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Ref: 85397-0001

August 8, 2025

VIA E-MAIL (clerk.plumcommittee@lacity.org)

Hon. Chair Bob Blumenfield and Members of the Planning and Land
Use Management Committee
Attn: Candy Rosales, Legislative Assistant
City of Los Angeles
200 N. Spring Street, Room 272
Los Angeles, California 90012

Re: Case Number: DIR-2024-7352-BSA
Consideration of veto and remand or consideration of the determination
and findings of the Los Angeles City Planning Commission, dated July 14,
2025, denying appeal of Concerned Residents of Green Meadows West –
Harbor City
Property Address: 23416 S President Ave., Los Angeles
Planning and Land Use Management Committee hearing date: August 12,
2025

Dear Hon. Chair Bob Blumenfield and Members of the Planning and Land Use
Management Committee:

We represent Oceans 11 RV Park (“Oceans 11”), LLC, the applicant for the proposed Silver RV Park located at 23416 and 23514 South President Avenue (the “Project”). The Project is **by-right and ministerial, requiring only the issuance of a building permit.** Oceans 11 obtained that permit on March 22, 2024. But as construction of the Project neared completion, the Department of Building and Safety (“DBS”), acting at Council’s direction pursuant to a motion brought by Councilmember McOsker, voided the permit on June 28, 2024. Although all relevant City departments reported to the City Council **last August** that the Project meets all municipal code standards, that the City has no discretion over the Project, and that Oceans 11 is entitled to its permit, the City still has not reissued the permit leaving the Project in limbo. Making matters worse, the Project is considered a **housing project** protected by State housing laws, and the City’s interference with it exposes the City to substantial liabilities and significant attorney’s fees.

This matter is before this Committee under Charter Section 245 as a result of another motion brought by Councilmember McOsker pursuant to which the City Council asserted

jurisdiction over the Planning Commission's denial of an appeal of the Project's building permit brought by Project opponents (the "Appellants"). DBS, the Planning Director, and the City Planning Commission all correctly rejected this appeal, finding that DBS did not err or abuse its discretion in issuing the ministerial building permit for a new RV park under the code's Public Benefit Project regulations.

For your convenience, the two letters our office submitted to the Planning Commission in advance of the June 26, 2025 hearing are enclosed as Exhibits A and B. Also attached as Exhibit C is a letter our office sent the City Council on July 28, 2025, outlining the due process and code violations inherent in the Council's 245 action.

The points below summarize why the appeal is baseless:

- **The RV Park is a by-right, ministerial Public Benefit Project:** There is no question that this Project is by right and ministerial under the plain language of the Public Benefit Project regulations of Los Angeles Municipal Code ("LAMC") Section 14.00 A.7. That section provides that RV parks in the A, R, and C zones are allowable **by-right** when they satisfy twelve objective performance standards. Every City official and department that has reviewed the Project and the appeal has confirmed that (1) the Project meets all twelve performance standards; and (2) "[d]ue to the ministerial nature, the City is obligated to approve these by-right uses and cannot deny or condition Public Benefit Projects" like this one. (*See e.g.*, Exh. A to June 13, 2025, letter to the CPC.)

The Appellants ignore these governing standards and rely instead on a definition used in the code that (1) predates the Public Benefit Project ordinance allowing RV Parks ministerially; and (2) applies only to projects that do not meet the Section 14.00 A.7's performance standards. *See* LAMC § 14.00.B.1 ("[i]f a proposed public benefit project [including an RV park] does not comply with the performance standards...the applicant **may** apply for approval of a conditional use permit.").

The Court in a pending lawsuit against the City has already rejected Appellants' argument that the Project requires a conditional use permit ("CUP"), noting that DBS and Planning determined in writing that the Project is "allowed on a ministerial basis" and "does not reference anything about any other requirement." Accordingly, the Court stated that **"This does not look good for the City when I have a memo that says they're entitled to this...."** **"This is a strange case to me....I don't get a case where the staff says, yeah. They're entitled to the permit but we're just not giving it to them."** (emphasis added) (*Oceans 11 RV Park, LLC v. City of Los Angeles*, Case No. 24STCV16728, Reporter's Transcript of the Proceedings, June 4, 2025.)

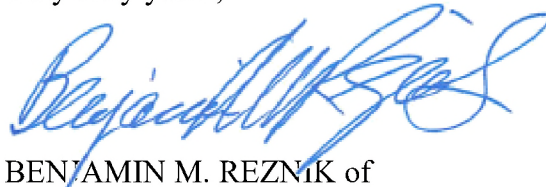
- **The Project satisfies the performance standards:** No one in the City disputes that the Project meets every performance standard. DBS, the Planning Department, the Planning Director on appeal, the Planning Commission on appeal, and even the City Attorneys in

Hon. Chair Bob Blumenfield and Members of
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Oceans 11's pending litigation against the City all agree that the Project satisfies the performance standards. There is no serious argument to the contrary.

The Appeal has already been rejected three times and there is no basis for reversal now. PLUM should recommend that the City Council: (1) affirm the Planning Commission's denial of the Appeal; and (2) direct DBS to immediately issue the ministerial permits for the Project (Permit Nos. 23020-10000-02232 and 24016-10000-00086).

Very truly yours,



BENJAMIN M. REZNIK of
Jeffer Mangels Butler & Mitchell LLP

cc: President Marqueece Harris-Dawson and Hon. Members of the City Council
(CityClerk@lacity.org)
Donna Wong, Office of the City of Los Angeles City Attorney
Helen Campbell, Planning Director (CD1) (helen.campbell@lacity.org)
Tiffany Zeytounian, Planning Deputy (CD2) (tiffany.zeytounian@lacity.org)
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EXHIBIT A

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June 13, 2025

BY EMAIL ONLY

President Lawshe
Members of the City Planning Commission
Department of City Planning
City of Los Angeles
200 N. Spring St.
Los Angeles, CA 90012
Attn: Eva Bencomo, Commission Executive Assistant I
Attn: Cecilia Lamas, Commission Executive Assistant II
E-Mail: cpc@lacity.org
eva.m.bencomo@lacity.org
cecilia.lamas@lacity.org

Re: Case Number: DIR-2024-7352-BSA
Response to Appellant's April 22, 2025 Justification to Appeal
Property Address: 23416 S President Ave., Los Angeles
City Planning Commission Hearing Date: June 26, 2025

Dear President Lawshe and Members of the City Planning Commission:

Our office represents Oceans 11 RV Park, LLC ("Oceans 11"), the owner of 23416 S. President Avenue, Los Angeles (the "Site"), and the applicant for the project at issue in this appeal. For background, Oceans 11 applied for a building permit to develop a recreational vehicle ("RV") park as a by-right Public Benefit Project that complies with the performance standards of LAMC Section 14.00A(7) (the "Project"). This Project would provide additional alternative housing for its residents. Tenants would be required to sign leases and attach their RVs to the water, sewer, and power lines.

Oceans 11 received the necessary approvals from all relevant City departments, including the Department of City Planning ("Planning Department") and the Department of Building & Safety ("DBS"). In August 2024, the Planning Department and DBS issued a joint inter-departmental memorandum analyzing each performance standard in detail and concluding that the Project "is in compliance with the Public Benefit performance standards per LAMC Section 14.00 A.7" and that "[t]he City does not have an ability to impose additional conditions, outside of the Public Benefits provisions, for the use of land associated with the proposed RV Park, which the project meets." (Exhibit A.)

The appellant, Concerned Residents of Green Meadows West – Harbor City (the “Appellant”), has already twice appealed the Project and has lost both times. On July 18, 2024, Appellant appealed DBS’ original issuance of Permit No. 23020-10000-02232 (“Original Permit”) for the Project and the City’s purported intention to issue Supplemental Permit No. 24016-10000-00086 (“Supplemental Permit”).¹ On August 2, 2024, DBS denied the appeal in its entirety because it found that the Project complied in every respect with the performance standards set forth in LAMC Section 14.00A.7 and was therefore entitled to ministerial approval.

On November 12, 2024, Appellant appealed DBS’ decision to the Director of Planning on the similar grounds. A public hearing on the appeal was held on January 16, 2025. On April 9, 2025, the Director of Planning determined that DBS did not err or abuse its discretion in any way—including in preparing to issue the Supplemental Permit without a CUP—because the Project qualifies as a ministerial Public Benefit Project by complying with the twelve enumerated performance standards set forth in LAMC § 14.00A.7. The Planning Director further found that RV parks are listed among the uses allowed as Public Benefit Projects and no further showing of how the project “benefits” the public or whether or not the Project is “for profit” is required.

I. The Planning Director Did Not Err or Abuse Its Discretion

Appellant now appeals the Planning Director’s decision to the City Planning Commission on virtually the same grounds asserted unsuccessfully twice before. Neither DBS nor the Planning Director erred or abused its discretion, and the City Planning Commission should deny this appeal.

A. The Special Occupancy Parks Act does not compel the City to require a conditional use permit for RV parks qualifying as Public Benefit Projects.

Appellant contends that the California Special Occupancy Parks Act (the “Act”) forces the City to require a CUP for all RV parks. The Act does no such thing. The Act is a state law requirement to secure a “conditional permit” from the State of California Department of Housing and Community Development (“HCD”)—a state safety permit entirely separate from a local land use entitlement. Nothing in the Act mentions, much less mandates, a City-issued CUP for an RV Park. State permitting remains solely within HCD’s jurisdiction. And here, Oceans 11 has already stated on the record that it has applied with HCD for its state conditional permit.

The Planning Director squarely addressed this point: “The Special Occupancy Parks Act does not compel the City to issue a conditional use permit.” Simply stated, the Health & Safety Code neither invalidates nor modifies LAMC § 14.00A.7. Compliance with the twelve performance standards remains the sole prerequisite for the City to permit an RV Park as a ministerial Public Benefit Project.

¹ It should be noted that the original permit is currently closed and the supplemental permit has not been issued so it is unclear what Appellant is even appealing.

1. A qualifying Public Benefit Project under LAMC Section 14.00A.7 is a ministerial, by-right project that does not require a CUP.

Appellant next contends that the RV Park requires a CUP because of the definition of “recreational vehicle park” in Section 12.03 of the LAMC, which states in relevant part: “Any lot or portion of a lot permitted by conditional use to provide rental or lease sites for individual recreational vehicles which are occupied for temporary purposes.” Section 12.03 is purely a definitional section, not the regulations that govern a particular use.

Instead, the required process for permitting an RV Park is set forth in Section 14.00A.7. Under Section 14.00A.7, a CUP is only required for RV Parks that do not meet the twelve performance standards and is not otherwise allowable in the zone. As detailed below, the City has consistently and repeatedly found that this Project meets all twelve performance standards and must be permitted ministerially.²

2. The Project complies with the performance standards.

Appellant’s final argument is that DBS erred in issuing a building permit without a CUP because the RV park does not meet the twelve performance standards contained in LAMC Section 14.00A.7.

At the outset, the Planning Director correctly pointed out that there are no active building permits for this Project to appeal. The Original Permit is currently “closed” and the Supplemental Permit has not been issued.

Also troubling is Appellant’s failure to provide any explanation or evidence as to why it contends that certain performance standards have not been met. All Appellant says is that “[e]vidence will be presented that the project does not” satisfy performance standards 3, 4, 5, 6, 8, and 9. For the time being, we will assume that Appellant intends to present the same “evidence” of allegedly unmet performance standards that it had presented at the prior two hearings, which we address below:

Performance Standard #3:

To date, Appellant has not provided any credible evidence that the Project does not comply with Performance Standard #3 requiring a solid decorative masonry or wrought iron wall/fence encircling the periphery of the property that is at least eight feet in height, or the maximum height permitted by the zone, whichever is less. On August 1, 2024, the Planning Department approved Oceans 11’s plans submitted with the Supplemental Permit application because it shows new 8-foot tall wrought iron fences along the front and rear property lines and

² The Planning Director also correctly noted that although the procedures for permitting RV parks has been modified throughout the years, the RV Park definition has not undergone corresponding updates.

existing 8-foot tall concrete block walls on the side property lines. As the plans show 8-foot tall walls/fences “encircling the periphery of the property,” the plans unquestionably comply with Performance Standard #3.

Performance Standard #4:

Performance Standard #4 requires a front yard setback at least as deep as the underlying zone. The Site is zoned R1-1XL-O, which requires a minimum front yard setback that is 20% of the lot depth, but that does not need to be greater than 20 feet, or a prevailing setback if 40% or more of the lots along the frontage observe a front yard setback that varies not more than 10 feet.

Both the City and Oceans 11 calculated a prevailing setback that was less than 20 feet. Oceans 11’s plans nevertheless show a 20-foot front yard setback, which exceeds the calculated prevailing setback. Thus, the plans undoubtedly comply with Performance Standard #4.

Performance Standard #5:

Performance Standard #5 requires a 10-foot landscaped buffer along the periphery of the Property. The Planning Department approved Oceans 11’s plans submitted with its Supplemental Permit application showing a 10-foot landscaped buffer along the periphery as required. Thus, the Project complies with Performance Standard #5.

Performance Standard #6:

Performance Standard #6 requires parking areas be landscaped in accordance with LAMC Section 12.21 A.6, which requires that at least four percent of the parking area be devoted to the following improvements: (1) 1/4th of the required improvements will be credited for street trees that comply with the Master Plan for Street Trees; (2) 1/4th of the required improvements will be credited for walls that are constructed along all lot lines abutting a street; (3) up to and including 3/4ths of the requirements will be credited for landscaped setback areas or interior landscaping, provided that the total of said setback area is equal to that percent of the total parking area being credited.

Here, 4% of the 46,135 s.f. parking area is 1,845.5 s.f. The plans show 4,000 s.f. of landscaped area in the front, which exceeds the required 4% of landscaped area. Additionally, 1/4th of the 4% of the parking area is credited for 10 existing crepe myrtle street trees. Thus, the plans comply with Performance Standard #6.

Performance Standard #8:

Performance Standard #7 states that all graffiti must be removed or painted over within 24 hours of its occurrence. Appellant’s suggestion that Oceans 11 has not complied with Performance Standard #8 before the Project has even been completed (and permitted) is ludicrous. At the last hearing, Appellant identified certain graffiti on the rear chain link fence. The plans,

however, show that a new 8-foot tall wrought iron fence will be installed in its place. Oceans 11 further recorded a covenant agreeing to comply with the Public Benefit Project performance standards contained in LAMC Section 14.00A.7, which will be triggered once the Project is permitted and the new fence is erected.

Performance Standard #9:

Performance Standard #9 requires that the use satisfy the parking requirements of LAMC Section 12.21A, which contain the City’s offsite parking requirements. Appellant argues that the Planning Director erred in concluding that LAMC Section 12.21A “does not provide specific guidance on parking requirements for recreational vehicles.” Specifically, Appellant argues that the Planning Director’s reliance on the offsite parking exemption at the end of LAMC Section 12.21A applies only to “mobilehome parks”, but not “RV parks”. Even if the exemption was exclusive to mobilehome parks, however, Appellant still has not identified anything in LAMC Section 12.21 or elsewhere in the code that requires a minimum number of parking spaces for RV parks because there is none. (Exhibit A at pg. 7 [Planning Department and DBS stating that “LAMC Section 12.21.A does not provide any specific guidance on the parking requirements for recreational vehicle parks or mobile home parks.”].) Appellant admits as much: “[The LAMC] lack[s] [] explicit parking ratios for RV parks.” (Appeal to CPC, p. 4.)

In summary, Appellant insists that the Project must “comply with the intent and framework of LAMC § 12.21 A” without ever identifying what the alleged parking requirement is under the LAMC or otherwise. In fact, Appellant also offhandedly states that “RV’s are governed by California Recreational Vehicle Occupancy Law” encoded in Civil Code Section 799.20 *et seq.*, but again fails to establish any minimum offsite parking requirement for RV parks under that statute. And, in any event, Appellant claims that no statute—be it Civil Code Section 799.20 *et seq.* or Title 25 of the California Code of Regulations for Special Occupancy Parks—“does not supersede the City’s Code requirements...” for offsite parking.

In any event, Oceans 11 **is** providing ample off-street parking. The plans show that each of the RV spots will be accompanied by one parking space. Further, two ADA parking stalls will be situated at the center rear of the Property.

3. Compliance with the Performance Standards renders the Project a Public Benefit.

Appellant’s final argument is that the Project is not eligible as a Public Benefit Project because it proposes a “for profit” use. That is nonsense.

The criteria for being deemed a Public Benefit Project is that: (1) the proposed use is one of the thirteen specific uses identified in LAMC Section 14.00; and (2) the specific use meets the applicable performance standards. Nothing in Section 14.00 or elsewhere in the code determines Public Benefit Project eligibility based on whether the project is or is not for profit and/or whether the applicant adequately demonstrates the project’s benefit to the public. The

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Appellant made that up. If the use is listed in Section 14.00 and the project meets the corresponding performance standards, it is a Public Benefit Project.

Finally, Appellant has in the past argued, and may very well do so again at the upcoming hearing, that the onsite conditions deviate from the City-approved plans. Those arguments are factually false, premature, and outside the scope of a CPC administrative appeal. After all, the City still has not even issued Oceans 11 permits for the Project and has not performed final inspections. Thus, verification of onsite conditions has not even occurred yet, and when it does, DBS and not Planning confirms that the work performed and onsite conditions accurately reflect the approved plans.

We appreciate your attention to these matters and reserve the right to supplement our arguments.

Sincerely,



BENJAMIN M. REZNIK of
Jeffer Mangels Butler & Mitchell LLP

cc: Kristina Kropp, Luna & Glushon (Appellant Representative)


EXHIBIT A

CITY OF LOS ANGELES
INTER-DEPARTMENTAL MEMORANDUM

Date: August 23, 2024

To: Honorable City Council
c/o City Clerk, Room 395
Los Angeles, California 90012

Attention: PLUM Committee

From: Vincent P. Bertoni, AICP, Director of Planning 
Department of City Planning

Osama Younan, General Manager *Allen Manalansan FOR*
Department of Building and Safety

Dear Honorable Members:

**DEPARTMENT OF CITY PLANNING AND DEPARTMENT OF BUILDING AND SAFETY
REPORT BACK REGARDING 23416 PRESIDENT AVENUE; CF 24-0711**

BACKGROUND

On June 26, 2024, the City Council adopted a motion instructing the Department of City Planning and the Department of Building and Safety (LADBS) to report back on the property located at 23416 President Avenue. The report includes the following information:

- the environmental analysis, as well as any required standard evaluations, that are required for any construction or projects to occur;
- whether the Home-Sharing (Short-Term Rental) Ordinance would be applicable to the proposed use; what requirements are necessary for the use to comply, and what enforcement mechanisms exist for the proposed Recreational Vehicle (RV) Park;
- the type and extent of the “public benefits” associated with the proposed use, and a description of the public benefits checklist and standards that qualify this project as a “public benefit project” per the Los Angeles Municipal Code 14.00A7; and,
- a description of the City’s ability to impose additional conditions for the use of land associated with the proposed RV park.

SUMMARY

Pursuant to LAMC Section 14.00.A7, Recreational Vehicle Parks (RV Parks) are a by-right use in the A, R or C Zones, if the proposed project complies with the 12 objective performance standards. Public Benefit Projects, such as RV Parks, are allowed citywide, on a ministerial basis. Public Benefit Projects are uses which have been determined to have a citywide benefit and public purpose, rather than a site-specific benefit. The Public Benefit Projects Administrative Procedures were adopted by the Los Angeles City Council, on July 1, 2000, as part of Charter Reform (Ordinance No. 173,268). Due to the ministerial nature, the City is obligated to approve these by-right uses and cannot deny or condition Public Benefit Projects.

DISCUSSION

Subject Site Zoning and General Plan Land Use Designation

The subject property is a level, approximately 54,012 square-foot site, consisting of two parcels zoned R1-1XL-O with a Low Residential land use designation (Exhibit A). The property has approximately 350 feet of frontage on President Avenue in Harbor City. The property address is 23416 and 23514 South President Avenue. The property is located in a single-family residential neighborhood developed with one- and two-story homes. The property abuts Metro right-of-way to the east. President Avenue is a Local Street improved to a width of 60 feet with sidewalks, curb, gutter, and street trees. The property formerly contained an oil-drilling use, which was decommissioned in 2022.

On November 9, 2023, the property owner applied for a “Use of Land Permit (Permit No. 23020-10000-02232) to allow a new Recreational Vehicle Park for Public Benefit Project per LAMC Section 14.00A7.” (Exhibit B) On July 9, 2024, the property owner applied for a Supplemental Building Permit for a “Use of Land for new recreational Vehicle Park for Public Benefit Project per LAMC 14.00A7.” (Exhibit C, permit 24026-10000-00086) The supplemental permit was necessary to update the site plan to show compliance with public benefit standards relating to landscaping, fencing, and parking (Exhibit D).

RELEVANT ZONING CODE DEFINITIONS AND REGULATIONS

LAMC Section 12.03 Definitions

Home-Sharing - An accessory use of a Host’s Primary Residence for a maximum of 120 days in a calendar year for the purpose of providing Short-Term Rental in compliance with the registration and other requirements of Los Angeles Municipal Code Section 12.22 A.32. For purposes of this definition, the terms “Host”, “Short-Term Rental” and “Primary Residence” shall have the same meaning as defined in Section 12.22 A.32. of this Code. (Added by Ord. No. 185,931, Eff. 7/1/19.)

Recreational Vehicle - A portable vehicle mounted on wheels, with or without motive power, and primarily designed and constructed to provide human habitation for recreational, camping, travel or emergency purposes. (Added by Ord. No. 161,716, Eff. 12/6/86.)

Recreational Vehicle Park - Any lot or portion of a lot permitted by conditional use to provide rental or lease sites for individual recreational vehicles which are occupied for temporary purposes. (Added by Ord. No. 161,716, Eff. 12/6/86.)

LAMC Section 14.00 - Public Benefit Projects (Amended by Ord. No. 173,268, Eff. 7/1/00) ¹

A. Public Benefit Projects and Performance Standards. Where not permitted by right or by Conditional Use Permit pursuant to Subsections U., V. or W. of Section 12.24, the following public benefit uses are permitted in any zone, unless restricted to certain zones or locations. The uses shall meet the following performance standards or alternative compliance measures approved pursuant to Subsection B. (First Para. Amended by Ord. No. 173,992, Eff. 7/6/01.)

B. Alternative Compliance Procedures for Public Benefit Projects.

1. Applicability. If a proposed public benefit project does not comply with the performance standards delineated in Subsection A, the applicant may apply for approval of alternative compliance measures pursuant to the following procedures.

RESPONSES TO THE CITY COUNCIL MOTION

Below is a response to each question raised in the City Council Motion regarding the building permit application for the proposed Recreational Vehicle Park (RV Park) at the 23416 President Avenue property.

1) Required environmental analysis, as well as any required standard evaluations, that are needed for any construction or projects to occur

If a project qualifies as a Public Benefit Project, by meeting each of the enumerated Performance Standards in 14.00A(7), it is subject only to an administrative review process. As such, it is exempt from application of the California Environmental Quality Act (CEQA). Although the subject building permit application did not require CEQA analysis, the project was subject to Los Angeles Fire Department (LAFD) review for compliance with CalGEM standards for oil well abandonment and sealing of previous oil drilling operations.

2) Applicability of the Home-Sharing (Short-Term Rental) Ordinance to the proposed use; if applicable requirements necessary for the use to comply, and enforcement mechanisms exist for the proposed RV park

The Home-Sharing Ordinance (No. 185,931), prohibits home-sharing in non-residential buildings, including vehicles parked on the property, storage sheds, trailers, or any temporary structures. Per LAMC Section 12.03, a RV Park is defined as providing rental or lease sites for individual

¹ This Zoning Code Section was amended as part of the Processes and Procedures updates that were effective on January 22, 2024. The amended regulations are not applicable to the subject project because the building permit application was submitted and plan check fees were paid in November 2023.

recreational vehicles occupied for temporary purposes. Since temporary purposes indicate that these are not permanent residences, this property and/or these individual recreational vehicles are not eligible for a Home-Sharing registration.

Short-term rentals within the City of Los Angeles are routinely scanned for compliance with Home-Sharing regulations. Listings advertising a short-term rental listing without a valid Home-Sharing registration number will be considered out of compliance. City Planning refers non-compliant violations to the appropriate agencies, which may issue a citation.

LADBS issues citations for single-dwelling properties and condominium units, while the Los Angeles Housing Department issues citations for multiple-dwelling properties. A Notice of Code Violation will specify the steps that the cited party may take in response to the citation. Other City Departments such as the Los Angeles Police Department, the Fire Department, the Department of Transportation, and the Bureau of Sanitation, address specific issues like noise complaints, party house violations, fire safety, parking violations, and litter.

3) The type and extent of the “public benefits” associated with the proposed use, and a description of the public benefits checklist and standards that qualify this project as a “public benefit project” per the Los Angeles Municipal Code 14.00A7

LAMC Section 14.00 enumerates 13 types of Public Benefit Project uses, ranging from cemeteries, density bonus projects, parks, homeless shelters and Certified Farmers’ Markets, that qualify for administrative approval if the project complies with the respective performance standards. There is no criteria or requirement in the code to evaluate the “public benefits” of a proposed Public Benefit Project. LAMC Section 14.00.A7 states the following about RV Parks:

Recreational vehicle parks and mobile home parks in the A, R or C Zones where any trailer, mobile home or recreational vehicle is permitted to remain longer than one day and which were lawfully created after the effective date of the ordinance adding this use to the Code.

If a proposed RV Park is located in the A, R or C Zone, and it complies with the 12 performance standards, it is permitted by right. Public Benefits Projects that can’t comply with all of the required performance standards listed in LAMC Section 14.00, can file for a discretionary approval of (LAMC Section 14.00.B), which is acted on by the Director of Planning or Associate Zoning Administrator, depending on whether the application was submitted before January 2024.

Public Benefits Checklist and Performance Standards for the Subject Project

Applicants requesting approval of a Public Benefits Project are required to fill out the Public Benefits Checklist (Exhibit E) to ensure the project complies with the applicable performance standards. Enumerated below are the 12 performance standards per LAMC Section 14.00 A.7 (Recreational vehicle parks and mobile home parks in the A, R or C Zones) and an explanation for how the subject project complies with each standard.

1. No buildings are higher than any main building on adjoining property or across a street or alley from the use.

The submitted site plan does not propose any buildings.

2. The use is conducted in conformance with the City's noise regulations pursuant to Chapter 11 of this Code.

The applicant has attested that the project will comply with the City's noise regulations via the recordation of a Covenant and Agreement. The covenant was recorded on November 21, 2023 (Instrument no. 20230807676).

3. There is a solid decorative masonry or wrought iron wall/fence at least 8 feet in height, or the maximum height permitted by the zone, whichever is less. The wall/fence encircles the periphery of the property and does not extend into the required front yard setback.

The project proposes a new 8-foot high wrought iron fence in the front yard and rear yard. An existing 8-foot high concrete wall will continue to be maintained along the westerly and easterly property lines. The wrought iron fence does not extend into the required 20-foot front yard setback as it is located 20 feet from the property line facing President Avenue.

4. The front yard setback is at least as deep as the setback required by the zone.

Per LAMC Section 12.08 C.1, the R1 Zone requires a front yard of not less than 20% of the depth of the lot, but such front yard need not exceed 20 feet. The subject lot has a depth of 134 feet. 20% of 134 is 26 feet. Therefore, 20 feet complies with the R1 Zone front yard setback requirement.

5. The property is improved with a 10-foot landscaped buffer along the periphery of the property, which is maintained and is equipped with an automatic irrigation system.

As shown on the site plan, the project proposes a 10-foot landscaped buffer along the periphery of the property. As noted on the plans, an automatic irrigation system will be installed.

6. Parking areas are landscaped pursuant to the requirements of Section 12.21 A 6.

Per LAMC Section 12.21 A.6, at least four percent of the parking area shall be devoted to improvements as follows:

(1) One-fourth of the required four percent improvement shall be credited for street trees planted in accordance with plans approved by the Street Tree Division. Approval

shall be granted for any plan which complies with the Master Plan for Street Trees. Existing street trees shall be considered in satisfying this provision;

(2) One-fourth of the required four percent improvement shall be credited for walls, provided that walls are constructed along all lot lines abutting a street. Existing walls shall be credited;

(3) Up to and including three-fourths of the four percent improvement shall be credited for landscaped setback areas, provided that the total of said setback area is equal to the percent of the total parking area credited;

(4) Up to and including three-fourths of the four percent improvement shall be credited for interior landscaping, provided that the total of such landscaped area is equal to that percent of the total parking area being credited;

(5) On those lots having no street frontage, four percent improvement shall be credited for interior landscaping provided the total of such landscaped area is equal to that percent of the total parking area being credited.

As shown on the plans, the project will continue to maintain 10 existing Crape Myrtle street trees, which accounts for one-fourth percent credit of the required four percent.

The total square footage of the parking area is 46,136 square feet. Four percent of 46,136 square feet is 1,845.44 square feet. The project proposes a 4,000 square foot landscaped area in the front yard, which exceeds the required 4% of landscaped area required.

7. Only one identification sign is displayed on the site and it is on the building face. The sign does not exceed 20 square feet, and does not extend more than 2 feet beyond the wall of the building, and does not project above the roof ridge or parapet wall (whichever is higher) of the building.

The project proposes one, 20 square-foot identification sign to be mounted to the right of the northerly driveway entrance.

8. All graffiti on the site is removed or painted over in the same color as the surface to which it is applied within 24 hours of its occurrence.

The applicant has agreed to comply with this performance standard via the recordation of a Covenant and Agreement. The covenant was recorded on November 21, 2023 (Instrument no. 20230807676).

9. The use meets the parking requirements of Section 12.21 A.

LAMC Section 12.21 A does not provide any specific guidance on the parking requirements for recreational vehicle parks or mobile home parks. Furthermore, the Department of Building and Safety Information Bulletin for Parking Regulations page 2 (Exhibit F) notes that per Title 25 of the California Administrative Code parking regulations for mobile home parks are not applicable. The project is proposing 46 recreational vehicles parking stalls. Each stall will provide an area for one car to park.

10. All streets, alleys and sidewalks adjoining the property meet standard street dimensions.

President Avenue is designated as a Local Street - Standard, which requires a 60-foot right-of-way width and a 36-foot roadway width. Both ZIMAS and Navigate LA show that the street dimensions are in compliance.

11. There are no outdoor public telephones on the site.

As noted on the plans, there are no public telephones proposed on the site.

12. Security night lighting is shielded so that the light source cannot be seen from adjacent residential properties.

The project proposes shielded solar light poles on-site. The shielding on the lights prevents the light source from being seen from adjacent properties.

4) The City's ability to impose additional conditions for the use of land associated with the proposed RV park

LADBS only has the ability to enforce objective building and zoning code standards. Additionally, LADBS required the applicant to obtain approval from LASAN, DCP, and LAFD.

The City does not have an ability to impose additional conditions, outside of the Public Benefits provisions, for the use of land associated with the proposed RV park., which the project meets. If a project does not meet all 12 performance standards, the applicant must file for a discretionary approval per 14.00. B.1. Under a discretionary permit, which is not applicable here, City Planning may add conditions of approval.

CONCLUSION

The review by City Planning staff found that the RV Park located at 23416 President Avenue is in compliance with the Public Benefit performance standards per LAMC Section 14.00 A.7 (Recreational vehicle parks and mobile home parks in the A, R or C Zones). The 12 performance standards are reflected on the original stamped plan set and supplemental plans submitted in November 2023. A covenant was recorded by the applicant with Los Angeles County on

November 21, 2023. As demonstrated above, the project's compliance with each performance standard was either identified on the plans or the covenant.

For additional information, please contact Anna M. Vidal, Senior City Planner, at (213) 482-7079, or Anna.Vidal@lacity.org.

VPB:LW:MZ:AMV:RV



Address: 23416 S PRESIDENT AVE

APN: 7439003036

PIN #: 042B193 193

Tract: TR 24608

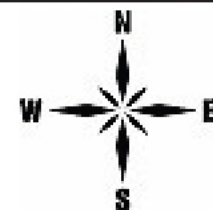
Block: None

Lot: 184

Arb: None

Zoning: R1-1XL-O

General Plan: Low Residential



(b) **Purposes:** The purposes of these Performance Standards are to provide for landscaping, open space, scale, bulk, height, yards and setbacks, particularly with regard to the main buildings, which are similar to those in the adjacent properties in the neighborhood. Signage, where permitted by City regulations, should not exceed in size or number of those located on the same block or across the street from the site. The noise levels created on the site should not increase the ambient noise level on adjoining or abutting properties after completion of the project. Public telephones on the site should be located to discourage loitering. Sufficient off-street parking should be provided to preclude the need for utilization of on-street parking by the use allowed on the site. The proposed use should be designed in a manner that will minimize the generation of loitering of individuals on or adjacent to the site. City streets should meet City standards in order to ensure safe vehicular ingress and egress to the site and to ensure that traffic does not exceed the current level of service. Ingress and egress to the main buildings or uses on the site are sufficient to accommodate expected usage by the public and/or occupants of the facility. Access to and from the site should be sufficient to meet police and fire safety needs beyond the explicit requirements of City codes as determined by the Police, Fire and Building and Safety Departments. Lighting on the site should not reflect on adjoining residential uses. Walls, fences, or other visible security devices should be similar to those on the adjoining properties. Graffiti should be prevented and eliminated when it is found on the site.

14.00.A.

7. **Recreational vehicle parks and mobile home parks** in the A, R or C Zones where any trailer, mobile home or recreational vehicle is permitted to remain longer than one day and which were lawfully created after the effective date of the ordinance adding this use to the Code.

(a) Performance Standards:

- (1) No buildings are higher than any main building on adjoining property or across a street or alley from the use;
- (2) The use is conducted in conformance with the City's noise regulations pursuant to Chapter 11 of this Code;
- (3) There is a solid decorative masonry or wrought iron wall/fence at least eight feet in height, or the maximum height permitted by the zone, whichever is less. The wall/fence encircles the periphery of the property and does not extend into the required front yard setback;
- (4) The front yard setback is at least as deep as the setback required by the zone;
- (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;
- (6) Parking areas are landscaped pursuant to the requirements of Section 12.21 A.6.;
- (7) Only one identification sign is displayed on the site and it is on the building face. The sign does not exceed 20 square feet, and does not extend more than 2 feet beyond the wall of the building, and does not project above the roof ridge or parapet wall (whichever is higher) of the building;
- (8) All graffiti on the site is removed or painted over in the same color as the surface to which it is applied within 24 hours of its occurrence;
- (9) **(Amended by Ord. No. 173,492, Eff. 10/10/00.)** The use meets the parking requirements of Section 12.21 A.;

(10) **(Amended by Ord. No. 173,492, Eff. 10/10/00.)** All streets, alleys or sidewalks adjoining the property meet standard street dimensions;

(11) **(Added by Ord. No. 173,492, Eff. 10/10/00.)** There are no outdoor public telephones on the site; and

(12) **(Added by Ord. No. 173,492, Eff. 10/10/00.)** Security night lighting is shielded so that the light source cannot be seen from adjacent residential properties.

(b) **Purposes:** The purposes of these Performance Standards are to provide for landscaping, open space, scale, bulk, height, yards and setbacks, particularly with regard to the main buildings, which are similar to those in the adjacent properties in the neighborhood. Signage, where permitted by City regulations, should not exceed in size or number those located on the same block or across the street from the site. The noise levels created on the site should not increase the ambient noise level so as to be disturbing to persons on adjoining or abutting properties after completion of the project. Public telephones on the site should be located to discourage loitering. Sufficient off-street parking should be provided to preclude the need for utilization of on-street parking by the use allowed on the site. The proposed use should be designed in a manner that will minimize the generation of loitering of individuals on or adjacent to the site. City streets should meet City standards in order to ensure safe vehicular ingress and egress to the site and to ensure that traffic does not exceed the existing level of service. Ingress and egress to the main buildings or uses on the site are sufficient to accommodate expected usage by the public and/or occupants of the facility. Access to and from the site should be sufficient to meet police and fire safety needs beyond the explicit requirements of City codes as determined by the Police, Fire and Building and Safety Departments. Lighting on the site should not reflect on adjoining residential uses. Walls, fences, or other visible security devices should be similar to those on the adjoining properties. Graffiti should be prevented and eliminated when it is found on the site.

8. **Shelters for the homeless** (as defined in Section 12.03) containing not more than 30 beds are permitted by right in the R3, M1, M2 and M3 Zones with reduced parking requirements.

(a) **Performance Standards:**

(1) There no other shelters for the homeless within 300 feet of the subject property;

(2) The use is conducted in conformance with the City's noise regulations pursuant to Chapter 11 of this Code;

(3) There are no outdoor public telephones on the site;

(4) No signs are present on the property relating to its use as a shelter for the homeless;

(5) No outdoor toilets are present on the site;

(6) All graffiti on the site is removed or painted over in the same color as the surface to which it is applied within 24 hours of its occurrence;

(7) At least ten percent of the number of parking spaces otherwise required by Section 12.21 A.4. are provided, and in no event are fewer than two spaces provided; and

(8) All streets, alleys or sidewalks adjoining the property meet standard street dimensions.

23416 S President Ave

Permit Application #: 24026 - 10000 - 00086

Nonbldg-Alter/Repair

City of Los Angeles - Department of Building and Safety

Plan Check #: B24LA13084FO

Commercial

24026 - 10000 - 00086

Plans Filed in: METRO

Regular Plan Check

CLEARANCE SUMMARY WORKSHEET

Printed On: 08/19/24 09:39:58

IMPORTANT: This summary documents the clearance(s) required prior to permit issuance. Most clearance(s) are granted electronically, however this form will also be completed so that in the event of a computer outage, there is evidence of the clearance action(s). Keep this form with all other documents necessary to obtain the permit.

INSTRUCTIONS

APPLICANT/REPRESENTATIVE: You are advised to initiate the approval process for the following permit application clearance(s) marked as "Not Cleared" as soon as possible, in order to allow adequate time to obtain the approvals. Certain departments (such as the Department of City Planning) may require additional plan review and approval process, which may include mandatory appeal periods. The address and phone number of the specific agency corresponding to the "Address Code:" shown for each clearance is indicated at the end of this form and it is recommended that you call before appearing in person. Remember to bring a copy of the permit application to the clearance agency for their reference. A "Cleared" condition requires no further action on your part.

CLEARANCE AGENCIES: For city agencies, perform electronic clearance action(s) using PCIS and complete this form. For non-city agencies or PCIS outages, complete this form.

Description of Work: SUPPLEMENTAL PERMIT TO PERMIT NUMBER 23020-10000-02232. USE OF LAND FOR NEW RECREATION VEHICLE PARK FOR PUBLIC BENEFIT PROJECT PER LAMC 14.00A7.

Building & Safety Contact

Plan Check Office: METRO

PC Engineer: Michael Lopez

Status	Clearance Description and New Status
Cleared	<p>Agency: City Planning Department Description: Front yard landscape per 12.21C1(g)</p> <p>Address Code: 2</p> <p>Electronic Clearance <input checked="" type="checkbox"/> By: <u>RVASQUEZ</u> Date: <u>08/01/24</u> Phone: _____</p> <p>Comments: Approved Per LAMC 14.00 A 7 Public Benefit Project; Plans stamp dated 08/01/2024; Per Covenant & Agreement recorded on 11/21/2023 (Instrument #: 20230807676); Per fees paid on 11/14/2023 for \$741.69 (Invoice #: 91949; Receipt #: 2023318005-69).</p>
Cleared	<p>Agency: City Planning Department Description: Miscellaneous Approval for: Review of conditions for a proposed RV park as a public benefit project per LAMC 14.00A.7.</p> <p>Address Code: 2</p> <p>Electronic Clearance <input checked="" type="checkbox"/> By: <u>RVASQUEZ</u> Date: <u>08/01/24</u> Phone: _____</p> <p>Comments: Approved Per LAMC 14.00 A 7 Public Benefit Project; Plans stamp dated 08/01/2024; Per Covenant & Agreement recorded on 11/21/2023 (Instrument #: 20230807676); Per fees paid on 11/14/2023 for \$741.69 (Invoice #: 91949; Receipt #: 2023318005-69).</p>
Cleared	<p>Agency: City Planning Department Description: Parking lot w/ >20 cars per 12.21A6(g) or (h), or >6 cars per 12.42B</p> <p>Address Code: 2</p> <p>Electronic Clearance <input checked="" type="checkbox"/> By: <u>RVASQUEZ</u> Date: <u>08/01/24</u> Phone: _____</p> <p>Comments: Approved Per LAMC 14.00 A 7 Public Benefit Project; Plans stamp dated 08/01/2024; Per Covenant & Agreement recorded on 11/21/2023 (Instrument #: 20230807676); Per fees paid on 11/14/2023 for \$741.69 (Invoice #: 91949; Receipt #: 2023318005-69).</p>

Cleared	<p>Agency: Department of Building and Safety Description: Condition of Approval of Disabled Access corrections</p> <p>Address Code: 4</p> <p>Electronic Clearance <input checked="" type="checkbox"/> By : <u>MLOPEZ</u> Date: <u>07/25/24</u> Phone: _____</p> <p>Comments: 1. No Change in Accessible parking provided; Referece Original Permit # 23020-10-02232.</p>
Cleared	<p>Agency: Bureau of Sanitation Description: Obtain Watershed Protection Div. clearance for Low Impact Development (LID)</p> <p>Address Code: 19</p> <p>Electronic Clearance <input checked="" type="checkbox"/> By : <u>MFRAGOSO</u> Date: <u>08/17/24</u> Phone: _____</p> <p>Comments: Stormwater Observation Report (SOR) required before final sign off or issuance of certificate of occupancy (CfO). Approved for 43,473 SF of permeablehardscape for incidental rain, per approved LID plans. Overflow directly to street through an approved City of Los Angeles, Building and Safety, and Bureau of Engineering standards. (1 Sheets)</p>

End of Clearance(s) for 24026 - 10000 - 00086. Refer to "ADDRESS CODES" sheet for clearance agency address/phone information.

NOTES:

THIS IS A 46 SPOT RV PARK BEING BUILT UNDER LAMC 14.00 A 7 PUBLIC BENEFIT PROJECT
EACH RENTAL SITE HAS ROOM FOR PARKING 1 RV AND 1 VEHICLE
FOR ALL PERFORMANCE STANDARDS METRICS SEE PAGE 2
THE PROJECT MEETS LOS ANGELES PARKING REQUIREMENTS AND ADA PARKING REQUIREMENTS
THERE ARE NO PAY PHONES LOCATED ON THE PROPERTY.
ALL LIGHT IS SHIELDED FROM ADJOINING AND ADJACENT PROPERTIES
PROPERTY HAS EXISTING CEMENT BLOCK FENCE ON 2 SIDES (SIDES 8' IN HEIGHT, FRONT IS 8' WROUGHT IRON AND SET BACK 20' FROM FRONT PROPERTY LINE, FENCE ON REAR OF PROPERTY IS 2' TALL BLOCK FENCE WITH 6' WROUGHT IRON ON TOP, IS ADJACENT TO RAILROAD TRACKS
PROPERTY WILL HAVE 10' LANDSCAPE BUFFER AROUND PERIPHERY OF PROPERTY WITH IRRIGATION SYSTEM

Landscaping requirements
Total sq ft of parking 46136 sq ft.
4% = 1845.5 sq ft
1/4 credit for street trees = 461.4 sq ft
front yard landscape - 4000 sq ft
4% exceeded

This project is CEQA Exempt
California Code of Regulations Title 14, Section 15268, mentions that projects are exempt from the requirements of the California Environmental Quality Act (CEQA)

Exhibit D
Page 14

P-1

REVISION TABLE	DESCRIPTION
NUMBER	DATE

SITE PLAN

SILVER RV PARK
23414 S PRESIDENT AVE
LOS ANGELES CA 90710
SILVER RV PARK CORPORATION, STUART SILVER-CEO
4712 ADMIRALTY WAY, MARINA DEL REY CA 90292
818-268-5372

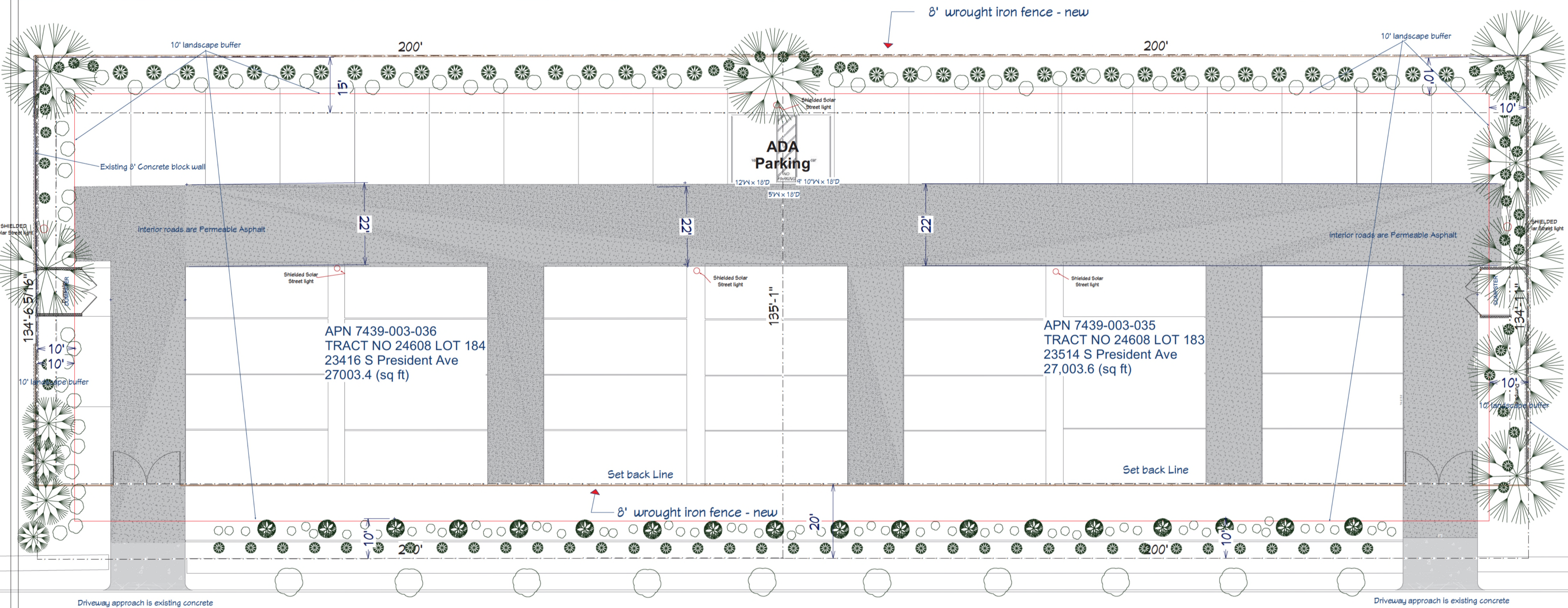
DRAWINGS PROVIDED BY:
DOUG ROSS
1025 MCFARLAND AVE
WILMINGTON, CA 90744
424-533-2936

DATE:
7/25/2024

SCALE: 1/16" = 1'

SHEET:

P-1



(310) 925-1444 23416 President Ave

4' x 5' 5' sign to be mounted to right of left entry gate

Project is compliant with applicable Performance Standards, Codes and Regulations set forth by:
City of Los Angeles Planning Dept. Public Benefit Project
City of Los Angeles Fire Department
State of California Department of Housing and Community Development/Specia Occupancy/RV Park
State of California Health and Safety Code
State of California Code of Regulations, Title 24
Building Code & Energy Efficiency Standards
State of California Code of Regulations, Title 25
Divisions I, Chapter 2
Requirements of Utility Providers to establish service

Landscaping consist of:

Across front:
Existing boxwoods
Crepe Myrtle Trees
English Ivy

Adding miniature olive trees
seasonal color/ground cover
Back
36 Italian cypress
36 Boxwoods
seasonal color/ground cover

sides, existing torrey pines
english ivy on fence
adding
8 queen palms
seasonal color/ground cover

PLANS APPROVED
City of Los Angeles
Department of City Planning
DATE: 08/01/2024
PAGE NO: 1 of 3
CASE NO: 24026-10000-00086
PLANNER: Ruben Vasquez
NOTES: Supplemental Permit to 23020-10000-02232

Prevailing Setback calculations

Number of lots: 3
Prevailing Setback: 17.67 ft
Calculation
Total no of lots entered: 3
Total frontage entered: 150.00 ft
40% from total frontage entered: 60.00 ft
No of lots used in the calculation: 3
Setback range used: 14.00 ft - 23.00 ft
Total frontage used in the calculation: 150.00 ft

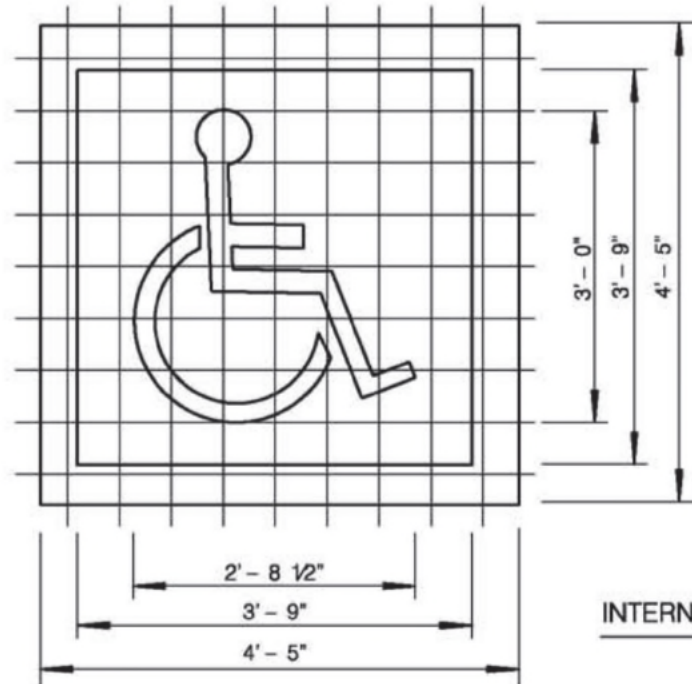
Lot	Frontage (ft)	Setback (ft)
1414	50.00	14.00
1500	50.00	16.00
23528	50.00	23.00

New front and rear fence detail
8' wrought iron located at front and rear of property



WALL SCHEDULE
2D SYMBOL: WALL TYPE(S)
EXISTING 8' CONCRETE BLOCK WALL, SIDES OF PROPERTY
NEW 8' WROUGHT IRON FENCE FRONT AND REAR

Number	Title	Comments
1	SITE PLAN	
2	PERFORMANCE STANDARDS	
3	ADA/FIRE/LANDSCAPE	
4	LOCAL APPROVALS	
5	Capped Well Locations	
6	ELECTRICAL	
7	ELECTRICAL 2	
8	ELECTRICAL 3	
9	GRADING	
10	SEWER	
11	WATER	
12	NOTES	



INTERNATIONAL SYMBOL OF ACCESSIBILITY
PAVEMENT SYMBOL SHALL BE PAINTED WHITE
ON BLUE BACKGROUND.

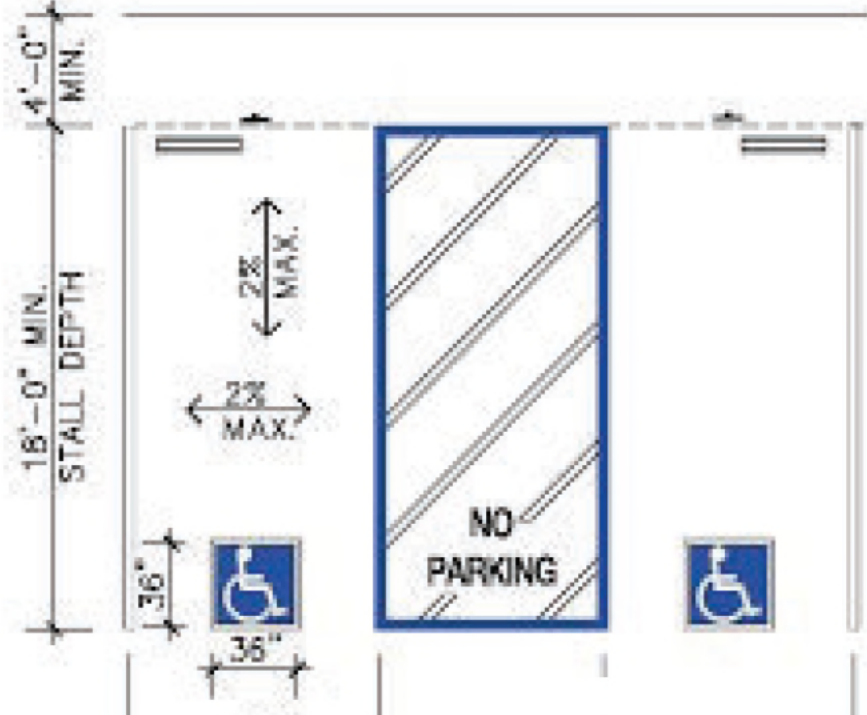
BLUE COLOR TO MATCH COLOR A 15090 IN THE
FEDERAL STANDARD 595A AS SPECIFIED IN
SECTION 522(B) 2.

ISA SYMBOL SHALL BE LOCATED SO THAT IT IS
VISIBLE TO TRAFFIC ENFORCEMENT OFFICER
WHEN THE VEHICLE IS PARKED IN THE SPACE.

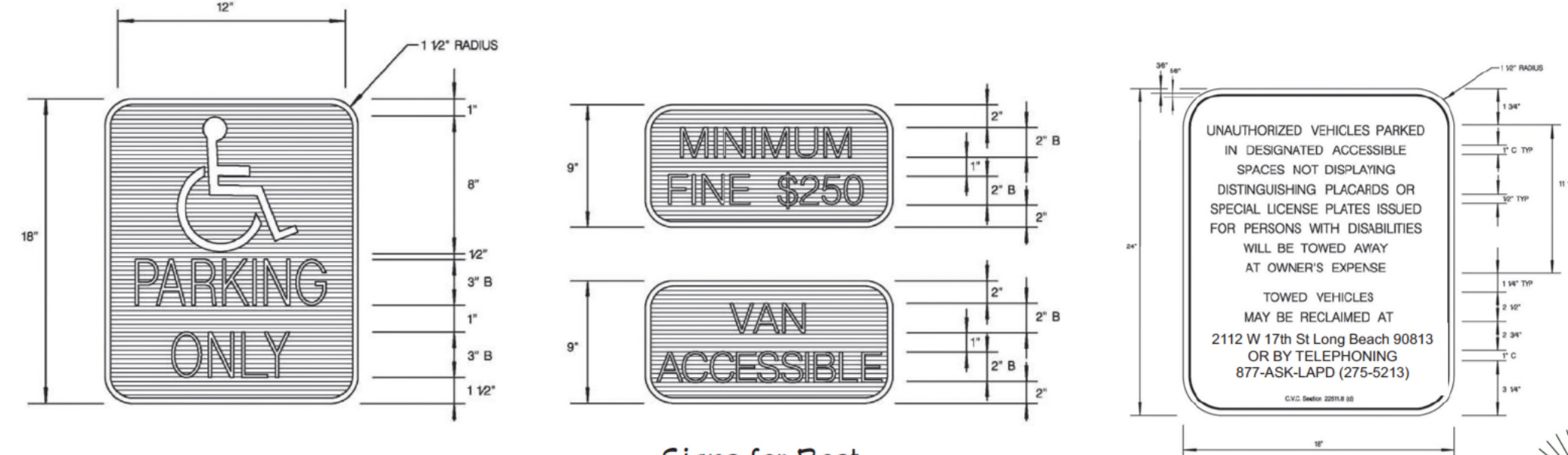
INTERNATIONAL SYMBOL OF ACCESSIBILITY (ISA)

NO PARKING

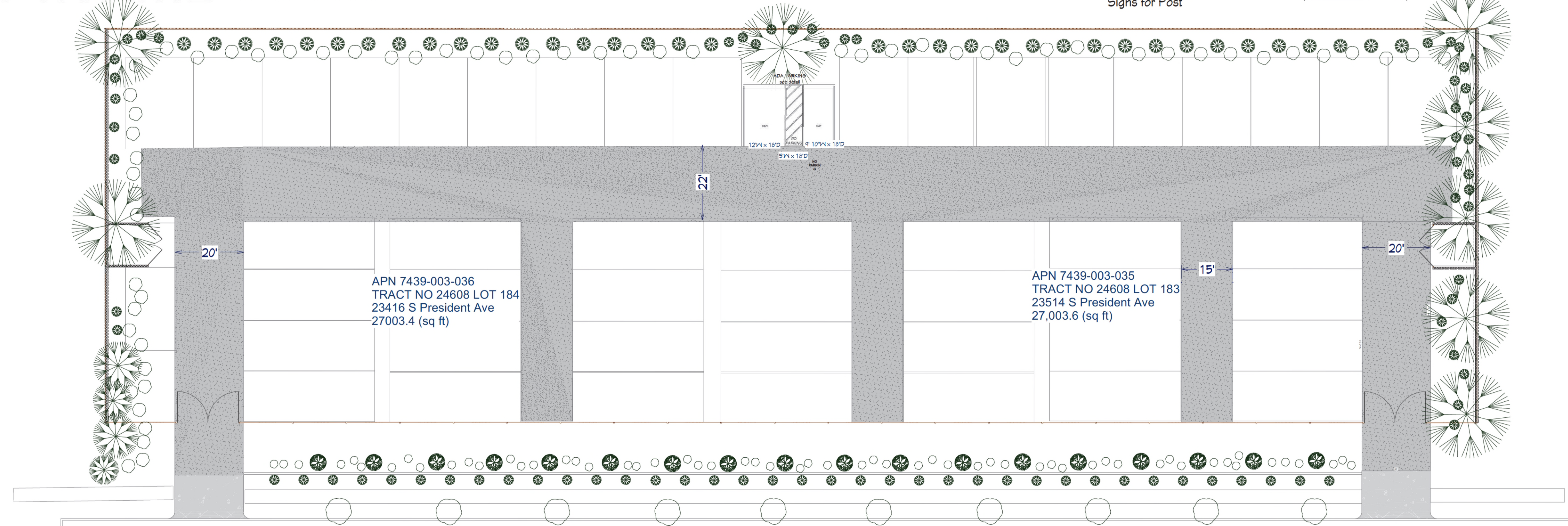
THE WORDS "NO PARKING" SHALL BE PAINTED IN
WHITE LETTERS NO LESS THAN 12" HIGH LOCATED
AT THE END OF THE ACCESS AISLE SO THAT IT IS
VISIBLE TO TRAFFIC ENFORCEMENT OFFICIALS



- PARKING SIGNS
1. POST MOUNTED SIGNS SEE M 45 FOR BREAK AWAY SIGN POST
 2. SIGNS SHALL BE CONSTRUCTED OF A MINIMUM 1016 THICK ALUMINUM
 3. SIGN 1 COLORS: BORDER, TEXT AND SYMBOL WHITE (RETROREFLECTIVE) BACKGROUND BLUE (RETROREFLECTIVE) FONT SANS SERIF CLEARVIEW
 4. SIGN 2 COLORS: THE SIGN HAS A WHITE REFLECTIVE BACKGROUND WITH NON REFLECTIVE BLACK BORDER AND TEXT. BLANK SPACES MUST BE FILLED WITH APPROPRIATE INFORMATION AS A PERMANENT PART OF THE SIGN AT THE TIME OF FINAL INSPECTION
 5. AN ADDITIONAL TOWING SIGN SHALL BE POSTED IN A CONSPICUOUS PLACE AT EACH ENTRANCE



Signs for Post



PLANT SCHEDULE			
2D SYMBOL	NUMBER	QTY	COMMON NAMES
	P01	10	GRAPE MYRTLE GREPE MYRTLE
	P02	70	ENGLISH COMMON BOXWOOD
	P03	8	KING PALM ALEXANDRA PALM ALEXANDER PALM
	P04	3	LIMBERPINE
	P05	36	MEDITERRANEAN CYPRRESS TALIAN CYPRRESS FUNERAL CYPRRESS
	P06	1	MEDITERRANEAN FAN PALM EUROPEAN FAN PALM
	P07	60	CREEPING PHLOX
	P08	50	BARBERRY
	P09	10	OLIVE TREE 1

PLANS APPROVED
City of Los Angeles
Department of City Planning

DATE: 08/01/2024 PAGE NO. 3 of 3
PCIS NO: 24026-10000-00086
CASE NO: N/A
PLANNER: Ruben Vasquez
NOTES: Supplemental Permit to 23020-10000-02232

REVISION TABLE	
NUMBER	DATE

ADA/FIRE/
LANDSCAPE

SILVER RV PARK
23414 S PRESIDENT AVE
LOS ANGELES CA 90710

SILVER RV PARK CORPORATE ON STUART SILVER-CEO
4712 ADM RALLY WAY MARINA DEL REY CA 90292
818-268-5372

DRAWINGS PROVIDED BY:
DOUG ROSS
1025 MCFARLAND AVE
WILMINGTON, CA 90744
424-533-2936

DATE:
7/25/2024

SCALE: 1/16"=1'

SHEET:

P-3

**INSTRUCTIONS:****PUBLIC BENEFIT PROJECTS (PUB) INSTRUCTIONS**

ZONING CODE SECTIONS: Performance Standards in 14.00 A and Compliance Procedures in 14.00 B.

READ BEFORE PROCEEDING

Applying for a Public Benefit project approval is a two-step process (except for Unpermitted Dwelling Units):

Preliminary

Step: For Unpermitted Dwelling Units only, complete the Unpermitted Dwelling Unit (UDU) Inter-Agency Referral Form (CP-7835), submit plans to the Department of Building and Safety for Plan Check processing, and coordinate the Affordable Housing Covenant with the Housing and Community Investment Department.

Step One: Filling out a Performance Standard checklist/worksheet to determine Performance Standard Compliance, and whether project is permitted by right.

Step Two: Compliance procedure for project not meeting all Performance Standards.

For the preliminary step, applicants must coordinate with the staff at the Planning Department (DSC Housing Services Unit) to confirm the project meets the eligibility criteria.

For steps one and two supporting proof and documentation to substantiate compliance with Performance Standards must be provided to City staff for evaluation purposes. Substantiation shall include, but not be limited to: plans and elevations, maps, signed statements from "independent verifiers (e.g., acoustical consultant)," and City departments. In addition, a signed and sworn Covenant and Agreement is required for each Public Benefit project which acknowledges that all Performance Standards will be met, as set forth in Section 14.00 LAMC.

This instruction sheet should be used by the applicant, in consultation with the Public Counter staff to determine whether a Public Benefit use meets all required performance standards. Please turn to Paragraph 15 and answer the questions to determine whether a project is permitted as a matter of right. If all performance standards for a use are met, and answered "yes" in the appropriate checklist, a project is **PERMITTED**. Where performance standards are **NOT** met, alternative compliance procedures, under Section 14.00 B, shall be followed, as well as the following paragraphs of this instruction sheet.

The **MASTER LAND USE APPLICATION INSTRUCTION SHEET-500' RADIUS** should also be followed.

1. **ADDITIONAL INFORMATION:** Please provide the following to assist the decision maker:
 - a. Describe briefly the type of use and improvement proposed. State whether new buildings are to be constructed, existing buildings are to be used or additions made to existing buildings.
 - b. Where applicable the following items shall be delineated on plans in accordance with the applicable Zoning Code Section:
 - 1) Exterior walls
 - 2) Lighting plans
 - 3) Landscaped and irrigated areas in the parking area
 - 4) Location of trash storage area(s)
 - 5) Location of other storage area(s)
 - 6) Parking layout indicating striping, landscaping, and driveways

- c.. Plans provided should illustrate how compliance with all applicable Performance Standards and purposes are met, as set forth in Section 14.00 of the Los Angeles Municipal Code.
- d. Other Supportive Evidence including documents and photographs will be required to substantiate compliance with Performance Standards.
- e. Additionally, for Unpermitted Dwelling Units (UDU) only, provide the following:
 - 1) The completed and signed original copy of the "UDU Interagency Referral Form".
 - 2) Evidence of the pre-existing unit acceptable to the Department of City Planning's Housing Services Unit.

2. **PUBLIC BENEFIT PROJECT CHECKLIST:** The following public benefit uses are permitted, provided they meet the performance standards set forth below (and answered "yes"). Otherwise, where there is an answer of "no," an approval of alternative compliance measures, pursuant to Section 14.00 B, will be required.

Which Public Benefit use is being applied for? _____

Please proceed to the use requested below and answer only performance standard items for that use. Any "No" answer requires an additional approval under Section 14.00 B.

PERFORMANCE STANDARDS

- d. **Mobile home parks where any trailer or mobile home is permitted to remain longer than one day and which were lawfully in existence on December 6, 1986 (Sec. 14.00 A 4).**

Please Write: Yes or No

- | | | |
|-----|---|-------|
| 1) | No buildings are higher than any main building on adjoining property or across a street or alley from the use. | _____ |
| 2) | The use is conducted in conformance with the City's noise regulations pursuant to Chapter 11 of this Code. | _____ |
| 3) | There is a solid, decorative, masonry or wrought iron wall/fence at least 8 feet in height, or the maximum height permitted by the zone, whichever is less. The wall/fence encircles the periphery of the property and does not extend into the required front yard setback. | _____ |
| 4) | The front yard is at least as deep as the setback required by the zone. | _____ |
| 5) | The property is improved with a 10-foot landscaped buffer along the periphery of the property, which is maintained and is equipped with an automatic irrigation system. | _____ |
| 6) | Parking areas are landscaped pursuant to the requirements of Section 12.21 A 6. | _____ |
| 7) | All graffiti on the site is removed or painted over in the same color as the surface to which it is applied within 24 hours of its occurrence. | _____ |
| 8) | Only one identification sign is displayed on the site and it is on the building face. The sign does not exceed 20 square feet, and does not extend more than 2 feet beyond the wall of the building, and does not project above the roof ridge or parapet wall (whichever is higher) of the building. | _____ |
| 9) | The use meets the parking requirements of Section 12.21 A. | _____ |
| 10) | All streets, alleys and sidewalks adjoining the property meet standards street dimensions. | _____ |
| 11) | There are no outdoor public telephones on the site. | _____ |
| 12) | Security night lighting is shielded so that the light source cannot be seen from adjacent residential properties. | _____ |

SUMMARY OF PARKING REGULATIONS

Exhibit F

Please be aware that areas that are

- located within Specific Plans, Interim Control Ordinances, or special districts may have different parking requirements than provided in this Information Bulletin.
- Projects eligible to use AB 2097 as indicated on ZIMAS parcel profile report at the time of plan check submittal are able to utilize reduced parking requirements. Hotels, motels, bed and breakfast inns or other transient lodging except where a portion of a housing development project is designated for use as a residential hotel, are not eligible for AB 2097 reduce parking requirements.

SECTION 12.21A.4(c) – COMMERCIAL AND INDUSTRIAL BUILDINGS	Ratio (spaces/sq ft)
Use of Building (or portions of) *	
1. Health or Athletic Club, Bath House, Gymnasium, Video arcades, Karaoke, Laser tag or similar and Pool Hall (use total floor area minus the pool tables)	1 per 100
2. Studio for dance, yoga, martial art smaller than 1000 sq ft and with no more than 10 occupants at any given time (note such limitations on the Building Permit)	1 per 500
3. Skating/Roller Rinks, Bowling Alleys (Bowling Area), Basketball Court (including court surface); Sitting or viewing area at 1 per 100; with stadium seating for spectators 1 per 35 or 1 per 5 fixed seats. Bowling Lanes in a bowling alley can be calculated at 1 per 500.	1 per 100 (more parking required for viewing or seating area)
4. Restaurant, Café, Coffee Shop, Bar, Night Club, Banquet/Dance Hall or similar	1 per 100
5. Small Restaurant, Café, or Coffee Shop (1,000 sq. ft. or less)	1 per 200
6. Retail, Take-Out Restaurant (no seating), Art Gallery (retail) or Discount Wholesaler selling to the general Public, Gold buying	1 per 250
7. Wholesaler not selling to the general Public	1 per 500
8. Retail Furniture, Major Appliances, or similar	1 per 500
9. Professional Office or other Business/services such as Dry Cleaner, Coin-laundry, Beauty Salon, Art Studio (no retail), Museum, Travel Agency, kennel, animal clinic, animal hospital.....similar	1 per 500
10. School for adult: Trade, Music, Professional, or similar as defined in code section 12.21A.4(c)(7)	
a. Classroom or assembly area	1 per 50 or 1 per 5 fixed seats
b. Laboratory or Classroom with heavy equipment	1 per 500
11. Adult Care Facility	1 per 500
12. Warehouse or Storage (for Household Goods) - Parking shall be calculated for each building; Refuse Transfer Station ⁶	1 per 500 (1 st 10,000 sq ft) + 1 per 5,000 after
13. Light manufacturing uses such as data retrieval, record management, research and development, information processing, electronic technology or multi-media productions	1 per 500
14. Auto Dismantling Yard, Junk Yard or Open Storage in the M2 or M3 zones [Sec. 12.19 A.4(b)(4) and Sec. 12.20 A.6(b)(3)]	6 for the first acre, 1 per 12,000 sq ft for the second acre, and 1 for each acre after
15. Used vehicle sales /auto repair garage per Sec. 12.26.F (exception: display of not more than 3 vehicles for purpose of sale or trade at any one time)	1 per 2000 of outdoor vehicle sales area (min. 2 stalls) + parking as required for the building
SECTION 12.21A.4(d) – INSTITUTIONS: Use of Building (or portions of)*	Ratio (spaces/sq ft or unit)
1. Philanthropic Institution, Museum, Government Office, or similar	1 per 500
2. Medical Office, Clinic, or Medical Service Facility	1 per 200
3. Sanitarium or Convalescent Home	The greater of 1 per 500 or min 0.2 per bed
4. Hospital	2 per patient bed

*Exceptions for Section 12.21A.4(c), (d), (e) and (f)

- Any roofed Outdoor Eating Areas in connection with restaurants, cafes or other eating/refreshment establishments will provide parking as required except for ground floor "Outdoor Eating Area" as defined per Section 12.03 of the Zoning Code. No parking is required for any UNROOFED Outdoor Eating Areas such as patios, terraces or roof decks.
- For any Specific Plans published prior to May 21, 1990, required parking shall be based on Specific Plan or Section 12.21A.4 whichever is required more parking.
- Read 12.21A.4(j) for combination of uses inside an office building or an industrial-use lot. Exception 12.21A.4(j)(3) can be applied to retails, health club or any commercial uses per section 12.21A.4(c) for an office building greater than 50,000 sq ft.
- For church, gyms or any assembly, every 24" of bleacher or pew (if no delineated seats or cushions for each person) is considered as one seat.

5. Warehouses built prior to Sept 8, 1950 can be considered as Industrial Use for nonconforming parking per LADBS' 10/06/1997 memo.
6. **Refuse Transfer Station** - Parking requirements are same as warehouse use per ZA Memo No. 135 (04/03/2020)
7. For existing buildings per Ord.#182,110 (amending section 12.21A.4(m)), Department of Building and Safety may reduce the number of required parking spaces by the number of spaces which the LADBS determines are needed to provide disabled parking spaces required by the State access laws.

SECTION 12.21A.4(e) and (f) – ASSEMBLY AREA AND SCHOOLS: Use of Building (or portions of)*	Ratio (spaces/sq ft or unit)
1. High School/College Auditorium; Stadium; Theater; Bingo Parlors more than 50 occupants; or similar assembly	1 per 35 sq. ft. or 1 per 5 fixed seats
2. Church (The greater of the main sanctuary or main assembly area)	1 per 35 sq. ft. or 1 per 5 fixed seats
3. Schools (Private or Public)	//////////
a. Elementary/Middle – K thru 8 th grade	1 per classroom (on-site only)
b. 9 th thru 12 th grade	The greater of auditorium, any assembly or 1 per 500 of total building area
4. Facility for 12th graders and under including Child Care, Counseling Facility, After School Program for tutoring or athletic facility	The greater of 1 per 500 of total building area or 1 per classroom for K thru 8 th grade

SPECIAL DISTRICTS: Use of Building (or portions of)	Ratio spaces/sq ft or unit
1. Downtown Parking District (DPD) - 12.21 A.4(i)(1) – Auditoriums and other similar places of assembly	1 per 10 fixed seats or 1 per 100 sq ft
2. Downtown Parking District (DPD) - 12.21 A.4(i)(2) and (3) – Hospitals, philanthropic institutions, governmental offices buildings, medical offices and all uses as listed in Section 12.21A.4(c) (No parking for any uses listed in Section 12.21A.4(c) when the total commercial use is smaller than 7,500 sq ft in gross floor area)	1 per 1000 for all uses in Section 12.21A.4C
3. Downtown Parking District (DPD) - 12.21 A.4(i)(3) - warehouse	1 per 1000 (1 st 10,000 sq ft) + 1 per 5,000 after
4. Community Redevelopment Areas & Enterprise Zones outside of DPD District - 12.21A.4(x)(3) for medical office, clinic and all commercial uses in Sec. 12.21A.4(c)	1 per 500
5. Historical Buildings (National Register of Historic places or State or City historical or cultural monuments) – 12.21 A.4(x)(2)	No change in parking in connection with change of use.

SECTION 12.21A.4(a) and (b) – Use of Building (or portions of)**	Ratio (spaces/sq ft or unit)
1. One-Family Dwelling (SFD) or group of one family dwellings	2 (on-site only)
2. Apartment or Two-Family Dwelling (Duplex)	//////////
a. units > 3 habitable rooms (such as a typical 2 bedroom unit)	2 (on-site only)
b. units = 3 habitable rooms (such as a typical 1 bedroom unit)	1.5 (on-site only)
c. units < 3 habitable rooms (such as a typical single unit)	1 (on-site only)
3. Hotel, Motel, Boarding House or Dormitory ⁷ including accessory facilities	//////////
a. first 30 guestrooms / a suite in a Hotel	1
b. next 30 guestrooms / a suite in a Hotel	One half
c. remaining guestrooms / a suite in a Hotel	One third
d. Multi-purposes assembly room >750 sq ft inside a hotel or motel	1 per 35 sq. ft. or 1 per 5 fixed seats
e. Restaurants > 750 sq.ft and not intended for hotel guests	1 per 100 sq. ft.
4. Condominiums	Planning's tract condition
5. Mobile Homes Park (Title 25 of the California Administrative Code)	N/A

***See Footnotes on Page 1 of 2.**

****Exceptions for Section 12.21A.4(a) and (b):**

1. Subject to the Hillside Ordinance or the **Baseline Hillside Ordinance**, an SFD may require up to a maximum of 5 parking spaces.
2. Residential located inside the **Central City Parking District (CCPD)** may have reduce parking as follows:
 - a) Provide 1 parking per dwelling unit. When more than six dwelling units having more than 3 habitable rooms per unit on the site, the parking for these units shall be at 1/4.
 - b) Provide 1 parking for each 2 guestrooms for first 20, 1 for each 4 guestrooms for next 20, 1 for each 6 guestrooms for the remaining.
3. **SFD on a narrow lot, 40 ft or less in width and not abutting an alley** requires only one parking space. However, this reduction shall not apply to lots fronting on a substandard street in A1, A2, A, RE, RS, R1 and RD zones. 12.21A.4(q).

As a covered entity under Title II of the Americans with Disabilities Act, the City of Los Angeles does not discriminate on the basis of disability and, upon request, will provide reasonable accommodation to ensure equal access to its programs, services and activities.

4. Any **commercial vehicle** which exceeds a registered net weight of 5600 lbs shall not be considered as an accessory residential use.
5. **Affordable Housing Incentives** – Parking Options are available for Housing Development Projects pursuant to 12.22 A.25(d).
6. **Elder Care Facilities** – Reduced parking for special housing types pursuant to 12.21 A.4(d)(5).
7. Every 100 sq ft of superficial floor area in a **dormitory** shall be considered as a separate guest room.
8. **Bicycle parking** is required per Section 12.21A.16.

9. Section 4.106.4.2.2 of the 2023 Los Angeles Green Building Code requires
 - a. multi-family dwellings with **less than 20 dwelling units** to have a minimum
 - i. Thirty (30) percent of the total number of parking spaces on the building site to be **EV Capable** (capable of supporting future Level 2 electrical vehicle charging spaces (EVCS),
 - ii. Twenty-five (25) percent of the total number of parking spaces on the building site to be **EV Ready** (equipped with low power Level 2 EV charging receptacles). For multifamily dwelling parking facilities, no more than one receptacle is required per dwelling unit when more than one parking space is provided for use by a single dwelling unit. The number of EV Ready parking spaces may be counted toward the total number of EV Capable parking spaces required for the building per 04.106.4.2.1. Item 1.
 - b. multi-family dwellings with **more than 20 dwelling units** to have a minimum
 - i. Thirty (30) percent of the total number of parking spaces on the building site to be **EV Capable** (capable of supporting future Level 2 electrical vehicle charging spaces (EVCS),
 - ii. Twenty-five (25) percent of the total number of parking spaces on the building site to be **EV Ready** (equipped with low power Level 2 EV charging receptacles). For multifamily dwelling parking facilities, no more than one receptacle is required per dwelling unit when more than one parking space is provided for use by a single dwelling unit. The number of EV Ready parking spaces may be counted toward the total number of EV Capable parking spaces required for the building per 04.106.4.2.1. Item 1.
 - iii. Ten (10) percent of the total number of parking spaces on the building site to be **EV Chargers** (equipped with Level 2 EV charging receptacles).

EXHIBIT B

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Ref: 85397-0001

June 23, 2025

BY EMAIL ONLY

President Lawshe
Members of the City Planning Commission
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eva.m.bencomo@lacity.org
cecilia.lamas@lacity.org

Re: Case Number: DIR-2024-7352-BSA
Response to Appellant's April 22, 2025 Justification to Appeal
Property Address: 23416 S President Ave., Los Angeles
City Planning Commission Hearing Date: June 26, 2025

Dear President Lawshe and Members of the City Planning Commission:

Our office represents Oceans 11 RV Park, LLC ("Oceans 11"), the owner of 23416 S. President Avenue, Los Angeles (the "Site"), and the applicant for ministerial permits to develop a recreational vehicle park ("RV") park as a by-right Public Benefit Project under LAMC Section 14.00A(7) (the "Project"). On June 13, 2025, we submitted a letter on behalf of Oceans 11 to address Concerned Residents of Green Meadows West's ("Appellant") appeal of the Director of Planning's April 9, 2025, Letter of Determination ("LOD").

On June 16, 2025, Appellant submitted a "Letter to CPC" in support of its appeal. Appellant's letter repeats arguments that were fully considered and rejected by both DBS and the Planning Director. The letter also alleges that the onsite conditions do not comply with the performance standards for a Public Benefit Project even though construction is not complete, final inspections have not yet occurred, and the City has not even reactivated the Project's original permit that was issued back in March 2024 and/or issued its supplemental permit that was cleared for approval back in August 2024 and which, according to the City, is forthcoming.

The following serves to supplement our June 13, 2025, correspondence and rebut Appellant's allegations. We reiterate our request that the CPC deny the latest appeal and sustain the LOD.

I. The Special Occupancy Parks Act Does Not Control Local Land Use

Appellant again incorrectly argues that the Special Occupancy Parks Act ("SOPA") requires the applicant to obtain a Conditional Use Permit ("CUP") from the City to permit an RV park. A plain reading of the statute, the legislative context, and the California Department of Housing and Community Development's ("HCD") own guidance materials make clear that Appellant misunderstands the scope and purpose of SOPA.

First, SOPA's core purpose is to protect public health and safety within the parks themselves, not to determine where such parks may be located. That authority belongs squarely to local agencies. Gov. Code § 65800 et seq.

Second, Appellant misreads Health & Safety Code § 18866.2, which states that "Any person may file an application with the governing body of any city, city and county, or county for a conditional use permit for a special occupancy park..." (emphasis added). The term "may" is permissive, not mandatory. The statute does not require a CUP; it merely authorizes an applicant to apply for one if the local jurisdiction's zoning ordinance requires it. The remainder of Section 18866.2 simply outlines the public hearing procedures a local agency will follow if it requires a CUP.

Third, HCD—the state agency tasked with enforcing SOPA—has made clear that zoning and land use determinations are the exclusive domain of local governments. HCD issued an April 21, 2008 Information Bulletin on the "Validity of local ordinances relating to installation of new manufacturer homes and/or sale or conversion of mobilehome parks," which states that "Throughout this memorandum, there are references to "manufactured homes", "mobilehome parks" and "the Mobilehome Parks Act"; however, unless otherwise noted, the same issues and rules apply to recreational vehicles...recreational vehicle parks, and the Special Occupancy Parks Act." <https://www.hcd.ca.gov/sites/default/files/docs/building-standards/ib-2008-10.pdf>. The bulletin then discusses Health and Safety Code section 18300, which lists the scope of local government authority. The statute states in relevant part that state law "shall not prevent local authorities" from enacting zones or establishing types of uses and locations within the jurisdiction where RV parks are allowed. The Bulletin states "subdivision(g) of H&SC section 18300 provides express authority for local governments...to adopt zoning ordinances to allow or prohibit parks and certain park uses..." to establish park density, to require recreational facilities, and "to approve or deny approval for any construction permit to build or increase the size of a park..." It specifies that "with respect to construction of a new or expanded park...HCD regulations require evidence of local approvals from the local planning agency." Exh. A.

HCD's website also makes it clear that local agencies govern the zoning and land use approvals for RV parks whereas HCD oversees health and safety standards for them. For example, HCD's website states that applicants must "[o]btain any necessary local agency approvals and complete all necessary plans, calculations, engineering, etc. required for processing [] application[s]" to permit a special occupancy park.
https://www.hcd.ca.gov/building-standards/permits-and-inspections?utm_source=chatgpt.com.

The HCD website also states that "[a] construction permit is required when developing a new mobilehome park or special occupancy park" and that among the "local government approvals...[that] must accompany all construction project permit applications" is "[w]ritten approval or a conditional use permit from the local planning agency." (emphasis added).
https://www.hcd.ca.gov/manufactured-and-mobilehomes/mobilehome-parks/park-construction-and-alterations?utm_source=chatgpt.com ("The required written approvals may be in letter form issued by the agency having authority to grant such an approval or simply a signature on the affected plans by the approving agency's authorized agent.").

Thus, according to HCD itself, zoning and land use is left to the local agencies. Nothing in SOPA requires that a CUP be obtained, and the City remains fully empowered to determine—through its own zoning code—whether and how to permit an RV park. If the City has deemed the project consistent with its zoning and ministerially approvable under LAMC § 14.00.A.7, no CUP is required. We respectfully request that the Commission reject the appeal on this ground.

II. LAMC Section 12.03 Does Not Modify Section 14.00 For Public Benefit Projects

See our office's June 13, 2025, letter addressing Appellant's erroneous argument that Section 12.03 imposes a CUP requirement for RV parks. Section 14.00.A.7 unquestionably provides a ministerial pathway for permitting an RV park. Appellant admits as much in its June 16, 2025, letter where it states "LAMC § 14.00.A provides that uses which do not meet the performance standards set forth therein require a CUP"—i.e., a CUP is not required if the use meets the performance standards.

III. Profit Motive Does Not Disqualify a Public Benefit Project

See Oceans 11's June 13, 2025, letter explaining that the zoning code does not require that a project be operated by a nonprofit organization in order to qualify for ministerial approval under LAMC Section 14.00.A.7. The Planning Director correctly rejected the contention that a project "for-profit" somehow defeats Public Benefit Project eligibility under Section 14.00 of the LAMC.

IV. DBS And Planning Have Repeatedly Determined That The Project Meets All Twelve Performance Standards

The remainder of Appellant's arguments pertain to Oceans 11's building plans, which have nothing to do with zoning determinations or interpretations. As the Director of Planning

correctly found, “whether a plan checker accurately reviewed and/or corrected project plans, or whether what was constructed matches those plans are not issues appealable to the Zoning Administrator.” Nor are they now appealable to the Commission. Those are issues within DBS’ jurisdiction. Nevertheless, Oceans 11 briefly addresses Appellants’ flawed arguments below.

A. Appellant Alleges That Onsite Conditions Do Not Comply With Performance Standards Nos. 3, 4, 5, 6, And 8 Before The Project Is Even Complete.

Fatal to Appellant’s appeal is its accusations that the onsite conditions of the Property fail to satisfy the performance standards even though construction is not complete, the City still has not reactivated Oceans 11’s permit or issued its supplemental permit, and final inspections have not yet occurred. (*See, e.g.*, Letter to CPC, p. 7 [“As the record shows, a chain-link fence has been installed instead.”]; *id.* [“There is graffiti on the chain link fence that has not been removed.”].) All fencing landscaping¹, and setbacks will be inspected **after** the permit is reinstated/issued and construction is complete. It is only at that point that DBS will verify compliance with the approved plans. Appellants allegations are essentially premature code enforcement complaints. It is impossible to find the Project out of compliance before it is even complete.

What is particularly egregious about the appeal are the allegations that the project violates performance standards relating to the front-yard setback and the landscape buffer. The City required Oceans 11 to submit a supplemental application to address these specific issues and subsequently confirmed compliance. Regarding performance standard no. 4, Appellant admits that Oceans 11’s plans show a 20-foot setback, but argues that “it is clear” that Oceans 11 will instead utilize a 17.67 foot front yard prevailing setback. Not only would that not be a violation considering that the City itself calculated 17.67 feet to be the prevailing setback, but Oceans 11 has already represented numerous times that it will provide a 20-foot front-yard setback. Oceans 11 has also recorded a signed covenant agreeing to indefinitely comply with all the performance standards. Appellant’s suspicion that Oceans 11 might use the prevailing setback instead of a 20-foot setback is unfounded and would not constitute a violation in any event.

Regarding performance standard nos. 5 and 6 requiring a landscape buffer and parking area landscaping, Appellant argues that the records shows utility hookups and other structures in those areas, thereby “negating the ability to provide the required landscaping.” First, the City has already determined that the Project complies with LAMC § 12.21.A.6 by dedicating **more than** the required 4% of the total parking area to landscaping.² Ten existing myrtle trees alone account

¹ Plan Sheet P-2 shows a 10-ft landscaped periphery, which complies with performance standard no. 5. Inspection will occur after installation.

² The LOD’s reasoning on this allegation is instructive: “A note on Plan Sheet No. P-1 shows the calculation of the landscaping requirements. The total parking area is 46,135 square feet. Four percent of that is 1,845.5 square feet. One fourth of the required 4 percent, 461.4 square feet, is credited for street trees; according to the plans approved by City Planning, the project will be maintaining the 10 existing crepe myrtle street trees in satisfaction of this requirement. The

for a quarter of the 4% requirement. In other words, Oceans 11 is providing more landscaping than is even required and Appellant has made no showing that any utility hookups threaten compliance.

Second, Appellant provides no evidence that Oceans 11 is constructing something in those areas that conflict with the required landscaping. The presence of rough-ins for shore power units, for example, does not negate compliance with landscaping requirements. To the contrary, landscaping can be and often is installed around such infrastructure. Appellant's argument rests on an unsupported and incorrect assumption that the presence of utilities necessarily precludes landscaping—an assumption that is contradicted by standard development practices and the plain language of the Code.

Finally, Appellant is again arguing prematurely about onsite conditions before project completion, final inspections, and permits.

B. Oceans 11's Project Complies With Performance Standard No. 9

See our office's June 13, 2025, letter addressing Appellant's allegation. We also note that Appellant's argument that Title 25 parking requirements apply only to mobilehome parks and not RV parks is directly contradicted by HCD's 2008 Bulletin stating that "the same issues and rules apply to recreational vehicle parks" unless otherwise noted. The bulletin then specifies that local government authority over RV parks includes the "adopt[ion of] ordinances, rules, regulations or resolutions prescribing park perimeter walls or enclosures on public street frontage, signs, access, and **vehicle parking**[.]" (emphasis added).

Accordingly, we end up back at LAMC Section 12.21.A for the regulation of offsite parking, which Appellant agrees does not contain "explicit parking ratios for RV parks." (Letter to CPC dated June 16, 2025.) Appellant does not identify a parking ratio it believes should apply, but simply states that it is error for the City to exempt Oceans 11 from providing offsite parking. That is not, however, what the record shows. The LOD states that Plan Sheet No. 1 shows that "Each rental site has room for parking 1 RV and 1 vehicle." This would indicate that the project includes 46 off-street parking spaces for its 46 recreational vehicle spots. Two ADA (Americans with Disabilities Act) parking stalls are shown at the center rear of the property on Plan Sheet Nos. P-1 and P-3." Thus, **Oceans 11 is providing ample offsite parking**, thereby satisfying performance standard no. 9.

Because the Project meets all the performance standards thereby entitling Oceans 11 to ministerial permits, there is no basis for Appellant to insist that Oceans 11 instead obtain a CUP.

project includes 4,000 square feet of landscaped area in the front, **which exceeds the required 4 percent of landscaped area required**. Other trees are also included and listed as a note on Plan Sheet No. P-1 and in a plant schedule on Plan Sheet No. P-3. Therefore, the plan shows compliance with the required performance standard." (LOD, p. 50 [emphasis added].)

President Lawshe
Members of the City Planning Commission
June 23, 2025
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V. Conclusion

Appellant's June 16, 2025, "Letter to CPC" offers no new evidence or legal basis to overturn the LOD. The record shows that: (1) no CUP is required for the Project; (2) eligibility as a Public Benefit Project is not based on profit motives; (3) allegations regarding current onsite conditions are premature and unfounded given that the Project is not yet complete, final inspections have not yet occurred, and the applicant is still waiting for the City to reactivate its original permit and/or issue its supplemental permit that is supposedly forthcoming; and (4) the evidence unquestionably shows the Project's compliance with the twelve performance standards.

For the foregoing reasons and those articulated in our office's June 13, 2025, letter, we urge the Commission to deny the appeal and affirm the Director of Planning's LOD in full.

Sincerely,



BENJAMIN M. REZNIK of
Jeffer Mangels Butler & Mitchell LLP

cc: Kristina Kropp, Luna & Glushon (Appellant Representative)

EXHIBIT C

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Ref: 85397-0001

July 29, 2025

VIA E-MAIL AND ONLINE PORTAL

President Marqueece Harris-Dawson and
Hon. Members of the City Council
City of Los Angeles - 200 N. Spring Street
City Hall - Room 340
Los Angeles, California 90012

Re: **Objection to 245 Motion for RV Park at 23416/23514 S. President Ave**
Council File No. 24-0711-S1; Hearing Date: 7/30/2025; Agenda Item 41

Dear President Harris-Dawson and Hon. Members of the Los Angeles City Council:

Our office represents the applicant and property owner for the proposed Silver RV Park located at 23416 and 23514 South President Avenue. We write to formally object to the City Council's consideration of the June 27, 2025 motion seeking to assert jurisdiction pursuant to Section 245 of the City Charter over the City Planning Commission's June 26, 2025, denial of an administrative appeal (CPC Case No. DIR-2024-7352-BSA-1A) of our client's building permits. The motion is legally and procedurally improper for multiple reasons, each of which independently warrants denial of the 245 motion. Moreover, it should be noted that the City Planning Commission, the Director of Planning, and Department of Building & Safety all performed a thorough review of this appeal before acting to deny it, and there is simply no legal or appropriate basis for the City Council to disturb these well-reasoned decisions.

A. Charter Section 245 Does Not Apply Where the Matter Is Already Subject to City Council Review.

Charter Section 245 expressly prohibits the City Council from asserting jurisdiction over "actions which are subject to appeal or review by the Council pursuant to other provisions of the Charter, ordinance or other applicable law." (See Charter Sec. 245(d)(8).) The Silver RV Park project has already been the subject of a prior motion and City Council action (see Council File No. 24-0711), which include direct legislative inquiries and instructions to City departments to halt approvals and conduct additional environmental review and compliance analysis. In fact, this 245 motion was given the same council file number as the prior matter which remains pending, making it clear as day that this is a matter currently subject to City Council review. This concurrent

Council engagement—centered on the very same permit and project site—means the matter is already “subject to review by the Council” and therefore cannot be called up under Charter Section 245. To do so would contravene both the plain language and legislative purpose of Section 245.

B. Asserting Jurisdiction Would Clearly Violate Due Process.

The City Planning Commission action that is subject to this motion is quasi-judicial in nature, and involves an administrative appeal of a ministerial building permit. In this context, the parties are entitled to due process protections, including the right to neutral and unbiased decisionmaker. (See *Petrovich Dev. Co., LLC v. City of Sacramento* (2020) 48 Cal. App. 5th 963, 973, “[W]hen functioning in such an adjudicatory capacity, the city council must be neutral and unbiased.”) Yet the proponent of the June 27 motion—Councilmember McOsker—has already participated in Council actions that clearly disparage the project and its operator, referring to the proposed project as associated with “nuisance activity” and “clear and present” public safety risks (see June 14, 2024 Motion, Council File 24-0711). Having prejudged the matter, Councilmember McOsker and other participating Councilmembers are disqualified from serving in any adjudicative capacity. Per Charter Section 222, where disqualification arises, the matter must be transferred to the Board of Referred Powers. Accordingly, even if the Council could otherwise lawfully assert jurisdiction under Section 245 (which it cannot), the matter would require transfer to the Board of Referred Powers due to established conflict and bias.

C. Further Consideration Would Violate the HAA's Hearing Limits.

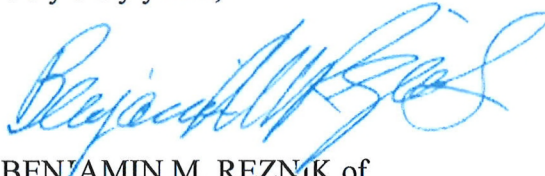
Finally, proceeding with further discretionary hearings on this matter would constitute yet another violation of the Housing Accountability Act (HAA) (Gov. Code § 65589.5), which limits local governments to no more than five public hearings on a qualifying housing project. The City has already held multiple hearings on this ministerial RV park project, including Council and Committee discussions triggered by Council File No. 24-0711. The June 27 motion seeks to send the matter to committee for yet another public hearing, clearly pushing the total count beyond the HAA’s five-hearing cap. This violates state law and exposes the City to potential liability, including under the HAA’s attorney’s fees and penalty provisions.

Conclusion

For the foregoing reasons, the City Council must decline to assert jurisdiction under Charter Section 245. The action is legally unauthorized, procedurally improper, and substantively barred under both the Los Angeles Charter and the Housing Accountability Act.

President Marqueece Harris-Dawson
Hon. Members of the City Council
July 29, 2025
Page 3

Very truly yours,



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DF:bmr

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