



# DEPARTMENT OF CITY PLANNING

## RECOMMENDATION REPORT

### City Planning Commission

**Date:** June 11, 2026  
**Time:** After 8:30 a.m.  
**Place:** City Hall  
John Ferraro Council Chamber, 3rd Floor,  
Room 340  
200 North Spring Street  
Los Angeles, CA 90012

*This meeting may be available virtually, in a hybrid format. The meeting's telephone number and access code number will be provided no later than 72 hours before the meeting on the meeting agenda published at <https://planning.lacity.org/about/commissionsboards-hearings> and/or by contacting [cpc@lacity.org](mailto:cpc@lacity.org)*

**Public Hearing:** April 14, 2026  
**Appeal Status:** Tentative Tract Map is not further appealable  
**Expiration Date:** June 12, 2026, for Commission case

**Case No.:** VTT-84453-1A  
**CEQA No.:** ENV-2025-5698-SE  
**Incidental Cases:** None  
**Related Cases:** CPC-2025-5697-DB-PR-SPPC-MCUP-VHCA  
**Council No.:** 4 - Raman  
**Plan Area:** Sherman Oaks – Studio City – Toluca Lake – Cahuenga Pass  
**Specific Plan:** Ventura/Cahuenga Boulevard Corridor Studio City  
**Certified NC:**  
**GPLU:** Neighborhood Office Commercial  
**Specific Plan GPLU Zone:** Neighborhood and General Commercial C1.5-1VL-RIO  
**Applicant:** Brett Torino & Eleda Cohen, Studio City Sports Center, LLC  
**Applicant Representative:** Rose Fistrovic, Psomas  
**Appellants:** 1-Barry Johnson, Studio City Residents Association  
2-Studio City for Safe Development Jamie T. Hall, representative  
3-Marianne King

**PROJECT LOCATION:** 12501 - 12665 West Ventura Boulevard

**PROPOSED PROJECT:** The proposed project includes the merger and re-subdivision into two ground lots, three residential airspace lots, five commercial airspace lots, and eight parking airspace lots for the construction of a mixed use development consisting of 814 residential dwelling units and approximately 75,968 square feet commercial uses on a 261,485 square-foot lot in the C1.5-1VL-RIO zone, as well as a Haul Route approval for the removal of approximately 521,000 cubic yards of dirt.

**REQUESTED ACTIONS:** Appeal of the entire Deputy Advisory Agency's April 15, 2026, Determination which approved:

1. An exemption from Californian Environmental Quality Act pursuant to California Public Resource Code Section 21080.66.

2. Pursuant to Los Angeles Municipal Code (LAMC) Section 17.06 and 17.15 and Section 13B.7.3 of the Chapter 1A of the LAMC, a two-phased Vesting Tentative Tract Map, VTT No. 84453, for merger and re-subdivision of the project site into two (2) main ground lots, three (3) residential airspace lots, five (5) commercial airspace lots, and eight (8) parking airspace lots and a haul route approval for the removal of approximately 521,100 cubic yards of dirt.

**RECOMMENDED ACTIONS:**

1. **Determine** that based on the whole of the administrative record, the Project is exempt from California Environmental Quality Act (CEQA) pursuant to Public Resources Code, Section 21080.66.
2. **Deny** the appeal and sustain the Deputy Advisory Agency's Determination of VTT-84453.

VINCENT P. BERTONI, AICP  
Director of Planning

*Phyllis Nathanson*

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Phyllis Nathanson, Principal City Planner

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## PROJECT ANALYSIS

### **Appellant Decision Body**

The regulations for appealed subdivision approvals are established in LAMC, Chapter 1, Article 7. Pursuant to LAMC, Chapter 1A, Section 14.3, the City Planning Commission (CPC) acts as the initial appellate body for projects that involve a lot area of 65,000 square feet or more, create at least 50 dwelling units, or result in a net increase of 50,000 gross square feet of non-residential floor area. As the subject project exceeds all three thresholds by providing over 50 units and 50,000 square feet of non-residential space on a lot larger than 65,000 square feet, it falls under CPC jurisdiction.

Additionally, while Multiple Approval appeals are typically heard by the Area Planning Commission, under LAMC, Chapter 1A, Section 13A.2.10, the City Planning Commission assumes jurisdiction over all appeals of Director of Planning decisions if any related case approvals require a CPC hearing.

### **Project Summary**

The proposed project includes the merger and re-subdivision of four (4) legal lots broken into a total of eight (8) portions into two ground lots, three residential airspace lots, five commercial airspace lots, and eight parking airspace lots for the construction of a mixed use development (Riverwalk at Studio City) consisting of 814 residential dwelling units and approximately 75,968 square feet commercial uses on a 261,485 square-foot lot in the C1.5-1VL-RIO zone, as well as a Haul Route approval for the removal of approximately 521,000 cubic yards of dirt.

### **Background**

The proposed project is located at 12501 - 12665 West Ventura Boulevard in the Sherman Oaks – Studio City – Toluca Lake Cahuenga Pass Community Plan area and the Ventura-Cahuenga Boulevard Corridor Specific Plan (Specific Plan). The site consists of four (4) legal lots consisting of eight (8) portions, Los Angeles County Assessor Parcel Number (APNs 2375-018-008, 2375-018-013, 2375-018-018, 2375-018-019), having a lot area of 261,485 square feet pre-dedication. The Advisory Agency approved the applicant's request for a Tentative Tract Map for the merger and re-subdivision into two ground lots, three residential airspace lots, five commercial airspace lots, and eight parking airspace lots and a Haul Route approval for the removal of approximately 521,000 cubic yards of dirt.

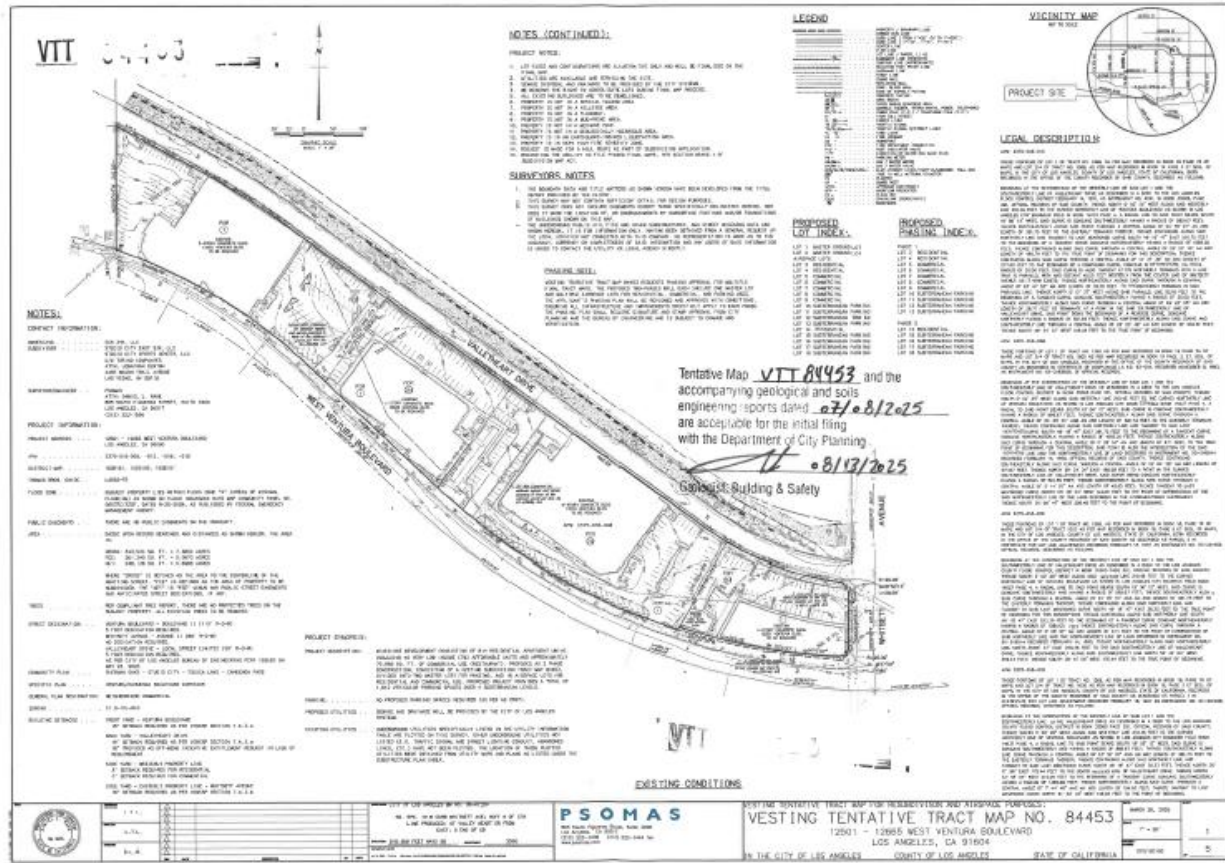


Figure 1. Tentative Tract Map

Below is an aerial photograph with the site shown.

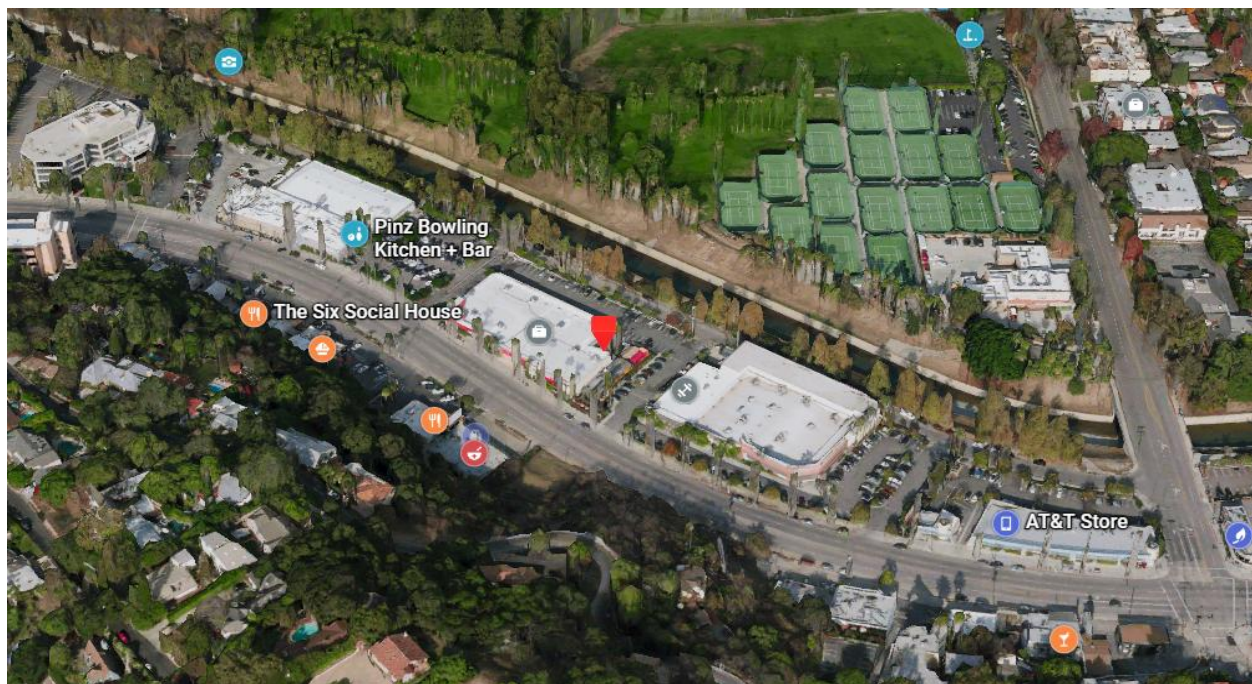


Figure 2. Aerial photography from Bing.com

The Community Plan designates the site for Neighborhood Office Commercial land uses with corresponding zones of C1, C1.5, C2, C4, RAS3, RAS4, and P. The site is zoned C1.5-1VL-RIO (Commercial, Height District 1VL). The C1.5 zone permits a wide array of land uses including commercial and multifamily residential uses. The "1VL" Height District 1VL designation allows a maximum height of 45 feet and three (3) stories, and a maximum floor area ratio ("FAR") of 1.5:1. However, per Section 3.A.2, wherever the Specific Plan contains provisions which require different setbacks, restricted yards, lower densities, lower heights, restricted uses, greater parking requirements or other greater restrictions or limitations on development than would be allowed pursuant to the provisions contained in LAMC Chapters 1 and 1A, the Specific Plan shall prevail and supersede the applicable provisions of the Code. The site is located in the Specific Plan in Neighborhood and General Commercial land use designation which limits the site to an FAR of 1.0:1 and allows buildings, abutting a major or secondary highway, may only exceed 30 feet in height, if, for each 10-foot increment above 25 feet, at least a 10-foot setback from the roof perimeter is provided.

The subdivision case, VTT-84453, was filed on October 10, 2025. On April 15, 2026, the Deputy Advisory Agency issued a Letter of Determination approving the Tentative Tract Map subject to conditions of approval. The CPC-2025-5697-DB-PR-SPPC-MCUP-VHCA, which is a related case, is scheduled for June 11, 2026, City Planning Commission hearing.

### **Scope of Appeal**

On April 28 and 30, 2026, the following appeals of the Deputy Advisory Agency's Determination were filed:

1. **Appellant 1:** Barry Johnson, Studio City Residents Association
2. **Appellant 2:** Studio City for Safe Development, represented by Jamie T. Hall of Channel Law Group, LLP
3. **Appellant 3:** Marianne King

The appeals challenge the entire decision of the Deputy Advisory Agency as well as the project's environmental clearance.

### **Appeal Points & Staff Response**

#### **Appellant 1 Appeal Points:**

1. *Appellant claims that the statutory CEQA exemption under PRC § 21080.66 is unavailable because the project site is located in a Very High Fire Hazard Severity Zone (VHFHSZ), and the decision letter contains no finding of mitigation. Adding 814 households to a VHFHSZ presents an extreme fire safety and evacuation risk, and emergency responder access to a 7-story structure on congested streets is inadequate.*

#### **Response:**

The appellant's argument relies on a misinterpretation of the statutory threshold for environmental review. Under Assembly Bill (AB) 130, housing development projects situated within a VHFHSZ remain eligible for the infill housing statutory exemption from CEQA under California Public Resources Code (PRC) Section 21080.66. This eligibility is maintained provided the project implements mitigation measures consistent with rigorous state standards, such as Government Code Section 51182 or California Building Code (CBC) Chapter 7A.

Expert evidence in the record, specifically the Dudek<sup>1</sup> Fire Protection Technical Memo, dated September 26, 2025, confirms that the project "will be in compliance with the applicable provisions of Chapter 7A... and Section 51182," thereby legally qualifying for the exemption.

Accordingly, the project was correctly identified as statutorily exempt under PRC Section 21080.66. Unlike categorical exemptions, statutory exemptions are enacted by the legislature and are generally absolute, meaning they are not subject to "cumulative impact" exceptions that the appellant attempt to trigger. The Dudek Technical Memo further substantiates this by demonstrating that the project adheres to rigorous Los Angeles City Fire Code standards for water supply, fire apparatus access, and defensible space. Key technical details supporting this finding include:

- Aerial fire apparatus access is provided via Ventura Blvd, exceeding the 28-foot minimum width requirement and satisfying all necessary setbacks as required by the Los Angeles Fire Code.
- The Los Angeles Department of Water and Power (LADWP) has verified through an Information of Fire Flow Availability report that the existing infrastructure, utilizing six project-adjacent hydrants flowing simultaneously, can provide the maximum fire flow requirement of 9,000 gallons per minute (gpm).
- The project satisfies defensible space requirements by providing 200 feet of managed vegetative fuel, divided into specific zones (Ember-resistant, Zone A, and Zone B) to minimize structure vulnerability to wildfire.

Furthermore, the lead agency has fulfilled all procedural requirements of AB 130, including the mandatory tribal consultation process. The City notified culturally affiliated tribes, such as the Gabrieleo Band of Mission Indians Kizh Nation, and successfully closed consultation on April 13, 2026, after agreeing to incorporate their specific mitigation measures as binding conditions of approval. By strictly adhering to these infrastructure, fire safety, and procedural standards, the project successfully meets all statutory requirements for exemption eligibility.

2. *Appellant claims the 200-day haul route authorizing 28,800 truck trips will cause traffic gridlock at already failing intersections, and no traffic impact analysis (TIA) or Level of Service (LOS) study was conducted.*

Response:

The project qualifies for a Statutory Exemption from CEQA pursuant to Public Resources Code (PRC) Section 21080.66, as established under Assembly Bill 130. Consequently, the appellant's demand for a TIA and LOS study is not required pursuant to CEQA, because a statutory exemption does not require project specific traffic-related analyses. While the appellant expresses concerns regarding cumulative traffic and quality-of-life impacts, statutory exemptions—unlike categorical exemptions—are legislative mandates that do not include exceptions for cumulative impacts.

To maintain public safety and ensure organized traffic flow, the Advisory Agency exercised its independent authority under the Subdivision Map Act (SMA) to impose rigorous operational conditions on the haul route. These comprehensive measures which are grounded in site-specific infrastructure capabilities, include limiting haul route activity to 144 daily truck trips, restricting operational hours to between 9:00 a.m. and 3:00 p.m., and requiring the continuous

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<sup>1</sup> Dudek was commissioned by Genton Cockrum Partners to provide a due diligence technical assessment of the Riverwalk at Studio City project (Project).

presence of flag persons to manage circulation. The use of the PRC Section 21080.66 exemption is further validated by a fire protection technical analysis confirming the project adopts all state-mandated fire hazard mitigation standards required for infill housing in a Very High Fire Hazard Severity Zone. To further the administrative records, the staff recommends adding the following condition of approval:

*Prior to the recordation of the Final Map, the Applicant shall demonstrate compliance with Public Resources Code Section 4290 and its implementing regulations in Title 14, Division 1.5, Chapter 7, Subdivision 2 (State Minimum Fire Safe Regulations) and Chapter 7 of the California Building Code.*

- 3. Appellant claims the proposed 84-foot, 7-story height exceeds the maximum allowed under State Density Bonus Law, and the Advisory Agency improperly deferred density and zoning compliance to Los Angeles Department of Building and Safety (LADBS).*

Response:

The Vesting Tentative Tract Map (VTT-84453) serves primarily to facilitate the merger and re-subdivision of the project site into ground and airspace lots. It does not, however, independently authorize deviations from established density or height standards. The Advisory Agency has lawfully conditioned the map's ultimate effectuation upon the successful approval and implementation of the related case CPC case (CPC-2025-5697-DB-PR-SPPC-MCUP-VHCA). This companion case is the designated legal vehicle for adjudicating Density Bonus requests, Specific Plan compliance, and other building-specific entitlements.

Per the Letter of Determination (LOD) and associated Staff Report, the physical building envelope, height, and unit density are strictly governed by the companion CPC case. While the subdivision map is consistent with the unit density permitted by the underlying C1.5-1VL-RIO zone, any density bonus or height waivers are subject to the adjudication of the CPC case. Condition 18.g of the LOD explicitly mandates that prior to the recordation of the final map, the applicant must submit an approved copy of the CPC case and demonstrate full compliance with all its associated conditions. If the companion CPC case is not approved or is significantly altered, a formal modification to the tract map will be required.

Furthermore, the Subdivision Map Act limits the scope of "design and improvement" to the configuration of lots and the infrastructure serving them, such as street alignments and utilities, rather than the vertical construction or building scale. Consequently, the Advisory Agency's findings focus on required public right-of-way improvements, such as the dedication of land to widen Valleyheart Drive and the installation of new street lighting and sidewalks as recommended by the Bureau of Engineering and Bureau of Street Lighting. These mandated infrastructure upgrades are independent of the building's physical attributes, which remain under the jurisdiction of the companion CPC case.

- 4. Appellant claims the project will cause severe cumulative quality-of-life impacts (noise, air quality, parking displacement) due to concurrent demolition and construction with the nearby Residences at Sportsmen's Lodge.*

Response:

Pursuant to legislative mandate, projects that satisfy the PRC 21080.66 criteria are granted a statutory exemption from CEQA. Unlike categorical exemptions, which are subject to exceptions such as those for "cumulative impacts" under CEQA Guidelines Section 15300.2,

statutory exemptions are enacted by the State Legislature and are generally absolute. Therefore, assertions concerning cumulative construction effects, such as noise, air quality, or traffic from concurrent nearby developments, do not undermine the project's exempt status. Furthermore, the Advisory Agency has formally determined that the subdivision's design is unlikely to result in significant public health or environmental issues under the Subdivision Map Act, provided there is adherence to standard City regulations and specific conditions of approval. These findings are grounded in site-specific infrastructure capabilities and are independent of the project's statutory CEQA clearance.

5. *Appellant claims the excavation of 521,000 cubic yards in a liquefaction zone requires substantive CEQA analysis. Deferring the geotechnical analysis to an unpublished LADBS report violates CEQA and the Map Act's substantive finding requirements.*

Response:

While CEQA review is precluded by the Statutory Exemption established by AB 130, the project's physical suitability and safety are confirmed by the LADBS Grading Division's Soils Report Approval Letter (Log #136328). Structural integrity is ensured through mandated engineering measures, including the use of a mat foundation deriving support from competent native soils to mitigate earthquake-induced settlements. The LADBS approval specifically requires that the structure and its subterranean walls be designed to withstand uplift and hydrostatic pressures based on historic high groundwater levels, with all retaining walls provided with standard surface back drain and subdrain systems.

Rigid environmental and safety protocols are also established by the approval. Any necessary dewatering must obtain formal clearance from the Department of Public Works and the California Regional Water Quality Control Board (LARWQB) before permits are issued. Regarding site stability, the LADBS Grading Division has prohibited on-site storm water infiltration systems due to the site's location in a liquefaction zone. Consequently, the project must implement alternative Low Impact Development (LID) strategies, such as biofiltration or capture and use, to satisfy RIO and stormwater regulations.

Finally, the approval mandates strict controls for excavation and lateral support to protect adjacent properties and public ways. Pursuant to the soil report approval letter, LOG # 136328, shoring is required for any temporary excavations that remove lateral support, defined as excavations extending below a 45-degree plane from the bottom of an existing footing or property line. These systems must be engineered for a maximum lateral deflection of ½ inch if nearby structures are within a 1:1 plane. A comprehensive shoring monitoring program must be maintained throughout this process to the satisfaction of the soils engineer. Furthermore, the owner must provide a 30-day written notice of intent to neighbors before excavating deeper than adjoining foundations.

6. *Appellant claims the Subdivision Map Act requires independent environmental review separate from the CEQA exemption. The AB 130 CEQA exemption does not excuse the City from making independent environmental and public health findings under the Subdivision Map Act.*

Response:

The Advisory Agency made detailed and specific findings in accordance with the Subdivision Map Act (Gov. Code § 66474) that exist independently of any CEQA exemption. As documented in the determination letter, the subdivision's design and proposed improvements

were evaluated to ensure they would not result in significant environmental damage or cause serious public health problems.

The Advisory Agency affirmative findings regarding public health and safety were predicated on comprehensive evaluations conducted by technical departments. The Bureau of Engineering (BOE) analyzed the site's infrastructure and confirmed reliable connectivity to the existing public sewer system. To improve pedestrian safety and accessibility, the BOE further mandated extensive ADA-compliant sidewalk improvements along major thoroughfares, including Ventura Boulevard, Whitsett Avenue, and Valleyheart Drive. Additionally, the Bureau of Street Lighting (BSL) dictated specific safety enhancements, including the installation of 10 new streetlights on Valleyheart Drive and 13 upgrades to existing lighting on Ventura Boulevard and Whitsett Avenue to meet modern public safety standards.

A critical component of the Advisory Agency's rationale was the intentional distinction maintained between the CEQA process and the requirements of the Subdivision Map Act. The Advisory Agency's determination offers findings under Gov. Code § 66474(e) and (f), which determine that the site is physically suitable for the proposed density and type of development. These conclusions were based on the site's existing urbanized character and confirmed links to regional infrastructure, such as the Hyperion Treatment Plant, and were arrived at through an analysis entirely separate from the CEQA exemption.

Appellant 2 Appeal Points:

7. *Appellant claims inconsistency with the General Plan Safety Element due to wildfire evacuation constraints in a VHFHSZ.*

Response:

The determination letter provides explicit acknowledgement of the VHFHSZ status, with Finding (a) verifying that the proposed map maintains long-term consistency with the objectives and policies of both the Community Plan and the Citywide General Plan. The City of Los Angeles General Plan Safety Element provides a contextual framework for understanding the relationship between hazard mitigation, disaster response, and recovery. It explicitly incorporates the City's Local Hazard Mitigation Plan (LHMP), which establishes a framework for risk-based decision-making to reduce damage from future disasters—including wildfires—and guides the implementation of stringent building and fire codes.

Mandatory compliance with all pertinent Fire Department regulations is an absolute requirement for the project, ensuring that development within this sensitive zone adheres to the highest safety protocols. By conforming to these protocols, the project directly implements the hazard mitigation and emergency preparedness objectives outlined in both the Safety Element and the Local Hazard Mitigation Plan. As the primary jurisdictional expert in fire life safety, the Los Angeles Fire Department (LAFD) conducted an exhaustive review of the specific Vesting Tentative Tract Map (VTT-84453) and formally confirmed that the site plan and emergency access parameters incorporate sufficient safety components to protect future residents and the surrounding community.

Rather than rejecting the map or identifying insurmountable safety flaws, LAFD recommended its approval, contingent upon the developer meeting rigorous urban fire safety standards. These critical requirements include formal plot plan approval to verify hydrant placement and turnout dimensions, the mandatory installation of Knox Boxes to facilitate rapid emergency entry, and strict adherence to aerial access parameters for any buildings exceeding 30 feet in

height to ensure ladder truck functionality during a fire event. As the project satisfies these stringent LAFD conditions, it is fully consistent with the General Plan Safety Element's mandate to protect residents from unreasonable risks associated with natural disasters.

8. *Appellant claims the project will injure wildlife (Western Yellow Bat) and that "no habitat" findings lack evidence.*

Response:

According to Subdivision Map Act Finding (e), the project site is presently occupied by surface parking and commercial structures. There was no evidence of established habitat, fish, or wildlife found on the property. Consequently, it has been determined that the design of the subdivision and proposed improvements will not cause substantial environmental damage or injury to wildlife or their habitat. Additionally, while there are no Protected Trees on site, the project is mandated to provide tree replacement at a 1:1 ratio for the non-protected trees and trees within the public right-of-way proposed for removal.

9. *Appellant claims the project violates State Minimum Fire Safe Regulations (14 CCR § 1276.01) by providing 1.5-foot setbacks instead of the mandated 30-foot setbacks, creating a serious public health hazard. Appellant claims the introduction of substantial new population to a VHFHSZ without compliance with the State Minimum Fire Safe Regulations exacerbates wildfire hazards and constitutes a serious public health problem. Appellant claims the AB 130 CEQA statutory exemption (PRC § 21080.66) is invalid because the project allegedly fails to comply with State Minimum Fire Safe Regulations.*

Response:

The administrative record includes a Fire Protection Technical Memo prepared by Dudek that offers a due diligence assessment for the project. The Dudek memo, dated September 26, 2025, explicitly states the project complies with PRC § 4290 and § 4291. While 14 CCR § 1276.01(a) requires a 30-foot setback, subsection (b)(5) allows reductions if the project incorporates the most protective requirements of CBC Chapter 7A. The appellant's claim selectively reads State Fire Safe Regulations. While 14 CCR § 1276.01 requires setbacks, it expressly permits reductions when a project utilizes alternative methods, such as complying with California Building Code Chapter 7A. The project's Fire Protection Technical Memo states that the project would comply, mitigating structure-to-structure ignition risks. Ultimately, during the plan check process, the project will be reviewed for compliance from LAFD and LADBS.

10. *Appellant claims the project introduces a public health problem because there is no corridor-level evacuation capacity analysis for Ventura Boulevard, which already serves as a primary wildfire evacuation route.*

Response:

The appellant's assertions concerning evacuation capacity are based on anecdotal lay opinions and lack the substantial evidence required under CEQA Guidelines. Neither the Subdivision Map Act nor the applicable CEQA Statutory Exemption requires a corridor-level mass evacuation simulation for an infill project. The project was reviewed by numerous City agencies, including LADOT and LAFD, both of which imposed specific conditions for access, fire lanes, and reservoir space to ensure life safety and emergency apparatus access.

To facilitate safe movement and prevent queuing in the public right-of-way, LADOT mandated a 30-foot-wide two-way driveway and a 20-foot queuing reservoir space within the project site. Furthermore, LAFD established independent requirements, including 28-foot widths for aerial apparatus access and a maximum travel distance of 150 feet from property line to ensure that firefighters can extend pre-connected hose lines completely around buildings. According to the Dudek Fire Protection Technical Memo, dated September 26, 2025, Ventura Boulevard measures 70 feet in width, which significantly exceeds the LAFD's 28-foot minimum requirement for aerial fire apparatus access roads. The project's urban infill setting and approved 70-foot-wide aerial access route provides compliant fire protection features, with buildings set back approximately 21 feet from Ventura Blvd, safely falling within the required 15- to 30- foot range for aerial ladder articulation. Additionally, other local access roads, such as Whitsett Avenue and Valleyheart Drive, meet the required widths for emergency apparatus, with widths of 64 feet and 28 feet respectively. Because neither expert agency identified systemic evacuation failures or unmitigated specific adverse impacts on public health and safety, the Advisory Agency's determination incorporates these rigorous LAFD and LADOT conditions, including 20- to 28-foot fire lanes and proximity mandates for hydrants, to guarantee secure ingress and egress.

11. *Appellant claims the City failed to consider cumulative impacts of ongoing nearby projects on evacuation and health.*

Response:

The project was granted a Statutory Exemption under PRC § 21080.66. Unlike Categorical Exemptions, which are regulatory in nature and established by the Secretary of the Resources Agency, Statutory Exemptions are enacted directly by the legislature and are generally absolute in their application. Because they are created by statute, they are not subject to the "cumulative impact" or other exceptions found in the CEQA Guidelines that typically limit the use of categorical exemptions. This specific exemption under PRC § 21080.66 provides a streamlined pathway for certain projects by removing the requirement for further environmental review under CEQA.

Appellant 3 Appeal Points:

12. *Appellant opposes the 10-foot-wide concrete sidewalk on Valleyheart Drive, requesting a combination sidewalk and grass parkway to increase permeability and ecological balance next to the LA River.*

Response:

LAMC, Chapter 1, Section 17.05 D requires that subdivisions conform to adopted Street Design Standards. BOE explicitly required the 5-foot dedication and the construction of a 10-foot-wide concrete sidewalk with tree wells along Valleyheart Drive to complete a Limited Local Street standard border. This requirement is incorporated as LOD Condition S-3(i)(3). The inclusion of tree wells provides necessary permeability. The mandated 10-foot-wide concrete sidewalk with tree wells strictly adheres to the Bureau of Engineering's street improvement standards and ADA requirements for a Limited Local Street. These mandated tree wells ensure permeability while maintaining safe and compliant pedestrian access within the public right-of-way.

13. *Appellant asserts that installing 10 street lights on Valleyheart Drive is excessive and will cause adverse light pollution impacts on nocturnal wildlife in the LA River open space.*

Response:

The requirement for street lighting along Valleyheart Drive is a public improvement mandated by the Bureau of Street Lighting (BSL) to ensure public safety and adequate roadway illumination for both vehicular and pedestrian traffic. In accordance with LAMC, Chapter 1, Section 17.05, which requires adequate public improvements for all subdivisions, the BSL initially determined that ten (10) new street lights, as specified in LOD Condition S-3(c)(1), are necessary along Valleyheart Drive.

The BSL has noted that this initial quantity is a preliminary determination; the final number and precise placement of these fixtures may be modified during the formal plan check phase. These adjustments will be based on technical illumination calculations and equipment selection to meet current minimum national standards for safety. Furthermore, the project includes additional lighting improvements, such as the relocation and upgrade of one (1) street light on Whitsett Avenue and twelve (12) street lights on Ventura Boulevard if street widening occurs pursuant to Bureau of Engineering conditions.

While the appellant claims that 10 street lights are excessive and will impact nocturnal wildlife, they have not submitted substantive evidence demonstrating that these requirements violate any LAMC standards. Further, as noted on Page 3 of the LOD, the site is subject to the River Implementation Overlay (LA RIO). Pursuant to LAMC Sec. 13.17, the project must obtain RIO Administrative Clearance, which strictly requires exterior lighting to be shielded, down-cast, and designed to prevent glare and light spillover into the adjacent Los Angeles River habitat (LAMC Section 13.17-F,3). Thus, the project lawfully balances mandatory public safety illumination with objective ecological protections

14. *Appellant objects to the 1.5-foot rear yard setback along Valleyheart Drive, citing concerns over the project's excessive massing. Furthermore, the Appellant argues that the area regained from the cancelled Ventura Boulevard dedication should instead be redirected toward Valleyheart Drive.*

Response:

To comply with LOD Condition CC-1, the project must replace trees at a 1:1 ratio using minimum 24-inch box trees. The project proposal involves the removal of non-protected trees to accommodate new development, which necessitates a robust replacement strategy to maintain the local canopy. However, because the site is located within a VHFHSZ, landscaping must strictly adhere to LAFD fuel modification standards as outlined in LAMC, Chapter 5, Article 7. According to the Dudek Fire Protection Technical Memo, fire safety takes precedence in this zone; properties must prioritize fire-resistant plant selection and restrict any species that could create a fuel ladder hazard, such as those that facilitate the vertical and horizontal continuity of fire, regardless of standard native species quotas.

The landscape plan is required to balance the environmental mandates of LOD Condition CC-1 with mandatory fire safety regulations. This includes maintaining defensible space, such as a 5-foot ember-resistant "Zone 0" around structures and a "lean" Zone A extending 30 feet, where plant density is restricted and species are limited to small herbaceous or succulent varieties. While artificial turf may be utilized as a fire lane surface to ensure necessary aerial

apparatus access, it remains subject to explicit LAFD approval. Ultimately, the selection of flora must prioritize moisture-retaining, low-resin species that do not produce excessive dead litter, ensuring that the project upholds public safety while fulfilling its 203-tree replacement requirement to comply with the RIO approved plant palette.

15. *Appellant opposes the 1.5-foot rear yard setback on Valleyheart Drive, claiming the project is too massive and that space from a dropped Ventura Boulevard dedication should be shifted to Valleyheart Drive.*

Response:

The Vesting Tentative Tract (VTT-84453) is solely a subdivision action under the Subdivision Map Act, used to create ground lots and airspace lots. Setbacks, building massing, and site design are land-use and zoning regulations. The LOD explicitly states that front and side yard requirements must comply with the Specific Plan, the LAMC, and the companion case (CPC-2025-5697-DB-PR-SPPC-MCUP-VHCA), and are verified by the Department of Building and Safety.

Setbacks for the Riverwalk at Studio City project are governed by the Ventura-Cahuenga Boulevard Corridor Specific Plan and the associated Density Bonus entitlements. The project site is considered a through lot. Pursuant to LAMC, Chapter 1, Section 12.21.C.1.h, "at each end of a through lot there shall be a front yard of the depth required for the zone in which each street frontage is located, ..." Since Ventura Boulevard is considered the front, the project is required to have a rear yard setback of 15 feet. As part of the Density Bonus application, which reserves 7% (46 units) of the base density for Very Low Income tenants, the applicant is requesting a Waiver of Development Standard to allow for a 1.5-foot rear yard setback. This is in lieu of the 19-foot setback otherwise required by Specific Plan and LAMC Section 12.13.C.3, as the project's seven-story height normally necessitates additional yard depth. The 1.5-foot setback is measured from the lot line adjacent to Valleyheart Drive. The requested waiver allows the developer to expand the building envelope so additional units can be constructed, and the overall space (dedicated to residential uses) is increased. This waiver supports the Applicant's decision to provide affordable units for Very Low Income Households for 55 years.

Furthermore, the project design has been revised to incorporate more extensive landscaping and the planting of additional trees along the Ventura Boulevard frontage. These enhancements are specifically situated within the area previously designated for dedication and are intended to foster a dynamic, pedestrian-friendly streetscape that improves the native habitat. The proposed development fully complies with the RIO Ordinance, ensuring a positive interface with the adjacent Los Angeles River through multimodal connections and native species support. These modifications, alongside requested waivers for height and lot coverage, are essential to achieving the project's total density of 814 residential units.

16. *Appellant claims the 84-foot, 7-story building will cast shadows that adversely impact the LA River habitat area.*

Response:

The appellant's shade and shadow concerns target the physical building envelope and height, which are entirely outside the scope of this Vesting Tentative Tract Map action and are instead governed by the companion CPC entitlement. Furthermore, the environmental grievance is statutorily invalid; as an infill mixed-use project located within a Transit Priority Area (TPA),

shade and shadow impacts are expressly precluded from being considered significant environmental impacts pursuant to Public Resources Code § 21099(d)(1). Opinions regarding shading do not override these explicit state law exemptions.

### **Conclusion**

Based on the analysis provided, staff has determined that the project satisfies all Subdivision standards and complies with all applicable CEQA requirements. The project, known as Riverwalk at Studio City, proposes to repurpose 6.01 acres (261,870 square feet) for a mixed-use development featuring 814 residential units and 75,968 square feet of commercial space. As the residential floor area constitutes approximately 89.6% of the total 726,822 square feet, the project qualifies as a housing development project eligible for statutory relief.

Staff recommends that the City Planning Commission (CPC) deny the appeal regarding the Deputy Advisory Agency's Determination issued on April 28, 2026, and April 30, 2026. Furthermore, acting upon independent judgment, after reviewing the entire administrative record, it is recommended that the CPC find that the project was appropriately assessed under Statutory Exemption No. ENV-2025-5698-SE on April 15, 2026. This determination is supported by the project's adherence to the Assembly Bill (AB) 130, effective June 30, 2025, CEQA Statutory Infill Exemption standards, including its location within an incorporated municipality and its previous development with urban land uses. Based on the complete record, the project remains exempt from CEQA in accordance with Public Resources Code Section 21080.66.


# INITIAL SUBMISSIONS

The following submissions by the public are in compliance with the Commission Rules and Operating Procedures (ROPs), Rule 4.5a. Please note that “compliance” means that the submission complies with deadline, delivery method (hard copy and/or electronic) AND the number of copies. The Commission’s ROPs can be accessed at <http://planning.lacity.org>, by selecting “Commissions & Hearings” and selecting the specific Commission.

The following submissions are not integrated or addressed in the Staff Report but have been distributed to the Commission.

Material which does not comply with the submission rules is not distributed to the Commission.

## ENABLE BOOKMARKS ONLINE:

\*\*If you are using Explorer, you will need to enable the Acrobat  toolbar to see the bookmarks on the left side of the screen.

If you are using Chrome, the bookmarks are on the upper right-side of the screen. If you do not want to use the bookmarks, simply scroll through the file.

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

May 29, 2026

**VIA E-MAIL**

Los Angeles City Planning Commission  
Los Angeles City Hall  
200 N. Spring Street, Room 340  
Los Angeles, CA 90012  
Attn: Cecilia Lamas, Commission Executive Assistant II  
[cpc@lacity.org](mailto:cpc@lacity.org)

Re: 12555 W. Ventura Boulevard  
Response to Appeal of VTT-84453 and ENV-2025-5697-SE  
Related Case: CPC-2025-5697-DB-PR-S-PPC-MCUP-VHCA  
CPC Hearing Date: Thursday, June 11, 2026

Dear President Lawshe and Members of the City Planning Commission:

Our firm represents Studio City Sports Center, LLC, (the “*Applicant*”) the owner of the property located at 12555 W. Ventura Boulevard (the “*Property*”), and the applicant for the Riverwalk Project. We respectfully request that the City Planning Commission deny the appeals of the Deputy Advisory Agency’s Letter of Determination (“*LOD*”) approving Vesting Tentative Tract Map (“*VTTM*”) 84453 and approving the statutory CEQA Exemption for urban infill housing development projects, as set forth in Public Resources Code (“*PRC*”) section 21080.66. There were three (3) appeals filed by (i) Studio City for Safe Development/ Alex Staikos (“*SCSD Appeal*”), (ii) Studio City Residents Association/ Barry Johnson (“*SCRA Appeal*”), and (iii) Marianne King (“*King Appeal*”) (collectively, the “*Appeals*”). The key issues in the Appeals are addressed below. None of the claims in the Appeals are valid or provide substantial evidence necessary to overturn the City’s approval of VTTM 84453 or the statutory CEQA Exemption under PRC §21080.66, or provide a preponderance of evidence that there is a specific adverse impact to public health and safety that cannot be mitigated to support denial of the Project under the Housing Accountability Act (“*HAA*”, Gov’n Code § 65589.5)).

**I. VTTM Approval**

VTTM 84453 is a merger and re-subdivision of four legal parcels divided into eight portions with two master ground lots, three residential airspace lots, five commercial airspace lots, and eight parking airspace lots for the construction of a mixed use development consisting of 814 residential dwelling units, including 46 affordable units, and approximately 75,968 square feet commercial uses on a 261,485 square-foot lot in the C1.5-1VL-RIO Zone, as well as a haul route approval for

the removal of approximately 521,000 cubic yards of dirt, and the removal of 240 non-protected trees from the project site and three (3) non-protected trees from public right-of-way.

The VTTM entitlements also include a Statutory CEQA Exemption for urban infill housing development projects under PRC §21080.66, known as AB130. The City Staff Report, dated April 14, 2026, and the Advisory Agency’s LOD, dated April 15, 2026, determined that based on the whole of the record, the Project, including the VTTM, is statutorily exempt from CEQA under AB130.

There is also a related case requesting entitlements for a Density Bonus, including off-menu incentives and waivers, Project Review for developments creating 50 or more dwelling units, and Project Compliance Review with the Ventura-Cahuenga Boulevard and Corridor Specific Plan (the “*Specific Plan*”), for the construction of a mixed-use project consisting of 814 residential dwelling units, including 46 affordable units, and approximately 75,968 square feet commercial uses and a Class 2 Main Conditional Use Permit to allow the sale and dispensing of a full-line of alcohol for on- and off-site consumption in conjunction with the restaurants (the “*Density Bonus Project*”). The Deputy Advisory Agency did not act on these entitlements, which the City Planning Commission is considering on June 11, 2026. The VTTM and the Density Bonus Project are entitlements for the same Project, and are considered as a whole in the environmental review.

## **II. The Project Qualifies for a Statutory CEQA Exemption under AB130**

### **A. The City Reviewed and Approved AB130 Compliance for the VTTM**

On June 30, 2025, the California State Legislature passed AB130, which provided a statutory CEQA exemption for urban infill housing development projects that meet certain requirements, including residential/mixed-use types, property size (under 20 acres), urban area and use, zoning and general plan consistency (including density bonus waivers and concessions), and project location. (PRC §21080.66) As set forth in the AB130 CEQA Checklist, attached as Exhibit A, the Project fully complies with the AB130 requirements.

The Project is a mixed-use housing development project with over 89% residential floor area (PRC §21080.66.(a)). The Property is 6.01 acres (PRC §21080.66.(a) (1)); located within the City of Los Angeles ((a)(2)); previously developed with retail, restaurants and entertainment uses ((a)(3)); and is consistent with the C1.5-1VL-RIO zone, Neighborhood Office Commercial land use designation, and the Specific Plan provisions based on approval of the Density Bonus concessions and waivers (Gov. Code §65915) ((a)(4)). The Project has a density of one dwelling unit per 321.7 square feet of lot area, which complies with the minimum Metro density in Gov. Code §65583.2(c)(3)(B) (Housing Element) of 30 dwelling units per acre (1 dwelling unit per 1,492 square feet of lot area) ((a)(5)). The Property is not designated as a historic structure ((a)(7)); and does not include a hotel use ((a)(8)). The Property is not located within any of the designated areas listed in Gov. Code §65913.4 (a)(6), because it is not in a coastal zone, farmland, wetland, hazardous waste site, earthquake fault zone, special flood area, regulatory floodway, conservation area, protected habitat, lands under conservation easement, and there were no prior residential uses on the Property (PRC §21080.66.(a) (6), (7)). The Project is within a Very High Fire Hazard

Severity Zone (“*VHFHSZ*”), but complies with the State Fire Code laws that otherwise allow the Project in the zone (PRC §21080.66.(a)(6), Gov. Code §65913.4 (a)(6)).

The City accepted the application for review on October 10, 2025, completed the tribal consultations in January 29, 2026, and later deemed the application for the housing development project application complete on May 16, 2026. The City must approve or disapprove the project within thirty days from the conclusion of the tribal consultation projects, after the application has been deemed complete (PRC §21080.66 (b))(Gov. Code §65950(a)), and must determine that the Project is inconsistent with an applicable plan, program, policy, ordinance, standard, requirement or other similar provision within 60 days after the application has been deemed complete for projects with 150 units or more. (Gov. Code §65589.5(j)(2)(A)) The Deputy Advisory Agency held the hearing on the VTTM on April 14, 2026, and issued the Letter of Determination approving the VTTM and the AB130 CEQA Exemption on April 15, 2026. The Notice of Exemption was posted and recorded on April 20, 2026.

**B. The State Legislature Provides A CEQA Exemption For Any Approvals Related to Qualifying Housing Development Projects**

The California legislature clearly intended the AB130 statutory CEQA Exemption for housing development projects to include review of a VTTM approved as part of the project. PRC §21080.66 states: "Without limiting any other statutory or categorical exemption, this division does not apply to any aspect of a housing development project, as defined in subdivision (b) of §65905.5 of the Government Code, including any permits, approvals, or public improvements required for the housing development project, as may be required by this division, if the housing development project meets all of the following conditions." The Legislature's use of the phrase "any aspect... including any permits, approvals, or public improvements" is deliberately expansive. A VTTM is unambiguously a "permit" or "approval" required in connection with the housing development project. If PRC §21080.66 was interpreted to statutorily exempt the housing development project from CEQA, but leave the VTTM subject to parallel environmental review, it would undermine this express legislative intent. The City complied with this State directive by identifying PRC §21080.66 as the environmental clearance for the VTTM for this housing development project, and the City has consistently taken the same position with other housing development projects with associated VTTMs.

**C. There are No Exceptions to Statutory CEQA Exemptions, including AB130**

For statutory CEQA Exemptions, including AB130, there are no exceptions to the exemption that are otherwise provided for categorical exemptions (CEQA Guidelines §15260 *et seq.*). Therefore, the categorical exceptions for location, cumulative impact, significant effect due to unusual circumstances, scenic highways, unusual circumstances, hazardous waste sites, and historic resources do not apply to specific statutory CEQA exemption (CEQA Guidelines §15300.2(a-f)). If a project meets all of the requirements to qualify for the AB130 CEQA Exemption set forth in PRC §21080.66, then it is deemed statutorily not to have any CEQA impacts, and it is irrelevant if there are any potential environmental impacts, including those

identified in the above exceptions. The Project has been determined to qualify for the AB130 CEQA exemption, and therefore no additional environmental review or analysis is required.

The SCSD Appeal, Section V, claims that the cumulative impact of the Project in combination with other ongoing and reasonably foreseeable projects in the immediate vicinity demonstrates potential environmental impact to public health. The nearby projects include the Sportsmen’s Lodge redevelopment (12805-12835 Ventura), the Harvard-Westlake athletic center (4047-4155 N. Whittsett Avenue), the Sunset Place Project (12544-12583 Ventura Boulevard), the 12434 Moorpark housing project (ED1,12434 Moorpark Street), the 12750 Moorpark housing project (ED1, 12750 Moorpark Street). The first two projects were approved in the past few years, and the remaining have pending applications. All of these projects were evaluated as individual separate projects; the first three are discretionary projects with CEQA review, and the last two are ministerial projects under Executive Directive 1. However, because the Project qualifies for a statutory CEQA Exemption under AB130, the Project is legally deemed not to have impacts under CEQA, and there is no requirement to evaluate cumulative impacts, and no exception for cumulative impacts of nearby projects under CEQA Guidelines §15300.2(b).

**D. The Project Fully Complies with Fire Safety Codes and Regulations**

The Property is located in a Very High Fire Hazard Severity Zone; however, pursuant to PRC §21080.66(a)(6), the Project is still exempt from CEQA if it complies with the fire safety provisions set forth in PRC §4291, PRC §51182, PRC §4290, and California Building Code (“*CBC*”) §7A. As set forth in the Technical Memorandum for Riverwalk at Studio City by Dudek, dated September 26, 2025 (the “*Dudek Fire Code Analysis*”), the Project fully complies with the State laws (including PRC §4291 and §51182, PRC §4290, and CBC §7A), City ordinances, and building and fire code requirements. These findings are summarized in detail in Exhibit A. The Dudek Fire Code Analysis is attached as Exhibit B. The Technical Review – Wildfire Management Features, dated May 29, 2026, by SGH, confirms that the Project will fully comply with the State laws, and other Fire and Building Code requirements, which are reviewed as part of the building permit plan check process (“*SGH Wildfire Management Review*”). In addition, the SGH Wildfire Management Review provides a full analysis of the site specific exposure assessment (Section 5.2), fire-resistant construction (Section 6.1), emergency access and fire hydrant locations (Section 6.2), defensible space (6.3), and fire protection features (Section 6.4). The SGH Wildfire Management Review is attached as Exhibit C. The Dudek Fire Code Analysis and SGH Wildfire Management Review constitute substantial evidence in the record that the Project complies with State and local fire codes.

**AB130.** The SCRA Appeal (Ground 1) claims that the AB130 CEQA Exemption is unavailable, because the Property is located in a VHFHSZ, which is a prohibited location under Gov. Code §65913.4(a)(6)(D); therefore, a Mitigated Negative Declaration is required. The SCRA Appeal quotes from various law firm websites that describe the AB130 exclusions; however, the SCRA Appeal misstates the law. The CEQA Exemption in PRC §21080.66 specifically permits a housing development project in a VHFHSZ if it meets the State law requirements set forth in PRC §4291 and §51182 for defensible space, PRC §4290 for fire safety standards, and CBC §7A, which has been replaced by the wildland-urban interface (“*WUI*”) building standards, currently contained in the California Wildland-Urban Interface Code (“*CWUIC*”) 2025, Part 7 (effective January 1,

2026). These are analyzed in detail in the Dudek Fire Code Analysis, which was part of the Project application and reviewed by City planning staff in preparation of the City Staff Report. In addition, the SGH Wildfire Management Review identifies the wildfire mitigation measures required by State and local codes that are incorporated in the Project's entitlement documents, and must be cleared as part of the building permit plan check review.

**Wildfire Evacuation.** The SCRA Appeal (Ground V.B) claims that the Fire Department analysis in the LOD, section 11, fails to provide an evacuation study for the residents including adjacent road capacity analysis during peak hours. In addition, the SCSD Appeal (IV.D) similarly claims that the LOD provides no corridor-level evacuation capacity analysis that includes the other projects on Ventura Boulevard and the existing homes in the hillside area to the south. The SCSD Appeal (II) also identifies that Gov. Code §65302.15 requires each City's General Plan, Safety Element, to be updated to identify evacuation routes and their capacity, safety, and viability and evacuation locations under a range of scenarios.

The City Council adopted a comprehensive update to the General Plan in October 2021, and revised the Safety Element in 2025 to incorporate the requirements of Gov. Code §65302.15. The Safety Element states, "To better accommodate the variety of evacuation scenarios, the City has developed a dynamic approach to evacuation response, one that can respond to different conditions. As specified in the City EOP Evacuations Annex "primary evaluation routes consist of the major interstates, highways, and primary arterials within the City and Los Angeles County." However, in response to a more localized emergency, like a hillside wildfire, the LAFD works in coordination with the Los Angeles Department of Transportation and Los Angeles Police Department to identify the most appropriate local egress option and direct individuals to those routes. Potential routes have been pre-selected based on a number of considerations, but potential evacuation routes will vary based on the type and location of hazard/disaster."

The Fire Department is not required by code to provide a site-specific evacuation procedure as part of a project-specific VTTM review. The Fire Department fully complies with the required analysis by identifying the conditions necessary to meet the standards set forth in the CBC, CWUIC, LABC, and City Fire Code. In addition, the City has an Emergency Operations Plan for Evacuation, dated October 2020, that analyzes the emergency response as a whole for multiple City departments, including using major streets as evacuation routes identified by DOT. This response is modified on a dynamic basis during an emergency, and therefore, the scenario for evacuation changes based on the specific location and details of the earthquake or wildfire.

**State Minimum Fire Safety Regulations.** The SCSD Appeal (IV.B) claims that the Project does not comply with State Minimum Fire Safe Regulations for projects in a VHFHSZ, as codified in CCR §1270 *et. seq.* The Appeal cites to CCR §1276.01, which requires a minimum 30-foot setback for all buildings from all property lines (for interior property lines) and/or the center of the Road (for road adjacent property line), with certain exceptions in §1276.01(b). The Road is defined as "A public or private vehicular pathway to more than four (4) Residential Units, or to any industrial or commercial Occupancy." (CCP §1270.01) The intent of the regulation is that all buildings are separated by 30 feet, including those on neighboring properties, or the buildings have specific design features that would make them non-combustible in compliant with code. CCP §1276.01 states: "A reduction in the minimum setback shall be based upon practical reasons, which

may include but are not limited to, parcel dimensions or size, topographic limitations, Development density requirements or other Development patterns that promote low-carbon emission outcomes; sensitive habitat; or other site constraints, and shall provide for an alternative method to reduce Structure-to-Structure ignition by incorporating features . . .”

The Property is surrounded on three sides by public streets. The buildings in the Project are set back more than 30 feet from the centerline of Whittset Road to the east and Ventura Boulevard to the south, and therefore comply with the requirement, and are set back more than 40 feet on Valleyheart Drive from the LA River. The building on the adjacent property to the west at 12711 Ventura Boulevard is set back more than 30 feet from its property line with a surface parking lot. The westernmost residential building in the Project is setback from the west property line by a 28-foot wide fire lane (which is also a Road per the definition). CCR §1276.01(b) provides an alternative to the 30 foot setback if there is an alternative method to obtain structure-to-structure ignition, which include features such as block walls, non-combustible material extending five feet from the building, hardscape landscaping, reduced window exposure within the 30 foot setback, or the most protective requirements of CBC, Chapter 7A, which is replaced by the 2025 CWUIC, Part 7 (effective 1 January 2026). The residential and commercial buildings on the Project are designed to comply with most updated CBC, Chapter 7A and 2025 CWUIC Part 7 provisions, and therefore provide an alternative compliance under §1276.01(b), including the building adjacent to the 28-foot wide fire lane. This analysis is set forth in detail in the attached SGH Wildfire Management Review.

**Fire Code Compliance.** The Project proposes to develop 6.01 acres on the northwest corner of Ventura Blvd. and Whittsett Avenue with a mixed-use development consisting of residential apartment units and commercial space that includes two-story restaurants and seven-story residential buildings built over subterranean parking. The construction types for the Project are Type 3 for the residential units over Type 1 for the garage levels. The Project is located in a California Department of Forestry and Fire Protection (CAL FIRE) designated Local Responsibility Area (LRA) VHFHSZ.

The 2025 edition of the California Building Standards Code (Title 24) became effective on January 1, 2026. Construction documents for this Project will be submitted for LADBS plan check after the effective date of the 2025 code cycle. The governing WUI building standards are contained in CWUIC 2025 Part 7, as adopted and amended by the City of Los Angeles through LAMC Article 7.1 (LAWUIC). The City’s adoption is documented in the Los Angeles Board of Fire Commissioners report (November 2025) and implemented through LADBS supplemental plan check correction list PC.STR.Corr.Lst.116 (Rev. 2025-12-23). The SGH Wildfire Management Review, Appendix B, provides a summary of the code provisions from the legacy CBC Chapter 7A (2022) to CWUIC 2025 Part 7.

Key CWUIC requirements for structures in a VHFHSZ address Class A roof assemblies, ignition-resistant exterior walls, protected eaves and soffits, ember-resistant ventilation openings, tempered glazing, ignition-resistant decking, enclosed underfloor areas, roof-to-wall fire stopping, and trellis and appendage restrictions. Detailed VHFHSZ compliance notes and product specifications will be developed at the CD phase and verified through the LADBS plan check process.

**Fire Department Report.** The Fire Department conditions set forth in the LOD fully analyze and require compliance with the LA Fire Code and State law. As determined by DWP, the Project has the infrastructure to comply with water supply and fire flow requirements and substantially complies with fire apparatus access requirements. The Project provides the 200 feet of defensible space required in a VHFHSZ, and the space includes the Los Angeles River and existing adjacent urban development and adjacent streets. The Project includes both ground- level and rooftop landscaping, which is required to be approved by LAFD Fuel Modification Plan Checkers who evaluate each project independently based on site, hazard, and vegetation characteristics. The Fire Code Analysis evaluates the proposed landscaping and concludes that it complies with the code requirements. The entirety of the trees and shrubs proposed for the Project will be reviewed and approved by the LAFD. These findings are analyzed in detail in the LOD and in the Dudeck Fire Report, and further reviewed in the SGH Wildfire Management Review.

**California PRC Section 4290 and Title 14 Fire Safe Regulations.** California PRC § 4290 establishes minimum fire safety standards for development in State Responsibility Area (“*SRA*”) lands, with implementing regulations in Title 14, California Code of Regulations (“*CCR*”), Division 1.5, Chapter 7, Subchapter 2 (State Minimum Fire Safe Regulations). The implementing regulations address four principal categories: emergency access (Title 14 CCR §1273); signage and building numbering (Title 14 CCR §1274); water supply and fire hydrants (Title 14 CCR §1275); and fuel modification, greenbelts, and building/parcel siting setbacks (Title 14 CCR §1276 series, including §1276.01 “Building and Parcel Siting and Setbacks”). Because the Property is located in a City of Los Angeles LRA VHFHSZ, California PRC S§4290 and the State Minimum Fire Safe Regulations are relevant to the Project’s fire safety framework, subject to local regulations that equal or exceed the state minimums. The technical content of those provisions is also addressed because CGC § 65913.4(a)(6)(D) references California PRC §4290 as one of the named categories of fire mitigation measures.

**California PRC Section 4291 and CGC Section 51182 — Defensible Space.** Following AB 3074 (2020) and SB 504 (2024), defensible space is organized into three zones: Zone 0 (0 to 5 ft, Ember-Resistant/Immediate Zone), Zone 1 (5 to 30 ft, Lean/Clean/Green Zone), and Zone 2 (30 to 100 ft, Reduced Fuel Zone). Zone 0 prescriptive requirements remain the subject of ongoing rulemaking by the Board of Forestry and Fire Protection (BOF) under Executive Order N-18-25; the Project commits to compliance with the prescriptive Zone 0 standard in effect at the building permit phase.

**LAFD, LAMC, and Los Angeles-Specific VHFHSZ Requirements.** The Los Angeles Building Code (LABC §§91.7203 and 91.7207) and the City's adoption of the California Wildland-Urban Interface Code 2025, Part 7 (codified in LAMC Chapter V, Article 7.1, LAWUIC) impose construction requirements for projects in the VHFHSZ, including Class A roofing, enclosed underfloor areas, ignition-resistant exterior walls, vent restrictions, tempered glazing, and ignition-resistant decking. The Los Angeles Fire Code (LAFC §57.4911) establishes the VHFHSZ zone and imposes use restrictions within that zone (including open-flame prohibition and restricted entry). Brush clearance obligations apply under LAMC §§ 57.4906.5.2 and 57.1.603.5 et seq. (200

ft maintenance zone). These requirements will be verified through the LADBS plan check process at the building permit phase.

***Fire Code Analysis for Urban Infill Context.*** The Project site presents a distinctly different wildfire mitigation context than a hillside or wildland-adjacent development. It is a 5.99 acre urban commercial parcel on the valley floor, surrounded by existing commercial development (including LAFD Fire Station 78 immediately east across Whitsett Avenue), paved streets, and the concrete-channelized Los Angeles River. The dominant exposure pathway at this site is structure-to-structure fire spread and ember transport from vegetated hillside areas south of Ventura Boulevard rather than direct wildland fire-front contact. The Project replaces aging commercial buildings and surface parking with modern, code-compliant construction, which materially reduces the local structure-to-structure ignition risk relative to existing site conditions.

As set forth in the SGH Wildfire Management Review, Section 6 analysis, the Project fully complies with the required State and Local fire code requirement. Key technical findings include WUI building features, required fire access and water supply and compliant defensible space. In summary, the Class A flat-roof/parapet, concrete podium underfloor enclosure, and predominantly noncombustible exterior cladding are consistent with California Wildland-Urban Interface Code 2025, Part 7, §504. The Composite-panel cladding products specified at construction document phase will satisfy ASTM E136, CCR Title 19 §12-7A-1, or Office of the State Fire Marshal Building Materials Listing Category 8140. The Project complies with the required Fire access and water supply. There are four driveways that access onto two public streets, Valleyheart drive and Ventura Boulevard, with the minimum 20 ft fire lanes; Los Angeles Department of Water and Power *Information of Fire Flow Availability Report* (Appendix C, Exhibit C-3) supports the Los Angeles Fire Department-required 9,000 gpm fire flow (six public hydrants on Ventura Boulevard, 138–140 psi static, 116–118 psi residual at 1,500 gpm); and aerial fire apparatus can access for the 84 ft Buildings 2, 3, and 4 which will be detailed at the construction document phase per 2026 Los Angeles Fire Code, Appendix D, Section D105. The Project also provides sufficient defensible space. The Project is located in a hardscape-dominant Zone 0, low-fuel-load Zone 1 (36,800 sq ft / 14% landscape with evapotranspiration-controlled irrigation), and noncombustible Zone 2 (paved streets, existing commercial development, concrete-channelized Los Angeles River) consistent with Gov. Code § 51182.

Because the Project complies with PRC §4291 and §51182, PRC §4290, and CBC §7A/WCUIC, the Project falls within the exception for properties in the VHFHSZ. Therefore, the Project qualifies for the AB130 CEQA Exemption. AB130, PRC §21080.66, is a Statutory CEQA exemption; therefore, exceptions to the exemption under CCR §15300.2, do not apply. If the Project complies with the AB130 checklist, it is deemed exempt from CEQA.

### **III. The Project Complies with Zoning, General Plan, and Specific Plan Standards, as May Be Modified by Density Bonus Incentives and Waivers**

The LOD, Findings of Fact (Subdivision Map Act) (pages 16-21), makes the required findings for approval of the VTTM as set forth in Gov. Code §§66473.1, 66474.60, .61 and .63, and as required by LAMC Article 7, and specifically LAMC 17.06.B for Vesting Tentative Tract Maps. The related entitlements for a Density Bonus, Project Review, Project Compliance with the

Specific Plan and a Class 2 Main CUP for alcohol are evaluated in a separate hearing by the City Planning Commission (CPC-2025-5697-DB-PR-S-PPC-MCUP-VHCA). The LOD approving the VTTM specifically identifies the separate related Density Bonus entitlements, and confirms that the LOD is not approving the additional density, incentives or waivers in the Density Bonus application.

The SCRA Appeal (Ground 4) claims that the LOD approving the VTTM cannot defer the approval of the density to LADBS review. In fact, the City planning department has a legally vetted parallel procedure for simultaneously reviewing the VTTM by the Advisory Agency and reviewing the Density Bonus incentives and waivers, and other entitlements by the Planning Commission. (LAMC §17.06.B, LAMC §12.22.A.25) The Planning Commission Hearing Officer holds a joint hearing with the Advisory Agency, and then, the Planning Commission reviews the Hearing Officer report and holds a public hearing on the Density Bonus and other entitlements. The Proposed Map and the Design or Improvement of the VTTM was found to be consistent with the General Plan and Specific Plan. As stated in the LOD, “Design refers to the configuration and layout of the proposed lots in addition to the proposed site plan layout. Pursuant to §66427(a) of the Subdivision Map Act, the location of the buildings is not considered a part of the approval or disapproval of the map by the Advisory Agency.” (LOD, page 18) Therefore, the LOD did not approve the density, which will be considered in the Density Bonus Project review by the Planning Commission. This is not a deferral of the review, but rather an acknowledgement of the parallel review process. LADBS will not provide clearance as part of building permit review until both the VTTM and Density Bonus Project are approved and conditioned through the City planning review process.

The SCRA Appeal (Ground 3) claims that the Advisory agency does not cite any authority for approving additional height. In addition, the SCRA Appeal states that the height would alter the character of the low-rise buildings on Ventura Boulevard. As stated above, the Density Bonus Project is under review by the City Planning Commission, and was not reviewed by the Advisory Agency. The location or design of the buildings were not considered as part of the approval, and the height was not approved as part of the LOD for the VTTM. The height waiver under the Density Bonus entitlement will be evaluated by the Planning Commission. Gov.Code §65915(e) permits waivers of development standards in Density Bonus projects, such as height, that physically preclude the construction of a housing development at the permitted density or with approved incentives. Therefore, if a Project provides a certain amount of affordable housing units to qualify for a specific density, then the City must provide waivers of development standards that would otherwise physically preclude construction at that density.

The SCRA Appeal (Ground 6) similarly claims that the Specific Plan and River Improvement Overlay District (“**RIO**”) review were impermissibly deferred. In fact, the LOD found that the VTTM, including the configuration and layout of the proposed lots in addition to the proposed site plan layout, were consistent with the Specific Plan, and made the required findings (LOD, p.17-18) The LOD identified a standard RIO Administrative Clearance procedure that exists as part of the LADBS building permit clearance process.

The SCRA Appeal (Ground 5) claims that the LOD fails to clarify the affordability levels and calculation for the affordable units in the Project. However, the LOD for the VTTM did not

approve any level of affordability or review the Density Bonus Project, which will be evaluated by the Planning Commission. For the Density Bonus review, the Project has 654 base units, and provides 7% of the base units, which is 46 units, as affordable to very low income households. With the Density Bonus, the Project has a total of 814 units. This level of affordability was confirmed by the Los Angeles Housing Department through review of the Affordable Housing Referral Form.

The related case requests entitlements for the Density Bonus Project, including off-menu incentives and waivers, Project Review for developments creating 50 or more dwelling units, and Project Compliance Review with the Specific Plan, for the construction of a mixed-use project consisting of 814 residential dwelling units, including 46 affordable units, and approximately 75,968 square feet commercial uses and a Class 2 Main Conditional Use Permit to allow the sale and dispensing of a full-line of alcohol for on- and off-site consumption in conjunction with the restaurants. The Deputy Advisory Agency did not act on these entitlements, which the City Planning Commission is considering on June 11, 2026. The VTTM and the Density Bonus Project are entitlements for the same Project, and are considered as a whole in the environmental review.

#### **IV. The City Made the Required Findings for a VTTM Approval**

The SCSD Appeal claims that, even if the housing development project is exempt from CEQA pursuant to PRC §21080.66, the VTTM requires separate environmental and public health findings under the Subdivision Map Act. The SCRA Appeal cites Gov. Code §§66474(e) and (f), which require certain “negative” findings - including disapproval of a project upon a finding that the design of the subdivision or the proposed improvements are likely to cause substantial environmental damage, substantially and avoidably injure fish or wildlife or their habitat, or are likely to cause serious public health problems. The SCSD Appeal also cites *Topanga Ass’n for a Scenic Cmty. v. County of L.A.* (1989) 214 Cal.App.3d 1348 in support. The SCSD Appeals then tries to argue that full CEQA environmental review is required to make these “negative” substantial harm findings, even though the Project is statutorily exempt from CEQA. Similarly, the SCRA Appeal (Ground 7) claims that the Findings of Fact are conclusory, and provide no analysis of issues such as liquefaction hazard, fire-evacuation capacity, and suitability for density. These claims have no merit.

Pursuant to the Subdivision Map Act, Gov. Code §66427, the design and location of buildings are not part of the map review process for apartment buildings. As stated in the LOD, “Design refers to the configuration and layout of the proposed lots in addition to the proposed site plan layout. Pursuant to §66427(a) of the Subdivision Map Act, the location of the buildings is not considered a part of the approval or disapproval of the map by the Advisory Agency.” (LOD, page 18) Therefore, the Advisory Agency considered the configuration of the lots and the layout on the site plan, but was not required to evaluate the project density, which is subject to the related Density Bonus Project review by the Planning Commission.

***No Substantial Environmental Damage or Substantial Injury to Wildlife or Habitat.***  
First, the LOD affirmatively made the findings that the design of the subdivision or the proposed improvements are not likely to cause substantial environmental damage, or substantially and avoidably injure fish or wildlife or their habitat, and are not likely to cause serious public health

problems. (LOD, page 20) The LOD identified that the project site is currently developed with commercial buildings and surface parking, and there are no identified fish, wildlife or established habitat located on site. The Applicant provided substantial evidence that there was no habitat for protected species through its tree reports and biological analysis required for City Department reports.

***No Serious Public Health Problems.*** In addition, the LOD confirmed that the Project was not likely to cause serious health problems. The LOD found that the development will be connected to the City’s sanitary sewer system, which will be directed to the LA Hyperion Treatment Plant that complies with Statewide ocean discharge standards. BOE also reported that the VTTM will not violate the California Water Code, because it will connect to the public sewer system and have only a minor incremental impact on the quality of the effluent from the Hyperion Treatment Plant. (LOD, page 20)

The LOD did not just make cursory conclusions. The LOD provides full analysis of the required findings as set forth in the Findings of Fact (Subdivision Map Act), and the City Departments’ review, analysis and conditions – all of which are included in the LOD. In the Findings of Fact, the LOD cites to the BOE report to show that the project connects to safe sewer and water systems, and that the project site is a fully developed commercial property with retail stores and parking lot, and that no protected habitat exists on site. These findings are fully analyzed in the LOD, pages 16-21, and supported by the conditions of the various departments, including the Bureau of Engineering (“**BOE**”), Department of Building and Safety, Grading and Zoning (“**DBS**”), Department of Transportation (“**DOT**”), Fire Department, Department of Water and Power (“**DWP**”), Bureau of Street Lighting, Bureau of Sanitation, Information Technology, Department of Recreation and Parks, the Urban Forestry Division, and the Department of City Planning – Site Specific Conditions, set forth on LOD, pages 2-8. The Deputy Advisory Agency relied on the thorough review and analysis of each of the separate Departments, in their reports, to provide substantial evidence to support the LOD findings. Therefore, the LOD makes the required findings that the subdivision and improvements are not likely to cause substantial and serious harm. SCRA provides no evidence that the subdivision or proposed improvements are likely to cause substantial environmental damage, likely to substantially and avoidably injure fish or wildlife or their habitat, or are likely to cause serious public health problems. This claim is just conjecture without any basis in fact.

***No Substantial Impact to Palm Tree Habitat.*** The SCSD Appeal claims that the removal of approximately 93 palm trees, including 22 onsite Mexican fan palms (*Washingtonia robusta*), 8 king palms (*Archontophoenix cunninghamiana*), 19 queen palms (*Syagrus romanzoffiana*), and 44 pygmy date palms (*Phoenix roebelenii*), which provide habitat for the western yellow bat, will substantially injure wildlife or its habitat. As evidence, the SCRA Appeal attached a western bat study from 2022 provided in opposition to the Harvard-Westlake Project, which is a recreational facility located on a former golf course across the river from the Project site. The report states that the western yellow bat (*Lasiurus xanthinus*) is a California Species of Special Concern that appears to roost exclusively in the skirts of palm trees located near open water or wetlands. However, as acknowledged in the report, the Harvard-Westlake EIR did not evaluate whether any bats actually existed on site, and the report noted that the loss of one active bat roost from the Project site would not have a substantial adverse effect on the western yellow bat population. In addition, the

Harvard-Westlake site was a former golf course with significant trees and landscaping and minimal traffic, which is a suitable area for nesting birds. It is significantly different from the Project site, and so the study does not provide substantial evidence for the conditions on the Project site.

The Project site is a fully developed commercial retail center with big box stores and a large surface parking lot with lighting that often had significant vehicular and pedestrian traffic. There has been no evidence of any western yellow bat on the Property. The palm trees are being removed in part because the LAFD strongly recommends removing palm trees in a VHFHSZ due to the high flammability of certain genus and species of palms. (<https://lafd.org/palms-and-wildfires-and-ab3074>) In addition, the proposed Project will provide significant tree replacement, in compliance with Urban Forestry regulations, with residential buildings and underground parking that will make a more suitable environment for bird habitat in the future.

***No Cumulative Impact to Habitat.*** The SCSD Appeal also claims, without any evidence, that the birds that were formerly nesting and foraging in the mature trees on the Harvard-Westlake golf course have now moved into the palms and other trees on the Project site's parking lot. The Appeal claims that it would cause these nesting and foraging birds to move again creating cumulative impacts. The Deputy Advisory Agency was only required to make findings related to the Subdivision Map Act, including whether the configuration and layout of the proposed lots or proposed site plan layout substantially and avoidably injured wildlife or their habitat. Here, the trees on the Property will be replaced in compliance with Urban Forestry standards and subject to review and conditions by Urban Forestry, and so there will be no permanent loss of habitat caused by the site plan layout. As stated, the Project is not required to review cumulative impacts as it is statutorily exempt from CEQA under PRC §21080.66.

***No Substantial Impact to Wildlife or Habitat by 10 LED Streetlights.*** The SCSD Appeal claims that the ten (10) new LED streetlights on Valleyheart Drive will introduce substantial new artificial light into the LA River Open Space corridor, which provides nocturnal foraging and movement habitat for bats, birds and other species. Similarly, The King Appeal opposes the installation of ten (10) new streetlights on Valleyheart Drive based on concerns to nocturnal wildlife. In fact, the current Project site is a large parking lot and commercial center with significant night lighting on the parking lot and on the entry to the big box stores for safety reasons. The new LED streetlights will be shielded and the light will be focused on the street and sidewalk to support safety and security of pedestrians and vehicles at night. There is no evidence that the new LED streetlights will provide more light than the existing large commercial center. In addition, there is no evidence that the additional light will cause any harm to birds living adjacent to a major commercial corridor.

Streetlights are necessary for safety of vehicles and pedestrians, especially on streets with limited traffic, such as along the LA River. In fact, according to a randomized control trial conducted by the University of Chicago "increased levels of lighting led to a 36% reduction in "index crimes"— a subset of serious felony crimes that includes murder, robbery and aggravated assault, as well as certain property crimes — that took place outdoors at night in developments that received new lighting, with an overall 4% percent reduction in index crimes." Various studies have concluded that good quality street lighting reduces the accident rate by increasing overall visibility. Driving at night is also more dangerous. Only a quarter of all travel by car drivers is

between the hours of 7pm and 8am, yet this period accounts for 40% of fatal and serious injuries. ([https://lalights.lacity.org/residents/stlighting\\_and\\_benefits\\_of\\_stlights.html](https://lalights.lacity.org/residents/stlighting_and_benefits_of_stlights.html)) Therefore, the Bureau of Street Lighting determines the number of streetlights necessary for a new development to support pedestrian and vehicle safety at night.

The SCSD Appeal and King Appeal provide no evidence of any potential impact to wildlife based on new LED streetlighting, and the claim is only conjecture without any support. The Project entitlements are statutorily exempt from CEQA under AB130, and therefore a lighting study was not required.

***No Public Harm Caused By Code-Compliant Buildings within the VHFHSZ.*** The SCSD Appeal claims that developing any Project in a VHFHSZ creates a public harm, and claims that the Project does not comply with the State Minimum Fire Safe Regulations. These claims are unfounded. The Project fully complies with the LA Fire Code and the setbacks in the State Minimum Fire Safe Regulations as described in detail above. The VHFHSZ has higher fire safety standards, but if a Project complies with the regulations, there is no separate finding of public harm.

## **V. Additional Issues**

### **A. Parkway on Valleyheart Drive**

The King Appeal requests numerous design changes that were not required by code or law. The King Appeal requests a parkway along Valleyheart Drive in lieu of the proposed 10-foot sidewalk on the south side of Valleyheart Drive within the City right of way (BOE Letter, Condition No. S-3(i)(3)) The City sidewalk width was conditioned by BOE and complies with City's street standards approved as part of the Mobility Plan 2035. The Applicant is not requesting to alter these BOE standards. Therefore, the King Appeal requested a deviation from current code and policy that is not required by law.

### **B. Landscape Plan and Building Shade**

The King Appeal claims that the Landscape Plan does not replace sufficient trees on site, and does not include sufficient native trees in compliance with the LA River Master Plan. This misstates the Project application, and the Project fully complies with the code requirements, including the LA River Master Plan. The Urban Forestry Department provides standards for replacement trees, approves the tree replacement type, location and size, and provides clearance during the building permitting phase. The King Appeal also claims that the shade from the building could impact habitat along the LA River. The King Appeal does not identify any habitat for protected species that exists immediately north of the Project along the LA River. In addition, the Project contains three U-shaped residential buildings that allow for sun on the north side of the building during various times of the day. Therefore, there is no evidence that the building shade will harm the existing trees along the LA River.

**C. The Advisory Agency Fully Complied with Due Process Required by the LAMC, City Policy and AB130**

The SCRA Appeal makes numerous claims related to the expedited processing and review based on the State-mandated time frames required for AB130, PRC §21080.66. AB130 has intentional expedited review to reduce the time and cost of evaluating housing development projects to encourage the construction of new housing to meet each city and county’s Regional Housing Needs Assessment allocations. Specifically, PRC §21080.66 requires that each application be reviewed and an incomplete letter be issued within 30 days after submission; the city must distribute notices for tribal consultation, allow time for consideration and review, and complete consultation within 148 days after the application is deemed complete; and, the city must make a final decision on the project within 30 days after the completion of the tribal consultation or the application is deemed approved (PRC §21080.66). Based on this timeline, discretionary review of housing development project entitlements that would previously take 18 to 24 months can now be completed in 7 to 9 months.

The Applicant filed the Project application on October 10, 2025; the City completed tribal consultation on January 29, 2026; and the City deemed the application complete on March 16, 2026. The City was required to hold a hearing and make a final determination on the Project within 30 days by April 15, 2026. The Deputy Advisory Agency and Hearing Officer held a joint hearing on April 14, 2026, and the Deputy Advisory Agency issued the LOD on April 15, 2026. The Applicant also presented the Project to the Studio City Neighborhood Council (“SCNC”) for preliminary review in January 2026. The SCNC Land Use Committee held hearings on the Project on April 30, 2026 and May 13, 2026, and the SCNC Board held a hearing on May 27, 2026. The SCNC has scheduled subsequent hearings on June 4, 2026 and June 8, 2026. The Planning Commission hearing on the Density Bonus Project entitlements and the LOD appeal is scheduled for June 11, 2026.

The SCRA Appeal (Ground 8) claims that there are procedural irregularities because the Deputy Advisory Agency issued its LOD one day after the hearing, and there was not time for the community to consider the testimony at the hearing. Although prior Advisory Agency determinations were often not issued for weeks, this delay actually cost significant time and money to the housing applicants. The one-day turn around was mandated by the timeframes set forth in PRC § 21080.66 to expedite and streamline housing development project review. The SCRA Appeal also questions why the environmental review was identified as EAF and changed to SE. The Applicant filed for a statutory CEQA exemption under AB130, but City planning required the EAF designation while it determined that the Project qualified for AB130. There is no irregularity in the processing – this is the City planning department’s standard procedure for AB130 review.

The SCRA Appeal provides a comparison of the Sportsmen’s Lodge project and review process and the Riverwalk project review and process. The Sportsmen’s Lodge project included a 530-unit mixed use project with a hotel and commercial uses, which were evaluated with a SCEA. The SCRA Appeal notes that the Riverwalk Project is an 814-unit mixed use project that is exempt from CEQA, and states that this is “a step in the wrong direction”. However, the SCRA Appeal does not identify any code violations with processing the Riverwalk project, and merely states its disapproval of a State mandated CEQA Exemption that provides streamlined review. The

SCRA Appeal notes that it brought a petition for writ of mandate against the Sportsmen’s Lodge in court, and states that the petition for writ of mandate against the Riverwalk project is “not yet filed.” AB130 was signed into law by the Governor on June 30, 2025, and so was not available to the Sportsmen’s Lodge project. However, many housing development projects will be CEQA exempt under AB130 and require streamlined processing in the future.

The SCRA Appeal also identifies a “Right-Sized Alternative,” which includes a four-story 400-unit project with 8,000 square foot commercial space and two levels of subterranean parking evaluated with a full EIR. This proposed alternative would violate the State Density Bonus Law and Housing Accountability Act by requiring a reduction in density despite the Project providing the required affordability levels for a density bonus and related incentives and waivers under State law.

#### **D. Housing Crisis Act**

The SCRA Appeal (Ground 2) claims that the SB330 vesting under the State Housing Crisis Act is not allowed for Projects in a VHFHSZ. The Project is vested through the approval of the Vested Tentative Tract Map. The City requires SB330 review for any project that is located on the City Housing Element sites inventory, and the Applicant appropriately filled out the SB330 application and checked that the Property was within the VHFHSZ.

#### **E. Excavation and Haul Route**

The SCRA Appeal, section V.C and D, claims a potential construction impact caused by the haul route and the excavation of soil in a liquefaction area without any evidence. The soil excavation was fully evaluated in the Geology and Soils Report Approval, dated August 11, 2025, by the LADBS Grading Division. The haul route was reviewed and approved by the Deputy Advisory agency with numerous conditions set forth in LOD, page 10-11, including street limitations, time and duration limits, total daily trip limits, cleaning and watering conditions, and safety and flagmen requirements. These are standard conditions included with the approval of any haul routes, and the approval limits the roads utilized to Ventura Boulevard, Coldwater Canyon Avenue, US101, US405, US 5, Roxford Street, Sepulveda boulevard, San Fernando Road and Sunshine Canyon Road. There is no significant impact identified for the standard approved haul route, and the haul route, as an approval related to the Project, is exempt from CEQA under PRC PRC §21080.66.

### **VI. The City Must Comply with the Housing Accountability Act**

The State Housing Accountability Act (“*HAA*”, Gov'n Code § 65589.5) requires that cities approve housing development projects unless the city can make findings that the project causes a specific adverse impact to public health and safety. When a proposed housing development project complies with applicable, objective general plan, zoning, and subdivision standards and criteria, in effect at the time that the application was deemed complete, a City can only disapprove a project or impose a condition that the project be developed at a lower density, if based on the *preponderance* of evidence in the record: (i) The housing development project would have a

specific, adverse impact upon the public health or safety unless the project is disapproved or approved upon the condition that the project be developed at a lower density; and (ii) There is no feasible method to satisfactorily mitigate or avoid the adverse impact, other than the disapproval of the housing development project or the approval of the project upon the condition that it be developed at a lower density. (Gov'n Code §65589.5 (j)(1)).

“A specific, adverse impact means a significant, quantifiable, direct and unavoidable impact, based on objective, identified written public health or safety standards, policies, or conditions as they existed on the date the application was deemed complete.” (Gov'n Code §65589.5(d)(2)) Therefore, the City can only deny the off-menu incentives and waivers for a Density Bonus Project if it finds a specific adverse impact to public health and safety. A preponderance of the evidence is a higher bar than substantial evidence, and it means that the burden of proof is on the appellant to show the greater weight of evidence proves the finding of specific adverse impact. In addition, the City cannot require any environmental analysis that would not have been required under the statutory CEQA exemption. If the City fails to approve a housing development project without meeting this high burden, the applicant may bring a claim, and obtain attorney’s fees, if the court determines that the City acted in bad faith. See *District Square, LLC v. City of Los Angeles* (Case No. 20STCP00654) and *Cesar Chavez 888, LLC v. City of Los Angeles* (Case No. (24STCP01880)

The Project does not cause any specific, adverse impacts to public health or safety, and none of the Appeals provide a preponderance of evidence to show a specific, adverse impact of public health and safety sufficient overturn the City’s approval of VTTM 84453 and the statutory CEQA Exemption under AB130.

## VII. Conclusion

We respectfully request that the City Planning Commission uphold the Deputy Advisory Agency approval of the VTTM and the approval of the statutory CEQA Exemption under PRC §21080.66, and deny the three Appeals in their entirety.

Sincerely,



Sheri L. Bonstelle

SLB

Enclosures

Exhibit A – AB130 Chart

Exhibit B – Dudek Fire Safety Analysis

Exhibit C – SGH Wildfire Management Review

cc: Mashaël Majid, CD 4 Deputy Chief of Staff (Mashaël.majid@lacity.org)  
Adrineh Melkonian, City planner (adrineh.melkonian@lacity.org)

# EXHIBIT A

## AB130 – CEQA Statutory Infill Exemption Checklist and Findings

Public Resources Code 21080.66 Section 59

### Project: Riverwalk at Studio City

#### Checklist

No.	Code	Standard	Project	Comply
1.	PRC 21080.66.(a)	CEQA does not apply to a <b>housing development project</b> if it meets all of the following requirements (Gov'n Code 69505.5, 65589.5(h)(2)) <ul style="list-style-type: none"> <li>- proposal to construct a single dwelling unit</li> <li>- residential project</li> <li>- mixed use project (2/3 residential sf, or 50% residential sf with qualifications)</li> <li>- transitional housing</li> <li>- farmworker housing</li> </ul>	89.6% residential floor area <ul style="list-style-type: none"> <li>- 75,968 sf com</li> <li>- 650,854 sf res</li> <li>- 726,822 sf total</li> </ul>	Yes
2.	PRC 21080.66.(a) (1)	<ul style="list-style-type: none"> <li>- Not more than 20 acres, or</li> <li>- Not more than 5 acres for a builders remedy project</li> </ul>	6.01 acres (261,870 sf)	Yes
3.	PRC 21080.66.(a) (2)	<ul style="list-style-type: none"> <li>- Located in an incorporated municipality, or</li> <li>- Located in an urban area (as defined)</li> </ul>	City of LA – incorporated municipality	Yes
4.	PRC 21080.66.(a) (3)	<ul style="list-style-type: none"> <li>- Previously developed with urban use, or</li> <li>- 75% of perimeter adjoins developed urban uses, or</li> <li>- 75% or area within ¼ mile developed urban uses, or</li> <li>- ¾ sides and 2/3 perimeter developed urban uses.</li> </ul>	Developed with big box retail, retail, restaurants, bank, martial arts studio, bowling alley	Yes
5.	PRC 21080.66.(a) (4)	<ul style="list-style-type: none"> <li>- Consistent with general plan, or</li> <li>- Consistent with zoning ordinance, and</li> <li>- Consistent with local coastal plan</li> </ul> <p>- Density Bonus, incentives or concessions, waivers or reductions of development standards, reduced parking ratios under Gov'n Code 65915 not grounds for determining project is inconsistent with general plan, zoning or local coastal plan.</p>	<p>Consistent with</p> <ul style="list-style-type: none"> <li>-C1.5-1VL-RIO zone</li> <li>-Neighborhood Office Commercial land use designation</li> <li>- Ventura/Cahuenga Boulevard Corridor Specific Plan</li> </ul> <p>Except for Density Bonus and incentives/waivers for density, FAR, lot coverage, height, rear yard setback, transitional height, averaging setbacks.</p>	Yes
6.	PRC 21080.66.(a) (5)	<p>At least ½ density specified in Gov'n Code 65583.2(c)(3)(B) (Housing Element):</p> <ul style="list-style-type: none"> <li>- Metro: 30du/acre (1 du / 1,492 sf lot area)</li> <li>- Suburb: 20 du/acre</li> <li>- Nonmetro, unincorporated: 10 du/acre</li> <li>- Nonmetro, incorporated: 15 du/acre</li> </ul>	<p>1 du/321.7 sf lot area complies with Metro density</p> <ul style="list-style-type: none"> <li>- 261,870 sf lot / 814 du</li> </ul>	Yes

**AB130 – CEQA Statutory Infill Exemption Checklist and Findings**

Public Resources Code 21080.66 Section 59

No.	Code	Standard	Project	Comply
7.	PRC 21080.66.(a) (6) Gov'n Code 65913.4 (a)(6)	A. Not in <b>coastal zone area</b> subject to PRC 30603 (1,2) - Coastal zone area not subject to LCP or LUP - Coastal zone area subject to 5' rise - Coastal zone area not zoned for multifamily - Coastal zone area in wetland or farmland	N/A	Yes
8.	PRC 21080.66.(a) (6) Gov'n Code 65913.4 (a)(6)	B. <b>Prime farmland</b>	N/A	Yes
9.	PRC 21080.66.(a) (6) Gov'n Code 65913.4 (a)(6)	C. <b>Wetlands</b>	N/A	Yes
10.	PRC 21080.66.(a) (6) Gov'n Code 65913.4 (a)(6)	D. <b>Very high fire hazard severity zone</b> or state responsibility area, unless it complies with: - PRC 4291, 51182 - PRC 4290 - CBC 7A	Located in VHFHSZ, and will comply with: - PRC 4291, 51182 - PRC 4290 - CBC 7A	Yes
11.	PRC 21080.66.(a) (6) Gov'n Code 65913.4 (a)(6)	E. <b>Hazardous waste site</b> , unless: -- Underground storage tank site with uniform closure letter -- State Dept determined site suitable for residential or mixed use	N/A	Yes
12.	PRC 21080.66.(a) (6) Gov'n Code 65913.4 (a)(6)	F. Designated <b>earthquake fault zone</b>	N/A	Yes
13.	PRC 21080.66.(a) (6) Gov'n Code 65913.4 (a)(6)	G. <b>Special Flood Area</b> subject to 100-year flood, unless: -- Letter of Map Revision, or -- Meets FEMA or NFIP requirements for minimum flood plan management	N/A	Yes
14.	PRC 21080.66.(a) (6) Gov'n Code 65913.4 (a)(6)	H. <b>Regulatory floodway</b> determined by FEMA, unless no rise certification	N/A	Yes
15.	PRC 21080.66.(a) (6) Gov'n Code 65913.4 (a)(6)	I. Identified for <b>conservation</b> in a natural community conservation plan, habitat conservation plan or other natural resource protection plan	N/A	Yes
16.	PRC 21080.66.(a) (6) Gov'n Code 65913.4 (a)(6)	J. <b>Habitat for protected species</b>	N/A	Yes
17.	PRC 21080.66.(a) (6) Gov'n Code 65913.4 (a)(6)	K. <b>Lands under conservation easement</b>	N/A	Yes
18.	PRC 21080.66.(a) (7)	No demolition of structures if: - housing subject to covenant, ord, or law that restricts to moderate, low, very low income - demolition of residential units within past 10 years if tenants	No residential use on Property, and no residential use within prior 10 years.	Yes

**AB130 – CEQA Statutory Infill Exemption Checklist and Findings**

Public Resources Code 21080.66 Section 59

No.	Code	Standard	Project	Comply
		<ul style="list-style-type: none"> <li>- <b>historic structure</b> on the national, state or local historic register</li> <li>- housing units occupied by tenants, and the units were subsequently offered for sale</li> </ul>	No registered historic structure on federal, state or local register	
19.	PRC 21080.66.(a) (8)	After 1/1/2025, no project with a hotel, motel, B&B, other transient lodging, including residential hotel.	No hotel use	Yes
20.	PRC 21080.66.(b)	Government notification to <b>Native American tribe</b> to consult on project and tribal cultural resources: <ul style="list-style-type: none"> <li>- Notice within 14 days of deemed complete application</li> <li>- Tribe has 60 days to accept consult</li> <li>- 45 day consultant with 15 day extension</li> <li>- Provides monitoring mitigation requirement</li> </ul>	Will provide consultation with the tribes	Yes
21.	PRC 21080.66.(c)(1)(a)	Require a <b>Phase I Env. Assessment</b> as a condition of approval of development: <ul style="list-style-type: none"> <li>-- Preliminary endangerment assessment req'd if environmental condition found</li> <li>- If release of hazardous material, release shall be removed and any effects mitigated to regulatory levels prior to C of O</li> <li>- If exposure to significant hazards on surrounding property, mitigate to regulatory levels prior to C of O.</li> </ul>	Will provide Phase I as condition of approval	Yes
22.	PRC 21080.66.(c)(2)	For housing within <b>500 feet of a freeway</b> : <ul style="list-style-type: none"> <li>- HVAC</li> <li>- Outdoor intakes face away from freeway</li> <li>- Air filtration ERV 16</li> <li>- Air filtration replacement</li> <li>- No balconies facing freeway</li> </ul>	4,490 feet from 101 freeway	Yes
23.	PRC 21080.66.(d)(1)	For <b>100% low income affordable housing</b> developments, must be paid prevailing wage for type of work	N/A	Yes
24.	PRC 21080.66.(d)(2)	For buildings over <b>85 feet in height above grade</b> must comply with prevailing wage provisions (Gov'n Code 65913.4(a)(8))	Project is less than 85 feet in height above grade.	Yes
25.	PRC 21080.66.(d)(3)	For projects with 50 units or more in <b>San Francisco</b> , specific prevailing wage provisions apply	N/A	Yes
26.	PRC 21080.66.(e)	This CEQA exemption does not affect the eligibility for a density bonus, incentives, concessions or waivers (Gov'n Code 65915)	The Project is a Density Bonus project	Yes

## AB130 – CEQA Statutory Infill Exemption Checklist and Findings

Public Resources Code 21080.66 Section 59

### I. Findings

#### A. Residential or Mixed-Use (PRC 21080.66.(a))

CEQA does not apply to a **housing development project** if it is a residential mixed-use project with 2/3 of the floor area utilized for residential uses. The proposed project has a square footage of approximately 726,822 square footage total, of which 650,854 square feet is residential use (89.6% of the total floor area), and 75,968 square feet is commercial use. Therefore, the Project qualifies.

#### B. Property Size (PRC 21080.66.(a) (1))

The property may not be more than 20 acres, and the Project's Property is 6.01 acres (261,870 sf). Therefore, the Project qualifies.

#### C. Project Location (PRC 21080.66.(a) (2))

The property must be located in a an incorporated municipality, or located in an urban area (as defined). The Property is located within the boundaries of the City of Los Angeles, an incorporated municipality. Therefore, the Project qualifies.

#### D. Prior Land Use (PRC 21080.66.(a) (3))

The property must have been previously developed with an urban land use, or surrounded with urban land uses (as defined). The Property was previously developed with numerous urban land uses, including big box retail stores (Bed Bath & Beyond, Staples), retail, restaurants, bank, martial arts studio, and a bowling alley. Therefore, the Project qualifies.

#### E. Consistency with the General Plan and Zoning (PRC 21080.66.(a) (4))

The project must be consistent with the general plan, zoning ordinance, and the local coastal plan, if any. A project may obtain consistency through Density Bonus incentives or concessions, waivers or reductions of development, or reduced parking ratios under Gov'n Code 65915, and these are not grounds for determining that a project is inconsistent with the general plan, zoning or local coastal plan.

The project is located within the C1.5-1VL-RIO zone, and has a Neighborhood Office Commercial land use designation. The property is also located within the Ventura/Cahuenga Boulevard Corridor Specific Plan. The property is not in the coastal zone. The project is a density bonus project that provides the required affordable housing, and requests incentives/waivers of development standards, including density, FAR, lot coverage, height, rear yard setback, transitional height, averaging setbacks. The request of the incentives/waivers is not grounds for determining that a project is inconsistent with the C1.5-1VL-RIO zone and the Neighborhood Office Commercial land use designation. If the incentives and waivers are granted, the project is consistent with the zoning and general plan. Therefore, the Project qualifies.

#### F. Minimum Residential Density (PRC 21080.66.(a) (5))

**The project must have a minimum residential density of at least half of the residential density** specified in Gov'n Code 65583.2(c)(3)(B) (Housing Element), which is 30 dwelling units per acre (1 du/1,495 sf lot area) for Metro areas, and 20 dwelling units/acre for Suburban areas. The project is located in a Metro area in the City of Los Angeles. The proposed density is one dwelling unit per 321.7

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square feet of lot area (261,870 sf lot / 814 du), which exceeds the Metro minimum density of one unit per 1,495 square feet of lot area. Therefore, the Project qualifies.

### G. **Project Location** (PRC 21080.66.(a) (6), Gov'n Code 65913.4 (a)(6))

With certain exceptions, the project may not be in: a coastal zone area subject to PRC 30603 (1,2); Prime farmland; Wetlands; Very high fire hazard severity zone (VHFHSZ) or state responsibility area (with certain exceptions); Hazardous waste site (with certain exceptions); designated earthquake fault zone; Special Flood Area subject to 100-year flood (with certain exceptions); Regulatory floodway determined by FEMA (with certain exceptions); Identified for conservation in a natural community conservation plan, habitat conservation plan or other natural resource protection plan; and Lands under conservation easement. The property is not within any of these restricted areas, except that the property is located within a very high fire hazard severity zone (VHFHSZ).

AB130 permits a project to be located in a VHFHSZ, if it complies with Public Resource Code sections 4291 or 51182, Public Resources Code section 4290, and California Building Code section 7A. The project fully complies with the referenced State laws and building codes as follows:

As set forth in the Technical Memorandum for Riverwalk at Studio City by Dudek, dated September 26, 2025 (the "Fire Code Analysis"), the Project complies with the State laws, City ordinances, and building and fire code requirements.

#### 1. **PRC 4291 and 51182**

Public Resources Code Section 4291 (PC 4291) requires a person who owns, leases, controls, operates, or maintains a building or structure on land in a SRA to provide and maintain defensible space of 100 feet from each side and from the front and rear of the structure, but generally not beyond the property line. Assembly Bill 3074, which was approved in 2020 and amended PRC 4291, requires a Zone 0 vegetation fuel modification zone, which is a 5-foot ember-resistant zone around structures in designated SRAs.

Government Code Section 51182 (GC 51182) requires a person who owns, leases, controls, operates, or maintains an occupied dwelling or occupied structure within a designated LRA VHFHSZ to provide and maintain defensible space of 100 feet from each side and from the front and rear of the structure, but generally not beyond the property line. GC 51182 also contains fire prevention provisions regarding the location and maintenance of trees, maintenance of roofs, and Building Code compliance. Senate Bill 504, which was approved in 2024 and amended GC 51182, requires a Zone 0 vegetation fuel modification zone, which is a 5-foot ember-resistant zone around structures in designated LRA VHFHSZs

#### 2. **PRC 4290**

Public Resources Code Section 4290 (PRC 4290) requires the Board of Forestry to adopt regulations implementing minimum fire safety standards related to defensible space that are applicable to State Responsibility Area (SRA) lands and to lands classified and designated as LRA VHFHSZs, as defined in subdivision (i) of Section 51177 of the Government Code. These regulations are found in Title 14, Division 1.5, Chapter 7 and are known as the State Minimum Fire Safe Regulations. The regulations apply to the perimeters and access to all residential, commercial, and industrial building construction within SRAs and designated VHFHSZs within LRAs. PRC 4290 provides the State Fire Marshal with the authority to adopt regulations for roof coverings and openings into the attic areas of buildings and to adopt

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standards for fire equipment access roads; signs identifying streets, roads, and buildings; and vegetation fuel breaks and greenbelts.

### **3. CBC section 7A**

California Building Code Chapter 7A mandates specific fire resistant construction and material standards for new buildings located in Wildland Urban Interface (WUI) fire areas. It was established to protect life and property by reducing a building's vulnerability to flames and embers from wildfires. Key requirements include ignition-resistant and fire-resistant exterior materials, such as siding, decking, and vents, designed to withstand the rigors of a wildfire environment.

### **4. Project Compliance**

As set forth in detail in the Fire Code Analysis, the Project fully complies with PRC 4291 and 51182, PRC 4290, and CBC section 7A.

The Riverwalk at Studio City project (Project) proposes to repurpose 6.01 acres on the northwest corner of Ventura Blvd. and Whitsett Avenue with a mixed-use development consisting of residential apartment units and commercial space that includes two-story restaurants and seven-story residential buildings built over subterranean parking. The construction types for the Project are Type 3 for the residential units over Type 1 for the garages. The Project is located in a California Department of Forestry and Fire Protection (CAL FIRE) designated Local Responsibility Area (LRA) Very High Fire Hazard Severity Zone (VHFHSZ).

As determined by the Los Angeles Department of Water and Power, the Project has the infrastructure to comply with water supply and fire flow requirements and substantially complies with fire apparatus access requirements. The Project provides the 200 feet of defensible space because it is located in a VHFHSZ, and the space includes the Los Angeles River and existing adjacent urban development and adjacent streets. The Project includes both ground-level and rooftop landscaping, which is required to be approved by LAFD Fuel Modification Plan Checkers who evaluate each project independently based on site, hazard, and vegetation characteristics. The Fire Code Analysis evaluates the proposed landscaping and concludes that they comply with the code requirements. The palm species that are existing on the Project site and proposed to remain are limited to Fuel Modification Zone B. Some of the proposed new trees and shrubs have limitations with regard to fuel modification zone, proximity to structure, and height. The entirety of the trees and shrubs proposed for the Project will have to be reviewed and approved by the LAFD.

Because the Project complies with PRC 4291 and 51182, PRC 4290, and CBC section 7A, the Project falls within the exception for properties in the VHFHSZ. Therefore, the Project qualifies.

#### **H. No Demolition of Historic Structures and Certain Housing Units (PRC 21080.66.(a) (7))**

AB130 prohibits the demolition of historic structures that are designated on the national, state or local historic register. The Property does not include any designated historic resources.

AB130 prohibits the demolition of housing that is subject to a covenant, ordinance or law that restricts the rents to moderate, low, or very low income, residential units with tenants in the past 10 years, and residential unit that were occupied by tenants and subsequently offered for sale. The Property has existing and prior commercial uses, and has not had any residential uses on the Property in the past 10 years. . Therefore, the Project qualifies.

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### I. No Hotel Uses (PRC 21080.66.(a) (8))

After 1/1/2025, the project may not have a hotel, motel, B&B, or other transient lodging, including a residential hotel. The Project does not include a hotel or transient lodging use. . Therefore, the Project qualifies.

### II. Relevant Code Sections

**PRC 21080.66.(a)** Without limiting any other statutory or categorical exemption, this division does not apply to any aspect of a housing development project, as defined in subdivision (b) of Section 65905.5 of the Government Code, including any permits, approvals, or public improvements required for the housing development project, as may be required by this division, if the housing development project meets all of the following conditions:

(1) (A) Except as provided in subparagraph (B), the project site is not more than 20 acres.

(B) The project site or the parcel size for a builder's remedy project, as defined in paragraph (11) of subdivision (h) of Section 65589.5 of the Government Code, or the project site or the parcel size for a project that applied pursuant to paragraph (5) of subdivision (d) of Section 65589.5 of the Government Code as it read before January 1, 2025, is not more than five acres.

(2) The project site meets either of the following criteria:

(A) Is located within the boundaries of an incorporated municipality.

(B) Is located within an urban area, as defined by the United States Census Bureau.

(3) The project site meets any of the following criteria:

(A) Has been previously developed with an urban use.

(B) At least 75 percent of the perimeter of the site adjoins parcels that are developed with urban uses.

(C) At least 75 percent of the area within a one-quarter mile radius of the site is developed with urban uses.

(D) For sites with four sides, at least three out of four sides are developed with urban uses and at least two-thirds of the perimeter of the site adjoins parcels that are developed with urban uses.

(4) (A) The project is consistent with the applicable general plan and zoning ordinance, as well as any applicable local coastal program as defined in Section 30108.6. For purposes of this section, a housing development project shall be deemed consistent with the applicable general plan and zoning ordinance, and any applicable local coastal program, if there is substantial evidence that would allow a reasonable person to conclude that the housing development project is consistent.

(B) If the zoning and general plan are not consistent with one another, a project shall be deemed consistent with both if the project is consistent with one.

(C) The approval of a density bonus, incentives or concessions, waivers or reductions of development standards, and reduced parking ratios pursuant to Section 65915 of the Government Code shall not be grounds for determining that the project is inconsistent with the applicable general plan, zoning ordinance, or local coastal program.

(5) The project will be at least one-half of the applicable density specified in subparagraph (B) of paragraph (3) of subdivision (c) of Section 65583.2 of the Government Code.

(6) The project satisfies the requirements specified in paragraph (6) of subdivision (a) of Section 65913.4 of the Government Code.

(7) The project does not require the demolition of a historic structure that was placed on a national, state, or local historic register before the date a preliminary application was submitted for the project pursuant to Section 65941.1 of the Government Code.

(8) For a project that was deemed complete pursuant to paragraph (5) of subdivision (h) of Section 65589.5 of the Government Code on or after January 1, 2025, no portion of the project is designated for use as a hotel, motel, bed and breakfast inn, or other transient lodging. For the purposes of this section, "other transient lodging" does not include either of the following:

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(A) A residential hotel, as defined in Section 50519 of the Health and Safety Code.

(B) After the issuance of a certificate of occupancy, a resident's use or marketing of a unit as short-term lodging, as defined in Section 17568.8 of the Business and Professions Code, in a manner consistent with local law.

**Gov'n Code 65583.2(c)(3)(B)** The following densities shall be deemed appropriate to accommodate housing for lower income households:

(i) For an incorporated city within a nonmetropolitan county and for a nonmetropolitan county that has a micropolitan area: sites allowing at least 15 units per acre.

(ii) For an unincorporated area in a nonmetropolitan county not included in clause (i): sites allowing at least 10 units per acre.

(iii) For a suburban jurisdiction: sites allowing at least 20 units per acre.

(iv) For a jurisdiction in a metropolitan county: sites allowing at least 30 units per acre.

**Gov'n Code 65913.4 (a)(6)** The development is not located on a site that is any of the following:

(A) (i) An area of the coastal zone subject to paragraph (1) or (2) of subdivision (a) of Section 30603 of the Public Resources Code.

(ii) An area of the coastal zone that is not subject to a certified local coastal program or a certified land use plan.

(iii) An area of the coastal zone that is vulnerable to five feet of sea level rise, as determined by the National Oceanic and Atmospheric Administration, the Ocean Protection Council, the United States Geological Survey, the University of California, or a local government's coastal hazards vulnerability assessment.

(iv) In a parcel within the coastal zone that is not zoned for multifamily housing.

(v) In a parcel in the coastal zone and located on either of the following:

(I) On, or within a 100-foot radius of, a wetland, as defined in Section 30121 of the Public Resources Code.

(II) On prime agricultural land, as defined in Sections 30113 and 30241 of the Public Resources Code.

(B) Either prime farmland or farmland of statewide importance, as defined pursuant to the United States Department of Agriculture land inventory and monitoring criteria, as modified for California, and designated on the maps prepared by the Farmland Mapping and Monitoring Program of the Department of Conservation, or land zoned or designated for agricultural protection or preservation by a local ballot measure that was approved by the voters of that jurisdiction.

(C) Wetlands, as defined in the United States Fish and Wildlife Service Manual, Part 660 FW 2 (June 21, 1993).

(D) Within a very high fire hazard severity zone, as determined by the Department of Forestry and Fire Protection pursuant to Section 51178, or within the state responsibility area, as defined in Section 4102 of the Public Resources Code. This subparagraph does not apply to sites that have adopted fire hazard mitigation measures pursuant to existing building standards or state fire mitigation measures applicable to the development, including, but not limited to, standards established under all of the following or their successor provisions:

(i) Section 4291 of the Public Resources Code or Section 51182, as applicable.

(ii) Section 4290 of the Public Resources Code.

(iii) Chapter 7A of the California Building Code (Title 24 of the California Code of Regulations).

(E) A hazardous waste site that is listed pursuant to Section 65962.5 or a hazardous waste site designated by the Department of Toxic Substances Control pursuant to Section 25356 of the Health and Safety Code, unless either of the following apply:

(i) The site is an underground storage tank site that received a uniform closure letter issued pursuant to subdivision (g) of Section 25296.10 of the Health and Safety Code based on closure criteria established by the

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State Water Resources Control Board for residential use or residential mixed uses. This section does not alter or change the conditions to remove a site from the list of hazardous waste sites listed pursuant to Section 65962.5.

(ii) The State Department of Public Health, State Water Resources Control Board, Department of Toxic Substances Control, or a local agency making a determination pursuant to subdivision (c) of Section 25296.10 of the Health and Safety Code, has otherwise determined that the site is suitable for residential use or residential mixed uses.

(F) Within a delineated earthquake fault zone as determined by the State Geologist in any official maps published by the State Geologist, unless the development complies with applicable seismic protection building code standards adopted by the California Building Standards Commission under the California Building Standards Law (Part 2.5 (commencing with Section 18901) of Division 13 of the Health and Safety Code), and by any local building department under Chapter 12.2 (commencing with Section 8875) of Division 1 of Title 2.

(G) Within a special flood hazard area subject to inundation by the 1 percent annual chance flood (100-year flood) as determined by the Federal Emergency Management Agency in any official maps published by the Federal Emergency Management Agency. If a development proponent is able to satisfy all applicable federal qualifying criteria in order to provide that the site satisfies this subparagraph and is otherwise eligible for streamlined approval under this section, a local government shall not deny the application on the basis that the development proponent did not comply with any additional permit requirement, standard, or action adopted by that local government that is applicable to that site. A development may be located on a site described in this subparagraph if either of the following are met:

(i) The site has been subject to a Letter of Map Revision prepared by the Federal Emergency Management Agency and issued to the local jurisdiction.

(ii) The site meets Federal Emergency Management Agency requirements necessary to meet minimum flood plain management criteria of the National Flood Insurance Program pursuant to Part 59 (commencing with Section 59.1) and Part 60 (commencing with Section 60.1) of Subchapter B of Chapter I of Title 44 of the Code of Federal Regulations.

(H) Within a regulatory floodway as determined by the Federal Emergency Management Agency in any official maps published by the Federal Emergency Management Agency, unless the development has received a no-rise certification in accordance with Section 60.3(d)(3) of Title 44 of the Code of Federal Regulations. If a development proponent is able to satisfy all applicable federal qualifying criteria in order to provide that the site satisfies this subparagraph and is otherwise eligible for streamlined approval under this section, a local government shall not deny the application on the basis that the development proponent did not comply with any additional permit requirement, standard, or action adopted by that local government that is applicable to that site.

(I) Lands identified for conservation in an adopted natural community conservation plan pursuant to the Natural Community Conservation Planning Act (Chapter 10 (commencing with Section 2800) of Division 3 of the Fish and Game Code), habitat conservation plan pursuant to the federal Endangered Species Act of 1973 (16 U.S.C. Sec. 1531 et seq.), or other adopted natural resource protection plan.

(J) Habitat for protected species identified as candidate, sensitive, or species of special status by state or federal agencies, fully protected species, or species protected by the federal Endangered Species Act of 1973 (16 U.S.C. Sec. 1531 et seq.), the California Endangered Species Act (Chapter 1.5 (commencing with Section 2050) of Division 3 of the Fish and Game Code), or the Native Plant Protection Act (Chapter 10 (commencing with Section 1900) of Division 2 of the Fish and Game Code).

(K) Lands under conservation easement.

**PRC 21080.66.(b) (1)** (A) A local government shall provide formal notification via certified mail and email to each California Native American tribe that is traditionally and culturally affiliated with the project site as an invitation to consult on the proposed project, its location, and the project's potential effects on tribal cultural resources pursuant to one of the following deadlines:

(i) Within 14 days of the application for the project being deemed complete pursuant to paragraph (5) of subdivision (h) of Section 65589.5 of the Government Code.

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(ii) For projects whose applications were deemed complete pursuant to paragraph (5) of subdivision (h) of Section 65589.5 of the Government Code before July 1, 2026, within 14 days of notifying the local government that the project is eligible to be exempt from this division pursuant to this section.

(B) The formal notification shall include all of the following:

(i) Detailed project information to help inform the consultation, including site maps, proposed project scope, and any known cultural resource studies.

(ii) Contact information for the local government.

(iii) Contact information for the project proponent.

(iv) Notice that the California Native American tribe has 60 days to request consultation with the local government pursuant to this subdivision.

(2) (A) Each California Native American tribe has 60 days to notify the local government that it accepts the invitation to consult.

(B) If a California Native American tribe chooses not to accept the invitation to consult, or does not notify the local government of its decision within 60 days, the consultation shall be considered to have concluded.

(3) (A) Within 14 days of receiving the notification that the California Native American tribe has elected to consult, pursuant to subparagraph (A) of paragraph (2), the local government shall initiate the consultation.

(B) During the consultation, the local government shall act in good faith to identify whether a tribal cultural resource could be affected by the proposed project and shall give deference to the tribal information, tribal knowledge and customs, and the significance of the resource to the California Native American tribe.

(C) The project proponent may participate in the consultation with the approval of the California Native American tribe if the project proponent agrees to engage in good faith and comply with the confidentiality requirements of Sections 7927.000 and 7927.005 of the Government Code, subdivision (d) of Section 21082.3, subdivision (d) of Section 15120 of Title 14 of the California Code of Regulations, and any confidentiality standards adopted by the California Native American tribe participating in the consultation.

(D) The consultation shall seek to find measures that would avoid significant impacts to a tribal cultural resource.

(E) The local government shall document the results of the consultation.

(F) The consultation shall conclude within 45 days of initiation, subject to a one-time 15-day extension upon request by a participating California Native American tribe.

(4) The local government shall include, as binding conditions of the project approval, all of the following:

(A) Any enforceable agreements reached during the project consultation.

(B) All of the following measures, unless there is mutual agreement between the California Native American tribe and the project proponent not to include the measure as a binding condition:

(i) Upon request by a California Native American tribe, the project shall include tribal monitoring during all ground-disturbing activities, as follows:

(I) The California Native American tribe shall designate the monitor.

(II) The tribal monitor shall comply with applicant's site access and workplace safety requirements.

(III) The applicant shall compensate the tribal monitor at a reasonable rate, determined in good faith, that aligns with customary compensation for cultural resource monitoring, taking into account factors such as the scope and duration of the project.

(ii) Tribal cultural resources shall be avoided where feasible, in accordance with subdivision (a) of Section 21084.3. In furtherance of this requirement, where feasible, the project applicant shall provide deference to tribal preferences regarding access to spiritual, ceremonial, and burial sites, and incorporate tribal traditional knowledge in the protection and sustainable use of tribal cultural resources and landscapes.

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(iii) All treatment and documentation of tribal cultural resources shall be conducted in a culturally appropriate manner, consistent with Section 21083.9.

(iv) A California Historical Resources Information System archaeological records search and a tribal cultural records search shall be completed for the project site.

(v) A Sacred Lands Inventory request shall be submitted to the Native American Heritage Commission.

(vi) The project shall comply with Section 7050.5 of the Health and Safety Code and Section 5097.98, including immediate work stoppage upon discovery of human remains or burial grounds, and treatment in accordance with applicable law and in consultation with the affected California Native American tribe.

(vii) An application of tribal ecological knowledge into habitat restoration efforts undertaken by the project as applicable to the specific environmental context and conditions of the project.

(5) For purposes of this subdivision, the following definitions apply:

(A) "California Native American tribe" has the same meaning as defined in Section 21073.

(B) "Enforceable agreement" means an agreement between the local government, project proponent, and any California Native American tribe that has engaged in consultation pursuant to this subdivision regarding the methods, measures, and conditions for tribal cultural resource identification, treatment, and protection, including consideration of avoidance. Compliance with the enforceable agreement shall be a required condition of approval for the project and its terms must be enforceable against the project proponent by the local government and the California Native American tribe.

(C) "Tribal cultural resource" means a site, feature, place, cultural landscape, sacred place, including a Native American sanctified cemetery, Indian cemetery, or Indian burial area, or an object with cultural value to a California Native American tribe that is any of the following:

(i) Included or eligible for inclusion in the California Register of Historical Resources or the National Register of Historic Places.

(ii) Included in a local register of historical resources as defined in subdivision (k) of Section 5020.1.

(iii) Identified by the Native American Heritage Commission as a sacred place pursuant to Section 5097.94 or 5097.96.

(iv) Included in a local tribal register.

**PRC 21080.66(c) (1)** (A) The local government shall, as a condition of approval for the development, require the development proponent to complete a phase I environmental assessment, as defined in Section 78090 of the Health and Safety Code.

(B) If a recognized environmental condition is found, the development proponent shall complete a preliminary endangerment assessment, as defined in Section 78095 of the Health and Safety Code, prepared by an environmental assessor to determine the existence of any release of a hazardous substance on the site and to determine the potential for exposure of future occupants to significant health hazards from any nearby property or activity.

(C) If a release of a hazardous substance is found to exist on the site, the release shall be removed or any effects of the release shall be mitigated to levels required by current federal and state statutory and regulatory standards before the local government issues a certificate of occupancy.

(D) If a potential for exposure to significant hazards from surrounding properties or activities is found to exist, the effects of the potential exposure shall be mitigated to levels required by current federal and state statutory and regulatory standards before the local government issues a certificate of occupancy.

(2) For any housing on the site located within 500 feet of a freeway, all of the following shall apply:

(A) The building shall have a centralized heating, ventilation, and air-conditioning system.

(B) The outdoor air intakes for the heating, ventilation, and air-conditioning system shall face away from the freeway.

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(C) The building shall provide air filtration media for outside and return air that provides a minimum efficiency reporting value of 16.

(D) The air filtration media shall be replaced at the manufacturer’s designated interval.

(E) The building shall not have any balconies facing the freeway.

**PRC 21080.66(d)** (1) Notwithstanding any other law, all construction workers employed in the execution of a housing development project exempt from this division pursuant to this section where 100 percent of the units within the development project are dedicated to lower income households, as defined by Section 50079.5 of the Health and Safety Code, shall be paid at least the general prevailing rate of per diem wages for the type of work and geographic area, as determined by the Director of Industrial Relations pursuant to Sections 1773 and 1773.9 of the Labor Code, except that apprentices registered in programs approved by the Chief of the Division of Apprenticeship Standards may be paid at least the applicable apprentice prevailing rate, regardless of whether the housing development project is a public work.

(2) Notwithstanding any other law, the labor standards of paragraph (8) of subdivision (a) of Section 65913.4 of the Government Code shall apply to buildings over 85 feet in height above grade in any housing development project exempt from this division pursuant to this section.

(3) (A) Notwithstanding any other law, the labor standards of Article 4 (commencing with Section 65912.130) of Chapter 4.1 of Division 1 of Title 7 of the Government Code shall apply for projects of 50 units or greater in the City and County of San Francisco that are not covered by paragraph (2), for any construction craft where at least 50 percent of the units in market-rate multifamily housing projects that received their certificate of occupancy between 2022 and 2024, inclusive, were built by workers that were paid not less than the general prevailing rate of per diem wages.

(B) For purposes of this section, “market-rate multifamily housing development project” means a housing development project of greater than 10 units where less than 95 percent of the units are dedicated to lower income households, as defined by Section 50079.5 of the Health and Safety Code.

(C) (i) The eligibility of this subparagraph, by classification, will be determined by the Department of Industrial Relations and published on its internet website by January 1, 2026.

(ii) In making a determination of eligibility pursuant to this subparagraph, the Director of Industrial Relations shall obtain and consider data from the labor organizations and employers or employer associations concerned no later than October 1, 2025.

(iii) To determine the number of market-rate multifamily housing projects that received their certificate of occupancy in a given year, the Department of Industrial Relations shall use the annual progress report data as reported by the jurisdiction pursuant to Section 65400 of the Government Code.

(4) The provisions of Section 218.8 of the Labor Code shall extend to the development proponent in addition to the direct contractor or subcontractor. For purposes of this paragraph, “development proponent” shall mean a developer who submits the housing development project application to a local government that is exempt from this division pursuant to this section.

(5) (A) A joint labor-management cooperation committee established pursuant to the federal Labor Management Cooperation Act of 1978 (29 U.S.C. Sec. 175a) may undertake any of the following on a housing development project that is exempt from this division pursuant to this section:

(i) Bring an action in a court of competent jurisdiction against a contractor or subcontractor at any tier on behalf of construction workers employed by the contractor or subcontractor on a housing development project that is exempt from this division pursuant to this section to enforce Section 226 of the Labor Code. A contractor is not subject to an action pursuant to this subparagraph due to the failure of a subcontractor to comply with Section 226 of the Labor Code.

(ii) Bring an action in a court of competent jurisdiction on behalf of an affected employee against an employer for damages as if Division 4 (commencing with Section 3200) of the Labor Code did not apply, if the employer fails to secure the payment of compensation as

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required by Article 1 (commencing with Section 3700) of Chapter 4 of Part 1 of Division 4 of the Labor Code.

(iii) In addition to the remedies set forth in Section 7028.3 of the Business and Professions Code, on proper showing by a joint labor-management cooperation committee of a continuing violation of Chapter 9 (commencing with Section 7000) of Division 3 of the Business and Professions Code by a person who constructs a housing project and does not hold a state contractor's license in any classification, an injunction shall issue by a court specified in Section 7028.3 of the Business and Professions Code at the request of the joint labor-management cooperation committee, prohibiting that violation.

(B) For any action brought pursuant to this paragraph, the court shall award a prevailing joint labor-management committee its reasonable attorney's fees and costs incurred maintaining the action.

(C) An action brought pursuant to this paragraph shall be filed within one year of a local government issuing a certificate of occupancy for the housing development project or for the portion relating to the action.

(D) This paragraph shall apply only to violations that occur on the site of construction of the housing development project.

(e) This section does not affect the eligibility of a housing development project for a density bonus, incentives or concessions, waivers or reductions of development standards, and reduced parking ratios pursuant to Section 65915 of the Government Code.

**Gov'n Code 65598.5 (h)** The following definitions apply for the purposes of this section:

(1) "Feasible" means capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, and technological factors.

(2) "Housing development project" means a use consisting of any of the following:

(A) **Residential units only.**

(B) **Mixed-use developments** consisting of residential and nonresidential uses that meet any of the following conditions:

(i) At least two-thirds of the new or converted square footage is designated for residential use.

(ii) At least 50 percent of the new or converted square footage is designated for residential use and the project meets both of the following:

(I) The project includes at least 500 net new residential units.

(II) No portion of the project is designated for use as a hotel, motel, bed and breakfast inn, or other transient lodging, except a portion of the project may be designated for use as a residential hotel, as defined in Section 50519 of the Health and Safety Code.

(iii) At least 50 percent of the net new or converted square footage is designated for residential use and the project meets all of the following:

(I) The project includes at least 500 net new residential units.

(II) The project involves the demolition or conversion of at least 100,000 square feet of nonresidential use.

(III) The project demolishes at least 50 percent of the existing nonresidential uses on the site.

(IV) No portion of the project is designated for use as a hotel, motel, bed and breakfast inn, or other transient lodging, except a portion of the project may be designated for use as a residential hotel, as defined in Section 50519 of the Health and Safety Code.

(C) **Transitional housing** or supportive housing.

(D) **Farmworker housing**, as defined in subdivision (h) of Section 50199.7 of the Health and Safety Code.

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**PRC 21080.66(e)** This section does not affect the eligibility of a housing development project for a density bonus, incentives or concessions, waivers or reductions of development standards, and reduced parking ratios pursuant to Section 65915 of the Government Code.

## TECHNICAL MEMORANDUM

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**To:** Jonathan Genton, Genton Cockrum Partners  
**From:** Dudek Fire Protection Planning Team, Austin Ott and Rob Ball  
**Subject:** Riverwalk at Studio City Due Diligence Assessment  
**Date:** September 26, 2025  
**Attachment(s):** Figure 1 – Fire Hazard Severity Zones  
Figure 2 – Fire History  
Attachment 1 – Fire Flow Report  
Attachment 2 – Plant Selection Guidelines

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### Introduction

Dudek was commissioned by Genton Cockrum Partners to provide a due diligence technical assessment of the Riverwalk at Studio City project (Project). This assessment provides a review of the related fire code requirements for the Project and the Project site, inclusive of fire apparatus access, water supply, and defensible space for wildfire protection. This analysis will confirm compliance with the applicable fire codes and, where such is the case, identify any non-complying aspects of the Project and provide recommendations for addressing or correcting the Project element of concern.

The Project proposes to repurpose 6.01 acres on the northwest corner of Ventura Blvd. and Whitsett Avenue bounded by Ventura Blvd. to the southwest, Whitsett Avenue to the east, Valleyheart Drive to the northeast, and the San Fernando Valley Condos to the northwest. The Project site is currently developed with four commercial and retail buildings. The Project proposes a mixed-use development consisting of 814 residential apartment units and 75,968 square feet of commercial space. Buildings proposed for the Project include two-story restaurants and seven-story residential buildings constructed over subterranean parking. Overall building height to the roof of the residential buildings, measured in accordance with the adopted fire code, is approximately 71 feet above grade with the highest occupiable floor approximately 60 feet above grade. The Project site includes plazas, courtyards, pool and deck areas, and pedestrian access to the Los Angeles River. The construction types for the Project are Type 3 for the residential units over Type 1 for the garages.<sup>1</sup>

The Project is located in a California Department of Forestry and Fire Protection (CAL FIRE) designated Local Responsibility Area (LRA) Very High Fire Hazard Severity Zone (VHFHSZ). *Figure 1 – Fire Hazard Severity Zones* shows the Project site relative to the designated fire hazard severity zones. The Santa Monica Mountains to the south of the Project site are the primary wildfire hazard area. As shown in *Figure 2 – Fire History*, the Santa Monica

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<sup>1</sup> Riverwalk at Studio City. Project plan set.

Mountains have an extensive wildfire history, however none of the recorded fires have burned onto the Project site, and the most recent fire near the Project site was in 1963, likely prior to development of the area. A CAL FIRE designation as a fire hazard severity zone does not indicate that an area is not safe for development. Rather, a fire hazard severity zone designation indicates that specific fire protection features that minimize structure vulnerability to a wildfire event will be required. The Los Angeles Fire Department (LAFD) is the fire authority having jurisdiction for the Project site.

# 1 Regulatory Analysis

The development of the Project is regulated by adopted legislation, codes, and standards. The regulatory environment has been shaped by post-fire analysis and controlled laboratory research. The applicable codes are discussed in this section. The Project is also affected by Assembly Bill 130, the recent state budget trailer bill that provides a new statutory exemption from the California Environmental Quality Act (CEQA) for certain urban infill housing development projects.

## 1.1 Los Angeles Building Code

The City has adopted the 2023 Los Angeles Building Code, which is a combination of the 2022 California Building Code with City of Los Angeles amendments. Chapter 7A of the Building Code contains the materials and construction methods for exterior wildfire exposure. The purpose of Chapter 7A is to establish minimum standards for the protection of life and property by increasing the ability of a building located in any fire hazard severity zone to resist the intrusion of flames or burning embers projected by a vegetation fire and to contribute to a systematic reduction in conflagration losses. The construction requirements in Chapter 7A are applicable to the Project due to its location in a designated LRA VHFHSZ.

## 1.2 Los Angeles Fire Code

The City of Los Angeles has also adopted the 2023 Los Angeles Fire Code, which is a combination of the 2022 California Fire Code with City of Los Angeles amendments. Chapter 5 of the Fire Code contains the basic provisions for fire apparatus access and water supply. Chapter 49 of the Fire Code contains the fire safety requirements for wildland-urban interface fire areas and fire hazard severity zones, which include requirements for fire protection plans and vegetation fuel modification and management. Appendix D of the Fire Code contains more specific requirements for fire apparatus access than Chapter 5 of the Fire Code. The appendix is not part of the Fire Code unless it is specifically adopted by the local fire agency. LAFD has adopted Appendix D with amendments.

## 1.3 Government Code 51182

Government Code Section 51182 (GC 51182) requires a person who owns, leases, controls, operates, or maintains an occupied dwelling or occupied structure within a designated LRA VHFHSZ to provide and maintain defensible space of 100 feet from each side and from the front and rear of the structure, but generally not beyond the property line. GC 51182 also contains fire prevention provisions regarding the location and maintenance of trees, maintenance of roofs, and Building Code compliance. Senate Bill 504, which was approved in 2024 and amended GC 51182, requires a Zone 0 vegetation fuel modification zone, which is a 5-foot ember-resistant zone around structures in designated LRA VHFHSZs.

## 1.4 Public Resources Code 4290

Public Resources Code Section 4290 (PRC 4290) requires the Board of Forestry to adopt regulations implementing minimum fire safety standards related to defensible space that are applicable to State Responsibility Area (SRA) lands and to lands classified and designated as LRA VHFHSZs, as defined in subdivision (i) of Section 51177 of the Government Code. These regulations are found in Title 14, Division 1.5, Chapter 7 and are known as the State Minimum Fire Safe Regulations. The regulations apply to the perimeters and access to all residential, commercial, and industrial building construction within SRAs and designated VHFHSZs within LRAs. PRC 4290 provides the State Fire Marshal with the authority to adopt regulations for roof coverings and openings into the attic areas of buildings and to adopt standards for fire equipment access roads; signs identifying streets, roads, and buildings; and vegetation fuel breaks and greenbelts.

## 1.5 Public Resources Code 4291

Public Resources Code Section 4291 (PC 4291) requires a person who owns, leases, controls, operates, or maintains a building or structure on land in a SRA to provide and maintain defensible space of 100 feet from each side and from the front and rear of the structure, but generally not beyond the property line. Assembly Bill 3074, which was approved in 2020 and amended PRC 4291, requires a Zone 0 vegetation fuel modification zone, which is a 5-foot ember-resistant zone around structures in designated SRAs.

## 1.6 Assembly Bill 130

Assembly Bill 130 (AB 130) is one of two trailer bills that were attached to the recent state budget adoption that revised the California Environmental Quality Act (CEQA) to add statutory exemptions for certain types of projects, including housing projects. Specifically, AB 130 includes Public Resources Code section 21080.66, which establishes a new statutory exemption for qualifying housing development projects that are 20 acres or less in size and meet other specific criteria.

One of the new CEQA statutory exemptions allowed by AB 130 is an infill exemption. This provision exempts urban infill projects of up to 20 acres, which have a substantial housing component to the project, from CEQA review if the project meets several criteria. The legislation updated Government Code Section 65913.4, which excludes projects from this exemption if the project is located in within a LRA VHFHSZ, as determined by CAL FIRE pursuant to Government Code Section 51178, or within the SRA, as defined in Public Resources Code Section 4102.

However, projects in a designated SRA or LRA VHFHSZ do qualify for the CEQA exemption if the project has adopted fire hazard mitigation measures pursuant to existing building standards or state fire mitigation measures applicable to the development, including, but not limited to, standards established under all of the following:

- Public Resources Code Section 4291 or Government Code Section 51182.
- Public Resources Code Section 4290.
- California Building Code Chapter 7A.

## 1.7 Regulatory Compliance

Los Angeles Municipal Code Chapter 5, Article 7, Section 57 formally adopts amended versions of the California Building and Fire Codes and includes the provisions of PRC 4290 and 4291 along with the provisions of GC 51182.

The Project will be in compliance with the applicable provisions of Chapter 7A of the California Building Code, Chapter 49 of the California Fire Code, Sections 4290 and 4291 of the Public Resources Code, and Section 51182 of the Government Code. The Project qualifies for the infill housing project exemption from CEQA established by AB 130 and codified in Section 65913 of the Government Code.

## 2 Fire Access

Section 503 and Appendix D of the Fire Code contain the provisions that pertain to fire apparatus access. These provisions include the design specifications for fire apparatus access roads, additional requirements for aerial fire apparatus access, and the requirements for the locations of fire apparatus access roads relative to buildings.

### 2.1 Fire Apparatus Access Roads

The Fire Code requires fire apparatus access roads to be a minimum of 20 feet in width.<sup>2</sup> The fire apparatus access roads, also known as fire lanes, for this Project consist of Ventura Blvd., Whitsett Avenue, Valleyheart Drive, an on-site fire lane along the northwest boundary of the Project adjacent to Building 4, and an on-site fire lane approximately in the center of the Project between Building 2 and Building 3 that connects with both Ventura Blvd. and Valleyheart Drive. **All the designated fire apparatus access roads meet the minimum width requirement of 20 feet.**

Where parallel parking is allowed on either side of a fire lane, the width of the fire lane is required to be increased by 8 feet for each parking lane.<sup>3</sup> Ventura Blvd., Whitsett Avenue, and Valleyheart Drive meet this requirement. Ventura Blvd. is 70 feet wide with parking allowed on both sides of the street, Whitsett Avenue is 64 feet wide with parking prohibited adjacent to the Project site, and Valleyheart Drive is 28 feet wide with parking limited to the east side of the street only. Parking is not proposed for either side of the on-site fire lanes. **All fire apparatus access roads meet the minimum width requirement when parking is allowed.**

Fire apparatus access roads are also required to have a clear vertical height of not less than 13 feet 6 inches.<sup>4</sup> All the fire apparatus access roads can achieve this required vertical clearance. Landscaping plans show proposed trees adjacent to the on-site fire lanes. The landscape architect is encouraged to coordinate with the fire department on the species and exact installation location of the trees to minimize encroachment of the tree canopies into the vertical clearance of the fire lanes. **Regular maintenance of the trees will be required to prevent tree canopy growth into the width and height specifications of the fire lanes.**

Fire apparatus access roads are required to have a surface that allows all-weather drivability.<sup>5</sup> Appendix D states that surfaces of fire lanes are to be asphalt, concrete, or other approved driving surface capable of supporting the

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<sup>2</sup> Los Angeles Fire Code Section 503.

<sup>3</sup> Los Angeles Fire Code Section 503.

<sup>4</sup> Ibid

<sup>5</sup> Ibid

imposed load of fire apparatus weighing up to 75,000 pounds.<sup>6</sup> The two on-site fire lanes are proposed to have a surface of turf block and artificial turf. Some fire departments consider turf block to be an alternative surface. **Specific approval from LAFD will be needed to use turf block with artificial turf as the surface for the on-site fire lanes.**

Dead-end fire apparatus access roads in excess of 150 feet in length are required to be provided with an approved turnaround.<sup>7</sup> Valleyheart Drive is currently identified as a dead-end road. However, the Project proposes to connect Valleyheart Drive with the two on-site fire lanes. Connecting Valleyheart Drive with the northwest fire lane creates through access for emergency vehicles. **None of the fire apparatus access roads are dead-end roads.**

## 2.2 Aerial Fire Apparatus Access

Where the vertical distance between the grade plane and the highest roof surface exceeds 30 feet, the Fire Code requires an approved aerial fire apparatus access road to be provided. As previously noted, the roofs of the residential buildings are approximately 71 feet above the grade plane. As such, the Project is required to provide conforming aerial fire apparatus access. An aerial fire apparatus access road is required to be a minimum of 28 feet in width.<sup>8</sup> Additionally, the aerial fire apparatus access road is required to have the edge nearest to the building located 15-30 feet from the building in order to allow for articulation of the aerial ladder and deployment with safe climbing angles.<sup>9</sup> Ventura Blvd. can serve as the required aerial fire apparatus access road. All buildings are set back approximately 21 feet from Ventura Blvd., which is within the 15-30-foot setback range required for an aerial fire apparatus access road. The 70-foot width of Ventura Blvd. exceeds the minimum 28-foot width requirement for an aerial fire apparatus access road. **Ventura Blvd. meets the requirements of an aerial fire apparatus access road for all of the buildings proposed by the Project.**

## 2.3 Proximity to Buildings

Approved fire apparatus access roads are required to be provided for every building. One or more fire apparatus access roads are required to extend to within 150 feet of all portions of the facility and all portions of the exterior walls of the first story of the building as measured by an approved route around the exterior of the building.<sup>10</sup> This is known as the hose pull requirement. Access to within 150 feet of all portions of the exterior walls of the first story ensures that firefighters are able to extend pre-connected hose lines completely around buildings. There is an exception that allows the fire code official to increase the maximum allowable distance when a structure is equipped with Fire Sprinklers, such as the Project.

A hose pull analysis was completed for this assessment. All portions of the exterior walls of the first story of all the proposed buildings are within 150 feet of a fire apparatus access road except for two small portions. There is a 17-foot gap in the courtyard of Building 2 and a 28-foot gap in the courtyard of Building 4. **It is anticipated that these hose pull gaps will be acceptable to LAFD given the various systems that will be included in this Project, specifically automatic fire sprinklers and standpipes, which allow the fire code official to grant the aforementioned determination.**

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<sup>6</sup> Los Angeles Fire Code Appendix D

<sup>7</sup> Los Angeles Fire Code Section 503

<sup>8</sup> Ibid

<sup>9</sup> Los Angeles Fire Code Appendix D

<sup>10</sup> Los Angeles Fire Code Section 503

## 3 Water Supply

Fire protection water supplies are required to be provided through a system of water sources, water mains, and fire hydrants that are capable of providing the required fire flow. Fire flow is typically based on the type of construction and the size of the building requiring fire protection. The Los Angeles Fire Code has water supply requirements based on the type of land development.

### 3.1 Fire Flow

The Project, while primarily residential, is located in an industrial and commercial land use zone. The City of Los Angeles Fire Code requires a fire flow of 6,000 to 9,000 gallons per minute (gpm) for industrial and commercial land use zones.<sup>11</sup> An *Information of Fire Flow Availability* report provided by the Los Angeles Department of Water and Power for the Project indicates that the water supply system can provide a total of 9,000 gpm at the Project site (*Attachment 1*). **Attachment 1 confirms that the required fire flow for the Project will be met by the Los Angeles Department of Water and Power.**

### 3.2 Fire Hydrants

In addition to providing 9,000 gallons of water per minute, the LAFD also requires the fire flow to be provided by a minimum of six project-adjacent fire hydrants all flowing water simultaneously.<sup>12</sup> The *Information of Fire Flow Availability* report identifies six existing fire hydrants on Ventura Blvd. between Whitsett Avenue and the northwest on-site fire lane adjacent to and across the street from the Project site. The fire flow report confirms that each fire hydrant can flow 1,500 gpm for a total of 9,000 gpm when all fire hydrants are flowing simultaneously. **The required number of fire hydrants currently exists within the proximity to the Project required by the LAFD.**

## 4 Defensible Space and Vegetation Management

As previously mentioned, the Project is located in a designated Very High Fire Hazard Severity Zone (VHFHSZ). As such, the Project is required to provide defensible space vegetation management that complies with LAFD requirements. For projects in urban areas surrounded by existing development, vegetative fuel management is generally accomplished through a landscaping plan that complies with defensible space fuel management zone (FMZ) requirements.

### 4.1 Fuel Management Zones

The LAFD requires 200 feet of managed vegetative fuel for projects located in a fire hazard severity zone. The distance is measured from the edges of buildings outward and is divided into two fuel management zones, each of which is 100 feet in width. The first 100 feet of vegetation fuel management is further divided into three zones. An ember-resistant zone is the first five feet adjacent to a structure. Zone A extends 5 to 30 feet from the structure and Zone B extends 30 to 100 feet from the structure.

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<sup>11</sup> Los Angeles Fire Code Section 507

<sup>12</sup> Ibid

The Project is infill and does not have any direct interface with wildland vegetative fuels. The nearest wildland area is approximately 1,500 feet from the Project adjacent to the low-density residential development to the south. As such, the 200 feet of vegetative fuel management for this Project is provided by adjacent land uses including urban development, residential development, and the Los Angeles River to the northeast of the Project site. The remaining consideration with regard to vegetative fuels is the landscaping for the Project.<sup>13</sup> Given the distance the Project is located from the Santa Monica Mountains and the natural vegetation in which wildfires typically occur, the Project site is not at risk of being affected by the flames of a wildfire. However, embers produced by a wildfire event could be carried by prevailing on-shore winds or seasonal off-shore winds to the Project site. Embers are the primary ignition source of wildfire-related ignitions in landscaping vegetation.<sup>14</sup>

## 4.2 Ground-Level Landscaping

In fire hazard severity zones, the LAFD requires “landscape vegetation, including, but not limited to conifers (e.g. cedar, cypress, fir, juniper, and pine), eucalyptus, acacia, palm, and pampas grass [to be maintained] in such a condition as not to provide an available fuel supply to augment the spread or intensity of a fire.”<sup>15</sup> In general, Chapter 49 of the Fire Code requires all new vegetation installed in a fire hazard severity zone to be fire-resistant.<sup>16</sup> The Fire Code provides several means of determining if plants, shrubs, and trees are classified as fire-resistant. The means include a book, journal, or listing, approved by the fire agency, that provides fire-resistance information about the species recommended for a climate zone; a report or finding, with justification, issued by a licensed landscape architect; or vegetation approved by and/or considered to be fire-resistant by the local fire agency.<sup>17</sup> Attachment 2 of this assessment contains the *Los Angeles City and County Plant Selection Guidelines by Zone* document. This information is provided to assist with determining which of the proposed plants, shrubs, and trees in the conceptual landscaping plans will be acceptable for landscaping in a fire hazard severity zone.

## 4.3 Rooftop Landscaping

In addition to ground-level landscaping, the Project proposes landscaping for the occupiable rooftops. The Fire Code does not specifically prohibit rooftop landscaping in fire hazard severity zones. Landscaping vegetation for rooftops is required to comply with defensible space vegetative fuel management provisions since the landscaping is within the designated fuel management zone for the building. As with ground-level landscaping, rooftop landscaping is required to be selected and maintained such that the landscaping does not provide an available fuel supply to augment the spread or intensity of a fire.

More specifically, the Fire Code limits rooftop landscaped areas to a maximum of 15,625 square feet with the longest side of the area not exceeding 125 feet. Multiple rooftop landscaped areas are required to be separated by at least 6 linear feet.<sup>18</sup> Rooftop landscaping is required to be provided with supplemental irrigation to ensure that plants remain hydrated sufficiently to remain healthy and minimize dry foliage. In keeping with the state’s

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<sup>13</sup> Los Angeles Fire Code Section 322

<sup>14</sup> National Fire Protection Association. 2025. *How Do Homes Burn in a Wildfire?* <https://www.nfpa.org/videos/how-do-homes-burn-in-a-wildfire>

<sup>15</sup> Los Angeles Fire Code Section 4906

<sup>16</sup> Ibid

<sup>17</sup> Ibid

<sup>18</sup> Los Angeles Fire Code. Section 317

requirement for an ember-resistant zone around structures, it is recommended that rooftop landscaping is not located within 5 feet of walls that extend above the occupiable and landscaped rooftop area.

## 4.4 Trees

Trees receive special consideration as part of the landscaping for projects in fire hazard severity zones. Trees are desirable in the urban environment to help reduce the heat island effect of development, to provide shade to help reduce the use of energy to cool buildings, and to improve quality of life.<sup>19</sup> In general, new fire-resistant trees installed in fire hazard severity zones are required to be planted such that the tree's drip line or canopy perimeter at maturity is at least 10 feet from buildings.

Trees that are not fire-resistant, such as conifers, palms, pepper trees, and eucalyptus species are required to be installed such that their drip lines or canopy perimeters at maturity are 30 feet from buildings. Given the siting and massing of the proposed buildings for this Project, there are very limited locations within the Project site that would accommodate non-fire-resistive trees whose drip lines will be 30 feet from the buildings at maturity. The LAFD gives special attention to palm trees given their known ignitability from airborne embers and their propensity for large volume and large size ember production once ignited. LAFD notes,

Many palm species are known to be receptive to embers and once ignited, difficult to extinguish. Poorly maintained palms present an even greater hazard in the amount of ember production as well as the size and distance they can travel during wind driven wildfires. Size of the embers can vary from small masses of fibers to entire fronds. What we have learned about the dangers of embers and the distance they can travel suggests we should avoid using palms in known fire hazard severity zones.<sup>20</sup>

The existing landscaping on the Project site includes numerous palm species. The Project proposes to retain many Mexican Fan Palm trees. According to the *Los Angeles City and County Plant Selection Guidelines by Zone* document, Mexican Fan Palm trees are not allowed in Fuel Modification Zone A, which is the zone that is 5 to 30 feet from a structure. With regard to palm trees, the LAFD offers the following guidance:

There are hundreds of palm species in cultivation, however, it is impractical to identify each one and their appropriate planting location. Fuel Modification Plan Checkers will evaluate each plan according to the Plant Selection Guidelines [Attachment 1] considering density and arrangement first, then species selection and location in relation to the structure second.<sup>21</sup>

## 4.5 Vegetation Management Summary

The landscaping plans prepared for the Project include a selection of trees and shrubs that are on the approved plant list that is included in the *Los Angeles City and County Plant Selection Guidelines by Zone* document. Trees selected can be located with regard to the buildings such that they meet the spacing and distance requirements for Zone A fuel modification. Shrubs selected provide a variety of options to comply with requirements for location, height, groupings, and spacing. Review of the landscaping plans by LAFD will provide the necessary guidance for

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<sup>19</sup> California ReLeaf. 2025. *Benefits of Urban Trees*. <https://californiareleaf.org/resources/benefits-of-trees/>

<sup>20</sup> LAFD. 2025. *Palms, Wildfires, and AB 3074*. <https://lafd.org/palms-and-wildfires-and-ab3074>

<sup>21</sup> LAFD. 2025. *Palms, Wildfires, and AB 3074*. <https://lafd.org/palms-and-wildfires-and-ab3074>

retention of existing trees; species and placement of new trees; and species, spacing, and grouping of shrubs. The Project is required to comply with LAFD's requirements through the plan review process.

## 5 Plans

Like many southern California fire agencies, LAFD will generally require a fire protection plan for projects located in a fire hazard severity zone per section 4903 of the LAFD. Fire protection plans are project-specific, comprehensive documents that review and analyze relevant fire protection and safety codes, regulations, and standards with the intent to describe and prescribe ways to minimize and mitigate potential for loss from a wildfire exposure. Fire protection plans generally include vegetative fuel modification plans and/or detailed landscaping plans. If desired, Dudek can prepare a comprehensive fire protection plan for the Project that thoroughly evaluates all wildfire related factors, including the emergency response capacities of nearby fire stations, along with the Project's compliance with all applicable codes, regulations, and standards.

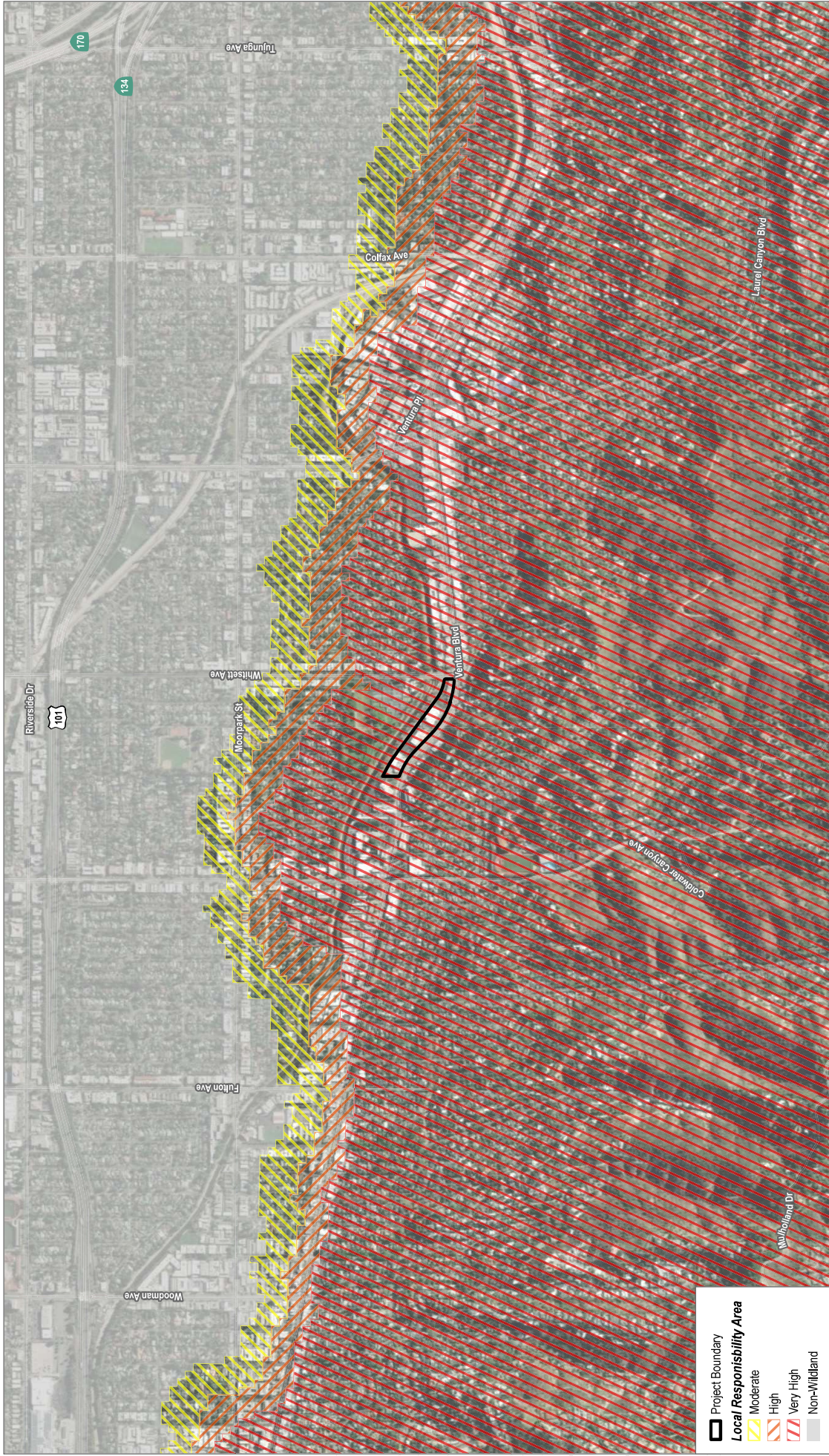
## Conclusion

The Riverwalk at Studio City project (Project) proposes to repurpose 6.01 acres on the northwest corner of Ventura Blvd. and Whitsett Avenue with a mixed-use development consisting of residential apartment units and commercial space that includes two-story restaurants and seven-story residential buildings built over subterranean parking. The construction types for the Project are Type 3 for the residential units over Type 1 for the garages. The Project is located in a California Department of Forestry and Fire Protection (CAL FIRE) designated Local Responsibility Area (LRA) Very High Fire Hazard Severity Zone (VHFHSZ).

As determined by the Los Angeles Department of Water and Power, the Project has the infrastructure to comply with water supply and fire flow requirements and substantially complies with fire apparatus access requirements. Approval of LAFD is needed to accept two small hose pull gaps and the surfacing of two on-site fire lanes with turf block and artificial turf. It is expected that the minor hose pull deficiencies will be approved.

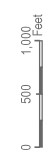
The 200 feet of defensible space required by the fact that the Project is in a designated fire hazard severity zone is provided by the existing adjacent urban development and the Los Angeles River. The Project includes both ground-level and rooftop landscaping, which is required to be approved by LAFD Fuel Modification Plan Checkers who evaluate each project independently based on site, hazard, and vegetation characteristics. An analysis of the proposed landscaping is included with this report. The palm species that are existing on the Project site and proposed to remain are limited to Fuel Modification Zone B. Some of the proposed new trees and shrubs have limitations with regard to fuel modification zone, proximity to structure, and height. The entirety of the trees and shrubs proposed for the Project will have to be reviewed and approved by the LAFD.

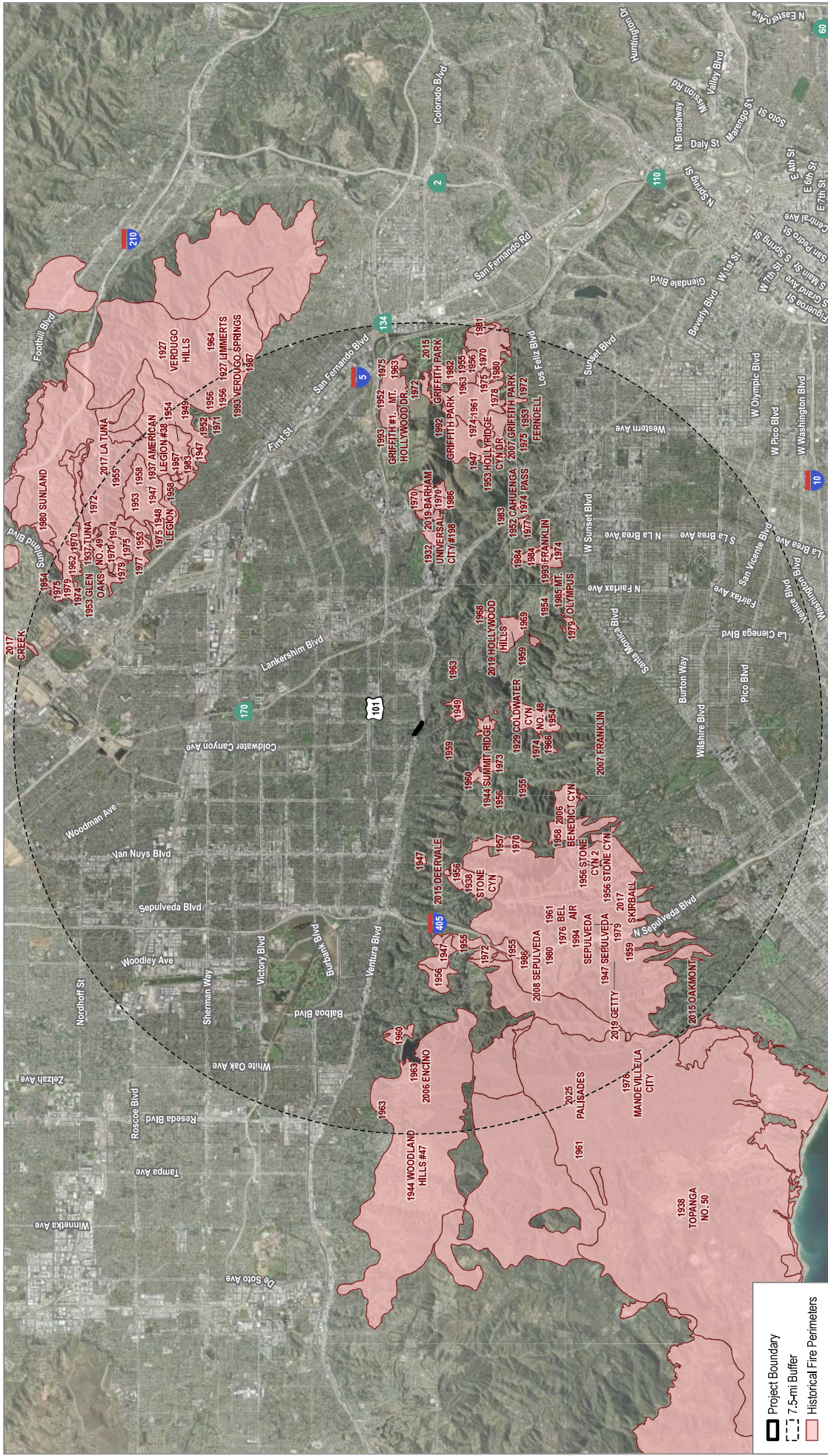
LAFD may require the submittal of a comprehensive fire protection plan for the Project. Should a fire protection plan be required, Dudek staff can complete a complying report.



**FIGURE 1**  
**Fire Hazard Severity Zones**  
 Riverwalk at Studio City

SOURCE: Esri World Imagery, CalFire 2025





**FIGURE 2**  
**Fire History**  
**Riverwalk at Studio City**

SOURCE: Esri, World Imagery, Open Street Maps 2019, CalFire 2025

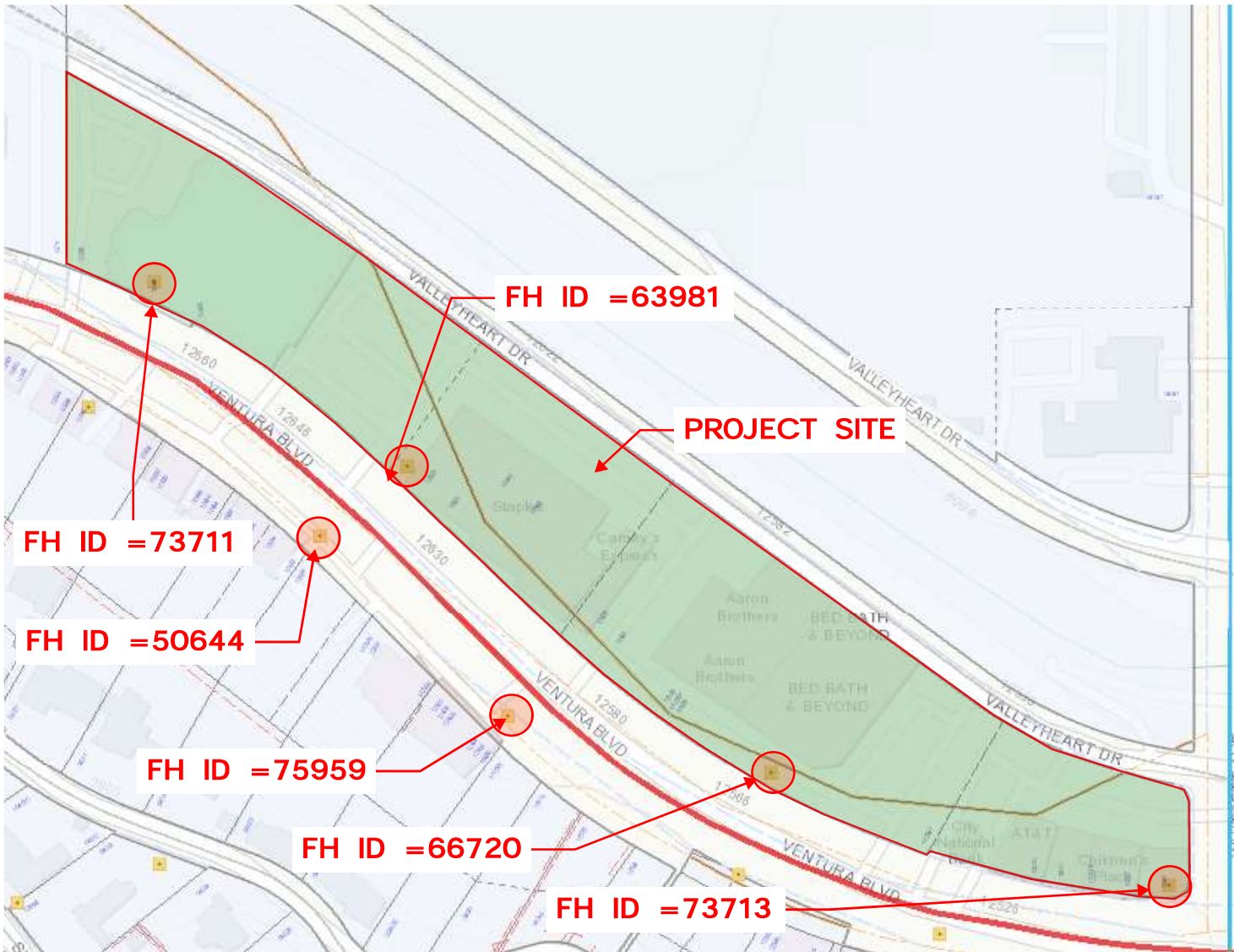






**TABLE 57.507.3.1  
FIRE-FLOW BY TYPE OF LAND DEVELOPMENT**

Type of Land Development	Fire-Flow in Gallons Per Minute
Low Density Residential	2,000 G.P.M. from three adjacent fire hydrants flowing simultaneously
High Density Residential and Neighborhood Commercial	4,000 G.P.M. from four adjacent fire hydrants flowing simultaneously
<b>Industrial and Commercial</b>	<b>6,000 to 9,000 G.P.M. from four to six fire hydrants flowing simultaneously</b>
High Density Industrial and Commercial (Principal Business Districts or Centers)	12,000 G.P.M. available to any block (where local conditions indicate that consideration must be given to simultaneous fires, and additional 2,000 to 8,000 G.P.M. will be required).



Fire Hydrants (DWP) Report	
Fire Hydrant ID	73713
WSM Number	164-165
PLR ID	96481
PLR report	1/1/1982
District	EV
Construction Date	1/1/1982
Date Reported	
Size Code	2 1/2 X 4D
Make Type	Clow
Street Name	VENTURA BL
Corner Side	NW
Cross Street	WHITSETT AV
Gate Section	
Main Size	12
Gate Valve	6.00
Outlet Size	6.00
Lateral Size	6.00
Lateral Length	
Lateral Material	
Distance From Main	
Ground Elevation	
Maximum Hydrant Grade	
Max Pressure	

Fire Hydrants (DWP) Report	
Fire Hydrant ID	66720
WSM Number	164-162
PLR ID	96481
PLR report	1/1/1982
District	EV
Construction Date	1/1/1982
Date Reported	
Size Code	2 1/2 X 4D
Make Type	Clow
Street Name	VENTURA BL
Corner Side	N
Cross Street	523 WCL WHITSETT AV
Gate Section	
Main Size	12
Gate Valve	6.00
Outlet Size	6.00
Lateral Size	6.00
Lateral Length	
Lateral Material	
Distance From Main	
Ground Elevation	
Maximum Hydrant Grade	
Max Pressure	

Fire Hydrants (DWP) Report	
Fire Hydrant ID	63981
WSM Number	164-162
PLR ID	96481
PLR report	1/1/1982
District	EV
Construction Date	1/1/1982
Date Reported	
Size Code	2 1/2 X 4D
Make Type	Clow
Street Name	VENTURA BL
Corner Side	N
Cross Street	404 ECL FAIRWAY AV
Gate Section	
Main Size	12
Gate Valve	6.00
Outlet Size	6.00
Lateral Size	6.00
Lateral Length	
Lateral Material	
Distance From Main	
Ground Elevation	
Maximum Hydrant Grade	
Max Pressure	

Fire Hydrants (DWP) Report	
Fire Hydrant ID	73711
WSM Number	164-162
PLR ID	96481
PLR report	1/1/1982
District	EV
Construction Date	1/1/1982
Date Reported	
Size Code	2 1/2 X 4D
Make Type	Clow
Street Name	VENTURA BL
Corner Side	N
Cross Street	91 ECL FAIRWAY AV
Gate Section	
Main Size	12
Gate Valve	6.00
Outlet Size	6.00
Lateral Size	6.00
Lateral Length	
Lateral Material	
Distance From Main	
Ground Elevation	
Maximum Hydrant Grade	
Max Pressure	

Report Window	
Results	Report
Fire Hydrants (DWP) Report	
Fire Hydrant ID	75959
WSM Number	164-162
PLR ID	102598
PLR report	11/9/1995
District	EV
Construction Date	11/9/1995
Date Reported	
Size Code	2 1/2 X 4D
Make Type	Clow
Street Name	VENTURA BLVD
Corner Side	S
Cross Street	855'ECL FAIRWAY AVE
Gate Section	165-162
Main Size	12
Gate Valve	6.00
Outlet Size	6.00
Lateral Size	6.00
Lateral Length	
Lateral Material	
Distance From Main	
Ground Elevation	
Maximum Hydrant Grade	
Max Pressure	

Report Window	
Results	Report
Fire Hydrants (DWP) Report	
Fire Hydrant ID	50844
WSM Number	164-162
PLR ID	102598
PLR report	11/9/1995
District	EV
Construction Date	11/9/1995
Date Reported	
Size Code	2 1/2 X 4D
Make Type	Clow
Street Name	VENTURA BLVD
Corner Side	S
Cross Street	357'ECL FAIRWAY AVE
Gate Section	165-162
Main Size	12
Gate Valve	6.00
Outlet Size	6.00
Lateral Size	6.00
Lateral Length	
Lateral Material	
Distance From Main	
Ground Elevation	
Maximum Hydrant Grade	
Max Pressure	

## **Plant Selection Guidelines by Zone**

Fuel Modification plant selection and location should focus on the density and arrangement of plants related to structures. Second, choose zone appropriate species based on plant characteristics such as moisture content, resin/pitch and the production of dead litter from leaves, bark, seed pods etc. The following guidelines are intended to simplify this process through zone specific compositions.

Zone A (30' from any qualifying structure or the property line whichever is first)

- Zone A should be planted “lean” and selections should consist of small herbaceous or succulent plants less than 2’-3’ in height or regularly irrigated and mowed lawns.
- It is best not to use woody trees, shrubs and perennial species or masses of un-mowed grasses within 10 feet of the structure.
- Occasional accents of woody plants can be used sparingly to soften hard edges of structures if the selections are widely spaced and zone appropriate.
- Consider locating hardscape features such as walkways, patios, driveways, sport courts etc. adjacent to the structure itself. Potted plants can be used to soften walls if necessary.

Zone B (30’-100’ from any qualifying structure)

- Zone B can be planted with a slightly higher density than Zone A. However, care should be taken not to create horizontal or vertical fuel ladders (see basic fire behavior graphics).
- Screen plantings can be used to hide unsightly views. Hedging is discouraged as it promotes the accumulation of dead litter inside the live hedge.
- Zone B is the ideal location to introduce larger shade trees provided they are zone appropriate and the canopies are not continuous.
- Avoid planting woody plant species larger than 3’ at maturity directly beneath any tree canopy.

Zone C (100’-200’ from any qualifying structure)

- Zone C often is not landscaped on many projects but is still subject to hazard reduction requirements (brush clearance). Do not denude the property.  
<http://www.readyforwildfire.org/>
- If Zone C is to be landscaped, avoid increasing plant density beyond guidelines for Zone B.

Adjacent to Access Roads

- Maintain Fire Access roads with a 20’ wide path that remains clear to the sky.

## Fuel Ladders/Basic Fire Behavior

Before selecting and locating plants on a Fuel Modification plan a basic understanding of wildland fire behavior is the key factor in properly arranging plants. Eliminating and avoiding the creation of fuel ladders should be the chief concern. Understanding that anything planted in the landscape can become receptive fuel for wildfire: the way it is arranged and maintained will greatly influence fire intensity. The following diagrams will aid in arranging plant compositions wisely.

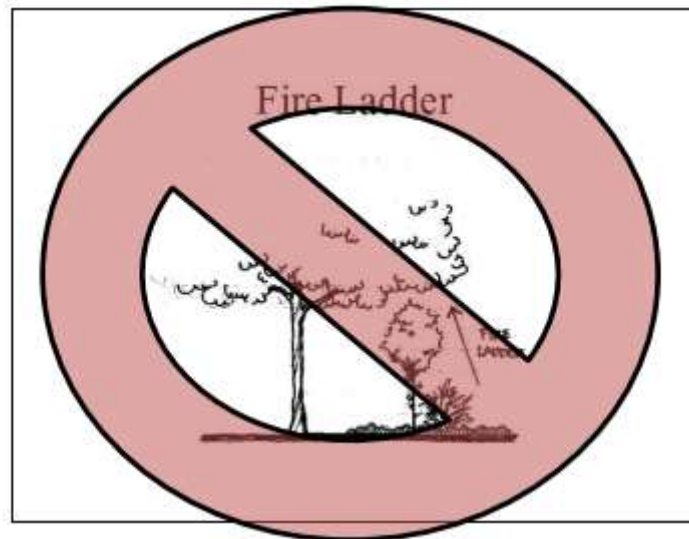


Figure 1: Fire Ladders or Fuel Ladders should be eliminated. The diagram above illustrates what not to do.



Figure 2: Eliminate the vertical and horizontal continuity. This is a good example of adequate separation.

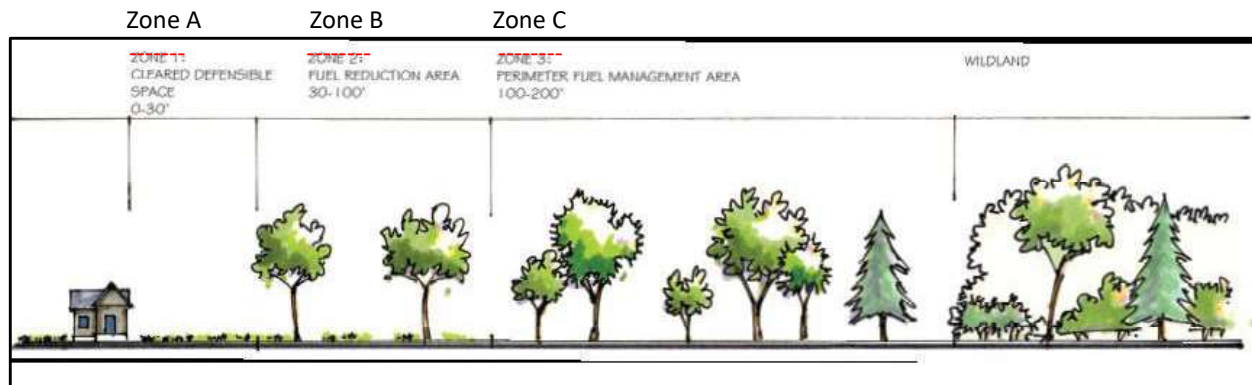


Figure 3: Note the progressive increase in density and arrangement moving away from the structure.

### Plant Placement Do's

- Do: use “mass plantings” or herbaceous/succulents as ground covers even if they are not traditionally used as such. Mass plantings if properly selected, can eliminate fuel ladders.
- Do: plant using spacing resulting in near complete coverage at maturity.
- Do: consider using patio trees as an informal screen in Zone A.
- Do: consider vines as an alternative to hedges on walls or fences 10' from structures.
- Do: select varieties of plants that are slower growing and reach manageable sizes at maturity.
- Do: use plants that are appropriately scaled to the size of the property and structure. A single story house does not need to be shaded by a 100' tall Sweetgum.

### Plant Placement Don'ts

- Don't plant hedges directly against structures. This includes espaliers of large shrubs not allowed in Zone A, or hedges taller than 6 feet or within 10' of the structure.
- Don't plant large shrubs and trees in continuous lines or large masses in Zones A or B.
- Don't plant at densities that result in an “instant landscape.”
- Don't plant large species and use pruning to reduce overall size.
- Don't plant vines on structures. Vines become receptive fuel beds for embers (fire brands).
- Don't assume any plant is “fire proof.” All plants will burn and assuming a plant is ignition resistant can be very misleading.
- Don't use large woody species in mass plantings.

### Acceptable Plant Selections for Fuel Modification

The provided plant list is intended as a representative sample of plants appropriate for each zone, considering size, moisture content, leaf litter production and chemical composition. This list is not comprehensive, and designers may choose plants not on the list if plant characteristics are zone appropriate. Selecting regionally appropriate plants considering climate and microclimate adaptability is the designer's responsibility.

### Undesirable Plants/Target Species

Plants listed below are not allowed as part of an approved Fuel Modification Plan. In addition to this list, designers should avoid planting known invasive plants such as Pampas grass and Hottentot Fig. If there are questions, please reference the California Invasive Plant Council.

<http://www.cal-ipc.org/>

\*This list is not inclusive and some cultivars (dwarf etc.) within the genus listed may be acceptable.

*Adenostoma fasciculatum* – Chamise

*Adenostoma sparsifolium* – Red Shank

*Artemisia californica* – California Sagebrush

*Eriogonum fasciculatum* – Common Buckwheat

*Cortaderia* spp. – Pampas Grass

*Cupressus* spp. – Cypress

*Eucalyptus* spp – Eucalyptus

*Jasminum humile* – Italian Jasmine

*Plumbago auriculata* – Cape Plumbago

*Tecoma capensis* – Cape Honeysuckle

Example plant selections by zone begin on the next page.

## Fuel Modification Plant List

Botanical Name	Common Name	Zone	Minimum distance from structure
<b>Ground Cover</b>			
Acacia redolens 'Desert Carpet'/'Low Boy'	Desert Carpet Acacia	B	30
Achillea tomentosa	Woolly Yarrow	A	
Ajuga reptans	Carpet Bugle	A	
Arctostaphylos (Prostrate Varieties)	Manzanita	B	
Artemisia californica (Cultivars)	Sagebrush - Prostrate Forms	B	30
Artemisia 'Powis Castle'	NCN	B	
Baccharis pilularis 'Pigeon Point'/'Twin Peaks'	Prostrate Coyote Brush	B	
Campanula poscharkyana	Serbian Bellflower	A	
Ceanothus gloriosus	Point Reyes Ceanothus	B	
Cerastium tomentosum	Snow-In-Summer	A	
Chamaemelum nobile	Chamomile	A	
Cistus salviifolius 'Prostratus'	Sageleaf Rockrose	B	
Coprosma kirkii	Mirror Plant	B	
Coreopsis auriculata 'Nana'	Tickseed	A	
Cotoneaster (Prostrate Varieties)	Cotoneaster	B	
Dalea greggii	Trailing Indigo Bush	B	
Delosperma alba	White Training Ice Plant	A	
Dichondra micrantha	Dichondra	A	
Drosanthemum floribundum	Rosea Ice Plant	A	
Duchesnea indica	Indian Mock Strawberry	A	
Dymondia margaretae	NCN	A	
Erigeron glaucus	Seaside Daisy	A	
E. karvinskianus	Santa Barbara Daisy	B	
Euonymus fortunei 'Colorata'	Purple-Leaf Winter Creeper	B	
Festuca cinerea(ovina'Glauca')	Blue Fescue	A	
F. rubra	Red Fescue	A	
Fragaria chiloensis	Wild Strawberry	A	
Gazania Hybrids	Trailing Gazania	A	
Geranium incanum/sanguineum	Cranesbill	A	
Glechoma hederacea	Ground Ivy	A	
Helianthemum nummularium	Sunrose	A	
Herniaria glabra	Green Carpet	A	
Heuchera species and Cultivars	Coral Bells	A	
Hypericum calycinum/coris	Aaron's Beard	B	
Iberis sempervirens	Evergreen Candytuft	A	
Iva hayesiana	Poverty Weed	B	30
Juniperus (Prostrate species/cultivars)		B	
Laurentia fluiatilis	Blue Star Creeper	A	
Lysimachia nummularia	Moneywort	A	
Liriope spicata	Creeping Lily Turf	A	

Liriope muscari	Lily Turf	A	
Mahonia repens	Creeping Mahonia	B	
Myoporum 'Pacificum' & 'Putah Creek'	Pacific Myoporum	B	
M. parvifolium	NCN	A	
Oenothera berlandieri	Mexican Evening Primrose	B	
O. stubbei	Baja Evening Primrose	A	
Ophiopogon japonicus	Mondo Grass	A	
Pachysandra terminalis	Japanese Spurge	A	
Pelargonium peltatum/tomentosum	Ivy Geranium	A	
Persicaria capitata	Pink Clover	A	
Phlox subulata	Moss Pink	A	10
Phyla nodiflora (Lippia repens)	Lippia	A	
Potentilla tabernaemontanii	Spring Cinquefoil	A	
Ribes viburnifolium	Catalina Perfume	B	
Rosmarinus officinalis (Prostrate Varieties)	Prostrate Rosemary	B	30
Scaevola 'Mauve Clusters'	NCN	A	
Salvia sonomensis	Creeping Sage	B	
Sedum species	Stonecrops	A	
Senecio mandraliscae/serpens	Kleinia/Blue Chalksticks	A	
Soleirolia soleirolii	Baby's Tears	A	
Teucrium cossonii majoricum	Germander	A	
T. X lucidrys 'Prostratum'	Prostrate Germander	A	
Thymus species	Mother of Thyme	A	
Trachelospermum jasminoides	Star Jasmine	A	
Trifolium fragiferum	White Clover	A	
Verbena species (Prostrate Varieties)	Garden Verbena	A	
Vinca minor	Dwarf Periwinkle	A	
Viola odorata	Sweet Violet	A	
Wedelia trilobata	Yellow Dot	B	
Zoysia tenuifolia	Korean Grass	A	
M r r r			
Acorous gramineous and Cultivars	Sweet Flag	A	
Agapanthus africanus	Lily of the Nile	A	
Alstroemeria cooperi	Peruvian Lily	A	
Armeria species	Thrifts	A	
Bamboos	Bamboo	B	30
Bergenia cordifolia	Heart Leaf Bergenia	A	
Cycas species	Cycads	A	
Cyrtomium falcatum	Holly Fern	A	
Davalia tricomanooides	Rabbits Foot Fern	A	
Epilobium canum	California Fuchsia	B	
Helictotrichon sempervirens	Blue Oat Grass	A	15
Hemerocallis hybrids	Daylily	A	
Iris douglassiana	Coastal Iris	A	
Iris germanica	Bearded Iris	A	

Kalanchoe species	Kalanchoe	A	
Leymus condensatus 'Canyon Prince'	Canyon Prince Wild Rye	B	
Lobelia laxiflora		A	10
Pelargonium species	Geranium	A	
Penstemon species	Beard Tongue	A	
Plumeria	Plumeria	A	
Phlebodium aureum	Rabbits Foot Fern	A	
Tulbaghia violacea	Society Garlic	A	
Zephyranthes candida	Zephyr Lily	A	
r			
Abelia grandiflora (Prostrata)	Glossy Abelia	A	10
Abutilon hybridum	Flowering Maple	A	10
Acanthus mollis	Bear's Breech	A	
Agave species	Agave	A	
Aloe species	Aloe	A	
Alyogyne huegelii	Blue Hibiscus	A	10
Arbutus unedo (Dwarf Cultivars)	Dwarf Strawberry Tree	A	10
Arctostaphylos species	Manzanita	B	
Aucuba japonica	Japanese Aucuba	A	
Baccharis species	Various	B	
Berberis thunbergii	Japanese Barberry	B	
B. thunbergii ' prostrate cultivars'		A	10
Bougainvillea sp.	Bougainvillea	B	
Buddleja davidii	Butterfly Bush	B	
Buxus microphylla japonica	Japanese Boxwood	A	10
Caesalpinia (Shrub Forms)	Bird of Paradise Bush	A	10
Camellia species	Camellia	A	10
Calliandra californica/erriophylla	Baja Fairy Duster	B	
Callistemon citrinus	Lemon Bottlebrush	B	
C. viminalis "Little John"	NCN	A	10
Calycanthus occidentalis	Western Spice Bush	B	
Carissa macrocarpa and Cultivars	Natal Plum	A	10
Carpenteria californica	Bush Anemone	A	10
Cassia artemisioides	Feathery Cassia	A	30
Ceanothus species	Wild Lilac	B	30
Cercocarpus betuloides	Mountain Mahogany	B	30
Choisya ternata	Mexican orange	B	
Cistus species	Rockrose	B	
Comarostaphylis diversifolia	Summer Holly	B	
Convolvulus cneorum	Bush Morning Glory	B	
Coprosma pumila/repens	Mirror Plant	B	
Cotoneaster species & cultivars	Cotoneaster	B	
Crassula species	NCN	A	
Cuphea hyssopifolia	False Heather	A	
Cycas revoluta	Sago Palm	A	

<i>Dasyilirion quadrangulatum/wheeleri</i>	Mexican Grass Tree	A	10
<i>Dendromecon harfordii</i>	Island Bush Poppy	B	
<i>Dietes bicolor/irioides</i>	Fortnight Lily	A	
<i>Dodonaea viscosa (Purpurea)</i>	Hopseed Bush	B	
<i>Elaeagnus pungens &amp; cultivars</i>	Silverberry	B	
<i>Encelia californica</i>	Coast Sunflower	A	10
<i>E. farinosa</i>	Brittle Bush	B	
<i>Erigonum giganteum</i>	St. Catherine's Lace	B	
<i>Escallonia species</i>	Escallonia	A	10
<i>Euonymus japonica &amp; cultivars</i>	Evergreen Euonymus	A	10
<i>Euphorbia species</i>		A	
<i>Euryops pectinatus</i>	NCN	A	
<i>Fatsia japonica</i>	Japanese Aralia	A	
<i>Fouquieria splendens</i>	Ocotillo	A	
<i>Fremontodendron species &amp; cultivars</i>	Flannel Bush	B	
<i>Gardenia jasminoides</i>	Gardenia	A	
<i>Garrya elliptica</i>	Coast Silktassel	B	
<i>Grevillea species &amp; cultivars</i>	Grevillea	B	
<i>Grewia occidentalis</i>	Lavender Starflower	B	
<i>Hakea suaveolens</i>	Sweet Hakea	B	
<i>Hebe species &amp; cultivars</i>	Hebe	A	10
<i>Hesperaloe parviflora</i>	Red Yucca	A	
<i>Hibiscus rosa - sinensis</i>	Chinese Hibiscus	A	10
<i>Ilex species</i>	Holly	B	
<i>Juniperus species</i>	Juniper	B	
<i>Justicia brandegeana</i>	Shrimp Plant	A	10
<i>J. californica</i>	Chuparosa	B	
<i>Keckiella cordifolia</i>	Heart-Leaved Penstemon	B	
<i>Kniphofia uvaria</i>	Red-Hot Poker	A	
<i>Lantana Camara &amp; hybrids</i>	Lantana	A	10
<i>Larrea tridentata</i>	Creosote Bush	B	
<i>Lavandula species</i>	Lavender	A	10
<i>Lavatera assurgentiflora/maritima</i>	California Tree Mallow	B	
<i>Leonotis leonrus</i>	Lion's Tail	B	
<i>Leptospermum scoparium &amp; varieties</i>	New Zealand Tea Tree	B	
<i>Leucophyllum species</i>		B	
<i>Ligustrum japonicum</i>	Wax-leaf Privet	A	10
<i>Lupinus species</i>	Lupine	B	
<i>Mahonia aquifolium ('Compacta')</i>	Oregon Grape	A	10
<i>M. fremontii</i>	Desert Mahonia	B	
<i>M. 'Golden Abundance'</i>	NCN	B	
<i>M. lomariifolia</i>	Venetian Blind Mahonia	A	
<i>Malosma - See Rhus</i>			
<i>Malva species</i>	Mallow	A	10
<i>Melaleuca nesophila</i>	Pink Melaleuca	A	10
<i>Mimulus species (Diplacus)</i>	Monkey Flower	A	10
<i>Myrica californica</i>	Pacific Wax Myrtle	B	

<i>Myrsine africana</i>	African Boxwood	A	10
<i>Myrtus communis</i> 'Compacta'	Dwarf Myrtle	A	10
<i>Nandina domestica</i> (including dwarf varieties)	Heavenly Bamboo	A	
<i>Nerium oleander</i>	Oleander	B	
N.o. 'Petite Salmon'	NCN	A	10
<i>Opuntia</i> species	Prickly Pear, Cholla etc.	A	
<i>Phlomis fruticosa</i>	Jerusalem Sage	A	
<i>Phoenix roebelenii</i>	Pygmy Date Palm	A	
<i>Phormium tenax</i> and Cultivars	New Zealand Flax	A	
<i>Photinia fraseri</i>	Photinia	B	
<i>Pittosporum tobira</i> ('Variegata')	Tobira	B	
P.t.'Wheeler's Dwarf'	Dwarf Pittosporum	A	
<i>Punica granatum</i> 'Nana'	Dwarf Pomegranate	A	10
<i>Prunus ilicifolia</i>	Hollyleaf Cherry	B	
<i>Pyracantha</i> species	Firethorn	B	
<i>Rhamnus californica/crocea</i>	Coffeeberry	B	
<i>Rhaphiolepis indica</i> and Cultivars	India Hawthorn	A	10
<i>Rhus integrifolia/laurina</i>	Lemonade Berry	B	40
R. ovata	Sugar Bush	B	30
<i>Ribes</i> species	Currant/Gooseberry	A	10
<i>Romneya coulteri</i>	Matilija Poppy	B	
<i>Rosa</i> species (except <i>R. californica</i> )	Rose	A	
<i>Rosmarinus officinalis</i> & cultivars	Rosemary	B	
<i>Salvia</i> species - native varieties	Sage	B	
S. greggii/leucantha	Autumn Sage	A	10
<i>Santolina chamaecyparissus/rosmarinifolius</i>	Lavender Cotton	A	10
<i>Simmondsia chinensis</i>	Jojoba	B	
<i>Strelitzia nicolai/regina</i>	Bird of Paradise	A	
<i>Tagetes lemmonii</i>	Copper Canyon Daisy	B	
<i>Tibouchina urvilleana</i>	Princess Flower	A	10
<i>Trichostema lanatum</i>	Wooly Blue Curls	B	
<i>Viburnum</i> species	Viburnum	A	10
<i>Westringia fruticosa</i>	Coast Rosemary	A	10
<i>Xylosma congestum</i>	Shiny Xylosma	B	
X.c. 'Compacta'	Compact Xylosma	A	10
<i>Yucca</i> species	Yucca	B	
r			
<i>Acacia farnesiana</i>	Sweet Acacia	A	15
A. greggii	Catclaw Acacia	B	
A. salicina	Willow Acacia	A	15
A. smallii	NCN	A	15
A. stenophylla	Shoestring Acacia	A	15
<i>Acer negundo</i>	Box Elder	B	
A. palmatum	Japanese Maple	A	
A. saccharinum	Silver Maple	B	30

<i>Aesculus californica</i>	California Buckeye	B	
<i>Agonis flexuosa</i>	Peppermint Tree	B	
<i>Albizia julibrissin</i>	Silk Tree	B	
<i>Alnus rhombifolia</i>	Alder	B	
<i>Arbutus unedo</i> ('Marina')	Strawberry Tree	A	15
<i>Archontophoenix cunninghamiana</i>	King Palm	A	
<i>Bauhinia variegata</i>	Purple Orchid Tree	B	
<i>Betula pendula</i>	European White Birch	A	10
<i>Brachychiton acerifolius/populneus</i>	Flame Tree/Bottle Tree	B	
<i>Brahea armata/edulis</i>	Blue Hesper Palm	A	10
<i>Butia capitata</i>	Pindo Palm	A	10
<i>Callistemon citrinus</i>	Lemon Bottlebrush	B	
<i>C. viminalis</i>	Weeping Bottlebrush	A	15
<i>Calocedrus decurrens</i>	Incense Cedar	B	
<i>Calodendrum capense</i>	Cape Chestnut	B	
<i>Cedrus deodara</i>	Deodar Cedar	B	30
<i>Ceratonia siliqua</i>	Carob	B	30
<i>Cercidium floridum/microphyllum</i>	Blue Palo Verde	A	
<i>Cercis occidentalis/canadensis</i>	Western Redbud	A	10
<i>Chamaerops humilis</i>	Mediterranean Fan Palm	A	10
<i>Chilopsis linearis</i>	Desert Willow	A	15
<i>Chionanthus retusus</i>	Chinese Fringe Tree	A	10
<i>Chitalpa X tashkentensis</i>	Chitalpa	A	10
<i>Chorisia speciosa</i>	Floss Silk Tree	B	
<i>Cinnamomum camphora</i>	Camphor Tree	B	30
<i>Citrus species</i>	Citrus	A	10
<i>Cocculus laurifolius</i>	Laurel Leaf Snail Seed	B	
<i>Cordyline australis</i>	Giant Dracaena	A	
<i>Cyathea cooperi</i>	Australian Tree Fern	A	
<i>Dicksonia antarctica</i>	Tazmanian Tree Fern	A	
<i>Dracaena draco</i>	Dragon Tree	A	
<i>Eriobotrya deflexa/japonica</i>	Bronze Loquat/Loquat	A	10
<i>Erythrina species</i>	Coral Tree	B	
<i>Feijoa sellowiana</i>	Pineapple Guava	A	10
<i>Ficus species</i>	Fig	B	50
<i>Fraxinus species</i>	Ash	B	30
<i>Geijera parviflora</i>	Australian Willow	A	15
<i>Ginkgo biloba</i>	Maidenhair Tree	A	15
<i>Gleditsia triacanthos</i>	Honey Locust	A	15
<i>Grevillea robusta</i>	Silk Oak	B	
<i>Heteromeles arbutifolia</i>	Toyon	A	15
<i>Hymenosporum flavum</i>	Sweetshade Tree	A	15
<i>Jacaranda mimosifolia</i>	Jacaranda	B	
<i>Juglans californica</i>	Black Walnut	B	
<i>Koelreuteria bipinnata/paniculata</i>	Chinese Flame Tree	B	
<i>Lagerstroemia indica</i>	Crape Myrtle	A	10
<i>Laurus nobilis</i>	Sweet Bay	B	

<i>Leptospermum laevigatum</i>	Australian Tea Tree	A	15
<i>Liquidambar formosana</i>	Chinese Sweet Gum	A	15
<i>L. styraciflua</i>	American Sweet Gum	B	
<i>Liriodendron tulipifera</i>	Tulip Tree	B	
<i>Lithocarpus densiflorus</i>	Tanbark Oak	B	
<i>Lophstemon confertus</i> (Tristania)	Brisbane Box	A	15
<i>Lyonothamnus floribundus</i>	Catalina Ironwood	A	15
<i>Magnolia grandiflora</i>	Southern Magnolia	B	
<i>M. X soulangeana</i>	Saucer Magnolia	A	10
<i>Maytenus boaria</i>	Mayten Tree	A	10
<i>Melaleuca quinquenervia</i>	Cajeput Tree	A	15
<i>Metasequoia glyptostroboides</i>	Dawn Redwood	A	15
<i>Metrosideros excelsus</i>	New Zealand Christmas Tree	A	10
<i>Morus alba</i>	White Mulberry	B	
<i>Olea europea</i>	Olive - Fruitless only	A	15
<i>Parkinsonia aculeata</i>	Jerusalem Thorn	A	10
<i>Phoenix dactylifera</i>	Date Palm	B	
<i>Pinus species</i>	Pine	B	75
<i>Pistacia chinensis</i>	Chinese Pistache	B	
<i>Pittosporum phillyraeoides</i>	Willow Pittosporum	A	10
<i>P. rhombifolium</i>	Queensland Pittosporum	B	
<i>Platanus racemosa</i>	California Sycamore	B	
<i>Podocarpus gracilior/macrophyllus</i>	Fern Pine/Yew Pine	B	
<i>Populus fremontii</i>	Fremont Cottonwood	B	
<i>Prosopis chilensis</i>	Chilean Mesquite	B	
<i>P. glandulosa</i>	Honey Mesquite	A	15
<i>Prunus cerasifera</i> 'Atropurpurea'	Purple-leaf Plum	A	10
<i>Punica granatum</i>	Pomegranate	B	
<i>Pyrus calleryana/kawakamii</i>	Ornamental Pear	A	15
<i>Quercus species</i>	Oak	B	30
<i>Rhus lancea</i>	African Sumac	B	
<i>Robinia ambigua</i>	Locust	B	
<i>Sapium sebiferum</i>	Chinese Tallow Tree	B	
<i>Schefflera actinophylla</i>	Queensland Umbrella Tree	A	
<i>Sophora japonica</i>	Japanese Pagoda Tree	B	
<i>Stenocarpus sinuatus</i>	Firewheel Tree	A	10
<i>Syagrus romanzoffianum</i>	Queen Palm	A	
<i>Tabebuia species</i>	Trumpet Tree	A	15
<i>Tipuana tipu</i>	Tipu Tree	B	
<i>Tupidanthus calypratus</i>	Tupidanthus	A	
<i>Trachycarpus fortunei</i>	Windmill Palm	A	
<i>Umbellularia californica</i>	California Bay	B	
<i>Washingtonia filifera</i>	California Fan Palm	B	30
<i>Zelkova serrata</i>	Sawleaf Zelkova	B	



# TECHNICAL REVIEW – WILDFIRE MANAGEMENT FEATURES

## Entitlement Level Documents

### Technical Engineering Review - CEQA/AB 130 Analysis

Codes and Standards Referenced in California Government Code Section 65913.4(a)(6)(D)

### Riverwalk at Studio City

### Los Angeles, California

6 May 2026 (Revised 29 May 2026)

### SGH Project 260494

#### PREPARED FOR

#### Studio City Sports Center, LLC

c/o Torino Companies  
4455 Wagon Trail Avenue  
Las Vegas, NV 89118

#### PREPARED BY

#### Simpson Gumpertz & Heger Inc.

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## EXECUTIVE SUMMARY

The Riverwalk at Studio City project (the “Project”) is a proposed 814-unit mixed-use redevelopment on a 5.99 acre constrained urban infill site at 12501–12555 West Ventura Boulevard within the City of Los Angeles Local Responsibility Area Very High Fire Hazard Severity Zone (VHFHSZ). The Project comprises three seven-story mixed-use buildings (Buildings 2, 3, and 4) over a four-level concrete podium, plus three two-story commercial buildings (Buildings 1-1, 1-2, and 1-3). The Project is being submitted under AB 130, which references the VHFHSZ carve-out at California Government Code Section 65913.4(a)(6)(D). This report is a technical engineering review supporting the City of Los Angeles's determination of AB 130 eligibility under that subdivision.

### Key Technical Findings

- **WUI Building Features:** Class A flat-roof/parapet, concrete podium underfloor enclosure, and predominantly noncombustible exterior cladding consistent with California Wildland-Urban Interface Code 2025, Part 7, Section 504. Composite-panel cladding products specified at construction document phase will satisfy ASTM E136, California Code of Regulations Title 19 Section 12-7A-1, or Office of the State Fire Marshal Building Materials Listing Category 8140.
- **Fire Access and Water Supply:** Four driveways onto two public streets with 20 ft fire lanes; Los Angeles Department of Water and Power *Information of Fire Flow Availability Report* (Appendix C, Exhibit C-3) supports the Los Angeles Fire Department-required 9,000 gpm fire flow (six public hydrants on Ventura Boulevard, 138–140 psi static, 116–118 psi residual at 1,500 gpm). Aerial fire apparatus access for the 84 ft Buildings 2, 3, and 4 will be detailed at construction document phase per 2026 Los Angeles Fire Code, Appendix D, Section D105.
- **Defensible Space:** Hardscape-dominant Zone 0, low-fuel-load Zone 1 (36,800 sq ft / 14% landscape with evapotranspiration-controlled irrigation), and noncombustible Zone 2 (paved streets, existing commercial development, concrete-channelized Los Angeles River) consistent with California Government Code Section 51182.
- **Tract Map Status:** Vesting Tentative Tract Map (VTT-84453) approved by the Advisory Agency subject to Bureau of Engineering and Los Angeles Fire Department conditions; under appeal to the Planning Commission. Discretionary entitlement applications scheduled for Planning Commission action on 11 June 2026.

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## **1. INTRODUCTION**

Simpson Gumpertz & Heger Inc. (SGH) has prepared this technical engineering review of the entitlement documents for the proposed Riverwalk at Studio City mixed-use development at 12501–12555 West Ventura Boulevard in Los Angeles, California (the “Project”). The purpose of this report is to provide the City of Los Angeles with technical findings on the wildfire mitigation features incorporated in the Project’s entitlement-level plans as those features relate to the technical content of the codes and standards referenced in California Government Code (CGC) Section 65913.4(a)(6)(D) to support the California Environmental Quality Act (CEQA) and Assembly Bill 130 (AB 130) analysis. This report is a technical review by a licensed fire protection engineer; legal interpretation of CGC Section 65913.4(a)(6)(D) and any AB 130 provisions is reserved to the City of Los Angeles.

### **1.1 Statutory Context**

California Public Resources Code (PRC) Section 21080.66, as established by AB 130 (effective 30 June 2025), provides a full statutory exemption from the provisions of CEQA for qualifying housing development projects that meet specified statutory criteria, including satisfying the locational requirements specified in CGC Section 65913.4(a)(6). One locational requirement identified by CGC Section 65913.4(a)(6)(D) would restrict application of this CEQA exemption if a site is located within a Very High Fire Hazard Severity Zone (VHFHSZ) or State Responsibility Area (SRA); however, this restriction does not apply if the site is subject to adopted fire hazard mitigation measures in three categories: (i) defensible space pursuant to PRC Section 4291 or CGC Section 51182; (ii) development fire safety standards pursuant to California PRC Section 4290 and its implementing regulations; and (iii) wildland-urban interface (WUI) building standards, currently contained in the California Wildland-Urban Interface Code (CWUIC) 2025, Part 7 (effective 1 January 2026), which replaced the legacy California Building Code (CBC), Chapter 7A. The technical content of those codes and standards is the subject of this technical review.

This report documents the wildfire mitigation features incorporated in the Project’s entitlement documents and identifies items to be specified, detailed, or cleared by the agency at the Construction Documents (CD) phase. This report is not a wildfire behavior analysis. It does not

model ember exposure, simulate fire spread, or field-verify site conditions. It does not provide legal opinions.

## **1.2 Scope and Approach**

Our review is limited to a desktop evaluation of the entitlement-level architectural, civil, landscape, and related documents made available to us, supplemented by reference to applicable wildfire science from the Insurance Institute for Business & Home Safety (IBHS), the National Institute of Standards and Technology (NIST), and the U.S. Department of Agriculture Forest Service (USFS), and to applicable Los Angeles Fire Department (LAFD) and Los Angeles Municipal Code (LAMC) requirements. The scope is consistent with our proposal BO26-0001102r-NBW dated 25 March 2026 (Revised), which is limited to a desktop review of the materials made available to us and does not include a site visit, destructive investigation, wildfire-spread or evacuation modeling, independent fire flow testing, product listing review, or testimony at hearings unless specifically requested as an additional service.

The documents reviewed for this report are entitlement-level drawings prepared for the Department of City Planning (DCP) application. They are not Los Angeles Department of Building and Safety (LADBS) stamped construction documents. Accordingly, this report identifies (a) wildfire mitigation features and design commitments visible in or made through the entitlement-level evidence and (b) items that will be developed, specified, or cleared by the agency at the CD phase. CD phase items are identified throughout the report and summarized in the Compliance Matrix (Section 8) and Appendix D.

The Project's vehicular access configuration—four driveways onto two public streets (Ventura Boulevard and Valleyheart Drive), with fire lanes at the eastern and western ends of the site—is documented in Section 6.2 of this report and provides multiple egress routes. Wildfire evacuation analysis is available from SGH as an additional service under separate authorization.

## **1.3 Background**

Per the Project entitlement materials, the Project is being submitted under the provisions of AB 130. Attachment A to the entitlement application states that the Project is proceeding under that statutory pathway. The Vesting Tentative Tract Map (VTT-84453) was approved by the

Advisory Agency subject to the conditions documented by the Bureau of Engineering and the LAFD. Those documents (Appendix C, Exhibits C-4 and C-1, C-2 respectively), together with the tract map drawing (Appendix I, Exhibit I-1), constitute the substantive tract map record available at the date of this report. The Advisory Agency action has been appealed to the Planning Commission. The Project's discretionary entitlement applications (Vesting Tentative Tract Map appeal, Density Bonus, Conditional Use Permit, and Project Review) are scheduled for Planning Commission action on 11 June 2026. The substantive tract map conditions and the tract map drawing are documented in Appendix I to this report.

As noted above, AB 130 incorporates the CGC Section 65913.4(a)(6)(D) VHFHSZ carve-out test for the purposes of determining eligibility for the PRC 21080.66 CEQA exemption. California PRC Section 21080.66 (the new AB 130 statutory CEQA exemption for infill housing, which incorporates the Section 65913.4(a)(6) parcel criteria by reference). CGC Section 65913.16 is the Affordable Housing on Faith and Higher Education Lands Act framework; it is referenced here only as a related statutory citation and applies on its own terms only to qualifying projects on faith or higher-education lands. For housing projects in a VHFHSZ, the carve-out language in CGC Section 65913.4(a)(6)(D) is the operative test under Sections 65913.4 and 21080.66 (directly and by incorporation, respectively). The City of Los Angeles has determined that the Project is eligible for AB 130's statutory CEQA exemption. Based on review of the entitlement-level documents identified in Section 2, the Project's design features comply with the wildfire mitigation measures referenced in CGC Section 65913.4(a)(6)(D); detailed product specifications, agency clearances, and construction-document verification will occur during the CD phase through the City of Los Angeles's standard LADBS and LAFD plan check and permitting workflow. Legal interpretation of which AB 130 provision the Project is relying on remains with the City of Los Angeles.

#### **1.4 Scope and Limitation of Engineering Opinion**

This report is a technical engineering review prepared by a licensed fire protection engineer. Based on review of the entitlement-level documents identified in Section 2, the Project's design features comply with the applicable wildfire mitigation measures under the codes and standards referenced in CGC Section 65913.4(a)(6)(D): CGC Section 51182 (defensible space), California

PRC Section 4290 (development fire safety standards), and the California Wildland-Urban Interface Code 2025, Part 7 (WUI building standards). Detailed product specifications, agency clearances, and construction document verification will occur during the CD phase through the City of Los Angeles's standard LADBS and LAFD plan check and permitting workflow, with compliance being a precondition to building permit issuance. Statutory interpretation remains with the City of Los Angeles. The findings in this report supplement the technical record supporting the City's determination of AB 130 eligibility.

## 2. DOCUMENTS REVIEWED

Our review was based on the following documents:

- 12555 Ventura Blvd – DCP Entitlement Application Submittal (Zoning Plans), prepared by MVE + Partners, Project No. 2019-10204, dated 9/18/2025. Sheet index A-0.0 through A-9.11 (approximately sixty sheets), including site plans, floor plans, elevations, building sections, unit plans, material board, and 3D views. Plans bear the City of Los Angeles Department of Building and Safety Preliminary Zoning Assessment Complete stamp (Megan Kolp, 09/23/2025, Application No. 25010-10000-01328).
- Landscape Entitlement Package, prepared by AO Architects (Diego Alessi, Lic. 4201), 22×34 format, Sheets L01 through L28.
- Attachment A – Requests for Discretionary Approvals and Vesting Tentative Tract Map (VTT-84453), prepared by Psomas, dated 24 September 2025.
- VTTM No. 84453 (PL-1TTM Draft, 2025-0605), prepared by Psomas.
- Phasing Exhibit (PL-1TTM01 Phase Exhibit, 25-0611, 11 June 2025) — see Appendix G, Exhibit G-2.
- Construction Phasing memorandum, prepared by the project owner (Torino Companies) — see Appendix G, Exhibit G-1.
- Vicinity Map, prepared by GC Mapping Service, Inc.
- Aerial Photo (Project Site: 12515–12665 W. Ventura Blvd).
- Photo Exhibit (12555 Ventura, dated 1/4/24).
- LAFD Inter-Departmental Correspondence — VTT-84453-HCA (12501 W. Ventura Blvd.) Fire Comments, dated 12 November 2025 — see Appendix C, Exhibit C-1.
- LAFD Inter-Departmental Correspondence — VTT-84453-HCA-REVISED (12501 W. Ventura Blvd.), dated 18 February 2026 — see Appendix C, Exhibit C-2.
- LADWP Information of Fire Flow Availability Report (IFFAR) for hydrants F-73713, F-66720, F-63981, F-73711, F-75959, F-50644, signed by Kimberly Haas, Civil Engineering Associate II, dated 29 April 2025 — see Appendix C, Exhibit C-3.
- Bureau of Engineering (BOE) Revised Report — Vesting Tentative Tract Map No. 84453, Hui Huang, Principal Civil Engineer, dated 29 January 2026 — see Appendix C, Exhibit C-4.

This engagement did not include a site visit, destructive or invasive investigation, wildfire modeling or simulation, independent fire flow calculations or testing, or testimony at hearings.

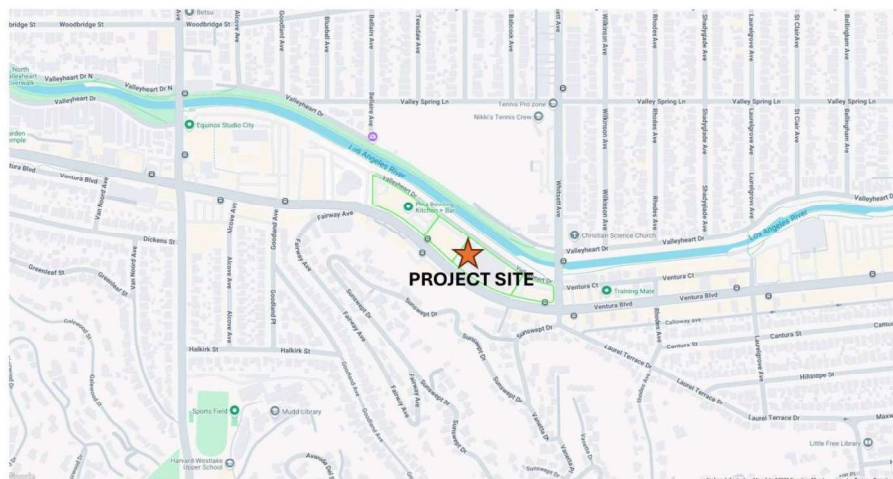
### 3. PROJECT DESCRIPTION

Based on the entitlement documents reviewed, the Project consists of the following:

- **Location.** 12501–12555 W. Ventura Boulevard, Los Angeles, California 91604 (Studio City). APNs 2375-018-008, 2375-018-013, 2375-018-018, and 2375-018-019. The site is located in the Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass Community Plan area and the Ventura/Cahuenga Boulevard Corridor Specific Plan.
- **Fire hazard designation.** VHFHSZ as designated by the City of Los Angeles within the Local Responsibility Area (LRA). The site is a constrained urban infill parcel on the valley floor along a major commercial corridor, bounded by Ventura Boulevard to the south, Valleyheart Drive to the north, Whitsett Avenue to the east, and the Los Angeles River corridor beyond Valleyheart Drive.
- **Site area.** Total lot area (pre-dedication) approximately 261,240 sq ft (5.99 acres); total lot area (post-dedication) approximately 248,138 sq ft. Zoning: C1.5-1VL-RIO (Limited Commercial, Very Limited Height, River Implementation Overlay District) with a Neighborhood Office Commercial General Plan Land Use designation (Figure 1).
- **Existing condition.** The properties are improved with one- and two-story commercial buildings and associated surface parking lots. Current uses include a bank (City National Bank), retail (Staples, Bed Bath & Beyond), restaurant (Carney's), and a bowling alley (Pinz Bowling Center). All existing structures will be demolished as part of the Project (Figure 2).
- **Proposed development.** Mixed-use redevelopment consisting of 814 residential apartment units (including 46 Very Low Income Affordable Units (7% of base density of 653 units per CGC Section 65915(f)(2), qualifying for a 25% State Density Bonus)) and approximately 75,968 sq ft of commercial uses (restaurant). The development includes:
  - Three seven-story, 84 ft mixed-use buildings (Buildings 2, 3, and 4) with residential units above ground-floor retail/restaurant and a shared subterranean parking podium.
  - Three two-story commercial buildings (Buildings 1-1, 1-2, and 1-3) ranging in size from approximately 8,506 sq ft to 21,102 sq ft (gross floor area, two-story), located at the eastern portion of the site along Whitsett Avenue (per Attachment A, Psomas, dated 9/24/2025).
  - Four levels of subterranean parking (P1 through P4) providing 1,806 total automobile parking spaces (1,040 residential + 766 commercial).
  - Approximately 89,738 sq ft of open space including two outdoor pools, courtyards, indoor recreation areas (12,966 sq ft), and 423 private balconies (21,105 sq ft).
  - Unit mix: 223 studios, 373 one-bedroom, 218 two-bedroom units across Buildings 2, 3, and 4.

- **Vehicular access.** Two driveways from Ventura Boulevard and two driveways from Valleyheart Drive. A new traffic signal is proposed on Ventura Boulevard at the main vehicular entrance. Fire lanes (20 ft minimum width) are shown at both the western and eastern ends of the site along the north property line (Valleyheart Drive frontage). Aerial fire apparatus access is addressed in Section 6.2.1.1.
- **Phased implementation.** The Project is proposed for two-phase construction under Vesting Tentative Tract Map No. 84453. Phase 1 includes Buildings 1, 2, and 3 (the eastern three buildings, fronting Ventura Boulevard). Phase 2 includes Building 4 (the western parcel). The interim site condition during Phase 1 construction is addressed in Section 6.3.5 and Appendix G.
- **Landscape.** Overall landscape area of 36,800 sq ft (14% coverage), per the updated landscape plans dated May 2026. The landscape design includes new tree plantings throughout the site. All existing on-site trees will be removed; twenty-eight existing street trees within the Ventura Boulevard public right-of-way will be protected in place during construction (see Section 6.3.2). A fully automatic underground irrigation system with evapotranspiration (ET) weather-based control will be provided.
- **Elevation.** Site elevations range from approximately 608 ft (at the Los Angeles River path level) to 628 ft (at the southwest Ventura Boulevard property line). The site is essentially flat with gentle grading toward the river (Figure 3).

**SITE : 12501-12665 W. VENTURA BLVD.**



**VICINITY MAP**



**Figure 1 – Vicinity Map**

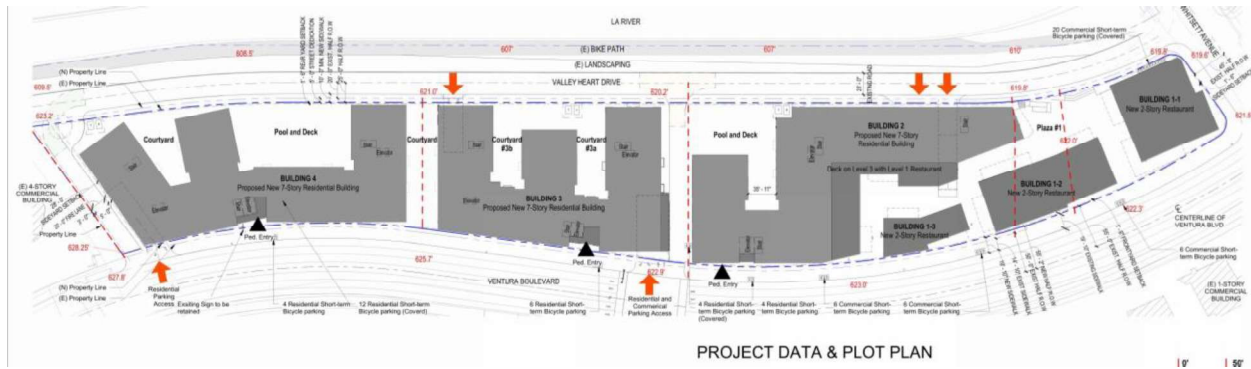
Site located on Ventura Boulevard between Whitsett Avenue and the Los Angeles River.  
(Source: GC Mapping Service)

AERIAL PHOTO  
Project Site: 12515-12665 W Ventura Blvd. Los Angeles, CA 91604  
Project Name: 12555 Ventura



**Figure 2 – Aerial Photograph of Existing Site Condition**

Project site outlined; existing one- and two-story commercial buildings and surface parking.  
(Source: Google Earth aerial; site outline by applicant)



**Figure 3 – Site Plan**  
**(Sheet A-0.3A — Project Data and Plot Plan, MVE + Partners, dated 9/18/2025)**

Master entitlement-level site plan showing all four primary buildings (with three commercial sub-buildings under Building 1), two driveways from Ventura Boulevard, two driveways from Valleyheart Drive, and fire lanes at the eastern and western ends of the site. Full-size sheet provided as Appendix C, Exhibit C-5.

## 4. REGULATORY FRAMEWORK

The following statutory and regulatory provisions identify the codes and standards that contain the technical wildfire mitigation requirements addressed in this report. This section identifies the controlling code edition and the local adoption pathway for each category, for technical reference. Statutory interpretation, including the legal effect of CGC Section 65913.4(a)(6)(D), is reserved to the City of Los Angeles.

### 4.1 CGC Section 65913.4(a)(6)(D) — Statutory Reference

As noted above, CGC Section 65913.4(a)(6) contains locational criteria that must be met for utilization of the AB 130 CEQA exemption, and Subdivision (a)(6)(D) of that section references three categories of fire-related codes and standards: (i) California PRC Section 4291 or CGC Section 51182 (defensible space); (ii) California PRC Section 4290 (development fire safety standards); and (iii) “Chapter 7A of the California Building Code, or other applicable standards” (ignition-resistant WUI construction). The technical content of those codes and standards is the subject of this technical review.

- **Technical relationship to the named statutory categories.** The Project site is located within the City of Los Angeles VHFHSZ (LRA). The Project’s entitlement-level documents incorporate wildfire mitigation features that relate to the technical content of each of the three categories named in CGC Section 65913.4(a)(6)(D): (i) defensible space features that align with CGC Section 51182, documented in the landscape entitlement package; (ii) site-level fire access, fire lane, and water supply features that align with California PRC Section 4290 and Title 14, California Code of Regulations, State Minimum Fire Safe Regulations; and (iii) WUI building features that align with CWUIC 2025, Part 7 (successor to CBC, Chapter 7A), with detailed product specification and agency clearance to occur at the construction document phase through the LADBS plan check process. Whether the Project’s features satisfy the legal requirements of CGC Section 65913.4(a)(6)(D) is reserved to the City of Los Angeles.

### 4.2 Code Edition Applicability

The entitlement documents bear a date of 18 September 2025. The 2025 edition of the California Building Standards Code (Title 24) became effective on 1 January 2026. Construction documents for this Project will be submitted for LADBS plan check after the effective date of the 2025 code cycle. The governing WUI building standards are accordingly those contained in CWUIC 2025 Part 7, as adopted and amended by the City of Los Angeles through LAMC

Article 7.1 (LAWUIC). The City's adoption is documented in the Los Angeles Board of Fire Commissioners report (November 2025) and implemented through LADBS supplemental plan check correction list PC.STR.Corr.Lst.116 (Rev. 2025-12-23).

#### **4.3 WUI Building Standards — CWUIC 2025, Part 7**

Applicable ignition-resistant construction requirements are contained in CWUIC 2025 Part 7, effective 1 January 2026, as adopted and amended by the City of Los Angeles. Key CWUIC requirements for structures in a VHFHSZ address Class A roof assemblies, ignition-resistant exterior walls, protected eaves and soffits, ember-resistant ventilation openings, tempered glazing, ignition-resistant decking, enclosed underfloor areas, roof-to-wall fire stopping, and trellis and appendage restrictions. Detailed VHFHSZ compliance notes and product specifications will be developed at the CD phase and verified through the LADBS plan check process. Appendix B provides a crosswalk from the legacy CBC Chapter 7A (2022) to CWUIC 2025 Part 7.

#### **4.4 California PRC Section 4290 and Title 14 Fire Safe Regulations**

California PRC Section 4290 establishes minimum fire safety standards for development in State Responsibility Area (SRA) lands, with implementing regulations in Title 14, California Code of Regulations (CCR), Division 1.5, Chapter 7, Subchapter 2 (State Minimum Fire Safe Regulations). The implementing regulations address four principal categories: emergency access (Title 14 CCR Section 1273); signage and building numbering (Title 14 CCR Section 1274); water supply and fire hydrants (Title 14 CCR Section 1275); and fuel modification, greenbelts, and building/parcel siting setbacks (Title 14 CCR Section 1276 series, including §1276.01 "Building and Parcel Siting and Setbacks"). Because the site is located in a City of Los Angeles LRA VHFHSZ, California PRC Section 4290 and the State Minimum Fire Safe Regulations are relevant to the Project's fire safety framework, subject to local regulations that equal or exceed the state minimums. The technical content of those provisions is also addressed because CGC Section 65913.4(a)(6)(D) references California PRC Section 4290 as one of the named categories of fire mitigation measures.

#### **4.5 California PRC Section 4291 and CGC Section 51182 — Defensible Space**

Because the Project site is within the City of Los Angeles LRA, CGC Section 51182 is the directly applicable defensible space statute. Following AB 3074 (2020) and SB 504 (2024), defensible space is organized into three zones: Zone 0 (0 to 5 ft, Ember-Resistant/Immediate Zone), Zone 1 (5 to 30 ft, Lean/Clean/Green Zone), and Zone 2 (30 to 100 ft, Reduced Fuel Zone). Zone 0 prescriptive requirements remain the subject of ongoing rulemaking by the Board of Forestry and Fire Protection (BOF) under Executive Order N-18-25; the Project commits to compliance with the prescriptive Zone 0 standard in effect at CD phase.

#### **4.6 LAFD, LAMC, and Los Angeles-Specific VHFHSZ Requirements**

The Los Angeles Building Code (LABC Sections 91.7203 and 91.7207) and the City's adoption of the California Wildland-Urban Interface Code 2025, Part 7 (codified in LAMC Chapter V, Article 7.1, LAWUIC) impose construction requirements for projects in the VHFHSZ, including Class A roofing, enclosed underfloor areas, ignition-resistant exterior walls, vent restrictions, tempered glazing, and ignition-resistant decking. The Los Angeles Fire Code (LAFC Section 57.4911) establishes the VHFHSZ zone and imposes use restrictions within that zone (including open-flame prohibition and restricted entry). Brush clearance obligations apply under LAMC Sections 57.4906.5.2 and 57.1.603.5 et seq. (200 ft maintenance zone). These requirements will be verified through the LADBS plan check process at the CD phase.

#### **4.7 Urban Infill Site Context**

The Project site presents a distinctly different wildfire mitigation context than a hillside or wildland-adjacent development. It is a 5.99 acre urban commercial parcel on the valley floor, surrounded by existing commercial development (including LAFD Fire Station 78 immediately east across Whitsett Avenue), paved streets, and the concrete-channelized Los Angeles River. The dominant exposure pathway at this site is structure-to-structure fire spread and ember transport from vegetated hillside areas south of Ventura Boulevard rather than direct wildland fire-front contact. The defensible space analysis in Section 6.3 is adapted to reflect this constrained urban infill context.

- **Site context.** As a descriptive matter, the Project replaces aging commercial buildings and surface parking with modern, code-compliant construction, which materially reduces the local structure-to-structure ignition risk relative to existing site conditions. This descriptive observation is offered as site context to inform interpretation of the technical analysis that follows. The technical findings in Section 6 and the Compliance Matrix in Section 8 document the Project's incorporation of the technical content of the named codes and standards directly. Questions of statutory interpretation are reserved to the City of Los Angeles.

## 5. WILDFIRE EXPOSURE AND IGNITION PATHWAYS

To provide appropriate context for evaluating the Project's wildfire mitigation features, this section summarizes the dominant structure ignition mechanisms in WUI fire events, drawing on research from the NIST, the IBHS, and the USFS.

### 5.1 Dominant WUI Structure Ignition Mechanisms

- **Ember (firebrand) accumulation.** Wind-borne embers are the principal driver of building ignitions in WUI fires. Embers can travel distances of one mile or more and accumulate in vulnerable building features including roof valleys, gutters, roof-to-wall intersections, and decking surfaces. For this urban infill site, ember transport from vegetated hillside areas south of Ventura Boulevard represents the primary wildfire exposure pathway.
- **Ember intrusion through building openings.** Embers enter structures through ventilation openings, gaps in building envelope assemblies, and failed or broken glazing. IBHS research has demonstrated that vent type, configuration, and orientation significantly affect ember entry.
- **Radiant heat and direct flame contact.** Combustible materials within the immediate vicinity of a structure can ignite from ember showers and expose the building to sustained radiant heat or direct flame contact. For multi-building urban sites, structure-to-structure fire spread is the more relevant consideration than direct wildland fire-front contact.

### 5.2 Site-Specific Exposure Assessment

The Riverwalk at Studio City site occupies a unique position in the wildfire exposure landscape. The hillside residential neighborhoods south of Ventura Boulevard are within the VHFHSZ, and the VHFHSZ boundary extends to include this valley-floor commercial corridor. The site's actual wildfire exposure profile is moderated by several factors:

- The site is separated from the nearest undeveloped wildland vegetation by Ventura Boulevard (an approximately 100 ft wide improved right-of-way), existing commercial development, and intervening urban fabric.
- The Los Angeles River (concrete-channelized) runs along the north boundary, providing a noncombustible buffer.
- LAFD Fire Station 78 is located immediately east of the site across Whitsett Avenue, providing proximate emergency response capability.

## 6. ANALYSIS AND FINDINGS

The following sections present our technical observations regarding the Project's entitlement documents as they relate to each applicable wildfire mitigation category. This analysis identifies design features and material selections that incorporate the technical requirements of the named codes and standards at the entitlement level and identifies items that will be specified at the CD phase.

### 6.1 Ignition-Resistant Construction (CWUIC 2025, Part 7)

The entitlement-level drawings do not include a dedicated VHFHSZ compliance note block (such notes are typically added at the CD phase during LADBS plan check). The material board (Sheet A-9.1), exterior elevations (Sheets A-2.1 through A-2.4), and building sections (Sheets A-3.1 through A-3.4) provide sufficient information for a preliminary component-by-component evaluation against CWUIC 2025, Part 7.

#### 6.1.1 Roof Coverings

- **Requirement.** Class A roof assembly; wood shakes and shingles prohibited in VHFHSZ (CWUIC 2025, Section 504.2).
- **Entitlement evidence.** Building sections (Sheets A-3.1 through A-3.4) show flat roof assemblies with parapets (top of parapet at approximately 703 ft). Elevations show no pitched roofing materials. Roof assemblies will be specified as Class A by tested and listed assembly per ASTM E108/UL 790; classification is established by the listed assembly, not by the roof slope.
- **CD phase item.** Specify Class A roof assembly per ASTM E108 or UL 790. Include roofing product International Code Council/Office of the State Fire Marshal (OSFM) research reports in the construction document package.

#### 6.1.2 Roof Gutters and Drainage

- **Requirement.** Gutter debris prevention (CWUIC 2025, Section 504.4).
- **Entitlement evidence.** Building sections show internal scupper drainage at parapet conditions rather than exposed exterior gutters. Internal drainage systems are inherently less vulnerable to ember accumulation than conventional exterior gutters. The parapet/scupper drainage design effectively addresses this requirement.

### 6.1.3 Ventilation Openings

- **Requirement.** Ember- and flame-resistant ventilation openings; no vents in eaves or cornices (CWUIC 2025, Section 504.10).
- **Entitlement evidence.** Ventilation details are not shown at the entitlement level. The flat roof, parapet wall geometry eliminates eave/cornice vents. Mechanical ventilation through the parking garage and common areas will be specified at the CD phase.
- **CD phase item.** Specify ember-resistant ventilation openings carrying OSFM Building Materials Listing (BML) Category 8165 or prescriptive code-compliant assemblies with 1/8 in. corrosion-resistant mesh. Confirm no vents are located in eaves or cornices. See Appendix D.

### 6.1.4 Eaves and Soffits

- **Requirement.** Protected eaves and soffits (CWUIC 2025, Section 504.3).
- **Entitlement evidence.** The building elevations show a flat roof, parapet wall design with no projecting eaves. The building envelope terminates at a parapet above the roof line, which eliminates the exposed eave/soffit vulnerability that is a primary ember intrusion pathway in conventional residential construction. No exposed eaves or soffits requiring protection are present in the entitlement-level design.

### 6.1.5 Exterior Walls and Cladding

- **Requirement.** Ignition-resistant or noncombustible exterior walls (CWUIC 2025, Section 504.5); wall coverings extending from foundation to roof.
- **Entitlement evidence.** The Material Board (Sheet A-9.1) and exterior elevations identify the following exterior cladding materials across the four primary buildings (Buildings 2, 3, and 4 residential/mixed-use; Building 1 with three commercial sub-buildings 1-1, 1-2, and 1-3):
  - Dark gray and white textured stucco. Noncombustible. Satisfies the CWUIC 2025 ignition-resistant exterior wall requirement through the prescriptive compliance pathway. Used on Buildings 2, 3, and 4.
  - Composite panel systems (light gray, dark gray, gray, white, silver, wood texture, wood slats, beaver tail pattern, custom patterns). Composite panel compliance depends on the specific product. Fiber cement composite panels are noncombustible per ASTM E136. Aluminum composite material (ACM), high-pressure laminate (HPL), and phenolic resin panels must be evaluated against CWUIC 2025, Section 504.5 either through OSFM BML Category 8140 or through prescriptive ignition-resistance testing under CCR Title 19, Section 12-7A-1.
  - White color tile, metal siding, wire mesh facade, white aluminum fins. Noncombustible. Satisfies CWUIC 2025.

- Storefront systems (glazing). Aluminum-framed storefront with glazing. Evaluated under glazing requirements (Section 6.1.6) rather than wall requirements.
- **Project design commitment.** Based on review of the entitlement-level documents, all composite panel cladding products specified at the CD phase will satisfy at least one of the following technical criteria: (i) ASTM E136 noncombustible classification; (ii) CCR Title 19, Section 12-7A-1 ignition-resistant classification; or (iii) OSFM BML Category 8140 listing. Product submittals demonstrating compliance with the chosen technical criterion will be provided to LADBS during plan check and maintained in the permanent project record. LADBS will not issue a building permit for a cladding assembly that does not comply with one of these criteria; enforcement through conditions of approval is administered by the City of Los Angeles.
- **Assembly-level fire performance — NFPA 285.** For multi-story exterior wall assemblies that include foam plastic insulation or other combustible components, NFPA 285 (Standard Fire Test Method for the Evaluation of Fire Propagation Characteristics of Exterior Wall Assemblies Containing Combustible Components) governs assembly-level fire performance. The applicability of NFPA 285 to the Project's exterior wall assemblies depends on the final wall construction selected at CD phase. For exterior wall assemblies subject to NFPA 285, the wall assembly will be specified to a tested and listed NFPA 285-compliant configuration.
- **Balcony assemblies.** The Project includes 423 private balconies. Balcony assemblies (deck surface, railings, underside, drainage) are a material ember-accumulation surface in WUI fire scenarios. Balcony decking, railings, and underside materials within 10 ft of the primary structure will be specified at the CD phase to satisfy CWUIC 2025, Section 504.7 (decking) and Section 504.5 (exterior walls), with attention to ember-accumulation pathways at deck-to-wall and rail-to-deck interfaces.

#### 6.1.6 Exterior Windows and Glazing

- **Requirement.** Tempered or fire-rated glazing (CWUIC 2025, Section 504.8).
- **Entitlement evidence.** Elevations show extensive glazing on all buildings, including residential windows, balcony doors, and ground-floor storefront systems. Window and door schedules with material specifications are not included in the entitlement package (these are CD phase documents).
- **CD phase item.** Specify all exterior glazing as insulating glass units with a minimum of one tempered pane, glass-block units, or fire resistance rated assemblies of not less than 20 min. Include window and door schedules with OSFM BML Category 8120 listing or prescriptive compliance documentation.

#### 6.1.7 Exterior Door Assemblies

- **Requirement.** Fire-resistant exterior doors (CWUIC 2025, Section 504.9).

- **Entitlement evidence.** Exterior door assemblies are not detailed at the entitlement level.
- **CD phase item.** Specify exterior door assemblies meeting CCR Title 19, Section 12-7A-1, OSFM BML Category 8150, or solid-core wood with stiles and rails not less than 1-3/8 in. thick. Include door schedule in construction documents.

#### 6.1.8 Garage Doors

- **Requirement.** Garage door assemblies serving enclosed parking structures in VHFHSZ must comply with CWUIC 2025, Section 504.9.1. Vehicular access doors to parking garages must be self-closing or automatic-closing, and door materials must be noncombustible, fire-rated, or listed under CCR Title 19, Section 12-7A-1.
- **Entitlement evidence.** Parking plans (Sheets A-1.22B/C through A-1.24C) show four levels of subterranean parking accessed through driveway ramps at Ventura Boulevard and Valleyheart Drive. Garage door assemblies and security gate configurations are not detailed at the entitlement level.
- **CD phase item.** Specify garage door assemblies at all vehicular access points to the subterranean parking structure. Doors must be noncombustible or fire-rated, self-closing or automatic-closing, and weather-stripped to limit ember intrusion. Include garage door specifications with OSFM BML Category 8150 listing or prescriptive compliance documentation.

#### 6.1.9 Decking and Balconies

- **Requirement.** Ignition-resistant decking within 10 ft of the primary structure (CWUIC 2025, Section 504.7).
- **Entitlement evidence.** The plans show pool decks and courtyard areas at Levels 1 and 2 (Sheets A-0.4A through A-0.4B) and 423 private balconies. Building sections show concrete podium decks for the courtyard/pool areas (noncombustible). The landscape residential enlargement (Sheet L09) identifies a “faux wood paving deck” at the pool deck area, which requires product-specific verification for CWUIC 2025 compliance.
- **CD phase item.** Specify balcony decking and railing materials for CWUIC 2025 compliance. Confirm the “faux wood paving deck” at the pool area is a noncombustible or ignition-resistant product (OSFM BML Category 8110 or CCR Title 19, Section 12-7A-2) and not a combustible wood-plastic composite. Verify ignition-resistant or noncombustible construction for balcony deck surfaces within 10 ft of the building.

#### 6.1.10 Cantilevered Projections

- **Requirement.** Enclosed or ignition-resistant undersides of projections (CWUIC 2025, Section 504.7).

- **Entitlement evidence.** Building elevations show balconies projecting from the building face. The undersides of these projections will require ignition-resistant treatment.
- **CD phase item.** Detail underside of all cantilevered balconies and projections with noncombustible or ignition-resistant materials maintaining the integrity of the exterior wall assembly.

#### 6.1.11 Underfloor Enclosure

- **Requirement.** Complete underfloor enclosure (CWUIC 2025, Section 504.6).
- **Entitlement evidence.** Building sections show the residential levels above a concrete parking podium structure with four subterranean levels. There are no exposed underfloor areas; the entire building base is enclosed within the concrete subterranean parking structure. The concrete podium design satisfies the technical underfloor enclosure requirement.

#### 6.1.12 Roof-to-Wall Firestopping

- **Requirement.** Firestopping at roof covering and roof decking intersection (CWUIC 2025, Section 504.2.2).
- **Entitlement evidence.** The parapet design shown on the building sections provides a continuous barrier above the roof line, addressing the roof-to-wall intersection.
- **CD phase item.** Include firestopping details at the roof-to-parapet wall intersection in construction documents.

#### 6.1.13 Trellis and Shading Structures

- **Requirement.** Combustible trellis restrictions in VHFHSZ. LADBS Information Bulletin P/BC 2023-023 (titled "Fire-Retardant Roof Cover," effective 1 January 2023) addresses VHFHSZ requirements that include combustibles trellis, deck, and roof restrictions, citing Los Angeles Building Code Section 710A and Los Angeles Residential Code Section R337.5. The bulletin may be reissued under the 2025 cycle; the current bulletin will be confirmed at CD phase.
- **Entitlement evidence.** Building 1 elevations (Sheet A-2.1) show an open trellis shading structure on the commercial buildings. 3D views (Sheets A-9.3 and A-9.4) show pergola/trellis structures in the courtyard areas between buildings.
- **CD phase item.** Specify all trellis and shading structures within 10 ft of the primary structure as noncombustible or heavy timber construction per the current LADBS Information Bulletin. Trellis structures beyond 10 ft will be heavy timber or noncombustible with minimum 4 in. spacing between members. Document compliance on construction drawings.

## 6.2 Fire Apparatus Access and Infrastructure (California PRC Section 4290/Title 14)

Title 14, CCR, Division 1.5, Chapter 7, Subchapter 2 (State Minimum Fire Safe Regulations) implements California PRC Section 4290 and establishes specific standards for emergency access, signage, water supply, and vegetation modification. Local LAFD requirements are documented in the LAFD Inter-Departmental Correspondence for VTT-84453-HCA dated 12 November 2025 and VTT-84453-HCA-REVISED dated 18 February 2026 (Appendix C, Exhibits C-1 and C-2).

### 6.2.1 Emergency Access

- **Requirement.** Roads providing safe access for emergency wildfire equipment and concurrent civilian evacuation, with minimum road width, grade, and turnaround/dead-end provisions per Title 14, CCR, Sections 1273.00 through 1273.08; and LAFD fire lane requirements per the LAFD comment letter (Appendix C, Exhibits C-1 and C-2).
- **Entitlement evidence.** The site plan and building sections show:
  - Four vehicular access points: two driveways from Ventura Boulevard and two from Valleyheart Drive, providing through-site access and eliminating dead-end road concerns.
  - Fire lanes (20 ft minimum clear width) at both the western and eastern ends of the site along the Valleyheart Drive frontage (Sections A-3.2 through A-3.4). The landscape plans (Sheets L09 through L10) indicate the fire access lanes use turf block/artificial turf surface with 6 ft vehicular double gates at the secured access points.
  - Ventura Boulevard provides arterial access from multiple directions; Valleyheart Drive provides secondary access along the north property line.
  - The site is essentially flat (elevations 608 to 628 ft), well within both the 16% maximum grade in Title 14 and the 10% maximum grade in the LAFD comment letter.
  - A new traffic signal is proposed at the main Ventura Boulevard entrance, improving emergency vehicle access and egress flow management.
- **Observation.** The multi-access urban site design with four vehicular entry/exit points, fire lanes on both ends, and connections to a major arterial (Ventura Boulevard) incorporates the technical access provisions described in Title 14, CCR, Section 1273. The LAFD Hydrants and Access Unit review and approval will be obtained at the CD phase.
- **CD phase item.** Confirm that the turf block/artificial turf fire access lane surfacing provides an all-weather driving surface rated for fire apparatus loading per Title 14 CCR Section 1273.01. Coordinate fire lane gate specifications (6 ft vehicular double gates at

secured access points) with LAFD for emergency access provisions, including a Knox Box rapid entry system per LAFD Fire Prevention Bureau Requirement No. 75. Gates on fire access lanes must be operable by LAFD and must not impede apparatus response. Electric gates, where used, must be tested and approved by LAFD prior to LADBS issuance of a Certificate of Occupancy.

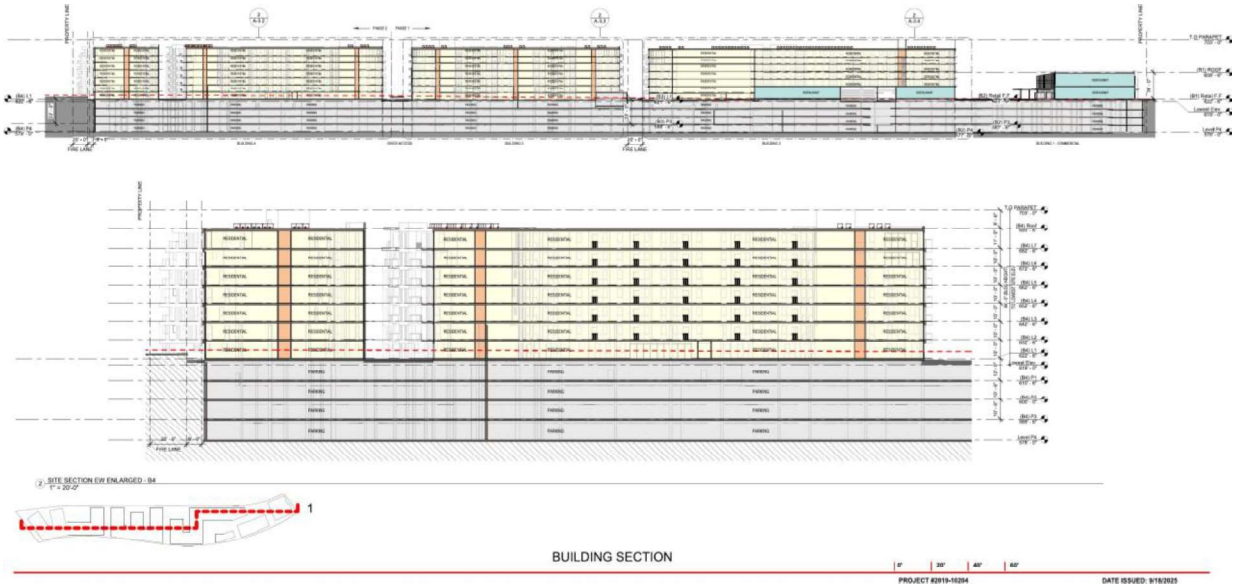
#### 6.2.1.1 Aerial Fire Apparatus Access

- **Requirement.** Where the vertical distance between the grade plane and the highest roof surface exceeds 30 ft, approved aerial fire apparatus access roads are required (2026 LAFC, Appendix D, Section D105; LAFD comment letter, Appendix C, Exhibits C-1 and C-2). The aerial fire apparatus access road must accommodate the aerial apparatus operating envelope. 2026 LAFC, Section D105.2 establishes a minimum 26 ft unobstructed width at the aerial setup location. The LAFD comment letter establishes a 28 ft minimum width where fire hydrants or aerial apparatus operating positions are located along the access road.
- **Applicability.** Buildings 2, 3, and 4 are seven-story mixed-use structures with a stated height of 84 ft to the highest roof surface. Each exceeds the 30 ft threshold and requires approved aerial fire apparatus access. Buildings 1-1, 1-2, and 1-3 are two-story commercial buildings and do not trigger the aerial access requirement.
- **Entitlement evidence.** The site plan shows fire lanes at both the western and eastern ends of the site along the Valleyheart Drive frontage and frontage along Ventura Boulevard, an approximately 100 ft wide improved right-of-way (Figure 4). The 20 ft fire lanes shown on the entitlement plans satisfy the general fire apparatus access width per Title 14 CCR Section 1273.01 but do not, on their face, demonstrate the 26 to 28 ft of unobstructed width required at the aerial setup positions. Aerial setup is accommodated within the Ventura Boulevard public right-of-way, an approximately 100 ft improved right-of-way that comfortably exceeds the 26 to 28-ft setup width. For aerial setup positions intended to operate from the Valleyheart Drive frontage, localized widening of the 20 ft on-site fire lanes to 26 to 28 ft at the aerial setup locations will be detailed at the construction document phase.

Figure 4 shows Section through Buildings 2, 3, and 4 with seven-story residential construction over the concrete podium subterranean parking garage, top of parapet at approximately 703 ft, and grade plane at approximately 619 ft (vertical distance approximately 84 ft, exceeding the 30 ft threshold for aerial fire apparatus access under 2026 LAFC, Appendix D, Section D105).

- **CD phase item.** Identify the aerial fire apparatus access road and the aerial setup positions for each of Buildings 2, 3, and 4 on the construction document plot plan submitted to the LAFD Hydrants and Access Unit. Provide a minimum 26 ft unobstructed width at the aerial setup location, increased to 28 ft where fire hydrants or aerial apparatus operating positions are located along the access road. Provide a

load-bearing surface rated for fire apparatus loading per Title 14, CCR Section 1273.01. Document the analysis in Appendix C to this report at the CD phase update.



**Figure 4 – Building Section (Sheet A-3.2, MVE + Partners)**

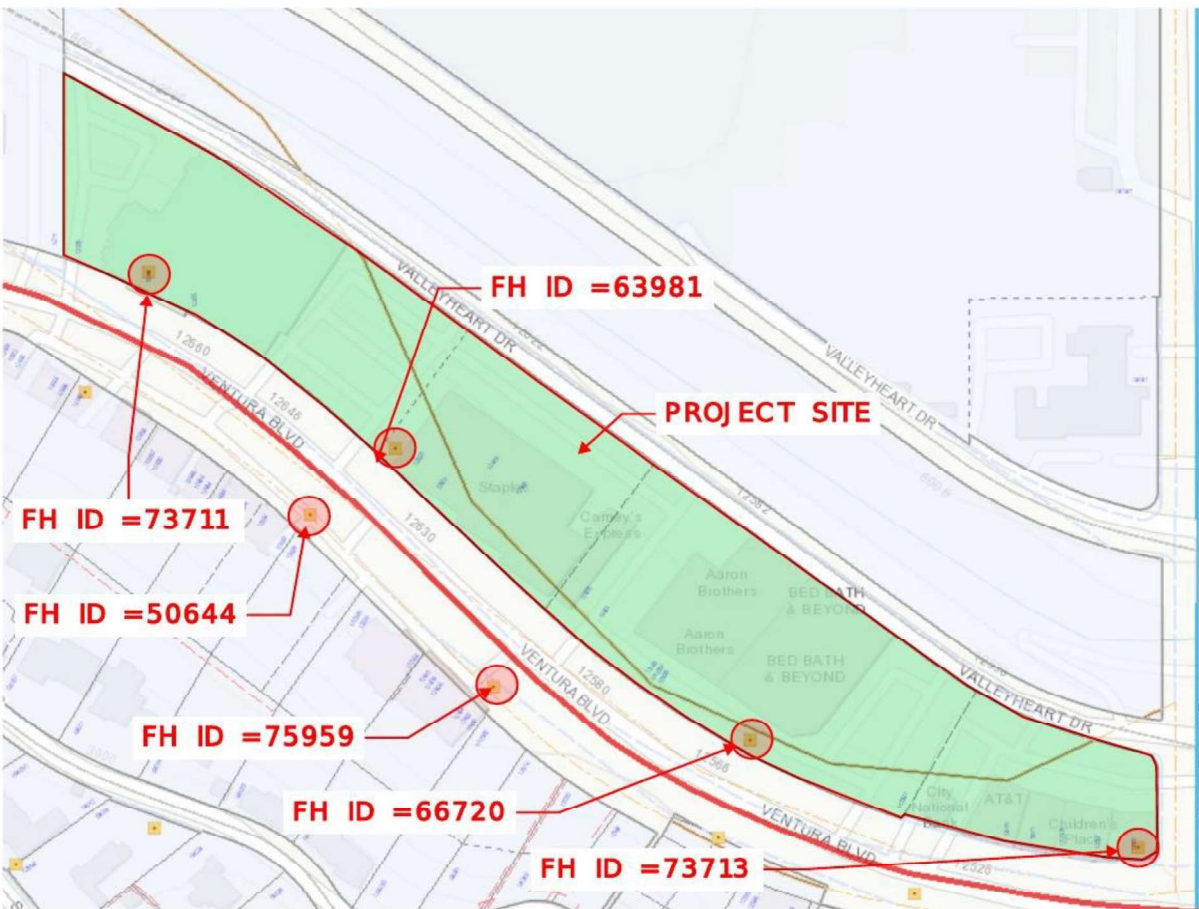
**6.2.2 Water Supply and Fire Hydrants**

- **Requirement.** Emergency water supply and fire hydrant access per Title 14, CCR, Section 1275 (State Minimum Fire Safe Regulations) and the LAFD comment letter.
- **Entitlement evidence — LADWP Information of Fire Flow Availability Report.** The site is served by the Los Angeles Department of Water and Power (LADWP) municipal water system. LADWP issued an Information of Fire Flow Availability Report (IFFAR) for the Project, signed by Kimberly Haas, Civil Engineering Associate II, on 29 April 2025 (Figure 5). The IFFAR is provided as Appendix C, Exhibit C-3, and documents the following:
  - LAFD fire flow requirement: 9,000 gpm with six hydrants flowing simultaneously, with a four-hydrant sensitivity scenario annotated (run a scenario for four hydrants flowing simultaneously at 9,000 gpm).
  - Six existing public fire hydrants on Ventura Boulevard within the Project’s hydrant coverage area: F-73713 (northwest corner of Ventura Boulevard and Whitsett Avenue), F-66720 (north side of Ventura, 500 ft west of Whitsett centerline), F-63981 (north side of Ventura, 900 ft west of Whitsett centerline), F-73711 (north side of Ventura, 1,444 ft west of Whitsett centerline), F-75959 (south side of Ventura, 830 ft west of Whitsett centerline), and F-50644 (south side of Ventura, 1,125 ft west of Whitsett centerline).
    - Hydrant size: 2-1/2 × 4D fittings
    - Water main: 12 in.
    - Static pressure: 138 to 140 psi

- Residual pressure at 1,500 gpm flow: 116 to 118 psi
- **Observation.** The fire flow infrastructure documented in the IFFAR meets the technical requirements of Title 14, CCR, Section 1275 for water supply at the entitlement level. The LADWP IFFAR supports the LAFD 9,000 gpm fire flow requirement at the entitlement/project-record level. Final fire service hydraulic design verification, including fire pump sizing, fire department connection (FDC), and on-site hydrant calculations, will occur during the NFPA 13 sprinkler design-build permitting process. The Compliance Matrix in Section 8 reflects an Incorporated status for water supply at the entitlement level on this basis.
- **CD phase item.** During NFPA 13 sprinkler design-build permitting, the sprinkler engineer of record will perform hydraulic calculations using the IFFAR pressures and verify fire flow adequacy at the FDC and on-site hydrant locations. LAFD Hydrants and Access Unit approval will be obtained through the standard plan check process. The four-hydrant sensitivity scenario annotated on the IFFAR will be confirmed as a robustness check during sprinkler design.

**TABLE 57.507.3.1  
FIRE-FLOW BY TYPE OF LAND DEVELOPMENT**

Type of Land Development	Fire-Flow in Gallons Per Minute
Low Density Residential	2,000 G.P.M. from three adjacent fire hydrants flowing simultaneously
High Density Residential and Neighborhood Commercial	4,000 G.P.M. from four adjacent fire hydrants flowing simultaneously
Industrial and Commercial	6,000 to 9,000 G.P.M. from four to six fire hydrants flowing simultaneously
High Density Industrial and Commercial (Principal Business Districts or Centers)	12,000 G.P.M. available to any block (where local conditions indicate that consideration must be given to simultaneous fires, and additional 2,000 to 8,000 G.P.M. will be required).



 POTENTIAL FIRE HYDRANTS

**Figure 5 – Fire Hydrant Location Map  
(LADWP IFFAR, signed by Kimberly Haas 29 April 2025)**

Six existing public fire hydrants on Ventura Boulevard within the project hydrant coverage area (F-73713, F-66720, F-63981, F-73711, F-75959, and F-50644). Full IFFAR provided as Appendix C, Exhibit C-3.

### 6.2.3 Building Numbering and Signage

- **Entitlement evidence.** Building numbering is shown on the entitlement plans (Buildings 1 through 4, with sub-designations 1-1, 1-2, 1-3 for the commercial buildings). Address identification will be finalized during the CD phase consistent with LAFD standards. Per the LAFD comment letter, address numerals shall be plainly legible and visible from the street or road fronting the property.

### 6.2.4 Site-Specific Access Features

The Project includes site design features that incorporate the technical access requirements at the entitlement level:

- **LAFD Fire Station 78 proximity.** LAFD Fire Station 78 is located immediately east of the Project site across Whitsett Avenue, providing proximate emergency response capability. Fire Station 78 proximity is offered as descriptive site context; it is not credited toward Title 14 or LAFD technical requirements.
- **Multi-access urban design.** The four-driveway, two-street access configuration eliminates the single-access dead-end road vulnerability that is a primary access concern in hillside VHFHSZ developments.
- **All parking below grade.** 1,806 parking spaces are accommodated in four subterranean levels, eliminating surface parking that could impede fire apparatus access or create combustible vehicle exposure near buildings.

## 6.3 Defensible Space (California PRC Section 4291/CGC Section 51182)

### 6.3.1 Defensible Space Zone Analysis for Urban Infill

The traditional three-zone defensible space framework (0 to 5 ft, 5 to 30 ft, 30 to 100 ft) was developed primarily for structures in wildland-adjacent settings with surrounding vegetation. For this constrained urban infill site, the defensible space analysis is adapted to the built environment while maintaining the functional objectives of each zone.

- **Zone 0 (0 to 5 ft, Immediate/Ember-Resistant Zone).** The landscape plan (Sheet L01) and building sections show hardscape at the building perimeter, including concrete sidewalks along Ventura Boulevard and Valleyheart Drive, paved vehicular access areas, and concrete podium decks at courtyard levels. The 5 ft immediate zone around all building perimeters will be predominantly noncombustible hardscape surfaces, consistent with current Zone 0 guidance (no combustible materials within 5 ft of structures). The Project documents a design commitment to comply with the Board of Forestry and Fire Protection Zone 0 prescriptive standard in effect at construction document submittal.

- **Zone 1 (5 to 30 ft, Lean/Clean/Green Zone).** Within this zone, the site plan shows landscaped areas, pedestrian walkways, courtyards, pool decks, and vehicular access routes. The landscape plan indicates irrigated planting areas with a fully automatic underground irrigation system incorporating ET weather-based control. The 36,800 sq ft of landscape area represents 14% of the site, a modest landscape-to-hardscape ratio typical of urban mixed-use development.
- **Zone 2 (30 to 100 ft, Reduced Fuel Zone).** For an urban infill site of this size (approximately 1,300 ft long by 200 ft wide), the 100 ft Zone 2 radius extends to and beyond the property lines in most directions. The adjacent properties are existing commercial development, paved streets (Ventura Boulevard, Valleyheart Drive, Whitsett Avenue), and the concrete-channelized Los Angeles River, which satisfy the technical objectives of Zone 2 fuel reduction by their built-environment characteristics.

### 6.3.2 Landscaping and Vegetation

- **Landscape design approach.** The Landscape Entitlement Package (Sheets L01 through L28) shows the proposed planting design. The existing tree inventory (Sheets L02 through L05) identifies 186 existing trees surveyed, which includes both the on-site trees within the four parcels and street trees within the public right-of-way along Ventura Boulevard. All trees located on the Project site itself will be removed as part of demolition and site preparation. Twenty-eight existing street trees within the Ventura Boulevard public right-of-way (the site frontage) will be protected in place during construction and retained as part of the post-construction streetscape.
- **Plant combustibility caveats.** No plant species is noncombustible. Plant combustibility depends substantially on maintenance, irrigation, and drought stress rather than species selection alone. The Project's wildfire mitigation posture prioritizes: (a) spacing between plantings and structures; (b) irrigation reliability; (c) regular removal of dead plant material and debris; and (d) Zone 0 hardscape dominance.

### 6.3.3 Irrigation

Per Sheet L01 design notes, the irrigation system will be a fully automatic underground system with backflow prevention devices, designed for water efficiency with high-efficiency/low-precipitation products and an ET weather-based control system. Modern irrigation supports reduced plant flammability by maintaining adequate soil moisture.

- **CD phase item.** Include detailed irrigation plans with hydrozone planning, pressure mainline distribution, and irrigation maintenance schedule in construction documents. Specify a seven-day emergency repair timeline for irrigation failures as part of the operations and maintenance (O&M) framework (Section 7).

#### **6.3.4 LAFD Brush Clearance**

The LAFD 200 ft brush clearance requirement under LAMC Section 57.1.603.5 et seq. applies to properties in the VHFHSZ. For this urban infill site, the 200 ft brush clearance zone extends beyond the property boundaries into surrounding commercial development, paved streets, and the Los Angeles River channel, all noncombustible surfaces. The practical application of the brush clearance requirement is limited to on-site vegetation management, addressed through the defensible space framework and the O&M commitments in Section 7.

#### **6.3.5 Phasing and Interim Conditions**

The Project is proposed for two-phase construction under VTT Map No. 84453. Per the Construction Phasing memorandum prepared by the project owner (Figure 6), provided in Appendix G (Exhibit G-1):

1. Phase 1 includes Buildings 1, 2, and 3 — the eastern three buildings on the site, fronting Ventura Boulevard. Phase 1 begins with demolition of the existing City National Bank, Staples, Bed Bath & Beyond, and Carney's structures, followed by excavation, shoring, and garage construction (approximately twenty-two months), and three concurrent vertical construction sequences staggered by five months: Building 2 (twenty-nine months), Building 3 (twenty-six months), and Building 1 (twelve months).
2. Phase 2 includes Building 4 only — the western parcel, replacing the existing Pinz Bowling Center. Phase 2 begins after Phase 1 completion with 1.5 months of demolition and sitework, followed by eighteen months of garage construction and twenty-eight months of Building 4 vertical construction.

#### **Interim Conditions**

- **Interim site condition.** During Phase 1 construction, the western parcel (the Pinz Bowling Center, future Building 4 footprint) remains operational as an existing commercial use. The western parcel is not cleared, fenced, or vacant during Phase 1; it continues to operate under existing use, with existing fire protection systems, occupancy controls, and brush clearance compliance maintained by the existing tenant until Phase 2 demolition commences.
- **Per-phase code compliance — LAFD requirement.** The VTT Map (VTT-84453) — provided as Appendix I, Exhibit I-1 — is subject to the substantive conditions documented in the Bureau of Engineering Revised Report dated 29 January 2026 (Appendix C, Exhibit C-4) and the LAFD Inter-Departmental Correspondence (Appendix C, Exhibits C-1 and C-2). The LAFD revised letter dated 18 February 2026

(Appendix C, Exhibit C-2) imposes the following binding per-phase requirement on the phased project:

*The plot plans shall be approved by the Fire Department showing fire hydrants and access for each phase of the project prior to the recording of the final map for that phase. Each phase shall comply independently with code requirements.*

Each phase of the Project will be permitted, constructed, and certified for occupancy with independent compliance with the applicable code requirements, including fire access, fire hydrant coverage, fire alarm and sprinkler systems, and other life safety provisions. LAFD-approved plot plans for each phase will be submitted prior to the recording of the final map for that phase. Incorporation of this requirement as a binding condition of approval is administered by the City of Los Angeles through the tract-map approval and conditions process.

- **Construction phase fire safety.** During Phase 1 construction, fire apparatus access to the western parcel (Pinz Bowling Center/future Building 4) will be maintained via Ventura Boulevard. The Construction Phasing memorandum (Appendix G, Exhibit G-1) routes general construction-related deliveries through Valleyheart Drive but identifies that foundation pour trucks will be staged on Ventura Boulevard with associated one-to two-day partial closures during the foundation pour. Such temporary closures require construction phase coordination with the LAFD and the Los Angeles Department of Transportation and shall not impair required emergency access; concurrent emergency access shall be maintained via Valleyheart Drive and from unaffected portions of the Ventura Boulevard frontage during any closure period. The on-site fire lanes serving Phase 1 buildings will be installed and operational prior to vertical construction, consistent with the LAFD comment letter (no framing until the roadway is installed to LAFD's satisfaction).
- **Defensible space during interim period.** Because the western parcel remains operational during Phase 1, the existing tenant's defensible space and brush clearance obligations under LAFD Brush Clearance Unit standards continue without interruption. After Phase 2 demolition completion and during the period preceding Phase 2 vertical construction, interim defensible space provisions apply: (a) removal and prevention of combustible debris accumulation; (b) temporary fencing to prevent unauthorized storage of combustible materials; (c) maintenance of fire apparatus access; and (d) weed abatement on exposed soil areas. These interim provisions will be documented in the recorded Covenants, Conditions, and Restrictions (CC&Rs) or an equivalent recorded maintenance agreement and coordinated with LAFD as part of the Phase 2 construction permit.

### 6.3.6 Title 14 CCR §1276.01 — Building and Parcel Siting and Setbacks

- **Requirement.** Title 14 California Code of Regulations Section 1276.01 (the State Board of Forestry "Building and Parcel Siting and Setbacks" rule, effective 1 April 2023) applies to buildings on parcels in the LRA VHFHSZ. Section 1276.01(a) requires a minimum

30 ft setback for all buildings from all property lines and from the centerline of adjacent roads. Section 1276.01(b) authorizes a reduction where the reduction is based on practical reasons—explicitly including parcel size, topography, development density, and other site constraints—provided the Project incorporates alternative-means features to reduce structure-to-structure ignition, including (1) noncombustible block walls or fences; (2) noncombustible material extending five feet horizontally from the building; (3) hardscape landscaping; (4) reduced glazing on the side of the building with less than 30 ft setback; or (5) compliance with the most protective requirements in CBC Chapter 7A.

- **Section 1276.01(a) literal setbacks.** The Project is a dense urban infill mixed-use development on a 5.99 acre parcel along Ventura Boulevard. Building faces are set back from the back of sidewalk by approximately 5 to 10 ft, with noncombustible planters at most building edges. Measured to the centerlines of the adjacent streets, the building setbacks are:
  - Ventura Boulevard (south frontage): approximately 55 to 60 ft (compliant)
  - Valleyheart Drive (north frontage): approximately 20 to 30 ft (generally less than 30 ft)
  - Whitsett Avenue (east frontage): approximately 30 to 35 ft (at or near the threshold)
  - Shared western lot line: less than 30 ft (does not satisfy the property-line standard)

The Project does not satisfy the literal 30 ft Section 1276.01(a) standard at every building face. This is the normal condition for a dense urban infill project of this density and is precisely the regulatory case Section 1276.01(b) is written to address. The Project qualifies for the Section 1276.01(b) reduction on four independent grounds, any one of which satisfies the rule.

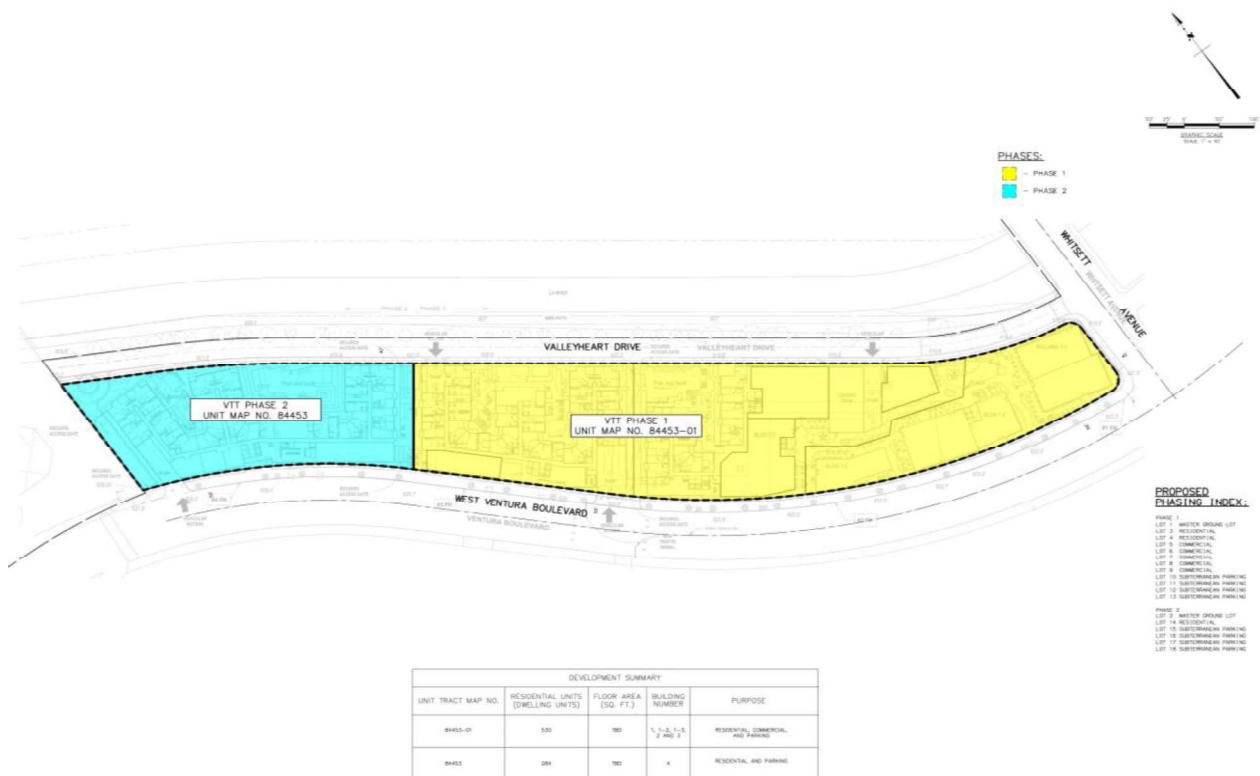
- **Development density (Section 1276.01(b) practical-reasons trigger).** The Project is 814 residential units on 5.99 acres—approximately 136 units per acre—within the City of Los Angeles Ventura/Cahuenga Boulevard Corridor Specific Plan, a designated high-density mixed-use corridor. This is the type of dense urban infill the rule was written to recognize as a practical reason for setback reduction.
- **Chapter 7A / CWUIC compliance (Section 1276.01(b)(5)).** The Project's entitlement-level documents are designed to comply with CBC Chapter 7A, succeeded by CWUIC 2025, Part 7 effective 1 January 2026, as documented in Section 6.1 of this report. Section 1276.01 expressly accepts Chapter 7A compliance as the alternative-means pathway. LADBS will enforce these requirements through the plan check and permitting process as a precondition to building-permit issuance and Certificate of Occupancy.
- **Hardscape landscaping (Section 1276.01(b)(3)).** The site plan provides continuous hardscape—sidewalks, paseos, plazas, podium decks, and fire-lane surfacing—

immediately adjacent to every building face, as documented in the Landscape Entitlement Package (Sheets L06 through L08, MVE+Partners / AO).

- **Noncombustible block walls (Section 1276.01(b)(1)).** The landscape design specifies 30 in. exposed high walls in noncombustible construction at building-edge planters throughout the Project, with 42 in. minimum planting depth (Sheets L06 through L08).

**Conclusion**

The Project complies with Title 14 CCR Section 1276.01 through the alternative-means compliance pathway in Section 1276.01(b). The reduction from the literal 30 ft setback is supported by the dense urban infill character of the Project and by the City of Los Angeles's Specific Plan designation. The Project incorporates four independent Section 1276.01(b) alternative-means features to reduce structure-to-structure ignition. Detailed product specifications and final compliance verification will occur during the CD phase through LADBS and LAFD plan check and permitting.



**Figure 6 – Phasing Exhibit (PL-1TTM01\_PHASE-EXHIBIT\_25-0611, Psomas, dated 11 June 2025)**

Phase 1 (yellow) includes Buildings 1, 2, and 3 on the eastern portion of the site; Phase 2 (blue) includes Building 4 on the western portion. Full-size sheet provided as Appendix G, Exhibit G-2.

## **6.4 LAFD and LAMC Fire Protection Features**

### **6.4.1 Automatic Sprinkler System**

The Project will be fully sprinklered to NFPA 13 (2022 edition, as adopted in California) throughout all buildings. The sprinkler system will be permitted through the design-build process, with the sprinkler contractor obtaining permits during the construction phase. Fire flow adequacy and hydraulic calculations will be confirmed using the IFFAR pressures (Section 6.2.2 and Appendix C, Exhibit C-3) as part of the sprinkler design-build permitting process. Full NFPA 13 sprinkler protection provides robust interior fire suppression. Interior sprinklers do not substitute for envelope hardening and defensible space for wildfire protection.

### **6.4.2 Fire Alarm System**

An automatic fire alarm system per NFPA 72 with occupant notification is required for the Project. LAFC 907 governs fire alarm systems within the City of Los Angeles. Under the 2026 LAFC (Los Angeles adoption of the 2025 California Fire Code), fire alarm and detection systems are addressed in 2026 LAFC, Section 907; the LAMC amendment numbering will be verified at CD phase against the currently adopted LAFC. Emergency responder radio coverage will be provided in all new buildings consistent with LAMC Section 57.510 (Los Angeles adoption of 2025 California Fire Code, Section 510, codified at 2026 LAFC Section 510). The LAFD comment letter cites the prior numbering "Los Angeles Fire Code Section 5101.1" through Reference FPB #105; that citation is from an out-of-date form letter and now points to the same substantive requirement codified at LAMC Section 57.510, based on existing public safety communication system coverage levels at the building exterior. Monitoring and signaling will be specified at CD phase.

### **6.4.3 Egress and Evacuation**

The entitlement plans show multiple stairways in each building, with building sections indicating enclosed exit stairways from the upper residential levels through the parking podium to grade-level exits. The multi-access site design provides vehicular and pedestrian egress via four driveway connections to two public streets. The LAFD comment letter requires that multi-storied residential buildings incorporate at least one access stairwell off the main lobby of the building,

within 150 ft of horizontal travel from the edge of the public street, private street, or fire lane, and that this stairwell extend onto the roof. Building geometry that satisfies the 150 ft horizontal travel requirement (and the wet standpipe outlet exception in LAFC Section 503.1.4) will be verified at CD phase.

#### **6.4.4 Fire Department Connections**

FDCs and standpipe systems will be specified at the CD phase. FDC locations will be coordinated with LAFD during the Hydrants and Access review to ensure accessibility from fire apparatus access routes.

#### **6.4.5 Emergency and Standby Power**

The Project will provide emergency and standby power for fire pump, smoke control, life safety, elevator, and emergency communications systems consistent with NFPA 110 (Standard for Emergency and Standby Power Systems) and 2026 LAFC Chapter 12. Emergency power supports continued operation of fire protection systems during a Public Safety Power Shutoff (PSPS), grid loss following a wildland fire event, or other utility interruption that may coincide with elevated wildfire response demand. Power source selection, transfer scheme, and run-time durations will be specified at CD phase consistent with NFPA 110, NFPA 70, and Los Angeles adoption amendments.

## 7. OPERATIONS AND MAINTENANCE FRAMEWORK

Wildfire mitigation is a performance-by-maintenance proposition. The code-based construction measures documented in this report establish baseline protection at the time of construction; ongoing effectiveness depends on sustained O&M. For a multi-family/commercial mixed-use project where maintenance responsibilities are institutional (property management) rather than individual homeowner-driven, O&M commitments must be documented in recorded instruments running with the property.

The following O&M commitments will be documented in recorded CC&Rs or an equivalent recorded maintenance agreement:

- **Zone 0 housekeeping** (ongoing; fourteen-day corrective action). Inspection and maintenance of the 0 to 5 ft noncombustible zone around all buildings. No combustible items (furniture, planters with combustible media, firewood, propane tanks) stored within Zone 0.
- **Gutter and roof debris removal** (seasonal; thirty-day corrective action). Cleaning of roof surfaces, scuppers, and drainage paths.
- **Vent screening integrity** (annual; thirty-day corrective action). Inspection of all exterior ventilation openings to verify ember-resistant screens/vents are intact, undamaged, and free of debris or biological blockage.
- **Defensible space maintenance** (Zones 1 and 2; seasonal; thirty-day corrective action). Vegetation management including removal of dead vegetation and debris, pruning to prevent ladder fuels, and maintenance of required spacing.
- **LAFD brush clearance** (annual; by 1 June ). Compliance with the LAFD annual brush clearance inspection program.
- **Irrigation system reliability** (ongoing; seven-day emergency repair). Drought-stressed vegetation has materially increased flammability; irrigation failures will be treated as a wildfire mitigation deficiency requiring repair within seven calendar days. PSPS/Red Flag operating procedures will provide for irrigation continuity to the extent practicable using available emergency power and water resources.
- **Building envelope integrity** (annual; thirty-day corrective action). Inspection of exterior wall coverings, window/door seals, deck surfaces, and balcony assemblies for damage, deterioration, or gaps that could allow ember intrusion.

- **Access road operability** (ongoing). Maintain fire apparatus access roads and fire lanes free of obstructions. Maintain no-parking signage and fire lane marking. Establish tow authorization procedures during Red Flag Warning conditions.

## 8. COMPLIANCE MATRIX

Table 1 summarizes the Project’s incorporation of the technical wildfire mitigation requirements at the entitlement level. The legal characterization of these technical findings is reserved to the City of Los Angeles. “CD Phase” indicates that the Project's entitlement-level documents specify design features that comply with the technical requirement at the current level of design development, with detailed specifications, product data, or agency clearance to be confirmed during the CD phase through LADBS and LAFD plan check and permitting. “Incorporated” indicates that the Project's entitlement-level documents demonstrate compliance with the technical requirement at the current level of design development. Legal interpretation of these technical findings under CGC Section 65913.4(a)(6)(D) or any other statute remains with the City of Los Angeles.

**Table 1 – Compliance Matrix**

<b>Category</b>	<b>Requirement</b>	<b>Entitlement Evidence</b>	<b>Status</b>
CWUIC	Class A roof (§504.2)	Flat roof with parapet shown; Class A assembly to be specified at CD per ASTM E108 / UL 790	CD Phase*
CWUIC	Gutter debris (§504.4)	Internal scupper drainage; no exposed gutters	Incorporated
CWUIC	Ember-resistant vents (§504.10)	No eave/cornice vents (parapet design)	CD Phase*
CWUIC	Eaves/soffits (§504.3)	Parapet design eliminates exposed eaves	Incorporated
CWUIC	IR exterior walls (§504.5)	Stucco, metal, tile, aluminum (NC); composite panels per design commitment in §6.1.5	CD Phase*
CWUIC	Tempered glazing (§504.8)	Extensive glazing shown; specs at CD phase	CD Phase*
CWUIC	Exterior doors (§504.9)	Not detailed at entitlement	CD Phase*
CWUIC	Garage doors (§504.9.1)	Subterranean parking ramp entries; not detailed	CD Phase*
CWUIC	IR decking (§504.7)	Concrete podium decks (NC); balconies and pool deck specs at CD	CD Phase*
CWUIC	Projections (§504.7)	Balconies shown; underside details at CD	CD Phase*

Category	Requirement	Entitlement Evidence	Status
CWUIC	Underfloor enclosure (§504.6)	Concrete parking podium; no exposed underfloor	Incorporated
CWUIC	Roof-to-wall stopping (§504.2.2)	Parapet design addresses interface; firestop detail at CD	CD Phase*
CWUIC	Trellis restrictions	Open trellis shown on Bldg 1; specs at CD	CD Phase*
PRC 4290	Emergency access (Title 14, §1273)	4 driveways, 2 streets, fire lanes, flat site	Incorporated
CFC App. D	Aerial fire apparatus access (§D105)	Buildings >30 ft (84 ft); width sizing at CD	CD Phase*
PRC 4290	Water supply (Title 14, §1275)	LADWP IFFAR (4/29/2025): 6 hydrants, 9,000 gpm, 138–140 psi static; see Appendix C	Incorporated
PRC 4290	Signage (Title 14, §1274)	Building numbering shown	Incorporated
GC 51182	Zone 0 (0–5 ft)	Hardscape at building perimeters; commits to BOF prescriptive standard at CD	Incorporated
GC 51182	Zone 1 (5–30 ft)	Irrigated landscape; low fuel-load design	Incorporated
GC 51182	Zone 2 (30–100 ft)	Adjacent streets, commercial, LA River (NC)	Incorporated
GC 51182	Irrigation	Auto underground with ET control	Incorporated
GC 51182	Phasing interim conditions	Per Construction Phasing memo (App. G); per-phase compliance condition (LAFD 2/18/2026); existing Pinz remains operational during Phase 1	Incorporated
LAFD	Sprinkler system (NFPA 13)	All buildings sprinklered	CD Phase*
LAFD	Fire alarm (NFPA 72)	Required per CFC §907 (LAMC adoption to be verified)	CD Phase*
LAFD	Egress / stairways	Multiple stairways per building; LAFD 150 ft horizontal travel verified at CD	Incorporated
LAFD	Emergency / standby power	NFPA 110 standby; CFC Ch. 12; specs at CD	CD Phase*

**Abbreviations.** NC = noncombustible; IR = ignition-resistant; OSFM = Office of the State Fire Marshal; BML = Building Materials Listing; CD = construction documents. CWUIC = California Wildland-Urban Interface Code 2025.

## **9. LIMITATIONS AND QUALIFICATIONS**

This report is based solely on a desktop review of the entitlement-level documents identified in Section 2. The review did not include:

- A site visit or field observation of existing conditions
- Destructive or invasive investigation of materials or assemblies
- Wildfire behavior modeling, ember transport simulation, or fire spread analysis
- Independent fire flow calculations, testing, or water supply analysis (the IFFAR cited in Section 6.2.2 was prepared by LADWP and is referenced as documentation, not as independent SGH testing)
- Testimony at hearings or regulatory proceedings
- Evacuation capacity modeling or operational parking analysis for wildfire evacuation scenarios
- Review of LADBS-stamped construction documents (not yet prepared)

### **Entitlement-level Qualification**

The documents reviewed are entitlement-level drawings prepared for the DCP application, not LADBS-stamped construction documents. The Project has not yet undergone LADBS plan check for building code compliance, including CWUIC 2025 / VHFHSZ requirements. Many of the wildfire mitigation items identified in this report are documented as “CD Phase” items requiring further development, specification, and/or agency clearance at the CD phase.

### **Not a CEQA Wildfire Analysis**

This report is not a CEQA environmental impact analysis. It does not address the CEQA Guidelines Appendix G wildfire questions (evacuation plan impairment, exposure exacerbation, infrastructure risk, post-fire hazards), as the City of Los Angeles has determined that the project is statutorily exempt from CEQA.

This report does not constitute a guarantee or warranty of fire safety or survivability during a wildfire event. Wildfire behavior depends on weather, terrain, vegetation, suppression resources, and long-term maintenance, all of which are beyond the control of building design. Ongoing

effectiveness of the measures documented herein depends on construction quality conforming to the approved plans and sustained O&M performance as described in Section 7.

## 10. SUMMARY OF TECHNICAL FINDINGS

Based on our technical review of the entitlement-level documents for the proposed 814-unit mixed-use development at 12501–12555 West Ventura Boulevard (Riverwalk at Studio City) in Los Angeles, California, we provide the following summary of technical findings.

- **WUI building features (CWUIC 2025, Part 7).** Based on review of the entitlement-level documents, the Project's design complies with the technical requirements of CWUIC 2025, Part 7. Flat roofs with parapets comply with the Class A roof requirement (Section 504.2) and the gutter-debris and roof-to-wall firestopping requirements (Sections 504.4 and 504.2.2). Concrete podium construction complies with the underfloor enclosure requirement (Section 504.6). Predominantly noncombustible exterior cladding (stucco, metal, tile, aluminum) is consistent with Section 504.5 through the prescriptive compliance pathway. The Project documents a design commitment that all composite panel cladding products specified at CD phase will satisfy ASTM E136, CCR Title 19 Section 12-7A-1, or OSFM BML Category 8140. Composite panel product data, glazing specifications, door assemblies, vent details, and trellis specifications will be confirmed at CD phase through the LADBS plan check process. NFPA 285 will govern assembly-level fire performance for exterior wall assemblies where applicable.
- **Fire access and infrastructure features (California PRC Section 4290; Title 14 CCR).** The site plan incorporates four driveways connecting to two public streets (Ventura Boulevard and Valleyheart Drive) with fire lanes at both ends of the site, in compliance with the technical access provisions of Title 14, CCR, Section 1273. The LADWP IFFAR signed April 29, 2025 (Appendix C, Exhibit C-3) documents fire flow availability of six existing public hydrants on Ventura Boulevard with static pressure of 138 to 140 psi and residual pressure of 116 to 118 psi at 1,500 gpm flow, supporting the LAFD-required 9,000 gpm fire flow at the entitlement/project-record level. All buildings will be fully sprinklered to NFPA 13. Aerial fire apparatus access for the 84 ft Buildings 2, 3, and 4 will be provided at CD phase per 2026 LAFC, Appendix D, Section D105, with the aerial setup positions and access widths identified on the construction document plot plan submitted to the LAFD Hydrants and Access Unit. The Project documents a design commitment to per-phase code compliance consistent with the LAFD revised letter dated 18 February 2026 (Appendix C, Exhibit C-2).
- **Defensible space features (CGC Section 51182).** The site's constrained urban infill context provides hardscape-dominant perimeters (Zone 0), limited landscape fuel load at 36,800 sq ft/14% coverage with automatic ET-controlled irrigation (Zone 1), and noncombustible surroundings, including paved streets, existing commercial development, and the concrete-channelized Los Angeles River (Zone 2). The Project documents a design commitment to comply with the BOF and Fire Protection Zone 0 prescriptive standard in effect at construction document submittal (currently subject to ongoing rulemaking under Executive Order N-18-25).

- **Tract map status (background).** The Vesting Tentative Tract Map (VTT-84453) was approved by the Advisory Agency subject to the conditions documented in the Bureau of Engineering Revised Report (Appendix C, Exhibit C-4) and the LAFD comment letters (Appendix C, Exhibits C-1 and C-2); those documents and the tract map drawing (Appendix I, Exhibit I-1) constitute the substantive tract map record available at the date of this report. The approval is currently under appeal to the Planning Commission. The Project's discretionary entitlement applications, including the appeal, are scheduled for Planning Commission action on 11 June 2026. The substantive tract map record is consolidated in Appendix I to this report.
- **LAFD / LAMC fire protection features.** The Project incorporates fire protection features including full NFPA 13 sprinklers, automatic fire alarm with occupant notification consistent with 2026 LAFD, Section 907 (with Los Angeles adoption amendments to be verified at CD phase), emergency responder radio coverage per LAMC Section 57.510, multiple means of egress with stairwell-to-roof access from the main lobby, and emergency/standby power per NFPA 110 for fire pump, smoke control, life-safety, elevator, and emergency communications. LAFD Fire Station 78 is located immediately adjacent to the site.

### **Scope of Opinion**

The findings in this report are technical engineering opinions on the design features of the Project as documented in the entitlement-level materials and as they relate to the technical content of the codes and standards named in this report. Based on review of the entitlement-level documents, the Project's design features comply with the technical content of the codes and standards named in this report; agency clearance, detailed product specification, and construction-document verification will occur during the CD phase through the City of Los Angeles's standard LADBS and LAFD plan check and permitting workflow. Determinations of statutory interpretation—including the legal sufficiency of the City's determination of applicability and which AB 130 provision the Project is relying on—remain with the City of Los Angeles. These findings supplement the technical record supporting the City's determination of AB 130 eligibility.

## 11. REFERENCES

1. California Government Code Section 65913.4 (VHFHSZ carve-out and mitigation measure references).
2. Assembly Bill 130 - CEQA exemption for qualifying housing developments.
3. California Public Resources Code Section 4290 (development fire safety standards).
4. California Public Resources Code Section 4291 (defensible space requirements for SRA).
5. California Government Code Section 51182 (defensible space requirements for VHFHSZ); as amended by AB 3074 (2020) and SB 504 (2024).
6. Title 14, California Code of Regulations, Division 1.5, Chapter 7, Subchapter 2 (State Minimum Fire Safe Regulations), Sections 1273 through 1276.
7. California Wildland-Urban Interface Code 2025, Part 7.
8. California Building Code 2022, Chapter 7A (legacy WUI provisions).
9. 2026 Los Angeles Fire Code, Appendix D (Fire Apparatus Access Roads), Section D105 (Los Angeles adoption of 2025 California Fire Code, Appendix D).
10. 2026 Los Angeles Fire Code, Section 907 (Fire Alarm and Detection Systems).
11. 2026 Los Angeles Fire Code, Chapter 12 (Energy Systems).
12. Los Angeles Municipal Code Sections 91.7203, 91.7207, 57.4911, 57.510, and 57.1.603.5 et seq.; Los Angeles Municipal Code Chapter V, Article 7.1 (LAWUIC).
13. Los Angeles Board of Fire Commissioners report describing 2025 California Wildland-Urban Interface Code adoption, November 2025.
14. Los Angeles Department of Building and Safety, Fire Hazard Severity Zone Supplemental Correction List PC.STR.Corr.Lst.116 (Rev. 2025-12-23).
15. Los Angeles Department of Building and Safety Information Bulletin governing combustible trellis, deck, and roof restrictions [bulletin number to be verified against the current LADBS bulletin index at CD phase].
16. Office of the State Fire Marshal Building Materials Listing (BML) Program and WUI Products Handbook.
17. NFPA 13 (Standard for the Installation of Sprinkler Systems), 2022 edition (as adopted in California).

18. NFPA 72 (National Fire Alarm and Signaling Code), 2022 edition (as adopted in California).
19. NFPA 110 (Standard for Emergency and Standby Power Systems).
20. NFPA 285 (Standard Fire Test Method for Evaluation of Fire Propagation Characteristics of Exterior Wall Assemblies Containing Combustible Components).
21. ASTM E108 / UL 790 (Class A roof assembly tests); ASTM E136 (noncombustible classification).
22. California Code of Regulations Title 19, Sections 12-7A-1 (Exterior Wall Siding and Sheathing), 12-7A-2 (Exterior Windows), 12-7A-3 (Horizontal Projection Underside), 12-7A-4 (Decking), and 12-7A-5 (Ignition-Resistant Material).
23. Insurance Institute for Business & Home Safety (IBHS), "Wildfire: Ember Entry Through Vents," IBHS Wildfire Prepared Home Technical Standard.
24. National Institute of Standards and Technology (NIST), "Quantifying Firebrand Exposures in the Wildland-Urban Interface."
25. Cohen, J.D. (2000), "Preventing Disaster: Home Ignitability in the Wildland-Urban Interface."
26. California Department of Forestry and Fire Protection (CAL FIRE), "Defensible Space" and "Fire Smart Landscaping" guidance.
27. Board of Forestry and Fire Protection (BOF), Defensible Space Zones 0, 1, and 2 rulemaking; Executive Order N-18-25 (Zone 0 rulemaking timeline).
28. LAFD Inter-Departmental Correspondence — VTT-84453-HCA (12501 W. Ventura Blvd.) Fire Comments, dated November 12, 2025; and VTT-84453-HCA-REVISED, dated February 18, 2026 (Appendix C, Exhibits C-1 and C-2).
29. LADWP Information of Fire Flow Availability Report (IFFAR), signed by Kimberly Haas on April 29, 2025 (Appendix C, Exhibit C-3).
30. Bureau of Engineering Revised Report — Vesting Tentative Tract Map No. 84453, Hui Huang, Principal Civil Engineer, dated January 29, 2026 (Appendix C, Exhibit C-4).
31. Construction Phasing memorandum, prepared by the project owner (Torino Companies) (Appendix G, Exhibit G-1).

**Appendix A**  
**Legal Nexus**

## A.1 Purpose

California Government Code Section 65913.4(a)(6)(D) references three categories of fire-related codes and standards that, if incorporated into a housing development project located within a Very High Fire Hazard Severity Zone, permits application of the AB 130 CEQA exemption to that project. This appendix is a technical reference that pairs the Project’s entitlement-level design features with the technical content of those three categories. It is provided to support the City of Los Angeles’ analysis of California Government Code Section 65913.4(a)(6)(D) and any AB 130 provisions; it does not opine on the legal effect of the Project’s features.

The three categories named in the subdivision are: (i) defensible space pursuant to California Public Resources Code Section 4291 or California Government Code Section 51182; (ii) development fire safety standards pursuant to California Public Resources Code Section 4290 and its implementing regulations; and (iii) wildland-urban interface (WUI) building standards (California Wildland-Urban Interface Code 2025, Part 7, successor to California Building Code, Chapter 7A).

## A.2 Crosswalk Table

Category	Named Codes / Standards	Project Design Features (Technical)	Report Reference
(i) Defensible Space	California Government Code Section 51182 (LRA-VHFHSZ); California Public Resources Code Section 4291 (SRA equivalent)	Hardscape-dominant Zone 0 (0–5 ft) at all building perimeters; irrigated, hydrozoned Zone 1 (5–30 ft) with ET-controlled smart irrigation; Zone 2 (30–100 ft) extends into noncombustible adjacent surfaces (paved streets, existing commercial development, concrete-channelized LA River). Design commitment: compliance with the BOF Zone 0 prescriptive standard in effect at CD phase. Brush clearance per Los Angeles Municipal Code Section 57.1.603.5 et seq.	Report §4.5; §6.3.1–6.3.4
(ii) Development Fire Safety Standards	California Public Resources Code Section 4290; Title 14, California Code of Regulations, Division 1.5, Chapter 7, Subchapter 2 (State	Four driveways onto two public streets; 20 ft fire lanes at both ends of the site; aerial fire apparatus access for the 84 ft Buildings 2, 3, and 4 to be detailed at CD per 2026 Los Angeles Fire Code, Appendix D, Section D105 (26 to 28 ft minimum at aerial setup positions); LADWP IFFAR signed 29 April	Report §4.4; §6.2; Appendix C

Category	Named Codes / Standards	Project Design Features (Technical)	Report Reference
	Minimum Fire Safe Regulations)	2025 documents 6 hydrants, 9,000 gpm aggregate flow, 138–140 psi static, 116–118 psi residual at 1,500 gpm; Knox Box per LAFD FPB Req. No. 75; building numbering per LAFD; per-phase compliance commitment per LAFD revised letter (18 Feb. 2026).	
(iii) WUI Building Standards	California Wildland-Urban Interface Code 2025, Part 7 (successor to California Building Code 2022, Chapter 7A); Los Angeles Municipal Code Article 7.1 (LAWUIC)	Class A flat-roof/parapet design (CWUIC §504.2); internal scupper drainage (§504.4); concrete-podium underfloor enclosure (§504.6); predominantly noncombustible exterior cladding (stucco, metal, tile, aluminum) per §504.5 prescriptive pathway; design commitment that all composite panel cladding products specified at CD will satisfy ASTM E136, Title 19 CCR §12-7A-1, or OSFM BML Cat. 8140; NFPA 285 governs assembly-level fire performance where applicable; balcony assemblies specified at CD per §504.7/§504.5; ember-resistant vents per §504.10; tempered glazing per §504.8; exterior doors per §504.9; garage doors per §504.9.1.	Report §4.3; §6.1; Appendices B and D

**A.3 Scope of This Crosswalk**

This crosswalk is a technical reference. It maps each of the three categories named in California Government Code Section 65913.4(a)(6)(D) to the corresponding Project design features documented in the entitlement-level materials, and it identifies items to be specified, detailed, or cleared at the Construction Document Phase. The legal effect of these technical features—including whether the Project has “adopted” fire hazard mitigation measures within the meaning of California Government Code Section 65913.4(a)(6)(D), and whether the entitlement-level commitments are sufficient as a matter of statutory interpretation—is not the subject of this appendix and is reserved to the City of Los Angeles.

**Appendix B**  
**Code Crosswalk**

## B.1 Purpose

The 2025 California Building Standards Code (Title 24), effective 1 January 2026, relocates the wildland-urban interface (WUI) building standards from California Building Code Chapter 7A (legacy 2022 location) to the California Wildland-Urban Interface Code 2025, Part 7. This crosswalk pairs legacy California Building Code Chapter 7A section numbers with the corresponding California Wildland-Urban Interface Code 2025, Part 7 section numbers, to support traceability of code references across the two cycles.

Section numbering in the table below reflects the published edition of the California Wildland-Urban Interface Code 2025. Where the Project uses references that may have been renumbered between the legacy California Building Code and California Wildland-Urban Interface Code 2025, the user should verify against the published 2025 text at the CD phase.

## B.2 Crosswalk Table

Legacy CBC Ch. 7A (2022)	CWUIC Part 7 (2025)	Subject
CBC 1505A	CWUIC §504.2	Class A roof assemblies
CBC 705A.2	CWUIC §504.2.2	Roof-to-wall fire stopping
CBC 705A.3	CWUIC §504.2.X (valley flashings, where applicable)	Valley flashings
CBC 705A.4	CWUIC §504.4	Gutter debris protection
CBC 706A.2 / 707A.3	CWUIC §504.10	Ventilation openings (ember/flame-resistant)
CBC 707A.3	CWUIC §504.5	Ignition-resistant exterior walls
CBC 706A.2 / 707A.8	CWUIC §504.3	Eaves and soffits
CBC 707A.8.7	CWUIC §504.6	Underfloor enclosure
CBC 708A.2.1	CWUIC §504.8	Exterior windows and glazing
CBC 708A.3	CWUIC §504.9	Exterior door assemblies
CBC 708A.4	CWUIC §504.9.1	Garage doors / vehicular access doors
CBC 709A.3	CWUIC §504.7	Projections, decks, and walking surfaces

### B.3 Test Method References

Test Method	Subject	Where Applicable
ASTM E108 / UL 790	Class A roof covering tests	CWUIC §504.2
ASTM E136	Noncombustible classification	CWUIC §504.5 (prescriptive); used for stucco, metal, tile, aluminum
California Code of Regulations Title 19, §12-7A-1	Ignition-resistant exterior wall test	CWUIC §504.5 (alternate)
California Code of Regulations Title 19, §12-7A-2	Exterior window ignition resistance test	CWUIC §504.8
California Code of Regulations Title 19, §12-7A-4	Decking ignition resistance test (burning brand / sustained flame)	CWUIC §504.7
California Code of Regulations Title 19, §12-7A-5	Ignition resistance — building materials	CWUIC §504.5 / §504.7
NFPA 285	Assembly-level fire propagation test (exterior wall assemblies with combustible components)	Multi-story exterior wall assemblies; applicability depends on final wall construction

**Appendix C**  
**Title 14 Access Worksheet**

## C.1 Purpose

This worksheet documents the Project's incorporation of the technical content of Title 14, California Code of Regulations, State Minimum Fire Safe Regulations governing emergency access, road grade and width, signage, water supply, and related provisions for development in VHFHSZ and SRA areas. It also documents the Project's response to the Los Angeles Fire Department (LAFD) comment letter requirements (Exhibits C-1 and C-2) and to the aerial fire apparatus access requirement triggered by the 84 ft Buildings 2, 3, and 4.

## C.2 Worksheet Table

Element	Standard	Plan Evidence	Sheet	Status
Road width (general fire apparatus access)	20 ft minimum unobstructed (Title 14 CCR §1273.01)	20 ft fire lanes shown both ends of site at Valleyheart frontage	Sections A-3.2 to A-3.4	Incorporated
Road width (aerial fire apparatus access)	26 ft minimum at aerial setup (CFC 2025, App. D, §D105.2); 28 ft where hydrants/aerial setup along access road (LAFD)	20 ft fire lane width does not show 26 to 28 ft aerial setup widths; sizing to be detailed at CD on plot plan submitted to LAFD H&A Unit	TBD at CD	CD Phase
Aerial access trigger	Required where vertical distance grade plane to highest roof >30 ft (CFC 2025, App. D §D105; LAFD letter)	Buildings 2, 3, 4 = 84 ft (>30 ft); aerial access required	A-2.1–2.4; A-3.1–3.4	Triggered
Road grade	Title 14 CCR §1273.02 (16% max); LAFD comment letter (10% max for private/public roadway)	Site essentially flat (608 to 628 ft)	Topo A-0.02C	Incorporated
Vertical clearance	13 ft 6 in. minimum (Title 14); 14 ft minimum (LAFD)	Multi-story buildings; no low overhead obstructions over fire access	Sections A-3.1	Incorporated
Dead-end provisions	Turnaround required if dead-ending; no dead-end >700 ft (LAFD)	Through-site access; 4 driveways; no dead-end fire lanes	Site plan A-0.3A	Incorporated
Road surface	All-weather surface, fire apparatus loading per Title 14 CCR §1273	Paved driveways and fire lanes; turf block artificial turf	Site plan; L09–L10	CD Phase

<b>Element</b>	<b>Standard</b>	<b>Plan Evidence</b>	<b>Sheet</b>	<b>Status</b>
	(subsection to be confirmed at CD)	at fire access lanes; load rating to be confirmed at CD		
Signage	Visible from public access; address numerals plainly legible (LAFD)	Building numbering shown	Plans	CD Phase
Knox Box	Required per LAFD FPB Req. No. 75; location and number determined by LAFD Field Inspector	Locations to be determined; specified at CD	TBD at CD	CD Phase
Gate operability	Electric gates approved and tested by LAFD prior to LADBS Certificate of Occupancy	6 ft vehicular double gates at secured fire access lane entries; specs at CD	L09–L10	CD Phase
Fire flow (water supply)	Title 14 CCR §1275; LAFD comment letter; LADWP IFFAR	LADWP IFFAR (Exhibit C-3, signed 4/29/2025): 6 hydrants F-73713, F-66720, F-63981, F-73711, F-75959, F-50644 on Ventura Blvd; 12 in. main; 138–140 psi static; 116–118 psi residual at 1,500 gpm; LAFD requirement 9,000 gpm at 6 hydrants; 4-hydrant sensitivity scenario annotated	LADWP IFFAR	Incorporated
Hydrant proximity	All structures within 300 ft of approved fire hydrant (LAFD letter)	6 public hydrants on Ventura Blvd within hydrant coverage area; on-site hydrants to be identified at CD on plot plan	Per IFFAR; CD plot plan	CD Phase
Per-phase compliance	Each phase shall comply independently with code requirements; LAFD plot plan approved before final map recordation for that phase (LAFD revised letter 2/18/2026)	Phase 1 = Buildings 1, 2, 3 (east); Phase 2 = Building 4 (west); per Construction Phasing memo (Appendix G, Exhibit G-1)	Phasing Exhibit G-2	Incorporated as commitment
Emergency responder radio coverage	LAMC §57.510 (LA adoption of CFC §510); LAFD letter Reference	Required in all new buildings; specified at CD	TBD at CD	CD Phase

Element	Standard	Plan Evidence	Sheet	Status
	FPB #105 cites prior LAFD §5101.1			
Address-side main lobby; stairwell to roof	LAFD letter — multi-story residential: stairwell off main lobby within 150 ft horizontal travel from public street/private street/fire lane; stairwell extends to roof	Verified at CD against final building geometry	TBD at CD	CD Phase
Overhead utility lines	Site plans shall include all overhead utility lines adjacent to the site (LAFD letter)	To be shown at CD	TBD at CD	CD Phase

**C.3 Aerial Fire Apparatus Access — CD Phase Detailing Plan**

The following detailing tasks will be completed at the Construction Document Phase to demonstrate aerial fire apparatus access for Buildings 2, 3, and 4:

1. Identify the aerial fire apparatus access road for each of Buildings 2, 3, and 4 on the construction document plot plan submitted to the LAFD Hydrants and Access Unit.
2. Provide minimum 26 ft unobstructed width at the aerial setup location, increased to 28 ft where fire hydrants or aerial apparatus operating positions are located along the access road, per 2026 Los Angeles Fire Code, Appendix D, Section D105.2 and the LAFD comment letter.
3. Provide a load-bearing surface rated for fire apparatus loading per Title 14, California Code of Regulations, Section 1273 (specific subsection to be confirmed at the Construction Documents Phase).
4. Identify the aerial setup positions on the plot plan, including any localized widening required at the aerial setup locations.
5. Coordinate with LAFD Hydrants and Access Unit during plan review.

**C.4 Exhibits**

- **Exhibit C-1.** LAFD Inter-Departmental Correspondence — VTT-84453-HCA Fire Comments, dated 12 November 2025.
- **Exhibit C-2.** LAFD Inter-Departmental Correspondence — VTT-84453-HCA-REVISED, dated 18 February 2026.

- **Exhibit C-3.** LADWP Information of Fire Flow Availability Report (IFFAR), signed by Kimberly Haas on 29 April 2025.
- **Exhibit C-4.** Bureau of Engineering Revised Report — Vesting Tentative Tract Map No. 84453, Hui Huang, Principal Civil Engineer, dated 29 January 2026.
- **Exhibit C-5.** Sheet A-0.3A — Project Data and Plot Plan (MVE + Partners, dated 18 September 2025). Master entitlement-level site plan showing all four buildings, four driveways, fire lanes, and project tabulations.
- **Exhibit C-6.** Civil Site Plan, prepared by Psomas. Shows building footprints, water mains, proposed and existing fire hydrant locations, and utility tie-ins along Ventura Boulevard, Valleyheart Drive, and Whitsett Avenue.
- **Exhibit C-7.** Sheet L09 — Residential Enlargement (East), prepared by AO Architects. Detail of east-end fire access lane (turf block / artificial turf), 6 ft vehicular double gate, courtyard, pool deck, and on-site infrastructure.
- **Exhibit C-8.** Sheet L10 — Residential Enlargement (West), prepared by AO Architects. Detail of west-end fire access lane and on-site fire hydrant location (#3 FH).

**Appendix D**  
**WUI Product Schedule**

## D.1 Purpose

This schedule identifies, by component, the OSFM Building Materials Listing categories and the California Code of Regulations Title 19 test methods that the Project commits to use at CD phase to demonstrate compliance with California Wildland-Urban Interface Code 2025, Part 7 and applicable Los Angeles amendments.

## D.2 Product Schedule and Permit Evidence Matrix

Component	2025 CWUIC §504 Reference	OSFM BML Category	Test Method	CD-Phase Evidence Required
Roof covering	§504.2 (Class A)	Cat. 8180	ASTM E108/ UL 790	Class A roof assembly product data; ICC-ES or OSFM research report
Roof valleys/details	§504.2.2 (where applicable)	Cat. 8180	ASTM E108/ UL 790	Continuity of Class A roof assembly at valleys, edges, and penetrations per listing
Gutters/downspouts	§504.4	—	Prescriptive (debris control) per CWUIC §504.4	Specify noncombustible gutter material with leaf/debris control
Eaves/soffits/ projection undersides	§504.3 (eaves/soffits) or §504.7 (projections)	Cat. 8160	SFM 12-7A-3 (horizontal projection underside)	Listed assembly or noncombustible/IR materials; parapet eliminates exposed eaves
Underfloor enclosure	§504.6	—	Prescriptive (concrete podium qualifies)	Concrete podium drawings; no exposed underfloor
Exterior projections/ decks/walking surfaces	§504.7 (especially §504.7.3.2)	Cat. 8110	SFM 12-7A-4 / 12-7A-4A	Listed deck assembly; concrete podium decks are NC; verify balcony deck assembly and pool-deck product at CD
Exterior windows/ glazed doors/ skylights	§504.8	Cat. 8120	SFM 12-7A-2 (window listed assembly)	Window/door schedule; min. one tempered pane per IGU, glass-block, or ≥20 min. fire-rated assembly
Exterior doors	§504.9	Cat. 8150	SFM 12-7A-1 (or solid-core ≥1-3/8 in. prescriptive)	Door schedule; OSFM BML listing or prescriptive compliance

<b>Component</b>	<b>2025 CWUIC §504 Reference</b>	<b>OSFM BML Category</b>	<b>Test Method</b>	<b>CD-Phase Evidence Required</b>
Garage doors/ vehicular access doors	§504.9.1	Cat. 8150	SFM 12-7A-1	Self-closing or auto-closing; weather-stripped to limit ember intrusion at parking ramp entries
Vents/ventilation openings	§504.10	Cat. 8165	ASTM E2886	OSFM-listed ember-resistant vents OR prescriptive 1/8 in. corrosion-resistant mesh; no eave/cornice vents
Exterior wall siding/ sheathing — composite panels	§504.5	Cat. 8140	SFM 12-7A-1 (siding/sheathing)	Confirm all composite panels meet ASTM E136 (NC) or 12- 7A-1 (IR) or BML Cat. 8140 listing; reference NFPA 285 for assembly-level performance where applicable
Trellis and shading structures	(local; LADBS Information Bulletin)	—	Per LADBS Information Bulletin	Specify NC or heavy-timber per current LADBS Information Bulletin (P/BC 2023-023, “Fire- Retardant Roof Cover”) — re- issuance under 2025 cycle to be verified at CD

### **D.3 Submittal Requirement**

Prior to installation of any WUI-regulated component, the contractor will provide submittals demonstrating that each component meets California Wildland-Urban Interface Code 2025 prescriptive requirements or is OSFM BML listed. Submittals will include manufacturer product data, ICC-ES or LARR research reports where applicable, and confirmation of the SFM 12-7A test method used. Submittals will be maintained in the permanent project record.

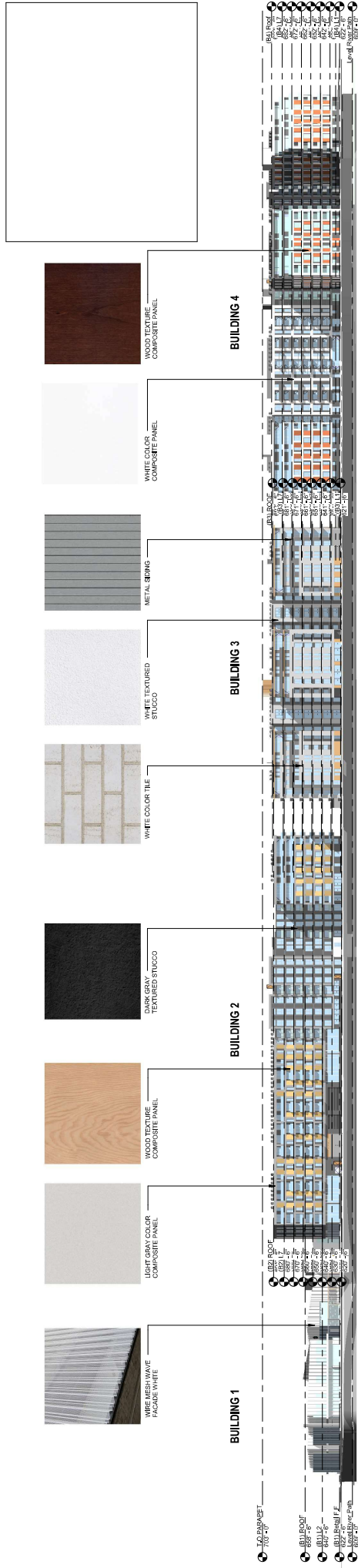
### **D.4 Assembly-Level Performance — NFPA 285**

For exterior wall assemblies that include foam plastic insulation or other combustible components, NFPA 285 (Standard Fire Test Method for the Evaluation of Fire Propagation Characteristics of Exterior Wall Assemblies Containing Combustible Components) governs assembly-level fire performance. The applicability of NFPA 285 to the Project’s exterior wall assemblies depends on the final wall construction selected at CD phase. For exterior wall

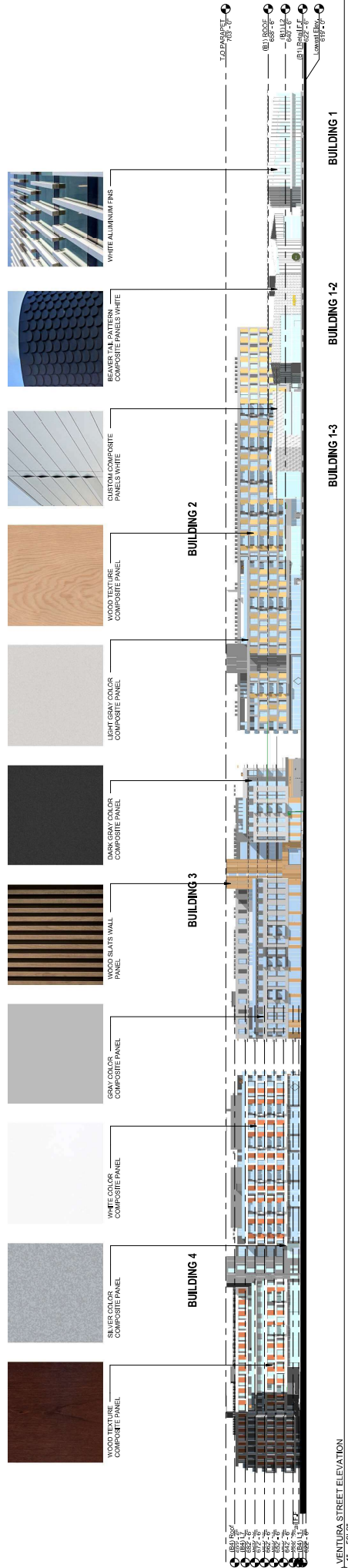
assemblies subject to NFPA 285, the wall assembly will be specified to a tested and listed NFPA 285-compliant configuration.

#### **D.5 Exhibits**

- **Exhibit D-1.** Sheet A-9.1 — Material Board (MVE + Partners, dated 9/18/2025). Identifies all exterior cladding materials by building, including textured stucco, composite panels, ceramic tile, metal siding, aluminum fins, and wire mesh wave facade. The material board is the entitlement-level reference for the §6.1.5 cladding analysis and the design commitment described in this appendix.



② VALLEYHEART DR. ELEVATION  
1" = 30'-0"



① VENTURA STREET ELEVATION  
1" = 30'-0"



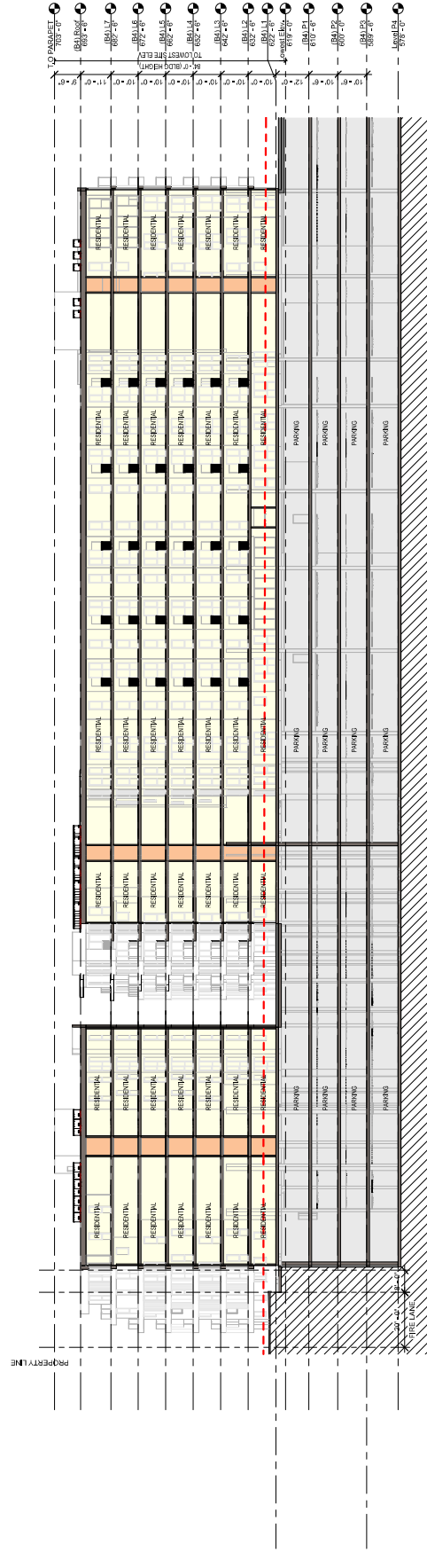
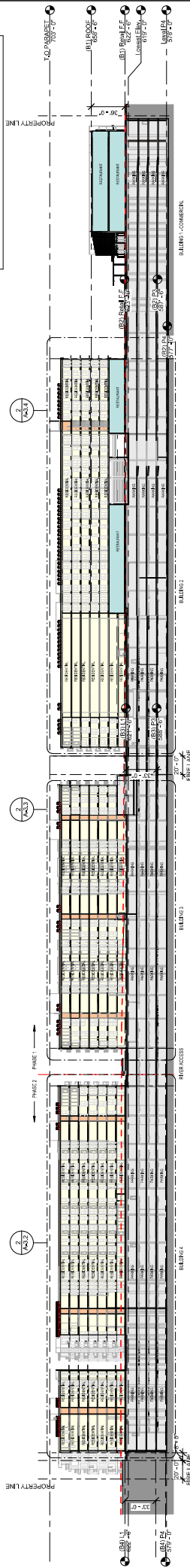
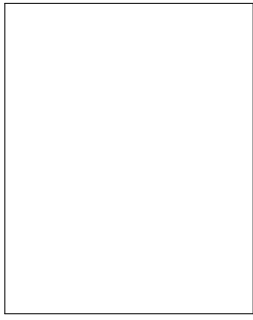
MATERIAL BOARD

12555 VENTURA BLVD  
STUDIO CITY, CA 91604

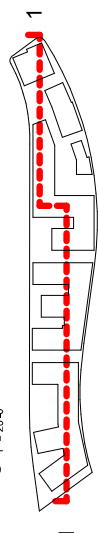
PROJECT #2019-10284

DATE ISSUED: 9/18/2025

0' 80' 160' 240'



2 SITE SECTION EW ENLARGED - B1  
1" = 2'-0"



BUILDING SECTION

12555 VENTURA BLVD  
STUDIO CITY, CA 91604

GENTON RICHIE GROUP

TORINO COMPANIES

MVE + PARTNERS

0' 20' 40' 60'

PROJECT #2019-10284

DATE ISSUED: 9/18/2025

A-3.2

**Appendix F**  
**Inspection Log Template**



**Appendix G**  
**Construction Phasing**

## G.1 Phasing Description

The Project is proposed for two-phase construction under Vesting Tentative Tract Map No. 84453. Per the Construction Phasing memorandum prepared by the project owner (Exhibit G-1):

### *Phase 1 — Eastern Site (Buildings 1, 2, and 3)*

- **Demolition and sitework.** Demolition of existing structures at 12605 Ventura (Building 3 future site), 12565 Ventura (Building 2 future site), and 12507 Ventura (Building 1 future site) — collectively the eastern parcels (City National Bank, Staples, Bed Bath & Beyond, Carney's). Approximately five months total.
- **Excavation, shoring, and garage construction.** Approximately twenty-two months. The garage works west to east; the western portion of the site is used for staging of foundation rebar; other deliveries are just-in-time.
- **Vertical construction (concurrent, staggered by five months).** Building 2: twenty-nine months; Building 3: twenty-six months; Building 1: twelve months.

### *Phase 2 — Western Site (Building 4 only)*

- **Demolition and sitework.** Demolition of the existing Pinz Bowling Center. Approximately 1.5 months.
- **Excavation, shoring, and garage construction.** Approximately eighteen months.
- **Vertical construction.** Building 4: twenty-eight months.

### *Site Operations During Phase 1*

- **Western parcel remains operational.** The Pinz Bowling Center continues to operate as an existing commercial use during Phase 1 construction. The western parcel is not cleared, fenced, or vacant during Phase 1; existing tenant fire protection systems, occupancy controls, and brush clearance compliance continue without interruption until Phase 2 demolition commences.
- **Construction trucking.** All construction-related trucking enters and exits via Valleyheart Drive; not Ventura Boulevard. Construction trucking does not block Ventura Boulevard fire apparatus access.
- **Just-in-time deliveries.** The project owner uses just-in-time deliveries to minimize on-site material storage; daily-to-weekly material staging only.

## G.2 Per-Phase Code Compliance

The LAFD Inter-Departmental Correspondence for VTT-84453-HCA-REVISED dated 18 February 2026 (Appendix C, Exhibit C-2) imposes the following requirement on the phased project:

The plot plans shall be approved by the Fire Department showing fire hydrants and access for each phase of the project prior to the recording of the final map for that phase. Each phase shall comply independently with code requirements.

- **Project commitment.** Each phase will be permitted, constructed, and certified for occupancy with independent compliance with the applicable code requirements. LAFD-approved plot plans for each phase will be submitted prior to the recording of the final map for that phase.

## G.3 Construction Phase Fire Safety Provisions

1. **Fire apparatus access during Phase 1 construction.** Fire apparatus access to the western parcel (Pinz/future Building 4) is maintained via Ventura Boulevard. The on-site fire lanes serving Phase 1 buildings are installed and operational prior to vertical construction. No framing is permitted until the fire access roadway is installed to LAFD satisfaction (LAFD comment letter).
2. **Fire flow availability during construction.** The six existing public hydrants on Ventura Boulevard documented in the LADWP IFFAR (Appendix C, Exhibit C-3) provide fire flow throughout the construction period. New on-site hydrants required by the Project will be installed and accepted by LAFD prior to building construction (LAFD comment letter).
3. **Construction site security.** The Phase 1 construction footprint is fenced and secured to prevent unauthorized storage of combustible materials or accumulation of debris.
4. **Construction debris management.** Combustible construction debris is removed on a regular schedule throughout the construction period.

## G.4 Interim Defensible Space Provisions (Between Phase 1 and Phase 2)

After Phase 2 demolition completion (Pinz Bowling Center) and during the period preceding Phase 2 vertical construction commencement, the western parcel will be a cleared and graded site under the operational control of the Project owner. Interim defensible space provisions for this period:

1. **Combustible debris.** No accumulation of combustible debris on the cleared Phase 2 parcels.

2. **Site security.** Temporary fencing or barriers to prevent unauthorized storage of combustible materials.
3. **Fire apparatus access.** Maintenance of fire apparatus access through and around the Phase 2 area, including the Phase 1 building service drives.
4. **Weed abatement.** Vegetation management on any exposed soil areas, with weed abatement timed to LAFD brush clearance season.

These interim provisions will be documented in the recorded CC&Rs or an equivalent recorded maintenance agreement and coordinated with LAFD as part of the Phase 2 construction permit.

### **G.5 Exhibits**

- **Exhibit G-1.** Construction Phasing memorandum, prepared by the project owner (Torino Companies).
- **Exhibit G-2.** Phasing Exhibit (PL-1TTM01\_PHASE-EXHIBIT\_25-0611), Psomas, dated 11 June 2025.
- **Exhibit G-3.** Promenade at Studio City Construction Schedule — Phased Option, dated 1 July 2024.
- **Exhibit G-4.** Sheet A-1.9 — Level 6 Floor Plan (MVE + Partners, dated 9/18/2025). Architectural floor plan view showing the Phase 1/Phase 2 line between Buildings 3 and 4 in the residential level plate; supplementary to the Phasing Exhibit (G-2).

## CONSTRUCTION PHASING

During garage construction – we will work from west to east. The western portion of the site will be used for staging of the foundation rebar. All other work deliveries will be just in time. For the foundation pour, trucks will be staged on Ventura Blvd. Each pour will be a 1-2 day closure. After the garage is completed the area where building 1 will be constructed will be used for staging for buildings 2 and 3. The western ground lot will not be used for staging as the western portion will still be operational at buildings. During phase 2, we will also use just in time deliveries and utilize the ground plane (area for future landscaping) for any on site material staging.

In general, we will require just in time deliveries. It's too difficult to manage stored material (working around it, safety, theft, etc.) so we try to only stage material needed in the next day to week max. Trucking will be in and out of Valleyheart drive, not Ventura.

Phase 1 includes Buildings 1, 2 and 3.

### Phase 1 East Site:

Demolition/ Sitework – Building 3 (12605 Ventura), Building 2 (12565 Ventura), Building 1 (12507 Ventura), - 5 Months Total

Excavation/Shoring/ Garage Construction – 22 months

Vertical Construction (Concurrent, staggered by 5 months)

First - Building 2 – 29 Months

Second - Building 3 – 26 Months

Third - Building 1 – 12 Months

Construction would begin on the West side of the site (At the current staples and work east across Ventura).

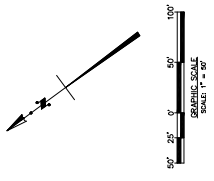
### Phase 2 West Site:

Demolition/ Sitework – Pinz - 1.5 Months Total

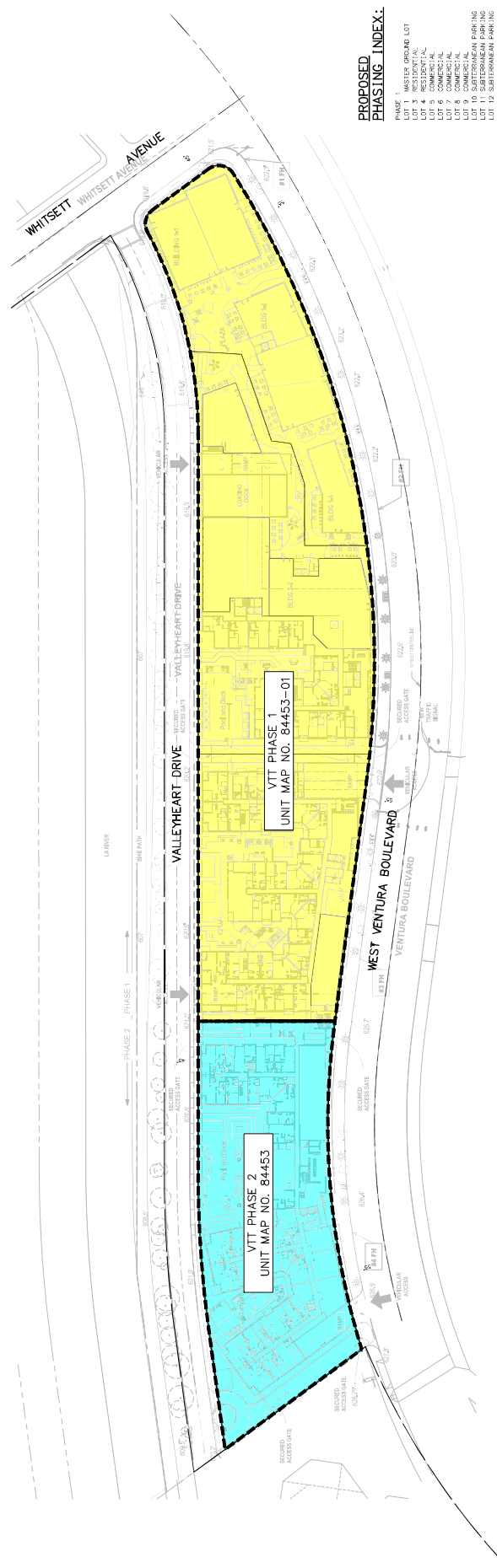
Excavation/Shoring/ Garage Construction – 18 months

Vertical Construction (Concurrent, staggered by 5 months)

First - Building 4 – 28 Months



PHASES:  
 - PHASE 1  
 - PHASE 2



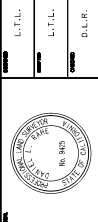
- PROPOSED PHASING INDEX:**
- PHASE 1
  - LOT 1 MASTER GROUND LOT
  - LOT 2 RESIDENTIAL
  - LOT 3 RESIDENTIAL
  - LOT 4 RESIDENTIAL
  - LOT 5 COMMERCIAL
  - LOT 6 COMMERCIAL
  - LOT 7 COMMERCIAL
  - LOT 8 COMMERCIAL
  - LOT 9 SUBSTANSION PARKING
  - LOT 10 SUBSTANSION PARKING
  - LOT 11 SUBSTANSION PARKING
  - LOT 12 SUBSTANSION PARKING
  - LOT 13 SUBSTANSION PARKING
  - PHASE 2
  - LOT 2 MASTER GROUND LOT
  - LOT 3 SUBSTANSION PARKING
  - LOT 4 SUBSTANSION PARKING
  - LOT 5 SUBSTANSION PARKING
  - LOT 6 SUBSTANSION PARKING
  - LOT 7 SUBSTANSION PARKING
  - LOT 8 SUBSTANSION PARKING

DEVELOPMENT SUMMARY			
UNIT TRACT MAP NO.	RESIDENTIAL UNITS (DWELLING UNITS)	FLOOR AREA (SQ. FT.)	PURPOSE
84453-01	530	760	RESIDENTIAL, COMMERCIAL AND PARKING
84453	284	760	RESIDENTIAL AND PARKING

**PSOMAS**  
 12501 - 12665 WEST VENTURA BOULEVARD  
 LOS ANGELES, CA 90027  
 (213) 293-1444 fax  
 www.psomas.com

PHASING EXHIBIT FOR VESTING  
 TENTATIVE TRACT MAP NO. 84453  
 12501 - 12665 WEST VENTURA BOULEVARD  
 COUNTY OF LOS ANGELES STATE OF CALIFORNIA

DATE	MAY, 12, 2024
SCALE	1" = 50'
PROJECT NO.	1510100100
SHEET NO.	1



## Promenade at Studio City - Baseline Construction Schedule Construction Completed in Multiple Phase

Primary Column	Start Date	Finish Date	Duration CD	2024	2025	2026	2027	2028	2029	2030	2031		
				Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4		
1	Preconstruction	01/01/24	06/30/27	1277d	Preconstruction							Phase 1 - East Site	
2	Entitlements	01/01/24	12/29/25	728d	Entitlements								
3	Construction Documents/Permitting	01/01/26	06/30/27	546d	Construction Documents/Permitting								
4													
5	Construction	07/08/27	08/11/31	1498d	Construction							Phase 1 - East Site	
6	Phase 1 - East Site	07/08/27	02/28/31	1930d	Phase 1 - East Site								
7	Notice to Proceed / Site Establishment - Phase 1	07/08/27	06/06/27	30d	Notice to Proceed / Site Establishment - Phase 1								
8	Demolition	08/07/27	10/29/27	84d	Demolition								
9	Demolition - Bldg. 1 (12507)	08/07/27	08/27/27	21d	Demolition - Bldg. 1 (12507)								
10	Demolition - Bldg. 2 (88B)	08/28/27	10/01/27	35d	Demolition - Bldg. 2 (88B)								
11	Demolition - Bldg. 3 (Staples)	10/02/27	10/29/27	28d	Demolition - Bldg. 3 (Staples)								
12	Excavation / Shoring	10/30/27	04/29/28	163d	Excavation / Shoring								
13	Site Clearing (69,735 SF)	10/30/27	11/19/27	21d	Site Clearing (69,735 SF)								
14	Shoring - Soldier Piles	11/19/27	12/17/27	35d	Shoring - Soldier Piles								
15	Lift 1 Excavation / Tie Backs (61.6K CY)	11/28/27	02/05/28	70d	Lift 1 Excavation / Tie Backs (61.6K CY)								
16	Lift 2 Excavation / Tie Backs (61.6K CY)	01/02/28	03/14/28	73d	Lift 2 Excavation / Tie Backs (61.6K CY)								
17	Lift 3 Excavation / Tie Backs (105K CY)	02/09/28	04/29/28	81d	Lift 3 Excavation / Tie Backs (105K CY)								
18	Backfill at Permanent Wall - Garage Divider												
19	Substructure	04/30/28	12/13/28	228d	Substructure								
20	Foundation Waterproofing	04/30/28	05/19/28	20d	Foundation Waterproofing								
21	Foundation	05/20/28	06/16/28	28d	Foundation								
22	BG Waterproofing Walls / Shotcrete	06/17/28	07/08/28	20d	BG Waterproofing Walls / Shotcrete								
23	BG Waterproofing Walls / CIP	07/07/28	07/16/28	10d	BG Waterproofing Walls / CIP								
24	Subterranean Elevated Deck P2	07/17/28	08/30/28	45d	Subterranean Elevated Deck P2								
25	Subterranean Elevated Deck P1	08/31/28	10/14/28	45d	Subterranean Elevated Deck P1								
26	Grade Level Elevated Deck	10/15/28	12/13/28	60d	Grade Level Elevated Deck								
27	Superstructure / Facade / Interiors	12/14/28	12/19/30	735d	Superstructure / Facade / Interiors								
28	Building 1	09/14/28	09/14/29	275d	Building 1								
29	Building 2	04/08/29	09/09/30	520d	Building 2								
30	Building 3	08/06/29	12/19/30	500d	Building 3								
31	Stilework/Paving/Landscape / Final Completion	05/02/30	02/28/31	270d	Stilework/Paving/Landscape / Final Completion								
32	Landscaping	06/02/30	01/27/31	240d	Landscaping								
33	Stilework / Paving	01/28/31	02/26/31	30d	Stilework / Paving								
34	Final Completion - Phase 1	02/26/31	02/26/31	0	Final Completion - Phase 1								
35	Phase 2 - West Site	12/19/28	08/11/31	966d	Phase 2 - West Site								
36	Notice to Proceed / Site Establishment - Phase 1	12/19/28	01/02/29	15d	Notice to Proceed / Site Establishment - Phase 1								
37	Demolition	01/03/29	02/06/29	35d	Demolition								
38	Demolition - Bldg. 4 (Pinz)	01/03/29	02/06/29	35d	Demolition - Bldg. 4 (Pinz)								
39	Excavation / Shoring	02/07/29	04/05/29	61d	Excavation / Shoring								
40	Site Clearing (58,845 SF)	02/07/29	02/07/29	1d	Site Clearing (58,845 SF)								
41	Shoring - Soldier Piles	02/08/29	02/22/29	15d	Shoring - Soldier Piles								
42	Lift 1 Excavation / Tie Backs (28K CY)	02/23/29	03/09/29	15d	Lift 1 Excavation / Tie Backs (28K CY)								
43	Lift 2 Excavation / Tie Backs (28K CY)	03/10/29	03/24/29	15d	Lift 2 Excavation / Tie Backs (28K CY)								
44	Lift 3 Excavation / Tie Backs (36.8K CY)	03/25/29	04/09/29	15d	Lift 3 Excavation / Tie Backs (36.8K CY)								
45	Substructure	04/09/29	01/06/30	276d	Substructure								
46	Foundation Waterproofing	04/09/29	05/03/29	25d	Foundation Waterproofing								
47	Foundation	05/04/29	05/31/29	28d	Foundation								





**Appendix H**  
**Existing Site Photographs**

## **H.1 Purpose**

This appendix provides documentation of the existing site condition at 12501-12555 W. Ventura Boulevard prior to redevelopment. The exhibits provide visual context for Section 3 (Project Description) of the main report and support the entitlement record by documenting the existing aging commercial buildings and surface parking that will be replaced by the Project.

## **H.2 Scope**

These exhibits are descriptive and contextual. They are not offered as code-compliance evidence for any of the three California Government Code Section 65913.4(a)(6)(D) categories. The technical features of the Project's wildfire mitigation design are documented in the main report and Appendices A through G; legal characterization of those features is reserved to legal counsel.

## **H.3 Existing Tenants and Structures**

As of the entitlement record, the following uses occupied the site:

- **12507 Ventura Boulevard:** City National Bank (one-story commercial)
- **12565 Ventura Boulevard:** Bed Bath & Beyond/Staples (one- to two-story commercial)
- **12605 Ventura Boulevard:** Carney's Restaurant (one-story commercial, repurposed rail car)
- **Western Parcel (Pinz Bowling Center):** One- to two-story commercial; remains operational during Phase 1 construction (see Appendix G)

All existing structures on the eastern parcels will be demolished as part of Phase 1. The Pinz Bowling Center will be demolished at the start of Phase 2.

## **H.4 Exhibits**

- **Exhibit H-1.** 12555 Ventura Photo Exhibit, dated 4 January 2024 (21 pages). Photographic documentation of the existing site condition prior to the Project.
- **Exhibit H-2.** Aerial Photograph of Existing Site Condition (Google Earth aerial; site outline by applicant).



①



Facing south toward the Project Site on the west side of the Project Site

②



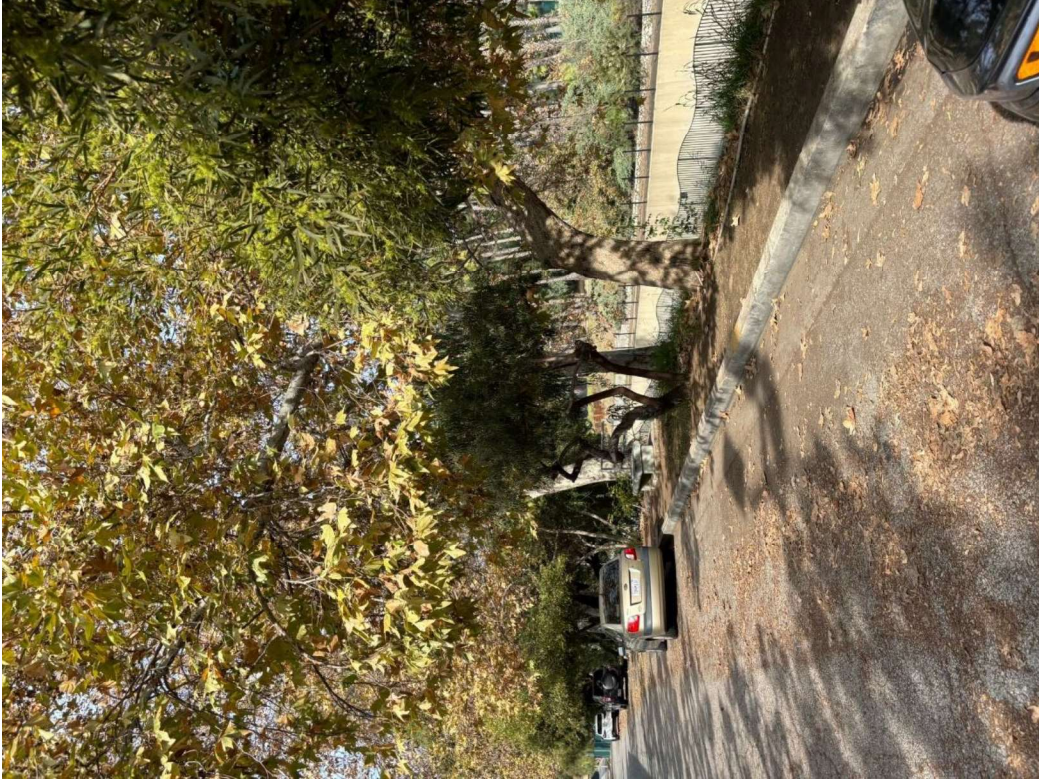
Facing southeast toward the Project Site on the west side of the Project Site

3



Facing west toward the Project Site on Valleyheart Dr.

4



Facing northwest away from the Project Site on Valleyheart Dr.

5



Facing south toward the Project Site on Valleyheart Dr.

6



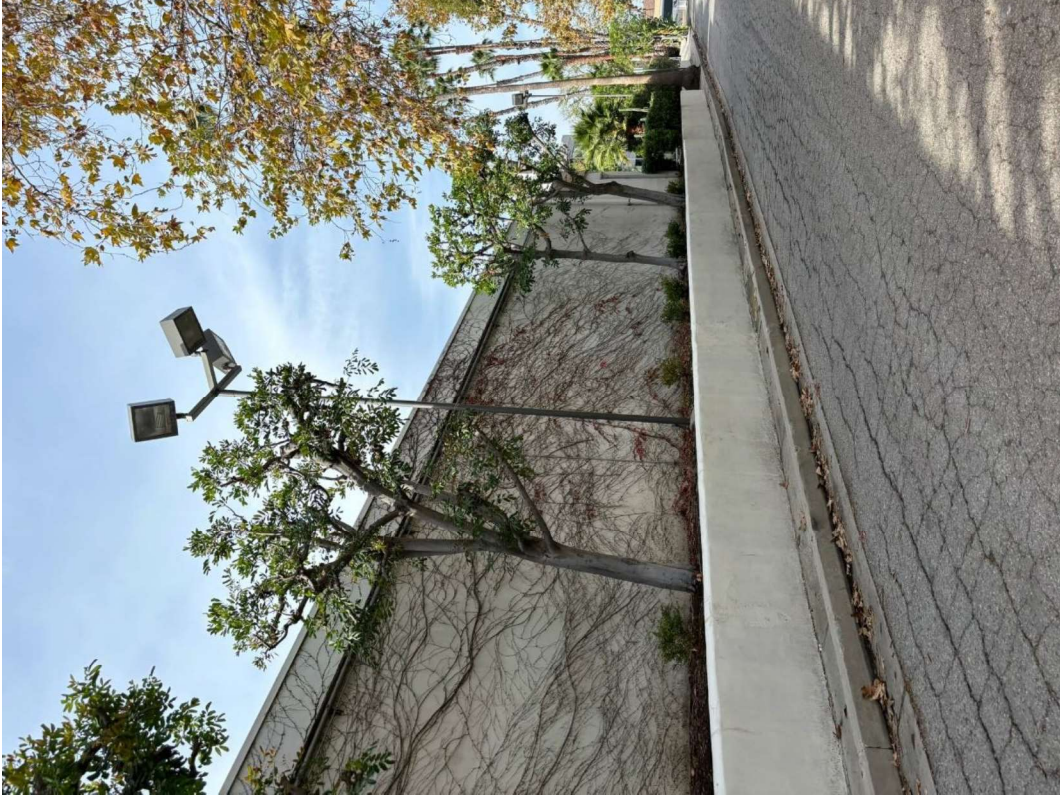
Facing north away from the Project Site on Valleyheart Dr.

7



Facing southwest toward the Project Site on Valleyheart Dr.

8



Facing southeast toward the Project Site on Valleyheart Dr.

9



Facing northeast away from the Project Site on Valleyheart Dr.

10



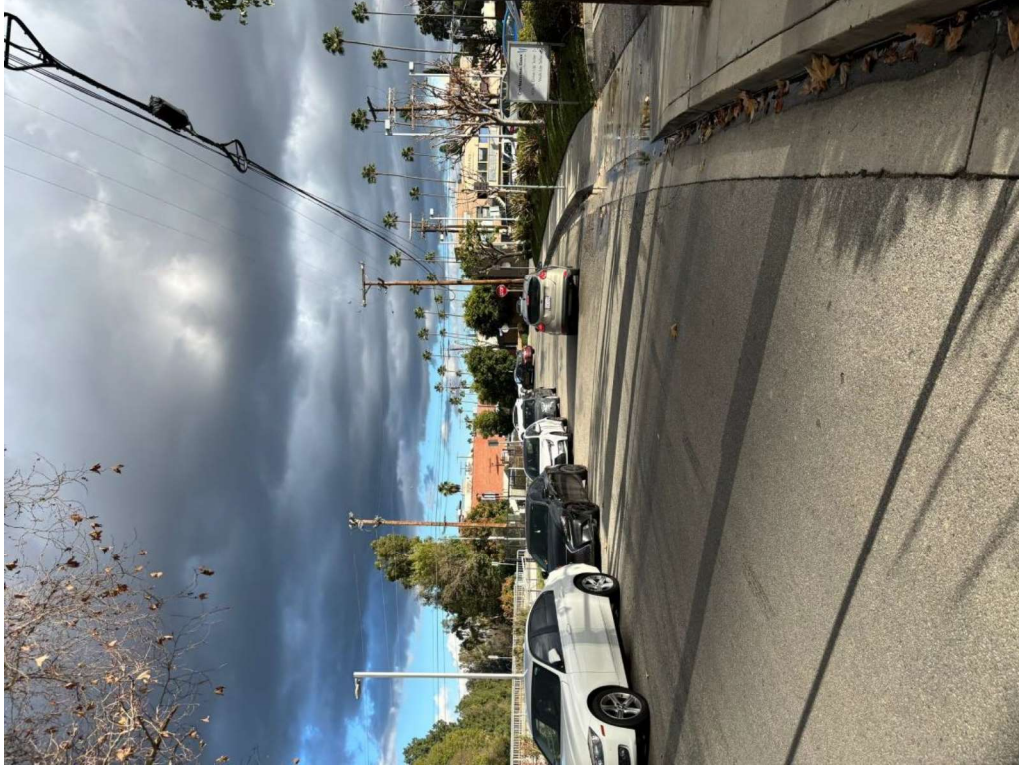
Facing west toward the Project Site on Valleyheart Dr.

11



Facing southeast toward the Project Site on Valleyheart Dr.

12



Facing east away from the Project Site on Valleyheart Dr.

13



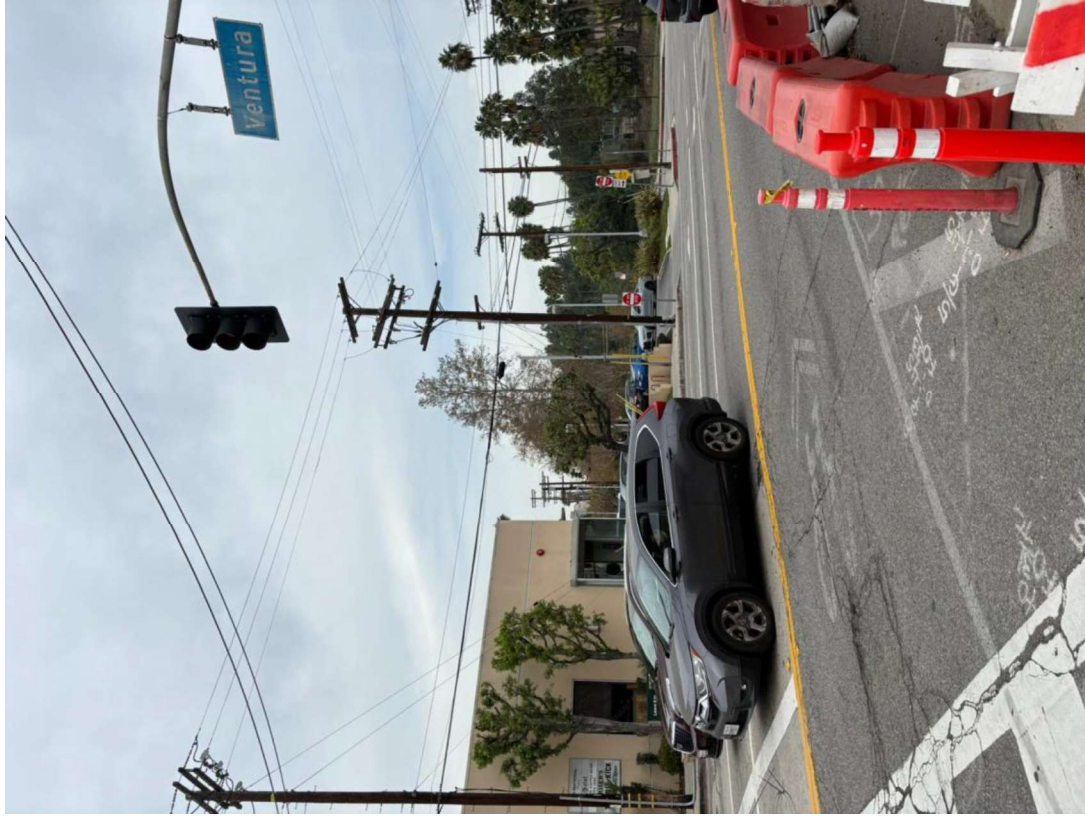
Facing east away from the Project Site on the corner of Whitsett Ave. and Valleyheart Dr.

14



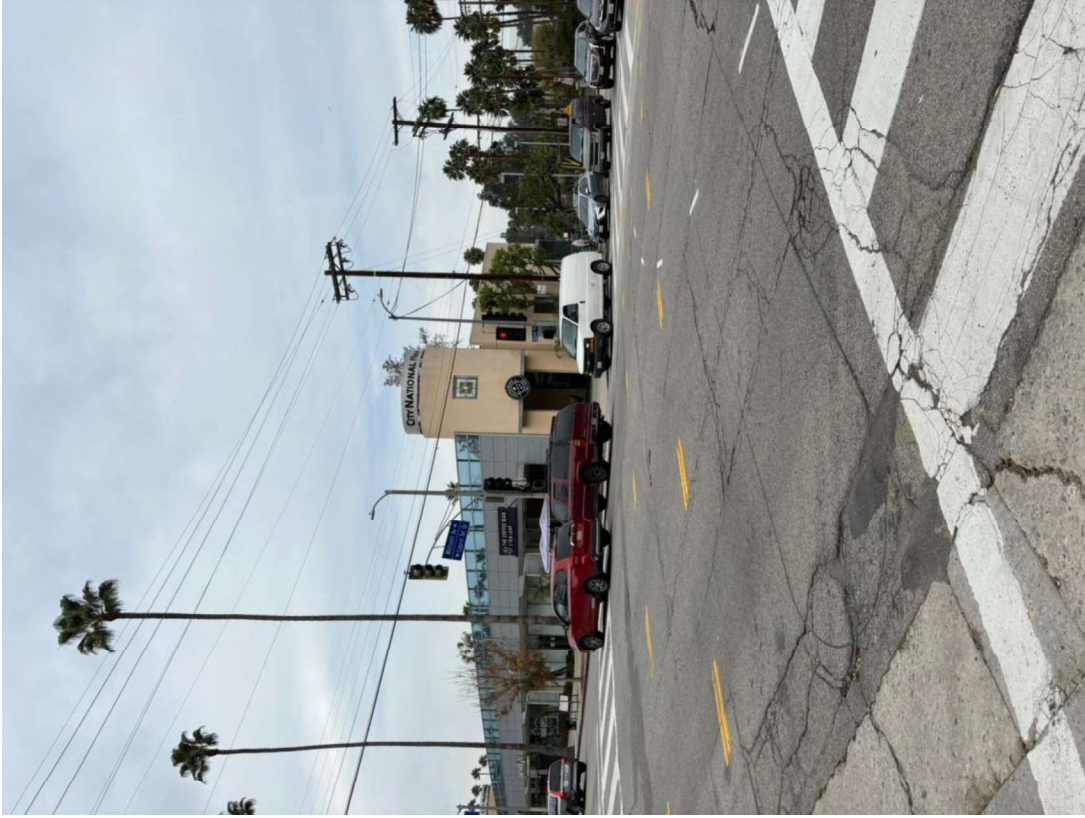
Facing south toward the Project Site on the corner of Whitsett Ave. and Valleyheart Dr.

15



Facing northwest toward the Project Site on the northeast corner of Ventura Blvd. and Whitsett Ave.

16



Facing northwest toward the Project Site on the northeast corner of Ventura Blvd. and Whitsett Ave.

17



Facing north toward the Project Site on the southwest corner of Ventura Blvd. and Whitsett Ave.

18



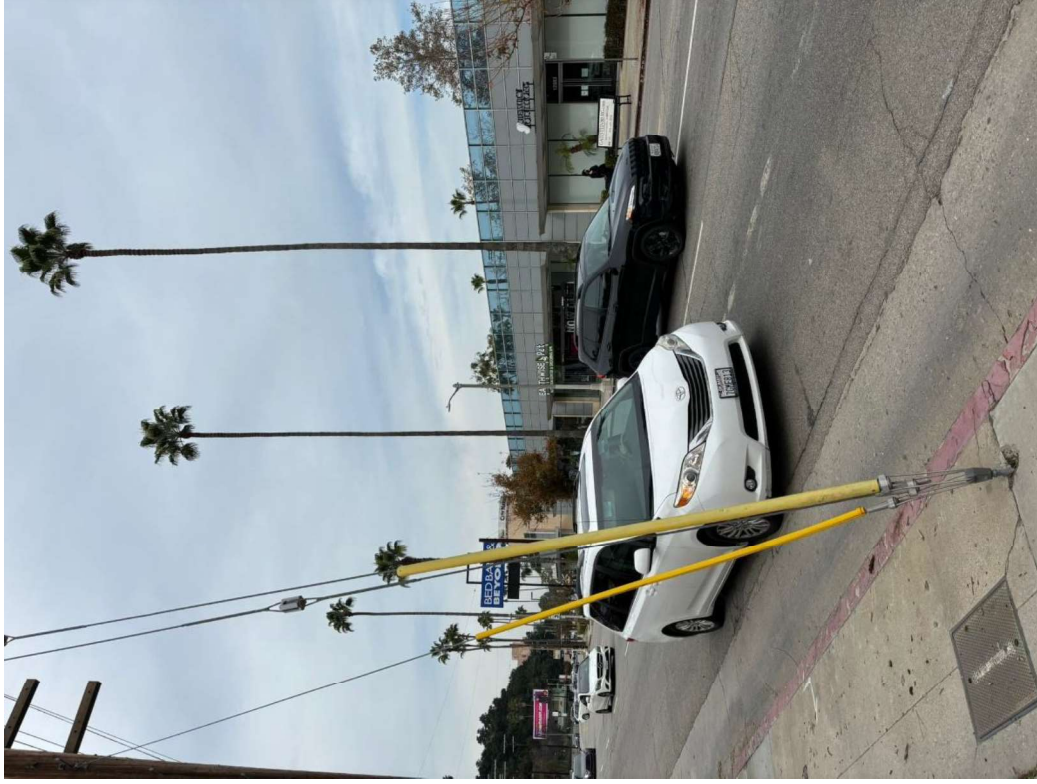
Facing northeast toward the Project Site on the southwest corner of Ventura Blvd. and Whitsett Ave.

19



Facing northeast toward the Project Site on the south side of Ventura Blvd.

20



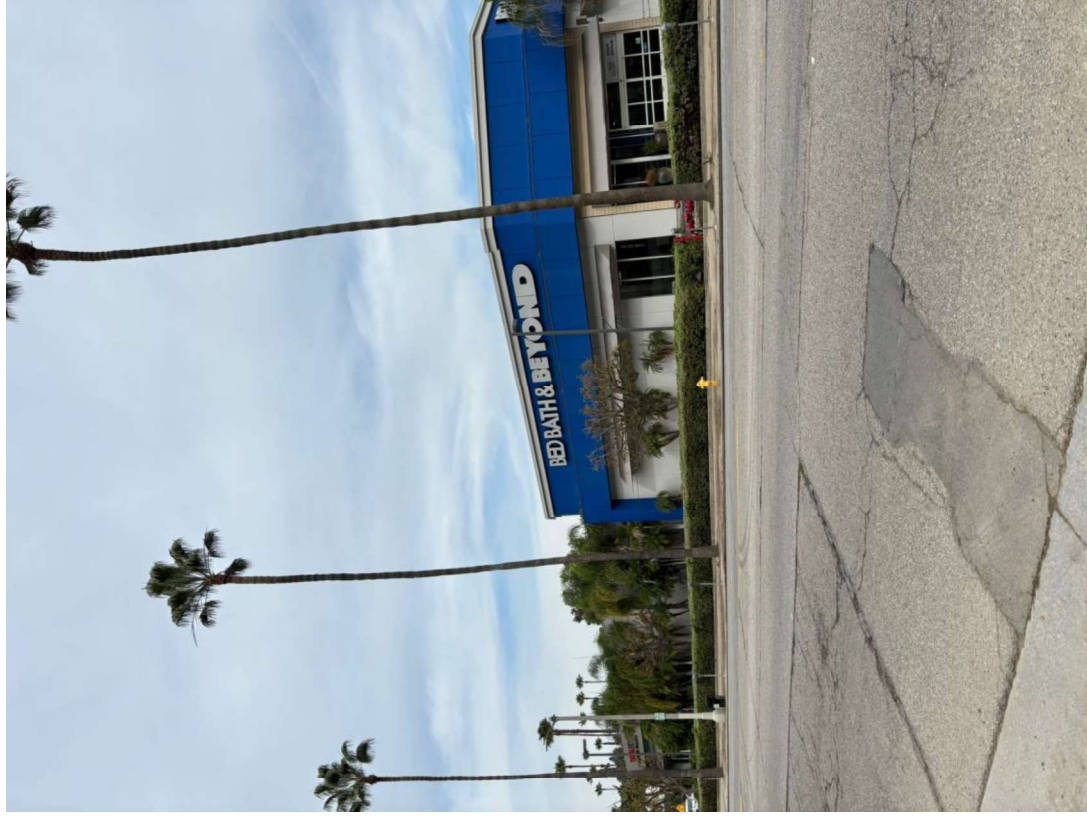
Facing northwest toward the Project Site on the south side of Ventura Blvd.

21



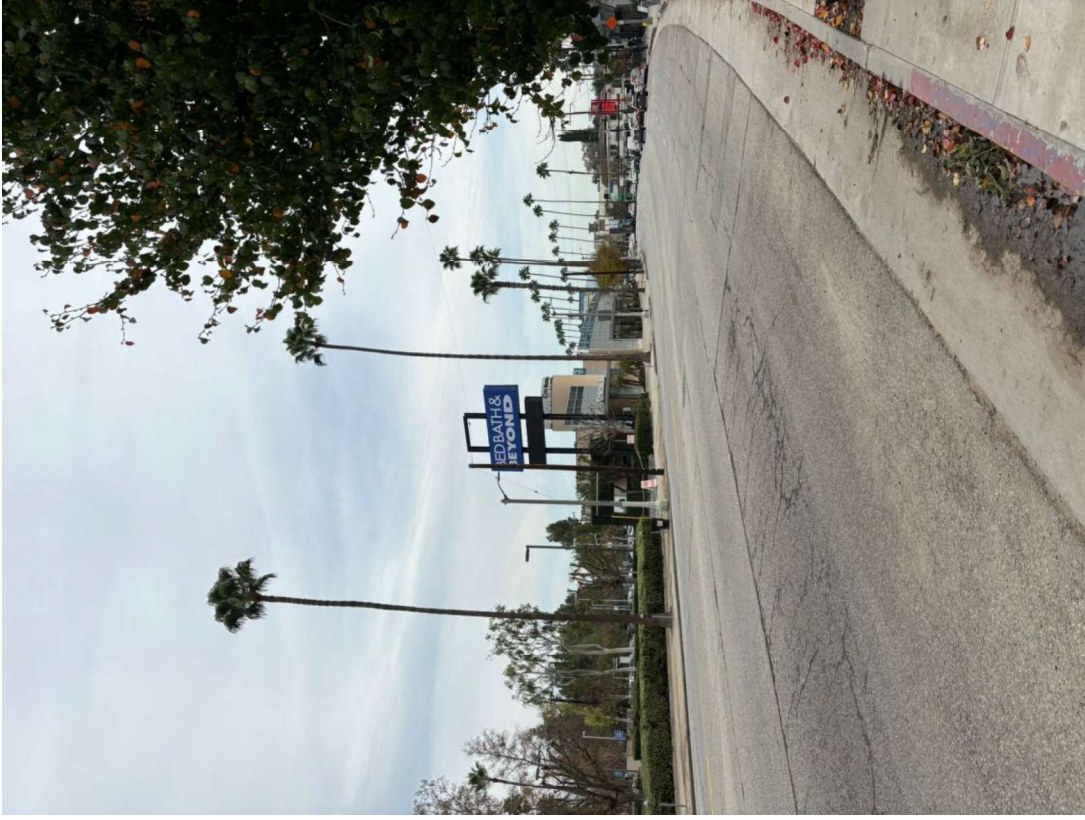
Facing northwest toward the Project Site on the south side of Ventura Blvd.

22



Facing north toward the Project Site on the south side of Ventura Blvd.

23



Facing northeast toward the Project Site on the south side of Ventura Blvd.

24



Facing northwest toward the Project Site on the south side of Ventura Blvd.

25



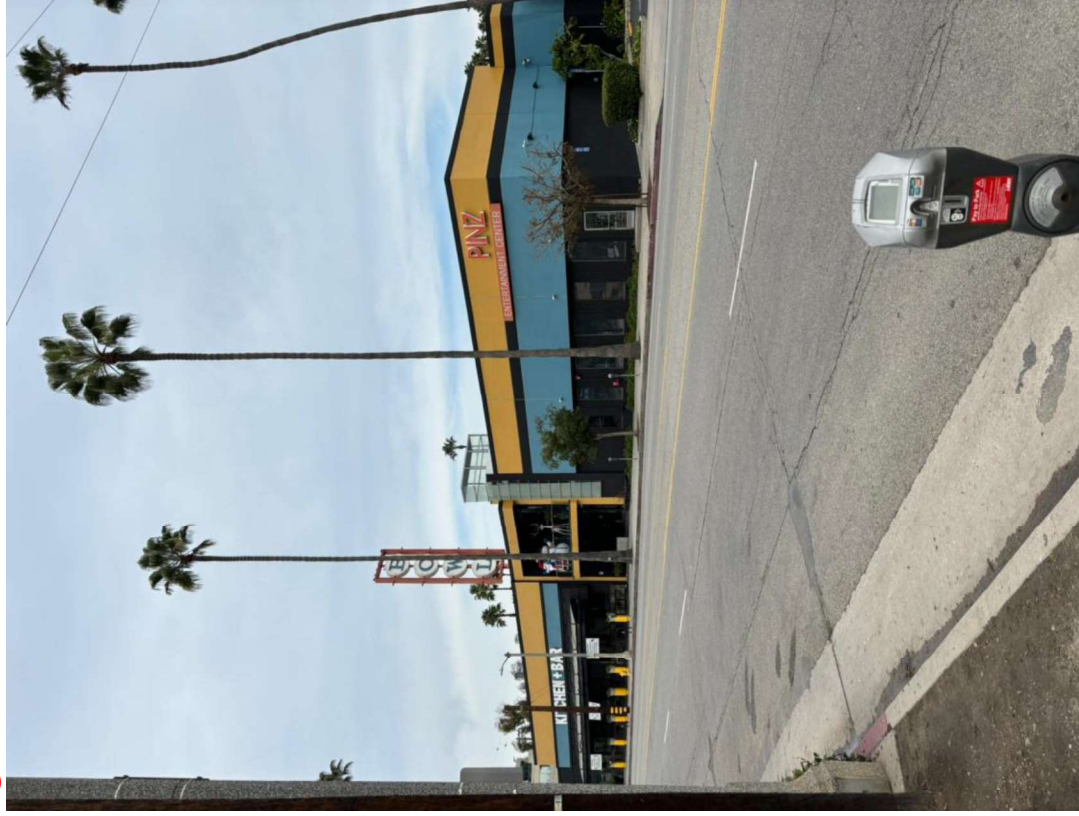
Facing north toward the Project Site on the south side of Ventura Blvd.

26



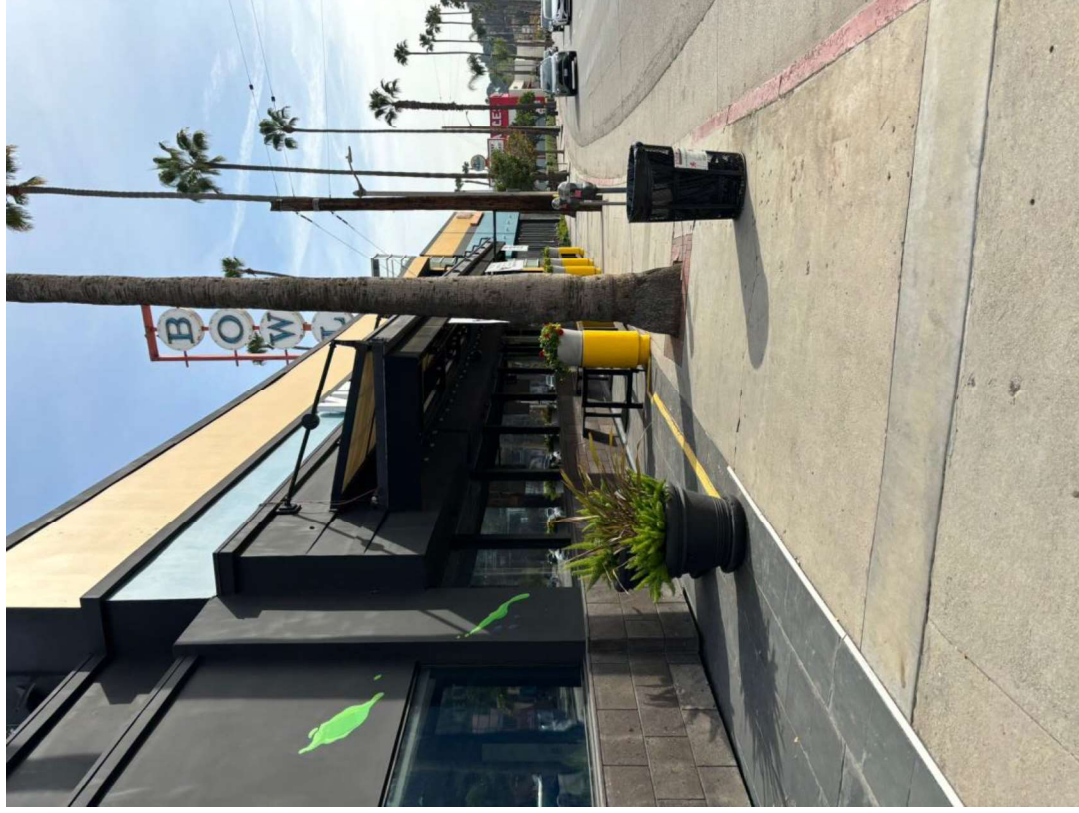
Facing north toward the Project Site on the south side of Ventura Blvd.

27



Facing northwest toward the Project Site on the south side of Ventura Blvd.

28



Facing west toward the Project Site on the north side of Ventura Blvd.

29



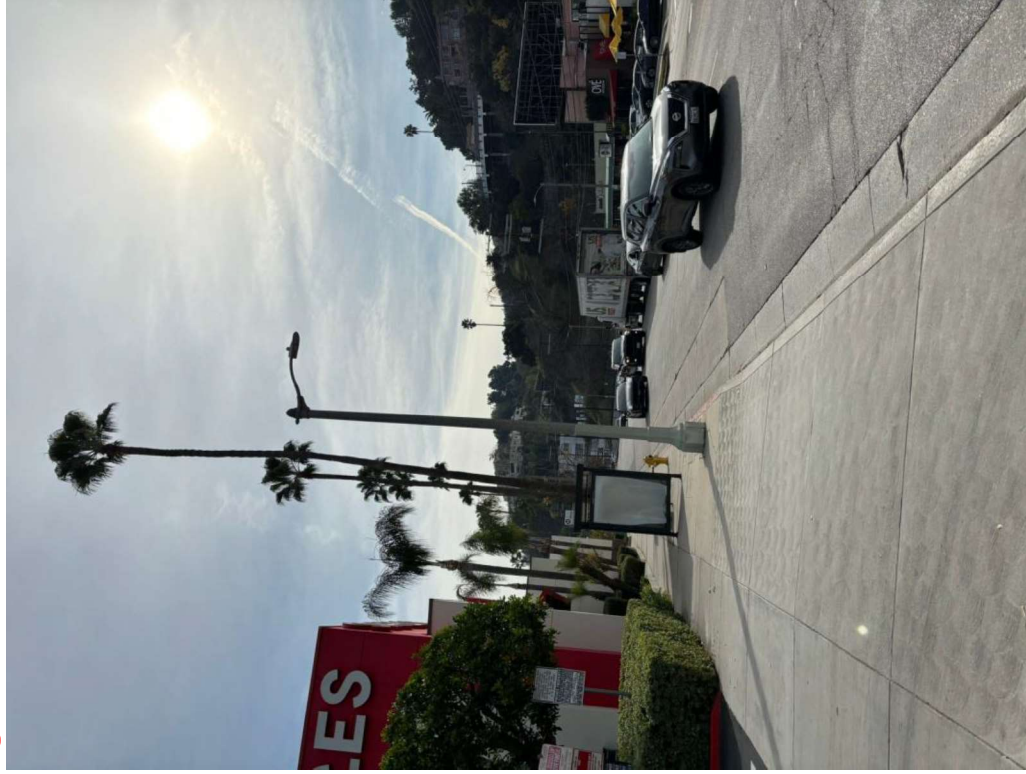
Facing northeast toward the Project Site on the north side of Ventura Blvd.

30



Facing northwest toward the Project Site on the north side of Ventura Blvd.

31



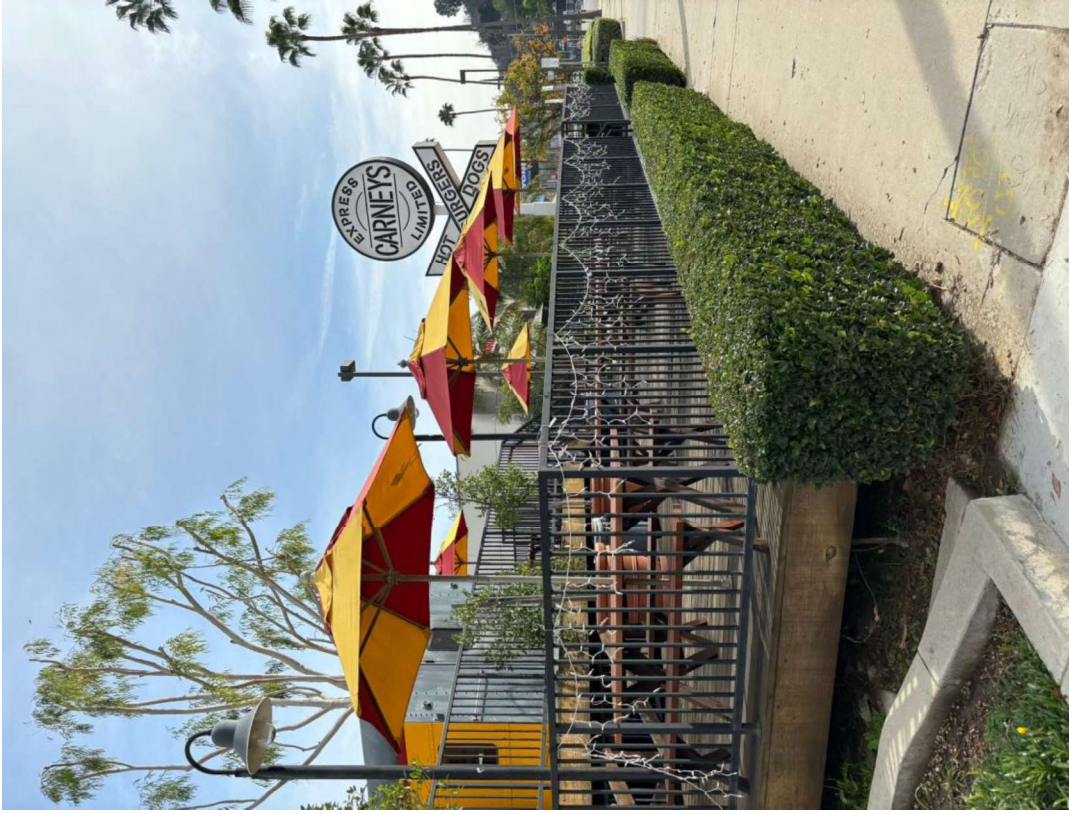
Facing west toward the Project Site on the north side of Ventura Blvd.

32



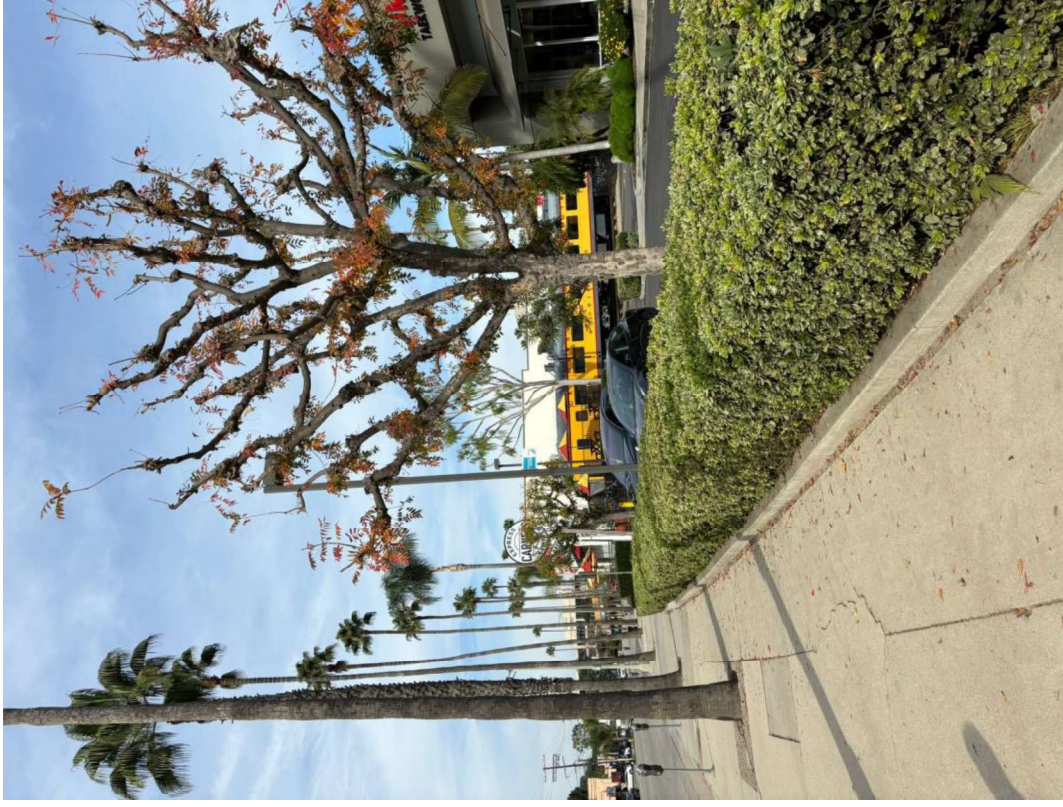
Facing south away from the Project Site on the north side of Ventura Blvd.

33



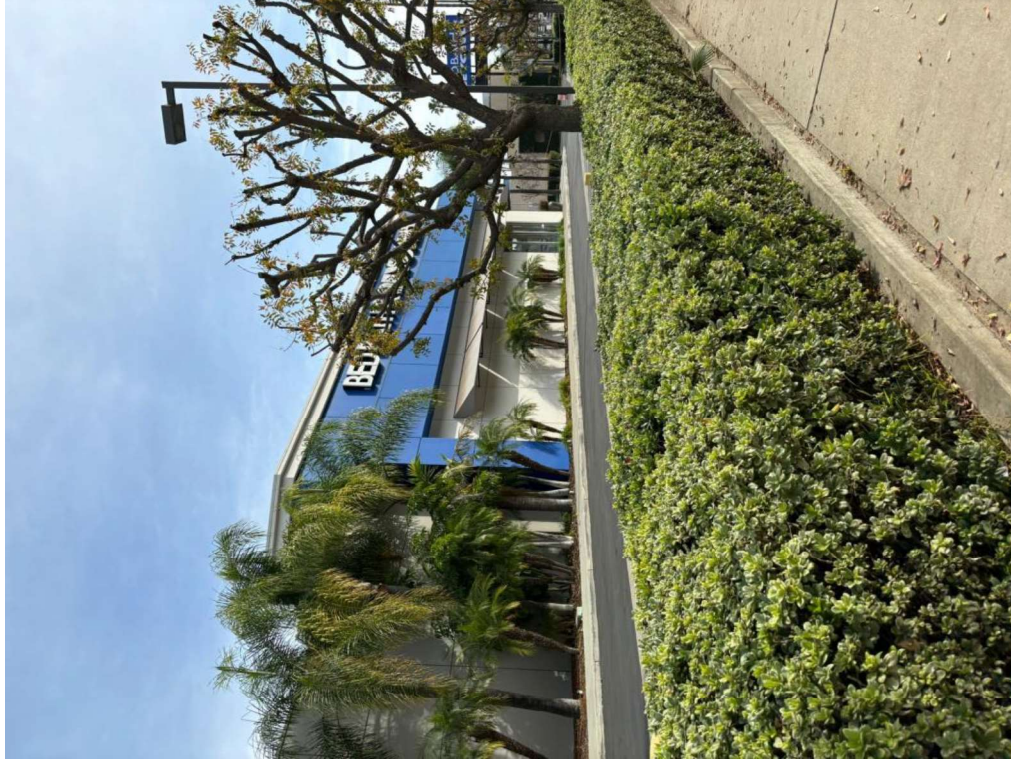
Facing northeast toward the Project Site on the north side of Ventura Blvd.

34



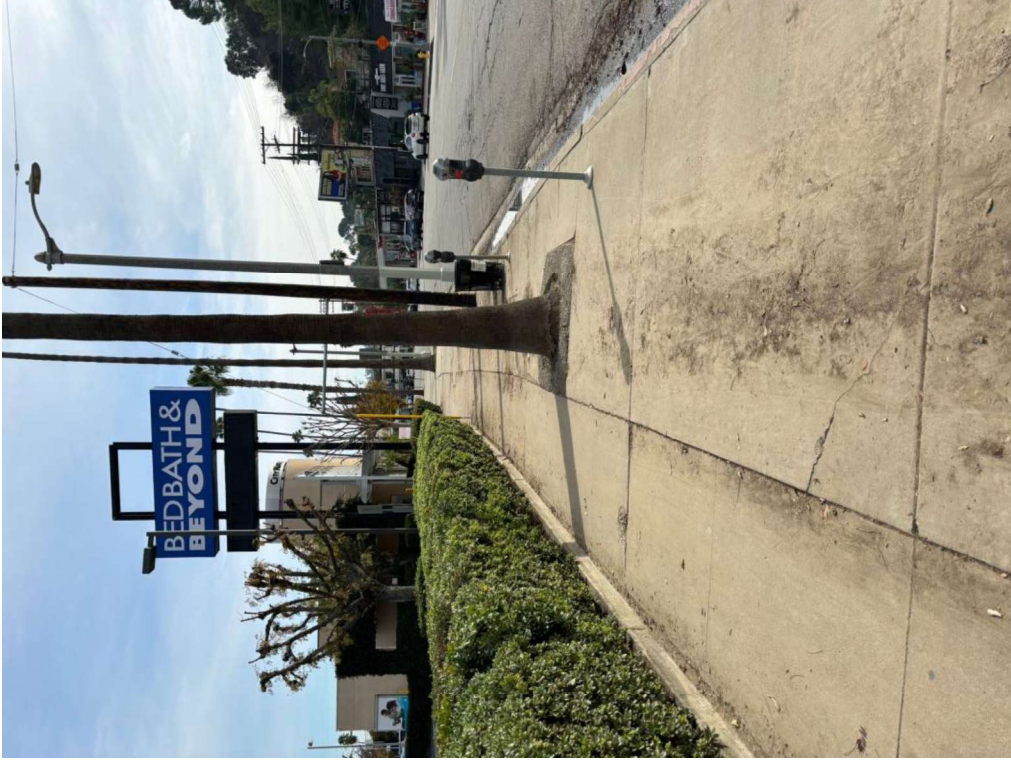
Facing west toward the Project Site on the north side of Ventura Blvd.

35



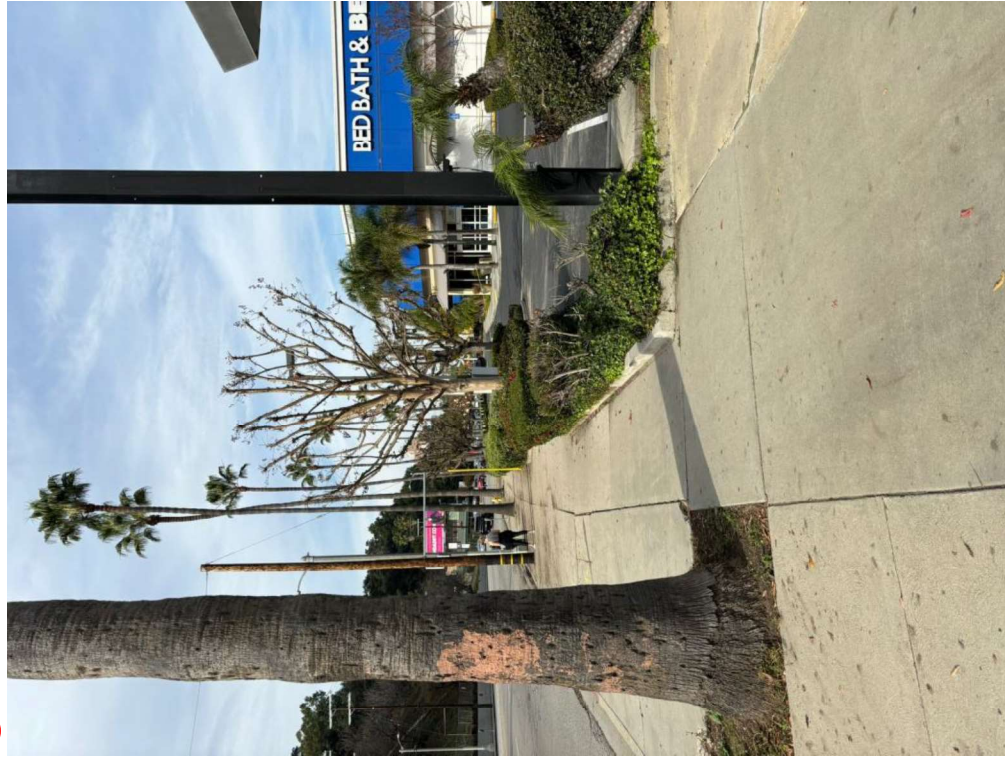
Facing northeast toward the Project Site on the north side of Ventura Blvd.

36



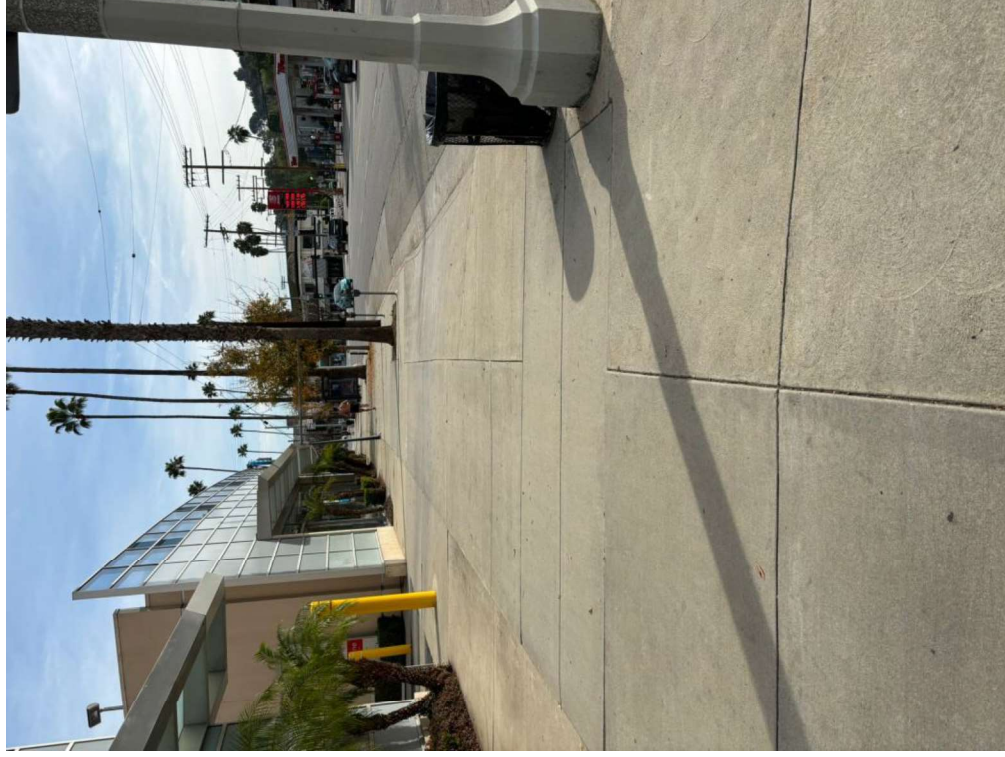
Facing east toward the Project Site on the north side of Ventura Blvd.

37



Facing west toward the Project Site on the north side of Ventura Blvd.

38



Facing east toward the Project Site on the north side of Ventura Blvd.

39



Facing south away from the Project Site on the north side of Ventura Blvd.

40



Facing south away from the Project Site on the north side of Ventura Blvd.

AERIAL PHOTO

Project Site: 12515-12665 W Ventura Blvd. Los Angeles, CA 91604

Project Name: 12555 Ventura



**Appendix I**  
**Tract Map**

## I.1 Purpose

This appendix consolidates the entitlement-record materials related to Vesting Tentative Tract Map No. 84453 (VTT-84453). The map drawing itself is provided as Exhibit I-1; the substantive conditions imposed on tract map approval are documented through the Bureau of Engineering Revised Report and the Los Angeles Fire Department (LAFD) comment letters, which are provided in Appendix C and cross-referenced in this appendix.

## I.2 Tract Map Status

- **Approval and appeal.** The Vesting Tentative Tract Map (VTT-84453) was approved by the Advisory Agency subject to the conditions documented by the Bureau of Engineering and the LAFD. Those documents, together with the tract map drawing (Exhibit I-1), constitute the substantive tract map record available at the date of this report. The Advisory Agency action has been appealed to the Planning Commission, with the appeal hearing pending.
- **Development case.** The Project's discretionary entitlement applications (Vesting Tentative Tract Map appeal, Density Bonus, Conditional Use Permit, and Project Review) are scheduled for Planning Commission action on 11 June 2026. The Letter of Determination and the consolidated conditions of approval for the development case will be issued following Planning Commission action.

## I.3 Substantive Tract Map Conditions (Cross-Reference)

The substantive conditions imposed on the tract map are documented in the following exhibits, provided in Appendix C:

- **Bureau of Engineering Revised Report (1/29/2026):** Engineering conditions, including a 5 ft dedication along Valleyheart Drive; sidewalk improvements on Ventura Boulevard, Whitsett Avenue, and Valleyheart Drive; sewer connections; drainage easements; airspace lot drawings; and ingress/egress easement agreements. See Appendix C, Exhibit C-4.
- **LAFD Inter-Departmental Correspondence — VTT-84453-HCA Fire Comments (11/12/2025):** Fire access conditions including 20 ft fire lane minimum width (28 ft where aerial setup or hydrants), 10% maximum grade, 14 ft vertical clearance, Knox Box per FPB Req. No. 75, hydrants within 300 ft of all structures, no framing prior to roadway installation, building numbering, fire annunciator panel, and other LAFD requirements. See Appendix C, Exhibit C-1.

- **LAFD Inter-Departmental Correspondence — VTT-84453-HCA-REVISED (2/18/2026):** Adds the binding per-phase compliance condition: “The plot plans shall be approved by the Fire Department showing fire hydrants and access for each phase of the project prior to the recording of the final map for that phase. Each phase shall comply independently with code requirements.” See Appendix C, Exhibit C-2.
- **Phasing:** The phased structure of the tract map is documented in the Phasing Exhibit (PL-1TTM01\_PHASE-EXHIBIT\_25-0611, Psomas, dated 6/11/2025), provided as Appendix G, Exhibit G-2.

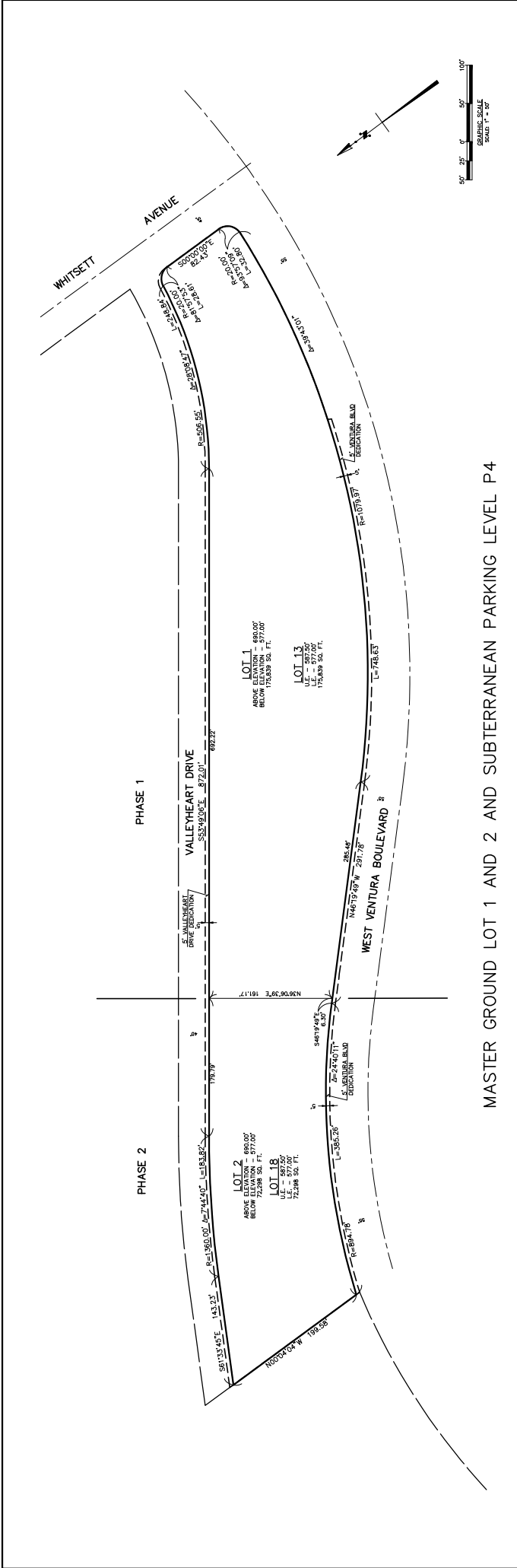
#### **I.4 Substantive Tract Map Record and Pending Planning Commission Action**

The substantive tract map record consists of the Vesting Tentative Tract Map (Exhibit I-1 of this appendix), the Bureau of Engineering Revised Report (Appendix C, Exhibit C-4), and the LAFD comment letters dated 12 November 2025 and 18 February 2026 (Appendix C, Exhibits C-1 and C-2). The Planning Commission’s action on the appeal of the tract map approval, and the Planning Commission’s action on the discretionary entitlement applications for the development case, are scheduled for 11 June 2026 and will produce a consolidated Letter of Determination for the development case. That document, when issued, will be added to this appendix.

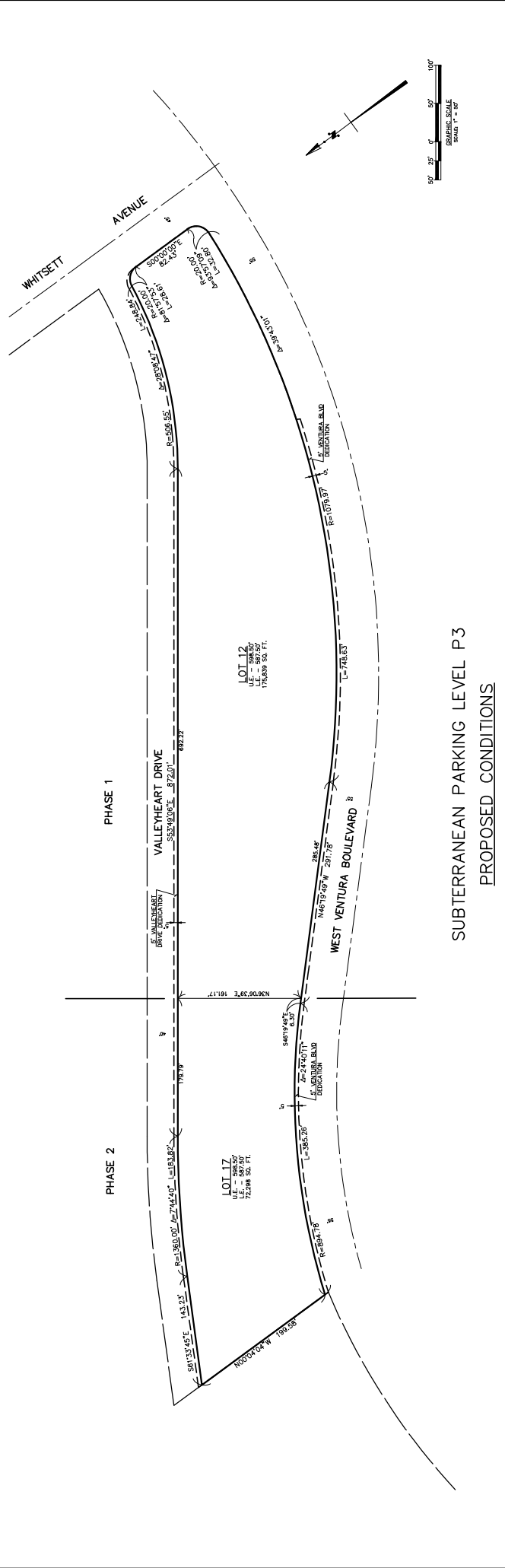
#### **I.5 Exhibit**

- **Exhibit I-1.** Vesting Tentative Tract Map No. 84453 (PL-1TTM Draft, 2025-06-05), prepared by Psomas — the master tract map drawing.





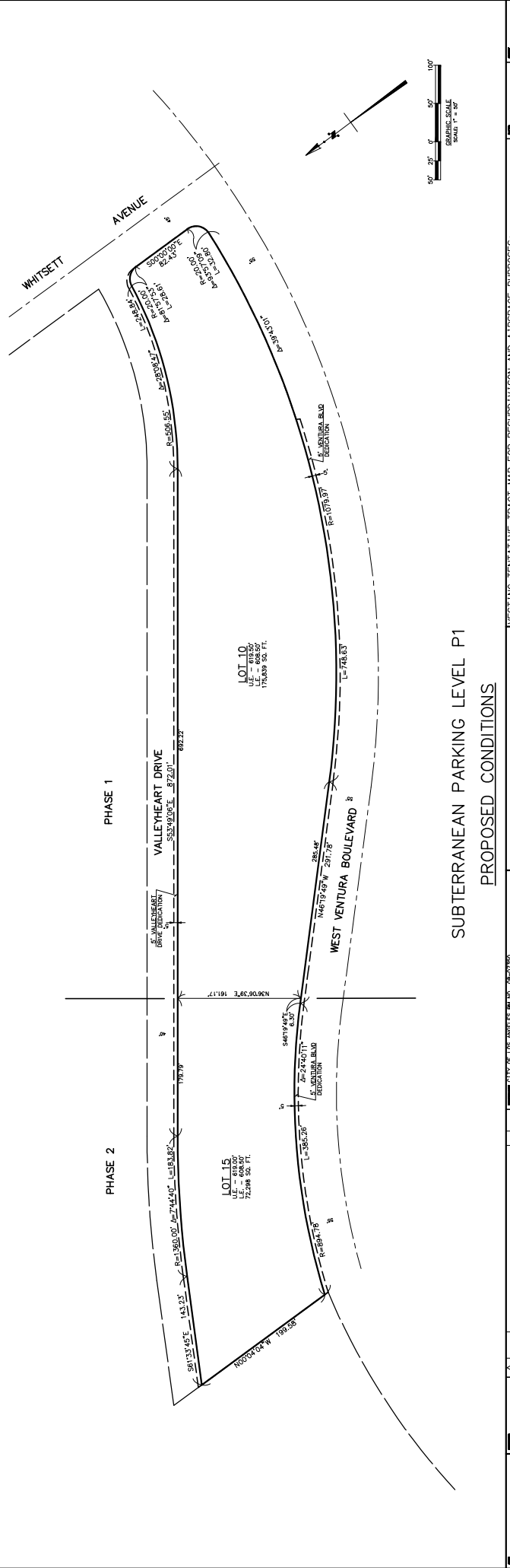
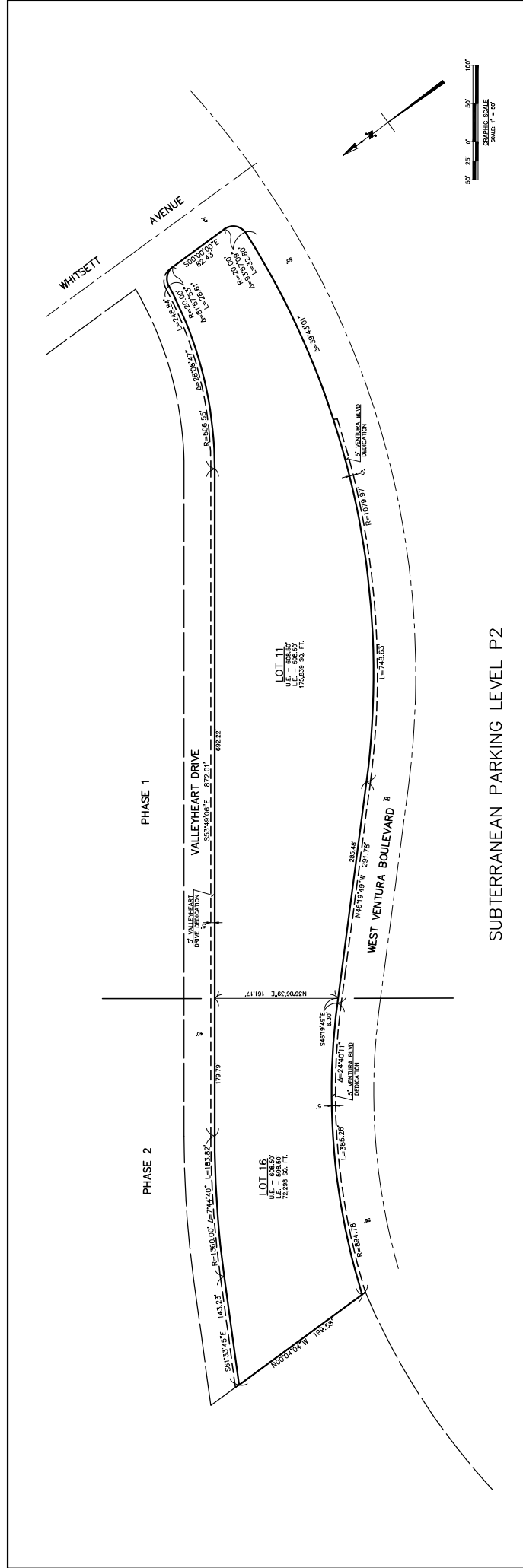
MASTER GROUND LOT 1 AND 2 AND SUBTERRANEAN PARKING LEVEL P4



SUBTERRANEAN PARKING LEVEL P3

PROPOSED CONDITIONS

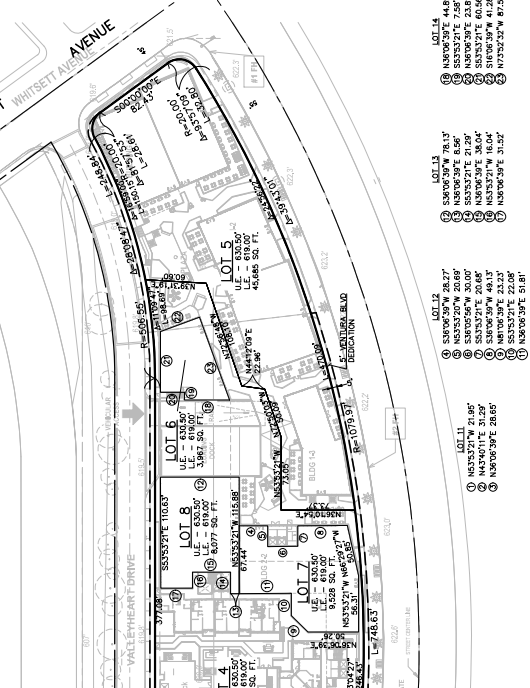
	L.T.L.	CITY OF LOS ANGELES, MAP NO. 08-0385	<b>PSOMAS</b> 618.856.1444 FAX 618.856.1444 12501 - 12665 WEST VENTURA BOULEVARD LOS ANGELES, CA 90047 WWW.PSOMAS.COM	MARCH 28, 2025 1" = 50' 157102100
	L.T.L.	SD. SPR. IN W. CURB WHITSETT AVE. 60FT. N. OF CURB LINE PRODUCED: OF VALLEYHEART DR FROM EAST: S END OF CB 2020		VESTING TENTATIVE TRACT MAP FOR RESUBDIVISION AND AIRSPACE PURPOSES: <b>VESTING TENTATIVE TRACT MAP NO. 84453</b> 12501 - 12665 WEST VENTURA BOULEVARD LOS ANGELES, CA 91604 IN THE CITY OF LOS ANGELES COUNTY OF LOS ANGELES STATE OF CALIFORNIA



**SUBTERRANEAN PARKING LEVEL P1**

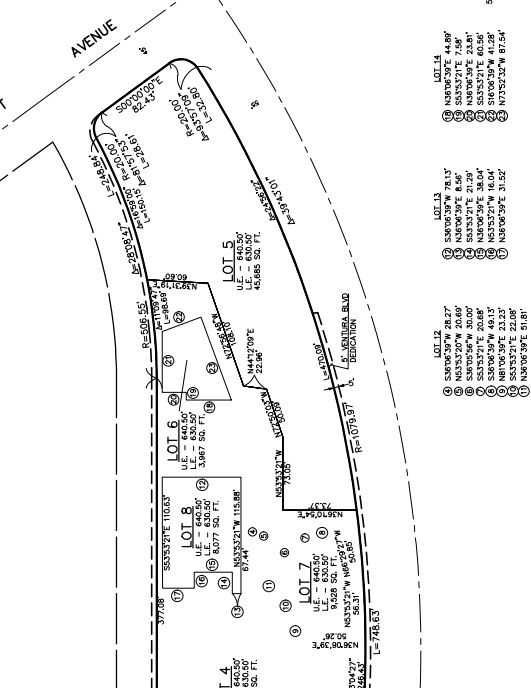
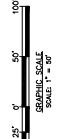
**PROPOSED CONDITIONS**

	L.T.L.	CITY OF LOS ANGELES, DISTRICT NO. 10	PSOMAS 618.956.1444 (fax) 618.956.1444 (cell) 618.956.1444 (home) 618.956.1444 (office) 618.956.1444 (mobile)	VESTING TENTATIVE TRACT MAP FOR RESUBDIVISION AND AIRSPACE PURPOSES: <b>VESTING TENTATIVE TRACT MAP NO. 84453</b> 12501 - 12665 WEST VENTURA BOULEVARD LOS ANGELES, CA 91604	MARCH 28, 2025 1" = 50' 15/10/2010
	L.T.L.	SO. SPK. IN W. CURB WHITSETT AVE. 80FT. N. OF CTR. LINE PRODUCED BY VALLEYHEART DR FROM EAST: S END OF CB 2020		IN THE CITY OF LOS ANGELES COUNTY OF LOS ANGELES STATE OF CALIFORNIA	
D.L.R.					



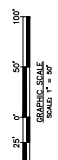
LEVEL 1

- LOT 14  
① N30°03'31" E 44.89'  
② S53°32'17" E 7.58'  
③ S53°32'17" E 60.56'  
④ S16°00'39" W 41.26'  
⑤ N17°32'32" W 81.54'
- LOT 13  
① S30°03'39" W 78.13'  
② N30°03'39" E 8.69'  
③ S53°32'17" E 20.48'  
④ N35°04'39" W 36.04'  
⑤ S53°32'17" E 22.26'  
⑥ N30°03'39" E 51.81'
- LOT 12  
① S30°03'39" W 28.27'  
② N53°32'17" E 20.69'  
③ S53°32'17" E 20.48'  
④ S30°03'39" W 49.13'  
⑤ S53°32'17" E 22.26'  
⑥ N30°03'39" E 51.81'
- LOT 11  
① N35°04'39" W 36.04'  
② N30°03'39" E 28.65'



LEVEL 2

- LOT 14  
① N30°03'31" E 44.89'  
② S53°32'17" E 7.58'  
③ S53°32'17" E 60.56'  
④ S16°00'39" W 41.26'  
⑤ N17°32'32" W 81.54'
- LOT 13  
① S30°03'39" W 78.13'  
② N30°03'39" E 8.69'  
③ S53°32'17" E 20.48'  
④ N35°04'39" W 36.04'  
⑤ S53°32'17" E 22.26'  
⑥ N30°03'39" E 51.81'
- LOT 12  
① S30°03'39" W 28.27'  
② N53°32'17" E 20.69'  
③ S53°32'17" E 20.48'  
④ S30°03'39" W 49.13'  
⑤ S53°32'17" E 22.26'  
⑥ N30°03'39" E 51.81'
- LOT 11  
① N35°04'39" W 36.04'  
② N30°03'39" E 28.65'



**VESTING TENTATIVE TRACT MAP NO. 84453**  
12501 - 12665 WEST VENTURA BOULEVARD  
LOS ANGELES, CA 91604

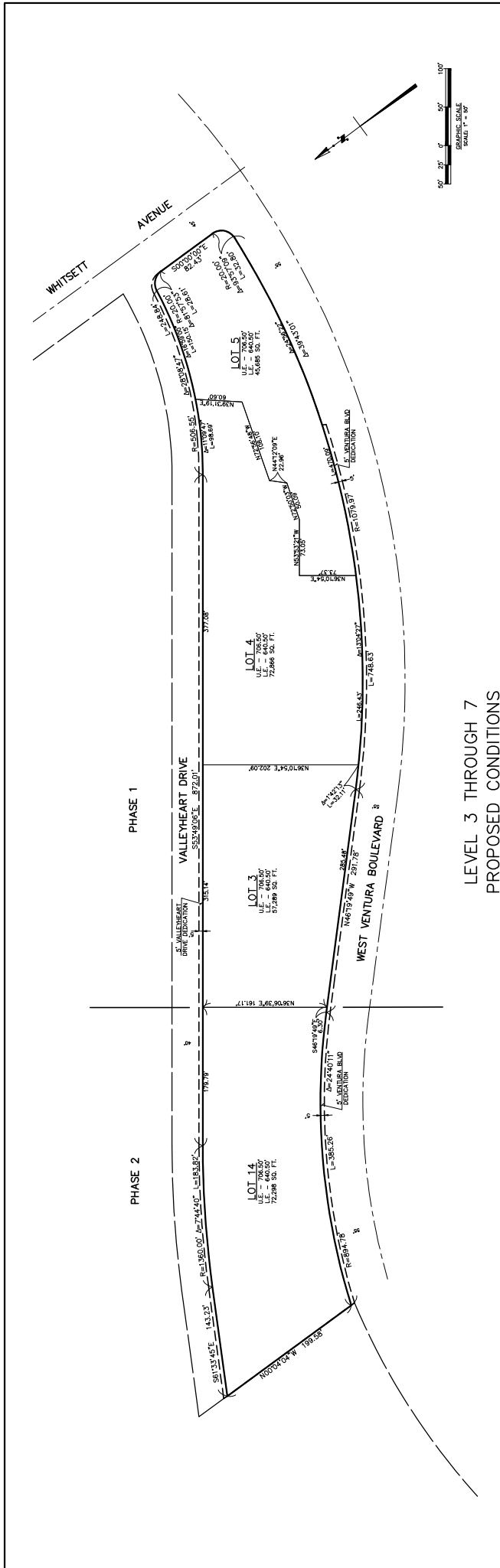
**IN THE CITY OF LOS ANGELES COUNTY OF LOS ANGELES STATE OF CALIFORNIA**

**PSOMAS**  
Professional Surveyors  
Los Angeles, CA 90077, Suite 3020  
(213) 221-1444 fax  
www.psomas.com

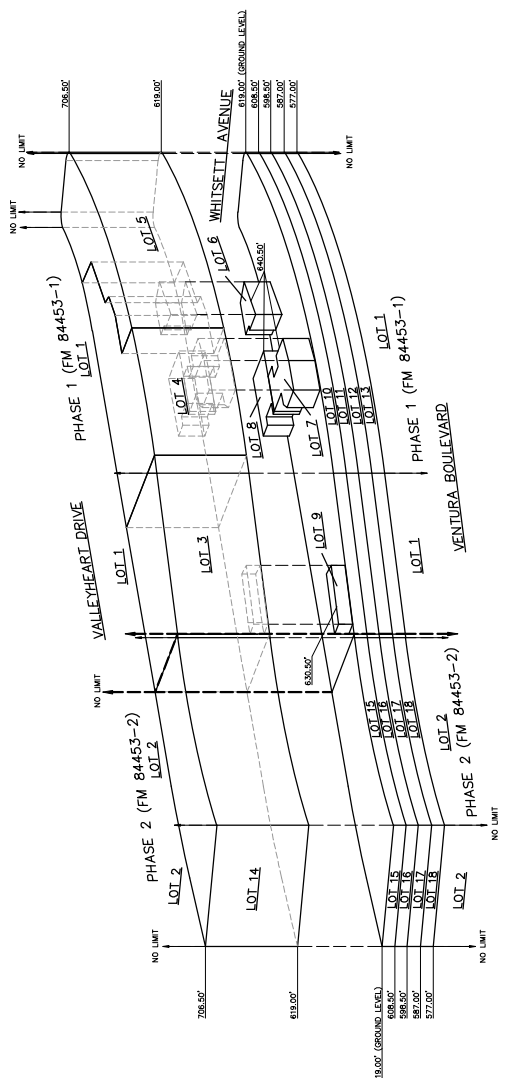
**PROPOSED CONDITIONS**

CITY OF LOS ANGELES MAP NO. 08-0385  
SO. SPK. IN W. CURB WHITSETT AVE. EAST N. OF CR  
LINE PRODUCED BY VALLEYHEART DR FROM  
EAST: S END OF CR  
WEST: 618.956 FEET MAJD. BR. 2000

L.T.L.	L.T.L.	D.L.R.	
1	4	5	157U120100



LEVEL 3 THROUGH 7  
PROPOSED CONDITIONS



ISOMETRIC

PROPOSED LOT INDEX:

- LOT 1 MASTER GROUND LOT
- LOT 2 AIRSPACE LOTS
- LOT 3 RESIDENTIAL
- LOT 4 RESIDENTIAL
- LOT 5 COMMERCIAL
- LOT 6 COMMERCIAL
- LOT 7 COMMERCIAL
- LOT 8 COMMERCIAL
- LOT 9 COMMERCIAL
- LOT 10 SUBTERRANEAN PARKING
- LOT 11 SUBTERRANEAN PARKING
- LOT 12 SUBTERRANEAN PARKING
- LOT 13 SUBTERRANEAN PARKING
- LOT 14 SUBTERRANEAN PARKING
- LOT 15 SUBTERRANEAN PARKING
- LOT 16 SUBTERRANEAN PARKING
- LOT 17 SUBTERRANEAN PARKING
- LOT 18 SUBTERRANEAN PARKING

PROPOSED PHASING INDEX:

- PHASE 1 RESIDENTIAL
- LOT 4 RESIDENTIAL
- LOT 5 COMMERCIAL
- LOT 6 COMMERCIAL
- LOT 7 COMMERCIAL
- LOT 8 COMMERCIAL
- LOT 9 COMMERCIAL
- LOT 10 SUBTERRANEAN PARKING
- LOT 11 SUBTERRANEAN PARKING
- LOT 12 SUBTERRANEAN PARKING
- LOT 13 SUBTERRANEAN PARKING
- PHASE 2
- LOT 14 SUBTERRANEAN PARKING
- LOT 15 SUBTERRANEAN PARKING
- LOT 16 SUBTERRANEAN PARKING
- LOT 17 SUBTERRANEAN PARKING
- LOT 18 SUBTERRANEAN PARKING

	<p>CITY OF LOS ANGELES MAP NO. 08-0355</p> <p>SPR. IN W. CHAS. WHITSETT AVE. (EPT. N. OF CR)</p> <p>LINE PRODUCED BY VALLEY HEART DR FROM</p> <p>EAST: 5 END OF CR</p> <p>DATE: 03.18.2025</p> <p>BY: [Signature]</p>	<p>PSOMAS</p> <p>600 South Main Street, Suite 3020 Los Angeles, CA 90071 (213) 221-1444 fax www.psomas.com</p>	<p>VESTING TENTATIVE TRACT MAP FOR RESUBDIVISION AND AIRSPACE PURPOSES: VESTING TENTATIVE TRACT MAP NO. 84453 12501 - 12665 WEST VENTURA BOULEVARD LOS ANGELES, CA 91604</p>	<p>IN THE CITY OF LOS ANGELES COUNTY OF LOS ANGELES STATE OF CALIFORNIA</p>
	<p>MARCH 20, 2025</p> <p>1" = 50'</p> <p>157102010</p>	<p>5</p>	<p>5</p>	