APPLICATIONS

APPEAL APPLICATION
CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA)
Instructions and Checklist

CEQA APPEAL: ENV-2023-1207-CE-1A

RELATED CODE SECTIONS

The Los Angeles Municipal Code (LAMC) Section 13B.11.F. of Chapter 1A establishes the appeal procedure to the City Council for California Environmental Quality Act (CEQA) determinations.

PURPOSE

A CEQA determination can *only* be appealed if a non-elected, decision-making body (ZA, APC, CPC, DIR) makes a determination for a project that is not further appealable. If a final decision on a project was made by the City Council, either as the initial decisionmaker or on appeal, the related CEQA determination is not appealable.

To initiate appeal of a CEQA appeal, this form must be completed with the required materials attached and filed within 15 calendar days from the final administrative decision of the entitlement application.

GENERAL INFORMATION

Appealable CEQA determinations:

- Certified Environmental Impact Report (EIR)
- Sustainable Communities Environmental Assessment (SCEA)
- Mitigated Negative Declaration (MND)
- Negative Declaration (ND)
- Categorical Exemption (CE)
- Statutory Exemption (SE)

Non-appealable CEQA determinations:

- Addenda to any of the above-listed CEQA determinations
- Findings made pursuant to CEQA Guidelines Section 15162
- An action in which the determination does not constitute a project under CEQA

All CEQA appeals are heard by the City Council. This form is only for appeals related to determinations made by Los Angeles City Planning. All other CEQA appeals shall be filed with the City Clerk pursuant to LAMC Section 197.01.

A Certified Neighborhood Council (CNC) or a person identified as a member of a CNC or as representing the CNC may not file an appeal on behalf of the Neighborhood Council. Persons affiliated with a CNC may only file as an individual on behalf of self.

CASE INFORMATION

Environmental Case Number: ENV-2023-1207-CE

Related Entitlement Case Number(s): ZA-2023-1206-ZAD-DRB-SPP-MSP-HCA-1A

Project Address: 4230 North Saltillo Street

Date of Final Entitlement Determination: March 4, 2026

The CEQA Clearance being appealed is a(n):

☐ EIR ☐ SCEA ☐ MND ☐ ND ☒ CE ☐ SE

APPELLANT

Check all that apply.

☐ Representative ☐ Property Owner ☒ Other Person

☐ Applicant ☐ Operator of the Use/Site

APPELLANT INFORMATION

Appellant Name: Girard Tract Community Preservation

Company/Organization:

Mailing Address: 4224 Saltillo Street

City: Los Angeles **State:** CA **Zip Code:** 91364

Telephone: 818-636-2337 **E-mail:** erok28@gmail.com

Is the appeal being filed on your behalf or on behalf of another party, organization, or company?

☒ Self ☐ Other:

Is the appeal being filed to support the original applicant's position? ☐ **YES** ☒ **NO**

REPRESENTATIVE / AGENT INFORMATION

Representative/Agent Name (if applicable): Jamie T. Hall

Company: Channel Law Group, LLP

Mailing Address: 8383 Wilshire Blvd., Suite 750

City: Beverly Hills **State:** CA **Zip Code:** 90211

Telephone: 310-982-1760 **E-mail:** jamie.hall@channellawgroup.com

JUSTIFICATION / REASON FOR APPEAL

Attach a separate sheet providing the specific reasons for the appeal. The reasons must state how CEQA was incorrectly applied, providing a legal basis for the appeal.

APPLICANT'S AFFIDAVIT

I certify that the statements contained in this application are complete and true.

Appellant Signature: _____ **Date:** March 9, 2026

GENERAL NOTES

A Certified Neighborhood Council (CNC) or a person identified as a member of a CNC or as representing the CNC may not file an appeal on behalf of the Neighborhood Council; persons affiliated with a CNC may only file as an individual on behalf of self.

The appellate body must act on the appeal within a time period specified in the LAMC Section(s) pertaining to the type of appeal being filed. Los Angeles City Planning will make its best efforts to have appeals scheduled prior to the appellate body's last day to act in order to provide due process to the appellant. If the appellate body is unable to come to a consensus or is unable to hear and consider the appeal prior to the last day to act, the appeal is automatically deemed denied, and the original decision will stand. The last day to act as defined in the LAMC may only be extended if formally agreed upon by the applicant.

THIS SECTION FOR CITY PLANNING STAFF USE ONLY

Base Fee: $229 **Date :** 3/10/2026

Reviewed & Accepted by (DSC Planner): Ruben Vasquez

Receipt No.: 200496101552 **Date :** 3/10/2026

Deemed Complete by (Project Planner): _____

ENVIRONMENTAL APPEAL FILING REQUIREMENTS

If dropping off an appeal at a Development Services Center (DSC), the following items are required. See also additional instructions for specific case types. To file online, visit our Online Application System (OAS).

Note: City Clerk prepares the mailing list for CEQA appeals per LAMC Section 11.5.13 E of Chapter 1.

APPEAL DOCUMENTS

1. Hard Copy

Provide three sets (one original, two duplicates) of the listed documents for each appeal filed.

- ☒ Environmental Appeal Application
- ☒ Justification/Reason for Appeal
- ☒ Copies of the written Letter of Determination (LOD), from the final appellate body, which must be a non-elected decision-making body

2. Electronic Copy

- ☒ Provide an electronic copy of the appeal documents on a USB flash drive. The following items must be saved as individual PDFs and labeled accordingly (e.g., "Appeal Form", "Justification/ Reason Statement", or "Original Determination Letter"). No file should exceed 70 MB in size.

3. Appeal Fee

- ☐ *Original Applicant.* The fee charged shall be in accordance with LAMC Section 19.01 B.1(a) (Appeal Fees) of Chapter 1, or LAMC Section 15.1.1F.1.a. (Appeal Fees) of Chapter 1A; or a fee equal to 85% of the original base application fee. Provide a copy of the original application receipt(s) to calculate the fee.
- ☒ *Aggrieved Party.* The fee charged shall be in accordance with the LAMC Section 19.01 B.1(b) (Appeal Fees) of Chapter 1, or LAMC Section 15.1.1F.1.b. (Appeal Fees) of Chapter 1A.

Channel Law Group, LLP

8383 Wilshire Blvd.
Suite 750
Beverly Hills, CA 90211

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

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

*ALSO Admitted in Texas

Writer's Direct Line: (310) 982-1760
jamie.hall@channellawgroup.com

March 9, 2026

VIA ELECTRONIC UPLOAD

City Council of the City of Los Angeles
200 N. Spring Street
Los Angeles, CA 90012

Re: Justification for CEQA Appeal; 4230 N. Saltillo Street; Case Nos.: ZA-2023-1206-ZAD-DRB-SPP-MSP-HCA; ENV-2023-1207-CE ("Project")

Dear Members of the Los Angeles City Council:

This firm represents Girard Tract Community Preservation ("Appellant") regarding the proposed development located at 4230 N. Saltillo Street ("Project"). On March 4, 2026, the South Valley Area Planning Commission ("South Valley APC") issued a Letter of Determination ("LOD") denying our client's appeal and sustaining the Zoning Administrator's determination that the Project is categorically exempt from the California Environmental Quality Act ("CEQA").

Pursuant to Public Resources Code Section 21151(c) and City of Los Angeles Zoning Code Chapter 1A, Section 13B.11.1(F), Appellant hereby appeals the South Valley APC's CEQA determination. This letter synthesizes the arguments previously made in our January 3, 2025 and December 1, 2025 appeal justification letters to demonstrate that the Project is not exempt from CEQA. True and correct copies of the January 3, 2025, and December 1, 2025 appeal justification letters are attached hereto as **Exhibit A** and **Exhibit B**, respectively. Additionally, a copy of the PowerPoint presentation delivered on behalf of Appellant during the South Valley APC hearing is attached hereto as **Exhibit C**.

I. The Project is Precluded from a CEQA Exemption Due to the "Location" Exception Under CEQA Guidelines Section 15300.2(a)

The City asserts that the Project is categorically exempt from CEQA under Article 19, Section 15303, Class 3. However, the Project is entirely ineligible for the "single family home" exemption due to its location within the Santa Monica Mountain Zone ("Zone").

CEQA Guidelines Section 15300.2(a) provides that Class 3 exemptions are qualified by consideration of where the project is to be located, and cannot be used where the project may impact an environmental resource of critical concern that has been designated, precisely mapped, and officially adopted pursuant to law. The Legislature has explicitly declared that the Santa Monica Mountain Zone is a unique environmental resource of critical concern. This Zone was established and mapped by the Legislature via the Santa Monica Mountains Conservancy Act, codified at Public Resources Code Section 33001.

Because the Project is located in this statutorily designated, environmentally sensitive area, the location exception applies. Under these circumstances, Appellant need only demonstrate a "fair argument" that the Project may have a significant effect on the environment in order to require environmental review (*Berkeley Hills Watershed Coalition v. City of Berkeley* (2019) 31 Cal.App.5th 880, 890). As outlined below, the Project will clearly have significant environmental impacts.

II. The Project is Not Exempt from CEQA Due to "Unusual Circumstances" Under CEQA Guidelines Section 15300.2(c)

Even if the location exception did not apply, the Class 3 exemption is precluded by the "unusual circumstances" exception under CEQA Guidelines Section 15300.2(c), which prohibits the use of a categorical exemption when there is a reasonable possibility of a significant effect on the environment due to unusual circumstances.

A. Non-Compliance with State Minimum Fire Safe Regulations

The Project is located within a Very High Fire Hazard Severity Zone ("VHFHSZ"). Because the Project involves an application for a building permit for new construction not relating to an existing structure, it is legally required to comply with the State Minimum Fire Safe Regulations (Cal. Code Regs. tit. 14 § 1270.00 et seq.). It completely fails to do so.

As demonstrated by the expert report prepared by licensed Professional Engineer Brandon Araujo, attached hereto as **Exhibit D**, the Project does not meet the minimum ingress and egress requirements set forth in the Regulations. Specifically, the primary access routes to the Project on Saltillo Street and surrounding roads fail to meet the required 20-foot minimum roadway width dedicated to two-way traffic flow, and multiple street segments exceed the maximum allowable grade of 16 percent.

The Project's blatant non-compliance with critical state fire safety laws intended to protect human life is clear evidence of an "unusual circumstance." Adverse environmental impacts flow directly from this non-compliance. The statutory requirement of a 20-foot-wide roadway is necessary to provide safe, concurrent access for emergency wildfire equipment and civilian evacuation. The failure to meet these standards will cause severe environmental and public safety impacts by creating a bottleneck that traps evacuating residents and impedes first responders during a wildfire emergency.

B. Non-Compliance with Chapter 49 of the California Fire Code

Furthermore, as outlined in the expert Protected Tree Report & Chapter 49 Landscape Compliance Review by accredited tree expert Diana Nicole, M.S., attached hereto as **Exhibit E**, the Project fails to demonstrate compliance with Chapter 49 of the California Fire Code regarding Wildland-Urban Interface Fire Areas. The Project's planting plan lacks essential defensible space documentation, including required crown separation between tree canopies, 10-foot minimum clearances between tree crowns and structures, and vertical separation to avoid ladder-fuels. This is an unusual circumstance under CEQA.

C. Impacts to Coast Live Oak Woodland

Finally, the Project site contains a sensitive environmental resource—a Coast Live Oak Woodland—which the Project will permanently disrupt. The presence of this locally protected species (*Quercus agrifolia*) constitutes an unusual circumstance. The City's tree replacement requirements do not adequately mitigate the permanent loss of this habitat, nor do they account for the temporal loss of individual tree canopy.

III. The Project is Precluded from a CEQA Exemption Due to Cumulative Impacts Under CEQA Guidelines Section 15300.2(b)

CEQA Guidelines Section 15300.2(b) strictly prohibits the use of a categorical exemption when the "cumulative impact of successive projects of the same type in the same place, over time is significant". The Project will contribute to severe cumulative impacts regarding wildfire evacuation and emergency access in the immediate area.

As evidenced in the recent lawsuit filed by the Federation of Hillside and Canyon Associations against the City of Los Angeles (Case No. 25STCP04981), attached hereto as **Exhibit F**, the City maintains an unlawful pattern and practice of approving developments in the VHFHSZ that violate the State Minimum Fire Safe Regulations. The lawsuit meticulously documents over 75 similar projects that the City has recently approved that are entirely non-compliant with these safety regulations. Many of these unlawfully approved projects are located in close proximity to the subject Project.

Additionally, there is a proposed massive development of over 300 housing units at the nearby Woodland Hills Golf Course (Case Nos. CPC-2025-6505-DB-DRB-SPPC-PR-VHCA; VTT-84929-VHCA), located at 4868 North Canoga Avenue and 21150 West Dumetz Road. This massive influx of density is in close proximity to the Project and will direct hundreds of additional vehicles onto the local circulation system during an emergency.

Furthermore, the City is currently considering the approval of yet another project on the very same street, located at 4204 Saltillo Street (Case No. ZA-2025-1911-CU1-MSP-DRB-SPCC). This project is in extremely close proximity to the subject Project site and will add even further strain to a roadway network that is already vastly undersized and non-compliant with fire safety laws.

The combination of the subject Project, the proposed development at 4204 Saltillo Street, the 300+ housing units proposed at the Woodland Hills Golf Course, and the 75+ non-compliant developments recently approved by the City creates a disastrous cumulative impact. Approving yet another project on a substandard, non-compliant hillside street will severely compound the existing dangers, ensuring that future wildfires will spread more rapidly and that evacuations will be fatally hindered.

IV. Conclusion

The Project is located in the Santa Monica Mountain Zone, making it ineligible for a Class 3 exemption due to the "location" exception. Furthermore, the Project does not comply with the State Minimum Fire Safe Regulations or Chapter 49 of the California Fire Code. The Project presents unusual circumstances and threatens to cause significant cumulative environmental impacts. Therefore, the City cannot legally rely on a Class 3 Categorical Exemption. We respectfully request that the City Council grant the appeal, revoke the CEQA clearance, and require the preparation of an appropriate environmental review document.

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

Sincerely,

Jamie T. Hall

Encls.: **Exhibit A** – Appeal Justification Letter dated January 3, 2025
Exhibit B – Supplemental Appeal Justification Letter dated December 1, 2025
Exhibit C – South Valley APC Hearing PowerPoint Presentation
Exhibit D – Expert Report by Brandon Araujo, P.E.
Exhibit E – Protected Tree Report & Chapter 49 Landscape Compliance Review by Diana Nicole, M.S.
Exhibit F – Verified Petition for Writ of Mandate and Complaint for Declaratory and Injunctive Relief (*Federation of Hillside and Canyon Associations, Inc. v. City of Los Angeles*, Case No. 25STCP04981)

Channel Law Group, LLP

March 9, 2026

Justification for CEQA Appeal;
4230 N. Saltillo Street; Case Nos.: ZA-2023-1206-ZAD-DRB-SPP-MSP-HCA; ENV-2023-1207-CE ("Project")

EXHIBIT A

Appeal Justification Letter dated January 3, 2025

Channel Law Group, LLP

8383 Wilshire Blvd.
Suite 750
Beverly Hills, CA 90211

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

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

*ALSO Admitted in Texas

Writer's Direct Line: (310) 982-1760
jamie.hall@channellawgroup.com

January 3, 2025

VIA ELECTRONIC UPLOAD

Los Angeles City Council
200 N. Spring St., Room 395
Los Angeles, CA 9001

Re: Justification Appeal for 4230 N. Saltillo Street ("Project"); Case No.: ZA-2023-1206-ZAD-DRB-SPP-MSP-HCA; ENV-2023-1207-CE

Dear Members of the Area Planning Commission:

This firm represents the Girard Tract Community Preservation ("Association" or "Appellant") with regard to the proposed development located at 4230 N. Saltillo Street ("Project"). The Association was founded to advocate for the preservation of the natural environment and to protect public safety. On December 19, 2024, the Zoning Administrator ("ZA") determined that the Project was exempt from the California Environmental Quality Act ("CEQA") and approved multiple requested entitlements, including a Zoning Administrator Determination, a Girard Tract Project Permit Compliance and Mulholland Scenic Parkway Project Permit Compliance and Design Review (collectively referred to as "Project Approvals"). This letter outlines the justifications for the appeal of the Project Approvals and adoption of a categorical exemption for the Project. Among other reasons, the requested entitlements for the Project cannot be approved because the development does not comply with the "State Minimum Fire Safe Regulations" codified at Cal. Code Regs. tit. 14 § 1270.00 et seq. Additionally, the Project is not exempt from CEQA. Further, the ZA erred when it adopted the findings for the requested Project Approvals. The Association brings this appeal because its members will be directly impacted by the Project.

I. The Project

The Project proposes the construction of a new two-story 1,899 square foot single family home with a 573 square foot 4-car garage, 818 square foot basement, two retaining walls, and a swimming pool. The project is in the Inner Corridor, and subject to the Baseline Hillside Ordinance. The project site is downslope and Visible from the Mulholland Drive right-of-way. The project proposes 726 cubic yards of cut, zero cubic yards of fill, 726 cubic yards of export,

and zero cubic yards of import grading. The project proposes the removal of two Oak trees and one street tree.

The Project requires multiple discretionary entitlements under the Los Angeles Municipal Code ("LAMC"), including the following:

- Pursuant to Los Angeles Municipal Code Sections 12.24.X.28, a Zoning Administrator's Determination to permit the construction, use, and maintenance of a new 1,899 square foot single family home fronting on a Substandard Hillside Limited Street which does not have a 20-foot-wide continuous paved roadway from driveway apron to the boundary of the Hillside Area as required by LAMC Section 12.21 C.10(i)(3).

- Pursuant to LAMC Section 11.5. 7 C, and Section 5 of the Girard Tract (Ordinance No. 165,040), a Girard Tract Project Permit Compliance Review for the construction of a new two-story 1,899 square foot single-family home with an 818 square foot 4-car garage, 573 square foot basement, 2 retaining walls, and a swimming pool.

- Pursuant to LAMC Sections 11.5. 7 C and 16.50, and Section 11 of the Mulholland Scenic Parkway Specific Plan (Ordinance No. 167,943), a Project Permit Compliance and Design Review approval for the construction of a new two-story 1,899 square foot single family home with a 573 square foot 4-car garage, 818 square foot basement, two retaining walls, and a swimming pool.

II. State Minimum Fire Safe Regulations

In 2018, Senate Bill 901 mandated the expansion of the scope of California's regulations regarding minimum fire safety standards to include those lands classified and designated as Very High Fire Hazard Severity Zones ("VHFHSZ"), as defined in subdivision (i) of Government Code § 51177, to include Local Responsibility Areas. In other words, these regulations were extended to those portions of incorporated cities such as the City of Los Angeles that were designated as VHFHSZ. Thereafter, the Board of Forestry adopted implementing regulations. These regulations, known as the "State Minimum Fire Safe Regulations" were adopted in order to protect life and limb during wildfire events after extensive consultation with fire professionals and community members.

As explained below, the Project is located in a designated VHFHSZ, but does not comply with current regulations regarding emergency access and egress in a VHFHSZ. As such, the City cannot approve the requested entitlements to facilitate construction of the Project.

III. The Project Is Located within a Very High Fire Hazard Severity Zone in a Local Responsibility Area

There can be no question that the Project is located within a Very High Fire Hazard Severity Zone. This fact is documented in the City's ZIMAS system as shown below.

Additional	
Airport Hazard	None
Coastal Zone	None
Farmland	Urban and Built-up Land
Urban Agriculture Incentive Zone	No
Very High Fire Hazard Severity Zone	Yes
Fire District No. 1	No
Flood Zone	Outside Flood Zone
Watercourse	No
Methane Hazard Site	None
High Wind Velocity Areas	No
Special Grading Area (BOE Basic Grid Map A-13372)	Yes
Wells	None

Figure 1 – Screenshot from Zimas for 4230 N. Saltillo Street; additional information of hazards

IV. The Project is Subject to the Regulations Because it Requires the Issuance of a "Building Permit for New Construction Not Related to an Existing Structure"

The Project is subject to the State Minimum Fire Safe Regulations. As specified in Section 1270.03(a) of the Regulations, the Regulations shall apply to: "(1) the perimeters and access to all residential, commercial, and industrial Building construction . . . approved after July 1, 2021 within the VHFHSZ . . . "

As further explained in Section 1270.03(c), (a)ffected activities include, but are not limited to, application for a Building permit for ***new construction not relating to an existing structure*** and application for a use permit. See Cal. Code Regs. tit. 14 § 1270.03 (c)(2-3).

The Project clearly involves "new construction not related to an existing structure" and a building permit is required for that new construction. The lot is currently vacant. As such, the State Minimum Fire Regulations are triggered.

V. The Project Does Not Meet the Minimum Roadway Width Requirements Set Forth in the State Minimum Fire Safe Regulations

Article 2 of the State Minimum Fire Safe Regulations, Sections 1273 et seq., addresses Ingress and Egress. The intent of this portion of the Regulations is to require that: "Roads, and Driveways, whether public or private, unless exempted under 14 CCR §1270.03(d) shall provide for safe access for emergency Wildfire equipment and civilian evacuation concurrently, and shall provide unobstructed traffic circulations during a Wildfire emergency consistent with 14 CCR §§1273 through 1273.09. The Project is not eligible for a Section 1270.03 exemption and the Project fails to comply with at least one of the Ingress and Egress Regulations: minimum roadway Width (Section 1273.01).

Section 1273.01(a) requires as follows:

> (a) All roads shall be constructed to provide a minimum of **two** ten (10) foot traffic lanes, not including shoulder and striping. These traffic lanes shall provide for two-way traffic flow to support emergency vehicle and civilian egress, unless other standards are provided in this article or additional requirements are mandated by Local Jurisdictions or local subdivision requirements. Vertical clearances shall conform to the requirements in California Vehicle Code section 35250.

Cal. Code Regs. tit. 14 § 1273.01(a) (emphasis added).

The Letter of Determination issued by the ZA admits that Saltillo Street is less than 20 feet. Page 15 of the Report states as follows: "The proposed project fronts on Saltillo Street, which is a Substandard Hillside Limited Street with right-of-way width of 40 feet and a roadway width of less than 20 feet per the Department of Building and Safety/ Public Works Hillside Referral Form dated August 12, 2022." While the ZA ultimately granted the ZAD to waive the City's 20-foot Contiguous Paved Roadway ("CPR") requirement set forth in the Hillside Ordinance, that does not mean that the Project need not comply with state requirements. It does not.

VI. The City Cannot Make the Required Findings Due to the Project's Inconsistency with State Minimum Fire Safe Regulations

The ZA made certain findings in granting the Project approvals. For example, for the Zoning Administrator's Determination, the ZA that the following findings:

> "The request is in conformity with the public necessity, convenience, general welfare, and good zoning practice and that the action will be in substantial conformance with the various elements and objectives of the General Plan."
>
> "The project will enhance the built environment in the surrounding neighborhood or will perform a function or provide a service that is essential or beneficial to the community, city or region."
>
> "The project's location, size, height, operations and other significant features will be compatible with and will not adversely affect or further degrade adjacent properties, the surrounding neighborhood, or the public health, welfare and safety."
>
> "The request is in conformity with the public necessity, convenience, general welfare, and good zoning practice and that the action will be in substantial conformance with the various elements and objectives of the General Plan."

LOD at Pages 10-13.

However, the City cannot make any of the required findings outlined above because of the Project's inconsistency with the State Minimum Fire Safe Regulations. It is axiomatic that the failure of the Project to conform to critical fire safety regulations intended to protect human lives adversely affects and further degrades adjacent properties, the surrounding neighborhood and the public health, welfare and safety. Moreover, granting an entitlement under these circumstances would not be "beneficial to the community, city or region." And it would certainly not be in "conformity with the public necessity, convenience, general welfare, and good zoning practice" to grant such permits based on a clear inconsistency with state law. Again, the state's regulations were adopted in order to protect life and limb during wildfire events after extensive consultation with fire professionals and community members. The statutory requirements of a 20-foot-wide roadway for the ingress and egress of fire fighters, emergency vehicles and those residents attempting to escape wildfires is necessary for the preservation of life and the safety of emergency personnel. The Project's failure to comply with the State Minimum Fire Safe Regulations necessitates a conclusion that the Project will be detrimental to the public welfare and injurious to others adjacent to or in the vicinity of the subject property.

VII. The City Has Failed to Condition the Project to Ensure Adequate Mitigation for Impacts to an Oak Woodland; Therefore, Project is Not Exempt from CEQA as Class 3 Project

The Project site contains an Oak Woodland. There are 9 oak trees on the project site and the Project will remove 2 of those trees. Oak woodlands are "considered sensitive resources" under CEQA. The City's tree replacement requirements do not replace oak woodland habitat nor account for the temporal loss of individual tree canopy." The permanent loss of habitat for a sensitive resource constitutes a significant effect on the environment due to unusual circumstances. The removal of woodlands results in a permanent loss of habitat and biodiversity because any suitable habitat surrounding will already be occupied and numbers are reduced each time habitat is lost through development. The proposed project's building footprint will forever remove habitat – the replacement of individual trees does not negate the loss of habitat. The City's CEQA Thresholds Guide ("Guide") supports the conclusion that a "reduction of existing habitat" will have a significant effect on the environment. The Guide states that "[a] project would normally have a significant impact on biological resources if it could result in . . . The loss of individuals or the reduction of existing habitat of a locally designated species or a reduction in a locally designated natural habitat or plant community.". There is no question that the Project will result in the permanent reduction of habitat for a locally designated species – the Coast Live Oak. Mitigation in the form of replacement trees alone does not replace Oak woodland habitat nor account for the temporal loss of individual tree canopy. Successful restorations of Oak Woodlands are extremely rare. It is relatively easy to plant oak trees, but the extensive ecological conditions and soils that make a forest from those trees have been thus far almost impossible to recreate in any short or medium timeframe. For these reasons, attempts to recreate these woodlands as mitigation for other developments are most often unsuccessful. Moreover, planting a boxed tree from a nursery does not mitigate the loss of both terrestrial and soil fauna and plant life that are part of an existing plant community.

The loss of temporal canopy and Oak woodland habitat will also have a significant effect on the wildlife that utilize the property. There is a strong relationship between oaks generally and wildlife. An oft-cited figure reports that 320 species of vertebrates and 5,000 species of insects are associated with oak woodlands. Id. These totals make Oak woodlands the richest overall wildlife habitats in California, and rank among the top three habitats for birds.

Oak woodlands are threatened by fire suppression, overgrazing, urban development, and disease. It is for this reason that the destruction of Oak woodlands constitutes a significant environmental impact. Replacing individual trees but not habitat area is ineffective. Because the proposed project would reduce the habitat area on the site considerably, it will have a resulting impact on the number of species supported by the site. Of the rich complement of oak woodland bird species, some will be eliminated from the site as a result of the Project and the replacement plantings of trees will be insufficient mitigation because they do not replace the area lost. It is a fallacy to imagine that wildlife at a development site will simply move to a new area after development. This is false because suitable surrounding habitat will already be occupied. Wildlife numbers are reduced each time habitat is lost through development.

Petitioner has met its burden under *Berkeley Hillside Preservation v. City of Berkeley*. The Project ***will*** have significant effect on the environment and the ZA's conclusions otherwise are not supported by substantial evidence.

VIII. The Project is in the Santa Monica Mountain Zone, a Sensitive Environmental Area of Concern and a Class 3 Categorical Exemption Cannot Be Used

The City asserts that the Project is categorically exempt from CEQA under Article III, Section 1, Class 3, Category 1 (new construction of small structures – single family residences not in conjunction with the building of two or more units). However, the Project is not eligible for the "single family home" exemption because of its location in the Santa Monica Mountain Zone ("Zone"). The Legislature has declared that the Zone is an environmental resource of critical concern. The Zone was established by the Legislature via the Santa Monica Mountains Conservancy Act, which is codified at Section 33001 of the Public Resources Code. Under these circumstances (where a project may impact on an environmental resource of critical concern by impacting an Oak Woodland as explained above) a party need only demonstrate a "fair argument" that a project may have significant effect on the environment. This standard of review was outlined in *Berkeley Hills Watershed Coalition v. City of Berkeley* (2019) 31 Cal.App.5th 880. The court stated that once it is determined that a project is located in an environmentally sensitive area the "fair argument" standard of review applies. *Berkeley Hills Watershed Coalition v. City of Berkeley* (2019) 31 Cal.App.5th 880, 890.

There should be no doubt that the Santa Monica Mountains Zone comprise an environmental resource of critical concern. In adopting the Santa Monica Mountains Conservancy Act ("Act"), the Legislature declared as follows:

> "The Legislature hereby finds and declares that the Santa Monica Mountains Zone, as defined in Section 33105, is a unique and valuable economic, environmental, agricultural,

> scientific, educational, and recreational resource that should be held in trust for present and future generations; that, as the last large undeveloped area contiguous to the shoreline within the greater Los Angeles metropolitan region, comprised of Los Angeles and Ventura Counties, it provides essential relief from the urban environment; that it exists as a single ecosystem in which changes that affect one part may also affect all other parts; and that the preservation and protection of this resource is in the public interest."

Pub. Res. Code Section 33001.

As noted in *Berkeley Hills Watershed Coalition*, a "resource" is a "natural source of wealth or revenue," or a "natural feature or phenomenon that enhances the quality of human life." *Berkeley Hills Watershed Coalition v. City of Berkeley* (2019) 31 Cal.App.5th 880, 891. The Legislature's explicit findings regarding the characteristics of the Zone in the Santa Monica Mountains Conservancy Act more than meet this definitional requirement.

An objector need only demonstrate a "fair argument" that the project "may impact" the mapped resource. *Id.* at 894. Stated another way, if a lead agency is presented with a fair argument that a project may have a significant effect on the environment, the lead agency shall prepare an Environmental Impact Report ("EIR") even though it may also be presented with other substantial evidence that the project will not have a significant effect. *No Oil, Inc. v. City of Los Angeles* (1974) 13 Cal.3d 68.

A strong presumption in favor of requiring preparation of an EIR is built into CEQA. Again, under the "fair argument" standard an agency must prepare an EIR whenever substantial evidence in the record supports a fair argument that a project may have a significant effect on the environment. *No Oil, Inc. v. City of Los Angeles* (1974) 13 Cal.3d 68, 75, 82; *Friends of "B" St. v. City of Haywood* (1980) 106 Cal.App.3d 988, 1002. This standard sets a "low threshold" for preparation of an EIR. *Pocket Protectors v. City of Sacramento* (2004) 124 Cal.App.4th 903, 928.

In sum, the use of the Class 3 single-family home exemption cannot be used for this project because it is located within the Santa Monica Mountains Zone. Environmental review pursuant to CEQA is required because the mountains are an *environmental resource of critical concern* that have been designed and precisely mapped pursuant to state law.

IX. The Project is Not Exempt from CEQA as a Class 3 Activity Due to Unusual Circumstances

The Class 3 exemption is also not available due to "unusual circumstances." Application of the so-called "single family home exemption" is limited by the factors described in section 15300.2." An exemption should be denied if one of the exceptions listed in section 15300.2 of the Guidelines applies. Section 15300.2, subdivision (c), of the Guidelines provides for one such exception and states that if there is a "reasonable possibility" of a "significant effect on the environment due to unusual circumstances," then the categorical exception cannot apply. A "circumstance is 'unusual' . . . judged relative to the typical circumstances related to an

otherwise typically exempt project." *Voices for Rural Living v. El Dorado Irr. Dist.* (2012) 209 Cal.App.4th 1096, 1108–09.

a. <u>The Presence of a Coast Live Oak Woodland is an Unusual Circumstance</u>

As pointed out by the California Supreme Court in the *Berkeley Hillside Preservation* case:

> "A party invoking the exception may establish an unusual circumstance without evidence of an environmental effect, by showing that the project has some feature that distinguishes it from others in the exempt class, such as its size or location. In such a case, to render the exception applicable, the party need only show a reasonable possibility of a significant effect due to that unusual circumstance."
>
> *Berkeley Hillside Pres.*, *supra*, 60 Cal.4th at p. 1105.

The California Supreme Court, in *Berkeley Hillside Preservation*, continued its analysis:

> Alternatively, under our reading of the guideline, a party may establish an unusual circumstance with evidence that the project will have a significant environmental effect. That evidence, if convincing, necessarily also establishes "a reasonable possibility that the activity will have significant effect on the environment due to unusual circumstances."
>
> *Berkeley Hillside Pres.*, *supra*, 60 Cal.4th at p. 1105

Thus, if it can be shown, as is the case here, that the Project will have a significant effect on the environment, that alone is sufficient to eliminate the applicability of the categorical exemption.

Policy 3 of Section 6 of the Conservation Element of the General Plan (Endangered Species) states as follows:

> "Policy 3: continue to support legislation that encourages and facilitates protection of endangered, threatened, sensitive and rare species and their habitats and habitat corridors."

Policy 4 of the Habitats portion of the Conservation Element of the General Plan states:

> "Policy 4: continue to support legislation that encourages and facilitates protection of local native plant and animal habitats."

Here, the unusual circumstances is the existence of an Coast Live Oak Woodland (*Qeurcus agrifolia*) on the site which the Project would negatively impact. This tree is a locally protected species. The City Council's findings and the implementing City's official CEQA Thresholds Guide quoted above constitute an authorized and definitive legislative finding that this particular project's special circumstances would have a significant impact on biological resources.

The City's official CEQA Thresholds Guide states:

> A project would normally have a significant impact on biological resources if it could result in:
>
> • The loss of individuals, or the reduction of existing habitat, of a state or federal listed endangered, threatened, rare, protected, or candidate species, or a Species of Special Concern or federally listed critical habitat;
>
> • The loss of individuals or the reduction of existing habitat of a *locally designated species* or a reduction in a locally designated natural habitat or plant community;

It is clear that this is a parallel to the definition of a "sensitive biological resource" found in that same document:

> For the purposes of the Thresholds Guide, a sensitive biological resource is defined as follows:
>
> - A plant or animal that is currently listed by a state or federal agency(ies) as endangered, threatened, rare, protected, sensitive or a Species of Special Concern or federally listed critical habitat;
>
> - A plant or animal that is currently listed by a state or federal agency(ies) as a candidate species or proposed for state or federal listing; or
>
> - A *locally designated or recognized species* or habitat.

The quoted statement from the CEQA Thresholds Guide above, in combination with the definition of a sensitive biological resource and the requirement that the description of the environmental setting include a "statement of the potential for existing sensitive resources, *based*

upon review of Exhibit C-7" make it clear that the trees in question are a sensitive resource in the City of Los Angeles and that, therefore, the presumption is that the Project *will* have a significant impact on biological resources. This certainly meets the required showing that there is "a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances" as required by *Berkeley Hillside Pres.*, *supra*, 60 Cal.4th at p. 1105.

X. The City Owes a Duty to Consult with CDFW and Failed to Do So

The California Department of Fish and Widlife is a trustee agency and the City owes a duty to consult with and notify CDFW. Per California Code of Regulations § 15386, a trustee agency "*means a state agency having jurisdiction by law over natural resources affected by a project which are held in trust for the people of the State of California. Trustee agencies include: (a) The California Department of Fish and Game with regard to the fish and wildlife of the state, to designated rare or endangered native plants, and to game refuges, ecological reserves, and other areas administered by the department.*" There is no question that the Project will impact an Oak Woodland by removing two oak trees within a grove of nine oak trees. CDFW clearly has jurisdiction over these natural resources and the City failed to consult with CDFW to determine whether replacement trees *alone* would adequately mitigate impacts to a woodland (they do not). The City has a duty to consult with CDFW. Public Resources Code Section 21080.3 states as follows: "Prior to determining whether a negative declaration or environmental impact report is required for a project, the lead agency shall consult with all responsible agencies and trustee agencies."

The City cannot claim there are no significant impacts and use this as a basis not to consult with or notify a trustee agency. This was decided in *Gentry v. Murrieta* (1995) 36 Cal.App.4th 1359, 1387. ("We conclude that natural resources can be "affected by" a project, and hence the lead agency may have duties toward "trustee agencies," *even if the lead agency believes the project will have no significant effect on the environment*. This broad construction of "trustee agency" serves the statutory purpose of fostering interagency consultation. Potential trustee agencies should have input at an early stage in the process into the question of whether the project affects resources within their jurisdiction, and hence into the very question of whether they are, in fact, trustee agencies.). As explained above, the mitigation measures proposed by the City (namely, replacement trees at a 4:1 ratio) are insufficient to mitigate the impacts to an Oak Woodland.

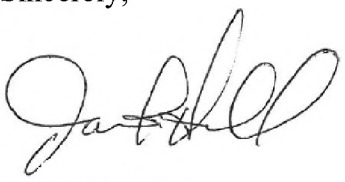
XI. Conclusion

The Project does not comply with the State Minimum Fire Safe Regulations because Saltillo Street is less than 20 feet wide. This Project is also subject to the State Minimum Fire Regulations because it's located in a VHFHSZ and requires a "building permit for new construction not relating to an existing structure." As a result of the Project's inconsistency with these regulations, the ZA erred in making its findings to grant the requested entitlements on December 19, 2024 and approve the Project.

Additionally, the Project is not exempt from CEQA because the Project ***will*** have a significant effect on the environment. Among other things, the City has failed to apply the appropriate mitigation for impacts to an Oak Woodland. Further, the Project is located in an environmentally sensitive location and therefore is not eligible for categorical exemption pursuant to CEQA Guidelines Section 15300.2(a). Finally, the City has failed to engage in the required consultation with trustee agencies, including CDFW.

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

Sincerely,



Jamie T. Hall

Channel Law Group, LLP

March 9, 2026

Justification for CEQA Appeal;
4230 N. Saltillo Street; Case Nos.: ZA-2023-1206-ZAD-DRB-SPP-MSP-HCA; ENV-2023-1207-CE ("Project")

EXHIBIT B

Supplemental Appeal Justification Letter dated December 1, 2025

Channel Law Group, LLP

8383 Wilshire Blvd.
Suite 750
Beverly Hills, CA 90211

Phone: (310) 347-0050
www.channellawgroup.com

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

*ALSO Admitted in Texas

Writer's Direct Line: (310) 982-1760
jamie.hall@channellawgroup.com

December 1, 2025

VIA ELECTRONIC MAIL

South Valley Area Planning Commission
200 N. Spring St., Room 395
Los Angeles, CA 90012
tiffany.corrales@lacity.org
apcsouthvalley@lacity.org

Re: Supplemental Appeal Justification Letter for 4230 N. Saltillo Street ("Project"); Case No.: ZA-2023-1206-ZAD-DRB-SPP-MSP-HCA; ENV-2023-1207-CE

Dear Members of the South Valley Area Planning Commission:

This firm represents Girard Tract Community Preservation ("Association" or "Appellant") with regard to the proposed development located at 4230 N. Saltillo Street ("Project"). This letter supplements the bases for appeal submitted by Appellant on January 3, 2025.

I. Non-Compliance with State Minimum Fire Safe Regulations and Los Angeles Municipal Code Section 57.4908

Appellant explained in its original appeal justification letter that the Project does not comply with the State Minimum Fire Safe Regulations (and consequently with LAMC Section 57.4908). These regulations were adopted by the Board of Forestry in order to protect life and limb during wildfire events after extensive consultation with fire professionals and community members.

Appellant contends that the City cannot make the required findings for approval of the requested entitlements because of the Project's inconsistency with the State Minimum Fire Safe Regulations. It is axiomatic that the failure of the Project to conform to critical fire safety regulations intended to protect human lives adversely affects and further degrades adjacent properties, the surrounding neighborhood and the public health, welfare, and safety.

While the City has already admitted that the Project does not meet the 20-foot roadway requirement in the Hillside Ordinance, Appellant has commissioned an expert report from a licensed Professional Engineer, Brandon Araujo, which confirms that the Project does not meet the requirements in the State Minimum Fire Safe Regulations. Moreover, the City has not conditioned the Project to provide for alternative measures that provide for the "same practical effect." This expert report is attached hereto as **Exhibit A**. Mr. Araujo's report concludes:

> "[A]ccess to the Project does not comply with the Regulations and, consequently, the Project does not comply with LAMC Section 57.4908."

II. Non-Compliance with Chapter 49 of the California Fire Code, Los Angeles Fire Code Section 57.4906.5.2 and Reliance on Inadequate Documents to Confirm CEQA Compliance

Appellant has also commissioned a Protected Tree Report and Chapter 49 Landscape Compliance Review by Diana Nicole, an accredited ecological horticulture professional and tree expert. Ms. Nicole opines as follows: (1) The Record relied on unscaled, "reduce" Tree Survey Maps that are not measurable, (2) The Protected Tree Report is outdated and cannot serve as the appropriate CEQA baseline, and (3) The Landscape Plan does not demonstrate compliance with Chapter 49 of the California Fire Code[1]. This report is attached hereto as **Exhibit B**. Because of these non-compliance issues, the City cannot make the required findings for the requested entitlements, and the appeal should be granted.

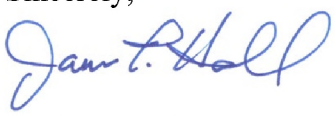
III. Submission of Internal Agency Communications Pursuant Public Resources Code

Finally, attached as **Exhibit C** are internal agency communications produced by the City pursuant to a Public Records Act Request. Appellant is submitting these documents to the Area Planning Commission for inclusion in the Record pursuant to PRC 21167.6(e)(10)(B)(iii).

IV. Conclusion

The Project does not comply with critical fire safety regulations nor comply with the California Environmental Quality Act. As such, the required findings for the requested entitlements cannot be made in the affirmative and the appeal should be granted.

Sincerely,



Jamie T. Hall

[1] Chapter 49 of the California Fire Code may be accessed at https://up.codes/viewer/california/ca-fire-code-2022/chapter/49/requirements-for-wildland-urban-interface-fire-areas#49. The City has adopted the California Fire Code with certain exceptions and modifications not applicable here. See LAMC Section 57.4901.

South Valley Area Planning Commission
4230 N. Saltillo Street
December 1, 2025

EXHIBIT A

December 1, 2025 Project Number 25-03

Attention: Jamie Hall
Channel Law Group
8383 Wilshire Boulevard, Suite 750
Beverly Hills, CA 90211

SUBJECT: State Minimum Fire Safe Regulations Ingress and Egress Requirements and 4320 Saltillo Street

Dear Mr. Hall,

Pursuant to your request, I have performed a field investigation of roadway access to the proposed development project at 4320 Saltillo Street ("Project") with respect to the State Minimum Fire Safe Regulations ("Regulations"), specifically as they pertain to Article 2, Ingress and Egress, and Los Angeles Municipal Code ("LAMC") Section 57.4908 and document any deficiencies. This report presents the findings of my investigation.

EXECUTIVE SUMMARY

The Project is located in the central region of the City of Los Angeles ("City") in the San Fernando Valley. Channel Law Group has hired Brandon Araujo, a professional Civil Engineer registered in the State of California, to conduct a field investigation of roadway access to the Project and prepare a report as to whether roadway access meets the requirements as set forth in California Code of Regulations, Title 14 Natural Resources, Division 1.5 – Department of Forestry and Fire Protection, Chapter 7 – Fire Protection, Subchapter 2 – State Minimum Fire Safe Regulations, Article 2 – Ingress and Egress and incorporated in LAMC Section 57.4908.

Upon completion of his field investigation, Mr. Araujo determined that roadway access to the Project does not meet the Regulations with respect to width and grade and, as such, the Project does not comply with the LAMC Section 57.4908.

See **Exhibit 1, Overview of Roadway Deficiencies,** for an overview of the deficiencies documented in this report. This exhibit, and all other exhibits referenced in this report, can be found in **Attachment 1**.

BACKGROUND

The Project (APN 2172-023-053) is located in the San Fernando Valley region of the City. See **Exhibit 1** for an overview of the location of Project. The Project is located in a designated Very High Fire Hazard Severity Zone.

Channel Law Group hired Brandon Araujo, P.E. to conduct a field investigation and evaluate access to the Project with respect to Article 2, Ingress and Egress, of the Regulations and document any instances where roadway access did not meet the standards set forth therein. The text of the Regulations, as provided by the State of California's Office of Administrative Law, can be found in **Attachment 2**.

PROFESSIONAL CREDENTIALS

Mr. Araujo is a professional Civil Engineer registered in the State of California and has been licensed since January 2010. He has extensive experience reviewing street improvement plans prepared for the public right-of-way and evaluating them based on established standards. He also has extensive experience performing field investigations of public roadway facilities to document existing roadway geometric and/or traffic deficiencies and verifying their compliance with approved plans or established standards. See **Attachment 3** for his resume.

METHODOLOGY

Mr. Araujo conducted a field investigation in a manner consistent with the level of care and skill exercised by members of his profession currently practicing under similar conditions in the Southern California area. His investigation took place on Saturday, April 12, 2025 and Sunday, November 23, 2025. Distances less than 25 feet were measured with a measuring tape, distances greater than 25 feet were measured with a measuring wheel along the ground, and grades were measured with a digital level. Per Section 1270.08, Distance Measurements, of the Regulations "all specified or referenced distances are measured along the ground, unless otherwise stated." Mr. Araujo evaluated six access routes to the Project with respect to the Regulations:

1) Southbound Saltillo Street via Canoga Avenue
2) Southbound Saltillo Street via Rios Street
3) Southbound Saltillo Street via Castillo Street
4) Las Pilas Road via Castillo Street
5) Northbound Saltillo Street via Golondrina Street
6) Northbound Saltillo Street via Mulholland Drive

See **Exhibit 2** for an overview of each access route evaluated.

FINDINGS

Existing Conditions

Below you will find a summary of each of the existing conditions of the roads evaluated in the access routes listed above. Mr. Araujo observed low traffic volumes traveling in both directions of travel at speeds varying from 10 to 25 miles per hour. Unless otherwise noted, all roads are paved with asphalt concrete and serve motor vehicles driving to and from single family residential homes.

Saltillo Street

Saltillo Street's northern terminus is located at the intersection of Canoga Avenue and Saltillo Street. Saltillo Street's southern terminus is located at the intersection of Mulholland Drive and Saltillo Street.

The segment of Saltillo Street from Canoga Avenue to Rios Street ("Segment 1") measures approximately 860 feet long. Saltillo Street lacks curb and gutter along this segment on both sides of the road. Its width, as measured from edge of pavement to edge of pavement, varies from 12 feet and 6 inches to 19 feet. There are no regulatory signs installed prohibiting stopping or parking facing southbound traffic. No Parking Any Time signs are installed facing northbound traffic along the northern portion of this roadway approaching Canoga Avenue.

The segment of Saltillo Street from Rios Street to Castillo Street ("Segment 2") measures approximately 840 feet long. While much of Saltillo Street along this segment lacks curb and gutter on both sides of the road, some properties do feature curb and gutter along their frontages (e.g. 4372 Saltillo Street, 4378 Saltillo Street, etc.) Its width, as measured from edge of pavement to edge of pavement or from curb face to curb face, if applicable, is approximately 20 feet. There are no regulatory signs installed prohibiting stopping or parking in the southbound direction. No Parking Any Time signs are installed facing northbound traffic along this entire segment of Saltillo Street.

The segment of Saltillo Street from Castillo Street to Las Pilas Road ("Segment 3") measures approximately 590 feet long. It features asphalt curbs on both sides of the road aside from the frontage along 4320 Saltillo Street which lacks an asphalt curb. Its width, as measured from curb face to curb face, is approximately 20 feet. There are no regulatory signs installed prohibiting stopping or parking in either the south- or northbound directions.

The segment of Saltillo Street from Las Pilas Road to Golondrina Street ("Segment 4") measures approximately 250 feet long. It lacks curb and gutter on both sides of the road. Its width, as measured from edge of pavement to edge of pavement varies from 14 feet to 16 feet and 8 inches. No Parking Any Time signs are installed facing traffic in both the south- or northbound directions.

The segment of Saltillo Street from Golondrina Street to Escondido Street (North) ("Segment 5"), measures approximately 520 feet long. It lacks curb and gutter on both sides of the road. Its width, as measured from curb face to curb face, varies from 16 feet to 20 feet. No Parking signs are installed facing southbound traffic along this entire segment. There are no regulatory signs installed prohibiting stopping or parking in the northbound direction.

The segment of Saltillo Street from Escondido Street (North) to Mulholland Drive ("Segment 6"), measures approximately 750 feet long. It features curb on gutter on both sides of the road. Its width, as measured from curb face to curb face, is approximately 24 feet. There are no regulatory signs installed prohibiting stopping or parking in either the south- or northbound directions.

Rios Street

Rios Street's western terminus is located at the intersection of Canoga Avenue and Rios Street. Rios Street's eastern terminus is located at the intersection of Rios Street and Saltillo Street.

Rios Street lacks a gutter along much of its length on both sides of the road. Its width, as measured from curb face to curb face, measures less than 24 feet. There are no regulatory signs installed prohibiting stopping or parking facing eastbound traffic. No Parking Any Time signs are installed facing westbound traffic.

Castillo Street

Castillo Street's western terminus is located at the intersection of Canoga Avenue and Castillo Street. Castillo Street's eastern terminus is located at the intersection of Castillo Street and Saltillo Street.

Castillo Street lacks a gutter along much of its length on both sides of the road. Its width, as measured from curb face to curb face, measures approximately 20 feet. No Parking Any Time signs are installed facing eastbound traffic. There are no regulatory signs installed prohibiting stopping or parking facing westbound traffic.

Las Pilas Road

Las Pilas Road's western terminus is located at the intersection of Castillo Street and Las Pilas Road. Las Pilas Road's eastern terminus is located at the intersection of Las Pilas Road and Saltillo Street.

Las Pilas Road lacks a gutter along much of its length on both sides of the road. Its width, as measured from curb face to curb face, measures 16 to 18 feet. No Parking Any Time signs are installed facing both directions of traffic.

Golondrina Street, from Canoga Avenue to Saltillo Street

This segment of Golondrina Street's western terminus is located at the intersection of Canoga Avenue and Golondrina Street. The eastern terminus of this segment is located at the intersection of Golondrina Street and Saltillo Street.

Golondrina Street, from Canoga Avenue to Saltillo Street, lacks a gutter along much of its length on both sides of the road. Its width, as measured from curb face to curb face, measures approximately 18 feet. No Parking Any Time signs are installed facing both directions of traffic.

Facility Determinations

Article 2 of the Regulations refers to three different types of facilities: driveways, one-way roads, and two-way roads.

Section 1270.01(i) of the Regulations defines a "driveway" as follows: "A vehicular pathway that serves no more than four (4) Residential Units and any number of non-commercial or non-industrial Utility or Miscellaneous Group U Buildings on each parcel. A Driveway shall not serve commercial or industrial uses at any size or scale." A "road," on the other hand, is defined in Section 1270.01(y) as follows: "A public or private vehicular pathway to more than four (4) Residential Units, or to any industrial or commercial Occupancy."

Since the five roadways evaluated (i.e. Saltillo Street, Rios Street, Castillo Street, Las Pilas Road, and Golondrina Street) are public vehicular pathways to more than four (4) Residential Units based on my personal observations and review of the number of homes utilizing the City's Zone Information and Map Access System ("ZIMAS"), they cannot be considered driveways as defined by the Regulations.

For all five roadways evaluated, traffic control signs are installed facing both directions of traffic consistent with a two-way road. In addition, since there are no traffic signs nor pavement

markings nor physical barriers prohibiting or discouraging motor vehicle travel in either direction, none of the five roadways can be considered a one-way road.

Since all five roadways are public vehicular pathways to more than four residential units and serve traffic in the both directions, each was evaluated based on the Regulations' requirements for a two-way road.

Types of Deficiencies

In my evaluation, I found two types of deficiencies: deficiencies with respect to the Regulations' requirements for road width and road grade. The requirements for a two-way road are found in Section 1273.01(a) of the Regulations. Section 1273.01(a) states:

> All roads shall be constructed to provide a minimum of two ten (10) foot traffic lanes, not including shoulder and striping. These traffic lanes shall provide for two-way traffic flow to support emergency vehicle and civilian egress, unless other standards are provided in this article or additional requirements are mandated by Local Jurisdictions or local subdivision requirements.

The requirements for grade are found in Section 1273.03 of the Regulations. Section 1273.03 states:

> (a) At no point shall the grade for all Roads and Driveways exceed 16 percent.
> (b) The grade may exceed 16%, not to exceed 20%, with approval from the Local Jurisdiction and with mitigations to provide for Same Practical Effect.[1]"

//

//

//

//

[1] Same Practical Effect is defined in Section 1270.1 of the Regulations:

> As used in this subchapter, means an Exception or alternative with the capability of applying accepted wildland fire suppression strategies and tactics, and provisions for fire fighter safety, including:
> (1) access for emergency wildland fire equipment,
> (2) safe civilian evacuation,
> (3) signing that avoids delays in emergency equipment response,
> (4) available and accessible water to effectively attack Wildfire or defend a Structure from Wildfire, and
> (5) fuel modification sufficient for civilian and fire fighter safety.

ACCESS ROUTE DEFICIENCIES

Access Route 1: Southbound Saltillo Street via Canoga Avenue

Segment 1 of Saltillo Street varies in width from 12 and a half feet to 16 and a half feet. The amount of width provided along this segment is less than the 20 feet required. See **Exhibit 3.1** for a photograph of this segment of Saltillo Street looking westward.

Segment 2 of Saltillo Street measures approximately 20 feet in width. However, parking is permitted in the southbound direction. The presence of parked vehicles reduces the available road width to traffic by 8 feet. Hence, the amount of width provided along this segment is less than the 20 feet required. See **Exhibit 3.2** for a photograph of this segment of Saltillo Street looking southward.

Segment 3 of Saltillo Street measures approximately 20 feet in width. However, parking is permitted in the both the south- and northbound directions. The presence of parked vehicles reduces the available road width to traffic by 8 feet. Hence, the amount of width provided along this segment is less than the 20 feet required. See **Exhibit 3.3** for a photograph of this segment of Saltillo Street looking southward.

Since this access route does not provide a minimum of two ten (10) foot traffic lanes that provide for two-way traffic flow to support emergency vehicle and civilian egress, this access route does not meet the Regulations' requirements with respect to width and, consequently, does not comply with LAMC Section 57.4908.

Access Route 2: Southbound Saltillo Street via Rios Street

As stated above, while Segments 2 and 3 of Saltillo Street measure approximately 20 feet in width, the presence of parked vehicles along either of these segments reduces the available roadway by 8 feet.

Rios Street measures approximately 24 feet in width. However, parking is permitted in the eastbound direction of travel (along the south side of the road). The presence of parked vehicles reduces the available road width to traffic by 8 feet. Hence, the amount of width provided along Rios Street is less than the 20 feet required. See **Exhibit 3.4** for a photograph of this segment of Rios Street looking westward.

Since this access route does not provide a minimum of two ten (10) foot traffic lanes that provide for two-way traffic flow to support emergency vehicle and civilian egress, this access route does

not meet the Regulations' requirements with respect to width and, consequently, does not comply with LAMC Section 57.4908.

Access Route 3: Southbound Saltillo Street via Castillo Street

As stated under Access Route 1, while Segment 3 of Saltillo Street measure approximately 20 feet in width, the presence of parked vehicles reduces the available roadway by 8 feet.

Castillo Street measures approximately 20 feet in width. However, parking is permitted in the westbound direction of travel (along the north side of the road). The presence of parked vehicles reduces the available road width to traffic by 8 feet. Hence, the amount of width provided along Castillo Street is less than the 20 feet required. See **Exhibit 3.5** for a photograph of this segment of Castillo Street looking westward.

Since this access route does not provide a minimum of two ten (10) foot traffic lanes that provide for two-way traffic flow to support emergency vehicle and civilian egress, this access route does not meet the Regulations' requirements with respect to width and, consequently, does not comply with LAMC Section 57.4908

Access Route 4: Las Pilas Road via Castillo Street

Las Pilas Road varies in width from 16 feet to 18 feet. The amount of width provided along this segment is less than the 20 feet required. See **Exhibit 3.6** for a photograph of Las Pilas Road looking westward.

Furthermore, during the field investigation, Las Pilas Road was found to have a grade in excess of 16 percent at two locations: one location is found near the intersection of Las Pilas Road and Castillo Street, the second location is found in front of 21318 Las Pilas Road. Photographs showing the grade in excess of 16 percent at these locations are provided in **Exhibits 3.7** and **3.8**, respectively.

Since Las Pilas Road does not provide a minimum of two ten (10) foot traffic lanes that provide for two-way traffic flow to support emergency vehicle and civilian egress and its grade exceeds the 16 percent without any evidence of the City providing mitigation for Same Practical Effect, this access route does not meet the Regulations' requirements with respect to width and grade and, consequently, does not comply with LAMC Section 57.4908

Access Route 5: Northbound Saltillo Street via Golondrina Street

Segment 4 of Saltillo Street varies in width from 14 feet to 18 feet. The amount of width provided along this segment is less than the 20 feet required. See **Exhibit 3.9** for a photograph of this segment of Saltillo Street looking southward.

Golondrina Street measures approximately 18 feet in width. The amount of width provided along this segment is less than the 20 feet required. See **Exhibit 3.10** for a photograph of Golondrina Street looking eastward.

Since this access route does not provide a minimum of two ten (10) foot traffic lanes that provide for two-way traffic flow to support emergency vehicle and civilian egress, this access route does not meet the Regulations' requirements with respect to width and, consequently, does not comply with LAMC Section 57.4908.

Access Route 6: Northbound Saltillo Street via Mulholland Drive

Segment 6 of Saltillo Street measures approximately 24 feet in width. However, parking is permitted in the both the north- and southbound directions. The presence of parked vehicles reduces the available road width to traffic by 8 feet. Hence, the amount of width provided along this segment is less than the 20 feet required. See **Exhibit 3.11** for a photograph of this segment of Saltillo Street looking southbound.

Segment 5 of Saltillo Street measures up to 20 feet in width. The frontage in front of 4170 Saltillo Street is approximately 16 feet wide. See **Exhibit 3.12** for a photograph of Saltillo Street in front of 4170 Saltillo Street looking southward. The remainder of Segment 5 north of 4170 Saltillo Street is approximately 20 feet wide, but the presence of parking reduces the amount of width provided along this segment to less than the 20 feet required.

Since this access route does not provide a minimum of two ten (10) foot traffic lanes that provide for two-way traffic flow to support emergency vehicle and civilian egress, this access route does not meet the Regulations' requirements with respect to width and, consequently, does not comply with LAMC Section 57.4908.

//

//

//

CONCLUSION

Access to the Project does not comply with the State Minimum Fire Safe Regulations as they pertain to Article 2, Ingress and Egress.

Specifically, access to the Project via southbound Saltillo Street via Canoga Avenue does not comply since the width of Segment 1 of Saltillo Street is less than 20 feet and the presence of parking on Segments 2 and 3 limits the width of roadway dedicated to two-way traffic flow to less than 20 feet.

Access to the Project via southbound Saltillo Street via Rios Street does not comply since the presence of parking on Saltillo Street and Rios Street limits the width of the roadway dedicated to two-way traffic flow to less than 20 feet.

Access to the Project via southbound Saltillo Street via Castillo Street does not comply since the presence of parking on Saltillo Street and Castillo Street limits the width of the roadway dedicated to two-way traffic flow to less than 20 feet.

Access to the Project via Las Pilas Road via Castillo Street does not comply since the presence of parking on Castillo Street limits the width of the roadway dedicated to two-way traffic flow to less than 20 feet, the width of Las Pilas Road is less than 20 feet, and the grade of Las Pilas Road exceeds 16 percent in multiple locations without any evidence of the City providing mitigations to provide for Same Practical Effect

Access to the Project via northbound Saltillo Street via Golondrina Street does not comply since the width of Golondrina Street is less than 20 feet and the width of a segment of Saltillo Street south of the project is less than 20 feet.

Access to the Project via northbound Saltillo Street via Mulholland Drive does not comply with the Regulations since multiple segments of Saltillo Street north of Escondido Street (North) have a width of less than 20 feet and the presence of parking on Saltillo Street from Escondido Street (North) to Mulholland Drive limits the width of the roadway dedicated to two-way traffic flow to less than 20 feet.

Each of the six routes to the Project do not meet the Regulations requirements with respect to Ingress and Egress. Moreover, I have reviewed the Letter of Determination issued by the City on December 19, 2024, and do not see any special conditions imposed by the City to provide the "Same Practical Effect" as defined in Section 1270.1 of the Regulations. Therefore, access to the Project does not comply with the Regulations and, consequently, the Project does not comply with LAMC Section 57.4908.

If you have any further questions, please let me know.

Sincerely,



Brandon Araujo, P.E.
R.C.E 75996

Attachments

1) Exhibits
2) State Minimum Fire Safe Regulations, Article 2, Ingress and Egress
3) Brandon Araujo's Resume

ATTACHMENT 1

EXHIBITS

Exhibit 1

Overview of Roadway Deficiencies

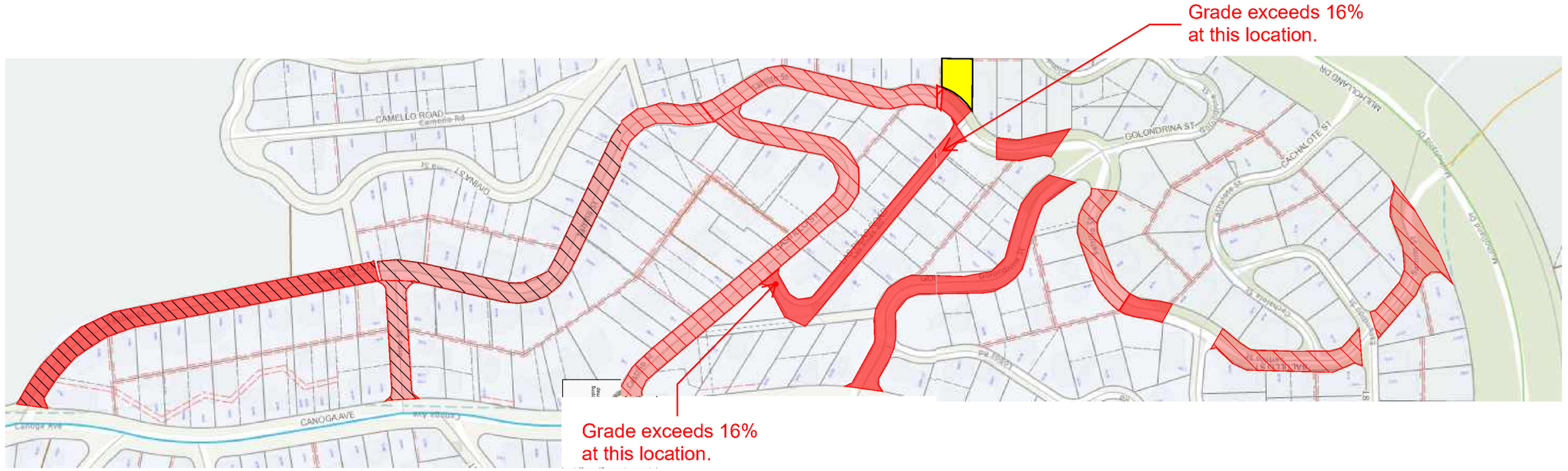


Exhibit 1 - Overview of Roadway Deficiencies

Exhibit 2

Overview of Access Routes

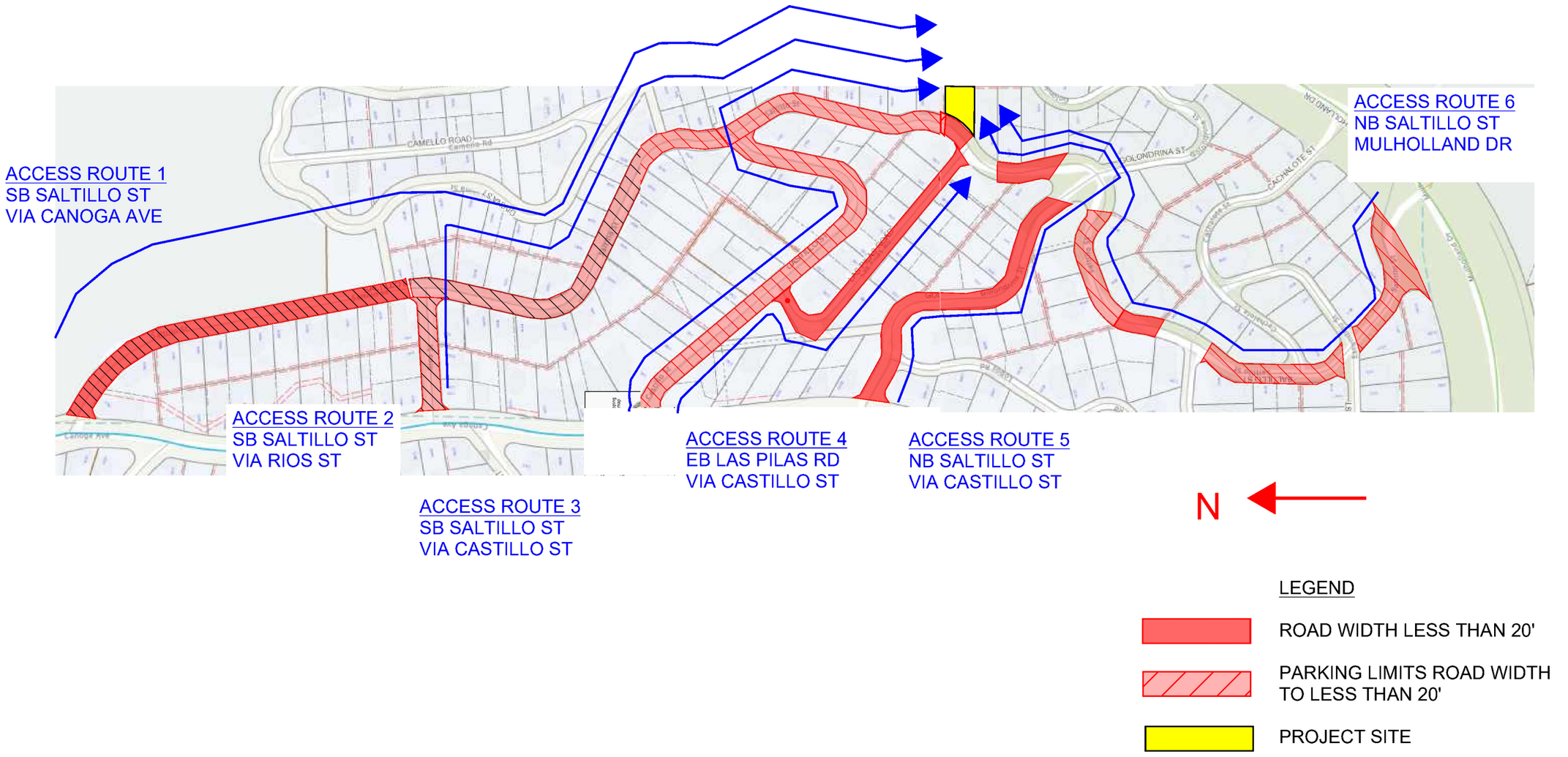


Exhibit 2 - Overview of Access Routes

Exhibit 3.1

Photograph of Saltillo Street – Segment 1 Looking Westward



Exhibit 3.1: Photograph of Saltillo Street – Segment 1 Looking Westward

Exhibit 3.2

Photograph of Saltillo Street – Segment 2 Looking Southward



Exhibit 3.2: Photograph of Saltillo Street – Segment 2 Looking Southward

Exhibit 3.3

Photograph of Saltillo Street – Segment 3 Looking Southward



Exhibit 3.3: Photograph of Saltillo Street – Segment 3 Looking Southward

Exhibit 3.4

Photograph of Rios Street Looking Westward



Exhibit 3.4: Photograph of Rios Street Looking Westward

Exhibit 3.5

Photograph of Castillo Street Looking Westward



Exhibit 3.5: Photograph of Castillo Street Looking Westward

Exhibit 3.6

Photograph of Las Pilas Road Looking Westward



Exhibit 3.6: Photograph of Las Pilas Road Looking Westward

Exhibit 3.7

Photograph of Digital Level on Las Pilas Road Near Its Intersection with Castillo Street



Exhibit 3.7: Photograph of Digital Level on Las Pilas Road Near Its Intersection with Castillo Street

Exhibit 3.8

Photograph of Digital Level In Front of 21318 Las Pilas Road



Exhibit 3.8: Photograph of Digital Level In Front of 21318 Las Pilas Road

Exhibit 3.9

Photograph of Saltillo Street - Segment 4 Looking Southward

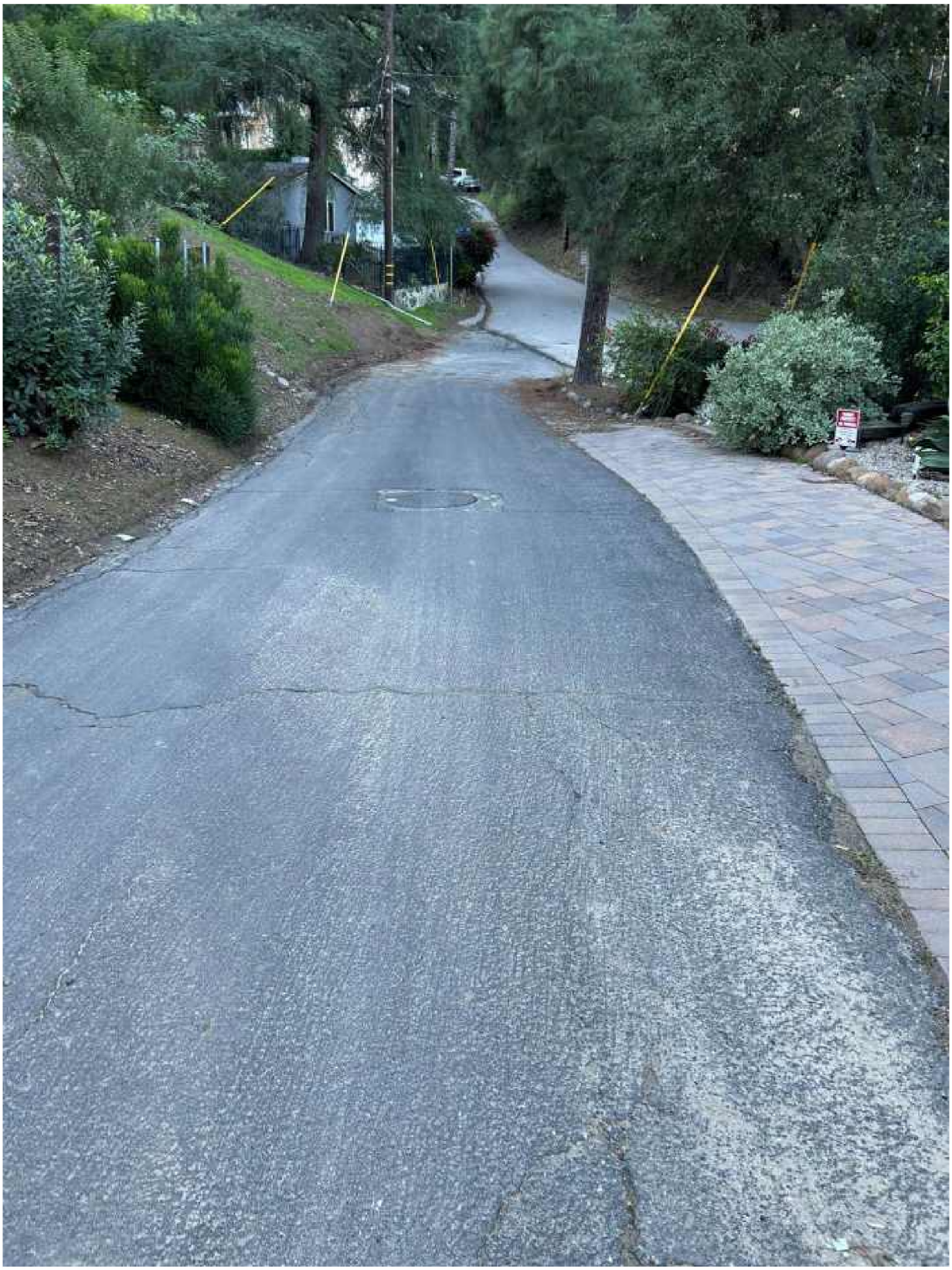


Exhibit 3.9: Photograph of Saltillo Street – Segment 4 Looking Southward

Exhibit 3.10

Photograph of Golondrina Street Looking Eastward

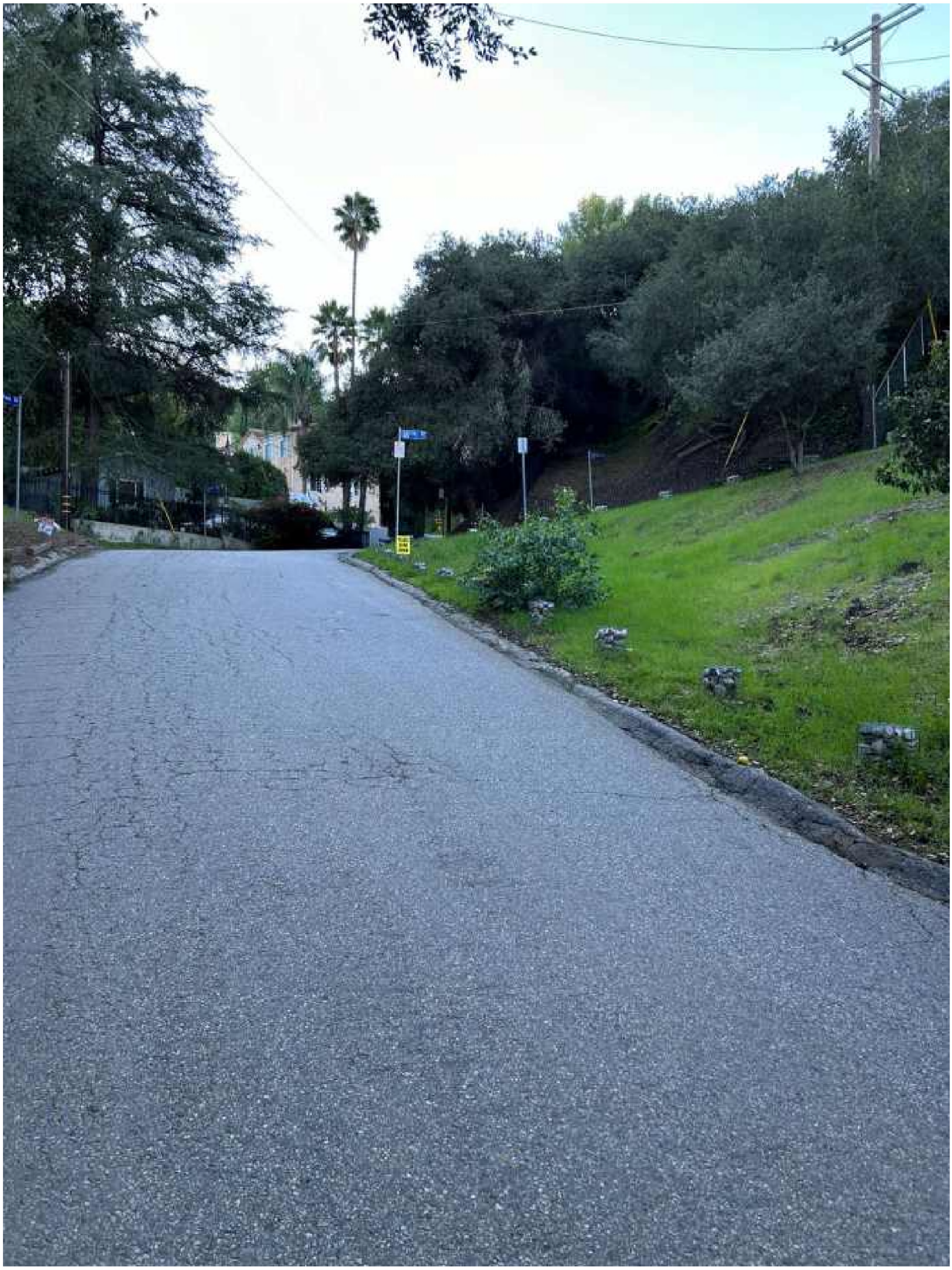


Exhibit 3.10: Photograph of Golondrina Street Looking Eastward

Exhibit 3.11

Photograph of Saltillo Street – Segment 6 Looking Southbound



Exhibit 3.11: Photograph of Saltillo Street – Segment 6 Looking Southbound

Exhibit 3.12

Photograph of Saltillo Street In Front of 4170 Saltillo Street Looking Southward



Exhibit 3.12: Photograph of Saltillo Street In Front of 4170 Saltillo Street Looking Southward

ATTACHMENT 2

State Minimum Fire Safe Regulations
Article 2, Ingress and Egress

California Code of Regulations
Title 14 Natural Resources
Division 1.5 – Department of Forestry and Fire Protection
Chapter 7 – Fire Protection
Subchapter 2 – State Minimum Fire Safe Regulations
Article 2 – Ingress and Egress
§ 1273.00 - Intent
§ 1273.01 - Width
§ 1273.02 - Road Surface
§ 1273.03 - Grades
§ 1273.04 - Radius
§ 1273.05 - Turnarounds
§ 1273.06 - Turnouts
§ 1273.07 - Road and Driveway Structures
§ 1273.08 - Dead-End Roads
§ 1273.09 - Gate Entrances

§ 1273.00 - Intent
Roads, and Driveways, whether public or private, unless exempted under 14 CCR § 1270.03(d), shall provide for safe access for emergency Wildfire equipment and civilian evacuation concurrently, and shall provide unobstructed traffic circulation during a Wildfire emergency consistent with 14 CCR §§ 1273.00 through 1273.09.

§ 1273.01 - Width
(a) All roads shall be constructed to provide a minimum of two ten (10) foot traffic lanes, not including shoulder and striping. These traffic lanes shall provide for two-way traffic flow to support emergency vehicle and civilian egress, unless other standards are provided in this article or additional requirements are mandated by Local Jurisdictions or local subdivision requirements. Vertical clearances shall conform to the requirements in California Vehicle Code section 35250.
(b) All One-way Roads shall be constructed to provide a minimum of one twelve (12) foot traffic lane, not including Shoulders. The Local Jurisdiction may approve One-way Roads.
(1) All one-way roads shall, at both ends, connect to a road with two traffic lanes providing for travel in different directions, and shall provide access to an area currently zoned for no more than ten (10) Residential Units.
(2) In no case shall a One-way Road exceed 2,640 feet in length. A turnout shall be placed and constructed at approximately the midpoint of each One-way Road.
(c) All driveways shall be constructed to provide a minimum of one (1) ten (10) foot traffic lane, fourteen (14) feet unobstructed horizontal clearance, and unobstructed vertical clearance of thirteen feet, six inches (13' 6").

§ 1273.02 - Road Surface
(a) Roads shall be designed and maintained to support the imposed load of Fire Apparatus weighing at least 75,000 pounds, and provide an aggregate base.
(b) Road and Driveway Structures shall be designed and maintained to support at least 40,000 pounds.
(c) Project proponent shall provide engineering specifications to support design, if requested by the Local Jurisdiction.

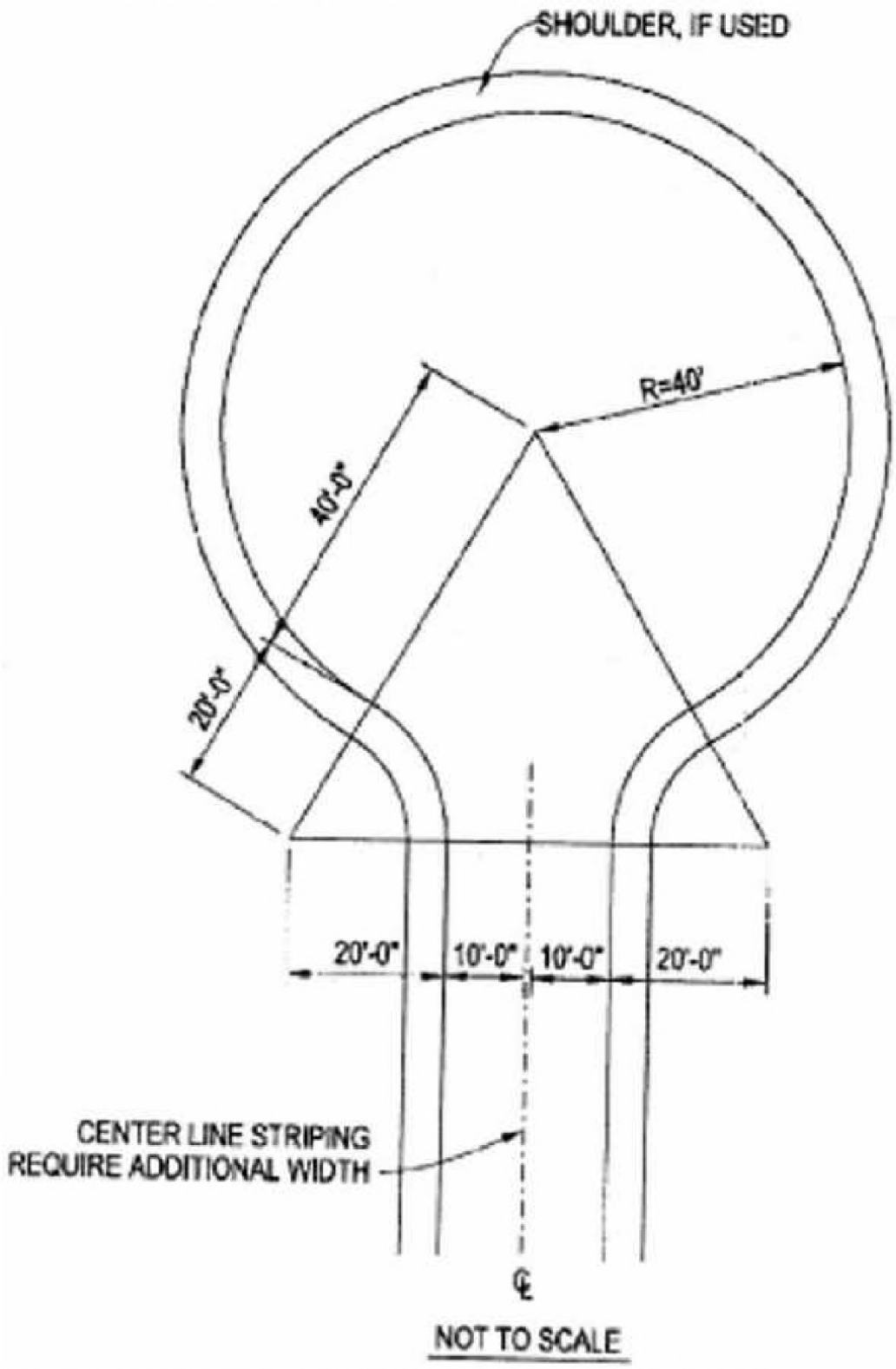
§ 1273.03 - Grades
(a) At no point shall the grade for all Roads and Driveways exceed 16 percent.
(b) The grade may exceed 16%, not to exceed 20%, with approval from the Local Jurisdiction and with mitigations to provide for Same Practical Effect.

§ 1273.04 – Radius

(a) No Road or Road Structure shall have a horizontal inside radius of curvature of less than fifty (50) feet. An additional surface width of four (4) feet shall be added to curves of 50-100 feet radius; two (2) feet to those from 100-200 feet.
(b) The length of vertical curves in *Roadway*s, exclusive of gutters, ditches, and drainage structures designed to hold or divert water, shall be not less than one hundred (100) feet.

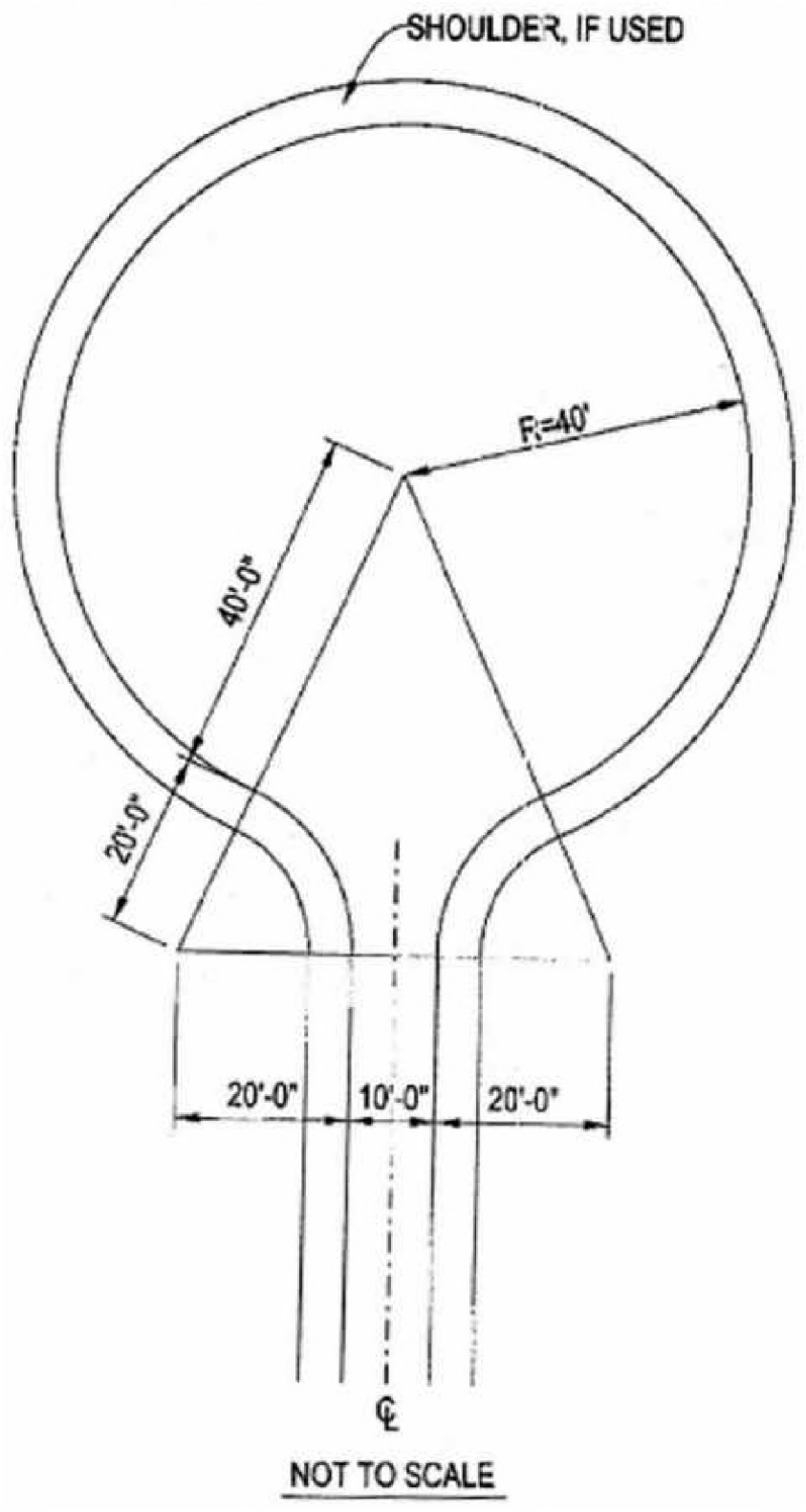
§ 1273.05 – Turnarounds
(a) Turnarounds are required on Driveways and Dead-end Roads.
(b) The minimum turning radius for a turnaround shall be forty (40) feet, not including parking, in accordance with the figures in 14 CCR §§ 1273.05(e) and 1273.05(f). If a hammerhead/T is used instead, the top of the "T" shall be a minimum of sixty (60) feet in length.
(c) Driveways exceeding 150 feet in length, but less than 800 feet in length, shall provide a turnout near the midpoint of the Driveway. Where the driveway exceeds 800 feet, turnouts shall be provided no more than 400 feet apart.
(d) A turnaround shall be provided on Driveways over 300 feet in length and shall be within fifty (50) feet of the building.
(d) Each Dead-end Road shall have a turnaround constructed at its terminus. Where parcels are zoned five (5) acres or larger, turnarounds shall be provided at a maximum of 1,320 foot intervals.

(e) Figure A. Turnarounds on roads with two ten-foot traffic lanes.
Figure A/Image 1 is a visual representation of paragraph (b).



(f) Figure B. Turnarounds on driveways with one ten-foot traffic lane.

Figure B/Image 2 is a visual representation of paragraph (b).



§ 1273.06 – Turnouts
Turnouts shall be a minimum of twelve (12) feet wide and thirty (30) feet long with a minimum twenty-five (25) foot taper on each end.

§ 1273.07 - Road and Driveway Structures
(a) Appropriate signing, including but not limited to weight or vertical clearance limitations, One-way Road or single traffic lane conditions, shall reflect the capability of each bridge.
(b) Where a bridge or an elevated surface is part of a Fire Apparatus access road, the bridge shall be constructed and maintained in accordance with the American Association of State and Highway Transportation Officials Standard Specifications for Highway Bridges, 17th Edition, published 2002 (known as AASHTO HB-17), hereby incorporated by reference. Bridges and elevated surfaces shall be designed for a live load sufficient to carry the imposed loads of fire apparatus. Vehicle load limits shall be posted at both entrances to bridges when required by the local authority having jurisdiction.
(c) Where elevated surfaces designed for emergency vehicle use are adjacent to surfaces which are not designed for such use, barriers, or signs, or both, as approved by the local authority having jurisdiction, shall be installed and maintained.
(d) A bridge with only one traffic lane may be authorized by the Local Jurisdiction; however, it shall provide for unobstructed visibility from one end to the other and turnouts at both ends.

§ 1273.08 - Dead-End Roads
(a) The maximum length of a Dead-end Road, including all Dead-end Roads accessed from that Dead-end Road, shall not exceed the following cumulative lengths, regardless of the number of parcels served:
parcels zoned for less than one acre - 800 feet
parcels zoned for 1 acre to 4.99 acres - 1,320 feet
parcels zoned for 5 acres to 19.99 acres - 2,640 feet
parcels zoned for 20 acres or larger - 5,280 feet
All lengths shall be measured from the edge of the Road surface at the intersection that begins the Road to the end of the Road surface at its farthest point. Where a dead-end road crosses areas of differing zoned parcel sizes requiring different length limits, the shortest allowable length shall apply.
(b) See 14 CCR § 1273.05 for dead-end road turnaround requirements.

§ 1273.09 - Gate Entrances
(a) Gate entrances shall be at least two (2) feet wider than the width of the traffic lane(s) serving that gate and a minimum width of fourteen (14) feet unobstructed horizontal clearance and unobstructed vertical clearance of thirteen feet, six inches (13' 6").

(b) All gates providing access from a Road to a Driveway shall be located at least thirty (30) feet from the roadway and shall open to allow a vehicle to stop without obstructing traffic on that Road.
(c) Where a One-way Road with a single traffic lane provides access to a gated entrance, a forty (40) foot turning radius shall be used.
(d) Security gates shall not be installed without approval. Where security gates are installed, they shall have an approved means of emergency operation. Approval shall be by the local authority having jurisdiction. The security gates and the emergency operation shall be maintained operational at all times.

ATTACHMENT 3

Brandon Araujo's Resume

BRANDON J. ARAUJO, P.E.
(626) 252-1523
brjaraujo@gmail.com

EDUCATION:
Stanford University, Master of Science, Structural Engineering & Geomechanics, June 2008
Stanford University, Bachelor of Science, Civil & Environmental Engineering, June 2007

EXPERIENCE:
City of Hermosa Beach, *Senior Engineer*, Hermosa Beach, CA (05/2024 – PRESENT)
- Project Manager for the complex, multi-agency Greenwich Village Underground Utility Assessment District.
- Prepared, reviewed, interpreted, analyzed, and modified engineering plans, drawings, specifications, contract documents, and engineering reports for conformance to professional standards and approved budgets.
- Possessed excellent organizational skills and ability to manage multiple projects with competing deadlines.
- Administered the Bid & Award phase of projects: issued Notice Inviting Bids, responded to questions, evaluated bids, and recommended project award. Administered contracts after award. Ensured Contractor compliance with the City's contract documents.
- Applied for outside funding for City projects; administered funding and followed reporting requirements as required. Prepared requests for reimbursement and administered grant funds.
- Coordinated assigned activities with other divisions, departments, and outside agencies; attended and participated in professional group meetings.
- Prepared staff reports, and presentation materials, for City Council
- Assisted with, planning, budgeting, and administration of the city-wide Capital Improvement Program, Public Works operating budget, and associated projects.
- Responded to, and resolved, difficult inquiries and complaints from the property owners, contractors, and others regarding Public Works projects and activities.
- Responded to questions and inquiries from a variety of sources regarding department functions.
- Communicated clearly and concisely, both orally and in writing; and established and maintained effective working relationships with those contacted in the course of work.

City of Los Angeles, **Bureau of Engineering**, *Civil Engineer*, Los Angeles, CA (02/2022 – 05/2024)
- Project Manager of a variety of complex Capital Improvement Projects, planned, directed, and coordinated, through subordinates, a variety of complex professional civil engineering assignments related to the delivery of a project portfolio with a construction value of over $100,000,000.
- Served as the project manager on complex Capital Improvement Projects.
- Managed the preparation and performed technical reviews of engineering plans, specifications, construction estimates, and construction bid documents for public works projects.
- Prepared, reviewed, interpreted, analyzed, and modified engineering plans, drawings, specifications, contract documents, and engineering reports for conformance to professional standards and approved budgets.
- Supervised the preparation of special engineering studies and prepared technical reports.
- Possessed excellent organizational skills and the demonstrated the ability to manage multiple projects with competing deadlines.
- Lead, mentored, reviewed, and monitored the work of staff responsible for performing professional engineering work.

- Directed and supervised the technical and administrative work of consultants. Ensured consultant compliance with City standards, specifications, and budget.
- Recommended procedural improvements and modifications.
- Prepared the Bureau's manual on the administration of special assessment and improvement districts.
- Responded to, and resolved, difficult inquiries and complaints from contractors regarding Public Works projects and activities.
- Communicate clearly and concisely, both orally and in writing; and establish and maintain effective working relationships with those contacted in the course of work.

City of Los Angeles, Department of Transportation, Los Angeles, CA (11/2019 – 02/2022)
Transportation Engineer (11/2021-02/2022)
- Transportation Engineer for Vision Zero's Safety Engineering group.
- Worked on implementing lower speed limits throughout the City in response to AB43
- Worked on various policies, programs, and projects to reduce the number of people killed or severely injured in automobile collisions in the City.

Transportation Engineering Associate II (11/2019-11/2021)
- Member of the Metro Programs Division—a one-stop, on-demand service dedicated solely to the Department's review of all of Metro's capital improvement programs within City limits.
- Reviewed, checked, verified, and critiqued the technical validity of Metro's plans to remove and replace all of their transportation system's red light enforcement cameras.
- Communicated effectively, both orally and in writing, with Metro to report the City's findings, explain our positions, and respond to their questions, comments, or concerns.

City of Vernon, *Project Engineer*, Vernon, CA (12/2016 – 11/2019)
- Performed complex professional engineering duties involved in the design and development of the federally-funded Atlantic Boulevard Bridge Widening over the Los Angeles River.
- Prepared, reviewed, interpreted, analyzed, and modified engineering plans, drawings, specifications, contract documents, and engineering reports for conformance to professional standards and approved budgets.
- Possessed excellent organizational skills and ability to manage multiple projects with competing deadlines.
- Issued grading and storm drain permits for private developments as required and ensures\d compliance and conformance with scope of work standards and specifications. Performed inspection of work in the field by contractors and developers for the City's grading and storm drain permits.
- Performed the development, advertising, and selection process for professional services. Evaluated proposals and recommended project award. Negotiated and administered contracts after award. Ensured consultant compliance with City standards, specifications, and budget.
- Applied for outside funding for City projects; administered funding and followed reporting requirements as needed. Prepared and administered grant funds.
- Coordinated assigned activities with other divisions, departments, and outside agencies; attended and participated in professional group meetings.
- Prepared staff reports, and presentation materials, for City Council, Vernon Business and Industry Commission, and other public meetings and represented the City as required.
- Assisted with, planning, budgeting, and administration of the city-wide Capital Improvement Program, Public Works operating budget, and associated projects.

- Responded to, and resolved, difficult inquiries and complaints from the property owners, contractors, and others regarding Public Works projects and activities.
- Responded to questions and inquiries from a variety of sources regarding department functions.
- Communicated clearly and concisely, both orally and in writing; and established and maintained effective working relationships with those contacted in the course of work.

Orange County Public Works, Santa Ana, CA (9/2011 – 12/2016)
Civil Engineer (9/2015-12/2016)
- Planned, laid out, directed, reviewed, and controlled the work of a group of engineering staff.
- Supervised, trained, and evaluated subordinate personnel.
- Supervised the preparation of the temporary traffic control and detour plans for the slurry sealing of all of the collectors and arterial highways within Ladera Ranch.
- Responsible for the Traffic Engineering department's review and approval of the 4.75-mile-long extension of the 241 Toll Road.
- Responsible for the department's review and approval of street improvement plans prepared for arterial and collector streets in new planned communities.
- Initiated the hiring process for Temporary Extra-Help employees: advertised the position, evaluated resumes, interviewed potential candidates, and selected candidates.

Acting Senior Civil Engineer (5/2015-8/2015)
- Managed the Traffic Studies section of the Traffic Engineering Department.
- Planned, laid out, directed, reviewed, and controlled the work of a group of engineering staff to achieve organizational and project objectives in a timely manner.
- Coordinated the work of the Traffic Studies unit to review traffic studies, county property permits, street improvement plans, and signing and striping plans submitted to the Department for review and approval.
- Responsible for the Division's review of tentative tract maps prepared for new planned communities in south Orange County.

Civil Engineer (10/2012-5/2015)
- Prepared plans, specifications, and estimates for traffic-related items for the County's roadway CIP.
- Prepared temporary traffic control plans for construction and permanent signing and striping plans.
- Conducted field inspections of temporary traffic control, signing, and striping.
- Responded to and resolved difficult complaints related to construction projects.
- Made presentations to the general public regarding construction projects.

REGISTRATION:
- Professional Civil Engineer, State of California (License #75996)
- Water & Wastewater Treatment Certificate, Loyola Marymount University
- Building Plans Examiner, International Code Council (Certificate #9703625)

TRAINING:
Geometric Design for California, Institute of Transportation Studies, UC Berkeley
Resident Engineers Academy, Local Technical Assistance Program, Caltrans

SKILLS: MicroStation, AutoCAD, Microsoft Project, SmartSheet, Microsoft Excel, Microsoft Word

South Valley Area Planning Commission
4230 N. Saltillo Street
December 1, 2025

EXHIBIT B

PROTECTED TREE REPORT &
CHAPTER 49 LANDSCAPE COMPLIANCE REVIEW
4230 Saltillo

PREPARED FOR :

JAMIE T. HALL
CHANNEL LAW GROUP, LLP

BY: DIANA NICOLE ZOGRAN, MS
November 28, 2025

OVERVIEW :

The Project site is within a Very High Fire Hazard Severity Zone (VHFHSZ), which establishes defensible space, vegetation clearance and landscaping requirements. As such, it is subject to vegetation management regulations under L.A.M.C. 57.4906.5.2 and Chapter 49 of the California Fire Code, which was adopted in 2023 by the Los Angeles Department of Building and Safety (LADBS) for new construction within Wildland-Urban Interface areas. Chapter 49 includes the development of minimum requirements for defensible space and landscape plans and long-term vegetation management to reduce the hazards of fire in the VHFHSZ.

SCOPE OF WORK:

The applicant has requested the removal of two protected Coast live oak trees (Quercus agrifolia) with a mitigation planting scheme of four 15 gallon or 24 inch box sized Quercus agrifolia trees I have reviewed the tree removal and landscape plans, and conclude that City cannot lawfully rely on the submitted materials to support compliance with the City's Protected Tree Ordinance, Chapter 49 or CEQA findings of "no impact" or "less than significant impact."

These regulations require strict adherence to spacing, height, clearance from structures, and fuel load reductions, all designed to minimize fire risk. These requirements apply to both new construction and associated landscaping, including mitigation plantings.

OBSERVATIONS AND COMMENTS:

This memorandum identifies deficiencies in the 4230 Saltillo Street project record relevant to CEQA compliance, including the absence of measurable, scaled plan sheets, reliance on an outdated tree report or biological baseline, and failure to demonstrate conformance with the City's Protected Tree Ordinance and Chapter 49 (Wildland-Urban Interface Fire Areas) of the California Fire Code.

I. THE RECORD RELIES ON UNSCALED, "REDUCED" TREE SURVEY MAPS THAT ARE NOT MEASURABLE

A. Appendix A.1 and A.2 are explicitly labeled "reduced"

The project's Protected Tree Report includes **Appendix A.1** ("Tree Location – Survey Map, Reduced") and **Appendix A.2** ("Tree Replacement Map, Site Plan Reduced"). These sheets:

- contain no graphic scale bar,
- contain no printed numeric scale,
- contain no dimension strings, and
- have been reduced from their original sheet size.

Because the reduction ratio is unknown, these diagrams cannot be measured or scaled.

B. Reduced diagrams cannot constitute substantial evidence

CEQA Guidelines §15384 requires information that can be independently verified.

Because plan sheets are reduced and lack any physical or digital measurement reference:

- Tree-to-structure distances cannot be calculated.
- Dripline radii cannot be confirmed.
- Root-zone encroachment cannot be evaluated.
- Spacing between mitigation oaks cannot be checked.
- No defensible-space clearance distances can be confirmed.

C. Cannot rely on reduced, unscaled diagrams to determine "no impact"

The absence of measurable plans forecloses any meaningful review of impacts to:

- Protected trees
- Biological resources
- Grading within driplines
- Wildfire hazard and defensible space
- Landscaping conflicts with Chapter 49

II. THE PROTECTED TREE REPORT IS OUTDATED (2022) AND CANNOT SERVE AS THE CEQA BASELINE

A. CEQA baseline must reflect existing environmental conditions (Guidelines §15125(a))

The Protected Tree Report is dated **September 2022**. The environmental baseline for CEQA purposes must reflect existing conditions at the time of environmental review.

B. Coast live oak canopies expand annually; a 2022 report understates current canopy and root protection zones

Typical canopy expansion in Quercus agrifolia is **6–18 inches per year**. Because the project is now under review in 2025:

- Dripline radii are significantly larger than shown in the 2022 report.
- Tree Protection Zones (TPZs) are mislocated.
- Construction encroachment risks are higher than depicted.
- Root zones may extend further into grading and retaining wall areas.

An outdated tree report cannot be treated as substantial evidence, and any finding relying on it is legally deficient.

III. THE LANDSCAPE PLAN DOES NOT DEMONSTRATE COMPLIANCE WITH CHAPTER 49 (WUI FIRE AREAS)

Chapter 49 mandates documentation showing:

- 0–5 ft noncombustible Zone 0
- 5–30 ft reduced-fuel Zone 1
- Crown separation between tree canopies
- 10 ft minimum clearance between tree crowns and structures, at maturity
- Vertical separation between shrubs and tree canopies (ladder-fuel avoidance)
- Mature canopy representation for all proposed trees

A. The project's planting plan contains none of the required elements

The "Updated Plans 4230 Saltillo 62.pdf" sheet provides:

- no spacing distances,
- no vegetation-to-structure measurements,
- no mature tree canopy diagrams,
- no depiction of Zones 0, 1, or 2,
- no tree-to-tree crown separation,
- shrubs planted directly under oak canopies,
- vegetation shown adjacent to structures, flammable decks, and retaining walls.

B. Without dimensioned spacing, Chapter 49 compliance cannot be verified

Any conclusion that the project complies with Chapter 49 would be:

- unsupported,
- conclusory,
- contrary to the record, and
- invalid under CEQA's substantial evidence standard.

IV. CONCLUSION

A finding of "no impact" or "less than significant impact" cannot be relied on or supported by on the submitted materials.

The record lacks:

- measurable plan sheets,
- a valid environmental baseline,
- defensible-space documentation, and
- verifiable biological constraints.

For these reasons:

- Further environmental review is required,
- A revised and updated Protected Tree Report must be prepared,
- Full-size, scaled drawings must be provided

Sincerely,

s/Diana Nicole

November 28, 2025

About the Expert. Diana Nicole Zogran is an accredited ecological horticulture professional and tree expert. She is known for advancing a scientific approach to landscape design and land care. The Walt Disney Company has been among her Fortune 100 and Fortune 500 clients. She has provided professional services for the largest residential real estate development and management corporations in the nation, non-profits, and private property owners for over 30 years. Diana graduated with a Master's in Horticulture Science from the University of Florida.

Channel Law Group, LLP

March 9, 2026

Justification for CEQA Appeal;
4230 N. Saltillo Street; Case Nos.: ZA-2023-1206-ZAD-DRB-SPP-MSP-HCA; ENV-2023-1207-CE ("Project")

EXHIBIT C

South Valley APC Hearing PowerPoint Presentation

4230 N. SALTILLO STREET

CASE NO.: ZA-2023-1206-ZAD-DRB-SPP-MSP-HCA; ENV-2023-1207-CE

APPEAL TO THE SOUTH VALLEY AREA PLANNING COMMISSION

DECEMBER 11, 2025



WHO IS GIRARD TRACT COMMUNITY PRESERVATION?

Girard Tract Community Preservation was founded to advocate for the preservation of the natural environment and to protect public safety.

THE PROJECT

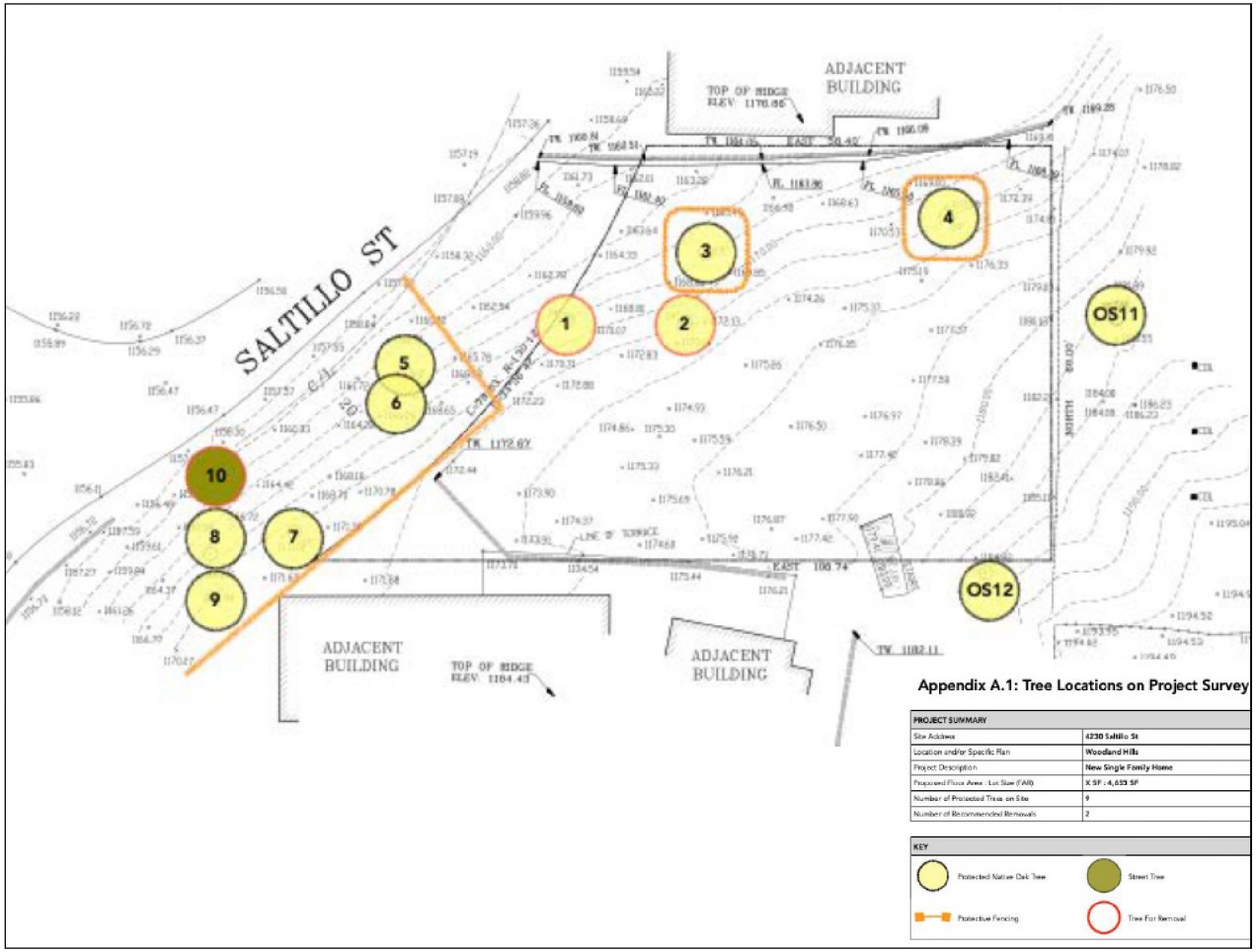
- 4230 N. Saltillo Street
- Site is downslope and visible from the Mulholland Drive right-of-way, located in the Inner Corridor, and subject to the Baseline Hillside Ordinance. The lot is zoned R1-1 and fronts on a Substandard Hillside Limited Street
- Proposed construction of a new two-story 1,899 square foot single family home with a 573 square foot 4-car garage, 818 square foot basement, two retaining walls, and a swimming pool
- ZAD exemption from CEQA and multiple requested entitlements granted 12/19/24
- Project does not comply with the State Minimum Fire Safe Regulations and LAMC § 57.4908.1



THE PROJECT SITE CONTAINS AN OAK WOODLAND

- There are 9 oak trees on the project site and the project will remove 2 of those trees
- Oak woodlands are "considered sensitive resources" under CEQA
- The Project will forever remove habitat





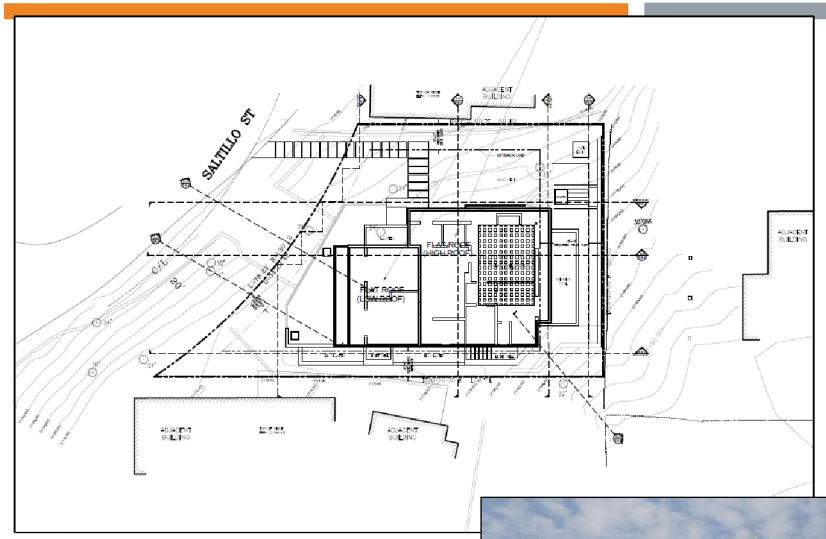
Appendix A.1: Tree Locations on Project Survey

PROJECT SUMMARY	
Site Address	4230 Saltillo St
Location and/or Specific Plan	Woodland Hills
Project Description	New Single Family Home
Proposed Floor Area · Lot Size (FAR)	X SF : 4,633 SF
Number of Protected Trees on Site	9
Number of Recommended Removals	2

KEY

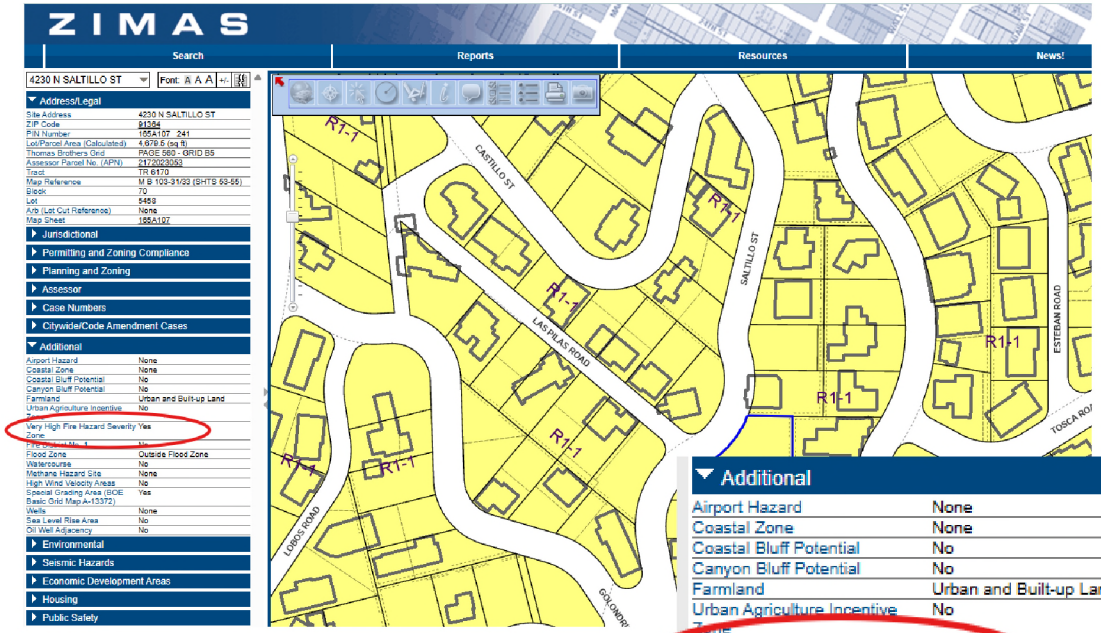
Protected Native Oak Tree · Street Tree · Protective Fencing · Tree For Removal

THE PLAN


SALTILLO ST
ADJACENT BUILDING
FLAT ROOF (UNLADDER)
FLAT ROOF (UNLADDER)
ADJACENT BUILDING
ADJACENT BUILDING
ADJACENT BUILDING



- The Project in question is located in a Very High Fire Hazard Severity Zone as documented in ZIMAS



Additional

Airport Hazard	None
Coastal Zone	None
Coastal Bluff Potential	No
Canyon Bluff Potential	No
Farmland	Urban and Built-up Land
Urban Agriculture Incentive Zone	No
Very High Fire Hazard Severity Zone	Yes
Fire District No. 1	No
Flood Zone	Outside Flood Zone
Watercourse	No
Methane Hazard Site	None
High Wind Velocity Areas	No
Special Grading Area (BOE Basic Grid Map A-13372)	Yes
Wells	None
Sea Level Rise Area	No
Oil Well Adjacency	No

Environmental

Seismic Hazards

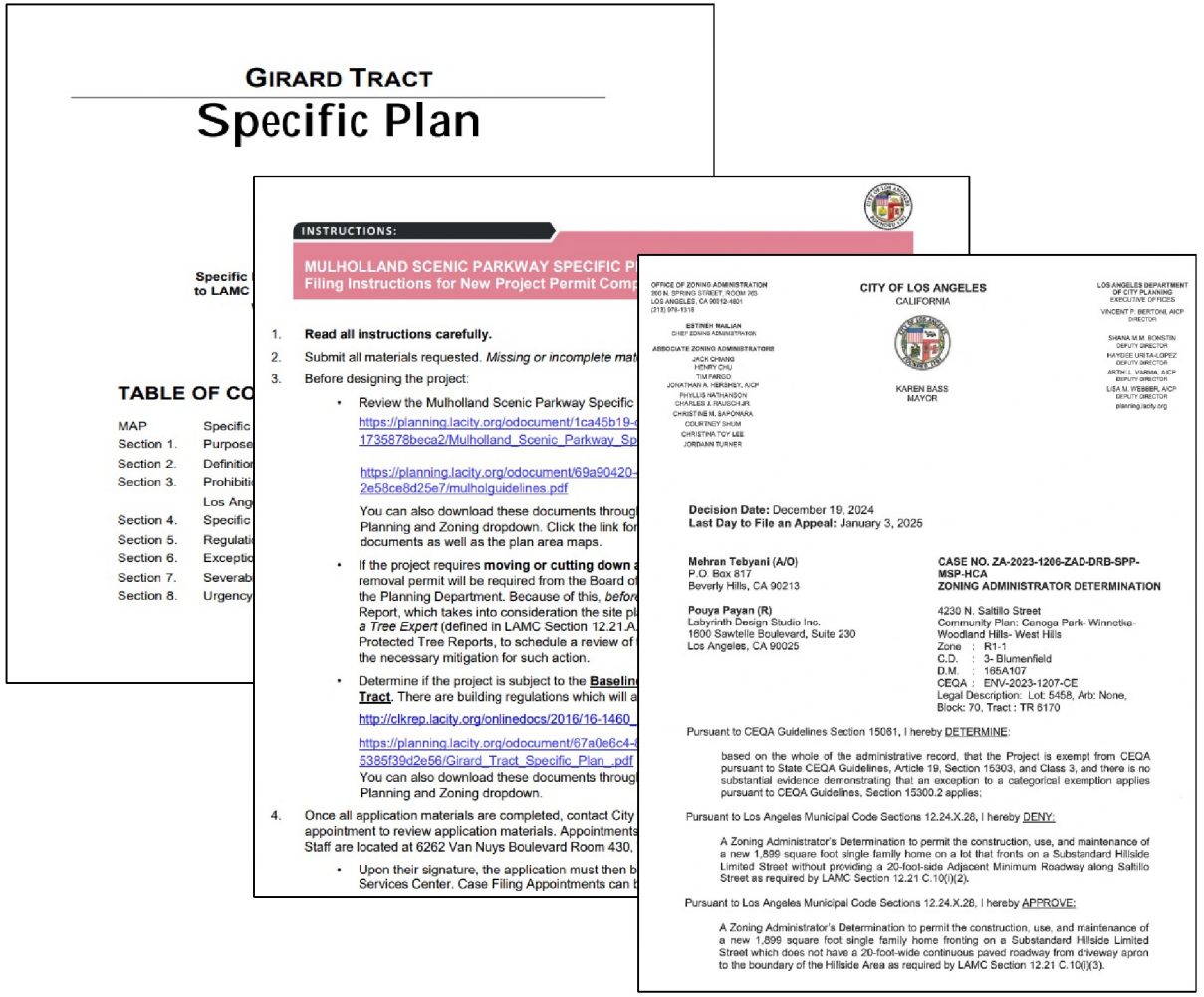
VERY HIGH FIRE HAZARD SEVERITY ZONE ("VHFHSZ")

WHEN?
WHERE?
WHY?

- First established in the City of Los Angeles in 1999 and replaced the older "Mountain Fire District" and "Buffer Zone."
- In 2018, Senate Bill 901 mandated the expansion of the scope of California's regulations to include those classified and designated as VHFHSZ to include Local Responsibility Areas.
- The California Board of Forestry and Fire Protection adopted the Minimum Fire Safe Regulations ("Regulations") in 2021.
- Comprises most of the hilly and mountainous regions of the City of Los Angeles.
- To establish *minimum* fire safety standards for residential, commercial, and industrial development, provide basic emergency access and perimeter wildfire protection, protect undeveloped ridgelines, and reduce fire risk.

REQUESTED DISCRETIONARY ENTITLEMENTS

- ZAD to permit construction, use, and maintenance of a new 1,899 sf single family home fronting on a Substandard Hillside Limited Street with less than 20' wide road (LAMC 12.24.X.28, 12.21 C.10(i)(3)
- Girard Tract Project Permit Compliance Review (LAMC 11.5 7 C and Section 5 of the Girard Tract (Ordinance No. 165,040))
- Project Permit Compliance and Design Review approval (LAMC 11.5. 7 C and 16.50, and Section 11 of the Mulholland Scenic Parkway Specific Plan (Ordinance No. 167,943))



GIRARD TRACT

Specific Plan

INSTRUCTIONS:

MULHOLLAND SCENIC PARKWAY SPECIFIC P
Filing Instructions for New Project Permit Com

1. **Read all instructions carefully.**
2. Submit all materials requested. *Missing or incomplete mat*
3. Before designing the project:
   - Review the Mulholland Scenic Parkway Specific
     https://planning.lacity.org/odocument/1ca45b19-
     1735878beca2/Mulholland_Scenic_Parkway_Sp
     https://planning.lacity.org/odocument/69a90420-
     2e58ce8d25e7/mulholguidelines.pdf
     You can also download these documents throug
     Planning and Zoning dropdown. Click the link for
     documents as well as the plan area maps.
   - If the project requires **moving or cutting down a**
     removal permit will be required from the Board o
     the Planning Department. Because of this, *before*
     Report, which takes into consideration the site pl
     a Tree Expert (defined in LAMC Section 12.21.A.
     Protected Tree Reports, to schedule a review of
     the necessary mitigation for such action.
   - Determine if the project is subject to the **Baselin**
     Tract. There are building regulations which will a
     http://clkrep.lacity.org/onlinedocs/2016/16-1460_
     https://planning.lacity.org/odocument/67a0e6c4-
     5385f39d2e56/Girard_Tract_Specific_Plan_.pdf
     You can also download these documents throug
     Planning and Zoning dropdown.
4. Once all application materials are completed, contact City
   appointment to review application materials. Appointments
   Staff are located at 6262 Van Nuys Boulevard Room 430.
   - Upon their signature, the application must then b
     Services Center. Case Filing Appointments can b

TABLE OF CO

MAP	Specific
Section 1.	Purpose
Section 2.	Definitio
Section 3.	Prohibiti
	Los Ang
Section 4.	Specific
Section 5.	Regulati
Section 6.	Exceptio
Section 7.	Severab
Section 8.	Urgency

OFFICE OF ZONING ADMINISTRATION
200 N. SPRING STREET, ROOM 763
LOS ANGELES, CA 90012-4801
(213) 978-1318

ESTINEH MAILIAN
CHIEF ZONING ADMINISTRATOR

ASSOCIATE ZONING ADMINISTRATORS
JACK CHIANG
HENRY CHU
TIM FARGO
JONATHAN A. HERSHEY, AICP
PHYLLIS NATHANSON
CHARLES J. RAUSCH JR.
CHRISTINE M. SAPONARA
COURTNEY SHUM
CHRISTINA TOY LEE
JORDANN TURNER

CITY OF LOS ANGELES
CALIFORNIA

KAREN BASS
MAYOR

LOS ANGELES DEPARTMENT OF CITY PLANNING
EXECUTIVE OFFICES
VINCENT P. BERTONI, AICP
DIRECTOR

SHANA M.M. BONSTIN
DEPUTY DIRECTOR
HAYDEE URITA-LOPEZ
DEPUTY DIRECTOR
ARTHI L. VARMA, AICP
DEPUTY DIRECTOR
LISA M. WEBBER, AICP
DEPUTY DIRECTOR
planning.lacity.org

Decision Date: December 19, 2024
Last Day to File an Appeal: January 3, 2025

Mehran Tebyani (A/O)
P.O. Box 817
Beverly Hills, CA 90213

Pouya Payan (R)
Labyrinth Design Studio Inc.
1600 Sawtelle Boulevard, Suite 230
Los Angeles, CA 90025

CASE NO. ZA-2023-1206-ZAD-DRB-SPP-MSP-HCA
ZONING ADMINISTRATOR DETERMINATION

4230 N. Saltillo Street
Community Plan: Canoga Park- Winnetka-Woodland Hills- West Hills
Zone : R1-1
C.D. : 3- Blumenfield
D.M. : 166A107
CEQA : ENV-2023-1207-CE
Legal Description: Lot: 5458, Arb: None, Block: 70, Tract : TR 6170

Pursuant to CEQA Guidelines Section 15061, I hereby DETERMINE:

based on the whole of the administrative record, that the Project is exempt from CEQA pursuant to State CEQA Guidelines, Article 19, Section 15303, and Class 3, and there is no substantial evidence demonstrating that an exception to a categorical exemption applies pursuant to CEQA Guidelines, Section 15300.2 applies;

Pursuant to Los Angeles Municipal Code Sections 12.24.X.28, I hereby DENY:

A Zoning Administrator's Determination to permit the construction, use, and maintenance of a new 1,899 square foot single family home on a lot that fronts on a Substandard Hillside Limited Street without providing a 20-foot-side Adjacent Minimum Roadway along Saltillo Street as required by LAMC Section 12.21 C.10(i)(2).

Pursuant to Los Angeles Municipal Code Sections 12.24.X.28, I hereby APPROVE:

A Zoning Administrator's Determination to permit the construction, use, and maintenance of a new 1,899 square foot single family home fronting on a Substandard Hillside Limited Street which does not have a 20-foot-wide continuous paved roadway from driveway apron to the boundary of the Hillside Area as required by LAMC Section 12.21 C.10(i)(3).



APPEAL POINTS

NON-COMPLIANCE WITH STATE MINIMUM FIRE SAFE REGULATIONS

CODIFIED AT CAL. CODE REGS. TIT. 14 § 30.00 ET SEQ.

State Minimum Fire Safe Regulations are a California standard for construction in wildfire-prone areas, mandating minimum requirements for road access, signs, private water supplies, and vegetation management.

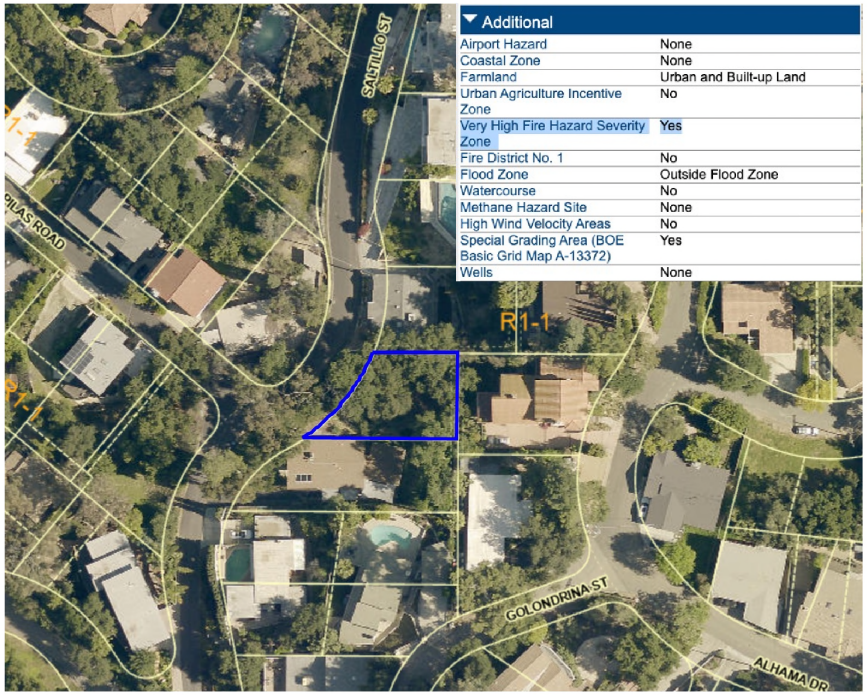
In 2018, Senate Bill 901 mandated the expansion of the scope of California's regulations regarding minimum fire safety standards to include those lands classified and designated as Very High Fire Hazard Severity Zones ("VHFHSZ"), as defined in subdivision (i) of Government Code § 51177, to include Local Responsibility Areas.

These regulations, initially adopted to protect buildings and provide for emergency fire access and evacuation, were expanded in 2021 to include Local Responsibility Areas in Very High Fire Hazard Severity Zones (VHFHSZ).



THE PROJECT DOES NOT MEET THE STANDARDS

- The Project is located within a Very High Fire Hazard Severity Zone in a Local Responsibility Area.
- Saltillo Street does not comply with the requirement that roads contain two 10-foot minimum traffic lanes as set forth at Cal. Code Regs. tit. 14 § 1273.01.
- Saltillo Street does not comply with the requirement that roads be less than 20 percent grade. Cal. Code Regs. tit. 14 § 1273.03.



Additional	
Airport Hazard	None
Coastal Zone	None
Farmland	Urban and Built-up Land
Urban Agriculture Incentive Zone	No
Very High Fire Hazard Severity Zone	Yes
Fire District No. 1	No
Flood Zone	Outside Flood Zone
Watercourse	No
Methane Hazard Site	None
High Wind Velocity Areas	No
Special Grading Area (BOE Basic Grid Map A-13372)	Yes
Wells	None





THE PROJECT IS SUBJECT TO THE REGULATIONS

BUILDING PERMIT & USE PERMIT



(c) Affected activities include, but are not limited to:

(1) permitting or approval of new parcels, excluding lot line adjustments as specified in Government Code (GC) section 66412(d);

(2) application for a Building permit for new construction not relating to an existing Structure;

(3) application for a use permit;

(4) Road construction including construction of a Road that does not currently exist, or extension of an existing Road.

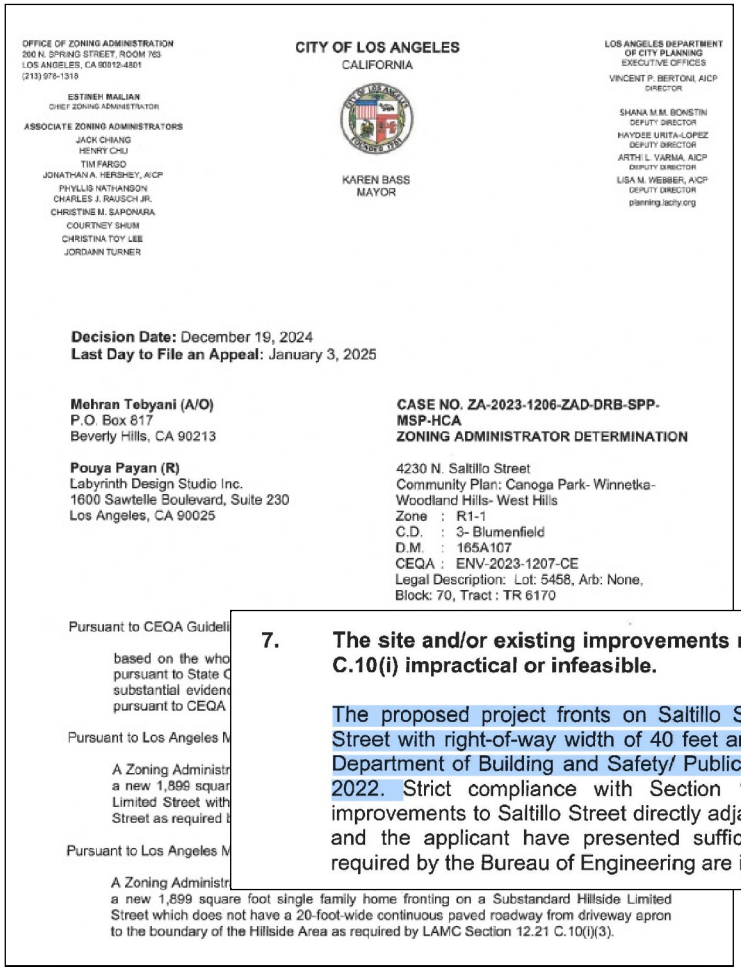
Cal. Code Regs. Tit. 14, § 1270.03 - Scope

MINIMUM STANDARDS SET FORTH IN REGULATIONS

- **20-foot-wide Roadways**: Section 12.73.01(a) of the Regulations require that: All roads shall be constructed to provide a minimum of **two ten (10) foot traffic lanes**, not including shoulder and striping. These traffic lanes shall provide for two-way traffic flow to support emergency vehicle and civilian egress, unless other standards are provided in this article or additional requirements are mandated by Local Jurisdictions or local subdivision requirements. Vertical clearances shall conform to the requirements in California Vehicle Code section 35250.

- **Grades:** Section 1273.03 (a) At no point shall the grade for all Roads and Driveways exceed 16 percent. (b) The grade may exceed 16%, not to exceed 20%, with approval from the Local Jurisdiction and with mitigations to provide for Same Practical Effect.

THE LETTER OF DETERMINATION ISSUED BY THE ZA ADMITS THAT SALTILLO STREET IS LESS THAN 20 FEET



OFFICE OF ZONING ADMINISTRATION
200 N. SPRING STREET, ROOM 763
LOS ANGELES, CA 90012-4801
(213) 978-1318

ESTINEH MAILIAN
CHIEF ZONING ADMINISTRATOR

ASSOCIATE ZONING ADMINISTRATORS
JACK CHIANG
HENRY CHU
TIM FARGO
JONATHAN A. HERSHEY, AICP
PHYLLIS NATHANSON
CHARLES J. RAUSCH JR.
CHRISTINE M. SAPONARA
COURTNEY SHUM
CHRISTINA TOY LEE
JORDANN TURNER

CITY OF LOS ANGELES
CALIFORNIA

KAREN BASS
MAYOR

LOS ANGELES DEPARTMENT OF CITY PLANNING
EXECUTIVE OFFICES
VINCENT P. BERTONI, AICP
DIRECTOR
SHANA M.M. BONSTIN
DEPUTY DIRECTOR
HAYDEE URITA-LOPEZ
DEPUTY DIRECTOR
ARTHI L. VARMA, AICP
DEPUTY DIRECTOR
LISA M. WEBBER, AICP
DEPUTY DIRECTOR
planning.lacity.org

Decision Date: December 19, 2024
Last Day to File an Appeal: January 3, 2025

Mehran Tebyani (A/O)
P.O. Box 617
Beverly Hills, CA 90213

Pouya Payan (R)
Labyrinth Design Studio Inc.
1600 Sawtelle Boulevard, Suite 230
Los Angeles, CA 90025

CASE NO. ZA-2023-1206-ZAD-DRB-SPP-MSP-HCA
ZONING ADMINISTRATOR DETERMINATION

4230 N. Saltillo Street
Community Plan: Canoga Park- Winnetka-Woodland Hills- West Hills
Zone : R1-1
C.D. : 3- Blumenfield
D.M. : 165A107
CEQA : ENV-2023-1207-CE
Legal Description: Lot: 5458, Arb: None, Block: 70, Tract : TR 6170

Pursuant to CEQA Guideli

based on the who
pursuant to State C
substantial evidenc
pursuant to CEQA

Pursuant to Los Angeles M

A Zoning Administr
a new 1,899 squar
Limited Street with
Street as required

Pursuant to Los Angeles M

A Zoning Administr
a new 1,899 square foot single family home fronting on a Substandard Hillside Limited Street which does not have a 20-foot-wide continuous paved roadway from driveway apron to the boundary of the Hillside Area as required by LAMC Section 12.21 C.10(i)(3).

7. The site and/or existing improvements make strict adherence to LAMC Section 12.21 C.10(i) impractical or infeasible.

The proposed project fronts on Saltillo Street, which is a Substandard Hillside Limited Street with right-of-way width of 40 feet and a roadway width of less than 20 feet per the Department of Building and Safety/ Public Works Hillside Referral Form dated August 12, 2022. Strict compliance with Section 12.21 C.10(i)(3) of the Code would require improvements to Saltillo Street directly adjacent to the subject property. The local residents and the applicant have presented sufficient justification that the street improvements required by the Bureau of Engineering are impractical and infeasible.

ONE ACCESS ROUTE IS NON-COMPLIANT WITH THE GRADE REQUIREMENTS REQUIRED BY THE REGULATIONS

The requirements for grade are found in Section 1273.03 of the Regulations. Section 1273.03 states:



Cal. Code Regs. Tit. 14, § 1273.03 - Grades

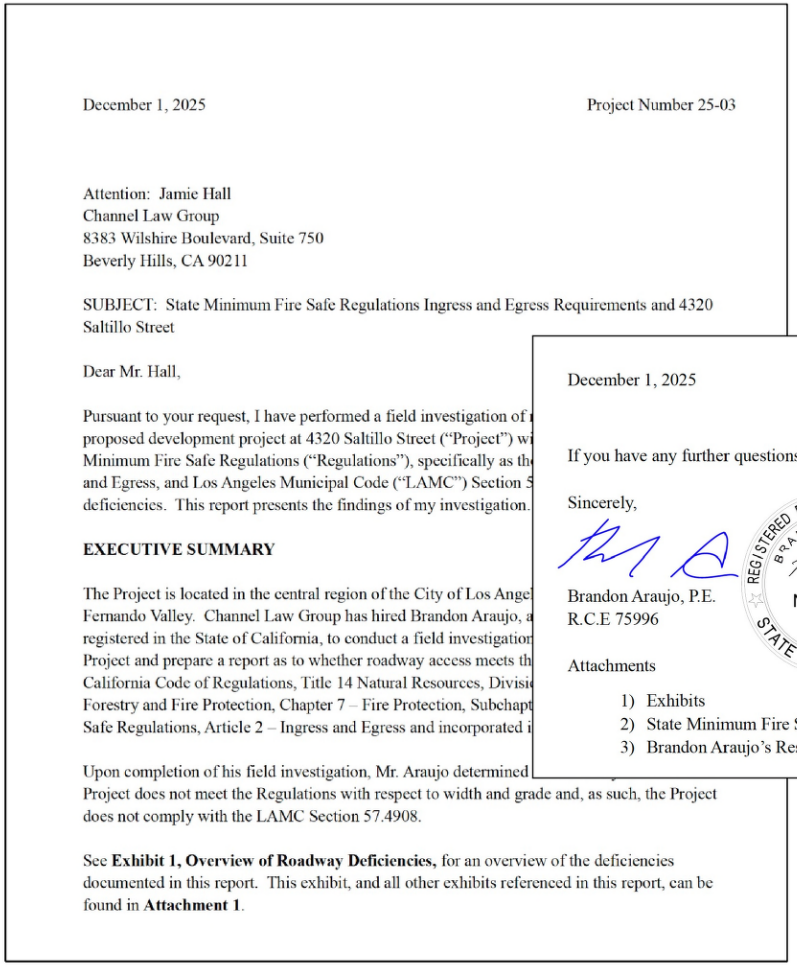
State Regulations | Compare

(a) At no point shall the grade for all Roads and Driveways exceed 16 percent.

(b) The grade may exceed 16%, not to exceed 20%, with approval from the Local Jurisdiction and with mitigations to provide for Same Practical Effect.

APPELLANT COMMISSIONED EXPERT REPORT DEMONSTRATING NON-COMPLIANCE WITH WIDTH AND GRADE

BRANDON ARAUJO, P.E.



December 1, 2025 Project Number 25-03

Attention: Jamie Hall
Channel Law Group
8383 Wilshire Boulevard, Suite 750
Beverly Hills, CA 90211

SUBJECT: State Minimum Fire Safe Regulations Ingress and Egress Requirements and 4320 Saltillo Street

Dear Mr. Hall,

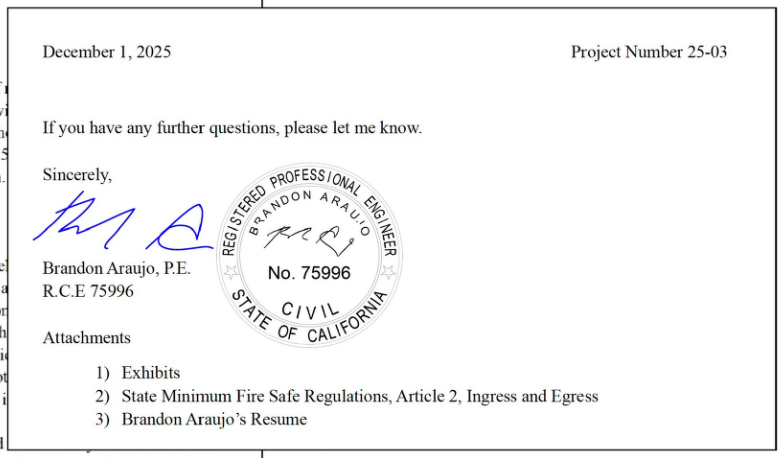
Pursuant to your request, I have performed a field investigation of
proposed development project at 4320 Saltillo Street ("Project") wi
Minimum Fire Safe Regulations ("Regulations"), specifically as th
and Egress, and Los Angeles Municipal Code ("LAMC") Section 5
deficiencies. This report presents the findings of my investigation.

EXECUTIVE SUMMARY

The Project is located in the central region of the City of Los Angel
Fernando Valley. Channel Law Group has hired Brandon Araujo, a
registered in the State of California, to conduct a field investigation
Project and prepare a report as to whether roadway access meets th
California Code of Regulations, Title 14 Natural Resources, Divisi
Forestry and Fire Protection, Chapter 7 – Fire Protection, Subchapt
Safe Regulations, Article 2 – Ingress and Egress and incorporated i

Upon completion of his field investigation, Mr. Araujo determined
Project does not meet the Regulations with respect to width and grade and, as such, the Project does not comply with the LAMC Section 57.4908.

See **Exhibit 1, Overview of Roadway Deficiencies,** for an overview of the deficiencies documented in this report. This exhibit, and all other exhibits referenced in this report, can be found in **Attachment 1**.



December 1, 2025 Project Number 25-03

If you have any further questions, please let me know.

Sincerely,

Brandon Araujo, P.E.
R.C.E 75996

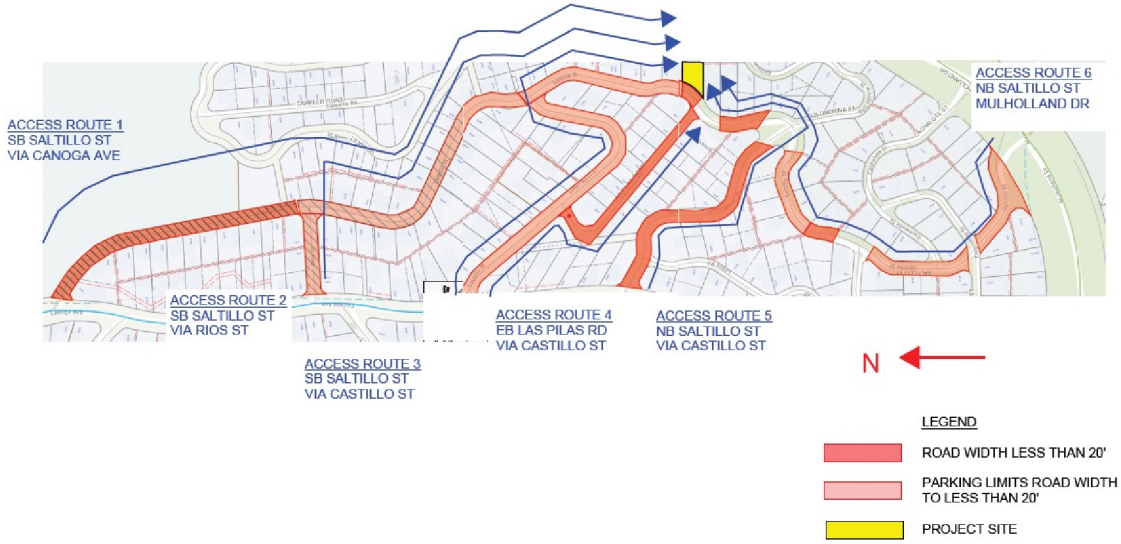
REGISTERED PROFESSIONAL ENGINEER
BRANDON ARAUJO
No. 75996
CIVIL
STATE OF CALIFORNIA

Attachments

1) Exhibits
2) State Minimum Fire Safe Regulations, Article 2, Ingress and Egress
3) Brandon Araujo's Resume

"ACCESS TO THE PROJECT DOES NOT COMPLY WITH MINIMUM FIRE SAFE REGULATIONS AS THEY PERTAIN TO ARTICLE 2, INGRESS AND EGRESS" – WIDTH

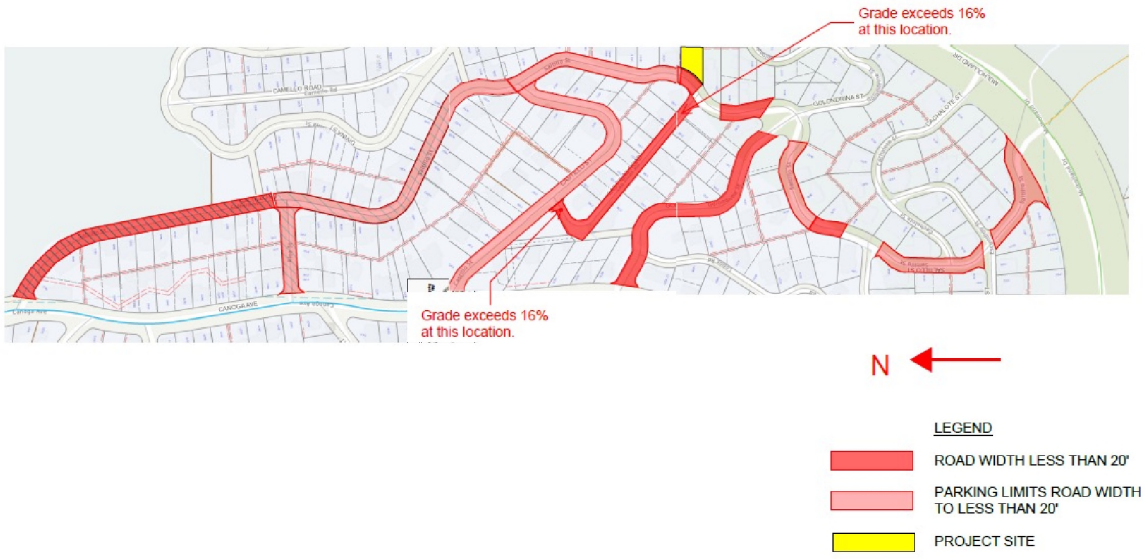
BRANDON ARAUJO, P.E.



Each of the six routes to the Project do not meet the Regulations requirements with respect to Ingress and Egress. Moreover, I have reviewed the Letter of Determination issued by the City on December 19, 2024, and do not see any special conditions imposed by the City to provide the "Same Practical Effect" as defined in Section 1270.1 of the Regulations. Therefore, access to the Project does not comply with the Regulations and, consequently, the Project does not comply with LAMC Section 57.4908.

"ACCESS TO THE PROJECT DOES NOT COMPLY WITH MINIMUM FIRE SAFE REGULATIONS AS THEY PERTAIN TO ARTICLE 2, INGRESS AND EGRESS" – GRADE

BRANDON ARAUJO, P.E.



Access to the Project via Las Pilas Road via Castillo Street does not comply since the presence of parking on Castillo Street limits the width of the roadway dedicated to two-way traffic flow to less than 20 feet, the width of Las Pilas Road is less than 20 feet, and the grade of Las Pilas Road exceeds 16 percent in multiple locations without any evidence of the City providing mitigations to provide for Same Practical Effect



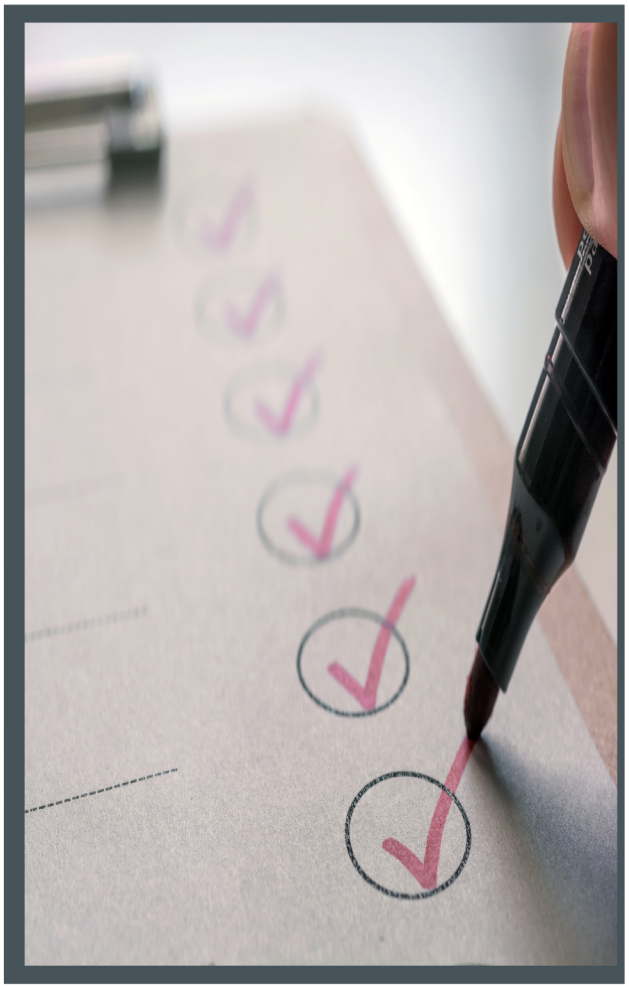
"The request is in conformity with the public necessity, convenience, general welfare, and good zoning practice and that the action will be in substantial conformance with the various elements and objectives of the General Plan."

"The project will enhance the built environment in the surrounding neighborhood or will perform a function or provide a service that is essential or beneficial to the community, city or region."

"The project's location, size, height, operations and other significant features will be compatible with and will not adversely affect or further degrade adjacent properties, the surrounding neighborhood, or the public health, welfare and safety."

"The request is in conformity with the public necessity, convenience, general welfare, and good zoning practice and that the action will be in substantial conformance with the various elements and objectives of the General Plan."

THE CITY CANNOT MAKE THE REQUIRED FINDINGS DUE TO THE PROJECT'S INCONSISTENCY WITH STATE MINIMUM FIRE SAFE REGULATIONS



The City **cannot approve the Project** because it **fails to comply with the State Minimum Fire Safe Regulations**.

Failure to meet critical fire safety standards—specifically the requirement for a **20-foot-wide roadway for emergency and evacuation access**—is detrimental to public health, welfare, and safety.

Therefore, granting the entitlement would:

- **Adversely affect and degrade** adjacent properties and the neighborhood.
- **Not be beneficial** to the community, City, or region.
- **Not be in conformity** with good zoning practice or public necessity, as it is inconsistent with state law designed to protect life during wildfires.

In short, the Project's non-compliance with state fire safety law **necessitates a finding that it will be detrimental to public welfare and injurious to others.**

THE PROJECT DOES NOT COMPLY WITH CHAPTER 49 OF THE CALIFORNIA FIRE CODE

REQUIREMENTS FOR WILDLAND-URBAN INTERFACE FIRE AREAS

- THE LANDSCAPE PLAN DOES NOT DEMONSTRATE COMPLIANCE WITH CHAPTER 49 (WUI FIRE AREAS)
  - ➢ The Project's planting plan contains none of the required elements
  - ➢ Without dimensioned spacing, Chapter 49 compliance cannot be verified

A finding of "no impact" or "less than significant impact" cannot be relied on or supported by on the submitted materials.

The record lacks:

- measurable plan sheets,
- a valid environmental baseline,
- defensible-space documentation, and
- verifiable biological constraints.

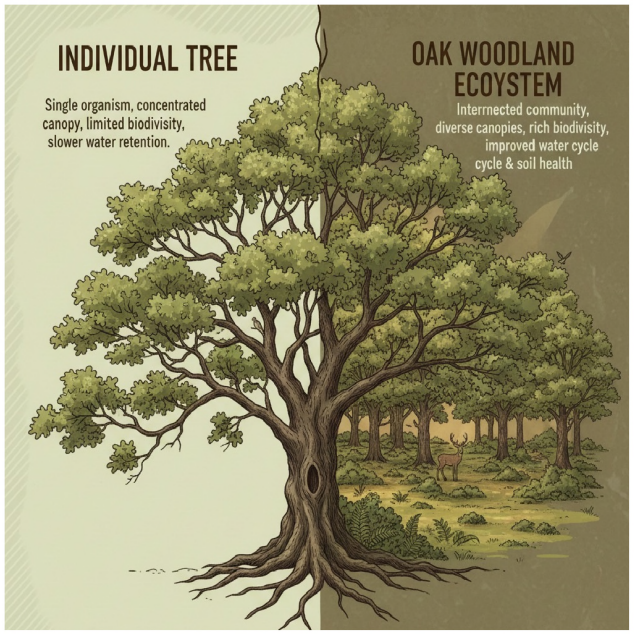
For these reasons:

- Further environmental review is required,
- A revised and updated Protected Tree Report must be prepared,
- Full-size, scaled drawings must be provided

Expert Report, Diana Nicole Zogran, MS

THE CITY HAS FAILED TO CONDITION THE PROJECT TO ENSURE ADEQUATE MITIGATION FOR IMPACTS TO AN OAK WOODLAND

THEREFORE, THE PROJECT IS NOT EXEMPT FROM CEQA AS A CLASS 3 PROJECT



Sometimes trees are more than just trees…

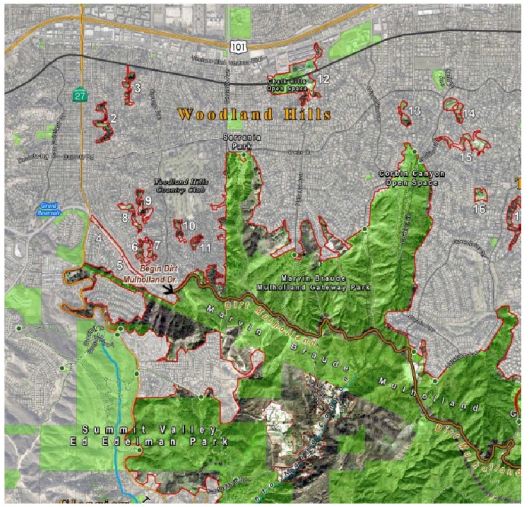
- The Project will remove **2 of the 9 oak trees** on the site.
- This removal is considered a **significant effect** on the environment due to the **permanent loss of sensitive resource habitat**.
- The city's **tree replacement requirements** are deemed insufficient because they **do not replace the oak woodland habitat** itself, nor do they account for the **temporal loss** (time until new trees mature) or the **permanent loss of habitat and biodiversity**.
- The project's building footprint will **forever remove habitat**, and replacing individual trees does not counteract this loss of the overall woodland ecosystem.
- **Bottom Line:** Tree replacements *alone* did not mitigate for loss of oak woodland area.

LOCATION OF THE PROJECT IN SANTA MONICA MOUNTAIN ZONE PREVENTS CITY FROM DEEMING PROJECT EXEMPT FROM CEQA

THEREFORE, THE PROJECT IS NOT EXEMPT FROM CEQA AS A CLASS 3 PROJECT

- The Legislature has declared that the Zone is an environmental resource of critical concern Designated and Mapped Pursuant to State Law.
- The Zone was established by the Legislature via the Santa Monica Mountains Conservancy Act, which is codified at Section 33001 of the Public Resources Code.

Santa Monica Mountains Conservancy



33001. The Legislature hereby finds and declares that the Santa Monica Mountains Zone, as defined in Section 33105, is a unique and valuable economic, environmental, agricultural, scientific, educational, and recreational resource that should be held in trust for present and future generations; that, as the last large undeveloped area contiguous to the shoreline within the greater Los Angeles metropolitan region, comprised of Los Angeles and Ventura Counties, it provides essential relief from the urban environment; that it exists as a single ecosystem in which changes that affect one part may also affect all other parts; and that the preservation and protection of this resource is in the public interest.

THE PROJECT IS NOT EXEMPT FROM CEQA DUE TO UNUSUAL CIRCUMSTANCES

THEREFORE, THE PROJECT IS NOT EXEMPT FROM CEQA AS A CLASS 3 PROJECT

- The Presence of a Coast Live Oak Woodland is an Unusual Circumstance.
- Here, the unusual circumstances is the existence of a Coast Live Oak Woodland (*Qeurcus agrifolia*) on the site which the Project would negatively impact.
- <u>This tree is a locally protected species</u>.
- The City Council's findings and the implementing City's official CEQA Thresholds Guide constitute an authorized and definitive legislative finding that this particular project's special circumstances would have a significant impact on biological resources.



THE CITY OWES A DUTY TO CONSULT WITH CDFW AND FAILED TO DO SO

- A trustee agency "*means a state agency having jurisdiction by law over natural resources affected by a project which are held in trust for the people of the State of California. Trustee agencies include: (a) The California Department of Fish and Game with regard to the fish and wildlife of the state, to designated rare or endangered native plants, and to game refuges, ecological reserves, and other areas administered by the department.*"

California Code of Regulations § 15386

California Department of **Fish and Wildlife**

- There is no question that the Project will impact an Oak Woodland by removing two oak trees within a grove of nine oak trees.
- CDFW clearly has jurisdiction over these natural resources and the City failed to consult with CDFW to determine whether replacement trees alone would adequately mitigate impacts to a woodland (they do not).
- The City has a duty to consult with CDFW.
- Public Resources Code Section 21080.3 states as follows: "*Prior to determining whether a negative declaration or environmental impact report is required for a project, the lead agency shall consult with all responsible agencies and trustee agencies.*"







WAIVER OF REGULATIONS IS A MATTER OF PUBLIC SAFETY

- Concurrent ingress and egress on roads less than 20 feet wide is almost impossible as shown in the above pictures of fire trucks and other first responders attempting to navigate through substandard roads. Developers are often permitted to build projects without requiring any changes to the existing street infrastructure, even in areas identified as high fire risk zones.
- Street access is crucial for firefighting and evacuation efforts. Narrow streets, which are common in older neighborhoods, restrict the movement of large fire trucks and emergency vehicles. During a wildfire, these narrow streets can become a bottleneck, preventing first responders from reaching burning areas quickly, or slowing down evacuations and response times. In a city constantly at risk from wildfires, this failure to require street widening in vulnerable areas is seen as an oversight that exposes the city's residents to further risks.
- One of the most critical issues in addressing fire safety is the need for adequate emergency vehicle access. Fire trucks and emergency vehicles require a wide clearance to navigate safely, particularly in densely populated areas or neighborhoods surrounded by vegetation. Narrow roads often lead to congestion during fires, slowing down response times and complicating evacuations.

The 2025 Pacific Palisades Fire is a stark reminder that Los Angeles is situated in a region extremely prone to wildfire

The City must adhere to the State Minimum Fire Safe Regulations under these dire circumstances



Concluding Thoughts

- The Project does not comply with the State Minimum Fire Safe Regulations because Saltillo Street is less than 20 feet wide.

- This Project is also subject to the State Minimum Fire Regulations because it's located in a VHFHSZ and requires a "building permit for new construction not relating to an existing structure."

- As a result of the Project's inconsistency with these regulations, the ZA erred in making its findings to grant the requested entitlements on December 19, 2024 and approve the Project.

- The Project is not exempt from CEQA because the Project will have a significant effect on the environment.

Channel Law Group, LLP

March 9, 2026

Justification for CEQA Appeal;
4230 N. Saltillo Street; Case Nos.: ZA-2023-1206-ZAD-DRB-SPP-MSP-HCA; ENV-2023-1207-CE ("Project")

EXHIBIT D

Expert Report by Brandon Araujo, P.E.

December 1, 2025 Project Number 25-03

Attention: Jamie Hall
Channel Law Group
8383 Wilshire Boulevard, Suite 750
Beverly Hills, CA 90211

SUBJECT: State Minimum Fire Safe Regulations Ingress and Egress Requirements and 4320 Saltillo Street

Dear Mr. Hall,

Pursuant to your request, I have performed a field investigation of roadway access to the proposed development project at 4320 Saltillo Street ("Project") with respect to the State Minimum Fire Safe Regulations ("Regulations"), specifically as they pertain to Article 2, Ingress and Egress, and Los Angeles Municipal Code ("LAMC") Section 57.4908 and document any deficiencies. This report presents the findings of my investigation.

EXECUTIVE SUMMARY

The Project is located in the central region of the City of Los Angeles ("City") in the San Fernando Valley. Channel Law Group has hired Brandon Araujo, a professional Civil Engineer registered in the State of California, to conduct a field investigation of roadway access to the Project and prepare a report as to whether roadway access meets the requirements as set forth in California Code of Regulations, Title 14 Natural Resources, Division 1.5 – Department of Forestry and Fire Protection, Chapter 7 – Fire Protection, Subchapter 2 – State Minimum Fire Safe Regulations, Article 2 – Ingress and Egress and incorporated in LAMC Section 57.4908.

Upon completion of his field investigation, Mr. Araujo determined that roadway access to the Project does not meet the Regulations with respect to width and grade and, as such, the Project does not comply with the LAMC Section 57.4908.

See **Exhibit 1, Overview of Roadway Deficiencies,** for an overview of the deficiencies documented in this report. This exhibit, and all other exhibits referenced in this report, can be found in **Attachment 1**.

BACKGROUND

The Project (APN 2172-023-053) is located in the San Fernando Valley region of the City. See **Exhibit 1** for an overview of the location of Project. The Project is located in a designated Very High Fire Hazard Severity Zone.

Channel Law Group hired Brandon Araujo, P.E. to conduct a field investigation and evaluate access to the Project with respect to Article 2, Ingress and Egress, of the Regulations and document any instances where roadway access did not meet the standards set forth therein. The text of the Regulations, as provided by the State of California's Office of Administrative Law, can be found in **Attachment 2**.

PROFESSIONAL CREDENTIALS

Mr. Araujo is a professional Civil Engineer registered in the State of California and has been licensed since January 2010. He has extensive experience reviewing street improvement plans prepared for the public right-of-way and evaluating them based on established standards. He also has extensive experience performing field investigations of public roadway facilities to document existing roadway geometric and/or traffic deficiencies and verifying their compliance with approved plans or established standards. See **Attachment 3** for his resume.

METHODOLOGY

Mr. Araujo conducted a field investigation in a manner consistent with the level of care and skill exercised by members of his profession currently practicing under similar conditions in the Southern California area. His investigation took place on Saturday, April 12, 2025 and Sunday, November 23, 2025. Distances less than 25 feet were measured with a measuring tape, distances greater than 25 feet were measured with a measuring wheel along the ground, and grades were measured with a digital level. Per Section 1270.08, Distance Measurements, of the Regulations "all specified or referenced distances are measured along the ground, unless otherwise stated." Mr. Araujo evaluated six access routes to the Project with respect to the Regulations:

1) Southbound Saltillo Street via Canoga Avenue
2) Southbound Saltillo Street via Rios Street
3) Southbound Saltillo Street via Castillo Street
4) Las Pilas Road via Castillo Street
5) Northbound Saltillo Street via Golondrina Street
6) Northbound Saltillo Street via Mulholland Drive

See **Exhibit 2** for an overview of each access route evaluated.

FINDINGS

Existing Conditions

Below you will find a summary of each of the existing conditions of the roads evaluated in the access routes listed above. Mr. Araujo observed low traffic volumes traveling in both directions of travel at speeds varying from 10 to 25 miles per hour. Unless otherwise noted, all roads are paved with asphalt concrete and serve motor vehicles driving to and from single family residential homes.

Saltillo Street

Saltillo Street's northern terminus is located at the intersection of Canoga Avenue and Saltillo Street. Saltillo Street's southern terminus is located at the intersection of Mulholland Drive and Saltillo Street.

The segment of Saltillo Street from Canoga Avenue to Rios Street ("Segment 1") measures approximately 860 feet long. Saltillo Street lacks curb and gutter along this segment on both sides of the road. Its width, as measured from edge of pavement to edge of pavement, varies from 12 feet and 6 inches to 19 feet. There are no regulatory signs installed prohibiting stopping or parking facing southbound traffic. No Parking Any Time signs are installed facing northbound traffic along the northern portion of this roadway approaching Canoga Avenue.

The segment of Saltillo Street from Rios Street to Castillo Street ("Segment 2") measures approximately 840 feet long. While much of Saltillo Street along this segment lacks curb and gutter on both sides of the road, some properties do feature curb and gutter along their frontages (e.g. 4372 Saltillo Street, 4378 Saltillo Street, etc.) Its width, as measured from edge of pavement to edge of pavement or from curb face to curb face, if applicable, is approximately 20 feet. There are no regulatory signs installed prohibiting stopping or parking in the southbound direction. No Parking Any Time signs are installed facing northbound traffic along this entire segment of Saltillo Street.

The segment of Saltillo Street from Castillo Street to Las Pilas Road ("Segment 3") measures approximately 590 feet long. It features asphalt curbs on both sides of the road aside from the frontage along 4320 Saltillo Street which lacks an asphalt curb. Its width, as measured from curb face to curb face, is approximately 20 feet. There are no regulatory signs installed prohibiting stopping or parking in either the south- or northbound directions.

The segment of Saltillo Street from Las Pilas Road to Golondrina Street ("Segment 4") measures approximately 250 feet long. It lacks curb and gutter on both sides of the road. Its width, as measured from edge of pavement to edge of pavement varies from 14 feet to 16 feet and 8 inches. No Parking Any Time signs are installed facing traffic in both the south- or northbound directions.

The segment of Saltillo Street from Golondrina Street to Escondido Street (North) ("Segment 5"), measures approximately 520 feet long. It lacks curb and gutter on both sides of the road. Its width, as measured from curb face to curb face, varies from 16 feet to 20 feet. No Parking signs are installed facing southbound traffic along this entire segment. There are no regulatory signs installed prohibiting stopping or parking in the northbound direction.

The segment of Saltillo Street from Escondido Street (North) to Mulholland Drive ("Segment 6"), measures approximately 750 feet long. It features curb on gutter on both sides of the road. Its width, as measured from curb face to curb face, is approximately 24 feet. There are no regulatory signs installed prohibiting stopping or parking in either the south- or northbound directions.

Rios Street

Rios Street's western terminus is located at the intersection of Canoga Avenue and Rios Street. Rios Street's eastern terminus is located at the intersection of Rios Street and Saltillo Street.

Rios Street lacks a gutter along much of its length on both sides of the road. Its width, as measured from curb face to curb face, measures less than 24 feet. There are no regulatory signs installed prohibiting stopping or parking facing eastbound traffic. No Parking Any Time signs are installed facing westbound traffic.

Castillo Street

Castillo Street's western terminus is located at the intersection of Canoga Avenue and Castillo Street. Castillo Street's eastern terminus is located at the intersection of Castillo Street and Saltillo Street.

Castillo Street lacks a gutter along much of its length on both sides of the road. Its width, as measured from curb face to curb face, measures approximately 20 feet. No Parking Any Time signs are installed facing eastbound traffic. There are no regulatory signs installed prohibiting stopping or parking facing westbound traffic.

Las Pilas Road

Las Pilas Road's western terminus is located at the intersection of Castillo Street and Las Pilas Road. Las Pilas Road's eastern terminus is located at the intersection of Las Pilas Road and Saltillo Street.

Las Pilas Road lacks a gutter along much of its length on both sides of the road. Its width, as measured from curb face to curb face, measures 16 to 18 feet. No Parking Any Time signs are installed facing both directions of traffic.

Golondrina Street, from Canoga Avenue to Saltillo Street

This segment of Golondrina Street's western terminus is located at the intersection of Canoga Avenue and Golondrina Street. The eastern terminus of this segment is located at the intersection of Golondrina Street and Saltillo Street.

Golondrina Street, from Canoga Avenue to Saltillo Street, lacks a gutter along much of its length on both sides of the road. Its width, as measured from curb face to curb face, measures approximately 18 feet. No Parking Any Time signs are installed facing both directions of traffic.

Facility Determinations

Article 2 of the Regulations refers to three different types of facilities: driveways, one-way roads, and two-way roads.

Section 1270.01(i) of the Regulations defines a "driveway" as follows: "A vehicular pathway that serves no more than four (4) Residential Units and any number of non-commercial or non-industrial Utility or Miscellaneous Group U Buildings on each parcel. A Driveway shall not serve commercial or industrial uses at any size or scale." A "road," on the other hand, is defined in Section 1270.01(y) as follows: "A public or private vehicular pathway to more than four (4) Residential Units, or to any industrial or commercial Occupancy."

Since the five roadways evaluated (i.e. Saltillo Street, Rios Street, Castillo Street, Las Pilas Road, and Golondrina Street) are public vehicular pathways to more than four (4) Residential Units based on my personal observations and review of the number of homes utilizing the City's Zone Information and Map Access System ("ZIMAS"), they cannot be considered driveways as defined by the Regulations.

For all five roadways evaluated, traffic control signs are installed facing both directions of traffic consistent with a two-way road. In addition, since there are no traffic signs nor pavement

markings nor physical barriers prohibiting or discouraging motor vehicle travel in either direction, none of the five roadways can be considered a one-way road.

Since all five roadways are public vehicular pathways to more than four residential units and serve traffic in the both directions, each was evaluated based on the Regulations' requirements for a two-way road.

Types of Deficiencies

In my evaluation, I found two types of deficiencies: deficiencies with respect to the Regulations' requirements for road width and road grade. The requirements for a two-way road are found in Section 1273.01(a) of the Regulations. Section 1273.01(a) states:

> All roads shall be constructed to provide a minimum of two ten (10) foot traffic lanes, not including shoulder and striping. These traffic lanes shall provide for two-way traffic flow to support emergency vehicle and civilian egress, unless other standards are provided in this article or additional requirements are mandated by Local Jurisdictions or local subdivision requirements.

The requirements for grade are found in Section 1273.03 of the Regulations. Section 1273.03 states:

> (a) At no point shall the grade for all Roads and Driveways exceed 16 percent.
> (b) The grade may exceed 16%, not to exceed 20%, with approval from the Local Jurisdiction and with mitigations to provide for Same Practical Effect.[1]"

//

//

//

//

[1] Same Practical Effect is defined in Section 1270.1 of the Regulations:

> As used in this subchapter, means an Exception or alternative with the capability of applying accepted wildland fire suppression strategies and tactics, and provisions for fire fighter safety, including:
> (1) access for emergency wildland fire equipment,
> (2) safe civilian evacuation,
> (3) signing that avoids delays in emergency equipment response,
> (4) available and accessible water to effectively attack Wildfire or defend a Structure from Wildfire, and
> (5) fuel modification sufficient for civilian and fire fighter safety.

ACCESS ROUTE DEFICIENCIES

Access Route 1: Southbound Saltillo Street via Canoga Avenue

Segment 1 of Saltillo Street varies in width from 12 and a half feet to 16 and a half feet. The amount of width provided along this segment is less than the 20 feet required. See **Exhibit 3.1** for a photograph of this segment of Saltillo Street looking westward.

Segment 2 of Saltillo Street measures approximately 20 feet in width. However, parking is permitted in the southbound direction. The presence of parked vehicles reduces the available road width to traffic by 8 feet. Hence, the amount of width provided along this segment is less than the 20 feet required. See **Exhibit 3.2** for a photograph of this segment of Saltillo Street looking southward.

Segment 3 of Saltillo Street measures approximately 20 feet in width. However, parking is permitted in the both the south- and northbound directions. The presence of parked vehicles reduces the available road width to traffic by 8 feet. Hence, the amount of width provided along this segment is less than the 20 feet required. See **Exhibit 3.3** for a photograph of this segment of Saltillo Street looking southward.

Since this access route does not provide a minimum of two ten (10) foot traffic lanes that provide for two-way traffic flow to support emergency vehicle and civilian egress, this access route does not meet the Regulations' requirements with respect to width and, consequently, does not comply with LAMC Section 57.4908.

Access Route 2: Southbound Saltillo Street via Rios Street

As stated above, while Segments 2 and 3 of Saltillo Street measure approximately 20 feet in width, the presence of parked vehicles along either of these segments reduces the available roadway by 8 feet.

Rios Street measures approximately 24 feet in width. However, parking is permitted in the eastbound direction of travel (along the south side of the road). The presence of parked vehicles reduces the available road width to traffic by 8 feet. Hence, the amount of width provided along Rios Street is less than the 20 feet required. See **Exhibit 3.4** for a photograph of this segment of Rios Street looking westward.

Since this access route does not provide a minimum of two ten (10) foot traffic lanes that provide for two-way traffic flow to support emergency vehicle and civilian egress, this access route does

not meet the Regulations' requirements with respect to width and, consequently, does not comply with LAMC Section 57.4908.

Access Route 3: Southbound Saltillo Street via Castillo Street

As stated under Access Route 1, while Segment 3 of Saltillo Street measure approximately 20 feet in width, the presence of parked vehicles reduces the available roadway by 8 feet.

Castillo Street measures approximately 20 feet in width. However, parking is permitted in the westbound direction of travel (along the north side of the road). The presence of parked vehicles reduces the available road width to traffic by 8 feet. Hence, the amount of width provided along Castillo Street is less than the 20 feet required. See **Exhibit 3.5** for a photograph of this segment of Castillo Street looking westward.

Since this access route does not provide a minimum of two ten (10) foot traffic lanes that provide for two-way traffic flow to support emergency vehicle and civilian egress, this access route does not meet the Regulations' requirements with respect to width and, consequently, does not comply with LAMC Section 57.4908

Access Route 4: Las Pilas Road via Castillo Street

Las Pilas Road varies in width from 16 feet to 18 feet. The amount of width provided along this segment is less than the 20 feet required. See **Exhibit 3.6** for a photograph of Las Pilas Road looking westward.

Furthermore, during the field investigation, Las Pilas Road was found to have a grade in excess of 16 percent at two locations: one location is found near the intersection of Las Pilas Road and Castillo Street, the second location is found in front of 21318 Las Pilas Road. Photographs showing the grade in excess of 16 percent at these locations are provided in **Exhibits 3.7** and **3.8**, respectively.

Since Las Pilas Road does not provide a minimum of two ten (10) foot traffic lanes that provide for two-way traffic flow to support emergency vehicle and civilian egress and its grade exceeds the 16 percent without any evidence of the City providing mitigation for Same Practical Effect, this access route does not meet the Regulations' requirements with respect to width and grade and, consequently, does not comply with LAMC Section 57.4908

Access Route 5: Northbound Saltillo Street via Golondrina Street

Segment 4 of Saltillo Street varies in width from 14 feet to 18 feet. The amount of width provided along this segment is less than the 20 feet required. See **Exhibit 3.9** for a photograph of this segment of Saltillo Street looking southward.

Golondrina Street measures approximately 18 feet in width. The amount of width provided along this segment is less than the 20 feet required. See **Exhibit 3.10** for a photograph of Golondrina Street looking eastward.

Since this access route does not provide a minimum of two ten (10) foot traffic lanes that provide for two-way traffic flow to support emergency vehicle and civilian egress, this access route does not meet the Regulations' requirements with respect to width and, consequently, does not comply with LAMC Section 57.4908.

Access Route 6: Northbound Saltillo Street via Mulholland Drive

Segment 6 of Saltillo Street measures approximately 24 feet in width. However, parking is permitted in the both the north- and southbound directions. The presence of parked vehicles reduces the available road width to traffic by 8 feet. Hence, the amount of width provided along this segment is less than the 20 feet required. See **Exhibit 3.11** for a photograph of this segment of Saltillo Street looking southbound.

Segment 5 of Saltillo Street measures up to 20 feet in width. The frontage in front of 4170 Saltillo Street is approximately 16 feet wide. See **Exhibit 3.12** for a photograph of Saltillo Street in front of 4170 Saltillo Street looking southward. The remainder of Segment 5 north of 4170 Saltillo Street is approximately 20 feet wide, but the presence of parking reduces the amount of width provided along this segment to less than the 20 feet required.

Since this access route does not provide a minimum of two ten (10) foot traffic lanes that provide for two-way traffic flow to support emergency vehicle and civilian egress, this access route does not meet the Regulations' requirements with respect to width and, consequently, does not comply with LAMC Section 57.4908.

//

//

//

CONCLUSION

Access to the Project does not comply with the State Minimum Fire Safe Regulations as they pertain to Article 2, Ingress and Egress.

Specifically, access to the Project via southbound Saltillo Street via Canoga Avenue does not comply since the width of Segment 1 of Saltillo Street is less than 20 feet and the presence of parking on Segments 2 and 3 limits the width of roadway dedicated to two-way traffic flow to less than 20 feet.

Access to the Project via southbound Saltillo Street via Rios Street does not comply since the presence of parking on Saltillo Street and Rios Street limits the width of the roadway dedicated to two-way traffic flow to less than 20 feet.

Access to the Project via southbound Saltillo Street via Castillo Street does not comply since the presence of parking on Saltillo Street and Castillo Street limits the width of the roadway dedicated to two-way traffic flow to less than 20 feet.

Access to the Project via Las Pilas Road via Castillo Street does not comply since the presence of parking on Castillo Street limits the width of the roadway dedicated to two-way traffic flow to less than 20 feet, the width of Las Pilas Road is less than 20 feet, and the grade of Las Pilas Road exceeds 16 percent in multiple locations without any evidence of the City providing mitigations to provide for Same Practical Effect

Access to the Project via northbound Saltillo Street via Golondrina Street does not comply since the width of Golondrina Street is less than 20 feet and the width of a segment of Saltillo Street south of the project is less than 20 feet.

Access to the Project via northbound Saltillo Street via Mulholland Drive does not comply with the Regulations since multiple segments of Saltillo Street north of Escondido Street (North) have a width of less than 20 feet and the presence of parking on Saltillo Street from Escondido Street (North) to Mulholland Drive limits the width of the roadway dedicated to two-way traffic flow to less than 20 feet.

Each of the six routes to the Project do not meet the Regulations requirements with respect to Ingress and Egress. Moreover, I have reviewed the Letter of Determination issued by the City on December 19, 2024, and do not see any special conditions imposed by the City to provide the "Same Practical Effect" as defined in Section 1270.1 of the Regulations. Therefore, access to the Project does not comply with the Regulations and, consequently, the Project does not comply with LAMC Section 57.4908.

If you have any further questions, please let me know.

Sincerely,



Brandon Araujo, P.E.
R.C.E 75996

Attachments

1) Exhibits
2) State Minimum Fire Safe Regulations, Article 2, Ingress and Egress
3) Brandon Araujo's Resume

ATTACHMENT 1

EXHIBITS

Exhibit 1

Overview of Roadway Deficiencies

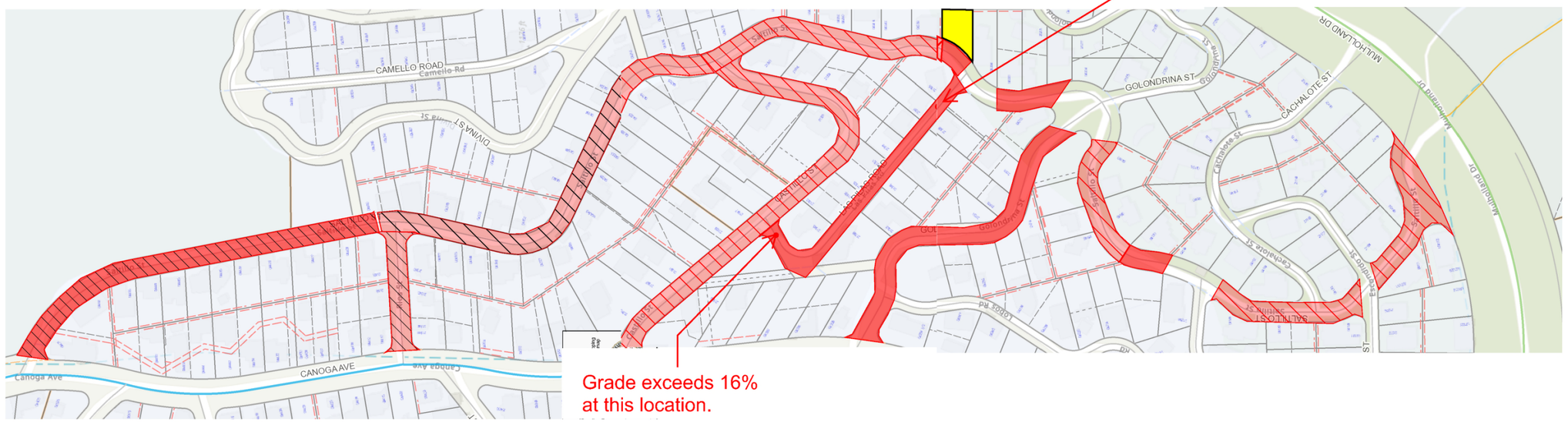


Exhibit 1 - Overview of Roadway Deficiencies

Exhibit 2

Overview of Access Routes

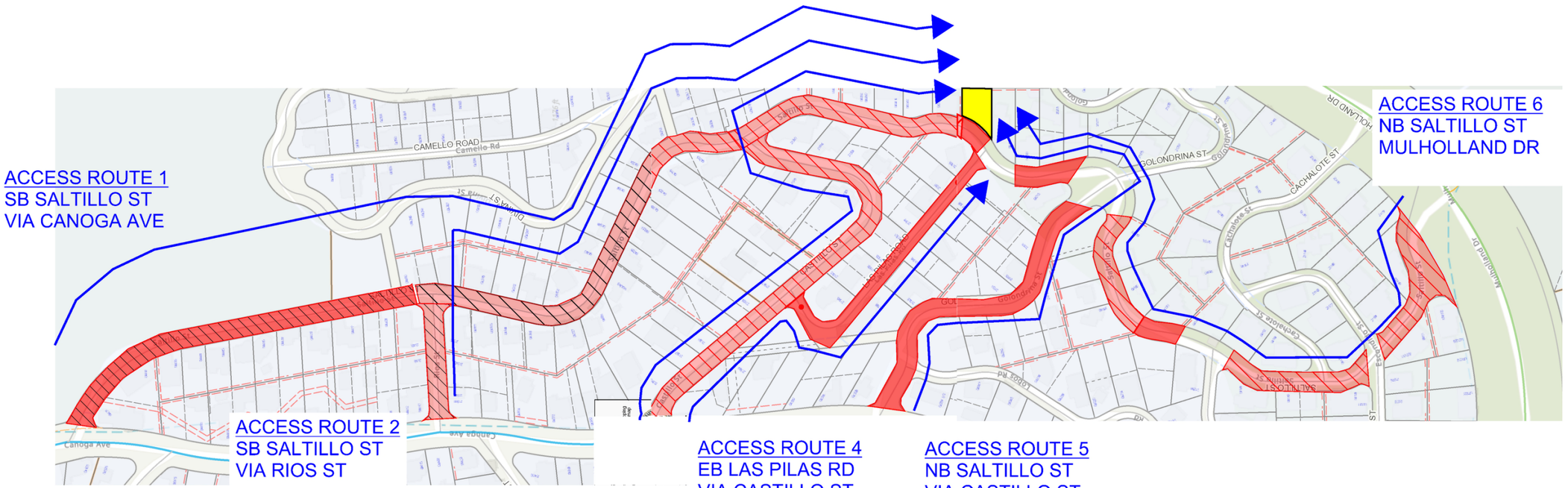


Exhibit 2 - Overview of Access Routes

Exhibit 3.1

Photograph of Saltillo Street – Segment 1 Looking Westward



Exhibit 3.1: Photograph of Saltillo Street – Segment 1 Looking Westward

Exhibit 3.2

Photograph of Saltillo Street – Segment 2 Looking Southward



Exhibit 3.2: Photograph of Saltillo Street – Segment 2 Looking Southward

Exhibit 3.3

Photograph of Saltillo Street – Segment 3 Looking Southward



Exhibit 3.3: Photograph of Saltillo Street – Segment 3 Looking Southward

Exhibit 3.4

Photograph of Rios Street Looking Westward



Exhibit 3.4: Photograph of Rios Street Looking Westward

Exhibit 3.5

Photograph of Castillo Street Looking Westward



Exhibit 3.5: Photograph of Castillo Street Looking Westward

Exhibit 3.6

Photograph of Las Pilas Road Looking Westward



Exhibit 3.6: Photograph of Las Pilas Road Looking Westward

Exhibit 3.7

Photograph of Digital Level on Las Pilas Road Near Its Intersection with Castillo Street



Exhibit 3.7: Photograph of Digital Level on Las Pilas Road Near Its Intersection with Castillo Street

Exhibit 3.8

Photograph of Digital Level In Front of 21318 Las Pilas Road



Exhibit 3.8: Photograph of Digital Level In Front of 21318 Las Pilas Road

Exhibit 3.9

Photograph of Saltillo Street - Segment 4 Looking Southward



Exhibit 3.9: Photograph of Saltillo Street – Segment 4 Looking Southward

Exhibit 3.10

Photograph of Golondrina Street Looking Eastward

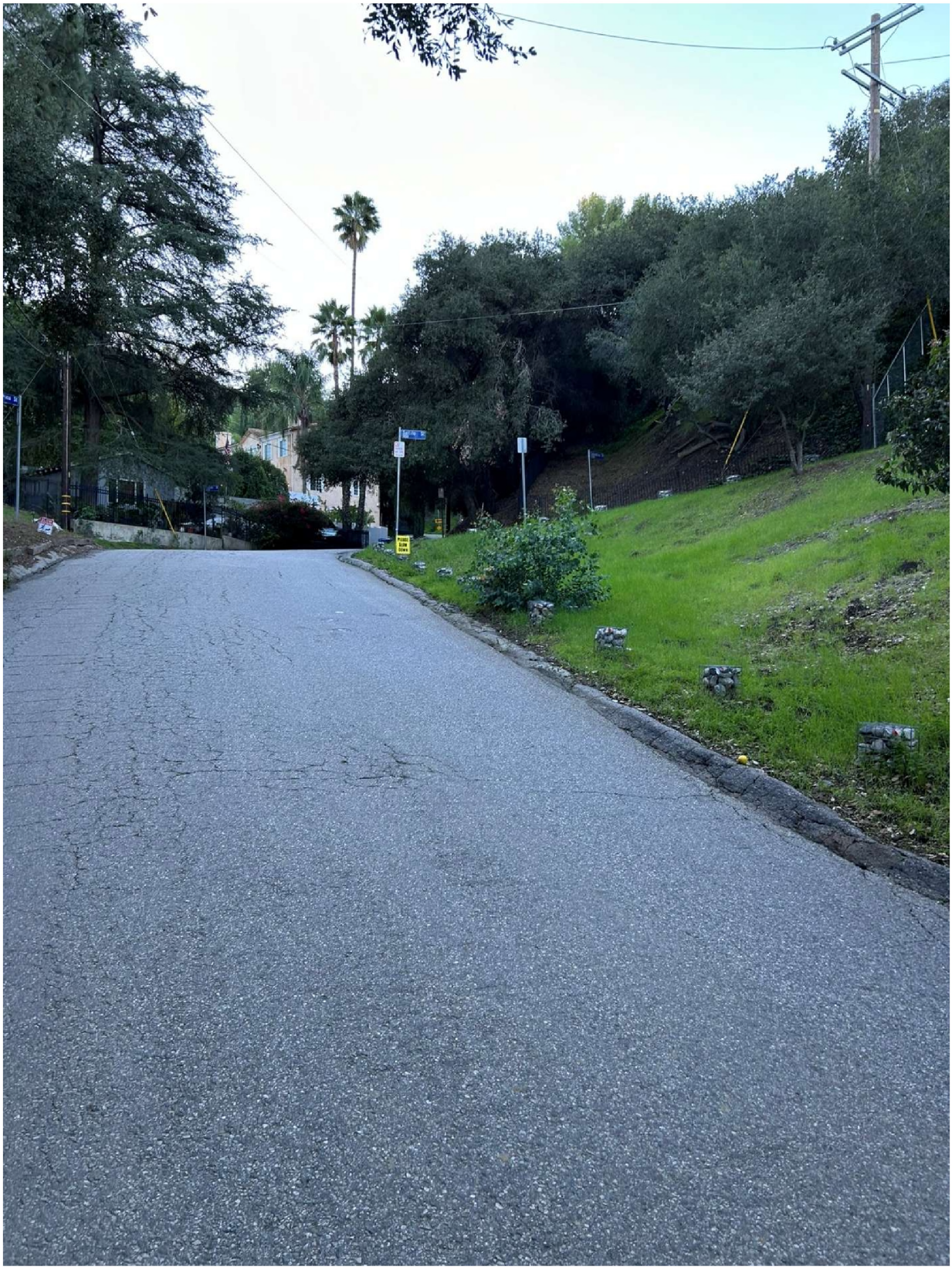


Exhibit 3.10: Photograph of Golondrina Street Looking Eastward

Exhibit 3.11

Photograph of Saltillo Street – Segment 6 Looking Southbound



Exhibit 3.11: Photograph of Saltillo Street – Segment 6 Looking Southbound

Exhibit 3.12

Photograph of Saltillo Street In Front of 4170 Saltillo Street Looking Southward



Exhibit 3.12: Photograph of Saltillo Street In Front of 4170 Saltillo Street Looking Southward

ATTACHMENT 2

State Minimum Fire Safe Regulations
Article 2, Ingress and Egress

California Code of Regulations
Title 14 Natural Resources
Division 1.5 – Department of Forestry and Fire Protection
Chapter 7 – Fire Protection
Subchapter 2 – State Minimum Fire Safe Regulations
Article 2 – Ingress and Egress
§ 1273.00 - Intent
§ 1273.01 - Width
§ 1273.02 - Road Surface
§ 1273.03 - Grades
§ 1273.04 - Radius
§ 1273.05 - Turnarounds
§ 1273.06 - Turnouts
§ 1273.07 - Road and Driveway Structures
§ 1273.08 - Dead-End Roads
§ 1273.09 - Gate Entrances

§ 1273.00 - Intent
Roads, and Driveways, whether public or private, unless exempted under 14 CCR § 1270.03(d), shall provide for safe access for emergency Wildfire equipment and civilian evacuation concurrently, and shall provide unobstructed traffic circulation during a Wildfire emergency consistent with 14 CCR §§ 1273.00 through 1273.09.

§ 1273.01 - Width
(a) All roads shall be constructed to provide a minimum of two ten (10) foot traffic lanes, not including shoulder and striping. These traffic lanes shall provide for two-way traffic flow to support emergency vehicle and civilian egress, unless other standards are provided in this article or additional requirements are mandated by Local Jurisdictions or local subdivision requirements. Vertical clearances shall conform to the requirements in California Vehicle Code section 35250.
(b) All One-way Roads shall be constructed to provide a minimum of one twelve (12) foot traffic lane, not including Shoulders. The Local Jurisdiction may approve One-way Roads.
(1) All one-way roads shall, at both ends, connect to a road with two traffic lanes providing for travel in different directions, and shall provide access to an area currently zoned for no more than ten (10) Residential Units.
(2) In no case shall a One-way Road exceed 2,640 feet in length. A turnout shall be placed and constructed at approximately the midpoint of each One-way Road.
(c) All driveways shall be constructed to provide a minimum of one (1) ten (10) foot traffic lane, fourteen (14) feet unobstructed horizontal clearance, and unobstructed vertical clearance of thirteen feet, six inches (13' 6").

§ 1273.02 - Road Surface
(a) Roads shall be designed and maintained to support the imposed load of Fire Apparatus weighing at least 75,000 pounds, and provide an aggregate base.
(b) Road and Driveway Structures shall be designed and maintained to support at least 40,000 pounds.
(c) Project proponent shall provide engineering specifications to support design, if requested by the Local Jurisdiction.

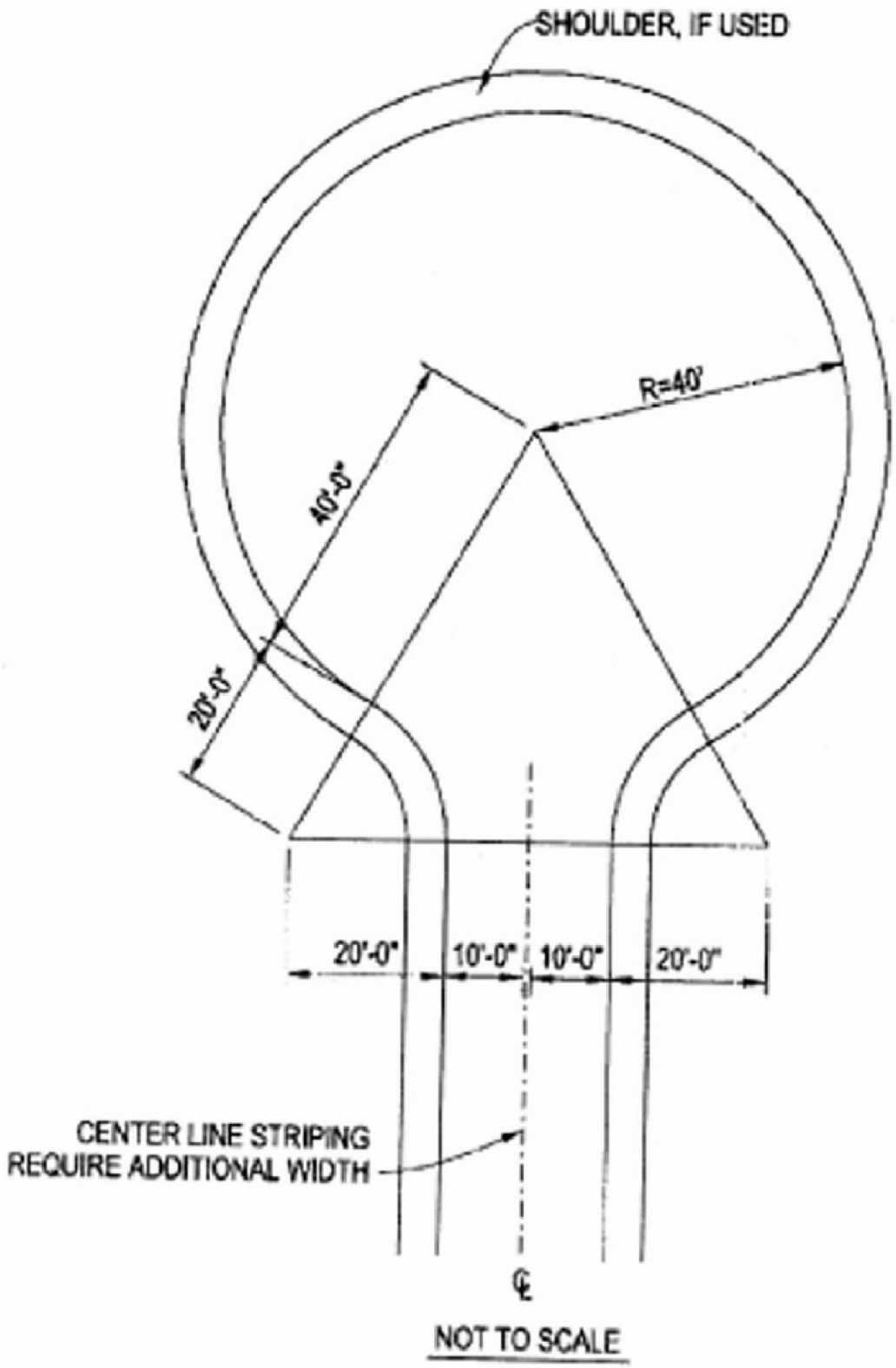
§ 1273.03 - Grades
(a) At no point shall the grade for all Roads and Driveways exceed 16 percent.
(b) The grade may exceed 16%, not to exceed 20%, with approval from the Local Jurisdiction and with mitigations to provide for Same Practical Effect.

§ 1273.04 – Radius

(a) No Road or Road Structure shall have a horizontal inside radius of curvature of less than fifty (50) feet. An additional surface width of four (4) feet shall be added to curves of 50-100 feet radius; two (2) feet to those from 100-200 feet.
(b) The length of vertical curves in *Roadway*s, exclusive of gutters, ditches, and drainage structures designed to hold or divert water, shall be not less than one hundred (100) feet.

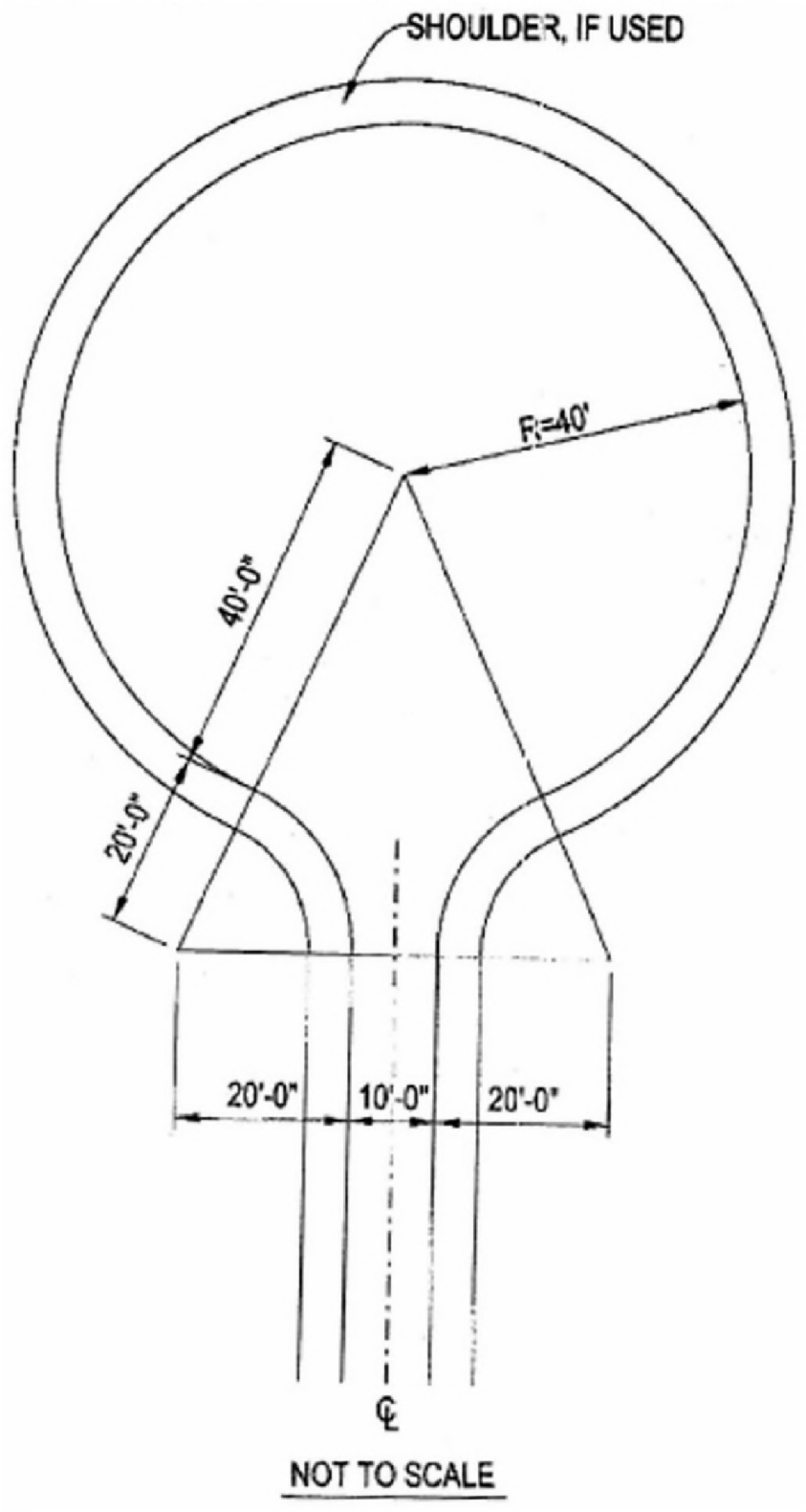
§ 1273.05 – Turnarounds
(a) Turnarounds are required on Driveways and Dead-end Roads.
(b) The minimum turning radius for a turnaround shall be forty (40) feet, not including parking, in accordance with the figures in 14 CCR §§ 1273.05(e) and 1273.05(f). If a hammerhead/T is used instead, the top of the "T" shall be a minimum of sixty (60) feet in length.
(c) Driveways exceeding 150 feet in length, but less than 800 feet in length, shall provide a turnout near the midpoint of the Driveway. Where the driveway exceeds 800 feet, turnouts shall be provided no more than 400 feet apart.
(d) A turnaround shall be provided on Driveways over 300 feet in length and shall be within fifty (50) feet of the building.
(d) Each Dead-end Road shall have a turnaround constructed at its terminus. Where parcels are zoned five (5) acres or larger, turnarounds shall be provided at a maximum of 1,320 foot intervals.

(e) Figure A. Turnarounds on roads with two ten-foot traffic lanes.
Figure A/Image 1 is a visual representation of paragraph (b).



(f) Figure B. Turnarounds on driveways with one ten-foot traffic lane.

Figure B/Image 2 is a visual representation of paragraph (b).



§ 1273.06 – Turnouts
Turnouts shall be a minimum of twelve (12) feet wide and thirty (30) feet long with a minimum twenty-five (25) foot taper on each end.

§ 1273.07 - Road and Driveway Structures
(a) Appropriate signing, including but not limited to weight or vertical clearance limitations, One-way Road or single traffic lane conditions, shall reflect the capability of each bridge.
(b) Where a bridge or an elevated surface is part of a Fire Apparatus access road, the bridge shall be constructed and maintained in accordance with the American Association of State and Highway Transportation Officials Standard Specifications for Highway Bridges, 17th Edition, published 2002 (known as AASHTO HB-17), hereby incorporated by reference. Bridges and elevated surfaces shall be designed for a live load sufficient to carry the imposed loads of fire apparatus. Vehicle load limits shall be posted at both entrances to bridges when required by the local authority having jurisdiction.
(c) Where elevated surfaces designed for emergency vehicle use are adjacent to surfaces which are not designed for such use, barriers, or signs, or both, as approved by the local authority having jurisdiction, shall be installed and maintained.
(d) A bridge with only one traffic lane may be authorized by the Local Jurisdiction; however, it shall provide for unobstructed visibility from one end to the other and turnouts at both ends.

§ 1273.08 - Dead-End Roads
(a) The maximum length of a Dead-end Road, including all Dead-end Roads accessed from that Dead-end Road, shall not exceed the following cumulative lengths, regardless of the number of parcels served:
parcels zoned for less than one acre - 800 feet
parcels zoned for 1 acre to 4.99 acres - 1,320 feet
parcels zoned for 5 acres to 19.99 acres - 2,640 feet
parcels zoned for 20 acres or larger - 5,280 feet
All lengths shall be measured from the edge of the Road surface at the intersection that begins the Road to the end of the Road surface at its farthest point. Where a dead-end road crosses areas of differing zoned parcel sizes requiring different length limits, the shortest allowable length shall apply.
(b) See 14 CCR § 1273.05 for dead-end road turnaround requirements.

§ 1273.09 - Gate Entrances
(a) Gate entrances shall be at least two (2) feet wider than the width of the traffic lane(s) serving that gate and a minimum width of fourteen (14) feet unobstructed horizontal clearance and unobstructed vertical clearance of thirteen feet, six inches (13' 6").

(b) All gates providing access from a Road to a Driveway shall be located at least thirty (30) feet from the roadway and shall open to allow a vehicle to stop without obstructing traffic on that Road.
(c) Where a One-way Road with a single traffic lane provides access to a gated entrance, a forty (40) foot turning radius shall be used.
(d) Security gates shall not be installed without approval. Where security gates are installed, they shall have an approved means of emergency operation. Approval shall be by the local authority having jurisdiction. The security gates and the emergency operation shall be maintained operational at all times.

ATTACHMENT 3

Brandon Araujo's Resume

BRANDON J. ARAUJO, P.E.
(626) 252-1523
brjaraujo@gmail.com

EDUCATION:
Stanford University, Master of Science, Structural Engineering & Geomechanics, June 2008
Stanford University, Bachelor of Science, Civil & Environmental Engineering, June 2007

EXPERIENCE:
City of Hermosa Beach, *Senior Engineer*, Hermosa Beach, CA (05/2024 – PRESENT)
- Project Manager for the complex, multi-agency Greenwich Village Underground Utility Assessment District.
- Prepared, reviewed, interpreted, analyzed, and modified engineering plans, drawings, specifications, contract documents, and engineering reports for conformance to professional standards and approved budgets.
- Possessed excellent organizational skills and ability to manage multiple projects with competing deadlines.
- Administered the Bid & Award phase of projects: issued Notice Inviting Bids, responded to questions, evaluated bids, and recommended project award. Administered contracts after award. Ensured Contractor compliance with the City's contract documents.
- Applied for outside funding for City projects; administered funding and followed reporting requirements as required. Prepared requests for reimbursement and administered grant funds.
- Coordinated assigned activities with other divisions, departments, and outside agencies; attended and participated in professional group meetings.
- Prepared staff reports, and presentation materials, for City Council
- Assisted with, planning, budgeting, and administration of the city-wide Capital Improvement Program, Public Works operating budget, and associated projects.
- Responded to, and resolved, difficult inquiries and complaints from the property owners, contractors, and others regarding Public Works projects and activities.
- Responded to questions and inquiries from a variety of sources regarding department functions.
- Communicated clearly and concisely, both orally and in writing; and established and maintained effective working relationships with those contacted in the course of work.

City of Los Angeles, **Bureau of Engineering**, *Civil Engineer*, Los Angeles, CA (02/2022 – 05/2024)
- Project Manager of a variety of complex Capital Improvement Projects, planned, directed, and coordinated, through subordinates, a variety of complex professional civil engineering assignments related to the delivery of a project portfolio with a construction value of over $100,000,000.
- Served as the project manager on complex Capital Improvement Projects.
- Managed the preparation and performed technical reviews of engineering plans, specifications, construction estimates, and construction bid documents for public works projects.
- Prepared, reviewed, interpreted, analyzed, and modified engineering plans, drawings, specifications, contract documents, and engineering reports for conformance to professional standards and approved budgets.
- Supervised the preparation of special engineering studies and prepared technical reports.
- Possessed excellent organizational skills and the demonstrated the ability to manage multiple projects with competing deadlines.
- Lead, mentored, reviewed, and monitored the work of staff responsible for performing professional engineering work.

- Directed and supervised the technical and administrative work of consultants. Ensured consultant compliance with City standards, specifications, and budget.
- Recommended procedural improvements and modifications.
- Prepared the Bureau's manual on the administration of special assessment and improvement districts.
- Responded to, and resolved, difficult inquiries and complaints from contractors regarding Public Works projects and activities.
- Communicate clearly and concisely, both orally and in writing; and establish and maintain effective working relationships with those contacted in the course of work.

City of Los Angeles, Department of Transportation, Los Angeles, CA (11/2019 – 02/2022)
Transportation Engineer (11/2021-02/2022)
- Transportation Engineer for Vision Zero's Safety Engineering group.
- Worked on implementing lower speed limits throughout the City in response to AB43
- Worked on various policies, programs, and projects to reduce the number of people killed or severely injured in automobile collisions in the City.

Transportation Engineering Associate II (11/2019-11/2021)
- Member of the Metro Programs Division—a one-stop, on-demand service dedicated solely to the Department's review of all of Metro's capital improvement programs within City limits.
- Reviewed, checked, verified, and critiqued the technical validity of Metro's plans to remove and replace all of their transportation system's red light enforcement cameras.
- Communicated effectively, both orally and in writing, with Metro to report the City's findings, explain our positions, and respond to their questions, comments, or concerns.

City of Vernon, *Project Engineer*, Vernon, CA (12/2016 – 11/2019)
- Performed complex professional engineering duties involved in the design and development of the federally-funded Atlantic Boulevard Bridge Widening over the Los Angeles River.
- Prepared, reviewed, interpreted, analyzed, and modified engineering plans, drawings, specifications, contract documents, and engineering reports for conformance to professional standards and approved budgets.
- Possessed excellent organizational skills and ability to manage multiple projects with competing deadlines.
- Issued grading and storm drain permits for private developments as required and ensures\d compliance and conformance with scope of work standards and specifications. Performed inspection of work in the field by contractors and developers for the City's grading and storm drain permits.
- Performed the development, advertising, and selection process for professional services. Evaluated proposals and recommended project award. Negotiated and administered contracts after award. Ensured consultant compliance with City standards, specifications, and budget.
- Applied for outside funding for City projects; administered funding and followed reporting requirements as needed. Prepared and administered grant funds.
- Coordinated assigned activities with other divisions, departments, and outside agencies; attended and participated in professional group meetings.
- Prepared staff reports, and presentation materials, for City Council, Vernon Business and Industry Commission, and other public meetings and represented the City as required.
- Assisted with, planning, budgeting, and administration of the city-wide Capital Improvement Program, Public Works operating budget, and associated projects.

- Responded to, and resolved, difficult inquiries and complaints from the property owners, contractors, and others regarding Public Works projects and activities.
- Responded to questions and inquiries from a variety of sources regarding department functions.
- Communicated clearly and concisely, both orally and in writing; and established and maintained effective working relationships with those contacted in the course of work.

Orange County Public Works, Santa Ana, CA (9/2011 – 12/2016)
Civil Engineer (9/2015-12/2016)
- Planned, laid out, directed, reviewed, and controlled the work of a group of engineering staff.
- Supervised, trained, and evaluated subordinate personnel.
- Supervised the preparation of the temporary traffic control and detour plans for the slurry sealing of all of the collectors and arterial highways within Ladera Ranch.
- Responsible for the Traffic Engineering department's review and approval of the 4.75-mile-long extension of the 241 Toll Road.
- Responsible for the department's review and approval of street improvement plans prepared for arterial and collector streets in new planned communities.
- Initiated the hiring process for Temporary Extra-Help employees: advertised the position, evaluated resumes, interviewed potential candidates, and selected candidates.

Acting Senior Civil Engineer (5/2015-8/2015)
- Managed the Traffic Studies section of the Traffic Engineering Department.
- Planned, laid out, directed, reviewed, and controlled the work of a group of engineering staff to achieve organizational and project objectives in a timely manner.
- Coordinated the work of the Traffic Studies unit to review traffic studies, county property permits, street improvement plans, and signing and striping plans submitted to the Department for review and approval.
- Responsible for the Division's review of tentative tract maps prepared for new planned communities in south Orange County.

Civil Engineer (10/2012-5/2015)
- Prepared plans, specifications, and estimates for traffic-related items for the County's roadway CIP.
- Prepared temporary traffic control plans for construction and permanent signing and striping plans.
- Conducted field inspections of temporary traffic control, signing, and striping.
- Responded to and resolved difficult complaints related to construction projects.
- Made presentations to the general public regarding construction projects.

REGISTRATION:
- Professional Civil Engineer, State of California (License #75996)
- Water & Wastewater Treatment Certificate, Loyola Marymount University
- Building Plans Examiner, International Code Council (Certificate #9703625)

TRAINING:
Geometric Design for California, Institute of Transportation Studies, UC Berkeley
Resident Engineers Academy, Local Technical Assistance Program, Caltrans

SKILLS: MicroStation, AutoCAD, Microsoft Project, SmartSheet, Microsoft Excel, Microsoft Word

Channel Law Group, LLP

March 9, 2026

Justification for CEQA Appeal;
4230 N. Saltillo Street; Case Nos.: ZA-2023-1206-ZAD-DRB-SPP-MSP-HCA; ENV-2023-1207-CE ("Project")

EXHIBIT E

Protected Tree Report & Chapter 49 Landscape Compliance Review by Diana Nicole, M.S.

PROTECTED TREE REPORT &
CHAPTER 49 LANDSCAPE COMPLIANCE REVIEW
4230 Saltillo

PREPARED FOR :

JAMIE T. HALL
CHANNEL LAW GROUP, LLP

BY: DIANA NICOLE ZOGRAN, MS
November 28, 2025

OVERVIEW :

The Project site is within a Very High Fire Hazard Severity Zone (VHFHSZ), which establishes defensible space, vegetation clearance and landscaping requirements. As such, it is subject to vegetation management regulations under L.A.M.C. 57.4906.5.2 and Chapter 49 of the California Fire Code, which was adopted in 2023 by the Los Angeles Department of Building and Safety (LADBS) for new construction within Wildland-Urban Interface areas. Chapter 49 includes the development of minimum requirements for defensible space and landscape plans and long-term vegetation management to reduce the hazards of fire in the VHFHSZ.

SCOPE OF WORK:

The applicant has requested the removal of two protected Coast live oak trees (Quercus agrifolia) with a mitigation planting scheme of four 15 gallon or 24 inch box sized Quercus agrifolia trees I have reviewed the tree removal and landscape plans, and conclude that City cannot lawfully rely on the submitted materials to support compliance with the City's Protected Tree Ordinance, Chapter 49 or CEQA findings of "no impact" or "less than significant impact."

These regulations require strict adherence to spacing, height, clearance from structures, and fuel load reductions, all designed to minimize fire risk. These requirements apply to both new construction and associated landscaping, including mitigation plantings.

OBSERVATIONS AND COMMENTS:

This memorandum identifies deficiencies in the 4230 Saltillo Street project record relevant to CEQA compliance, including the absence of measurable, scaled plan sheets, reliance on an outdated tree report or biological baseline, and failure to demonstrate conformance with the City's Protected Tree Ordinance and Chapter 49 (Wildland-Urban Interface Fire Areas) of the California Fire Code.

I. THE RECORD RELIES ON UNSCALED, "REDUCED" TREE SURVEY MAPS THAT ARE NOT MEASURABLE

A. Appendix A.1 and A.2 are explicitly labeled "reduced"

The project's Protected Tree Report includes **Appendix A.1** ("Tree Location – Survey Map, Reduced") and **Appendix A.2** ("Tree Replacement Map, Site Plan Reduced"). These sheets:

- contain no graphic scale bar,
- contain no printed numeric scale,
- contain no dimension strings, and
- have been reduced from their original sheet size.

Because the reduction ratio is unknown, these diagrams cannot be measured or scaled.

B. Reduced diagrams cannot constitute substantial evidence

CEQA Guidelines §15384 requires information that can be independently verified.

Because plan sheets are reduced and lack any physical or digital measurement reference:

- Tree-to-structure distances cannot be calculated.
- Dripline radii cannot be confirmed.
- Root-zone encroachment cannot be evaluated.
- Spacing between mitigation oaks cannot be checked.
- No defensible-space clearance distances can be confirmed.

C. Cannot rely on reduced, unscaled diagrams to determine "no impact"

The absence of measurable plans forecloses any meaningful review of impacts to:

- Protected trees
- Biological resources
- Grading within driplines
- Wildfire hazard and defensible space
- Landscaping conflicts with Chapter 49

II. THE PROTECTED TREE REPORT IS OUTDATED (2022) AND CANNOT SERVE AS THE CEQA BASELINE

A. CEQA baseline must reflect existing environmental conditions (Guidelines §15125(a))

The Protected Tree Report is dated **September 2022**. The environmental baseline for CEQA purposes must reflect existing conditions at the time of environmental review.

B. Coast live oak canopies expand annually; a 2022 report understates current canopy and root protection zones

Typical canopy expansion in Quercus agrifolia is **6–18 inches per year**. Because the project is now under review in 2025:

- Dripline radii are significantly larger than shown in the 2022 report.
- Tree Protection Zones (TPZs) are mislocated.
- Construction encroachment risks are higher than depicted.
- Root zones may extend further into grading and retaining wall areas.

An outdated tree report cannot be treated as substantial evidence, and any finding relying on it is legally deficient.

III. THE LANDSCAPE PLAN DOES NOT DEMONSTRATE COMPLIANCE WITH CHAPTER 49 (WUI FIRE AREAS)

Chapter 49 mandates documentation showing:

- 0–5 ft noncombustible Zone 0
- 5–30 ft reduced-fuel Zone 1
- Crown separation between tree canopies
- 10 ft minimum clearance between tree crowns and structures, at maturity
- Vertical separation between shrubs and tree canopies (ladder-fuel avoidance)
- Mature canopy representation for all proposed trees

A. The project's planting plan contains none of the required elements

The "Updated Plans 4230 Saltillo 62.pdf" sheet provides:

- no spacing distances,
- no vegetation-to-structure measurements,
- no mature tree canopy diagrams,
- no depiction of Zones 0, 1, or 2,
- no tree-to-tree crown separation,
- shrubs planted directly under oak canopies,
- vegetation shown adjacent to structures, flammable decks, and retaining walls.

B. Without dimensioned spacing, Chapter 49 compliance cannot be verified

Any conclusion that the project complies with Chapter 49 would be:

- unsupported,
- conclusory,
- contrary to the record, and
- invalid under CEQA's substantial evidence standard.

IV. CONCLUSION

A finding of "no impact" or "less than significant impact" cannot be relied on or supported by on the submitted materials.

The record lacks:

- measurable plan sheets,
- a valid environmental baseline,
- defensible-space documentation, and
- verifiable biological constraints.

For these reasons:

- Further environmental review is required,
- A revised and updated Protected Tree Report must be prepared,
- Full-size, scaled drawings must be provided

Sincerely,

s/Diana Nicole

November 28, 2025

About the Expert. Diana Nicole Zogran is an accredited ecological horticulture professional and tree expert. She is known for advancing a scientific approach to landscape design and land care. The Walt Disney Company has been among her Fortune 100 and Fortune 500 clients. She has provided professional services for the largest residential real estate development and management corporations in the nation, non-profits, and private property owners for over 30 years. Diana graduated with a Master's in Horticulture Science from the University of Florida.

Channel Law Group, LLP

March 9, 2026

Justification for CEQA Appeal;
4230 N. Saltillo Street; Case Nos.: ZA-2023-1206-ZAD-DRB-SPP-MSP-HCA; ENV-2023-1207-CE ("Project")

EXHIBIT F

Verified Petition for Writ of Mandate and Complaint for Declaratory and Injunctive Relief (*Federation of Hillside and Canyon Associations, Inc. v. City of Los Angeles*, Case No. 25STCP04981)

Electronically FILED by
Superior Court of California,
County of Los Angeles
12/23/2025 7:13 PM
David W. Slayton,
Executive Officer/Clerk of Court,
By S. Ruiz, Deputy Clerk

JAMIE T. HALL (Bar No. 240183)
GREGORY T. WITTMANN (Bar No. 296143)
CHANNEL LAW GROUP, LLP
8383 Wilshire Blvd., Suite 750
Beverly Hills, CA 90211
Telephone: (310) 347-0050
Facsimile: (323) 723-3960
Email: Jamie.Hall@ChannelLawGroup.com

Attorneys for Petitioners,
FEDERATION OF HILLSIDE AND CANYON ASSOCIATIONS, INC. and
STATE ALLIANCE FOR FIRESAFE ROAD REGULATIONS

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF LOS ANGELES

FEDERATION OF HILLSIDE AND CANYON ASSOCIATIONS, INC., a nonprofit corporation; STATE ALLIANCE FOR FIRESAFE ROAD REGULATIONS, a nonprofit corporation; *Petitioners and Plaintiffs* vs. CITY OF LOS ANGELES, a municipal corporation; and DOES 1-25 *Respondents and Defendants*	Case No. 25STCP04981 **VERIFIED PETITION FOR WRIT OF MANDATE AND COMPLAINT FOR DECLARATORY AND INJUNCTIVE RELIEF**
JOSEPHSON INVESTMENTS, INC., a California corporation; and ROES 1-25 *Real Parties in Interest*	

Channel Law Group, LLP
8383 Wilshire Blvd., Suite 750
Beverly Hills, CA 90211

Petitioners, the Federation of Hillside and Canyon Associations, Inc. ("Hillside Federation") and the State Alliance for Firesafe Road Regulations ("SAFRR") (collectively, "Petitioners"), allege through this Verified Petition for Writ of Mandate and Complaint for Declaratory and Injunctive Relief ("Petition") as follows:

INTRODUCTION

1. The City of Los Angeles is the largest city in the State by both area and population, spanning 469 square miles and encompassing urban centers, suburban neighborhoods, hillside communities and undeveloped wilderness. The City encompasses vast areas of hillside woodlands, chaparral-covered mountainsides and dry grasslands that are susceptible to wildfires, endangering the lives and property of nearby Angelenos. The City has long been affected by wildfire, but as climate change has intensified and development has accelerated in the City's wildland-urban interface, it is increasingly vulnerable to devastating wildfire events.

2. The State Fire Marshall has mapped wildfire-prone areas of the State and established three tiers of Fire Hazard Severity Zones based on the likelihood of fire and the expected fire behavior under extreme weather conditions. The highest hazard areas are mapped within the Very High Fire Hazard Severity Zone ("VHFHSZ"). The City of Los Angeles includes the largest area and population within the VHFHSZ of any city in the State.

3. Since 1991, the California Board of Forestry and Fire Prevention ("CAL FIRE") has implemented wildfire regulations for development in areas under CAL FIRE's jurisdiction, known as the State Minimum Fire Safe Regulations ("Fire Safe Regulations"). Following record wildfires across the State in 2017, the Legislature adopted, and the Governor signed, legislation applying the Fire Safe Regulations to development in the VHFHSZ effective July 1, 2021.

4. The Fire Safe Regulations apply to any new development in the VHFHSZ—including building permits, use permits, parcel creation and road construction—and to the access to such development. The Fire Safe Regulations establish minimum road and driveway standards to provide for emergency access and civilian evacuation; minimum setback standards to reduce structure-to-structure ignitions; and procedures for the review and approval of

Channel Law Group, LLP
8383 Wilshire Blvd., Suite 750
Beverly Hills, CA 90211

Exceptions to deviate from these standards, providing flexibility without compromising essential firefighting capabilities or public safety.

5. Although the City is responsible for enforcing the Fire Safe Regulations in the VHFHSZ in its jurisdiction, and has adopted the Fire Safe Regulations by reference in the Los Angeles Fire Code, the City simply does not enforce or implement them.

6. The Department of City Planning, when approving tentative tract or parcel maps or entitlements for development on narrow streets, does not check for compliance with the Fire Safe Regulations. The Bureau of Engineering ("BOE"), when issuing permits to extend or modify roadways, does not check for compliance with the Fire Safe Regulations. The Los Angeles Department of Building and Safety ("LADBS"), when issuing permits for developments, does not check for compliance with the Fire Safe Regulations. The Los Angeles Fire Department ("LAFD"), when conditioning or approving developments, does not check for compliance with the Fire Safe Regulations. The City does not notify CAL FIRE of relevant permit approvals or inform it of Exceptions, obstructing essential oversight by the State agency as intended by statute. Even after the tragic Palisades Fire of January 2025, the City has failed to enforce or implement the Fire Safe Regulations.

7. The City's noncompliance with the Fire Safe Regulations is a matter of grave public concern. Each development approved in the VHFHSZ in violation of the Fire Safe Regulations exacerbates existing risks and creates new risks to life and property through obstruction of emergency access, blocked evacuations and accelerated structure-to-structure ignitions—not just for the owners or residents of the subject properties, but for entire neighborhoods and the first responders responsible for protecting them. When these risks are compounded across hundreds or thousands of developments, future inevitable wildfires in the VHFHSZ will spread more quickly, cause greater property damage and be more likely to entrap first responders or evacuating residents.

8. The Hillside Federation and SAFRR file this Petition to challenge the City's unlawful pattern and practice of failing to enforce the Fire Safe Regulations. Petitioners seek declaratory relief stating that the City's pattern and practice is unlawful and injunctive relief

Channel Law Group, LLP
8383 Wilshire Blvd., Suite 750
Beverly Hills, CA 90211

ordering it to comply with the Fire Safe Regulations prospectively in future approvals of permits, maps and other developments.

9. As an example of such noncompliance, Petitioners challenge the issuance of building permits at 10453 Sandal Lane and the Board of Building and Safety Commissioners' ("Board") denial of the Hillside Federation's appeal of those building permits. Petitioners seek a writ of mandate commanding the City to set aside the Board's denial of the appeal.

PARTIES

10. Petitioner Federation of Hillside and Canyon Associations, Inc. ("Hillside Federation") is a 501(c)(3) non-profit organization that was founded in 1952. The Hillside Federation represents 47 homeowner and resident associations with approximately 250,000 constituents spanning the Santa Monica Mountains. The Hillside Federation's mission is to protect the quality of life of the residents of the Santa Monica Mountains and other hillside areas of Los Angeles and to promote those policies and programs which will best preserve the natural topography and wildlife of the mountains and hillsides for the benefit of all the people of Los Angeles. For decades, the Hillside Federation has promoted those policies, programs and regulations designed to reduce fire risk.

11. Petitioner State Alliance for Firesafe Road Regulations ("SAFRR") is a 501(c)(3) non-profit organization that was founded in 2023. SAFRR's mission is to ensure that new California development fully complies with land use laws, fire codes and road safety standards, including the State's Minimum Fire Safe Regulations, which are designed to save lives by providing for civilian evacuations while ensuring unimpeded access by large firefighting and emergency equipment.

12. Respondent City of Los Angeles ("City") is a charter city incorporated under the laws of the State of California. Petitioners are ignorant of the true names and capacities of additional Respondents sued herein as DOES 1-25, inclusive, and therefore sues these Respondents by such fictitious names. Petitioners will amend this Petition to allege the true names and capacities of fictitiously named Respondents. Petitioners are informed and believe

Channel Law Group, LLP
8383 Wilshire Blvd., Suite 750
Beverly Hills, CA 90211

and thereon allege that each Respondent designated herein as a DOE has some responsibility for the events and happenings alleged in this Petition.

13. Real Party in Interest Josephson Investments, Inc. ("Real Party") is the owner of property at 10453 Sandal Lane. Petitioners are ignorant of the true names and capacities of additional Real Parties sued herein as ROES 1-25, inclusive, and therefore sues these Real Parties by such fictitious names. Petitioners will amend this Petition to allege the true names and capacities of fictitiously named Real Parties in Interest. Petitioners are informed and believe and thereon allege that each Respondent designated herein as a ROE has some responsibility for the events and happenings alleged in this Petition.

JURISDICTION AND VENUE

14. Pursuant to California Code of Civil Procedure sections 526, 1060, 1085 (alternatively section 1094.5), and 1087, this Court has jurisdiction to issue a writ of mandate and grant declaratory and injunctive relief.

15. Venue is proper in this Court because the causes of action alleged in this Petition arose in Los Angeles County.

EXHAUSTION OF REMEDIES

16. As to the First Cause of Action, petitioning for a writ of administrative mandamus regarding the development at 10453 Sandal Lane, the Hillside Federation exhausted all administrative remedies by filing an appeal to the Board, submitting further objections to the Board and petitioning for reconsideration to challenge new evidence introduced at the hearing.

TIMELINESS OF FILING

17. The Hillside Federation timely petitioned for reconsideration of the Board's denial of its appeal of building permits for the development at 10453 Sandal Lane on October 6, 2025. Pursuant to Code of Civil Procedure section 1094.6(b), the Board's decision became final on October 16, 2025, upon issuance of its Final Action Letter denying the Hillside Federation's petition for reconsideration. This Petition is timely filed within 90 days of the Board's denial of reconsideration (October 16, 2025).

Channel Law Group, LLP
8383 Wilshire Blvd., Suite 750
Beverly Hills, CA 90211

Channel Law Group, LLP
8383 Wilshire Blvd., Suite 750
Beverly Hills, CA 90211

BACKGROUND

The City's Hillsides are Increasingly Vulnerable to Catastrophic Wildfires

18. California is the most wildfire-prone state in the nation. As climate change and drought conditions have intensified in recent decades, the size, intensity and destruction of these wildfires have grown rapidly. Increasing development in the wildland-urban interface, combined with inadequate infrastructure, has made these fires deadlier and more destructive than ever. Measured by acreage burned or structures razed, 15 of the 20 most destructive California wildfires since recordkeeping began in 1932 have occurred in the past 13 years, killing 160 people. In 2017, for example, wildfires burned over 1.3 million acres, killed 41 civilians and two firefighters and destroyed or damaged over 10,000 structures. The 2017 Thomas Fire alone burned over 280,000 acres and, at the time, was the largest wildfire in recorded California history. In January 2025, the Palisades and Eaton Fires destroyed entire neighborhoods, forced the evacuation of more than 200,000 people and killed 31 people, becoming the fifth- and ninth-deadliest wildfires in recorded California history.[1]

19. Incident reports for wildfires across the State regularly cite inadequate road infrastructure—including narrow, winding, steep or dead-end roads—as contributing causes in slow emergency response or the deaths of first responders or civilians. Among many examples Statewide, incident reports for 2006 Esperanza Fire, the 2015 Valley Fire and the 2018 Camp Fire fault inadequate roads for contributing to the deaths of residents and firefighters.

20. Within the County of Los Angeles, wildfires present extraordinary threats to increasingly-developed hillsides and adjacent communities. Of the past ten mass evacuation events Statewide, seven have occurred in Los Angeles County, cumulatively requiring the evacuation of 608,200 civilians.[2]

---

[1] Wikipedia, List of California Wildfires (November 22, 2025), https://en.wikipedia.org/wiki/List_of_California_wildfires.

[2] Los Angeles Regional Fire Safe Council, *Mass Evacuations Can Impact Us All* (November 23, 2025), https://www.wildfirela.org/go/.

Channel Law Group, LLP
8383 Wilshire Blvd., Suite 750
Beverly Hills, CA 90211

21. Within the City of Los Angeles, the history of wildfires is marked by frequent, intense fire seasons, each leaving a lasting mark on the City's communities. In the early 20th century, many of the wildfires were smaller in scale, but in recent decades fire seasons have become progressively more severe due to urban encroachment into wildlands, climate change and droughts.

22. When wildfires occur in the City, they often spread with such speed and ferocity that adequate road networks are essential for civilian evacuation and emergency access. For example, the 1959 Laurel Canyon Fire destroyed 36 homes in just 30 minutes despite immediate LAFD responses.[3] The 1961 Bel Air Fire burned 6,090 acres and destroyed 484 homes, with the Fire Department's incident report faulting narrow, winding and dead-end streets for inadequate fire access:

> Many roads rise into the canyons to either terminate in sharply rising draws or twist out onto dead-end ridges. Characteristic of these ridge and canyon areas is the lack of interconnecting crossroads between one canyon or ridge to the next. A common situation is one in which a ridge road is literally a stone's throw from the canyon street below, but can be reached only by an indirect route requiring a ten minute drive under nonemergency conditions. In the Bel Air and Brentwood communities there are many steep, winding, and extremely narrow dead-end streets.[4]

23. In the 1979 Kirkwood Bowl/Laurel Canyon fire, LAFD's incident report states that half an hour after the fire began, firefighters were attempting to access Grand View Drive to contain the fire from the ridgeline, but were "was hampered in their efforts to move into position by the civilian traffic that clogged the narrow streets." Forty minutes after the fire began, members of the same company were unable to access exposed structures on Grand View Drive "due to high voltage power lines falling and blocking streets." The incident report faulted "narrow streets, some practically inaccessible to fire apparatus" for delayed response and the

---

[3] Los Angeles Fire Department Historical Archives, The Laurel Canyon Fire (July 10, 1959), https://www.lafire.com/famous_fires/1959-0710_LaurelCanyonFire/071059_LaurelCanyon.htm.

[4] Los Angeles Fire Department Historical Archives, The Bel Air Brush Fire (November 6, 1961), https://www.lafire.com/famous_fires/1961-1106_BelAirFire/1961-1106_LAFD-Report_BelAirFire.htm.

Channel Law Group, LLP
8383 Wilshire Blvd., Suite 750
Beverly Hills, CA 90211

isolation of firefighters.[5] In a 2017 news interview at the epicenter of this fire, LAFD Deputy Chief Charles Butler explained the extreme danger that narrow, substandard roads continue to pose to public safety. "You've got parking on one side, you've got a trash truck blocking your access… a car that parks on a curve in a bad spot could block a fire truck or an ambulance from getting into this area."[6]

24. The 1993 Old Topanga Fire, located just west of the City, burned 16,516 acres, injured 565 firefighters and destroyed 388 structures. During one half-hour period, the fire burned 75 acres per minute. LAFD's incident report faulted "[n]arrow winding roads with singular access and egress points" for inhibiting fire access and causing firefighters to become entrapped by the fire.[7]

25. The 2018 Woolsey Fire, just west of the City, destroyed more than 1,600 structures, killed three people and forced the evacuation of more than 295,000 people. The County's after-action report noted: "The Malibu coastal plain area also has many long, dead-end canyon roads, which makes evacuation and firefighting access very challenging."[8]

---

[5] Los Angeles Fire Department Historical Archive, The Kirkwood Bowl/Laurel Canyon Fire (September 16, 1979), https://www.lafire.com/famous_fires/1979-0916_KirkwoodBowlFire/ 091679_kirkwood_F225_BC9.htm.

[6] YouTube.com, Firefighters warn of Kirkwood Bowl fire danger by ABC7 (October 27, 2017), https://www.youtube.com/watch?v=AT1742bQ5oE.

[7] Los Angeles Fire Department Historical Archive, Old Topanga Fire (November 11, 1993), https://www.lafire.com/famous_fires/1993-1102_OldTopangaFire/1993-1102_OfficialReport_OldTopangaIncident.htm.

[8] County of Los Angeles, After Action Review of the Woolsey Fire Incident (November 17, 2019), https://file.lacounty.gov/SDSInter/bos/supdocs/144968.pdf.

Channel Law Group, LLP
8383 Wilshire Blvd., Suite 750
Beverly Hills, CA 90211

FIGURE 1: HORSES ON A MALIBU BEACH DURING THE WOOLSEY FIRE[9]



26. The Palisades Fire of 2025 reflects the City's inherent and increasing vulnerability to catastrophic wildfires. Santa Ana winds—hot, strong and extremely dry winds—fanned the flames, blowing fire downhill and spreading embers that sparked spot fires thousands of feet away. The Santa Ana winds on January 7th had gusts up to 100 miles per hour.[10] Just twenty-three minutes after the first sighting of smoke from the Palisades Fire, one Los Angeles Fire Department Captain radioed: "This has the potential for 200-plus acres in the next 20 minutes."

27. Before the City could issue an evacuation order, however, evacuation routes to the Pacific Coast Highway were already obstructed. Firefighters reported "gridlock on Palisades Drive" and "a backup about a mile long" on Bienvenida Lane. One resident who evacuated recalled flames spreading down the hillside towards Palisade Drive, with "embers flying over

---

[9] Jennie Jarvie, '*Built to burn.' L.A. let hillside homes multiply without learning from past mistakes*, LOS ANGELES TIMES, February 9, 2025 at https://www.latimes.com/california/story/2025-02-09/built-to-burn-a-history-of-development-of-los-angeles-hillsides.

[10] Los Angeles Fire Department, Palisades Fire After-Action Review Report (October 8, 2025), https://lafd.org/sites/default/files/pdf_files/Palisades_AARR_10_08_2025_final.pdf.

the cars" as he was stuck in a "massive traffic jam." Traffic backups from evacuating residents blocked firefighters from accessing Pacific Palisades.

28. When the City issued its first evacuation order, traffic was already at a standstill. Emergency planning models estimated a full-scale evacuation of the Pacific Palisades would take over five hours under ideal conditions, assuming free-flowing traffic with roads converted to one-way traffic. On the ground, however, residents and emergency responders encountered chaos, obscured visibility and abandoned vehicles. Firefighters radioed: "All companies at the bottom of the Palisades Drive are unable to come up. Traffic completely blocks all four lanes."

29. One family—parents, children and pets—fled when they received the evacuation order. But their van barely made it a quarter mile before being flanked by fire. As fire encroached on evacuation routes, firefighters received further orders: "They need to evacuate all the cars. Requesting units to respond to a call on Sunset and Palisades to evacuate people in vehicles, vehicles burning. Have them get out of the car and go on foot." Sunset Boulevard was "impassible due to approximately 100 abandoned vehicles in the road." Firefighters ultimately rescued trapped residents by clearing Palisades Drive and Sunset Boulevard with a bulldozer.

30. Images of gridlock on Palisades Drive and the clearance of abandoned vehicles are shown below in **Figure 2**.[11]

[11] Los Angeles Fire Department, *Palisades Fire After-Action Review Report* (October 8, 2025), https://lafd.org/sites/default/files/pdf_files/Palisades_AARR_10_08_2025_final.pdf.

Channel Law Group, LLP
8383 Wilshire Blvd., Suite 750
Beverly Hills, CA 90211

Channel Law Group, LLP
8383 Wilshire Blvd., Suite 750
Beverly Hills, CA 90211

FIGURE 2 GRIDLOCK AND ABANDONED VEHICLES IN PALISADES FIRE





Channel Law Group, LLP
8383 Wilshire Blvd., Suite 750
Beverly Hills, CA 90211

31. The Palisades Fire killed 12 people and completely destroyed much of Pacific Palisades, burning nearly every structure north of Sunset Boulevard to the ground. The Palisades Fire was the third-most destructive fire in recorded California History—a distinction which may last only a few years, given the startling intensification of California wildfires.

32. Beyond obstructions on major evacuation routes, LAFD's After-Action Review Report notes that winding, narrow roads were obstructed by downed power lines, uprooted trees and rocks. The Report also found it "imperative" that the Department "immediately conduct an assessment of the neighborhoods' necessity to establish two evacuation routes for all Very High Fire Hazard Severity Zones (VHFHSZ), thereby determining whether supplementary means of egress are warranted." It has not done so.[12]

33. Even before the Palisades Fire, in response to recurring disasters, both the City of Los Angeles' General Plan Framework and numerous Community Plans with hillside areas acknowledged the need for road infrastructure to mitigate wildfire hazards. For instance, the Northeast Los Angeles Community Plan points out the deficient street network resulting from century-old infrastructure and streets that exist only on paper: "Extensive hillside areas remain unbuilt because they were subdivided at a time when no infrastructure improvements or access was required or provided for …." This was an express reference to streets planned on a subdivision map but never built.

34. However, despite these plans' policies, the City fails to implement the State Minimum Fire Safe Regulations, which establish statewide minimum standards for wildfire prevention, emergency access and evacuation. The City is responsible for enforcing the Fire Safe Regulations, and has incorporated them by reference into the Los Angeles Municipal Code (LAMC § 57.4908.1). The City does not enforce the Fire Safe Regulations when it issues permits or approves new development—even after the devastation of the Palisades Fire.

---

[12] Noah Haggerty, *Months after the Jan. 7 fires, L.A.'s evacuation plans remain untested*, LOS ANGELES TIMES, July 25, 2025 at https://www.latimes.com/environment/story/2025-07-25/l-a-fire-evacuation-plans-remain-untested.

Channel Law Group, LLP
8383 Wilshire Blvd., Suite 750
Beverly Hills, CA 90211

The Fire Safe Regulations Apply in the State's Highest Fire Hazard Designation Including Much of the City's Vulnerable Hillsides and Adjacent Communities

35. In 1987, the Legislature passed and the Governor signed SB 1075 (Rogers), which required CAL FIRE to adopt minimum fire standards applicable to all residential, commercial or industrial construction in State Responsibility Area ("SRA") lands. SB 1075 added Public Resources Code section 4290, which provided in part:

> The board shall adopt regulations implementing minimum fire safety standards related to defensible space which are applicable to state responsibility area lands under the authority of the department. These regulations apply to the perimeters and access to all residential, commercial, and industrial building construction within state responsibility areas approved after January 1, 1991. […] These regulations do not apply where an application for a building permit was filed prior to January 1, 1991, or to parcel or tentative maps or other developments approved prior to January 1, 1991, if the final map for the tentative map is approved within the time prescribed by the local ordinance. The regulations shall include all of the following:
>
> (1) Road standards for fire equipment access.
>
> (2) Standards for signs identifying streets, roads, and buildings.
>
> (3) Minimum private water supply reserves for emergency fire use.
>
> (4) Fuel breaks and greenbelts.

36. In 1991, CAL FIRE adopted Fire Safe Regulations applicable only to SRA lands. These regulations established roadway, setback, fuel reduction, water service and other standards with procedures for Exceptions from these standards. (14 Cal. Code Regs., § 1270 *et. seq.*)[13]

37. In 1993, the Attorney General rendered an opinion (**Exhibit 1**) addressing the following question: "Do the fire safety standards adopted by the Board of Forestry for development on state responsibility area lands apply to the perimeters and access to buildings constructed after January 1, 1991, on parcels created by parcel or tentative maps approved prior to January 1, 1991?" The Attorney General's opinion concluded: "The fire safety standards adopted by the Board of Forestry for development on state responsibility area lands apply to the

[13] Unless otherwise specified, citations are to Title 14 of the California Code of Regulations.

perimeters and access to buildings constructed after January 1, 1991, on parcels created by parcel or tentative maps approved prior to January 1, 1991, to the extent that conditions relating to the perimeters and access to the buildings were not imposed as part of the approval of the parcel or tentative maps."

38. The Attorney General observed that the statute provided for two independent exceptions, one for building permits and another for subdivision maps. Observing that "virtually any application for a building permit will be preceded by a parcel or tentative map approval," the Attorney General found that the exception was intended to apply only to construction and development activity that was already in the "pipeline" by January 1, 1991. On this basis, the Attorney General concluded that "only those perimeter and access conditions which were imposed during the parcel or tentative map approval process would be immune from the effect of the regulations." The Fire Safe Regulations were amended to incorporate the AG's conclusions. (§ 1270.03(b).)

39. In 2017, the State was struck by the most destructive wildfire season in California at the time (immediately surpassed by record wildfire seasons in 2018 and 2020). In response, the Legislature passed and the Governor signed SB 901 (Dodd), which expanded the applicability of the Fire Safe Regulations promulgated under Public Resources Code section 4290 to lands in the Local Responsibility Area ("LRA") VHFHSZ.

40. Since July 1, 2021, California law requires that all development in the VHFHSZ shall be subject to the Fire Safe Regulations. A current copy of the Fire Safe Regulations is attached as **Exhibit 2**.

41. The State Fire Marshall has categorized wildfire-vulnerable areas across the State into three fire hazard zones: Moderate, High and Very High. The VHFHSZ is the highest hazard designation. The hazard zone model considers two elements: the probability of burning and probable fire behavior. The probability of burning incorporates calculations based on fire history over the last 50 years. Expected wildfire behavior is based on the typical fire intensity on a normally severe fire weather day. The model places special emphasis on the spread of

Channel Law Group, LLP
8383 Wilshire Blvd., Suite 750
Beverly Hills, CA 90211

burning embers because they can travel long distances in the wind – often miles - and ignite vegetation, roofs, attics and decks.[14]

42. Nearly the entire City of Los Angeles is located in the LRA as mapped by CAL FIRE. (**Exhibit 3**.)

43. Nearly all of the City's hillside areas and many hillside-adjacent communities are located in the VHFHSZ as mapped by CAL FIRE. (**Exhibit 4**.)

44. Most of the area in the City's VHFHSZ is designated for Low Density Residential land use, zoning for the development of single-family homes. (**Exhibit 5**.)

45. The City's VHFHSZ includes numerous communities in and adjacent to hillsides including portions of Woodland Hills, Tarzana, Pacific Palisades, Encino, Mandeville Canyon, Brentwood, Bel Air, Sherman Oaks, Beverly Crest, Studio City, Hollywood Hills, Laurel Canyon, Griffith Park, Los Feliz, Silver Lake, Echo Park, El Sereno, Mount Washington, Highland Park, Eagle Rock, Montecito Heights, Glassel Park, Shadow Hills, Sunland, Tujunga, Sylmar, Porter Ranch, Chatsworth and West Hills.

The Fire Safe Regulations are Essential to Ensure That Development in the VHFHSZ Does Not Endanger the Lives of First Responders and Civilians

46. The purpose of the Fire Safe Regulations is to establish minimum wildfire protection standards in conjunction with building, construction and development in the SRA or in the VHFHSZ after July 1, 2021. The Fire Safe Regulations are intended to ensure that the future design and construction of structures, subdivisions and developments provide for basic emergency access and egress and wildfire protection measures. (§ 1270.02.)

47. The Fire Safe Regulations apply to the perimeters and access to all residential, commercial and industrial building construction approved after July 1, 2021 in the VHFHSZ; the approval of tentative and parcel maps or other developments; applications for use permits; road construction; and applications for building permits. The Fire Safe Regulations include a

---

14 CAL FIRE, *Frequently Asked Questions About: 2020 Fire Hazard Severity Zones* (November 2019), https://cdnverify.bof.fire.ca.gov/media/ttpi3n3m/full-14-b-vhfhsz-frequently-asked-questions.pdf .

Channel Law Group, LLP
8383 Wilshire Blvd., Suite 750
Beverly Hills, CA 90211

narrowly-construed exemption to the extent that a previously-approved parcel map or tentative map imposed conditions relating to the perimeters and access to buildings. (§ 1270.03.)

48. The City is responsible for enforcement of the Fire Safe Regulations within the VHFHSZ in its jurisdiction. The City must provide CAL FIRE with notice of applications for building permits, tentative parcel maps, tentative maps, use permits and other developments in the VHFHSZ. (§ 1270.04.) The City shall ensure that the applicable sections of the Fire Safe Regulations become a condition of approval of any permit, development approval or map. (§ 1270.04(c).)

49. The Fire Safe Regulations include minimum standards for public and private roads and driveways to provide for unobstructed traffic circulation during a wildfire emergency to ensure safe access for first responders and civilian evacuation concurrently. (§ 1273.00.)

50. The Fire Safe Regulations require that all roads providing access to new development shall be constructed to provide a minimum of two ten-foot traffic lanes providing for two-way traffic flow to support emergency vehicle access and civilian evacuation. (§ 1273.01.) All driveways providing access to new development shall be constructed to provide one ten-foot traffic lane and fourteen feet unobstructed horizontal clearance. (§ 1273.01.) Roads shall be designed and maintained to support an imposed load of firefighting equipment weighing at least 75,000 pounds with an aggregate base. (§ 1273.02.) The maximum permitted grade of any road or driveway is 16 percent, but may be up to 20 percent with approval of an Exception. (§ 1273.03.) No roads shall have a radius of curvature of less than 50 feet. (§ 1273.04.) All driveways and dead-end roads are required to provide a turnaround with a minimum 40-foot turning radius or a hammerhead with a minimum 60-foot length. Driveways exceeding 150 feet in length shall provide a turnout at the midpoint of the driveway with a width of 12 feet and a length of 30 feet. (§§ 1273.05-1273.06.) The Fire Safe Regulations establish maximum lengths for dead-end roads based on the number of parcels permitted per acre by applicable zoning. (§ 1273.08.) All gates shall be two feet wider than the width of the traffic lanes with a minimum unobstructed horizontal width of 14 feet. (§ 1273.09.)

Channel Law Group, LLP
8383 Wilshire Blvd., Suite 750
Beverly Hills, CA 90211

Channel Law Group, LLP
8383 Wilshire Blvd., Suite 750
Beverly Hills, CA 90211

51. The Fire Safe Regulations establish building siting and setback standards and fuel modification standards to reduce the intensity of a wildfire. (§ 1276.00.) The Fire Safe Regulations establish a default 30-foot setback from all buildings to any property line and/or the center of any road. This 30-foot setback standard may be reduced where the applicant provides an alternative method to reduce structure-to-structure ignition hazards by incorporating alternative mitigation measures. (§ 1276.01.)

52. The Fire Safe Regulations require the City to identify Strategic Ridgelines, defined as "a Ridgeline identified pursuant to 1276.02(a) that may support fire suppression activities or where the preservation of the Ridgeline as an Undeveloped Ridgeline would reduce fire risk and improve fire protection." The Regulations prohibit or limit development on Strategic Ridgelines. (§ 1276.02.)

53. The Fire Safe Regulations provide discretion for the City to consider and approve requests for Exceptions from the strict application of its minimum standards. The City may waive strict compliance after finding that the Exception provides for the "Same Practical Effect" as the standard in providing for firefighter safety, emergency access, civilian egress, water accessibility and fuel reduction. (§§ 1270.01(aa), 1270.07.)

54. However, the Fire Safe Regulations establish procedures to ensure that Exceptions do not jeopardize public safety. The Fire Safe Regulations are *life safety regulations* intended to protect the lives and property of first responders and civilians. Exceptions from the Fire Safe Regulations require measures to provide *equivalent protection of public safety*—protection which can be achieved in a variety of ways through improved on-site or off-site design, construction or alternative compliance.

55. Exceptions may be granted only on a case-by-case basis, upon written request by an applicant. An application for an Exception shall state the specific section from which an Exception is requested, the material facts supporting the request, the details of the Exception and a map showing the proposed location of the development. The City may only approve an Exception where the applicant, in writing, identifies alternative measures providing the Same Practical Effect as the standard in providing for firefighter safety, emergency access, civilian

egress, water accessibility and fuel reduction. In considering and granting Exceptions, the City must comply with the procedures of the Fire Safe Regulations. (§§ 1270.01(aa), 1270.05, 1270.07.)

56. Recognizing the importance of applying the Fire Safe Regulations to the approval of tentative or parcel maps, the Government Code and LAMC require that the City shall make findings regarding compliance with the Fire Safe Regulations and the availability of structural fire protection and suppression services, and to transmit the accompanying map and findings to CAL FIRE. (Gov. Code § 66474,02; LAMC § 4908.2.)

The Sandal Lane Project and Appeal

57. One example of the City's failure to apply the Fire Safe Regulations is a development at 10453 Sandal Lane in the Bel Air-Beverly Crest neighborhood.

58. On April 22, 2025, LADBS issued Permits 23010-30000-05180, 23030-30000-07897, 23020-30000-02493 and 23047-30000-01957 ("Sandal Lane Permits") for the construction of a new 3,036 square-foot single-family dwelling, retaining walls and swimming pool with associated grading on a vacant 5,469 square-foot lot at 10453 Sandal Lane ("Sandal Lane Project").

59. The subject lot was created in a 1911 subdivision drawn up before the advent of modern subdivision and zoning laws, and just three years after production began for the Ford Model T. The map envisioned a network of interconnected streets providing continuous access to both Beverly Glen Boulevard and Bel Air Road.

60. However, there is a vast discrepancy between the network of continuous, interconnected streets contemplated in 1911 and the handful of discontinuous, dead-end roads in existence today. **Figure 3**, below, shows planned streets (unshaded in the background), existing, paved roads (shaded red) and the parcel at 10453 Sandal Lane (shaded gold) on a BOE map. The Sandal Lane development is located on a street which was intended to have a direct connection to Beverly Glen Boulevard (on the right), but which is in fact located near the terminus of a dead-end street.

Channel Law Group, LLP
8383 Wilshire Blvd., Suite 750
Beverly Hills, CA 90211

Channel Law Group, LLP
8383 Wilshire Blvd., Suite 750
Beverly Hills, CA 90211

FIGURE 3: Bureau of Engineering Map of Sandal Lane Site



(Source: Bureau of Engineering *NavigateLA* portal (NavigateLA.lacity.org))

61. Sandal Lane terminates at its 'intersection' with Crater Lane in an exceptionally narrow dead-end blocked by bollards and an "END" sign, as shown in **Figure 4**.

Channel Law Group, LLP
8383 Wilshire Blvd., Suite 750
Beverly Hills, CA 90211

FIGURE 4: Dead-End at Sandal Lane/Crater Lane



(Source: Hillside Federation Building Permit Appeal)

62. On May 7, 2025, the Hillside Federation submitted to LADBS an appeal of the issuance of the Sandal Lane Permits. The appeal alleged that LADBS erred and abused its discretion in issuing the Sandal Lane Permits in violation of the Fire Safe Regulations because the Sandal Lane Project was located on a dead-end street more than 800 feet in length with more than 20 percent grade and narrower than 20 feet in length. (§§ 1270.08(a), 1273.03(a), 1273.01(a).)

63. On August 4, 2025, LADBS transmitted an Appeal Report to the Board which stated that LADBS relied on BOE and LAFD for review of the Fire Safe Regulations, and that LADBS "has not been contacted by BOE or LAFD indicating that any of their issued clearances were made in error."

64. At its September 16, 2025 hearing, the Board denied the appeal and found that LADBS did not err or abuse its discretion. At the hearing, the Office Manager of the West Los

Angeles LADBS District Office, Chiharu Suzuki, stated that a Class "B" Permit[15] from BOE would, in the future, be issued to resolve any noncompliance with the LAMC or the Fire Safe Regulations "to the extent feasible."

65. On October 6, 2025, the Hillside Federation timely requested reconsideration of the Board's action. On October 14, 2025, the Board denied the petition for reconsideration and issued a Final Action letter on October 16, 2025.

The City Maintains a Pattern and Practice of Not Enforcing the Fire Safe Regulations For Developments in Its VHFHSZ

66. The City's failure to apply the Fire Safe Regulations to the Sandal Lane Project is just one of countless examples of City approvals in the VHFHSZ from July 1, 2021 to present in violation of the Fire Safe Regulations. The violations in the Sandal Lane Project are not an aberration or isolated oversight, but reflect the City's wide-ranging failure to apply the Fire Safe Regulations to developments in its VHFHSZ.

67. Attached as **Exhibit 6** is a non-exhaustive, illustrative list of permits and developments in the VHFHSZ approved by the City in violation of LAMC section 4908.1 and the Fire Safe Regulations. Rather, the list demonstrates that the City simply does not check for compliance with the Fire Safe Regulations when issuing permits or approving developments in the VHFHSZ. Because the City fails to apply the Fire Safe Regulations as a rule, the scope of violations is expansive and infects a broad range of City actions and approvals. As **Exhibit 6** illustrates, the City has a pattern and practice of failing to apply the Fire Safe Regulations to a broad range of approvals and developments in its VHFHSZ.

68. Numerous City agencies and departments play a role in the issuance of permits and the approval of developments in the City's VHFHSZ including the Department of City Planning; BOE; LADBS and LAFD. When one agency is challenged over its failure to implement and enforce the Fire Safe Regulations, it typically disclaims responsibility and

[15] A Class "B" Permit is required for extensive public works improvements in the public right-of-way including the widening of streets and alleys. (LAMC section 62.111.)

Channel Law Group, LLP
8383 Wilshire Blvd., Suite 750
Beverly Hills, CA 90211

asserts that another City agency or department is responsible. LADBS, for example, has claimed that BOE and LAFD alone are responsible for implementing and enforcing the Fire Safe Regulations, so that the issuance of any building permits in violation of the Fire Safe Regulations is not its own error.

69. The City fails to apply the Fire Safe Regulations to the issuance of building permits for construction not relating to an existing structure on parcels in the VHFHSZ not subject to conditions relating to the perimeters or access imposed by as part of a tentative or parcel map approved prior to January 1, 1991. (§ 1270.03(a)(1), (a)(4), (c)(2).)

70. The City fails to apply the Fire Safe Regulations to the issuance of "B" Permits for the construction, extension or widening of roads in the VHFHSZ. (§ 1270.03(a)(3), (c)(4).)

71. The City fails to apply the Fire Safe Regulations to the approval of Zoning Administrator Determinations or Class 1 Conditional Use Permits[16] pursuant to LAMC section 12.24-X.21(a)(2) for new construction in the VHFHSZ on a lot that does not provide a 20 foot continuous paved roadway to the boundary of the hillside area. (§ 1270.03(a)(1), (c)(3).)

72. The City fails to apply the Fire Safe Regulations to the approval of tentative and parcel maps, including those that result in the creation of new parcels in the VHFHSZ. (§ 1270.03(a)(3), (c)(1).)

73. The City fails to apply the Fire Safe Regulations to the approval of access gates. (§ 1273.09.)[17]

[16] The City adopted Ordinance 187,712 (effective January 1, 2023) reorganizing the administrative processes and procedures for zoning and land use entitlements. Prior to the implementation of Ordinance 187,712, approvals to permit development with less than a 20-foot continuous paved roadway to the boundary of the Hillside Area were referred to as "Zoning Administrator Determinations" with a corresponding -ZAD City Planning Case Suffix. After its implementation, such approvals were categorized as Class 1 Conditional Use Permits with a corresponding -CU1 City Planning Case Suffix. Both the Zoning Administrator Determinations and the Class 1 Conditional Use Permits which permit construction of a dwelling on a parcel with less than a 20-foot continuous paved roadway from the driveway apron to the boundary of the Hillside Area are use permits for purposes of the Fire Safe Regulations.

[17] Access gates located within the public right-of-way may require approval of a Revocable "R" Permit pursuant to LAMC section 62.118.2.

Channel Law Group, LLP
8383 Wilshire Blvd., Suite 750
Beverly Hills, CA 90211

74. The City fails to ensure that applicable sections of the Fire Safe Regulations become a condition of approval of any permit, development or map. (§ 1270.04(c).)

75. The City fails to make required findings of compliance with the Fire Safe Regulations or availability of fire protection and suppression services when approving tentative or parcel maps in the VHFHSZ, or to transmit the required findings to CAL FIRE. (LAMC § 4908.2.)

76. The City fails to comply with the procedures of the Fire Safe Regulations for granting Exceptions, including the requirement to impose mitigation ensuring the Same Practical Effect and to send notice to CAL FIRE. (§ 1270.07(a), (e).)

77. The City fails to provide CAL FIRE with notice of certain development applications as required by the Fire Safe Regulations. (§ 1270.04.)

78. The City has failed to identify Strategic Ridgelines to support fire suppression activities or where the preservation of an undeveloped ridgeline would reduce fire risk and improve fire protection. (§ 1276.02.)

79. The City's failure to apply the Fire Safe Regulations to developments in its VHFHSZ results in violations of the Fire Safe Regulations including, but are not limited to: inadequate road/driveway width; excessive road/driveway grade; inadequate road design strength; inadequate road turning radius; inadequate setbacks; inadequate areas for turnouts/turnarounds; excessive dead-end road length; inadequate road gate width/setback; failure to comply with Exception procedure; and failure to notify CAL FIRE.

80. In issuing permits and approving other developments, the City fails to account for on-street parking that results in a roadway which may exceed 20 feet in width not providing two 10-foot "traffic lanes" as required by the Fire Safe Regulations. (§ 1273.01(a).) The Fire Safe Regulations require that the two 10-foot traffic lanes "shall provide for two-way traffic flow to support emergency vehicle and civilian egress[.]" (§ 1273.01(a).) Many of the City's hillside streets allow parking on one or both sides of the street, and many of these parking lanes are not subject to "Red Flag" limitations prohibiting parking during high fire-risk "Red Flag Alert Days."

Channel Law Group, LLP
8383 Wilshire Blvd., Suite 750
Beverly Hills, CA 90211

81. The failure to account for on-street parking and to restrict on-street parking during Red Flag Alert Days increases hazards on countless City streets in the VHFHSZ. **Exhibit 7** is a portion of the Bureau of Engineer's map of roadway widths available on its NavigateLA web portal showing street widths in a portion of the Hollywood Hills. Streets highlighted in red are confirmed to have roadways less than 20 feet in width; development on these Streets does not comply with the Fire Safe Regulations and would require an Exception. Streets highlighted in blue are confirmed to have roadways between 20 and 28 feet in width; development on these streets would not comply with the Fire Safe Regulations where on-street parking is permitted on one or both sides of the street, depending on roadway width. Streets highlighted in green are confirmed to have roadways more than 28 feet in width; development on these streets might not comply with the Fire Safe Regulations where on-street parking is permitted on both sides of the street, depending on roadway width.

82. **Exhibit 8** provides an example of a roadway width analysis for a development at 4320 Saltillo Street accounting for on-street parking, prepared by a professional civil engineer with extensive experience street plans and public roadway facilities. In this example, a street with a 24-foot roadway and unlimited on-street parking on one side provided just 16 feet in roadway for travel lanes—far too narrow to accommodate simultaneous two-way traffic for emergency vehicles and evacuating civilians.

83. The City's wholesale failure to apply the Fire Safe Regulations to the approvals and developments listed in **Exhibit 6** demonstrates that the City maintains a pattern and practice of not checking for compliance with the Fire Safe Regulations for approvals or developments in its VHFHSZ. Thus, Petitioners are informed and believe, and thereon allege, that the City's violations of the Fire Safe Regulations extend beyond those specific instances identified in this Petition.

The City's Violations are Ongoing and Pervasive Despite Notice

84. On March 21, 2025, the Hillside Federation notified the City of its failure to enforce the Fire Safe Regulations and demanded compliance its road width, driveway width and building setback standards. This letter cited violations at 4230 N. Saltillo Street, 504 W. Avenue

Channel Law Group, LLP
8383 Wilshire Blvd., Suite 750
Beverly Hills, CA 90211

44, 12001 Chalon Road and 10453 Sandal Lane. The Hillside Federation's March 2025 demand letter is attached as **Exhibit 9**.

85. On September 19, 2025, the Hillside Federation sent a second demand letter to the City expanding the scope of alleged violations, cited violations at sixteen sites and set forth a specific course of action to remedy the City's ongoing violations. The Hillside Federation's September 2025 demand letter is attached as **Exhibit 10**.

86. On December 23, 2025, SAFRR joined in the Hillside Federation's objections. SAFRR's e-mail to the City is attached as **Exhibit 11**.

87. The City has taken no action to bring its practices, policies and procedures into compliance with LAMC section 4908.1 and the Fire Safe Regulations despite the Hillside Federation's demands for compliance.

The City's Failure to Enforce the Fire Safe Regulations Exacerbates Hazards and Obstructs First Responder Access and Civilian Evacuation

88. Many of the City's hillside neighborhoods were laid out a century ago, predating the existence of modern zoning and subdivision laws, when the hillsides were sparsely populated, motor vehicles were compact and climate change had yet to accelerate. Their road networks are often narrow, winding and steep, with many roads ending in dead-ends or requiring on-street parking preventing concurrent two-way traffic. Many neighborhoods feature "paper streets"—streets that were intended to be constructed when the subdivision was conceived, but never built. As property values have increased, the City has been inundated with proposals to develop vacant lots or to subdivide existing parcels. This development pressure will only increase in the future.

89. In hillside areas characterized by narrow, steep, dead-end roads, new development in violation of the Fire Safe Regulations makes it more likely that roads would become obstructed, with potentially catastrophic consequences. As demonstrated by the chaos of the Palisades Fire evacuations and incident reports for wildfires in the City and Statewide, road conditions rapidly deteriorate during the extreme conditions giving rise to wildfires. A narrow hillside road serving a small area, while easily capable of handling traffic under normal conditions, may become

Channel Law Group, LLP
8383 Wilshire Blvd., Suite 750
Beverly Hills, CA 90211

bottlenecked or blocked entirely. Smoke reduces visibility. Wind-blown embers spark spot roadside spot fires. Hurricane-force winds blow down trees and power lines. Residents encountering obstructions turn around and find alternate routes to safety. First responders in oversize vehicles travel into evacuation areas to for rescue and wildfire response duties. Under these circumstances, additional development creates new risks—including risks to life and property—above and beyond pre-existing hazards.

90. The risks caused by the City's failure to implement the Fire Safe Regulations are exacerbated by the City's noncompliance with State law (AB 747, Levine) requiring it to analyze the adequacy of evacuation routes in its Public Safety Element.[18]

91. The public safety standards in the Fire Safe Regulations reflect the considered judgment and expertise of wildfire professionals and State officials who have spent their careers fighting wildfires and learning from past disasters. If consistently implemented, the Fire Safe Regulations ensure that new development in the VHFHSZ does not endanger public safety and does not introduce new risks to property and the lives of first responders or civilians.

92. However, as a result of the City's failure to enforce the Fire Safe Regulations, new developments in the VHFHSZ create new public safety risks today and for decades to come. When compounded across hundreds or thousands of developments Citywide, future wildfires in the City—which can be expected to be more intense than ever—will spread more quickly, cause greater property damage and be more likely to entrap first responders or evacuating residents.

[18] Noah Haggerty, *Months after the Jan. 7 fires, L.A.'s evacuation plans remain untested*, LOS ANGELES TIMES, July 25, 2025 at https://www.latimes.com/environment/story/2025-07-25/l-a-fire-evacuation-plans-remain-untested.

Channel Law Group, LLP
8383 Wilshire Blvd., Suite 750
Beverly Hills, CA 90211

Channel Law Group, LLP
8383 Wilshire Blvd., Suite 750
Beverly Hills, CA 90211

FIRST CAUSE OF ACTION

(As to Hillside Federation)

Administrative Mandamus; Violation of Fire Safe Regulations at 10453 Sandal Lane

(CCP § 1094.5)

93. Petitioners re-allege and incorporate by reference the preceding paragraphs of this Petition.

94. The Board erred and abused its discretion in denying the Hillside Federation's appeal of LADBS' issuance of Sandal Lane Permits in violation of the Fire Safe Regulations and LAMC section 4908.1.

95. The Sandal Lane Project is subject to the Fire Safe Regulations because it consists of an "application for a Building permit for new construction not relating to an existing Structure." (§ 1270.03(c)(2).)

96. The Sandal Lane Project does not fall within any exemption from the scope of the Fire Safe Regulations. The Fire Safe Regulations provide an exemption only where a "parcel was formed by a parcel map or tentative map … approved prior to January 1, 1991 to the extent that conditions relating to the perimeters and access to the Buildings were imposed by the parcel map or final tentative map approved prior to January 1, 1991." (§ 1270.03(b).) The Sandal Lane parcel does not fall into this exemption because it was not formed by a parcel or tentative map and was created before modern zoning and subdivision laws allowed jurisdictions to impose conditions relating to the perimeters or access to buildings.

97. The scope of the Fire Safe Regulations encompasses not only work within the perimeters of a parcel, but also to the access to that development—in this case, Sandal Lane. The Fire Safe Regulations expressly apply to the "access to all residential … Building construction … approved after July 1, 2021 in the VHFHSZ ...." (§ 1270.03(a)(1).)

98. In 2019, the Attorney General's office submitted comments on a project in the State Responsibility Area of County of Monterey on a narrow, dead-end existing road:

> The Project does not comply with the state's dead-end road limitations and road width limitations applicable to development within an SRA. (Cal. Code. Regs., tit. 14, §§ 1273.08 and 1273.01; adopted pursuant to Pub. Resources Code§

> 4290.) In response to our July 9, 2019 comments regarding the Project's failure to comply with SRA regulations, the FEIR claims that Paraiso Springs Road is an existing road and thus exempt from such regulations. (FEIR, p. 617 .) […]
>
> [E]xempting the Project from the SRA regulations simply because Paraiso Springs Road is a pre-existing road would undermine the intent of the SRA regulations. SRA regulations are meant to ensure that " [t]he future design and construction of structures, subdivisions and developments in the SRA shall provide for basic emergency access .... " (Cal. Code Regs., tit. 14, § 1270.0l(b).) […] **It is the construction of a new project that triggers the application of the SRA regulations**; the fact that the Project is being constructed at the end of an existing road does not negate the triggering effect of the new construction. A contrary interpretation would incentivize development without adequate evacuation routes and emergency access in the SRA rather than prevent it.

99. Thus, while Sandal Lane may have been exempt from the Fire Safe Regulations *prior to* development of the Sandal Lane Project, new development brings Sandal Lane within the scope of the regulations. The Sandal Lane Project must bring Sandal Lane into compliance with the minimum roadway standards of the Fire Safe Regulations or obtain an Exception to provide for equivalent firefighter safety, emergency access and civilian egress.

100. LADBS is not entitled to rely on erroneous clearances by LAFD or BOE. Pursuant to LAMC section 11.02, any permits issued in violation of any City ordinance are void regardless of whether the error originated in LADBS or the clearances of other departments.

101. Moreover, the City cannot rely on a hypothetical, future "B" Permit to cure violations of the Fire Safe Regulations "to the extent feasible." The Hillside Federation's expert, a licensed Professional Engineer and former employee of the Bureau of Engineering, reviewed the "B" Permit that had been issued by the Bureau of Engineering and verified that it did not resolve the alleged noncompliance regarding grade, dead-end length, width or lack of turnaround. Moreover, the LAMC requires that the scope of a "B" Permit shall be determined prior to building permit issuance. LADBS may not rely on the hypothetical issuance of a "B" Permit, which has not been issued, to claim it did not err or abuse its discretion. Finally, the Fire Safe Regulations do not authorize Exceptions based on *feasibility*, but instead require that Exceptions must provide the Same Practical Effect as the standard in providing for public safety.

Channel Law Group, LLP
8383 Wilshire Blvd., Suite 750
Beverly Hills, CA 90211

102. The Sandal Lane Permits were *void ab initio* pursuant to LAMC section 11.02 which provides in part:

> Notwithstanding any other provisions of this Code or any other ordinance of the City of Los Angeles, no permit or license shall be issued in violation of any provisions of this Code or any other ordinance of the City of Los Angeles; if any permit or license is issued in violation of any provision of this Code or any other ordinance of the City of Los Angeles the same **shall be void**.

103. Therefore, the Sandal Lane Permits were issued in violation of the Fire Safe Regulations and LAMC section 4908.1. The Board's decision that LADBS did not err or abuse its discretion in issuing the Sandal Lane Permits lacks substantial evidence and relies on erroneous interpretations of law. The Board's denial of the Hillside Federation's appeal lacks substantial evidence and relies on erroneous interpretations of law.

SECOND CAUSE OF ACTION

(As to Hillside Federation and SAFRR)

Traditional Mandate; Pattern and Practice of Violations of Fire Safe Regulations

(CCP §§ 526, 1060, 1085)

104. Petitioners re-allege and incorporate by reference the preceding paragraphs of this Petition.

105. The City maintains an unlawful pattern and practice of failing to apply the Fire Safe Regulations to developments in the VHFHSZ and approving developments in violation of the Fire Safe Regulations. The City's ongoing course of action violates LAMC section 4908.1 and the Fire Safe Regulations.

106. There exists a present and ripe controversy between Petitioners and the City related to the various patterns and practices of the City that result in ongoing failures of the City to comply with the State Fire Safe Regulations.

107. Specifically, Petitioners allege that the City maintains a pattern and practice of issuing permits and approving developments in violation of the LAMC and the Fire Safe Regulations by failing to apply minimum road/driveway and setback standards, failing to process Exemptions providing for the Same Practical Effect in protecting public safety, failing to make required findings, and failing to provide required notice to CAL FIRE.

Channel Law Group, LLP
8383 Wilshire Blvd., Suite 750
Beverly Hills, CA 90211

108. Petitioners seek a judicial determination that the City's actions violate LAMC sections 4908.1 and 4908.2 and the Fire Safe Regulations. Such a determination is necessary and proper because the City refuses to conform its policies and procedures to the requirements of the LAMC and the Fire Safe Regulations.

109. Petitioners further seek an injunction ordering the City to comply with the Fire Safe Regulations. Such an injunction is necessary and proper because the City maintains a pattern and practice of approving developments in violation of the LAMC and the Fire Safe Regulations.

THIRD CAUSE OF ACTION

(As to Hillside Federation and SAFRR)

Traditional Mandate; Failure to Identify Strategic Ridgelines

(CCP §§ 526, 1060, 1085)

110. Petitioners re-allege and incorporate by reference the preceding paragraphs of this Petition.

111. The Fire Safe Regulations impose on the City a clear, present and ministerial duty to identify Strategic Ridgelines to reduce fire risk and improve fire protection. (§ 1276.02(a).)

112. Four and one-half years after the Fire Safe Regulations became effective in the City's VHFHSZ, the City has neither identified Strategic Ridgelines nor reviewed the vast hillsides and mountainous terrain and concluded that no Strategic Ridgelines exist.

113. Petitioners seek a judicial determination that the City's failure to identify Strategic Ridgelines violates LAMC sections 4908.1 and the Fire Safe Regulations. Such a determination is necessary and proper because the City refuses to conform its policies and procedures to the requirements of the LAMC and the Fire Safe Regulations.

114. Petitioners further seek an injunction ordering the City to comply with the Fire Safe Regulations and identify any Strategic Ridgelines within the City's VHFHSZ. Such an injunction is necessary and proper because the City maintains a pattern and practice of approving developments in violation of the LAMC and the Fire Safe Regulations.

Channel Law Group, LLP
8383 Wilshire Blvd., Suite 750
Beverly Hills, CA 90211

NOTICE TO ATTORNEY GENERAL

115. On December 23, 2025, Petitioners, through their counsel of record, served the Attorney General with notice of the commencement of this lawsuit, together with a true and correct copy of this Petition. A copy of such notice (without copy of this Petition attached to such notice), is attached to this Petition as **Exhibit 12** and is incorporated herein by this reference. Such notice satisfies Petitioner's duties under California Code of Civil Procedure, section 388.

PRAYER FOR RELIEF

WHEREFORE, Petitioners pray for relief as follows:

1. For alternative and peremptory writs of mandate commanding:

   a. The Board to rescind its denial of the Hillside Federation's appeal and its determination that LADBS did not err or abuse its discretion in the issuance of the Sandal Lane Permits;

   b. LADBS to revoke the Sandal Lane Permits;

2. For a judicial declaration that the City's policies, practices and procedures are in violation of LAMC sections 4908.1 and 4908.2 and the Fire Safe Regulations with respect to the following categories of approvals for developments in the City's VHFHSZ:

   a. The issuance of building permits for new construction not relating to existing structures in the VHFHSZ;

   b. The approval of use permits, including but not limited to Class 1 Conditional Use Permits to permit less than a 20-foot continuous paved roadway to the boundary of the Hillside Area pursuant to LAMC section 12.21-X.21(a)(2);

   c. The issuance of "B" permits for the construction, extension or widening of roads;

   d. The issuance of Revocable "R" permits for the construction of access gates;

Channel Law Group, LLP
8383 Wilshire Blvd., Suite 750
Beverly Hills, CA 90211

e. The approval of parcel or tentative maps creating new parcels without making findings regarding conformance with the Fire Safe Regulations or the availability of structural fire protection and suppression services;

f. The consideration, review and approval of Exceptions;

g. The failure to notify CAL FIRE of applications for building permits, tentative parcel maps, tentative maps and use permits;

h. The failure to notify CAL FIRE or the County of Los Angeles of Exceptions granted from the Fire Safe Regulations;

i. Any other City actions, approvals or determinations subject to, not exempt from and not in compliance with the Fire Safe Regulations;

3. For an injunction commanding the City, including any and all City departments with a role in reviewing or approving developments subject to the Fire Safe Regulations, including but not limited to the Department of City Planning, Bureau of Engineering, Department of Building and Safety and Fire Department:

a. Prohibiting the City from issuing permits or approving developments in violation of the Fire Safe Regulations or LAMC sections 4908.1 and 4908.2;

b. Requiring the City to check for and enforce compliance with the Fire Safe Regulations and LAMC sections 4908.1 and 4908.2;

c. Requiring the City to implement a comprehensive compliance program to ensure ongoing adherence to the Fire Safe Regulations and LAMC sections 4908.1 and 4908.2, including regular reporting to this Court regarding compliance efforts and progress;

4. For a judicial determination that the City's failure to identify Strategic Ridgelines in the City's VHFHSZ violates the Fire Safe Regulations;

5. For an injunction commanding the City to identify Strategic Ridgelines, if any, in the City's VHFHSZ and to apply the Fire Safe Regulations to such Strategic Ridgelines;

Channel Law Group, LLP
8383 Wilshire Blvd., Suite 750
Beverly Hills, CA 90211

6. For the Court to retain jurisdiction over this matter for the purpose of ensuring the City's full and continued compliance with the Fire Safe Regulations and LAMC sections 4908.1 and 4908.2;

7. For costs of the suit;

8. For attorneys' fees pursuant to Code of Civil Procedure section 1021.5; and

9. For such other and further relief as the Court deems just and proper.

Dated: December 23, 2025

By: _____

Jamie T. Hall
CHANNEL LAW GROUP, LLP
Attorneys for Federation of Hillside and Canyon Associations, Inc. and Statewide Alliance for Firesafe Road Regulations

Channel Law Group, LLP
8383 Wilshire Blvd., Suite 750
Beverly Hills, CA 90211

Channel Law Group, LLP
8383 Wilshire Blvd., Suite 750
Beverly Hills, CA 90211

VERIFICATION

I, Charley Mims, am the President of the Federation of Hillside and Canyon Associations and authorized to make this verification on its behalf. I have read the foregoing Verified Petition for Writ of Mandate and Complaint for Declaratory and Injunctive Relief and am familiar with its contents. The matters stated therein are true to my own knowledge and belief, except as stated on information and belief, and to those matters I believe them to be true.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on December 23, 2025 at Los Angeles, California.



Charley Mims

Channel Law Group, LLP
8383 Wilshire Blvd., Suite 750
Beverly Hills, CA 90211

VERIFICATION

I, Marylee Guinon, am the President of the State Alliance for Firesafe Road Regulations and authorized to make this verification on its behalf. I have read the foregoing Verified Petition for Writ of Mandate and Complaint for Declaratory and Injunctive Relief and am familiar with its contents. The matters stated therein are true to my own knowledge and belief, except as stated on information and belief, and to those matters I believe them to be true.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on December 23, 2025 at Sebastopol, California.

Marylee Guinon

Channel Law Group, LLP
8383 Wilshire Blvd., Suite 750
Beverly Hills, CA 90211

EXHIBIT LIST

Exhibit No.	Exhibit
1	March 17, 1993, California Attorney General Opinion
2	California Code of Regulations - Fire Safe Regulations
3	CAL FIRE Map of Local Responsibility Area
4	CAL FIRE Map of Very High Fire Hazard Severity Zones
5	Land Use Designation in City's Very High Fire Hazard Severity Zones
6	List of City Development Approvals in Very High Fire Hazard Severity Zones in Violation of Fire Safe Regulations
7	Map of Street Widths in Hollywood Hills
8	State Minimum Fire Safe Regulations Ingress and Egress Requirements re 4320 Saltillo Street
9	March 21, 2025, Pre-Litigation Demand to Comply with State Minimum Fire Safe Regulations
10	September 19, 2025, Pre-Litigation Demand to Comply with State Minimum Fire Safe Regulations
11	December 23, 2025, Email to City of Los Angeles re SAFRR joining in Hillside Federation's objections
12	December 23, 2025, Notice to Attorney General

Channel Law Group, LLP
8383 Wilshire Blvd., Suite 750
Beverly Hills, CA 90211

EXHIBIT 1

TO BE PUBLISHED THE OFFICIAL REPORTS

OFFICE OF THE ATTORNEY GENERAL
State of California

DANIEL E. LUNGREN
Attorney General

OPINION	:	
	:	No. 92-807
of	:	
	:	
DANIEL E. LUNGREN Attorney General	:	MARCH 17, 1993
	:	
GREGORY L. GONOT Deputy Attorney General	:	
	:	

THE HONORABLE JOHN F. HAHN, COUNTY COUNSEL, COUNTY OF AMADOR, has requested an opinion on the following question:

Do the fire safety standards adopted by the Board of Forestry for development on state responsibility area lands apply to the perimeters and access to buildings constructed after January 1, 1991, on parcels created by parcel or tentative maps approved prior to January 1, 1991?

CONCLUSION

The fire safety standards adopted by the Board of Forestry for development on state responsibility area lands apply to the perimeters and access to buildings constructed after January 1, 1991, on parcels created by parcel or tentative maps approved prior to January 1, 1991, to the extent that conditions relating to the perimeters and access to the buildings were not imposed as part of the approval of the parcel or tentative maps.

WKSP 2.5

ANALYSIS

By legislation enacted in 1987 (Stats. 1987, ch. 955, § 2), the State Board of Forestry ("Board") was directed to adopt minimum fire safety standards for state responsibility area lands[1] under the authority of the Department of Forestry and Fire Protection. Public Resources Code section 4290[2] states:

> "(a) The board shall adopt regulations implementing minimum fire safety standards related to defensible space which are applicable to state responsibility area lands under the authority of the department. These regulations apply to the perimeters and access to all residential, commercial, and industrial building construction within state responsibility areas approved after January 1, 1991. The board may not adopt building standards, as defined in Section 18909 of the Health and Safety Code, under the authority of this section. As an integral part of fire safety standards, the State Fire Marshal has the authority to adopt regulations for roof coverings and openings into the attic areas of buildings specified in Section 13108.5 of the Health and Safety Code. The regulations apply to the placement of mobile homes as defined by National Fire Protection Association standards. *These regulations do not apply where an application for a building permit was filed prior to January 1, 1991, or to parcel or tentative maps or other developments approved prior to January 1, 1991, if the final map for the tentative map is approved within the time prescribed by the local ordinance.* The regulations shall include all of the following:
>
> "(1) Road standards for fire equipment access.
>
> "(2) Standards for signs identifying streets, roads, and buildings.
>
> "(3) Minimum private water supply reserves for emergency fire use.
>
> "(4) Fuel breaks and greenbelts.

---

[1] On state responsibility area lands (see Pub. Resources Code, §§ 4126-4127; Cal. Code Regs., tit. 14, §§ 1220-1220.5), the financial responsibility of preventing and suppressing fires is primarily the responsibility of the state, as opposed to local or federal agencies. (Pub. Resources Code, § 4125.)

[2] All references hereafter to the Public Resources Code prior to footnote 8 are by section number only.

"(b) These regulations do not supersede local regulations which equal or exceed minimum regulations adopted by the state." (Emphasis added.)

As indicated in the statute, the Board's regulations are to help create "defensible space"[3] for the protection of state responsibility areas against wildfires.

Originally the regulations were to be applicable with respect to all building construction approved after July 1, 1989, but by subsequent legislation (Stats. 1989, ch. 60, § 1), the threshold date was changed to January 1, 1991. The regulations (Cal. Code Regs., tit. 14, §§ 1270-1276.03)[4] in fact became operative on May 30, 1991.

A "grandfather clause" in the underlying statute provides that "[t]hese regulations do not apply where an application for a building permit was filed prior to January 1, 1991, or to parcel or tentative maps or other developments approved prior to January 1, 1991, if the final map for the tentative map is approved within the time prescribed by the local ordinance." (§ 4290.) We are asked to determine whether the regulations apply to an application for a building permit filed *after* January 1, 1991, for a dwelling to be built on a parcel lawfully created by a parcel map or tentative map approved *prior* to January 1, 1991.

We begin by noting that the grandfather clause contains two ostensibly independent exceptions to the application of the regulations. One is directed at building permits and the other at subdivision maps.[5] These exceptions were apparently designed by the Legislature to exempt construction and development activity already in the "pipeline" as of January 1, 1991. According to Regulation 1270.01, it is the "*future* design

---

[3] Defensible space is defined as:

"The area within the perimeter of a parcel, development, neighborhood or community where basic wild land fire protection practices and measures are implemented, providing the key point of defense from an approaching wildfire or defense against encroaching wild fires or escaping structure fires. The perimeter as used in this regulation is the area encompassing the parcel or parcels proposed for construction and/or development, excluding the physical structure itself. The area is characterized by the establishment and maintenance of emergency vehicle access, emergency water reserves, street names and building identification, and fuel modification measures." (Cal. Code Regs., tit. 14, § 1271.00.)

[4] All references hereafter to title 14 of the California Code of Regulations are by regulation number only.

[5] A parcel map is filed when creating subdivisions of four or fewer parcels, while a tentative map and final map are filed when creating subdivisions of five or more parcels. (Gov. Code, §§ 66426, 66428.)

and construction of structures, subdivisions and development" (emphasis added) which is to trigger application of the regulations.

Thus, although an application for a building permit is not made until after January 1, 1991, the proposed construction may garner an exemption if the parcel is covered by a parcel or tentative map approved prior to January 1, 1991 (provided that the final map for the tentative map is approved within the time prescribed by the local ordinance).[6] However, this raises the question of the purpose of the building permit exception since virtually any application for a building permit will be preceded by a parcel or tentative map approval for the parcel upon which the construction is proposed, even one which may have been obtained in the distant past.[7] A well-established rule of statutory construction holds that "'[w]henever possible, effect should be given to the statute as a whole, and to its every word and clause, so that no part or provision will be useless or meaningless. . . .'" (*Colombo Construction Co.* v. *Panama Union School Dist.* (1982) 136 Cal.App.3d 868, 876; see *Harris* v. *Capital Growth Investors XIV* (1991) 52 Cal.3d 1149, 1159 ["In analyzing statutory language, we seek to give meaning to every word and phrase in the statute to accomplish a result consistent with the legislative purpose, i.e., the object to be achieved and the evil to be prevented by the legislation"].)

Our task then is to search for an interpretation of section 4290 which is not only consistent with the legislative purpose but also furnishes independent significance to each of the two exceptions. We believe that the answer lies in the different manner in which each exception is phrased. The first is "where an application for a building permit was filed prior to January 1, 1991," and the second is "to parcel or tentative maps or other developments approved prior to January 1, 1991 . . . ." The "where" of the first exception implies a broad exemption encompassing all activity related to the building permit, whereas the "to" of the second exception implies an exemption which is limited to matters contained in the parcel or tentative map approval.

Under this reading of section 4290, only those perimeter and access conditions which were imposed during the parcel or tentative map approval process would be immune from the effect of the regulations. Typically, parcel and tentative map approvals include requirements for the improvement of the parcels within the subdivision.

---

[6] The approval of a final map is a ministerial function once the tentative map has been approved and the conditions that were attached to the tentative map have been fulfilled. (Gov. Code, §§ 66458, 66473, 66474.1; *Santa Monica Pines, Ltd.* v. *Rent Control Board* (1984) 35 Cal.3d 858, 865; *Youngblood* v. *Board of Supervisors* (1978) 22 Cal.3d 644, 653.)

[7] Statutory provisions for tentative maps and final maps first appeared in 1929 (Stats. 1929, ch. 838), while parcel maps were first required in 1971 (Stats. 1971, ch. 1446). (See Cal. Subdivision Map Act Practice (Cont.Ed.Bar 1987) §§ 1.2-1.3, pp. 3-5.)

The Subdivision Map Act (Gov. Code, §§ 66410-66499.37; "Act")[8] establishes general criteria for land development planning in the creation of subdivisions throughout the state. Cities and counties are given authority under the legislation to regulate the design and improvement of divisions of land in their areas through a process of approving subdivision maps required to be filed by each subdivider. (§ 66411; *Santa Monica Pines, Ltd.* v. *Rent Control Board, supra*, 35 Cal.3d 858, 869; *South Central Coast Regional Com.* v. *Charles A. Pratt Construction Co.* (1982) 128 Cal.App.3d 830, 844-845.) A subdivider must obtain approval of the appropriate map before the subdivided parcels are offered for sale, or lease, or are financed. (§§ 66499.30, 66499.31; *Bright* v. *Board of Supervisors* (1977) 66 Cal.App.3d 191, 193-194.)

The Act sets forth procedures by which cities and counties may impose a variety of specific conditions when approving the subdivision maps. Such conditions typically cover streets, public access rights, drainage, public utility easements, and parks, among other improvements. (§§ 66475-66489; see *Associated Home Builders etc., Inc.* v. *City of Walnut Creek* (1971) 4 Cal.3d 633, 639-647; *Ayers* v. *City Council of Los Angeles* (1949) 34 Cal.2d 31, 37-43.)

The Act vests cities and counties with the power to regulate and control the "design and improvement of subdivisions" (§ 66411) independent of the power to impose the specified conditions enumerated above. "Design" is defined as:

> ". . . (1) street alignments, grades and widths; (2) drainage and sanitary facilities and utilities, including alignments and grades thereof; (3) location and size of all required easements and rights-of-way; (4) fire roads and firebreaks; (5) lot size and configuration; (6) traffic access; (7) grading; (8) land to be dedicated for park or recreational purposes; and (9) such other specific physical requirements in the plan and configuration of the entire subdivision as may be necessary to ensure consistency with, or implementation of, the general plan or any applicable specific plan." (§ 66418.)

"Improvement" is defined as:

> ". . . any street work and utilities to be installed, or agreed to be installed, by the subdivider on the land to be used for public or private streets, highways, ways, and easements, as are necessary for the general use of the lot owners in the subdivision and local neighborhood traffic and

[8] All references hereafter to the Business and Professions Code are by section number only.

drainage needs as a condition precedent to the approval and acceptance of the final map thereof.

". . . also . . . any other specific improvements or types of improvements, the installation of which, either by the subdivider, by public agencies, by private utilities, by any other entity approved by the local agency, or by a combination thereof, is necessary to ensure consistency with, or implementation of, the general plan or any applicable specific plan." (§ 66419.)

Accordingly, we believe that when a person applies for a building permit after January 1, 1991, the Board's fire safety regulations would be inapplicable as to any matters approved prior to January 1, 1991, as part of the parcel or tentative map process.[9] By contrast, a person who applied for a building permit prior to January 1, 1991, would not be subject to any of the access or perimeter requirements set forth in the regulations.

In addition to preserving independent significance for the building permit exception, the aforementioned reading of Public Resources Code section 4290 comports with another principle of statutory construction, namely that "'[e]xceptions to the general rule of a statute are to be strictly construed.'" (*Da Vinci Group* v. *San Francisco Residential Rent etc. Bd.* (1992) 5 Cal.App.4th 24, 28; see *Goins* v. *Board of Pension Commissioners* (1979) 96 Cal.App.3d 1005, 1009; see also *Board of Medical Quality Assurance* v. *Andrews* (1989) 211 Cal.App.3d 1346, 1355 [statutes conferring exemptions from regulatory schemes are narrowly construed].) More specifically, we have cited "the general rule that a grandfather clause, being contrary to the general rule expressed in a statute, must be narrowly construed. [Citations.]" (57 Ops.Cal.Atty.Gen. 284, 286 (1974).) A blanket exemption for all construction and development activity related to a parcel covered by an approved tentative or parcel map (provided the final map for the tentative map is approved within the time prescribed by the local ordinance) would violate these principles of statutory construction.

On the other hand, we decline to construe the grandfather clause here so narrowly that *all* of the Board's fire safety regulations become applicable when the owner of a parcel covered by a parcel or tentative map approved prior to January 1, 1991, applies for a permit to build on that parcel after January 1, 1991. To do so would mean that the exception for approved tentative or parcel maps would afford the landowner nothing at the construction and development stage. Again, we are guided by the principle that a statute should be interpreted in such a way that no part or provision will be

[9] Regulation 1270.02, for example, exempts "[r]oads required as a condition of tentative [or] parcel maps prior to the effective date of these regulations . . . ."

rendered useless or meaningless. (*Colombo Construction Co.* v. *Panama Union School District*, *supra*, 136 Cal.App. 868, 876.)

Finally, we observe the rule that if more than one construction of a statute appears possible, we must adopt the one that leads to the most reasonable result. (*Industrial Indemnity Co.* v. *City and County of San Francisco* (1990) 218 Cal.App.3d 999, 1008.) An exemption from the regulations for those access and perimeter conditions which are included in the approval of a parcel or tentative map prior to January 1, 1991, serves to lock in reasonable entitlements while ensuring that other fire safety standards may be applied at the time a building permit is sought subsequent to January 1, 1991.

On the basis of the foregoing analysis and principles of statutory construction, we conclude that the fire safety standards adopted by the Board for development on state responsibility area lands apply to the perimeters and access to buildings constructed after January 1, 1991, on parcels created by parcel or tentative maps approved prior to January 1, 1991, to the extent that conditions relating to the perimeters and access to the buildings were not imposed as part of the approval of the parcel or tentative maps.

* * * * *

Channel Law Group, LLP
8383 Wilshire Blvd., Suite 750
Beverly Hills, CA 90211

EXHIBIT 2

14 CCR 1270

This document is current through Register 2025, No. 32, August 8, 2025

§ 1270 Title. [Renumbered]

Statutory Authority

AUTHORITY:

NOTE: Authority cited: Section 4290, Public Resources Code. Reference: Sections 4102, 4126, 4127 and 4290, Public Resources Code.

History

HISTORY

1. New subchapter 2 (sections 1270-1276.03, not consecutive) filed 5-30-91; operative 5-30-91 pursuant to Government Code section 11346.2(d) (Register 91, No. 27).

2. Amendment filed 1-31-2013; operative 4-1-2013 (Register 2013, No. 5).

3. Renumbering of former section 1270to new section 1270.00filed 9-6-2019; operative 1-1-2020 (Register 2019, No. 36).

4. Change without regulatory effect amending subchapter heading filed 2-1-2021 pursuant to section 100, title 1, California Code of Regulations (Register 2021, No. 6).

BARCLAYS OFFICIAL CALIFORNIA CODE OF REGULATIONS
Copyright © 2025 by Barclays Law Publishers All rights reserved

End of Document

14 CCR 1270.00

This document is current through Register 2025, No. 32, August 8, 2025

CA - Barclays Official

§ 1270.00. Title

Subchapter 2 shall be known as the "State Minimum Fire Safe Regulations," and shall constitute the minimum Wildfire protection standards of the California Board of Forestry and Fire Protection.

Statutory Authority

AUTHORITY:

NOTE : Authority cited: Section 4290, Public Resources Code. Reference: Sections 4102, 4126, 4127 and 4290, Public Resources Code.

History

HISTORY

1. Renumbering and amendment of former section 1270to new section 1270.00filed 9-6-2019; operative 1-1-2020 (Register 2019, No. 36).

2. Change without regulatory effect amending section filed 2-1-2021 pursuant to section 100, title 1, California Code of Regulations (Register 2021, No. 6).

3. Amendment of subchapter heading and section filed 1-31-2023; operative 4-1-2023 (Register 2023, No. 5). Transmission deadline specified in Government Code section 11346.4(b) extended 60 calendar days pursuant to Executive Order N-40-20 and an additional 60 calendar days pursuant to Executive Order N-71-20. Filing deadline specified in Government Code section 11349.3(a) extended 60 calendar days pursuant to Executive Order N-40-20 and an additional 60 calendar days pursuant to Executive Order N-71-20.

BARCLAYS OFFICIAL CALIFORNIA CODE OF REGULATIONS
Copyright © 2025 by Barclays Law Publishers All rights reserved

End of Document

14 CCR 1270.01

This document is current through Register 2025, No. 32, August 8, 2025

CA - Barclays Official

§ 1270.01. Definitions

The following definitions are applicable to Subchapter 2.

(a) Agriculture: Land used for agricultural purposes as defined in a Local Jurisdiction's zoning ordinances.

(b) Board: California Board of Forestry and Fire Protection.

(c) Building: Any Structure used or intended for supporting or sheltering any use or Occupancy, except those classified as Utility and Miscellaneous Group U.

(d) CAL FIRE: California Department of Forestry and Fire Protection.

(e) Dead-end Road: A Road that has only one point of vehicular ingress/egress, including cul-de-sacs and Roads that loop back on themselves

(f) Defensible Space: The area within the perimeter of a parcel, Development, neighborhood or community where basic wildland fire protection practices and measures are implemented, providing the key point of defense from an approaching Wildfire or defense against encroaching Wildfires or escaping Structure fires. The perimeter as used in this regulation is the area encompassing the parcel or parcels proposed for construction and/or Development, excluding the physical Structure itself. The area is characterized by the establishment and maintenance of emergency vehicle access, emergency water reserves, Road names and Building identification, and fuel modification measures.

(g) Development: As defined in section 66418.1 of the California Government Code.

(h) Director: Director of the Department of Forestry and Fire Protection or their designee.

(i) Driveway: A vehicular pathway that serves no more than four (4) Residential Units and any number of non-commercial or non-industrial Utility or Miscellaneous Group U Buildings on each parcel. A Driveway shall not serve commercial or industrial uses at any size or scale.

(j) Exception: An alternative to the specified standard requested by the applicant that may be necessary due to health, safety, environmental conditions, physical site limitations or other limiting conditions, such as recorded historical sites, that provides mitigation of the problem.

(k) Fire Apparatus: A vehicle designed to be used under emergency conditions to transport personnel and equipment or to support emergency response, including but not limited to the suppression of fires.

(*l*) Fire Authority: A fire department, agency, division, district, or other governmental body responsible for regulating and/or enforcing minimum fire safety standards in the Local Jurisdiction.

(m) Fire Hydrant: A valved connection on a water supply or storage system for the purpose of providing water for fire protection and suppression operations.

(n) Fuel Break: A strategically located area where the volume and arrangement of vegetation has been managed to limit fire intensity, fire severity, rate of spread, crown fire potential, and/or ember production.

(o) Greenbelts: open space, parks, wildlands, other areas, or a combination thereof, as designated by Local Jurisdictions, which are in, surround, or are adjacent to a city or urbanized area, that may function as Fuel Breaks and where Building construction is restricted or prohibited.

(p) Greenways: Linear open spaces or corridors that link parks and neighborhoods within a community through natural or manmade trails and paths.

(q) Hammerhead/T: A "T" shaped, three-point Turnaround space for Fire Apparatus on a Road or Driveway, being no narrower than the Road or Driveway that serves it.

(r) Hazardous Land Use: A land use that presents a significantly elevated potential for the ignition, prolonged duration, or increased intensity of a Wildfire due to the presence of flammable materials, liquids, or gasses, or other features that initiate or sustain combustion. Such uses are determined by the Local Jurisdiction and may include, but are not limited to, power-generation and distribution facilities; wood processing or storage sites; flammable gas or liquids processing or storage sites; or shooting ranges.

(s) Local Jurisdiction: Any county, city/county agency or department, or any locally authorized district that approves or has the authority to regulate Development.

(t) Municipal-Type Water System: A system having water pipes servicing Fire Hydrants and designed to furnish, over and above domestic consumption, a minimum of 250 gpm (950 L/min) at 20 psi (138 kPa) residual pressure for a two (2) hour duration.

(u) Occupancy: The purpose for which a Building, or part thereof, is used or intended to be used.

(v) One-way Road: A Road that provides a minimum of one Traffic Lane width designed for traffic flow in one direction only.

(w) Residential Unit: Any Building or portion thereof which contains living facilities including provisions for sleeping, eating, cooking and/or sanitation, for one or more persons. Manufactured homes, mobile homes, and factory-built housing are considered Residential Units.

(x) Ridgeline: The line of intersection of two opposing slope aspects running parallel to the long axis of the highest elevation of land; or an area of higher ground separating two adjacent streams or watersheds.

(y) Road: A public or private vehicular pathway to more than four (4) Residential Units, or to any industrial or commercial Occupancy.

(z) Road or Driveway Structures: Bridges, culverts, and other appurtenant Structures which supplement the Traffic Lane or Shoulders.

(aa) Same Practical Effect: As used in this subchapter, means an Exception or alternative with the capability of applying accepted wildland fire suppression strategies and tactics, and provisions for fire fighter safety, including:

(1) access for emergency wildland fire equipment,

(2) safe civilian evacuation,

(3) signing that avoids delays in emergency equipment response,

(4) available and accessible water to effectively attack Wildfire or defend a Structure from Wildfire, and

(5) fuel modification sufficient for civilian and fire fighter safety.

(bb) Shoulder: A vehicular pathway adjacent to the Traffic Lane.

(cc) State Responsibility Area (SRA): As defined in Public Resources Code sections 4126-4127; and the California Code of Regulations, title 14, division 1.5, chapter 7, article 1, sections 1220-1220.5.

(dd) Strategic Ridgeline: a Ridgeline identified pursuant to 1276.02(a) that may support fire suppression activities or where the preservation of the Ridgeline as an Undeveloped Ridgeline would reduce fire risk and improve fire protection.

(ee) Structure: That which is built or constructed or any piece of work artificially built up or composed of parts joined together in some definite manner.

(ff) Traffic Lane: The portion of a Road or Driveway that provides a single line of vehicle travel.

(gg) Turnaround: An area which allows for a safe opposite change of direction for Fire Apparatus at the end of a Road or Driveway.

(hh) Turnout: A widening in a Road or Driveway to allow vehicles to pass.

(ii) Undeveloped Ridgeline: A Ridgeline with no Buildings.

(jj) Utility and Miscellaneous Group U: A Structure of an accessory character or a miscellaneous Structure not classified in any specific Occupancy permitted, constructed, equipped, and maintained to conform to the requirements of Title 24, California Building Standards Code.

(kk) Vertical Clearance: The minimum specified height of a bridge, overhead projection, or vegetation clearance above the Road or Driveway.

(*ll*) Vertical Curve: A curve at a high or low point of a Road that provides a gradual transition between two Road grades or slopes.

(mm) Very High Fire Hazard Severity Zone (VHFHSZ): As defined in Government Code section 51177(i).

(nn) Wildfire: Has the same meaning as "forest fire" in Public Resources Code Section 4103.

Statutory Authority

AUTHORITY:

NOTE: Authority cited: Section 4290, Public Resources Code. Reference: Sections 4290 and 4291, Public Resources Code.

History

HISTORY

1. New section filed 5-30-91; operative 5-30-91 pursuant to Government Code section 11346.2(d) (Register 91, No. 27).

2. Amendment filed 9-6-2019; operative 1-1-2020 (Register 2019, No. 36).

3. Change without regulatory effect amending subsections (a) and (b) filed 2-1-2021 pursuant to section 100, title 1, California Code of Regulations (Register 2021, No. 6).

4. Repealer and new section filed 1-31-2023; operative 4-1-2023 (Register 2023, No. 5). Transmission deadline specified in Government Code section 11346.4(b) extended 60 calendar days pursuant to Executive Order N-40-20 and an additional 60 calendar days pursuant to Executive Order N-71-20. Filing deadline specified in Government

Code section 11349.3(a) extended 60 calendar days pursuant to Executive Order N-40-20 and an additional 60 calendar days pursuant to Executive Order N-71-20.

BARCLAYS OFFICIAL CALIFORNIA CODE OF REGULATIONS
Copyright © 2025 by Barclays Law Publishers All rights reserved

End of Document

14 CCR 1270.02

This document is current through Register 2025, No. 32, August 8, 2025

CA - Barclays Official

§ 1270.02. Purpose

(a) Subchapter 2 has been prepared and adopted for the purpose of establishing state minimum Wildfire protection standards in conjunction with Building, construction, and Development in the State Responsibility Area (SRA) and, after July 1, 2021, the Very High Fire Hazard Severity Zones, as defined in Government Code 51177(i) (VHFHSZ).

(b) The future design and construction of Structures, subdivisions and Developments in the SRA and, after July 1, 2021, the VHFHSZ shall provide for basic emergency access and perimeter Wildfire protection measures as specified in the following articles.

(c) These standards shall provide for emergency access; signing and Building numbering; private water supply reserves for emergency fire use; vegetation modification, Fuel Breaks, Greenbelts, and measures to preserve Undeveloped Ridgelines. Subchapter 2 specifies the minimums for such measures.

Statutory Authority

AUTHORITY:

NOTE : Authority cited: Section 4290, Public Resources Code. Reference: Sections 4290 and 4291, Public Resources Code.

History

HISTORY

1. New section filed 5-30-91; operative 5-30-91 pursuant to Government Code section 11346.2(d) (Register 91, No. 27).

2. Amendment filed 1-31-2013; operative 4-1-2013 (Register 2013, No. 5).

3. Amendment filed 9-6-2019; operative 1-1-2020 (Register 2019, No. 36).

4. Amendment filed 7-27-2020 as an emergency; operative 7-27-2020 (Register 2020, No. 31). A Certificate of Compliance must be transmitted to OAL by 1-25-2021 or emergency language will be repealed by operation of law on the following day.

5. Emergency filed 7-27-2020 extended an additional 60 days (Executive Order N-40-20). A Certificate of Compliance must be transmitted to OAL by 3-26-2021 or emergency language will be repealed by operation of law on the following day.

6. Emergency filed 7-27-2020 extended an additional 60 days pursuant to Executive Order N-66-20 (Register 2020, No. 38). A Certificate of Compliance must be transmitted to OAL by 5-25-2021 or emergency language will be repealed by operation of law on the following day.

7. Change without regulatory effect amending subsection (a)(1) filed 2-1-2021 pursuant to section 100, title 1, California Code of Regulations (Register 2021, No. 6).

8. Amendment refiled 5-10-2021 as an emergency; operative 5-10-2021 (Register 2021, No. 20). Emergency expiration extended 60 days (Executive Order N-40-20) plus an additional 60 days (Executive Order N-71-20). A Certificate of Compliance must be transmitted to OAL by 12-7-2021 or emergency language will be repealed by operation of law on the following day.

9. Amendment refiled 12-6-2021 as an emergency; operative 12-6-2021 (Register 2021, No. 50). A Certificate of Compliance must be transmitted to OAL by 3-7-2022 or emergency language will be repealed by operation of law on the following day.

10. Reinstatement of section as it existed prior to 7-27-2020 amendment by operation of Government Code section 11346.1(f) (Register 2022, No. 15).

11. Editorial correction reinstating language in subsection (a)(1) from 2-1-2021 nonsubstantive action (Register 2022, No. 18).

12. Repealer and new section filed 1-31-2023; operative 4-1-2023 (Register 2023, No. 5). Transmission deadline specified in Government Code section 11346.4(b) extended 60 calendar days pursuant to Executive Order N-40-20 and an additional 60 calendar days pursuant to Executive Order N-71-20. Filing deadline specified in Government Code section 11349.3(a) extended 60 calendar days pursuant to Executive Order N-40-20 and an additional 60 calendar days pursuant to Executive Order N-71-20.

BARCLAYS OFFICIAL CALIFORNIA CODE OF REGULATIONS
Copyright © 2025 by Barclays Law Publishers All rights reserved

End of Document

14 CCR 1270.03

This document is current through Register 2025, No. 32, August 8, 2025

CA - Barclays Official

§ 1270.03. Scope

(a) Subchapter 2 shall apply to:

(1) the perimeters and access to all residential, commercial, and industrial Building construction within the SRA approved after January 1, 1991, and those approved after July 1, 2021 within the VHFHSZ, except as set forth below in subsection (b).

(2) the siting of newly installed commercial modulars, manufactured homes, mobilehomes, and factory-built housing, as defined in Health and Safety Code sections 18001.8, 18007, 18008, and 19971;

(3) all tentative and parcel maps or other Developments approved after January 1, 1991; and

(4) applications for Building permits on a parcel approved in a pre-1991 parcel or tentative map to the extent that conditions relating to the perimeters and access to the Buildings were not imposed as part of the approval of the parcel or tentative map.

(b) Subchapter 2 does not apply where an application for a Building permit is filed after January 1, 1991 for Building construction on a parcel that was formed from a parcel map or tentative map (if the final map for the tentative map is approved within the time prescribed by the local ordinance) approved prior to January 1, 1991, to the extent that conditions relating to the perimeters and access to the Buildings were imposed by the parcel map or final tentative map approved prior to January 1, 1991.

(c) Affected activities include, but are not limited to:

(1) permitting or approval of new parcels, excluding lot line adjustments as specified in Government Code (GC) section 66412(d);

(2) application for a Building permit for new construction not relating to an existing Structure;

(3) application for a use permit;

(4) Road construction including construction of a Road that does not currently exist, or extension of an existing Road.

(d) The standards in Subchapter 2 applicable to Roads shall not apply to Roads used solely for Agriculture; mining; or the management of timberland or harvesting of forest products.

Statutory Authority

AUTHORITY:

NOTE: Authority cited: Section 4290, Public Resources Code. Reference: Sections 4290 and 4291, Public Resources Code.

History

HISTORY

1. New section filed 5-30-91; operative 5-30-91 pursuant to Government Code section 11346.2(d) (Register 91, No. 27).

2. Amendment of section and NOTE filed 1-31-2013; operative 4-1-2013 (Register 2013, No. 5).

3. Amendment of section heading and section filed 9-6-2019; operative 1-1-2020 (Register 2019, No. 36).

4. Change without regulatory effect amending subsection (a) filed 2-1-2021 pursuant to section 100, title 1, California Code of Regulations (Register 2021, No. 6).

5. Renumbering of former section 1270.03 to section 1270.04 and new section filed 1-31-2023; operative 4-1-2023 (Register 2023, No. 5). Transmission deadline specified in Government Code section 11346.4(b) extended 60 calendar days pursuant to Executive Order N-40-20 and an additional 60 calendar days pursuant to Executive Order N-71-20. Filing deadline specified in Government Code section 11349.3(a) extended 60 calendar days pursuant to Executive Order N-40-20 and an additional 60 calendar days pursuant to Executive Order N-71-20.

BARCLAYS OFFICIAL CALIFORNIA CODE OF REGULATIONS
Copyright © 2025 by Barclays Law Publishers All rights reserved

End of Document

14 CCR 1270.04

This document is current through Register 2025, No. 32, August 8, 2025

CA - Barclays Official

§ 1270.04. Provisions for Application of these Regulations

This Subchapter shall be applied as follows:

(a) the Local Jrisdictions shall provide the Director of the California Department of Forestry and Fire Protection (CAL FIRE) or their designee with notice of applications for Building permits, tentative parcel maps, tentative maps, and installation or use permits for construction or Development within the SRA, or if after July, 1 2021, the VHFHSZ.

(b) the Director or their designee may review and make fire protection recommendations on applicable construction or development permits or maps provided by the Local Jrisdiction.

(c) the Local Jrisdiction shall ensure that the applicable sections of this Subchapter become a condition of approval of any applicable construction or Development permit or map.

Statutory Authority

AUTHORITY:

NOTE : Authority cited: Sections 4111 and 4290, Public Resources Code. Reference: Sections 4117 and 4290, Public Resources Code.

History

HISTORY

1. New section filed 5-30-91; operative 5-30-91 pursuant to Government Code section 11346.2(d) (Register 91, No. 27).

2. Amendment of subsection (b) filed 1-31-2013; operative 4-1-2013 (Register 2013, No. 5).

3. Amendment of section heading, section and NOTE filed 9-6-2019; operative 1-1-2020 (Register 2019, No. 36).

4. Amendment filed 7-27-2020 as an emergency; operative 7-27-2020 (Register 2020, No. 31). A Certificate of Compliance must be transmitted to OAL by 1-25-2021 or emergency language will be repealed by operation of law on the following day.

5. Emergency filed 7-27-2020 extended an additional 60 days (Executive Order N-40-20). A Certificate of Compliance must be transmitted to OAL by 3-26-2021 or emergency language will be repealed by operation of law on the following day.

6. Emergency filed 7-27-2020 extended an additional 60 days pursuant to Executive Order N-66-20 (Register 2020, No. 38). A Certificate of Compliance must be transmitted to OAL by 5-25-2021 or emergency language will be repealed by operation of law on the following day.

7. Amendment refiled 5-10-2021 as an emergency; operative 5-10-2021 (Register 2021, No. 20). Emergency expiration extended 60 days (Executive Order N-40-20) plus an additional 60 days (Executive Order N-71-20). A Certificate of Compliance must be transmitted to OAL by 12-7-2021 or emergency language will be repealed by operation of law on the following day.

8. Amendment refiled 12-6-2021 as an emergency; operative 12-6-2021 (Register 2021, No. 50). A Certificate of Compliance must be transmitted to OAL by 3-7-2022 or emergency language will be repealed by operation of law on the following day.

9. Reinstatement of section as it existed prior to 7-27-2020 amendment by operation of Government Code section 11346.1(f) (Register 2022, No. 15).

10. Renumbering of former section 1270.04 to section 1270.05 and renumbering of former section 1270.03 to section 1270.04, including amendment of section, filed 1-31-2023; operative 4-1-2023 (Register 2023, No. 5). Transmission deadline specified in Government Code section 11346.4(b) extended 60 calendar days pursuant to Executive Order N-40-20 and an additional 60 calendar days pursuant to Executive Order N-71-20. Filing deadline specified in Government Code section 11349.3(a) extended 60 calendar days pursuant to Executive Order N-40-20 and an additional 60 calendar days pursuant to Executive Order N-71-20.

BARCLAYS OFFICIAL CALIFORNIA CODE OF REGULATIONS
Copyright © 2025 by Barclays Law Publishers All rights reserved

End of Document

14 CCR 1270.05

This document is current through Register 2025, No. 32, August 8, 2025

CA - Barclays Official

§ 1270.05. Local Regulations

(a) Subchapter 2 shall serve as the minimum Wildfire protection standards applied in SRA and VHFHSZ. However, Subchapter 2 does not supersede local regulations which equal or exceed the standards of this Subchapter.

(b) A local regulation equals or exceeds a minimum standard of this Subchapter only if, at a minimum, the local regulation also fully complies with the corresponding minimum standard in this Subchapter.

(c) A Local Jurisdiction shall not apply exemptions to Subchapter 2 that are not enumerated in Subchapter 2. Exceptions requested and approved in conformance with 1270.07 (Exceptions to Standards) may be granted on a case-by-case basis.

(d) Notwithstanding a local regulation that equals or exceeds the State Minimum Fire Safe Regulations, Building construction shall comply with the State Minimum Fire Safe Regulations.

Statutory Authority

AUTHORITY:

NOTE : Authority cited: Sections 4111, 4119 and 4290, Public Resources Code. Reference: Section 4290, Public Resources Code.

History

HISTORY

1. New section filed 5-30-91; operative 5-30-91 pursuant to Government Code section 11346.2(d) (Register 91, No. 27).

2. Amendment of subsection (a)(3), new subsections (a)(4) and (b), subsection relettering and amendment of newly designated subsection (c) and NOTE filed 1-31-2013; operative 4-1-2013 (Register 2013, No. 5).

3. Amendment of section heading and section filed 9-6-2019; operative 1-1-2020 (Register 2019, No. 36).

4. Repealer of subsections (b)-(b)(2) and subsection relettering filed 7-27-2020 as an emergency; operative 7-27-2020 (Register 2020, No. 31). A Certificate of Compliance must be transmitted to OAL by 1-25-2021 or emergency language will be repealed by operation of law on the following day.

5. Emergency filed 7-27-2020 extended an additional 60 days (Executive Order N-40-20). A Certificate of Compliance must be transmitted to OAL by 3-26-2021 or emergency language will be repealed by operation of law on the following day.

6. Emergency filed 7-27-2020 extended an additional 60 days pursuant to Executive Order N-66-20 (Register 2020, No. 38). A Certificate of Compliance must be transmitted to OAL by 5-25-2021 or emergency language will be repealed by operation of law on the following day.

7. Repealer of subsections (b)-(b)(2) and subsection relettering refiled 5-10-2021 as an emergency; operative 5-10-2021 (Register 2021, No. 20). Emergency expiration extended 60 days (Executive Order N-40-20) plus an additional 60 days (Executive Order N-71-20). A Certificate of Compliance must be transmitted to OAL by 12-7-2021 or emergency language will be repealed by operation of law on the following day.

8. Repealer of subsections (b)-(b)(2) and subsection relettering refiled 12-6-2021 as an emergency; operative 12-6-2021 (Register 2021, No. 50). A Certificate of Compliance must be transmitted to OAL by 3-7-2022 or emergency language will be repealed by operation of law on the following day.

9. Reinstatement of section as it existed prior to 7-27-2020 amendment by operation of Government Code section 11346.1(f) (Register 2022, No. 15).

10. Renumbering of former section 1270.05 to section 1270.06 and renumbering of former section 1270.04 to section 1270.05, including amendment of section, filed 1-31-2023; operative 4-1-2023 (Register 2023, No. 5). Transmission deadline specified in Government Code section 11346.4(b) extended 60 calendar days pursuant to Executive Order N-40-20 and an additional 60 calendar days pursuant to Executive Order N-71-20. Filing deadline specified in Government Code section 11349.3(a) extended 60 calendar days pursuant to Executive Order N-40-20 and an additional 60 calendar days pursuant to Executive Order N-71-20.

BARCLAYS OFFICIAL CALIFORNIA CODE OF REGULATIONS
Copyright © 2025 by Barclays Law Publishers All rights reserved

End of Document

14 CCR 1270.06

This document is current through Register 2025, No. 32, August 8, 2025

CA - Barclays Official

§ 1270.06. Inspections

Inspections shall conform to the following requirements:

(a) Inspections in the SRA shall be made by:

(1) the Director, or

(2) Local Jurisdictions that have assumed state fire protection responsibility on SRA lands, or

(3) Local Jurisdictions where the inspection duties have been formally delegated by the Director to the Local Jurisdictions, pursuant to subsection (b).

(b) The Director may delegate inspection authority to a Local Jurisdiction subject to all of the following criteria:

(1) The Local Jurisdiction represents that they have appropriate resources to perform the delegated inspection authority.

(2) The Local Jurisdiction acknowledges that CAL FIRE's authority under subsection (d) shall not be waived or restricted.

(3) The Local Jurisdiction consents to the delegation of inspection authority.

(4) The Director may revoke the delegation at any time.

(5) The delegation of inspection authority, and any subsequent revocation of the delegation, shall be documented in writing, and retained on file at the CAL FIRE Unit headquarters that administers SRA fire protection in the area.

(c) Inspections in the VHFHSZ shall be made by the Local Jurisdiction.

(d) Nothing in this section abrogates CAL FIRE's authority to inspect and enforce state forest and fire laws in the SRA even when the inspection duties have been delegated pursuant to this section.

(e) Reports of violations within the SRA shall be provided to the CAL FIRE Unit headquarters that administers SRA fire protection in the Local Jurisdiction.

(f) When inspections are conducted, they shall occur prior to: the issuance of the use permit or certificate of Occupancy; the recordation of the parcel map or final map; the filing of a notice of completion; or the final inspection of any project or Building permit.

Statutory Authority

AUTHORITY:

NOTE: Authority cited: Section 4290, Public Resources Code. Reference: Sections 4290 and 4291, Public Resources Code.

History

HISTORY

1. New section filed 5-30-91; operative 5-30-91 pursuant to Government Code section 11346.2(d) (Register 91, No. 27).

2. Amendment filed 1-31-2013; operative 4-1-2013 (Register 2013, No. 5).

3. Amendment of section heading and section filed 9-6-2019; operative 1-1-2020 (Register 2019, No. 36).

4. Renumbering of former section 1270.06 to section 1270.07 and renumbering of former section 1270.05 to section 1270.06, including amendment of section and NOTE , filed 1-31-2023; operative 4-1-2023 (Register 2023, No. 5). Transmission deadline specified in Government Code section 11346.4(b) extended 60 calendar days pursuant to Executive Order N-40-20 and an additional 60 calendar days pursuant to Executive Order N-71-20. Filing deadline specified in Government Code section 11349.3(a) extended 60 calendar days pursuant to Executive Order N-40-20 and an additional 60 calendar days pursuant to Executive Order N-71-20.

BARCLAYS OFFICIAL CALIFORNIA CODE OF REGULATIONS
Copyright © 2025 by Barclays Law Publishers All rights reserved

End of Document

14 CCR 1270.07

This document is current through Register 2025, No. 32, August 8, 2025

CA - Barclays Official

§ 1270.07. Exceptions to Standards

(a) Upon request by the applicant, an Exception to standards within this Subchapter may be allowed by the Inspection entity in accordance with 14 CCR 1270.06 (Inspections) where the Exceptions provide the Same Practical Effect as these regulations towards providing Defensible Space. Exceptions granted by the Local Jurisdiction listed in 14 CCR 1270.06, shall be made on a case-by-case basis only. Exceptions granted by the Local Jurisdiction listed in 14 CCR 1270.06 shall be forwarded to the appropriate CAL FIRE unit headquarters that administers SRA fire protection in that Local Jurisdiction, or the county in which the Local Jurisdiction is located and shall be retained on file at the Unit Office.

(b) Requests for an Exception shall be made in writing to the Local Jurisdiction listed in 14 CCR 1270.06 by the applicant or the applicant's authorized representative.

At a minimum, the request shall state the specific section(s) for which an Exception is requested; material facts supporting the contention of the applicant; the details of the Exception proposed; and a map showing the proposed location and siting of the Exception. Local Jurisdictions listed in 1270.06 (Inspections) may establish additional procedures or requirements for Exception requests.

(c) Where an Exception is not granted by the inspection entity, the applicant may appeal such denial to the Local Jurisdiction. The Local Jurisdiction may establish or utilize an appeal process consistent with existing local building or planning department appeal processes.

(d) Before the Local Jurisdiction makes a determination on an appeal, the inspector shall be consulted and shall provide to that Local Jurisdiction documentation outlining the effects of the requested Exception on Wildfire protection.

(e) If an appeal is granted, the Local Jurisdiction shall make findings that the decision meets the intent of providing Defensible Space consistent with these regulations. Such findings shall include a statement of reasons for the decision. A written copy of these findings shall be provided to the CAL FIRE Unit headquarters that administers SRA fire protection in that Local Jurisdiction.

Statutory Authority

AUTHORITY:

NOTE : Authority cited: Section 4290, Public Resources Code. Reference: Sections 4290 and 4291, Public Resources Code.

History

HISTORY

1. Renumbering of former section 1270.06 to new section 1270.07, including amendment of section, filed 1-31-2023; operative 4-1-2023 (Register 2023, No. 5). Transmission deadline specified in Government Code section 11346.4(b) extended 60 calendar days pursuant to Executive Order N-40-20 and an additional 60 calendar days pursuant to Executive Order N-71-20. Filing deadline specified in Government Code section 11349.3(a) extended 60 calendar days pursuant to Executive Order N-40-20 and an additional 60 calendar days pursuant to Executive Order N-71-20. For prior history, see Register 2019, No. 36.

BARCLAYS OFFICIAL CALIFORNIA CODE OF REGULATIONS
Copyright © 2025 by Barclays Law Publishers All rights reserved

End of Document

14 CCR 1270.08

This document is current through Register 2025, No. 32, August 8, 2025

CA - Barclays Official

§ 1270.08. Distance Measurements

All specified or referenced distances are measured along the ground, unless otherwise stated.

Statutory Authority

AUTHORITY:

NOTE : Authority cited: Section 4290, Public Resources Code. Reference: Sections 4290 and 4291, Public Resources Code.

History

HISTORY

1. New section filed 1-31-2023; operative 4-1-2023 (Register 2023, No. 5). Transmission deadline specified in Government Code section 11346.4(b) extended 60 calendar days pursuant to Executive Order N-40-20 and an additional 60 calendar days pursuant to Executive Order N-71-20. Filing deadline specified in Government Code section 11349.3(a) extended 60 calendar days pursuant to Executive Order N-40-20 and an additional 60 calendar days pursuant to Executive Order N-71-20. For prior history, see Register 2019, No. 36.

BARCLAYS OFFICIAL CALIFORNIA CODE OF REGULATIONS
Copyright © 2025 by Barclays Law Publishers All rights reserved

End of Document

14 CCR 1270.09

This document is current through Register 2025, No. 32, August 8, 2025

§ 1270.09 Appeals [Repealed]

Statutory Authority

AUTHORITY:

NOTE: Authority cited: Section 4290, Public Resources Code Reference: Sections 4290 and 4291, Public Resources Code.

History

HISTORY

1. New section filed 5-30-91; operative 5-30-91 pursuant to Government Code section 11346.2(d) (Register 91, No. 27).

2. Amendment filed 1-31-2013; operative 4-1-2013 (Register 2013, No. 5).

3. Repealer filed 9-6-2019; operative 1-1-2020 (Register 2019, No. 36).

BARCLAYS OFFICIAL CALIFORNIA CODE OF REGULATIONS
Copyright © 2025 by Barclays Law Publishers All rights reserved

End of Document

14 CCR 1271.00

This document is current through Register 2025, No. 32, August 8, 2025

CA - Barclays Official

§]1271.00 Definitions [Repealed]

Statutory Authority

AUTHORITY:

NOTE : Authority cited: Section 4290, Public Resources Code. Reference: Sections 4290 and 4291, Public Resources Code.

History

HISTORY

1. New section filed 5-30-91; operative 5-30-91 pursuant to Government Code section 11346.2(d) (Register 91, No. 27).

2. Amendment filed 9-6-2019; operative 1-1-2020 (Register 2019, No. 36).

3. Amendment of definition of "Residential unit" filed 7-27-2020 as an emergency; operative 7-27-2020 (Register 2020, No. 31). A Certificate of Compliance must be transmitted to OAL by 1-25-2021 or emergency language will be repealed by operation of law on the following day.

4. Emergency filed 7-27-2020 extended an additional 60 days (Executive Order N-40-20). A Certificate of Compliance must be transmitted to OAL by 3-26-2021 or emergency language will be repealed by operation of law on the following day.

5. Emergency filed 7-27-2020 extended an additional 60 days pursuant to Executive Order N-66-20 (Register 2020, No. 38). A Certificate of Compliance must be transmitted to OAL by 5-25-2021 or emergency language will be repealed by operation of law on the following day.

6. Amendment of definition of "Residential unit" refiled 5-10-2021 as an emergency; operative 5-10-2021 (Register 2021, No. 20). Emergency expiration extended 60 days (Executive Order N-40-20) plus an additional 60 days (Executive Order N-71-20). A Certificate of Compliance must be transmitted to OAL by 12-7-2021 or emergency language will be repealed by operation of law on the following day.

7. Amendment of definition of "Residential unit" refiled 12-6-2021 as an emergency; operative 12-6-2021 (Register 2021, No. 50). A Certificate of Compliance must be transmitted to OAL by 3-7-2022 or emergency language will be repealed by operation of law on the following day.

8. Reinstatement of section as it existed prior to 7-27-2020 amendment by operation of Government Code section 11346.1(f) (Register 2022, No. 15).

9. Repealer filed 1-31-2023; operative 4-1-2023 (Register 2023, No. 5). Transmission deadline specified in Government Code section 11346.4(b) extended 60 calendar days pursuant to Executive Order N-40-20 and an additional 60 calendar days pursuant to Executive Order N-71-20. Filing deadline specified in Government Code section 11349.3(a) extended 60 calendar days pursuant to Executive Order N-40-20 and an additional 60 calendar days pursuant to Executive Order N-71-20.

BARCLAYS OFFICIAL CALIFORNIA CODE OF REGULATIONS
Copyright © 2025 by Barclays Law Publishers All rights reserved

End of Document

14 CCR 1271.05

This document is current through Register 2025, No. 32, August 8, 2025

§ 1271.05 Distance Measurements [Repealed]

Statutory Authority

AUTHORITY:

NOTE: Authority cited: Section 4290, Public Resources Code. Reference: Sections 4290 and 4291, Public Resources Code.

History

HISTORY

1. New section filed 5-30-91; operative 5-30-91 pursuant to Government Code section 11346.2(d) (Register 91, No. 27).

2. Repealer filed 9-6-2019; operative 1-1-2020 (Register 2019, No. 36).

BARCLAYS OFFICIAL CALIFORNIA CODE OF REGULATIONS
Copyright © 2025 by Barclays Law Publishers All rights reserved

End of Document

14 CCR 1272.00

This document is current through Register 2025, No. 32, August 8, 2025

§ 1272.00 Maintenance of Defensible Space Measures [Repealed]

Statutory Authority

AUTHORITY:

NOTE: Authority cited: Section 4290, Public Resources Code. Reference: Sections 4290 and 4291, Public Resources Code.

History

HISTORY

1. New section filed 5-30-91; operative 5-30-91 pursuant to Government Code section 11346.2(d) (Register 91, No. 27).

2. Repealer filed 9-6-2019; operative 1-1-2020 (Register 2019, No. 36).

BARCLAYS OFFICIAL CALIFORNIA CODE OF REGULATIONS
Copyright © 2025 by Barclays Law Publishers All rights reserved

End of Document

14 CCR 1273.00

This document is current through Register 2025, No. 32, August 8, 2025

§ 1273.00. Intent

Roads, and Driveways, whether public or private, unless exempted under 14 CCR 1270.03(d), shall provide for safe access for emergency Wildfire equipment and civilian evacuation concurrently, and shall provide unobstructed traffic circulation during a Wildfire emergency consistent with 14 CCR]1273.00 through 1273.09.

Statutory Authority

AUTHORITY:

NOTE : Authority cited: Section 4290, Public Resources Code. Reference: Sections 4290 and 4291, Public Resources Code.

History

HISTORY

1. New section filed 5-30-91; operative 5-30-91 pursuant to Government Code section 11346.2(d) (Register 91, No. 27).

2. Amendment of article heading filed 4-27-2015; operative 1-1-2016 (Register 2015, No. 18).

3. Amendment filed 9-6-2019; operative 1-1-2020 (Register 2019, No. 36).

4. Amendment of article heading and section filed 1-31-2023; operative 4-1-2023 (Register 2023, No. 5). Transmission deadline specified in Government Code section 11346.4(b) extended 60 calendar days pursuant to Executive Order N-40-20 and an additional 60 calendar days pursuant to Executive Order N-71-20. Filing deadline specified in Government Code section 11349.3(a) extended 60 calendar days pursuant to Executive Order N-40-20 and an additional 60 calendar days pursuant to Executive Order N-71-20.

BARCLAYS OFFICIAL CALIFORNIA CODE OF REGULATIONS
Copyright © 2025 by Barclays Law Publishers All rights reserved

14 CCR 1273.01

This document is current through Register 2025, No. 32, August 8, 2025

CA - Barclays Official

§ 1273.01. Width

(a) All roads shall be constructed to provide a minimum of two ten (10) foot traffic lanes, not including shoulder and striping. These traffic lanes shall provide for two-way traffic flow to support emergency vehicle and civilian egress, unless other standards are provided in this article or additional requirements are mandated by Local Jurisdictions or local subdivision requirements. Vertical clearances shall conform to the requirements in California Vehicle Code section 35250.

(b) All One-way Roads shall be constructed to provide a minimum of one twelve (12) foot traffic lane, not including Shoulders. The Local Jurisdiction may approve One-way Roads.

(1) All one-way roads shall, at both ends, connect to a road with two traffic lanes providing for travel in different directions, and shall provide access to an area currently zoned for no more than ten (10) Residential Units.

(2) In no case shall a One-way Road exceed 2,640 feet in length. A turnout shall be placed and constructed at approximately the midpoint of each One-way Road.

(c) All driveways shall be constructed to provide a minimum of one (1) ten (10) foot traffic lane, fourteen (14) feet unobstructed horizontal clearance, and unobstructed vertical clearance of thirteen feet, six inches (13'v 6").

Statutory Authority

AUTHORITY:

NOTE : Authority cited: Section 4290, Public Resources Code. Reference: Sections 4290 and 4291, Public Resources Code.

History

HISTORY

1. New section filed 5-30-91; operative 5-30-91 pursuant to Government Code section 11346.2(d) (Register 91, No. 27).

2. Amendment filed 4-27-2015; operative 1-1-2016 (Register 2015, No. 18).

3. Amendment of section heading and section filed 9-6-2019; operative 1-1-2020 (Register 2019, No. 36).

4. Amendment filed 1-31-2023; operative 4-1-2023 (Register 2023, No. 5). Transmission deadline specified in Government Code section 11346.4(b) extended 60 calendar days pursuant to Executive Order N-40-20 and an additional 60 calendar days pursuant to Executive Order N-71-20. Filing deadline specified in Government Code section 11349.3(a) extended 60 calendar days pursuant to Executive Order N-40-20 and an additional 60 calendar days pursuant to Executive Order N-71-20.

BARCLAYS OFFICIAL CALIFORNIA CODE OF REGULATIONS
Copyright © 2025 by Barclays Law Publishers All rights reserved

End of Document

14 CCR 1273.02

This document is current through Register 2025, No. 32, August 8, 2025

CA - Barclays Official

§ 1273.02. Road Surface

(a) Roads shall be designed and maintained to support the imposed load of Fire Apparatus weighing at least 75,000 pounds, and provide an aggregate base.

(b) Road and Driveway Structures shall be designed and maintained to support at least 40,000 pounds.

(c) Project proponent shall provide engineering specifications to support design, if requested by the Local Jurisdiction.

Statutory Authority

AUTHORITY:

NOTE : Authority cited: Section 4290, Public Resources Code. Reference: Sections 4290 and 4291, Public Resources Code.

History

HISTORY

1. New section filed 5-30-91; operative 5-30-91 pursuant to Government Code section 11346.2(d) (Register 91, No. 27).

2. Repealer and new section filed 4-27-2015; operative 1-1-2016 (Register 2015, No. 18).

3. Amendment of section heading and section filed 9-6-2019; operative 1-1-2020 (Register 2019, No. 36).

4. Amendment filed 1-31-2023; operative 4-1-2023 (Register 2023, No. 5). Transmission deadline specified in Government Code section 11346.4(b) extended 60 calendar days pursuant to Executive Order N-40-20 and an additional 60 calendar days pursuant to Executive Order N-71-20. Filing deadline specified in Government Code section 11349.3(a) extended 60 calendar days pursuant to Executive Order N-40-20 and an additional 60 calendar days pursuant to Executive Order N-71-20.

BARCLAYS OFFICIAL CALIFORNIA CODE OF REGULATIONS
Copyright © 2025 by Barclays Law Publishers All rights reserved

14 CCR 1273.03

This document is current through Register 2025, No. 32, August 8, 2025

CA - Barclays Official

§ 1273.03. Grades

(a) At no point shall the grade for all Roads and Driveways exceed 16 percent.

(b) The grade may exceed 16%, not to exceed 20%, with approval from the Local Jurisdiction and with mitigations to provide for Same Practical Effect.

Statutory Authority

AUTHORITY:

NOTE : Authority cited: Section 4290, Public Resources Code. Reference: Sections 4290 and 4291, Public Resources Code.

History

HISTORY

1. New section filed 5-30-91; operative 5-30-91 pursuant to Government Code section 11346.2(d) (Register 91, No. 27).

2. Amendment of section heading and section filed 9-6-2019; operative 1-1-2020 (Register 2019, No. 36).

3. Amendment filed 1-31-2023; operative 4-1-2023 (Register 2023, No. 5). Transmission deadline specified in Government Code section 11346.4(b) extended 60 calendar days pursuant to Executive Order N-40-20 and an additional 60 calendar days pursuant to Executive Order N-71-20. Filing deadline specified in Government Code section 11349.3(a) extended 60 calendar days pursuant to Executive Order N-40-20 and an additional 60 calendar days pursuant to Executive Order N-71-20.

BARCLAYS OFFICIAL CALIFORNIA CODE OF REGULATIONS
Copyright © 2025 by Barclays Law Publishers All rights reserved

End of Document

14 CCR 1273.04

This document is current through Register 2025, No. 32, August 8, 2025

CA - Barclays Official

§ 1273.04. Radius

(a) No Road or Road Structure shall have a horizontal inside radius of curvature of less than fifty (50) feet. An additional surface width of four (4) feet shall be added to curves of 50-100 feet radius; two (2) feet to those from 100-200 feet.

(b) The length of vertical curves in Roadways, exclusive of gutters, ditches, and drainage structures designed to hold or divert water, shall be not less than one hundred (100) feet.

Statutory Authority

AUTHORITY:

NOTE : Authority cited: Section 4290, Public Resources Code. Reference: Sections 4290 and 4291, Public Resources Code.

History

HISTORY

1. New section filed 5-30-91; operative 5-30-91 pursuant to Government Code section 11346.2(d) (Register 91, No. 27).

2. Amendment of section heading and section filed 9-6-2019; operative 1-1-2020 (Register 2019, No. 36).

3. Amendment filed 1-31-2023; operative 4-1-2023 (Register 2023, No. 5). Transmission deadline specified in Government Code section 11346.4(b) extended 60 calendar days pursuant to Executive Order N-40-20 and an additional 60 calendar days pursuant to Executive Order N-71-20. Filing deadline specified in Government Code section 11349.3(a) extended 60 calendar days pursuant to Executive Order N-40-20 and an additional 60 calendar days pursuant to Executive Order N-71-20.

BARCLAYS OFFICIAL CALIFORNIA CODE OF REGULATIONS
Copyright © 2025 by Barclays Law Publishers All rights reserved

End of Document

14 CCR 1273.05

This document is current through Register 2025, No. 32, August 8, 2025

CA - Barclays Official

§ 1273.05. Turnarounds

(a) Turnarounds are required on Driveways and Dead-end Roads.

(b) The minimum turning radius for a turnaround shall be forty (40) feet, not including parking, in accordance with the figures in 14 CCR]1273.05(e) and 1273.05(f). If a hammerhead/T is used instead, the top of the "T" shall be a minimum of sixty (60) feet in length.

(c) Driveways exceeding 150 feet in length, but less than 800 feet in length, shall provide a turnout near the midpoint of the Driveway. Where the driveway exceeds 800 feet, turnouts shall be provided no more than 400 feet apart.

(d) A turnaround shall be provided on Driveways over 300 feet in length and shall be within fifty (50) feet of the building.

(d) Each Dead-end Road shall have a turnaround constructed at its terminus. Where parcels are zoned five (5) acres or larger, turnarounds shall be provided at a maximum of 1,320 foot intervals.

(e) Figure A. Turnarounds on roads with two ten-foot traffic lanes.

Figure A/Image 1 is a visual representation of paragraph (b).

(f) Figure B. Turnarounds on driveways with one ten-foot traffic lane.

Figure B/Image 2 is a visual representation of paragraph (b).

Statutory Authority

AUTHORITY:

NOTE : Authority cited: Section 4290, Public Resources Code. Reference: Sections 4290 and 4291, Public Resources Code.

History

HISTORY

1. New section filed 5-30-91; operative 5-30-91 pursuant to Government Code section 11346.2(d) (Register 91, No. 27).

2. Amendment of section and new illustration filed 4-27-2015; operative 1-1-2016 (Register 2015, No. 18).

3. Amendment of section heading and section filed 9-6-2019; operative 1-1-2020 (Register 2019, No. 36).

4. Amendment filed 1-31-2023; operative 4-1-2023 (Register 2023, No. 5). Transmission deadline specified in Government Code section 11346.4(b) extended 60 calendar days pursuant to Executive Order N-40-20 and an additional 60 calendar days pursuant to Executive Order N-71-20. Filing deadline specified in Government Code section 11349.3(a) extended 60 calendar days pursuant to Executive Order N-40-20 and an additional 60 calendar days pursuant to Executive Order N-71-20.

BARCLAYS OFFICIAL CALIFORNIA CODE OF REGULATIONS
Copyright © 2025 by Barclays Law Publishers All rights reserved

End of Document

14 CCR 1273.06

This document is current through Register 2025, No. 32, August 8, 2025

§ 1273.06. Turnouts

Turnouts shall be a minimum of twelve (12) feet wide and thirty (30) feet long with a minimum twenty-five (25) foot taper on each end.

Statutory Authority

AUTHORITY:

NOTE : Authority cited: Section 4290, Public Resources Code. Reference: Sections 4290 and 4291, Public Resources Code.

History

HISTORY

1. New section filed 5-30-91; operative 5-30-91 pursuant to Government Code section 11346.2(d) (Register 91, No. 27).

2. Amendment filed 4-27-2015; operative 1-1-2016 (Register 2015, No. 18).

3. Amendment of section heading filed 9-6-2019; operative 1-1-2020 (Register 2019, No. 36).

4. Amendment of section heading filed 1-31-2023; operative 4-1-2023 (Register 2023, No. 5). Transmission deadline specified in Government Code section 11346.4(b) extended 60 calendar days pursuant to Executive Order N-40-20 and an additional 60 calendar days pursuant to Executive Order N-71-20. Filing deadline specified in Government Code section 11349.3(a) extended 60 calendar days pursuant to Executive Order N-40-20 and an additional 60 calendar days pursuant to Executive Order N-71-20.

BARCLAYS OFFICIAL CALIFORNIA CODE OF REGULATIONS
Copyright © 2025 by Barclays Law Publishers All rights reserved

End of Document

14 CCR 1273.07

This document is current through Register 2025, No. 32, August 8, 2025

CA - Barclays Official

§ 1273.07. Road and Driveway Structures

(a) Appropriate signing, including but not limited to weight or vertical clearance limitations, One-way Road or single traffic lane conditions, shall reflect the capability of each bridge.

(b) Where a bridge or an elevated surface is part of a Fire Apparatus access road, the bridge shall be constructed and maintained in accordance with the American Association of State and Highway Transportation Officials Standard Specifications for Highway Bridges, 17th Edition, published 2002 (known as AASHTO HB-17), hereby incorporated by reference. Bridges and elevated surfaces shall be designed for a live load sufficient to carry the imposed loads of fire apparatus. Vehicle load limits shall be posted at both entrances to bridges when required by the local authority having jurisdiction.

(c) Where elevated surfaces designed for emergency vehicle use are adjacent to surfaces which are not designed for such use, barriers, or signs, or both, as approved by the local authority having jurisdiction, shall be installed and maintained.

(d) A bridge with only one traffic lane may be authorized by the Local Jurisdiction; however, it shall provide for unobstructed visibility from one end to the other and turnouts at both ends.

Statutory Authority

AUTHORITY:

NOTE : Authority cited: Section 4290, Public Resources Code. Reference: Sections 4290 and 4291, Public Resources Code.

History

HISTORY

1. New section filed 5-30-91; operative 5-30-91 pursuant to Government Code section 11346.2(d) (Register 91, No. 27).

2. Amendment of subsections (a) and (c) filed 4-27-2015; operative 1-1-2016 (Register 2015, No. 18).

3. Amendment of section heading and section filed 9-6-2019; operative 1-1-2020 (Register 2019, No. 36).

4. Amendment of subsections (a), (b) and (d) filed 1-31-2023; operative 4-1-2023 (Register 2023, No. 5). Transmission deadline specified in Government Code section 11346.4(b) extended 60 calendar days pursuant to Executive Order N-40-20 and an additional 60 calendar days pursuant to Executive Order N-71-20. Filing deadline

specified in Government Code section 11349.3(a) extended 60 calendar days pursuant to Executive Order N-40-20 and an additional 60 calendar days pursuant to Executive Order N-71-20.

BARCLAYS OFFICIAL CALIFORNIA CODE OF REGULATIONS
Copyright © 2025 by Barclays Law Publishers All rights reserved

End of Document

14 CCR 1273.08

This document is current through Register 2025, No. 32, August 8, 2025

CA - Barclays Official

§ 1273.08. Dead-end Roads

(a) The maximum length of a Dead-end Road, including all Dead-end Roads accessed from that Dead-end Road, shall not exceed the following cumulative lengths, regardless of the number of parcels served:

parcels zoned for less than one acre - 800 feet

parcels zoned for 1 acre to 4.99 acres - 1,320 feet

parcels zoned for 5 acres to 19.99 acres - 2,640 feet

parcels zoned for 20 acres or larger - 5,280 feet

All lengths shall be measured from the edge of the Road surface at the intersection that begins the Road to the end of the Road surface at its farthest point. Where a dead-end road crosses areas of differing zoned parcel sizes requiring different length limits, the shortest allowable length shall apply.

(b) See 14 CCR 1273.05 for dead-end road turnaround requirements.

Statutory Authority

AUTHORITY:

NOTE : Authority cited: Section 4290, Public Resources Code. Reference: Sections 4290 and 4291, Public Resources Code.

History

HISTORY

1. New section filed 5-30-91; operative 5-30-91 pursuant to Government Code section 11346.2(d) (Register 91, No. 27).

2. Amendment filed 4-27-2015; operative 1-1-2016 (Register 2015, No. 18).

3. Amendment of section heading and section filed 9-6-2019; operative 1-1-2020 (Register 2019, No. 36).

4. Amendment of subsection (a) filed 1-31-2023; operative 4-1-2023 (Register 2023, No. 5). Transmission deadline specified in Government Code section 11346.4(b) extended 60 calendar days pursuant to Executive Order N-40-20 and an additional 60 calendar days pursuant to Executive Order N-71-20. Filing deadline specified in

Government Code section 11349.3(a) extended 60 calendar days pursuant to Executive Order N-40-20 and an additional 60 calendar days pursuant to Executive Order N-71-20.

BARCLAYS OFFICIAL CALIFORNIA CODE OF REGULATIONS
Copyright © 2025 by Barclays Law Publishers All rights reserved

End of Document

14 CCR 1273.09

This document is current through Register 2025, No. 32, August 8, 2025

CA - Barclays Official

§ 1273.09. Gate Entrances

(a) Gate entrances shall be at least two (2) feet wider than the width of the traffic lane(s) serving that gate and a minimum width of fourteen (14) feet unobstructed horizontal clearance and unobstructed vertical clearance of thirteen feet, six inches (13'v 6").

(b) All gates providing access from a Road to a Driveway shall be located at least thirty (30) feet from the roadway and shall open to allow a vehicle to stop without obstructing traffic on that Road.

(c) Where a One-way Road with a single traffic lane provides access to a gated entrance, a forty (40) foot turning radius shall be used.

(d) Security gates shall not be installed without approval. Where security gates are installed, they shall have an approved means of emergency operation. Approval shall be by the local authority having jurisdiction. The security gates and the emergency operation shall be maintained operational at all times.

Statutory Authority

AUTHORITY:

NOTE : Authority cited: Section 4290, Public Resources Code. Reference: Sections 4290 and 4291, Public Resources Code.

History

HISTORY

1. New section filed 5-30-91; operative 5-30-91 pursuant to Government Code section 11346.2(d) (Register 91, No. 27).

2. Amendment of section heading and section filed 9-6-2019; operative 1-1-2020 (Register 2019, No. 36).

3. Amendment of subsections (b) and (c) filed 1-31-2023; operative 4-1-2023 (Register 2023, No. 5). Transmission deadline specified in Government Code section 11346.4(b) extended 60 calendar days pursuant to Executive Order N-40-20 and an additional 60 calendar days pursuant to Executive Order N-71-20. Filing deadline specified in Government Code section 11349.3(a) extended 60 calendar days pursuant to Executive Order N-40-20 and an additional 60 calendar days pursuant to Executive Order N-71-20.

Copyright © 2025 by Barclays Law Publishers All rights reserved

End of Document

14 CCR 1273.10

This document is current through Register 2025, No. 32, August 8, 2025

§ 1273.10 Driveways [Repealed]

Statutory Authority

AUTHORITY:

NOTE: Authority cited: Section 4290, Public Resources Code. Reference: Sections 4290 and 4291, Public Resources Code.

History

HISTORY

1. New section filed 5-30-91; operative 5-30-91 pursuant to Government Code section 11346.2(d) (Register 91, No. 27).

2. Amendment filed 4-27-2015; operative 1-1-2016 (Register 2015, No. 18).

3. Repealer filed 9-6-2019; operative 1-1-2020 (Register 2019, No. 36).

BARCLAYS OFFICIAL CALIFORNIA CODE OF REGULATIONS
Copyright © 2025 by Barclays Law Publishers All rights reserved

End of Document

14 CCR 1273.11

This document is current through Register 2025, No. 32, August 8, 2025

§ 1273.11 Gate Entrances [Repealed]

Statutory Authority

AUTHORITY:

NOTE: Authority cited: Section 4290, Public Resources Code. Reference: Sections 4290 and 4291, Public Resources Code.

History

HISTORY

1. New section filed 5-30-91; operative 5-30-91 pursuant to Government Code section 11346.2(d) (Register 91, No. 27).

2. Amendment of subsection (a), new subsection (c), subsection relettering and amendment of newly designated subsection (d) filed 4-27-2015; operative 1-1-2016 (Register 2015, No. 18).

3. Repealer filed 9-6-2019; operative 1-1-2020 (Register 2019, No. 36).

BARCLAYS OFFICIAL CALIFORNIA CODE OF REGULATIONS
Copyright © 2025 by Barclays Law Publishers All rights reserved

End of Document

14 CCR 1274.00

This document is current through Register 2025, No. 32, August 8, 2025

CA - Barclays Official

§ 1274.00. Intent

To facilitate locating a fire and to avoid delays in response, all newly constructed or approved Roads and Buildings shall be designated by names or numbers posted on signs clearly visible and legible from the Road. This section shall not restrict the size of letters or numbers appearing on road signs for other purposes.

Statutory Authority

AUTHORITY:

NOTE : Authority cited: Section 4290, Public Resources Code. Reference: Sections 4290 and 4291, Public Resources Code.

History

HISTORY

1. New section filed 5-30-91; operative 5-30-91 pursuant to Government Code section 11346.2(d) (Register 91, No. 27).

2. Amendment filed 9-6-2019; operative 1-1-2020 (Register 2019, No. 36).

3. Amendment filed 1-31-2023; operative 4-1-2023 (Register 2023, No. 5). Transmission deadline specified in Government Code section 11346.4(b) extended 60 calendar days pursuant to Executive Order N-40-20 and an additional 60 calendar days pursuant to Executive Order N-71-20. Filing deadline specified in Government Code section 11349.3(a) extended 60 calendar days pursuant to Executive Order N-40-20 and an additional 60 calendar days pursuant to Executive Order N-71-20.

BARCLAYS OFFICIAL CALIFORNIA CODE OF REGULATIONS
Copyright © 2025 by Barclays Law Publishers All rights reserved

End of Document

14 CCR 1274.01

This document is current through Register 2025, No. 32, August 8, 2025

CA - Barclays Official

§ 1274.01. Road Signs

(a) Newly constructed or approved Roads must be identified by a name or number through a consistent system that provides for sequenced or patterned numbering and/or non-duplicative naming within each Local Jurisdiction. This section does not require any entity to rename or renumber existing roads, nor shall a Road providing access only to a single commercial or industrial Occupancy require naming or numbering.

(b) The size of letters, numbers, and symbols for Road signs shall be a minimum four (4) inch letter height, half inch (.5) inch stroke, reflectorized, contrasting with the background color of the sign.

Statutory Authority

AUTHORITY:

NOTE : Authority cited: Section 4290, Public Resources Code. Reference: Sections 4290 and 4291, Public Resources Code.

History

HISTORY

1. New section filed 5-30-91; operative 5-30-91 pursuant to Government Code section 11346.2(d) (Register 91, No. 27).

2. Amendment filed 4-27-2015; operative 1-1-2016 (Register 2015, No. 18).

3. Amendment of section heading and section filed 9-6-2019; operative 1-1-2020 (Register 2019, No. 36).

4. Amendment filed 1-31-2023; operative 4-1-2023 (Register 2023, No. 5). Transmission deadline specified in Government Code section 11346.4(b) extended 60 calendar days pursuant to Executive Order N-40-20 and an additional 60 calendar days pursuant to Executive Order N-71-20. Filing deadline specified in Government Code section 11349.3(a) extended 60 calendar days pursuant to Executive Order N-40-20 and an additional 60 calendar days pursuant to Executive Order N-71-20.

BARCLAYS OFFICIAL CALIFORNIA CODE OF REGULATIONS
Copyright © 2025 by Barclays Law Publishers All rights reserved

End of Document

14 CCR 1274.02

This document is current through Register 2025, No. 32, August 8, 2025

CA - Barclays Official

§ 1274.02. Road Sign Installation, Location, and Visibility

(a) Road signs shall be visible and legible from both directions of vehicle travel for a distance of at least one hundred (100) feet.

(b) Signs required by this article identifying intersecting Roads shall be placed at the intersection of those Roads.

(c) A sign identifying traffic access or flow limitations, including but not limited to weight or vertical clearance limitations, dead-end roads, one-way roads, or single lane conditions, shall be placed:

(1) at the intersection preceding the traffic access limitation, and

(2) no more than one hundred (100) feet before such traffic access limitation.

(d) Road signs required by this article shall be posted at the beginning of construction and shall be maintained thereafter.

Statutory Authority

AUTHORITY:

NOTE : Authority cited: Section 4290, Public Resources Code. Reference: Sections 4290 and 4291, Public Resources Code.

History

HISTORY

1. New section filed 5-30-91; operative 5-30-91 pursuant to Government Code section 11346.2(d) (Register 91, No. 27).

2. Amendment of section heading and section filed 9-6-2019; operative 1-1-2020 (Register 2019, No. 36).

3. Amendment of subsection (b) and renumbering of former subsections (c)(i)-(c)(ii) to (c)(1)-(c)(2) filed 1-31-2023; operative 4-1-2023 (Register 2023, No. 5). Transmission deadline specified in Government Code section 11346.4(b) extended 60 calendar days pursuant to Executive Order N-40-20 and an additional 60 calendar days pursuant to Executive Order N-71-20. Filing deadline specified in Government Code section 11349.3(a) extended 60 calendar days pursuant to Executive Order N-40-20 and an additional 60 calendar days pursuant to Executive Order N-71-20.

BARCLAYS OFFICIAL CALIFORNIA CODE OF REGULATIONS
Copyright © 2025 by Barclays Law Publishers All rights reserved

End of Document

14 CCR 1274.03

This document is current through Register 2025, No. 32, August 8, 2025

CA - Barclays Official

§ 1274.03. Addresses for Buildings

(a) All Buildings shall be issued an address by the Local Jurisdiction which conforms to that jurisdiction's overall address system. Utility and miscellaneous Group U Buildings are not required to have a separate address; however, each Residential Unit within a Building shall be separately identified.

(b) The size of letters, numbers, and symbols for addresses shall conform to the standards in the California Fire Code, California Code of Regulations title 24, part 9.

(c) Addresses for residential Buildings shall be reflectorized.

Statutory Authority

AUTHORITY:

NOTE : Authority cited: Section 4290, Public Resources Code. Reference: Sections 4290 and 4291, Public Resources Code.

History

HISTORY

1. New section filed 5-30-91; operative 5-30-91 pursuant to Government Code section 11346.2(d) (Register 91, No. 27).

2. Amendment of section heading and section filed 9-6-2019; operative 1-1-2020 (Register 2019, No. 36).

3. Amendment of subsections (a) and (c) filed 1-31-2023; operative 4-1-2023 (Register 2023, No. 5). Transmission deadline specified in Government Code section 11346.4(b) extended 60 calendar days pursuant to Executive Order N-40-20 and an additional 60 calendar days pursuant to Executive Order N-71-20. Filing deadline specified in Government Code section 11349.3(a) extended 60 calendar days pursuant to Executive Order N-40-20 and an additional 60 calendar days pursuant to Executive Order N-71-20.

BARCLAYS OFFICIAL CALIFORNIA CODE OF REGULATIONS
Copyright © 2025 by Barclays Law Publishers All rights reserved

End of Document

14 CCR 1274.04

This document is current through Register 2025, No. 32, August 8, 2025

CA - Barclays Official

§ 1274.04. Address Installation, Location, and Visibility

(a) All buildings shall have a permanently posted address which shall be plainly legible and visible from the Road fronting the property.

(b) Where access is by means of a private Road and the address identification cannot be viewed from the public way, an unobstructed sign or other means shall be used so that the address is visible from the public way.

(c) Address signs along one-way Roads shall be visible from both directions.

(d) Where multiple addresses are required at a single driveway, they shall be mounted on a single sign or post.

(e) Where a Road provides access solely to a single commercial or industrial business, the address sign shall be placed at the nearest Road intersection providing access to that site, or otherwise posted to provide for unobstructed visibility from that intersection.

(f) In all cases, the address shall be posted at the beginning of construction and shall be maintained thereafter.

Statutory Authority

AUTHORITY:

NOTE : Authority cited: Section 4290, Public Resources Code. Reference: Sections 4290 and 4291, Public Resources Code.

History

HISTORY

1. New section filed 5-30-91; operative 5-30-91 pursuant to Government Code section 11346.2(d) (Register 91, No. 27).

2. Amendment of section heading and section filed 9-6-2019; operative 1-1-2020 (Register 2019, No. 36).

3. Amendment of subsections (a)-(c) and (e) filed 1-31-2023; operative 4-1-2023 (Register 2023, No. 5). Transmission deadline specified in Government Code section 11346.4(b) extended 60 calendar days pursuant to Executive Order N-40-20 and an additional 60 calendar days pursuant to Executive Order N-71-20. Filing deadline

specified in Government Code section 11349.3(a) extended 60 calendar days pursuant to Executive Order N-40-20 and an additional 60 calendar days pursuant to Executive Order N-71-20.

BARCLAYS OFFICIAL CALIFORNIA CODE OF REGULATIONS
Copyright © 2025 by Barclays Law Publishers All rights reserved

End of Document

14 CCR 1274.05

This document is current through Register 2025, No. 32, August 8, 2025

§ 1274.05 Intersecting Roads, Streets and Private Lanes [Repealed]

Statutory Authority

AUTHORITY:

NOTE: Authority cited: Section 4290, Public Resources Code. Reference: Sections 4290 and 4291, Public Resources Code.

History

HISTORY

1. New section filed 5-30-91; operative 5-30-91 pursuant to Government Code section 11346.2(d) (Register 91, No. 27).

2. Repealer filed 9-6-2019; operative 1-1-2020 (Register 2019, No. 36).

BARCLAYS OFFICIAL CALIFORNIA CODE OF REGULATIONS
Copyright © 2025 by Barclays Law Publishers All rights reserved

End of Document

14 CCR 1274.06

This document is current through Register 2025, No. 32, August 8, 2025

§ 1274.06 Signs Identifying Traffic Access Limitations [Repealed]

Statutory Authority

AUTHORITY:

NOTE: Authority cited: Section 4290, Public Resources Code. Reference: Sections 4290 and 4291, Public Resources Code.

History

HISTORY

1. New section filed 5-30-91; operative 5-30-91 pursuant to Government Code section 11346.2(d) (Register 91, No. 27).

2. Repealer filed 9-6-2019; operative 1-1-2020 (Register 2019, No. 36).

BARCLAYS OFFICIAL CALIFORNIA CODE OF REGULATIONS
Copyright © 2025 by Barclays Law Publishers All rights reserved

End of Document

14 CCR 1274.07

This document is current through Register 2025, No. 32, August 8, 2025

§ 1274.07 Installation of Road, Street and Private Lane Signs [Repealed]

Statutory Authority

AUTHORITY:

NOTE: Authority cited: Section 4290, Public Resources Code. Reference: Sections 4290 and 4291, Public Resources Code.

History

HISTORY

1. New section filed 5-30-91; operative 5-30-91 pursuant to Government Code section 11346.2(d) (Register 91, No. 27).

2. Repealer filed 9-6-2019; operative 1-1-2020 (Register 2019, No. 36).

BARCLAYS OFFICIAL CALIFORNIA CODE OF REGULATIONS
Copyright © 2025 by Barclays Law Publishers All rights reserved

End of Document

14 CCR 1274.08

This document is current through Register 2025, No. 32, August 8, 2025

§ 1274.08 Addresses for Buildings [Repealed]

Statutory Authority

AUTHORITY:

NOTE: Authority cited: Section 4290, Public Resources Code. Reference: Sections 4290 and 4291, Public Resources Code.

History

HISTORY

1. New section filed 5-30-91; operative 5-30-91 pursuant to Government Code section 11346.2(d) (Register 91, No. 27).

2. Repealer filed 9-6-2019; operative 1-1-2020 (Register 2019, No. 36).

BARCLAYS OFFICIAL CALIFORNIA CODE OF REGULATIONS
Copyright © 2025 by Barclays Law Publishers All rights reserved

End of Document

14 CCR 1274.09

This document is current through Register 2025, No. 32, August 8, 2025

§ 1274.09 Size of Letters, Numbers and Symbols for Addresses [Repealed]

Statutory Authority

AUTHORITY:

NOTE: Authority cited: Section 4290, Public Resources Code. Reference: Sections 4290 and 4291, Public Resources Code.

History

HISTORY

1. New section filed 5-30-91; operative 5-30-91 pursuant to Government Code section 11346.2(d) (Register 91, No. 27).

2. Amendment filed 4-27-2015; operative 1-1-2016 (Register 2015, No. 18).

3. Repealer filed 9-6-2019; operative 1-1-2020 (Register 2019, No. 36).

BARCLAYS OFFICIAL CALIFORNIA CODE OF REGULATIONS
Copyright © 2025 by Barclays Law Publishers All rights reserved

14 CCR 1274.10

This document is current through Register 2025, No. 32, August 8, 2025

§ 1274.10 Installation, Location and Visibility of Addresses [Repealed]

Statutory Authority

AUTHORITY:

NOTE: Authority cited: Section 4290, Public Resources Code. Reference: Sections 4290 and 4291, Public Resources Code.

History

HISTORY

1. New section filed 5-30-91; operative 5-30-91 pursuant to Government Code section 11346.2(d) (Register 91, No. 27).

2. Repealer filed 9-6-2019; operative 1-1-2020 (Register 2019, No. 36).

BARCLAYS OFFICIAL CALIFORNIA CODE OF REGULATIONS
Copyright © 2025 by Barclays Law Publishers All rights reserved

End of Document

14 CCR 1275.00

This document is current through Register 2025, No. 32, August 8, 2025

CA - Barclays Official

§ 1275.00. Intent

Emergency water for Wildfire protection shall be available, accessible, and maintained in quantities and locations specified in the statute and these regulations in order to attack a Wildfire or defend property from a Wildfire.

Statutory Authority

AUTHORITY:

NOTE : Authority cited: Section 4290, Public Resources Code. Reference: Sections 4290 and 4291, Public Resources Code.

History

HISTORY

1. New section filed 5-30-91; operative 5-30-91 pursuant to Government Code section 11346.2(d) (Register 91, No. 27).

2. Amendment filed 4-27-2015; operative 1-1-2016 (Register 2015, No. 18).

3. Amendment filed 9-6-2019; operative 1-1-2020 (Register 2019, No. 36).

4. Amendment filed 1-31-2023; operative 4-1-2023 (Register 2023, No. 5). Transmission deadline specified in Government Code section 11346.4(b) extended 60 calendar days pursuant to Executive Order N-40-20 and an additional 60 calendar days pursuant to Executive Order N-71-20. Filing deadline specified in Government Code section 11349.3(a) extended 60 calendar days pursuant to Executive Order N-40-20 and an additional 60 calendar days pursuant to Executive Order N-71-20.

BARCLAYS OFFICIAL CALIFORNIA CODE OF REGULATIONS
Copyright © 2025 by Barclays Law Publishers All rights reserved

End of Document

14 CCR 1275.01

This document is current through Register 2025, No. 32, August 8, 2025

CA - Barclays Official

§ 1275.01. Application

The provisions of this article shall apply in the tentative and parcel map process when new parcels are approved by the Local Jurisdiction.

Statutory Authority

AUTHORITY:

NOTE : Authority cited: Section 4290, Public Resources Code. Reference: Sections 4290 and 4291, Public Resources Code.

History

HISTORY

1. New section filed 5-30-91; operative 5-30-91 pursuant to Government Code section 11346.2(d) (Register 91, No. 27).

2. Amendment filed 4-27-2015; operative 1-1-2016 (Register 2015, No. 18).

3. Amendment filed 9-6-2019; operative 1-1-2020 (Register 2019, No. 36).

4. Amendment filed 1-31-2023; operative 4-1-2023 (Register 2023, No. 5). Transmission deadline specified in Government Code section 11346.4(b) extended 60 calendar days pursuant to Executive Order N-40-20 and an additional 60 calendar days pursuant to Executive Order N-71-20. Filing deadline specified in Government Code section 11349.3(a) extended 60 calendar days pursuant to Executive Order N-40-20 and an additional 60 calendar days pursuant to Executive Order N-71-20.

BARCLAYS OFFICIAL CALIFORNIA CODE OF REGULATIONS
Copyright © 2025 by Barclays Law Publishers All rights reserved

End of Document

14 CCR 1275.02

This document is current through Register 2025, No. 32, August 8, 2025

CA - Barclays Official

§ 1275.02. Water Supply

(a) When a water supply for structure defense is required to be installed, such protection shall be installed and made serviceable prior to and during the time of construction except when alternative methods of protection are provided and approved by the Local Jurisdiction.

(b) Water systems equaling or exceeding the California Fire Code, California Code of Regulations title 24, part 9, or, where a municipal-type water supply is unavailable, National Fire Protection Association (NFPA) 1142, "Standard on Water Supplies for Suburban and Rural Fire Fighting," 2017 Edition, hereby incorporated by reference, shall be accepted as meeting the requirements of this article.

(c) Such emergency water may be provided in a fire agency mobile water tender, or naturally occurring or man made containment structure, as long as the specified quantity is immediately available.

(d) Nothing in this article prohibits the combined storage of emergency Wildfire and structural firefighting water supplies unless so prohibited by local ordinance or specified by the local fire agency.

(e) Where freeze or crash protection is required by Local Jurisdictions, such protection measures shall be provided.

Statutory Authority

AUTHORITY:

NOTE : Authority cited: Section 4290, Public Resources Code. Reference: Sections 4290 and 4291, Public Resources Code.

History

HISTORY

1. Renumbering of former section 1275.10 to new section 1275.02, including amendment of section heading and section, filed 9-6-2019; operative 1-1-2020 (Register 2019, No. 36).

2. Amendment of subsections (a), (d) and (e) filed 1-31-2023; operative 4-1-2023 (Register 2023, No. 5). Transmission deadline specified in Government Code section 11346.4(b) extended 60 calendar days pursuant to Executive Order N-40-20 and an additional 60 calendar days pursuant to Executive Order N-71-20. Filing deadline specified in Government Code section 11349.3(a) extended 60 calendar days pursuant to Executive Order N-40-20 and an additional 60 calendar days pursuant to Executive Order N-71-20.

BARCLAYS OFFICIAL CALIFORNIA CODE OF REGULATIONS
Copyright © 2025 by Barclays Law Publishers All rights reserved

End of Document

14 CCR 1275.03

This document is current through Register 2025, No. 32, August 8, 2025

CA - Barclays Official

§ 1275.03. Hydrants

(a) The Fire Hydrant shall be eighteen (18) inches above the finished surface. Its location in relation to the Road or dRiveway and to the Building(s) or Structure(s) it serves shall comply with California Fire Code, California Code of Regulations title 24, part 9, Chapter 5, and Appendix C.

(b) The Fire Hydrant head shall be a two and half (2 1/2) inch National Hose male thread with cap for pressure and gravity flow systems and four and a half (4 1/2) inch for draft systems.

(c) Fire Hydrants shall be wet or dry barrel and have suitable freeze or crash protection as required by the Local Jurisdiction.

Statutory Authority

AUTHORITY:

NOTE : Authority cited: Section 4290, Public Resources Code. Reference: Sections 4290 and 4291, Public Resources Code.

History

HISTORY

1. Renumbering of former section 1275.15 to new section 1275.03, including amendment of section heading and section, filed 9-6-2019; operative 1-1-2020 (Register 2019, No. 36).

2. Amendment of section heading and section filed 1-31-2023; operative 4-1-2023 (Register 2023, No. 5). Transmission deadline specified in Government Code section 11346.4(b) extended 60 calendar days pursuant to Executive Order N-40-20 and an additional 60 calendar days pursuant to Executive Order N-71-20. Filing deadline specified in Government Code section 11349.3(a) extended 60 calendar days pursuant to Executive Order N-40-20 and an additional 60 calendar days pursuant to Executive Order N-71-20.

BARCLAYS OFFICIAL CALIFORNIA CODE OF REGULATIONS
Copyright © 2025 by Barclays Law Publishers All rights reserved

End of Document

14 CCR 1275.04

This document is current through Register 2025, No. 32, August 8, 2025

CA - Barclays Official

§ 1275.04. Signing of Water Sources

(a) Each Fire Hydrant or access to water shall be identified as follows:

(1) if located along a Driveway, a reflectorized blue marker, with a minimum dimension of three (3) inches shall be located on the Driveway address sign and mounted on a fire retardant post, or

(2) if located along a Road,

(1) a reflectorized blue marker, with a minimum dimension of three (3) inches, shall be mounted on a fire retardant post. The sign post shall be within three (3) feet of said Fire Hydrant with the sign no less than three (3) feet nor greater than five (5) feet above ground, in a horizontal position and visible from the Driveway, or

(2) as specified in the State Fire Marshal's Guidelines for Fire Hydrant Markings Along State Highways and Freeways, May 1988.

Statutory Authority

AUTHORITY:

NOTE : Authority cited: Section 4290, Public Resources Code. Reference: Sections 4290 and 4291, Public Resources Code.

History

HISTORY

1. Renumbering and amendment of former section 1275.20 to new section 1275.04 filed 9-6-2019; operative 1-1-2020 (Register 2019, No. 36).

2. Amendment filed 1-31-2023; operative 4-1-2023 (Register 2023, No. 5). Transmission deadline specified in Government Code section 11346.4(b) extended 60 calendar days pursuant to Executive Order N-40-20 and an additional 60 calendar days pursuant to Executive Order N-71-20. Filing deadline specified in Government Code section 11349.3(a) extended 60 calendar days pursuant to Executive Order N-40-20 and an additional 60 calendar days pursuant to Executive Order N-71-20.

BARCLAYS OFFICIAL CALIFORNIA CODE OF REGULATIONS
Copyright © 2025 by Barclays Law Publishers All rights reserved

End of Document

14 CCR 1275.10

This document is current through Register 2025, No. 32, August 8, 2025

CA - Barclays Official

§ 1275.10 General Standards [Renumbered]

Statutory Authority

AUTHORITY:

NOTE: Authority cited: Section 4290, Public Resources Code. Reference: Sections 4290 and 4291, Public Resources Code.

History

HISTORY

1. New section filed 5-30-91; operative 5-30-91 pursuant to Government Code section 11346.2(d) (Register 91, No. 27).

2. Amendment filed 4-27-2015; operative 1-1-2016 (Register 2015, No. 18).

3. Renumbering of former section 1275.10 to new section 1275.02 filed 9-6-2019; operative 1-1-2020 (Register 2019, No. 36).

BARCLAYS OFFICIAL CALIFORNIA CODE OF REGULATIONS
Copyright © 2025 by Barclays Law Publishers All rights reserved

End of Document

14 CCR 1275.15

This document is current through Register 2025, No. 32, August 8, 2025

CA - Barclays Official

§ 1275.15 Hydrant/Fire Valve [Renumbered]

Statutory Authority

AUTHORITY:

NOTE: Authority cited: Section 4290, Public Resources Code. Reference: Sections 4290 and 4291, Public Resources Code.

History

HISTORY

1. New section filed 5-30-91; operative 5-30-91 pursuant to Government Code section 11346.2(d) (Register 91, No. 27).

2. Amendment filed 4-27-2015; operative 1-1-2016 (Register 2015, No. 18).

3. Renumbering of former section 1275.15 to new section 1275.03 filed 9-6-2019; operative 1-1-2020 (Register 2019, No. 36).

4. Editorial correction implementing renumbering of section (Register 2019, No. 38).

BARCLAYS OFFICIAL CALIFORNIA CODE OF REGULATIONS
Copyright © 2025 by Barclays Law Publishers All rights reserved

End of Document

14 CCR 1275.20

This document is current through Register 2025, No. 32, August 8, 2025

CA - Barclays Official

§ 1275.20 Signing of Water Sources [Renumbered]

Statutory Authority

AUTHORITY:

NOTE: Authority cited: Section 4290, Public Resources Code. Reference: Sections 4290 and 4291, Public Resources Code.

History

HISTORY

1. New section filed 5-30-91; operative 5-30-91 pursuant to Government Code section 11346.2(d) (Register 91, No. 27).

2. Renumbering of former section 1275.20 to new section 1275.04 filed 9-6-2019; operative 1-1-2020 (Register 2019, No. 36).

3. Editorial correction removing inadvertently retained text (Register 2019, No. 38).

BARCLAYS OFFICIAL CALIFORNIA CODE OF REGULATIONS
Copyright © 2025 by Barclays Law Publishers All rights reserved

End of Document

14 CCR 1276.00

This document is current through Register 2025, No. 32, August 8, 2025

CA - Barclays Official

§ 1276.00. Intent

To reduce the intensity of a Wildfire, reducing the volume and density of flammable vegetation around Development through strategic fuel modification, parcel siting and Building setbacks, and the protection of Undeveloped Ridgelines shall provide for increased safety for emergency fire equipment, including evacuating civilians, and a point of attack or defense from a Wildfire.

Statutory Authority

AUTHORITY:

NOTE : Authority cited: Section 4290, Public Resources Code. Reference: Sections 4290 and 4291, Public Resources Code.

History

HISTORY

1. New section filed 5-30-91; operative 5-30-91 pursuant to Government Code section 11346.2(d) (Register 91, No. 27).

2. Amendment filed 4-27-2015; operative 1-1-2016 (Register 2015, No. 18).

3. Amendment filed 9-6-2019; operative 1-1-2020 (Register 2019, No. 36).

4. Amendment of article heading and amendment of section filed 1-31-2023; operative 4-1-2023 (Register 2023, No. 5). Transmission deadline specified in Government Code section 11346.4(b) extended 60 calendar days pursuant to Executive Order N-40-20 and an additional 60 calendar days pursuant to Executive Order N-71-20. Filing deadline specified in Government Code section 11349.3(a) extended 60 calendar days pursuant to Executive Order N-40-20 and an additional 60 calendar days pursuant to Executive Order N-71-20.

BARCLAYS OFFICIAL CALIFORNIA CODE OF REGULATIONS
Copyright © 2025 by Barclays Law Publishers All rights reserved

14 CCR 1276.01

This document is current through Register 2025, No. 32, August 8, 2025

CA - Barclays Official

§ 1276.01. Building and Parcel Siting and Setbacks

(a) All parcels shall provide a minimum thirty (30) foot setback for all Buildings from all property lines and/or the center of a Road, except as provided for in subsection (b).

(b) 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 such as, but not limited to:

(1) non-combustible block walls or fences; or

(2) non-combustible material extending five (5) feet horizontally from the furthest extent of the Building; or

(3) hardscape landscaping; or

(4) a reduction of exposed windows on the side of the Structure with a less than thirty (30) foot setback; or

(5) the most protective requirements in the California Building Code, California Code of Regulations Title 24, Part 2, Chapter 7A, as required by the Local Jurisdiction.

Statutory Authority

AUTHORITY:

NOTE : Authority cited: Section 4290, Public Resources Code. Reference: Sections 4290 and 4291, Public Resources Code.

History

HISTORY

1. New section filed 5-30-91; operative 5-30-91 pursuant to Government Code section 11346.2(d) (Register 91, No. 27).

2. Amendment filed 9-6-2019; operative 1-1-2020 (Register 2019, No. 36).

3. Amendment of section heading and section filed 1-31-2023; operative 4-1-2023 (Register 2023, No. 5). Transmission deadline specified in Government Code section 11346.4(b) extended 60 calendar days pursuant to Executive Order N-40-20 and an additional 60 calendar days pursuant to Executive Order N-71-20. Filing deadline specified in Government Code section 11349.3(a) extended 60 calendar days pursuant to Executive Order N-40-20 and an additional 60 calendar days pursuant to Executive Order N-71-20.

BARCLAYS OFFICIAL CALIFORNIA CODE OF REGULATIONS
Copyright © 2025 by Barclays Law Publishers All rights reserved

End of Document

14 CCR 1276.02

This document is current through Register 2025, No. 32, August 8, 2025

CA - Barclays Official

§ 1276.02. Ridgelines

(a) The Local Jurisdiction shall identify Strategic Ridgelines, if any, to reduce fire risk and improve fire protection through an assessment of the following factors:

(1) Topography;

(2) Vegetation;

(3) Proximity to any existing or proposed residential, commercial, or industrial land uses;

(4) Construction where mass grading may significantly alter the topography resulting in the elimination of Ridgeline fire risks;

(5) Ability to support effective fire suppression; and

(6) Other factors, if any, deemed relevant by the Local Jurisdiction.

(b) Preservation of Undeveloped Ridgelines identified as strategically important shall be required pursuant to this section.

(c) New Buildings on Undeveloped Ridgelines identified as strategically important are prohibited, as described in subsections (c)(1), (c)(2), and (c)(3).

(1) New Residential Units are prohibited within or at the top of drainages or other topographic features common to Ridgelines that act as chimneys to funnel convective heat from Wildfires.

(2) Nothing in this subsection shall be construed to alter the extent to which utility infrastructure, including but not limited to wireless telecommunications facilities, as defined in Government Code section 65850.6, subdivision (d)(2), or Storage Group S or Utility and Miscellaneous Group U Structures, may be constructed on Undeveloped Ridgelines.

(3) Local Jurisdictions may approve Buildings on Strategic Ridgelines where Development activities such as mass grading will significantly alter the topography that results in the elimination of Ridgeline fire risks.

(d) The Local Jurisdiction may implement further specific requirements to preserve Undeveloped Ridgelines.

Statutory Authority

AUTHORITY:

NOTE : Authority cited: Section 4290, Public Resources Code. Reference: Sections 4290 and 4291, Public Resources Code.

History

HISTORY

1. New section filed 5-30-91; operative 5-30-91 pursuant to Government Code section 11346.2(d) (Register 91, No. 27).

2. Amendment of section heading and section filed 9-6-2019; operative 1-1-2020 (Register 2019, No. 36).

3. Amendment of section heading and section filed 1-31-2023; operative 4-1-2023 (Register 2023, No. 5). Transmission deadline specified in Government Code section 11346.4(b) extended 60 calendar days pursuant to Executive Order N-40-20 and an additional 60 calendar days pursuant to Executive Order N-71-20. Filing deadline specified in Government Code section 11349.3(a) extended 60 calendar days pursuant to Executive Order N-40-20 and an additional 60 calendar days pursuant to Executive Order N-71-20.

BARCLAYS OFFICIAL CALIFORNIA CODE OF REGULATIONS
Copyright © 2025 by Barclays Law Publishers All rights reserved

End of Document

14 CCR 1276.03

This document is current through Register 2025, No. 32, August 8, 2025

CA - Barclays Official

§ 1276.03. Fuel Breaks

(a) When Building construction meets the following criteria, the Local Jurisdiction shall determine the need and location for Fuel Breaks in consultation with the Fire Authority:

(1) the permitting or approval of three (3) or more new parcels, excluding lot line adjustments as specified in Government Code (GC) section 66412(d); or

(2) an application for a change of zoning increasing zoning intensity or density; or

(3) an application for a change in use permit increasing use intensity or density.

(b) Fuel Breaks required by the Local Jurisdiction, in consultation with the Fire Authority, shall be located, designed, and maintained in a condition that reduces the potential of damaging radiant and convective heat or ember exposure to Access routes, Buildings, or infrastructure within the Development.

(c) Fuel Breaks shall have, at a minimum, one point of entry for fire fighters and any Fire Apparatus. The specific number of entry points and entry requirements shall be determined by the Local Jurisdiction, in consultation with the Fire Authority.

(d) Fuel Breaks may be required at locations such as, but not limited to:

(1) Directly adjacent to defensible space as defined by 14 CCR 1299.02 to reduce radiant and convective heat exposure, ember impacts, or support fire suppression tactics;

(2) Directly adjacent to Roads to manage radiant and convective heat exposure or ember impacts, increase evacuation safety, or support fire suppression tactics;

(3) Directly adjacent to a Hazardous Land Use to limit the spread of fire from such uses, reduce radiant and convective heat exposure, or support fire suppression tactics;

(4) Strategically located along Ridgelines, in Greenbelts, or other locations to reduce radiant and convective heat exposure, ember impacts, or support community level fire suppression tactics.

(e) Fuel Breaks shall be completed prior to the commencement of any permitted construction.

(f) Fuel Breaks shall be constructed using the most ecologically and site appropriate treatment option, such as, but not limited to, prescribed burning, manual treatment, mechanical treatment, prescribed herbivory, and targeted ground application of herbicides.

(g) Where a Local Jurisdiction requires Fuel Breaks, maintenance mechanisms shall be established to ensure the fire behavior objectives and thresholds are maintained over time.

(h) The mechanisms required shall be binding upon the property for which the Fuel Break is established, shall ensure adequate maintenance levels, and may include written legal agreements; permanent fees, taxes, or assessments; assessments through a homeowners' association; or other funding mechanisms.

Statutory Authority

AUTHORITY:

NOTE : Authority cited: Section 4290, Public Resources Code. Reference: Sections 4290 and 4291, Public Resources Code.

History

HISTORY

1. New section filed 5-30-91; operative 5-30-91 pursuant to Government Code section 11346.2(d) (Register 91, No. 27).

2. Amendment filed 4-27-2015; operative 1-1-2016 (Register 2015, No. 18).

3. Amendment of section heading and section filed 9-6-2019; operative 1-1-2020 (Register 2019, No. 36).

4. Repealer and new section filed 1-31-2023; operative 4-1-2023 (Register 2023, No. 5). Transmission deadline specified in Government Code section 11346.4(b) extended 60 calendar days pursuant to Executive Order N-40-20 and an additional 60 calendar days pursuant to Executive Order N-71-20. Filing deadline specified in Government Code section 11349.3(a) extended 60 calendar days pursuant to Executive Order N-40-20 and an additional 60 calendar days pursuant to Executive Order N-71-20.

BARCLAYS OFFICIAL CALIFORNIA CODE OF REGULATIONS
Copyright © 2025 by Barclays Law Publishers All rights reserved

End of Document

14 CCR 1276.04

This document is current through Register 2025, No. 32, August 8, 2025

CA - Barclays Official

§ 1276.04. Greenbelts, Greenways, Open Spaces and Parks

(a) Where a Greenbelt, Greenway, open space, park, landscaped or natural area, or portions thereof, is intended to serve as a Fuel Break, the space or relevant portion thereof shall conform with the requirements in 1276.03 (Fuel Breaks).

Statutory Authority

AUTHORITY:

NOTE : Authority cited: Section 4290, Public Resources Code. Reference: Sections 4290 and 4291, Public Resources Code.

History

HISTORY

1. New section filed 9-6-2019; operative 1-1-2020 (Register 2019, No. 36).

2. Repealer and new section filed 1-31-2023; operative 4-1-2023 (Register 2023, No. 5). Transmission deadline specified in Government Code section 11346.4(b) extended 60 calendar days pursuant to Executive Order N-40-20 and an additional 60 calendar days pursuant to Executive Order N-71-20. Filing deadline specified in Government Code section 11349.3(a) extended 60 calendar days pursuant to Executive Order N-40-20 and an additional 60 calendar days pursuant to Executive Order N-71-20.

BARCLAYS OFFICIAL CALIFORNIA CODE OF REGULATIONS
Copyright © 2025 by Barclays Law Publishers All rights reserved

End of Document

14 CCR 1276.05

This document is current through Register 2025, No. 32, August 8, 2025

§ 1276.05. Disposal of Flammable Vegetation and Fuels

The disposal, including burning or removal to a site approved by the Local Jurisdiction, in consultation with the Fire Authority, of flammable vegetation and fuels caused by site construction, Road, and Driveway construction shall be in accordance with all applicable laws and regulations.

Statutory Authority

AUTHORITY:

NOTE : Authority cited: Section 4290, Public Resources Code. Reference: Sections 4290 and 4291, Public Resources Code.

History

HISTORY

1. New section filed 1-31-2023; operative 4-1-2023 (Register 2023, No. 5). Transmission deadline specified in Government Code section 11346.4(b) extended 60 calendar days pursuant to Executive Order N-40-20 and an additional 60 calendar days pursuant to Executive Order N-71-20. Filing deadline specified in Government Code section 11349.3(a) extended 60 calendar days pursuant to Executive Order N-40-20 and an additional 60 calendar days pursuant to Executive Order N-71-20.

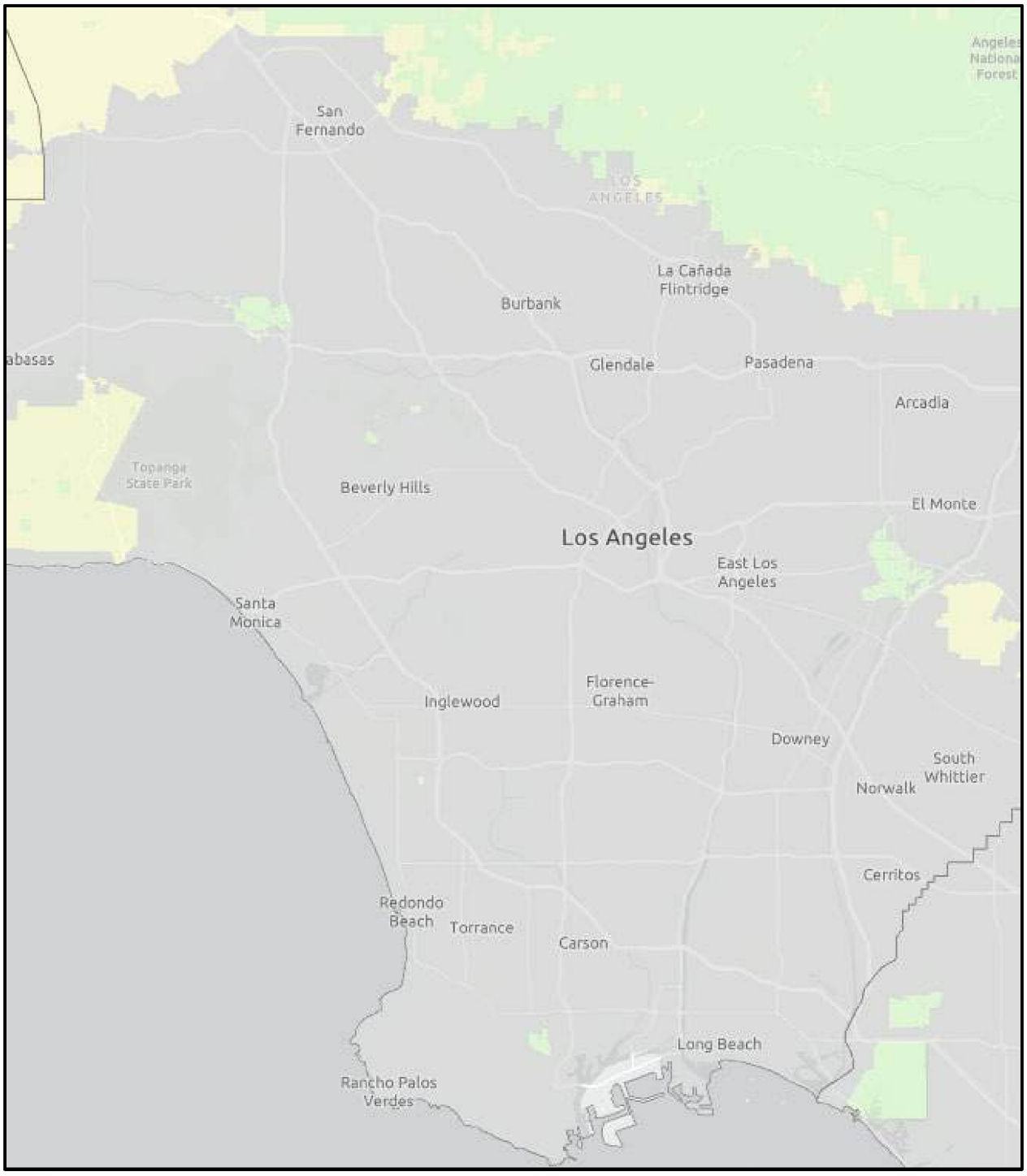
BARCLAYS OFFICIAL CALIFORNIA CODE OF REGULATIONS
Copyright © 2025 by Barclays Law Publishers All rights reserved

End of Document

Channel Law Group, LLP
8383 Wilshire Blvd., Suite 750
Beverly Hills, CA 90211

EXHIBIT 3

EXHIBIT 3: CAL FIRE Map of Local Responsibility Area

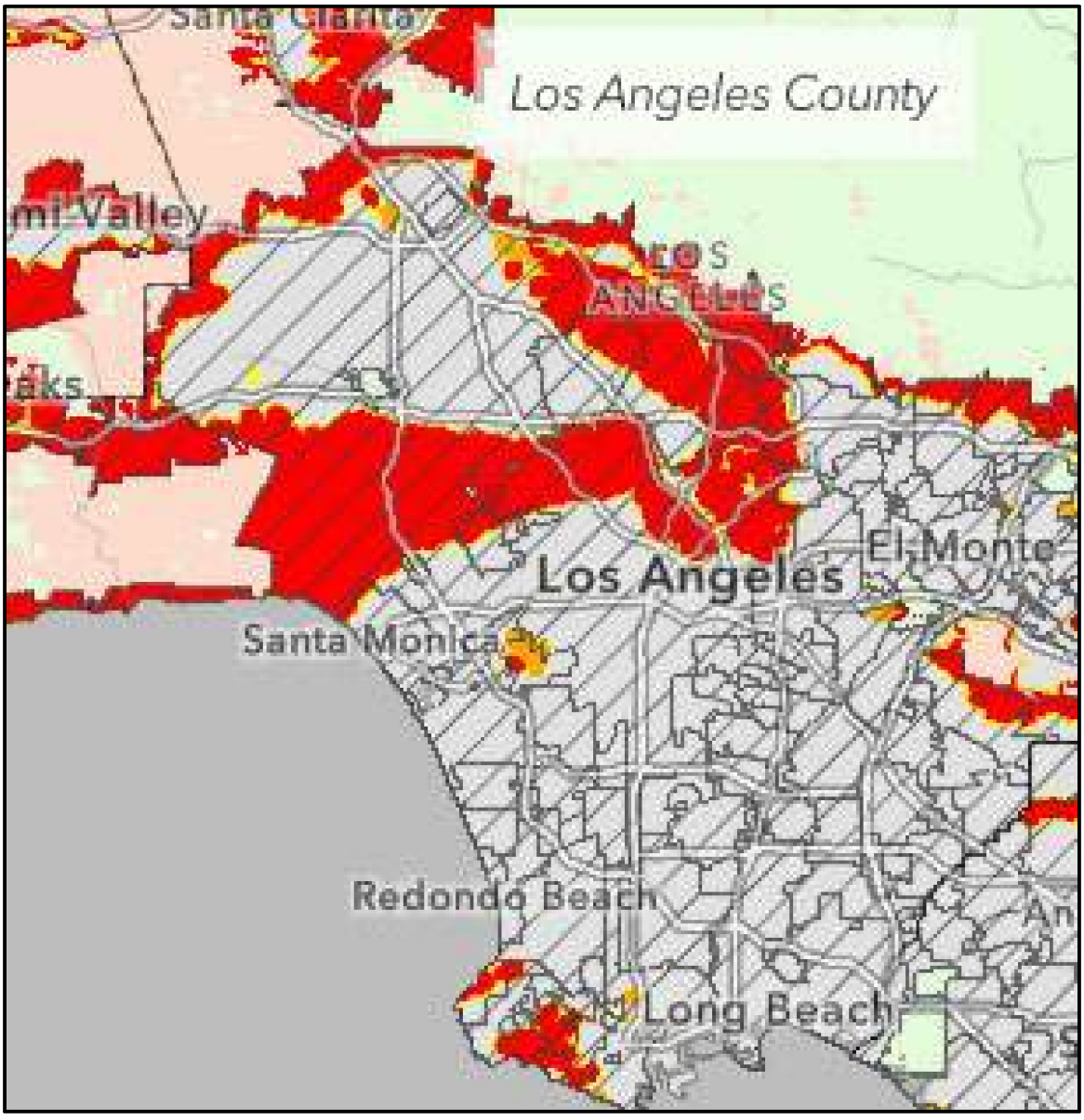


(Source: https://experience.arcgis.com/experience/6a9cb66bb1824cd98756812af41292a0)

Channel Law Group, LLP
8383 Wilshire Blvd., Suite 750
Beverly Hills, CA 90211

EXHIBIT 4

EXHIBIT 4: CAL FIRE Map of VHFHSZ

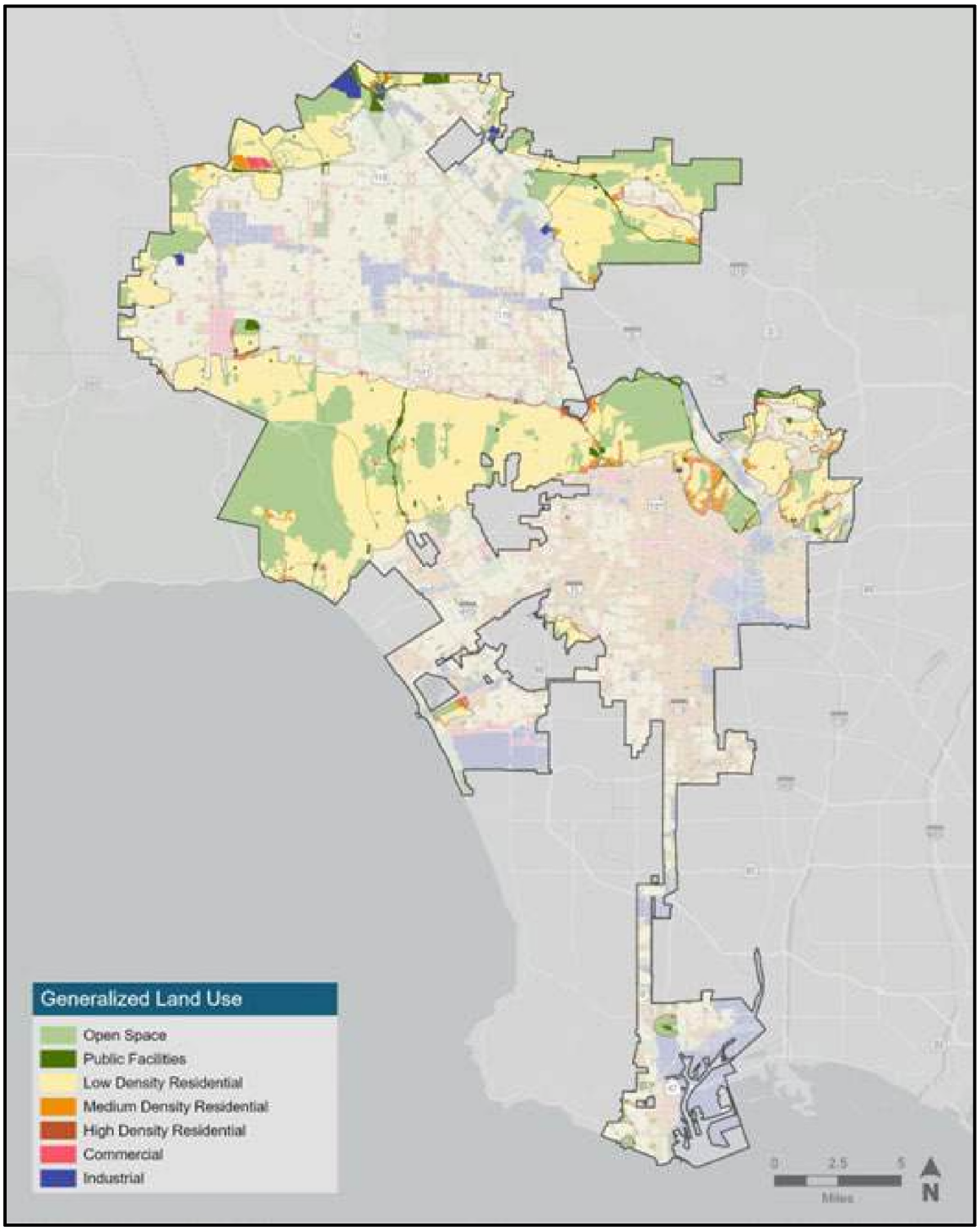


(Source: https://osfm.fire.ca.gov/what-we-do/community-wildfire-preparedness-and-mitigation/fire-hazard-severity-zones)

Channel Law Group, LLP
8383 Wilshire Blvd., Suite 750
Beverly Hills, CA 90211

EXHIBIT 5

EXHIBIT 5: Land Use Designation in City's VHFHSZ



(Source: https://planning.lacity.gov/odocument/c2e048eb-817c-4e9d-a550-57e33444621a/Safety_Element_CityofLosAngeles_SeptDraft.pdf)

Channel Law Group, LLP
8383 Wilshire Blvd., Suite 750
Beverly Hills, CA 90211

EXHIBIT 6

EXHIBIT 6: LIST OF CITY DEVELOPMENT APPROVALS IN VHFHSZ IN VIOLATION OF FIRE SAFE REGULATIONS

ADDRESS	DATE	CASE/PERMIT	VIOLATIONS
		Building Permits	
4621 N. Saltillo St.	2025-04-10 (Permit)	22010-20000-06584	Road width (§ 1273.01) Grade (§ 1273.03) Radius (§ 1273.04) Setbacks (§ 1276.01) Exceptions (§ 1270.07) Notice (§§ 1270.04, 1270.07) Conditions of approval (§ 1270.04(c))
1040 E. Montecito Dr.	2025-02-27 (Permit)	19010-20000-06154	Setbacks (§ 1276.01) Exceptions (§ 1270.07) Notice (§§ 1270.04, 1270.07) Conditions of approval (§ 1270.04(c))
3607 N. Kinney St.	2025-01-28 (Permit)	23010-20000-04215	Road width (§ 1273.01) Grade (§ 1273.03) Radius (§ 1273.04) Setbacks (§ 1276.01) Exceptions (§ 1270.07) Notice (§§ 1270.04, 1270.07) Conditions of approval (§ 1270.04(c))
10704 W. Art St.	2024-11-20 (Permit) 2025-02-14 (Permit)	22010-20000-05781 22010-20000-06065	Turnout (§ 1273.06) Gates (§ 1273.09) Setbacks (§ 1276.01) Exceptions (§ 1270.07) Notice (§§ 1270.04, 1270.07) Conditions of approval (§ 1270.04(c))

ADDRESS	DATE	CASE/PERMIT	VIOLATIONS
1030 N. Norman Pl.	2024-11-08 (Permit)	22010-20000-05350	Turnout (§ 1273.06) Gates (§ 1273.09) Setbacks (§ 1276.01) Exceptions (§ 1270.07) Notice (§§ 1270.04, 1270.07) Conditions of approval (§ 1270.04(c))
10231 N. Johanna Ave.	2024-09-26 (Permit)	23010-20000-02400	Gates (§ 1273.09) Setbacks (§ 1276.01) Exceptions (§ 1270.07) Notice (§§ 1270.04, 1270.07) Conditions of approval (§ 1270.04(c))
10606 W. Chalon Rd.	2024-09-17 (Permit)	23010-10000-03062	Gates (§ 1273.09) Setbacks (§ 1276.01) Exceptions (§ 1270.07) Notice (§§ 1270.04, 1270.07) Conditions of approval (§ 1270.04(c))
10091 McBroom St.	2024-04-05 (Permit)	20010-10000-02130	Turnout (§ 1273.06) Setbacks (§ 1276.01) Exceptions (§ 1270.07) Notice (§§ 1270.04, 1270.07) Conditions of approval (§ 1270.04(c))
10327 W. Siesta Dr.	2024-02-07 (Permit) 2024-08-23 (Cert. of Occ.)	23010-20000-02473	Road width with street parking (§ 1273.01) Dead-end length (§ 1273.08) Setbacks (§ 1276.01) Exceptions (§ 1270.07) Notice (§§ 1270.04, 1270.07) Conditions of approval (§ 1270.04(c))

ADDRESS	DATE	CASE/PERMIT	VIOLATIONS
4683 W. Glenalbyn Dr.	2023-12-06 (Permit)	19010-30000-05936	Road width (§ 1273.01) Grade (§ 1273.03) Setbacks (§ 1276.01) Exceptions (§ 1270.07) Notice (§§ 1270.04, 1270.07) Conditions of approval (§ 1270.04(c))
10850 W. Portofino Pl.	2023-09-27 (Permit)	23010-10000-01661	Road width with street parking (§ 1273.01) Setbacks (§ 1276.01) Exceptions (§ 1270.07) Notice (§§ 1270.04, 1270.07) Conditions of approval (§ 1270.04(c))
3005 N. Amethyst St.	2023-09-15 (Permit)	20010-10000-03895	Road width (§ 1273.01) Grade (§ 1273.03) Radius (§ 1273.04) Setbacks (§ 1276.01) Exceptions (§ 1270.07) Notice (§§ 1270.04, 1270.07) Conditions of approval (§ 1270.04(c))
3937 N. Brilliant Dr.	2023-07-27 (Permit) 2025-11-09 (Cert. of Occ.)	21010-10000-00583	Road width (§ 1273.01) Setbacks (§ 1276.01) Exceptions (§ 1270.07) Notice (§§ 1270.04, 1270.07) Conditions of approval (§ 1270.04(c))
1036 N. Norman Pl.	2023-06-29 (Permit)	22010-20000-05357	Gates (§ 1273.09) Setbacks (§ 1276.01) Exceptions (§ 1270.07) Notice (§§ 1270.04, 1270.07) Conditions of approval (§ 1270.04(c))

ADDRESS	DATE	CASE/PERMIT	VIOLATIONS
10690 Somma Way	2023-06-20 (Permit)	19010-20000-00272	Road width (§ 1273.01) Grade (§ 1273.03) Radius (§ 1273.04) Turnout (§ 1273.06) Dead-end length (§ 1273.08) Exceptions (§ 1270.07) Notice (§§ 1270.04, 1270.07) Conditions of approval (§ 1270.04(c))
1100 N. Chantilly Rd.	2023-06-14 (Permit)	18010-30000-04042	Road width with street parking (§ 1273.01) Setbacks (§ 1276.01) Exceptions (§ 1270.07) Notice (§§ 1270.04, 1270.07) Conditions of approval (§ 1270.04(c))
10401 Oletha Ln.	2023-05-22	18010-20000-05525	Road width (§ 1273.01) Grade (§ 1273.03) Turnaround (§ 1273.05) Setbacks (§ 1276.01) Exceptions (§ 1270.07) Notice (§§ 1270.04, 1270.07) Conditions of approval (§ 1270.04(c))
1201 N. Tower Grove Dr.	2023-03-31 (Permit)	21010-30000-06936	Grade (§ 1273.03) Radius (§ 1273.04) Gates (§ 1273.09) Setbacks (§ 1276.01) Exceptions (§ 1270.07) Notice (§§ 1270.04, 1270.07) Conditions of approval (§ 1270.04(c))

ADDRESS	DATE	CASE/PERMIT	VIOLATIONS
8441 W. Franklin Ave.	2023-02-23 (Permit)	17010-30000-00995	Road width with street parking (§ 1273.01) Grade (§ 1273.03) Setbacks (§ 1276.01) Exceptions (§ 1270.07) Notice (§§ 1270.04, 1270.07) Conditions of approval (§ 1270.04(c))
10651 N. Oakdale Ave.	2023-02-17 (Permit)	21010-10000-01755	Turnaround (§ 1273.05) Turnout (§ 1273.06) Dead-end length (§ 1273.08) Setbacks (§ 1276.01) Exceptions (§ 1270.07) Notice (§§ 1270.04, 1270.07) Conditions of approval (§ 1270.04(c))
10950 W. Verano Rd.	2022-12-20 (Permit) 2025-02-11 (Cert. of Occ.)	22010-20000-00742	Road width with street parking (§ 1273.01) Grade (§ 1273.03) Turnaround (§ 1273.05) Setbacks (§ 1276.01) Exceptions (§ 1270.07) Notice (§§ 1270.04, 1270.07) Conditions of approval (§ 1270.04(c))
1015 N. Dexter St.	2022-12-12 (Permit) 2025-02-02 (Cert. of Occ.)	22010-20000-00952	Road width with street parking (§ 1273.01) Setbacks (§ 1276.01) Exceptions (§ 1270.07) Notice (§§ 1270.04, 1270.07) Conditions of approval (§ 1270.04(c))
1056 N. Oban Dr.	2022-08-16 (Permit)	20010-10000-01943	Road width with street parking (§ 1273.01) Radius (§ 1273.04) Setbacks (§ 1276.01) Exceptions (§ 1270.07) Notice (§§ 1270.04, 1270.07) Conditions of approval (§ 1270.04(c))

ADDRESS	DATE	CASE/PERMIT	VIOLATIONS
1001 N. Linda Flora Dr.	2022-04-12 (Permit) 2024-12-26 (Cert. of Occ.)	19010-30000-04988	Road width with street parking (§ 1273.01) Dead-end length (§ 1273.08) Setbacks (§ 1276.01) Exceptions (§ 1270.07) Notice (§§ 1270.04, 1270.07) Conditions of approval (§ 1270.04(c))
20514 W. Overlook Ct.	2022-03-28 (Permit) 2023-04-20 (Cert. of Occ.)	21010-20000-01917	Dead-end length (§ 1273.08) Gates (§ 1273.09) Setbacks (§ 1276.01) Exceptions (§ 1270.07) Notice (§§ 1270.04, 1270.07) Conditions of approval (§ 1270.04(c))
1810 N. Old Orchard Rd.	2022-02-16 (Permit) 2024-04-22 (Cert. of Occ.)	21010-20000-03653	Road width (§ 1273.01) Turnaround (§ 1273.05) Gates (§ 1273.09) Setbacks (§ 1276.01) Exceptions (§ 1270.07) Notice (§§ 1270.04, 1270.07) Conditions of approval (§ 1270.04(c))
10052 W. Hillgrove Dr.	2022-02-08 (Permit) 2023-08-23 (Cert. of Occ.)	21010-20000-04053	Road width with street parking (§ 1273.01) Setbacks (§ 1276.01) Exceptions (§ 1270.07) Notice (§§ 1270.04, 1270.07) Conditions of approval (§ 1270.04(c))
1850 N. Upperton Ave.	2022-01-12 (Permit) 2023-10-11 (Cert. of Occ.)	19010-10000-03331	Grade (§ 1273.03) Turnaround (§ 1273.05) Dead-end length (§ 1273.08) Setbacks (§ 1276.01) Exceptions (§ 1270.07) Notice (§§ 1270.04, 1270.07) Conditions of approval (§ 1270.04(c))

ADDRESS	DATE	CASE/PERMIT	VIOLATIONS
10931 Bee Canyon Rd.	2021-09-22 (Permit)	20010-10000-02463	Driveway Structure (§ 1273.02) Setbacks (§ 1276.01) Exceptions (§ 1270.07) Notice (§§ 1270.04, 1270.07) Conditions of approval (§ 1270.04(c))
10580 W. Selkirk Ln.	2021-09-08 (Permit)	18010-20000-00280	Road width (§ 1273.01) Grade (§ 1273.03) Turnaround (§ 1273.05) Dead-end length (§ 1273.08) Setbacks (§ 1276.01) Exceptions (§ 1270.07) Notice (§§ 1270.04, 1270.07) Conditions of approval (§ 1270.04(c))
1367 N. Casiano Rd.	2021-07-29 (Permit) 2024-12-09 (Cert. of Occ.)	19010-10000-00266	Grade (§ 1273.03) Turnaround (§ 1273.05) Dead-end length (§ 1273.08) Setbacks (§ 1276.01) Exceptions (§ 1270.07) Notice (§§ 1270.04, 1270.07) Conditions of approval (§ 1270.04(c))
1669 N. Bruce Ct.	2021-07-23 (Permit) 2025-01-08 (Cert. of Occ.)	19010-10000-02094	Road width (§ 1273.01) Radius (§ 1273.04) Setbacks (§ 1276.01) Exceptions (§ 1270.07) Notice (§§ 1270.04, 1270.07) Conditions of approval (§ 1270.04(c))
1090 N. Moraga Dr.	2021-07-14 (Permit) 2024-12-23 (Cert. of Occ.)	20010-30000-04228	Dead-end length (§ 1273.08) Setbacks (§ 1276.01) Exceptions (§ 1270.07) Notice (§§ 1270.04, 1270.07) Conditions of approval (§ 1270.04(c))

ADDRESS	DATE	CASE/PERMIT	VIOLATIONS
Conditional Use Permits / Zoning Administrator Determinations			
3222 N. Amethyst St.	2025-08-25	ZA-2023-4071-ZAD-HCA	Road width (§ 1273.01) Setbacks (§ 1276.01) Exceptions (§ 1270.07) Notice (§§ 1270.04, 1270.07) Conditions of approval (§ 1270.04(c))
21140 N. Nofral Rd.	2025-06-17	ZA-2021-10333-ZAD	Road width (§ 1273.01) Grade (§ 1273.03) Setbacks (§ 1276.01) Exceptions (§ 1270.07) Notice (§§ 1270.04, 1270.07) Conditions of approval (§ 1270.04(c))
4215 W. Sea View Ln.	2025-05-19	ZA-2024-6221-CU1-SPPC-HCA	Road width (§ 1273.01) Grade (§ 1273.03) Radius (§ 1273.04) Turnaround (§ 1273.05) Dead-end length (§ 1273.08) Setbacks (§ 1276.01) Exceptions (§ 1270.07) Notice (§§ 1270.04, 1270.07) Conditions of approval (§ 1270.04(c))
9347 W. Wayside Dr.	2025-04-25	ZA-2023-8487-ZAD	Road width (§ 1273.01) Setbacks (§ 1276.01) Exceptions (§ 1270.07) Notice (§§ 1270.04, 1270.07) Conditions of approval (§ 1270.04(c))

ADDRESS	DATE	CASE/PERMIT	VIOLATIONS
1943 W. Escarpa Dr.	2025-03-28	ZA-2023-904-ZAD-HCA	Road width (§ 1273.01) Grade (§ 1273.03) Radius (§ 1273.04) Setbacks (§ 1276.01) Exceptions (§ 1270.07) Notice (§§ 1270.04, 1270.07) Conditions of approval (§ 1270.04(c))
3629 N. Kinney St.	2025-02-20	ZA-2024-1555-CU1-SPPC-HCA	Road width (§ 1273.01) Grade (§ 1273.03) Radius (§ 1273.04) Setbacks (§ 1276.01) Exceptions (§ 1270.07) Notice (§§ 1270.04, 1270.07) Conditions of approval (§ 1270.04(c))
3375 N. Blair Dr.	2025-02-03	ZA-2023-3802-ZAD-1A	Road width (§ 1273.01) Setbacks (§ 1276.01) Exceptions (§ 1270.07) Notice (§§ 1270.04, 1270.07) Conditions of approval (§ 1270.04(c))
2655 N. Outpost Dr.	2025-02-03	ZA-2023-6020-ZAD	Road width (§ 1273.01) Setbacks (§ 1276.01) Exceptions (§ 1270.07) Notice (§§ 1270.04, 1270.07) Conditions of approval (§ 1270.04(c))
4462 E. Cato St.	2025-01-31	ZA-2023-6531-ZAD-HCA	Road width (§ 1273.01) Grade (§ 1273.03) Setbacks (§ 1276.01) Exceptions (§ 1270.07) Notice (§§ 1270.04, 1270.07) Conditions of approval (§ 1270.04(c))

ADDRESS	DATE	CASE/PERMIT	VIOLATIONS
4392 E. West Rose Hill Dr.	2025-01-21	ZA-2024-305-ZAD-HCA	Road width (§ 1273.01) Grade (§ 1273.03) Radius (§ 1273.04) Setbacks (§ 1276.01) Exceptions (§ 1270.07) Notice (§§ 1270.04, 1270.07) Conditions of approval (§ 1270.04(c))
3011 N. Amethyst St.	2025-01-21	ZA-2023-2021-ZAD	Road width (§ 1273.01) Setbacks (§ 1276.01) Exceptions (§ 1270.07) Notice (§§ 1270.04, 1270.07) Conditions of approval (§ 1270.04(c))
9622 W. Green Verdugo Dr.	2024-12-24	ZA-2024-298-ZAD	Road width (§ 1273.01) Setbacks (§ 1276.01) Exceptions (§ 1270.07) Notice (§§ 1270.04, 1270.07) Conditions of approval (§ 1270.04(c))
4230 N. Saltillo St.	2024-12-19	ZA-2023-1206-ZAD-DRB-SPP-MSP-HCA	Road width (§ 1273.01) Grade (§ 1273.03) Radius (§ 1273.04) Setbacks (§ 1276.01) Exceptions (§ 1270.07) Notice (§§ 1270.04, 1270.07) Conditions of approval (§ 1270.04(c))
504 W. Ave. 44	2024-11-18	ZA-2022-7295-ZAA-ZAD-SPP-HCA	Road width (§ 1273.01) Grade (§ 1273.03) Radius (§ 1273.04) Setbacks (§ 1276.01) Exceptions (§ 1270.07) Notice (§§ 1270.04, 1270.07) Conditions of approval (§ 1270.04(c))

ADDRESS	DATE	CASE/PERMIT	VIOLATIONS
1480 N. Ave 57	2022-07-25	ZA-2020-1180-ZAA-ZAD	Road width (§ 1273.01) Grade (§ 1273.03) Radius (§ 1273.04) Setbacks (§ 1276.01) Exceptions (§ 1270.07) Notice (§§ 1270.04, 1270.07) Conditions of approval (§ 1270.04(c))
3005 N. Amethyst St.	2022-06-07	ZA-2020-781-ZAD-ZAA-1A	Road width (§ 1273.01) Grade (§ 1273.03) Radius (§ 1273.04) Setbacks (§ 1276.01) Exceptions (§ 1270.07) Notice (§§ 1270.04, 1270.07) Conditions of approval (§ 1270.04(c))
5011 E. La Calandria Dr.	2022-03-22	ZA-2020-1082-ZAD	Road width (§ 1273.01) Dead-end length (§ 1273.08) Setbacks (§ 1276.01) Exceptions (§ 1270.07) Notice (§§ 1270.04, 1270.07) Conditions of approval (§ 1270.04(c))
4567 E. Carter Dr.	2022-02-03	ZA-2020-2416-ZAD	Road width (§ 1273.01) Turnaround (§ 1273.05) Turnout (§ 1273.06) Dead-end length (§ 1273.08) Setbacks (§ 1276.01) Exceptions (§ 1270.07) Notice (§§ 1270.04, 1270.07) Conditions of approval (§ 1270.04(c))

ADDRESS	DATE	CASE/PERMIT	VIOLATIONS
3777 N. Sunswept Dr.	2021-10-14	ZA-2020-1362-ZAD-F	Road width (§ 1273.01) Radius (§ 1273.04) Setbacks (§ 1276.01) Exceptions (§ 1270.07) Notice (§§ 1270.04, 1270.07) Conditions of approval (§ 1270.04(c))
3076 N. Beckman Rd.	2021-10-13	ZA-2020-1261-ZV-ZAD-1A	Road width (§ 1273.01) Grade (§ 1273.03) Radius (§ 1273.04) Turnaround (§ 1273.05) Dead-end length (§ 1273.08) Gates (§ 1273.09) Setbacks (§ 1276.01) Exceptions (§ 1270.07) Notice (§§ 1270.04, 1270.07) Conditions of approval (§ 1270.04(c))
3624 N. Montalvo St.	2021-09-28	ZA-2020-630-ZAD-SPP	Road width (§ 1273.01) Grade (§ 1273.03) Radius (§ 1273.04) Setbacks (§ 1276.01) Exceptions (§ 1270.07) Notice (§§ 1270.04, 1270.07) Conditions of approval (§ 1270.04(c))
4683 W. Glenalbyn Dr.	2021-08-20	ZA-2020-4067-ZAD-SPP-HCA	Road width (§ 1273.01) Grade (§ 1273.03) Setbacks (§ 1276.01) Exceptions (§ 1270.07) Notice (§§ 1270.04, 1270.07) Conditions of approval (§ 1270.04(c))

ADDRESS	DATE	CASE/PERMIT	VIOLATIONS
598 N. Cross Ave.	2021-07-05	ZA-2020-1233-ZAD-SPP	Road width (§ 1273.01) Radius (§ 1273.04) Turnaround (§ 1273.05) Dead-end length (§ 1273.08) Setbacks (§ 1276.01) Exceptions (§ 1270.07) Notice (§§ 1270.04, 1270.07) Conditions of approval (§ 1270.04(c))

ADDRESS	DATE	CASE/PERMIT	VIOLATIONS
		"B" Permits	
749 N. Crane Blvd.	2025-04-30	BR005099	Road width with street parking (§ 1273.01) Turnaround (§ 1273.05) Exceptions (§ 1270.07) Notice (§§ 1270.04, 1270.07) Conditions of approval (§ 1270.04(c))
23937 W. Jensen Dr.	2025-03-12	BR206343	Road width with street parking (§ 1273.01) Exceptions (§ 1270.07) Notice (§§ 1270.04, 1270.07) Conditions of approval (§ 1270.04(c))
17619 W. Rinaldi St.	2025-03-11	BR206342	Turnaround (§ 1273.05) Exceptions (§ 1270.07) Notice (§§ 1270.04, 1270.07) Conditions of approval (§ 1270.04(c))
5752 W. Valley Oak Dr.	2025-02-25	BR005088	Turnaround (§ 1273.05) Exceptions (§ 1270.07) Notice (§§ 1270.04, 1270.07) Conditions of approval (§ 1270.04(c))
5817 Weaver St.	2025-02-06	BR005083	Road width with street parking (§ 1273.01) Grade (§ 1273.03) Exceptions (§ 1270.07) Notice (§§ 1270.04, 1270.07) Conditions of approval (§ 1270.04(c))
4172 N. Rosario Rd.	2025-01-29	BR206332	Radius (§ 1273.04) Grade (§ 1273.03) Exceptions (§ 1270.07) Notice (§§ 1270.04, 1270.07) Conditions of approval (§ 1270.04(c))

ADDRESS	DATE	CASE/PERMIT	VIOLATIONS
4252 N. Alhama Dr.	2025-01-29	BR206334	Road width (§ 1273.01) Exceptions (§ 1270.07) Notice (§§ 1270.04, 1270.07) Conditions of approval (§ 1270.04(c))
1657 N. Burnell Dr.	2025-01-07	BR005078	Road width (§ 1273.01) Turnaround (§ 1273.05) Exceptions (§ 1270.07) Notice (§§ 1270.04, 1270.07) Conditions of approval (§ 1270.04(c))
2046 N. Avon St.	2025-01-07	BR005075	Road width (§ 1273.01) Radius (§ 1273.04) Grade (§ 1273.03) Exceptions (§ 1270.07) Notice (§§ 1270.04, 1270.07) Conditions of approval (§ 1270.04(c))
10701 E. Levico Way	2024-11-25	BR403234	Road width (§ 1273.01) Grade (§ 1273.03) Turnaround (§ 1273.05) Turnout (§ 1273.06) Exceptions (§ 1270.07) Notice (§§ 1270.04, 1270.07) Conditions of approval (§ 1270.04(c))
2834 N. Thomas St.	2024-11-14	BR005066	Road width (§ 1273.01) Grade (§ 1273.03) Radius (§ 1273.04) Turnaround (§ 1273.05) Exceptions (§ 1270.07) Notice (§§ 1270.04, 1270.07) Conditions of approval (§ 1270.04(c))

ADDRESS	DATE	CASE/PERMIT	VIOLATIONS
1938 N. Phillips Way	2024-11-14	BR005067	Road width (§ 1273.01) Turnaround (§ 1273.05) Exceptions (§ 1270.07) Notice (§§ 1270.04, 1270.07) Conditions of approval (§ 1270.04(c))
1201 N. Tower Grove Dr.	2024-11-08	BR403230	Grade (§ 1273.03) Radius (§ 1273.04) Gates (§ 1273.09) Setbacks (§ 1276.01) Exceptions (§ 1270.07) Notice (§§ 1270.04, 1270.07) Conditions of approval (§ 1270.04(c))

ADDRESS	DATE	CASE/PERMIT	VIOLATIONS
Tentative Tract or Parcel Maps			
2359 N. Yorkshire Dr.	2024-04-26	AA-2021-8380-PMLA	Road width (§ 1273.01) Grade (§ 1273.03) Setbacks (§ 1276.01) Exceptions (§ 1270.07) Notice (§§ 1270.04, 1270.07) Findings (LAMC § 4908.2) Conditions of approval (§ 1270.04(c))
11200 W. Dona Lola Dr.	2024-01-08	AA-2023-1386-PMLA-HCA	Setbacks (§ 1276.01) Exceptions (§ 1270.07) Notice (§§ 1270.04, 1270.07) Findings (LAMC § 4908.2) Conditions of approval (§ 1270.04(c))
2555 W. Ivan Hill Terr.	2022-07-27	AA-2021-8617-PMLA-SL-HCA	Turnaround (§ 1273.05) Setbacks (§ 1276.01) Exceptions (§ 1270.07) Notice (§§ 1270.04, 1270.07) Findings (LAMC § 4908.2) Conditions of approval (§ 1270.04(c))
2820 N. Avenel St.	2021-10-12	VTT-82658-SL	Setbacks (§ 1276.01) Exceptions (§ 1270.07) Notice (§§ 1270.04, 1270.07) Findings (LAMC § 4908.2) Conditions of approval (§ 1270.04(c))

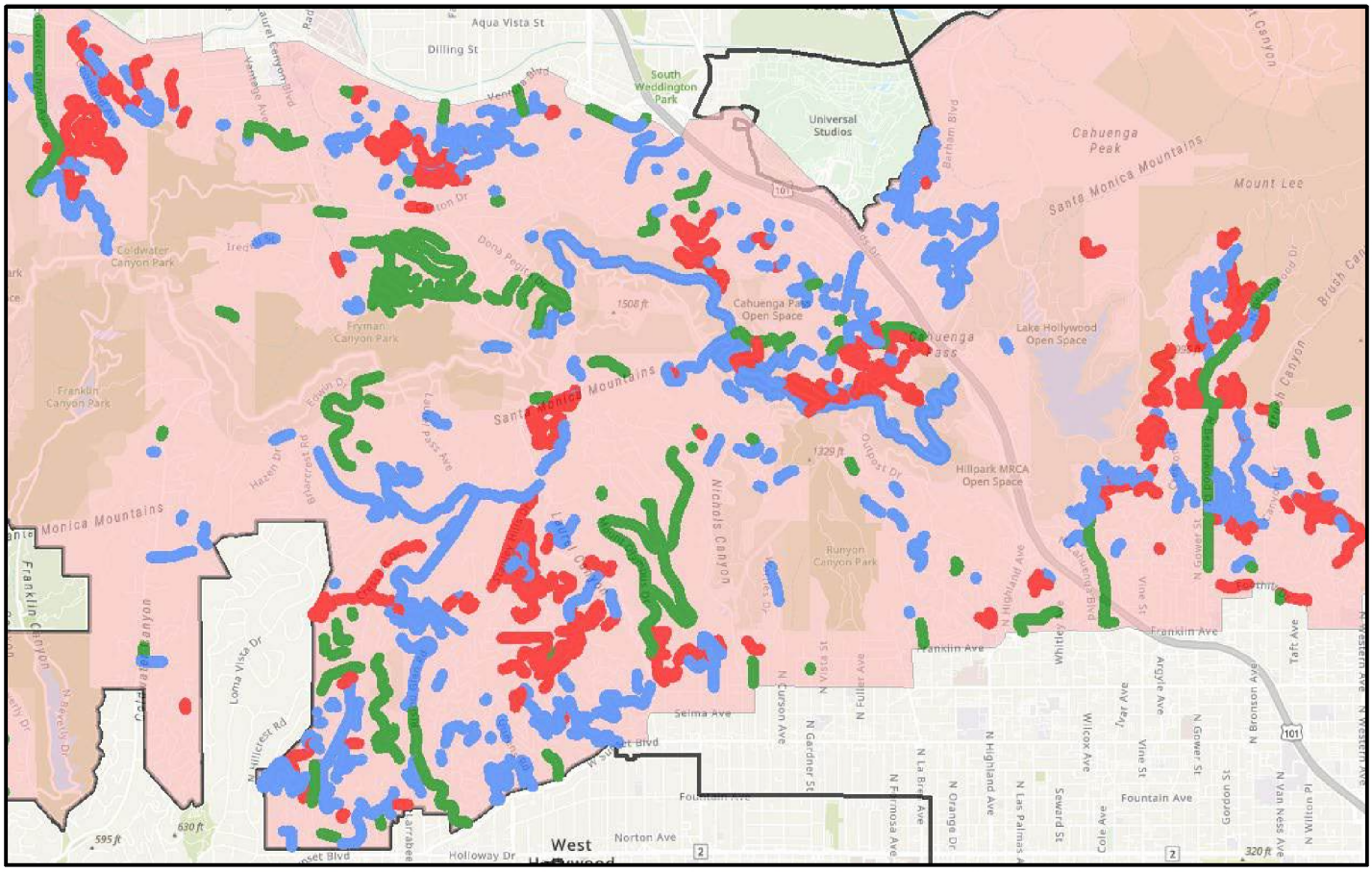
ADDRESS	DATE	CASE/PERMIT	VIOLATIONS
3031 W. Angus St.	2024-12-06	ZA-2022-8857-ZAD-ZAA-HCA	Road width (§ 1273.01) Radius (§ 1273.04) Turnout (§ 1273.06) Dead-end length (§ 1273.08) Setbacks (§ 1276.01) Exceptions (§ 1270.07) Notice (§§ 1270.04, 1270.07) Findings (LAMC § 4908.2) Conditions of approval (§ 1270.04(c))

ADDRESS	DATE	CASE/PERMIT	VIOLATIONS
		Private Streets	
12165 N. Highwater Rd.	2025-05-20	PS-1467	Road width (§ 1273.01) Exceptions (§ 1270.07) Notice (§§ 1270.04, 1270.07) Conditions of approval (§ 1270.04(c))

Channel Law Group, LLP
8383 Wilshire Blvd., Suite 750
Beverly Hills, CA 90211

EXHIBIT 7

EXHIBIT 7: Map of Street Widths in Hollywood Hills



(Legend: **Red**: width less than 20 feet; **Blue**: width between 20 and 28 feet; **Green**: width over 28 feet.)

(Source: https://navigatela.lacity.org/navigatela/)

Channel Law Group, LLP
8383 Wilshire Blvd., Suite 750
Beverly Hills, CA 90211

EXHIBIT 8

December 1, 2025 Project Number 25-03

Attention: Jamie Hall
Channel Law Group
8383 Wilshire Boulevard, Suite 750
Beverly Hills, CA 90211

SUBJECT: State Minimum Fire Safe Regulations Ingress and Egress Requirements and 4320 Saltillo Street

Dear Mr. Hall,

Pursuant to your request, I have performed a field investigation of roadway access to the proposed development project at 4320 Saltillo Street ("Project") with respect to the State Minimum Fire Safe Regulations ("Regulations"), specifically as they pertain to Article 2, Ingress and Egress, and Los Angeles Municipal Code ("LAMC") Section 57.4908 and document any deficiencies. This report presents the findings of my investigation.

EXECUTIVE SUMMARY

The Project is located in the central region of the City of Los Angeles ("City") in the San Fernando Valley. Channel Law Group has hired Brandon Araujo, a professional Civil Engineer registered in the State of California, to conduct a field investigation of roadway access to the Project and prepare a report as to whether roadway access meets the requirements as set forth in California Code of Regulations, Title 14 Natural Resources, Division 1.5 – Department of Forestry and Fire Protection, Chapter 7 – Fire Protection, Subchapter 2 – State Minimum Fire Safe Regulations, Article 2 – Ingress and Egress and incorporated in LAMC Section 57.4908.

Upon completion of his field investigation, Mr. Araujo determined that roadway access to the Project does not meet the Regulations with respect to width and grade and, as such, the Project does not comply with the LAMC Section 57.4908.

See **Exhibit 1, Overview of Roadway Deficiencies,** for an overview of the deficiencies documented in this report. This exhibit, and all other exhibits referenced in this report, can be found in **Attachment 1**.

BACKGROUND

The Project (APN 2172-023-053) is located in the San Fernando Valley region of the City. See **Exhibit 1** for an overview of the location of Project. The Project is located in a designated Very High Fire Hazard Severity Zone.

Channel Law Group hired Brandon Araujo, P.E. to conduct a field investigation and evaluate access to the Project with respect to Article 2, Ingress and Egress, of the Regulations and document any instances where roadway access did not meet the standards set forth therein. The text of the Regulations, as provided by the State of California's Office of Administrative Law, can be found in **Attachment 2**.

PROFESSIONAL CREDENTIALS

Mr. Araujo is a professional Civil Engineer registered in the State of California and has been licensed since January 2010. He has extensive experience reviewing street improvement plans prepared for the public right-of-way and evaluating them based on established standards. He also has extensive experience performing field investigations of public roadway facilities to document existing roadway geometric and/or traffic deficiencies and verifying their compliance with approved plans or established standards. See **Attachment 3** for his resume.

METHODOLOGY

Mr. Araujo conducted a field investigation in a manner consistent with the level of care and skill exercised by members of his profession currently practicing under similar conditions in the Southern California area. His investigation took place on Saturday, April 12, 2025 and Sunday, November 23, 2025. Distances less than 25 feet were measured with a measuring tape, distances greater than 25 feet were measured with a measuring wheel along the ground, and grades were measured with a digital level. Per Section 1270.08, Distance Measurements, of the Regulations "all specified or referenced distances are measured along the ground, unless otherwise stated." Mr. Araujo evaluated six access routes to the Project with respect to the Regulations:

1) Southbound Saltillo Street via Canoga Avenue
2) Southbound Saltillo Street via Rios Street
3) Southbound Saltillo Street via Castillo Street
4) Las Pilas Road via Castillo Street
5) Northbound Saltillo Street via Golondrina Street
6) Northbound Saltillo Street via Mulholland Drive

See **Exhibit 2** for an overview of each access route evaluated.

FINDINGS

Existing Conditions

Below you will find a summary of each of the existing conditions of the roads evaluated in the access routes listed above. Mr. Araujo observed low traffic volumes traveling in both directions of travel at speeds varying from 10 to 25 miles per hour. Unless otherwise noted, all roads are paved with asphalt concrete and serve motor vehicles driving to and from single family residential homes.

Saltillo Street

Saltillo Street's northern terminus is located at the intersection of Canoga Avenue and Saltillo Street. Saltillo Street's southern terminus is located at the intersection of Mulholland Drive and Saltillo Street.

The segment of Saltillo Street from Canoga Avenue to Rios Street ("Segment 1") measures approximately 860 feet long. Saltillo Street lacks curb and gutter along this segment on both sides of the road. Its width, as measured from edge of pavement to edge of pavement, varies from 12 feet and 6 inches to 19 feet. There are no regulatory signs installed prohibiting stopping or parking facing southbound traffic. No Parking Any Time signs are installed facing northbound traffic along the northern portion of this roadway approaching Canoga Avenue.

The segment of Saltillo Street from Rios Street to Castillo Street ("Segment 2") measures approximately 840 feet long. While much of Saltillo Street along this segment lacks curb and gutter on both sides of the road, some properties do feature curb and gutter along their frontages (e.g. 4372 Saltillo Street, 4378 Saltillo Street, etc.) Its width, as measured from edge of pavement to edge of pavement or from curb face to curb face, if applicable, is approximately 20 feet. There are no regulatory signs installed prohibiting stopping or parking in the southbound direction. No Parking Any Time signs are installed facing northbound traffic along this entire segment of Saltillo Street.

The segment of Saltillo Street from Castillo Street to Las Pilas Road ("Segment 3") measures approximately 590 feet long. It features asphalt curbs on both sides of the road aside from the frontage along 4320 Saltillo Street which lacks an asphalt curb. Its width, as measured from curb face to curb face, is approximately 20 feet. There are no regulatory signs installed prohibiting stopping or parking in either the south- or northbound directions.

The segment of Saltillo Street from Las Pilas Road to Golondrina Street ("Segment 4") measures approximately 250 feet long. It lacks curb and gutter on both sides of the road. Its width, as measured from edge of pavement to edge of pavement varies from 14 feet to 16 feet and 8 inches. No Parking Any Time signs are installed facing traffic in both the south- or northbound directions.

The segment of Saltillo Street from Golondrina Street to Escondido Street (North) ("Segment 5"), measures approximately 520 feet long. It lacks curb and gutter on both sides of the road. Its width, as measured from curb face to curb face, varies from 16 feet to 20 feet. No Parking signs are installed facing southbound traffic along this entire segment. There are no regulatory signs installed prohibiting stopping or parking in the northbound direction.

The segment of Saltillo Street from Escondido Street (North) to Mulholland Drive ("Segment 6"), measures approximately 750 feet long. It features curb on gutter on both sides of the road. Its width, as measured from curb face to curb face, is approximately 24 feet. There are no regulatory signs installed prohibiting stopping or parking in either the south- or northbound directions.

Rios Street

Rios Street's western terminus is located at the intersection of Canoga Avenue and Rios Street. Rios Street's eastern terminus is located at the intersection of Rios Street and Saltillo Street.

Rios Street lacks a gutter along much of its length on both sides of the road. Its width, as measured from curb face to curb face, measures less than 24 feet. There are no regulatory signs installed prohibiting stopping or parking facing eastbound traffic. No Parking Any Time signs are installed facing westbound traffic.

Castillo Street

Castillo Street's western terminus is located at the intersection of Canoga Avenue and Castillo Street. Castillo Street's eastern terminus is located at the intersection of Castillo Street and Saltillo Street.

Castillo Street lacks a gutter along much of its length on both sides of the road. Its width, as measured from curb face to curb face, measures approximately 20 feet. No Parking Any Time signs are installed facing eastbound traffic. There are no regulatory signs installed prohibiting stopping or parking facing westbound traffic.

Las Pilas Road

Las Pilas Road's western terminus is located at the intersection of Castillo Street and Las Pilas Road. Las Pilas Road's eastern terminus is located at the intersection of Las Pilas Road and Saltillo Street.

Las Pilas Road lacks a gutter along much of its length on both sides of the road. Its width, as measured from curb face to curb face, measures 16 to 18 feet. No Parking Any Time signs are installed facing both directions of traffic.

Golondrina Street, from Canoga Avenue to Saltillo Street

This segment of Golondrina Street's western terminus is located at the intersection of Canoga Avenue and Golondrina Street. The eastern terminus of this segment is located at the intersection of Golondrina Street and Saltillo Street.

Golondrina Street, from Canoga Avenue to Saltillo Street, lacks a gutter along much of its length on both sides of the road. Its width, as measured from curb face to curb face, measures approximately 18 feet. No Parking Any Time signs are installed facing both directions of traffic.

Facility Determinations

Article 2 of the Regulations refers to three different types of facilities: driveways, one-way roads, and two-way roads.

Section 1270.01(i) of the Regulations defines a "driveway" as follows: "A vehicular pathway that serves no more than four (4) Residential Units and any number of non-commercial or non-industrial Utility or Miscellaneous Group U Buildings on each parcel. A Driveway shall not serve commercial or industrial uses at any size or scale." A "road," on the other hand, is defined in Section 1270.01(y) as follows: "A public or private vehicular pathway to more than four (4) Residential Units, or to any industrial or commercial Occupancy."

Since the five roadways evaluated (i.e. Saltillo Street, Rios Street, Castillo Street, Las Pilas Road, and Golondrina Street) are public vehicular pathways to more than four (4) Residential Units based on my personal observations and review of the number of homes utilizing the City's Zone Information and Map Access System ("ZIMAS"), they cannot be considered driveways as defined by the Regulations.

For all five roadways evaluated, traffic control signs are installed facing both directions of traffic consistent with a two-way road. In addition, since there are no traffic signs nor pavement

markings nor physical barriers prohibiting or discouraging motor vehicle travel in either direction, none of the five roadways can be considered a one-way road.

Since all five roadways are public vehicular pathways to more than four residential units and serve traffic in the both directions, each was evaluated based on the Regulations' requirements for a two-way road.

Types of Deficiencies

In my evaluation, I found two types of deficiencies: deficiencies with respect to the Regulations' requirements for road width and road grade. The requirements for a two-way road are found in Section 1273.01(a) of the Regulations. Section 1273.01(a) states:

> All roads shall be constructed to provide a minimum of two ten (10) foot traffic lanes, not including shoulder and striping. These traffic lanes shall provide for two-way traffic flow to support emergency vehicle and civilian egress, unless other standards are provided in this article or additional requirements are mandated by Local Jurisdictions or local subdivision requirements.

The requirements for grade are found in Section 1273.03 of the Regulations. Section 1273.03 states:

> (a) At no point shall the grade for all Roads and Driveways exceed 16 percent.
> (b) The grade may exceed 16%, not to exceed 20%, with approval from the Local Jurisdiction and with mitigations to provide for Same Practical Effect.[1]"

//

//

//

//

[1] Same Practical Effect is defined in Section 1270.1 of the Regulations:

> As used in this subchapter, means an Exception or alternative with the capability of applying accepted wildland fire suppression strategies and tactics, and provisions for fire fighter safety, including:
> (1) access for emergency wildland fire equipment,
> (2) safe civilian evacuation,
> (3) signing that avoids delays in emergency equipment response,
> (4) available and accessible water to effectively attack Wildfire or defend a Structure from Wildfire, and
> (5) fuel modification sufficient for civilian and fire fighter safety.

ACCESS ROUTE DEFICIENCIES

Access Route 1: Southbound Saltillo Street via Canoga Avenue

Segment 1 of Saltillo Street varies in width from 12 and a half feet to 16 and a half feet. The amount of width provided along this segment is less than the 20 feet required. See **Exhibit 3.1** for a photograph of this segment of Saltillo Street looking westward.

Segment 2 of Saltillo Street measures approximately 20 feet in width. However, parking is permitted in the southbound direction. The presence of parked vehicles reduces the available road width to traffic by 8 feet. Hence, the amount of width provided along this segment is less than the 20 feet required. See **Exhibit 3.2** for a photograph of this segment of Saltillo Street looking southward.

Segment 3 of Saltillo Street measures approximately 20 feet in width. However, parking is permitted in the both the south- and northbound directions. The presence of parked vehicles reduces the available road width to traffic by 8 feet. Hence, the amount of width provided along this segment is less than the 20 feet required. See **Exhibit 3.3** for a photograph of this segment of Saltillo Street looking southward.

Since this access route does not provide a minimum of two ten (10) foot traffic lanes that provide for two-way traffic flow to support emergency vehicle and civilian egress, this access route does not meet the Regulations' requirements with respect to width and, consequently, does not comply with LAMC Section 57.4908.

Access Route 2: Southbound Saltillo Street via Rios Street

As stated above, while Segments 2 and 3 of Saltillo Street measure approximately 20 feet in width, the presence of parked vehicles along either of these segments reduces the available roadway by 8 feet.

Rios Street measures approximately 24 feet in width. However, parking is permitted in the eastbound direction of travel (along the south side of the road). The presence of parked vehicles reduces the available road width to traffic by 8 feet. Hence, the amount of width provided along Rios Street is less than the 20 feet required. See **Exhibit 3.4** for a photograph of this segment of Rios Street looking westward.

Since this access route does not provide a minimum of two ten (10) foot traffic lanes that provide for two-way traffic flow to support emergency vehicle and civilian egress, this access route does

not meet the Regulations' requirements with respect to width and, consequently, does not comply with LAMC Section 57.4908.

Access Route 3: Southbound Saltillo Street via Castillo Street

As stated under Access Route 1, while Segment 3 of Saltillo Street measure approximately 20 feet in width, the presence of parked vehicles reduces the available roadway by 8 feet.

Castillo Street measures approximately 20 feet in width. However, parking is permitted in the westbound direction of travel (along the north side of the road). The presence of parked vehicles reduces the available road width to traffic by 8 feet. Hence, the amount of width provided along Castillo Street is less than the 20 feet required. See **Exhibit 3.5** for a photograph of this segment of Castillo Street looking westward.

Since this access route does not provide a minimum of two ten (10) foot traffic lanes that provide for two-way traffic flow to support emergency vehicle and civilian egress, this access route does not meet the Regulations' requirements with respect to width and, consequently, does not comply with LAMC Section 57.4908

Access Route 4: Las Pilas Road via Castillo Street

Las Pilas Road varies in width from 16 feet to 18 feet. The amount of width provided along this segment is less than the 20 feet required. See **Exhibit 3.6** for a photograph of Las Pilas Road looking westward.

Furthermore, during the field investigation, Las Pilas Road was found to have a grade in excess of 16 percent at two locations: one location is found near the intersection of Las Pilas Road and Castillo Street, the second location is found in front of 21318 Las Pilas Road. Photographs showing the grade in excess of 16 percent at these locations are provided in **Exhibits 3.7** and **3.8**, respectively.

Since Las Pilas Road does not provide a minimum of two ten (10) foot traffic lanes that provide for two-way traffic flow to support emergency vehicle and civilian egress and its grade exceeds the 16 percent without any evidence of the City providing mitigation for Same Practical Effect, this access route does not meet the Regulations' requirements with respect to width and grade and, consequently, does not comply with LAMC Section 57.4908

Access Route 5: Northbound Saltillo Street via Golondrina Street

Segment 4 of Saltillo Street varies in width from 14 feet to 18 feet. The amount of width provided along this segment is less than the 20 feet required. See **Exhibit 3.9** for a photograph of this segment of Saltillo Street looking southward.

Golondrina Street measures approximately 18 feet in width. The amount of width provided along this segment is less than the 20 feet required. See **Exhibit 3.10** for a photograph of Golondrina Street looking eastward.

Since this access route does not provide a minimum of two ten (10) foot traffic lanes that provide for two-way traffic flow to support emergency vehicle and civilian egress, this access route does not meet the Regulations' requirements with respect to width and, consequently, does not comply with LAMC Section 57.4908.

Access Route 6: Northbound Saltillo Street via Mulholland Drive

Segment 6 of Saltillo Street measures approximately 24 feet in width. However, parking is permitted in the both the north- and southbound directions. The presence of parked vehicles reduces the available road width to traffic by 8 feet. Hence, the amount of width provided along this segment is less than the 20 feet required. See **Exhibit 3.11** for a photograph of this segment of Saltillo Street looking southbound.

Segment 5 of Saltillo Street measures up to 20 feet in width. The frontage in front of 4170 Saltillo Street is approximately 16 feet wide. See **Exhibit 3.12** for a photograph of Saltillo Street in front of 4170 Saltillo Street looking southward. The remainder of Segment 5 north of 4170 Saltillo Street is approximately 20 feet wide, but the presence of parking reduces the amount of width provided along this segment to less than the 20 feet required.

Since this access route does not provide a minimum of two ten (10) foot traffic lanes that provide for two-way traffic flow to support emergency vehicle and civilian egress, this access route does not meet the Regulations' requirements with respect to width and, consequently, does not comply with LAMC Section 57.4908.

//

//

//

CONCLUSION

Access to the Project does not comply with the State Minimum Fire Safe Regulations as they pertain to Article 2, Ingress and Egress.

Specifically, access to the Project via southbound Saltillo Street via Canoga Avenue does not comply since the width of Segment 1 of Saltillo Street is less than 20 feet and the presence of parking on Segments 2 and 3 limits the width of roadway dedicated to two-way traffic flow to less than 20 feet.

Access to the Project via southbound Saltillo Street via Rios Street does not comply since the presence of parking on Saltillo Street and Rios Street limits the width of the roadway dedicated to two-way traffic flow to less than 20 feet.

Access to the Project via southbound Saltillo Street via Castillo Street does not comply since the presence of parking on Saltillo Street and Castillo Street limits the width of the roadway dedicated to two-way traffic flow to less than 20 feet.

Access to the Project via Las Pilas Road via Castillo Street does not comply since the presence of parking on Castillo Street limits the width of the roadway dedicated to two-way traffic flow to less than 20 feet, the width of Las Pilas Road is less than 20 feet, and the grade of Las Pilas Road exceeds 16 percent in multiple locations without any evidence of the City providing mitigations to provide for Same Practical Effect

Access to the Project via northbound Saltillo Street via Golondrina Street does not comply since the width of Golondrina Street is less than 20 feet and the width of a segment of Saltillo Street south of the project is less than 20 feet.

Access to the Project via northbound Saltillo Street via Mulholland Drive does not comply with the Regulations since multiple segments of Saltillo Street north of Escondido Street (North) have a width of less than 20 feet and the presence of parking on Saltillo Street from Escondido Street (North) to Mulholland Drive limits the width of the roadway dedicated to two-way traffic flow to less than 20 feet.

Each of the six routes to the Project do not meet the Regulations requirements with respect to Ingress and Egress. Moreover, I have reviewed the Letter of Determination issued by the City on December 19, 2024, and do not see any special conditions imposed by the City to provide the "Same Practical Effect" as defined in Section 1270.1 of the Regulations. Therefore, access to the Project does not comply with the Regulations and, consequently, the Project does not comply with LAMC Section 57.4908.

If you have any further questions, please let me know.

Sincerely,



Brandon Araujo, P.E.
R.C.E 75996

Attachments

1) Exhibits
2) State Minimum Fire Safe Regulations, Article 2, Ingress and Egress
3) Brandon Araujo's Resume

ATTACHMENT 1

EXHIBITS

Exhibit 1

Overview of Roadway Deficiencies

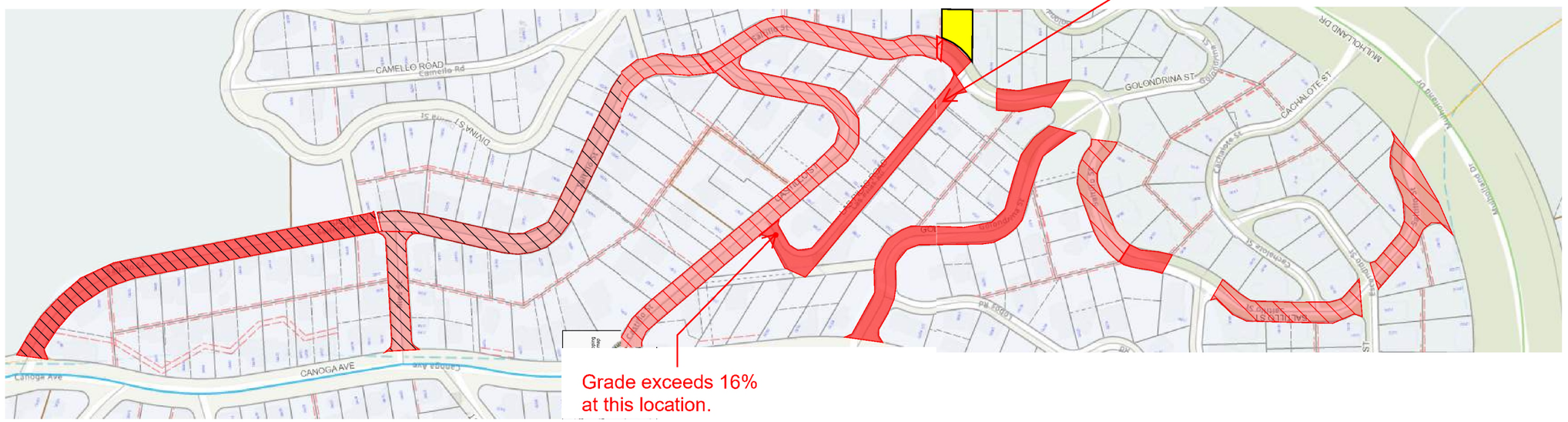


Exhibit 1 - Overview of Roadway Deficiencies

Exhibit 2

Overview of Access Routes

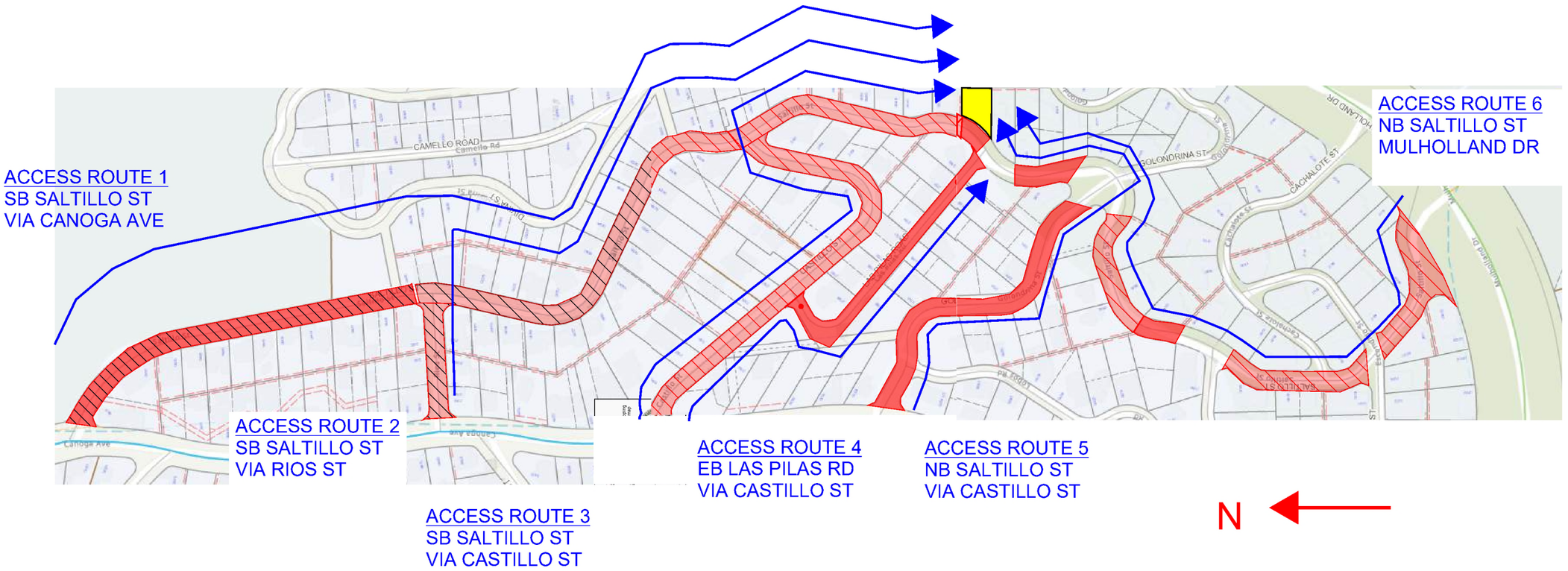


Exhibit 2 - Overview of Access Routes

Exhibit 3.1

Photograph of Saltillo Street – Segment 1 Looking Westward



Exhibit 3.1: Photograph of Saltillo Street – Segment 1 Looking Westward

Exhibit 3.2

Photograph of Saltillo Street – Segment 2 Looking Southward



Exhibit 3.2: Photograph of Saltillo Street – Segment 2 Looking Southward

Exhibit 3.3

Photograph of Saltillo Street – Segment 3 Looking Southward



Exhibit 3.3: Photograph of Saltillo Street – Segment 3 Looking Southward

Exhibit 3.4

Photograph of Rios Street Looking Westward



Exhibit 3.4: Photograph of Rios Street Looking Westward

Exhibit 3.5

Photograph of Castillo Street Looking Westward



Exhibit 3.5: Photograph of Castillo Street Looking Westward

Exhibit 3.6

Photograph of Las Pilas Road Looking Westward



Exhibit 3.6: Photograph of Las Pilas Road Looking Westward

Exhibit 3.7

Photograph of Digital Level on Las Pilas Road Near Its Intersection with Castillo Street



Exhibit 3.7: Photograph of Digital Level on Las Pilas Road Near Its Intersection with Castillo Street

Exhibit 3.8

Photograph of Digital Level In Front of 21318 Las Pilas Road



Exhibit 3.8: Photograph of Digital Level In Front of 21318 Las Pilas Road

Exhibit 3.9

Photograph of Saltillo Street - Segment 4 Looking Southward



Exhibit 3.9: Photograph of Saltillo Street – Segment 4 Looking Southward

Exhibit 3.10

Photograph of Golondrina Street Looking Eastward

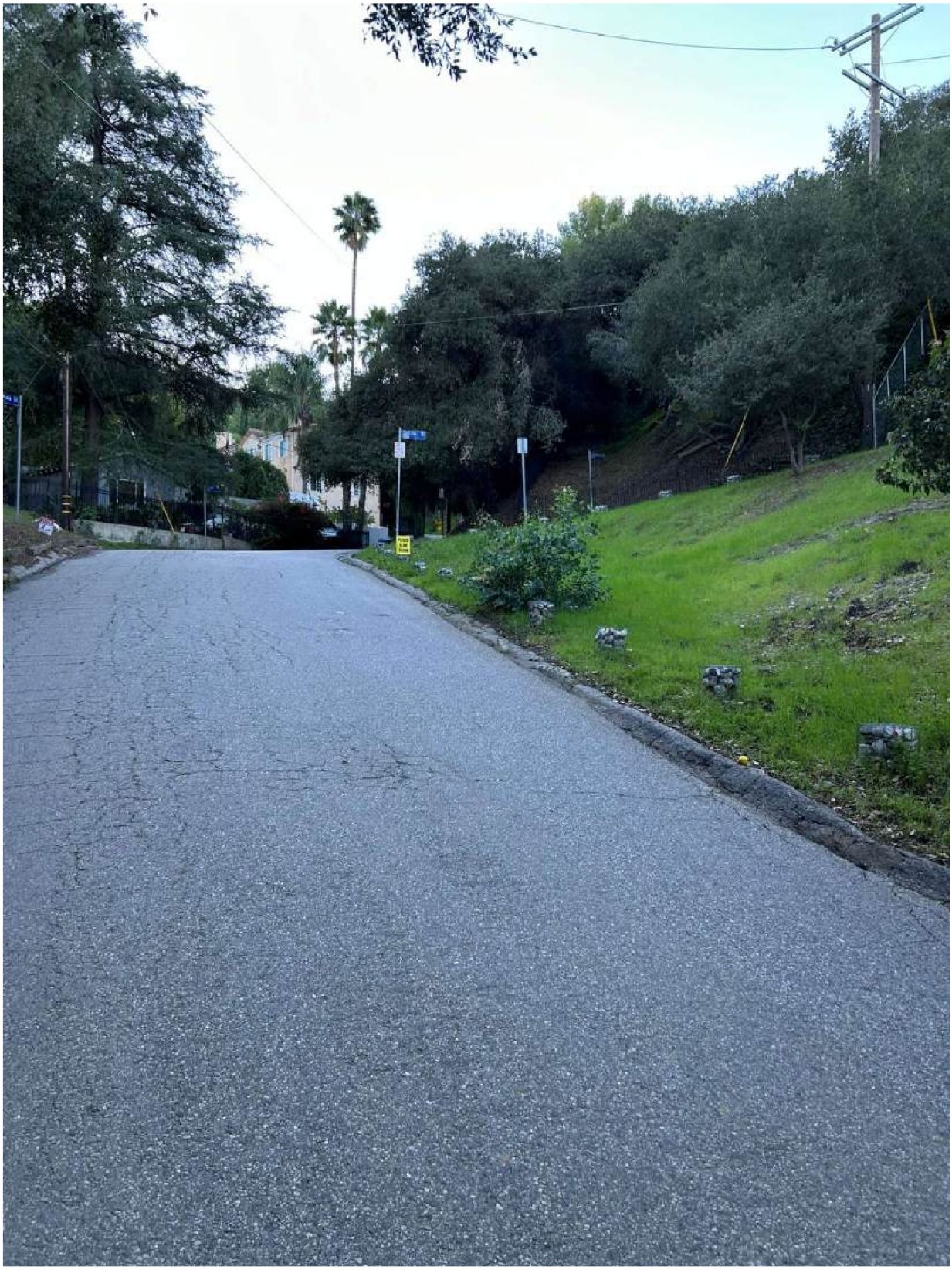


Exhibit 3.10: Photograph of Golondrina Street Looking Eastward

Exhibit 3.11

Photograph of Saltillo Street – Segment 6 Looking Southbound



Exhibit 3.11: Photograph of Saltillo Street – Segment 6 Looking Southbound

Exhibit 3.12

Photograph of Saltillo Street In Front of 4170 Saltillo Street Looking Southward

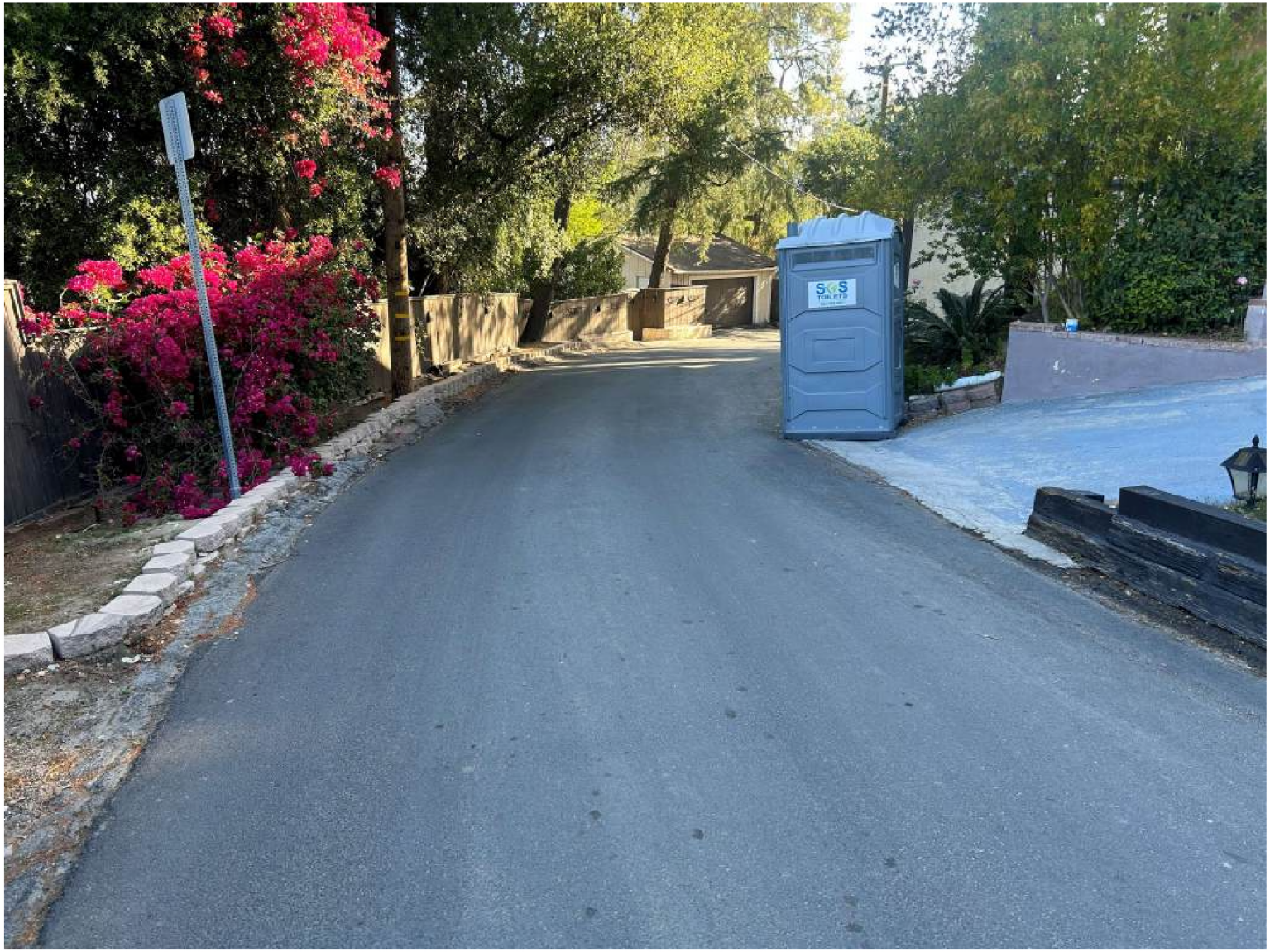


Exhibit 3.12: Photograph of Saltillo Street In Front of 4170 Saltillo Street Looking Southward

ATTACHMENT 2

State Minimum Fire Safe Regulations
Article 2, Ingress and Egress

California Code of Regulations
Title 14 Natural Resources
Division 1.5 – Department of Forestry and Fire Protection
Chapter 7 – Fire Protection
Subchapter 2 – State Minimum Fire Safe Regulations
Article 2 – Ingress and Egress
§ 1273.00 - Intent
§ 1273.01 - Width
§ 1273.02 - Road Surface
§ 1273.03 - Grades
§ 1273.04 - Radius
§ 1273.05 - Turnarounds
§ 1273.06 - Turnouts
§ 1273.07 - Road and Driveway Structures
§ 1273.08 - Dead-End Roads
§ 1273.09 - Gate Entrances

§ 1273.00 - Intent
Roads, and Driveways, whether public or private, unless exempted under 14 CCR § 1270.03(d), shall provide for safe access for emergency Wildfire equipment and civilian evacuation concurrently, and shall provide unobstructed traffic circulation during a Wildfire emergency consistent with 14 CCR §§ 1273.00 through 1273.09.

§ 1273.01 - Width
(a) All roads shall be constructed to provide a minimum of two ten (10) foot traffic lanes, not including shoulder and striping. These traffic lanes shall provide for two-way traffic flow to support emergency vehicle and civilian egress, unless other standards are provided in this article or additional requirements are mandated by Local Jurisdictions or local subdivision requirements. Vertical clearances shall conform to the requirements in California Vehicle Code section 35250.
(b) All One-way Roads shall be constructed to provide a minimum of one twelve (12) foot traffic lane, not including Shoulders. The Local Jurisdiction may approve One-way Roads.
(1) All one-way roads shall, at both ends, connect to a road with two traffic lanes providing for travel in different directions, and shall provide access to an area currently zoned for no more than ten (10) Residential Units.
(2) In no case shall a One-way Road exceed 2,640 feet in length. A turnout shall be placed and constructed at approximately the midpoint of each One-way Road.
(c) All driveways shall be constructed to provide a minimum of one (1) ten (10) foot traffic lane, fourteen (14) feet unobstructed horizontal clearance, and unobstructed vertical clearance of thirteen feet, six inches (13' 6").

§ 1273.02 - Road Surface
(a) Roads shall be designed and maintained to support the imposed load of Fire Apparatus weighing at least 75,000 pounds, and provide an aggregate base.
(b) Road and Driveway Structures shall be designed and maintained to support at least 40,000 pounds.
(c) Project proponent shall provide engineering specifications to support design, if requested by the Local Jurisdiction.

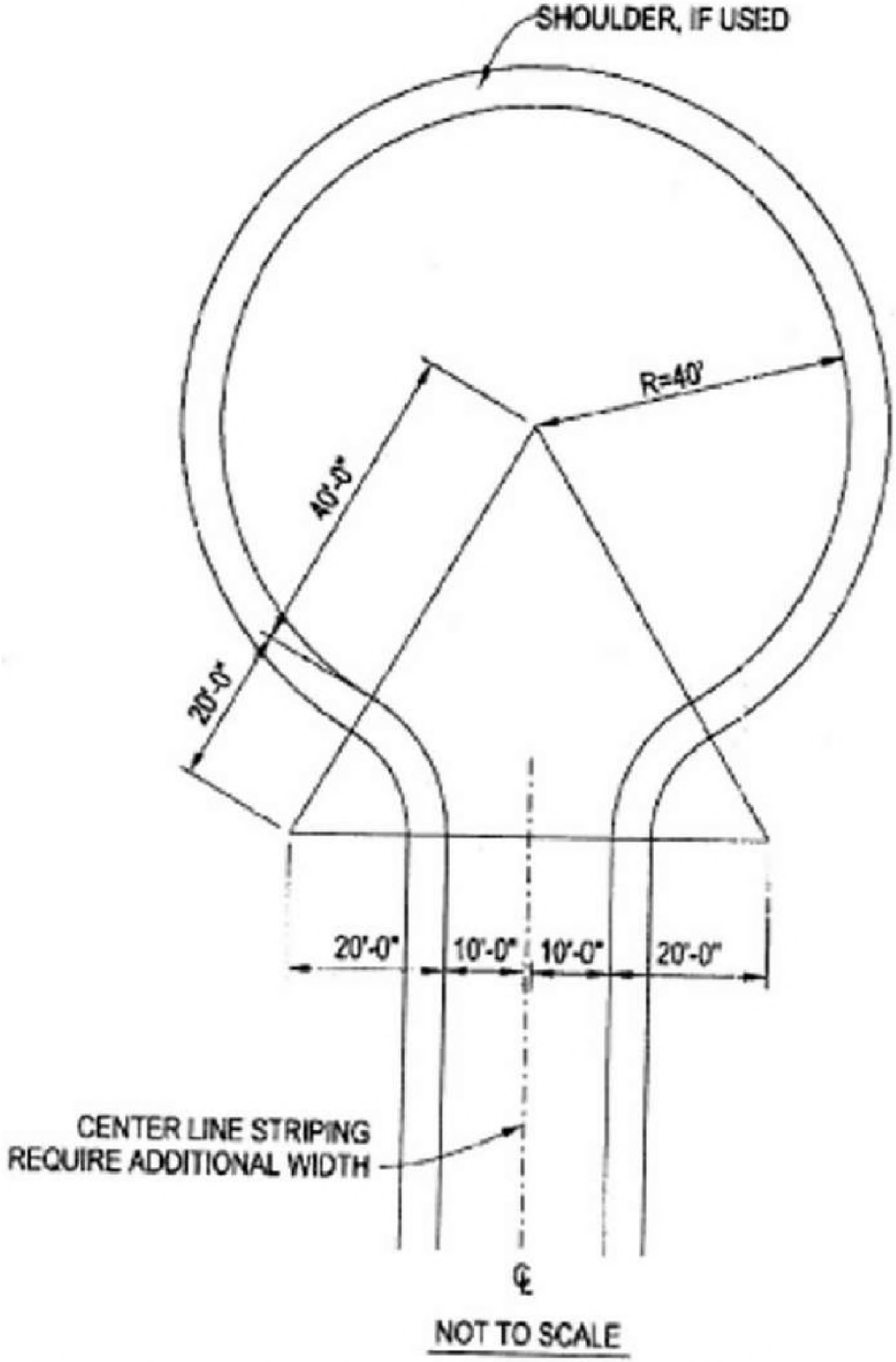
§ 1273.03 - Grades
(a) At no point shall the grade for all Roads and Driveways exceed 16 percent.
(b) The grade may exceed 16%, not to exceed 20%, with approval from the Local Jurisdiction and with mitigations to provide for Same Practical Effect.

§ 1273.04 – Radius

(a) No Road or Road Structure shall have a horizontal inside radius of curvature of less than fifty (50) feet. An additional surface width of four (4) feet shall be added to curves of 50-100 feet radius; two (2) feet to those from 100-200 feet.
(b) The length of vertical curves in *Roadway*s, exclusive of gutters, ditches, and drainage structures designed to hold or divert water, shall be not less than one hundred (100) feet.

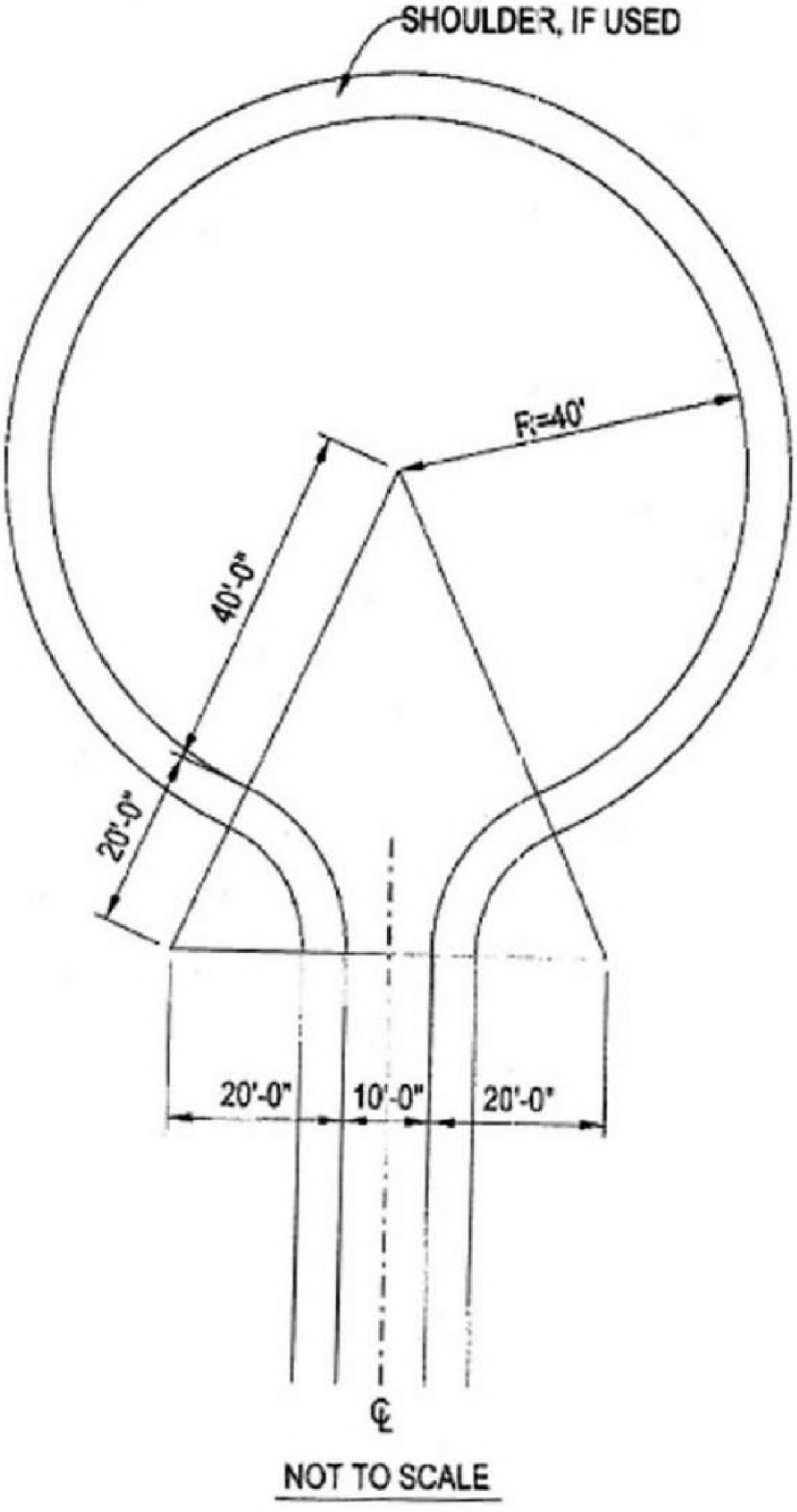
§ 1273.05 – Turnarounds
(a) Turnarounds are required on Driveways and Dead-end Roads.
(b) The minimum turning radius for a turnaround shall be forty (40) feet, not including parking, in accordance with the figures in 14 CCR §§ 1273.05(e) and 1273.05(f). If a hammerhead/T is used instead, the top of the "T" shall be a minimum of sixty (60) feet in length.
(c) Driveways exceeding 150 feet in length, but less than 800 feet in length, shall provide a turnout near the midpoint of the Driveway. Where the driveway exceeds 800 feet, turnouts shall be provided no more than 400 feet apart.
(d) A turnaround shall be provided on Driveways over 300 feet in length and shall be within fifty (50) feet of the building.
(d) Each Dead-end Road shall have a turnaround constructed at its terminus. Where parcels are zoned five (5) acres or larger, turnarounds shall be provided at a maximum of 1,320 foot intervals.

(e) Figure A. Turnarounds on roads with two ten-foot traffic lanes.
Figure A/Image 1 is a visual representation of paragraph (b).



(f) Figure B. Turnarounds on driveways with one ten-foot traffic lane.

Figure B/Image 2 is a visual representation of paragraph (b).



§ 1273.06 – Turnouts
Turnouts shall be a minimum of twelve (12) feet wide and thirty (30) feet long with a minimum twenty-five (25) foot taper on each end.

§ 1273.07 - Road and Driveway Structures
(a) Appropriate signing, including but not limited to weight or vertical clearance limitations, One-way Road or single traffic lane conditions, shall reflect the capability of each bridge.
(b) Where a bridge or an elevated surface is part of a Fire Apparatus access road, the bridge shall be constructed and maintained in accordance with the American Association of State and Highway Transportation Officials Standard Specifications for Highway Bridges, 17th Edition, published 2002 (known as AASHTO HB-17), hereby incorporated by reference. Bridges and elevated surfaces shall be designed for a live load sufficient to carry the imposed loads of fire apparatus. Vehicle load limits shall be posted at both entrances to bridges when required by the local authority having jurisdiction.
(c) Where elevated surfaces designed for emergency vehicle use are adjacent to surfaces which are not designed for such use, barriers, or signs, or both, as approved by the local authority having jurisdiction, shall be installed and maintained.
(d) A bridge with only one traffic lane may be authorized by the Local Jurisdiction; however, it shall provide for unobstructed visibility from one end to the other and turnouts at both ends.

§ 1273.08 - Dead-End Roads
(a) The maximum length of a Dead-end Road, including all Dead-end Roads accessed from that Dead-end Road, shall not exceed the following cumulative lengths, regardless of the number of parcels served:
parcels zoned for less than one acre - 800 feet
parcels zoned for 1 acre to 4.99 acres - 1,320 feet
parcels zoned for 5 acres to 19.99 acres - 2,640 feet
parcels zoned for 20 acres or larger - 5,280 feet
All lengths shall be measured from the edge of the Road surface at the intersection that begins the Road to the end of the Road surface at its farthest point. Where a dead-end road crosses areas of differing zoned parcel sizes requiring different length limits, the shortest allowable length shall apply.
(b) See 14 CCR § 1273.05 for dead-end road turnaround requirements.

§ 1273.09 - Gate Entrances
(a) Gate entrances shall be at least two (2) feet wider than the width of the traffic lane(s) serving that gate and a minimum width of fourteen (14) feet unobstructed horizontal clearance and unobstructed vertical clearance of thirteen feet, six inches (13' 6").

(b) All gates providing access from a Road to a Driveway shall be located at least thirty (30) feet from the roadway and shall open to allow a vehicle to stop without obstructing traffic on that Road.
(c) Where a One-way Road with a single traffic lane provides access to a gated entrance, a forty (40) foot turning radius shall be used.
(d) Security gates shall not be installed without approval. Where security gates are installed, they shall have an approved means of emergency operation. Approval shall be by the local authority having jurisdiction. The security gates and the emergency operation shall be maintained operational at all times.

ATTACHMENT 3

Brandon Araujo's Resume

BRANDON J. ARAUJO, P.E.
(626) 252-1523
brjaraujo@gmail.com

EDUCATION:
Stanford University, Master of Science, Structural Engineering & Geomechanics, June 2008
Stanford University, Bachelor of Science, Civil & Environmental Engineering, June 2007

EXPERIENCE:
City of Hermosa Beach, *Senior Engineer*, Hermosa Beach, CA (05/2024 – PRESENT)
- Project Manager for the complex, multi-agency Greenwich Village Underground Utility Assessment District.
- Prepared, reviewed, interpreted, analyzed, and modified engineering plans, drawings, specifications, contract documents, and engineering reports for conformance to professional standards and approved budgets.
- Possessed excellent organizational skills and ability to manage multiple projects with competing deadlines.
- Administered the Bid & Award phase of projects: issued Notice Inviting Bids, responded to questions, evaluated bids, and recommended project award. Administered contracts after award. Ensured Contractor compliance with the City's contract documents.
- Applied for outside funding for City projects; administered funding and followed reporting requirements as required. Prepared requests for reimbursement and administered grant funds.
- Coordinated assigned activities with other divisions, departments, and outside agencies; attended and participated in professional group meetings.
- Prepared staff reports, and presentation materials, for City Council
- Assisted with, planning, budgeting, and administration of the city-wide Capital Improvement Program, Public Works operating budget, and associated projects.
- Responded to, and resolved, difficult inquiries and complaints from the property owners, contractors, and others regarding Public Works projects and activities.
- Responded to questions and inquiries from a variety of sources regarding department functions.
- Communicated clearly and concisely, both orally and in writing; and established and maintained effective working relationships with those contacted in the course of work.

City of Los Angeles, **Bureau of Engineering**, *Civil Engineer*, Los Angeles, CA (02/2022 – 05/2024)
- Project Manager of a variety of complex Capital Improvement Projects, planned, directed, and coordinated, through subordinates, a variety of complex professional civil engineering assignments related to the delivery of a project portfolio with a construction value of over $100,000,000.
- Served as the project manager on complex Capital Improvement Projects.
- Managed the preparation and performed technical reviews of engineering plans, specifications, construction estimates, and construction bid documents for public works projects.
- Prepared, reviewed, interpreted, analyzed, and modified engineering plans, drawings, specifications, contract documents, and engineering reports for conformance to professional standards and approved budgets.
- Supervised the preparation of special engineering studies and prepared technical reports.
- Possessed excellent organizational skills and the demonstrated the ability to manage multiple projects with competing deadlines.
- Lead, mentored, reviewed, and monitored the work of staff responsible for performing professional engineering work.

- Directed and supervised the technical and administrative work of consultants. Ensured consultant compliance with City standards, specifications, and budget.
- Recommended procedural improvements and modifications.
- Prepared the Bureau's manual on the administration of special assessment and improvement districts.
- Responded to, and resolved, difficult inquiries and complaints from contractors regarding Public Works projects and activities.
- Communicate clearly and concisely, both orally and in writing; and establish and maintain effective working relationships with those contacted in the course of work.

City of Los Angeles, Department of Transportation, Los Angeles, CA (11/2019 – 02/2022)
Transportation Engineer (11/2021-02/2022)
- Transportation Engineer for Vision Zero's Safety Engineering group.
- Worked on implementing lower speed limits throughout the City in response to AB43
- Worked on various policies, programs, and projects to reduce the number of people killed or severely injured in automobile collisions in the City.

Transportation Engineering Associate II (11/2019-11/2021)
- Member of the Metro Programs Division—a one-stop, on-demand service dedicated solely to the Department's review of all of Metro's capital improvement programs within City limits.
- Reviewed, checked, verified, and critiqued the technical validity of Metro's plans to remove and replace all of their transportation system's red light enforcement cameras.
- Communicated effectively, both orally and in writing, with Metro to report the City's findings, explain our positions, and respond to their questions, comments, or concerns.

City of Vernon, *Project Engineer*, Vernon, CA (12/2016 – 11/2019)
- Performed complex professional engineering duties involved in the design and development of the federally-funded Atlantic Boulevard Bridge Widening over the Los Angeles River.
- Prepared, reviewed, interpreted, analyzed, and modified engineering plans, drawings, specifications, contract documents, and engineering reports for conformance to professional standards and approved budgets.
- Possessed excellent organizational skills and ability to manage multiple projects with competing deadlines.
- Issued grading and storm drain permits for private developments as required and ensures\d compliance and conformance with scope of work standards and specifications. Performed inspection of work in the field by contractors and developers for the City's grading and storm drain permits.
- Performed the development, advertising, and selection process for professional services. Evaluated proposals and recommended project award. Negotiated and administered contracts after award. Ensured consultant compliance with City standards, specifications, and budget.
- Applied for outside funding for City projects; administered funding and followed reporting requirements as needed. Prepared and administered grant funds.
- Coordinated assigned activities with other divisions, departments, and outside agencies; attended and participated in professional group meetings.
- Prepared staff reports, and presentation materials, for City Council, Vernon Business and Industry Commission, and other public meetings and represented the City as required.
- Assisted with, planning, budgeting, and administration of the city-wide Capital Improvement Program, Public Works operating budget, and associated projects.

- Responded to, and resolved, difficult inquiries and complaints from the property owners, contractors, and others regarding Public Works projects and activities.
- Responded to questions and inquiries from a variety of sources regarding department functions.
- Communicated clearly and concisely, both orally and in writing; and established and maintained effective working relationships with those contacted in the course of work.

Orange County Public Works, Santa Ana, CA (9/2011 – 12/2016)
Civil Engineer (9/2015-12/2016)
- Planned, laid out, directed, reviewed, and controlled the work of a group of engineering staff.
- Supervised, trained, and evaluated subordinate personnel.
- Supervised the preparation of the temporary traffic control and detour plans for the slurry sealing of all of the collectors and arterial highways within Ladera Ranch.
- Responsible for the Traffic Engineering department's review and approval of the 4.75-mile-long extension of the 241 Toll Road.
- Responsible for the department's review and approval of street improvement plans prepared for arterial and collector streets in new planned communities.
- Initiated the hiring process for Temporary Extra-Help employees: advertised the position, evaluated resumes, interviewed potential candidates, and selected candidates.

Acting Senior Civil Engineer (5/2015-8/2015)
- Managed the Traffic Studies section of the Traffic Engineering Department.
- Planned, laid out, directed, reviewed, and controlled the work of a group of engineering staff to achieve organizational and project objectives in a timely manner.
- Coordinated the work of the Traffic Studies unit to review traffic studies, county property permits, street improvement plans, and signing and striping plans submitted to the Department for review and approval.
- Responsible for the Division's review of tentative tract maps prepared for new planned communities in south Orange County.

Civil Engineer (10/2012-5/2015)
- Prepared plans, specifications, and estimates for traffic-related items for the County's roadway CIP.
- Prepared temporary traffic control plans for construction and permanent signing and striping plans.
- Conducted field inspections of temporary traffic control, signing, and striping.
- Responded to and resolved difficult complaints related to construction projects.
- Made presentations to the general public regarding construction projects.

REGISTRATION:
- Professional Civil Engineer, State of California (License #75996)
- Water & Wastewater Treatment Certificate, Loyola Marymount University
- Building Plans Examiner, International Code Council (Certificate #9703625)

TRAINING:
Geometric Design for California, Institute of Transportation Studies, UC Berkeley
Resident Engineers Academy, Local Technical Assistance Program, Caltrans

SKILLS: MicroStation, AutoCAD, Microsoft Project, SmartSheet, Microsoft Excel, Microsoft Word

Channel Law Group, LLP
8383 Wilshire Blvd., Suite 750
Beverly Hills, CA 90211

EXHIBIT 9

Channel Law Group, LLP

8383 Wilshire Blvd.
Suite 750
Beverly Hills, CA 90211

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

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

*ALSO Admitted in Texas

Writer's Direct Line: (310) 982-1760
jamie.hall@channellawgroup.com

March 21, 2025

VIA EMAIL AND US MAIL

Hon. Marqueece Harris-Dawson, President
Los Angeles City Council
200 N. Spring St., Room 435
Los Angeles, CA 90012
councilmember.harrisdawson@lacity.org

Los Angeles City Clerk
200 N. Spring Street, Room 360
Los Angeles, CA 90012
CityClerk@lacity.org

Hon. Hydee Feldstein Soto, City Attorney
John Heath, Assistant City Attorney
Office of the City Attorney
200 N. Main Street, 701 City Hall East
Los Angeles, CA 90012
hydee.feldsteinsoto@lacity.org
john.heath@lacity.org

Re: Pre-Litigation Demand to Comply with State Minimum Fire Safe Regulations, Cal. Code Regs. tit. 14 § 1270.00 et seq;

Dear Hon. Harris-Dawson and City Attorney Feldstein:

This firm represents the Federation of Hillside and Canyon Associations ("Hillside Federation"), a 501(c)(3) non-profit organization that was founded in 1952. The Hillside Federation represents 47 homeowner and resident associations with approximately 250,000 constituents spanning the Santa Monica Mountains. The Hillside Federation's mission is to promote those policies and programs which will best preserve the natural topography and wildlife of the mountains and hillsides for the benefit of all the people of Los Angeles.

The Hillside Federation is writing to demand that the City comply with the "State Minimum Fire Safe Regulations" ("Regulations") codified at Cal. Code Regs. tit. 14 § 1270.00 et seq.[1] with regard to proposed development projects located in Very High Fire Hazard Severity Zones ("VHFHSZ"). As explained below, the Department of City Planning has taken the position that the Regulations only apply when a new road is constructed. This position is

[1] The Regulations can be accessed at https://www.law.cornell.edu/regulations/california/title-14/division-1.5/chapter-7/subchapter-2

completely without legal support and the Hillside Federation demands that the City commit to compliance with the law.

I. The City's Pattern of Refusing to Order Street Improvements on Substandard Streets in Sensitive Hillside Areas of The City Is a Deadly Policy Failure.

Los Angeles, a city known for its sprawling urban landscape, scenic vistas, and diverse neighborhoods, has faced a long history of devastating wildfires. The combination of urban expansion, high winds, dry conditions, and dense vegetation places much of the City at risk of wildfires, which have caused significant property damage, loss of life, and destruction of the environment over the years. In response to these recurring disasters, both the City of Los Angeles' General Plan Framework and numerous Community Plans with hillside areas have acknowledged the inherent dangers posed by wildfires. However, despite these plans' recognition of the threat, a significant policy gap persists. One of the most glaring oversights is the City's failure to require new development projects to widen the streets as part of the development process, a crucial action for ensuring proper emergency access during wildfire events.

The history of wildfires in Los Angeles is marked by frequent, intense fire seasons, each leaving a lasting mark on the city's communities. In the early 20th century, many of the wildfires were smaller in scale, but by the latter half of the century, fire seasons became progressively more severe due to urbanization, climate change, and increased human activity in the wildland-urban interface areas. Major wildfires such as the Bel Air Fire of 1961 and the more recent Getty Fire in 2019 have left entire neighborhoods scorched, destroying homes and properties, and displacing thousands of residents.[2]

The intensity and frequency of these fires have only increased in recent decades, exacerbated by the region's Mediterranean climate, which features dry summers and autumns coupled with occasional droughts. The 2017 and 2018 fire seasons were some of the most devastating in California's history, with fires such as the Thomas Fire and Woolsey Fire encroaching on Los Angeles, burning hundreds of thousands of acres and causing billions of dollars in damages. The ongoing wildfires have highlighted the City's vulnerability to fire hazards, particularly in neighborhoods adjacent to wooded hillsides, canyons, and open spaces that are prone to ignition.

Recognizing the growing threat of wildfires, the City of Los Angeles incorporated fire risk mitigation strategies into its General Plan Framework and the community plans of the City's General Plan. The General Plan is a long-term policy document that outlines the city's vision for its future development, encompassing land use, infrastructure, and environmental protection. The plan acknowledges that many areas within the city are in high-risk fire zones and identifies

[2] A historical archive of some of the more famous fires in Los Angeles can be accessed at https://www.lafire.com/famous_fires/fires.htm

strategies to reduce wildfire vulnerability through zoning regulations, fire-resistant building codes, and improved emergency response protocols.

The City's General Plan Framework states: "As development occurs, the Fire Department reviews environmental impact reports and subdivisions applications for needed facilities. Where appropriate, construction of new facilities is required as a condition of development." Consistent with this observation, Framework Policy 9.17.4 provides: "Consider the Fire Department's concerns and, where feasible adhere to them, regarding the quality of the area's fire protection and emergency medical services when developing general plan amendments and zone changes, or considering discretionary land use permits." Many concerned community observers have noticed that in recent years that Fire Department has not been commenting on discretionary permits, perhaps due to a failure to properly fund this critical safety activity or internal pressure to stand down, and as a result City decision makers have taken the Department's silence as "permission" to green light waivers of street improvements to enhance emergency access in sensitive areas of the City.

Generally, the City's fire hazard mapping system, known as the Fire Hazard Severity Zones (FHSZ), designates specific areas at high, very high, and moderate risk levels for wildfires. Areas with high and very high ratings include neighborhoods such as the rugged mountainous areas of the western portions of the City like Woodland Hills, Pacific Palisades, Mandeville Canyon, Bel Air, Laurel Canyon, Hollywood Hills, Griffith Park, Runyon Canyon, and on the eastern end of the Santa Monica Mountains like Los Feliz, Glassell Park, Mount Washington, and El Sereno all of which have experienced devastating fires in recent decades. The General Plan recommends strategies such as defensible space (creating a buffer zone around structures to protect against wildfires), fire-resistant landscaping, and infrastructure improvements, particularly in neighborhoods near fire-prone areas.

Additionally, the Los Angeles Fire Department (LAFD) and emergency response agencies have developed plans for quicker evacuations and firefighting operations, considering factors like road access, traffic, and infrastructure. In this context, one would expect that the City's commitment to fire safety would lead to comprehensive measures for fire safety infrastructure, especially regarding the wide, accessible streets necessary for emergency vehicles.

The Bel Air-Beverly Crest Community Plan implements the General Plan Framework stating: "The intensity of land use in the mountain and hillside areas and the density of the population which can be accommodated thereon, should be limited in accordance with the following:

- The adequacy of the existing and assured street circulation system, both within the area and in peripheral areas, to accommodate traffic.
- The availability of sewers, drainage facilities, fire protection services and facilities, and other public facilities."

The Northeast Community Plan, part of Los Angeles' broader set of community plans, specifically addresses areas like Eagle Rock, Highland Park, Glassell Park, Mount Washington, and the eastern sections of the San Fernando Valley, some of which fall within high-risk fire zones. This localized community plan, the result of a decade of hard-fought community activism to protect the plan area's residents from irresponsible development. This Plan takes into account the specific fire hazards faced by these neighborhoods and seeks to implement strategies for reducing fire risks, particularly through zoning and land use regulations that ensure defensible spaces and accessible routes for firefighting personnel and evacuation.

For instance, the Northeast Community Plan generally noted a history of poor City enforcement of land use and building laws: "Lack of effective enforcement of government regulations pertaining to construction, land use, and signage." It also called out the problem of overdevelopment in hillside areas without infrastructure capacities: "Development exceeding infrastructure and service capabilities, particularly in hillside areas." It also stated the new plan should emphasize: "Protecting public safety, health, and welfare by improving enforcement of building and zoning codes." This Community Plan foresaw the risks of failure of the City to address infrastructure inadequacies of neighborhoods subdivided when population was much smaller.

The Northeast Community Plan expressly called for requiring development to consider infrastructure limitations:

> "This requires that standards for adequacy of infrastructure and services must be established and published as part of the environmental review process for the plan **along with margins of safety**. Three categories of adequacy for facilities and services are:
>
> - Essential: required to maintain fundamental community integrity and health, i.e. water and energy supply, solid waste and wastewater disposal, health services
> - Vital: required to provide for the general safety and civil order, i.e. police and fire protection, schools
> - Civilizing: necessary for maintaining communal welfare and quality of life, i.e. libraries, recreational areas, open space, cultural resource" (Emphasis added.)

The Northeast Community Plan pointed out the deficient nature of many hillside streets: "Extensive hillside areas remain unbuilt because they were subdivided at a time when no infrastructure improvements or access was required or provided for …." This was an express reference to streets scraped out by a bulldozer but never paved.

Based upon findings like this, and unlike the generalness of some other community plans in the City, the Northeast Community Plan contained specific policies and programs intended to enforce laws related to safety and access issues in hillside areas:

> "Limit development according to the adequacy of the existing and assured street circulation system within the Plan Area and surrounding areas.

Program: The Plan Map significantly reduces plan designations and corresponding zones in areas located at the base of hillside communities previously designated Medium density residential to reduce impact on access in hillside areas.

Program: Implementation of the Plan is, in part, based on continued application of the Citywide Hillside Ordinance and the Mount Washington/Glassell Park Specific Plan.

1-5.2 Ensure the availability of paved streets, adequate sewers, drainage facilities, fire protection services and facilities, and other emergency services and public utilities to support development in hillside areas.

Program: Decision makers should adopt findings which address the availability of these services and utilities as part of any decision relating to hillside residential development.

Program: Continue the implementation of the Citywide Hillside Ordinance.

1-5.3 Consider the steepness of the topography and the geologic stability in any proposal for development within the Plan area.

Program: The Plan Map retains restrictive land use designations and zones in hillside areas because of topography, geologic stability, and restricted access."

However, despite the express recognition of fire risk in both the General Plan Framework and the City's multiple community plans that constitute its General Plan, **one glaring problem remains: the City has failed to require developers to widen streets located in hillside fire-prone and limited access areas.** Many of these General Plan directives have simply been ignored by City Planners and Planning Commissions in service of ***development at any cost*** – including the safety of existing residents.

Street access is crucial for firefighting and evacuation efforts. Narrow streets, which are common in older neighborhoods, restrict the movement of large fire trucks and emergency vehicles. During a wildfire, these narrow streets can become a bottleneck, preventing first responders from reaching burning areas quickly, or slowing down evacuations and response times. In a city constantly at risk from wildfires, this failure to require street widening in vulnerable areas is seen as an oversight that exposes the city's residents to further risks.

One of the most critical issues in addressing fire safety is the need for adequate emergency vehicle access. Fire trucks and emergency vehicles require a wide clearance to navigate safely, particularly in densely populated areas or neighborhoods surrounded by vegetation. Narrow roads often lead to congestion during fires, slowing down response times and complicating evacuations.

After a fire in Laurel Canyon in 1979 that burned 23 houses, the Los Angeles Fire Department ("LAFD") prepared an after-action report[3] dated October 5, 1979. One of the key conclusions was as follows: "Narrow streets, some practically inaccessible to fire apparatus, coupled with hordes of sight seer, residents and numerous teams from the news media, clogged the streets with autos and foot traffic." Despite the passage of over 45 years, these conditions remain **largely the same**. In the exact same spot where this fire occurred, LAFD Deputy Chief Charles Butler explained to ABC 7 news of the extreme danger that narrow, substandard roads continue to pose to public safety.

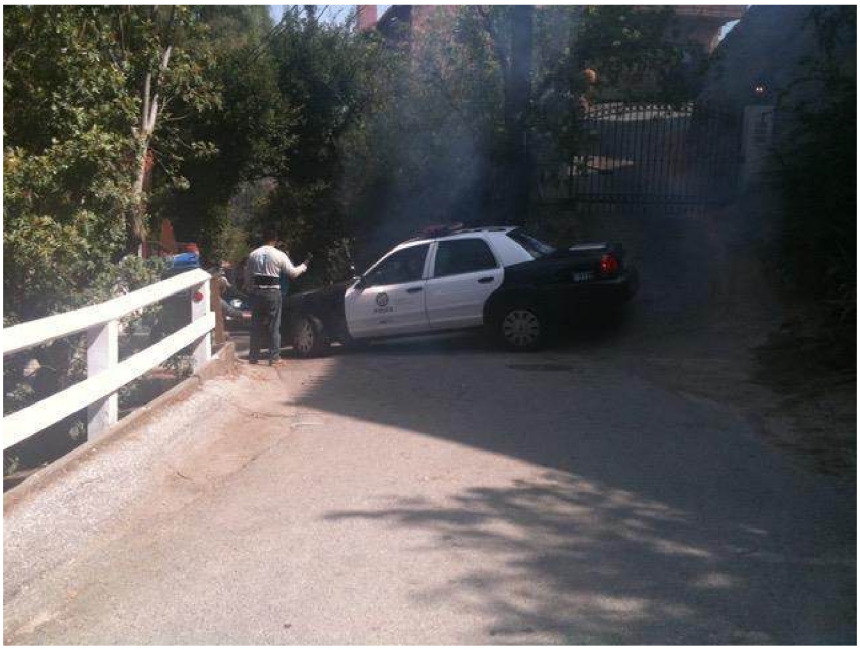


This video may be accessed at https://www.youtube.com/watch?v=AT1742bQ5oE.

Concurrent ingress and egress on roads less than 20 feet wide is almost impossible Pictures of fire trucks and other first responders attempting to navigate through substandard roads in the City are shown below:

[3] This report is available at https://www.lafire.com/famous_fires/1979-0916_KirkwoodBowlFire/091679_kirkwood_F225_BC9.htm


41







The Los Angeles City Planning Department and the Los Angeles Department of Building and Safety (LADBS) have failed to implement General Plan Framework and Community Plan policies that mandate street widenings in fire-prone areas as a condition of new development. While the City has introduced fire-resistant building codes and regulations that affect building design and landscaping, the issue of road access remains largely unaddressed. Developers are often permitted to build projects without requiring any changes to the existing street infrastructure, even in areas identified as high fire risk zones.

This inaction has been compounded by political and economic pressures that prioritize development over infrastructure improvements. New development projects, particularly in areas with rising real estate demand, often receive approval without requiring significant improvements to road access. This has created a situation where areas identified as high fire risk zones continue to develop without addressing the basic need for wider streets and improved access for fire-fighting and emergency vehicles. These practices have become absolutely unacceptable to the residents of Los Angeles who are weary of City bureaucrats, planning commissioners, and other decisionmakers refusing to demonstrate the least bit of concern for the lives and property investment made by the current residents of the City who work here and pay the taxes for the City's operation.

The City's General Plans are required by state law to provide a metric for infrastructure and safety. The City of Los Angeles' failure to require street widening for new development projects in fire-prone areas represents a critical oversight in fire safety and emergency preparedness. As the frequency and intensity of wildfires continue to rise, Los Angeles must reconsider its development policies in fire prone areas and take a more proactive approach to fire safety infrastructure. Ensuring that streets are wide enough for fire trucks and emergency vehicles to operate effectively during a crisis could be one of the simplest yet most impactful measures to protect residents, property, and the City's response capacity in future fire seasons.

The City's Pacific Palisades neighborhood lies in smoldering ruin. At least 12 City residents died there, some frail and unable to evacuate, and others desperate to try to save their homes when the Fire Department was unable to respond to the wind driven flying embers. Runyon Canyon Park was the epicenter of the Sunset Fire and caused massive chaos when mandatory evacuations were ordered by the City. And yet the City is poised to approve a Project in the middle of Runyon Canyon Park that does not comply with the State Minimum Fire Safe Regulations. As if it learned nothing. A picture of the Sunset Fire is shown below from below the homes that were forced to be evacuated.





How many more deaths and billions of dollars of property damages will it take for the residents to lose complete confidence in the ability of the City's leadership to value and protect human life over profits of developers? What will it take for the Mayor and City Council to appoint people to the City Planning/Building Departments/Planning Commissions who do not make their living from the real estate development industry? The current appointees have shown callous disregard to the duty to balance reasonable development interests with proper safety mitigations as simple as street widening to provide a better margin of safety in a climate change world.

Waiver of safety regulations, an act that simply puts more profit into the pockets of real estate developers, was always unacceptable, but today it is simply reckless. ***This background and history, highlights how the conscious attempt of City bureaucrats and uncaring City decision makers to purposely misinterpret mandatory state fire safety regulations to exempt themselves, and their patron real estate developers, from state wildfire safety requirements, as detailed herein, is unconscionable***.

II. State Minimum Fire Safe Regulations

In 2018, Senate Bill 901[4] mandated the expansion of the scope of California's regulations regarding minimum fire safety standards to include those lands classified and designated as Very High Fire Hazard Severity Zones ("VHFHSZ"), as defined in subdivision (i) of Government Code § 51177[5], to include Local Responsibility Areas. These regulations were extended to those portions of incorporated cities such as the City of Los Angeles that were designated as VHFHSZ. Thereafter, the Board of Forestry adopted implementing regulations. The California Board of Forestry and Fire Protection adopted the Minimum Fire Safe Regulations in 2021. The regulations went into effect on April 1, 2023. The purpose of such regulations is to establish *minimum* fire safety standards for residential, commercial, and industrial development, provide basic emergency access and perimeter wildfire protection, protect undeveloped ridgelines, and reduce fire risk. 14 CCR § 1273.02[6]. These regulations were adopted after extensive consultation with fire professionals and community members.

III. Minimum Standards Set Forth in Regulations

Article 2 of the State Minimum Fire Safe Regulations, Section 1273 pertains to the standards for "Ingress and Egress" roads and driveways. The intent of these standards is clearly

[4] Per the Legislative Counsel's Digest, paragraph 6, SB 901 included the following:

> "This bill would also require the state forestry board to adopt regulations implementing minimum fire safety standards that are applicable to lands classified and designated as **very high fire hazard severity zones** and would require the regulations to **apply to the perimeters and access to all residential**, commercial, and industrial building construction **within lands classified and designated as very high fire hazard severity zones**, as defined, after July 1, 2021. The bill would further require the state forestry board to, on and after July 1, 2021, periodically update regulations for fuel breaks and greenbelts near communities to provide greater fire safety for the perimeters to all residential, commercial, and industrial building construction within state responsibility areas **and lands classified and designated as very high fire hazard severity zone**s after that date. The bill would require the state forestry board, on or before July 1, 2022, to develop criteria and maintain a "Fire Risk Reduction Community" list of local agencies located in a state responsibility area **or** a very high fire hazard severity zone that meet best practices for local fire planning." (Emphasis added.)

[5] Government Code section 51177 (i) now defines VHFHSZ as:

> "Very high fire hazard severity zone" means an area designated as a very high fire hazard severity zone by the State Fire Marshal pursuant to Section 51178 that is **not** a state responsibility area. (As amended in 2021, effective 1/1/2022.; Emphasis added.)

[6] Cal. Code Regs. Tit. 14, § 1270.02, entitled "Purpose" states as follows:

(a) Subchapter 2 has been prepared and adopted for the purpose of establishing state minimum Wildfire protection standards in conjunction with Building, construction, and Development in the State Responsibility Area (SRA) and, after July 1, 2021, the Very High Fire Hazard Severity Zones, as defined in Government Code § 51177(i) (VHFHSZ).
(b) The future design and construction of Structures, subdivisions and Developments in the SRA and, after July 1, 2021, the VHFHSZ shall provide for basic emergency access and perimeter Wildfire protection measures as specified in the following articles.
(c) These standards shall provide for emergency access; signing and Building numbering; private water supply reserves for emergency fire use; vegetation modification, Fuel Breaks, Greenbelts, and measures to preserve Undeveloped Ridgelines. Subchapter 2 specifies the minimums for such measures.

stated: "Roads, and Driveways, whether public or private, unless exempted under 14 CCR §1270.03(d) **shall provide for safe access for emergency wildfire equipment and civilian evacuation concurrently**, and shall provide unobstructed traffic circulations during a wildfire emergency consistent with 14 CCR §§1273 through 1273.09."

For "roads," Section 12.73.01(a) of the Regulations require the following:

> (a) All roads shall be constructed to provide a minimum of **two ten (10) foot traffic lanes**, not including shoulder and striping. These traffic lanes shall provide for two-way traffic flow to support emergency vehicle and civilian egress, unless other standards are provided in this article or additional requirements are mandated by Local Jurisdictions or local subdivision requirements. Vertical clearances shall conform to the requirements in California Vehicle Code section 35250.

Cal. Code Regs. tit. 14 § 1273.01(a) (emphasis added). In other words, 20-foot-wide roadways are required.

For "driveways[7]," Section 1273.01(c) of the Regulations requires the following:

> "All driveways shall be constructed to provide a minimum of one (1) ten (10) foot traffic lane, fourteen (14) feet unobstructed horizontal clearance, and unobstructed vertical clearance of thirteen feet, six inches (13' 6")."

Cal. Code Regs. tit. 14 § 1273.01(c).

The Regulations also set forth other requirements for one-way roads, as well as turnouts, turnarounds and gates. 14 CCR §§1273 through 1273.11. Moreover, Article 5 of the Regulations sets forth building siting requirements, setback standards and fuel modification provisions. 14 CCR §§1276.00 through 1276.05.

IV. The City Refuses to Comply with Minimum Requirements Set Forth in the State Minimum Fire Safe Regulations

The Department of City Planning ("Department") has taken the position that the Regulations *only* apply when new roads are constructed. For example, in an appeal currently pending for a Project located at 3003 Runyon Canyon Road, the Department issued an Appeal Recommendations Report[8] that stated as follows:

[7] A "driveway is defined as follows per 14 CCR Section 1270.01(i): "Driveway: A vehicular pathway that serves no more than four (4) Residential Units and any number of non-commercial or non-industrial Utility or Miscellaneous Group U Buildings on each parcel. A Driveway shall not serve commercial or industrial uses at any size or scale."

[8] This report can be accessed at https://clkrep.lacity.org/onlinedocs/2024/24-1371_misc_2-05-25.pdf

"The project does not violate the State Minimum Fire Safe Regulations per CCR Title 14 Natural Resources, Division 1.5 Department of Forestry and Fire Protection, Chapter 7 Fire Protection, Subchapter 2 SRA/VHFHSZ Regulations which establishes minimum wildfire protection standards for projects located in a State Responsibility Area (SRA), and after July 1, 2021, in a Very High Fire Hazard Severity Zone as defined in Government Code Section 51177(i). Specifically, Title 14, CCR Section 1273.01 requires the following:

> 1273.01. Width.
> (a) All roads shall be constructed to provide a minimum of two ten (10) foot traffic lanes, not including shoulder and striping. These traffic lanes shall provide for two-way traffic flow to support emergency vehicle and civilian egress, unless other standards are provided in this article or additional requirements are mandated by Local Jurisdictions or local subdivision requirements. Vertical clearances shall conform to the requirements in California Vehicle Code section 35250.

The subject parcel does not have access via two ten (10) foot traffic lanes. However, Government Code Section 1273.01 only applies to new roads being constructed as it states "all roads **shall be constructed...".** It is not retroactively applied to existing roads that do not meet the dimensional requirement. If it did, that would effectively create a moratorium on all new construction in hillside areas within the entire state - ADUs, building additions, new homes on vacant parcels. The subject project at 3003 N. Runyon Canyon Road will not introduce any features that will change the physical dimensions of the surrounding roadways and/or require the construction of any new roadways. The site is currently accessed via a Private Driveway that itself is accessed from the existing North Runyon Canyon Road which is a paved fire road that is closed to motor vehicle access. The appellant assertion that the project would be responsible to widen the off-site surrounding roadway widths is not supported by the applicable laws and regulations."

Department of City Planning Appeal Recommendation Report dated February 6, 2025.

The City's position is completely without legal justification and remarkable in light of the brush fire that erupted in the middle of Runyon Canyon on January 8, 2025 and burned 43 acres. In 2019, the County of Monterey made the same argument – saying the regulations did not apply to existing roads. The Attorney General's office sent a letter to the County completely refuting this narrow construction of the state regulations. The AG letter states:

> Finally, we note that exempting the Project from the SRA regulations simply because Paraiso Springs Road is a pre-existing road would **undermine the intent** of the **SRA regulations**. SRA regulations are **meant** to ensure that "[t]he future design and construction of structures, subdivisions and developments in the

> SRA shall provide for **basic emergency access** ....” (Cal. Code Regs., tit. 14, § 1270.0l(b).)
> …
> **It is the construction of a new project that triggers the application of the SRA regulations**; the fact that the Project is being constructed at the **end** of an **existing road does not negate** the triggering **effect** of the **new construction**. A contrary interpretation would incentivize development without adequate evacuation routes and emergency access in the SRA rather than prevent it.

(**Exhibit A**[9], pp. 2-3, emph. added [Oct. 25, 2019 Attorney General’s Comment on the Paraiso Springs Resort Project]; see also **Exhibit B**[10] [Attorney General’s March 20, 2019 comment on the same project – Need to comply with roadway width and other requirements in State Responsibility Areas – predates application of requirements to LRAs]. The Attorney General has clearly provided guidance that is the construction of a new project that triggers the application of the regulations – not construction of a new road.

Moreover, the “scope” of the Regulations is much broader than the City contends. The Regulations at 14 CCR § 1276.03(c) state as follows:

> (c) Affected activities include, but are not limited to:
>
> (1) permitting or approval of new parcels, excluding lot line adjustments as specified in Government Code (GC) section 66412(d);
>
> (2) **application for a Building permit for new construction not relating to an existing Structure**;
>
> (3) application for a use permit;
>
> (4) Road construction including construction of a Road that does not currently exist, or extension of an existing Road.

14 CCR § 1276.03(c) (emphasis added).

Moreover, Section 1270.03(a)(1) of the Regulations[11] state that they apply to “(1) the perimeters and access to *all* residential, commercial, and industrial Building construction within

[9] **Exhibit A** is also available at: https://oag.ca.gov/sites/all/files/agweb/pdfs/environment/comments-paraiso-final-eir.pdf

[10] **Exhibit B** is available at https://oag.ca.gov/sites/all/files/agweb/pdfs/environment/comments-paraiso-springs-resort-feir.pdf

[11] Public Resources Code 4290(a) similarly states as follows: “These regulations apply to the perimeters and access to all residential, commercial, and industrial building construction within state responsibility areas approved after

the SRA approved after January 1, 1991, and those approved after July 1, 2021 within the VHFHSZ, except as set forth below in subsection (b)."

The Senior Board Counsel for the Board of Forestry and Fire Protection, Jeff Sloan, wrote a letter to the County of Sonoma regarding the County's requested certification of a proposed local fire safe ordinance as equaling or exceeding the Board's Fire Safe Regulations (14 CCR § 1270 et seq.). See **Exhibit C**. This letter again confirms that the Regulations apply to existing roads. The letter states as follows:

> "Throughout the certification process, Sonoma County has repeatedly maintained that Public Resources Code section 4290 and the Fire Safe Regulations do not apply to existing roads. Sonoma County's position is **incompatible** with the plain language of PRC § 4290, the Fire Safe Regulations, and opinions and letters issued by the Attorney General of California**.** More importantly, the Fire Safe Regulations themselves – which constitute the basis for the certification determination – clearly provide no exemption for existing roads, and it is these regulations that the Sonoma County ordinance must equal or exceed. This represents a fundamental and intractable disagreement between the Board and Sonoma County. Sonoma County's position on existing roads, standing alone, is a legitimate basis for determining that the ordinance does not equal or exceed the Fire Safe Regulations.

Board of Forestry Letter to County of Sonoma dated October 23, 2020 (emphasis added).

Finally, on or about August 17, 2022, the Board of Forestry published a Final Statement of Reasons[12] (FSOR) for the State Minimum Fire Safe Regulations pursuant to Government Code Section 11346.9(a). The FSOR again confirms that the Regulations apply to existing roads, stating as follows:

> **General Response to Comments Regarding Existing Roads:**
>
> Public Resources Code (PRC) § 4290 expressly states that the regulations apply "to the perimeters and access to all residential, commercial, and industrial building construction…" The statute also references roads in multiple places without suggesting an intent to distinguish between existing and new roads. The Board is unaware of any authority suggesting that building construction accessed from existing roads should be treated differently than on new roads.
>
> Further, the regulations do not differentiate between building construction on new roads and building construction on existing roads. The regulations define the term "road"

January 1, 1991, and within lands classified and designated as very high fire hazard severity zones, as defined in subdivision (i) of Section 51177 of the Government Code after July 1, 2021."

[12] The Final Statement of Reasons can be accessed at the following link: https://www.dropbox.com/scl/fi/xa03uiu2jy3cfly2q1x46/2022-08-17-FSOR-Final-Statment-of-Reasons-BOF-PDF-copy-2.pdf?rlkey=acqun4lqpb37w59zo4u3bisc3&st=lxye8i0u&dl=0

in 14 CCR § 1271 without distinguishing between new and existing roads. Section 1273.00 requires all "roads, whether public or private," to satisfy the regulatory requirements (unless exempted under 14 CCR § 1270.02(d)), and again makes no distinction between new and existing roads. When addressing the width of roads, 14 CCR § 1273.01 applies that section to "all roads." In short, the regulations do not provide a basis for distinguishing between building construction on new roads and building construction on existing roads.

While the Board is unaware of any court decision specifically addressing PRC § 4290 or the regulations, the Office of the California Attorney General has commented on the statute and regulations, and its interpretation in those comments may provide helpful guidance. The first was in a 1993 Attorney General Opinion (76 Ops.Cal Atty.19, No. 92-807), which opined that the regulations apply generally to all building construction after 1991 and that the statutory exemption related to pre-1991 parcels was to be narrowly construed to exempt construction and development activity already in the "pipeline" as of 1991. The Board amended the regulations in 2013 in part to ensure consistency with the 1993 Attorney General Opinion.

More recently, and prior to the expansion of the regulations into the VHFHSZ in July 2021, the Office of the Attorney General provided a letter, dated October 25, 2019, to the Planning Commission of Monterey County regarding the Paraiso Springs Resort project. That letter reviewed the Board's regulations regarding existing roads and stated, in pertinent part:

> "[W]hether Paraiso Springs Road is an existing road is inconsequential. Paraiso Springs Road will now be the sole access to the new commercial construction within an SRA."
>
> "SRA regulations explicitly "apply to: (1) the perimeters and *access* to all residential, commercial, and industrial building construction within the SRA approved after January 1, 1991…"" (Emphasis in original.) "Thus, the Monterey County Code exemption for existing roads is inapposite – the Paraiso Springs Road is now "access" to a Project that falls within the scope of the SRA regulations."
>
> "Finally, we note that exempting the Project from the SRA regulations simply because Paraiso Springs Road is a pre-existing road would undermine the intent of the SRA regulations. SRA regulations are meant to ensure that "[t]he future design and construction of structures, subdivisions and developments in the SRA shall provide for basic emergency access…"
>
> "While this road may have been exempt from the SRA width and dead-end road limitations prior to development of the Project, there is no basis for an interpretation that allows construction within the SRA of a large new resort that

> would depend upon the use of that road for the sole emergency access to and evacuation from the Project. It is the construction of a new project that triggers the application of the SRA regulations; the fact that the Project is being constructed at the end of an existing road does not negate the triggering effect of the new construction. A contrary interpretation would incentivize development without adequate evacuation routes and emergency access in the SRA rather than prevent it."
>
> While comments addressing the application of the minimum fire safe regulations to development that is accessed from existing roads do not address the proposal, the information described above may be relevant to those that remain interested in this issue.

Final Statement of Reasons for Reasons, August 17, 2022 (emphasis added).

In sum, the overwhelming body of legal authority demonstrates that the City's position that the Regulations do not apply to existing roads – is flawed.

V. The City is Routinely Approving Permits in Violation of the State Minimum Fire Safe Regulations

The Hillside Federation is aware that the City is routinely approving both discretionary and ministerial permits for new development projects in the Very High Fire Hazard Severity Zones that do not comply with the State Minimum Fire Safe Regulations. For example, on or about December 19, 2024 the City approved a permit for a project at 423 N. Saltillo notwithstanding the fact that Saltillo was less than 20 feet wide.[13] Also, on or about June 18, 2024, the City approved a permit to a developer for a project at 504 W. Avenue 44th notwithstanding the fact that West Avenue 44th at this location is less than 20 feet wide[14]. Also, on November 13, 2024 the City approved a permit for a project at 10453 Sandal even though Sandal Lane is a dead end road that exceeds the maximum length of 800 feet per 14 CCR § 1273.08(a). Also, in 2022 the City issued a building permit for a large multi-purpose building on the campus of Mount Saint Mary' at 12001 Chalon Road even though the parcel was accessed by a roadway of less than 20 feet in width[15]. Finally, on August 8, 2024 the City granted a permit for the project at 3003 Runyon Canyon even though the driveway used to access the property does not have the required turnouts per 14 CCR § 1273.06 or meet the gate entrance standards

[13] The Letter of Determination can be accessed at https://planning.lacity.gov/pdiscaseinfo/document/MjQ3Mzk0/fe3b456d-e5a5-4f0e-9fa7-879f1ff43502/pdd

[14] The Letter of Determination can be accessed at https://planning.lacity.gov/pdiscaseinfo/document/MTgyMzk0/fe3b456d-e5a5-4f0e-9fa7-879f1ff43502/pdd

[15] The City took the position that the Regulations did not apply because the building permit application was submitted prior to the Regulations becoming applicable to the City of Los Angeles (i.e. the applicant had obtained vested rights) However, the date of application is irrelevant. Section 1270.03(a)(1) of the Regulations state that they apply to "(1) the perimeters and access to all residential, commercial, and industrial Building construction within the SRA approved after January 1, 1991, and those approved after July 1, 2021 within the VHFHSZ, except as set forth below in subsection (b)." Applicability is based on approval date, not application date.

set forth at 14 CCR § 1273.09. For the projects at 423 N. Saltillo and 504 W. Avenue 44th the Zoning Administrator issued a Zoning Administrator's Deviation ("ZAD") to deviate from the 20-foot roadway requirement in the City's Hillside Ordinance, which is codified at Los Angeles Municipal Code Section 12.21 C.10(i)(3). However, the State Minimum Fire Safe Regulations provide for the *minimum* standards – the City cannot unilaterally impose a more lenient standard. Section 1270.05 of the Regulations states as follows:

> (a) Subchapter 2 shall serve as the minimum Wildfire protection standards applied in SRA and VHFHSZ. However, Subchapter 2 does not supersede local regulations which equal or exceed the standards of this Subchapter.
>
> (b) A local regulation equals or exceeds a minimum standard of this Subchapter only if, at a minimum, the local regulation also fully complies with the corresponding minimum standard in this Subchapter.
>
> (c) A Local Jurisdiction shall not apply exemptions to Subchapter 2 that are not enumerated in Subchapter 2. Exceptions requested and approved in conformance with § 1270.07 (Exceptions to Standards) may be granted on a case-by-case basis.
>
> (d) Notwithstanding a local regulation that equals or exceeds the State Minimum Fire Safe Regulations, Building construction shall comply with the State Minimum Fire Safe Regulations.

14 CCR § 1270.05.

The Regulations provide a mechanism for "exceptions" to standards, but they can only be granted when the exceptions provide the "same practical effect." 14 CCR § 1270.07(a). Granting a deviation via a ZAD from the 20-foot continuous paved roadway requirement clearly does not have the "same practical effect" as the minimum width requirement in the Regulations. The Attorney General disposed of this argument when they wrote to the County of Monterey in 2019:

> Second, contrary to the assertions in the FEIR (p. 22), **the problems with the existing road cannot be cured through an exception** pursuant to California Code of Regulations, title 14, section 1270.06 (outlining a process to apply for an exception to the applicability of the SRA regulations). **An exception under that regulation still must provide "the same practical effect as" the SRA regulations.** As the FEIR acknowledges, "the Fire Protection Plan cannot modify he dead-end nature of the road" (p. 618). Accordingly, the practical effect of prohibiting dead-end roads of certain lengths in an SRA, which are important to timely evacuation and fire suppression access, cannot be achieved through an exception. **In addition, the Project applicant has not applied for an exception.** (FEIR, p. 23.)

Oct. 25, 2019 Attorney General Comment on the Paraiso Springs Resort Project (emphasis added). The City has similarly not applied for an exception from the Regulations to the Hillside Federation's knowledge.

The City was also put on notice that it was not complying with the State Minium Fire Safe Regulations by the Santa Monica Mountains Conservancy ("Conservancy"), a state and trustee agency. The Conservancy wrote to the Department of City Planning and Los Angeles Department of Building and Safety on May 15, 2023 and yet the City persists in ignoring the Regulations. A copy of this letter is attached as **Exhibit D.**

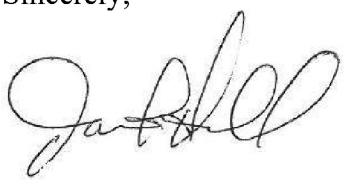
The evidence is clear that the City is not complying with the State minimum Fire Safe Regulations because it does believe that the Regulations are applicable unless a new road is constructed. That is simply not the case. The City has engaged in a pattern and practice of violating the Regulations.

VI. Demand to Comply with State Minimum Fire Safe Regulations

The Pacific Palisades fire is merely a reminder that Los Angeles is situated in a region extremely prone to wildfire. The City will face even higher risks as climate change increases the danger to the City's residents and their significant property investments. If the City does not requirement infrastructure improvements at the time of new development, when will it be required/constructed? The answer is never. As stated in the Introduction, it is truly unconscionable for the City to refuse to acknowledge and adhere to the State Minimum Fire Safe Regulations under these dire circumstances. The residents of Los Angeles deserve better than the way their own lives have been devalued in the pursuit of profits. If the City does not unconditionally commit to adhering to these Regulations and retract its current unlawful interpretation within **10 days of the receipt of this letter**, the Hillside Federation will be compelled to take appropriate legal action in Los Angeles County Superior Court and will seek declaratory and injunctive relief.

Thank you for your consideration of this matter. I may be contacted at jamie.hall@channellawgroup.com.

Sincerely,



Jamie T. Hall

Exhibits:

A. October 25, 2019 Attorney General's Comment on the Paraiso Springs Resort Project
B. March 20, 2019 Attorney General's Comment on the Paraiso Springs Resort Project

C. October 23, 2020 Board of Forestry Letter to County of Sonoma
D. May 15, 2023 Santa Monica Mountains Conservancy Letter to the Department of City Planning and Los Angeles Department of Building and Safety

Cc: councilmember.hernandez@lacity.org
Councilmember.Nazarian@lacity.org
councilmember.blumenfield@lacity.org
contactCD4@lacity.org
councilmember.yaroslavsky@lacity.org
councilmember.padilla@lacity.org
councilmember.rodriguez@lacity.org
councilmember.harris-dawson@lacity.org
councilmember.price@lacity.org
cd10@lacity.org
councilmember.park@lacity.org
councilmember.Lee@lacity.org
councilmember.soto-martinez@lacity.org
Councilmember.Jurado@lacity.org
councilmember.mcosker@lacity.org
Kevin.james@lacity.org
mashael.majid@lacity.org

Osama Younan, Superintendent
Los Angeles Department of Building and Safety
201 N Figueroa St.
Los Angeles, CA 90012
osama.younan@lacity.org

Ted Allen, City Engineer
Bureau of Engineering
Los Angeles Department of Public Works
201 N Figueroa St.
Los Angeles, CA 90012
ted.allen@lacity.org

State of California
Department of Justice
1300 I STREET, SUITE 125
P.O. BOX 944255
SACRAMENTO, CA 94244-2550
Nicole.Rinke@doj.ca.gov
Taylor.Wetzel@doj.ca.gov

EXHIBIT A

October 25, 2019 Attorney General's Comment on the Paraiso Springs Resort Project

XAVIER BECERRA
Attorney General

State of California
DEPARTMENT OF JUSTICE

1300 I STREET, SUITE 125
P.O. BOX 944255
SACRAMENTO, CA 94244-2550

Public: (916) 445-9555
Telephone: (916) 210-7797
Facsimile: (916) 327-2319
E-Mail: Nicole.Rinke@doj.ca.gov

October 25, 2019

Planning Commission of Monterey County
Monterey County Resource Management Agency
Attn: Mike Novo
1441 Schilling Place – South, 2nd Floor
Salinas, CA 93901
Sent via email: novom@co.monterey.ca.us

Re: Paraiso Springs Resort, Project No. PLN040183

Dear Mr. Novo and Commissioners,

We appreciate your preparation of a Final Environment Impact Report ("FEIR") responding to public comments on the previous two Recirculated Draft Environmental Impact Reports ("RDEIRs"), including the comments we submitted on March 20, 2019 and July 9, 2019 regarding wildfire risks associated with the proposed Paraiso Springs Resort Development (the "Project"). After reviewing the additional information presented, we acknowledge and appreciate that you have provided more information regarding wildfire risks associated with the proposed Project and have revised certain mitigation measures to address some of those wildfire risks. While the additional information improves the Project and the environmental documents, we remain concerned that the Project still does not comply with state evacuation and fire suppression access requirements for development in a State Responsibility Area ("SRA").[1] In addition, the FEIR's discussion of the wildfire risks associated with the Project, particularly related to evacuation in the event of a wildfire, remains inadequate.

The Project does not comply with the state's dead-end road limitations and road width limitations applicable to development within an SRA. (Cal. Code. Regs., tit. 14, §§ 1273.08 and 1273.01; adopted pursuant to Pub. Resources Code § 4290.) In response to our July 9, 2019 comments regarding the Project's failure to comply with SRA regulations, the FEIR claims that Paraiso Springs Road is an existing road and thus exempt from such regulations. (FEIR, p. 617.) In support of such an exemption, the FEIR cites to Monterey County Code section 18.56.020(B)(2)(a) which states "[r]egulations contained in this chapter do not apply to the following building, construction, or development activities… (a) Existing structures, roads,

[1] This letter is not intended, and should not be construed, as an exhaustive discussion of the FEIR's compliance with the California Environmental Quality Act ("CEQA") or the Project's compliance with other applicable legal requirements.

streets and private lanes or facilities." (FEIR, p. 23.) However, neither the Monterey County Code nor the SRA regulations support an exemption for this Project for several reasons.

First, whether Paraiso Springs Road is an existing road is inconsequential. Paraiso Springs Road will now be the *sole* access to new commercial construction within an SRA. (February 2018 RDEIR, p. 2-45.) SRA regulations explicitly "apply to: (1) the perimeters and *access to* all residential, commercial, and industrial building construction within the SRA approved after January 1, 1991...." (Cal. Code Regs., tit. 14, § 1270.02, emphasis added.) It is indisputable that the Project involves commercial building construction within the SRA approved after January 1, 1991. Thus, the Monterey County Code exemption for existing roads is inapposite – the Paraiso Springs Road is now "access" to a Project that falls within the scope of the SRA regulations. In addition, the SRA regulations do not expressly exempt all existing roads. (14 Cal. Code Regs., tit. 14, § 1270.02(d) [exempting "[r]oads used solely for agricultural, mining, or the management and harvesting of wood products"].) The Monterey County Code cannot be read to apply less stringent standards than the SRA regulations because counties that assume responsibility for fire prevention and suppression in SRAs must "provide[] the same or higher intensity of fire protection to these lands as is provided under existing levels of state protection in other comparable areas of the state." (Cal. Code Regs., tit. 14, § 1658.)

Second, contrary to the assertions in the FEIR (p. 22), the problems with the existing road cannot be cured through an exception pursuant to California Code of Regulations, title 14, section 1270.06 (outlining a process to apply for an exception to the applicability of the SRA regulations). An exception under that regulation still must provide "the same practical effect as" the SRA regulations. As the FEIR acknowledges, "the Fire Protection Plan cannot modify the dead-end nature of the road" (p. 618). Accordingly, the practical effect of prohibiting dead-end roads of certain lengths in an SRA, which are important to timely evacuation and fire suppression access, cannot be achieved through an exception. In addition, the Project applicant has not applied for an exception. (FEIR, p. 23.)

Third, annexation of Project land into the Mission-Soledad Rural Fire Protection District will not cure violations of the SRA regulations (see FEIR, p. 23 [describing annexation].) Annexation does not exempt a project from SRA regulations. Land can be both within a fire protection district and within the SRA. (Health & Saf. Code § 13811.)

Finally, we note that exempting the Project from the SRA regulations simply because Paraiso Springs Road is a pre-existing road would undermine the intent of the SRA regulations. SRA regulations are meant to ensure that "[t]he future design and construction of structures, subdivisions and developments in the SRA shall provide for basic emergency access...." (Cal. Code Regs., tit. 14, § 1270.01(b).) Constructing a new resort that includes a nearly 150,000 square foot hotel, an over 18,000 square foot "hamlet" with a spa and retail buildings, and over 75 timeshare units (February 2018 RDEIR, pp. 2-20, 2-27) at the end of a narrow road that exceeds the dead-end road regulations undermines emergency access in the SRA. While this road may have been exempt from SRA width and dead-end road limitations prior to development

of the Project, there is no basis for an interpretation that allows construction within the SRA of a large new resort that would depend upon the use of that road for the sole emergency access to and evacuation from the Project. It is the construction of a new project that triggers the application of the SRA regulations; the fact that the Project is being constructed at the end of an existing road does not negate the triggering effect of the new construction. A contrary interpretation would incentivize development without adequate evacuation routes and emergency access in the SRA rather than prevent it.

From a CEQA perspective, the concerns with SRA non-compliance are exacerbated by the gaps that remain in the disclosures the County is providing related to the wildfire risks associated with the Project and specifically the risks associated with evacuation. We will not reiterate our previous comments here, but at this time note the following continuing concerns related to evacuation: (1) the analysis related to evacuees trying to leave the site while emergency response personnel are trying to access the site remains inadequate and conclusory (FEIR, p. 623 [citing back to the Fire Protection Plan and the Wildland Fire Evacuation Plan, which identifies the issue (June 2019 RDEIR, p. 164), but does not describe how it will be addressed]); and (2) the reasonableness of the evacuation time – estimated to be a minimum of 17-18 minutes - has not been defined or compared to a standard of significance, nor is it supported by substantial evidence (June 2019 RDEIR, pp. 61, 140, 141-142).[2]

We appreciate your consideration of our comments and respectfully request that you refrain from certifying the FEIR until it is revised accordingly and refrain from approving the Project until it complies with the SRA. If you have any questions or would like to discuss our comments, please feel free to contact us.

Sincerely,

NICOLE U. RINKE
Deputy Attorney General
HEATHER LESLIE
Deputy Attorney General

For XAVIER BECERRA
Attorney General

[2] We also note that some of our previous comments have not been as fully addressed as would be desirable to fully inform decision-makers and the public. For example, the FEIR assumes that the Project will exacerbate wildfire risk, but does not describe the risk in any detail, making it more difficult to evaluate and address that risk and the associated issues related to evacuation. (See June 2019 RDEIR, p. 64.)

EXHIBIT B

March 20, 2019 Attorney General's Comment on the Paraiso Springs Resort Project

XAVIER BECERRA
Attorney General

State of California
DEPARTMENT OF JUSTICE

1300 I STREET, SUITE 125
P.O. BOX 944255
SACRAMENTO, CA 94244-2550

Public: (916) 445-9555
Telephone: (916) 210-7797
Facsimile: (916) 327-2319
E-Mail: Nicole.Rinke@doj.ca.gov

March 20, 2019

Planning Commission of Monterey County
Monterey County Resource Management Agency
Attn: Mike Novo
1441 Schilling Place – South, 2nd Floor
Salinas, CA 93901
Sent via email: novom@co.monterey.ca.us

Re: Paraiso Springs Resort, Project No. PLN040183

Dear Mr. Novo and Commissioners,

Our office has reviewed the Final Environmental Impact Report ("FEIR") and the Recirculated Draft Environmental Impact Report ("DEIR") for the proposed Paraiso Springs Resort Development ("Project") and respectfully submits the following comments. We request that you consider our comments prior to certifying the FEIR. We spoke with County Counsel and staff on March 20, 2019 and alerted them we would be submitting comments prior to your consideration of the FEIR at your March 27, 2019 Planning Commission meeting.

The Attorney General's Office submits these comments pursuant to the Attorney General's independent power and duty to protect the environment and natural resources of the State from pollution, impairment, or destruction, and in furtherance of the public interest. (See Cal. Const., art. V, § 13; Gov. Code, §§ 12511, 12600-12612; *D'Amico v. Bd. of Medical Examiners* (1974) 11 Cal.3d 1, 14-15.)[1] In the wake of the State's deadliest wildfires this past year and the increased occurrence of fires anticipated throughout the State in coming years, it is particularly important that local jurisdictions carefully review and consider new developments in fire prone areas. This is particularly important for new developments proposed in the wildland urban interface or in other relatively undeveloped and remote areas, like the area where the Project is proposed.

Paraiso Springs Resort, LLC, proposes to develop a spa resort along the floor of a canyon in the foothills at the end of rural Paraiso Springs Road in a "very high fire sensitivity

[1] This letter is not intended, and should not be construed, as an exhaustive discussion of the FEIR's and DEIR's compliance with the California Environmental Quality Act ("CEQA") or the Project's compliance with other applicable legal requirements.

zone." The Project site is bordered to the east by grazing and farm land, and to the north, south and west by the Santa Lucia Mountains. (DEIR 2-1.) The Project site was previously operated as a commercial hot springs resort beginning in 1874. (DEIR 3-137.) The site has seen several fires over the years that have destroyed various structures on the Property, including a fire in 1891 that destroyed one of the more substantial buildings on the property, a fire in 1928 that destroyed the hotel, the bathhouse, a garage, the dance hall, and some other smaller buildings, and another major fire in 1954 that destroyed the rebuilt hotel and annex. (DEIR 2-15, 3-137-3-138.)

Paraiso Springs Road, the sole ingress and egress to the site,[2] is a narrow, two-lane road varying in width from 16 to 22 feet that dead ends at the Project site. (DEIR 2-45.) The road currently serves approximately 90 vehicles per day associated with single-family residences and local vineyards. (DEIR 3-329.) The Project would include the development of 103 hotel rooms, 77 multi-bedroom timeshare units, three restaurants, entertainment facilities, and various spa amenities at the end of this narrow two-lane rural road. (DEIR 2-17 – 2-18.) It is anticipated that there would be several hundred people at the resort on peak days. With the Project at 100% occupancy, there would be over 400 additional vehicle trips per day on the road. (DEIR 3-336.)[3] Additionally, because of parking limitations at the proposed Project site and limitations with the capacity of the rural access road, the Project proposes to shuttle in many of the guests and 90% of all employees from a parking lot nearly two miles away. (DEIR 3-335 – 3-336.)

Monterey County, as the lead agency, has prepared a FEIR for the proposed Project. Despite the acknowledgment that the Project is located in a "very high fire sensitivity zone," the FEIR fails to adequately address the risk of fire in several important respects.[4]

---

[2] In response to CalFire's comments on the DEIR, the FEIR suggests that there is a service road for ingress and egress at the rear of the development. (FEIR, Response to comment letter No. 18, 2-12.) The response cites to maps within the DEIR. (*Ibid.*) These maps show service roads *within* the development, but these roads do not appear to provide ingress and egress *to the Project site.*

[3] We note that several commenters questioned whether the traffic analysis for the Project underestimated the trips that will be associated with the Project. (See, e.g., FEIR, Comment Letter 10 (p 20-23).) While we have not evaluated the adequacy of the traffic analysis, we are concerned that the number of visitors accessing the site may be even higher than anticipated in the FEIR, which would exacerbate our concerns regarding the risks associated with wildfires and the FEIR's inadequate analysis of those risks.

[4] We understand that LandWatch submitted comments to the County on January 15, 2019 raising many of these same issues. The FEIR does not include a response to these comments.

I. THE FEIR MUST ANALYZE THE INCREASED RISK OF WILDFIRE THAT WILL RESULT FROM THE PROJECT.

The FEIR does not, but should, analyze the increased risk of wildfire that will result from siting the proposed development within a high fire sensitivity zone. The DEIR discussed emergency access to the site in the event of fire and onsite measures to provide fire protection.[5] However, the DEIR did not disclose that locating new development in a high fire sensitivity zone will itself increase the risk of fire and, as a result, increase the risk of exposing existing residents in the area as well as guests and employees of the resort to an increased risk of fire. (See CEQA Guidelines Section 15126.2, subd. (a) [requiring the evaluation of potentially significant environmental impacts of locating development in areas susceptible to hazardous conditions such as wildfire risk areas, especially as identified in hazard maps and risk assessments].)[6] It is well-accepted that building in wildland areas increases the risk and severity of fires.[7] The California

---

[5] A preliminary fire protection plan was prepared for the Project. (DEIR 2-55.) Fire protection elements include hydrants, sprinkler systems, and the use of fire-resistant building materials. (DEIR 2-55 – 2-56.) The Project also includes vegetation management for defensible space. (See e.g., DEIR 3-81 – 3-80.) Cal Fire's Department of Forestry and Fire Protection commented on, among other issues, the adequacy of the vegetation management discussed in the DEIR. (FEIR Comment Letter 18.) In response to these comments, the FEIR simply refers back to the DEIR and does not provide any additional commitments or project modifications. (FEIR, Responses to Comment Letter 18, 2-12.)

[6] Our comments are based on the CEQA Guidelines in effect prior to the recent 2019 update, but it is worth noting that the update confirms and clarifies the need to consider wildfire risks as part of the environmental review for new developments subject to CEQA.

[7] See, e.g., Rapid Growth of the U.S. Wildland-Urban Interface Raises Wildfire Risk (February 6, 2018) (https://www.pnas.org/content/pnas/115/13/3314.full.pdf); *New York Times*, Climate Change is Fueling Wildfires Nationwide, New Report Warns (November, 2018) (https://www.nytimes.com/interactive/2018/11/27/climate/wildfire-global-warming.html); *Scientific American*, Living on the Edge: Wildfires Pose a Growing Risk to Homes Built Near Wilderness Areas (https://www.scientificamerican.com/article/living-on-the-edge-wildfires-pose-a-growing-risk-to-homes-built-near-wilderness-areas/); *USDA*, Wildfire, Wildlands, and People: Understanding and Preparing for Wildfire in the Wildland-Urban Interface (January 2013) (https://www.fs.fed.us/rm/pubs/rmrs_gtr299.pdf). While these articles and reports largely focus on the risks of locating housing within fire-prone areas, the same risks would appear to apply for commercial establishments offering overnight lodging. The issue with locating development in these areas is that most fires are human induced, so bringing people into wildland areas creates an increased risk that fire will occur. (*Ibid.*) In addition, the risks of fire are exacerbated because development in wildland areas alters the natural environment (e.g., it fragments native vegetation, introduces nonnatives species, and disturbs soils). (See Rapid Growth of the U.S. Wildland-Urban Interface Raises Wildfire Risk (February 6, 2018) (https://www.pnas.org/content/pnas/115/13/3314.full.pdf).) Further, fire management in developed wildland areas is more challenging because it is more difficult to fight fires in these

Supreme Court has confirmed that this kind of risk must be considered as part of the CEQA analysis for a proposed project. (*California Building Industry Assn. v. Bay Area Air Quality Management Dist.* (2015) 62 Cal.4th 369, 388 [holding that while CEQA does not require consideration of the environment's effect on a project, it does require analysis of the project's impacts on the existing environment].)

Concerns regarding the Project's impact on the occurrence of widlfires were raised in public comments on the DEIR. For example, Lois Panziera noted that "[w]hen more people are added to a high severity fire area, the potential for fires will occur." (FEIR, Letter 7, Comment 75.) In response, the FEIR simply refers back to the DEIR. (FEIR 2-58 – 2-59.) However, as explained above, the DEIR did not address the increased risk of fires that will result from locating new development within a high fire sensitivity zone. The County should address these issues prior to certifying the FEIR.

II. THE FEIR SHOULD ADDRESS EVACUATION IN THE EVENT OF FIRE.

Based upon the onsite fire fighting infrastructure (sprinkler systems, etc.) and the Project proponent's commitment to develop a fire protection plan, the DEIR concludes that the "occupants would be protected to the extent possible in the case of fire" such that the potential impacts associated with wildfire hazards would be less than significant. (DEIR 3-215 – 3-216.) The DEIR describes emergency access *to* the site, but does *not* address: (i) the evacuation of employees and guests in the event of a fire, (ii) the increased challenges that existing users of the sole ingress and egress road will face in the event of an evacuation due to the added users on the road, or (iii) the increased challenges that firefighters and emergency responders would face accessing the site and preventing the spread of a wildfire due to the simultaneous evacuation of guests and employees from the Project and neighboring areas. The EIR should include a more robust discussion of the fire hazards and describe the evacuation plan for guests and employees, as well as neighboring residents and existing users of Paraiso Springs Road. (See *Clews Land & Livestock, LLC v. City of San Diego* (2017) 19 Cal.App.5th 161, 194 [discussing whether or not the EIR adequately considered the risk of fire to future users of the project site, including acceptable evacuation plans]; *California Clean Energy Committee v. County of Placer* (Cal. Ct. App., Dec. 22, 2015, No. C072680) 2015 WL 9412772 [concluding that the EIR failed to adequately evaluate evacuation issues associated with the project].)

In response to public comments, including from CalFire's Department of Forestry and Fire Protection, asking about evacuation plans (see Comment Letter 18 starting on FEIR 2-11), the FEIR promises that a final Fire Protection Plan that includes evacuation procedures will be developed. (FEIR 2-12.) Meaningful analysis of the risk of fire and evacuation plans should not be deferred until after the FEIR is certified and the Project is approved. (See CEQA Guidelines

---

landscapes and fire management strategies that allow natural fires to burn are not an option. (*Ibid.*; see also *USDA*, Wildfire, Wildlands, and People: Understanding and Preparing for Wildfire in the Wildland-Urban Interface (January 2013) (https://www.fs.fed.us/rm/pubs/rmrs_gtr299.pdf).)

Section 15126.4(a)(1)(B).) While the deferment of mitigation measures may sometimes be appropriate, here no basis has been provided for why the evacuation plan was not already prepared as part of the DEIR or FEIR, nor have any performance standards or potential mitigation measures been identified. (*Ibid*; see also, e.g., *San Joaquin Raptor Rescue Center v. County of Merced* (2007) 149 Cal.App.4th 645, 671 [mitigation measure that included development of a post-FEIR management plan was found to be improperly deferred mitigation where no basis was provided for why the development of mitigation measures needed to be deferred to future plans and, no specific criteria, performance standards, or potential mitigation measures were set forth in the EIR].) In addition, based on the discussion in the DEIR, we are concerned that the Fire Protection Plan, when it is developed, may not adequately address the totality of issues related to evacuation (see above).

III. THE PROJECT MUST COMPLY WITH THE REQUIREMENTS FOR STATE RESPONSIBILITY AREAS.

The Project is located in a State Responsibility Area, which is an area for which the Board of Forestry and Fire Protection has designated the State to be financially responsible for preventing and suppressing fires. (Pub. Resources Code, § 4102.) Local jurisdictions may adopt standards for wildfire protections in State Responsibility Areas, but those standards must be at least as stringent as the State's minimum standards and be certified by the State. (Pub. Resources Code, § 4117.) Monterey County has adopted standards for this purpose. (Monterey County Code, §§ 18.56.010 – 18.56.100.) The proposed Project does not appear to comply with these standards.

First, Paraiso Springs Road is a dead end road that terminates at the proposed Project location. Both the County and State standards limit dead end roads to a cumulative length not to exceed 5,280 feet. (Monterey County Code § 18.56.060(11); Cal. Code. Regs., tit. 14, § 1273.09.) The Paraiso Springs Road that would serve as the sole ingress and egress for the Project is 1.9 miles long or 10,032 feet according to Google maps, nearly double the allowable limit. The FEIR and DEIR do not address the Project's failure to comply with the length limitation for dead end roads in State Responsibility Areas.

Second, the width of Paraiso Springs Road will not comply with the local or State standards. State standards generally require a minimum of two 10-foot traffic lanes. (Cal. Code Regs., tit. 14, § 1273.01.)[8] The Project proposes to widen "*the majority of* Paraiso Springs Road to either 18 or 20 feet wide." (DEIR 3-340.) However, the FEIR explains that the road will only be widened "where feasible". (FEIR 2-10). The Project proponent should commit to widening not just a majority of the road, but the entirety of the road, to a distance that complies with the applicable standards.

---

[8] The County requires that all roads have a minimum of two 9-foot traffic lanes. (Monterey County Code, § 18.56.060(3).) Therefore, the State's more stringent requirement would control.

IV. THE PROJECT SHOULD PROVIDE PROXIMAL ACCESS TO A FIRE STATION.

Despite a request from the local fire district, the Project proponent has declined to construct a small fire station onsite, concluding that it would be "incompatible with resort operations." (DEIR 3-307.) The closest fire station is nine miles away, which the program Google Maps reports is an 18-minute drive. The DEIR claims the fire station is within the 15 minutes recommended by the applicable Monterey County General Plan. (DEIR 3-307.) Public comments on the DEIR noted the Project site is not within a 15-minute response time from the Soledad fire station. (See, e.g., Letter 7, Comment 74 starting on FEIR 2-33 and Letter 8, Comment 5 starting on FEIR 2-61). Rather than provide factual support for the DEIR's claim that the fire station is within 15 minutes from the Project site or revise the Project so that it complies with the Monterey County General Plan recommendation, the FEIR simply restates the DEIR's conclusion that "the project would not warrant construction of new or expanded facilities in order to maintain … response times…." (FEIR 2-11). The FEIR should be revised to accurately reflect the distance of the nearest fire station to the Project site and should require compliance with the policy prescribed by the General Plan—preferably with construction of a fire station onsite as requested by the local fire district.

We appreciate your consideration of our comments and respectfully request that you defer certification of the FEIR and approval of the Project until you more fully address the risks of wildfire associated with the Project. If you have any questions or would like to discuss our comments, please feel free to contact us.

Sincerely,

NICOLE U. RINKE
Deputy Attorney General
HEATHER C. LESLIE
Deputy Attorney General

For XAVIER BECERRA
Attorney General

SA2019300293

EXHIBIT C

October 23, 2020 Board of Forestry Letter to County of Sonoma

BOARD OF FORESTRY AND FIRE PROTECTION
THE NATURAL RESOURCES AGENCY
STATE OF CALIFORNIA

KEITH GILLESS, CHAIR
Wade Crowfoot, *Secretary*
Gavin Newsom, *Governor*

P.O. Box 944246
SACRAMENTO, CA 94244-2460
(916) 653-8007
(916) 653-0989 FAX
BOF Website (www.bof.fire.ca.gov)

October 23, 2020

Linda Schiltgen
Deputy County Counsel
County of Sonoma
Linda.Schiltgen@sonoma-county.org

Re: BOF Certification Questions: Sonoma County Responses

Dear Ms. Schiltgen:

The Board is in receipt of your letter dated October 18, 2020, and addressed to Board of Forestry and Fire Protection (Board) Chair Keith Gilless and Vice Chair Darcy Wheeles. It has been distributed to the Board members for consideration. Because your letter provides responses to questions posed by Board staff, please accept this response by Board staff on their behalf.

Background

A brief summary is appropriate for context. For several months, the Board, its staff, and representatives from the County of Sonoma (Sonoma County) have been engaged in discussions relative to the potential certification of Sonoma County's local fire safe ordinance as equaling or exceeding the Board's Fire Safe Regulations (14 CCR § 1270 et seq.). Board members and staff have expressed concerns about portions of Sonoma County's ordinance that either omit standards included in the Fire Safe Regulations or set standards that, on their face, appear to be less stringent than the Fire Safe Standards. At the September 22, 2020, Joint Committee Meeting of the Board, Board staff were directed to provide Sonoma County with a list of specific questions posed by both Board members and staff, that, if answered, would allow Board staff to properly evaluate the local ordinance and enable staff to make a recommendation to the Board in favor of certification. By letter dated October 12, 2020, Board staff issued those questions to Sonoma County. By your letter dated October 18, 2020, Sonoma County provided its responses for Board staff consideration.

When being presented with the myriad of issues related to certification, it is important not to lose sight of the fundamental task before the Board. The Board is reviewing the Sonoma County ordinance pursuant to 14 CCR § 1270.04 to decide whether to exercise its discretion "to certify [the ordinance] as equaling or exceeding [the Board's regulations] when they provide

the same practical effect."[1] While it is generally not difficult to determine whether a particular provision of an ordinance equals or exceeds a corresponding provision in the Board's regulations, the same cannot be said for determining whether a local ordinance that fails to equal or exceed the Board's regulation nonetheless provides the *same practical effect*. To aid in this determination, the Board's regulations provide a detailed definition of the term *same practical effect*. With these tools, the Board must evaluate each provision of a local ordinance and compare it to the corresponding provision in the Board's regulations to determine whether the local ordinance provision equals or exceeds the Board's regulation or provides the same practical effect. Still, the task before the Board is challenging and requires careful and deliberate consideration, especially when applying the complex definition of *same practical effect*.

Summary of Staff Findings

At its core, the Board's task is fundamentally a very narrow inquiry: *For each substantive requirement in the Fire Safe Regulations, does the local ordinance have a provision that equals or exceeds or has the same practical effect as that Fire Safe Regulation standard?*

Board staff have completed their review of Sonoma County's responses and continue to have significant concerns that the ordinance does not satisfy the Board's standards for certification. Sonoma County's responses pertaining to standards for existing roads and for ingress/egress that allows concurrent civilian evacuation are of particular concern. Accordingly, Board staff lack an evidentiary basis to support a recommendation for certification. Board staff have enclosed an updated matrix, dated to reflect the upcoming November 3, 2020, Joint Committee Meeting of the Board, that provides more specific observations and staff recommendations.[2]

This is an appropriate point to address Sonoma County's position that if the Board does not certify its ordinance, then Sonoma County is prevented from enjoying the benefits of the portions of its ordinance that it believes clearly equal or exceed the Fire Safe Regulations. The Board would like to reiterate to Sonoma County that certification of its ordinance by the Board is not required for Sonoma County to apply its own standards that go above and beyond the state minimum standards. Board certification is a creature of regulation, the benefit of which is to publicly document a mutual understanding of the Board and the local jurisdiction that a local ordinance equals or exceeds the Fire Safe Regulations. Under Public Resources Code § 4290, subdivision (c), the Board's minimum standards do not supersede any Sonoma County

[1] References in this letter to the "equal or exceed" standard includes this "same practical effect" standard.

[2] The attached November 3, 2020, matrix represents Board staff's current evaluation and recommendations to the Board, and supersedes any prior matrix, whether final or draft, including the deliberative draft September 4th matrix, which apparently Sonoma County misunderstood to be something more than merely an informal tool to facilitate productive discussion in advance of the September Board meeting.

ordinance that equals or exceeds the minimum state standards.[3] Thus, if Sonoma County has stricter, greater, or enhanced requirements in its ordinance, the lack of certification by the Board does not preclude Sonoma County from deciding to apply these stricter requirements.

Turning now to Sonoma County's responses, it is worth mentioning that it is unnecessary for Board staff to address each individual response. The purpose of the exercise is to provide Board staff sufficient information so that it may complete its evaluation of Sonoma County's ordinance and issue a recommendation for the Board's consideration. As noted above, the certification determination is made in light of the language of the local ordinance and any documents incorporated by reference. Supplemental information, such as Sonoma County's responses, merely illuminates the local jurisdiction's interpretation of its ordinance and how it equals or exceeds the Fire Safe Regulations.

In any event, Sonoma County's responses reflect a number of recurring issues of concern to Board staff that can be summarized generally without focusing on the content of specific responses or specific sections of the ordinance. Board staff have consistently expressed concerns that the Sonoma County ordinance and Administrative Policy do not articulate specific minimum standards for each type of road referenced in the ordinance and Administrative Policy[4] nor does it articulate what standards govern the fire official's assessment that a road provides concurrent civilian evacuation. Board staff's questions were particularized and specific attempts to identify those standards so that Board staff could evaluate where they equal or exceed the Fire Safe Regulations.

Detailed Discussion

Board staff acknowledge that some of Sonoma County's responses on certain other issues resolved Board concerns or provided additional clarity. This letter focuses on major issues that preclude the Board staff from issuing a recommendation in favor of certification. Board staff refer interested parties to the staff-prepared final matrix for the November 3, 2020, Board meeting for a more comprehensive discussion of portions of the ordinance that equal or exceed the Fire Safe Regulations.

Sonoma County's ordinance and responses to staff questions on the following topics are inadequate. Sonoma County's responses do not provide the requested citations nor identify the specific standards that Sonoma County contends apply. Instead, the responses reiterate

[3] It is necessary to acknowledge that the statute does not include a "same practical effect" standard. A local ordinance applied pursuant to Public Resources Code § 4290(c), without obtaining Board certification, must "equal" or "exceed" the Fire Safe Regulations in the ordinarily understood sense of those words. Thus, a non-certified local ordinance applied by a local jurisdiction is potentially subject to a stricter legal standard than is required for certification under 14 CCR § 1270.04.

[4] The ordinance and Administrative Policy contemplate new roads, existing roads, existing public roads, existing private roads, and existing roads approved on a discretionary basis and a ministerial basis. Sonoma County is entitled to have as many subcategories as it chooses, but each must have an established standard that equals or exceeds the Fire Safe Regulations.

positions that, while not unimportant, are nonetheless irrelevant to the narrow certification inquiry before the Board.

We will first address the various arguments that are not relevant to and therefore do not inform staff's analysis.

Sonoma County Argument 1: Some portions of the ordinance equal or exceed the Fire Safe Regulations

Sonoma County's introductory paragraph includes a chart outlining several provisions showing how its ordinance equals or exceeds the Fire Safe Regulations. This general claim is reiterated in response to several questions.

The Board acknowledges that many elements of Sonoma County's standards clearly equal and exceed the minimum standards of the Fire Safe Regulations. This has been well established in documents provided for Board consideration, as well as testimony at several Board and Joint Committee Meetings this year. However, exceeding the Fire Safe Regulations in certain aspects does not excuse an ordinance's failure to equal or exceed other standards imposed by the Fire Safe Regulations.

Thus, the Board's determination that one provision of a local ordinance equals or exceeds the Fire Safe Regulations has no bearing on the Board's consideration of other unrelated provisions of the local ordinance. This argument is an unnecessary distraction and does not inform whether all provisions satisfy the certification standard. As such, the Board does not focus on these statements when applying the certification standard.

Sonoma County Argument 2: Takings / Inability to secure easements for expanding roads

Another argument advanced in Sonoma County's preliminary comments asserts that the Fire Safe Regulations effect an unconstitutional "taking" of private property for public use because they make a landowner individually responsible for upgrading existing roads that serve other parcels. Other variations of this argument suggest that the Fire Safe Regulations encourage Not-In-My-Backyard (NIMBY) opposition to prevent development or allow a landowner to extort a neighbor by refusing to sell an easement to facilitate road widening to comply with state standards. These arguments are also reiterated in response to several questions seeking clarity about Sonoma County's standards and how they equal or exceed the Fire Safe Regulation.

The Fire Safe Regulations have not been legally challenged, let alone invalidated, as being unconstitutional in any sense. They are binding as minimum standards on Sonoma County, notwithstanding speculative practical inconveniences at the local level. It is Sonoma County's prerogative to impose those burdens on individual landowners instead of exercising other options at its disposal, such as eminent domain. In any event, the issue of who bears financial responsibility for upgrading existing roads that serve as access to new building construction has no bearing on whether road standards in Sonoma County's ordinance – such as minimum road

widths – equal or exceed the corresponding standard in the Fire Safe Regulations. As such, the Board does not focus on this argument when evaluating the ordinance for compliance with its certification standard.

Sonoma County Argument 3: Fire Safe Regulation Exception Process

Another argument advanced in Sonoma County's preliminary comments asserts inadequacies in the Fire Safe Regulations' "exception process" (14 CCR § 1270.06), including a loophole authorizing local jurisdictions to waive any requirement in the Fire Safe Regulations. This argument is reiterated in response to several questions.

While the Board appreciates Sonoma County's comments and will certainly takes these into account to consider whether regulatory changes are warranted to address this point, Sonoma County's concerns regarding 14 CCR § 1270.06 do not have bearing on the present issues related to certification of Sonoma County's ordinance, for multiple reasons. First, Sonoma County adopted its own "exceptions to standards" provision, § 13-23, in its ordinance. Notwithstanding certain staff comments in the matrix, the Board may determine that these provisions equal or exceed the minimum standards in § 1270.06. Second, assuming for the sake of argument that 14 CCR § 1270.06 allows for "behind closed doors" determinations, or fails to provide a thorough open and public process, this is irrelevant as to whether *other* sections of Sonoma County's ordinance equal or exceed the Board's minimum standards. Finally, to the extent Sonoma County finds the minimum standards in 14 CCR § 1270.06 unsatisfactory, the regulation expressly states that local jurisdictions "may establish additional procedures or requirements for exception requests." Thus, to the extent Sonoma County believes that the Board's exception standards in § 1270.06 are deficient, Sonoma County may remedy these by imposing additional requirements. Consequently, the Board does not focus on this argument when evaluating the ordinance for compliance with its certification standard.

Sonoma Ordinance Issue 1: Existing Road Standards

We now turn to Sonoma County's discussion of the specific standards and citations in response to the Board staff's questions relating to existing road standards and the concurrent evacuation requirement. Sonoma County's responses continue to make conclusory statements about the quality of its ordinance and Administrative Policy. Board staff are repeatedly told that these documents have "clear standards" and a "strict set of requirements," but do not reference actual standards or citations. Board staff needs this information to properly evaluate the ordinance for certification. Without it, Board staff are compelled to conclude that no such standards exist and recommend to the Board that Sonoma County's ordinance does not satisfy the certification standard for existing roads.

Throughout the certification process, Sonoma County has repeatedly maintained that Public Resources Code section 4290 and the Fire Safe Regulations do not apply to existing roads. Sonoma County's position is incompatible with the plain language of PRC § 4290,[5] the Fire Safe Regulations,[6] and opinions and letters issued by the Attorney General of California.[7] More importantly, the Fire Safe Regulations themselves – which constitute the basis for the certification determination – clearly provide no exemption for existing roads, and it is these regulations that the Sonoma County ordinance must equal or exceed. This represents a fundamental and intractable disagreement between the Board and Sonoma County. Sonoma County's position on existing roads, standing alone, is a legitimate basis for determining that the ordinance does not equal or exceed the Fire Safe Regulations.

Moreover, Sonoma County's position has a discernible impact on it characterizes its ordinance, and the amount of effort necessary for Board staff to parse its assertions for accuracy and compliance with the certification standard. Specifically, any assertion Sonoma County makes about "roads" requires the Board to evaluate whether Sonoma County intends to apply that standard to existing roads.

Setting aside this fundamental disagreement as to the applicability of the Fire Safe Regulations, Sonoma County has argued that, in the alternative, even though it believes existing roads are exempt, Sonoma County's Administrative policy nonetheless applies to existing roads and equals or exceeds the Fire Safe Regulations.

Board staff have reviewed the ordinance and Administrative Policy in great detail. The only specific standard identified in the Administrative Policy is a 12-foot width requirement for existing private roads. On its face, this falls short of the minimum road standard in 14 CCR § 1273.01. That is a significant obstacle to Board certification. More concerning, however, is that the policy provides no standards for other types of existing roads. As noted before, the Administrative Policy contemplates a public/private distinction, as well as a discretionary/ministerial distinction. No standards for these types of existing roads exist in the ordinance or Administrative Policy. Until these deficiencies are remedied to the Board's satisfaction, Sonoma County's ordinance and Administrative Policy is conclusively ineligible for certification. As Sonoma County's responses fail to provide the requested information with sufficient detail, Board staff can only conclude that no such standards exist and recommend to the Board that the ordinance does not meet the certification standard.

Additionally, Sonoma County's reliance on the Administrative Policy as setting the exclusive standard for existing roads raises concerns beyond the road width issues. The Fire Safe

---

[5] "These regulations apply to the perimeters and access to all residential, commercial, and industrial building construction within state responsibility areas… ." (Emphasis added.)

[6] See 14 CCR § 1270.02 which includes the same language in fn5 and includes an exemption for roads that is limited to agricultural, mining, and timber-related operations.

[7] See, e.g., AG Opinion No. 92-807 (1993); AG letter to Monterey County Planning Commission (Oct. 25, 2019).

Regulations set other standards for roads, such as grade, surface requirements, radius, turnouts, turnarounds, and dead end roads. However, the Administrative Policy is silent on those issues, and Sonoma County's responses do not identify what standard, if any, apply for those existing road requirements, and where they can be located in the ordinance or Administrative Policy.

In this respect, Sonoma County's response to Question 1.1.3.3 is emblematic. The Board staff posed a direct request seeking specific information: "For convenience and reference, please complete the following table by filling in the specific ordinance section or Administrative Policy section that addresses the specified SRA Fire Safe Regulation." One axis of the referenced table identified (with citations) all of the above-referenced road requirements in the Fire Safe Regulations that Sonoma County's ordinance must equal or exceed. Along the other axis, the table identified all of the categories of existing roads referenced in the Administrative Policy. Sonoma County's task was to provide an ordinance or Administrative Policy citation in each box.

Board staff believed the table provided the best and simplest opportunity for Sonoma County to provide the information necessary to support certification with respect to requirements for existing roads. Sonoma County's response does not provide any relevant or informative citations. For two columns, Sonoma County cross-referenced six of its other responses to unrelated questions. The County responses did not comply with the call of the question to provide a citation, nor could any relevant citations or standards be discerned from the referenced answers. In fact, some of the cited responses made no mention of the relevant terms. With respect to the remaining categories of existing road standards (public/private and ministerial/discretionary), Sonoma County referenced provisions of its ordinance that apply to *new* roads.[8] These citations are also unresponsive to the call of the question because §13-25(f) of the ordinance clearly states that existing road standards are governed by the Administrative Policy.

In the last couple of weeks, Sonoma County has advanced a new argument indicating that its adoption of an optional appendix from the California Fire Code satisfies the requirement for establishing road requirement standards that satisfy the Fire Safe Regulations. As Board staff made clear in a prefacing comment to Question 2.2 and subsequent follow up questions, compliance with the California Fire Code does not ensure compliance with the Fire Safe Regulations. Those standards are relevant only to the extent that they equal or exceed the Fire Safe Regulations. The Board staff's follow up questions on this point quoted a number of the appendix standards which Sonoma County revised so that the standard may also be satisfied by compliance "with the Sonoma County Fire Safe Standards or as approved by the fire code official." The reference to the Sonoma County standard is a circular reference to the very

[8] If Sonoma County intends the particular referenced ordinance provisions to apply both to new roads and existing roads, the ordinance and Administrative Policy will require substantial revision.

standard that Sonoma County has been unable to identify to Board staff. Additionally, it appears that the fire code official has unfettered discretion to impose any standard – including a lesser standard or no standard at all. Sonoma County's responses do not contradict this reasoning or clarify the requirements. Board staff stand by the position that Sonoma County's adoption of the California Fire Code Appendix is meaningless in connection with establishing that the Sonoma County ordinance and Administrative Policy provide minimum standards that equal or exceed the Fire Safe Regulations' road requirement standards.

Again, Sonoma County has had repeated opportunities to identify and provide citations for these standards. Sonoma County repeatedly declines to do so. Until Sonoma County can provide direct and adequate responses to the Board's important questions, the Board has no evidentiary basis to support a decision to certify the Sonoma County ordinance.

Sonoma County Ordinance Issue 2: Concurrent civilian evacuation

A distinct component of the Fire Safe Regulations that is somewhat related to the road conditions issue is that emergency access requirements must accommodate ingress and egress for emergency vehicles *and concurrent civilian evacuation*. Board members and staff have asked Sonoma County on prior occasions to clarify how Sonoma County's ordinance and Administrative Policy satisfy this requirement.

The Administrative Policy states, in an introductory paragraph, that a Fire Inspector will perform an evaluation to "confirm that the proposed development equals or exceeds the below requirements, and the proposed development shall be safely accessed and served in the case of a wildfire, with adequate ingress, egress and the capacity for concurrent evacuation and emergency response."

We acknowledge and appreciate that Sonoma County confirms in its responses that the concurrent evacuation standard is an additional standard to equaling or exceeding "the below requirements." However, Sonoma County does not articulate what standards guide the Fire Official in making that determination.

The first requirement following that statement in the Administrative Policy highlights the importance of that query. The requirement sets a road width standard for existing private roads at 12-ft plus 1-foot of vegetation clearance on both sides. This leads Board staff to question how a 12-foot road, which falls short of the Fire Safe Regulation road width requirement, could be certified as ensuring concurrent civilian evacuation during a wildfire. Nor does this section of the Administrative Policy provide guidance as to what standards guide the Fire Official in making a subjective determination. Absent clarification – which did not occur in response to the Board staff's questions – the Board is appropriately reluctant in determining that the ordinance and Administrative Policy equal or exceed the Fire Safe Regulations.

In addition, Sonoma County routinely refers Board staff to §§ 13-62 and 13-63, in response to Board staff's concerns about the lack of specific articulable standards in the ordinance and Administrative Policy. Sonoma County's reliance is misplaced, however, as those sections merely confer discretionary authority to require compliance with additional fire safety measures. Critically, permissive authority provides no assurances to the Board that additional requirements will be imposed at the level contemplated by the Fire Safe Regulations.

Conclusion

In conclusion, Sonoma County's responses to questions issued by Board staff fail to resolve a number of significant concerns expressed by Board members and staff over the preceding months. The question before the Board at the November 3, 2020, Board meeting is whether the Sonoma County ordinance equals or exceeds the substantive requirements in the Fire Safe Regulations. At this time, the Sonoma County ordinance and Administrative Policy include requirements that fall short of the Fire Safe Regulations and omit standards that are required as a counterpart to other provisions of the Fire Safe Regulations. Until Sonoma County addresses these infirmities, Board staff lack a basis to recommend, and the Board lacks a legal basis to certify, the ordinance as equaling or exceeding the Fire Safe Regulations.

Consistent with our prior communications and correspondence, this letter reflects only the position of Board staff. We wish to be transparent with Sonoma County regarding our ongoing concerns and how we intend to advise the Board in advance of the November Board meeting. Ultimately, the Board will be responsible for making its own assessment on the question of whether the Sonoma County ordinance should be certified as equaling or exceeding the Fire Safe Regulations. Similarly, we respect the right of Sonoma County to disagree with Board staff positions expressed in this letter or the enclosed matrix when the matter is considered by the Board's Joint Committee on November 3, 2020.

Respectfully,



Jeff Slaton
Senior Board Counsel
Board of Forestry and Fire Protection
Jeffrey.Slaton@bof.ca.gov

EXHIBIT D

May 15, 2023 Santa Monica Mountains Conservancy Letter to the Department of City Planning and Los Angeles Department of Building and Safety

SANTA MONICA MOUNTAINS CONSERVANCY
KING GILLETTE RANCH
26800 MULHOLLAND HIGHWAY
CALABASAS, CA 91302
PHONE (310) 589-3200
FAX (310) 589-3200
WWW.SMMC.CA.GOV

May 15, 2023

Vince Bertoni, Director
Department of City of Planning
City of Los Angeles
201 N. Figueroa Street
Los Angeles, California 90012

Bihn Phan, Chief
Permit and Engineering Bureau
Los Angeles Department of Building and Safety
201 N. Figueroa Street
Los Angeles, California 90012

City of Los Angeles Obligation to Enforce State Minimum Fire Safe Regulations Pursuant to Public Resource Code Section 4290

Dear Mssrs. Bertoni and Phan:

The Santa Monica Mountains Conservancy (Conservancy), the principal State planning agency for the Santa Monica Mountains Zone, finds that City of Los Angeles departments analyzing projects and issuing building permits in Very High Fire Hazard Severity Zones as defined in subdivision (i) of Section 51177 of the Government Code frequently do not comply with State Minimum Fire Safe Regulations pursuant to Public Resource Code Section 4290. These regulations include *restrictions* on development on roadways less than 20 feet wide and on dead-end roads over 800 feet for safe concurrent ingress and egress in the event of an emergency. Yet, the City continues to approve hillside development on roads that do not conform to these regulations with deleterious environmental and safety results.

As of July 1, 2021, per SB 901 and the actions of the State Board of Forestry and Fire Protection, the State Minimum Fire Safe Regulations (Regulations) were expanded to now apply to Local Responsibility Areas not just State Responsibility Areas. As a result, any City building permits approved after July 1, 2021 in Very High Fire Hazard Severity Zones must comply with these minimum State regulations. Such permits and permit applications pertain to new construction not relating to an existing structure and to road construction both for new roads and extensions of existing roads. As a local jurisdiction, the City must provide the Director of Cal Fire with notice of all applications for building

permits, tentative parcel maps, tentative maps, and installation or use permits for construction or development within Very High Fire Hazard Severity Zones. The Director may then make recommendations on the applicable construction, development permits or maps provided by the local jurisdiction (14 CCR 1270.04).

More specifically, Article 2 of the Regulations, Sections 1273 et seq., address Ingress and Egress. The intent of this portion of the Regulations is to require that: "Roads, and Driveways, whether public or private, unless exempted under 14 CCR §1270.03(d) shall provide for safe access for emergency Wildfire equipment and civilian evacuation *concurrently*, and shall provide unobstructed traffic circulations during a Wildfire emergency consistent with 14 CCR §§1273 through 1273.09. Section 1270.03(d) only exempts roads used solely for agriculture, mining, or the management of timberland or harvesting of forest products.

Ingress and Egress Regulations: minimum roadway Width (Section 1273.01) and maximum Dead-End Road length (Section 1273.08).

Section 1273.01(a) requires that:

All roads be constructed "to provide a minimum of two ten (10) foot traffic lanes, not including shoulder and striping. These traffic lanes shall provide for two-way traffic flow to support emergency vehicle and civilian egress, unless other standards are provided in this article or additional requirements are mandated by Local Jurisdictions or local subdivision requirements.

As specified in Section 1273.08(a):

(a) The maximum length of a Dead-end Road, including all Dead-end Roads accessed from that Dead-end Road, shall not exceed the following cumulative lengths, regardless of the number of parcels served:

Parcels zoned for less than one acre – 800 feet
Parcels zoned for 1 acre to 4.99 acres – 1,320 feet

A dead-end road is defined in Section 1270.01(e) of the Regulations as: "A road that has only one point of vehicular ingress/egress, including cul-de-sacs and Roads that loop back on themselves."

The Conservancy appreciates your addressing of these concerns. Please direct any future correspondence to Paul Edelman of our staff by email at edelman@smmc.ca.gov, by phone at 310-589-3200 ext. 128, or at the above letterhead address.

Sincerely,

RUDY J. ORTEGA, JR.
Chairperson

Channel Law Group, LLP
8383 Wilshire Blvd., Suite 750
Beverly Hills, CA 90211

EXHIBIT 10

Channel Law Group, LLP

8383 Wilshire Blvd.
Suite 750
Beverly Hills, CA 90211

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

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

*ALSO Admitted in Texas

Writer's Direct Line: (310) 982-1760
jamie.hall@channellawgroup.com

September 19, 2025

VIA EMAIL AND US MAIL

Hon. Marqueece Harris-Dawson, President
Los Angeles City Council
200 N. Spring St., Room 435
Los Angeles, CA 90012
councilmember.harrisdawson@lacity.org

Hon. Hydee Feldstein Soto, City Attorney
John Heath, Assistant City Attorney
Office of the City Attorney
200 N. Main Street, 701 City Hall East
Los Angeles, CA 90012
hydee.feldsteinsoto@lacity.org
john.heath@lacity.org

Los Angeles City Clerk
200 N. Spring Street, Room 360
Los Angeles, CA 90012
CityClerk@lacity.org

Ronnie Villanueva
Los Angeles Fire Department Chief
200 N Main St.
Los Angeles, CA 90012
ronnie.villanueva@lacity.org

Osama Younan
General Manager of Los Angeles Department of Building and Safety
201 N Figueroa St.
Los Angeles, CA 90012
osama.younan@lacity.org

Alfred Mata
City Engineer
Dept. of Public Works Bureau of Engineering
1149 S. Broadway, Suite 700
Los Angeles, CA 90015
alfred.mata@lacity.org

Vince Bertoni
Planning Director - Los Angeles City Planning
201 N Figueroa St.
Los Angeles, CA 90012
vince.bertoni@lacity.org

Re: Pre-Litigation Demand to Comply with State Minimum Fire Safe Regulations, Cal. Code Regs. tit. 14 § 1270.00 et seq.

To Whom It May Concern:

This firm represents the Federation of Hillside and Canyon Associations ("Hillside Federation"), a 501(c)(3) non-profit organization that was founded in 1952. The Hillside

Federation represents 47 homeowner and resident associations with approximately 250,000 constituents spanning the Santa Monica Mountains. The Hillside Federation's mission is to promote those policies and programs which will best preserve the natural topography and wildlife of the mountains and hillsides for the benefit of all the people of Los Angeles.

The Hillside Federation is writing to demand that the City comply with the "State Minimum Fire Safe Regulations" ("Regulations") codified at Title 14 of the California Code of Regulations ("C.C.R.") § 1270.00 et seq. with regard to proposed projects located in Very High Fire Hazard Severity Zones ("VHFHSZ").[1]

As demonstrated herein, the City maintains a pattern and practice of unlawfully failing to apply the Regulations to developments and permits which are subject to the Regulations. As a result, the City has approved developments and issued permits in violation of numerous minimum fire safety standards intended to mitigate the risk of wildfires, facilitate egress and ensure access for emergency vehicles. Separately, the City has failed to comply with the Regulations by identifying strategic ridgelines that may support fire suppression activities or where development conditions would reduce wildfire risk. The Hillside Federation demands that the City cease its unlawful practice and unconditionally commit to compliance with the Regulations as detailed below.

I. THE STATE MINIMUM FIRE SAFE REGULATIONS ARE INTENDED TO MITIGATE AND ENABLE SUPPRESSION OF CATASTROPHIC WILDFIRES

In 2018, Senate Bill 901[2] mandated the expansion of the scope of California's regulations regarding minimum fire safety standards to include those lands classified and designated as Very

---

[1] Unless otherwise noted, all references herein are to Title 14 of the California Code of Regulations (e.g., 14 C.C.R. § 1270.01 is referenced as Section 1270.01).

[2] Per the Legislative Counsel's Digest, paragraph 6, SB 901 included the following: "This bill would also require the state forestry board to adopt regulations implementing minimum fire safety standards that are applicable to lands classified and designated as **very high fire hazard severity zones** and would require the regulations to **apply to the perimeters and access to all residential**, commercial, and industrial building construction **within lands classified and designated as very high fire hazard severity zones**, as defined, after July 1, 2021. The bill would further require the state forestry board to, on and after July 1, 2021, periodically update regulations for fuel breaks and greenbelts near communities to provide greater fire safety for the perimeters to all residential, commercial, and industrial building construction within state responsibility areas **and lands classified and designated as very high fire hazard severity zone**s after that date. The bill would require the state forestry board, on or before July 1, 2022, to

High Fire Hazard Severity Zones ("VHFHSZ"), as defined in subdivision (i) of Government Code § 51177[3], to include Local Responsibility Areas. These regulations were extended to those portions of incorporated cities such as the City of Los Angeles that were designated as VHFHSZ. Thereafter, the Board of Forestry adopted implementing regulations. The California Board of Forestry and Fire Protection adopted the Minimum Fire Safe Regulations in 2021. The regulations went into effect on April 1, 2023. The purpose of such regulations is to establish *minimum* fire safety standards for residential, commercial, and industrial development, provide basic emergency access and perimeter wildfire protection, protect undeveloped ridgelines, and reduce fire risk. (§ 1273.02.) These regulations were adopted after extensive consultation with fire professionals and community members.

The stated purpose of the Regulations is to "establish[] state minimum Wildfire protection standards in conjunction with Building, construction, and Development" in a VHFHSZ; to ensure that "future design and construction of Structures, subdivisions and Developments" in a VHFHSZ "shall provide for basic emergency access and perimeter Wildfire protection measures as specified in the following articles"; and to "provide for emergency access" compliant with minimum standards in the State Minimum Fire Safe Regulations. (§ 1270.02.)

II. THE CITY MAINTAINS A PATTERN AND PRACTICE OF FAILING TO APPLY THE REGULATIONS TO DEVELOPMENTS AND PERMITS FALLING WITHIN THEIR SCOPE

A. The Regulations Apply to a Wide Range of Activities With Only Narrow Exceptions

The scope of the Regulations is established in § 1270.03, which provides in part:

(a) Subchapter 2 shall apply to:

(1) the perimeters and access to all residential, commercial, and industrial Building construction within the SRA approved after January 1, 1991 , and

---

develop criteria and maintain a "Fire Risk Reduction Community" list of local agencies located in a state responsibility area **or** a very high fire hazard severity zone that meet best practices for local fire planning." (Emphasis added.)

[3] Government Code section 51177 (i) now defines VHFHSZ as:
"Very high fire hazard severity zone" means an area designated as a very high fire hazard severity zone by the State Fire Marshal pursuant to Section 51178 that is **not** a state responsibility area. (As amended in 2021, effective 1/1/2022.; Emphasis added.)

those approved after July 1, 2021 within the VHFHSZ, except as set forth below in subsection (b). [..]

(3) all tentative and parcel maps or other Developments approved after January 1, 1991; and

(4) applications for Building permits on a parcel approved in a pre-1991 parcel or tentative map to the extent that conditions relating to the perimeters and access to the Buildings were not imposed as part of the approval of the parcel or tentative map.

(b) Subchapter 2 does not apply where an application for a Building permit is filed after January 1, 1991 for Building construction on a parcel that was formed from a parcel map or tentative map (if the final map for the tentative map is approved within the time prescribed by the local ordinance) approved prior to January 1, 1991, to the extent that conditions relating to the perimeters and access to the Buildings were imposed by the parcel map or final tentative map approved prior to January 1, 1991.

(c) Affected activities include, but are not limited to:

(1) permitting or approval of new parcels, excluding lot line adjustments as specified in Government Code (GC) section 66412(d);

(2) application for a Building permit for new construction not relating to an existing Structure;

(3) application for a use permit;

(4) Road construction including construction of a Road that does not currently exist, or extension of an existing Road.

B. The City Fails to Apply the Regulations to Several Categories of Developments

The City maintains an unlawful pattern and practice of failing to apply the Regulations to developments and use permits falling within their scope, including but not limited to:

- Approving parcel and tentative maps establishing new parcels;
- Granting Zoning Administrator Determinations and use permits for developments with less than 20 feet of continuous paved roadway to the boundary of the hillside area pursuant to Los Angeles Municipal Code ("LAMC") section 12.24-X.21 and 12.24-X.28;
- Issuing building permits for new construction not relating to an existing structure on parcels approved in a pre-1991 parcel or tentative map, to the extent that conditions relating to the perimeters and access to the buildings were not imposed as part of the approval of the parcel or tentative map;

- Issuing "B" Permits for the construction, extension or widening of roadways; and
- Approving Private Streets for new vehicular access to parcels.

Each of these activities fall within the scope of the Regulations as detailed in Section 1270.03. Yet, as demonstrated in Section II.D, *infra*, the City has on countless occasions approved developments or issued permits without ensuring compliance with the Regulations and without determining whether site-specific Exceptions are warranted. The City therefore maintains a pattern and practice of failing to apply the Regulations and enforce their minimum fire safety standards.

C. The City's Failure to Apply the Regulations Circumvents Essential Minimum Fire Safety Standards

The Regulations establish comprehensive minimum fire safety standards to mitigate the risk and severity of wildfires and to ensure safe egress and emergency access. The Regulations include the following minimum standards which the City has failed to implement as a result of its pattern and practice of failing to apply the Regulations to developments and permits falling within their scope:

1. Road and Driveway Width

The Regulations establish minimum standards for Road and Driveway width. Section 1273.01 provides in part:

(a) All roads shall be constructed to provide a minimum of two ten (10) foot traffic lanes, not including shoulder and striping. These traffic lanes shall provide for two-way traffic flow to support emergency vehicle and civilian egress, unless other standards are provided in this article or additional requirements are mandated by Local Jurisdictions or local subdivision requirements. Vertical clearances shall conform to the requirements in California Vehicle Code section 35250.

(c) All driveways shall be constructed to provide a minimum of one (1) ten (10) foot traffic lane, fourteen (14) feet unobstructed horizontal clearance, and unobstructed vertical clearance of thirteen feet, six inches (13'v 6").

2. Road Surface

The Regulations establish minimum standards for Road material and design. Section 1273.02 provides in part:

(a) Roads shall be designed and maintained to support the imposed load of Fire Apparatus weighing at least 75,000 pounds, and provide an aggregate base.

(b) Road and Driveway Structures shall be designed and maintained to support at least 40,000 pounds.

3. Road and Driveway Grades

The Regulations establish minimum standards for Road and Driveway grades. Section 1273.03 provides:

(a) At no point shall the grade for all Roads and Driveways exceed 16 percent.
(b) The grade may exceed 16%, not to exceed 20%, with approval from the Local Jurisdiction and with mitigations to provide for Same Practical Effect.

4. Radius

The Regulations establish minimum standards for the turning radius of Roads. Section 1273.04 provides in part:

(a) No Road or Road Structure shall have a horizontal inside radius of curvature of less than fifty (50) feet. An additional surface width of four (4) feet shall be added to curves of 50-100 feet radius; two (2) feet to those from 100-200 feet.

5. Turnarounds and Turnouts

The Regulations establish minimum standards for turnarounds and turnouts on Driveways and Dead-End Roads. A Dead-End Road is defined as "A Road that has only one point of vehicular ingress/egress, including cul-de-sacs and Roads that loop back on themselves." Section 1273.05 provides in part:

(a) Turnarounds are required on Driveways and Dead-end Roads.
(b) The minimum turning radius for a turnaround shall be forty (40) feet, not including parking, in accordance with the figures in 14 CCR 1273.05(e) and 1273.05(f). If a hammerhead/Tis used instead, the top of the "T" shall be a minimum of sixty (60) feet in length.
(c) Driveways exceeding 150 feet in length, but less than 800 feet in length, shall provide a turnout near the midpoint of the Driveway. Where the driveway exceeds 800 feet, turnouts shall be provided no more than 400 feet apart.
(d) A turnaround shall be provided on Driveways over 300 feet in length and shall be within fifty (50) feet of the building.
(d) Each Dead-end Road shall have a turnaround constructed at its terminus. Where parcels are zoned five (5) acres or larger, turnarounds shall be provided at a maximum of 1,320 foot intervals.

6. Dead-End Roads

The Regulations establish minimum standards for Dead-End Roads. Section 1273.08 provides:

(a) The maximum length of a Dead-end Road, including all Dead-end Roads accessed from that Dead-end Road, shall not exceed the following cumulative lengths, regardless of the number of parcels served:

parcels zoned for less than one acre - 800 feet
parcels zoned for 1 acre to 4.99 acres - 1,320 feet
parcels zoned for 5 acres to 19.99 acres - 2,640 feet
parcels zoned for 20 acres or larger - 5,280 feet

All lengths shall be measured from the edge of the Road surface at the intersection that begins the Road to the end of the Road surface at its farthest point. Where a dead-end road crosses areas of differing zoned parcel sizes requiring different length limits, the shortest allowable length shall apply.

(b) See 14 CCR 1273.05 for dead-end road turnaround requirements.

7. Setbacks

The Regulations establish minimum standards for building siting and required justifications for any Exception from the setback standards. 14 C.C.R. § 1276.01 provides:

(a) All parcels shall provide a minimum thirty (30) foot setback for all Buildings from all property lines and/or the center of a Road, except as provided for in subsection (b).

(b) 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 such as, but not limited to:

(1) non-combustible block walls or fences; or
(2) non-combustible material extending five (5) feet horizontally from the furthest extent of the Building; or
(3) hardscape landscaping; or
(4) a reduction of exposed windows on the side of the Structure with a less than thirty (30) foot setback; or
(5) the most protective requirements in the California Building Code, California Code of Regulations Title 24, Part 2, Chapter 7A, as required by the Local Jurisdiction.

8. Exceptions

The Regulations establish substantive and procedural requirements for the issuance of Exceptions. Section 1270.05 provides in part:

(c) A Local Jurisdiction shall not apply exemptions to Subchapter 2 that are not enumerated in Subchapter 2. Exceptions requested and approved in conformance with 1270.07 (Exceptions to Standards) may be granted on a case-by-case basis.

The Regulations further require that Exceptions must be requested in writing, with written approvals submitted to CAL FIRE. Section 1270.07 provides in part:

(a) Upon request by the applicant, an Exception to standards within this Subchapter may be allowed by the Inspection entity in accordance with 14 CCR 1270.06 (Inspections) where the Exceptions provide the Same Practical Effect as these regulations towards providing Defensible Space. Exceptions granted by the Local Jurisdiction listed in 14 CCR 1270.06, shall be made on a case-by-case basis only. Exceptions granted by the Local Jurisdiction listed in 14 CCR 1270.06 shall be forwarded to the appropriate CAL FIRE unit headquarters that administers SRA fire protection in that Local Jurisdiction, or the county in which the Local Jurisdiction is located and shall be retained on file at the Unit Office.
(b) Requests for an Exception shall be made in writing to the Local Jurisdiction listed in 14 CCR 1270.06 by the applicant or the applicant's authorized representative. At a minimum, the request shall state the specific section(s) for which an Exception is requested; material facts supporting the contention of the applicant; the details of the Exception proposed; and a map showing the proposed location and siting of the Exception. Local Jurisdictions listed in 1270.06 (Inspections) may establish additional procedures or requirements for Exception requests.

To the extent the City claims that it is authorized to grant Exceptions from the standards in the Regulations, it has failed to comply with the procedures in the Regulations which require case-by-case consideration of the facts, a determination that the Exception provides the Same Practical Effect in fire protection and transmittal to CAL FIRE. The City's failure to comply with these standards makes it impossible for the Hillside Federation and CAL FIRE to review the merits of any claimed Exception and all but guarantees that Exceptions are granted without justification and without imposing conditions to provide the Same Practical Effect.

9. Other Regulations

The limited availability of information regarding certain aspects of approved developments has interfered with the Hillside Federation's ability to provide specific examples of violations of other Regulations, including those addressing road engineering (§ 1273.02), bridges (§ 1273.07), gate entrances (§ 1273.09), water supply (§ 1275.02), hydrants (§ 1275.03) and fire breaks (§ 1276.03). Because the alleged violations stem from the City's wholesale failure to apply the Regulations, it is likely that the City fails to comply with these Regulations as

well. Accordingly, the Hillside Federation demands compliance with the Regulations as a whole, whether or not specific violations have been identified herein.

D. Examples of the City's Pattern and Practice of Failing to Apply the Regulations

The Hillside Federation has identified the following non-exclusive illustrative examples of violations of the specific Regulations due to the City's pattern and practice of unlawfully failing to apply the Regulations to developments and use permits falling within their scope:

TABLE 1:
EXAMPLES OF CITY'S FAILURE TO APPLY MINIMUM FIRE SAFE REGULATIONS[4]

Development/Permit Approval	Violation
Building Permit No. 23010-30000-05180 and Bureau of Engineering "B" Permit No. BR403214 at 10453 W. Sandal Lane	Road/Driveway width is 13 feet, 3 inches (§ 1273.01(a), (c)) Grade is 23.7 percent (§ 1273.03(a)) Failure to provide turnaround (§ 1273.05(a)) Failure to provide turnout (§ 1273.06(c)) Dead-End Road length exceeds 800 feet (§ 1273.08) Failure to provide setback (§ 1276.01) Failure to require Exception for setback (§§ 1276.01, 1270.07)
Building Permit No. 24014-20000-01934 at 10329 W. Siesta Drive	Road turning radius (§ 1273.04(a)) Inadequate dimension of turnaround (§ 1273.05(b)) Failure to provide setback (§ 1276.01) Failure to require Exception for setback (§§ 1276.01, 1270.07)
Building Permit No. 20010-10000-00957 at 15427 W. Milldale Drive	Driveway width less than 14 feet (§ 1273.01(c)) Failure to provide turnout on driveway >150' (§ 1273.06(c)) Failure to provide turnaround on Milldale Drive (§ 1273.05(a)) Dead-End Road length exceeds 800 feet (§ 1273.08)
Building Permits for thirteen new single-family dwellings at 1629-1669 and 1654-1658 N. Bruce Court (see, e.g., Permit No. 19010-10000-02094)	Road turning radius (§ 1273.04(a)) Inadequate dimension of turnaround (§ 1273.05(b)) Failure to provide setback (§ 1276.01) Failure to require Exception for setback (§§ 1276.01, 1270.07)
Building Permit No. 19010-10000-00266 at 1367 N. Casiano Road	Grade exceeds 16 percent (§ 1273.03(a)) Failure to provide turnaround (§ 1273.05(a))

[4] Please note that this firm has done an extraordinary amount of data collection and research and has obtained many other clear and indisputable examples of the City failing to comply with the State Minimum Fire Safe Regulations. The list contained in Table 1 is just a portion of these findings.

	Dead-End Road length exceeds 800 feet (§ 1273.08) Failure to provide setback (§ 1276.01) Failure to require Exception for setback (§§ 1276.01, 1270.07)
Building Permits for dozens of new single-family dwellings on various streets in Porter Ranch (see, e.g., Permit No. 20010-20000-04431 at 20551 W. Hummingbird Court)	Inadequate dimension of turnaround (§ 1273.05(b)) Dead-End Road length exceeds 800 feet (§ 1273.08) Failure to provide setback (§ 1276.01) Failure to require Exception for setback (§§ 1276.01, 1270.07)
Building Permit No. 22010-20000-00742 at 10950 W. Verano Road	Dead-End Road length exceeds 800 feet (§ 1273.08) Failure to provide turnaround (§ 1273.05(a)) Failure to provide setback (§ 1276.01) Failure to require Exception for setback (§§ 1276.01, 1270.07)
Planning Case No. ZA-2023-5368-ZAD-SPP-HCA at 3607 N. Kinney Street	Road width less than 20 feet (§ 1273.01(a)) Failure to provide setback (§ 1276.01) Failure to require Exception for setback (§§ 1276.01, 1270.07)
Planning Case No. ZA-2021-9426-ZAD-DRB-SPP-MSP-HCA at 4337 N. Tosca Road	Road width less than 20 feet (§ 1273.01(a)) Failure to provide setback (§ 1276.01) Failure to require Exception for setback (§§ 1276.01, 1270.07)
Planning Case No. ZA-2019-4079-ZAD-DRB-SPP-MSP at 4621 N. Saltillo Street	Road turning radius (§ 1273.04(a)) Road width less than 20 feet (§ 1273.01(a)) Failure to provide setback (§ 1276.01) Failure to require Exception for setback (§§ 1276.01, 1270.07)
Planning Case No. ZA-2023-1206-ZAD-DRB-SPP-MSP-HCA at 4230 N. Saltillo Street	Road width less than 20 feet (§ 1273.01(a)) Failure to provide setback (§ 1276.01) Failure to require Exception for setback (§§ 1276.01, 1270.07)
Planning Case No. ZA-2022-7295-ZAA-ZAD at 504 W. Avenue 44	Road width less than 20 feet (§ 1273.01(a)) Failure to provide setback (§ 1276.01) Failure to require Exception for setback (§§ 1276.01, 1270.07)
Planning Case No. AA-2021-8380-PMLA at 2359 N. Yorkshire Drive	Grade exceeds 16 percent (§ 1273.03(a)) Road width less than 20 feet (§ 1273.01(a))
Planning Case No. APCSV-2016-4179-SPE-DRB-SPP-MSP-ZV-ZAD at 3003 N. Runyon Canyon Road	Road width less than 20 feet (§ 1273.01(a)) Road turning radius (§ 1273.04(a))
Bureau of Engineering "B" Permit No. BR206342 at 17619 W. Rinaldi Street	Failure to provide turnaround (§ 1273.05(a)) Dead-End Road length exceeds 800 feet (§ 1273.08)

Bureau of Engineering "B" Permit No. BR005088 at 5752 W. Valley Oak Drive	Failure to provide turnaround (§ 1273.05(a)) Dead-End Road length exceeds 800 feet (§ 1273.08)

E. The City Has Failed to Identify Strategic Ridgelines, Jeopardizing Its Ability to Suppress Future Wildfires

The Regulations require the City to identify Strategic Ridgelines, defined as "a Ridgeline identified pursuant to 1276.02(a) that may support fire suppression activities or where the preservation of the Ridgeline as an Undeveloped Ridgeline would reduce fire risk and improve fire protection." The Regulations prohibit or limit development on Strategic Ridgelines. Section 1276.02 provides in part:

(a) The Local Jurisdiction shall identify Strategic Ridgelines, if any, to reduce fire risk and improve fire protection through an assessment of the following factors:
  (1) Topography;
  (2) Vegetation;
  (3) Proximity to any existing or proposed residential, commercial, or industrial land uses;
  (4) Construction where mass grading may significantly alter the topography resulting in the elimination of Ridgeline fire risks;
  (5) Ability to support effective fire suppression; and
  (6) Other factors, if any, deemed relevant by the Local Jurisdiction.

(b) Preservation of Undeveloped Ridgelines identified as strategically important shall be required pursuant to this section.

(c) New Buildings on Undeveloped Ridgelines identified as strategically important are prohibited, as described in subsections (c)(1), (c)(2), and (c)(3).
  (1) New Residential Units are prohibited within or at the top of drainages or other topographic features common to Ridgelines that act as chimneys to funnel convective heat from Wildfires.
  (2) Nothing in this subsection shall be construed to alter the extent to which utility infrastructure, including but not limited to wireless telecommunications facilities, as defined in Government Code section 65850.6, subdivision (d)(2), or Storage Group S or Utility and Miscellaneous Group U Structures, may be constructed on Undeveloped Ridgelines.
  (3) Local Jurisdictions may approve Buildings on Strategic Ridgelines where Development activities such as mass grading will significantly alter the topography that results in the elimination of Ridgeline fire risks.

Prior to the applicability of Section 1276.02 to the City's VHFHSZ, the City was engaged in a process of adopting a proposed Ridgeline Protection Ordinance. The City subsequently abandoned this Ordinance.[5] Elements of the Ridgeline Protection Ordinance were initially incorporated into the proposed Wildlife Ordinance, but were subsequently removed. Neither of these regulations focused on ridgelines as a critical area for fire suppression. The City has an obligation to comply with Section 1276.02 by identifying Strategic Ridgelines and implementing Regulations to ensure adequate fire suppression capabilities in the future.

III. DEMAND FOR COMPLIANCE

To remedy the violations described above, the Hillside Federation demands that, within 60 days of receipt of this letter, the City unconditionally commit to the following:

1. Guarantee that any building permits for new construction not relating to an existing structure, for which Certificates of Occupancy have not already been issued, comply with the State Minimum Fire Safe Regulations;
2. Guarantee that any applications for use permits, including but not limited to requests for Zoning Administrator Determinations or Conditional Use Permits for reductions in continuous paved roadway or maximum road grade, comply with the State Minimum Fire Safe Regulations;
3. Guarantee that the permitting or approval of any new parcels, excluding lot line adjustments, comply with the State Minimum Fire Safe Regulations prior to approval;
4. Guarantee that any road construction or road extension activities, for which Certificates of Occupancy have not already been issued for the associated development project, comply with the State Minimum Fire Safe Regulations;
5. Guarantee that any granted Exception will impose measures to achieve the Same Practical Effect as the regulations towards providing Defensible Space when approving any Exception from the State Minimum Fire Safe Regulations;
6. Follow the required procedures for the granting of Exceptions and provide the California Department of Forestry and Fire Prevention or their designee with notice of approval of Exceptions for building permits, tentative parcel maps, tentative maps, B-permits, and installation or use permits for construction or Development within the VHFHSZ; and

[5] See the Department of City Planning web page for Proposed Land Use Regulations at https://planning.lacity.gov/plans-policies/proposed-land-use-regulations.

7. Identify Strategic Ridgelines to be used for fire suppression or to mitigate wildfire risk, as required by Section 1276.02(a).

IV. CONCLUSION

The Pacific Palisades fire is merely a reminder that Los Angeles is situated in a region extremely prone to wildfire. The City will face even higher risks as climate change increases the danger to the City's residents and their significant property investments. If the City does not requirement infrastructure improvements at the time of new development, when will it be required/constructed? The answer is never. It is truly unconscionable for the City to refuse to acknowledge and adhere to the State Minimum Fire Safe Regulations under these dire circumstances. The residents of Los Angeles deserve better.

Thank you for your consideration of this matter. I may be contacted at jamie.hall@channellawgroup.com.

Sincerely,



Jamie T. Hall

Cc: CD1 Eunisses Hernandez (councilmember.hernandez@lacity.org)
CD2 Adrin Nazarian (Councilmember.Nazarian@lacity.org)
CD3 Bob Blumenfield (councilmember.blumenfield@lacity.org)
CD4 Nithya Raman (contactCD4@lacity.org)
CD5 Katy Yaroslavsky (councilmember.yaroslavsky@lacity.org)
CD6 Imelda Padilla (councilmember.padilla@lacity.org)
CD7 Monica Rodriguez (councilmember.rodriguez@lacity.org)
CD9 Curren D. Price, Jr. (councilmember.price@lacity.org)
CD10 Heather Hutt (cd10@lacity.org)
CD11 Traci Park (councilmember.park@lacity.org)
CD12 John Lee (councilmember.Lee@lacity.org)
CD13 Hugo Soto-Martinez (councilmember.soto-martinez@lacity.org)
CD14 Ysabel J. Jurado (Councilmember.Jurado@lacity.org)
CD15 Tim McOsker (councilmember.mcosker@lacity.org)

Kevin James, Special Assistant City Attorney (kevin.james@lacity.org)
Randall Winston, Deputy Mayor of Infrastructure (Randall.winston@lacity.org)

Channel Law Group, LLP
8383 Wilshire Blvd., Suite 750
Beverly Hills, CA 90211

EXHIBIT 11

From:	Jamie Hall
To:	john.heath@lacity.org; cityclerk@lacity.org; osama.younan@lacity.org; councilmember.harris-dawson@lacity.org; vince.bertoni@lacity.org; councilmember.hernandez@lacity.org; hydee.feldsteinsoto@lacity.org; alfred.mata@lacity.org; contactcd4@lacity.org; councilmember.blumenfield@lacity.org; councilmember.rodriguez@lacity.org; ronnie.villanueva@lacity.org; councilmember.lee@lacity.org; councilmember.nazarian@lacity.org; councilmember.price@lacity.org; councilmember.yaroslavsky@lacity.org; councilmember.padilla@lacity.org; cd10@lacity.org; councilmember.jurado@lacity.org; councilmember.park@lacity.org; councilmember.mcosker@lacity.org; kevin.james@lacity.org; randall.winston@lacity.org; councilmember.soto-martinez@lacity.org
Cc:	Hannah Simon; Shannon Harkins; Greg Wittmann; Veronica Lebron
Subject:	Re: Pre-Litigation Demand to Comply with State Minimum Fire Safe Regulations, Cal. Code Regs. tit. 14 § 1270.00 et seq.
Date:	Tuesday, December 23, 2025 3:16:03 PM

Please be advised that the State Alliance for Firesafe Road Regulations joins in the demand letter sent by the Federation of Hillside and Canyon Associations dated September 19, 2025.

Jamie T. Hall
Channel Law Group, LLP
8383 Wilshire Blvd., Suite 750
Beverly Hills, CA 90211
Main Number: (310) 347-0050
Direct: (310) 982-1760
Fax: (323) 723-3960
Email:jamie.hall@channellawgroup.com
Website: www.channellawgroup.com

****NOTICE****

I receive many e-mails on a daily basis and am unable to respond to all of them despite my best efforts. If you have sent me an e-mail that requires my attention and I have not responded, it may have been overlooked. I ask that you call me at 310-982-1760.

****CONFIDENTIAL & PRIVILEGED TRANSMISSION****
The information contained within this e-mail and any attached document(s) is confidential and/or privileged. It is intended solely for the use of the addressee(s) named above. Unauthorized disclosure, photocopying, distribution or use of the information contained herein is prohibited. If you believe that you have received this e-mail in error, please notify the sender by reply transmission and delete the message without copying or disclosing it.

Please consider the environment before printing this email

On Fri, Sep 19, 2025 at 4:44 PM Hannah Simon <admin@channellawgroup.com> wrote:

> Good afternoon,
>
> Please see the attached letter. Please confirm receipt.
>
> Thank you.
>
> Hannah Simon
> Legal Assistant
> Channel Law Group, LLP
> 8383 Wilshire Blvd., Suite 750
> Beverly Hills, CA 90211
> Office Phone No. (310) 347-0050

Direct Phone No. (424) 276-7263
Fax: (323) 723-3960
admin@channellawgroup.com

****CONFIDENTIAL & PRIVILEGED TRANSMISSION****
The information contained within this e-mail and any attached document(s) is confidential and/or privileged. It is intended solely for the use of the addressee(s) named above. Unauthorized disclosure, photocopying, distribution or use of the information contained herein is prohibited. If you believe that you have received this e-mail in error, please notify the sender by reply transmission and delete the message without copying or disclosing it.

Channel Law Group, LLP
8383 Wilshire Blvd., Suite 750
Beverly Hills, CA 90211

EXHIBIT 12

Channel Law Group, LLP

8383 Wilshire Blvd.
Suite 750
Beverly Hills, CA 90211

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

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

*ALSO Admitted in Texas

Writer's Direct Line: (310) 982-1760
jamie.hall@channellawgroup.com

December 23, 2025

VIA U.S. Mail

Office of the Attorney General
1300 "I" Street Suite 125
Sacramento, CA 94244-2550

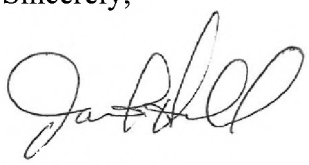
Re: Notice to Attorney General – Challenge to Unlawful Pattern and Practice of Failure to Enforce the State Minimum Fire Safe Regulations; Challenge to Issuance of Building Permits at 10453 Sandal Lane (Board File 250845) ("Project")
Federation of Hillside and Canyon Associations, Inc., et al. v. City of Los Angeles, et al.

Honorable Attorney General Bonta:

Pursuant to California Code of Civil Procedure § 388, enclosed please find a copy of the Verified Petition for Writ of Mandate and Complaint for Declaratory and Injunctive Relief filed by Federation of Hillside and Canyon Associations, Inc. and State Alliance for Firesafe Road Regulations ("Petitioners") against the City of Los Angeles ("City" or "Respondent"). The Petition was filed in Los Angeles Superior Court and challenges, inter alia, the City's unlawful pattern and practice of failing to enforce the State Minimum Fire Safe Regulations. As an example of such noncompliance, the Petition challenges the issuance of building permits at 10453 Sandal Lane and the Board of Building and Safety Commissioners' denial of Petitioners' appeal of those building permits. Josephson Investments, Inc. is named as a Real Party in Interest.

Please call if you have any questions.

Sincerely,



Jamie T. Hall

Enclosure: Verified Petition for Writ of Mandate