

March 4, 2026

TO: Staff

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

**SUBDIVISION AND ZONING ORDINANCE INTERPRETATION NO. 2026-02 -  
DEVELOPMENT IN A COORDINATED EFFORT IN HILLSIDE MANAGEMENT AREAS**

**PURPOSE**

This memorandum clarifies the meaning of “development in a coordinated effort” for purposes of determining when a Conditional Use Permit (CUP) is required for multiple applications within a Hillside Management Area (HMA), as referenced in [County Code Section 22.104.030 \(Permit Required\)](#).

**BACKGROUND**

Development within an HMA requires a CUP to ensure that projects are designed to preserve and enhance the physical integrity and scenic value of an HMA. Exceptions to a CUP are listed in [County Code Section 22.104.030 \(Permit Required\)](#), and include:

*Development on a single lot, provided that grading in connection with the development does not exceed 15,000 cubic yards of total cut plus total fill material [...] The exception to the Conditional Use Permit requirement in this Subsection A shall not apply when two or more lots are **developed in a coordinated effort**, regardless of the ownership of the involved lots, and regardless of whether the developments are applied for concurrently or through multiple successive applications. (emphasis added)*

Additional clarification is needed on whether developments on two or more contiguous lots within an HMA are considered a “coordinated effort.”

**INTERPRETATION**

Concurrent applications on two or more contiguous lots in an HMA are not considered development in a coordinated effort based solely on ownership, the timing of the application filing, and/or the location/adjacency of the lots.

A “coordinated effort” shall include grading across lots or the use of cut/fill between lots, including the use of cut/fill between lots to balance grading. If development, as defined in [County Code Section 22.14.080 \(Definitions – H\)](#) on contiguous lots can be carried out independently, it is not a coordinated effort. For example, a proposal to develop two lots within an HMA with one residence on each lot would not be considered a coordinated effort if the applicant can independently grade the building pad and driveway access on each lot and connect each lot independently to infrastructure, such as water and sewer.

### **APPLICABILITY**

This memorandum applies to all pending applications under review as of the date of this memorandum and to all new applications submitted on or after the date of this memorandum. This memorandum will remain in effect until such time that Title 22 is amended to clarify these provisions.

If you have any questions regarding this memorandum, please contact Evan Sahagun at [esahagun@planning.lacounty.gov](mailto:esahagun@planning.lacounty.gov).

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