Communication from Public

Name:	James Lloyd
Date Submitted:	05/04/2026 05:09 PM
Council File No:	26-0516
Comments for Public Posting:	See attached public comment re proposed 29-unit housing development project at 3842 and 3852 West Roble Vista Drive, 26-0516.

May 4, 2026

City of Los Angeles
200 North Spring Street
Los Angeles, CA 90012

Re: Proposed Housing Development Project at 3842 and 3852 West Roble Vista Drive / 26-0516 and 26-0516-S1

To: submitted electronically

Cc: Erin Strelich, erin.strelich@lacity.org; City Clerk's Office, clerk.cps@lacity.org; City Attorney's Office, cityatty.help@lacity.org;

Dear Los Angeles City Council,

The California Housing Defense Fund ("CalHDF") submits this letter to remind the City of its obligation to abide by all relevant state laws when evaluating the proposed 29-unit housing development project at 3842 and 3852 West Roble Vista Drive. These laws include the Housing Accountability Act ("HAA") and AB 130.

The HAA provides the project legal protections. It requires approval of zoning and general plan compliant housing development projects unless findings can be made regarding specific, objective, written health and safety hazards. (Gov. Code, § 65589.5, subd. (j).) The HAA also bars cities from imposing conditions on the approval of such projects that would reduce the project's density unless, again, such written findings are made. (*Ibid.*) As a development with at least two-thirds of its area devoted to residential uses, the project falls within the HAA's ambit, and it complies with local zoning code and the City's general plan. The HAA's protections therefore apply, and the City may not reject the project except based on health and safety standards, as outlined above. Furthermore, if the City rejects the project or impairs its feasibility, it must conduct "a thorough analysis of the economic, social, and environmental effects of the action." (*Id.* at subd. (b).)

As the communication from the Department of City Planning notes, the project has met all of the requirements for a statutory exemption from CEQA pursuant to AB 130 (Pub. Res. Code, § 21080.66). Caselaw from the California Court of Appeal affirms that local governments err, and may be sued, when they improperly refuse to grant a project a CEQA

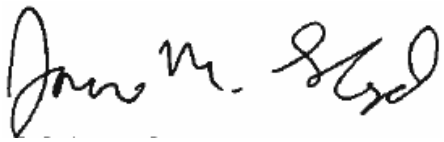
exemption or streamlined CEQA review to which it is entitled. (*Hilltop Group, Inc. v. County of San Diego* (2024) 99 Cal.App.5th 890, 911.)

As you are well aware, California remains in the throes of a statewide crisis-level housing shortage. New housing such as this is a public benefit: it will increase the city's tax base; it will bring new customers to local businesses; and it will reduce displacement of existing residents by reducing competition for existing housing. It will also help cut down on transportation-related greenhouse gas emissions by providing housing in denser, more urban areas, as opposed to farther-flung regions in the state (and out of state). While no one project will solve the statewide housing crisis, the proposed development is a step in the right direction. CalHDF urges the City to approve it, consistent with its obligations under state law.

CalHDF is a 501(c)(3) non-profit corporation whose mission includes advocating for increased access to housing for Californians at all income levels, including low-income households. You may learn more about CalHDF at www.calhdf.org.

Sincerely,

Dylan Casey
CalHDF Executive Director



James M. Lloyd
CalHDF Director of Planning and Investigations

Communication from Public

Name:	Todd Nelson
Date Submitted:	05/04/2026 03:46 PM
Council File No:	26-0516
Comments for Public Posting:	On behalf of the applicant for the proposed housing development project at 3842-3852 West Roble Vista Drive, attached please find supplemental responses to the appeals of the project's haul route approval (Council Files 26-0516 and 26-0516-S1), which the City Council will consider at its May 5, 2026 meeting.

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May 4, 2026

VIA EMAIL

President Marqueece Harris-Dawson and Honorable
Members of the City Council
City of Los Angeles
200 N. Spring Street, Room 395
Los Angeles, CA 90012

clerk.cps@lacity.org

Re: Applicant Response to Haul Route Appeals for 3842-3852 West Roble Vista Drive
Council Files 26-0516 and 26-0516-S1

Dear President Harris-Dawson and Honorable City Councilmembers:

This firm represents Vista Views LLC ("Applicant"), the developer of a new mixed-income density bonus housing development project containing 27 units, three of which will be provided for very low-income households, as well as two accessory dwelling units ("Project"). The Project will be constructed at 3842-3852 West Roble Vista Drive ("Site") in the Los Feliz neighborhood of the City of Los Angeles ("City"). At its May 5, 2026, the City Council will consider two appeals of the Project's haul route, which was approved on April 7, 2026 by the Board of Building and Safety Commissioners ("BBSC"). As set forth in this letter, these appeals lack merit and should be denied, which will allow this much-needed housing project to move forward.

A. Project Summary and Overview of City Approvals.

The Project complies with all applicable zoning and development regulations under the Los Angeles Municipal Code ("LAMC") as well as State and City density bonus law;[1] accordingly, the construction of the Project's units only requires the issuance of ministerial building permits by the Los Angeles Department of Building and Safety ("LADBS"). The Project also meets all criteria to be deemed statutorily exempt from the provisions of the California Environmental Quality Act ("CEQA"), pursuant to Public Resources Code ("PRC") Section 21080.66, commonly known as the "AB 130 CEQA exemption." Under the AB 130 CEQA exemption, all aspects of an infill housing development project, including subsequent permit and other regulatory approvals, are deemed to be exempt from environmental review.

[1] Note that under State and City density bonus law, two very low income units are required to be provided; the Applicant has volunteered the Project's third very low income unit.

Due to the Site's location within a City-designated special grading area and the Project's proposed export of more than 1,000 cubic yards of earth materials, the Board of Building and Safety Commissioners ("BBSC") must review and approve a haul route for the Project pursuant to LAMC Section 91.7006.7 prior to the issuance of grading permits. Specifically, these LAMC provisions direct LADBS as well as the Departments of Transportation ("LADOT") and Public Works ("DPW") to review the Project's proposed hauling activities and identify recommended conditions pertaining to pedestrian and vehicular traffic as may be required in the interest of public health, safety, and welfare.[2]

In compliance with these requirements, the Applicant submitted a haul route application to LADBS. Staff from LADBS, LADOT, and DPW carefully reviewed the proposed scope of hauling operations as well as the existing conditions at and in the vicinity of the Site and compiled a comprehensive list of recommended conditions of approval for the Project's proposed hauling activities for the BBSC to consider. These recommended conditions included, but were not limited to, the following:[3]

- Condition C.1: restricting hauling operation hours to avoid conflicts with peak-hour traffic patterns,
- Condition C.4: specifying the maximum size of hauling trucks to be used,
- Condition C.6: requiring the placement of truck crossing signs 300 feet from the Site entrance,
- Condition C.7: requiring two radio-equipped flag attendants to facilitate haul truck movement for the duration of hauling, with one attendant located at the Site entrance and a second attendant located approximately 130 feet west along Roble Vista Drive (approximately mid-way between the Site's construction entrance and the Los Feliz Boulevard/Griffith Park Drive intersection),
- Condition C.8: requiring the installation of temporary "no parking" signs along Roble Vista Drive during hauling,
- Condition C.9: requiring the installation of temporary "temporary tow-away/no stopping" signs along Roble Vista Drive during hauling, and
- Condition C.11: prohibiting more than one haul truck being on Roble Vista Drive at any time.

On April 7, 2026, the BBSC conducted a public hearing regarding the Project's haul route, and after hearing testimony from the Applicant and a number of neighboring property owners, voted to approve the Project's haul route subject to conditions of approval that included both the recommended conditions identified above and in the staff report as well as several modified and additional conditions of approval, as discussed in more detail below.

Two neighboring property owners timely filed appeals of the BBSC's action, which the City Council will consider at its meeting of May 5, 2026. As reflected in the administrative record for the

[2] LAMC Sections 91.7006.7.2 and 91.7006.7.5.

[3] See March 4, 2026 haul route staff report to the BBSC, Board File No. 250854.

Project and the approved haul route, and as described in detail below, neither appeal provides substantial evidence of any error or abuse of discretion by the BBSC in approving the Project's haul route, nor does either appeal demonstrate any deficiency in the City's determination that the Project, inclusive of its haul route, is eligible for the AB 130 CEQA exemption.

B. The Project and Haul Route Are Fully Exempt from CEQA.

As noted above, the AB 130 CEQA exemption applies to all aspects of the Project, including its required haul route approval. This is made clear by the statutory language of the exemption itself, which states that CEQA does not apply "to ***any aspect***" of an eligible housing development project, "including ***any permits, approvals, or public improvements*** required for the housing development project." Notwithstanding this clear language, the appeals claim that environmental review should have been performed for the Project due to alleged "significant environmental sensitivities," which the appeals identify as the Site being partially located within a designated earthquake fault zone as well as within a Very High Fire Hazard Severity Zone ("VHFHSZ"). However, as described in detail below, the City has provided extensive documentation describing exactly how the Site and Project meet the criteria of the AB 130 CEQA exemption – this documentation includes the narrative prepared by the City's Planning Department that identifies each statutory criterion for the AB 130 CEQA exemption and describes how the Site and/or Project achieves compliance with each criterion, including those requirements pertaining to fault zones and the VHFHSZ.

Specifically, as the City's narrative describes, the Project will be required to comply with all applicable seismic protection building code standards under State and City building codes, which in and of itself renders the Project eligible to utilize the AB 130 CEQA exemption. Furthermore, beyond achieving this statutory compliance, LADBS has also reviewed and approved the Project's soils report, which confirms that the Site is not underlain by active fault traces.[4] Accordingly, the appeal-related concerns regarding seismic-related issues are unfounded, and the fault zone designation for a portion of the Site does not restrict application of the AB 130 CEQA exemption to the Project.

The appeal also claims that the Site's location within a VHFHSZ should render the AB 130 CEQA exemption inapplicable; this same claim states that even if applicable fire hazard mitigation measures are implemented for the completed Project buildings, this mitigation would not apply during the Project's construction period. However, as demonstrated by the extensive substantial evidence in the administrative record, these claims are not credible. As explained in the City's AB 130 CEQA exemption compliance narrative and as demonstrated by the Wildfire Mitigation Compliance Report prepared for the Project (see Attachment 1), the Project will be required to implement all applicable fire hazard mitigation measures contained in State and City codes, and therefore remains eligible to utilize the AB 130 CEQA exemption. These fire hazard mitigation measures include requirements pertaining to providing adequate fire apparatus and emergency access and staging areas, signage and building

[4] See September 16, 2024 LADBS Geology Report Approval Letter, Log #132133. Separately, LADBS has approved another soils and geology report for the Project (February 10, 2025 LADBS Geology and Soils Report Approval Letter, Log #133693) that identifies extensive measures to be implemented during grading, excavation, and shoring of the Site, including requirements to prevent damage to adjacent structures or properties during such activities, as required by LAMC Section 91.3307. These requirements will be further enhanced and made applicable to the Project in connection with the City's mandatory review and approval of a design-level geotechnical report for the Project prior to issuance of permits; collectively, these City-mandated measures will fully address claims made in the appeals regarding the potential for the Project's grading and excavation activities to affect adjacent properties.

numbering, water supply and hydrants, landscaping and fuel modification, defensible space, ignition-resistant construction, and building placement and setbacks. Contrary to the claims made in the appeal, many of these applicable fire hazard mitigation measures apply during both construction and operation of the Project, such as the measures regarding fire department and emergency access and staging areas, signage, water supply, landscaping and fuel modification, and ignition-resistant construction. Accordingly, the claims made in the appeal regarding this VHFHSZ issue fail to demonstrate any error by the City in deeming the Project to be exempt from CEQA.

The appeals also claim that, notwithstanding the Project's CEQA-exempt status, the City should have conducted a traffic and circulation analysis for the Project. However, the appellants do not, and cannot, point to any requirement under any State or City law to prepare such an analysis. Furthermore, while no such traffic and circulation analysis is required, the concerns expressed by this claim ignore the City's consideration of current traffic and circulation conditions on Roble Vista Drive and the assessment of these conditions by LADOT and DPW staff when recommending haul route conditions of approval to the BBSC. As described above, these conditions, which have been made applicable to the Project's haul route, include restrictions on parking and stopping on Roble Vista Drive during haul operations, the limitation of hauling hours, the provision of flag attendants, the prohibition of larger hauling trucks, and the prohibition of more than one truck on Roble Vista Drive at any one time during hauling. Collectively, these conditions will prevent potential vehicular and/or pedestrian conflicts on Roble Vista Drive and will facilitate a clear path of travel for haul trucks during hauling activities, which directly addresses and resolves the concerns raised by the two appeals.

C. Claims of Misrepresentation Are Unfounded

The appeals also claim that inaccurate information was provided by the Applicant to the BBSC; however, no clear evidence of such alleged inaccurate or mischaracterized information has been provided, and even if such information did exist, it would not demonstrate any deficiency in the City's review and approval of the haul route. One example of such a claim is one appellant's assertion that the width of Roble Vista Drive was misrepresented during the hearing proceedings as 26 feet instead of a narrower width of 20-21 feet; this same claim asserts that the BBSC should have considered the street as having an even narrower width of approximately 14-15 feet when on-street parking is considered. However, as demonstrated by the City's NavigateLA website, the existing right-of-way width of Roble Vista Drive is 26 feet (see Attachment 2), as correctly represented during the hearing. Further, as discussed extensively above, on-street parking will be restricted during hauling operations under the BBSC's conditions of approval; accordingly, the appellants' claim that an effective street width of only approximately 14-15 feet should have been considered by the BBSC is not relevant to the haul route as approved.

D. Request for Modifications to BBSC Conditions.

As noted above, as part of the BBSC's April 7, 2026 approval of the Project's haul route, the Commission modified several of the staff-recommended conditions. These modifications included a revision to Condition C.7, which as recommended by staff and described above, required the provision of two flag attendants. As modified by the BBSC, this Condition C.7 currently requires a third flag attendant to be provided during hauling operations, to be located at the intersection of Los Feliz Boulevard and Griffith Park Drive, only approximately 125 feet west from the second flag attendant required under Condition C.7. Another modification by the BBSC added a new Condition C.22, which

requires the provision of a pedestrian crossing guard at the Site entrance during hauling operations. The Applicant respectfully requests that, in addition to denying the two haul route appeals, the City Council restores Condition C.7 to its original form, prior to the BBSC's requirement for a third flag attendant, and deletes the newly added Condition C.22. The Applicant's explanation for each requested modification is described below.

1. Request for Modification of Condition C.7.

As described above, and as originally proposed by LADBS, LADOT, and DPW staff, Condition C.7 would require two radio-equipped flag attendants, one located at the entrance to the Site and the second located at the intersection of Roble Vista Drive and Bellota Way, approximately 130 feet west of the first flag attendant. The Applicant remains in support of providing these two attendants throughout the hauling period.

The third flag attendant required by the BBSC would be located only approximately 120 feet west of and in clear view of the second flag attendant, and would be tasked with monitoring haul route traffic entering and leaving Roble Vista from the intersection of Los Feliz Boulevard and Griffith Park Drive. However, as required by the BBSC-approved routing for the Project's haul trucks (which the Applicant is not seeking to change), all haul trucks must enter Roble Vista via a protected green-arrow left-turn lane from Los Feliz Boulevard, and must depart Roble Vista via a protected green-arrow right-turn lane onto Los Feliz Boulevard. Therefore, all existing and future vehicular traffic into and out of Roble Vista is already carefully controlled. Furthermore, all other vehicular and pedestrian traffic movements at the intersection of Los Feliz Boulevard and Griffith Park Boulevard are subject to traffic signal and pedestrian signal controls and signage, further reducing the possibility of potential conflicts for existing and future traffic volumes. In short, the Project's haul route traffic would not introduce any new or conflicting traffic patterns to this intersection, and the proposed third flag attendant at this location would not meaningfully add any enhanced traffic control value, while incurring a significant additional cost for the Applicant.

2. Request for Deletion of Condition C.22.

The Applicant also respectfully requests the deletion of Condition C.22, which the BBSC added at the haul route hearing and which requires the provision of a pedestrian crossing guard at the entrance/exit of the Site during hauling. However, there is no pedestrian sidewalk along the southern frontage of Roble Vista where the Site's construction entrance would be located, and pedestrian travel along Roble Vista is exceedingly rare. Furthermore, to the extent that a pedestrian did elect to walk on Roble Vista in the vicinity of the Site, the two flag attendants (one of whom would already be positioned at the Site entrance, with the second positioned at Bellota Way where any pedestrians walking up Roble Vista Drive would pass) would be capable of both advising the pedestrian of nearby haul truck activity and establishing radio contact with any nearby haul truck drivers to advise of the presence of a pedestrian, thereby avoiding any potential truck/pedestrian conflicts. Again, this newly added condition by the BBSC does not meaningfully address any identified issue of concern, while imposing significant costs by requiring additional, redundant personnel to be employed by the Applicant during hauling activities.

Apart from the two above-described changes, the Applicant has no other requested modifications or deletions to the conditions adopted by the BBSC.

In conclusion, the two appeals of the Project's haul route fail to demonstrate that the City erred in its determination that the Project, including its haul route and any other required permits or approvals, is fully exempt from CEQA environmental review. Furthermore, the appeals fail to establish that the City erred in any fashion when reviewing the Project's haul route activities and approving the requested haul route subject to conditions of approval. The Applicant respectfully requests that the City Council vote to deny the appeals and uphold the BBSC's haul route approval, subject to the two requested modifications of the current conditions of approval as described above. Thank you for your consideration of these requests.

Sincerely,

Todd Nelson
Partner
of RAND PASTER & NELSON, LLP

Attachments

cc: Armida Reyes, Council District 4
Miles Orr, Council District 4
Veronica Lopez, LADBS
Alan Morelos, LADBS
Valentina Knox-Jones, Department of City Planning

Attachment 1: Wildfire Mitigation Compliance Report, May 1, 2026

WILDFIRE MITIGATION COMPLIANCE REPORT

AB 130 / GOVERNMENT CODE SECTION 65913.4(a)(6)(D)
Fire Hazard Mitigation Measures Assessment
3842 West Roble Vista Drive
Los Angeles, California
6 April 2026 (Revised 1 May 2026)

SGH Project 260445

PREPARED FOR
Vista Views LLC
433 N. Camden Drive, Suite 600
Beverly Hills, CA 90210

PREPARED BY
Simpson Gumpertz & Heger Inc.
757 S. Alameda Street, Suite 440
Los Angeles, CA 90021
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APPENDICES

1. INTRODUCTION AND PURPOSE

Simpson Gumpertz & Heger Inc. (SGH) has prepared this technical report to document the results of our desktop review of the approved construction documents for the proposed 29-unit residential development at 3842 West Roble Vista Drive in Los Angeles, California (the "Project"). The purpose of this report is to evaluate whether the Project's approved plans incorporate the wildfire hazard mitigation measures referenced in Government Code Section 65913.4(a)(6)(D) for sites located in a Very High Fire Hazard Severity Zone (VHFHSZ), in support of the City of Los Angeles classification of the Project as a housing development project eligible for the statutory exemption from the California Environmental Quality Act (CEQA) under Assembly Bill 130 (AB 130) and Public Resources Code (PRC) Section 21080.66.

1.1 Statutory Context

PRC Section 21080.66, as established by AB 130 (effective 30 June 2025), provides a full statutory exemption from the provisions of CEQA for qualifying housing development projects that meet specified statutory criteria, including satisfying the locational requirements specified in Government Code Section 65913.4(a)(6). An AB 130 statutory CEQA exemption applies to all aspects of a qualifying project, including any permits, approvals, or public improvements required for the housing development project. One locational requirement identified by Government Code Section 65913.4(a)(6)(D) would restrict application of this CEQA exemption if a site is located within a VHFHSZ or State Responsibility Area (SRA); however, this restriction does not apply if the site is subject to adopted fire hazard mitigation measures in three categories.

The project's eligibility under PRC Section 21080.66 has been documented by the City of Los Angeles per Case No. ENV-2025-3598-SE; this engineering report addresses the fire hazard mitigation measures relevant to the Section 65913.4(a)(6)(D) carve-out and is not itself a CEQA exemption opinion.

1. (i) PRC Section 4291 or Government Code Section 51182 (defensible space);
2. (ii) PRC Section 4290 and its implementing regulations (development fire safety standards – access, water supply, signage, vegetation modification); and

3. (iii) The state's wildland-urban interface (WUI) building standards, currently contained in the California Wildland-Urban Interface Code (CWUIC), Title 24, Part 7 (2025 edition, effective 1 January 12026), which replaced the former California Building Code (CBC) Chapter 7A. The statute references "Chapter 7A of the California Building Code, or other applicable standards," and CWUIC Part 7 constitutes the successor provisions under the 2025 code cycle.

This report documents that the Project's construction documents and site/landscape commitments align with these three referenced mitigation-measure categories, and that those commitments are "adopted" in an enforceable manner through Los Angeles Department of Building and Safety (LADBS)-approved plans, agency clearance stamps, and operational maintenance obligations. ***This report is not a wildfire behavior analysis.*** It does not model ember exposure, simulate fire spread, or field-verify site conditions or post-construction maintenance performance. Ongoing effectiveness of wildfire mitigation measures depends on construction quality conforming to the approved documents and sustained long-term operations and maintenance (O&M) commitments, particularly for defensible space, building envelope features, and irrigation systems.

1.2 Scope and Approach

Our review is limited to a desktop evaluation of the stamped plan set to identify plan notes, specifications, and details that commit the Project to the fire hazard mitigation measures enumerated in the statute. We have reviewed the plans against the three statutory "buckets" identified above, supplemented by reference to current wildfire science regarding dominant structure ignition mechanisms and applied research from the Insurance Institute for Business & Home Safety (IBHS), the National Institute of Standards and Technology (NIST), and the USDA Forest Service (USFS). We have also evaluated the plans against applicable Los Angeles Fire Department (LAFD) and Los Angeles Municipal Code (LAMC) fire protection requirements.

"Compliance," as used in this report, means that the approved plan notes and details appear to incorporate the referenced mitigation measures and standards. It does not represent a field-verified condition, a guarantee of code compliance during or after construction, or a warranty of fire safety or survivability during a wildfire event.

1.3 Documents Reviewed

Our review was based on the following document:

- 3842 Roble Vista Dr – DCP, Zoning, DAS, Green, FLS, H&A, LID, (Partial Geo Stamp) Stamped Plans, stamped 02.27.26, prepared by Warren Techentin Architecture (wtarch), 131 sheets.

The plan set includes architectural plans (A-series: A-1.0 through A-9.13), civil/grading plans (C-series: C-1.0 through C-3.1), landscape/hardscape plans (L-series: LC-1 through LI-3; LP-1 through LP-8; LR-1 through LR-5; LT-0), plumbing riser diagrams (P-series), and related discipline drawings. The plans bear stamps from LADBS (Disabled Access Approved Plans; Grading/Access Approved Plans), the Department of Public Works Bureau of Sanitation (Stormwater Mitigation/LID – Approved with Conditions), and review stamps from relevant City agencies.

No site visit, destructive or invasive investigation, wildfire modeling or simulation, independent fire flow calculations or testing, review of LAFD correspondence beyond the approval stamps on the plan set, or testimony at hearings was performed as part of this engagement.

2. PROJECT DESCRIPTION

Based on the cover sheet (A-1.0) and plan set, the Project consists of the following:

- **Location:** 3842–3852 West Roble Vista Drive, Los Angeles, CA 90027. Tract No. 87801, Lot 11 and portions of adjacent lots, zoned RE15-1-H.
- **Fire Hazard Designation:** VHFHSZ as designated by the City of Los Angeles within the Local Responsibility Area (LRA). The VHFHSZ designation is a hazard-based classification that reflects wildfire-related factors (vegetation, terrain, weather) and does not account for fire hazard mitigation measures; this report documents the fire hazard mitigation measures required to be adopted by LADBS for the Project. Because the site is within the LRA (not the SRA), defensible space requirements are governed by Government Code Section 51182 rather than PRC Section 4291, although the Project commits to equivalent or greater measures under both provisions.
- **Occupancy and Construction Type:** Group R-2 Residential (apartments). Buildings 1 and 2 are three stories, Type V-A R-2 residential occupancy over one story Type I-S 2-A at-grade parking. Buildings 3 and 4 are two to four stories, Type V-A R-2 residential, fully sprinklered to NFPA 13 with manual fire alarm system throughout per LAMC 802 and NFPA 72.
- **Number of Units:** Twenty-nine dwelling units total (twelve one-bedroom, fifteen two-bedroom, and two two-bedroom accessory dwelling units), with a ministerial density bonus pursuant to LAMC Section 12.22 A.25.
- **Site Configuration:** Four buildings (Buildings 1 through 4) arranged on a sloped hillside site accessed via a curved private drive from Roble Vista Drive. The site includes subterranean and at-grade parking (thirty-seven required, forty-one provided), landscaped common areas, and graded slopes.
- **Total parcel area:** Approximately 31,861 sq ft. Total floor area: approximately 30,276 sq ft (per LAMC 12.22 A.25(a) calculation).

3. REGULATORY FRAMEWORK

The following statutory and regulatory provisions define the wildfire mitigation requirements applicable to the Project. This section identifies the controlling code edition, local adoption pathway, and legal nexus for each category.

3.1 Government Code Section 65913.4(a)(6)(D) – AB 130 Eligibility and Legal Nexus

As noted above, the statutory CEQA exemption provided by PRC Section 21080.66 requires compliance with the locational criteria identified by Government Code Section 65913.4(a)(6). Government Code Section 65913.4(a)(6)(D) generally restricts application of this statutory exemption when a site is located in a VHFHSZ or SRA, but this restriction does not apply if the site has adopted the fire hazard mitigation measures identified in the statute. The statute explicitly names: (i) PRC Section 4291 or Government Code Section 51182 (defensible space); (ii) PRC Section 4290 (development fire safety standards); and (iii) "Chapter 7A of the California Building Code, or other applicable standards" (ignition-resistant WUI construction).

Legal Nexus

The site is located within the City of Los Angeles VHFHSZ (LRA). The VHFHSZ constraint under Section 65913.4(a)(6)(D) does not apply because the Project has adopted fire hazard mitigation measures satisfying each of the three statutory categories: (i) defensible space commitments per Government Code Section 51182 (applicable to LRA-VHFHSZ), documented in the approved landscape and hardscape plans; (ii) development fire safety standards per PRC Section 4290 and the Title 14 State Minimum Fire Safe Regulations, documented through plan-level access, signage, and water supply provisions and evidenced by the LAFD Hydrants & Access approval stamp on the approved plans (Sheet A-2.4, Inspector Cole #441, 23 September 2025); and (iii) WUI building standards per CWUIC Part 7 (2025 edition), as successor to CBC Chapter 7A, documented in the VHFHSZ compliance note block on Sheet A-1.1B and construction details throughout the plan set. A one-page Legal Nexus Exhibit summarizing this framework is provided in Appendix A.

The purpose of this report is to document that the Project's approved construction documents commit to measures satisfying each of these three statutory categories in an enforceable way

(i.e., through LADBS-approved plans, agency clearance stamps, and operational commitments), such that the VHFHSZ constraint does not apply under Government Code Section 65913.4(a)(6)(D). The Section 65913.4(a)(6)(D) carve-out from VHFHSZ-related restrictions is incorporated by reference into PRC Section 21080.66's site-exclusion provision; the project's eligibility under PRC Section 21080.66 has been documented by the City of Los Angeles per Case No. ENV-2025-3598-SE.

3.2 Code Edition Applicability

Governing Code Edition

The Project's stamped plan set bears a stamp date of 27 February 2026. The 2025 edition of the California Building Standards Code (Title 24) became effective on 1 January 2026, as adopted by the California Building Standards Commission. Because the plan set was stamped after the effective date of the 2025 code cycle, the governing WUI building standards for this Project are those contained in the California Wildland-Urban Interface Code (CWUIC), Title 24, Part 7 (2025 edition), as adopted and amended by the City of Los Angeles through LAMC Article 7.1 (LAWUIC). The City's adoption is documented in the Los Angeles Board of Fire Commissioners report (November 2025) and implemented through LADBS supplemental plan-check correction list PC.STR.Corr.Lst.116 (Rev. 2025-12-23), which explicitly references the "2025 Edition of the California Wildland-Urban Interface Code (CWUIC)."

Legacy Code References

The stamped plan notes on Sheet A-1.1B reference CBC Chapter 7A section numbering from the 2022 code cycle (e.g., CBC 1505A, 705A.3, 706A.2, 707A.3, 708A.2.1, 709A.3). This is common for projects where plan preparation began under the prior code cycle and where the technical requirements carried forward substantially unchanged into CWUIC Part 7. This report provides cross-references between legacy CBC Chapter 7A citations used in the plans and the corresponding CWUIC Part 7 provisions. A detailed crosswalk table is provided in Appendix B.

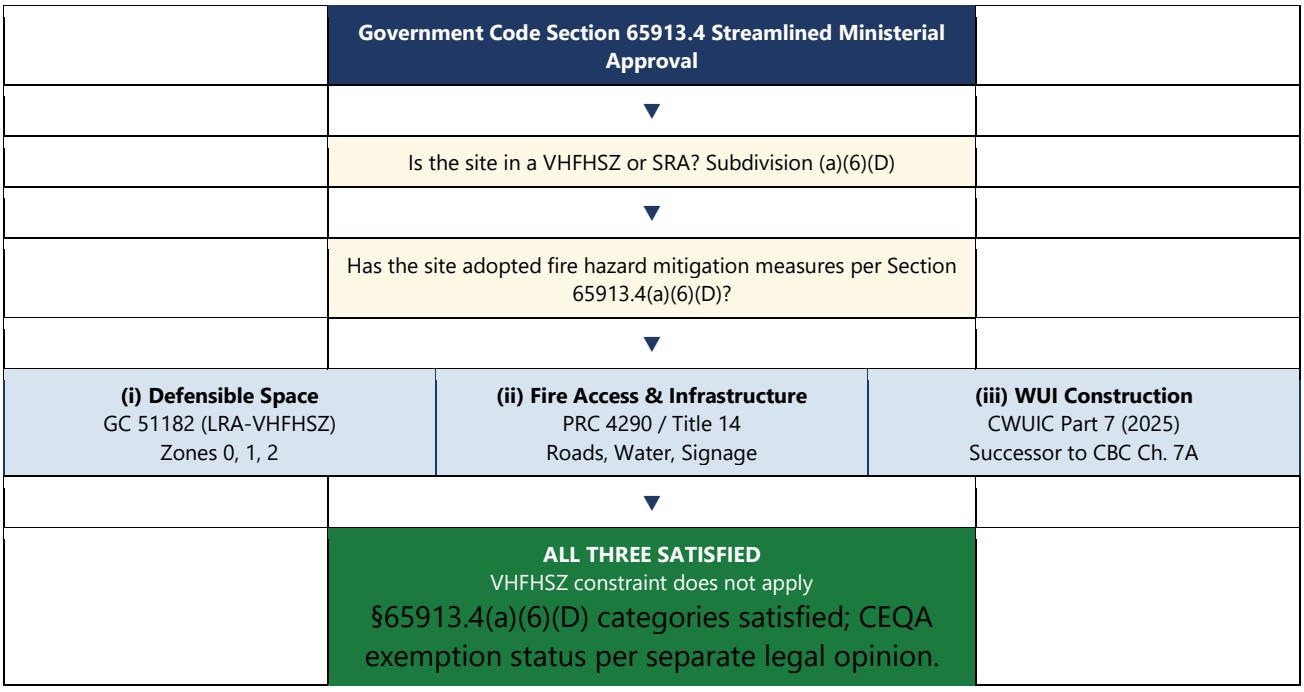


Figure 1 – The three statutory categories under Government Code Section 65913.4(a)(6)(D) are conjunctive, i.e., all three must be satisfied.

Note: The Project's compliance with each category is documented in this report; the resulting CEQA exemption qualification is the subject of separate legal analysis by counsel and is outside the scope of this engineering report.

3.3 WUI Building Standards – CWUIC (Title 24, Part 7)

Applicable ignition-resistant construction requirements are contained in the CWUIC, Title 24, Part 7 (2025 edition), effective 1 January 2026, as adopted and amended by the City of Los Angeles (LAWUIC/LAMC Article 7.1). The City's adoption of Part 7 is documented in the Los Angeles Board of Fire Commissioners report (18 November 2025), which describes the Title 24 reorganization of WUI provisions from CBC Chapter 7A, California Fire Code Chapter 49, and California Resources Code (CRC) Section R337 into a standalone CWUIC Part 7. The City implements Part 7 through LAMC Article 7.1 amendments and the LADBS supplemental plan-check correction list (PC.STR.Corr.Lst.116). The plan-sheet annotations on the stamped plans reference legacy CBC Chapter 7A section numbering in several instances; this report provides cross-references where the plan notes use prior citations (see also Appendix B).

Key CWUIC requirements for structures in a VHFHSZ address all major building envelope components, including Class A roof assemblies, ignition-resistant exterior walls, protected eaves and soffits, ember-resistant ventilation openings, tempered glazing, ignition-resistant decking, enclosed underfloor areas, roof-to-wall fire stopping, and trellis restrictions. The Project plans include a dedicated VHFHSZ compliance note block on Sheet A-1.1B with sixteen specific items addressing these requirements.

The LADBS supplemental plan-check correction list for Fire Hazard Severity Zones (PC.STR.Corr.Lst.116) explicitly references the "2025 Edition of the California Wildland-Urban Interface Code (CWUIC)" and identifies plan content expectations for topography, access road geometry, vegetation/landscape data, and ignition-resistant construction/roof classification.

3.4 PRC Section 4290 and Title 14 Fire Safe Regulations

PRC Section 4290 establishes minimum fire safety standards for development in VHFHSZ and SRA areas, with implementing regulations in Title 14, California Code of Regulations, Division 1.5, Chapter 7, Subchapter 2 ("State Minimum Fire Safe Regulations"). These regulations apply to construction within SRA and, after 1 July 2021, to development within VHFHSZ (PRC §4290(d)). The Fire Safe Regulations address four principal categories:

- **Emergency Access (Title 14, Article 2):** Road standards for safe access by emergency wildfire equipment and concurrent civilian evacuation, including minimum road width (two 10-ft traffic lanes), grade (not to exceed 16%), vertical clearance (13 ft-6 in.), and turnaround/dead-end provisions. The regulations define "road" to include access serving more than four parcels or dwelling units.
- **Signage and Building Numbering (Title 14, Article 3):** Requirements for clear identification of streets, roads, and buildings visible from public access points.
- **Water Supply and Fire Hydrants (Title 14, Article 4):** Emergency water supply reserves, fire hydrant access and specifications, and fire flow capacity. The regulations reference compliance with the California Fire Code or, where a community water system is not available, NFPA 1142 (*Standard on Water Supplies for Suburban and Rural Firefighting*).
- **Fuel Modification and Greenbelts (Title 14, Article 5):** Vegetation modification requirements, fuel breaks, and flammable vegetation disposal requirements, including setback and fuel modification zones where applicable.

Article 5 Applicability

Title 14 Article 5 addresses fuel modification, greenbelts, and setback requirements for development in SRA and VHFHSZ. For this Project, the vegetation management and fuel modification obligations arising under Article 5 are implemented through the Project's defensible space commitments (Zones 0–2, extending to 100 ft from structures or the property line, whichever is less) per Government Code Section 51182, supplemented by the LAFD 200-foot brush clearance requirement (see Section 4.7). No separate Article 5 setback analysis is required beyond the defensible space framework documented in this report.

Compliance evidence for PRC Section 4290 includes the LAFD Hydrants & Access approval stamp on the approved plans (Sheet A-2.4), which confirms LAFD review and acceptance of the Project's fire apparatus access and hydrant provisions. Fire flow confirmation will occur during the NFPA 13 sprinkler design-build permitting process, consistent with standard practice for fully-sprinklered projects on the City of Los Angeles municipal water system. Appendix C provides a quantitative access conformance worksheet comparing plan dimensions to Title 14 standards.

3.5 PRC Section 4291 and Government Code Section 51182 – Defensible Space

PRC Section 4291 (applicable in SRA) and Government Code Section 51182 (applicable in local VHFHSZ areas) establish defensible space obligations requiring maintenance of fuel modification extending up to 100 ft from structures (or to the property line, whichever is less). Because the Project site is within the City of Los Angeles LRA, Government Code Section 51182 is the directly applicable defensible space statute. The extent and type of modification depends on the structure's building materials, the location, and the type of vegetation present. The Project commits to equivalent or greater measures under both provisions.

Zone Framework

Following the 2021 amendments (AB 3074 and SB 504), defensible space is organized into three zones. **Zone 1** (5 to 30 ft) and **Zone 2** (30 to 100 ft) are established defensible space treatment zones with well-defined requirements in current guidance and practice; Zones 1 and 2 are required by law per CAL FIRE's current Ready for Wildfire guidance. **Zone 0** (0 to 5 ft, the Ember-

Resistant or "Immediate" Zone) is widely recommended by CAL FIRE, IBHS, and other authorities as pivotal for structure protection; however, statewide Zone 0 prescriptive requirements are the subject of ongoing rulemaking by the Board of Forestry and Fire Protection (BOF). The BOF's defensible space zones project page shows public workshops continuing into 2026, consistent with the timeline established by Executive Order N-18-25. CAL FIRE's current defensible space guidance states that Zone 0 is not yet legally required but is strongly recommended. Accordingly, this report treats the Project's Zone 0 commitments as an adopted design and maintenance standard that aligns with current statewide guidance and the direction of regulatory travel, rather than as a settled statewide prescriptive requirement. If Zone 0 regulations are finalized prior to certificate of occupancy, the Project should confirm that its Zone 0 commitments meet or exceed the adopted requirements.

3.6 LAFD, LAMC, and Los Angeles-Specific VHFHSZ Requirements

VHFHSZ and WUI Designation

The Project site is located in a VHFHSZ as designated by the City of Los Angeles. Under California law, the VHFHSZ designation triggers the application of the state's WUI building standards—currently contained in the CWUIC, Title 24, Part 7 (2025 edition), which replaced CBC Chapter 7A. The terms VHFHSZ and WUI describe overlapping but distinct concepts: VHFHSZ is a hazard classification reflecting wildfire-related exposure factors while WUI refers to the geographic zone where structures and wildland vegetation intermix or interface. A property in a VHFHSZ is, by definition, subject to WUI building standards. The "hillside" overlay applicable to this site under the LAMC zoning designation (RE15-1-H) addresses land use and grading requirements, but does not substitute for or supersede the VHFHSZ fire hazard requirements.

The Los Angeles Municipal Code (LAMC Sections 91.7203 and 91.7207, Fire Code Section 57.4911) imposes additional requirements for projects in the VHFHSZ, including Class A roofing assemblies, enclosed underfloor areas, ignition-resistant exterior wall assemblies, vent restrictions, LAFD apparatus access, fire alarm systems, automatic sprinkler systems, and brush clearance obligations (200 ft maintenance zone under LAMC 57.4906.5.2). The Project's approved plans reflect review and approval stamps from LADBS, indicating the plans have undergone plan review for compliance with these provisions. The City's implementation of

CWUIC Part 7 through LAMC Article 7.1 is documented in the LAFD Board of Fire Commissioners report (November 2025) and the LADBS supplemental correction list (PC.STR.Corr.Lst.116).

3.7 Local Vegetation Clearance Overlay

Reconciliation of Statewide and Local Requirements

The statewide defensible space framework under PRC Section 4291 and Government Code Section 51182 establishes fuel modification zones extending up to 100 ft from structures. However, LAFD brush clearance requirements under LAMC Section 57.4906.5.2 and related LAFD guidance impose a more stringent 200 ft vegetation management zone for structures in applicable fire hazard areas. Where the Project site is subject to LAFD's brush clearance program, the 200 ft zone controls to the extent it extends beyond the statewide 100 ft framework (or to the property line, whichever is less).

The Project's O&M framework (Section 7) incorporates the LAFD 200 ft brush clearance requirement as the controlling local standard. Property management is responsible for maintaining compliance with the LAFD annual brush clearance inspection program, which typically requires completed vegetation management by 1 June of each year. Where the 200 ft zone extends to property boundaries, coordination with adjacent property owners may be required.

4. WILDFIRE EXPOSURE CONTEXT AND IGNITION PATHWAYS

To provide appropriate context for evaluating the Project's wildfire mitigation features, this section summarizes the dominant structure ignition mechanisms in WUI fire events, drawing on research from NIST, IBHS, and the USDA Forest Service. This framing is important because the code-based mitigation measures documented in this report are designed to address specific, empirically identified ignition vulnerabilities.

4.1 Dominant WUI Structure Ignition Mechanisms

Research on WUI fire events consistently identifies three principal pathways by which structures ignite during wildfire:

1. **Ember (Firebrand) Accumulation.** Wind-borne embers are the principal driver of building ignitions in WUI fires. Embers can travel distances of one mile or more and accumulate in vulnerable building features including roof valleys, gutters, roof-to-wall intersections, decking surfaces and gaps, and other horizontal surfaces or re-entrant corners where debris collects. NIST research programs have specifically focused on quantifying firebrand exposure to improve building code tests and WUI safety standards.

2. **Ember Intrusion through Building Openings.** Embers enter structures through openings, particularly ventilation openings (attic vents, soffit vents, foundation vents, gable-end vents), gaps in building envelope assemblies, and failed or broken glazing. IBHS research has demonstrated that vent type, configuration, and orientation significantly affect ember entry, and that vents are among the most empirically studied ember intrusion pathways. Ember-resistant listed vents that have been tested and approved by the California State Fire Marshal (CSFM) provide significantly greater protection than wire mesh alone.

3. **Radiant Heat and Direct Flame Contact from Near-Structure Fuels.** Combustible materials within the immediate vicinity of a structure (vegetation, stored materials, fencing, adjacent structures, wood decking) can ignite from ember showers and expose the building to sustained radiant heat or direct flame contact. USFS research has emphasized that home ignition in WUI fires is strongly governed by the structure and its immediate surroundings—the "home ignition zone" concept—and that mitigation effectiveness is typically driven by near-home conditions (Zone 0/Zone 1) rather than more distant fuels (Cohen, 2000).

4.2 Structure-to-Structure Fire Spread

For multi-building sites such as this Project, structure-to-structure fire spread is an additional consideration. Spacing between buildings, connective fuels (landscaping, fencing, stored materials), deck adjacency, and continuity of combustible materials between structures can allow fire to propagate from one building to another. IBHS has noted ongoing research into the spacing required to reduce structure-to-structure fire spread in WUI communities. The Project's four-building site configuration necessitates attention to inter-building fuel continuity, which is addressed through the defensible space zones, hardscape design, and building separation documented in the plans.

4.3 Alignment of Code Measures to Ignition Pathways

The following table summarizes how the primary WUI code requirements—documented in the Project's plans and analyzed in Section 6—map to the dominant ignition pathways:

Table 1 – Ignition Pathway – Mitigation Measure Mapping

Ignition Pathway	Mitigation Measure	Plan Evidence / Code Basis
Ember Accumulation	Class A roof; gutter debris protection; roof-to-wall fire stopping; noncombustible Zone 0 surfaces; deck material restrictions	A-1.1B Items 1–3, 10, 14; LC-1–LC-4 hardscape; LP-1
Ember Intrusion	Ember-resistant vents (CSFM/OSFM listed); no eave/cornice vents; tempered/fire-rated glazing; fire-rated exterior doors; underfloor enclosure	A-1.1B Items 4, 8–9, 12–13; A-9.4–A-9.7 wall/vent details
Radiant Heat / Direct Flame	Ignition-resistant exterior walls; protected eaves/soffits; enclosed projections; defensible space Zones 0–2; fire-smart landscaping	A-1.1B Items 5–7, 11; LP-1–LP-8; LI-1–LI-3; defensible space notes
Structure-to-Structure	Building separation; hardscape between buildings; Zone 0/Zone 1 treatment in inter-building areas; noncombustible site features	A-2.1A site plan; LC-1–LC-4; LP-1; C-2.0–C-2.3

5. ANALYSIS AND FINDINGS

The following sections present our detailed observations regarding the Project's plans as they relate to each applicable wildfire mitigation category. For each category, we identify the relevant code or statutory requirement, the specific plan evidence observed, and any qualifications or additional considerations.

5.1 Ignition-Resistant Construction (CWUIC Part 7 / Legacy CBC Chapter 7A)

The Project plans include a dedicated VHFHSZ compliance note block on Sheet A-1.1B with sixteen specific items addressing ignition-resistant construction. The following is our item-by-item evaluation. Where plan notes reference legacy CBC Chapter 7A section numbers, we have identified the corresponding CWUIC Part 7 provisions (see also Appendix B for the full crosswalk). Appendix D provides a WUI Product Schedule identifying the applicable Office of the State Fire Marshal (OSFM) Building Materials Listing (BML) categories for key WUI-regulated components.

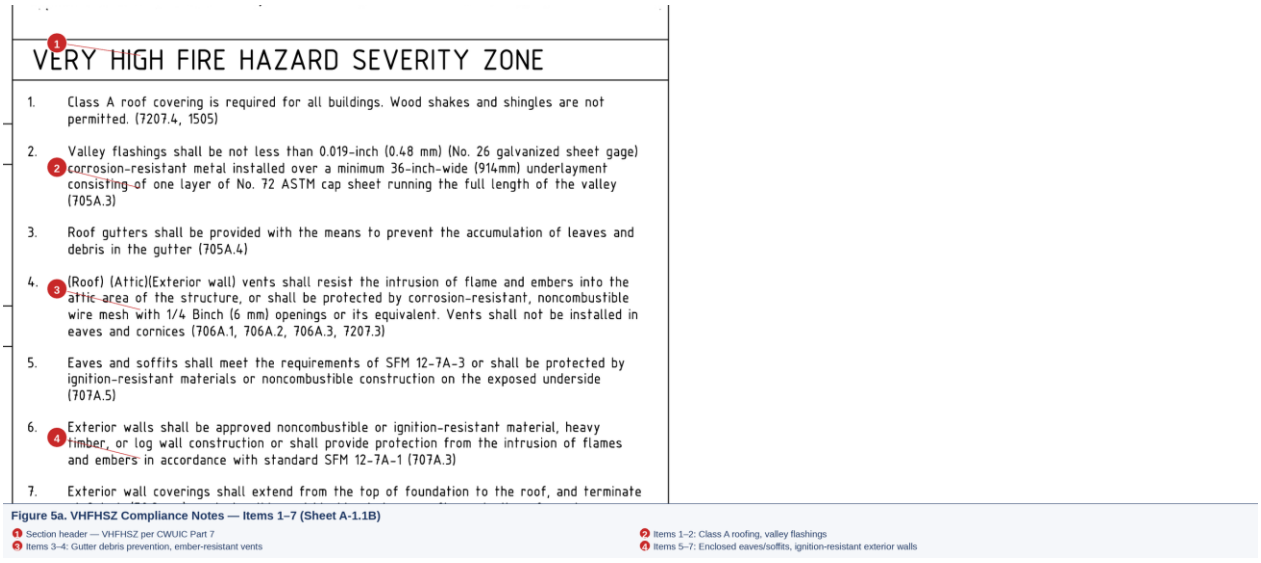


Figure 2a – VHFHSZ Compliance Notes — Items 1–7 (Sheet A-1.1B). Callouts identify: (1) VHFHSZ section header per CWUIC Part 7, (2) Class A roofing and valley flashings, (3) gutter debris prevention and ember-resistant vents, (4) enclosed eaves/soffits and ignition-resistant exterior walls.

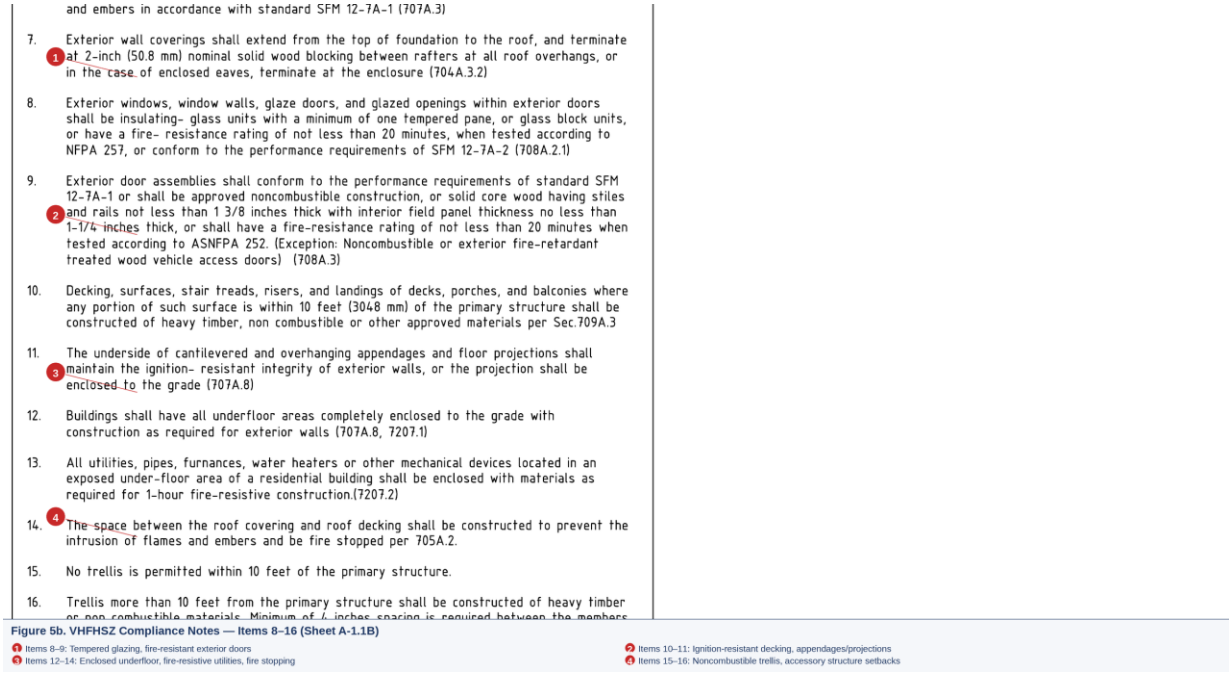


Figure 2b – VHFHSZ Compliance Notes — Items 8–16 (Sheet A-1.1B). Callouts identify: (1) tempered glazing and fire-resistant exterior doors, (2) ignition-resistant decking and appendages/projections, (3) enclosed underfloor and fire-resistive utilities, (4) noncombustible trellis and accessory structure setbacks.

5.1.1 Roof Coverings

- **Requirement:** Class A roof assembly; wood shakes and shingles prohibited in VHFHSZ (CWUIC Part 7, successor to CBC 1505A / legacy 7A).
- **Plan Evidence:** Sheet A-1.1B, Item 1 states: "Class A roof covering is required for all buildings. Wood shakes and shingles are not permitted." Roofing product specifications appear on Sheet A-1.4A (Research Reports).
- **Observation:** The plans address this requirement through both notes and product specifications. Rooftop fire-related details (noncombustible bird-stops for tile profiles, roof edge conditions, and debris traps at roof penetrations) should be verified during construction to ensure ember accumulation points are minimized consistent with IBHS Wildfire Prepared Home standards.

5.1.2 Valley Flashings

- **Requirement:** Metal valley flashings per CWUIC (legacy CBC 705A.3).
- **Plan Evidence:** Sheet A-1.1B, Item 2 specifies valley flashings "shall not be less than 0.019-inch (0.48 mm) No. 26 galvanized sheet gage corrosion-resistant metal installed over a minimum 36-inch-wide (914mm) underlayment consisting of one layer of No. 72 ASTM cap sheet running the full length of the valley."

- **Observation:** Plan notes and specifications satisfy this requirement. Valley flashings are critical ember accumulation points.

5.1.3 Roof Gutters

- **Requirement:** Gutter debris prevention (CWUIC, legacy CBC 705A.4).
- **Plan Evidence:** Sheet A-1.1B, Item 3 requires roof gutters to be "provided with the means to prevent the accumulation of leaves and debris in the gutter."
- **Observation:** This requirement is reflected in the plan set. Gutters and downspouts should be noncombustible (metal) and include noncombustible covers or screens. Gutter debris removal is an ongoing O&M obligation; see Section 7.

5.1.4 Vents

- **Requirement:** Ember- and flame-resistant ventilation openings; no vents in eaves/cornices (CWUIC, legacy CBC 706A.2, 707A.3).
- **Plan Evidence:** Sheet A-1.1B, Item 4 specifies that "(Roof)(Attic)(Exterior wall) vents shall resist the intrusion of flame and embers into the attic area of the structure, or shall be protected by corrosion-resistant, noncombustible wire mesh with 1/8-inch (3 mm) openings or its equivalent. Vents shall not be installed in eaves and cornices."
- **Observation:** The plans reference ember/flame resistance and mesh protection. IBHS ember-entry research has demonstrated that mesh-only protection provides the code minimum but may not match the performance of tested and listed ember-resistant vents. We recommend that specified vents carry OSFM Building Materials Listing (BML Category 8165) for ember resistance, or alternatively meet the prescriptive code requirements of CWUIC. See Appendix D for the WUI Product Schedule.

5.1.5 Eaves and Soffits

- **Requirement:** Protected eaves and soffits (CWUIC, legacy CBC 707A.8, SFM 12-7A-3).
- **Plan Evidence:** Sheet A-1.1B, Item 5 states that eaves and soffits "shall meet the requirements of SFM 12-7A-3 or shall be protected by ignition-resistant materials or noncombustible construction on the exposed underside." Architectural details on Sheet A-9.4 depict wall section details with boxed eave construction and stucco-clad soffits and projections (noncombustible).
- **Observation:** The plans address this requirement with both plan notes and detail drawings. The stucco soffit construction provides noncombustible underside protection.

5.1.6 Exterior Walls

- **Requirement:** Ignition-resistant or noncombustible exterior walls (CWUIC, legacy CBC 707A.3, SFM 12-7A-1); wall coverings from foundation to roof (legacy CBC 707A.3.2).

- **Plan Evidence:** Sheet A-1.1B, Items 6–7. Sheet A-9.2 shows all wall assemblies with exterior stucco cladding (noncombustible). Detail sheets A-9.4 through A-9.7 show wall section details. Research reports on Sheets A-1.4A through A-1.4D include ICC research reports for building products.

- **Observation:** The exterior walls are clad entirely in stucco, which is a noncombustible material that satisfies the CWUIC ignition-resistant exterior wall requirement through the prescriptive compliance pathway. All products are Los Angeles Research Report (LARR) approved. The noncombustible stucco exterior provides a high degree of radiant heat and direct flame resistance.

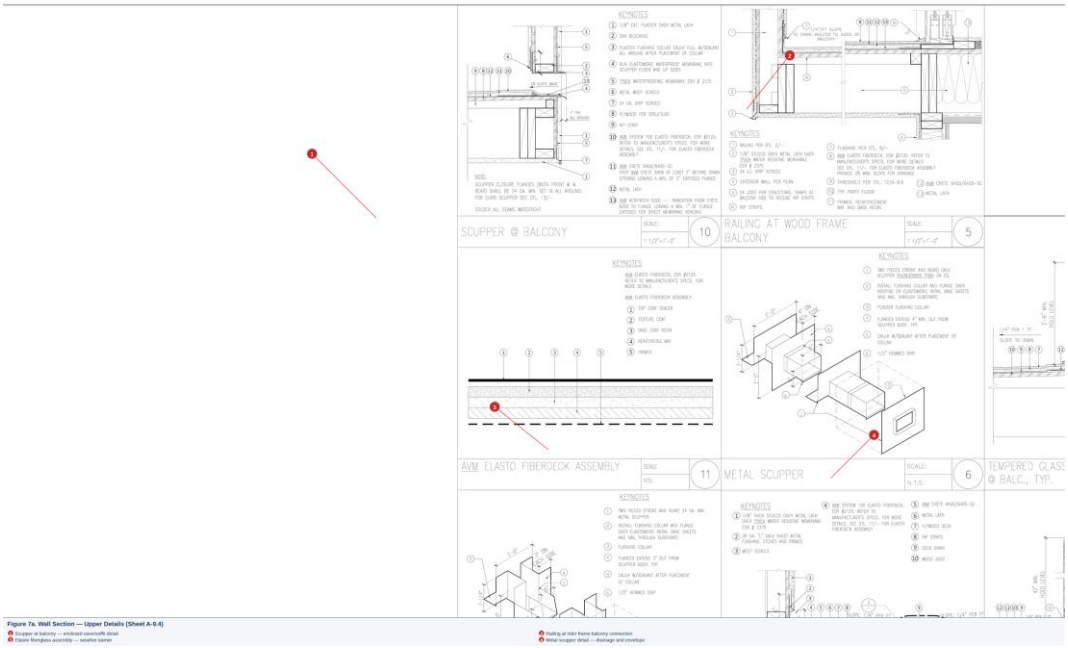


Figure 3a – Wall Section — Upper Details (Sheet A-9.4). Callouts identify: (1) scupper at balcony/enclosed eave-soffit detail, (2) railing at rider frame balcony connection, (3) elasto fiberglass weather barrier assembly, (4) metal scupper drainage and envelope detail.

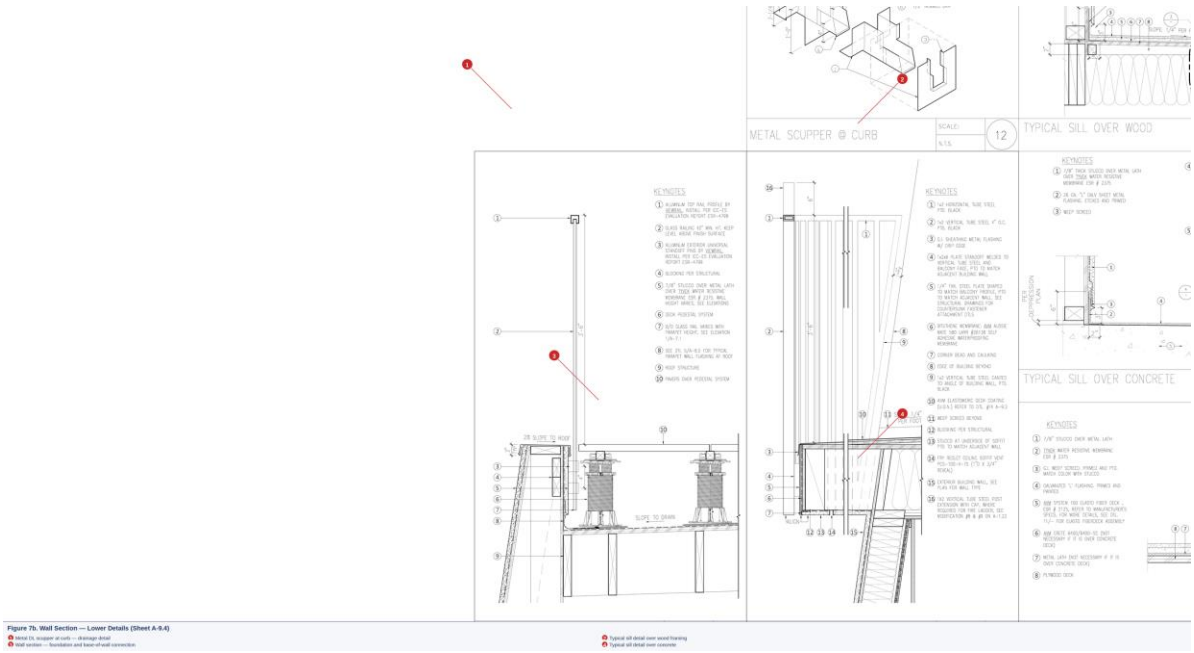


Figure 3b – Wall Section — Lower Details (Sheet A-9.4). Callouts identify: (1) metal DL scupper at curb drainage detail, (2) typical sill detail over wood framing, (3) foundation and base-of-wall connection, (4) typical sill detail over concrete.

5.1.7 Exterior Windows and Glazing

- **Requirement:** Tempered or fire-rated glazing (CWUIC, legacy CBC 708A.2.1).
- **Plan Evidence:** Sheet A-1.1B, Item 8 requires exterior windows, window walls, glaze doors, and glazed openings to "be insulating-glass units with a minimum of one tempered pane, or glass block units, or have a fire-resistance rating of not less than 20 minutes." Window schedules with material specifications are provided on Sheets A-1.10 and A-1.11.
- **Observation:** This requirement is addressed in the plan set through both the VHFHSZ compliance notes and the detailed window schedules. Window assemblies should be verified as meeting prescriptive CWUIC requirements or carrying OSFM BML listing (Category 8120) prior to installation. See Appendix D.

5.1.8 Exterior Door Assemblies

- **Requirement:** Fire-resistant exterior doors (CWUIC, legacy CBC 708A.3).
- **Plan Evidence:** Sheet A-1.1B, Item 9 specifies exterior door assemblies meeting SFM 12-7A-1 or approved noncombustible construction, or solid core wood (stiles/rails not less than 1-3/8 in. thick). Door schedules with material specifications are provided on Sheets A-1.10 and A-1.11. [Note: The plan notes reference "ASNFPA 252"; this appears to refer to NFPA 252, Standard Methods of Fire Tests of Door Assemblies.]

- **Observation:** The plans satisfy this requirement through both the VHFHSZ compliance notes and the detailed door schedules. Door assemblies should be verified as OSFM BML listed (Category 8150) or prescriptive-compliant prior to installation.

5.1.9 Decking

- **Requirement:** Ignition-resistant decking within 10 ft of the primary structure (CWUIC, legacy CBC 709A.3).
- **Plan Evidence:** Sheet A-1.1B, Item 10. Sheets A-1.3A–A-1.3B include wood decking specifications and Sheet A-1.4A includes decking product data.
- **Observation:** Plan notes and product specifications address this requirement. Decking products should be verified as OSFM BML listed (Category 8110) or prescriptive-compliant. Decking surfaces and gaps are documented ember accumulation points.

5.1.10 Cantilevered Projections

- **Requirement:** Enclosed or ignition-resistant undersides of projections (CWUIC, legacy CBC 707A.8).
- **Plan Evidence:** Sheet A-1.1B, Item 11 requires the underside of cantilevered appendages and floor projections to "maintain the ignition-resistant integrity of exterior walls, or the projection shall be enclosed to the grade."
- **Observation:** This requirement is reflected in the plan notes.

5.1.11 Underfloor Enclosure

- **Requirement:** Complete underfloor enclosure; protected utilities (CWUIC, legacy CBC 707A.8.7 and 1207.2).
- **Plan Evidence:** Sheet A-1.1B, Items 12–13.
- **Observation:** The plan set addresses this requirement through specific notes on both enclosure and utility protection.

5.1.12 Roof-to-Wall Fire Stopping

- **Requirement:** Fire stopping at roof covering/roof decking intersection (CWUIC, legacy CBC 705A.2).
- **Plan Evidence:** Sheet A-1.1B, Item 14 states "the space between the roof covering and roof decking shall be constructed to prevent the intrusion of flames and embers and be fire stopped."
- **Observation:** This requirement is addressed in the plan notes. Roof-to-wall intersections are a documented ember intrusion pathway.

5.1.13 Trellis Restrictions

- **Requirement:** Combustible trellis restrictions in VHFHSZ (LADBS Information Bulletin P/BC 2023-023, superseding P/BC 2020-023).
- **Plan Evidence:** Sheet A-1.1B, Items 15–16 restrict trellis within 10 ft of the primary structure and require trellis beyond 10 ft to be constructed of heavy timber or noncombustible materials with minimum 4 in. spacing between members.
- **Observation:** The plans incorporate trellis restrictions consistent with current LADBS requirements. The plan notes reference the prior bulletin (P/BC 2020-023); LADBS has superseded this with P/BC 2023-023 (effective 01-01-2023). The technical requirements are substantially consistent.

5.2 Fire Apparatus Access and Infrastructure (PRC Section 4290 / Title 14 Fire Safe Regulations)

The Title 14 State Minimum Fire Safe Regulations implement PRC Section 4290 and establish specific standards for emergency access, signage, water supply, and vegetation modification. The following documents our observations regarding each category.

5.2.1 Emergency Access

- **Requirement:** Roads providing safe access for emergency wildfire equipment and concurrent civilian evacuation, with minimum road width, grade, and turnaround/dead-end provisions per Title 14, Article 2. The site access serves more than four dwelling units (twenty-nine units), classifying it as a "road" under Title 14 definitions, subject to the full road standards.
- **Plan Evidence:** The civil plans (C-1.0 through C-2.3) and DAS-stamped site plans (A-2.4, A-2.5) show the site served by a curved private drive entering from Roble Vista Drive. The plans include turning radius calculations, driveway sections (A-5.1), and access geometry reviewed by the City. Sheet A-1.1A (Fire Dept. & Life Safety notes) references fire apparatus access requirements. The LAFD Hydrants & Access approval stamp on Sheet A-2.4 (Inspector Ruel Cole #441, 23 September 2025) confirms LAFD review and acceptance of the Project's access provisions.
- **Observation:** The plans depict fire apparatus access via a private drive from a public street with turning provisions. The plans have been reviewed and stamped by the City for Disabled Access and Grading, which includes access geometry review. The LAFD Hydrants & Access approval on the approved plans confirms that the Project's access and hydrant provisions satisfy LAFD requirements. The LAFD review occurs during the LADBS plan-check process; the September 2025 LAFD approval predates the final February 2026 plan stamp, consistent with the typical plan-check sequence. A

quantitative access conformance comparison is provided in Appendix C. The approved fire access plan with LADWP water pressure data is reproduced in Appendix F.

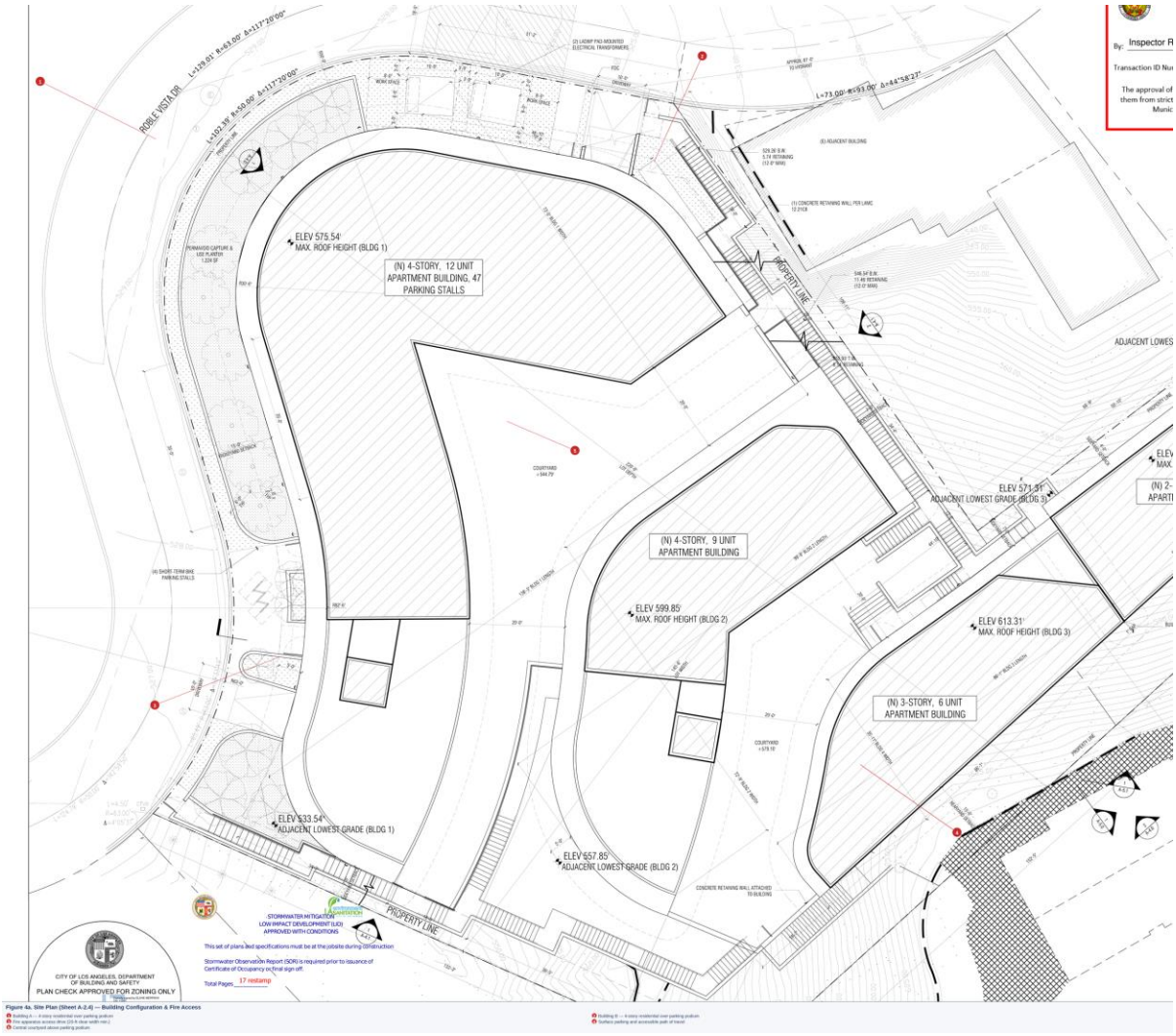


Figure 4a – Site Plan (Sheet A-2.4). Callouts identify: (1) Building A, (2) Building B, (3) fire apparatus access drive (20 ft clear width minimum), (4) surface parking and accessible path, (5) central courtyard above parking podium.

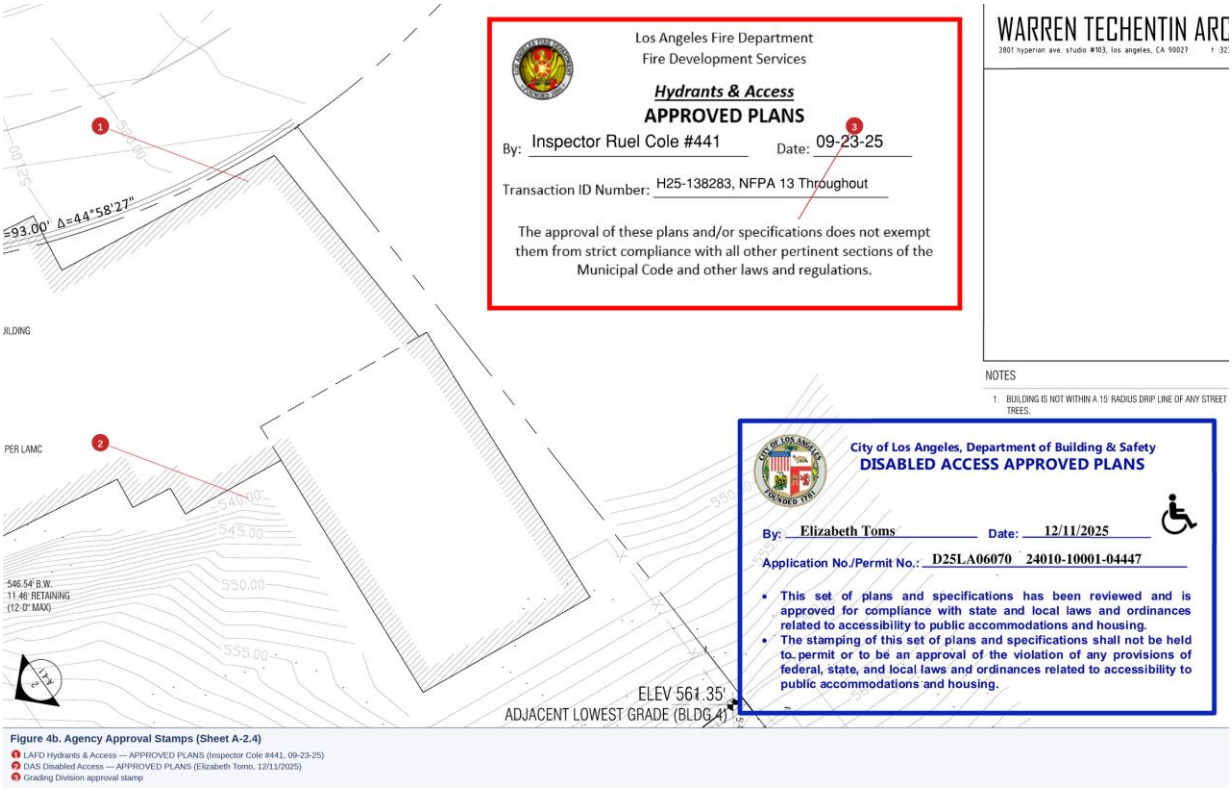


Figure 4b – Agency Approval Stamps (Sheet A-2.4). Callouts identify: (1) LAFD Hydrants & Access — APPROVED PLANS (Inspector Ruel Cole #441, 09-23-25, Transaction ID: H25-1336283, NFPA 13 Throughout), (2) DAS Disabled Access — APPROVED PLANS (Elizabeth Tomo, 12/11/2025), (3) Grading Division approval stamp.

5.2.2 Fire Department Connections and Standpipes

- **Requirement:** Fire department connections (FDC) accessible from fire apparatus access.
- **Plan Evidence:** FDC locations are identified on multiple floor plans (Sheets A-3.0 through A-3.6) and on the hardscape plans (LC-1). The FDC is located near the primary site entrance.
- **Observation:** FDC locations appear to be appropriately positioned for emergency access.

5.2.3 Water Supply, Fire Hydrants, and Fire Flow

- **Requirement:** Emergency water supply and fire hydrant access per Title 14, Article 4. Title 14 references compliance with the California Fire Code (CFC) or, where a community water system is not available, NFPA 1142.
- **Plan Evidence:** Sheet A-1.1A (Fire Dept. & Life Safety) references fire hydrant requirements and fire flow provisions. The civil plans (C-1.0) identify the connection to

the City of Los Angeles Department of Water and Power (LADWP) municipal water infrastructure. A hydrant location is identified near the site access. The LAFD Hydrants & Access approval stamp on Sheet A-2.4 (Inspector Ruel Cole #441, 23 September 2025, Transaction ID H25-1336283) confirms LAFD review and acceptance of the Project's hydrant and access provisions. The LAFD stamp specifically notes "NFPA 13 Throughout."

- **Observation:** The LAFD Hydrants & Access stamp on the approved plans serves as the access and hydrant clearance for this ministerial project. The plans connect to the LADWP municipal water system, establishing a CFC compliance pathway (rather than an NFPA 1142/alternate supply pathway).

LADWP Water Pressure Data

LADWP Central District Engineering (Water Distribution Standards Unit) has provided static pressure data for the project site as documented on the approved fire access plan (Sheet A-2.4; reproduced in Appendix F). The approximate static pressure values are:

- High: 107 PSI
- Low: 77 PSI
- Elevation: Approximately 529 ft above mean sea level

These pressure values, provided by LADWP, indicate available municipal water pressure at the project site. Fire flow adequacy for the NFPA 13 sprinkler system will be confirmed through the sprinkler design-build process using these baseline pressure values. The availability of LADWP pressure data on the approved fire access plan strengthens the water supply documentation for this project.

Fire Flow Confirmation

All buildings in this Project are fully sprinklered to NFPA 13. Consistent with standard practice for fully-sprinklered residential projects on the LADWP municipal water system, fire flow confirmation will occur during the NFPA 13 sprinkler design-build permitting process. Sprinkler permits for this project type are design-build, meaning they are applied for and approved through the sprinkler installer during the construction phase. Fire flow adequacy is confirmed as part of that process; if site-specific flow or pressure improvements are required, they are addressed at that time. The LAFD Hydrants & Access approval on the plan set provides

preliminary acceptance of the Project's water supply provisions and confirms LAFD's review of hydrant spacing and access. The California Attorney General's wildfire CEQA guidance identifies baseline water supply for firefighting as a critical consideration; this design-build fire flow confirmation process is the standard mechanism by which fire flow adequacy is documented for LADWP-served projects in Los Angeles.

Fire Flow Record Documentation

When fire flow confirmation is obtained during the sprinkler design-build process, the following documents should be maintained in the permanent Project record:

- **NFPA 13 Sprinkler Hydraulic Calculations:** Confirming design demand and available supply at the project site.
- **Fire Flow Test Results/LADWP Documentation:** Hydrant flow test report or LADWP will-serve letter confirming available flow and pressure.
- **Sprinkler Permit Approval:** LAFD/LADBS approval of the sprinkler system design, confirming adequacy of the water supply.

These documents will be generated during the construction-phase sprinkler design-build process. Retain in the permanent Project file alongside the LAFD Hydrants & Access stamp already on the approved plans.

5.2.4 Building Numbering and Signage

- **Requirement:** Clear identification of streets, roads, and buildings per Title 14, Article 3.
- **Plan Evidence:** Sheet A-1.1A references address identification requirements compliant with LAFD standards. The plans include building and unit numbering.
- **Observation:** Building numbering and address signage are addressed in the plan set consistent with LAFD requirements.

5.2.5 Site-Specific Access and Safety Enhancements

The Project includes several site design features that provide access and wildfire safety benefits beyond the minimum code requirements:

- **LADWP Staging Area and Additional Turnaround:** The site plan includes a dedicated LADWP staging area which, once constructed, can support an additional fire apparatus

turnaround location, improving operational flexibility for emergency response beyond the primary turnaround provisions shown on the approved plans.

- **Building Setback and Effective Road Width:** The building facades are set back approximately 10 ft from the property line. This setback, combined with the roadway width, significantly increases the effective clear width along the access drive compared to the existing condition, where a sheer slope face is located at the property line. The resulting visual and functional road width improvement benefits both emergency access and civilian evacuation.

- **On-Site Parking and Street Clearance:** The Project provides two levels of parking (thirty-seven required, forty-one provided), with all parking accommodated on-site in subterranean and at-grade structures. No on-street parking is expected, which preserves the full width of Roble Vista Drive and the private access drive for emergency vehicle access and evacuation—a meaningful benefit in hillside VHFHSZ areas where street parking frequently impedes fire apparatus access.

- **Construction-Phase Staging and Access:** The construction staging plans concentrate the bulk of turnaround operations on-site, allowing regular access for residents living beyond the project site during the construction period.

- **Post-Construction Fire Safety Improvement:** The existing site is characterized by undeveloped grasses and trees that represent a significant existing fuel load. Replacement of this vegetation with the Project's noncombustible building materials, hardscape surfaces, and managed defensible space landscaping will substantially reduce the site's fire exposure contribution to the surrounding neighborhood. In this respect, the Project represents a net improvement in local wildfire safety conditions compared to the existing undeveloped parcel.

5.3 Defensible Space (PRC Section 4291 / Government Code Section 51182)

5.3.1 Defensible Space Zone Designations

The landscape and hardscape plans include explicit defensible space zone designations on multiple sheets, including the ground floor plans (A-3.0 area) and landscape plans. The designations are consistent with the three-zone framework in current statewide guidance:

- **Zone 0 (0 to 5 ft, Immediate Zone) – Adopted Project Commitment:** The plans state: "No combustible materials: Keep the first 5 feet around buildings and decks free of anything that can ignite (wood mulch, lumber, propane tanks, firewood, etc.). Use noncombustible surfaces (concrete, gravel, stone). Only plant low-growing, fire-resistant vegetation (succulents, irrigated groundcover)." This commitment aligns with current statewide guidance and the direction of ongoing Zone 0 rulemaking (see Section 4.5). The Project's adoption of Zone 0 standards through its approved plans represents a voluntary commitment exceeding current enforceable minimums.

- **Zone 1 (5 to 30 ft, Lean, Clean, and Green Zone):** The plans state: "Remove dead vegetation, leaves, pine needles, and combustible debris. Space trees at least 10 feet from structures, branches pruned 6 feet above ground (or 1/3 tree height if smaller). Maintain separation between shrubs and trees so fire cannot 'ladder' upward. Lawns, if present, should be well-irrigated or replaced with fire-resistant landscaping."

- **Zone 2 (30 to 100 ft, Reduced Fuel Zone):** The plans state: "Break up continuous areas of shrubs or brush. Maintain horizontal spacing: 4x height of shrub to nearest tree (if shrubs <2 ft), 2x height of shrub if taller. Maintain vertical spacing: 6 feet or more between ground and tree canopy. Cut annual grasses/weeds to 4 inches or less. Thin trees so canopies are separated by 10–30 feet depending on slope." The plans note that "if property line is closer than 100 feet, owners must still do what they can up to the boundary."

Figure 5a – Planting Plan — Defensible Space Zones (Sheet LP-1). Callouts identify: (1) Zone 0 noncombustible hardscape (0–5 ft from structure), (2) defensible space zone boundary (red dashed line), (3) building footprint with landscape setbacks, (4) property line and fuel modification zone extent.

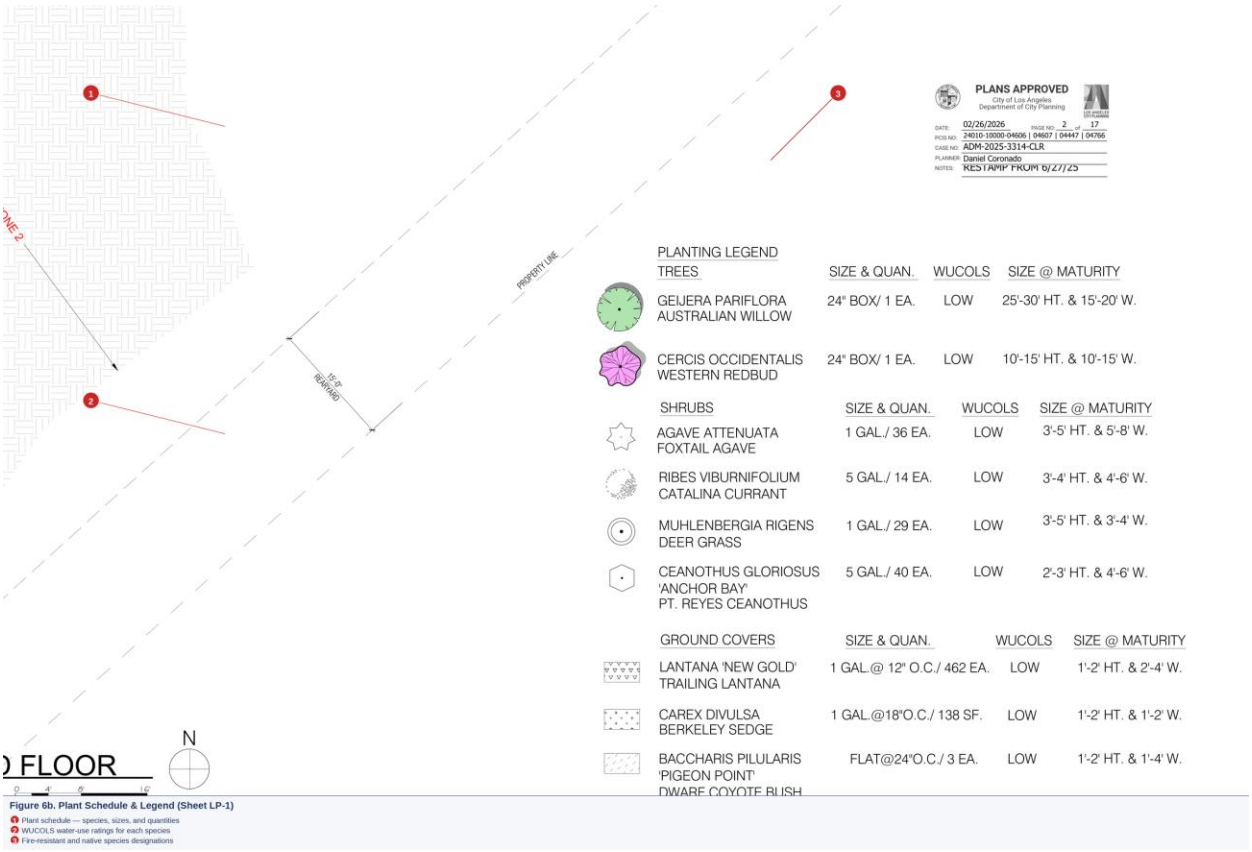


Figure 5b – Plant Schedule & Legend (Sheet LP-1). Callouts identify: (1) plant schedule with species, sizes, and quantities, (2) WUCOLS water-use ratings for each species, (3) fire-resistant and native species designations.

5.3.2 Fire-Smart Landscaping

- **Landscape Design Approach.** The planting plans (LP-1 through LP-8) show species selection intended to support defensible space objectives. The ground floor planting plan (LP-1) shows predominantly hardscape and low-growing groundcover within the Zone 0 boundary. The hardscape plans (LC-1 through LC-4) show noncombustible paving materials (concrete, stone pavers) within the immediate zone around building perimeters.

- **Plant Combustibility Caveats.** The plant palette includes species such as *Cercis occidentalis* (Western Redbud), *Geranium incanum, Agave attenuata,* and *Rosmarinus officinalis* (rosemary). ***No plant species is noncombustible, and plant combustibility depends substantially on maintenance, irrigation, and drought stress rather than species selection alone.*** UC Extension guidance explicitly cautions against treating "firewise plants" as a simple label. The Project's wildfire mitigation posture should prioritize: (a) spacing between plantings and structures; (b) irrigation reliability; (c) regular removal of dead plant material and debris; (d) avoidance of volatile-oil, resinous, or fine-fuel-dense shrubs within Zone 0; and (e) Zone 0 hardscape

dominance. This maintenance-first, "fire-smart landscaping" approach is consistent with current CAL FIRE guidance.

5.3.3 Irrigation

- **Plan Evidence:** The irrigation plans (LI-1 through LI-3) demonstrate irrigated landscape zones with pressure mainline distribution, automatic irrigation controllers, and hydrozone planning (LI-1A, LI-2A). An irrigation maintenance schedule appears on Sheet LT-0.
- **Observation:** Maintained irrigation supports reduced plant flammability where properly functioning. Drought stress increases flammability risk. Irrigation system reliability is a critical long-term O&M obligation for wildfire mitigation effectiveness.

5.3.4 LAFD Brush Clearance Compliance

As noted in Section 4.7, the LAFD 200 ft brush clearance requirement under LAMC Section 57.4906.5.2 constitutes a local overlay that is more stringent than the statewide 100 ft defensible space framework. The Project's O&M framework (Section 7) incorporates the 200 ft standard and assigns responsibility for annual compliance with the LAFD brush clearance inspection program.

5.4 LAFD and LAMC Fire Protection Features

5.4.1 Automatic Sprinkler System

- **Plan Evidence:** The cover sheet (A-1.0) states all buildings are equipped with an automatic sprinkler system complying with NFPA 13. The sprinkler system will be permitted through the design-build process, with the sprinkler contractor applying for and obtaining permits during the construction phase. Fire flow adequacy and hydraulic calculations will be confirmed as part of the sprinkler design-build permitting process.
- **Observation:** Full NFPA 13 sprinkler protection provides robust interior fire suppression. The design-build sprinkler permitting process is the standard mechanism for confirming fire flow adequacy for fully-sprinklered residential projects on the LADWP municipal water system. However, wildfire performance of sprinklers depends on reliable water supply and pressure, which can be compromised during wildfire events affecting municipal infrastructure. Interior sprinklers do not substitute for envelope hardening and defensible space. FEMA guidance similarly notes water supply reliability as a critical factor.

5.4.2 Fire Alarm System

- **Plan Evidence:** The cover sheet requires an automatic fire alarm system per LAMC 802 and NFPA 72 with occupant notification, emergency responder radio coverage per LAFD 5.19, and monitoring per CFC 901.6.3 and 907.6.5.
- **Observation:** Fire alarm and notification requirements are addressed in the plan set.

5.4.3 Egress, Evacuation, and Access Operational Controls

- **Plan Evidence:** Sheets A-1.1A and A-1.1B include detailed egress, stairway, and exit signage requirements. Multiple stairways are provided in each building. The site design provides for vehicular and pedestrian egress via the internal drive to Roble Vista Drive.
- **Observation:** The plans address code-required means of egress for building fire scenarios. Wildfire evacuations differ from building-fire egress; they involve area-wide conditions including traffic, smoke, road closures, and phased timing that building-level design does not address.

Access Operational Controls

To support the intent of Title 14's ingress/egress provisions and wildfire evacuation safety, the O&M framework (Section 7) includes access road operability commitments: no-parking zones along fire apparatus access roads, signage and marking of fire lanes, and tow authorization procedures during Red Flag Warning conditions. These controls directly support both the Title 14 access purpose and the CEQA wildfire checklist (evacuation plan impairment) if a discretionary analysis is ever required.

5.4.4 Fire Extinguishers

Fire extinguisher locations are identified on floor plans throughout the plan set (Sheets A-3.0 through A-3.15), consistent with LAMC and NFPA requirements for Group R-2 occupancies.

6. OPERATIONS AND MAINTENANCE FRAMEWORK

Wildfire mitigation is a performance-by-maintenance proposition. The code-based construction measures documented in this report establish baseline protection at the time of construction, but their ongoing effectiveness depends on sustained O&M commitments. This is particularly important for a multifamily residential project where maintenance responsibilities are institutional (property management/homeowner's association) rather than individual homeowner-driven.

Because this Project was approved ministerially (without discretionary entitlement conditions), the long-term enforceability of O&M commitments depends on the instrument that binds future property owners. We recommend the following O&M commitments be documented in recorded covenants, conditions, and restrictions (CC&Rs) or an equivalent recorded maintenance agreement that runs with the property. CC&Rs for this Project have not yet been drafted; the Project team should ensure that the wildfire mitigation O&M obligations identified below are incorporated into the CC&Rs before recordation. The responsible party for each commitment is the property manager or homeowner's association (HOA); corrective action timelines are included to align with LAFD brush clearance inspection standards.

- **Zone 0 Housekeeping (Ongoing; fourteen-day corrective action):** Regular inspection and maintenance of the 0 to 5 ft noncombustible zone around all buildings and decks, including removal of combustible debris, stored materials, and accumulated vegetation. No combustible items (furniture, planters with combustible media, firewood, propane tanks) to be stored within Zone 0. Corrective action for Zone 0 combustible accumulations: fourteen calendar days from identification.
- **Gutter and Roof Debris Removal (Seasonal/Ongoing; thirty-day corrective action):** Regular cleaning of roof gutters, valleys, and roof-to-wall intersections to remove accumulated leaves, needles, and debris. Verification that gutter screens/covers remain intact and functional.
- **Vent Screening Integrity (Annual; thirty-day corrective action):** Annual inspection of all exterior ventilation openings to verify ember-resistant screens/vents are intact, undamaged, and free of debris or biological blockage (bird nests, insect debris).
- **Defensible Space Maintenance (Zones 1–2, Seasonal; thirty-day corrective action):** Regular vegetation management within defensible space zones, including removal of dead vegetation and debris, pruning to prevent ladder fuels, and maintenance of required spacing between shrubs, trees, and structures.

- **LAFD Brush Clearance (Annual; by 1 June):** Compliance with LAFD annual brush clearance inspection program. Vegetation management within the 200 ft brush clearance zone (LAMC 57.4906.5.2) must be completed by 1 June of each year. Where the clearance zone extends to property boundaries, coordinate with adjacent owners. Maintain documentation of compliance for LAFD inspection.

- **Irrigation System Reliability (Ongoing; seven-day emergency repair):** Regular testing and maintenance of the automatic irrigation system. Drought-stressed vegetation has significantly increased flammability; irrigation system failures should be treated as a wildfire mitigation deficiency requiring repair within seven calendar days.

- **Landscaping Condition Monitoring (Ongoing):** Monitoring of plant health and removal of dead material, with particular attention to volatile-oil or fine-fuel-dense species near structures. Replacement plantings should follow fire-smart landscaping principles.

- **Building Envelope Integrity (Annual; thirty-day corrective action):** Annual inspection of exterior wall coverings, eave/soffit protection, window/door seals, and deck surfaces for damage, deterioration, or gaps that could allow ember intrusion.

- **Access Road Operability (Ongoing):** Maintain fire apparatus access roads and turnarounds free of obstructions. Maintain no-parking signage and fire lane marking. Tow authorization procedures during Red Flag Warning conditions.

- **Water Supply Reliability Awareness (Ongoing):** Municipal water supply and pressure can be compromised during wildfire events due to system-wide demand, power outages affecting pump stations, or infrastructure damage. The property manager should maintain awareness of LADWP service advisories during fire weather events, verify that FDCs and standpipe systems remain accessible and operable, and confirm that the automatic sprinkler system is in service. Municipal water system redundancy and backup power for pump stations are the responsibility of the water utility (LADWP) and are outside the scope of this Project's O&M framework.

- **Inspection Documentation.** The property manager or HOA should maintain a written inspection log documenting: inspection date, inspector name, areas inspected, deficiencies identified, corrective actions taken, and completion dates. This log supports enforceability under LAFD brush clearance inspection standards and requirements. The IBHS Wildfire Prepared Home Technical Standard is explicit that designation-level wildfire resilience requires ongoing reviews and maintenance, not just initial construction compliance.

7. COMPLIANCE MATRIX

WUI Construction (CWUIC Part 7)	Fire Access (PRC 4290)	Defensible Space (GC 51182/PRC 4291)	LAFD / LAMC Fire Protection
13 of 13	**4 of 4**	**4 of 4**	**5 of 5**
INCORPORATED	INCORPORATED	INCORPORATED	INCORPORATED

Figure 6 – All 26 compliance items across four statutory categories are incorporated in the approved plan set. Items marked with an asterisk (*) in the detailed matrix indicate where additional verification is recommended.

Table 2 summarizes our observations regarding the Project's apparent compliance with the applicable wildfire mitigation requirements, cross-referenced to specific plan sheets and details.

Table 2 – Compliance Summary

Category	Requirement	Plan Reference	Observation	Status
CWUIC/7A	Class A roof; no wood shakes (1505A)	A-1.1B Item 1; A-1.4A–D	Class A required; wood prohibited. ICC reports confirm WUI compliance.	Incorporated
CWUIC/7A	Valley flashings (705A.3)	A-1.1B Item 2	26-ga metal over 36-in. cap sheet.	Incorporated
CWUIC/7A	Gutter debris protection (705A.4)	A-1.1B Item 3	Debris prevention required. Confirm NC gutters/covers.	Incorporated
CWUIC/7A	Ember-resistant vents (706A, 707A.3)	A-1.1B Item 4	Ember/flame resistance; recommend OSFM BML Cat. 8165.	Incorporated*
CWUIC/7A	Eaves/soffits protected (707A.8)	A-1.1B Item 5; A-9.4	Stucco soffits/projections (NC) per A-9.4 details.	Incorporated
CWUIC/7A	IR exterior walls (707A.3)	A-1.1B Items 6–7; A-9.2; A-9.4–9.7	Exterior stucco (NC); all wall assemblies NC per A-9.2.	Incorporated
CWUIC/7A	Tempered glazing (708A.2.1)	A-1.1B Item 8; A-1.10–1.11	Window schedule on A-1.10–1.11. Min. one tempered pane or 20-min. rating.	Incorporated
CWUIC/7A	Exterior door assemblies (708A.3)	A-1.1B Item 9; A-1.10–1.11	Door schedule on A-1.10–1.11. Solid core 1-3/8 in. or 20-min. rating.	Incorporated
CWUIC/7A	IR decking (709A.3)	A-1.1B Item 10; A-1.3A–B	Heavy timber/NC within 10 ft. BML Cat. 8110.	Incorporated
CWUIC/7A	Cantilevered projections (707A.8)	A-1.1B Item 11	Underside IR integrity or enclosed to grade.	Incorporated

Category	Requirement	Plan Reference	Observation	Status
CWUIC/7A	Underfloor enclosure (707A.8.7)	A-1.1B Items 12–13	All underfloor enclosed; utilities in 1-hr enclosure.	Incorporated
CWUIC/7A	Roof-to-wall fire stopping (705A.2)	A-1.1B Item 14	Ember/flame intrusion prevention at roof/wall junction.	Incorporated
CWUIC/7A	Trellis restrictions (P/BC 2023-023)	A-1.1B Items 15–16	No trellis <10 ft; heavy timber/NC beyond. Superseded bulletin noted.	Incorporated*
PRC 4290	Emergency access (Title 14 Art. 2)	A-1.1A; C-1.0–C-2.3; A-5.1	Private drive with turning. DAS-stamped. See Appendix C.	Incorporated*
PRC 4290	Fire department connections	A-3.0–3.6; LC-1	FDC near primary entrance.	Incorporated
PRC 4290	Water supply / hydrants (Title 14 Art. 4)	A-1.1A; C-1.0; A-2.4	LADWP municipal system. LAFD H&A stamp obtained. Fire-flow via sprinkler design-build.	Incorporated
PRC 4290	Building numbering / signage (Art. 3)	A-1.1A	Address ID per LAFD.	Incorporated
GC 51182	Zone 0: Ember-Resistant (0–5 ft)	LC-1–LC-4; LP-1	NC surfaces; no combustibles. Voluntary commitment.	Adopted*
GC 51182	Zone 1: Lean/Clean/Green (5–30 ft)	LP-1–LP-6	Dead veg removal; tree spacing; ladder fuel prevention.	Incorporated
GC 51182	Zone 2: Reduced Fuel (30–100 ft)	LP-1	Shrub/brush spacing; canopy clearance. To property line.	Incorporated
GC 51182	Irrigated landscape O&M	LI-1–3; LT-0	Automatic irrigation; hydrozone planning; maintenance.	Incorporated
LAFD/LAMC	Sprinkler system (NFPA 13)	A-1.0 Fire Notes	All buildings sprinklered. Water supply caveat.	Incorporated
LAFD/LAMC	Fire alarm (LAMC 802, NFPA 72)	A-1.0 Fire Notes	Auto fire alarm; occupant notification; monitored.	Incorporated
LAFD/LAMC	Emergency responder radio	A-1.0 Fire Notes	Coverage per LAFD 5.19.	Incorporated
LAFD/LAMC	Fire extinguishers	A-3.0–3.15	Locations throughout all buildings.	Incorporated
LAFD/LAMC	Egress / stairways	A-1.1A–1.1B; A-8.0–8.4	Multiple stairways; exit signage.	Incorporated

Abbreviations: NC = noncombustible; IR = ignition-resistant; CSFM/OSFM = California State/Office of the State Fire Marshal; HAU = Hydrant and Access Unit; O&M = operations and maintenance; BML = Building Materials Listing.
** "Incorporated*" indicates the plan set addresses the requirement through notes/details, but additional verification (e.g., OSFM BML listing, updated bulletin reference, or construction-phase confirmation) is recommended. "Adopted*" indicates a voluntary Project commitment aligning with current guidance and direction of rulemaking, not a settled prescriptive requirement.*

8. LIMITATIONS AND QUALIFICATIONS

This report is based solely on a desktop review of the stamped plan set identified in Section 2. Our review did not include:

- A site visit or field observation of existing conditions
- Destructive or invasive investigation of materials or assemblies
- Wildfire behavior modeling, ember transport simulation, or fire spread analysis
- Independent fire-flow calculations, testing, or water supply analysis
- Review of LAFD correspondence or agency documentation beyond the approval stamps included on the plan set
- Testimony at hearings or regulatory proceedings
- Evacuation capacity modeling or operational parking analysis for wildfire evacuation scenarios

Our opinions address whether the approved plans appear to incorporate the fire hazard mitigation features referenced in the applicable statutes and standards. We have not independently verified field conditions, confirmed that construction will match the approved plans, or evaluated the adequacy of any specific product, assembly, or system beyond confirming its general consistency with the referenced code provisions. The plans bear stamps from LADBS and other reviewing agencies, indicating that the plans have undergone plan review for code compliance.

This report does not constitute a guarantee or warranty of fire safety or survivability during a wildfire event. Wildfire behavior depends on weather, terrain, vegetation, suppression resources, and long-term maintenance—all of which are beyond the control of building design. Ongoing effectiveness of the measures documented herein depends on construction quality conforming to the approved plans and sustained O&M performance as described in Section 7.

- **Defensible Space vs. Landscape-Scale Fuel Treatments.** This report addresses parcel-level and near-structure defensible space measures. It does not evaluate landscape-scale fuel treatments (mechanical thinning, prescribed fire, grazing, fuel breaks) in the surrounding area, which are outside the Project's control.

- **Not a CEQA Wildfire Analysis.** As the proposed project has been determined to be statutorily exempt from CEQA, this report does not provide a CEQA environmental impact analysis of potential wildfire-related impacts. Instead, the report documents the relevant wildfire mitigation measures that have been made applicable to the project under the identified statutory schemes.

9. CONCLUSIONS

Based on our desktop review of the approved stamped plan set for the proposed 29-unit residential development at 3842 West Roble Vista Drive in Los Angeles, California, we offer the following conclusions:

- **WUI Building Standards (CWUIC Part 7, successor to CBC Chapter 7A):** The plans include a dedicated VHFHSZ compliance note block (Sheet A-1.1B) with sixteen specific items addressing ignition-resistant construction for all building components. Architectural details on the A-9 series sheets provide construction details consistent with these requirements. The plan notes use legacy CBC Chapter 7A section numbering in some instances; the technical requirements are consistent with the current CWUIC Part 7 provisions effective in 2026 (see Appendix B for crosswalk). A WUI Product Schedule (Appendix D) identifies applicable OSFM BML categories for verification.

- **PRC Section 4290 (Fire Access and Infrastructure / Title 14 Fire Safe Regulations):** The plans depict fire apparatus access via a private drive from Roble Vista Drive with turning provisions, fire department connections near the primary entrance, connection to LADWP municipal water infrastructure, and building numbering consistent with LAFD standards. The LAFD Hydrants & Access approval stamp on Sheet A-2.4 confirms LAFD review and acceptance of the Project's access and hydrant provisions. Fire-flow confirmation will be obtained during the NFPA 13 sprinkler design-build permitting process, consistent with standard practice for fully-sprinklered projects on the LADWP system. A quantitative access conformance worksheet (Appendix C) compares plan dimensions to Title 14 standards.

- **PRC Section 4291 / Government Code Section 51182 (Defensible Space):** The plans incorporate explicit defensible space zone designations consistent with the three-zone framework. Zone 0 (0 to 5 ft) is adopted as a voluntary Project commitment aligned with current statewide guidance and ongoing rulemaking. Zones 1–2 are addressed through landscape design, planting plan, and defensible space notes. The LAFD 200 ft brush clearance requirement is reconciled with the statewide framework in Section 4.7.

- **LAFD / LAMC Fire Protection:** The plans incorporate fire protection features including full NFPA 13 sprinklers throughout, automatic fire alarm with occupant notification, emergency responder radio coverage, fire extinguishers, and multiple means of egress. Access operational controls are incorporated in the O&M framework (§7).

In summary, the Project's approved plans incorporate all three categories of fire hazard mitigation measures required under Government Code Section 65913.4(a)(6)(D).

In our opinion, based on the documents reviewed, the Project's approved construction documents incorporate the fire hazard mitigation measures referenced in Government Code

Section 65913.4(a)(6)(D), including the WUI building standards of CWUIC Part 7 (successor to CBC Chapter 7A) as adopted by the City of Los Angeles, the fire access and infrastructure standards of PRC Section 4290 and the Title 14 Fire Safe Regulations, and the defensible space requirements of Government Code Section 51182 (applicable to the Project's LRA-VHFHSZ site). These measures are adopted through approved plans and should be supplemented by the Operations and Maintenance commitments described in Section 7 to maintain their effectiveness over time. This report demonstrates that the Project's approved construction documents incorporate the fire hazard mitigation measures referenced in Government Code Section 65913.4(a)(6)(D), satisfying each of the three statutory categories. The project's eligibility under PRC Section 21080.66 has been documented by the City of Los Angeles per Case No. ENV-2025-3598-SE.

10. REFERENCES

The following references were consulted in the preparation of this report:

1. Government Code Section 65913.4 (VHFHSZ carve-out and mitigation measure references).

2. Public Resources Code Section 21080.66 (statutory exemption from CEQA).

3. Public Resources Code Section 4290 (development fire safety standards).

4. Public Resources Code Section 4291 (defensible space requirements for SRA).

5. Government Code Section 51182 (defensible space requirements for VHFHSZ).

6. Title 14, California Code of Regulations, Division 1.5, Chapter 7, Subchapter 2, State Minimum Fire Safe Regulations (implementing PRC 4290).

7. California Wildland-Urban Interface Code, Title 24, Part 7 (2025 edition, effective 1 January 2026).

8. California Building Code Chapter 7A (2022 edition) – prior location of WUI provisions.

9. Los Angeles Municipal Code Sections 91.7203, 91.7207, Fire Code Section 57.4911, and LAMC 57.4906.5.2 (VHFHSZ and brush clearance requirements).

10. Los Angeles Board of Fire Commissioners report describing 2025 CWUIC reorganization and City adoption (18 November 2025).

11. Los Angeles Department of Building and Safety, Fire Hazard Severity Zone Supplemental Correction List (PC.STR.Corr.Lst.116, Rev. 2025-12-23).

12. Los Angeles Department of Building and Safety, Information Bulletin P/BC 2023-023 (superseding P/BC 2020-023), trellis/deck/roof covering VHFHSZ restrictions.

13. Office of the State Fire Marshal, Building Materials Listing (BML) Program and WUI Products Handbook (Chapter 7A replaced by CWUIC Part 7, effective 1 January 2026; product category structure).

14. Insurance Institute for Business & Home Safety, “Wildfire: Ember Entry through Vents.”

15. Insurance Institute for Business & Home Safety, Wildfire Prepared Home Technical Standard.

16. National Institute of Standards and Technology, “Quantifying Firebrand Exposures in the Wildland-Urban Interface.”

17. Cohen, J.D. (2000), "Preventing Disaster: Home Ignitability in the Wildland-Urban Interface," USDA Forest Service.

18. CAL FIRE, "Defensible Space" and "Fire Smart Landscaping" guidance (Ready for Wildfire).

19. Board of Forestry and Fire Protection, "Defensible Space Zones 0, 1, and 2" (rulemaking status page).

20. Executive Order N-18-25 (Zone 0 rulemaking timeline).

21. Office of the State Fire Marshal, "Fire Hazard Severity Zones" (hazard vs. risk framing).

22. California Attorney General, Wildfire CEQA Guidance (Appendix G wildfire questions, baseline and impact considerations).

23. Governor's Office of Planning and Research, Fire Hazard Planning Technical Advisory (public review draft; Appendix G wildfire questions).

24. UC Extension, "Myth: Firewise Plants."

25. FEMA P-737, "Home Builder's Guide to Construction in Wildfire Zones" (sprinkler considerations).

26. Los Angeles Fire Department Brush Clearance Requirements and Evacuation Information.

27. CAL FIRE, "Fuels Reduction."

28. Andrews, P.L. (2014), "Current Status and Future Needs of the BehavePlus Fire Modeling System," USDA Forest Service, RMRS-GTR-106.

Appendix A
Legal Nexus Exhibit

Government Code Section 65913.4(a)(6)(D) provides that the VHFHSZ site constraint "does not apply to sites that have adopted fire hazard mitigation measures" pursuant to identified standards. This exhibit summarizes how the Project satisfies each statutory category.

Statutory Category	Applicable Law / Standard	Project Compliance Evidence
(i) Defensible Space	Government Code §51182 (LRA-VHFHSZ); PRC §4291 (SRA equivalent); AB 3074/SB 504 Zone Framework	Approved landscape/hardscape plans (LC-1–LC-4, LP-1–LP-8) with Zone 0, 1, 2 designations; O&M framework (§7); LAFD 200-ft brush clearance commitment (§4.7)
(ii) PRC 4290 / Title 14	PRC §4290; Title 14 CCR Div. 1.5, Ch. 7, Subch. 2 (access, signage, water, fuel modification)	Civil/site plans (C-1.0–C-2.3, A-2.4–2.5, A-5.1); FDC locations; LAFD H&A stamp (A-2.4); LADWP municipal water; fire-flow via sprinkler design-build; Access Conformance Worksheet (App. C)
(iii) WUI Building Standards	CWUIC Part 7 (2025 ed.), successor to CBC Ch. 7A; City adoption via LAMC Art. 7.1; LADBS PC.STR.Corr.Lst.116	VHFHSZ compliance note block (A-1.1B, 16 items); A-9.4–9.7 details; Code Crosswalk (App. B); WUI Product Schedule (App. D)

CEQA Posture: Project determined to be statutorily exempt from CEQA pursuant to PRC § 21080.66.

Site Jurisdiction: City of Los Angeles Local Responsibility Area (LRA), VHFHSZ. Defensible space governed by Government Code §51182.

Appendix B

Code Edition Crosswalk

(Legacy CBC Chapter 7A → CWUIC Part 7)

The following table maps the legacy CBC Chapter 7A section numbers referenced in the Project's plan notes to the corresponding provisions in the 2025 CWUIC Part 7. The Project's plan set was stamped 27 February 2026; the 2025 Title 24 edition became effective 1 January 2026. CWUIC Part 7 governs.

Legacy CBC Ch. 7A Ref.	CWUIC Part 7 (2025)	Subject
CBC 1505A	CWUIC Part 7, §706.1	Class A roof assemblies / coverings
CBC 705A.2	CWUIC Part 7, §706.2	Roof-to-wall fire stopping
CBC 705A.3	CWUIC Part 7, §706.3	Valley flashings
CBC 705A.4	CWUIC Part 7, §706.4	Gutter debris protection
CBC 706A.2 / 707A.3	CWUIC Part 7, §707.2 / 707.3	Ventilation openings / ember-resistant vents
CBC 707A.3, SFM 12-7A-1	CWUIC Part 7, §707.4	Ignition-resistant exterior walls
CBC 707A.3.2	CWUIC Part 7, §707.4.2	Wall coverings (foundation to roof)
CBC 707A.8, SFM 12-7A-3	CWUIC Part 7, §707.8	Eaves, soffits, cantilevered projections
CBC 707A.8.7	CWUIC Part 7, §707.8.7	Underfloor enclosure
CBC 708A.2.1, SFM 12-7A-2	CWUIC Part 7, §708.2	Exterior windows and glazing
CBC 708A.3, SFM 12-7A-1	CWUIC Part 7, §708.3	Exterior door assemblies
CBC 709A.3	CWUIC Part 7, §709.3	Decking and walking surfaces
CBC 1207.2	CWUIC Part 7, §707.8.7(2)	Protected utilities in underfloor areas

Note: Exact Part 7 section numbering may vary slightly by adopted City amendments (LAWUIC / LAMC Art. 7.1). The crosswalk above reflects the statewide CWUIC Part 7 organization. Confirm with LADBS PC.STR.Corr.Lst.116 for City-specific numbering.

Appendix C
Title 14 Access Conformance Worksheet

The following worksheet compares observable plan dimensions and provisions to the Title 14 State Minimum Fire Safe Regulations (Article 2, Ingress and Egress). Dimensions shown as "[Verify]" require confirmation from construction-level detail sheets. The LAFD Hydrants & Access approval stamp on the approved plans (Sheet A-2.4) confirms LAFD's review and acceptance of the Project's access provisions. This Project's access serves twenty-nine dwelling units and therefore qualifies as a "road" under Title 14 definitions (§1273.00(i)).

Access Element	Title 14 Standard	Plan Dimension	Plan Sheet	Status / Notes
Road width (traffic lanes)	Two 10-ft lanes (20 ft min.)	Per civil plans	C-1.0–C-2.3	LAFD H&A approved (09-23-25); 10-ft building setback adds effective width
Road grade	Not to exceed 16%	Per grading plans	C-2.0–C-2.3	LAFD H&A approved (09-23-25); grading division stamp obtained
Vertical clearance	13 ft 6 in. minimum	Per site sections	A-5.1	No overhead obstructions noted in plan set
Turnaround/dead-end	Hammerhead or cul-de-sac per Title 14	Turning radius shown	A-2.4–2.5; A-5.1	DAS-stamped; LADWP staging area provides additional turnaround opportunity
Inside turning radius	Per fire apparatus requirements	Turning calcs shown	A-5.1	LAFD H&A stamp obtained
Road surface	All-weather driving surface	Paved private drive	C-1.0	Paved surface satisfies requirement
Gate clearance (if gates)	Min. 2 ft wider than road; emergency access	[If applicable]	A-2.1A	Verify if gates present at entry
Street/road signage	Visible from public access	Building numbering noted	A-1.1A	Per LAFD standards

Note: Plan dimensions were reviewed at the resolution available in this desktop evaluation. The LAFD Hydrants & Access approval stamp on the approved plans (Sheet A-2.4, Inspector Ruel Cole #441, September 23, 2025) provides LAFD's confirmation that access and hydrant provisions meet applicable requirements. See Appendix F for the approved fire access plan with LADWP water pressure data.

Appendix D
WUI Product Schedule

The following schedule identifies the major WUI-regulated building components, the applicable OSFM Building Materials Listing (BML) category, and the compliance pathway (OSFM-listed product or prescriptive code-compliant assembly). For each component, the project team should maintain product submittals in the permanent project record to support both plan-check approval and any future WUI hardening verification.

Building Component	OSFM BML Category	Plan Reference	Compliance Path / Notes
Roof covering	Cat. 8105	A-1.1B Item 1; A-1.4A–D	Class A assembly. ICC research reports on A-1.4A–D confirm WUI compliance for roofing product.
Ventilation openings	Cat. 8165	A-1.1B Item 4	OSFM-listed ember-resistant vent recommended; or prescriptive 1/8-in. mesh
Exterior wall assemblies	Cat. 8140	A-1.1B Items 6–7; A-9.2; A-9.4–9.7	Exterior stucco (noncombustible) per A-9.2 wall assemblies. Prescriptive NC pathway; LARR-approved products.
Exterior windows/glazing	Cat. 8120	A-1.1B Item 8; A-1.10–1.11	Window/door schedules on A-1.10 and A-1.11. Min. one tempered pane; or OSFM-listed; or SFM 12-7A-2.
Exterior doors	Cat. 8150	A-1.1B Item 9; A-1.10–1.11	Door schedule on A-1.10–1.11. Solid core 1-3/8 in. or 20-min. rating.
Decking / walking surfaces	Cat. 8110	A-1.1B Item 10; A-1.3A–B	OSFM-listed or heavy timber/NC within 10 ft
Eave/soffit assemblies	Cat. 8130	A-1.1B Item 5; A-9.4	Exterior soffits and projections are stucco (NC) per A-9.4 details.
Trellis / appendages	N/A (local requirement)	A-1.1B Items 15–16	LADBS P/BC 2023-023; heavy timber/NC beyond 10 ft

Note: OSFM BML categories referenced per the Office of the State Fire Marshal Building Materials Listing program. Products in these categories have been tested and listed by the State Fire Marshal for use in WUI construction. Prescriptive compliance is an acceptable alternative pathway where OSFM listing is not mandatory.

Appendix E
Wildfire Mitigation Inspection Log Template

The following template is provided for use by the property manager or HOA in documenting required wildfire mitigation inspections. Completed logs should be retained in the permanent Project record and made available for LAFD brush clearance inspection and, if applicable, PRC.

Date	Inspector Name	Area / Zone Inspected	Deficiencies Found	Corrective Action Taken	Completion Date

Corrective Action Timelines: Zone 0 combustible accumulations: 14 calendar days. Zones 1–2 vegetation deficiencies: 30 calendar days. Irrigation system failures: 7 calendar days. LAFD brush clearance: completed by June 1 annually. Building envelope deficiencies: 30 calendar days.

Inspector Signature: _____ Date: _____

Property Manager Acknowledgment: _____ Date: _____

Photocopy this form as needed. Maintain completed logs in the permanent Project record. This log template aligns with the O&M commitments in Section 7.

Appendix F

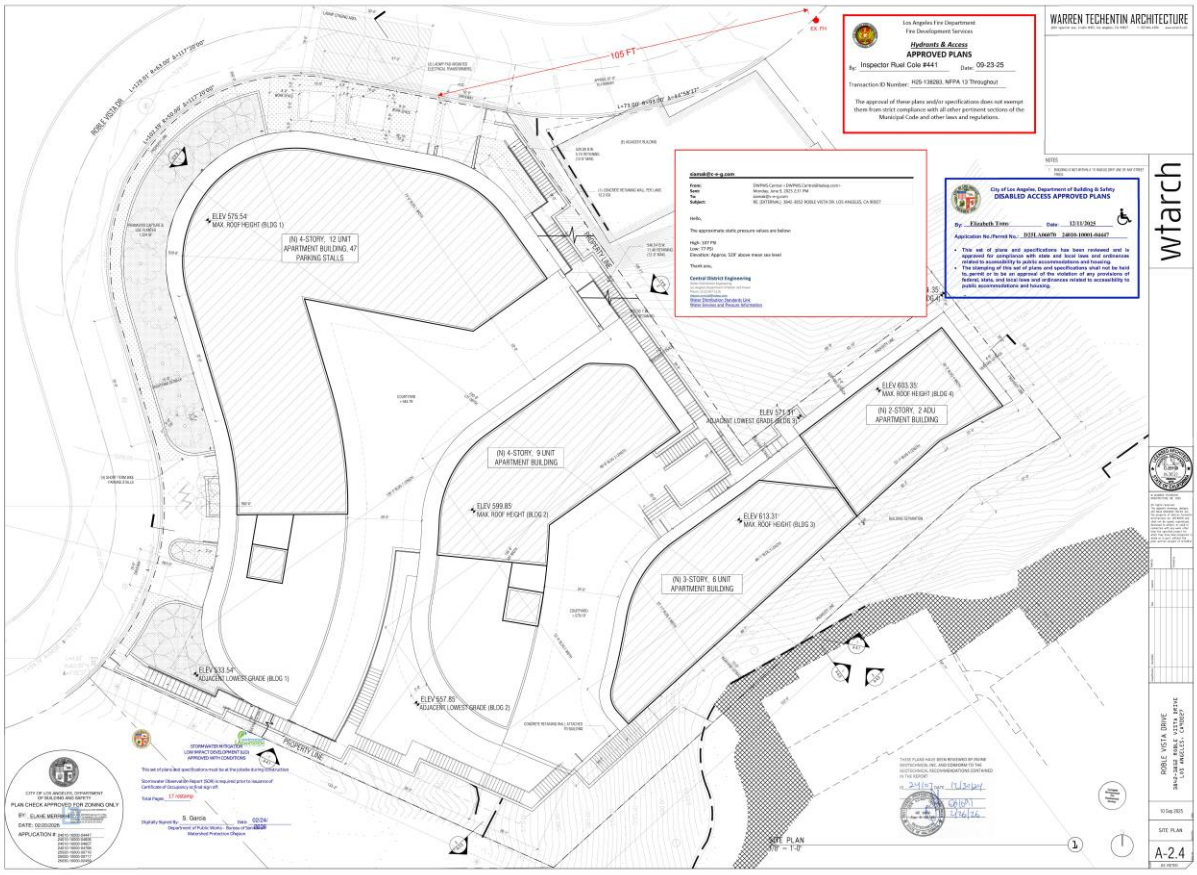
Approved Fire Access Plan with LADWP Water Pressure Data

The following exhibit reproduces Sheet A-2.4 from the approved plan set, which includes the LAFD Hydrants & Access approval stamp, agency clearance stamps, the site plan showing fire apparatus access and building configuration, and LADWP Central District Engineering water pressure data. This single sheet documents three critical elements of the Project's fire infrastructure compliance:

- **LAFD Hydrants & Access Approval:** Inspector Ruel Cole #441, dated 23 September 2025, Transaction ID H25-1336283. The stamp confirms LAFD review and acceptance of the Project's fire apparatus access, hydrant spacing, and fire protection provisions. The stamp notes "NFPA 13 Throughout," confirming LAFD's acknowledgment of full sprinkler protection.

- **LADWP Water Pressure Data:** Central District Engineering (Water Distribution Standards Unit) provided static pressure values for the project site: High: 107 PSI, Low: 77 PSI, at an elevation of approximately 529 ft above mean sea level. These values establish the baseline municipal water supply conditions for the NFPA 13 sprinkler system design.

- **Agency Clearance Stamps:** The sheet also bears the DAS Disabled Access approval (Elizabeth Tomo, 11 December 2025), Grading Division approval, and Stormwater Mitigation/LID approval (S. Garcia, Department of Public Works, Bureau of Sanitation, Watershed Protection Division, 02/24), confirming comprehensive agency review of the site plan.



Sheet A-2.4: Approved Fire Access Plan with LAFD Hydrants & Access stamp, LADWP water pressure data, agency clearance stamps, and site plan. Source: Warren Techentin Architecture, stamped plan set dated 27 February 2026.

Appendix G
LADBS Permit Status Documentation

This appendix is reserved for the LADBS permit status documentation confirming the Project's ministerial approval status and Ready to Issue (RTI) condition. The permit status printout should be obtained from the LADBS online permit portal and attached to this report when available.

Permit Application Numbers: 24010-10000-04447, 24010-10000-04449, 24010-10000-04756, 24010-10000-04758, 25016-10000-04076, 25016-10000-04078

Project Status: RTI — all agency clearances obtained; one minor administrative item pending before permit issuance.

Approval Pathway: Ministerial density bonus application directly to LADBS.

Attach LADBS permit status printout when obtained.

Attachment 2: NavigateLA Street Width Measurement for Roble Vista Drive