MIRAMAR HOMEOWNERS ASSOCIATION

Pacific Palisades, California · Founded 1947

August 13, 2026

Honorable Members of the Los Angeles City Council
c/o Office of the City Clerk, Council and Public Services Division
200 North Spring Street, Room 395, Los Angeles, CA 90012

Re: Council File 25-0600-S86, Item 2, Council Agenda of August 14, 2026
Objection to Recommendation No. 2 as to four parcels on Paseo Miramar and Lucero Place

Dear Council President Harris-Dawson and Members of the Council:

The Miramar Homeowners Association, founded in 1947 and the oldest homeowners association in Pacific Palisades, submits this written comment for the administrative record and objects to Recommendation No. 2 of Item 2 as it applies to four parcels on our hillside.

All eighteen parcels proposed for declaration as Surplus Land under Recommendation No. 2 are located in Pacific Palisades, 90272, as is one of the six parcels in Recommendation No. 1. The Community Impact Statement for this item reads "None submitted." No Palisades community organization was notified that the City proposed to begin disposing of its land holdings in this community, seven months after the fire that destroyed much of it.

The Association respectfully asks that the Council continue this item pending consultation with the affected communities, or in the alternative strike the following four parcels from Recommendation No. 2:

418 North Paseo Miramar, APN 4416-007-904
418 North Paseo Miramar, APN 4416-007-903
412 Paseo Miramar, APN 4416-007-905
500 North Lucero Place, APN 4416-007-902

1. This land is not developable, and the City's own records establish it.

Attachment B to the June 4, 2026 Municipal Facilities Committee report codes these four parcels "Developable, total of 2 residences." The stated basis for that determination is a 2026 appraisal. An appraisal is a valuation instrument. It cannot establish slope stability. The Department of General Services' own entry for 412 Paseo Miramar records the recommendation to review the site for a single-family home and notes that a "Geotech or other analysis may be required." No such analysis appears anywhere in the record.

An active landslide underlies these parcels. It is approximately 100 feet in depth and it continues to move. Geotechnical findings documenting it exist, are held by the Association, and are known to the City. The Association will provide them on request.

The City acquired these very parcels through inverse condemnation settlements arising from that movement. Attachment B states this on its face for each parcel, and the report confirms at page 4 that

most Council District 11 properties on this list "were acquired as a result of legal settlements due to land movement issues."

At its meeting of March 26, 2026, the Municipal Facilities Committee directed General Services to "separate properties on hillsides that are not considered buildable." General Services carried out that instruction for other parcels, which appear at the bottom of Attachment B identified as undevelopable. These four parcels were instead placed in Priority Band 1, at the top of the City's sale queue, among its most valuable properties. The City proposes to sell as buildable, and at premium value, land it purchased because it moves.

2. No written findings support this declaration.

The Surplus Land Act, as the Municipal Facilities Committee report itself states at page 5, requires that land "shall be declared either 'surplus land' or 'exempt surplus land,' as supported by written findings, before a local agency may take any action to dispose of it."

The report's Findings section provides a full statutory analysis for the six parcels in Recommendation No. 1, citing Government Code section 54221(f)(1)(B) and addressing each disqualifying characteristic. For the eighteen parcels in Recommendation No. 2 it provides a list of addresses and nothing further. The only stated basis for these four parcels appears in Attachment B: "This property was acquired through a settlment resulting from an inverse condemnation claim. Okay to declare Surplus." (Spelling as in the original.)

Recommendation No. 2 asks the Council to declare these parcels surplus "as supported by the Findings set forth in the June 4, 2026 MFC report." As to these parcels, no such findings exist.

3. The parcels are subject to an open space commitment the report does not disclose.

From 2016 the Association worked with the City, then represented by Councilmember Bonin, and with the Mountains Recreation and Conservation Authority to place open space easements over these same four assessor parcel numbers. On December 4, 2019, the MRCA Governing Board considered Agenda Item XI, a resolution authorizing acceptance of revocable open space easements from the City over all or parts of them. The MRCA staff report records that the City took ownership after a legal action regarding land slippage, that the Association had worked with the City since 2016 toward conservation or open space easements in favor of another public entity, and that the corresponding City motion was moving through the Council approval process.

The Association funded that work at substantial cost to its members. In the years following, the Association was advised that the matter remained pending and awaited a single remaining approval. At no point was the Association informed that the easement process had been abandoned, or that these parcels were instead under consideration for sale.

Neither the easements nor the MRCA appear anywhere in the 161-page Municipal Facilities Committee report, although General Services identifies MRCA and Santa Monica Mountains Conservancy interests in other parcels within the same attachment.

4. The parcels lie on a street that cannot evacuate the homes it already has.

Paseo Miramar is the sole ingress and egress for this hillside and dead-ends at the East Topanga Fire Road trailhead. Its only connector between the lower and upper street, Resolano Drive, is 15 to 20 feet

wide, remains officially temporary, is too narrow and too steep for reliable fire apparatus access, and is posted no-stopping along its entire length for that reason.

On January 7, 2025, roughly half the homes on this hill were lost. These are City-owned lots. Residents rebuilding existing homes have no alternative. The City is choosing to add new households to a street with an unresolved evacuation problem.

5. The Surplus Land Act provides a better outcome.

Government Code section 54222 requires that surplus land be offered first to public agencies and to park and open-space entities. General Services has already coded two of these four parcels "Surplus - Coastal - SMMC" in Attachment B. Conveyance to a conservation agency resolves the City's maintenance and liability exposure and completes what was begun in 2016.

Requests

a. Continue Item 2 pending consultation with the affected communities, or in the alternative strike these four parcels from Recommendation No. 2.

b. Direct General Services to obtain a current geotechnical assessment of these parcels before any declaration, and enter the Association's existing findings into the record.

c. Direct that the Government Code section 54222 notices for these parcels issue to the Mountains Recreation and Conservation Authority, the Santa Monica Mountains Conservancy, and the California Department of Parks and Recreation, with Council District 11 supporting conveyance to whichever entity responds.

d. Report whether the MRCA open space easements were recorded, and if not, at what point the process stopped.

The Association requests that this correspondence be entered into the administrative record for this matter.

Respectfully submitted,

Kathrin Werner
Co-Chair, Miramar Homeowners Association

cc: Councilwoman Traci Park, Council District 11
Arus Grigoryan, Office of Council District 11
Municipal Facilities Committee