

Communication from Public

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Comments for Public Posting: The California Department of Housing and Community Development (HCD) has opened three active Title 25 enforcement investigations into RV parks proposed or constructed by the same applicant (Silver Ocean LLC / “11 RV Parks”): Harbor City (MP-C-25-06823), Wilmington (MP-C-25-06825), and North Hills (MP-C-25-06826). In Wilmington, the park has been operating since 2023 relying solely on temporary modular restroom and laundry trailers; no permanent, code-compliant Title 25 service building on a foundation was ever shown on the approved plans or constructed. In Harbor City and North Hills, the projects have been fully built, yet LADBS has not issued Certificates of Occupancy. Across all three sites, HCD is now investigating an identical pattern of violations: approved plans and built conditions that omit the permanent restroom, shower, and laundry buildings and ADA-accessible routes required under the Mobilehome Parks Act, while utility islands, electrical pedestals, and other structures have been placed inside required setbacks and buffers in direct violation of Title 25 and of Performance Standard #5 under LAMC §14.00 A.7. This is not an isolated oversight. It is a repeated, systemic failure by the same applicant across three Council Districts and a clear demonstration that the ministerial “public benefit” approval pathway is incapable of ensuring even basic compliance with state health-and-safety law. Proceeding with ministerial approval while three active HCD enforcement cases remain unresolved and while one site is already operating with non-compliant temporary facilities would knowingly place the City of Los Angeles in conflict with state law, invite significant legal and financial liability, and undermine HCD’s ability to enforce Title 25 anywhere in California. For these reasons, I strongly urge the City Council to stand with Councilmember Tim McOsker and the residents of the 15th District, sustain his valid assertion of jurisdiction under LAMC §245, and remand both the Harbor City (24-0711-S1) and North Hills projects to a full Conditional Use Permit process. Only a discretionary CUP with public hearings, enforceable conditions of approval, and proper CEQA review can compel the applicant to construct the permanent facilities state law requires and ensure that Harbor City, Wilmington, North Hills, and every future neighborhood receive the protection and accountability the

ministerial process failed to provide. Thank you for protecting public health and upholding the rule of law.