

Communication from Public

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Comments for Public Posting: Supplemental Comment Regarding the 7-16-2025 Letter from Christal Cooper Submitted by: Doug Ross, Oceans 11 RV Park LLC – July 2025 Bottom line: Ms. Cooper’s letter simply re-packages allegations that have already been examined—and dismissed—by three separate administrative determinations. It offers no new evidence of any objective-standard violation under LAMC § 14.00 A.7. Most of this document is irrelevant to the appeal and not worth addressing, but there are a few points to address here. Cooper’s claim that the site is “a fully built RV park” is inaccurate; the project is roughly 90-95% complete. Ministerial compliance is determined before a permit is issued; you do not build a park and then seek permission. LADBS and Planning confirmed compliance at the plan-check phase, and three appeals upheld that finding. The current state of construction therefore has no bearing on whether the permit was ministerial. Zoning officials do not police construction details—LADBS or HCD does. If any field inspection finds a deviation, LADBS or HCD issues a correction notice; That is the correct procedure to follow as it has nothing to do with the permit issuance. Complaint volume ≠ violation. Submitting multiple complaints to LADBS, HCD, or any other agency does not certify wrongdoing—particularly when filings are repeatedly weaponized to achieve a political outcome. In this case complaints were investigated, no violations were found, and no correction orders were issued. The opponents’ dependence on their self-asserted “authority” is misplaced. The appeal Ms. Cooper references targets a permit that was unlawfully closed—a closure now being challenged in Superior Court. Until the court resolves that issue and a supplemental permit is duly issued, there is nothing legally left to appeal. McOsker’s intervention via Charter § 245 is therefore an attempt to sidestep the courts and disrupt due process. Scope of any § 245 review is strictly limited. Under City Charter § 245(a)–(b) the Council may assume jurisdiction only over a board or commission’s discretionary decision, and must decide the matter “on the record before the board or commission.” They may not consider new evidence or issues beyond the original appeal. Courts have voided Council actions that strayed from this mandate—see *West v. Chandler* (198 Cal.App.4th 1506) and *Chazanov* (LASC BS 135382). This does not include

ministerial permits that are shown to meet performance standards “Spot-zoning” allegation is misplaced. RV parks are expressly listed under LAMC § 14.00 A.7 as eligible Public-Benefit uses. Because the zoning code itself authorizes the use when all objective standards are met (as three determinations confirmed), the project cannot constitute spot zoning under California law (see *Terro Co. v. Ventura*, 16 Cal.App.5th 267, 275–278). Rehashing construction status or unrelated projects is irrelevant. The sole legal test that was under appeal is whether the original permit was issued in error—an issue already decided multiple times and are legally sound. Any attempt to inject discretionary requirements, construction progress or comparisons with unrelated parks exceeds § 245’s scope. These actions only magnifies the City’s liability for arbitrary and capricious interference, and continued political obstruction. Public Benefit definition: A project that primarily serves the general public—or a significant segment—by providing affordable housing, recreation, social, or community facilities and may be developed by a public agency, non-profit, or private entity that balances financial return with public good. Providing an alternative housing option through lower-cost RV housing meets that test. Opposition rhetoric mirrors the standard NIMBY playbook—unfounded claims of property-devaluation, speculative safety fears, and negative class-based stereotypes—none of which are relevant under LAMC § 14.00 A.7 or within the Council’s narrow § 245 review. Such prejudices carry no legal weight. Lets be clear here. Fundamentally, the opposition has nothing to do with compliance; it is rooted in the project’s very existence. Three determinations have reached the same conclusion: the RV park is a by-right, ministerial project that requires no CUP under City ordinances. Its permit is protected by that ministerial status. Opponents continue to misapprehend the scope of a ministerial appeal. An appeal of a ministerial permit can challenge only whether objective standards were misapplied. The ordinance itself, zoning classifications, or personal discomfort with the project’s existence are beyond the appeal’s limited jurisdiction. If opponents remain dissatisfied, their lawful avenue is to petition the courts to challenge the zoning provisions themselves—not to press Council for a fourth, politically biased reconsideration of a by-right permit. — Doug Ross