

## Communication from Public

**Name:** Harbor City Resident

**Date Submitted:** 07/27/2025 08:49 PM

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

**Comments for Public Posting:** I fully support Tim McOscar's motion to have this project and entire situation fully reviewed, specifically an in-person and fully transparent review of the site in question. I pledge my support based on the evidence that has been pushed forward that the site in question has been found to be in violation of multiple rules, laws, and by-laws that the city is supposed to be upholding. It is unfortunate that this even needs to be submitted but after reviewing what information has become available at recent meetings and appeals regarding this property, it is now obvious that only a full in person review by an inspector is necessary with full documentation of what is wrong with this site and how it is not properly fulfilling the "Public Benefit" status that has been bestowed upon it. This general abuse of such a term is appalling, especially as further evidence from concerned residents has shown that documentation by the applicant for this "Public Benefit" status has been nothing but a sham. Paperwork showing space that was set aside, when in truth has already been removed or has structures already in place blocking it (ADA Parking and Regular Parking). This being such a flagrant disregard for the rules is already bothersome, but it is made worse by the fact that this information being brought forward at other meetings is dismissed, bringing me to believe that no one wants to do anything to combat this act of corruption because they don't care about the neighborhoods they are leaving this with. In fact, the disregard for this flagrant act of either corruption, misrepresentation, or outright lawlessness is so open that plans submitted for the site in Harbor City had dimensions removed from the planning of the site, meaning that right now even I could not tell you how much space is being used by this park, and neither could the city unless they plan on referencing old plans and just hoping that things are the same. Which if that is how the city is going to be handling paperwork going forward, then anyone can submit changes after they get approval for anything and not worry about the legal issues. In fact, the entire process that I have seen this site go through indicates that it is profitable to outright lie to the city through documentation as it appears there are no consequences for doing so even if they are caught afterwards. Furthermore, it has been noted that LADBS has just simply ignored the entire situation, closing out a collection of

complaints about the area and seeming to dismiss any and all problems that are being brought up. This leads me to just simply believe that at this point there is no reason to believe the law will possibly be followed, because those who are supposed to enforce or inspect have abandoned their duties and responsibilities. Whether this is due to simple neglect, or just outright corruption I couldn't say, but this situation makes it increasingly clear that everyone seems to be fine with waiting until the entire situation blows up to do something, and by then it will be far too late to do corrections as everyone will have settled into this lawbreaking, and have gotten complacent in letting it happen. Violations of LAMC §14.00 A.7(8), from Landscaping buffers to spacing buffers to drive aisle violations. I have heard that none of this needs to be addressed until "final inspections" but at this point with how many complaints with pictures and documentation showing violations, it makes me wonder what is the point of any reporting system when it can simply be deferred until everything is done. The point of having a system to report violations BEFORE a site becomes open and active is to address violations, lawbreaking, violations of Titles, and general issues. If the only time it can be addressed is at the very end, then there is no point to any reports and you truly can just lie on the paperwork and get approval for anything. A very dangerous precedent. Ultimately, I am also going to attach a file memo which I believe was already submitted by others who are a bit more specific with the violations already found and rules being broken. I hope that this motion going through shall finally bring some proper inspections and documentation to this situation, and for those who have been outright deceiving or otherwise submitted paperwork with dishonest intent to be brought to answer for this lawlessness. If none of this is noted as has been shown to be happening before, it just indicates that some practices are just allowed to break the rules, and will be precedent moving forward for all residents around Harbor City as this situation seems to be rather public. I hope it doesn't become a showing of that.

**June 26, 2025**

To: City Planning Commission: Case Number: DIR-2024-7352-BSA

From: Christal Cooper – Community Advocate, Harbor City CA

Subject: Preface to Attached Memos & Flyers – Violations and Public Harm at 23416 President Avenue RV Park

Dear Commissioners,

Enclosed is a series of fourteen memos and accompanying documentation prepared by residents of Harbor City concerning the RV park development at 23416 President Avenue. Each memo outlines specific, documented violations of the Los Angeles Municipal Code (LAMC), building regulations, and Public Benefit Performance Standards under **LAMC §14.00 A.7**. These memos are paired with visual flyers to provide accessible, evidence-based summaries for your review.

What you are about to read is not a collection of minor grievances. These are serious, coordinated misrepresentations and structural violations that collectively disqualify this development from its current entitlements and Public Benefit status. The violations are not speculative, they are visible, measurable, and in many cases, already built in defiance of approved plans.

**Throughout the fourteen memos, you will find evidence of:**

- False plan submissions and omitted measurements used to evade proper code review
- Unauthorized RV expansion, increasing the total from 46 to 54 stalls without approval
- Encroachment into required buffer zones intended to protect surrounding homes
- Construction of unpermitted structures, including prefabricated buildings not shown on any approved plans
- Manipulation and reduction of ADA parking, compromising both accessibility and legal compliance
- Violation of Title 25 spacing and occupancy limits, including illegal stall dimensions and insufficient separation between RV units
- Neglect of required landscaping, substandard fencing, and persistent graffiti all degrading neighborhood safety and character
- Deliberate omission of RV stall dimensions.
- Some drive aisles were constructed below the legal minimum width, in clear violation of municipal code requirements
- Repeated inaction by LADBS, despite multiple community complaints and visible, documented violations

These violations reflect not just developer misconduct but a troubling failure of oversight. The LADBS approved plans do not match what was built. Key conditions of approved plans were disregarded. Legal standards were bypassed, and no Conditional Use Permit was sought despite known ambiguity.

The Planning Commission now has the opportunity and responsibility to intervene where enforcement failed. Each memo respectfully requests one or more of the following:

1. **Permit revocation**
2. **Disqualification from Public Benefit zoning status**
3. **Referral to the City Attorney for further investigation**
4. **Comprehensive enforcement of zoning regulations and community protections**

This packet is structured to be concise yet comprehensive. Each memo stands on its own, but together they tell a larger story: one of manipulation, avoidance, and harm.

We thank you for your time, and for your willingness to listen to the community voice that has fought hard to bring these truths to light.

## **Memo #1 Subject: Repeated Architectural Plan Manipulation and Missing Measurements - RV Park at 23416 President Avenue**

**Summary:** This memo supports revoking the permits issued for the RV park at 23416 President Avenue, based on documented evidence of architectural plan manipulation, missing measurements, and non-compliance with LAMC §12.21 and related zoning requirements.

### **Key Violations and Findings:**

#### **Conflicting Plan Sets and Deleted Information:**

- January 7, 2024 Plan: RV stall sizes (20'×37' and 20'×40') were buried in the Notes section, not shown on the layout itself. This obscured compliance with setbacks and buffer zones, limiting transparency and hindering code review.
- July 2, 2024 Plan: Reduced the RV count to 39, omitting rear stall depths, demonstrating the originally proposed 46-stall layout was unfeasible under zoning constraints.
- July 25, 2024 Plan (Approved): The revised and approved plans indicate a total of 46 RV stalls; however, individual RV stall dimensions were omitted, and 47 RV stalls were ultimately constructed. Additionally, the plans omitted the footprint measurements and locations of both the electric distribution panels and the methane gas mitigation equipment, both of which have been installed within the area originally designated for ADA parking.

#### **Rear Stall Depth Violates Code and Is Infeasible Within Actual Lot Dimensions**

- All plans omit the physical layout of rear stall dimensions. One note claims rear lots are 20'×40', but this is physically impossible based on physical lot size constraints.
  - The required 15-foot rear buffer and 18-foot ADA space consume 33 feet.
  - A 40-foot RV stall would intrude into the roadway and buffer zone violating LAMC §12.21 A.5(e).

#### **Missing Critical Measurements and ADA Obstruction:**

- All plan sets fail to show accurate measurements for RV stalls and utilities infrastructure.
- Field verification shows an utilities infrastructure built within the ADA stall and 15-foot buffer zone, effectively violating ADA access and landscaping standards.
- The electrical and methane infrastructure measurements are not shown on any approved plan.

#### **Violations of LAMC:**

- LAMC §12.21 A.1(a): Requires all uses and structures to conform to zoning code. The missing and misleading measurements violate this section.
- LAMC §91.106.4.1: Requires complete plan documentation for all permitted construction.
- LAMC §14.00 A.7: Requires full compliance with Performance Standards for Public Benefit projects including buffers, access, and landscaping, which cannot be verified without complete dimensions.

#### **Pattern of Misrepresentation – Grounds for City Attorney Referral:**

- The deletion of key dimensions across plan sets, combined with early construction of utility island units, shows intent to bypass plan review and conceal noncompliance.
- This may constitute violations of LAMC §§91.0106 and 98.0403, involving misrepresentation of material facts.
- These actions merit referral to the City Attorney for investigation into potential fraud and abuse of the permitting process.

### **Conclusion:**

The cumulative omissions, plan alterations, and lack of utility disclosures undermine zoning integrity and public trust. LADBS approved flawed plans lacking required data, representing a breakdown in enforcement.

### **Requested Actions:**

- Revoke all permits for this project.
- Refer the case to the City Attorney's Office for investigation.
- Affirm that deceptive architectural submissions have no place in Public Benefit zoning.

## **Memo #2 Subject: Fence Violation at 23416 President Avenue –**

### **Noncompliance with Performance Standard #3**

This memo is submitted to document a clear violation of LAMC §14.00 A.7, Performance Standard #3, which requires an 8-foot perimeter fence of masonry or wrought iron for all Public Benefit projects in residential zones.

#### **Violation Summary:**

- As Approved: The developer submitted and received approval for plans showing a full 8-foot wrought iron or masonry fence surrounding the property, in compliance with LAMC §14.00 A.7(3).
- As Built: Instead of installing the required fencing, the developer left the existing chain-link fence along the rear property line, topped with barbed wire, a material explicitly inconsistent with residential standards and a direct contradiction of the approved architectural plans.

#### **Applicable Code Requirements:**

- LAMC §14.00 A.7(3) – *Fencing and Screening Standard*: Requires that “the site shall be enclosed with an 8-foot-high solid decorative masonry wall or wrought iron fence unless otherwise approved.”
- LAMC §91.106.4.1 – Requires that permitted construction match the submitted and approved plans.
- LAMC §12.21 A.1(a) – Prohibits the use or maintenance of any structure in violation of zoning or permit requirements.

#### **Pattern of Noncompliance:**

This is not an isolated incident. The same developer previously demolished a compliant perimeter wall at his Wilmington RV site and replaced it with barbed wire-topped chain-link fencing, again in direct violation of Performance Standard #3. This establishes a deliberate and repeated pattern of undermining residential protections and city oversight.

#### **Why This Is Not Just an Enforcement Issue:**

This is not a minor or correctable field violation, it is a direct violation of a mandatory Performance Standard under LAMC §14.00 A.7. Compliance with all twelve Performance Standards is a condition of eligibility for Public Benefit status. Failure to meet even one standard, such as Performance Standard #3, automatically disqualifies the project.

If the developer intends to proceed without meeting Performance Standard #3, they are legally required to obtain a Conditional Use Permit (CUP) pursuant to LAMC §12.24 U.14. No such CUP has been applied for or granted. Therefore, the current project lacks the legal entitlement to operate under the Public Benefit exemption.

#### **Requested Action: We respectfully request that the City Planning Commission:**

- Revoke the project’s Public Benefit status and associated permits, and
- Refer the matter to LADBS and, if appropriate, the City Attorney for misrepresentation of approved construction documents.

When conditions of approval are ignored and enforcement fails, it becomes the CPC’s responsibility to uphold the law and protect the community

### **Memo 3: Subject: LADBS and Zoning Administrator erred in applying prevailing setback and violated LAMC §14.00 A.7 Performance Standard #4**

**Summary:** The developer of the RV park at 23416 President Avenue was granted a permit based on a flawed front yard setback calculation. The approval violates Los Angeles Municipal Code (“LAMC”) §14.00 A.7, specifically Performance Standard #4, which unambiguously requires that the front yard setback be at least as deep as that required by the underlying zone (R1 = 20 feet).

The Zoning Administrator improperly applied the Prevailing Setback Calculator, which is designed for conventional R1 projects under LAMC §12.08, not public benefit projects under §14.00 A.7. This misapplication allowed an illegal 17.69-foot setback, violating the fixed 20-foot requirement and undermining the purpose of Performance Standard #4.

#### **Relevant Code Provisions:**

- LAMC §14.00 A.7 (e) (Performance Standard #4): "The front yard setback is at least as deep as the setback required by the zone."
- LAMC §12.08 C.1 (R1 Zone): "The required front yard shall be not less than 20 feet in depth."
- LAMC §12.08 C.2 (Prevailing Setback Exception): This section allows for adjusted setbacks only under specific single-family development circumstances, and only when calculations are based on contiguous lots with valid measurements. It does not apply to public benefit projects processed under §14.00 A.7.
- LAMC §91.106.4.1: All permitted structures must reflect approved plans, and any deviation constitutes a code violation unless re-reviewed and re-approved.

#### **Violations and Administrative Errors:**

1. Use of the Prevailing Setback Calculator was improper.
  - The Prevailing Setback Calculator is not authorized for use under the public benefit Performance Standards. It is designed for basic R1 construction and cannot override fixed setbacks under §14.00 A.7.
2. The minimum 20-foot setback was not met.
  - The project was constructed with a front setback of only 17.69 feet, despite the approved plans showing the required 20-foot setback.
  - The Zoning Administrator improperly applied the Prevailing Setback Calculator, resulting in an inaccurate determination of a compliant setback. Even the Director of Planning’s own appeal report identifies a prevailing setback of only 18.20 feet, below the required 20-foot minimum, thereby confirming the project’s noncompliance with LAMC setback standards.
3. The parcel data used to calculate setback was false and misleading.
  - The developer relied on three unrelated parcels totaling only 26,442 square feet, not the actual 53,990 square feet of the subject property (APNs 7438-003-035 and 7438-003-036). This misrepresentation directly affected the outcome of the setback calculation.
4. LADBS failed to verify setback using certified parcel boundaries.
  - The Zoning Administrator used approximate ZIMAS tools instead of legally recorded parcel maps.
  - This violates LADBS's duty to verify data accuracy before permit approval.

**Conclusion and Requested Action:** This case represents a textbook example of zoning manipulation and administrative failure. The developer received approval for a setback deviation that violates fixed code standards, despite not applying for, nor being granted, a formal variance. This was accomplished by misusing tools, such as the Prevailing Setback Calculator, that do not legally apply to public benefit projects. Allowing this approval to stand would undermine the integrity of LAMC §14.00 A.7 and open the door to citywide abuse.

We respectfully urge the City Planning Commission to:

- Revoke the project’s permit for violation of Performance Standard #4;
- Direct LADBS to review setback compliance using legal parcel maps and enforce the 20-foot minimum setback;
- Establish a formal policy clarifying that the Prevailing Setback Calculator does not apply to public benefit projects

**Memo #4 Subject:** RV Park at 23416 President Avenue – Failure to Comply with Mandatory Landscaping Buffer and Parking Standards

**Summary:** The developer at 23416 President Avenue has violated multiple zoning ordinances and performance standards governing public benefit projects in R1 zones, specifically Performance Standard #5 (landscape buffer) and Performance Standard #9 (parking requirements) under LAMC §14.00 A.7. These violations are not isolated enforcement issues, they reflect a systemic, intentional evasion of city code, and therefore warrant permit revocation.

**Legal Standards and Violations:**

1. LAMC §14.00 A.7(e)(5): “The property is improved with a ten-foot landscaped buffer along the periphery of the property, which is maintained and is equipped with an automatic irrigation system.”
  - Violation: No landscaped buffer or irrigation exists on-site. Utility island hookups and RV stalls are encroaching directly into the required buffer zones. Prefab structures (most likely bathrooms/laundry) have been placed where landscaping is mandated.
2. LAMC §14.00 A.7(e)(9): “The use meets the parking requirements of Section 12.21 A.”
  - Violation: The RV park has not provided sufficient off-street parking. RVs are situated side-by-side with no adjacent vehicle spaces. Residents will be forced to park on neighborhood streets or block emergency access.
  - LAMC §12.21 A.6: Requires areas developed as public parking be landscaped; no such improvements have been made.
3. LAMC §91.106.4.1: Requires that all permitted improvements match approved plans. Deviations without review or permit approval are unlawful.
  - Violation: None of the additional prefab structures are shown on the approved plans. Their construction violates permit terms.

**Why This Warrants Permit Revocation (Not Just Enforcement):**

- The buffer zone was explicitly shown on approved plans. Its removal is not a compliance oversight; it is a material breach of a mandated condition.
- LADBS approved this project under the assumption that all 12 performance standards would be met. Failure to meet even one disqualifies the project from public benefit eligibility.
- LAMC §14.00 A.7 mandates that public benefit uses meet ALL applicable standards. There is no discretion to waive them retroactively.
- CPC has both the authority and responsibility to revoke permits where approvals were granted on misrepresentations or post-approval noncompliance.

**Conclusion and Recommendation:**

This developer has disregarded required landscaping, parking standards, and permit conditions. LADBS’s failure to enforce during construction does not absolve the applicant’s obligation to comply with the law. We respectfully request the City Planning Commission:

- Revoke the project’s permit for violating Performance Standards #5 and #9;
- Issue formal direction to LADBS to enforce zoning setbacks and buffer zones;
- Clarify that Performance Standards under §14.00 A.7 are mandatory, not optional.

**Memo #5 Subject: RV Park at 23416 President Avenue - Failure to Provide Required Landscaping and Misuse of Title 25 Exemption (2 pages)**

**Summary:** The developer of the RV park at 23416 President Avenue has failed to comply with Performance Standard #6 and Performance Standard #9 under LAMC §14.00 A.7, which applies to all public benefit projects in R1 zones. These violations include the complete failure to install required landscaping in parking areas and buffer zones, and the misuse of state regulations under Title 25 of the California Code of Regulations to falsely claim exemption from local zoning and parking requirements.

In addition to landscaping violations, the developer has improperly asserted that the site qualifies as a mobile home park under Title 25 to bypass local standards. However, the site is occupied exclusively by DMV-registered recreational vehicles, not HCD-certified mobile homes, and therefore does not qualify as a mobile home park. This project falls under the category of a Special Occupancy Park (SOP) and remains fully subject to local zoning regulations, including all twelve Performance Standards under LAMC §14.00 A.7.

These are not minor omissions; they are material violations and misrepresentations that undermine the public benefit entitlement and warrant revocation of all permits and designations issued for the site.

**Legal Standards and Violations:**

LAMC §14.00 A.7(e)(6): “Parking areas are landscaped pursuant to the requirements of Section 12.21 A.6.”

LAMC §12.21 A.6(a): Requires that at least 4% of a parking area be landscaped with trees, shrubs, and groundcover to reduce heat and preserve neighborhood character.

- Violation: Approved plans required installation of 60 creeping phlox, 58 barberry plants, 18 olive trees, and 36 Mediterranean cypress trees. None were planted. Instead, only 8 King Alexander Palms were installed.
- The front, side, and rear buffer zones were stripped and replaced with utility island hookups and hardscape, in direct violation of Performance Standard #6 and the approved site plan. No revised plans or LADBS approval were submitted for these alterations.

LAMC §14.00 A.7(e)(9): “The use meets the parking requirements of Section 12.21 A.”

- Violation: The project provides no designated on-site parking for passenger vehicles, forcing residents to park on public streets and block internal roadways, creating unsafe conditions and violating LAMC §14.00 A.7(e)(9).
- The developer wrongly claims an exemption under Title 25, which applies only to state-licensed mobile home parks. This is a misapplication of the law, as local zoning regulations including LAMC §§12.21 A and 14.00 A.7 still govern this RV park.

**Title 25 Argument Refuted:**

The developer claims Title 25 exempts the project from local zoning standards, including landscaping and parking requirements. This is factually and legally incorrect.

- Title 25 of the California Code of Regulations governs mobilehome parks and Special Occupancy Parks (SOPs), including RV parks. However, its scope is limited to health and safety standards; it does not regulate zoning, establish parking requirements, or override local land use laws.
- This site will be occupied by recreational vehicles registered with the DMV, not HUD-certified mobile homes or HCD-permitted mobile home park structures.
- RV parks are governed by Title 25 as a Special Occupancy Park (SOP), but land use and zoning oversight remain under the jurisdiction of the City of Los Angeles.

Unless the site is a validly licensed HCD mobilehome park with long-term residential use and certified mobile homes, Title 25 does not override LAMC zoning requirements for RV Parks. The City retains full jurisdiction to enforce all Performance Standards under LAMC §14.00 A.7.



**Why This Warrants Permit Revocation (Not Just Enforcement):**

- Public Benefit projects must comply with all twelve Performance Standards under LAMC §14.00 A.7 to retain their designation.
- There is no legal mechanism to retroactively waive or modify these standards without revoking the Public Benefit status.
- The developer materially misrepresented landscaping and parking elements on approved plans.
- LADBS failed to conduct proper inspections or verify compliance during construction.
- These violations compromise environmental goals, neighborhood character, heat mitigation, and emergency access protections.
- The claim of Title 25 exemption is a strategic misrepresentation, not a legitimate legal defense.

**Conclusion and Recommendation:**

The developer at 23416 President Avenue has committed multiple violations that disqualify the project from Public Benefit eligibility and warrant immediate corrective action. Specifically, the developer has:

- Violated LAMC §14.00 A.7, including noncompliance with mandatory Performance Standards #6 (Landscaping) and #9 (Infrastructure);
- Failed to install required on-site landscaping and vehicle parking, both of which are essential conditions for approval;
- Misapplied Title 25 in an attempt to evade local zoning and land use regulations; and
- The developer installed key infrastructure including electrical and methane systems without providing required measurements or location on plans.

We respectfully urge the City Planning Commission to revoke the project's permits, enforce compliance with all applicable standards, and uphold the integrity of the Public Benefit process under LAMC §14.00 A.7.

**Requested Actions:**

1. Revoke the project's Public Benefit designation and all permits granted under LAMC §14.00 A.7.
2. Direct LADBS to issue formal Notices of Violation and pursue enforcement.
3. Affirm that Title 25 does not override LAMC for RV parks unless operating as a valid HCD-licensed mobile home park.
4. Require full compliance with landscaping and parking standards under LAMC §12.21 A.6 and §14.00 A.7.

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**Memo #6 Subject: Failure to Maintain Clean Premises – Violation of LAMC §14.00 A.7(8) at 23416 President Avenue**

This memo documents the failure of the developer at 23416 President Avenue to meet the mandatory cleanliness and maintenance obligations required under Performance Standard #8 of Los Angeles Municipal Code (LAMC) §14.00 A.7, applicable to Public Benefit projects in R1 zones.

**Violation Summary:**

- **Observed Condition:** Graffiti is present on the tarp covered chain-link fence at the rear of the property and has not been removed. This condition was photographed and verified while the site was still under construction and before occupancy.
- **Applicable Law:**  
LAMC §14.00 A.7(8) requires that all properties developed under Public Benefit provisions “be maintained free of graffiti, debris, and other signs of neglect” as part of ongoing compliance with performance standards.
- **Public Impact:** The presence of graffiti during early site development signals a clear disregard for long-term maintenance, undermining the intent of the ordinance and lowering the visual quality of the surrounding residential neighborhood. The failure to uphold this baseline standard raises concern over the future condition of the property and its compatibility with the R1 zone.

**Enforcement and Revocation Justification:**

This is not merely an enforcement issue, it is a breach of a required condition of development. Under LAMC §14.00 A.7, failure to meet any Performance Standard such as #8 on cleanliness renders the project noncompliant and ineligible for Public Benefit zoning treatment. The proper remedy is not a warning or future correction, it is revocation of the granted permit unless the project obtains a Conditional Use Permit under LAMC §12.24 U.14, which this developer never sought.

The Commission must interpret this failure not in isolation but as part of a broader pattern of disregard for zoning protections and community standards. When basic cleanliness standards are violated before occupancy, it signals a troubling trajectory of neglect and noncompliance.

**Requested Action:**

We respectfully urge the Commission to revoke the project’s Public Benefit status and associated permits under LAMC §14.00 A.7. The project has already failed its first basic test of responsibility, clean and safe maintenance of the premises, and should not be allowed to proceed further in an R1 neighborhood.

## **Memo # 7 Subject: RV Park Removal of Required Parking and Title 25 Misuse**

**Summary:** The developer of the property at 23416 President Avenue removed all on-site parking from the final project plans after obtaining permits, in direct violation of Performance Standard #9 under LAMC §14.00 A.7. This standard mandates full compliance with the parking requirements outlined in LAMC §12.21 A. To justify the elimination of required parking, the developer falsely invoked a Title 25 exemption. However, this exemption applies exclusively to mobile home parks; not to Special Occupancy Parks, such as the RV park proposed in this project. Title 25 regulates only health and safety standards for RV parks; it does not govern zoning, dictate parking requirements, or supersede local land use laws. Furthermore, the project includes no HCD-certified mobile homes and lacks a valid HCD mobile home park license, rendering any Title 25 exemption claim invalid. This misrepresentation constitutes a bait-and-switch tactic that undermines the project's public benefit designation and warrants the immediate revocation of its permit.

### **Legal Standards and Violations:**

1. LAMC §14.00 A.7(e)(9): "The use meets the parking requirements of Section 12.21 A."
2. LAMC §12.21 A.4 and A.6: Establishes parking and landscaping minimums for all developments unless expressly exempted.
  - Violation: The developer's original plans provided one passenger vehicle parking space per RV stall. These parking spaces were removed in later plan sets without review or justification. RVs now occupy the entire site with no legal on-site parking, in violation of Performance Standard #9.
3. LAMC §12.24 U.14: Requires a Conditional Use Permit when ambiguity or nonconformance exists in a proposed use.
  - Violation: The developer removed required on-site parking and failed to meet minimum provisions under LAMC §12.21 A, yet never applied for a Conditional Use Permit as required by §12.24 U.14. This reflects an intentional effort to bypass zoning review.
4. Misuse of Title 25 (California Code of Regulations): Title 25 exemptions apply solely to certified mobilehome parks regulated by the California Department of Housing and Community Development (HCD).
  - Violation: This site will contain DMV-registered RVs without tie-downs, permanent foundations, or fixed utility infrastructure. It does not meet the legal definition of a mobilehome park and therefore cannot invoke Title 25 exemptions to avoid compliance with LAMC parking standards.

### **Why This Warrants Permit Revocation (Not Just Enforcement):**

- The original permit was granted based on plans showing full parking compliance. Its removal invalidates the basis of approval.
- Public Benefit projects must meet all 12 Performance Standards to retain eligibility. Removal of any required element nullifies the project's legal status under LAMC §14.00 A.7.
- Allowing retroactive exemption circumvents both community review and legal due process, setting a dangerous precedent for zoning abuse.

### **Conclusion and Recommendation:**

This developer misrepresented the nature and scope of the project after obtaining approval, removed required parking without legal justification, and falsely invoked Title 25 to dodge local laws. The result is an unpermitted, non-compliant use in an R1 neighborhood, with no lawful parking or traffic safety mitigation. We respectfully request the City Planning Commission:

- Revoke the project's permit for violating Performance Standard #9;
- Direct LADBS to initiate enforcement for illegal plan alterations;
- Reaffirm that RV parks must comply with all relevant provisions of LAMC §12.21 and cannot rely on inapplicable mobilehome exemptions.

**Memo #8 Subject: RV Park at 23416 President Avenue – Removal of ADA Parking and Violation of Civil Rights Protections (2 pages)**

**Summary:** The removal of ADA-compliant parking at the RV park located at 23416 President Avenue constitutes a direct violation of federal and local accessibility laws, including LAMC §14.00 A.7, the California Building Code (CBC), and the Americans with Disabilities Act (ADA). While two ADA parking stalls were originally included in the approved plans, the developer later eliminated them without formal revision or approval and installed methane-rated electrical infrastructure in the same location. Though the methane and electrical structures appeared in the first set of stamped plans, it was buried on page 4 in small font and was not included in the site layout or labeled with any dimensions or measured placement, a procedural violation that concealed its true impact on site compliance. This act is both discriminatory and deceptive, as it effectively denies access to disabled individuals and disqualifies the project from Public Benefit status.

**Physical Constraints Proving Noncompliance:**

- The total depth from the rear fence to the drive aisle measures 33 feet, which previously accommodated a layout consisting of a 15-foot rear landscape buffer and an 18-foot-deep ADA-compliant parking stall (15' + 18' = 33').
- The newly installed methane-rated electrical enclosure is approximately 20 feet deep and setback approximately 5 feet from the rear fence, consuming two-thirds of the 33-foot zone.
- This leaves approximately 8 feet of depth between the front of the utility structure and the drive aisle; significantly less than the 18 feet required to accommodate an ADA-compliant parking stall.
- Despite this, the developer now claims that ADA parking will be reinstated in front of the electrical enclosure, a claim that is physically impossible due to available space, and highlights a willful misrepresentation of future compliance.

**Unpermitted and Undisclosed Infrastructure:**

The installed infrastructure includes: A methane-sensitive electrical service panel;

- Although the structure appears on the first set of stamped plans, it was built without measured placement or dimensioned labeling, in violation of LAMC §91.106.4.1, which requires clear, accurate, and complete plans for all permitted construction. The plans approved by LADBS lacked any measurements or specific location for the electrical/methane infrastructure, rendering the approval procedurally invalid and unenforceable.
- Constructed within the designated footprint of a required ADA parking stall and landscaped buffer, the installation violates both spatial and functional requirements under multiple code provisions.

**Legal Standards and Violations:**

- LAMC §14.00 A.7(e)(9): Requires compliance with LAMC §12.21 A, which incorporates ADA and CBC parking requirements.
- LAMC §12.21 A: Requires all public-serving uses to maintain accessible parking under CBC and federal ADA standards.
- CBC Chapter 11B: Requires a minimum number of accessible stalls for public-serving sites, including temporary RV parks.
- ADA Title III: Prohibits discrimination by public accommodations. The removal and physical obstruction of ADA parking constitutes exclusion by design.
- LAMC §91.106.4.1: Prohibits construction or use of unapproved structures not shown on stamped plans.

**Why This Warrants Permit Revocation (Not Just Enforcement):**

- The removal of ADA parking, combined with the installation of unauthorized methane-sensitive electrical equipment, violates:
  - LAMC Performance Standard #9,
  - Federal ADA access laws, and
  - Local safety and zoning regulations.

- There is no remaining physical space to reintroduce ADA parking, due to the encroachment of the 20-foot structure into the 33-foot zone.
- This is not an isolated error: A similar ADA stall violation occurred at another project by the same developer in Wilmington, showing a pattern of disregard for accessibility and legal compliance.
- LADBS failed to catch or enforce these violations, compounding the harm and forcing community members to defend their rights without institutional support.

**Conclusion and Recommendation:**

There is no Public Benefit when a project physically excludes people with disabilities and undermines basic life safety requirements. The removal of ADA parking, the unpermitted installation of critical infrastructure, and the ongoing misrepresentation of compliance justify full permit revocation.

We respectfully request that the City Planning Commission:

- Revoke the project's permits for violating ADA, CBC, and LAMC regulations;
- Direct LADBS to issue enforcement actions for construction and plan violations;
- Declare the project ineligible for Public Benefit status under LAMC §14.00 A.7;
- Set a precedent that disabled access and life safety are not negotiable in any land use decision.

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## **Memo #9 Why This Warrants Permit Revocation (Not Just Enforcement)**

### **Subject: RV Park at 23416 President Avenue - Drive Aisle Width Noncompliance and Public Safety Risks**

**Summary:** The RV park at 23416 President Avenue violates Performance Standard #9 under LAMC §14.00 A.7, as multiple drive aisles within the site measure only 15 feet wide, well below both the 19-foot legal minimum under LAMC §12.21 A.5(e)(2) and the 24-foot fire safety recommendation for two-way vehicular access. These dangerously narrow lanes put residents, emergency responders, and neighborhood traffic safety at risk and are the result of deliberate plan manipulation. This violation disqualifies the project from retaining its Public Benefit status and requires permit revocation.

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### **Legal Standards and Violations:**

1. LAMC §14.00 A.7(e)(9): "The use meets the parking requirements of Section 12.21 A."
2. LAMC §12.21 A.5(e)(2): "When access driveways serve more than 25 automobiles, each driveway shall be at least 19 feet in width, or two one-way driveways, each at least 10 feet wide, shall be provided."
  - Violation: This site serves 46 RVs and includes only one main drive aisle. Each interior aisle must meet the 19-foot minimum. However, multiple interior aisles are only 15 feet wide, and the main aisle is just 22 feet, short of both the 24-foot fire safety guideline and zoning standards.
  - Three of these 15-foot aisles serve eight RV stalls and terminate at a dead-end fence, meaning vehicles must both enter and exit along the same narrow path. This clearly constitutes a two-way traffic lane and fails to meet the minimum fire lane and access standards.
3. Fire Code Standards (Reference: LAFD Access Requirements):
  - Typically require 24 feet for two-way emergency vehicle access.
  - Violation: The site plan fails to meet this width on any interior road segment, creating access hazards.
4. LAMC §91.106.4.1: Requires construction to follow approved plans or obtain amended permits.
  - Violation: Developer deleted all stall dimensions in the final submitted plan set, likely to conceal noncompliant aisle widths and avoid detection by LADBS.
  - This was not a minor oversight; it was a calculated effort to hide safety and zoning violations.
  - Public Benefit projects must meet all 12 Performance Standards. Failure to comply with Performance Standard #9 voids this eligibility.
  - LADBS failed to identify or correct this violation, which makes CPC oversight essential to uphold code integrity and public safety.
  - Fire access and traffic circulation are core health and safety concerns, not discretionary matters. These violations place the community in real danger.

### **Conclusion and Recommendation:**

The approval of this project was based on incomplete and deceptive site plans. The drive aisle widths do not meet zoning or fire safety requirements. This noncompliance disqualifies the project as a Public Benefit under LAMC §14.00 A.7 and warrants immediate revocation of its permits.

We respectfully request the City Planning Commission:

- Revoke the project's permit due to drive aisle noncompliance;
- Instruct LADBS to initiate enforcement actions against the developer;
- Reinforce that drive aisle and fire access standards are not optional and must be met without manipulation or circumvention.

## **Memo #10 Subject: RV Park at 23416 President Avenue – Unauthorized Density Increases and Misrepresentation of Plans**

**Summary:** The developer of the RV park at 23416 President Avenue submitted conflicting sets of site plans showing 39 and 46 RV spaces on the same blueprint. Despite these inconsistencies, the developer has built 47 stalls and installed 53 shore power units signaling intent to expand far beyond the approved design. These additions were not shown in any publicly disclosed plans, nor were they reviewed or permitted by LADBS. These discrepancies reflect willful manipulation of zoning documentation to increase commercial density in violation of Performance Standard #9 under LAMC §14.00 A.7.

### **Applicable Laws and Violations:**

1. LAMC §14.00 A.7(e)(9): "The use meets the parking requirements of Section 12.21 A."
  - Violation: The increase from 46 to 53 RV shore power stations was never included in the approved plans, thus violating the requirement to meet original parking and use parameters.
2. LAMC §12.21 A.1(a): Prohibits any use or structure not expressly permitted under an issued certificate of occupancy.
  - Violation: The 53 shore power units and the additional RV stalls constitute unpermitted use and expansion.
3. LAMC §91.106.4.1: Requires construction to match approved plans or to submit and receive approval for revised permits.
  - Violation: The current built conditions 47 RVs with hookups for 6 more are materially different from the approved project.
4. Performance Standard #9: Requires full compliance with §12.21 A, which covers dimensions, access, parking, and use limitations.
  - Violation: Increased density and new infrastructure were installed without ensuring access, landscaping, or fire code compliance.

### **Evidence of Manipulation:**

- Multiple conflicting plan sets were submitted, with no clarification offered to the public or reviewing agencies.
- ABC7 aerial footage (June 27, 2024) captured visual proof of more infrastructure than the plans reflected.
- Shore power units added to interior-facing sides allowed for additional RVs not disclosed in permit filings.

### **Why This Warrants Permit Revocation:**

- Pattern of deception: Submitting multiple versions of plans with conflicting densities misleads the public and oversight bodies.
- Exceeds scope of Public Benefit zoning: The developer failed to comply with the core requirement of Performance Standard #9, which mandates full transparency and conformity with LAMC §12.21 A.
- Not merely an enforcement issue: These discrepancies demonstrate a deliberate attempt to bypass zoning and public process, which undermines the legitimacy of the entire approval.

**Conclusion and Recommendation:** Because of these blatant misrepresentations, unauthorized infrastructure, and violations of zoning law, we urge the City Planning Commission to:

- Revoke the RV park's permits immediately;
- Disqualify the project's Public Benefit status under LAMC §14.00 A.7;
- Refer the matter to LADBS and City Attorney for enforcement and possible fraud review.

## **Memo #11 Subject: Pattern of LADBS Inaction Undermines Zoning Enforcement and Community Trust**

**Summary:** Addressing the Los Angeles Department of Building and Safety's (LADBS) failure to respond meaningfully to multiple documented complaints submitted by community members regarding clear violations at 23416 President Avenue. These include fencing discrepancies, buffer zone encroachments, missing landscaping, and unpermitted structures, all of which were either ignored or dismissed without thorough inspection.

### **Violation of Municipal Responsibilities:**

While the developer violated numerous provisions of the Los Angeles Municipal Code (LAMC) and Performance Standards under §14.00 A.7, LADBS failed to enforce:

- LAMC §91.103.1 - Grants LADBS authority and responsibility to enforce all provisions of the building and zoning codes.
- LAMC §91.106.4.1 - Requires that construction match approved plans, with LADBS responsible for verifying compliance.
- LAMC §12.21 A.1(a) - Prohibits any use, structure, or modification that deviates from approved plans or zoning code requirements.

Despite receiving complaints supported by photo and video documentation, LADBS closed multiple cases without field verification or follow-up reports effectively insulating the developer from scrutiny.

### **Why This Matters to CPC:**

The CPC is not just a procedural backstop. When LADBS fails to act, the CPC becomes the only venue for accountability. This project is approved under LAMC §14.00 A.7 as a *public benefit project* which requires full compliance with all 12 performance standards. Any violation disqualifies the project.

When community members exhaust all administrative pathways and are ignored, it signals a collapse in regulatory integrity. Permits issued under these conditions must be revoked, not merely corrected in the field.

### **Requested Action:**

We urge the City Planning Commission to:

- Revoke the project's Public Benefit eligibility and related permits under LAMC §14.00 A.7.
- Initiate an independent audit of LADBS handling of complaints regarding this site.
- Recommend the matter for referral to the City Attorney's Office to investigate systemic failure to enforce zoning standards.

The CPC must uphold the law where enforcement failed and restore public confidence in the zoning process.



**Memo #12 Subject: Unpermitted Expansion, Buffer Zone Encroachment, and Structural Violations - RV Park at 23416 President Avenue**

This memo documents zoning and building code violations at 23416 President Avenue. The developer exceeded project limits by expanding RV capacity, building unpermitted prefabricated structures, and violating buffer zone and ADA requirements. These deliberate actions warrant permit revocation.

**Key Violations:**

**1. Unpermitted RV Expansion**

- Approved for 46 RV stalls.
- 47 stalls built; 7 additional hookups installed in the front buffer zone totaling 54 RVs.

**Violations:**

- LAMC §12.21 A.1(a): Prohibits unapproved land uses.
- LAMC §91.106.4.1: Requires permits for any structural additions.

**2. Unapproved Prefab Structures**

- Three prefabricated buildings were added (likely bathrooms and laundry).
- Not shown in any approved plan set.

**Violations:**

- LAMC §91.106.4.1: Requires full plan disclosure and permit approval.

**3. Buffer Zone & ADA Stall Manipulation**

- Rear includes a 15-foot buffer and 18-foot ADA stall (33 ft total).
- ADA stalls were removed to fit electrical and methane infrastructure not shown on any plans.
- RVs now extend into buffer zones, eliminating landscaping.

**Violations:**

- LAMC §14.00 A.7, Standard #5: Requires a 10-foot landscaped buffer.
- LAMC §14.00 A.7, Standard #9 / §12.21: Requires compliant parking and circulation.
- ADA Compliance: Removal of ADA stalls violates federal access laws.

**4. Pattern of Deception**

- Prefab buildings and electrical and methane infrastructure not disclosed.
- Utility island hookups installed in landscaping areas.
- ADA stall removal concealed to increase RV capacity.

**Why Permits Should Be Revoked**

- These are not technical errors but clear attempts to evade zoning and public benefit standards.
- Project fails to qualify for Public Benefit status under LAMC §14.00 A.7.
- LADBS failed to act, leaving the CPC responsible for corrective action.

**Requested Actions:**

1. Revoke all entitlements and permits at 23416 President Avenue.
2. Remove Public Benefit designation under LAMC §14.00 A.7.
3. Refer to the City Attorney for potential fraud and misrepresentation.
4. Enforce restoration of landscaped buffers and ADA compliance.

Conclusion: This project exemplifies zoning abuse and enforcement failure. If allowed to stand, it sets a dangerous precedent. The CPC must act to uphold the law and protect neighborhoods.

**Memo #13 Subject: Stall Width and Spacing Violations – 23416 President Avenue RV Park  
Violations of Title 25 §2110 and §2330**

**Summary:** This memo documents serious stall layout violations at the RV park located at 23416 President Avenue, Harbor City, including excessive stall occupancy and illegal spacing between RV units. The project includes 29 stalls measuring 15 feet wide by 38 feet deep, and 17 stalls that are 20 feet wide (with stall depth undisclosed). Most notably, the site includes 7 rows of 4 RVs side by side, each occupying exactly 60 feet of horizontal space. This arrangement fails to meet the 6-foot required separation between units mandated by Title 25 §2330, and it creates a direct fire and life safety hazard.

**Stall Configuration Observed:**

- 29 stalls: 15 ft wide × 38 ft deep (570 sq ft per stall)
- 17 stalls: 20 ft wide (length undisclosed)
- Total site area: approx. 53,990 sq ft
- 7 rows of 4 RVs side by side, placed in four adjacent 15-ft-wide stalls (total 60 ft per row)

**Violations of Title 25:**

1. Title 25 §2110 – Maximum Occupied Area

- Each RV stall may not be more than 75% occupied by any combination of:
  - The RV itself
  - Slide-outs, stairs, decking, awnings, utility enclosures, or other structures
- In the 29 stalls measuring 570 sq ft:
  - 75% = 427.5 sq ft
  - A typical RV is 300 – 400 sq ft, and accessories routinely exceed this margin
- As a result, most of these stalls are over-occupied in violation of §2110.

2. Title 25 §2330 – Required Clearance Between RV Units

- Per §2330(a), a minimum 6-foot horizontal clearance is required between adjacent RVs: In the current site layout:
  - 4 RVs are placed in adjacent 15-ft-wide stalls, for a total of 60 ft
  - Each RV is approximately 8.5 feet wide, which leaves 6.5 feet of leftover space per stall
  - This means only 3.25 feet of clearance on each side of the RV not the required 6 feet between units

Even under ideal, perfectly centered conditions, this only provides 6.5 ft of shared clearance between units, not 6 ft from *each* RV. In practice, this clearance is further reduced by slide-outs, stairs, or misalignment.

Required Legal Width: To legally fit 4 RVs side by side:

- $4 \text{ RVs} \times 8.5 \text{ ft} = 34 \text{ ft}$
- $3 \text{ required separation gaps} \times 6 \text{ ft} = 18 \text{ ft}$
- Total minimum = 52 ft of usable width for RV bodies + clearances

However, because the RVs are assigned to individual stalls, the required clearances must be contained within the stall layout itself. Therefore:

- $4 \text{ stalls} \times 15 \text{ ft} + 3 \text{ clearances} \times 6 \text{ ft} = 78 \text{ ft total required width}$
- Conclusion: The current 60-ft layout falls 18 feet short of Title 25 spacing standards and violates §2330.

3. The remaining 17 stalls have wider measurements, but depth is unknown – Incomplete Data

- The 17 stalls listed at 20 ft wide cannot be evaluated for compliance with §2110 without knowing their depth
- If the stalls are undersized or occupied by oversized RVs with slide-outs or attached structures, they may exceed allowable space limits and constitute over-occupancy.

**Conclusion:**

- The 29 stalls at 15' × 38' are not compliant with Title 25 §§ 2110 (occupied area) and §2330 (spacing)
- The 7 rows of 4 RVs side by side in 60 ft strips are a direct and serious violation of state-mandated spacing requirements
- The minimum required width for 4 legally spaced RVs is 78 feet, not 60
- The layout poses immediate risks to fire safety, code compliance, and neighborhood compatibility
- The park as configured cannot legally qualify for Public Benefit Use under LAMC §14.00 A.7, which requires full compliance with zoning, safety, and public welfare standards

**Requested Actions:**

We respectfully request that the City Planning Commission:

1. Require the developer to disclose complete stall dimensions (including stall depth)
2. Direct LADBS and LAFD to inspect the site's stall occupancy, spacing, and fire access for compliance
3. Determine that the current site layout violates Title 25 and the Public Benefit Performance Standards under LAMC §14.00 A.7
4. Revoke or deny any continued entitlement to operate under the Public Benefit exemption until the site is brought into full compliance

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**Memo #14: Legal Violations Related to Missing Dimensions and Improper Plan Approval**  
**Subject: Omission of Critical Measurements and Approval of Noncompliant Plans – 23416 President Avenue (2 pages)**

**Summary:** This memo outlines the specific Los Angeles Municipal Code (LAMC) and California Code of Regulations (Title 25) violations committed by the developer through the submission of incomplete and misleading architectural plans. It also identifies regulatory failures by the Los Angeles Department of Building and Safety (LADBS), which approved and permitted plans without the required measurements to verify code compliance.

**Developer Violations:**

1. LAMC §91.106.4.1 – Incomplete Plans Submitted  
 All permit applications must include plans drawn to scale, showing the location, nature, and extent of proposed work.  
Violation: Developer omitted RV stall widths, depths, ADA stall dimensions, utility locations, and buffer measurements, preventing meaningful review.
2. LAMC §12.21 A.1(a) – Failure to Comply with Zoning Code  
 No building or use shall occur unless it complies with the provisions of this article.  
Violation: The RV layout encroaches into required buffer zones and drive aisles due to missing and misleading dimensional data.
3. LAMC §14.00 A.7 – Noncompliance with Public Benefit Performance Standards  
 Public Benefit uses must comply with mandatory landscaping, setback, access, and safety standards.  
Violation: The lack of complete dimensional data obstructs verification of compliance with required standards.
4. LAMC §91.0106 and §98.0403 – Material Misrepresentation  
 It is unlawful to knowingly omit, conceal, or falsify material facts in any application submitted to LADBS. Submitting incomplete or misleading plans such as omitting stall dimensions, infrastructure locations, or parking layout  
Violation: Deletion of stall dimensions, concealment of RV stall count increase, and failure to document utility infrastructure (Electrical and Methane) installations suggest deliberate evasion of plan review.

**Violations of California Code of Regulations (Title 25):**

1. Title 25 §2110 – Maximum Occupied Area  
 Stalls may not be more than 75% occupied by RVs and associated structures.  
Violation: Without dimensions, it cannot be verified whether stalls meet the 75% rule.
  2. Title 25 §2330 – Required Clearance Between Units  
 A minimum 6-foot horizontal clearance must exist between adjacent RVs.  
Violation: Missing stall widths obscure compliance; field measurements show only 3.25 feet of spacing per RV.
  3. Title 25 §2106 – Roadway Width Requirements  
 Two-way drive aisles must be a minimum of 18 feet wide.  
Violation: Developer built dead-end 15-foot-wide aisles that function as two-way roads.
  4. Title 25 §2428 – Utility Equipment Installation  
 Electrical equipment must be installed in documented, code-compliant locations.  
Violation: Electrical and methane infrastructure were installed inside ADA and buffer areas, not shown on plans.
-

**LADBS Regulatory Failures:**

## 1. LAMC §91.106.4.3.2 – Duty to Review for Code Compliance

LADBS must ensure submitted plans comply with zoning, access, and safety codes.

Regulatory Failure: LADBS Approved Architecturally Incomplete Plans Lacking Required Stall Measurements and Utility Infrastructure (Electrical and Methane)

## 2. LAMC §12.21 A.1 – Uniform Enforcement of Zoning Laws

All uses and structures must be equally subject to zoning enforcement.

Failure: LADBS applied enforcement inconsistently, approving plans that lacked required verification data.

## 3. LAMC §14.00 A.7 – Failure to Enforce Public Benefit Standards

Public Benefit projects must meet all performance standards before approval.

Failure: LADBS failed to require full plan data to confirm buffer zones, landscaping, and spacing compliance.

Conclusion: The omissions and deletions across submitted plans represent clear violations of both state and municipal law. LADBS's approval of incomplete documents reflects a failure in enforcement, undermining the integrity of zoning procedures. The developer's actions merit referral to the City Attorney for investigation into material misrepresentation and potential fraud.

**Requested Actions:**

- Revoke all permits and entitlements associated with the RV park.
- Refer the developer to the City Attorney for further investigation.
- Require resubmission of full site plans with all dimensions, stall data, and infrastructure clearly labeled.
- Direct LADBS to issue a stop-work order pending code compliance review.

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**Closing Statement: Why Revocation Is the Only Just Outcome**  
**Re: 23416 President Avenue – RV Park Violations and Public Harm**

Commissioners,

After reviewing the fourteen memos and accompanying documentation, one truth should be clear: this is not a matter of isolated violations or minor misunderstandings. What has occurred at 23416 President Avenue is a calculated, sustained pattern of deception, manipulation, and noncompliance carried out by the developer and enabled by the repeated failure of LADBS to uphold its enforcement responsibilities.

At every critical phase plan submission, permit issuance, and site inspection key details were omitted, altered, or ignored. The electrical and methane infrastructure, while conceptually approved, lacked any measured placement on the submitted plans. It was ultimately installed along the rear fence line, eliminating not only the required 15-foot landscaped buffer zone but also the ADA-compliant parking that was positioned in front of it, both of which were quietly removed without authorization or public notice. In addition, multiple unpermitted prefabricated structures were constructed, not only without disclosure or permits, but also within the required 10-foot side yard buffer zone, in clear violation of LAMC §14.00 A.7. Required landscaping buffers were erased entirely. And through it all, LADBS failed to act, signing off on noncompliant construction, closing valid community complaints, and turning a blind eye to mounting violations. This is not passive oversight, it is regulatory abandonment.

Of particular regulatory concern, the interior drive aisle widths were built as narrow as 15 feet well below the 19-foot minimum required under LAMC §12.21 A.5(e)(2) for any site serving more than 25 vehicles. This isn't just a zoning error, it's a *life-safety failure*. LADBS approved plans that violate basic fire access requirements, placing both residents and first responders at risk. Even Title 25 §2106(b)(1)(A) requires two-way roads in RV parks to be at least 18 feet wide to ensure safe vehicle and emergency access. Yet the developer built 15-foot-wide dead-end aisles, which function as two-way roads since vehicles must enter and exit the same way. This layout violates state safety standards and poses serious access risks. Regardless of which code applies, LAMC or Title 25, the 15-foot aisle is clearly out of compliance.

Worse still, the RV stall layout itself is fundamentally illegal under state law. Title 25 §2330 requires a minimum six-foot horizontal clearance between RV units. Yet the developer placed 4 RVs side by side in 15-foot-wide stalls across a 60-foot-wide row, leaving zero legal spacing between them. To comply with Title 25, a four-unit row must span at least 78 feet. This noncompliant configuration not only violates fire safety standards and building code it places lives at risk. Title 25 §2110 also limits the maximum occupied area per stall to 75%, but the developer can pack large RVs, accessories, and slide-outs into 15' × 38' pads, regularly exceeding the legal limit. These aren't minor technicalities. They are enforceable life-safety violations under California law.

Perhaps most telling of the developer's intent to mislead is that the final site plans omit the actual stall width measurements entirely. No dimensions were shown for the 46 interior RV stalls only for the outer perimeter and driveway widths. It was only through mathematical reverse-calculation using the total lot width and number of RVs that we discovered the interior stalls are just 15 feet wide, not the originally proposed 19 5/8 feet. Even more egregious, 47 RV stalls were constructed on-site without ever appearing on the submitted plans, further inflating site density in violation of approved entitlements. This deliberate omission should have triggered immediate scrutiny by LADBS. Instead, the department approved plans and construction that violate Title 25 §2330 (minimum 6 ft spacing) and §2110 (75% maximum occupancy). The concealment of stall widths and the addition of unpermitted stalls was not an accident; it was a strategy to mask noncompliance and overbuild the site beyond what safety laws allow.

Furthermore, because the project now exceeds the limitations of the original Public Benefit claim through increased density, eliminated parking, and the absence of ADA access it no longer qualifies for by-right approval under LAMC §14.00 A.7. This triggers the requirement for a Conditional Use Permit under LAMC §12.24 U.14, which the developer never applied for. Their failure to obtain a CUP is not a mere technicality; it is a jurisdictional failure that strips the project of its legal standing. The CPC is not limited to evaluating what the developer said they *would* do, but must assess what was actually built. The discrepancies between the approved plans and the built conditions are not minor; they are material, and they warrant denial of the entire entitlement.

The most troubling outcome? The developer may still walk away with entitlements and a functional RV park despite having violated the law every step of the way.

If the only consequence for knowingly submitting false plans, omitting key measurements, deleting ADA access, and overbuilding beyond permit limits is to “correct the issue later,” then we’ve created a system with no deterrents. One where deception becomes a strategy, not a risk.

If this Commission merely recommends future compliance or minor corrections, the message to developers across Los Angeles will be unmistakable:

**“Break the rules. Get the permit. Build what you want. And if you’re caught? You’ll get a second chance.”**

That’s not the purpose of zoning law. That’s not a public benefit. And that’s not equitable governance.

This isn’t just a legal issue, it’s a moral one. And the burden hasn’t been borne by the City, but by the residents. The community has been forced to raise over \$27,000 in filing fees, attorney costs, and documentation expenses just to get the City to enforce its own codes. This should never be the responsibility of residents.

And the violations at this Harbor City site echo an even deeper injustice. At the developer’s Wilmington site at 1551 Young Street, nearly identical violations continue to occur. Why? Perhaps because Wilmington is a BIPOC, working-class, environmentally overburdened neighborhood, where enforcement is weaker and community resources are fewer. That community never stood a chance and ours won’t either, unless this Commission chooses accountability over indifference.

And yet, when these violations are raised, the response is always the same: “*Not my job.*” The developer’s lawyers say it’s an enforcement issue, not a planning issue. LADBS says the plans look fine on paper, even if the built site is noncompliant. Zoning officials say they can only evaluate what’s stamped, not what’s actually constructed. No one takes responsibility. Everyone points elsewhere. It’s a regulatory shell game and it has left the public with no accountability, no recourse, and no protection.

But if every agency claims it’s not their rodeo, then who’s left holding the reins? The answer, unfortunately, is us the residents who’ve spent over \$27,000 in legal fees, filings, and documentation just to make sure the laws *you already passed* are actually enforced.

The developer violated:

- LAMC §14.00 A.7 – by failing multiple required Performance Standards
- LAMC §12.21 A.1(a) – by expanding use without obtaining the required approvals
- LAMC §91.106.4.1 – by constructing beyond the scope of approved plans
- Federal and State ADA laws – by removing designated accessible parking stalls
- Title 25 §2110 – by exceeding the maximum allowable occupied area per RV stall
- Title 25 §2330 – by failing to provide the required 6-foot separation between RV units
- Title 25 §2106(b)(1)(A) – by constructing substandard 15-foot-wide drive aisles that do not meet the minimum 18-foot requirement for two-way roads

Therefore, revocation is not just justified it is required to preserve the integrity of zoning law, to protect vulnerable communities, and to send a clear message:

Rules should apply equally to everyone, and those who violate them should not be rewarded.

We ask the City Planning Commission to:

- Revoke all entitlements and permits for 23416 President Avenue;
- Disqualify the project from Public Benefit status; and
- Refer the developer to the City Attorney for investigation into potential fraud and misrepresentation.

This is your opportunity to restore credibility, enforce the law, and protect Los Angeles communities from becoming test sites for unchecked abuse. We urge you to act accordingly.

Respectfully submitted,

Christal Cooper

Harbor City Resident / Community Advocate



## Communication from Public

**Name:**

**Date Submitted:** 07/27/2025 05:24 PM

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

**Comments for Public Posting:** This developer is attempting to bypass standard permitting, zoning and public oversight by labeling this project a "Public Benefit", and by invoking those magic words, they've been allowed to construct a non-compliant 46 to 54-stall RV park in an R1-zoned residential neighborhood, with little scrutiny or oversight. According to the developer's own website, each cramped RV space is expected to rent for upwards of \$1,900 per month, generating enormous profit for the developer with minimal regulation and extremely low development and operating costs. This raises a serious question: when so-called "Public Benefit" RV parks are more profitable, less regulated, fast-tracked, and face virtually no accountability for violating the rules, what incentive remains for developers to invest in traditional housing, which requires far more time, money, and compliance? And more fundamentally, how does charging low income individuals up to \$1,900 a month for a small RV parking space serve the public in any meaningful way, beyond enriching the developer? Despite numerous community-reported violations, this developer appears to face no real consequences for failing to meet the 12 required Performance Standards necessary to qualify for by-right, ministerial approval. The City must act to restore public trust. Projects claiming to serve the public should be subject to rigorous review, before approval, with oversight during construction, and accountability afterward, to ensure full compliance and to verify that they deliver real, measurable public benefit, not just private profit.

## Communication from Public

**Name:** Christal Cooper

**Date Submitted:** 07/27/2025 09:28 AM

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

**Comments for Public Posting:** Public Comment – Council File No. 24-0711-S1 I urge the Council to revoke the ministerial approval for the RV park at 23416 S. President Ave. The approved plan set contains a serious internal conflict: Sheet P-1 (approved site layout) shows 46 RV stalls, while Sheet P-4 (electrical) shows 49 utility pedestals, confirmed by counting 49 connection boxes on the plan. This overbuild violates the approved stall count and raises serious concerns about utility load and fire safety. Several pedestals also appear within the 10-ft buffer zone, violating LAMC §14.00 A.7 Performance Standard #2. LADBS approved the electrical plan despite this direct conflict with the Planning-approved site plan. Since the developer built according to the incorrect sheet, this invalidates the basis for ministerial approval under the Public Benefit provisions. This project was only permitted in an R1 zone because it was required to follow all 12 performance standards. It does not. Therefore, the approval must be revoked in its entirety.