



**PUBLIC REQUEST TO ADDRESS
THE BOARD OF SUPERVISORS
COUNTY OF LOS ANGELES, CALIFORNIA**

MEMBERS OF THE BOARD

HILDA L. SOLIS
HOLLY J. MITCHELL
LINDSEY P. HORVATH
JANICE HAHN
KATHRYN BARGER

Correspondence Received

			The following individuals submitted comments on agenda item:	
Agenda #	Relate To	Position	Name	Comments
3.		Favor	Alemnesh Tasfayee	Yes great
			Joan M Slimocosky	support appeal
			Linda Yannetty	Dear Regional Planning Commission and Los Angeles County Supervisors, I am writing as a concerned resident of the Mulholland Highway and Cold Creek area to express my support for the Las Virgenes Homeowners Federation's appeal regarding the proposed four-home development at 24937 Mulholland Highway (Project No. 2019-000010-(3), Minor CDP Nos. RPPL201900016–19). With the hearing set for Tuesday, November 25th, I respectfully ask that this project be reconsidered in light of the significant risk factors and environmental sensitivities within this corridor. Grounds for Concern The parcels for this subdivision were created in 1981 under outdated planning rules. Under today's standards, it is unlikely that more than one or two homes would be permitted on this land. Allowing four large homes based on a 45-year-old framework does not align with current safety, environmental, or zoning expectations. The updated March 24, 2025 Fire Hazard Severity Maps show a 30% increase in acreage designated within the highest severity category. Our entire neighborhood — including the proposed development — is classified as Zone 0, the most extreme fire-risk zone. Having personally evacuated multiple times in recent years, I know how urgent and real this danger is. There also remains considerable uncertainty regarding whether this project meets the CEQA threshold, especially concerning cumulative impacts, wildlife movement, hillside stability, and wildfire response safety. Additionally, the project appears to conflict with the spirit and intent of the Malibu Local Coastal Program, which allows for discretionary reductions in allowable building size when environmental protection and hazard mitigation warrant it. Water use is another significant concern. Larger homes require larger septic systems and greater water consumption, increasing the potential for stress on our watershed and contamination of the water table. These impacts must be given thorough and transparent review. Finally, the approval of this project sets a precedent with long-lasting consequences for all current and future residents. Decisions made in a Zone

As of: 11/25/2025 3:00:09 PM



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0 community must prioritize fire safety, environmental stewardship, and responsible development above all else.

Request

For these reasons, I respectfully urge the County to:

- Uphold the LVHF appeal
- Reevaluate the project with full CEQA compliance
- Exercise discretionary authority to require reduced building sizes
- Prioritize community safety and environmental protection in this highly sensitive corridor

Closing

Thank you for your time and attention to this matter. This development is very close to me and directly north of my property. I have personally experienced multiple wildfire evacuations in recent years. My concern is not about limiting who can live here - it's about making sure that both current and future residents are protected with responsible planning, appropriate building size, and proper environmental review. This is a community I care deeply about, and I want it to be safe and sustainable for everyone who calls it home.

I appreciate your commitment to protecting both the residents and the long-term integrity of the Mulholland/Cold Creek region.

Warm regards,

Linda M Yannetty
2188 Cold Cyn Rd
Calabasas, CA 91302
(310) 913-8401

Melissa Whiting

See attached

Van Whiting

See attached letter

Walter D Miller

Minor Coastal Development Permit Nos.
RPPL201900016,RPPL201900017,RPPL201900018,RPPL201900019

Dear Regional Planning Commission and LA County Supervisors,

I've resided at 2250 Cold Canyon Road for the past 38 years. In the mid-80s, I



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was searching for a large property in the Santa Monica Mountains or North Malibu. After years of searching, I decided to take a break from my home search and called my realtor. Several months later, my good high school friends called me excitedly and informed me that they had found my dream home. Initially, I dismissed their enthusiasm, but they insisted that the property they were considering remodeling by the current owner was exactly what I had been looking for. They also mentioned that the owner was considering selling the property. They described the property as having the acreage I desired, ample yard space for my dogs to run, a sense of seclusion due to the large lots, and being surrounded by miles of canyon roads and State Park land perfect for mountain biking.

I purchased the property next to mine about 20 years ago because I love the sense of open space and the tranquility it offers, away from the hustle and bustle of the city. Growing up in Encino, I found solace in the Santa Monica Mountains. I would ride my bike with my friends and dogs, drive our mini pickups on the dirt Mulholland, and explore the range on mountain bikes.

I still have a deep passion for hiking the incredible trails and cycling the numerous canyons right out my front door. All my neighbors share this passion for the sense of space and beauty that surrounds us in the Cold Creek area. However, I am concerned about the potential impact of this development on our beloved community.

This area is prone to wildfires, and the canyon roads can become congested in the morning and afternoon due to rush-hour traffic and the Calabasas Schools along Mulholland. The Santa Ana winds exacerbate the situation, causing widespread anxiety among residents. I personally experienced the devastating Old Topanga Fire in 1993, which reached Calabasas Peak and ravaged the area all the way to the coast. Since then, there have been numerous fires that have left a lasting impact.

In my backyard, I encounter a diverse range of wildlife, including coyotes, bobcats, red foxes, skunks, raccoons, mountain lions, and now black bears. These mountains and canyons retain their untamed nature, and it would be unfortunate to establish a new precedent by developing subdivisions along the picturesque and delicate Cold Creek watershed and Mulholland corridor.

I kindly request that you seriously consider the consequences of increasing the density of buildings in this designated building zone. Let us preserve this area as a safer, less densely populated place within a sensitive ecosystem and a high-fire zone that requires our attention and protection.

Sincerely,

Walter D. Miller

Homeowner



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Other

Matthew Gelfand

To the Board of Supervisors:
Californians for Homeownership is a 501(c)(3) organization devoted to using legal tools to address California's housing crisis. We are writing regarding Project No. 2019-000010-(3). The County has exceeded the five hearings permitted for this project under Government Code section 65905.5, and as a result, you are legally required to reject the appeal before you. The County's approval of this project is also required by the Housing Accountability Act, Government Code Section 65589.5. For the purposes of Government Code Section 65589.5(k)(2), this letter constitutes our written comments on the project.

The Housing Accountability Act generally requires the County to approve a housing development project unless the project fails to comply with "applicable, objective general plan, zoning, and subdivision standards and criteria, including design review standards, in effect at the time that the application was deemed complete." Gov. Code § 65589.5(j)(1). To count as "objective," a standard must "involve[e] no personal or subjective judgment by a public official and be[] uniformly verifiable by reference to an external and uniform benchmark or criterion available and knowable by both the development applicant or proponent and the public official." Gov. Code § 65589.5(h)(8). In making this determination, the County must approve the project if the evidence "would allow a reasonable person to conclude" that the project met the relevant standard. Gov. Code § 65589.5(f)(4). Projects subject to modified standards pursuant to a density bonus are judged against the County's standards as modified. Gov. Code § 65589.5(j)(3).

The County is subject to strict timing requirements under the Act. If the County desires to find that a project is inconsistent with any of its land use standards, it must issue written findings to that effect within 30 to 60 days after the application to develop the project is determined to be complete. Gov. Code § 65589.5(j)(2)(A). If the County fails to do so, the project is deemed consistent with those standards. Gov. Code § 65589.5(j)(2)(B). If the County determines that a project is consistent with its objective standards, or a project is deemed consistent with such standards, but the County nevertheless proposes to reject it, it must make written findings, supported by a preponderance of the evidence, that the project would have a "specific, adverse impact upon the public health or safety," meaning that the project would have "a significant, quantifiable, direct, and unavoidable impact, based on objective, identified written public health or safety standards, policies, or conditions as they existed on the date the application was deemed complete." Gov. Code § 65589.5(j)(1)(A); see Gov. Code § 65589.5(k)(1)(A)(i)(II). Once again, "objective" means "involving no personal or subjective judgment by a public official and being uniformly verifiable by reference to an external and uniform benchmark or criterion available and knowable by both the development applicant or proponent and the public official." Gov. Code § 65589.5(h)(8).

Even if the County identifies legally sufficient health and safety concerns about a project, it may only reject the project if "[t]here is no feasible method to satisfactorily mitigate or avoid the adverse impact . . . other than the disapproval of the housing development project" Gov. Code § 65589.5(j)(1)(B). Thus, before rejecting a project, the County must consider all



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reasonable measures that could be used to mitigate the impact at issue. These provisions apply to the full range of housing types, including single-family homes, market-rate multifamily projects, and mixed-use developments. Gov. Code § 65589.5(h)(2); see *Honchariw v. Cty. of Stanislaus*, 200 Cal. App. 4th 1066, 1074-76 (2011). And the Legislature has directed that the Act be "interpreted and implemented in a manner to afford the fullest possible weight to the interest of, and the approval and provision of, housing." Gov. Code § 65589.5(a)(2)(L).

When a locality rejects or downsizes a housing development project without complying with the rules described above, the action may be challenged in court in a writ under Code of Civil Procedure Section 1094.5. Gov. Code § 65589.5(m). The legislature has significantly reformed this process over the last few years in an effort to increase compliance. Today, the law provides a private right of action to non-profit organizations like Californians for Homeownership. Gov. Code § 65589.5(k). A non-profit organization can sue without the involvement or approval of the project applicant, to protect the public's interest in the development of new housing. A locality that is sued to enforce Section 65589.5 must prepare the administrative record itself, at its own expense, within 30 days after service of the petition. Gov. Code § 65589.5(m). And if an enforcement lawsuit brought by a non-profit organization is successful, the locality must pay the organization's attorneys' fees. Gov. Code § 65589.5(k)(2). In certain cases, the court will also impose fines that start at \$10,000 per proposed housing unit. Gov. Code § 65589.5(k)(1)(B)(i).

In recent years, there have been a number of successful lawsuits to enforce these rules:

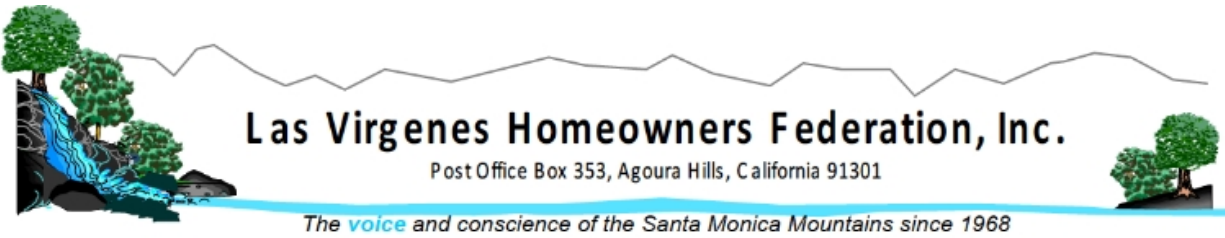
- In *Eden Housing, Inc. v. Town of Los Gatos*, Santa Clara County Superior Court Case No. 16CV300733, the court determined that Los Gatos had improperly denied a subdivision application based on subjective factors. The court found that the factors cited by the town, such as the quality of the site design, the unit mix, and the anticipated cost of the units, were not objective because they did not refer to specific, mandatory criteria to which the applicant could conform.

- *San Francisco Bay Area Renters Federation v. Berkeley City Council*, Alameda County Superior Court Case No. RG16834448, was the final in a series of cases relating to Berkeley's denial of an application to build three single family homes and its pretextual denial of a demolition permit to enable the project. The Court ordered the city to approve the project and to pay \$44,000 in attorneys' fees.

- In *40 Main Street Offices v. City of Los Altos*, Santa Clara County Superior Court Consolidated Case Nos. 19CV349845 & 19CV350422, the court determined that the Los Altos violated the Housing Accountability Act, among other state housing laws, by failing to identify objective land use criteria to justify denying a mixed-use residential and commercial project. The City was ultimately forced to pay approximately \$1 million in delay compensation and attorneys' fees in the case.

- In *Californians for Homeownership v. City of Huntington Beach*, Orange County Superior Court Case No. 30-2019-01107760-CU-WM-CJC, a case brought by our organization, the court ruled that Huntington Beach violated

				the Housing Accountability Act when it rejected a 48-unit condominium project based on vague concerns about health and safety, including traffic concerns similar to those raised by comments on the project you are considering. Following the decision, the City agreed to pay \$600,000 in attorneys' fees to our organization and two other plaintiffs. Based on the above legal framework, state law requires the County to approve this project. We have also considered the County's environmental review for the project and determined that it complied with state law. We urge you to approve the project. Sincerely, Matthew Gelfand
		Item Total	7	
Grand Total			7	



November 22, 2025

Los Angeles County Board of Supervisors
Kenneth Hahn Hall of Administration
500 W. Temple Street, Room 381B
Los Angeles, CA 90012

PROJECT NO. 2019-000010-(3)
MINOR COASTAL DEVELOPMENT PERMIT NO. RPPL2019000016,
RPPL2019000017, RPPL2019000018, RPPL2019000019

Honorable Supervisors:

The Las Virgenes Homeowners Federation appeals the approval of this project as proposed, by the Regional Planning Commission on May 6, 2025. The project proposes to develop 4 lots that maximize the allowable building site, a discretionary maximization that under the Santa Monica Mountains Local Coastal Program should apply only to parcels with NO constraints. Constraints apply to this subdivision.

Under LA County Code Section 22.44.1910.1, the discretionary maximization of the overall footprint of this project as with all development in the area has an impact on coastal resources and the entire community. Maximization is a ceiling not a baseline guarantee, despite a developer's wish. We contend this is a discretionary project.

As stated in our appeal, this project fails in its lack of:

- * Protection of sensitive habitat (i.e. pristine designated Cold Creek Watershed)
- * Avoidance of hazards (e.g. VHFHSZ fire safety issues, especially on Lot 4)

The precedent-setting approval of this 4-lot subdivision in the Santa Monica Mountains, approved 45 years ago, raises many questions about staff claiming conformity with the certified LCP. Was something missed in this our new reality, post the devastating Palisades Fire we endured this past January? Is the LCP even relevant any more as documented by the continuous requests for exemptions brought before the planning department?

The Las Virgenes Homeowners Federation, some 20 associations with thousands of stakeholders in the Santa Monica Mountains, strongly supports the LCP mandate of **resource conservation over development in the coastal zone**. We recall when the County shared this the Federation's vision and we welcome a cooperative relationship again with mandated LCP enforcement.

We respectfully request that you support our appeal. We urge County Planning to go back and confirm this project was adequately evaluated under the LCP, use their discretionary ability to look again at the constraints on this project, minimize the impact on biological resources and avoid the hazardous impact in our Very High Fire Hazard Severity Zone.

Thank you,

Roger Pugliese, co president LVHF

Joan Slimocosky, co president LVHF

November 23, 2025

Re: Public Hearing Project No.2019-000010-(3) Minor Coastal Development Permit Nos. RPPL201900016, RPPL201900017, RPPL201900018, RPPL201900019

Hearing Date: Tuesday, November 25 at 9:30 a.m.

Dear Regional Planning Commission and Los Angeles County Supervisors,

I write in support of the appeal submitted by the Las Virgenes Federation regarding the proposed four-home development at 24937 Mulholland Highway (Parcel Map 10857). I respectfully ask that the proposed project be reevaluated and full consideration be given to current fire-safety realities, environmental protections, and the spirit and intent of the Malibu Local Coastal Program.

The proposed subdivision relies on a 1981 ordinance and related entitlements that do not take into account modern planning standards, current environmental science, and fire-risk data. Under today's standards, it is unlikely that more than one or two homes would be approved on this terrain. Proceeding with four full-scale homes based on outdated rules does not align with contemporary safety obligations that I believe must take precedence.

This area is now mapped in the highest-risk fire designation, Zone 0, under the updated March 24, 2025 Fire Hazard Severity Zones. The Palisades Fire and the Eaton Fire highlight the severe risks of building density and lack of defensible space in high-risk wildland areas like ours. Larger structures, expanded fuel loads, and reduced defensible space, all of which would result from the proposal as it stands, significantly increase the threat to existing homeowners and future residents.

I also have significant environmental questions about the proposed development. In an ecologically sensitive area like ours, protecting wildland habitats and rural character are important. The National Parks Service (<https://home.nps.gov/samo/learn/nature/index.htm>) estimates that the Santa Monica Mountains harbor over 1,000 native plant species and comprise 26 natural communities that support approximately 400 bird species and 35 reptile and amphibian species. This property sits near the UCLA Stunt Ranch Reserve (<https://communitypartnerships.ucla.edu/program/ucla-stunt-ranch-santa-monica-mountains-reserve/>) in an area that UCLA has highlighted as being not only rich in biodiversity and comprising a variety of ecosystems, but where evidence of extensive early human habitation has been recovered. I urge the County to use caution when considering additional density in such a unique and environmentally and archeologically significant area.

This hearing will set precedent. Decisions made here will determine the trajectory of future development across our entire community. I urge the County to exercise its discretion under Code Section 22.44.1910.1 to reduce buildable areas where needed to protect sensitive habitat and minimize hazard exposure. For this parcel, that discretion is not only available but necessary.

As someone who has faced wildfire evacuations with my family, and seen my daughter's school burn in the Palisades Fire, I have experienced firsthand the consequences of dense building in extreme-risk zones. I urge the County to prioritize safety and responsible planning over legacy entitlements and economic pressure.

Thank you for your attention to this matter and for your continued stewardship of our unique and vulnerable region.

Sincerely,

Van Whiting

24875 Mulholland Hwy

Re: Public Hearing Project No.2019-000010-(3) Minor Coastal Development Permit Nos. RPPL201900016, RPPL201900017, RPPL201900018, RPPL201900019
Hearing Date: Tuesday, November 25 at 9:30 a.m.

Dear Regional Planning Commission and Los Angeles County Supervisors,

I am submitting this letter in support of the Las Virgenes Federation's appeal concerning the proposed four-home development at 24937 Mulholland Highway. As a resident and parent in this community, I am deeply concerned that the approved project does not adequately reflect current fire-risk conditions, environmental protections, or responsible land-use planning.

This subdivision was originally configured in 1981. The planning assumptions underlying that map no longer align with modern fire-science, ecological standards, or the County's own more recent policies. Today's updated Fire Hazard Severity Zones—released March 24, 2025—identify our neighborhood as Zone 0, the highest level of danger. Given this, the density, scale, and placement of the proposed homes raise serious safety issues for current and future residents.

Our family has evacuated multiple times in recent years, and each event has underscored how critical defensible space and low structural density are in severe wildfire terrain. During the Palisades Fire, my daughter's school (Seven Arrows Elementary) in the Palisades was burned and many of her friends lost their homes. The proposed development, particularly as currently configured, places additional homes and families in a location where evacuation routes are limited and fuel loads are high and puts both our family and other residents at greater risk. The County's discretion to reduce buildable areas should be exercised here to protect life and property.

This hearing will influence development expectations for our entire rural canyon community. I ask that the County approach it with the highest degree of caution and prioritize safety, environmental integrity, and long-term resilience.

Thank you for considering these concerns and for your continued responsibility in protecting both residents and the natural landscape that makes this region so special.

Sincerely,

Melissa Whiting

24875 Mulholland Hwy



November 24, 2025

VIA EMAIL AND ONLINE SUBMISSION

Board of Supervisors
Los Angeles County
Email: ctalamantes@bos.lacounty.gov

RE: 24937 Mulholland Highway
Agenda Item 3., Project No. 2019-000010-(3)

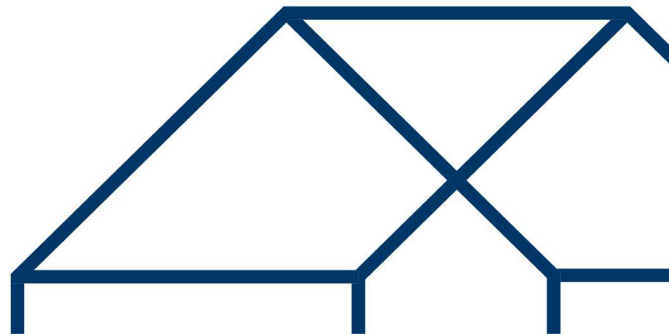
To the Board of Supervisors:

Californians for Homeownership is a 501(c)(3) organization devoted to using legal tools to address California's housing crisis. We are writing regarding Project No. 2019-000010-(3). The County has exceeded the five hearings permitted for this project under Government Code section 65905.5, and as a result, you are legally required to reject the appeal before you. The County's approval of this project is also required by the Housing Accountability Act, Government Code Section 65589.5. For the purposes of Government Code Section 65589.5(k)(2), this letter constitutes our written comments on the project.

The Housing Accountability Act generally requires the County to approve a housing development project unless the project fails to comply with "applicable, objective general plan, zoning, and subdivision standards and criteria, including design review standards, in effect at the time that the application was deemed complete." Gov. Code § 65589.5(j)(1). To count as "objective," a standard must "involve[e] no personal or subjective judgment by a public official and be[] uniformly verifiable by reference to an external and uniform benchmark or criterion available and knowable by both the development applicant or proponent and the public official." Gov. Code § 65589.5(h)(8). In making this determination, the County must approve the project if the evidence "would allow a reasonable person to conclude" that the project met the relevant standard. Gov. Code § 65589.5(f)(4). Projects subject to modified standards pursuant to a density bonus are judged against the County's standards as modified. Gov. Code § 65589.5(j)(3).

The County is subject to strict timing requirements under the Act. If the County desires to find that a project is inconsistent with any of its land use standards, it must issue written findings to that effect within 30 to 60 days after the application to develop the project is determined to be complete. Gov. Code § 65589.5(j)(2)(A). If the County fails to do so, the project is deemed consistent with those standards. Gov. Code § 65589.5(j)(2)(B).

If the County determines that a project is consistent with its objective standards, or a project is deemed consistent with such standards, but the County nevertheless proposes to reject it, it must



make written findings, supported by a preponderance of the evidence, that the project would have a “specific, adverse impact upon the public health or safety,” meaning that the project would have “a significant, quantifiable, direct, and unavoidable impact, based on objective, identified written public health or safety standards, policies, or conditions as they existed on the date the application was deemed complete.” Gov. Code § 65589.5(j)(1)(A); *see* Gov. Code § 65589.5(k)(1)(A)(i)(II). Once again, “objective” means “involving no personal or subjective judgment by a public official and being uniformly verifiable by reference to an external and uniform benchmark or criterion available and knowable by both the development applicant or proponent and the public official.” Gov. Code § 65589.5(h)(8).

Even if the County identifies legally sufficient health and safety concerns about a project, it may only reject the project if “[t]here is no feasible method to satisfactorily mitigate or avoid the adverse impact . . . other than the disapproval of the housing development project” Gov. Code § 65589.5(j)(1)(B). Thus, before rejecting a project, the County must consider all reasonable measures that could be used to mitigate the impact at issue.

These provisions apply to the full range of housing types, including single-family homes, market-rate multifamily projects, and mixed-use developments. Gov. Code § 65589.5(h)(2); *see Honchariw v. Cty. of Stanislaus*, 200 Cal. App. 4th 1066, 1074-76 (2011). And the Legislature has directed that the Act be “interpreted and implemented in a manner to afford the fullest possible weight to the interest of, and the approval and provision of, housing.” Gov. Code § 65589.5(a)(2)(L).

When a locality rejects or downsizes a housing development project without complying with the rules described above, the action may be challenged in court in a writ under Code of Civil Procedure Section 1094.5. Gov. Code § 65589.5(m). The legislature has significantly reformed this process over the last few years in an effort to increase compliance. Today, the law provides a private right of action to non-profit organizations like Californians for Homeownership. Gov. Code § 65589.5(k). A non-profit organization can sue without the involvement or approval of the project applicant, to protect the public’s interest in the development of new housing. A locality that is sued to enforce Section 65589.5 must prepare the administrative record itself, at its own expense, within 30 days after service of the petition. Gov. Code § 65589.5(m). And if an enforcement lawsuit brought by a non-profit organization is successful, the locality must pay the organization’s attorneys’ fees. Gov. Code § 65589.5(k)(2). In certain cases, the court will also impose fines that start at \$10,000 per proposed housing unit. Gov. Code § 65589.5(k)(1)(B)(i).

In recent years, there have been a number of successful lawsuits to enforce these rules:

- In *Eden Housing, Inc. v. Town of Los Gatos*, Santa Clara County Superior Court Case No. 16CV300733, the court determined that Los Gatos had improperly denied a subdivision application based on subjective factors. The court found that the factors cited by the town, such as the quality of the site design, the unit mix, and the anticipated cost of the units, were not objective because they did not refer to specific, mandatory criteria to which the applicant could conform.

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- In *40 Main Street Offices v. City of Los Altos*, Santa Clara County Superior Court Consolidated Case Nos. 19CV349845 & 19CV350422, the court determined that the Los Altos violated the Housing Accountability Act, among other state housing laws, by failing to identify objective land use criteria to justify denying a mixed-use residential and commercial project. The City was ultimately forced to pay approximately \$1 million in delay compensation and attorneys' fees in the case.
- In *Californians for Homeownership v. City of Huntington Beach*, Orange County Superior Court Case No. 30-2019-01107760-CU-WM-CJC, a case brought by our organization, the court ruled that Huntington Beach violated the Housing Accountability Act when it rejected a 48-unit condominium project based on vague concerns about health and safety, including traffic concerns similar to those raised by comments on the project you are considering. Following the decision, the City agreed to pay \$600,000 in attorneys' fees to our organization and two other plaintiffs.

Based on the above legal framework, state law requires the County to approve this project. We have also considered the County's environmental review for the project and determined that it complied with state law. We urge you to approve the project.

Sincerely,



Matthew Gelfand

From: [Walt Miller](#)
To: [PublicHearing](#); [Third District](#)
Subject: Public Hearing Project No.2019-000010-(3)
Date: Tuesday, November 18, 2025 9:40:05 AM

Minor Coastal Development Permit Nos.
RPPL201900016,RPPL201900017,RPPL201900018,RPPL201900019

Dear Regional Planning Commission and LA County Supervisors,

I've resided at 2250 Cold Canyon Road for the past 38 years. In the mid-80s, I was searching for a large property in the Santa Monica Mountains or North Malibu. After years of searching, I decided to take a break from my home search and called my realtor. Several months later, my good high school friends called me excitedly and informed me that they had found my dream home. Initially, I dismissed their enthusiasm, but they insisted that the property they were considering remodeling by the current owner was exactly what I had been looking for. They also mentioned that the owner was considering selling the property. They described the property as having the acreage I desired, ample yard space for my dogs to run, a sense of seclusion due to the large lots, and being surrounded by miles of canyon roads and State Park land perfect for mountain biking.

I purchased the property next to mine about 20 years ago because I love the sense of open space and the tranquility it offers, away from the hustle and bustle of the city. Growing up in Encino, I found solace in the Santa Monica Mountains. I would ride my bike with my friends and dogs, drive our mini pickups on the dirt Mulholland, and explore the range on mountain bikes.

I still have a deep passion for hiking the incredible trails and cycling the numerous canyons right out my front door. All my neighbors share this passion for the sense of space and beauty that surrounds us in the Cold Creek area. However, I am concerned about the potential impact of this development on our beloved community.

This area is prone to wildfires, and the canyon roads can become congested in the morning and afternoon due to rush-hour traffic and the Calabasas Schools along Mulholland. The Santa Ana winds exacerbate the situation, causing widespread anxiety among residents. I personally experienced the devastating Old Topanga Fire in 1993, which reached Calabasas Peak and ravaged the area all the way to the coast. Since then, there have been numerous fires that have left a lasting impact.

In my backyard, I encounter a diverse range of wildlife, including coyotes, bobcats, red foxes, skunks, raccoons, mountain lions, and now black bears. These mountains and canyons retain their untamed nature, and it would be unfortunate to establish a new precedent by developing subdivisions along the picturesque and delicate Cold Creek watershed and Mulholland corridor.

I kindly request that you seriously consider the consequences of increasing the density of buildings in this designated building zone. Let us preserve this area as a safer, less densely populated place within a sensitive ecosystem and a high-fire zone that requires our attention and protection.

Sincerely,

Walter D. Miller

Homeowner

From: [Jennifer Mayer](#)
To: [PublicHearing](#); [Third District](#)
Subject: Public hearing Project No.2019-000010-(3) Minor Coastal Development Permit Nos. RPPL201900016, RPPL201900017, RPPL201900018, RPPL201900019
Date: Thursday, November 20, 2025 12:11:13 PM

To Whom It May Concern:

I am writing to support the appeal by The Las Virgenes Homeowners Federation regarding the 4 home proposal at the site of 24937 Mulholland Hwy. The support the Las Virgenes Federation reason for Appeal as follows:

LA County Code Section 22.44.1910.1 : with discretionary maximization in mind, County can require a smaller building site area to meet provisions of LIP, including:

- a. Protection of sensitive habitat (i.e. pristine designated cold creek watershed) and
- b. Avoidance of hazards (e.g. fire safety issues, especially on Lot 4)

In addition, I join the Las Virgenes Homeowners Federation concerns as follows:

- a. The original parceling of this Subdivision was in 1981 - with today's current planning rules most likely 1 maximum 2 homes would be granted. The developer therefore is working through an old outdated 45 year old ordinance.
- b. The Palisades Fire should have changed County Supervisors assessment on the density and size of buildings permitted on any lot in this rural subdivision.
- c. On March 24, 2025 the latest fire hazard severity maps for Los Angeles County, which include areas under both state and local responsibility, were released. The updated map shows an increase in the number of acres designated as fire hazard zones in Los Angeles County including a 30% increase in the highest severity category. All of our neighborhood homes and properties and the proposed new development are in the highest severity zone: Zone 0.
- d. We continue to express concern about this project meeting the California Environmental Quality Act threshold.
- e. We hold a view that the development contravenes the Malibu Local Coastal Program guidelines and spirit. The County has at its discretion the ability to reduce the building size for one, some or all four of these homes
- f. Water use and conservation. Bigger homes mean more water usage - larger septic tanks - more potential of water table contamination.
- g. ***Importantly this hearing will set precedence for ALL current and ALL future residents/developments in our area!*** We will not allow our severe fire zone location to become a Palisades like risk.

With anticipation for your careful consideration,

Jen Mayer
2222 Cold Canyon Road, Calabasas, CA

--

Jen Mayer
(323) 828-3860

Liam Lynch
24879 Mulholland Highway
Calabasas, CA 91302

November 18, 2025

For Attention Of:

Los Angeles County, Executive Office of the Board of Supervisors
Board Services Division
Kenneth Hahn Hall of Administration
500 West Temple Street, Room 383
Los Angeles, CA 90012

Dear County Supervisors-

I am writing to you today as an interested party, and immediately effected neighbor of the above proposed development and in representation of our Mulholland scenic corridor to support the appeal by The Las Virgenes Homeowners Federation on all of our behalf in this community against the dense 4 home proposal at the site of 24937 Mulholland Hwy.

I am sure you have or will receive a staff briefing on this proposal, which has galvanized a community in their objection to the extent and building size areas for all four homes. In particular my family is deeply concerned about Lot 4 where the largest of the homes is proposed at over 4300 square foot structure and immediately adjacent to our fenceline and less than 60 feet from our home, in an area that is allocated as Zone 0 on the fire map, and where it is recommended that structures should not be closer than 100 feet. Hence this proposed development is creating grave concern around fire danger and neighborhood safety.

Following instructions from the lead planner in July 2024 to reduce the size of then LOTS 3 & 4 - a decision was made by the county to accept a reduction in the building area for LOT 3 - while perplexingly maintaining the same maximum foot print for LOT 4 - which is the closest to the immediately adjacent 2 neighboring properties(one of them our home) - and as I already explained a mere 60 feet from the current Existing Neighboring Home and only 10 feet from our property line fence.

We understand the developer decided to reduce the building size of LOT 3 for wildlife mitigation and Fire safety reasons. We would ask why this same principal was not applied to LOT 4 with respect to defensible space from even closer already existing properties and why would the County not insist that this would also be reduced in size and footprint. Admittedly this decision was made before our most recent worst fires in LA County history however the 100 foot recommendation was already in place. This is why we support the Federations appeal and are appealing to you to do the same.

Grounds For Our Objections

The Las Virgenes Federation reason for appeal is as follows:

LA County Code Section 22.44.1910.1: with discretionary maximization in mind, County can require a smaller building site area to meet provisions of LCP, including:

- a. Protection of sensitive habitat (i.e. pristine designated cold creek watershed) and
- b. Avoidance of hazards (e.g. fire safety issues, especially on Lot 4)

But there are many more reasons of course that we as a community are wary of this development. Here are some points:

- a. The original parceling of this Subdivision was in 1981 - with today's current planning rules most likely 1 maximum 2 homes would be granted. The developer therefore is working through an old outdated 45-year-old ordinance.
- b. The Palisades Fire has changed County Supervisors assessment on the density and size of buildings permitted on any lot in this rural subdivision. I have so appreciated Supervisor Horvath's views expressed in this area with the launch **Blue Ribbon Commission on Climate Action and Fire-Safe Recovery** and your public comment on the new world we all now are living in
- c. On March 24, 2025 the latest fire hazard severity maps for Los Angeles County, which include areas under both state and local responsibility, were released. The updated map shows an increase in the number of acres designated as fire hazard zones in Los Angeles County including a 30% increase in the highest severity category. All of our neighborhood homes and properties and the proposed new development are in the highest severity zone: Zone 0.
- d. We continue to express concern about this project meeting the California Environmental Quality Act threshold.
- e. We hold a view that the development may contravene the Malibu Local Coastal Program guidelines and spirit. The County has at its discretion the ability to reduce the building size for one, some or all four of these homes
- f. Water use and conservation. Bigger homes mean more water usage - larger septic tanks - more potential of water table contamination in the pristine cold creek watershed.
- g. Importantly this hearing will set precedence for ALL current and ALL future residents/developments in our area! We will not allow our severe fire zone location to become a Palisades like risk.

In Summary

We are asking for your support of the appeal as our esteemed County Supervisors in the protected Santa Monica Mountains corridor to use the County's discretion to reduce the home size and building size to mitigate against our enduring health and safety concerns. We encourage you to request a legitimate environmental impact study and to enforcing state law for optimizing defensible space and mitigating fire risk for current and all prospective new homeowners in our region. As a family that has now evacuated our home 4 times in the last 7 years and packed bags ready to go innumerable others, we cannot in good conscience not petition and plea to you our local Supervisor and fellow County Supervisors to please not permit a situation where people and property are put into real and explicit harm.

I am truly grateful for the attention you may give it and know the community is grateful too.

Sincerely

Liam Lynch

November 14, 2025

TO: Regional Planning Commission and LA County Supervisors
FROM: Michael & Christy Blodgett - 24885 Mulholland Hwy, Calabasas

We are submitting our appeal to the July 23rd Regional Planning Commission approval for Project Number 2019-00010 - especially LOT 4 (MINOR CDP NO. RPPL2019000019) . We hope you reconsider the approved project as it does not meet the CEQA threshold. As direct neighbors to the development, maintain grave concern that following instructions from the lead planner in July 2024 to reduce the size of then . LOTS 3 & 4 - a decision was made by the county to accept a reduction in the building area for LOT 3 - while maintaining the same maximum foot print for LOT 4 - immediately adjacent to our property and Lynch neighboring property. The small distance of **ONLY 50 feet** from our home and only **10 feet** from the Lynch property line fence. We realize the developer made a decision to reduce the building size of LOT 3 for wild life mitigation and fire safety reasons. We would expect this same guideline to be applied to LOT 4 with respect to defensible fire space from even closer already existing properties. The site developer and the county are placing current and potential future residents in extreme danger of imminent fire risk. This area has been allocated in the highest danger fire zone, ZONE 0, when the new maps were released on March 24th 2025. We are asking the County Board of Supervisors apply common sense to the planning approval and reconsider the July 23rd decision. As elected representatives of all the people in our district, please advocate for responsible and safe development - not development motivated by economics or profit alone. We submit this appeal with due respect to LA County Planning and to the developer.

Respectfully,


Michael & Christy Blodgett - 24885 Mulholland Hwy

NON-APPLICANT

Date 8/4/2025

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.: 2019-000010-(3)

APPLICANT: Las Virgenes Homeowners Fed., Inc.

LOCATION: 24937 Mulholland Hwy

Minor CDP(s) RPPL 2019000016, RPPL 2019000017, RPPL 2019000018,
RPPL 2019000019 EA # RPPL 2023 001199 Zoned Santa Monica
APN(s) 4455-019-044, 045, 046, 047 District: Coastal

Related zoning matters:

CUP(s) or VARIANCE No. _____

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: \$1,181*

☒ The Approval of this request: \$1,181* N/A SMMS Coastal Zone

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

Briefly, explain the reason for the appeal (attach additional information if necessary):

LA County ^{Code} Section 22.44.1910.1 With discretionary maximization in mind, County can require a smaller Building Site Area to meet provisions of LIP, including:

- 1) protection of sensitive habitat (i.e. pristine designated Cold Creek Watershed)
- and 2) avoidance of hazards (e.g. fire safety issues, especially on Lot 4 -WHF52)

Joan Slimocosky co-president LVHF
Roger Pugliese ROG co-president LVHF
(Signed) Appellant

Joan Slimocosky Roger Pugliese
Print Name

P.O. Box 353

Street Address

Agoura Hills, CA 91301

City/Zip

(818) 274-1638 (310) 455-2951

Day Time Telephone Number

jslimocosky@gmail.com emimoon@gmail.com
E-mail Address

From: [Linda Yannetty](#)
To: [PublicHearing](#); [Third District](#)
Subject: Support for LVHF Appeal – Project No. 2019-000010-(3), 24937 Mulholland Hwy
Date: Wednesday, November 19, 2025 9:05:56 PM

Dear Regional Planning Commission and Los Angeles County Supervisors,

I am writing as a concerned resident of the Mulholland Highway and Cold Creek area to express my support for the Las Virgenes Homeowners Federation's appeal regarding the proposed four-home development at 24937 Mulholland Highway (Project No. 2019-000010-(3), Minor CDP Nos. RPPL201900016–19). With the hearing set for Tuesday, November 25th, I respectfully ask that this project be reconsidered in light of the significant risk factors and environmental sensitivities within this corridor.

Grounds for Concern

The parcels for this subdivision were created in 1981 under outdated planning rules. Under today's standards, it is unlikely that more than one or two homes would be permitted on this land. Allowing four large homes based on a 45-year-old framework does not align with current safety, environmental, or zoning expectations.

The updated March 24, 2025 Fire Hazard Severity Maps show a 30% increase in acreage designated within the highest severity category. Our entire neighborhood — including the proposed development — is classified as Zone 0, the most extreme fire-risk zone. Having personally evacuated multiple times in recent years, I know how urgent and real this danger is.

There also remains considerable uncertainty regarding whether this project meets the CEQA threshold, especially concerning cumulative impacts, wildlife movement, hillside stability, and wildfire response safety. Additionally, the project appears to conflict with the spirit and intent of the Malibu Local Coastal Program, which allows for discretionary reductions in allowable building size when environmental protection and hazard mitigation warrant it.

Water use is another significant concern. Larger homes require larger septic systems and greater water consumption, increasing the potential for stress on our watershed and contamination of the water table. These impacts must be given thorough and transparent review.

Finally, the approval of this project sets a precedent with long-lasting consequences for all current and future residents. Decisions made in a Zone 0 community must prioritize fire safety, environmental stewardship, and responsible development above all else.

Request

For these reasons, I respectfully urge the County to:

- Uphold the LVHF appeal
- Reevaluate the project with full CEQA compliance
- Exercise discretionary authority to require reduced building sizes

- Prioritize community safety and environmental protection in this highly sensitive corridor

Closing

Thank you for your time and attention to this matter. This development is very close to me and directly north of my property. I have personally experienced multiple wildfire evacuations in recent years. My concern is not about limiting who can live here - it's about making sure that both current and future residents are protected with responsible planning, appropriate building size, and proper environmental review. This is a community I care deeply about, and I want it to be safe and sustainable for everyone who calls it home.

I appreciate your commitment to protecting both the residents and the long-term integrity of the Mulholland/Cold Creek region.

Warm regards,

Linda M Yannetty
2188 Cold Cyn Rd
Calabasas, CA 91302
(310) 913-8401



633 West Fifth Street
Suite 5880
Los Angeles, CA 90071
213.557.7222
www.rpnllp.com

Elisa Paster
213.557.7223
Elisa@rpnllp.com

November 18, 2025

VIA EMAIL

Chair Barger and Members of the Los Angeles
County Board of Supervisors
c/o Cristina Talamantes Marquez
Supervisor, Agenda Preparation & Ordinances
Board of Supervisors Executive Office
(213) 974-1442
ctalamantes@bos.lacounty.gov

Re: Supplemental Rebuttal to Appeal of the Regional Planning Commission's Decision Relating to Housing Development Project No. 2019-000010-(3)

Dear Madam Chair and Members of the Board of Supervisors:

We represent Green Hills Associates, Inc. (the "Applicant"), the applicant and appellee for a proposed development consisting of four new single-family residences on four contiguous and independently subdivided parcels along Mulholland Highway consisting of Assessor Parcel Numbers (APN's): 4455-019-044, 4455-019-045, 4455-019-046 and 4455-019-047 (the "Project") on a site located in the County of Los Angeles ("County"). The Los Angeles County Board of Supervisors ("Board") is scheduled to hear the appeal ("Appeal") of the Regional Planning Commission's denial of the appeal of the Zoning Administrator's approval for the Project at the scheduled public hearing on November 25, 2025. This letter provides information that supplements our detailed rebuttal letter to the Board dated November 11, 2025¹.

A. The Applicant is Willing to Provide Additional Landscaping on Lot 4

As a concession to the neighbors, the Applicant is willing to provide additional landscaping on Lot 4 along the eastern property line, to the extent such landscaping is permitted by the Department of Regional Planning, the Fire Department, and any other County departments. Attached hereto as Exhibit A is a depiction of that additional landscape buffer. The Applicant is also willing to work directly with the abutting neighbor regarding the desired height of the additional landscaping. Specifically, we would work with the neighbor to establish whether they would prefer lower landscaping or taller landscaping,

¹ Nothing in this letter waives our previous argument that the County has failed to comply with the Housing Accountability Act, specifically Government Code Sections 65589.5 and 65905.5 because the County has held more than five hearings for this project.

depending on their preference. We suggest addition of the following condition to memorialize the Applicant's voluntary measure:

"To the extent permitted by the County, the Applicant shall install an enhanced landscape buffer of not less than three feet in width along the portion of the property line of Lot 4 that abuts any structure on the neighboring property to the east. The Applicant shall coordinate with the eastern neighbor on the height of the additional landscaping, so long as such landscaping is permitted by the County."

B. The Project Does Not Maximize Building Size

Appellants argue that the Project is maximizing development on the Project Site, despite evidence to the contrary. For example:

- As shown in Exhibit B, the home on Lot 3 has been reduced by 20% in size, at staff's request.
- As shown in Exhibit C, large portions of the Lot 3 home are significantly below the 18-foot height limit. While the Applicant could have increased the home size by building a taller building (potentially with multiple stories) or a basement, the design instead minimizes the extent to which the home reaches the 18-foot height limit. This design is also followed by both Lots 1 and 2, in which the homes are significantly below the height limit.
- Similarly, as shown in Exhibit D, large portions of the home on Lot 4 are significantly below the 18-foot height limit. The design of this home was purposefully designed to be significantly under the allowable height limit to minimize its impact on the existing adjacent home to the east. While the Applicant could have increased the home size by building a taller building (potentially with multiple stories) or a basement, the design instead minimizes the extent to which the home reaches the 18-foot height limit.
- The County allows lot coverage of 10,000 square feet. Lot 2 proposes 9,540 sf, Lot 3 proposes 9,682 sf, and Lot 4 proposes a coverage of 9,286. While the Project could have maximized coverage on each lot, it did not do so.

Importantly, as discussed in our November 11, 2025, letter, the proposed homes on the Site's four existing lots will have building areas less than the average square footage of neighboring properties within an approximate 600–700-foot radius (4,224 square feet/per residence).

C. Good Neighbor Construction Practices

As demonstrated throughout this project, the Applicant has responded in good faith to the County's and Appellants' concerns. To further demonstrate a commitment to being a good neighbor, the Applicant will implement the following good-neighbor construction practices:

- **Pre-construction notice:** Provide a courtesy notice to nearby neighbors 2–3 weeks in advance with the tentative construction schedule, work hours, and any haul routes.

- **Single point of contact:** Maintain one dedicated contact for the full construction period, with name/phone/email posted on site.
- **Construction hours:** Strictly adhere to County-allowed construction hours.
- **Worker parking plan:** Keep all crew vehicles on-site or in designated areas—no street or shoulder parking—during all construction hours.
- **Dust mitigation:** Use water trucks as needed, cover stockpiles, stabilize site entrances, and enforce a 15-mph on-site speed limit.
- **Dark-sky compliant lighting:** During construction, use shielded, downward-aimed, motion-activated security lighting only (no constant illumination).

Best regards,

Elisa Paster

Elisa Paster
Managing Partner
of RAND PASTER & NELSON, LLP

Attachments:

Exhibit A: Lot 4 Landscape Buffer

Exhibit B: Lot 3 Size Reduction

Exhibit C: Lot 3 Height Limit Reduction

Exhibit D: Lot 4 Height Limit Reduction

Exhibit A

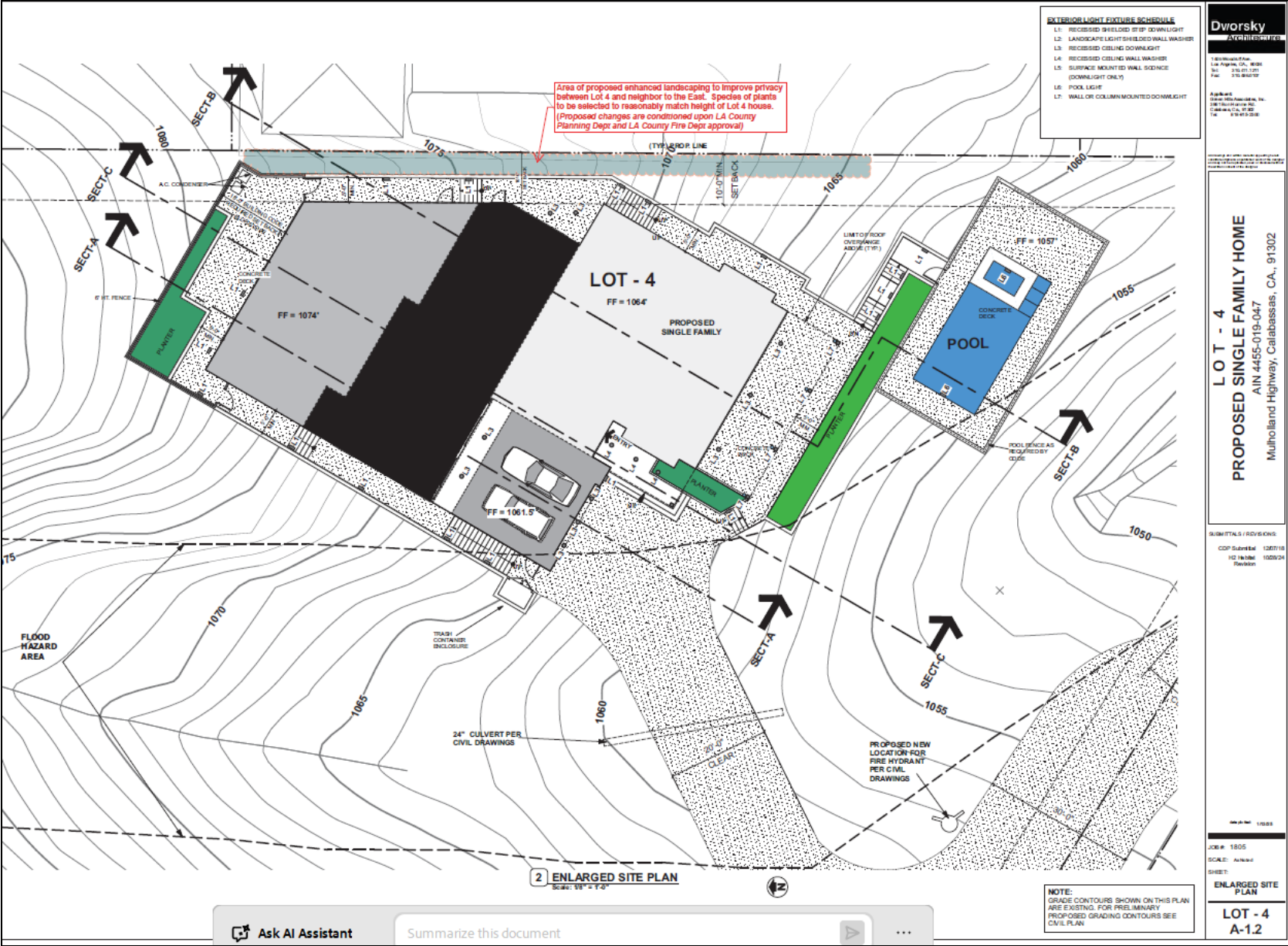


Exhibit B

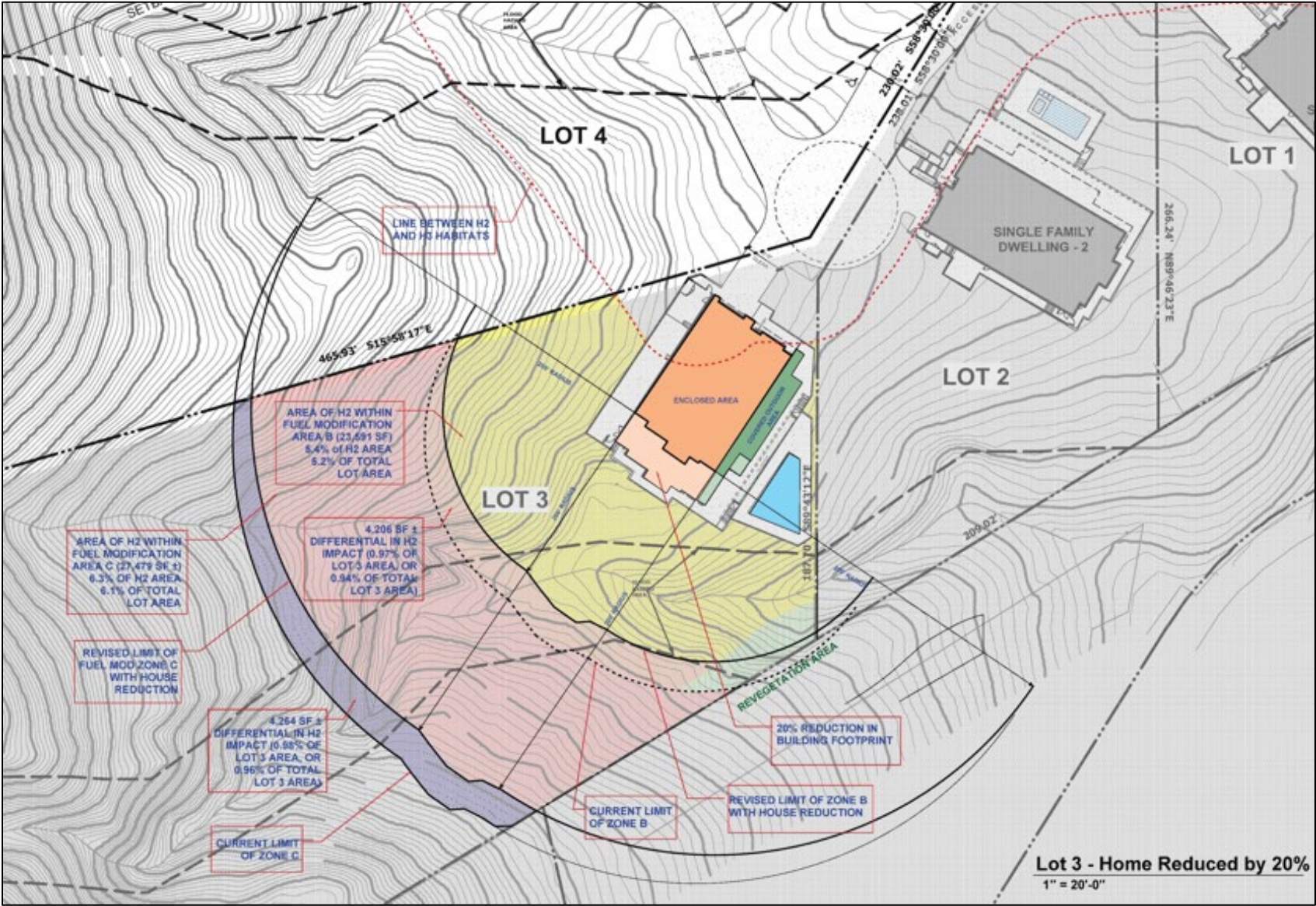


Exhibit C

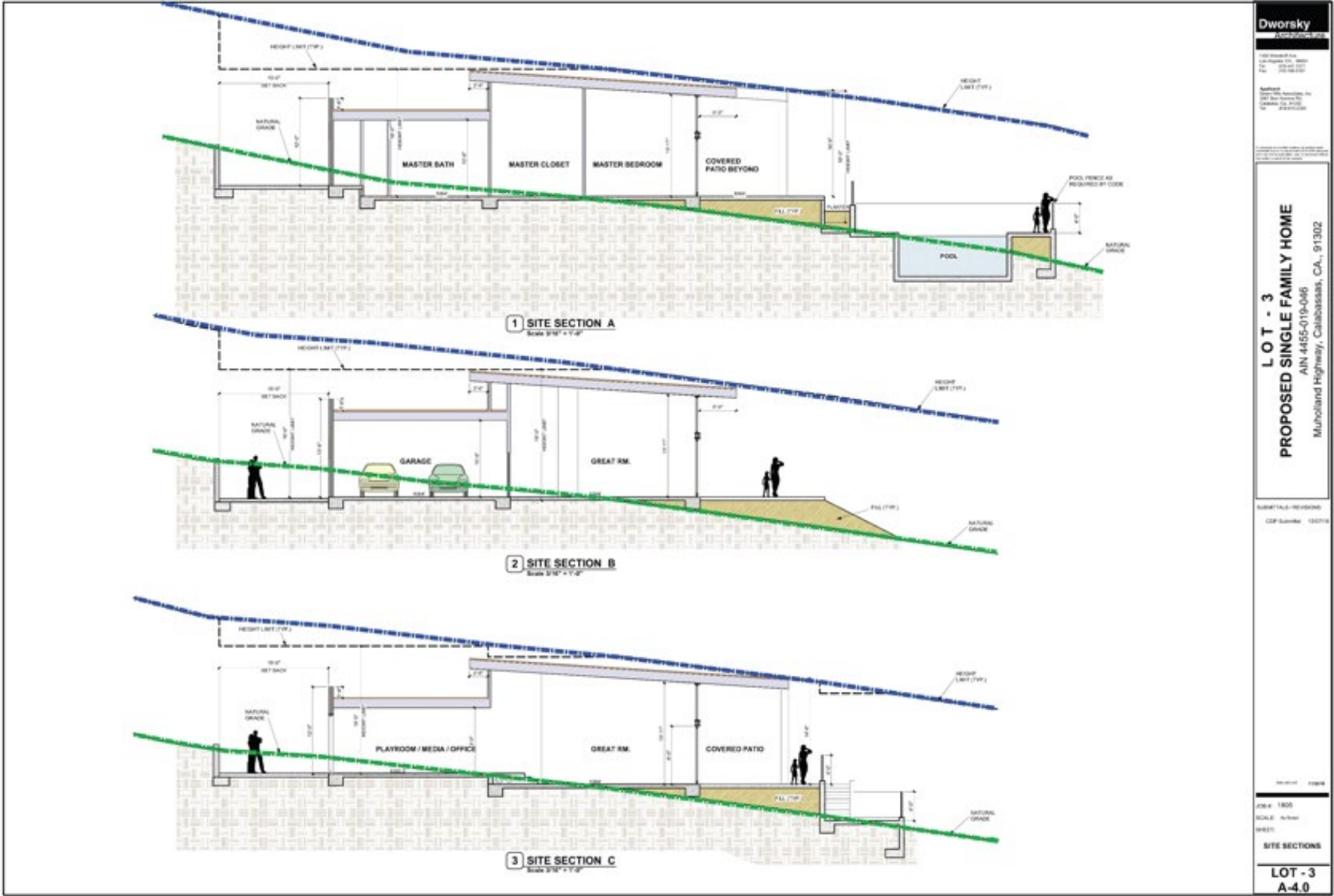
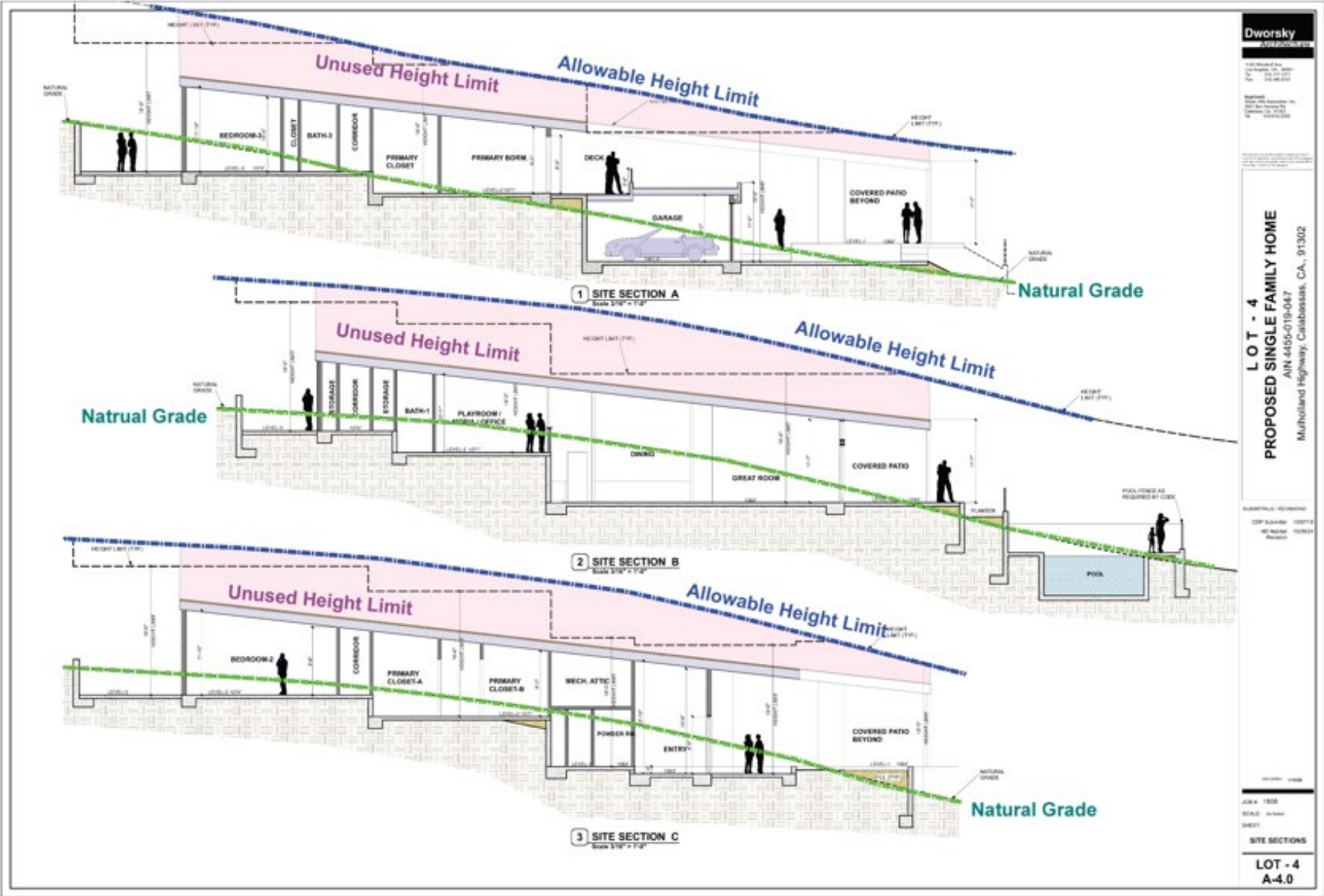


Exhibit D



Bob Holloway Fire Life Safety Consultant, LLC

18723 Via Princesa Santa Clarita, CA

661-713-5697

robholloway78@gmail.com

November 1, 2025

Dear Honorable Members of the Los Angeles County Board of Supervisors,

I am writing as a Retired Los Angeles Fire Captain with 37 years of extensive experience in structural and wildland fire fighting. My career evolved into many years of work developing a broad comprehensive knowledge in new construction development including the plan check inspection process. I am also a longtime resident of Los Angeles County.

This letter is in response to the appeal submitted by an adjacent property owner and the local Homeowners Federation referring to the proposed residential development at 24937 Mulholland Highway in Calabasas.

I strongly express my support for the proposed single-family residential development located between existing developed homes in the Very High Fire Hazard Severity Zone (VHFSZ) adjacent to the Wildland-Urban Interface (WUI). This infill project represents responsible smart growth that aligns with the County's housing needs while incorporating modern fire safety standards. This project proposes the construction of four modest single-family residences located between existing developed homes. This infill development in established neighborhoods situated between existing homes, is a critical strategy for addressing Los Angeles County's severe housing shortage without encouraging and expanding urban sprawl into more remote high risk wildfire areas.

By filling gaps in already developed areas with access to existing infrastructure of roads and services, this project would replace unmanaged open-space with carefully planned code compliant homes that incorporate state of the art wildfire protection measures.

At present, the site consists of an open field with dense vegetation within a VHFSZ and near the WUI. In its current condition this parcel could act as a fuel corridor, allowing a potential fire to move rapidly between neighboring properties. The proposed development will dramatically change the neighborhood dynamic by creating an extensive bold defensible space around and between all new and existing structures.

Although the site is within a VHFSZ and near the WUI, new construction in those zones is governed by rigorous State and Los Angeles County Fire Safety regulations that far exceed those for older homes.

All new buildings must comply with Chapter 7A of the California Building Code and Los Angeles County Amendments including:

- Fully Sprinklered Structures
- Fire Resistant Construction Features
- Fuel Modification with Defensible Space Requirements
- Compliances with the County's Very High Fire Hazard Severity Zone.

Those above measures, combined with required approvals from the Los Angeles County Fire Department, ensure that the new homes will be significantly more resilient to wildfire than many existing structures in the area.

Approving this project will:

- Provide much needed single-family housing in a County facing a statewide housing crisis.
- Promote safer more sustainable growth by utilizing existing neighborhoods rather than expanding into pristine wildlands.
- Enhance community resilience through modern code compliant construction.

Collectively these measures will result in a net reduction of wildfire risk to the neighborhood.

The introduction of managed integrated and maintained defensible areas will serve as a protective barrier to adjacent homes, offering a level of fire resilience that does not currently exist on the site.

In summary, I urge the Board to approve this development, ensuring all required fire mitigation measures are fully implemented. This is an opportunity to demonstrate that Los Angeles County can meet its housing goals responsibly, even in fire prone areas, by prioritizing infill over sprawl.

I appreciate the Boards time and consideration on this matter. I am confident that the technical evidence supports approval of this project.

Respectfully,

Robert S. Holloway

LAFD Captain Retired

Fire Life Safety Consultant



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Elisa Paster
213.557.7223
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November 11, 2025

VIA EMAIL

Chair Barger and Members of the Los Angeles
County Board of Supervisors
c/o Tyler Montgomery, AICP
Principal Planner, Coastal Development Services
tmontgomery@planning.lacounty.gov

**Re: Rebuttal to Appeal of the Regional Planning Commission's Decision Relating to Housing
Development Project No. 2019-000010-(3)**

Dear Madam Chair and Members of the Board of Supervisors:

We represent Green Hills Associates, Inc. (the "Applicant"), the applicant and appellee for a proposed development consisting of four new single-family residences on four contiguous and independently subdivided parcels along Mulholland Highway consisting of Assessor Parcel Numbers (APN's): 4455-019-044, 4455-019-045, 4455-019-046 and 4455-019-047 (the "Project") on a site located in the County of Los Angeles ("County"). The Los Angeles County Board of Supervisors ("Board") is scheduled to hear the appeal ("Appeal") of the Regional Planning Commission's denial of the appeal of the Zoning Administrator's approval for the Project at the scheduled public hearing on November 25, 2025.

As a preliminary matter, the November 25, 2025 Board hearing will be a separate and independent violation of the Housing Accountability Act's ("HAA") five-hearing rule, just as both the Hearing Officer and RPC hearings were separate and independent violations of the HAA. On that basis alone, the pending appeal should be denied. **The Applicant has spent almost seven years trying to obtain approval of this modest housing development project.** Indeed, the Applicant has bent over backwards to respond to changing staff direction and neighborhood input, making meaningful modifications to the Project. Even so, the unreasonable and unwarranted delays of this Project highlight the County's bad faith in processing the Project.

Even if the County were not in violation of the HAA, we urge the Board to deny the pending appeal ("Appeal") filed by the Las Virgenes Homeowners Federation ("LVHF") because it is wholly without merit. The Project is compliant with all relevant plans and policies, including Coastal policies, and the Mitigated Negative Declaration prepared for the Project is legally sound. The Appeal is grounded in NIMBYism, not in fact. Indeed, the Applicant made multiple attempts to work with the Appellant to modify the Project to satisfy Appellant's concerns. Applicant was rebuffed in every instance.

Now is the time to move the Project forward. Given the severe housing crisis in Los Angeles County, made worse by the devastating fires, we urge the Commission to deny the appeal and to approve the Project. Please put this letter into the administrative record for the Project.

I. Violation of Government Code Section 65905.5 (Number of allowed Public Hearings)

The original hearing for this matter was scheduled for May 28, 2024 before the Hearing Officer, over eighteen months ago, and more than five years after the Applicant formally submitted and proposed this modest Project in 2019. Too much time has passed since this Project was submitted, and the County has violated the HAA. Government Code Section 65905.5, subdivision (a) clearly states that “if a proposed housing development project complies with the applicable, objective general plan and zoning standards in effect at the time an application is deemed complete, after the application is deemed complete, a ... county, ... **shall not conduct more than five hearings** pursuant to Section 65905, or any other law, ordinance, or regulation requiring a public hearing in connection with the approval of that housing development project. If the ... county ... continues a hearing subject to this section to another date, **the continued hearing shall count as one of the five hearings allowed under this section.**”¹ (Emphasis added.) The approval of the Project by the Hearing Office confirms that the Project complies with all objective standards, as discussed in further detail in the staff report. The County already has continued the hearing for the Project more than five times, thus undermining the purpose of the statute to help alleviate the State housing crisis in an expedient manner. Between the already held public hearings and continuances and this hearing, **ten public hearings** have occurred.

Under Assembly Bill 1893, which went into effect January 1, 2025, failure to comply with the five-hearing rules constitutes a disapproval of a housing development project under the HAA,² which can result in the imposition of fines and attorneys’ fees. The Legislature described the recent revisions as expanding “the scope of local government actions that constitute disapproval of a project to include instances where a local government ‘effectively disapproves’ a project through sustained inaction or the imposition of burdensome processing requirements.”³ The County’s multiple continuations since May 2024, including the most recent proposed continuance to July, “effectively disapproves” the Project through the County’s “sustained inaction.” The law is clear that the County has already violated the HAA and that any further continuances or hearing for the Project by the County constitute separate and independent violations of the HAA. On that basis alone, the Appeal should be denied.

II. Applicant’s Compliance and Arguments to Appeal

Since 2019, the Applicant has remained cooperative, transparent, and responsive to questions and concerns raised by the County as well as neighborhood groups. The Project has been ongoing at the County for over five (5) years and has remained in full compliance with all applicable development

¹ The Department of Housing and Community Development (“HCD”) further confirmed that “the local government can **conduct a maximum of five hearings, including hearing continuances**, in connection with the approval of the project.” (Emphasis added.) See HCD’s *Housing Accountability Act Technical Assistance Advisory* (Sept. 15, 2020), p. 27, available at <https://www.hcd.ca.gov/community-development/housing-element/housing-element-memos/docs/hcd-memo-on-haa-final-sept2020.pdf>.

² Gov. Code § 65589.5(h)(6)(E).

³ Sen. Rules Com., Off. of Sen. Floor Analyses, 3d reading analysis of Assem. Bill No. 1893 (2023-2024 Reg. Ses.) as amended Aug. 23, 2024, available at https://leginfo.legislature.ca.gov/faces/billAnalysisClient.xhtml?bill_id=202320240AB1893#.

standards. Multiple modifications to the Project have been made at the request of the County and community members to ensure consistency with applicable regulations and address environmental and neighborhood concerns as further outlined below.⁴

a. Consistency with Applicable Plans and Community Character

Contrary to the Appellant's claims the Project is fully consistent with all the relevant current and applicable development standards for residences in the Santa Monica Mountains Local Coastal Program ("LCP"), consisting of the Land Use Plan ("LUP") and Local Implementation Plan ("LIP"), and the Scenic Resource Area ("SRA") as noted and confirmed by the County in their Staff Report dated January 21, 2025. The Applicant is committed to ensuring that the Project is compliant with the LUP's general guiding principle that "environmental and coastal resource protection taking priority over land use and development," (page 96 of the LUP) and has designed the Project accordingly. The Project demonstrates a commitment to the built environment and neighboring properties by incorporating design elements that respect community character, ensure compatibility with surrounding structures, and minimize environmental impact. A longer discussion of the Project's compliance is described in Attachment A of this letter.

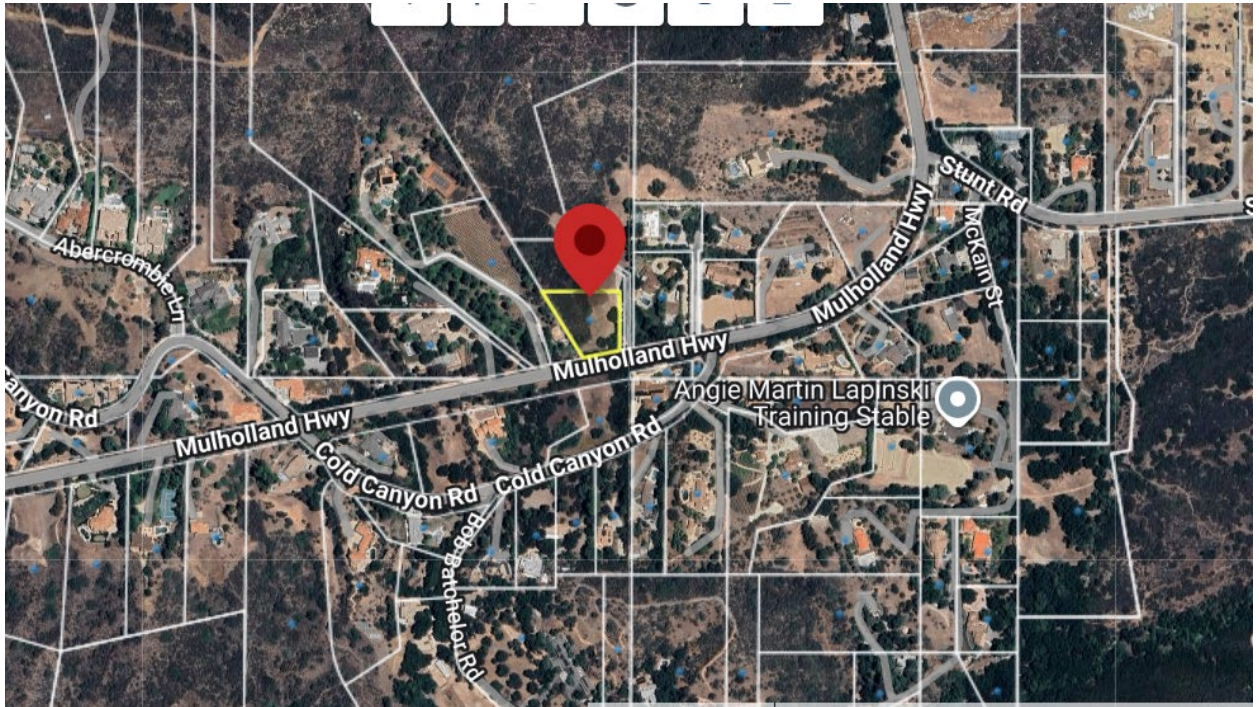
b. The Project is an Infill Project

As Commissioner O'Connor explained in her remarks at the RPC hearing, there is substantial evidence demonstrating that the Project is an infill project:

COMMISSIONER O'CONNOR: "...one of the most compelling things that I saw was in the Applicant's presentation – which frankly could be a little bit clearer though – they do in their Attachment B Study Area Map, **they show in this cluster of where existing buildings are.** Now there are several buildings uhm.. such as the four that I proposed, and there's a lot next to it that's either undeveloped or there's nothing there and there were a few others. I think maybe there were.. let's see.. one, two, three, four.. about six others that in the numbers, the numbers would range from something like 1 to 38 properties that were developed, so there are about 6 of them that appear not to be. But when you look at this Map, you see that this is an area that I wouldn't go as far as to say is urbanized – but certainly it is a cluster of buildings. **So, so if you're going to talk about resource conservation you would want to put whatever new development is going in in this area rather than have it sprawling in other areas of the mountains.** So the real resource conservation is again to limit development in the mountains. **So when you do have these legal parcels uh.. they're legally.. I'm convinced they're legal, and so you have the property rights, this is the place where you would put them rather than, again, rather than sprawling out....** So again adding these additional – and the Applicant actually did provide other information because we did hear that there are mega mansions up there, and **I can see from looking at the data that I assume is accurate here, you know, there's a 7,000 square foot existing home and 6,000 and 8,000 and if you look at their information they've provided**

⁴ Additionally, the Applicant has diligently attempted to engage with local stakeholders, including a January 25, 2024 presentation to the Las Virgenes Homeowners Federation, Inc., an unanswered email to the Cold Creek Community Council on August 29, 2024 to request a virtual presentation of the Project, and numerous attempts in May 2024 to coordinate an onsite meeting with Ms. Kimberly Rino, a local resident referenced in opposition correspondence. Other offers to engage in face-to-face discussions with neighbors have been consistently ignored.

almost half are larger.. are already.. you know, almost half of those homes up there are already mega mansions, so is that changing the character of the area when you have at least 10 of them being over 4,000 some square feet...."⁵



The infill nature of the Project is clear by simply looking at the map of the surrounding area. The Site is surrounded by existing development, including many homes that are much larger than the homes in the Project. The existing subdivision where the Project will be located is flanked by existing homes, a vineyard, and Mulholland Highway. Appellants would have the Board believe that the Project is developing virgin land in the middle of nowhere; but the reality is that the Site is within an established developed area.

Also, the Project is similar in character to other single-family residences in the area in terms of height and bulk, maintaining compliance with the building site area (less than 10,000 square feet), one-story building heights of no greater than 18 feet above grade, and comparable in size to most other residences in the surrounding area. As set forth in the study in Attachment B, the proposed homes on the Site's four existing lots will have building areas less than the average square footage of neighboring properties within an approximate 600-700 foot radius (4,224 square feet/per residence) and are consistent and compatible with the surrounding area.

⁵ LA County Planning, Regional Planning Commission Hearing, July 23, 2025, Time Stamp: 1:21:44 To 1:24:40 (emphasis added).

Average SF of Neighboring Residences	4,224 Square Feet
Project APN-Lot	Project Building Square Feet
4455-019-044-Lot 1	4,114 square feet
4455-019-045-Lot 2	4,138 square feet
4455-019-046-Lot 3	3,291 square feet (proposed reduced size)
4455-019-047-Lot 4	4,186 square feet

c. The Project Will Be More Fire Resistant Than Existing Development

As the Project relates to fire and life safety, the Applicant is in full compliance with all fire codes and has received preliminary approval from LA County Fire based on its detailed review of the plan. The Applicant is taking full responsibility to ensure that all the four homes will not only meet all required County Fire standards but exceed those standards where applicable. Some of these extra fire protective measures could include, but are not limited to the following:

- Fire Resistance Dens Glass Sheathing and or cement under all exterior cladding materials.
- Substituting wood siding with composite siding.
- Installation of fire sprinkler systems on the rooftop of all residences so long as allowed and approved by the County.

The Applicant is completely sympathetic to the most recent wildfire devastations that have impacted the region and victims and is therefore willing to commit to the above protection measures making the residences more fire defensible than neighboring properties. In fact, the Applicant has been actively involved in doing pro bono work in the rebuilding efforts for victims who were affected by the Palisades Fire and understands the need for robust fire protection.

The Applicant reserves the right to submit additional information on this subject, and all others, prior to the November 25, 2025 meeting.

d. Location of Residence-Lot 4

Regarding the location of the residence for Lot 4 positioned directly adjacent to two existing residences to the east, this was redesigned/repositioned at the request of the County in September of 2024. While opponents characterize the location of the residence proposed for Lot 4 as too close to the adjacent residence to the east, its location complies with the required side-yard setback for a flag lot (10 feet from the property line). This location was chosen by the Applicant to avoid restricted flood hazard zone that runs through the middle of Lot 4, such that the residence should be placed on either the eastern or western portion of the property. A residence on the western portion of the property would result in significantly more fuel modification within the H2 Habitat. The re-location of the residence to the eastern side of the property (10 feet) reduces the amount of disturbance in the H2 habitat area (5,717 sf differential) from 35 % (original plan) to 29.5% (current plan). Additionally, relocating the home to the west side of the flood hazard area would place the residence very close to the residence on Lot 3.

In such case, the open space buffer zone between the homes on Lots 3 and 4 would not exist and the goal of achieving a rural character created by such a buffer zone would not be achieved.

Further, only a portion of the residence (at the north end) is proposing a 10-foot setback, the remainder of the residence along the eastern side yard towards the south end provides up to a 32-foot setback from the property line.

e. Impacts on Wildlife and Biology Will Be Less Than Significant

Regarding wildlife protection concerns raised by the Appellant, we are in acknowledgement of the letter sent by the Santa Monica Mountain Conservancy dated February 24, 2025 and do not have any objections to deed-restrictions being placed on the property to ensure that adequate wildlife movement is maintained throughout the properties. Appellants' claims that the Project would impact wildlife are speculative and unsupported by evidence. In fact, the Mitigated Negative Declaration imposes mitigation measures including on-site biological monitor, a pre-construction biological survey, wildlife protection screening, habitat restoration, and a native bird survey, all of which will reduce the impacts to a level of insignificance.

Similarly, Appellant's contention that impacts on trees or that the project does not provide sufficient tree coverage are speculative. As noted by the MND, the Project will include the planting of 12 live coast oaks, and retention of additional undersized scrub oaks and coast live oaks on site within approximately 28,931 square feet of preserved undeveloped areas, which would result in approximately a 2:1 replacement ratio.

f. Applicability of "Grandfathered" Zoning Ordinance/Location of Residence-Lot 4

As described above in Section I, the Project complies with all current and applicable development standards for residences in the Santa Monica Mountains LIP, LCP, and SRA areas, contrary to the false and speculative comments in the Appeal on this subject. The Applicant has complied with all current applicable zoning regulations and land use policies and has further obliged all requested design changes from County staff and its plans will be subject to the most recent version of the building code.

Appellants raise a speculative concern about impacts on utilities. There is no evidence to support this statement. Construction will not occur on neighboring properties, Appellants have no easements across the Applicant's property, and no impacts will occur.

The Applicant has worked diligently and in good faith for over five years to bring forward a modest, code-compliant project that aligns with the County's development standards, the Local Coastal Program, and fire safety regulations. The Project has undergone multiple revisions in response to County and community feedback and now represents a carefully balanced design that minimizes environmental impact while providing much-needed housing. The numerous continuances already held have exceeded the limits imposed by State law, and any further delay risks violating the HAA. We respectfully urge the Regional Planning Commission to uphold the Hearing Officer's approval and deny the appeal, allowing this long-pending Project to proceed in accordance with State and local policy objectives.

Los Angeles County Board of Supervisors
November 11, 2025
Page 7

Best regards,

Elisa Paster

Elisa Paster
Managing Partner
of RAND PASTER & NELSON, LLP

Attachments:

A: Consistency with LCP/LUP

B: Nearby Study Area Map of existing residential building SF

Attachment A

Consistency with LCP/LUP

Water Quality Goals and Policies

- **CO-4** Minimize impervious surfaces in new development, especially directly-connected impervious areas. Require redevelopment projects to increase the area of pervious surfaces, where feasible.
 - *All the sites incorporate minimal grading and building pads that are designed in order to minimize the amount of impervious surface area. Each of the residences' footprints incorporate pervious planters to recapture some of the pervious surface area and aid in stormwater runoff. In addition, on-grade landscape areas have been designed at the perimeter of the building sites to aid in the increase of pervious surface areas. Lastly, the location of the residences are situated as close to the existing shared driveway and access to the site in order to limit the driveway (impervious) surface area to each site.*
- **CO-5** Infiltrate development runoff on-site, where feasible, to preserve or restore the natural hydrologic cycle and minimize increases in stormwater or dry weather flows.
 - *All the sites have been designed with numerous area drains primarily located at the perimeter of the building pads near the base of the natural grade and run-off areas on site that helps minimize stormwater or dry weather flows.*
- **CO-6** Require development to protect the absorption, purification, and retention functions of natural drainage systems that exist on the site. Where feasible, site and design development, including drainage, to complement and utilize existing drainage patterns and systems, conveying drainage from the developed area of the site in a non-erosive manner. Disturbed or degraded natural drainage systems should be restored where feasible.
 - *All the sites have been designed with 24" x 36" catch basins to help with stormwater flow that utilize the existing drainage pattern and consistent with the grade and slope of the sites to minimize stormwater run-off. Additionally, each of the sites have been designed with rain flow tanks (rainwater capture) re-use systems to help with onsite drainage in a non-erosive manner.*
- **CO-10** Limit grading, soil compaction and removal of locally indigenous vegetation to the minimum footprint needed to create a building site, allow access, and provide fire protection for the proposed development. Monitor grading projects to ensure that grading conforms to approved plans.
 - *Configuration of residences was thoughtfully designed to step gently with the sloping topography, thus minimizing grading. The location of all the residences have been situated as close to the existing shared driveway and access to the site in order to further limit the amount of grading and removal of indigenous vegetation, allowing access and providing fire protection for the site.*

Land Use Plan Policies

- **LU-4** Maintain areas of diverse natural topography which provide, through the preservation of large undeveloped areas, long-range vistas of open ridgelines and mountain slopes.
 - *Both lots 3 and 4 have been sited and designed to preserve the most high resource areas that maintain large undeveloped areas and ridgelines, as discussed in more detail below.*
- **LU -5** Prohibit development on Significant Ridgelines, following those LUP policies and standards designed to protect ridgeline resources.
 - *Lots 3 and 4 have significant ridgelines at far north end of the site and the residences are well outside of a designated secondary ridgeline protecting the ridgeline resources.*
- **LU-29** Maintain low densities within Rural Lands and Rural Residential areas and protect the features that contribute to rural character and rural lifestyles by:
 - Retaining the natural terrain and vegetation in hillside areas, rather than creating large, flat pads;
 - Protecting natural vegetation, natural environmental features, and streams;
 - Sizing houses and flat pad areas to be consistent with the natural setting; limiting features such as tennis courts and paved areas;
 - Protecting hilltops and ridgelines by prohibiting structures in those areas where feasible;
 - *The configuration and location of the residences are designed to step up gently with the topography thereby retaining the natural terrain and vegetation in the steeper portions of the lots. The sizing of the residences and useable outdoor areas are consistent with the natural setting in that they are terraced with the existing grade with minimal amounts of cut and fill. This design creates a pattern of land use that preserves the environmental resources and unique character of the land within the SM Mountains. In addition, the homes have been located to preserve open space buffers between each home reinforcing the rural character of the neighborhood and making the natural topography apparent surrounding each building site.*
- **LU-34** Require that new development preserve views from public parks, trails, and designated Scenic Routes. This includes preserving and enhancing views from public roadways which are oriented toward existing or proposed natural community amenities such as parks, open space, or natural features.
 - *The site is situated along a portion of Mulholland Highway that is a designated scenic route. The project lots and proposed residences are sited in a manner that it is not visible from Mulholland and intends to preserve existing views from the roadway and does not impact community amenities or natural features. Additionally, the view of the properties from Mulholland Highway is substantially blocked by a steep and high berm along Mulholland with a thick cover of natural vegetation. This feature will be preserved as part of the proposed development.*
- **LU-38** Limit structure heights to ensure protection of scenic resources and compatibility with surrounding settings.
 - *The proposed residences are only one-story in height and do not exceed 18 feet in height ensuring protection of scenic resources and the surrounding settings. In some*

cases, and especially at Lot 4, the proposed height is less than that allowed by the current Zoning Code.

- **LU-43** Limit exterior lighting, except when needed for safety. Require that new exterior lighting installations use best available Dark Skies technology to minimize sky glow and light trespass, thereby preserving the visibility of a natural night sky and stars and minimizing disruption of wild animal behavior, to the extent consistent with public safety.
 - *Exterior lighting has been designed to minimize impacts by providing light fixtures with shielded recess step lights, and recessed downlights in exterior soffits thereby preserving dark skies and natural night skies and stars.*

Biological Resources Goals and Policies

- **CO-51** Where new development is permitted in H2 habitat pursuant to this LCP, the maximum allowable building site area on parcels shall be 10,000 square feet, or 25 percent of the parcel size, whichever is less. Where new residential development is permitted in H3 habitat, the maximum allowable residential building site area shall be 10,000 square feet, or 25 percent of the parcel size, whichever is less.
 - *The lots in which are located within in the H2 and H3 habitat zones do not exceed the maximum allowable building site as indicated above.*
- **CO-70** A site-specific Biological Inventory shall accompany each application for all new development. A detailed Biological Assessment report shall be required in applications for new development located in, or within 200 feet of, H1, H2, or H2 “High Scrutiny” habitat, as mapped on the Biological Resources Map, or where an initial Biological Inventory indicates the presence or potential for sensitive species or habitat. The County Biologist shall conduct preliminary review of all development, regardless of whether the proposal must be considered by the Environmental Review Board (ERB).
 - *A Biological Assessment report and restoration plan was prepared for all four parcels. The Biological Assessment confirms that the Project is consistent with this policy and that it would not result in any significant impacts under the California Environmental Quality Act.*
- **CO-76** All new development shall be sited and designed so as to minimize grading, alteration of physical features, and vegetation clearance in order to prevent soil erosion, stream siltation, reduced water percolation, increased runoff, and adverse impacts on plant and animal life and prevent net increases in baseline flows for any receiving water body.
 - *The siting of the residences is designed to minimize grading with minimal amount of cut and fill and will be consistent with building site area of 10,000 square feet. All vegetation clearance will be minimal to the extent possible and be restored or mitigated in order to prevent soil erosion, increased runoff and adverse impacts on plant and animal life. Additionally, landscape restoration plans are a part of the application for these properties.*

Fuel Modification Policies

- **CO-96** All new development shall be sited and designed to minimize required fuel modification and brushing to the maximum extent feasible in order to minimize habitat

disturbance or destruction, removal or modification of natural vegetation, and irrigation of natural areas, while providing for fire safety. Development shall utilize fire-resistant materials. Alternative fuel modification measures, including but not limited to landscaping techniques to preserve and protect habitat areas, buffers, designated open space, or public parkland areas, may be approved by the Fire Department only where such measures are necessary to protect public safety. All development shall be subject to applicable federal, State and County fire protection requirements.

- *Both lots 3 and 4 building pads have been sited to minimize the least amount of disturbance to fuel modifications zones B and C. The design revisions proposed by the Applicant to Lots 3 and 4 will further reduce the impact due to Fuel Modification on both properties.*

Attachment B-Study Area Map

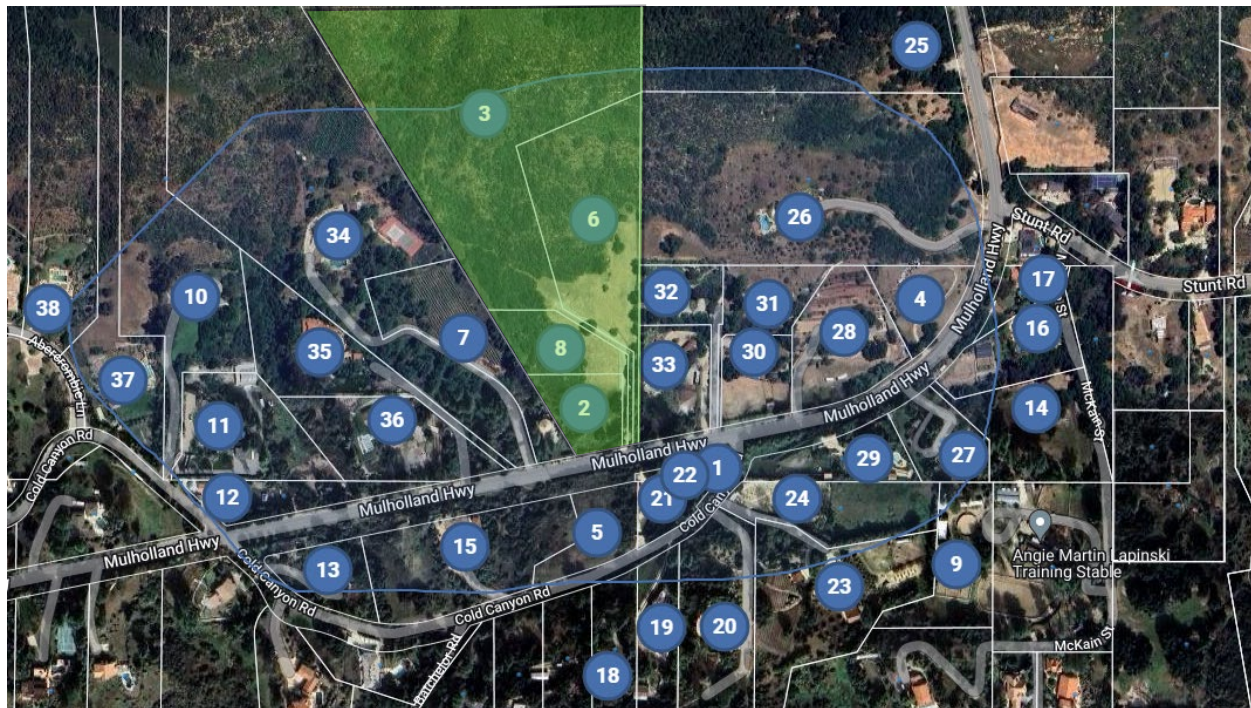
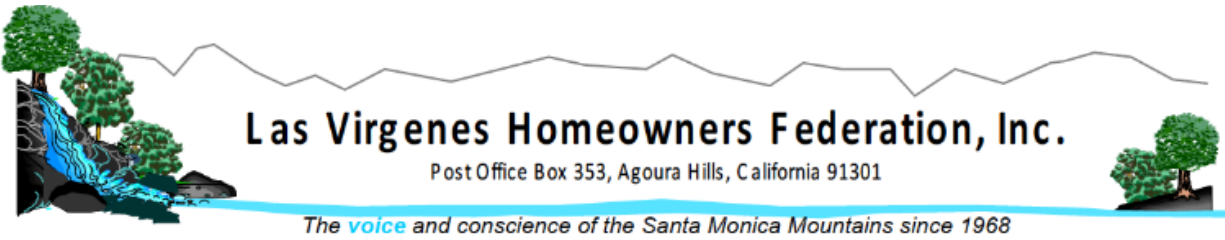


Table of Residential Building Area Square Footage

APN	Corresponding ID # on Study Area Map*	Building Square Feet
4455-019-015	25	1,008
4455-019-016	26	6,526
4455-019-025	28	2,777
4455-019-027	17	3,912
4455-019-028	29	3,060
4455-019-029	27	3,181
4455-019-030	14	2,240
4455-019-031	16	2,932
4455-019-034	30	3,343
4455-019-035	31	2,076
4455-019-036	32	3,852
4455-019-041	11	5,172
4455-019-042	35	8,368
4455-019-043	36	5,255
4455-019-049	33	5,200
4455-019-050	34	7,170
4455-020-003	21	4,473
4455-020-004	19	2,198
4455-020-005	20	2,556
4455-020-006	23	2,760
4455-020-035	18	2,533
4455-020-041	13	4,584
4455-020-042	15	4,008
4455-020-044	24	3,604
4455-060-029	38	6,772
4455-060-030	10	6,224
4455-060-031	37	8,259
		Average: 4,223.81 sf

* Following ID's removed from average due to vacant land or no single-family residence on site:

4, 9, 6, 8, 2, 3, 7, 5, 22, 1



November 22, 2025

Los Angeles County Board of Supervisors
Kenneth Hahn Hall of Administration
500 W. Temple Street, Room 381B
Los Angeles, CA 90012

PROJECT NO. 2019-000010-(3)
MINOR COASTAL DEVELOPMENT PERMIT NO. RPPL2019000016, RPPL2019000017,
RPPL2019000018, RPPL2019000019

Honorable Supervisors:

The Las Virgenes Homeowners Federation appeals the approval of this project as proposed, by the Regional Planning Commission on May 6, 2025. The project proposes to develop 4 lots that maximize the allowable building site, a discretionary maximization that under the Santa Monica Mountains Local Coastal Program should apply only to parcels with NO constraints. Constraints apply to this subdivision.

Under LA County Code Section 22.44.1910.1, the discretionary maximization of the overall footprint of this project as with all development in the area has an impact on coastal resources and the entire community. Maximization is a ceiling not a baseline guarantee, despite a developer's wish. We contend this is a discretionary project.

As stated in our appeal, this project fails in its lack of:

- * Protection of sensitive habitat (i.e. pristine designated Cold Creek Watershed)
- * Avoidance of hazards (e.g. VHFHSZ fire safety issues, especially on Lot 4)

The precedent-setting approval of this 4-lot subdivision in the Santa Monica Mountains, approved 45 years ago, raises many questions about staff claiming conformity with the certified LCP. Was something missed in this our new reality, post the devastating Palisades Fire we

endured this past January? Is the LCP even relevant any more as documented by the continuous requests for exemptions brought before the planning department?

The Las Virgenes Homeowners Federation, some 20 associations with thousands of stakeholders in the Santa Monica Mountains, strongly supports the LCP mandate of **resource conservation over development in the coastal zone**. We recall when the County shared this the Federation's vision and we welcome a cooperative relationship again with mandated LCP enforcement.

We respectfully request that you support our appeal. We urge County Planning to go back and confirm this project was adequately evaluated under the LCP, use their discretionary ability to look again at the constraints on this project, minimize the impact on biological resources and avoid the hazardous impact in our Very High Fire Hazard Severity Zone.

Thank you,

Roger Pugliese, co president LVHF

Joan Slimocosky, co president LVHF

Mairead Mac Mullan
24879 Mulholland Highway
Calabasas, CA 91302

November 19, 2025

For Attention Of: Regional Planning Commission and LA County Supervisors,
Re: In response to the revised plans Project # 2019-000010-(3) for Parcel Map 10857 in 1981
Hearing Date: November 25, 2025

Dear Regional Planning Commission and LA County Supervisors,
I am writing today in support of The Las Virgenes Homeowners Federation Appeal to amend the planning granted to the 4 home subdivision proposal at the site of 24937 Mulholland Hwy. We have been working together diligently as a community to have LA County uphold the spirit of the LCP and keep the Santa Monica Mountains a home where the safety of wild life, wild land, people and property are the priorities of LA County and not the maximization of economic profit for developers at the expense of these basic rights.

Brief Summary:

The proposed planning application was first made known to the local community on April 22nd 2024 - when 4 sets of story poles were put up in the proposed location for these 4 homes. There had been no communication to neighbors from the developer pre that. Neighbors immediately put together a reasoned powerpoint objecting to particular aspects of the planning proposal. Los Angeles County Planning then created the following recommendations for the developer:

After taking a closer look at the project, we are recommending that the residences proposed for Lot 3 and Lot 4 be redesigned with smaller structural footprints and building site areas (BSA). This would reduce the overall impact of fuel modification on H2 Habitat for both of these lots. Several policies of the Santa Monica Mountains LCP Land Use Plan, as well as the Local Implementation Program, emphasize the importance of preserving H1 and H2 Habitat in its natural state, even if that means requiring less than the maximum allowed BSA and/or structural area. Reducing the size of the residences on Lot 1 and Lot 2 would not accomplish this, as the lots are smaller and contain much less H2 Habitat.

The developer then did reduce the footprint of the home furthest away from current residents (Lot 3) however did not make any changes to the Lot size of parcel 4 and actually moved it closer to the residents that are to the left of this lot and created no change to the dangerous proximity to the property line of the residents that are directly adjacent to this proposed lot. We are extremely confused by the fact that County did not insist on Lot 4 being reduced in size for the same reasons as Lot 3 - if anything Lot 4 makes way more sense to be reduced as it is right beside a flood plane which empties into the cold creek watershed and is jammed in against a fence line of a neighboring property - less than 60 feet from their home structure. Outside of the

fact that the proposed 4 home lots would never be granted with current Los Angeles County planning requirements, in lieu of the recent frequent and extremely destructive wild fires in the Los Angeles county area across all regions -planning permission from 1981 is no longer tenable. Here are the residents and local communities objections:

1. The revised plans are not in compliance with current planning ordinances and respecting current/future fire conditions, life safety, property safety and defensible space. There is no way that these grandfathered in laws from the early 1980's should be legally allowed to stand and be approved in 2025. Not only is the county not doing it's due diligence to protect current life and property, it is willfully creating a situation where further life and property from these future developments will be put at risk from future fire danger.

2. The County released its latest status on this project on January 8th, (the day after the beginning of the Palisades & Eaton fires) - it's recommendation that these plans should be approved literally during the worst wildfire in Los Angeles County. While that was happening all the current property owners in the adjacent properties and neighboring community were evacuated from their homes and without power thus giving them zero opportunity to submit a rebuttal to the County's just released plans.

3. The Community in proximity to this Development Permit appreciates that the County did allow a continuance of the hearing process, to allow time for residents to prepare their objections given recent life changing developments for All Angelenos:

a. These catastrophic fires have changed the game for the entire county.

b. To approve planning for 4 homes on this site, leaning on 1981 grandfathered zoning is tantamount to exposing all residents - both current and future - to willful endangerment.

It may be paper legal, but it is not morally legal. If 24/25 zoning were applied to this project, planning would rule for likely one dwelling, maybe two dwellings, and most certainly not three or recklessly four dwellings. Moreover, the applicant chooses to position one home (Lot 4) directly adjacent to two existing homes, dangerously adhering to the absolute minimum 10 ft from fence line, provided no practical defensible space while also stubbornly maintaining its footprint since inception.

c. This will be Los Angeles County Planning decision, you are responsible for its conclusion and carry with it the liability of your direction.

4. We approached the applicant as genuinely concerned neighbors and were told that economic considerations dictate quantity of units. Are we really going to be dictated solely by economic considerations here, when this very priority is what has led to Palisades in destruction, Alta Dena pummeled, Malibu fractured by 3 major fires in 6 years, 2 in 6 weeks. Economics or public safety?

5. Adding this development will kill insurance coverages for all residents both current and future.

6. In closing, the days of Angelenos acting in self-interest and neglecting the greater good of the community are over. They died in the destruction we all witnessed from the horrific fires and heartbreak for 1,000s of our fellow Angeleno citizens at the beginning of this year. We ask Los Angeles County supervisors to please uphold the spirit of the LCP, reduce the footprints of these homes, particularly LOT 4, for the safety of current and future residents. This is about public safety in all its attributes. Let this new precedent be set now for all future communities. You possess in equal measure the authority to act and the responsibility of your action's outcomes.

One final point, the hearings for the first appeal was scheduled for July 4th week and this current hearing/Appeal to LA County Supervisors is during Thanksgiving week -both weeks of national holidays and the largest weeks of travel in the US - As you can see we as a community feel extremely strongly about protecting our mountains and have forgone travel in order to be here as good citizens and advocate for the safety of our community which includes Mr. Zachary whether he realizes that or not. We as community members understand how much LA County supervisors have on their plate right now. It must be incredibly overwhelming dealing with so many of our fellow citizens and community members who have lost so much, some everything! That is why we are being so diligent in supporting this Las Virgenes Federations appeal because we as concerned citizens want to support LA County in making the right decision here. This is a precedent setting case in Zone 0 of the Santa Monica Mountains.

Sincerely,
Mairead Mac Mullan

From: [Joan Slimocosky](#)
To: [PublicComments](#)
Subject: Fwd: Public Hearing Project No.2019-000010-(3)
Date: Friday, November 21, 2025 1:58:05 PM

----- Forwarded message -----

From: **Walt Miller** <wedm2250@gmail.com>
Date: Tue, Nov 18, 2025 at 9:39 AM
Subject: Public Hearing Project No.2019-000010-(3)
To: <publichearing@bos.lacounty.gov>, Third District <ThirdDistrict@bos.lacounty.gov>

Minor Coastal Development Permit Nos.
RPPL201900016,RPPL201900017,RPPL201900018,RPPL201900019

Dear Regional Planning Commission and LA County Supervisors,

I've resided at 2250 Cold Canyon Road for the past 38 years. In the mid-80s, I was searching for a large property in the Santa Monica Mountains or North Malibu. After years of searching, I decided to take a break from my home search and called my realtor. Several months later, my good high school friends called me excitedly and informed me that they had found my dream home. Initially, I dismissed their enthusiasm, but they insisted that the property they were considering remodeling by the current owner was exactly what I had been looking for. They also mentioned that the owner was considering selling the property. They described the property as having the acreage I desired, ample yard space for my dogs to run, a sense of seclusion due to the large lots, and being surrounded by miles of canyon roads and State Park land perfect for mountain biking.

I purchased the property next to mine about 20 years ago because I love the sense of open space and the tranquility it offers, away from the hustle and bustle of the city. Growing up in Encino, I found solace in the Santa Monica Mountains. I would ride my bike with my friends and dogs, drive our mini pickups on the dirt Mulholland, and explore the range on mountain bikes.

I still have a deep passion for hiking the incredible trails and cycling the numerous canyons right out my front door. All my neighbors share this passion for the sense of space and beauty that surrounds us in the Cold Creek area. However, I am concerned about the potential impact of this development on our beloved community.

This area is prone to wildfires, and the canyon roads can become congested in the morning and afternoon due to rush-hour traffic and the Calabasas Schools along Mulholland. The Santa Ana winds exacerbate the situation, causing widespread anxiety among residents. I personally experienced the devastating Old Topanga Fire in 1993, which reached Calabasas Peak and ravaged the area all the way to the coast. Since then, there have been numerous fires that have left a lasting impact.

In my backyard, I encounter a diverse range of wildlife, including coyotes, bobcats, red foxes, skunks, raccoons, mountain lions, and now black bears. These mountains and canyons retain

their untamed nature, and it would be unfortunate to establish a new precedent by developing subdivisions along the picturesque and delicate Cold Creek watershed and Mulholland corridor.

I kindly request that you seriously consider the consequences of increasing the density of buildings in this designated building zone. Let us preserve this area as a safer, less densely populated place within a sensitive ecosystem and a high-fire zone that requires our attention and protection.

Sincerely,

Walter D. Miller

Homeowner

From: [Joan Slimocosky](#)
To: [PublicComments](#)
Subject: Fwd: Public hearing Project No.2019-000010-(3) Minor Coastal Development Permit Nos. RPPL201900016, RPPL201900017, RPPL201900018, RPPL201900019
Date: Friday, November 21, 2025 1:58:45 PM

----- Forwarded message -----

From: **Jennifer Mayer** <jmayersandoval@gmail.com>
Date: Thu, Nov 20, 2025 at 12:11 PM
Subject: Public hearing Project No.2019-000010-(3) Minor Coastal Development Permit Nos. RPPL201900016, RPPL201900017, RPPL201900018, RPPL201900019
To: <PublicHearing@bos.lacounty.gov>, <thirddistrict@bos.lacounty.gov>

To Whom It May Concern:

I am writing to support the appeal by The Las Virgenes Homeowners Federation regarding the 4 home proposal at the site of 24937 Mulholland Hwy. The support the Las Virgenes Federation reason for Appeal as follows:

LA County Code Section 22.44.1910.1 : with discretionary maximization in mind, County can require a smaller building site area to meet provisions of LIP, including:

- a. Protection of sensitive habitat (i.e. pristine designated cold creek watershed) and
- b. Avoidance of hazards (e.g. fire safety issues, especially on Lot 4)

In addition, I join the Las Virgenes Homeowners Federation concerns as follows:

- a. The original parceling of this Subdivision was in 1981 - with today's current planning rules most likely 1 maximum 2 homes would be granted. The developer therefore is working through an old outdated 45 year old ordinance.
- b. The Palisades Fire should have changed County Supervisors assessment on the density and size of buildings permitted on any lot in this rural subdivision.
- c. On March 24, 2025 the latest fire hazard severity maps for Los Angeles County, which include areas under both state and local responsibility, were released. The updated map shows an increase in the number of acres designated as fire hazard zones in Los Angeles County including a 30% increase in the highest severity category. All of our neighborhood homes and properties and the proposed new development are in the highest severity zone: Zone 0.
- d. We continue to express concern about this project meeting the California Environmental Quality Act threshold.
- e. We hold a view that the development contravenes the Malibu Local Coastal Program guidelines and spirit. The County has at its discretion the ability to reduce the building size for one, some or all four of these homes
- f. Water use and conservation. Bigger homes mean more water usage - larger septic tanks - more potential of water table contamination.
- g. ***Importantly this hearing will set precedence for ALL current and ALL future residents/developments in our area!*** We will not allow our severe fire zone location to become a Palisades like risk.

With anticipation for your careful consideration,

Jen Mayer
2222 Cold Canyon Road, Calabasas, CA

--

Jen Mayer
(323) 828-3860

From: [Joan Slimocosky](#)
To: [PublicComments](#)
Subject: Fwd: Support for LVHF Appeal – Project No. 2019-000010-(3), 24937 Mulholland Hwy
Date: Friday, November 21, 2025 1:59:34 PM

----- Forwarded message -----

From: Linda Yannetty <girlwboots@mac.com>
Date: Wed, Nov 19, 2025 at 9:05 PM
Subject: Support for LVHF Appeal – Project No. 2019-000010-(3), 24937 Mulholland Hwy
To: <PublicHearing@bos.lacounty.gov>, <thirddistrict@bos.lacounty.gov>

Dear Regional Planning Commission and Los Angeles County Supervisors,

I am writing as a concerned resident of the Mulholland Highway and Cold Creek area to express my support for the Las Virgenes Homeowners Federation's appeal regarding the proposed four-home development at 24937 Mulholland Highway (Project No. 2019-000010-(3), Minor CDP Nos. RPPL201900016–19). With the hearing set for Tuesday, November 25th, I respectfully ask that this project be reconsidered in light of the significant risk factors and environmental sensitivities within this corridor.

Grounds for Concern

The parcels for this subdivision were created in 1981 under outdated planning rules. Under today's standards, it is unlikely that more than one or two homes would be permitted on this land. Allowing four large homes based on a 45-year-old framework does not align with current safety, environmental, or zoning expectations.

The updated March 24, 2025 Fire Hazard Severity Maps show a 30% increase in acreage designated within the highest severity category. Our entire neighborhood — including the proposed development — is classified as Zone 0, the most extreme fire-risk zone. Having personally evacuated multiple times in recent years, I know how urgent and real this danger is.

There also remains considerable uncertainty regarding whether this project meets the CEQA threshold, especially concerning cumulative impacts, wildlife movement, hillside stability, and wildfire response safety. Additionally, the project appears to conflict with the spirit and intent of the Malibu Local Coastal Program, which allows for discretionary reductions in allowable building size when environmental protection and hazard mitigation warrant it.

Water use is another significant concern. Larger homes require larger septic systems and greater water consumption, increasing the potential for stress on our watershed and contamination of the water table. These impacts must be given thorough and transparent review.

Finally, the approval of this project sets a precedent with long-lasting consequences for all current and future residents. Decisions made in a Zone 0 community must prioritize fire safety, environmental stewardship, and responsible development above all else.

Request

For these reasons, I respectfully urge the County to:

- Uphold the LVHF appeal
- Reevaluate the project with full CEQA compliance
- Exercise discretionary authority to require reduced building sizes
- Prioritize community safety and environmental protection in this highly sensitive corridor

Closing

Thank you for your time and attention to this matter. This development is very close to me and directly north of my property. I have personally experienced multiple wildfire evacuations in recent years. My concern is not about limiting who can live here - it's about making sure that both current and future residents are protected with responsible planning, appropriate building size, and proper environmental review. This is a community I care deeply about, and I want it to be safe and sustainable for everyone who calls it home.

I appreciate your commitment to protecting both the residents and the long-term integrity of the Mulholland/Cold Creek region.

Warm regards,

Linda M Yannetty
2188 Cold Cyn Rd
Calabasas, CA 91302
(310) 913-8401

Liam Lynch
24879 Mulholland Highway
Calabasas, CA 91302

November 18, 2025

For Attention Of:

Los Angeles County, Executive Office of the Board of Supervisors
Board Services Division
Kenneth Hahn Hall of Administration
500 West Temple Street, Room 383
Los Angeles, CA 90012

Dear County Supervisors-

I am writing to you today as an interested party, and immediately effected neighbor of the above proposed development and in representation of our Mulholland scenic corridor to support the appeal by The Las Virgenes Homeowners Federation on all of our behalf in this community against the dense 4 home proposal at the site of 24937 Mulholland Hwy.

I am sure you have or will receive a staff briefing on this proposal, which has galvanized a community in their objection to the extent and building size areas for all four homes. In particular my family is deeply concerned about Lot 4 where the largest of the homes is proposed at over 4300 square foot structure and immediately adjacent to our fenceline and less than 60 feet from our home, in an area that is allocated as Zone 0 on the fire map, and where it is recommended that structures should not be closer than 100 feet. Hence this proposed development is creating grave concern around fire danger and neighborhood safety.

Following instructions from the lead planner in July 2024 to reduce the size of then LOTS 3 & 4 - a decision was made by the county to accept a reduction in the building area for LOT 3 - while perplexingly maintaining the same maximum foot print for LOT 4 - which is the closest to the immediately adjacent 2 neighboring properties(one of them our home) - and as I already explained a mere 60 feet from the current Existing Neighboring Home and only 10 feet from our property line fence.

We understand the developer decided to reduce the building size of LOT 3 for wildlife mitigation and Fire safety reasons. We would ask why this same principal was not applied to LOT 4 with respect to defensible space from even closer already existing properties and why would the County not insist that this would also be reduced in size and footprint. Admittedly this decision was made before our most recent worst fires in LA County history however the 100 foot recommendation was already in place. This is why we support the Federations appeal and are appealing to you to do the same.

Grounds For Our Objections

The Las Virgenes Federation reason for appeal is as follows:

LA County Code Section 22.44.1910.1: with discretionary maximization in mind, County can require a smaller building site area to meet provisions of LCP, including:

- a. Protection of sensitive habitat (i.e. pristine designated cold creek watershed) and
- b. Avoidance of hazards (e.g. fire safety issues, especially on Lot 4)

But there are many more reasons of course that we as a community are wary of this development. Here are some points:

- a. The original parceling of this Subdivision was in 1981 - with today's current planning rules most likely 1 maximum 2 homes would be granted. The developer therefore is working through an old outdated 45-year-old ordinance.
- b. The Palisades Fire has changed County Supervisors assessment on the density and size of buildings permitted on any lot in this rural subdivision. I have so appreciated Supervisor Horvath's views expressed in this area with the launch **Blue Ribbon Commission on Climate Action and Fire-Safe Recovery** and your public comment on the new world we all now are living in
- c. On March 24, 2025 the latest fire hazard severity maps for Los Angeles County, which include areas under both state and local responsibility, were released. The updated map shows an increase in the number of acres designated as fire hazard zones in Los Angeles County including a 30% increase in the highest severity category. All of our neighborhood homes and properties and the proposed new development are in the highest severity zone: Zone 0.
- d. We continue to express concern about this project meeting the California Environmental Quality Act threshold.
- e. We hold a view that the development may contravene the Malibu Local Coastal Program guidelines and spirit. The County has at its discretion the ability to reduce the building size for one, some or all four of these homes
- f. Water use and conservation. Bigger homes mean more water usage - larger septic tanks - more potential of water table contamination in the pristine cold creek watershed.
- g. Importantly this hearing will set precedence for ALL current and ALL future residents/developments in our area! We will not allow our severe fire zone location to become a Palisades like risk.

In Summary

We are asking for your support of the appeal as our esteemed County Supervisors in the protected Santa Monica Mountains corridor to use the County's discretion to reduce the home size and building size to mitigate against our enduring health and safety concerns. We encourage you to request a legitimate environmental impact study and to enforcing state law for optimizing defensible space and mitigating fire risk for current and all prospective new homeowners in our region. As a family that has now evacuated our home 4 times in the last 7 years and packed bags ready to go innumerable others, we cannot in good conscience not petition and plea to you our local Supervisor and fellow County Supervisors to please not permit a situation where people and property are put into real and explicit harm.

I am truly grateful for the attention you may give it and know the community is grateful too.

Sincerely

Liam Lynch

Liam Lynch
24879 Mulholland Highway
Calabasas, CA 91302

November 18, 2025

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Board Services Division
Kenneth Hahn Hall of Administration
500 West Temple Street, Room 383
Los Angeles, CA 90012

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I am sure you have or will receive a staff briefing on this proposal, which has galvanized a community in their objection to the extent and building size areas for all four homes. In particular my family is deeply concerned about Lot 4 where the largest of the homes is proposed at over 4300 square foot structure and immediately adjacent to our fenceline and less than 60 feet from our home, in an area that is allocated as Zone 0 on the fire map, and where it is recommended that structures should not be closer than 100 feet. Hence this proposed development is creating grave concern around fire danger and neighborhood safety.

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In Summary

We are asking for your support of the appeal as our esteemed County Supervisors in the protected Santa Monica Mountains corridor to use the County's discretion to reduce the home size and building size to mitigate against our enduring health and safety concerns. We encourage you to request a legitimate environmental impact study and to enforcing state law for optimizing defensible space and mitigating fire risk for current and all prospective new homeowners in our region. As a family that has now evacuated our home 4 times in the last 7 years and packed bags ready to go innumerable others, we cannot in good conscience not petition and plea to you our local Supervisor and fellow County Supervisors to please not permit a situation where people and property are put into real and explicit harm.

I am truly grateful for the attention you may give it and know the community is grateful too.

Sincerely

Liam Lynch

November 14, 2025

TO: Regional Planning Commission and LA County Supervisors
FROM: Michael & Christy Blodgett - 24885 Mulholland Hwy, Calabasas

We are submitting our appeal to the July 23rd Regional Planning Commission approval for Project Number 2019-00010 - especially LOT 4 (MINOR CDP NO. RPPL2019000019) . We hope you reconsider the approved project as it does not meet the CEQA threshold. As direct neighbors to the development, maintain grave concern that following instructions from the lead planner in July 2024 to reduce the size of then . LOTS 3 & 4 - a decision was made by the county to accept a reduction in the building area for LOT 3 - while maintaining the same maximum foot print for LOT 4 - immediately adjacent to our property and Lynch neighboring property. The small distance of **ONLY 50 feet** from our home and only **10 feet** from the Lynch property line fence. We realize the developer made a decision to reduce the building size of LOT 3 for wild life mitigation and fire safety reasons. We would expect this same guideline to be applied to LOT 4 with respect to defensible fire space from even closer already existing properties. The site developer and the county are placing current and potential future residents in extreme danger of imminent fire risk. This area has been allocated in the highest danger fire zone, ZONE 0, when the new maps were released on March 24th 2025. We are asking the County Board of Supervisors apply common sense to the planning approval and reconsider the July 23rd decision. As elected representatives of all the people in our district, please advocate for responsible and safe development - not development motivated by economics or profit alone. We submit this appeal with due respect to LA County Planning and to the developer.

Respectfully,


Michael & Christy Blodgett - 24885 Mulholland Hwy

NON-APPLICANT

Date 8/4/2025

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.: 2019-000010-(3)

APPLICANT: Las Virgenes Homeowners Fed., Inc.

LOCATION: 24937 Mulholland Hwy

Minor CDP(s) RPPL 2019000016, RPPL 2019000017, RPPL 2019000018,
RPPL 2019000019 EA # RPPL 2023 001199 Zoned Santa Monica
APN(s) 4455-019-044, 045, 046, 047 District: Coastal

Related zoning matters:

CUP(s) or VARIANCE No. _____

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: \$1,181*

☒ The Approval of this request: \$1,181* N/A SMMS Coastal Zone

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

Briefly, explain the reason for the appeal (attach additional information if necessary):

LA County ^{Code} Section 22.44.1910.1 With discretionary maximization in mind, County can require a smaller Building Site Area to meet provisions of LIP, including:

- 1) protection of sensitive habitat (i.e. pristine designated Cold Creek Watershed)
- and 2) avoidance of hazards (e.g. fire safety issues, especially on Lot 4 -WHF52)

Joan Slimocosky co-president LVHF
Roger Pugliese ROG co-president LVHF
(Signed) Appellant

Joan Slimocosky Roger Pugliese
Print Name

P.O. Box 353

Street Address

Agoura Hills, CA 91301

City/Zip

(818) 274-1638 (310) 455-2951

Day Time Telephone Number

jslimocosky@gmail.com emimoon@gmail.com
E-mail Address

From: [Walt Miller](#)
To: [PublicComments](#); [Third District](#)
Subject: Public Hearing Project No.2019-000010-(3)
Date: Friday, November 21, 2025 4:36:52 PM

Minor Coastal Development Permit Nos.
RPPL201900016,RPPL201900017,RPPL201900018,RPPL201900019

Dear Regional Planning Commission and LA County Supervisors,

I've resided at 2250 Cold Canyon Road for the past 38 years. In the mid-80s, I was searching for a large property in the Santa Monica Mountains or North Malibu. After years of searching, I decided to take a break from my home search and called my realtor. Several months later, my good high school friends called me excitedly and informed me that they had found my dream home. Initially, I dismissed their enthusiasm, but they insisted that the property they were considering remodeling by the current owner was exactly what I had been looking for. They also mentioned that the owner was considering selling the property. They described the property as having the acreage I desired, ample yard space for my dogs to run, a sense of seclusion due to the large lots, and being surrounded by miles of canyon roads and State Park land perfect for mountain biking.

I purchased the property next to mine about 20 years ago because I love the sense of open space and the tranquility it offers, away from the hustle and bustle of the city. Growing up in Encino, I found solace in the Santa Monica Mountains. I would ride my bike with my friends and dogs, drive our mini pickups on the dirt Mulholland, and explore the range on mountain bikes.

I still have a deep passion for hiking the incredible trails and cycling the numerous canyons right out my front door. All my neighbors share this passion for the sense of space and beauty that surrounds us in the Cold Creek area. However, I am concerned about the potential impact of this development on our beloved community.

This area is prone to wildfires, and the canyon roads can become congested in the morning and afternoon due to rush-hour traffic and the Calabasas Schools along Mulholland. The Santa Ana winds exacerbate the situation, causing widespread anxiety among residents. I personally experienced the devastating Old Topanga Fire in 1993, which reached Calabasas Peak and ravaged the area all the way to the coast. Since then, there have been numerous fires that have left a lasting impact.

In my backyard, I encounter a diverse range of wildlife, including coyotes, bobcats, red foxes, skunks, raccoons, mountain lions, and now black bears. These mountains and canyons retain their untamed nature, and it would be unfortunate to establish a new precedent by developing subdivisions along the picturesque and delicate Cold Creek watershed and Mulholland corridor.

I kindly request that you seriously consider the consequences of increasing the density of buildings in this designated building zone. Let us preserve this area as a safer, less densely populated place within a sensitive ecosystem and a high-fire zone that requires our attention and protection.

Sincerely,

Walter D. Miller

Homeowner

Mairead Mac Mullan
24879 Mulholland Highway
Calabasas, CA 91302

November 19, 2025

For Attention Of: Regional Planning Commission and LA County Supervisors,
Re: In response to the revised plans Project # 2019-000010-(3) for Parcel Map 10857 in 1981
Hearing Date: November 25, 2025

Dear Regional Planning Commission and LA County Supervisors,
I am writing today in support of The Las Virgenes Homeowners Federation Appeal to amend the planning granted to the 4 home subdivision proposal at the site of 24937 Mulholland Hwy. We have been working together diligently as a community to have LA County uphold the spirit of the LCP and keep the Santa Monica Mountains a home where the safety of wild life, wild land, people and property are the priorities of LA County and not the maximization of economic profit for developers at the expense of these basic rights.

Brief Summary:

The proposed planning application was first made known to the local community on April 22nd 2024 - when 4 sets of story poles were put up in the proposed location for these 4 homes. There had been no communication to neighbors from the developer pre that. Neighbors immediately put together a reasoned powerpoint objecting to particular aspects of the planning proposal. Los Angeles County Planning then created the following recommendations for the developer:

After taking a closer look at the project, we are recommending that the residences proposed for Lot 3 and Lot 4 be redesigned with smaller structural footprints and building site areas (BSA). This would reduce the overall impact of fuel modification on H2 Habitat for both of these lots. Several policies of the Santa Monica Mountains LCP Land Use Plan, as well as the Local Implementation Program, emphasize the importance of preserving H1 and H2 Habitat in its natural state, even if that means requiring less than the maximum allowed BSA and/or structural area. Reducing the size of the residences on Lot 1 and Lot 2 would not accomplish this, as the lots are smaller and contain much less H2 Habitat.

The developer then did reduce the footprint of the home furthest away from current residents however did not make any changes to the Lot size of parcel 4 and actually moved it closer to the residents that are to the left of this lot and created no change to the dangerous proximity to the property line of the residents that are directly adjacent to this proposed lot. Outside of the fact that the proposed 4 home lots would never be granted with current Los Angeles County planning requirements, in lieu of the recent frequent and extremely destructive wild fires in the Los Angeles county area across all regions - grandfathered in planning permission from 1981 is no longer tenable. Here are the residents and local communities objections:

1. The revised plans are not in compliance with current planning ordinances and respecting current/future fire conditions, life safety, property safety and defensible space. There is no way that these grandfathered in laws from the early 1980's should be legally allowed to stand and be approved in 2025. Not only is the county not doing it's due diligence to protect current life and property, it is willfully creating a situation where further life and property from these future developments will be put at risk from future fire danger.

2. The County released its latest status on this project on January 8th, (the day after the beginning of the Palisades & Eaton fires) - it's recommendation that these plans should be approved literally during the worst wildfire in Los Angeles County. While that was happening all the current property owners in the adjacent properties and neighboring community were evacuated from their homes and without power thus giving them zero opportunity to submit a rebuttal to the County's just released plans.

3. The Community in proximity to this Development Permit appreciates that the County did allow a continuance of the hearing process, to allow time for residents to prepare their objections given recent life changing developments for All Angelenos:

a. These catastrophic fires have changed the game for the entire county.

b. To approve planning for 4 homes on this site, leaning on 1981 grandfathered zoning is tantamount to exposing all residents - both current and future - to willful endangerment.

It may be paper legal, but it is not morally legal. If 24/25 zoning were applied to this project, planning would rule for likely one dwelling, maybe two dwellings, and most certainly not three or recklessly four dwellings. Moreover, the applicant chooses to position one home (Lot 4) directly adjacent to two existing homes, dangerously adhering to the absolute minimum 10 ft from fence line, provided no practical defensible space while also stubbornly maintaining its footprint since inception.

c. This will be Los Angeles County Planning decision, you are responsible for its conclusion and carry with it the liability of your direction.

4. We approached the applicant as genuinely concerned neighbors and were told that economic considerations dictate quantity of units. Are we really going to be dictated solely by economic considerations here, when this very priority is what has led to Palisades in destruction, Alta Dena pummeled, Malibu fractured by 3 major fires in 6 years, 2 in 6 weeks. Economics or public safety?

5. Adding this development will kill insurance coverages for all residents both current and future.

6. In closing, the days of Angelenos acting in self-interest and neglecting the greater good of the community are over. They died in the destruction we all witnessed from the horrific fires and heartbreak for 1,000s of our fellow Angeleno citizens at the beginning of this year. We ask Los Angeles County supervisors to please uphold the spirit of the LCP, reduce the footprints of these homes, particularly LOT 4, for the safety of current and future residents. This is about public safety in all its attributes. Let this new precedent be set now for all future communities. You possess in equal measure the authority to act and the responsibility of your action's outcomes.

One final point, the hearings for the first appeal was scheduled for July 4th week and this current hearing/Appeal to LA County Supervisors is during Thanksgiving week -both weeks of national holidays and the largest weeks of travel in the US - As you can see we as a community feel extremely strongly about protecting our mountains and have forgone travel in order to be here as good citizens and advocate for the safety of our community which includes Mr. Zachary whether he realizes that or not. We as community members understand how much LA County supervisors have on their plate right now. It must be incredibly overwhelming dealing with so many of our fellow citizens and community members who have lost so much, some everything! That is why we are being so diligent in supporting this Las Virgenes Federations appeal because we as concerned citizens want to support LA County in making the right decision here. This is a precedent setting case in Zone 0 of the Santa Monica Mountains.

Sincerely,
Mairead Mac Mullan

From: [Linda Yannetty](#)
To: [PublicComments](#)
Subject: Fwd: Support for LVHF Appeal – Project No. 2019-000010-(3), 24937 Mulholland Hwy
Date: Friday, November 21, 2025 5:26:45 PM

Sent with love from the clouds

Begin forwarded message:

From: Linda Yannetty <girlwboots@mac.com>
Date: November 19, 2025 at 9:05:34 PM PST
To: PublicHearing@bos.lacounty.gov, thirddistrict@bos.lacounty.gov
Subject: Support for LVHF Appeal – Project No. 2019-000010-(3), 24937 Mulholland Hwy

Dear Regional Planning Commission and Los Angeles County Supervisors,

I am writing as a concerned resident of the Mulholland Highway and Cold Creek area to express my support for the Las Virgenes Homeowners Federation's appeal regarding the proposed four-home development at 24937 Mulholland Highway (Project No. 2019-000010-(3), Minor CDP Nos. RPPL201900016–19). With the hearing set for Tuesday, November 25th, I respectfully ask that this project be reconsidered in light of the significant risk factors and environmental sensitivities within this corridor.

Grounds for Concern

The parcels for this subdivision were created in 1981 under outdated planning rules. Under today's standards, it is unlikely that more than one or two homes would be permitted on this land. Allowing four large homes based on a 45-year-old framework does not align with current safety, environmental, or zoning expectations.

The updated March 24, 2025 Fire Hazard Severity Maps show a 30% increase in acreage designated within the highest severity category. Our entire neighborhood — including the proposed development — is classified as Zone 0, the most extreme fire-risk zone. Having personally evacuated multiple times in recent years, I know how urgent and real this danger is.

There also remains considerable uncertainty regarding whether this project meets the CEQA threshold, especially concerning cumulative impacts, wildlife movement, hillside stability, and wildfire response safety. Additionally, the project appears to conflict with the spirit and intent of the Malibu Local Coastal Program, which allows for discretionary reductions in allowable building size when environmental protection and hazard mitigation warrant it.

Water use is another significant concern. Larger homes require larger septic systems and greater water consumption, increasing the potential for stress on our watershed and contamination of the water table. These impacts must be given thorough and transparent review.

Finally, the approval of this project sets a precedent with long-lasting consequences for all current and future residents. Decisions made in a Zone 0 community must prioritize fire safety, environmental stewardship, and responsible development above all else.

Request

For these reasons, I respectfully urge the County to:

- Uphold the LVHF appeal
- Reevaluate the project with full CEQA compliance
- Exercise discretionary authority to require reduced building sizes
- Prioritize community safety and environmental protection in this highly sensitive corridor

Closing

Thank you for your time and attention to this matter. This development is very close to me and directly north of my property. I have personally experienced multiple wildfire evacuations in recent years. My concern is not about limiting who can live here - it's about making sure that both current and future residents are protected with responsible planning, appropriate building size, and proper environmental review. This is a community I care deeply about, and I want it to be safe and sustainable for everyone who calls it home.

I appreciate your commitment to protecting both the residents and the long-term integrity of the Mulholland/Cold Creek region.

Warm regards,

Linda M Yannetty
2188 Cold Cyn Rd
Calabasas, CA 91302
(310) 913-8401

From: [Van Whiting](#)
To: [PublicComments](#)
Subject: Public Hearing Project No.2019-000010-(3) Minor Coastal Development Permit Nos. RPPL201900016, RPPL201900017, RPPL201900018, RPPL201900019
Date: Sunday, November 23, 2025 10:51:03 AM

**Re: Public Hearing Project No.2019-000010-(3) Minor Coastal Development Permit Nos.
RPPL201900016, RPPL201900017, RPPL201900018, RPPL201900019
Hearing Date: Tuesday, November 25 at 9:30 a.m.**

Dear Regional Planning Commission and Los Angeles County Supervisors,

I write in support of the appeal submitted by the Las Virgenes Federation regarding the proposed four-home development at 24937 Mulholland Highway (Parcel Map 10857). I respectfully ask that the proposed project be reevaluated and full consideration be given to current fire-safety realities, environmental protections, and the spirit and intent of the Malibu Local Coastal Program.

The proposed subdivision relies on a 1981 ordinance and related entitlements that do not take into account modern planning standards, current environmental science, and fire-risk data. Under today's standards, it is unlikely that more than one or two homes would be approved on this terrain. Proceeding with four full-scale homes based on outdated rules does not align with contemporary safety obligations that I believe must take precedence.

This area is now mapped in the highest-risk fire designation, Zone 0, under the updated March 24, 2025 Fire Hazard Severity Zones. The Palisades Fire and the Eaton Fire highlight the severe risks of building density and lack of defensible space in high-risk wildland areas like ours. Larger structures, expanded fuel loads, and reduced defensible space, all of which would result from the proposal as it stands, significantly increase the threat to existing homeowners and future residents.

I also have significant environmental questions about the proposed development. In an ecologically sensitive area like ours, protecting wildland habitats and rural character are important. The National Parks Service (<https://home.nps.gov/samo/learn/nature/index.htm>) estimates that the Santa Monica Mountains harbor over 1,000 native plant species and comprise 26 natural communities that support approximately 400 bird species and 35 reptile and amphibian species. This property sits near the UCLA Stunt Ranch Reserve (<https://communitypartnerships.ucla.edu/program/ucla-stunt-ranch-santa-monica-mountains-reserve/>) in an area that UCLA has highlighted as being not only rich in biodiversity and comprising a variety of ecosystems, but where evidence of extensive early human habitation has been recovered. I urge the County to use caution when considering additional density in such a unique and environmentally and archeologically significant area.

This hearing will set precedent. Decisions made here will determine the trajectory of future development across our entire community. I urge the County to exercise its

discretion under Code Section 22.44.1910.1 to reduce buildable areas where needed to protect sensitive habitat and minimize hazard exposure. For this parcel, that discretion is not only available but necessary.

As someone who has faced wildfire evacuations with my family, and seen my daughter's school burn in the Palisades Fire, I have experienced firsthand the consequences of dense building in extreme-risk zones. I urge the County to prioritize safety and responsible planning over legacy entitlements and economic pressure.

Thank you for your attention to this matter and for your continued stewardship of our unique and vulnerable region.

Sincerely,

Van Whiting

24875 Mulholland Hwy

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Van Whiting

(323)-333-1227

van.whiting@gmail.com

From: [Melissa Whiting](#)
To: [PublicComments](#)
Subject: Public Hearing Project No.2019-000010-(3) Minor Coastal Development Permit Nos. RPPL201900016, RPPL201900017, RPPL201900018, RPPL201900019
Date: Sunday, November 23, 2025 7:52:54 PM

**Re: Public Hearing Project No.2019-000010-(3) Minor Coastal Development Permit Nos.
RPPL201900016, RPPL201900017, RPPL201900018, RPPL201900019
Hearing Date: Tuesday, November 25 at 9:30 a.m.**

Dear Regional Planning Commission and Los Angeles County Supervisors,

I am submitting this letter in support of the Las Virgenes Federation's appeal concerning the proposed four-home development at 24937 Mulholland Highway. As a resident and parent in this community, I am deeply concerned that the approved project does not adequately reflect current fire-risk conditions, environmental protections, or responsible land-use planning.

This subdivision was originally configured in 1981. The planning assumptions underlying that map no longer align with modern fire-science, ecological standards, or the County's own more recent policies. Today's updated Fire Hazard Severity Zones—released March 24, 2025—identify our neighborhood as Zone 0, the highest level of danger. Given this, the density, scale, and placement of the proposed homes raise serious safety issues for current and future residents.

Our family has evacuated multiple times in recent years, and each event has underscored how critical defensible space and low structural density are in severe wildfire terrain. During the Palisades Fire, my daughter's school (Seven Arrows Elementary) in the Palisades was burned and many of her friends lost their homes. The proposed development, particularly as currently configured, places additional homes and families in a location where evacuation routes are limited and fuel loads are high and puts both our family and other residents at greater risk. The County's discretion to reduce buildable areas should be exercised here to protect life and property.

This hearing will influence development expectations for our entire rural canyon community. I ask that the County approach it with the highest degree of caution and prioritize safety, environmental integrity, and long-term resilience.

Thank you for considering these concerns and for your continued responsibility in protecting both residents and the natural landscape that makes this region so special.

Sincerely,

Melissa Whiting

24875 Mulholland Hwy

**JOAN ERWIN
24871 MULHOLLAND HWY
CALABASAS, CA 91302**

November 23, 2025

Attention: Regional Planning Commission and L.A. County Supervisors

RE: In Response to revised plans Project 2019-000010-(3) for Parcel Map 10857
Hearing Date: November 25, 2025
Public Hearing Project No. 2019-000010-(3) Minor Coastal Development Permit
Nos. RPPL201900016, RPPL201900017, RPPL201900018, RPPL20201900019

Dear Regional Planning Commission and LA County Supervisors,

As well you know, Mulholland is not just a road, but one with a rich history traversing from the Hollywood hills through the Santa Monica Mountains to PCH at Leo Carrillo beach. It has been a part of most Angelenos history at one time or another, and certainly mine.

I grew up in Encino where Mulholland turned into a dirt road just above and west of it. Even so, passable with a four wheel jeep if you were willing. I always was; albeit, in the 1990s, portions of Mulholland were permanently closed to motor vehicle traffic in order to protect and preserve the natural beauty and wilderness of the area. Someone had the right idea.

Twenty-three years ago, I bought a home on Mulholland west of Topanga, thirty years past my four wheeling days on the same route, and not too much had changed. There were new houses built, but none on top of each other; and of the residents and neighbors I've been fortunate enough to meet or know over decades, appear to have a common love for and appreciation of the natural beauty that surrounds Mulholland, one of the more scenic roads in all of the United States.

My home is fifty years old, but no one is proposing a moratorium on building, just a little respect for Mulholland's natural beauty, and its open space embraced by most who have had the luxury to experience to know and enjoy Mulholland.

Times change, a lot since the original permit/plans upon which Applicants rely; floods, fire, and an ever growing influx of the population therein. Care must be taken to preserve the attraction, all it has to offer, and the proper respect to do just that.

Thanking you in advance for your time and consideration.

Sincerely,
Joan Erwin

Joan Erwin

November 14, 2025

TO: Regional Planning Commission and LA County Supervisors
FROM: Michael & Christy Blodgett - 24885 Mulholland Hwy, Calabasas

We are submitting our appeal to the July 23rd Regional Planning Commission approval for Project Number 2019-00010 - especially LOT 4 (MINOR CDP NO. RPPL2019000019) . We hope you reconsider the approved project as it does not meet the CEQA threshold. As direct neighbors to the development, maintain grave concern that following instructions from the lead planner in July 2024 to reduce the size of then . LOTS 3 & 4 - a decision was made by the county to accept a reduction in the building area for LOT 3 - while maintaining the same maximum foot print for LOT 4 - immediately adjacent to our property and Lynch neighboring property. The small distance of **ONLY 50 feet** from our home and only **10 feet** from the Lynch property line fence. We realize the developer made a decision to reduce the building size of LOT 3 for wild life mitigation and fire safety reasons. We would expect this same guideline to be applied to LOT 4 with respect to defensible fire space from even closer already existing properties. The site developer and the county are placing current and potential future residents in extreme danger of imminent fire risk. This area has been allocated in the highest danger fire zone, ZONE 0, when the new maps were released on March 24th 2025. We are asking the County Board of Supervisors apply common sense to the planning approval and reconsider the July 23rd decision. As elected representatives of all the people in our district, please advocate for responsible and safe development - not development motivated by economics or profit alone. We submit this appeal with due respect to LA County Planning and to the developer.

Respectfully,



Michael & Christy Blodgett - 24885 Mulholland Hwy

NON-APPLICANT

Date 8/4/2025

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.: 2019-000010-(3)

APPLICANT: Las Virgenes Homeowners Fed., Inc.

LOCATION: 24937 Mulholland Hwy

Minor CDP(s) RPPL 2019000016, RPPL 2019000017, RPPL 2019000018,
RPPL 2019000019 EA # RPPL 2023 001199 Zoned Santa Monica
APN(s) 4455-019-044, 045, 046, 047 District: Coastal

Related zoning matters:

CUP(s) or VARIANCE No. _____

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: \$1,181*

☒ The Approval of this request: \$1,181* N/A SMMS Coastal Zone

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

Briefly, explain the reason for the appeal (attach additional information if necessary):

LA County ^{Code} Section 22.44.1910.1 With discretionary maximization in mind, County can require a smaller Building Site Area to meet provisions of LIP, including:

- 1) protection of sensitive habitat (i.e. pristine designated Cold Creek Watershed)
- and 2) avoidance of hazards (e.g. fire safety issues, especially on Lot 4 -WHF52)

Joan Slimocosky co-president LVHF
Roger Pugliese ROG co-president LVHF
(Signed) Appellant

Joan Slimocosky Roger Pugliese
Print Name

P.O. Box 353
Street Address

Agoura Hills, CA 91301
City/Zip

(818) 274-1638 (310) 455-2951
Day Time Telephone Number

jslimocosky@gmail.com emimoon@gmail.com
E-mail Address

November 21, 2025

Holly Arias Gray, President
Cold Creek Community Council
P. O. Box 8066
Calabasas, California, 91302
hollyariasgray@icloud.com
270.210.7957

Los Angeles County Board of Supervisors
Kenneth Hahn Hall of Administration
500 W. Temple Street, Room 381B
Los Angeles, CA 90012

Re: Agenda Item 3 PROJECT NO. 2019-000010-(3): MINOR COASTAL DEVELOPMENT
PERMIT NOS. RPPL2019000016, RPPL2019000017, RPPL2019000018, RPPL2019000019

Honorable Supervisors:

The Cold Creek Community Council, in whose area the proposed development lies, respectfully offers the following comments on the above project for your consideration.

The Cold Creek watershed is widely recognized by scientists and planners for having the best water quality and greatest biological diversity of any in the Santa Monica Mountains. The Santa Monica Mountains Local Coastal Program (LCP) was specifically tailored to protect these very resources. Its creation and certification, after years of participation by residents and other stakeholders, has been proudly praised by Los Angeles County Supervisors, past and present, as one of the County's greatest accomplishments.

A guiding principle of the LCP is the favoring of resource protection over development. The Local Implementation Plan (LIP) of the LCP reinforces this principle by allowing a smaller Building Site Area (BSA) than the maximum allowable in order to meet other provisions of the LIP, such as protection of sensitive habitat and avoidance of hazards (County Code Section 22.44.1910.1).

The project at issue has reached your review without the application of this resource protection principle. The four proposed developments are the result of a subdivision that preexisted the LCP and that would never be permitted under its provisions today. All four lots have progressed through the planning process at the maximum allowable BSA and height. Lot 4 directly abuts a channel that drains into Cold Creek just a short distance away.

Approval of the maximum BSA and height for all of the four lots is discretionary. The County has the option to reduce the impacts to the downstream watershed resources by reducing the size of these developments, particularly Lot 4, while still recognizing the right of the property owner to reasonable use of the properties. We stand in support of the appeal of the Las Virgenes Homeowners Federation and urge you to send this project back to the Planning Department for adjustments to meet the resource protection mandates of the LCP.

Thank you for the consideration of our comments.

A handwritten signature in black ink, appearing to read 'Holly Arias Gray', with a stylized flourish at the end.

Holly Arias Gray, President
Cold Creek Community Council



November 24, 2025

VIA EMAIL AND ONLINE SUBMISSION

Board of Supervisors
Los Angeles County
Email: ctalamantes@bos.lacounty.gov

RE: 24937 Mulholland Highway
Agenda Item 3., Project No. 2019-000010-(3)

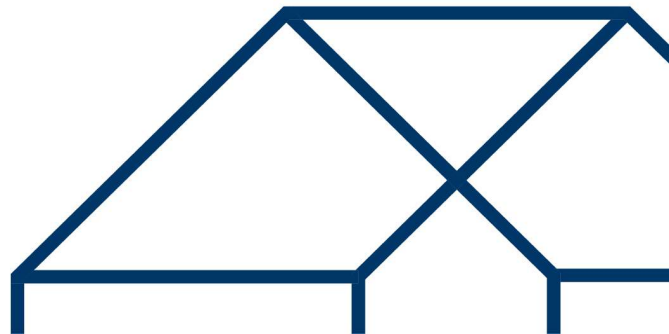
To the Board of Supervisors:

Californians for Homeownership is a 501(c)(3) organization devoted to using legal tools to address California's housing crisis. We are writing regarding Project No. 2019-000010-(3). The County has exceeded the five hearings permitted for this project under Government Code section 65905.5, and as a result, you are legally required to reject the appeal before you. The County's approval of this project is also required by the Housing Accountability Act, Government Code Section 65589.5. For the purposes of Government Code Section 65589.5(k)(2), this letter constitutes our written comments on the project.

The Housing Accountability Act generally requires the County to approve a housing development project unless the project fails to comply with "applicable, objective general plan, zoning, and subdivision standards and criteria, including design review standards, in effect at the time that the application was deemed complete." Gov. Code § 65589.5(j)(1). To count as "objective," a standard must "involve[e] no personal or subjective judgment by a public official and be[] uniformly verifiable by reference to an external and uniform benchmark or criterion available and knowable by both the development applicant or proponent and the public official." Gov. Code § 65589.5(h)(8). In making this determination, the County must approve the project if the evidence "would allow a reasonable person to conclude" that the project met the relevant standard. Gov. Code § 65589.5(f)(4). Projects subject to modified standards pursuant to a density bonus are judged against the County's standards as modified. Gov. Code § 65589.5(j)(3).

The County is subject to strict timing requirements under the Act. If the County desires to find that a project is inconsistent with any of its land use standards, it must issue written findings to that effect within 30 to 60 days after the application to develop the project is determined to be complete. Gov. Code § 65589.5(j)(2)(A). If the County fails to do so, the project is deemed consistent with those standards. Gov. Code § 65589.5(j)(2)(B).

If the County determines that a project is consistent with its objective standards, or a project is deemed consistent with such standards, but the County nevertheless proposes to reject it, it must



make written findings, supported by a preponderance of the evidence, that the project would have a “specific, adverse impact upon the public health or safety,” meaning that the project would have “a significant, quantifiable, direct, and unavoidable impact, based on objective, identified written public health or safety standards, policies, or conditions as they existed on the date the application was deemed complete.” Gov. Code § 65589.5(j)(1)(A); *see* Gov. Code § 65589.5(k)(1)(A)(i)(II). Once again, “objective” means “involving no personal or subjective judgment by a public official and being uniformly verifiable by reference to an external and uniform benchmark or criterion available and knowable by both the development applicant or proponent and the public official.” Gov. Code § 65589.5(h)(8).

Even if the County identifies legally sufficient health and safety concerns about a project, it may only reject the project if “[t]here is no feasible method to satisfactorily mitigate or avoid the adverse impact . . . other than the disapproval of the housing development project” Gov. Code § 65589.5(j)(1)(B). Thus, before rejecting a project, the County must consider all reasonable measures that could be used to mitigate the impact at issue.

These provisions apply to the full range of housing types, including single-family homes, market-rate multifamily projects, and mixed-use developments. Gov. Code § 65589.5(h)(2); *see Honchariw v. Cty. of Stanislaus*, 200 Cal. App. 4th 1066, 1074-76 (2011). And the Legislature has directed that the Act be “interpreted and implemented in a manner to afford the fullest possible weight to the interest of, and the approval and provision of, housing.” Gov. Code § 65589.5(a)(2)(L).

When a locality rejects or downsizes a housing development project without complying with the rules described above, the action may be challenged in court in a writ under Code of Civil Procedure Section 1094.5. Gov. Code § 65589.5(m). The legislature has significantly reformed this process over the last few years in an effort to increase compliance. Today, the law provides a private right of action to non-profit organizations like Californians for Homeownership. Gov. Code § 65589.5(k). A non-profit organization can sue without the involvement or approval of the project applicant, to protect the public’s interest in the development of new housing. A locality that is sued to enforce Section 65589.5 must prepare the administrative record itself, at its own expense, within 30 days after service of the petition. Gov. Code § 65589.5(m). And if an enforcement lawsuit brought by a non-profit organization is successful, the locality must pay the organization’s attorneys’ fees. Gov. Code § 65589.5(k)(2). In certain cases, the court will also impose fines that start at \$10,000 per proposed housing unit. Gov. Code § 65589.5(k)(1)(B)(i).

In recent years, there have been a number of successful lawsuits to enforce these rules:

- In *Eden Housing, Inc. v. Town of Los Gatos*, Santa Clara County Superior Court Case No. 16CV300733, the court determined that Los Gatos had improperly denied a subdivision application based on subjective factors. The court found that the factors cited by the town, such as the quality of the site design, the unit mix, and the anticipated cost of the units, were not objective because they did not refer to specific, mandatory criteria to which the applicant could conform.

- *San Francisco Bay Area Renters Federation v. Berkeley City Council*, Alameda County Superior Court Case No. RG16834448, was the final in a series of cases relating to Berkeley's denial of an application to build three single family homes and its pretextual denial of a demolition permit to enable the project. The Court ordered the city to approve the project and to pay \$44,000 in attorneys' fees.
- In *40 Main Street Offices v. City of Los Altos*, Santa Clara County Superior Court Consolidated Case Nos. 19CV349845 & 19CV350422, the court determined that the Los Altos violated the Housing Accountability Act, among other state housing laws, by failing to identify objective land use criteria to justify denying a mixed-use residential and commercial project. The City was ultimately forced to pay approximately \$1 million in delay compensation and attorneys' fees in the case.
- In *Californians for Homeownership v. City of Huntington Beach*, Orange County Superior Court Case No. 30-2019-01107760-CU-WM-CJC, a case brought by our organization, the court ruled that Huntington Beach violated the Housing Accountability Act when it rejected a 48-unit condominium project based on vague concerns about health and safety, including traffic concerns similar to those raised by comments on the project you are considering. Following the decision, the City agreed to pay \$600,000 in attorneys' fees to our organization and two other plaintiffs.

Based on the above legal framework, state law requires the County to approve this project. We have also considered the County's environmental review for the project and determined that it complied with state law. We urge you to approve the project.

Sincerely,



Matthew Gelfand

Talamantes, Cristina

From: Joan Slimocosky <jslimocosky@gmail.com>
Sent: Monday, November 24, 2025 5:03 PM
To: PublicComments
Subject: Re: Please submit correspondence on <https://publiccomment.bos.lacounty.gov/>

Dear Executive Secretary:

We have just learned from Supervisor Horvath's deputy that there is a question of recusal by our Third District Supervisor for tomorrow's BOS hearing on agenda item #3. At this unbelievable late notification, we are urging the postponement of Project No. 2019-000010-3 until this issue is resolved. After nearly 5 years of research and advocacy on this critical project in our community, we believe we are owed the courtesy of a postponement because of this truly insulting notification.

Joan Slimocosky, co president LVHF

On Fri, Nov 21, 2025 at 2:27 PM PublicComments <PublicComments@bos.lacounty.gov> wrote:

Thank you for your interest in submitting correspondence. Please submit your correspondence and/or attachments through our official online form at <https://publiccomment.bos.lacounty.gov/> to ensure it is included as part of the Board meeting's official record.

Please feel free to contact us at (213) 974-1442 with any questions.