

## Communication from Public

**Name:** Homeowner

**Date Submitted:** 11/30/2025 02:49 PM

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

**Comments for Public Posting:** Regarding this RV park that is attempting to be placed into our community. I encourage each councilmember to ask themselves if they would want such a thing in their neighborhood. I challenge you to visit other sites that this developer has in Los Angeles. You will find that they are dilapidated, a place that has become severely unkempt, loud, noisy and smelly -- all so this developer can make money. We the homeowners have worked very hard to obtain a place we call home. We do NOT want our community subject to this type of "development". It is flatly unsafe and is not welcome here. That land could easily become a park for our kids to go and play -- not a place that is proposed.

## Communication from Public

**Name:** Toni Newman

**Date Submitted:** 11/30/2025 09:35 AM

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

**Comments for Public Posting:** “I oppose the issuance of permits for the Silver RV Park because the project was built out of compliance, with structures built inside the required buffer zones. This has already required demolition of a wall, erecting of new fencing, and utility structures/garbage enclosures are still in the buffer which will need removed and redone. These issues demonstrate that the project cannot be considered ministerial and should be remanded for proper review.”

## Communication from Public

**Name:** Christal Cooper

**Date Submitted:** 11/30/2025 01:41 PM

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

**Comments for Public Posting:** This submission provides evidence that the approved plan set for 23416 S. President Ave was incomplete and legally deficient under Title 25, Title 24, and LAMC §§91.106.4 and 98.0805. As detailed in the attached letter, none of the required Title 25 service buildings—restrooms, showers, laundry, or accessible routes—appear anywhere in the approved plans, and the HCD MP-514 form confirms that the same incomplete plan set was submitted to HCD. Because no plan set restricts all spaces to independent units, the project must be treated as containing dependent spaces under 25 CCR §1002, triggering mandatory sanitary and service-building requirements omitted from the plans. The evidence shows the permit was improperly issued on an incomplete plan set and is subject to revocation. This material is provided for the December 2 PLUM hearing so Councilmembers and the public may review the state-law violations and enforcement implications.

Earlier today, I submitted correspondence regarding a serious state-law compliance defect in the approved plan set for 23416 S. President Avenue, currently before the City Council under CF 24-0711-S1 and S2. I am writing now to supplement that submission with newly referenced evidence confirming that all agencies reviewed and approved an incomplete plan set that omitted mandatory Title 25 Special Occupancy Park facilities.

The plans approved by LADBS and transmitted through CPC do not show any of the required restroom, shower, laundry, or service buildings mandated under 25 CCR §§1524, 1530, 1532, 2005, and 2106. These facilities—and the accessible routes to them—are required for every Special Occupancy Park containing dependent spaces. The approved plans contain no notation restricting all spaces to independent/self-contained units, and under 25 CCR §1002, the spaces must therefore be treated as dependent, triggering the full sanitary and service-building requirements.

Critically, the HCD Local Approvals / Government Agency Approval Form (HCD MP-514) included in the plan set confirms that the applicant submitted the same plan sheets to HCD *exactly* as submitted to LADBS and CPC—with no required facilities shown anywhere. HCD's receipt acknowledgment does not validate the omission; it simply confirms that HCD was notified. This establishes that the applicant presented an incomplete plan set to every reviewing agency, and that the project was approved without the state-mandated service buildings required for a Special Occupancy Park.

Because these required facilities are entirely absent, the plan set was incomplete at the time of approval, and the permit appears to have been issued in error under LAMC §91.106.4 and subject to revocation under LAMC §98.0805. Further, "Stage 2" construction does not cure state-law violations, and the missing buildings cannot legally be added through a plan correction under LAMC §91.106.3. Constructing the required facilities now would constitute new work, requiring new discretionary review, ADA/Title 24 access analysis, CEQA review, and public hearings.

Health & Safety Code §18865 prohibits the operation or permitting of any RV park lacking mandatory sanitary and service facilities. Violations are enforceable under HSC §§18866.5 and 18871 et seq., with penalties up to \$10,000 per day.

I have also referred these materials to the California Department of Housing and Community Development (HCD) – Codes & Standards Enforcement Unit. Because the approved plan sets omit every mandatory sanitary and service building required under Title 25, I have requested that HCD review the plans submitted through the HCD MP-514 Local Approvals Form and determine whether these parks were approved on incomplete plan sets in violation of 25 CCR §§1524, 1530, 1532, 2005, and 2106. If confirmed, HCD has authority to open enforcement cases, issue Orders to Comply, and prohibit occupancy under Health & Safety Code §18865 until all required facilities are constructed, inspected, and approved. HCD's involvement is

necessary to ensure compliance with state Special Occupancy Park requirements and to prevent further reliance on incomplete or non-conforming plan sets.

This evidence has been provided to the City Clerk for the December 2 hearing and forms part of the administrative record. Given the seriousness of these defects, I respectfully request that LADBS and City Planning immediately advise the City Council that the approval was based on an incomplete plan set missing all state-mandated facilities, and that the project cannot lawfully continue under ministerial processing.