



TECHNICAL REVIEW – WILDFIRE MANAGEMENT FEATURES

Entitlement Level Documents

Technical Engineering Review - CEQA/AB 130 Analysis

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

Riverwalk at Studio City

Los Angeles, California

6 May 2026 (Revised 29 May 2026)

SGH Project 260494

PREPARED FOR

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EXECUTIVE SUMMARY

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

Key Technical Findings

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

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1. INTRODUCTION

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

1.1 Statutory Context

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

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

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

1.2 Scope and Approach

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

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

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

1.3 Background

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

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

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

1.4 Scope and Limitation of Engineering Opinion

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

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

2. DOCUMENTS REVIEWED

Our review was based on the following documents:

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

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

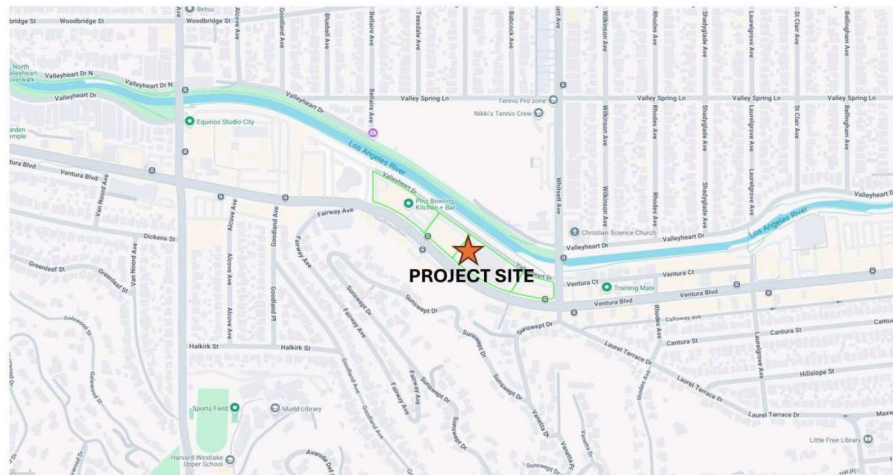
3. PROJECT DESCRIPTION

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

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

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

SITE : 12501-12665 W. VENTURA BLVD.



VICINITY MAP

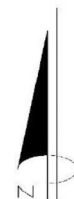


Figure 1 – Vicinity Map

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

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



Figure 2 – Aerial Photograph of Existing Site Condition

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

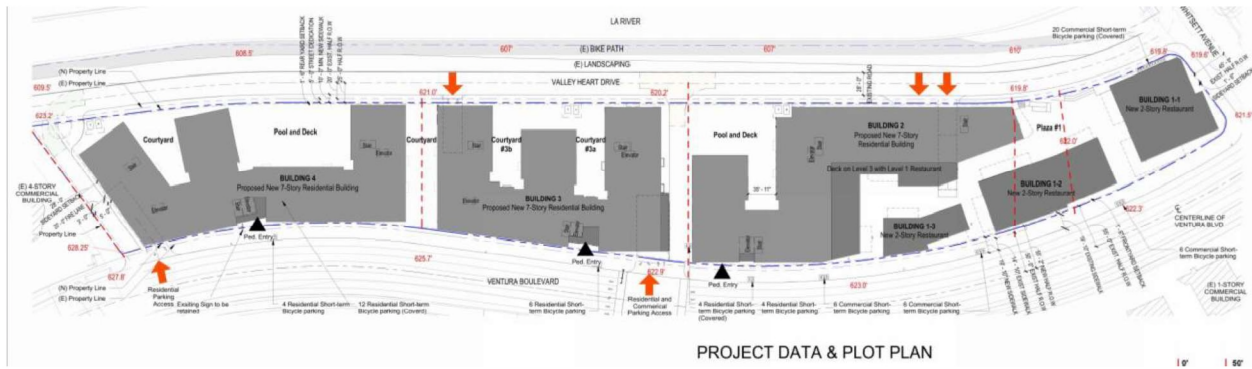


Figure 3 – Site Plan
(Sheet A-0.3A — Project Data and Plot Plan, MVE + Partners, dated 9/18/2025)

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

4. REGULATORY FRAMEWORK

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

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

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

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

4.2 Code Edition Applicability

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

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

4.3 WUI Building Standards — CWUIC 2025, Part 7

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

4.4 California PRC Section 4290 and Title 14 Fire Safe Regulations

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

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

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

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

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

4.7 Urban Infill Site Context

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

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

5. WILDFIRE EXPOSURE AND IGNITION PATHWAYS

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

5.1 Dominant WUI Structure Ignition Mechanisms

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

5.2 Site-Specific Exposure Assessment

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

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

6. ANALYSIS AND FINDINGS

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

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

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

6.1.1 Roof Coverings

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

6.1.2 Roof Gutters and Drainage

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

6.1.3 Ventilation Openings

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

6.1.4 Eaves and Soffits

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

6.1.5 Exterior Walls and Cladding

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

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

6.1.6 Exterior Windows and Glazing

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

6.1.7 Exterior Door Assemblies

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

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

6.1.8 Garage Doors

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

6.1.9 Decking and Balconies

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

6.1.10 Cantilevered Projections

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

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

6.1.11 Underfloor Enclosure

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

6.1.12 Roof-to-Wall Firestopping

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

6.1.13 Trellis and Shading Structures

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

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

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

6.2.1 Emergency Access

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

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

6.2.1.1 Aerial Fire Apparatus Access

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

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

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

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

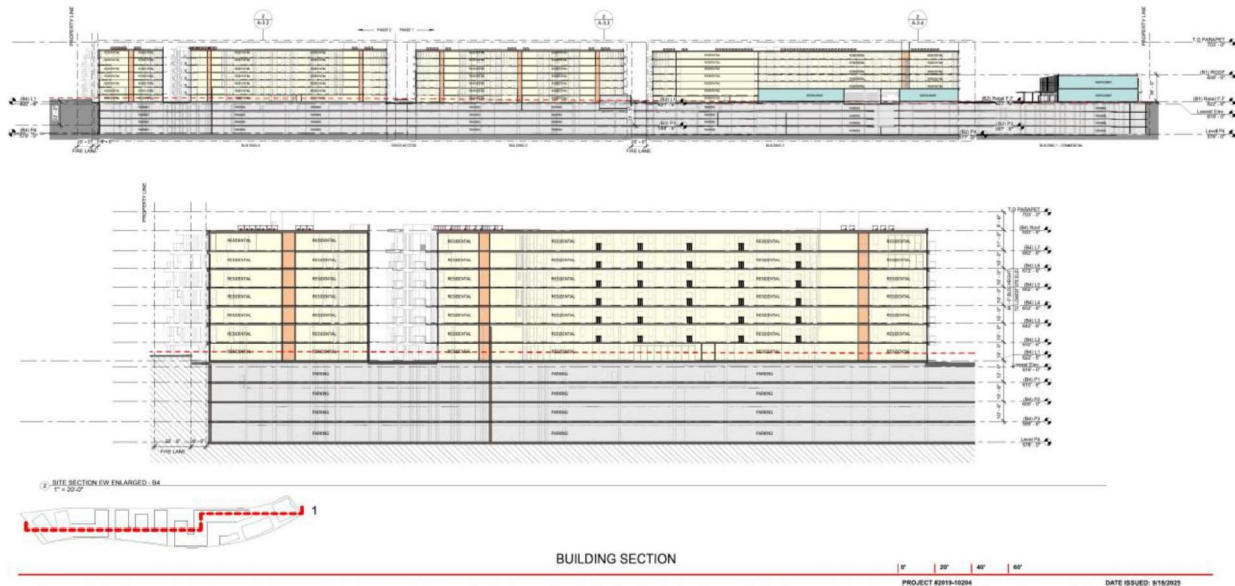


Figure 4 – Building Section (Sheet A-3.2, MVE + Partners)

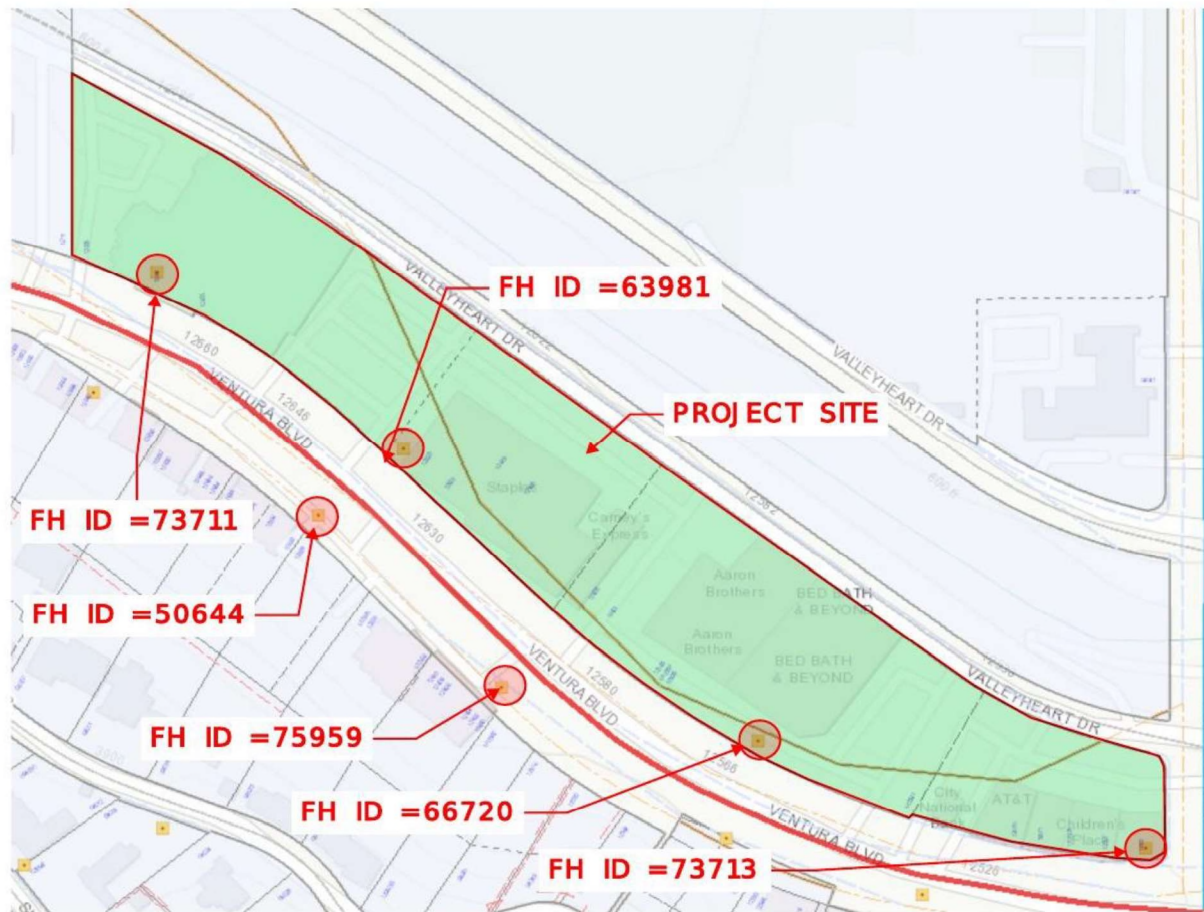
6.2.2 Water Supply and Fire Hydrants

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

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

TABLE 57.507.3.1
FIRE-FLOW BY TYPE OF LAND DEVELOPMENT

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



 POTENTIAL FIRE HYDRANTS

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

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

6.2.3 Building Numbering and Signage

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

6.2.4 Site-Specific Access Features

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

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

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

6.3.1 Defensible Space Zone Analysis for Urban Infill

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

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

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

6.3.2 Landscaping and Vegetation

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

6.3.3 Irrigation

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

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

6.3.4 LAFD Brush Clearance

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

6.3.5 Phasing and Interim Conditions

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

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

Interim Conditions

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

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

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

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

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

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

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

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

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

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

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

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

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

Conclusion

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

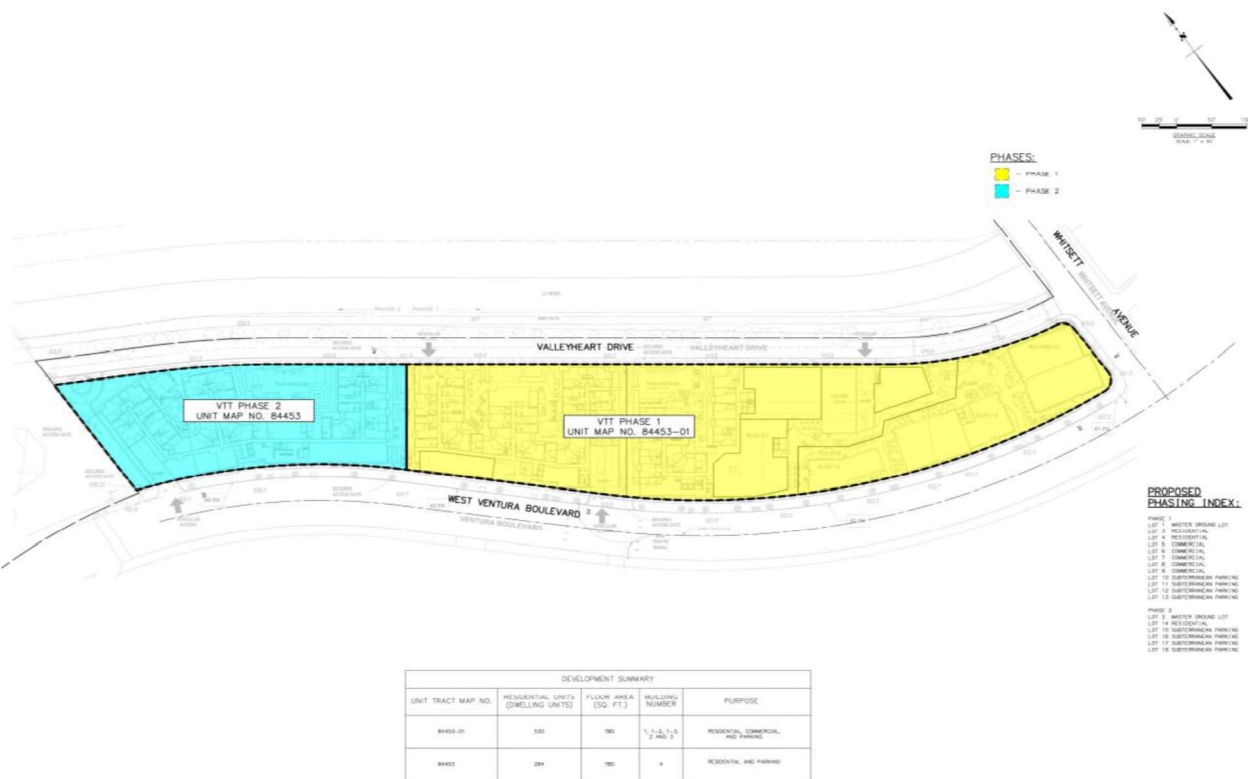


Figure 6 – Phasing Exhibit
(PL-1TTM01_PHASE-EXHIBIT_25-0611, Psomas, dated 11 June 2025)

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

6.4 LAFD and LAMC Fire Protection Features

6.4.1 Automatic Sprinkler System

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

6.4.2 Fire Alarm System

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

6.4.3 Egress and Evacuation

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

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

6.4.4 Fire Department Connections

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

6.4.5 Emergency and Standby Power

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

7. OPERATIONS AND MAINTENANCE FRAMEWORK

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

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

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

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

8. COMPLIANCE MATRIX

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

Table 1 – Compliance Matrix

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

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

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

9. LIMITATIONS AND QUALIFICATIONS

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

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

Entitlement-level Qualification

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

Not a CEQA Wildfire Analysis

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

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

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

10. SUMMARY OF TECHNICAL FINDINGS

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

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

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

Scope of Opinion

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

11. REFERENCES

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

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

Appendix A

Legal Nexus

A.1 Purpose

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

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

A.2 Crosswalk Table

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

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

A.3 Scope of This Crosswalk

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

Appendix B

Code Crosswalk

B.1 Purpose

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

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

B.2 Crosswalk Table

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

B.3 Test Method References

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

Appendix C
Title 14 Access Worksheet

C.1 Purpose

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

C.2 Worksheet Table

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

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

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

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

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

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

C.4 Exhibits

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

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

Appendix D
WUI Product Schedule

D.1 Purpose

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

D.2 Product Schedule and Permit Evidence Matrix

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

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

D.3 Submittal Requirement

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

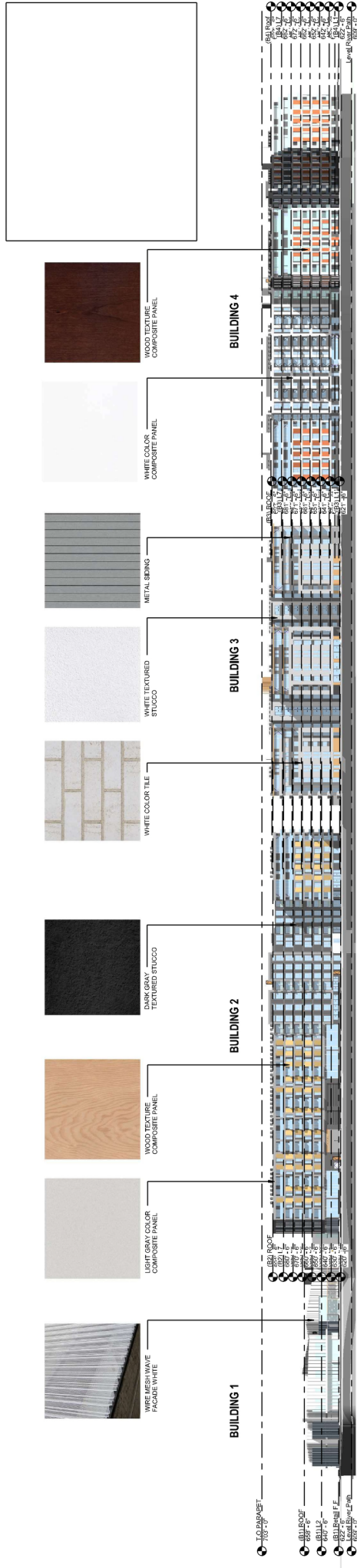
D.4 Assembly-Level Performance — NFPA 285

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

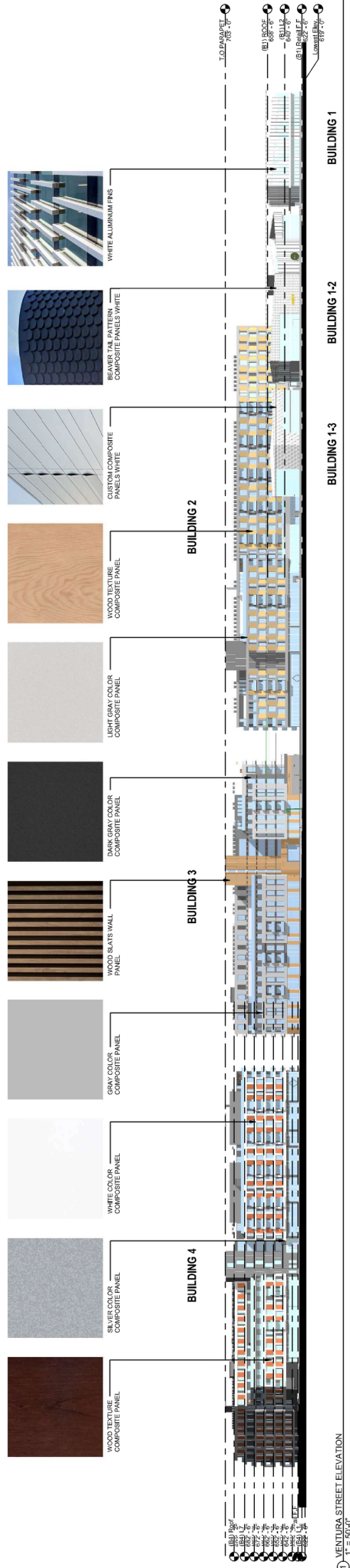
assemblies subject to NFPA 285, the wall assembly will be specified to a tested and listed NFPA 285-compliant configuration.

D.5 Exhibits

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



② VALLEYHEART DR ELEVATION
1" = 50'-0"



① VENTURA STREET ELEVATION
1" = 50'-0"

MATERIAL BOARD

12555 VENTURA BLVD
STUDIO CITY, CA 91604

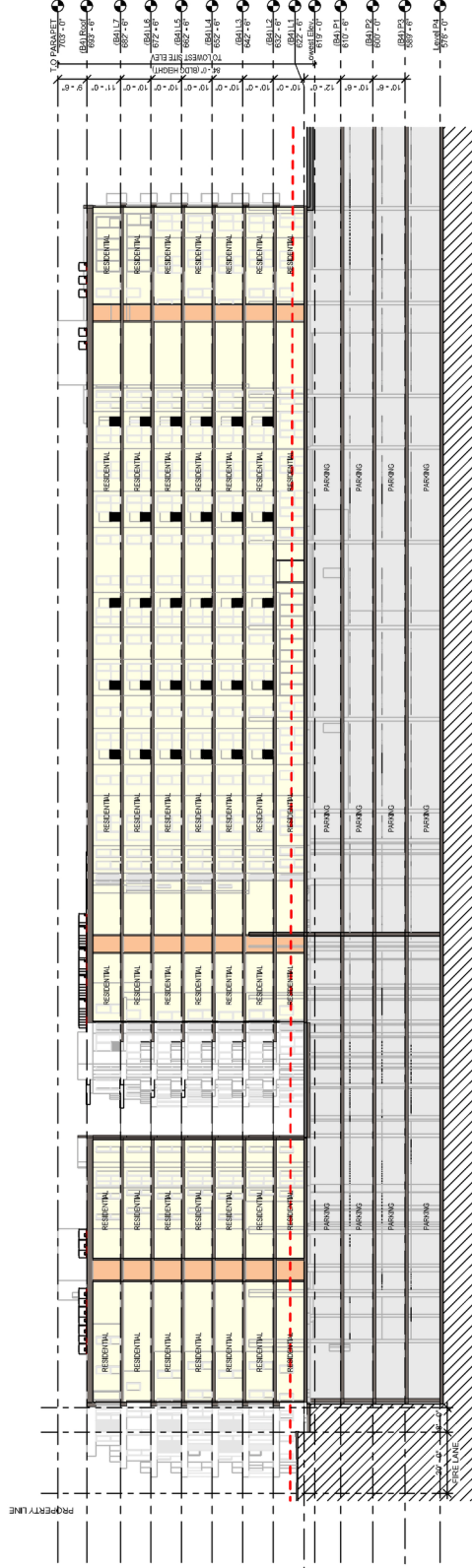
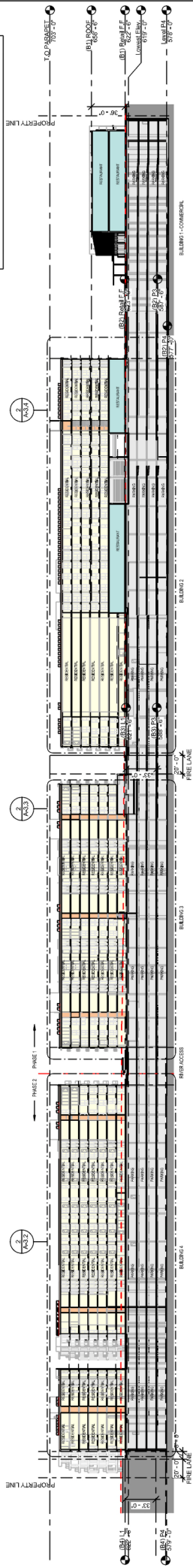
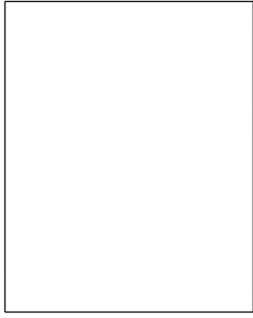
GENTON RC TORINO COMPANIES

0' 80' 160' 240'

PROJECT #2019-10204

DATE ISSUED: 9/18/2025

MVE + PARTNERS AOE A-9.1



2 SITE SECTION EW ENLARGED - B4
1" = 20'-0"



BUILDING SECTION

12555 VENTURA BLVD
STUDIO CITY, CA 91604

GENTON RICHIE GROUP
TORINO COMPANIES

MVE + PARTNERS

DATE ISSUED: 9/18/2025

A-3.2

Appendix F
Inspection Log Template

F.1 Purpose

This template supports the operations and maintenance commitments documented in Section 7 of the main report. The Project operator shall use this template (or an equivalent property management system entry) to document recurring wildfire mitigation inspections and corrective actions.

F.2 Corrective Action Timelines

- **Zone 0 (0 to 5 ft hardscape, building perimeter housekeeping):** Fourteen days
- **Zones 1 and 2 (defensible space, vegetation):** Thirty days
- **Irrigation system failures:** Seven days emergency repair
- **Vent screening, building envelope, gutters/scuppers:** Thirty days
- **LAFD brush clearance:** Annually by 1 June
- **Access road operability:** Ongoing

F.3 Inspection Log Template

[illegible]

Appendix G

Construction Phasing

G.1 Phasing Description

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

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

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

Phase 2 — Western Site (Building 4 only)

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

Site Operations During Phase 1

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

G.2 Per-Phase Code Compliance

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

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

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

G.3 Construction Phase Fire Safety Provisions

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

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

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

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

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

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

G.5 Exhibits

- **Exhibit G-1.** Construction Phasing memorandum, prepared by the project owner (Torino Companies).
- **Exhibit G-2.** Phasing Exhibit (PL-1TTM01_PHASE-EXHIBIT_25-0611), Psomas, dated 11 June 2025.
- **Exhibit G-3.** Promenade at Studio City Construction Schedule — Phased Option, dated 1 July 2024.
- **Exhibit G-4.** Sheet A-1.9 — Level 6 Floor Plan (MVE + Partners, dated 9/18/2025). Architectural floor plan view showing the Phase 1/Phase 2 line between Buildings 3 and 4 in the residential level plate; supplementary to the Phasing Exhibit (G-2).

CONSTRUCTION PHASING

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

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

Phase 1 includes Buildings 1, 2 and 3.

Phase 1 East Site:

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

Excavation/Shoring/ Garage Construction – 22 months

Vertical Construction (Concurrent, staggered by 5 months)

First - Building 2 – 29 Months

Second - Building 3 – 26 Months

Third - Building 1 – 12 Months

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

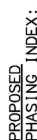
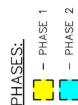
Phase 2 West Site:

Demolition/ Sitework – Pinz - 1.5 Months Total

Excavation/Shoring/ Garage Construction – 18 months

Vertical Construction (Concurrent, staggered by 5 months)

First - Building 4 – 28 Months



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

DEVELOPMENT SUMMARY			
UNIT TRACT MAP NO.	RESIDENTIAL UNITS (DWELLING UNITS)	FLOOR AREA (SQ. FT.)	BUILDING NUMBER
84443-01	520	180	1, 1-2, 1-2-2, 2 AND 3
84443	284	180	4

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

Primary Column		Start Date	Finish Date	Duration CD	20242025202620272028202920302031																							
Preconstruction	Entitlements	01/01/24	06/30/27	1277d																								
		01/01/24	12/29/25	728d																								
	Construction Documents/ Permitting	01/01/26	06/30/27	546d																								
Construction	Phase 1 - East Site	07/08/27	08/11/31	1496d																								
		07/08/27	02/26/31	1330d																								
		07/08/27	08/06/27	30d																								
		08/07/27	10/29/27	84d																								
		08/07/27	08/27/27	21d																								
		08/28/27	10/01/27	35d																								
		10/02/27	10/29/27	28d																								
		10/30/27	04/29/28	183d																								
		10/30/27	11/19/27	21d																								
		11/13/27	12/17/27	35d																								
		11/28/27	02/05/28	70d																								
		01/02/28	03/14/28	73d																								
		02/09/28	04/29/28	81d																								

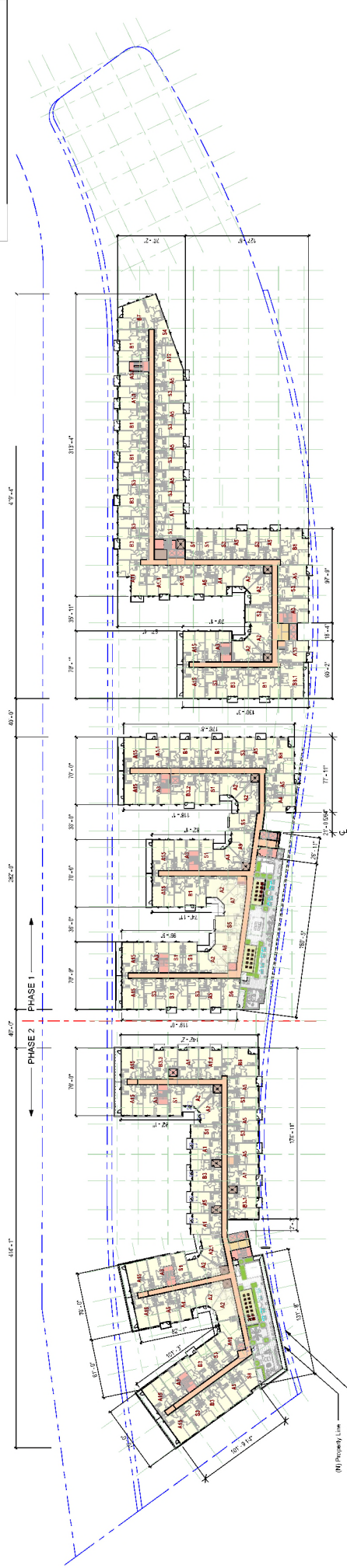
Primary Column		Start Date	Finish Date	Duration CD																								
					2024		2025		2026		2027		2028		2029		2030		2031									
					Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4				
48	EG Waterproofing Walls/ Shrinkcrete	06/01/29	06/25/29	25d																								
49	Subterranean Elevated Deck P2	06/26/29	08/24/29	60d																								
50	Subterranean Elevated Deck P1	08/25/29	10/23/29	60d																								
51	Grade Level Elevated Deck	10/24/29	01/06/30	75d																								
52	Superstructure / Facade / Interiors	01/07/30	08/11/31	582d																								
53	Building 4	01/07/30	06/02/31	512d																								
54	Sitework/Paving/Landscape / Final Completion	11/15/30	08/11/31	270d																								
55	Landscape	11/15/30	07/12/31	240d																								
56	Sitework / Paving	07/13/31	08/11/31	30d																								
57	Final Completion - Phase 2	08/11/31	08/11/31	0																								
58																												



BUILDING 4
285

BUILDING 3
264

BUILDING 2
266



LEVEL 6 UNIT COUNT (PER TYPE)			
Family	Unit Type	Quantity	
BUILDING 2			
UNIT S1	STUDIO	3	
UNIT S2	STUDIO	1	
UNIT S3	STUDIO	10	
UNIT S4	STUDIO	1	
UNIT A1	1 BR	1	
UNIT A1.1	1 BR	2	
UNIT A1.2	1 BR	1	
UNIT A2	1 BR	4	
UNIT A3	1 BR	2	
UNIT A3.1	1 BR	1	
UNIT A4	1 BR	1	
UNIT A5	1 BR	8	
UNIT A11	1 BR	1	
UNIT A12	1 BR	1	
UNIT A13	1 BR	1	

LEVEL 6 UNIT COUNT (PER TYPE)			
Family	Unit Type	Quantity	
BUILDING 3			
UNIT B1	2 BR	4	
UNIT B3	2 BR	3	
UNIT B7	2 BR	1	
UNIT B9	2 BR	1	
UNIT A1	1 BR	1	
UNIT A1.1	1 BR	1	
UNIT A1.2	2 BR	1	
UNIT B7.1	2 BR	3	
UNIT B10	2 BR	3	
BUILDING 4			
UNIT S1	STUDIO	4	
UNIT S3	STUDIO	3	
UNIT S5	STUDIO	2	
UNIT S6	STUDIO	1	
UNIT A1.1	1 BR	1	
UNIT A2	1 BR	4	

LEVEL 6 UNIT COUNT (PER TYPE)			
Family	Unit Type	Quantity	
BUILDING 4			
UNIT A3	1 BR	3	
UNIT A4	1 BR	1	
UNIT A5	1 BR	3	
UNIT A6	1 BR	1	
UNIT A7	1 BR	1	
UNIT A8	1 BR	1	
UNIT A9	1 BR	1	
UNIT A9.1	1 BR	8	
UNIT B1	2 BR	3	
UNIT B3	2 BR	1	
UNIT B3.2	2 BR	1	
UNIT B8	2 BR	1	
BUILDING 4			
UNIT S1	STUDIO	3	
UNIT S3	STUDIO	4	

LEVEL 6 UNIT COUNT (PER TYPE)			
Family	Unit Type	Quantity	
BUILDING 2			
UNIT S8	STUDIO	1	
UNIT A1	1 BR	4	
UNIT A1.1	1 BR	1	
UNIT A2	1 BR	5	
UNIT A2.1	1 BR	1	
UNIT A3	1 BR	3	
UNIT A4	1 BR	1	
UNIT A5	1 BR	6	
UNIT A10	1 BR	1	
UNIT A15	1 BR	6	
UNIT B3	2 BR	3	
UNIT B3.1	2 BR	1	
UNIT B3.3	2 BR	1	
UNIT B8	2 BR	1	
UNIT B2.3	2 BR	1	
UNIT B2.13	2 BR	1	
Grand total		44	135

UNIT COUNTS (PER BUILDING)			
Building	Unit Type	Quantity	Unit Mx. Ave Area
BUILDING 2			
STUDIO	80	30%	472 SF
1 BR	126	47%	662 SF
2 BR	60	23%	1,011 SF
BUILDING 3			
STUDIO	70	30%	446 SF
1 BR	108	41%	640 SF
2 BR	77	29%	996 SF
BUILDING 4			
STUDIO	264	100%	701 SF
BUILDING 1			
STUDIO	64	23%	433 SF
1 BR	139	49%	865 SF
2 BR	81	29%	996 SF
Grand total		264	716 SF
		814	100%
		701 SF	

LEVEL 6

12555 VENTURA BLVD
STUDIO CITY, CA 91604

TORINO COMPANIES

GENTON
PROPERTY GROUP

MVE + PARTNERS

DATE ISSUED: 9/18/2025

PROJECT #2019-10284

0' 100' 200' 300'

A-1.9

Appendix H
Existing Site Photographs

H.1 Purpose

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

H.2 Scope

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

H.3 Existing Tenants and Structures

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

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

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

H.4 Exhibits

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

①



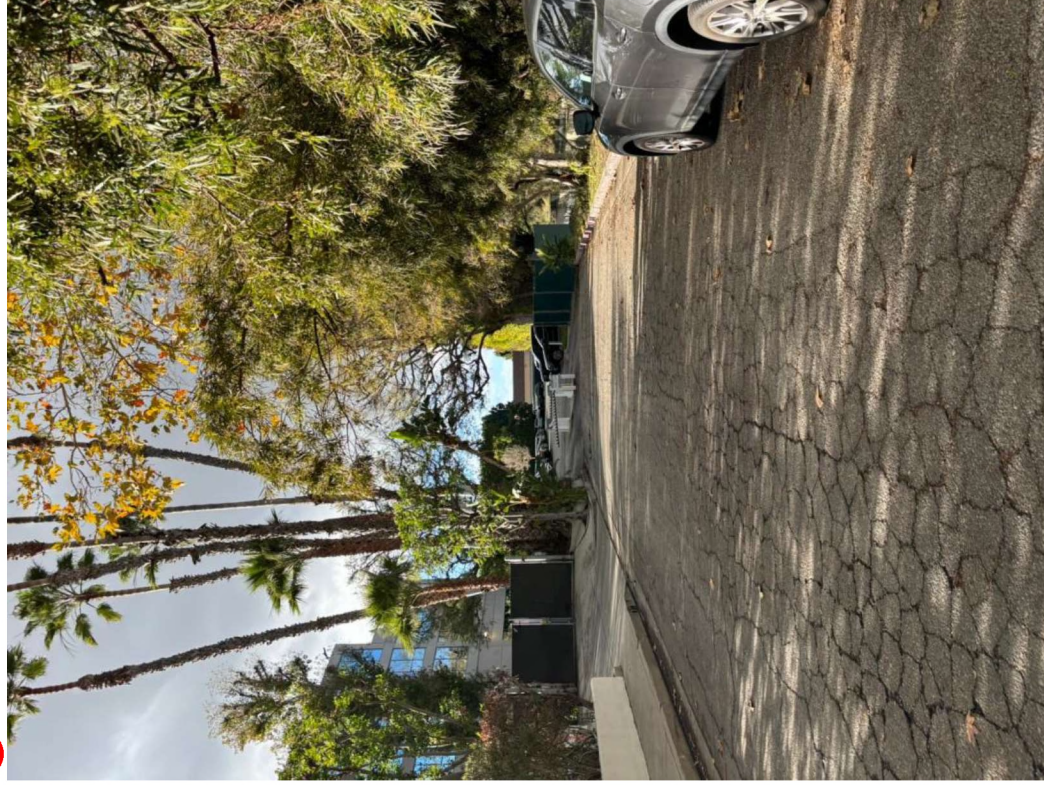
Facing south toward the Project Site on the west side of the Project Site

②



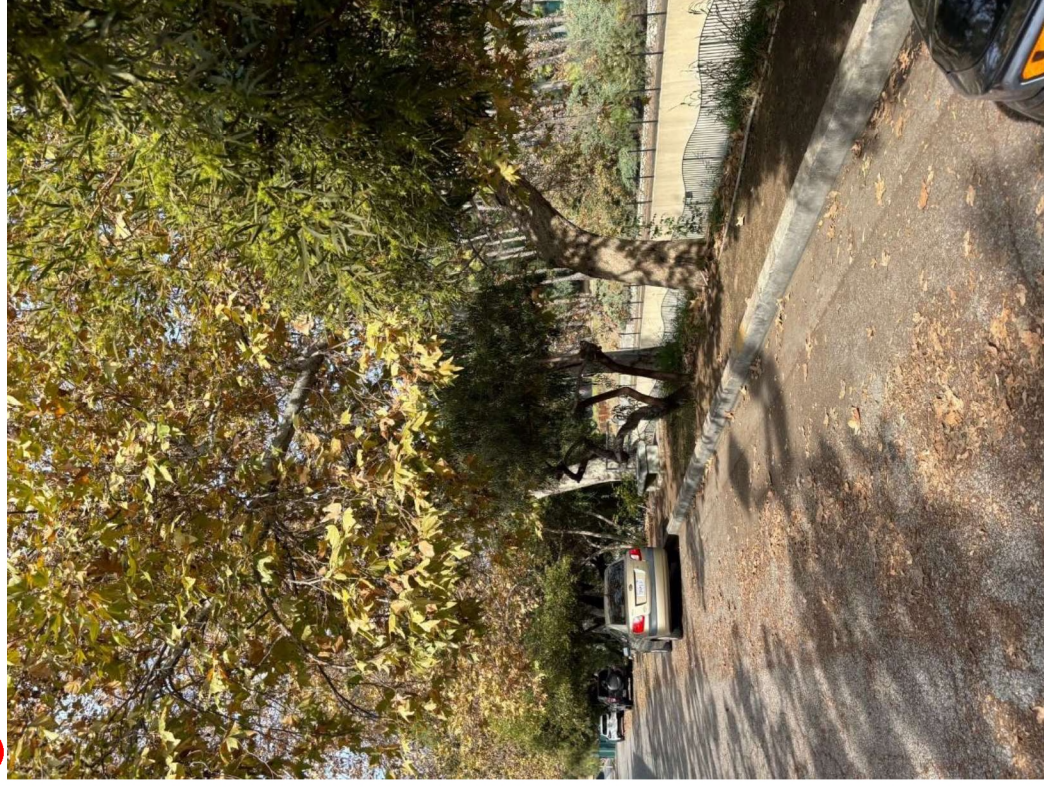
Facing southeast toward the Project Site on the west side of the Project Site

3



Facing west toward the Project Site on Valleyheart Dr.

4



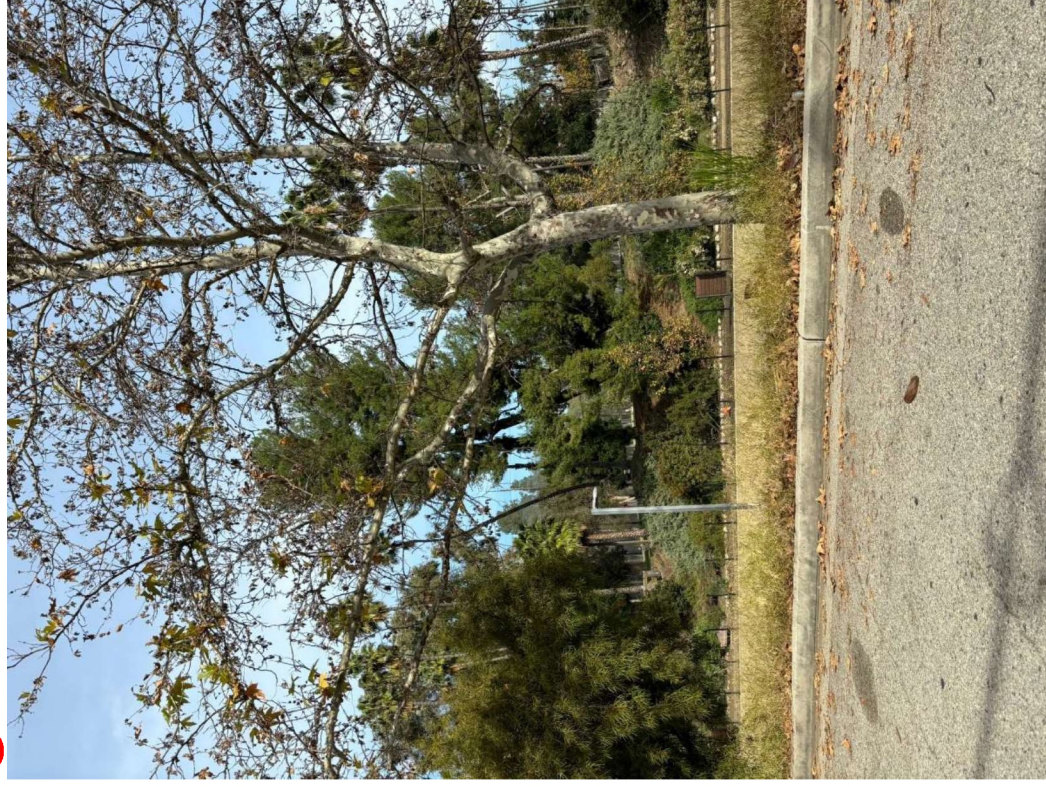
Facing northwest away from the Project Site on Valleyheart Dr.

5



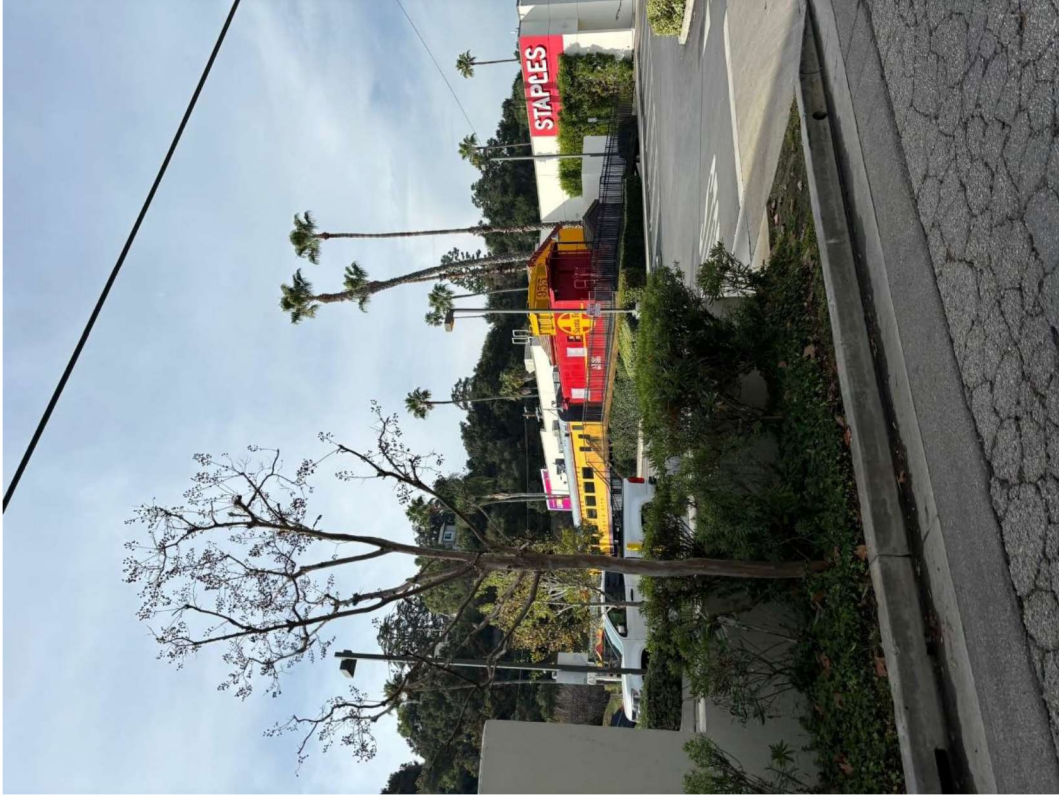
Facing south toward the Project Site on Valleyheart Dr.

6

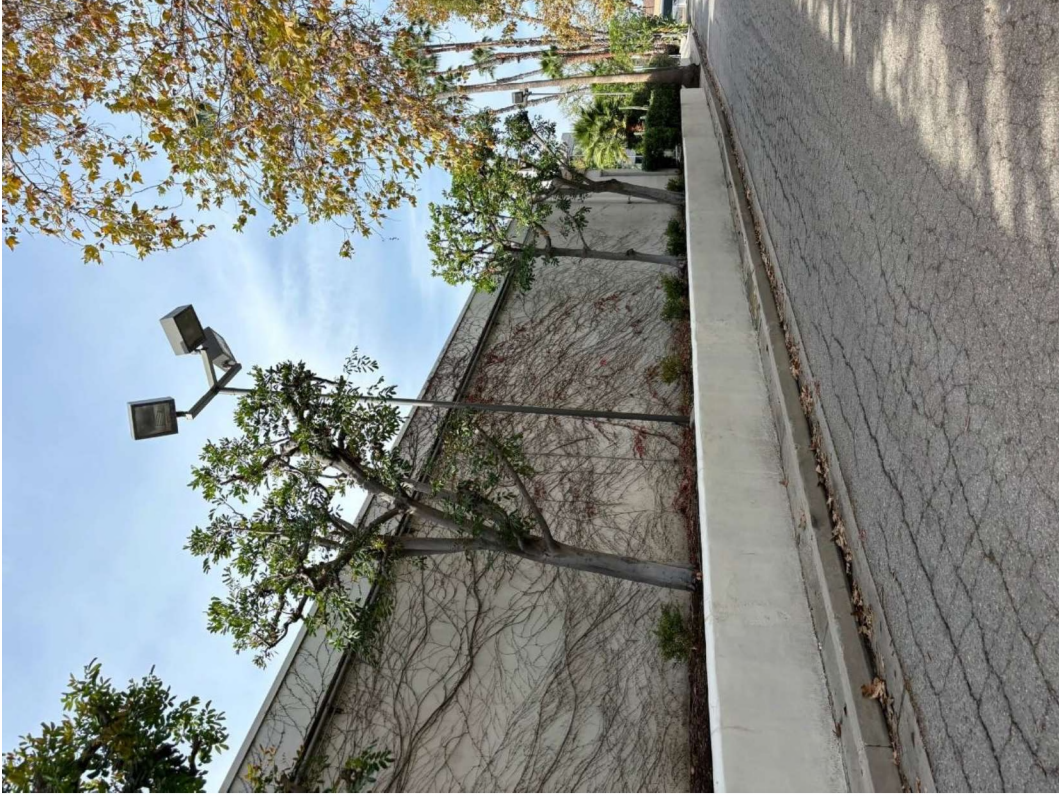


Facing north away from the Project Site on Valleyheart Dr.

7



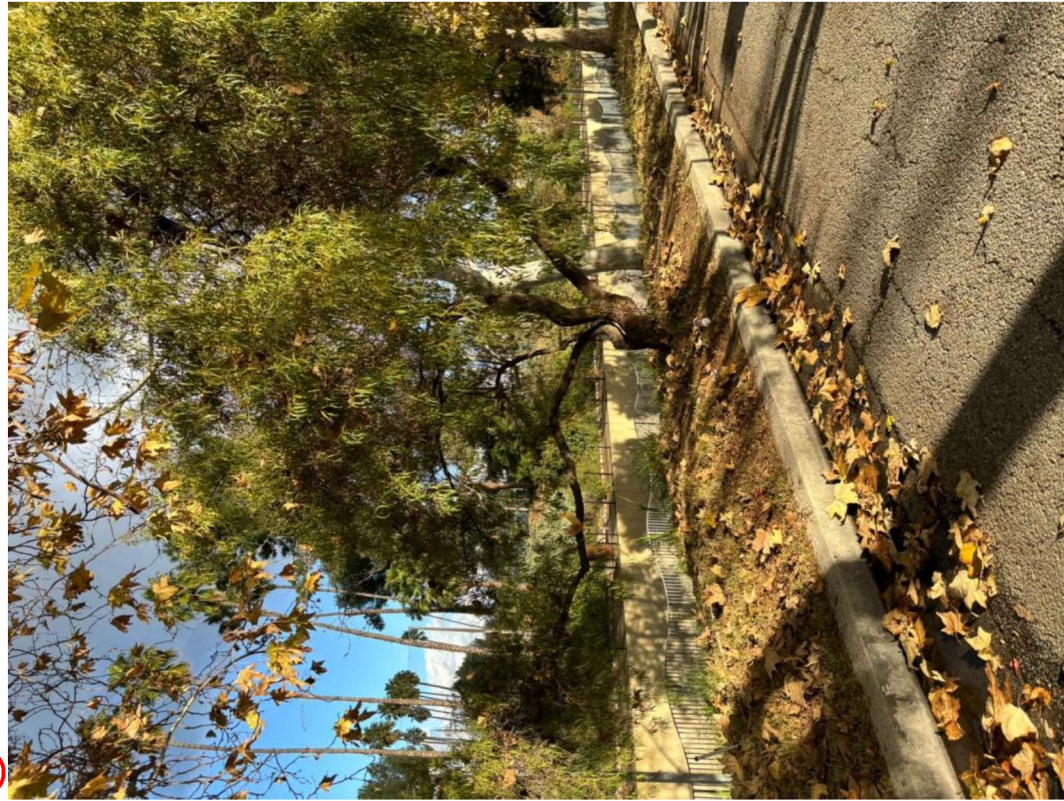
8



Facing southwest toward the Project Site on Valleyheart Dr.

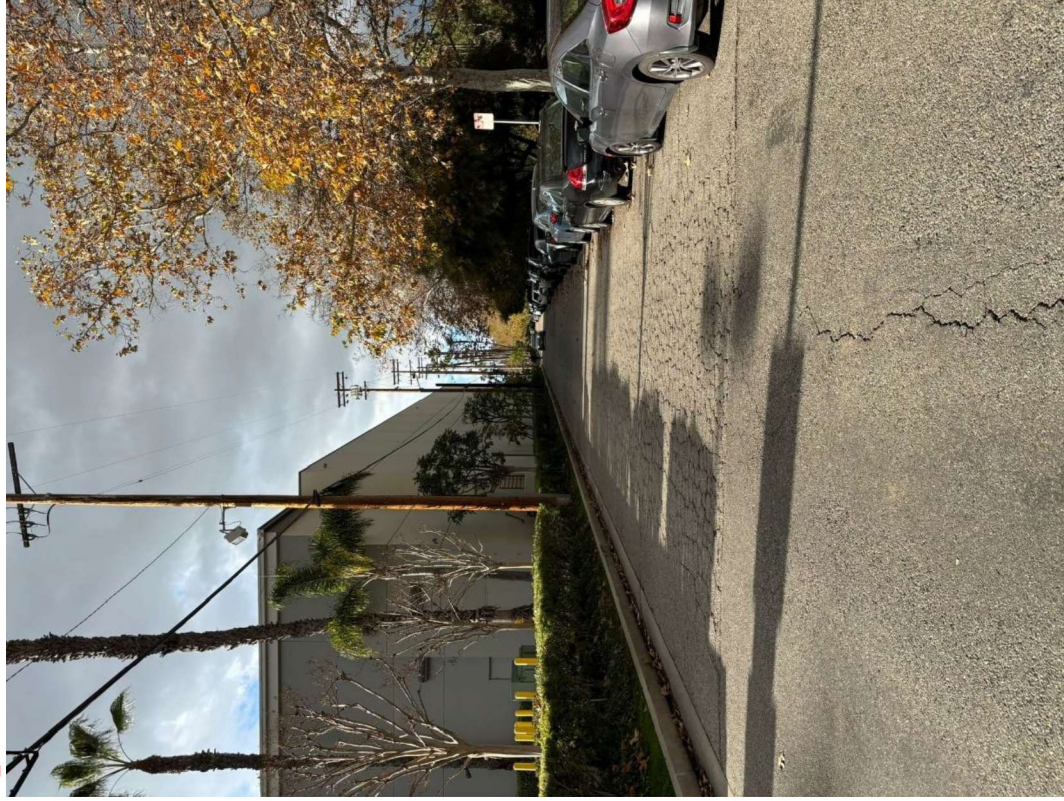
Facing southeast toward the Project Site on Valleyheart Dr.

9



Facing northeast away from the Project Site on Valleyheart Dr.

10



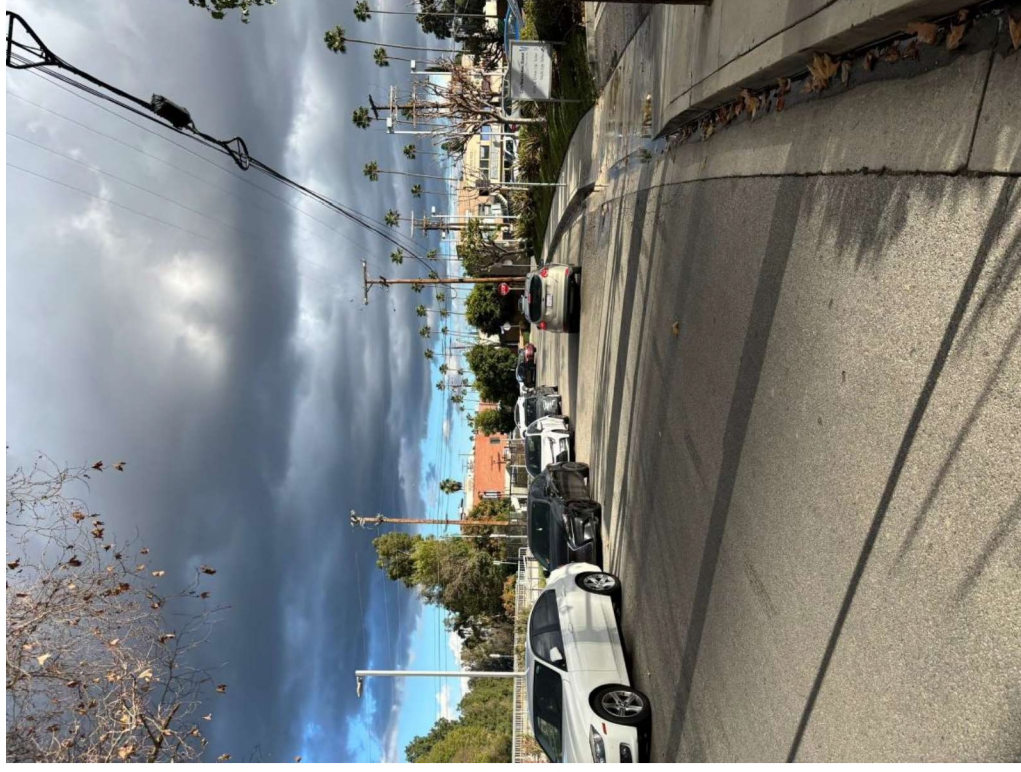
Facing west toward the Project Site on Valleyheart Dr.

11



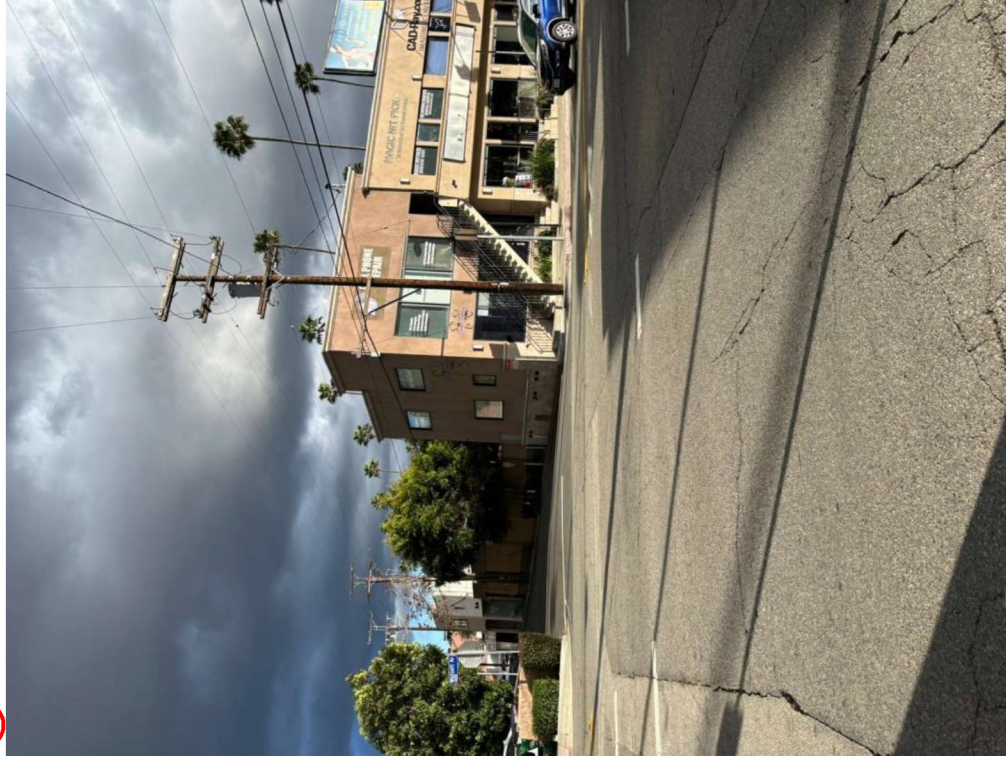
Facing southeast toward the Project Site on Valleyheart Dr.

12



Facing east away from the Project Site on Valleyheart Dr.

13



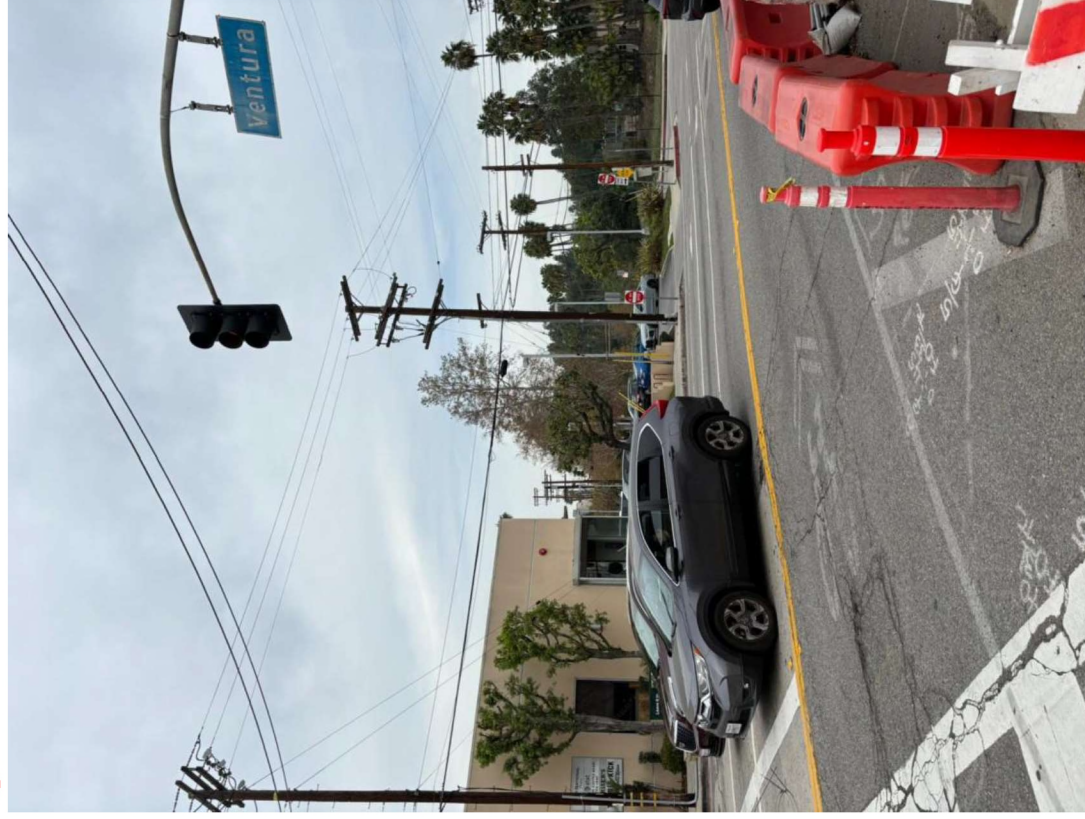
Facing east away from the Project Site on the corner of Whitsett Ave. and Valleyheart Dr.

14



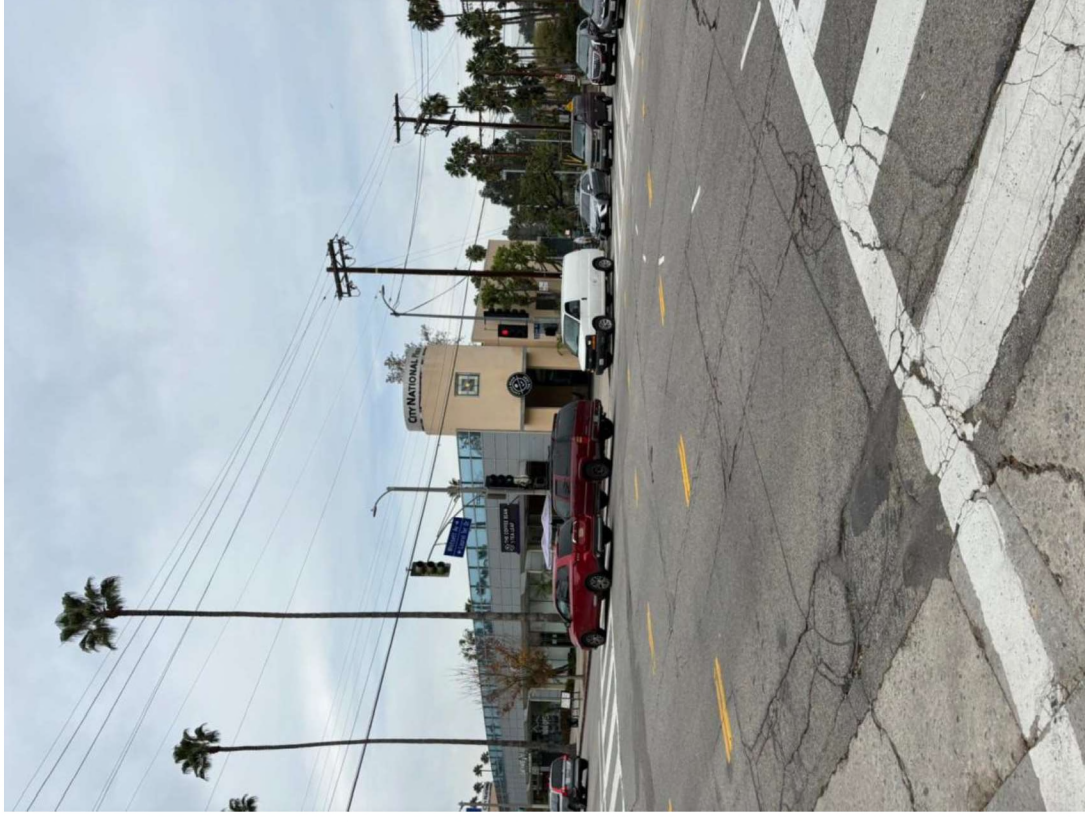
Facing south toward the Project Site on the corner of Whitsett Ave. and Valleyheart Dr.

15



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

16



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

17



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

18



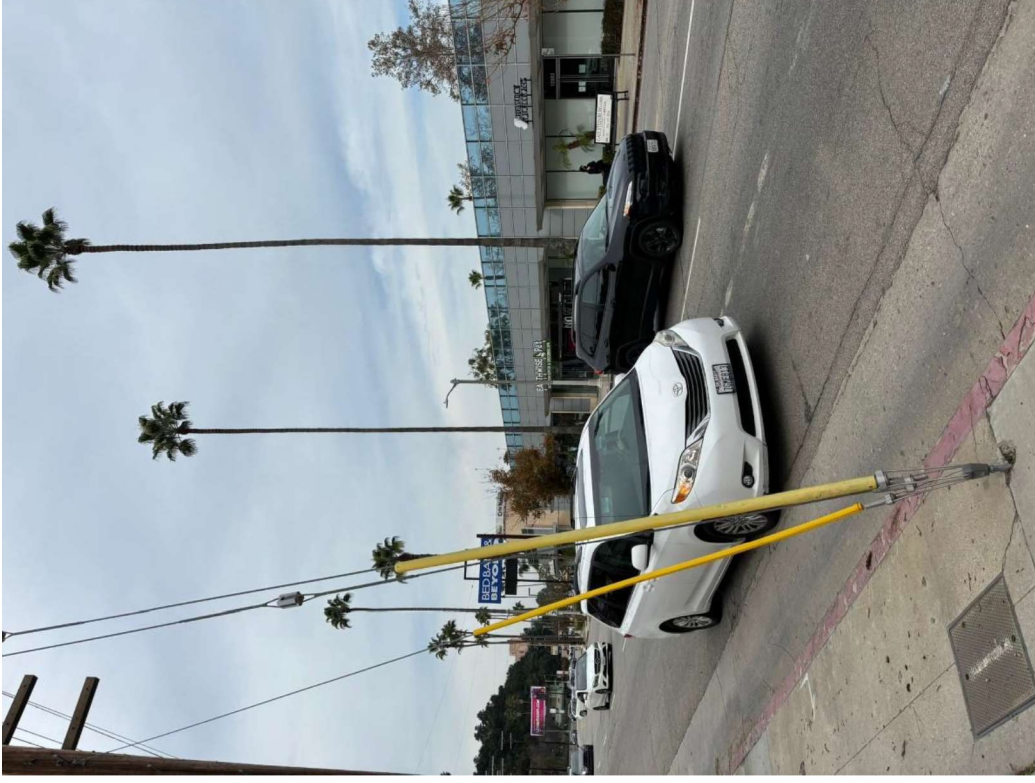
Facing northeast toward the Project Site on the southwest corner of Ventura Blvd. and Whitsett Ave.

19



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

20



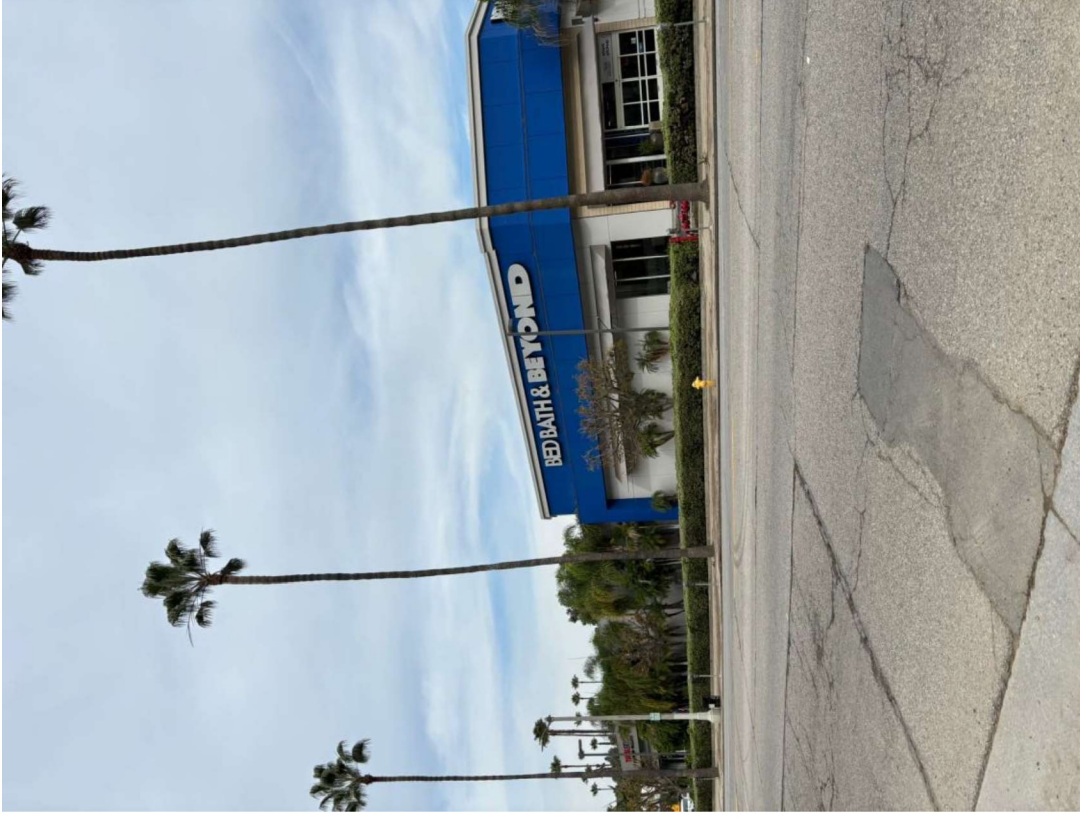
Facing northwest toward the Project Site on the south side of Ventura Blvd.

21



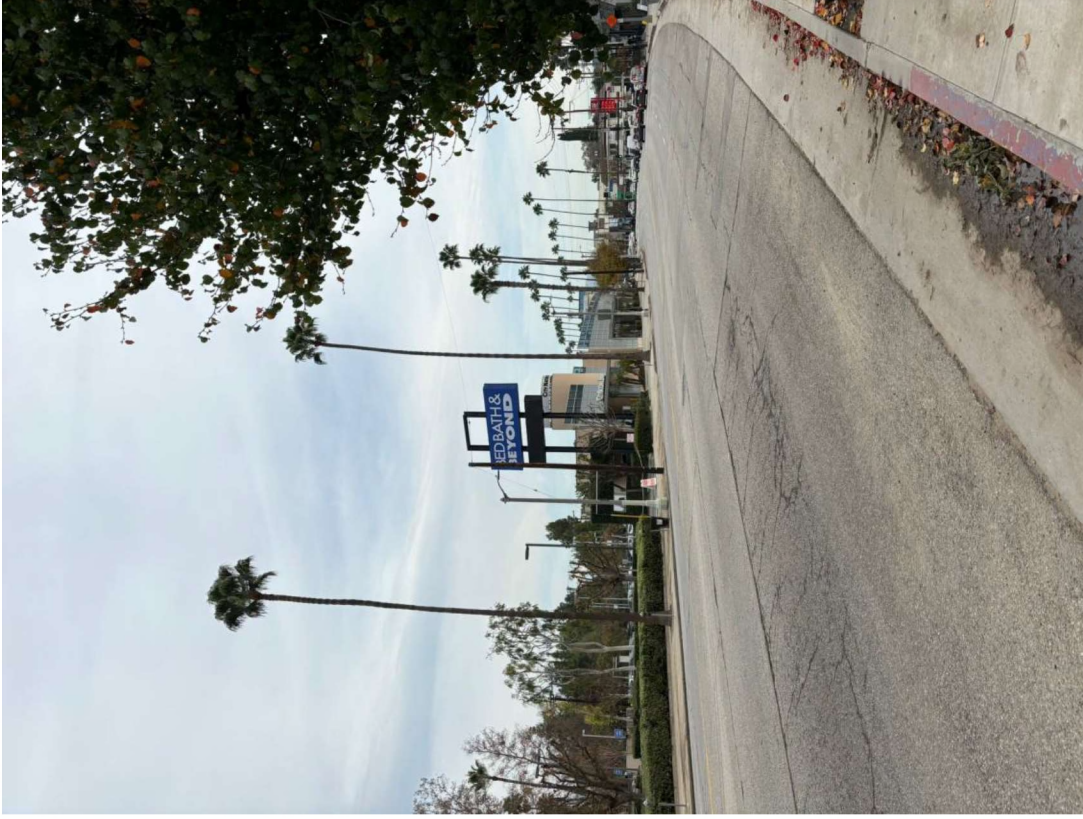
Facing northwest toward the Project Site on the south side of Ventura Blvd.

22



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

23



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

24



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

25



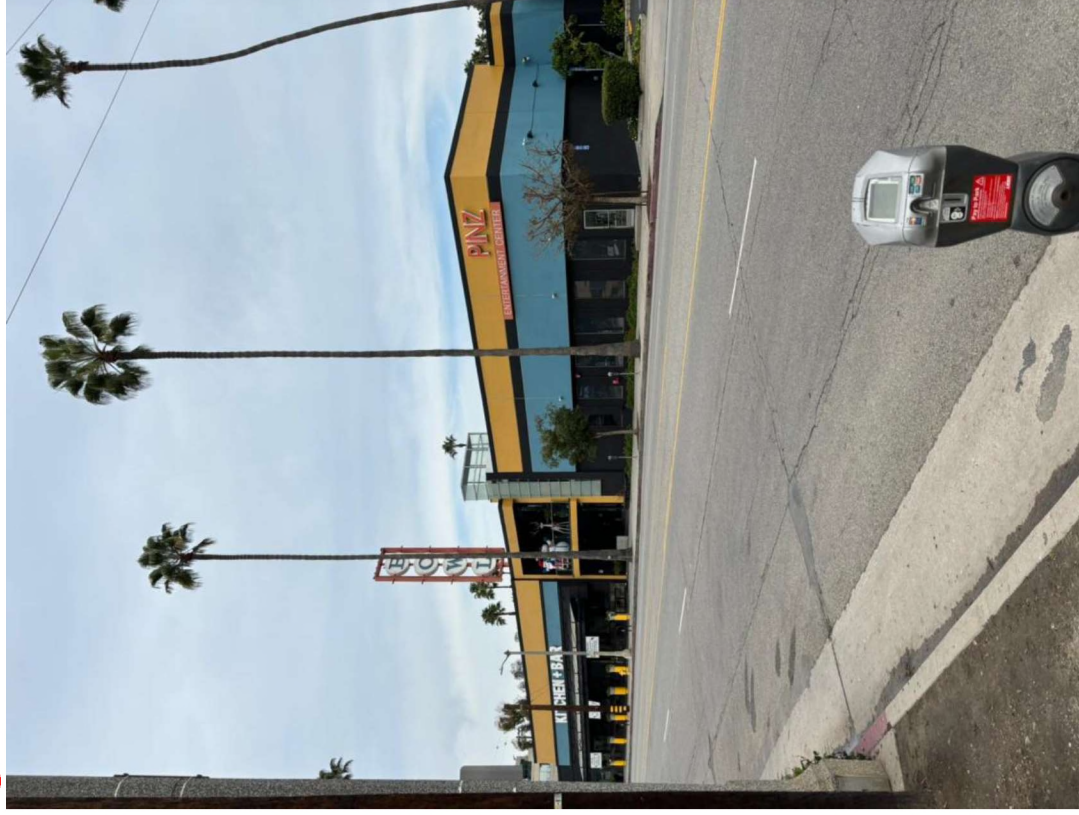
Facing north toward the Project Site on the south side of Ventura Blvd.

26



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

27



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

28



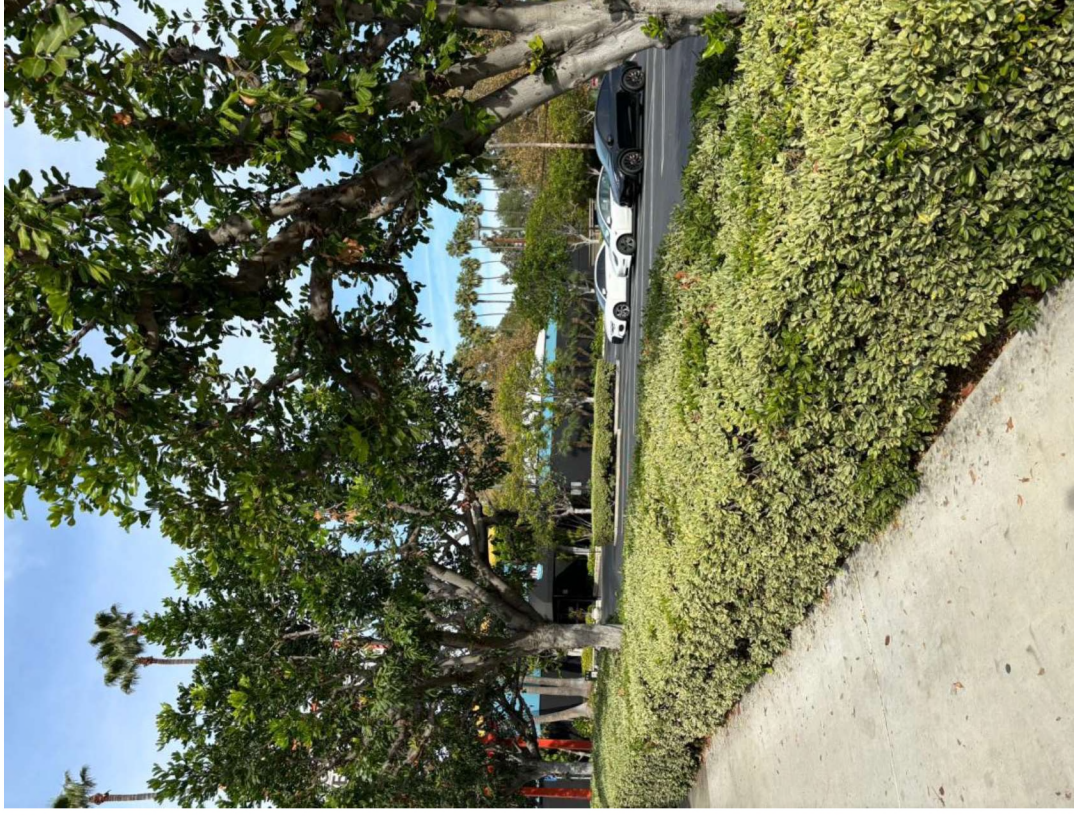
Facing west toward the Project Site on the north side of Ventura Blvd.

29



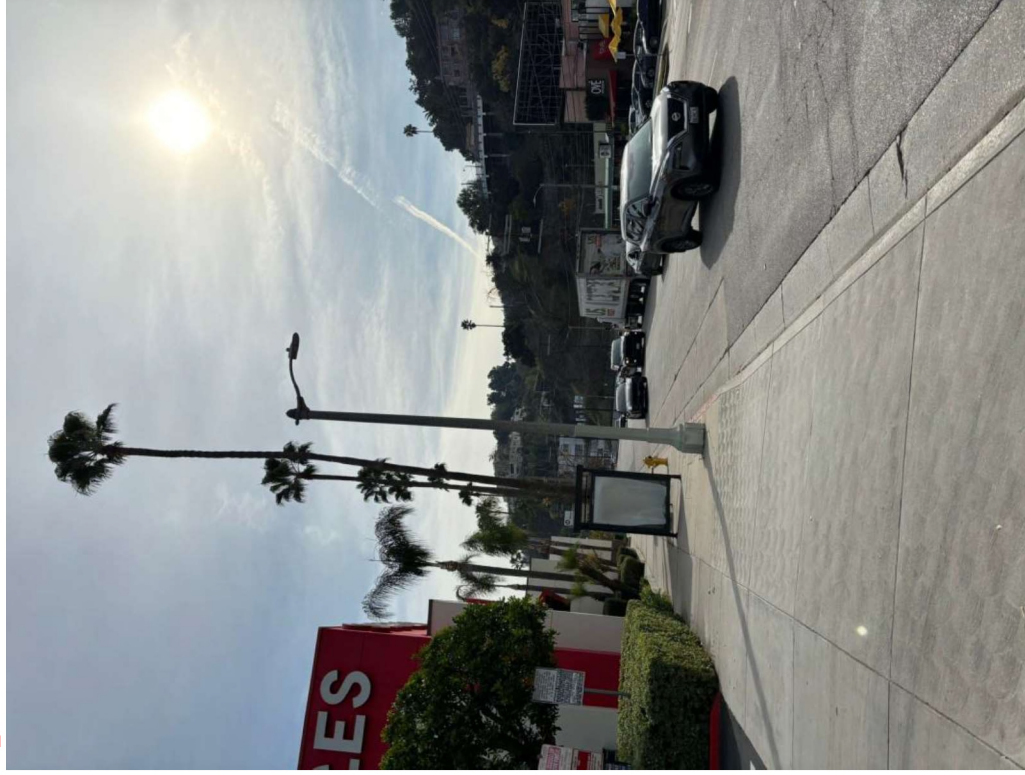
Facing northeast toward the Project Site on the north side of Ventura Blvd.

30



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

31



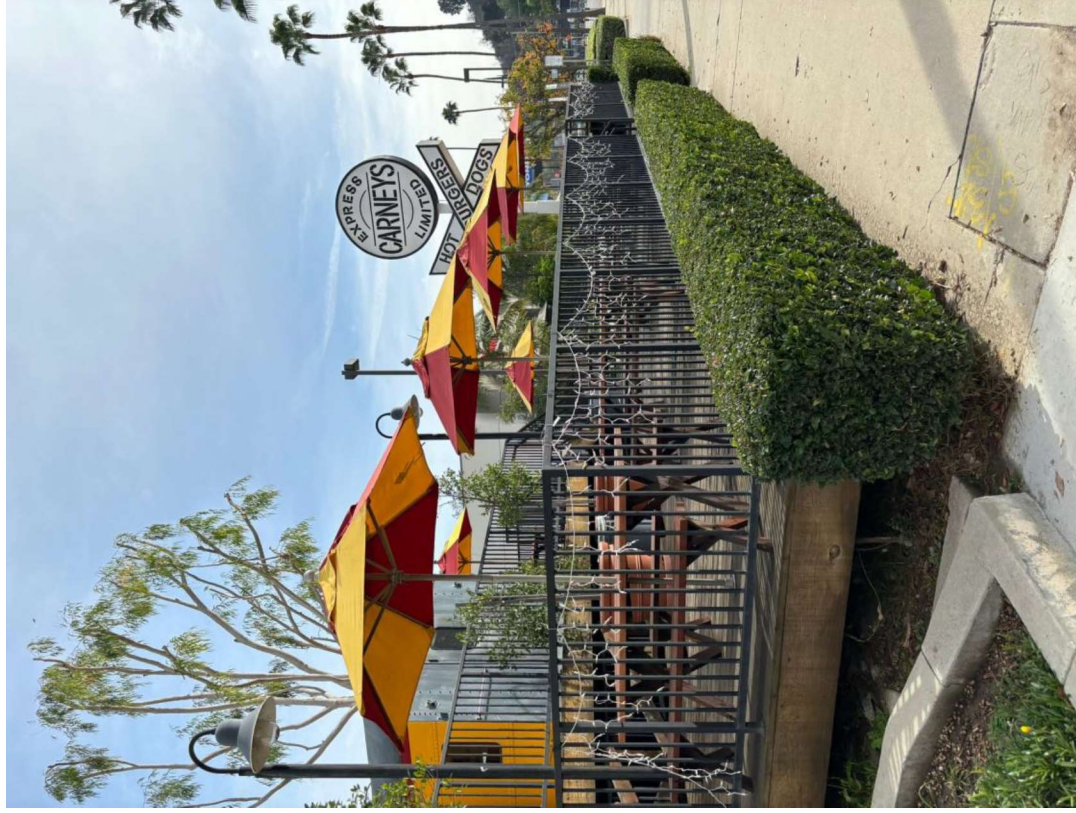
Facing west toward the Project Site on the north side of Ventura Blvd.

32



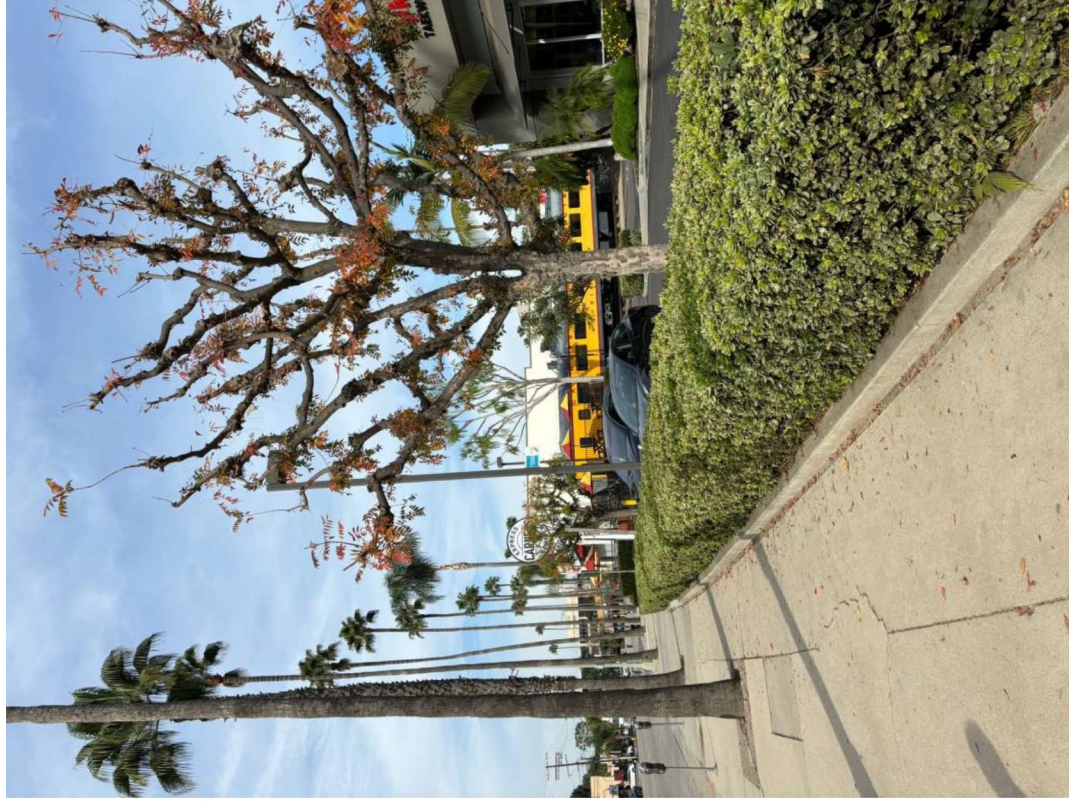
Facing south away from the Project Site on the north side of Ventura Blvd.

33



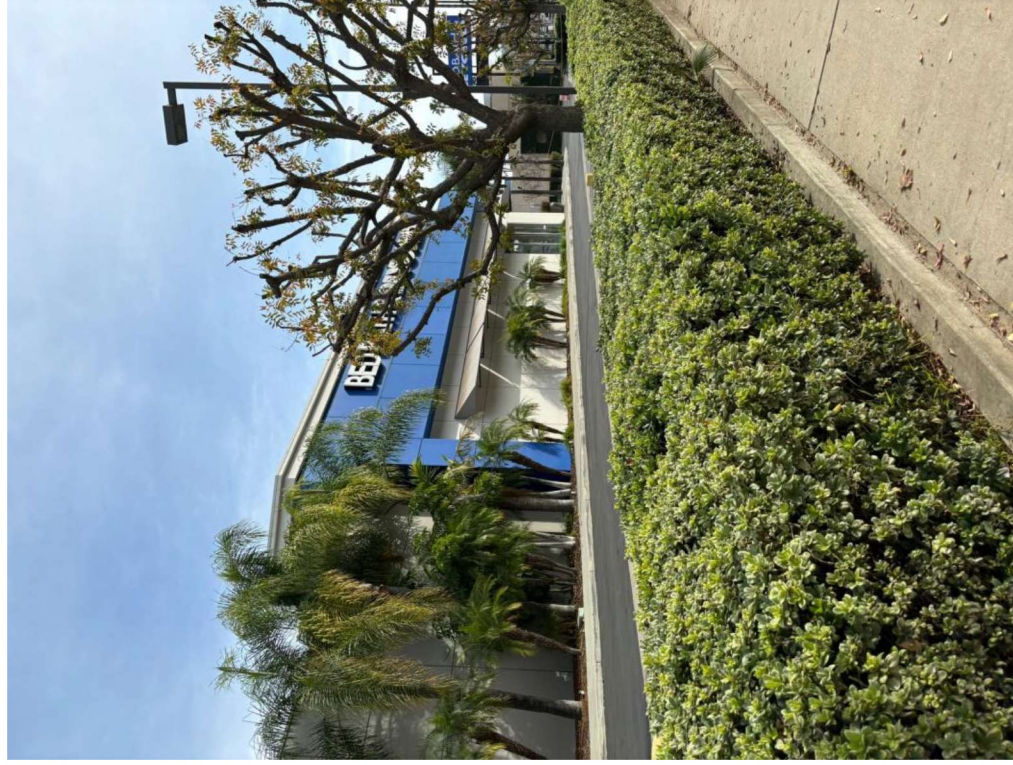
Facing northeast toward the Project Site on the north side of Ventura Blvd.

34



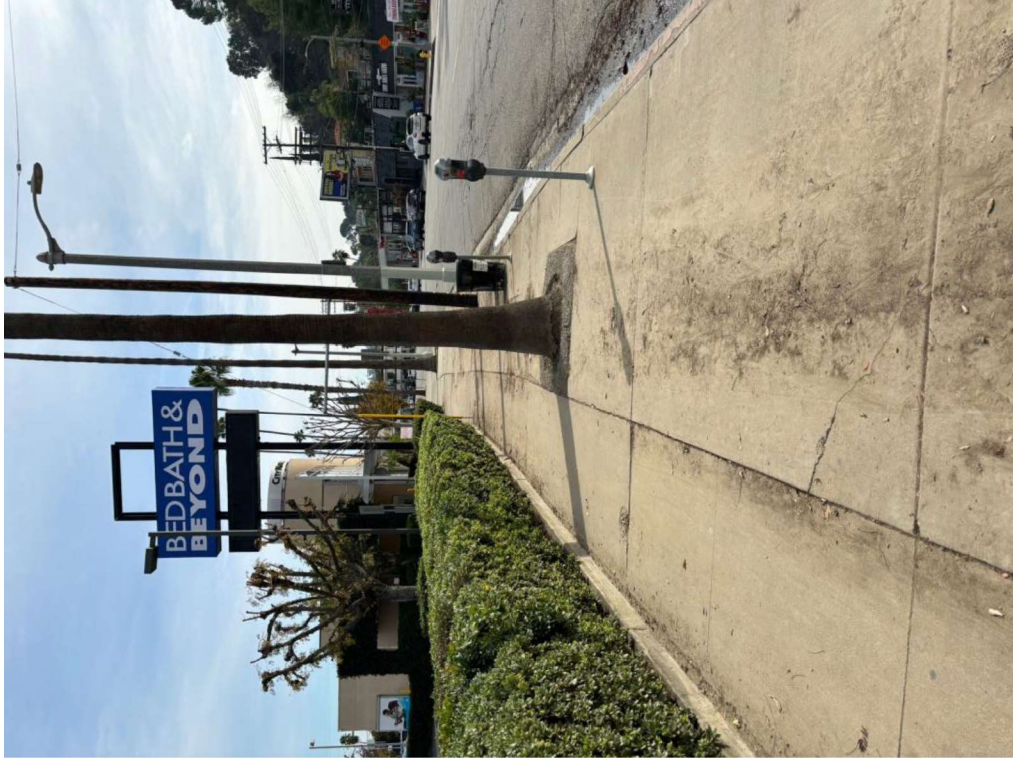
Facing west toward the Project Site on the north side of Ventura Blvd.

35



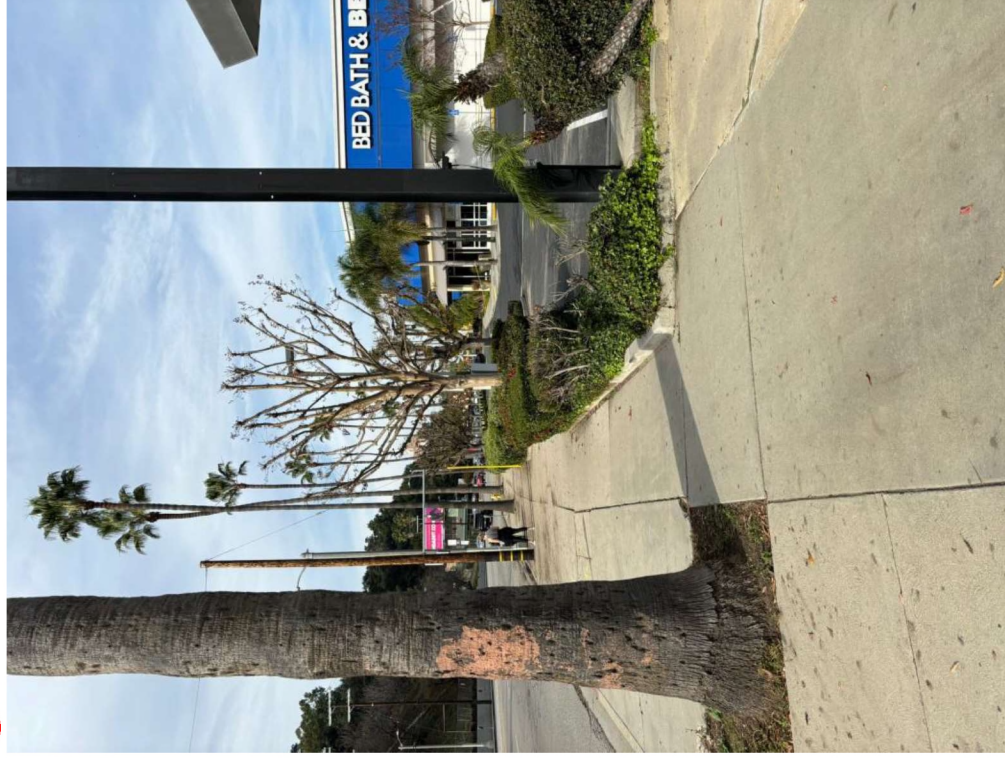
Facing northeast toward the Project Site on the north side of Ventura Blvd.

36



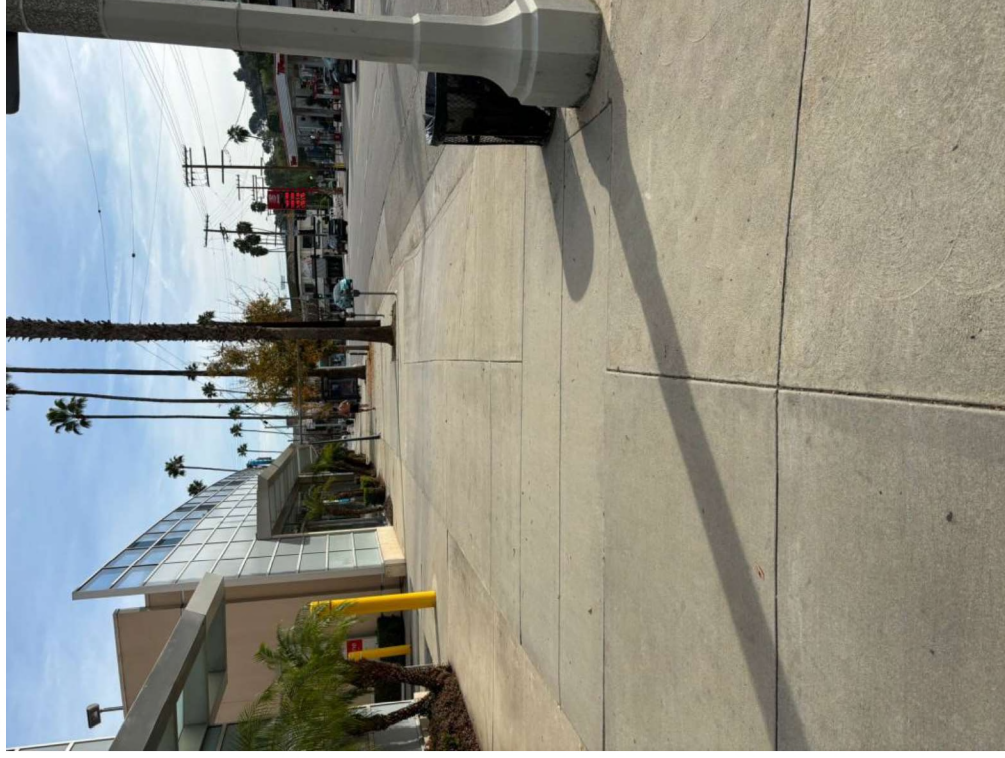
Facing east toward the Project Site on the north side of Ventura Blvd.

37



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

38



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

39



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

40



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

Appendix I
Tract Map

I.1 Purpose

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

I.2 Tract Map Status

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

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

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

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

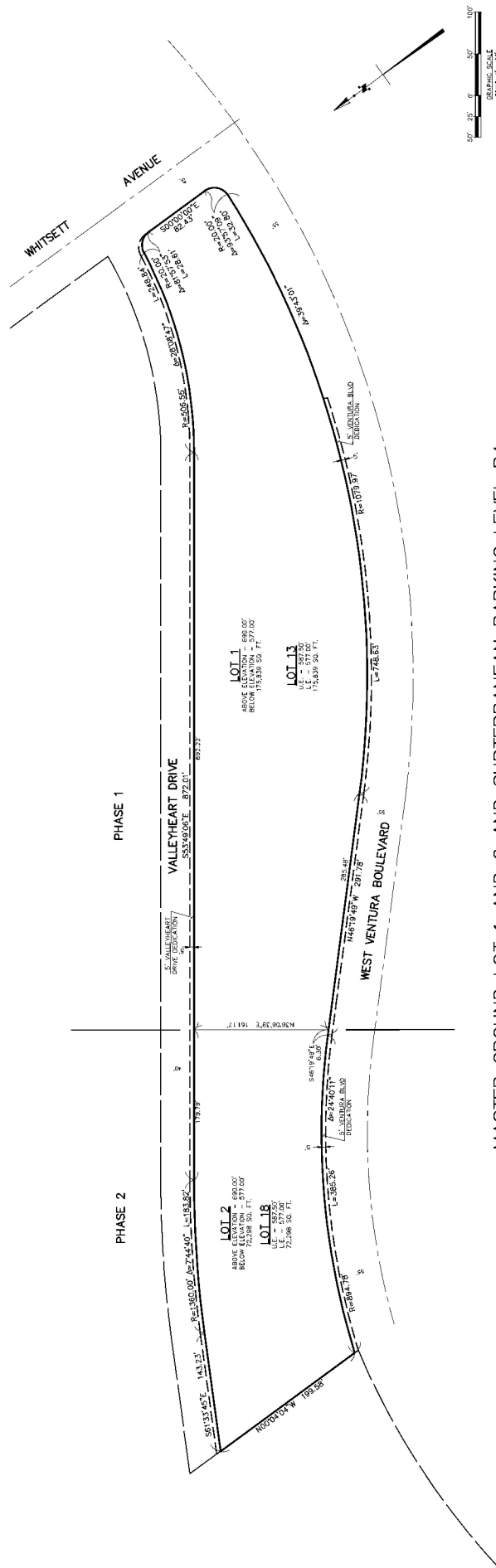
- **LAFD Inter-Departmental Correspondence — VTT-84453-HCA-REVISED (2/18/2026):** Adds the binding per-phase compliance condition: “The plot plans shall be approved by the Fire Department showing fire hydrants and access for each phase of the project prior to the recording of the final map for that phase. Each phase shall comply independently with code requirements.” See Appendix C, Exhibit C-2.
- **Phasing:** The phased structure of the tract map is documented in the Phasing Exhibit (PL-1TTM01_PHASE-EXHIBIT_25-0611, Psomas, dated 6/11/2025), provided as Appendix G, Exhibit G-2.

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

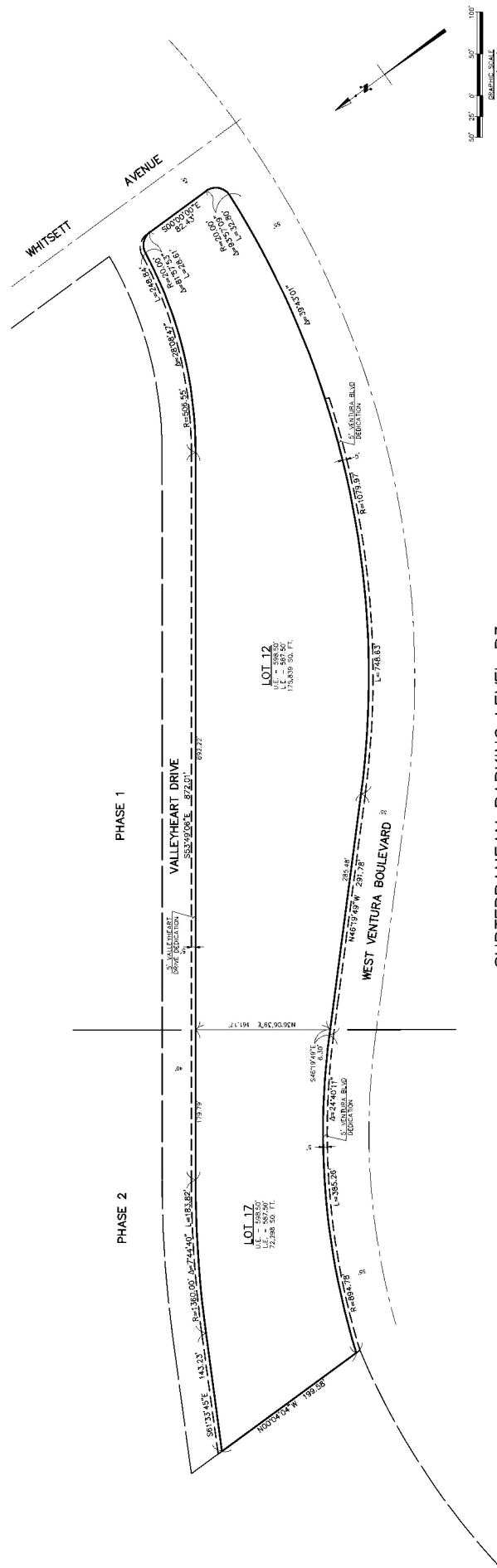
The substantive tract map record consists of the Vesting Tentative Tract Map (Exhibit I-1 of this appendix), the Bureau of Engineering Revised Report (Appendix C, Exhibit C-4), and the LAFD comment letters dated 12 November 2025 and 18 February 2026 (Appendix C, Exhibits C-1 and C-2). The Planning Commission’s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

I.5 Exhibit

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



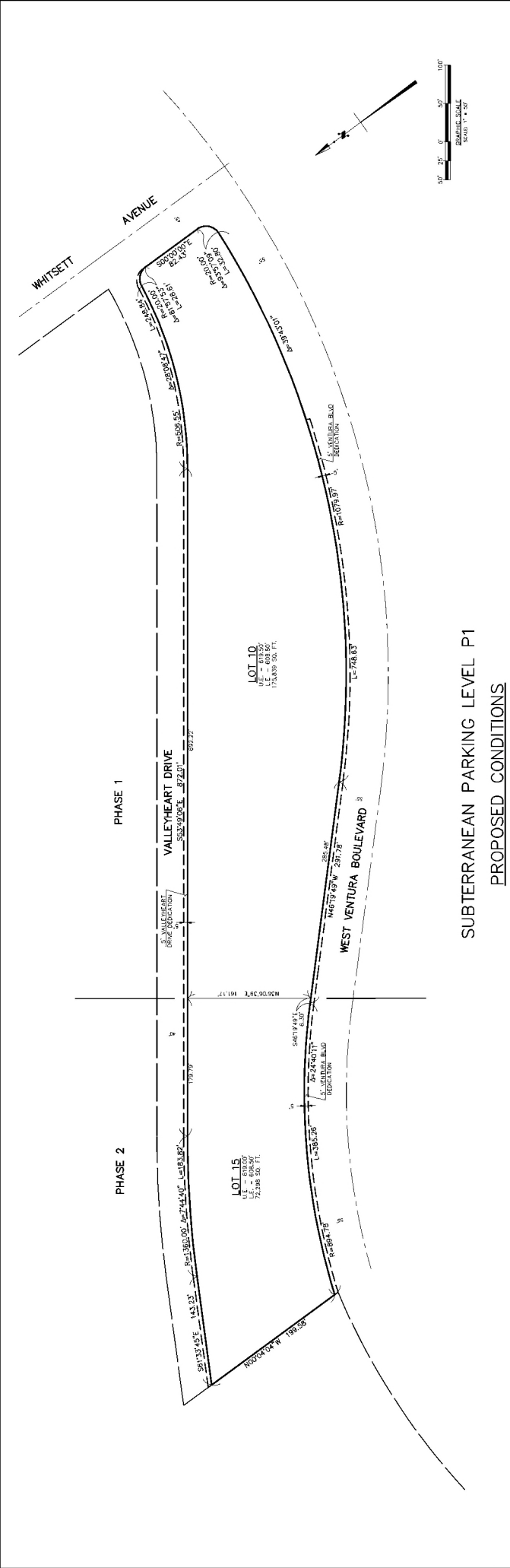
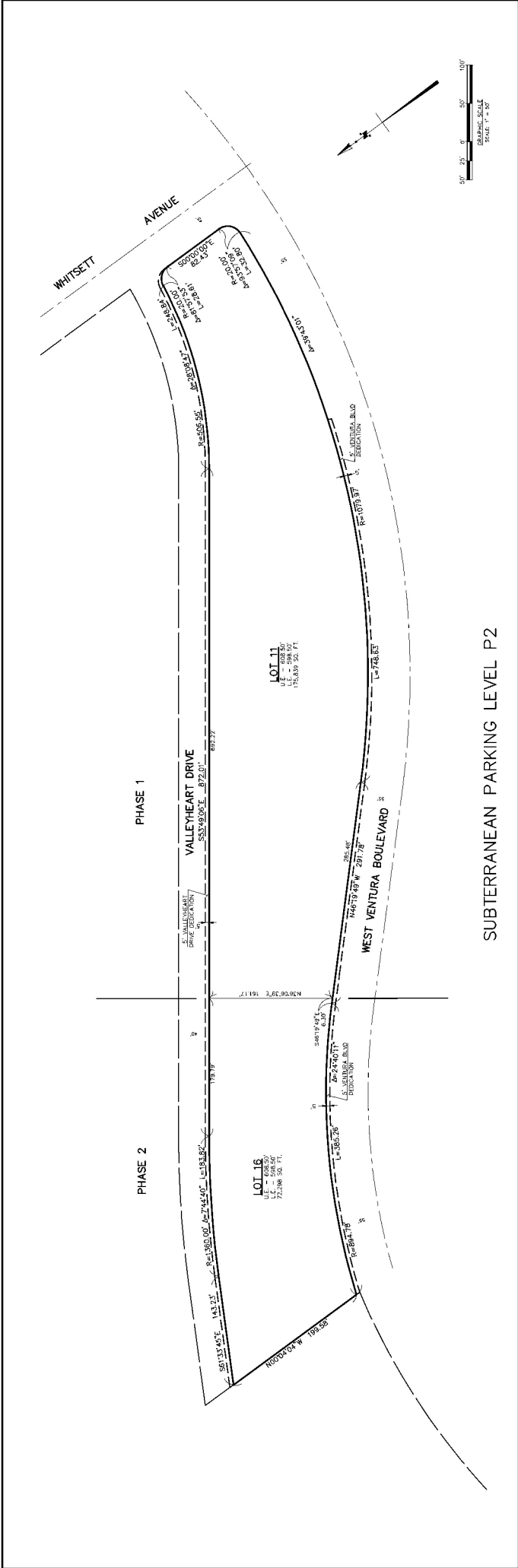
MASTER GROUND LOT 1 AND 2 AND SUBTERRANEAN PARKING LEVEL P4



SUBTERRANEAN PARKING LEVEL P3

PROPOSED CONDITIONS

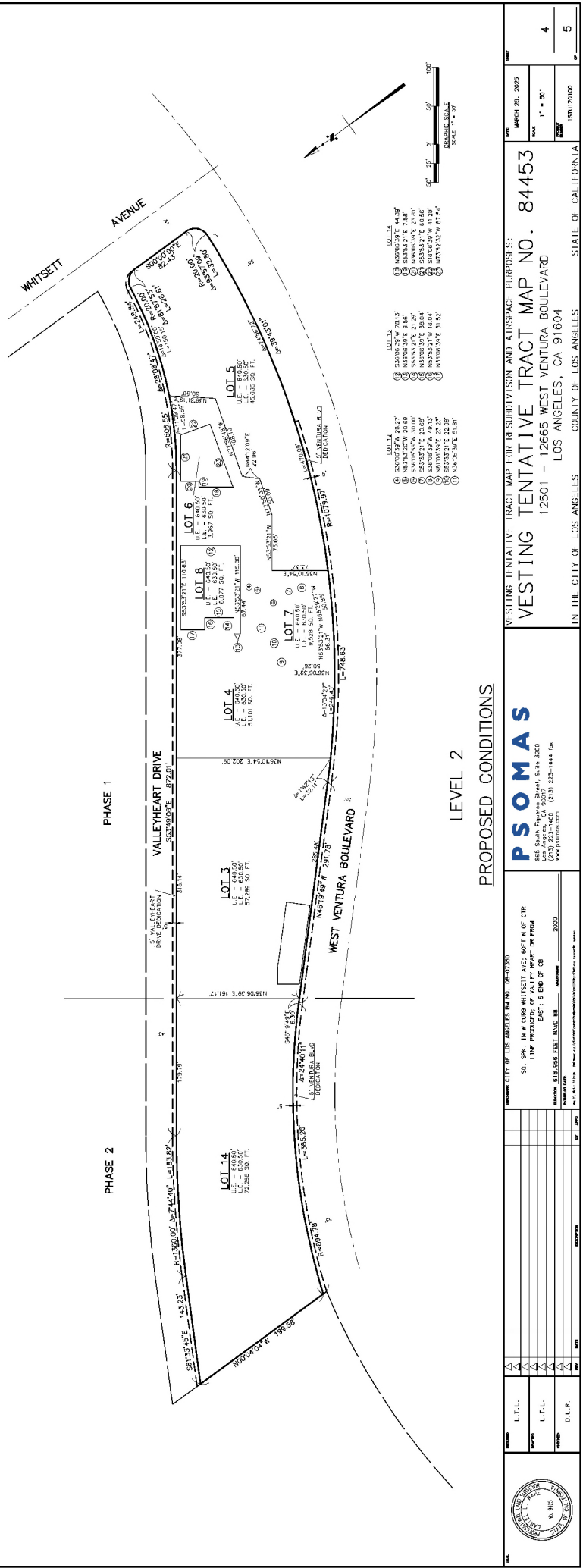
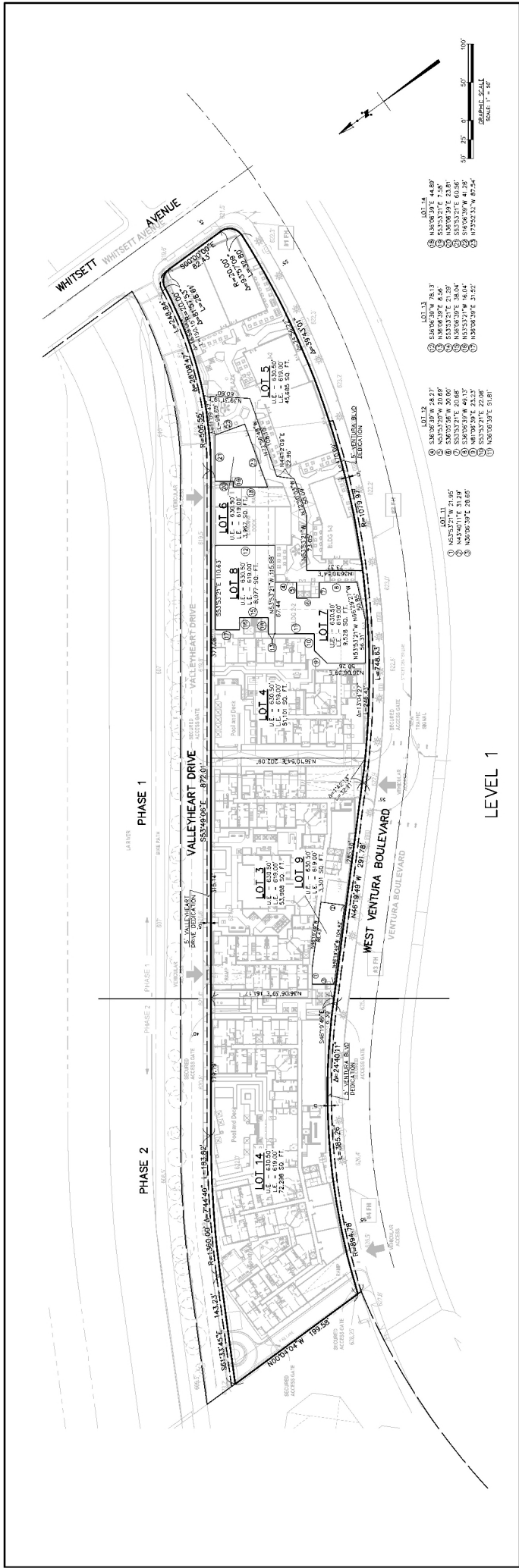
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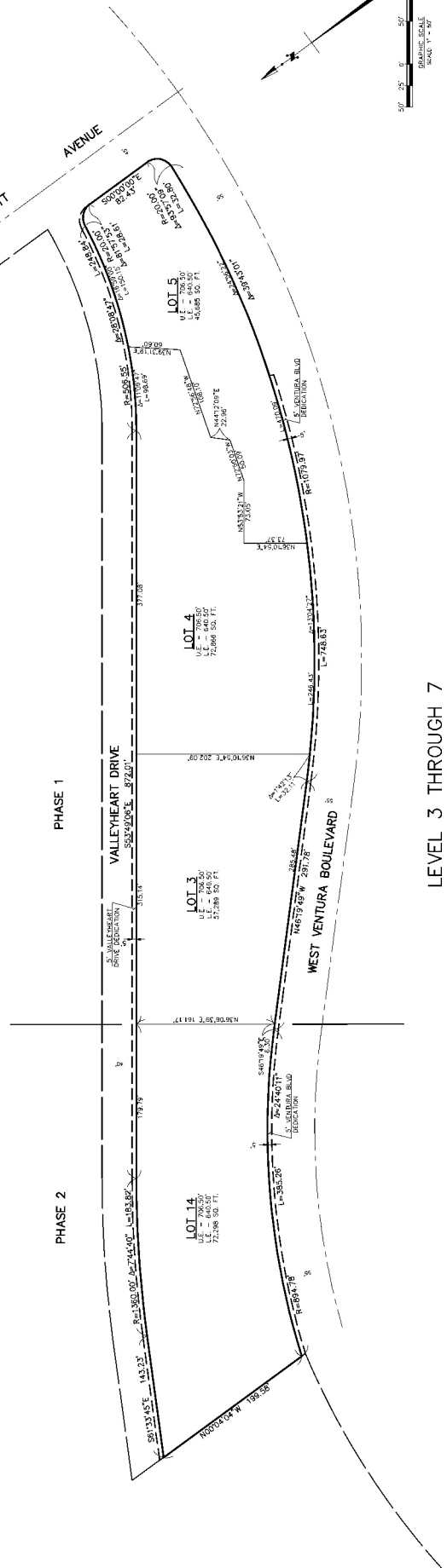


SUBTERRANEAN PARKING LEVEL P1

PROPOSED CONDITIONS

		PSOMAS 8000 Wilshire Blvd., Suite 3000 Los Angeles, CA 90047 (310) 223-1444 www.psomas.com		VESTING TENTATIVE TRACT MAP FOR RESUBDIVISION AND AIRSPACE PURPOSES: VESTING TENTATIVE TRACT MAP NO. 84453 12501 - 12665 WEST VENTURA BOULEVARD LOS ANGELES, CA 91604 IN THE CITY OF LOS ANGELES COUNTY OF LOS ANGELES STATE OF CALIFORNIA		DATE: MARCH 20, 2025 SHEET NO.: 3 SCALE: 1" = 50' TOTAL SHEETS: 5
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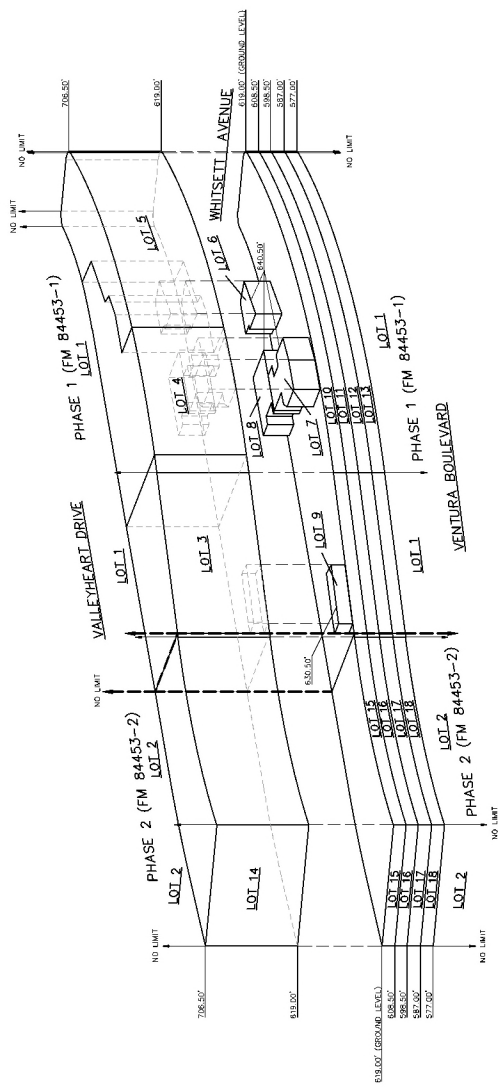
LEVEL 3 THROUGH 7
PROPOSED CONDITIONS

PROPOSED LOT INDEX:

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

PROPOSED PHASING INDEX:

- PHASE 1
- LOT 1
- LOT 2
- LOT 3
- LOT 4
- LOT 5
- LOT 6
- LOT 7
- LOT 8
- LOT 9
- LOT 10
- LOT 11
- LOT 12
- LOT 13
- LOT 14
- LOT 15
- LOT 16
- LOT 17
- LOT 18



ISOMETRIC

		IN THE CITY OF LOS ANGELES		COUNTY OF LOS ANGELES		STATE OF CALIFORNIA	
VESTING TENTATIVE TRACT MAP FOR RESUBDIVISION AND AIRSPACE PURPOSES:		VESTING TENTATIVE TRACT MAP NO. 84453		MARCH 20, 2025		5	
12501 - 12665 WEST VENTURA BOULEVARD		LOS ANGELES, CA 91604		1" = 50'		5	
1570/20100							