

Communication from Public

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Comments for Public Posting: The approved Harbor City site plan (Sheet P-1, stamped 8/1/2024 and dated 7/25/2024) contains an explicit note box stating that the project complies with “State of California Code of Regulations, Title 24” and “State of California Code of Regulations, Title 25, Division I, Chapter 2.” Yet on the very same sheet there are no restroom, shower, laundry, or service buildings shown anywhere, and no notation that all spaces are restricted to self-contained/independent RVs. Under 25 CCR §1002, every one of the 46 spaces is therefore legally presumed dependent. Dependent spaces trigger mandatory service buildings under 25 CCR §§1524, 1530, 1532, 2005, and 2106, including separate men’s and women’s toilets, showers, lavatories, laundry facilities, slop sinks, and accessible routes. The plan set also provides full sewer, water, and 50-amp electrical hookups at every space, and utility-island pedestals at each site, which confirms the park is designed for dependent RVs that rely on external sanitation infrastructure, not independent self-contained units. For a 46-space dependent RV park, these Title 25 requirements translate into a substantial service-building complex typically 1,200–1,600 square feet to accommodate men’s and women’s restrooms (3 toilets for men and 5 for women), at least 3 showers for each gender, multiple lavatories, an ADA-compliant stall and shower, a laundry room with required clearances, and a service sink, all connected by accessible routes. None of these required facilities appears on any approved plan sheet for Harbor City, Wilmington, or North Hills. The identical omission appears in the Wilmington and North Hills projects, and Wilmington is already operating without proper Title 25 service buildings, instead relying on unpermitted “Tuff Sheds” constructed under three voided LADBS permits. These facilities were not “forgotten” they were never included, allowing the developer to avoid one of the most expensive components of a Special Occupancy Park and to bypass full ADA/Title 24 scrutiny. Under 25 CCR §2005, required service buildings must be shown on the submitted plans and cannot be treated as an afterthought. When a building permit and ministerial clearance are issued for a park that omits mandatory Title 25 facilities, that permit is issued in error under LAMC §91.106.4 and is subject to immediate revocation under LAMC §98.0805. No lawful Certificate of Occupancy or Permit to

Operate may be issued while these violations exist, and Health & Safety Code §§18865 and 18871.3 authorize significant civil penalties for constructing or operating a noncompliant park. The PLUM Committee has already acknowledged LADBS error on Performance Standards 3–5 but has not yet confronted this far more fundamental Title 25 defect, which voids the entire ministerial basis for approval. In light of the repeated omissions across Harbor City, Wilmington, and North Hills, this is not an isolated mistake but a deliberate pattern of noncompliance. Council must sustain the appeal in full, direct LADBS to revoke the erroneous permit, require discretionary CUP/CEQA review, and terminate this project rather than reward a documented pattern of violations.