DEPARTMENT OF CITY PLANNING

RECOMMENDATION REPORT

City Planning Commission

Date: June 11, 2026
Time: After 8:30 a.m.
Place: City Hall
John Ferraro Council Chamber, 3rd Floor, Room 340
200 North Spring Street
Los Angeles, CA 90012

This meeting may be available virtually, in a hybrid format. The meeting's telephone number and access code number will be provided no later than 72 hours before the meeting on the meeting agenda published at https://planning.lacity.org/about/commissionsboards-hearings and/or by contacting cpc@lacity.org

Public Hearing: April 14, 2026
Appeal Status: Tentative Tract Map is not further appealable
Expiration Date: June 12, 2026, for Commission case

Case No.:	VTT-84453-1A
CEQA No.:	ENV-2025-5698-SE
Incidental Cases:	None
Related Cases:	CPC-2025-5697-DB-PR-SPPC-MCUP-VHCA
Council No.:	4 - Raman
Plan Area:	Sherman Oaks – Studio City – Toluca Lake – Cahuenga Pass
Specific Plan:	Ventura/Cahuenga Boulevard Corridor
Certified NC:	Studio City
GPLU:	Neighborhood Office Commercial
Specific Plan GPLU	Neighborhood and General Commercial
Zone:	C1.5-1VL-RIO
Applicant:	Brett Torino & Eleda Cohen, Studio City Sports Center, LLC
Applicant Representative:	Rose Fistrovic, Psomas
Appellants:	1-Barry Johnson, Studio City Residents Association 2-Studio City for Safe Development Jamie T. Hall, representative 3-Marianne King

PROJECT LOCATION: **12501 - 12665 West Ventura Boulevard**

PROPOSED PROJECT: The proposed project includes the merger and re-subdivision into two 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 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.

REQUESTED ACTIONS: Appeal of the entire Deputy Advisory Agency's April 15, 2026, Determination which approved:

1. An exemption from Californian Environmental Quality Act pursuant to California Public Resource Code Section 21080.66.

2. Pursuant to Los Angeles Municipal Code (LAMC) Section 17.06 and 17.15 and Section 13B.7.3 of the Chapter 1A of the LAMC, a two-phased Vesting Tentative Tract Map, VTT No. 84453, for merger and re-subdivision of the project site into two (2) main ground lots, three (3) residential airspace lots, five (5) commercial airspace lots, and eight (8) parking airspace lots and a haul route approval for the removal of approximately 521,100 cubicle yards of dirt.

RECOMMENDED ACTIONS:

1. **Determine** that based on the whole of the administrative record, the Project is exempt from California Environmental Quality Act (CEQA) pursuant to Public Resources Code, Section 21080.66.

2. **Deny** the appeal and sustain the Deputy Advisory Agency's Determination of VTT-84453.

VINCENT P. BERTONI, AICP
Director of Planning

Phyllis Nathanson

Phyllis Nathanson, Principal City Planner

JoJo Pewsawang, Senior City Planner

Adrineh Melkonian

Adrineh Melkonian, City Planner
Adrineh.melkonian@lacity.org

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PROJECT ANALYSIS

Appellant Decision Body

The regulations for appealed subdivision approvals are established in LAMC, Chapter 1, Article 7. Pursuant to LAMC, Chapter 1A, Section 14.3, the City Planning Commission (CPC) acts as the initial appellate body for projects that involve a lot area of 65,000 square feet or more, create at least 50 dwelling units, or result in a net increase of 50,000 gross square feet of non-residential floor area. As the subject project exceeds all three thresholds by providing over 50 units and 50,000 square feet of non-residential space on a lot larger than 65,000 square feet, it falls under CPC jurisdiction.

Additionally, while Multiple Approval appeals are typically heard by the Area Planning Commission, under LAMC, Chapter 1A, Section 13A.2.10, the City Planning Commission assumes jurisdiction over all appeals of Director of Planning decisions if any related case approvals require a CPC hearing.

Project Summary

The proposed project includes the merger and re-subdivision of four (4) legal lots broken into a total of eight (8) portions into two ground lots, three residential airspace lots, five commercial airspace lots, and eight parking airspace lots for the construction of a mixed use development (Riverwalk at Studio City) consisting of 814 residential dwelling 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.

Background

The proposed project is located at 12501 - 12665 West Ventura Boulevard in the Sherman Oaks – Studio City – Toluca Lake Cahuenga Pass Community Plan area and the Ventura-Cahuenga Boulevard Corridor Specific Plan (Specific Plan). The site consists of four (4) legal lots consisting of eight (8) portions, Los Angeles County Assessor Parcel Number (APNs 2375-018-008, 2375-018-013, 2375-018-018, 2375-018-019), having a lot area of 261,485 square feet pre-dedication. The Advisory Agency approved the applicant's request for a Tentative Tract Map for the merger and re-subdivision into two ground lots, three residential airspace lots, five commercial airspace lots, and eight parking airspace lots and a Haul Route approval for the removal of approximately 521,000 cubic yards of dirt.

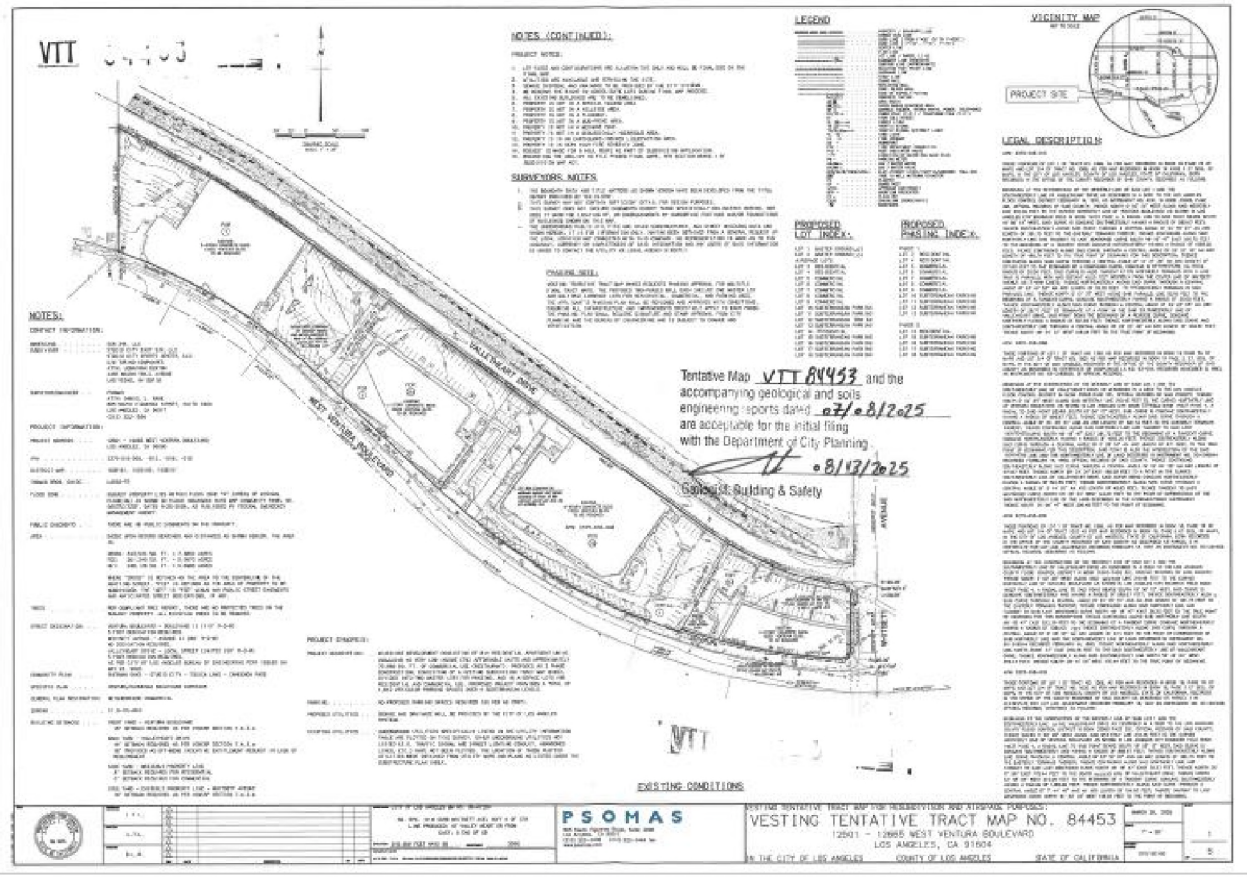


Figure 1. Tentative Tract Map

Below is an aerial photograph with the site shown.

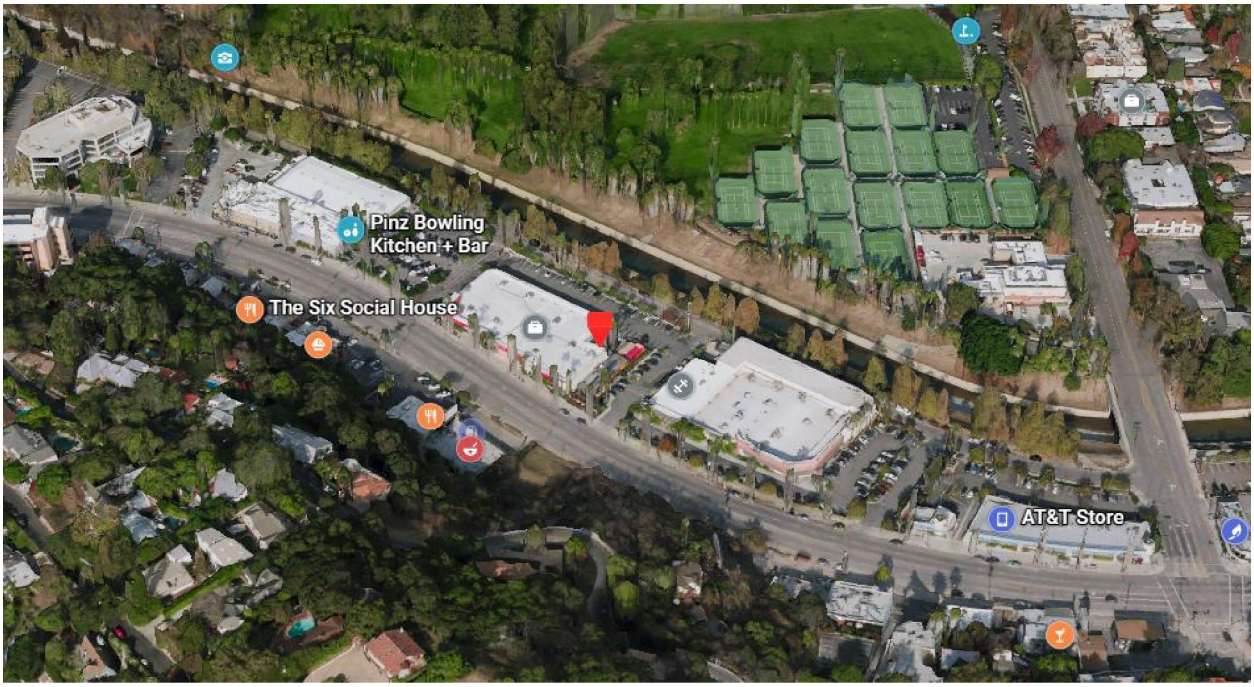


Figure 2. Aerial photography from Bing.com

The Community Plan designates the site for Neighborhood Office Commercial land uses with corresponding zones of C1, C1.5, C2, C4, RAS3, RAS4, and P. The site is zoned C1.5-1VL-RIO (Commercial, Height District 1VL). The C1.5 zone permits a wide array of land uses including commercial and multifamily residential uses. The "1VL" Height District 1VL designation allows a maximum height of 45 feet and three (3) stories, and a maximum floor area ratio ("FAR") of 1.5:1. However, per Section 3.A.2, wherever the Specific Plan contains provisions which require different setbacks, restricted yards, lower densities, lower heights, restricted uses, greater parking requirements or other greater restrictions or limitations on development than would be allowed pursuant to the provisions contained in LAMC Chapters 1 and 1A, the Specific Plan shall prevail and supersede the applicable provisions of the Code. The site is located in the Specific Plan in Neighborhood and General Commercial land use designation which limits the site to an FAR of 1.0:1 and allows buildings, abutting a major or secondary highway, may only exceed 30 feet in height, if, for each 10-foot increment above 25 feet, at least a 10-foot setback from the roof perimeter is provided.

The subdivision case, VTT-84453, was filed on October 10, 2025. On April 15, 2026, the Deputy Advisory Agency issued a Letter of Determination approving the Tentative Tract Map subject to conditions of approval. The CPC-2025-5697-DB-PR-SPPC-MCUP-VHCA, which is a related case, is scheduled for June 11, 2026, City Planning Commission hearing.

Scope of Appeal

On April 28 and 30, 2026, the following appeals of the Deputy Advisory Agency's Determination were filed:

1. **Appellant 1**: Barry Johnson, Studio City Residents Association
2. **Appellant 2:** Studio City for Safe Development, represented by Jamie T. Hall of Channel Law Group, LLP
3. **Appellant 3:** Marianne King

The appeals challenge the entire decision of the Deputy Advisory Agency as well as the project's environmental clearance.

Appeal Points & Staff Response

Appellant 1 Appeal Points:

1. *Appellant claims that the statutory CEQA exemption under PRC § 21080.66 is unavailable because the prcject site is located in a Very High Fire Hazard Severity Zone (VHFHSZ), and the decision letter contains no finding of mitigation. Adding 814 households to a VHFHSZ presents an extreme fire safety and evacuation risk, and emergency responder access to a 7-story structure on congested streets is inadequate.*

   Response:

   The appellant's argument relies on a misinterpretation of the statutory threshold for environmental review. Under Assembly Bill (AB) 130, housing development projects situated within a VHFHSZ remain eligible for the infill housing statutory exemption from CEQA under California Public Resources Code (PRC) Section 21080.66. This eligibility is maintained provided the project implements mitigation measures consistent with rigorous state standards, such as Government Code Section 51182 or California Building Code (CBC) Chapter 7A.

Expert evidence in the record, specifically the Dudek[1] Fire Protection Technical Memo, dated September 26, 2025, confirms that the project "will be in compliance with the applicable provisions of Chapter 7A... and Section 51182," thereby legally qualifying for the exemption.

Accordingly, the project was correctly identified as statutorily exempt under PRC Section 21080.66. Unlike categorical exemptions, statutory exemptions are enacted by the legislature and are generally absolute, meaning they are not subject to "cumulative impact" exceptions that the appellant attempt to trigger. The Dudek Technical Memo further substantiates this by demonstrating that the project adheres to rigorous Los Angeles City Fire Code standards for water supply, fire apparatus access, and defensible space. Key technical details supporting this finding include:

- Aerial fire apparatus access is provided via Ventura Blvd, exceeding the 28-foot minimum width requirement and satisfying all necessary setbacks as required by the Los Angeles Fire Code.
- The Los Angeles Department of Water and Power (LADWP) has verified through an Information of Fire Flow Availability report that the existing infrastructure, utilizing six project-adjacent hydrants flowing simultaneously, can provide the maximum fire flow requirement of 9,000 gallons per minute (gpm).
- The project satisfies defensible space requirements by providing 200 feet of managed vegetative fuel, divided into specific zones (Ember-resistant, Zone A, and Zone B) to minimize structure vulnerability to wildfire.

Furthermore, the lead agency has fulfilled all procedural requirements of AB 130, including the mandatory tribal consultation process. The City notified culturally affiliated tribes, such as the Gabrieleo Band of Mission Indians Kizh Nation, and successfully closed consultation on April 13, 2026, after agreeing to incorporate their specific mitigation measures as binding conditions of approval. By strictly adhering to these infrastructure, fire safety, and procedural standards, the project successfully meets all statutory requirements for exemption eligibility.

2. *Appellant claims the 200-day haul route authorizing 28,800 truck trips will cause traffic gridlock at already failing intersections, and no traffic impact analysis (TIA) or Level of Service (LOS) study was conducted.*

Response:

The project qualifies for a Statutory Exemption from CEQA pursuant to Public Resources Code (PRC) Section 21080.66, as established under Assembly Bill 130. Consequently, the appellant's demand for a TIA and LOS study is I not required pursuant to CEQA, because a statutory exemption does not require project specific traffic-related analyses. While the appellant expresses concerns regarding cumulative traffic and quality-of-life impacts, statutory exemptions—unlike categorical exemptions—are legislative mandates that do not include exceptions for cumulative impacts.

To maintain public safety and ensure organized traffic flow, the Advisory Agency exercised its independent authority under the Subdivision Map Act (SMA) to impose rigorous operational conditions on the haul route. These comprehensive measures which are grounded in site-specific infrastructure capabilities, include limiting haul route activity to 144 daily truck trips, restricting operational hours to between 9:00 a.m. and 3:00 p.m., and requiring the continuous

[1] Dudek was commissioned by Genton Cockrum Partners to provide a due diligence technical assessment of the Riverwalk at Studio City project (Project).

presence of flag persons to manage circulation. The use of the PRC Section 21080.66 exemption is further validated by a fire protection technical analysis confirming the project adopts all state-mandated fire hazard mitigation standards required for infill housing in a Very High Fire Hazard Severity Zone. To further the administrative records, the staff recommends adding the following condition of approval:

Prior to the recordation of the Final Map, 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.

3. *Appellant claims the proposed 84-foot, 7-story height exceeds the maximum allowed under State Density Bonus Law, and the Advisory Agency improperly deferred density and zoning compliance to Los Angeles Department of Building and Safety (LADBS).*

Response:

The Vesting Tentative Tract Map (VTT-84453) serves primarily to facilitate the merger and re-subdivision of the project site into ground and airspace lots. It does not, however, independently authorize deviations from established density or height standards. The Advisory Agency has lawfully conditioned the map's ultimate effectuation upon the successful approval and implementation of the related case CPC case (CPC-2025-5697-DB-PR-SPPC-MCUP-VHCA). This companion case is the designated legal vehicle for adjudicating Density Bonus requests, Specific Plan compliance, and other building-specific entitlements.

Per the Letter of Determination (LOD) and associated Staff Report, the physical building envelope, height, and unit density are strictly governed by the companion CPC case. While the subdivision map is consistent with the unit density permitted by the underlying C1.5-1VL-RIO zone, any density bonus or height waivers are subject to the adjudication of the CPC case. Condition 18.g of the LOD explicitly mandates that prior to the recordation of the final map, the applicant must submit an approved copy of the CPC case and demonstrate full compliance with all its associated conditions. If the companion CPC case is not approved or is significantly altered, a formal modification to the tract map will be required.

Furthermore, the Subdivision Map Act limits the scope of "design and improvement" to the configuration of lots and the infrastructure serving them, such as street alignments and utilities, rather than the vertical construction or building scale. Consequently, the Advisory Agency's findings focus on required public right-of-way improvements, such as the dedication of land to widen Valleyheart Drive and the installation of new street lighting and sidewalks as recommended by the Bureau of Engineering and Bureau of Street Lighting. These mandated infrastructure upgrades are independent of the building's physical attributes, which remain under the jurisdiction of the companion CPC case.

4. *Appellant claims the prcject will cause severe cumulative quality-of-life impacts (noise, air quality, parking displacement) due to concurrent demolition and construction with the nearby Residences at Sportsmen's Lodge.*

Response:

Pursuant to legislative mandate, projects that satisfy the PRC 21080.66 criteria are granted a statutory exemption from CEQA. Unlike categorical exemptions, which are subject to exceptions such as those for "cumulative impacts" under CEQA Guidelines Section 15300.2,

statutory exemptions are enacted by the State Legislature and are generally absolute. Therefore, assertions concerning cumulative construction effects, such as noise, air quality, or traffic from concurrent nearby developments, do not undermine the project's exempt status. Furthermore, the Advisory Agency has formally determined that the subdivision's design is unlikely to result in significant public health or environmental issues under the Subdivision Map Act, provided there is adherence to standard City regulations and specific conditions of approval. These findings are grounded in site-specific infrastructure capabilities and are independent of the project's statutory CEQA clearance.

5. *Appellant claims the excavation of 521,000 cubic yards in a liquefaction zone requires substantive CEQA analysis. Deferring the geotechnical analysis to an unpublished LADBS report violates CEQA and the Map Act's substantive finding requirements.*

Response:

While CEQA review is precluded by the Statutory Exemption established by AB 130, the project's physical suitability and safety are confirmed by the LADBS Grading Division's Soils Report Approval Letter (Log #136328). Structural integrity is ensured through mandated engineering measures, including the use of a mat foundation deriving support from competent native soils to mitigate earthquake-induced settlements. The LADBS approval specifically requires that the structure and its subterranean walls be designed to withstand uplift and hydrostatic pressures based on historic high groundwater levels, with all retaining walls provided with standard surface back drain and subdrain systems.

Rigid environmental and safety protocols are also established by the approval. Any necessary dewatering must obtain formal clearance from the Department of Public Works and the California Regional Water Quality Control Board (LARWQB) before permits are issued. Regarding site stability, the LADBS Grading Division has prohibited on-site storm water infiltration systems due to the site's location in a liquefaction zone. Consequently, the project must implement alternative Low Impact Development (LID) strategies, such as biofiltration or capture and use, to satisfy RIO and stormwater regulations.

Finally, the approval mandates strict controls for excavation and lateral support to protect adjacent properties and public ways. Pursuant to the soil report approval letter, LOG # 136328, shoring is required for any temporary excavations that remove lateral support, defined as excavations extending below a 45-degree plane from the bottom of an existing footing or property line. These systems must be engineered for a maximum lateral deflection of ½ inch if nearby structures are within a 1:1 plane. A comprehensive shoring monitoring program must be maintained throughout this process to the satisfaction of the soils engineer. Furthermore, the owner must provide a 30-day written notice of intent to neighbors before excavating deeper than adjoining foundations.

6. *Appellant claims the Subdivision Map Act requires independent environmental review separate from the CEQA exemption. The AB 130 CEQA exemption does not excuse the City from making independent environmental and public health findings under the Subdivision Map Act.*

Response:

The Advisory Agency made detailed and specific findings in accordance with the Subdivision Map Act (Gov. Code § 66474) that exist independently of any CEQA exemption. As documented in the determination letter, the subdivision's design and proposed improvements

were evaluated to ensure they would not result in significant environmental damage or cause serious public health problems.

The Advisory Agency affirmative findings regarding public health and safety were predicated on comprehensive evaluations conducted by technical departments. The Bureau of Engineering (BOE) analyzed the site's infrastructure and confirmed reliable connectivity to the existing public sewer system. To improve pedestrian safety and accessibility, the BOE further mandated extensive ADA-compliant sidewalk improvements along major thoroughfares, including Ventura Boulevard, Whitsett Avenue, and Valleyheart Drive. Additionally, the Bureau of Street Lighting (BSL) dictated specific safety enhancements, including the installation of 10 new streetlights on Valleyheart Drive and 13 upgrades to existing lighting on Ventura Boulevard and Whitsett Avenue to meet modern public safety standards.

A critical component of the Advisory Agency's rationale was the intentional distinction maintained between the CEQA process and the requirements of the Subdivision Map Act. The Advisory Agency's determination offers findings under Gov. Code § 66474(e) and (f), which determine that the site is physically suitable for the proposed density and type of development. These conclusions were based on the site's existing urbanized character and confirmed links to regional infrastructure, such as the Hyperion Treatment Plant, and were arrived at through an analysis entirely separate from the CEQA exemption.

Appellant 2 Appeal Points:

7. *Appellant claims inconsistency with the General Plan Safety Element due to wildfire evacuation constraints in a VHFHSZ.*

Response:

The determination letter provides explicit acknowledgement of the VHFHSZ status, with Finding (a) verifying that the proposed map maintains long-term consistency with the objectives and policies of both the Community Plan and the Citywide General Plan. The City of Los Angeles General Plan Safety Element provides a contextual framework for understanding the relationship between hazard mitigation, disaster response, and recovery. It explicitly incorporates the City's Local Hazard Mitigation Plan (LHMP), which establishes a framework for risk-based decision-making to reduce damage from future disasters—including wildfires—and guides the implementation of stringent building and fire codes.

Mandatory compliance with all pertinent Fire Department regulations is an absolute requirement for the project, ensuring that development within this sensitive zone adheres to the highest safety protocols. By conforming to these protocols, the project directly implements the hazard mitigation and emergency preparedness objectives outlined in both the Safety Element and the Local Hazard Mitigation Plan. As the primary jurisdictional expert in fire life safety, the Los Angeles Fire Department (LAFD) conducted an exhaustive review of the specific Vesting Tentative Tract Map (VTT-84453) and formally confirmed that the site plan and emergency access parameters incorporate sufficient safety components to protect future residents and the surrounding community.

Rather than rejecting the map or identifying insurmountable safety flaws, LAFD recommended its approval, contingent upon the developer meeting rigorous urban fire safety standards. These critical requirements include formal plot plan approval to verify hydrant placement and turnout dimensions, the mandatory installation of Knox Boxes to facilitate rapid emergency entry, and strict adherence to aerial access parameters for any buildings exceeding 30 feet in

height to ensure ladder truck functionality during a fire event. As the project satisfies these stringent LAFD conditions, it is fully consistent with the General Plan Safety Element's mandate to protect residents from unreasonable risks associated with natural disasters.

8. *Appellant claims the prcject will ir.jure wildlife (Western Yellow Bat) and that "no habitat" findings lack evidence.*

Response:

According to Subdivision Map Act Finding (e), the project site is presently occupied by surface parking and commercial structures. There was no evidence of established habitat, fish, or wildlife found on the property. Consequently, it has been determined that the design of the subdivision and proposed improvements will not cause substantial environmental damage or injury to wildlife or their habitat. Additionally, while there are no Protected Trees on site, the project is mandated to provide tree replacement at a 1:1 ratio for the non-protected trees and trees within the public right-of-way proposed for removal.

9. *Appellant claims the prcject violates State Minimum Fire Safe Regulations (14 CCR § 1276.01) by providing 1.5-foot setbacks instead of the mandated 30-foot setbacks, creating a serious public health hazard. Appellant claims the introduction of substantial new population to a VHFHSZ without compliance with the State Minimum Fire Safe Regulations exacerbates wildfire hazards and constitutes a serious public health problem. Appellant claims the AB 130 CEQA statutory exemption (PRC § 21080.66) is invalid because the prcject allegedly fails to comply with State Minimum Fire Safe Regulations.*

Response:

The administrative record includes a Fire Protection Technical Memo prepared by Dudek that offers a due diligence assessment for the project. The Dudek memo, dated September 26, 2025, explicitly states the project complies with PRC § 4290 and § 4291. While 14 CCR § 1276.01(a) requires a 30-foot setback, subsection (b)(5) allows reductions if the project incorporates the most protective requirements of CBC Chapter 7A. The appellant's claim selectively reads State Fire Safe Regulations. While 14 CCR § 1276.01 requires setbacks, it expressly permits reductions when a project utilizes alternative methods, such as complying with California Building Code Chapter 7A. The project's Fire Protection Technical Memo states that the project would comply, mitigating structure-to-structure ignition risks. Ultimately, during the plan check process, the project will be reviewed for compliance from LAFD and LADBS.

10. *Appellant claims the prcject introduces a public health problem because there is no corridor-level evacuation capacity analysis for Ventura Boulevard, which already serves as a primary wildfire evacuation route.*

Response:

The appellant's assertions concerning evacuation capacity are based on anecdotal lay opinions and lack the substantial evidence required under CEQA Guidelines. Neither the Subdivision Map Act nor the applicable CEQA Statutory Exemption requires a corridor-level mass evacuation simulation for an infill project. The project was reviewed by numerous City agencies, including LADOT and LAFD, both of which imposed specific conditions for access, fire lanes, and reservoir space to ensure life safety and emergency apparatus access.

To facilitate safe movement and prevent queuing in the public right-of-way, LADOT mandated a 30-foot-wide two-way driveway and a 20-foot queuing reservoir space within the project site. Furthermore, LAFD established independent requirements, including 28-foot widths for aerial apparatus access and a maximum travel distance of 150 feet from property line to ensure that firefighters can extend pre-connected hose lines completely around buildings. According to the Dudek Fire Protection Technical Memo, dated September 26, 2025, Ventura Boulevard measures 70 feet in width, which significantly exceeds the LAFD's 28-foot minimum requirement for aerial fire apparatus access roads. The project's urban infill setting and approved 70-foot-wide aerial access route provides compliant fire protection features, with buildings set back approximately 21 feet from Ventura Blvd, safely falling within the required 15- to 30- foot range for aerial ladder articulation. Additionally, other local access roads, such as Whitsett Avenue and Valleyheart Drive, meet the required widths for emergency apparatus, with widths of 64 feet and 28 feet respectively. Because neither expert agency identified systemic evacuation failures or unmitigated specific adverse impacts on public health and safety, the Advisory Agency's determination incorporates these rigorous LAFD and LADOT conditions, including 20- to 28-foot fire lanes and proximity mandates for hydrants, to guarantee secure ingress and egress.

11. *Appellant claims the City failed to consider cumulative impacts of ongoing nearby prcjects on evacuation and health.*

Response:

The project was granted a Statutory Exemption under PRC § 21080.66. Unlike Categorical Exemptions, which are regulatory in nature and established by the Secretary of the Resources Agency, Statutory Exemptions are enacted directly by the legislature and are generally absolute in their application. Because they are created by statute, they are not subject to the "cumulative impact" or other exceptions found in the CEQA Guidelines that typically limit the use of categorical exemptions. This specific exemption under PRC § 21080.66 provides a streamlined pathway for certain projects by removing the requirement for further environmental review under CEQA.

Appellant 3 Appeal Points:

12. *Appellant opposes the 10-foot-wide concrete sidewalk on Valleyheart Drive, requesting a combination sidewalk and grass parkway to increase permeability and ecological balance next to the LA River.*

Response:

LAMC, Chapter 1, Section 17.05 D requires that subdivisions conform to adopted Street Design Standards. BOE explicitly required the 5-foot dedication and the construction of a 10-foot-wide concrete sidewalk with tree wells along Valleyheart Drive to complete a Limited Local Street standard border. This requirement is incorporated as LOD Condition S-3(i)(3). The inclusion of tree wells provides necessary permeability. The mandated 10-foot-wide concrete sidewalk with tree wells strictly adheres to the Bureau of Engineering's street improvement standards and ADA requirements for a Limited Local Street. These mandated tree wells ensure permeability while maintaining safe and compliant pedestrian access within the public right-of-way.

13. *Appellant asserts that installing 10 street lights on Valleyheart Drive is excessive and will cause adverse light pollution impacts on nocturnal wildlife in the LA River open space.*

Response:

The requirement for street lighting along Valleyheart Drive is a public improvement mandated by the Bureau of Street Lighting (BSL) to ensure public safety and adequate roadway illumination for both vehicular and pedestrian traffic. In accordance with LAMC, Chapter 1, Section 17.05, which requires adequate public improvements for all subdivisions, the BSL initially determined that ten (10) new street lights, as specified in LOD Condition S-3(c)(1), are necessary along Valleyheart Drive.

The BSL has noted that this initial quantity is a preliminary determination; the final number and precise placement of these fixtures may be modified during the formal plan check phase. These adjustments will be based on technical illumination calculations and equipment selection to meet current minimum national standards for safety. Furthermore, the project includes additional lighting improvements, such as the relocation and upgrade of one (1) street light on Whitsett Avenue and twelve (12) street lights on Ventura Boulevard if street widening occurs pursuant to Bureau of Engineering conditions.

While the appellant claims that 10 street lights are excessive and will impact nocturnal wildlife, they have not submitted substantive evidence demonstrating that these requirements violate any LAMC standards. Further, as noted on Page 3 of the LOD, the site is subject to the River Implementation Overlay (LA RIO). Pursuant to LAMC Sec. 13.17, the project must obtain RIO Administrative Clearance, which strictly requires exterior lighting to be shielded, down-cast, and designed to prevent glare and light spillover into the adjacent Los Angeles River habitat (LAMC Section 13.17-F,3). Thus, the project lawfully balances mandatory public safety illumination with objective ecological protections

14. *Appellant objects to the 1.5-foot rear yard setback along Valleyheart Drive, citing concerns over the project's excessive massing. Furthermore, the Appellant argues that the area regained from the cancelled Ventura Boulevard dedication should instead be redirected toward Valleyheart Drive.*

Response:

To comply with LOD Condition CC-1, the project must replace trees at a 1:1 ratio using minimum 24-inch box trees. The project proposal involves the removal of non-protected trees to accommodate new development, which necessitates a robust replacement strategy to maintain the local canopy. However, because the site is located within a VHFHSZ, landscaping must strictly adhere to LAFD fuel modification standards as outlined in LAMC, Chapter 5, Article 7. According to the Dudek Fire Protection Technical Memo, fire safety takes precedence in this zone; properties must prioritize fire-resistant plant selection and restrict any species that could create a fuel ladder hazard, such as those that facilitate the vertical and horizontal continuity of fire, regardless of standard native species quotas.

The landscape plan is required to balance the environmental mandates of LOD Condition CC-1 with mandatory fire safety regulations. This includes maintaining defensible space, such as a 5-foot ember-resistant "Zone 0" around structures and a "lean" Zone A extending 30 feet, where plant density is restricted and species are limited to small herbaceous or succulent varieties. While artificial turf may be utilized as a fire lane surface to ensure necessary aerial

apparatus access, it remains subject to explicit LAFD approval. Ultimately, the selection of flora must prioritize moisture-retaining, low-resin species that do not produce excessive dead litter, ensuring that the project upholds public safety while fulfilling its 203-tree replacement requirement to comply with the RIO approved plant palette.

15. *Appellant opposes the 1.5-foot rear yard setback on Valleyheart Drive, claiming the prcject is too massive and that space from a dropped Ventura Boulevard dedication should be shifted to Valleyheart Drive.*

Response:

The Vesting Tentative Tract (VTT-84453) is solely a subdivision action under the Subdivision Map Act, used to create ground lots and airspace lots. Setbacks, building massing, and site design are land-use and zoning regulations. The LOD explicitly states that front and side yard requirements must comply with the Specific Plan, the LAMC, and the companion case (CPC-2025-5697-DB-PR-SPPC-MCUP-VHCA), and are verified by the Department of Building and Safety.

Setbacks for the Riverwalk at Studio City project are governed by the Ventura-Cahuenga Boulevard Corridor Specific Plan and the associated Density Bonus entitlements. The project site is considered a through lot. Pursuant to LAMC, Chapter 1, Section 12.21.C.1.h, "at each end of a through lot there shall be a front yard of the depth required for the zone in which each street frontage is located, ..." Since Ventura Boulevard is considered the front, the project is required to have a rear yard setback of 15 feet. As part of the Density Bonus application, which reserves 7% (46 units) of the base density for Very Low Income tenants, the applicant is requesting a Waiver of Development Standard to allow for a 1.5-foot rear yard setback. This is in lieu of the 19-foot setback otherwise required by Specific Plan and LAMC Section 12.13.C.3, as the project's seven-story height normally necessitates additional yard depth. The 1.5-foot setback is measured from the lot line adjacent to Valleyheart Drive. The requested waiver allows the developer to expand the building envelope so additional units can be constructed, and the overall space (dedicated to residential uses) is increased. This waiver supports the Applicant's decision to provide affordable units for Very Low Income Households for 55 years.

Furthermore, the project design has been revised to incorporate more extensive landscaping and the planting of additional trees along the Ventura Boulevard frontage. These enhancements are specifically situated within the area previously designated for dedication and are intended to foster a dynamic, pedestrian-friendly streetscape that improves the native habitat. The proposed development fully complies with the RIO Ordinance, ensuring a positive interface with the adjacent Los Angeles River through multimodal connections and native species support. These modifications, alongside requested waivers for height and lot coverage, are essential to achieving the project's total density of 814 residential units.

16. *Appellant claims the 84-foot, 7-story building will cast shadows that adversely impact the LA River habitat area.*

Response:

The appellant's shade and shadow concerns target the physical building envelope and height, which are entirely outside the scope of this Vesting Tentative Tract Map action and are instead governed by the companion CPC entitlement. Furthermore, the environmental grievance is statutorily invalid; as an infill mixed-use project located within a Transit Priority Area (TPA),

shade and shadow impacts are expressly precluded from being considered significant environmental impacts pursuant to Public Resources Code § 21099(d)(1). Opinions regarding shading do not override these explicit state law exemptions.

Conclusion

Based on the analysis provided, staff has determined that the project satisfies all Subdivision standards and complies with all applicable CEQA requirements. The project, known as Riverwalk at Studio City, proposes to repurpose 6.01 acres (261,870 square feet) for a mixed-use development featuring 814 residential units and 75,968 square feet of commercial space. As the residential floor area constitutes approximately 89.6% of the total 726,822 square feet, the project qualifies as a housing development project eligible for statutory relief.

Staff recommends that the City Planning Commission (CPC) deny the appeal regarding the Deputy Advisory Agency's Determination issued on April 28, 2026, and April 30, 2026. Furthermore, acting upon independent judgment, after reviewing the entire administrative record, it is recommended that the CPC found that the project was appropriately assessed under Statutory Exemption No. ENV-2025-5698-SE on April 15, 2026. This determination is supported by the project's adherence to the Assembly Bill (AB) 130, effective June 30, 2025, CEQA Statutory Infill Exemption standards, including its location within an incorporated municipality and its previous development with urban land uses. Based on the complete record, the project remains exempt from CEQA in accordance with Public Resources Code Section 21080.66.

APPLICATIONS

APPEAL APPLICATION
Instructions and Checklist

THIS SECTION FOR CITY PLANNING STAFF USE ONLY

Base Fee: _____

Reviewed & Accepted by (DSC Planner): _____

Receipt No.: _____ **Date:** _____

☐ Determination authority notified ☐ Receipt Number: _____

PURPOSE

This application is for the appeal of Los Angeles Department of City Planning determinations, as authorized by the LAMC. For California Environmental Quality Act Appeals use form CP13-7840. For Building and Safety Appeals and Housing Department Appeals, use form CP13-7854.

RELATED CODE SECTION

Refer to the Letter of Determination (LOD) for the subject case to identify the applicable Los Angeles Municipal Code (LAMC) Section for the entitlement and the appeal procedures.

APPELLATE BODY

Check only one. If unsure of the Appellate Body, check with City Planning staff before submission.

☐ Area Planning Commission (APC) ☑ City Planning Commission (CPC) ☐ City Council

☐ Zoning Administrator (ZA)

CASE INFORMATION

Case Number: VTT-84453

APN: _____

Project Address: 12501 - 12665 West Ventura Boulevard

Final Date to Appeal: April 30, 2026

JUSTIFICATION / REASON FOR APPEAL

Is the decision being appealed in its entirety or in part? ☑ **Entire** ☐ **Part**

Are specific Conditions of Approval being appealed? ☑ YES ☐ NO

If Yes, list the Condition Number(s) here: FINDINGS OF FACT (SUBDIVISION MAP ACT) - (a), (b), (c), (d), (e), (f) (g), (h)

On a separate sheet provide the following:

- ☑ Reason(s) for the appeal
- ☑ Specific points at issue
- ☑ How you are aggrieved by the decision

APPELLANT

Check all that apply.

☑ Person, other than the Applicant, Owner or Operator claiming to be aggrieved

☐ Representative ☐ Property Owner ☐ Applicant ☐ Operator of the Use/Site

APPELLANT INFORMATION

Appellant Name: Board of the Studio City Residents Association

Company/Organization: Studio City Residents Association (organization)

Mailing Address: P.O. Box 1374

City: Studio City **State:** CA **Zip Code:** 91604

Telephone: 818-509-0230 **E-mail:** scraboard@studiocityresidents.org

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

☐ Self ☑ Other: Studio City Residents Association (organization)

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

REPRESENTATIVE / AGENT INFORMATION

Name: Barry Johnson

Company/Organization: Studio City Residents Association

Mailing Address: P.O. Box 1374

City: Studio City **State:** CA **Zip Code:** 91604

Telephone: 818-270-3281 **E-mail:** bjohnson4166@sbcglobal.net

APPLICANT'S AFFIDAVIT

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

Appellant Signature: Barry Johnson **Date:** 4/28/26

GENERAL NOTES

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

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

GENERAL APPEAL FILING REQUIREMENTS

An appeal application must be submitted and paid for before 4:30 PM (PST) on the final day to appeal the determination. Should the final day fall on a weekend or legal City holiday, the time for filing an appeal shall be extended to 4:30 PM (PST) on the next succeeding working day. Appeals should be filed early to ensure the Development Services Center (DSC) staff has adequate time to review and accept the documents, and to allow appellants time to submit payment. Appeals may be filed either online or in person as referenced below.

ONLINE APPEAL FILINGS THROUGH ONLINE APPLICATION SYSTEM (OAS)

Online Application System (OAS): The OAS (https://planning.lacity.gov/oas) allows entitlement appeals to be submitted entirely electronically by allowing an appellant to fill out and submit an appeal application online directly to City Planning's DSC, and submit fee payment by credit card or e-check.	QR Code to Online Appeal Filing

IN PERSON APPEAL FILINGS

Drop off at DSC: Appeals of this determination can be submitted in-person at the Metro or Van Nuys DSC locations, as well as the South Los Angeles DSC on Tuesdays and Thursdays, and payment can be made by credit card or check.

a. City Planning has established drop-off areas at the DSCs with physical boxes where appellants can drop off appeal applications.

b. Alternatively, appeal applications can be filed with staff at DSC public counters. Appeal applications must be on the prescribed forms, and accompanied by the required fee and a copy of the determination letter. Appeal applications shall be received by the DSC public counter and paid for on or before the above date or the appeal will not be accepted.

CITY PLANNING DEVELOPMENT SERVICES CENTERS – PUBLIC COUNTERS

Office	Address	Phone Number	Email
Metro DSC	201 N. Figueroa Street 4th Floor Los Angeles, CA 90012	(213) 482-7077	planning.figcounter@lacity.org
Van Nuys DSC	6262 Van Nuys Boulevard, Suite 251 Van Nuys, CA 91401	(818) 374-5050	planning.mbc2@lacity.org
South LA DSC *Tuesday and Thursday Only*	8475 S. Vermont Avenue, 1st Floor Los Angeles, CA 90044	(213) 978-1465	planning.southla@lacity.org

City Planning staff may follow up with the appellant via email and/or phone if there are any questions or missing materials in the appeal submission, to ensure that the appeal package is complete and meets the applicable LAMC provisions.

If you seek judicial review of any decision of the City pursuant to California Code of Civil procedure Section 1094.5, the petition for writ of mandate pursuant to that section must be filed no later than the 90th day following the date on which the City's decision became final pursuant to California Code of Civil Procedure Section 1094.6. There may be other time limits which also affect your ability to seek judicial review.

APPEAL DOCUMENTS

1. Hard Copy

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

- ☑ Appeal Application
- ☑ Justification/Reason for Appeal
- ☑ Copy of Letter of Determination (LOD) for the decision being appealed

2. Electronic Copy

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

3. Appeal Fee

- ☐ *Original Applicant.* The fee charged shall be in accordance with LAMC Section 19.01 B.1(a) of Chapter 1 or LAMC Section 15.1.1.F.1.a. (Appeal Fees) of Chapter 1A as applicable, or a fee

equal to 85% of the original base application fee. Provide a copy of the original application receipt(s) to calculate the fee.

☑ *Aggrieved Party. The fee charged shall be in accordance with LAMC Section 19.01 B.1(b) of Chapter 1 or LAMC Section 15.1.1.F.1.b. (Appeal Fees) of Chapter 1A as applicable.*

4. Noticing Requirements (Applicant Appeals Only)

☐ *Copy of Mailing Labels.* All appeals require noticing of the appeal hearing per the applicable LAMC Section(s). Original Applicants must provide noticing per the LAMC for all Applicant appeals. See the Mailing Procedures Instructions (CP13-2074) for applicable requirements.

SPECIFIC CASE TYPES
ADDITIONAL APPEAL FILING REQUIREMENTS AND / OR LIMITATIONS

DENSITY BONUS (DB) / TRANSIT ORIENTED COMMUNITES (TOC)

Appeal procedures for DB/TOC cases are pursuant to LAMC Section 13B.2.5. (Director Determination) of Chapter 1A or LAMC Section 13B.2.3. (Class 3 Conditional Use) of Chapter 1A as applicable.

- Off-Menu Incentives or Waiver of Development Standards are not appealable.
- Appeals of On-Menu Density Bonus or Additional Incentives for TOC cases can only be filed by adjacent owners or tenants and is appealable to the City Planning Commission.
    - ☐ Provide documentation confirming adjacent owner or tenant status is required (e.g., a lease agreement, rent receipt, utility bill, property tax bill, ZIMAS, driver's license, bill statement).

WAIVER OF DEDICATION AND / OR IMPROVEMENT

Procedures for appeals of Waiver of Dedication and/or Improvements (WDIs) are pursuant to LAMC Section 12.37 I of Chapter 1 or LAMC Section 10.1.10. (Waiver and Appeals) of Chapter 1A as applicable.

- WDIs for by-right projects can only be appealed by the Property Owner.
- If the WDI is part of a larger discretionary project, the applicant may appeal pursuant to the procedures which govern the main entitlement.

[VESTING] TENTATIVE TRACT MAP

Procedures for appeals of [Vesting] Tentative Tract Maps are pursuant LAMC Section 13B.7.3.G. of Chapter 1A.

- Appeals must be filed within 10 days of the date of the written determination of the decision-maker.

NUISANCE ABATEMENT / REVOCATIONS

Appeal procedures for Nuisance Abatement/Revocations are pursuant to LAMC Section 13B.6.2.G. of Chapter 1A. Nuisance Abatement/Revocations cases are only appealable to the City Council.

Appeal Fee

- ☐ *Applicant (Owner/Operator).* The fee charged shall be in accordance with the LAMC Section 19.01 B.1(a) of Chapter 1 or LAMC Section 15.1.1.F.1.a. (Appeal Fees) of Chapter 1A as applicable.

  For appeals filed by the property owner and/or business owner/operator, or any individuals/agents/representatives/associates affiliated with the property and business, who files the appeal on behalf of the property owner and/or business owner/operator, appeal application fees listed under LAMC Section 19.01 B.1(a) of Chapter 1 shall be paid, at the time the appeal application is submitted, or the appeal application will not be accepted.

- ☑ *Aggrieved Party.* The fee charged shall be in accordance with the LAMC Section 19.01 B.1(b) of Chapter 1 or LAMC Section 15.1.1.F.1.b. (Appeal Fees) of Chapter 1A as applicable.

SPECIFIC POINTS AT ISSUE

The Traffic Disaster Case

Haul-Route Impacts of The Riverwalk at Studio City / VTT-84453

April 21, 2026

Case No.: VTT-84453 **Companion Case No.:** CPC-2025-5697-DB-PR-SPPC-MCUP-VHCA
Site: 12501-12665 W. Ventura Boulevard, Studio City **Decision Date:** April 15, 2026 ·
Appeal Deadline: April 30, 2026, 4:30 PM PST

The Headline

521,000 cubic yards of dirt. 28,800 heavy-truck trips. 200 days. Through intersections already operating at a failing Level of Service. With a haul-route authorization that allows trucks to drive three miles west on Ventura Boulevard before turning north — on purpose or by drafting oversight. And with no environmental review, no traffic impact analysis, and no Level of Service study in the record. This is not a construction project with traffic impacts; it is a 200-day traffic event being treated as an administrative footnote.

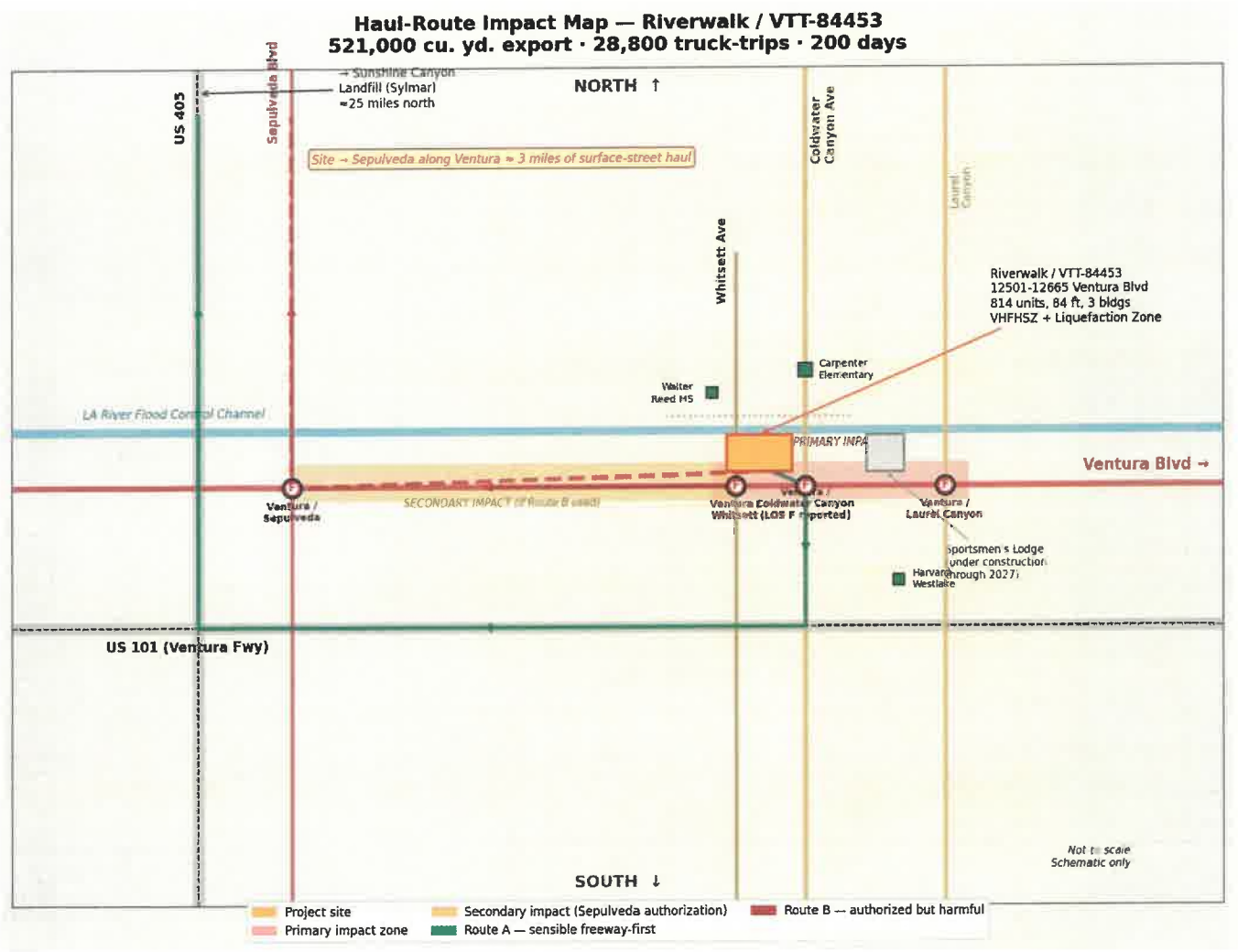


Figure 1: Haul-route impact map showing the project site, the two possible routes to the Sunshine Canyon Landfill, affected intersections, schools, and impact zones.

1. The Scope of the Traffic Event

The Advisory Agency's April 15, 2026 decision letter authorizes the export of approximately **521,000 cubic yards of soil** to enable construction of four subterranean parking levels. The haul-route conditions (Condition 18.h.a–v) authorize **144 truck-trips per day for 200 days**, during a 9:00 AM to 3:00 PM operating window, Monday through Saturday.

The numbers, translated

Metric	Value
Soil export volume	521,000 cubic yards
Truck capacity (typical 18-wheel dump)	~18 cubic yards/load
Total truckloads required	~29,000 loads
Authorized truck-trips per day	144
Authorized operating days	200
Total authorized trips	28,800
Operating window (hours/day)	6 hours (9 AM - 3 PM)
Trips per hour during window	24
Trips per minute during window	**Roughly one truck every 2.5 minutes**
Duration (calendar months)	≈10 months of weekday+Saturday operations

For context: at 24 trips per hour, the haul-route streets see a heavy-truck passage every 150 seconds during the entire six-hour authorized window, for 200 days. That is equivalent to the truck volume of a small industrial port running simultaneously through the commercial heart of a residential neighborhood.

2. The Authorized Streets

The decision letter authorizes truck operations on the following streets (Condition 18.h.a):

- **Ventura Boulevard** (origin; commercial arterial through Studio City and Sherman Oaks)
- **Coldwater Canyon Avenue** (local north-south; freeway access)
- **US 101** (Ventura Freeway)
- **US 405** (San Diego Freeway)
- **US 5** (Golden State Freeway)
- **Roxford Street** (Sylmar; landfill access)
- **Sepulveda Boulevard** (Valley-wide north-south surface arterial)
- **San Fernando Road** (North Valley surface arterial)
- **Sunshine Canyon Road** (landfill access)

Two possible routes emerge from this list

Route A — sensible. Site → Coldwater Canyon Avenue → US 101 → US 405 north → US 5 north → Roxford/Sunshine Canyon exits → Sunshine Canyon Landfill. *Surface street usage is minimal and close to the origin.*

Route B — authorized but harmful. Site → approximately 3 miles west on Ventura Boulevard through Studio City and Sherman Oaks → Sepulveda Boulevard → north on Sepulveda

as a surface-street parallel to the 405 freeway → San Fernando Road → Sunshine Canyon Road → landfill. *Route B adds approximately 6 additional miles of surface-street haul (3 miles west on Ventura plus the Sepulveda surface-arterial miles the freeway would otherwise cover) — per trip. At 28,800 trips, Route B adds on the order of 170,000 surface-street truck-miles over the project.*

The decision letter contains **no condition prohibiting Route B**. Sepulveda Boulevard is an authorized haul-route street. The Advisory Agency made no finding, and required no showing, that freeway alternatives would be used when feasible.

3. Geographic Impact — Mapping the Affected Areas

Primary Impact Zone — immediately adjacent to the site

The block of Ventura Boulevard from Whitsett Avenue (15500-block) to Coldwater Canyon Avenue (16800-block) will experience daily heavy-truck traffic during the entire 200-day haul period. This is the most concentrated impact zone.

Businesses and uses directly on the Primary Zone:

- The entire 12500-12800 block of Ventura Boulevard, primarily restaurants, retail, and personal services
- **Carpenter Community Charter Elementary School** (3909 Carpenter Avenue, one block north of site)
- **Walter Reed Middle School** (within walking distance at 4525 Irvine Avenue)
- The Laurel Plaza / Vineland-adjacent retail clusters
- Studio City Farmers Market (Sundays at Ventura/Radford, ~0.5 miles east)

Secondary Impact Zone — Ventura Boulevard west of the site

If Route B is used — and there is nothing in the decision letter to prevent it — the following Ventura Boulevard segments and intersections are subjected to substantial additional haul-route traffic:

- Ventura Blvd from Whitsett west through Laurel Canyon to Colfax/Radford
- Ventura Blvd from Colfax through Fulton/Woodman to Van Nuys Blvd
- Ventura Blvd from Van Nuys through the Sherman Oaks Galleria retail district
- Ventura Blvd through Encino to Sepulveda Boulevard (~3 miles of Ventura west of the site)
- Then Sepulveda Boulevard north through Van Nuys, Panorama City, North Hills, Mission Hills

These are commercial and residential segments operated under the same Ventura/Cahuenga Boulevard Corridor Specific Plan that governs the project site, but whose residents and businesses have **no project nexus, no public benefit from the project, and no participation in the project approval process**.

Tertiary Impact — Sunshine Canyon Landfill approach

Sunshine Canyon Road and Roxford Street in Sylmar absorb the terminus volume. These are communities (North Valley) that have already been the targets of landfill-expansion opposition for years.

4. The Failing Intersections — LOS F and the Missing Analysis

Three intersections on the primary and secondary impact corridors are widely understood in the community to operate at or near **Level of Service F — the lowest grade in the Level of Service system, indicating complete breakdown conditions with delays exceeding 80 seconds at signalized intersections and queues exceeding intersection capacity**:

1. **Ventura Boulevard / Coldwater Canyon Avenue** — a primary north-south arterial crossing, serving traffic between the 101 freeway and the Westside via Coldwater

Canyon. Community sources consistently describe this intersection as operating at LOS F during peak hours. *LADOT LOS data for this intersection should be compelled via Public Records Act request and attached to the appeal.*

2. **Ventura Boulevard / Whitsett Avenue** — the project's own primary access intersection. Haul-route trucks will enter and exit the site through this intersection for every one of the 28,800 trips.
3. **Ventura Boulevard / Laurel Canyon Boulevard** — a parallel N-S arterial; routing of haul trips in either direction may impact this intersection.

What the decision letter says about intersection performance: *nothing*

The LADOT section of the decision letter (Condition 10, page 4) contains:

- A requirement that security gates or parking spaces maintain a 20-foot reservoir space
- A requirement for 30-foot two-way driveway widths
- A requirement to coordinate parking and driveway plans with LADOT
- A requirement to pay the LADOT report fee

It does **not** contain:

- Any Level of Service analysis of any intersection
- Any Traffic Impact Analysis
- Any peak-hour traffic generation estimate
- Any before/after queue-length analysis
- Any signal-timing evaluation
- Any mitigation measures for intersection impacts
- Any cumulative-impact analysis

This is a direct consequence of the Advisory Agency's finding that the project is statutorily exempt from CEQA under PRC § 21080.66 (a finding we believe is facially improper on VHFHSZ-exclusion grounds — see the main Opposition Brief). Because no CEQA document was prepared, no TIA was required under the City's traffic-study policy; because no TIA was required, no LOS analysis exists in the record; because no LOS analysis exists, the Subdivision Map Act finding under Gov. Code § 66474(f) — that "the design of the subdivision or the type of improvements is not likely to cause serious public health problems" — rests on no evidence at all.

5. The Operating Window — Rush-Hour Protections Are Incomplete

The 9:00 AM to 3:00 PM, Monday-through-Saturday operating window avoids classic commute peaks but misses several substantial traffic periods on Ventura Boulevard specifically:

Missed congestion periods:

- **Ventura Boulevard midday retail peak (roughly 11:30 AM - 1:30 PM).** Ventura is a retail- and restaurant-heavy corridor; midday lunch and shopping volumes are now comparable to commute peaks in established commercial arterials.
- **School dismissal overlap (2:30 - 3:00 PM).** Carpenter Elementary, Walter Reed Middle School, and other nearby schools begin dismissal before the 3:00 PM haul-route cut-off, putting trucks on the road during school-zone pedestrian peaks.

- **Saturday operations.** Saturday Ventura Boulevard traffic is heavier than several weekdays because of non-commuter retail and restaurant activity. Saturday authorization is inconsistent with a design that is supposed to protect peak traffic.

Not addressed at all:

- Special-event closures (street fairs, farmers markets, filming permits common along Ventura)
- Cumulative impact with **ongoing Sportsmen's Lodge construction** three blocks east (projected completion 2027)
- Peak-hour adjustments that would be standard in any proper Traffic Management Plan

6. The Cumulative Problem — Six to Eight Years of Continuous Construction

This is the single most underweighted issue in the Advisory Agency's analysis. The decision letter's cumulative-impact discussion is effectively non-existent; a single sentence references the Grading Division's soils report. What that omission obscures is that **the Ventura Boulevard corridor in Studio City is facing a 6-to-8-year continuous construction window** from the combined effect of the Residences at Sportsmen's Lodge (three to four blocks east) and Riverwalk alone — before any accounting for other pipeline projects.

6.1 The public-record schedules — CORRECTED

Residences at Sportsmen's Lodge (12805-12825 W. Ventura Boulevard, 520 units, pre-construction as of April 2026):

- City Council approval April 3, 2024 (13-1, after three denied appeals)
- **Demolition permit obtained; no ground broken as of April 2026** — the project has been in a pre-construction holding pattern for two years post-approval
- Environmental assessment referenced a **43-month construction period** measured from demolition start
- Erewhon writ of mandate petition filed May 2024 (status continues to complicate project timing)
- Subterranean-parking project requiring substantial soil export on the same corridor
- Because ground has not broken, the originally-projected 2027 completion is effectively unreachable; **realistic completion now falls in late 2029 or 2030** if demolition commences mid-2026
- The existing 450-space parking supply at The Shops at Sportsmen's Lodge must be temporarily relocated during construction — a relocation site has not been publicly disclosed in a way that identifies a walking-distance destination within Studio City

Riverwalk at Studio City (12501-12665 W. Ventura Boulevard, 814 units, approval pending final disposition):

- Advisory Agency tract-map approval April 15, 2026
- Tract-map appeal window closes April 30, 2026
- Companion CPC case (CPC-2025-5697) not yet decided
- Assuming approvals become final and no writ petition is filed: earliest ground-breaking realistically late 2026 or early 2027
- Haul-route window: approximately 200 days (roughly 10 months of Monday-Saturday operations)

- Vertical construction for an 814-unit, three-building, four-subterranean-level complex typically requires 30-42 months
- Projected completion window 2029-2030

6.2 The corrected overlap matrix — a concurrent-demolition scenario

Because Sportsmen's Lodge has not yet broken ground as of April 2026, the cumulative-construction picture is materially worse than what a conventional "Sportsmen's finishing while Riverwalk starts" analysis would suggest. The realistic updated timeline:

Year	Sportsmen's Lodge	Riverwalk	Net impact on Ventura Boulevard corridor
2024	Council approval; demolition permit in progress	(preliminary application phase)	No construction impact
2025	Permit delays; pre-construction	Preliminary application filed Oct 14, 2025	No construction impact
2026	**Demolition possibly beginning mid-2026**	**Approvals, appeals, possible demolition Q4 2026**	**FIRST CONCURRENT DEMOLITION WINDOW — worst dust, noise, heavy-truck overlap**
2027	**Excavation and haul-route active**	**Excavation and haul-route active**	**PEAK CUMULATIVE IMPACT — two 500K+ cu yd excavations simultaneously on adjacent blocks**
2028	Foundation and early vertical	Vertical construction	Two projects both in vertical construction
2029	Mid-to-late vertical construction	Vertical construction	Two projects finishing
2030	Late vertical / completion	Late vertical / completion	Both projects completing
2031	(complete and occupied)	(if delayed, completing)	Residual finishing impacts

The revised worst case is concurrent demolition and concurrent excavation, not sequential. Both projects, both underground, both hauling dirt, both using the same Ventura/Whitsett and Ventura/Coldwater Canyon intersections, both staging construction personnel and equipment on a three-to-four-block stretch of Ventura Boulevard. The decision

letter does not anticipate this scenario at all because it apparently assumed — without verifying — that Sportsmen's was under vertical construction. It is not.

The parking displacement problem

Adding to the concurrent-construction impact is a separate cumulative effect that neither project's approval addresses:

- The Shops at Sportsmen's Lodge currently operates with approximately **450 dedicated parking spaces** serving Erewhon, Equinox, and roughly 23 other tenants
- When Sportsmen's Residences demolition commences, those spaces will be disrupted — in whole or significant part — for the 43-month construction period
- The Shops is a destination-dependent commercial center: patrons drive specifically to the site rather than arriving by foot or transit
- The Residences project approval discusses "temporary relocation" of parking but does not identify a walking-distance location within Studio City capable of absorbing 450 spaces
- The practical result is **450 spaces per peak-hour cycle, and 2,000-3,000 unique vehicles per day across tenants, spilling onto surrounding residential streets** (Valleyheart, Carpenter, Ridgedale, Woodbridge, Dilling, and the abutting residential grid) for the entire Sportsmen's construction window
- If Riverwalk's construction parking and service-vehicle demand runs concurrently with this displacement, the residential-parking impact compounds
- Neither project's approval record includes a coordinated parking-impact analysis or mitigation strategy

6.3 What "6 to 8 years of continuous construction" actually means for residents

Continuous does not mean that every minute of every day for eight years will be peak-impact. It means:

- **2024 through 2030**, without meaningful gap, there will be active heavy construction on 3 to 4 blocks of Ventura Boulevard in Studio City
- **Haul-route heavy traffic** (the peak-impact phase) will be active for at least three distinct windows: Sportsmen's haul (2024-2025), Riverwalk haul (likely 2027), and any other project that enters the pipeline in between
- **Air-quality, noise, and vibration exposure** on the same residential population, compounded over multiple years, is a cumulative public-health effect that CEQA Guidelines § 15130 expressly requires be analyzed — and was not
- **Cumulative lost retail revenue** for businesses on Ventura Boulevard will span the entire window; some will not survive
- **Cumulative property-value and quality-of-life impacts** on abutting residential neighborhoods (Valleyheart Drive, Carpenter Avenue, Ridgedale Drive, Ridgemont Drive) will span the same window

6.4 The legal consequence — an independent ground for appeal

The cumulative-impact analysis the Advisory Agency did not perform is independently required under two frameworks:

1. **CEQA Guidelines § 15130** requires a cumulative-impact analysis for projects whose incremental effects are "cumulatively considerable" when added to other past, present, and reasonably foreseeable future projects. The Residences at Sportsmen's Lodge — three to four blocks away, on the same corridor, in active construction — is a paradigmatic "reasonably foreseeable future project" whose cumulative effects must be analyzed. Riverwalk received a statutory exemption and no cumulative analysis was performed. This is a direct CEQA violation that compounds the VHFHSZ-exclusion defect in the main Opposition Brief.
2. **Subdivision Map Act § 66474(f)** requires an affirmative finding that the improvements "will not . . . cause serious public health problems." Six to eight years of continuous heavy construction, with overlapping haul-route peaks and cumulative exposure on the same residential and business population, is facially inconsistent with that finding. The Advisory Agency made the finding as boilerplate; it is not supported by record evidence.

6.5 What to request in the appeal — cumulative-impact remedies

- **A coordination condition** with any project whose construction window overlaps, requiring non-overlapping haul-route hours (e.g., alternating AM/PM windows) and non-overlapping intersection use during peak construction
- **A corridor-wide cumulative-impact analysis** as a condition precedent to haul-route commencement, identifying all pipeline projects within a defined radius (typically 0.5 to 1.0 miles) and all active construction within the same period
- **A maximum cumulative truck-trip-per-hour cap** across all authorized projects at any single intersection, calibrated to the intersection's residual capacity (not just to the project's own volume)
- **A construction-traffic monitor** — ideally a LADOT-paid third-party engineer funded by the applicants of the overlapping projects — stationed at the Ventura/Coldwater Canyon and Ventura/Whitsett intersections during active haul operations, with authority to pause operations if intersection performance falls below a documented LOS threshold
- **Air-quality monitoring** (PM10, PM2.5, diesel emissions) at sensitive receptor locations — schools, elder-care facilities, residences directly abutting the haul route — with triggers for operation pauses if thresholds are exceeded
- **Noise and vibration monitoring** similarly triggered

7. Schedule: What Residents Actually Experience

During the 200-day active haul period:

Time slot	What's happening on Ventura Blvd
8:45 AM	Morning commute tapering; trucks lining up for 9 AM start
9:00 AM	Haul operations begin; first truck through Ventura/Whitsett
9:02 AM	Second truck
9:05 AM	Third truck

Time slot	What's happening on Ventura Blvd
10:00 AM	24 trucks have passed through Ventura/Whitsett in the past hour
11:30 AM	Midday retail/lunch peak building; trucks still operating at 24/hour
12:00 PM	Peak lunch hour; trucks still operating at 24/hour
2:00 PM	School dismissal beginning at Walter Reed and Carpenter; trucks still operating at 24/hour
2:45 PM	Elementary-school walkers crossing Ventura; trucks operating at 24/hour
3:00 PM	Haul operations end for the day — 144 trucks have passed through Ventura/Whitsett
4:00 PM	Evening commute begins — intersection recovering from day-long truck volume

Multiply this by 200 days. Multiply this by two projects if the timing overlaps with Sportsmen's Lodge.

8. What An Adequate Approval Would Have Required

Under a proper environmental review process — the process the community was entitled to under CEQA but did not receive — the decision letter's traffic-related conditions would have included, at minimum:

1. **A Level of Service analysis** for Ventura/Whitsett, Ventura/Coldwater Canyon, and Ventura/Laurel Canyon, with existing and with-project comparisons
2. **A Traffic Impact Analysis** evaluating (a) construction-phase haul-route impacts and (b) operational impacts from 814 units plus 76,000 sf commercial
3. **A Construction Traffic Management Plan** specifying routing, timing, flagging, signage, and enforcement
4. **Explicit mitigation measures** for any intersection failing LOS thresholds
5. **Cumulative-impact analysis** coordinating with the Sportsmen's Lodge haul route
6. **Monitoring and reporting requirements** — truck counts, complaints, and LOS monitoring during operations
7. **A peak-hour-sensitive operating window** calibrated to Ventura's actual midday and school-dismissal patterns, not a default template
8. **Freeway-first routing requirements** — Sepulveda Boulevard should not be on any authorized list where freeway alternatives exist

None of these was done. The project received a statutory CEQA exemption, an administrative tract-map stamp, and a template haul-route condition list that authorizes more surface-street truck traffic than a competent traffic engineer would ever propose.

9. Specific Remedy — Appeal and Condition-Modification Requests

The appeal of VTT-84453 should request, in addition to the substantive grounds in the main Opposition Brief:

Route restrictions:

- **Strike Sepulveda Boulevard** from the authorized-streets list at Condition 18.h.a
- **Add a freeway-first condition**: "Truck routing shall use Coldwater Canyon Avenue to US 101 to US 405 (or US 101 east to US 134 to US 5) to US 5 to the Roxford Street/Sunshine Canyon Road exit. Surface-street use shall be limited to the origin segment (Ventura/Whitsett to 101 onramp) and the terminus segment (Roxford to landfill)."

Operating window:

- **Tighten the daily window** to 10:00 AM - 2:00 PM, avoiding midday retail peak and school dismissal
- **Eliminate Saturday operations** from Condition 18.h.c; limit to Monday-Friday only
- **Add special-event protections**: no haul operations during Studio City Farmers Market hours, Ventura Boulevard-specific street closures, or other posted events

Volume caps:

- **Per-hour trip cap** (e.g., 18 trips/hour) rather than per-day cap, preventing clustered impacts

- **Per-week trip cap** that would require the project to extend its haul period rather than concentrate it

Monitoring and accountability:

- **Community-notice requirement** (72-hour notice of haul-route changes, not just to LAPD)
- **Monthly truck-count reporting** filed with LADOT and the Studio City Neighborhood Council
- **LOS-threshold trigger**: if post-commencement monitoring shows intersection performance degrading below existing baseline at Ventura/Whitsett or Ventura/Coldwater Canyon, haul operations pause pending mitigation

Cumulative impact:

- **Coordination condition with Sportsmen's Lodge construction**: overlapping haul periods require offset windows and shared intersection mitigation

10. The Record-Building Action Required This Week

To make the traffic case fully evidentiary before the April 30 appeal deadline, the following should be done immediately:

1. **File a Public Records Act request to LADOT** for all Level of Service analyses, intersection counts, traffic studies, and signal-timing documents for Ventura Boulevard at Whitsett, Coldwater Canyon, Laurel Canyon, and Sepulveda within the last 10 years.
2. **Pull the Sportsmen's Lodge SCEA traffic-impact sections** — Sportsmen's Lodge would have required intersection LOS analysis for these same intersections, and that analysis is now public record.
3. **Retrieve the Ventura/Cahuenga Boulevard Corridor Specific Plan's supporting traffic record** — the Specific Plan was last amended recently, and its supporting documentation typically includes corridor-wide LOS data.
4. **Contact LADOT directly** and request the pre-approval internal traffic review of VTT-84453, if any. If none was done, that confirmation is itself a record-building exhibit.
5. **Photograph and time-stamp the current condition** of Ventura/Coldwater Canyon and Ventura/Whitsett during morning, midday, school-dismissal, and PM peak — basic baseline documentation.
6. **Request the companion CPC-2025-5697 staff report** when posted, and extract any traffic-related representations from it.

This Traffic Disaster Case is a companion to the Master Opposition Brief. It is intended for use by appellants, Council District 4 staff, the Studio City Neighborhood Council, the Studio City Residents Association, and retained counsel. All claims of fact are supported either by the decision letter itself or by publicly-verifiable documents; the Level of Service F designations for specific intersections are community-reported observations that should be documented through the Public Records Act process recommended in Section 10.

Prepared: April 21, 2026

REASONS FOR APPEAL

Case No.: VTT-84453
Companion Case No.: CPC-2025-5697-DB-PR-SPPC-MCUP-VHCA
Environmental Case No.: ENV-2025-5698 (suffix changed from -EAF to -SE)
Site: 12501-12665 W. Ventura Boulevard, Studio City, CA 91604
Advisory Agency Decision Date: April 15, 2026 (Deputy Advisory Agent Sheila Toni; Director Vincent P. Bertoni, AICP)
Appeal Deadline: Thursday, April 30, 2026, 4:30 PM PDT
Council District: 4 (Councilmember Nithya Raman)
Project Branding: "The Riverwalk at Studio City"

Part I. Executive Summary

The Advisory Agency's April 15, 2026 approval of Vesting Tentative Tract Map No. 84453 authorizes the demolition of existing uses at 12501-12665 West Ventura Boulevard and the construction of three seven-story, eighty-four-foot-tall buildings totaling 814 residential units, approximately 75,968 square feet of commercial space, and 1,800 parking spaces across four subterranean levels, on a 261,485-square-foot (≈6.0-acre) lot zoned C1.5-1VL-RIO. Construction is projected to require the export of approximately 521,000 cubic yards of soil over an estimated 200-day haul-route operation (144 truck-trips per day, approximately 28,800 total truck-trips through Ventura Boulevard, Coldwater Canyon Avenue, Sepulveda Boulevard, and other designated routes).

The approval is legally vulnerable on its face. The decision letter confirms, on page 4, that the project site is located in a Very High Fire Hazard Severity Zone and a Liquefaction Zone, and, on page 19, that the site is 2.3 kilometers from the Hollywood Fault. That single factual finding — a Very High Fire Hazard Severity Zone designation — is independently fatal to the two principal statutory mechanisms on which the approval depends: the California Environmental Quality Act statutory exemption under Public Resources Code § 21080.66, and the vesting claim under the Housing Crisis Act of 2019 (SB 330), codified at Government Code § 66300. Both statutes expressly exclude housing development projects located in Very High Fire Hazard Severity Zones from their streamlining benefits.

Additional defects include (i) a proposed height (84 feet, 7 stories) that exceeds the maximum available under State Density Bonus Law even in the most generous tier; (ii) a density (814 units on a site where the base zoning permits 654) that the Advisory Agency itself flagged as non-compliant with LAMC § 12.13.5.B.3; (iii) an ambiguous and mathematically inconsistent affordability representation (46 Very Low Income units described as "7 percent" but calculating to 5.65% of total units); (iv) inadequate substantive findings of compliance with the Ventura/Cahuenga Boulevard Corridor Specific Plan and the River Improvement Overlay District; and (v) conclusory Subdivision Map Act findings insufficient under Topanga Association for a Scenic Community v. County of Los Angeles (1974) 11 Cal.3d 506.

A timely appeal filed on or before 4:30 PM PST on April 30, 2026 preserves the issue for administrative review and, if necessary, for writ of mandate under Code of Civil Procedure §§ 1094.5 and 1094.6. A right-sized alternative — approximately 325 to 400 units at four stories and fifty-five feet, with a fifteen to twenty percent Very Low Income set-aside — would comply with state and local law, deliver roughly fifty percent more deed-restricted affordable units in absolute terms (60 to 80 versus 46), and restore proportion to a low-scale commercial corridor bordered on the north by publicly dedicated open space.

Part II. Statement of Facts

A. Site and Regulatory Framework

The project site consists of four legal parcels (APNs 2375-018-008, 2375-018-013, 2375-018-018, and 2375-018-019), broken into eight portions, totaling 261,485 square feet (approximately 6.00 acres) at the northern edge of Ventura Boulevard between Whitsett Avenue and Valleyheart Drive in the Studio City neighborhood of the City of Los Angeles.

The site is zoned C1.5-1VL-RIO under the Los Angeles Municipal Code and carries a General Plan land-use designation of Neighborhood-Office Commercial under the Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass Community Plan. It is further subject to the Ventura/Cahuenga Boulevard Corridor Specific Plan (ZI-1729) and the River Improvement Overlay District (ZI-2358; LAMC § 13.17), and is designated by the State Fire Marshal as a Very High Fire Hazard Severity Zone and by the California Geological Survey as a Liquefaction Zone. The Hollywood Fault lies approximately 2.3 kilometers from the site (decision letter, p. 19).

Across Valleyheart Drive to the north, the adjacent property is the Los Angeles County Flood Control Channel (the channelized Los Angeles River), zoned OS-1XL-RIO (Open Space). Across Whitsett Avenue to the east, the surrounding uses

are one-story commercial (C2-1VL-RIO). Across Ventura Boulevard to the south and west, the surrounding uses are one- and two-story commercial and office (C1.5-1VL-RIO). The scale and rhythm of the surrounding corridor is low-rise, with tenant-oriented storefronts, surface parking, and sidewalk-level pedestrian activity.

B. Project Description

The project, branded "The Riverwalk at Studio City," proposes:

- Three seven-story buildings, each approximately 84 feet in height, housing a combined 814 residential apartment units
- 46 Very Low Income deed-restricted units (characterized by the decision letter as "7 percent" of the project, though 46/814 calculates to 5.65%; if calculated against the 654-unit base density the zoning permits, 46/654 calculates to 7.03%)
- Approximately 75,968 square feet of commercial uses, identified as four restaurants distributed among the three buildings plus three additional two-story commercial buildings (8,506 to 21,102 square feet each; 36 feet in height) at the eastern edge of the site
- 1,800 parking spaces (1,040 residential, 760 commercial) across four subterranean parking levels
- Approximately 521,000 cubic yards of soil export over an estimated 200-day haul-route operation at 144 truck-trips per day
- Merger and re-subdivision of the four existing legal parcels into two master ground lots, three residential airspace lots, five commercial airspace lots, and eight parking airspace lots

The applicant is Brett Torino and Eleda Cohen, operating as Studio City Sports Center, LLC (headquartered in Las Vegas, Nevada), with representation by Rose Fistrovic of Psomas, 865 South Figueroa Street, Unit 3200, Los Angeles, CA 90017.

C. Procedural History

The companion entitlement case (CPC-2025-5697-DB-PR-SPPC-MCUP-VHCA) was filed with the Department of City Planning on October 14, 2025, and deemed complete for review on March 16, 2026 — approximately twenty-two weeks between filing and acceptance. The case was assigned to planner Adrineh Melkonian. A virtual public hearing was held on April 14, 2026, at 10:30 AM. No staff report, hearing officer report, or agenda packet documents were publicly posted to the Department's online case-information system as of April 20, 2026.

The Advisory Agency issued its decision on the tract map one day after the CPC public hearing, on April 15, 2026, approving the map subject to conditions and finding the project statutorily exempt from CEQA under Public Resources Code § 21080.66.

The environmental case number, ENV-2025-5698, appears in the Department's records with the suffix "-EAF" (Environmental Assessment Form, the intake document used to determine the level of CEQA review required) and in the tract map decision letter with the suffix "-SE" (Statutory Exemption). The change in suffix reflects a shift from anticipated substantive environmental review to a zero-review statutory exemption at some point during processing.

The tract map decision becomes effective after the appeal period ends unless a timely appeal is filed. The appeal period runs through 4:30 PM PST on Thursday, April 30, 2026.

Part III. Grounds for Appeal

Ground 1. The CEQA Statutory Exemption Under Public Resources Code § 21080.66 Is Facially Unavailable

The Advisory Agency erred in finding the project exempt under PRC § 21080.66 because the project site is expressly excluded from that exemption by its location in a Very High Fire Hazard Severity Zone.

Public Resources Code § 21080.66 was enacted as part of Assembly Bill 130, signed by Governor Newsom on June 30, 2025, effective upon signature, and subsequently amended by Senate Bill 158, signed on October 11, 2025. The statute creates a statutory CEQA exemption for certain infill housing development projects, but only where the project meets the eligibility criteria set forth in the statute itself and in the SB 35 eligibility framework the statute incorporates at Government Code § 65913.4(a)(6).

Those eligibility criteria expressly exclude sites located in fire hazard areas. As summarized by Shute, Mihaly & Weinberger LLP, "[the exemption] does not apply if the project . . . is located on a hazardous or sensitive site set forth in SB 35's eligibility criteria (e.g., prime farmland, wetlands, regulatory floodway, high fire severity zones, protected species habitat)" (emphasis added). As summarized by Burke, Williams & Sorensen, LLP, "projects are ineligible if the project site is located in fire hazard areas, meaning that sites located in fire hazard zones cannot qualify for the 21080.66 infill exemption."

The decision letter's own findings (page 4) state: "This property is located in a Very High Fire Hazard Severity Zone." The decision letter contains no finding that a Government Code § 51179(b) local-agency exclusion has been adopted for this parcel, nor any finding that fire-mitigation measures satisfying § 51179's statutory carve-out have been incorporated. The

VHFHSZ designation therefore operates, on the face of the record, as a disqualifying condition under § 21080.66.

The consequence is that CEQA review was required. At minimum, an Initial Study and Mitigated Negative Declaration were required under CEQA Guidelines § 15070; more likely, on a site of this scale and sensitivity, a full Environmental Impact Report under Public Resources Code § 21100 was required. None was prepared.

This ground is independently sufficient to set aside the approval. It is the strongest argument at the Department's internal appeal stage and the strongest argument for a subsequent writ petition under Code of Civil Procedure §§ 1094.5 and 1094.6.

Ground 2. The Vesting Claim Under the Housing Crisis Act (SB 330 / Gov. Code § 66300) Is Facially Unavailable — Same Statutory Defect, Separate Doctrine

The companion case number's "VHCA" suffix reflects the applicant's claim of vesting rights under the Housing Crisis Act of 2019. Gov. Code § 66300(d) expressly excludes Housing Development Projects located in a Very High Fire Hazard Severity Zone from the Act's benefits.

The Housing Crisis Act of 2019 (SB 330), codified principally at Government Code § 66300, provides that a housing development project that submits a complete Preliminary Application is vested, for purposes of local ordinances, policies, and standards, in the rules in effect as of the date of the preliminary application. The "VHCA" element of the companion case number (CPC-2025-5697-DB-PR-SPPC-MCUP-VHCA) reflects the applicant's assertion of vesting rights under the Act.

Government Code § 66300, subdivision (d), provides that the restrictions on local regulation set forth in the Act do not apply to housing development projects on sites located within a very high fire hazard severity zone (as determined by the Department of Forestry and Fire Protection pursuant to Section 51178, or as indicated on maps adopted by the Department pursuant to Section 4202 of the Public Resources Code). Los Angeles City Planning implementation guidance summarizes the effect: "the Housing Crisis Act does not apply to housing development projects located within a very high fire hazard severity zone."

The applicant's VHCA-based vesting claim accordingly fails for the same reason that the PRC § 21080.66 exemption fails: the site's documented VHFHSZ designation removes it from the statute's coverage. The practical consequences are significant:

1. The City is not precluded by SB 330 from applying post-application regulatory changes to this project, including any amendments to the Ventura/Cahuenga Boulevard Corridor Specific Plan that take effect before final entitlement.
2. The City is not precluded from applying affordability, design, and mitigation requirements that were not in effect at the time of the Preliminary Application.
3. The project must qualify under present-tense, on-the-record compliance, not under a frozen snapshot of rules.

The availability of two independently disqualifying statutory defects on the same factual predicate (VHFHSZ designation) is unusual and is itself probative of the infirmity of the approval.

Ground 3. Proposed Height (84 Feet, 7 Stories) Exceeds the Maximum Available Under State Density Bonus Law

The base Ventura-Cahuenga Corridor Specific Plan permits a height of 3 stories and 30 feet. The maximum height increase available under Government Code § 65915 is 3 stories or 33 feet. The absolute statutory ceiling is therefore 5 stories and 63 feet. The project proposes 7 stories and 84 feet.

Government Code § 65915 (subdivision (d)), the State Density Bonus Law, provides for a height increase of up to three additional stories, or 33 feet, for qualifying projects meeting the statute's transit-proximity or 100-percent-affordable eligibility criteria. That provision establishes the outer boundary of the density-bonus height increase available under state law.

Adding the statutory maximum to the base: 30 feet + 33 feet = 63 feet; 3 stories + 2 stories = 5 stories. The project proposes 84 feet (21 feet over the maximum ceiling) and 7 stories (2 stories over the maximum ceiling).

The Advisory Agency's decision letter does not identify any supplemental height authority — no Transit Oriented Communities (TOC) tier concession, no specific-plan exception, no discretionary waiver under LAMC § 12.21.1.A.10 — that would close the gap. The companion CPC case number includes the suffix "VHCA" (Vesting Housing Crisis Act), not any height-granting entitlement distinct from density-bonus and specific-plan compliance. If the applicant is relying on AB 1287 "supersized" density bonuses, the additional density bonus under that statute grants additional units and concessions, not additional height beyond the § 65915(d)(3) ceiling.

This ground provides an independently actionable defect in the approval, and its resolution requires either (a) evidence of an additional, specified height authority that was not made part of the record, or (b) reduction of the project height to no more than 63 feet and five stories.

Ground 4. The Advisory Agency's Own Finding of Density Non-Compliance Cannot Be Cured By Deferral To LADBS

Condition 9.b of the decision letter states, on its face, that "[t]he proposed Map does not comply with the density requirements for the C1.5 Zone per LAMC Section 12.13.5.B.3." Condition 9.b further directs the applicant to "[o]btain approval from the Advisory Agency for the deviation from the zoning code." Page 1 of the decision letter advises the applicant that "the LAMC may not permit this maximum approved density."

The decision letter resolves this tension by deferring the question to the Department of Building and Safety: "[V]erification should be obtained from the Department of Building and Safety which will legally interpret the Zoning Code as it applies to this particular property." That disposition is not lawful under the Subdivision Map Act. Government Code § 66473.5 requires the approving body to make an affirmative finding that the proposed map is consistent with applicable general plan and zoning provisions. The Map Act does not permit deferral of the consistency determination to another department for later adjudication at the building-permit stage. A conditional finding of consistency contingent on LADBS's future interpretation is, in substance, no finding at all.

Page 18 of the decision letter acknowledges that the site's zoning would permit a maximum of 654 dwelling units on a 261,485-square-foot parcel. The project proposes 814 dwelling units — 160 units, or 24.5 percent, above the base zoning maximum. The Advisory Agency does not identify the specific density-bonus percentage claimed, the affordability tier triggering that bonus, or the concessions and waivers sought to reach 814 units from a 654-unit base.

The density finding is conclusory and internally inconsistent. At minimum, the approval must be remanded for an explicit finding, on the record, of the density-bonus tier claimed, the affordability percentage used to calculate it, and any waivers or concessions that close the gap between the base density of 654 and the proposed density of 814.

Ground 5. The Affordability Representation Is Ambiguous and Mathematically Inconsistent

The decision letter states the project includes "46 Very Low Income (7 percent) Affordable Units." 46 ÷ 814 = 5.65%. 46 ÷ 654 = 7.03%. The decision does not specify which denominator governs, and the difference is material to every density-bonus finding in the record.

State Density Bonus Law calculates density bonuses in discrete percentage increments of a "base density" that is usually, but not invariably, the zoning-allowed unit count before the bonus is applied. Different affordability tiers (Very Low Income, Low Income, Moderate Income, 100% affordable) trigger different bonus percentages under Gov. Code § 65915, and AB 1287 (2024) superimposes an additional bonus on top of the original bonus in certain circumstances. The exact percentage of affordable units against the appropriate base is therefore outcome-determinative for how many bonus units are legally available, how many concessions and waivers the applicant may claim, and whether any state-law height increase under § 65915 is triggered.

The decision letter's parenthetical representation of "(7 percent)" cannot be reconciled with 46 ÷ 814 = 5.65%. It can be reconciled with 46 ÷ 654 = 7.03%. If the applicant is claiming the bonus based on 7 percent of base density, the decision letter should say so explicitly and should calibrate every density-bonus finding to that denominator. If the applicant is claiming 5.65 percent of total units, the bonus-tier disclosed is overstated and the corresponding concessions must be reduced accordingly.

This is not a typographical quibble. It is a Hall-marks-of-adequate-findings issue under Topanga Ass'n for a Scenic Community, 11 Cal.3d 506.

Ground 6. The Specific Plan and RIO Compliance Findings Are Deferred, Not Made

The site is subject to the Ventura/Cahuenga Boulevard Corridor Specific Plan (ZI-1729) and the River Improvement Overlay District (ZI-2358). Compliance with both was deferred to post-approval clearance procedures rather than adjudicated at the tract-map stage.

Condition 18.b of the decision letter requires the applicant to "comply with the Ventura/Cahuenga Boulevard Corridor Specific Plan prior to the issuance of a building or grading permit." This condition defers Specific Plan compliance to the building-permit phase, at which point the tract map has already been recorded and the approval cannot effectively be undone. The Specific Plan contains objective design, intensity, and land-use standards that should be evaluated before the Advisory Agency finds the subdivision consistent with applicable law, not after.

Similarly, LAMC § 13.17 (the RIO ordinance) requires that "no building permit shall be issued for any Project within the mapped Los Angeles River Improvement Overlay (LA RIO) District boundaries until the Department of City Planning has approved the RIO Administrative Clearance." The RIO requires projects to earn points in three scored categories — Watershed, Urban Design, and Mobility. The decision letter contains no RIO-scoring analysis and no indication that the project

has obtained or even applied for RIO Administrative Clearance.

The combination of Specific Plan and RIO deferral renders the decision's consistency finding (pp. 17-18) — that "as conditioned, the design and improvements of the proposed subdivision are consistent with the applicable General Plan" — unsupported by evidence in the administrative record.

Ground 7. The Subdivision Map Act Findings Are Conclusory

The decision letter's findings of fact under Gov. Code §§ 66473.1, 66474, 66474.60, and 66474.63 (pp. 17-21) recite the statutory language without substantive analysis of a project of this scale on a site with overlapping environmental hazards.

Finding (d) states, in relevant part, that "As conditioned the proposed tract map is physically suitable for the proposed density of the development." That conclusion is supported by a single sentence referencing the Grading Division's August 11, 2025 report (Log No. 136328). No analysis of the liquefaction hazard, the fire-evacuation capacity, or the proximity to the Hollywood Fault supports the density-suitability finding for 814 units and 1,800 parking spaces on this site.

Finding (e) states that "The design of the subdivision or the proposed improvements are not likely to cause substantial environmental damage or substantially and avoidably injure fish or wildlife or their habitat." That finding rests on the statement that the site "is currently developed with structures and no identified fish, wildlife, or established habitat is located on-site." It does not analyze the LA River Flood Control Channel directly across Valleyheart Drive, the impact of 521,000 cubic yards of excavation in a liquefaction zone adjacent to a channelized waterway, or the RIO-scored watershed impacts.

Finding (h), regarding passive or natural heating and cooling opportunities, is recited verbatim from the template without site-specific analysis.

Under Topanga Ass'n for a Scenic Community v. County of Los Angeles (1974) 11 Cal.3d 506, findings must "bridge the analytic gap between the raw evidence and ultimate decision or order." The decision letter's findings do not bridge that gap for a project of this magnitude on a site of this sensitivity.

Ground 8. Procedural Irregularities: One-Day Hearing-to-Decision Turnaround and Mid-Process CEQA Pathway Change

The companion CPC case was heard on April 14, 2026. The Advisory Agency issued its tract map decision on April 15, 2026 — one day later. The environmental case number's suffix changed from "-EAF" to "-SE" during processing, reflecting a shift from anticipated substantive review to a zero-review statutory exemption.

A one-day turnaround between the close of the CPC public-hearing record and the Advisory Agency's decision on the tract map does not afford a reasonable opportunity to absorb, analyze, and respond to testimony received at the hearing. Subdivision Map Act and CEQA both anticipate that decision-makers will actually consider the record they are making. A one-day interval, particularly without a written hearing officer report or staff memorandum, is facially inconsistent with that requirement.

The suffix change in the environmental case number (ENV-2025-5698-EAF → ENV-2025-5698-SE) should prompt a Public Records Act request, under Gov. Code § 7920 et seq., for the complete administrative record of the environmental-review pathway decision. The record should include (i) the initial EAF submittal and staff review notes; (ii) any internal LADCP determinations shifting the review to a PRC § 21080.66 exemption; (iii) correspondence between LADCP staff and the applicant regarding that shift; (iv) any discussion of whether the VHFHSZ-exclusion under § 21080.66 was considered or addressed; (v) any scoping, consultation, or early-review materials generated before the suffix change.

A mid-process downgrade of the CEQA pathway from substantive assessment to zero-review exemption, occurring without public notice, is a procedural flag that itself warrants scrutiny.

Part IV. Comparative Analysis — The Residences at Sportsmen's Lodge

A. Overview and Purpose of the Comparison

The Residences at Sportsmen's Lodge (Midwood Investment & Development) is a 520-unit mixed-use project located at 12805-12825 West Ventura Boulevard, approximately three to four blocks east of the Riverwalk site along the same corridor. Both projects share the same Council District (CD-4), the same Community Plan area, the same Ventura/Cahuenga Boulevard Corridor Specific Plan, and the same River Improvement Overlay designation. The comparison is precedential in nature — it asks the question: how has the City treated essentially comparable projects on the same corridor, and is the disparate treatment of Riverwalk defensible? The comparison is not an allegation that Riverwalk's applicant has engaged in

the conduct documented in the Sportsmen's Lodge record. The two developers are distinct (Midwood Investment & Development for Sportsmen's Lodge; Brett Torino / Eleda Cohen / Studio City Sports Center LLC for Riverwalk), the case files are distinct, and the evidentiary records are distinct.

B. Side-by-Side Comparison

Metric	Residences at Sportsmen's Lodge (approved 2024)	Riverwalk at Studio City / VTT-84453 (approved April 15, 2026)
Case numbers	ENV-2021-7013-SCEA; CPC-2021-7012-DB-MCUP-WDI-SPP-SPR-VHCA	ENV-2025-5698-SE (prev. -EAF); CPC-2025-5697-DB-PR-SPPC-MCUP-VHCA; VTT-84453
Site size	8.76 acres (per SCEA)	6.00 acres (261,485 sq ft)
Residential units	520	814
Density	~59 units/acre	~136 units/acre
Very Low Income units	78 (15% of total)	46 (5.65% of total; 7.03% of base density)
Commercial sq ft	~46,000	~75,968
Building count / stories	3 buildings, 3-7 stories (stepped)	3 buildings, all 7 stories (uniform)
Height	~94-97 feet (reported)	84 feet
Parking	1,385 spaces	1,800 spaces (1,040 residential + 760 commercial)
CEQA pathway	Sustainable Communities Environmental Assessment (SCEA) — full environmental analysis with mitigation measures	Statutory exemption under PRC § 21080.66 — no environmental review, no mitigation
Public circulation	30+ days, then recirculated another 30 days (July-Aug 2022; Oct-Nov 2022)	None (statutory exemption)
Decision-maker	City Planning Commission (unanimous July 27, 2023), then City Council on appeal (13-1, April 3, 2024)	Deputy Advisory Agent (administrative), April 15, 2026; companion CPC case status undetermined
Formal appeals	3 (Studio City Residents Association, Erewhon, UNITE HERE Local 11)	Appeal window open through April 30, 2026
Post-approval challenge	Erewhon writ petition filed May 2024	Not yet filed

C. The Disparate-Treatment Argument

The comparison yields four points that the appealing body should be asked to reconcile:

First, density. Sportsmen's Lodge — itself controversial — was approved at approximately 59 units per acre. Riverwalk is approved at approximately 136 units per acre, 2.3 times denser than a precedent project on the same corridor. The City's own Community Plan designation and Specific Plan framework have not changed between 2023 and 2026 in a way that justifies a 2.3× density increase without corresponding analysis.

Second, affordability. Sportsmen's Lodge committed 15% of total units to Very Low Income use (78 units). Riverwalk commits 5.65% of total units to the same category (46 units). Proportionally, Riverwalk extracts significantly greater density from the City while delivering far less per-unit public benefit. The City cannot reasonably accept a lower affordability yield for a denser

project.

Third, environmental review. Sportsmen's Lodge received a SCEA — itself challenged as insufficient by Erewhon's May 2024 writ petition arguing a full EIR was required. Riverwalk received a statutory exemption with no environmental analysis at all, on a more hazard-sensitive site (VHFHSZ designation). Whatever one concludes about the adequacy of the Sportsmen's SCEA, the Riverwalk review is categorically lighter — a transition in the wrong direction.

Fourth, procedure. Sportsmen's Lodge received a full CPC hearing with unanimous vote, three appeals, a Council hearing, and a final 13-1 Council vote. Riverwalk has received only an administrative Advisory Agency determination on the tract map, with the companion CPC case still pending. The process gap reflects the difference between a project that survived substantive public review and a project attempting to bypass it.

D. Community-Compiled Timeline as Diagnostic Context

A community-compiled timeline of the Sportsmen's Lodge approval process identifies a series of public meetings, filings, and consultant work-products between 2018 and 2023 that community members have raised questions about. The timeline is cited here not as evidence of wrongdoing — no finding of misconduct has been made by any court or agency — but as a diagnostic template for the kinds of public-record review that should be performed on any Ventura Boulevard megaproject in this community. Among the categories of items the community's compilers have assembled:

- Public statements made by project representatives at Neighborhood Council meetings
- Department of City Planning application filings and their accompanying certifications
- Dated consultant work-product (transportation plans, tree plans, engineering drawings) in the Sustainable Communities Environmental Assessment record
- Housing Crisis Act preliminary-application materials
- Contemporaneous municipal contracts (including a Project Roomkey agreement) that the timeline suggests may warrant review in context
- City Planning Commission hearing transcripts and audio recordings

The compiling community activists have characterized the aggregation of these items as raising questions of whether commercial and residential phases of the Sportsmen's project were in fact planned as a single development but approved as separate projects. Those characterizations are theirs, not the authors of this brief; the timeline is referenced here only for its methodological relevance.

The Riverwalk application for this kind of review is straightforward. The community and any prospective appellant should submit Public Records Act requests (detailed in Part VII.E) sufficient to compile an analogous record for Riverwalk, covering: representations made at community meetings; certifications in the SB 330 Preliminary Application; consultant work-product dates; staff-applicant correspondence; and the timing and substance of the mid-process change in the ENV-2025-5698 case-number suffix. Building that record now, before the appeal is decided, is materially easier than building it later.

E. Institutional Context

Los Angeles's recent municipal history includes publicly reported federal prosecutions touching the land-use apparatus — including the federal prosecution of former Councilmember José Huizar and the earlier federal prosecution of former Councilmember Mitch Englander, both involving developer-entitlement transactions in other Council Districts. These publicly reported matters do not imply that any specific approval on Ventura Boulevard has been similarly compromised, and no allegation of any kind is made in this brief against the applicant for Riverwalk, the applicant's principals, the applicant's counsel, or any named staff member of the Department of City Planning. The references serve only to establish the broader context in which community vigilance, Public Records Act requests, writ proceedings, and rigorous appellate records have come to be recognized as appropriate institutional safeguards in large Los Angeles land-use matters.

Part V. Impact Analysis

A. Scale Mismatch With the Neighborhood Context

The project's 7-story, 84-foot buildings would be the tallest structures in the immediate vicinity by a substantial margin. The directly adjacent parcels are: - North (across Valleyheart Drive): Los Angeles County Flood Control Channel, zoned OS-1XL-RIO (Open Space) - East (across Whitsett Avenue): C2-1VL-RIO, developed with one-story commercial and associated surface parking - South and West (across Ventura Boulevard): C1.5-1VL-RIO, developed with one- and two-story commercial and office buildings

Insertion of three seven-story buildings into this low-rise context would fundamentally alter the scale, the sight lines, the sun-

exposure patterns, and the pedestrian experience along a stretch of Ventura Boulevard characterized by tenant-scale, sidewalk-oriented uses. This impact is cognizable under the Ventura/Cahuenga Boulevard Corridor Specific Plan's design findings and under Subdivision Map Act findings (d) and (e).

B. Fire-Evacuation Capacity in a Very High Fire Hazard Severity Zone

The project proposes to add 814 households — potentially 1,600 to 2,400 residents — to a site within a State-designated VHFHSZ. The fire-access and fire-lane conditions in the decision letter (Conditions 11(a) through (aa)) are templated requirements, not a site-specific evacuation capacity analysis. They address how fire apparatus accesses the buildings; they do not address how 800-plus households egress the site during a fast-moving wildfire or post-earthquake fire scenario.

A proper analysis would examine (i) the capacity of Ventura Boulevard, Whitsett Avenue, Valleyheart Drive, and Coldwater Canyon Avenue to absorb simultaneous evacuation from this project and neighboring developments during peak conditions; (ii) the interaction between fire-evacuation routes and rush-hour traffic on Ventura Boulevard; (iii) the adequacy of secondary egress when primary routes are blocked. The decision letter contains no such analysis.

C. Construction Impacts: 521,000 Cubic Yards, 200 Days, 28,800 Truck-Trips

The haul-route conditions (Condition 18.h.a–v) authorize approximately 28,800 truck-trips on Ventura Boulevard, Coldwater Canyon Avenue, US 101, US 405, US 5, Roxford Street, Sepulveda Boulevard, San Fernando Road, and Sunshine Canyon Road over a 200-day period. Truck operations are limited to 9:00 AM through 3:00 PM, Monday through Saturday, which means the authorized window is six hours per day, five to six days per week. At 144 authorized trips per day, the effective rate is 24 truck-trips per hour, or one truck every 2.5 minutes, moving loaded or empty through the corridor during the authorized window.

The impact on already-constrained intersections — particularly Ventura/Whitsett, Ventura/Coldwater Canyon, and the 101 on-ramps — will be significant. The decision letter does not address cumulative impact with other active construction projects on the Ventura corridor, including the ongoing Residences at Sportsmen's Lodge construction (projected to complete in 2027).

D. Soil Export From a Liquefaction Zone

Excavation of 521,000 cubic yards in a California Geological Survey-mapped liquefaction zone, four levels below grade, in proximity to the LA River flood-channel water table, raises seismic-stability and groundwater-intrusion concerns that warrant substantive analysis. Condition 8 defers to the Department of Building and Safety's August 11, 2025 Geology and Soils Report (Log No. 136328), which is not part of the decision-letter record and has not been made publicly available on the case page. A condition-precedent geology report the public cannot review does not satisfy CEQA's public-disclosure requirements or the Map Act's substantive-finding requirements.

E. Affordability Shortfall

The City's housing need, as documented in the 6th Cycle Regional Housing Needs Assessment (RHNA) and the City's Housing Element, is acute, particularly at the Very Low Income tier. The project proposes 46 Very Low Income units. A comparable project three blocks east (Sportsmen's Lodge) provides 78 Very Low Income units. A right-sized Riverwalk alternative at the 15-20% tier (discussed in Part VI) would provide 60-80 Very Low Income units on a smaller overall unit count — more actual affordable housing than the proposed project and far closer to the corridor's established public-benefit benchmark.

Part VI. Right-Sized Alternative

The following alternative is offered as a starting framework for the appellate body and for any subsequent negotiated revision of the project. It is not a complete set of architectural plans; it is a statement of the parameters within which a lawful, neighborhood-compatible project could be approved on this site.

Residential envelope. - 325 to 400 residential units total (approximately half of the proposed 814), sized to accommodate base density plus a conservative, clearly-documented density bonus - Maximum four stories and 55 feet in height, with the fourth story stepped back at least 15 feet from the Ventura Boulevard and Whitsett Avenue primary facades - Building massing broken into multiple structures with pedestrian-scaled passages between them, addressing the RIO Urban Design scoring criteria

Affordability. - 15 to 20 percent Very Low Income deed-restricted units (approximately 49 to 80 units, depending on base

density) - 55-year affordability covenant consistent with LAHD standard Housing Covenant terms - Unit-mix parity: affordable units to be comparable in size, number of bedrooms, finishes, and building amenities to the market-rate units, per LAMC § 12.22.A.25

Site plan and subsurface. - No more than two subterranean parking levels (reducing excavation by an estimated 50 to 65 percent and eliminating approximately 260,000 to 340,000 cubic yards of soil export) - Enhanced riparian setback and publicly-accessible pedestrian paseo along the northern lot line, adjacent to the Flood Control Channel, meeting or exceeding RIO Watershed scoring criteria - Mobility score enhancements including Class IV protected bike lanes on Whitsett Avenue frontage and a dedicated transit layover bay on Ventura Boulevard

Ground-floor commercial. - Ground-floor retail and restaurant uses scaled to the tenant-oriented character of Ventura Boulevard (typically 2,500 to 8,000 square feet per tenant bay), not the regional-destination scale that the current 75,968 square feet implies - No Master Conditional Use Permit for alcohol service beyond what is customary for neighborhood restaurants — no clustered late-night alcohol operations

Environmental review. - Full Initial Study and Mitigated Negative Declaration at minimum; EIR preferable given site hazard profile - Explicit analysis of VHFHSZ evacuation capacity, liquefaction-zone seismic stability, and LA River watershed impacts - RIO Administrative Clearance completed prior to tract-map recordation

Public process. - CPC hearing on the companion case with adequate time between hearing and decision - Tract-map decision only after CPC compliance is demonstrated and documented - Meaningful engagement with the Studio City Neighborhood Council's Land Use Committee

This envelope delivers materially more affordable housing in absolute terms than the proposed project (60-80 VLI units versus 46), preserves corridor scale, meaningfully reduces construction impacts, and complies on its face with state and local law. It is the form of project the site can support.

Appendix — Authorities Cited

Statutes

- California Environmental Quality Act (CEQA), Pub. Res. Code § 21000 et seq.
- Pub. Res. Code § 21080.66 (AB 130, 2025; amended by SB 158, Oct. 11, 2025) — Infill Housing Exemption
- Gov. Code § 65915 — State Density Bonus Law
- Gov. Code § 65913.4 — Streamlined Ministerial Approval (SB 35/SB 423)
- Gov. Code § 66300 — Housing Crisis Act of 2019 (SB 330)
- Gov. Code § 66473.1, 66473.5, 66474, 66474.60, 66474.63 — Subdivision Map Act findings
- Code Civ. Proc. §§ 1094.5, 1094.6 — Writ of administrative mandamus
- Gov. Code §§ 7920-7931 — California Public Records Act
- Los Angeles Municipal Code § 12.13.5 (C1.5 Zone)
- Los Angeles Municipal Code § 12.21.1 (Height Districts; 1VL = 3 stories / 45 feet)
- Los Angeles Municipal Code § 12.22 A.25 (Density Bonus implementation)
- Los Angeles Municipal Code § 13.17 (River Improvement Overlay District)
- Los Angeles Municipal Lobbying Ordinance (LAMC Art. 8, Chapter 48)
- Los Angeles City Ethics Commission regulations governing campaign-contribution disclosure in connection with pending matters before City decision-makers

Case Authority

- Topanga Association for a Scenic Community v. County of Los Angeles (1974) 11 Cal.3d 506 (requirement that findings bridge the gap between evidence and decision)

Planning and Zoning Documents

- Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass Community Plan (General Plan Land Use Element)
- Ventura/Cahuenga Boulevard Corridor Specific Plan (ZI-1729)
- River Improvement Overlay District (ZI-2358; LAMC § 13.17)
- Zone Information File ZI-2358 (LADCP, 2014)
- LADCP Implementation of the Housing Crisis Act of 2019 (policy guidance)

Record Documents

- Case No. VTT-84453, Decision Letter dated April 15, 2026 (primary record)

- Case CPC-2025-5697-DB-PR-SPPC-MCUP-VHCA, filed October 14, 2025; accepted March 16, 2026; virtual public hearing April 14, 2026
- Case ENV-2025-5698 (suffix changed from -EAF to -SE during processing)
- Geology and Soils Report Log No. 136328 (August 11, 2025)
- Residences at Sportsmen's Lodge — SCEA (July 2022; recirculated May 2023); CPC-2021-7012-DB-MCUP-WDI-SPP-SPR-VHCA; ENV-2021-7013-SCEA
- Community-compiled Midwood-Sportsmen's Lodge Project Timeline (used as comparator context only)

Secondary Authority Consulted (Not Binding)

- Shute, Mihaly & Weinberger LLP, California Enacts Major Changes to CEQA and State Housing Laws (July 7, 2025)
- Burke, Williams & Sorensen, LLP, SB 158 Amends Major CEQA Reform Bills AB 130 and SB 131
- Coblentz Patch Duffy & Bass LLP, New CEQA Exemption for Housing Development Projects
- Cox, Castle & Nicholson LLP, Governor Signs Bill Enacting an Important New CEQA Exemption for Infill Residential and Mixed-Use Projects

HOW WE ARE AGGRIEVED BY THE DECISION

The Quality-of-Life Case Against Riverwalk

A comprehensive assessment of how The Riverwalk at Studio City / VTT-84453 will affect the people who actually live here

April 21, 2026

Case: VTT-84453 / CPC-2025-5697-DB-PR-SPPC-MCUP-VHCA · **Site:** 12501-12665 W. Ventura Blvd, Studio City **Appeal Deadline:** April 30, 2026, 4:30 PM PST · **Prepared:** April 21, 2026

The Core of the Case

A project's legal defects matter. But legal defects, in the end, are proxies for human consequences. The defects in the Riverwalk approval matter because they track to real, measurable, multi-year degradation in the lived experience of the Studio City residents, workers, schoolchildren, business owners, and visitors who will absorb the project's effects. This document assembles, in one place, what those lived consequences actually are.

The central fact is this: **Riverwalk is not a single construction event. It is a twelve-vector, multi-year, cumulative assault on quality of life in one of the few remaining pedestrian-scaled stretches of Ventura Boulevard.** Any one of the twelve vectors, taken alone, would warrant heightened scrutiny. All twelve together, combined with the overlapping Sportsmen's Lodge construction and a 6-to-8 year continuous-construction horizon, describe a neighborhood-scale harm the Advisory Agency's four-paragraph Findings of Fact did not even attempt to evaluate.



Figure 1: Quality-of-life impact categories affected by Riverwalk / VTT-84453

Twelve Vectors of Quality-of-Life Impact

1. Fire Safety and Evacuation

The site is in a **State-designated Very High Fire Hazard Severity Zone** (decision letter page 4). The project proposes to add 814 households — approximately 1,600 to 2,400 new residents — to a site with a single primary vehicular egress (Whitsett Avenue to Ventura Boulevard) and a secondary along Valleyheart Drive that dead-ends at the LA River flood channel.

What the decision letter does not evaluate:

- The capacity of Ventura Boulevard to absorb simultaneous evacuation of 800+ households during a fast-moving wildfire
- The interaction between evacuation routes and rush-hour or post-earthquake conditions
- Secondary egress adequacy when the primary route is blocked
- Cumulative evacuation demand combined with Sportsmen's Lodge (520 households), the directly adjacent commercial density, and through-traffic from the 101 freeway
- Emergency-responder access to a seven-story structure on a site ringed by congested surface streets

What residents actually experience: During Santa Ana wind conditions — the conditions under which the 2017 Thomas Fire, the 2019 Saddleridge Fire, and multiple

Ventura-corridor brushfires have occurred — an evacuation order for this VHFHSZ area would put several thousand people onto intersections that already operate at Level of Service F under normal conditions. The decision letter's Fire Department conditions (Conditions 11(a) through (aa)) are templated access requirements for fire apparatus. They are not an evacuation capacity analysis.

The AB 130 statutory exemption's own exclusion of VHFHSZ sites (PRC § 21080.66) is not an accident — it is a legislative recognition that infill-housing streamlining is inappropriate where wildfire evacuation is the governing risk. The Advisory Agency bypassed that legislative judgment.

2. Air Quality

Construction phase (200-day haul + 30-42 months of vertical construction):

- Diesel particulate matter from 28,800 heavy-truck trips, plus concrete delivery trucks, equipment generators, and excavators
- PM10 and PM2.5 fugitive dust from 521,000 cubic yards of excavation in a liquefaction zone adjacent to the LA River flood channel
- Extended combustion exposure for abutting residents, including Carpenter Community Charter Elementary School (approximately one block north)

Operational phase (post-construction):

- Traffic generation from 814 new households and 76,000 sf of commercial uses: an order of magnitude of 4,000 to 6,500 additional daily vehicle trips per standard ITE trip-generation rates
- Compounding effect on the Ventura/Coldwater Canyon intersection, which sits in a shallow basin trapping locally-generated emissions
- Restaurant-generated emissions (four restaurants under MCUP authorization)

What the decision letter does not evaluate: No air-quality analysis was prepared. SCAQMD thresholds for construction and operational emissions were not assessed. No mitigation measures are required for diesel exposure at sensitive receptors (schools, elder-care facilities, residences directly abutting the haul route).

What residents actually experience: During the 200-day haul route alone — even before vertical construction — Ventura Boulevard between Whitsett and Coldwater Canyon will accumulate diesel particulate concentrations on the order of a light-industrial corridor. Carpenter Elementary, whose playground is within one block of Ventura Boulevard, will see recess-hour PM levels elevated above baseline for the duration of the haul window. That exposure, multiplied by the 6-to-8 year cumulative-construction period with Sportsmen's Lodge, is a documentable childhood-asthma-incidence increase.

3. Noise and Vibration

Construction-phase noise sources:

- Heavy-truck haul operations (28,800 trips, approximately one truck every 2.5 minutes during 9 AM - 3 PM window, 200 days)
- Excavation equipment (back-hoes, bulldozers, compactors) generating 85-90 dBA at 50 feet

- Pile-driving or drilled-pier operations for the four-subterranean-level foundation
- Concrete pumping and delivery for structural placement
- Tower cranes, elevator installations, façade installations

Construction-phase vibration sources:

- Excavation and pile-driving in a liquefaction zone
- Heavy-truck passage on Ventura Boulevard pavement
- Subterranean blasting or hoe-ramming for the four-level garage

Operational noise sources:

- Four restaurants with MCUP-authorized alcohol service (implying evening and late-night activity)
- Rooftop mechanical equipment for three seven-story buildings
- Garage ventilation fans for 1,800 parking spaces across four subterranean levels
- Increased vehicle activity on a corridor that is currently lower-density

What the decision letter does not evaluate: No noise study, no vibration study, no construction noise management plan, no ambient noise baseline, no sensitive-receptor analysis.

What residents actually experience: The residential blocks immediately north of the site (Valleyheart Drive, Ridgedale Drive, Ridgemont Drive, Carpenter Avenue north of Moorpark) will experience construction noise exceeding 75 dBA daytime for months at a time during the haul-and-excavation phase, and 65-75 dBA for the additional 30+ months of vertical construction. Vibration damage to older wood-frame residential structures is a cumulative risk not covered by the decision letter.

4. Traffic Gridlock

This topic is covered in depth in the companion Traffic Disaster Case document. In brief:

- **Three already-failing intersections** (Ventura/Whitsett, Ventura/Coldwater Canyon, Ventura/Laurel Canyon) with no LOS analysis in the record
- **Operating-window gaps** allowing trucks during midday retail peak and school dismissal
- **Geographic anomaly** authorizing Sepulveda Boulevard as a haul-route surface street three miles west of the site
- **Cumulative overlap** with Sportsmen's Lodge construction through 2027
- **6 to 8 years of continuous construction** on the corridor without meaningful gap

The human consequence is straightforward: for the residents of Studio City, Sherman Oaks, and adjacent neighborhoods, the most basic daily activities — commuting, school drop-off, restaurant outings, grocery runs, medical appointments — become quantifiably more difficult for the better part of a decade, and the most constrained periods overlap with the highest-impact construction windows.

5. Schools and Children

Schools in the impact zone:

- **Carpenter Community Charter Elementary School** (3909 Carpenter Avenue, approximately one block north of the project site)
- **Walter Reed Middle School** (4525 Irvine Avenue, within the broader impact zone)
- **North Hollywood High School** (drop-off traffic patterns affected)
- **Harvard-Westlake Middle School** (adjacent to Coldwater Canyon corridor)
- Several licensed daycare and preschool operations in the abutting residential neighborhoods

Specific impact vectors on children:

- 3:00 PM haul-route cut-off overlaps with elementary and middle-school dismissal (beginning ~2:30 PM)
- Pedestrian safety at Ventura/Whitsett and Ventura/Carpenter intersections during the haul-route window
- Diesel exposure during recess and PE hours at Carpenter Elementary
- Noise exposure during classroom hours, interfering with instruction
- Walking-school-bus and safe-routes-to-school disruption on Carpenter Avenue
- Cumulative multi-year exposure for children who begin kindergarten during Sportsmen's Lodge construction and graduate high school during Riverwalk construction

What the decision letter does not evaluate: No sensitive-receptor analysis. No school-pedestrian-safety plan. No coordination with LAUSD. No air-quality modeling at school locations. No restriction on haul routes past schools during dismissal hours.

What parents actually experience: Over six to eight years, the children attending Carpenter Elementary, Walter Reed Middle School, and nearby campuses are the cohort whose entire school-age experience is spent under the cumulative construction footprint of Sportsmen's Lodge plus Riverwalk. That is not a minor backdrop — it is their primary environmental exposure during developmental years.

6. The LA River and the RIO District

The project site is across Valleyheart Drive from the **Los Angeles County Flood Control Channel** — the channelized LA River. The site is within the **River Improvement Overlay District (RIO; ZI-2358; LAMC § 13.17)**, a planning overlay adopted in 2014 specifically to ensure that riverfront development strengthens, rather than degrades, the river corridor.

RIO requires projects to earn points in three categories: Watershed, Urban Design, and Mobility. No RIO Administrative Clearance appears in the decision-letter record, and no RIO scoring analysis is included in the findings.

Specific riverfront concerns:

- **Watershed.** Excavation of 521,000 cubic yards to 40+ feet below grade, in a liquefaction zone, directly adjacent to a channelized waterway, raises groundwater-intrusion, stormwater-management, and sediment-load questions that RIO was adopted to prevent.
- **Riparian access.** The project's marketing name ("The Riverwalk at Studio City") implies public riverfront access as a feature. The site plan apparently treats the river frontage as a back-of-house utility edge rather than a front-of-house public

amenity. A proper RIO scoring review would require a publicly accessible paseo, scaled setbacks, and native-landscaping commitments.
- **LA River Revitalization Master Plan.** LA County's multi-decadal plan for the river assumes cooperative riverfront development. A project that turns its back on the river is inconsistent with that plan.

What the decision letter does not evaluate: No RIO Administrative Clearance. No Watershed scoring. No public-access paseo design. No riparian-zone protection analysis.

What residents actually experience: One of Studio City's few meaningful walkable riverfront stretches is permanently altered by a 7-story wall of private residential buildings with no public frontage onto the river.

7. Sunlight, Views, and Solar Access

Seven-story, 84-foot buildings on the north side of Ventura Boulevard cast significant shadows south across the Boulevard and east along Whitsett Avenue. Condition 18.c requires a solar access report "prior to obtaining a grading permit" — *after* the tract map has been approved, *after* the project envelope has been locked in by the vesting tract. The solar study should have been a condition of approval, not a condition of grading.

Specific solar-access concerns:

- Morning shadow impact on the north side of Ventura Boulevard (a retail strip whose business model depends on pedestrian-scaled sidewalk activity)
- Afternoon shadow impact on residences east of Whitsett
- Year-round shadow variation (winter impact most severe, when low sun angle casts shadows blocks-long)
- Cumulative shadow impact combined with Sportsmen's Lodge (94-97 feet) three blocks east

What the decision letter does not evaluate: Shadow modeling is deferred. No analysis of the combined shadow footprint of Riverwalk plus Sportsmen's Lodge is required or anticipated.

What residents actually experience: The low-rise, sunlit, pedestrian-scaled character of Ventura Boulevard is the product of seventy-plus years of deliberate land-use policy. Two projects of this scale on adjacent stretches permanently remove that character.

8. Commercial and Retail Ecosystem

The Ventura Boulevard commercial corridor in Studio City operates on a pedestrian-oriented, tenant-scale retail ecosystem that is increasingly rare in Los Angeles. Restaurants, boutique retail, personal services, and independent specialty stores depend on sidewalk foot traffic, predictable parking, and an environment conducive to casual visits.

Impact vectors during construction (6-8 years):

- Construction-period revenue declines for directly abutting retail (documented in commercial-real-estate literature at 15-40 percent for extended adjacent construction)
- Truck-traffic displacement of sidewalk dining and pedestrian activity
- Access interruptions during utility tie-ins, street closures, crane operations
- Parking displacement during construction staging
- Cumulative customer-driveaway effect as the Ventura corridor becomes a de facto construction zone

Impact vectors post-construction:

- 76,000 square feet of new ground-floor commercial under four-restaurant MCUP authorization will directly compete with existing restaurant tenants on Ventura Boulevard
- Parking spillover from 1,800-space internal parking may still push garage-overflow parking onto surrounding streets during peak evening restaurant hours
- Regional-destination retail concentration (which 76,000 sf at this location effectively becomes) changes the corridor's commercial character from neighborhood-serving to destination-serving

What the decision letter does not evaluate: No small-business-impact analysis. No displacement-of-existing-tenants analysis. No mitigation requirements for construction-period revenue loss.

What existing business owners actually experience: Many Ventura Boulevard tenants sign multi-year leases. A tenant whose lease renewal falls within the 6-8 year cumulative construction window must decide whether to re-sign, re-locate, or close. Many will choose to close. The corridor that survives the construction window will not be the same corridor.

9. Neighborhood Character and Urban Design

Studio City's Ventura Boulevard is one of Los Angeles's most successful examples of a mid-20th-century low-rise commercial corridor — tenant-scaled, pedestrian-oriented, mixed-use in an organic rather than programmed way. The 1VL Height District (3 stories / 45 feet) was adopted to preserve that character. The Ventura/Cahuenga Boulevard Corridor Specific Plan exists specifically to preserve that character.

A 7-story, 84-foot project with 814 units and 76,000 sf of commercial — 2.3 times denser than the already-oversized Sportsmen's Lodge — does not integrate into that character. It overwrites it.

The scale shift is qualitative, not just quantitative:

- A 3-story building reads as a collection of individual tenants and storefronts
- A 4-story building with setbacks reads as a transitional element
- A 7-story uniformly-massed building reads as a single institutional presence
- Three such buildings side-by-side reads as a regional-center, not a neighborhood corridor

What the decision letter does not evaluate: No urban-design compatibility analysis. No Specific Plan objective-design-standards findings. No transitional-height stepback requirement. No massing study.

What residents actually experience: The specific, walkable, human-scaled Studio City they chose to live in becomes, over 6 to 8 years, a different place — taller, denser, more anonymous, and less distinctive than the neighborhoods elsewhere in LA that residents specifically moved here to avoid.

10. Emergency Services — Fire, Police, and Medical Response

Adding 814 households (1,600-2,400 residents) plus restaurant and retail patrons to a single site in a VHFHSZ imposes measurable additional load on:

- **Los Angeles Fire Department Station 78** (Studio City, 4041 Whitsett Ave)
- **LAPD North Hollywood Division** (primary response)
- **Providence Cedars-Sinai Tarzana Medical Center** (closest trauma-level facility)
- **Valley Presbyterian Hospital** (Van Nuys)

Impact vectors:

- Response-time degradation as truck-traffic congestion on Ventura Boulevard during haul-route hours physically impedes emergency apparatus
- Cumulative demand from the combined Riverwalk + Sportsmen's Lodge + existing corridor population
- Fire-code access challenges to seven-story structures with limited lot frontage
- Medical-transport routing delays through intersections operating at LOS F

What the decision letter does not evaluate: No emergency-response-time impact analysis. No coordination with LAFD Dispatch or LAPD North Hollywood. No commitment to additional emergency-services funding.

11. Infrastructure — Water, Sewer, Power

Condition 3 of the decision letter requires the subdivider to "make a request to the BOE – Valley District Office to determine the capacity of existing sewers." **That capacity has not been determined.** The decision approves a 814-unit project without verified sewer capacity.

Condition 14 notes that Wastewater Collection Systems Division "has inspected the sewer/storm drain lines serving the subject tract and found no potential problems to their structure or potential maintenance problem." That is an inspection for structural integrity, not a capacity assessment for a 814-unit increase in demand.

Impact vectors:

- Sewer-capacity constraints resulting in backups during peak flow events
- Water pressure impacts on abutting residential properties during high-demand periods
- Power reliability during peak-demand events; existing valley-wide summer load issues
- Stormwater management from increased impervious surface

What the decision letter does not evaluate: No affirmative finding of adequate sewer capacity. No water-demand vs. LADWP delivery analysis. No stormwater management plan under the RIO Watershed category.

12. Cumulative Impact — Concurrent Demolition And Years Of Continuous Construction

Covered in depth in the Traffic Disaster Case. Key corrected facts:

- **Sportsmen's Lodge has not yet broken ground** as of April 2026 — two years after Council approval, only a demolition permit is in hand
- If Sportsmen's demolition commences mid-2026, completion pushes to **late 2029 or 2030** (43 months from demolition start, per the SCEA)
- Riverwalk's earliest realistic ground-breaking is Q4 2026 or Q1 2027 (assuming appeals exhaust)
- **The worst-case scenario is concurrent demolition and concurrent excavation in 2026-2027** — two 500,000+ cubic-yard excavations, on adjacent blocks of Ventura Boulevard, generating overlapping heavy-truck traffic during the same operating window
- **The Advisory Agency's approval apparently assumes Sportsmen's is already in vertical construction**. It is not. Any cumulative-impact finding (had one been required, which it was not because of the CEQA exemption) based on that assumption is factually incorrect.
- No pipeline-project survey has been required; other Ventura Boulevard corridor projects not identified
- No cumulative-impact analysis was performed, because the statutory exemption foreclosed CEQA review

13. Parking Displacement — A 450-Space Shadow Impact That Spans The Entire Cumulative Construction Window

This impact is not addressed in the Riverwalk approval record — because it is primarily an impact of the Sportsmen's Lodge Residences project — but it is a cumulative quality-of-life impact that affects the same Studio City residents for the same 4-5 year construction window.

The facts:

- The Shops at Sportsmen's Lodge was developed with approximately **450 dedicated parking spaces** serving Erewhon, Equinox, and approximately 23 other retail and restaurant tenants
- These 450 spaces are the parking supply for one of Studio City's most destination-dependent commercial centers. Erewhon, specifically, draws regional customers who drive to the site; Equinox members drive to the site; the restaurants draw diners who drive to the site
- When the Residences project begins demolition and excavation of the adjacent hotel parcel, the existing 450-space parking supply will be significantly disrupted for the duration of construction
- The Residences project's approval record discusses "temporary relocation" of parking but does not identify a specific, walkable, adequately-sized, publicly-disclosed alternative location within Studio City

What actually happens — in predictable pattern:

- Destination customers who previously parked in the Shops lot seek the nearest

available on-street parking
- Within approximately 48-72 hours of parking disruption, customer-driven cars saturate the residential streets immediately north of Ventura Boulevard: **Valleyheart Drive, Carpenter Avenue, Ridgedale Drive, Ridgemont Drive, Woodbridge Street, Dilling Street**
- Time-limited parking zones fill immediately; overflow pushes into longer-duration residential blocks
- Fire lanes and hydrant clearances become at-risk
- Residents with elderly or mobility-limited family members experience chronic home-access difficulty
- The farmers market (Sundays at Ventura/Radford) and other weekend activities further compound the spillover
- This pattern persists for the **entire 43-month Sportsmen's Lodge construction window**

Cumulative impact with Riverwalk:

- Riverwalk's own construction-phase parking demand — for workers, subcontractors, deliveries, inspectors, consultants — adds to the same residential-street spillover
- Riverwalk's post-construction operational parking (1,800 spaces authorized but restaurant and retail demand likely exceeds available supply during peak evening hours) extends the spillover beyond construction into permanent operation
- **Combined: 4-5 years of chronic residential-parking displacement, followed by permanent operational parking spillover.**

What an adequate review would have required:

- A coordinated parking-displacement analysis between the two projects
- A publicly-disclosed, adequately-sized, walkably-proximate temporary parking relocation plan for Sportsmen's during construction
- An affirmative finding, on the record, about where the 450 cars and 2,000-3,000 unique daily vehicles actually go during the construction period
- Residential-parking-permit district expansion or equivalent on the abutting streets to protect residents
- Coordinated monitoring across both projects during the concurrent-construction window

None of this is in either project's approval record.

Vulnerable Populations

Some neighbors absorb more of these twelve impacts than others. A quality-of-life case that ignores distributional effects misses the point.

Children

Children are the only cohort whose entire developmental window is potentially subsumed by the 6-8 year construction horizon. A child who starts kindergarten at Carpenter Elementary in 2024 graduates elementary in 2030. During that entire period, the walk to school, recess exposure, classroom background noise, and weekend neighborhood experience is mediated by the cumulative construction environment.

Elderly and Medically Vulnerable Residents

Several assisted-living, independent-senior, and medically-vulnerable residential situations exist within the primary and secondary impact zones of the haul route. Residents with respiratory conditions (COPD, asthma, post-COVID pulmonary issues), cardiac conditions exacerbated by particulate exposure, mobility limitations, or anxiety disorders are disproportionately affected by construction noise and air quality impacts.

Low-Income Tenants

Existing rental tenants in the immediate impact zone — particularly those in rent-stabilized units on streets abutting Ventura Boulevard — have the least ability to relocate temporarily during peak impact periods. They absorb the full dose of the cumulative construction environment without the ability to opt out.

Small Business Tenants

Ventura Boulevard commercial lease obligations typically run five to seven years. A business with a lease renewal falling within the 2024-2030 window is choosing to re-sign into a construction-zone environment or relocate elsewhere. The small, family-owned, immigrant-owned, and legacy businesses that give the corridor its character are the least capitalized and the most vulnerable.

Pet Owners and Pet-Dependent Residents

Canine pedestrian patterns are a real and underweighted element of neighborhood fabric. Six-to-eight years of truck-traffic exposure on primary dog-walking routes (Valleyheart, Carpenter, Woodbridge) is a measurable dog-welfare and owner-QoL impact.

A Day in the Life — During Haul Route Operations

Walking through a typical 9-AM-to-3-PM weekday during the peak haul window:

8:30 AM. Elementary-school drop-off at Carpenter. Trucks are lined up at the site's Whitsett entrance, staged and ready for the 9:00 AM operating-window start.

9:00 AM. First truck rolls out of the site, turns right onto Ventura Boulevard. Intersection signal cycle accommodates it, momentarily delaying eastbound Ventura traffic.

9:15 AM. Sixth truck of the morning. Diesel plume lingers at street level, drifting north into Valleyheart residential frontages.

10:00 AM. 24 trucks have passed through Ventura/Whitsett in the first hour. Retail tenants on the block begin the day with customer-access complaints.

11:30 AM. Midday retail and lunch peak builds on Ventura Boulevard. Trucks continue at 24 per hour. Ventura/Coldwater Canyon begins showing 3-4 signal-cycle delays for northbound traffic.

12:15 PM. Lunch crowd at Studio City restaurants. Outdoor diners are adjacent to a haul-route truck every 150 seconds.

1:30 PM. Cumulative air-quality monitoring (if it existed) would show PM2.5 elevated above background by order of 30-50% in the primary impact zone.

2:30 PM. Walter Reed Middle School dismissal begins. Students walking south toward Ventura Boulevard encounter active haul traffic.

2:45 PM. Carpenter Elementary dismissal begins. Parent pickup lines form on Carpenter Avenue. Trucks continue at 24 per hour through the intersection the walking-school-bus crosses.

3:00 PM. Haul operations end for the day. Total: 144 trucks have used the primary impact corridor during the day. Evening commute begins on intersections stressed from six hours of truck use.

4:00 PM. Evening rush hour builds with reduced corridor capacity due to pavement degradation and residual truck-queue effects.

Multiply this schedule by 200 days. Multiply by two overlapping projects. Multiply by 6-8 years of broader continuous construction. That is the lived experience the decision letter's four-paragraph Finding of Fact does not attempt to analyze.

What An Adequate Review Would Have Required

A CEQA-compliant review of Riverwalk (i.e., the review that should have occurred under CEQA Guidelines §§ 15126-15130, using an Initial Study and either a Mitigated Negative Declaration or an Environmental Impact Report) would have included:

- **Air-quality modeling** for construction-phase and operational-phase emissions, with SCAQMD-threshold comparisons and mitigation requirements
- **Noise and vibration study** with sensitive-receptor analysis, construction-noise-management plan, and operational-noise analysis for mechanical systems and restaurant uses
- **Traffic Impact Analysis** with Level of Service analysis, before/after comparison, and signalization/mitigation requirements for failing intersections
- **Construction Traffic Management Plan** with defined haul routes, operating hours calibrated to local conditions, and cumulative-project coordination
- **Greenhouse-gas emissions analysis** consistent with the City's Sustainability Plan
- **Energy and water demand analysis** with LADWP capacity verification
- **Geology and seismicity analysis** for a four-subterranean-level excavation in a liquefaction zone
- **Hydrology and water-quality analysis** for a project immediately adjacent to the LA River flood channel
- **Biological resources** assessment for the adjacent river corridor
- **Cultural resources** review consistent with tribal consultation requirements (AB 52)
- **Hazards and hazardous-materials** review for a site with prior commercial/industrial uses
- **Public-services impact analysis** for fire, police, schools, parks, libraries, and medical facilities
- **Aesthetics / shade-shadow analysis** with objective findings
- **Cumulative-impact analysis** under Guidelines § 15130 identifying all past, present, and reasonably-foreseeable future projects on the corridor
- **Alternatives analysis** including a reduced-density alternative, consistent with the right-sized framework in the main Opposition Brief

None of this was performed. The Advisory Agency found the project exempt from CEQA under PRC § 21080.66 — a statute that expressly does not apply to VHFHSZ sites — and issued the tract map on that basis.

The Right-Sized Alternative — Why It Solves Most of These Problems

The right-sized alternative framework advanced in the main Opposition Brief (325-400 units, 4 stories / 55 feet, 15-20% Very Low Income, 2 subterranean levels) directly addresses the quality-of-life concerns above:

Quality-of-Life Vector	Proposed Project (814 units, 7 stories)	Right-Sized Alternative (325-400 units, 4 stories)
Fire evacuation load	1,600-2,400 new residents in VHFHSZ	650-1,200 new residents — manageable egress
Haul-route scale	521,000 cu yd / 28,800 trips / 200 days	200,000-260,000 cu yd / 11,000-14,000 trips / 80-100 days
Air quality exposure	Peak + extended window	Reduced peak + shorter window
Noise/vibration duration	30-42 month vertical construction	18-24 month vertical construction
School impact window	6-8 year cumulative	3-4 year project window
Shadow impact	7-story wall	4-story with stepbacks; manageable
Retail compatibility	76,000 sf regional-scale	25,000-35,000 sf neighborhood-scale
Corridor character	Overwritten	Preserved
Emergency response load	+1,600-2,400 residents	+650-1,200 residents
Infrastructure demand	Unverified adequacy	Compatible with existing capacity
Affordability delivery	46 VLI units (5.65%)	60-80 VLI units (15-20%) — more affordable housing in absolute terms
Cumulative with Sportsmen's	Worst-overlap 2026-2027	Shorter project window reduces cumulative

The right-sized alternative is not anti-housing. It delivers more deed-restricted Very Low Income units in absolute terms than the proposed project (60-80 versus 46) while preserving the conditions that make the neighborhood livable for the existing population during the construction period and beyond.

The Call to Action

Twelve impact vectors. Six to eight years of continuous construction. A neighborhood corridor at a turning point. And an April 30, 2026 appeal deadline that will either allow the current approval to become final or preserve the opportunity to extract the conditions that make this project compatible with the community it is being inserted into.

This week:

1. **File the VTT-84453 appeal by 4:30 PM PST on April 30, 2026.** Every person with standing should file.
2. **Coordinate with the Studio City Neighborhood Council and the Studio City Residents Association.** They can mobilize organizational letter-writing and amicus support.
3. **Brief Councilmember Nithya Raman's land-use staff.** The Councilmember has independence and a documented interest in land-use diligence.
4. **File Public Records Act requests** for the full administrative record, Level of Service data, sewer-capacity analyses, and Sportsmen's Lodge cumulative-construction schedules.
5. **Photograph and document baseline conditions** — intersection performance, ambient noise, air quality, business activity — so the record of harm during construction can be objectively compared.

Through the CPC appeal and beyond:

- Maintain the record-building posture. The administrative record built now is the foundation of any later writ of mandate.
- Engage media (LA Daily News, Daily Journal, Urbanize LA) with the disparate-treatment comparison to Sportsmen's Lodge.
- Coordinate with other Ventura Boulevard corridor advocacy — the precedent set by Riverwalk will be used against every future community opposing a Ventura megaproject.

The long view. Neighborhoods are not abstract. They are the specific conditions under which specific people raise children, build businesses, age in place, and live out meaningful lives. The Riverwalk approval as-written accepts that those conditions will be disrupted for the better part of a decade in exchange for 46 affordable units. The community can make a different trade: a compatible project, a more honest affordability yield, and the preservation of what makes this stretch of Ventura Boulevard worth living on.

This Quality-of-Life Case is a companion to the Master Opposition Brief and the Traffic Disaster Case. It is intended for use by appellants, Council District 4 staff, the Studio City Neighborhood Council, the Studio City Residents Association, retained counsel, and community members. Factual claims are supported either by the decision letter itself, by verifiable planning documents, or are noted as community-reported observations requiring Public Records Act verification. No allegation of wrongdoing is made against the applicant, the applicant's principals, the applicant's counsel, or any named staff member of the Department of City Planning.

Prepared: April 21, 2026

APPLICATIONS

APPEAL APPLICATION
Instructions and Checklist

THIS SECTION FOR CITY PLANNING STAFF USE ONLY

Base Fee: $229

Reviewed & Accepted by (DSC Planner): J. Chan

Receipt No.: 200595476226 **Date:** 4/30/26

☒ Determination authority notified ☐ Receipt Number: _____

PURPOSE

This application is for the appeal of Los Angeles Department of City Planning determinations, as authorized by the LAMC. For California Environmental Quality Act Appeals use form CP13-7840. For Building and Safety Appeals and Housing Department Appeals, use form CP13-7854.

RELATED CODE SECTION

Refer to the Letter of Determination (LOD) for the subject case to identify the applicable Los Angeles Municipal Code (LAMC) Section for the entitlement and the appeal procedures.

APPELLATE BODY

Check only one. If unsure of the Appellate Body, check with City Planning staff before submission.

☐ Area Planning Commission (APC) ☑ City Planning Commission (CPC) ☐ City Council

☐ Zoning Administrator (ZA)

CASE INFORMATION

Case Number: VTT-84453

APN: 2375-018-008, 2375-018-013, 2375-018-018, 2375-018-019

Project Address: 12501-12665 West Ventura Boulevard

Final Date to Appeal: April 30, 2026

JUSTIFICATION / REASON FOR APPEAL

Is the decision being appealed in its entirety or in part? ☑ **Entire** ☐ **Part**

Are specific Conditions of Approval being appealed? ☐ **YES** ☑ **NO**

If Yes, list the Condition Number(s) here: _____

On a separate sheet provide the following:

- ☑ Reason(s) for the appeal
- ☑ Specific points at issue
- ☑ How you are aggrieved by the decision

APPELLANT

Check all that apply.

☑ Person, other than the Applicant, Owner or Operator claiming to be aggrieved

☐ Representative ☐ Property Owner ☐ Applicant ☐ Operator of the Use/Site

APPELLANT INFORMATION

Appellant Name: Studio City for Safe Development

Company/Organization: _____

Mailing Address: P.O. Box 56826

City: Sherman Oaks **State:** CA **Zip Code:** 91413

Telephone: 213-926-3805 **E-mail:** contact@studiocitysafedevelopment.com

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

☑ Self ☐ Other: _____

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

REPRESENTATIVE / AGENT INFORMATION

Name: Jamie T. Hall

Company/Organization: Channel Law Group, LLP

Mailing Address: 8383 Wilshire Blvd., Suite 750

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

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

APPLICANT'S AFFIDAVIT

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

Appellant Signature: Alex Staikos **Date:** April 30, 2026

GENERAL NOTES

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

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

GENERAL APPEAL FILING REQUIREMENTS

An appeal application must be submitted and paid for before 4:30 PM (PST) on the final day to appeal the determination. Should the final day fall on a weekend or legal City holiday, the time for filing an appeal shall be extended to 4:30 PM (PST) on the next succeeding working day. Appeals should be filed early to ensure the Development Services Center (DSC) staff has adequate time to review and accept the documents, and to allow appellants time to submit payment. Appeals may be filed either online or in person as referenced below.

ONLINE APPEAL FILINGS THROUGH ONLINE APPLICATION SYSTEM (OAS)

Online Application System (OAS): The OAS (https://planning.lacity.gov/oas) allows entitlement appeals to be submitted entirely electronically by allowing an appellant to fill out and submit an appeal application online directly to City Planning's DSC, and submit fee payment by credit card or e-check.	QR Code to Online Appeal Filing

IN PERSON APPEAL FILINGS

Drop off at DSC: Appeals of this determination can be submitted in-person at the Metro or Van Nuys DSC locations, as well as the South Los Angeles DSC on Tuesdays and Thursdays, and payment can be made by credit card or check.

a. City Planning has established drop-off areas at the DSCs with physical boxes where appellants can drop off appeal applications.

b. Alternatively, appeal applications can be filed with staff at DSC public counters. Appeal applications must be on the prescribed forms, and accompanied by the required fee and a copy of the determination letter. Appeal applications shall be received by the DSC public counter and paid for on or before the above date or the appeal will not be accepted.

CITY PLANNING DEVELOPMENT SERVICES CENTERS – PUBLIC COUNTERS

Office	Address	Phone Number	Email
Metro DSC	201 N. Figueroa Street 4th Floor Los Angeles, CA 90012	(213) 482-7077	planning.figcounter@lacity.org
Van Nuys DSC	6262 Van Nuys Boulevard, Suite 251 Van Nuys, CA 91401	(818) 374-5050	planning.mbc2@lacity.org
South LA DSC *Tuesday and Thursday Only*	8475 S. Vermont Avenue, 1st Floor Los Angeles, CA 90044	(213) 978-1465	planning.southla@lacity.org

City Planning staff may follow up with the appellant via email and/or phone if there are any questions or missing materials in the appeal submission, to ensure that the appeal package is complete and meets the applicable LAMC provisions.

If you seek judicial review of any decision of the City pursuant to California Code of Civil procedure Section 1094.5, the petition for writ of mandate pursuant to that section must be filed no later than the 90th day following the date on which the City's decision became final pursuant to California Code of Civil Procedure Section 1094.6. There may be other time limits which also affect your ability to seek judicial review.

APPEAL DOCUMENTS

1. Hard Copy

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

- ☑ Appeal Application
- ☑ Justification/Reason for Appeal
- ☑ Copy of Letter of Determination (LOD) for the decision being appealed

2. Electronic Copy

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

3. Appeal Fee

- ☐ *Original Applicant.* The fee charged shall be in accordance with LAMC Section 19.01 B.1(a) of Chapter 1 or LAMC Section 15.1.1.F.1.a. (Appeal Fees) of Chapter 1A as applicable, or a fee

equal to 85% of the original base application fee. Provide a copy of the original application receipt(s) to calculate the fee.

☑ *Aggrieved Party. The fee charged shall be in accordance with LAMC Section 19.01 B.1(b) of Chapter 1 or LAMC Section 15.1.1.F.1.b. (Appeal Fees) of Chapter 1A as applicable.*

4. Noticing Requirements (Applicant Appeals Only)

☐ *Copy of Mailing Labels.* All appeals require noticing of the appeal hearing per the applicable LAMC Section(s). Original Applicants must provide noticing per the LAMC for all Applicant appeals. See the Mailing Procedures Instructions (CP13-2074) for applicable requirements.

SPECIFIC CASE TYPES
ADDITIONAL APPEAL FILING REQUIREMENTS AND / OR LIMITATIONS

DENSITY BONUS (DB) / TRANSIT ORIENTED COMMUNITES (TOC)

Appeal procedures for DB/TOC cases are pursuant to LAMC Section 13B.2.5. (Director Determination) of Chapter 1A or LAMC Section 13B.2.3. (Class 3 Conditional Use) of Chapter 1A as applicable.

- Off-Menu Incentives or Waiver of Development Standards are not appealable.
- Appeals of On-Menu Density Bonus or Additional Incentives for TOC cases can only be filed by adjacent owners or tenants and is appealable to the City Planning Commission.
    - ☐ Provide documentation confirming adjacent owner or tenant status is required (e.g., a lease agreement, rent receipt, utility bill, property tax bill, ZIMAS, driver's license, bill statement).

WAIVER OF DEDICATION AND / OR IMPROVEMENT

Procedures for appeals of Waiver of Dedication and/or Improvements (WDIs) are pursuant to LAMC Section 12.37 I of Chapter 1 or LAMC Section 10.1.10. (Waiver and Appeals) of Chapter 1A as applicable.

- WDIs for by-right projects can only be appealed by the Property Owner.
- If the WDI is part of a larger discretionary project, the applicant may appeal pursuant to the procedures which govern the main entitlement.

[VESTING] TENTATIVE TRACT MAP

Procedures for appeals of [Vesting] Tentative Tract Maps are pursuant LAMC Section 13B.7.3.G. of Chapter 1A.

- Appeals must be filed within 10 days of the date of the written determination of the decision-maker.

NUISANCE ABATEMENT / REVOCATIONS

Appeal procedures for Nuisance Abatement/Revocations are pursuant to LAMC Section 13B.6.2.G. of Chapter 1A. Nuisance Abatement/Revocations cases are only appealable to the City Council.

Appeal Fee

- ☐ *Applicant (Owner/Operator).* The fee charged shall be in accordance with the LAMC Section 19.01 B.1(a) of Chapter 1 or LAMC Section 15.1.1.F.1.a. (Appeal Fees) of Chapter 1A as applicable.

  For appeals filed by the property owner and/or business owner/operator, or any individuals/agents/representatives/associates affiliated with the property and business, who files the appeal on behalf of the property owner and/or business owner/operator, appeal application fees listed under LAMC Section 19.01 B.1(a) of Chapter 1 shall be paid, at the time the appeal application is submitted, or the appeal application will not be accepted.

- ☐ *Aggrieved Party.* The fee charged shall be in accordance with the LAMC Section 19.01 B.1(b) of Chapter 1 or LAMC Section 15.1.1.F.1.b. (Appeal Fees) of Chapter 1A as applicable.

Channel Law Group, LLP

8383 Wilshire Blvd.
Suite 750
Beverly Hills, CA 90211

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

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

*ALSO Admitted in Texas

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

April 30, 2026

VIA ELECTRONIC UPLOAD

Los Angeles City Planning Commission
c/o Department of City Planning
200 N. Spring Street, Room 525
Los Angeles, CA 90012

Re: Justification for Appeal of Vesting Tentative Tract Map No. VTT-84453 (Riverwalk at Studio City) — 12501–12665 W. Ventura Boulevard; CEQA Case No. ENV-2025-5698-SE

Dear Honorable Members of the City Planning Commission:

This firm represents Studio City for Safe Development ("Appellant" or "Association"), an unincorporated association of community members whose mission is to protect public safety and the natural environment in and around Studio City. This letter sets forth the Association's justifications for appeal of the Advisory Agency's April 15, 2026 approval of Vesting Tentative Tract Map No. VTT-84453 (the "VTT") for the proposed mixed-use development at 12501–12665 West Ventura Boulevard, also known as the "Riverwalk at Studio City" project (the "Project"). The Project proposes the merger and re-subdivision of four legal lots into two master ground lots, three residential airspace lots, five commercial airspace lots, and eight parking airspace lots in order to facilitate construction of three seven-story buildings comprising 814 residential dwelling units and approximately 75,968 square feet of commercial space, together with a haul route approval for the export of approximately 521,000 cubic yards of dirt over 200 days at 144 truck trips per day.

The Association brings this appeal because it and its members have a direct and substantial beneficial interest in ensuring that the City of Los Angeles ("City") complies with the Subdivision Map Act, the California Environmental Quality Act ("CEQA"), and other laws relating to environmental protection and public safety. The Association's members live, work, and recreate in the immediate vicinity of the Project Site and will be directly and adversely affected by the

Project's environmental impacts and by the public-safety hazards the Project will create or exacerbate, including impacts to sensitive wildlife, the loss of mature tree canopy along the Los Angeles River corridor, light pollution intruding into adjacent designated open space, and the increased risk of catastrophic harm during a wildfire evacuation in a Very High Fire Hazard Severity Zone.

As set forth below, the Advisory Agency's findings under Government Code section 66474 are not supported by substantial evidence in the record. Specifically, the Advisory Agency cannot lawfully find on this record that (i) the proposed map is consistent with applicable General and Specific Plans (subdivisions (a)–(b)); (ii) the design of the subdivision is not likely to cause substantial environmental damage or substantially and avoidably injure fish or wildlife or their habitat (subdivision (e)); or (iii) the design of the subdivision is not likely to cause serious public health problems (subdivision (f)). The VTT must be denied. At a minimum, the approval must be set aside because the Advisory Agency failed to make the findings required by law and lacks substantial evidence to support them.

I. THE SUBDIVISION MAP ACT REQUIRES INDEPENDENT ENVIRONMENTAL REVIEW THAT IS SEPARATE FROM AND NOT EXCUSED BY THE CITY'S CEQA EXEMPTION DETERMINATION

The Advisory Agency determined that the Project is statutorily exempt from CEQA pursuant to Public Resources Code section 21080.66. Even assuming arguendo that this exemption determination is correct (and the Association does not concede that it is), the City's CEQA exemption finding does not relieve the Advisory Agency of its independent statutory duty to make the environmental and public-health findings required under the Subdivision Map Act.

Government Code section 66474, subdivision (e), independently requires that an advisory agency *deny* a tentative or vesting tentative tract map if it finds that the design of the subdivision or the proposed improvements *are likely to cause substantial environmental damage or substantially and avoidably injure fish or wildlife or their habitat*. Subdivision (f) of the same section likewise requires denial if the agency finds the design or improvements are *likely to cause serious public health problems*. These statutory findings exist independently of, and in addition to, the obligations imposed by CEQA.

The California Court of Appeal has expressly held that section 66474(e) creates an environmental review obligation that is **separate from and independent of CEQA**. In *Topanga Ass'n for a Scenic Cmty. v. County of L.A.* (1989) 214 Cal.App.3d 1348, the court rejected the argument that satisfaction of CEQA disposes of the duty to make the section 66474(e) finding, holding: "Appellants argue that elimination of their CEQA causes of action does not foreclose an environmental challenge to the approval of the project because the Subdivision Map Act, in Government Code section 66474, subdivision (e), provides for environmental impact review

separate from and independent of the requirements [of CEQA]. We agree." *Id.* at 1355. The court reaffirmed the long-standing position of the California Attorney General that "the finding required by section 66474, subdivision (e) is in addition to the requirements for the preparation of an environmental impact report or a negative declaration pursuant to the CEQA." *Id.* at 1355–1356, quoting 59 Ops.Cal.Atty.Gen. 129, 130 (1976).

The City's reliance on a statutory exemption from CEQA under Public Resources Code section 21080.66 therefore does not, and cannot, satisfy the Subdivision Map Act's independent requirement that the Advisory Agency assess whether the design of the subdivision will cause substantial environmental damage or serious public health problems. Indeed, the section 21080.66 exemption itself requires, as a condition precedent, that the Project comply with all applicable state and local building and safety standards — including the State Minimum Fire Safe Regulations discussed in Section IV below. The administrative record does not demonstrate that the Project so complies, thereby invalidating the City's reliance on the CEQA exemption as a matter of law. In any event, the cursory, conclusory "findings" recited at page 20 of the April 15, 2026 Letter of Determination ("LOD") fall far short of the substantial-evidence standard for the section 66474 findings.

The Advisory Agency's approach effectively collapses two independent statutory schemes into one, treating a claimed CEQA exemption as a substitute for the findings required under Government Code section 66474. That is legal error. The Subdivision Map Act imposes a separate, mandatory duty to evaluate environmental damage and public health risks. That duty exists regardless of whether CEQA applies, and it cannot be avoided through reliance on a statutory exemption.

II. THE FINDINGS UNDER GOVERNMENT CODE SECTION 66474, SUBDIVISIONS (a) AND (b), ARE NOT SUPPORTED BY SUBSTANTIAL EVIDENCE BECAUSE THE PROJECT IS INCONSISTENT WITH THE GENERAL PLAN SAFETY ELEMENT

The Subdivision Map Act mandates denial of a tract map that is not consistent with applicable general and specific plans. Gov. Code § 66474, subds. (a)–(b). The General Plan includes the City's Safety Element, which is governed by Government Code section 65302, subdivision (g).

Effective January 1, 2022, Assembly Bill 747 (2019) and Assembly Bill 1409 (2021) added Government Code section 65302.15, which requires that the safety element of every local jurisdiction's general plan be reviewed and updated *to identify evacuation routes and their capacity, safety, and viability and evacuation locations under a range of emergency scenarios*. The Riverwalk Project Site is located in a Very High Fire Hazard Severity Zone ("VHFHSZ"). LOD, p. 4 ("This property is located in a Very High Fire Hazard Severity Zone."); ZIMAS,

Environmental and Additional Information panels for APNs 2375-018-008, 013, 018, 019. Ventura Boulevard — the Project's principal frontage and the only meaningful corridor for ingress and egress for the 814 proposed dwelling units — is also the primary evacuation route for the adjacent hillside neighborhoods to the south, all of which are likewise designated VHFHSZ.

Despite this critical factual context, the administrative record contains no analysis whatsoever — by the Advisory Agency, by the applicant, or by the Los Angeles Fire Department — of whether Ventura Boulevard can safely accommodate the combined evacuation load of (i) existing residents already evacuating onto Ventura Boulevard, (ii) the additional residents and commercial occupants generated by the Project, and (iii) LAFD emergency response and staging operations during a wildfire event. The Project's Vesting Tentative Tract findings address only on-site driveway consolidation and signalization (Findings, pp. 21–22); they do not address corridor-level evacuation capacity. Reliance on California Fire Code requirements does not cure this deficiency, because those standards primarily govern emergency vehicle *ingress*, not civilian *egress* under mass-evacuation conditions.

This is not a minor omission in the administrative record. It is the complete absence of analysis of a known life-safety constraint in a Very High Fire Hazard Severity Zone. The City cannot lawfully approve a substantial increase in population along a constrained evacuation corridor without first demonstrating—based on substantial evidence—that evacuation remains feasible. No such evidence exists here.

Approving substantial increases in residential density along a known wildfire evacuation corridor, without any demonstrated analysis that safe egress remains feasible, creates a facial inconsistency with the Safety Element. Gov. Code § 65302, subd. (g); § 65302.15. The Advisory Agency's bare consistency finding (LOD, pp. 17–18; Findings, pp. 1–8) does not engage with the Safety Element at all and therefore fails the substantial-evidence standard. *Topanga Ass'n for a Scenic Cmty. v. County of L.A.* (1974) 11 Cal.3d 506, 515 (findings must "bridge the analytic gap between the raw evidence and the ultimate decision or order"). Because the Project is not consistent with the General Plan Safety Element, the consistency findings under Government Code section 66474, *subdivisions (a) and (b), fail as a matter of law.*

III. THE FINDING THAT THE PROJECT WILL NOT CAUSE SUBSTANTIAL ENVIRONMENTAL DAMAGE OR SUBSTANTIALLY INJURE WILDLIFE OR THEIR HABITAT IS NOT SUPPORTED BY SUBSTANTIAL EVIDENCE (Govt. Code § 66474(e))

A. The City's two-sentence 'finding" is conclusory and is contradicted by the City's own ZIMAS data and by site-specific biological evidence in the record.

Findings supporting a discretionary land-use approval must "bridge the analytic gap between the raw evidence and the ultimate decision or order" so as to enable meaningful judicial and public review. *Topanga*, 11 Cal.3d at 515. Conclusory findings that merely parrot the language of the governing statute are legally inadequate. *Ibid.* The Advisory Agency's entire "finding" under Government Code section 66474(e) consists of two sentences, in their entirety:

> "The project site is currently developed with commercial buildings and surface parking. The project site, as well as the surrounding area, is developed with structures and no identified fish, wildlife, or established habitat is located on-site. It has been determined that the project and the design of the subdivision and proposed improvements will not cause substantial environmental damage or injury to wildlife or their habitat."
>
> LOD, p. 20. That is the entire analysis.

The Advisory Agency's foundational premise — that the Project Site contains no wildlife or wildlife habitat because it is currently "developed" — is **directly contradicted by the City's own ZIMAS data**. The City's ZIMAS report for the Project Site shows that the Site is flagged "Yes" for the **300-Foot Habitat Buffer**. As ZIMAS itself explains, the 300-Foot Habitat Buffer flag is applied to parcels "within 300 feet of suitable habitat to support special-status species," and triggers Mitigation Measure 4.1-1(a) of the Housing Element Program EIR, which **requires the applicant to conduct a biological resource assessment**. *See* Housing Element CEQA Checklist Form (CP-4089) and Instructions (CP-4091). The City has neither acknowledged this designation nor required any biological resource assessment, even though the City's own GIS data identifies suitable special-status species habitat within 300 feet of the Project Site.

Two sentences of unreasoned ipse dixit cannot, as a matter of law, constitute substantial evidence in support of the section 66474(e) finding when the City's own data identify the site as being within a designated buffer of special-status species habitat. The Advisory Agency identifies no biological survey, no consultation with the California Department of Fish and Wildlife, no acoustic or emergence survey, no review of the California Natural Diversity Database, and no analysis whatsoever of the Project Site's habitat function.

B. Substantial evidence in the record demonstrates that the Project will remove a large number of mature trees that provide habitat for the western yellow bat, a California Species of Special Concern.

The Tree Report prepared by Carlberg Associates, dated July 3, 2025, inventories 275 trees on and immediately adjacent to the Project Site. The Project proposes to remove 240 of the 244 onsite, non-protected private property trees, plus three additional street trees. Among the trees proposed for removal are **approximately 93 palm trees**, including 22 onsite Mexican fan palms (*Washingtonia robusta*), 8 king palms (*Archontophoenix cunninghamiana*), 19 queen palms (*Syagrus romanzoffiana*), and 44 pygmy date palms (*Phoenix roebelenii*). *See* Carlberg Associates, Protected Tree Report (July 3, 2025), Tables 2, 5, and 8.

These palms are located within feet of, and immediately across Valleyheart Drive from, the Los Angeles River. The same palm species, in essentially identical riparian conditions, exist directly across the Los Angeles River on the property formerly occupied by the Weddington Golf & Tennis facility, which has recently been redeveloped by the Harvard-Westlake School as the Harvard-Westlake River Park Project. The Draft Environmental Impact Report ("DEIR") prepared for that immediately adjacent project, and the comments thereon prepared by Senior Biologist Scott Cashen, M.S. (a 29-year California environmental biologist who has served as a biological resources expert on more than 150 projects in California), establish — by substantial evidence in the form of expert biological opinion — that the Mexican fan palms on the Harvard-Westlake site provide suitable roosting habitat for the **western yellow bat** (*Lasiurus xanthinus*), a California Species of Special Concern. As Mr. Cashen explained:

> "The western yellow bat (*Lasiurus xanthinus*) is a California Species of Special Concern that appears to roost exclusively in the skirts of palm trees located near open water or wetlands. The photographs provided in the tree report prepared by the Applicant's arborist depict numerous palms at the Project site with skirts suitable for roosting bats."

See **Exhibit A** - Letter from Scott Cashen, M.S., Senior Biologist, to Jamie T. Hall regarding Comments on the Draft EIR for the Harvard-Westlake River Park Project (May 8, 2022), p. 1. The City's own DEIR for the Harvard-Westlake project likewise concluded that the western yellow bat "has moderate potential to roost and forage" within the biological study area on that site, and that "[t]he Biological Study Area supports a number of palm trees that would be suitable roosting habitat for this species. Additionally, the adjacent Los Angeles River may provide suitable foraging habitat above the river." *Id.*, quoting Harvard-Westlake DEIR, p. IV.C-27. Loss of suitable roosting habitat is among the principal threats to the western yellow bat population, and yellow bats are deep sleepers that "feel safe in palm fronds and generally will not flush at signs of danger" — meaning they are "frequently killed or injured when palm trees are felled." Cashen Letter, p. 3.

There is therefore substantial evidence — including the City's own prior CEQA findings on the property directly across the Los Angeles River — that the same species of palm trees, growing in essentially identical riparian conditions on the Riverwalk Project Site, very likely provide roosting habitat for the western yellow bat. The Project proposes to fell virtually every palm tree on the site. The wholesale removal of the Project Site's palm canopy will, on substantial evidence, result in direct mortality of, and the permanent loss of habitat for, a California Species of Special Concern. The City's flat assertion that "no identified fish, wildlife, or established habitat is located on-site" is squarely refuted by this record. The City made no effort whatsoever to determine the presence, abundance, or distribution of yellow bats or other special-status species at the Project Site; conducted no acoustic, emergence, or roost survey; consulted no qualified biologist; ignored its own ZIMAS "300-Foot Habitat Buffer" designation; and ignored its own findings on the immediately adjacent Harvard-Westlake property. The two-sentence "finding" in the LOD is exactly the kind of "mere conclusion" that *Topanga* forbids. The City's conclusion that no habitat exists on-site is not merely unsupported—it is directly contradicted by the record. This evidence alone is sufficient to require denial under Government Code section 66474(e).

C. The Project will displace nesting and foraging birds previously displaced by the Harvard-Westlake redevelopment, compounding cumulative habitat loss along the Los Angeles River corridor.

The recent Harvard-Westlake River Park redevelopment of the former Weddington Golf & Tennis facility involved the removal of a substantial number of mature trees from the property directly across the Los Angeles River from the Project Site. The avifauna of the Los Angeles River corridor in this segment includes more than 70 documented bird species, including resident, migratory, and special-status species. Cashen Letter, pp. 5–6 and footnote 20. As a matter of basic ecological principle, birds that lost their nesting and foraging habitat at the former Weddington site relocated to the closest available suitable habitat — which includes the mature canopy on the Project Site, located across the river. The Project's wholesale removal of approximately 240 onsite trees will now displace those same individuals (and their progeny) a second time. "It is a fallacy to imagine that wildlife at a development site will simply move to a new area after development. This is false because suitable surrounding habitat will already be occupied. Wildlife numbers are reduced each time habitat is lost through development." *See, generally, Save Agoura Cornell Knoll v. City of Agoura Hills* (2020) 46 Cal.App.5th 665, 701 (replacement trees do not mitigate loss of established tree habitat). The Advisory Agency made no analysis of these cumulative habitat impacts.

D. The Project Site is immediately adjacent to designated Open Space and the Los Angeles River, and the Project will introduce significant new light pollution into that adjacent open space corridor.

The Project Site is bordered on the north by Valleyheart Drive and, immediately beyond that, by parcels designated Open Space on the General Plan Land Use Map and zoned OS-1XL-RIO (the Los Angeles County Flood Control District parcels along the Los Angeles River), which form part of the City-designated River Implementation Overlay District ("RIO"). Findings, p. 19. The LOD itself imposes Bureau of Street Lighting Condition No. 13, which requires the construction of **ten new street lights along Valleyheart Drive** — directly on the boundary between the Project and the LA River Open Space corridor — and the relocation and upgrade of one street light on Whitsett Avenue and twelve street lights on Ventura Boulevard. LOD, p. 15 (Condition S-3.(c)(1)); LOD, p. 18 (Finding (b)). This new lighting infrastructure will introduce substantial new artificial light into the LA River Open Space corridor, which provides nocturnal foraging and movement habitat for bats (including the western yellow bat), migratory birds, and other species. Light pollution is a well-documented stressor on nocturnal wildlife. The Advisory Agency made no analysis of this potentially significant impact on adjacent open space and wildlife habitat. The two-sentence finding under section 66474(e) does not even acknowledge the Site's immediate adjacency to designated Open Space and the Los Angeles River corridor.

For each of the foregoing independent reasons, and for the cumulative reasons set forth in Section V below, the Advisory Agency's finding under Government Code section 66474(e) is not supported by substantial evidence and the VTT must be denied.

IV. THE FINDING THAT THE PROJECT WILL NOT CAUSE SERIOUS PUBLIC HEALTH PROBLEMS IS NOT SUPPORTED BY SUBSTANTIAL EVIDENCE BECAUSE THE PROJECT IS LOCATED IN A VERY HIGH FIRE HAZARD SEVERITY ZONE AND DOES NOT COMPLY WITH THE STATE MINIMUM FIRE SAFE REGULATIONS (Govt. Code § 66474(f))

A. The Project Site is located in a Very High Fire Hazard Severity Zone.

There is no dispute that the Project Site is located in a Very High Fire Hazard Severity Zone. The LOD itself acknowledges this fact, expressly noting that "This property is located in a Very High Fire Hazard Severity Zone." LOD, p. 4. The Advisory Agency's own finding under section 66474(c) likewise acknowledges that "[t]he site is located within a high fire hazard severity zone." LOD, p. 19. The City's ZIMAS report for the Site also confirms the VHFHSZ designation. The applicant's findings document also confirms the Site is within a VHFHSZ. Riverwalk at Studio City, VTT-84453 Findings (Sept. 19, 2025), p. 18.

B. The Project is subject to, and does not comply with, the State Minimum Fire Safe Regulations.

In 2018, the Legislature enacted Senate Bill 901, which mandated the expansion of California's regulations regarding minimum fire safety standards to apply within all VHFHSZs, including those in Local Responsibility Areas such as the City of Los Angeles. *See* Gov. Code § 51177, subd. (i). The Board of Forestry and Fire Protection adopted implementing regulations, codified at California Code of Regulations, title 14, sections 1270.00 *et seq.* (the "State Minimum Fire Safe Regulations" or "Regulations"). The Regulations were adopted, after extensive consultation with fire professionals and community members, to protect life and limb during wildfire events.

Section 1270.03(a) provides that the Regulations apply to "the perimeters and access to all residential, commercial, and industrial Building construction . . . approved after July 1, 2021 within the [VHFHSZ]." Section 1270.03(c) further provides that the affected activities include the "permitting or approval of new parcels, excluding lot line adjustments as specified in Government Code (GC) section 66412(d)." Cal. Code Regs. tit. 14 § 1270.03(c)(1). The Project plainly involves both the construction of new residential and commercial buildings within a VHFHSZ approved after July 1, 2021, and the "permitting or approval of new parcels" within the meaning of section 1270.03(c)(1). The Regulations therefore apply.

Article 5 of the Regulations addresses Building Siting, Setbacks and Fuel Modification, and is intended "to reduce the intensity of a Wildfire, reducing the volume and density of flammable vegetation around Development through strategic fuel modification, parcel siting and Building setbacks . . . [to] provide for increased safety for emergency fire equipment, including evacuating civilians, and a point of attack or defense from a Wildfire." Cal. Code Regs. tit. 14 § 1276.00. Section 1276.01 establishes the operative setback requirement:

> "(a) All parcels shall provide a **minimum thirty (30) foot setback for all Buildings from all property lines** and/or the center of a Road, except as provided for in subsection (b).
>
> (b) A reduction in the minimum setback shall be based upon practical reasons . . . **and shall provide for an alternative method to reduce Structure-to-Structure ignition** by incorporating features such as, but not limited to: (1) non-combustible block walls or fences; or (2) non-combustible material extending five (5) feet horizontally from the furthest extent of the Building; or (3) hardscape landscaping; or (4) a reduction of exposed windows on the side of the Structure with a less than thirty (30) foot setback; or (5) the most protective requirements in the California Building Code, California Code of Regulations Title 24, Part 2, Chapter 7A, as required by the Local Jurisdiction."

Cal. Code Regs. tit. 14 § 1276.01(a)–(b) (emphasis added).

The Vesting Tentative Tract Map approved by the Advisory Agency plainly violates the State Minimum Fire Safe Regulations. The Tract Map and the applicant's own findings document confirm that the Project is being designed with: **(i)** a 1.5-foot front yard setback along Ventura Boulevard; **(ii)** a 1.5-foot side yard setback along Whitsett Avenue; and **(iii)** a 1.5-foot rear yard setback along Valleyheart Drive (in lieu of the otherwise-required 19-foot setback). *See* Vesting Tentative Tract Map No. 84453 (stamp-dated October 14, 2025), Sheet 1 ("Notes"); Riverwalk at Studio City, VTT-84453 Findings (Sept. 19, 2025), pp. 9–10, 20. These setbacks are approximately twenty times smaller than the minimum required by state law. That is not a marginal deviation—it is a wholesale failure to comply with mandatory life-safety standards.

Nor has the Project been designed or conditioned to provide any of the alternative measures to reduce structure-to-structure ignition required by section 1276.01(b). The Tract Map does not show any non-combustible block walls or fences along the property lines, does not provide for the requisite five-foot non-combustible material zone extending from the building, does not substitute hardscape landscaping for vegetation in the setback areas, does not reduce exposed windows on the sides of the structures with the less-than-30-foot setback, and does not commit the project to the most protective requirements of California Building Code Title 24, Part 2, Chapter 7A. The Conditions of Approval set forth in the LOD likewise contain no condition that would bring the Project into compliance with section 1276.01(b). The City cannot approve a subdivision that fails to meet mandatory state fire safety regulations and simultaneously conclude that the Project will not create a serious public health problem.

C. Approval of a subdivision in a VHFHSZ that does not comply with state-mandated fire safety setbacks creates a serious public health problem within the meaning of Government Code section 66474(f).

The State Minimum Fire Safe Regulations were adopted, after extensive consultation with fire professionals, expressly to protect life and limb during wildfire events. Approval of this subdivision creates a foreseeable and significant risk to human life and is, by definition, *likely to cause serious public health problems* within the meaning of Government Code section 66474(f). The very purpose of the state regulations is to mitigate the catastrophic loss of life and property that has, in recent years, attended large wildfire events in California's wildland-urban interface zones.

The Advisory Agency's entire finding under section 66474(f) reads: "There appears to be no potential public health problems caused by the design or improvement of the proposed subdivision. The development is required to be connected to the City's sanitary sewer system . . . ." LOD, p. 20. The finding is wholly limited to wastewater discharge to the Hyperion Treatment Plant. It contains no analysis whatsoever of the Project's location in a VHFHSZ, no analysis of

compliance with the State Minimum Fire Safe Regulations, no analysis of evacuation capacity (notwithstanding the Project's introduction of more than 1,600 additional residents and an undetermined number of commercial occupants served by a single-corridor evacuation route), no analysis of structure-to-structure ignition risk in light of the 1.5-foot setbacks, and no analysis of public-health impacts associated with wildfire smoke or the increased risk of human-caused wildfire ignitions associated with the introduction of substantial new population in close proximity to the wildland-urban interface. *See, e.g., People ex rel. Bonta v. County of Lake* (2024) 105 Cal.App.5th 1222, 1231; *League to Save Lake Tahoe Mountain Area v. County of Placer* (2022) 75 Cal.App.5th 63, 136 ("[d]eveloping new homes and stores in a very high fire hazard area risks exacerbating the hazard").

D. The City has no analysis of evacuation capacity, and the Project's reliance on Ventura Boulevard as the sole meaningful evacuation corridor independently creates a serious public health problem.

The administrative record contains no corridor-level evacuation capacity analysis whatsoever — a critical and conspicuous evidentiary gap given Ventura Boulevard's role as the primary wildfire evacuation route for the surrounding VHFHSZ neighborhoods. As discussed in Section II above, Ventura Boulevard already serves as the primary wildfire evacuation route for the existing hillside neighborhoods south of the Project Site, all of which are also designated VHFHSZ. The Project will introduce more than 1,600 additional residents (assuming an average of two persons per dwelling unit), an undetermined number of commercial customers and employees, and substantial new vehicle trips onto this same constrained corridor. The administrative record contains no analysis of corridor-level evacuation capacity, no analysis of intersection level-of-service under evacuation conditions, no analysis of Ventura Boulevard's ability to simultaneously accommodate civilian evacuation and LAFD emergency response staging, and no analysis of the limited number of secondary emergency egress routes (effectively limited to Whitsett Avenue and Coldwater Canyon Avenue, both of which are themselves constrained two-lane corridors that quickly enter VHFHSZ hillside terrain).

Reliance on the California Fire Code is no answer. As discussed in Section II, those standards govern emergency vehicle *ingress*, not civilian *egress* under mass-evacuation conditions. A fire-access compliance determination does not — and cannot — substitute for a substantial-evidence analysis of whether the corridor can safely accommodate evacuation of its existing and future population under foreseeable wildfire conditions. The absence of this analysis is itself substantial evidence that the finding cannot be made. The Advisory Agency's finding is not supported by substantial evidence and fails as a matter of law.

V. THE CUMULATIVE IMPACTS OF THE PROJECT, IN COMBINATION WITH OTHER ONGOING AND REASONABLY FORESEEABLE PROJECTS ALONG THE VENTURA BOULEVARD CORRIDOR, INDEPENDENTLY ESTABLISH A LIKELIHOOD OF SERIOUS PUBLIC HEALTH PROBLEMS

These projects are not speculative. They are approved, under construction, or actively pursued. Even if the Riverwalk Project alone did not establish a likelihood of serious public health problems (and as set forth above, it plainly does), the cumulative impact of the Project in combination with other ongoing and reasonably foreseeable projects in the immediate vicinity demonstrates such a likelihood. The City has an obligation to consider cumulative impacts in making its findings under Government Code section 66474; even where individual projects might be approved on their own terms, the City may not approve a project that, in combination with other projects, creates a foreseeable public-safety failure. The following projects are ongoing or reasonably foreseeable in the immediate Project vicinity and contribute to cumulative impacts on the Ventura Boulevard corridor and on the LA River Open Space corridor:

- **The Sportsmen's Lodge Redevelopment** (Case No. CPC-2021-7012-DB-MCUP-WDI-SPP-SPR-VHCA), at 12805–12835 W. Ventura Boulevard and 4218–4230 N. Coldwater Canyon Avenue. The City Council approved the project on April 3, 2024, on a 13–1 vote. It comprises 520 residential units, 45,945 square feet of commercial space, 1,385 parking spaces, and three buildings up to approximately 94–97 feet in height, with approximately 430,000 cubic yards of excavation. Construction overlaps with the Riverwalk Project. The Sportsmen's Lodge site shares the same C1.5-1VL strip and the same single-corridor evacuation constraint.

- **The Harvard-Westlake River Park Project** (City Council approved November 14, 2023), located directly across the Los Angeles River at 4047, 4141, and 4155 N. Whitsett Avenue and 12506, 12600, and 12630 W. Valley Spring Lane. The project includes a 50-meter pool, an approximately 80,249-square-foot gymnasium, two athletic fields, eight tennis courts, and 403 parking spaces. The Harvard-Westlake project removed substantial mature tree canopy from the former Weddington Golf & Tennis facility, displacing avifauna onto the Riverwalk Project Site (among other adjacent sites), as discussed in Section III(C) above.

- **The Sunswept Place Project** at 12544–12582 Ventura Boulevard and 4041–4073 Sunswept Drive, on the south side of Ventura Boulevard directly across from a portion of the Riverwalk Project Site. The pending plan of record provides for 27 fourth-level condominium units (with 5 very-low-income units), 17,400 square feet of commercial space, and 154 parking spaces. Public testimony at the April 2026 hearing referenced a

substantially larger version of this project (177 units, 31,743 square feet of commercial, and a 130-child daycare); to the extent that larger project is filed, cumulative impacts increase materially.

- **The 12434 Moorpark Street Project** (Executive Directive 1 application), 102 two-bedroom units in a five-story building with *no on-site parking*, filed late 2024 and pursuing density bonus incentives.

- **The 12750 Moorpark Street Project** (Executive Directive 1 application), 51 affordable units in a five-story building with *no on-site parking*, application filed September 2023, pursuing density bonus incentives.

Critically, all five of these cumulative projects (along with the Riverwalk Project itself) lie within less than approximately 0.7 miles of one another along the same Ventura Boulevard corridor, concentrating the combined population, vehicular, excavation, and evacuation impacts within a single localized segment of Studio City. Taken together, these projects propose more than 1,500 additional residential dwelling units within several blocks of the Riverwalk Project Site, plus substantial new commercial floor area and substantial new excavation and haul activity. They will be served, in the aggregate, by the same constrained Ventura Boulevard corridor that already serves as the primary wildfire evacuation route for the adjacent hillside VHFHSZ neighborhoods. Several of the projects (notably the Moorpark ED1 projects) contain no on-site parking, increasing on-street parking demand and further constraining the capacity of the corridor and the side streets to accommodate evacuation. None of these cumulative impacts is acknowledged anywhere in the Advisory Agency's section 66474(f) finding, which addresses only Hyperion Treatment Plant capacity. The Advisory Agency's failure to consider cumulative impacts in making the section 66474(f) finding independently requires reversal.

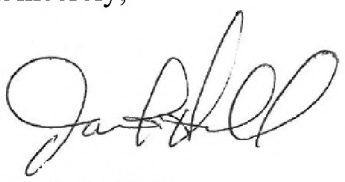
VI. CONCLUSION

For all of the reasons set forth above, the approval of VTT-84453 is unlawful. The VTT must be denied. At a minimum, the approval must be set aside and remanded to the Advisory Agency with directions to (i) make adequate, substantial-evidence-based findings under Government Code section 66474, subdivisions (a)–(b), (e), and (f), independent of any CEQA exemption determination; (ii) require the applicant to conduct the biological resource assessment required by Mitigation Measure 4.1-1(a) of the Housing Element Program EIR in light of the Site's "300-Foot Habitat Buffer" designation; (iii) require the City and the applicant to evaluate and demonstrate corridor-level evacuation capacity along Ventura Boulevard under foreseeable wildfire conditions, both for this Project alone and cumulatively with other ongoing and reasonably foreseeable Ventura Boulevard projects; and (iv) require the Project to be designed and conditioned to comply with the State Minimum Fire Safe Regulations, Cal. Code Regs. tit. 14 §§

1270.00 *et seq.*, before any further approval may issue. The Advisory Agency's findings under Government Code section 66474, subdivisions (a)–(b), (e), and (f), are not supported by substantial evidence, cannot be lawfully made on this record, and require reversal.

Appellant reserves the right to supplement the bases for this appeal at or before any hearing on the matter. Thank you for your consideration.

Sincerely,



Jamie T. Hall
Attorney for Studio City for Safe Development

Exhibit A

May 8, 2022

Mr. Jamie T. Hall
Channel Law Group, LLP
8383 Wilshire Blvd., Suite 750
Beverly Hills, CA 90211

Subject: Comments on the Draft Environmental Impact Report for the Harvard-Westlake River Park Project

Dear Mr. Hall:

This letter contains my comments on the Draft Environmental Impact Report ("DEIR") prepared by the City of Los Angeles ("City") for the Harvard-Westlake River Park Project ("Project"). The Project Applicant, Harvard-Westlake School ("Applicant") proposes construction and operation of an athletic and recreational facility on a 16.1-acre parcel owned by the Applicant, and a 1.1-acre parcel leased from the Los Angeles County Flood Control District, in the community of Studio City. Although the majority of the Project site is currently occupied by a private golf course and tennis facility, some components of the Project extend into the Zev Yaroslavsky Los Angeles River Greenway ("Zev Greenway").

I am an environmental biologist with 29 years of professional experience in wildlife biology and natural resources management. I have served as a biological resources expert for over 150 projects in California. My experience and scope of work in this regard has included assisting various clients with evaluations of biological resource issues; preparation and peer review of environmental compliance documents prepared pursuant to the California Environmental Quality Act ("CEQA") and the National Environmental Policy Act ("NEPA"); and preparation of written comments that address deficiencies with CEQA and NEPA documents. My work has included written and oral testimony for the California Energy Commission, California Public Utilities Commission, and Federal courts. My educational background includes a B.S. in Resource Management from the University of California at Berkeley, and a M.S. in Wildlife and Fisheries Science from the Pennsylvania State University. A copy of my curriculum vitae is attached hereto.

The comments herein are based on my review of the environmental documents prepared for the Project, a review of scientific literature pertaining to biological resources known to occur in the Project area, consultations with other biological resource experts, and the knowledge and experience I have acquired during my 29-year career in the field of natural resources management.

- The DEIR does not adequately disclose, analyze, or mitigate impacts to the western yellow bat (and potentially other special-status bat species).

- The DEIR fails to provide an accurate assessment of impacts to the California brittlebush scrub community (a sensitive natural community). In addition, the DEIR impermissibly defers critical components of the proposed mitigation.

- The DEIR fails to disclose, analyze, or provide mitigation for the avian collision hazard associated with Project design features (large expanses of glass).

ENVIRONMENTAL SETTING

The DEIR Fails to Establish the Environmental Setting with Respect to the Western Yellow Bat

The western yellow bat (*Lasiurus xanthinus*) is a California Species of Special Concern that appears to roost exclusively in the skirts of palm trees located near open water or wetlands.[1] The photographs provided in the tree report prepared by the Applicant's arborist depict numerous palms at the Project site with skirts suitable for roosting bats.[2] According to the DEIR:

> "Western yellow bat has moderate potential to roost and forage in the Biological Study Area. The Biological Study Area supports a number of palm trees that would be suitable roosting habitat for this species. Additionally, the adjacent Los Angeles River may provide suitable foraging habitat above the river and near the southwestern boundary of the Biological Study Area."[3]

Although the DEIR acknowledges there is potential for western yellow bats to occur at the Project site, there was no effort to determine presence, abundance, and distribution of the species at the site, nor were there any attempts to determine how many of the site's 174 palm trees contain bat roosts. The DEIR's failure to establish the environmental setting (with respect to bats) precludes informed decision making and public participation because it precludes understanding of the severity of the Project's impacts on the western yellow bat population. For example, without data on the number of active bat roosts at the Project site, the public (and City) have no idea whether the Project would affect 1 yellow bat, 100 yellow bats, or no yellow bats. This lack of information not only has implications on the public's ability to understand the Project's impacts, but also the City's ability to effectively evaluate the significance threshold used in the DEIR (i.e., "*[w]ould the Project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species...*"). Whereas loss of one active bat roost from the Project site would not have a substantial adverse effect on the western yellow bat population, the loss of 50 active roosts (for example) would have severe, and potentially unmitigable impacts on the population. To properly disclose, analyze, and mitigate the Project's impacts on bats, the City must conduct surveys to determine the presence, abundance, and distribution of active roosts at the site, and these data must be released to the public in a recirculated DEIR.

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[1] Pierson ED, Rainey WE. 1998. Western yellow bat, *Lasiurus xanthinus*. In: Bolster BC, ed. Terrestrial Mammal Species of Special Concern in California. pp. 50 and 51. *See also* Marty J, Unnasch R. 2015. Western Yellow Bat (*Lasiurus xanthinus*) (WYBA) Basic Conceptual Ecological Model for the Lower Colorado River. Submitted to the Bureau of Reclamation, Boulder City, Nevada, by Sound Science, LLC, Boise, Idaho.

[2] DEIR, Appendix A (Arborist Report) to Appendix D (Biological Resources Technical Report).

[3] DEIR, p. IV.C-27.

PROJECT IMPACTS

The DEIR Fails to Adequately Disclose and Analyze Project Impacts to the Western Yellow Bat

Direct Impacts

The DEIR's analysis of direct impacts to the western yellow bat is limited to the statement that: "[c]onstruction of the Project could result in potentially significant direct impacts to this bat species if tree removal commences during the maternity roosting season (generally March 1 through September 30)."[4]

Direct impacts to the western yellow bat (and other bat species) are not limited tree removal during the maternity roosting season. Some western yellow bats are year-round residents in southern California.[5] These bats may use trees at the Project site as day roosts, night roosts, or maternity roosts.[6] Consequently, western yellow bats may occur in trees (especially the palms) at the Project site at any time of day (or night), on any day of the year.

Yellow bats are deep sleepers.[7] Even when fully awake, they feel safe in palm fronds and generally will not flush at signs of danger.[8] As a result, yellow bats are frequently killed or injured when palm trees are felled.[9] Because bats are a prey species that has few behavioral defenses against predation, they rely on concealment (at roosts) to avoid predation by diurnal predators. Therefore, even if bats flush from a tree as it is being felled, most of these individuals are likely to die due to predation or exposure. The DEIR fails to analyze impacts to, or incorporate mitigation for, bats that may occupy trees at the Project site during the non-maternity season.

The Project entails removing 121 of the Mexican fan palms that occur at the Project site. This represents a substantial number of potential roosts for the western yellow bat. Incredibly, the DEIR provides *no analysis* of this habitat loss. Because the loss of suitable roosting habitat is one of the primary threats to the western yellow bat population,[10] and because the DEIR does not incorporate compensatory mitigation, potentially significant impacts on the western yellow bat remain unmitigated.

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[4] DEIR, p. IV.C-32.
[5] Pierson ED, Rainey WE. 1998. Western yellow bat, *Lasiurus xanthinus*. In: Bolster BC, ed. Terrestrial Mammal Species of Special Concern in California. pp. 50 and 51.
[6] Day roosts are used during the day for sleep and protection from predators and heat exposure. Night roosts are used at night to rest, digest food, conserve energy, and avoid predators. Maternity roosts are used to give birth and raise young.
[7] Austin Bat Refuge. 2021. Palm Trees [webpage]. Available at: <https://austinbatrefuge.org/palm-trees/>. (Accessed 6 May 2022).
[8] *Ibid. See also* Tatarian G. 2018. Conserving California's Bats Through Environmental Review and Permitting. CDFW Conservation Lecture Series Archive. Available at: <https://wildlife.ca.gov/Conservation/Lectures/Archive#ACEApr12>. (Accessed 6 May 2022).
[9] *Ibid.*
[10] *Ibid.*

Indirect Impacts

According to the DEIR:

> "There would also be additional indirect impacts to special-status bat species from noise and human activities associated with Project construction; however, construction activities would be temporary on an intermittent basis, and potential on-site tree roosts would be removed during the initial construction phase if no active roosts are found. As such, impacts would not diminish the long-term survival of a special-status bat species and, therefore, would be less than significant."[11]

A fundamental flaw with the DEIR's analysis is that it fails to discuss *how* noise and human activities associated with construction would impact bats at the Project site. For example, the DEIR does not identify whether construction activities would affect vital rates (e.g., survival and recruitment), behavior (e.g., roost attendance, sleep and torpor, movement patterns), habitat use, predator-prey relationships, or other variables that may influence the bat population. This precludes the public's ability to validate the DEIR's conclusion that Project impacts "would not diminish the long-term survival of a special-status bat species and, therefore, would be less than significant."

The DEIR provides two reasons for its determination that Project impacts to special-status bats would be less than significant. The DEIR's first reason is that construction activities would be "temporary." Project construction activities would occur for approximately two and a half years,[12] which would encompass two or three reproductive cycles of the bat population (bats reproduce only once per year). Bats have low reproductive rates, high juvenile mortality, and long generational turnover.[13] Consequently, any reduction in reproductive output (or success) can have a substantial impact on viability of the bat population. Indeed, it can take a colony (population) many years to recover from activities that cause mortality or even temporary reduced fecundity (i.e., the ability to produce offspring).[14] Therefore, although a 2.5-year impact might be temporary from a human perspective, it is not "temporary" from the bat's perspective.

The DEIR's second reason is that potential roosts would be removed during the initial construction phase. This reason is both confusing and illogical. First, the rationale is confusing because the Project does not involve removal of all potential roosts (e.g., 181 trees would remain, of which 53 are Mexican fan palms).[15] Therefore, removing potential roosts (trees) during the initial construction phase does not eliminate the potential for significant indirect impacts to bats. Second, the rationale is illogical because removing potential roosts would generate a different type of indirect impact to bats. Specifically, removing roosts would eliminate a habitat element essential to survival and reproduction. If replacement roosts are not

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[11] DEIR, pp. IV.C-40 and -41.
[12] DEIR, p. II-61.
[13] Western Bat Working Group. 2005 [update]. Species account for the western yellow bat. Available at: <http://wbwg.org/western-bat-species/>. (Accessed 6 May 2022).
[14] Johnston D, Tatarian G, Pierson E. 2004. California Bat Mitigation Techniques, Solutions, and Effectiveness. Report to California Department of Transportation, Sacramento, California. Project Number 2394-01.
[15] DEIR, pp. IV.C-54 and -55.

available, the loss of roosts from the Project site would eliminate the reproductive potential of all individuals that are displaced from the Project site. As a result, and contrary to the DEIR's assertion, removing roosts from the Project site would reduce the potential for "long-term survival," especially for an organism that is already exposed to numerous threats (e.g., habitat loss, pesticides, and wind turbine strikes, among others).

The DEIR Fails to Provide an Accurate Assessment of Impacts to the California Brittlebush Scrub Community (A Sensitive Natural Community)

In 2017, the Zev Greenway was restored to native coastal sage scrub habitat along a majority of the Project Site's southern boundary. The restored habitat includes a diverse mix of native species (although some non-native species remain). Because California brittlebush (*Encelia californica*) is the dominant species in the restoration area, it was classified as California brittlebush scrub, which is a sensitive natural community in the State of California.[16]

The DEIR states that the proposed river connection trail, river fence, and river overlook would directly impact 0.14 acres of California brittlebush scrub. However, according to the DEIR, the Project would not have significant indirect impacts on the California brittlebush scrub community because: (a) it occurs along an existing public trail (i.e., the Zev Greenway trail), and (b) "plants would not be affected by subtle changes in Project light, noise, or human activity."[17] The DEIR's rationale is flawed because it fails to recognize that the Project would not only increase human activity along the existing trail, but that it would also create a new trail that bisects the California brittlebush scrub community, thereby increasing the proportion of that community that would be susceptible to trampling, weed invasion, and other adverse edge effects associated with fragmentation. In addition, because the proposed river connection trail would not provide the shortest route to the Zev Greenway trail, students and spectators are likely to create shortcuts (and other unauthorized trail routes) through the California brittlebush scrub, as depicted in Figure 1 (below). This would cause further loss, degradation, and fragmentation of the sensitive natural community. The DEIR fails to incorporate mitigation for this potentially significant indirect impact.

The Project includes installation of 38 trees in the California brittlebush scrub community along the Zev Greenway.[18] As these trees mature, they will substantially decrease the amount of sunlight reaching plants in the shrub layer. This is important because California brittlebush, coast goldenbush, Nevin's barberry (an endangered species), and most of the other plant species that occur along the Zev Greenway are adapted to full sun (or part shade),[19] and thus are unlikely to persist in the shady conditions created by the Project's trees. The DEIR fails to analyze this potentially significant indirect impact on the California brittlebush scrub community and the two Nevin's barberry plants that occur therein.

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[16] DEIR, p. IV.C-19.
[17] DEIR, p. IV.C-43.
[18] DEIR, Figure IV.C-5.
[19] California Native Plant Society. 2022. Calscape [website]. Available at: <https://calscape.org/>. (Accessed 4 May 2022). *See also* California Native Plant Society. 2022. A Manual of California Vegetation, Online Edition. Available at: <https://vegetation.cnps.org/>. (Accessed 4 May 2022).

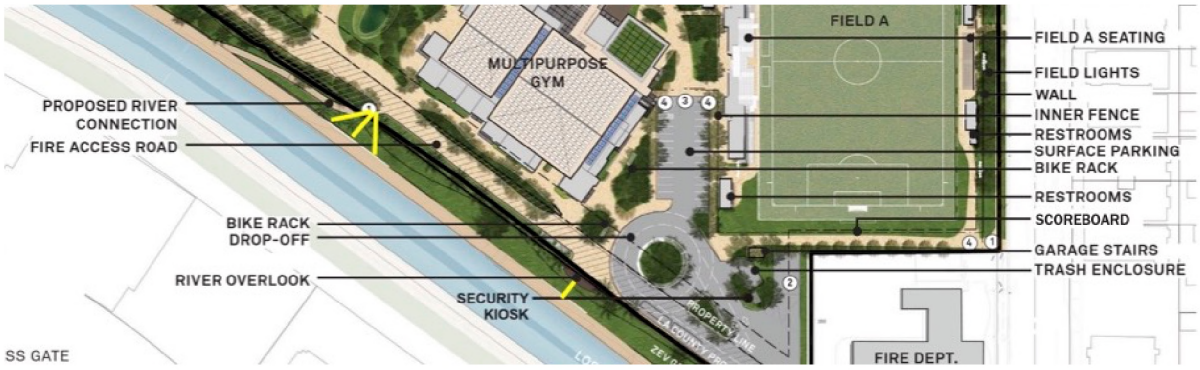


Figure 1. Unauthorized trail shortcuts (yellow lines) that are likely to be created through the California brittlebush scrub community following Project development.

The DEIR Fails to Disclose, Analyze, or Incorporate Mitigation for Avian Collisions

The Project site and adjacent Los Angeles River corridor support at least 74 species of birds,[20] some of which are classified as special-status species.[21] These include summer residents, winter residents, year-round residents, and birds that move through the Project area during migration.

Collision with windows is second only to predation by domestic cats as an anthropogenic source of avian mortality.[22] Klem (2009) estimated over one billion birds are killed each year due to collisions with clear and reflective sheet glass in the U.S. alone.[23,24] The visual system of birds is simply not capable of perceiving glass as a physical obstacle.[25] Casualties occur from head trauma after leaving a perch from as little as one meter away in an attempt to reach habitat seen through, or reflected in, clear and tinted panes.[26] Glass windows kill birds in urban, suburban, and rural settings.[27] There is no window size, building structure, time of day, season of year, or

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[20] DEIR, Appendix B to Appendix D (Biological Resources Technical Report). *See also checklist for the Los Angeles River--Whitsett to Coldwater Hotspot at:* eBird. 2022. eBird: An online database of bird distribution and abundance [web application]. eBird, Cornell Lab of Ornithology, Ithaca, New York. Available at: <http://www.ebird.org>. (Accessed 5 May 2022).

[21] Special-status species documented in the Project are include the osprey, Cooper's hawk, rufous hummingbird, Vaux's swift, and yellow warbler. *See* California Department of Fish and Wildlife, California Natural Diversity Database. 2022 Apr. Special Animals List. Available at: <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=109406>. (Accessed 5 May 2022).

[22] Loss SR, Will T, Loss SS, Marra PP. 2014. Bird-Building Collisions in the United States: Estimates of Annual Mortality and Species Vulnerability. The Condor 116:8–23.

[23] Klem D Jr. 2009. Avian Mortality at Windows: The Second Largest Human Source of Bird Mortality on Earth. Proceedings of the Fourth International Partners in Flight Conference: Tundra to Tropics. 244-251.

[24] Daniel Klem Jr. is an ornithologist known for his pioneering research into the mortality of birds due to glass windows. He is Sarkis Acopian Professor of Ornithology and Conservation Biology at Muhlenberg College. Dr. Klem has been publishing peer-reviewed studies on bird-window collisions since 1989. *See* <http://www.muhlenberg.edu/main/academics/biology/facultystaff/danielklemjr/>.

[25] Klem D Jr. 2009. Preventing Bird-Window Collisions. The Wilson Journal of Ornithology 121(2):314–321.

[26] Klem D Jr. 2009. Avian Mortality at Windows: The Second Largest Human Source of Bird Mortality on Earth. Proceedings of the Fourth International Partners in Flight Conference: Tundra to Tropics. 244-251.

[27] Klem D Jr. 1990. Collisions Between Birds and Windows: Mortality and Prevention. Journal of Field Ornithology. 61(1):120-128.

weather conditions during which birds elude the lethal hazards of glass.[28]

Scientists have determined that bird mortality caused by collisions with structures is "biologically significant"[29] and that avian mortality from window collisions is contributing to population declines of special-status species and birds in general.[30] As a result, several cities (e.g., San Francisco, New York) have adopted standards for "bird-safe" buildings.

Causal Factors of Avian Collisions

There are two factors that cause birds to collide with human-built structures. The first is the lighting of structures at night, which "traps" and disorients many species of nocturnal migrants, making them vulnerable to collision with obstructions.[31] Those birds that are not killed outright by impact with lit windows are disoriented by the light and continue to fly around the light source, often to the point of exhaustion (which often leads to death).[32]

The second factor is the presence of architectural glass (e.g., windows), which birds in flight either cannot detect, or misinterpret.[33] Almost every type of architectural glass under the right conditions reflects the sky, clouds, or nearby trees and vegetation.[34] Glass that reflects the environment presents birds with the appearance of safe routes, shelter, and possibly food ahead. When birds try to fly to the reflected habitat, they hit the glass.

The bulk of bird deaths result when lone, confused birds mistake glass for a safe flight path.[35] During migration, birds make stops to rest and refuel. After landing, these birds make short, low flights near dawn, searching for feeding areas.[36] Thus, they are susceptible to collisions as they ascend, descend, and search for the resources needed to continue their migratory journey. Consequently, night-migrating songbirds[37]—already imperiled by habitat loss and other environmental stressors—face a dual risk, threatened both by illuminated buildings when they

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[28] Klem D Jr. 2009. Avian Mortality at Windows: The Second Largest Human Source of Bird Mortality on Earth. Proceedings of the Fourth International Partners in Flight Conference: Tundra to Tropics. 244-251.
[29] Longcore T, Rich C, Gauthreaux SA Jr. 2005. Scientific Basis to Establish Policy Regulating Communications Towers to Protect Migratory Birds. WT Docket No. 03-187, Federal Communications Commission Notice of Inquiry. Available at: <https://ecfsapi.fcc.gov/file/6517288491.pdf>.
[30] Klem D Jr. 2009. Preventing Bird-Window Collisions. Wilson Journal of Ornithology 121(2):314-321. *See also* Klem D Jr. 1990. Collisions Between Birds and Windows: Mortality and Prevention. Journal of Field Ornithology. 61(1):120-128.
[31] Ogden LJ. 1996. Collision Course: The Hazards of Lighted Structures and Windows to Migrating Birds. A Special Report for the World Wildlife Fund Canada and the Fatal Light Awareness Program. 45 pp.
[32] *Ibid.*
[33] Klem D Jr. 1990. Collisions Between Birds and Windows: Mortality and Prevention. Journal of Field Ornithology. 61(1):120-128. *See also* Klem D Jr. 2009. Preventing Bird-Window Collisions. Wilson Journal of Ornithology 121(2):314-321.
[34] San Francisco Planning Department (*and references therein*). 2011. Standards for Bird-Safe Buildings. 42 pp.
[35] Klem D Jr. 1990. Collisions Between Birds and Windows: Mortality and Prevention. Journal of Field Ornithology. 61(1):120-128.
[36] Ogden LJ. 1996. Collision Course: The Hazards of Lighted Structures and Windows to Migrating Birds. A Special Report for the World Wildlife Fund Canada and the Fatal Light Awareness Program. 45 pp.
[37] Most songbirds migrate at night.

fly at night and by daytime glass collisions as they seek food and shelter.[38]

Project-Specific Hazards

A poorly designed building can kill hundreds of birds per year.[39] A few variables in particular have proven to be especially lethal to birds. As described below, the proposed Project incorporates design variables known to cause high levels of avian mortality:

1. Buildings with reflective or transparent windows, large windows, or a high percentage of glass.

Birds have been reported to strike two general types of windows: (1) transparent windows, which appear invisible to birds and (2) reflective windows, which mirror the facing habitat.[40] In addition, studies have shown that buildings with large windows or a high percentage of glass kill a disproportionately high number of birds.[41]

The proposed Project would have transparent and reflective windows.[42] All of the Project's buildings would have large windows (or panes of glass).[43] In addition, the proposed gymnasium and swimming pool buildings would contain a high percentage of glass. Indeed, one of the sustainability features touted in the DEIR is: "[n]atural light to be harvested for the main spaces in the gymnasium building using *large expanses of glass* and skylights…"[44]

The threat large expanses of glass pose to birds is exacerbated when windows are installed on opposite sides of a building directly across from one another or at a corner, because birds perceive an unobstructed passageway and fly towards the glass with no awareness of an obstacle.[45] The proposed gymnasium and pool buildings would possess this "design trap."

2. Buildings with windows located adjacent to extensive vegetation.

Several studies have provided evidence that buildings with windows adjacent to extensive

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[38] San Francisco Planning Department (*and references therein*). 2011. Standards for Bird-Safe Buildings. 42 pp.
[39] Hager SB, Trudell H, McKay KJ, Crandall SM, Mayer L. 2008. Bird Density and Mortality at Windows. Wilson Journal of Ornithology 120(3):550-564.
[40] Gelb Y, Delacretaz N. 2009. Windows and Vegetation: Primary Factors in Manhattan Bird Collisions. Northeastern Naturalist 16(3):455-470. *See also* Klem D Jr. 1989. Bird Window Collisions. The Wilson Bulletin 101(4):606-620.
[41] Klem D Jr, Farmer CJ, Delacretaz N, Gelb Y, Saenger PG. 2009. Architectural and Landscape Risk Factors Associated with Bird-Glass Collisions in an Urban Environment. Wilson Journal of Ornithology 121(1):126-134. *See also* Parkins KL, Elbin SB, Barnes E. 2015. Light, Glass, and Bird–building Collisions in an Urban Park. Northeastern Naturalist 22(1):84-94. *See also* Hager SB, Trudell H, McKay KJ, Crandall SM, Mayer L. 2008. Bird Density and Mortality at Windows. Wilson Journal of Ornithology 120(3):550-564.
[42] *See* DEIR, Figures II-7, II-8, and II-13. Glass can appear transparent or highly reflective, depending on weather or time of day.
[43] *See* DEIR, Figures II-7, II-8, and II-13.
[44] DEIR, p. II-60. [emphasis added].
[45] New York City Audubon. 2007. Bird-Safe Building Guidelines. p. 6.

vegetation kill numerous birds.[46] Buildings that have windows at lower stories (below 60 feet) are the most dangerous because those windows are at or below canopy height and are more likely to reflect trees and other landscape features that attract birds.[47] In suburban areas, buildings with these features have been documented to kill an average of 30 birds per year (per building).[48] This combination may be even more lethal in urban areas. Studies of Manhattan structures with large swaths of windows adjacent to large open spaces have recorded well over 100 collisions per year (per structure).[49]

The proposed Project includes installation of large expanses of glass near ground level and adjacent to vegetation attractive to birds.[50] This would create a significant collision hazard to birds.

The American Bird Conservancy and New York City Audubon Society have developed bird-friendly design standards for new buildings.[51] Because the Project does not incorporate these (or comparable) design standards, the Project's impact on bird populations would be potentially significant.

MITIGATION ISSUES

BIO-MM-1 (Special-Status Bats)

BIO-MM-1 requires the Applicant to implement either of the following measures:

1) "Tree removal activities shall be scheduled outside of the maternity roosting season (October 1 through February 28) to avoid potential impacts to special-status bat species."
2) "Any construction or palm tree removal activities that occur during the maternity roosting season for special-status bat species (March 1 through September 30) shall require a qualified biologist experienced with bat roost biology to conduct a pre-construction (or pre-tree removal) survey, using sonic bat detectors (e.g., Anabat or Sonobat) to determine whether special-status bat species are roosting within trees that would be removed. The surveys shall be conducted at dusk and after nightfall by a biologist. If an active roost site is located during the pre-construction survey, the roost shall be avoided and Project activities shall be conducted as recommended by the biologist to avoid the area, which may include temporary postponement or provision of a suitable buffer established around

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[46] San Francisco Planning Department (*and references therein*). 2011. Standards for Bird-Safe Buildings. 42 pp. *See also* Gelb Y, Delacretaz N. 2009. Windows and Vegetation: Primary Factors in Manhattan Bird Collisions. Northeastern Naturalist 16(3):455-470. *See also* Klem D Jr, Farmer CJ, Delacretaz N, Gelb Y, Saenger PG. 2009. Architectural and Landscape Risk Factors Associated with Bird-Glass Collisions in an Urban Environment. Wilson Journal of Ornithology 121(1):126-134.

[47] *Ibid.*

[48] Klem D Jr. 1990. Collisions Between Birds and Windows: Mortality and Prevention. Journal of Field Ornithology. 61(1):120-128. *See also* O'Connell TJ. 2001. Avian Window Strike Mortality at a Suburban Office Park. The Raven 72(2):141-149.

[49] Gelb Y, Delacretaz N. 2009. Windows and Vegetation: Primary Factors in Manhattan Bird Collisions. Northeastern Naturalist 16(3):455-470.

[50] *See* DEIR, Figures IV.C-5 and -6.

[51] American Bird Conservancy and New York City Audubon Society. 2015. Bird-Friendly Building Design, 2nd Ed. Available at: <https://abcbirds.org/wp-content/uploads/2015/05/Bird-friendly-Building-Guide_LINKS.pdf>

the roost until roosting activities cease. Suitable buffers could include netting, canvas, or similar materials as recommended by the biologist. A report shall be submitted to the City with the results of the pre-construction or tree removal survey and any needed maternity roost avoidance actions."

As discussed previously, tree removal outside of the maternity roosting season would avoid direct impacts to bats that use the trees for maternity purposes, but it would not avoid direct impacts to bats that use the trees as day roosts.[52]

There are several reasons why the second approach (i.e., pre-construction survey and buffer) would not reduce potentially significant direct impacts on bats. First, the measure applies only to roosts occupied by special-status bats, thus providing no protection to maternity roosts occupied by other bat species. An impact to a maternity roost of *any* bat species would constitute a significant impact because it would "impede the use of native wildlife nursery sites" (i.e., CEQA significance threshold "d").[53]

Second, although bat detectors can be relatively effective in detecting bat activity, they do not identify roost locations. Furthermore, even when appropriate techniques are implemented (i.e., visually monitoring palm trees at emergence time), it is difficult to locate roosts occupied by western yellow bats.[54] As a result, the pre-construction survey methods required under BIO-MM-1 would not provide reliable information on yellow bat roosts that may be impacted by the Project. This issue is compounded by the DEIR's failure to establish standards for the "qualified biologist" that would conduct the survey.

Third, BIO-MM-1 lacks the specificity needed to ensure reliable data on presence of bats in areas that would be impacted by the Project. Bat detection probabilities during acoustic surveys at a given site are known to vary depending on a range of factors, including weather conditions, sampling duration, number of observers/detectors deployed, and sensitivity/directionality of detector types.[55] BIO-MM-1 fails to address these variables. Importantly, the single pre-construction survey proposed in BIO-MM-1 would not be sufficient to conclude absence of bat roosts. For example, Froidevaux and others (2020) found that a minimum of three and four acoustic surveys are required to be 95% confident that a building does not host a roost of *Pipistrellus* species and *Plecotus* species, respectively.[56]

Fourth, the DEIR fails to explain how "netting, canvas, or similar materials" could be used to create a buffer around a maternity roost. To the contrary, these materials are used to exclude bats from their roosts—not to protect active roosts from construction activities. Furthermore, bat biologists recommend against netting because it is known to trap (or entangle) bats and birds.[57]

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[52] Presumably trees would be felled only during the daytime.
[53] *See* DEIR, p. IV.C-29.
[54] Western Bat Working Group. 2005 [update]. Species account for the western yellow bat. Available at: <http://wbwg.org/western-bat-species/>. (Accessed 6 May 2022).
[55] Froidevaux JSP, Boughey KL, Hawkins CL, Jones G, Collins J. 2020. Evaluating survey methods for bat roost detection in ecological impact assessment. Animal Conservation 23(5) 597-606.
[56] *Ibid.*
[57] Johnston D, Tatarian G, Pierson E. 2004. California Bat Mitigation Techniques, Solutions, and Effectiveness. Report to California Department of Transportation, Sacramento, California. Project Number 2394-01.

Consequently, the DEIR must disclose and analyze potentially significant impacts caused by implementation of BIO-MM-1 if netting might be installed at the Project site.

Fifth, the DEIR does not identify what would be considered a "suitable buffer," nor does it establish performance standards BIO-MM-1. Furthermore, although BIO-MM-1 requires a report that documents "any needed maternity roost avoidance actions," it does not require monitoring to evaluate the efficacy of those actions. As a result, the DEIR provides no assurances that BIO-MM-1 would be successful in preventing significant impacts to bats.

BIO-MM-2 (California Brittlebush Scrub)

BIO-MM-2 states:

> "Prior to issuance of a building permit, Harvard-Westlake School shall submit to the Department of City Planning a landscape plan or mitigation plan depicting replacement of an equivalent acreage of California brittlebush scrub removed at a 1:1 ratio. The sensitive natural community does not need to be dominated only by California brittlebush, but this species shall be prevalent within the community, and the native scrub mix proposed shall use similar species as used for the Zev Greenway restoration habitat. The replacement of sensitive natural community habitat shall be planted clustered adjacent to and contiguous with the Zev Greenway, and the locations and species shall be to the satisfaction of the Department of City Planning and in conformance with the landscape and planting guidelines in the Los Angeles River Master Plan Landscaping Guidelines and Plant Palettes. Replacement sensitive natural community habitat areas shall be planted on-site and shall be shown on the Project's landscape plan. The restored sensitive natural community shall be monitored for five years to verify that California brittlebush scrub has been successfully restored."

There are several problems with BIO-MM-2. First, the DEIR fails to demonstrate it would be feasible to create 0.14 acres of replacement habitat on-site and adjacent to the Zev Greenway. Most of the habitat adjacent to the Zev Greenway already consists of California brittlebush scrub (and therefore does not qualify as a potential mitigation site).[58] Although there are small patches of "Disturbed" and "Ornamental" vegetation along the Greenway near the Project's southwestern boundary, it is unclear whether there would be 0.14 acres "on-site" that could be restored to California brittlebush scrub, especially given the Applicant's plan to plant trees in that area.[59]

Second, the DEIR does not establish performance standards for BIO-MM-2, nor does it identify the variables that would be evaluated to determine whether the California brittlebush scrub had been "successfully restored." As a result, the DEIR lacks assurances that BIO-MM-2 would be effective in mitigating the Project's impacts to less-than-significant levels.

Third, BIO-MM-2 fails to incorporate a mechanism that would ensure the compensation habitat is maintained (and properly managed) in perpetuity. That is, there is not mechanism that would

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[58] DEIR, Figure IV.C-3.
[59] DEIR, Figure IV.C-5.

prevent the Applicant from removing the compensation habitat upon termination of the five-year monitoring period.

For these reasons, BIO-MM-2 does not ensure the Project's impacts to California brittlebush scrub would be mitigated to less-than-significant levels.

Sincerely,



Scott Cashen, M.S.
Senior Biologist

APPLICATIONS

APPEAL APPLICATION
Instructions and Checklist

THIS SECTION FOR CITY PLANNING STAFF USE ONLY

Base Fee: $229

Reviewed & Accepted by (DSC Planner): J. Chan

Receipt No.: 200595528252 **Date:** 4/30/26

☑ Determination authority notified ☐ Receipt Number: _____

PURPOSE

This application is for the appeal of Los Angeles Department of City Planning determinations, as authorized by the LAMC. For California Environmental Quality Act Appeals use form CP13-7840. For Building and Safety Appeals and Housing Department Appeals, use form CP13-7854.

RELATED CODE SECTION

Refer to the Letter of Determination (LOD) for the subject case to identify the applicable Los Angeles Municipal Code (LAMC) Section for the entitlement and the appeal procedures.

APPELLATE BODY

Check only one. If unsure of the Appellate Body, check with City Planning staff before submission.

☐ Area Planning Commission (APC) ☑ City Planning Commission (CPC) ☐ City Council

☐ Zoning Administrator (ZA)

CASE INFORMATION

Case Number: VTT-84453 / ENV-2025-5697-SE

APN: 2375018013

Project Address: 12501 Ventura Blvd.

Final Date to Appeal: 4/30/2026

JUSTIFICATION / REASON FOR APPEAL

Is the decision being appealed in its entirety or in part? ☐ **Entire** ☑ **Part**

Are specific Conditions of Approval being appealed? ☑ **YES** ☐ **NO**

If Yes, list the Condition Number(s) here: S-3 and environmental

On a separate sheet provide the following:

- ☐ Reason(s) for the appeal
- ☐ Specific points at issue
- ☐ How you are aggrieved by the decision

APPELLANT

Check all that apply.

☑ Person, other than the Applicant, Owner or Operator claiming to be aggrieved

☐ Representative ☐ Property Owner ☐ Applicant ☐ Operator of the Use/Site

APPELLANT INFORMATION

Appellant Name: Marianne King

Company/Organization:

Mailing Address: 10041 Farralone Ave.

City: Chatsworth **State:** CA **Zip Code:** 91311

Telephone: 8182982026 **E-mail:** making@socal.rr.com

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

☑ Self ☐ Other:

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

REPRESENTATIVE / AGENT INFORMATION

Name:

Company/Organization:

Mailing Address:

City: **State:** **Zip Code:**

Telephone: **E-mail:**

APPLICANT'S AFFIDAVIT

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

Appellant Signature: marianne king **Date:** 4/30/2026

GENERAL NOTES

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

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

GENERAL APPEAL FILING REQUIREMENTS

An appeal application must be submitted and paid for before 4:30 PM (PST) on the final day to appeal the determination. Should the final day fall on a weekend or legal City holiday, the time for filing an appeal shall be extended to 4:30 PM (PST) on the next succeeding working day. Appeals should be filed early to ensure the Development Services Center (DSC) staff has adequate time to review and accept the documents, and to allow appellants time to submit payment. Appeals may be filed either online or in person as referenced below.

ONLINE APPEAL FILINGS THROUGH ONLINE APPLICATION SYSTEM (OAS)

Online Application System (OAS): The OAS (https://planning.lacity.gov/oas) allows entitlement appeals to be submitted entirely electronically by allowing an appellant to fill out and submit an appeal application online directly to City Planning's DSC, and submit fee payment by credit card or e-check.	QR Code to Online Appeal Filing

IN PERSON APPEAL FILINGS

Drop off at DSC: Appeals of this determination can be submitted in-person at the Metro or Van Nuys DSC locations, as well as the South Los Angeles DSC on Tuesdays and Thursdays, and payment can be made by credit card or check.

a. City Planning has established drop-off areas at the DSCs with physical boxes where appellants can drop off appeal applications.

b. Alternatively, appeal applications can be filed with staff at DSC public counters. Appeal applications must be on the prescribed forms, and accompanied by the required fee and a copy of the determination letter. Appeal applications shall be received by the DSC public counter and paid for on or before the above date or the appeal will not be accepted.

CITY PLANNING DEVELOPMENT SERVICES CENTERS – PUBLIC COUNTERS

Office	Address	Phone Number	Email
Metro DSC	201 N. Figueroa Street 4th Floor Los Angeles, CA 90012	(213) 482-7077	planning.figcounter@lacity.org
Van Nuys DSC	6262 Van Nuys Boulevard, Suite 251 Van Nuys, CA 91401	(818) 374-5050	planning.mbc2@lacity.org
South LA DSC *Tuesday and Thursday Only*	8475 S. Vermont Avenue, 1st Floor Los Angeles, CA 90044	(213) 978-1465	planning.southla@lacity.org

City Planning staff may follow up with the appellant via email and/or phone if there are any questions or missing materials in the appeal submission, to ensure that the appeal package is complete and meets the applicable LAMC provisions.

If you seek judicial review of any decision of the City pursuant to California Code of Civil procedure Section 1094.5, the petition for writ of mandate pursuant to that section must be filed no later than the 90th day following the date on which the City's decision became final pursuant to California Code of Civil Procedure Section 1094.6. There may be other time limits which also affect your ability to seek judicial review.

APPEAL DOCUMENTS

1. Hard Copy

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

- ☐ Appeal Application
- ☐ Justification/Reason for Appeal
- ☐ Copy of Letter of Determination (LOD) for the decision being appealed

2. Electronic Copy

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

3. Appeal Fee

- ☐ *Original Applicant.* The fee charged shall be in accordance with LAMC Section 19.01 B.1(a) of Chapter 1 or LAMC Section 15.1.1.F.1.a. (Appeal Fees) of Chapter 1A as applicable, or a fee

equal to 85% of the original base application fee. Provide a copy of the original application receipt(s) to calculate the fee.

☐ *Aggrieved Party. The fee charged shall be in accordance with LAMC Section 19.01 B.1(b) of Chapter 1 or LAMC Section 15.1.1.F.1.b. (Appeal Fees) of Chapter 1A as applicable.*

4. Noticing Requirements (Applicant Appeals Only)

☐ *Copy of Mailing Labels.* All appeals require noticing of the appeal hearing per the applicable LAMC Section(s). Original Applicants must provide noticing per the LAMC for all Applicant appeals. See the Mailing Procedures Instructions (CP13-2074) for applicable requirements.

SPECIFIC CASE TYPES
ADDITIONAL APPEAL FILING REQUIREMENTS AND / OR LIMITATIONS

DENSITY BONUS (DB) / TRANSIT ORIENTED COMMUNITES (TOC)

Appeal procedures for DB/TOC cases are pursuant to LAMC Section 13B.2.5. (Director Determination) of Chapter 1A or LAMC Section 13B.2.3. (Class 3 Conditional Use) of Chapter 1A as applicable.

- Off-Menu Incentives or Waiver of Development Standards are not appealable.
- Appeals of On-Menu Density Bonus or Additional Incentives for TOC cases can only be filed by adjacent owners or tenants and is appealable to the City Planning Commission.
    - ☐ Provide documentation confirming adjacent owner or tenant status is required (e.g., a lease agreement, rent receipt, utility bill, property tax bill, ZIMAS, driver's license, bill statement).

WAIVER OF DEDICATION AND / OR IMPROVEMENT

Procedures for appeals of Waiver of Dedication and/or Improvements (WDIs) are pursuant to LAMC Section 12.37 I of Chapter 1 or LAMC Section 10.1.10. (Waiver and Appeals) of Chapter 1A as applicable.

- WDIs for by-right projects can only be appealed by the Property Owner.
- If the WDI is part of a larger discretionary project, the applicant may appeal pursuant to the procedures which govern the main entitlement.

[VESTING] TENTATIVE TRACT MAP

Procedures for appeals of [Vesting] Tentative Tract Maps are pursuant LAMC Section 13B.7.3.G. of Chapter 1A.

- Appeals must be filed within 10 days of the date of the written determination of the decision-maker.

NUISANCE ABATEMENT / REVOCATIONS

Appeal procedures for Nuisance Abatement/Revocations are pursuant to LAMC Section 13B.6.2.G. of Chapter 1A. Nuisance Abatement/Revocations cases are only appealable to the City Council.

Appeal Fee

- ☐ *Applicant (Owner/Operator).* The fee charged shall be in accordance with the LAMC Section 19.01 B.1(a) of Chapter 1 or LAMC Section 15.1.1.F.1.a. (Appeal Fees) of Chapter 1A as applicable.

  For appeals filed by the property owner and/or business owner/operator, or any individuals/agents/representatives/associates affiliated with the property and business, who files the appeal on behalf of the property owner and/or business owner/operator, appeal application fees listed under LAMC Section 19.01 B.1(a) of Chapter 1 shall be paid, at the time the appeal application is submitted, or the appeal application will not be accepted.

- ☐ *Aggrieved Party.* The fee charged shall be in accordance with the LAMC Section 19.01 B.1(b) of Chapter 1 or LAMC Section 15.1.1.F.1.b. (Appeal Fees) of Chapter 1A as applicable.

Appeal of VTT-84453 / ENV-2025-5697-SE

Appeal Reasons:

1. **Opposed to 10-foot wide concrete sidewalk on Valley Heart** – The BOE recommendation per Condition No. S-3(i)(3) calls for a 10-foot wide concrete sidewalk on Valley Heart, which is a Local Street. Given the location of the site and length of the sidewalk, approximately 1,400 feet, a combination sidewalk and grass parkway with trees in the parkway would be a more ecologically balanced approach for this project as it is across from the LA River open space area. BOE never answered the question at the public hearing nor was it addressed in the LOD issued the next day. A combination 5-foot side walk and 5-foot parkway, or even 6 foot and 4 foot parkway would help to reduce site runoff, providing close to 5,000 square feet of permeable area, and it will be a better environment for trees to grow and thrive, as well as provide relief quick for dog owners. The parkway side would be best suited internal to the sidewalk so street trees will not have to compete for space from street lights or from car doors, etc. Ideally, intermittent bioswales should be considered along this parkway for better runoff capture and filtering. It should be noted, currently only 250 feet of Valley Heart has a sidewalk, from Whitsett Ave. The remainder is varied width of grass, trees, and concrete curb.

2. **Opposed to number of street lights on Valley Heart**. The Landscape Plan shows 20 street lights on Valley Heart even though BSL is recommending 10 street lights on Valley Heart. Even 10 street lights, one very 140 feet, seems excessive when adjacent to the LA River open space area. It should be noted that the LA River walkway does have pedestrian lighting along the pathway. The concern is too much illumination will have an adverse impact on wildlife, such as birds, owls, etc, that are nocturnal. A suggestion would be to reduce the number of street lights perhaps for the residential length of the project.

3. **Opposed to Landscape Plan.** First, there are 240 trees to be removed. This is a significant impact to bird habitat. The landscape plan shows 172 trees to be planted on-site, not 207 as indicated. Out of 172 trees to be planted, only 28 trees are California Native trees. The landscape plan should be 75 percent California Native per the LA River Master Plan. Additionally, the 34 street trees shown along Valley Heart will likely be much less because BSL will not permit street trees within 20 feet on either side of a

street light. Lastly, no artificial turf, please! This is next the LA River, we need to stop with artificial turf, especially near sensitive ecological areas.

4. **Opposed to 1 ½ foot rear yard setback on Valley Heart.** This project is too massive and intrusive on the river side. At the hearing, it was confirmed by BOE that the 5-foot dedication shown on the tract map along Ventura Boulevard was not needed. If that is the case, there is room to provide a greater setback on Valley Heart.

5. **Shading concern along LA River habitat area.** The project at 84-feet (7-stories) just 30 feet away from the north side of Valley Heart, includes a mix of trees, sycamores, then of course the river. The shading from this project could adversely impact the river habitat area.

   Overall, projects along the LA River should meet a higher standard of ecological harmony and balance. This is a on going open space project for the future of this city. We need to make sure we don't loose sight of this precious resource.

COUNTY CLERK'S USE

CITY OF LOS ANGELES
OFFICE OF THE CITY CLERK
200 NORTH SPRING STREET, ROOM 395
LOS ANGELES, CALIFORNIA 90012

CALIFORNIA ENVIRONMENTAL QUALITY ACT

NOTICE OF EXEMPTION

(PRC Section 21152; CEQA Guidelines Section 15062)

Pursuant to Public Resources Code § 21152(b) and CEQA Guidelines § 15062, the notice should be posted with the County Clerk by mailing the form and posting fee payment to the following address: Los Angeles County Clerk/Recorder, Environmental Notices, P.O. Box 1208, Norwalk, CA 90650. Pursuant to Public Resources Code § 21167 (d), the posting of this notice starts a 35-day statute of limitations on court challenges to reliance on an exemption for the project. Failure to file this notice as provided above, results in the statute of limitations being extended to 180 days.

PARENT CASE NUMBER(S) / REQUESTED ENTITLEMENTS
CPC-2025-5697-DB-PR-SPPC-MCUP-VHCA & VTT-84453-VHCA / Density Bonus, Project Review, Specific Plan Project Compliance, Main Conditional Use Permit & Vesting Tentative Tract

LEAD CITY AGENCY	CASE NUMBER
City of Los Angeles (Department of City Planning)	ENV-2025-5698-SE
PROJECT TITLE Riverwalk at Studio City	COUNCIL DISTRICT CD 4 - Raman

PROJECT LOCATION (Street Address and Cross Streets and/or Attached Map) ☐ Map attached.
12555 West Ventura Boulevard cross streets Whitsett Avenue

PROJECT DESCRIPTION: ☐ Additional page(s) attached.
The project is 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, 46 units reserved for Very Low Income Households, and approximately 75,968 square feet commercial uses. The project will provide a total of 1,040 residential parking spaces within four levels of subterranean parking, and 30 short-term and 324 long-term bicycle parking spaces. The project will provide a total of 760 commercial parking spaces within four levels of subterranean parking, and 38 short-term and 40 long-term bicycle commercial parking spaces. The project will provide 89,937 square feet of open space including 55,866 square feet common open space, 12,966 square feet of indoor open space, and 21,105 square feet of private balconies. The project proposes the removal of all existing on-site non-protected trees. The project proposes grading and exporting approximately 521,000 cubic yards of earth and the removal of 240 non-protected trees from the project site and three (3) non-protected trees from public right-of-way.

NAME OF APPLICANT / OWNER:
Brett Torino & Eleda Cohen/SCW 34K, LLC; Studio City East 93K, LLC; Studio City Sports Center, LLC

CONTACT PERSON (If different from Applicant/Owner above)	(AREA CODE) TELEPHONE NUMBER | EXT.
Rose Fistrovic	(213) 223-1537

EXEMPT STATUS: (Check all boxes, and include all exemptions, that apply and provide relevant citations.)

STATE CEQA STATUTE & GUIDELINES

☒ STATUTORY EXEMPTION(S)

Public Resources Code Section(s) **21080.66**

☐ CATEGORICAL EXEMPTION(S) (State CEQA Guidelines Sec. 15301-15333 / Class 1-Class 33)

CEQA Guideline Section(s) / Class(es) _____

☐ OTHER BASIS FOR EXEMPTION (E.g., CEQA Guidelines Section 15061(b)(3) or (b)(4) or Section 15378(b)

_____

JUSTIFICATION FOR PROJECT EXEMPTION: ☒ Additional page(s) attached

☒ None of the exceptions in CEQA Guidelines Section 15300.2 to the categorical exemption(s) apply to the Project; no unusual circumstance is found.

IF FILED BY APPLICANT, ATTACH CERTIFIED DOCUMENT ISSUED BY THE CITY PLANNING DEPARTMENT STATING THAT THE DEPARTMENT HAS FOUND THE PROJECT TO BE EXEMPT.
If different from the applicant, the identity of the person undertaking the project.

CITY STAFF USE ONLY:

CITY STAFF NAME AND SIGNATURE	STAFF TITLE
Adrineh Melkonian *Adrineh Melkonian*	City Planner

ENTITLEMENTS APPROVED
Density Bonus, Project Review, Specific Plan Project Compliance, Main Conditional Use Permit & Vesting Tentative Tract

DISTRIBUTION: County Clerk, Agency Record Rev. 9-17-2025

DEPARTMENT OF
CITY PLANNING

COMMISSION OFFICE
(213) 978-1300

CITY PLANNING COMMISSION

MONIQUE LAWSHE
PRESIDENT

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CITY OF LOS ANGELES
CALIFORNIA

KAREN BASS
MAYOR

EXECUTIVE OFFICES
200 N. SPRING STREET, ROOM 525
LOS ANGELES, CA 90012-4801
(213) 978-1271

VINCENT P. BERTONI, AICP
DIRECTOR

KEVIN J. KELLER, AICP
EXECUTIVE OFFICER

SHANA M.M. BONSTIN
DEPUTY DIRECTOR

HAYDEE URITA-LOPEZ
DEPUTY DIRECTOR

ARTHI L. VARMA, AICP
DEPUTY DIRECTOR

LISA M. WEBBER, AICP
DEPUTY DIRECTOR

JUSTIFICATION FOR PROJECT EXEMPTION
CASE NO. ENV-2025-5698-SE

On December 29, 2025, the Planning Department determined that the City of Los Angeles Guidelines for the implementation of the California Environmental Quality Act of 1970 and the State CEQA Guidelines designate the subject project as Statutorily Exempt under California Public Resource Code Section 21080.66.

A project qualifies for a Statutory Exemption if it is developed as a Housing Development Project as defined as 65905.5(b) of the California Government Resource Code and meets the following eligibility criteria and procedural requirements:

Eligibility Criteria

(a) Site is 20 acres or less.
(b) Site is previously developed or 75 percent of the perimeter of the site adjoins parcels developed with urban uses.
(c) Project is consistent with General Plan and Zoning; if the plan or zone is inconsistent, then consistent with the plan or the zoning.
(d) Density is 15 dwelling units per acre (for City of Los Angeles) or more.
(e) Site is not located within a coastal zone, farmland, wetlands (as defined by the U.S. Fish and Wildlife Service), very high fire hazard severity zone unless mitigation exists, hazardous waste site listed pursuant to PRC 65962.5, earthquake fault zone, special flood plain, floodway, habitat conservation plan, habitat for protected special status species, conservation easement.
(f) Not demolishing designated historic resource.
(g) No portion of the project is for hotel, motel, other transient lodging (not including residential hotel or resident use as short-term lodging).

Procedural Requirements

(a) Tribal Notification/Consultation
(b) Condition for Phase I Environmental Site Assessment (ESA) and if necessary, mitigation is necessary.
(c) Conditions added to housing within 500 feet of freeway.

Project Description

The project is 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, 46 units reserved for Very Low Income Households, and approximately 75,968 square feet commercial uses. Three two-story commercial buildings ranging in size from 8,506 square feet to 21,102 square feet and 36 feet in height are proposed to be located at the eastern portion of the

Project Site. The mixed use seven-story building is proposed to be 84 feet in height as measured from the lowest grade along Valleyheart Drive to the top of the highest point on the building. No hotel, motel, other transient lodging are proposed as part of this project.

The project will provide a total of 1,040 residential parking spaces within four levels of subterranean parking, and 30 short-term and 324 long-term bicycle parking spaces. The project will provide a total of 760 commercial parking spaces within four levels of subterranean parking, and 38 residential short-term and 40 long-term bicycle parking spaces. The project will provide 89,937 square feet of open space including 55,866 square feet common open space, 12,966 square feet indoor common open space, and 21,105 square feet of private balconies. The project proposes the removal of all existing on-site non-protected trees and three street trees from the public right-of-way. The project proposes grading and export of approximately 521,100 cubic yards of earth.

As a qualifying Housing Development Project as defined in Section 65905.5(b) of the California Government Resource Code, the project qualifies for the Statutory CEQA Exemption pursuant to California Public Resource Code Section 21080.66 as described below:

SITE AND ENVIRONMENTAL CRITERIA

(a) Site is 20 acres or less.

The project site is approximately six acres pre-dedications per the Zone Information & Map Access System (ZIMAS).

(b) Site is previously developed with or 75 percent of the perimeter of the site adjoins parcels developed with urban uses.

The site was previously developed with a multiple commercial buildings and associated parking lots since 1958.

Lots adjacent to the subject site are developed with the following urban uses: retail stores and offices with surface parking and Los Angeles County Flood Channel that was previously developed.

(c) Project is consistent with General Plan and Zoning; if the plan or zone is inconsistent, then consistent with the plan or the zoning.

The site is located in the Neighborhood & General Commercial of the Ventura/Cahuenga Boulevard Corridor Specific Plan and has a General Plan Land Use Designation of Neighborhood Office Commercial. As shown in the case file, the project is consistent with the applicable Sherman Oaks – Studio City – Toluca Lake – Cahuenga Pass Community Plan designation and policies and all applicable zoning designations and regulations.

The project seeks a density bonus request with one off-menu incentive and five waivers of development standards that are established in the Ventura/Cahuenga Boulevard Corridor Specific Plan and Los Angeles Municipal Code. Additionally, the project requires a Project Review and Specific Plan Project Compliance with the Ventura/Cahuenga Boulevard Corridor Specific Plan. The project meets the requirements of the State and City density bonus law. Excluding the incentive and waivers requests to deviate from the specific plan standards, Project complies with the Ventura/Cahuenga Boulevard Corridor Specific Plan regulations. The project also requests Main Conditional Use Permit to permit the sale and dispensing of a full-line of alcohol for on- and off-site consumption in conjunction with approximately 75,968 square feet of commercial space. Therefore, the

project is consistent with the General Plan, and complies with the local zoning, including the Ventura/Cahuenga Boulevard Corridor Specific Plan.

(d) Density is 15 dwelling units/acre (for City of Los Angeles) or more.

The Project proposes 814 dwelling units and the site is approximately six acres, making the proposed density 135 dwelling units per acre.

(e) Lot located within a Coastal Zone, farmland, wetlands (defined by USFW), VHFHSZ unless mitigation exists, hazardous waste site listed pursuant to PRC 65962.5 or DTSC pursuant to H&S Code 25356 – unless site has been cleared for residential use, earthquake fault zone, special flood hazard area, regulatory floodway, habitat conservation plan, habitat for protected special status species, conservation easement.

The project site is not located within a coastal zone, farmland, wetlands (as defined by USFW), hazardous waste site listed pursuant to PRC 65962.5, earthquake fault zone, special flood plain, floodway, habitat conservation plan, habitat for protected special status species, or conservation easement.

The projects site is located within a designated VHFHSZ but qualifies for the CEQA exemption if the project has adopted fire hazard mitigation measures pursuant to existing building standards or state fire mitigation measures applicable to the development, including, but not limited to, standards established under all of the following:

- Public Resources Code Section 4291 or Government Code Section 51182.
- Public Resources Code Section 4290.
- California Building Code Chapter 7A.

(f) Not demolishing designated historic resource (designated before preliminary application).

The original intact illuminated "BOWL" pylon sign at the building #1 roof was found to be locally eligible as a City HCM under Criterion 1 as an extant example of a 1958 pylon sign associated with the automobile-oriented commercial growth of Los Angeles. While all non-historic buildings are proposed to be demolished for construction of new multi-story mixed use residential and commercial buildings, the BOWL sign would be removed, rehabilitated, stored, and reinstalled at its current location (proposed project). For the reasons presented in the report, the proposed project is found to conform with the *Secretary's Standards*. A historic resource assessment prepared by Chattel, Inc. | Historic Preservation Consultants, dated April 28, 2022 (revised on June 27, 2024 and January 21, 2025), was reviewed by Office of Historic Resources (OHR) on October 29, 2025 and has found the structure on-site is not a historic resource and the project will not result in any impacts to a historical resource. Based on this, the project will not result in a substantial adverse change to the significance of a historic resource and this exception does not apply.

(g) No portion of the prcject is for hotel, motel, other transient lodging (not including residential hotel or resident use as short-term lodging).

No portion of the Project shall be used for hotel, motel, or other transient lodging.

PROCEDURAL CRITERIA

(a) Tribal Notification/Consultation

The City has met the tribal notification and consultation requirement as evidenced in the case file. This includes the City providing formal notification via certified mail to each California Native American Tribe that is traditionally and culturally affiliated with the project as an invitation to consult on the proposed project, its location, and the project's potential effects on tribal cultural resources. Additionally, this includes adhering to the requisite number of days for a tribe to request consultation and to accept the invitation to consult, and the City to initiate and close consultation.

(b) As a condition of approval, the applicant will be required to submit a Phase 1 Environmental Site Assessment (ESA) to identify any potential exposures to hazardous conditions. If necessary, mitigated to current federal and state standards.

As part of City Planning written approval, the project will be conditioned to provide a Phase 1 Environmental Site Assessment (ESA) prior to any building permit issuance. If any hazardous conditions are found, proper mitigation to current federal and state standards will be required.

(c) Freeway – Additional Conditions of Approval for Prcjects within 500 feet of a Freeway.

The subject site is not within 500 feet of a freeway and therefore, this condition does not apply.

DUDEK
MAIN OFFICE
605 THIRD STREET
ENCINITAS, CALIFORNIA 92024
T 800.450.1818 F 760.632.0164

TECHNICAL MEMORANDUM

To:	Jonathan Genton, Genton Cockrum Partners
From:	Dudek Fire Protection Planning Team, Austin Ott and Rob Ball
Subject:	Riverwalk at Studio City Due Diligence Assessment
Date:	September 26, 2025
Attachment(s):	Figure 1 – Fire Hazard Severity Zones
	Figure 2 – Fire History
	Attachment 1 – Fire Flow Report
	Attachment 2 – Plant Selection Guidelines

Introduction

Dudek was commissioned by Genton Cockrum Partners to provide a due diligence technical assessment of the Riverwalk at Studio City project (Project). This assessment provides a review of the related fire code requirements for the Project and the Project site, inclusive of fire apparatus access, water supply, and defensible space for wildfire protection. This analysis will confirm compliance with the applicable fire codes and, where such is the case, identify any non-complying aspects of the Project and provide recommendations for addressing or correcting the Project element of concern.

The Project proposes to repurpose 6.01 acres on the northwest corner of Ventura Blvd. and Whitsett Avenue bounded by Ventura Blvd. to the southwest, Whitsett Avenue to the east, Valleyheart Drive to the northeast, and the San Fernando Valley Condos to the northwest. The Project site is currently developed with four commercial and retail buildings. The Project proposes a mixed-use development consisting of 814 residential apartment units and 75,968 square feet of commercial space. Buildings proposed for the Project include two-story restaurants and seven-story residential buildings constructed over subterranean parking. Overall building height to the roof of the residential buildings, measured in accordance with the adopted fire code, is approximately 71 feet above grade with the highest occupiable floor approximately 60 feet above grade. The Project site includes plazas, courtyards, pool and deck areas, and pedestrian access to the Los Angeles River. The construction types for the Project are Type 3 for the residential units over Type 1 for the garages.[1]

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). *Figure 1 – Fire Hazard Severity Zones* shows the Project site relative to the designated fire hazard severity zones. The Santa Monica Mountains to the south of the Project site are the primary wildfire hazard area. As shown in *Figure 2 – Fire History*, the Santa Monica

[1] Riverwalk at Studio City. Project plan set.

Mountains have an extensive wildfire history, however none of the recorded fires have burned onto the Project site, and the most recent fire near the Project site was in 1963, likely prior to development of the area. A CAL FIRE designation as a fire hazard severity zone does not indicate that an area is not safe for development. Rather, a fire hazard severity zone designation indicates that specific fire protection features that minimize structure vulnerability to a wildfire event will be required. The Los Angeles Fire Department (LAFD) is the fire authority having jurisdiction for the Project site.

1 Regulatory Analysis

The development of the Project is regulated by adopted legislation, codes, and standards. The regulatory environment has been shaped by post-fire analysis and controlled laboratory research. The applicable codes are discussed in this section. The Project is also affected by Assembly Bill 130, the recent state budget trailer bill that provides a new statutory exemption from the California Environmental Quality Act (CEQA) for certain urban infill housing development projects.

1.1 Los Angeles Building Code

The City has adopted the 2023 Los Angeles Building Code, which is a combination of the 2022 California Building Code with City of Los Angeles amendments. Chapter 7A of the Building Code contains the materials and construction methods for exterior wildfire exposure. The purpose of Chapter 7A is to establish minimum standards for the protection of life and property by increasing the ability of a building located in any fire hazard severity zone to resist the intrusion of flames or burning embers projected by a vegetation fire and to contribute to a systematic reduction in conflagration losses. The construction requirements in Chapter 7A are applicable to the Project due to its location in a designated LRA VHFHSZ.

1.2 Los Angeles Fire Code

The City of Los Angeles has also adopted the 2023 Los Angeles Fire Code, which is a combination of the 2022 California Fire Code with City of Los Angeles amendments. Chapter 5 of the Fire Code contains the basic provisions for fire apparatus access and water supply. Chapter 49 of the Fire Code contains the fire safety requirements for wildland-urban interface fire areas and fire hazard severity zones, which include requirements for fire protection plans and vegetation fuel modification and management. Appendix D of the Fire Code contains more specific requirements for fire apparatus access than Chapter 5 of the Fire Code. The appendix is not part of the Fire Code unless it is specifically adopted by the local fire agency. LAFD has adopted Appendix D with amendments.

1.3 Government Code 51182

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.

1.4 Public Resources Code 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.

1.5 Public Resources Code 4291

Public Resources Code Section 4291 (PC 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.

1.6 Assembly Bill 130

Assembly Bill 130 (AB 130) is one of two trailer bills that were attached to the recent state budget adoption that revised the California Environmental Quality Act (CEQA) to add statutory exemptions for certain types of projects, including housing projects. Specifically, AB 130 includes Public Resources Code section 21080.66, which establishes a new statutory exemption for qualifying housing development projects that are 20 acres or less in size and meet other specific criteria.

One of the new CEQA statutory exemptions allowed by AB 130 is an infill exemption. This provision exempts urban infill projects of up to 20 acres, which have a substantial housing component to the project, from CEQA review if the project meets several criteria. The legislation updated Government Code Section 65913.4, which excludes projects from this exemption if the project is located in within a LRA VHFHSZ, as determined by CAL FIRE pursuant to Government Code Section 51178, or within the SRA, as defined in Public Resources Code Section 4102.

However, projects in a designated SRA or LRA VHFHSZ do qualify for the CEQA exemption if the project has adopted fire hazard mitigation measures pursuant to existing building standards or state fire mitigation measures applicable to the development, including, but not limited to, standards established under all of the following:

- Public Resources Code Section 4291 or Government Code Section 51182.
- Public Resources Code Section 4290.
- California Building Code Chapter 7A.

1.7 Regulatory Compliance

Los Angeles Municipal Code Chapter 5, Article 7, Section 57 formally adopts amended versions of the California Building and Fire Codes and includes the provisions of PRC 4290 and 4291 along with the provisions of GC 51182.

The Project will be in compliance with the applicable provisions of Chapter 7A of the California Building Code, Chapter 49 of the California Fire Code, Sections 4290 and 4291 of the Public Resources Code, and Section 51182 of the Government Code. The Project qualifies for the infill housing project exemption from CEQA established by AB 130 and codified in Section 65913 of the Government Code.

2 Fire Access

Section 503 and Appendix D of the Fire Code contain the provisions that pertain to fire apparatus access. These provisions include the design specifications for fire apparatus access roads, additional requirements for aerial fire apparatus access, and the requirements for the locations of fire apparatus access roads relative to buildings.

2.1 Fire Apparatus Access Roads

The Fire Code requires fire apparatus access roads to be a minimum of 20 feet in width.[2] The fire apparatus access roads, also known as fire lanes, for this Project consist of Ventura Blvd., Whitsett Avenue, Valleyheart Drive, an on-site fire lane along the northwest boundary of the Project adjacent to Building 4, and an on-site fire lane approximately in the center of the Project between Building 2 and Building 3 that connects with both Ventura Blvd. and Valleyheart Drive. **All the designated fire apparatus access roads meet the minimum width requirement of 20 feet.**

Where parallel parking is allowed on either side of a fire lane, the width of the fire lane is required to be increased by 8 feet for each parking lane.[3] Ventura Blvd., Whitsett Avenue, and Valleyheart Drive meet this requirement. Ventura Blvd. is 70 feet wide with parking allowed on both sides of the street, Whitsett Avenue is 64 feet wide with parking prohibited adjacent to the Project site, and Valleyheart Drive is 28 feet wide with parking limited to the east side of the street only. Parking is not proposed for either side of the on-site fire lanes. **All fire apparatus access roads meet the minimum width requirement when parking is allowed.**

Fire apparatus access roads are also required to have a clear vertical height of not less than 13 feet 6 inches.[4] All the fire apparatus access roads can achieve this required vertical clearance. Landscaping plans show proposed trees adjacent to the on-site fire lanes. The landscape architect is encouraged to coordinate with the fire department on the species and exact installation location of the trees to minimize encroachment of the tree canopies into the vertical clearance of the fire lanes. **Regular maintenance of the trees will be required to prevent tree canopy growth into the width and height specifications of the fire lanes.**

Fire apparatus access roads are required to have a surface that allows all-weather drivability.[5] Appendix D states that surfaces of fire lanes are to be asphalt, concrete, or other approved driving surface capable of supporting the

[2] Los Angeles Fire Code Section 503.
[3] Los Angeles Fire Code Section 503.
[4] Ibid
[5] Ibid

imposed load of fire apparatus weighing up to 75,000 pounds.[6] The two on-site fire lanes are proposed to have a surface of turf block and artificial turf. Some fire departments consider turf block to be an alternative surface. **Specific approval from LAFD will be needed to use turf block with artificial turf as the surface for the on-site fire lanes.**

Dead-end fire apparatus access roads in excess of 150 feet in length are required to be provided with an approved turnaround.[7] Valleyheart Drive is currently identified as a dead-end road. However, the Project proposes to connect Valleyheart Drive with the two on-site fire lanes. Connecting Valleyheart Drive with the northwest fire lane creates through access for emergency vehicles. **None of the fire apparatus access roads are dead-end roads.**

2.2 Aerial Fire Apparatus Access

Where the vertical distance between the grade plane and the highest roof surface exceeds 30 feet, the Fire Code requires an approved aerial fire apparatus access road to be provided. As previously noted, the roofs of the residential buildings are approximately 71 feet above the grade plane. As such, the Project is required to provide conforming aerial fire apparatus access. An aerial fire apparatus access road is required to be a minimum of 28 feet in width.[8] Additionally, the aerial fire apparatus access road is required to have the edge nearest to the building located 15-30 feet from the building in order to allow for articulation of the aerial ladder and deployment with safe climbing angles.[9] Ventura Blvd. can serve as the required aerial fire apparatus access road. All buildings are set back approximately 21 feet from Ventura Blvd., which in within the 15-30-foot setback range required for an aerial fire apparatus access road. The 70-foot width of Ventura Blvd. exceeds the minimum 28-foot width requirement for an aerial fire apparatus access road. **Ventura Blvd. meets the requirements of an aerial fire apparatus access road for all of the buildings proposed by the Project.**

2.3 Proximity to Buildings

Approved fire apparatus access roads are required to be provided for every building. One or more fire apparatus access roads are required to extend to within 150 feet of all portions of the facility and all portions of the exterior walls of the first story of the building as measured by an approved route around the exterior of the building.[10] This is known as the hose pull requirement. Access to within 150 feet of all portions of the exterior walls of the first story ensures that firefighters are able to extend pre-connected hose lines completely around buildings. There is an exception that allows the fire code official to increase the maximum allowable distance when a structure is equipped with Fire Sprinklers, such as the Project.

A hose pull analysis was completed for this assessment. All portions of the exterior walls of the first story of all the proposed buildings are within 150 feet of a fire apparatus access road except for two small portions. There is a 17-foot gap in the courtyard of Building 2 and a 28-foot gap in the courtyard of Building 4. **It is anticipated that these hose pull gaps will be acceptable to LAFD given the various systems that will be included in this Project, specifically automatic fire sprinklers and standpipes, which allow the fire code official to grant the aforementioned determination.**

[6] Los Angeles Fire Code Appendix D
[7] Los Angeles Fire Code Section 503
[8] Ibid
[9] Los Angeles Fire Code Appendix D
[10] Los Angeles Fire Code Section 503

3 Water Supply

Fire protection water supplies are required to be provided through a system of water sources, water mains, and fire hydrants that are capable of providing the required fire flow. Fire flow is typically based on the type of construction and the size of the building requiring fire protection. The Los Angeles Fire Code has water supply requirements based on the type of land development.

3.1 Fire Flow

The Project, while primarily residential, is located in an industrial and commercial land use zone. The City of Los Angeles Fire Code requires a fire flow of 6,000 to 9,000 gallons per minute (gpm) for industrial and commercial land use zones.[11] An *Information of Fire Flow Availability* report provided by the Los Angeles Department of Water and Power for the Project indicates that the water supply system can provide a total of 9,000 gpm at the Project site (*Attachment 1*). **Attachment 1 confirms that the required fire flow for the Project will be met by the Los Angeles Department of Water and Power.**

3.2 Fire Hydrants

In addition to providing 9,000 gallons of water per minute, the LAFD also requires the fire flow to be provided by a minimum of six project-adjacent fire hydrants all flowing water simultaneously.[12] The *Information of Fire Flow Availability* report identifies six existing fire hydrants on Ventura Blvd. between Whitsett Avenue and the northwest on-site fire lane adjacent to and across the street from the Project site. The fire flow report confirms that each fire hydrant can flow 1,500 gpm for a total of 9,000 gpm when all fire hydrants are flowing simultaneously. **The required number of fire hydrants currently exists within the proximity to the Project required by the LAFD.**

4 Defensible Space and Vegetation Management

As previously mentioned, the Project is located in a designated Very High Fire Hazard Severity Zone (VHFHSZ). As such, the Project is required to provide defensible space vegetation management that complies with LAFD requirements. For projects in urban areas surrounded by existing development, vegetative fuel management is generally accomplished through a landscaping plan that complies with defensible space fuel management zone (FMZ) requirements.

4.1 Fuel Management Zones

The LAFD requires 200 feet of managed vegetative fuel for projects located in a fire hazard severity zone. The distance is measured from the edges of buildings outward and is divided into two fuel management zones, each of which is 100 feet in width. The first 100 feet of vegetation fuel management is further divided into three zones. An ember-resistant zone is the first five feet adjacent to a structure. Zone A extends 5 to 30 feet from the structure and Zone B extends 30 to 100 feet from the structure.

[11] Los Angeles Fire Code Section 507
[12] Ibid

The Project is infill and does not have any direct interface with wildland vegetative fuels. The nearest wildland area is approximately 1,500 feet from the Project adjacent to the low-density residential development to the south. As such, the 200 feet of vegetative fuel management for this Project is provided by adjacent land uses including urban development, residential development, and the Los Angeles River to the northeast of the Project site. The remaining consideration with regard to vegetative fuels is the landscaping for the Project.[13] Given the distance the Project is located from the Santa Monica Mountains and the natural vegetation in which wildfires typically occur, the Project site is not at risk of being affected by the flames of a wildfire. However, embers produced by a wildfire event could be carried by prevailing on-shore winds or seasonal off-shore winds to the Project site. Embers are the primary ignition source of wildfire-related ignitions in landscaping vegetation.[14]

4.2 Ground-Level Landscaping

In fire hazard severity zones, the LAFD requires "landscape vegetation, including, but not limited to conifers (e.g. cedar, cypress, fir, juniper, and pine), eucalyptus, acacia, palm, and pampas grass [to be maintained] in such a condition as not to provide an available fuel supply to augment the spread or intensity of a fire."[15] In general, Chapter 49 of the Fire Code requires all new vegetation installed in a fire hazard severity zone to be fire-resistant.[16] The Fire Code provides several means of determining if plants, shrubs, and trees are classified as fire-resistant. The means include a book, journal, or listing, approved by the fire agency, that provides fire-resistance information about the species recommended for a climate zone; a report or finding, with justification, issued by a licensed landscape architect; or vegetation approved by and/or considered to be fire-resistant by the local fire agency.[17] Attachment 2 of this assessment contains the *Los Angeles City and County Plant Selection Guidelines by Zone* document. This information is provided to assist with determining which of the proposed plants, shrubs, and trees in the conceptual landscaping plans will be acceptable for landscaping in a fire hazard severity zone.

4.3 Rooftop Landscaping

In addition to ground-level landscaping, the Project proposes landscaping for the occupiable rooftops. The Fire Code does not specifically prohibit rooftop landscaping in fire hazard severity zones. Landscaping vegetation for rooftops is required to comply with defensible space vegetative fuel management provisions since the landscaping is within the designated fuel management zone for the building. As with ground-level landscaping, rooftop landscaping is required to be selected and maintained such that the landscaping does not provide an available fuel supply to augment the spread or intensity of a fire.

More specifically, the Fire Code limits rooftop landscaped areas to a maximum of 15,625 square feet with the longest side of the area not exceeding 125 feet. Multiple rooftop landscaped areas are required to be separated by at least 6 linear feet.[18] Rooftop landscaping is required to be provided with supplemental irrigation to ensure that plants remain hydrated sufficiently to remain healthy and minimize dry foliage. In keeping with the state's

[13] Los Angeles Fire Code Section 322
[14] National Fire Protection Association. 2025. *How Do Homes Burn in a Wildfire?* https://www.nfpa.org/videos/how-do-homes-burn-in-a-wildfire
[15] Los Angeles Fire Code Section 4906
[16] Ibid
[17] Ibid
[18] Los Angeles Fire Code. Section 317

requirement for an ember-resistant zone around structures, it is recommended that rooftop landscaping is not located within 5 feet of walls that extend above the occupiable and landscaped rooftop area.

4.4 Trees

Trees receive special consideration as part of the landscaping for projects in fire hazard severity zones. Trees are desirable in the urban environment to help reduce the heat island effect of development, to provide shade to help reduce the use of energy to cool buildings, and to improve quality of life.[19] In general, new fire-resistant trees installed in fire hazard severity zones are required to be planted such that the tree's drip line or canopy perimeter at maturity is at least 10 feet from buildings.

Trees that are not fire-resistant, such as conifers, palms, pepper trees, and eucalyptus species are required to be installed such that their drip lines or canopy perimeters at maturity are 30 feet from buildings. Given the siting and massing of the proposed buildings for this Project, there are very limited locations within the Project site that would accommodate non-fire-resistive trees whose drip lines will be 30 feet from the buildings at maturity. The LAFD gives special attention to palm trees given their known ignitability from airborne embers and their propensity for large volume and large size ember production once ignited. LAFD notes,

> Many palm species are known to be receptive to embers and once ignited, difficult to extinguish. Poorly maintained palms present an even greater hazard in the amount of ember production as well as the size and distance they can travel during wind driven wildfires. Size of the embers can vary from small masses of fibers to entire fronds. What we have learned about the dangers of embers and the distance they can travel suggests we should avoid using palms in known fire hazard severity zones.[20]

The existing landscaping on the Project site includes numerous palm species. The Project proposes to retain many Mexican Fan Palm trees. According to the *Los Angeles City and County Plant Selection Guidelines by Zone* document, Mexican Fan Palm trees are not allowed in Fuel Modification Zone A, which is the zone that is 5 to 30 feet from a structure. With regard to palm trees, the LAFD offers the following guidance:

> There are hundreds of palm species in cultivation, however, it is impractical to identify each one and their appropriate planting location. Fuel Modification Plan Checkers will evaluate each plan according to the Plant Selection Guidelines [Attachment 1] considering density and arrangement first, then species selection and location in relation to the structure second.[21]

4.5 Vegetation Management Summary

The landscaping plans prepared for the Project include a selection of trees and shrubs that are on the approved plant list that is included in the *Los Angeles City and County Plant Selection Guidelines by Zone* document. Trees selected can be located with regard to the buildings such that they meet the spacing and distance requirements for Zone A fuel modification. Shrubs selected provide a variety of options to comply with requirements for location, height, groupings, and spacing. Review of the landscaping plans by LAFD will provide the necessary guidance for

[19] California ReLeaf. 2025. *Benefits of Urban Trees*. https://californiareleaf.org/resources/benefits-of-trees/
[20] LAFD. 2025. *Palms, Wildfires, and AB 3074*. https://lafd.org/palms-and-wildfires-and-ab3074
[21] LAFD. 2025. *Palms, Wildfires, and AB 3074*. https://lafd.org/palms-and-wildfires-and-ab3074

retention of existing trees; species and placement of new trees; and species, spacing, and grouping of shrubs. The Project is required to comply with LAFD's requirements through the plan review process.

5 Plans

Like many southern California fire agencies, LAFD will generally require a fire protection plan for projects located in a fire hazard severity zone per section 4903 of the LAFC. Fire protection plans are project-specific, comprehensive documents that review and analyze relevant fire protection and safety codes, regulations, and standards with the intent to describe and prescribe ways to minimize and mitigate potential for loss from a wildfire exposure. Fire protection plans generally include vegetative fuel modification plans and/or detailed landscaping plans. If desired, Dudek can prepare a comprehensive fire protection plan for the Project that thoroughly evaluates all wildfire related factors, including the emergency response capacities of nearby fire stations, along with the Project's compliance with all applicable codes, regulations, and standards.

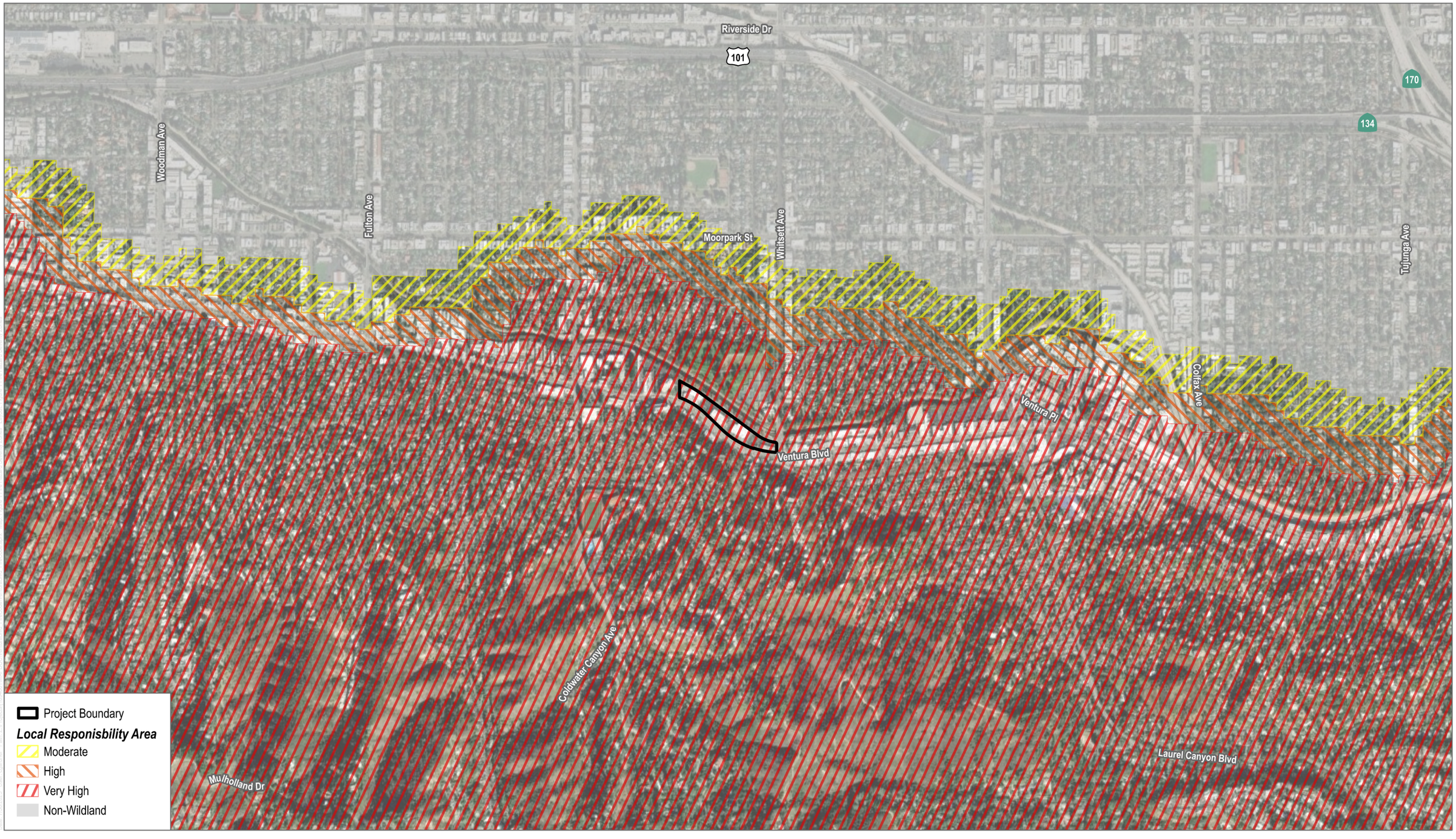
Conclusion

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. Approval of LAFD is needed to accept two small hose pull gaps and the surfacing of two on-site fire lanes with turf block and artificial turf. It is expected that the minor hose pull deficiencies will be approved.

The 200 feet of defensible space required by the fact that the Project is in a designated fire hazard severity zone is provided by the existing adjacent urban development and the Los Angeles River. 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. An analysis of the proposed landscaping is included with this report. 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.

LAFD may require the submittal of a comprehensive fire protection plan for the Project. Should a fire protection plan be required, Dudek staff can complete a complying report.



SOURCE: Esri World Imagery; CalFire 2025

DUDEK

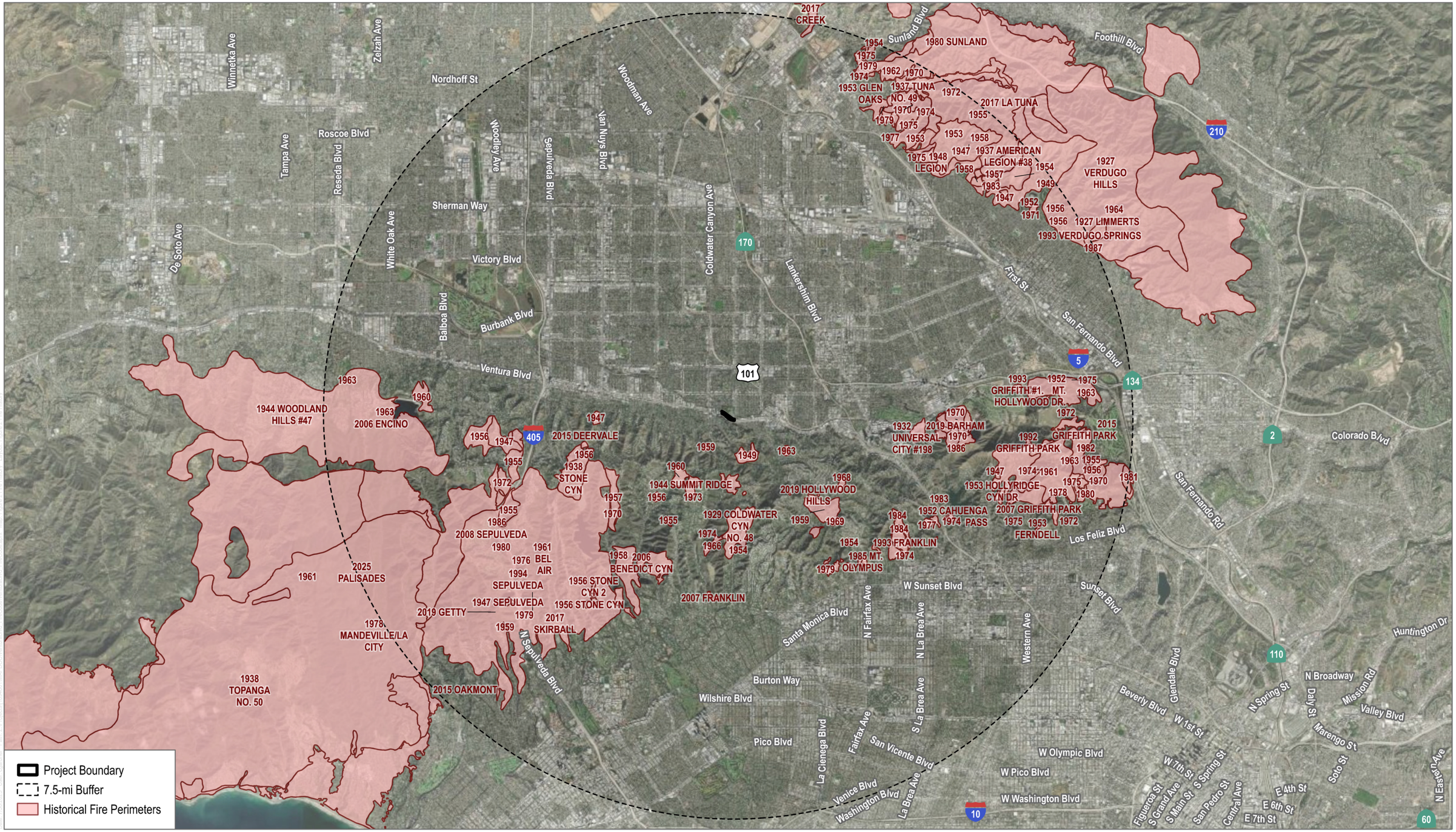
N

0 500 1,000 Feet

FIGURE 1

Fire Hazard Severity Zones

Riverwalk at Studio City



SOURCE: Esri World Imagery; Open Street Maps 2019; CalFire 2025

DUDEK

0 4,000 8,000 Feet

FIGURE 2

Fire History

Riverwalk at Studio City

City of Los Angeles
Los Angeles Department of Water and Power - Water System

INFORMATION OF FIRE FLOW AVAILABILITY

LAFD Fire Flow Requirement: 9,000 GPM 6 hydrants flowing simultaneously

Water Service Map No.: 164-165\164-162

LAFD Signature: _____

Date Signed: _____

Applicant: Ismael Pablo

Company Name: Psomas

Address: 865 South Figueroa St Los Angeles,CA 90017

Telephone: (213)-223-1496

Email Address: ismael.pablo@psomas.com

	F- 73713	F- 66720	F- 63981
Location:	Located in the Northwest corner of Ventura Blvd. and Whitsett Ave.	Located on the North side of Ventura Blvd., 500' West of Whittset Ave. CL	Located on the North side of Ventura Blvd., 900' West of Whittset Ave. CL
Distance from Neareast Pipe Location (feet):	24.5 ft	21.5 ft	21.5 ft
Hydrant Size:	2 1/2 X 4D	2 1/2 X 4D	2 1/2 X 4D
Water Main Size (in):	12 in	12 in	12 in
Static Pressure (psi):	138 psi	140 psi	139 psi
Residual Pressure (psi):	118 psi	118 psi	117 psi
Flow at 20 psi (gpm):	1500 gpm	1500 gpm	1500 gpm

NOTE: Data obtained from hydraulic analysis using peak hour.

W20250326021

Remarks: 6

ECMR No. _____

Run a scenario for ~~4~~ hydrants flowing simultaneously at 9,000 gpm.

Water Purveyor: **Los Angeles Department of Water & Power** *Date:* 4/29/2025

Signtature: _____ *Title:* Civil Engineering Associate II

Requests must be made by submitting this completed application, along with a $271.00 check payable to:
"Los Angeles Department of Water and Power", and mailed to:
Los Angeles Department of Water and Power
Distribution Engineering Section - Water
Attn: Business Arrangements
111 North Hoe Street - Room 1425
Los Angeles, CA 90012

*** If you have any questions, please contact us at (213) 367-2WNB or visit our web site at http://www.ladwp.com.**

City of Los Angeles
Los Angeles Department of Water and Power - Water System

INFORMATION OF FIRE FLOW AVAILABILITY

LAFD Fire Flow Requirement: 9,000 GPM 6 hydrants flowing simultaneously

Water Service Map No.: 164-165\164-162

LAFD Signature: _____

Date Signed: _____

Applicant: Ismael Pablo

Company Name: Psomas

Address: 865 South Figueroa St Los Angeles,CA 90017

Telephone: (213)-223-1496

Email Address: ismael.pablo@psomas.com

	F- 73711	F- 75959	F- 50644
Location:	Located on the North side of Ventura Blvd., 1444' West of Whittset Ave. CL	Located on the South side of Ventura Blvd., 830' West of Whittset Ave. CL	Located on the South side of Ventura Blvd., 1125' West of Whittset Ave. CL
Distance from Neareast Pipe Location (feet):	22 ft	22 ft	22 ft
Hydrant Size:	2 1/2 X 4D	2 1/2 X 4D	2 1/2 X 4D
Water Main Size (in):	12 in	12 in	12 in
Static Pressure (psi):	138 psi	140 psi	139 psi
Residual Pressure (psi):	118 psi	116 psi	117 psi
Flow at 20 psi (gpm):	1500 gpm	1500 gpm	1500 gpm

NOTE: Data obtained from hydraulic analysis using peak hour.

Remarks: Run a scenario for ~~4~~ 6 hydrants flowing simultaneously at 9,000 gpm.

ECMR No. W20250326021

Water Purveyor: **Los Angeles Department of Water & Power** *Date:* 4/29/2025

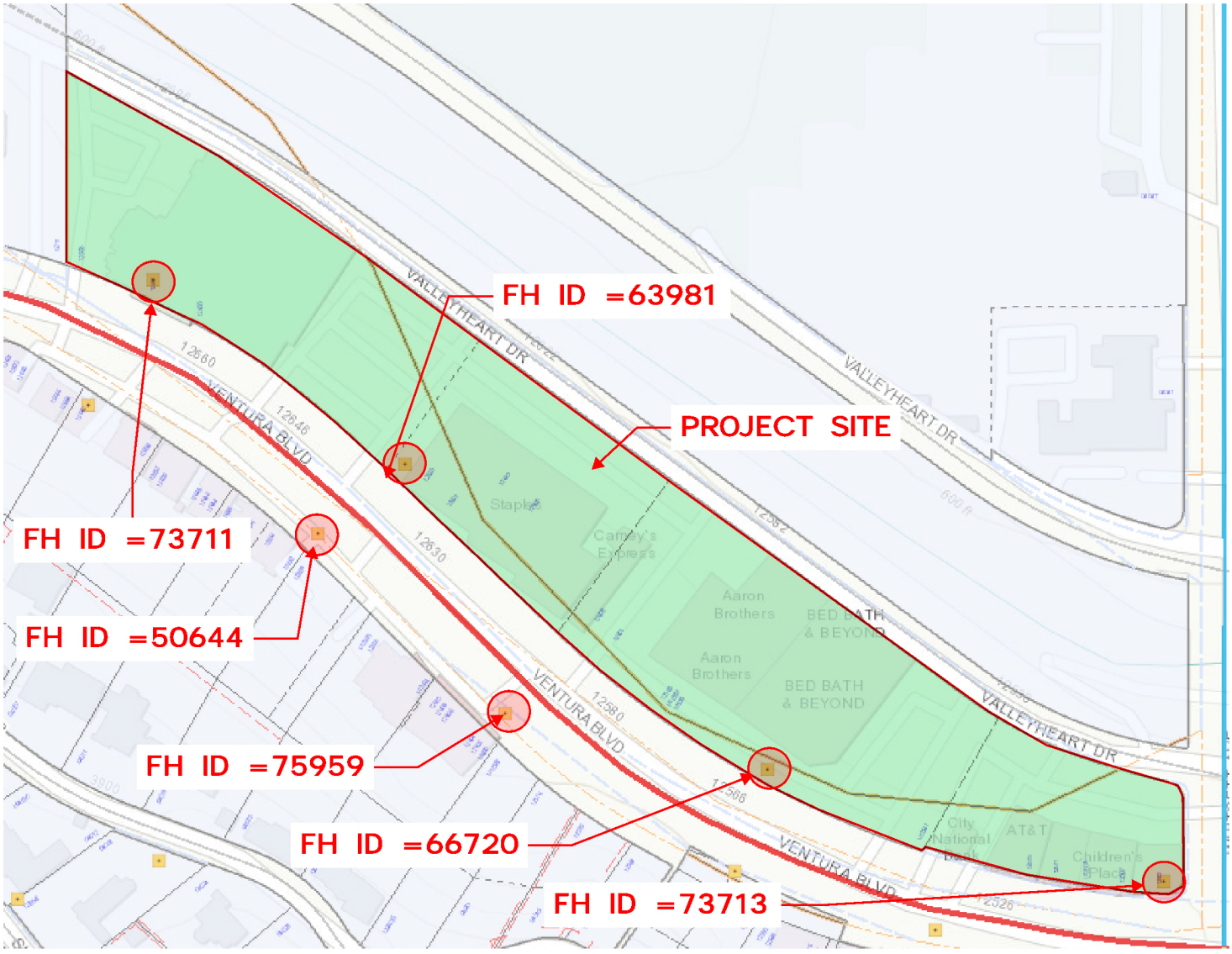
Signtature: _____ *Title:* Civil Engineering Associate II

Requests must be made by submitting this completed application, along with a $271.00 check payable to:
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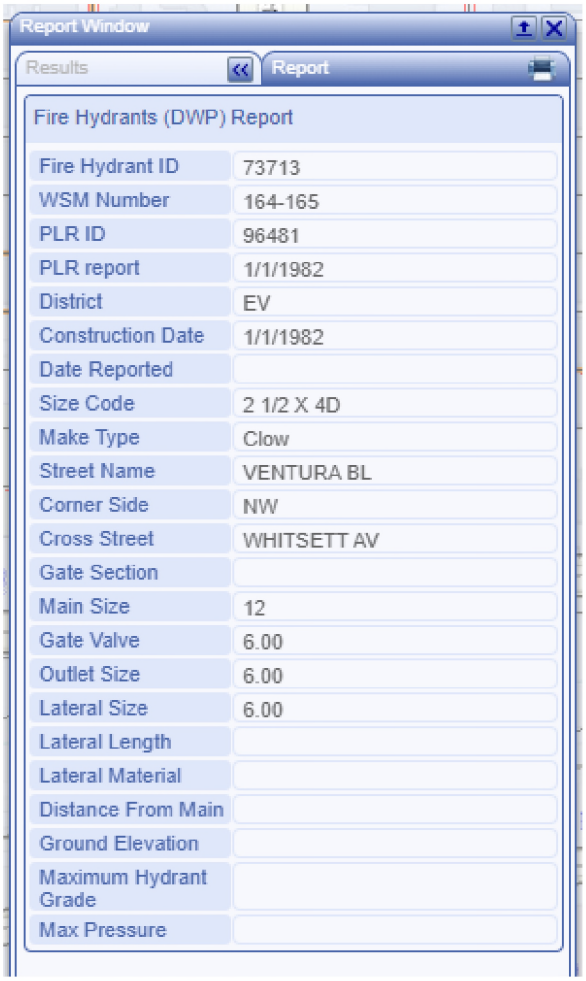
*** If you have any questions, please contact us at (213) 367-2WNB or visit our web site at http://www.ladwp.com.**

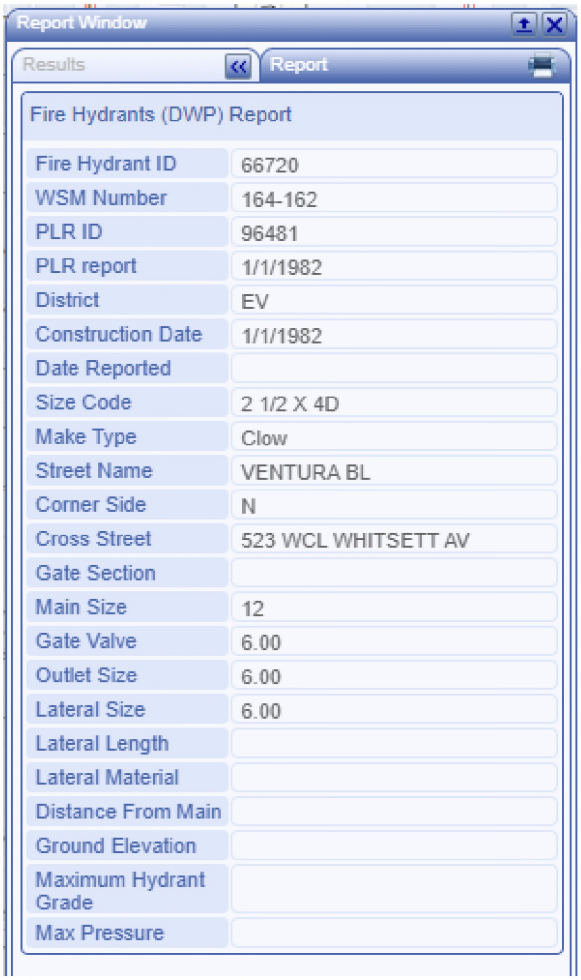
TABLE 57.507.3.1
FIRE-FLOW BY TYPE OF LAND DEVELOPMENT

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).

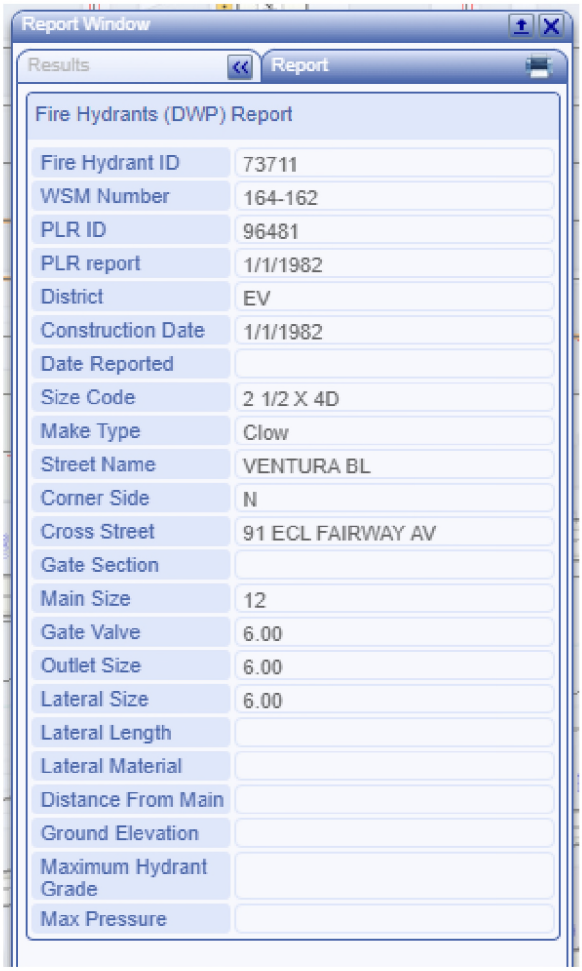


POTENTIAL FIRE HYDRANTS


Report Window
Results
Report
Fire Hydrants (DWP) Report
Fire Hydrant ID 73713
WSM Number 164-165
PLR ID 96481
PLR report 1/1/1982
District EV
Construction Date 1/1/1982
Date Reported
Size Code 2 1/2 X 4D
Make Type Clow
Street Name VENTURA BL
Corner Side NW
Cross Street WHITSETT AV
Gate Section
Main Size 12
Gate Valve 6.00
Outlet Size 6.00
Lateral Size 6.00
Lateral Length
Lateral Material
Distance From Main
Ground Elevation
Maximum Hydrant Grade
Max Pressure


Report Window
Results
Report
Fire Hydrants (DWP) Report
Fire Hydrant ID 66720
WSM Number 164-162
PLR ID 96481
PLR report 1/1/1982
District EV
Construction Date 1/1/1982
Date Reported
Size Code 2 1/2 X 4D
Make Type Clow
Street Name VENTURA BL
Corner Side N
Cross Street 523 WCL WHITSETT AV
Gate Section
Main Size 12
Gate Valve 6.00
Outlet Size 6.00
Lateral Size 6.00
Lateral Length
Lateral Material
Distance From Main
Ground Elevation
Maximum Hydrant Grade
Max Pressure


Report Window
Results
Report
Fire Hydrants (DWP) Report
Fire Hydrant ID 63981
WSM Number 164-162
PLR ID 96481
PLR report 1/1/1982
District EV
Construction Date 1/1/1982
Date Reported
Size Code 2 1/2 X 4D
Make Type Clow
Street Name VENTURA BL
Corner Side N
Cross Street 404 ECL FAIRWAY AV
Gate Section
Main Size 12
Gate Valve 6.00
Outlet Size 6.00
Lateral Size 6.00
Lateral Length
Lateral Material
Distance From Main
Ground Elevation
Maximum Hydrant Grade
Max Pressure


Report Window
Results
Report
Fire Hydrants (DWP) Report
Fire Hydrant ID 73711
WSM Number 164-162
PLR ID 96481
PLR report 1/1/1982
District EV
Construction Date 1/1/1982
Date Reported
Size Code 2 1/2 X 4D
Make Type Clow
Street Name VENTURA BL
Corner Side N
Cross Street 91 ECL FAIRWAY AV
Gate Section
Main Size 12
Gate Valve 6.00
Outlet Size 6.00
Lateral Size 6.00
Lateral Length
Lateral Material
Distance From Main
Ground Elevation
Maximum Hydrant Grade
Max Pressure


Report Window
Results
Report
Fire Hydrants (DWP) Report
Fire Hydrant ID 75959
WSM Number 164-162
PLR ID 102598
PLR report 11/9/1995
District EV
Construction Date 11/9/1995
Date Reported
Size Code 2 1/2 X 4D
Make Type Clow
Street Name VENTURA BLVD
Corner Side S
Cross Street 655'ECL FAIRWAY AVE
Gate Section 165-162
Main Size 12
Gate Valve 6.00
Outlet Size 6.00
Lateral Size 6.00
Lateral Length
Lateral Material
Distance From Main
Ground Elevation
Maximum Hydrant Grade
Max Pressure


Report Window
Results
Report
Fire Hydrants (DWP) Report
Fire Hydrant ID 50844
WSM Number 164-162
PLR ID 102598
PLR report 11/9/1995
District EV
Construction Date 11/9/1995
Date Reported
Size Code 2 1/2 X 4D
Make Type Clow
Street Name VENTURA BLVD
Corner Side S
Cross Street 357'ECL FAIRWAY AVE
Gate Section 165-162
Main Size 12
Gate Valve 6.00
Outlet Size 6.00
Lateral Size 6.00
Lateral Length
Lateral Material
Distance From Main
Ground Elevation
Maximum Hydrant Grade
Max Pressure

Plant Selection Guidelines by Zone

Fuel Modification plant selection and location should focus on the density and arrangement of plants related to structures. Second, choose zone appropriate species based on plant characteristics such as moisture content, resin/pitch and the production of dead litter from leaves, bark, seed pods etc. The following guidelines are intended to simplify this process through zone specific compositions.

Zone A (30' from any qualifying structure or the property line whichever is first)

- Zone A should be planted "lean" and selections should consist of small herbaceous or succulent plants less than 2'-3' in height or regularly irrigated and mowed lawns.
- It is best not to use woody trees, shrubs and perennial species or masses of un-mowed grasses within 10 feet of the structure.
- Occasional accents of woody plants can be used sparingly to soften hard edges of structures if the selections are widely spaced and zone appropriate.
- Consider locating hardscape features such as walkways, patios, driveways, sport courts etc. adjacent to the structure itself. Potted plants can be used to soften walls if necessary.

Zone B (30'-100' from any qualifying structure)

- Zone B can be planted with a slightly higher density than Zone A. However, care should be taken not to create horizontal or vertical fuel ladders (see basic fire behavior graphics).
- Screen plantings can be used to hide unsightly views. Hedging is discouraged as it promotes the accumulation of dead litter inside the live hedge.
- Zone B is the ideal location to introduce larger shade trees provided they are zone appropriate and the canopies are not continuous.
- Avoid planting woody plant species larger than 3' at maturity directly beneath any tree canopy.

Zone C (100'-200' from any qualifying structure)

- Zone C often is not landscaped on many projects but is still subject to hazard reduction requirements (brush clearance). Do not denude the property. http://www.readyforwildfire.org/
- If Zone C is to be landscaped, avoid increasing plant density beyond guidelines for Zone B.

Adjacent to Access Roads

- Maintain Fire Access roads with a 20' wide path that remains clear to the sky.

Fuel Ladders/Basic Fire Behavior

Before selecting and locating plants on a Fuel Modification plan a basic understanding of wildland fire behavior is the key factor in properly arranging plants. Eliminating and avoiding the creation of fuel ladders should be the chief concern. Understanding that anything planted in the landscape can become receptive fuel for wildfire: the way it is arranged and maintained will greatly influence fire intensity. The following diagrams will aide in arranging plant compositions wisely.

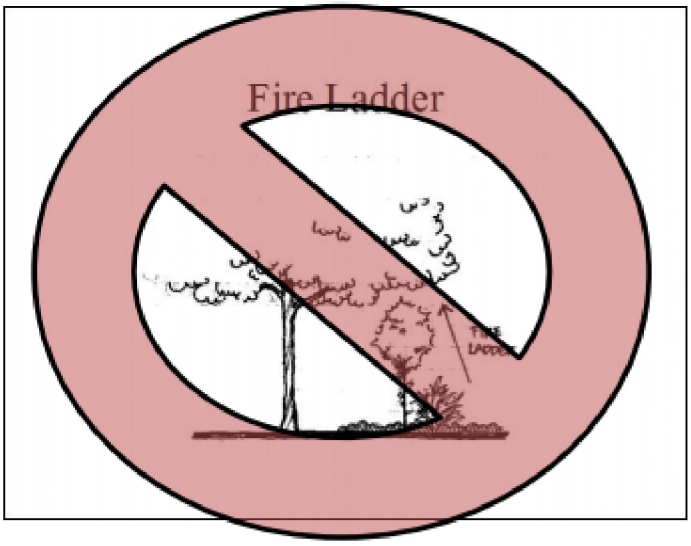


Figure 1: Fire Ladders or Fuel Ladders should be eliminated. The diagram above illustrates what not to do.



Figure 2: Eliminate the vertical and horizontal continuity. This is a good example of adequate separation.

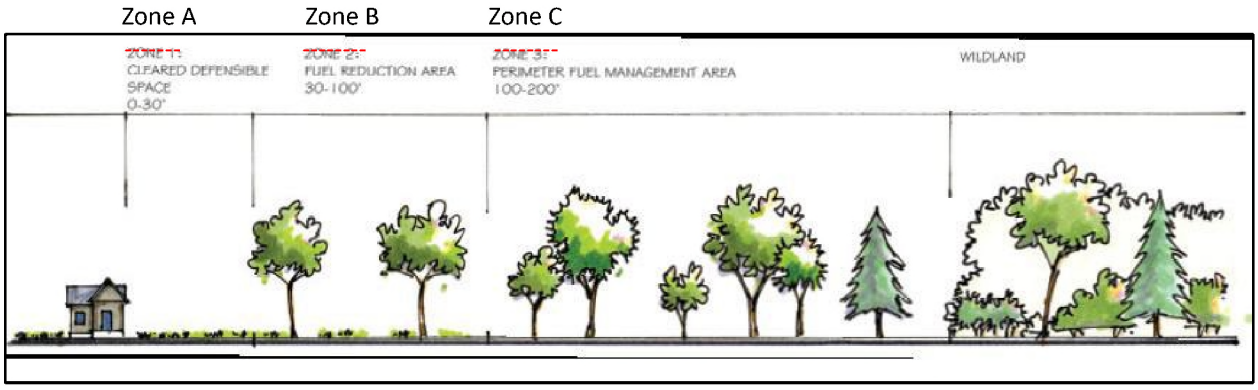


Figure 3: Note the progressive increase in density and arrangement moving away from the structure.

Plant Placement Do's

- Do: use "mass plantings" or herbaceous/succulents as ground covers even if they are not traditionally used as such. Mass plantings if properly selected, can eliminate fuel ladders.
- Do: plant using spacing resulting in near complete coverage at maturity.
- Do: consider using patio trees as an informal screen in Zone A.
- Do: consider vines as an alternative to hedges on walls or fences 10' from structures.
- Do: select varieties of plants that are slower growing and reach manageable sizes at maturity.
- Do: use plants that are appropriately scaled to the size of the property and structure. A single story house does not need to be shaded by a 100' tall Sweetgum.

Plant Placement Don'ts

- Don't plant hedges directly against structures. This includes espaliers of large shrubs not allowed in Zone A, or hedges taller than 6 feet or within 10' of the structure.
- Don't plant large shrubs and trees in continuous lines or large masses in Zones A or B.
- Don't plant at densities that result in an "instant landscape."
- Don't plant large species and use pruning to reduce overall size.
- Don't plant vines on structures. Vines become receptive fuel beds for embers (fire brands).
- Don't assume any plant is "fire proof." All plants will burn and assuming a plant is ignition resistant can be very misleading.
- Don't use large woody species in mass plantings.

Acceptable Plant Selections for Fuel Modification

The provided plant list is intended as a representative sample of plants appropriate for each zone, considering size, moisture content, leaf litter production and chemical composition. This list is not comprehensive, and designers may choose plants not on the list if plant characteristics are zone appropriate. Selecting regionally appropriate plants considering climate and microclimate adaptability is the designer's responsibility.

Undesirable Plants/Target Species

Plants listed below are not allowed as part of an approved Fuel Modification Plan. In addition to this list, designers should avoid planting known invasive plants such as Pampas grass and Hottentot Fig. If there are questions, please reference the California Invasive Plant Council.
http://www.cal-ipc.org/

*This list is not inclusive and some cultivars (dwarf etc.) within the genus listed may be acceptable.

Adenostoma fasciculatum – Chamise

Adenostoma sparsifolium – Red Shank

Artemesia californica – California Sagebrush

Eriogonum fasciculatum – Common Buckwheat

Cortaderia spp. – Pampas Grass

Cupressus spp. – Cypress

Eucalyptus spp – Eucalyptus

Jasminum humile – Italian Jasmine

Plumbago auriculata – Cape Plumbago

Tecoma capensis – Cape Honeysuckle

Example plant selections by zone begin on the next page.

Fuel Modification Plant List

Botanical Name	Common Name	Zone	Minimum distance from structure
Ground Cover			
Acacia redolens 'Desert Carpet'/'Low Boy'	Desert Carpet Acacia	B	30
Achillea tomentosa	Woolly Yarrow	A	
Ajuga reptans	Carpet Bugle	A	
Arctostaphylos (Prostrate Varieties)	Manzanita	B	
Artemisia californica (Cultivars)	Sagebrush - Prostrate Forms	B	30
Artemesia 'Powis Castle'	NCN	B	
Baccharis pilularis 'Pigeon Point'/'Twin Peaks'	Prostrate Coyote Brush	B	
Campanula poscharkyana	Serbian Bellflower	A	
Ceanothus gloriosus	Point Reyes Ceanothus	B	
Cerastium tomentosum	Snow-In-Summer	A	
Chamaemelum nobile	Chamomile	A	
Cistus salviifolius 'Prostratus'	Sageleaf Rockrose	B	
Coprosma kirkii	Mirror Plant	B	
Coreopsis auriculata 'Nana'	Tickseed	A	
Cotoneaster (Prostrate Varieties)	Cotoneaster	B	
Dalea greggii	Trailing Indigo Bush	B	
Delosperma alba	White Training Ice Plant	A	
Dichondra micrantha	Dichondra	A	
Drosanthemum floribundum	Rosea Ice Plant	A	
Duchesnea indica	Indian Mock Strawberry	A	
Dymondia margaretae	NCN	A	
Erigeron glaucus	Seaside Daisy	A	
E. karvinskianus	Santa Barbara Daisy	B	
Euonymus fortunei 'Colorata'	Purple-Leaf Winter Creeper	B	
Festuca cinerea(ovina'Glauca')	Blue Fescue	A	
F. rubra	Red Fescue	A	
Fragaria chiloensis	Wild Strawberrry	A	
Gazania Hybrids	Trailing Gazania	A	
Geranium incanum/sanguineum	Cranesbill	A	
Glechoma hederacea	Ground Ivy	A	
Helianthemum nummularium	Sunrose	A	
Herniaria glabra	Green Carpet	A	
Heuchera species and Cultivars	Coral Bells	A	
Hypericum calycinum/coris	Aaron's Beard	B	
Iberis sempervirens	Evergreen Candytuft	A	
Iva hayesiana	Poverty Weed	B	30
Juniperus (Prostrate species/cultivars)		B	
Laurentia fluviatilis	Blue Star Creeper	A	
Lysimachia nummularia	Moneywort	A	
Liriope spicata	Creeping Lily Turf	A	

Liriope muscari	Lily Turf	A	
Mahonia repens	Creeping Mahonia	B	
Myoporum 'Pacificum' & 'Putah Creek'	Pacific Myoporum	B	
M. parvifolium	NCN	A	
Oenothera berlandieri	Mexican Evening Primrose	B	
O. stubbei	Baja Evening Primrose	A	
Ophiopogon japonicus	Mondo Grass	A	
Pachysandra terminalis	Japanese Spurge	A	
Pelargonium peltatum/tomentosum	Ivy Geranium	A	
Persicaria capitata	Pink Clover	A	
Phlox subulata	Moss Pink	A	10
Phyla nodiflora (Lippia repens)	Lippia	A	
Potentilla tabernaemontanii	Spring Cinquefoil	A	
Ribes viburnifolium	Catalina Perfume	B	
Rosmarinus officinalis (Prostrate Varieties)	Prostrate Rosemary	B	30
Scaevola 'Mauve Clusters'	NCN	A	
Salvia sonomensis	Creeping Sage	B	
Sedum species	Stonecrops	A	
Senecio mandraliscae/serpens	Kleinia/Blue Chalksticks	A	
Soleirolia soleirolii	Baby's Tears	A	
Teucrium cossonii majoricum	Germander	A	
T. X lucidrys 'Prostratum'	Prostrate Germander	A	
Thymus species	Mother of Thyme	A	
Trachelospermum jasminoides	Star Jasmine	A	
Trifolium fragiferum	White Clover	A	
Verbena species (Prostrate Varities)	Garden Verbena	A	
Vinca minor	Dwarf Periwinkle	A	
Viola odorata	Sweet Violet	A	
Wedelia trilobata	Yellow Dot	B	
Zoysia tenuifolia	Korean Grass	A	
Miscellaneous Perennials, Grasses, Ferns etc.			
Acorous gramineous and Cultivars	Sweet Flag	A	
Agapanthus africanus	Lily of the Nile	A	
Alstroemeria cooperi	Peruvian Lily	A	
Armeria species	Thrifts	A	
Bamboos	Bamboo	B	30
Bergenia cordifolia	Heart Leaf Bergenia	A	
Cycas species	Cycads	A	
Cyrtomium falcatum	Holly Fern	A	
Davalia tricomanoides	Rabbits Foot Fern	A	
Epilobium canum	California Fuchia	B	
Helictotrichon sempervirens	Blue Oat Grass	A	15
Hemerocallis hybrids	Daylily	A	
Iris douglassiana	Coastal Iris	A	
Iris germanica	Bearded Iris	A	

Kalanchoe species	Kalanchoe	A	
Leymus condensatus 'Canyon Prince'	Canyon Prince Wild Rye	B	
Lobelia laxiflora		A	10
Pelargonium species	Geranium	A	
Penstemon species	Beard Tongue	A	
Plumeria	Plumeria	A	
Phlebodium aureum	Rabbits Foot Fern	A	
Tulbaghia violacea	Society Garlic	A	
Zephyranthes candida	Zephyr Lily	A	
Shrubs			
Abelia grandiflora (Prostrata)	Glossy Abelia	A	10
Abutilon hybridum	Flowering Maple	A	10
Acanthus mollis	Bear's Breech	A	
Agave species	Agave	A	
Aloe species	Aloe	A	
Alyogyne huegelii	Blue Hibiscus	A	10
Arbutus unedo (Dwarf Cultivars)	Dwarf Strawberry Tree	A	10
Arctostaphylos species	Manzanita	B	
Aucuba japonica	Japanese Aucuba	A	
Baccharis species	Various	B	
Berberis thunbergii	Japanese Barberry	B	
B. thunbergii ' prostrate cultivars'		A	10
Bougainvillea sp.	Bougainvillea	B	
Buddleja davidii	Butterfly Bush	B	
Buxus microphylla japonica	Japanese Boxwood	A	10
Caesalpinia (Shrub Forms)	Bird of Paradise Bush	A	10
Camellia species	Camellia	A	10
Calliandra californica/eriophylla	Baja Fairy Duster	B	
Callistemon citrinus	Lemon Bottlebrush	B	
C. viminalis "Little John"	NCN	A	10
Calycanthus occidentalis	Western Spice Bush	B	
Carissa macrocarpa and Cultivars	Natal Plum	A	10
Carpenteria californica	Bush Anemone	A	10
Cassia artemisioides	Feathery Cassia	A	30
Ceanothus species	Wild Lilac	B	30
Cercocarpus betuiloides	Mountain Mahogany	B	30
Choisya ternata	Mexican orange	B	
Cistus species	Rockrose	B	
Comarostaphylis diversifolia	Summer Holly	B	
Convolvulus cneorum	Bush Morning Glory	B	
Coprosma pumila/repens	Mirror Plant	B	
Cotoneaster species & cultivars	Cotoneaster	B	
Crassula species	NCN	A	
Cuphea hyssopifolia	False Heather	A	
Cycas revoluta	Sago Palm	A	

Dasylirion quadrangulatum/wheeleri	Mexican Grass Tree	A	10
Dendromecon harfordii	Island Bush Poppy	B	
Dietes bicolor/irioides	Fortnight Lily	A	
Dodonaea viscosa (Purpurea)	Hopseed Bush	B	
Elaeagnus pungens & cultivars	Silverberry	B	
Encelia californica	Coast Sunflower	A	10
E. farinosa	Brittle Bush	B	
Erigonum giganteum	St. Catherine's Lace	B	
Escallonia species	Escallonia	A	10
Euonymus japonica & cultivars	Evergreen Euonymus	A	10
Euphorbia species		A	
Euryops pectinatus	NCN	A	
Fatsia japonica	Japanese Aralia	A	
Fouquieria splendens	Ocotillo	A	
Fremontodendron species & cultivars	Flannel Bush	B	
Gardenia jasminoides	Gardenia	A	
Garrya elliptica	Coast Silktassel	B	
Grevillea species & cultivars	Grevillea	B	
Grewia occidentalis	Lavender Starflower	B	
Hakea suaveolens	Sweet Hakea	B	
Hebe species & cultivars	Hebe	A	10
Hesperaloe parviflora	Red Yucca	A	
Hibiscus rosa - sinensis	Chinese Hibiscus	A	10
Ilex species	Holly	B	
Juniperus species	Juniper	B	
Justicia brandegeana	Shrimp Plant	A	10
J. californica	Chuparosa	B	
Keckiella cordifolia	Heart-Leaved Penstemon	B	
Kniphofia uvaria	Red-Hot Poker	A	
Lantana Camara & hybrids	Lantana	A	10
Larrea tridentata	Creosote Bush	B	
Lavandula species	Lavender	A	10
Lavatera assurgentiflora/maritima	California Tree Mallow	B	
Leonotis leonrus	Lion's Tail	B	
Leptospermum scoparium & varities	New Zealand Tea Tree	B	
Leucophyllum species		B	
Ligustrum japonicum	Wax-leaf Privet	A	10
Lupinus species	Lupine	B	
Mahonia aquifolium ('Compacta')	Oregon Grape	A	10
M. fremontii	Desert Mahonia	B	
M. 'Golden Abundance'	NCN	B	
M. lomariifolia	Venetian Blind Mahonia	A	
Malosma - See Rhus			
Malva species	Mallow	A	10
Melaleuca nesophila	Pink Melaleuca	A	10
Mimulus species (Diplacus)	Monkey Flower	A	10
Myrica californica	Pacific Wax Myrtle	B	

Myrsine africana	African Boxwood	A	10
Myrtus communis 'Compacta'	Dwarf Myrtle	A	10
Nandina domestica (including dwarf varieties)	Heavenly Bamboo	A	
Nerium oleander	Oleander	B	
N.o. 'Petite Salmon'	NCN	A	10
Opuntia species	Prickly Pear, Cholla etc.	A	
Phlomis fruticosa	Jerusalem Sage	A	
Phoenix roebelenii	Pygmy Date Palm	A	
Phormium tenax and Cultivars	New Zealand Flax	A	
Photinia fraseri	Photinia	B	
Pittosporum tobira ('Variegata')	Tobira	B	
P.t.'Wheeler's Dwarf'	Dwarf Pittosporum	A	
Punica granatum 'Nana'	Dwarf Pomegranate	A	10
Prunus ilicifolia	Hollyleaf Cherry	B	
Pyracantha species	Firethorn	B	
Rhamnus california/crocea	Coffeeberry	B	
Rhaphiolepis indica and Cultivars	India Hawthorn	A	10
Rhus integrifolia/laurina	Lemonade Berry	B	40
R. ovata	Sugar Bush	B	30
Ribes species	Currant/Gooseberry	A	10
Romneya coulteri	Matilija Poppy	B	
Rosa species (except R. californica)	Rose	A	
Rosmarinus officinalis & cultivars	Rosemary	B	
Salvia species - native varieties	Sage	B	
S. greggii/leucantha	Autumn Sage	A	10
Santolina chamaecyparissus/rosmarinifolius	Lavender Cotton	A	10
Simmondsia chinensis	Jojoba	B	
Strelitzia nicolai/regina	Bird of Paradise	A	
Tagetes lemmonii	Copper Canyon Daisy	B	
Tibouchina urvilleana	Princess Flower	A	10
Trichostema lanatum	Wooly Blue Curls	B	
Viburnum species	Viburnum	A	10
Westringia fruticosa	Coast Rosemary	A	10
Xylosma congestum	Shiny Xylosma	B	
X.c. 'Compacta'	Compact Xylosma	A	10
Yucca species	Yucca	B	
Trees			
Acacia farnesiana	Sweet Acacia	A	15
A. greggii	Catclaw Acacia	B	
A. salicina	Willow Acacia	A	15
A. smallii	NCN	A	15
A. stenophylla	Shoestring Acacia	A	15
Acer negundo	Box Elder	B	
A. palmatum	Japanese Maple	A	
A. saccharinum	Silver Maple	B	30

Aesculus californica	California Buckeye	B	
Agonis flexuosa	Peppermint Tree	B	
Albizia julibrissin	Silk Tree	B	
Alnus rhombifolia	Alder	B	
Arbutus unedo ('Marina')	Strawberry Tree	A	15
Archontophoenix cunninghamiana	King Palm	A	
Bauhinia variegata	Purple Orchid Tree	B	
Betula pendula	European White Birch	A	10
Brachychiton acerifolius/populneus	Flame Tree/Bottle Tree	B	
Brahea armata/edulis	Blue Hesper Palm	A	10
Butia capitata	Pindo Palm	A	10
Callistemon citrinus	Lemon Bottlebrush	B	
C. viminalis	Weeping Bottlebrush	A	15
Calocedrus decurrens	Incense Cedar	B	
Calodendrum capense	Cape Chestnut	B	
Cedrus deodara	Deodar Cedar	B	30
Ceratonia siliqua	Carob	B	30
Cercidium floridum/microphyllum	Blue Palo Verde	A	
Cercis occidentalis/canadensis	Western Redbud	A	10
Chamaerops humilis	Mediterranean Fan Palm	A	10
Chilopsis linearis	Desert Willow	A	15
Chionanthus retusus	Chinese Fringe Tree	A	10
Chitalpa X tashkentensis	Chitalpa	A	10
Chorisia speciosa	Floss Silk Tree	B	
Cinnamomum camphora	Camphor Tree	B	30
Citrus species	Citrus	A	10
Cocculus laurifolius	Laurel Leaf Snail Seed	B	
Cordyline australis	Giant Dracaena	A	
Cyathea cooperi	Australian Tree Fern	A	
Dicksonia antarctica	Tazmanian Tree Fern	A	
Dracaena draco	Dragon Tree	A	
Eriobotrya deflexa/japonica	Bronze Loquat/Loquat	A	10
Erythrina species	Coral Tree	B	
Feijoa sellowiana	Pineapple Guava	A	10
Ficus species	Fig	B	50
Fraxinus species	Ash	B	30
Geijera parviflora	Australian Willow	A	15
Ginkgo biloba	Maidenhair Tree	A	15
Gleditsia triacanthos	Honey Locust	A	15
Grevillea robusta	Silk Oak	B	
Heteromeles arbutifolia	Toyon	A	15
Hymenosporum flavum	Sweetshade Tree	A	15
Jacaranda mimosifolia	Jacaranda	B	
Juglans californica	Black Walnut	B	
Koelreuteria bipinnata/paniculata	Chinese Flame Tree	B	
Lagerstroemia indica	Crape Myrtle	A	10
Laurus nobilis	Sweet Bay	B	

Leptospermum laevigatum	Australian Tea Tree	A	15
Liquidambar formosana	Chinese Sweet Gum	A	15
L. styraciflua	American Sweet Gum	B	
Liriodendron tulipfera	Tulip Tree	B	
Lithocarpus densiflorus	Tanbark Oak	B	
Lophpstemon confertus (Tristania)	Brisbane Box	A	15
Lyonothamnus floribundus	Catalina Ironwood	A	15
Magnolia grandiflora	Southern Magnolia	B	
M. X soulangeana	Saucer Magnolia	A	10
Maytenus boaria	Mayten Tree	A	10
Melaleuca quinquenervia	Cajeput Tree	A	15
Metasequoia glypstroboides	Dawn Redwood	A	15
Metrosideros excelsus	New Zealand Christmas Tree	A	10
Morus alba	White Mulberry	B	
Olea europea	Olive - Fruitless only	A	15
Parkinsonia aculeata	Jerusalem Thorn	A	10
Phoenix dactylifera	Date Palm	B	
Pinus species	Pine	B	75
Pistacia chinensis	Chinese Pistache	B	
Pittosporum phillyraeoides	Willow Pittosporum	A	10
P. rhombifolium	Queensland Pittosporum	B	
Platanus racemosa	California Sycamore	B	
Podocarpus gracilior/macrophyllus	Fern Pine/Yew Pine	B	
Populus fremontii	Fremont Cottonwood	B	
Prosopis chilensis	Chilean Mesquite	B	
P. glandulosa	Honey Mesquite	A	15
Prunus cerasifera 'Atropurpurea'	Purple-leaf Plum	A	10
Punica granatum	Pomegranate	B	
Pyrus calleryana/kawakamii	Ornamental Pear	A	15
Quercus species	Oak	B	30
Rhus lancea	African Sumac	B	
Robinia ambigua	Locust	B	
Sapium sebiferum	Chinese Tallow Tree	B	
Schefflera actinophylla	Queensland Unbrella Tree	A	
Sophora japonica	Japanese Pagoda Tree	B	
Stenocarpus sinuatus	Firewheel Tree	A	10
Syagrus romanzoffianum	Queen Palm	A	
Tabebuia species	Trumpet Tree	A	15
Tipuana tipu	Tipu Tree	B	
Tupidanthus calyptratus	Tupidanthus	A	
Trachycarpus fortunei	Windmill Palm	A	
Umbellularia californica	California Bay	B	
Washingtonia filifera	California Fan Palm	B	30
Zelkova serrata	Sawleaf Zelkova	B	

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SUPERINTENDENT OF BUILDING

JOHN WEIGHT
EXECUTIVE OFFICER

SOILS REPORT APPROVAL LETTER

August 11, 2025

LOG # 136328
SOILS/GEOLOGY FILE - 2
LIQ

Southern Pacific Realty Partners, LLC.
29501 Canwood St., Suite 200
Agoura Hills, CA 91301

TRACT: 1368 // 1000
LOT(S): 1 (arb2) // 214 (arb 1, 3)
LOCATION: 12501 - 12665 W. Ventura Blvd.

CURRENT REFERENCE REPORT/LETTER(S)	REPORT No.	DATE OF DOCUMENT	PREPARED BY
Soils Report	3093.I	07/08/2025	Geotechnical Professionals

The Grading Division of the Department of Building and Safety has reviewed the referenced report that provides recommendations for the proposed 5-7 levels of residential / retail building over 4 subterranean parking levels.

The earth materials at the subsurface exploration locations consist of up to 7 feet of uncertified fill underlain by clay, silt, and silty sand.

The consultants recommend to support the proposed structure on mat-type foundations bearing on competent native soils.

The site is located in a designated liquefaction hazard zone as shown on the Seismic Hazard Zones map issued by the State of California. To mitigate the earthquake induced settlements it is proposed to use a mat foundation. The requirements of the 2023 City of Los Angeles Building Code have been satisfied.

The referenced report is acceptable, provided the following conditions are complied with during site development:

(Note: Numbers in parenthesis ( ) refer to applicable sections of the 2023 City of LA Building Code. P/BC numbers refer to the applicable Information Bulletin. Information Bulletins can be accessed on the internet at LADBS.ORG.)

1. The soils engineer shall review and approve the detailed plans prior to issuance of any permit. This approval shall be by signature on the plans that clearly indicates the soils

engineer has reviewed the plans prepared by the design engineer; and, that the plans included the recommendations contained in their reports (7006.1).

2. All recommendations of the report that are in addition to or more restrictive than the conditions contained herein shall be incorporated into the plans.

3. A copy of the subject and appropriate referenced reports and this approval letter shall be attached to the District Office and field set of plans (7006.1). Submit one copy of the above reports to the Building Department Plan Checker prior to issuance of the permit.

4. A grading permit shall be obtained for all structural fill and retaining wall backfill (106.1.2).

5. All man-made fill shall be compacted to a minimum 90 percent of the maximum dry density of the fill material per the latest version of ASTM D 1557. Where cohesionless soil having less than 15 percent finer than 0.005 millimeters is used for fill, it shall be compacted to a minimum of 95 percent relative compaction based on maximum dry density. Placement of gravel in lieu of compacted fill is only allowed if complying with LAMC Section 91.7011.3.

6. If import soils are used, no footings shall be poured until the soils engineer has submitted a compaction report containing in-place shear test data and settlement data to the Grading Division of the Department; and, obtained approval (7008.2).

7. Compacted fill shall extend beyond the footings a minimum distance equal to the depth of the fill below the bottom of footings (7011.3).

8. Existing uncertified fill shall not be used for support of footings, concrete slabs or new fill (1809.2, 7011.3).

9. Drainage in conformance with the provisions of the Code shall be maintained during and subsequent to construction (7013.12).

10. The applicant is advised that the approval of this report does not waive the requirements for excavations contained in the General Safety Orders of the California Department of Industrial Relations (3301.1).

11. Temporary excavations that remove lateral support to the public way, adjacent property, or adjacent structures shall be supported by shoring. Note: Lateral support shall be considered to be removed when the excavation extends below a plane projected downward at an angle of 45 degrees from the bottom of a footing of an existing structure, from the edge of the public way or an adjacent property. (3307.3.1)

12. Prior to the issuance of any permit that authorizes an excavation where the excavation is to be of a greater depth than are the walls or foundation of any adjoining building or structure and located closer to the property line than the depth of the excavation, the owner of the subject site shall provide the Department with evidence that the adjacent property owner has been given a 30-day written notice of such intent to make an excavation (3307.1).

13. The soils engineer shall review and approve the shoring and/or underpinning plans prior to issuance of the permit (3307.3.2).

14. Prior to the issuance of the permits, the soils engineer and the structural designer shall evaluate all applicable surcharge loads for the design of the retaining walls and shoring.

15. Unsurcharged temporary excavation may be cut vertical up to 5 feet. Excavations over 5 feet to a maximum height of 15 feet shall be trimmed back at a uniform gradient not exceeding 1.5(H):1(V), from top to bottom of excavation, as recommended.

16. Shoring shall be designed for the lateral earth pressures specified in the section titled "Temporary Shoring" starting on page 17 of the referenced report; all surcharge loads shall be included into the design.

17. Shoring shall be designed for a maximum lateral deflection of 1 inch, provided there are no structures within a 1:1 plane projected up from the base of the excavation. Where a structure is within a 1:1 plane projected up from the base of the excavation, shoring shall be designed for a maximum lateral deflection of ½ inch, or to a lower deflection determined by the consultant that does not present any potential hazard to the adjacent structure.

18. A shoring monitoring program shall be implemented to the satisfaction of the soils engineer.

19. The proposed structure shall be supported on a mat foundation deriving entire support from competent native soils, as recommended and shall be approved by the geologist and soils engineer by inspection.

20. The proposed structure and subterranean walls shall be designed to resist uplift and hydrostatic pressures that would develop due to the historic high groundwater level conditions.

21. The seismic design shall be based on a Site Class D, as recommended. All other seismic design parameters shall be reviewed by LADBS building plan check.

22. Retaining walls shall be designed for the lateral earth pressures specified in the section titled "Basement and Retaining Walls" starting on page 16 of the referenced report. All surcharge loads shall be included into the design.

23. All retaining walls shall be provided with a standard surface backdrain system and all drainage shall be conducted in a non-erosive device to the street in an acceptable manner (7013.11).

24. With the exception of retaining walls designed for hydrostatic pressure, all retaining walls shall be provided with a subdrain system to prevent possible hydrostatic pressure behind the wall. Prior to issuance of any permit, the retaining wall subdrain system recommended in the soils report shall be incorporated into the foundation plan which shall be reviewed and approved by the soils engineer of record (1805.4).

25. Installation of the subdrain system shall be inspected and approved by the soils engineer of record and the City grading/building inspector (108.9).

26. Basement walls and floors shall be waterproofed/damp-proofed with an LA City approved "Below-grade" waterproofing/damp-proofing material with a research report number (104.2.6).

27. The use of acceptable prefabricated drainage composites (also known as geosynthetic subdrain systems), as an alternative to traditionally accepted methods of draining retained earth, shall be determined during structural plan check.

28. The structure shall be connected to the public sewer system per P/BC 2020-027.

29. All roof, pad and deck drainage shall be conducted to the street in an acceptable manner in non-erosive devices or other approved location in a manner that is acceptable to the LADBS and the Department of Public Works (7013.10).

30. An on-site storm water infiltration system at the subject site shall not be implemented, as recommended.

31. All concentrated drainage shall be conducted in an approved device and disposed of in a manner approved by the LADBS (7013.10).

32. Prior to issuance of grading or building permits, a supplemental report prepared by a professional licensed by the State of California to perform groundwater studies, shall be submitted for review and approval containing, but not be limited to, justification that the proposed system is feasible and practical, specifics on the proposed dewatering system, and anticipated flow rates to lower groundwater levels to design elevations, and potential adverse impacts on adjacent properties such as excessive vertical and horizontal deformations (1805.1.3)

33. Prior to issuance of a permit involving de-watering, clearance shall be obtained from the Department of Public Works and from the California Regional Water Quality Control Board.

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    320 W. 4th Street, Suite 200 (213) 576-6600 (LARWQB)

34. The area shall be de-watered under the direction of the consultants prior to beginning the excavation. Note: Permits from the State of California Regional Water Quality Control Board and Department of Public Works shall be obtained to discharge water into a storm drain.

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    320 W. 4th Street, Suite 200 (213) 576-6600 (LARWQB)

35. The Upper Los Angeles River Area (ULARA) Watermaster office shall be notified whenever dewatering is proposed in the City of Los Angeles portion of the San Fernando Basin. More information can be obtained at the web site: http://ularawatermaster.com/.

36. The soils engineer shall inspect all excavations to determine that conditions anticipated in the report have been encountered and to provide recommendations for the correction of hazards found during grading (7008, 1705.6 & 1705.8).

37. Prior to pouring concrete, a representative of the consulting soils engineer shall inspect and approve the footing excavations. The representative shall post a notice on the job site for the LADBS Inspector and the Contractor stating that the work inspected meets the conditions of the report. No concrete shall be poured until the LADBS Inspector has also inspected and approved the footing excavations. A written certification to this effect shall

be filed with the Grading Division of the Department upon completion of the work. (108.9 & 7008.2)

38. Prior to excavation an initial inspection shall be called with the LADBS Inspector. During the initial inspection, the sequence of construction; [shoring; ABC slot cuts; underpinning; pile installation;] protection fences; and, dust and traffic control will be scheduled (108.9.1).

39. Installation of shoring, underpinning, slot cutting and/or pile excavations shall be performed under the inspection and approval of the soils engineer and deputy grading inspector (1705.6, 1705.8).

40. Prior to the placing of compacted fill, a representative of the soils engineer shall inspect and approve the bottom excavations. The representative shall post a notice on the job site for the LADBS Inspector and the Contractor stating that the soil inspected meets the conditions of the report. No fill shall be placed until the LADBS Inspector has also inspected and approved the bottom excavations. A written certification to this effect shall be included in the final compaction report filed with the Grading Division of the Department. All fill shall be placed under the inspection and approval of the soils engineer. A compaction report together with the approved soil report and Department approval letter shall be submitted to the Grading Division of the Department upon completion of the compaction. In addition, an Engineer's Certificate of Compliance with the legal description as indicated in the grading permit and the permit number shall be included (7011.3).

YING LIU
Geotechnical Engineer II

Log No. 136328
213-482-0480

cc: Applicant
Project Consultant
VN District Office

CITY OF LOS ANGELES
INTERDEPARTMENTAL CORRESPONDENCE

Date: January 29, 2026

To: Mr. Vincent P. Bertoni, Director
Department of City Planning
Attention: Deputy Advisory Agency

From: Hui Huang, Principal Civil Engineer
Permit Case Management
Bureau of Engineering (BOE)

Subject: **Vesting Tentative Tract Map No. 84453 – Revised Report**

Transmitted is a print of vesting tentative map of Tract Map No. 84453 stamp dated October 14, 2025, and located at 12501–12665 West Ventura Boulevard in Council District No. 4.

This map has been filed for the merger of existing lots to create two (2) ground master lots and sixteen (16) airspace lots for residential and commercial purposes.

The applicant requested a phased map. We recommend that the City Planning Department add the following conditions in the Letter of Determination:

The tract will be permitted to record with final map units in a number and sequence satisfactory to the Advisory Agency. The subdivider shall submit the unit map fee, a unit map showing the boundaries of all units and the unit number(s) of each unit map(s). Dedications and improvements for each unit map shall be phased in-line with the unit map(s) boundaries satisfactory to the City Engineer.

The map layout is generally satisfactory as submitted.

There are existing sewers available in the street adjoining the subdivision. The construction of house connection sewers may be required to serve the tract. This tract will connect to the public sewer system and will not result in violation of the California Water Code. I therefore recommend that you make the necessary determination.

In the event you approve this vesting tentative tract map of Tract No. 84453, please include the engineering standard conditions issued

by your department and the following special conditions:

1. That along Valleyheart Drive and adjoining the subdivision, a 5-foot wide strip of land be dedicated to complete a 10-foot wide Limited Local Street standard border.

2. That a 20-foot radius property line return be dedicated at the intersection of Valleyheart Drive and Whitsett Avenue.

3. That the subdivider makes a request to the BOE - Valley District Office to determine the capacity of existing sewers in this area.

4. That any required drainage easements be shown on the final map satisfactory to the Valley District Office and Los Angeles County Department of Public Works.

5. That arrangements be made with the Los Angeles County Department of Public Works prior to recordation of the final map for any necessary permits with respect to discharge into the Los Angeles County Flood Control Channel.

6. That a set of drawings for airspace lots be submitted to the City Engineer showing the following:

   a. Plan view at different elevations.
   b. Isometric views.
   c. Elevation views.
   d. Section cuts at all locations where air space lot boundaries change.

7. That the owners of the property record an agreement satisfactory to the City Engineer stating that they will grant the necessary private easements for ingress and egress purposes to serve proposed airspace lots to use upon the sale of the respective lots and they will maintain the private easements free and clear of obstructions and in safe conditions for use at all times.

8. That the following improvements be either constructed prior to recordation of the final map or that the construction be suitably guaranteed:

   a) Improve Ventura Boulevard adjoining the subdivision with the construction of new concrete curb, gutter and a full-width concrete sidewalk with tree wells. Repair any broken, damaged or off-grade roadway pavement, including any necessary removal and reconstruction of existing

improvements.

b) Improve Whitsett Avenue adjoining the subdivision by the construction of a new full-width concrete sidewalk with tree wells. Repair and/or replace any broken, damaged or off-grade concrete curb, gutter and roadway pavement, including any necessary removal and reconstruction of existing improvements.

c) Improve Valleyheart Drive being dedicated and adjoining the subdivision with the construction of a new 10-foot wide concrete sidewalk with tree wells. Repair and/or replace any broken, damaged or off-grade concrete curb, gutter and roadway pavement, including any necessary removal and reconstruction of existing improvements.

d) Construct the necessary on-site mainline and house connection sewers satisfactory to the City Engineer.

Any questions regarding this report may be directed to the Bureau of Engineering Permit Case Management Division - Land Development Group, via the Customer Service Request system at https://dscsr.lacity.org/.

CITY OF LOS ANGELES
INTER-DEPARTMENTAL CORRESPONDENCE

DATE: February 23, 2026

TO: Blake Lamb, Deputy Advisory Agency
6262 Van Nuys Boulevard
Department of City Planning

FROM: Helen Nguyen, Subdivision Review
Minye Pak, Zoning Engineer
201 N. Figueroa Street, Room 1030
Department of Building and Safety

SUBJECT: **TRACT MAP NO. VTT-84453 - Vesting**
12501 W Ventura Blvd

The Department of Building and Safety Zoning Section has reviewed the above Subdivision Map, date stamped on October 14, 2025 by the Department of City Planning. The site is designated as being in the **C1.5-1VL-RIO** Zone. A clearance letter will be issued stating that no Building or Zoning Code violations exist relating to the subdivision on the subject site once the following items have been satisfied.

a. Obtain permits for the demolition or removal of all existing structures on the site. Accessory structures and uses are not permitted to remain on lots without a main structure or use. Provide copies of the demolition permits and signed inspection cards to show completion of the demolition work.

b. The proposed Map does not comply with the density requirements for the C1.5 Zone per LAMC Section 12.13.5.B.3. Obtain approval from the Advisory Agency for the deviation from the zoning code.

c. Provide a copy of CPC case CPC-2025-5697-DB-PR-SPPC-MCUP-VHCA. Show compliance with all the conditions/requirements of the CPC case as applicable.

d. Provide a copy of ZA case ZA-1987-661-PAB. Show compliance with all the conditions/requirements of the ZA case as applicable.

e. Provide a copy of DIR case DIR-2003-6079-SPP. Show compliance with all the conditions/requirements of the DIR case as applicable.

f. Provide a copy of affidavits OB-11978, AF-91-2009990-OP, OB-11493, AF-91-693236-OB, AF-91-2033791-OB, AF-91-2009990-OP, AF-91-693235-LT and AFF-50014. Show compliance with all the conditions/requirements of the above affidavits as applicable. Termination of above affidavits may

be required after the Map has been recorded. Obtain approval from the Department, on the termination form, prior to recording.

g. Show all street dedication as required by Bureau of Engineering and provide net lot area after all street dedications. "Area" and density requirements shall be re-checked as per net lot area after street dedications. Front and side yard requirements shall be required to comply with current code as measured from new property lines after dedications.

h. Submit a revised Map that dimensions each air space lot with a finite width, length, and upper and lower elevations. The final Map shall be based upon a site plan which accurately describes the location of such lots.

i. Record a Covenant and Agreement to treat the buildings and structures located in an Air Space Subdivision as if they were within a single lot.

j. Provide a copy of the draft final map to LADBS Zoning to obtain the final Zoning clearance.

Notes:

This property is located within the ZI-2358 River Implementation Overlay District (RIO).

This property is located within the ZI-1729 Specific Plan: Ventura/Cahuenga Boulevard Corridor.

This property is located in a Very High Fire Hazard Severity Zone.

This property is located in a Liquefaction Zone.

Any proposed structures or uses on the site have not been checked for and shall comply with Building and Zoning Code requirements. Plan check will be required before any construction, occupancy or change of use.

The proposed buildings may not comply with City of Los Angeles Building Code requirements concerning exterior wall, protection of openings and exit requirements with respect to the proposed and existing property lines. Compliance shall be to the satisfactory of LADBS at the time of plan check. If the proposed development does not comply with the current Zoning Code, all zoning violations shall be indicated on the Map.

An appointment is required for the issuance of a clearance letter from the Department of Building and Safety. The applicant is asked to contact Helen Nguyen at (213) 482-0427 or helen.nguyen@lacity.org to schedule an appointment.

cc: planning.valleyprojects@lacity.org

+FORM. GEN. 160 (Rev. 6-80)

CITY OF LOS ANGELES

INTER-DEPARTMENTAL CORRESPONDENCE

February 18, 2026

TO: Vincent Bertoni, AICP, Director of Planning
Department of City Planning
Attention: planning.valleyprojects@lacity.org

FROM: Los Angeles Fire Department

SUBJECT: **VTT-84453-HCA-REVISED (12501 W. Ventura Blvd.)**

Submit plot plans for Fire Department approval and review prior to recordation of Tract Map action.

RECOMMENDATIONS:

Access for Fire Department apparatus and personnel to and into all structures shall be required.

Address identification. New and existing buildings shall have approved building identification placed in a position that is plainly legible and visible from the street or road fronting the property.

One or more Knox Boxes will be required to be installed for LAFD access to project. Location and number to be determined by LAFD Field Inspector. (Refer to FPB Req # 75).

The entrance or exit of all ground dwelling units shall not be more than 150 feet from the edge of a roadway of an improved street, access road, or designated fire lane.

No building or portion of a building shall be constructed more than 150 feet from the edge of a roadway of an improved street, access road, or designated fire lane.

Fire Lane Requirements:

1) Fire lane width shall not be less than 20 feet. When a fire lane must accommodate the operation of Fire Department aerial ladder apparatus or where fire hydrants are installed, those portions shall not be less than 28 feet in width.
2) The width of private roadways for general access use and fire lanes shall not be less than 20 feet, and the fire lane must be clear to the sky.
3) Fire lanes, where required and dead ending streets shall terminate in a cul-de-sac or other approved turning area. No dead ending street or fire lane shall be greater than 700 feet in length or secondary access shall be required.
4) Submit plot plans indicating access road and turning area for Fire Department approval.
5) All parking restrictions for fire lanes shall be posted and/or painted prior to any Temporary Certificate of Occupancy being issued.
6) Plans showing areas to be posted and/or painted, “FIRE LANE NO PARKING” shall be submitted and approved by the Fire Department prior to building permit application sign-off.

7) Electric Gates approved by the Fire Department shall be tested by the Fire Department prior to Building and Safety granting a Certificate of Occupancy.
8) All public street and fire lane cul-de-sacs shall have the curbs painted red and/or be posted "No Parking at Any Time" prior to the issuance of a Certificate of Occupancy or Temporary Certificate of Occupancy for any structures adjacent to the cul-de-sac.
9) No framing shall be allowed until the roadway is installed to the satisfaction of the Fire Department.

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.

Construction of public or private roadway in the proposed development shall not exceed 10 percent in grade.

On small lot subdivisions, any lots used for access purposes shall be recorded on the final map as a "Fire Lane".

Private development shall conform to the standard street dimensions shown on Department of Public Works Standard Plan S-470-0.

Standard cut-corners will be used on all turns.

The Fire Department may require additional vehicular access where buildings exceed 30 feet in height.

Where the vertical distance between the grade plane and the highest roof surface exceeds 30 feet, approved aerial fire apparatus access roads shall be provided.

Where above ground floors are used for residential purposes, the access requirement shall be interpreted as being the horizontal travel distance from the street, driveway, alley, or designated fire lane to the main entrance of individual units.

The following recommendations of the Fire Department relative to fire safety shall be incorporated into the building plans, which includes the submittal of a plot plan for approval by the Fire Department either prior to the recordation of a final map or the approval of a building permit. The plot plan shall include the following minimum design features: fire lanes, where required, shall be a minimum of 20 feet in width; all structures must be within 300 feet of an approved fire hydrant, and entrances to any dwelling unit or guest room shall not be more than 150 feet in distance in horizontal travel from the edge of the roadway of an improved street or approved fire lane.

FPB #105
5101.1 Emergency responder radio coverage in new buildings. All new buildings shall have approved radio coverage for emergency responders within the building based upon the existing coverage levels of the public safety communication systems of the jurisdiction at the exterior of the building. This section shall not require improvement of the existing public safety communication systems.

2014 CITY OF LOS ANGELES FIRE CODE, SECTION 503.1.4 (EXCEPTION)

a. When this exception is applied to a fully fire sprinklered residential building equipped with a wet standpipe outlet inside an exit stairway with at least a 2 hour rating the distance from the wet standpipe outlet in the stairway to the entry door of any dwelling unit or guest room shall not exceed 150 feet of horizontal travel AND the distance from the edge of the roadway of an improved street or approved fire lane to the door into the same exit stairway directly from outside the building shall not exceed 150 feet of horizontal travel.

b. It is the intent of this policy that in no case will the maximum travel distance exceed 150 feet inside the structure and 150 feet outside the structure. The term "horizontal travel" refers to the actual path of travel to be taken by a person responding to an emergency in the building.

c. This policy does not apply to single-family dwellings or to non-residential buildings.

Site plans shall include all overhead utility lines adjacent to the site.

Where access for a given development requires accommodation of Fire Department apparatus, overhead clearance shall not be less than 14 feet.

No proposed development utilizing cluster, group, or condominium design of one or two family dwellings shall be more than 150 feet from the edge of the roadway of an improved street, access road, or designated fire lane.

Any roof elevation changes in excess of 3 feet may require the installation of ships ladders.

Building designs for multi-storied residential buildings shall incorporate at least one access stairwell off the main lobby of the building; But, in no case greater than 150ft horizontal travel distance from the edge of the public street, Private Street or Fire Lane. This stairwell shall extend onto the roof.

Entrance to the main lobby shall be located off the address side of the building.

Any required Fire Annunciator panel or Fire Control Room shall be located within 20ft visual line of site of the main entrance stairwell or to the satisfaction of the Fire Department.

Where rescue window access is required, provide conditions and improvements necessary to meet accessibility standards as determined by the Los Angeles Fire Department.

Adequate off-site public and on-site private fire hydrants may be required. Their number and location to be determined after the Fire Department's review of the plot plan.

Any required fire hydrants to be installed shall be fully operational and accepted by the Fire Department prior to any building construction.
The applicant is further advised that all subsequent contact regarding these conditions must be with the Hydrant and Access Unit. This would include clarification, verification of condition compliance and plans or building permit applications, etc., and shall be accomplished **BY APPOINTMENT ONLY**, in order to assure that you receive service with a minimum amount of waiting please call **(213) 482-6543**. You should advise any consultant representing you of this requirement as well.

Jaime E. Moore
Fire Chief

David A. Perez, Fire Marshal
Bureau of Fire Prevention and Public Safety

DP:KC:kc

VTT-84453-HCA-REVISED (12501 W. Ventura Blvd.)

Adrineh Melkonian <adrineh.melkonian@lacity.org>

VTT-84453, 12501-12665 W. Ventura Boulevard LADBS-Grading Report

1 message

CASEY JENSEN <casey.jensen@lacity.org> Tue, Mar 10, 2026 at 10:03 AM
To: Planning Valley Projects <planning.valleyprojects@lacity.org>, Adrineh Melkonian <adrineh.melkonian@lacity.org>

03/10/2026

Planning,
The Grading Division of the Department of Building and Safety has reviewed Vesting Tentative Tract Map No. VTT-84453 located at 12501-12665 W. Ventura Boulevard. The attached Soils Report Approval Letter dated 08/11/2025 (Log # 136328) still applies.

Thank you,

Casey Lee Jensen, PG, CEG
Engineering Geologist Associate III
Inspection Bureau, Grading Division
Los Angeles Department of Building and Safety
Suite 1200, 221 N. Figueroa St., Los Angeles, CA 90012
Casey.Jensen@lacity.org | 213.482.0490 | dbs.lacity.gov

136328.pdf
253K

CITY OF LOS ANGELES

INTER-DEPARTMENTAL MEMORANDUM

12501 W Ventura Blvd
LADOT Project ID No. 60323

Date: October 21, 2025

To: Deputy Advisory Agency
Department of City Planning

From: Miguel Crisostomo, Transportation Engineering Associate II
Department of Transportation

Subject: **Parcel Map No. VTT-84453-HCA**

Reference is made to your request for review of this case regarding potential traffic access problems. Based upon this review, it is recommended that:

1. A minimum 20-foot reservoir space is required between any security gate or parking space and the property line, or to the satisfaction of LADOT.

2. A two-way driveway width of W=30 feet is required for all driveways, or to the satisfaction of LADOT.

3. A parking area and driveway plan should be submitted to the Citywide Planning Coordination Section of the Los Angeles Department of Transportation for approval prior to submittal of building permit plans for plan check by the Department of Building and Safety. Transportation approvals are conducted at 6262 Van Nuys Blvd., Room 320, Van Nuys, CA 91401.

4. The report fee and condition clearance fee be paid to the Los Angeles Department of Transportation as required per Ordinance No. 183270 and LAMC Section 19.15 prior to recordation of the final map. Note: The applicant may be required to comply with any other applicable fees per this new ordinance.

If you have any questions, you may contact me at Miguel.crisostomo@lacity.org or 818-374-4699.

FORM GEN. 160 (REV. 6-80)

CITY OF LOS ANGELES
INTER-DEPARTMENTAL CORRESPONDENCE

DATE: March 4th, 2026

TO: Shana M.M. Bonstin
Arthi L. Varma
Lisa M. Webber
Haydee Urita-Lopez
Kevin Keller
Deputy Director of Planning
Department of City Planning

FROM: Kwasi Berko, Division Manager
Clean Water North Conveyance Division
LA Sanitation & Environment

SUBJECT:

VTT-84941-SL-SH-HCA	4276 North Van Nuys Boulevard
VTT-84453-HCA	12501 West Ventura Boulevard
TT-85007-CC	116 & 118 North Orlando Avenue
ADM-2026-526-PMUL	13831 & 13833 West Bessemer Street
ADM-2026-152-PMUL-HCA	10752 Independence Avenue
AA-2026-518-PM	15104 West Nurmi Street
ADM-2025-5372-PMUL	2302 West Las Colinas Avenue & 4719 North Ellenwood Drive
AA-2026-765-PM	7508 North Nestle Avenue
VTT-85045-CC	3050 West 11th Street 1100 - 1110 South Hobart Boulevard
APCNV-2026-815-ZC-CU2-CUB-PR	12800 Roscoe Boulevard
TT-85151-SH-VHCA	6540 North Shoup Avenue
ADM-2026-805-PMUL	8258 - 8264 West Mcgroarty Street

Our office has reviewed the sewer/storm drain lines serving the subject tracts/areas, and found no potential problems to our structures and/or potential maintenance issues.

Note: This Approval is for the Tract Map only and represents the office of LA Sanitation/CWCDs. The applicant may be required to obtain other necessary Clearances/Permits from LA Sanitation and appropriate District office of the Bureau of Engineering.

If you have any questions, please contact Dean Taylor at (323) 342-1550.

KB/dt

FORM GEN. 160 (Rev. 6-80)

CITY OF LOS ANGELES
INTER-DEPARTMENTAL CORRESPONDENCE

Date: 10/28/2025

To: Mr. Vincent P. Bertoni, Director
Department of City Planning
200 N. Spring St, 5th Flr, MS-395

Richard Tom for

From: Jay Wong, Manager
Private Development Division
Bureau of Street Lighting

SUBJECT: STREET LIGHTING REQUIREMENTS FOR DISCRETIONARY ACTIONS
CITY PLANNING CASE No.: TRACT 84453
12501 W VENTURA BLVD

The Bureau of Street Lighting's recommended condition of approval for the subject city planning case is as follows: (Improvement condition added to S-3 (c) where applicable.)

SPECIFIC CONDITION: Prior to the recordation of the final map or issuance of the Certificate of Occupancy (C of O), street lighting improvement plans shall be submitted for review and the owner shall provide a good faith effort via a ballot process for the formation or annexation of the property within the boundary of the development into a Street Lighting Maintenance Assessment District.
IMPROVEMENT CONDITION: Construct new street lights: ten (10) on Valleyheart Dr. If street widening per BOE improvement conditions, relocate and upgrade street lights: one (1) on Whitsett Ave. and twelve (12) on Ventura Blvd.

NOTES:
The quantity of street lights identified may be modified slightly during the plan check process based on illumination calculations and equipment selection.

Conditions set: 1) in compliance with a Specific Plan, 2) by LADOT, or 3) by other legal instrument excluding the Bureau of Engineering conditions, requiring an improvement that will change the geometrics of the public roadway or driveway apron may require additional or the reconstruction of street lighting improvements as part of that condition.

CC: Land Development Group MS 901
Engineering District Office: VAL

FORM GEN. 160 (Rev. 8-12)

CITY OF LOS ANGELES

INTER-DEPARTMENTAL CORRESPONDENCE

DATE: March 12, 2026

TO: Blake Lamb, Deputy Advisory Agency
Department of City Planning

FROM: for Bryan Ramirez, Street Tree Superintendent I
Bureau of Street Services, Urban Forestry Division

SUBJECT: **TT-84453 – 12501 W. VENTURA BLVD.**

In regard to your request for review of this case regarding Urban Forestry requirements, it is our recommendation that:

1. **STREET TREES**

a. Project shall preserve all healthy mature street trees whenever possible. All feasible alternatives in project design should be considered and implemented to retain healthy mature street trees. A permit is required for the removal of any street tree and shall be replaced 2:1 as approved by the Board of Public Works and Urban Forestry Division.

b. When street dedications are required and to the extent possible, the project shall provide larger planting areas for existing street trees to allow for growth and planting of larger stature street trees. This includes and is not limited to parkway installation and/or enlargement of tree wells and parkways.

c. Plant street trees at all feasible planting locations within dedicated streets as directed and required by the Bureau of Street Services, Urban Forestry Division. All tree plantings shall be installed to current tree planting standards when the City has previously been paid for tree plantings. The sub divider or contractor shall notify the Urban Forestry Division at: (213) 847-3077 upon completion of construction for tree planting direction and instructions.

Note: Removal of street trees requires approval from the Board of Public Works. All projects must have environmental (CEQA) documents that appropriately address any removal and replacement of street trees. Contact Urban Forestry Division at: (213) 847-3077 for tree removal permit information.

BR:djm

DEPARTMENT OF RECREATION AND PARKS

BOARD OF COMMISSIONERS

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BRENDA AGUIRRE
ASSISTANT GENERAL MANAGER

CHINYERE STONEHAM
ASSISTANT GENERAL MANAGER

(213) 202-2633

Letter sent via email to:
planning.valleyprojects@lacity.org

January 15, 2026

Blake Lamb
Principal City Planner
6262 Van Nuys Blvd., 4th Floor
Van Nuys, CA 91401-2709

DEPARTMENT OF RECREATION AND PARKS REPORT AND RECOMMENDATIONS RELATIVE TO VTT-84453-HCA

Dear Blake Lamb:

The City of Los Angeles Department of Recreation and Parks (RAP) has prepared the following report and recommendations in response to your request for comments relative to VTT-84453-HCA (project), a proposed residential subdivision over fifty (50) units.

RAP's report and recommendation(s) regarding the proposed project are as follows:

General Comments:
The applicant is requesting approval of the proposed project, a mixed-income 814-unit housing project. Los Angeles Municipal Code (LAMC) 12.33.C requires most residential projects that create new dwelling units or joint living and work quarters to dedicate land or pay a fee for the purpose of developing park and recreational facilities and LAMC 12.33.D specifies how those dedications are to be calculated.

Pursuant to LAMC 17.04, the Department of Recreation and Parks (RAP) is to submit a Report to the Advisory Agency for each application for subdivision map approval and that Report "shall contain recommendations, approved by the Board of Recreation and Parks Commissioners (Board), specifying the land to be dedicated, the payment of fees in lieu thereof, or a combination of both…"

On January 15, 2026, the RAP Board approved Board Report 26-013 which recommends that the Advisory Agency require the proposed project to pay the in-lieu fee under provisions of LAMC 12.33.

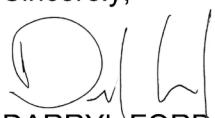
RAP Recommendation:
The applicant is requesting approval of a subdivision that will contain residential dwelling units. Therefore, pursuant to Los Angeles Municipal Code sections 12.33.D, RAP recommends the following be added as a condition of the approval of the proposed project:

That the Project pay in-lieu fees in order to fulfill the Project's requirements under provisions of LAMC 12.33.

Thank you for the opportunity to provide information relative to recreation and park issues related to this proposed project. Please provide the RAP contact listed below with any and all agendas, notices, and staff reports for the Advisory Agency actions and/or hearings related to this application.

If you have any questions or comments regarding this information please feel free to contact Park Fees Staff at, (213) 202-2682 or rap.parkfees@lacity.org, at your convenience.

Sincerely,



DARRYL FORD
Superintendent

DF:js

cc: Brett Torino & Eleda Cohen, jgenton@gentonproperty.com
Daniel Rahe, Daniel.rahe@psomas.com
Rose.fistrovic@psomas.com

cc: Reading file

Attachments

Board Report No. 26-013

APPROVED
Jan 15 2026
BOARD OF RECREATION
AND PARK COMMISSIONERS

BOARD REPORT **NO.** 26-013

DATE January 15, 2026 C.D. 4

BOARD OF RECREATION AND PARK COMMISSIONERS

SUBJECT: VESTING TENTATIVE TRACT MAP VTT-84453-HCA – RECOMMENDATION TO THE ADVISORY AGENCY FOR IN-LIEU PARK FEE PAYMENT

B. Aguirre	_____	M. Rudnick	_____
B. Jones	_____	for *C. Santo Domingo	DF
C. Stoneham	_____	N. Williams	_____

General Manager

Approved X Disapproved _____ Withdrawn _____

RECOMMENDATIONS

1. Recommend that the Advisory Agency require Vesting Tentative Tract (VTT) 84453-HCA (Project) to provide an in-lieu fee payment to the City in order to fulfill the Project's requirements under provisions of Los Angeles Municipal Code (LAMC) Section 12.33 to the satisfaction of RAP; and,

2. Authorize RAP's General Manager or designee to provide a Report to the Advisory Agency informing them of the Board of Recreation and Parks Commissioners' (Board) recommendation.

SUMMARY

Ordinance 184,505 (Parks Dedication and Fee Update Ordinance) became effective on January 11, 2017. Ordinance 184,505 requires most residential projects that create new dwelling units or joint living and work quarters to dedicate land or to pay a fee in-lieu (Park Fee) for the purpose of developing park and recreational facilities. Residential projects that propose one or more additional dwelling units are subject to these requirements unless they meet one of the exceptions listed in LAMC Section 12.33.C.3 (e.g. certain affordable housing units and secondary dwelling units may be exempt from any requirement to pay a fee).

LAMC Chapter 1ASEC. 13B.7.1.C.2.a (Advisory Agency) states in part that, "[t]he Advisory Agency is charged with the duty of making investigations and reports on the design and improvement of proposed subdivisions, of requiring the dedication of land, the payment of fees in lieu thereof, or a combination of both, for the acquisition and development of park and recreation sites and facilities…". The Director of the City Planning Department (City Planning) is designated as the Advisory Agency for the City of Los Angeles and is authorized to act in such capacity through one or more deputies appointed by him or her for that purpose.

LAMC Chapter 1A SEC. 13B.7.1.D.3.b (Subdivision Committee) states that RAP is to submit a Report to the Advisory Agency for each application for subdivision map approval and that report "shall contain recommendations, approved by the Board of Recreation and Park Commissioners, specifying the land to be dedicated, the payment of fees in lieu thereof, or a combination of both for the acquisition and development of park or recreational sites and facilities to serve the future inhabitants of such subdivision... ".

PROJECT SUMMARY

The proposed Project is a 7.8-acre 814-unit mixed-use residential development located at 12555 Ventura Boulevard in the Studio City community. The vesting subdivision tract map would divide the site into two master lots for phasing, and sixteen airspace lots for residential and commercial use. The development is composed of 223 studio units, 373 one-bedroom units, and 218 2-bedroom units across 3 seven-story apartment buildings and 3 two-story retail buildings. Four levels of subterranean parking would also be constructed. The development includes the demolition of four existing commercial buildings. The Project includes common open space courtyards, a pool and deck, two indoor pool lounges, a gym/fitness room, a yoga and coffee lounge, two recreation rooms, and private residential balconies. All amenities would only be accessible to residents.

The Project, as submitted to City Planning, is not proposing to make an on-site or off-site land dedication to the City of Los Angeles.

Renderings of the Project are attached (Attachment 1).

EARLY CONSULTATION MEETING

Pursuant to LAMC Section 12.33 D.1, applicants of residential Subdivision projects with more than fifty residential dwelling units are required to meet with RAP and City Planning prior to submitting a tract map application to City Planning. Per LAMC Section 12.33.D.1, "[t]he purpose of this early consultation is to discuss whether the City requires land dedication for the project and/or to discuss credits available to the applicant, if any."

RAP and City Planning staff held an Early Consultation meeting with Project representatives on **July 17th, 2025**. The meeting included a discussion of the requirements of Los Angeles Municipal Code Section 12.33, the maximum land dedication that the Project could be required to provide, options and opportunities for on-site or off-site park land dedications, the calculation of Park Fees, and the various recreational credits available to the Project.

ADVISORY AGENCY

The Project filed a tract map application with City Planning on **October 20, 2025**. On October 20, 2025, the Advisory Agency sent RAP a notification requesting RAP provide its report and recommendations on the Project by **November 28, 2025**. The Advisory Agency Filing Notification is attached (Attachment 2).

If no written Report is provided to the Advisory Agency, the Advisory Agency will assume that RAP has no report to make.

REQUIRED LAND DEDICATION / IN-LIEU FEE PAYMENT

Pursuant to LAMC Section 12.33 C, "All new residential dwelling units and joint living and work quarters shall be required to dedicate land, pay a fee, or provide a combination of land dedication and fee payment for the purpose of acquiring, expanding and improving park and recreational facilities for new residents."

Land Dedication

LAMC Section 12.33.D states that residential subdivision projects with more than fifty residential dwelling units can be required by the City to dedicate land to the City for park and recreation purposes. The maximum amount of land that the Advisory Agency could require a project to dedicate to the City is calculated based on the formula detailed in LAMC Section 12.33.D.2:

- **LD = (DU x P) x F**
  - **LD =** Land to be dedicated in acres.
  - **DU =** Total number of new market-rate dwelling units.
  - **P =** Average number of people per occupied dwelling unit as determined by the most recent version of the U.S. Census for the City of Los Angeles.
    - **P = 2.7**
  - **F =** Park Service factor, as indicated by the Department of Recreation and Parks rate and fee schedule.
    - **F = 0.00251 (2.51 acres of park land per 1,000 residents)**

The **maximum** land dedication for the Project would be:

5.5 Acres = (814 x 2.7) x 0.00251

The amount of land that is required to be dedicated is subject to change depending on the Park Service factor in effect at the time the Project is required to dedicate the land; the number of exempt dwelling units (e.g. affordable housing units, existing dwelling units to be replaced on site, etc.) included as part of the Project; any Dwelling Unit Construction Tax previously paid by the Project; and, any credits granted by RAP to the Project for improvements to dedicated park land or for eligible privately owned recreational facilities and amenities.

As currently proposed, the Project has 44 units that would likely qualify for an exemption per LAMC Section 12.33.C.3. If those dwelling units are ultimately determined to be exempt, the maximum required land dedication for the Project would be:

5.2 Acres = (768 x 2.7) x 0.00251

Per LAMC Section 12.33.D.3, a project that is required to make a land dedication to the City may make said land dedication, or any portion thereof, either on-site or off-site of the project location. Any off-site land dedication must be located within a certain radius from the project site, as specified below:

a) Neighborhood Park: within a 2-mile radius
b) Community Park: within a 5-mile radius
c) Regional Park: within a 10-mile radius

While the Advisory Agency has the authority to require the Project to dedicate land to the City for park purposes, the Board would need to approve any proposed park land dedication before that land can be acquired and accepted by the City. Therefore, if the Advisory Agency requires the Project to dedicate land to the City, RAP staff would need to prepare a subsequent report to the Board regarding the proposed land dedication. That report would detail the amount and location of the land being dedicated, and the improvements, if any, proposed to be developed on the dedicated property. Additionally, if it is determined that the Project will provide a combination of land dedication and fee payment, the report would also identify the amount of in-lieu fees that would be owed to the City after RAP credits the Project for the amount of land being dedicated.

In-Lieu Fee Payment

Pursuant to LAMC Section 12.33, the Park Fee amount is determined by the type of residential development project (Subdivision or Non-Subdivision) being developed. RAP shall collect these fees pursuant to LAMC Section 19.17 and the Park Fees Section of RAP's Rate and Fee Schedule. As of July 1, 2025, Residential Subdivision projects that are subject to the Subdivision fee shall pay:

$17,964.00 x **number of new non-exempt dwelling units**

The **maximum** Park Fees payment for the Project would be:

$13,886,840.00 = $17,964.00 x 814 dwelling units

As currently proposed, the Project has 44 that would likely qualify for an exemption per LAMC Section 12.33 C.3. If those dwelling units are ultimately determined to be exempt, the maximum required land dedication for the Project would be:

$13,102,080.00 = $17,964.00 x 768 dwelling units

The amount of Park Fees that are required to be paid is subject to change depending on the Park Fee schedule in effect in the year of payment; the number of exempt dwelling units (e.g. affordable housing units, existing dwelling units to be replaced on site, etc.) included as part of the Project; any Dwelling Unit Construction Tax previously paid by the Project; and, any credits granted by RAP to the Project for improvements to dedicated park land or for eligible privately owned recreational facilities and amenities.

Per LAMC Section 12.33.E.3, any Park Fees collected by the City shall be expended within a certain radius from the project site, as specified below:

a) Neighborhood Park: within a 2-mile radius
b) Community Park: within a 5-mile radius
c) Regional Park: within a 10-mile radius

STAFF ANALYSIS AND RECOMMENDATION

In order for RAP staff to determine which mechanism, land dedication or payment of Park Fees, to recommend for the Board's review and approval, RAP staff analyzes each proposed development project including its location, new population, surrounding parks, any nearby active or proposed park acquisition or park development project, existing park service radius gaps, etc. RAP staff also analyzes any parks, open spaces, or recreational areas anticipated to be provided by each proposed development project in order to determine if those facilities would reduce the need for new public recreation and park facilitates to serve the project residents.

One of the most critical factors that RAP staff uses to analyze proposed developments is existing park service radius gaps. According to the Trust for Public Land 2025 Park Score Index, approximately 62% of residents in the City of Los Angeles live within a 10-minute walk, from a public park or open space. The Mayor's Office of Sustainability pLAn sets a goal of increasing the percentage of Angelenos living within a one-half mile from a park to at least 65% by 2025; 75% by 2035; and 100% by 2050. RAP has employed a variety of strategies, such as the 50 Parks Initiative, that are intended to increase park access and meet these park access goals.

Site Analysis

The Project is located within the Studio City community of the City and within the Sherman Oaks - Studio City - Toluca Lake - Cahuenga Pass Plan Area. Currently, the site is developed with four existing commercial buildings. The Project is located at the Ventura Boulevard Corridor (12501-12665 West Ventura Boulevard) between Ventura Boulevard and Valleyheart Drive along the Los Angeles River. An aerial view of the Project site is attached hereto (Attachment 3). A map showing the generalized zoning of the Project site and the Community Plan Area is also attached (Attachment 4).

The Project is located in a lower-density area of the City. Below is an analysis of the citywide density and local community density:

- City of Los Angeles Population Density (2019-2023 American Community Survey): 8,217 persons per square mile.
- Sherman Oaks - Studio City - Toluca Lake - Cahuenga Pass Community Plan Area (2019-2023 American Community Survey): 6,657 persons per square mile.

Project Open Space and Recreational Areas

The Project includes common open space courtyards, a pool and deck, two indoor pool lounges, a gym/fitness room, a yoga and coffee lounge, two recreation rooms, and private residential balconies.

Although the amount of common open space being provided by the Project meets the minimum amount of open space required per LAMC Section 12.21, it does not appear that these open spaces will include the type and variety of active and passive recreational facilities and amenities that are typically found in the City's Neighborhood and Community Parks and that are needed to meet the needs of residents of all ages and abilities.

As currently proposed, these recreational amenities would not likely reduce the Project's impact on existing public recreational and park facilities. These amenities would not likely significantly reduce the need for new or expanded public recreational and park facilities.

Public Park Access

There is one public park within a half-mile walking distance of the Project site:

Studio City Recreation Center is a Large Neighborhood Park located at 12621 West Rye Street in Studio City. The 8.5-acre park includes a recreation center, open spaces, benches, a playground, four tennis courts, three baseball fields, one basketball court, one childcare center, and one fitness zone.

As previously noted in this Report, a land dedication for a new public park could be located either on-site or off-site of the Project location. If a new public park was provided off-site of the Project location the park would serve the new residents of the Project as well as an unknown number of new, previously unserved, residents within a half-mile walking distance. If the proposed Project does elect to make some or all of its required land dedication off-site, staff would work with the Project to identify a site that would serve project residents, help close an existing park service area gap, and maximize, to the extent feasible, the number of new residents who would be within a half-mile walking distance of a public park.

Staff Recommendation

RAP staff recommends that the appropriate mitigation measure for this proposed Project is the payment of in-lieu fee payment to the City as the Project is proposing the construction of apartment units.

FISCAL IMPACT

The potential Fiscal Impact to the RAP's General Fund is currently unknown.

This Report was prepared by Jeremy Silva, City Planning Associate, Planning, Maintenance and Construction Branch.

LIST OF ATTACHMENTS

1) Attachment 1 - Conceptual Project Renderings and Tract Map
2) Attachment 2 - Advisory Agency Filing Notice VTT-84453-HCA
3) Attachment 3 - Aerial View of Project Site
4) Attachment 4 - Generalized Zoning
5) Attachment 5 - Project Location and Surrounding Parks

Attachment 1



3D VIEW

GENTON PROPERTY GROUP | RC DEVELOPMENT, INC | TORINO | COMPANIES

12555 VENTURA BLVD
STUDIO CITY, CA 91604

PROJECT #2019-10204

DATE ISSUED: 5/16/2025

MVE + PARTNERS

A-9.2



3D VIEW

GENTON PROPERTY GROUP

RC DEVELOPMENT, INC.

TORINO | COMPANIES

12555 VENTURA BLVD
STUDIO CITY, CA 91604

PROJECT #2019-10204

DATE ISSUED: 5/16/2025

MVE + PARTNERS

A-9.3



3D VIEW

GENTON PROPERTY GROUP | RC DEVELOPMENT, INC. | TORINO | COMPANIES

12555 VENTURA BLVD
STUDIO CITY, CA 91604

PROJECT #2019-10204

DATE ISSUED: 5/16/2025

MVE + PARTNERS

A-9.4



3D VIEW

GENTON PROPERTY GROUP | RC DEVELOPMENT, INC. | TORINO | COMPANIES

12555 VENTURA BLVD
STUDIO CITY, CA 91604

PROJECT #2019-10204

DATE ISSUED: 5/16/2025

MVE + PARTNERS



1

3D VIEW

GENTON PROPERTY GROUP | RC DEVELOPMENT, INC. | TORINO | COMPANIES

12555 VENTURA BLVD
STUDIO CITY, CA 91604

PROJECT #2019-10204

DATE ISSUED: 5/16/2025

MVE + PARTNERS

A-9.6



3D VIEW

GENTON PROPERTY GROUP | RC DEVELOPMENT, INC. | TORINO | COMPANIES

12555 VENTURA BLVD
STUDIO CITY, CA 91604

PROJECT #2019-10204

DATE ISSUED: 5/16/2025

MVE + PARTNERS

A-9.7



3D VIEW

GENTON PROPERTY GROUP

RC DEVELOPMENT, INC.

TORINO | COMPANIES

12555 VENTURA BLVD
STUDIO CITY, CA 91604

PROJECT #2019-10204

DATE ISSUED: 5/16/2025

MVE + PARTNERS

A-9.8



3D VIEW

GENTON PROPERTY GROUP | RC DEVELOPMENT, INC. | TORINO | COMPANIES

12555 VENTURA BLVD
STUDIO CITY, CA 91604

PROJECT #2019-10204

DATE ISSUED: 5/16/2025

MVE + PARTNERS

A-9.9



1

3D VIEW

GENTON PROPERTY GROUP | RC DEVELOPMENT, INC. | TORINO | COMPANIES

12555 VENTURA BLVD
STUDIO CITY, CA 91604

PROJECT #2019-10204

DATE ISSUED: 5/16/2025

MVE + PARTNERS | AO Architecture. Design. Relationships.

A-9.10



1

3D VIEW

GENTON PROPERTY GROUP | RC DEVELOPMENT, INC. | TORINO | COMPANIES

12555 VENTURA BLVD
STUDIO CITY, CA 91604

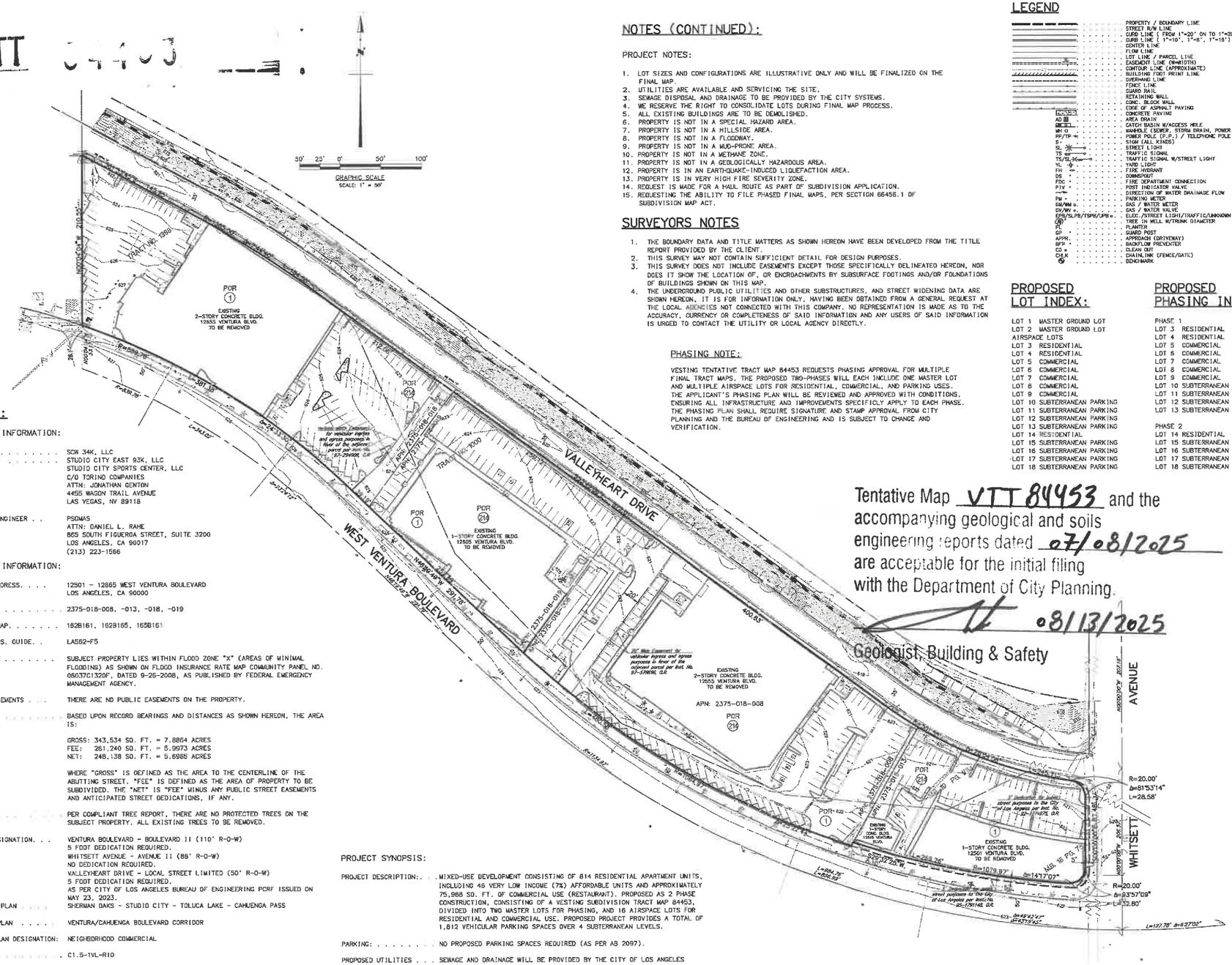
PROJECT #2019-10204

DATE ISSUED: 5/16/2025

MVE + PARTNERS | AO Architecture. Design. Relationships.

A-9.11

VTT 84453


N
50' 25' 0' 50' 100'
GRAPHIC SCALE
SCALE: 1" = 50'
TRACT NO. 1368
POR 1
EXISTING 2-STORY CONCRETE BLDG. 12555 VENTURA BLVD. TO BE REMOVED
POR 214
EXISTING 1-STORY CONCRETE BLDG. 12505 VENTURA BLVD. TO BE REMOVED
VALLEYHEART DRIVE
WEST VENTURA BOULEVARD
APN: 2375-018-008
APN: 2375-018-013
APN: 2375-018-019
APN: 2375-018-018
WHITSETT AVENUE
R=20.00'
Δ=81°53'14"
L=28.58'
R=20.00'
Δ=83°57'09"
L=32.80'
400.83'
N89°39'47"W 291.78'
S29°37'28"W
S89°39'47"E 208.48'
S0°01'37"W 92.10'
S89°39'47"E 209.48'
S0°02'20"E 210.46'
S0°01'37"W 92.10'
S89°39'47"E 208.48'
S0°01'37"W 92.10'
S89°39'47"E 209.48'
S0°02'20"E 210.46

LOS ANGELES DEPT. OF CITY PLANNING
SUBMITTED FOR FILING
☑ TENTATIVE MAP

OCT 14 2025

☐ REVISED MAP ☐ EXTENSION OF TIME
☐ FINAL MAP UNIT ☐ MODIFIED
DEPUTY ADVISORY AGENCY

Attachment 2

CITY OF LOS ANGELES
INTER-DEPARTMENTAL CORRESPONDENCE

DATE: October 20, 2025

TO: Subdivision Committee Members

FROM: Department of City Planning, Valley Project Planning **12501 W VENTURA BLVD, 91604**

SUBJECT: **Subdivision Filing Notification and Distribution (VTT Tentative Tract Map**

Case Number: TT-84453
Map Type: VTT Tentative Tract Map
Map Stamp Date: October 14, 2025
Community Plan: Sherman Oaks - Studio City - Toluca Lake - Cahuenga Pass

Distribution Date: October 20, 2025
Application Filing Date: October 14, 2025
NC: Studio City
Hillside: No

- ☒ Council District: 4
- ☐ Neighborhood Council (NC)(**do NOT** send SB9 Split lot **only**)
- ☒ Bureau of Engineering
- ☒ Dept of Building and Safety - Grading
- ☒ Dept of Building and Safety - Zoning
- ☒ DWP Real Estate
- ☒ DWP Water Distribution Engineering
- ☒ Urban Forestry Land Development
- ☒ Office of Historic Resources
- ☒ Los Angeles Housing Department
- ☒ Animal Regulation
- ☒ LAFD – Engineering/Hydrant Unit
- ☒ Bureau of Street Lighting
- ☒ Department of Recreation and Parks
- ☒ Bureau of Sanitation
- ☒ LAUSD CEQA
- ☒ LAUSD Transportation
- ☒ County Health Department
- ☒ GIS
- ☒ LADOT Dev Review - Valley
- ☐ LADOT Dev Review - Citywide

Hillside Projects/Haul Route Projects Only

Does case include a Haul Route?
☐ **Yes** ☒ **No**

☐ BSS – Haul Route Investigation and Enforcement

LADOT District Office
- ☐ Central (CD 1, 9, 14)
- ☐ Hollywood (CD 4, 10, 13)
- ☐ Western (CD 5, 11)
- ☒ Valley (CD 3, **4**, 5, 6, 7, 12)
- ☐ Southern (CD 8, 15)

RECOMMENDATION REPORTS DUE BY: 39 Days
Please send your reports to the following e-mail address: planning.valleyprojects@lacity.org
Thank you.

Pursuant to Sections 17.50 through 17.60 of the Los Angeles Municipal Code, the attached parcel map/tract map is submitted for your consideration. The Advisory Agency will await your report and recommendation regarding the above matter for 39 days. If we have not received a written report from you after 40 days from the date of filing, we will assume that you have no report to make.

VINCENT P. BERTONI, AICP
Advisory Agency

BLAKE LAMB
Deputy Advisory Agency

LEITHA YOUNG
Administrative Clerk

VALLEY PROJECT PLANNING
planning.valleyprojects @lacity.org

Last Updated 03/08/2023

Attachment 3

ZIMAS INTRANET

LARIAC6 2020 Color-Ortho

06/20/2025

City of Los Angeles
Department of City Planning



Address: 12661 W VENTURA BLVD
APN: 2375018018
PIN #: 165B161 1011

Tract: TR 1368
Block: None
Lot: FR 1
Arb: 1

Zoning: C1.5-1VL-RIO
General Plan: Neighborhood Office Commercial

N
W
E
S

LEGEND

GENERALIZED ZONING

- OS, GW
- A, RA
- RE, RS, R1, RU, RZ, RW1
- R2, RD, RMP, RW2, R3, RAS, R4, R5, PVSP
- CR, C1, C1.5, C2, C4, C5, CW, WC, ADP, LASED, CEC, USC, PPSP, MU, NMU
- CM, MR, CCS, UV, UI, UC, M1, M2, LAX, M3, SL, HJ, HR, NI
- P, PB
- PF

GENERAL PLAN LAND USE

LAND USE

RESIDENTIAL

- Minimum Residential
- Very Low / Very Low I Residential
- Very Low II Residential
- Low / Low I Residential
- Low II Residential
- Low Medium / Low Medium I Residential
- Low Medium II Residential
- Medium Residential
- High Medium Residential
- High Density Residential
- Very High Medium Residential

COMMERCIAL

- Limited Commercial
- Limited Commercial - Mixed Medium Residential
- Highway Oriented Commercial
- Highway Oriented and Limited Commercial
- Highway Oriented Commercial - Mixed Medium Residential
- Neighborhood Office Commercial
- Community Commercial
- Community Commercial -Mixed High Residential
- Regional Center Commercial

INDUSTRIAL

- Commercial Manufacturing
- Limited Manufacturing
- Light Manufacturing
- Heavy Manufacturing
- Hybrid Industrial

PARKING

- Parking Buffer

PORT OF LOS ANGELES

- General / Bulk Cargo - Non Hazardous (Industrial / Commercial)
- General / Bulk Cargo - Hazard
- Commercial Fishing
- Recreation and Commercial
- Intermodal Container Transfer Facility Site

LOS ANGELES INTERNATIONAL AIRPORT

- Airport Landside / Airport Landside Support
- Airport Airside
- LAX Airport Northside

OPEN SPACE / PUBLIC FACILITIES

- Open Space
- Public / Open Space
- Public / Quasi-Public Open Space
- Other Public Open Space
- Public Facilities

FRAMEWORK

COMMERCIAL

- Neighborhood Commercial
- General Commercial
- Community Commercial
- Regional Mixed Commercial

INDUSTRIAL

- Limited Industrial
- Light Industrial

CHAPTER 1A LEGEND

General Plan Designation

- Transit Core
- Traditional Core
- Regional Center
- High Residential
- Community Center
- Village
- Neighborhood Center
- Medium Neighborhood Residential
- Medium Residential
- Low Neighborhood Residential
- Low Medium Residential
- Low Residential
- Compact Residential
- Very Low Residential
- Minimum Residential
- Agriculture
- Hybrid Industrial
- Markets
- Light Industrial
- Production
- Industrial
- Open Space
- Public Facilities
- Public Facilities - Freeways

Zone Use Districts

- Open Space
- Agricultural
- Residential Single Family
- Residential Multiple Family
- Residential-Mixed
- Commercial
- Commercial-Mixed
- Industrial
- Industrial-Mixed
- Public
- Freeway

CIRCULATION

STREET

- Arterial Mountain Road
- Collector Scenic Street
- Collector Street
- Collector Street (Hillside)
- Collector Street (Modified)
- Collector Street (Proposed)
- Country Road
- Divided Major Highway II
- Divided Secondary Scenic Highway
- Local Scenic Road
- Local Street
- Major Highway (Modified)
- Major Highway I
- Major Highway II
- Major Highway II (Modified)
- Major Scenic Highway
- Major Scenic Highway (Modified)
- Major Scenic Highway II
- Mountain Collector Street
- Park Road
- Parkway
- Principal Major Highway
- Private Street
- Scenic Divided Major Highway II
- Scenic Park
- Scenic Parkway
- Secondary Highway
- Secondary Highway (Modified)
- Secondary Scenic Highway
- Special Collector Street
- Super Major Highway

FREEWAYS

- Freeway
- Interchange
- On-Ramp / Off- Ramp
- Railroad
- Scenic Freeway Highway

MISC. LINES

- Airport Boundary
- Bus Line
- Coastal Zone Boundary
- Coastline Boundary
- Collector Scenic Street (Proposed)
- Commercial Areas
- Commercial Center
- Community Redevelopment Project Area
- Country Road
- DWP Power Lines
- Desirable Open Space
- Detached Single Family House
- Endangered Ridgeline
- Equestrian and/or Hiking Trail
- Hiking Trail
- Historical Preservation
- Horsekeeping Area
- Local Street
- MSA Desirable Open Space
- Major Scenic Controls
- Multi-Purpose Trail
- Natural Resource Reserve
- Park Road
- Park Road (Proposed)
- Quasi-Public
- Rapid Transit Line
- Residential Planned Development
- Scenic Highway (Obsolete)
- Secondary Scenic Controls
- Secondary Scenic Highway (Proposed)
- Site Boundary
- Southern California Edison Power
- Special Study Area
- Specific Plan Area
- Stagecoach Line
- Wildlife Corridor

POINTS OF INTEREST

- Alternative Youth Hostel (Proposed)
- Animal Shelter
- Area Library
- Area Library (Proposed)
- Bridge
- Campground
- Campground (Proposed)
- Cemetery
- HW Church
- City Hall
- Community Center
- Community Library
- Community Library (Proposed Expansion)
- Community Library (Proposed)
- Community Park
- Community Park (Proposed Expansion)
- Community Park (Proposed)
- Community Transit Center
- Convalescent Hospital
- Correctional Facility
- Cultural / Historic Site (Proposed)
- Cultural / Historical Site
- Cultural Arts Center
- DMV DMV Office
- DWP DWP
- DWP Pumping Station
- Equestrian Center
- HQ Fire Department Headquarters
- Fire Station
- Fire Station (Proposed Expansion)
- Fire Station (Proposed)
- Fire Supply & Maintenance
- Fire Training Site
- Fireboat Station
- Health Center / Medical Facility
- Helistop
- Historic Monument
- Historical / Cultural Monument
- Horsekeeping Area
- Horsekeeping Area (Proposed)
- Horticultural Center
- Hospital
- Hospital (Proposed)
- HW House of Worship
- e Important Ecological Area
- e Important Ecological Area (Proposed)
- Interpretive Center (Proposed)
- JC Junior College
- M MTA / Metrolink Station
- M MTA Station
- MTA Stop
- MWD MWD Headquarters
- Maintenance Yard
- Municipal Office Building
- P Municipal Parking lot
- Neighborhood Park
- Neighborhood Park (Proposed Expansion)
- Neighborhood Park (Proposed)
- Oil Collection Center
- P Parking Enforcement
- HQ Police Headquarters
- Police Station
- Police Station (Proposed Expansion)
- Police Station (Proposed)
- Police Training site
- PO Post Office
- Power Distribution Station
- Power Distribution Station (Proposed)
- Power Receiving Station
- Power Receiving Station (Proposed)
- C Private College
- E Private Elementary School
- Private Golf Course
- Private Golf Course (Proposed)
- JH Private Junior High School
- PS Private Pre-School
- Private Recreation & Cultural Facility
- SH Private Senior High School
- SF Private Special School
- E Public Elementary (Proposed Expansion)
- E Public Elementary School
- E Public Elementary School (Proposed)
- Public Golf Course
- Public Golf Course (Proposed)
- Public Housing
- Public Housing (Proposed Expansion)
- JH Public Junior High School
- JH Public Junior High School (Proposed)
- MS Public Middle School
- SH Public Senior High School
- SH Public Senior High School (Proposed)
- Pumping Station
- Pumping Station (Proposed)
- Refuse Collection Center
- Regional Library
- Regional Library (Proposed Expansion)
- Regional Library (Proposed)
- Regional Park
- Regional Park (Proposed)
- RPD Residential Plan Development
- Scenic View Site
- Scenic View Site (Proposed)
- ADM School District Headquarters
- SC School Unspecified Loc/Type (Proposed)
- Skill Center
- SS Social Services
- Special Feature
- Special Recreation (a)
- SF Special School Facility
- SF Special School Facility (Proposed)
- Steam Plant
- sm Surface Mining
- Trail & Assembly Area
- Trail & Assembly Area (Proposed)
- UTL Utility Yard
- Water Tank Reservoir
- Wildlife Migration Corridor
- Wildlife Preserve Gate

SCHOOLS/PARKS WITH 500 FT. BUFFER

- Existing School/Park Site
- Planned School/Park Site
- Inside 500 Ft. Buffer

- Aquatic Facilities
- Beaches
- Child Care Centers
- Dog Parks
- Golf Course
- Historic Sites
- Horticulture/Gardens
- Skate Parks
- Other Facilities
- Park / Recreation Centers
- Parks
- Performing / Visual Arts Centers
- Recreation Centers
- Senior Citizen Centers
- Opportunity School
- Charter School
- Elementary School
- Span School
- Special Education School
- High School
- Middle School
- Early Education Center

COASTAL ZONE

- Coastal Commission Permit Area
- Dual Permit Jurisdiction Area
- Single Permit Jurisdiction Area
- Not in Coastal Zone

TRANSIT ORIENTED COMMUNITIES (TOC)

- Tier 1
- Tier 2
- Tier 3
- Tier 4

Note: TOC Tier designation and map layers are for reference purposes only. Eligible projects shall demonstrate compliance with Tier eligibility standards prior to the issuance of any permits or approvals. As transit service changes, eligible TOC Incentive Areas will be updated.

WAIVER OF DEDICATION OR IMPROVEMENT

- Public Work Approval (PWA)
- Waiver of Dedication or Improvement (WDI)

MIXED INCOME INCENTIVE PROGRAM (MIIP)

TRANSIT ORIENTED INCENTIVE AREAS (TOIA)

- T-1
- T-2
- T-3
- Outside of TOIA

OPPORTUNITY CORRIDORS (OC)

- OC-1
- OC-2
- OC-3

CORRIDOR TRANSITION INCENTIVE AREAS (CT)

- CT-1
- CT-2
- CT-3

OTHER SYMBOLS

- Lot Line
- Tract Line
- Lot Cut
- Easement
- Zone Boundary
- Building Line
- Lot Split
- Community Driveway
- Building Outlines 2020
- Building Outlines 2017
- Airport Hazard Zone
- Census Tract
- Coastal Zone
- Council District
- LADBS District Office
- Downtown Parking
- Fault Zone
- Fire District No. 1
- Tract Map
- Parcel Map
- Flood Zone
- Hazardous Waste
- High Wind Zone
- Hillside Grading
- Historic Preservation Overlay Zone
- Specific Plan Area
- Very High Fire Hazard Severity Zone
- Wells - Acitive
- Wells - Inactive

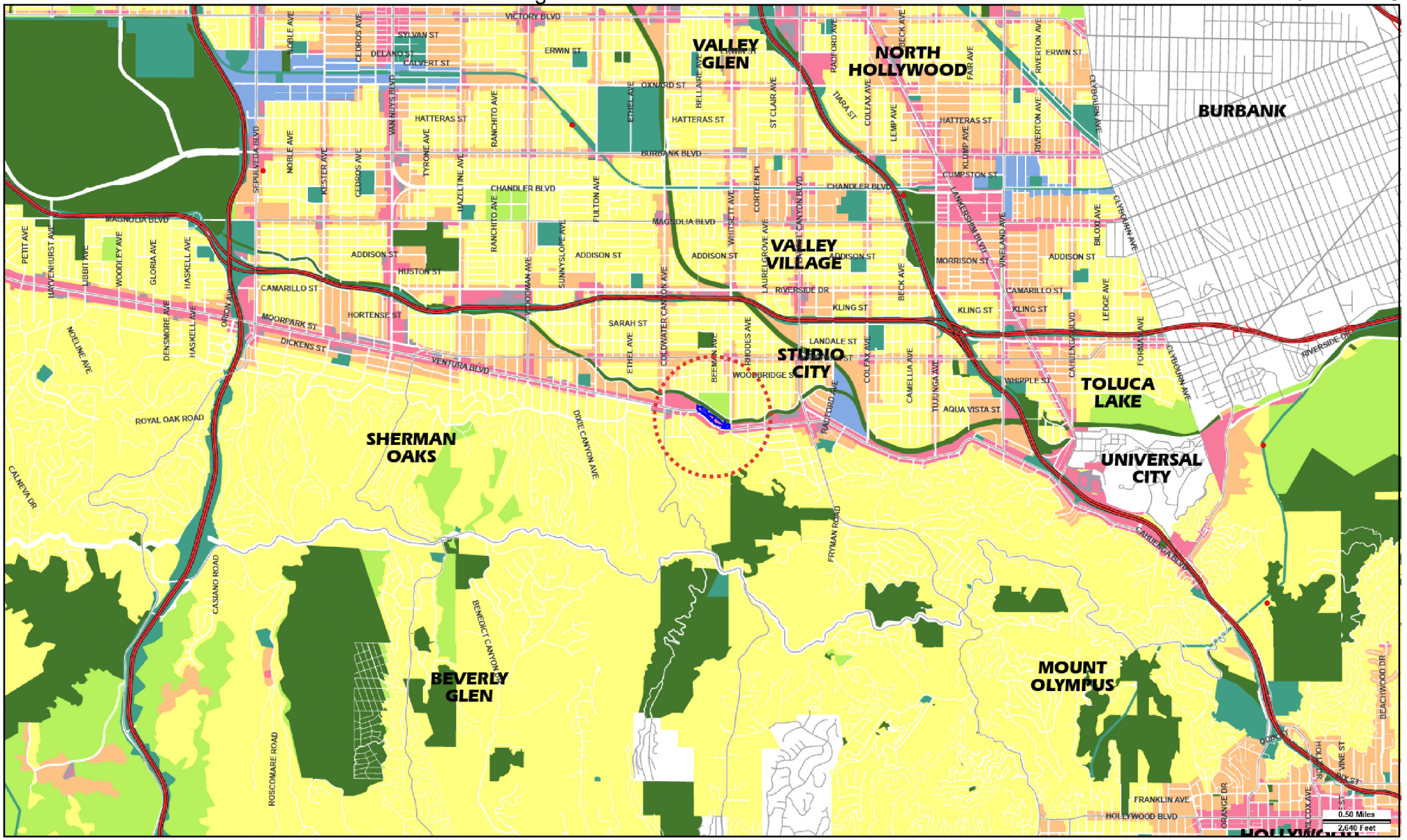
Attachment 4

ZIMAS INTRANET

Generalized Zoning

06/20/2025

City of Los Angeles
Department of City Planning



Address: 12661 W VENTURA BLVD
APN: 2375018018
PIN #: 165B161 1011

Tract: TR 1368
Block: None
Lot: FR 1
Arb: 1

Zoning: C1.5-1VL-RIO
General Plan: Neighborhood Office Commercial

N
W E
S

LEGEND

GENERALIZED ZONING

- OS, GW
- A, RA
- RE, RS, R1, RU, RZ, RW1
- R2, RD, RMP, RW2, R3, RAS, R4, R5, PVSP
- CR, C1, C1.5, C2, C4, C5, CW, WC, ADP, LASED, CEC, USC, PPSP, MU, NMU
- CM, MR, CCS, UV, UI, UC, M1, M2, LAX, M3, SL, HJ, HR, NI
- P, PB
- PF

GENERAL PLAN LAND USE

LAND USE

RESIDENTIAL

- Minimum Residential
- Very Low / Very Low I Residential
- Very Low II Residential
- Low / Low I Residential
- Low II Residential
- Low Medium / Low Medium I Residential
- Low Medium II Residential
- Medium Residential
- High Medium Residential
- High Density Residential
- Very High Medium Residential

COMMERCIAL

- Limited Commercial
- Limited Commercial - Mixed Medium Residential
- Highway Oriented Commercial
- Highway Oriented and Limited Commercial
- Highway Oriented Commercial - Mixed Medium Residential
- Neighborhood Office Commercial
- Community Commercial
- Community Commercial -Mixed High Residential
- Regional Center Commercial

INDUSTRIAL

- Commercial Manufacturing
- Limited Manufacturing
- Light Manufacturing
- Heavy Manufacturing
- Hybrid Industrial

PARKING

- Parking Buffer

PORT OF LOS ANGELES

- General / Bulk Cargo - Non Hazardous (Industrial / Commercial)
- General / Bulk Cargo - Hazard
- Commercial Fishing
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- Intermodal Container Transfer Facility Site

LOS ANGELES INTERNATIONAL AIRPORT

- Airport Landside / Airport Landside Support
- Airport Airside
- LAX Airport Northside

OPEN SPACE / PUBLIC FACILITIES

- Open Space
- Public / Open Space
- Public / Quasi-Public Open Space
- Other Public Open Space
- Public Facilities

FRAMEWORK

COMMERCIAL

- Neighborhood Commercial
- General Commercial
- Community Commercial
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CHAPTER 1A LEGEND

General Plan Designation

- Transit Core
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- Open Space
- Public Facilities
- Public Facilities - Freeways

Zone Use Districts

- Open Space
- Agricultural
- Residential Single Family
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- Residential-Mixed
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- Industrial-Mixed
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CIRCULATION

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- Arterial Mountain Road
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- Scenic Divided Major Highway II
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- Secondary Highway (Modified)
- Secondary Scenic Highway
- Special Collector Street
- Super Major Highway

FREEWAYS

- Freeway
- Interchange
- On-Ramp / Off- Ramp
- Railroad
- Scenic Freeway Highway

MISC. LINES

- Airport Boundary
- Bus Line
- Coastal Zone Boundary
- Coastline Boundary
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- Community Redevelopment Project Area
- Country Road
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- Desirable Open Space
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SCHOOLS/PARKS WITH 500 FT. BUFFER

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COASTAL ZONE

- Coastal Commission Permit Area
- Dual Permit Jurisdiction Area
- Single Permit Jurisdiction Area
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TRANSIT ORIENTED COMMUNITIES (TOC)

- Tier 1
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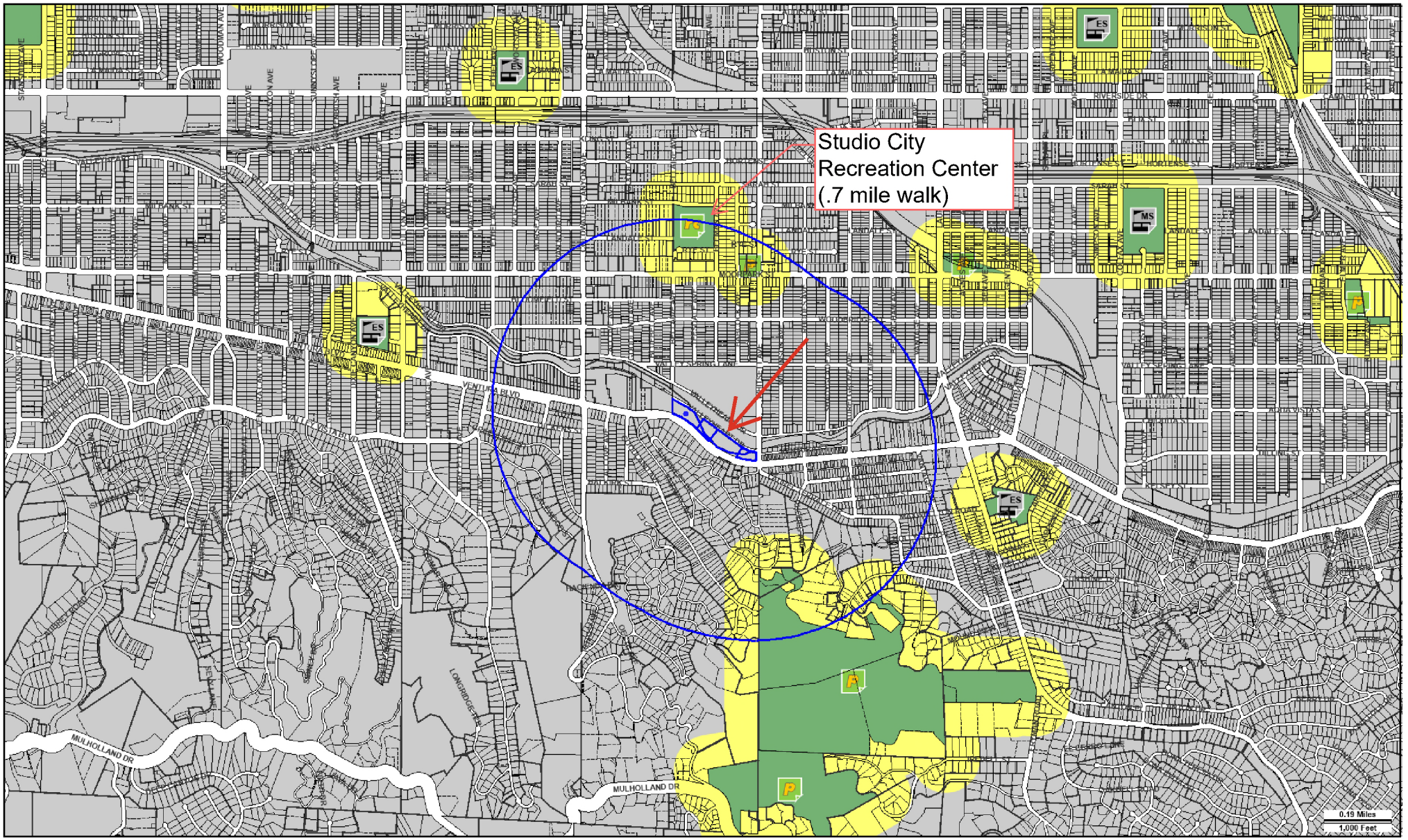
Attachment 5

ZIMAS INTRANET

Schools/Parks w/ .5 mile Buffer

06/20/2025

City of Los Angeles
Department of City Planning



Address: 12661 W VENTURA BLVD
APN: 2375018018
PIN #: 165B161 1011

Tract: TR 1368
Block: None
Lot: FR 1
Arb: 1

Zoning: C1.5-1VL-RIO
General Plan: Neighborhood Office Commercial

N
W E
S

LEGEND

GENERALIZED ZONING

- OS, GW
- A, RA
- RE, RS, R1, RU, RZ, RW1
- R2, RD, RMP, RW2, R3, RAS, R4, R5, PVSP
- CR, C1, C1.5, C2, C4, C5, CW, WC, ADP, LASED, CEC, USC, PPSP, MU, NMU
- CM, MR, CCS, UV, UI, UC, M1, M2, LAX, M3, SL, HJ, HR, NI
- P, PB
- PF

GENERAL PLAN LAND USE

LAND USE

RESIDENTIAL

- Minimum Residential
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- Wells - Acitive
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INITIAL SUBMISSIONS

The following submissions by the public are in compliance with the Commission Rules and Operating Procedures (ROPs), Rule 4.5a. Please note that "compliance" means that the submission complies with deadline, delivery method (hard copy and/or electronic) AND the number of copies. The Commission's ROPs can be accessed at http://planning.lacity.org, by selecting "Commissions & Hearings" and selecting the specific Commission.

The following submissions are not integrated or addressed in the Staff Report but have been distributed to the Commission.

Material which does not comply with the submission rules is not distributed to the Commission.

ENABLE BOOKMARKS ONLINE:

**If you are using Explorer, you will need to enable the Acrobat  toolbar to see the bookmarks on the left side of the screen.

If you are using Chrome, the bookmarks are on the upper right-side of the screen. If you do not want to use the bookmarks, simply scroll through the file.

If you have any questions, please contact the Commission Office at (213) 978-1300.

Greenberg Glusker

Sheri L. Bonstelle
D: 310.201.7546
F: 310.553.0687
SBonstelle@ggfirm.com

May 29, 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 Appeal of VTT-84453 and ENV-2025-5697-SE
Related Case: CPC-2025-5697-DB-PR-S-PPC-MCUP-VHCA
CPC Hearing Date: Thursday, June 11, 2026

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. We respectfully request that the City Planning Commission deny the appeals of the Deputy Advisory Agency's Letter of Determination ("***LOD***") approving Vesting Tentative Tract Map ("***VTTM***") 84453 and approving the statutory CEQA Exemption for urban infill housing development projects, as set forth in Public Resources Code ("***PRC***") section 21080.66. There were three (3) appeals filed by (i) Studio City for Safe Development/ Alex Staikos ("***SCSD Appeal***"), (ii) Studio City Residents Association/ Barry Johnson ("***SCRA Appeal***"), and (iii) Marianne King ("***King Appeal***") (collectively, the "***Appeals***"). The key issues in the Appeals are addressed below. None of the claims in the Appeals are valid or provide substantial evidence necessary to overturn the City's approval of VTTM 84453 or the statutory CEQA Exemption under PRC §21080.66, or provide a preponderance of evidence that there is a specific adverse impact to public health and safety that cannot be mitigated to support denial of the Project under the Housing Accountability Act (("***HAA***", Gov'n Code § 65589.5)).

I. VTTM Approval

VTTM 84453 is a merger and re-subdivision of four legal parcels divided into eight portions with 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 VTTM entitlements also include a Statutory CEQA Exemption for urban infill housing development projects under PRC §21080.66, known as AB130. The City Staff Report, dated April 14, 2026, and the Advisory Agency's LOD, dated April 15, 2026, determined that based on the whole of the record, the Project, including the VTTM, is statutorily exempt from CEQA under AB130.

There is also a related 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 (the "***Density Bonus Project***"). The Deputy Advisory Agency did not act on these entitlements, which the City Planning Commission is considering on June 11, 2026. The VTTM and the Density Bonus Project are entitlements for the same Project, and are considered as a whole in the environmental review.

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

A. <u>The City Reviewed and Approved AB130 Compliance for the VTTM</u>

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 §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)).

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 hearing on the VTTM on April 14, 2026, and 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.

B. The State Legislature Provides A CEQA Exemption For Any Approvals Related to Qualifying Housing Development Projects

The California legislature clearly intended the AB130 statutory CEQA Exemption for housing development projects to include review of a VTTM approved as part of the project. PRC §21080.66 states: "Without limiting any other statutory or categorical exemption, this division does not apply to any aspect of a housing development project, as defined in subdivision (b) of §65905.5 of the Government Code, including any permits, approvals, or public improvements required for the housing development project, as may be required by this division, if the housing development project meets all of the following conditions." The Legislature's use of the phrase "any aspect... including any permits, approvals, or public improvements" is deliberately expansive. A VTTM is unambiguously a "permit" or "approval" required in connection with the housing development project. If PRC §21080.66 was interpreted to statutorily exempt the housing development project from CEQA, but leave the VTTM subject to parallel environmental review, it would undermine this express legislative intent. The City complied with this State directive by identifying PRC §21080.66 as the environmental clearance for the VTTM for this housing development project, and the City has consistently taken the same position with other housing development projects with associated VTTMs.

C. There are No Exceptions to Statutory CEQA Exemptions, including AB130

For 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 categorical 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 statutory CEQA exemption (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. The Project has been determined to qualify for the AB130 CEQA exemption, and therefore no additional environmental review or analysis is required.

The SCSD Appeal, Section V, claims that the cumulative impact of the Project in combination with other ongoing and reasonably foreseeable projects in the immediate vicinity demonstrates potential environmental impact to public health. The nearby projects include the Sportsmen's Lodge redevelopment (12805-12835 Ventura), the Harvard-Westlake athletic center (4047-4155 N. Whitsett Avenue), the Sunset Place Project (12544-12583 Ventura Boulevard), the 12434 Moorpark housing project (ED1,12434 Moorpark Street), the 12750 Moorpark housing project (ED1, 12750 Moorpark Street). The first two projects were approved in the past few years, and the remaining have pending applications. All of these projects were evaluated as individual separate projects; the first three are discretionary projects with CEQA review, and the last two are ministerial projects under Executive Directive 1. However, because the Project qualifies for a statutory CEQA Exemption under AB130, the Project is legally deemed not to have impacts under CEQA, and there is no requirement to evaluate cumulative impacts, and no exception for cumulative impacts of nearby projects under CEQA Guidelines §15300.2(b).

D. The Project Fully Complies with Fire Safety Codes and Regulations

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. 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), City ordinances, and building and fire code requirements. These findings are summarized in detail in Exhibit A. The Dudek Fire Code Analysis is attached 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 Wilafire Management Review***"). In addition, 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 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.

AB130. The SCRA Appeal (Ground 1) claims that the AB130 CEQA Exemption is unavailable, because the Property is located in a VHFHSZ, which is a prohibited location under Gov. Code §65913.4(a)(6)(D); therefore, a Mitigated Negative Declaration is required. The SCRA Appeal quotes from various law firm websites that describe the AB130 exclusions; however, the SCRA Appeal misstates the law. The CEQA Exemption in PRC §21080.66 specifically permits a housing development project in a VHFHSZ if it meets the State law requirements set forth in PRC §4291 and §51182 for defensible space, PRC §4290 for fire safety standards, and CBC §7A, which has been replaces 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). These are analyzed in detail in the Dudek Fire Code Analysis, which was part of the Project application and reviewed by City planning staff in preparation of the City Staff Report. In addition, the SGH Wildfire Management Review identifies the wildfire mitigation measures required by State and local codes that are incorporated in the Project's entitlement documents, and must be cleared as part of the building permit plan check review.

Wildfire Evacuation. The SCRA Appeal (Ground V.B) claims that the Fire Department analysis in the LOD, section 11, fails to provide an evacuation study for the residents including adjacent road capacity analysis during peak hours. In addition, the SCSD Appeal (IV.D) similarly claims that the LOD provides no corridor-level evacuation capacity analysis that includes the other projects on Ventura Boulevard and the existing homes in the hillside area to the south. The SCSD Appeal (II) also identifies that Gov. Code §65302.15 requires each City's General Plan, Safety Element, to be updated to identify evacuation routes and their capacity, safety, and viability and evacuation locations under a range of scenarios.

The City Council adopted a comprehensive update to the General Plan in October 2021, and revised the Safety Element in 2025 to incorporate the requirements of Gov. Code §65302.15. The Safety Element states, "To better accommodate the variety of evacuation scenarios, the City has developed a dynamic approach to evacuation response, one that can respond to different conditions. As specified in the City EOP Evacuations Annex "primary evaluation routes consist of the major interstates, highways, and primary arterials within the City and Los Angeles County." However, in response to a more localized emergency, like a hillside wildfire, the LAFD works in coordination with the Los Angeles Department of Transportation and Los Angeles Police Department to identify the most appropriate local egress option and direct individuals to those routes. Potential routes have been pre-selected based on a number of considerations, but potential evacuation routes will vary based on the type and location of hazard/disaster."

The Fire Department is not required by code to provide a site-specific evacuation procedure as part of a project-specific VTTM review. The Fire Department fully complies with the required analysis by identifying the conditions necessary to meet the standards set forth in the CBC, CWUIC, LABC, and City Fire Code. In addition, the City has an Emergency Operations Plan for Evacuation, dated October 2020, that analyzes the emergency response as a whole for multiple City departments, including using major streets as evacuation routes identified by DOT. This response is modified on a dynamic basis during an emergency, and therefore, the scenario for evacuation changes based on the specific location and details of the earthquake or wildfire.

State Minimum Fire Safety Regulations. The SCSD Appeal (IV.B) claims that the Project does not comply with State Minimum Fire Safe Regulations for projects in a VHFHSZ, as codified in CCR §1270 *et. seq.* The Appeal cites to CCR §1276.01, which requires a minimum 30-foot setback for all buildings from all property lines (for interior property lines) and/or the center of the Road (for road adjacent property line), with certain exceptions in §1276.01(b). The Road is defined as "A public or private vehicular pathway to more than four (4) Residential Units, or to any industrial or commercial Occupancy." (CCP §1270.01) The intent of the regulation is that all buildings are separated by 30 feet, including those on neighboring properties, or the buildings have specific design features that would make them non-combustible in compliant with code. 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 Property is surrounded on three sides by public streets. The buildings in the Project are set back more than 30 feet from the centerline of Whittset Road to the east and Ventura Boulevard to the south, and therefore comply with the requirement, and are set back more than 40 feet on Valleyheart Drive from the LA River. The building on the adjacent property to the west at 12711 Ventura Boulevard is set back more than 30 feet from its property line with a surface parking lot. The westernmost residential building in the Project is setback from the west property line by a 28-foot wide fire lane (which is also a Road per the definition). CCR §1276.01(b) provides an alternative to the 30 foot setback if there is an alternative method to obtain structure-to-structure ignition, which include features such as block walls, non-combustible material extending five feet from the building, hardscape landscaping, reduced window exposure within the 30 foot setback, or the most protective requirements of CBC, Chapter 7A, which is replaced by the 2025 CWUIC, Part 7 (effective 1 January 2026). 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), including the building adjacent to the 28-foot wide fire lane. This analysis is set forth in detail in the attached SGH Wildfire Management Review.

Fire Code Compliance. The Project proposes to develop 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 garage levels. The Project is located in a California Department of Forestry and Fire Protection (CAL FIRE) designated Local Responsibility Area (LRA) VHFHSZ.

The 2025 edition of the California Building Standards Code (Title 24) became effective on January 1, 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 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). The SGH Wildfire Management Review, Appendix B, provides a summary of the code provisions from the legacy CBC Chapter 7A (2022) to CWUIC 2025 Part 7.

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.

Fire Department Report. The Fire Department conditions set forth in the LOD fully analyze and require compliance with the LA Fire Code and State law. As determined by DWP, 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 required 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. These findings are analyzed in detail in the LOD and in the Dudeck Fire Report, and further reviewed in the SGH Wildfire Management Review.

California PRC Section 4290 and Title 14 Fire Safe Regulations. California PRC § 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 §1273); signage and building numbering (Title 14 CCR §1274); water supply and fire hydrants (Title 14 CCR §1275); and fuel modification, greenbelts, and building/parcel siting setbacks (Title 14 CCR §1276 series, including §1276.01 "Building and Parcel Siting and Setbacks"). Because the Property is located in a City of Los Angeles LRA VHFHSZ, California PRC S§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 § 65913.4(a)(6)(D) references California PRC §4290 as one of the named categories of fire mitigation measures.

California PRC Section 4291 and CGC Section 51182 — Defensible Space. 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 the building permit phase.

LAFD, LAMC, and Los Angeles-Specific VHFHSZ Requirements. The Los Angeles Building Code (LABC §§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 §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 §§ 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 building permit phase.

Fire Code Analysis for Urban Infill 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 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.

As set forth in the SGH Wildfire Management Review, Section 6 analysis, the Project fully complies with the required State and Local fire code requirement. Key technical findings include WUI building features, required fire access and water supply and compliant defensible space. In summary, the Class A flat-roof/parapet, concrete podium underfloor enclosure, and predominantly noncombustible exterior cladding are consistent with California Wildland-Urban Interface Code 2025, Part 7, §504. The Composite-panel cladding products specified at construction document phase will satisfy ASTM E136, CCR Title 19 §12-7A-1, or Office of the State Fire Marshal Building Materials Listing Category 8140. The Project complies with the required Fire access and water supply. There are four driveways that access onto two public streets, Valleyheart drive and Ventura Boulevard, with the minimum 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); and aerial fire apparatus can access for the 84 ft Buildings 2, 3, and 4 which will be detailed at the construction document phase per 2026 Los Angeles Fire Code, Appendix D, Section D105. The Project also provides sufficient defensible space. The Project is located in a 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 Gov. Code § 51182.

Because the Project complies with PRC §4291 and §51182, PRC §4290, and CBC §7A/ WCUIC, 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.

III. The Project Complies with Zoning, General Plan, and Specific Plan Standards, as May Be Modified by Density Bonus Incentives and Waivers

The LOD, Findings of Fact (Subdivision Map Act) (pages 16-21), makes the required findings for approval of the VTTM as set forth in Gov. Code §§66473.1, 66474.60, .61 and .63, and as required by LAMC Article 7, and specifically LAMC 17.06.B for Vesting Tentative Tract Maps. The related entitlements for a Density Bonus, Project Review, Project Compliance with the

Specific Plan and a Class 2 Main CUP for alcohol are evaluated in a separate hearing by the City Planning Commission (CPC-2025-5697-DB-PR-S-PPC-MCUP-VHCA). The LOD approving the VTTM specifically identifies the separate related Density Bonus entitlements, and confirms that the LOD is not approving the additional density, incentives or waivers in the Density Bonus application.

The SCRA Appeal (Ground 4) claims that the LOD approving the VTTM cannot defer the approval of the density to LADBS review. In fact, the City planning department has a legally vetted parallel procedure for simultaneously reviewing the VTTM by the Advisory Agency and reviewing the Density Bonus incentives and waivers, and other entitlements by the Planning Commission. (LAMC §17.06.B, LAMC §12.22.A.25) The Planning Commission Hearing Officer holds a joint hearing with the Advisory Agency, and then, the Planning Commission reviews the Hearing Officer report and holds a public hearing on the Density Bonus and other entitlements. The Proposed Map and the Design or Improvement of the VTTM was found to be consistent with the General Plan and Specific Plan. As stated in the LOD, "Design refers to the configuration and layout of the proposed lots in addition to the proposed site plan layout. Pursuant to §66427(a) of the Subdivision Map Act, the location of the buildings is not considered a part of the approval or disapproval of the map by the Advisory Agency." (LOD, page 18) Therefore, the LOD did not approve the density, which will be considered in the Density Bonus Project review by the Planning Commission. This is not a deferral of the review, but rather an acknowledgement of the parallel review process. LADBS will not provide clearance as part of building permit review until both the VTTM and Density Bonus Project are approved and conditioned through the City planning review process.

The SCRA Appeal (Ground 3) claims that the Advisory agency does not cite any authority for approving additional height. In addition, the SCRA Appeal states that the height would alter the character of the low-rise buildings on Ventura Boulevard. As stated above, the Density Bonus Project is under review by the City Planning Commission, and was not reviewed by the Advisory Agency. The location or design of the buildings were not considered as part of the approval, and the height was not approved as part of the LOD for the VTTM. The height waiver under the Density Bonus entitlement will be evaluated by the Planning Commission. Gov.Code §65915(e) permits waivers of development standards in Density Bonus projects, such as height, that physically preclude the construction of a housing development at the permitted density or with approved incentives. Therefore, if a Project provides a certain amount of affordable housing units to qualify for a specific density, then the City must provide waivers of development standards that would otherwise physically preclude construction at that density.

The SCRA Appeal (Ground 6) similarly claims that the Specific Plan and River Improvement Overlay District ("***RIO***") review were impermissibly deferred. In fact, the LOD found that the VTTM, including the configuration and layout of the proposed lots in addition to the proposed site plan layout, were consistent with the Specific Plan, and made the required findings (LOD, p.17-18) The LOD identified a standard RIO Administrative Clearance procedure that exists as part of the LADBS building permit clearance process.

The SCRA Appeal (Ground 5) claims that the LOD fails to clarify the affordability levels and calculation for the affordable units in the Project. However, the LOD for the VTTM did not

approve any level of affordability or review the Density Bonus Project, which will be evaluated by the Planning Commission. For the Density Bonus review, the Project has 654 base units, and provides 7% of the base units, which is 46 units, as affordable to very low income households. With the Density Bonus, the Project has a total of 814 units. This level of affordability was confirmed by the Los Angeles Housing Department through review of the Affordable Housing Referral Form.

The related case requests entitlements for the Density Bonus Project, including off-menu incentives and waivers, Project Review for developments creating 50 or more dwelling units, and Project Compliance Review with 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. The Deputy Advisory Agency did not act on these entitlements, which the City Planning Commission is considering on June 11, 2026. The VTTM and the Density Bonus Project are entitlements for the same Project, and are considered as a whole in the environmental review.

IV. The City Made the Required Findings for a VTTM Approval

The SCSD Appeal claims that, even if the housing development project is exempt from CEQA pursuant to PRC §21080.66, the VTTM requires separate environmental and public health findings under the Subdivision Map Act. The SCRA Appeal cites Gov. Code §§66474(e) and (f), which require certain "negative" findings - including disapproval of a project upon a finding that the design of the subdivision or the proposed improvements are likely to cause substantial environmental damage, substantially and avoidably injure fish or wildlife or their habitat, or are likely to cause serious public health problems. The SCSD Appeal also cites *Topanga Ass'n for a Scenic Cmty. v. County of L.A.* (1989) 214 Cal.App.3d 1348 in support. The SCSD Appeals then tries to argue that full CEQA environmental review is required to make these "negative" substantial harm findings, even though the Project is statutorily exempt from CEQA. Similarly, the SCRA Appeal (Ground 7) claims that the Findings of Fact are conclusory, and provide no analysis of issues such as liquefaction hazard, fire-evacuation capacity, and suitability for density. These claims have no merit.

Pursuant to the Subdivision Map Act, Gov. Code §66427, the design and location of buildings are not part of the map review process for apartment buildings. As stated in the LOD, "Design refers to the configuration and layout of the proposed lots in addition to the proposed site plan layout. Pursuant to §66427(a) of the Subdivision Map Act, the location of the buildings is not considered a part of the approval or disapproval of the map by the Advisory Agency." (LOD, page 18) Therefore, the Advisory Agency considered the configuration of the lots and the layout on the site plan, but was not required to evaluate the project density, which is subject to the related Density Bonus Project review by the Planning Commission.

No Substantial Environmental Damage or Substantial Injury to Wildlife or Habitat. First, the LOD affirmatively made the findings that the design of the subdivision or the proposed improvements are <u>not</u> likely to cause substantial environmental damage, or substantially and avoidably injure fish or wildlife or their habitat, and are <u>not</u> likely to cause serious public health

problems. (LOD, page 20) The LOD identified that the project site is currently developed with commercial buildings and surface parking, and there are no identified fish, wildlife or established habitat located on site. The Applicant provided substantial evidence that there was no habitat for protected species through its tree reports and biological analysis required for City Department reports.

No Serious Public Health Problems. In addition, the LOD confirmed that the Project was not likely to cause serious health problems. The LOD found that the development will be connected to the City's sanitary sewer system, which will be directed to the LA Hyperion Treatment Plant that complies with Statewide ocean discharge standards. BOE also reported that the VTTM will not violate the California Water Code, because it will connect to the public sewer system and have only a minor incremental impact on the quality of the effluent from the Hyperion Treatment Plant. (LOD, page 20)

The LOD did not just make cursory conclusions. The LOD provides full analysis of the required findings as set forth in the Findings of Fact (Subdivision Map Act), and the City Departments' review, analysis and conditions – all of which are included in the LOD. In the Findings of Fact, the LOD cites to the BOE report to show that the project connects to safe sewer and water systems, and that the project site is a fully developed commercial property with retail stores and parking lot, and that no protected habitat exists on site. These findings are fully analyzed in the LOD, pages 16-21, and supported by the conditions of the various departments, including the Bureau of Engineering ("***BOE***"), Department of Building and Safety, Grading and Zoning ("***DBS***"), Department of Transportation ("***DOT***"), Fire Department, Department of Water and Power ("***DWP***"), Bureau of Street Lighting, Bureau of Sanitation, Information Technology, Department of Recreation and Parks, the Urban Forestry Division, and the Department of City Planning – Site Specific Conditions, set forth on LOD, pages 2-8. The Deputy Advisory Agency relied on the thorough review and analysis of each of the separate Departments, in their reports, to provide substantial evidence to support the LOD findings. Therefore, the LOD makes the required findings that the subdivision and improvements are not likely to cause substantial and serious harm. SCRA provides no evidence that the subdivision or proposed improvements are likely to cause substantial environmental damage, likely to substantially and avoidably injure fish or wildlife or their habitat, or are likely to cause serious public health problems. This claim is just conjecture without any basis in fact.

No Substantial Impact to Palm Tree Habitat. The SCSD Appeal claims that the removal of approximately 93 palm trees, including 22 onsite Mexican fan palms (*Washingtonia robusta*), 8 king palms (*Archontophoenix cunninghamiana*), 19 queen palms (*Syagrus romanzoffiana*), and 44 pygmy date palms (*Phoenix roebelenii*), which provide habitat for the western yellow bat, will substantially injure wildlife or its habitat. As evidence, the SCRA Appeal attached a western bat study from 2022 provided in opposition to the Harvard-Westlake Project, which is a recreational facility located on a former golf course across the river from the Project site. The report states that the western yellow bat (*Lasiurus xanthinus*) is a California Species of Special Concern that appears to roost exclusively in the skirts of palm trees located near open water or wetlands. However, as acknowledged in the report, the Harvard-Westlake EIR did not evaluate whether any bats actually existed on site, and the report noted that the loss of one active bat roost from the Project site would not have a substantial adverse effect on the western yellow bat population. In addition, the

Harvard-Westlake site was a former golf course with significant trees and landscaping and minimal traffic, which is a suitable area for nesting birds. It is significantly different from the Project site, and so the study does not provide substantial evidence for the conditions on the Project site.

The Project site is a fully developed commercial retail center with big box stores and a large surface parking lot with lighting that often had significant vehicular and pedestrian traffic. There has been no evidence of any western yellow bat on the Property. The palm trees are being removed in part because the LAFD strongly recommends removing palm trees in a VHFHSZ due to the high flammability of certain genus and species of palms. (https://lafd.org/palms-and-wildfires-and-ab3074) In addition, the proposed Project will provide significant tree replacement, in compliance with Urban Forestry regulations, with residential buildings and underground parking that will make a more suitable environment for bird habitat in the future.

No Cumulative Impact to Habitat. The SCSD Appeal also claims, without any evidence, that the birds that were formerly nesting and foraging in the mature trees on the Harvard-Westlake golf course have now moved into the palms and other trees on the Project site's parking lot. The Appeal claims that it would cause these nesting and foraging birds to move again creating cumulative impacts. The Deputy Advisory Agency was only required to make findings related to the Subdivision Map Act, including whether the configuration and layout of the proposed lots or proposed site plan layout substantially and avoidably injured wildlife or their habitat. Here, the trees on the Property will be replaced in compliance with Urban Forestry standards and subject to review and conditions by Urban Forestry, and so there will be no permanent loss of habitat caused by the site plan layout. As stated, the Project is not required to review cumulative impacts as it is statutorily exempt from CEQA under PRC §21080.66.

No Substantial Impact to Wildlife or Habitat by 10 LED Streetlights. The SCSD Appeal claims that the ten (10) new LED streetlights on Valleyheart Drive will introduce substantial new artificial light into the LA River Open Space corridor, which provides nocturnal foraging and movement habitat for bats, birds and other species. Similarly, The King Appeal opposes the installation of ten (10) new streetlights on Valleyheart Drive based on concerns to nocturnal wildlife. In fact, the current Project site is a large parking lot and commercial center with significant night lighting on the parking lot and on the entry to the big box stores for safety reasons. The new LED streetlights will be shielded and the light will be focused on the street and sidewalk to support safety and security of pedestrians and vehicles at night. There is no evidence that the new LED streetlights will provide more light than the existing large commercial center. In addition, there is no evidence that the additional light will cause any harm to birds living adjacent to a major commercial corridor.

Streetlights are necessary for safety of vehicles and pedestrians, especially on streets with limited traffic, such as along the LA River. In fact, according to a randomized control trial conducted by the University of Chicago "increased levels of lighting led to a 36% reduction in "index crimes"— a subset of serious felony crimes that includes murder, robbery and aggravated assault, as well as certain property crimes — that took place outdoors at night in developments that received new lighting, with an overall 4% percent reduction in index crimes." Various studies have concluded that good quality street lighting reduces the accident rate by increasing overall visibility. Driving at night is also more dangerous. Only a quarter of all travel by car drivers is

between the hours of 7pm and 8am, yet this period accounts for 40% of fatal and serious injuries. (https://lalights.lacity.org/residents/stlighting_and_benefits_of_stlights.html) Therefore, the Bureau of Street Lighting determines the number of streetlights necessary for a new development to support pedestrian and vehicle safety at night.

The SCSD Appeal and King Appeal provide no evidence of any potential impact to wildlife based on new LED streetlighting, and the claim is only conjecture without any support. The Project entitlements are statutorily exempt from CEQA under AB130, and therefore a lighting study was not required.

No Public Harm Caused By Code-Compliant Buildings within the VHFHSZ. The SCSD Appeal claims that developing any Project in a VHFHSZ creates a public harm, and claims that the Project does not comply with the State Minimum Fire Safe Regulations. These claims are unfounded. The Project fully complies with the LA Fire Code and the setbacks in the State Minimum Fire Safe Regulations as described in detail above. The VHFHSZ has higher fire safety standards, but if a Project complies with the regulations, there is no separate finding of public harm.

V. Additional Issues

A. Parkway on Valleyheart Drive

The King Appeal requests numerous design changes that were not required by code or law. The King Appeal requests a parkway along Valleyheart Drive in lieu of the proposed 10-foot sidewalk on the south side of Valleyheart Drive within the City right of way (BOE Letter, Condition No. S-3(i)(3)) The City sidewalk width was conditioned by BOE and complies with City's street standards approved as part of the Mobility Plan 2035. The Applicant is not requesting to alter these BOE standards. Therefore, the King Appeal requested a deviation from current code and policy that is not required by law.

B. Landscape Plan and Building Shade

The King Appeal claims that the Landscape Plan does not replace sufficient trees on site, and does not include sufficient native trees in compliance with the LA River Master Plan. This misstates the Project application, and the Project fully complies with the code requirements, including the LA River Master Plan. The Urban Forestry Department provides standards for replacement trees, approves the tree replacement type, location and size, and provides clearance during the building permitting phase. The King Appeal also claims that the shade from the building could impact habitat along the LA River. The King Appeal does not identify any habitat for protected species that exists immediately north of the Project along the LA River. In addition, the Project contains three U-shaped residential buildings that allow for sun on the north side of the building during various times of the day. Therefore, there is no evidence that the building shade will harm the existing trees along the LA River.

C. The Advisory Agency Fully Complied with Due Process Required by the LAMC, City Policy and AB130

The SCRA Appeal makes numerous claims related to the expedited processing and review based on the State-mandated time frames required for AB130, PRC §21080.66. AB130 has intentional expedited review to reduce the time and cost of evaluating housing development projects to encourage the construction of new housing to meet each city and county's Regional Housing Needs Assessment allocations. Specifically, PRC §21080.66 requires that each application be reviewed and an incomplete letter be issued within 30 days after submission; the city must distribute notices for tribal consultation, allow time for consideration and review, and complete consultation within 148 days after the application is deemed complete; and, the city must make a final decision on the project within 30 days after the completion of the tribal consultation or the application is deemed approved (PRC §21080.66). Based on this timeline, discretionary review of housing development project entitlements that would previously take 18 to 24 months can now be completed in 7 to 9 months.

The Applicant filed the Project application on October 10, 2025; the City completed tribal consultation on January 29, 2026; and the City deemed the application complete on March 16, 2026. The City was required to hold a hearing and make a final determination on the Project within 30 days by April 15, 2026. The Deputy Advisory Agency and Hearing Officer held a joint hearing on April 14, 2026, and the Deputy Advisory Agency issued the LOD on April 15, 2026. The Applicant also presented the Project to the Studio City Neighborhood Council ("SCNC") for preliminary review in January 2026. The SCNC Land Use Committee held hearings on the Project on April 30, 2026 and May 13, 2026, and the SCNC Board held a hearing on May 27, 2026. The SCNC has scheduled subsequent hearings on June 4, 2026 and June 8, 2026. The Planning Commission hearing on the Density Bonus Project entitlements and the LOD appeal is scheduled for June 11, 2026.

The SCRA Appeal (Ground 8) claims that there are procedural irregularities because the Deputy Advisory Agency issued its LOD one day after the hearing, and there was not time for the community to consider the testimony at the hearing. Although prior Advisory Agency determinations were often not issued for weeks, this delay actually cost significant time and money to the housing applicants. The one-day turn around was mandated by the timeframes set forth in PRC § 21080.66 to expedite and streamline housing development project review. The SCRA Appeal also questions why the environmental review was identified as EAF and changed to SE. The Applicant filed for a statutory CEQA exemption under AB130, but City planning required the EAF designation while it determined that the Project qualified for AB130. There is no irregularity in the processing – this is the City planning department's standard procedure for AB130 review.

The SCRA Appeal provides a comparison of the Sportsmen's Lodge project and review process and the Riverwalk project review and process. The Sportsmen's Lodge project included a 530-unit mixed use project with a hotel and commercial uses, which were evaluated with a SCEA. The SCRA Appeal notes that the Riverwalk Project is an 814-unit mixed use project that is exempt from CEQA, and states that this is "a step in the wrong direction". However, the SCRA Appeal does not identify any code violations with processing the Riverwalk project, and merely states its disapproval of a State mandated CEQA Exemption that provides streamlined review. The

SCRA Appeal notes that it brought a petition for writ of mandate against the Sportsmen's Lodge in court, and states that the petition for writ of mandate against the Riverwalk project is "not yet filed." AB130 was signed into law by the Governor on June 30, 2025, and so was not available to the Sportsmen's Lodge project. However, many housing development projects will be CEQA exempt under AB130 and require streamlined processing in the future.

The SCRA Appeal also identifies a "Right-Sized Alternative," which includes a four-story 400-unit project with 8,000 square foot commercial space and two levels of subterranean parking evaluated with a full EIR. This proposed alternative would violate the State Density Bonus Law and Housing Accountability Act by requiring a reduction in density despite the Project providing the required affordability levels for a density bonus and related incentives and waivers under State law.

D. Housing Crisis Act

The SCRA Appeal (Ground 2) claims that the SB330 vesting under the State Housing Crisis Act is not allowed for Projects in a VHFHSZ. The Project is vested through the approval of the Vested Tentative Tract Map. The City requires SB330 review for any project that is located on the City Housing Element sites inventory, and the Applicant appropriately filled out the SB330 application and checked that the Property was within the VHFHSZ.

E. Excavation and Haul Route

The SCRA Appeal, section V.C and D, claims a potential construction impact caused by the haul route and the excavation of soil in a liquefaction area without any evidence. The soil excavation was fully evaluated in the Geology and Soils Report Approval, dated August 11, 2025, by the LADBS Grading Division. The haul route was reviewed and approved by the Deputy Advisory agency with numerous conditions set forth in LOD, page 10-11, including street limitations, time and duration limits, total daily trip limits, cleaning and watering conditions, and safety and flagmen requirements. These are standard conditions included with the approval of any haul routes, and the approval limits the roads utilized to Ventura Boulevard, Coldwater Canyon Avenue, US101, US405, US 5, Roxford Street, Sepulveda boulevard, San Fernando Road and Sunshine Canyon Road. There is no significant impact identified for the standard approved haul route, and the haul route, as an approval related to the Project, is exempt from CEQA under PRC PRC §21080.66.

VI. 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'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. 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)

The Project does not cause any specific, adverse impacts to public health or safety, and none of the Appeals provide a preponderance of evidence to show a specific, adverse impact of public health and safety sufficient overturn the City's approval of VTTM 84453 and the statutory CEQA Exemption under AB130.

VII. Conclusion

We respectfully request that the City Planning Commission uphold the Deputy Advisory Agency approval of the VTTM and the approval of the statutory CEQA Exemption under PRC §21080.66, and deny the three Appeals in their entirety.

Sincerely,

Sheri Bonstelle

Sheri L. Bonstelle

SLB
Enclosures
Exhibit A – AB130 Chart
Exhibit B – Dudek Fire Safety Analysis
Exhibit C – SGH Wildfire Management Review

cc: Mashael Majid, CD 4 Deputy Chief of Staff (Mashael.majid@lacity.org)
Adrineh Melkonian, City planner (adrineh.melkonian@lacity.org)

EXHIBIT A

AB130 – CEQA Statutory Infill Exemption Checklist and Findings
Public Resources Code 21080.66 Section 59

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 Except for Density Bonus and incentives/waivers for density, FAR, lot coverage, height, rear yard setback, transitional height, averaging setbacks.	Yes
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

AB130 – CEQA Statutory Infill Exemption Checklist and Findings
Public Resources Code 21080.66 Section 59

No.	Code	Standard	Project	Comply
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
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	No residential use on Property, and no residential use within prior 10 years.	Yes

AB130 – CEQA Statutory Infill Exemption Checklist and Findings
Public Resources Code 21080.66 Section 59

No.	Code	Standard	Project	Comply
		- **historic structure** on the national, state or local historic register - housing units occupied by tenants, and the units were subsequently offered for sale	No registered historic structure on federal, state or local register	
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	Will provide 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: -- Preliminary endangerment assessment req'd if environmental condition found - If release of hazardous material, release shall be removed and any effects mitigated to regulatory levels prior to C of O - If exposure to significant hazards on surrounding property, mitigate to regulatory levels prior to C of O.	Will provide Phase I as condition of approval	Yes
22.	PRC 21080.66.(c)(2)	For housing within **500 feet of a freeway**: - HVAC - Outdoor intakes face away from freeway - Air filtration ERV 16 - Air filtration replacement - No balconies facing 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

AB130 – CEQA Statutory Infill Exemption Checklist and Findings
Public Resources Code 21080.66 Section 59

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 a 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 (PC 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.

AB130 – CEQA Statutory Infill Exemption Checklist and Findings
Public Resources Code 21080.66 Section 59

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.

II. Relevant Code Sections

PRC 21080.66.(a) Without limiting any other statutory or categorical exemption, this division does not apply to any aspect of a housing development project, as defined in subdivision (b) of Section 65905.5 of the Government Code, including any permits, approvals, or public improvements required for the housing development project, as may be required by this division, if the housing development project meets all of the following conditions:

(1) (A) Except as provided in subparagraph (B), the project site is not more than 20 acres.

(B) The project site or the parcel size for a builder's remedy project, as defined in paragraph (11) of subdivision (h) of Section 65589.5 of the Government Code, or the project site or the parcel size for a project that applied pursuant to paragraph (5) of subdivision (d) of Section 65589.5 of the Government Code as it read before January 1, 2025, is not more than five acres.

(2) The project site meets either of the following criteria:

(A) Is located within the boundaries of an incorporated municipality.

(B) Is located within an urban area, as defined by the United States Census Bureau.

(3) The project site meets any of the following criteria:

(A) Has been previously developed with an urban use.

(B) At least 75 percent of the perimeter of the site adjoins parcels that are developed with urban uses.

(C) At least 75 percent of the area within a one-quarter mile radius of the site is developed with urban uses.

(D) For sites with four sides, at least three out of four sides are developed with urban uses and at least two-thirds of the perimeter of the site adjoins parcels that are developed with urban uses.

(4) (A) The project is consistent with the applicable general plan and zoning ordinance, as well as any applicable local coastal program as defined in Section 30108.6. For purposes of this section, a housing development project shall be deemed consistent with the applicable general plan and zoning ordinance, and any applicable local coastal program, if there is substantial evidence that would allow a reasonable person to conclude that the housing development project is consistent.

(B) If the zoning and general plan are not consistent with one another, a project shall be deemed consistent with both if the project is consistent with one.

(C) The approval of a density bonus, incentives or concessions, waivers or reductions of development standards, and reduced parking ratios pursuant to Section 65915 of the Government Code shall not be grounds for determining that the project is inconsistent with the applicable general plan, zoning ordinance, or local coastal program.

(5) The project will be at least one-half of the applicable density specified in subparagraph (B) of paragraph (3) of subdivision (c) of Section 65583.2 of the Government Code.

(6) The project satisfies the requirements specified in paragraph (6) of subdivision (a) of Section 65913.4 of the Government Code.

(7) The project does not require the demolition of a historic structure that was placed on a national, state, or local historic register before the date a preliminary application was submitted for the project pursuant to Section 65941.1 of the Government Code.

(8) For a project that was deemed complete pursuant to paragraph (5) of subdivision (h) of Section 65589.5 of the Government Code on or after January 1, 2025, no portion of the project is designated for use as a hotel, motel, bed and breakfast inn, or other transient lodging. For the purposes of this section, "other transient lodging" does not include either of the following:

(A) A residential hotel, as defined in Section 50519 of the Health and Safety Code.

(B) After the issuance of a certificate of occupancy, a resident's use or marketing of a unit as short-term lodging, as defined in Section 17568.8 of the Business and Professions Code, in a manner consistent with local law.

Gov'n Code 65583.2(c)(3)(B) The following densities shall be deemed appropriate to accommodate housing for lower income households:

(i) For an incorporated city within a nonmetropolitan county and for a nonmetropolitan county that has a micropolitan area: sites allowing at least 15 units per acre.

(ii) For an unincorporated area in a nonmetropolitan county not included in clause (i): sites allowing at least 10 units per acre.

(iii) For a suburban jurisdiction: sites allowing at least 20 units per acre.

(iv) For a jurisdiction in a metropolitan county: sites allowing at least 30 units per acre.

Gov'n Code 65913.4 (a)(6) The development is not located on a site that is any of the following:

(A) (i) An area of the coastal zone subject to paragraph (1) or (2) of subdivision (a) of Section 30603 of the Public Resources Code.

(ii) An area of the coastal zone that is not subject to a certified local coastal program or a certified land use plan.

(iii) An area of the coastal zone that is vulnerable to five feet of sea level rise, as determined by the National Oceanic and Atmospheric Administration, the Ocean Protection Council, the United States Geological Survey, the University of California, or a local government's coastal hazards vulnerability assessment.

(iv) In a parcel within the coastal zone that is not zoned for multifamily housing.

(v) In a parcel in the coastal zone and located on either of the following:

(I) On, or within a 100-foot radius of, a wetland, as defined in Section 30121 of the Public Resources Code.

(II) On prime agricultural land, as defined in Sections 30113 and 30241 of the Public Resources Code.

(B) Either prime farmland or farmland of statewide importance, as defined pursuant to the United States Department of Agriculture land inventory and monitoring criteria, as modified for California, and designated on the maps prepared by the Farmland Mapping and Monitoring Program of the Department of Conservation, or land zoned or designated for agricultural protection or preservation by a local ballot measure that was approved by the voters of that jurisdiction.

(C) Wetlands, as defined in the United States Fish and Wildlife Service Manual, Part 660 FW 2 (June 21, 1993).

(D) Within a very high fire hazard severity zone, as determined by the Department of Forestry and Fire Protection pursuant to Section 51178, or within the state responsibility area, as defined in Section 4102 of the Public Resources Code. This subparagraph does not apply to sites that have adopted fire hazard mitigation measures pursuant to existing building standards or state fire mitigation measures applicable to the development, including, but not limited to, standards established under all of the following or their successor provisions:

(i) Section 4291 of the Public Resources Code or Section 51182, as applicable.

(ii) Section 4290 of the Public Resources Code.

(iii) Chapter 7A of the California Building Code (Title 24 of the California Code of Regulations).

(E) A hazardous waste site that is listed pursuant to Section 65962.5 or a hazardous waste site designated by the Department of Toxic Substances Control pursuant to Section 25356 of the Health and Safety Code, unless either of the following apply:

(i) The site is an underground storage tank site that received a uniform closure letter issued pursuant to subdivision (g) of Section 25296.10 of the Health and Safety Code based on closure criteria established by the

State Water Resources Control Board for residential use or residential mixed uses. This section does not alter or change the conditions to remove a site from the list of hazardous waste sites listed pursuant to Section 65962.5.

(ii) The State Department of Public Health, State Water Resources Control Board, Department of Toxic Substances Control, or a local agency making a determination pursuant to subdivision (c) of Section 25296.10 of the Health and Safety Code, has otherwise determined that the site is suitable for residential use or residential mixed uses.

(F) Within a delineated earthquake fault zone as determined by the State Geologist in any official maps published by the State Geologist, unless the development complies with applicable seismic protection building code standards adopted by the California Building Standards Commission under the California Building Standards Law (Part 2.5 (commencing with Section 18901) of Division 13 of the Health and Safety Code), and by any local building department under Chapter 12.2 (commencing with Section 8875) of Division 1 of Title 2.

(G) Within a special flood hazard area subject to inundation by the 1 percent annual chance flood (100-year flood) as determined by the Federal Emergency Management Agency in any official maps published by the Federal Emergency Management Agency. If a development proponent is able to satisfy all applicable federal qualifying criteria in order to provide that the site satisfies this subparagraph and is otherwise eligible for streamlined approval under this section, a local government shall not deny the application on the basis that the development proponent did not comply with any additional permit requirement, standard, or action adopted by that local government that is applicable to that site. A development may be located on a site described in this subparagraph if either of the following are met:

(i) The site has been subject to a Letter of Map Revision prepared by the Federal Emergency Management Agency and issued to the local jurisdiction.

(ii) The site meets Federal Emergency Management Agency requirements necessary to meet minimum flood plain management criteria of the National Flood Insurance Program pursuant to Part 59 (commencing with Section 59.1) and Part 60 (commencing with Section 60.1) of Subchapter B of Chapter I of Title 44 of the Code of Federal Regulations.

(H) Within a regulatory floodway as determined by the Federal Emergency Management Agency in any official maps published by the Federal Emergency Management Agency, unless the development has received a no-rise certification in accordance with Section 60.3(d)(3) of Title 44 of the Code of Federal Regulations. If a development proponent is able to satisfy all applicable federal qualifying criteria in order to provide that the site satisfies this subparagraph and is otherwise eligible for streamlined approval under this section, a local government shall not deny the application on the basis that the development proponent did not comply with any additional permit requirement, standard, or action adopted by that local government that is applicable to that site.

(I) Lands identified for conservation in an adopted natural community conservation plan pursuant to the Natural Community Conservation Planning Act (Chapter 10 (commencing with Section 2800) of Division 3 of the Fish and Game Code), habitat conservation plan pursuant to the federal Endangered Species Act of 1973 (16 U.S.C. Sec. 1531 et seq.), or other adopted natural resource protection plan.

(J) Habitat for protected species identified as candidate, sensitive, or species of special status by state or federal agencies, fully protected species, or species protected by the federal Endangered Species Act of 1973 (16 U.S.C. Sec. 1531 et seq.), the California Endangered Species Act (Chapter 1.5 (commencing with Section 2050) of Division 3 of the Fish and Game Code), or the Native Plant Protection Act (Chapter 10 (commencing with Section 1900) of Division 2 of the Fish and Game Code).

(K) Lands under conservation easement.

PRC 21080.66.(b) (1) (A) A local government shall provide formal notification via certified mail and email to each California Native American tribe that is traditionally and culturally affiliated with the project site as an invitation to consult on the proposed project, its location, and the project's potential effects on tribal cultural resources pursuant to one of the following deadlines:

(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.

(ii) For projects whose applications were deemed complete pursuant to paragraph (5) of subdivision (h) of Section 65589.5 of the Government Code before July 1, 2026, within 14 days of notifying the local government that the project is eligible to be exempt from this division pursuant to this section.

(B) The formal notification shall include all of the following:

(i) Detailed project information to help inform the consultation, including site maps, proposed project scope, and any known cultural resource studies.

(ii) Contact information for the local government.

(iii) Contact information for the project proponent.

(iv) Notice that the California Native American tribe has 60 days to request consultation with the local government pursuant to this subdivision.

(2) (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.

(3) (A) Within 14 days of receiving the notification that the California Native American tribe has elected to consult, pursuant to subparagraph (A) of paragraph (2), the local government shall initiate the consultation.

(B) During the consultation, the local government shall act in good faith to identify whether a tribal cultural resource could be affected by the proposed project and shall give deference to the tribal information, tribal knowledge and customs, and the significance of the resource to the California Native American tribe.

(C) The project proponent may participate in the consultation with the approval of the California Native American tribe if the project proponent agrees to engage in good faith and comply with the confidentiality requirements of Sections 7927.000 and 7927.005 of the Government Code, subdivision (d) of Section 21082.3, subdivision (d) of Section 15120 of Title 14 of the California Code of Regulations, and any confidentiality standards adopted by the California Native American tribe participating in the consultation.

(D) The consultation shall seek to find measures that would avoid significant impacts to a tribal cultural resource.

(E) The local government shall document the results of the consultation.

(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.

(4) The local government shall include, as binding conditions of the project approval, all of the following:

(A) Any enforceable agreements reached during the project consultation.

(B) All of the following measures, unless there is mutual agreement between the California Native American tribe and the project proponent not to include the measure as a binding condition:

(i) Upon request by a California Native American tribe, the project shall include tribal monitoring during all ground-disturbing activities, as follows:

(I) The California Native American tribe shall designate the monitor.

(II) The tribal monitor shall comply with applicant's site access and workplace safety requirements.

(III) The applicant shall compensate the tribal monitor at a reasonable rate, determined in good faith, that aligns with customary compensation for cultural resource monitoring, taking into account factors such as the scope and duration of the project.

(ii) Tribal cultural resources shall be avoided where feasible, in accordance with subdivision (a) of Section 21084.3. In furtherance of this requirement, where feasible, the project applicant shall provide deference to tribal preferences regarding access to spiritual, ceremonial, and burial sites, and incorporate tribal traditional knowledge in the protection and sustainable use of tribal cultural resources and landscapes.

(iii) All treatment and documentation of tribal cultural resources shall be conducted in a culturally appropriate manner, consistent with Section 21083.9.

(iv) A California Historical Resources Information System archaeological records search and a tribal cultural records search shall be completed for the project site.

(v) A Sacred Lands Inventory request shall be submitted to the Native American Heritage Commission.

(vi) The project shall comply with Section 7050.5 of the Health and Safety Code and Section 5097.98, including immediate work stoppage upon discovery of human remains or burial grounds, and treatment in accordance with applicable law and in consultation with the affected California Native American tribe.

(vii) An application of tribal ecological knowledge into habitat restoration efforts undertaken by the project as applicable to the specific environmental context and conditions of the project.

(5) For purposes of this subdivision, the following definitions apply:

(A) "California Native American tribe" has the same meaning as defined in Section 21073.

(B) "Enforceable agreement" means an agreement between the local government, project proponent, and any California Native American tribe that has engaged in consultation pursuant to this subdivision regarding the methods, measures, and conditions for tribal cultural resource identification, treatment, and protection, including consideration of avoidance. Compliance with the enforceable agreement shall be a required condition of approval for the project and its terms must be enforceable against the project proponent by the local government and the California Native American tribe.

(C) "Tribal cultural resource" means a site, feature, place, cultural landscape, sacred place, including a Native American sanctified cemetery, Indian cemetery, or Indian burial area, or an object with cultural value to a California Native American tribe that is any of the following:

(i) Included or eligible for inclusion in the California Register of Historical Resources or the National Register of Historic Places.

(ii) Included in a local register of historical resources as defined in subdivision (k) of Section 5020.1.

(iii) Identified by the Native American Heritage Commission as a sacred place pursuant to Section 5097.94 or 5097.96.

(iv) Included in a local tribal register.

PRC 21080.66(c) (1) (A) The local government shall, as a condition of approval for the development, require the development proponent to complete a phase I environmental assessment, as defined in Section 78090 of the Health and Safety Code.

(B) If a recognized environmental condition is found, the development proponent shall complete a preliminary endangerment assessment, as defined in Section 78095 of the Health and Safety Code, prepared by an environmental assessor to determine the existence of any release of a hazardous substance on the site and to determine the potential for exposure of future occupants to significant health hazards from any nearby property or activity.

(C) If a release of a hazardous substance is found to exist on the site, the release shall be removed or any effects of the release shall be mitigated to levels required by current federal and state statutory and regulatory standards before the local government issues a certificate of occupancy.

(D) If a potential for exposure to significant hazards from surrounding properties or activities is found to exist, the effects of the potential exposure shall be mitigated to levels required by current federal and state statutory and regulatory standards before the local government issues a certificate of occupancy.

(2) For any housing on the site located within 500 feet of a freeway, all of the following shall apply:

(A) The building shall have a centralized heating, ventilation, and air-conditioning system.

(B) The outdoor air intakes for the heating, ventilation, and air-conditioning system shall face away from the freeway.

(C) The building shall provide air filtration media for outside and return air that provides a minimum efficiency reporting value of 16.

(D) The air filtration media shall be replaced at the manufacturer's designated interval.

(E) The building shall not have any balconies facing the freeway.

PRC 21080.66(d) (1) Notwithstanding any other law, all construction workers employed in the execution of a housing development project exempt from this division pursuant to this section where 100 percent of the units within the development project are dedicated to lower income households, as defined by Section 50079.5 of the Health and Safety Code, shall be paid at least the general prevailing rate of per diem wages for the type of work and geographic area, as determined by the Director of Industrial Relations pursuant to Sections 1773 and 1773.9 of the Labor Code, except that apprentices registered in programs approved by the Chief of the Division of Apprenticeship Standards may be paid at least the applicable apprentice prevailing rate, regardless of whether the housing development project is a public work.

(2) Notwithstanding any other law, the labor standards of paragraph (8) of subdivision (a) of Section 65913.4 of the Government Code shall apply to buildings over 85 feet in height above grade in any housing development project exempt from this division pursuant to this section.

(3) (A) Notwithstanding any other law, the labor standards of Article 4 (commencing with Section 65912.130) of Chapter 4.1 of Division 1 of Title 7 of the Government Code shall apply for projects of 50 units or greater in the City and County of San Francisco that are not covered by paragraph (2), for any construction craft where at least 50 percent of the units in market-rate multifamily housing projects that received their certificate of occupancy between 2022 and 2024, inclusive, were built by workers that were paid not less than the general prevailing rate of per diem wages.

(B) For purposes of this section, "market-rate multifamily housing development project" means a housing development project of greater than 10 units where less than 95 percent of the units are dedicated to lower income households, as defined by Section 50079.5 of the Health and Safety Code.

(C) (i) The eligibility of this subparagraph, by classification, will be determined by the Department of Industrial Relations and published on its internet website by January 1, 2026.

(ii) In making a determination of eligibility pursuant to this subparagraph, the Director of Industrial Relations shall obtain and consider data from the labor organizations and employers or employer associations concerned no later than October 1, 2025.

(iii) To determine the number of market-rate multifamily housing projects that received their certificate of occupancy in a given year, the Department of Industrial Relations shall use the annual progress report data as reported by the jurisdiction pursuant to Section 65400 of the Government Code.

(4) The provisions of Section 218.8 of the Labor Code shall extend to the development proponent in addition to the direct contractor or subcontractor. For purposes of this paragraph, "development proponent" shall mean a developer who submits the housing development project application to a local government that is exempt from this division pursuant to this section.

(5) (A) A joint labor-management cooperation committee established pursuant to the federal Labor Management Cooperation Act of 1978 (29 U.S.C. Sec. 175a) may undertake any of the following on a housing development project that is exempt from this division pursuant to this section:

(i) Bring an action in a court of competent jurisdiction against a contractor or subcontractor at any tier on behalf of construction workers employed by the contractor or subcontractor on a housing development project that is exempt from this division pursuant to this section to enforce Section 226 of the Labor Code. A contractor is not subject to an action pursuant to this subparagraph due to the failure of a subcontractor to comply with Section 226 of the Labor Code.

(ii) Bring an action in a court of competent jurisdiction on behalf of an affected employee against an employer for damages as if Division 4 (commencing with Section 3200) of the Labor Code did not apply, if the employer fails to secure the payment of compensation as

required by Article 1 (commencing with Section 3700) of Chapter 4 of Part 1 of Division 4 of the Labor Code.

(iii) In addition to the remedies set forth in Section 7028.3 of the Business and Professions Code, on proper showing by a joint labor-management cooperation committee of a continuing violation of Chapter 9 (commencing with Section 7000) of Division 3 of the Business and Professions Code by a person who constructs a housing project and does not hold a state contractor's license in any classification, an injunction shall issue by a court specified in Section 7028.3 of the Business and Professions Code at the request of the joint labor-management cooperation committee, prohibiting that violation.

(B) For any action brought pursuant to this paragraph, the court shall award a prevailing joint labor-management committee its reasonable attorney's fees and costs incurred maintaining the action.

(C) An action brought pursuant to this paragraph shall be filed within one year of a local government issuing a certificate of occupancy for the housing development project or for the portion relating to the action.

(D) This paragraph shall apply only to violations that occur on the site of construction of the housing development project.

(e) This section does not affect the eligibility of a housing development project for a density bonus, incentives or concessions, waivers or reductions of development standards, and reduced parking ratios pursuant to Section 65915 of the Government Code.

Gov'n Code 65598.5 (h) The following definitions apply for the purposes of this section:

(1) "Feasible" means capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, and technological factors.

(2) "Housing development project" means a use consisting of any of the following:

(A) **Residential units only**.

(B) **Mixed-use developments** consisting of residential and nonresidential uses that meet any of the following conditions:

(i) At least two-thirds of the new or converted square footage is designated for residential use.

(ii) At least 50 percent of the new or converted square footage is designated for residential use and the project meets both of the following:

(I) The project includes at least 500 net new residential units.

(II) No portion of the project is designated for use as a hotel, motel, bed and breakfast inn, or other transient lodging, except a portion of the project may be designated for use as a residential hotel, as defined in Section 50519 of the Health and Safety Code.

(iii) At least 50 percent of the net new or converted square footage is designated for residential use and the project meets all of the following:

(I) The project includes at least 500 net new residential units.

(II) The project involves the demolition or conversion of at least 100,000 square feet of nonresidential use.

(III) The project demolishes at least 50 percent of the existing nonresidential uses on the site.

(IV) No portion of the project is designated for use as a hotel, motel, bed and breakfast inn, or other transient lodging, except a portion of the project may be designated for use as a residential hotel, as defined in Section 50519 of the Health and Safety Code.

(C) **Transitional housing** or supportive housing.

(D) **Farmworker housing**, as defined in subdivision (h) of Section 50199.7 of the Health and Safety Code.

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PRC 21080.66(e) This section does not affect the eligibility of a housing development project for a density bonus, incentives or concessions, waivers or reductions of development standards, and reduced parking ratios pursuant to Section 65915 of the Government Code.

DUDEK
MAIN OFFICE
605 THIRD STREET
ENCINITAS, CALIFORNIA 92024
T 800.450.1818 F 760.632.0164

TECHNICAL MEMORANDUM

To:	Jonathan Genton, Genton Cockrum Partners
From:	Dudek Fire Protection Planning Team, Austin Ott and Rob Ball
Subject:	Riverwalk at Studio City Due Diligence Assessment
Date:	September 26, 2025
Attachment(s):	Figure 1 – Fire Hazard Severity Zones
	Figure 2 – Fire History
	Attachment 1 – Fire Flow Report
	Attachment 2 – Plant Selection Guidelines

Introduction

Dudek was commissioned by Genton Cockrum Partners to provide a due diligence technical assessment of the Riverwalk at Studio City project (Project). This assessment provides a review of the related fire code requirements for the Project and the Project site, inclusive of fire apparatus access, water supply, and defensible space for wildfire protection. This analysis will confirm compliance with the applicable fire codes and, where such is the case, identify any non-complying aspects of the Project and provide recommendations for addressing or correcting the Project element of concern.

The Project proposes to repurpose 6.01 acres on the northwest corner of Ventura Blvd. and Whitsett Avenue bounded by Ventura Blvd. to the southwest, Whitsett Avenue to the east, Valleyheart Drive to the northeast, and the San Fernando Valley Condos to the northwest. The Project site is currently developed with four commercial and retail buildings. The Project proposes a mixed-use development consisting of 814 residential apartment units and 75,968 square feet of commercial space. Buildings proposed for the Project include two-story restaurants and seven-story residential buildings constructed over subterranean parking. Overall building height to the roof of the residential buildings, measured in accordance with the adopted fire code, is approximately 71 feet above grade with the highest occupiable floor approximately 60 feet above grade. The Project site includes plazas, courtyards, pool and deck areas, and pedestrian access to the Los Angeles River. The construction types for the Project are Type 3 for the residential units over Type 1 for the garages.[1]

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). *Figure 1 – Fire Hazard Severity Zones* shows the Project site relative to the designated fire hazard severity zones. The Santa Monica Mountains to the south of the Project site are the primary wildfire hazard area. As shown in *Figure 2 – Fire History*, the Santa Monica

[1] Riverwalk at Studio City. Project plan set.

Mountains have an extensive wildfire history, however none of the recorded fires have burned onto the Project site, and the most recent fire near the Project site was in 1963, likely prior to development of the area. A CAL FIRE designation as a fire hazard severity zone does not indicate that an area is not safe for development. Rather, a fire hazard severity zone designation indicates that specific fire protection features that minimize structure vulnerability to a wildfire event will be required. The Los Angeles Fire Department (LAFD) is the fire authority having jurisdiction for the Project site.

1 Regulatory Analysis

The development of the Project is regulated by adopted legislation, codes, and standards. The regulatory environment has been shaped by post-fire analysis and controlled laboratory research. The applicable codes are discussed in this section. The Project is also affected by Assembly Bill 130, the recent state budget trailer bill that provides a new statutory exemption from the California Environmental Quality Act (CEQA) for certain urban infill housing development projects.

1.1 Los Angeles Building Code

The City has adopted the 2023 Los Angeles Building Code, which is a combination of the 2022 California Building Code with City of Los Angeles amendments. Chapter 7A of the Building Code contains the materials and construction methods for exterior wildfire exposure. The purpose of Chapter 7A is to establish minimum standards for the protection of life and property by increasing the ability of a building located in any fire hazard severity zone to resist the intrusion of flames or burning embers projected by a vegetation fire and to contribute to a systematic reduction in conflagration losses. The construction requirements in Chapter 7A are applicable to the Project due to its location in a designated LRA VHFHSZ.

1.2 Los Angeles Fire Code

The City of Los Angeles has also adopted the 2023 Los Angeles Fire Code, which is a combination of the 2022 California Fire Code with City of Los Angeles amendments. Chapter 5 of the Fire Code contains the basic provisions for fire apparatus access and water supply. Chapter 49 of the Fire Code contains the fire safety requirements for wildland-urban interface fire areas and fire hazard severity zones, which include requirements for fire protection plans and vegetation fuel modification and management. Appendix D of the Fire Code contains more specific requirements for fire apparatus access than Chapter 5 of the Fire Code. The appendix is not part of the Fire Code unless it is specifically adopted by the local fire agency. LAFD has adopted Appendix D with amendments.

1.3 Government Code 51182

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.

1.4 Public Resources Code 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.

1.5 Public Resources Code 4291

Public Resources Code Section 4291 (PC 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.

1.6 Assembly Bill 130

Assembly Bill 130 (AB 130) is one of two trailer bills that were attached to the recent state budget adoption that revised the California Environmental Quality Act (CEQA) to add statutory exemptions for certain types of projects, including housing projects. Specifically, AB 130 includes Public Resources Code section 21080.66, which establishes a new statutory exemption for qualifying housing development projects that are 20 acres or less in size and meet other specific criteria.

One of the new CEQA statutory exemptions allowed by AB 130 is an infill exemption. This provision exempts urban infill projects of up to 20 acres, which have a substantial housing component to the project, from CEQA review if the project meets several criteria. The legislation updated Government Code Section 65913.4, which excludes projects from this exemption if the project is located in within a LRA VHFHSZ, as determined by CAL FIRE pursuant to Government Code Section 51178, or within the SRA, as defined in Public Resources Code Section 4102.

However, projects in a designated SRA or LRA VHFHSZ do qualify for the CEQA exemption if the project has adopted fire hazard mitigation measures pursuant to existing building standards or state fire mitigation measures applicable to the development, including, but not limited to, standards established under all of the following:

- Public Resources Code Section 4291 or Government Code Section 51182.
- Public Resources Code Section 4290.
- California Building Code Chapter 7A.

1.7 Regulatory Compliance

Los Angeles Municipal Code Chapter 5, Article 7, Section 57 formally adopts amended versions of the California Building and Fire Codes and includes the provisions of PRC 4290 and 4291 along with the provisions of GC 51182.

The Project will be in compliance with the applicable provisions of Chapter 7A of the California Building Code, Chapter 49 of the California Fire Code, Sections 4290 and 4291 of the Public Resources Code, and Section 51182 of the Government Code. The Project qualifies for the infill housing project exemption from CEQA established by AB 130 and codified in Section 65913 of the Government Code.

2 Fire Access

Section 503 and Appendix D of the Fire Code contain the provisions that pertain to fire apparatus access. These provisions include the design specifications for fire apparatus access roads, additional requirements for aerial fire apparatus access, and the requirements for the locations of fire apparatus access roads relative to buildings.

2.1 Fire Apparatus Access Roads

The Fire Code requires fire apparatus access roads to be a minimum of 20 feet in width.[2] The fire apparatus access roads, also known as fire lanes, for this Project consist of Ventura Blvd., Whitsett Avenue, Valleyheart Drive, an on-site fire lane along the northwest boundary of the Project adjacent to Building 4, and an on-site fire lane approximately in the center of the Project between Building 2 and Building 3 that connects with both Ventura Blvd. and Valleyheart Drive. **All the designated fire apparatus access roads meet the minimum width requirement of 20 feet.**

Where parallel parking is allowed on either side of a fire lane, the width of the fire lane is required to be increased by 8 feet for each parking lane.[3] Ventura Blvd., Whitsett Avenue, and Valleyheart Drive meet this requirement. Ventura Blvd. is 70 feet wide with parking allowed on both sides of the street, Whitsett Avenue is 64 feet wide with parking prohibited adjacent to the Project site, and Valleyheart Drive is 28 feet wide with parking limited to the east side of the street only. Parking is not proposed for either side of the on-site fire lanes. **All fire apparatus access roads meet the minimum width requirement when parking is allowed.**

Fire apparatus access roads are also required to have a clear vertical height of not less than 13 feet 6 inches.[4] All the fire apparatus access roads can achieve this required vertical clearance. Landscaping plans show proposed trees adjacent to the on-site fire lanes. The landscape architect is encouraged to coordinate with the fire department on the species and exact installation location of the trees to minimize encroachment of the tree canopies into the vertical clearance of the fire lanes. **Regular maintenance of the trees will be required to prevent tree canopy growth into the width and height specifications of the fire lanes.**

Fire apparatus access roads are required to have a surface that allows all-weather drivability.[5] Appendix D states that surfaces of fire lanes are to be asphalt, concrete, or other approved driving surface capable of supporting the

[2] Los Angeles Fire Code Section 503.
[3] Los Angeles Fire Code Section 503.
[4] Ibid
[5] Ibid

imposed load of fire apparatus weighing up to 75,000 pounds.[6] The two on-site fire lanes are proposed to have a surface of turf block and artificial turf. Some fire departments consider turf block to be an alternative surface. **Specific approval from LAFD will be needed to use turf block with artificial turf as the surface for the on-site fire lanes.**

Dead-end fire apparatus access roads in excess of 150 feet in length are required to be provided with an approved turnaround.[7] Valleyheart Drive is currently identified as a dead-end road. However, the Project proposes to connect Valleyheart Drive with the two on-site fire lanes. Connecting Valleyheart Drive with the northwest fire lane creates through access for emergency vehicles. **None of the fire apparatus access roads are dead-end roads.**

2.2 Aerial Fire Apparatus Access

Where the vertical distance between the grade plane and the highest roof surface exceeds 30 feet, the Fire Code requires an approved aerial fire apparatus access road to be provided. As previously noted, the roofs of the residential buildings are approximately 71 feet above the grade plane. As such, the Project is required to provide conforming aerial fire apparatus access. An aerial fire apparatus access road is required to be a minimum of 28 feet in width.[8] Additionally, the aerial fire apparatus access road is required to have the edge nearest to the building located 15-30 feet from the building in order to allow for articulation of the aerial ladder and deployment with safe climbing angles.[9] Ventura Blvd. can serve as the required aerial fire apparatus access road. All buildings are set back approximately 21 feet from Ventura Blvd., which in within the 15-30-foot setback range required for an aerial fire apparatus access road. The 70-foot width of Ventura Blvd. exceeds the minimum 28-foot width requirement for an aerial fire apparatus access road. **Ventura Blvd. meets the requirements of an aerial fire apparatus access road for all of the buildings proposed by the Project.**

2.3 Proximity to Buildings

Approved fire apparatus access roads are required to be provided for every building. One or more fire apparatus access roads are required to extend to within 150 feet of all portions of the facility and all portions of the exterior walls of the first story of the building as measured by an approved route around the exterior of the building.[10] This is known as the hose pull requirement. Access to within 150 feet of all portions of the exterior walls of the first story ensures that firefighters are able to extend pre-connected hose lines completely around buildings. There is an exception that allows the fire code official to increase the maximum allowable distance when a structure is equipped with Fire Sprinklers, such as the Project.

A hose pull analysis was completed for this assessment. All portions of the exterior walls of the first story of all the proposed buildings are within 150 feet of a fire apparatus access road except for two small portions. There is a 17-foot gap in the courtyard of Building 2 and a 28-foot gap in the courtyard of Building 4. **It is anticipated that these hose pull gaps will be acceptable to LAFD given the various systems that will be included in this Project, specifically automatic fire sprinklers and standpipes, which allow the fire code official to grant the aforementioned determination.**

[6] Los Angeles Fire Code Appendix D
[7] Los Angeles Fire Code Section 503
[8] Ibid
[9] Los Angeles Fire Code Appendix D
[10] Los Angeles Fire Code Section 503

3 Water Supply

Fire protection water supplies are required to be provided through a system of water sources, water mains, and fire hydrants that are capable of providing the required fire flow. Fire flow is typically based on the type of construction and the size of the building requiring fire protection. The Los Angeles Fire Code has water supply requirements based on the type of land development.

3.1 Fire Flow

The Project, while primarily residential, is located in an industrial and commercial land use zone**.** The City of Los Angeles Fire Code requires a fire flow of 6,000 to 9,000 gallons per minute (gpm) for industrial and commercial land use zones.[11] An *Information of Fire Flow Availability* report provided by the Los Angeles Department of Water and Power for the Project indicates that the water supply system can provide a total of 9,000 gpm at the Project site (*Attachment 1*). **Attachment 1 confirms that the required fire flow for the Project will be met by the Los Angeles Department of Water and Power.**

3.2 Fire Hydrants

In addition to providing 9,000 gallons of water per minute, the LAFD also requires the fire flow to be provided by a minimum of six project-adjacent fire hydrants all flowing water simultaneously.[12] The *Information of Fire Flow Availability* report identifies six existing fire hydrants on Ventura Blvd. between Whitsett Avenue and the northwest on-site fire lane adjacent to and across the street from the Project site. The fire flow report confirms that each fire hydrant can flow 1,500 gpm for a total of 9,000 gpm when all fire hydrants are flowing simultaneously. **The required number of fire hydrants currently exists within the proximity to the Project required by the LAFD.**

4 Defensible Space and Vegetation Management

As previously mentioned, the Project is located in a designated Very High Fire Hazard Severity Zone (VHFHSZ). As such, the Project is required to provide defensible space vegetation management that complies with LAFD requirements. For projects in urban areas surrounded by existing development, vegetative fuel management is generally accomplished through a landscaping plan that complies with defensible space fuel management zone (FMZ) requirements.

4.1 Fuel Management Zones

The LAFD requires 200 feet of managed vegetative fuel for projects located in a fire hazard severity zone. The distance is measured from the edges of buildings outward and is divided into two fuel management zones, each of which is 100 feet in width. The first 100 feet of vegetation fuel management is further divided into three zones. An ember-resistant zone is the first five feet adjacent to a structure. Zone A extends 5 to 30 feet from the structure and Zone B extends 30 to 100 feet from the structure.

[11] Los Angeles Fire Code Section 507
[12] Ibid

The Project is infill and does not have any direct interface with wildland vegetative fuels. The nearest wildland area is approximately 1,500 feet from the Project adjacent to the low-density residential development to the south. As such, the 200 feet of vegetative fuel management for this Project is provided by adjacent land uses including urban development, residential development, and the Los Angeles River to the northeast of the Project site. The remaining consideration with regard to vegetative fuels is the landscaping for the Project.[13] Given the distance the Project is located from the Santa Monica Mountains and the natural vegetation in which wildfires typically occur, the Project site is not at risk of being affected by the flames of a wildfire. However, embers produced by a wildfire event could be carried by prevailing on-shore winds or seasonal off-shore winds to the Project site. Embers are the primary ignition source of wildfire-related ignitions in landscaping vegetation.[14]

4.2 Ground-Level Landscaping

In fire hazard severity zones, the LAFD requires "landscape vegetation, including, but not limited to conifers (e.g. cedar, cypress, fir, juniper, and pine), eucalyptus, acacia, palm, and pampas grass [to be maintained] in such a condition as not to provide an available fuel supply to augment the spread or intensity of a fire."[15] In general, Chapter 49 of the Fire Code requires all new vegetation installed in a fire hazard severity zone to be fire-resistant.[16] The Fire Code provides several means of determining if plants, shrubs, and trees are classified as fire-resistant. The means include a book, journal, or listing, approved by the fire agency, that provides fire-resistance information about the species recommended for a climate zone; a report or finding, with justification, issued by a licensed landscape architect; or vegetation approved by and/or considered to be fire-resistant by the local fire agency.[17] Attachment 2 of this assessment contains the *Los Angeles City and County Plant Selection Guidelines by Zone* document. This information is provided to assist with determining which of the proposed plants, shrubs, and trees in the conceptual landscaping plans will be acceptable for landscaping in a fire hazard severity zone.

4.3 Rooftop Landscaping

In addition to ground-level landscaping, the Project proposes landscaping for the occupiable rooftops. The Fire Code does not specifically prohibit rooftop landscaping in fire hazard severity zones. Landscaping vegetation for rooftops is required to comply with defensible space vegetative fuel management provisions since the landscaping is within the designated fuel management zone for the building. As with ground-level landscaping, rooftop landscaping is required to be selected and maintained such that the landscaping does not provide an available fuel supply to augment the spread or intensity of a fire.

More specifically, the Fire Code limits rooftop landscaped areas to a maximum of 15,625 square feet with the longest side of the area not exceeding 125 feet. Multiple rooftop landscaped areas are required to be separated by at least 6 linear feet.[18] Rooftop landscaping is required to be provided with supplemental irrigation to ensure that plants remain hydrated sufficiently to remain healthy and minimize dry foliage. In keeping with the state's

[13] Los Angeles Fire Code Section 322
[14] National Fire Protection Association. 2025. *How Do Homes Burn in a Wildfire?* https://www.nfpa.org/videos/how-do-homes-burn-in-a-wildfire
[15] Los Angeles Fire Code Section 4906
[16] Ibid
[17] Ibid
[18] Los Angeles Fire Code. Section 317

requirement for an ember-resistant zone around structures, it is recommended that rooftop landscaping is not located within 5 feet of walls that extend above the occupiable and landscaped rooftop area.

4.4 Trees

Trees receive special consideration as part of the landscaping for projects in fire hazard severity zones. Trees are desirable in the urban environment to help reduce the heat island effect of development, to provide shade to help reduce the use of energy to cool buildings, and to improve quality of life.[19] In general, new fire-resistant trees installed in fire hazard severity zones are required to be planted such that the tree's drip line or canopy perimeter at maturity is at least 10 feet from buildings.

Trees that are not fire-resistant, such as conifers, palms, pepper trees, and eucalyptus species are required to be installed such that their drip lines or canopy perimeters at maturity are 30 feet from buildings. Given the siting and massing of the proposed buildings for this Project, there are very limited locations within the Project site that would accommodate non-fire-resistive trees whose drip lines will be 30 feet from the buildings at maturity. The LAFD gives special attention to palm trees given their known ignitability from airborne embers and their propensity for large volume and large size ember production once ignited. LAFD notes,

> Many palm species are known to be receptive to embers and once ignited, difficult to extinguish. Poorly maintained palms present an even greater hazard in the amount of ember production as well as the size and distance they can travel during wind driven wildfires. Size of the embers can vary from small masses of fibers to entire fronds. What we have learned about the dangers of embers and the distance they can travel suggests we should avoid using palms in known fire hazard severity zones.[20]

The existing landscaping on the Project site includes numerous palm species. The Project proposes to retain many Mexican Fan Palm trees. According to the *Los Angeles City and County Plant Selection Guidelines by Zone* document, Mexican Fan Palm trees are not allowed in Fuel Modification Zone A, which is the zone that is 5 to 30 feet from a structure. With regard to palm trees, the LAFD offers the following guidance:

> There are hundreds of palm species in cultivation, however, it is impractical to identify each one and their appropriate planting location. Fuel Modification Plan Checkers will evaluate each plan according to the Plant Selection Guidelines [Attachment 1] considering density and arrangement first, then species selection and location in relation to the structure second.[21]

4.5 Vegetation Management Summary

The landscaping plans prepared for the Project include a selection of trees and shrubs that are on the approved plant list that is included in the *Los Angeles City and County Plant Selection Guidelines by Zone* document. Trees selected can be located with regard to the buildings such that they meet the spacing and distance requirements for Zone A fuel modification. Shrubs selected provide a variety of options to comply with requirements for location, height, groupings, and spacing. Review of the landscaping plans by LAFD will provide the necessary guidance for

[19] California ReLeaf. 2025. *Benefits of Urban Trees*. https://californiareleaf.org/resources/benefits-of-trees/
[20] LAFD. 2025. *Palms, Wildfires, and AB 3074*. https://lafd.org/palms-and-wildfires-and-ab3074
[21] LAFD. 2025. *Palms, Wildfires, and AB 3074*. https://lafd.org/palms-and-wildfires-and-ab3074

retention of existing trees; species and placement of new trees; and species, spacing, and grouping of shrubs. The Project is required to comply with LAFD's requirements through the plan review process.

5 Plans

Like many southern California fire agencies, LAFD will generally require a fire protection plan for projects located in a fire hazard severity zone per section 4903 of the LAFC. Fire protection plans are project-specific, comprehensive documents that review and analyze relevant fire protection and safety codes, regulations, and standards with the intent to describe and prescribe ways to minimize and mitigate potential for loss from a wildfire exposure. Fire protection plans generally include vegetative fuel modification plans and/or detailed landscaping plans. If desired, Dudek can prepare a comprehensive fire protection plan for the Project that thoroughly evaluates all wildfire related factors, including the emergency response capacities of nearby fire stations, along with the Project's compliance with all applicable codes, regulations, and standards.

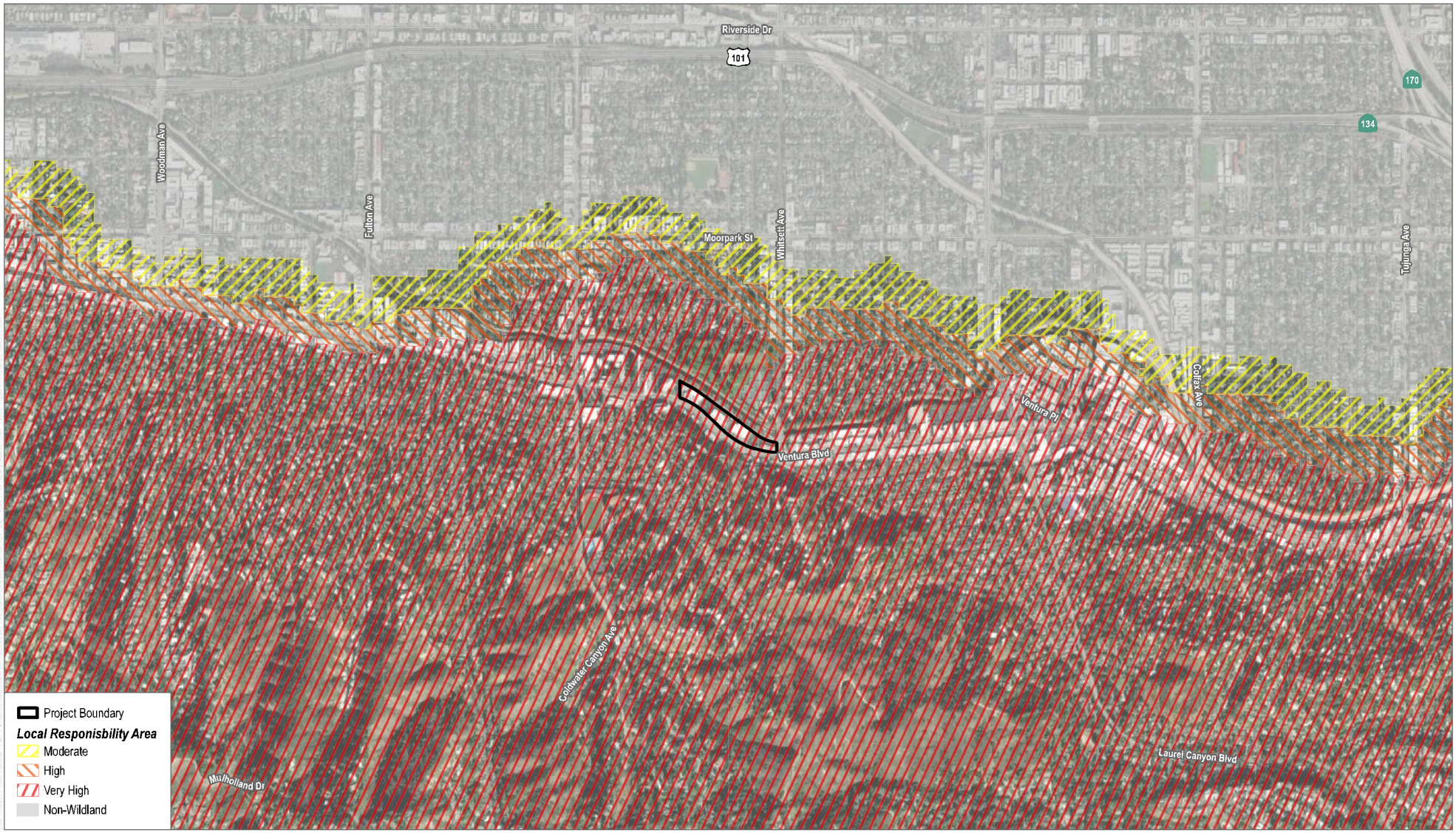
Conclusion

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. Approval of LAFD is needed to accept two small hose pull gaps and the surfacing of two on-site fire lanes with turf block and artificial turf. It is expected that the minor hose pull deficiencies will be approved.

The 200 feet of defensible space required by the fact that the Project is in a designated fire hazard severity zone is provided by the existing adjacent urban development and the Los Angeles River. 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. An analysis of the proposed landscaping is included with this report. 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.

LAFD may require the submittal of a comprehensive fire protection plan for the Project. Should a fire protection plan be required, Dudek staff can complete a complying report.



SOURCE: Esri World Imagery; CalFire 2025

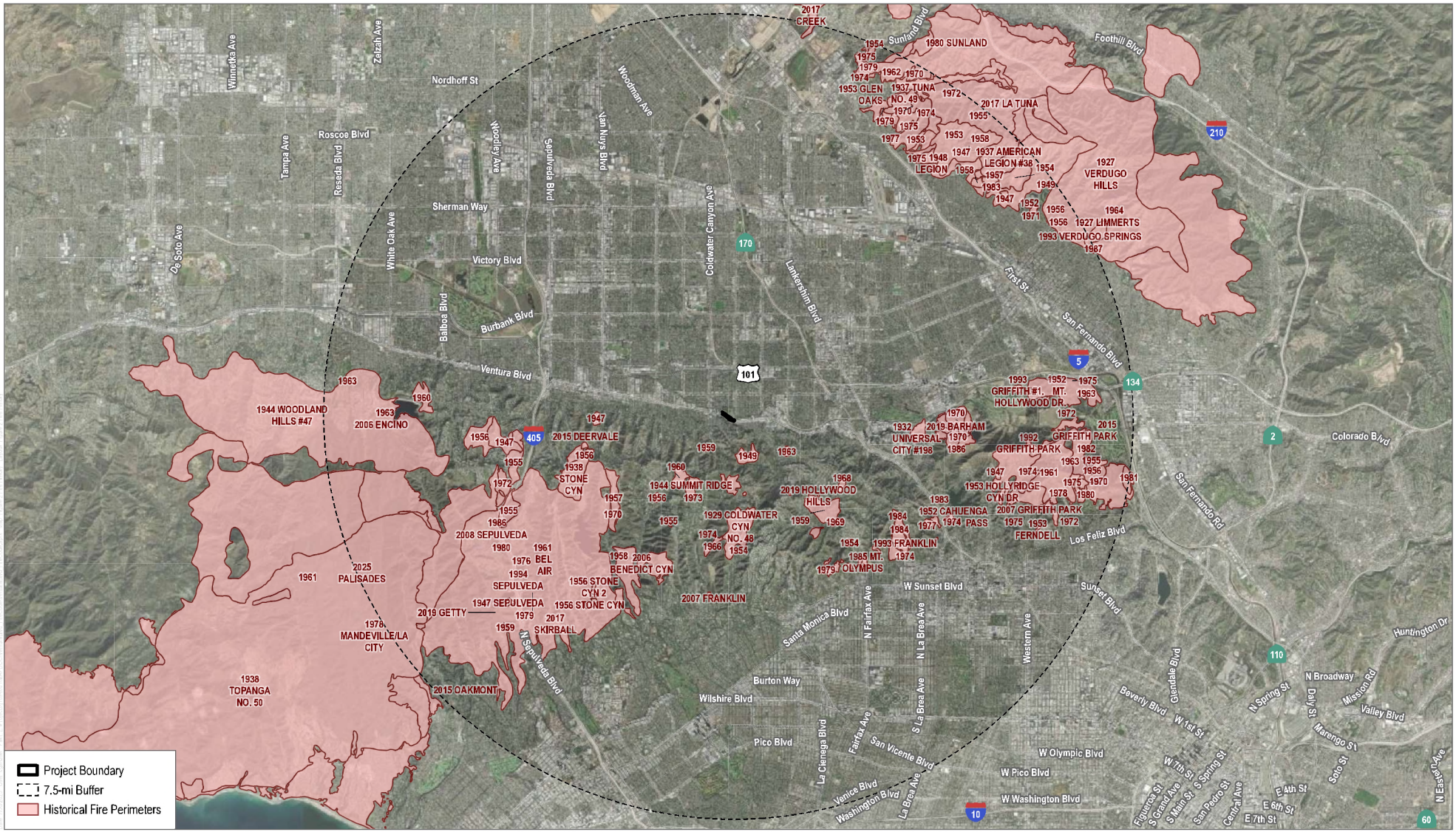
DUDEK

0 500 1,000 Feet

FIGURE 1

Fire Hazard Severity Zones

Riverwalk at Studio City



SOURCE: Esri World Imagery; Open Street Maps 2019; CalFire 2025

DUDEK

0 4,000 8,000 Feet

FIGURE 2

Fire History

Riverwalk at Studio City

City of Los Angeles
Los Angeles Department of Water and Power - Water System

INFORMATION OF FIRE FLOW AVAILABILITY

M

LAFD Fire Flow Requirement: dr

Water Service Map No.: 164-165\164-162

LAFD Signature:

Date Signed:

Applicant: Ismael Pablo

Company Name: Psomas

Address: 865 South Figueroa St Los Angeles,CA 90017

Telephone: (213)-223-1496

Email Address: ismael.pablo@psomas.com

	F- 73713	F- 66720	F- 63981
Location:	Located in the Northwest corner of Ventura Blvd. and Whitsett Ave.	Located on the North side of Ventura Blvd., 500' West of Whittset Ave. CL	Located on the North side of Ventura Blvd., 900' West of Whittset Ave. CL
Distance from Neareast Pipe Location (feet):	24.5 ft	21.5 ft	21.5 ft
Hydrant Size:	2 1/2 X 4D	2 1/2 X 4D	2 1/2 X 4D
Water Main Size (in):	12 in	12 in	12 in
Static Pressure (psi):	138 psi	140 psi	139 psi
Residual Pressure (psi):	118 psi	118 psi	117 psi
Flow at 20 psi (gpm):	1500 gpm	1500 gpm	1500 gpm

NOTE: Data obtained from hydraulic analysis using peak hour.

W20250326021

Remarks: 6

ECMR No.

Run a scenario for ~~4~~ hydrants flowing simultaneously at 9,000 gpm.

Water Purveyor: **Los Angeles Department of Water & Power** *Date:* 4/29/2025

Signtature: *Title:* Civil Engineering Associate II

d d

"Los Angeles Department of Water and Power", and mailed to:
Los Angeles Department of Water and Power
Distribution Engineering Section - Water
Attn: Business Arrangements
111 North Hoe Street - Room 1425
Los Angeles, CA 90012

*** If you have any questions, please contact us at (213) 367-2WNB or visit our web site at http://www.ladwp.com.**

City of Los Angeles
Los Angeles Department of Water and Power - Water System

INFORMATION OF FIRE FLOW AVAILABILITY

LAFD Fire Flow Requirement: M dr

Water Service Map No.: 164-165\164-162

LAFD Signature:

Date Signed:

Applicant: Ismael Pablo

Company Name: Psomas

Address: 865 South Figueroa St Los Angeles,CA 90017

Telephone: (213)-223-1496

Email Address: ismael.pablo@psomas.com

	F- 73711	F- 75959	F- 50644
Location:	Located on the North side of Ventura Blvd., 1444' West of Whittset Ave. CL	Located on the South side of Ventura Blvd., 830' West of Whittset Ave. CL	Located on the South side of Ventura Blvd., 1125' West of Whittset Ave. CL
Distance from Neareast Pipe Location (feet):	22 ft	22 ft	22 ft
Hydrant Size:	2 1/2 X 4D	2 1/2 X 4D	2 1/2 X 4D
Water Main Size (in):	12 in	12 in	12 in
Static Pressure (psi):	138 psi	140 psi	139 psi
Residual Pressure (psi):	118 psi	116 psi	117 psi
Flow at 20 psi (gpm):	1500 gpm	1500 gpm	1500 gpm

NOTE: Data obtained from hydraulic analysis using peak hour.

Remarks: Run a scenario for ~~4~~ 6 hydrants flowing simultaneously at 9,000 gpm.

ECMR No. W20250326021

Water Purveyor: **Los Angeles Department of Water & Power** *Date:* 4/29/2025

Signtature: *Title:* Civil Engineering Associate II

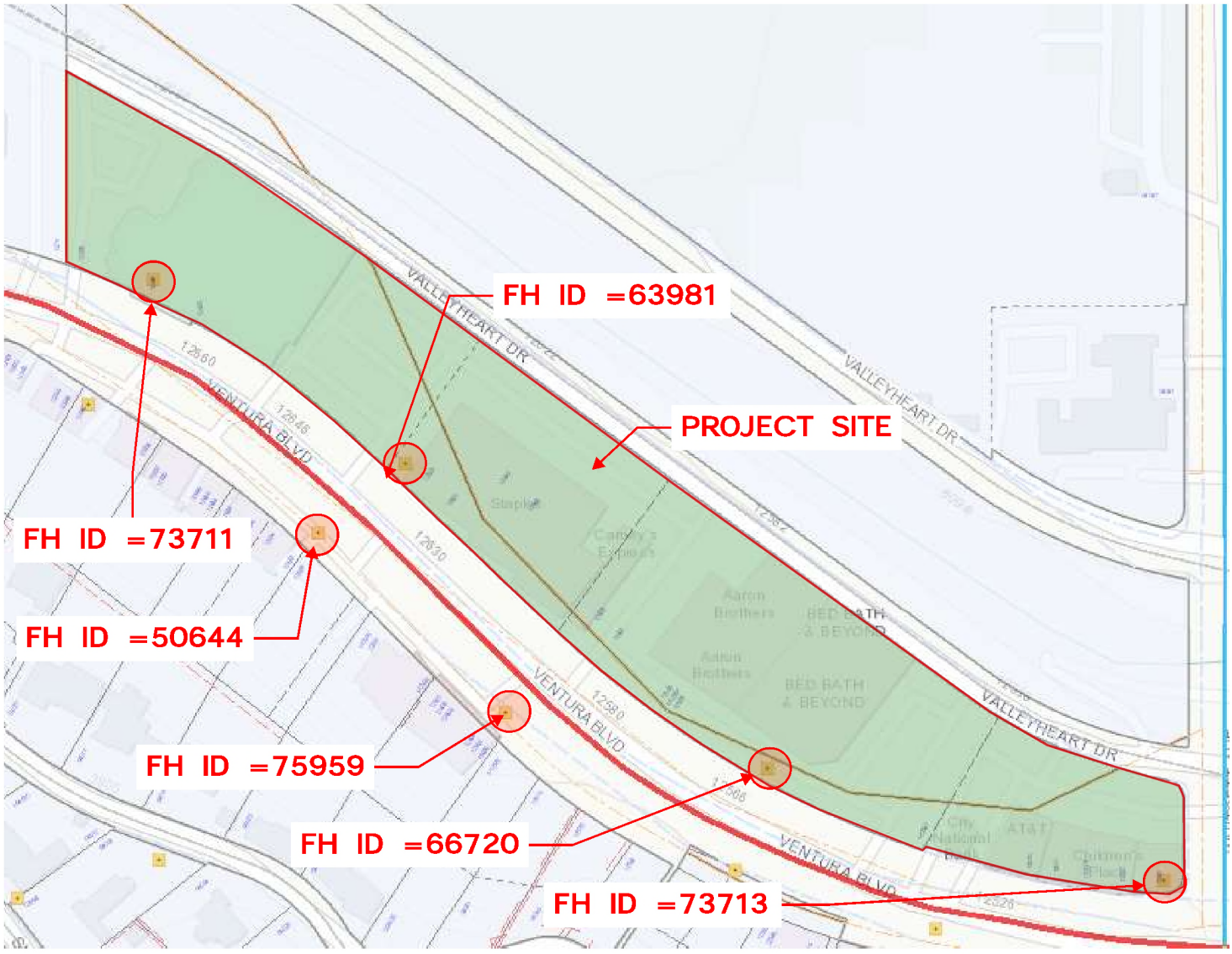
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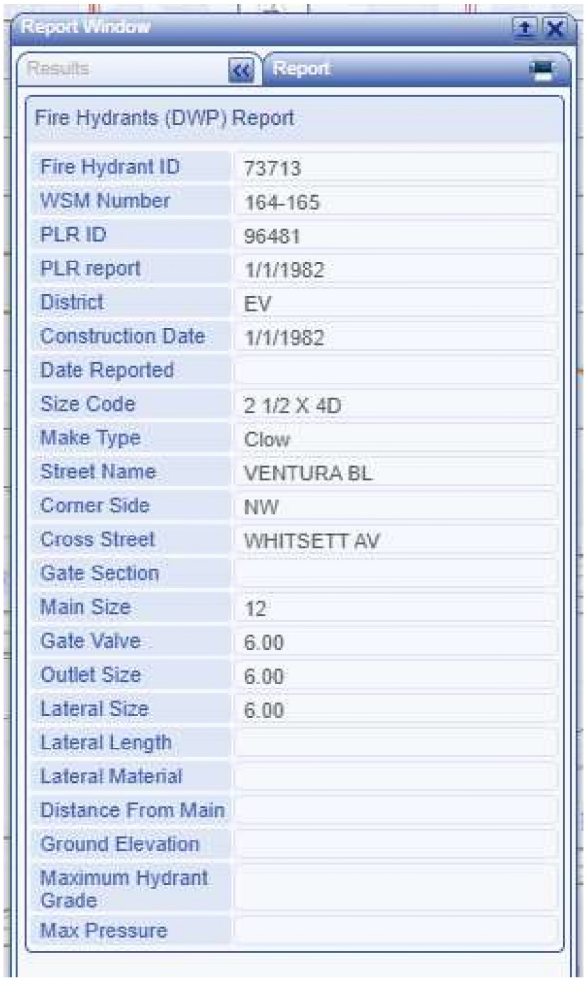
"Los Angeles Department of Water and Power", and mailed to:
Los Angeles Department of Water and Power
Distribution Engineering Section - Water
Attn: Business Arrangements
111 North Hoe Street - Room 1425
Los Angeles, CA 90012

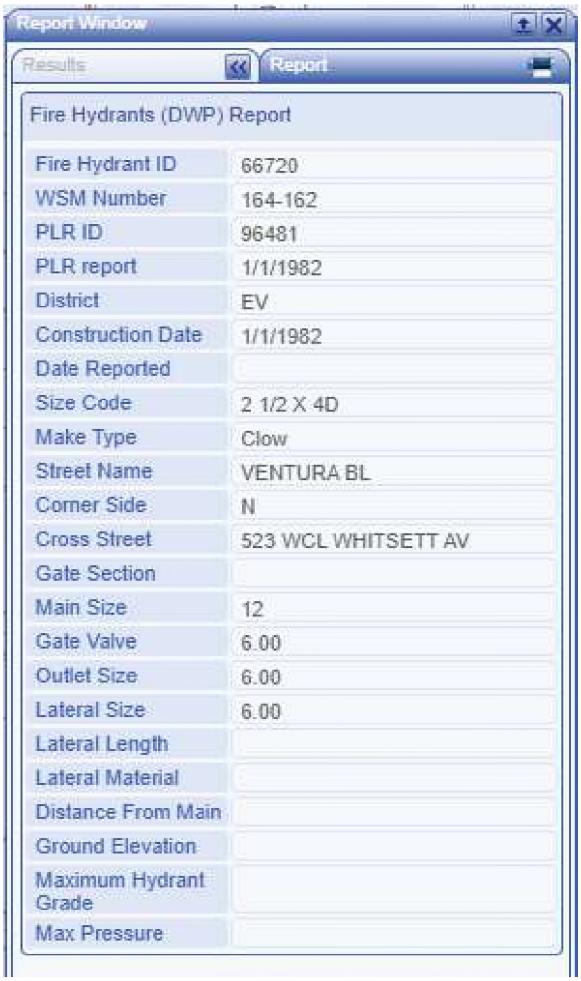
*** If you have any questions, please contact us at (213) 367-2WNB or visit our web site at http://www.ladwp.com.**

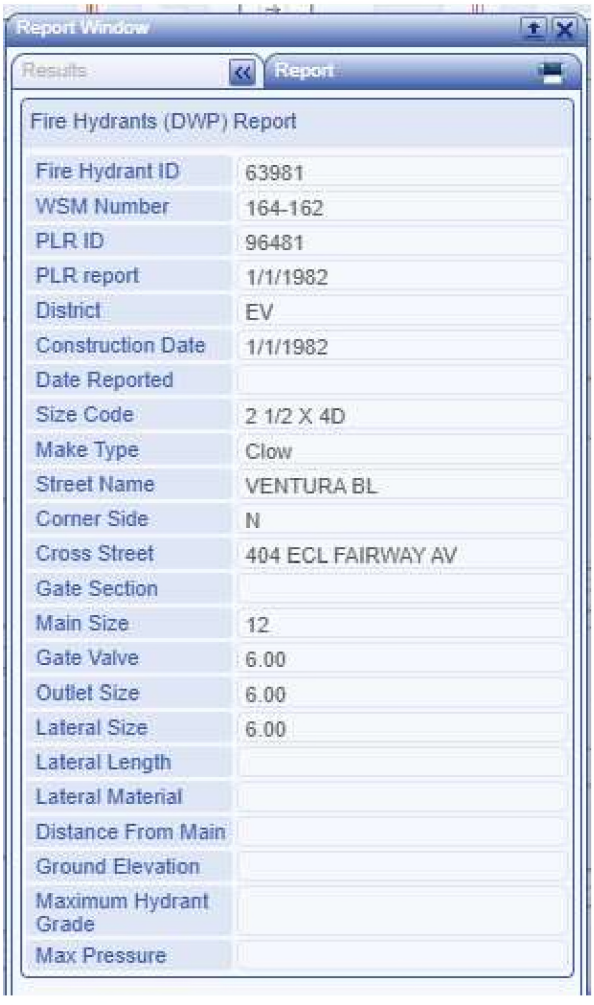
TABLE 57.507.3.1
FIRE-FLOW BY TYPE OF LAND DEVELOPMENT

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).




Report Window
Results
Report
Fire Hydrants (DWP) Report
Fire Hydrant ID 73713
WSM Number 164-165
PLR ID 96481
PLR report 1/1/1982
District EV
Construction Date 1/1/1982
Date Reported
Size Code 2 1/2 X 4D
Make Type Clow
Street Name VENTURA BL
Corner Side NW
Cross Street WHITSETT AV
Gate Section
Main Size 12
Gate Valve 6.00
Outlet Size 6.00
Lateral Size 6.00
Lateral Length
Lateral Material
Distance From Main
Ground Elevation
Maximum Hydrant Grade
Max Pressure


Report Window
Results
Report
Fire Hydrants (DWP) Report
Fire Hydrant ID 66720
WSM Number 164-162
PLR ID 96481
PLR report 1/1/1982
District EV
Construction Date 1/1/1982
Date Reported
Size Code 2 1/2 X 4D
Make Type Clow
Street Name VENTURA BL
Corner Side N
Cross Street 523 WCL WHITSETT AV
Gate Section
Main Size 12
Gate Valve 6.00
Outlet Size 6.00
Lateral Size 6.00
Lateral Length
Lateral Material
Distance From Main
Ground Elevation
Maximum Hydrant Grade
Max Pressure


Report Window
Results
Report
Fire Hydrants (DWP) Report
Fire Hydrant ID 63981
WSM Number 164-162
PLR ID 96481
PLR report 1/1/1982
District EV
Construction Date 1/1/1982
Date Reported
Size Code 2 1/2 X 4D
Make Type Clow
Street Name VENTURA BL
Corner Side N
Cross Street 404 ECL FAIRWAY AV
Gate Section
Main Size 12
Gate Valve 6.00
Outlet Size 6.00
Lateral Size 6.00
Lateral Length
Lateral Material
Distance From Main
Ground Elevation
Maximum Hydrant Grade
Max Pressure


Report Window
Results
Report
Fire Hydrants (DWP) Report
Fire Hydrant ID 73711
WSM Number 164-162
PLR ID 96481
PLR report 1/1/1982
District EV
Construction Date 1/1/1982
Date Reported
Size Code 2 1/2 X 4D
Make Type Clow
Street Name VENTURA BL
Corner Side N
Cross Street 91 ECL FAIRWAY AV
Gate Section
Main Size 12
Gate Valve 6.00
Outlet Size 6.00
Lateral Size 6.00
Lateral Length
Lateral Material
Distance From Main
Ground Elevation
Maximum Hydrant Grade
Max Pressure


Report Window
Results
Report
Fire Hydrants (DWP) Report
Fire Hydrant ID 75959
WSM Number 164-162
PLR ID 102598
PLR report 11/9/1995
District EV
Construction Date 11/9/1995
Date Reported
Size Code 2 1/2 X 4D
Make Type Clow
Street Name VENTURA BLVD
Corner Side S
Cross Street 655'ECL FAIRWAY AVE
Gate Section 165-162
Main Size 12
Gate Valve 6.00
Outlet Size 6.00
Lateral Size 6.00
Lateral Length
Lateral Material
Distance From Main
Ground Elevation
Maximum Hydrant Grade
Max Pressure


Report Window
Results
Report
Fire Hydrants (DWP) Report
Fire Hydrant ID 50644
WSM Number 164-162
PLR ID 102598
PLR report 11/9/1995
District EV
Construction Date 11/9/1995
Date Reported
Size Code 2 1/2 X 4D
Make Type Clow
Street Name VENTURA BLVD
Corner Side S
Cross Street 357'ECL FAIRWAY AVE
Gate Section 165-162
Main Size 12
Gate Valve 6.00
Outlet Size 6.00
Lateral Size 6.00
Lateral Length
Lateral Material
Distance From Main
Ground Elevation
Maximum Hydrant Grade
Max Pressure

Plant Selection Guidelines by Zone

Fuel Modification plant selection and location should focus on the density and arrangement of plants related to structures. Second, choose zone appropriate species based on plant characteristics such as moisture content, resin/pitch and the production of dead litter from leaves, bark, seed pods etc. The following guidelines are intended to simplify this process through zone specific compositions.

Zone A (30' from any qualifying structure or the property line whichever is first)

- Zone A should be planted "lean" and selections should consist of small herbaceous or succulent plants less than 2'-3' in height or regularly irrigated and mowed lawns.
- It is best not to use woody trees, shrubs and perennial species or masses of un-mowed grasses within 10 feet of the structure.
- Occasional accents of woody plants can be used sparingly to soften hard edges of structures if the selections are widely spaced and zone appropriate.
- Consider locating hardscape features such as walkways, patios, driveways, sport courts etc. adjacent to the structure itself. Potted plants can be used to soften walls if necessary.

Zone B (30'-100' from any qualifying structure)

- Zone B can be planted with a slightly higher density than Zone A. However, care should be taken not to create horizontal or vertical fuel ladders (see basic fire behavior graphics).
- Screen plantings can be used to hide unsightly views. Hedging is discouraged as it promotes the accumulation of dead litter inside the live hedge.
- Zone B is the ideal location to introduce larger shade trees provided they are zone appropriate and the canopies are not continuous.
- Avoid planting woody plant species larger than 3' at maturity directly beneath any tree canopy.

Zone C (100'-200' from any qualifying structure)

- Zone C often is not landscaped on many projects but is still subject to hazard reduction requirements (brush clearance). Do not denude the property. http://www.readyforwildfire.org/
- If Zone C is to be landscaped, avoid increasing plant density beyond guidelines for Zone B.

Adjacent to Access Roads

- Maintain Fire Access roads with a 20' wide path that remains clear to the sky.

Fuel Ladders/Basic Fire Behavior

Before selecting and locating plants on a Fuel Modification plan a basic understanding of wildland fire behavior is the key factor in properly arranging plants. Eliminating and avoiding the creation of fuel ladders should be the chief concern. Understanding that anything planted in the landscape can become receptive fuel for wildfire: the way it is arranged and maintained will greatly influence fire intensity. The following diagrams will aide in arranging plant compositions wisely.

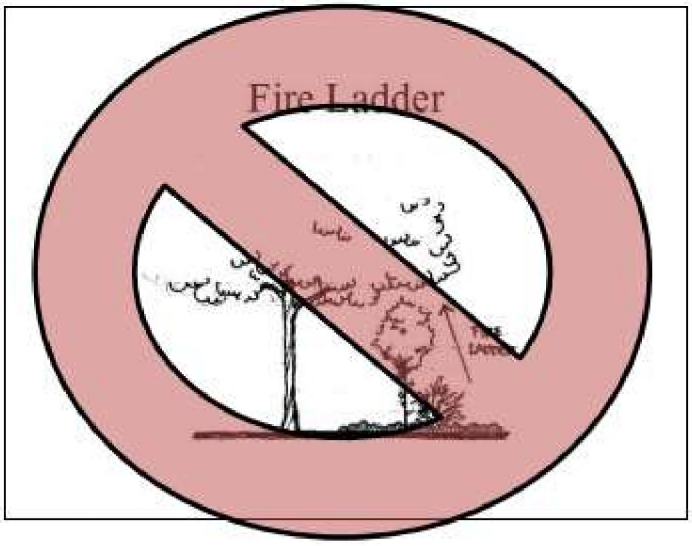


Figure 1: Fire Ladders or Fuel Ladders should be eliminated. The diagram above illustrates what not to do.



Figure 2: Eliminate the vertical and horizontal continuity. This is a good example of adequate separation.

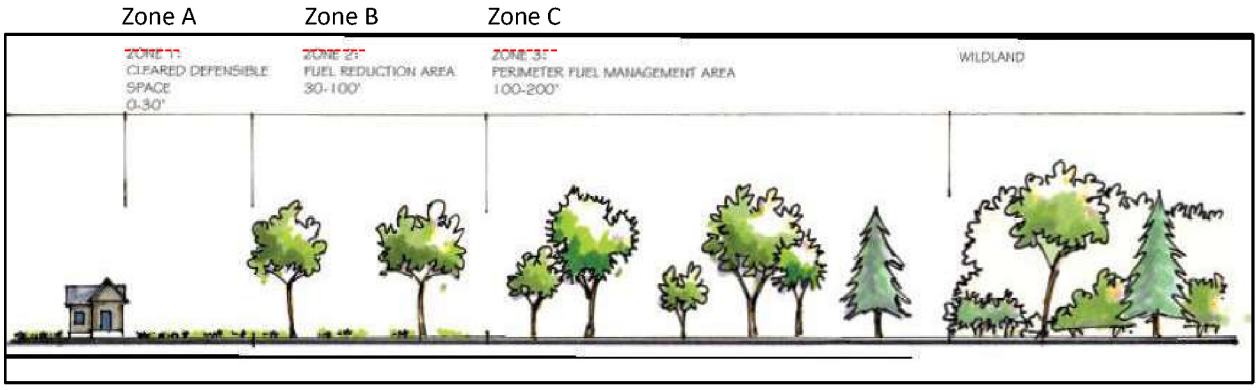


Figure 3: Note the progressive increase in density and arrangement moving away from the structure.

Plant Placement Do's

- Do: use "mass plantings" or herbaceous/succulents as ground covers even if they are not traditionally used as such. Mass plantings if properly selected, can eliminate fuel ladders.
- Do: plant using spacing resulting in near complete coverage at maturity.
- Do: consider using patio trees as an informal screen in Zone A.
- Do: consider vines as an alternative to hedges on walls or fences 10' from structures.
- Do: select varieties of plants that are slower growing and reach manageable sizes at maturity.
- Do: use plants that are appropriately scaled to the size of the property and structure. A single story house does not need to be shaded by a 100' tall Sweetgum.

Plant Placement Don'ts

- Don't plant hedges directly against structures. This includes espaliers of large shrubs not allowed in Zone A, or hedges taller than 6 feet or within 10' of the structure.
- Don't plant large shrubs and trees in continuous lines or large masses in Zones A or B.
- Don't plant at densities that result in an "instant landscape."
- Don't plant large species and use pruning to reduce overall size.
- Don't plant vines on structures. Vines become receptive fuel beds for embers (fire brands).
- Don't assume any plant is "fire proof." All plants will burn and assuming a plant is ignition resistant can be very misleading.
- Don't use large woody species in mass plantings.

Acceptable Plant Selections for Fuel Modification

The provided plant list is intended as a representative sample of plants appropriate for each zone, considering size, moisture content, leaf litter production and chemical composition. This list is not comprehensive, and designers may choose plants not on the list if plant characteristics are zone appropriate. Selecting regionally appropriate plants considering climate and microclimate adaptability is the designer's responsibility.

Undesirable Plants/Target Species

Plants listed below are not allowed as part of an approved Fuel Modification Plan. In addition to this list, designers should avoid planting known invasive plants such as Pampas grass and Hottentot Fig. If there are questions, please reference the California Invasive Plant Council.
http://www.cal-ipc.org/

*This list is not inclusive and some cultivars (dwarf etc.) within the genus listed may be acceptable.

Adenostoma fasciculatum – Chamise

Adenostoma sparsifolium – Red Shank

Artemesia californica – California Sagebrush

Eriogonum fasciculatum – Common Buckwheat

Cortaderia spp. – Pampas Grass

Cupressus spp. – Cypress

Eucalyptus spp – Eucalyptus

Jasminum humile – Italian Jasmine

Plumbago auriculata – Cape Plumbago

Tecoma capensis – Cape Honeysuckle

Example plant selections by zone begin on the next page.

Fuel Modification Plant List

Botanical Name	Common Name	Zone	Minimum distance from structure
Ground Cover			
Acacia redolens 'Desert Carpet'/'Low Boy'	Desert Carpet Acacia	B	30
Achillea tomentosa	Woolly Yarrow	A	
Ajuga reptans	Carpet Bugle	A	
Arctostaphylos (Prostrate Varieties)	Manzanita	B	
Artemisia californica (Cultivars)	Sagebrush - Prostrate Forms	B	30
Artemesia 'Powis Castle'	NCN	B	
Baccharis pilularis 'Pigeon Point'/'Twin Peaks'	Prostrate Coyote Brush	B	
Campanula poscharkyana	Serbian Bellflower	A	
Ceanothus gloriosus	Point Reyes Ceanothus	B	
Cerastium tomentosum	Snow-In-Summer	A	
Chamaemelum nobile	Chamomile	A	
Cistus salviifolius 'Prostratus'	Sageleaf Rockrose	B	
Coprosma kirkii	Mirror Plant	B	
Coreopsis auriculata 'Nana'	Tickseed	A	
Cotoneaster (Prostrate Varieties)	Cotoneaster	B	
Dalea greggii	Trailing Indigo Bush	B	
Delosperma alba	White Training Ice Plant	A	
Dichondra micrantha	Dichondra	A	
Drosanthemum floribundum	Rosea Ice Plant	A	
Duchesnea indica	Indian Mock Strawberry	A	
Dymondia margaretae	NCN	A	
Erigeron glaucus	Seaside Daisy	A	
E. karvinskianus	Santa Barbara Daisy	B	
Euonymus fortunei 'Colorata'	Purple-Leaf Winter Creeper	B	
Festuca cinerea(ovina'Glauca')	Blue Fescue	A	
F. rubra	Red Fescue	A	
Fragaria chiloensis	Wild Strawberrry	A	
Gazania Hybrids	Trailing Gazania	A	
Geranium incanum/sanguineum	Cranesbill	A	
Glechoma hederacea	Ground Ivy	A	
Helianthemum nummularium	Sunrose	A	
Herniaria glabra	Green Carpet	A	
Heuchera species and Cultivars	Coral Bells	A	
Hypericum calycinum/coris	Aaron's Beard	B	
Iberis sempervirens	Evergreen Candytuft	A	
Iva hayesiana	Poverty Weed	B	30
Juniperus (Prostrate species/cultivars)		B	
Laurentia fluviatilis	Blue Star Creeper	A	
Lysimachia nummularia	Moneywort	A	
Liriope spicata	Creeping Lily Turf	A	

Liriope muscari	Lily Turf	A	
Mahonia repens	Creeping Mahonia	B	
Myoporum 'Pacificum' & 'Putah Creek'	Pacific Myoporum	B	
M. parvifolium	NCN	A	
Oenothera berlandieri	Mexican Evening Primrose	B	
O. stubbei	Baja Evening Primrose	A	
Ophiopogon japonicus	Mondo Grass	A	
Pachysandra terminalis	Japanese Spurge	A	
Pelargonium peltatum/tomentosum	Ivy Geranium	A	
Persicaria capitata	Pink Clover	A	
Phlox subulata	Moss Pink	A	10
Phyla nodiflora (Lippia repens)	Lippia	A	
Potentilla tabernaemontanii	Spring Cinquefoil	A	
Ribes viburnifolium	Catalina Perfume	B	
Rosmarinus officinalis (Prostrate Varieties)	Prostrate Rosemary	B	30
Scaevola 'Mauve Clusters'	NCN	A	
Salvia sonomensis	Creeping Sage	B	
Sedum species	Stonecrops	A	
Senecio mandraliscae/serpens	Kleinia/Blue Chalksticks	A	
Soleirolia soleirolii	Baby's Tears	A	
Teucrium cossonii majoricum	Germander	A	
T. X lucidrys 'Prostratum'	Prostrate Germander	A	
Thymus species	Mother of Thyme	A	
Trachelospermum jasminoides	Star Jasmine	A	
Trifolium fragiferum	White Clover	A	
Verbena species (Prostrate Varities)	Garden Verbena	A	
Vinca minor	Dwarf Periwinkle	A	
Viola odorata	Sweet Violet	A	
Wedelia trilobata	Yellow Dot	B	
Zoysia tenuifolia	Korean Grass	A	
M r r r			
Acorous gramineous and Cultivars	Sweet Flag	A	
Agapanthus africanus	Lily of the Nile	A	
Alstroemeria cooperi	Peruvian Lily	A	
Armeria species	Thrifts	A	
Bamboos	Bamboo	B	30
Bergenia cordifolia	Heart Leaf Bergenia	A	
Cycas species	Cycads	A	
Cyrtomium falcatum	Holly Fern	A	
Davalia tricomanoides	Rabbits Foot Fern	A	
Epilobium canum	California Fuchia	B	
Helictotrichon sempervirens	Blue Oat Grass	A	15
Hemerocallis hybrids	Daylily	A	
Iris douglassiana	Coastal Iris	A	
Iris germanica	Bearded Iris	A	

Kalanchoe species	Kalanchoe	A	
Leymus condensatus 'Canyon Prince'	Canyon Prince Wild Rye	B	
Lobelia laxiflora		A	10
Pelargonium species	Geranium	A	
Penstemon species	Beard Tongue	A	
Plumeria	Plumeria	A	
Phlebodium aureum	Rabbits Foot Fern	A	
Tulbaghia violacea	Society Garlic	A	
Zephyranthes candida	Zephyr Lily	A	
r			
Abelia grandiflora (Prostrata)	Glossy Abelia	A	10
Abutilon hybridum	Flowering Maple	A	10
Acanthus mollis	Bear's Breech	A	
Agave species	Agave	A	
Aloe species	Aloe	A	
Alyogyne huegelii	Blue Hibiscus	A	10
Arbutus unedo (Dwarf Cultivars)	Dwarf Strawberry Tree	A	10
Arctostaphylos species	Manzanita	B	
Aucuba japonica	Japanese Aucuba	A	
Baccharis species	Various	B	
Berberis thunbergii	Japanese Barberry	B	
B. thunbergii ' prostrate cultivars'		A	10
Bougainvillea sp.	Bougainvillea	B	
Buddleja davidii	Butterfly Bush	B	
Buxus microphylla japonica	Japanese Boxwood	A	10
Caesalpinia (Shrub Forms)	Bird of Paradise Bush	A	10
Camellia species	Camellia	A	10
Calliandra californica/eriophylla	Baja Fairy Duster	B	
Callistemon citrinus	Lemon Bottlebrush	B	
C. viminalis "Little John"	NCN	A	10
Calycanthus occidentalis	Western Spice Bush	B	
Carissa macrocarpa and Cultivars	Natal Plum	A	10
Carpenteria californica	Bush Anemone	A	10
Cassia artemisioides	Feathery Cassia	A	30
Ceanothus species	Wild Lilac	B	30
Cercocarpus betuiloides	Mountain Mahogany	B	30
Choisya ternata	Mexican orange	B	
Cistus species	Rockrose	B	
Comarostaphylis diversifolia	Summer Holly	B	
Convolvulus cneorum	Bush Morning Glory	B	
Coprosma pumila/repens	Mirror Plant	B	
Cotoneaster species & cultivars	Cotoneaster	B	
Crassula species	NCN	A	
Cuphea hyssopifolia	False Heather	A	
Cycas revoluta	Sago Palm	A	

Dasylirion quadrangulatum/wheeleri	Mexican Grass Tree	A	10
Dendromecon harfordii	Island Bush Poppy	B	
Dietes bicolor/irioides	Fortnight Lily	A	
Dodonaea viscosa (Purpurea)	Hopseed Bush	B	
Elaeagnus pungens & cultivars	Silverberry	B	
Encelia californica	Coast Sunflower	A	10
E. farinosa	Brittle Bush	B	
Erigonum giganteum	St. Catherine's Lace	B	
Escallonia species	Escallonia	A	10
Euonymus japonica & cultivars	Evergreen Euonymus	A	10
Euphorbia species		A	
Euryops pectinatus	NCN	A	
Fatsia japonica	Japanese Aralia	A	
Fouquieria splendens	Ocotillo	A	
Fremontodendron species & cultivars	Flannel Bush	B	
Gardenia jasminoides	Gardenia	A	
Garrya elliptica	Coast Silktassel	B	
Grevillea species & cultivars	Grevillea	B	
Grewia occidentalis	Lavender Starflower	B	
Hakea suaveolens	Sweet Hakea	B	
Hebe species & cultivars	Hebe	A	10
Hesperaloe parviflora	Red Yucca	A	
Hibiscus rosa - sinensis	Chinese Hibiscus	A	10
Ilex species	Holly	B	
Juniperus species	Juniper	B	
Justicia brandegeana	Shrimp Plant	A	10
J. californica	Chuparosa	B	
Keckiella cordifolia	Heart-Leaved Penstemon	B	
Kniphofia uvaria	Red-Hot Poker	A	
Lantana Camara & hybrids	Lantana	A	10
Larrea tridentata	Creosote Bush	B	
Lavandula species	Lavender	A	10
Lavatera assurgentiflora/maritima	California Tree Mallow	B	
Leonotis leonrus	Lion's Tail	B	
Leptospermum scoparium & varities	New Zealand Tea Tree	B	
Leucophyllum species		B	
Ligustrum japonicum	Wax-leaf Privet	A	10
Lupinus species	Lupine	B	
Mahonia aquifolium ('Compacta')	Oregon Grape	A	10
M. fremontii	Desert Mahonia	B	
M. 'Golden Abundance'	NCN	B	
M. lomariifolia	Venetian Blind Mahonia	A	
Malosma - See Rhus			
Malva species	Mallow	A	10
Melaleuca nesophila	Pink Melaleuca	A	10
Mimulus species (Diplacus)	Monkey Flower	A	10
Myrica californica	Pacific Wax Myrtle	B	

Myrsine africana	African Boxwood	A	10
Myrtus communis 'Compacta'	Dwarf Myrtle	A	10
Nandina domestica (including dwarf varieties)	Heavenly Bamboo	A	
Nerium oleander	Oleander	B	
N.o. 'Petite Salmon'	NCN	A	10
Opuntia species	Prickly Pear, Cholla etc.	A	
Phlomis fruticosa	Jerusalem Sage	A	
Phoenix roebelenii	Pygmy Date Palm	A	
Phormium tenax and Cultivars	New Zealand Flax	A	
Photinia fraseri	Photinia	B	
Pittosporum tobira ('Variegata')	Tobira	B	
P.t.'Wheeler's Dwarf'	Dwarf Pittosporum	A	
Punica granatum 'Nana'	Dwarf Pomegranate	A	10
Prunus ilicifolia	Hollyleaf Cherry	B	
Pyracantha species	Firethorn	B	
Rhamnus california/crocea	Coffeeberry	B	
Rhaphiolepis indica and Cultivars	India Hawthorn	A	10
Rhus integrifolia/laurina	Lemonade Berry	B	40
R. ovata	Sugar Bush	B	30
Ribes species	Currant/Gooseberry	A	10
Romneya coulteri	Matilija Poppy	B	
Rosa species (except R. californica)	Rose	A	
Rosmarinus officinalis & cultivars	Rosemary	B	
Salvia species - native varieties	Sage	B	
S. greggii/leucantha	Autumn Sage	A	10
Santolina chamaecyparissus/rosmarinifolius	Lavender Cotton	A	10
Simmondsia chinensis	Jojoba	B	
Strelitzia nicolai/regina	Bird of Paradise	A	
Tagetes lemmonii	Copper Canyon Daisy	B	
Tibouchina urvilleana	Princess Flower	A	10
Trichostema lanatum	Wooly Blue Curls	B	
Viburnum species	Viburnum	A	10
Westringia fruticosa	Coast Rosemary	A	10
Xylosma congestum	Shiny Xylosma	B	
X.c. 'Compacta'	Compact Xylosma	A	10
Yucca species	Yucca	B	
r			
Acacia farnesiana	Sweet Acacia	A	15
A. greggii	Catclaw Acacia	B	
A. salicina	Willow Acacia	A	15
A. smallii	NCN	A	15
A. stenophylla	Shoestring Acacia	A	15
Acer negundo	Box Elder	B	
A. palmatum	Japanese Maple	A	
A. saccharinum	Silver Maple	B	30

Aesculus californica	California Buckeye	B	
Agonis flexuosa	Peppermint Tree	B	
Albizia julibrissin	Silk Tree	B	
Alnus rhombifolia	Alder	B	
Arbutus unedo ('Marina')	Strawberry Tree	A	15
Archontophoenix cunninghamiana	King Palm	A	
Bauhinia variegata	Purple Orchid Tree	B	
Betula pendula	European White Birch	A	10
Brachychiton acerifolius/populneus	Flame Tree/Bottle Tree	B	
Brahea armata/edulis	Blue Hesper Palm	A	10
Butia capitata	Pindo Palm	A	10
Callistemon citrinus	Lemon Bottlebrush	B	
C. viminalis	Weeping Bottlebrush	A	15
Calocedrus decurrens	Incense Cedar	B	
Calodendrum capense	Cape Chestnut	B	
Cedrus deodara	Deodar Cedar	B	30
Ceratonia siliqua	Carob	B	30
Cercidium floridum/microphyllum	Blue Palo Verde	A	
Cercis occidentalis/canadensis	Western Redbud	A	10
Chamaerops humilis	Mediterranean Fan Palm	A	10
Chilopsis linearis	Desert Willow	A	15
Chionanthus retusus	Chinese Fringe Tree	A	10
Chitalpa X tashkentensis	Chitalpa	A	10
Chorisia speciosa	Floss Silk Tree	B	
Cinnamomum camphora	Camphor Tree	B	30
Citrus species	Citrus	A	10
Cocculus laurifolius	Laurel Leaf Snail Seed	B	
Cordyline australis	Giant Dracaena	A	
Cyathea cooperi	Australian Tree Fern	A	
Dicksonia antarctica	Tazmanian Tree Fern	A	
Dracaena draco	Dragon Tree	A	
Eriobotrya deflexa/japonica	Bronze Loquat/Loquat	A	10
Erythrina species	Coral Tree	B	
Feijoa sellowiana	Pineapple Guava	A	10
Ficus species	Fig	B	50
Fraxinus species	Ash	B	30
Geijera parviflora	Australian Willow	A	15
Ginkgo biloba	Maidenhair Tree	A	15
Gleditsia triacanthos	Honey Locust	A	15
Grevillea robusta	Silk Oak	B	
Heteromeles arbutifolia	Toyon	A	15
Hymenosporum flavum	Sweetshade Tree	A	15
Jacaranda mimosifolia	Jacaranda	B	
Juglans californica	Black Walnut	B	
Koelreuteria bipinnata/paniculata	Chinese Flame Tree	B	
Lagerstroemia indica	Crape Myrtle	A	10
Laurus nobilis	Sweet Bay	B	

Leptospermum laevigatum	Australian Tea Tree	A	15
Liquidambar formosana	Chinese Sweet Gum	A	15
L. styraciflua	American Sweet Gum	B	
Liriodendron tulipfera	Tulip Tree	B	
Lithocarpus densiflorus	Tanbark Oak	B	
Lophpstemon confertus (Tristania)	Brisbane Box	A	15
Lyonothamnus floribundus	Catalina Ironwood	A	15
Magnolia grandiflora	Southern Magnolia	B	
M. X soulangeana	Saucer Magnolia	A	10
Maytenus boaria	Mayten Tree	A	10
Melaleuca quinquenervia	Cajeput Tree	A	15
Metasequoia glypstroboides	Dawn Redwood	A	15
Metrosideros excelsus	New Zealand Christmas Tree	A	10
Morus alba	White Mulberry	B	
Olea europea	Olive - Fruitless only	A	15
Parkinsonia aculeata	Jerusalem Thorn	A	10
Phoenix dactylifera	Date Palm	B	
Pinus species	Pine	B	75
Pistacia chinensis	Chinese Pistache	B	
Pittosporum phillyraeoides	Willow Pittosporum	A	10
P. rhombifolium	Queensland Pittosporum	B	
Platanus racemosa	California Sycamore	B	
Podocarpus gracilior/macrophyllus	Fern Pine/Yew Pine	B	
Populus fremontii	Fremont Cottonwood	B	
Prosopis chilensis	Chilean Mesquite	B	
P. glandulosa	Honey Mesquite	A	15
Prunus cerasifera 'Atropurpurea'	Purple-leaf Plum	A	10
Punica granatum	Pomegranate	B	
Pyrus calleryana/kawakamii	Ornamental Pear	A	15
Quercus species	Oak	B	30
Rhus lancea	African Sumac	B	
Robinia ambigua	Locust	B	
Sapium sebiferum	Chinese Tallow Tree	B	
Schefflera actinophylla	Queensland Unbrella Tree	A	
Sophora japonica	Japanese Pagoda Tree	B	
Stenocarpus sinuatus	Firewheel Tree	A	10
Syagrus romanzoffianum	Queen Palm	A	
Tabebuia species	Trumpet Tree	A	15
Tipuana tipu	Tipu Tree	B	
Tupidanthus calyptratus	Tupidanthus	A	
Trachycarpus fortunei	Windmill Palm	A	
Umbellularia californica	California Bay	B	
Washingtonia filifera	California Fan Palm	B	30
Zelkova serrata	Sawleaf Zelkova	B	

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
Studio City Sports Center, LLC
c/o Torino Companies
4455 Wagon Trail Avenue
Las Vegas, NV 89118

PREPARED BY
Simpson Gumpertz & Heger Inc.
757 S. Alameda Street, Suite 440
Los Angeles, CA 90021
O: 213.271.2000

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).

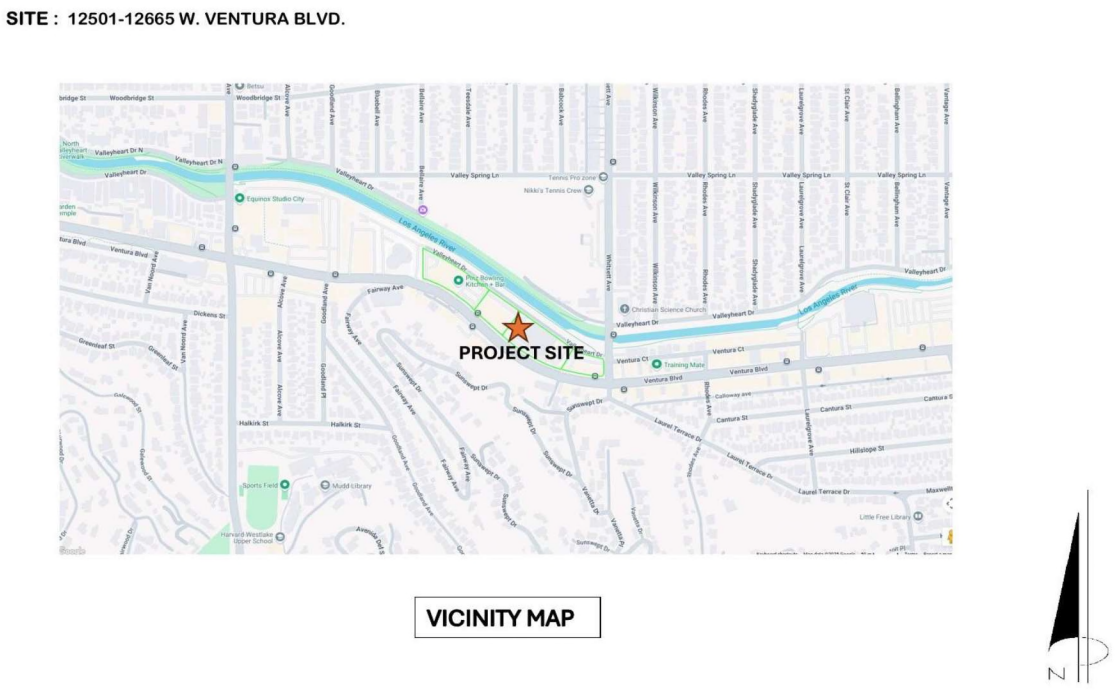


Figure 1 – Vicinity Map

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)

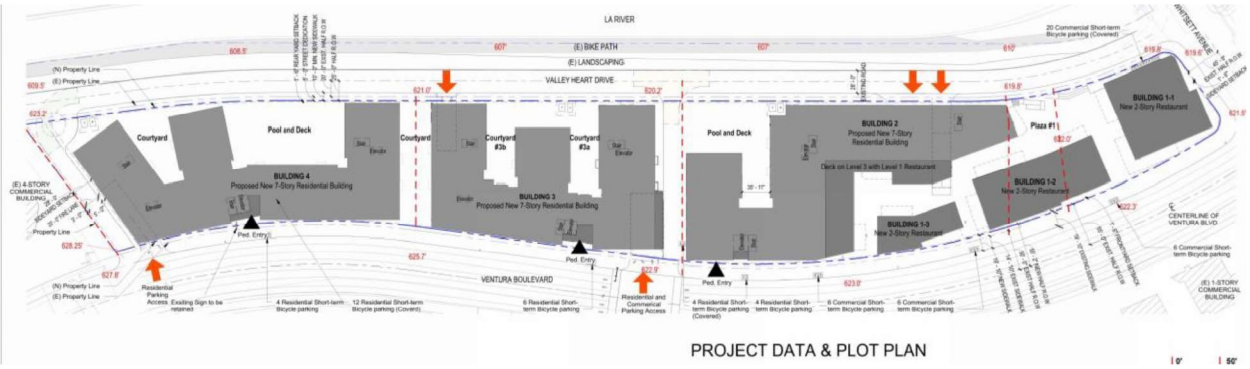


Figure 3 – Site Plan
(Sheet A-0.3A — Project Data and Plot Plan, MVE + Partners, dated 9/18/2025)

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.

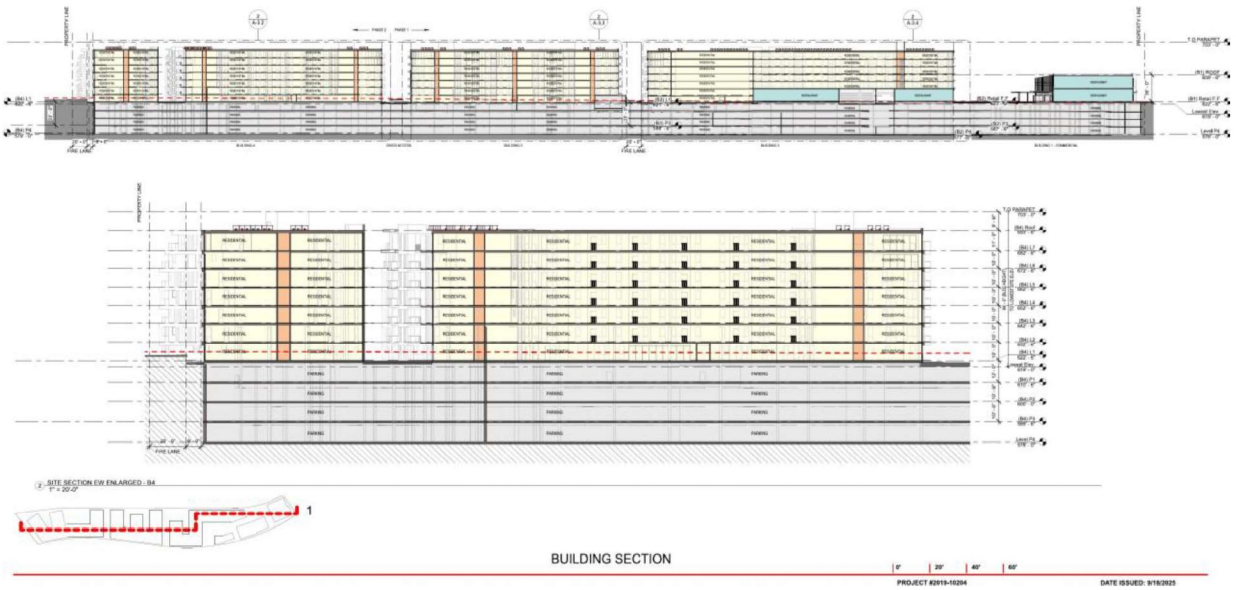


Figure 4 – Building Section (Sheet A-3.2, MVE + Partners)

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).



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.

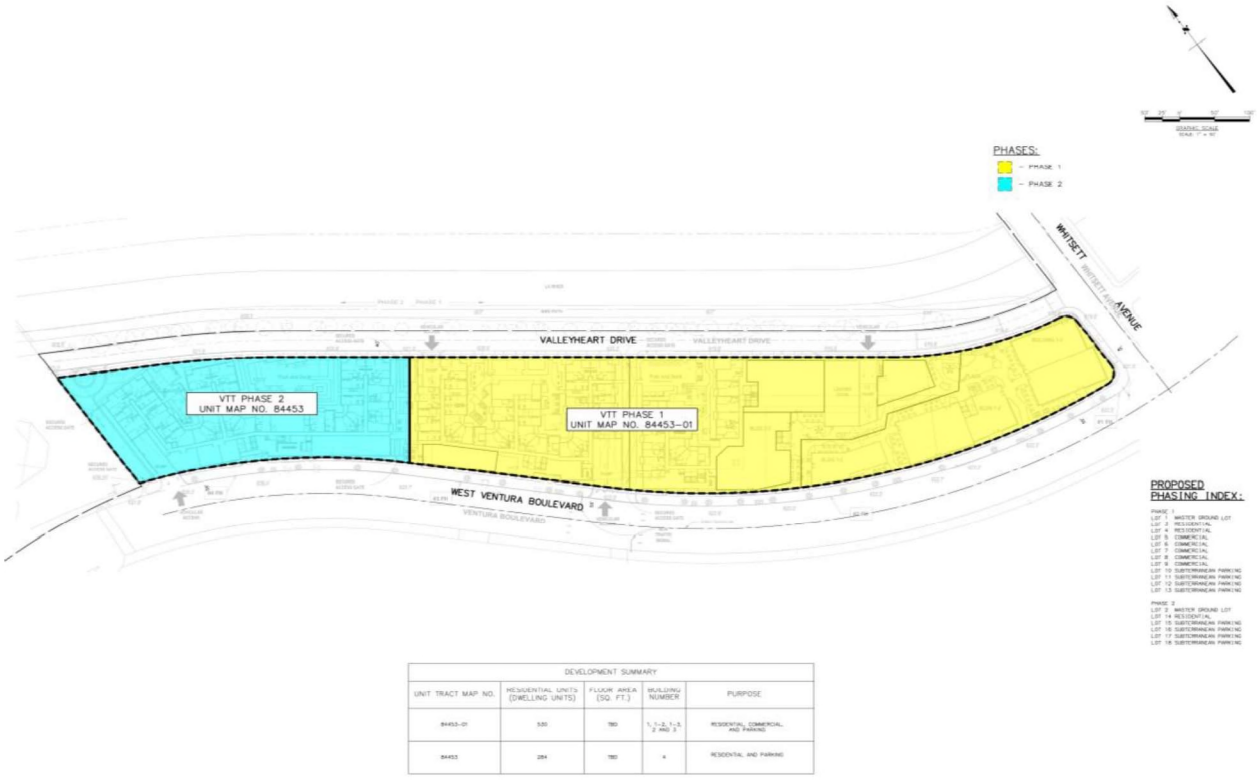


Figure 6 – Phasing Exhibit
(PL-1TTM01_PHASE-EXHIBIT_25-0611, Psomas, dated 11 June 2025)

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 LAFC, 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, Sections12-7A-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

0' | 80' | 160' | 240'

PROJECT #2019-10204

DATE ISSUED: 9/18/2025

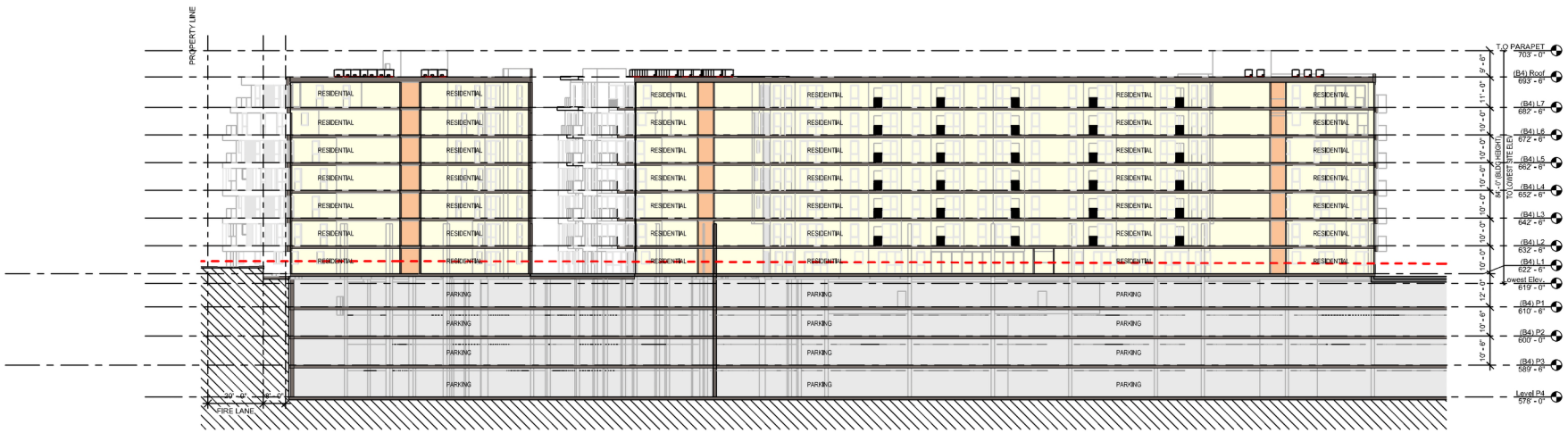
12555 VENTURA BLVD
STUDIO CITY, CA 91604

GENTON PROPERTY GROUP | RC DEVELOPMENT, INC. | TORINO | COMPANIES

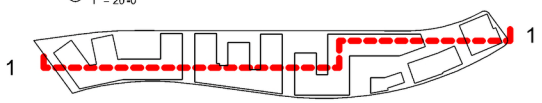
MVE + PARTNERS | AO Architecture, Design + Planning

A-9.1





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



BUILDING SECTION

0' | 20' | 40' | 60'

PROJECT #2019-10204

DATE ISSUED: 9/18/2025

GENTON PROPERTY GROUP | RC DEVELOPMENT, INC. | TORINO | COMPANIES

12555 VENTURA BLVD
STUDIO CITY, CA 91604

MVE + PARTNERS

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

Date	Inspector	Area / Zone	Deficiencies	Corrective Action	Complete (Y/N)

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.

<u>Phase 1 East Site:</u>

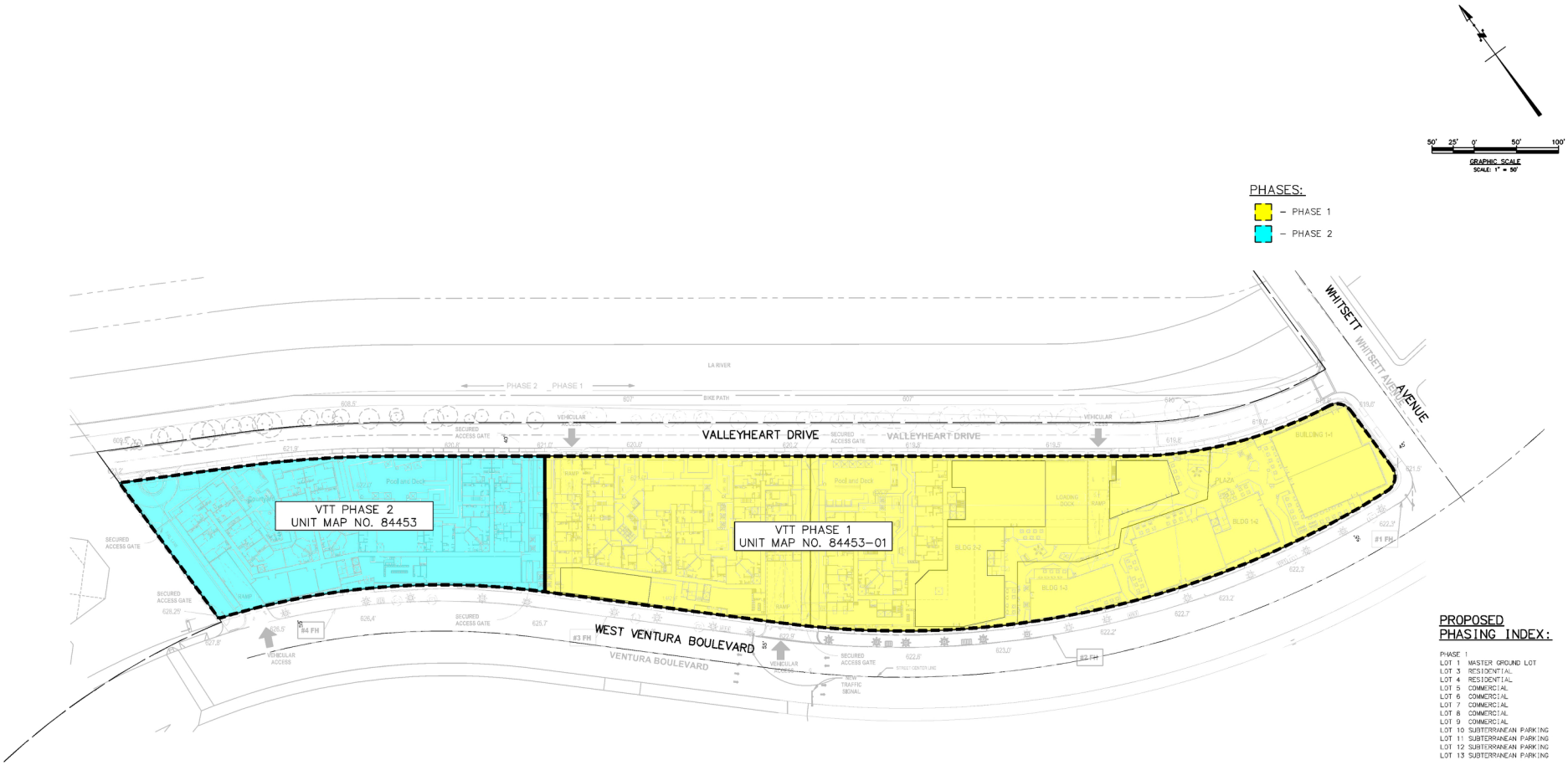
Demolition/ Sitework – Building 3 (12605 Ventura), Building 2 (12565 Ventura), Building 1 (12507 Ventura), - 5 Months Total
Excavation/Shoring/ Garage Construction – 22 months
Vertical Construction (Concurrent, staggered by 5 months)

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).

<u>Phase 2 West Site:</u>

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



PROPOSED PHASING INDEX:

PHASE 1
LOT 1 MASTER GROUND LOT
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

PHASE 2
LOT 2 MASTER GROUND LOT
LOT 14 RESIDENTIAL
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	PURPOSE
84453-01	530	TBD	1, 1-2, 1-3, 2 AND 3	RESIDENTIAL, COMMERCIAL, AND PARKING
84453	284	TBD	4	RESIDENTIAL AND PARKING

REAL PROFESSIONAL LAND SURVEYOR DANIEL L. RAMIREZ No. 8425 STATE OF CALIFORNIA

DESIGNED L.T.L.
DRAFTED L.T.L.
CHECKED D.L.R.

REV	DATE	DESCRIPTION	BY	APP'D

BENCHMARK
ELEVATION ADJUSTMENT
PLOTSCALE DATE:

PSOMAS
865 South Figueroa Street, Suite 3200
Los Angeles, CA 90017
(213) 223-1400 (213) 223-1444 fax
www.psomas.com

PHASING EXHIBIT FOR VESTING TENTATIVE TRACT MAP NO. 84453

12501 – 12665 WEST VENTURA BOULEVARD

IN THE CITY OF LOS ANGELES COUNTY OF LOS ANGELES STATE OF CALIFORNIA

DATE: MAY, 12, 2024
SCALE: 1" = 50'
PROJECT NUMBER: 1STU120100
SHEET 1 OF 1

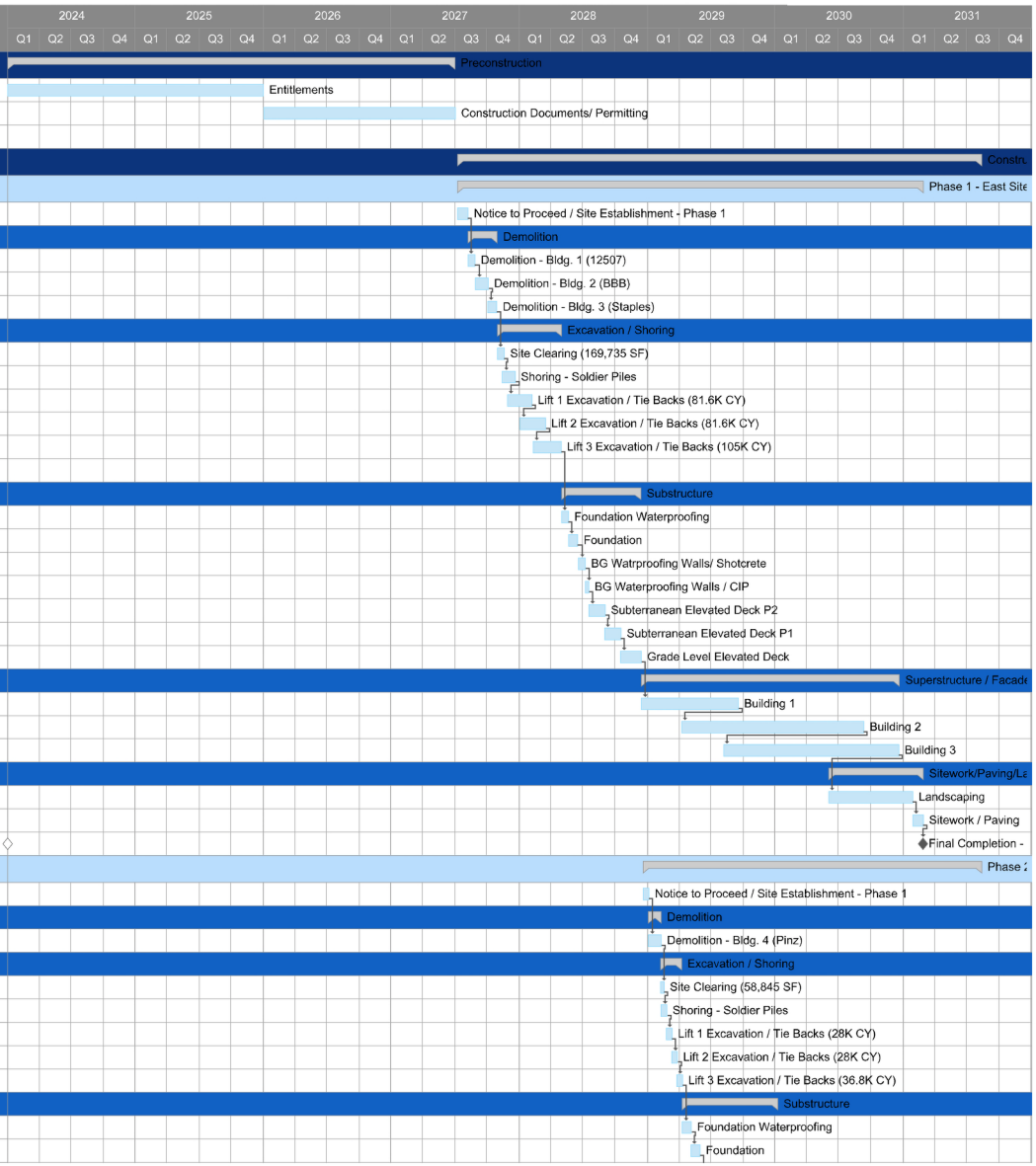
Promenade at Studio City - Baseline Construction Schedule

Construction Completed in Multiple Phase

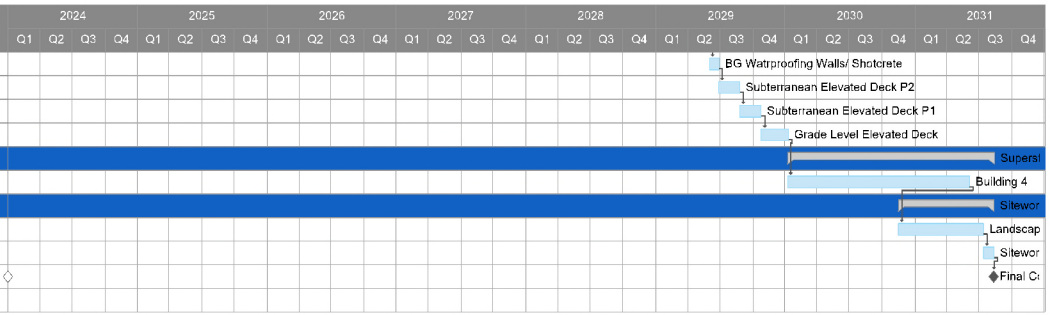
RAYTECH.

Rev. 00 - July 1st, 2024

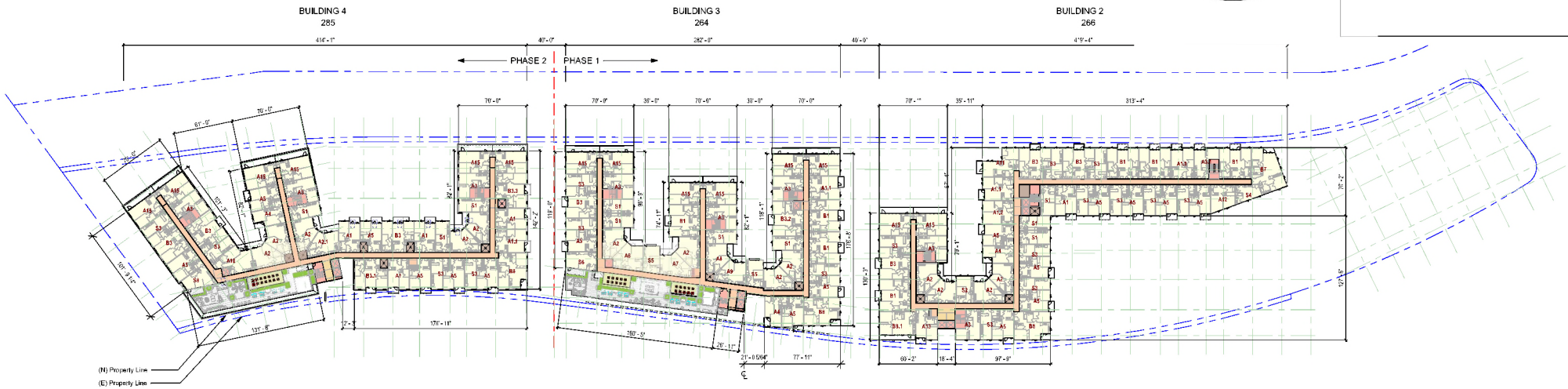
	Primary Column	Start Date	Finish Date	Duration CD
1	**Preconstruction**	**01/01/24**	**06/30/27**	**1277d**
2	Entitlements	01/01/24	12/29/25	729d
3	Construction Documents/ Permitting	01/01/26	06/30/27	546d
4				
5	**Construction**	**07/08/27**	**08/11/31**	**1496d**
6	**Phase 1 - East Site**	**07/08/27**	**02/26/31**	**1330d**
7	Notice to Proceed / Site Establishment - Phase 1	07/08/27	08/06/27	30d
8	**Demolition**	**08/07/27**	**10/29/27**	**84d**
9	Demolition - Bldg. 1 (12507)	08/07/27	08/27/27	21d
10	Demolition - Bldg. 2 (BBB)	08/28/27	10/01/27	35d
11	Demolition - Bldg. 3 (Staples)	10/02/27	10/29/27	28d
12	**Excavation / Shoring**	**10/30/27**	**04/29/28**	**183d**
13	Site Clearing (169,735 SF)	10/30/27	11/19/27	21d
14	Shoring - Soldier Piles	11/13/27	12/17/27	35d
15	Lift 1 Excavation / Tie Backs (81.6K CY)	11/28/27	02/05/28	70d
16	Lift 2 Excavation / Tie Backs (81.6K CY)	01/02/28	03/14/28	73d
17	Lift 3 Excavation / Tie Backs (105K CY)	02/09/28	04/29/28	81d
18	Backfill at Permanent Wall - Garage Divider			
19	**Substructure**	**04/30/28**	**12/13/28**	**228d**
20	Foundation Waterproofing	04/30/28	05/19/28	20d
21	Foundation	05/20/28	06/16/28	28d
22	BG Watrproofing Walls/ Shotcrete	06/17/28	07/06/28	20d
23	BG Waterproofing Walls / CIP	07/07/28	07/16/28	10d
24	Subterranean Elevated Deck P2	07/17/28	08/30/28	45d
25	Subterranean Elevated Deck P1	08/31/28	10/14/28	45d
26	Grade Level Elevated Deck	10/15/28	12/13/28	60d
27	**Superstructure / Facade / Interiors**	**12/14/28**	**12/18/30**	**735d**
28	Building 1	12/14/28	09/14/29	275d
29	Building 2	04/08/29	09/09/30	520d
30	Building 3	08/06/29	12/18/30	500d
31	**Sitework/Paving/Landscape / Final Completion**	**06/02/30**	**02/26/31**	**270d**
32	Landscaping	06/02/30	01/27/31	240d
33	Sitework / Paving	01/28/31	02/26/31	30d
34	Final Completion - Phase 1	02/26/31	02/26/31	0
35	**Phase 2 - West Site**	**12/19/28**	**08/11/31**	**966d**
36	Notice to Proceed / Site Establishment - Phase 1	12/19/28	01/02/29	15d
37	**Demolition**	**01/03/29**	**02/06/29**	**35d**
38	Demolition - Bldg. 4 (Pinz)	01/03/29	02/06/29	35d
39	**Excavation / Shoring**	**02/07/29**	**04/08/29**	**61d**
40	Site Clearing (58,845 SF)	02/07/29	02/07/29	1d
41	Shoring - Soldier Piles	02/08/29	02/22/29	15d
42	Lift 1 Excavation / Tie Backs (28K CY)	02/23/29	03/09/29	15d
43	Lift 2 Excavation / Tie Backs (28K CY)	03/10/29	03/24/29	15d
44	Lift 3 Excavation / Tie Backs (36.8K CY)	03/25/29	04/08/29	15d
45	**Substructure**	**04/09/29**	**01/06/30**	**273d**
46	Foundation Waterproofing	04/09/29	05/03/29	25d
47	Foundation	05/04/29	05/31/29	28d



	Primary Column	Start Date	Finish Date	Duration CD
48	BG Watrproofing Walls/ Shotcrete	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	Landscaping	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				



CITY OF LOS ANGELES, DEPARTMENT OF BUILDING AND SAFETY
PRELIMINARY ZONING ASSESSMENT COMPLETE
BY: MEGAN KOLP
DATE: 09/23/2025
APPLICATION #: 25010 - 10000 - 01328



LEVEL6 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	6
UNIT A11	1 BR	1
UNIT A12	1 BR	1
UNIT A13	1 BR	1

LEVEL6 UNIT COUNT (PER TYPE)		
Family	Unit Type	QUANTITY
UNIT B1	2 BR	4
UNIT B3	2 BR	3
UNIT B7	2 BR	1
UNIT B8	2 BR	1
UNIT A1	1 BR	1
UNIT A14	1 BR	1
UNIT B7.1	2 BR	1
UNIT B10	2 BR	3
		53
BUILDING 3		
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

LEVEL6 UNIT COUNT (PER TYPE)		
Family	Unit Type	QUANTITY
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 A15	1 BR	6
UNIT B1	2 BR	3
UNIT B3	2 BR	1
UNIT B3.2	2 BR	1
UNIT B8	2 BR	1
		38
BUILDING 4		
UNIT S1	STUDIO	3
UNIT S3	STUDIO	4

LEVEL6 UNIT COUNT (PER TYPE)		
Family	Unit Type	QUANTITY
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
		44
Grand total		135

UNIT COUNTS (PER BUILDING)			
UNIT TYPE	QUANTITY	Unit Mix	Ave Area
BUILDING 2			
STUDIO	80	30%	472 SF
1 BR	126	47%	662 SF
2 BR	60	23%	1,011 SF
	266	100%	684 SF
BUILDING 3			
STUDIO	79	30%	485 SF
1 BR	108	41%	649 SF
2 BR	77	29%	995 SF
	264	100%	701 SF
BUILDING 4			
STUDIO	64	23%	483 SF
1 BR	139	49%	665 SF
2 BR	81	29%	995 SF
	284	100%	718 SF
	814	**100%**	**701 SF**

LEVEL 6

0' 100' 200' 300'

GENTON PROPERTY GROUP | RC DEVELOPMENT, INC. | TORINO | COMPANIES

12555 VENTURA BLVD
STUDIO CITY, CA 91604

PROJECT #2019-10204

DATE ISSUED: 9/18/2025

MVE + PARTNERS

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



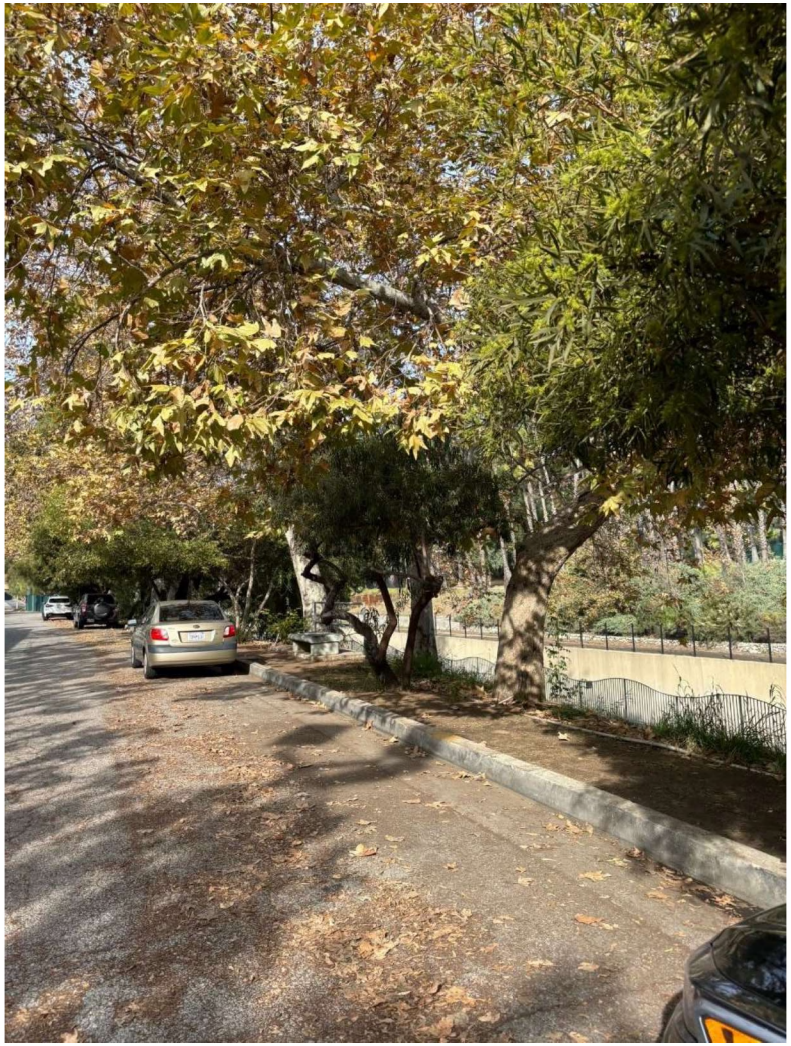
Facing southeast toward the Project Site on the west side of the Project Site

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



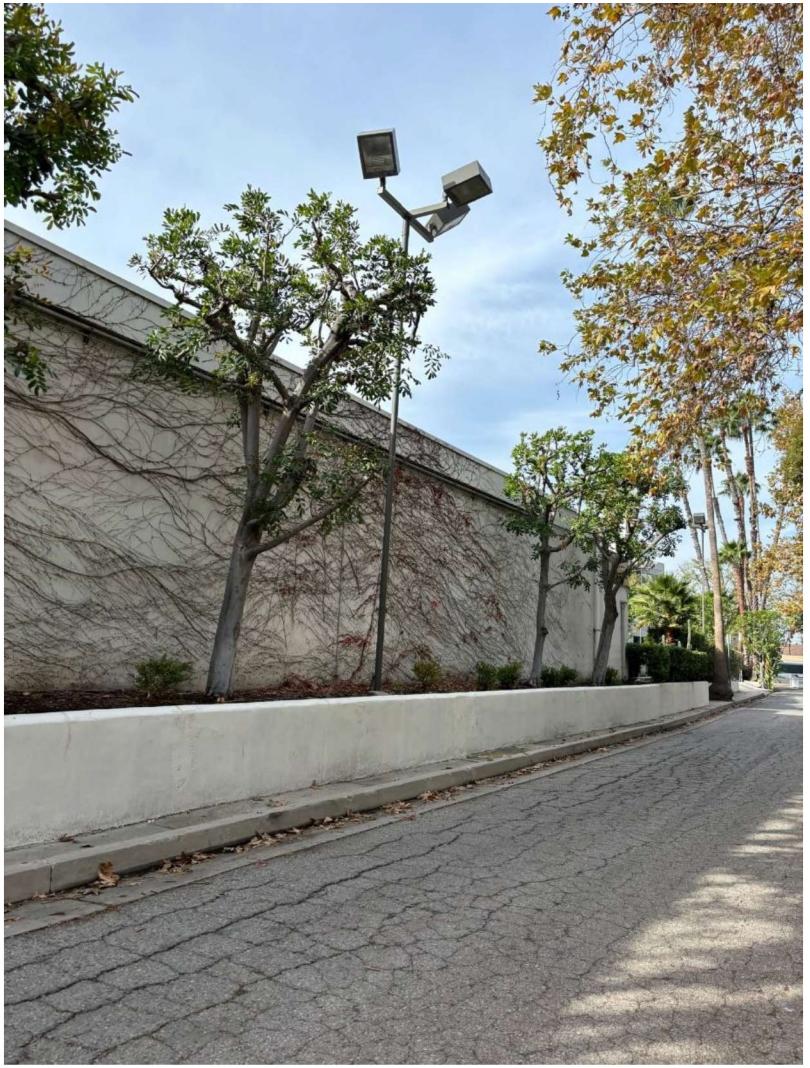
Facing north away from the Project Site on Valleyheart Dr.

7



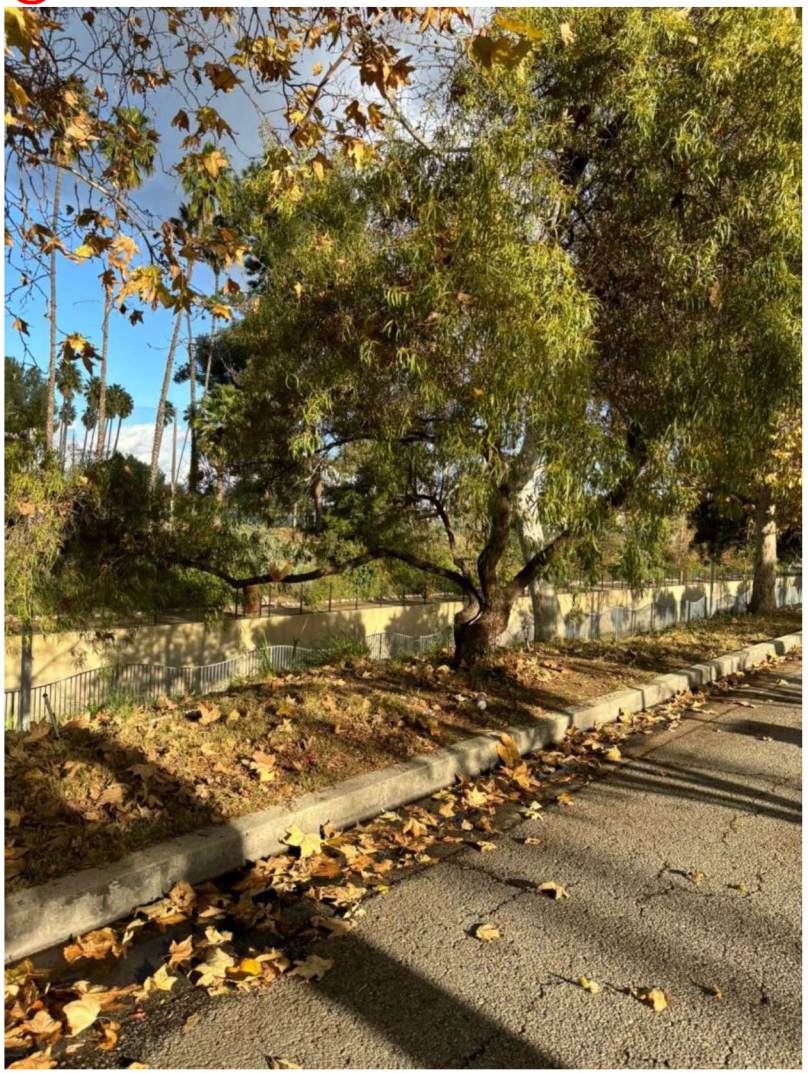
Facing southwest toward the Project Site on Valleyheart Dr.

8



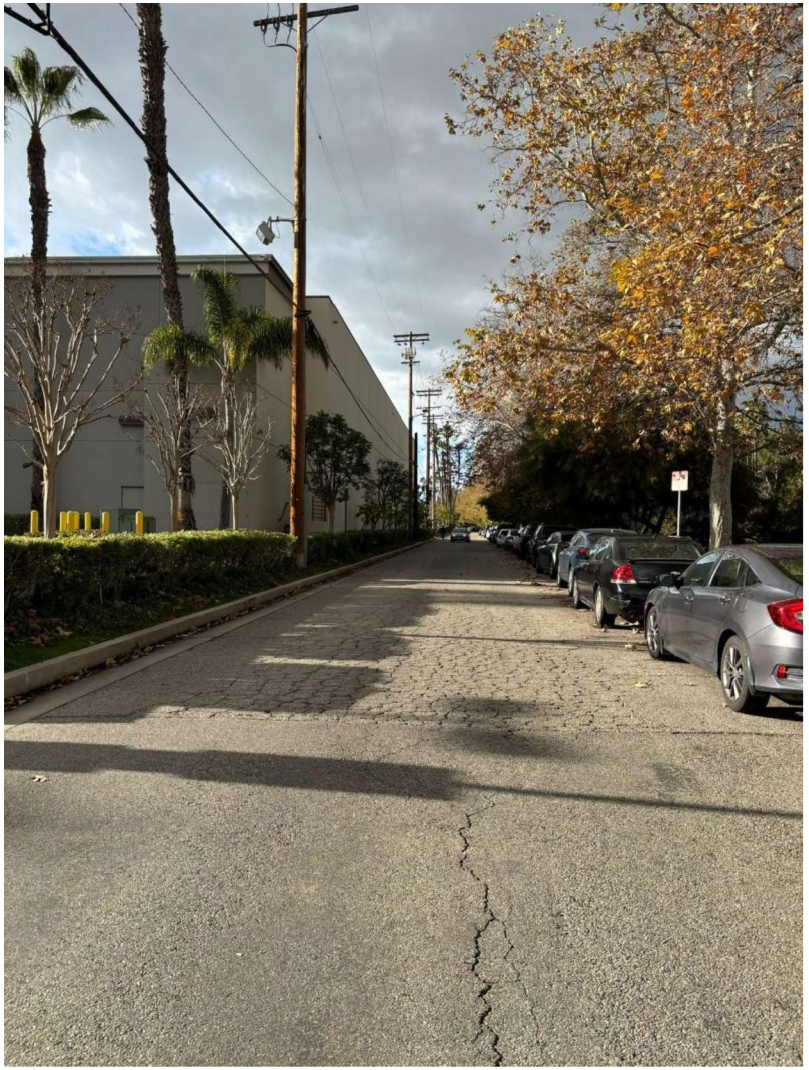
Facing southeast toward the Project Site on Valleyheart Dr.

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



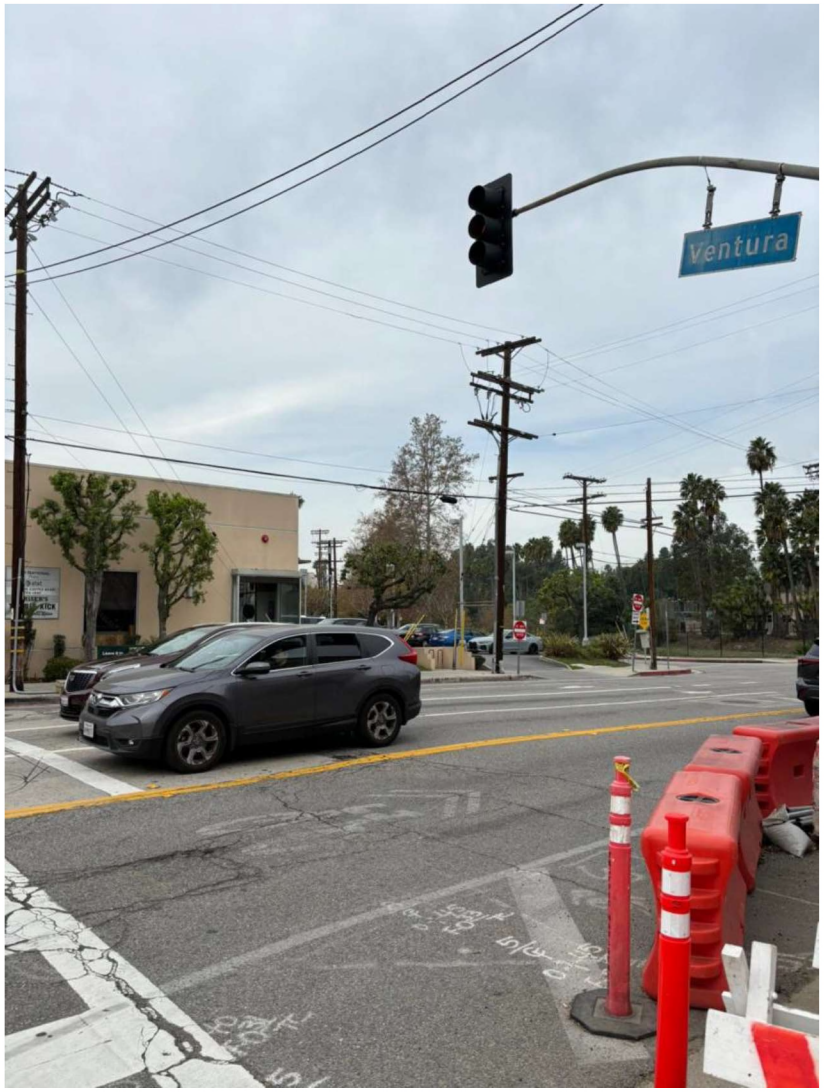
Facing east away from the Project Site on the corner of Whitsett Ave. and Valleyheart Dr.

14



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

15



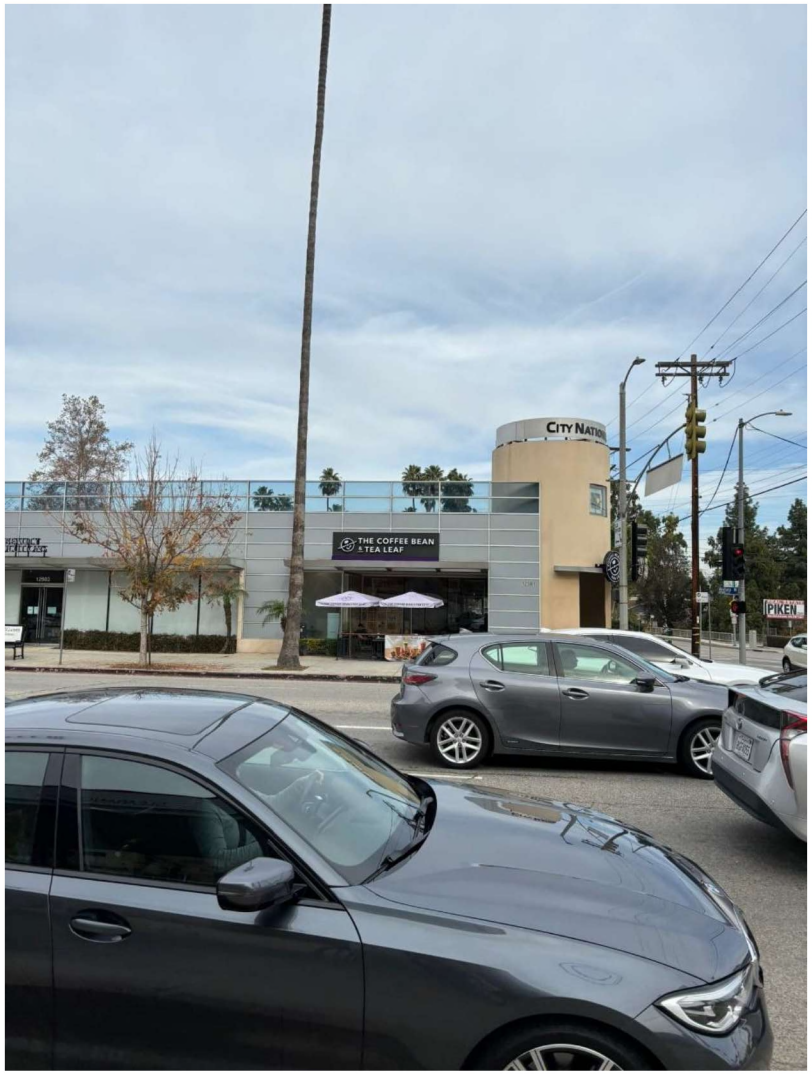
Facing northwest toward the Project Site on the northeast corner of Ventura Blvd. and Whitsett Ave.

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



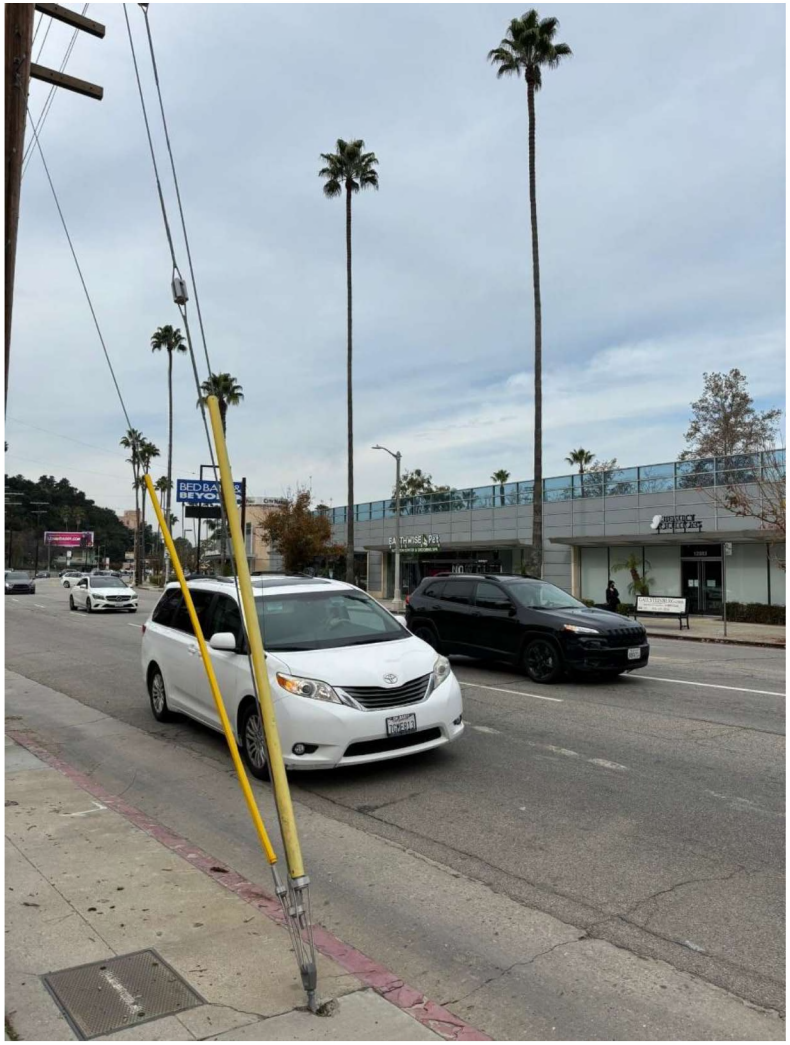
Facing northeast toward the Project Site on the southwest corner of Ventura Blvd. and Whitsett Ave.

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



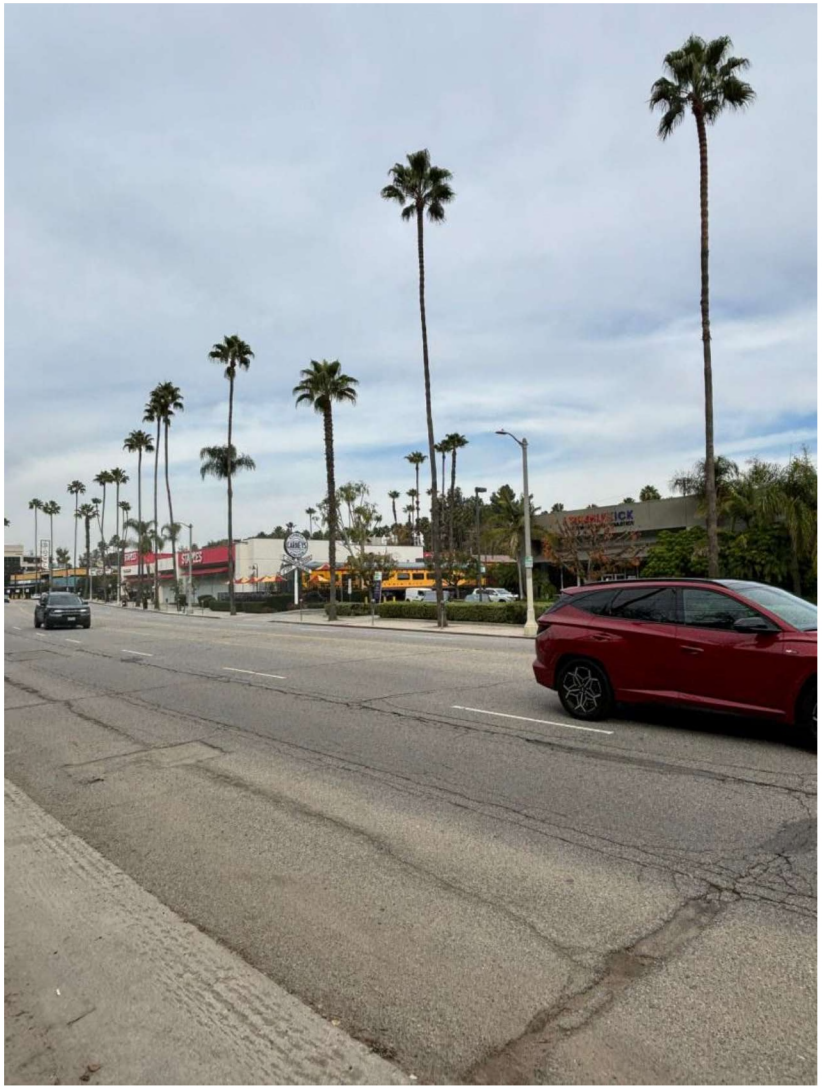
Facing north toward the Project Site on the south side of Ventura Blvd.

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



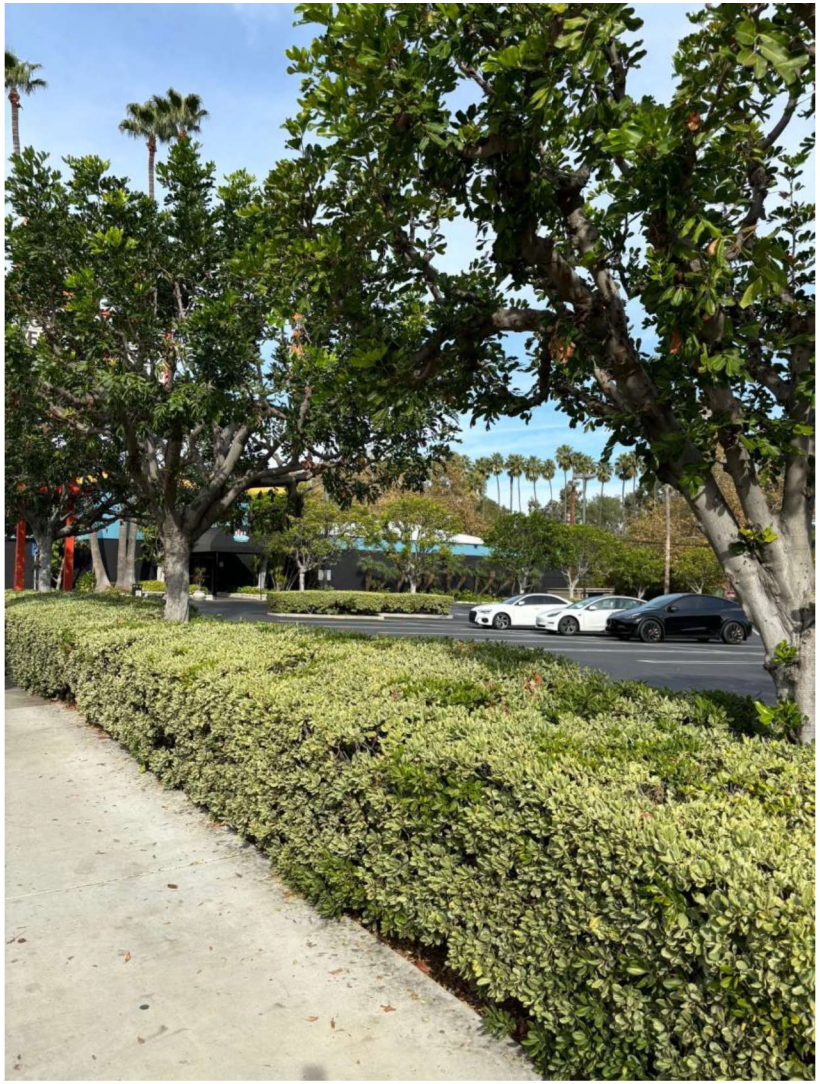
Facing west toward the Project Site on the north side of Ventura Blvd.

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



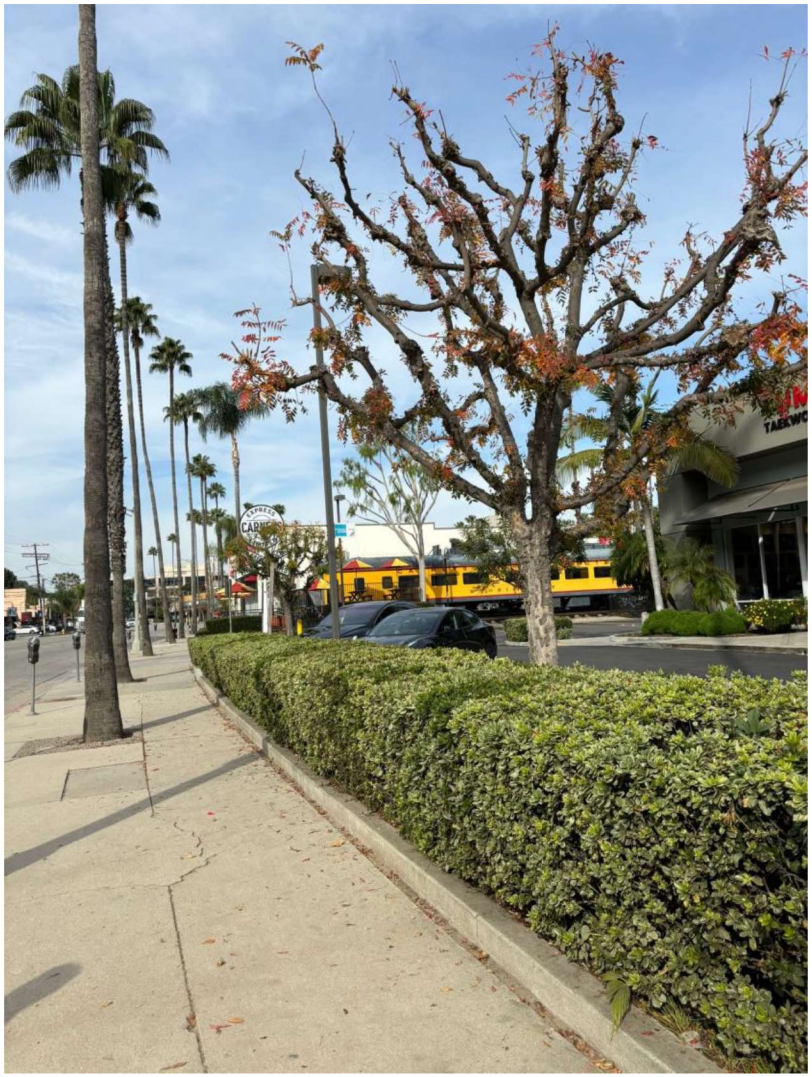
Facing south away from the Project Site on the north side of Ventura Blvd.

33



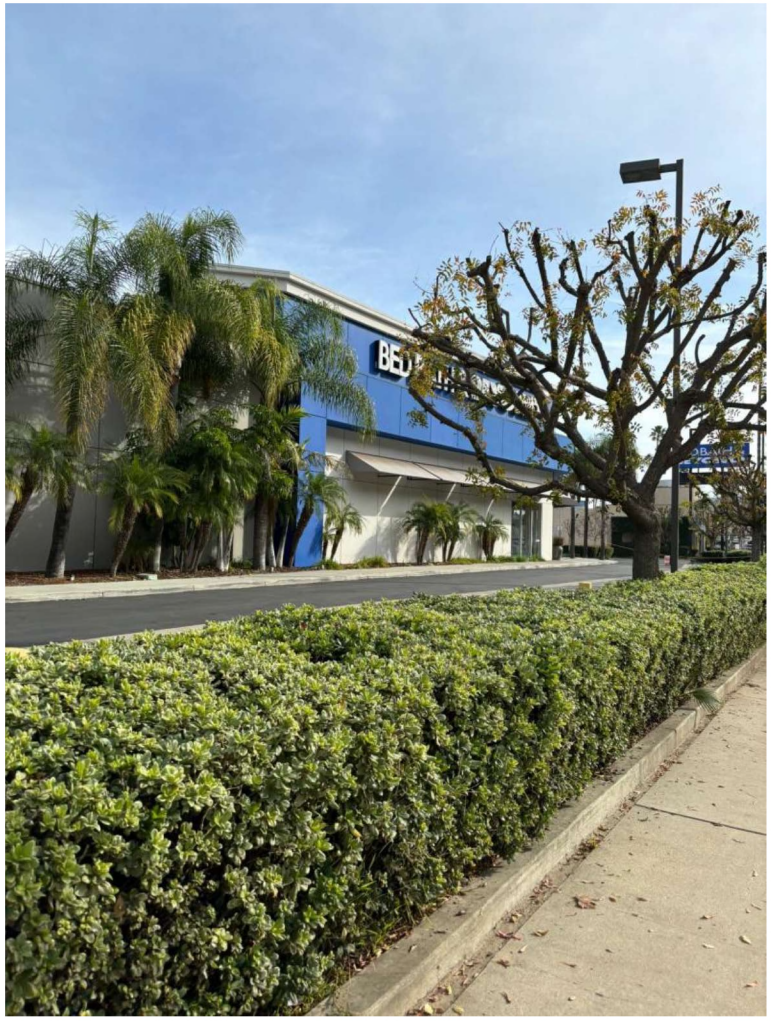
Facing northeast toward the Project Site on the north side of Ventura Blvd.

34



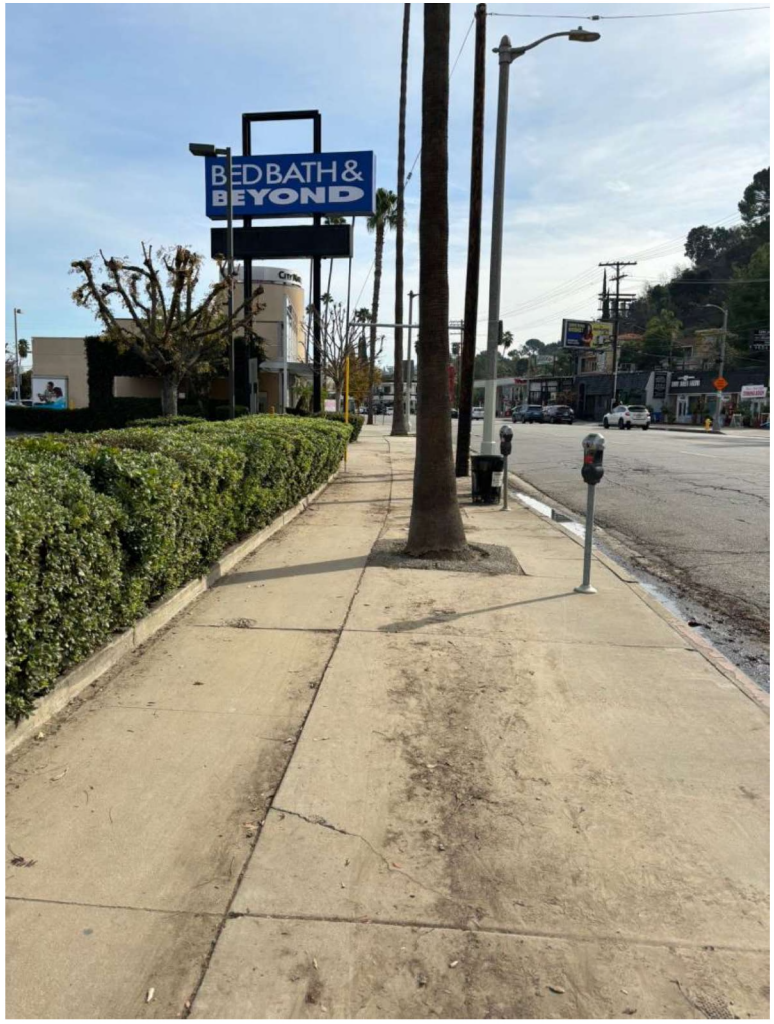
Facing west toward the Project Site on the north side of Ventura Blvd.

35



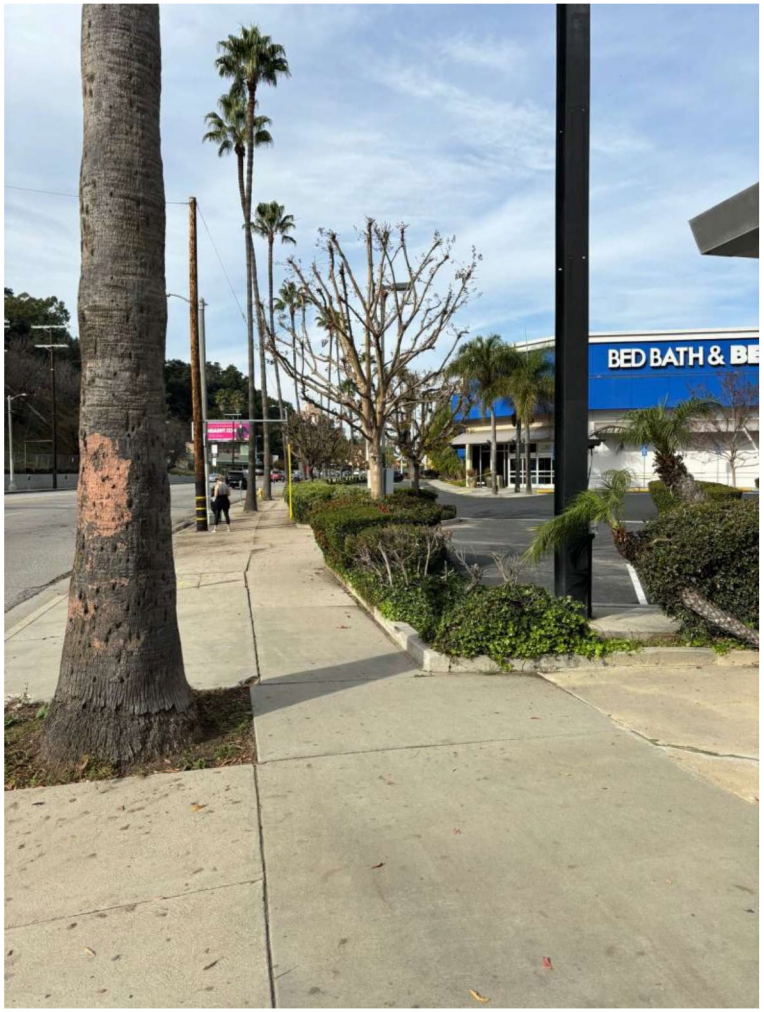
Facing northeast toward the Project Site on the north side of Ventura Blvd.

36



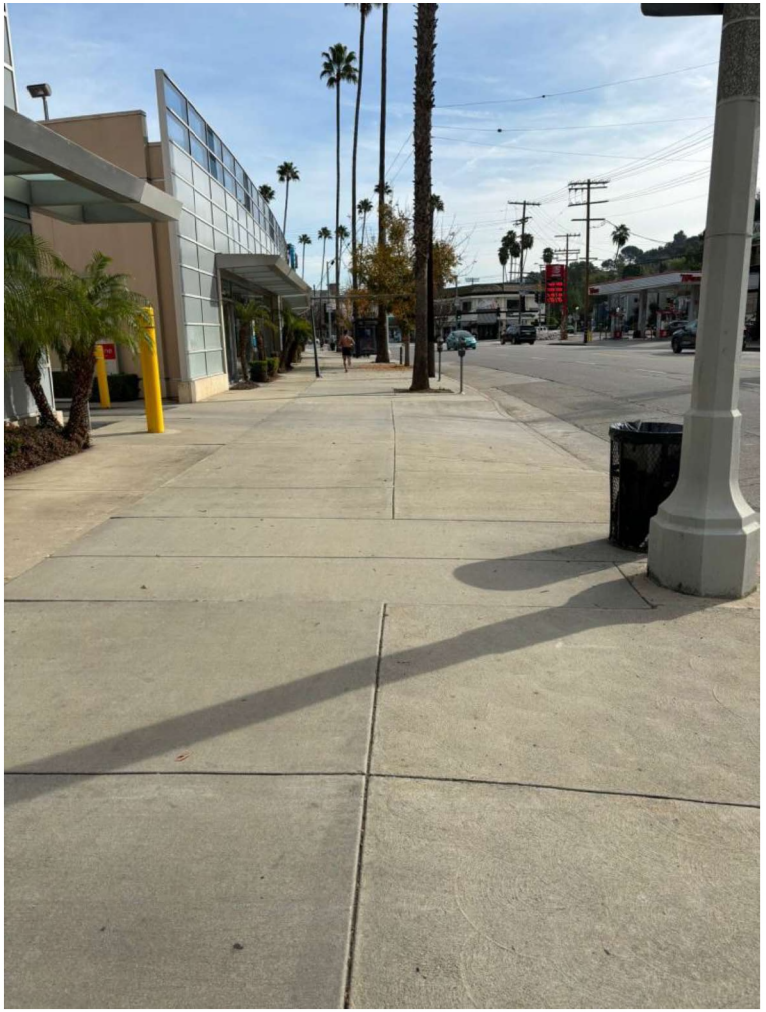
Facing east toward the Project Site on the north side of Ventura Blvd.

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.

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



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.

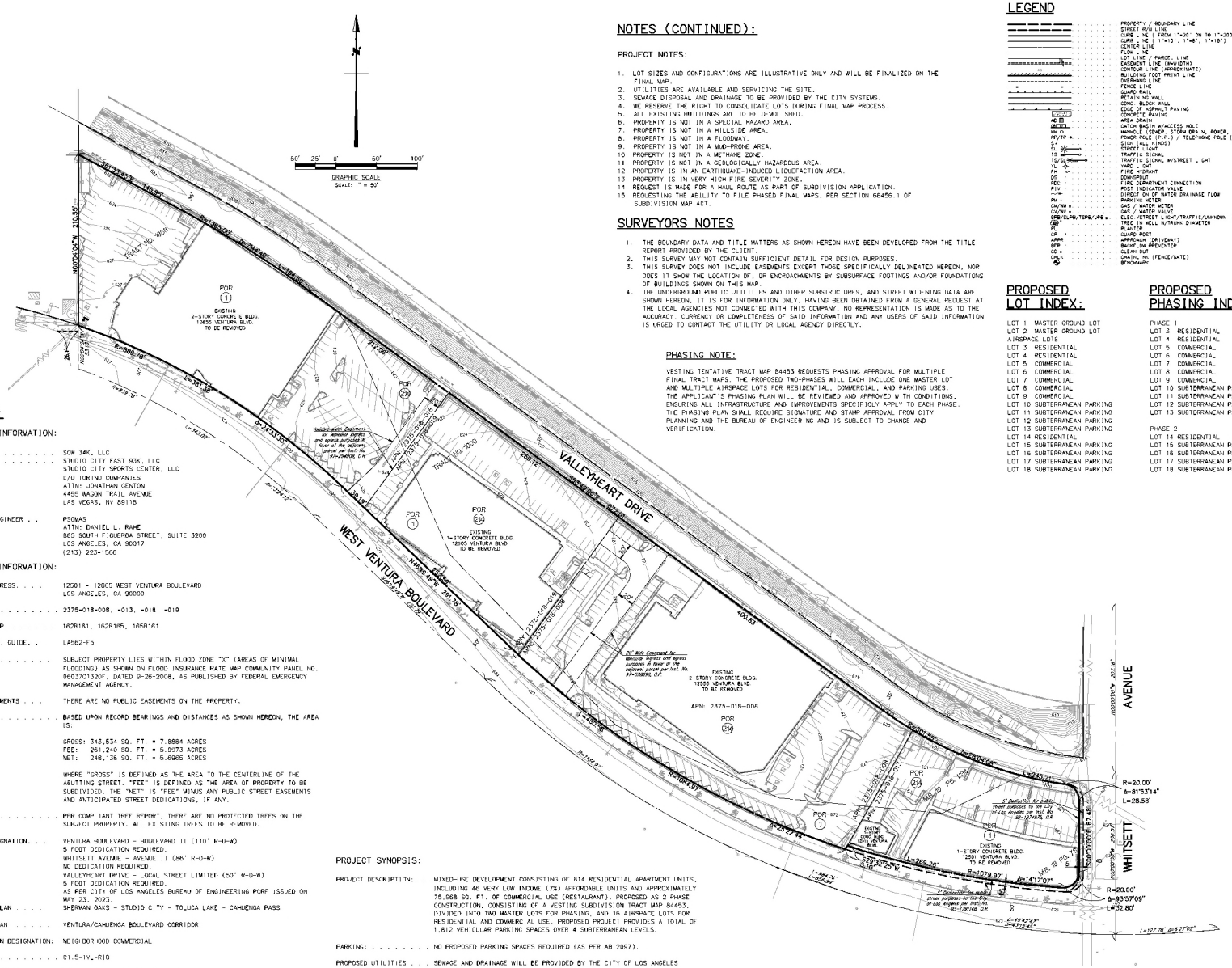
- **Phasing:** The phased structure of the tract map is documented in the Phasing Exhibit (PL-1TTM01_PHASE-EXHIBIT_25-0611, Psomas, dated 6/11/2025), provided as Appendix G, Exhibit G-2.

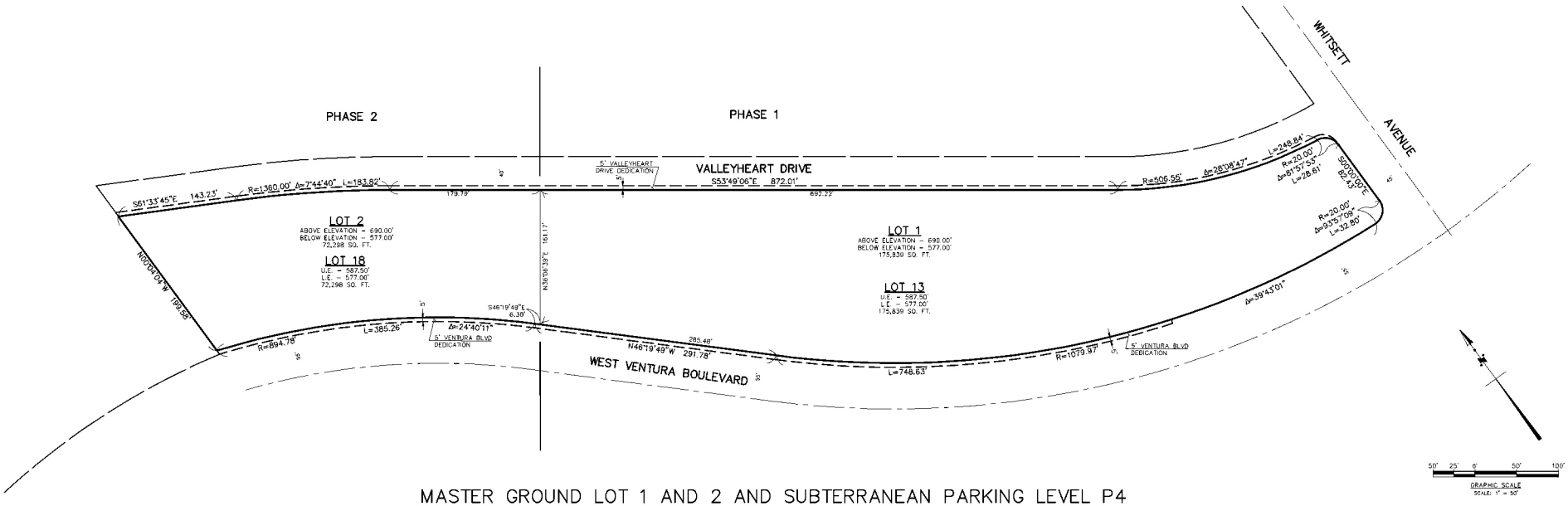
I.4 Substantive Tract Map Record and Pending Planning Commission Action

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.

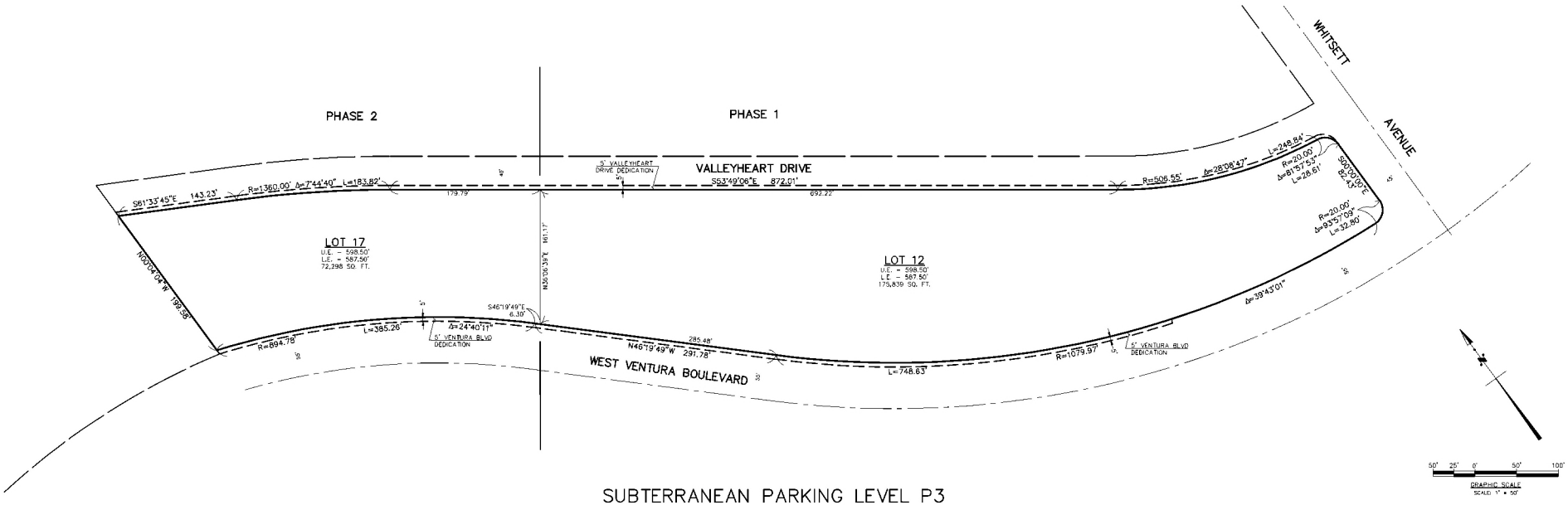
I.5 Exhibit

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


N
50' 25' 0' 50' 100'
GRAPHIC SCALE
SCALE: 1" = 50'
VALLEYHEART DRIVE
WEST VENTURA BOULEVARD
WHITSETT AVENUE
TRACT NO. 10000
TRACT NO. 10000-2
TRACT NO. 35565
POR 1
POR 2A
EXISTING 2-STORY CONCRETE BLDG. 12501 VENTURA BLVD. TO BE REMOVED
EXISTING 1-STORY CONCRETE BLDG. 12605 VENTURA BLVD. TO BE REMOVED
EXISTING 2-STORY CONCRETE BLDG. 12555 VENTURA BLVD. TO BE REMOVED
EXISTING 1-STORY CONCRETE BLDG. 12501 VENTURA BLVD. TO BE REMOVED
APN: 2375-018-008
APN: 2375-018-009
APN: 2375-018-019
N00°00'00"W 210.46'
S89°58'47"W 140.33'
R=889.67'
L=391.38'
R=1085.00'
L=277.00'
N89°58'47"E 258.74'
S89°58'47"W 400.83'
N00°01'13"W 209.78'
N89°58'47"E 259.14'
S00°01'13"E 209.78'
R=1085.00'
L=245.71'
R=20.00'
Δ=81°53'14"
L=28.58'
R=1079.96'
Δ=14°17'03"
R=20.00'
Δ=93°57'09"
L=32.80'
L=127.78'
S89°27'08"E 2619.32'
S89°27'08"E 2619.32'
S89°27'08"E 2619.32



MASTER GROUND LOT 1 AND 2 AND SUBTERRANEAN PARKING LEVEL P4



SUBTERRANEAN PARKING LEVEL P3

PROPOSED CONDITIONS

PROFESSIONAL LAND SURVEYOR DANIEL L. WHITE No. 9425 STATE OF CALIFORNIA

DESIGNED L.T.L.
DRAFTED L.T.L.
CHECKED D.L.R.

BENCHMARK: CITY OF LOS ANGELES BM NO. 08-07350
SQ. SPK. IN W CURB WHITSETT AVE; 60FT N OF CTR LINE PRODUCED; OF VALLEY HEART DR FROM EAST; S END OF CB
ELEVATION: 618.956 FEET NAVD 88 ADJUSTMENT: 2000
PATENTLY DATE:

PSOMAS
865 South Figueroa Street, Suite 3200
Los Angeles, CA 90017
(213) 223-1400 (213) 223-1444 fax
www.psomas.com

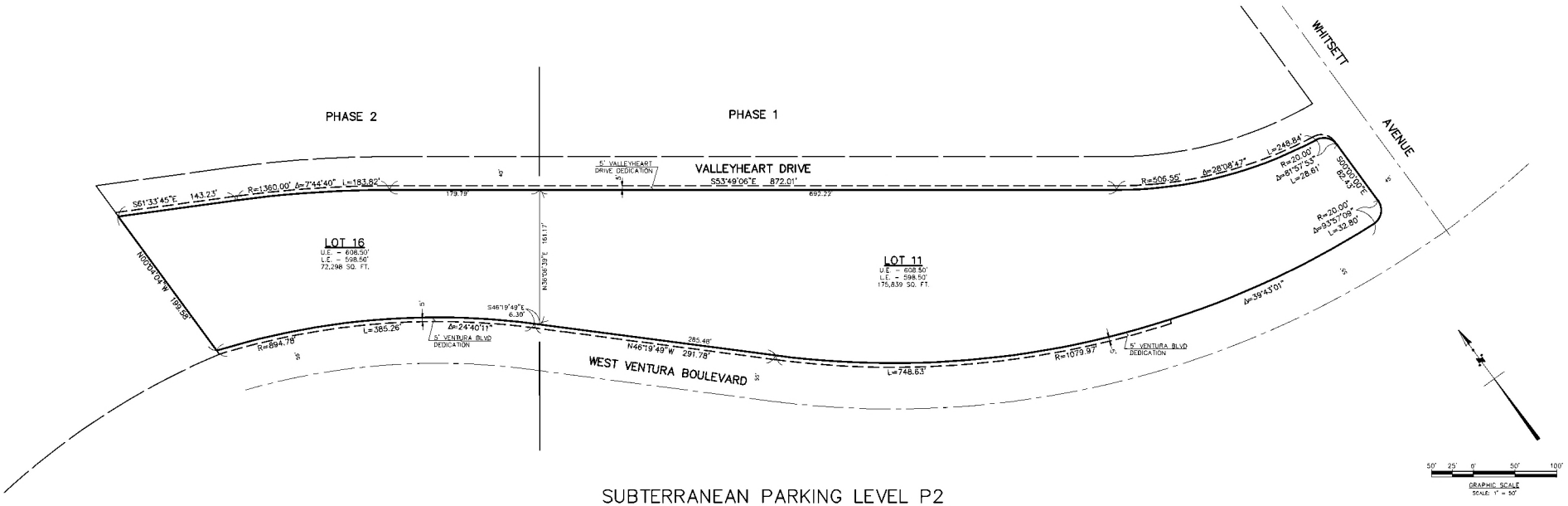
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VESTING TENTATIVE TRACT MAP NO. 84453

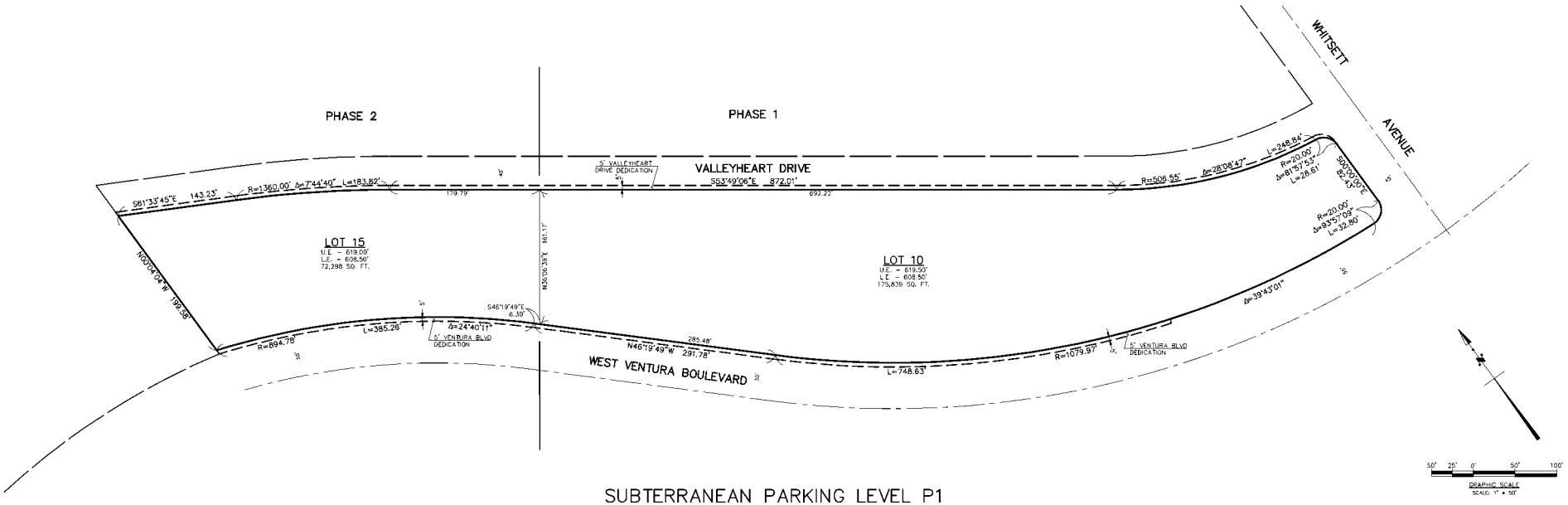
12501 - 12665 WEST VENTURA BOULEVARD
LOS ANGELES, CA 91604

IN THE CITY OF LOS ANGELES COUNTY OF LOS ANGELES STATE OF CALIFORNIA

DATE: MARCH 26, 2025
SCALE: 1" = 50'
PROJECT NUMBER: 1STU120100
SHEET 2 OF 5



SUBTERRANEAN PARKING LEVEL P2



SUBTERRANEAN PARKING LEVEL P1

PROPOSED CONDITIONS

PROFESSIONAL LAND SURVEYOR DANIEL L. WHITE No. 9425 STATE OF CALIFORNIA

DESIGNED L.T.L.
DRAFTED L.T.L.
CHECKED D.L.R.

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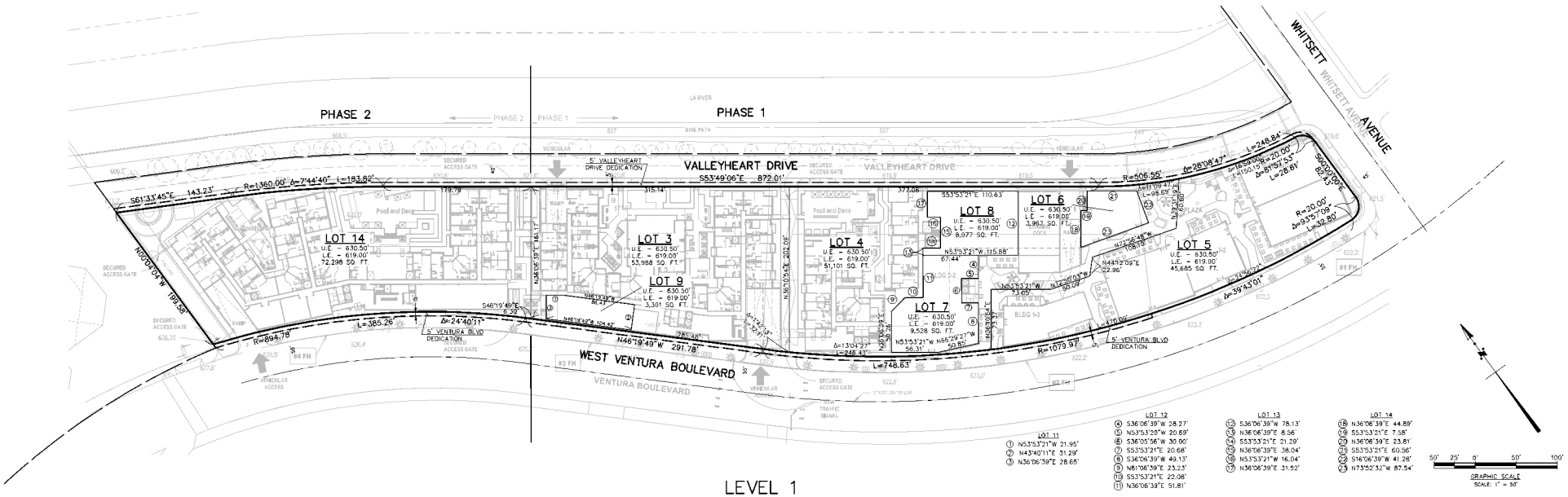
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VESTING TENTATIVE TRACT MAP NO. 84453

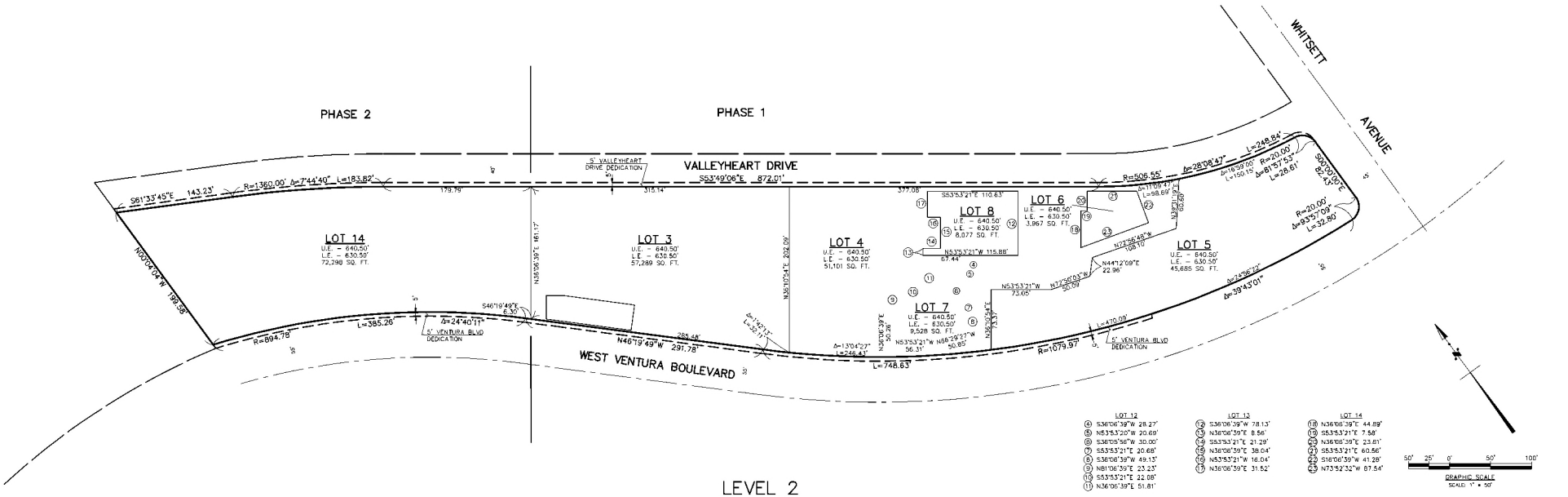
12501 - 12665 WEST VENTURA BOULEVARD
LOS ANGELES, CA 91604

IN THE CITY OF LOS ANGELES COUNTY OF LOS ANGELES STATE OF CALIFORNIA

DATE: MARCH 26, 2025
SCALE: 1" = 50'
PROJECT NUMBER: 1STU120100
SHEET 3 OF 5



LEVEL 1



LEVEL 2

PROPOSED CONDITIONS

PROFESSIONAL LAND SURVEYOR DANIEL L. WHITE No. 9425 STATE OF CALIFORNIA

PREPARED	L.T.L.
DRAFTED	L.T.L.
CHECKED	D.L.R.

REV	DATE	DESCRIPTION	BY	APPD

BENCHMARK: CITY OF LOS ANGELES BM NO. 08-07350
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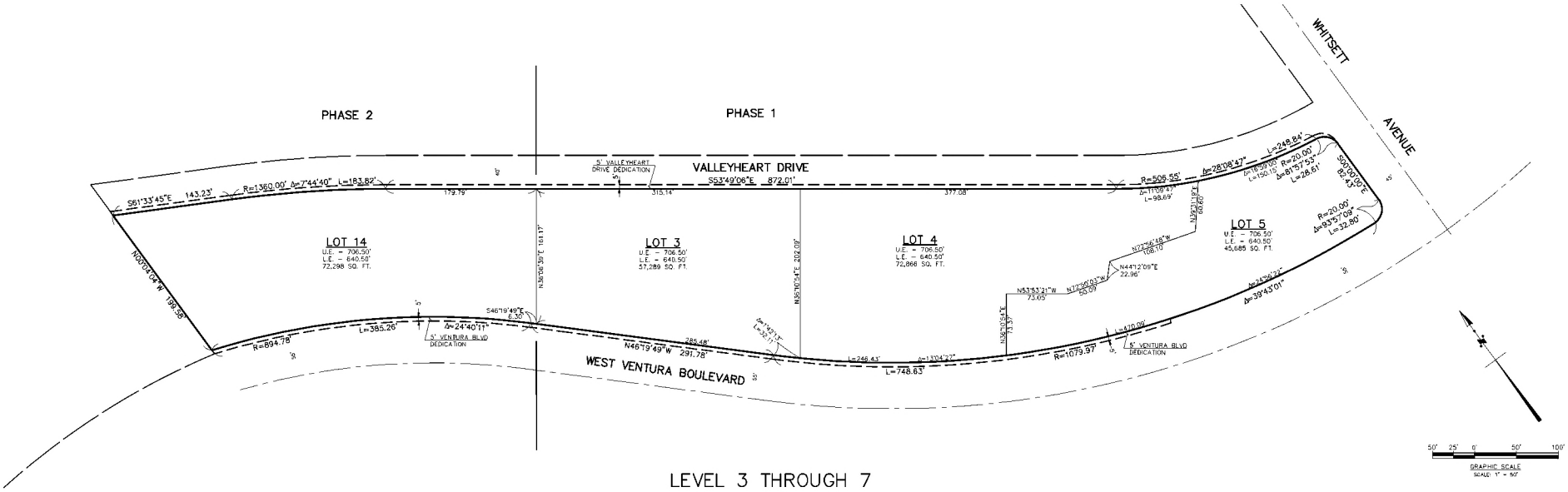
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LOS ANGELES, CA 91604

IN THE CITY OF LOS ANGELES COUNTY OF LOS ANGELES STATE OF CALIFORNIA

DATE	MARCH 26, 2025
SCALE	1" = 50'
PROJECT NUMBER	1STU120100
SHEET	4
OF	5



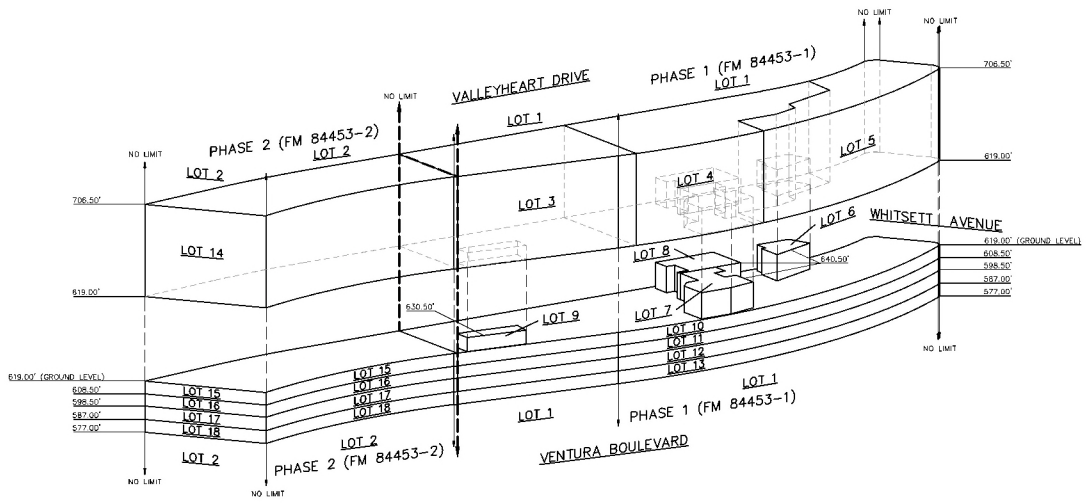
LEVEL 3 THROUGH 7
PROPOSED CONDITIONS

PROPOSED LOT INDEX:

LOT 1	MASTER GROUND LOT
LOT 2	MASTER GROUND LOT
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	RESIDENTIAL
LOT 15	SUBTERRANEAN PARKING
LOT 16	SUBTERRANEAN PARKING
LOT 17	SUBTERRANEAN PARKING
LOT 18	SUBTERRANEAN PARKING

PROPOSED PHASING INDEX:

PHASE 1	
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
PHASE 2	
LOT 14	RESIDENTIAL
LOT 15	SUBTERRANEAN PARKING
LOT 16	SUBTERRANEAN PARKING
LOT 17	SUBTERRANEAN PARKING
LOT 18	SUBTERRANEAN PARKING



ISOMETRIC

DESIGNED L.T.L.
DRAFTED L.T.L.
CHECKED D.L.R.

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IN THE CITY OF LOS ANGELES COUNTY OF LOS ANGELES STATE OF CALIFORNIA

DATE MARCH 26, 2025
SCALE 1" = 50'
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SHEET 5 OF 5