

SUPPLEMENTAL REPORT TO THE REGIONAL PLANNING COMMISSION

DATE ISSUED:	July 22, 2025	
HEARING DATE:	July 23, 2025	AGENDA ITEM: 8
PROJECT NUMBER:	2019-000010	
PERMIT NUMBER(S):	Minor Coastal Development Permit ("Minor CDP") Nos. RPPL2019000016, RPPL2019000017, RPPL2019000018, RPPL2019000019 Environmental Assessment No. RPPL2023001199	
SUPERVISORIAL DISTRICT:	3	
PROJECT LOCATION:	24937 Mulholland Highway, Calabasas	
OWNER:	Green Hills Associates, Inc.	
APPLICANT:	Isaac Zachary	
APPELLANT:	Las Virgenes Homeowners Federation	
PUBLIC MEETINGS HELD:	9 OF 5	
INCLUSIONARY ZONING ORDINANCE (IZO):	The Project is not subject to the IZO because it was deemed complete prior to the effective date of the IZO	
CASE PLANNER:	Tyler Montgomery, Principal Regional Planner TMontgomery@planning.lacounty.gov	

This agenda item is a request to construct four new single-family residences on four lots, which were created by Parcel Map 10857 in 1981 ("Project"). On July 22, 2025, LA County Planning staff ("Staff") received three letters.

The first letter, from Elisa Paster, an attorney representing the applicant (attached as Exhibit A-1), states that the County is already in violation of the Housing Accountability Act's five-hearing rule, as nine hearings have already occurred. It also asserts that the Project is consistent with the goals and policies of the current Santa Monica Mountains Local Coastal Program ("LCP"), as well as the development standards of the Santa Monica Mountains Local Implementation Program. Specifically, it states that the Project would be in character with the surrounding community, would be more fire resistant than nearby development, and would

not negatively affect wildlife movement. It also states that the residence proposed for Lot 4 would meet all required setbacks and cannot feasibly be moved further east.

The second letter, from Joan Slimocosky, the co-president of the Las Virgenes Homeowners Federation ("LVHF") (attached as Exhibit B-1), provides the reasons why the LVHF opposes the Project. It objects to the four residences maximizing the allowed building site areas of 10,000 square feet for each lot. It also objects to the cumulative effect of the Project on biological resources, stating that the LCP requires resource conservation to be favored over development.

The third letter, from Mairead MacMullan, a neighboring property owner (attached as Exhibit C-1), asserts that the Project cannot be approved. It states that the Project would conflict with California Public Resources Code ("PRC") Section 4291, which requires that a minimum 100-foot radius of defensible space be maintained around all buildings or structures, and the proposed residence on Lot 4 is less than 100 feet from her residence to the east. Staff would like to note that "defensible space" refers to fuel modification of flammable materials around buildings or structures – not to other structures themselves – and that this requirement does not extend beyond the boundary of any subject property (PRC Section 4291 and California Code of Regulations Section 1299.03).

If you have any questions or need additional information, please contact Tyler Montgomery of the Coastal Development Services Section at tmontgomery@planning.lacounty.gov.

Report

Reviewed By:

Rob Glaser

Robert Glaser, Supervising Regional Planner

Report

Approved By:

M. Glaser

Mitch Glaser, Assistant Administrator

LIST OF ATTACHED EXHIBITS	
EXHIBIT A-1	Letter from Elisa Paster (7/22/25)
EXHIBIT B-1	Letter from Joan Slimocosky (7/22/25)
EXHIBIT C-1	Letter from Mairead MacMullan (7/22/25)



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Elisa Paster
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July 22, 2025

VIA EMAIL

LA County Regional Planning Commission
c/o Tyler Montgomery, AICP
Principal Planner, Coastal Development Services
tmontgomery@planning.lacounty.gov

Re: Letter to Regional Planning Commission-Appeal of the Hearing Officer's approval of May 6, 2025-Project No. 2019-000010-(3)

Dear Chair Louie and Members of the Commission:

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 LA County Regional Planning Commission is scheduled to hear the appeal of the Hearing Officer's approval for the Project at the scheduled public hearing on July 23, 2025. That hearing will be a separate and independent violation of the Housing Accountability Act's ("HAA") five-hearing rule, just as the Hearing Officer hearing was a separate and independent violation of the HAA. On that basis, alone, the pending appeal should be denied. Applicant reserves all of its rights and remedies under applicable law relating to that issue.

Even if the County were not in violation of the HAA, we urge the Regional Planning Commission to deny the pending appeal ("Appeal") filed by the Las Virgenes Homeowners Federation 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, over the last five years that the Project has been pending, the Applicant has bent over backwards to respond to changing staff direction and neighborhood input, making meaningful modifications to the Project. 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 a year ago, and more than four 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, **nine 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 continuances 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 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

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#.

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

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.

Further, 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 as provided in our previous responses to neighborhood groups and Appellant (attached as Attachment B), in which the Applicant prepared a study area map confirming the Projects four sites having 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.

APN-Lot	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

b. 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 residences 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.

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.

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.

c. 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.

d. 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.

e. 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 polices 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.

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

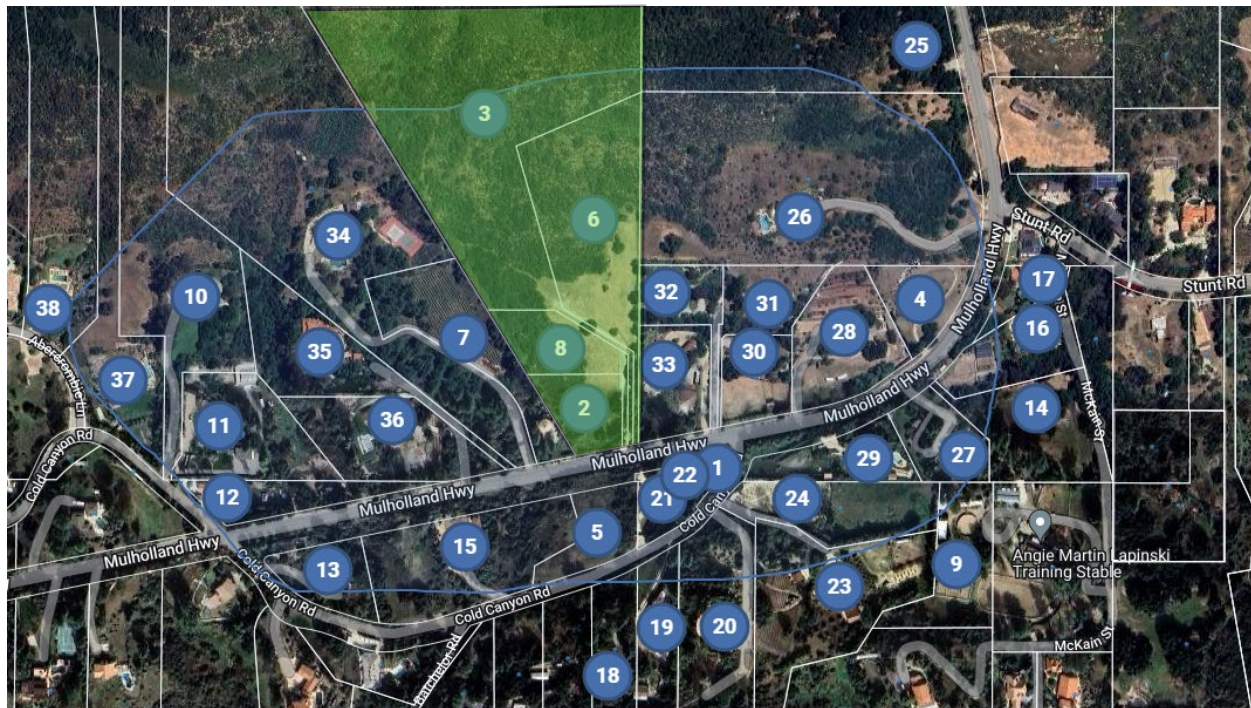


Table of Residential Building Area Square Footage

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

July 21, 2025

Los Angeles County Regional Planning Commission
Hall of Records
320 W. Temple Street, Room 150
Los Angeles, CA 90012

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

Honorable Commissioners:

The Las Virgenes Homeowners Federation appeals the approval of this project, as proposed, by the DRP Hearing Officer on May 6, 2025. The project proposes to develop 4 lots that maximize the allowable building site area of 10,000 square feet, a maximization that applies only to parcels with NO constraints. This subdivision has constraints duly noted in the numerous letters submitted to planning staff.

Overarching this totally discretionary maximization, approved by County Planning, is the precedent setting idea of a new subdivision in the Santa Monica Mountains. This subdivision, now conveniently morphed into four (4) single-family residences makes a mockery of everything the LCP requires, the preserving of resources in the coastal zone. Those of us who have worked so long and hard for the certification of the LCP refuse to stand by and see it be continuously “chipped away at”.

We urge you to review the LCP once again, especially the mandate of **Resource conservation over development**. We request you require County Planning to use their discretionary ability to look again at the cumulative effect on biological resources in the mountains and specifically the impact on these resources in our Very High Fire Hazard Severity Zone post January 2025.

The balance has shifted. **Support/ Uphold our appeal.**

Thank you,

Joan Slimocosky, Treasurer/ co-president

LVHF

From: [Mairead Mac Mullan](#)
To: [DRP Public Comment](#)
Cc: [Tyler Montgomery](#); [Robert Glaser](#); [Joan Slimocosky](#); [Suzanne Goode](#); [Roger Pugliese](#); [Liam Lynch](#); [Michael Blodgett](#)
Subject: Appeal on Project # 2019- 000010, hearing 9am 7/23
Date: Tuesday, July 22, 2025 10:53:35 AM

CAUTION: External Email. Proceed Responsibly.

To the Regional Planning Commission,

I would like to submit into the record the following argument for appeal on the planning granted by LA County planning permission on May 8th 2025 for the project:

Project # 2019- 000010, with the request to construct four new single-family homes on four lots via Parcel Map 10857 in 1981

I contest that in particular reference to **LOT 4 (MINOR CDP NO. RPPL2019000019)**: that it is in violation of the [Public Resources Code \(PRC\) 4291](#)

*In Los Angeles County, if you are building a new home in a very high fire hazard severity zone, you will need to maintain **100 feet** of defensible space around your home, and this includes maintaining distance from your closest neighbor. This 100-foot area is required by law ([Public Resources Code \(PRC\) 4291](#)) and is crucial for reducing the potential for fire spread.*

The current proposed footprint of the structure to be put on **Lot 4 is 10 feet from our property line fence and 66 feet from the structure of our Home.**

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 show 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.
Our property and the proposed new development are in the highest severity zone.

We implore this Regional Planning Commisision to enact your due diligence in enforcing this state law.

I am attaching the [Public Resources Code \(PRC\) 4291](#). *None of us need reminding in Los Angeles County about how important it is to respect defensible space and mitigate fire risk for current and prospective new homeowners in our region. As a family that has now evacuated their home at least 3 times in the last 7 years and packed bags ready to go innumerable others we cannot in good conscience not petition and beg this commission to not willfully create a situation where people and property are put into real and explicit harm,*

Sincerely,
Mairead Mac Mullan
Resident at 24879 Mulholland Hwy, CA 91302

CALIFORNIA CODES

PUBLIC RESOURCES CODE SECTION 4291

4291. A person that owns, leases, controls, operates, or maintains a building or structure in, upon, or adjoining any mountainous area, forest-covered lands, brush-covered lands, grass-covered lands, or any land that is covered with flammable material, shall at all times do all of the following:

(a) Maintain around and adjacent to the building or structure a firebreak made by removing and clearing away, for a distance of not less than 30 feet on each side of the building or structure or to the property line, whichever is nearer, all flammable vegetation or other combustible growth. This subdivision does not apply to single specimens of trees, ornamental shrubbery, or similar plants that are used as ground cover, if they do not form a means of rapidly transmitting fire from the native growth to any building or structure.

(b) Maintain around and adjacent to the building or structure additional fire protection or firebreak made by removing all brush, flammable vegetation, or combustible growth that is located within 100 feet from the building or structure or to the property line or at a greater distance if required by state law, or local ordinance, rule, or regulation. This section does not prevent an insurance company that insures a building or structure from requiring the owner of the building or structure to maintain a firebreak of more than 100 feet around the building or structure. Grass and other vegetation located more than 30 feet from the building or structure and less than 18 inches in height above the ground may be maintained where necessary to stabilize the soil and prevent erosion.

(c) Remove that portion of any tree that extends within 10 feet of the outlet of a chimney or stovepipe.

(d) Maintain any tree adjacent to or overhanging a building free of dead or dying wood. (e) Maintain the roof of a structure free of leaves, needles, or other dead vegetative

growth.

(f) Provide and maintain at all times a screen over the outlet of every chimney or stovepipe that is attached to a fireplace, stove, or other device that burns any solid or liquid fuel. The screen shall be constructed of nonflammable material with openings of not more than one-half inch in size.

(g) Prior to constructing a new building or structure or rebuilding a building or structure damaged by a fire in such an area, the construction or rebuilding of which requires a building permit, the owner shall obtain a certification from the local building official that the dwelling or structure, as proposed to be built, complies with all applicable state and local building standards, including those described in subdivision (b) of Section 51189 of the Government Code, and shall provide a copy of the certification, upon request, to the insurer providing course of construction insurance coverage for the building or structure. Upon completion of the construction or rebuilding, the owner shall obtain from the local building official, a copy of the final inspection report that demonstrates that the dwelling or structure was constructed in compliance with all applicable state and local building standards, including those described in subdivision (b) of Section 51189 of the Government Code, and shall provide a copy of the report, upon request, to the property insurance carrier that insures the dwelling or structure.

(h) Except as provided in Section 18930 of the Health and Safety Code, the director may adopt regulations exempting structures with exteriors constructed entirely of

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nonflammable materials, or conditioned upon the contents and composition of same, he or she may vary the requirements respecting the removing or clearing away of flammable vegetation or other combustible growth with respect to the area surrounding those structures.

No exemption or variance shall apply unless and until the occupant thereof, or if there is not an occupant, the owner thereof, files with the department, in a form as the director shall prescribe, a written consent to the inspection of the interior and contents of the structure to ascertain whether this section and the regulations adopted under this section are complied with at all times.

(i) The director may authorize the removal of vegetation that is not consistent with the standards of this section. The director may prescribe a procedure for the removal of that vegetation and make the expense a lien upon the building, structure, or grounds, in the same manner that is applicable to a legislative body under Section 51186 of the Government Code.

(j) As used in this section, "person" means a private individual, organization, partnership, limited liability company, or corporation.

4291.1.

(a) Notwithstanding Section 4021, a violation of Section 4291 is an infraction punishable by a fine of not less than one hundred dollars (\$100), nor more than five hundred dollars (\$500). If a person is convicted of a second violation of Section 4291 within five years, that person shall be punished by a fine of not less than two hundred fifty dollars (\$250), nor more than five hundred dollars (\$500). If a person is convicted of a third violation of Section 4291 within five years, that person is guilty of a misdemeanor and shall be punished by a fine of not less than five hundred dollars (\$500). If a person is convicted of a third violation of Section 4291 within five years, the department may perform or contract for the performance of work necessary to comply with Section 4291 and may bill the person convicted for the costs incurred, in which case the person convicted, upon payment of those costs, shall not be required to pay the fine. If a person convicted of a violation of Section 4291 is granted probation, the court shall impose as a term or condition of probation, in addition to any other term or condition of probation, that the person pay at least the minimum fine prescribed in this section.

(b) If a person convicted of a violation of Section 4291 produces in court verification prior to imposition of a fine by the court, that the condition resulting in the citation no longer exists, the court may reduce the fine imposed for the violation of Section 4291 to fifty dollars (\$50).

4292. Except as otherwise provided in Section 4296, any person that owns, controls, operates, or maintains any electrical transmission or distribution line upon any mountainous land, or forest-covered land, brush-covered land, or grass-covered land shall, during such times and in such areas as are determined to be necessary by the director or

the agency which has primary responsibility for fire protection of such areas, maintain around and adjacent to any pole or tower which supports a switch, fuse, transformer, lightning arrester, line junction, or dead end or corner pole, a firebreak which consists of a clearing of not less than 10 feet in each direction from the outer circumference of such pole or tower. This section does not, however, apply to any line which is used exclusively as telephone, telegraph, telephone or telegraph messenger call, fire or alarm line, or other line which is classed as a communication circuit by the Public Utilities Commission. The director or the agency which has primary fire protection

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responsibility for the protection of such areas may permit exceptions from the requirements of this section which are based upon the specific circumstances involved.