

## Communication from Public

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**Council File No:** 24-0711-S1

**Comments for Public Posting:** This document is being submitted into the record under Council Motion 57 to support PLUM Committee oversight. It details unresolved LADBS complaint closures and outlines how the RV park at 23416 S. President Avenue was constructed according to outdated electrical plans (Sheet P-4 from January 2024), which conflict with the revised Planning-approved site plan (Sheet P-1). This conflict resulted in multiple violations of Public Benefit Performance Standards under LAMC §14.00 A.7, including encroachments into required setbacks, the removal of ADA parking, and unpermitted increases in infrastructure. The attachment highlights a critical failure by LADBS to uphold its enforcement responsibilities. By approving and relying on conflicting plan sheets, despite clear zoning code violations and known discrepancies, LADBS enabled the construction of permanent infrastructure that fails to meet minimum standards. This breakdown in oversight not only undermines the integrity of the ministerial approval process but also sets a dangerous precedent for zoning compliance citywide. It affirms the urgent need for further review of LADBS enforcement actions and reinforces the necessity of using the Planning-approved, ministerial plan (P-1) as the sole basis for compliance in an R1 zone.

Subject: Request for Clarification on Complaint Closures – 23416 S. President Ave RV Park

Dear Kelly Warner,

I am writing to respectfully request clarification regarding the recent closure of multiple LADBS complaints I submitted related to the RV park project at 23416 S. President Avenue. As of August 1, 2025, four complaints were marked as “duplicate requests,” and one was referred to the Housing Department. However, each complaint addressed distinct, documentable violations of LAMC codes and Public Benefit Performance Standards under LAMC §14.00 A.7. Given the gravity and uniqueness of the issues raised, I am concerned these dismissals may have overlooked the substance of each filing. A summary is provided below for your review:

**1. Methane Mitigation Violation – Public Safety at Risk (Filed June 30)**

The project lies within the Wilmington Oil Field Methane Buffer Zone. Despite visible utility infrastructure on-site, including what appears to be an 800A methane-rated electrical system, LADBS records show no methane mitigation plan, methane gas test, or compliance review, as required under LAMC §91.7103 and Ordinance No. 175790. This poses a direct safety hazard and violates the law requiring LADBS inspection and LAFD clearance of methane mitigation systems prior to use or occupancy. Notably, Sheet P-4 of the approved plans explicitly labels the site as a “METHANE ZONE” and includes methane-rated electrical equipment and trenching systems, demonstrating that both the developer and LADBS acknowledged the methane risk. Furthermore, LADBS zoning records list ZI-1195 and ZI-2536, which trigger mandatory review protocols for methane and oil well proximity. Despite these clear warnings, LADBS approved electrical and site development without methane clearance from the LAFD or verified mitigation system, a severe failure in public safety enforcement.

A recent public records request from the LAFD's FIMS system confirms that no methane-related inspection or review was conducted under Permit No. H24-117156.

**2. Utility Islands Installed in Setback/Buffer Zone – Plan Conflict (Filed July 15)**

The utility islands were constructed according to Sheet P-4, which shows them within the 15-foot rear setback and 10-foot landscaped buffer, clearly violating Performance Standard #2. Sheet P-4 originates from the developer's January 2024 plan set, which matched the corresponding Sheet P-1 at that time. However, following Planning staff's identification of compliance issues in April, the developer submitted revised site plans on July 2, 2024, to reflect the required buffer zone. Despite this, the utility island pedestals had already been constructed by June 27, 2024, using the outdated January 2024 plans. Those earlier plans, including Sheet P-4, failed to include the 10-foot landscaped buffer, showed 49 utility pedestals, exceeding the 46 stalls authorized on P-1, and omitted ADA parking, collectively resulting in multiple violations of the Performance Standards, zoning, capacity, and accessibility requirements. LADBS nonetheless approved P-4 despite its direct conflict with the revised P-1, thereby enabling unpermitted encroachments and noncompliant construction. This is not a duplicate issue, but a distinct and serious example of plan conflict and zoning code violation that warrants formal investigation.

**3. ADA Parking Removed to Accommodate Oversized Utility Structure (Filed July 15)**

Sheet P-4 (January 2024) also shows an 800A Electric Distribution System installed within the

setback and landscaped buffer. Its size resulted in the removal of the ADA parking spaces originally shown on Sheet P-1. This constitutes a violation of both Performance Standard #8 and California Building Code Chapter 11B. LADBS approved the electric plan, allowing these incompatible uses and effectively facilitating non-compliance with ADA requirements.

#### **4. Landscaping Misrepresentation – City-Owned Trees Counted as On-Site (Filed July 21)**

Sheet P-1 claims compliance with Performance Standard #3 by listing ten crepe myrtle trees. However, these trees are located in the public parkway, not on the developer's private property. According to the Director of Planning's determination letter, "The project includes 10 crepe myrtle trees located in the parkway along President Avenue" (Director of Planning, p. 16). This misrepresents compliance with the 4% minimum on-site landscaping requirement under LAMC §14.00 A.7. Public Benefit Performance Standards require that qualifying landscaping be located within the project parcel boundaries, not in the public right-of-way. The use of city-owned trees to satisfy a private landscaping obligation is a zoning violation and renders the project noncompliant with Standard #3.

#### **5. Pedestal Count Discrepancy – Overbuilt Infrastructure (Filed July 25, Referred to Housing Dept)**

The Planning-approved site plan (P-1) authorizes only 46 RV stalls, meaning only 46 utility pedestals should have been shown on the corresponding electrical plans. However, Sheet P-4, originating from the January 2024 electrical plans and approved by LADBS, shows 49 utility pedestals, as confirmed by counting the 49 rectangular boxes on the layout, creating a clear conflict between the two approved documents. This overbuild raises infrastructure capacity and fire safety concerns and further supports that LADBS approved conflicting plans. I am unclear why this issue, which concerns LADBS-approved electrical infrastructure, was referred to the Housing Department. The increase in pedestal count is functionally an unauthorized expansion of the site's capacity and should have required a new discretionary review. By approving this overbuild, LADBS effectively permitted site expansion beyond the Planning-approved limit.

#### **LADBS Approval of Conflicting Plans**

According to the City Planning Department's sworn testimony (Declaration of Ruben Vasquez, July 10, 2024), Planning staff flagged concerns in April regarding noncompliance with Public Benefit Performance Standards, including the absence of a 10-foot landscaped buffer. The developer responded by submitting revised site plans on July 2, 2024, and July 25, 2024, to reflect the required buffer. However, by that point, June 27, 2024, the site regarding the utility island's pedestals had already been constructed using the January 2024 plans. Those earlier plans, including Sheet P-4, did not include the buffer, showed 49 utility pedestals, and omitted ADA parking.

It is unclear whether the utility plans were ever updated to match the July site plan revisions. But even if they were, the developer had already completed construction regarding the installation of the utility island pedestals by the time those corrections were submitted. Channel 7 news footage dated June 27, 2024, filmed immediately following the June 26 Council meeting, visibly confirms that the utility island pedestals had already been installed. This is clearly documented at the 27-second, 39-second, and 53-second marks of the broadcast. Screenshots and a link to the footage have been included for reference.

This sequencing matters. LADBS approved the January electrical layout before the corrected site plan revisions were applied across all sheets and after Planning had raised zoning compliance issues. By approving inconsistent documents, LADBS enabled the construction of infrastructure that violates multiple Performance Standards, zoning and safety standards, standards they were legally obligated to enforce.

#### Request for LADBS Clarification

Given these serious contradictions, I respectfully request the following:

- A written explanation of why recent complaints 28-31 were closed as duplicates when each raised a unique zoning or safety violation;
- A written explanation of why Complaint 32, which involves an LADBS-approved electrical plan and alleged overbuild, was referred to the Housing Department rather than investigated by LADBS;
- Clarification as to whether LADBS approved the electrical plan (Sheet P-4 from January 2024) knowing it conflicted with Planning's revised site plan;
- Confirmation of whether LADBS verified that the required 4% on-site landscaping is located on private property, and not in the public parkway;
- An update on the one referred complaint (#5), including which agency accepted it and why LADBS declined to investigate an inconsistency between plans it approved.
- Based on the above, I respectfully request that all five complaints be re-evaluated in light of the new information provided, and that LADBS reopen the investigations to ensure compliance with all applicable codes.

Finally, if this project proceeds in its current form, I respectfully ask: which plan sheet will LADBS use to enforce compliance, P-1, approved by Planning, or P-4, approved by LADBS? If the developer claims to have built according to an LADBS-approved plan, how will the department determine whether that construction is legally compliant? This is a critical question because P-1 is the only sheet associated with a ministerial Planning approval under LAMC §14.00 A.7. Any deviation from it, including reliance on conflicting LADBS-approved sheets like P-4, undermines the basis for ministerial approval and could void the developer's right to operate an RV park in an R1 zone. Ministerial approvals require strict compliance with all applicable standards, and only the Planning-approved P-1 reflects those standards. P-4, by contrast, was not reviewed through the public benefit framework and therefore cannot serve as the legal basis for entitlement in a residential zone.

Without resolution, the current approval structure opens the door to permanent noncompliance being codified through conflicting plan sheets.

I understand LADBS handles a large volume of complaints, but these issues merit a formal review, particularly when public safety, accessibility, and zoning integrity are at stake.

I have also copied Principal City Planner Phyllis Nathanson in this correspondence, given her leadership role in the oversight and interpretation of Public Benefit projects under LAMC §14.00 A.7 and the potential implications this case presents for ministerial zoning approvals citywide.

Thank you for your attention and I look forward to your reply.

Sincerely,  
Christal Cooper  
Harbor City Resident

cc: Tim McOsker, Council District 15  
cc: John Lee, Council District 12  
cc: Phyllis Nathanson, Principal City Planner, Department of City Planning  
cc: Anna Vidal, Department of City Planning  
cc: Ruben Vasquez, Department of City Planning  
cc: Amy Brothers, Deputy City Attorney  
cc: Eric Jakeman, Assistant Bureau Chief, Code Enforcement Bureau  
cc: Frank Lara, Chief of Code Enforcement Bureau