## **Communication from Public**

Name: Lorrie Lathrop

**Date Submitted:** 11/24/2025 07:57 PM

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

**Comments for Public Posting:** Dear Council President and Honorable Councilmembers, The Harbor City Neighborhood Council submits this letter to express our opposition to the continued processing and approval of the proposed Silver RV Park (Oceans 11 RV Park LLC) under ministerial Public Benefit Project authority. We respectfully urge the City Council to uphold the City Planning Commission's determination and veto and remand the underlying approvals for this project. The City Planning Commission (CPC) found that the developer failed to comply with three of the twelve mandatory performance standards under LAMC 14.00 A.7. LADBS also confirmed that the plans were out of compliance. These standards are prerequisites for ministerial approval. Once a project fails even once, it is no longer eligible for ministerial processing and must undergo a full Conditional Use Permit review. The fact that the applicant was unable to meet three standards—despite repeated opportunities—demonstrates that this project is not appropriate for a streamlined pathway. Additionally, significant portions of the development were built inside the required buffer area, including walls, utility structures, and trash enclosures. These violations further reinforce that the project was never suitable for ministerial treatment. After Councilmember McOsker's Motion to stop the project was approved on June 26, 2024, further excavation on the property was done on July 23, 2024, utility structures were further built in the buffer with LADWP working on the property on July 30, 2024 and August 4 & 13, 2024, a wall was removed on August 14 - 21, 2024, and replaced with wrought iron fencing, undermining any claim that the project was substantially complete or properly constructed under the approved plans prior to Councilman McOsker's June 26, 2024 Motion. Although the developer pursued litigation related to the City's permit closure, the Superior Court did not grant full relief, and the City's and developer's appeals remain active. There is no legal obligation requiring the City to approve or reinstate the project, and its status remains both contested and unresolved. The City's recently adopted Interim Control Ordinance (CF 24-1005-S1), which pauses all RV Park permitting due to serious concerns about conflicting regulations, lack of oversight, and public health and safety risks, is a clear statement of City policy. Allowing this one project to move forward during

the effectiveness of the ICO would contradict the very purpose of that ordinance. If this RV Park is allowed to proceed ministerially rather than through a full discretionary review, Green Meadows West and the surrounding Harbor City neighborhoods will face significant and lasting negative impacts. A ministerial approval eliminates the public's ability—and the City's responsibility—to evaluate critical issues such as traffic circulation, emergency access, security measures, fire safety, noise, lighting, and incompatible land-use conflicts with existing single-family homes. The CPC has already found that the project fails to meet three of the twelve mandatory performance standards under LAMC 14.00 A.7, including buffer requirements and placement of utilities and structures—deficiencies that raise serious health and safety concerns. Proceeding ministerially despite these unresolved violations would deprive the neighborhood of the protections that the Conditional Use Permit process is specifically designed to provide. Without a CUP, there are no enforceable conditions, no mitigation measures, and no meaningful accountability for a project that will substantially increase activity, congestion, and risk in a community that is already burdened by aging infrastructure and limited public safety resources. For these reasons, a discretionary process is essential to ensure that this development does not harm the quality of life, safety, and stability of Green Meadows West. Lastly, prior to Councilman McOsker's Motion on June 26, 2024, this developer was advised by Councilman McOsker's office, and invited to HCNC Council meetings on multiple occasions, to speak with the residents about this project. The applicant was invited on February 20, 2024 and May 23, 2024 to provide a timely update to the Harbor City Neighborhood Council, however no response was provided. It was until June 2024 when the "Silver" team responded back to the Harbor City Neighborhood Council agreeing to provide an update to the community, however, they were a no-show at the June Board meeting. For these reasons, we respectfully request the City Council to uphold the CPC's action, remand the approvals, and require any future consideration of this project to proceed through a full and appropriate discretionary review process.





## **Governing Board**

President, Chris Wilson
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November 19, 2025

Council President Harris-Dawson and City Councilmembers City of Los Angeles 200 N. Spring Street Los Angeles, CA 90012

RE: <u>Community Impact Statement – Council Files 24-0711-S1; 24-0711-S2 - Silver RV Park / Oceans 11 RV Park LLC – 23416 & 23514 S. President Ave</u>

Dear Council President and Honorable Councilmembers,

The Harbor City Neighborhood Council submits this letter to express our **opposition** to the continued processing and approval of the proposed **Silver RV Park (Oceans 11 RV Park LLC)** under ministerial Public Benefit Project authority. We respectfully urge the City Council to **uphold the City Planning Commission's determination** and **veto and remand** the underlying approvals for this project.

The City Planning Commission (CPC) found that the developer failed to comply with **three of the twelve mandatory performance standards** under LAMC 14.00 A.7. LADBS also confirmed that the plans were out of compliance. These standards are prerequisites for ministerial approval. Once a project fails even once, it is no longer eligible for ministerial processing and must undergo a full Conditional Use Permit review. The fact that the applicant was unable to meet three standards—despite repeated opportunities—demonstrates that this project is not appropriate for a streamlined pathway.

Additionally, significant portions of the development were built inside the required buffer area, including walls, utility structures, and trash enclosures. These violations further reinforce that the project was never suitable for ministerial treatment.

After Councilmember McOsker's Motion to stop the project was approved on June 26, 2024, further excavation on the property was done on July 23, 2024, utility structures were further built in the buffer with LADWP working on the property on July 30, 2024 and August 4 & 13, 2024, a wall was removed on August 14 - 21, 2024, and replaced with wrought iron fencing, undermining any claim that the project was substantially complete or properly constructed under the approved plans prior to Councilman McOsker's June 26, 2024 Motion.

Although the developer pursued litigation related to the City's permit closure, the Superior Court did **not** grant full relief, and the City's and developer's appeals remain active. There is no legal obligation requiring the City to approve or reinstate the project, and its status remains both contested and unresolved.

The City's recently adopted **Interim Control Ordinance** (CF 24-1005-S1), which pauses all RV Park permitting due to serious concerns about conflicting regulations, lack of oversight, and public health and safety risks, is a clear statement of City policy. Allowing this one project to move forward during the effectiveness of the ICO would contradict the very purpose of that ordinance.

If this RV Park is allowed to proceed ministerially rather than through a full discretionary review, Green Meadows West and the surrounding Harbor City neighborhoods will face significant and lasting negative impacts. A ministerial approval eliminates the public's ability—and the City's responsibility—to evaluate critical issues such as traffic circulation, emergency access, security measures, fire safety, noise, lighting, and incompatible land-use conflicts with existing single-family homes. The CPC has already found that the project fails to meet three of the twelve mandatory performance standards under LAMC 14.00 A.7, including buffer requirements and placement of utilities and structures—deficiencies that raise serious health and safety concerns. Proceeding ministerially despite these unresolved violations would deprive the neighborhood of the protections that the Conditional Use Permit process is specifically designed to provide. Without a CUP, there are no enforceable conditions, no mitigation measures, and no meaningful accountability for a project that will substantially increase activity, congestion, and risk in a community that is already burdened by aging infrastructure and limited public safety resources. For these reasons, a discretionary process is essential to ensure that this development does not harm the quality of life, safety, and stability of Green Meadows West.

Lastly, prior to Councilman McOsker's Motion on June 26, 2024, this developer was advised by Councilman McOsker's office, and invited to HCNC Council meetings on multiple occasions, to speak with the residents about this project. The applicant was invited on February 20, 2024 and May 23, 2024 to provide a timely update to the Harbor City Neighborhood Council, however no response was provided. It was until June 2024 when the "Silver" team responded back to the Harbor City Neighborhood Council agreeing to provide an update to the community, however, they were a no-show at the June Board meeting.

Our community shares deep concerns about safety, emergency access, land-use compatibility, and the impacts of placing a high-intensity RV operation adjacent to established residential neighborhoods. These concerns have been consistently raised by residents of both Harbor City and Green Meadows West and remain insufficiently addressed.

For these reasons, we respectfully request the City Council to uphold the CPC's action, remand the approvals, and require any future consideration of this project to proceed through a full and appropriate discretionary review process.

Thank you for your consideration and for your commitment to protecting the health, safety, and welfare of our community.

Sincerely,

**Harbor City Neighborhood Council**