

## Communication from Public

**Name:** Sandra Tanaka

**Date Submitted:** 11/29/2025 06:02 PM

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

**Comments for Public Posting:** I oppose the project because the City recently passed an Interim Control Ordinance halting RV Park permitting due to safety issues and lack of regulation. Allowing this one project to move forward despite the ICO would create inconsistent policy and jeopardize public welfare. This developer has shown non-compliance with performance standards as well as having a history of developing sub-standard RV parks. As a long time resident of this neighborhood I fear the ramifications of allowing this park to open.

## Communication from Public

**Name:** Christal Cooper  
**Date Submitted:** 11/29/2025 10:48 AM  
**Council File No:** 24-0711-S1  
**Comments for Public Posting:** The approved plans contain zero notation that this is a self-contained-only park. Under Title 25 §1002, the park is therefore legally presumed to contain 46 dependent spaces requiring full restroom, shower, and laundry buildings which are completely missing. The ministerial permit is void

I am writing to request immediate attention to a significant state-law compliance defect in the approved plan set for 23416 S. President Avenue, now pending before the City Council under Council Files 24-0711-S1 and S2. The plans approved by LADBS and transmitted through CPC omit all mandatory restroom, shower, laundry, and service buildings required under Title 25 CCR §§1524, 1530, 1532, and 2106, as well as the accessible routes required by Title 25 CCR §2005. These facilities are mandatory in every RV park containing dependent spaces (as this one does) and must be included in the submitted plans before any ministerial approval under LAMC 14.00 A.7. The approved plans contain no notation whatsoever that all RVs are independent/self-contained; therefore, the park is presumed to contain dependent spaces requiring full service buildings under 25 CCR §1002.

Because the project contains 46 dependent RV spaces, 25 CCR §1532 requires full restroom, shower, and laundry facilities on-site. The complete omission of these buildings renders the plan set incomplete at the time of approval and the permit appears to have been issued in error under LAMC §91.106.4, which allows permits to issue only on complete and conforming plans. It is therefore subject to revocation under LAMC §98.0805, which authorizes revocation when a permit was “issued in error.” “Stage 2” construction status does not cure, postpone, or excuse noncompliance with Title 25, and these facilities cannot be added through a simple plan correction under LAMC §91.106.3. Adding the required buildings now would constitute new construction requiring discretionary review, ADA/Title 24 accessibility evaluation, CEQA analysis, and public hearings.

In addition, HSC §18865 prohibits the operation or permitting of any RV park lacking mandatory sanitary and service facilities, and HSC §18871.3 authorizes civil penalties of up to \$10,000 per day for violations of Special Occupancy Park requirements. Proceeding despite the absence of required Title 25 buildings exposes the City to substantial liability, including state preemption, ADA, Title 24, CEQA, and due-process claims. HCD SOPA Bulletin 2013-01 confirms that these facilities must be included in the original plan set submitted for review and cannot be deferred to later stages.

This issue has been formally submitted into the City Clerk record for the December 2 hearing. Given the seriousness of this defect, I respectfully request that LADBS and Planning immediately advise the City Council that the approval was issued on incomplete plans missing state-mandated facilities, and therefore cannot be relied upon for any continued ministerial processing.

The City also cannot rely on statements made at the November 17 PLUM hearing suggesting the developer may “resubmit corrected plans.” Under Title 25 and HCD guidance, required restroom, shower, and laundry buildings must be included in the originally submitted and reviewed plan set. They cannot be retrofitted, added post-approval, or treated as a correctable plan-check oversight. Their absence is a fundamental permitting defect that invalidates ministerial approval.

Thank you for your prompt attention to this matter.

## Communication from Public

**Name:** Christal Cooper

**Date Submitted:** 11/29/2025 09:41 AM

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

**Comments for Public Posting:** The approved plans for 23416 S. President Ave. omit all mandatory restroom, shower, laundry, and service buildings required in every RV park under Title 25 CCR §§1524, 1530, 1532, and 2106, making the ministerial approval legally defective. These state-required facilities must appear on the approved plans before any permit issuance; they cannot be deferred to “Stage 2” or added later without violating both Title 25 and LAMC 14.00 A.7, which requires full compliance with all Performance Standards at the time of ministerial approval. Because LADBS approved an incomplete plan set, the permit was issued in error under LAMC §98.0607, rendering the approval void, not merely voidable. Allowing the project to advance despite missing state-mandated buildings exposes the City to significant liability, including claims of arbitrary and capricious approval, unequal enforcement, and denial of due process for adjacent residents who were entitled to rely on complete and lawful plans. The CPC record already shows LADBS repeatedly clearing the project without verifying basic code requirements; the absence of Title 25 facilities confirms a deeper systemic failure that cannot be “fixed” through post-approval plan amendments. Under state law, a project that does not comply with mandatory standards cannot qualify for ministerial processing. For these reasons, the City Council must rescind the erroneous approval, uphold the §245 assertion of jurisdiction, and remand the project for full discretionary review, including CEQA, public hearings, and verification by the proper state agency. The City has no legal authority to ratify or ignore violations of Title 25.

## Communication from Public

**Name:**

**Date Submitted:** 11/29/2025 11:40 AM

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

**Comments for Public Posting:** “I oppose the Silver RV Park project because the City Planning Commission found that the developer failed to comply with 3 of the 12 mandatory performance standards under LAMC 14.00 A.7. Projects that do not meet these standards are required to go through a Conditional Use Permit process with proper review. This project presents safety concerns and must not move forward without full oversight.”