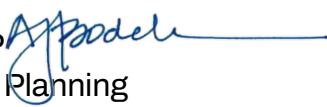


August 28, 2025

TO: Staff

FROM: Amy J. Bodek, AICP 
Director of Regional Planning

**SUBDIVISION AND ZONING ORDINANCE INTERPRETATION NO. 2025-08 –
DISASTER RECOVERY: REBUILD PROJECTS WITH NEW ROOFTOP DECKS IN THE
SANTA MONICA MOUNTAINS COASTAL ZONE (PALISADES FIRE)**

PURPOSE

This memorandum clarifies that rebuild projects with new rooftop decks on properties impacted by the Palisades Fire within the Santa Monica Mountains Coastal Zone are not “like-for-like” rebuild projects. These rebuild projects are subject to the development standards in the Santa Monica Mountains Local Coastal Program (“LCP”) and [Executive Order No. N-20-25](#), issued by the Governor on February 13, 2025, which applies to properties impacted by the Palisades Fire.

BACKGROUND

Executive Order No. N-20-25 suspends the requirement for a project that will repair, restore, demolish, or replace property damaged or destroyed by the Palisades Fire (i.e., a “like-for-like” rebuild project) to obtain a permit under the California Coastal Act if:

- The project scope is limited to primary and accessory structures proposed in substantially the same location as the structures that were damaged or destroyed; and
- The replacement structures do not exceed 110% of the footprint and height of the structures that were damaged or destroyed.

Similarly, the LCP’s Local Implementation Program (County Code Section 22.44.820.A.5) includes development standards for “like-for-like” rebuild projects, and also clarifies that any replacement structure “shall be for the same use as the destroyed structure.”

Additionally, Executive Order No. N-20-25 clarifies that the County is the sole agency that may determine which projects are eligible for the suspension of permitting requirements under the California Coastal Act and that the County can develop guidance for implementing this suspension.

INTERPRETATION

Pursuant to [County Code Chapter 22.234 – Interpretations](#), the following interpretation applies to rebuild projects on properties impacted by the Palisades Fire within the Santa Monica Mountains Coastal Zone:

A rebuild project will only be considered “like-for-like” and avoid permitting requirements under the California Coastal Act if it complies with all requirements in Executive Order No. N-20-25 (e.g., replacement structures must be in substantially the same location, must not exceed 110% of the footprint and height of the damaged or destroyed structures, etc.), and the LCP requirement that replacement structures must be for the same use as the damaged or destroyed structures.

Pursuant to this interpretation, a rebuild project with a new rooftop deck that did not exist before the Palisades Fire is not considered a “like-for-like” rebuild project because it is not the same use as the damaged or destroyed structure.

APPLICABILITY

This memorandum applies to any application for a rebuild project on properties impacted by the Palisades Fire in the Santa Monica Mountains Coastal Zone submitted on or after February 13, 2025, and will remain in effect until Executive Order No. N-20-25 expires, is rescinded, or is otherwise invalidated.

If you have any questions regarding this interpretation, please contact Mitch Glaser at mglaser@planning.lacounty.gov.

AJB:DJD:MG:NMM