

June 8, 2026

VIA E-MAIL

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

Re: 12555 W. Ventura Boulevard
Response to City Staff Report for CPC-2025-5697-DB-PR-S-PPC-MCUP-VHCA
Related Case: VTT-84453 and ENV-2025-5697-SE
CPC Hearing Date: Thursday, June 11, 2026 Item 8

Dear President Lawshe and Members of the City Planning Commission:

Our firm represents Studio City Sports Center, LLC, (the “***Applicant***”) the owner of the property located at 12555 W. Ventura Boulevard (the “***Property***”), and the applicant for the Riverwalk Project. This letter responds to the City Planning Staff Report, dated June 11, 2026, (the “***Staff Report***”) for the Density Bonus and related entitlements for the mixed-use housing development project (the “***Project***”). We respectfully request that the City Planning Commission (“***CPC***”) approve the entitlements for the Project, and determine that the Project is statutorily exempt under the California Environmental Quality Act (“***CEQA***”), Public Resources Code §21080.66. The Applicant’s letter with exhibits to the CPC, dated May 29, 2026, responding to the Appeal for VTT-84453, (the “***Applicant Letter***”) is incorporated herein in its entirety by reference as it applies to the Density Bonus and related entitlements. This letter complies with the CPC’s rules for secondary submissions.

I. City Planning Staff Report Comments

Parking. The Staff Report identifies the Property as located within one-half mile of a major transit stop. AB2097 (Gov. Code §65863.2) prohibits a public agency from imposing or enforcing any minimum automobile parking requirements on any residential, commercial, or other development project within this distance (Staff Report, A-2). However, the closest major transit stop is located at Ventura Boulevard and Laurel Canyon Boulevard, which is just over one-half mile from the Property. Therefore, the Project is not exempt from parking requirements under AB2097, and instead fully complies with the required parking for a Density Bonus Project under State law and the Los Angeles Municipal Code (“***LAMC***”).

The Project provides 1,806 vehicle parking spaces, including 1,040 residential parking spaces and 766 commercial parking spaces in four subterranean parking levels. Vehicle parking for the residential component is governed by LAMC §12.21 A.4(a), which dictates a ratio based on habitable rooms: one space for units with fewer than three rooms, 1.5 spaces for units with three rooms, and two spaces for units with more than three rooms. Therefore, the 814 dwelling units would require 923 residential parking spaces. (Staff Report, F-16) The Project also qualifies for parking reduction under Density Bonus law. (LAMC §12.22.A.37(e)(2), Table 12.22 A.37.(e)(2)(ii)a) Based on Section 7.F.1.a of the Ventura/Cahuenga Boulevard Corridor Specific Plan (the “*Specific Plan*”), restaurant uses must provide a minimum of one parking space for every 100 square feet of floor area. The Project’s 75,968 square feet of restaurant space requires 760 vehicle parking spaces. (Staff Report, F-16) Therefore, the Project’s parking meets or exceeds the LAMC and Specific Plan parking requirements, including for Density Bonus projects.

The Project also provides 354 residential bicycle spaces and 78 commercial bicycle spaces, in compliance with LAMC §12.21.A.16.(a)(1,2) (Staff Report F-11,12). The Project fully complies with the Electric Vehicle parking and charging station requirements (LAMC §§99.04.106 and 99.05.106)

We request that Condition 15 (Report, C-2) be amended to read:

“15. **Parking.**

- a. **Automobile Parking.** Parking for the residential and commercial uses in a Density Bonus housing development project shall be provided in compliance with LAMC Section 12.22.A.37(e)(2), Table 12.22 A.37.(e)(2)(ii)a) and Section 7.F.1.a of the Ventura/Cahuenga Boulevard Corridor Specific Plan.
- b. **Bicycle Parking.** Bicycle parking shall be provided in compliance with LAMC Section 12.21.A.16.
- c. **Electric Vehicle Parking.** All electric vehicle charging spaces (EV Spaces) and electric vehicle charging stations (EVCS) shall comply with the regulations outlined in Sections 99.04.106 and 99.05.106 of Article 9, Chapter IX of the LAMC, to the satisfaction of the Department of Building and Safety.”

Density. The Project density of 814 units is permitted with a Density Bonus under LAMC §12.22.A.37 (previously located in LAMC §12.22.A.25). The Property’s lot area is 261,240 square feet, and the C1.5 zone permits a density of one unit per 400 square feet of lot area (LAMC §12.13.5.C.3). This provides a base density of 653 units. The Project provides 7% of the base units (46 units) as affordable to Very Low Income Households. Therefore, the Project is granted a Density Bonus under State law of 25% of the base density, which is 164 units, for a total of 817 units (Table §12.22 A.37.(e)(1)(i)a). The Project is within the density permitted. The Staff Report correctly summarizes this requirement, but has a typographical error for the total permitted number of units, and for the LAMC reference to density bonus provisions (Staff Report, A-6, F-2).

Signage. The Staff Report Condition 18(e) limits the signage type to channel letters, but the Project proposes canopy signs, wall signage signs that will be non-illuminated or illuminated sign panels or channel letters. We request that Condition 18 be modified to allow multiple types of signage permitted under the Specific Plan.

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

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 Staff Report, and supported by substantial evidence in the record, the Project complies with the AB130 requirements.

AB130 Requirements. AB130 has a checklist of specific requirements to qualify for the CEQA exemption (PRC §21080.66 (a)) (See Applicant Letter, Exhibit A) 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 (less than 20 acres) (PRC §21080.66.(a) (1)); located within the City of Los Angeles ((a)(2)); previously developed with retail, restaurants and entertainment uses ((a)(3)); and is consistent with the C1.5-1VL-RIO zone, Neighborhood Office Commercial land use designation, and the Specific Plan provisions based on approval of the Density Bonus concessions and waivers (Gov. Code §65915) ((a)(4)). The Project has a density of one dwelling unit per 321.7 square feet of lot area, which complies with the minimum Metro density in Gov. Code §65583.2(c)(3)(B) (Housing Element) of 30 dwelling units per acre (1 dwelling unit per 1,492 square feet of lot area) ((a)(5)). The Property is not designated as a historic structure ((a)(7)); and does not include a hotel use ((a)(8)). The Property is not located within any of the designated areas listed in Gov. Code §65913.4 (a)(6), because it is not in a coastal zone, farmland, wetland, hazardous waste site, earthquake fault zone, special flood area, regulatory floodway, conservation area, protected habitat, lands under conservation easement, and there were no prior residential uses on the Property (PRC §21080.66.(a) (6),(7)). The Project is within a Very High Fire Hazard Severity Zone (“**VHFHSZ**”), but complies with the State Fire Code laws that otherwise allow the Project in the zone (PRC §21080.66.(a)(6), Gov. Code §65913.4 (a)(6)).

Fire Code Compliance. The Property is located in a Very High Fire Hazard Severity Zone; however, pursuant to PRC §21080.66(a)(6), the Project is still exempt from CEQA if it complies with the fire safety provisions set forth in PRC §4291, PRC §51182, PRC §4290, and California Building Code (“**CBC**”) §7A, which has been updated by the wildland-urban interface (“**WUI**”) building standards, currently contained in the California Wildland-Urban Interface Code (“**CWUIC**”) 2025, Part 7 (effective January 1, 2026). As set forth in the Staff Report, the Project will require approval from the Fire Department and the Department of Building and Safety prior to building permit issuance. Public safety services are provided by the Los Angeles Police Department's Valley Bureau, North Hollywood Station (Reporting District 1591), and the Los Angeles Fire Department's Valley Bureau, Battalion 14, Fire Station 78. (Staff Report A-4) To ensure robust emergency access and preparedness, the Project is conditioned to incorporate numerous LAFD safety mandates. These include maintaining dedicated fire lanes of at least 20 feet in width-expanding to 28 feet where aerial ladder apparatus or fire hydrants are required. Additionally, the Project must ensure all structures are within 300 feet of an approved fire hydrant and mandate that no dwelling unit entrance is more than 150 feet from the edge of a roadway or approved fire lane. Furthermore, the building must be equipped with approved emergency responder radio coverage to ensure seamless communication for first responders, alongside Knox Boxes for rapid LAFD access. (Staff Report A-18, 19, F-2, F-7, F-11) Prior to the issuance of

building permits, the Applicant shall demonstrate compliance with Public Resources Code Section 4290 and its implementing regulations in Title 14, Division 1.5, Chapter 7, Subdivision 2 (State Minimum Fire Safe Regulations) and Chapter 7 of the California Building Code (Staff Report, Condition 23).

As set forth in the *Technical Memorandum for Riverwalk at Studio City* by Dudek, dated September 26, 2025 (the "**Dudek Fire Code Analysis**"), the Project fully complies with the State laws (including PRC §4291 and §51182, PRC §4290, and CBC §7A, WUI building standards, City ordinances, and building and fire code requirements. (Staff Report F-3) These findings are summarized in detail in the Applicant Letter, Exhibit A, and Dudek Fire Code Analysis is attached to the Applicant Letter, as Exhibit B. The *Technical Review: Wildfire Management Features*, dated May 29, 2026, by SGH, confirms that the Project will fully comply with the State laws, and other Fire and Building Code requirements, which are reviewed as part of the building permit plan check process ("**SGH Wildfire Management Review**"). The SGH Wildfire Management Review provides a full analysis of the site-specific exposure assessment (Section 5.2), fire-resistant construction (Section 6.1), emergency access and fire hydrant locations (Section 6.2), defensible space (6.3), and fire protection features (Section 6.4). The SGH Wildfire Management Review is attached to the Applicant Letter, as Exhibit C. The Dudek Fire Code Analysis and SGH Wildfire Management Review constitute substantial evidence in the record that the Project complies with State and local fire codes. 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.

The Project complies with the State Minimum Fire Safety Regulations, as designed, because it is set back 30 feet from adjacent property lines and street centerlines, as required, and the Department of Building and Safety has the authority to reduce the setbacks if the buildings provide fire-safe design in compliance with current Fire Codes. CCP §1276.01 states: "A reduction in the minimum setback shall be based upon practical reasons, which may include but are not limited to, parcel dimensions or size, topographic limitations, Development density requirements or other Development patterns that promote low-carbon emission outcomes; sensitive habitat; or other site constraints, and shall provide for an alternative method to reduce Structure-to-Structure ignition by incorporating features. . ." The Department of Building and Safety will review and ensure compliance during building permitting, as required by Condition 23 and State law. The residential and commercial buildings on the Project are designed to comply with most updated CBC, Chapter 7A and 2025 CWUIC Part 7 provisions, and therefore provide an alternative compliance under §1276.01(b). This analysis is set forth in detail in the referenced SGH Wildfire Management Review, and the Applicant Letter.

AB130 Process. The City accepted the application for review on October 10, 2025, completed the tribal consultations in January 29, 2026, and later deemed the application for the housing development project application complete on May 16, 2026. The City must approve or disapprove the project within thirty days from the conclusion of the tribal consultation projects, after the application has been deemed complete (PRC §21080.66 (b))(Gov. Code §65950(a)), and

must determine that the Project is inconsistent with an applicable plan, program, policy, ordinance, standard, requirement or other similar provision within 60 days after the application has been deemed complete for projects with 150 units or more. (Gov. Code §65589.5(j)(2)(A)) The Deputy Advisory Agency held the joint Hearing Officer hearing and Advisory Agency hearing on April 14, 2026, and the Advisory Agency issued the Letter of Determination approving the VTTM and the AB130 CEQA Exemption on April 15, 2026. The Notice of Exemption was posted and recorded on April 20, 2026. The 60-day consistency period lapsed on May 15, 2026. The City failed to take a final action on the Density Bonus entitlements within the 30-day timeframe under Gov. Code §65950(a), and the entitlements are deemed approved.

No AB130 Exceptions. For certain statutory CEQA Exemptions, including AB130, there are no exceptions to the exemption that are otherwise provided for categorical exemptions (CEQA Guidelines §15260 *et seq.*). Therefore, the exceptions for location, cumulative impact, significant effect due to unusual circumstances, scenic highways, unusual circumstances, hazardous waste sites, and historic resources do not apply to specific AB130 exemptions (CEQA Guidelines §15300.2(a-f)). If a project meets all of the requirements to qualify for the AB130 CEQA Exemption set forth in PRC §21080.66, then it is deemed statutorily not to have any CEQA impacts, and it is irrelevant if there are any potential environmental impacts, including those identified in the above exceptions. Specifically, there are no exceptions for cumulative project impacts, such as from traffic caused by the approved Sportsmen's Lodge and Harvard-Westlake projects or potential Sunswept project. The Project has been determined to qualify for the AB130 CEQA exemption, and therefore no additional environmental review or analysis is required.

III. The City Must Comply with the Housing Accountability Act

The State Housing Accountability Act ("**HAA**", Gov'n Code § 65589.5) requires that cities approve housing development projects unless the city can make findings that the project causes a specific adverse impact to public health and safety. When a proposed housing development project complies with applicable, objective general plan, zoning, and subdivision standards and criteria, in effect at the time that the application was deemed complete, a City can only disapprove a project or impose a condition that the project be developed at a lower density, if based on the *preponderance* of evidence in the record: (i) The housing development project would have a specific, adverse impact upon the public health or safety unless the project is disapproved or approved upon the condition that the project be developed at a lower density; and (ii) There is no feasible method to satisfactorily mitigate or avoid the adverse impact, other than the disapproval of the housing development project or the approval of the project upon the condition that it be developed at a lower density. (Gov. 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. Code §65589.5(d)(2)) Therefore, the City can only deny the off-menu incentives and waivers for a Density Bonus Project if it finds a specific adverse impact to public health and safety. A preponderance of the evidence is a higher bar than substantial evidence, and it means that the burden of proof is on the appellant to show the greater weight of evidence proves the finding of specific adverse impact. In addition, the City cannot require any environmental analysis that would not

have been required under the statutory CEQA exemption. If the City fails to approve a housing development project without meeting this high burden, the applicant may bring a claim, and obtain attorney's fees, if the court determines that the City acted in bad faith. See *District Square, LLC v. City of Los Angeles* (Case No. 20STCP00654) and *Cesar Chavez 888, LLC v. City of Los Angeles* (Case No. (24STCP01880)

There is no specific adverse impact to public health and safety caused by the location in a Very High Fire Hazard Severity Zone. The Project is located directly on Ventura Boulevard, a multi-lane Major Highway, and is directly adjacent to a Fire Station. The Project complies with all fire access and fire safety requirements, including two fire lanes within the Property leading to Valley Heart Drive. As shown in detail above, and in the Dudek Fire Code Analysis and SGH Wildfire Management Review, the Project fully complies with the State laws (including PRC §4291 and §51182, PRC §4290, and CBC §7A, WUI building standards, City ordinances, and building and fire code requirements. This constitutes substantial evidence in the record that the Project complies with State and local fire codes. In addition, the City has updated the Safety Element of the General Plan in 2025 to conform to State emergency evacuation laws, and has adopted a Local Hazard Mitigation Plan, approved by the Federal Emergency Management Agency (FEMA). There is substantial evidence in the record that the Project does not cause any specific, adverse impacts to public health or safety.

IV. Conclusion

We respectfully request that the City Planning Commission approve the Project, as designed, and approve the statutory CEQA Exemption under PRC §21080.66.

Sincerely,



Sheri L. Bonstelle

SLB

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