

April 13, 2026

Sheila Toni, Deputy Advisory Agency
Los Angeles City Hall
200 N. Spring Street
Los Angeles, CA 90012
Attn: Adrineh Melkonian
Adrineh.Melkonian@lacity.org

Dear Ms. Toni:

Re: 12555 W. Ventura Boulevard
VTT-84453; ENV-2025-5697-SE; CPC-2025-5697-DB-PR-S-PPC-MCUP-VHCA
Hearing Date: April 14, 2026 10:30am

Our firm represents Studio City Sports Center, LLC, the owner of the property located at 12555 W. Ventura Boulevard (the “Property”), and the applicant for the Riverwalk Project. We respectfully request that the Deputy Advisory Agency approve Vesting Tentative Tract Map (“VTTM”) 84453 and adopt the Statutory CEQA Exemption for urban infill housing development projects, as set forth in Public Resources Code (“PRC”) Section 21080.66.

1. Project Entitlements

The requested VTTM 84453 is a merger and re-subdivision of four legal parcels broken into eight portions into two master ground lots, three residential airspace lots, five commercial airspace lots, and eight parking airspace lots for the construction of a mixed use development consisting of 814 residential dwelling units, including 46 affordable units, and approximately 75,968 square feet commercial uses on a 261,485 square-foot lot in the C1.5-1VL-RIO Zone, as well as a haul route approval for the removal of approximately 521,000 cubic yards of dirt, and the removal of 240 non-protected trees from the project site and three (3) non-protected trees from public right-of-way. (the “Project”)

The Project entitlements also include a Statutory CEQA Exemption for urban infill housing development projects under PRC Section 21080.66, known as AB130. The City Staff Report, dated April 14, 2026, determined that based on the whole of the record, the Project is exempt from CEQA under this provision. The findings are described in detail below.

There is also an incidental case requesting entitlements for a Density Bonus, including off-menu incentives and waivers, Project Review for developments creating 50 or more dwelling units, and Project Compliance Review with the Ventura-Cahuenga Boulevard and Corridor Specific Plan (the “Specific Plan”), for the construction of a mixed-use project consisting of 814 residential dwelling units, including 46 affordable units, and approximately 75,968 square feet commercial

uses and a Class 2 Main Conditional Use Permit to allow the sale and dispensing of a full-line of alcohol for on- and off-site consumption in conjunction with the restaurants. These entitlements will be considered separately by the City Planning Commission.

2. AB130 Statutory CEQA Exemption

a. AB130 Checklist

On June 30, 2025, the California State Legislature passed AB130, which provided a statutory CEQA exemption for urban infill housing development projects that meet certain requirements, including residential/mixed-use types, property size (under 20 acres), urban area and use, zoning and general plan consistency (including density bonus waivers and concessions), and project location. (PRC §21080.66) As set forth in the AB130 CEQA Checklist, attached as Exhibit A, the Project fully complies with the AB130 requirements. The Project is a mixed-use housing development project with over 89% residential floor area (PRC 21080.66.(a)). The Property is 6.01 acres (PRC §21080.66.(a)(1)); located within the City of Los Angeles ((a)(2)); previously developed with retail, restaurants and entertainment uses ((a)(3)); and is consistent with the C1.5-1VL-RIO zone, Neighborhood Office Commercial land use designation, and the Specific Plan provisions based on approval of the Density Bonus concessions and waivers (Gov. Code §5915) ((a)(4)). The Project has a density of 1 dwelling unit per 321.7 square feet of lot area, which complies with the Metro density in Gov. Code §65583.2(c)(3)(B) (Housing Element) of 30 dwelling units per acre (1 dwelling unit per 1,492 square feet of lot area). ((a)(5)) The Property is not designated as a historic structure ((a)(7)); and does not include a hotel use ((a)(8)). The Property is not located within any of the designated areas listed in Gov. Code §65913.4 (a)(6), because it is not in a coastal zone, farmland, wetland, hazardous waste site, earthquake fault zone, special flood area, regulatory floodway, conservation area, protected habitat, lands under conservation easement, and there were no prior residential uses on the Property. (PRC 21080.66.(a) (6), (7))

b. State Fire Code Compliance within VHFHSZ

The Property is located in a Very High Fire Hazard Severity Zone (VHFHSZ); however, the Project is still exempt under CEQA if it complies with the fire safety provisions set forth in PRC §4291, PRC §51182, PRC §4290, and California Building Code 7A. As set forth in the Technical Memorandum for Riverwalk at Studio City by Dudek, dated September 26, 2025 (the "Fire Code Analysis"), the Project fully complies with the State laws (including PRC §4291 and §51182, PRC §4290, and CBC section 7A), City ordinances, and building and fire code requirements. These findings are summarized in detail in Exhibit A.

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

As determined by the Los Angeles Department of Water and Power, the Project has the infrastructure to comply with water supply and fire flow requirements and substantially complies

with fire apparatus access requirements. The Project provides the 200 feet of defensible space because it is located in a VHFHSZ, and the space includes the Los Angeles River and existing adjacent urban development and adjacent streets. The Project includes both ground-level and rooftop landscaping, which is required to be approved by LAFD Fuel Modification Plan Checkers who evaluate each project independently based on site, hazard, and vegetation characteristics. The Fire Code Analysis evaluates the proposed landscaping and concludes that it complies with the code requirements. The entirety of the trees and shrubs proposed for the Project will be reviewed and approved by the LAFD.

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

c. AB130 Review Period

AB130 also provides for streamlined review and specific timelines for Project approval, as set forth in Exhibit B. AB130 requires City review and approval within 30 days after the City deems the project application complete and completes the tribal consultation. In summary, AB130 requires that the city review the application and determine completeness within 30 days (Gov. Code §65943) Here, the applicant filed the project application on October 14, 2025, the City issued a timely hold letter, and deemed the application complete on March 16, 2026. The city must conduct Native American Tribe consultation within a maximum of 148 days by sending a notice to the tribes within 14 days, receiving a response from the tribes within 60 days, beginning consultation within 14 days, and completing the consultation within 60 days (PRC §§21080.66.a,b,c). Here, the City completed consultation with two tribes in January 2026. Then, if the project is exempt from CEQA, the City must approve or disapprove the project within thirty days from the conclusion of the tribal consultation projects (set forth in PRC §21080.66 (b))(Gov. Code §65950(a)). All time limits specified in this article are maximum time limits for approving or disapproving development projects. (Gov. Code §65953(a)) In the event that a lead agency or a responsible agency fails to act to approve or to disapprove a development project within the time limits required by this article, the failure to act shall be deemed approval of the permit application for the development project. (Gov. Code §65956(b)). Here, the City completed the tribal consultations in January 2026, and deemed the application complete on March 16, 2026; therefore, the City must act on the Project by April 15, 2026.

3. Housing Accountability Act

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

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

“A specific, adverse impact means a significant, quantifiable, direct and unavoidable impact, based on objective, identified written public health or safety standards, policies, or conditions as they existed on the date the application was deemed complete.” (Gov'n Code §65589.5.(d)(2)) Therefore, the City can only deny the off-menu incentives and waivers for a Density Bonus Project if it finds a specific adverse impact to public health and safety. If the City fails to approve a housing development project, the applicant may bring a claim, and obtain attorney's fees, if the court determines that the City acted in bad faith. See *District Square, LLC v. City of Los Angeles* (Case No. 20STCP00654) and *Cesar Chavez 888, LLC v. City of Los Angeles* (Case No. (24STCP01880) The Project does not cause any specific, adverse impacts to public health or safety.

4. Conclusion

In conclusion, the mixed-use housing development project fully complies with the requirements for a statutory CEQA exemption under AB130 for urban infill housing development projects. In addition, the Project does not cause any specific adverse impacts to public health and safety under the HAA. Therefore, we respectfully request that the Deputy Advisory Agency approve VTTM 84453, and determine the statutory CEQA Exemption under AB130 applies to the Project.

Sincerely,



Sheri L. Bonstelle

SLB

Cc: Mashaël Majid, CD4 Chief of Staff (Mashaël.Majid@lacity.org)

EXHIBIT A

Project: Riverwalk at Studio City Checklist

No.	Code	Standard	Project	Comply
1.	PRC 21080.66.(a)	CEQA does not apply to a housing development project if it meets all of the following requirements (Gov'n Code 69505.5, 65589.5(h)(2)) - proposal to construct a single dwelling unit - residential project - mixed use project (2/3 residential sf, or 50% residential sf with qualifications) - transitional housing - farmworker housing	89.6% residential floor area - 75,968 sf com - 650,854 sf res - 726,822 sf total	Yes
2.	PRC 21080.66.(a) (1)	- Not more than 20 acres, or - Not more than 5 acres for a builders remedy project	6.01 acres (261,870 sf)	Yes
3.	PRC 21080.66.(a) (2)	- Located in an incorporated municipality, or - Located in an urban area (as defined)	City of LA – incorporated municipality	Yes
4.	PRC 21080.66.(a) (3)	- Previously developed with urban use, or - 75% of perimeter adjoins developed urban uses, or - 75% or area within ¼ mile developed urban uses, or - ¾ sides and 2/3 perimeter developed urban uses.	Developed with big box retail, retail, restaurants, bank, martial arts studio, bowling alley	Yes
5.	PRC 21080.66.(a) (4)	- Consistent with general plan, or - Consistent with zoning ordinance, and - Consistent with local coastal plan - Density Bonus, incentives or concessions, waivers or reductions of development standards, reduced parking ratios under Gov'n Code 65915 not grounds for determining project is inconsistent with general plan, zoning or local coastal plan.	Consistent with -C1.5-1VL-RIO zone -Neighborhood Office Commercial land use designation - Ventura/Cahuenga Boulevard Corridor Specific Plan With Density Bonus and incentives/waivers	Yes

No.	Code	Standard	Project	Comply
			for density, FAR, lot coverage, height, rear yard setback, transitional height, averaging setbacks.	
6.	PRC 21080.66.(a) (5)	At least ½ density specified in Gov'n Code 65583.2(c)(3)(B) (Housing Element): - Metro: 30du/acre (1 du / 1,492 sf lot area) - Suburb: 20 du/acre - Nonmetro, unincorporated: 10 du/acre - Nonmetro, incorporated: 15 du/acre	1 du/321.7 sf lot area complies with Metro density - 261,870 sf lot / 814 du	Yes
7.	PRC 21080.66.(a) (6) Gov'n Code 65913.4 (a)(6)	A. Not in coastal zone area subject to PRC 30603 (1,2) - Coastal zone area not subject to LCP or LUP - Coastal zone area subject to 5' rise - Coastal zone area not zoned for multifamily - Coastal zone area in wetland or farmland	N/A	Yes
8.	PRC 21080.66.(a) (6) Gov'n Code 65913.4 (a)(6)	B. Prime farmland	N/A	Yes
9.	PRC 21080.66.(a) (6) Gov'n Code 65913.4 (a)(6)	C. Wetlands	N/A	Yes
10.	PRC 21080.66.(a) (6) Gov'n Code 65913.4 (a)(6)	D. Very high fire hazard severity zone or state responsibility area, unless it complies with: - PRC 4291, 51182 - PRC 4290 - CBC 7A	Located in VHFHSZ, and will comply with: - PRC 4291, 51182 - PRC 4290 - CBC 7A	Yes
11.	PRC 21080.66.(a) (6) Gov'n Code 65913.4 (a)(6)	E. Hazardous waste site , unless: -- Underground storage tank site with uniform closure letter -- State Dept determined site suitable for residential or mixed use	N/A	Yes
12.	PRC 21080.66.(a) (6) Gov'n Code 65913.4 (a)(6)	F. Designated earthquake fault zone	N/A	Yes

No.	Code	Standard	Project	Comply
13.	PRC 21080.66.(a) (6) Gov'n Code 65913.4 (a)(6)	G. Special Flood Area subject to 100-year flood, unless: -- Letter of Map Revision, or -- Meets FEMA or NFIP requirements for minimum flood plan management	N/A	Yes
14.	PRC 21080.66.(a) (6) Gov'n Code 65913.4 (a)(6)	H. Regulatory floodway determined by FEMA, unless no rise certification	N/A	Yes
15.	PRC 21080.66.(a) (6) Gov'n Code 65913.4 (a)(6)	I. Identified for conservation in a natural community conservation plan, habitat conservation plan or other natural resource protection plan	N/A	Yes
16.	PRC 21080.66.(a) (6) Gov'n Code 65913.4 (a)(6)	J. Habitat for protected species	N/A	Yes
17.	PRC 21080.66.(a) (6) Gov'n Code 65913.4 (a)(6)	K. Lands under conservation easement	N/A	Yes
18.	PRC 21080.66.(a) (7)	No demolition of structures if: - housing subject to covenant, ord, or law that restricts to moderate, low, very low income - demolition of residential units within past 10 years if tenants - historic structure on the national, state or local historic register - housing units occupied by tenants, and the units were subsequently offered for sale	No residential use on Property, and no residential use within prior 10 years. No registered historic structure on federal, state or local register	Yes
19.	PRC 21080.66.(a) (8)	After 1/1/2025, no project with a hotel, motel, B&B, other transient lodging, including residential hotel.	No hotel use	Yes
20.	PRC 21080.66.(b)	Government notification to Native American tribe to consult on project and tribal cultural resources: - Notice within 14 days of deemed complete application - Tribe has 60 days to accept consult - 45 day consultant with 15 day extension - Provides monitoring mitigation requirement	Required consultation with the tribes	Yes
21.	PRC 21080.66.(c)(1)(a)	Require a Phase I Env. Assessment as a condition of approval of development.	Required Phase I as condition of approval	Yes

No.	Code	Standard	Project	Comply
22.	PRC 21080.66.(c)(2)	For housing within 500 feet of a freeway	4,490 feet from 101 freeway	Yes
23.	PRC 21080.66.(d)(1)	For 100% low income affordable housing developments, must be paid prevailing wage for type of work	N/A	Yes
24.	PRC 21080.66.(d)(2)	For buildings over 85 feet in height above grade must comply with prevailing wage provisions (Gov'n Code 65913.4(a)(8))	Project is less than 85 feet in height above grade.	Yes
25.	PRC 21080.66.(d)(3)	For projects with 50 units or more in San Francisco , specific prevailing wage provisions apply	N/A	Yes
26.	PRC 21080.66.(e)	This CEQA exemption does not affect the eligibility for a density bonus, incentives, concessions or waivers (Gov'n Code 65915)	The Project is a Density Bonus project	Yes

I. Findings

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

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

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

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

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

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

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

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

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

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

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

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

The project must have a minimum residential density of at least half of the residential density specified in Gov'n Code 65583.2(c)(3)(B) (Housing Element), which is 30 dwelling units per acre (1 du/1,495 sf lot area) for Metro areas, and 20 dwelling units/acre for Suburban areas. The project is located in a Metro area in the City of Los Angeles. The proposed density is one dwelling unit per 321.7 square feet of lot area (261,870 sf lot / 814 du), which exceeds the Metro minimum density of one unit per 1,495 square feet of lot area. Therefore, the Project qualifies.

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

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

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

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

1. PRC 4291 and 51182

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

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

fuel modification zone, which is a 5-foot ember-resistant zone around structures in designated LRA VHFHSZs

2. **PRC 4290**

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

3. **CBC section 7A**

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

4. **Project Compliance**

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

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

As determined by the Los Angeles Department of Water and Power, the Project has the infrastructure to comply with water supply and fire flow requirements and substantially complies with fire apparatus access requirements. The Project provides the 200 feet of defensible space because it is located in a VHFHSZ, and the space includes the Los Angeles River and existing adjacent urban development and adjacent streets. The Project includes both ground-level and rooftop landscaping, which is required to be approved by LAFD Fuel Modification Plan Checkers who evaluate each project independently based on site, hazard, and vegetation characteristics. The Fire Code

Analysis evaluates the proposed landscaping and concludes that they comply with the code requirements. The palm species that are existing on the Project site and proposed to remain are limited to Fuel Modification Zone B. Some of the proposed new trees and shrubs have limitations with regard to fuel modification zone, proximity to structure, and height. The entirety of the trees and shrubs proposed for the Project will have to be reviewed and approved by the LAFD.

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

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

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

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

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

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

EXHIBIT B

No.	Item	Time Frame	Code Section	Project Dates
1	Deemed complete application	30 days	Gov'n Code 65943. (a) Not later than 30 calendar days after any public agency has received an application for a development project, the agency shall determine in writing whether the application is complete and shall immediately transmit the determination to the applicant for the development project. . . (b) Not later than 30 calendar days after receipt of the submitted materials described in subdivision (a), the public agency shall determine in writing whether the application as supplemented or amended by the submitted materials is complete and shall immediately transmit that determination to the applicant. . . Gov'n Code 65589.5h: (5) Notwithstanding any other law, "deemed complete" means that the applicant has submitted a preliminary application pursuant to Section 65941.1 or, if the applicant has not submitted a preliminary application, has submitted a complete application pursuant to Section 65943. The local agency shall bear the burden of proof in	Project filed on: 10/10/2025 Hold Letter issued on: 11/7/2025 City deemed complete on: 3/16/2026

No.	Item	Time Frame	Code Section	Project Dates
			establishing that the application is not complete.	
2	Tribal Consultation	148 days maximum City, Applicant and Native American tribe to consult on project and tribal cultural resources: City sends notice to Tribe within 14 days of deemed complete application	PRC 21080.66.b1A: (i) Within 14 days of the application for the project being deemed complete pursuant to paragraph (5) of subdivision (h) of Section 65589.5 of the Government Code.	City notice sent to tribes on: 11/17/2025
		Tribe has 60 days to accept the invitation to consult	PRC 21080.66.b2: (A) Each California Native American tribe has 60 days to notify the local government that it accepts the invitation to consult. (B) If a California Native American tribe chooses not to accept the invitation to consult, or does not notify the local government of its decision within 60 days, the consultation shall be considered to have concluded.	Tribe must accept consultation by 1/16/2026. Two tribes responded within the time period.
		City shall initiate consultation within 14 days .	PRC 21080.66.b3: (A) Within 14 days of receiving the notification that the California Native American tribe has elected to	

No.	Item	Time Frame	Code Section	Project Dates
			consult, pursuant to subparagraph (A) of paragraph (2), the local government shall initiate the consultation.	
		City, Tribe and Applicant shall consult for 45 days with a 15 day extension	PRC 21080.66.b3: (F) The consultation shall conclude within 45 days of initiation, subject to a one-time 15-day extension upon request by a participating California Native American tribe.	Consultation commenced. Gabrieleno Band of Mission Indians – Kizh Nation commenced consultation and then submitted proposed conditions prior to 12/15/2025. Consultation completed on or before 1/29/26 (45 days after initiating consultation). Applicant accepted conditions. Fernando Tataviam Band of Mission Indians identified the project as "below the threshold of low sensitivity" and so consultation is not required, but submitted proposed conditions on 11/19/2025. Close of consultation letter submitted on 11/26/2025. Applicant accepted conditions.
3	City Action	30 days after completion of the tribal consultation (as set forth in PRC	Gov'n Code 65950. (a) A public agency that is the lead agency for a development project shall approve or disapprove the	The project complies with AB130 (PRC 21080.66). The tribal consultation was completed on

No.	Item	Time Frame	Code Section	Project Dates
		21080.66(b)) (if exempt from CEQA under AB130, PRC 21080.66), or 60 days after determination that the project is otherwise exempt from CEQA under PRC 21000.	project within whichever of the following periods is applicable: (5) Sixty days from the determination by the lead agency that the project is exempt from the California Environmental Quality Act (Division 13 (commencing with Section 21000) of the Public Resources Code), if the project is exempt from that act. (7) Thirty days from the conclusion of the process outlined in subdivision (b) of Section 21080.66 of the Public Resources Code, if a development project is exempt from the California Environmental Quality Act (Division 13 (commencing with Section 21000) of the Public Resources Code) pursuant to Section 21080.66 of the Public Resources Code.	1/29/2026 when the two tribes completed consultation, and no other tribes requested consultation. The project application was deemed completed on 3/16/2026. 30 days after completion of the tribal consultation (which was required to commence 30 days after the application is deemed complete), and 30 days after the project is deemed complete is 4/15/2026.
4	Approval Timelines	AB130 time limits are maximums	Gov'n Code 65953. (a) All time limits specified in this article are maximum time limits for approving or disapproving development projects. All public agencies shall, if possible, approve or disapprove development projects in shorter periods of time. (b) All time limits specified in this article shall only apply to the extent that the time limits are equal to or shorter than the applicable time	

No.	Item	Time Frame	Code Section	Project Dates
			limits for public agency review established in any other law.	
5	Failure to Act within Timeframes	City's failure to act within time frames is deemed an approval of the project. Applicant may bring an action for failure to timely provide hearing notice.	Gov'n Code 65956. (a) If any provision of law requires the lead agency or responsible agency to provide public notice of the development project or to hold a public hearing, or both, on the development project and the agency has not provided the public notice or held the hearing, or both, at least 60 days prior to the expiration of the time limits established by Sections 65950 and 65952, the applicant or the applicant's representative may file an action pursuant to Section 1085 of the Code of Civil Procedure to compel the agency to provide the public notice or hold the hearing, or both, and the court shall give the proceedings preference over all other civil actions or proceedings, except older matters of the same character. (b) In the event that a lead agency or a responsible agency fails to act to approve or to disapprove a development project within the time limits required by this article, the failure to act shall be deemed approval of the permit application for the development project.	

No.	Item	Time Frame	Code Section	Project Dates
			(c) Failure of an applicant to submit complete or adequate information pursuant to Sections 65943 to 65944, inclusive, may constitute grounds for disapproving a development project. (d) Nothing in this section shall diminish the permitting agency's legal responsibility to provide, where applicable, public notice and hearing before acting on a permit application.	