

## Communication from Public

**Name:** Barry Oberman  
**Date Submitted:** 05/05/2026 12:52 PM  
**Council File No:** 26-0412  
**Comments for Public Posting:** Please see the attached letter.

Barry Oberman  
4207 Alhama Dr.  
Woodland Hills, CA 91364

May 5, 2026

Los Angeles City Council  
Planning and Land Use Management Committee 200 North Spring Street  
Los Angeles, CA 90012  
clerk.cps@lacity.org Clerk.PLUMCommittee@lacity.org

**Re: Support for CEQA Appeal; 4230 N. Saltillo Street;  
Case Nos.: ZA-2023-1206-ZAD-DRB-SPP-MSP-HCA; ENV-2023-1207-  
CE; Council File No. 26-0412 (“Project”)**

To the Attention Of: L.A. City Council and Plum Committee.

My name is Barry Oberman. I live at 4207 Alhama Drive in Woodland Hills. My house is above the proposed development at 4230 Saltillo Street.

This proposal to build on this lot would be disturbing to the environment of this entire area of the Girard Tract. Allowing this project to proceed without an Environmental Impact report and giving a CEQA exemption is in disregard to the laws that protect this community.

Please revoke the CEQA clearance and require the preparation of an appropriate Environment Review Document.

Respectfully,

Barry Oberman

## Communication from Public

**Name:** Girard Tract Community Preservation  
**Date Submitted:** 05/05/2026 12:54 PM  
**Council File No:** 26-0412  
**Comments for Public Posting:** Please see the attached letter.

May 5, 2026

Los Angeles City Council  
Planning and Land Use Management Committee 200 North Spring Street  
Los Angeles, CA 90012  
clerk.cps@lacity.org Clerk.PLUMCommittee@lacity.org

**Re: Support for CEQA Appeal; 4230 N. Saltillo Street;  
Case Nos.: ZA-2023-1206-ZAD-DRB-SPP-MSP-HCA; ENV-2023-1207-CE; Council File No.  
26-0412 (“Project”)**

To Whom It May Concern,

The **Girard Tract Community Preservation** is writing to express concern regarding the proposed development at 4230 N.Saltillo Street in Woodland Hills.

- This site presents a combination of constraints that should not be overlooked. It is a small hillside lot with a concentration of mature oak trees that have long been part of the natural landscape in this area. These trees contribute to shade, temperature regulation, and the overall environmental balance of the neighborhood.
- The proposal to remove oak trees and reshape the site introduces a number of concerns. Changes of this scale on a slope can alter how water flows through the land, reduce natural cooling, and affect the stability of the surrounding area. Once these conditions are changed, they are difficult to reverse.
- This neighborhood also functions as part of a larger natural system. Wildlife regularly moves through this area, and the existing tree canopy plays a role in supporting that movement and habitat.
- There are also practical considerations. The surrounding streets are narrow and located within a high fire risk zone. Construction on a constrained hillside lot adds pressure to access, safety, and emergency response conditions that are already limited.

Given these factors, this project does not appear appropriate for a streamlined or exempt approval process. The combination of environmental sensitivity, fire risk, and site limitations warrants a more thorough level of review.

We also encourage the City to consider how decisions like this are applied more broadly. Allowing exceptions on lots with similar constraints can gradually change the character and safety of hillside communities. Existing protections are in place to prevent that type of incremental impact.

Approving this project without full environmental review risks overlooking impacts that are already evident to those living here.

We appreciate your consideration.

Sincerely,

**Girard Tract Community Preservation**  
Woodland Hills CA 91364

## Communication from Public

**Name:** James W. Bowman  
**Date Submitted:** 05/05/2026 01:00 PM  
**Council File No:** 26-0412  
**Comments for Public Posting:** Please see the attached letter.

James W. Bowman  
21380 Castillo Street  
Woodland Hills, CA 91364  
jimbowman@aol.com

May 4, 2026

Los Angeles City Council  
Planning and Land Use Management Committee  
200 North Spring Street  
Los Angeles, CA 90012  
clerk.cps@lacity.org  
Clerk.PLUMCommittee@lacity.org

**Re: Support for CEQA Appeal; 4230 N. Saltillo Street;  
Case Nos.: ZA-2023-1206-ZAD-DRB-SPP-MSP-HCA; ENV-2023-1207-CE;  
Council File No. 26-0412 (“Project”)**

Dear City Council and PLUM Committee Members:

My name is James W. Bowman. I am a 28 year resident of Woodland Hills. As a concerned member of the local community, I am writing to strongly urge you to grant the California Environmental Quality Act (“CEQA”) appeal filed by Girard Tract Community Preservation (“Appellant”) regarding the proposed development at 4230 N. Saltillo Street (“Project”).

Our neighborhood is located within a designated high fire severity zone, an area already vulnerable to wildfire risk. The existing infrastructure—particularly our narrow, winding streets—is insufficient to safely accommodate current traffic levels, let alone the increased congestion that additional development would bring. In the event of a wildfire emergency, such as those recently experienced in nearby areas, these limitations could significantly hinder evacuation efforts and impede access for emergency responders. The safety implications alone warrant serious reconsideration of this project.

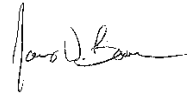
Additionally, the proposed construction would necessitate the removal of numerous mature oak trees. These trees are not only environmentally valuable but are also protected under the Mulholland Scenic Parkway guidelines. Their removal would undermine established conservation protections and diminish the natural character and ecological integrity of the area.

The surrounding habitat supports a diverse range of wildlife, including mountain lions, coyotes, raccoons, rabbits, and other species. Increased development and habitat disruption would inevitably impact these populations, further contributing to the loss of biodiversity in an already sensitive ecosystem.

For these reasons—public safety concerns, environmental protections, and preservation of wildlife habitat—I respectfully urge the City to deny approval of this proposed development. Thoughtful stewardship of our community requires prioritizing safety, sustainability, and adherence to established environmental guidelines.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "James W. Bowman". The signature is written in a cursive style with a vertical line on the left side.

James W. Bowman

## Communication from Public

**Name:** Joy Tangarone  
**Date Submitted:** 05/05/2026 01:02 PM  
**Council File No:** 26-0412  
**Comments for Public Posting:** Please see the attached letter.

Joy Tangarone  
4201 Esteban Road  
Woodland Hills, Ca. 91364

May 2, 2026

Los Angeles City Council  
Planning and Land Use Management Committee  
200 North Spring Street  
Los Angeles, CA 90012  
clerk.cps@lacity.org  
Clerk.PLUMCommittee@lacity.org

Re: Support for CEQA Appeal; 4230 N Satillo Street

Case Nos: ZA-2023-1206-ZAD-DRB-SPP-MSP-HCA; ENV-2023-1207-CE; Council File No. 26-0412 ("Project")

Dear City Council and PLUM Committee Members:

My name is Joy Tangarone and I am a resident of the Woodland Hills neighborhood where this project is listed. I am writing to ask you to grant the CEQA appeal filed by the Girard Tract Community Preservation ("appellant") regarding the proposed development at 4230 N. Satillo Street. The project is a public safety threat to our neighborhood as well as the wildlife and environmental resources in the area.

We all know the devastation of wildfires and that this area is listed as a "high fire hazard severity zone". The importance of proper evacuation routes as well as fire safety regulations are followed by residents who live here as we work together to keep our community safe. This project fails to meet State Minimum Fire Safe Regulations as the primary access routes on Satillo do NOT meet the required 20 foot minimum. There is also NO parking anytime on this single lane road which does NOT even have street lights. There is no way a construction team can build this proposed project without endangering residents as there is NO parking anytime on N. Satillo St. The surrounding streets like Golondrina, Alhama and many others in this commonly referred to "spaghetti hill" area also have no parking as well as restricted parking. The homes on Satillo all sit on top of the land and this is a project that is wanting to dig up the hill below large homes on Alhama and remove a very large amount of the land for a home that is not sized to fit this area. If a developer can't park on the lot and keep the roads clear it is a safety concern anywhere let alone in our neighborhood with substandard streets. There are also no curbs and gutters in this old infrastructure so all the mud, concrete mixing, clean up and debris washes down the street into our neighborhood.

The other issue I have with any CEQA exemption is that the property is located within the Santa Monica Mountain Zone, Mulholland Scenic Corridor and Girard Tract where the regulation specifics are there for a reason, so just like any other resident who lives here and wants to remodel, these need to be followed. The Coast Live Oaks are protected trees and this lot has beautiful mature oaks holding the hillside and providing a canopy for the oak titmouse birds and other wildlife. The tree roots are connected and it is detrimental to the environment to remove the number needed to build a proposed oversized plan for a three story house with pool and parking for four cars. This same developer was warned of the damage to the Oak trees on a build taking place on Tosca Rd. They cut trenches too close to roots and during the winds and rains this past winter one of the mature large oaks fell over and damaged neighbors lot. It is important to look at this property lot and be sure any plan for it has full EIR reports, CEQA clearance and is sized correctly for our neighborhood. I am requesting that you will grant the appeal, revoke the CEQA clearance and require the preparation of an appropriate environmental review.

Sincerely,

Joy Tangarone



## Communication from Public

**Name:** Justin Stafford  
**Date Submitted:** 05/05/2026 01:06 PM  
**Council File No:** 26-0412  
**Comments for Public Posting:** Please see the attached letter.

May 3rd 2026

LA City Council  
Planning and Land Use Management Committee  
200 N. Spring St  
LA, CA 90012

RE: Support for CEQA Appeal; 4230 Saltillo St.  
Case Nos: ZA -2023-1206-ZAD-DRB-SPP-MSP-HCA: ENV-2023-1207-CE;  
Council File NO.26-0412 ( Project)

Dear City Council and PLUM Committee Members,

My name is Justin Stafford, I own the property 4215 Saltillo St. Ive been in the property about 1 year. I found out about the proposed construction at 4230 Saltillo approx. Dec 2025. I am writing to share/ include my concerns about this project. I share similar sentiments as my neighbors. I believe the location is not appropriate for this development. The entire area and surrounding streets are quite narrow. The proposed construction duration of 16 months will be disruptive to the area. The streets in the area are designated no parking from the city and any parking will render some areas of the street impassable. Construction crews and trucks etc will block streets causing ongoing issues that concern me. The proposed construction states to "widen the street" but even if that happens in that small section- the entire area and streets surrounding still remain narrow. Too narrow for 2 cars to pass at the same time. There are many neighbors that have been in their homes for many years and some are older people. If they need emergency services these obstructions could hinder any emergency response. If there is a large scale emergency and evacuation ,such as a fire , the area could be blocked delaying or trapping people or slowing/ preventing first responders. If a tragedy occurs the city will be liable as we have all communicated our concerns in writing.

The environmental impact will also be negatively affected by this development. There are numerous Oak trees that fill this hillside and will all potentially be destroyed by this. Their extensive root systems are probably interconnected and keep the hillside stable. I dont think this is an appropriate location for this project. I am asking that this not be approved for development.

Thank you,

Justin Stafford  
4215 Saltillo St  
Woodland Hills CA 91364

## Communication from Public

**Name:** Kris Kettenburg  
**Date Submitted:** 05/05/2026 01:09 PM  
**Council File No:** 26-0412  
**Comments for Public Posting:** Please see the attached letter.

Kris Kettenburg  
21205 Golondrina St.  
Woodland Hills, CA 91364

May 5, 2026

Los Angeles City Council  
Planning and Land Use Management Committee 200 North  
Spring Street  
Los Angeles, CA 90012  
clerk.cps@lacity.org Clerk.PLUMCommittee@lacity.org

**Re: Support for CEQA Appeal; 4230 N. Saltillo Street;  
Case Nos.: ZA-2023-1206-ZAD-DRB-SPP-MSP-HCA;  
ENV-2023-1207-CE; Council File No. 26-0412 (“Project”)**

Dear City Council and Plum Committee Members,

My name is Kris Kettenburg. I'm a resident of 21205 Golondrina st. Woodland hills. My property touches the corner of the proposed development on 4230 N Saltillo Street.

This proposal to build on a known, unbuildable lot, would be completely disruptive to the integrity of this Girard Neighborhood tract. Allowing this project to proceed without an Environmental impact report and giving a CEQA exemption seems to be in complete disregard to the laws that are supposed to protect this community.

Please revoke the CEQA clearance and require the preparation of an appropriate Environmental review document.

Thank You  
Kris Kettenburg

## Communication from Public

**Name:** Maricel Zabel  
**Date Submitted:** 05/05/2026 01:13 PM  
**Council File No:** 26-0412  
**Comments for Public Posting:** Please see the attached letter.

Maricel Zabel  
4153 Alhama Drive  
Woodland Hills, CA 91364  
[maricelz@pacbell.net](mailto:maricelz@pacbell.net)

May 4, 2026

VIA EMAIL AND ELECTRONIC UPLOAD

Los Angeles City Council  
Planning and Land Use Management Committee  
200 North Spring Street  
Los Angeles, CA 90012  
[clerk.cps@lacity.org](mailto:clerk.cps@lacity.org)  
[Clerk.PLUMCommittee@lacityorg](mailto:Clerk.PLUMCommittee@lacityorg)

**RE: Support for CEQA Appeal: 4230 N. Saltillo Street;  
Case Nos.: ZA-2023-1206-ZAD-DRB-SPP-MSP-HCA; ENV-2023-1207-CE;  
Council File No. 26-0412 ("Project")**

Dear City Council and PLUM Committee Members:

My name is Maricel Zabel. I am a resident of 4153 Alhama Drive, Woodland Hills, CA 91364. As concerned member of the local community for twenty five years, I am writing to strongly urge you to grant the California Environmental Quality Act appeal filed by the Girard Tract Community Preservation.

Major issues that require your thoughtful and full review:

1. Having lived through the Palisades Altadena and Malibu fires, the extremely narrow streets of area, this house will overwhelm us both during an extensive construction and after. The architect of this project estimated that just the construction would take eighteen months to two years. Will the fire department be able to get through when needed? The house itself will take up most of the extra small lot and it will tower over all the surrounding existing properties.
2. The trees of our Girard Tract that we have worked so long to protect, will need to be sacrificed to build this extremely large house vs the small property size. The architect claims this will not hurt the remaining trees, but who can guarantee it won't destroy the whole ecosystem. Half the hill will have to be dug out to build this house!
3. My home is directly above this project. I believe no one can guarantee there is no risk when excavating that much earth below will not destabilize the hill and homes above. In addition, my property has a permanent easement...will there be a guarantee that they will be able to honor it?
4. The scope of the project and the size of the property only show that the developer just wishes to maximize the square footage to achieve the maximum return on his investment. It shows no concern for the "look and feel" of our long standing community, which they will not be living in upon completion.

I leave with you my concerns that I believe are shared by those of who live and enjoy our community.

Sincerely,  
Maricel Zabel

## Communication from Public

**Name:** Erich Randolph  
**Date Submitted:** 05/05/2026 01:37 PM  
**Council File No:** 26-0412  
**Comments for Public Posting:** Please see the attached letter.

May 5, 2026

Los Angeles City Council  
Planning and Land Use Management Committee 200 North Spring Street  
Los Angeles, CA 90012  
clerk.cps@lacity.org Clerk.PLUMCommittee@lacity.org

**Re: Support for CEQA Appeal; 4230 N. Saltillo Street;  
Case Nos.: ZA-2023-1206-ZAD-DRB-SPP-MSP-HCA; ENV-2023-1207-CE; Council File No. 26-0412  
("Project")**

City Council and PLUM Committee Members:

We are writing as the homeowners directly next to the lot at 4230 N. Saltillo Street in the Woodland Hills and Topanga area.

Because we live right alongside this property, any changes there will impact us pretty directly. The lot is small, on a slope, and packed with mature oak trees. Those trees are not just part of the landscape. They are a big part of what is holding everything together on that hillside and creating some separation between properties.

We understand there is a plan to remove two of the oak trees. Even that feels significant given how tight the space is and how interconnected everything looks. From living next to it, it is hard to imagine removing any trees without affecting the others, whether that is through root disturbance, soil changes, or overall stability.

Our biggest concern is what this could mean for our home. We are right there on the slope, so any tree removal and grading or excavation raises real questions for us around erosion or ground movement. This is not just a general concern. It is something that could directly affect our property.

There is also the environmental side of this. We see animals moving through here all the time, including deer, coyotes, and recently even a mountain lion in our driveway. This area clearly functions as part of a natural corridor, and those oak trees play a role in that.

Beyond that, these trees do a lot day to day that is easy to take for granted. They provide shade that keeps this area noticeably cooler, especially during the hotter months, and they help with air quality and how water moves through the hillside when it rains. They have been here a long time, and once they are gone, they are not something that can realistically be replaced in any meaningful way.

We also understand there are environmental review considerations for a project like this, and given the number of concerns, including tree removal, slope conditions, and fire risk, we hope a more thorough review is required before anything moves forward.

We understand development happens, but this particular lot feels especially sensitive given its size, slope, and the number of large, mature trees on it. From where we sit, it does not seem like a situation where changes can be made without wider impact.

We ask that all of this is carefully considered before moving forward.

Thank you for your time and consideration.

Sincerely,  
Erich and Michelle Randolph

4224 Saltillo St.  
Woodland Hills CA 91364

## Communication from Public

**Name:** Barry Oberman  
**Date Submitted:** 05/05/2026 01:39 PM  
**Council File No:** 26-0412  
**Comments for Public Posting:** Please see the attached letter.

Barry Oberman  
4207 Alhama Dr.  
Woodland Hills, CA 91364

May 5, 2026

Los Angeles City Council  
Planning and Land Use Management Committee 200 North Spring Street  
Los Angeles, CA 90012  
clerk.cps@lacity.org Clerk.PLUMCommittee@lacity.org

**Re: Support for CEQA Appeal; 4230 N. Saltillo Street;  
Case Nos.: ZA-2023-1206-ZAD-DRB-SPP-MSP-HCA; ENV-2023-1207-  
CE; Council File No. 26-0412 (“Project”)**

To the Attention Of: L.A. City Council and Plum Committee.

My name is Barry Oberman. I live at 4207 Alhama Drive in Woodland Hills. My house is above the proposed development at 4230 Saltillo Street.

This proposal to build on this lot would be disturbing to the environment of this entire area of the Girard Tract. Allowing this project to proceed without an Environmental Impact report and giving a CEQA exemption is in disregard to the laws that protect this community.

Please revoke the CEQA clearance and require the preparation of an appropriate Environment Review Document.

Respectfully,

Barry Oberman

## Communication from Public

**Name:** Girard Tract Community Preservation  
**Date Submitted:** 05/05/2026 01:40 PM  
**Council File No:** 26-0412  
**Comments for Public Posting:** Please see the attached letter.

May 5, 2026

Los Angeles City Council  
Planning and Land Use Management Committee 200 North Spring Street  
Los Angeles, CA 90012  
clerk.cps@lacity.org Clerk.PLUMCommittee@lacity.org

**Re: Support for CEQA Appeal; 4230 N. Saltillo Street;  
Case Nos.: ZA-2023-1206-ZAD-DRB-SPP-MSP-HCA; ENV-2023-1207-CE; Council File No.  
26-0412 (“Project”)**

To Whom It May Concern,

The **Girard Tract Community Preservation** is writing to express concern regarding the proposed development at 4230 N.Saltillo Street in Woodland Hills.

- This site presents a combination of constraints that should not be overlooked. It is a small hillside lot with a concentration of mature oak trees that have long been part of the natural landscape in this area. These trees contribute to shade, temperature regulation, and the overall environmental balance of the neighborhood.
- The proposal to remove oak trees and reshape the site introduces a number of concerns. Changes of this scale on a slope can alter how water flows through the land, reduce natural cooling, and affect the stability of the surrounding area. Once these conditions are changed, they are difficult to reverse.
- This neighborhood also functions as part of a larger natural system. Wildlife regularly moves through this area, and the existing tree canopy plays a role in supporting that movement and habitat.
- There are also practical considerations. The surrounding streets are narrow and located within a high fire risk zone. Construction on a constrained hillside lot adds pressure to access, safety, and emergency response conditions that are already limited.

Given these factors, this project does not appear appropriate for a streamlined or exempt approval process. The combination of environmental sensitivity, fire risk, and site limitations warrants a more thorough level of review.

We also encourage the City to consider how decisions like this are applied more broadly. Allowing exceptions on lots with similar constraints can gradually change the character and safety of hillside communities. Existing protections are in place to prevent that type of incremental impact.

Approving this project without full environmental review risks overlooking impacts that are already evident to those living here.

We appreciate your consideration.

Sincerely,

**Girard Tract Community Preservation**  
Woodland Hills CA 91364

## Communication from Public

**Name:** Jeffrey Chan  
**Date Submitted:** 05/05/2026 01:42 PM  
**Council File No:** 26-0412  
**Comments for Public Posting:** Please see the attached letter.

**Jeffrey Chan**  
**21327 Las Pilas Rd**  
**Woodland Hills, CA, 91364**  
**madbullish@gmail.com**

May 3, 2026

**VIA EMAIL AND ELECTRONIC UPLOAD**

Los Angeles City Council  
Planning and Land Use Management (PLUM) Committee  
200 North Spring Street  
Los Angeles, CA 90012  
clerk.cps@lacity.org  
Clerk.PLUMCommittee@lacity.org

**Support for CEQA Appeal; 4230 N. Saltillo Street;**  
**Case Nos.: ZA-2023-1206-ZAD-DRB-SPP-MSP-HCA; ENV-2023-1207-CE;**  
**Council File No. 26-0412 (“Project”)**

Dear PLUM Committee Members and Honorable Council Members:

I am a resident of 21327 Las Pilas Rd and part of the Woodland Hills community and local neighborhood. I am writing to express my strong support to grant the California Environmental Quality Act “CEQA” appeal filed by Girard Tract Community Preservation regarding the proposed development at 4230 N. Saltillo Street. The City’s determination that this Project is categorically exempt from environmental review poses a direct threat to our community’s safety.

I urge you to grant the appeal based on the following violations and code-based inconsistencies:

- **Violations of State Fire Safe Regulations & LAMC Hillside Standards:** The Project is located within a **Very High Fire Hazard Severity Zone (VHFHSZ)**. According to **14 CCR § 1273.01**, all roads must provide a minimum of two ten-foot traffic lanes to ensure emergency vehicle access and civilian egress. According to expert analysis submitted by the appellant, the primary access routes on Saltillo Street do not meet this standard. Approving construction on a substandard street in a high-risk zone creates a life-safety "bottleneck" that impacts the intent of the State Minimum Fire Safe Regulations.
- **Ineligibility for Class 3 Categorical Exemption:** The City has applied a **Class 3 exemption (CEQA Guidelines § 15303)**. Under **CEQA Guidelines § 15300.2(a)**, a categorical exemption may not be used for a project located in a sensitive environmental resource of critical concern. As this site is within the **Santa Monica Mountains Zone** and contains a sensitive Coast Live Oak Woodland habitat, it triggers the "unusual circumstances" exception under **CEQA Guidelines § 15300.2(c)**. A standard tree-replacement plan cannot fully mitigate the destruction of a protected woodland

ecosystem.

- **Lack of California Fire Code Compliance:** The Project's current landscape plans do not demonstrate compliance with **Chapter 49 of the California Fire Code (Title 24, Part 9)**. Specifically, the plans lack the necessary technical documentation for crown separation and the 100-foot defensible space requirements mandated. Without these specific clearances, the Project increases the fire load for the entire neighborhood.
- **Unaddressed Cumulative Impacts:** Under **CEQA Guidelines § 15300.2(b)**, exemptions are invalid when the cumulative impact of successive projects of the same type in the same place over time is significant. This Project, when viewed alongside other non-compliant approvals and the massive 300+ unit development proposed for the **Woodland Hills Golf Course**, creates a compounding strain on our inadequate roadway infrastructure in a high fire-risk zone.

I respectfully request that the Committee grant the appeal, revoke the CEQA exception, and require an EIR to protect the safety of the Girard Tract and Woodland Hills residents.

Sincerely,

*Jeffrey Chan*

## Communication from Public

**Name:** Jenna Cavelle and Chris Morrow  
**Date Submitted:** 05/05/2026 01:44 PM  
**Council File No:** 26-0412  
**Comments for Public Posting:** Please see the attached letter.

**Los Angeles City Council  
Planning and Land Use Management Committee**

**May 3, 2026**

**Chris Morrow and Jenna Cavelle**

21301 Castillo Street  
Woodland Hills, CA 91364  
[cmorrow8@gmail.com](mailto:cmorrow8@gmail.com)  
cc: [jennacavelle@mac.com](mailto:jennacavelle@mac.com)

VIA EMAIL AND ELECTRONIC UPLOAD

Los Angeles City Council  
Planning and Land Use Management Committee  
200 North Spring Street  
Los Angeles, CA 90012  
[clerk.cps@lacity.org](mailto:clerk.cps@lacity.org)  
[Clerk.PLUMCommittee@lacity.org](mailto:Clerk.PLUMCommittee@lacity.org)

**Re: CEQA Appeal – 4230 N. Saltillo Street**

Case Nos.: ZA-2023-1206-ZAD-DRB-SPP-MSP-HCA; ENV-2023-1207-CE  
Council File No. 26-0412

Dear Councilmembers and PLUM Committee:

We are residents of Woodland Hills living in close proximity to the proposed development at 4230 N. Saltillo Street (“Project”). We write to formally object to the City’s reliance on a categorical CEQA exemption and to strongly urge that the appeal be granted.

The record demonstrates substantial evidence of significant environmental impacts, which legally precludes the use of a categorical exemption under CEQA. Proceeding without full environmental review would constitute a failure to comply with CEQA’s core mandate to disclose and mitigate environmental harm.

**1. Public Safety and Fire Risk – Inadequate Access and Egress**

The Project is located within a designated Very High Fire Hazard Severity Zone. Existing access routes, including Saltillo Street, are substandard—narrow, constrained, and lacking sufficient clearance for emergency vehicles. The addition of new residential density on an already inadequate roadway network creates a foreseeable and unacceptable risk to life safety.

In the event of wildfire, restricted access will impede evacuation and delay emergency response. This is precisely the type of “significant impact” CEQA is intended to evaluate. The City cannot lawfully ignore these conditions or defer analysis through an exemption.

**2. Unusual Circumstances Exception – Environmental Sensitivity**

The Project site contains sensitive natural features, including mature oak trees and functioning habitat space. The proposal’s intensity—effectively maximizing buildable area with minimal open space—would result in the permanent degradation of these resources.

Under CEQA Guidelines §15300.2(c), the “unusual circumstances” exception applies where a project presents a reasonable possibility of significant environmental effects. The combination of hillside terrain, fire risk, and sensitive ecological resources clearly meets this threshold. The City’s attempt to apply a categorical exemption is therefore improper.

### **3. Overdevelopment and Loss of Open Space**

The proposed design reflects a wall-to-wall development approach that is incompatible with the environmental and topographical constraints of the site. Adequate open space is not a discretionary luxury in hillside communities—it is a functional necessity for fire defensibility, slope stability, and ecological continuity.

The elimination of meaningful open space increases both environmental and safety risks and represents a fundamental land use incompatibility.

### **4. Construction Impacts – Dust, Debris, Noise, and Ongoing Disturbance**

The Project will generate significant construction-related impacts, including excessive dust, debris, and prolonged noise exposure. We are already subjected to persistent construction noise in this area, and this proposed development is located in our immediate vicinity—less than 500 feet from our residence.

Given the constrained access, steep terrain, and proximity to existing homes, there is substantial evidence that noise and construction disturbance will be significant, continuous, and inadequately mitigated. CEQA requires analysis of these impacts, particularly where they materially affect the use and enjoyment of nearby residences. The City has failed to meaningfully evaluate how these impacts will be managed under real-world conditions.

### **5. Cumulative Impacts**

This Project cannot be evaluated in isolation. The surrounding area is already experiencing increased development pressure, further straining inadequate infrastructure and compounding fire risk. CEQA requires analysis of cumulative impacts, which has not been performed.

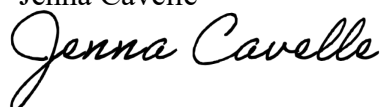
In sum, there is substantial evidence in the record supporting a fair argument that the Project may result in significant environmental impacts. Under well-established CEQA law, this alone is sufficient to require preparation of an Environmental Impact Report (EIR).

The City’s reliance on a categorical exemption is legally indefensible under these circumstances. We respectfully request that the City grant the appeal, set aside the CEQA exemption, and require full environmental review consistent with CEQA.

Sincerely,



Chris Morrow  
Jenna Cavelle



## Communication from Public

**Name:** James W. Bowman  
**Date Submitted:** 05/05/2026 01:46 PM  
**Council File No:** 26-0412  
**Comments for Public Posting:** Please see the attached letter.

James W. Bowman  
21380 Castillo Street  
Woodland Hills, CA 91364  
jimbowman@aol.com

May 4, 2026

Los Angeles City Council  
Planning and Land Use Management Committee  
200 North Spring Street  
Los Angeles, CA 90012  
clerk.cps@lacity.org  
Clerk.PLUMCommittee@lacity.org

**Re: Support for CEQA Appeal; 4230 N. Saltillo Street;  
Case Nos.: ZA-2023-1206-ZAD-DRB-SPP-MSP-HCA; ENV-2023-1207-CE;  
Council File No. 26-0412 (“Project”)**

Dear City Council and PLUM Committee Members:

My name is James W. Bowman. I am a 28 year resident of Woodland Hills. As a concerned member of the local community, I am writing to strongly urge you to grant the California Environmental Quality Act (“CEQA”) appeal filed by Girard Tract Community Preservation (“Appellant”) regarding the proposed development at 4230 N. Saltillo Street (“Project”).

Our neighborhood is located within a designated high fire severity zone, an area already vulnerable to wildfire risk. The existing infrastructure—particularly our narrow, winding streets—is insufficient to safely accommodate current traffic levels, let alone the increased congestion that additional development would bring. In the event of a wildfire emergency, such as those recently experienced in nearby areas, these limitations could significantly hinder evacuation efforts and impede access for emergency responders. The safety implications alone warrant serious reconsideration of this project.

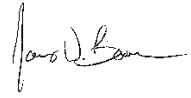
Additionally, the proposed construction would necessitate the removal of numerous mature oak trees. These trees are not only environmentally valuable but are also protected under the Mulholland Scenic Parkway guidelines. Their removal would undermine established conservation protections and diminish the natural character and ecological integrity of the area.

The surrounding habitat supports a diverse range of wildlife, including mountain lions, coyotes, raccoons, rabbits, and other species. Increased development and habitat disruption would inevitably impact these populations, further contributing to the loss of biodiversity in an already sensitive ecosystem.

For these reasons—public safety concerns, environmental protections, and preservation of wildlife habitat—I respectfully urge the City to deny approval of this proposed development. Thoughtful stewardship of our community requires prioritizing safety, sustainability, and adherence to established environmental guidelines.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "James W. Bowman". The signature is written in a cursive style with a vertical line on the left side.

James W. Bowman

## Communication from Public

**Name:** Joy Tangarone  
**Date Submitted:** 05/05/2026 01:47 PM  
**Council File No:** 26-0412  
**Comments for Public Posting:** Please see the attached letter.

Joy Tangarone  
4201 Esteban Road  
Woodland Hills, Ca. 91364

May 2, 2026

Los Angeles City Council  
Planning and Land Use Management Committee  
200 North Spring Street  
Los Angeles, CA 90012  
clerk.cps@lacity.org  
Clerk.PLUMCommittee@lacity.org

Re: Support for CEQA Appeal; 4230 N Satillo Street

Case Nos: ZA-2023-1206-ZAD-DRB-SPP-MSP-HCA; ENV-2023-1207-CE; Council File No. 26-0412 ("Project")

Dear City Council and PLUM Committee Members:

My name is Joy Tangarone and I am a resident of the Woodland Hills neighborhood where this project is listed. I am writing to ask you to grant the CEQA appeal filed by the Girard Tract Community Preservation ("appellant") regarding the proposed development at 4230 N. Satillo Street. The project is a public safety threat to our neighborhood as well as the wildlife and environmental resources in the area.

We all know the devastation of wildfires and that this area is listed as a "high fire hazard severity zone". The importance of proper evacuation routes as well as fire safety regulations are followed by residents who live here as we work together to keep our community safe. This project fails to meet State Minimum Fire Safe Regulations as the primary access routes on Satillo do NOT meet the required 20 foot minimum. There is also NO parking anytime on this single lane road which does NOT even have street lights. There is no way a construction team can build this proposed project without endangering residents as there is NO parking anytime on N. Satillo St. The surrounding streets like Golondrina, Alhama and many others in this commonly referred to "spaghetti hill" area also have no parking as well as restricted parking. The homes on Satillo all sit on top of the land and this is a project that is wanting to dig up the hill below large homes on Alhama and remove a very large amount of the land for a home that is not sized to fit this area. If a developer can't park on the lot and keep the roads clear it is a safety concern anywhere let alone in our neighborhood with substandard streets. There are also no curbs and gutters in this old infrastructure so all the mud, concrete mixing, clean up and debris washes down the street into our neighborhood.

The other issue I have with any CEQA exemption is that the property is located within the Santa Monica Mountain Zone, Mulholland Scenic Corridor and Girard Tract where the regulation specifics are there for a reason, so just like any other resident who lives here and wants to remodel, these need to be followed. The Coast Live Oaks are protected trees and this lot has beautiful mature oaks holding the hillside and providing a canopy for the oak titmouse birds and other wildlife. The tree roots are connected and it is detrimental to the environment to remove the number needed to build a proposed oversized plan for a three story house with pool and parking for four cars. This same developer was warned of the damage to the Oak trees on a build taking place on Tosca Rd. They cut trenches too close to roots and during the winds and rains this past winter one of the mature large oaks fell over and damaged neighbors lot. It is important to look at this property lot and be sure any plan for it has full EIR reports, CEQA clearance and is sized correctly for our neighborhood. I am requesting that you will grant the appeal, revoke the CEQA clearance and require the preparation of an appropriate environmental review.

Sincerely,

Joy Tangarone



## Communication from Public

**Name:** Justin Stafford  
**Date Submitted:** 05/05/2026 01:48 PM  
**Council File No:** 26-0412  
**Comments for Public Posting:** Please see the attached letter.

May 3rd 2026

LA City Council  
Planning and Land Use Management Committee  
200 N. Spring St  
LA, CA 90012

RE: Support for CEQA Appeal; 4230 Saltillo St.  
Case Nos: ZA -2023-1206-ZAD-DRB-SPP-MSP-HCA: ENV-2023-1207-CE;  
Council File NO.26-0412 ( Project)

Dear City Council and PLUM Committee Members,

My name is Justin Stafford, I own the property 4215 Saltillo St. Ive been in the property about 1 year. I found out about the proposed construction at 4230 Saltillo approx. Dec 2025. I am writing to share/ include my concerns about this project. I share similar sentiments as my neighbors. I believe the location is not appropriate for this development. The entire area and surrounding streets are quite narrow. The proposed construction duration of 16 months will be disruptive to the area. The streets in the area are designated no parking from the city and any parking will render some areas of the street impassable. Construction crews and trucks etc will block streets causing ongoing issues that concern me. The proposed construction states to "widen the street" but even if that happens in that small section- the entire area and streets surrounding still remain narrow. Too narrow for 2 cars to pass at the same time. There are many neighbors that have been in their homes for many years and some are older people. If they need emergency services these obstructions could hinder any emergency response. If there is a large scale emergency and evacuation ,such as a fire , the area could be blocked delaying or trapping people or slowing/ preventing first responders. If a tragedy occurs the city will be liable as we have all communicated our concerns in writing.

The environmental impact will also be negatively affected by this development. There are numerous Oak trees that fill this hillside and will all potentially be destroyed by this. Their extensive root systems are probably interconnected and keep the hillside stable. I dont think this is an appropriate location for this project. I am asking that this not be approved for development.

Thank you,

Justin Stafford  
4215 Saltillo St  
Woodland Hills CA 91364

## Communication from Public

**Name:** Kris Kettenburg  
**Date Submitted:** 05/05/2026 01:49 PM  
**Council File No:** 26-0412  
**Comments for Public Posting:** Please see the attached letter.

Kris Kettenburg  
21205 Golondrina St.  
Woodland Hills, CA 91364

May 5, 2026

Los Angeles City Council  
Planning and Land Use Management Committee 200 North  
Spring Street  
Los Angeles, CA 90012  
clerk.cps@lacity.org Clerk.PLUMCommittee@lacity.org

**Re: Support for CEQA Appeal; 4230 N. Saltillo Street;  
Case Nos.: ZA-2023-1206-ZAD-DRB-SPP-MSP-HCA;  
ENV-2023-1207-CE; Council File No. 26-0412 (“Project”)**

Dear City Council and Plum Committee Members,

My name is Kris Kettenburg. I'm a resident of 21205 Golondrina st. Woodland hills. My property touches the corner of the proposed development on 4230 N Saltillo Street.

This proposal to build on a known, unbuildable lot, would be completely disruptive to the integrity of this Girard Neighborhood tract. Allowing this project to proceed without an Environmental impact report and giving a CEQA exemption seems to be in complete disregard to the laws that are supposed to protect this community.

Please revoke the CEQA clearance and require the preparation of an appropriate Environmental review document.

Thank You  
Kris Kettenburg

## Communication from Public

**Name:** Liz and Dylan Wexler  
**Date Submitted:** 05/05/2026 01:50 PM  
**Council File No:** 26-0412  
**Comments for Public Posting:** Please see the attached letter.

Liz and Dylan Wexler  
21319 Las Pitas Road  
Woodland Hills, CA 91364

May 5, 2026

Los Angeles City Council  
Planning and Land Use Management Committee 200 North Spring Street  
Los Angeles, CA 90012  
[clerk.cps@lacity.org](mailto:clerk.cps@lacity.org) [clerk.PLUMCommittee@lacity.org](mailto:clerk.PLUMCommittee@lacity.org)

**Re: Support for CEQA Appeal; 4230 N. Saltillo Street;  
Case Nos.: ZA-2023-1206-ZAD-DRB-SPP-MSP-HCA; ENV-2023-1207-CE; Council  
File No. 26-0412 (“Project”)**

Hello Los Angeles City Council and PLUMC,

We are the original owners of our house, built in 1985, and have remained its sole occupants in the years since. Our neighborhood has always remained respectful of nature, adherent to safety codes, and mindful of existing neighbors including young and old families. The proposed project is in violation of everything our community stands for, and we stand in vehement opposition of the proposed development at 4230 Saltillo St in Woodland Hills.

My property is very close to this lot, and as a homeowner in this community for 40 years and we are concerned that any construction, tree removal, or grading on this site will impact this very dense corridor, whether through trimming, root disturbance, or changes to the surrounding soil. This is a huge fire safety issue as well. This location is already a problem spot as the road narrows to 13ft (Minimum fire access is 20ft) and no parking is permitted. Additional occupants and visitors to a house of this proportion will make our neighborhood even more unsafe.

These trees have been part of this area for many years, and any disruption could affect their health and stability. We are also concerned about how changes to the hillside and tree coverage may impact the overall environment and conditions in this immediate area.

Given how close this development would be to our home and property, We respectfully ask that these impacts be carefully considered.

Thank you for your attention.

Sincerely,  
Liz and Dylan Wexler

## Communication from Public

**Name:** Maricel Zabel  
**Date Submitted:** 05/05/2026 01:52 PM  
**Council File No:** 26-0412  
**Comments for Public Posting:** Please see the attached letter.

Maricel Zabel  
4153 Alhama Drive  
Woodland Hills, CA 91364  
[maricelz@pacbell.net](mailto:maricelz@pacbell.net)

May 4, 2026

VIA EMAIL AND ELECTRONIC UPLOAD

Los Angeles City Council  
Planning and Land Use Management Committee  
200 North Spring Street  
Los Angeles, CA 90012  
[clerk.cps@lacity.org](mailto:clerk.cps@lacity.org)  
[Clerk.PLUMCommittee@lacityorg](mailto:Clerk.PLUMCommittee@lacityorg)

**RE: Support for CEQA Appeal: 4230 N. Saltillo Street;  
Case Nos.: ZA-2023-1206-ZAD-DRB-SPP-MSP-HCA; ENV-2023-1207-CE;  
Council File No. 26-0412 ("Project")**

Dear City Council and PLUM Committee Members:

My name is Maricel Zabel. I am a resident of 4153 Alhama Drive, Woodland Hills, CA 91364. As concerned member of the local community for twenty five years, I am writing to strongly urge you to grant the California Environmental Quality Act appeal filed by the Girard Tract Community Preservation.

Major issues that require your thoughtful and full review:

1. Having lived through the Palisades Altadena and Malibu fires, the extremely narrow streets of area, this house will overwhelm us both during an extensive construction and after. The architect of this project estimated that just the construction would take eighteen months to two years. Will the fire department be able to get through when needed? The house itself will take up most of the extra small lot and it will tower over all the surrounding existing properties.
2. The trees of our Girard Tract that we have worked so long to protect, will need to be sacrificed to build this extremely large house vs the small property size. The architect claims this will not hurt the remaining trees, but who can guarantee it won't destroy the whole ecosystem. Half the hill will have to be dug out to build this house!
3. My home is directly above this project. I believe no one can guarantee there is no risk when excavating that much earth below will not destabilize the hill and homes above. In addition, my property has a permanent easement...will there be a guarantee that they will be able to honor it?
4. The scope of the project and the size of the property only show that the developer just wishes to maximize the square footage to achieve the maximum return on his investment. It shows no concern for the "look and feel" of our long standing community, which they will not be living in upon completion.

I leave with you my concerns that I believe are shared by those of who live and enjoy our community.

Sincerely,  
Maricel Zabel

## Communication from Public

**Name:** Matt Sandberg  
**Date Submitted:** 05/05/2026 01:53 PM  
**Council File No:** 26-0412  
**Comments for Public Posting:** Please see the attached letter.

Matt Sandberg  
4207 Esteban Road  
Woodland Hills, Ca 91364

May 1, 2026

**VIA EMAIL AND ELECTRONIC UPLOAD**

Los Angeles City Council  
Planning and Land Use Management Committee  
200 North Spring Street  
Los Angeles, CA 90012  
clerk.cps@lacity.org  
Clerk.PLUMCommittee@lacity.org

**Re: Support for CEQA Appeal; 4230 N. Saltillo Street;  
Case Nos.: ZA-2023-1206-ZAD-DRB-SPP-MSP-HCA; ENV-2023-1207-CE;  
Council File No. 26-0412 ("Project")**

Dear City Council and PLUM Committee Members:

My name is Matt Sandberg. I am a resident of Woodland Hills, CA. As a concerned member of the local community, I am writing to strongly urge you to grant the California Environmental Quality Act ("CEQA") appeal filed by Girard Tract Community Preservation ("Appellant") regarding the proposed development at 4230 N. Saltillo Street ("Project"). The City cannot legally or ethically rely on a "categorical exemption" for this Project when it clearly threatens our public safety and sensitive environmental resources.

The major issues that necessitate a full environmental review include:

- **Violations of State Fire Safety Laws:** The Project is located in a Very High Fire Hazard Severity Zone ("VHFHSZ"). Expert analysis as submitted by Appellant confirms the Project fails to meet the State Minimum Fire Safe Regulations, as the primary access routes on Saltillo Street do not meet the required 20-foot minimum width and exceed allowable grades. Approving new construction on such substandard roads traps residents and blocks emergency responders during a wildfire—a risk we cannot afford.
- **Illegal Use of CEQA Exemptions:** This Project is ineligible for a "Class 3" exemption. It is located within the Santa Monica Mountain Zone, a statutorily designated environmental resource of critical concern. Furthermore, "unusual circumstances" exist because the site contains a sensitive Coast Live Oak Woodland habitat that will be permanently disrupted. The City's standard tree replacement does not mitigate the permanent loss of this biodiversity.
- **Inadequate Fire Code Compliance:** The Project's landscape plans fail to document required crown separation and defensible space clearances mandated by Chapter 49 of the California Fire Code.

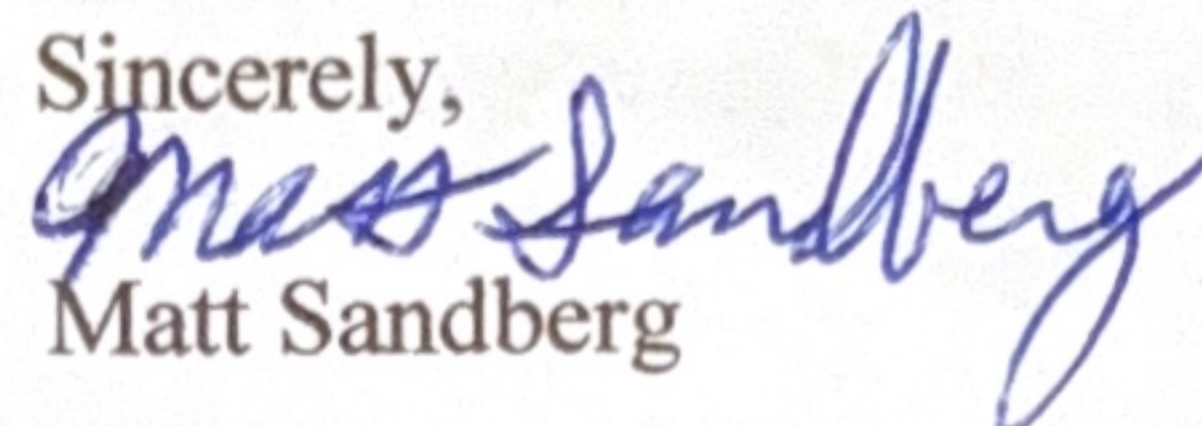
MAY 1, 2026

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- **Dangerous Cumulative Impacts:** This is not an isolated project. When combined with other recently approved non-compliant developments and massive proposed projects nearby (such as the 300+ units at the Woodland Hills Golf Course), the strain on our undersized, non-compliant roadway network becomes a disaster waiting to happen.

Allowing this Project to proceed without an Environmental Impact Report (EIR) ignores the expert evidence in the record and sets a dangerous precedent for hillside safety. I respectfully request that you grant the appeal, revoke the CEQA clearance, and require the preparation of an appropriate environmental review document.

Sincerely,



Matt Sandberg

## Communication from Public

**Name:** Maksym Pukhalevych  
**Date Submitted:** 05/05/2026 01:55 PM  
**Council File No:** 26-0412  
**Comments for Public Posting:** Please see the attached letter.

Maksym Pukhalevych  
4238 Saltillo St  
Woodland Hills, CA, 91364  
mpuhalevich@gmail.com

April 30, 2026

**VIA EMAIL AND ELECTRONIC UPLOAD**

Los Angeles City Council  
Planning and Land Use Management Committee  
200 North Spring Street  
Los Angeles, CA 90012  
clerk.cps@lacity.org  
Clerk.PLUMCommittee@lacity.org

**Re: Support for CEQA Appeal; 4230 N. Saltillo Street;  
Case Nos.: ZA-2023-1206-ZAD-DRB-SPP-MSP-HCA; ENV-2023-1207-CE;  
Council File No. 26-0412 ("Project")**

Dear City Council and PLUM Committee Members:

My name is Maksym Pukhalevych. I am a resident of Woodland Hills. As a concerned member of the local community, I am writing to strongly urge you to grant the California Environmental Quality Act ("CEQA") appeal filed by Girard Tract Community Preservation ("Appellant") regarding the proposed development at 4230 N. Saltillo Street ("Project"). The City cannot legally or ethically rely on a "categorical exemption" for this Project when it clearly threatens our public safety and sensitive environmental resources.

The major issues that necessitate a full environmental review include:

- **Violations of State Fire Safety Laws:** The Project is located in a Very High Fire Hazard Severity Zone ("VHFHSZ"). Expert analysis as submitted by Appellant confirms the Project fails to meet the State Minimum Fire Safe Regulations, as the primary access routes on Saltillo Street do not meet the required 20-foot minimum width and exceed allowable grades. Approving new construction on such substandard roads traps residents and blocks emergency responders during a wildfire—a risk we cannot afford.
- **Illegal Use of CEQA Exemptions:** This Project is ineligible for a "Class 3" exemption. It is located within the Santa Monica Mountain Zone, a statutorily designated environmental resource of critical concern. Furthermore, "unusual circumstances" exist because the site contains a sensitive Coast Live Oak Woodland habitat that will be permanently disrupted. The City's standard tree replacement does not mitigate the permanent loss of this biodiversity.

- **Inadequate Fire Code Compliance:** The Project's landscape plans fail to document required crown separation and defensible space clearances mandated by Chapter 49 of the California Fire Code.
- **Dangerous Cumulative Impacts:** This is not an isolated project. When combined with other recently approved non-compliant developments and massive proposed projects nearby (such as the 300+ units at the Woodland Hills Golf Course), the strain on our undersized, non-compliant roadway network becomes a disaster waiting to happen.

Allowing this Project to proceed without an Environmental Impact Report (EIR) ignores the expert evidence in the record and sets a dangerous precedent for hillside safety. I respectfully request that you grant the appeal, revoke the CEQA clearance, and require the preparation of an appropriate environmental review document.

Sincerely,  
Maksym Pukhalevych

A handwritten signature in black ink, appearing to read 'Maksym Pukhalevych', with a large, sweeping flourish extending to the right.

## Communication from Public

**Name:** Maksym Pukhalevych  
**Date Submitted:** 05/05/2026 01:56 PM  
**Council File No:** 26-0412  
**Comments for Public Posting:** Please see the attached letter.

Maksym Pukhalevych  
4238 Saltillo St  
Woodland Hills, CA, 91364  
mpuhalevich@gmail.com

April 30, 2026

**VIA EMAIL AND ELECTRONIC UPLOAD**

Los Angeles City Council  
Planning and Land Use Management Committee  
200 North Spring Street  
Los Angeles, CA 90012  
clerk.cps@lacity.org  
Clerk.PLUMCommittee@lacity.org

**Re: Support for CEQA Appeal; 4230 N. Saltillo Street;  
Case Nos.: ZA-2023-1206-ZAD-DRB-SPP-MSP-HCA; ENV-2023-1207-CE;  
Council File No. 26-0412 ("Project")**

Dear City Council and PLUM Committee Members:

My name is Maksym Pukhalevych. I am a resident of Woodland Hills. As a concerned member of the local community, I am writing to strongly urge you to grant the California Environmental Quality Act ("CEQA") appeal filed by Girard Tract Community Preservation ("Appellant") regarding the proposed development at 4230 N. Saltillo Street ("Project"). The City cannot legally or ethically rely on a "categorical exemption" for this Project when it clearly threatens our public safety and sensitive environmental resources.

The major issues that necessitate a full environmental review include:

- **Violations of State Fire Safety Laws:** The Project is located in a Very High Fire Hazard Severity Zone ("VHFHSZ"). Expert analysis as submitted by Appellant confirms the Project fails to meet the State Minimum Fire Safe Regulations, as the primary access routes on Saltillo Street do not meet the required 20-foot minimum width and exceed allowable grades. Approving new construction on such substandard roads traps residents and blocks emergency responders during a wildfire—a risk we cannot afford.
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- **Inadequate Fire Code Compliance:** The Project's landscape plans fail to document required crown separation and defensible space clearances mandated by Chapter 49 of the California Fire Code.
- **Dangerous Cumulative Impacts:** This is not an isolated project. When combined with other recently approved non-compliant developments and massive proposed projects nearby (such as the 300+ units at the Woodland Hills Golf Course), the strain on our undersized, non-compliant roadway network becomes a disaster waiting to happen.

Allowing this Project to proceed without an Environmental Impact Report (EIR) ignores the expert evidence in the record and sets a dangerous precedent for hillside safety. I respectfully request that you grant the appeal, revoke the CEQA clearance, and require the preparation of an appropriate environmental review document.

Sincerely,  
Maksym Pukhalevych

A handwritten signature in black ink, appearing to read 'Maksym Pukhalevych', with a large, sweeping flourish extending to the right.

## Communication from Public

**Name:** Michele Ringler and Tristan Thomas  
**Date Submitted:** 05/05/2026 01:58 PM  
**Council File No:** 26-0412  
**Comments for Public Posting:** Please see the attached letter.

## **Michele Ringler and Tristan Thomas**

4201 Alhama Drive  
Woodland Hills, CA 91364  
micheleringler@mac.com

May 3, 2026

Los Angeles City Council

Planning and Land Use Management Committee

200 North Spring Street

Los Angeles, CA 90012

[clerk.cps@lacity.org](mailto:clerk.cps@lacity.org)

[Clerk.PLUMCCCommittee@lacity.org](mailto:Clerk.PLUMCCCommittee@lacity.org)

Dear City Council and PLUM Committee Members,

My name is Michele Ringler and my partner, Tristan Thomas, and I live in the Girard Tract neighborhood in Council District 3. I'm writing to urge you to grant the California Environmental Quality Act (CEQA) appeal filed by the Girard Tract Community Preservation regarding the proposed construction at 4230 Saltillo in Woodland Hills, by investment realtor, Mehran Tebyani. The city cannot rely on "categorical exemptions" for this project when it endangers our environment and the neighborhood's public safety. The proposed construction on a substandard slope of land would entail cutting down two oak trees and an iconic eucalyptus tree (one of the largest in the neighborhood), thus destroying the aesthetic of the canopy (which is visible from Mulholland), and habitat to thousands of birds and wildlife, while also, uprooting a complex root system. The lot is 4670.5 square feet and the proposed dwelling is 2472 square feet, including a pool, which is excessive on a sloped lot. The property abuts a steep hillside, and there is a concern that by removing the two protected oaks and 726 cubic yards of soil, that the hillside could become destabilized. The three story home will take up the majority of the land. There is little space remaining to meet the oak replanting requirement, with 7 oak trees already on the property. In addition, the eucalyptus tree slated for removal is on city land, and is being removed to "widen" the road. This project fails to meet the required 20-foot minimum road width on a substandard road and is a highly significant fire safety hazard. Approving new construction could potentially trap residents in the event of a wildfire.

We urge this committee to not allow this project to proceed without an Environmental Impact Report. We request that you grant the appeal, revoke the CEQA clearance and require an environmental review prior to any construction. It's the least that should be done to ensure the public safety and the safety of the Girard tract residents, as well as to ensure the integrity and stability of the environmental ecosystem in the Girard Tract.

Thank you for your time and attention to this very important matter.

Sincerely yours,

Michele Ringler and Tristan Thomas

- See photos below.







## Communication from Public

**Name:** Michele Ringler and Tristan Thomas  
**Date Submitted:** 05/05/2026 01:59 PM  
**Council File No:** 26-0412  
**Comments for Public Posting:** Please see the attached letter.

## **Michele Ringler and Tristan Thomas**

4201 Alhama Drive  
Woodland Hills, CA 91364  
micheleringler@mac.com

May 3, 2026

Los Angeles City Council

Planning and Land Use Management Committee

200 North Spring Street

Los Angeles, CA 90012

[clerk.cps@lacity.org](mailto:clerk.cps@lacity.org)

[Clerk.PLUMCCCommittee@lacity.org](mailto:Clerk.PLUMCCCommittee@lacity.org)

Dear City Council and PLUM Committee Members,

My name is Michele Ringler and my partner, Tristan Thomas, and I live in the Girard Tract neighborhood in Council District 3. I'm writing to urge you to grant the California Environmental Quality Act (CEQA) appeal filed by the Girard Tract Community Preservation regarding the proposed construction at 4230 Saltillo in Woodland Hills, by investment realtor, Mehran Tebyani. The city cannot rely on "categorical exemptions" for this project when it endangers our environment and the neighborhood's public safety. The proposed construction on a substandard slope of land would entail cutting down two oak trees and an iconic eucalyptus tree (one of the largest in the neighborhood), thus destroying the aesthetic of the canopy (which is visible from Mulholland), and habitat to thousands of birds and wildlife, while also, uprooting a complex root system. The lot is 4670.5 square feet and the proposed dwelling is 2472 square feet, including a pool, which is excessive on a sloped lot. The property abuts a steep hillside, and there is a concern that by removing the two protected oaks and 726 cubic yards of soil, that the hillside could become destabilized. The three story home will take up the majority of the land. There is little space remaining to meet the oak replanting requirement, with 7 oak trees already on the property. In addition, the eucalyptus tree slated for removal is on city land, and is being removed to "widen" the road. This project fails to meet the required 20-foot minimum road width on a substandard road and is a highly significant fire safety hazard. Approving new construction could potentially trap residents in the event of a wildfire.

We urge this committee to not allow this project to proceed without an Environmental Impact Report. We request that you grant the appeal, revoke the CEQA clearance and require an environmental review prior to any construction. It's the least that should be done to ensure the public safety and the safety of the Girard tract residents, as well as to ensure the integrity and stability of the environmental ecosystem in the Girard Tract.

Thank you for your time and attention to this very important matter.

Sincerely yours,

Michele Ringler and Tristan Thomas

- See photos below.







## Communication from Public

**Name:** Appellant Representative - Channel Law Group, LLP  
**Date Submitted:** 05/05/2026 10:51 PM  
**Council File No:** 26-0412  
**Comments for Public Posting:** Supplemental Justification for CEQA Appeal; 4230 N. Saltillo Street; Case Nos. ZA-2023-1206-ZAD-DRB-SPP-MSP-HCA; ENV-2023-1207-CE-1A; Council File 26-0412 (“Project”) // This letter with exhibits has been submitted for record inclusion to the following: Clerk-PLUM-Committee ; City Clerk Council and Public Services ; Councilmember Blumenfield; Renata Ooms, City Planner ; Tiffany Corrales, Planning Assistant ; Matthew Meehan, Deputy City Attorney

# Channel Law Group, LLP

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8383 Wilshire Blvd.  
Suite 750  
Beverly Hills, CA 90211

Phone: (310) 347-0050  
Fax: (323) 723-3960  
www.channellawgroup.com

JULIAN K. QUATTLEBAUM, III  
JAMIE T. HALL \*  
CHARLES J. McLURKIN  
GREGORY T. WITTMANN

Writer's Direct Line: (424) 284-9669  
jamie.hall@channellawgroup.com

\*ALSO Admitted in Texas

May 5, 2026

## VIA ELECTRONIC MAIL

Honorable Members of the Planning and Land Use Management Committee  
Los Angeles City Council  
200 N. Spring Street, Room 395  
Los Angeles, CA 90012  
clerk.plumcommittee@lacity.org  
clerk.cps@lacity.org

**Re: Supplemental Justification for CEQA Appeal; 4230 N. Saltillo Street;  
Case Nos. ZA-2023-1206-ZAD-DRB-SPP-MSP-HCA;  
ENV-2023-1207-CE-1A; Council File 26-0412 ("Project")**

Dear Honorable Members of the PLUM Committee:

This firm represents Girard Tract Community Preservation ("Appellant") in the above-referenced appeal of the South Valley Area Planning Commission's ("South Valley APC") March 4, 2026, determination sustaining the Zoning Administrator's adoption of a Class 3 Categorical Exemption (CEQA Guidelines § 15303) for the proposed two-story single-family residence at 4230 N. Saltillo Street. Appellant filed its initial appeal justification letter on March 9, 2026, which incorporated by reference the prior justification letters dated January 3, 2025, and December 1, 2025, and supersedes none of them. Each of those submittals, the appended Letter of Determination, and the expert reports filed therewith, are incorporated herein by this reference.<sup>1</sup>

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<sup>1</sup> In addition to providing the precise bases for the City's failure to proceed in the manner required by the California Environmental Quality Act ("CEQA"), this letter is also intended to provide pre-suit notification to the City to the extent such notification may be required. The City may remedy the errors identified herein by not deeming the project exempt from CEQA and instead preparing an environmental report for the Project. Appellant will provide the City with a reasonable opportunity to correct these errors by not commencing litigation for at least 14 days after the City's final approval of the Project (should that occur).

Appellant submits this supplemental letter to the PLUM Committee to (i) summarize and rely upon the supplemental biological resources expert review prepared by independent biologist Scott Cashen, M.S., which establishes a fair argument that the Project will result in significant impacts to special-status species, sensitive natural communities, and wildlife movement; (ii) develop further the cumulative-impact exception under CEQA Guidelines § 15300.2(b), supported by a quantitative analysis of the City’s own hillside building permit data; (iii) present new evidence of cumulative impacts to the threatened Southern California / Central Coast Mountain Lion Distinct Population Segment (“DPS”), including documented mountain lion presence in the Project vicinity and within a Santa Monica Mountains Conservancy Linkage Map; and (iv) preempt the City’s anticipated argument that the Project’s undisputed non-compliance with the State Minimum Fire Safe Regulations (14 C.C.R. §§ 1270.00 et seq.) can be “cured” at the building-permit phase by the Los Angeles Department of Building and Safety (“LADBS”) or the Los Angeles Fire Department (“LAFD”). It cannot.

**Administrative Record.** Each evidentiary source cited in this letter is provided in the form of (i) an inline hyperlink to the publicly accessible source and (ii) a corresponding footnote, so that all referenced materials are submitted to the City and become part of the administrative record on this matter. (*Citizens for Open Government v. City of Lodi* (2012) 205 Cal.App.4th 296, 306 [administrative record consists of materials submitted to the agency before the close of the administrative proceedings].)

**I. The Independent Biological Resources Review Prepared by Scott Cashen, M.S., Establishes That the Project Will Have Significant Effects on Biological Resources.**

**A. The City’s Categorical Exemption Rests Entirely on a Developer-Funded Biological Resources Report Prepared by South Environmental in March 2023.**

In adopting the Class 3 Categorical Exemption, the City of Los Angeles relied almost exclusively on the *Biological Resources Report – 4230 Saltillo Street Project*, prepared in March 2023 by AJ Samra (Associate Biologist) and Matthew South (Principal Biologist) of South Environmental, a consultant retained by the developer.<sup>2</sup> The City’s *Justification for Project Exemption* expressly conditions its “no significant impact” finding on that report, stating that “the project will avoid any potential impacts with the implementation of Regulatory Compliance Measures #1 and #2” that were proposed by South Environmental.<sup>3</sup> The South Environmental Report concludes — in conclusory fashion — that the Project will have *no* impact on special-status plants, *no* impact on special-status wildlife (including the mountain lion), *no* impact on

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<sup>2</sup> AJ Samra & Matthew South, South Environmental, Biological Resources Report – 4230 Saltillo Street Project (March 2023).

<sup>3</sup> City of Los Angeles, Department of City Planning, Justification for Project Exemption, Case No. ENV-2023-1207-CE, 4230 N. Saltillo Street, at 5 (“According to the Biological Resources Report prepared by AJ Samra and Matthew South, from South Environmental, in March 2023, the project will avoid any potential impacts with the implementation of Regulatory Compliance Measures #1 and #2 . . .”).

wildlife movement, and *no* cumulative impacts “beyond the impacts described in this report” because, the report asserts, “there is no other project known to be currently proposed within 500-feet of the project site.”

**B. The Independent Expert Review Prepared by Mr. Scott Cashen, M.S., Demonstrates That the South Environmental Report’s Conclusions Are Not Supported by Substantial Evidence.**

At Appellant’s request, independent biologist Scott Cashen, M.S., reviewed the South Environmental Report and the Project’s administrative record. Mr. Cashen has more than twenty-five years of experience evaluating biological resource impacts under CEQA throughout California, including extensive work on hillside oak woodlands, special-status wildlife, and wildlife habitat connectivity in the Santa Monica Mountains and adjacent Simi Hills.<sup>4</sup> The Cashen Report identifies multiple categories of methodological and substantive deficiencies that, individually and collectively, defeat the City’s reliance on the South Environmental Report and establish that the Project will have significant biological resource impacts. (See *Berkeley Hillside Preservation v. City of Berkeley* (2015) 60 Cal.4th 1086, 1105 [substantial evidence of a significant effect, standing alone, may establish an unusual circumstance and defeat a categorical exemption].)

1. The Single One-Hour February Survey Is Inadequate to Detect Special-Status Species or Mountain Lion Use.

Mr. Cashen first identifies a fundamental methodological flaw: the entire biological assessment is grounded in a single one-hour reconnaissance survey conducted on February 16, 2023, by a single Associate Biologist. CDFW protocols require multiple, appropriately timed surveys covering each species’ detection window.<sup>5,6</sup> A one-hour February visit cannot reliably detect spring-blooming special-status plants, summer-detectable bats and reptiles, breeding birds,

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<sup>4</sup> Scott Cashen, M.S., Senior Biologist, has more than twenty-five years of experience as an independent biological consultant in California, with specialized expertise in CEQA review of biological resource impacts, special-status wildlife (including mountain lion), oak woodlands, and wildlife habitat connectivity. Mr. Cashen has been retained, deposed, and qualified as a CEQA biological resources expert in numerous proceedings before California courts and lead agencies. A true and correct copy of Mr. Cashen’s full report (“Cashen Report”) and Curriculum Vitae and Statement of Qualifications is attached as **Exhibit 1**.

<sup>5</sup> California Department of Fish and Wildlife, *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities* (rev. Mar. 20, 2018), available at <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=18959>.

<sup>6</sup> For purposes of Pub. Res. Code § 21167.6(e)(7), the court in *Consolidated Irrig. Dist. V Superior Court* (2012) 205 CA4th 697, 723, held that such evidence has been submitted to the agency “when the commenter has made the document readily available for use or study by lead agency personnel.” The court concluded that citing the URL of a specific webpage amounts to submission of the document found on that page to the agency. As such, we expect all URL citations to be produced for consideration by decisionmakers.

or transient large mammals such as the mountain lion. The South Environmental Report's repeated invocation of negative findings ("no special-status wildlife was observed") is therefore not substantial evidence of absence — it is, at best, evidence of inadequate survey effort.

2. The Report's Dismissal of Mountain Lion Habitat Value Is Contradicted by the City's Own ZIMAS Designation, the SMMC Linkage Map, and Documented Mountain Lion Presence Within the Adjacent Habitat Block.

South Environmental concedes that the Project lies within the northern foothills of the Santa Monica Mountains and immediately adjacent to a golf course but concludes, in two sentences, that the parcel "would not be useful habitat" for mountain lion because of "significant human development" nearby. That conclusion is contradicted by the City's own data: ZIMAS classifies the Project parcel as having *Medium* mountain lion potential.<sup>7</sup> The Project also lies within a state-recognized landscape linkage mapped by the Santa Monica Mountains Conservancy ("SMMC") that connects mountain lion habitat in the Santa Monica Mountains with habitat in the adjacent Simi Hills.<sup>8</sup> On February 11-12, 2026, the California Fish and Game Commission unanimously voted to list the Santa Monica Mountains mountain lion population as a *threatened* species under the California Endangered Species Act, finding that "habitat loss, habitat fragmentation by roads, freeways and housing" is the principal extinction threat facing this DPS.<sup>9</sup> Appellant's members have also documented periodic mountain lion presence within the adjacent open space area east of the Project site (the Woodland Hills Country Club golf course and Girard Reservoir watershed), including video and photographic evidence submitted herewith.<sup>10</sup> In light of the City's own "Medium" ZIMAS designation, the mapped linkage, the recent CESA listing, and direct documentation of lion presence, South Environmental's flat

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<sup>7</sup> City of Los Angeles, ZIMAS parcel profile for 4230 N. Saltillo Street (Assessor's ID No. 2172-023-053), "Mountain Lion potential: Medium." The ZIMAS profile is publicly accessible at <https://zimas.lacity.org>. A true and correct copy is attached as **Exhibit 2**.

<sup>8</sup> California Department of Fish and Wildlife & Conservation Biology Institute, California Essential Habitat Connectivity Project: A Strategy for Conserving a Connected California (2010), Wildlife Habitat Connectivity Map, including the Golf Course Linkage between the Santa Monica Mountains and Simi Hills ("SMMC Linkage"). Map attached as **Exhibit 3**. <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=43450&inline>

<sup>9</sup> California Fish & Game Comm'n, Item 17 (Feb. 11-12, 2026) (unanimous vote to list six populations of Central Coast and Southern California mountain lions, including the Santa Monica Mountains population, as "threatened" under the California Endangered Species Act). Staff Summary available at <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=241267&inline>.

<sup>10</sup> Mountain lion and bobcat videos and photographs taken in and around the Project vicinity in the Santa Monica Mountains / Simi Hills area, comprising: **Exhibit 4** (Mountain Lion Daylight Driveway Sighting); **Exhibit 5** (Bobcat at Residential Gate); **Exhibit 6** (Mountain Lion at Active Construction Site, Nest cam); and **Exhibit 7** (Wildlife Visit to Residential Property, Nest cam).

conclusion of “no habitat value” is unsupported by substantial evidence and, at minimum, raises a fair argument of significant impact.

3. The Report Understates the Ecological Value of the On-Site Coast Live Oak Woodland and Wholly Fails to Address Cumulative Loss of Oak Canopy in the 91364 Hillside Area.

South Environmental concedes that nine protected coast live oaks (*Quercus agrifolia*) occur on the parcel, that two will be removed outright, and that others may be “inadvertently impacted” by construction equipment. The report nevertheless rates the woodland “Rank D — Severely Disturbed, Poor” on the basis of fuel-modification disturbance and dismisses any impact as “mitigated” by a 4:1 replanting ratio. Mr. Cashen explains that this analysis is doubly flawed. *First*, coast live oak is a locally protected species under the Los Angeles Protected Tree Ordinance<sup>11</sup>, and the City’s own L.A. CEQA Thresholds Guide identifies a project as having a significant biological impact when it results in “the loss of individuals” of a locally designated species or “a reduction of a locally designated natural habitat.”<sup>12</sup> The mature coast live oaks at this site — some of which exceed 70 years in age — cannot be replaced by 24-inch box saplings within any meaningful planning horizon, and the temporal loss of canopy is itself a CEQA impact. *Second*, the report’s declaration that there are “no other project[s] currently proposed within 500-feet of the project site” is factually incorrect and analytically deficient under any standard. The City has approved or is currently processing at least one additional new single-family residence on the very same street — 4204 N. Saltillo Street, Case No. ZA-2025-1911-CU1-MSP-DRB-SPCC — plus dozens of other hillside residential projects within the same zip code, as detailed in Section II below. The 500-foot radius “cumulative” analysis is the wrong analytical frame; CEQA requires consideration of “successive projects of the same type in the same place, over time,” which here means the entire 91364 hillside community. (CEQA Guidelines § 15300.2(b).)

4. The Report’s Wildlife-Movement Conclusion Conflicts With Both the City’s Mapped Protected Areas for Wildlife (PAWs) and the SMMC Linkage Map

South Environmental confines its wildlife-movement assessment to a 200-foot radius and concludes there is no movement value. Mr. Cashen explains that this entirely misses the relevant scale. The Project sits within the broader Santa Monica Mountains – Simi Hills movement

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<sup>11</sup> Los Angeles Municipal Code § 46.00 *et seq.* (Protected Tree and Shrub Regulations), available at [https://codelibrary.amlegal.com/codes/los\\_angeles/latest/lamc/0-0-0-132254](https://codelibrary.amlegal.com/codes/los_angeles/latest/lamc/0-0-0-132254).

<sup>12</sup> City of Los Angeles, L.A. CEQA Thresholds Guide (2006), § C-1 (Biological Resources) (“A project would normally have a significant impact on biological resources if it would result in the loss of individuals, or the reduction of existing habitat, of a State or federal listed endangered, threatened, rare, protected, or candidate species . . . [or] the loss of individuals, or the reduction of existing habitat, of any locally designated species or a reduction of a locally designated natural habitat or plant community.”), available at <https://planning.lacity.gov/odocument/cc8fb2f5-dc6c-47f1-bfc3-864b84621abb/CEQAThresholdsGuide.pdf>.

context, the City’s mapped Santa Monica Mountains West Protected Areas for Wildlife (“PAW”)<sup>13</sup>, and an SMMC Linkage. The on-site coast live oak canopy, even where partially fuel-modified, contributes meaningful canopy connectivity for raptors, bats, and small mammals moving between the golf-course open space to the east and the larger Santa Monica Mountains habitat block to the south. South Environmental’s contrary, conclusory dismissal does not constitute substantial evidence.

5. Conclusion: The Cashen Report Establishes a Fair Argument of Significant Biological Impact and Defeats the Class 3 Categorical Exemption.

Taken together, the Cashen Report demonstrates that the City’s reliance on the South Environmental Report cannot withstand fair scrutiny. The Project may have significant impacts on protected coast live oak woodland, on the threatened mountain lion DPS and its mapped habitat linkage, on the City’s mapped Protected Areas for Wildlife, and on cumulative wildlife movement in the Santa Monica Mountains – Simi Hills landscape. The PLUM Committee must therefore recommend that the City Council grant the appeal.

**II. The Cumulative-Impact Exception Under CEQA Guidelines § 15300.2(b) Independently Bars Use of a Class 3 Categorical Exemption.**

**A. Legal Standard.**

CEQA Guidelines § 15300.2(b) provides that “[a]ll exemptions for these classes are inapplicable when the cumulative impact of successive projects of the same type in the same place, over time is significant.” Courts apply a bifurcated standard: once an existing cumulative impact is established by substantial evidence, the fair-argument test applies to determine whether the project will contribute to that impact. (*Aptos Residents Ass’n v. County of Santa Cruz* (2018) 20 Cal.App.5th 1039, 1052 (“*Aptos Residents Ass’n*”).) The exception turns not on whether one additional house, in isolation, is significant, but whether “successive projects of the same type, in the same place, over time” collectively cross the significance threshold. (*Bridges v. Mt. San Jacinto Community College Dist.* (2017) 14 Cal.App.5th 104, 115.)

**B. The City’s Own Building-Permit Data Establish a Cumulative Pattern of Successive Hillside Residential Construction in ZIP 91364.**

Pursuant to a California Public Records Act request, the Department of Building and Safety produced PRA File No. PR25-01969, which lists every hillside new-construction building permit issued by the City.<sup>14</sup> Filtering that dataset for **zip code 91364** — the same zip code as the

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<sup>13</sup> Environmental Science Associates for the L.A. Department of City Planning, Protected Areas for Wildlife and Wildlife Movement Pathways Final Report (Feb. 2021), available at [https://planning.lacity.gov/odocument/13de48cd-2fae-4ce7-ab4b-3ae213020b87/2021-02-26\\_ESA\\_PA\\_W-WMP\\_Final\\_Report.pdf](https://planning.lacity.gov/odocument/13de48cd-2fae-4ce7-ab4b-3ae213020b87/2021-02-26_ESA_PA_W-WMP_Final_Report.pdf).

<sup>14</sup> Public Records Act Request Response, City of Los Angeles File No. PR25-01969 (Hillside Building Permits), a spreadsheet listing complete copy of the 71 permits issued in zip

Project — between **July 1, 2021** (the trigger date for the State Minimum Fire Safe Regulations) and the date of production yields **seventy-one (71) new-construction hillside building permits**, representing the following uses:

<b>Use Description</b>	<b>Permits Issued</b>
Single-Family Dwelling	14
Accessory Dwelling Unit	29
Patio Cover	12
Recreation Room	6
Storage Building	3
Accessory Living Quarters	3
Miscellaneous Building/Structure	2
Apartment	1
Duplex	1
<b>TOTAL (Hillside, ZIP 91364, 7/1/2021 to present)</b>	<b>71</b>

Of these 71 permits, 14 are for new **single-family dwellings** — a category that, like this Project, the City has uniformly determined to be Class 3 categorically exempt from CEQA without any project-level cumulative-impact analysis. Twenty-nine (29) additional permits are for **Accessory Dwelling Units**, each of which adds residential density and a corresponding evacuation load to the same hillside roadway network as the Project. The remainder — patio covers, recreation rooms, accessory living quarters, multifamily units — collectively represent ongoing intensification of residential use within the same hillside community. The Project, located on a substandard hillside street within this same VHFHSZ neighborhood, is the precise type of “successive project of the same type, in the same place, over time” that CEQA Guidelines § 15300.2(b) was enacted to capture.

**C. The City Has Issued Class “B” Public-Works Permits — Including for the Project Itself — on Substandard Hillside Streets Throughout the Same Hillside Community Without Any Compliance Review Under the State Minimum Fire Safe Regulations.**

Pursuant to LAMC § 62.111, “Class B” Permits are required for extensive public-works improvements within the public right-of-way — including the widening, regrading, or extension of streets — that ordinarily would be the mechanism by which a developer might bring a substandard roadway into compliance with the State Minimum Fire Safe Regulations’ 20-foot two-lane width and 16-percent maximum-grade standards. The City has produced a complete list of B-Permits issued from its public Bureau of Engineering database.<sup>15</sup> The dataset reveals that

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code 91364 since July 1, 2021, are summarized in the table below and a complete sorted list is attached as **Exhibit 8**.

<sup>15</sup> List of Class “B” Permits Issued by the City of Los Angeles, compiled from the Bureau of Engineering’s public B-Permit database (<https://engpermits.lacity.org/bpermits/>), reflecting 915 B-Permits issued citywide. Of these, 112 are within a State-mapped VHFHSZ and at least 39

the City has issued **915 B-Permits citywide, of which 112 are located within a State-mapped VHFHSZ and 39 are on substandard roadways less than 20 feet wide** — yet the City’s own internal forms reflect that none of these 39 permits has been reviewed for compliance with the State Minimum Fire Safe Regulations. (See 14 C.C.R. § 1270.03(a)(3), (c)(4); LAMC § 57.4908.1 citing to California Fire Code §§ 4908, *et seq.*)

Of particular evidentiary significance, the dataset confirms that the City **issued a B-Permit for the Project itself** — Permit No. BR206331, 4230 N. Saltillo Street, dated January 29, 2025 — with a Hillside Referral Form status flagged as “*Report Incomplete*” on the very question of whether the access roadway provides the required 20-foot two-lane width.<sup>16</sup> In other words, the City has admittedly never completed the threshold analysis required to determine whether this Project complies with the Fire Safe Regulations — yet has nevertheless adopted a Categorical Exemption finding that there will be no significant environmental effect. That sequence — issue the public-works permit first, defer the Fire Safe Regulations review to nowhere, and then declare the project exempt from CEQA — is the textbook impermissible deferral that CEQA forbids. (See *Sundstrom v. County of Mendocino* (1988) 202 Cal.App.3d 296, 307–308.)

Confining the B-Permit dataset to zip code 91364 — the same zip code as the Project — yields **sixteen B-Permits** issued in the immediate hillside community of the Project, the great majority of which are within the VHFHSZ and many of which are on streets confirmed by the City’s own Hillside Referral Form to be substandard at less than 20 feet wide.<sup>17</sup> These include **4621 N. Saltillo Street** (the very same street as the Project), **4252 and 4254 N. Alhama Drive** (immediately east of the Project), **4172 N. Rosario Road**, **4933 N. Cerrillos Drive**, **21055 W. Topochico Drive**, and **4690-4710 N. Burgundy Road** — each within walking distance of the Project, each on a substandard hillside roadway, and each issued without any review of compliance with the State Minimum Fire Safe Regulations. The cumulative impact of this pattern of public-works approvals on the same evacuation roadway network the Project will use

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are on substandard roadways less than 20 feet wide per the City’s own Hillside Referral Form. A complete copy is attached as **Exhibit 9** (“B-Permit Dataset”).

<sup>16</sup> B-Permit Dataset, Permit No. BR206331, 4230 N. Saltillo St., Woodland Hills, CA 91364, issued January 29, 2025 (VHFHSZ: Yes; Hillside Referral Form: “Report Incomplete”). The City issued the public-works permit for this very Project despite an incomplete Hillside Referral Form on the question of compliance with the 20-foot roadway requirement. <https://engpermits.lacity.org/bpermits/>

<sup>17</sup> Filtered list of B-Permits issued in zip code 91364 since 2023. Sixteen B-Permits were issued in 91364, including the Project itself (BR206331, 4230 N. Saltillo St.), as well as BR206174 (4621 Saltillo St.), BR206334 (4252 Alhama Dr.), BR206319 (4254 Alhama Dr.), BR206332 (4172 Rosario Rd.), BR206280 (21055 Topochico Dr.), BR206287 (4933 Cerrillos Dr.), BR206282 (4690-4710 N. Burgundy Rd.), BR206250 (4314 Canoga Dr.), and BR206337 (5300 Oakdale Ave.) — among others. Multiple of these are flagged on substandard <20-foot roadways and all are within the immediate hillside community of the Project. Filtered list attached as **Exhibit 10**.

is profound and is precisely what CEQA Guidelines § 15300.2(b) requires the City to consider before adopting a categorical exemption.

**D. The City Has Approved 196 Applications to Waive the State-Mandated 20-Foot Roadway Width Within the VHFHSZ Since 2020 — Including the Waiver Granted to This Very Project.**

Even more probative of cumulative impact is the City’s pattern of approving Zoning Administrator Determinations (and now, post-Ordinance 187,712, Class 1 Conditional Use Permits) that waive the 20-foot continuous paved roadway requirement of LAMC § 12.21 C.10(i)(3) — the very requirement that mirrors the State Minimum Fire Safe Regulations’ 20-foot two-lane width standard. Records reflect that the City has received **201 such applications since January 1, 2020**, of which **196 are located within a State-mapped VHFHSZ** and **139 are for new construction on previously vacant lots**.<sup>18</sup> The Project is one of these 196 VHFHSZ waiver approvals.<sup>19</sup>

That cumulative pattern is not theoretical. At least four **immediate-vicinity** entries in the ZAD Waiver Dataset are for new-construction single-family residences on substandard hillside streets in the same Girard Tract / Woodland Hills hillside community as the Project: (i) 4621 N. Saltillo Street; (ii) 4337 N. Tosca Road; (iii) 4933 N. Cerrillos Drive; and (iv) 4172 N. Rosario Road.<sup>20</sup> Each was processed under the same Class 3 Categorical Exemption framework as the present Project, and each waived the same state-mandated roadway-width requirement. The aggregate effect of these successive “new-on-vacant-lot” waivers is the precise cumulative impact CEQA Guidelines § 15300.2(b) prohibits the City from sweeping under a Class 3 exemption.

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<sup>18</sup> List of Zoning Administrator Determination (ZAD) and Class 1 Conditional Use Permit applications waiving the 20-foot continuous paved roadway requirement of LAMC § 12.21 C.10(i)(3), filed with the City of Los Angeles since January 1, 2020. The dataset (compiled from publicly available case-tracking records) reflects 201 such applications citywide, of which 196 are located within a State-mapped Very High Fire Hazard Severity Zone, and 139 are for new construction on previously vacant lots. A complete copy is attached as **Exhibit 11** (“ZAD Waiver Dataset”).

<sup>19</sup> ZAD Waiver Dataset, Case No. ENV-2023-1207-CE / ZA-2023-1206-ZAD-DRB-SPP-MSP-HCA / ZA-2023-1206-ZAD-DRB-SPP-MSP-HCA-1A, 4230 N. Saltillo St., filed February 21, 2023, project type “New on Vacant Lot,” status “Approved with Conditions” — i.e., the Project at issue in this appeal.

<sup>20</sup> ZAD Waiver Dataset, immediate-vicinity entries: (i) 4621 N. Saltillo Street (ENV-2019-4080-CE / ZA-2019-4079-ZAD, filed July 11, 2019, Partially Approved); (ii) 4337 N. Tosca Road (ENV-2021-9427-CE / ZA-2021-9426-ZAD, filed November 16, 2021, Approved with Conditions); (iii) 4933 N. Cerrillos Drive (ENV-2024-461-CE / ZA-2024-460-ZAD, filed January 19, 2024, Pending); (iv) 4172 N. Rosario Road (ZA-2025-3382-CU1, filed June 17, 2025, Pending). All four are new-on-vacant-lot single-family residences proposed on substandard hillside streets in the same hillside community as the Project.

**E. The City Has Approved 32 New Parcel Map Applications and 28 Private-Street Applications in the VHFHSZ Since July 1, 2021 — Each Without Any Compliance Review Under the State Minimum Fire Safe Regulations.**

Beyond the building permits, B-Permits, and ZAD/CU1 waivers identified above, the cumulative-impact analysis must also account for two further classes of City actions: (i) **32 Parcel Map applications** filed for new lots within the VHFHSZ since July 1, 2021 — every one of which creates new development potential within the same hillside community<sup>21</sup>; and (ii) **28 Private Street (Deemed Approved Private Street) applications** within the VHFHSZ since July 1, 2021, which legitimize substandard private accesses without ever subjecting them to the State Minimum Fire Safe Regulations.<sup>22</sup> Each of these classes of approvals — like the Project — is treated by the City as ministerial or as a routine Class 3 exemption, with no cumulative-impact analysis. Together with the 14 new SFD permits, 29 new ADU permits, 196 ZAD/CU1 waivers, 39 substandard-road B-Permits, 32 parcel maps, and 28 private streets summarized above, the cumulative footprint of new VHFHSZ development the City has approved or is processing in the post-Senate Bill 901 (2018) era is overwhelming.

**F. Summary of the Cumulative Pattern.**

<b>City Approval / Application Category</b>	<b>Approvals</b>
New-Construction Hillside Building Permits, ZIP 91364, Hillside Areas, Since 7/1/2021	71
Class “B” Permits Issued Citywide on Substandard <20-Foot Roadways in the VHFHSZ	39
Class “B” Permits Issued in ZIP 91364 (Project Vicinity) Since 2023	16
ZAD / Class 1 CUP Applications Waiving the 20-Foot Roadway Requirement in the VHFHSZ Since 2020	196
Of Those, New Construction on Previously Vacant Lots	139
Parcel Map Applications in the VHFHSZ Since 7/1/2021	32
Private-Street (Deemed Approved Private Street) Applications in the VHFHSZ Since 7/1/2021	28
Additional Pending Cumulative Projects on the Same Roadway Network	300+ units (Woodland Hills C.C.) plus 4204 N. Saltillo

<sup>21</sup> List of Parcel Map applications within the VHFHSZ since July 1, 2021 (drawn from publicly available case-tracking records). The dataset reflects 32 such applications, all of which are within a State-mapped VHFHSZ. A copy is attached as **Exhibit 12**.

<sup>22</sup> List of Private Street (Deemed Approved Private Street) applications within the VHFHSZ since July 1, 2021. The dataset reflects 28 such applications, all of which are within a State-mapped VHFHSZ. A copy is attached as **Exhibit 13**.

Each of these categories represents successive City approvals of development of the same general type — residential intensification on substandard hillside streets within a State-mapped VHFHSZ — in the same place over time. Under *Berkeley Hills* and *Aptos Residents Ass’n*, once an existing cumulative impact is established by substantial evidence, the fair-argument test applies to determine whether the Project will contribute to that impact. The Project will: it adds another single-family residence with associated grading, oak removal, and evacuation load to the same overstressed roadway network, in the same hillside community, in violation of the same State Minimum Fire Safe Regulations the City has already failed to apply to all of the approvals catalogued above.

**G. Additional Pending Cumulative Projects on the Same Roadway Network.**

In addition to the 71 permitted hillside projects, the City is concurrently processing two cumulative projects that further compound the same emergency-access, biological-resource, and air-quality impacts:

- **4204 N. Saltillo Street (Case No. ZA-2025-1911-CU1-MSP-DRB-SPCC)** — a proposed new single-family hillside residence located on the very same Substandard Hillside Limited Street as the Project.<sup>23</sup>
- **Woodland Hills Country Club Redevelopment (Case Nos. CPC-2025-6505-DB-DRB-SPPC-PR-VHCA; VTT-84929-VHCA)** — a proposed redevelopment of the adjacent Woodland Hills Country Club golf course (4868 N. Canoga Avenue / 21150 W. Dumetz Road) that contemplates approximately 300 new dwelling units within the same hillside community and the same mapped SMMC Linkage open-space block discussed above.<sup>24</sup>
- **The Federation of Hillside and Canyon Associations Pattern-and-Practice Lawsuit (LASC Case No. 25STCP04981)** — filed by this firm on December 23, 2025 — expressly documents the City’s recurring approval of new-construction hillside projects in violation of the State Minimum Fire Safe Regulations and

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<sup>23</sup> City of Los Angeles, Department of City Planning, Case No. ZA-2025-1911-CU1-MSP-DRB-SPCC, 4204 N. Saltillo Street (proposed new single-family hillside residence). Project information available at <https://planning.lacity.gov/pdiscaseinfo>. A copy of the publicly available case summary is attached as **Exhibit 14**.

<sup>24</sup> City of Los Angeles, Department of City Planning, Case Nos. CPC-2025-6505-DB-DRB-SPPC-PR-VHCA and VTT-84929-VHCA, Woodland Hills Country Club Redevelopment, 4868 N. Canoga Avenue / 21150 W. Dumetz Road (proposing approximately 300 housing units within the same hillside community). Project page available at <https://planning.lacity.gov/pdiscaseinfo>. A copy of the publicly available case summary is attached as **Exhibit 15**.

identifies dozens of such projects within and adjacent to the same VHFHSZ that contains 4230 N. Saltillo Street.<sup>25</sup>

These pending and recently approved cumulative projects, layered atop the 71 hillside permits already issued in zip code 91364 since July 1, 2021, establish that the cumulative impact of successive single-family hillside development on this roadway network is severe and ongoing. The Project will incrementally but materially contribute to that cumulative impact, both through its construction-phase emissions and oak removal and through the additional vehicle trips, evacuation load, and ignition sources its long-term occupancy will introduce on a roadway that already fails the State Minimum Fire Safe Regulations' width and grade standards.

### **III. The Project Will Contribute to Significant Cumulative Impacts to the Newly-Listed Threatened Mountain Lion DPS.**

On February 11-12, 2026, the California Fish and Game Commission unanimously voted to list the Central Coast and Southern California mountain lion populations — including the Santa Monica Mountains population — as a *threatened* species under the California Endangered Species Act.<sup>26</sup> CDFW's Status Review identified habitat loss and fragmentation from “historical and ongoing transportation infrastructure development (including residential and commercial structures)” as the principal driver of the population's decline, warning that “ongoing residential development will exacerbate existing barriers to mountain lion movement, effectively rendering existing pathways less permeable, and in some areas may lead to complete isolation.”<sup>27</sup> The Attorney General has likewise emphasized that “introducing more people — via additional development — into a flammable landscape” both “puts more people in harm's way” and accelerates habitat loss for sensitive species.<sup>28</sup>

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<sup>25</sup> Verified Petition for Writ of Mandate, *Federation of Hillside and Canyon Associations, Inc. v. City of Los Angeles*, Los Angeles County Superior Court Case No. 25STCP04981 (filed Dec. 23, 2025). A true and correct copy of the Petition is attached as **Exhibit 16**.

<sup>26</sup> California Department of Fish and Wildlife, News Release, “California Fish and Game Commission Finds CESA Protections Warranted for Southern California and Central Coast Mountain Lion” (Feb. 20, 2026), available at <https://wildlife.ca.gov/News/Archive/california-fish-and-game-commissionfinds-cesa-protections-warranted-forsouthern-californiaandcentral-coastmountain-lion>.

<sup>27</sup> California Department of Fish and Wildlife, Status Review of the Petitioned Southern California / Central Coast ESU of Mountain Lion in California (December 2025), at pp. 79 (“The main threats affecting mountain lions in the proposed DPS are habitat loss and fragmentation from historical and ongoing transportation infrastructure development (including residential and commercial structures . . . )”), available at <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=241267&inline>.

<sup>28</sup> California Office of the Attorney General, Best Practices for Analyzing and Mitigating Wildfire Impacts of Development Projects Under the California Environmental Quality Act (Oct. 2022), at pp. 4, available at [https://stateimpactcenter.org/files/AGActions\\_Wildfire-guidance-final-3.pdf](https://stateimpactcenter.org/files/AGActions_Wildfire-guidance-final-3.pdf).

The Project parcel falls within the State-mapped Southern California / Central Coast Mountain Lion DPS, within the mapped SMMC Linkage Map, and immediately adjacent to the Woodland Hills Country Club open-space block to the east — the very block proposed for 300+ unit redevelopment under Case Nos. CPC-2025-6505 / VTT-84929-VHCA. The project’s construction will result in: (i) the removal of mature coast live oak canopy that contributes to the local landscape linkage; (ii) the introduction of permanent two-story structures, retaining walls, and a swimming pool that will function as physical and behavioral barriers to mountain lion and mesopredator movement; and (iii) the addition of new sources of artificial light, noise, and human activity within the linkage. When that incremental impact is considered together with the 14 single-family residences, 29 ADUs, and the 300+ unit golf-course redevelopment also occurring within the same hillside community, the cumulative loss of canopy and connectivity is precisely the type of “extinction-vortex” trajectory that CDFW concluded warrants CESA protection.

Appellant has separately submitted, herewith, video and photographic documentation of mountain lion presence within the adjacent open-space block. That documentation, considered together with the City’s own “Medium” ZIMAS classification and the recent CESA listing, more than satisfies the fair-argument standard with respect to the cumulative impact of the Project on this threatened species.

**A. The Project Vicinity Hosts Active Mountain Lion and Bobcat Use — Captured on Video and Photograph by Residents in the Immediate Neighborhood.**

Beyond the regulatory framework discussed above, Appellant submits direct, contemporaneous, photographic and video evidence of mountain lion and bobcat use of the Project vicinity. This evidence — captured by Appellant’s members and other residents on personal phones and Nest residential security cameras — establishes, as a factual matter, that the parcels surrounding the Project Site function as active mountain lion and bobcat habitat and movement corridor, and that the City’s and South Environmental’s contrary conclusions are not supported by substantial evidence.

1. Daylight Mountain Lion in Residential Driveway. **Exhibit 4** is a daylight video recording of an adult mountain lion (*Puma concolor*) walking across a residential driveway in the immediate Project vicinity. A representative still frame is reproduced below.<sup>29</sup>

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<sup>29</sup> Video Recording, Mountain Lion in Residential Driveway Adjacent to the Project Site, Woodland Hills, CA 91364, captured by neighborhood resident (color daylight footage; the lion is visible walking across a residential driveway adjacent to the Saltillo Street roadway network). The complete video is linked as **Exhibit 4**.



**Figure 1:** Still frame from **Exhibit 4** showing an adult mountain lion in a residential driveway in the immediate Project vicinity (Woodland Hills, CA 91364).

2. Bobcat at Residential Gate. **Exhibit 5** is a daylight video recording from a residential security camera in the immediate Project vicinity showing a bobcat (*Lynx rufus*) at the entry gate of a single-family home. A representative still frame is reproduced below.<sup>30</sup>



**Figure 2:** Still frame from **Exhibit 5** showing a bobcat at a residential gate in the immediate Project vicinity. The bobcat is an indicator of functional wildlife habitat connectivity.

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<sup>30</sup> Video Recording, Bobcat (*Lynx rufus*) at Residential Gate, Project vicinity, Woodland Hills, CA 91364, captured by neighborhood resident security camera. The bobcat is an indicator species for functional wildlife habitat connectivity. The complete video is linked as **Exhibit 5**.

3. Mountain Lion at Active Construction Site. **Exhibit 6** is a Nest residential security-camera recording, captured at night in the immediate Project vicinity, showing an adult mountain lion walking across a foundation slab at an *active hillside construction site* — with construction equipment, including an excavator and a skid steer, plainly visible in the background. This is direct, dispositive evidence that mountain lions are not merely *present* in the Project vicinity but are actively traversing — and being displaced by — the very type of new hillside residential construction the Project will introduce. A representative still frame is reproduced below.<sup>31</sup>



**Figure 3:** Still frame from **Exhibit 6** — Nest residential security camera, nighttime — showing an adult mountain lion walking across a foundation slab at an active hillside construction site in the immediate Project vicinity (Woodland Hills, CA 91364). Construction equipment (excavator and skid steer) is plainly visible in the background.

An additional documented sighting within the same hillside community include a Nest residential security-camera recording from the Project vicinity capturing nighttime wildlife activity at a residential porch (**Exhibit 7**).<sup>32</sup> Taken together, these contemporaneous video records establish — by direct observational evidence rather than inference — that the Project vicinity is *actively used* by both adult mountain lions and bobcats, including during the construction phase of nearby hillside development. The South Environmental Report’s contrary

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<sup>31</sup> Video Recording, Mountain Lion at Active Construction Site, Project vicinity, Woodland Hills, CA 91364, captured on Nest residential security camera at night. The lion is visible walking across an unfinished foundation slab with construction equipment (excavator, skid steer) staged in the background. The complete video is linked as **Exhibit 6**.

<sup>32</sup> Video Recording, Wildlife Visit to Residential Porch (Nest cam), Project vicinity, Woodland Hills, CA 91364, captured at night. The complete video is linked as **Exhibit 7**.

one-sentence conclusion that the Project parcel “would not be useful habitat” for mountain lion is not merely conclusory; it is contradicted by the direct video record.

CDFW’s 2026 Status Review specifically warns that residential construction in the wildland-urban interface *displaces* mountain lions from active habitat blocks, fragments connectivity between landscape linkages, and exposes lions to vehicle strikes, rodenticides, and human-conflict mortality. **Exhibit 6** — capturing an adult mountain lion physically traversing an active construction site at night within the same hillside community as the Project — is contemporaneous, site-specific, and dispositive evidence that the Project will contribute, cumulatively, to that very impact pathway. It is precisely the type of substantial evidence that renders the Class 3 categorical exemption unavailable.

**IV. The Project’s Non-Compliance with the State Minimum Fire Safe Regulations Is Itself a CEQA Impact and Cannot Be “Kicked Down the Road” to LADBS or LAFD.**

**A. The Project Indisputably Fails the State Minimum Fire Safe Regulations.**

As established by the expert engineering report of Brandon Araujo, P.E., previously submitted in this matter, Saltillo Street and its connecting hillside roadways do not meet the minimum 20-foot, two-lane width or the maximum 16-percent grade required by 14 C.C.R. §§ 1273.01(a) and 1273.03(a).<sup>33</sup> The Project triggers the State Minimum Fire Safe Regulations because it requires “a Building permit for new construction not relating to an existing Structure” in a Very High Fire Hazard Severity Zone after July 1, 2021. (14 C.C.R. § 1270.03(c)(2-3).)<sup>34</sup> The City has neither (i) brought the access roadways into compliance, (ii) processed a written Exception under 14 C.C.R. § 1270.07 with documented “Same Practical Effect” mitigations, nor (iii) provided notice of the Project to CAL FIRE as required by 14 C.C.R. § 1270.04(a). The South Valley APC nevertheless sustained the categorical exemption on the theory that LAFD will ‘impose any necessary fire conditions later, when permits are issued.’ That theory is legally untenable.

**B. The Federation of Hillside and Canyon Associations Verified Petition Specifically Names 4230 N. Saltillo Street as One of the Violations It Challenges.**

Critically, the Federation of Hillside and Canyon Associations’ (the “Hillside Federation”) Petition does not merely identify a generic pattern; it **specifically names 4230 N. Saltillo Street** — the very Project at issue in this appeal — as one of the violations the lawsuit is challenging. Paragraph 84 of the Verified Petition recites that, on March 21, 2025, the Hillside Federation served the City with a written demand letter “cit[ing] violations at **4230 N. Saltillo**

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<sup>33</sup> Brandon Araujo, P.E., Engineering Analysis Report – 4230 Saltillo Street (originally submitted with Appeal Justification dated January 3, 2025; reincorporated in the March 9, 2026, appeal). A true and correct copy is attached as **Exhibit 17** (“Araujo Report”).

<sup>34</sup> 14 C.C.R. §§ 1270.00 et seq., State Minimum Fire Safe Regulations, available at <https://www.law.cornell.edu/regulations/california/title-14/division-1.5/chapter-7/subchapter-2>.

**Street**, 504 W. Avenue 44, 12001 Chalon Road and 10453 Sandal Lane.”<sup>35</sup> In other words, before the South Valley APC adopted the Categorical Exemption that is the subject of this appeal, the City was on actual written notice — from this firm and from the Hillside Federation — that this Project does not comply with the State Minimum Fire Safe Regulations. The City’s decision to nevertheless adopt a “no significant impact” finding under a Class 3 categorical exemption is, on its face, an unreasonable response to substantial evidence of fire-safety non-compliance. The mere existence of a pending pattern-and-practice writ proceeding identifying this very Project precludes the City’s use of any categorical exemption.

The Hillside Federation Petition further documents — in granular detail — exactly the kind of multi-departmental “kick-the-can” deferral the City is now attempting in this Project. Paragraphs 66–82 catalogue, by department and by category, the City’s systematic failure to apply the State Minimum Fire Safe Regulations: **Department of City Planning** does not check for compliance when issuing building permits or approving entitlements; **Bureau of Engineering** does not check for compliance when issuing permits to extend or modify roadways; **LADBS** does not check for compliance when issuing building permits; and **LAFD** does not check for compliance when conditioning or approving developments. The City does not notify CAL FIRE, does not make required findings, and does not impose mitigation that achieves the “Same Practical Effect.”<sup>36</sup>

Most directly relevant to the Saltillo Street roadway network, the Hillside Federation Petition includes — at Paragraph 82 and its Exhibit 8 — an **engineering analysis prepared by a professional civil engineer for a development at 4320 Saltillo Street** (the same street as this Project), demonstrating that **a 24-foot roadway with permitted on-street parking provides only 16 feet of usable travel-lane width** — “far too narrow to accommodate simultaneous two-way traffic for emergency vehicles and evacuating civilians” in violation of 14 C.C.R. § 1273.01(a).<sup>37</sup> That engineering analysis applies, by direct extension, to 4230 N. Saltillo Street:

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<sup>35</sup> Hillside Federation Petition ¶ 84 (“On March 21, 2025, the Hillside Federation notified the City of its failure to enforce the Fire Safe Regulations and demanded compliance [with] its road width, driveway width and building setback standards. This letter cited violations at 4230 N. Saltillo Street, 504 W. Avenue 44, 12001 Chalon Road and 10453 Sandal Lane.”).

<sup>36</sup> Hillside Federation Petition ¶¶ 66–82 (“The City’s failure to apply the Fire Safe Regulations to the Sandal Lane Project is just one of countless examples of City approvals in the VHFHSZ from July 1, 2021 to present in violation of the Fire Safe Regulations. . . . The City fails to apply the Fire Safe Regulations to the issuance of building permits . . . to the issuance of ‘B’ Permits . . . to the approval of Zoning Administrator Determinations or Class 1 Conditional Use Permits . . . to the approval of tentative and parcel maps . . . to the approval of access gates . . . [and] fails to comply with the procedures of the Fire Safe Regulations for granting Exceptions, including the requirement to impose mitigation ensuring the Same Practical Effect and to send notice to CAL FIRE.”).

<sup>37</sup> Hillside Federation Petition ¶ 82 & Exh. 8 (engineering analysis prepared by a professional civil engineer for a development at 4320 Saltillo Street — the same street as the

the same street network, the same on-street parking conditions, the same VHFHSZ — and now the same Project added to that already non-compliant evacuation roadway.

***Against this backdrop, the City’s deferral theory is unlawful for at least four independent reasons:***

On December 23, 2025, this firm filed *Federation of Hillside and Canyon Associations, Inc. v. City of Los Angeles*, LASC Case No. 25STCP04981 — a verified petition for writ of mandate that documents, in granular detail, the City’s recurring practice of approving new-construction projects in the VHFHSZ without compliance with the State Minimum Fire Safe Regulations, and then claiming that LADBS or LAFD will impose any necessary fire conditions “to the extent feasible” at the building-permit stage.<sup>38</sup> The Petition is incorporated herein by reference.

1. No “Feasibility” Standard Exists.

The City’s standard formulation — that LADBS or LAFD will require fire-safety upgrades “to the extent feasible” — substitutes a non-existent “feasibility” test for the mandatory “Same Practical Effect” standard codified at 14 C.C.R. § 1270.01(aa). The State Minimum Fire Safe Regulations do not authorize deviations because compliance is inconvenient or expensive; they require, as a non-discretionary matter, that any deviation provide “the same practical effect as these regulations toward providing Defensible Space” for firefighter safety, emergency access, and civilian egress.

2. LAFD Does Not Actually Review Projects for State Minimum Fire Safe Regulation Compliance.

As established in the Hillside Federation Petition, LAFD’s plan-check process reviews projects for compliance with the California Building Code and the City Fire Code — codes that are *less restrictive* than the State Minimum Fire Safe Regulations. The City’s repeated assertion that compliance with Title 24 satisfies Public Resources Code §§ 4290–4291 is contradicted by 14 C.C.R. § 1270.05, which permits local regulations to displace the state minimums only where they *equal or exceed* them. By the City’s own admission in its prior pleadings, the City Fire Code does not equal or exceed the State Minimum Fire Safe Regulations. The LAMC, by

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Project — concluding that a 24-foot roadway with on-street parking provides only 16 feet of usable travel-lane width, “far too narrow to accommodate simultaneous two-way traffic for emergency vehicles and evacuating civilians,” in violation of 14 C.C.R. § 1273.01(a)).

<sup>38</sup> *Federation of Hillside and Canyon Associations, Inc. v. City of Los Angeles*, LASC Case No. 25STCP04981, Verified Petition for Writ of Mandate ¶¶ 1–18, 45–79 (filed Dec. 23, 2025) (documenting the City’s pattern and practice of deferring compliance with the State Minimum Fire Safe Regulations to LAFD’s ministerial review at the building-permit stage).

contrast, expressly incorporates the State Minimum Fire Safe Regulations at LAMC § 57.4908.1.<sup>39</sup>

3. Deferral Bypasses CAL FIRE Oversight and the Mandatory Exception Process.

If the Project cannot meet the strict roadway-width or grade standards, the only lawful mechanism for deviation is a written, case-by-case Exception under 14 C.C.R. § 1270.07, supported by evidence of “Same Practical Effect” mitigations, and forwarded to CAL FIRE unit headquarters. There is no evidence in the record that any such Exception has been requested, granted, or transmitted to CAL FIRE in this matter. The City’s “kick-the-can” approach therefore both bypasses CAL FIRE oversight and forecloses the public review that 14 C.C.R. § 1270.07 contemplates.

4. CEQA Independently Prohibits Deferred Compliance Where Front-End Review Is Required.

Even apart from the Fire Safe Regulations’ own command, CEQA does not allow a lead agency to dispense with environmental review by promising that some other department will impose mitigation later. (*Communities for a Better Environment v. City of Richmond* (2010) 184 Cal.App.4th 70, 92–93<sup>40</sup>; *Endangered Habitats League, Inc. v. County of Orange* (2005) 131 Cal.App.4th 777, 793–794<sup>41</sup>.) Where, as here, an entire category of mandatory state regulation is being avoided by deferring it to a phase at which CEQA review will not occur and at which the Public will not have a right to be heard, the deferral is doubly invalid.

**C. The Project’s Fire Safe Non-Compliance Is Both an Unusual Circumstance and a Cumulative Impact.**

The Project’s non-compliance with the State Minimum Fire Safe Regulations is independently fatal to the Class 3 categorical exemption under both the unusual-circumstances exception (CEQA Guidelines § 15300.2(c)) and the cumulative-impact exception (§ 15300.2(b)). The Project sits within a State-mapped VHFHSZ, on a Substandard Hillside Limited Street that the LOD itself acknowledges to be less than 20 feet wide, with grades and curve radii that fail 14 C.C.R. §§ 1273.01–1273.04. As demonstrated by the Hillside Federation Petition, this is not an isolated occurrence but rather one of dozens of similarly non-compliant approvals issued by the

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<sup>39</sup> LAMC § 57.4908.1 citing to California Fire Code §§ 4908, et seq (“All residential building construction within a VHFHSZ shall comply with the State Minimum Fire Safe Regulations.”), available at [https://codelibrary.amlegal.com/codes/los\\_angeles/latest/lamc/0-0-0-363615](https://codelibrary.amlegal.com/codes/los_angeles/latest/lamc/0-0-0-363615); California Fire Code §§ 4908, et seq. available at <https://up.codes/viewer/california/ca-fire-code-2022/chapter/49/requirements-for-wildland-urban-interface-fire-areas#4908>.

<sup>40</sup> *Communities for a Better Environment v. City of Richmond* (2010) 184 Cal.App.4th 70, 92–93 (impermissible deferral of mitigation measures violates CEQA).

<sup>41</sup> *Endangered Habitats League, Inc. v. County of Orange* (2005) 131 Cal.App.4th 777, 793–794 (lead agency cannot rely on future, unspecified mitigation as a substitute for present environmental review).

City under an unlawful pattern and practice. The cumulative bottleneck — narrowing emergency access for incoming fire apparatus while simultaneously increasing the evacuation load on the same single travel lane — is precisely the cumulative impact that the Board of Forestry, the Legislature, and the State Attorney General have warned against. Approving yet another non-compliant residence on the same street will materially worsen that cumulative bottleneck.

**V. Conclusion and Request for Action.**

For each of the foregoing independent reasons, the Class 3 Categorical Exemption adopted for the Project is invalid. The location exception (Guidelines § 15300.2(a)) applies because the Project lies within the Santa Monica Mountains Zone, the Southern California / Central Coast Mountain Lion DPS, an SMMC Linkage, the City’s mapped Protected Areas for Wildlife, and a State-mapped Very High Fire Hazard Severity Zone. The cumulative-impact exception (Guidelines § 15300.2(b)) applies because the Project will contribute to the cumulative impact of 71 new-construction hillside permits issued in the same zip code since July 1, 2021, the 39 substandard-road B-Permits issued citywide in the VHFHSZ, the 196 ZAD/CU1 waivers of the 20-foot roadway requirement filed since 2020, the 32 parcel-map applications and 28 private-street applications in the VHFHSZ, the dozens of additional non-compliant approvals documented in *Federation of Hillside* — a pending writ proceeding that **specifically names this Project as one of the cited violations** — the pending 4204 N. Saltillo Street and 300+ unit Woodland Hills Country Club projects, and the regional erosion of mountain-lion habitat connectivity. The unusual-circumstances exception (Guidelines § 15300.2(c)) applies because of the Project’s confluence of substandard fire access, regulatory non-compliance, location within a threatened-species DPS, and removal of locally protected coast live oaks.

Appellant respectfully requests that the PLUM Committee recommend that the City Council **(1)** grant the appeal, **(2)** rescind the Class 3 Categorical Exemption adopted under ENV-2023-1207-CE, and **(3)** require the preparation of an appropriate environmental review document (Mitigated Negative Declaration or Environmental Impact Report) addressing the biological-resource, cumulative, fire-safety, and emergency-access impacts identified herein.

Appellant reserves the right to supplement this letter prior to the City Council’s final action and incorporates by reference all prior submittals filed in this matter, including the January 3, 2025, December 1, 2025, and March 9, 2026 appeal justification letters and all attached exhibits, the South Valley APC hearing PowerPoint presentation, and any video, photographic, or expert evidence submitted concurrently herewith.

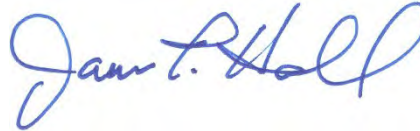
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Thank you for your consideration of this matter. I may be contacted at [jamie.hall@channellawgroup.com](mailto:jamie.hall@channellawgroup.com) if you have any questions, comments, or concerns.

Sincerely,



Jamie T. Hall

**Encls.:**

- Exhibit 1 Cashen Report – Independent Biological Resources Review of 4230 N. Saltillo Street Project; Curriculum Vitae and Statement of Qualifications of Scott Cashen, M.S.
- Exhibit 2 ZIMAS parcel profile for 4230 N. Saltillo Street
- Exhibit 3 Santa Monica Mountains Conservancy Linkage Map
- Exhibit 4 Mountain Lion Daylight Driveway Sighting video link
- Exhibit 5 Bobcat at Residential Gate video link
- Exhibit 6 Mountain Lion at Active Construction Site, Nest cam video link
- Exhibit 7 Wildlife Visit to Residential Property, Nest cam video link
- Exhibit 8 Hillside Building Permits in ZIP Code 91364
- Exhibit 9 List of Class “B” Permits Issued by the City of Los Angeles (full dataset, 915 permits citywide)
- Exhibit 10 List of City of Los Angeles Class “B” Permits issued in ZIP Code 91364 (Project vicinity)
- Exhibit 11 List of ZAD / Class 1 CUP Applications Waiving the 20-Foot Roadway Requirement
- Exhibit 12 List of Parcel Map Applications in the VHFHSZ
- Exhibit 13 List of Private-Street (Deemed Approved Private Street) Applications in the VHFHSZ
- Exhibit 14 Case Summary, ZA-2025-1911-CU1-MSP-DRB-SPCC (4204 N. Saltillo Street)
- Exhibit 15 Case Summary, CPC-2025-6505 / VTT-84929-VHCA (Woodland Hills Country Club Redevelopment)
- Exhibit 16 Verified Petition for Writ of Mandate, *Federation of Hillside and Canyon Associations, Inc. v. City of Los Angeles*, LASC No. 25STCP04981 (Dec. 23, 2025)
- Exhibit 17 Brandon Araujo, P.E., Engineering Analysis Report – 4230 Saltillo Street

**cc:** Honorable Bob Blumenfield, Council District 3 ([councilmember.blumenfield@lacity.org](mailto:councilmember.blumenfield@lacity.org))  
Renata Ooms, City Planner ([renata.ooms@lacity.org](mailto:renata.ooms@lacity.org))  
Tiffany Corales, Planning Assistant ([tiffany.corrales@lacity.org](mailto:tiffany.corrales@lacity.org))  
Matthew Meehan, Deputy City Attorney ([matthew.meehan@lacity.org](mailto:matthew.meehan@lacity.org))

## Communication from Public

**Name:** Deyanira Sánchez  
**Date Submitted:** 05/05/2026 09:21 PM  
**Council File No:** 26-0412  
**Comments for Public Posting:** Please see the attached letter.

Deyanira Sánchez, DDS  
CEQA appeal letter

May 5, 2026

Los Angeles City Council  
Planning and Land Use Management Committee 200 North  
Spring Street  
Los Angeles, CA 90012  
clerk.cps@lacity.org [clerk.PLUMCommittee@lacity.org](mailto:clerk.PLUMCommittee@lacity.org)

**Re: Support for CEQA Appeal; 4230 N. Saltillo Street;  
Case Nos.: ZA-2023-1206-ZAD-DRB-SPP-MSP-HCA;  
ENV-2023-1207-CE; Council File No. 26-0412 (“Project”)**

Deyanira Sánchez, DDS  
CEQA appeal letter

Dear Members of the Planning and Land Use Management Committee,

I hope you are doing well, and thank you for your time and service to our community.

I am a neighboring resident writing regarding the proposed development on the parcel adjacent to my property in Woodland Hills. I understand the desire to thoughtfully develop property, and I appreciate the effort that goes into planning these projects. At the same time, I would like to share several concerns about the current proposal and the CEQA exemption that has been granted.

The lot contains nine mature native oak trees, which are an important part of the character and environmental health of our neighborhood. The proposal to remove two of these trees raises concerns not only about their loss, but also about potential impacts to the remaining trees. Oak root systems are often interconnected, and disturbance to one area can affect the stability and long-term health of nearby trees.

In addition, this property has functioned as a small but meaningful natural habitat. There have been mountain lion sightings in the immediate area, along with other wildlife. Changes to the landscape, including tree removal and grading, may disrupt these patterns and reduce available habitat.

I would also like to raise practical safety concerns. The road serving this area is narrow and winding, with limited visibility in certain sections. Increased

construction activity—and potentially increased long-term traffic—could create challenges for ingress and egress, emergency access, and overall neighborhood safety. This is something many of us who live here navigate daily, and even modest increases in traffic can have a noticeable impact.

Fire safety is another important consideration. This area is susceptible to wildfire risk, and the presence of mature oak trees can play a role in slope stability, microclimate regulation, and in some cases acting as a buffer compared to more combustible brush when properly maintained. Construction activity, vegetation removal, and increased occupancy all have the potential to affect fire behavior, evacuation safety, and emergency response access. Given the narrow roadway and existing conditions, these risks deserve careful evaluation.

Given these considerations, I respectfully ask that the Committee take a closer look at whether the CEQA exemption fully accounts for these combined impacts. A more detailed environmental and site-specific review—including arborist input, wildlife considerations, fire safety analysis, and roadway safety—would provide reassurance that the project can move forward in a way that is both responsible and compatible with the surrounding community.

Thank you again for your attention to this matter and for your continued work on behalf of our neighborhood.

Sincerely,

Deyanira Sánchez DDS  
4246 Saltillo street  
Woodland Hills, Ca.91364  
818-648-5309

## Communication from Public

**Name:** Tristan Thomas  
**Date Submitted:** 05/05/2026 01:28 PM  
**Council File No:** 26-0412  
**Comments for Public Posting:** Please see the attached letter.

## **Michele Ringler and Tristan Thomas**

4201 Alhama Drive  
Woodland Hills, CA 91364  
micheleringler@mac.com

May 3, 2026

Los Angeles City Council

Planning and Land Use Management Committee

200 North Spring Street

Los Angeles, CA 90012

[clerk.cps@lacity.org](mailto:clerk.cps@lacity.org)

[Clerk.PLUMCCCommittee@lacity.org](mailto:Clerk.PLUMCCCommittee@lacity.org)

Dear City Council and PLUM Committee Members,

My name is Michele Ringler and my partner, Tristan Thomas, and I live in the Girard Tract neighborhood in Council District 3. I'm writing to urge you to grant the California Environmental Quality Act (CEQA) appeal filed by the Girard Tract Community Preservation regarding the proposed construction at 4230 Saltillo in Woodland Hills, by investment realtor, Mehran Tebyani. The city cannot rely on "categorical exemptions" for this project when it endangers our environment and the neighborhood's public safety. The proposed construction on a substandard slope of land would entail cutting down two oak trees and an iconic eucalyptus tree (one of the largest in the neighborhood), thus destroying the aesthetic of the canopy (which is visible from Mulholland), and habitat to thousands of birds and wildlife, while also, uprooting a complex root system. The lot is 4670.5 square feet and the proposed dwelling is 2472 square feet, including a pool, which is excessive on a sloped lot. The property abuts a steep hillside, and there is a concern that by removing the two protected oaks and 726 cubic yards of soil, that the hillside could become destabilized. The three story home will take up the majority of the land. There is little space remaining to meet the oak replanting requirement, with 7 oak trees already on the property. In addition, the eucalyptus tree slated for removal is on city land, and is being removed to "widen" the road. This project fails to meet the required 20-foot minimum road width on a substandard road and is a highly significant fire safety hazard. Approving new construction could potentially trap residents in the event of a wildfire.

We urge this committee to not allow this project to proceed without an Environmental Impact Report. We request that you grant the appeal, revoke the CEQA clearance and require an environmental review prior to any construction. It's the least that should be done to ensure the public safety and the safety of the Girard tract residents, as well as to ensure the integrity and stability of the environmental ecosystem in the Girard Tract.

Thank you for your time and attention to this very important matter.

Sincerely yours,

Michele Ringler and Tristan Thomas

- See photos below.







## Communication from Public

**Name:** Robert England  
**Date Submitted:** 05/05/2026 01:30 PM  
**Council File No:** 26-0412  
**Comments for Public Posting:** Please see the attached letter.

Los Angeles City Council

Planning and Land Use Management Committee

200 North Spring Street

Los Angeles, CA 90012

clerk.cps@lacity.org

Clerk.PLUMCommittee@lacity.org

I am submitting this letter in **formal opposition** to the proposed development at 4230 Saltillo Street. As the adjacent property owner, I believe the project raises substantial concerns under the Los Angeles Municipal Code, the Protected Tree Ordinance, the Mulholland Scenic Parkway Specific Plan, and CEQA.

### **1. Protected Tree Ordinance – LAMC 12.21 and Ordinance 167,494**

The proposal requires removal of multiple **protected Quercus agrifolia (Coast Live Oak) trees**, including specimens approximately 8 feet in diameter and estimated to be nearly 100 years old. Under **Los Angeles Ordinance 167,494**, oak trees within one-half mile of Mulholland Drive are subject to strict protection. The project site is **0.3 miles from Mulholland Drive**, placing these trees squarely within the protected zone.

Removal of these trees would violate the intent of the ordinance and would require findings that cannot be supported, including: • That removal is unavoidable; • That no feasible alternative exists; • That removal will not cause significant erosion, slope instability, or habitat loss.

Given the steep hillside and the stabilizing root systems of these mature oaks, such findings cannot be reasonably made.

### **2. Hillside Stability and Safety – LAMC 12.21 C.10 & 12.21 A.17**

Our home sits directly downslope from the proposed structure. The Protected Tree Report must address whether removal of these mature oaks would compromise slope stability. Under **LAMC 12.21 C.10**, development in hillside areas must not create or worsen hazardous conditions. The removal of deep-rooted oaks on a steep grade presents a clear risk of: • Soil movement and erosion; • Increased runoff; • Compromised structural stability for adjacent parcels.

### **3. Fire Zone Access – LAMC 57.503 & Narrow Substandard Roadway**

Saltillo Street is a **substandard hillside roadway** with no sidewalks, no shoulder, and no ability to widen. Under **LAMC 57.503**, adequate emergency access must be maintained at all times in Very High Fire Hazard Severity Zones. Construction staging, heavy equipment, and road closures on this narrow street would impede emergency response and evacuation routes.

This is not a hypothetical concern—this area has a documented history of wildfire risk.

#### **4. Mulholland Scenic Parkway Specific Plan – Environmental and Visual Resource Protection**

The project lies within the **Mulholland Scenic Parkway Specific Plan** regulatory area. The Plan requires that development: • Preserve natural topography; • Protect mature native trees; • Avoid significant alteration of natural landforms; • Maintain the visual character of the Scenic Parkway.

Removing multiple protected oaks on a small, steep lot is inconsistent with these requirements.

#### **5. CEQA – Categorical Exemption Inapplicable**

The Environmental Case (ENV-2023-1207-CE) appears to rely on a Categorical Exemption. However, CEQA Guidelines §15300.2 prohibit exemptions where: • There is a **reasonable possibility of significant environmental impacts** (e.g., tree removal, slope destabilization); • The project is located in a **sensitive environment** (protected trees, hillside, fire zone); • The project contributes to **cumulative impacts** in a constrained hillside area.

Given the protected trees, slope conditions, and fire-zone access issues, a Categorical Exemption is not appropriate.

#### **6. History of Infeasibility**

The previous owner spent more than 20 years attempting to obtain approvals and ultimately abandoned the effort due to the site's constraints. The new owner was informed of the protected trees and the development challenges but dismissed these concerns, stating he "knows people." This raises concerns about attempts to circumvent established environmental protections.

For all of the reasons above, I respectfully request that the City **deny any request** that would authorize removal of protected trees or allow development that compromises hillside stability, fire-zone safety, or the environmental integrity of the Mulholland Scenic Parkway area.

Thank you for your consideration.

Sincerely, **Robert England** 4190 Saltillo St. Woodland Hills, CA 91364 (818) 203-1639  
mrbobuk@aol.com

## Communication from Public

**Name:** Maksym Pukhalevych  
**Date Submitted:** 05/05/2026 01:16 PM  
**Council File No:** 26-0412  
**Comments for Public Posting:** Please see the attached letter.

Maksym Pukhalevych  
4238 Saltillo St  
Woodland Hills, CA, 91364  
mpuhalevich@gmail.com

April 30, 2026

**VIA EMAIL AND ELECTRONIC UPLOAD**

Los Angeles City Council  
Planning and Land Use Management Committee  
200 North Spring Street  
Los Angeles, CA 90012  
clerk.cps@lacity.org  
Clerk.PLUMCommittee@lacity.org

**Re: Support for CEQA Appeal; 4230 N. Saltillo Street;  
Case Nos.: ZA-2023-1206-ZAD-DRB-SPP-MSP-HCA; ENV-2023-1207-CE;  
Council File No. 26-0412 ("Project")**

Dear City Council and PLUM Committee Members:

My name is Maksym Pukhalevych. I am a resident of Woodland Hills. As a concerned member of the local community, I am writing to strongly urge you to grant the California Environmental Quality Act ("CEQA") appeal filed by Girard Tract Community Preservation ("Appellant") regarding the proposed development at 4230 N. Saltillo Street ("Project"). The City cannot legally or ethically rely on a "categorical exemption" for this Project when it clearly threatens our public safety and sensitive environmental resources.

The major issues that necessitate a full environmental review include:

- **Violations of State Fire Safety Laws:** The Project is located in a Very High Fire Hazard Severity Zone ("VHFHSZ"). Expert analysis as submitted by Appellant confirms the Project fails to meet the State Minimum Fire Safe Regulations, as the primary access routes on Saltillo Street do not meet the required 20-foot minimum width and exceed allowable grades. Approving new construction on such substandard roads traps residents and blocks emergency responders during a wildfire—a risk we cannot afford.
- **Illegal Use of CEQA Exemptions:** This Project is ineligible for a "Class 3" exemption. It is located within the Santa Monica Mountain Zone, a statutorily designated environmental resource of critical concern. Furthermore, "unusual circumstances" exist because the site contains a sensitive Coast Live Oak Woodland habitat that will be permanently disrupted. The City's standard tree replacement does not mitigate the permanent loss of this biodiversity.

- **Inadequate Fire Code Compliance:** The Project's landscape plans fail to document required crown separation and defensible space clearances mandated by Chapter 49 of the California Fire Code.
- **Dangerous Cumulative Impacts:** This is not an isolated project. When combined with other recently approved non-compliant developments and massive proposed projects nearby (such as the 300+ units at the Woodland Hills Golf Course), the strain on our undersized, non-compliant roadway network becomes a disaster waiting to happen.

Allowing this Project to proceed without an Environmental Impact Report (EIR) ignores the expert evidence in the record and sets a dangerous precedent for hillside safety. I respectfully request that you grant the appeal, revoke the CEQA clearance, and require the preparation of an appropriate environmental review document.

Sincerely,  
Maksym Pukhalevych

A handwritten signature in black ink, appearing to read 'Maksym Pukhalevych', written over a horizontal line.

## Communication from Public

**Name:** Michele Ringler  
**Date Submitted:** 05/05/2026 01:24 PM  
**Council File No:** 26-0412  
**Comments for Public Posting:** Please see the attached letter.

## **Michele Ringler and Tristan Thomas**

4201 Alhama Drive  
Woodland Hills, CA 91364  
micheleringler@mac.com

May 3, 2026

Los Angeles City Council

Planning and Land Use Management Committee

200 North Spring Street

Los Angeles, CA 90012

[clerk.cps@lacity.org](mailto:clerk.cps@lacity.org)

[Clerk.PLUMCCCommittee@lacity.org](mailto:Clerk.PLUMCCCommittee@lacity.org)

Dear City Council and PLUM Committee Members,

My name is Michele Ringler and my partner, Tristan Thomas, and I live in the Girard Tract neighborhood in Council District 3. I'm writing to urge you to grant the California Environmental Quality Act (CEQA) appeal filed by the Girard Tract Community Preservation regarding the proposed construction at 4230 Saltillo in Woodland Hills, by investment realtor, Mehran Tebyani. The city cannot rely on "categorical exemptions" for this project when it endangers our environment and the neighborhood's public safety. The proposed construction on a substandard slope of land would entail cutting down two oak trees and an iconic eucalyptus tree (one of the largest in the neighborhood), thus destroying the aesthetic of the canopy (which is visible from Mulholland), and habitat to thousands of birds and wildlife, while also, uprooting a complex root system. The lot is 4670.5 square feet and the proposed dwelling is 2472 square feet, including a pool, which is excessive on a sloped lot. The property abuts a steep hillside, and there is a concern that by removing the two protected oaks and 726 cubic yards of soil, that the hillside could become destabilized. The three story home will take up the majority of the land. There is little space remaining to meet the oak replanting requirement, with 7 oak trees already on the property. In addition, the eucalyptus tree slated for removal is on city land, and is being removed to "widen" the road. This project fails to meet the required 20-foot minimum road width on a substandard road and is a highly significant fire safety hazard. Approving new construction could potentially trap residents in the event of a wildfire.

We urge this committee to not allow this project to proceed without an Environmental Impact Report. We request that you grant the appeal, revoke the CEQA clearance and require an environmental review prior to any construction. It's the least that should be done to ensure the public safety and the safety of the Girard tract residents, as well as to ensure the integrity and stability of the environmental ecosystem in the Girard Tract.

Thank you for your time and attention to this very important matter.

Sincerely yours,

Michele Ringler and Tristan Thomas

- See photos below.







## Communication from Public

**Name:** Robert England  
**Date Submitted:** 05/05/2026 02:01 PM  
**Council File No:** 26-0412  
**Comments for Public Posting:** Please see the attached letter.

Los Angeles City Council

Planning and Land Use Management Committee

200 North Spring Street

Los Angeles, CA 90012

clerk.cps@lacity.org

Clerk.PLUMCommittee@lacity.org

I am submitting this letter in **formal opposition** to the proposed development at 4230 Saltillo Street. As the adjacent property owner, I believe the project raises substantial concerns under the Los Angeles Municipal Code, the Protected Tree Ordinance, the Mulholland Scenic Parkway Specific Plan, and CEQA.

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Removal of these trees would violate the intent of the ordinance and would require findings that cannot be supported, including: • That removal is unavoidable; • That no feasible alternative exists; • That removal will not cause significant erosion, slope instability, or habitat loss.

Given the steep hillside and the stabilizing root systems of these mature oaks, such findings cannot be reasonably made.

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The previous owner spent more than 20 years attempting to obtain approvals and ultimately abandoned the effort due to the site's constraints. The new owner was informed of the protected trees and the development challenges but dismissed these concerns, stating he "knows people." This raises concerns about attempts to circumvent established environmental protections.

For all of the reasons above, I respectfully request that the City **deny any request** that would authorize removal of protected trees or allow development that compromises hillside stability, fire-zone safety, or the environmental integrity of the Mulholland Scenic Parkway area.

Thank you for your consideration.

Sincerely, **Robert England** 4190 Saltillo St. Woodland Hills, CA 91364 (818) 203-1639  
mrbobuk@aol.com

## Communication from Public

**Name:** Pluemjit Wilson  
**Date Submitted:** 05/05/2026 02:02 PM  
**Council File No:** 26-0412  
**Comments for Public Posting:** Please see the attached letter.

Pluemjit Wilson  
21311 Las Pilas Road  
Woodland Hills, CA 91364  
pluemjit.wilson@gmail.com

May 4, 2026

**VIA EMAIL AND ELECTRONIC UPLOAD**

Los Angeles City Council  
Planning and Land Use Management Committee  
200 North Spring Street  
Los Angeles, CA 90012  
[clerk.cps@lacity.org](mailto:clerk.cps@lacity.org)  
[Clerk.PLUMCommittee@lacity.org](mailto:Clerk.PLUMCommittee@lacity.org)

**Re: Support for CEQA Appeal; 4230 N. Saltillo Street;  
Case Nos.: ZA-2023-1206-ZAD-DRB-SPP-MSP-HCA; ENV-2023-1207-CE;  
Council File No. 26-0412 ("Project")**

To Whom It May Concern:

My name is Pluemjit Wilson, and I reside at 21311 Las Pilas Road in Woodland Hills, California. I also own the neighboring property located at 21305 Las Pilas Road. As a local resident with a vested interest in the safety and environmental integrity of our community, I am writing to urge the Committee to approve the California Environmental Quality Act ("CEQA") appeal submitted by Girard Tract Community Preservation concerning the proposed development at 4230 N. Saltillo Street.

In my view, the City cannot appropriately rely on a categorical exemption for this Project, as it presents clear risks to both public safety and environmentally sensitive areas.

Several significant concerns demonstrate the need for a comprehensive environmental review:

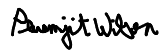
- **Violations of State Fire Safety Laws:** The Project is located in a Very High Fire Hazard Severity Zone ("VHFHSZ"). Expert analysis as submitted by Appellant confirms the Project fails to meet the state's minimum fire safe regulations, as the primary access routes on Saltillo Street do not meet required 20-foot minimum width and exceed allowable grades. Approving new construction on such substandard roads traps residents and blocks emergency responders during a wildfire - a risk we cannot afford.
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- **Inadequate Fire Code Compliance:** The Project's landscape plans failed document required crown separation and defensible space clearances mandated by Chapter 49 of the California Fire Code.

Los Angeles City Council  
Planning and Land Use Management Committee  
May 4 2026

- **Dangerous Cumulative Impacts:** This is not an isolated project. When combined with other recently approved noncompliant developments and massive proposed projects nearby (such as the 300+ units at the Woodland Hills Golf Course), the strain on our undersized, non-compliant roadway network becomes a disaster waiting to happen.

Allowing this Project to proceed without a full Environmental Impact Report disregards substantial evidence and raises serious concerns about precedent for future hillside developments. For these reasons, I respectfully request that the Committee grant the appeal, rescind the exemption, and require preparation of a thorough environmental review.

Sincerely,



Pluemjit Wilson

## Communication from Public

**Name:** Michelle & Erich Randolph  
**Date Submitted:** 05/05/2026 04:01 PM  
**Council File No:** 26-0412  
**Comments for Public Posting:** Please see the attached letter.

May 5, 2026

Los Angeles City Council  
Planning and Land Use Management Committee 200 North Spring Street  
Los Angeles, CA 90012  
clerk.cps@lacity.org [clerk.PLUMCommittee@lacity.org](mailto:clerk.PLUMCommittee@lacity.org)

**Re: Support for CEQA Appeal; 4230 N. Saltillo Street;  
Case Nos.: ZA-2023-1206-ZAD-DRB-SPP-MSP-HCA; ENV-2023-1207-CE; Council File No. 26-0412  
("Project")**

City Council and PLUM Committee Members:

We are writing as the homeowners directly next to the lot at 4230 N. Saltillo Street in the Woodland Hills / Topanga area.

Because we live right alongside this property, any changes there will impact us directly. The lot is small, on a slope, and packed with mature oak trees. Those trees are not just part of the landscape. They are a big part of what is holding everything together on that hillside and creating some separation between properties.

We understand there is a plan to remove two of the oak trees. Even that feels significant given how tight the space is and how interconnected everything looks. From living next to it, it is hard to imagine removing any trees without affecting the others, whether that is through root disturbance, soil changes, or overall stability.

Our biggest concern is what this could mean for our home. We are right there on the slope, so any tree removal and grading or excavation raises real questions for us around erosion or ground movement. This is not just a general concern. It is something that could directly affect our property.

There is also the environmental side of this. We see animals moving through here all the time, including deer, coyotes, and recently a mountain lion in our driveway (SEE IMAGES BELOW). This area clearly functions as part of a natural corridor, and those oak trees play a role in that.

Beyond that, these trees do a lot day to day that is easy to take for granted. They provide shade that keeps this area noticeably cooler, especially during the hotter months, and they help with air quality and how water moves through the hillside when it rains. They have been here a long time, and once they are gone, they are not something that can realistically be replaced in any meaningful way.

We also understand there are environmental review considerations for a project like this, and given the number of concerns, including tree removal, slope conditions, and fire risk, we hope a more thorough review is required before anything moves forward.

We understand development happens, but this particular lot feels especially sensitive given its size, slope, and the number of large, mature trees on it. From where we sit, it does not seem like a situation where changes can be made without wider impact.

We ask that all of this is carefully considered before moving forward.

Thank you for your time and consideration.

Sincerely,

Michelle & Erich Randolph

4224 Saltillo St.  
Woodland Hills CA 91364

Bellow are two separate Mountain Lion crossings. 1 is on our property where the Mountain Lion crosses our lot and onto 4230 N. Saltillo St. The 2nd one is 20ft from our address also on Saltillo St.

