Appendix K

Fire Report

WILDFIRE MITIGATION AND FIRE CODE ANALYSIS REPORT

Village Christian School Campus Addition
Sun Valley, California
16 July 2026 (Revised 23 September 2026)

SGH Project 260857

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EXECUTIVE SUMMARY

Simpson Gumpertz & Heger Inc. (SGH) reviewed the entitlement-level documents for the phased addition to the Village Christian School campus at 8930 North Village Avenue in Sun Valley, California, and evaluated how the design incorporates the wildfire mitigation measures relevant to the project's discretionary entitlement and responds to the Los Angeles Fire Department (LAFD) recommendations dated 12 January 2026. The campus sits at the northwesterly base of the Verdugo Mountains, with brush-covered hillside abutting the rear of the site, the same wildland corridor in which the 2017 La Tuna Fire burned approximately 7,194 acres. The parcel is mapped within a Very High Fire Hazard Severity Zone, so wildfire exposure at this location is both significant and formally recognized.

Based on the documents reviewed, the entitlement-level design is capable of incorporating the applicable wildfire mitigation measures and responds to each of the LAFD recommendations of 12 January 2026 (Section 12, Matrix 1). On 5 May 2026, the LAFD Hydrant and Access Unit confirmed in writing that the Applicant has tentatively addressed all fire code items cited in that correspondence, conditionally approved the proposal, and directed that the confirmation be used by the Department of City Planning to progress the Conditional Use Permit process. LAFD characterized that review as preliminary (Section 8.1). Consistent with customary entitlement-stage practice, construction-level documentation is completed through dimensioned plans and written LAFD and Los Angeles Department of Building and Safety (LADBS) approvals at building permit plan check (Sections 7, 8, 12, and 13). Three matters are highlighted for coordination with LAFD and LADBS through building permit plan check:

- **Code edition.** The 2025 California codes and the City of Los Angeles 2026 amendments became effective 1 January 2026. The wildland-urban interface (WUI) provisions formerly provided in California Building Code (CBC) Chapter 7A and California Fire Code (CFC) Chapter 49 are now primarily in the 2025 California Wildland-Urban Interface Code (CWUIC), Title 24, Part 7. The permit documents will reference the currently adopted code applicable at each permit phase; the 2023 references in the proposal and the LAFD letter map to the 2025 provisions identified in this report (Section 6).

- **Fire hazard severity zone.** The campus is identified as a Very High Fire Hazard Severity Zone in a Local Responsibility Area by the LAFD letter and CAL FIRE mapping. The governing local WUI provisions therefore apply to new work, additions, and alterations, together with California Government Code §51182 defensible-space obligations.
- **Fire apparatus access.** The concept plans establish the required access framework, with dimensioned road widths and access reach shown in Figures 5 to 7. The gymnasium is approximately 35 ft in height, so the aerial apparatus access provisions apply to that building, and LAFD took no exception to the proposed configuration in its preliminary review. Dimensioned confirmation of the 150 ft access reach, dead-end geometry, and aerial access geometry is completed with LAFD at building permit plan check (Sections 8 and 10).

The entitlement design incorporates the principal applicable wildfire mitigation measures, including an ignition-resistant exterior palette, a managed and irrigated buffer with fire-smart planting extending 100 ft from each building (or to the property line, where closer), and a fire apparatus access framework responsive to the LAFD recommendations. The full 30 ft fuel modification zone lies within the property for each new or expanded building (Figure B-1). The building permit plan check items (final access dimensions, the CWUIC §608.2 determinations at internal campus drives, fire flow verification, the City landscape and fuel modification documentation, and WUI assembly details) are of the type customarily demonstrated at that stage. SGH identified no condition at the entitlement level that would preclude the Project from meeting the applicable wildfire requirements, subject to LAFD and LADBS approvals through the identified compliance paths.

SGH's recommendations are consolidated as ten priority actions, detailed in Section 17. As stated in Section 1, these are recommendations to the Project design team for carrying code-required work through permitting; they are not proposed mitigation measures and are not recommended as conditions of approval.

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Appendix A – Matrix 3 – LADBS Fire Hazard Severity Zone Checklist Compliance Tracking
Appendix B – Dimensioned Fuel Modification and Statutory Defensible Space Zones

Acronyms

AHJ	Authority Having Jurisdiction
APN	Assessor's Parcel Number
AMMR	Alternative Means and Methods Request
BOE	Bureau of Engineering
CAL FIRE	California Department of Forestry and Fire Protection
CBC	California Building Code (Title 24, Part 2)
CCR	California Code of Regulations
CEBC	California Existing Building Code (Title 24, Part 10)
CFC	California Fire Code (Title 24, Part 9)
CUP	Conditional Use Permit
CWUIC	California Wildland-Urban Interface Code (Title 24, Part 7)
FDC	Fire Department Connection
FHSZ	Fire Hazard Severity Zone
LADBS	Los Angeles Department of Building and Safety
LAFC	Los Angeles Fire Code (City amendments to the CFC)
LAFD	Los Angeles Fire Department
LAMC	Los Angeles Municipal Code
LRA	Local Responsibility Area
NFPA	National Fire Protection Association
PRC	California Public Resources Code
SFM	State Fire Marshal
SGH	Simpson Gumpertz & Heger Inc.
SRA	State Responsibility Area
UL	Underwriters Laboratory LLC
VHFHSZ	Very High Fire Hazard Severity Zone
WUI	Wildland-Urban Interface

1. INTRODUCTION

Simpson Gumpertz & Heger Inc. (SGH) was retained by Mailian & Associates, as agent for Village Christian School (the "Applicant"), to review the available entitlement-level plans and project information for the Village Christian School phased campus addition at 8930 North Village Avenue in Sun Valley, California (the "Project"), and to prepare this combined wildfire mitigation and fire code analysis report. The purpose of the report is to document, at the entitlement level, how the Project's design incorporates the wildfire mitigation measures relevant to its discretionary entitlement and responds to the recommendations of the Los Angeles Fire Department (LAFD) in its inter-departmental correspondence dated 12 January 2026.

This report addresses: (1) the regional wildfire hazard setting; (2) the fire hazard severity zone status of the site and the codes and standards applicable to the Project; (3) defensible space, building siting, and fuel modification; (4) fire apparatus access and water supply; (5) wildland-urban interface (WUI) exterior ignition-resistant construction; (6) alternative means of compliance; (7) ongoing operations and maintenance; and (8) an implementation roadmap. It includes two matrices: a conformance matrix cross-referencing each LAFD recommendation to the corresponding design feature, and a compliance matrix cross-referencing exterior envelope elements to the applicable ignition-resistant construction requirements (Sections 12 and 13, respectively).

This is an entitlement-level desktop review based on the documents made available to SGH. It does not include a site visit, field verification of plan dimensions, destructive investigation, wildfire spread or evacuation modeling, fire flow testing, fire hydrant or water supply system design, product compliance review, or structural or civil engineering calculations. Active wildfire defense systems (for example, exterior spray defense systems, on-site fire water storage and fire pumps, and energy storage system protection) are outside the scope of this entitlement review and are not evaluated here. Construction-level compliance documentation and authority having jurisdiction (AHJ) approvals are completed at building permit plan check, as noted throughout.

SGH's review applied the codes and standards identified in Section 6.2, including the 2025 California Wildland-Urban Interface Code (CWUIC), as amended by the City of Los Angeles, the 2025 California Building Code (CBC) and California Fire Code (CFC), California Government Code §51182, and applicable LAFD/Los Angeles Department of Building and Safety (LADBS) guidance, together with recognized WUI practices and SGH's professional experience in fire protection and life safety engineering. Los Angeles County fuel modification guidance was considered as a technical reference and is not treated as governing within City jurisdiction.

The recommendations in Sections 15 and 17 are professional recommendations to the Project design team for carrying code-required work through the permitting process. They are not offered as mitigation measures under the California Environmental Quality Act and are not recommended as conditions of approval. Each corresponds to a requirement that is independently enforceable by LADBS and LAFD at building permit issuance under the 2025 California codes as amended by the City of Los Angeles. Detailed compliance demonstrations, including dimensioned plans, calculations, tested or listed assemblies, and agency confirmations, are prepared on construction documents and reviewed at building permit plan check.

2. QUALIFICATIONS

This report was prepared under the direction of Nathan B. Wittasek, P.E., CFEI, CASp, a Principal at SGH and a licensed Fire Protection Engineer in the State of California (License No. 1534). The opinions expressed are based on the materials reviewed, the applicable codes and standards identified in Section 6.2, and professional experience in fire protection and life safety engineering.

3. DOCUMENTS REVIEWED

SGH reviewed the following materials:

- Architectural set, "CUP Application Resubmittal #6," Franco & Associates Inc., dated 22 September 2026, with the architectural sheets dated 15 July 2026 and Sheet A0.0 revised (including Sheets A0.11 "Partial Site Plan," A0.12 "Traffic Within Master Site Plan/Fire Department Notes," exterior elevations, roof plans, and material/finish Sheets A6.00–A6.02)
- Civil grading plan C24.0891 (plotted 4 and 5 August 2026)
- Landscape CUP Submittal #3, including Sheet L-1 "Preliminary Landscape Plan" and Sheet L-2 "Planting Palette and Planting Notes" (dated 22 September 2026)
- Tree Report and Tree Location/Impact Exhibits (City of Los Angeles Protected Tree Report, dated 31 October 2025)
- LAFD inter-departmental correspondence to the Department of City Planning, dated 12 January 2026, with the Applicant's point-by-point responses (response set dated 21 April 2026; earlier draft response set dated 12 February 2026)
- Email from Jerry Kao, Fire Inspector II, LAFD Fire Development Services Section, Hydrant and Access Unit, dated 5 May 2026, providing written confirmation following the Unit's 4 May 2026 review meeting with the Applicant
- Bureau of Engineering (BOE) report and the Applicant's responses
- Project Narrative, Mailian & Associates
- Biologist's Statement of Biological Resources; and Noise Impact Assessment (reviewed for context only)

4. PROJECT AND SITE DESCRIPTION

The Project is a phased addition to the existing Village Christian School (grades K–12) campus, which occupies an approximately 28 acre (1,220,718 sq ft) parcel (APN 2404001019 per City ZIMAS) zoned A2-1-K within the Sun Valley-La Tuna Canyon Community Plan Area and the San Gabriel/Verdugo Mountains Specific Plan. The entitlement requires a Conditional Use Permit under Los Angeles Municipal Code (LAMC) §13.B.2.3 and Project Permit Compliance under LAMC §11.5.7.

The present scope of work comprises the following (Figure 1, red highlight):

- A new gymnasium of approximately 18,826 gsf (with an athletic training program)
- A new performing arts annex building of approximately 4,023 gsf

The entitlement also provides for the following future additions, to be designed and permitted separately (Figure 1, blue highlight):

- An expansion and remodel of the administration building (offices, chapel, and library) to a total area of approximately 13,988 gsf.
- A second-story addition to and remodel of the existing Building 10 elementary classroom building to a total area of approximately 11,310 gsf.

The proposed buildings include educational (Group E), assembly (Groups A-3 and A-4, including the gymnasium), business (Group B), and storage (Group S-2) occupancies. Construction is proposed in phases: Phase I (gymnasium and annex) is the present scope of work; the administration building and the Building 10 second-story addition are future phases accommodated by the entitlement, to be designed and permitted separately. In this report, the term tenant improvements refers to the administration building expansion and remodel and to the Building 10 second-story addition and remodel.

The campus is bounded on the west by Village Avenue and is served internally by the existing red-curbed fire lane along Wildwood Avenue. The southern and eastern margins abut brush-covered sloped open space, while the La Tuna Canyon Lateral runs near the northern edge. These conditions create a WUI exposure along the rear of the site. The Tree Report identifies protected coast live oak (*Quercus agrifolia*), Mexican elderberry (*Sambucus mexicana*), and

California sycamore (*Platanus racemosa)* specimens proposed for preservation; vegetation management must be coordinated with those protections. Protected tree locations are reflected in Figure 2.

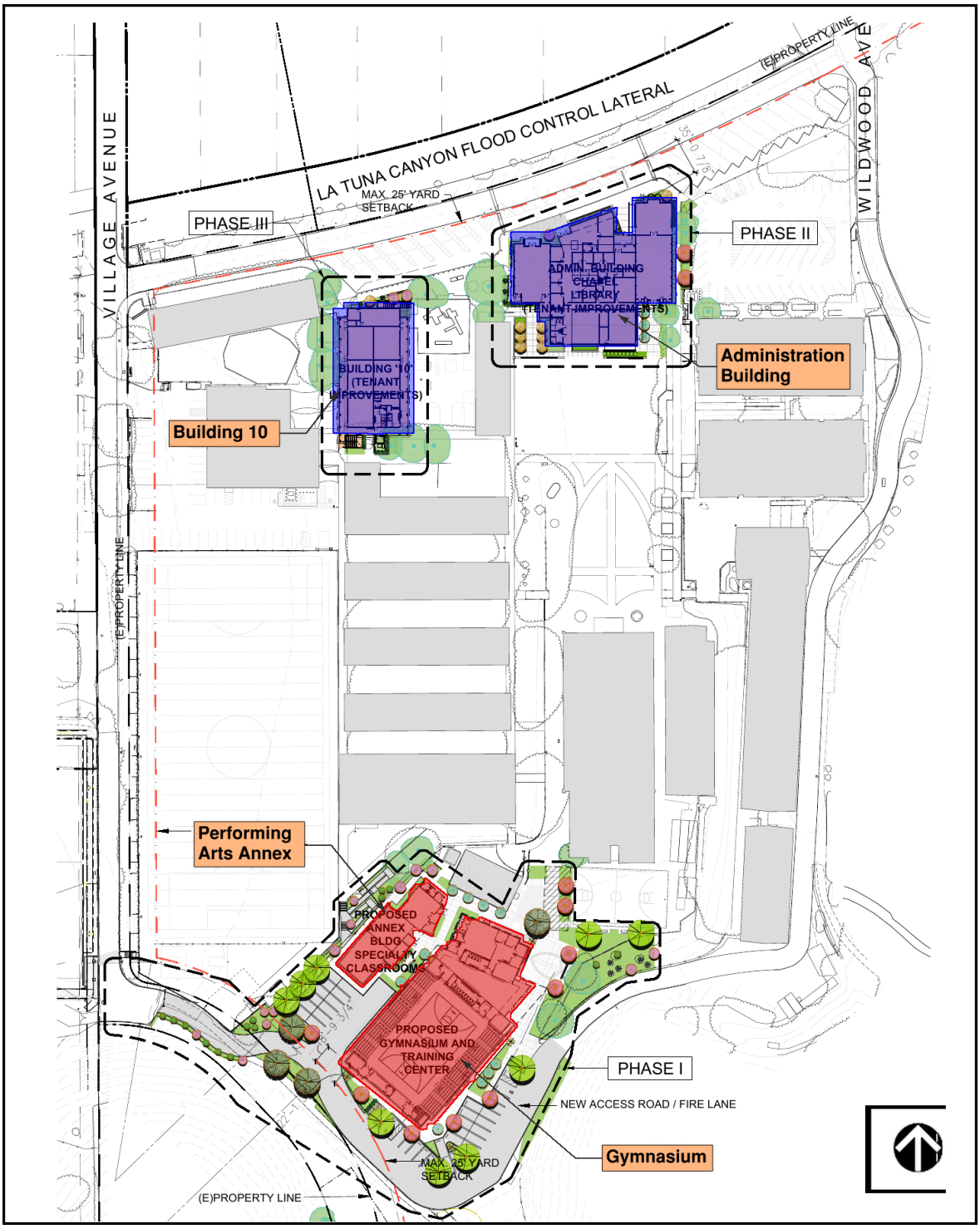

Figure 1 – Scope of Work Site Plan (Sheet A0.0)

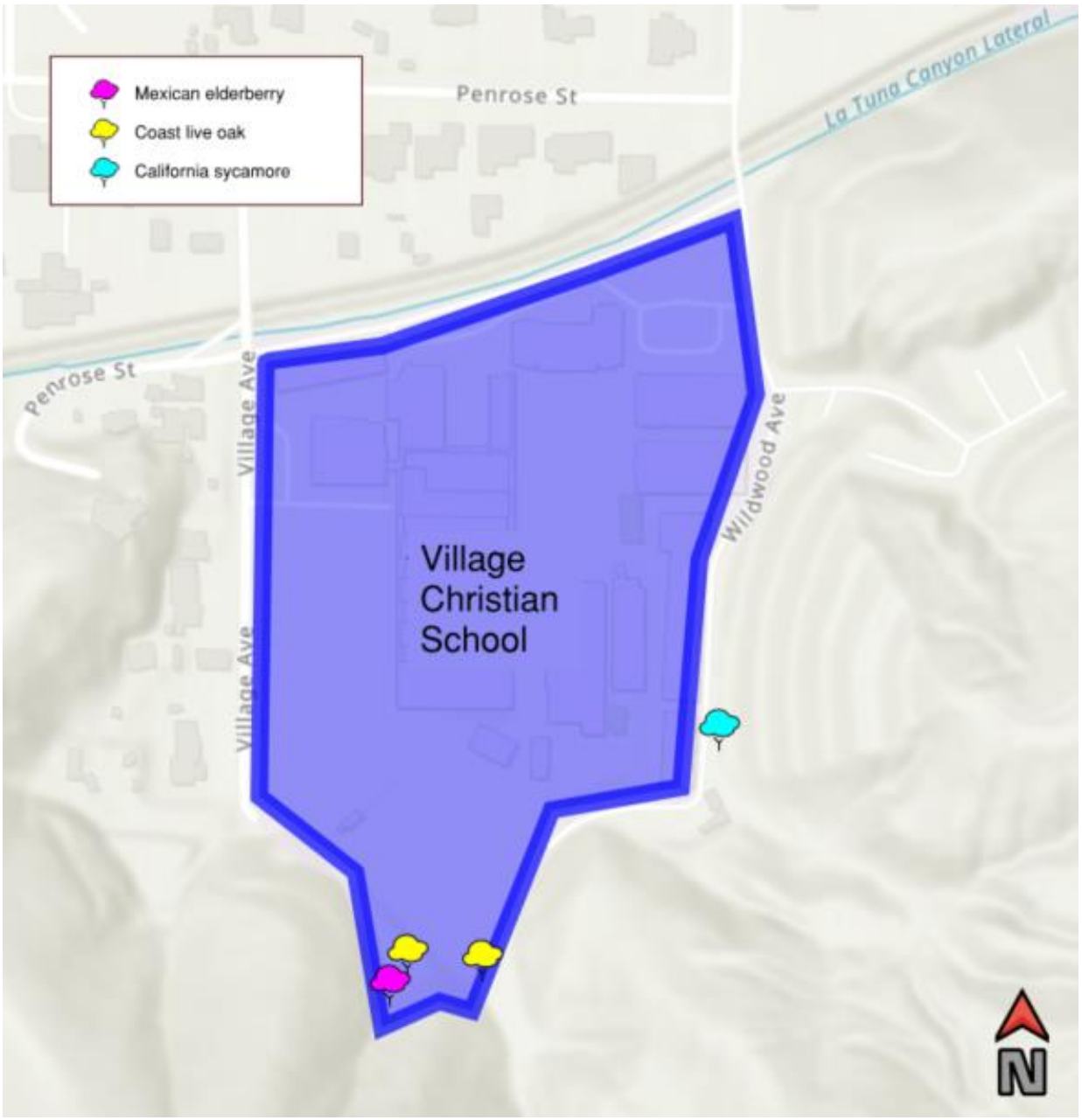

Figure 2 – Site Map with Protected Tree Locations

(Source: ESRI/ArcGIS basemap; protected tree locations per Protected Tree Report, 31 Oct. 2025)

5. WILDFIRE HAZARD SETTING

This section provides qualitative context for the wildfire mitigation measures evaluated in this report. It is not a wildfire spread or evacuation model, which is outside the scope of this review.

5.1 Regional Setting and Fire History

The campus is located at the northwesterly base of the Verdugo Mountains, within the San Gabriel/Verdugo Mountains Specific Plan area and adjacent to the La Tuna Canyon corridor. The surrounding development pattern is characteristic of a WUI setting. In September 2017, the La Tuna Fire burned approximately 7,194 acres in the Verdugo Mountains and threatened nearby communities (Figure 3). This fire history is relevant context but does not substitute for site-specific fire behavior analysis.

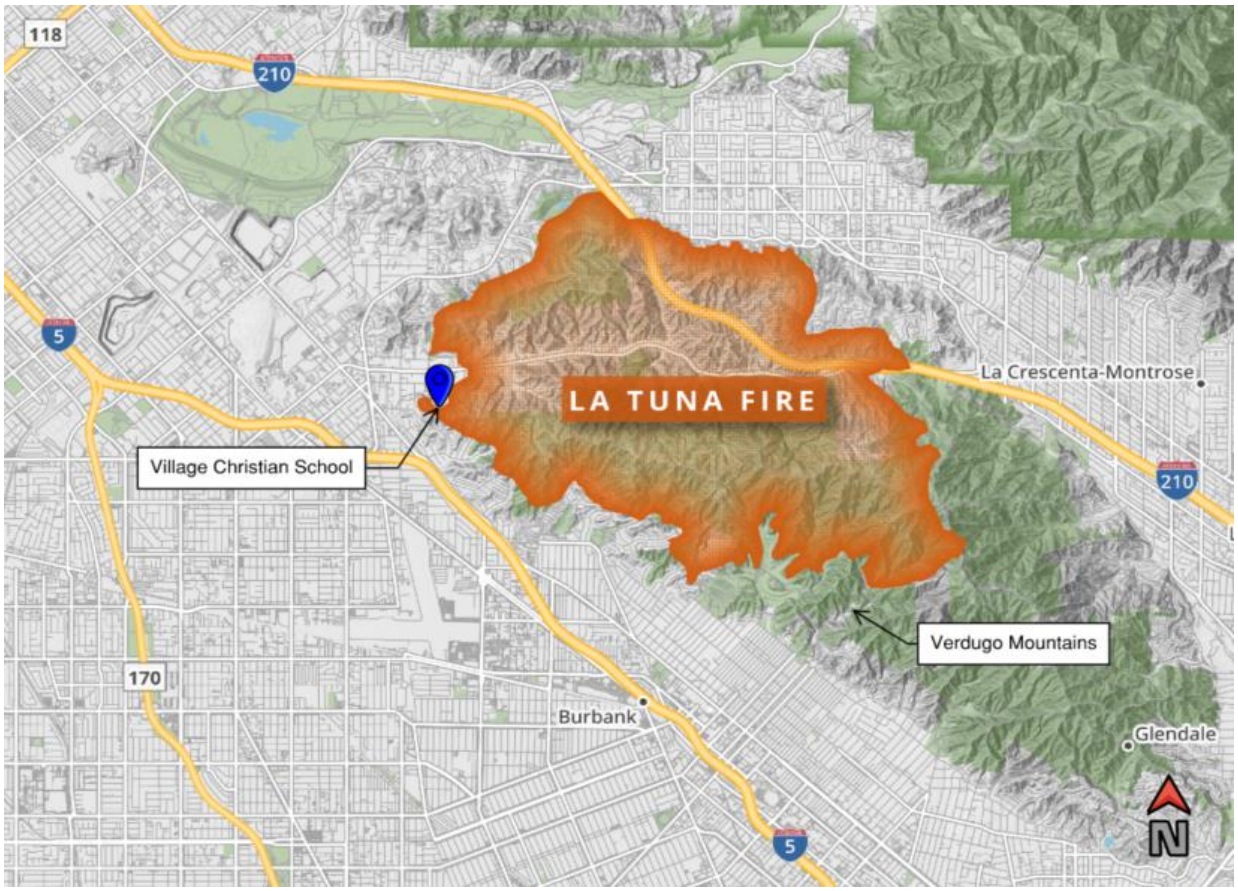

Figure 3 – La Tuna Fire Burn Zone

(Source: 2017 La Tuna Fire perimeter, Wikimedia Commons, public domain; base data from CAL FIRE, USGS, USFS, NPS, U.S. Census Bureau, and OpenStreetMap)

5.2 Fuels, Terrain, and Wind Exposure

The adjacent slopes contain chaparral and coastal sage scrub fuel complexes that can support rapid, high-intensity shrubland fire with long flame lengths when dry, particularly on slopes. Portions of the slope terrain have also converted to non-native annual grasses, which cure earlier in the season and can shift fire behavior toward more frequent, faster-moving fires.

Severe regional fire weather is associated with strong, dry Santa Ana winds from the north and low humidity. Under these conditions, wind-borne embers can travel ahead of the fire front and accumulate at roofs, vents, wall intersections, courtyards, and other receptive locations. The campus's position at the base of the Verdugo slopes increases exposure to both slope-driven fire behavior and ember transport.

5.3 Project-Specific Wildfire Vulnerabilities

Based on the hazard setting and the documents reviewed, the most significant project-specific wildfire vulnerabilities are:

- **Rear brush interface.** The southern and eastern margins of the campus abut undeveloped brush, creating a fuel pathway toward the campus that must be interrupted by defensible space, managed vegetation, and ignition-resistant construction.
- **Slopes and drainage corridor**. Sloped terrain can increase flame length and radiant exposure. The civil plans state that graded slopes will be planted and irrigated; those areas must be maintained to support the defensible-space strategy.
- **Ember-prone building features.** Vents, eaves and soffits, roof edges, gutters, and any clear-to-sky openings or recessed courtyards are well-documented ember-entry and ember-accumulation points; these are addressed by the ignition-resistant construction requirements (Section 9 and 13).
- **Fire apparatus access.** The concept plans establish the required fire access framework, with dimensioned road widths and access reach (illustrated in Figures 5 through 7 below). Final confirmation of the 150 ft access reach, dead-end roadway geometry, and aerial apparatus access requirements for the gymnasium (approximately 35 ft in height) will be completed during LAFD plan check. Applicable compliance pathways are identified in Sections 8 and 10. Water supply provisions, including hydrant placement and fire flow requirements, will also be evaluated and finalized during subsequent design and plan review phases.

- **Phased construction.** Multi-year phasing creates interim conditions in which required defensible space and managed vegetation must be established and maintained around each completed phase while adjacent areas remain under construction.
- **Protected trees.** Fuel modification criteria must be reconciled with preservation requirements for the four protected trees identified in the Tree Report (Section 7).

5.4 Outlook

Wildfire exposure should be treated as persistent over the life of the campus. The current Very High Fire Hazard Severity Zone (VHFHSZ) designation (Figure 4) establishes the regulatory basis for this review.

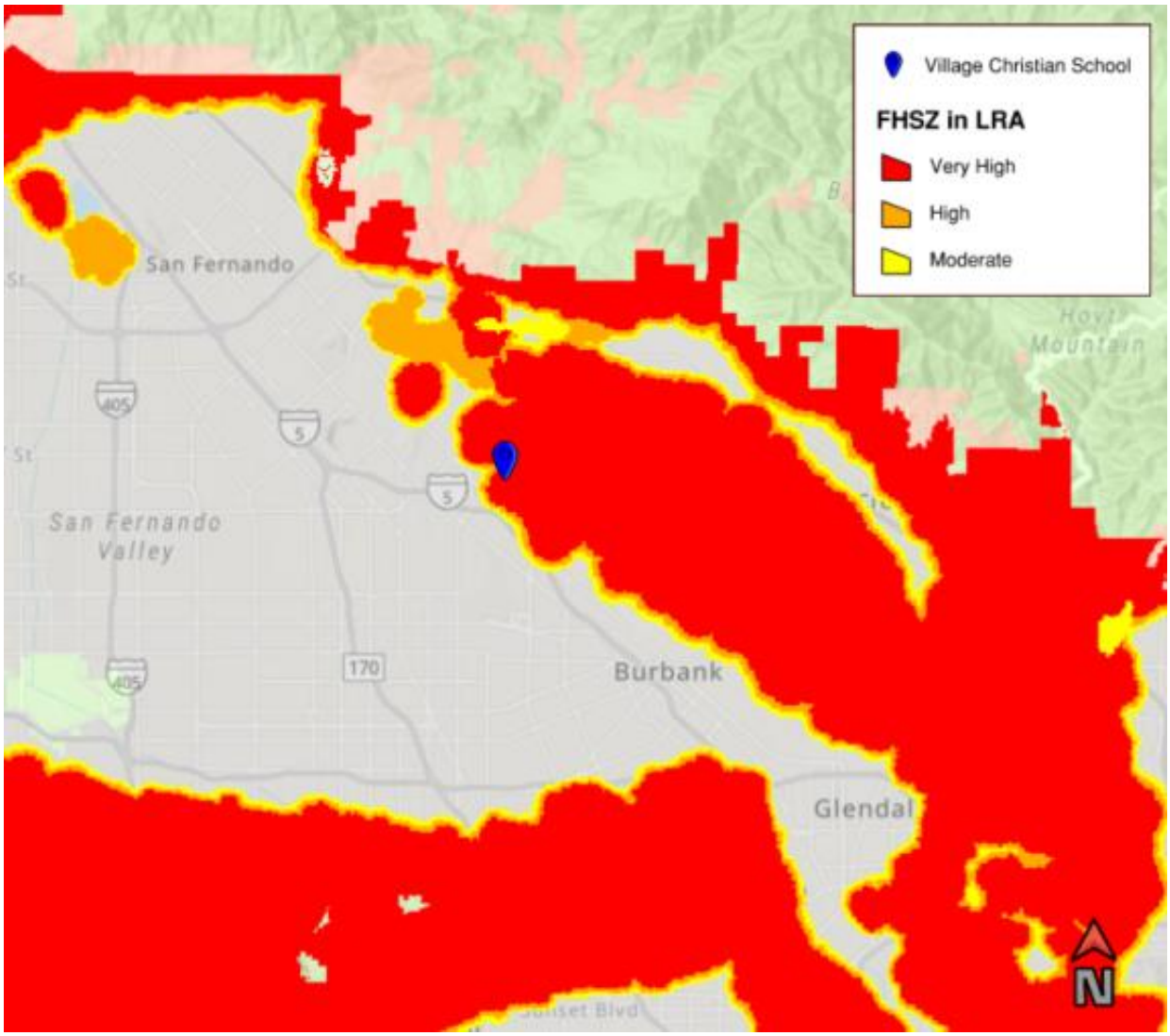

Figure 4 – CAL FIRE Very High Fire Hazard Severity Zone Mapping

(Source: CAL FIRE Fire Hazard Severity Zones, open data)

6. FIRE HAZARD SEVERITY ZONE STATUS AND APPLICABLE CODES

6.1 Fire Hazard Severity Zone Status

The Project parcel is identified as a VHFHSZ in a Local Responsibility Area (LRA) by CAL FIRE mapping and the LAFD's 12 January 2026 correspondence. The LAFD letter references 2023 Los Angeles Fire Code (LAFC) §4911; however, code interpretation and compliance determinations for each permit phase should be based on the LAFC edition in effect at the time of permit review. This report treats the City ZIMAS parcel (APN 2404001019) as controlling for the entitlement and Fire Hazard Severity Zone (FHSZ) determination; the County Assessor parcel locator returns APN 2404001006 for the same address. The VHFHSZ requirements apply under either number, and the architectural sheets use the ZIMAS APN (Sheet A0.0; [R1]).

FHSZs are designated under California Public Resources Code §§4201–4204 for State Responsibility Areas (SRAs) and California Government Code §§51175–51189 for LRAs and are referenced by 2025 CWUIC §302. The site setting is consistent with the mapped classification. This report cites the City ZIMAS parcel profile as the governing FHSZ record for the Conditional Use Permit (CUP) ([R1]).

Consequences of VHFHSZ Designation

Because the parcel is within a VHFHSZ (LRA), the wildfire-related provisions apply as mandatory requirements rather than discretionary measures, including:

- Ignition-resistant construction for new buildings, additions, and alterations under the 2025 CWUIC as amended by the City of Los Angeles (Section 9 and Section 13 Matrix 2)
- Defensible space within 100 ft of structures, or to the property line, under California Government Code §51182 (Section 7)
- VHFHSZ site planning and vegetation provisions, including the 30 ft building setback or approved alternative features under 2025 CWUIC §608.2 and the 30 ft fuel modification information required under LADBS FHSZ Supplemental Checklist (PC/STR/Corr.Lst.116, rev. 23 December 2025) (Section 7)
- Fire apparatus access and water supply provisions applicable to the Project and required by LAFD (Section 8)

These code requirements are independent of, and in addition to, any conditions of approval the City imposes through the Conditional Use Permit and Project Permit Compliance.

6.2 Applicable Codes and Standards: Code Edition

The applicable code edition is determined by the permit application date for each phase, subject to transition provisions and AHJ interpretation. The 2025 California Building Standards Code and the City of Los Angeles 2026 amendments became effective 1 January 2026. Permit applications submitted under this cycle should use the 2025 CWUIC, CBC, and CFC as locally amended. The LAFD letter's 2023 code citations remain useful as issue references, but the permit documents should identify the corresponding current provisions. The 2025 code requirements corresponding to the superseded codes are identified below; the conformance matrix (Matrix 1, Section 12) similarly references current 2025 code.

6.3 Applicable Codes and Standards: Relocation of WUI Provisions

A significant 2025 cycle change affects this Project. In the 2025 California codes, the WUI construction and protection provisions have been relocated into a new standalone code:

- **2025 CBC Chapter 7A** was relocated; 2025 CBC §101.4.8 directs users to Part 7 CWUIC
- **2025 CFC Chapter 49** was relocated; 2025 CFC §102.13 directs users to Part 7 CWUIC

Accordingly, the operative WUI construction and vegetation provisions are primarily in the 2025 CWUIC, as amended by LAMC Chapter V, Article 7.1. General building and fire service requirements remain in the CBC, CFC, and local amendments.

The codes and standards applied in this report are provided in Table 1.

Table 1 – Codes and Standards

Code / Standard	Application
2025 California Wildland-Urban Interface Code (CWUIC), Title 24 Part 7	Operative WUI requirements: WUI/FHSZ designation (Ch. 3), access and water supply (Ch. 4), ignition-resistant construction (Ch. 5), and defensible space, vegetation, greenbelts, and building siting/setbacks (Ch. 6), LADBS Fire Severity Hazard Zone Supplemental Checklist (LADBS implementation tool for the CWUIC and applicable City requirements)

Code / Standard	Application
2025 California Building Code (CBC), Title 24 Part 2	General building requirements; CBC §101.4.8 directs to CWUIC Part 7; glazing (Ch. 24); alternative materials and methods (§104.2.3)
2025 California Fire Code (CFC), Title 24 Part 9	Fire service features (Ch. 5: access §503, premises identification §505, key boxes §506, water supply §507, emergency responder communication coverage §510); fire flow and hydrants (Appendices B/BB and C/CC where applicable); fire apparatus access roads (Appendix D where applicable); alternatives (§104.2.3)
2025 California Existing Building Code (CEBC), Title 24 Part 10	Additions to and alterations of the existing Building 10 and administration building (Ch. 7, Ch. 11)
California Government Code §51182; Public Resources Code §4291	Statutory defensible space for VHFHSZ LRA and SRA parcels, respectively; Government Code §51182 is the direct statute for this LRA site
LA County Fire Code (Title 32) §4908.1 and LA County Fuel Modification Plan Guidelines	Nonbinding technical reference only if accepted by LADBS/LAFD; not the governing City framework
State Minimum Fire Safe Regulations, 14 CCR §1270 et seq.	Access and water supply baseline where incorporated and applicable; confirm local implementation with LAFD
Los Angeles Municipal Code (LAMC); City of Los Angeles Building and Fire Code amendments	Local WUI amendments (LAMC Ch. V, Art. 7.1), fire code amendments, entitlement provisions, and applicable Public Works standards

7. DEFENSIBLE SPACE, BUILDING SITING, AND FUEL MODIFICATION

7.1 Applicable Framework

Because the campus adjoins brush-covered slopes, defensible space, building siting, and vegetation management are central wildfire controls. The governing City/State requirements and optional technical references should be distinguished.

- **Fuel modification and management.** (City of Los Angeles / 2025 CWUIC §604). The LADBS FHSZ Supplemental Checklist requires new work, additions, and alterations in High and Very High FHSZs to comply with the 2025 CWUIC as locally amended. Site and landscape plans are to show 30 ft fuel modification zones, existing and proposed vegetation and irrigation, plant legends, and ground cover. The Los Angeles County Fuel Modification Plan organizes vegetation treatment into Zone 1, Zone 2, and Zone 3. These County zone designations are cited here only as a technical reference; are distinct from the State defensible space distance bands of 0 to 5 ft (Zone 1), 5 to 30 ft (Zone 2), and 30 to 100 ft (Zone 3) under California Public Resources Code (PRC) §4291; and do not govern within the City of Los Angeles.

- **Defensible space.** (Government Code §51182 / 2025 CWUIC§608.2). For this VHFHSZ parcel in an LRA, the owner must maintain defensible space within 100 ft of structures or to the property line in accordance with the LAFD letter recommendations and Government Code §51182. Note that Government Code §51182 defensible space applies to VHFHSZ in an LRA (and to SRA), not to Moderate or High FHSZ in an LRA; this parcel is VHFHSZ-LRA (Figure 4), so the obligation applies.

- **Road setbacks.** The 2025 CWUIC §608.2 also requires a 30 ft building setback from property lines and road centerlines within the VHFHSZ unless the code official approves alternative features that reduce structure-to-structure ignition. The commonly used 0 to 5 ft, 5 to 30 ft, and 30 to 100 ft zone concept is useful for design and operations; these distance bands reflect State defensible-space practice under PRC §4291 and are distinct from the Los Angeles County Fuel Modification Plan Zone 1/2/3 designations; however, statewide Zone 0 regulations remain under development as of July 2026 and are not yet an enforceable requirement.

- **Building setbacks.** Building setbacks per §608.2 are shown in Figures 5, 6, and 7. No proposed building or tenant improvement is within 30 ft of a property line or of a public road. The conditions shown in Figures 5, 6, and 7 (yellow highlight) arise where buildings sit within 30 ft of the centerline of internal campus fire apparatus access drives. Whether those private, campus-internal drives constitute a road for purposes of 2025 CWUIC §608.2 is a determination for the code official: 14 CCR §1270.01 defines a road as a vehicular pathway serving more than four residential units or an industrial or commercial occupancy, and a driveway as a route serving not more than four residential units, and campus-internal circulation meets neither definition on its face. Where the code official applies the road centerline criterion to those drives, a setback

reduction under §608.2.1, supported by the site constraints that the section contemplates and by alternative features such as a 5 ft noncombustible buffer, provides the compliance path. Setback requirements and any reduction shall be confirmed with LADBS and LAFD at plan check.

- Fuel modification guidelines. Los Angeles County fuel modification guidance may be used as a technical reference if LADBS/LAFD accepts it, but it does not govern a project within the City of Los Angeles. LADBS FHSZ checklist guidance should be referenced as the governing document for defensible space landscaping.

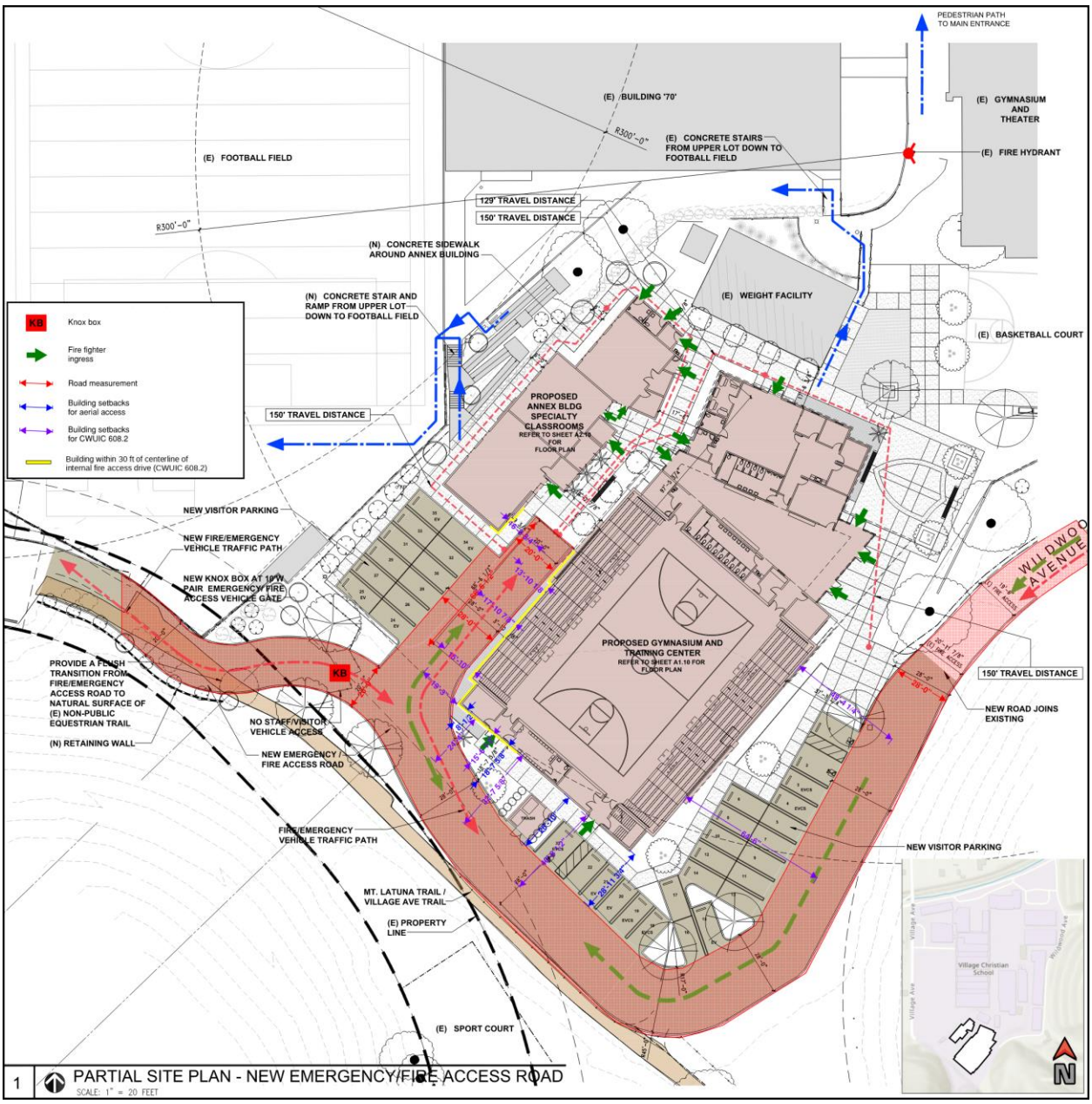

Figure 5 – Gymnasium and Annex: Fire Apparatus Access Geometry (Sheet A0.11)

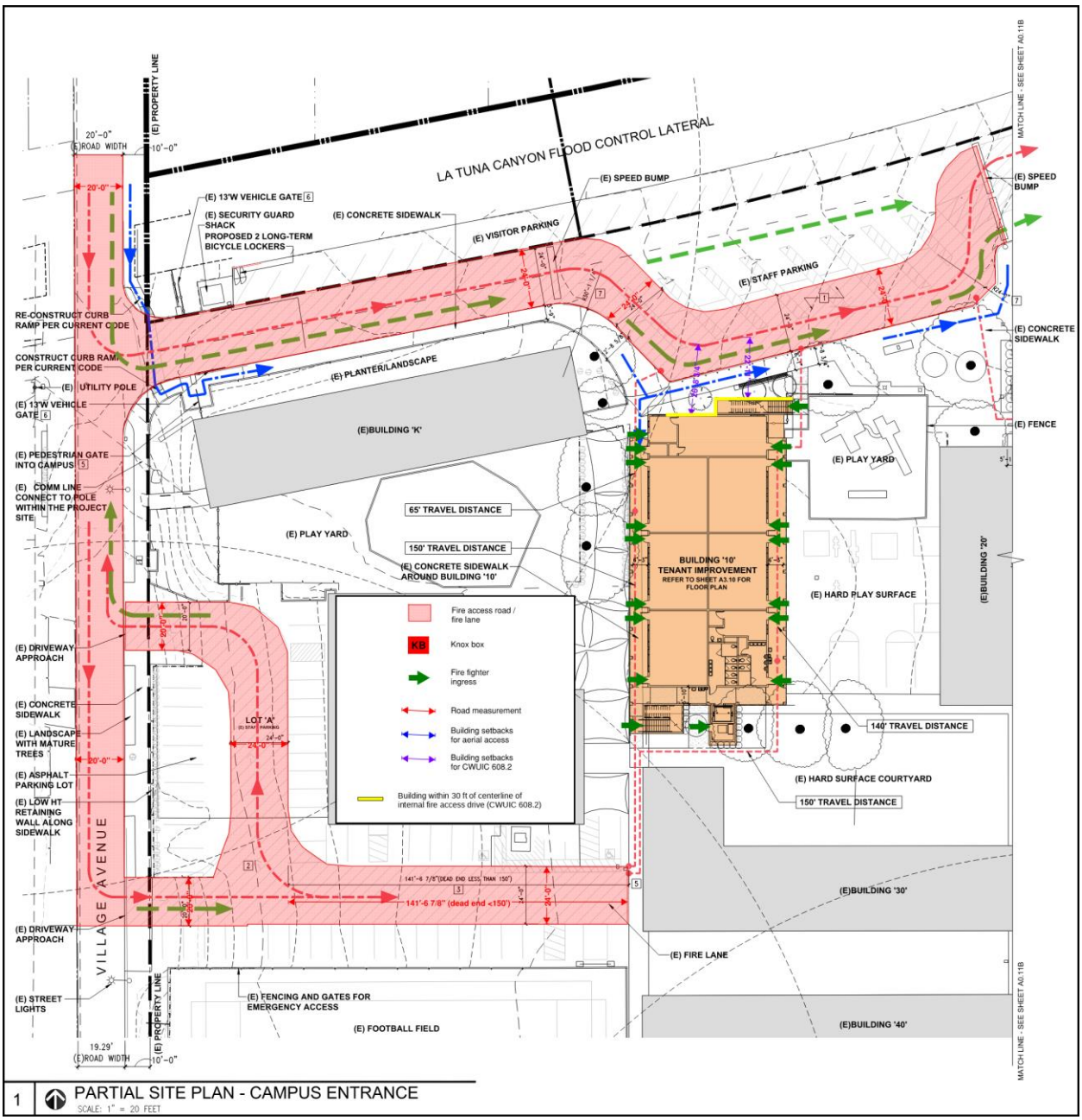

Figure 6 – Building 10: Fire Apparatus Access Geometry (Sheet A0.11A)

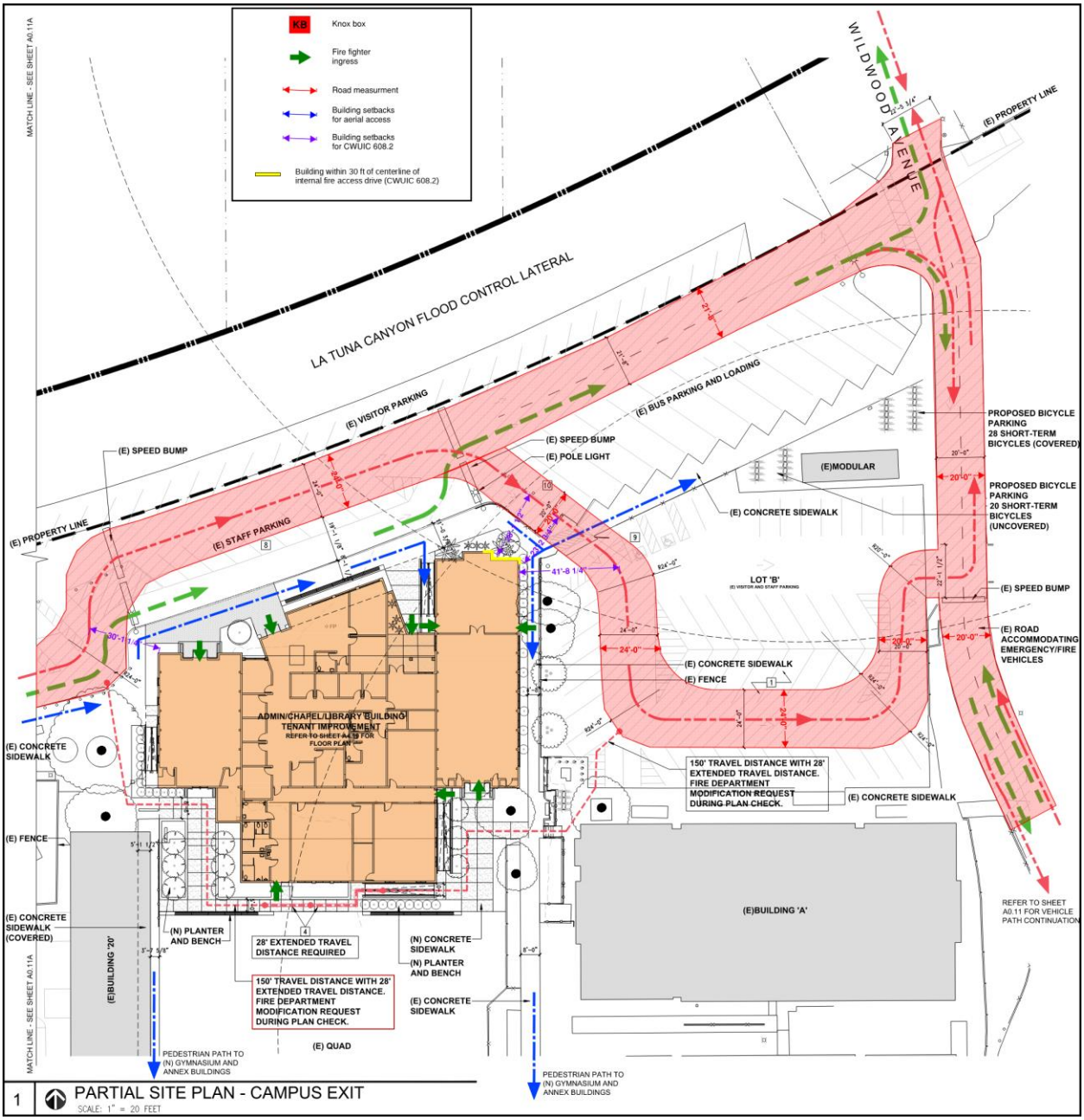

Figure 7 – Administration Building: Fire Apparatus Access Geometry (Sheet A0.11B)

7.2 Evaluation of the Proposed Approach

The landscape documents (Sheet L-2) include a 100 ft irrigated and managed buffer note, fire-smart plant selection (including California buckwheat [*Eriogonum fasciculatum*], coyote brush [*Baccharis pilularis*], and dwarf bottlebrush [*Callistemon 'Little John'*]), slope planting, and ongoing brush maintenance. The civil plan states that graded slopes will be planted and irrigated. These features are consistent with the LAFD recommendation. Sheet L-1 delineates the

30 ft and 100 ft fuel modification zones at the gymnasium, and the dimensioned 2025 CWUIC §608.2 setback conditions are shown in Figures 5 to 7. The City landscape and fuel modification details are required with the building permit submittal.

In SGH's opinion, the landscape concept is capable of compliance; the following will be completed at building permit plan check:

- **City jurisdiction landscape/fuel modification plan**. A coordinated plan will be prepared for LADBS/LAFD acceptance, aligned with 2025 CWUIC §106.3, showing the 30 ft fuel modification zone, 100 ft statutory defensible space limits, topography, grading, irrigation, plant spacing, ground cover, maintenance responsibilities, and phasing; the Los Angeles County Fuel Modification Plan serves only as a supplemental technical reference if accepted by the City. Figure B-1 (Appendix B) demonstrates the 30 ft zone and the 100 ft defensible space limit around each new or expanded building on the current landscape plan (Sheet L-1), with the property line plotted 25 ft outboard of the maximum yard setback line on Sheet A0.0. The full 30 ft zone lies within the property for each new or expanded building (the nearest property line is approximately 38 ft from the gymnasium), and the 100 ft limit ends at the property line under Government Code §51182(a)(1)(A), except as subparagraph (B) of that section provides.
- **Building siting/setback.** A dimensioned 2025 CWUIC §608.2 analysis is provided for each new or expanded building; where a 30 ft setback is not available, alternative features or setback reductions per §608.2.1 will be identified for code official approval during plan check.
- **Protected tree coordination.** Fuel modification criteria will be reconciled with the protected tree report and the City's tree preservation process; limbing and removal decisions will be made with arborist and AHJ direction for retained specimens and protected species (coast live oak, Mexican elderberry and California sycamore).
- **Interim phasing**. Required defensible space will be established and maintained around each completed phase and along active construction interfaces.

8. FIRE APPARATUS ACCESS AND WATER SUPPLY

8.1 Fire Apparatus Access General

Fire apparatus access is governed by 2025 CFC §503, applicable local amendments and LAFD requirements, and 2025 CFC Appendix D where adopted or invoked by the AHJ. The current plans, shown in Figures 5, 6, and 7, are entitlement-level plans; final LAFD Hydrant and Access Unit clearance is issued at building permit plan check. LAFD's Hydrant and Access Unit met with the Applicant on 4 May 2026 to review the inter-departmental correspondence and the architectural plans as they relate to fire code hydrant and access requirements. By email dated 5 May 2026, the Unit confirmed that the Applicant has tentatively addressed all fire code items cited in that correspondence, and that the Unit conditionally approves the proposal for purposes of progressing the CUP process. LAFD identified that one or more additional fire hydrants may be required to satisfy the 300 ft criterion, characterized the review as preliminary, and reserved identification of additional requirements later in the review process. Key criteria and current status are:

- **Width.** The general minimum is 20 ft under 2025 CFC §503.2.1. Greater widths may apply at hydrants and for aerial access. The LAFD letter requires 28 ft for the identified aerial/hydrant conditions. Figures 5, 6, and 7 demonstrate dimensioned road widths for the proposed buildings and tenant improvements. The north fire lanes at the administration building and Building 10 overlap existing staff parking (Figures 6 and 7). Both buildings are future phases and are not part of the present scope of work; no parking modification is proposed under the current construction scope. When those phases proceed to permit, the required clear width will be maintained through parking modifications or another LAFD-accepted approach, confirmed with LAFD at plan check.
- **Vertical clearance.** CFC §503.2.1 requires 13 ft-6 in. unobstructed; the LAFD letter requests 14 ft. A general clear to sky note is not a substitute for dimensioned verification at gates, canopies, trees, utilities, and other obstructions.
- **Grade.** The LAFD letter limits the access road grade to 10%. The Applicant's 21 April 2026 response commits to revising the grading plan (Civil Plan C24.0891, plotted 4 and 5 August 2026) for a road slope of 10% or less, and Sheet L-1 notes a 10% maximum at the emergency vehicle access lane; LAFD approves the final civil plan at building permit plan check.
- **Dead ends.** Final dead-end lengths are demonstrated on the reviewed sheets; all dead-end lengths are within allowable dimensions per the applicable City criterion (LAFC §57.503.1.5).

- **150 ft access reach.** Figures 5, 6, and 7 demonstrate dimensioned access reach for the proposed buildings and tenant improvements. At the administration building, which is a future phase, the travel distance from the approved access road to the most remote portion of the building exceeds the 150 ft limit by approximately 28 ft (Figure 7). SGH understands the Sheet A0.0 sprinkler note, which states that the tenant improvement project will require the buildings to be fully sprinklered, to include the administration building. Where that building is equipped throughout with an approved automatic sprinkler system, 2025 CFC §503.1.1, Exception 1.1, authorizes the fire code official to increase the 150 ft dimension, subject to any City amendment. LAFD approval of that condition is obtained at the permit for that phase.

- **Knox boxes, gates, signage, and marking.** The notes (Sheet A0.12) address Knox boxes, fire lane marking, red curbs, and gate testing requirements. Final locations, hardware, and clear widths are required on the construction documents, and LAFD completes acceptance testing before occupancy. Fire lane marking is enforceable under California Vehicle Code §22500.1.

- **School-specific access.** Locked gate and safe dispersal area provisions will be confirmed with the egress design and LAFD. Under 2025 CFC §503.5.2, a fenced and gated school campus may use locked gates only where safe-dispersal areas sized at 3 sq ft per occupant and located not less than 50 ft from the buildings are provided between the school and the fence; reliance on this allowance requires demonstration of occupant load, dispersal area sizing, gate hardware, and gate operation at plan check.

8.2 Aerial Fire Apparatus Access Gymnasium

Aerial apparatus access is the principal fire apparatus access item for the gymnasium. Where the vertical distance from grade plane to the highest roof surface exceeds 30 ft, 2025 CFC Appendix D §§D105.2 to D105.3 require an aerial access road at least 26 ft wide, located 15 to 30 ft from and parallel to one entire side of the building, where Appendix D applies. The LAFD letter specifies a 28 ft City criterion in place of the 26 ft requirement. The Applicant reports the gymnasium at approximately 35 ft in height; the aerial apparatus access provisions therefore apply to that building.

The Applicant's 21 April 2026 responses indicated that the proposed Building 10 second-story addition would also exceed 30 ft. The elevations were subsequently revised, and the current drawing set supersedes that indication. Under 2025 CFC Appendix D, §D105.1, the highest roof surface is measured to the eave of a pitched roof, the intersection of the roof to the exterior wall, or the top of parapet walls, whichever is greater. Sheet A3.20 (dated 15 July 2026) shows Building 10 at an overall height of 29 ft-0 in., with the greatest top-of-parapet dimension at

29 ft-6 in. on the north elevation (Figure 10), and the building table on Sheet A0.0 lists the same 29 ft-6 in. height. The vertical distance from grade plane to the highest roof surface therefore does not exceed 30 ft, and the aerial apparatus access provisions of 2025 CFC Appendix D, §D105 are not triggered for Building 10. Building 10 is a future phase of the entitlement; because the drawings note the adjoining finished grade to be verified in field, the height is confirmed against the grade plane at the permit for that phase. The remaining proposed buildings and tenant improvements are reported at less than 30 ft. Figures 8 to 11 demonstrate the current proposed elevations; final heights of these buildings are confirmed on the building permit documents.

- **New gymnasium (approximately 35 ft, Figure 8).** Sheet A0.11 shows a 28 ft widening along the southwest side of the building, but the plan does not demonstrate that the qualifying aerial road is 15 to 30 ft from that entire side of the building (2025 CFC Appendix D, §D105.3, Figure 5). The Applicant's 21 April 2026 response set identified this condition to LAFD, and the LAFD Hydrant and Access Unit took no exception to the proposed 28 ft roadway configuration in its preliminary review (Section 8.1). Final confirmation of the configuration, whether as reviewed or through a fire apparatus access modification under 2025 CFC §503.2.2, is completed with the Hydrant and Access Unit at building permit plan check.

If the Hydrant and Access Unit requires a change to the reviewed configuration at building permit plan check, the following paths are available. Their identification does not commit the Project to a particular approach:

- Obtain LAFD approval of an Alternative Means and Methods Request (AMMR) (2025 CBC §104.2.3; 2025 CFC §104.2.3) or access modification (2025 CFC §503.2.2) supported by a project-specific equivalency analysis;
- Revise the building height so aerial access is not triggered, if feasible; or
- Reconfigure the access, parking, and queuing plan to provide compliant aerial access.

SGH does not assume that sprinklers, standpipes, roof access, or ground ladders will be accepted as equivalent measures satisfying the code intent; these may be candidate compensating measures only after the baseline code-required systems are identified. The selected path should be confirmed in writing with LAFD before finalizing building height, parking, and circulation.

Figure 8 – Gymnasium: Proposed Elevations (Sheet A1.20)

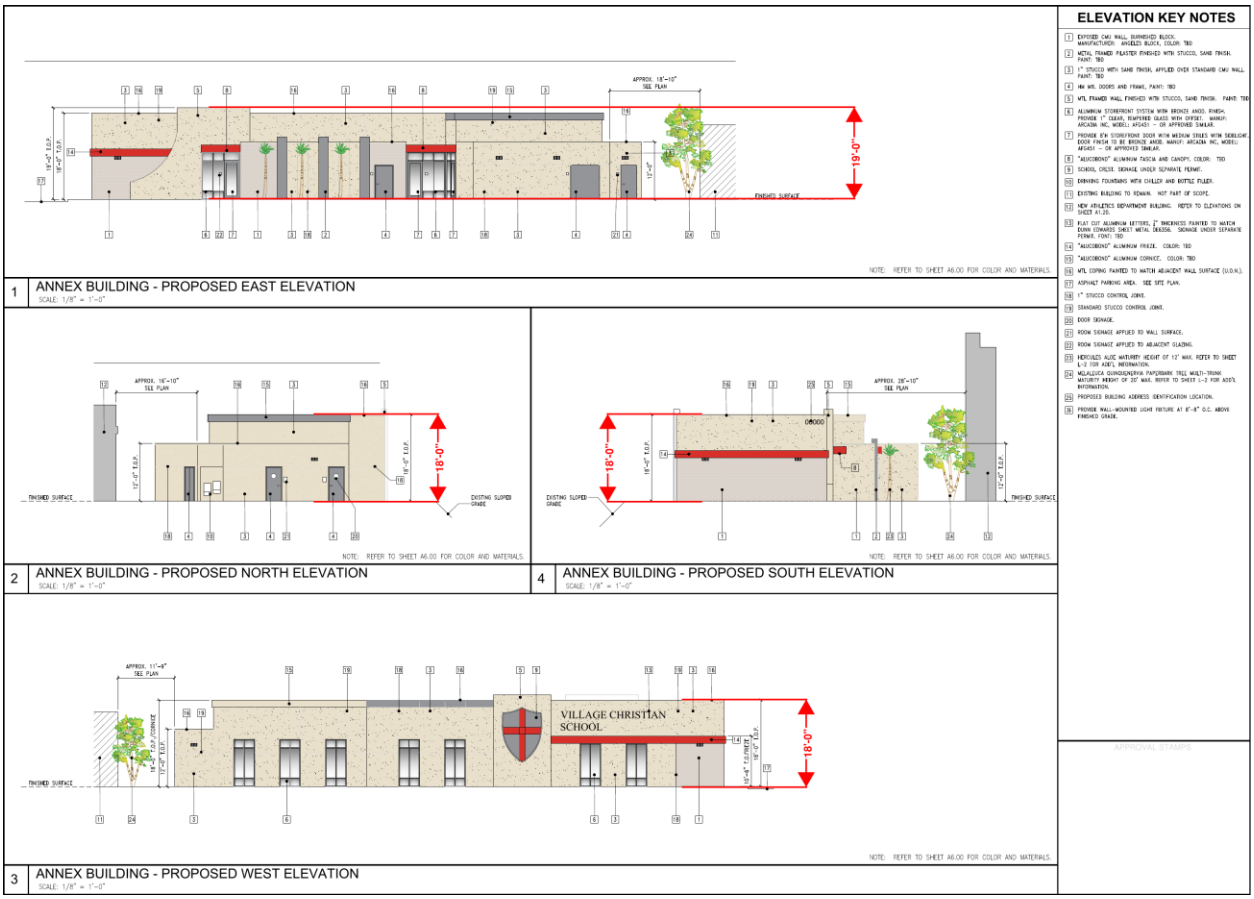

Figure 9 – Annex: Proposed Elevations (Sheet A2.20)

Figure 10 – Building 10: Proposed Elevations (Sheet A3.20)

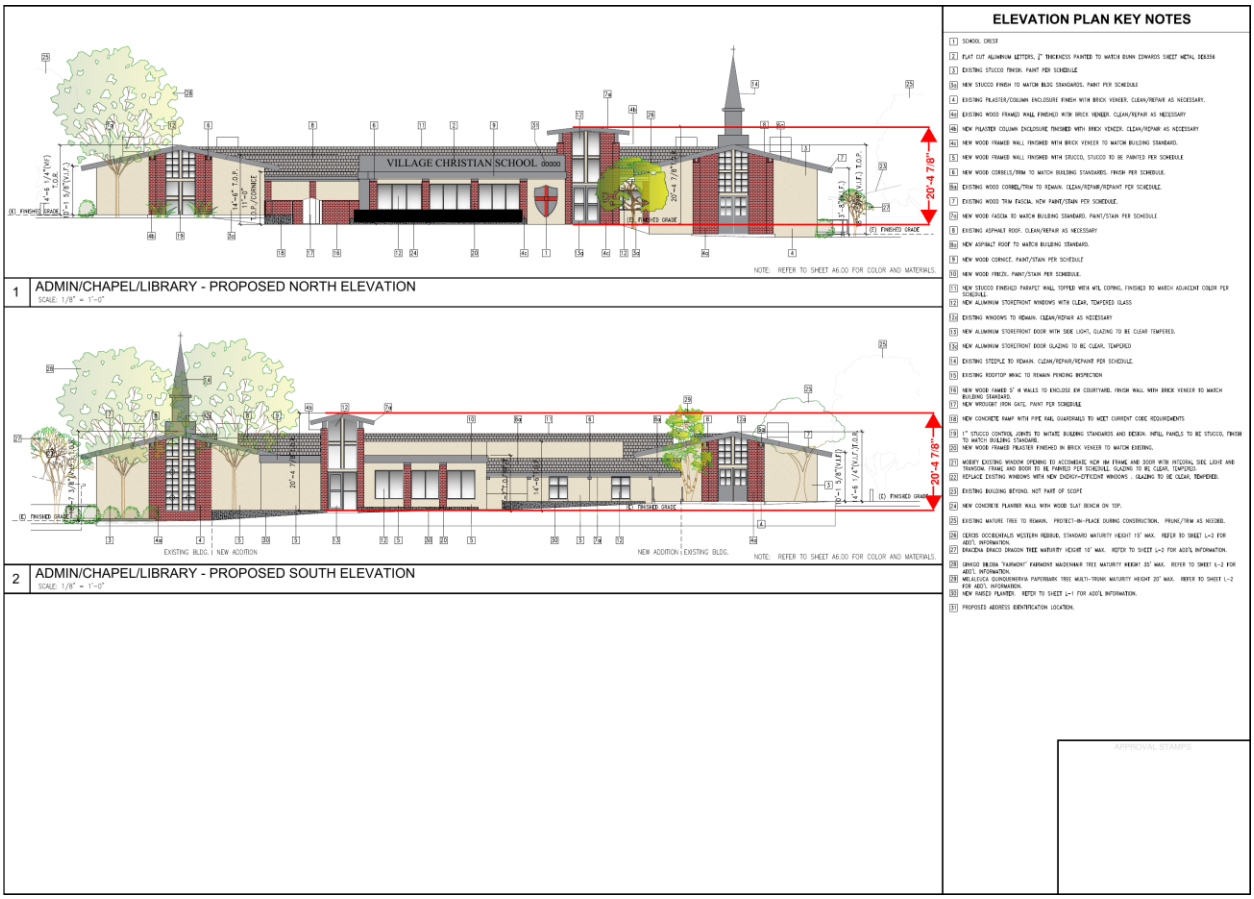

Figure 11 – Administration Building: Proposed Elevations (Sheet A4.20)

8.3 Water Supply, Fire Flow, and Hydrants

Water supply is governed by 2025 CFC §507 and CWUIC §404. Fire flow and hydrant criteria are established with LAFD at building permit plan check, including the applicability of CFC Appendix B (fire flow requirements) and Appendix C (fire hydrant locations and distribution) and the LAFD letter's 300 ft hydrant criterion. Applicability of Appendices BB and CC, which detail fire flow and hydrant requirements for school buildings specifically, is subject to AHJ confirmation.

The plans show the existing hydrants. The fire flow test, required fire flow calculation, hydrant coverage diagram, and water main capacity analysis are required with the building permit submittal for LAFD review. Early completion of the analysis is recommended, as results can affect main sizing, hydrant locations, fire department connection (FDC) locations, and phasing. In its 5 May 2026 correspondence, LAFD identified that one or more additional fire hydrants may be

required to satisfy the requirement for an approved fire hydrant within 300 ft, and that the number and location of any required hydrants will be determined on review of the plot plan.

8.4 Emergency Responder Communication Coverage

The LAFD letter cites emergency responder radio coverage (FPB 105). The letter asks the team to confirm the current City code section, potential exception as noted by Applicant (K. Corral, 3/18/26), and LAFD determination in writing at plan check. It further states that if required, the owner will need to perform a radio coverage assessment and design the communications enhancement system at plan check. These items are addressed at plan check.

9. WILDLAND-URBAN INTERFACE EXTERIOR (IGNITION-RESISTANT) CONSTRUCTION

The 2025 CWUIC Chapter 5 construction requirements, as amended by the City, apply to new buildings and to additions and alterations in the FHSZ. Matrix 1 (Section 12) details the required 2025 CWUIC exterior envelope elements. A predominantly noncombustible palette is favorable, but general design intent (i.e., Class A roofing, no wood siding, and double-pane glazing) does not by itself demonstrate compliance. The final documents must identify compliant assemblies, details, testing or listing basis, and limits of work.

Matrix 2 (Section 13) summarizes the required plan check documentation. Items to be documented at plan check include the full Class A roof assembly, valley underlayment, eave/soffit assemblies, gutter debris protection, multilayer glazing with at least one tempered pane (or another permitted option), compliant exterior doors, and flame- and ember-resistant vents. A product need not be listed where the code permits a prescriptive or tested alternative, but the selected compliance path must be documented.

10. ALTERNATIVE MEANS AND METHODS FOR COMPLIANCE

The California codes authorize the building official and fire code official to approve alternative materials, designs, and methods where the proposal meets code intent and provides equivalent protection (2025 CBC §104.2.3; 2025 CFC §104.2.3). The fire code official may also approve modifications to fire apparatus access under 2025 CFC §503.2.2. Approval is discretionary and project-specific.

For this Project, a discretionary approval would apply only to the gymnasium aerial access condition described in Section 8.2. Because LAFD took no exception to the proposed configuration in its preliminary review, an AMMR is not presently anticipated; if formal relief is required at plan check, the ordinary instrument is a fire apparatus access modification under 2025 CFC §503.2.2. An AMMR would be appropriate only after the project team documents the prescriptive condition, required baseline systems, emergency operations, and proposed compensating measures. Candidate measures may include system enhancements, standpipe/ FDC arrangement, interior roof access, and verified ground ladder access; none are presumed equivalent or acceptable to LAFD in advance. Landscape or protected tree conflicts should be handled through the applicable landscape, tree, and code approval processes rather than assumed to fit the same AMMR.

11. ONGOING OPERATIONS, MAINTENANCE, AND RED FLAG READINESS

Passive design measures and access provisions are only effective if maintained and supported by operational preparedness over the life of the campus. SGH recommends the following be considered as a campus wildfire readiness program. Except where a statute or code section is cited, the measures in this section are recommended practices rather than code requirements.

11.1 Operational Readiness and Red Flag Procedures

- Develop a campus wildfire operations checklist that prioritizes removal of combustible furniture, storage, mulch, and debris from the first 5 ft around buildings and from recessed entries and courtyards; verify emergency gates and Knox devices; and clears roofs, gutters, and managed landscape areas before forecasted Red Flag (high fire risk weather) events. The first 5 ft is treated as a recommended ember-resistant practice pending final statewide Zone 0 regulations.
- Provide periodic training for facilities staff so they understand emergency access gate operation, the campus evacuation/shelter plan, and Red Flag day operations; coordinate the student evacuation and shelter in place procedures with LAFD.
- Conduct an annual inspection before the local peak fire season and before severe wind events to verify that vents, gutters, fire access gates, hydrants/FDCs, and defensible space areas are functional, accessible, and free of fuel accumulation.

11.2 Defensible Space Maintenance Program

- Maintain brush clearance and defensible space in accordance with California Government Code §51182, LAFD Brush Clearance requirements (LAMC §57.4906.5.2), the approved City landscape/fuel modification documents, and protected-tree conditions. Los Angeles County Zone 1/2/3 designations are not the governing maintenance standard within the City.
- Keep grasses and weeds along fences and walls cut low, store combustible materials away from structures, and keep roofs, gutters, and hardscape clear of leaf and needle litter, particularly ahead of forecasted Santa Ana wind events.
- Treat the approved landscape, fuel modification, and maintenance documents as living records; update them when planting, construction phasing, or site use changes, and maintain defensible space continuously.

12. MATRIX 1: LAFD 12 JANUARY 2026 RECOMMENDATIONS CONFORMANCE

The statuses reflect the entitlement stage, before construction documents exist. Items marked D are building permit items: construction-level documentation is required with the building permit submittal and verified by LAFD and LADBS at plan check, the stage at which the City applies its FHSZ Supplemental Checklist. The LAFD preliminary review described in Section 8.1 confirmed that all fire code items cited in the 12 January 2026 correspondence have been tentatively addressed. Statuses are not findings that the Project cannot comply with code requirements.

No.	LAFD Recommendation (12 Jan 2026)	Current Code Reference	Project Response / Location	Status[1]
1	Fire department access to/into all new and expanded structures	2025 CFC §503; App. D	Access routes are shown, with the 150 ft reach, dead ends, and widths dimensioned (Figures 5 to 7); aerial geometry and final LAFD approval are confirmed at plan check; see Items 4, 7, 15, and 16.	D
2	Address identification, legible from street	2025 CFC §505	FD Note 19 (Sheet A0.12); address locations and visibility are required on the building permit documents.	D
3	Knox box(es), location/ number per LAFD	2025 CFC §506	New gate at emergency/fire access road; FD Note 1 (Sheet A0.12).	D
4	No building portion > 150 ft from roadway/fire lane	LAFD; 2025 CFC §503	Dimensioned on the reviewed plans; at the administration building, a future phase, the travel distance exceeds 150 ft by approximately 28 ft; for a fully sprinklered building, LAFD may approve the distance at the permit for that phase (2025 CFC §503.1.1, Exception 1.1, subject to any City amendment; Sheet A0.0 sprinkler note; Sheet A0.11B).	D
5	Fire lane width ≥ 20 ft (≥ 28 ft for aerial/hydrant)	2025 CFC §503.2.1; App. D §D103.1, §D105.2; LAFD	General access routes and the 28 ft road along the southwestern gymnasium side are shown; aerial and hydrant width geometry is confirmed with LAFD at plan check. Building 10 and administration building (future phases): the northern 24 ft lane is shown; where it overlaps existing staff parking, the clear width is maintained at the permit for each phase through an LAFD-accepted approach (Section 8.1), and hydrant geometry is confirmed with LAFD at plan check.	D
6	Fire lane clear to sky	2025 CFC §503.2.1	Notes state open to sky (Sheet A0.12); 14 ft clearance at gates, trees, and utilities is verified at plan check.	D

No.	LAFD Recommendation (12 Jan 2026)	Current Code Reference	Project Response / Location	Status[1]
7	Dead-end roads must be ≤ 700 ft or require secondary access; fire lanes and dead ends terminate in cul-de-sac/turnaround	2025 CFC §503.2.5, App. D Table D103.4; LAFD	Dead ends are dimensioned on site plans; no dead ends exceeding 700 ft are shown. LAFD approval is obtained at plan check.	D
8	Plot plan indicating access road and turning area	2025 CFC App. D	Access and turning areas are shown; dimensioned turning geometry and LAFD approval are completed at plan check.	D
9	Fire lane parking posting/ striping before Temporary Certificate of Occupancy	2025 CFC §503.3; App. D §D103.6	FD Notes 6, 7, 9 (Sheet A0.12).	D
10	Electric gates fire department tested before Certificate of Occupancy	2025 CFC §503.6	FD Note 8 (Sheet A0.12).	D
11	No framing until roadway installed	LAFD construction sequencing	FD Note 10 (Sheet A0.12).	D
12	Roadway grade ≤ 10%	2025 CFC App. D §D103.2; LAFD	The Applicant's 21 April 2026 response states that the civil engineer will revise the grading plan for a road slope of 10% or less, and Sheet L-1 notes a 10% maximum at the emergency vehicle access lane; LAFD approves the final grade at plan check.	D
13	Conform to standard street dimensions shown by Public Works Std. Plan S-470-0	LA Public Works S-470-0	This is a BOE and Public Works standard rather than a fire code item, and it falls outside the jurisdiction of the LAFD Hydrant and Access Unit. The School has requested waiver of the BOE recommendations through the entitlement process.	E
14	Standard cut-corners at turns	2025 CFC App. D	Turn geometry is shown on the site plans; final dimensions are confirmed with LAFD at plan check.	D
15	Additional access where buildings > 30 ft	2025 CFC App. D §D104.1	Applies to the gymnasium (approximately 35 ft); additional/aerial access is demonstrated at plan check. Building 10 (29 ft 6 in.) is below the trigger.	D
16	Aerial access where roof height > 30 ft	2025 CFC App. D §D105	Gymnasium: 28 ft aerial access segment shown (Sheet A0.11); LAFD took no exception to the configuration in its preliminary review, and final geometry is confirmed at plan check (Sections 8.2 and 10).	D
17	Structures within 300 ft of hydrant; entrances within 150 ft	2025 CFC §507.5; App. C/CC; LAFD	Existing hydrants are shown; fire flow, coverage, spacing, entrance distances, and any additional hydrants that LAFD requires are demonstrated at plan check.	D
18	VHFHSZ: Comply with wildfire provisions (letter cites 2023 LAFC §4911)	2025 CWUIC as amended by LAMC Ch. V, Art. 7.1;	VHFHSZ indicated; siting, landscape, envelope, access, and water supply are addressed in Sections 7 to 9, with	D

No.	LAFD Recommendation (12 Jan 2026)	Current Code Reference	Project Response / Location	Status[1]
		California Government Code §51182; applicable 2025 CFC provisions	construction-level documentation required with the building permit submittal.	
19	Mitigating measures: boxed-in eaves; double-paned/ insulated windows; non-wood siding; exposed wood members ≥2 in. thick; noncombustible finishes	2025 CWUIC §504.3, §504.5, §504.8	Noncombustible material palette shown (Sheet A6.00); eave, glazing, door, vent, and assembly details are required with the building permit submittal (Matrix 2).	D
20	100 ft irrigated/managed greenbelt buffer	California Government Code §51182; LAFD letter; 2025 CWUIC §604 and §609	100 ft buffer note shown; the 30 ft and 100 ft zones are shown in Figure B-1 and delineated at the gymnasium on Sheet L-1; City fuel modification and maintenance details are required with the building permit landscape submittal.	D
21	Landscaping with fire-resistant plants/materials	2025 CWUIC §603, App. F	Fire-smart plant palette shown (Sheet L-2); City spacing requirements and protected-tree coordination are required on the building permit landscape plans.	D
22	Noncombustible (Class A) roofs	2025 CWUIC §504.2	Class A roof shown (Sheet A6.00; FD Note 14); the complete assembly is required with the building permit submittal.	D
23	Periodic brush clearance/ thinning under LAFD supervision	2025 CWUIC §604; Gov. Code §51182	Maintenance note shown (Sheet L-2); City landscape, fuel modification, and maintenance documents are required with the building permit submittal (Section 11.2).	D
24	Show overhead utility lines adjacent to site	LAFD	No on-site overhead utilities identified; off-site utility clearances are required on the building permit site plans.	D
25	14 ft overhead clearance for fire department apparatus	2025 CFC §503.2.1 (13 ft-6 in.); LAFD (14 ft)	Open-to-sky note shown (Sheet A0.12); the 14 ft overhead clearance is verified at plan check.	D
26	Emergency responder radio coverage (FPB 105)	2025 CFC §510	Applicant cites an exception (FPB 105); LAFD makes the applicability determination at plan check.	D
27	Ships ladders for roof elevation changes > 3 ft	LAFD/LAMC	Note added to roof plans; FD Note 18 (Sheet A0.12).	D
28	Multi-story residential stairwell to roof	LAFD	Non-residential campus (comment not applicable).	N/A
29	Main lobby entrance on address side	LAFD	Gym entry from main campus entrance; FD Note 19 (Sheet A0.12).	D
30	Fire annunciator panel / control room location within 20 ft of main entrance stairwell	LAFD letter; 2025 CFC fire alarm provisions and NFPA 72, as locally amended	Fire alarm design-build, tie to campus system; FD Note 20 (Sheet A0.12).	D

No.	LAFD Recommendation (12 Jan 2026)	Current Code Reference	Project Response / Location	Status[1]
31	Off-site/on-site hydrants per LAFD review	2025 CFC §507.5; App. C/CC	Fire flow and hydrant analysis is prepared by the fire life safety consultant for LAFD review at plan check; FD Notes 21–22 (Sheet A0.12).	D
32	Hydrants operational before construction	2025 CFC §507.5.1	Addressed in the construction sequencing plan required with the building permit documents.	D

[1]Status check key: A = addressed on the entitlement documents reviewed; D = documented at building permit (construction-level documentation is required with the building permit submittal and verified by LADBS or LAFD at plan check); E = determined through the entitlement process or by another City department rather than fire code plan check; N/A = not applicable. Where an item has elements in more than one category, both are shown (for example, A/D).

13. MATRIX 2: WUI EXTERIOR ENVELOPE (IGNITION-RESISTANT CONSTRUCTION) COMPLIANCE

Evaluated against the current 2025 CWUIC Chapter 5 requirements as amended by the City of Los Angeles. Site planning and vegetation requirements are addressed separately in Section 7. Status key as in Matrix 1 (Section 12).

Envelope Element	Requirement	Current Code Reference	Design Provision (Entitlement)	Status[1]
Roof covering / assembly	Class A roof assembly	2025 CWUIC §504.2	Class A roof designation shown (Sheet A6.00); assembly, underlayment, and compliance basis are required with the building permit submittal.	D
Roof valleys / edges	Valley flashing ≥ 0.019 in. (No. 26 galvanized sheet gage) corrosion-resistant metal over a minimum 36 in. wide 72 lb mineral-surfaced cap sheet	2025 CWUIC §504.2.2	To be detailed at plan check.	D
Eaves / soffits	Enclosed or open-eave assemblies must use one of the materials or tested assemblies permitted by CWUIC §§504.3 and 504.3.1	2025 CWUIC §504.3, §504.3.1	No exposed combustible eaves are proposed; eave assemblies are required on the building permit documents.	D
Gutters / downspouts	Noncombustible; debris guards	2025 CWUIC §504.4	Noncombustible (metal) per palette; guards are required on the building permit documents.	D
Exterior walls / siding	Compliant exterior wall assembly/covering and required noncombustible flashing; wood is permitted only through an expressly allowed compliance path	2025 CWUIC §504.5	Stucco, masonry, and metal palette shown (Sheet A6.00); wall assemblies and flashing details are required with the building permit submittal.	A/D
Underfloor enclosure	Enclosed to grade per §504.6	2025 CWUIC §504.6	Slab-on-grade/enclosed/no basement; confirm at plan check.	D
Projections / decks	Ignition-resistant; enclosed undersides; deck flashing	2025 CWUIC §504.7	Limited combustible projections anticipated; detail at plan check	D
Exterior glazing / windows	Multilayered glazing with at least one tempered pane, 20 min. rated glazing, glass block, or glazing meeting SFM 12-7A-2	2025 CWUIC §504.8; 2025 CBC §2406	Exterior glass pane to be tempered at all new windows; to be detailed at plan check.	D

Envelope Element	Requirement	Current Code Reference	Design Provision (Entitlement)	Status[1]
Skylights	Multilayered glazing with at least one tempered pane, 20 min. rated glazing, glass block, or glazing meeting SFM 12-7A-2	2025 CWUIC §504.8.2	Confirm at plan check.	D
Exterior doors	Noncombustible / ignition-resistant / solid-core / fire rating ≥ 20 min.	2025 CWUIC §504.9	Non-wood doors intended; a permitted door assembly and ember-gap controls are required on the building permit documents.	D
Vents	SFM-listed wildfire flame- and ember-resistant vents or ASTM E2886-tested WUI vents; limited sloped-roof vents may use 1/16 to 1/8 in. noncombustible corrosion-resistant mesh	2025 CWUIC §504.10	Vent type, listing or test basis, locations, and installation details are required on the building permit documents.	D
Accessory structures / appurtenances (fences)	Requirements depend on structure size and separation from an applicable building; roofs and decks must also comply where triggered	2025 CWUIC §504.11; §608	The applicable size and separation requirements for accessory structures and fences are applied on the building permit documents.	D

[1]Status check key: A = addressed on the entitlement documents reviewed; D = documented at building permit (construction-level documentation is required with the building permit submittal and verified by LADBS or LAFD at plan check); E = determined through the entitlement process or by another City department rather than fire code plan check; N/A = not applicable. Where an item has elements in more than one category, both are shown (for example, A/D).

14. TITLE 14 STATE MINIMUM FIRE SAFE REGULATIONS AND LADBS FIRE HAZARD SEVERITY ZONE CHECKLIST CONFORMANCE

At the City's request, this section documents the Project's conformance with the Title 14 State Minimum Fire Safe Regulations (California Code of Regulations [CCR], Title 14, Division 1.5, Chapter 7, Subchapter 2, §§1270-1276) and the related defensible-space regulations (14 CCR §§1299.01-1299.05, implementing PRC §4291), as well as conformance to 2025 CWUIC and applicable City requirements for projects in VHFHSZs via the LADBS FHSZ Supplemental Checklist (PC/STR/Corr.Lst.116 edition). Section 14 and the LADBS FHSZ Supplemental Checklist Compliance Tracking Matrix (Matrix 3, Appendix A) are provided to support the administrative record in advance of the hearing.

14.1 Applicability

The Project parcel is within a VHFHSZ in an LRA (Section 6). The Title 14 State Minimum Fire Safe Regulations are the minimum wildfire protection standards of the California Board of Forestry and Fire Protection applying to development within fire hazard severity zones. The 2025 CWUIC, as amended by the City through LAMC Chapter V, Article 7.1, incorporates and cross-references these Title 14 provisions.

14.2 Basis of Conformance

In SGH's opinion, the Project is designed in a manner capable of conforming to the applicable Title 14 State Minimum Fire Safe Regulations, subject to the plan check verifications identified in Sections 7 and 8. The Title 14 subject areas map to the Project design and to this report as follows:

- **Emergency access (14 CCR §§1273.00–1273.10; 2025 CFC §503; 2025 CWUIC §404; LADBS Checklist Section II).** Road width, surface, grade, radius, dead-end length, and gate standards are evaluated in Section 8. The Project commits to the LAFD 12 January 2026 access conditions, including 28 ft width at aerial and hydrant locations, a 10% maximum access road grade, and dimensioned dead-end geometry and 150 ft access-reach verification on the final civil plans; aerial apparatus access for the new gymnasium is addressed through the compliance path in Sections 8 and 10.

- **Signage and building numbering (14 CCR §§1274.00–1274.04, 2025 CFC §§505-506).** Fire lane and road signage, address identification, and Knox boxes are committed on the plan notes and are required at final locations on the building permit documents (Section 8).

- **Emergency water supply (14 CCR §§1275.00–1275.04; 2025 CFC §507; CWUIC §404).** Water supply, required fire flow, and hydrant coverage are addressed in Section 8; the fire flow test, required fire flow calculation, and hydrant coverage are required with the building permit submittal for LAFD confirmation.

- **Fuel modification, building siting, and setbacks (14 CCR §§1276.00–1276.05; CWUIC §603, §604, and §608.2 [14 CCR §1276.01(a)]; LADBS Checklist Sections II and X).** The 30 ft fuel modification zone, fire-smart vegetation, and the 30 ft building setback (or approved alternative features) are addressed in Section 7; a City jurisdiction landscape and fuel modification plan is required with the building permit submittal for LADBS and LAFD approval; the dimensioned 2025 CWUIC §608.2 setback conditions are shown in Figures 5 to 7.

14.3 Conclusion

The requirements of the LADBS FHSZ Supplemental Checklist are addressed within this report or committed for demonstration on the construction documents and verification by LADBS and LAFD at plan check. The completed LADBS checklist, the City jurisdiction landscape and fuel modification plan, the 2025 CWUIC §608.2 setback analysis, and the LAFD access and water supply confirmations are produced and reviewed during the building permit process; they are not entitlement submittals. Section 14 and Matrix 3 document the Project's conformance capability for the entitlement record. These findings are technical and are intended only to assist the City's review; final determinations regarding code applicability, regulatory interpretation, and the adequacy of proposed mitigation measures remain within the authority of the City and LAFD.

15. IMPLEMENTATION ROADMAP

The wildfire mitigation measures should be carried through the Project's phased delivery as follows:

15.1 Design and Permitting

- Carry the current CWUIC, City amendments, and fire service requirements into each phase as baseline scope, including a dimensioned §608.2 setback/alternative analysis and 30 ft fuel modification information.
- Verify the project parcel/APN, adopted FHSZ designation, and code edition for each phase; update all legacy 2023 code references.
- Submit the City jurisdiction landscape/fuel modification documents early and coordinate the plant palette, 100 ft defensible space limits, 30 ft fuel modification zone, building siting, slopes, and protected trees with LADBS/LAFD.
- Obtain LAFD access clearance before finalizing building height and site circulation; separately complete the fire flow/hydrant analysis and WUI envelope specifications.

15.2 Phased Construction

- Sequence the work by phase (Phase I gymnasium/annex; Phase II administration; Phase III Building 10), install required roadways before framing (Fire Department Note 9) and complete fire department testing of gates.
- Establish required defensible space and managed vegetation around each completed phase and maintain continuous interim clearance along the active brush interface.
- Include the WUI envelope details (vent types, eave closures, cladding, roof-edge flashings, glazing) in submittal reviews and field verification.

15.3 Occupancy and Operations

- Provide the school with a concise campus wildfire readiness guide summarizing defensible space housekeeping, Red Flag procedures, and emergency access provisions (Section 11).
- Schedule annual maintenance and inspection before peak fire season and revisit the wildfire measures if significant remodels, plant replacements, or new systems are added in the future.

16. OBSERVATIONS AND OPINIONS

Based on the documents reviewed and the codes and standards identified above, it is SGH's professional opinion, within the scope and limitations of this entitlement-level review, that:

- **Overall.** The entitlement documents identify the applicable wildfire measures and respond to each of the LAFD 12 January 2026 recommendations (Matrix 1). Detailed compliance for the access, building siting, landscape, and water supply items will be demonstrated to the AHJ at plan check, consistent with the entitlement-stage scope of this review. The plan check items are regularly encountered at this stage and of a type routinely resolved at building permit plan check. SGH identified no condition at the entitlement level that would preclude the Project from meeting the applicable wildfire requirements, subject to LAFD and LADBS approvals through the identified compliance paths.

- **FHSZ status.** The Project is identified as a VHFHSZ in an LRA by CAL FIRE mapping (Figure 4) and the LAFD letter. The applicable WUI and Government Code §51182 requirements are mandatory, not discretionary. This report treats the City/ZIMAS APN (2404001019) as controlling; the County Assessor parcel locator returns APN 2404001006 for this address; the VHFHSZ requirements apply under either number.

- **Code edition.** Permit applications under the 2025 cycle should use the 2025 CWUIC, CBC, and CFC as amended by the City of Los Angeles. The LAFD letter's 2023 code references should be translated to current provisions in the permit documents.

- **Defensible space and fuel modification**. The managed buffer, fire-smart palette, and 30 ft and 100 ft fuel modification zones (Figure B-1) are consistent with the LAFD recommendations and Government Code §51182, under which the 100 ft distance ends at the property line except as subparagraph (B) provides; the full 30 ft zone lies within the property for each new or expanded building. The City fuel modification details, maintenance plan, and protected-tree coordination are required with the building permit landscape submittal. Los Angeles County Fuel Modification Plan guidance is not the governing framework for this project. These items are carried as priority action [R6] in Section 17.

- **Fire apparatus access.** Access routes, widths, dead ends, and the 150 ft reach are dimensioned on the entitlement plans (Figures 5 to 7). The gymnasium aerial access configuration, the Building 10 north lane, and the administration building access reach are confirmed with LAFD at plan check through the paths identified in Sections 8 and 10. In its 5 May 2026 preliminary review, LAFD found that the Applicant had tentatively addressed all cited fire code items and reserved identification of additional requirements to later review (Section 8.1); final confirmation occurs at building permit plan check.

- **Building siting.** No proposed building or tenant improvement is within 30 ft of a property line or of a public road. The only 2025 CWUIC §608.2 proximity conditions arise at internal campus fire apparatus access drives (Figures 5 to 7). The classification of those drives under 14 CCR §1270.01, and any setback reduction with alternative features under §608.2.1, are determinations for the code official at building permit plan check. This item is distinct from defensible space maintenance.

- **Water supply.** Existing fire hydrants are shown on Sheet A0.11. Required fire flow, hydrant coverage, and water main capacity are established through LAFD's fire flow and hydrant review at building permit plan check; SGH's entitlement review did not include water system analysis (Section 18). LAFD has identified that one or more additional fire hydrants may be required to satisfy the 300 ft criterion; the number and location are determined on review of the plot plan, and required hydrants are provided as a condition of the building permit.

- **Exterior envelope.** The noncombustible material palette (Sheet A6.00), Class A roof, and tempered exterior pane at new windows are consistent with 2025 CWUIC Chapter 5. Assemblies, doors, and listed or tested vents are required on the construction documents and verified at plan check (Matrix 2).

- **Emergency responder communication coverage**. LAFD determines applicability and any exception in writing at plan check (FPB 105).

17. RECOMMENDATIONS AND NEXT STEPS

SGH recommends the following next steps, generally in priority order, to support plan check demonstration subsequent to entitlement approval:

- **[R1] Maintain parcel and Fire Hazard Severity Zone documentation.** Carry the ZIMAS Assessor's Parcel Number (2404001019), shown on Sheet A0.0, on all permit sheets, including the civil sheets.
- **[R2] Confirm code edition and update notes.** Apply the 2025 California codes and City of Los Angeles amendments for each permit phase; replace legacy 2023 code references in submittal with current provisions prior to submission after the City has completed the amendment process.
- **[R3] Complete LAFD Hydrant and Access Unit review.** The Unit issued preliminary written confirmation on 5 May 2026 (Section 8.1). Final access and hydrant confirmation is completed with the Unit at building permit plan check.
- **[R4] Confirm aerial apparatus access for the gymnasium.** LAFD took no exception to the proposed 28 ft roadway configuration in its preliminary review; confirm the final configuration with the Hydrant and Access Unit at plan check, through a fire apparatus access modification under 2025 CFC §503.2.2 if required.
- **[R5] Confirm building siting.** Address the 2025 CWUIC §608.2 setback provisions, including any setback reduction with alternative features under §608.2.1, with LADBS at plan check.
- **[R6] Prepare City landscape and fuel modification documents.** Show the 30 ft fuel modification zone, 100 ft statutory defensible space, irrigation, plant spacing, ground cover, maintenance, phasing, and protected tree coordination.
- **[R7] Complete water supply design.** Verify required and available fire flow, main capacity, hydrant number, spacing, and coverage, and FDC locations with LAFD, including the additional hydrant or hydrants identified in LAFD's 5 May 2026 correspondence.
- **[R8] Confirm emergency responder communication coverage.** Obtain LAFD's written applicability or exception determination.
- **[R9] Document WUI envelope compliance.** Specify the complete Class A roof assembly, valleys, eaves, walls, glazing, doors, vents, gutters, projections, and accessory structures using permitted prescriptive, tested, or listed paths at the time of detailed design.

- **[R10] Establish operational readiness.** Develop Red Flag procedures, staff training, access gate checks, defensible space inspections, and evacuation/shelter coordination with LAFD before occupancy.

18. LIMITATIONS

This report is an entitlement-level desktop review prepared solely for Mailian & Associates and Village Christian School in support of Case No. CPC-2025-6478-CU3-SPPC. SGH relied on the documents identified in Section 3 without independent verification. This is not a building permit plan check review or code compliance certification. SGH did not perform a site visit, field measurements, fire flow testing, wildfire or evacuation modeling, active system design, or structural, civil, geotechnical, or water system analysis. SGH relied on the drawing set for access dimensions and hydrant locations, applied the City ZIMAS APN (Section 6.1), and plotted the property line in Figure B-1 from the maximum yard setback line on Sheet A0.0; AHJ approvals occur at building permit plan check. The applicable code edition is determined by each phase's permit application date and transition provisions. Items identified in this report for documentation at building permit are subject to demonstration at plan check. This report may be revised if additional or updated information becomes available.

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APPENDIX A

Matrix 3 – LADBS Fire Hazard Severity Zone Supplemental Checklist Compliance Tracking

This appendix tracks the Project item-wise against the Los Angeles Department of Building and Safety (LADBS) Fire Hazard Severity Zone Supplemental Checklist (PC/STR/Corr.Lst.116 edition). Construction items are cross-referenced to Section 9 and Section 13 (Matrix 2); site and vegetation items to Section 7; access and water items to Section 8. Listed status reflects the entitlement stage and does not substitute for LADBS and Los Angeles Fire Department (LAFD) plan-check approval; status key as in Matrix 1 (Section 12). Acronyms and abbreviations are defined in the main report.

Item	Requirement	Current Code Reference	Project Response / Location	Status[1]
I.	**General**			
I.1	Buildings in a VHFHSZ/HFHSZ shall comply with the CWUIC as amended by LAMC Chapter V, Article 7.1.	CWUIC §101.3.1; LAMC Ch. V, Art. 7.1	Applicability addressed in Section 6.	A
I.2	New, relocated, and additions or alterations to existing buildings shall comply with the CWUIC.	CWUIC §§101.5, 105.2	Applicability addressed in Sections 6 and 9; compliance required on the construction documents and verified at plan check.	D
I.3	Buildings in a VHFHSZ shall comply with applicable City WUI requirements.	LAMC §§91.7201.2, 91.7202, 91.7207	Addressed in Section 9 and Matrix 2; compliance is verified at plan check.	D
I.4	Accessory buildings and miscellaneous structures shall comply with applicable CWUIC provisions.	CWUIC §§101.3.1, 504.11	Addressed in Section 9 and Matrix 2; applicability and requirements are verified at plan check.	D
I.5	Obtain LAFD Hydrant and Access Unit clearance.	LADBS Checklist; LAFD Hydrant and Access Unit	Addressed in Section 8; the Unit conditionally approved the proposal in writing on 5 May 2026 for the CUP process, and final clearance is issued at plan check.	A/D
II.	**Site Plan and Landscaping**			
II.1	Site plan shows topography, access road width/grade, landscaping, structures, utilities, occupancy, ignition-resistant construction type, roof classification, and water supply.	CWUIC §106.3	Addressed in Sections 7 and 8 and on the architectural and civil plans; final verification occurs at plan check.	D
II.2	Landscape plan shows 30 ft fuel management zone, vegetation, irrigation, plant legend, and ground cover.	CWUIC §604	Addressed in Section 7 and Figure B-1; the City landscape and fuel modification plan is required with the building permit submittal.	D
II.3	New vegetation shall be fire-smart.	CWUIC §§603.4, 603.4.2.1	Addressed in Section 7; required on the building permit landscape plans.	D

Item	Requirement	Current Code Reference	Project Response / Location	Status[1]
II.4	Shrubs comply with height, diameter, spacing, and separation requirements.	CWUIC §603.4.1	Addressed in Section 7; required on the building permit landscape plans.	D
II.5	Trees within the fuel-management area comply with separation requirements.	CWUIC §603.4.2	Addressed in Section 7; required on the building permit landscape plans.	D
II.6	Required landscaping plan note provided where applicable.	LADBS Checklist Section II	Landscaping is proposed; the note is required on the building permit landscape plans.	D
III.	**Ignition-Resistant Construction and Materials**			
III.1	Ignition-resistant construction complies with required fire resistance testing standards.	CWUIC §501.3	Addressed in Section 9 and Matrix 2; assemblies are verified at plan check.	D
III.2	Noncombustible materials comply with applicable testing requirements.	CWUIC §501.4	Addressed in Section 9 and Matrix 2; compliance is verified at plan check.	D
IV.	**Roof Construction**			
IV.1	Class A roof assembly provided.	CWUIC §504.2	Addressed in Matrix 2; roof assembly required with the building permit submittal.	D
IV.2	Class A equivalent exempt assemblies used where permitted.	CWUIC §504.2	Reference provision; applicability depends on selected assembly.	N/A
IV.3	No wood shake or wood shingle roofing.	LAMC §§91.1505.1, 91.7207.4	No wood shake or wood shingle roofing indicated.	A
IV.4	Roof covering void protection provided.	CWUIC §504.2.1	Required on the construction documents.	D
IV.5	Valley flashing and underlayment provided.	CWUIC §504.2.2	Addressed in Matrix 2; required on the construction documents and verified at plan check.	D
IV.6	Enclosed eaves and soffits protected.	CWUIC §504.3	Addressed in Matrix 2; assemblies required on the construction documents and verified at plan check.	D
IV.7	Open eaves and roof deck undersides protected.	CWUIC §504.3.1	Compliance path required on the construction documents.	D
IV.8	Existing roof replacement complies where triggered.	CWUIC §§504.2, 504.2.1	Applicability to existing buildings is confirmed at plan check.	D
IV.9	Skylights comply with WUI glazing provisions.	CWUIC §504.8.2	Skylight specifications required on the construction documents.	D

Item	Requirement	Current Code Reference	Project Response / Location	Status[1]
V.	**Gutters and Downspouts**			
V.1	Noncombustible gutters/downspouts with debris protection.	CWUIC §504.4	Addressed in Matrix 2; required on the construction documents and verified at plan check.	D
VI.	**Exterior Walls**			
VI.1	Exterior wall assemblies comply with permitted construction options.	CWUIC §504.5	Addressed in Section 9 and Matrix 2; assemblies required on the construction documents and verified at plan check.	D
VI.2	Exterior wall coverings comply with WUI requirements.	CWUIC §504.5.2	Noncombustible material palette identified; compliance required on the construction documents and verified at plan check.	A/D
VI.3	Required flashing provided.	CWUIC §504.5.2.1	Addressed in Matrix 2; required on the construction documents and verified at plan check.	D
VI.4	Exterior glazing complies with WUI requirements.	CWUIC §504.8	Addressed in Matrix 2; compliance required on the construction documents and verified at plan check.	D
VI.5	Exterior doors comply with WUI requirements.	CWUIC §504.9	Addressed in Matrix 2; compliance required on the construction documents and verified at plan check.	D
VI.6	Windows within doors and glazed doors comply with applicable glazing requirements.	CWUIC §504.8	Glazed doors and windows within doors are addressed in Matrix 2; compliance required on the construction documents and verified at plan check.	D
VI.7	Garage door ember-gap limitations apply where required.	CWUIC §504.9	Garage door requirements are not expected to apply to the Project; confirm applicability during plan review.	N/A
VI.8	Residential automatic garage door openers shall provide battery backup where required.	CWUIC §504.9.1	Residential provision; not anticipated to apply to the Project.	N/A
VI.9	Required flashing at ground, deck, and roof intersections.	CWUIC §504.5.1	Addressed in Matrix 2; compliance required on the construction documents and verified at plan check.	D

Item	Requirement	Current Code Reference	Project Response / Location	Status[1]
VII.	**Underfloor Enclosures, Decks, and Projections**			
VII.1	Underfloor areas enclosed where applicable.	CWUIC §504.6	Applicability and details are confirmed at plan check.	D
VII.2	Underfloor utilities shall be enclosed or protected where required.	LAMC §91.7207.2	Residential provision; applicability is not anticipated but should be confirmed on construction documents.	N/A
VII.3	Projection and underfloor undersides protected.	CWUIC §504.7.1	Addressed in Matrix 2; required on the construction documents and verified at plan check.	D
VII.4	Deck, porch, balcony, and stair walking surfaces comply.	CWUIC §504.7.3.2	Addressed in Matrix 2; required on the construction documents and verified at plan check.	D
VII.5	Deck-to-wall flashing provided.	CWUIC §504.7.3	Addressed in Matrix 2; required on the construction documents and verified at plan check.	D
VIII.	**Vents**			
VIII.1	Vents resist ember and flame intrusion.	CWUIC §504.10	Addressed in Matrix 2; compliance required on the construction documents and verified at plan check.	D
VIII.2	Listed/tested WUI vents provided where required.	CWUIC §504.10.1	Basis of compliance required on the construction documents.	D
VIII.3	Permitted mesh provided where allowed.	CWUIC §504.10.2	Vent specifications required on the construction documents.	D
VIII.4	Vent locations comply with required clearances.	CWUIC §504.10.3	Vent locations required on the construction documents.	D
IX.	**Accessory Buildings**			
IX.1	Accessory structures comply with applicable separation and construction requirements.	CWUIC §§504.11, 503.2.4	Applicability and compliance are confirmed at plan check.	D
IX.2	Accessory building roof assemblies comply with Class A requirements.	CWUIC §§504.2, 504.2.1	Applicability and compliance are confirmed at plan check.	D
IX.3	Accessory structure decks comply with WUI provisions.	CWUIC §504.7.3	Applicability and compliance are confirmed at plan check.	D
IX.4	Awnings and canopies comply with CBC requirements.	CBC §3105	Compliance is confirmed at plan check.	D
X.	**Defensible Space**			
X.1	Provide a 30 ft setback from property lines and road centerlines, or approved alternative features.	CWUIC §608.2; 14 CCR §1276.01(a)	Addressed in Section 7 and Figures 5 to 7; no proposed building or tenant improvement is within 30 ft of	A/D

Item	Requirement	Current Code Reference	Project Response / Location	Status[1]
			a property line or public road, and conditions at internal campus drives are addressed at plan check through the road classification and, where applied, a setback reduction with alternative features under §608.2.1.	

[1]Status check key: A = addressed on the entitlement documents reviewed; D = documented at building permit (construction-level documentation is required with the building permit submittal and verified by LADBS or LAFD at plan check); E = determined through the entitlement process or by another City department rather than fire code plan check; N/A = not applicable. Where an item has elements in more than one category, both are shown (for example, A/D).

APPENDIX B

Dimensioned Fuel Modification and Statutory Defensible Space Zones

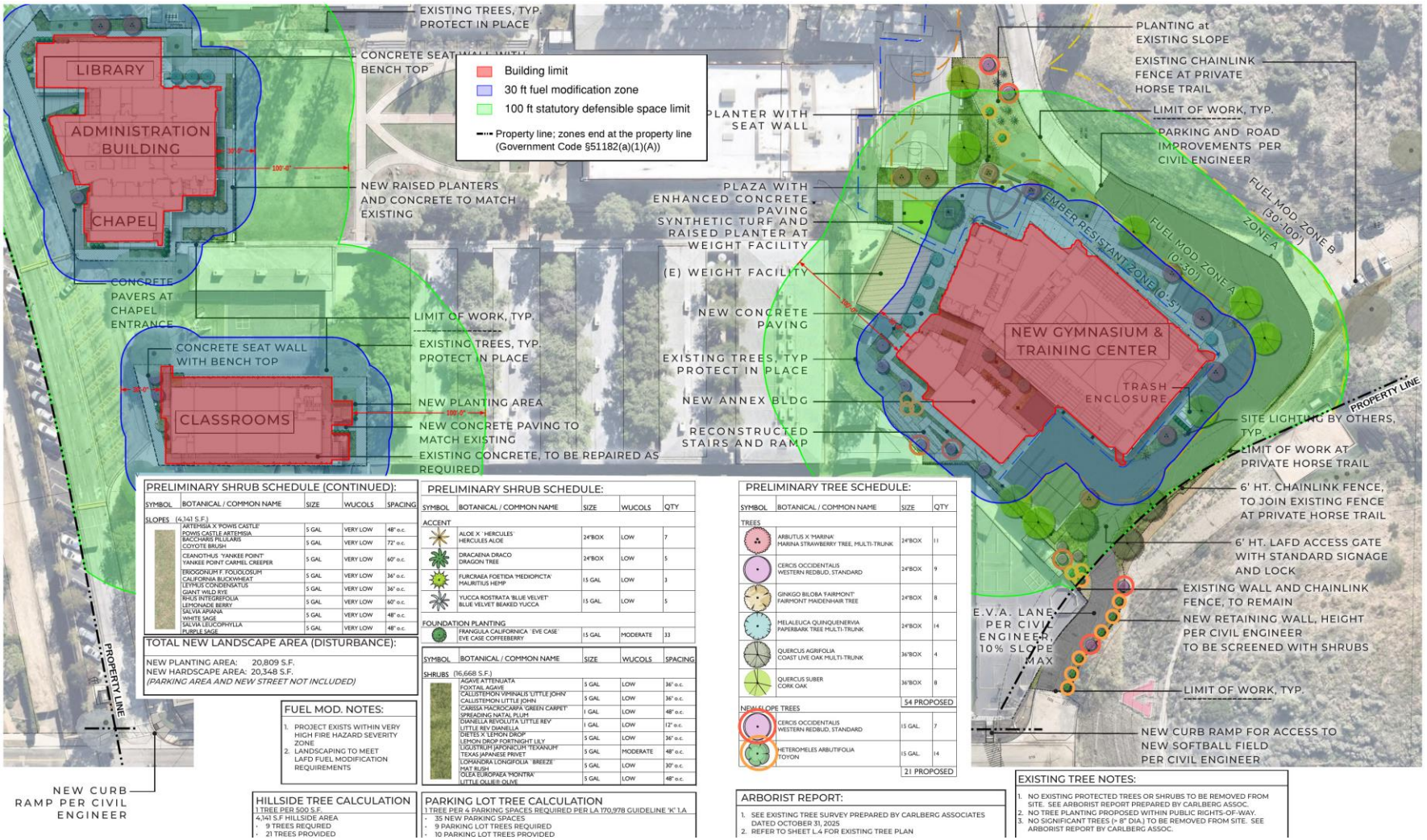

Figure B-1 – Dimensioned Fuel Modification and Statutory Defensible Space Zones (SGH Overlay on Sheet L-1)