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All compliant submissions may be accessed as follows:

- **“Initial Submissions”**: Compliant submissions received no later than by end of day Monday of the week prior to the meeting, which are not integrated by reference or exhibit in the Staff Report, will be appended at the end of the Staff Report. The Staff Report is linked to the case number on the specific meeting agenda.
- **“Secondary Submissions”**: Submissions received after the Initial Submission deadline up to 48-hours prior to the Commission meeting are contained in this file and bookmarked by the case number.
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If you are using Chrome, the bookmarks are on the upper right-side of the screen. If you do not want to use the bookmarks, simply scroll through the file.

If you have any questions, please contact the Commission Office at (213) 978-1300.

SECONDARY SUBMISSIONS



Department of City Planning

City Hall, 200 N. Spring Street, Room 525, Los Angeles, CA 90012

April 13, 2026

TO: Central Area Planning Commission

FROM: Jordann Turner, Associate Zoning Administrator

ADDRESS CORRECTION TO THE LETTER OF DETERMINATION FOR CASE NO. ZA-2025-1386-CU1-HCA-1A; 2166 NORTH STANLEY HILLS DRIVE

An incorrect address was used on first page of the letter of determination for Case No. ZA-2025-1386-CU1-HCA. The correct address is used on agenda. The following technical correction needs to be incorporated into the Zoning Administrator's determination dated February 3, 2026 to be considered at the Central Los Angeles Area Planning Commission meeting of April 14, 2026 related to Item No. 6 on the meeting agenda. The correct address should read as follows:

~~2172~~ 2166 North Stanley Hills Drive

All other aspects of the determination letter remain unchanged.



LOS ANGELES
CONSERVANCY

500 South Grand Avenue, Suite 1640
Los Angeles, CA 90071

213 623 2489 OFFICE
213 623 3909 FAX

laconservancy.org

April 9, 2026

Central Los Angeles Area Planning Commission
Attn: Stephanie Gavidia
200 N. Spring St., 10th Floor, Room 1010
Los Angeles, CA 90012
apccentral@lacity.org

Re: 2172 North Stanley Hills Drive & 2166 North Stanley Hills Drive

Dear Members of the Area Planning Commission,

I am writing on behalf of the Los Angeles Conservancy to support the appeal by the Concerned Citizens of Stanley Hills Drive for the two projects located at 2172 North Stanley Hills Drive & 2166 North Stanley Hills Drive. The Conservancy's concern with these cases is the improper demolition of two homes that originally inhabited the site and have since been demolished.

The original main residence and back house, dating to 1950 and 1923 respectively, were demolished without proper notice, a fact validated by nearby residents. Although the houses were not previously identified as historic resources in SurveyLA or previous surveys, the Demolition Notification Ordinance requires public disclosure of demolitions planned for structures older than forty-five years of age, and is designed to allow neighbors a window to provide input and information.

Many of the homes in the Laurel Canyon neighborhood contain important cultural associations with the community of musicians and artists who have long-inhabited the area. Proper demolition procedures should be followed to allow ample input. It's unfortunate that in this instance, the community was not granted their due process rights pursuant to the Demolition Notification Ordinance, a critical period where they could have negotiated preservation alternatives and pursued stronger protections.



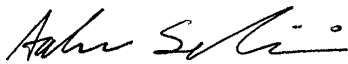
We also understand that demolition occurred without proper clearance from South Coast AQMD. The canyons in the Hollywood Hills are important ecological areas that have managed to balance development and conservation, and we would expect that proper demolition procedures be followed to prevent lead or asbestos contamination.

It is unfortunate that inadequate notice was provided in this case, but are thankful to the Area Planning Commission for taking this case under consideration where we hope the whole of the record will be evaluated. Due to critical lapses in the process of these two cases, we ask you to grant the appeal before you.

About the Los Angeles Conservancy:

The Los Angeles Conservancy is the largest local historic preservation organization in the United States, with nearly 5,000 member households throughout the Los Angeles area. Established in 1978, the Conservancy works to preserve and revitalize the significant architectural and cultural heritage of Los Angeles County through advocacy and education.

Sincerely,



Andrew Salimian
Director of Advocacy





MOUNTAINS RECREATION & CONSERVATION AUTHORITY

King Gillette Ranch
26800 Mulholland Highway
Calabasas, California 91302
PHONE (818) 878-0886

April 9, 2026

Central Area Planning Commission
Mr. Alan Como, Senior City Planner
Department of City Planning
City of Los Angeles
200 North Spring Street, 10th Floor, Room 1010
Los Angeles, California 90012

**ZA-2025-1386-CU1-HCA-1A, 2166 North Stanley Hills Drive,
ZA-2024-6711-CU1-HCA-1A, 2172 North Stanley Hills Drive
ENV-2024-6712-CE**

Dear President Lawrence, Commissioners, and Mr. Como:

The staff of the Mountains Recreation and Conservation Authority (MRCA) strongly supports the appeals of the two above-referenced subject proposed projects located at 2166 and 2172 North Stanley Hills Drive (case nos. ZA-2025-1386-CU1-HCA-1A and ZA-2024-6711-CU1-HCA-1A respectively). MRCA staff support all statements made by the legal counsel for Concerned Citizens of Stanley Hills Drive (the Appellant) in their April 6, 2026 letter.

The Appellant is correct in their assertions that the two subject proposed projects cannot qualify for Categorical Exemptions from the California Environmental Quality Act (CEQA), and their assertion that that each respective project would result in unmitigated significant adverse environmental impacts if allowed to proceed as proposed. The Appellant is equally correct in their assertion that the Zoning Administrator improperly approved the two respective Conditional Use Permits for each project that allow construction on lots "fronting a Substandard Hillside Limited Street (Stanley Hills Drive) where a minimum 20-foot wide Continuous Paved Roadway is not provided from the driveway apron to the boundary of the Hillside Area as required by LAMC Section 12.21 C.1 0(i)(3) of Chapter 1." These approvals each violate State Minimum Fire Safe Regulations for Ingress and Egress with regard to Very High Fire Hazard Severity Zones, which applies to both of the two subject properties.

This is not the first time that the City has been notified that its use of Zoning waivers to conditionally approve discretionary projects on narrow Substandard Hillside Streets in Very high Fire Hazard Severity Zones conflicts with State Fire codes. The routine disregard for wildfire safety on substandard streets in hillside areas should be especially concerning in the aftermath of 2025 wildfires in Pacific Palisades.

The Santa Monica Mountains Conservancy (Conservancy) provided a letter and a figure to the Zoning Administrator on November 3, 2025 which stated that the CEQA analysis

Central Area Planning Commission
Mr. Alan Como, Senior City Planner
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for each project was deficient both for ignoring the presence of woodland habitat on the two subject properties, and for failing to address the importance of that woodland habitat in facilitating wildlife movement between two mapped habitat blocks in the Santa Monica Mountains Zone. The high potential of the two subject projects to result in significant adverse impacts to these biological resources has not been analyzed in the subject CEQA documentation. Despite being a CEQA Trustee Agency for the Santa Monica Mountains Zone (where the subject properties are located), the Conservancy's points have gone unaddressed by both the City and the applicant. Neither of the Letters of Determination issued by the City for the two respective subject projects makes any mention of the points raised in the Conservancy's letter. That letter and its accompanying aerial map are included as attachments to this letter.

Without adequate analysis of direct environmental impacts, the City also lacks adequate information as to how the two subject proposed projects would contribute to Cumulative Impacts from successive projects in the same area. Of particular concern to the MRCA is the ongoing loss of habitat for the local population of mountain lions (*Puma concolor*), which are State-listed as Threatened under the California Endangered Species Act (CESA). The two subject properties are located in the lower Laurel Canyon watershed, where ongoing human development activities continue to remove mountain lion habitat, and obstruct access to the habitat that remains. The two subject projects have high potential to increase these significant, unmitigated cumulative impacts to biological resources.

Of equal, if not greater concern, are the Cumulative Impacts from the City's continual approval of Zoning waivers for discretionary projects on Substandard Hillside Streets in the same Very High Fire Hazard Severity Zone as the subject properties, in clear violation of State Minimum Fire Safe Regulations for Ingress and Egress. Have these Cumulative Impacts to neighborhood wildfire safety been addressed in any environmental filing reviewed by the Planning Department?

The Appellant's April 6, 2026 letter accurately describes the potential Cumulative Impacts to environmental resources that have gone unaddressed in the environmental review for the two subject projects in explicit detail. The Appellant is correct in their assertion that the two subject proposed projects would result in significant unmitigated cumulative impacts to biological resources, and wildfire-related impacts. Under CEQA Guidelines Section 15300.2(b), the City is legally prohibited from utilizing a Categorical Exemption for the subject proposed projects.

Central Area Planning Commission
Mr. Alan Como, Senior City Planner
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Allowing either of the two subject proposed projects to proceed under the current approvals flies in the face of both CEQA, and State Minimum Fire Safe Regulations with regard to Very High Fire Hazard Severity Areas. We ask the Commission to uphold both appeals and deny both subject projects.

Please send any future correspondence regarding either subject project to my attention at either the above letterhead address, or by e-mail. If you have any questions or clarifications, City staff should feel free to contact me at 310-589-3230, ext. 124, or by e-mail at garrett.weinstein@mrca.ca.gov. Likewise, Paul Edelman, Chief of Natural Resources and Planning may also be contacted at 310-589-3230, ext. 128, or by e-mail at paul.edelman@mrca.ca.gov. Thank you for your time and consideration.

Sincerely,



Garrett Weinstein
Project Analyst

Attachments: A – Santa Monica Mountains Conservancy Letter, November 3, 2025.
 B – Aerial Photo Map of 2166 and 2172 North Stanley Hills Drive showing potential wildlife movement between mapped Habitat Blocks.

SANTA MONICA MOUNTAINS CONSERVANCY

LOS ANGELES RIVER CENTER & GARDENS
570 WEST AVENUE TWENTY-SIX, SUITE 100
LOS ANGELES, CALIFORNIA 90065
PHONE (323) 221-8900
FAX (323) 221-9001
WWW.SMMC.CA.GOV



November 3, 2025

Zoning Administrator
City of Los Angeles
200 N. Spring Street
Los Angeles, California 90012

**Opposition to 2166 and 2172 Stanley Hills Drive
Inadequate Biological CEQA Review
ZA-2025-1386-CU-HCA and ZA-2024-6711-CU-HCA**

Dear Zoning Administrator:

The Santa Monica Mountains Conservancy, a CEQA trustee agency for the Santa Monica Mountains zone, opposes both the above referenced projects because both would result in avoidable excessive landform modification thus causing significant biological impacts to habitat and significant trees. The rear (and some front) portions of the subject lots contain mature vegetation that is integral to a wooded, closed canopy year-yard habitat block spanning over 1,000 feet. Such an extensive woodland of native and not native mature trees is a significant biological resource particularly for raptors. See attached figure.

Hillside projects that require 20-foot-tall castle wall retaining wall systems to accommodate pools represent excessive landform alteration and result in avoidable quantitative and qualitative loss of mature tree canopy in a large woodland. To reduce the two proposed projects' biological impacts to a level less than significant, the rear yard areas must remain in the ungraded, natural landform state, free of retaining walls, with irrigated vegetation. That excessiveness is demonstrably heightened by the requested variance to construct the two homes on a substandard street that has been over capacity for decades in regards to life and safety hazards. The proposed projects do not belong in this constrained location and must be reduced in scope – such as with one house total, avoiding significant trees, and no rear yard retaining walls.

The CEQA analysis to date completely omits any analysis of the onsite woodland and how it is part of a larger woodland. Without that analysis, any mitigation cannot be adequately informed. Furthermore, that woodland is less than 250 feet away from the MRCA's and LCLT's 26 protected acres in a 50-acre habitat block to the west. This proximity

Zoning Administrator
2166 and 2172 Stanley Hills Drive
November 3, 2025
Page 2

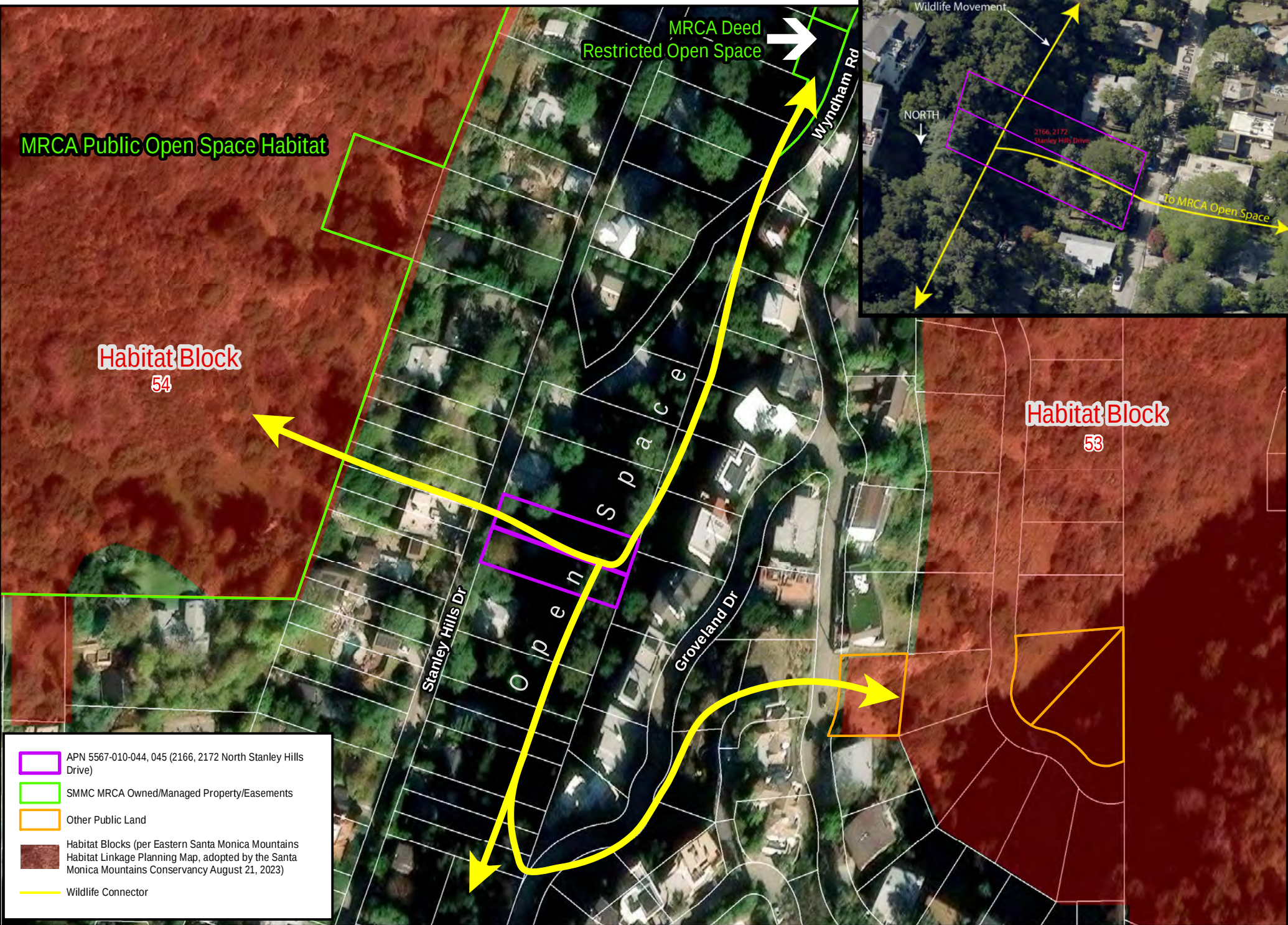
to large habitat blocks both to the west and east significantly adds to the ecological value of the woodland that includes the two proposed houses.

The full findings for the protection of natural resources and a full attempt to include possible life safety modifications cannot be made.

Sincerely,

A handwritten signature in black ink, appearing to read "Paul Edelman", with a long horizontal flourish extending to the right.

PAUL EDELMAN
Deputy Director
Natural Resources and Planning



Case Nos:
ZA-2024-6711-CU1-HCA, ENV-2024-6712-CE, 2172 North Stanley Hills Drive
ZA-2025-1386-CU1-HCA, ENV-2024-6712-CE, 2166 North Stanley Hills Drive

Dear Alan,

I have enclosed the recording from the AQMD inspector from January of 2025. There are also several reasons that the project should stop. The workers that performed the demolition were exposed for days and were not wearing masks or respirators when they performed the demolition. The entire neighborhood was also exposed for the last year.

There was no written notice of demolition given to the neighbors or to the council district office that is also required by law. The Engineer Jerome Palma P.E. from the dept of building and safety let the builders agent know that this was a 100 year old building. Sami Kohanim said in our August meeting that it was only 20 years old. In addition there was no 11 x17 waterproof sign that is required by law. This was a 100 year old home that was built when Laurel canyon was first settled. The first floor was torn down without any permit a year earlier in December of 2023. This was an illegal demolition and the city can impose a 5 year moratorium using the scored earth policy that has been used for demolition of 100 year old homes in Los Angeles in the past.

The three hundred year old trees on the property have been there since the beginning of Laurel Canyon in the 1920s. They all are over 100 feet tall.

They are part of our heritage and have been here since Stanley Hills Dr. was paved in 1929. Their protection is more important than a dangerous development on a substandard street on a property that has been vacant for over 55 years. The trees grew with the two old houses and they should have been restored not torn down and the property cut into 2 lots with 37 feet of width. This also puts two houses very close to each other and this causes a dangerous situation in case of fire. The traffic and density of this street has changed significantly in the last few years making it very unsafe to build on a substandard street that is only 12 feet wide when cars are parked. That is why the law states no building of new homes on a sub 20 feet wide street in high fire areas was passed in July 2021. This law was designed for our safety and ability to leave in an emergency. This is a high risk fire area and this project puts all of our community in a very dangerous position. Please stop the project from moving forward.

Kind regards,
Randy Dodge

AQMD Inspector Recording:

[Click Here to Listen in Browser](#)





All Applications must be filled out by Applicant

PLANS AND SPECIFICATIONS
and other data must also be filed

Bldg. Form 2

2

BOARD OF PUBLIC WORKS
DEPARTMENT OF BUILDINGSApplication for the Erection of Frame Buildings
CLASS "D"

To the Board of Public Works of the City of Los Angeles:

Application is hereby made to the Board of Public Works of the City of Los Angeles, through the office of the Chief Inspector of Buildings, for a building permit in accordance with the description and for the erection of a building as set forth. This application is made subject to the following conditions, which are hereby agreed to by the undersigned applicant, which shall be deemed conditions entering into the exercise of the permit:

First: That the permit does not grant any right or privilege to erect any building or structure therein described, or any portion thereof, upon any street, alley, or other public place or portion thereof.
Second: That the permit does not grant any right or privilege to use any building or other structure therein described, or any portion thereof, for any purpose that is, or may hereafter be prohibited by ordinance of the City of Los Angeles.
Third: That the granting of the permit does not affect or prejudice any claim of title to, or right of possession in, the property described in such permit.TAKE TO
REAR OF
NORTH
ANNEX
1st FLOOR
CITY CLERK
PLEASE
VERIFYTAKE TO
ROOM No. 405
SOUTH
ANNEX
ENGINEER
PLEASE
VERIFY

Lot No. 162-163 Block 70 #
(Description of Property)
Rayston Street to
Lawrence Canyon
District No. 240 M. B. Page 6 F. B. Page 6
No. 240 So Canyon Street
(Location of Job)
Rayston Canyon & Lawrence Canyon
(USE INK OR INDELIBLE PENCIL)

- Purpose of Building Dwelling No. of Rooms 3 No. of Families one
- Owner's name Geo O. Hilder Phone 487550
- Owner's address 250 So Canyon
- Architect's name same Phone
- Contractor's name same Phone
- Contractor's address same
- VALUATION OF PROPOSED WORK (including Plumbing, Gas Fitting, Sewers, Casework, Elevators, Painting, Finishing, all Labor, etc.) \$ 1750.00



- VALUATION OF PROPOSED WORK (including Plumbing, Gas Fitting, Sewers, Casework, Elevators, Painting, Finishing, all Labor, etc.) \$ 1750.00
- Is there any existing (old) building on lot? no How used? no
- Size of proposed building 24 x 30 Height to highest point 18 feet
- Number of Stories in height one Character of ground side hill - 1/2 mile
- Material of foundation concrete Size of footings 12" Size of wall 6" Depth below ground 6"
- Material of chimneys brick Number of inlets to flue one Interior size of flues 7 x 7
- Give sizes of following materials: REDWOOD MUDDSILLS 2 x 6 Girders 4 x 4
EXTERIOR studs 2 x 3 INTERIOR BEARING studs 2 x 3 Interior Non-Bearing studs 2 x 3
Roof rafters 2 x 6 FIRST FLOOR JOISTS 2 x 8
Second floor joists 2 x 8 Specify material of roof Composition
- Will all provisions of State Dwelling House Act be complied with? yes

I have carefully examined and read the above application and know the same is true and correct, and that all provisions of the Ordinances and Laws governing Building Construction will be complied with, whether herein specified or not.

OVER (Sign here) Geo O. Hilder
(Owner or Authorized Agent.)

PERMIT NO: 36662	Plans and Specifications checked and found to conform to Ordinances, State Laws, etc. <u>160/100/100</u> Plan Examiner <u>2</u>	Application checked and found O.K. <u>160/100/100</u> Clerk <u>2</u>	Stamp: RECEIVED AUG 13 1923 1000
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Footprints of Borris Karloff 1959



jerome.palma@lacity.org Jerome Magat Palma
To: entitleandpermits@gmail.com Entitle and Permits

Wednesday, September 4, 2024 at 7:12:25 AM Pacific Daylight Time

Hi Sami,

It looks like there is an LADBS record for the house that was built in 1923. Please see attached. Unfortunately, we will require two demo permits moving forward since there are 2 SFDs on this lot.

Thanks,

Jerome Palma, P.E.

Structural Engineering Associate III
Los Angeles Department of Building and Safety
6262 Van Nuys Blvd #251
Van Nuys, CA 91401

For general Zoning and Building code questions, please refer to call center - 311 or (213) 473-3231. Also, for additional information you may visit our website at: LADBS.org

On Fri, Aug 30, 2024 at 4:37 PM Entitle and Permits <entitleandpermits@gmail.com> wrote:

Thank you.

Best Regards,

Sami Kohanim

Entitle and Permits

phone: 310-571-5833

mobile: 310-488-1369

site: www.EntitleandPermits.com

email: EntitleandPermits@gmail.com

address: 18375 Ventura Blvd., Suite #120, Tarzana, CA 91356

This e-mail and any attachments contain information from Entitle and Permits, and are intended solely for the use of the named

1011210202454263031



**AFFIRMATION OF POSTING FOR DEMOLITION OF
EXISTING BUILDINGS OR STRUCTURES**
LAMC Section 91.106.4.5.1

Project Address: 2170 N. Stanley Hills Dr. Demolition Permit #: 24019-20000-04308

Affirmation of Posting

The Los Angeles Municipal Code (LAMC) Section 91.106.4.5.1 requires posting of a notice prior to the issuance of a permit for demolition of an existing building or structure for which the original building permit was issued more than 45 years prior to the date of submittal of the application for demolition preinspection, or where information submitted with the application indicates that the building or structure is more than 45 years old based on the date the application is submitted, the property shall be posted in a conspicuous place near the entrance of the property where demolition will occur, with a public notice of the application for demolition preinspection.

I hereby affirm that the property located at 2170 N. Stanley Hills Drive was posted on 3/12/24 (mm/dd/yyyy) in accordance with LAMC 91.106.4.5.1 at least 30 days prior to the issuance of this permit for demolition of the existing building(s) or structure(s).

Print Name: Sami Fokanah

Signature: [Signature] Date: 3/12/24

Please check one: () Owner, () Contractor, ☒ Authorized Agent for owner/contractor

FOR DEPARTMENT USE ONLY

DPI Application #: 24019-20000-01023 Date notification letters mailed: 3/12/24

Note: Verify notification and posting were completed at least 30 days prior to demolition permit issuance.

Reviewed by (print name): Kanyar Fomon Signature: [Signature]

1011210202454263031

Address: 2170 N. Stanley Hills Dr.

Application # 2409-20000-04308



Printed: 10/14/20 10:13 AM

City of Los Angeles - Department of Building and Safety
**Attachment to Application for Demolition Permit:
Notice and Owner's Declaration Related to CEQA
and Project Scope**

I. Notice to Owner

If you are applying for a demolition permit to facilitate the construction or development of the project site, you may be referred to the Planning Department for further assistance.

The California Environmental Quality Act (CEQA) directs public agencies to assess and disclose the environmental effects of the projects it approves. In determining whether a proposed project is subject to CEQA, the City is required to consider all of the parts and phases of the project and may not limit its review to the specific permits or approvals sought. (Public Resources Code Section 21065) Failure by a project applicant to disclose future construction or development activities on the project site may result in a violation of CEQA. If the City determines that an application or approval is part of a larger undisclosed project, the City may revoke and/or stay any approvals until a full and complete CEQA analysis of the whole project is reviewed and an appropriate CEQA clearance is adopted or certified.

Please contact the Planning Department if you have additional questions after reviewing this notice.

II. Owner's Project Information

Based upon the above-stated rule, is the proposed demolition part of a larger development project at the demolition site, and if so, will the larger project require any discretionary approvals from the City? (Select "Yes" or "No," and follow the related instructions)

Yes ☒ A CEQA clearance from the Planning Department will be required prior to the issuance of the demolition permit for the proposed project. Return this form to a Department of Building and Safety Plan Check Engineer at the time of plan check.

No ☐ Sign and notarize the signature at the bottom of the form and return the notarized form to a Department of Building and Safety Plan Check Engineer at the time of plan check.

III. Owner's Declaration

I own the property located at _____. I have read the above "Notice to Owner." I understand that a "project," as defined by CEQA, is the whole of the proposed activity and is not limited to the demolition subject to this application. I further understand that CEQA prohibits treatment of each separate approval as a separate project for purposes of evaluating environmental impacts. I acknowledge and understand that should the City determine that the demolition proposed is part of a larger project requiring any discretionary permits, the City may revoke and/or stay any approvals (including certificates of occupancy) until a full and complete CEQA analysis is prepared and clearance is adopted or certified.

I certify that (i) the demolition authorized by this permit is not to facilitate the construction or development of a larger project at the project site, or (ii) the demolition is part of a larger project and, after using all reasonable efforts, including consulting with the City Planning Department, I have determined there are no discretionary permits required for the project, including but not limited to haul route permits, permits to remove protected trees, historic resource review, or any discretionary zoning or map approvals.

Date _____ Name of the Owner (Print) _____

Signature _____

(See page 2 of 2 For Notary Acknowledgment)

Job Address: 2170 N. Stanley Hills Dr. Application #: 24019-20000-04308

City of Los Angeles - Department of Building and Safety
Signature Declaration Attachment Form

Instructions

Applicant (contractor, owner, or agent): Complete and sign the appropriate statements below only after completely reviewing the entire permit application for accuracy. Also, indicate the job address on the top of the form. This attachment will become part of the permit application.

Building and Safety Staff Member: Complete the "APPLICATION#:" and make sure the job address is shown above. Give a copy of the permit application to the applicant.

"Signature Declaration"

PERMIT EXPIRATION/REFUNDS: This permit expires two years after the date of the permit issuance. This permit will also expire if no construction work is performed for a continuous period of 180 days (Sec. 98.0602 LAM C). Claims for refund of fees paid must be filed within one year from the date of expiration for permits granted by LADBS (Sec. 22.12 & 22.13 LAMC). The permittee may be entitled to reimbursement of permit fees if the Department fails to conduct an inspection within 60 days of receiving a request for final inspection (HS 17951).

17. LICENSED CONTRACTOR'S DECLARATION

I hereby affirm under penalty of perjury that I am licensed under the provisions of Chapter 9 (commencing with Section 7000) of Division 3 of the Business and Professions Code, and my license is in full force and effect. The following applies to B contractors only: I understand the limitations of Section 7057 of the Business and Professional Code related to my ability to take prime contracts or subcontracts involving specialty trades.

License Class: _____ License No.: _____ Contractor: _____

18. WORKERS' COMPENSATION DECLARATION

I hereby affirm, under penalty of perjury, one of the following declarations:

☒ I have and will maintain a certificate of consent to self insure for workers' compensation, as provided for by Section 3700 of the Labor Code, for the performance of the work for which this permit is issued.

☐ I have and will maintain workers' compensation insurance, as required by Section 3700 of the Labor Code, for the performance of the work for which this permit is issued. My workers' compensation insurance carrier and policy number are:

Carrier: _____ Policy Number: _____

☐ I certify that in the performance of the work for which this permit is issued, I shall not employ any person in any manner so as to become subject to the workers' compensation laws of California, and agree that if I should become subject to the workers' compensation provisions of Section 3700 of the Labor Code, I shall forthwith comply with those provisions.

WARNING: FAILURE TO SECURE WORKERS' COMPENSATION COVERAGE IS UNLAWFUL, AND SHALL SUBJECT AN EMPLOYER TO CRIMINAL PENALTIES AND CIVIL FINES UP TO ONE HUNDRED THOUSAND DOLLARS (\$100,000), IN ADDITION TO THE COST OF COMPENSATION, DAMAGES AS PROVIDED FOR IN SECTION 3706 OF THE LABOR CODE, INTEREST, AND ATTORNEY'S FEES.

19. ASBESTOS REMOVAL DECLARATION / LEAD HAZARD WARNING

I certify that notification of asbestos removal is either not applicable or has been submitted to the AQMD or EPA as per section 19827.5 of the Health and Safety Code. Information is available at (909) 396-2336 and the notification form at www.agmd.gov. Lead safe construction practices are required when doing repairs that disturb paint in pre-1978 buildings due to the presence of lead per section 6716 and 6717 of the Labor Code. Information is available at Health Services for LA County at (800) 524-5323 or the State of California at (800) 597-5323 or www.dhs.ca.gov/childlead.

20. CONSTRUCTION LENDING AGENCY DECLARATION

I hereby affirm under penalty of perjury that there is a construction lending agency for the performance of the work for which this permit is issued (Sec. 3097, Civil Code).

Lender's Name (If Any): _____ Lender's Address: _____

21. FINAL DECLARATION

I certify that I have read this application INCLUDING THE ABOVE DECLARATIONS and state that the above information INCLUDING THE ABOVE DECLARATIONS is correct. I agree to comply with all city and county ordinances and state laws relating to building construction, and hereby authorize representatives of this city to enter upon the above-mentioned property for inspection purposes. I realize that this permit is an application for inspection and that it does not approve or authorize the work specified herein, and it does not authorize or permit any violation or failure to comply with any applicable law. Furthermore, neither the City of Los Angeles nor any board, department officer, or employee thereof, make any warranty, nor shall be responsible for the performance or results of any work described herein, nor the condition of the property nor the soil upon which such work is performed. I further affirm under penalty of perjury, that the proposed work will not destroy or unreasonably interfere with any access or utility easement belonging to others and located on my property, but in the event such work does destroy or unreasonably interfere with such easement, a substitute easement(s) satisfactory to the holder(s) of the easement will be provided (Sec. 91.0106.4.3.4 LAMC).

By signing below, I certify that:

(1) I accept all the declarations above namely the Licensed Contractor's Declaration, Workers' Compensation Declaration, Asbestos Removal Declaration / Lead Hazard Warning, Construction Lending Agency Declaration, and Final Declaration; and

(2) This permit is being obtained with the consent of the legal owner of the property.

Print Name: Raulber Zarrin Sign: _____ Date: 11/14/24 Owner () Contractor () Authorized Agent



Fwd: 2172 and 2166 Stanley Hills Dr. (ZA-2025-1386-CU-HCA and ZA-2024-6711-CU-HCA)

1 message

Kim Gottlieb-Walker <kingottliebwalker@gmail.com>

Wed, Apr 8, 2026 at 8:57 AM

To: "apccentral@lacity.org" <apccentral@lacity.org>

Dear Planning Commission,

My husband and I moved to [2157 Stanley Hills Dr](#) in 1977 with our (then) 4 year old son. In the mid-nineties we expanded our home to accommodate our growing family, **following all the rules**. My daughter now lives next door at 2161 Stanley Hills Dr (a bungalow on a traditional double lot). We also acquired the double lot adjacent to us on the other side of us, so our single family home is on 5 bungalow lots, leaving all the trees and greenery in place.

Stanley Hills Drive is a **vital exit route for the 1500 homes above us**, and because it is **barely 18' wide and has cars parked on one side**, it is often **gridlocked** because of delivery vehicles, garbage trucks, redirected traffic...and a single construction vehicle in the street can cause hours of gridlock. It is impossible for residents to exit in an emergency while firetrucks are trying to get in.

The LAW which states there can be no new construction on streets under 20' wide is there for a reason! Our lives are literally at stake in an emergency. This neighborhood has been **designated by the fire department as a EXTREMELY HIGH FIRE DANGER AREA** and too close proximity of houses dramatically increases the danger of swiftly spreading fires. **The proposed construction would add TWO houses that would be in too close proximity to the neighboring homes, and the plans do not show adequate spacing. The proposal also requires over the 750 allowable cubic feet of earth to be removed.**

Compounding this, **without the REQUIRED notification to each resident** that there would be demolition of an over 100 year old house on that property (that had been deserted for over 50 years)

The builder, in the middle of the night, brought unprotected workers to tear it down - a serious health hazard for the entire area that will manifest for decades to come, and the contaminated remains of the house were apparently taken to a dump not appropriate for hazardous material. The remaining earth is likely also contaminated (an L.A. Times article recently revealed the depth of the asbestos problem after the houses were destroyed in the Palisades and Eaton fires).

This blatant disregard for the law, and for the health and safety of the entire neighborhood, should be punished with a minimum of a five year moratorium for that builder on any building **(as has been imposed on other builders who ignored the law and endangered the residents)**. And that doesn't even address his liability for the health issues which may arise as a result of his irresponsible actions.

On top of that, **the slope of the street exceeds what is allowable for building**, and it would be impossible for the builder to widen the street all the way down to the nearest 20' street (Lookout Mountain) without tearing down existing homes and garages which were built within a foot of the street, and **chopping down several old growth trees (giant pines and a redwood, over 100' tall which are irreplaceable)**, important to the ecology of Laurel Canyon, where our raptor hawks and owls, who maintain the balance of nature controlling the rodent population, live and perch.

(also see: Opposition to 2166 and 2172 Stanley Hills Drive - Inadequate Biological CEQA Review ZA-2025-1386-CU-HCA and ZA-2024-6711-CU-HCA)

There is no way that the law should be ignored any longer. Laurel Canyon and Stanley Hills Dr are a fragile and vulnerable community. The devastating recent fires proved how vulnerable canyon homes are and how important those laws are to preserving both life and property. This builder has ignored the laws already, and endangered us all, and should not be allowed to continue ignoring the rules and regulations that protect our lives.

We urge the planning commission to deny this project in its entirety and recommend consequences for the unscrupulous builder, whose only concern is turning a profit, at the expense of our health and safety.

Thank you to the council for listening to our urgent concerns.

The Walker Family

Kim, Jeff, Ethan, and Rachel

2157 and 2161 Stanley Hills Dr

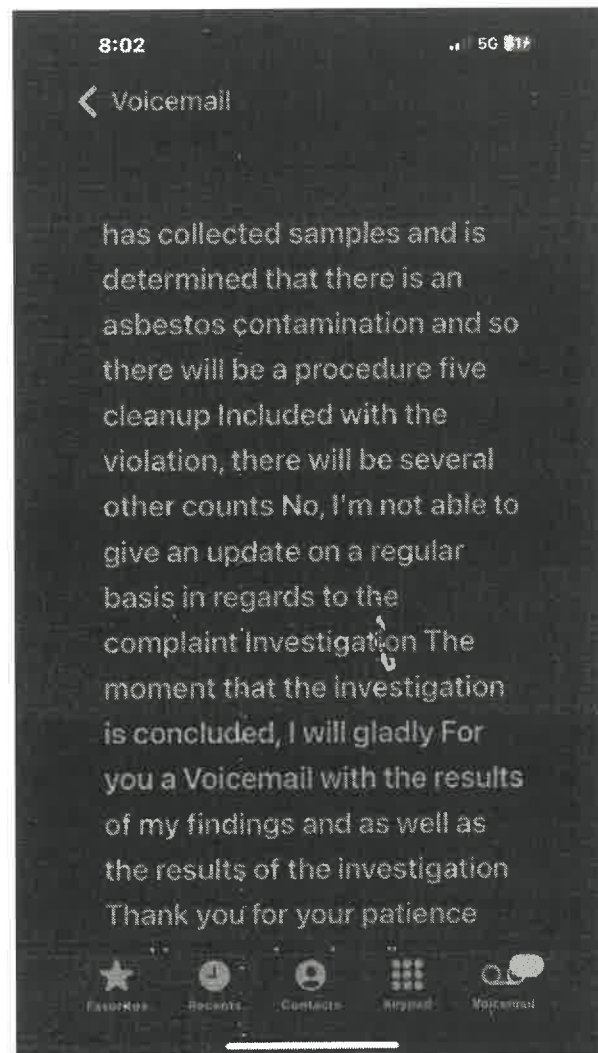
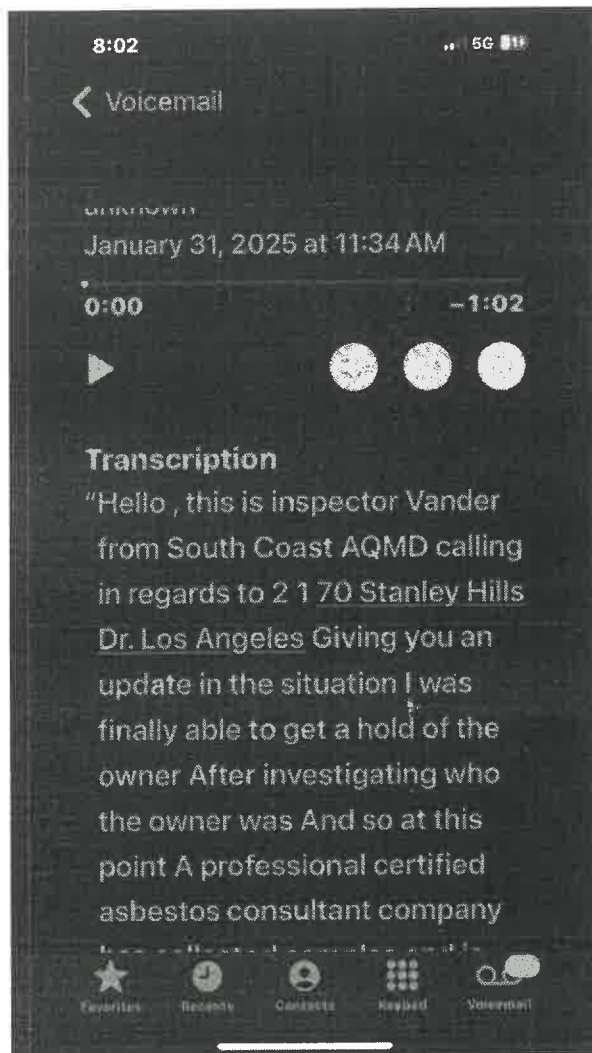
ps

If the builder had not exposed us to asbestos when illegally tearing down the house that was there, and had plans to build ONE modest single family home, set back on the lot to provide off road staging, space from the neighboring homes and no tree removal, as is the standard for this fragile area, we would have welcomed him. But this current plan and total disregard for the health and safety of the neighborhood is completely unacceptable.

DAY OF HEARING SUBMISSIONS

#52 #6

AQMD Inspector Voicemail Transcript



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AREA PLANNING COMMISSION

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*ALSO Admitted in Texas

April 14, 2026

VIA E-MAIL

Central Area Planning Commission
200 N. Spring St.
Los Angeles, CA 90012
apccentral@lacity.org

Re: Rebuttal to Staff Presentation – Unlawful Deferral of State Minimum Fire Safe Regulations Compliance (Case Nos. ZA-2025-1386-CU1-HCA & ZA-2024-6711-CU1-HCA)

Dear Members of the Central Area Planning Commission:

This submittal is presented on behalf of Concerned Citizens of Stanley Hills Drive to address the City's assertion that the proposed projects at 2166 and 2172 Stanley Hills Drive ("Projects") non-compliance with the State Minimum Fire Safe Regulations ("Fire Safe Regulations") can be legally resolved later. The City's staff presentation ("Staff Presentation") argues that Condition No. 12—which requires the applicant to obtain Los Angeles Fire Department ("LAFD") approval prior to the issuance of ministerial permits—sufficiently addresses the Projects' current fire safety deficiencies.

This position is a gross misinterpretation of the law. The City's attempt to defer compliance with mandatory state fire safety standards to a future, closed-door LAFD review is legally invalid and currently the subject of active litigation against the City.

On December 23, 2025, our firm filed a Verified Petition for Writ of Mandate, *Federation of Hillside and Canyon Associations, Inc., et al. v. City of Los Angeles* ("Hill- Fed Lawsuit"), challenging this exact unlawful pattern and practice. As carefully detailed in that lawsuit, the City consistently fails to apply the Fire Safe Regs. to the issuance of both discretionary and building permits by falsely asserting that other departments—namely LAFD or the Bureau of Engineering ("BOE")—are solely responsible for implementation and enforcement. The City cannot rely on hypothetical future clearances to cure present violations of state law.

The City's "we'll do it later" position fails legally for the following specific reasons:

I. The Law Does Not Allow Deferrals Based on "Feasibility"

The City's standard practice when deferring to LAFD or BOE is to claim that future permits will resolve any noncompliance with the Fire Safe Regs. "to the extent feasible." As argued in the Hill-Fed Lawsuit (citing the City's egregious approvals at 10453 Sandal Lane as a prime example), this "feasibility" standard is entirely fabricated by the City and exists nowhere in the state statute. The Fire Safe Regs. do not authorize deviations or exceptions based on whether compliance is "feasible" for the developer. Instead, the law mandates that any deviation must affirmatively provide the same practical effect as the standard in providing for firefighter safety, emergency access, and civilian egress ("Same Practical Effect"). By deferring the issue to LAFD under Condition No. 12, the City is illegally swapping the mandatory Same Practical Effect standard for an arbitrary, legally baseless "feasibility" standard.

II. LAFD Does Not Actually Review for State Minimum Fire Safe Regulations Compliance

The City has previously argued in its answer to the Hill-Fed Lawsuit that they are complying with the California Building Code and the California Fire Code, and therefore are allegedly complying with the State Minimum Fire Safe

Regs. The Department of City Planning has explicitly relied on this faulty logic, previously stating: “Public Resources Code Sections 4290 and 4291 are implemented by the City Fire Code, and the City adopted Title 24 of the California Code of Regulations (California Building Code).”

However, the entire premise that the City is relying on to meet its legal obligations is fundamentally flawed. As previously noted, the City Fire Code and Title 24 of the California Code of Regulations are *not* more restrictive than the State Minimum Fire Safe Regs. Critically, they are *substantially less restrictive*. Under 14 C.C.R. § 1270.05, local regulations can only supersede the State Minimum Fire Safe Regs. if they equal or exceed the state’s minimum standards. Because the City’s building and fire codes fall severely short of the state standards, the City cannot lawfully claim that adhering to Title 24 or the City Fire Code satisfies its obligations under Public Resources Code § 4290.

Adding a condition of approval (Condition No. 12) that says LAFD will review the project and determine compliance *later* is wholly insufficient because we know that the City does not actually have a plan check process in place to review projects for compliance with the State Minimum Fire Safe Regs. It is not that LAFD does not review projects before building permits are issued; rather, they do not review projects to determine whether they comply with the State Minimum Fire Safe Regs. The only thing LAFD reviews is whether the project complies with the existing, less restrictive fire hazard mitigation regulations set forth in the standard building code and the city code.

LAFD has no policy or procedure requiring them to review a project for State Minimum Fire Safe Regs. compliance, nor do they condition projects to include alternative measures that have the mandatory Same Practical Effect as required by state law. Furthermore, no other City department does this either. Instead, the City just kicks the can down the road on this critical safety issue, and the various departments simply point fingers at each other while rubber-stamping non-compliant development.

III. Deferral Bypasses the Mandatory Exception Process and State Oversight

If a project cannot meet the strict minimum standards for roadway width or grade, the only lawful mechanism to deviate from those standards is through a formal exception process under 14 C.C.R. § 1270.07 ("Exception"). An Exception must be formally requested in writing by the applicant, evaluated on a case-by-case basis, and accompanied by specific alternative measures that guarantee the Same Practical Effect. Furthermore, the law mandates that any Exceptions granted by the local jurisdiction must be forwarded to the California Department of Forestry and Fire Protection ("CAL FIRE") unit headquarters. By kicking the can down the road and relying on LAFD to quietly sign off on the permits later, the City completely bypasses the required Exception process, shuts out public review, and illegally obstructs essential oversight by CAL FIRE. As alleged in our Petition, the City cannot point to another agency’s later review as an excuse to avoid its clear, present, and ministerial duty to enforce the Fire Safe Regs. during the entitlement phase.

IV. Conclusion

The City’s position fundamentally undermines the intent of the Fire Safe Regs., which were adopted to ensure that the design and construction of new developments provide for basic emergency access before they are approved. As established in the Hill-Fed Lawsuit, while a substandard road like Stanley Hills Drive may have been exempt prior to development, the introduction of *new development* brings the roadway squarely within the scope of the Fire Safe Regs. The project must bring the road into compliance or obtain a proper Exception. The fact that these Projects are being constructed at the end of a substandard, 18-foot-wide road does not negate the triggering effect of the new construction; rather, it makes adherence to the state minimums all the more critical.

Condition No. 12 is a legally inadequate deferral of mitigation. Because the Projects do not currently comply with the Fire Safe Regs. - and the applicant has not secured an Exception demonstrating the Same Practical Effect - the Central Area Planning Commission cannot legally make the necessary findings to uphold the Zoning Administrator’s determination. We urge you to grant the appeal and deny the conditional use permits at issue,

I may be contacted at 310-982-1760 or at jamie.hall@channellawgroup.com for questions, comments or concerns.

Sincerely,
/s/Jamie T. Hall

February 11, 2015

TO: Central Area Planning Commission

FROM: C. A. Fry, President, Craig Fry and Associates

SUBJECT: APPEAL OF ZA CASES #2013-2084-ZAO-1A
AND #2013-2087-ZAD-1A

Commissioners:

I have been asked by the Community to review the projects that have been proposed at the following address 2172, 2170, and 2166 Stanley Hills Drive, Los Angeles 90046.

I was asked to review this project because the people living in this community felt that I was qualified by having served as their Local Fire Battalion Commander and as the Fire Marshal for the City of Los Angeles. I served as a member of the Los Angeles Fire Department for over 30 years and was responsible for both Emergency Operations and Fire Code Development and Code Enforcement for the City of Los Angeles.

The concerned neighbors asked me to review the following areas that may have not been addressed during the original hearing.

- Impact on Emergency Vehicle response to emergencies.
- Impact on the spread of Fire due to the proximity of the houses.
- Substandard Road conditions.
- Additional Traffic and its impact during a Brush Fire. **Impact on the ability of Emergency Vehicles to respond promptly.**

Stanley Hills Drive is considered a major thoroughfare by the Los Angeles Fire Department; it is a vital artery for Fire Apparatus to travel to an emergency incident for over 1500 homes in a Very High Fire Severity Zone. The Los Angeles Fire Department has a goal of reaching a victim of an emergency within five minutes of the call to the 911 operators. This area of the City has always been almost impossible to meet that standard due to the traffic associated with the streets and the distance from a fire station. Contractors and developers MUST work with LAFD on a plan that will not further jeopardize the residents to delays by emergency responders.

With the addition of heavy construction vehicles and equipment, as well as workers and pedestrians on a steep, substandard hillside street with no sidewalks, both Fire Trucks and Ambulances will most certainly be delayed, and lead to potential loss of life.

Impact of spread of Fire due to the proximity of the homes

One of the most dangerous conditions a community can face is the unchecked spread of fire. Normally, this is addressed by two very simple methods. The first method is separation between combustible materials; the second method is the ability to apply water to reduce the amount of heat (BTU'S). There is a concern upon review due to the distance between these homes because by the time fire apparatus arrive on scene it will be nearly impossible to take an offensive position and the unfortunate tactics of having to sacrifice other homes may need to be employed to protect the entire community. In a wind driven fire situation, it will be almost impossible to stop the spread of fire and therefore lead to a major catastrophe.

Substandard Roads

Stanley Hills Drive is considered by City Standards as a substandard Roadway, this is because of the width and the amount of vehicular traffic on an hourly basis. The roadway was built in the early 1900's and was designed for moderate vehicle traffic for smaller vehicles not the large SUV's of today. It is not unusual for residents traveling in both directions to have to wait for the opportunity to proceed, basically making this road a one-way unsafe path of travel. On days when trash is picked up it is likely to take three to four times the normal amount of time to enter or exit this Canyon Community. The addition of worker parking and deliveries will most certainly be significantly detrimental to the public safety of residents, workers, and emergency responders, alike.

Additional Traffic Impact during a Brush Fire Situation

The Los Angeles City Fire Department, County of Los Angeles Fire Department and the State of California Department of Emergency Operations consider the area in and near the Laurel Canyon to be a Very High Severity Zone for Fire Operations. The impact of additional vehicles, heavy equipment and people attempting to leave while emergency apparatus are attempting to enter the area has the potential to have a deadly outcome, much like the 1991 Oakland Hills Fire in which 25 people were killed and over 150 people injured due to the inability for residents to exit the danger area and emergency personnel to position themselves in a timely manner.

I believe that people have the right to build on their property but plans need to be put in place to monitor and enforce mitigations, in coordination with the Los Angeles Fire Department, in order to protect the lives of both residents and emergency personnel.

Initial review plans must address the environmental impact on this substandard hillside roadway, which serves as a crucial escape route in an extremely high-fire-

danger urban area. Any City approvals must take into consideration the consequence of increasing population density without addressing the corresponding need for improvement of infrastructure, including police, fire, and medical response. Certainly, any decisions by Building and Safety must include measures for monitoring and enforcement of codes and conditions, in order to fully protect the public safety and ensure the crucial timely response by fire and medical personnel at all times in case of emergency. It is my expert opinion that an Environmental Impact Report is the appropriate and necessary response to these cases.

If you have any questions please feel free to contact me at 626 665-9525

Craig Fry
President Craig Fry and Associates





Case # ZA-2025-1386-CUI-HCA-1A;ZA-2024-6711-CUI-HCA-1A;related # ZA-2024-6711-CUI-HCA;
ZA-2025-1386-CUI-HCA;Case No:ENV-2024-6712-CE

WHY ARE WE HERE? After reviewing the documents I received from the LADBS Custodian of Records public search, I learned that the Application for Inspection to Demolish Building or Structure Permit # 24019-20000-04308 is INVALID making the demolition that took place illegal. I have provided a highlighted copy for your review. BEFORE this lawyer/owner/builder demolished not 1 but 2 structures, of which were 100 years old and the other was 75 years old, possessing cultural significance. He was aware of this fact but destroyed the 2nd floor of the historic house one year BEFORE he applied for his app. to Demolish.

WHY DO I KNOW THAT? In the records search there is an email from the City sent to his permit processor, Sami Kohanin, (processor) not only informing him of that fact, but the Engineer, Jerome Palma, attached the copy of the original permit dated 1923 in his email. **HOW DO I KNOW** that the processor received it? He responded "thank you". He was put on notice that these structures needed careful consideration for many reasons but BEFORE the in the "midnight hours" demolition took place, this lawyer/owner/builder violated all of the following: (1) Federal (EPA), Disposal and Handling Rules must meet Federal NESHAP (2) State CA/OSHA Title 8:1529 Asbestos Abatement Regulated asbestos must be removed by a LICENSED contractor, (3) CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA), Section 15061 potential impacts on historical or hazardous material removal may be necessitate a MITIGATED NEGATIVE DECLARATION and this form was not returned BEFORE the permit was issued. **WHY DO I KNOW** It is not in the Cust. Of Records file (4) SOUTH COAST AQMD Rule 1403- hiring a Cal/OSHA certified consultant for an asbestos survey prior to any renovation or demolition.(5) California H&S Code Sections 25915-25919 govern asbestos....identification...to prevent dangerous exposure. It mandates signage notice, notice of renovations, and adherence to safe handling regulations to avoid lung disease and cancer **WHY DO I KNOW HE DID NOT:** Because I called AQMD and after they completed their investigation the AQMD field inspector left me a voicemail and they subsequently issued the lawyer/owner a violation P7777 against the property.. (6) LADBS Lawyer/owner/builder submitted an incomplete, inaccurate, misrepresentative (under penalty of perjury) app. for demolition but it is invalid as incomplete and he did NOT notarize it. LADBS.org clearly states: The department (LADBS) and City Planning require the Owner/Builder Declaration, Property Owner Affidavit and CEQA related declarations to be notarized as that validates the signature, ensuring the property owner is aware of the legal and environmental (CEQA) responsibilities associated with the permit. The city requires a "wet" notary stamp, without that the permit application is invalid. Thus the demolition was illegal. As a lawyer this owner/builder is held to perform at a higher bar and it is becoming apparent and clear that this lawyer is intentionally performing below the standard of the law and is operating AS IF HE IS ABOVE THE LAW. (7) Demolition Notification Ordinance, a citywide policy that requires public disclosure of demolitions planned for structures older than 45 years of age **WHY DO I KNOW THIS?** The requirements and procedure for notice were not performed and the community members did not receive notice which you will hear about from them. And he moved forward knowing he did not complete the CEQA process anyway.

And he illegally demolished the top floor of the 2nd story 100 yr home without permits one year before he made the App. to Demolish.

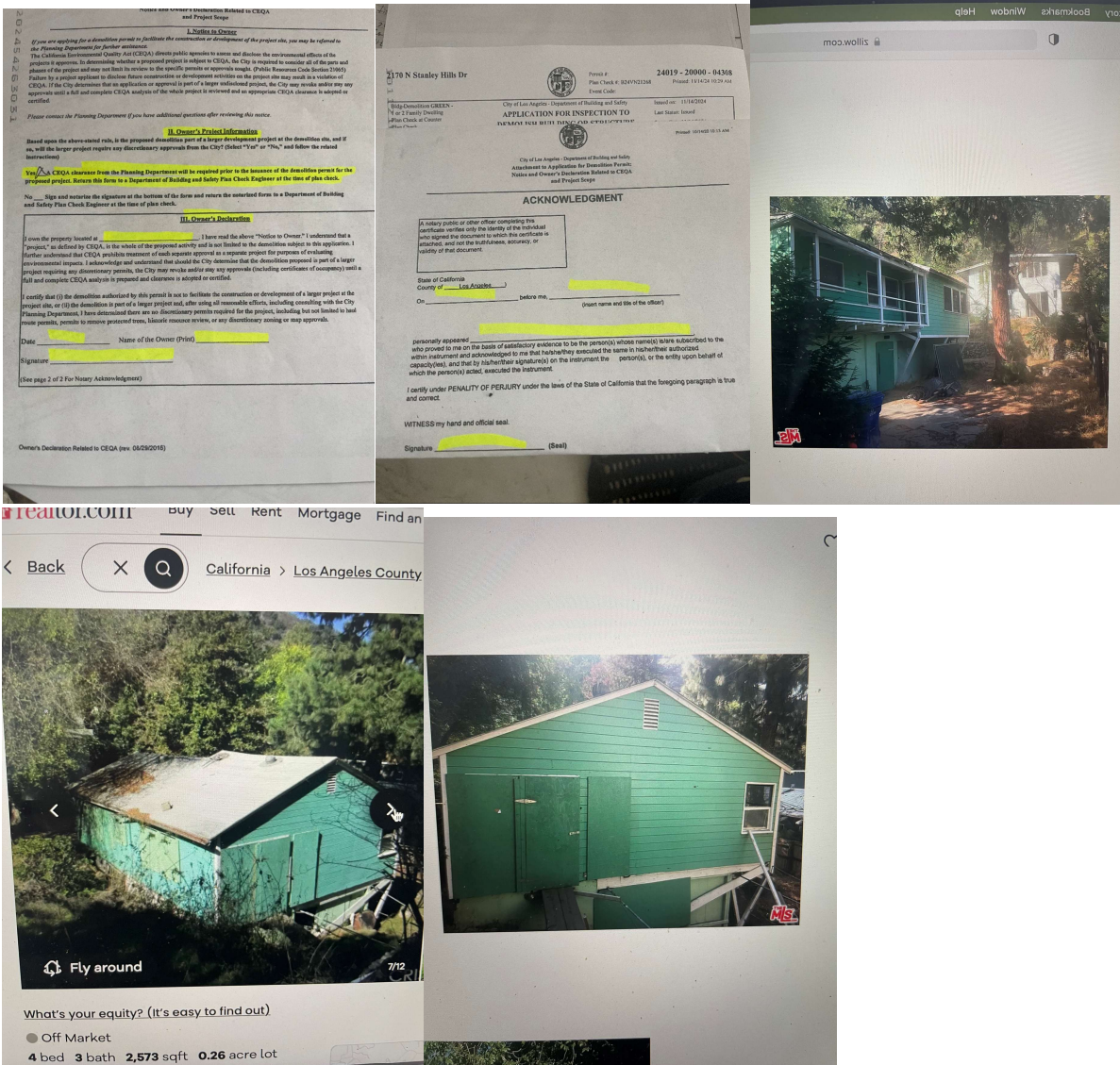
The remedy for these egregious and intentional acts is the Los Angeles 'Scorched Earth Ordinance' LAMCSection 91.106.4.1(10) which is a land-use policy enacted to penalize developers who demolish buildings without proper permits, particularly in historic or protected zones. This land is located in the Hillside Ordinance and has the highest level distinction (VERY HIGH FIRE HAZARD SEVERITY ZONE (VHFHSZ) and is within a 250 feet proximity to 2 designated wildlife lands. This Ordinance authorizes the DB&S to impose a FIVE year moratorium on any site where demolition occurred without proper permits. The pertinent reasons to do this is to punish and deter developers from defying city permit requirements and state environmental laws. This is an important tool for historic preservation to prevent developers from clearing sites to avoid environmental review or historic designation. **THE CITY MUST ENFORCE THIS SENDING THE MESSAGE TO ALL DEVELOPERS,** These egregious acts must stop and the buck stops here.

This lawyer/owner/builder is known to be bullish/bulldog litigator. **WHY DO I SAY THAT?** We appeared before the, Bel-Air Neighborhood Council (BANC) who expressed their concern to the applicant for lack of transparency and put on record for 2nd time to comply with answers to their serious questions which he refused. This lawyer/owner then venue shopped to the Planning Commission and at that hearing, Mr Jordann Turner, directed the app. to go back to BANC and address their concerns and questions by the end of the year 2025. Mr. Turner said he was skeptical granting because of the substandard street and the one/way/in/one/way/out. App. asked Turner if he would grant the app. if they agreed to just widening the front of the property and Turner emphatically said "NO" 2nd hearing the BANC voted, unanimously, against the project as the LOB (app) refused to answer the questions. At the next scheduled hearing of the BANC, we were told that it had been turned over to the City Attorney's office and they were silenced, and would not ratify the previous hearing's minutes, thus we were silenced. **WHY DID THE BULLY DO THAT?** Why did the Planning Commission approve his dangerous project and plan??? His threats/intimidation are working as people are afraid to speak. **THESE ARE NOT LOTS, THEY ARE A WOODLAND** (per Paul Edelman MRCA and SMMC) Woodland is a low- density open-canopy ecosystem dominated by trees and shrubs that allows significant sunlight to reach the ground, acting as a traditional habitat between forests and grasslands, a herbaceous layer, providing vital, varied wildlife habitat. The photos of the over 150 yr-old trees (towering 200-300 feet) show they live unsustained, with no irrigation, because of the "perennial stream" " The woodland is less than 250 feet proximity away from the MRCA's and LCLT's 26 protected acres in a 50 acre habitat block to the west. This proximity to large habitat blocks both to the west and east significantly adds to the ecological value of the woodland that includes the 2 proposed homes. "Quote" from Paul Edelman letter of Nov. 2025, Chief of Natural

Resources and Planning of MRCA and Deputy Director of the Santa Monica Mountains Conservancy (SMMC) This lawyer/owner/builder says "the trees gotta go"

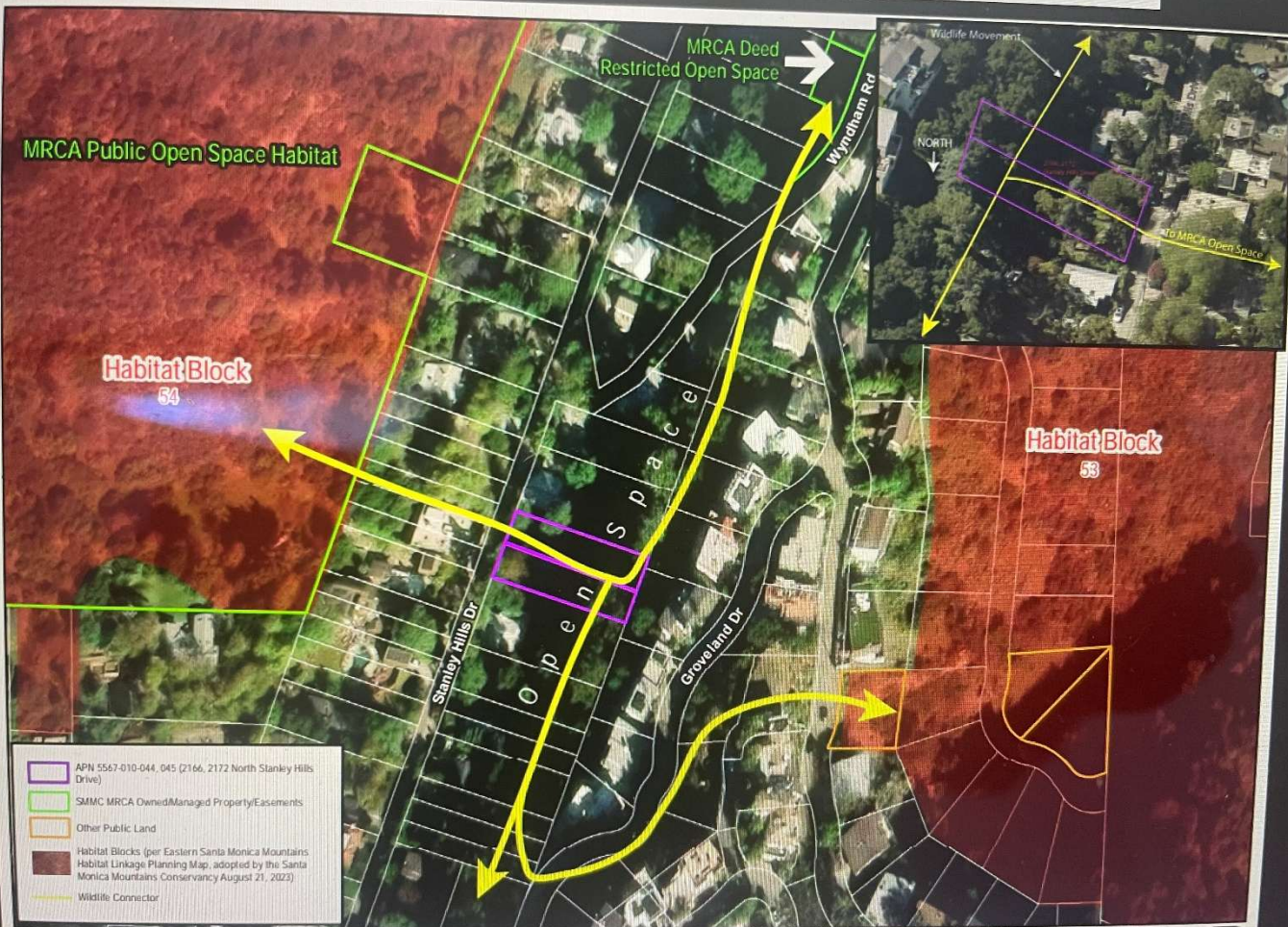
All eyes are watching as this is a pivotal decision that will affect not only the famous "for song, movies and glory) Laurel Canyon, but all encompassing LA, State of California and the world. We are a determined group and we plan to use the social media platform as a tool to garner awareness and support with all applicable actions available to us. We look for your wise and ethical decision which we hold you, as a commission, to the highest regard. THE BUCK MUST STOP HERE and the decision is in your hands.

You have the authority to STOP THIS unconsciousable project, and your decision will be on your conscience forever what may that bring? Thank you, Sandra Will Carradine. Concerned Citizen of Laurel Canyon and the "world"



1923 Historic House (2 story) and 1950 cultural green home in front. The applicant illegally demolished the 2nd floor BEFORE applying for a permit to demolish.

<https://www.gofundme.com/f/save-laurel-canyons-historic-trees-s4jan>



Case Nos:
 ZA-2024-6711-CU1-HCA, ENV-2024-6712-CE, 2172 North Stanley Hills Drive
 ZA-2025-1386-CU1-HCA, ENV-2024-6712-CE, 2166 North Stanley Hills Drive



Dear Planning Commission,

Isn't it hard to justify allowing the continuing destruction of one of the most historical canyons in the Hollywood Hills? Laurel Canyon is a storied community, known throughout the world for the legendary artists that lived here and drew inspiration from the nature and wildlife, the views and the light, the tree canopy of the pines, the oaks, the sycamores - the quietude.

I grew up in our family's house on Stanley Hills Drive, my daughter now lives there. Over my lifetime I have witnessed changes to the overbuilding the city continues to allow which deeply affects the residents of this hillside community. It has been designated a ***Very High Fire Severity Zone, as the Planning Commission is aware.***

Stanley Hills Drive is a vital exit route for the 1,500 homes above us - it is the only way out of the canyon in the event of a fire blocking Lookout at Wonderland. That seems like a huge liability for the city - ***that opposition by the residents was ignored and that laws were not followed.*** Insurance carriers continue to not insure us due the extreme probability of loss as fires become more likely here.

Stanley Hills is barely 18' wide and there are cars parked on one side, One construction vehicle in the street can cause a total gridlock. It will be impossible for residents to exit in an emergency while firetrucks are trying to get in.

This builder plans on removing/destroying all the trees including an irreplaceable California Redwood that is considered to be one of the oldest in the canyon; which is thriving due to an underground stream way that exists on the property. Please note:

CEQA **(also see:** Opposition to 2166 and 2172 Stanley Hills Drive - Inadequate Biological CEQA Review ZA-2025-1386-CU-HCA and ZA-2024-6711-CU-HCA)

Allowing the builder to skirt the law, bend the rules, endanger the neighborhood, all of it to make as much money as possible, and move on to the next project. Stating that they are building a house with a small adjacent house for their mother; that same line is being used all over and over - it's ridiculous, there are no sidewalks, it is totally unsafe to walk on this narrow very steep street.

This builder has already blatantly ignore the law and created a serious health hazard to the whole neighborhood with the illegal hazardous removal of the **asbestos discovered on the property. We believe there should be a minimum of a five year moratorium for that builder on any building (as has been imposed on other builders who ignored the law and endangered the residents).**

I will attend the hearing in person on Tuesday 04/14/2026

Sincerely,

Sandy Bolbat Patten
2160 Stanley Hills Drive
Los Angeles, CA 90046



2172 and 2166 Stanley Hills Dr. (ZA-2025-1386-CU-HCA and ZA-2024-6711-CU-HCA) Inbox

1 message

Kim Gottlieb-Walker <kingottliebwalker@gmail.com>
To: "apccentral@lacity.org" <apccentral@lacity.org>

Tue, Apr 14, 2026 at 1:04 PM

Dear Planning Commission,

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The LAW which states there can be no new construction on streets under 20' wide is there for a reason! Our lives are literally at stake in an emergency. This neighborhood has been **designated by the fire department as a EXTREMELY HIGH FIRE DANGER AREA** and too close proximity of houses dramatically increases the danger of swiftly spreading fires. **The proposed construction would add TWO houses that would be in too close proximity to the neighboring homes, and the plans do not show adequate spacing. The proposal also requires over the 750 allowable cubic feet of earth to be removed.**

Compounding this, **without the REQUIRED notification to each resident** that there would be demolition of an over 100 year old house on that property (that had been deserted for over 50 years)

The builder, in the middle of the night, brought unprotected workers to tear it down - a serious health hazard for the entire area that will manifest for decades to come, and the contaminated remains of the house were apparently taken to a dump not appropriate for hazardous material. The remaining earth is likely also contaminated (an L.A. Times article recently revealed the depth of the asbestos problem after the houses were destroyed in the Palisades and Eaton fires).

This blatant disregard for the law, and for the health and safety of the entire neighborhood, should be punished with a minimum of a five year moratorium for that builder on any building **(as has been imposed on other builders who ignored the law and endangered the residents)**. And that doesn't even address his liability for the health issues which may arise as a result of his irresponsible actions.

On top of that, **the slope of the street exceeds what is allowable for building**, and it would be impossible for the builder to widen the street all the way down to the nearest 20' street (Lookout Mountain) without tearing down existing homes and garages which were built within a foot of the street, and **chopping down several old growth trees (giant pines and a redwood, over 100' tall which are irreplaceable)**, important to the ecology of Laurel Canyon, where our raptor hawks and owls, who maintain the balance of nature controlling the rodent population, live and perch.
(also see: Opposition to 2166 and 2172 Stanley Hills Drive - Inadequate Biological CEQA Review ZA-2025-1386-CU-HCA and ZA-2024-6711-CU-HCA)

There is no way that the law should be ignored any longer. Laurel Canyon and Stanley Hills Dr are a fragile and vulnerable community. The devastating recent fires proved how vulnerable canyon homes are and how important those laws are to preserving both life and property. This builder has ignored the laws already, and endangered us all, and should not be allowed to continue ignoring the rules and regulations that protect our lives.

We urge the planning commission to deny this project in its entirety and recommend consequences for the unscrupulous builder, whose only concern is turning a profit, at the expense of our health and safety.

Thank you to the council for listening to our urgent concerns.
The Walker Family
Kim, Jeff, Ethan, and Rachel
2157 and 2161 Stanley Hills Dr

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Appeal Hearing Brief in Support of the Zoning Administrator's Determination 2172 North Stanley Hills Drive

Project Address:	2172 North Stanley Hills Drive	Case Number:	ZA-2024-6711-CU1-HCA
Environmental File:	ENV-2024-6712-CE	APN:	5567-010-044
Legal Description:	Lot 161, Bungalow-Land Tract	Decision Date:	February 3, 2026
Prepared For:	Stanley Family Residence LLC	Appellant:	Jeff Walker / Concerned Citizens of Stanley Hills Drive

Record citations use the following shorthand: "LOD" means the February 3, 2026 Letter of Determination; "Appeal Application" and "Appeal Justification" mean the February 18, 2026 appeal papers.

I. INTRODUCTION AND REQUESTED ACTION. Appellant asks the Commission to overturn the February 3, 2026 Zoning Administrator determination for 2172 North Stanley Hills Drive, including the hillside relief and CEQA exemptions. The appeal should be denied and the Letter of Determination ("LOD") sustained in full because the City did not grant a blanket safety waiver. Instead, it denied relief from the Adjacent Minimum Roadway requirement, required frontage dedication and roadway improvement along Stanley Hills Drive, granted only limited relief from the separate offsite Continuous Paved Roadway extension, and imposed extensive safety, traffic, fire, geology, and construction conditions. (LOD 1-4, 17-19.)

II. THE RECORD SUPPORTS THE ZA'S SPLIT RULING. This case concerns a vacant 5,625-square-foot lot proposed for a new 2,338-square-foot, two-story single-family residence with an attached two-car garage, pool, spa, and retaining walls, with approximately 437/322 cubic yards of cut/fill. The parcel fronts Stanley Hills Drive, a substandard hillside limited street with a 20-foot right-of-way but only 18 feet of pavement. BOE required an 8-foot dedication and frontage improvement along the subject property. The record also includes a June 18, 2024 arborist report addressing six protected Coast Live Oaks, a biological declaration finding no impact on onsite trees or biological resources, and permit history showing demolition of the former house. The LOD further notes the February 18, 2025 lot-line adjustment and similar roadway-relief precedent nearby at 2123 North Groveland Drive. (LOD 7-9, 13, 18-19.)

The City expressly denied relief from LAMC section 12.21 C.10(i)(2) because the owner controls approximately 75 feet of combined frontage on the two companion lots and can provide roadway widening adjacent to the sites. It granted only limited relief from section 12.21 C.10(i)(3) because strict compliance would require widening roadway segments hundreds of feet offsite, across third-party land, with effects on existing structures, landscaping, and mature trees, and would make the infill homes effectively unbuildable due to an impossible offsite condition. That is a reasoned application of the Hillside Ordinance, not arbitrary favoritism. (LOD 17-19.)

The administrative record also reflects substantial public process. The LOD notes ten opposition letters, including letters from the Laurel Canyon Association and the Santa Monica Mountains Conservancy, and records that the Bel Air-Beverly Crest Neighborhood Council Planning & Land Use Committee requested a 90-day hold. (LOD 9.) But public controversy does not substitute for legal or factual error, and the Commission should decide the present 2025-2026 record rather than superseded project configurations or parcel identifiers recycled from older disputes.

III. THE SAFETY ARGUMENTS DO NOT SHOW REVERSIBLE ERROR. The appeal treats the LOD as if it preapproved all later fire, grading, and engineering issues. It did not. The LOD states that it is not a permit or license and that all other required approvals must still be obtained. Condition 1 requires compliance with all other applicable laws; other conditions require BOE roadway permits, Fire Department review before plan sign-off, compliance with the April 30, 2025 DBS geology/soils approval letter, interior sprinklers, fire-retardant landscaping, a LADOT-approved Hillside Development Construction Traffic Management Plan, flag persons, neighborhood contact procedures, street-repair bonding, and Red Flag no-parking compliance. (LOD 2-4, 12, 17, 19-20.) Appellant identifies no finding by BOE, LAFD, or DBS that this conditioned project cannot obtain later code approvals. At most, the appeal raises permit-level issues for continued agency review, not a basis to overturn the ZA's limited land-use determination.

IV. THE CEQA EXEMPTIONS WERE PROPER. The LOD found the project exempt under CEQA Guidelines sections 15303 and 15332 and found no substantial evidence supporting any exception under section 15300.2. (LOD 1.) That analysis is supported by the record. This is one new residence on an approximately 5,625-square-foot lot in an existing single-family neighborhood within the City, and the LOD finds the project is infill housing that will not create significant adverse impacts on street access or circulation or alter permitted density or neighborhood

character. (LOD 7, 14, 16-17.) The appeal largely ignores the independent Class 32 infill basis and instead recycles generalized objections and older materials directed at materially different 2013-2015 proposals for 2170/2172, including older APNs and a then-hypothetical lot-line adjustment that has since been approved. (Appeal Justification 8-9, 14, 42; Appeal Application 1; LOD 8-9.) That is not substantial evidence of a CEQA exception for the project actually before the Commission.

Nor do the Conservancy's location-based or scale-based objections defeat the exemptions. The current record contains project-specific contrary evidence: the June 18, 2024 arborist report identifies six protected Coast Live Oaks, prescribes protection measures, and states that grading and construction will not encroach within the Oaks' dripline; the LOD separately states that the project submitted a biological declaration showing no impact on onsite trees or biological resources. (LOD 7, 12-14.) Generalized environmental concern, neighborhood controversy, or a preference for a smaller project does not defeat a categorical exemption without substantial evidence of a recognized exception in the record. See *Berkeley Hillside Preservation v. City of Berkeley* (2015) 60 Cal.4th 1086; *Berkeley Hills Watershed Coalition v. City of Berkeley* (2019) 31 Cal.App.5th 880.

V. THE LOD REFLECTS A BALANCED, HIGHLY CONDITIONED APPROVAL. This was not a rubber-stamp approval. The City denied the adjacent-roadway waiver; required BOE permits and frontage improvement; required an 8-foot dedication and street-repair bonding; required Fire Department review and DBS geology/soils compliance; required interior sprinklers, fire-retardant landscaping, an LADOT-approved construction traffic plan, flag persons, neighbor contact information, and Red Flag no-parking compliance. (LOD 2-4, 16-19.) Those conditions are the hallmarks of a record-sensitive determination and are impossible to square with appellant's portrayal of an uncontrolled project.

VI. ANY BABCNC ISSUE IS ANCILLARY. The appeal fails on the merits without reaching Neighborhood Council issues. If the Commission addresses them at all, it should do so narrowly. The LOD records only that the Bel Air-Beverly Crest Neighborhood Council Planning & Land Use Committee requested a 90-day hold; it does not identify a formal Board appeal position. (LOD 9.) The appeal application itself was filed by Jeff Walker checking "Self," not as an authorized Neighborhood Council representative. (Appeal Application 2.) Any challenged title-based remarks therefore should receive only the weight supported by the record as individual public comment.

CONCLUSION. Because the February 3, 2026 determination required every roadway improvement the applicant can actually provide, preserved later agency review, imposed extensive safety and construction conditions, and reasonably applied both the Hillside Ordinance and CEQA, the Commission should deny the appeal and sustain the LOD in full.

Appeal Hearing Brief in Support of the Zoning Administrator's Determination 2166 North Stanley Hills Drive

Project Address:	2166 North Stanley Hills Drive	Case Number:	ZA-2025-1386-CU1-HCA
Environmental File:	ENV-2024-6712-CE	APN:	5567-010-045
Legal Description:	Lot 162, Bungalow-Land Tract	Decision Date:	February 3, 2026
Prepared For:	Stanley Family Residence LLC	Appellant:	Jeff Walker / Concerned Citizens of Stanley Hills Drive

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Note: although the first page of the companion LOD appears to contain an address typo, the case number, APN 5567-010-045, legal description, findings, and appeal papers confirm that this case concerns 2166 North Stanley Hills Drive.

I. INTRODUCTION AND REQUESTED ACTION. Appellant asks the Commission to overturn the February 3, 2026 Zoning Administrator determination for 2166 North Stanley Hills Drive, including the hillside relief and CEQA exemptions. The appeal should be denied and the Letter of Determination ("LOD") sustained in full because the City did not grant a blanket safety waiver. Instead, it denied relief from the Adjacent Minimum Roadway requirement, required frontage dedication and roadway improvement along Stanley Hills Drive, granted only limited relief from the separate offsite Continuous Paved Roadway extension, and imposed extensive safety, traffic, fire, geology, and construction conditions. (LOD 1-4, 17-19.)

II. THE RECORD SUPPORTS THE ZA'S SPLIT RULING. This case concerns a vacant 5,625-square-foot lot proposed for a new 2,091-square-foot, two-story single-family residence with an attached two-car garage, pool, spa, and retaining walls, with approximately 410/320 cubic yards of cut/fill. The parcel fronts Stanley Hills Drive, a substandard hillside limited street with a 20-foot right-of-way but only 18 feet of pavement. BOE required an 8-foot dedication and frontage improvement along the subject property. The record also includes a June 18, 2024 arborist report addressing six protected Coast Live Oaks, a biological declaration finding no impact on onsite trees or biological resources, and permit history showing demolition of the former house. The LOD further notes the February 18, 2025 lot-line adjustment and similar roadway-relief precedent nearby at 2123 North Groveland Drive. (LOD 7-9, 13, 18-19.)

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III. THE SAFETY ARGUMENTS DO NOT SHOW REVERSIBLE ERROR. The appeal treats the LOD as if it preapproved all later fire, grading, and engineering issues. It did not. The LOD states that it is not a permit or license and that all other required approvals must still be obtained. Condition 1 requires compliance with all other applicable laws; other conditions require BOE roadway permits, Fire Department review before plan sign-off, compliance with the April 30, 2025 DBS geology/soils approval letter, interior sprinklers, fire-retardant landscaping, a LADOT-approved Hillside Development Construction Traffic Management Plan, flag persons, neighborhood contact procedures, street-repair bonding, and Red Flag no-parking compliance. (LOD 2-4, 12, 17, 19-20.) Appellant identifies no finding by BOE, LAFD, or DBS that this conditioned project cannot obtain later code approvals. At most, the appeal raises permit-level issues for continued agency review, not a basis to overturn the ZA's limited land-use determination.

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