



County of Los Angeles

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County Counsel

Board of Supervisors

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October 7, 2025

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

Re: Project No. R2014-02690-(3)
(10/29/24 Board Agenda; Item No. 10)

Dear Supervisors:

Your Board previously conducted a duly-noticed public hearing regarding the above-referenced Project No. R2014-02690-(3), consisting of Conditional Use Permit No. 201400127-(3) and Environmental Assessment No. 201400127-(3) to convert an existing single-family residence into a three-room guest ranch with accessory special events on a site with existing vineyards located at 340 Kanan Road (Assessor's Parcel Number 2058-017-025) in the Santa Monica Mountains Planning Area and within the Santa Monica Mountains North Area Community Standards District. At the conclusion of the public hearing, your Board indicated its intent to grant the appeal, deny the applicant's appeal, and deny the project. Enclosed are the findings and order for your Board's consideration.

Very truly yours,

DAWYN R. HARRISON
County Counsel

By

A blue ink signature of Roland Trinh.

ROLAND TRINH
Senior Deputy County Counsel

APPROVED AND RELEASED

A blue ink signature of Thomas J. Faughnan.

THOMAS J. FAUGHNAN
Senior Assistant County Counsel

RT:av
Enclosures

c: Fesia A. Davenport, Chief Executive Officer
Edward Yen, Executive Officer, Board of Supervisors
Amy J. Bodek, Director, Department of Regional Planning

**FINDINGS OF THE BOARD OF SUPERVISORS
AND ORDER
PROJECT NO. R2014-02690-(3)
CONDITIONAL USE PERMIT NO. 201400127-(3)
ENVIRONMENTAL ASSESSMENT NO. 201400127-(3)**

1. The Los Angeles County (County) Board of Supervisors (Board) conducted a duly-noticed public hearing on October 29, 2024, in the matter of Project No. R2014-02690-(3), consisting of Conditional Use Permit No. 201400127-(3) (CUP) and Environmental Assessment No. 201400127-(3) (Project). The County Regional Planning Commission (Commission) previously conducted duly-noticed public hearings on the Project on March 30, 2022, and August 23, 2023.
2. Howard Leight (Applicant) requests the CUP to convert an existing single-family residence (SFR) into a guest ranch with accessory special events on a property located at 340 Kanan Road (Assessor's Parcel Number 2058-017-025) in the Santa Monica Mountains Planning Area within the Santa Monica Mountains North Area Community Standards District (CSD) (hereinafter, the Project Site).
3. The CUP is a request to convert an existing SFR residence into a guest ranch with accessory special events in the A-1-20 (Light Agricultural – 20 Acre Minimum Required Lot Area) Zone and within a designated Significant Ecological Area (SEA), pursuant to Los Angeles County Code (County Code) Sections 22.158.030 and 22.102.080. A guest ranch requires a CUP within the A-1 Zone, pursuant to County Code Section 22.16.030, and development within an SEA also requires a CUP, pursuant to County Code Section 22.102.080.
4. The Project is being evaluated under the policies of the year 2000 Santa Monica Mountains North Area Plan (2000 NAP) because the Project application was deemed complete prior to the adoption of the current Santa Monica Mountains North Area Plan in 2021 (2021 NAP). The Project Site is located within the 2000 NAP's Mountain Lands 20 land use designation.
5. Surrounding zoning within a 500-foot radius of the Project Site includes:

North: A-1-20;
South: A-1-20;
East: Open Space (OS); and
West: A-1-20 and Open Space – Parks (OS-P).
6. Surrounding land uses within a 500-foot radius of the Project Site include:

North: Vacant land;
South: Single-family residence and equestrian facility;
East: Open space; and
West: Single-family residence and Santa Monica Mountains National Recreation Area.

7. The Project Site consists of a 38-acre parcel that was created by Parcel Map No. 3720 in 1975. An SFR was approved by Plot Plan No. 47683 in 2002, and an agricultural accessory building was approved by Plot Plan No. 200400132 in 2004. However, both approvals expired without use. The existing SFR and vineyard were approved by Plot Plan No. 200600006 in 2006.
8. Three separate zoning violations were issued for the unpermitted operation of a helistop and/or a wedding venue at the Project Site in 2011, 2012, and 2018. Each of these violations was subsequently abated after the Project Site was monitored and the unpermitted uses ceased. However, there is an unpermitted graded pad that exists at the Project Site which still needs to be restored.
9. The Project Site is located on a 38-acre steeply sloping lot with grades of more than 50 percent. The summit of the Project Site is developed with a 4,042-square-foot SFR, a swimming pool, a patio, a terrace, and landscaping, all accessed by a winding paved driveway of approximately 1,900 feet in length and 20 feet in width. There are three graded pads along the length of the driveway where new parking areas are proposed as part of the Project. A 1,100-square-foot circular observation pad to the north of the residence, consisting of pavers within a concrete and stone ring, was constructed without permits between 2011 and 2014 and has previously been utilized as an unpermitted helistop.
10. The Project Site contains 6.51 acres of existing grapevines and 1.08 acres of existing orchards of avocado, citrus, and olive trees, as well as walking trails. The remainder of the Project Site consists of rocky outcrops, shrubs, and grasses, some of which have been affected by fuel modification for the existing residence. The Project Site is surrounded by open space to the east and west, SFRs and vacant land to the north, and SFR and equestrian uses to the south. The Project Site is located within a designated SEA, and a mapped significant ridgeline runs from the northwest to the southeast through the site of the existing residence.
11. The Project Site is accessed by Kanan Road, a 100-foot-wide public parkway immediately to the southwest.
12. The Project proposes the conversion of an existing 4,042-square-foot SFR into a guest ranch. The conversion would include adding an approximately 420-square-foot restroom accessible to people with disabilities in compliance with the Americans with Disabilities Act (ADA) to the existing residence. The restroom would be located within an existing equipment room beneath a concrete patio, which is enclosed on all sides and not visible from the exterior. The pavers of the unpermitted observation pad would be removed and replaced with native soil and vegetation. Three parking areas with permeable pavement — 5,634 square feet, 10,924 square feet, and 9,280 square feet, respectively — would be placed at three previously graded locations along the existing 1,900-foot-long, 20-foot-wide driveway. These parking areas would hold a total of 67 off-street parking spaces to accommodate the requested accessory special

events at the Project Site. A new on-site wastewater treatment system is also proposed to the southwest of the existing residence. Finally, an existing three-foot, six-inch-tall glass patio railing would be replaced with five-foot-tall acoustic glass railings. No other changes to the existing structures or additional fuel modification are proposed as part of the Project.

13. In advance of the Project's public hearing, County Department of Regional Planning (Regional Planning) staff (Staff) received four letters and one phone call opposing the Project. Opponents cited concerns related to the increased noise levels and traffic during special events, incompatibility with nearby trails, scenic highways, and cultural resources (such as Ballard Mountain and Santa Monica Mountains National Recreation Area); negative impacts on the local watershed; potential use of rodenticides for the vineyards; and negative impacts on wildlife, especially mountain lions. Opponents also stated that the 100-foot-long southbound left-turn lane for Kanan Road would be insufficient for the Project's intended uses because the speed of traffic at that location would likely result in accidents due to an inability to stop in time. Three letters of support were also received for the Project. Supporters stated that the Applicant has been a responsible property owner and does not have a history of hosting noisy events. In addition, Staff received the following recommendations from County departments:
 - A. County Department of Parks and Recreation: Recommended clearance to public hearing with no conditions in a letter dated April 12, 2018.
 - B. County Fire Department: Recommended clearance to public hearing with no conditions in a letter dated February 8, 2019.
 - C. County Department of Public Health (Public Health): Recommended clearance to public hearing with conditions in a letter dated February 14, 2020.
 - D. County Department of Public Works: Recommended clearance to public hearing with conditions in a letter dated March 3, 2020.
 - E. County SEA Technical Advisory Committee (SEATAC): Recommended clearance to public hearing with conditions at meetings held on September 15, 2020, and January 9, 2023.
14. A duly-noticed public hearing was held before the Commission on March 20, 2022. Staff gave a presentation recommending approval of the Project. Testimony was given both for and against the Project. After a brief discussion, the Commission voted to remove the Project from the hearing calendar to provide the Applicant with time to conduct additional environmental analysis pursuant to the California Environmental Quality Act (Pub. Resources Code, § 21000 et seq.) (CEQA). The Commission also directed the Applicant to

return the Project to SEATAC for further analysis and Staff to address the following issues:

- A. The effect of Project lighting on wildlife, including birds;
 - B. The effect of noise from special events and guest ranch activities on wildlife and neighbors, with a specific emphasis on how far such noise carries from the Project Site;
 - C. The likelihood of mountain lions on the Project Site and the Project's potential impacts on them; and
 - D. Making the ban on rodenticide specifically clear.
15. A second duly-noticed public hearing was held before the Commission on August 23, 2023. Staff gave a brief presentation stating that the issues raised during the March 20, 2022, hearing before the Commission had received further analysis by SEATAC, along with further environmental analysis. Staff again recommended approval of the Project. Testimony was given both for and against the Project. After a brief discussion, the Commission closed the public hearing and approved the Project.
16. The Commission's approval was timely appealed to the Board by the Las Virgenes Homeowners Federation, Inc. (Appellant), on August 31, 2023. Appellant filed the appeal alleging that the Project did not comply with the Santa Monica Mountains Local Coastal Plan; impacts wildlife; and that the CEQA analysis was inadequate and instead a full Environmental Impact Report (EIR) is required for the Project. More specifically, Appellant cited concerns regarding the following issues related to the Project:
- A. The Applicant has a history of illegally operating an event facility and helistop and would be unlikely to follow restrictions imposed in the future;
 - B. The Project does not fit the definition of a guest ranch;
 - C. Renting the location for events should not be considered an accessory use to a guest ranch;
 - D. The Applicant has a web page that continues to advertise the space as a short-term rental and event space and that no permits should be approved until all unpermitted activities have ceased;
 - E. The Project will cater only to elites and has little community value;
 - F. The Project Site is currently for sale and will likely not be operated by the Applicant;

- G. The revised Biological Constraints Analysis and Noise Impact Study reviewed by SEATAC do not adequately address the unique location and elevation of the Project Site;
 - H. The Noise Impact Study only analyzes 200 people in loud conversation and does not address music or amplified sound;
 - I. The Project will have negative lighting and sound impacts on neighbors during outdoor events;
 - J. The difficulty of evacuating the Project Site presents a fire hazard;
 - K. The proposed left-turn lane will not adequately address traffic impacts on Kanan Road;
 - L. The Project was analyzed under the 2000 NAP rather than the 2021 NAP, which has stricter development standards for event spaces and vineyards; and
 - M. The Chumash Native American tribe was not consulted during the CEQA Initial Study process.
17. Applicant also filed an appeal on September 6, 2023, challenging two conditions of approval for the Project related to: (1) the removal of an observation deck; and (2) requirement of acoustic glass around the entire perimeter of the west terrace.
18. A duly-noticed public hearing on the Project was held on October 29, 2024, before the Board. The Director of Regional Planning, Amy Bodek (Director), quickly introduced the Project as one that was approved by the Commission, and that prior comments heard on it related to traffic, the turn lane being in a dangerous location on a curve, ambient noise levels due to its location at the top of a hill, concerns about light spillage, and the use of an unpermitted helistop. The Board then heard testimony and public comments. The Appellant spoke first, emphasizing that the Wallace-Annenberg wildlife bridge is near the Project, with the wildlife migratory path within 1,500 yards, which is a key factor for the creation of the wildlife bridge. Appellant asserts that the environmental analysis for the Project does not mention the wildlife bridge in its documents and believes that the Project warrants an EIR under CEQA. Applicant spoke next, indicating that he has lived in the Santa Monica Mountains for 50 years and, as a long-time resident, has always been sensitive to neighbors as evidenced by immediate neighbors that have submitted letters in support of the Project. Applicant emphasized that the Project has been in the works for over 10 years and that he has worked diligently with the local community; in one case, working with a community association to the point that they did not appeal the approval of the Project even though they had initial objections. Finally, Applicant explained that he also filed his own appeal to challenge two conditions of approval: to keep the observation pad (that was formerly used as a helipad) and lift the requirement of raised glass on the west patio.

19. There were four public comments heard by the Board on the Project. Two were in favor made by: Applicant's acoustic engineer, who testified that all the noise issues have been addressed, including barriers for wildlife; and Applicant's attorney, who asserted that the Annenberg Wildlife crossing is over five miles away from the Project Site, and the migratory path that leads to it is over a mile away. Applicant's attorney added that the Project has been heard by the County SEATAC and Commission twice, and in both instances the wildlife impacts were found not to be significant. One public comment was vague, and the commenter's position was unclear; and the fourth was against the Project by Appellant's Vice President, Roger Pugliese, who reiterated that a thorough EIR for the Project is necessitated.
20. After hearing all testimony and public comments, the Chair of the Board recognized the unique area of the Santa Monica Mountains, recognizing its inherent sensitive habitat and biological diversity, and how the area plan established there contains regulations to better incorporate environmental protections in light of the significant role the Santa Monica Mountains play in the region's ecosystem. The Chair pointed out that the Project Site is within a significant ecological area and a Very High Fire Hazard Severity Zone (VHFHSZ), then stressed the need to protect such lands through reasonable boundaries on land uses given the nature and surroundings of the area. The Chair emphasized concerns regarding fire safety, traffic, noise, lighting, and wildlife movement in relation to frequent large special events in the Santa Monica Mountains where this Project is located. Originally approved as an SFR, the Chair pointed out that in its current state with the illegally constructed helipad, it would not have been approved today under current regulations, and thus rejected the rationale that an intensified use should be authorized because it already exists. The Chair asserted that allowing the SFR to continue to exist as such, with the ability to occasionally apply for temporary special events permits with well-defined mitigation tailored per event, is consistent with what the County originally approved and better safeguards against the unique concerns surrounding the Project Site. As a result, the Board moved to grant Appellant's appeal and deny the Project, thereby also denying the Applicant's appeal and overturning the Commission's approval of the Project.
21. The Board finds the Appellant raises legitimate concerns, including those related to biological resources, noise, and traffic. Because the Project is in a VHFHSZ, the traffic concerns are especially notable if an evacuation is required due to fire or other emergency.
22. The Board finds there has been a history of zoning violations by the Applicant, including on three separate occasions for operating an unpermitted helistop and wedding venue at the Project Site. Because the Commission's approval involved mitigation plans, such as those relating to pledge evacuation, noise reduction, and traffic mitigation, that were conditioned to be prepared at a later date, the Board is not confident the Applicant would operate the Project in a manner

consistent with the required conditions and implement the imposed mitigation measures to conform with applicable standards.

23. The Board finds the Project is not consistent with the goals and policies of the 2000 NAP. The Mountain Lands 20 land use designation is intended for SFR uses, as well as other resource-dependent uses, on large lots. The Project proposes numerous large, outdoor exterior events per year with a capacity of up to 200 persons within a VHFHSZ with limited vehicular access. The frequency and size of these events, along with their intermittent impacts on traffic, is not consistent with single-family uses. The Project will also create additional development within a mapped SEA and will intermittently increase noise, light, sound, and traffic impacts in the area, which may negatively affect the viability of nearby wildlife corridors. The Board finds the Project would not be consistent with the following goals and policies of the 2000 NAP:

A. Conservation and Open Space Element

- i. Policy IV-1: Place primary emphasis on the preservation of large, unbroken blocks of natural open space and wildlife habitat areas, and protect the integrity of habitat linkages. As part of this emphasis, support programs for the purchase of open space lands encourage clustering of development to increase the amount of preserved open space, reduce grading and the need for vegetation clearance, and develop design criteria for the construction of highways and other infrastructure improvements that meet environmentally-sensitive standards similar to those imposed on new development.
- ii. Policy IV-3: Require development designs that protect and preserve significant, viable habitat areas and habitat linkages/wildlife corridors in their natural condition.
- iii. Policy IV-47: Locate recreational facilities of all types in a manner consistent with the environmental values of the land, taking special care to avoid impacts on riparian areas. Regulate the intensity, timing, types, and location of recreational facilities to protect resources and established neighborhoods and rural communities.

B. Safety and Noise Element

- i. Policy V-12: Require that new development within areas subject to wildland fires be designed and sited in a manner which minimizes the threat of loss from wildland fires (located low on slopes or set well back from tops of slopes) while avoiding the need for massive vegetation clearance; such designs should facilitate access by firefighting equipment and provide adequate evacuation routes for residents. Improvements shall be set back from public lands where

possible – particularly where required vegetation clearance may affect the public lands. Massive vegetation clearance should otherwise be avoided where safety is not an issue in order to protect the area's natural environment.

- ii. Policy V-24: Require development projects to demonstrate that no adverse noise effects on adjacent uses will occur from the project and no adverse effects will occur on the project from adjacent influences, if the project is proposed within a 60 dB(A) or greater CNEL noise contour and would create or impact noise sensitive land uses.
- iii. Policy V-25: Use the policies within the Noise Element of the General Plan to determine the compatibility of land use when evaluating proposed new land uses within the jurisdiction of the North Area Plan. That document shall be used as a guide to assist in determining the acceptability of noise for existing or proposed land uses. Where a new land use is proposed to be located adjacent to a use which has a different noise standard, prohibit the new use from creating noise levels in excess of the adjacent use's standard at the property line.
- v. Policy V-26: Prohibit, whenever feasible, new development from increasing ambient noise levels by more than 3 dB(A) within any natural area or sensitive land use.
- vi. Policy V-28: Incorporate the consideration of noise impacts on significant wildlife habitats into the development and environmental review processes.

C. Circulation Element

- i. Policy VII-6: In reviewing projects that generate substantial amounts of "off-peak" traffic, analyze the intrusiveness of project traffic as a land use compatibility issue in addition to the traditional roadway capacity analysis.
- ii. Policy VII-10: Limit the intensity and traffic generation of new residential, commercial, office, and business park development projects to that which is consistent with achieving and maintaining roadway performance objectives and protecting the integrity of existing rural communities and urban/suburban residential neighborhoods.

24. The Board finds the Project is not consistent with the standards identified in the County Noise Ordinance (County Code Title 12). A noise impact study prepared for the Applicant by MD Acoustics concluded that Project sound levels will not exceed 45 dB(A) at any property boundary, but only with certain conditions and

mitigation measures in place. One such condition would require limiting the Project to one outdoor activity per month, with amplified sound ending at 8:00 p.m. and all outside activity ending at 10:00 p.m. A noise monitoring and control plan to be prepared by an acoustic consultant and reviewed by Public Health and Staff at a later date in accordance with County Code Section 22.222.240.B is also contemplated, along with specific shielding of all outdoor noise generating equipment and installation of acoustic glass barriers around the perimeter of the exterior event area. However, this requires careful and responsible compliance by the Applicant; and there is a history of zoning violations by the Applicant that undermines the Board's confidence in proper implementation in order to avoid noise impacts negatively affecting the nearby wildlife corridor and the health, comfort, and welfare of the surrounding community.

25. The Board finds the Project does not meet the required findings for an SEA CUP, specifically those related to maintaining wildlife corridors and preserving the health, peace, comfort, and welfare of the surrounding community.
26. The Board finds the Project is not designed to be highly compatible with nearby biotic resources, as it has not been demonstrated that adequate measures would be taken regarding the management of noise levels, traffic, parking, and impacts to nearby wildlife corridors.
27. The Board finds the Project is not designed so that wildlife movement corridors (migratory paths) are left in an undisturbed and natural state. The Project does not ensure compatibility with wildlife movement, as it has not been demonstrated that adequate measures would be taken regarding the management of noise levels, traffic, and other potential impacts to nearby wildlife corridors.
28. The Board finds the roads and utilities serving the proposed development are not located and designed so as to not conflict with critical resources, habitat areas, or migratory paths. The potential increase in intensity of use of current roads and utilities will not be compatible with critical resources, habitat areas, and migratory paths, as it has not been demonstrated that adequate measures would be taken regarding the management of traffic and its potential impact to nearby habitat and wildlife corridors.
29. The Board finds the Project does not retain sufficient natural vegetative cover and/or open spaces to buffer critical resource areas from the Project's proposed development and uses.
30. The Board finds CEQA does not apply to the Project, pursuant to sections 15061 and 15270 of the State CEQA Guidelines (Title 14, Cal. Code Regs., Chapter 3, §§ 15000-15387), because CEQA does not apply to projects that a public agency rejects or disapproves.

31. The Board finds that, pursuant to County Code Section 22.44.990, the community was properly notified of the public hearing by mail, newspaper (Daily News Los Angeles) on September 28, 2024, and property posting. Additionally, the Project was noticed, and case materials were available on Regional Planning's website. On September 25, 2024, a total of 15 Notices of Public Hearing were mailed to all property owners as identified on the County Assessor's record within a 500-foot radius from the Project Site, as well as 18 notices to those on the courtesy mailing list for The Malibu Zoned District and to any additional interested parties.
32. The location of the documents and other materials constituting the record of proceedings upon which the Board's decision is based in this matter is at the County of Los Angeles Department of Regional 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 Coastal Development Services Section, Department of Regional Planning.

BASED ON THE FOREGOING, THE BOARD OF SUPERVISORS CONCLUDES THAT:

- A. The Board finds the proposed use at the Project Site will adversely affect the health, peace, comfort, or welfare of persons residing or working in the surrounding area; will be materially detrimental to the use, enjoyment, or valuation of property of other persons located in the vicinity of the Project Site; and will jeopardize, endanger, or otherwise constitute a menace to the public health, safety, or general welfare. As proposed, the Project will not comply with all applicable development standards for a guest ranch in the 2000 NAP and the 2000 CSD, specifically those standards related to parking, traffic, noise, and those policies related to resource preservation and emergency access. Noncompliance with these standards adversely affects the health, peace, comfort, and welfare of persons residing or working in the surrounding area.
- B. The Board finds the Project Site is not 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 does not comply with all applicable development standards for a guest ranch in the 2000 NAP and the 2000 CSD, specifically those standards related to parking, traffic, and noise, and those policies related to resource preservation and emergency access. Accordingly, the Project does not adequately integrate with the uses in the surrounding area.
- C. The Board finds the Project Site is not 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 adequacy of streets and parking facilities to serve the Project has not been demonstrated, specifically regarding the potential traffic impacts of

periodic events for up to 200 persons and the Applicant's ability to manage on-site parking facilities.

D. The Project conflicts with the goals and policies of the 2000 NAP.

THEREFORE, THE BOARD OF SUPERVISORS:

1. Finds the Project is exempt from CEQA, pursuant to State CEQA Guidelines sections 15061 and 15270 (projects which are rejected or disapproved);
2. Grants Appellant's appeal of the Project;
3. Denies Applicant's appeal of the Project;
4. Overturns the Regional Planning Commission's approval of the Project; and
5. Denies Project No. R2014-02690-(3) consisting of Conditional Use Permit No. 201400127-(3) and Environmental Assessment No. 201400127-(3).

EXECUTIVE OFFICE – BOARD OF SUPERVISORS

AGENDA ENTRY

DATE OF MEETING	October 7, 2025
DEPARTMENT NAME:	County Counsel
BOARD LETTERHEAD:	County Counsel
SUPERVISORIAL DISTRICT AFFECTED:	THIRD
VOTES REQUIRED:	3
CHIEF INFORMATION OFFICER'S RECOMMENDATION:	<input type="checkbox"/> APPROVE <input type="checkbox"/> APPROVE WITH MODIFICATION <input type="checkbox"/> DISAPPROVE

****** ENTRY MUST BE IN MICROSOFT WORD ******

Instructions: To comply with the Brown Act requirement, the reader should fully understand what the department is asking the Board to approve. The recommendation must describe what the action is for, with whom the action is being taken, fiscal impact, including money amounts, funding sources and effective dates. Also, include an instruction for the Chair(man) or Director to sign when such signature is required on a document.

Recommendation: Adopt findings and order denying Project No. R2014-02690-(3), consisting of Conditional Use Permit No. 201400127-(3) and Environmental Assessment No. 201400127-(3) to convert an existing single-family residence into a guest ranch with accessory special events on a property located at 340 Kanan Road (Assessor's Parcel Number 2058-017-025) in the Santa Monica Mountains Planning Area and within the Santa Monica Mountains North Area Community Standards District. (On October 29, 2024, the Board indicated its intent to grant the appeal, deny the applicant's appeal, and deny the project.) (County Counsel)