemental deposits that may be required prior to completion of the litigation.

At the sole discretion of the Permittee, the amount of an initial or any supplemental deposit may exceed the minimum amounts defined herein. Additionally, the cost for collection and duplication of records and other related documents shall be paid by the Permittee according to County Code Section 2.170.010.

5. If any material provision of this grant is held or declared to be invalid by a court of competent jurisdiction, the permit shall be void and the privileges granted hereunder shall lapse.
6. Prior to the use of this grant, the Permittee, or the owner of the subject property if other than the Permittee, shall **record the terms and conditions** of the grant in the office of the County Registrar-Recorder/County Clerk (i.e. Recorder's Office). In addition, upon any transfer or lease of the property during the term of this grant, the Permittee, or the owner of the subject property if other than the Permittee, shall promptly provide a copy of the grant and its conditions to the transferee or lessee of the subject property.
7. **This grant shall terminate on September 11, 2054.** Entitlement to use of the property thereafter shall be subject to the regulations then in effect. If the Permittee intends to continue operations after such date, regardless of whether the Permittee proposes any modifications to the use at that time, the Permittee shall file a new CUP and Variance application with LA County Planning or shall otherwise comply with the applicable requirements at that time. Such application shall be filed at least twelve (12) months prior to the expiration date of this grant and shall be accompanied by the required fee. In the event that the Permittee seeks to discontinue or otherwise change the use, notice is hereby given that the use of such property may require additional or different permits and would be subject to the then-applicable regulations.
8. This grant shall expire unless used within ninety (90) days from the date of final approval of the grant (by December 26, 2024). A single thirty (30) day time extension may be requested in writing and with the payment of the applicable fee prior to such expiration date. For the purposes of this provision, the continued operation of the amusement ride (bungee jumping) and/or private heliport on the site and satisfaction of Condition No. 2 shall be considered use of this grant.
9. The subject property shall be maintained and operated in full compliance with the conditions of this grant and any law, statute, ordinance, or other regulation applicable to any development or activity on the subject property. Failure of the Permittee to

cease any development or activity not in full compliance shall be a violation of these conditions. No provision of any easement of any other encumbrance on the property shall exempt the Permittee and/or property owner from compliance with these conditions and applicable regulations.

Inspections shall be made to ensure compliance with the conditions of this grant as well as to ensure that any development undertaken on the subject property is in accordance with the approved site plan on file. Given the remote location of the Project Site, at the request of LA County Planning, the Permittee shall provide transportation to and from the Project Site to assist with the completion of these inspections.

The Permittee shall deposit with the County the sum **\$3,528.00**, which shall be placed in a performance fund and be used exclusively to reimburse LA County Planning for all expenses incurred while inspecting the premises to determine the Permittee's compliance with the conditions of this grant. The fund provides for **eight (8)** inspections. Inspections may be unannounced. Inspections may be conducted utilizing any available technologies, including, but not limited to, unmanned aircraft systems (UAS). Use of an UAS requires the approval of the Permittee pursuant to LA County Planning's UAS Policy, which may be updated from time to time, and which shall be provided to the Permittee upon request.

If additional inspections are required to ensure compliance with the conditions of this grant, or if any inspection discloses that the subject property is being used in violation of any one of the conditions of this grant, the Permittee shall be financially responsible and shall reimburse LA County Planning for all additional enforcement efforts necessary to bring the subject property into compliance. The amount charged for additional inspections shall be \$441.00 per inspection, or the current recovery cost established by LA County Planning at the time any additional inspections are required, whichever is greater.

10. Notice is hereby given that any person violating a provision of this grant is guilty of a misdemeanor. Notice is further given that the Regional Planning Commission ("Commission") or a Hearing Officer may, after conducting a public hearing, revoke or modify this grant, if the Commission or Hearing Officer finds that these conditions have been violated or that this grant has been exercised so as to be detrimental to the public's health or safety or so as to be a nuisance, or as otherwise authorized pursuant to County Code Chapter 22.238.
11. All development pursuant to this grant must be kept in full compliance with the County Fire Code to the satisfaction of the County Fire Department.
12. All development pursuant to this grant shall conform with the requirements of the County Department of Public Works to the satisfaction of said department.
13. All development pursuant to this grant shall comply with the requirements of Title 22 of the County Code and of the specific zoning of the subject property, unless

specifically modified by this grant, as set forth in these conditions, including the approved Exhibit "A," or a revised Exhibit "A" approved by the Director of Regional Planning ("Director").

14. The Permittee shall maintain the subject property in a neat and orderly fashion. The Permittee shall maintain free of litter all areas of the premises over which the Permittee has control.
15. All structures, walls and fences shall remain free of graffiti or other extraneous markings, drawings, or signage that was not approved by LA County Planning. These shall include any of the above that do not directly relate to the business being operated on the premises or that do not provide pertinent information about said premises. The only exceptions shall be seasonal decorations or signage provided under the auspices of a civic or non-profit organization.

In the event of graffiti or other extraneous markings occurring, the Permittee shall remove or cover said markings, drawings, or signage within 48 hours of such notification, weather permitting. Paint utilized in covering such markings shall be of a color that matches, as closely as possible, the color of the adjacent surfaces.

16. The subject property shall be developed and maintained in substantial conformance with the plans marked Exhibit "A", including the location of the existing heliport all other existing and proposed structures, including but not limited to trails, roads, camping areas, signs, fences, storage containers, canopies, and other features.
17. In the event that subsequent revisions to the approved Exhibit "A" are submitted, the Permittee shall submit **one (1) digital copy** of the proposed plans to the Director for review and approval. All revised plans must substantially conform to the originally approved Exhibit "A." All revised plans must be accompanied by the written authorization of the property owner(s) and applicable fee for such revision.

### **PROJECT-SPECIFIC CONDITIONS**

18. This grant shall authorize an amusement ride (bungee jumping), a private heliport, and overnight camping with appurtenant facilities (a container used as a hangar to store a helicopter, two storage containers, a storage building, an office, a security booth, a restroom building with composting toilets, a removable shade canopy, a directional/informational sign, and fencing) on the Project Site without any required on-site parking.
19. No dedicated parking is required for the project.
20. The Permittee shall encourage guests to carpool or rideshare to the trailhead to minimize the number of cars parked in the vicinity of the trailhead of the East Fork Trail. The Permittee's website and any other promotional materials related to the Project shall include a statement that encourages guests to carpool or rideshare to the trailhead of the East Fork Trail.

21. The total number of guests shall not exceed the following limits: 144 guests on one tour; 177 guests in one day, including overnight guests; 1,186 guests in one month; and 8,437 guests in one calendar year. The Permittee shall maintain logs of the number of guests and the number of bungee jumps for each tour and shall provide them to LA County Planning upon request. The logs shall be maintained in a digital format that can be emailed to LA County Planning.
22. The maximum number camping nights allowed at the Project Site in one calendar year is 13. The maximum number of guests participating in camping nights at the Project Site in one calendar year is 169. The maximum number of guests participating in any single camping night at the Project Site is 22. The Permittee shall maintain logs of all camping nights, including the date of each camping night and the number of guests on each camping night, and shall provide them to LA County Planning upon request. The logs shall be maintained in a digital format that can be emailed to LA County Planning.
23. The Permittee shall comply with all requirements provided in the attached letter issued by the Department of Public Health ("Public Health") dated August 22, 2024.
24. The Permittee shall comply with all conditions provided in the attached letter issued by the County Fire Department ("Fire Department") dated January 8, 2024.
25. The Permittee shall comply with all applicable regulations of the California Department of Transportation Division of Aeronautics and the Federal Aviation Administration ("FAA") for the private heliport, including the condition in the attached FAA memorandum dated April 15, 2020. The heliport shall only function as an accessory use to the amusement ride (bungee jumping) and not as a separate or independent use. The private heliport shall be removed if the amusement ride (bungee jumping) use is discontinued.

**PROJECT-SPECIFIC CONDITIONS: COMPOSTING TOILET SYSTEM**

26. The Permittee shall comply with all requirements related to the composting toilet system required by Condition 28, below, that are provided in the attached letter issued by Public Health dated August 22, 2024, as well as Conditions 27 through 33, below.
27. Within three (3) months of the date of final approval, the Permittee shall select a certified industrial hygienist to assist with the activities required by Conditions 29 through 33, below, and provide information regarding their qualifications, expertise, and experience to the satisfaction of the Director. The Permittee may request a single three (3) month time extension in writing before the initial three (3) month period ends, which the Director may grant. After the Permittee provides the required information to the satisfaction of the Director, the Director may approve the certified industrial hygienist based on an evaluation of their qualifications, expertise, and experience, and may consult with Public Health, if needed, before making a decision.

If the Director does not approve the certified industrial hygienist, the Permittee shall select a different certified industrial hygienist and provide the information required above, and the Director shall conduct the same evaluation described above. If the Director does not approve the other certified industrial hygienist, the process described above shall be repeated until such time that the Director approves a certified industrial hygienist. The process described above shall also be repeated if the Permittee decides to select a different certified industrial hygienist than the one approved by the Director at any time during the grant term. Throughout the grant term, the Permittee shall be responsible for paying all expenses that are incurred by the certified industrial hygienist(s) approved by the Director when they assist with the activities required by Conditions 29 through 33, below.

28. Within six (6) months of the date of final approval, the Permittee shall install a composting toilet system. The Permittee may request a single six (6) month time extension in writing before the initial six (6) month period ends, which the Director may grant.
29. When the composting toilet system is installed, the certified industrial hygienist approved by the Director shall inspect and approve the installation. The certified industrial hygienist shall also determine that it is appropriately sized to meet anticipated demand and otherwise meets the specifications for proper functioning. The certified industrial hygienist shall submit a written report indicating this approval to the Director for future reference.
30. Six (6) months after the composting toilet system is installed, the certified industrial hygienist approved by the Director shall inspect the facility and submit a written report to the Director regarding the facility and whether it continues to meet the specifications for proper functioning.
31. After the inspection required by Condition 30, above, the certified industrial hygienist approved by the Director shall inspect the composting toilet system and submit a written report to the Director regarding the facility and whether it continues to meet the specifications for proper functioning at one year intervals (i.e., eighteen (18) months after the composting toilet system is installed, thirty (30) months after the composting toilet system is installed, etc.).
32. In addition to the inspections required by Condition 31, above, the Director may, at any other time, require the certified industrial hygienist approved by the Director to inspect the composting toilet system and submit a written report to the Director regarding the facility and whether it continues to meet the specifications for proper functioning.
33. If the Director, after reviewing any of the reports required by Conditions 30 through 32, above, and after consulting with Public Health, if needed, determines that the composting toilet no longer meets the specifications for proper functioning, the Director shall require the Permittee to cease operations until such time that necessary repairs or modifications are made, inspected, and approved by the

certified industrial hygienist to the satisfaction of the Director, following consultation with Public Health, if needed. If the Permittee does not comply with this condition, pursuant to Condition 10, above, the Director shall initiate a public hearing before the Commission to consider modification or revocation of this grant pursuant to County Code Chapter 22.238. The Commission may, after conducting the public hearing, revoke or modify this grant if the Commission finds that these conditions have been violated or that this grant has been exercised so as to be detrimental to the public's health or safety or so as to be a nuisance, or as otherwise authorized pursuant to County Code Chapter 22.238.

Attachments:

1. Public Health Letter dated August 22, 2024
2. Fire Department Letter dated January 8, 2024
3. FAA Memorandum dated April 15, 2020

COUNTY OF LOS ANGELES • DEPARTMENT OF PUBLIC HEALTH  
ENVIRONMENTAL HEALTH

August 22, 2024

TO: Samuel Dea  
Supervising Regional Planner  
Department of Regional Planning

Attention: Richard Claghorn

FROM: Scott Abbott   
Assistant Director of Environmental Health

**SUBJECT: RPPL2018004676 – SAN GABRIEL MOUNTAINS NATIONAL  
MONUMENT INHOLDING – BUNGEE AMERICA**

The Department of Public Health -Environmental Health Division (Public Health) has reviewed the proposal for using urine-diverting composting toilets at Bungee America, located in a remote wilderness area of the San Gabriel Mountains National Monument Inholding. After carefully considering the request and reviewing the unique aspects of the project, including no road access, an inability to connect to a municipal/public sewer system and potable water supply, and an inability to install a water well and septic system, Public Health will recommend approval for the proposed use of urine-diverting composting toilets with the following conditions to be fulfilled to the satisfaction of Public Health at the permitting stage before the installation of the proposed equipment.

**Condition 1: Onsite Wastewater Treatment System: Wastewater**

- 1.1 Submit plans for the installation and usage of the proposed urine diverting composting toilet. The plans should include manufacturer specifications of all parts and equipment.
- 1.2 Provide Standard Operating Procedure for maintenance on the company letterhead to indicate the following:
  - Personal Protective Equipment required for maintenance.
  - Procedure for cleaning the maintenance equipment.
  - Detailed information on how materials are removed, and the final disposal performed.
  - Waste disposal frequency and amount.
  - Detailed information on the waste collection and disposal process.
  - Waste transportation methods to an approved waste disposal site, including types of cleaning equipment to eliminate accidental spillage of sewage waste.

- 1.3 Obtain permits for all vehicles used to transport waste material from the composting toilets to a disposal location as required by California Health and Safety Code, Sections 117400 – 117450, to the satisfaction of Public Health.

**Condition 2: Hand sanitizing**

- 2.1 Provide adequate supply of alcohol-based hand sanitizer that contains at least 60% alcohol for use on hands.
- 2.2 Ensure that hand sanitizer is maintained and serviced regularly.

Upon issuance of the Conditional Use Permit by the Department of Regional Planning, all required information as stated above must be submitted to Public Health to initiate the approval process.

If you have any other questions or require additional information, please contact Shikari Nakagawa-Ota, Director of the Environmental Protection Branch at (626) 430-5438 or [sota@ph.lacounty.gov](mailto:sota@ph.lacounty.gov).

SA:lm

c: Shikari Nakagawa-Ota, Director of Environmental Protection Branch  
Liza Frias, Director of Environmental Health



## COUNTY OF LOS ANGELES FIRE DEPARTMENT FIRE PREVENTION DIVISION

Land Development Unit  
5823 Rickenbacker Road  
Commerce, CA 90040  
Telephone (323) 890-4293, Fax (323) 890-9783

EPIC-LA NUMBER: RPPL2018004676                      PROJECT NUMBER: 2018-003069  
CITY/COMMUNITY: Angeles National Forest                      STATUS: Cleared  
PROJECT ADDRESS: San Gabriel Mountains National                      DATE: 01/08/2024  
Monument Inholding

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### CONDITIONS

1. The proposed site plan is cleared for the continued use of regular business operations provided no additional improvements are made to the existing structures. The plans show all accepted modifications to be permitted for construction.
2. Brush clearance may be required during building plan check and inspection. All requirements for brush clearance must be complied with upon identifying violations.

For any questions regarding the report, please contact Joseph Youman at (323) 890-4243 or [joseph.youman@fire.lacounty.gov](mailto:joseph.youman@fire.lacounty.gov).

A handwritten signature in black ink, appearing to read "Joseph Youman", written over a light gray rectangular background.



## Federal Aviation Administration

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### Memorandum

Date: April 15, 2020

To: Mark Steinbicker, Manager, Flight Technologies and Procedures Division  
ATTN: Richard Armstrong

**KEITH A  
FRABLE**

Digitally signed by KEITH A  
FRABLE  
Date: 2020.04.16 12:59:42  
-07'00'

From: Keith A. Frable, Manager, Riverside Flight Standards District Office

Prepared by: Roy R. Peters, Principal Operations Inspector, (951) 276-6701x329

Subject: Heliport Evaluation Request, Azusa, CA (AWP-2020-1191-NRA)

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The attached proposal for the Bridge To Nowhere (BTNW) PPR Heliport, Azusa, CA was reviewed by Inspector Peters and is returned as requested. This office has no objection with one provision.

This is a proposed private day use heliport. This office recommends the following condition should be met prior to approval: Ensure unauthorized persons are restrained from access to the takeoff/landing area during helicopter flight operations by use of a non-obstructing safety barrier.

An evaluation of the proposed heliport located near the BTNW, Azusa, California, Case Number AWP-2020-1191-NRA, was conducted in accordance with FAA Order 8900.1, Volume 8, Chapter 3, Section 3. The completed Heliport Evaluations Checklist is attached along with the original case data sent to this office.

2 Attachments

### On-Site Heliport Evaluations Checklist Job Aid – AWP220

*NOTE:* Use this checklist to complete and confirm correct data on the FAA Form 7480-1.

Name of Proponent:	Ron Jones	Site ID (if known):	BTNW PPR Heliport (80756)
NRA Tracking #:	AWP-2020-1191-NRA	Date of Inspection:	04/13/2020

<b>1. Heliport Design</b>	
A. Duration of Use: <input checked="" type="checkbox"/> Permanent <input type="checkbox"/> Temporary	
B. <input checked="" type="checkbox"/> Ground Level Heliport <input type="checkbox"/> Water Heliport <input type="checkbox"/> Ship/Barge Heliport <input type="checkbox"/> Elevated Heliport	
C. Design helicopter to use the heliport:	Robinson R-44

<b>2. Proponent Contact Information</b>			
A. Name:	Ron Jones		
B. Address:	16654 Soledad Canyon Road #464, Canyon Country, CA 91387		
C. Telephone #:	(310) 923-6306	Fax #:	(310) 322-8892
D. Email Address:	gjones827@gmail.com		

<b>3. Location of Heliport – Use GPS to confirm the lat/long/elevation during on-site inspection.</b>			
A. Street Address	Bridge to Nowhere, San Gabriel Mountains		
B. City	Azusa	State	CA
C. Latitude:	34 ° 16 ' 55.00 " N	Longitude:	117 ° 44 ' 59.00 " W
D. Elevation:	2810 ft		

<b>4. Type of Use:</b>	
A. <input type="checkbox"/> Public Use <input checked="" type="checkbox"/> Private (PPR) <input type="checkbox"/> Private Use of Public Land/Waters	
B. <input checked="" type="checkbox"/> General Aviation Heliport <input type="checkbox"/> Transport Heliport <input type="checkbox"/> Hospital Heliport	
C. <input checked="" type="checkbox"/> VFR Use <input type="checkbox"/> IFR Use (Identify Approach) :	
D. <input checked="" type="checkbox"/> Day <input checked="" type="checkbox"/> Night	

<b>5. Dimensions of Surfaces – Confirm during on-site inspection – All measurements in feet</b>			
A. Touchdown and Liftoff Area	Length:	46 ft	Width: 46 ft
B. Final Approach & T.O. Area	Length:	85 ft	Width: 85 ft

C. Safety Area	Length:	15.5 ft	Width:	15.5 ft
D. Notes: Heliport is a circular design.				

6. Suitability of Approach/Takeoff Paths	
Note: Confirm that the 8:1 slope (7.125°) is satisfactory from the forward edge of the FATO to 4000 feet. All headings should be magnetic headings from the landing area using the center of the TLOF as the reference point.	
A. Prevailing winds?	Southwest
B. Satisfactory Ingress/Egress may be accomplished from all directions:	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
C. Satisfactory only in the following area:	SEE° to NOTES°
D. Additional satisfactory area or route:	N/A° to N/A°
E. No suitable ingress/egress routes exist under the present conditions	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
F. No other ingress/egress routes should be used	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Notes/Comments: Surveyed proponent's proposed ingress/egress routes (035/215 degrees MAG and 090/270 degrees MAG). Proposed routes SATISFACTORY.	

7. Landing Area Data – Note during on-site inspection	
A. Type of surface:	<input checked="" type="checkbox"/> Concrete <input type="checkbox"/> Asphalt <input type="checkbox"/> Metal <input type="checkbox"/> Water <input type="checkbox"/> Wood <input type="checkbox"/> Other
B. Weight Limit:	12000 lbs.
C. Approved Heliport Markings:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
D. Approved Heliport Lighting:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
E. Night Vision Goggle Ops Planned?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unknown
Notes/Comments: None.	

<b>8. Other Heliport Data – Note during on-site inspection</b>	
A. Heliport Beacon:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required
B. Communication Plan:	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
C. Does the Heliport have fire protection?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required
D. Describe the kind of fire protection (note if NFPA 418 approved): Portable fire extinguisher (Rating 20-A: 120-BC per combined NFPA 418 and California Fire Code Standards).	
E. Does the heliport have a wind direction indicator?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
F. Description (lit, location, visible from TLOF and 500 ft distance on final approach, etc.)  One 12 ft tall windcone. Windcone externally lit with red obstruction light and 4 floodlights (FEC Heliports Model HP 0907-LED). Measured from TLOF, windcone is at 330 degrees (MAG) approximately 146 ft.	

<b>9. Heliport Vicinity Data</b>	
A. List any other landing areas within 5 nm of the site (Name, location ID, type (airport, heliport, seaplane), direction, and distance from the site: Brackett Field (KPOC) 4.75 NM 151 degrees (MAG).	
B. List any obstructions in the vicinity of the approach/departure protection area. Include recommended mitigation for obstructions that penetrate the 8:1, such as limited ingress/egress routes to avoid, removal, lowering, lighting, or marking the obstacle, etc. Two power poles penetrate Outbound Course 1 (departure heading 035 degrees MAG) transition area. Pole 1 is 033 degrees MAG, 734 ft from FATO. Power pole 2 is 011 degrees MAG, 841 ft from FATO. Both power poles penetrate the same side of the transition area. According to builder's plans, transitional surface penetrations to be marked with red obstruction lights. During the site survey, Los County Department of Public Works Dam Supervisor Stan Brown stated that all power poles in the vicinity of the heliport are to be removed and wires buried.	
List possible noise sensitive areas in the vicinity and direction/distance from site, such as schools, public areas, wildlife, etc. Residential neighborhood 222 degrees (MAG) 1.53 nm.	

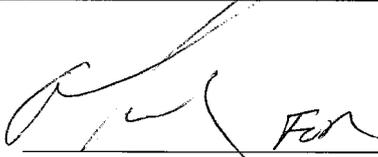
10. State and Local Requirements	
A. Proponent informed to verify building permit and zoning rules met:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
B. Proponent informed to contact state aviation authorities:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
C. Proponent notified to address any environmental requirements?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

11. Does the heliport meet AC 150/5390-2B design criteria for:		
A. TLOF	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Reason:
B. FATO	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Reason:
C. Safety Area	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Reason:
D. VFR App/Dep Paths	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Reason:
E. MRI	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	Reason:
F. Wind Direction	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Reason:
G. Taxiways	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	Reason:
H. Helicopter Parking	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	Reason:
I. Markings	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Reason:
J. Lighting	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Reason:
K. Obstructions	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Reason:
L. Safety Enhancements	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	Reason:
M. Zoning/Land Use	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	Reason:

12. Conclusion	
A. In your opinion, can helicopter operations be conducted safely at the proposed site?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> Provisionally <input type="checkbox"/> No
B. List provisions for safe helicopter operations: None.	

C. List recommendations for safe helicopter operations: (1) Remove power poles in the immediate vicinity of the heliport and place the power lines underground; (2) A representative of Flight Standards Service (AFS) evaluates the heliport for compliance prior to operational use; (3) Ensure unauthorized persons are restrained from access to the takeoff/landing area during helicopter flight operations by use of a non-obstructing safety barrier. The proposed heliport sits next to a road.

Roy R. Peters



~~11/22/2017~~ *GR*

*4/16/2020*

Inspector Name

Signature

Date

## REPORT TO THE REGIONAL PLANNING COMMISSION

DATE ISSUED: August 29, 2024

HEARING DATE: September 11, 2024 AGENDA ITEM: 9

PROJECT NUMBER: 2018-003069-(5)

PERMIT NUMBER(S): Conditional Use Permit (“CUP”) RPPL2018004676  
Variance RPPL2018004861

SUPERVISORIAL DISTRICT: 5

PROJECT LOCATION: Assessor’s Parcel Numbers (“APNs”) 8678-002-015  
and 8678-002-016

OWNER: Saunders Mine LLC

APPLICANT: Bungee America, Inc.

### **RECOMMENDATION**

*The following recommendation is made prior to the public hearing and is subject to change based upon testimony and/or documentary evidence presented at the public hearing:*

LA County Planning staff (“Staff”) recommends **APPROVAL** of Project Number 2018-003069-(5), CUP Number RPPL2018004676 and Variance Number RPPL2018004861, based on the Findings (Exhibit C – Findings) contained within this report and subject to the Draft Conditions of Approval (Exhibit D – Conditions of Approval).

Staff recommends the following motions:

### **CEQA:**

**I MOVE THAT THE REGIONAL PLANNING COMMISSION CLOSE THE PUBLIC HEARING AND FIND THAT THE PROJECT IS CATEGORICALLY EXEMPT PURSUANT TO STATE AND LOCAL CEQA GUIDELINES.**

### **ENTITLEMENTS:**

**I MOVE THAT THE REGIONAL PLANNING COMMISSION APPROVE CONDITIONAL USE PERMIT NUMBER RPPL2018004676 AND VARIANCE NUMBER RPPL2018004861 SUBJECT TO THE ATTACHED FINDINGS AND CONDITIONS.**

### **PROJECT DESCRIPTION**

#### **A. Entitlement(s) Requested**

- A CUP to authorize an amusement ride (bungee jumping), a private heliport, and overnight camping with appurtenant facilities (a container used as a hangar to store a

helicopter, two storage containers, a storage building, an office, a security booth, a restroom building with composting toilets, a removable shade canopy, a directional/informational sign, and fencing) (“Project”) in the C-R (Commercial Recreation) Zone pursuant to County Code Section 22.20.030 (Land Use Regulations for Commercial Zones).

- A Variance to waive the parking requirements for the Project pursuant to County Code Section 22.194.020 (Variances – Applicability).

**B. Project**

The applicant, Bungee America, Inc. (“applicant”), is requesting a CUP to authorize the Project, which is located on a private inholding within the Angeles National Forest along the East Fork Trail, also known as the Bridge to Nowhere (“Project Site”), and a Variance to waive the parking requirements for the Project.

The 50-acre Project Site consists of APNs 8678-002-015 and 8678-002-016. The Project Site is accessible from the East Fork Trail, a horse riding and hiking trail that starts at the end of Camp Bonita Prairie Forks Road, also known as Camp Bonita Road, which is the nearest public road to the Project Site. The Camp Bonita Road public right-of-way is 60 feet wide. The trailhead of the East Fork Trail is located at a parking lot on land owned by the United States Forest Service (“USFS”) at the end of Camp Bonita Road. The distance from the trailhead of the East Fork Trail to the Project Site is approximately five miles. The only other means of access to the Project Site is by helicopter, and the Project includes a private heliport and a container used as a hangar to provide a secondary means of access.

**SUBJECT PROPERTY AND SURROUNDINGS**

The following chart provides property data within a 500-foot radius:

<b>LOCATION</b>	<b>ANTELOPE VALLEY AREA PLAN LAND USE POLICY</b>	<b>ZONING</b>	<b>EXISTING USES</b>
SUBJECT PROPERTY	CR (Rural Commercial)	C-R	Amusement ride (bungee jumping) and private heliport
NORTH	OS-NF (Open Space – National Forest)	W (Watershed)	National Forest
EAST	OS-NF	W	National Forest
SOUTH	OS-NF	W	National Forest
WEST	OS-NF	W	National Forest

**PROPERTY HISTORY**

**A. Zoning History**

ORDINANCE NO.	ZONING	DATE OF ADOPTION
7395	A-1-5 (Light Agricultural, Five Acre Minimum Required Lot Area)	September 23, 1958
20150021Z	C-R	June 16, 2015

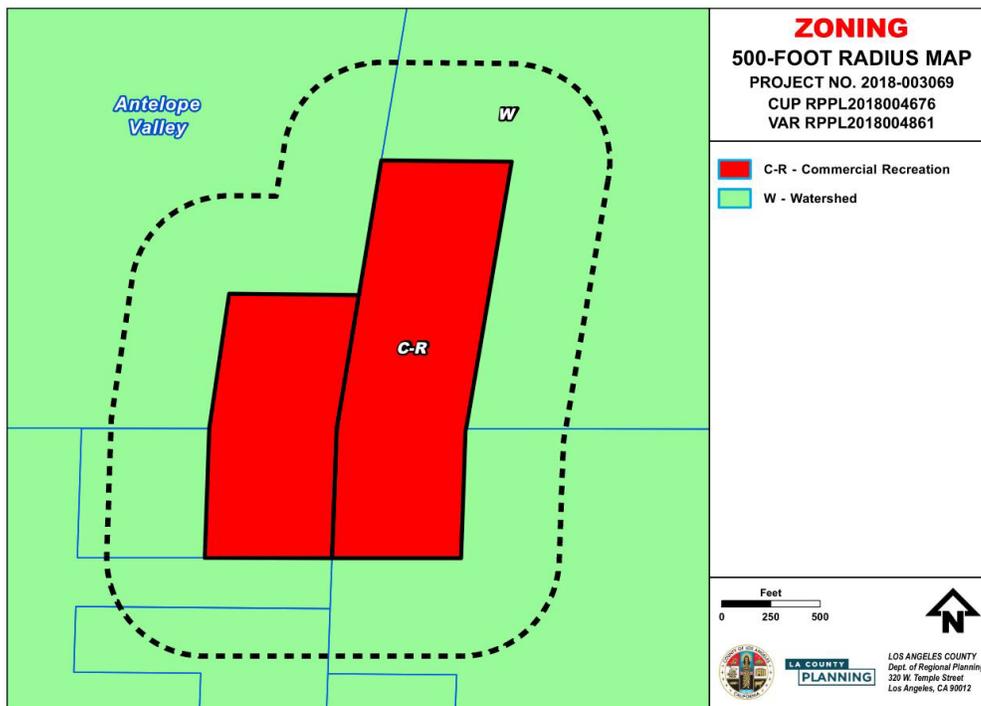
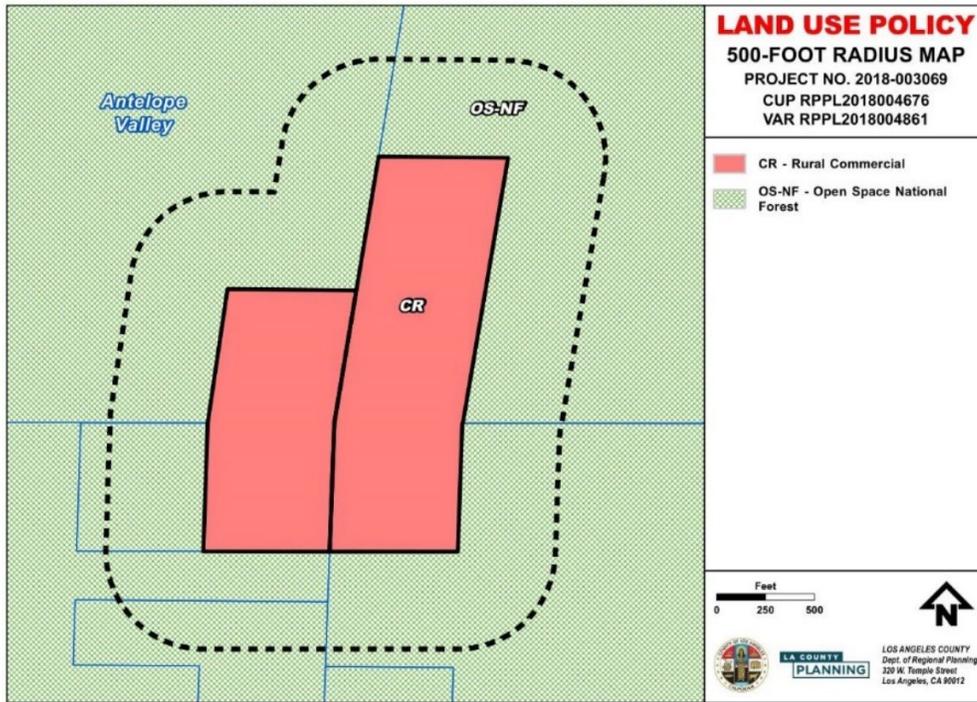
**B. Previous Cases**

CASE NO.	REQUEST	DATE OF ACTION
Certificate of Compliance No. RPPL2018004675	Certify legality of the Project Site parcels and hold them together as one parcel	Recorded September 9, 2019

**C. Violations**

CASE NO.	VIOLATION	CLOSED/OPEN
14-0002827	Amusement rides (zipline and bungee jumping) and appurtenant facilities (cargo containers) maintained on the Project Site without approval	Opened April 30, 2014

MAPS



## **ANALYSIS**

### **A. Land Use Compatibility**

The Project Site is located within the CR land use designation of the Antelope Valley Area Plan (“Area Plan”), a component of the General Plan. The CR land use designation identifies lands in the planning area that are designated for limited, low-intensity commercial uses that are compatible with rural and agricultural activities. Specific allowable uses are determined by the underlying zoning designation. The C-R Zone allows amusement rides and private heliports with a CUP and allows campgrounds with a Ministerial Site Plan Review.

The Bridge to Nowhere was built in 1936. In 1938, a flood occurred which washed out the road leading to the bridge, leaving the bridge cut off from any roads and isolated in a remote area. While the road leading to the bridge was abandoned, the Bridge to Nowhere has remained in place and is now under private ownership. The applicant has operated a bungee jumping business at the Bridge to Nowhere since 1989.

Since 1993, the applicant has had permits to operate an amusement ride (bungee jumping) at the Project Site issued by the State of California Department of Industrial Relations’ Division of Occupational Safety and Health (“DOSH”). The permits from DOSH are renewed annually. However, the applicant did not obtain County approval for this land use. A CUP is required for an amusement ride pursuant to County Code Section 22.20.030 (Land Use Regulations for Commercial Zones).

On May 8, 2014, Staff issued a Notice of Violation for maintaining amusement rides (bungee jumping and a zipline) and appurtenant facilities (cargo containers) on the Project Site because these land uses were not permitted in the A-1-5 Zone. On October 28, 2014, the applicant requested a Clean Hands Waiver (“CHW”) pursuant to County Code Section 22.02.070 (Application Where Violation Exists) to allow one of the land uses (bungee jumping) to continue operating while Staff processed an application to approve the land use.

On June 16, 2015, the Project Site’s zoning was changed from A-1-5 to C-R as part of a series of zone changes related to the adoption of the Area Plan. The C-R zone allows the amusement ride (bungee jumping) with a CUP. The land use remained in violation because it was not operating with a CUP.

On July 3, 2018, the Director of Regional Planning (“Director”) approved the CHW request, which allowed the applicant to continue operating the land use for a period of one year while Staff processed a CUP application. On September 13, 2018, the applicant submitted applications for a CUP to authorize the land use and a Parking Permit to modify the parking requirements for the land use. On September 24, 2018, the applicant withdrew the Parking Permit application and submitted a Variance application to waive the parking requirements for the land use. The CHW has been extended multiple times and the current CHW extension expires on February 1, 2025. A copy of the most recent CHW

extension letter, dated February 7, 2024, is attached (Exhibit M – CHW 2024 Time Extension).

Bungee America is a well-established business that has operated at the Bridge to Nowhere since 1989, a period of approximately 35 years. Although the Project Site does not have any parking spaces due to its location five miles from the nearest public road, Bungee America guests have parked at the parking lot at the trailhead of the East Fork Trail and along Camp Bonita Road since the business has been in operation. United States Code Title 16, Section 3170 (b), guarantees a right of access to private inholdings within public lands, including for economic and other purposes, as follows:

**Right Of Access to State or Private Owner or Occupier**

Notwithstanding any other provisions of this Act or other law, in any case in which State owned or privately owned land, including subsurface rights of such owners underlying public lands, or a valid mining claim or other valid occupancy is within or is effectively surrounded by one or more conservation system units, national recreation areas, national conservation areas, or those public lands designated as wilderness study, the State or private owner or occupier shall be given by the Secretary such rights as may be necessary to assure adequate and feasible access for economic and other purposes to the concerned land by such State or private owner or occupier and their successors in interest. Such rights shall be subject to reasonable regulations issued by the Secretary to protect the natural and other values of such lands.

Therefore, federal law allows the applicant and Bungee America employees and guests to use the existing parking facilities on USFS land to access the Project Site. From 1995 to 2014, the USFS provided the applicant with USFS Administrative Parking Passes for him and his employees to park at the trailhead. However, the applicant has stated that these parking passes are no longer needed because he and his employees now use the same USFS Adventure Passes used by others who enter the Angeles National Forest, including guests who use the bungee jumping facilities. The applicant is an authorized vendor of USFS Adventure Passes, which are required to park in the existing designated parking areas.

The applicant submitted a Variance application to waive the parking requirements for the Project because of the unique circumstances of the Project Site, which is five miles from the nearest public road, and the lack of alternative parking facilities in the vicinity. The draft conditions of approval set limits on the number of guests for the Project on a daily, monthly, and annual basis, as well as limits on the number of overnight camping trips and the number of overnight guests on an annual and nightly basis. These limits are based on the applicant's guest logs for the time period of 2013 to 2015, which also established the baseline for the Project's environmental analysis, as explained below. These limits will ensure that the Project will continue its current operations without increasing the existing impacts to the environment and continue to be compatible with the area.

The Project includes a private heliport. The heliport is comprised of a helicopter landing area and a and a container used as a hangar. The helicopter is usually kept off site and is infrequently flown to the Project Site. The helicopter flights are for logistical support, such as carrying equipment and supplies and removing waste and trash from the Project Site. The helicopter is not used for carrying guests to or from the Project Site. The applicant requests the continued use of the existing private heliport on the Project Site, which has not been previously authorized by the County.

Currently there is an outhouse on the Project Site to serve employees and customers. It will be replaced by a new restroom building on the Project Site with composting toilets. The composting toilets would allow for the composting of human solid waste on the Project Site while human liquid waste would be transported off the site by a helicopter. This change will reduce the amount of waste and will dispose the waste in a more efficient and environmentally sensitive way. The draft conditions of approval require periodic evaluations of the composting toilet system by a certified industrial hygienist throughout the grant term to ensure that it is functioning correctly to the satisfaction of the Director. If it is not functioning correctly, the draft conditions of approval require that the operation of the Project must cease until necessary repairs or modifications are made, inspected, and approved by a certified industrial hygienist to the satisfaction of the Director. If necessary, the Director will initiate a modification or revocation of the CUP pursuant to County Code Chapter 22.238 (Modifications and Revocations).

**B. Neighborhood Impact (Need/Convenience Assessment)**

The Project Site is in a very remote area surrounded by USFS land and is not located near any other existing land uses. The surrounding area includes riding and hiking trails and wilderness land. The nearest existing residences and other land uses are miles away. As noted above, the draft conditions of approval include limits on the number of guests for the Project, so there will not be a significant increase in the number of people visiting the Project Site and using the USFS parking facilities associated with the Project. Therefore, the Project is not anticipated to have a significant impact on the surrounding area.

**C. Design Compatibility**

The existing land use's design is compatible with the surrounding wilderness area. The appurtenant facilities are small in scale, functional, and are designed to meet the basic needs of the amusement ride (bungee jumping) land use, including an office, storage containers and a storage building, a restroom, and a security booth. The existing land use will not be expanded or significantly modified. A new restroom facility with composting toilets will replace the existing outhouse, and minor changes may be made to existing structures.

**GENERAL PLAN/COMMUNITY PLAN CONSISTENCY**

The Project is consistent with applicable goals and policies of the General Plan and Area Plan. Consistency findings can be found in the attached Findings (Exhibit C – Findings).

The following General Plan policies apply to the proposed Project:

- *General Plan Economic Development Policy ED 1.1:* “Encourage a diverse mix of industries and services in each Planning Area.”

The Project is a unique business that has been providing recreational opportunities for the public for approximately 35 years and its continued operation will contribute to the range of services available in the Antelope Valley Planning Area.

- *General Plan Economic Development Policy ED 1.4:* “Encourage the expansion and retention of targeted industries and other growth economic sectors, such as the entertainment industry, aerospace industry, agriculture, transportation/logistics, healthcare, biomed/biotech, hospitality and tourism.”

The Project is a recreational business that contributes to tourism in the County, an important economic sector. The continued operation of this existing use, which has operated for approximately 35 years, will promote tourism in the County and contribute to economic activity for the Project and at other businesses in the County which support the visitors using the Project.

The following Area Plan policy applies to the proposed Project:

- *Area Plan Economic Development Policy ED 1.17:* “Promote uses and activities that rely on the natural state of the environment to take advantage of the vast areas of relatively undisturbed natural areas in the Antelope Valley. These include recreational, tourism and film-making uses.”

Bungee America is a small business that has operated on the Project Site for approximately 35 years and is part of the tourism sector, which is an important part of the economy of the County and the Southern California region. The Project promotes activities that rely on the natural environment and contributes to the tourism in the County.

### **ZONING ORDINANCE CONSISTENCY**

The Project complies with all applicable Zoning Code requirements, except for on-site parking requirements, which would be waived by the requested Variance. Consistency findings with further details can be found in the attached Findings (Exhibit C – Findings).

### **APPLICANT’S REQUIRED CUP AND VARIANCE FINDINGS**

The applicant is required to substantiate all facts identified by County Code Section 22.158.050.B (CUP Findings) and County Code Section 22.194.050.B (Variance Findings). The required CUP Findings and Variance Findings forms with the applicant’s responses are attached (Exhibit E – Applicant’s CUP Findings / Variance Findings). Staff is of the opinion that the applicant has met the required findings for the CUP and the Variance.

### **ENVIRONMENTAL ANALYSIS**

Staff recommends that this Project qualifies for Class 1 (Existing Facilities), Class 3 (New Construction or Conversion of Small Structures), Class 5 (Minor Alterations in Land Use Limitations), and Class 23 (Normal Operations of Facilities for Public Gatherings) Categorical Exemptions under State CEQA Guidelines Sections 15301, 15303, 15305, and 15323 and the County Environmental Document Reporting Procedures and Guidelines.

This Project will authorize an existing amusement ride (bungee jumping), a private heliport, and overnight camping with appurtenant facilities (a container used as a hangar to store a helicopter, two storage containers, a storage building, an office, a security booth, a restroom building with composting toilets, a removable shade canopy, a directional/informational sign, and fencing). No changes to the existing facilities are proposed except for a new 160-square-foot restroom building with composting toilets to replace the existing outhouse, a new 80-square-foot security booth, new fencing and a new gate, new signage, and new roofs with solar panels on existing structures. The existing outhouse will be converted into a storage structure. The proposed changes to the facilities are minor in scope and would not create any significant new impacts.

No expansion of the number of visitors is proposed, and the number of visitors will remain within the Project baseline that was based on the applicant's guest logs for the time period of 2013 to 2015. The Project will not have a significant effect on the environment. No development is proposed in a Significant Ecological Area or any other designated environmental resource area. The Project does not result in cumulative impacts, is not near a scenic highway, is not included on a list of hazardous waste sites, does not impact historic resources, and does not result in other significant effects on the environment. Therefore, no exceptions to the Categorical Exemptions mentioned above are applicable and the Project can be considered exempt. An environmental determination (Exhibit F – Environmental Determination) was issued for the Project.

### **COMMENTS RECEIVED**

#### **A. County Department Comments and Recommendations**

The Department of Public Works recommended clearance to public hearing with no conditions or comments in a letter dated January 30, 2024.

The Department of Public Health recommended clearance to public hearing with conditions in a letter dated August 22, 2024. The Department of Public Health's recommended conditions have been incorporated into the proposed conditions of approval.

The Fire Department recommended clearance to public hearing with conditions in a letter dated January 8, 2024. The Fire Department's recommended conditions have been incorporated into the proposed conditions of approval.

**B. Other Agency Comments and Recommendations**

The Federal Aviation Administration (“FAA”) issued a memorandum dated April 15, 2020, approving the private heliport. The FAA approval includes a condition to use of a non-obstructing safety barrier to ensure that unauthorized persons are restrained from access to the takeoff/landing area during helicopter flight operations. The FAA’s condition has been incorporated into the proposed conditions of approval.

DOSH issued a Certificate of Inspection for Bungee America, which functions as an approval, on December 7, 2023. This Certificate of Inspection was issued after DOSH conducted an inspection of safety-related systems and structural attributes of the amusement ride (bungee jumping) on November 26, 2023. During this inspection, DOSH did not note any deficiencies and determined that the ride complied with their requirements. The DOSH approval expires on October 7, 2025. As noted above, DOSH has issued Certificates of Inspection for the amusement ride (bungee jumping) since 1993 and inspections are conducted and certificates are renewed on an annual basis.

**C. Public Comments**

Staff received comments from members of the public regarding the Project between 2016 and 2022. These comments opposed the Director’s approval of a CHW and the continued operation of the amusement ride (bungee jumping), private heliport, and appurtenant facilities on the Project Site. These comments raised numerous concerns regarding safety, impacts to the environment, sanitation and waste disposal, parking, and the use of a helicopter. Staff received another comment in 2024 opposing the Project due to concerns with waste disposal, trash, traffic, parking, and other concerns. These comments are attached (Exhibit L – Correspondence).

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Report  
Reviewed By:   
Samuel Dea, Supervising Regional Planner

Report  
Approved By:   
Mitch Glaser, Assistant Deputy Director

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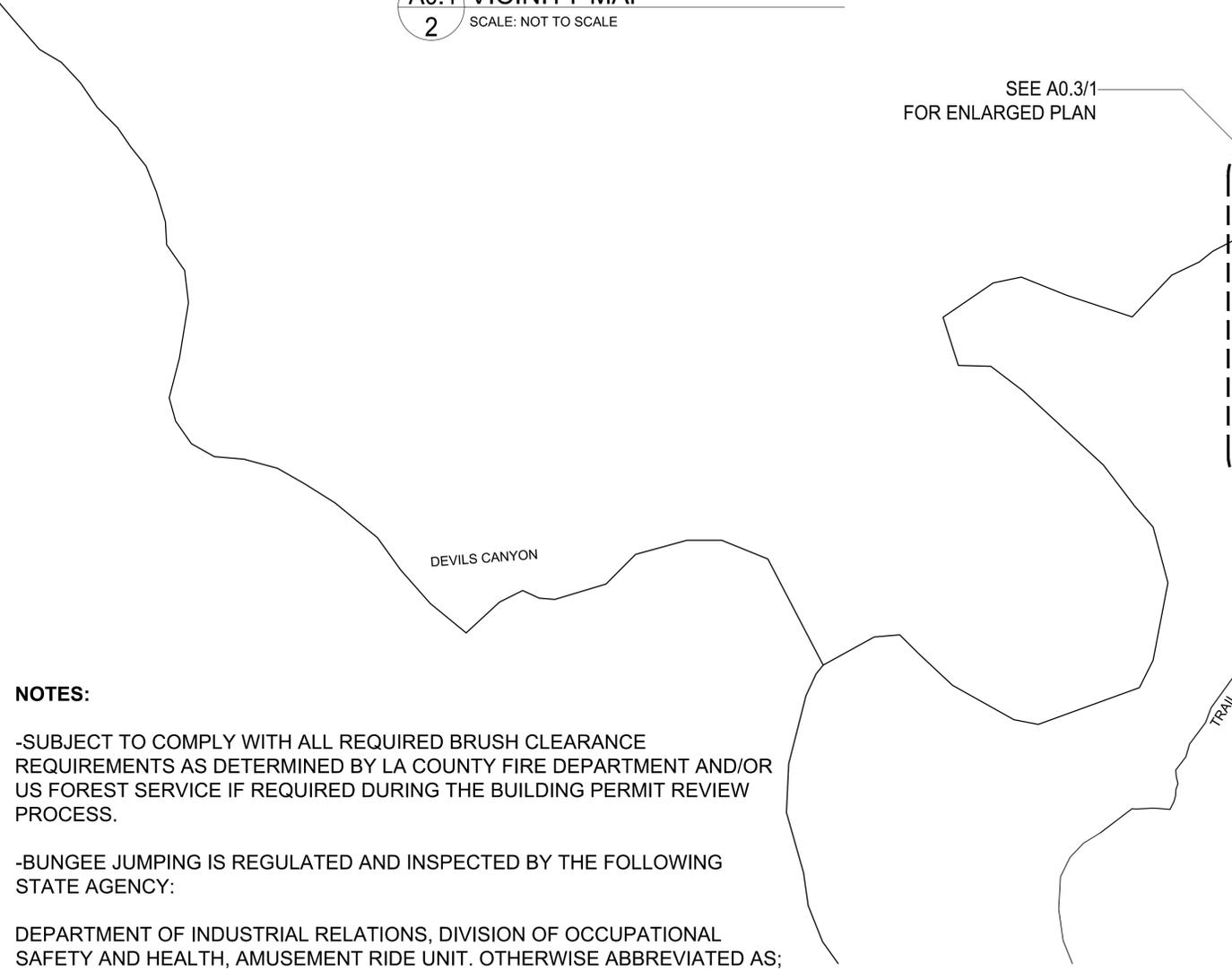
LIST OF ATTACHED EXHIBITS	
EXHIBIT A	Plans
EXHIBIT B	Project Summary Sheet
EXHIBIT C	Draft Findings
EXHIBIT D	Draft Conditions of Approval
EXHIBIT E	Applicant’s CUP Findings/ Variance Findings
EXHIBIT F	Environmental Determination
EXHIBIT G	Informational Maps

EXHIBIT H	Photos
EXHIBIT I	Public Works letter
EXHIBIT J	Public Health letter
EXHIBIT K	Fire letter
EXHIBIT L	Correspondence
EXHIBIT M	CHW 2024 Time Extension
EXHIBIT N	FAA Heliport approval
EXHIBIT O	2024-2025 DOSH Certificate of Inspection



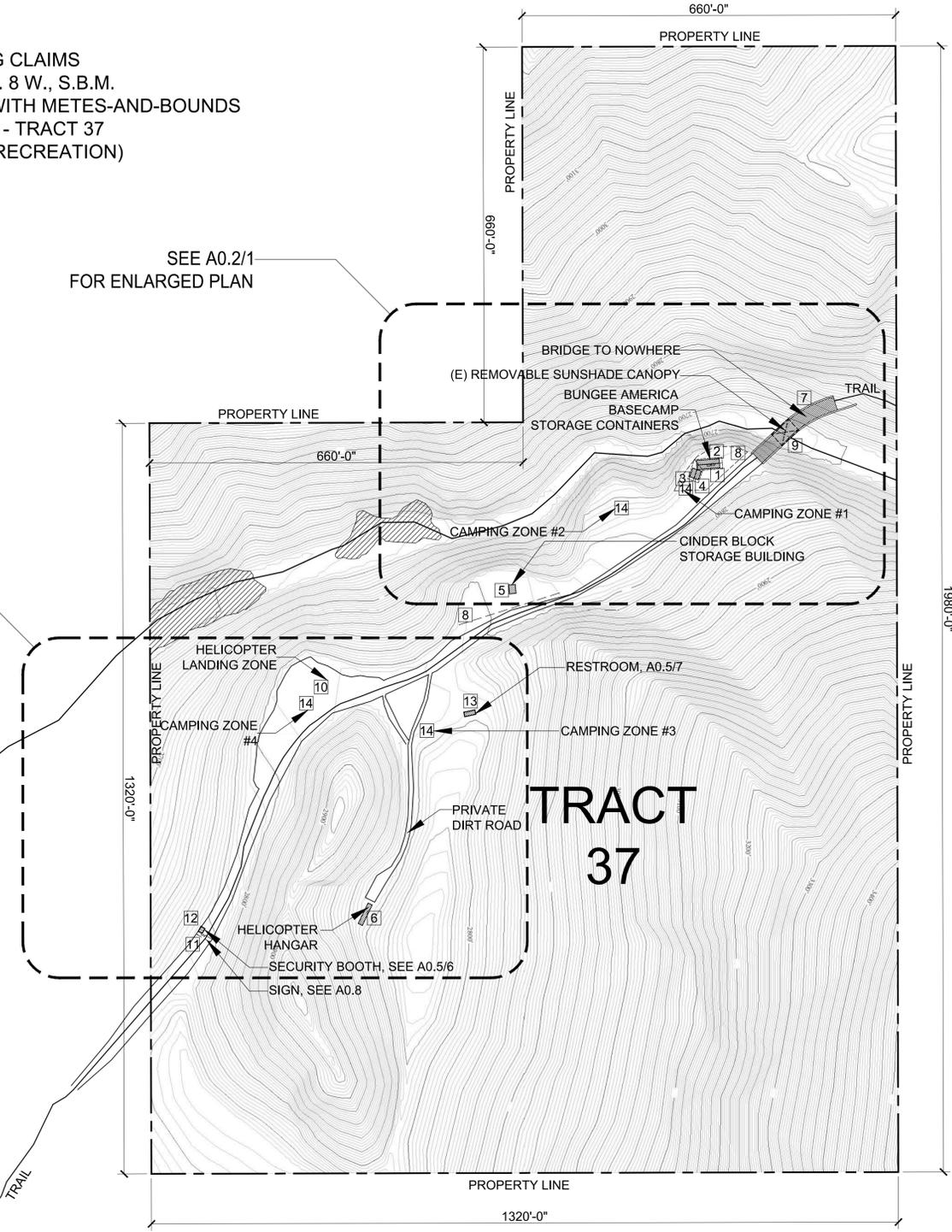
A0.1 VICINITY MAP  
2 SCALE: NOT TO SCALE

HORSESHOE PLACER MINING CLAIMS  
PATENT NO. 342527-T. 2 N., R. 8 W., S.B.M.  
ADAPTATION TO RECORDS WITH METES-AND-BOUNDS  
REMAINING PATENTED LAND - TRACT 37  
ZONING: C-R (COMMERCIAL RECREATION)



**NOTES:**

- SUBJECT TO COMPLY WITH ALL REQUIRED BRUSH CLEARANCE REQUIREMENTS AS DETERMINED BY LA COUNTY FIRE DEPARTMENT AND/OR US FOREST SERVICE IF REQUIRED DURING THE BUILDING PERMIT REVIEW PROCESS.
- BUNGEE JUMPING IS REGULATED AND INSPECTED BY THE FOLLOWING STATE AGENCY:  
DEPARTMENT OF INDUSTRIAL RELATIONS, DIVISION OF OCCUPATIONAL SAFETY AND HEALTH, AMUSEMENT RIDE UNIT. OTHERWISE ABBREVIATED AS; DOSH AMUSEMENT RIDE UNIT.
- BUNGEE JUMPING IS REGULATED AND INSPECTED UNDER THE FOLLOWING CALIFORNIA CODE OF REGULATIONS:  
TITLE 8, CCR SECTION 3195.1 - 3195.14.



- ESTIMATED CDFW JURISDICTION
- 1 STORAGE CONTAINER SEE A0.5/3 & A0.6
- 2 STORAGE CONTAINER SEE A0.5/3 & A0.6
- 3 STORAGE CONTAINER SEE A0.5/2 & A0.6
- 4 STORAGE CONTAINER SEE A0.5/2 & A0.6
- 5 CINDER BLOCK BUILDING SEE A0.5/1
- 6 HELICOPTER HANGAR SEE A0.5/4
- 7 BRIDGE TO NOWHERE
- 8 FENCE SEE A0.5/4
- 9 REMOVABLE SUNSHADE CANOPY
- 10 HELICOPTER LANDING ZONE
- 11 SIGN, SEE A0.8
- 12 SECURITY BOOTH W/ FENCE & GATE SEE A0.5/6
- 13 RESTROOM SEE A0.5/7
- 14 CAMPING ZONE

project:  
**HORSESHOE PLACER MINING CLAIMS**

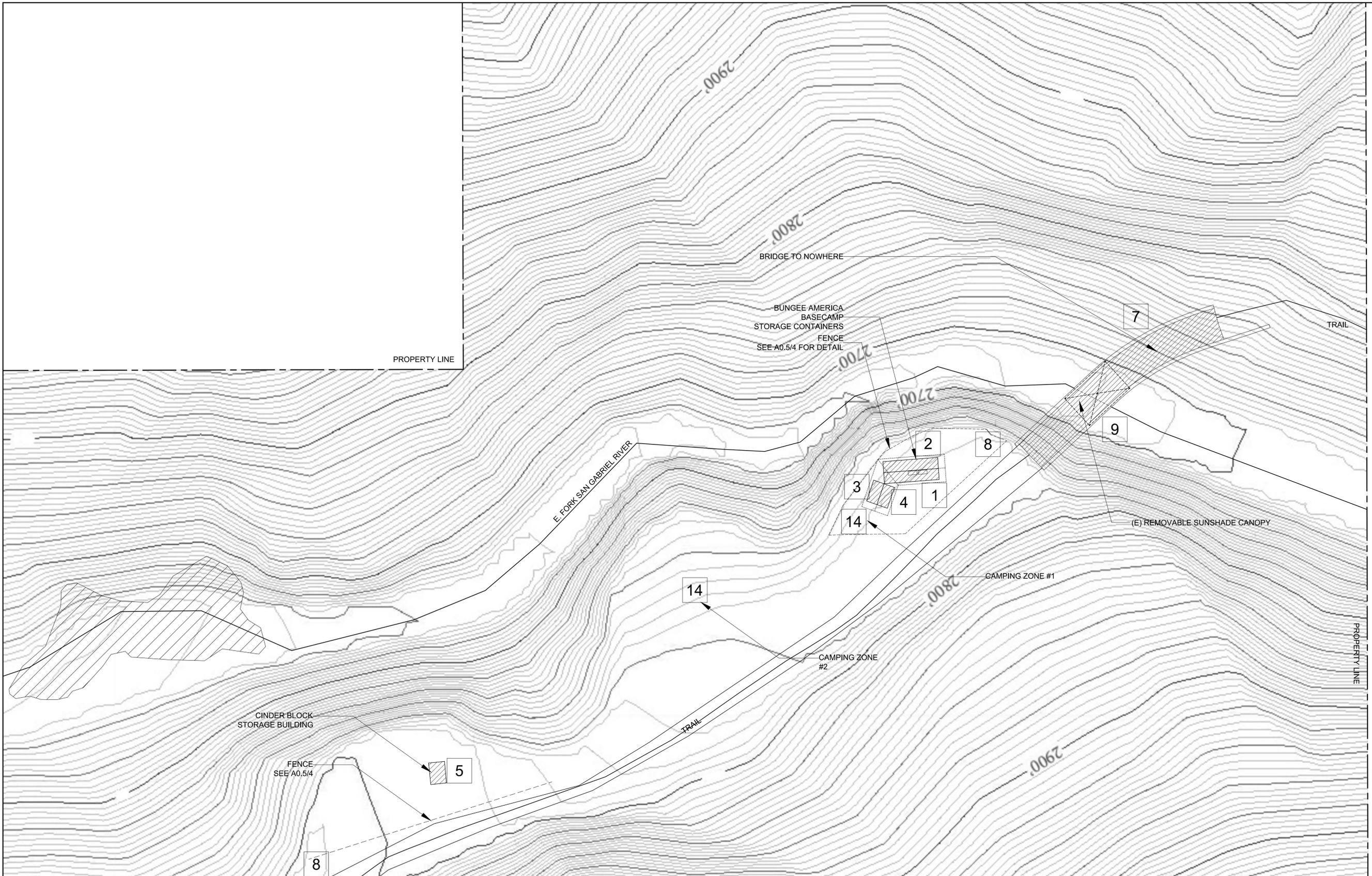
tract: 37  
apn: 8678-002-008, -009, -010 & -011

owner:  
saunders mine, llc



A0.1 SITE PLAN  
1 SCALE: 1/288" = 1'-0"

A0.1



- ESTIMATED CDFW JURISDICTION
- 1 STORAGE CONTAINER SEE A0.5/3 & A0.6
- 2 STORAGE CONTAINER SEE A0.5/3 & A0.6
- 3 STORAGE CONTAINER SEE A0.5/2 & A0.6
- 4 STORAGE CONTAINER SEE A0.5/2 & A0.6
- 5 CINDER BLOCK BUILDING SEE A0.5/1
- 6 HELICOPTER HANGAR SEE A0.5/4
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- 12 SECURITY BOOTH W/ FENCE & GATE SEE A0.5/6
- 13 RESTROOM SEE A0.5/7
- 14 CAMPING ZONE

project:  
**HORSESHOE PLACER MINING CLAIMS**

tract: 37  
 apn: 8678-002-008, -009, -010 & -011

owner:  
 saunders mine, llc

NOTE: SEE A0.1/1 FOR LOCATION OF ENLARGED SITE PLAN



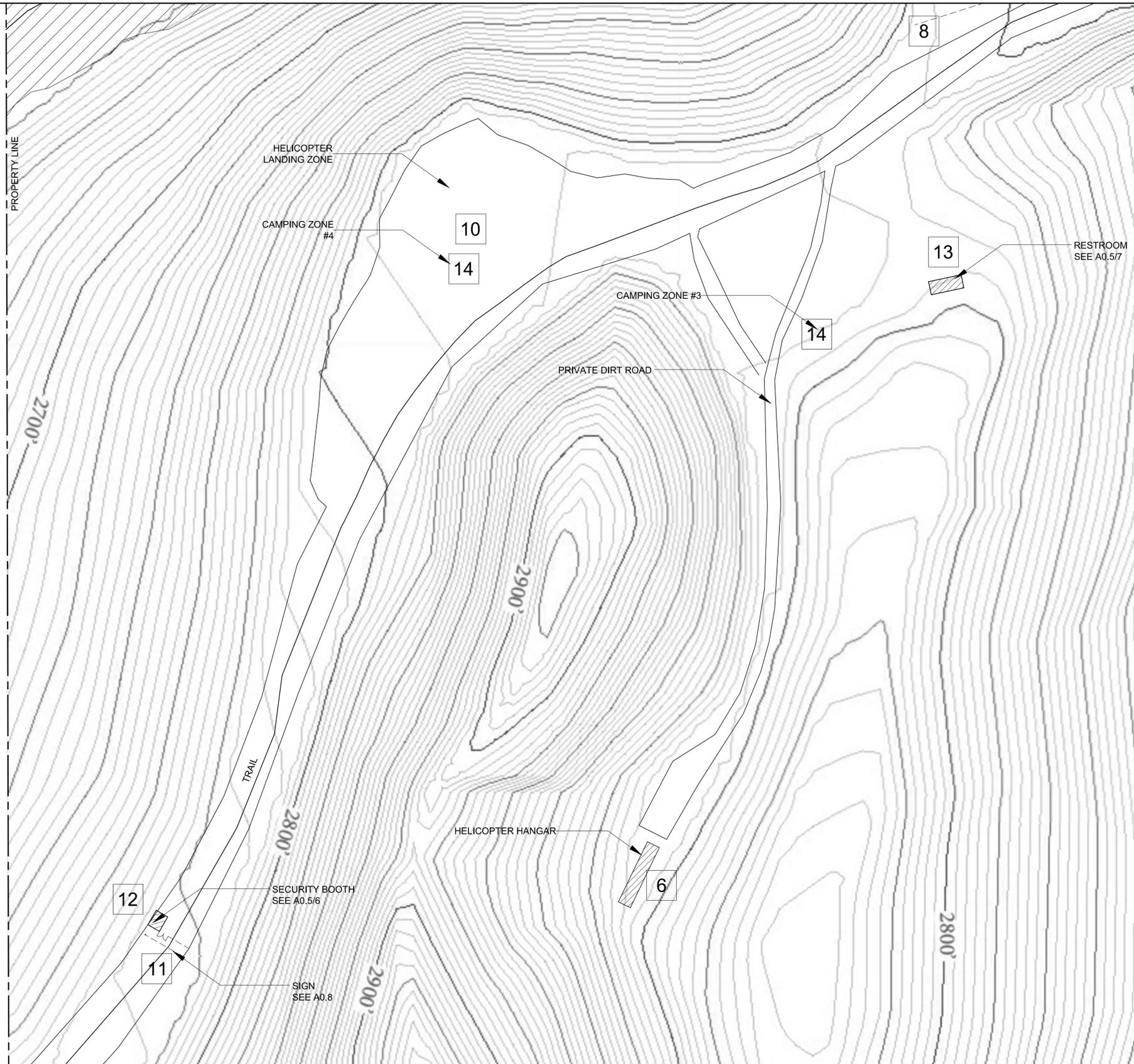
**A0.2 ENLARGED SITE PLAN**  
 1 SCALE: 1/32"=1'-0"

SITEPLAN

SCALE: 1/32"=1'-0"

01/30/2019  
 12/09/2019  
 11/01/2023  
 08/19/2024

**A0.2**



- ESTIMATED CDFW JURISDICTION
- 1 STORAGE CONTAINER SEE A0.5/3 & A0.6
- 2 STORAGE CONTAINER SEE A0.5/3 & A0.6
- 3 STORAGE CONTAINER SEE A0.5/2 & A0.6
- 4 STORAGE CONTAINER SEE A0.5/2 & A0.6
- 5 CINDER BLOCK BUILDING SEE A0.5/1
- 6 HELICOPTER HANGAR SEE A0.5/4
- 7 BRIDGE TO NOWHERE
- 8 FENCE SEE A0.5/4
- 9 REMOVABLE SUNSHADE CANOPY
- 10 HELICOPTER LANDING ZONE
- 11 SIGN, SEE A0.8
- 12 SECURITY BOOTH W/ FENCE & GATE SEE A0.5/6
- 13 RESTROOM SEE A0.5/7
- 14 CAMPING ZONE

project:  
**HORSESHOE  
 PLACER  
 MINING  
 CLAIMS**

tract: 37  
 apn: 8678-002-008,  
 -009, -010 & -011

owner:  
 saunders mine, llc

SITEPLAN

SCALE:  $\frac{1}{32}$ "=1'-0"

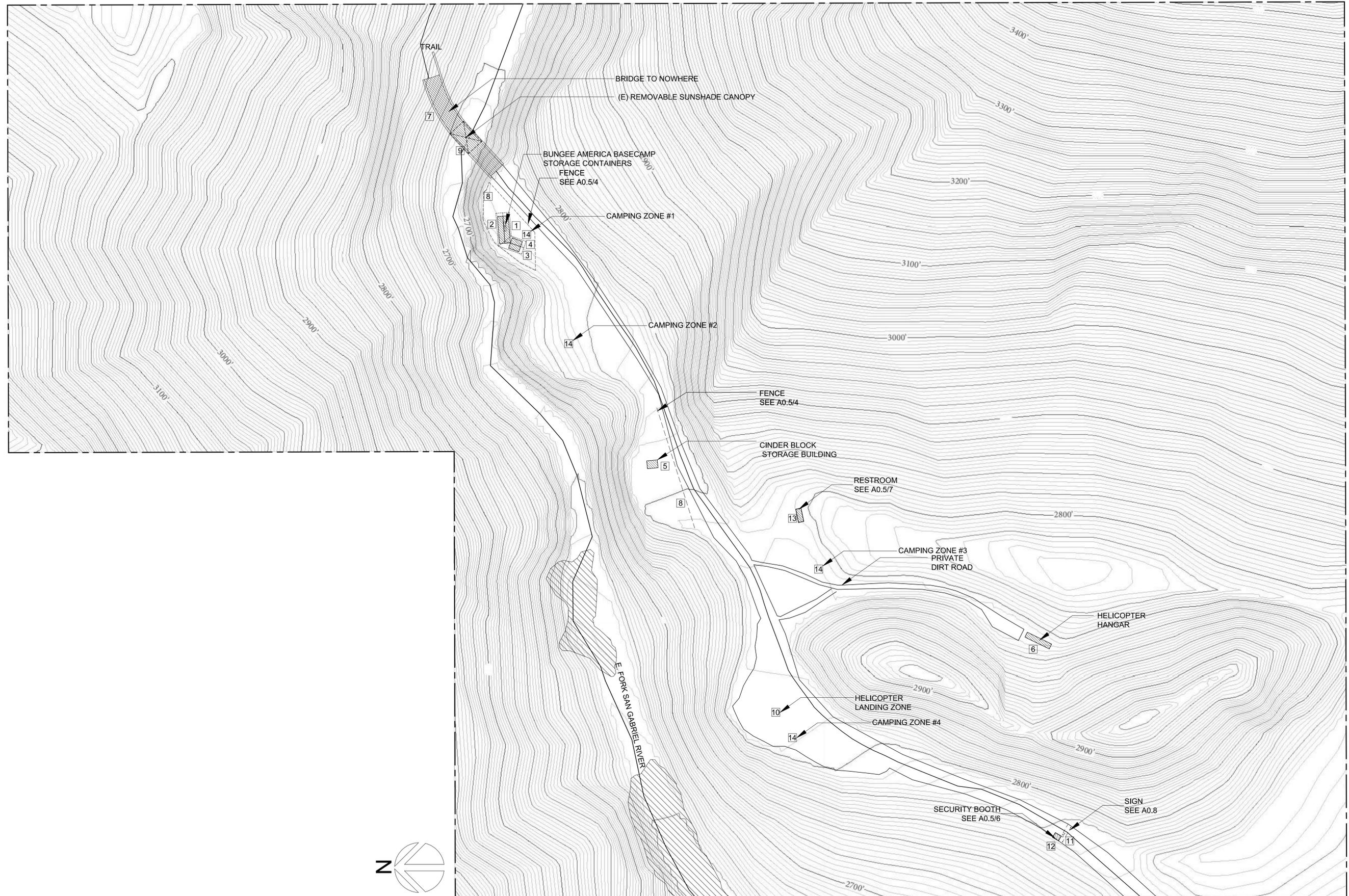
11/08/2018  
 11/01/2023  
 08/19/2024

**A0.3**

NOTE: SEE A0.1/1 FOR LOCATION OF ENLARGED SITE PLAN



**A0.3 ENLARGED SITE PLAN**  
 1 SCALE:  $\frac{1}{32}$ "=1'-0"



- ESTIMATED CDFW JURISDICTION
- 1 STORAGE CONTAINER SEE A0.5/3 & A0.6
- 2 STORAGE CONTAINER SEE A0.5/3 & A0.6
- 3 STORAGE CONTAINER SEE A0.5/2 & A0.6
- 4 STORAGE CONTAINER SEE A0.5/2 & A0.6
- 5 CINDER BLOCK BUILDING SEE A0.5/1
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- 14 CAMPING ZONE

project:  
**HORSESHOE  
 PLACER  
 MINING  
 CLAIMS**

tract: 37  
 apn: 8678-002-008,  
 -009, -010 & -011

owner:  
 saunders mine, llc

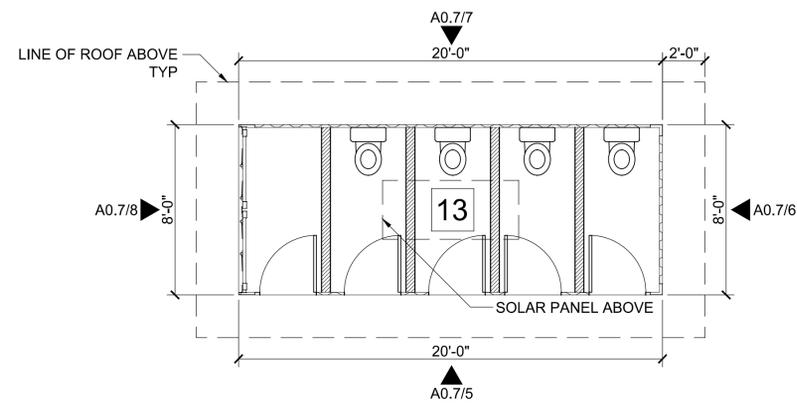
**SITEPLAN**

SCALE: NOT TO SCALE

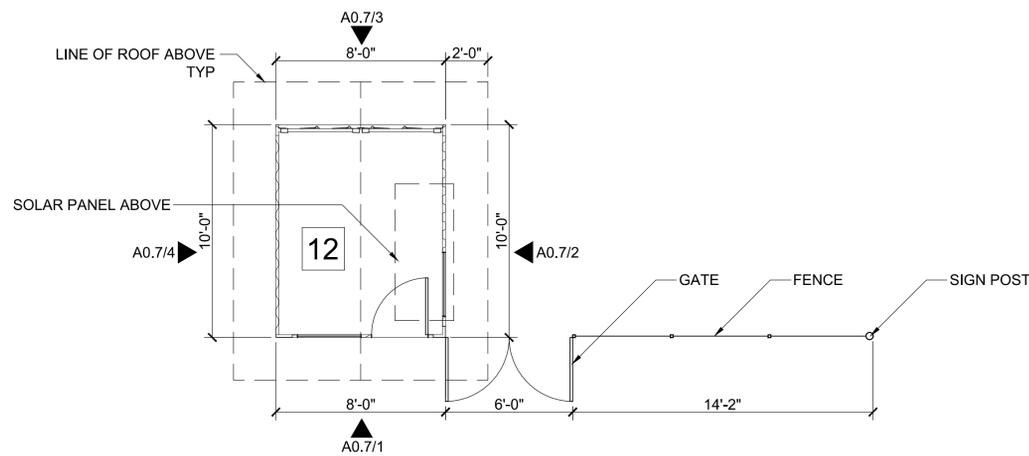
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 08/19/2024

**A0.4**

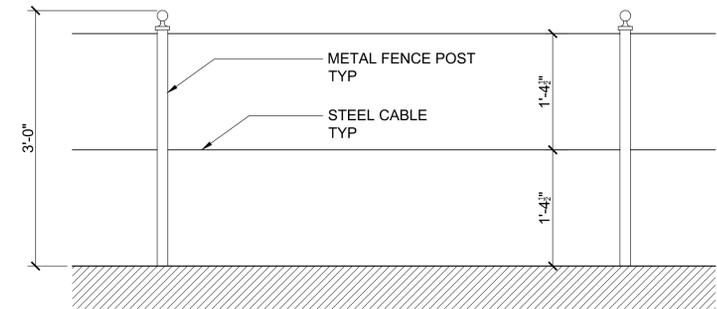
**A0.4 SITE PLAN**  
 1 SCALE: NOT TO SCALE



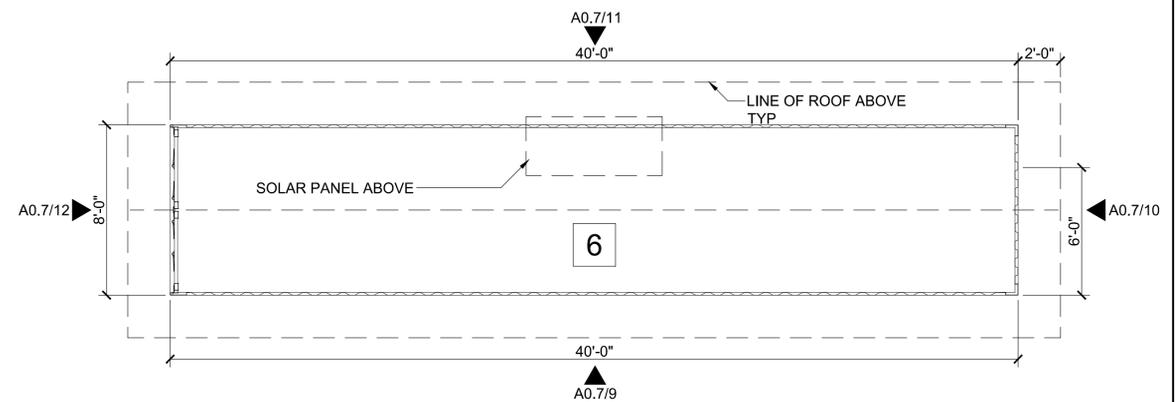
**A0.5 RESTROOM**  
7 SCALE: 1/4"=1'-0"



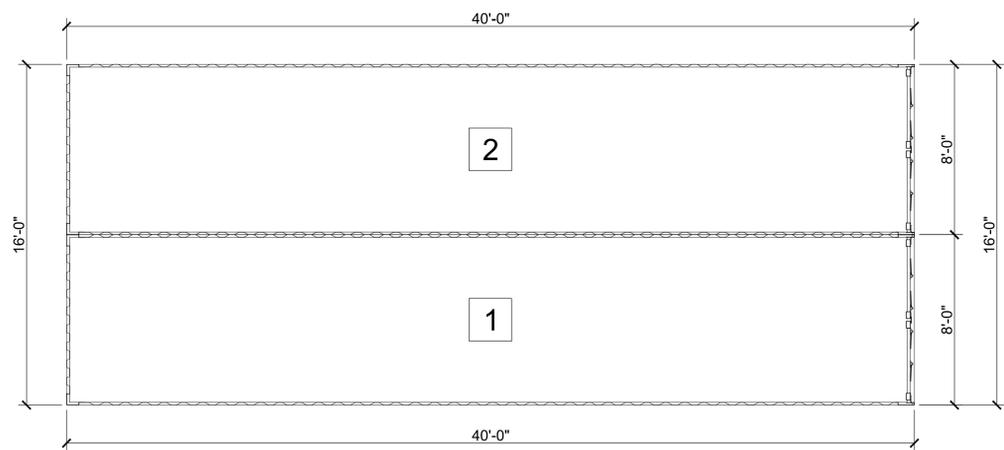
**A0.5 SECURITY BOOTH**  
6 SCALE: 1/4"=1'-0"



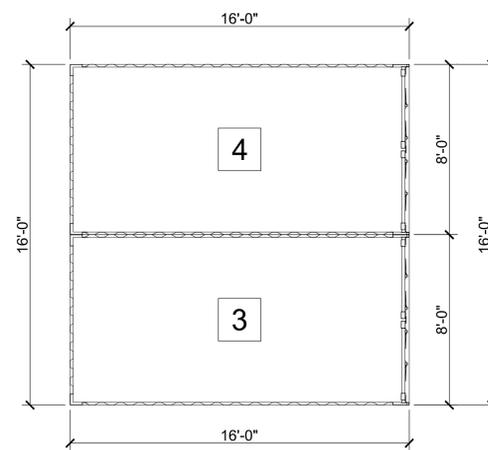
**A0.5 FENCE**  
4 SCALE: 1/4"=1'-0"



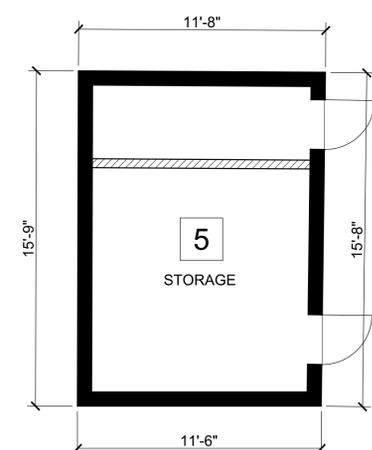
**A0.5 HELICOPTER HANGAR**  
5 SCALE: 1/4"=1'-0"



**A0.5 (E) STORAGE**  
3 SCALE: 1/4"=1'-0"



**A0.5 (E) STORAGE**  
2 SCALE: 1/4"=1'-0"



**A0.5 (E) CINDER BLK. STORAGE BLDG**  
1 SCALE: 1/4"=1'-0"

- 1 STORAGE CONTAINER SEE A0.5/3 & A0.6
- 2 STORAGE CONTAINER SEE A0.5/3 & A0.6
- 3 STORAGE CONTAINER SEE A0.5/2 & A0.6
- 4 STORAGE CONTAINER SEE A0.5/2 & A0.6
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- 13 RESTROOM SEE A0.5/7
- 14 CAMPING ZONE

project:  
**HORSESHOE  
PLACER  
MINING  
CLAIMS**

tract: 37  
apn: 8678-002-008,  
-009, -010 & -011

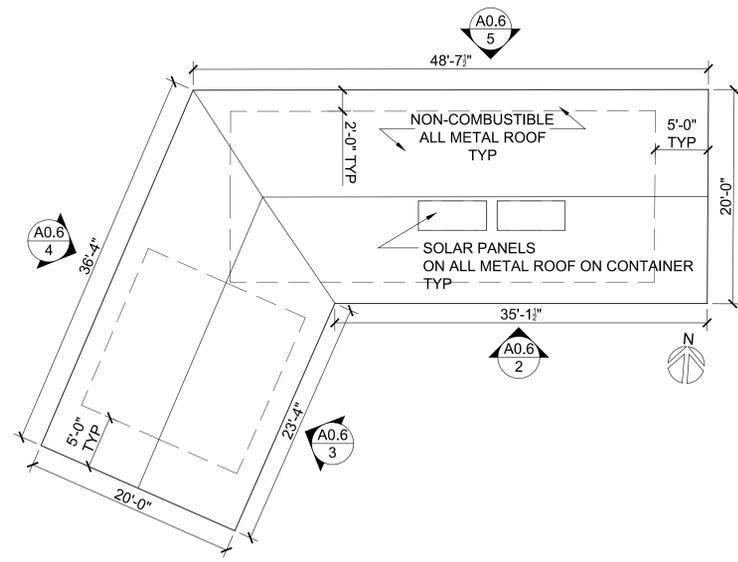
owner:  
saunders mine, llc

**STRUCTURES**

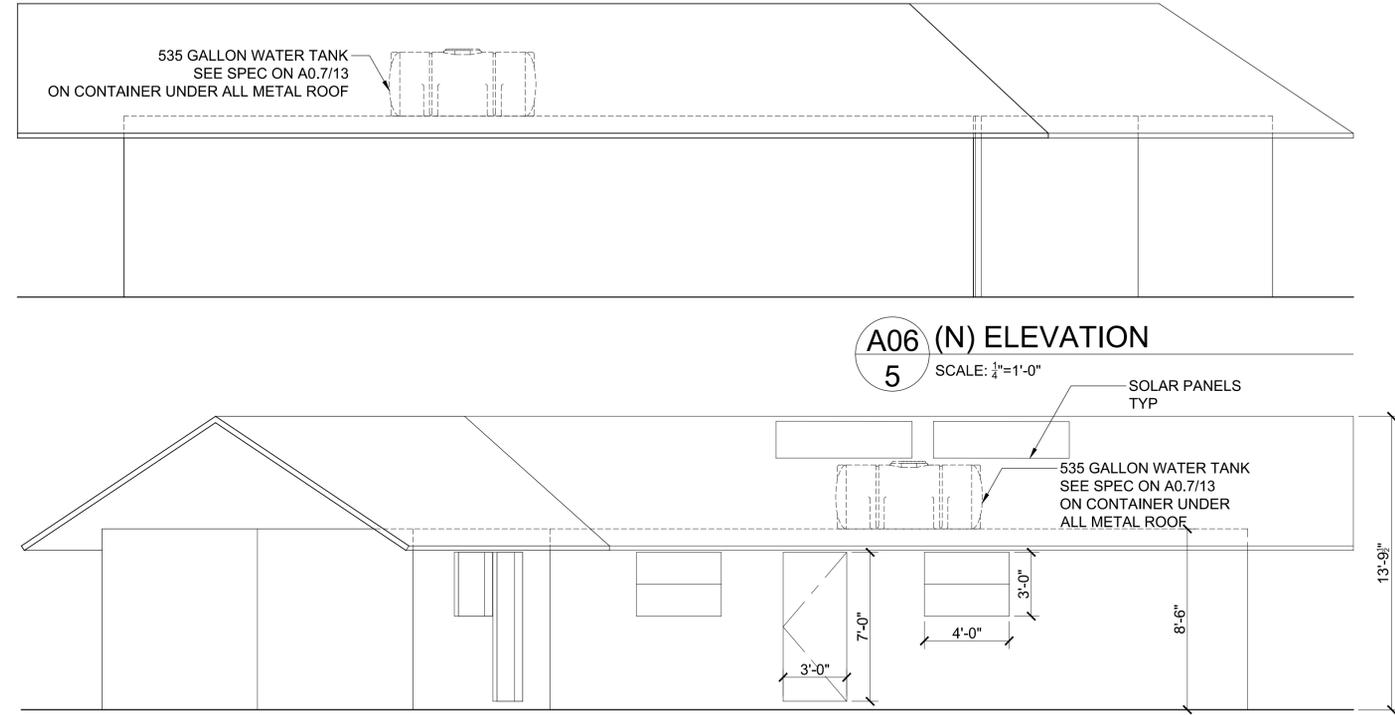
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11/08/2018  
01/30/2019  
12/09/2019  
11/01/2023

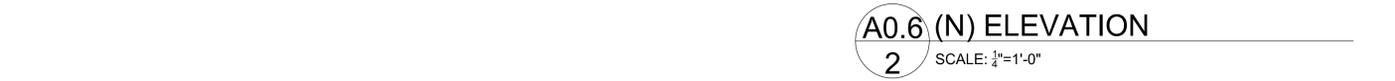
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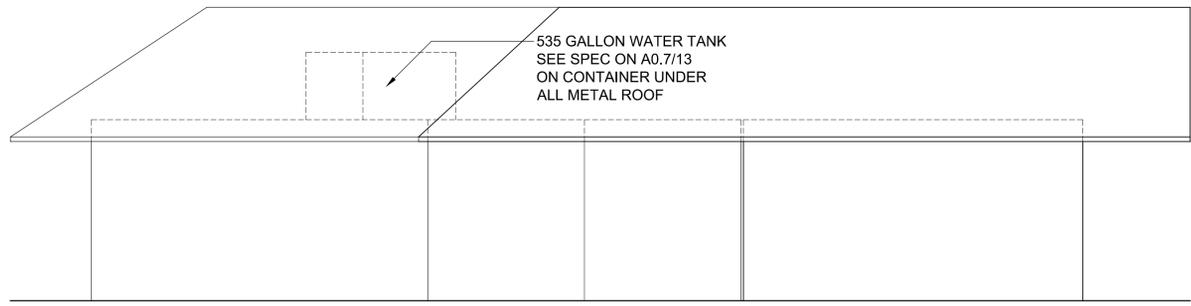
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6 SCALE: 1/4"=1'-0"



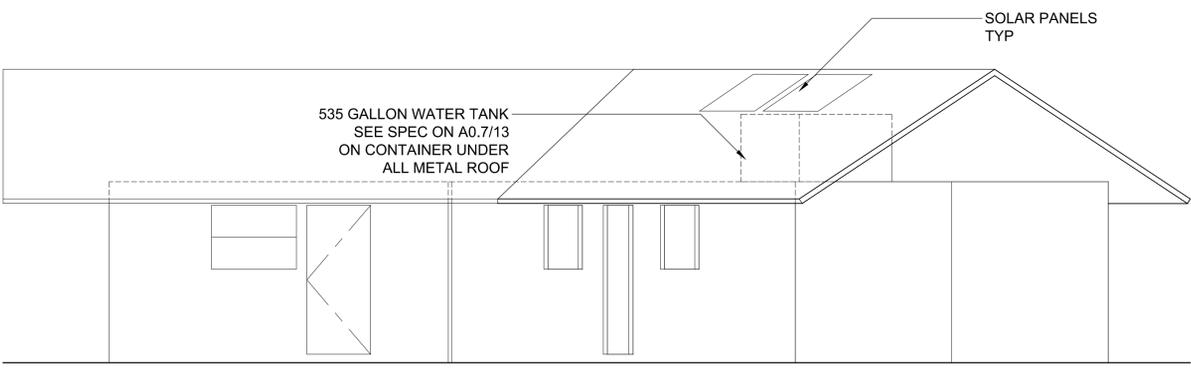
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5 SCALE: 1/4"=1'-0"



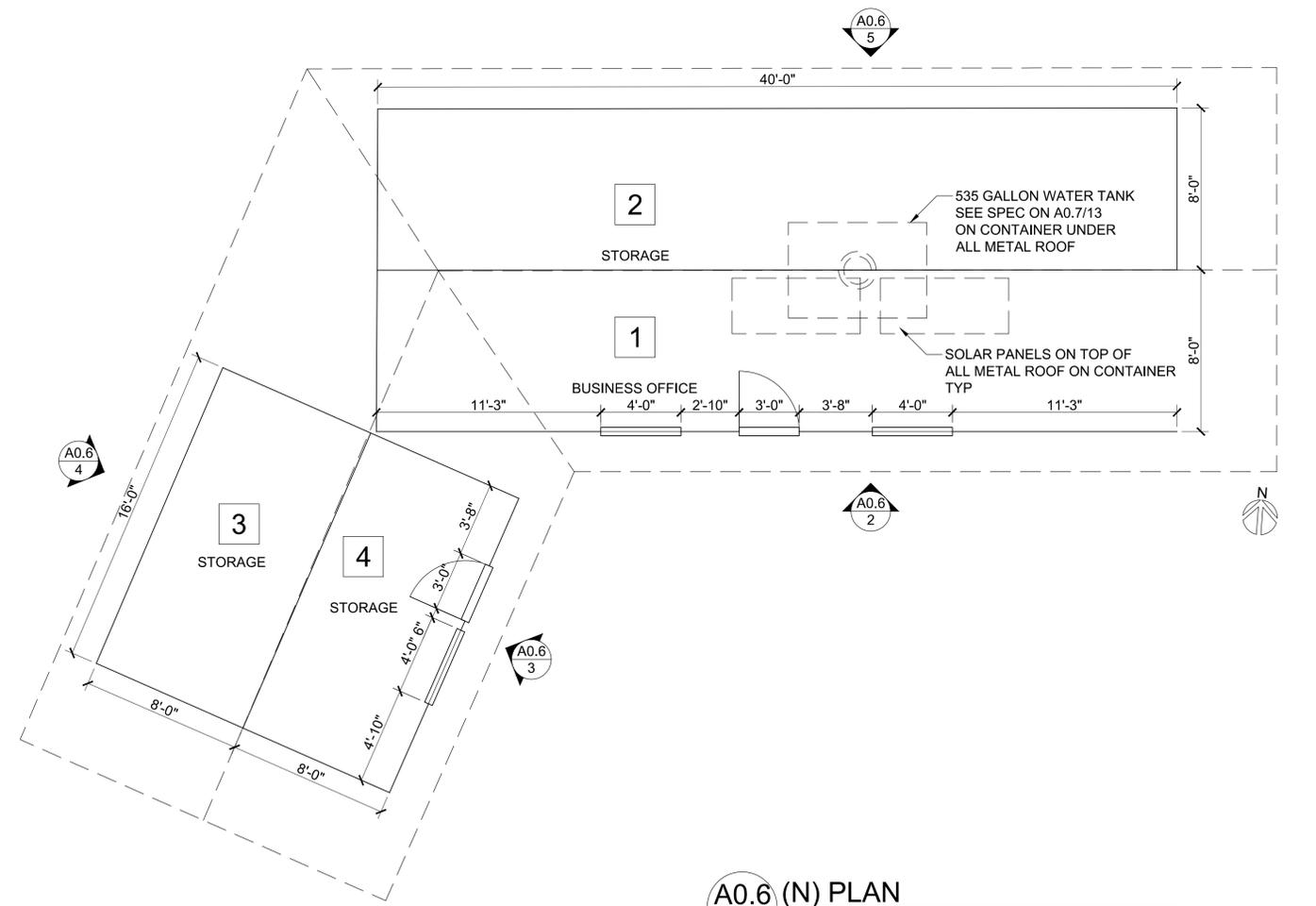
**A0.6 (N) ELEVATION**  
2 SCALE: 1/4"=1'-0"



**A0.6 (N) ELEVATION**  
4 SCALE: 1/4"=1'-0"



**A0.6 (N) ELEVATION**  
3 SCALE: 1/4"=1'-0"



**A0.6 (N) PLAN**  
1 SCALE: 1/4"=1'-0"

- 1 STORAGE CONTAINER SEE A0.5/3 & A0.6
- 2 STORAGE CONTAINER SEE A0.5/3 & A0.6
- 3 STORAGE CONTAINER SEE A0.5/2 & A0.6
- 4 STORAGE CONTAINER SEE A0.5/2 & A0.6
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- 14 CAMPING ZONE

project:  
**HORSESHOE PLACER MINING CLAIMS**  
tract: 37  
apn: 8678-002-008, -009, -010 & -011

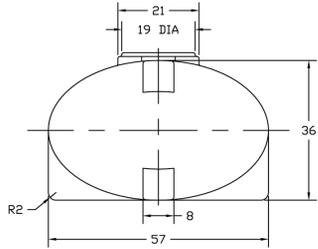
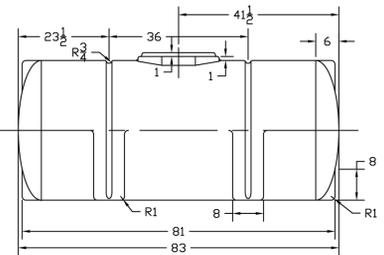
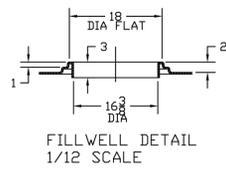
owner:  
saunders mine, llc

**GENERAL STORAGE BUILDINGS**

SCALE: 1/4"=1'-0"

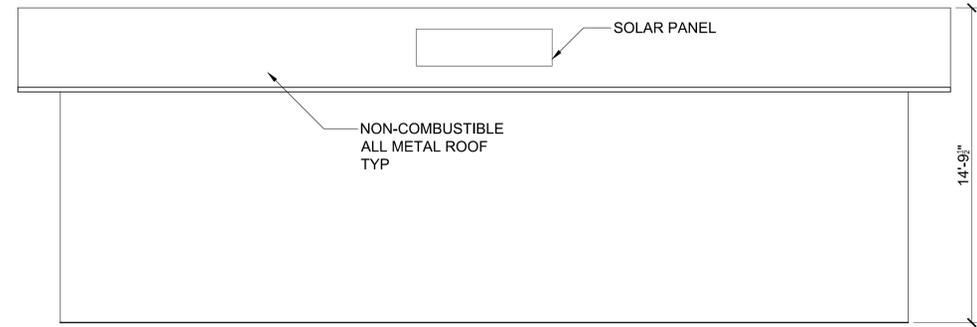
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**A0.6**

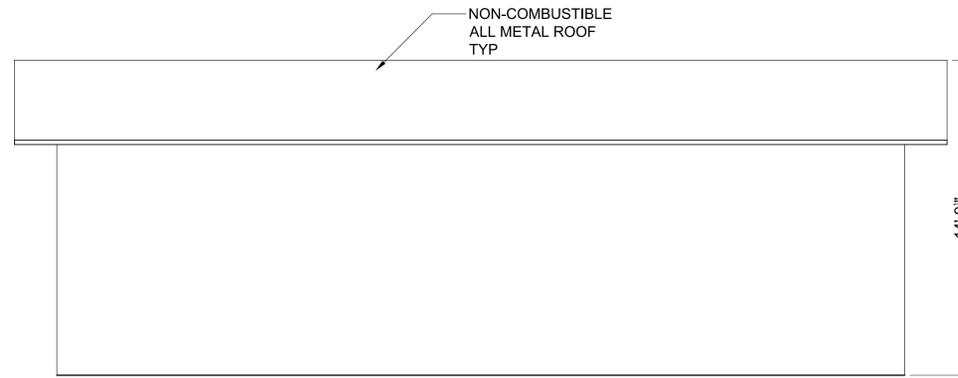


<b>NORWESCO</b>			
ST. BONIFACIUS, MN			
535 GALLON			
ELLIPTICAL LEG TANK			
JTP	23FEB06	SCALE: 1/16	42353
REV	DATE	DESCRIPTION	APPROVED

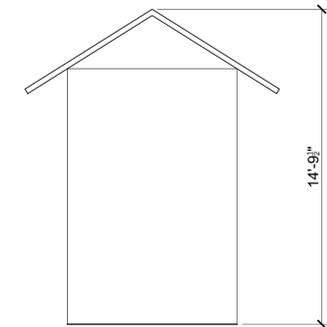
**A0.7 WATER TANK SPEC**  
13 SCALE: N/A



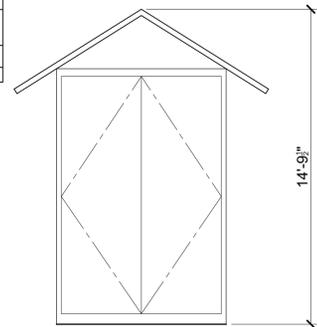
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12 SCALE: 1/4"=1'-0"



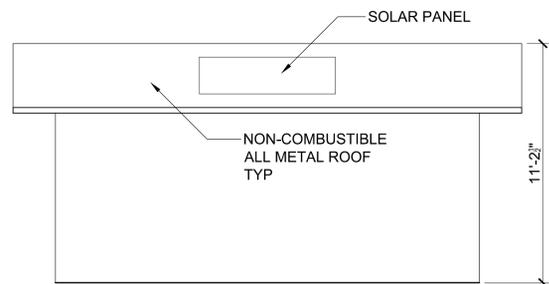
**A0.7 ELEVATION**  
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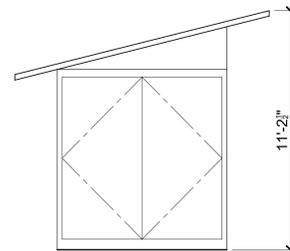
**A0.7 ELEVATION**  
9 SCALE: 1/4"=1'-0"



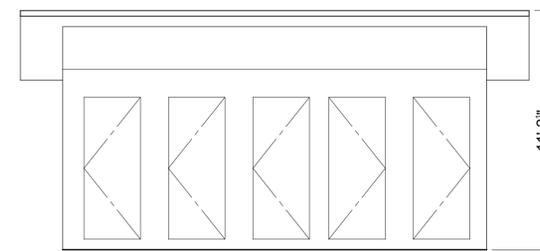
**A0.7 ELEVATION**  
11 SCALE: 1/4"=1'-0"



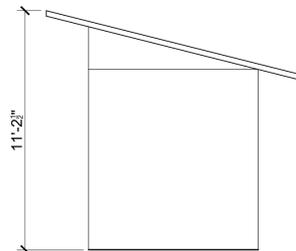
**A0.7 ELEVATION**  
8 SCALE: 1/4"=1'-0"



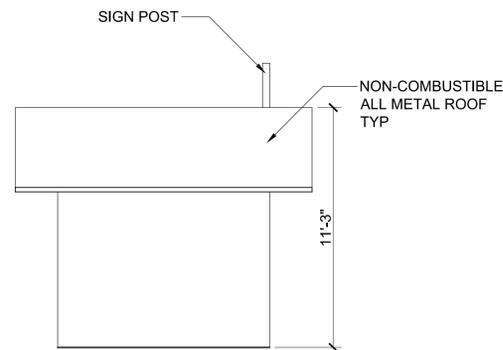
**A0.7 ELEVATION**  
7 SCALE: 1/4"=1'-0"



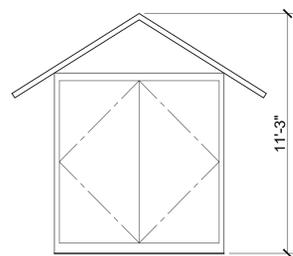
**A0.7 ELEVATION**  
6 SCALE: 1/4"=1'-0"



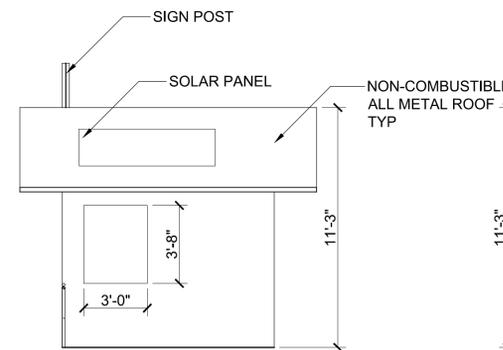
**A0.7 ELEVATION**  
5 SCALE: 1/4"=1'-0"



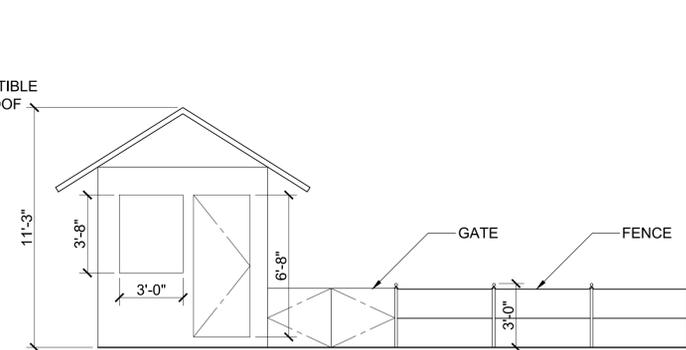
**A0.7 ELEVATION**  
4 SCALE: 1/4"=1'-0"



**A0.7 ELEVATION**  
3 SCALE: 1/4"=1'-0"



**A0.7 ELEVATION**  
2 SCALE: 1/4"=1'-0"



**A0.7 ELEVATION**  
1 SCALE: 1/4"=1'-0"

- 1 STORAGE CONTAINER SEE A0.5/3 & A0.6
- 2 STORAGE CONTAINER SEE A0.5/3 & A0.6
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- 14 CAMPING ZONE

project:  
**HORSESHOE  
PLACER  
MINING  
CLAIMS**

tract: 37  
apn: 8678-002-008,  
-009, -010 & -011

owner:  
saunders mine, llc

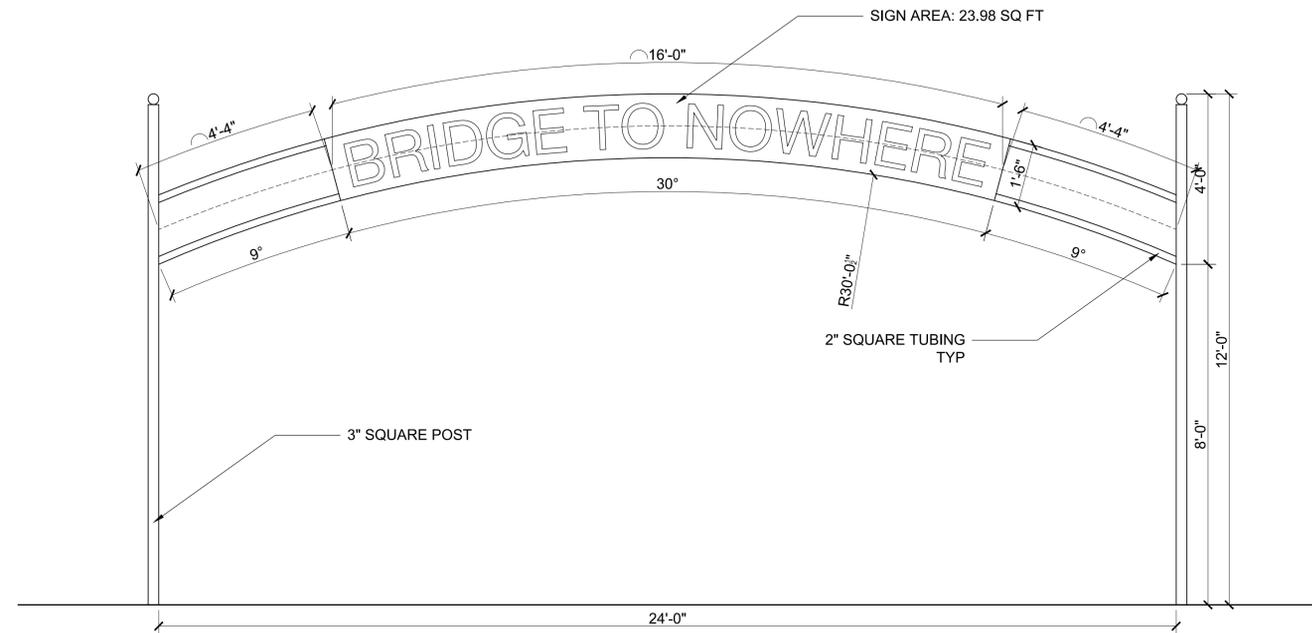
ELEVATIONS

SCALE: 1/4"=1'-0"

11/01/2023

**A0.7**

- 1 STORAGE CONTAINER SEE A0.5/3 & A0.6
- 2 STORAGE CONTAINER SEE A0.5/3 & A0.6
- 3 STORAGE CONTAINER SEE A0.5/2 & A0.6
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project:  
**HORSESHOE  
 PLACER  
 MINING  
 CLAIMS**

tract: 37  
 apn: 8678-002-008,  
 -009, -010 & -011

owner:  
 saunders mine, llc

SIGN

SCALE: 1/4"=1'-0"

08/19/2024

**A0.8 SIGN - ELEVATION**  
 1 SCALE: 1/2"=1'-0"

**A0.8**

**PROJECT NUMBER**

2018-003069-(5)

**HEARING DATE**

September 11, 2024

**REQUESTED ENTITLEMENT(S)**

Conditional Use Permit No. No. RPPL2018004676  
 Variance No. RPPL2018004861

## PROJECT SUMMARY

---

**OWNER / APPLICANT**

Saunders Mine LLC/Bungee America, Inc.

**MAP/EXHIBIT DATE**

August 19, 2024

**PROJECT OVERVIEW**

The applicant, Bungee America, Inc. ("Applicant"), is requesting a Conditional Use Permit ("CUP") to authorize an amusement ride (bungee jumping), a private heliport, and overnight camping with appurtenant facilities (a container used as a hangar to store a helicopter, two storage containers, a storage building, an office, a security booth, a restroom building with composting toilets, a removable shade canopy, a directional/informational sign, and fencing) ("Project") in the C-R (Commercial Recreation) Zone. The Project is categorically exempt (Class 1 - Existing Facilities, Class 3 - New Construction or Conversion of Small Structures, Class 5 - Minor Alterations in Land Use Limitations, and Class 23 - Normal Operations of Facilities for Public Gatherings) pursuant to CEQA reporting requirements.

The Applicant is also requesting a Variance to waive the parking requirements for the Project.

---

**LOCATION**

Assessor's Parcel Numbers 8678-002-015 and 8678-002-016, a private inholding within the Angeles National Forest also known as the Bridge to Nowhere

**ACCESS**

East Fork Trail, a horse riding and hiking trail that starts at the end of Camp Bonita Prairie Forks Road, also known as Camp Bonita Road, which is the nearest public road to the Project Site

---

**ASSESSOR'S PARCEL NUMBERS**

8678-002-015 and 8678-002-016

**SITE AREA**

50 Acres

**GENERAL PLAN / LOCAL PLAN**

Antelope Valley Area Plan

**ZONED DISTRICT**

San Gabriel Watershed

**LAND USE DESIGNATION**

CR (Rural Commercial)

**ZONE**

C-R

**PROPOSED UNITS**

N/A

**MAX DENSITY/UNITS**

N/A

**COMMUNITY STANDARDS DISTRICT**

N/A

**ENVIRONMENTAL DETERMINATION (CEQA)**

Class 1 - Categorical Exemption – Existing Facilities

Class 3 - Categorical Exemption – New Construction or Conversion of Small Structures

Class 5 - Categorical Exemption – Minor Alterations in Land Use Limitations

Class 23 - Categorical Exemption – Normal Operations of Facilities for Public Gatherings

**KEY ISSUES**

- Consistency with the General Plan & Antelope Valley Area Plan
  - Satisfaction of the following Section(s) of Title 22 of the Los Angeles County Code:
    - 22.20.030.C (Land Use Regulations for Commercial Zones)
    - 22.158.050.B (CUP Findings)
    - 22.194.050.B (Variance Findings)
    - 22.80.010 through 22.80.100 (Rural Outdoor Lighting District)
- 

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**LOS ANGELES COUNTY  
DEPARTMENT OF REGIONAL PLANNING  
DRAFT FINDINGS OF THE REGIONAL PLANNING COMMISSION  
AND ORDER**

**PROJECT NO. 2018-003069-(5)  
CONDITIONAL USE PERMIT NO. RPPL2018004676  
VARIANCE NO. RPPL2018004861**

**RECITALS**

1. **HEARING DATE(S).** The Los Angeles County (“County”) Regional Planning Commission (“Commission”) conducted a duly-noticed public hearing in the matter of Conditional Use Permit (“CUP”) No. RPPL2018004676 and Variance No. RPPL2018004861 (“Variance”) on September 11, 2024.
2. **HEARING PROCEEDINGS.** *Reserved.*
3. **ENTITLEMENTS REQUESTED.** The permittee, Bungee America, Inc. (“Permittee”), requests the CUP to authorize an amusement ride (bungee jumping), a private heliport, and overnight camping with appurtenant facilities (a container used as a hangar to store a helicopter, two storage containers, a storage building, an office, a security booth, a restroom building with composting toilets, a removable shade canopy, a directional/informational sign, and fencing) (“Project”) in the C-R (Commercial Recreation) Zone pursuant to County Code Section 22.20.030 (Land Use Regulations for Commercial Zones). The Permittee requests the Variance to waive the parking requirements for the Project pursuant to County Code Section 22.194.020 (Variances – Applicability).

The Project is located on Assessor’s Parcel Numbers (“APNs”) 8678-002-015 and 8678-002-016, which is a private inholding with the Angeles National Forest along the East Fork Trail (“Trail”), also known as the Bridge to Nowhere (“Project Site”). No changes to the existing facilities are proposed except for a new 160-square-foot restroom building with composting toilets to replace the existing outhouse, a new 80-square-foot security booth, new fencing and a new gate, new signage, and new roofs with solar panels on existing structures. The existing outhouse will be converted into a storage structure. The proposed changes to the facilities are minor in scope and would not create any significant new impacts.

4. **PREVIOUS ENTITLEMENTS.** There are no previous County approvals for the existing amusement ride (bungee jumping) and the existing private heliport. The Permittee established a bungee jumping business on the Project Site in 1989 and has operated the existing private heliport as an accessory land use. Since 1993, the applicant has had permits to operate an amusement ride (bungee jumping) at the Project Site issued by the State of California Department of Industrial Relations’ Division of Occupational Safety and Health (“DOSH”). The permits from DOSH are renewed annually. The Federal Aviation Administration (“FAA”) issued a memorandum dated April 15, 2020, approving the private heliport. However, the applicant did not obtain County approval for these land uses.

Certificate of Compliance No. RPPL2018004675 was recorded on September 9, 2019, to certify the legality of the Project Site parcels and to hold them together as one parcel.

5. **LOCATION.** The Project Site consists of APNs 8678-002-015 and 8678-002-016 and is a private inholding with the Angeles National Forest along the Trail, also known as the Bridge to Nowhere. The Project Site is within the San Gabriel Watershed Zoned District and the Antelope Valley Planning Area.
6. **LAND USE DESIGNATION.** The Project Site is located within the CR (Rural Commercial) land use designation of the Antelope Valley Area Plan (“Area Plan”) Land Use Policy Map, a component of the General Plan.
7. **ZONING.** The Project Site is currently zoned C-R. Pursuant to County Code Section 22.20.030.C (Land Use Regulations for Commercial Zones), a CUP is required for an amusement ride and a private heliport in the C-R Zone and a Ministerial Site Plan Review (“SPR”) is required for a campground in the C-R Zone.

**8. SURROUNDING LAND USES AND ZONING**

LOCATION	ANTELOPE VALLEY AREA PLAN LAND USE POLICY	ZONING	EXISTING USES
NORTH	OS-NF (Open Space – National Forest)	W (Watershed)	National Forest
EAST	OS-NF	W	National Forest
SOUTH	OS-NF	W	National Forest
WEST	OS-NF	W	National Forest

**9. PROJECT AND SITE PLAN DESCRIPTION.**

**A. Existing Site Conditions**

The Project Site is 50 gross acres (50 net acres) in size and is one legal parcel that consists of APNs 8678-002-015 and 8678-002-016. Although the Project Site consists of two APNs, Certificate of Compliance No. RPPL2018004675 was recorded on September 9, 2019, which certified the legality of the Project Site parcels and held them together as one parcel. The Project Site is shaped like two connected rectangles with mountainous topography. The western portion of the Project Site is APN 8678-002-015, which is rectangular in shape, 20 acres in area, and has a width from east to west of 660 feet and a length from north to south of 1,320 feet, an area of 20 acres. The eastern portion of the Project Site is APN 8678-002-016, which is rectangular in shape, 30 acres in area, and has a width from east to west of 660 feet and a length from north to south of 1,980 feet. The eastern portion of the Project Site extends 660 feet further north than the western portion. The Project Site is located entirely within a Very High Fire Hazard Severity Zone. Nearly the entire Project Site is in a Hillside Management Area with natural slopes of 25 percent or greater. The Project Site contains the Bridge to Nowhere, an office,

storage containers, a cinder block outhouse, a cargo container used as a helicopter hangar, and a helicopter landing zone.

**B. Site Access**

The Project Site is accessible from the Trail, a horse riding and hiking trail that starts at the end of Camp Bonita Prairie Forks Road, also known as Camp Bonita Road, which is the nearest public road to the Project Site. The Camp Bonita Road public right-of-way is 60 feet wide. The trailhead of the Trail is located at a parking lot on land owned by the United States Forest Service ("USFS") at the end of Camp Bonita Road.

**C. Site Plan**

The site plan depicts the features of the Project Site. The Trail enters the Project Site on the west side. A new 80-square-foot security booth is proposed near the portion of the Trail located on the property, approximately 80 feet from the western lot line and 420 feet from the southern lot line. A gate is proposed next to the security booth on the Trail to identify the access point to the Project Site.

The Trail continues past the security booth to a helicopter landing zone, which is on a relatively flat area approximately 400 feet northeast of the booth. A private dirt road branches off from the Trail and leads to the helicopter hangar, which is a 320-square-foot cargo container located approximately 400 feet south of the Trail. A proposed 160-square-foot restroom building will be located near the junction of the Trail and the private dirt road. It will contain two composting toilets and will replace the existing outhouse. The composting toilets will compost solid human waste on-site and divert urine to a separate holding tank. Liquid waste will be transported off-site for disposal at an approved disposal facility. The restroom building will replace the existing outhouse, which is an approximately 182-square-foot cinder block structure located near the Trail approximately 210 feet north of the proposed restroom building. The existing outhouse will be converted to a storage building.

The Trail continues in a northeasterly direction from the cinder block storage building to the Bridge to Nowhere, which is located in the northeastern portion of the Project Site. The bridge is approximately 170 feet in length and is approximately 70 feet west of the eastern property line. There is a removable canopy structure on the bridge that is approximately 26 feet by 40 feet. An existing 640-square-foot office building made up of two cargo containers is located west of the bridge. Two existing smaller cargo containers used for storage, with a combined area of 256 square feet, are located southwest of the office and adjoin it. A new non-combustible metal roof is proposed over the office and storage area which will connect the office and storage area and will have solar panels. New non-combustible metal roofs with solar panels are also proposed on the existing container used as a hangar, the proposed restroom building, and the proposed security booth.

**D. Parking**

There is no parking provided on the Project Site since it has no road access to accommodate an automobile. The Permittee requested the Variance to waive the parking requirements for the Project because it is not possible to provide parking on the Project Site, providing a new off-site parking lot is not feasible because there are no available parking lots nearby for lease, and there is existing parking available at the trailhead for users of the Angeles National Forest. The trailhead parking lot is on land owned by the USFS at the end of Camp Bonita Road. Parking at this lot and along nearby roadways is permitted with a USFS Adventure Pass. The distance from the trailhead of the Trail to the Project Site is approximately five miles.

- 10. CEQA DETERMINATION.** Prior to the Commission's public hearing on the Project, County Department of Regional Planning ("LA County Planning") staff ("Staff") determined that the Project qualified for Class 1 (Existing Facilities), Class 3 (New Construction or Conversion of Small Structures), Class 5 (Minor Alterations in Land Use Limitations), and Class 23 (Normal Operations of Facilities for Public Gatherings) Categorical Exemptions under State CEQA Guidelines Sections 15301, 15303, 15305, and 15323 and the County Environmental Document Reporting Procedures and Guidelines.

This Project will authorize an existing amusement ride (bungee jumping), a private heliport, and overnight camping with appurtenant facilities (a container used as a hangar to store a helicopter, two storage containers, a storage building, an office, a security booth, a restroom building with composting toilets, a removable shade canopy, a directional/informational sign, and fencing). No changes to the existing facilities are proposed except for a new 160-square-foot restroom building with composting toilets to replace the existing outhouse, a new 80-square-foot security booth, new fencing and a new gate, new signage, and new roofs with solar panels on existing structures. The existing outhouse will be converted into a storage structure. The proposed changes to the facilities are minor in scope and would not create any significant new impacts.

No expansion of the number of visitors is proposed, and the number of visitors will remain within the Project baseline that was based on the applicant's guest logs for the time period of 2013 to 2015. The Project will not have a significant effect on the environment. No development is proposed in a Significant Ecological Area or any other designated environmental resource area. The Project does not result in cumulative impacts, is not near a scenic highway, is not included on a list of hazardous waste sites, does not impact historic resources, and does not result in other significant effects on the environment. Therefore, no exceptions to the Categorical Exemptions mentioned above are applicable and the Project can be considered exempt.

- 11. PUBLIC COMMENTS.** Staff received comments from members of the public regarding the Project between 2016 and 2022. These comments opposed the Director of Regional Planning's ("Director's") approval of a Clean Hands Waiver pursuant to County Code Section 22.02.070 (Application Where Violation Exists) and the

continued operation of the amusement ride (bungee jumping), private heliport, and appurtenant facilities on the Project Site. These comments raised numerous concerns regarding safety, impacts to the environment, sanitation and waste disposal, parking, and the use of a helicopter. Staff received another comment in 2024 opposing the Project due to concerns with waste disposal, trash, traffic, parking, and other concerns.

## **12. AGENCY RECOMMENDATIONS.**

- A. The County Department of Public Works recommended clearance to public hearing with no conditions or comments in a letter dated October 2, 2023.
- B. The County Fire Department recommended clearance to public hearing with conditions in a letter dated January 8, 2024. The Fire Department's recommended conditions have been incorporated into the conditions of Project approval.
- C. County Department of Public Health recommended clearance to public hearing with conditions in a letter dated August 22, 2024. The Department of Public Health's recommended conditions have been incorporated into the conditions of Project approval.
- D. DOSH issued a Certificate of Inspection for Bungee America, which functions as an approval, on December 7, 2023. This Certificate of Inspection was issued after DOSH conducted an inspection of safety-related systems and structural attributes of the amusement ride (bungee jumping) on November 26, 2023. During this inspection, DOSH did not note any deficiencies and determined that the ride complied with their requirements. The DOSH approval expires on October 7, 2025. DOSH has issued Certificates of Inspection for the amusement ride (bungee jumping) since 1993 and inspections are conducted and certificates are renewed on an annual basis.
- E. The FAA issued a memorandum dated April 15, 2020, approving the private heliport. The FAA approval includes a condition to use of a non-obstructing safety barrier to ensure that unauthorized persons are restrained from access to the takeoff/landing area during helicopter flight operations. The FAA's condition has been incorporated into the conditions of Project approval.

**13. LEGAL NOTIFICATION.** Pursuant to County Code Section 22.222.120 (Public Hearing Procedure), the community was properly notified of the public hearing by mail, newspaper (*Antelope Valley Press*), and property posting. Additionally, the Project was noticed and case materials were available on LA County Planning's website. On July 24, 2024, a total of three Notices of Public Hearing were mailed to all property owners as identified on the County Assessor's record within a 1,000-foot radius from the Project Site, as well as two notices to those on the courtesy mailing list for the San Gabriel Watershed Zoned District. Notices were also emailed to four persons who had requested email notification.

### **GENERAL PLAN CONSISTENCY FINDINGS**

14. **LAND USE POLICY.** The Commission finds that the Project is consistent with the Area Plan's Land Use Policy Map. The Project Site is in the CR land use designation. The CR land use designation identifies lands in the planning area that are designated for limited, low-intensity commercial uses that are compatible with rural and agricultural activities. Specific allowable uses are determined by the underlying zoning designation. The C-R Zone allows amusement rides and private heliports with a CUP and allows campgrounds with a Ministerial SPR.

15. **GOALS AND POLICIES.** The Commission finds that the Project is consistent with the goals and policies of the General Plan. The following General Plan policies apply to the Project:

- *General Plan Economic Development Policy ED 1.1:* "Encourage a diverse mix of industries and services in each Planning Area."

The Project is a unique business that has been providing recreational opportunities for the public for approximately 35 years and its continued operation will contribute to the range of services available in the Antelope Valley Planning Area.

- *General Plan Economic Development Policy ED 1.4:* "Encourage the expansion and retention of targeted industries and other growth economic sectors, such as the entertainment industry, aerospace industry, agriculture, transportation/logistics, healthcare, biomed/biotech, hospitality and tourism."

The Project is a recreational business that contributes to tourism in the County, an important economic sector. The continued operation of this existing use, which has operated for approximately 35 years, will promote tourism in the County and contribute to economic activity for the Project and at other businesses in the County which support the visitors using the Project.

16. The Commission finds that the Project is consistent with the goals and policies of the Area Plan. The following Area Plan policy applies to the Project:

- *Area Plan Economic Development Policy ED 1.17:* "Promote uses and activities that rely on the natural state of the environment to take advantage of the vast areas of relatively undisturbed natural areas in the Antelope Valley. These include recreational, tourism and film-making uses."

Bungee America is a small business that has operated on the Project Site for approximately 35 years and is part of the tourism sector, which is an important part of the economy of the County and the Southern California region. The Project promotes activities that rely on the natural environment and contributes to the tourism in the County.

**ZONING CODE CONSISTENCY FINDINGS**

17. **PERMITTED USE IN ZONE.** The Commission finds that the Project is consistent with the C-R zoning classification because an amusement ride and a private heliport are permitted in such zone with a CUP and a campground is permitted in such zone with a Ministerial SPR pursuant to County Code Section 22.20.030.C (Land Use Regulations for Commercial Zones).
18. **C-R ZONE DEVELOPMENT STANDARDS.** The Commission finds that the Project complies with the required C-R Zone Development Standards. Pursuant to County Code Section 22.20.040 (Development Standards for Commercial Zones), there are no required yards, no minimum required landscaping area, and no maximum lot coverage in the C-R Zone. The only development standard listed for the C-R Zone is maximum building height, which is 13 times the buildable area. The Project complies with the maximum building height.
19. **SIGNS.** The Commission finds that the existing signage on the Project Site is consistent with County Code requirements. The Project Site is not allowed to have any wall business signs pursuant to County Code Section 22.114.110 (Wall Business Signs) or any roof or freestanding business signs pursuant to County Code Section 22.114.120 (Roof and Freestanding Business Signs) because it does not have any street frontage. However, it is permitted to have directional or informational signs pursuant to County Code Section 22.114.190 (Directional or Informational Signs). Such directional or informational signs may not exceed 24 square feet in sign area or 12 feet in height. The Project Site contains several existing directional or informational signs to identify the property, to warn against hazards, to provide rules to be followed by visitors to the property, to warn against trespassing in restricted areas, and other information for the public. These existing signs qualify as directional or informational signs and comply with the standards for such signs. The proposed sign near the security booth shown on the Exhibit "A" presented at the public hearing is also classified as a freestanding directional or informational sign, as it identifies the Project Site. The proposed sign complies with the applicable signage standards.
20. **PARKING.** The Commission finds that the Project Site does not meet the minimum requirement for on-site parking pursuant to County Code Section 22.112.070 (Required Parking Spaces). However, a Variance to waive the parking requirement for the Project is justified because of the apparent unique circumstances and physical characteristics of the Project Site pursuant to County Code Section 22.194.050 (Variance Findings).

The Project Site is approximately five miles from the nearest public road, which is Camp Bonita Road. There is a parking lot at the trailhead of the Trail available to hikers of the Trail, which leads from the trailhead to the Project Site. The parking lot at the trailhead at the end of Camp Bonita Road has 33 parking spaces and is on land owned by the USFS. This parking lot is available to hikers of the Trail, which is on USFS land, except for the portion traversing the Project Site, which is owned by the Permittee. There are also additional parking spaces along Camp Bonita Road and

other nearby roadways such as East Fork Road and Glendora Mountain Road. Vehicles using the parking lot and the parking areas along the side of Camp Bonita Road are required to display a USFS Adventure Pass. The Permittee is an authorized vendor of Adventure Passes on behalf of the USFS and has been for decades.

There is no parking requirement specified for amusement rides in County Code Section 22.112.070 (Required Parking Spaces). County Code Section 22.112.070 (Required Parking Spaces – Uses Not Specified) states, “Where parking requirements for any use are not specified, parking shall be provided in an amount that the Director finds adequate to prevent traffic congestion and excessive on-street parking. Whenever practical, such determination shall be based upon the requirements for the most comparable use specified in this Chapter (County Code Chapter 22.12 (Parking)).” Pursuant to County Code Section 22.112.070 (Required Parking Spaces), the parking requirement for places of amusement and entertainment, the most comparable listed land use, is based on a ratio of one parking space per three persons based on the occupant load of all indoor and outdoor areas, with a minimum of 10 spaces for each land use. There is no occupant load for this land use, but the average number of guests per day was used as a substitute to estimate the demand for parking.

The number of Bungee America guests averaged 7,701 per year during the years of 2013 to 2015. During this time period, there were 358 days when the Permittee held bungee jumping tours, with an average of 119 days per year with at least one tour. The average number of guests per day during the years of 2013 to 2015 was 65. The maximum number of guests in one day during the years of 2013 to 2015 was 177 and the highest number on a single tour was 144. The total number of days during the years of 2013 to 2015 with at least 100 guests was 58, while there were only five days during the same period with at least 150 guests.

Based on the average number of guests in a single day of 65 and a ratio of one space per three guests, a minimum of 22 parking spaces would be required. The Commission finds that a Variance to waive the parking requirement for the Project is justified pursuant to County Code Section 22.194.050 (Variance Findings), as explained further in Findings 25 through 28, below, because it is not possible to provide parking spaces on the Project Site, because there is a lack of alternative parking locations, and because the parking areas at the trailhead have been adequate to serve this use in the past.

The conditions of Project approval set limits on the maximum number of guests on a single tour, a single day, a single month, and a single calendar year. The conditions of Project approval also set limits on the number of overnight camping nights that may be conducted during a year, the number of guests allowed per camping night, and the number of camping guests per year. These limits are based on the data provided by the Permittee related to guests during the years of 2013 to 2015, which also established the baseline for the Project’s environmental analysis, as explained in Finding 10, above, and Finding 30, below. The conditions of Project approval require

the Permittee to maintain logs related to all of these limits and to provide them to Staff to ensure compliance with these limits.

Another condition of Project approval requires the Permittee to encourage guests to carpool or rideshare to the trailhead to minimize the number of cars parked in the vicinity of the trailhead. It also requires that the Permittee's website and any other promotional materials related to the Project to include a statement that encourages guests to carpool or rideshare to the trailhead.

21. **INCLUSIONARY UNITS.** The Commission finds that the Project is exempt from the Inclusionary Zoning Ordinance because the Project does not include any housing component.

### **CONDITIONAL USE PERMIT AND VARIANCE FINDINGS**

22. **The Commission finds that the proposed use at the site will not adversely affect the health, peace, comfort, or welfare of persons residing or working in the surrounding area; will not be materially detrimental to the use, enjoyment, or valuation of property of other persons located in the vicinity of the site; and will not jeopardize, endanger, or otherwise constitute a menace to the public health, safety, or general welfare.** The Project Site is in a very remote location, with no residences or places of employment for miles in all directions. Bungee America has an excellent safety record and has not had any known safety incidents since it began operating in 1989. Annual safety inspections are performed by DOSH to ensure that the land use remains safe. Bungee America staff regularly picks up trash along the trail to the Project Site and sponsors trail clean-up events. The Permittee has emergency communications equipment at the Project Site, which provides the ability to communicate in emergency situations in an area otherwise lacking in communication services due to the remote location. The private heliport on the Project Site was approved by the FAA. The helicopter is operated in compliance with FAA requirements and is needed for logistical support required by the Project Site's remoted location, including transport of waste and supplies. The helicopter is not used to transport guests. Helicopter flights are relatively infrequent.
23. **The Commission finds that the proposed site is adequate in size and shape to accommodate the yards, walls, fences, parking and loading facilities, landscaping and other development features prescribed in Title 22, or as is otherwise required in order to integrate said use with the uses in the surrounding area.** The Project Site has an area of 50 acres and there is ample space for all required development features. However, there is no parking provided on the Project Site due to the fact it is located five miles from the nearest public road and is inaccessible by automobiles. The Variance waived the parking requirements for the Project pursuant to Findings 25 through 28, below.
24. **The Commission finds that the proposed site is adequately served by highways or streets of sufficient width and improved as necessary to carry the kind and quantity of traffic such use would generate, and by other public or private service**

**facilities as are required.** The Project Site has no direct vehicular access and is approximately five miles from the nearest public road via the Trail. The trailhead is at the end of Camp Bonita Road, which is a 60-foot-wide County-maintained road that is adequate to serve the users of the Trail. There are limited services available at the Project Site. The Permittee operates a satellite phone with Wi-Fi for emergency communications.

There is currently an outhouse on the Project Site that will be replaced by a new restroom building with composting toilets. The composting toilets would allow for the composting of human solid waste on the Project Site while human liquid waste would be transported off the site by a helicopter. This change will reduce the amount of waste and will dispose the waste in a more efficient and environmentally sensitive way. The conditions of Project approval require periodic evaluations of the composting toilet system by a certified industrial hygienist throughout the grant term to ensure that it is functioning correctly to the satisfaction of the Director. If it is not functioning correctly, the conditions of Project approval require that the operation of the Project must cease until necessary repairs or modifications are made, inspected, and approved by a certified industrial hygienist to the satisfaction of the Director. If necessary, the Director will initiate a modification or revocation of the CUP pursuant to County Code Chapter 22.238 (Modifications and Revocations).

An estimated 20,000 public hikers per year use the Trail to access the Bridge to Nowhere in addition to the approximately 8,000 guests per year who participate in bungee jumping. The Permittee will continue to allow hikers of the public trail to access the Bridge to Nowhere on the Project Site although they are not required to do so, which provides a significant benefit to residents of, and visitors to, the County and the Southern California region who want to access the Bridge to Nowhere.

- 25. The Commission finds that because of special circumstances or exceptional characteristics applicable to the property, the strict application of the County Code deprives such property of privileges enjoyed by other property in the vicinity and under identical zoning classification.** The Project Site has special circumstances and exceptional characteristics that make a Variance necessary for the Project. The Project Site is located well within the boundary of the Angeles National Forest, has no means of vehicular access, and can only be reached using a hiking trail that is approximately five miles in length from the trailhead and Camp Bonita Road, which is the nearest public road. Therefore, the Permittee cannot provide parking spaces on the Project Site.

There is a parking lot on USFS land at the trailhead that is available to the public with the purchase of USFS Adventure Passes from authorized vendors. The Permittee is an authorized vendor of USFS Adventure Passes. Additional parking spaces along Camp Bonita Road are available if all spaces in the parking lot are occupied. USFS Adventure Passes are also required for parking along designated portions of Camp Bonita Road, which is also within USFS land. Although the parking lot and the parking spaces along designated portions of Camp Bonita Road are a five-mile hike in each direction from the Project Site, the Bungee America guests who choose to visit the

Project Site do so with the expectation of a long hike to and from the Project Site and the long hike is an important part of the recreational aspect of the experience and a key component of the Project.

There are no other properties with similar zoning for miles in all directions. There are no other known sites in the County which have similar circumstances to the Project Site.

**26. The Commission finds that the modification authorized will not constitute a grant of special privilege inconsistent with the limitations upon other properties in the vicinity and zone in which the property is situated.** There are no other properties in the vicinity with the same or similar zoning and no other private inholdings nearby. The Project Site is surrounded by USFS land for miles in all directions and has unique circumstances and characteristics that are not found elsewhere in the vicinity. There are no other known land uses in the County with similar circumstances and in a similarly remote location with no vehicular access for miles in all directions.

**27. The Commission finds that strict application of zoning regulations as they apply to such property will result in practical difficulties or unnecessary hardships inconsistent with the general purpose of such regulations and standards.** The Permittee explored alternatives to using the parking lot on USFS land at the trailhead and the parking spaces along designated portions of Camp Bonita Road but none of them were proven feasible. The Permittee contacted the owners of six properties on East Fork Road, the nearest road to Camp Bonita Road, regarding the possibility of providing off-site parking spaces for the Project. However, these locations had no available parking spaces, were not properly zoned for commercial parking, or the owners of these locations were not interested in selling or leasing any areas for parking. The Permittee also explored the possibility of operating a shuttle to provide transportation for guests. However, the shuttle option was found to be infeasible because of the excessive time that would be necessary for guests to wait for the shuttles. Therefore, continuing the current parking arrangement, which includes the parking lot on USFS land at the trailhead and the parking spaces along designated portions of Camp Bonita Road, is the only viable option to provide parking for the Project and ensure its continued operation.

Strict application of the parking requirements for the Project is not possible due to its remote location and physical constraints and would result in practical difficulties or unnecessary hardships inconsistent with the purpose of such standards. There are no feasible alternatives. The Project would be severely impacted because it cannot continue operating without relief from the parking requirements.

**28. The Commission finds that such adjustment will not be materially detrimental to the public health, safety, or general welfare, or to the use, enjoyment, or valuation of property of other persons located in the vicinity.** Bungee America guests have used the parking lot on USFS land at the trailhead and the parking spaces along designated portions of Camp Bonita Road since 1989, and the amount of parking available there has been sufficient to accommodate the Bungee America guests and

other users of the Trail. The conditions of project approval will limit the number of guests for Bungee America to avoid an increase above the baseline levels established during the years of 2013 to 2015. The Permittee's website and any other promotional materials related to the Project must include a statement that encourages guests to carpool or rideshare to the trailhead.

The surrounding properties within a wide radius of the Project Site and the Trail leading to it are on USFS land. The Project will continue operating in largely the same manner as it has for the past approximately 35 years, which would not be detrimental to the use, enjoyment or valuation of other properties or persons in the area. Visitors to the Project Site will be encouraged to carpool to minimize the parking demands at the parking lot on USFS land at the trailhead and the parking spaces along designated portions of Camp Bonita Road. The parking lot on USFS land at the trailhead and the parking spaces along designated portions of Camp Bonita Road will continue to be available to other visitors to the Angeles National Forest and all users of the parking lot and the parking spaces, including visitors to the Project Site, are required to display a USFS Adventure Pass purchased from the USFS or an authorized vendor.

29. The Commission finds that to ensure continued compatibility between the Project and the surrounding land uses, it is necessary to limit the CUP and Variance to a grant term of 20 years.

### **ENVIRONMENTAL FINDINGS**

30. The Commission finds that the Project is exempt from the California Environmental Quality Act pursuant to State CEQA Guidelines sections 15301 (Class 1, Existing Facilities categorical exemption), 15303 (Class 3, New Construction or Conversion of Small Structures categorical exemption), Class 5 (Minor Alterations in Land Use Limitations categorical exemption), and Class 23 (Normal Operations of Facilities for Public Gatherings categorical exemption) and the County Environmental Document Reporting Procedures and Guidelines.

This Project will authorize an existing amusement ride (bungee jumping), a private heliport, and overnight camping with appurtenant facilities (a container used as a hangar to store a helicopter, two storage containers, a storage building, an office, a security booth, a restroom building with composting toilets, a removable shade canopy, a directional/informational sign, and fencing). No changes to the existing facilities are proposed except for a new 160-square-foot restroom building with composting toilets to replace the existing outhouse, a new 80-square-foot security booth, new fencing and a new gate, new signage, and new roofs with solar panels on existing structures. The existing outhouse will be converted into a storage structure. The proposed changes to the facilities are minor in scope and would not create any significant new impacts.

No expansion of the number of visitors is proposed, and the number of visitors will remain within the Project baseline that was based on the applicant's guest logs for the time period of 2013 to 2015. The Project will not have a significant effect on the environment. No development is proposed in a Significant Ecological Area or any

other designated environmental resource area. The Project does not result in cumulative impacts, is not near a scenic highway, is not included on a list of hazardous waste sites, does not impact historic resources, and does not result in other significant effects on the environment. Therefore, the Commission finds that no exceptions to the Categorical Exemptions mentioned above are applicable and the Project is considered exempt.

### **ADMINISTRATIVE FINDINGS**

**31. LOCATION OF DOCUMENTS.** The location of the documents and other materials constituting the record of proceedings upon which the Commission's decision is based in this matter is at LA County Planning, 13th Floor, Hall of Records, 320 West Temple Street, Los Angeles, California 90012. The custodian of such documents and materials shall be the Section Head of the North County Development Services Section, LA County Planning.

### **BASED ON THE FOREGOING, THE COMMISSION CONCLUDES THAT:**

- A. The proposed use, with the conditions of Project approval, will be consistent with the adopted General Plan and Area Plan.
- B. The proposed use at the site will not adversely affect the health, peace, comfort or welfare of persons residing or working in the surrounding area, will not be materially detrimental to the use, enjoyment or valuation of property of other persons located in the vicinity of the site, and will not jeopardize, endanger or otherwise constitute a menace to the public health, safety or general welfare.
- C. The proposed site is adequate in size and shape to accommodate the yards, walls, fences, parking and loading facilities, landscaping and other development features prescribed in Title 22, or as is otherwise required in order to integrate said use with the uses in the surrounding area.
- D. The proposed site is adequately served by highways or streets of sufficient width and improved as necessary to carry the kind and quantity of traffic such use would generate, and by other public or private service facilities as are required.
- E. Because of special circumstances or exceptional characteristics applicable to the property, the strict application of the County Code deprives such property of privileges enjoyed by other property in the vicinity and under identical zoning classification.
- F. The modification authorized will not constitute a grant of special privilege inconsistent with the limitations upon other properties in the vicinity and zone in which the property is situated.
- G. Strict application of zoning regulations as they apply to such property will result in practical difficulties or unnecessary hardships inconsistent with the general purpose of such regulations and standards.

- H. Such adjustment will not be materially detrimental to the public health, safety, or general welfare, or to the use, enjoyment, or valuation of property of other persons located in the vicinity.

**THEREFORE, THE COMMISSION:**

1. Finds that the Project is exempt from the California Environmental Quality Act pursuant to State CEQA Guidelines sections 15301 (Class 1, Existing Facilities categorical exemption), 15303 (Class 3, New Construction or Conversion of Small Structures categorical exemption), 15305 (Class 5, Minor Alterations in Land Use Limitations categorical exemption), and 15323 (Class 23, Normal Operations of Facilities for Public Gatherings categorical exemption); and
2. Approves **CONDITIONAL USE PERMIT NO. RPPL2018004676** and **VARIANCE NO. RPPL2018004861** subject to the attached conditions.

**ACTION DATE: September 11, 2024**

MG:SZD:RWC

August 29, 2024

LOS ANGELES COUNTY  
DEPARTMENT OF REGIONAL PLANNING

DRAFT CONDITIONS OF APPROVAL  
PROJECT NO. 2018-003069-(5)  
CONDITIONAL USE PERMIT NO. RPPL2018004676  
VARIANCE NO. RPPL2018004861

**PROJECT DESCRIPTION**

The project consists of a Conditional Use Permit (“CUP”) to authorize an amusement ride (bungee jumping), a private heliport, and overnight camping with appurtenant facilities (a container used as a hangar to store a helicopter, two storage containers, a storage building, an office, a security booth, a restroom building with composting toilets, a removable shade canopy, a directional/informational sign, and fencing) on a private inholding within the Angeles National Forest along the East Fork Trail, also known as the Bridge to Nowhere, in the C-R (Commercial Recreation) Zone (“Project Site”), and a Variance to waive the on-site parking requirements subject to the following conditions of approval:

**GENERAL CONDITIONS**

1. Unless otherwise apparent from the context, the term “Permittee” shall include the applicant, owner of the property, and any other person, corporation, or other entity making use of this grant.
2. This grant shall not be effective for any purpose until the Permittee, and the owner of the subject property if other than the Permittee, have filed at the office of the Los Angeles County (“County”) Department of Regional Planning (“LA County Planning”) their affidavit stating that they are aware of and agree to accept all of the conditions of this grant, and that the conditions of the grant have been recorded as required by Condition No. 6, and until all required monies have been paid pursuant to Condition No. 9. Notwithstanding the foregoing, this Condition No. 2 and Condition Nos. 3, 4, and 8 shall be effective immediately upon the date of final approval of this grant by the County.
3. The Permittee shall defend, indemnify, and hold harmless the County, its agents, officers, and employees from any claim, action, or proceeding against the County or its agents, officers, or employees to attack, set aside, void, or annul this permit approval, which action is brought within the applicable time period of Government Code section 65009 or any other applicable limitations period. The County shall promptly notify the Permittee of any claim, action, or proceeding and the County shall reasonably cooperate in the defense. If the County fails to promptly notify the Permittee of any claim, action, or proceeding, or if the County fails to cooperate reasonably in the defense, the Permittee shall not thereafter be responsible to defend, indemnify, or hold harmless the County.
4. In the event that any claim, action, or proceeding as described above is filed against the County, the Permittee shall within ten days of the filing make an initial deposit with LA County Planning in the amount of up to \$5,000.00, from which actual costs and expenses shall be billed and deducted for the purpose of defraying the costs or expenses involved in LA County Planning’s cooperation in the defense, including but

not limited to, depositions, testimony, and other assistance provided to Permittee or Permittee's counsel.

If during the litigation process, actual costs or expenses incurred reach 80 percent of the amount on deposit, the Permittee shall deposit additional funds sufficient to bring the balance up to the amount of \$5,000.00. There is no limit to the number of supplemental deposits that may be required prior to completion of the litigation.

At the sole discretion of the Permittee, the amount of an initial or any supplemental deposit may exceed the minimum amounts defined herein. Additionally, the cost for collection and duplication of records and other related documents shall be paid by the Permittee according to County Code Section 2.170.010.

5. If any material provision of this grant is held or declared to be invalid by a court of competent jurisdiction, the permit shall be void and the privileges granted hereunder shall lapse.
6. Prior to the use of this grant, the Permittee, or the owner of the subject property if other than the Permittee, shall **record the terms and conditions** of the grant in the office of the County Registrar-Recorder/County Clerk (i.e. Recorder's Office). In addition, upon any transfer or lease of the property during the term of this grant, the Permittee, or the owner of the subject property if other than the Permittee, shall promptly provide a copy of the grant and its conditions to the transferee or lessee of the subject property.
7. **This grant shall terminate on September 11, 2044.** Entitlement to use of the property thereafter shall be subject to the regulations then in effect. If the Permittee intends to continue operations after such date, regardless of whether the Permittee proposes any modifications to the use at that time, the Permittee shall file a new CUP and Variance application with LA County Planning or shall otherwise comply with the applicable requirements at that time. Such application shall be filed at least twelve (12) months prior to the expiration date of this grant and shall be accompanied by the required fee. In the event that the Permittee seeks to discontinue or otherwise change the use, notice is hereby given that the use of such property may require additional or different permits and would be subject to the then-applicable regulations.
8. This grant shall expire unless used within ninety (90) days from the date of final approval of the grant (by December 26, 2024). A single thirty (30) day time extension may be requested in writing and with the payment of the applicable fee prior to such expiration date. For the purposes of this provision, the continued operation of the amusement ride (bungee jumping) and/or private heliport on the site and satisfaction of Condition No. 2 shall be considered use of this grant.
9. The subject property shall be maintained and operated in full compliance with the conditions of this grant and any law, statute, ordinance, or other regulation applicable to any development or activity on the subject property. Failure of the Permittee to

cease any development or activity not in full compliance shall be a violation of these conditions. No provision of any easement of any other encumbrance on the property shall exempt the Permittee and/or property owner from compliance with these conditions and applicable regulations.

Inspections shall be made to ensure compliance with the conditions of this grant as well as to ensure that any development undertaken on the subject property is in accordance with the approved site plan on file. Given the remote location of the Project Site, at the request of LA County Planning, the Permittee shall provide transportation to and from the Project Site to assist with the completion of these inspections.

The Permittee shall deposit with the County the sum **\$2,205.00**, which shall be placed in a performance fund and be used exclusively to reimburse LA County Planning for all expenses incurred while inspecting the premises to determine the Permittee's compliance with the conditions of this grant. The fund provides for **five (5)** inspections. Inspections may be unannounced. Inspections may be conducted utilizing any available technologies, including, but not limited to, unmanned aircraft systems (UAS). Use of an UAS requires the approval of the Permittee pursuant to LA County Planning's UAS Policy, which may be updated from time to time, and which shall be provided to the Permittee upon request.

If additional inspections are required to ensure compliance with the conditions of this grant, or if any inspection discloses that the subject property is being used in violation of any one of the conditions of this grant, the Permittee shall be financially responsible and shall reimburse LA County Planning for all additional enforcement efforts necessary to bring the subject property into compliance. The amount charged for additional inspections shall be \$441.00 per inspection, or the current recovery cost established by LA County Planning at the time any additional inspections are required, whichever is greater.

10. Notice is hereby given that any person violating a provision of this grant is guilty of a misdemeanor. Notice is further given that the Regional Planning Commission ("Commission") or a Hearing Officer may, after conducting a public hearing, revoke or modify this grant, if the Commission or Hearing Officer finds that these conditions have been violated or that this grant has been exercised so as to be detrimental to the public's health or safety or so as to be a nuisance, or as otherwise authorized pursuant to County Code Chapter 22.238.
11. All development pursuant to this grant must be kept in full compliance with the County Fire Code to the satisfaction of the County Fire Department.
12. All development pursuant to this grant shall conform with the requirements of the County Department of Public Works to the satisfaction of said department.
13. All development pursuant to this grant shall comply with the requirements of Title 22 of the County Code and of the specific zoning of the subject property, unless

specifically modified by this grant, as set forth in these conditions, including the approved Exhibit "A," or a revised Exhibit "A" approved by the Director of Regional Planning ("Director").

14. The Permittee shall maintain the subject property in a neat and orderly fashion. The Permittee shall maintain free of litter all areas of the premises over which the Permittee has control.
15. All structures, walls and fences shall remain free of graffiti or other extraneous markings, drawings, or signage that was not approved by LA County Planning. These shall include any of the above that do not directly relate to the business being operated on the premises or that do not provide pertinent information about said premises. The only exceptions shall be seasonal decorations or signage provided under the auspices of a civic or non-profit organization.

In the event of graffiti or other extraneous markings occurring, the Permittee shall remove or cover said markings, drawings, or signage within 48 hours of such notification, weather permitting. Paint utilized in covering such markings shall be of a color that matches, as closely as possible, the color of the adjacent surfaces.

16. The subject property shall be developed and maintained in substantial conformance with the plans marked Exhibit "A", including the location of the existing heliport all other existing and proposed structures, including but not limited to trails, roads, camping areas, signs, fences, storage containers, canopies, and other features. If changes to any of the plans marked Exhibit "A" are required as a result of instruction given at the public hearing, **one (1) digital copy of a modified Exhibit "A"** shall be submitted to LA County Planning by **November 12, 2024**.
17. In the event that subsequent revisions to the approved Exhibit "A" are submitted, the Permittee shall submit **one (1) digital copy of** the proposed plans to the Director for review and approval. All revised plans must substantially conform to the originally approved Exhibit "A." All revised plans must be accompanied by the written authorization of the property owner(s) and applicable fee for such revision.

#### **PROJECT-SPECIFIC CONDITIONS**

18. This grant shall authorize an amusement ride (bungee jumping), a private heliport, and overnight camping with appurtenant facilities (a container used as a hangar to store a helicopter, two storage containers, a storage building, an office, a security booth, a restroom building with composting toilets, a removable shade canopy, a directional/informational sign, and fencing) on the Project Site without any required on-site parking.
19. No dedicated parking is required for the project.
20. The Permittee shall encourage guests to carpool or rideshare to the trailhead to minimize the number of cars parked in the vicinity of the trailhead of the East Fork

Trail. The Permittee's website and any other promotional materials related to the Project shall include a statement that encourages guests to carpool or rideshare to the trailhead of the East Fork Trail.

21. The total number of guests shall not exceed the following limits: 144 guests on one tour; 177 guests in one day, including overnight guests; 1,186 guests in one month; and 8,437 guests in one calendar year. The Permittee shall maintain logs of the number of guests and the number of bungee jumps for each tour and shall provide them to LA County Planning upon request. The logs shall be maintained in a digital format that can be emailed to LA County Planning.
22. The maximum number camping nights allowed at the Project Site in one calendar year is 13. The maximum number of guests participating in camping nights at the Project Site in one calendar year is 169. The maximum number of guests participating in any single camping night at the Project Site is 22. The Permittee shall maintain logs of all camping nights, including the date of each camping night and the number of guests on each camping night, and shall provide them to LA County Planning upon request. The logs shall be maintained in a digital format that can be emailed to LA County Planning.
23. The Permittee shall comply with all requirements provided in the attached letter issued by the Department of Public Health ("Public Health") dated August 22, 2024.
24. The Permittee shall comply with all conditions provided in the attached letter issued by the County Fire Department ("Fire Department") dated January 8, 2024.
25. The Permittee shall comply with all applicable regulations of the California Department of Transportation Division of Aeronautics and the Federal Aviation Administration ("FAA") for the private heliport, including the condition in the attached FAA memorandum dated April 15, 2020. The heliport shall only function as an accessory use to the amusement ride (bungee jumping) and not as a separate or independent use. The private heliport shall be removed if the amusement ride (bungee jumping) use is discontinued.

**PROJECT-SPECIFIC CONDITIONS: COMPOSTING TOILET SYSTEM**

26. The Permittee shall comply with all requirements related to the composting toilet system required by Condition 28, below, that are provided in the attached letter issued by Public Health dated August 22, 2024, as well as Conditions 27 through 33, below.
27. Within three (3) months of the date of final approval, the Permittee shall select a certified industrial hygienist to assist with the activities required by Conditions 29 through 33, below, and provide information regarding their qualifications, expertise, and experience to the satisfaction of the Director. The Permittee may request a single three (3) month time extension in writing before the initial three (3) month period ends, which the Director may grant. After the Permittee provides the required

information to the satisfaction of the Director, the Director may approve the certified industrial hygienist based on an evaluation of their qualifications, expertise, and experience, and may consult with Public Health, if needed, before making a decision. If the Director does not approve the certified industrial hygienist, the Permittee shall select a different certified industrial hygienist and provide the information required above, and the Director shall conduct the same evaluation described above. If the Director does not approve the other certified industrial hygienist, the process described above shall be repeated until such time that the Director approves a certified industrial hygienist. The process described above shall also be repeated if the Permittee decides to select a different certified industrial hygienist than the one approved by the Director at any time during the grant term. Throughout the grant term, the Permittee shall be responsible for paying all expenses that are incurred by the certified industrial hygienist(s) approved by the Director when they assist with the activities required by Conditions 29 through 33, below.

28. Within six (6) months of the date of final approval, the Permittee shall install a composting toilet system. The Permittee may request a single six (6) month time extension in writing before the initial six (6) month period ends, which the Director may grant.
29. When the composting toilet system is installed, the certified industrial hygienist approved by the Director shall inspect and approve the installation. The certified industrial hygienist shall also determine that it is appropriately sized to meet anticipated demand and otherwise meets the specifications for proper functioning. The certified industrial hygienist shall submit a written report indicating this approval to the Director for future reference.
30. Six (6) months after the composting toilet system is installed, the certified industrial hygienist approved by the Director shall inspect the facility and submit a written report to the Director regarding the facility and whether it continues to meet the specifications for proper functioning.
31. After the inspection required by Condition 30, above, the certified industrial hygienist approved by the Director shall inspect the composting toilet system and submit a written report to the Director regarding the facility and whether it continues to meet the specifications for proper functioning at one year intervals (i.e., eighteen (18) months after the composting toilet system is installed, thirty (30) months after the composting toilet system is installed, etc.).
32. In addition to the inspections required by Condition 31, above, the Director may, at any other time, require the certified industrial hygienist approved by the Director to inspect the composting toilet system and submit a written report to the Director regarding the facility and whether it continues to meet the specifications for proper functioning.
33. If the Director, after reviewing any of the reports required by Conditions 30 through 32, above, and after consulting with Public Health, if needed, determines that the

composting toilet no longer meets the specifications for proper functioning, the Director shall require the Permittee to cease operations until such time that necessary repairs or modifications are made, inspected, and approved by the certified industrial hygienist to the satisfaction of the Director, following consultation with Public Health, if needed. If the Permittee does not comply with this condition, pursuant to Condition 10, above, the Director shall initiate a public hearing before the Commission to consider modification or revocation of this grant pursuant to County Code Chapter 22.238. The Commission may, after conducting the public hearing, revoke or modify this grant if the Commission finds that these conditions have been violated or that this grant has been exercised so as to be detrimental to the public's health or safety or so as to be a nuisance, or as otherwise authorized pursuant to County Code Chapter 22.238.

Attachments:

1. Public Health Letter dated March 2, 2023
2. Fire Department Letter dated January 8, 2024
3. FAA Memorandum dated April 15, 2020

## CONDITIONAL USE PERMIT (CUP) – BURDEN OF PROOF

For over 34-years, the proprietor of Bungee America (Ron Jones) has managed four contiguous parcels of property located on a private inholding within the Sheep Mountain Wilderness Area, Angeles National Forest, San Gabriel Mountains National Monument that includes the “Bridge to Nowhere” property where Bungee America has successfully operated a state-licensed bungee jumping business for over thirty-four years (“Property”), with a sterling safety record.

Bungee America has, for its many years of operation, meaningfully contributed to the general public’s use and enjoyment of the surrounding National Forest by allowing public access to the Property for hiking and recreational purposes. The Bridge to Nowhere, on Bungee America’s private property, is a tremendously popular hiking destination, providing spectacular views and recreational experiences. Hundreds of midweek hikers and thousands of weekend hikers travel across the Property every year to hike to the bridge.

Bungee America seeks a CUP from the County of Los Angeles (“County”) for the following uses: (1) Amusement Ride – Bungee Jumping; (2) Private Heliport; and (3) one- 10 ft; two –16 ft; one – 20ft; and three - 40ft Storage containers (“CUP Uses”).<sup>1</sup> Additional accessory uses include a security booth with signage; bathroom; roof-top mounted solar panels; and security fencing. Bungee America also plans to continue using the Property for overnight camping, hiking, and accessory buildings. These uses are allowed on the Property without a CUP due to the C-R zoning.<sup>2</sup> Bungee America seeks a variance from parking for all the above uses on the Property. The variance burden of proof has been filled out on a separate form included with the CUP application.

The County of Los Angeles shall grant the CUP if Bungee America can fulfill the burdens of proof for each of the three CUP Uses. Bungee America can prove that the requested uses for the Property will not:

### **I. Criteria A:**

- A. Adversely affect the health, peace, comfort or welfare of persons residing or working in the surrounding area, or**
- B. Be materially detrimental to the use, enjoyment or valuation of property of other persons located in the vicinity of the site, or**
- C. Jeopardize, endanger or otherwise constitute a menace to the public health, safety or general welfare.**

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<sup>1</sup> Bungee America/s Property is zoned C-R. These uses are allowed in the C-R zone with a CUP. Los Angeles County Ordinance (“Ordinance”) § 22.28.320 - Uses Subject to a CUP.

<sup>2</sup> These uses are allowed in the C-R zone without a CUP. Ordinance §§ 22.28.290(2), 22.28.300.

## 1. Amusement Ride – Bungee Jumping

- A. Bungee Jumping do not adversely affect the health, peace, comfort or welfare of persons residing or working in the surrounding area.

Bungee America's use of the Property for Bungee Jumping will not adversely affect the health, peace, comfort or welfare of persons residing or working in the surrounding area because the Property is so remote; there is no residential or commercial use within a 6-mile radius of the property. Since no person is residing or working within 100 square miles, Bungee America's use of the Property for bungee jumping will not and cannot adversely affect the health, peace, comfort or welfare of persons residing or working in the surrounding area because there is no one residing or working in the surrounding area. The Property is only accessible by the public via a five-mile hike over a public hiking trail.

- B. Bungee Jumping does not and would not be materially detrimental to the use, enjoyment or valuation of property of other persons located in the vicinity of the site.

Because the Bungee America property is so remote, there is no "property of other persons" within a six miles radius of the subject property, Since there is no private property within more than 100 square miles, the proposed uses will not impact other people or property in the vicinity because there is no "property of other persons located in the vicinity of the site. The surrounding property is United States Forest land that is open and accessible to members of the public that hike through the forest. Therefore, the bungee jumping activities is not materially detrimental to the use, enjoyment, or valuation of property of others person located in the vicinity of the site.

- C. The long-existing bungee jumping use does not jeopardize, endanger or otherwise constitute a menace to the public health, safety or general welfare.

The State of California Amusement Ride Division regulates the safety of Bungee Jumping, including annual inspections. Bungee America has had no safety incidents in its over thirty- four years of operations at the Bridge to Nowhere. Furthermore, Bungee America provides outstanding benefits to the public health, safety, and welfare. The majority of hikers crossing the Property are members of the general public unaffiliated with Bungee America and are provided emergency first aid and emergency satellite phone assistance, if needed. Even hiker's dogs, who routinely injure their paws on the public trail's sharp rocks, are provided aid. Due to the remoteness of the location, there is no cellular phone service available for hours in any direction with the exception of Bungee America's emergency satellite phone, which has been routinely used for members of the public in emergency situations. Bungee America's emergency communication

equipment now includes “Starlink” WI-FI, which adds another layer of emergency satellite connectivity to further benefit the hiking public. Having such a satellite phone at this popular hiking destination is a huge benefit to the public.

Bungee America has a vested interest in keeping the entire five-mile public hiking trail in a trash free condition. In addition to Bungee America staff regularly picking up trash along the five-mile public trail through the forest, they also sponsor several annual trail clean up events. Furthermore, for more than a decade Bungee America has a standing invitation to any groups who pick up trash north of the Bridge to Nowhere, to deliver this trash to Bungee America who will arrange for the trash to be taken out of and disposed of properly.

## **2. Private Heliport**

- A. The helicopter and heliport do not adversely affect the health, peace, comfort or welfare of persons residing or working in the surrounding area.

The subject property is so remote there is no residential or commercial use within a six-mile radius. Because the Property is so remote there is no residential or commercial use within a 6-mile radius of the property. Since no person can be residing or working within 100 square miles, Bungee America’s use of the Heliport will not and cannot adversely affect the health, peace, comfort or welfare of persons residing or working in the surrounding area because there is no one residing or working in the surrounding area. The subject property is only accessible by the public via a five-mile hike over a public hiking trail. Therefore, the helicopter and heliport cannot adversely affect the health, peace, comfort or welfare of persons residing or working in the surrounding area.

- B. The helicopter and heliport are not materially detrimental to the use, enjoyment or valuation of property of other persons located in the vicinity of the site.

Noise from the helicopter is minimal, due to its small sound signature and its relative infrequent use at the Property. The helicopter is typically stored off-site and occasionally stored in the 40-foot container, along with a four-wheeled all-terrain vehicle and tow cart. The helicopter is used infrequently throughout the year and care is used to fly in a manner that does not materially impact the use or enjoyment or valuation of property or persons in the vicinity of the site. Due to the remoteness and 50-acre size of the Property, the only people who may be in the vicinity of the heliport are Bungee America guests or members of the public hiking through the Property. Members of the public may see it only because the Applicant allows public access to the Property. Aside from the aforementioned, The Bungee America property is so remote, there is no “property of other persons” within a six miles radius of the subject property, Since there is no private property within more than 100 square miles, the proposed uses will not impact other people or property in the vicinity because there is no “property of

other persons located in the vicinity of the site". The surrounding property is United States Forest land that is open and accessible to members of the public that hike through the forest.

Therefore, the heliport is not materially detrimental to the use, enjoyment or valuation of property of other persons located in the vicinity of the site.

- C. The helicopter and heliport use do not jeopardize, endanger or otherwise constitute a menace to the public health, safety or general welfare.

The only means of access to the site is by a 10-mile roundtrip hike, or by helicopter. The remoteness of the Property, and its lack of vehicular access, necessitates that all equipment and supplies be carried in and out by staff on their back, or flown into the property by helicopter. Because this is a 10-mile roundtrip hike taking over four hours, it is not feasible for staff to transport thousands of pounds of equipment and supplies on their backs. Therefore, use of a helicopter is essential to deliver supplies to the Property; it is a logistics support vehicle and is not used to transport patrons.

The helicopter is an important factor in Bungee America's environmental stewardship of the area. In addition to transporting equipment and supplies, it is used to remove waste and trash from the Property, including public littering that is collected and disposed of by Bungee America staff. Bungee America employees and customers use a private outhouse on the Property, and all the waste has been sanitarily removed from the canyon for the many years of the business' operations at the Property. The current outhouse will be replaced with up to four composting toilets inside a single 20-foot container. Solid human waste will be composted on site and liquid waste will be flown off by helicopter. This will efficiently and sustainably provide more environmentally sensitive disposal of human waste; further reduce waste; and, increase the general welfare. The helicopter and heliport support the public's health, safety and general welfare.

### **3. Storage Containers**

- A. The storage containers do not adversely affect the health, peace, comfort or welfare of persons residing or working in the surrounding area.

The subject property is so remote there is no residential or commercial use within a six-mile radius. Because the Property is surrounded by forest service land, there is no one residing or working in the surrounding area near the Property. Since no person can be residing or working within 100 square miles, Bungee America's use of the storage containers will not and cannot adversely affect the health, peace, comfort or welfare of persons residing or working in the surrounding area because there is no one residing or working in the surrounding area. The subject property is only accessible by the public via a five-mile hike over a public hiking trail. Therefore, the storage containers cannot adversely

affect the health, peace, comfort or welfare of persons residing or working in the surrounding area.

- B. The storage containers are not materially detrimental to the use, enjoyment or valuation of property of other persons located in the vicinity of the site.

Due to the remote location of the Property, most people never see or know that the storage containers are on the Property. Therefore, the storage containers are not materially detrimental to the use, enjoyment or valuation of property of other persons located in the vicinity of the site. Due to the remoteness and 50-acre size of the Property, the only people who may be in the vicinity of the storage containers are Bungee America guests or members of the public hiking through the Property. Members of the public may see them only because the Applicant allows public access to the Property. Aside from the aforementioned, The Bungee America property is so remote, there is no "property of other persons" within a six miles radius of the subject property and there is no private property within more than 100 square miles, the proposed storage containers will not impact other people or property in the vicinity because there is no "property of other persons located in the vicinity of the site". The surrounding property is United States Forest land that is open and accessible to members of the public that hike through the forest. Therefore, the storage containers are not materially detrimental to the use, enjoyment or valuation "of property of other persons" located in the vicinity of the site.

- C. The storage containers use does not jeopardize, endanger or otherwise constitute a menace to the public health, safety or general welfare.

The storage containers contribute to the public health and safety by securing the bungee jumping equipment from tampering by the thousands of public visitors who cross the Property on their recreational hikes. California amusement ride regulations require that operators securely store all equipment related to the safe operation of their rides. Use of containers is environmentally superior to developing new buildings on the Property to provide storage because the storage containers' footprint is limited; they are recycled from previous use as a shipping container; and are highly fire resistant. Furthermore, the addition of roofs with solar panels on the containers will provide renewable solar energy and increase public health, safety and welfare by keeping the content of the containers cooler environment including heat sensitive bungee equipment, computer-controlled amusement ride systems and emergency communication hardware. While providing renewable solar energy rather than solely using a generator.

## **II. Criteria B**

**That the proposed site is adequate in size and shape to accommodate the yards, walls, fences, parking and loading facilities, landscaping and**

**other development features prescribed in this Title 22, or as is otherwise required in order to integrate said use with the uses in the surrounding area.**

The Property is adequate in size and shape to accommodate all physical structures needed for the CUP Uses and carefully planned for those CUP Uses to integrate seamlessly into the surrounding environment. The Property is remote, open, and isolated. The Property is over 50 acres and the area where the CUP Uses are is large and will not be hindered by physical obstacles. The Commercial Recreational (C-R) zone provides for a comprehensive range of entertainment and amusement activities of a commercial nature. (Zoning Ordinance § 22.28.280.) Sites in Zone C-R may be used for campgrounds and hiking trails, as well as accessory buildings and structures customarily used in conjunction therewith. (*Id.* §§ 22.28.290, 22.28.300.) Bungee Jumping falls within the range of entertainment and amusement activities allowed in the C-R zone, with a CUP. (*Id.* § 22.28.320.)

### **III. Criteria C**

**That the proposed site is adequately served:**

- 1. By highways or streets of sufficient width, and improved as necessary to carry the kind and quantity of pedestrian, bicycle, and vehicle traffic such use would generate; and**
- 2. By other public or private service facilities as are required.**

As noted, the Property is a private inholding surrounded by the Angeles National Forest with no vehicular access to the property. Bungee America's customers use a public hiking trail that is open to the general public as a means of access to the Property. The closest road is Camp Bonita Road, approximately five miles from the Property boundary. Camp Bonita Road is a County of Los Angeles maintained road and is of sufficient width, and improved as necessary to carry the kind and quantity of pedestrian and vehicle traffic Bungee America generates. The US Forest Service's public trail which Bungee America's customers hike over can easily accommodate them as it also supports over 20,000 public hikers a year who visit the Bridge to Nowhere. Bungee America has been operating for over 34-years without incidents related to Camp Bonita Road or the Forest Service hiking trail.

**VARIANCE FINDINGS – BURDEN OF PROOF**  
Bungee America CUP/ RFS No: 14-0002827/EF140610

Bungee America owns four contiguous parcels of property in the Sheep Mountain Wilderness Area, Angeles National Forest, San Gabriel Mountains National Monument that includes the “Bridge to Nowhere” property where Bungee America has successfully operated a state-licensed bungee jumping business for over thirty-four years (“Property”), with a sterling safety record.

Bungee America contributes to the use, enjoyment, and valuation of the surrounding National Forest by allowing public access to the Property for hiking and recreation purposes. The Bridge to Nowhere, on Bungee America’s private property, is a tremendously popular hiking destination. Hundreds of midweek hikers and thousands of weekend hikers travel across the Property every year to hike to the bridge.

Bungee America seeks a CUP from the County of Los Angeles (“County”) for the following uses: (1) Amusement Ride – Bungee Jumping; (2) Private Heliport; and (3) one- 10 ft; two –16 ft; one – 20ft; and three - 40ft Storage containers (“CUP Uses”).<sup>1</sup> Additional accessory uses include a security booth with signage; bathroom; roof-top mounted solar panels; and security fencing. Bungee America also plans to continue using the Property for overnight camping, hiking, and accessory buildings. These uses are allowed on the Property without a CUP due to the C-R zoning.<sup>2</sup> Bungee America seeks a variance from parking for all the above uses on the Property. The variance burden of proof has been filled out on a separate form included with the CUP application.

The County of Los Angeles shall grant the variance if Bungee America can fulfill the burdens of proof. Pursuant to Section 22.194.050 (Findings and Conditions), Bungee America shall substantiate the following:

**B1. Because of special circumstances or exceptional characteristics applicable to the property, the strict application of the County Code deprives such property of privileges enjoyed by other property in the vicinity and under identical zoning classification.**

Bungee America’s situation is exceptionally unique. It is the only private inholding of its size and location in the Angeles National Forest. The remote location of the Property creates the special circumstance for which this variance is necessary: there is no way to access the Property by car. The only access is by a five-mile hike over public land. The surrounding land is part of the public domain and is

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<sup>1</sup> Bungee America/s Property is zoned C-R. These uses are allowed in the C-R zone with a CUP. Los Angeles County Ordinance (“Ordinance”) § 22.28.320 - Uses Subject to a CUP.

<sup>2</sup> These uses are allowed in the C-R zone without a CUP. Ordinance §§ 22.28.290(2), 22.28.300.

managed by the United States Forest Service. Bungee America's guests have been utilizing parking spaces along Camp Bonita Road for over 34-years. As a private landowner and commercial operator, at numerous times throughout Bungee America's existence, Bungee America was provided U.S. Forest Service administrative parking passes for Bungee America employees. For many years Bungee America has also been a vendor for the Forest Service, selling Adventures Passes that allowed their guests, and the public, the ability to pay for their parking at the trailhead and along Camp Bonita Road. Members of the public using the public hiking trail to access Forest Service lands and the Bridge to Nowhere are allowed to park on Camp Bonita Road. Bungee America should not be held to a parking standard they cannot fulfill.

**B2. The modification authorized will not constitute a grant of special privilege inconsistent with the limitations upon other properties in the vicinity and zone in which the property is situated.**

Bungee America's situation is wholly unique because there are no other large inholding property owners in the vicinity. There is no other commercial recreation business in the vicinity whose sole access is from Camp Bonita Road. Bungee America has the right to access its Property from the closest public road, Camp Bonita Road. Under federal law, with regard to inholdings, such access rights do not distinguish between the property owner, and the property owner's economic pursuits. The Alaska National Interest Lands Conservation Act ("ANILCA") section 1110(b) provides that owners of private inholdings have the right to access their property for economic and other interests. Furthermore, Bungee America and its patrons access the Property the same way the public accesses the Property, via public hiking trail. Camp Bonita Road has provided Bungee America access rights via the nearest public road, and accommodated Bungee America's parking needs for the last 34-years. For many of those years the Forest Service recognized and sanctioned their parking by providing them parking passes. Therefore, granting the variance will not create a special privilege inconsistent with limitations upon any other properties in the vicinity, and zone for the Property, because the Property is the only one of its kind.

**B3. Strict application of zoning regulations as they apply to such property will result in practical difficulties or unnecessary hardships inconsistent with the general purpose of such regulations and standards.**

Because of the remote location of the Bungee America Property it is impossible to provide, and therefore impractical to require, on-site parking: there is no way to access the Property by car. Requiring off-site parking has also been explored and it creates an insurmountable hardship.

Bungee America analyzed if there were viable parking alternatives in the surrounding area. Bungee America contacted every property owner within five miles and in every direction of the trailhead parking area along Camp Bonita Road and along the entire length of East Fork Road as far west as State Highway 39. The following property owners were contacted:

1. Camp Williams – Private, 24210 East Fork Rd, Azusa, CA 91702
2. Hudson Bay – Private, 23801 East Fork Rd, Azusa, CA 91702
3. Across street from Hudson Bay –Private, East Fork Rd, Azusa, CA 91702
4. River Community – Private, 23701 East Fork Rd, Azusa, CA 91702
5. Follows Camp / City of Industry, 23400 East Fork Rd, Azusa, CA 91702
6. Burro Canyon Shooting Park – Concessionaire, 22100 East Fork Rd, Azusa, CA 91702

Every property owner either had no available space; was not zoned for commercial parking; or were not interested in selling or leasing any potential areas for parking.

The remoteness of the trailhead from the nearest city, Azusa, CA, precludes any public transit. A private shuttle was considered and evaluated however it was determined to be infeasible. The transit time to operate a shuttle service could typically dictate up to a 2 hour wait between shuttling successive groups of guests. For instance, guests in the first shuttle run would be dropped off at the trailhead and then be forced to wait up to two hours before the shuttle arrived with the rest of the guests. Similarly, guests arriving back at the trailhead after a two hour wait in the morning followed by 10 miles of hiking to and from the Bridge to Nowhere could find themselves waiting another two hours for the next shuttle.

Bungee America cannot obtain access to private off-site parking in the vicinity due to the limited number of privately held properties, and limited interest of those property holders. Bungee America requests the variance, so the Property does not have a parking requirement.

**B4. Such adjustment will not be materially detrimental to the public health, safety, or general welfare, or to the use, enjoyment, or valuation of property of other persons located in the vicinity.**

Parking can be accommodated along Camp Bonita Road with no detriment to public health, safety or welfare because there is adequate parking for all. There are sufficient roadside parking spaces. Bungee America's use is only a small fraction of those spaces. In addition, there are additional public parking spaces in the trailhead parking lot. Bungee America's guests are just like other members of the public. Everyone who parks at the trailhead or along Camp Bonita Road is parking there to use the public hiking trail to access the Bridge to Nowhere.

Since Bungee America has been parking at this location for over 34-years without incident, Bungee America firmly believes there is no material detriment to the public or other property or improvements located in the vicinity.

## PROPOSED ENVIRONMENTAL DETERMINATION

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**DETERMINATION DATE:** August 29, 2024  
**PROJECT NUMBER:** 2018-003069  
**PERMIT NUMBER(S):** Conditional Use Permit No. RPPL2018004676  
 Variance No. RPPL2018004861  
  
**SUPERVISORIAL DISTRICT:** 5  
**PROJECT LOCATION:** East Fork Trail, Angeles National Forest  
**OWNER:** Saunders Mine LLC  
**APPLICANT:** Bungee America, Inc.  
**CASE PLANNER:** Richard Claghorn, Principal Planner  
 rclaghorn@planning.lacounty.gov

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Los Angeles County (“County”) completed an initial review for the above-mentioned Project. Based on examination of the Project proposal and the supporting information included in the application, the County proposes that an Exemption is the appropriate environmental documentation under the California Environmental Quality Act (CEQA). The Project qualifies for Class 1 (Existing Facilities), Class 3 (New Construction or Conversion of Small Structures), Class 5 (Minor Alterations in Land Use Limitations), and Class 23 (Normal Operations of Facilities for Public Gatherings) Categorical Exemptions under State CEQA Guidelines Sections 15301, 15303, 15305, and 15323 and the County Environmental Document Reporting Procedures and Guidelines.

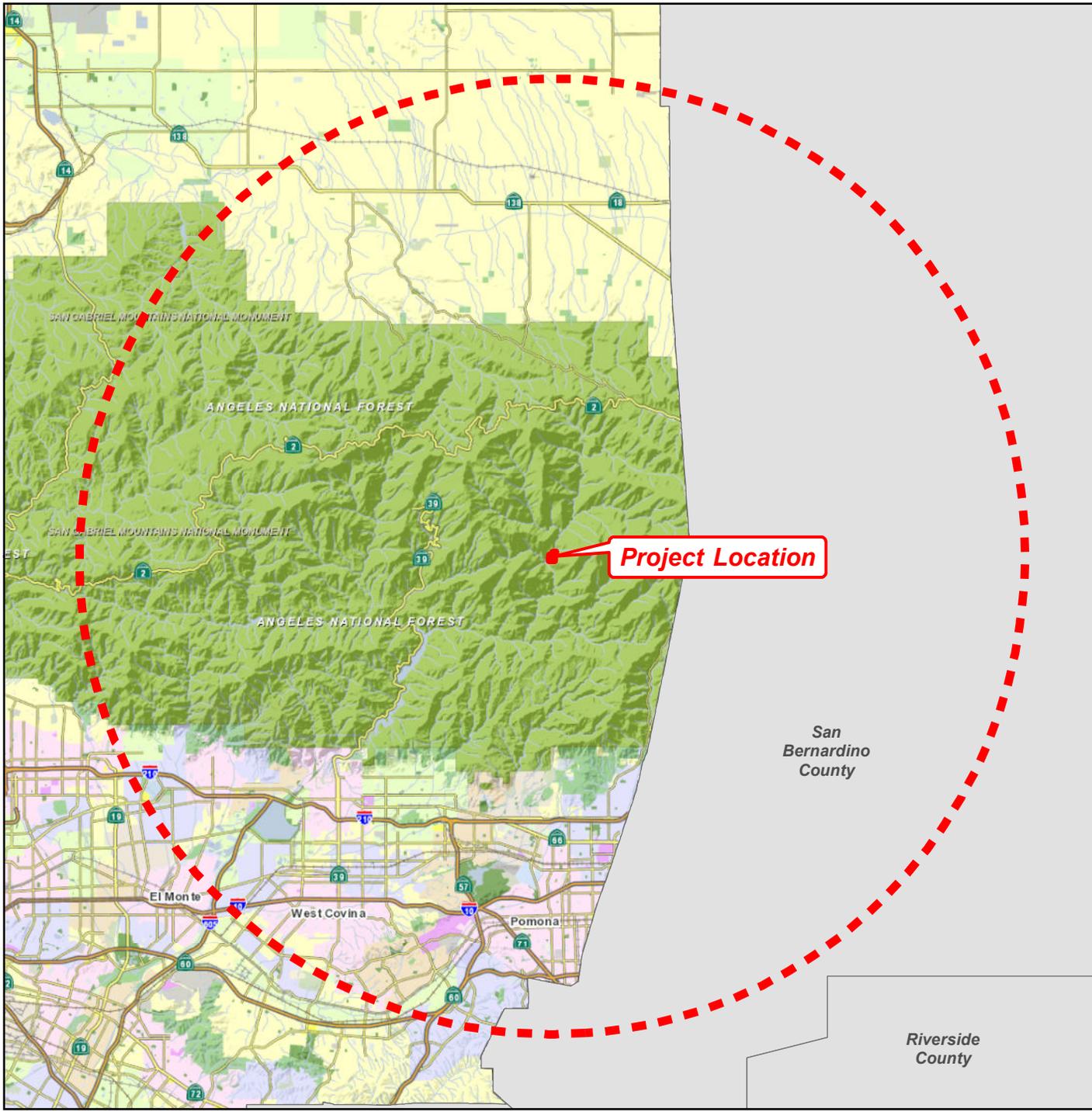
This Project will authorize an existing amusement ride (bungee jumping), a private heliport, and overnight camping with appurtenant facilities (a container used as a hangar to store a helicopter, two storage containers, a storage building, an office, a security booth, a restroom building with composting toilets, a removable shade canopy, a directional/informational sign, and fencing). No changes to the existing facilities are proposed except for a new 160-square-foot restroom building with composting toilets to replace the existing outhouse, a new 80-square-foot security booth, new fencing and a new gate, new signage, and new roofs with solar panels on existing structures. The existing outhouse will be converted into a storage structure. The proposed changes to the facilities are minor in scope and would not create any significant new impacts.

No expansion of the number of visitors is proposed, and the number of visitors will remain within the Project baseline that was based on the applicant’s guest logs for the time period of 2013 to 2015. The Project will not have a significant effect on the environment. No development is proposed in a Significant Ecological Area or any other designated

PROJECT NO. 2018-003069  
CONDITIONAL USE PERMIT NO. RPPL2018004676  
VARIANCE NO. RPPL2018004861

August 29, 2024  
PAGE 2 OF 2

environmental resource area. The Project does not result in cumulative impacts, is not near a scenic highway, is not included on a list of hazardous waste sites, does not impact historic resources, and does not result in other significant effects on the environment. Therefore, no exceptions to the Categorical Exemptions mentioned above are applicable and the Project can be considered exempt..



# 20-MILE RADIUS

## LOCATOR MAP

PROJECT NO. 2018-003069

CUP RPPL2018004676

VAR RPPL2018004861



LOS ANGELES COUNTY  
Dept. of Regional Planning  
320 W. Temple Street  
Los Angeles, CA 90012

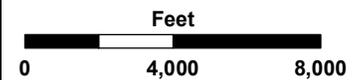
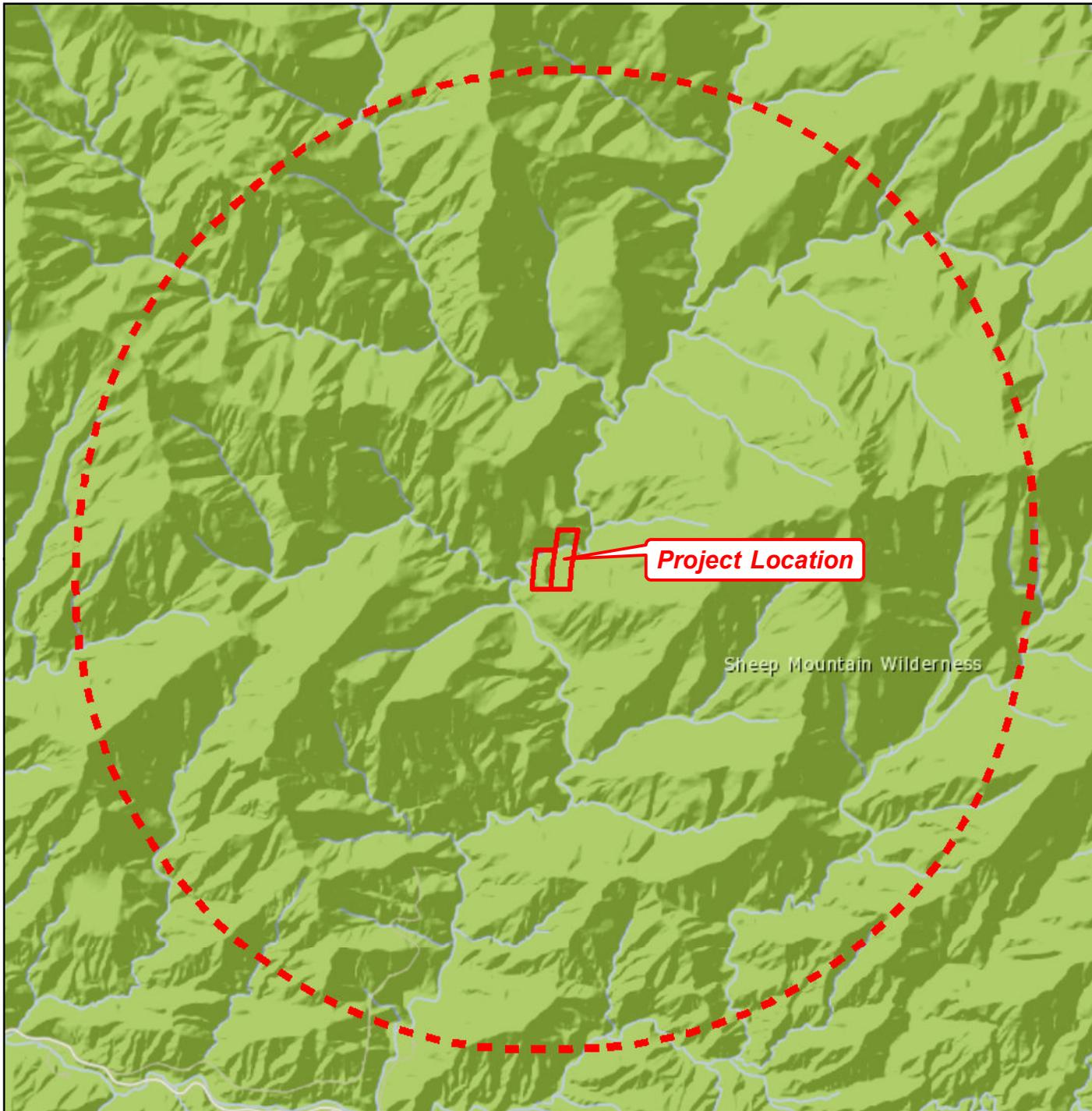
# 3-MILE RADIUS

## LOCATOR MAP

PROJECT NO. 2018-003069

CUP RPPL2018004676

VAR RPPL2018004861



LOS ANGELES COUNTY  
Dept. of Regional Planning  
320 W. Temple Street  
Los Angeles, CA 90012

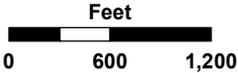
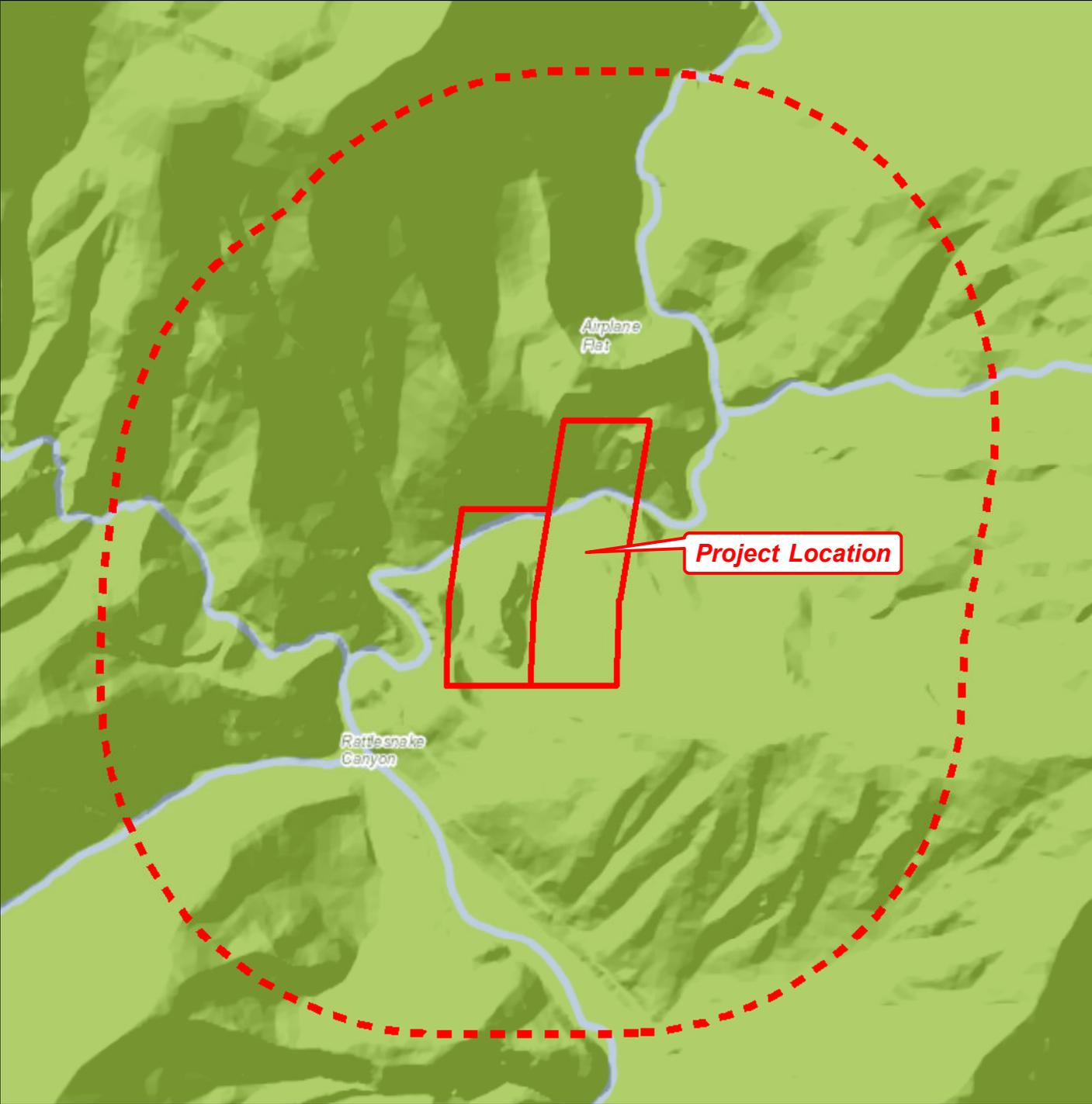
# HALF-MILE RADIUS

## LOCATOR MAP

PROJECT NO. 2018-003069

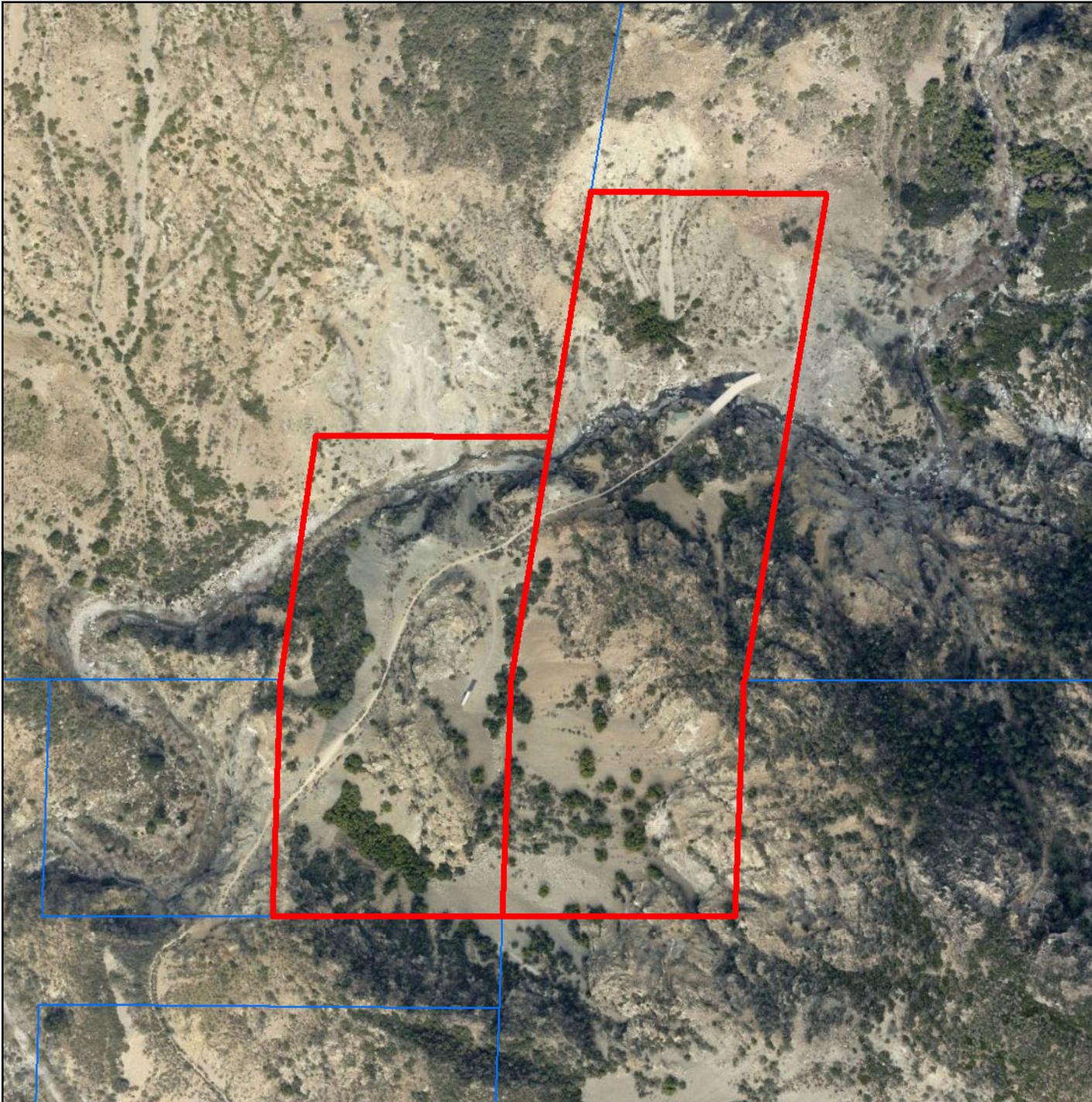
CUP RPPL2018004676

VAR RPPL2018004861



LA COUNTY  
PLANNING

LOS ANGELES COUNTY  
Dept. of Regional Planning  
320 W. Temple Street  
Los Angeles, CA 90012



# AERIAL IMAGERY

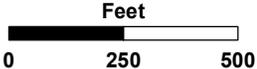
## SITE-SPECIFIC MAP

PROJECT NO. 2018-003069

CUP RPPL2018004676

VAR RPPL2018004861

Digital Ortho Aerial Imagery:  
Los Angeles Region Imagery  
Acquisition Consortium (LARIAC)  
2023



LOS ANGELES COUNTY  
Dept. of Regional Planning  
320 W. Temple Street  
Los Angeles, CA 90012

# LAND USE POLICY

## 500-FOOT RADIUS MAP

PROJECT NO. 2018-003069

CUP RPPL2018004676

VAR RPPL2018004861

*Antelope Valley*

*OS-NF*

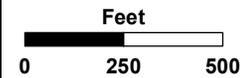
*CR*



CR - Rural Commercial



OS-NF - Open Space National Forest



LA COUNTY  
PLANNING

LOS ANGELES COUNTY  
Dept. of Regional Planning  
320 W. Temple Street  
Los Angeles, CA 90012

# ZONING

## 500-FOOT RADIUS MAP

PROJECT NO. 2018-003069

CUP RPPL2018004676

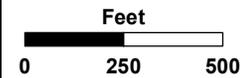
VAR RPPL2018004861

Antelope  
Valley

W

C-R

-  C-R - Commercial Recreation
-  W - Watershed



LA COUNTY  
PLANNING

LOS ANGELES COUNTY  
Dept. of Regional Planning  
320 W. Temple Street  
Los Angeles, CA 90012

EXHIBIT H-PHOTOS



Photo #1-Trailhead parking lot



Photo #2-Trailhead parking lot



EXHIBIT H-PHOTOS



Photo #5-Cargo containers for storage and office



Photo #6-Bridge to Nowhere, looking northeast

EXHIBIT H-PHOTOS



Photo #7-Bridge to Nowhere, looking southwest



Photo #8-Sign at east property line

EXHIBIT H-PHOTOS



Photo #9-Bridge to Nowhere, looking west



Photo #10- Approximate location of proposed restroom

EXHIBIT H-PHOTOS



Photo #11-Helicopter hangar



Photo #12-Road to helicopter hangar

EXHIBIT H-PHOTOS



Photo #13-Helicopter landing area



Photo #14-Approximate location of proposed security booth

EXHIBIT H-PHOTOS



Photo #15- Bridge to Nowhere, with removable canopy, looking east



Photo #16- Helicopter hangar, interior



MARK PESTRELLA, Director

# COUNTY OF LOS ANGELES

## DEPARTMENT OF PUBLIC WORKS

*"To Enrich Lives Through Effective and Caring Service"*

900 SOUTH FREMONT AVENUE  
ALHAMBRA, CALIFORNIA 91803-1331  
Telephone: (626) 458-5100  
<http://dpw.lacounty.gov>

ADDRESS ALL CORRESPONDENCE TO:  
P.O. BOX 1460  
ALHAMBRA, CALIFORNIA 91802-1460

January 30, 2024

IN REPLY PLEASE

REFER TO FILE: **LD-4**

TO: Samuel Dea  
Zoning North Section  
Department of Regional Planning

Attention Richard Claghorn

FROM: James Chon   
Land Development Division

**CONDITIONAL USE PERMIT (RPPL2018004676)  
SAN GABRIEL MOUNTAINS NATIONAL MONUMENT IN HOLDING  
ASSESSOR'S MAP BOOK 8678, PAGE 002, PARCEL 8, 9, 10, 11, 15, AND 16  
UNINCORPORATED SAN GABRIEL CANYON EAST FORK**

As requested, Public Works reviewed the zoning permit application and site plan for the proposed project. The applicant is requesting a Conditional Use Permit to authorize a recreational facility (bungee jumping), private heliport, and placement of five storage containers.

- Public Works has no comments, and this memo will serve as clearance for our review.
- Public Works has comments on the submitted documents; therefore, a Public Hearing shall **NOT** be scheduled until the comments have been addressed.

If you have any questions or require additional information, please contact Ed Gerlits of Public Works, Land Development Division, at (626) 458-4953 or [egerlits@pw.lacounty.gov](mailto:egerlits@pw.lacounty.gov).

DK:la

P:\pub\SUBPCHECK\Plan Checking Files\CUP\RPPL2018004676 - San Gabriel Mountains National Monument Inholding\RPPL2018004676\2023-12-12 Submittal\DPW\_Cleared\_2024-01-30\_RPPL2018004676.docx

COUNTY OF LOS ANGELES • DEPARTMENT OF PUBLIC HEALTH  
ENVIRONMENTAL HEALTH

August 22, 2024

TO: Samuel Dea  
Supervising Regional Planner  
Department of Regional Planning

Attention: Richard Claghorn

FROM: Scott Abbott   
Assistant Director of Environmental Health

**SUBJECT: RPPL2018004676 – SAN GABRIEL MOUNTAINS NATIONAL  
MONUMENT INHOLDING – BUNGEE AMERICA**

The Department of Public Health -Environmental Health Division (Public Health) has reviewed the proposal for using urine-diverting composting toilets at Bungee America, located in a remote wilderness area of the San Gabriel Mountains National Monument Inholding. After carefully considering the request and reviewing the unique aspects of the project, including no road access, an inability to connect to a municipal/public sewer system and potable water supply, and an inability to install a water well and septic system, Public Health will recommend approval for the proposed use of urine-diverting composting toilets with the following conditions to be fulfilled to the satisfaction of Public Health at the permitting stage before the installation of the proposed equipment.

**Condition 1: Onsite Wastewater Treatment System: Wastewater**

- 1.1 Submit plans for the installation and usage of the proposed urine diverting composting toilet. The plans should include manufacturer specifications of all parts and equipment.
- 1.2 Provide Standard Operating Procedure for maintenance on the company letterhead to indicate the following:
  - Personal Protective Equipment required for maintenance.
  - Procedure for cleaning the maintenance equipment.
  - Detailed information on how materials are removed, and the final disposal performed.
  - Waste disposal frequency and amount.
  - Detailed information on the waste collection and disposal process.
  - Waste transportation methods to an approved waste disposal site, including types of cleaning equipment to eliminate accidental spillage of sewage waste.

- 1.3 Obtain permits for all vehicles used to transport waste material from the composting toilets to a disposal location as required by California Health and Safety Code, Sections 117400 – 117450, to the satisfaction of Public Health.

**Condition 2: Hand sanitizing**

- 2.1 Provide adequate supply of alcohol-based hand sanitizer that contains at least 60% alcohol for use on hands.
- 2.2 Ensure that hand sanitizer is maintained and serviced regularly.

Upon issuance of the Conditional Use Permit by the Department of Regional Planning, all required information as stated above must be submitted to Public Health to initiate the approval process.

If you have any other questions or require additional information, please contact Shikari Nakagawa-Ota, Director of the Environmental Protection Branch at (626) 430-5438 or [sota@ph.lacounty.gov](mailto:sota@ph.lacounty.gov).

SA:lm

- c: Shikari Nakagawa-Ota, Director of Environmental Protection Branch  
Liza Frias, Director of Environmental Health



## COUNTY OF LOS ANGELES FIRE DEPARTMENT FIRE PREVENTION DIVISION

Land Development Unit  
5823 Rickenbacker Road  
Commerce, CA 90040  
Telephone (323) 890-4293, Fax (323) 890-9783

EPIC-LA NUMBER: RPPL2018004676                      PROJECT NUMBER: 2018-003069  
CITY/COMMUNITY: Angeles National Forest                      STATUS: Cleared  
PROJECT ADDRESS: San Gabriel Mountains National                      DATE: 01/08/2024  
Monument Inholding

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### CONDITIONS

1. The proposed site plan is cleared for the continued use of regular business operations provided no additional improvements are made to the existing structures. The plans show all accepted modifications to be permitted for construction.
2. Brush clearance may be required during building plan check and inspection. All requirements for brush clearance must be complied with upon identifying violations.

For any questions regarding the report, please contact Joseph Youman at (323) 890-4243 or [joseph.youman@fire.lacounty.gov](mailto:joseph.youman@fire.lacounty.gov).

Reviewed by:

A handwritten signature in black ink, appearing to read "Joseph Youman".

**ZINDER, KOCH & MCBRATNEY**

A PROFESSIONAL LAW CORPORATION  
15455 SAN FERNANDO MISSION BLVD., STE. 409  
MISSION HILLS, CALIFORNIA 91345  
818-760-0100  
FACSIMILE 818-760-0103

**Reply to:**

Paul R. Ayers, Esq.

Writer's Direct E-Mail:  
PAyers@ZinderKoch.com

*Of Counsel*

Paul R. Ayers, Esq.

February 24, 2016

**BY E-TRANSMISSION ONLY**

Richard Buckner, Director  
Los Angeles County Department of Regional Planning  
320 West Temple Street, 13th Floor  
Los Angeles, California 90012

RE: **RFS No: 14-0002827/EF140610-Opposition to Request for Section 22.04.110  
Waiver**  
Our File No.:16-80232

Dear Mr. Buckner:

I am writing you on behalf of my client, Save the East Fork (hereinafter, "SEF"), an unincorporated association dedicated to the preservation and protection of the East Fork of the San Gabriel River (hereinafter, "East Fork"). This letter presents SEF's opposition to Bungee America, Mr. Ron Jones and Saunders Mine, LLC's (hereinafter, collectively "BA") request for a Los Angeles County Planning and Zoning Code Section 22.04.110 waiver (hereinafter, "Clean Hands Waiver") and to urge the Department of Regional Planning (hereinafter, "DRP") to prohibit any activities or storage on the land other than that allowed on vacant land pending completion of the Conditional Use Permit (hereinafter, "CUP") process.

**INTRODUCTION AND FACTUAL BACKGROUND**

This matter involves a parcel of land, identified as AIN 8678-002-009, located on the East Fork approximately 5 miles north of the terminus of East Fork Road (hereinafter "subject property"); title to the subject property is held by Saunders Mine, LLC, a suspended corporation. The subject property is completely surrounded by the Sheep Mountain Wilderness a part of the San Gabriel Mountains National Monument.

In and around 1936, the State of California began building a road up the East Fork; as part of the project a bridge was built across the East Fork on the subject property. In 1938 following

unprecedented rain and flooding, the road project was abandoned; the bridge remained. Since that time the bridge has become known as the “Bridge to Nowhere”. The bridge is located on and comprises a portion of the East Fork Trail; it is both a destination and a means for traveling further into the Wilderness.

At some time prior to 1996, BA began utilizing the bridge for bungee jumping. In 2001 according to a Los Angeles Times article, the State of California discovered the operation and ordered BA to cease operations citing numerous safety issues including lack of permits, inspections and insurance. It was also discovered that Mr. Jones had been operating at the site without the permission of the subject property’s owner, Gale Saunders. Regardless, it appears BA continued its activities at the subject property.

At some time prior to May 2014, the DRP learned of BA’s bungee jumping operation at the bridge. At the time, the subject property was zoned agricultural; amusement activities such as bungee jumping are not permitted on such property. Accordingly, on or around May 8, 2014, the DRP issued violation letters to Saunders Mine, LLC regarding, inter alia, the bungee jumping activity. On August 14, 2014, the DRP, upon the request of BA, issued an extension to correct the violations.

Concurrently, the new Antelope Valley Area Plan was in the process of final revision prior to presentation to the Board of Supervisors. BA persuaded the DRP to include a zoning change in the plan altering the subject property’s designation from agricultural to commercial; a bungee jumping operation could be permitted at a commercial property. The Board gave final approval to the revised Antelope Valley Area Plan including the zoning change for the subject property in June 2015.

On October 28, 2014, in anticipation of the zoning change and with the understanding that even given the change a CUP would be required for continued operation on the subject property, BA, through its attorneys, submitted a request for a Clean Hands Waiver to allow continuation of BA’s activities on the subject property pending completion of the CUP process. While the determination of the request is pending it is DRP’s apparent position that BA’s activities can continue pursuant to the August 14, 2014 extension.

#### **CLEAN HANDS WAIVER STANDARD OF REVIEW**

Los Angeles County Zoning Code section 22.04.110 permits DRP’s Director to allow continuation of operations on a property prior to the issuance of a CUP where “the use in question is consistent with the objectives, goals and policies of the General Plan, or ... is essential or desirable to the public convenience or welfare.” Insofar as SEF is aware, the continuation of a bungee jumping operation at the subject property is unrelated in any way to the “objectives goals and policies” of the relevant general plan. More importantly BA’s activities, far from being “desirable or essential”, imperil public safety and cause environmental damage. As such SEF urges the Director to deny the Clean Hands Waiver and order BA to cease operations on the subject property pending completion of the CUP process.

## **THE DIRECTOR SHOULD NOT GRANT THE CLEAN HANDS WAIVER**

### **A. BA'S OPERATIONS CREATE SEVERE SAFETY RISKS BOTH TO CLIENTS AND EMPLOYEES**

#### **1. BA Does Not Provide For Safe Travel From The Trailhead To The Subject Property**

As indicated above, the bridge used for bungee jumping is 5 miles from the end of East Fork Road; customers of the business, some 50-100 at a time, must walk both ways and ford the East Fork of the San Gabriel River 5 times to get to the site, often unaccompanied by BA staff. Forging the East Fork under any circumstances is risky; it is very dangerous at times of high water; those who balk or are slow get left behind. As a result, volunteers report numerous instances of lost, abandoned or injured BA clientele requiring assistance. It also appears that BA has no swift and high water rescue plan with regard to the dangers involved in the stream crossings.

As if to underline BA's lack of concern for the dangerous conditions to which it exposes clients hiking to the subject property, BA has failed to obtain or even apply for an Outfitter and Guide Permit which is required for commercial travel through Federal Wilderness areas. Since BA clientele must traverse about 3 miles of the Sheep Mountain Wilderness to reach the subject property such a permit is necessary

#### **2. BA's Bungee Jumping Operation At The Subject Property Is Unsafe**

The following safety issues have been observed with regard to BA's operations at the subject property:

**a. The bridge used for the bungee jumping operation is unsafe.** The bridge used for BA's operations was built many years ago; it appears that it has never been tested to see if it is safe for the purpose for which it is being used. Additionally the current railing on the bridge is in disrepair, there are gaps greater than 19 inches in the top rail and the railing is less than 39 inches in height, too low for worker or patron safety.

**b. There is no fall arrest program or procedure for workers at the bridge site.** Numerous witnesses have stated that they have never observed any BA worker use any fall protection when working on or around the bridge; the distance from the bridge to the bottom of the canyon is 120'. It should be noted that in 2010 a BA employee was found dead of blunt force trauma beneath the bridge. Although no official conclusion was drawn and there were no witnesses to the event which apparently happened at night, the most likely cause of death was that he fell off the bridge.

**c. BA fails to properly store flammables and combustibles.** Numerous witnesses have observed improperly stored gasoline, flammables and combustibles at the subject site.

**d. There is no ability to treat or transport individuals injured at the site.** It appears that there is no medic employed by BA onsite during its bungee operations. Although at one time BA had a helicopter available for medical evacuation, the illegal heliport at the subject

property has been ordered closed by the California Department of Transportation ("CDOT"). Accordingly, this option is unavailable.

e. **BA does not provide safety instruction to participants**-Every BA client questioned upon return from the subject property states that they were not given any safety instructions by BA prior to engaging in the bungee jumping activity.

## **B. BA'S ACTIVITIES CAUSE SUBSTANTIAL ENVIRONMENTAL DAMAGE**

**1. BA's Activities Damage And Degrade The Surrounding Sheep Mountain Wilderness.** As indicated above, the subject property is surrounded by the 44,000 acre Sheep Mountain Wilderness Area, a portion of the San Gabriel Mountains National Monument. Pursuant to The Wilderness Act of 1964, federally managed wilderness areas are designated for preservation in their natural condition. The Act defines wilderness as "an area where the earth and community of life are untrammled by man, where man himself is a visitor who does not remain" and "an area of undeveloped Federal land retaining its primeval character and influence, without permanent improvements or human habitation, which is protected and managed so as to preserve its natural conditions." Observations of the effects of BA's operations on the Wilderness and the wilderness experience confirm that said operation is inconsistent with the aims and purposes of a Federal Wilderness. There are numerous, credible reports of discarded food, clothing, garbage, trash and human waste left in the Wilderness by BA clientele traveling to the subject property. The presence of boisterous, rowdy crowds of 50-100 BA customers walking through the Wilderness detracts from the outdoor experience in general and the wilderness experience in particular. Finally, the appropriation of the trailhead parking lot by BA customers deprives other visitors of access to the Wilderness.

**2. BA Does Not Comply With The Permitting Systems Designed To Protect The Wilderness And The Wilderness Experience.** As indicated above, BA refuses to obtain a federally required Outfitter and Guide Permit. This permit not only promotes safe travel but also ensures that the persons involved will not negatively impact the Wilderness. In addition neither BA's employees nor its customers have obtained Wilderness Permits; any individual entering the Sheep Mountain Wilderness must have a Wilderness Permit on their person. Again the purpose of the permit is to control the number and nature of persons entering the wilderness as a means of protecting it.

**3. BA Has Inadequate If Not Illegal Sanitation Facilities At The Subject Property.** It is SEF's understanding that a commercial operation such as is conducted by BA on the subject property requires bathroom facilities. There is an 80 year old outhouse on the site; it is unclear where the generated waste is discharged. In addition, there is a portable toilet at the subject property; apparently waste from this toilet is illegally dumped onsite. It is SEF's belief that waste from both toilets is finding its way directly or indirectly into the East Fork, a violation of both Federal and State law.

**C. BA'S ACTIVITIES AT THE SUBJECT PROPERTY ARE NOT SUSTAINABLE OVER TIME**

**1. Given Its Location Within A Federal Wilderness And National Monument BA's Activities At The Subject Property Will Ultimately Be Terminated.** Based on conversations with San Gabriel National Monument officials and personnel, there is a clear antipathy to BA's operations at the subject site. This antagonism is based on BA's failure to obtain Wilderness Outfitter and Guide Permits and Wilderness Permits, BA's setting of illegal zip lines within Wilderness boundaries, its probable discharge of effluent from sanitary facilities at the subject site into the East Fork and the degradation of the wilderness experience caused by BA clients through their noise, trash and appropriation of the trailhead parking which is owned and under control of the National Monument. As with the DRP, enforcement may be slow in coming but given a cadre of involved and active citizens, enforcement does come; when it does BA's activities at the subject property will become untenable.

**2. A Determination That The Bridge Is A Public Way Will Terminate BA's Activities.** The trail which traverses the subject property, and the bridge which comprises a portion of the trail, are subject to a finding of implied public dedication. Simply put, a trail becomes a public way, with unrestricted public access, if there has been public use of the trail for more than five years at any time prior to 1972. This office has successfully prosecuted three implied public dedication cases in the Altadena area, *Save the Altadena Trails (STAT)* v. *Traylor, et al.*, *STAT v. Cichy* and *STAT v. La Vina Homeowners Assn., et al.* In our opinion, based on public use of the trail and bridge since 1936, an action to find the trail and the bridge a public way has a high probability of success. Orders issued in conjunction with such a determination would almost certainly lead to a prohibition of BA's activities on the bridge as inimical to public access and safety.

**3. BA's Operation Will Fail Due To The Closure Of The Site Heliport.** As BA's attorneys admit in their letter of October 28, 2014, "use of a helicopter is ...essential to [BA's] ability to deliver supplies to the property". CDOT instructed BA to cease use of its illegal heliport in October 2015. Conversations with CDOT officials indicate that the no permit will be issued to allow the heliport to reopen. Without helicopter support BA cannot continue to operate on the subject property.

In addition, loss of the heliport will lead to the revocation of a license necessary for BA's continued operation. BA's bungee jumping activity is licensed by the California Division of Occupational Safety & Health, Amusement Ride Division. Every year a state inspector is required to do an on-site inspection of BA's operation at the subject property. Because of the remote location, the state has required BA to transport the inspector to the site by helicopter. Since BA has been prohibited from landing a helicopter at the subject site, it seems likely that inspections will no longer take place leading ultimately to a revocation of BA's license to operate.

**4. BA's Lack Of Basic Corporate Sustainability Is Emphasized By Its Inability To Fulfill Basic Corporate Requirements.** Less than one year ago all of the corporations associated with Mr. Jones' bungee operation on the subject property were suspended upon the request of the State Franchise Tax Board. Currently, Saunders Mine LLC, the corporation holding title to the subject property, remains suspended. There has been no fictitious name filing by BA, BA does not have a business license and so far as can be determined has made no worker's compensation payments to the Department of Industrial Relations. If BA cannot even fulfill the most basic corporate requirements how can it be expected to run a safe, viable operation on the subject property.

**D. BA DOES NOT NEED TO USE THE SUBJECT PROPERTY TO CONDUCT ITS BUSINESS**

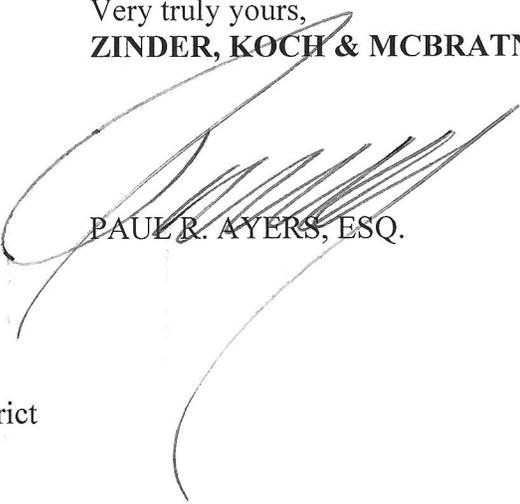
The denial of a Clean Hands Waiver and the termination of its operation at the subject property will not cause BA disproportionate hardship. This business can operate anywhere, hopefully at a location with adequate parking and sanitary facilities and immediate access to emergency medical care. BA's operation can be moved; the surrounding Sheep Mountain Wilderness cannot.

**CONCLUSION**

The DRP is being asked to allow an unsafe, environmentally destructive and marginal business to continue operations at the subject property in an advance of a CUP which almost certainly will never be granted. The request for Clean Hands Waiver should be denied and BA should be ordered to cease operations and correct any conditions on the subject property inconsistent with that allowed on vacant land.

Thank you for your courtesy and consideration

Very truly yours,  
**ZINDER, KOCH & MCBRATNEY**



PAUL R. AYERS, ESQ.

PRA:mef  
cc:  
Congresswoman Judy Chu  
United States 27<sup>th</sup> Congressional District  
Pasadena Office  
527 S. Lake Ave., Suite 106  
Pasadena, CA 91101

February 24, 2016

Page 7

Supervisor Michael D. Antonovich  
Los Angeles County Board of Supervisors  
Downtown Office  
500 West Temple Street, Room 869  
Los Angeles, CA 90012

Mr. Shane Jeffries-Interim Monument Director  
Angeles National Forest-San Gabriel Mountains National Monument  
Angeles National Forest-Supervisor's Office  
701 N. Santa Anita Ave.  
Arcadia, CA 91006-2725

Edel Vizcarra [by e-transmission only]  
Planning and Public Works Deputy  
Supervisor Michael D. Antonovich

Sussy Nemer [by e-transmission only]  
Field Deputy, Pasadena Office  
Supervisor Michael D. Antonovich

## Richard Claghorn

---

**From:** Oscar Gomez  
**Sent:** Monday, April 16, 2018 7:47 AM  
**To:** Jon Sanabria  
**Subject:** FW: Bridge to Nowhere status and parking requirements

FYI.

Oscar A. Gomez  
Supervising Regional Planner  
Zoning Enforcement North  
Los Angeles County Department of Regional Planning  
(213) 974-6483  
(213) 217-5108(Fax)

---

**From:** Steve Kuchenski [mailto:skuchenski@onyxarchitects.com]  
**Sent:** Friday, April 13, 2018 5:53 PM  
**To:** Oscar Gomez <ogomez@planning.lacounty.gov>; Thomas Dearborn <TDearborn@planning.lacounty.gov>  
**Subject:** RE: Bridge to Nowhere status and parking requirements

Oscar, following up on our conversation a couple of days ago, stating there is no further updates on any action on the Clean Hands Waiver for Bungee America / Bridge To Nowhere:

Please do let me know as soon as any further action is contemplated, and please make sure the new director reviews our ongoing concerns about the long-term impact of the county failing to enforce the code as it relates to required parking facilities for Bungee America.

To reiterate my own understanding of the situation:

- Bungee America is an amusement-park type of use on land that is under county planning jurisdiction.
- This amusement park use currently has zero parking provided.
- The amusement park is encouraging its patrons to park on property in an adjacent jurisdiction - the Angeles National Monument (ANM). To my knowledge, they are not an authorized vendor with the Forest Service, nor do they have an agreement with the ANM for parking for a county use.
- This amusement park use has impacted the availability of parking for other who wish to use the ANM. The Bungee America visitors arrive early in the day due to their long hike, and thus they take away available parking from young families that arrive later, for whom a day on the East Fork may be their only affordable opportunity to avoid the summertime heat. This is both an environmental impact and a potential social justice concern.

I understand the Forest Service will release their Angelus National Monument management plan very soon. If that plan does not already include providing parking facilities for a private use that's under county jurisdiction (Bridge to Nowhere) as part of its EIR, I think it is safe to assume Bungee America will need to provide its own shuttle or other such arrangement in order to mitigate their impact.

Further postponement, via inaction or via a Clean Hands Waiver, will not in itself mitigate real public impact of the code violation.

Thanks,

Steve Kuchenski, Principal

**ONYX ARCHITECTS**

316 N. Sierra Madre Blvd.

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F: 626.405.8150

[skuchenski@onyxarchitects.com](mailto:skuchenski@onyxarchitects.com)

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---

**From:** Oscar Gomez [<mailto:ogomez@planning.lacounty.gov>]

**Sent:** Wednesday, April 19, 2017 6:50 PM

**To:** Steve Kuchenski <[skuchenski@onyxarchitects.com](mailto:skuchenski@onyxarchitects.com)>; Thomas Dearborn <[TDearborn@planning.lacounty.gov](mailto:TDearborn@planning.lacounty.gov)>

**Subject:** RE: Bridge to Nowhere status and parking requirements

Steve,

I apologize for the delay. We do not have any new updates. The Director has not made a determination on the clean hands waiver.

If we hear of something, we can let you know.

Oscar A. Gomez

Supervising Regional Planner

Zoning Enforcement North

Los Angeles County Department of Regional Planning

(213) 974-6483

(213) 217-5108(Fax)

---

**From:** Steve Kuchenski [<mailto:skuchenski@onyxarchitects.com>]

**Sent:** Friday, April 14, 2017 3:52 PM

**To:** Thomas Dearborn <[TDearborn@planning.lacounty.gov](mailto:TDearborn@planning.lacounty.gov)>

**Cc:** Oscar Gomez <[ogomez@planning.lacounty.gov](mailto:ogomez@planning.lacounty.gov)>

**Subject:** RE: Bridge to Nowhere status and parking requirements

Thomas, I got an automatic reply from Sabina Roan saying she is no longer with LA County Planning effective 4/13/17. She had been working on the application for the Clean Hands Waiver for Bungee America's "Bridge To Nowhere" at the East Fork San Gabriel River. I am on the Conservation Committee of the Pasadena Casting Club, and we have an ongoing interest in the conservation and recreational use around this river, which has been designated Wild & Scenic for preservation of the coastal rainbow trout. (See the partial email thread below.)

I asked Sabina to keep me updated, but I haven't heard anything from her since last October. Can you give me and update on the Clean Hands Waiver and code enforcement status?

Steve Kuchenski

San Gabriel, CA

---

**From:** Steve Kuchenski

**Sent:** Friday, April 14, 2017 3:37 PM

**To:** 'Sabina Roan'  
**Cc:** Oscar Gomez  
**Subject:** RE: Bridge to Nowhere status and parking requirements

Sabina, has there been any further update on the Clean Hands Waiver request since we last discussed it 6 months ago?

Steve

---

**From:** Sabina Roan [<mailto:SRoan@planning.lacounty.gov>]  
**Sent:** Wednesday, October 05, 2016 8:33 AM  
**To:** Steve Kuchenski  
**Cc:** Oscar Gomez  
**Subject:** RE: Bridge to Nowhere status and parking requirements

Hi Steve,

Thank you for your message. There have been no new developments, but you are on my list to contact when there are updates.

**Sabina Roan**

Planning Assistant II  
Zoning Enforcement North  
Department of Regional Planning  
<http://planning.lacounty.gov>  
Tel. (213) 974-6483 | Fax. (213) 217-5108



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**From:** Steve Kuchenski [<mailto:skuchenski@onyxarchitects.com>]  
**Sent:** Tuesday, October 04, 2016 5:17 PM  
**To:** Sabina Roan <[SRoan@planning.lacounty.gov](mailto:SRoan@planning.lacounty.gov)>  
**Cc:** Oscar Gomez <[ogomez@planning.lacounty.gov](mailto:ogomez@planning.lacounty.gov)>  
**Subject:** RE: Bridge to Nowhere status and parking requirements

Just checking in - - any further updates on the Bridge to Nowhere Clean Hands Waiver request?

Steve Kuchenski  
mobile 626-644-5824

---

**From:** Sabina Roan [<mailto:SRoan@planning.lacounty.gov>]  
**Sent:** Tuesday, July 19, 2016 11:42 AM  
**To:** Steve Kuchenski  
**Cc:** Oscar Gomez  
**Subject:** RE: Bridge to Nowhere status and parking requirements

Steve,

You are correct that the operation would need to obtain a Conditional Use Permit (CUP) to be permitted by the Department of Regional Planning.

In regards to your questions:

- Proof of adequate parking is a requirement of a CUP application. If an applicant fails to show compliance with the parking requirements, the applicant will be required to file for a Parking Permit (PK) requesting less than the required parking and/or for off-site parking. Our planners review every application to ensure it complies with current requirements.
- If the operation is not granted a Clean Hands Waiver and is not covered by an approved CUP, enforcement action will be taken to bring the site into compliance with the County Zoning Code. Our process involves issuance of notices, assessment of noncompliance fees, and, with continued noncompliance, filing of civil or criminal cases. We work with the offices of the Treasurer and Tax Collector, District Attorney, and County Counsel in these cases.

Thank you for your interest. Let me know if I can be of assistance in answering any other questions you may have.

**Sabina Roan**

Planning Assistant II  
Zoning Enforcement North  
Department of Regional Planning  
<http://planning.lacounty.gov>  
Tel. (213) 974-6483 | Fax. (213) 217-5108



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**From:** Steve Kuchenski [<mailto:skuchenski@onyxarchitects.com>]

**Sent:** Tuesday, June 28, 2016 12:13 PM

**To:** Sabina Roan <[SRoan@planning.lacounty.gov](mailto:SRoan@planning.lacounty.gov)>

**Subject:** RE: Bridge to Nowhere status and parking requirements

Sabina, thank you for your response. I have some follow-up questions:

- Prior to a planning application getting submitted to DRP by the owner of Bungee America (BA) -- does DRP have any formal process to evaluate the adequacy of offsite parking at this time?
- Is there anything, other than the threat to enforce DRP sanctions, that would assure the public that BA is compelled to complete such an application for their ongoing use?

If the answer to both questions is "no", then it is all the more reason to withhold a clean hands waiver from Bungee America. If the owner believes that planning code will not be enforced on their site, then there is no incentive or pressure for them to comply with code, or to commence the arduous but necessary process of developing/coordinating a parking solution with various county and federal agencies.

I have a separate but related question: what kind of land use application would you normally anticipate BA to submit in order to continue their (currently unauthorized) use? According to my reading of the code, the bungee operation most closely resembles an amusement ride, which requires a CUP in a C-R zone. Is that correct?

Steve

---

**From:** Sabina Roan [<mailto:SRoan@planning.lacounty.gov>]  
**Sent:** Tuesday, June 28, 2016 9:01 AM  
**To:** Steve Kuchenski  
**Subject:** RE: Bridge to Nowhere status and parking requirements

Steve,

We apologize for the delay in responding to your follow-up questions. Please see responses to your questions below.

A decision regarding the Clean Hands Waiver has not been made. At this moment we are unable to give you a date. However, as soon as we know we will let you know.

You are right in indicating that the Bridge to Nowhere (BTN) is under jurisdiction of the County. However, the parking lot and trails to access BTN are owned by the National Forest. In regards to our reference to National Forest requirements, this pertains to any requirements the National Forest imposes on the use of their lands, in particular the parking lot and trails used by BA to access BTN.

The parking requirements for the Bungee Jump operation are required and will be enforced by the County because as you mentioned BTN is within the unincorporated Los Angeles County. At this moment, the owner of BTN has not conducted a parking study. Additionally, the Department of Regional Planning has not made a determination of the number of required parking spaces. **The required parking is determined once an applicant has submitted an application, required plans, and detailed description of the use.**

The county has not determined the required parking for a campground. Because the zoning code does not specifically mention parking requirements for a camping use, there would be two ways the parking can be calculated for such use. If there is an assembly area, the parking is calculated based on the occupant which is determined by the L.A. County Office of Building and Safety. Current requirements for assembly uses is 1 parking space per each 3 persons based on the occupant load, i.e. 30 person occupant load=10 parking spaces.

Where parking requirements are not specifically mentioned, the zoning code provides that the Director shall determine the required parking adequate to prevent traffic congestion and excessive street parking. The parking would be determined after the applicant submits an application, plans, and detail description of the proposed use.

Thank you for your interest and for contacting us. We will update you once we have more information.

**Sabina Roan**

Planning Assistant II  
Zoning Enforcement North  
Department of Regional Planning  
<http://planning.lacounty.gov>  
Tel. (213) 974-6483 | Fax. (213) 217-5108



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**From:** Steve Kuchenski [<mailto:skuchenski@onyxarchitects.com>]  
**Sent:** Thursday, March 24, 2016 5:27 PM  
**To:** Sabina Roan  
**Subject:** FW: Bridge to Nowhere status and parking requirements

Sabina, I am attaching the response letter I received from Richard Bruckner regarding the Bungee America (BN) "Bridge to Nowhere" (BTN) Clean Hands Waiver. In the letter, Richard suggested I contact you with further questions. My questions are as follows:

Regarding the Clean Hands Waiver:

1. What is the current status of the Clean Hands Waiver request, and when will a decision be made?

Regarding parking:

2. The letter says that BA must comply with National Forest requirements for parking and access. However, to my knowledge BA is not an approved vendor with the Forest Service (FS). Furthermore, the BTN is on land under jurisdiction of the County. My concern is that the county will look to the FS for compliance, and the FS will defer to the county's authority, and compliance might fall between the cracks.

Therefore, **I would like to know the county's own calculation / determination as to the number of required parking spaces required for the employees and customers of BA on the BTN land under county jurisdiction.** Has a parking study been prepared, or are you utilizing the area of the land or amusement structure (the area of the bridge)?

Regarding camping:

3. I realize that a camping use is allowed by-right in a C-R zone, but again the question arises as to the required parking for this by-right camping use. Has the county come up with a stall count for this?

Once we know the county's minimum parking requirements, this will enable the general public to provide reasonable input to the FS regarding any agreement for allocating limited FS parking spaces to a private entity under county jurisdiction.

Thanks,

Steve Kuchenski, Principal

**[ONYX ARCHITECTS](#)**

316 N. Sierra Madre Blvd.

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[skuchenski@onyxarchitects.com](mailto:skuchenski@onyxarchitects.com)

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**From:** Steve Kuchenski <kuchenski@gmail.com>  
**Sent:** Tuesday, October 30, 2018 8:26 AM  
**To:** Thuy Hua  
**Subject:** Re: CUP 2018-004676 and Parking Permit 2018-004677 for Bungee America

Thank you for your response. Yes, please include me in any courtesy notifications by emailing me at [kuchgeneral@gmail.com](mailto:kuchgeneral@gmail.com).

I hope to make an appointment to view the application documents sometime in the next few weeks. Meanwhile, may I also ask for pdfs of the following, if available to the public:

- A copy of the original letter from Cynthia Morgan, requesting the Clean Hands Waiver.
- A copy of the field inspection record and any related notes, per item 2, page 2 of the Clean Hands Waiver notification letter.

Thanks,

Steve

On Mon, Oct 29, 2018 at 9:13 AM Thuy Hua <[THua@planning.lacounty.gov](mailto:THua@planning.lacounty.gov)> wrote:

Steve,

Please see my responses to your questions below in blue.

**Thuy Hua, AICP**

Los Angeles County

Department of Regional Planning

320 W Temple St 13<sup>th</sup> Flr

Los Angeles, CA 90012

(P) 213-974-6443

<http://planning.lacounty.gov>

**From:** Steve Kuchenski <[kuchenski@gmail.com](mailto:kuchenski@gmail.com)>

**Sent:** Friday, October 26, 2018 8:34 AM

**To:** Thuy Hua <[THua@planning.lacounty.gov](mailto:THua@planning.lacounty.gov)>

**Subject:** CUP 2018-004676 and Parking Permit 2018-004677 for Bungee America

Thuy Hua: My name is Steve Kuchenski, and I am interested in the status of the applications CUP 2018004676 and Parking Permit 2018004677, as well as any CEQA studies, for the Bungee America operations in our local mountains. I am especially concerned by the impact of their operation on the parking capacity near the trailhead, and the resulting diminished access for other visitors to the East Fork. I am also concerned about the noise impact (helicopters, amplified music) on the adjacent wilderness experience. I am interested in any mitigation measures proposed for this. My specific questions are:

- Where can I view a copy of the applications and proposals? [Application materials for CUP 2018004676 and Variance \(for the parking\) 2018004861, collectively known as Project No. 2018-003069, are available at our Main Office in Downtown Los Angeles. The address is Hall of Records, 320 W Temple St 13<sup>th</sup> Floor, Los Angeles, 90012. You will need to make an appointment with me to view the materials.](#)
- Where can I see a copy of the CEQA initial checklist? [The Environmental Assessment Information Form is a part of the application and can be viewed concurrently with the rest of the application materials.](#)
- Who is conducting the CEQA? What studies are being proposed? [The review of the Environmental Assessment Information Form, information provided by the applicant to the County to determine what type of CEQA review is necessary, is conducted by the County. The application for the project is currently incomplete and therefore the full CEQA review has not yet been initiated.](#)
- Is there a process for providing input into the CEQA during the study period? [Should it be determined that an Environmental Impact Report be required for the project, there will be public notification periods as a part of that preparation and review process. All other environmental assessment documents do not have a public comment period during the preparation of the document. However, you are able to provide a public comment letter if there is information you want included as a part of the public record.](#)
- Given that the site is landlocked by the National Monument, is there any CEQA coordination with the ANM environmental studies and plans? If so, who is the Lead Agency? [We have been in contact with the U.S. Forest Service, most recently Adrienne Dunfee who is the Deputy Monument Manager. The project is requesting permits from the County and thus the Lead Agency on the CEQA analysis is the County.](#)
- Is there any community meeting or community outreach planned, prior to the formal public notice of the discretionary approval hearings? [At this time there are no community meetings scheduled, however you can be notified via the courtesy notification list if one is scheduled.](#)
- Is there a procedure for interested parties to be registered to be directly notified (e.g. an email distribution list) for activities related to these applications, rather than just hoping to spot a legal notice in a newspaper or seeing a sign posted in the forest? [Via email or letter correspondence to me, any interested parties can be requested to be included on this project's](#)

courtesy notification list. Please provide your preferred method of contact and corresponding contact information.

I look forward to your response.

Thanks,

Steve Kuchenski

San Gabriel, CA

**PAUL R. AYERS**  
ATTORNEY AT LAW  
1681 ALAMO DR.  
GLENDALE, CALIFORNIA 91207  
818-378-3217

*Reply to:*  
Paul R. Ayers, Esq.

Writer's Direct E-Mail:  
ayerspaul@sbcglobal.net

March 11, 2019

**BY E-TRANSMISSION ONLY**

Patrick Miles, Aviation Safety Officer, Area V  
Division of Aeronautics-MS40  
California Department of Transportation  
1120 N St., Rm. 3300  
Sacramento, CA, 95814-5606

RE: **Unlawful Operation of Heliport by Bungee America, Failure of Bungee America to apply for permit for Commercial use of Heliport**

Dear Mr. Miles:

I am writing on behalf of Save the East Fork, an unincorporated association. It has come to our attention that Ron Jones and Bungee America (collectively "BA") have violated the "personal use" limitation on its operation of a heliport at BA's "Bridge to Nowhere" site on the East Fork of the San Gabriel River. ("heliport" or "subject heliport".) Accordingly, I am urging the Division of Aeronautics, California Department of Transportation ("CDOT"); to reestablish its earlier cease and desist order prohibiting any use by BA of said heliport.

Additionally, this letter will confirm our conversation of March 8, 2019 wherein you informed me that BA had not applied for any permit with your office or otherwise taken any steps to reestablish commercial use of the subject heliport.

**VIOLATION OF TERMS OF CDOT NOVEMBER 29, 2016 LETTER BY BA**

On October 5, 2016 your office issued a "cease and desist" letter forbidding BA from any use of the subject heliport. In your letter of November 29, 2016 [attached hereto as Exhibit "A"] you rescinded the cease and desist order with the qualification that the heliport, "not be used in connection with transporting supplies, equipment, or revenue passengers, **or in any other capacity that supports commercial activities.**" [emphasis added.] Based on a Los Angeles County Department of Regional Planning ("DRP") inspection report dated August 31, 2018 it appears that BA has by its own admission violated that restriction by using the heliport to

March 11, 2019

Page 2

transport human waste generated by BA's employees and guests away from the site, an action which additionally appears to be in violation of Los Angeles County health regulations; a true and correct copy of the DRP inspection report is attached hereto as Exhibit "B". Given this latest unlawful action and BA's prior violations of CDOT standards it would be my expectation that the CDOT will again prohibit BA from using the subject heliport in any manner whatsoever.

**FAILURE OF BA TO APPLY FOR AVIATION PERMIT**

In our telephone conversation of March 8, 2019 you informed me that BA had made no application nor taken any other steps to reestablish commercial use of the subject heliport. I opined that given the terrain involved and other factors it seemed unlikely to me that the CDOT would ever allow future commercial use of the heliport.

As you may be aware BA is being allowed to continue its bungee-jumping operation at its Bridge to Nowhere site pursuant to a DPR "clean hands waiver" which expires on March 31, 2019. If CDOT shares my opinion on the improbability of BA ever being allowed to resume commercial operation at the subject heliport, I would urge you to share this belief with the DPR as I believe it is position of all parties to this matter that without the ability to use the heliport in support of BA's commercial enterprise, said enterprise is not viable.

I look forward to learning what actions the CDOT will take as to BA's continued operation of the subject heliport based on the issues raised in this letter.

Thank you for your courtesy and consideration in this matter.

Very truly yours,

**-S-**

PAUL R. AYERS, ESQ.

PRA:mef

cc:

Raiyn Bain, Esq., Legal Division [by e-transmission only]

Division of Aeronautics-MS40

California Department of Transportation

1120 N St., Rm. 3300

Sacramento, CA, 95814-5606

Matthew Bokach, Monument Manager [by e-transmission only]

Adrienne E. Dunfee, Deputy Monument Manager

USDA-FS, San Gabriel Mountains National Monument

110 N. Wabash Ave.

Glendora, CA 91741

March 11, 2019

Page 3

Supervisor Kathryn Barger  
Los Angeles County Board of Supervisors  
Downtown Office  
500 West Temple Street, Room 869  
Los Angeles, CA 90012

Oscar Gomez, Supervising Regional Planner [by e-transmission only]  
Los Angeles County Department of Regional Planning  
320 West Temple Street, 13th Floor  
Los Angeles, California 90012

Louis Sahagun, Staff Writer [by e-transmission only]  
Los Angeles Times  
Times Mirror Square  
Los Angeles, CA 90053

Edel Vizcarra [by e-transmission only]  
Planning and Public Works Deputy  
Supervisor Kathryn Barger

Sussy Nemer [by e-transmission only]  
Field Deputy, Pasadena Office  
Supervisor Kathryn Barger

Isabella C. Kwok, MPA, REHS [by e-transmission only]  
Chief Environmental Health Specialist  
Los Angeles County Department of Public Health

Thomas Dearborn [by e-transmission only]  
Regional Planner  
Los Angeles County Department of Regional Planning

Jose De La Rosa [by e-transmission only]  
Regional Planner  
Los Angeles County Department of Regional Planning

Samuel Dia [by e-transmission only]  
Regional Planner  
Los Angeles County Department of Regional Planning

**DEPARTMENT OF TRANSPORTATION**

DIVISION OF AERONAUTICS – M.S. #40  
1120 N STREET  
P. O. BOX 942874  
SACRAMENTO, CA 94274-0001  
PHONE (916) 654-4959  
FAX (916) 653-9531  
TTY 711  
www.dot.ca.gov

General Correspondence  
Los Angeles County



*Serious drought!  
Help Save Water!*

November 29, 2016

Dr. Ron Jones  
Bungee America  
16654 Soledad Canyon Road, Suite 464  
Canyon Country, CA 91387-3217

Dear Dr. Jones:

The California Department of Transportation, Division of Aeronautics has reviewed your request to operate a heliport on your personal property located approximately 20 miles northeast of Azusa, California in accordance with the California Code of Regulations (CCR), section 3533, paragraph (b)(3), which exempts personal-use heliports located in unincorporated areas.

Your heliport is exempt from State heliport permit requirements if its use is limited to non-commercial activities and it meets the layout criteria described in Article 5 of the CCR. Please see enclosure. This exemption will be immediately nullified if your heliport is not operated in accordance with the following restrictions: It may not be used in connection with transporting supplies, equipment, or revenue passengers, or in any other capacity that supports commercial activities as defined as follows in CCR, section 3527(d):

Those activities which may offer a facility, service or commodity for sale, hire, profit, or any other business purpose. Examples of commodities for sale are: food, lodging, entertainment, real estate, petroleum products, parts and equipment. Examples of services are: flight training, charter flights, maintenance, aircraft storage and tie-down. Examples of a facility used for a business purpose are: facility used for the transport of persons for a corporate business purpose and a facility used to transport persons for compensation or hire.

Our cease and desist letter to you dated October 5, 2016, is hereby rescinded, as long as your personal-use facility is operated in accordance with the restrictions listed above.

If you have questions or require additional assistance, please contact me at (916) 654-5376, or via e-mail at: [patrick.miles@dot.ca.gov](mailto:patrick.miles@dot.ca.gov).

Sincerely,  
*Original signed by*

PATRICK J. MILES  
Aviation Safety Officer

Enclosure

- c: Zoning Enforcement Office, Department of Regional Planning, 320 West Temple Street, Los Angeles, California 90012-3208
- bc: Gary Slater, District Deputy Director Planning, District 7  
Raiyn Bain, Attorney, Legal Division

Patrick Miles:do

s:\z\pm-Bungee America, HP

*"Provide a safe, sustainable, integrated, and efficient transportation system  
to enhance California's economy and livability."*

**EXHIBIT "A"**

**CODE DETAILED REPORT (14-0002827)**

11. INSPECTION 08/31/2018:

Thomas Dearborn

9/12/2018 12:34 pm

Investigating Planner - Thomas Dearborn  
 Contact – Ron Jones, Property owner - Gretchen Jones  
 Inspection conducted by Thomas Dearborn and Oscar Gomez.  
 Mr. Dearborn and Mr. Gomez met Mrs. Jones at the trailhead for guided hike to Bridge to Nowhere site. The hike took approximately 2 hours to get to the site. They met Mr. Jones who was already at the property. The planners sat down and discussed the operations conducted at Bungee America which consist of bungee jumping and a zip line course. Mr. Jones stated that patrons park at the trail head and hike the approximate 5 miles to the site. They typically have an employee meet and guide the patrons. People are able to register in advanced or do on-site registration if they hike to the site without a guide. Hours of operation are approximately 7:00AM to 4:00PM including hike time to and from site. They provide the option to hike back with staff but Mr. Jones stated that most people choose to hike back alone. They require a signed safety waiver regulated by DOSH. The state inspects the bridge every year and provides owners with a certificate after the inspection. Along with the bungee and zip line activities they conduct overnight camping experiences in which people camp in tents and partake in nigh time recreational activities (bungee and zipline). Mr. Jones stated there is a caretakers unit in one of the cargo containers in which employees stay in a retractable bed overnight when necessary, particularly when guests are camping or they are setup for bungee jumping during the weekends. There is a cargo container behind the caretaker unit used for storage. Approximately a caretaker onsite 52 days a year. There are signs that identify the property line along the trail. There were also brass caps installed by the US Forest service identifying corners of the property. Only one of these caps was visible during the inspection. There are four cargo containers located at base camp and one where the helicopter is stored. A concrete building holds a self contained restroom in which Mr. Jones demonstrated the bucket system he utilizes to contain and remove waste from the site. He transports out the waste via helicopter and takes it to an LA County certified septic facility. The bridge is where the bungee jumping occurs. Bungee equipment is setup and taken down each day that the business is operating. Jumpers and spectators are provided wristbands to identify patrons that are part of the operation and are allowed to use restroom facilities.  
 Mr. Jones suggested that he would like to make the facade of the cargo containers more similar to the surrounding environment down the road. Mr. Dearborn and Mr. Gomez instructed him to draft a proposal and to submit it with the CUP application but to not make changes on site at this point in time. There is an old portable toilet on its side located in a valley on the way to the helicopter storage area. There is a helicopter landing site on the western portion of the property.

**EXHIBIT “B”**

**VIA U.S. MAIL & E-MAIL**

02/15/2022

County of Los Angeles Department of Regional Planning  
320 W Temple St  
Los Angeles CA 90012  
Em: [info@planning.lacounty.gov](mailto:info@planning.lacounty.gov)

Supervisor Kathyn Barger  
C/O Sandra Croxton, Field Deputy, East San Gabriel Valley  
500 West Temple Street, Room 869  
Los Angeles, CA 90012  
Em: [Kathryn@bos.lacounty.gov](mailto:Kathryn@bos.lacounty.gov)

RE: Comments on Illegal Bungee America Operation

To Whom It May Concern:

As a resident of Altadena, in Los Angeles County. I am writing to express my opposition to the illegal bungee jumping operations of Bungee America at the Bridge to Nowhere.

The property where Bungie America is located is not designed for commercial use. The former site was a vacant land not used for any commercial purposes. Introduction of bungee jumping, zip line ridges or using helicopters is a significant change to the purpose of the land. It is a wilderness area and its use should remain consistent with low-impact and non-ecologically damaging activities.

The owner of Bungie America has not obtained a federally required Outfitter and Guide Permit that is required for commercial travel through the Federal Wilderness Areas. Bungee jumpers walk about 3 miles through Sheep Mountain Wilderness, a federal wilderness area to reach the Bungee Property. Any individual entering Sheep Mountain Wilderness must have a Wilderness permit. However, to date, Bungee America still has not and continues to flout federal regulations in doing so.

The East Fork region of the San Gabriel River was designated as Wild and Heritage Trout Waters by the California Fish and Game Commission. The designation guarantees public access rights to the rivers and canyons above and below the bridge. Despite that, Bungee America has placed trespass warning signs intended to keep the public out. In doing so Bungee America has also defied the California Fish and Game Commission in addition to Federal regulations.

Bungee America creates crowds of traffic, taking over the publicly owned parking lot at the end of East Fork road. Bungee jumpers detract and disrupt the outdoor experience and wilderness experience.

As a resident of LA county, a US Public Landowner, and as a person concerned with conservation, I strongly urge the Department to step in and stop the illegal operations of Bungee America.

Sincerely,

Ross Thomas  
1917 Sinaloa Ave  
Altadena CA 91001  
Cc: Ben White, TrailAngeles.org



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**From:** ben white <[bwootenwhite@hotmail.com](mailto:bwootenwhite@hotmail.com)>  
**Sent:** Wednesday, June 3, 2020 6:57 AM  
**To:** Ramon Cordova <[rcordova@planning.lacounty.gov](mailto:rcordova@planning.lacounty.gov)>  
**Subject:** Fw: Bridge to Nowhere,Bungee America

**CAUTION:** External Email. Proceed Responsibly.

Dear Mr. Cordova,

Please add the following correspondence to Mr. Jones'/Bungee America file. This is my second letter to Supervisor Barger about Bungee America not adhering to the restrictions imposed by the state and county regarding doing business or not during the virus crisis. Thank you very much,best regards,Ben White, Save the East Fork

---

**From:** ben white  
**Sent:** Tuesday, June 2, 2020 5:39 PM  
**To:** [Kathryn@bos.lacounty.gov](mailto:Kathryn@bos.lacounty.gov) <[Kathryn@bos.lacounty.gov](mailto:Kathryn@bos.lacounty.gov)>  
**Subject:** Bridge to Nowhere,Bungee America

To. Ms. Kathryn Barger  
Los Angeles County Supervisor

Dear Ms. Barger,

I want to bring to your attention that Bungee America is still doing business in the Sheep Mountain Wilderness. I presume that he would need permission to restart or do business during this time. Recently there was an incident where the owner of the bungee jumping business,Ron Jones,put his hands on a hiker using the bridge,and told this hiker and others in the party that they couldn't use the bridge. The bridge has been used for hiking for over 50 years. In the photos that the hiker who reported the incident there were crowds of people at the bridge, there was no one wearing a mask, and no attempt at social distancing.

Mr. Jones has a helicopter that he uses to ferry goods to the bridge. Jones doesn't have a permit to run a heliport at this location, and is in violation of the FAA guidelines regarding flying in and over Wilderness Areas.

Jones does not have a permit to have a restroom at the bridge, and has no permit to transport human wastes from this location.

This situation has been going on for years, yet he is still able to do business.

I trust something can be done about this blatant disregard for public health and hiking right of way.

Thank you,

Best regards, Ben White, Chairperson, Save the East Fork



**VIA U.S. MAIL & E-MAIL**

February 16, 2022

County of Los Angeles Department of Regional Planning  
320 W Temple St  
Los Angeles CA 90012  
Em: [info@planning.lacounty.gov](mailto:info@planning.lacounty.gov)

Supervisor Kathyn Barger  
C/O Sandra Croxton, Field Deputy, East San Gabriel Valley  
500 West Temple Street, Room 869  
Los Angeles, CA 90012  
Em: [Kathryn@bos.lacounty.gov](mailto:Kathryn@bos.lacounty.gov)

RE: Comments on Illegal Bungee America Operation

To Whom It May Concern:

As a resident of Glendora, I am expressing concern about the illegal bungee jumping operations of Bungee America at the Bridge to Nowhere.

1. The property where Bungee America is located is not designed for commercial use. The former site was vacant land not used for any commercial purposes. Introduction of bungee jumping, zip line ridges or using helicopters is a significant change to the purpose of the land.
2. The owner of Bungee America has not obtained a federally required Outfitter and Guide Permit that is required for commercial travel through the Federal Wilderness Areas. Bungee jumpers walk about 3 miles through Sheep Mountain Wilderness, a federal wilderness area to reach the Bungee Property. Any individual entering Sheep Mountain Wilderness must have a Wilderness permit. However, to date, Bungee America still has not and continues to flout federal regulations in doing so.
3. The East Fork region of the San Gabriel River was designated as Wild and Heritage Trout Waters by the California Fish and Game Commission. The designation guarantees public access rights to the rivers and canyons above and below the bridge. Despite that, Bungee America has placed trespass warning signs intended to keep the public out. In doing so

Bungee America has also defied the California Fish and Game Commission in addition to Federal regulations.

4. Bungee America creates crowds of traffic, taking over the publicly owned parking lot at the end of East Fork road. Bungee jumpers detract and disrupt the outdoor experience and wilderness experience.

As a resident, I strongly urge the Department to step in and stop the illegal operations of Bungee America.

Sincerely,

Geric Johnson  
President, Angeles Volunteer Association  
926 E Mountain View Ave.  
Glendora, CA 91741

cc: Ben White, Save the East Fork, and San Gabriel Mountains Trailbuilders.

**From:** [Richard Claghorn](#)  
**To:** [Edward Rojas](#)  
**Subject:** Re: Bungee America - Opposition Letter  
**Date:** Wednesday, February 16, 2022 9:12:24 AM

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Hi Ed,

Yes, it is. Thanks.

Richard Claghorn  
Principal Regional Planner  
North County Development Services Section  
Department of Regional Planning

***We Appreciate Your Feedback!***

*Please take a moment and fill out our EPIC-LA customer experience survey by clicking on the link below:*

<https://bit.ly/LACoCSSSurvey>

*In response to increased case rates of COVID-19 in Los Angeles County and to protect the health and safety of employees and the public, Regional Planning will be providing all public services virtually. For the most current information about available services, public meeting schedules, and planning projects, please visit [planning.lacounty.gov](http://planning.lacounty.gov).*

---

**From:** Edward Rojas <erojas@planning.lacounty.gov>  
**Sent:** Wednesday, February 16, 2022 8:47 AM  
**To:** Richard Claghorn <rclaghorn@planning.lacounty.gov>  
**Subject:** FW: Bungee America - Opposition Letter

Hi Richard,

Is this for your case?

**Edward Rojas, AICP** | Supervising Regional Planner  
Operations and Major Projects

---

**From:** DRP Info <info@planning.lacounty.gov>  
**Sent:** Wednesday, February 16, 2022 8:43 AM  
**To:** Edward Rojas <erojas@planning.lacounty.gov>  
**Subject:** FW: Bungee America - Opposition Letter

---

**From:** Ross Thomas <[rmthomas2@gmail.com](mailto:rmthomas2@gmail.com)>  
**Sent:** Tuesday, February 15, 2022 12:28 PM  
**To:** DRP Info <[info@planning.lacounty.gov](mailto:info@planning.lacounty.gov)>; Barger, Kathryn <[Kathryn@bos.lacounty.gov](mailto:Kathryn@bos.lacounty.gov)>  
**Cc:** [bwootenwhite@hotmail.com](mailto:bwootenwhite@hotmail.com)  
**Subject:** Bungee America - Opposition Letter

**CAUTION: External Email. Proceed Responsibly.**

Good afternoon -

Attached you will find my letter stating my opposition to the illegal and ecologically damaging activities of Bungee America. I have also shared this matter with my fellow members of the Pasadena Casting Club, who share my concern for the treatment of our public lands and the negative effects these activities have on our wildlife, game species, and other land users.

Respectfully,

Ross Thomas

**From:** [Edward Rojas](#)  
**To:** [Richard Claghorn](#)  
**Subject:** FW: Comments on Illegal Bungee America Operation  
**Date:** Wednesday, February 16, 2022 1:50:22 PM

---

Another comment for your project

**Edward Rojas, AICP** | Supervising Regional Planner  
Operations and Major Projects

---

**From:** DRP Info <[info@planning.lacounty.gov](mailto:info@planning.lacounty.gov)>  
**Sent:** Wednesday, February 16, 2022 1:49 PM  
**To:** Edward Rojas <[erojas@planning.lacounty.gov](mailto:erojas@planning.lacounty.gov)>  
**Subject:** FW: Comments on Illegal Bungee America Operation

---

**From:** Barry Sohl <[barrysohl@gmail.com](mailto:barrysohl@gmail.com)>  
**Sent:** Tuesday, February 15, 2022 10:16 PM  
**To:** DRP Info <[info@planning.lacounty.gov](mailto:info@planning.lacounty.gov)>  
**Cc:** [bwootenwhite@hotmail.com](mailto:bwootenwhite@hotmail.com)  
**Subject:** Comments on Illegal Bungee America Operation

**CAUTION: External Email. Proceed Responsibly.**

County of Los Angeles Department of Regional Planning  
320 W Temple St  
Los Angeles CA 90012  
Em: [info@planning.lacounty.gov](mailto:info@planning.lacounty.gov)

To Whom It May Concern:

As a resident of Orange County, I am expressing by ongoing concern about the illegal bungee jumping operations of Bungee America at the Bridge to Nowhere.

1. Bungee America customers fill the entire public parking lot intended for hiker use at the Bridge to Nowhere trailhead. Hikers are often forced to park far away from the parking lot, sometimes in illegal or dangerous locations along the road.
2. Bungee America customers have a detrimental impact on the wilderness area and outdoor experience. I have personally been stuck behind the Bungee group while hiking, unable to pass them. I watched as members of the large group carelessly tossed water bottles and other trash on the ground while continuously walking off-trail mangling the surrounding vegetation.
3. Hikers are required to have a wilderness permit to enter the Sheep Mountain Wilderness, yet Bungee America customers walk approximately 3 miles through the wilderness area without a permit. And it is my understanding that the owner of Bungee America has not obtained the necessary Guide permit required for commercial travel through the wilderness.

As a resident, I strongly urge the Department to step in and stop the illegal operations of Bungee America. This illegal use has been going on for years without action. I had hoped that the formation of the National Monument would finally put an end to the illegal practices, but it has not. It is time to finally take action and return the wilderness area to its intended use.

Sincerely,  
Barry Sohl

203 Frankfort Avenue  
Huntington Beach, CA 92648  
(714)742-7645

**From:** [DRP Info](#)  
**To:** [Richard Claghorn](#)  
**Cc:** [DRP CP North County](#)  
**Subject:** FW: Comments on Illegal Bungee America Operation  
**Date:** Thursday, February 17, 2022 5:25:03 PM

---

Hi Richard,

I think this is your case.

Jolee

---

**From:** Amelia V. Borja <milliehv@gmail.com>  
**Sent:** Thursday, February 17, 2022 10:49 AM  
**To:** [DRP Info <info@planning.lacounty.gov>](#); [Barger, Kathryn <Kathryn@bos.lacounty.gov>](#)  
**Cc:** [bwootenwhite@hotmail.com](#)  
**Subject:** Comments on Illegal Bungee America Operation

**CAUTION: External Email. Proceed Responsibly.**

2/17/2022

To Whom It May Concern:

As a resident of Azusa, California I am expressing my opposition to the illegal bungee jumping operations of Bungee America at the Bridge to Nowhere.

The East Fork region of the San Gabriel River was designated as Wild and Heritage Trout Waters by the California Fish and Game Commission. The designation guarantees public access rights to the rivers and canyons above and below the bridge. Despite that, Bungee America has placed trespass warning signs intended to keep the public out. In doing so Bungee America has also defied the California Fish and Game Commission in addition to Federal regulations. In addition to denying public access to this outdoor space, Bungee America creates crowds of traffic, taking over the publicly owned parking lot at the end of East Fork road and making it impossible for members of the public to use the area for its intended purpose. Bungee jumpers detract and disrupt the outdoor experience and wilderness experience.

As a resident, volunteer and member of the outdoor community I strongly urge the Department to step in and stop the illegal operations of Bungee America.

Sincerely,

Amelia Borja  
121 West 9<sup>th</sup> street, Azusa CA  
91702

## Richard Claghorn

---

**From:** Steve Anderson <sandersonimagery@outlook.com>  
**Sent:** Monday, August 19, 2024 3:00 PM  
**To:** Richard Claghorn  
**Subject:** Project 2018-003069

**CAUTION:** External Email. Proceed Responsibly.

Dear Mr. Claghorn,

I'm writing you to express my concerns about the Conditional Use Permit sought by Bungee America (BA).

I don't think this kind of business (i.e. amusement park) should even be allowed in the Sheep Mountain Wilderness. Although it is currently on a parcel of private land, I still do not think it is compatible with the qualities of what defines a Wilderness.

For several decades I hiked in the East Fork river canyon, enjoying the quiet and solitude of our beautiful San Gabriel mountains. When BA moved in with their business much change occurred to the detriment of the canyon and the experience. There was a noticeable increase in the amount of trash, human waste, trail wear, decreased water quality, and especially traffic on the road to the trailhead (there is also a serious lack of parking). Although this area has in general experienced an increase in the above, without the attraction of jumping off the "The Bridge to Nowhere", it would not be as severe as it is now.

In conclusion I just want to say that regardless of the fact that BA is on a chunk of private land, I strongly oppose the issuance of a special permit for them to operate in the middle of what has been deemed worthy of Wilderness status.

Thanks for your time.  
Steve Anderson  
Fountain Valley, CA



AMY J. BODEK, AICP  
Director,  
Regional Planning

DENNIS SLAVIN  
Chief Deputy Director,  
Regional Planning

February 7, 2024

VIA ELECTRONIC MAIL

Ron Jones  
Bungee America, LLC  
16654 Soledad Canyon Road, Ste 464  
Canyon Country, CA 91387

Dear Mr. Jones:

**BUNGEE AMERICA CLEAN HANDS WAIVER EXTENSION  
RFS NO: 14-0002827**

I am in receipt of your request received on January 24, 2024, to extend the term of the Clean Hands Waiver (Waiver) for an additional period of one year to allow for the continued processing of Conditional Use Permit (CUP) No. RPPL2018004676. I previously granted a Waiver of County Code Section 22.02.070 (previously County Code Section 22.04.110) to operate a bungee jumping facility (Bungee America) with associated camping, heliport, and use of five storage containers, while a CUP, Parking Variance, Aviation Permit, or any other required land use permit (collectively known as Application) is filed and processed.

**Background**

The initial Waiver was set to expire on March 31, 2019, and on April 8, 2019, the Department of Regional Planning (DRP) granted a six-month extension of the expiration date to October 8, 2019, provided you met three requirements, which you met. On November 13, 2019, DRP granted an additional six-month extension of the expiration date to April 9, 2020, provided you met two requirements, which you subsequently met. On June 9, 2020, DRP granted an additional six-month extension of the expiration date to November 11, 2020, provided you met three requirements, which you met. On February 3, 2021, DRP granted a one-year extension to expire on February 4, 2022. On February 3, 2022, DRP granted a one-year extension with an expiration date of February 3, 2023, provided you met two requirements, which you met. On February 2, 2023, DRP granted a one-year extension with an expiration date of February 1, 2024, provided you met one requirement, which you met.

You indicate that you have been in communication with the Fire Department and the Departments of Public Health (DPH) and Public Works (DPW), and that you have submitted all information requested by staff but are still waiting for clearance letters from DPH and DPW. Furthermore, you indicate that there have been no changes or expansions to the facilities operating on the subject property.

**Department Determination**

Given the circumstances that are beyond your control and your continued communication with DPH and DPW to address their requests, I will extend the term of the Waiver to allow the continued operation of Bungee America with associated camping, heliport, and use of five storage containers, while the application is processed.

The expiration date of the initial Waiver granted on July 3, 2018, is hereby modified, and now expires on **February 1, 2025**. All terms of the original Waiver, including amendments, remain in full force and effect. Copies of previous Waivers are attached for your reference. While the extension is in effect, your client or any person is prohibited from expanding, enlarging, or adding additional uses, activities, or structures.

Failure to comply with the terms of the Waiver shall be grounds for revocation of the Waiver. Revocation is at the sole discretion of the Director of LA County Planning, and it is not subject to appeal.

If you have any questions regarding the Application, please contact Mr. Samuel Dea at (213) 974-6443 or via email at [sdea@planning.lacounty.gov](mailto:sdea@planning.lacounty.gov). If you have questions regarding the Waiver, please contact Mr. Oscar A. Gomez at (213) 974-6483 or via email at [ogomez@planning.lacounty.gov](mailto:ogomez@planning.lacounty.gov).

Sincerely,



AMY J. BODEK, AICP  
Director of Regional Planning

AJB:DS:AG:OAG:rm

Attachment

c: Supervisor Kathryn Barger (A. Saraiya)  
Regional Planning (M. Glaser, S. Dea, R. Claghorn, O. Gomez, R. Meza)  
Cynthia Morgan Reed

S\_02\_07\_2024\_LUR\_L\_ROM\_JONES



## Federal Aviation Administration

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### Memorandum

Date: April 15, 2020

To: Mark Steinbicker, Manager, Flight Technologies and Procedures Division  
ATTN: Richard Armstrong

**KEITH A  
FRABLE** Digitally signed by KEITH A  
FRABLE  
Date: 2020.04.16 12:59:42  
-07'00'

From: Keith A. Frable, Manager, Riverside Flight Standards District Office

Prepared by: Roy R. Peters, Principal Operations Inspector, (951) 276-6701x329

Subject: Heliport Evaluation Request, Azusa, CA (AWP-2020-1191-NRA)

---

The attached proposal for the Bridge To Nowhere (BTNW) PPR Heliport, Azusa, CA was reviewed by Inspector Peters and is returned as requested. This office has no objection with one provision.

This is a proposed private day use heliport. This office recommends the following condition should be met prior to approval: Ensure unauthorized persons are restrained from access to the takeoff/landing area during helicopter flight operations by use of a non-obstructing safety barrier.

An evaluation of the proposed heliport located near the BTNW, Azusa, California, Case Number AWP-2020-1191-NRA, was conducted in accordance with FAA Order 8900.1, Volume 8, Chapter 3, Section 3. The completed Heliport Evaluations Checklist is attached along with the original case data sent to this office.

2 Attachments

### On-Site Heliport Evaluations Checklist Job Aid – AWP220

*NOTE:* Use this checklist to complete and confirm correct data on the FAA Form 7480-1.

Name of Proponent:	Ron Jones	Site ID (if known):	BTNW PPR Heliport (80756)
NRA Tracking #:	AWP-2020-1191-NRA	Date of Inspection:	04/13/2020

<b>1. Heliport Design</b>	
A. Duration of Use: <input checked="" type="checkbox"/> Permanent <input type="checkbox"/> Temporary	
B. <input checked="" type="checkbox"/> Ground Level Heliport <input type="checkbox"/> Water Heliport <input type="checkbox"/> Ship/Barge Heliport <input type="checkbox"/> Elevated Heliport	
C. Design helicopter to use the heliport:	Robinson R-44

<b>2. Proponent Contact Information</b>			
A. Name:	Ron Jones		
B. Address:	16654 Soledad Canyon Road #464, Canyon Country, CA 91387		
C. Telephone #:	(310) 923-6306	Fax #:	(310) 322-8892
D. Email Address:	gjones827@gmail.com		

<b>3. Location of Heliport – Use GPS to confirm the lat/long/elevation during on-site inspection.</b>			
A. Street Address	Bridge to Nowhere, San Gabriel Mountains		
B. City	Azusa	State	CA
C. Latitude:	34 ° 16 ' 55.00 " N	Longitude:	117 ° 44 ' 59.00 " W
D. Elevation:	2810 ft		

<b>4. Type of Use:</b>	
A. <input type="checkbox"/> Public Use <input checked="" type="checkbox"/> Private (PPR) <input type="checkbox"/> Private Use of Public Land/Waters	
B. <input checked="" type="checkbox"/> General Aviation Heliport <input type="checkbox"/> Transport Heliport <input type="checkbox"/> Hospital Heliport	
C. <input checked="" type="checkbox"/> VFR Use <input type="checkbox"/> IFR Use (Identify Approach) :	
D. <input checked="" type="checkbox"/> Day <input checked="" type="checkbox"/> Night	

<b>5. Dimensions of Surfaces – Confirm during on-site inspection – All measurements in feet</b>			
A. Touchdown and Liftoff Area	Length:	46 ft	Width: 46 ft
B. Final Approach & T.O. Area	Length:	85 ft	Width: 85 ft

C. Safety Area	Length:	15.5 ft	Width:	15.5 ft
D. Notes: Heliport is a circular design.				

6. Suitability of Approach/Takeoff Paths	
Note: Confirm that the 8:1 slope (7.125°) is satisfactory from the forward edge of the FATO to 4000 feet. All headings should be magnetic headings from the landing area using the center of the TLOF as the reference point.	
A. Prevailing winds?	Southwest
B. Satisfactory Ingress/Egress may be accomplished from all directions:	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
C. Satisfactory only in the following area:	SEE° to NOTES°
D. Additional satisfactory area or route:	N/A° to N/A°
E. No suitable ingress/egress routes exist under the present conditions	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
F. No other ingress/egress routes should be used	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Notes/Comments: Surveyed proponent's proposed ingress/egress routes (035/215 degrees MAG and 090/270 degrees MAG). Proposed routes SATISFACTORY.	

7. Landing Area Data – Note during on-site inspection	
A. Type of surface:	<input checked="" type="checkbox"/> Concrete <input type="checkbox"/> Asphalt <input type="checkbox"/> Metal <input type="checkbox"/> Water <input type="checkbox"/> Wood <input type="checkbox"/> Other
B. Weight Limit:	12000 lbs.
C. Approved Heliport Markings:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
D. Approved Heliport Lighting:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
E. Night Vision Goggle Ops Planned?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unknown
Notes/Comments: None.	

<b>8. Other Heliport Data – Note during on-site inspection</b>	
A. Heliport Beacon:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required
B. Communication Plan:	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
C. Does the Heliport have fire protection?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required
D. Describe the kind of fire protection (note if NFPA 418 approved): Portable fire extinguisher (Rating 20-A: 120-BC per combined NFPA 418 and California Fire Code Standards).	
E. Does the heliport have a wind direction indicator?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
F. Description (lit, location, visible from TLOF and 500 ft distance on final approach, etc.)  One 12 ft tall windcone. Windcone externally lit with red obstruction light and 4 floodlights (FEC Helioprts Model HP 0907-LED). Measured from TLOF, windcone is at 330 degrees (MAG) approximately 146 ft.	

<b>9. Heliport Vicinity Data</b>	
A. List any other landing areas within 5 nm of the site (Name, location ID, type (airport, heliport, seaplane), direction, and distance from the site: Brackett Field (KPOC) 4.75 NM 151 degrees (MAG).	
B. List any obstructions in the vicinity of the approach/departure protection area. Include recommended mitigation for obstructions that penetrate the 8:1, such as limited ingress/egress routes to avoid, removal, lowering, lighting, or marking the obstacle, etc. Two power poles penetrate Outbound Course 1 (departure heading 035 degrees MAG) transition area. Pole 1 is 033 degrees MAG, 734 ft from FATO. Power pole 2 is 011 degrees MAG, 841 ft from FATO. Both power poles penetrate the same side of the transition area. According to builder's plans, transitional surface penetrations to be marked with red obstruction lights. During the site survey, Los County Department of Public Works Dam Supervisor Stan Brown stated that all power poles in the vicinity of the heliport are to be removed and wires buried.	
List possible noise sensitive areas in the vicinity and direction/distance from site, such as schools, public areas, wildlife, etc. Residential neighborhood 222 degrees (MAG) 1.53 nm.	

10. State and Local Requirements	
A. Proponent informed to verify building permit and zoning rules met:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
B. Proponent informed to contact state aviation authorities:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
C. Proponent notified to address any environmental requirements?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

11. Does the heliport meet AC 150/5390-2B design criteria for:		
A. TLOF	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Reason:
B. FATO	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Reason:
C. Safety Area	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Reason:
D. VFR App/Dep Paths	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Reason:
E. MRI	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	Reason:
F. Wind Direction	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Reason:
G. Taxiways	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	Reason:
H. Helicopter Parking	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	Reason:
I. Markings	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Reason:
J. Lighting	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Reason:
K. Obstructions	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Reason:
L. Safety Enhancements	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	Reason:
M. Zoning/Land Use	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	Reason:

12. Conclusion	
A. In your opinion, can helicopter operations be conducted safely at the proposed site?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> Provisionally <input type="checkbox"/> No
B. List provisions for safe helicopter operations: None.	

C. List recommendations for safe helicopter operations: (1) Remove power poles in the immediate vicinity of the heliport and place the power lines underground; (2) A representative of Flight Standards Service (AFS) evaluates the heliport for compliance prior to operational use; (3) Ensure unauthorized persons are restrained from access to the takeoff/landing area during helicopter flight operations by use of a non-obstructing safety barrier. The proposed heliport sits next to a road.

Roy R. Peters



~~11/22/2017~~ *GR*

4/16/2020

Inspector Name

Signature

Date

State of California  
 Department of Industrial Relations - Division of Occupational Safety and Health  
 Amusement Ride and Tramway Unit  
 Permanent Amusement Ride Program



Northern District Office

Southern District Office

Certificate of Inspection

Date 11/26/2023

Division QSI Inspection: Certificate Fee Included

**Bungee America**

**(310)322-8892**

Owner's Name	Owner's Phone		
16654 Soledad Canyon Rd, Ste 464	Canyon Country CA	91387	

Owner's Address	City	State	Zip
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**Bridge to Nowhere**

Operator's Name if different from above	Operator's Phone		
Camp Bonita and East Fork Road	San Gabriel Canyon CA	91702	

Operator's Address	City	State	Zip
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**Camp Bonita and East Fork Road, San Gabriel Canyon, CA, 91702**

Location of Ride (Address)

Location (Cont.)	City	State	Zip
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*Ron Jones*  
 Signature (Owner, Operator or Responsible Party)

**Ron Jones**  
 Printed Name

*Dec 10, 2023*  
 Date

The Division's Qualified Safety Inspector listed below has completed a comprehensive QSI inspection of the safety-related systems and structural attributes of the ride(s) listed on the reverse of this form. No deficiencies were noted and the listed ride(s) were found to be in conformance with the requirements of Sub-chapter 6.2 of Chapter 4, Division 1, (starting at section 3195.1) of Title 8. The following individuals with QSI certification numbers listed (if applicable), assisted with the completion of the ride inspection.

**Kelley Roberts**

Digitally signed by Kelley Roberts  
 Date: 2023.12.07 14:51:38 -08'00'

**R5476**

10/07/2025

Division QSI Inspector Signature

QSI Number

Expiration Date



**SUPPLEMENTAL REPORT TO THE REGIONAL PLANNING COMMISSION**

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DATE ISSUED: September 5, 2024  
HEARING DATE: September 11, 2024      AGENDA ITEM: 9  
PROJECT NUMBER: 2018-003069-(5)  
PERMIT NUMBER(S): Conditional Use Permit RPPL2018004676  
Variance RPPL2018004861  
  
SUPERVISORIAL DISTRICT: 5  
PROJECT LOCATION: Assessor’s Parcel Numbers 8678-002-015 and  
8678-002-016  
OWNER: Saunders Mine LLC  
APPLICANT: Bungee America, Inc.

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The above-identified item is a request for:

- A Conditional Use Permit to authorize an amusement ride (bungee jumping), a private heliport, and overnight camping with appurtenant facilities (a container used as a hangar to store a helicopter, two storage containers, a storage building, an office, a security booth, a restroom building with composting toilets, a removable shade canopy, a directional/informational sign, and fencing) (“Project”) in the C-R (Commercial Recreation) Zone pursuant to County Code Section 22.20.030 (Land Use Regulations for Commercial Zones).
- A Variance to waive the parking requirements for the Project pursuant to County Code Section 22.194.020 (Variances – Applicability).

The applicant has submitted additional correspondence in the time since the Report to the Regional Planning Commission dated August 29, 2024 was provided to you. This correspondence is attached.

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Report  
Reviewed By:   
Samuel Dea, Supervising Regional Planner

Report  
Approved By:   
Mitch Glaser, Assistant Deputy Director

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Attachment: Correspondence



**Bungee Experts Since 1989**

Via E-mail c/o: Richard Claghorn: rclaghorn@planning.lacounty.gov

September 5, 2024

LA County Regional Planning Commission  
320 West Temple Street  
LA County Hall of Records, Room 150  
Los Angeles, CA 90012

**RE: Project No. 2018-003069-(5), Bungee America, Inc. (RPC public hearing date, September 11, 2024)**

Hon. Chair Pam O'Connor and Commissioners:

I am the proud owner of Bungee America, an internationally pioneering and renowned bungee jumping business I have operated at the "Bridge to Nowhere" for 35 years, through good times and bad. As expertly outlined in the staff report provided to your Commission, my 50-acre property containing the bridge is located on a private inholding within the Angeles National Forest along the East Fork Trail, an approximately five-mile hike to the closest road. From our beginnings in 1989, we have worked hard to provide our customers a special and unique recreational experience in the San Gabriel Mountains, and we have done so with the upmost regard to the environment and our customers' and the visiting public's welfare and safety. In addition to our bungee jumping customers, we have welcomed tens of thousands of members of the public who make the hike to my property each year. The hike to the Bridge to Nowhere is one of if not the most popular hike in the San Gabriel mountains. We understand the importance of allowing the public access to a special place of respite and fun in the wilderness located near (but wonderfully disconnected from) the hectic Los Angeles metroplex. Indeed, our record is impeccable. We have been environmental stewards of the canyon (picking up trash, removing graffiti, welcoming public access onto private property, providing first aid for the hiking public and their dogs in need of assistance and facilitating their emergency evacuation when necessary). We work closely with first responders (LA County Sheriff and LA County Fire) providing critical emergency communications links (initially, via satellite phone, today, via Starlink) to quickly access injured hikers.

Unfortunately, there are a few detractors who believe the CUP and Variance should not be approved. Attached is a letter from my legal counsel, Morgan Reed Law, that addresses issues raised by others over the last ten years. We hope you will agree with your staff that our CUP and Variance appropriately addresses these few opponents' concerns and should be approved.

I support staff's recommended findings and conditions of approval for this case, with two exceptions. It has taken a decade to process my application with a significant financial and emotional toll on me and my wife Gretchen. Staff's recommended conditions of approval for my CUP require the County to closely monitor my business to ensure strict compliance. With this in mind, and given the many years it has taken me to get

my application to a public hearing before your Commission, I respectfully request that your Commission approve a 30-year term for the CUP and Variance in lieu of the 20 years being recommended by staff's Draft and that you modify finding and condition numbers 29 and 7 as follows:

**Finding No. 29.** "The Commission finds that to ensure continued compatibility between the Project and the surrounding land uses, it is necessary to limit the CUP and Variance to a grant term of ~~20~~ 30 years."

**Condition No. 7.** "This grant shall terminate on September 11, ~~2044~~ 2054. Entitlement to use of the property thereafter shall be subject to the regulations then in effect..."

In addition, I request a slightly modified inspection schedule for the composting toilets. Rather than have the toilets inspected yearly, I request inspection every two years after the first two inspections. I have an excellent 35-year track record of environmental stewardship and will ensure the toilets will be taken care of well, and any issues repaired promptly. Due to my remote location, it is challenging for an inspector to easily reach the property to do the inspection. I request modification of the following CUP and Variance conditions number 31:

**Condition No. 31.** One year aAfter the inspection required by Condition 30, above, the certified industrial hygienist approved by the Director shall inspect the composting toilet system and submit a written report to the Director regarding the facility and whether it continues to meet the specifications for proper functioning at one-year intervals (i.e., eighteen (18) months after the composting toilet system is installed; ~~thirty (30) months after the composting toilet system is installed, etc.~~). Every two (2) years thereafter the certified industrial hygienist approved by the Director shall inspect the composting toilet system and submit a written report to the Director regarding the facility and whether it continues to meet the specifications for proper functioning.

My business's supporters and I very much look forward to addressing your Commission regarding my application at your upcoming September 11, 2024, public hearing for this case. Thank you very much for your consideration of my application, and my reasonable request to set a 30-year term for my associated land use permit approvals.

Best personal regards,

Ron Jones  
Founder and Owner, Bungee America, Inc.

Attachment

cc: Hon. Kathryn Barger, Supervisor, 5th District  
Anish Saraiya, Planning and Public Works Deputy to Hon. Kathryn Barger  
Amy Bodek, AICP, Director of LA County Planning





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September 5, 2024

Via E-mail: Mitch Glaser

Mitch Glaser  
Assistant Deputy Director of Regional Planning  
County of Los Angeles  
320 West Temple Street  
Los Angeles, CA 90012

**RE: SAUNDERS MINE RESPONSE TO PROJECT OPPOSITION**

Dear Mr. Glaser:

This letter addresses the opposition letters the County has received over the ten-year period the County has processed Saunders Mine's ("Applicant") Conditional Use Permit ("CUP") and Variance for Bungee Jumping at the Bridge to Nowhere ("Project"). The Assertions raised in these opposition letters and emails were addressed by the County or Applicant when received. Applicant requests that the Regional Planning Commission approve the CUP and Variance without reservation. Below is a summary of the issues raised by a small group of vocal opposition.

1. February 24, 2016, letter from Paul Ayers "Save the East Fork" opposing County granting Saunders Mine Clean Hands Waiver. Assertions: Bungee America operations are unsafe. The bridge is unsafe and has never been tested for this use. Bungee America does not provide safety instructions to participants. Bungee America has lost, abandoned, injured clients requiring assistance. Bungee America has no swift water rescue plan. Bungee America has no medic. Bungee America causes environmental damage. Bungee America has no ability to facilitate a medical evacuation. Bungee America illegally dumps human waste on-site. Bungee America maintains an 80-year-old outhouse which is leaking effluence into the River. Bungee America has failed to obtain a federally required Outfitter & Guide Permit from the USFS. Bungee America has appropriated "ALL" the parking. Bungee America's activities are not sustainable.

Reality: County issued Clean Hands Waiver and Clean Hands Waivers were repeatedly renewed throughout the life of the CUP application. Bungee America has a 35-year perfect safety record and both Bungee America's operations and the Bridge to Nowhere structure are inspected annually by the State of California Amusement Ride Division. Jumper safety instructions are provided and are a requirement of the State of California Amusement Ride Division. Swift water training, first aid training and environmental stewardship training have been standard operational procedures of Bungee America's for decades. Bungee America has satellite and/or Starlink cellular communication to emergency medical dispatch and an FAA approved heliport to facilitate medical evacuation. Bungee America has never dumped human waste or any waste on-site. Planning staff inspected the bathroom facilities and determined Bungee America does not have an 80-year-old outhouse which is leaking effluence into the river. Bungee America is not required to have an Outfitter & Guide permit under federal statutes because they are not conducting any outfitting and guiding operation on National Forest System lands. Bungee America's right to access includes ingress, egress, parking at the nearest public road and the use of their property for commercial purposes is protected by federal statute. Thirty-five years of a successful operation demonstrates significant sustainability.

2. April 14, 2017 – March 24, 2016, emails from Steve Kuchenski. Assertion: Opposes Clean Hands Waiver, Applicant cannot provide adequate parking. Reality: County granted Clean Hands Waiver and Variance will provide a parking waiver since Applicant cannot physically provide parking on-site.
3. April 13, 2018, email from Steve Kuchenski. Assertion: Applicant must provide private parking for its guests. Reality: County recommends Variance approval that will provide a parking waiver since Applicant cannot physically provide parking on-site.
4. October 26, 2018, email from Steve Kuchenski. Assertion: Parking issues and noise impacts. Reality: Variance approval will provide a parking waiver since Applicant cannot physically provide parking on-site. Project is exempt under the California Environmental Quality Act.
5. March 11, 2019, letter from Paul Ayers "Save the East Fork". Assertion: Opposing Applicant's use of heliport and Applicant's failure to apply for aviation permit with County. Reality: Applicant operating under Clean Hands Waiver which allows operations to continue until CUP and Variance are issued. On April 15, 2020 applicant received FAA approval of heliport. (See

Exhibit A). Applicant's CUP will provide required County approval for heliport.

6. April 3, 2020, and April 7, 2020, emails from Ben White. Assertion: Applicant's website advertising bungee jumping spots are available during pandemic shutdown; Applicant doesn't have permit for bathrooms. Reality: Applicant sent letter to County verifying Applicant's business was not open. (See Exhibit B). When Applicant resumed operations, the Clean Hands Waiver allowed operations to continue until CUP issued. Applicant's CUP will permit bathrooms.
7. June 2, 2020, and June 3, 2020, email from Ben White, Chair "Save the East Fork". Assertion: Applicant operating business during pandemic shutdown; Applicant doesn't have permit to operate heliport; Applicant doesn't have permit for bathrooms. Reality: Applicant sent letter to County verifying they were not open. (See Exhibit B). On April 15, 2020, applicant received FAA approval of heliport. (See Exhibit A). Applicant's CUP will provide required County permits for bathrooms and heliport.
8. February 15, 2022, letter from Ross Thomas. Assertion: Property is not appropriate for commercial use; Applicant needs a permit from the Forest Service; Applicant cannot post no-trespassing signs on Property; Project is a nuisance. Reality: In June of 2015, Board of Supervisors approved a zone change from A1 to CR, Commercial Recreation for the property. County processing CUP application for commercial use. No permit needed from Forest Service. Applicant can post no-trespassing signs on Applicant's Property. County is recommending approval of CUP.
9. February 15, 2022, email from Barry Sohl. Assertion: Applicant must provide separate parking for their guests; Applicant's guests litter; Applicant needs a permit from the Forest Service. Reality: Variance will provide a parking waiver. There is no evidence that Applicant's guests litter. No permit is needed from Forest Service.
10. February 16, 2022, letter from Geric Johnson, President, Angeles Volunteer Association. Assertion: Property is not appropriate for commercial use; Applicant needs a permit from the Forest Service; Applicant cannot post no-trespassing signs on Property; Project is a nuisance. Reality: In June of 2015, Board of Supervisors approved a zone change from A1 to CR, Commercial Recreation for the property. No permit needed from Forest Service. Applicant can post no-trespassing signs on Applicant's Property. County is recommending approval of CUP.

11. February 17, 2022, email from Amelia Borja. Assertion: Applicant cannot post no-trespassing signs on Property; Applicant needs to provide separate parking; Project is a nuisance. Reality: Applicant can post no-trespassing signs on own Property. Variance will provide a parking waiver. County is recommending approval of CUP.

12. August 19, 2024, email from Steve Anderson. Assertion: Bungee jumping should not be allowed in the wilderness. Increased trash, human waste, trail wear, lack of parking. Reality: Project is not in the wilderness, it is on private property owned by Applicant. Bungee America's right to access includes ingress, egress, parking at the nearest public road and the use of their property for commercial purposes as protected by federal statute.

Please contact us if you have any questions.

Sincerely,

A handwritten signature in cursive script, appearing to read "Cynthia Morgan-Reed".

CYNTHIA MORGAN-REED

Cc: LA County Regional Planning Commission  
Amy Bodek, AICP, Director of LA County Planning  
Hon. Kathryn Barger, Supervisor, 5<sup>th</sup> District  
Anish Saraiya, Planning and Public Works Deputy to Hon. Kathryn Barger



## Federal Aviation Administration

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### Memorandum

Date: April 15, 2020

To: Mark Steinbicker, Manager, Flight Technologies and Procedures Division  
ATTN: Richard Armstrong

**KEITH A** Digitally signed by KEITH A  
**FRABLE** FRABLE  
Date: 2020.04.16 12:59:42  
-07'00'

From: Keith A. Frable, Manager, Riverside Flight Standards District Office

Prepared by: Roy R. Peters, Principal Operations Inspector, (951) 276-6701x329

Subject: Heliport Evaluation Request, Azusa, CA (AWP-2020-1191-NRA)

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The attached proposal for the Bridge To Nowhere (BTNW) PPR Heliport, Azusa, CA was reviewed by Inspector Peters and is returned as requested. This office has no objection with one provision.

This is a proposed private day use heliport. This office recommends the following condition should be met prior to approval: Ensure unauthorized persons are restrained from access to the takeoff/landing area during helicopter flight operations by use of a non-obstructing safety barrier.

An evaluation of the proposed heliport located near the BTNW, Azusa, California, Case Number AWP-2020-1191-NRA, was conducted in accordance with FAA Order 8900.1, Volume 8, Chapter 3, Section 3. The completed Heliport Evaluations Checklist is attached along with the original case data sent to this office.

2 Attachments

### On-Site Heliport Evaluations Checklist Job Aid – AWP220

*NOTE:* Use this checklist to complete and confirm correct data on the FAA Form 7480-1.

Name of Proponent:	Ron Jones	Site ID (if known):	BTNW PPR Heliport (80756)
NRA Tracking #:	AWP-2020-1191-NRA	Date of Inspection:	04/13/2020

<b>1. Heliport Design</b>	
A. Duration of Use: <input checked="" type="checkbox"/> Permanent <input type="checkbox"/> Temporary	
B. <input checked="" type="checkbox"/> Ground Level Heliport <input type="checkbox"/> Water Heliport <input type="checkbox"/> Ship/Barge Heliport <input type="checkbox"/> Elevated Heliport	
C. Design helicopter to use the heliport:	Robinson R-44

<b>2. Proponent Contact Information</b>			
A. Name:	Ron Jones		
B. Address:	16654 Soledad Canyon Road #464, Canyon Country, CA 91387		
C. Telephone #:	(310) 923-6306	Fax #:	(310) 322-8892
D. Email Address:	gjones827@gmail.com		

<b>3. Location of Heliport – Use GPS to confirm the lat/long/elevation during on-site inspection.</b>			
A. Street Address	Bridge to Nowhere, San Gabriel Mountains		
B. City	Azusa	State	CA
C. Latitude:	34 ° 16 ' 55.00 " N	Longitude:	117 ° 44 ' 59.00 " W
D. Elevation:	2810 ft		

<b>4. Type of Use:</b>	
A. <input type="checkbox"/> Public Use <input checked="" type="checkbox"/> Private (PPR) <input type="checkbox"/> Private Use of Public Land/Waters	
B. <input checked="" type="checkbox"/> General Aviation Heliport <input type="checkbox"/> Transport Heliport <input type="checkbox"/> Hospital Heliport	
C. <input checked="" type="checkbox"/> VFR Use <input type="checkbox"/> IFR Use (Identify Approach) :	
D. <input checked="" type="checkbox"/> Day <input checked="" type="checkbox"/> Night	

<b>5. Dimensions of Surfaces – Confirm during on-site inspection – All measurements in feet</b>			
A. Touchdown and Liftoff Area	Length:	46 ft	Width: 46 ft
B. Final Approach & T.O. Area	Length:	85 ft	Width: 85 ft

C. Safety Area	Length:	15.5 ft	Width:	15.5 ft
D. Notes: Heliport is a circular design.				

6. Suitability of Approach/Takeoff Paths	
Note: Confirm that the 8:1 slope (7.125°) is satisfactory from the forward edge of the FATO to 4000 feet. All headings should be magnetic headings from the landing area using the center of the TLOF as the reference point.	
A. Prevailing winds?	Southwest
B. Satisfactory Ingress/Egress may be accomplished from all directions:	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
C. Satisfactory only in the following area:	SEE° to NOTES°
D. Additional satisfactory area or route:	N/A° to N/A°
E. No suitable ingress/egress routes exist under the present conditions	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
F. No other ingress/egress routes should be used	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Notes/Comments: Surveyed proponent's proposed ingress/egress routes (035/215 degrees MAG and 090/270 degrees MAG). Proposed routes SATISFACTORY.	

7. Landing Area Data – Note during on-site inspection	
A. Type of surface:	<input checked="" type="checkbox"/> Concrete <input type="checkbox"/> Asphalt <input type="checkbox"/> Metal <input type="checkbox"/> Water <input type="checkbox"/> Wood <input type="checkbox"/> Other
B. Weight Limit:	12000 lbs.
C. Approved Heliport Markings:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
D. Approved Heliport Lighting:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
E. Night Vision Goggle Ops Planned?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unknown
Notes/Comments: None.	

8. Other Heliport Data – Note during on-site inspection	
A. Heliport Beacon:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required
B. Communication Plan:	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
C. Does the Heliport have fire protection?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required
D. Describe the kind of fire protection (note if NFPA 418 approved): Portable fire extinguisher (Rating 20-A: 120-BC per combined NFPA 418 and California Fire Code Standards).	
E. Does the heliport have a wind direction indicator?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
F. Description (lit, location, visible from TLOF and 500 ft distance on final approach, etc.) One 12 ft tall windcone. Windcone externally lit with red obstruction light and 4 floodlights (FEC Heliports Model HP 0907-LED). Measured from TLOF, windcone is at 330 degrees (MAG) approximately 146 ft.	

9. Heliport Vicinity Data	
A. List any other landing areas within 5 nm of the site (Name, location ID, type (airport, heliport, seaplane), direction, and distance from the site: Brackett Field (KPOC) 4.75 NM 151 degrees (MAG).	
B. List any obstructions in the vicinity of the approach/departure protection area. Include recommended mitigation for obstructions that penetrate the 8:1, such as limited ingress/egress routes to avoid, removal, lowering, lighting, or marking the obstacle, etc. Two power poles penetrate Outbound Course 1 (departure heading 035 degrees MAG) transition area. Pole 1 is 033 degrees MAG, 734 ft from FATO. Power pole 2 is 011 degrees MAG, 841 ft from FATO. Both power poles penetrate the same side of the transition area. According to builder's plans, transitional surface penetrations to be marked with red obstruction lights. During the site survey, Los County Department of Public Works Dam Supervisor Stan Brown stated that all power poles in the vicinity of the heliport are to be removed and wires buried.	
List possible noise sensitive areas in the vicinity and direction/distance from site, such as schools, public areas, wildlife, etc. Residential neighborhood 222 degrees (MAG) 1.53 nm.	

10. State and Local Requirements	
A. Proponent informed to verify building permit and zoning rules met:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
B. Proponent informed to contact state aviation authorities:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
C. Proponent notified to address any environmental requirements?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

11. Does the heliport meet AC 150/5390-2B design criteria for:		
A. TLOF	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Reason:
B. FATO	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Reason:
C. Safety Area	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Reason:
D. VFR App/Dep Paths	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Reason:
E. MRI	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	Reason:
F. Wind Direction	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Reason:
G. Taxiways	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	Reason:
H. Helicopter Parking	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	Reason:
I. Markings	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Reason:
J. Lighting	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Reason:
K. Obstructions	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Reason:
L. Safety Enhancements	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	Reason:
M. Zoning/Land Use	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	Reason:

12. Conclusion	
A. In your opinion, can helicopter operations be conducted safely at the proposed site?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> Provisionally <input type="checkbox"/> No
B. List provisions for safe helicopter operations: None.	

Exhibit B

May 22, 2020 Covid Letter to Regional Planning



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**Bungee Experts Since 1989**

May 22, 2020            By Electronic Transmittal:

Amy Bodek  
Director of Regional Planning  
County of Los Angeles  
320 West Temple Street  
Los Angeles, CA 90012  
ABodek@planning.lacounty.gov

Dear Ms. Bodek,

Pursuant to requirement #3 of:  
Bungee America Clean Hands Waiver Extension  
RFS NO: 14-0002827/EF140610

In accordance with the County's Declaration of Emergency and the Covid-19 "Safer at Home" health order, Bungee America is not operating tours at the Bridge to Nowhere at this time.

Please be advised, our phone lines are operating and responding to customers questions, inquiries and requests to make future reservations. Additionally, we are using our social media platforms to encourage guests to pre-book reservations so that once re-opened in limited capacity, we will have guests to service.

The Covid-19 "Safer at Home" health order has hit Bungee America particularly hard. Our bungee jumping operations at the Bridge to Nowhere have been completely shut down per the County of Los Angeles since the order went into effect on or about March 19, 2020.

--  
Regards,  
Ron Jones  
Founder  
Bungee America  
B: 310-322-8892

**16654 Soledad Canyon Road, Suite 464 · Canyon Country, CA 91387 · Ph: 310-322-8892**  
**BungeeAmerica.com**

**SUPPLEMENTAL REPORT TO THE REGIONAL PLANNING COMMISSION**

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DATE ISSUED: September 10, 2024

HEARING DATE: September 11, 2024                      AGENDA ITEM: 9

PROJECT NUMBER: 2018-003069-(5)

PERMIT NUMBER(S): Conditional Use Permit RPPL2018004676  
Variance RPPL2018004861

SUPERVISORIAL DISTRICT: 5

PROJECT LOCATION: Assessor's Parcel Numbers 8678-002-015 and  
8678-002-016

OWNER: Saunders Mine LLC

APPLICANT: Bungee America, Inc.

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The above-identified item is a request for:

- A Conditional Use Permit to authorize an amusement ride (bungee jumping), a private heliport, and overnight camping with appurtenant facilities (a container used as a hangar to store a helicopter, two storage containers, a storage building, an office, a security booth, a restroom building with composting toilets, a removable shade canopy, a directional/informational sign, and fencing) ("Project") in the C-R (Commercial Recreation) Zone pursuant to County Code Section 22.20.030 (Land Use Regulations for Commercial Zones).
- A Variance to waive the parking requirements for the Project pursuant to County Code Section 22.194.020 (Variances – Applicability).

Additional correspondence has been received by Staff in the time since the supplemental report to the Regional Planning Commission dated September 5, 2024 was provided to you. This correspondence is attached.

---

Report  
Reviewed By:   
Samuel Dea, Supervising Regional Planner

Report  
Approved By:   
Mitch Glaser, Assistant Deputy Director

---

Attachment: Correspondence

Via email c/o: Richard Claghorn: [rclaghorn@planning.lacounty.gov](mailto:rclaghorn@planning.lacounty.gov)  
8 September 2024

Assistant Deputy Director of Regional Planning  
County of Los Angeles  
320 W. Temple Street  
Los Angeles, CA 90012

**RE: Project No. 2018-003069-(5), Bungee America, inc. (RPC public hearing date September 11, 2024, agenda item 9), comments on Supplemental Hearing Package**

I have read the response letter from Ron Jones, Founder and Owner of Bungee America dated 9/5/2024, and the letter from Cynthia Morgan-Reed dated 9/5/2024, of which items #2-4 were a response to my earlier letter opposing the Clean Hands Waiver, and which characterized me as being in opposition to the project. Please be advised that I am not opposed to Bungee America operating at the Bridge to Nowhere.

Instead, I have previously expressed limited and focused concerns about the Clean Hands Waiver process, and I have specific concerns that the CEQA Categorical Exemption is an inappropriate mechanism for this project, as noted below. The Categorical Exemption results in a lack of further study regarding either transportation or parking alternatives for the customers of Bungee America, and in my opinion fails to address or mitigate environmental impacts.

The CEQA Categorical Exemption is proposed by staff based on Class 1, 3, 5, 23, and in my opinion it does not qualify under those classes and is not eligible for Categorical Exemption, as follows.

**Class 1 Existing Facilities:**

- Per CCR §15301, Class 1 consists of the operation, repair, maintenance, permitting, leasing, licensing, or minor alteration of existing public or private structures, facilities, mechanical equipment, or topographical features, involving negligible or no expansion of existing or former use.
- It is inappropriate to consider the amusement park use as “existing”, because the bridge was first constructed for use as transportation infrastructure. The amusement park use commenced in 1993, and was NOT in place before CEQA was passed in 1970, therefore the amusement use cannot be considered existing under Class 1. The use and its related traffic impact from customers has never been analyzed under CEQA for traffic/parking impacts.

**Class 3 New Construction or Conversion of Small Structures**

- Per CCR §15303, Class 3 consists of construction and location of limited numbers of new, small facilities or structures; installation of small new equipment and facilities in small structures; and the conversion of existing small structures from one use to another where only minor modifications are made in the exterior of the structure.
- The proposed accessory structures are relatively small, however, the large former bridge / proposed amusement park structure which has undergone the conversion / change of use (see Class 1) is not small.

#### Class 5 Minor Alterations in Land Use Limitations

- Per CCR §15305, Class 5 consists of minor alterations in land use limitations in areas with an average slope of less than 20%.
- The average slope at Bungee America was not stated in the CEQA analysis, but as a bridge over a river canyon, it likely exceeds 20%.

#### Class 23 Normal Operations of Facilities for Public Gatherings

- Per CCR §15323, Class 23 consists of the normal operations of existing facilities for public gatherings for which the facilities were designed, where there is a past history of the facility being used for the same or similar kind of purpose.
- As previously discussed in Class 1, the existing bridge facility was designed as transportation infrastructure, not as an amusement park, and the amusement use did not exist at the time CEQA was passed in 1970.

Due to staff's recommendation of Categorical Exemption, no further study has yet been conducted regarding the customer traffic impacts to the National Monument. I agree that as an inholding on federal land, the *Owner and Owner's employees* are entitled to reasonable access. However, I do not believe that automatically grants an entitlement to parking on National Monument land for *customers* of a business use that is under County jurisdiction.

The applicant has described themselves as a USFS approved vendor; this is due to their sale of parking passes ("Adventure Pass"). It is worth noting that other recreational vendors that utilize federal lands (for example, whitewater rafting companies on forest lands) typically have to obtain permits for the use, and develop transportation alternatives (such as shuttle buses) to mitigate traffic impact at trailheads, put-ins and take-outs. Due to the nature of this inholding, the appropriate mechanism to investigate the parking impacts of a county regulated use on adjacent federal land is the CEQA study process.

Despite the lack of further CEQA study related to the proposed variance, there is data available on the parking impacts and potential alternatives. Watershed Conservation Authority (WCA) is a local public entity of the State of California exercising joint powers of the San Gabriel and Lower Los Angeles Rivers and Mountains Conservancy (RMC) and the Los Angeles County Flood Control District. In 2014, the year that Bungee America was first issued a Notice of Violation, the WCA conducted visitor surveys of the East Fork San Gabriel River area<sup>i</sup>, including the National Monument East Fork Overlook / Trailhead Parking Area intended to be utilized for customer parking.

- A 2016 Parking Distribution Map showed the future potential for 7 spaces at the overlook; 68 standard spaces and 3 bus spaces at the Trailhead Parking Area; and 26 spaces along the Camp Bonita Road<sup>ii</sup>.
- Final Conceptual plans include a shuttle stop at the East Fork Overlook<sup>iii</sup>.
- The WCA has prepared a 2-volume Final EIS-EIR related to visitor improvements, including parking improvements and transportation alternatives<sup>iv</sup>.
- U.S. Rep. Judy Chu has helped secure funding for a shuttle from Metro light rail stations to shuttle stops in USFS locations<sup>v</sup>.

In addition to the research, planning and funding by the WCA of parking improvements and alternatives (including bus parking and shuttle service), in the period of time since the 2014 Notice of Violation, the exponential growth of Ridesharing companies (Uber, Lyft, etc.) provides another alternative for the applicant to explore the possibility of packaging customer transportation services into the bungee recreational experience.

In my opinion, these alternatives do not appear to have been researched or referenced in the CUP, Variance or CEQA evaluation, due to the CEQA Exemption foreclosing further study. It is worth noting that Bungee America encourages its customers to park at the trailhead at 6-7am, so most of the existing parking spaces are not available for families that arise later in the morning, whose children are accustomed to starting their weekdays/school days later than 6am.

The East Fork of the San Gabriel River is a valuable resource for wilderness recreation by LA County residents. Along with our county beaches, it is one of the few egalitarian recreational spaces that provide cool aquatic relief from summer heat, and an opportunity for residents of all demographics and socioeconomic backgrounds to explore and appreciate nature. I appreciate that Bungee America can be part of this introduction to wilderness recreational experiences for demographics that can afford to pay for the experience. I simply ask that the transportation impacts not be categorically exempted and dismissed via CEQA.

With further study and coordination with other stakeholders in the area, it is possible that a Mitigated Negative Declaration, with conditions for further cooperation on transportation and parking alternatives to mitigate the above-mentioned concerns would, in my opinion, result in a more successful use of both Bungee America's property, and a more just and equitable use of limited parking resources at the surrounding the National Monument facilities.

Sincerely,

Steve Kuchenski

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<sup>i</sup> [2014\\_SGR\\_Visitor\\_Use\\_Preliminary\\_Report\\_final.pdf \(d3n8a8pro7vhmx.cloudfront.net\)](#)

<sup>ii</sup> [Parking\\_Distribution\\_web.pdf \(d3n8a8pro7vhmx.cloudfront.net\)](#)

<sup>iii</sup> [FINAL\\_SUMMARY\\_PLAN.ai \(d3n8a8pro7vhmx.cloudfront.net\)](#)

<sup>iv</sup> [San Gabriel River Confluence with Cattle Canyon Improvements Project - Watershed Conservation Authority](#)

<sup>v</sup> <https://archive.is/DpO0M>

**From:** [Park, Bobby@DIR](mailto:Park.Bobby@DIR)  
**To:** [Richard Claghorn](mailto:Richard.Claghorn)  
**Cc:** [RJBungee@gmail.com](mailto:RJBungee@gmail.com)  
**Subject:** Bungee America's CUP and Variance applications to authorize its continued use of commercial bungee operations at the "Bridge to Nowhere"  
**Date:** Monday, September 9, 2024 2:34:55 PM

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**CAUTION:** External Email. Proceed Responsibly.

Los Angeles County Department of Regional Planning  
c/o Planner Richard Claghorn

Project No.: 2018-003069; Project Location: East Fork Trail within the Antelope Valley Planning Area

Hon. Regional Planning Commissioners:

I have been alerted to a public hearing on September 11, 2024, during which your Commission will consider the above zoning application pertaining to Bungee America's request to continue its longstanding commercial bungee jumping operations at the Bridge to Nowhere on the East Fork Trail in Azusa Canyon. I am writing in support of your approval of the CUP and Variance. Over the past 24 years, as I have been with Cal/OSHA's Amusement Ride and Tramway Unit, which oversees the regulatory safety compliance of the bungee jumping operation, it is clear Bungee America has developed a unique recreational experience. Starting with the early morning hike, the natural beauty of the chaparral, rock formations, wildlife, and river punctuated upon arrival at the bridge is truly incredible! The arch bridge design is fascinating, and I appreciate its attractive, functional architecture. The bridge's current condition is remarkable, and while it is dated by design and literally stamped, it does not show its age. Considering that Bungee America is the only legally operating bungee jumping operation in the State, it would be a shame if Los Angeles County's approval was not granted. The inspection reports from my office confirm the favorable safety and compliance history, which has been a key factor in the operation's success. If Los Angeles County would like to receive copies, I am happy to provide them.

Thank you for considering my comments.

Bobby L. Park Jr.  
Principal Safety Engineer, QSI  
Statewide Program Manager  
Cal/OSHA Amusement Ride and Tramway Unit  
2 MacArthur Place, Suite 700  
Santa Ana, CA 92707  
714-567-7211 Office  
[www.dir.ca.gov/dosh/ARoffices.htm](http://www.dir.ca.gov/dosh/ARoffices.htm)



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September 10, 2024

Via E-mail: Richard Claghorn

Hon. Regional Planning Commissioners  
c/o Richard Claghorn  
Principal Planner, North County Development Services Regional Planning  
County of Los Angeles  
320 West Temple Street  
Los Angeles, CA 90012

**RE: BUNGEE AMERICA’S RESPONSE TO STEVE KUCHENSKI’S SEPTEMBER 8, 2024  
OPPOSITION LETTER**

Dear Hon. Regional Planning Commissioners:

This letter addresses Mr. Kuchenski’s September 8, 2024 letter opposing the County’s CEQA determination for Bungee America’s (“Applicant”) Conditional Use Permit (“CUP”) and Variance for Bungee Jumping at the Bridge to Nowhere (“Project”).

Applicant agrees with the County’s CEQA exemptions determination. This letter addresses Mr. Kuchenski’s objections and further clarifies how the CEQA exemptions apply.

1. CEQA Exemption 1: Existing Facilities

Mr. Kuchenski believes Bungee America’s amusement ride use cannot qualify as an “existing use” because the use did not exist prior to CEQA’s enactment in 1970. Fortunately, that is not how “existing use” is analyzed under CEQA Exemption 1. The use must only exist prior to the CEQA analysis being performed, not prior to when CEQA was enacted. Mr. Kuchenski’s analysis would result in only projects that existed for the last fifty-four years or more being eligible for the exemption. This is not what the legislature intended.

## 2. Class 3 New Construction or Conversion of Small Structures

Mr. Kuchenski believes this exemption under CEQA should not apply because the Bridge to Nowhere is a large structure and is not small. Mr. Kuchenski is correct regarding the size of the bridge. However, the bridge is not at issue because there is no construction or conversion involving the bridge. The exemption applies to the new construction of the composting toilet facility, guard shack, fencing, gate, signage, and roofs with solar panels on existing structures. The existing outhouse will be converted to a storage facility. The bridge is not being converted or constructed upon. Under CEQA, such small constructions and the conversion are exempt.

## 3. Class 5 Minor Alterations in Land Use Limitations

Mr. Kuchenski argues that this exemption cannot apply because the average slope at Bungee America was not stated in the CEQA analysis, but as a bridge over a river canyon, it likely exceeds 20%. The exemption allows for an average of less than 20% slope over the entire project site, not just the bridge. The land use limitation being imposed is the issuance of the Conditional Use Permit for the project site. Under this exemption, projects that do not result in any changes to land use or density may be considered exempt from CEQA. There will be no changes to land use or density as the Conditional Use Permit includes density limitations for the number of visitors.

## 4. Class 23 Normal Operations of Facilities for Public Gatherings

Mr. Kuchenski argues, similar to his argument under the Class 1 exemption, that the existing bridge facility was designed as transportation infrastructure, not as an amusement park, and the amusement use did not exist at the time CEQA was passed in 1970. Again, Mr. Kuchenski's argument is not reflective of how these CEQA exemptions apply. CEQA applies to the existing use and the existing use of the bridge is for bungee jumping, which is an amusement ride. An amusement ride is where the public gathers and is thus exempt.

Mr. Kuchenski expands his arguments beyond CEQA to take umbrage at the fact that Bungee America is not required to obtain permits for its use from the forest service. He argues that like whitewater rafting outfitters, the forest service should issue permits for Bungee America's use and Bungee America be required to provide transportation and parking alternatives. However, unlike most other outdoor outfitters, Bungee America's use occurs on its own property. Furthermore, as outlined in our September 5, 2024 response to opposition letters, federal law protects Bungee America's right

to access including ingress, egress, parking at the nearest public road and the use of the property for commercial purposes.

The remainder of Mr. Kuchenski's letter states how he believes Bungee America should address its parking problem. We disagree with the categorization that there is a parking problem and agree with the County's determination that there are adequate parking facilities at the trailhead to accommodate Bungee America's use. The parking variance addresses the unique circumstance of this property and further ameliorates parking and traffic concerns.

We are happy to answer your questions.

Sincerely,

A handwritten signature in black ink that reads "Cynthia Morgan-Reed". The signature is written in a cursive, flowing style.

CYNTHIA MORGAN-REED

Cc: Amy Bodek, AICP, Director of LA County Planning  
Hon. Kathryn Barger, Supervisor, 5<sup>th</sup> District  
Anish Saraiya, Planning and Public Works Deputy to Hon. Kathryn Barger



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**Mitchell M. Tsai**  
Law Firm

139 South Hudson Avenue  
Suite 200  
Pasadena, California 91101

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**VIA E-MAIL**

September 10, 2024

Regional Planning Commission  
County of Los Angeles  
320 W. Temple St., Room 150  
Los Angeles, CA 90012

Em: [comment@planning.lacounty.gov](mailto:comment@planning.lacounty.gov)

**RE: County of Los Angeles Regional Planning Commission,  
Conditional Use Permit No. RPPL2018004676 and Variance No.  
RPPL2018004861 (Agenda Item No. 9).**

Dear Chairperson Pam O'Connor, Vice Chair David W. Louie, Commission Secretary Elida Luna, and Honorable Commissioners,

On behalf of the Save the East Fork Association, my Office is submitting these comments for the County's ("**County**") Agenda Item No. 9, a discussion on Conditional Use Permit No. RPPL2018004676 and Variance No. RPPL2018004861 for the Bridge to Nowhere commercial bungee jumping operation ("**Project**").

Save The East Fork Association was created to work with the various governmental agencies and conservation groups to improve recreation and safety, and advocating for the watershed and protected habitat along the East Fork of the San Gabriel River.

The County Regional Planning Commission should vote to deny the Project. The Project would permit the operation of an amusement park in a Very High Fire Hazard Severity Zone that is at present closed due to the Bridge Fire. To allow the operation of an amusement park, welcoming a large amount of visitors, in a fire prone wilderness area with limited means of ingress or egress without even so much as an evacuation plan approved by the County of Los Angeles Fire Department exacerbates fire risks from human activities and is unsafe to the general public.

In addition, the County is proposing to approve the Project without a required State Heliport license in violation of State law. Finally, the County is unlawfully proposing to exempt the Project from CEQA environmental review.

## I. BACKGROUND

Project No. 2018-003069-(5) is a private inholding within the Angeles National Forest also known as the Bridge to Nowhere Antelope Valley Planning Area. The applicant seeks a Conditional Use Permit (No. RPPL2018004676 ) to authorize an amusement ride (bungee jumping), a private heliport, and overnight camping with appurtenant facilities (a container used as a hangar to store a helicopter, two storage containers, a storage building, an office, a security booth, restroom building with composting toilets, a removable shade canopy, a directional/informational sign, and fencing), as well a Parking Variance (No. RPPL2018004861) to waive all required parking.

Per the Staff Report, the applicant has been in operation since 1989. (Staff Report, p. 5.) They operated without any permitting for the first four years. (*Id.*) In 1993, the applicant sought permits with the State of California Department of Industrial Relations' Division of Occupational Safety and Health. (*Id.*)

However, the Bungee America did not obtain the necessary CUP for the operation as required by Los Angeles County Code Section 22.20.030 (Land Use Regulations for Commercial Zones). The applicant was first notified of their failure to obtain the necessary permits on May 8, 2014, when Staff issued a Notice of Violation for maintaining amusement rides (bungee jumping and a zipline) and appurtenant facilities (cargo containers).

## II. THE PROJECT WOULD BE APPROVED IN VIOLATION OF THE CALIFORNIA ENVIRONMENTAL QUALITY ACT

### A. Background Concerning the California Environmental Quality Act

The California Environmental Quality Act is a California statute designed to inform decision-makers and the public about the potential significant environmental effects of a project. 14 California Code of Regulations (“**CEQA Guidelines**”), § 15002, subd. (a)(1).<sup>1</sup> At its core, its purpose is to “inform the public and its responsible officials of

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<sup>1</sup> The CEQA Guidelines, codified in Title 14 of the California Code of Regulations, section 15000 et seq., are regulatory guidelines promulgated by the state Natural Resources Agency for the implementation of CEQA. Cal. Pub. Res. Code, § 21083. The CEQA Guidelines are given “great weight in interpreting CEQA except when . . . clearly unauthorized or erroneous.” *Center for Biological Diversity v. Dept. of Fish & Wildlife* (2015) 62 Cal.4th 204, 217.

the environmental consequences of their decisions *before* they are made.” *Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal.3d 553, 564.

1. *Background Concerning Environmental Impact Reports*

CEQA directs public agencies to avoid or reduce environmental damage, when possible, by requiring alternatives or mitigation measures. CEQA Guidelines, § 15002, subds. (a)(2)-(3); see also *Berkeley Keep Jets Over the Bay Committee v. Board of Port Comes* (2001) 91 Cal.App.4th 1344, 1354; *Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal.3d 553; *Laurel Heights Improvement Assn.*, 47 Cal.3d at p. 400. The EIR serves to provide public agencies and the public in general with information about the effect that a proposed project is likely to have on the environment and to “identify ways that environmental damage can be avoided or significantly reduced.” CEQA Guidelines, § 15002, subd. (a)(2). If the project has a significant effect on the environment, the agency may approve the project only upon finding that it has “eliminated or substantially lessened all significant effects on the environment where feasible” and that any unavoidable significant effects on the environment are “acceptable due to overriding concerns” specified in Public Resources Code section 21081. See CEQA Guidelines, § 15092, subds. (b)(2)(A)-(B).

While the courts review an EIR using an ‘abuse of discretion’ standard, the reviewing court is not to *uncritically* rely on every study or analysis presented by a project proponent in support of its position. *Berkeley Jets*, 91 Cal.App.4th at p. 1355 (quoting *Laurel Heights Improvement Assn.*, 47 Cal.3d at pp. 391, 409 fn. 12) (internal quotations omitted). A clearly inadequate or unsupported study is entitled to no judicial deference. *Id.* Drawing this line and determining whether the EIR complies with CEQA’s information disclosure requirements presents a question of law subject to independent review by the courts. *Sierra Club v. County of Fresno* (2018) 6 Cal.5th 502, 515; *Madera Oversight Coalition, Inc. v. County of Madera* (2011) 199 Cal.App.4th 48, 102, 131. As the court stated in *Berkeley Jets*, prejudicial abuse of discretion occurs if the failure to include relevant information precludes informed decision-making and informed public participation, thereby thwarting the statutory goals of the EIR process. 91 Cal.App.4th at p. 1355 (internal quotations omitted).

The preparation and circulation of an EIR is more than a set of technical hurdles for agencies and developers to overcome. *Communities for a Better Environment v. Richmond* (2010) 184 Cal.App.4th 70, 80 (quoting *Vineyard Area Citizens for Responsible Growth, Inc. v. City of Rancho Cordova* (2007) 40 Cal.4th 412, 449-450). The EIR’s function is to

ensure that government officials who decide to build or approve a project do so with a full understanding of the environmental consequences and, equally important, that the public is assured those consequences have been considered. *Id.* For the EIR to serve these goals it must present information so that the foreseeable impacts of pursuing the project can be understood and weighed, and the public must be given an adequate opportunity to comment on that presentation before the decision to go forward is made. *Id.*

A strong presumption in favor of requiring preparation of an EIR is built into CEQA. This presumption is reflected in what is known as the “fair argument” standard under which an EIR must be prepared whenever substantial evidence in the record supports a fair argument that a project may have a significant effect on the environment. *Quail Botanical Gardens Found., Inc. v. City of Encinitas* (1994) 29 Cal.App.4th 1597, 1602; *Friends of “B” St. v. City of Hayward* (1980) 106 Cal.3d 988, 1002.

The fair argument test stems from the statutory mandate that an EIR be prepared for any project that “may have a significant effect on the environment.” PRC, § 21151; see *No Oil, Inc. v. City of Los Angeles* (1974) 13 Cal.App.3d 68, 75; accord *Jensen v. City of Santa Rosa* (2018) 23 Cal.App.5th 877, 884. Under this test, if a proposed project is not exempt and may cause a significant effect on the environment, the lead agency must prepare an EIR. PRC, §§ 21100 (a), 21151; CEQA Guidelines, § 15064 (a)(1), (f)(1). An EIR may be dispensed with only if the lead agency finds no substantial evidence in the initial study or elsewhere in the record that the project may have a significant effect on the environment. *Parker Shattuck Neighbors v. Berkeley City Council* (2013) 222 Cal.App.4th 768, 785. In such a situation, the agency must adopt a negative declaration. PRC, § 21080, subd. (c)(1); CEQA Guidelines, §§ 15063 (b)(2), 15064(f)(3).

“Significant effect upon the environment” is defined as “a substantial or potentially substantial adverse change in the environment.” PRC, § 21068; CEQA Guidelines, § 15382. A project may have a significant effect on the environment if there is a reasonable probability that it will result in a significant impact. *No Oil, Inc.*, 13 Cal.3d at p. 83 fn. 16; see *Sundstrom v. County of Mendocino* (1988) 202 Cal.App.3d 296, 309. If any aspect of the project may result in a significant impact on the environment, an EIR must be prepared even if the overall effect of the project is beneficial. CEQA Guidelines, § 15063(b)(1); see *County Sanitation Dist. No. 2 v. County of Kern* (2005) 127 Cal.App.4th 1544, 1580.

This standard sets a “low threshold” for preparation of an EIR. *Consolidated Irrigation Dist. v. City of Selma* (2012) 204 Cal.App.4th 187, 207; *Nelson v. County of Kern* (2010) 190 Cal.App.4th 252; *Pocket Protectors v. City of Sacramento* (2004) 124 Cal.App.4th 903, 928; *Bowman v. City of Berkeley* (2004) 122 Cal.App.4th 572, 580; *Citizen Action to Serve All Students v. Thornley* (1990) 222 Cal.App.3d 748, 754; *Sundstrom*, 202 Cal.App.3d at p. 310. If substantial evidence in the record supports a fair argument that the project may have a significant environmental effect, the lead agency must prepare an EIR even if other substantial evidence before it indicates the project will have no significant effect. See *Jensen*, 23 Cal.App.5th at p. 886; *Clews Land & Livestock v. City of San Diego* (2017) 19 Cal.App.5th 161, 183; *Stanislaus Audubon Society, Inc. v. County of Stanislaus* (1995) 33 Cal.App.4th 144, 150; *Brentwood Assn. for No Drilling, Inc. v. City of Los Angeles* (1982) 134 Cal.App.3d 491; *Friends of “B” St.*, 106 Cal.App.3d 988; CEQA Guidelines, § 15064(f)(1).

2. *The Proposed CEQA Exemptions Are Not Applicable to the Project.*

The hearing packet identifies four CEQA exemptions for the Project: (1) Class 1 (Existing Facilities), (2) Class 3 (New Construction or Conversion of Small Structures), (3) Class 5 (Minor Alterations in Land Use Limitations), and (4) Class 23 (Normal Operations of Facilities for Public Gatherings). However, as explained below, none of these exemptions are suitable for the Project.

Although CEQA creates strong presumption in favor of requiring the preparation an EIR, it enumerates certain limited categories of activities exempt from the requirement to prepare an EIR. Those “categorical exemptions” and the criteria a project must meet to fit within them are listed in section 15301 through 15333 of the CEQA Guidelines. Categorical exemptions are narrowly construed to afford the fullest possible environmental protection. See *Save Our Carmel River v. Monterey Peninsula Water Management Dist.* (2006) 141 Cal.App.4th 677, 697). Furthermore, even projects that technically fit the criteria of a categorical exemption might nevertheless be excepted from relying on them for a variety of reasons enumerated at CCR § 15300.2. If a project does not fit the criteria of a categorical exemption, or if it meets the criteria of a categorical exemption but is excepted from relying on the exemption pursuant to CCR § 15300.2, the City must evaluate the project through an EIR or other CEQA analysis. As such, an EIR must be prepared prior to the issuance of the CUP or Variance.

3. *The Project is Ineligible for a Class 1 Existing Facilities Exemption.*

The key consideration for a Class 1 Exemption is whether the project involves negligible or no expansion of the scope of existing or former use. (CEQA Guidelines, § 15301.) And while the size or scope of the existing facility is not determinative of whether the exemption may stand, the *scope of the expansion is*. (See *World Business Academy v. State Lands Com.* (2018) 24 Cal.App.5th 476.)

While a Project that repairs or maintains a facility falls within the Existing Facilities Exemption, a decision to expand or improve a facility does not. *Erven v. Board of Supervisors* (1975) 53 Cal. App. 3d 1004 ("Should the Board decide in the future to widen existing public roads or to acquire private road easements, by condemnation or dedication, and improve them, such actions would not qualify for exemption and compliance with the CEQA would be required either by the preparation and consideration of an environmental impact report or by a negative declaration.").

The County has the burden of demonstrating with “substantial evidence” that the Project fits within the Existing Facilities Exemption. See *Save Our Big Trees v. City of Santa Cruz* (2015) 241 Cal. App. 4th 694, 705. Moreover, the Existing Facilities Exemption is strictly and narrowly construed. *Co. of Amador v. El Dorado Co. Water Agency* (1999) 76 Cal. App. 4th 961, 966 – 967. *Azusa Land Reclamation Co., supra*, 52 Cal. App. 4th at 1192 (“a term that does not have a clearly established meaning, such as the exemption for existing ‘facilities,’ should not be so broad interpreted. . . .”).

“The apparent rationale for the existing facilities exemption is that the environmental effects of the operation of such facilities must already have been considered.” *Azusa Land Reclamation Co., supra*, 52 Cal. App. 4th at 1195; see also *Lewis v. Seventeenth District Agricultural Ass’n* (1985) 165 Cal.App.3d 823, 837 (“The purpose of the categorical exemption . . . . is aimed at preventing a duplication in evaluations.”); *Bloom v. McGurk* (1994) 26 Cal. App. 4th 1307, 1313 - 1314 (citing *Committee for a Progressive Gilroy. State Water Resources Control Bd.* (1987) 192 Cal. App. 3d 847, 864) (“a facility does not 'exist' within the meaning of the class 1 exemption unless it predates the enactment of CEQA or was originally implemented in compliance with CEQA.”).

In this case, Bungee America has never had any right to operate the commercial bungee jumping operation or associated heliport and outhouse without a CUP. While the applicant has previously requested a Clean Hands Waiver after receiving a Notice of Violation from the County, no clear environmental review has been performed to

properly establish a baseline. Importantly, the baseline years of 2013-2015, as referenced in the Staff Report, seem to be an arbitrary set of dates without clear reasoning other than the existence of logbooks. However, the provided materials for the hearing fail to include the referenced logbooks which are necessary to determine if the number of visitors and trips included in the Conditions for Approval are appropriate for the site or would constitute an expanded scope.

Further, Staff Report identifies numerous changes to the facilities from the 2013-2015 baseline stated in the staff report, including a new 160-square-foot restroom building with composting toilets, a new 80-square-foot security booth, new fencing, a new gate, new signage, new roofs with solar panels, and the conversion of the existing outhouse into a storage structure.” (Staff Report, p. 9). The Staff Report fails to identify what the scope of these changes will be in comparison with the baseline years.

As this facility has yet to go through environmental review, a Class 1 Exemption is improper.

4. *Class 23 Exemption – Normal Operations of Facilities for Public Gatherings*

The LA County CEQA Guidelines, Appendix G include the County’s definition of a Class 23 Exemption as “consist[ing] of the normal operations of existing facilities **for public gatherings for which the facilities were designed**, where there is a past history of the facility being used for the same kind of purpose.” By this definition, it is clear that this operation is outside of the intended use of this CEQA Exemption. The Bridge to Nowhere was **never intended** to become a bungee jumping operation, but rather was a portion of a larger road expansion project that was ultimately abandoned due to flooding (Staff Report, p. 5.)

A Class 23 Exemption is further inapplicable as the proposed use far from “public gathering facility” as supported by the examples included in the County’s CEQA Guidelines Appendix G. “Facilities included within this exemption include, but are not limited to, racetracks, stadiums, convention centers, auditoriums, community centers, amphitheaters, planetariums, swimming pools, parks and beaches.” Each of these facilities, notably, are able to accommodate large numbers of people and usually have inclusive accessibility features. The proposed use is far from a “public gathering facility” and inherently would not be considered a normal operation for which the facilities were originally designed. As such, the Class 23 Exemption cannot be applied to this case.

5. *The exceptions outlined in CEQA Guidelines Section 15300.2 apply to the Project.*

The CEQA Guidelines clearly allow for exceptions to the categorical exemptions in six areas, based on (1) location, (2) cumulative impact, (3) significant effect, (4) scenic highways, (5) hazardous waste sites, and (6) historical resources. (CEQA Guidelines Section 15300.2.) As applied to the proposed Project, the location-based exception and significant effect exception are both clearly applicable.

Exceptions based on the first category, location, are limited to Classes 3, 4, 5, 6, and 11. Importantly, this exception exists because “a project that is ordinarily insignificant in its impact on the environment may *in a particularly sensitive environment* be significant.” (*Id.*) This Project seeks two CEQA Class Exemptions, 3 and 5, which are subject to the location limitations.

The Project is located within the Sheep Mountain Wilderness (Est. in 1984) and San Gabriel National Monument (Est. in 2014, expanded in 2024). While the bridge itself is privately owned, access to the site requires the use of these sensitive environmental areas.<sup>2</sup> The area surrounding the Project site is rich with sensitive environmental species and habitat.<sup>3</sup> The unique nature of the Project Site means that Class 3 and 5 Exemptions cannot apply to the Project.

Further, all Class Exemptions are inapplicable in areas where there is “a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances.” (CEQA Guidelines Section 15300.2.) Here, the unusual circumstances are clear as the use of the site for commercial recreation increases the level of human disturbance on the Sheep Mountain Wilderness and San Gabriel National Monument.

By increasing the number of people who would otherwise use the East Fork Trail and relying on a helicopter to supply the business and remove the generated waste products, the Project inherently increases the stressors on a critical environment. The

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<sup>2</sup> The East Fork Trail requires a wilderness permit for access. *See* United States Department of Agriculture – Forest Service; available at: <https://www.fs.usda.gov/detail/angeles/specialplaces/?cid=stelprdb519461>

<sup>3</sup> *See* President Biden’s Proclamation on Expanding the San Gabriel National Monument (outlining the various sensitive species within the national monument); available at: <https://www.whitehouse.gov/briefing-room/presidential-actions/2024/05/02/a-proclamation-on-expanding-the-san-gabriel-mountains-national-monument-2024/>

proposed uses would increase local GHG emissions through the helicopter use, create noise pollution for the nearby wildlife, and impact the biological resources in the area, resulting in clear significant impacts. The Commission must perform an environmental review of the project before granting the CUP or Variance applications.

### III. **THE CUP CANNOT BE GRANTED WITHOUT A STATE HELIPORT PERMIT**

It is unlawful to operate a heliport in the State of California without a State Heliport Permit. The State Aeronautics Act (California Public Utilities Code (PUC), Section 21001 et seq.) and the California Code of Regulations (CCR), Title 21, Sections 3525-3560, outline the requirements for permitting a heliport. Importantly, that unless specified in the law otherwise, the use of the word “airport” is interchangeable with “heliport.” Under the PUC Section 21663, it is unlawful for “any person to operate an airport unless an appropriate airport permit required by rule of the Department has been issued by the Department and has not subsequently been revoked.”

The materials for the CUP application show that a FAA checklist has been performed for the private use of the helicopter but fails to show that the applicant has received a permit for the *commercial* operation of the helicopter. Under PUC Section 21662 and CCR Section 3533, a personal use heliport is only exempt from obtaining a state permit when using a heliport for private, *non-commercial* use in an unincorporated area meeting the safety standards established by Article 5 of CCR Section 3560.

As noted in the Staff Report, “The helicopter flights are for logistical support, such as carrying equipment and supplies and removing waste and trash from the Project Site.” (Staff Report, p. 7.) Thus, the use of the helicopter is clearly to support the commercial bungee jumping activity. The proper classification for the heliport would be a special-use site<sup>4</sup>, which requires permitting by the Department of Transportation Aeronautics Division prior to use.

The CUP must not be granted until the applicant has obtained all necessary permitting for the operation of the heliport.

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<sup>4</sup> Department of Transportation, Aeronautics Division, *Heliport Permits*; “A heliport not open to the general public, access to which is controlled by the owner in support of commercial activities, public service operations and/or personal use.” available at: <https://dot.ca.gov/programs/aeronautics/heliport-permits>

#### IV. **THE PARKING VARIANCE WOULD BE DETRIMENTAL TO THE USE AND ENJOYMENT OF THE SHEEP MOUNTAIN WILDERNESS AND SAN GABRIEL NATIONAL MONUMENT.**

The requested Parking Variance would be detrimental to the use and enjoyment of the East Fork Trail and surrounding wilderness areas as it would continue to strain the already limited parking options. While the applicant has stated that there is sufficient parking available for all members of the public, no evidence has been presented to suggest the available parking can adequately serve *the 177 guests* a day allowed by the Conditions of Approval and all members of the public wishing to access the trail and campground.

Indeed, many of the Bungee America’s patrons park their cars for a significant amount of time as they hike the 10-mile round trip trail and spend hours bungee jumping. Bungee America’s own website states that “[a] day of bungee jumping is a full day adventure.”<sup>5</sup> The Findings establish that the nearby Camp only has 33 available parking spaces, along with additional spots located on the road. (Findings, p. 7.) “Based on the *average number of guests in a single day of 65* and a ratio of one space per three guests, *a minimum of 22 parking spaces would be required.*” (*Id.* at p. 8, emphasis added.) Thus, the Findings establish that on an average day, *two-thirds* of the parking lot is taken up by patrons of the applicant’s business. The excess of parking spots going to patrons of a private, commercial business is a clear detriment to the ability of the general public to access the site. As such, the variance must not be granted without adequate mitigations to reduce the impacts, such as the operation of a shuttle by Bungee America to bring the patrons to and from offsite parking to the trailhead.

#### V. **CONCLUSION**

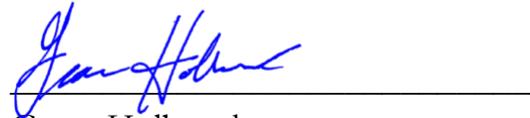
Save the East Fork urges the Commission to deny the CUP and Variance applications, require the Project to undergo full environmental review under CEQA, and obtain all necessary permits from the Department of Transportation Aeronautics Division prior to any rehearing on the matter.

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<sup>5</sup> See Bungee America, *FAQs – How Long Does It Take?*; available at: <https://www.bungeeamerica.com/day-details/faqs>

Save the East Fork welcomes the opportunity to speak with the Commission to discuss any questions surrounding these comments.

Sincerely,



Grace Holbrook

Attorneys for Save the East Fork

Cc:

**From:** [C. M. Heard](#)  
**To:** [Richard Claghorn](#)  
**Cc:** [DRP Public Comment](#)  
**Subject:** County of Los Angeles Regional Planning Commission, Project No. 2018-003069, Conditional Use Permit No. RPPL2018004676 and Variance No. RPPL2018004861, File No. 24-118, Agenda Item No. 9, September 11, 2024  
**Date:** Tuesday, September 10, 2024 8:04:46 PM

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**CAUTION: External Email. Proceed Responsibly.**

Greetings,

I wish to provide comments regarding three aspects of this project.

1. Variance No. RPPL2018004861 to waive the parking requirements

The analysis in the hearing report does not seem to consider that the parking near the East Fork Trailhead and along Camp Bonita Road is present to support for all public uses of the Angeles National Forest. This includes the day use areas along the San Gabriel River; the analysis considers only the use of the East Fork Trail and is therefore utterly inadequate. Furthermore, the comments from Save the East Fork show that two-thirds of the parking lot will be used by customers of Bungee America, Inc. The variance to waive the parking requirements should therefore be DENIED, and Bungee America, Inc. should be required to provide off-site parking and shuttle service for its customers.

2. Unfulfilled requirement for a Forest Service Outfitter/Guide Permit

Notwithstanding statements to the contrary from Attorney Cynthia Morgan-Reed, Bungee America, Inc. is required to have a Forest Service Outfitter/Guide Permit to guide paying customers across the East Fork Trail (Forest Trail #238W13). It is true that owners of inholdings on Forest Service land and their agents, employees, and guests have a right of access to the property without a permit if they use routes open to the public and use modes of travel available to the public. However, Bungee America, Inc. has for years been guiding its paying customers -- who are NOT guests -- along the East Fork Trail. A guiding is required for that activity; see 36 CFR 251.50(d)(1). The CUP should be DENIED unless this deficiency is remedied.

3. Inadequate consideration of impacts on neighboring Wilderness

The analysis in the hearing report notes that there are no neighbors in the vicinity of the Bridge to Nowhere that could be disturbed by the bungee jumping operation there. Incredibly, it entirely fails to consider the effects on the wilderness character of the surrounding Sheep Mountain Wilderness. The CUP should not be approved until that point is analyzed and addressed.

Respectfully submitted,

Charles Michael Heard  
(408) 499-7257  
[heard@pobox.com](mailto:heard@pobox.com)

**From:** [DRP Public Comment](#)  
**To:** [Richard Claghorn](#); [Samuel Dea](#)  
**Cc:** [Elida Luna](#)  
**Subject:** FW: Bungee America and the Bridge to Nowhere  
**Date:** Wednesday, September 11, 2024 7:42:21 AM

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FYI

## RAFAEL ANDRADE

**SENIOR TYPIST-CLERK, Operations & Major Projects (OMP)**

Office: (213) 974-6409 • Direct: (213) 974-6557

Email: [randrade@planning.lacounty.gov](mailto:randrade@planning.lacounty.gov)

---

**From:** ben white <bwootenwhite@hotmail.com>  
**Sent:** Wednesday, September 11, 2024 7:41 AM  
**To:** DRP Public Comment <comment@planning.lacounty.gov>  
**Subject:** Bungee America and the Bridge to Nowhere

**CAUTION: External Email. Proceed Responsibly.**

September 11, 2024

Project 2018-314-3821

Dear Regional Planning Commission,

My name is Ben White and I am chairperson of a group of US Forest Service and San Gabriel Mountains National Monument volunteers called Save the East Fork. I have been a volunteer doing trail work and infrastructure improvements for 35 years. Many of those years I spent working on the trail that leads to the Bridge to Nowhere.

I request that the Regional Planning Commission postpone this hearing until the applicant has produced state permits for the September 11, 2024

special use heliport at the Bridge to Nowhere site. The heliport is currently exempted for personal use, but the applicant has been using the heliport for **commercial** purposes. The site is deep in the Sheep Mountain Wilderness Area, and patrons must walk 3 miles through wilderness area land to reach the bridge.

The recent Bridge Fire highlights the need for additional safety mitigations for the project. The remote location of the project, which is in a high fire severity

zone, emphasizes the need for the applicant to prepare a fire evacuation safety plan.

The proposed CEQA exemptions are improper due to the sensitive ecological areas that surround the project site, namely the Sheep Mountain Wilderness area and the San Gabriel Mountains National Monument.

The parking variance would result in the continued strain on limited public parking options. The variance should be denied. Instead, different mitigation measures should be studied in the EIR.

I believe that I will be impacted by the Environmental Impacts of the project because of the use of the helicopter in the wilderness and the existence of a commercial operation in the middle of a wilderness area. Thank you.

Ben White

978 Norumbega Drive

Monrovia,CA 91016-1821

626-303-1078

[bwootenwhite@hotmail.com](mailto:bwootenwhite@hotmail.com)

**From:** [DRP Public Comment](#)  
**To:** [Richard Claghorn](#); [Samuel Dea](#)  
**Cc:** [Elida Luna](#)  
**Subject:** RE: CUP for Bungee America  
**Date:** Wednesday, September 11, 2024 12:58:11 PM

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FYI

## RAFAEL ANDRADE

### SENIOR TYPIST-CLERK, Operations & Major Projects (OMP)

Office: (213) 974-6409 • Direct: (213) 974-6557

Email: [randrade@planning.lacounty.gov](mailto:randrade@planning.lacounty.gov)

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**From:** Steve Anderson <[sandersonimagery@outlook.com](mailto:sandersonimagery@outlook.com)>  
**Sent:** Wednesday, September 11, 2024 12:35 PM  
**To:** DRP Public Comment <[comment@planning.lacounty.gov](mailto:comment@planning.lacounty.gov)>; Barger, Kathryn <[Kathryn@bos.lacounty.gov](mailto:Kathryn@bos.lacounty.gov)>  
**Subject:** CUP for Bungee America

**CAUTION:** External Email. Proceed Responsibly.

Dear Supervisor Barger and Planning Department,

In August I wrote to Richard Claghorn of the LAC Planning Department concerning why I think the business 'Bungee America' (BA) should not be allowed to operate in the East Fork canyon of the San Gabriel River.

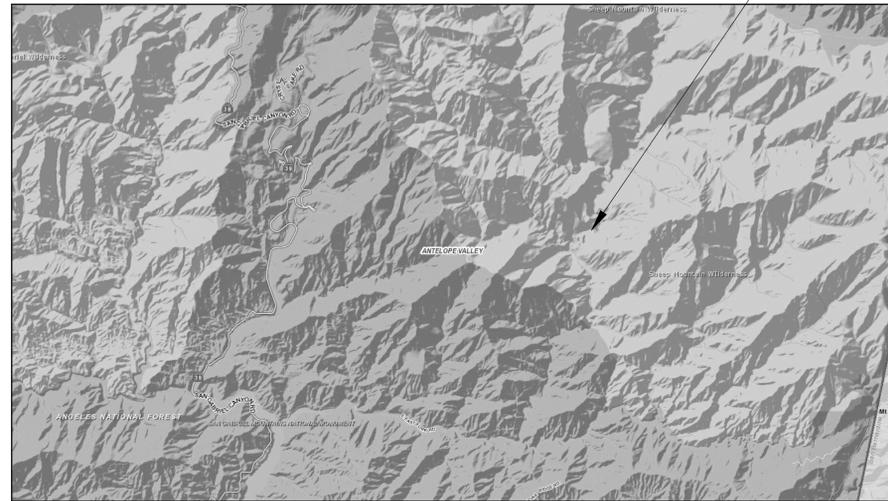
Because of the hearing that is scheduled to determine whether BA can continue to operate, I wanted to reiterate why I think that sort of business has no logical reason to be there. Yes, I understand it is on private land, but it is also within the Sheep Mountain Wilderness. How can the qualities of a Wilderness by definition be maintained if a business draws crowds of people and makes parking and pollution a real headache for those left to clean up the messes?

Also, the currently out of control Bridge Fire is a perfect example of the need for BA to have some kind of evacuation plan for fires and other catastrophes that can occur in the canyon. In addition, I am reminded that the wild life that call the area home, do not appreciate an almost constant

trudge of hikers on weekends on their way to the 'Bridge to Nowhere' to jump off it.

These are just a few of the reasons that I don't think BA should be allowed to operate with any special permit.

Sincerely,  
Steve Anderson  
Fountain Valley

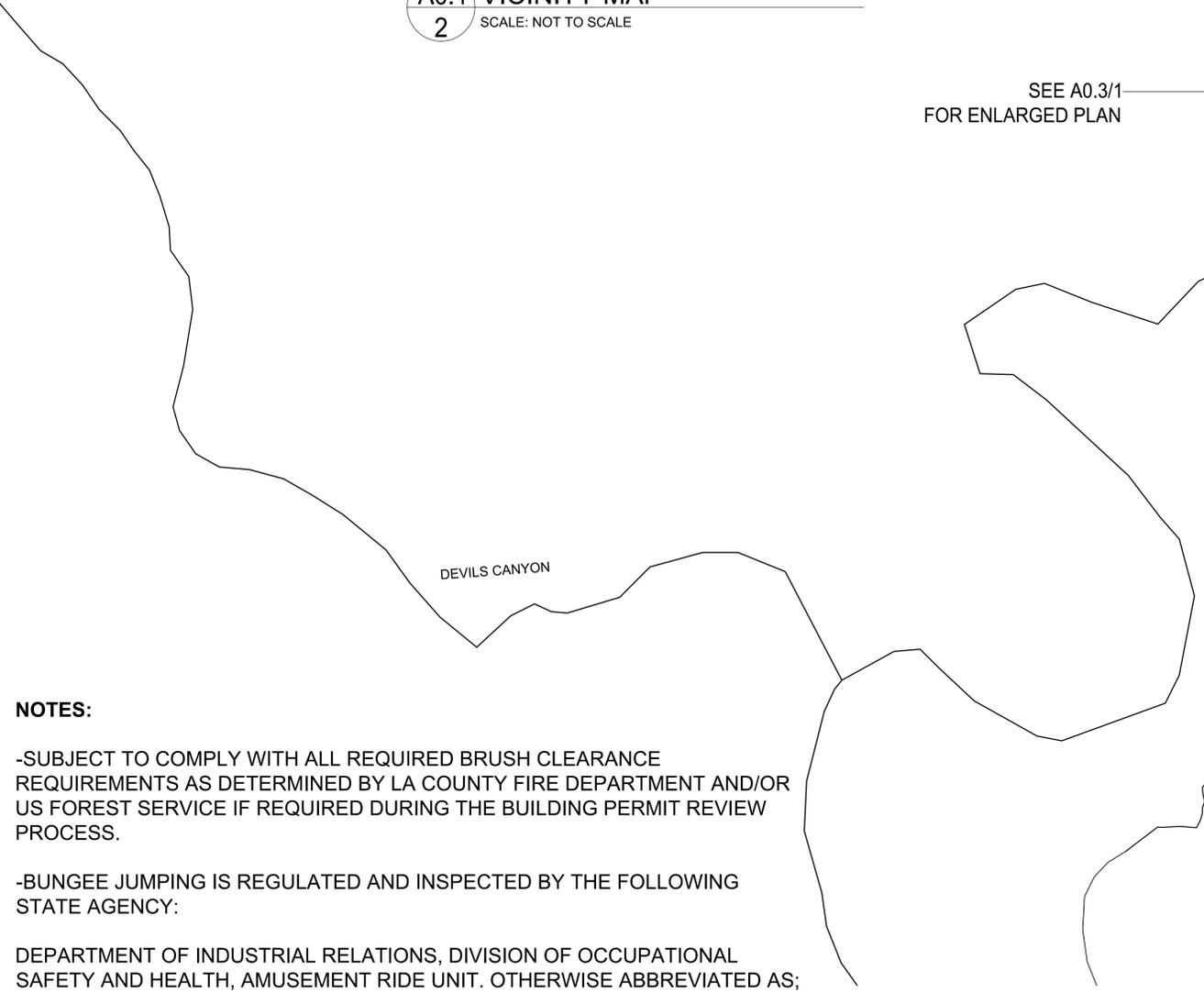


A0.1 VICINITY MAP  
2 SCALE: NOT TO SCALE

HORSESHOE PLACER MINING CLAIMS  
PATENT NO. 342527-T. 2 N., R. 8 W., S.B.M.  
ADAPTATION TO RECORDS WITH METES-AND-BOUNDS  
REMAINING PATENTED LAND - TRACT 37  
ZONING: C-R (COMMERCIAL RECREATION)

SEE A0.3/1  
FOR ENLARGED PLAN

SEE A0.2/1  
FOR ENLARGED PLAN



**NOTES:**

- SUBJECT TO COMPLY WITH ALL REQUIRED BRUSH CLEARANCE REQUIREMENTS AS DETERMINED BY LA COUNTY FIRE DEPARTMENT AND/OR US FOREST SERVICE IF REQUIRED DURING THE BUILDING PERMIT REVIEW PROCESS.
- BUNGEE JUMPING IS REGULATED AND INSPECTED BY THE FOLLOWING STATE AGENCY:  
DEPARTMENT OF INDUSTRIAL RELATIONS, DIVISION OF OCCUPATIONAL SAFETY AND HEALTH, AMUSEMENT RIDE UNIT. OTHERWISE ABBREVIATED AS; DOSH AMUSEMENT RIDE UNIT.
- BUNGEE JUMPING IS REGULATED AND INSPECTED UNDER THE FOLLOWING CALIFORNIA CODE OF REGULATIONS:  
TITLE 8, CCR SECTION 3195.1 - 3195.14.

- ESTIMATED CDFW JURISDICTION
- 1 STORAGE CONTAINER SEE A0.5/3 & A0.6
- 2 STORAGE CONTAINER SEE A0.5/3 & A0.6
- 3 STORAGE CONTAINER SEE A0.5/2 & A0.6
- 4 STORAGE CONTAINER SEE A0.5/2 & A0.6
- 5 CINDER BLOCK BUILDING SEE A0.5/1
- 6 HELICOPTER HANGAR SEE A0.5/4
- 7 BRIDGE TO NOWHERE
- 8 FENCE SEE A0.5/4
- 9 REMOVABLE SUNSHADE CANOPY
- 10 HELICOPTER LANDING ZONE
- 11 SIGN, SEE A0.8
- 12 SECURITY BOOTH W/ FENCE & GATE SEE A0.5/6
- 13 RESTROOM SEE A0.5/7
- 14 CAMPING ZONE

project:  
**HORSESHOE PLACER MINING CLAIMS**

tract: 37  
apn: 8678-002-008, -009, -010 & -011

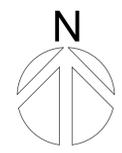
owner:  
saunders mine, llc

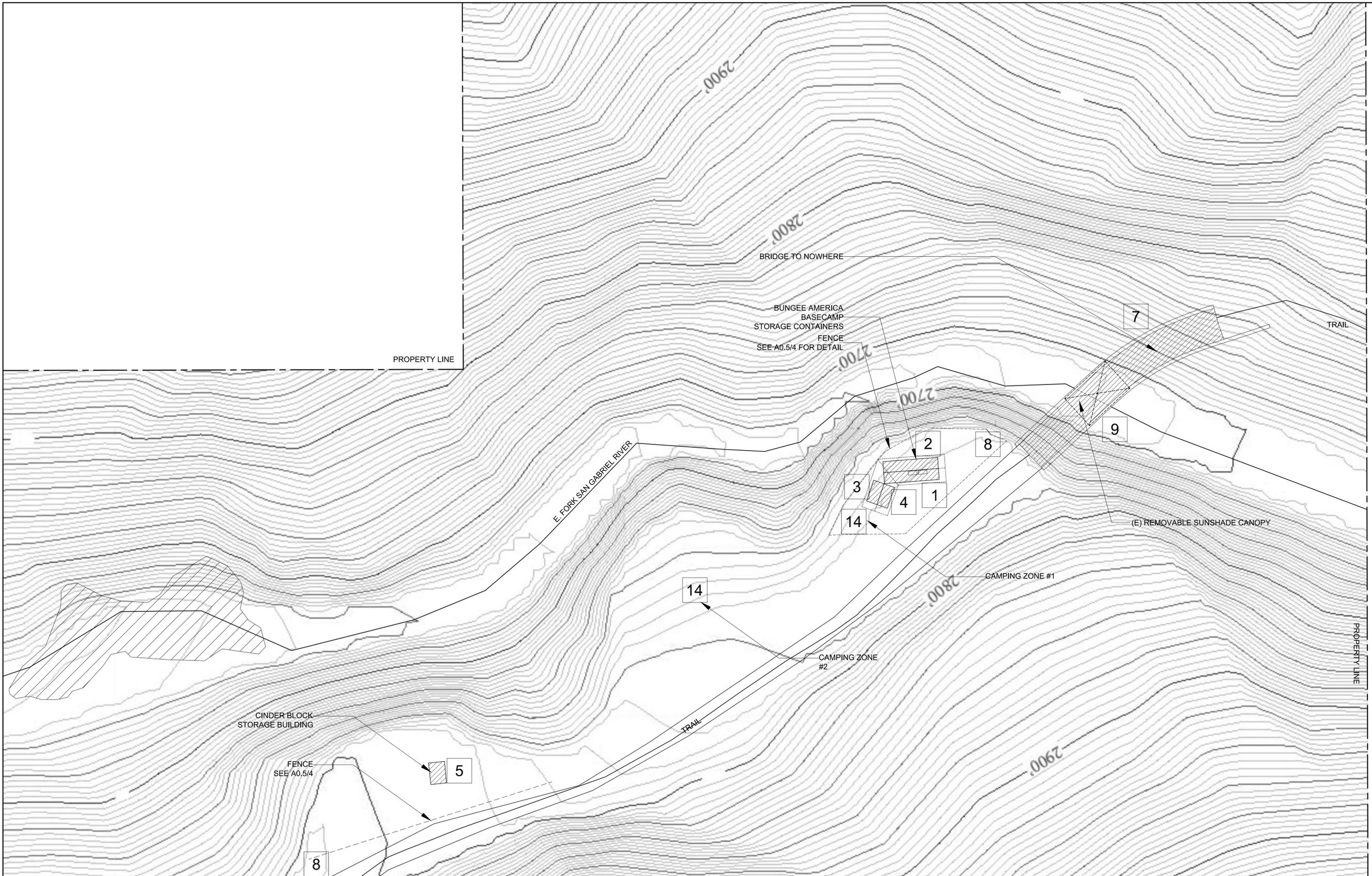
SITEPLAN

SCALE: AS NOTED

01/30/2019  
12/09/2019  
11/01/2023  
08/19/2024

A0.1 SITE PLAN  
1 SCALE: 1/288" = 1'-0"





NOTE: SEE A0.1/1 FOR LOCATION OF ENLARGED SITE PLAN

- ESTIMATED CDFW JURISDICTION
- 1 STORAGE CONTAINER SEE A0.5/3 & A0.6
- 2 STORAGE CONTAINER SEE A0.5/3 & A0.6
- 3 STORAGE CONTAINER SEE A0.5/2 & A0.6
- 4 STORAGE CONTAINER SEE A0.5/2 & A0.6
- 5 CINDER BLOCK BUILDING SEE A0.5/1
- 6 HELICOPTER HANGAR SEE A0.5/4
- 7 BRIDGE TO NOWHERE
- 8 FENCE SEE A0.5/4
- 9 REMOVABLE SUNSHADE CANOPY
- 10 HELICOPTER LANDING ZONE
- 11 SIGN, SEE A0.8
- 12 SECURITY BOOTH W/ FENCE & GATE SEE A0.5/6
- 13 RESTROOM SEE A0.5/7
- 14 CAMPING ZONE

project:  
**HORSESHOE PLACER MINING CLAIMS**  
 tract: 37  
 apn: 8678-002-008, -009, -010 & -011  
 owner:  
 saunders mine, llc

SITEPLAN

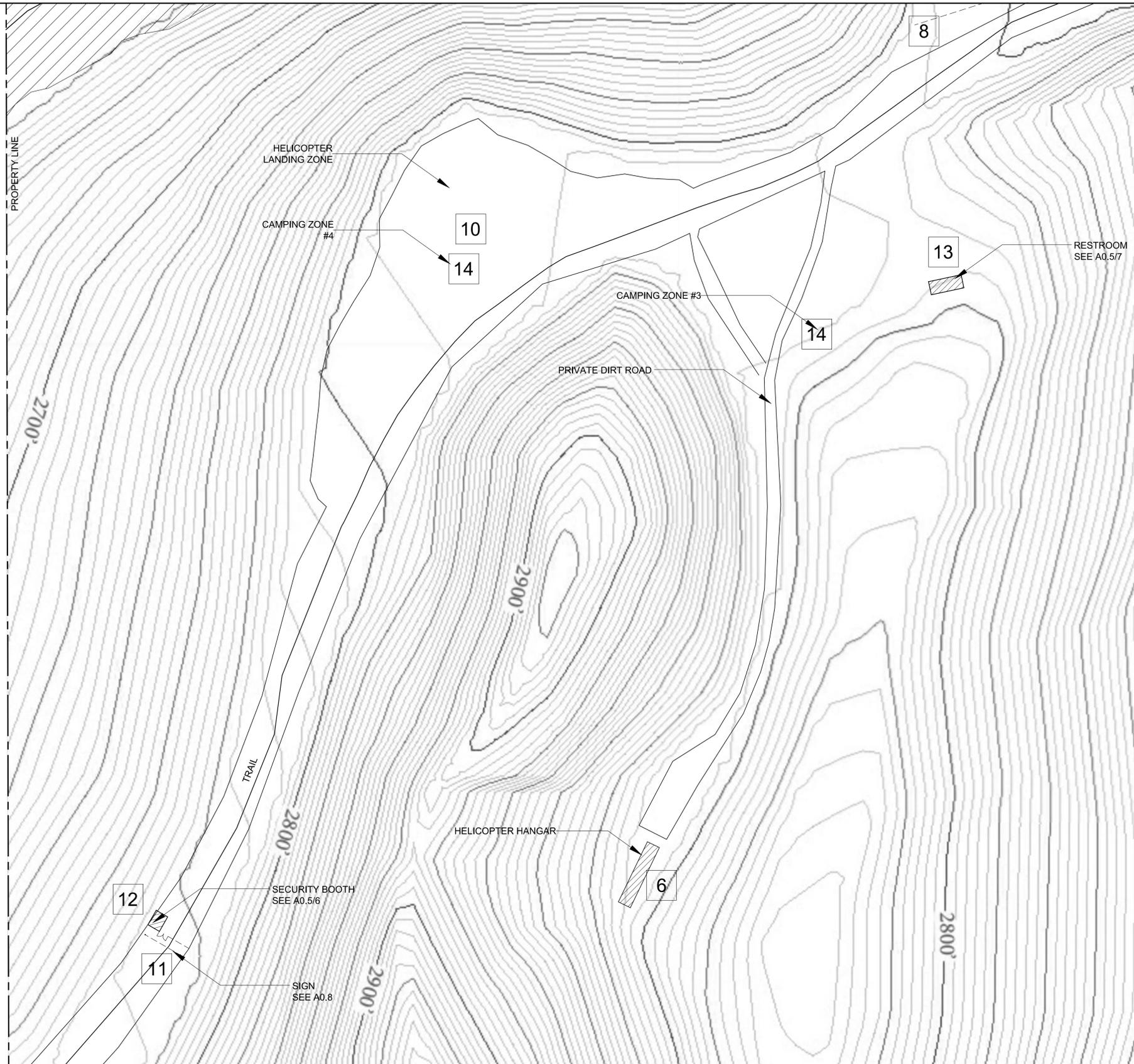
SCALE:  $\frac{1}{32}$ "=1'-0"

01/30/2019  
 12/09/2019  
 11/01/2023  
 08/19/2024

**A0.2**



**A0.2 ENLARGED SITE PLAN**  
 1 SCALE:  $\frac{1}{32}$ "=1'-0"



- ESTIMATED CDFW JURISDICTION
- 1 STORAGE CONTAINER SEE A0.5/3 & A0.6
- 2 STORAGE CONTAINER SEE A0.5/3 & A0.6
- 3 STORAGE CONTAINER SEE A0.5/2 & A0.6
- 4 STORAGE CONTAINER SEE A0.5/2 & A0.6
- 5 CINDER BLOCK BUILDING SEE A0.5/1
- 6 HELICOPTER HANGAR SEE A0.5/4
- 7 BRIDGE TO NOWHERE
- 8 FENCE SEE A0.5/4
- 9 REMOVABLE SUNSHADE CANOPY
- 10 HELICOPTER LANDING ZONE
- 11 SIGN, SEE A0.8
- 12 SECURITY BOOTH W/ FENCE & GATE SEE A0.5/6
- 13 RESTROOM SEE A0.5/7
- 14 CAMPING ZONE

project:  
**HORSESHOE  
 PLACER  
 MINING  
 CLAIMS**

tract: 37  
 apn: 8678-002-008,  
 -009, -010 & -011

owner:  
 saunders mine, llc

**SITEPLAN**

SCALE:  $\frac{1}{32}$ "=1'-0"

11/08/2018  
 11/01/2023  
 08/19/2024

**A0.3**

NOTE: SEE A0.1/1 FOR LOCATION OF ENLARGED SITE PLAN



**A0.3 ENLARGED SITE PLAN**

1 SCALE:  $\frac{1}{32}$ "=1'-0"



- ESTIMATED CDFW JURISDICTION
- 1 STORAGE CONTAINER SEE A0.5/3 & A0.6
- 2 STORAGE CONTAINER SEE A0.5/3 & A0.6
- 3 STORAGE CONTAINER SEE A0.5/2 & A0.6
- 4 STORAGE CONTAINER SEE A0.5/2 & A0.6
- 5 CINDER BLOCK BUILDING SEE A0.5/1
- 6 HELICOPTER HANGAR SEE A0.5/4
- 7 BRIDGE TO NOWHERE
- 8 FENCE SEE A0.5/4
- 9 REMOVABLE SUNSHADE CANOPY
- 10 HELICOPTER LANDING ZONE
- 11 SIGN, SEE A0.8
- 12 SECURITY BOOTH W/ FENCE & GATE SEE A0.5/6
- 13 RESTROOM SEE A0.5/7
- 14 CAMPING ZONE

project:  
**HORSESHOE PLACER MINING CLAIMS**  
 tract: 37  
 apn: 8678-002-008, -009, -010 & -011  
 owner:  
 saunders mine, llc

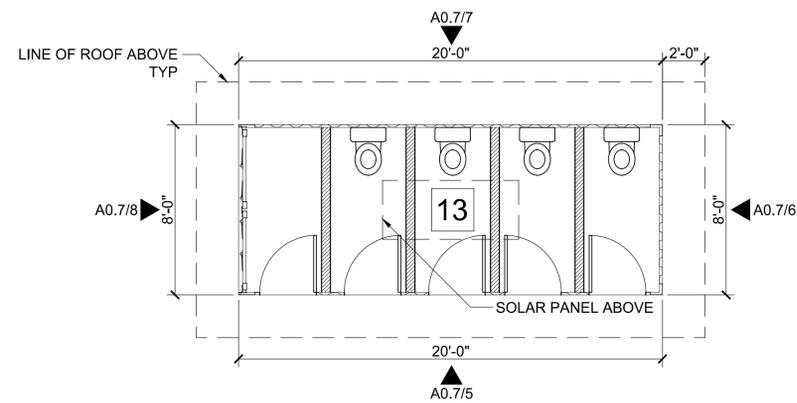
**SITEPLAN**

SCALE: NOT TO SCALE

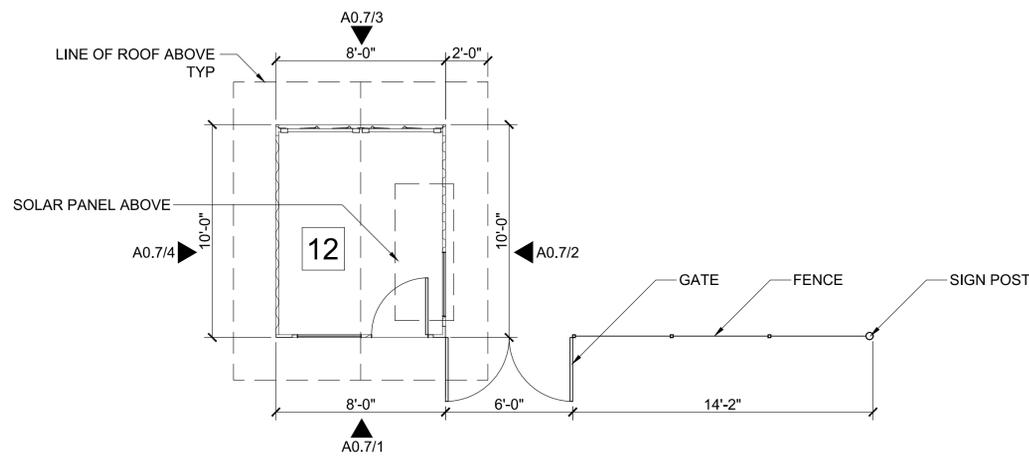
01/30/2019  
 12/09/2019  
 11/01/2023  
 08/19/2024

**A0.4**

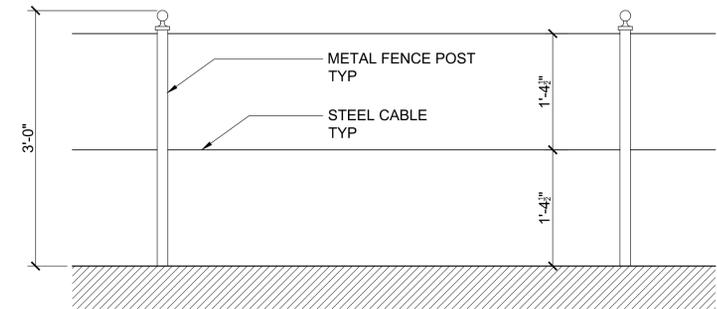
**A0.4 SITE PLAN**  
 1 SCALE: NOT TO SCALE



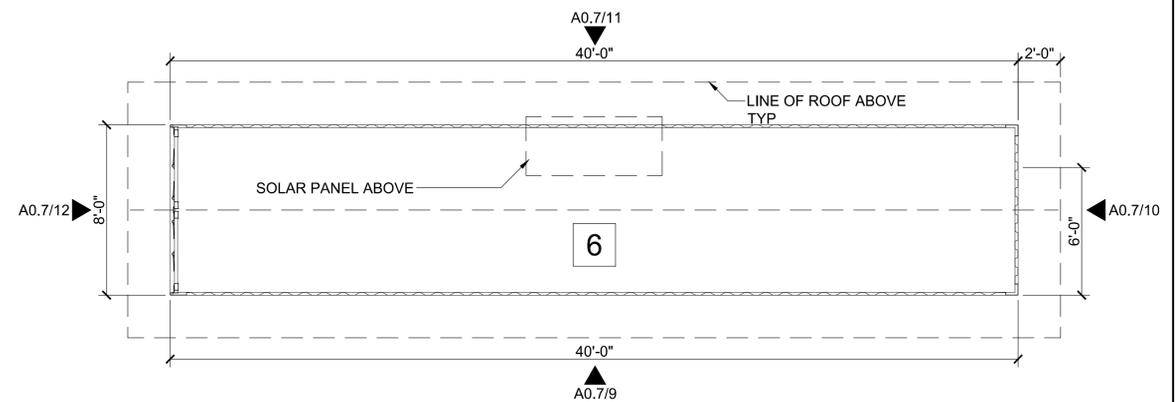
**A0.5 RESTROOM**  
7 SCALE: 1/4"=1'-0"



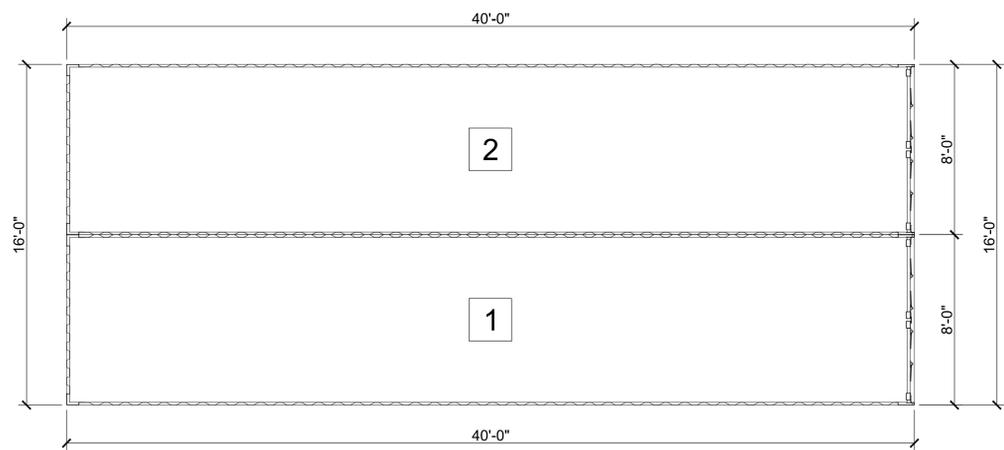
**A0.5 SECURITY BOOTH**  
6 SCALE: 1/4"=1'-0"



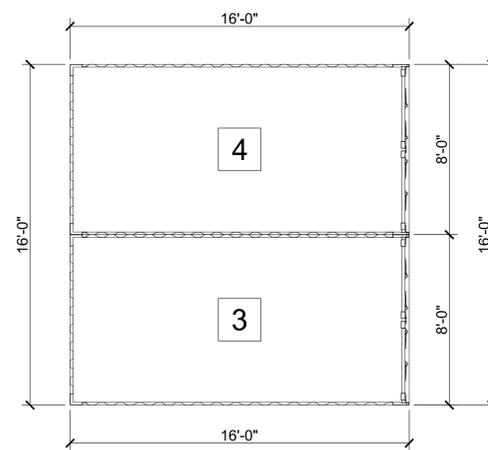
**A0.5 FENCE**  
4 SCALE: 1/4"=1'-0"



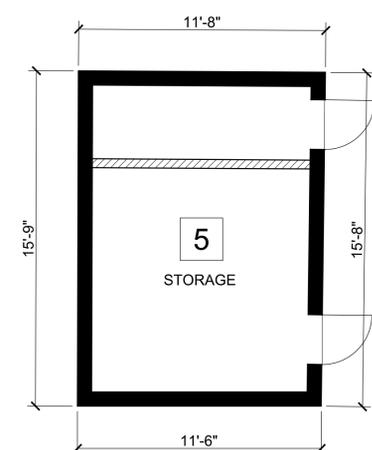
**A0.5 HELICOPTER HANGAR**  
5 SCALE: 1/4"=1'-0"



**A0.5 (E) STORAGE**  
3 SCALE: 1/4"=1'-0"



**A0.5 (E) STORAGE**  
2 SCALE: 1/4"=1'-0"



**A0.5 (E) CINDER BLK. STORAGE BLDG**  
1 SCALE: 1/4"=1'-0"

- 1 STORAGE CONTAINER SEE A0.5/3 & A0.6
- 2 STORAGE CONTAINER SEE A0.5/3 & A0.6
- 3 STORAGE CONTAINER SEE A0.5/2 & A0.6
- 4 STORAGE CONTAINER SEE A0.5/2 & A0.6
- 5 CINDER BLOCK BUILDING SEE A0.5/1
- 6 HELICOPTER HANGAR SEE A0.5/4
- 7 BRIDGE TO NOWHERE
- 8 FENCE SEE A0.5/4
- 9 REMOVABLE SUNSHADE CANOPY
- 10 HELICOPTER LANDING ZONE
- 11 SIGN, SEE A0.8
- 12 SECURITY BOOTH W/ FENCE & GATE SEE A0.5/6
- 13 RESTROOM SEE A0.5/7
- 14 CAMPING ZONE

project:  
**HORSESHOE  
PLACER  
MINING  
CLAIMS**

tract: 37  
apn: 8678-002-008,  
-009, -010 & -011

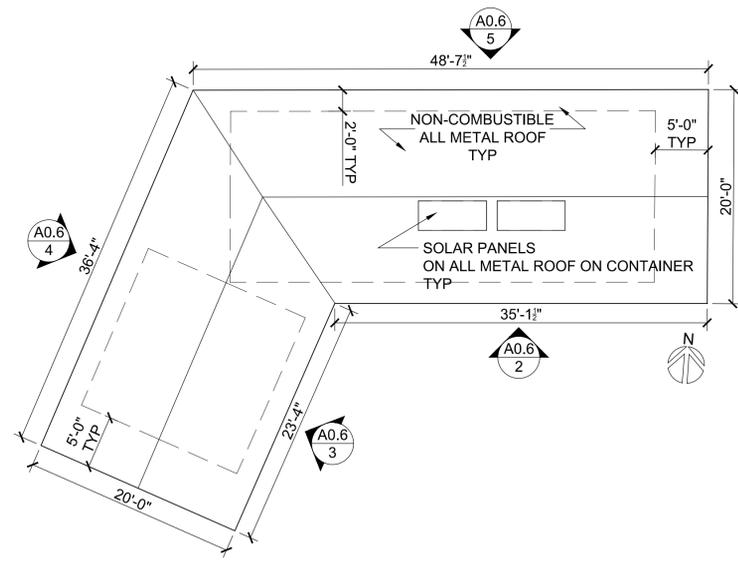
owner:  
saunders mine, llc

**STRUCTURES**

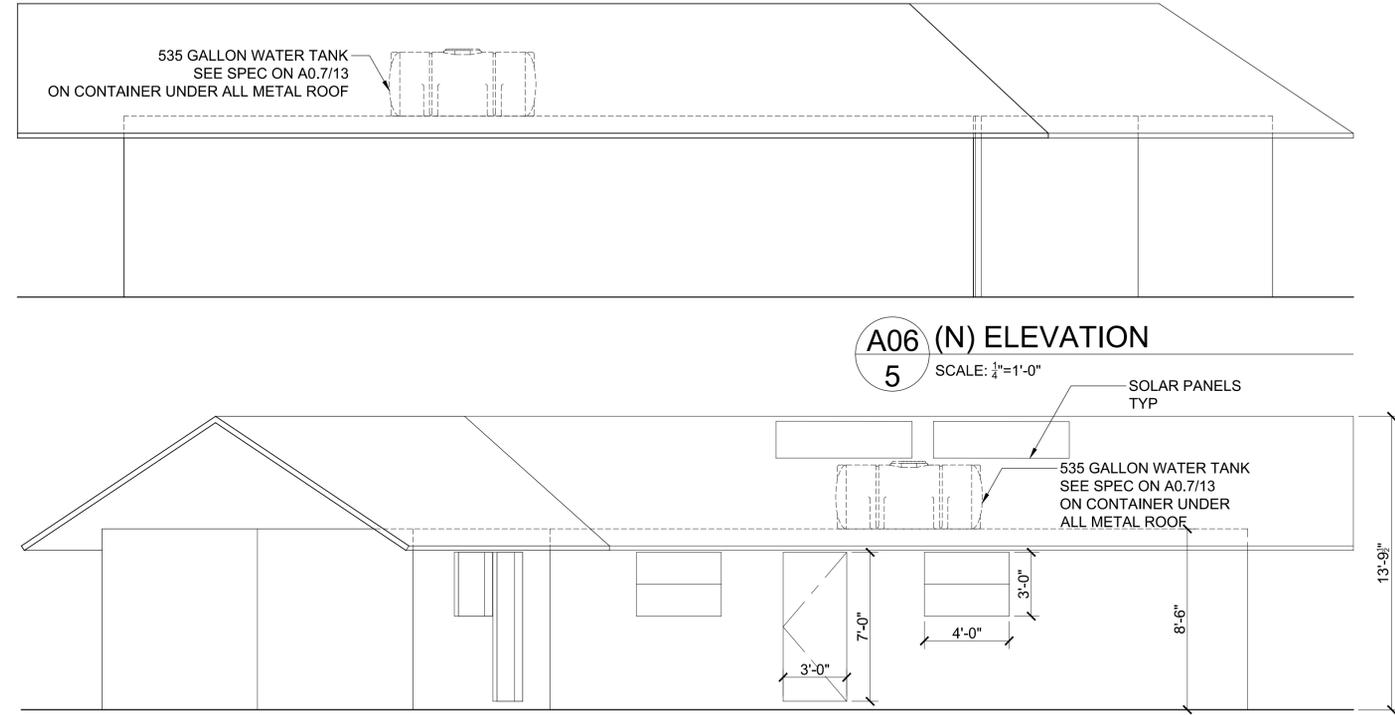
SCALE: 1/4"=1'-0"

11/08/2018  
01/30/2019  
12/09/2019  
11/01/2023

**A0.5**



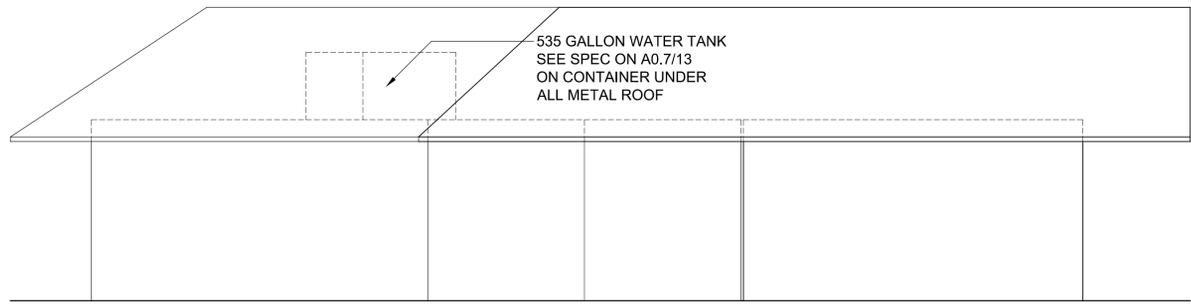
**A0.6 (N) ROOF PLAN**  
6 SCALE: 1/4"=1'-0"



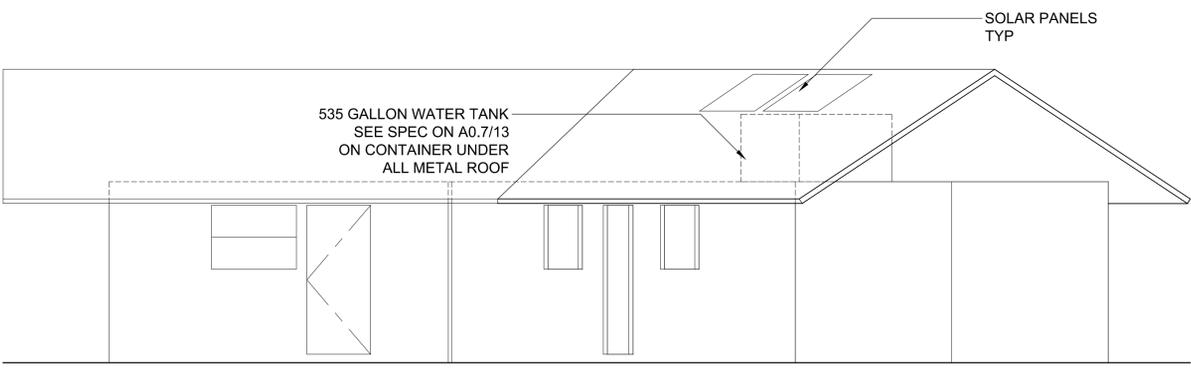
**A0.6 (N) ELEVATION**  
5 SCALE: 1/4"=1'-0"



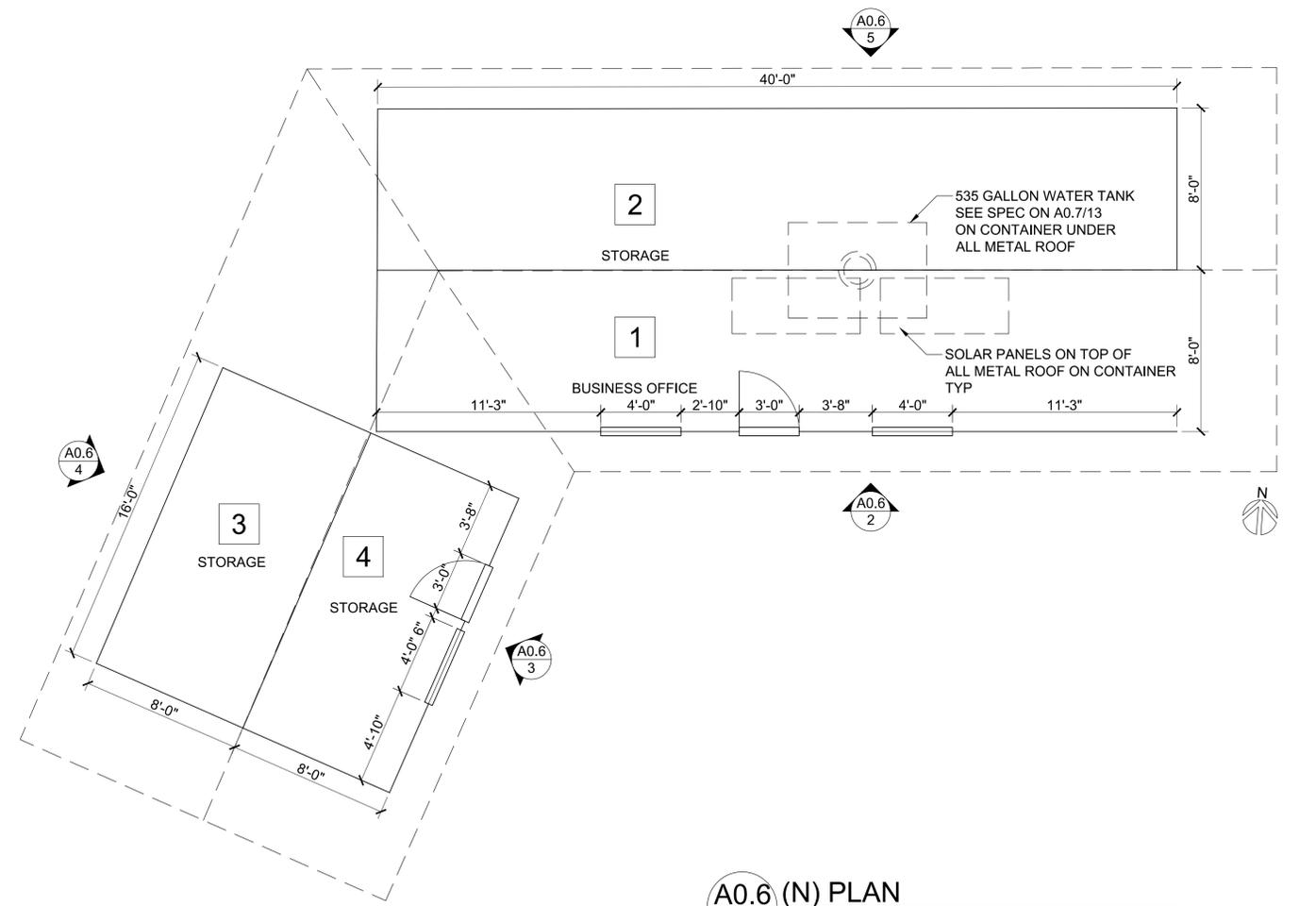
**A0.6 (N) ELEVATION**  
2 SCALE: 1/4"=1'-0"



**A0.6 (N) ELEVATION**  
4 SCALE: 1/4"=1'-0"



**A0.6 (N) ELEVATION**  
3 SCALE: 1/4"=1'-0"



**A0.6 (N) PLAN**  
1 SCALE: 1/4"=1'-0"

- 1 STORAGE CONTAINER SEE A0.5/3 & A0.6
- 2 STORAGE CONTAINER SEE A0.5/3 & A0.6
- 3 STORAGE CONTAINER SEE A0.5/2 & A0.6
- 4 STORAGE CONTAINER SEE A0.5/2 & A0.6
- 5 CINDER BLOCK BUILDING SEE A0.5/1
- 6 HELICOPTER HANGAR SEE A0.5/4
- 7 BRIDGE TO NOWHERE
- 8 FENCE SEE A0.5/4
- 9 REMOVABLE SUNSHADE CANOPY
- 10 HELICOPTER LANDING ZONE
- 11 SIGN, SEE A0.8
- 12 SECURITY BOOTH W/ FENCE & GATE SEE A0.5/6
- 13 RESTROOM SEE A0.5/7
- 14 CAMPING ZONE

project:  
**HORSESHOE PLACER MINING CLAIMS**  
tract: 37  
apn: 8678-002-008, -009, -010 & -011

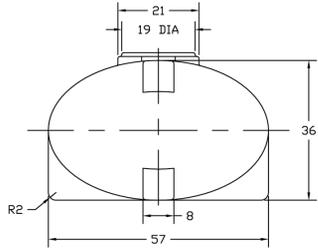
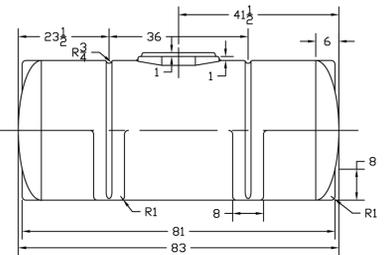
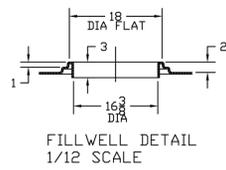
owner:  
saunders mine, llc

**GENERAL STORAGE BUILDINGS**

SCALE: 1/4"=1'-0"

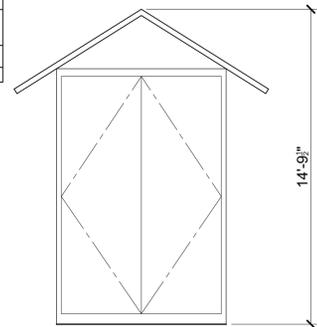
11/08/2018  
01/30/2019  
12/09/2019  
11/01/2023

**A0.6**

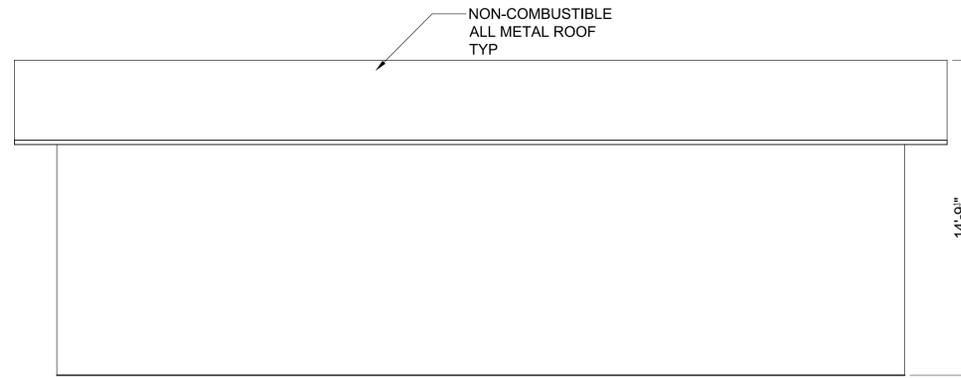


<b>NORWESCO</b>			
ST. BONIFACIUS, MN			
535 GALLON			
ELLIPTICAL LEG TANK			
JTP	23FEB06	SCALE: 1/16	42353
REV			

**A0.7 WATER TANK SPEC**  
13 SCALE: N/A

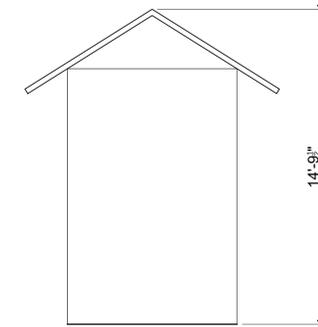


**A0.7 ELEVATION**  
11 SCALE: 1/4"=1'-0"

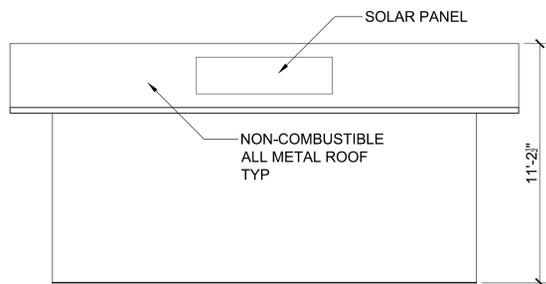


**A0.7 ELEVATION**  
10 SCALE: 1/4"=1'-0"

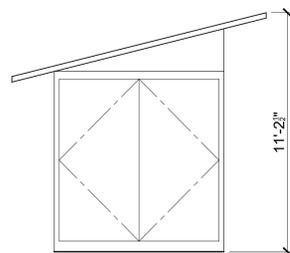
**A0.7 ELEVATION**  
12 SCALE: 1/4"=1'-0"



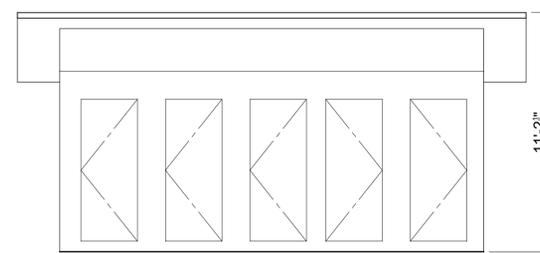
**A0.7 ELEVATION**  
9 SCALE: 1/4"=1'-0"



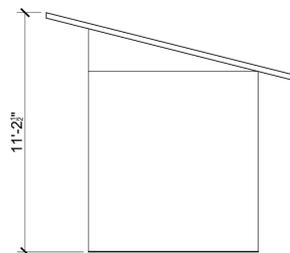
**A0.7 ELEVATION**  
8 SCALE: 1/4"=1'-0"



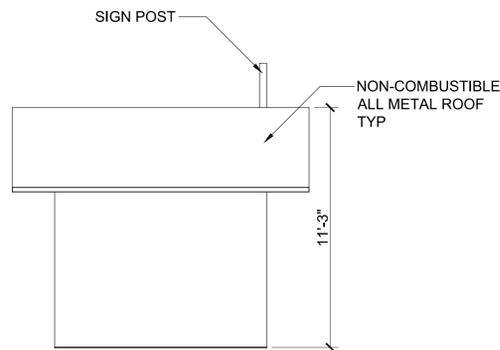
**A0.7 ELEVATION**  
7 SCALE: 1/4"=1'-0"



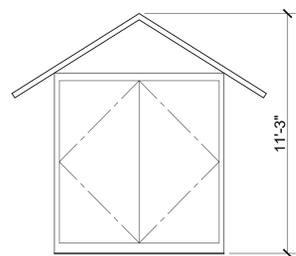
**A0.7 ELEVATION**  
6 SCALE: 1/4"=1'-0"



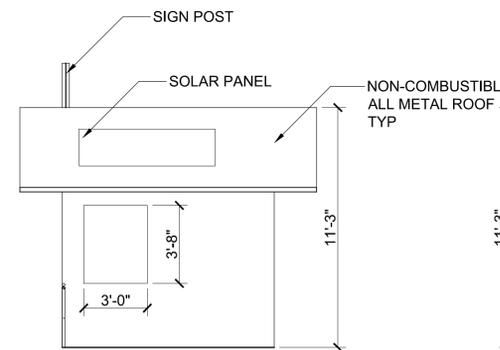
**A0.7 ELEVATION**  
5 SCALE: 1/4"=1'-0"



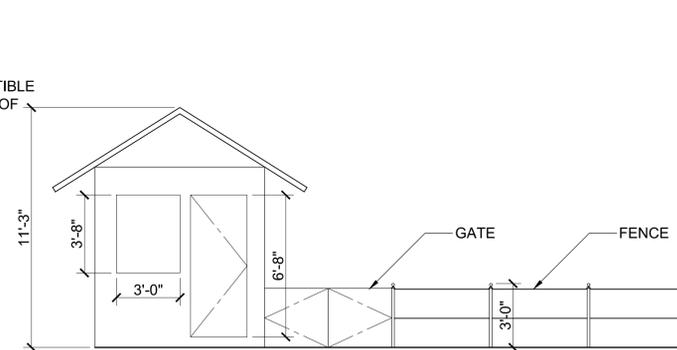
**A0.7 ELEVATION**  
4 SCALE: 1/4"=1'-0"



**A0.7 ELEVATION**  
3 SCALE: 1/4"=1'-0"



**A0.7 ELEVATION**  
2 SCALE: 1/4"=1'-0"



**A0.7 ELEVATION**  
1 SCALE: 1/4"=1'-0"

- 1 STORAGE CONTAINER SEE A0.5/3 & A0.6
- 2 STORAGE CONTAINER SEE A0.5/3 & A0.6
- 3 STORAGE CONTAINER SEE A0.5/2 & A0.6
- 4 STORAGE CONTAINER SEE A0.5/2 & A0.6
- 5 CINDER BLOCK BUILDING SEE A0.5/1
- 6 HELICOPTER HANGAR SEE A0.5/4
- 7 BRIDGE TO NOWHERE
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project:  
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PLACER  
MINING  
CLAIMS**

tract: 37  
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owner:  
saunders mine, llc

ELEVATIONS

SCALE: 1/4"=1'-0"

11/01/2023

**A0.7**

