

Communication from Public

Name: Christal Cooper
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Council File No: 24-0711-S1
Comments for Public Posting: The LADBS report dated October 31, 2025 misapplies LAMC §12.22 A.2 by claiming that private utility islands and an 800-amp electrical system can be placed within the 10-foot landscaped buffer. This conflicts with LAMC §14.00 A.7(a)(5) and the CPC's October 9 findings, which require buffers to remain free of all structures and utilities.

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The LADBS report dated October 31, 2025 misapplies LAMC §12.22 A.2 by asserting that “structures for public-utility purposes” may encroach into required yard setbacks and landscaped buffers. This interpretation is legally untenable and factually inapplicable to the project at issue. Section 12.22 A.2 was written to accommodate limited installations by regulated public-utility agencies, such as the Los Angeles Department of Water and Power or Southern California Gas Company, not to grant exemptions to private commercial developers constructing on-site electrical systems for private use.

The utility islands and 800-amp electrical distribution system (approximately 36 ft × 24 ft, as shown on Plan P-4) exclusively serve a private RV park and do not qualify as public-utility infrastructure. Their placement within the 10-foot landscaped buffer constitutes a direct violation of Performance Standard #5 under LAMC §14.00 A.7, which mandates that such buffers remain *“free of all structures, paving, and utility infrastructure.”*

Further, page 14 of the CPC Recommendation Report (DIR-2024-7352-BSA-1A [REMAND]) explicitly confirms that the Zoning Administrator never reviewed the electrical plans, and any configuration inconsistent with approved Planning clearances **“would not be allowed.”** This establishes that LADBS lacks jurisdiction to unilaterally override the Department of City Planning’s zoning determinations or to reclassify private electrical systems as exempt “public-utility” structures.

LADBS’s interpretation not only conflicts with Planning’s authority but also undermines the City’s Public Benefit framework, allowing developers to treat required landscaped buffers as discretionary space. This creates an unsafe and inequitable precedent for all future projects regulated under LAMC §14.00 A.7, where buffers are intended to protect adjacent residential communities both visually and for safety.

For these reasons, I respectfully urge the PLUM Committee and City Council to:

1. Reaffirm the CPC’s binding finding that no utilities, structures, or paving may be located within the landscaped buffer;
2. Direct LADBS to revise its October 31, 2025 report to conform with LAMC §14.00 A.7 and the CPC clearance;
3. Require formal interdepartmental coordination between LADBS and the Department of City Planning to ensure consistent enforcement and procedural integrity; and
4. Incorporate this clarification into the official Council File record so that future reports and hearings reflect the correct zoning interpretation.