

March 17, 2025

Holly Arias Gray, President (Non-Applicant)
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County of Los Angeles Department of Regional Planning
320 W Temple St
Los Angeles, CA 90012
comment@planning.lacounty.gov

Re: Agenda Item
Project 2019-000010: Minor Coastal Development Permit Nos.
RPPL2019000016, RPPL2019000017, RPPL2019000018, RPPL2019000019

Dear Hearing Officer:

The Cold Creek Community Council, in whose area the proposed development lies, offers the following comments on the above project for your consideration. We preface our comments by noting the noncompliance with Local Implementation Plan (LIP) section 22.44.970 that requires the “posting of a sign not less than 30 days prior to a public hearing on each public road frontage.” (See the attached photo, taken March 16, 2025.) The LIP further requires that the applicant provide the planning director with a photo and signed affidavit indicating compliance with this requirement.

We have reviewed the developer's proposed project modifications in response to our previous letter. While we appreciate the resulting lessening of impact to H2 habitat, additional modifications to the project would promote greater public safety and more closely align with the goals of the Santa Monica Mountains Local Coastal Plan (LCP).

The subdivision of the subject property occurred in 1981, resulting in the four lots now proposed for development. Subsequently, the LCP was certified, which would now permit the development of only one dwelling unit on the property. The LCP is widely recognized as a visionary document that provides for the development of properties within its jurisdiction under guidelines that preserve the valuable environmental and scenic qualities of the Coastal Zone.

The Los Angeles County Planning staff has conducted its analysis of the proposed project as though it were in conformance with the density allowed under the LCP. This project should instead be held to more stringent standards, given the extensive analysis and community participation that created the LCP.

The project proposes to develop four lots that maximize the allowable Building Site Area (BSA) of 10,000 square feet, resulting in structures at the maximum permissible height of 18 feet. The Local Implementation Plan (LIP) of the LCP can require a smaller BSA to meet other provisions of the LIP, including protection of sensitive habitat and avoidance of hazards (County Code Section 22.44.1910.1).

As has become evident from the recent Palisades Fire, houses themselves are fuel for wildfires, spreading fire from one house to adjacent ones. The plan for lot 4 shows the proposed structure only ten feet from the adjacent property line. This provides only a very narrow area for firefighters to defend the structure.

The proposed structure is only approximately 70 feet away from the house on the adjacent property, well within the 100 foot zone that is considered a minimum distance that is to be kept clear of large flammable material. Therefore, the design of lot 4 endangers both the proposed structure and the adjacent house in the event of a wildfire.

Lot 4 also shows development that encroaches on a mapped flood zone. Yet there is no analysis or finding in the hearing documents that address this, as is required by section 22.44.2101 of the County Code.

It is within the scope of the County's authority to reduce the allowable BSA of a project to less than the maximum. In the case of this project, this would limit grading, minimize impervious surfaces, reduce impacts to H2 habitat, and provide for a greater margin of safety for future residents of the site and their neighbors.

Thank you for considering our comments.

A handwritten signature in black ink, reading "Holly Arias Gray". The signature is fluid and cursive, with the first letters of each name being capitalized and prominent.

Holly Arias Gray
Cold Creek Community Council, President

Attachment:

