

STOP THE ILLEGAL OCEAN'S 11 RV PARK
23416 & 23514 S. President Ave., Harbor City

SAME DEVELOPER – SAME VIOLATIONS – SAME LADBS NON-ENFORCEMENT

Wilmington – Already operating with violations
Mission Hills & Harbor City – No Certificate of Occupancy

ALL THREE SILVER RV PARKS VIOLATE MANDATORY PERFORMANCE STANDARDS

PS #5 – ALL THREE SITES DESTROY THE 10-ft BUFFER & 15-ft SETBACK

The buffer must remain completely clear of structures, utilities, and equipment.

All three properties built utility islands & electrical systems inside the buffer.

Harbor City & Wilmington built unpermitted buildings directly inside the buffer and also stored rolling dumpsters there – no trash enclosure provided.

Trash bins violate LAMC §12.22 A.8 – they must be in gated, covered, solid enclosures, and all three sites have none.

PS #4 – Front Setback Manipulated (Harbor City)

Required 20.5 ft → Built 17.3 ft.

Developer submitted false data (admitted Nov 17).

PS #3 – Perimeter Fence Not Legal

Must be 8-ft and made only of masonry or wrought iron.

Chain-link and 7-ft fencing are not allowed.

All three sites fail this, and Harbor City's gate uses unapproved materials.

PS #8 – ADA Parking Not Provided

Harbor City & Mission Hills: No ADA stall built.

Wilmington: Stall exists but not usable/blocked.

Original Conflicting Plans = Invalid Permit

Approved plan set shows 39 (page 1), 46 (page 3), and 55 spaces (page 4) – ministerial approval is illegal without one consistent plan.

LADBS CLOSED EVERY COMPLAINT WITHOUT INSPECTION.

The violations are already built – they cannot be “fixed on paper.”

CITY COUNCIL MUST TAKE ACTION ON DECEMBER 2

- ✓ Uphold McOskey's §245 assertion of jurisdiction
- ✓ Remand for a full Conditional Use Permit (CUP) with CEQA review
- ✓ Order independent on-site inspections at all three Silver properties
- ✓ **No Certificate of Occupancy** until every violation is corrected
- ✓ Direct LADBS to explain why it failed to enforce at Wilmington, Mission Hills, and Harbor City

Green Meadows West Residents – Harbor City
10 pages of photographic proof and City records follow

Why does LADBS Refuse to enforce CPC zoning ordinances for this developer

Same Developer. Same Violations. Same LADBS Non-Enforcement

- PS #5 — A 10-ft landscaped buffer and a 15-ft setback must remain completely clear of all structures, utilities, RVs, dumpsters or equipment.
- Utility islands, an 800-amp electrical system, and unpermitted buildings were all constructed inside the required 10-ft landscaped buffer and within the 15-ft rear setback, violating both setback and buffer requirements.

23416 President Harbor City



Utility islands and the 800-amp electrical distribution system have been constructed inside the required 15-foot setback and 10-foot landscaped buffer, a clear violation of Performance Standard #5



1551 Young St Wilmington



9849 Lemona Ave, North Hills



Why does LADBS Refuse to enforce CPC zoning ordinances for this developer?

Same Developer. Same Violations. Same LADBS Non-Enforcement

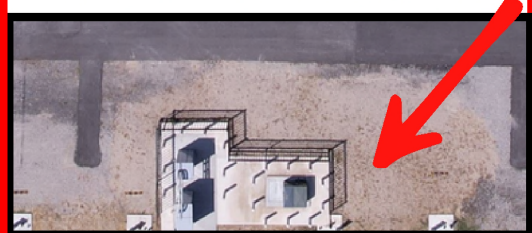
- PS #3 — Required 8-ft Wrought-Iron or Masonry Fencing
- PS #4 — Harbor City: Front Setback Not Met (19.3 ft → 17.3 ft, Required 20.5 ft)
 - Wilmington: RVs resides Directly Inside the 20-ft setback
- PS #8 — ADA parking was eliminated at Harbor City & Mission Hills, and the stall at Wilmington is painted but not compliant (improper dimensions, blocked access, no accessible route).

23416 President Harbor City



The front setback required to be 20.5 feet is not met— Gate 1 measures 19.3 feet and the fence slopes down to 17.3 feet at Gate 2, placing both segments in clear violation of Performance Standard #4.

No ADA Parking Replaced by 800A Electric System



The perimeter fence must be a minimum of 8 feet of wrought iron or masonry under Performance Standard #3, yet the front fence measures only 7 feet and the rear fence remains chain-link—both clear violations of the mandatory standard.



1551 Young St Wilmington



Non Compliant ADA Parking



9849 Lemona Ave, North Hills

Status	Work Description
Quality Review Completed 10/17/2025	Had to add ADA Parking SUPPLEMENTAL TO PERMIT 24020-10000-01020 TO REMOVE TRASH ENCLOSURE AND REVISE THE WORK DESCRIPTION TO "USE OF LAND PERMIT FOR RV PARK WITH ADA PARKING UNDER PUBLIC BENEFIT PROGRAM PER LAMC 14.00.A.7. AND SPECIAL OCCUPANCY PARK ACT. CEQA EXEMP " AND TO REVISE TRASH ENCLOSURE.



Construction Violation: Developer Labeled Permanent Buildings as “Tuff Sheds for storage”

All three sites show a pattern: permanent restroom and laundry buildings were constructed, yet the developer misrepresented them as no-permit “Tuff Sheds” to evade required approvals.

Silver RV Park

Harbor City

Unmatched Convenience and Comfort

At Silver RV Park, we redefine the RV living experience. Enjoy the convenience of full hook-ups, free utilities, and spacious sites for a seamless stay. Our commitment to excellence extends to on-site amenities, including laundry facilities, electric security gates, and community restrooms. Experience a harmonious blend of comfort and security, creating an environment where you can truly feel at home.



Oceans 12 RV Park

[Home](#) [Galler](#)

Wilmington

Bring your RV here and live in it at a brand new RV park. Come stay with us. We will rent you an RV space. We are 1/2 mile from the water and right next to Long Beach and a beautiful park. With laundry, electric in and out security gate, community restrooms and a live-in on-site manager all for \$1250/month!



9849 Lemona Ave. North Hills, CA 91343

Silverland RV Park

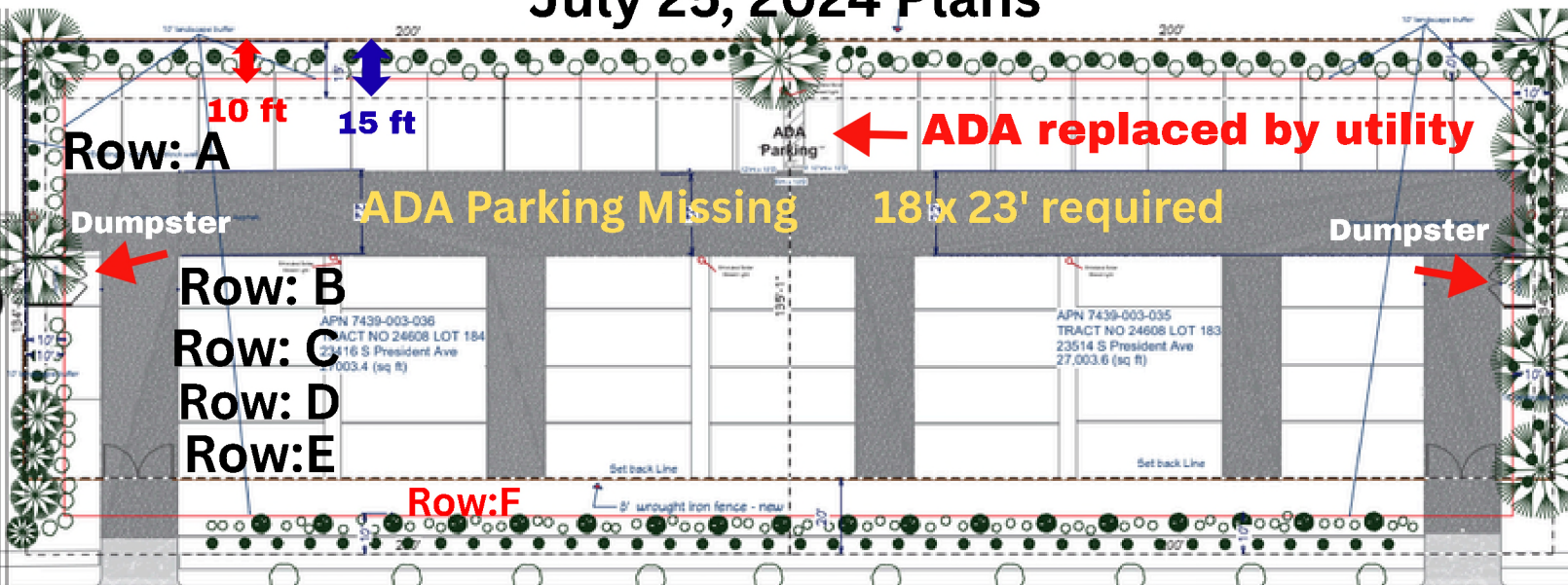


Public Showers + Restrooms

Rinse off, feel refreshed, and relax.



July 25, 2024 Plans



Aerial Drone Image, June 2025

Utility Island Structures

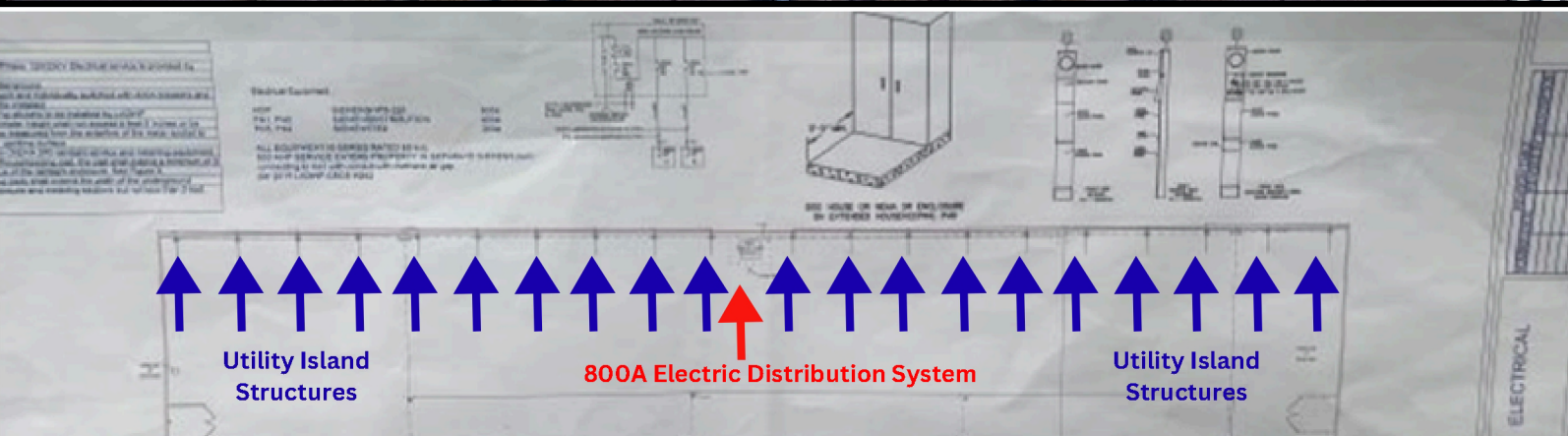
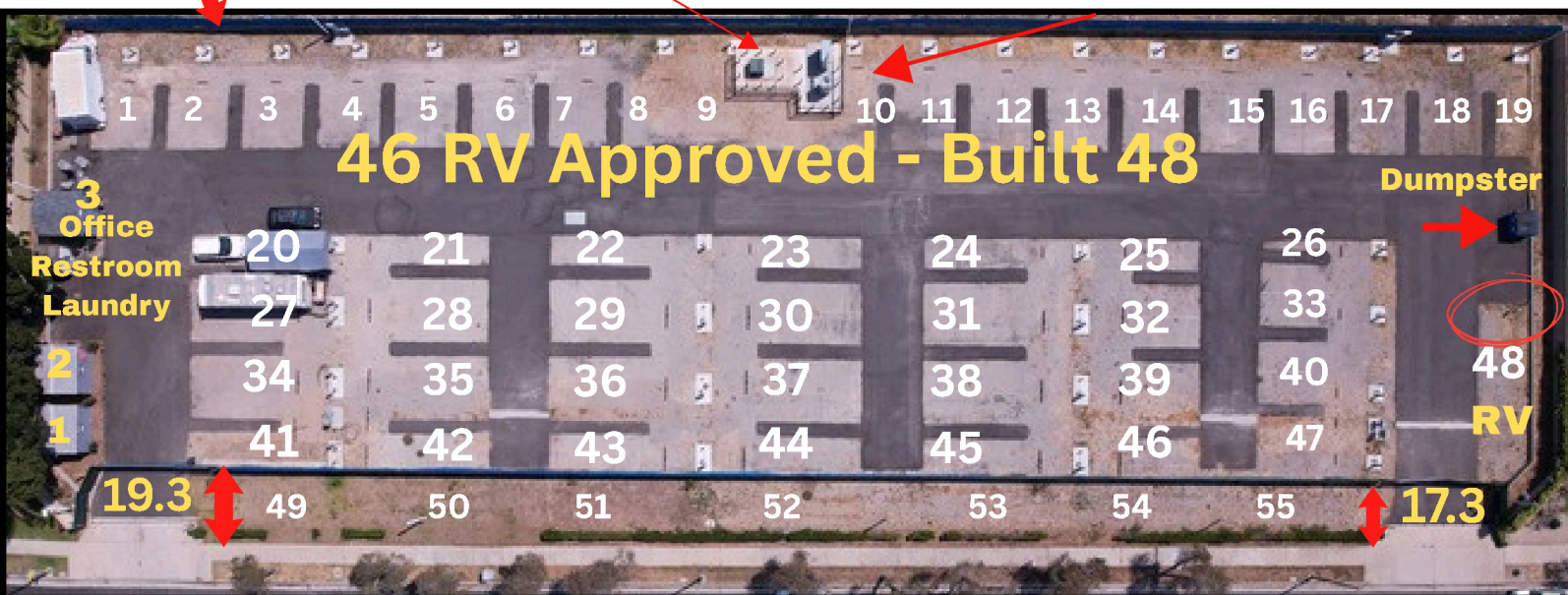
800 A Electric System

ADA replaced by utility

46 RV Approved - Built 48

Dumpster

RV



This image from Sheet P-4 shows utility pedestals (small boxes) lined along the rear fence, providing hookups to each RV. These are built within the 15-foot setback and 10-foot buffer required by **Performance Standard #2 & 5**. The larger box marked "800A" is the Electric Distribution System, which also encroaches into the buffer and occupies the ADA parking space shown on Sheet P-1. This layout replaces required landscaping and ADA access with infrastructure, a clear zoning violation

Setback Manipulation & Data Errors – LADBS Oversight Failure

/ LAMC §14.00 A.7

Performance Standard #4 Violation

Harbor City - The developer manipulated the prevailing setback calculator by entering three unrelated parcels (totaling 26,442 sq. ft.) to force the setback down to 17.69 ft. But the actual site consists of only two parcels – APNs 7438-003-035 and 7438-003-036, totaling 53,990 sq. ft. (R1 zone) – which require a 20.5-foot front setback under Performance Standard #4. Even the City’s own report shows an 18.20-ft setback, which still fails to meet the legal minimum. This was a deliberate attempt to shrink the front yard and squeeze in more RV spaces – not a public benefit.

Miss Information

Calculator for the prevailing setback:
Plans 7/25/24

Prevailing Setback calculations

Number of lots: **3** **Its only 2 parcels**

Prevailing Setback: 17.67 ft **20 ft manatory**

Calculation **Used on the design plans**

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**

Lots Used **Wrong data**

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

Verified Lot Information

23414 & 23416 President Lot for sale on President Ave in Harbor City. This listing includes **(2) parcels**: 7438-003-035, 7438-003-036. The total square footage is **53,990 SF** zoned LAR1 (1.24 acres). Prevailing setback and development standards must be based on these APNs: 7438-003-035 & 7438-003-036

Performance Standard

(4) The front yard setback is at least as deep as the setback required by the zone;

What the City Said (Documented in Records)

Developer – 17.69 ft (out of compliance)
Came from false data entered into the calculator.
CPC – 18.20 ft (out of compliance)
CPC relied on the developer’s incorrect inputs.
LADBS – 20.5 ft (correct, but still unenforced)

At PLUM, LADBS stated the R1 zone requires a full 20.5-ft setback – the actual legal standard

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5. Ruben Vasquez and I, for the City, and Doug Ross, Donyea Adams, and Stewart Silver, for the Applicant, attended the June 28, 2024 meeting. We discussed the Performance Standards. In particular, the project still did not fully comply with condition #3. The original plans showed a wall within the required twenty-foot setback. We advised them that the wall can be 8 feet tall as long as it is setback 20 feet from the front property line; any portion of the wall within the setback had to be removed. The Applicant team seemed cooperative and said they wanted to ensure that they complied with all the conditions and were willing to submit updated plans to be clear they did comply or to

6

55 Utility Island Units Built – Only 39 and 46 Approved

Violation of LAMC §14.00 A.7(9): Hidden Density, Manipulated Plans. **Performance Standard #12**

Harbor City - The developer submitted conflicting plans, one showing 46 RVs, another reduced to 39 just to secure approval. But aerial and on-site documentation reveals that 54-55 utility island hookups were installed, allowing for far more RVs than the public or LADBS were ever told. Hookups even extend into the 20-foot front buffer zone, a clear zoning violation. The January 2024 electrical plans themselves show 49 utility pedestals, contradicting both site and approval counts. ABC7 aerial footage confirms this hidden expansion. This directly violates LAMC §14.00 A.7(9), which requires all Public Benefit projects to fully match their approved plans. This is not an oversight, it is deliberate misrepresentation to increase density without public review or permit approval.

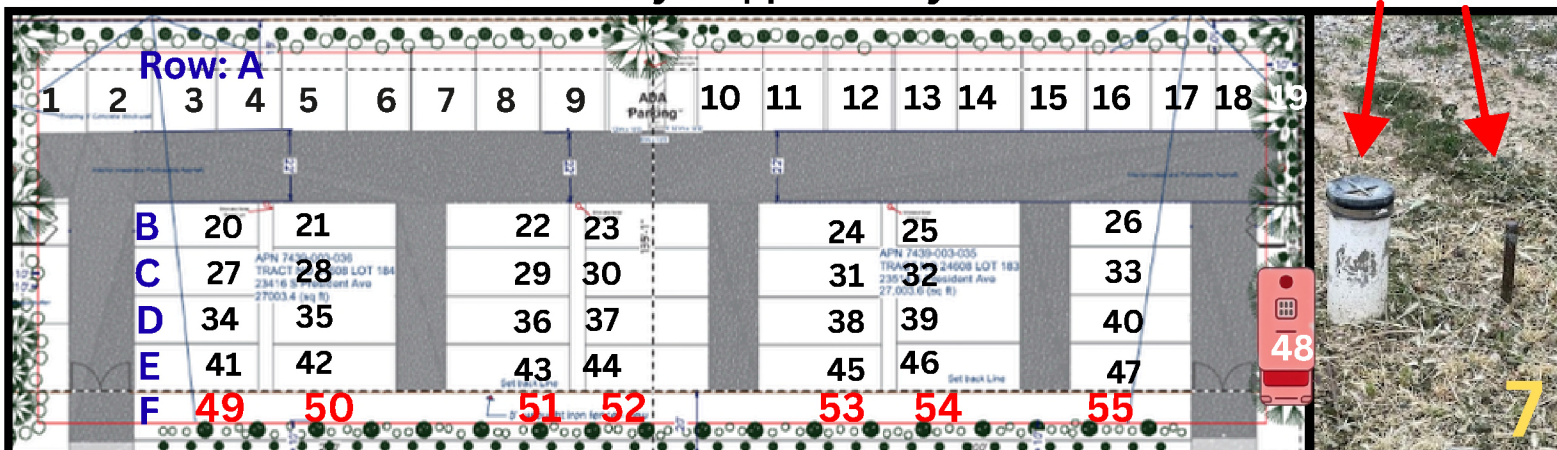


By [Shayla Girardin](#) abc7
Thursday, June 27, 2024



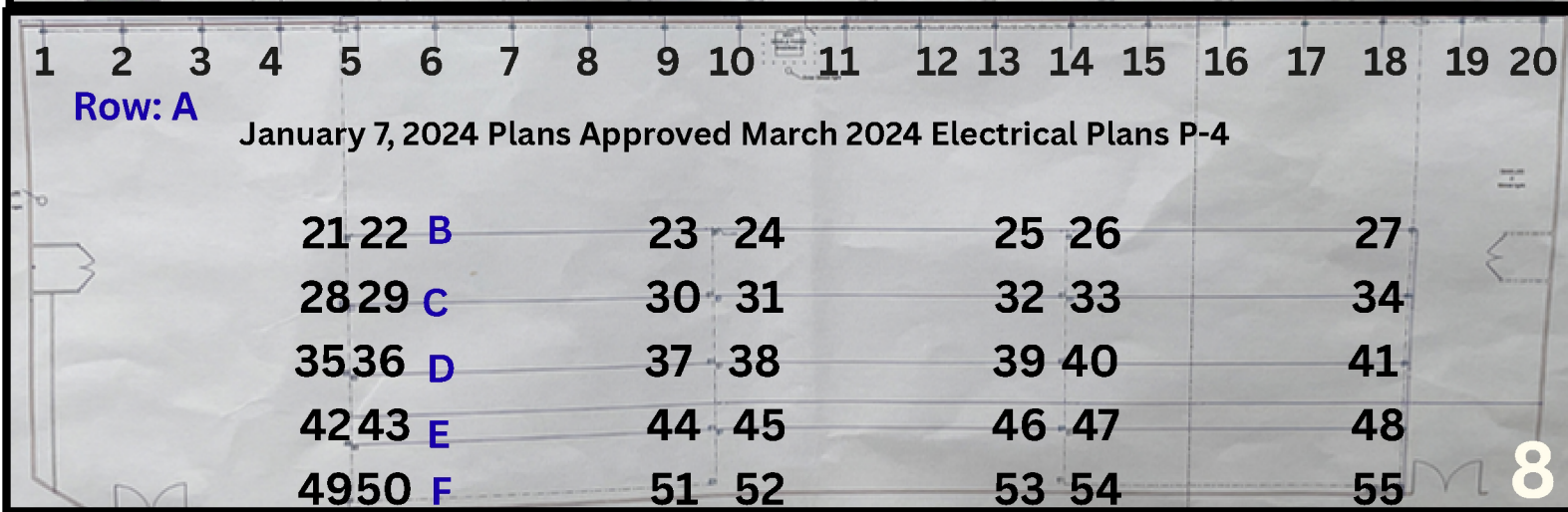
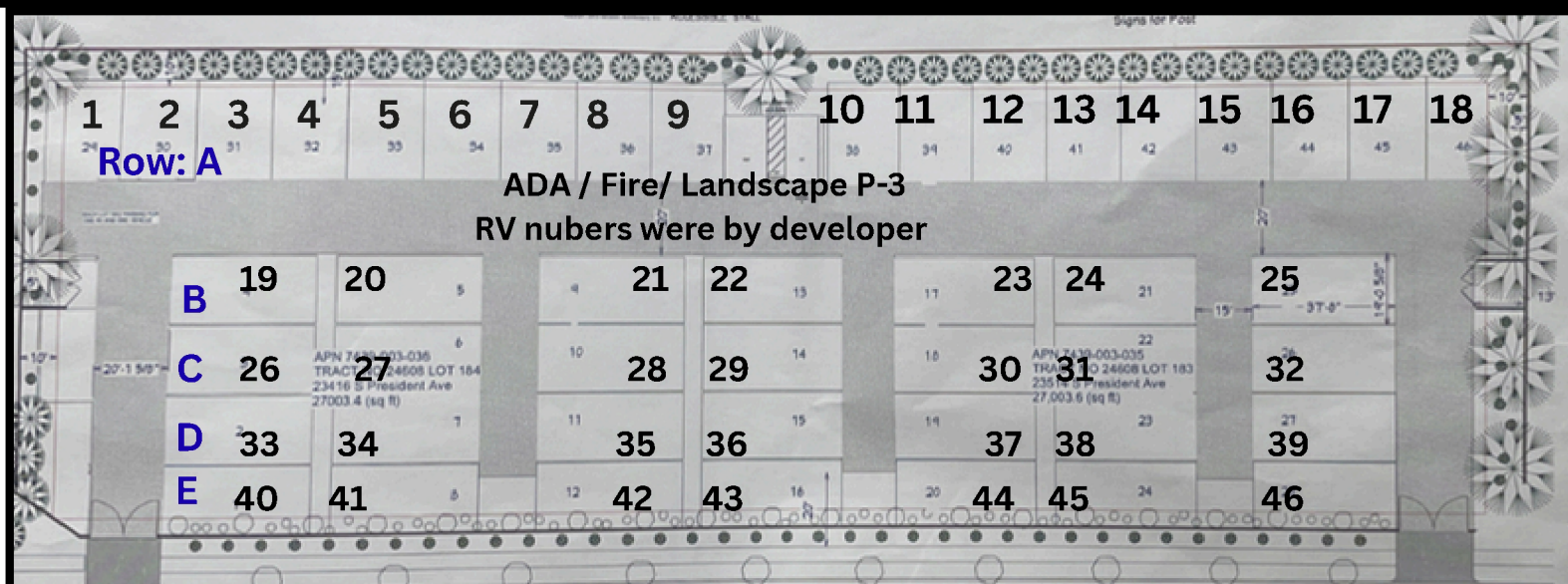
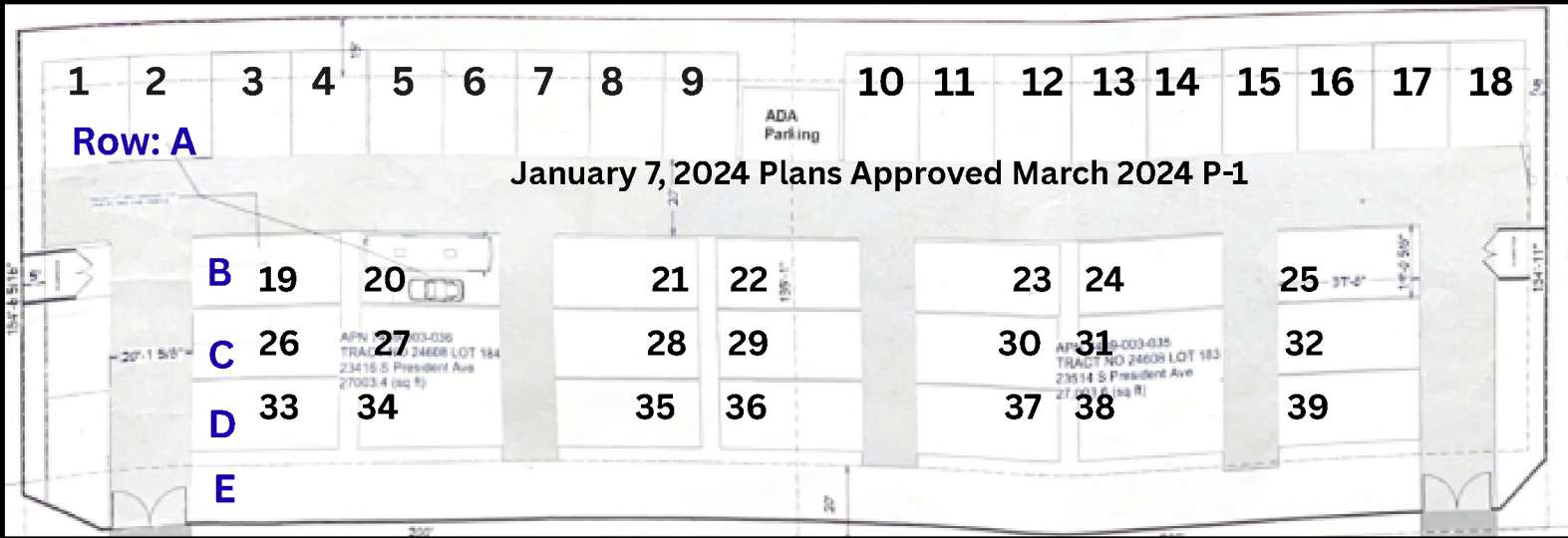
Plans: 7/25/24: Built with the intention of installing 55 RVs Not 46 RVs / No RV stall Measurements yet approved by LADBS

Utility Island units in front of the property in the 20.5 ft buffer



LADBS Approved an Original Plan Set with Conflicting RV Counts – 39, 46, and 55 – Invalidating Ministerial Review from the Start.

State law and LAMC §14.00 A.7 require ministerial approval to be based on one single, consistent set of plans. But the original plan set was internally contradictory: P-1’s diagram shows 39 RVs while its written text claims 46, P-3 depicts 46 RVs, and P-4’s electrical plan supports more spaces than the 39 shown on P-1. These conflicting sheets mean LADBS never evaluated a single accurate project, and the City cannot verify setbacks, buffers, utilities, ADA, or any Performance Standard using contradictory documents. A ministerial permit cannot be issued when the plan set contradicts itself – it was invalid from the beginning. Ministerial review legally impossible with conflicting plans



LADBS Ignored Repeated Violations – 23416 President Avenue

Community Complaints Dismissed. Violations Unchecked.

LAMC §§91.103.1 & 91.106.4.1 Not Enforced

Harbor City - LADBS Failed to Enforce the Law: Despite receiving multiple complaints from residents with photos, dates, and documentation LADBS closed the cases without issuing corrections or conducting proper site inspections. This inaction violates LADBS's duties under LAMC §§91.103.1, 91.106.4.1, and 12.21 A.1(a), which require them to enforce zoning and ensure compliance with approved plans. Instead, the developer was allowed to proceed unchecked, erecting unpermitted structures, erasing buffer zones, and removing landscaping with no accountability. R1 neighborhoods deserve meaningful enforcement not silence. Now the burden falls to the CPC. If LADBS won't act, you must.

Date Received	Problem Description	Status
1/6/2024	BUILDING OR PROPERTY CONVERTED TO ANOTHER USE	CLOSED
5/27/2024	BUILDING OR PROPERTY CONVERTED TO ANOTHER USE	CLOSED
6/21/2024	BUILDING OR PROPERTY CONVERTED TO ANOTHER USE	CLOSED
6/21/2024	MISCELLANEOUS COMPLAINTS	CLOSED
6/26/2024	COMMERCIAL ADVERTISING ON A TEMPORARY CONSTRUCTION FENCE	CLOSED
7/2/2024	MISCELLANEOUS COMPLAINTS	CLOSED
7/21/2024	CONSTRUCTION IN PROGRESS WITHOUT PERMITS OR INSPECTIONS	CLOSED
7/31/2024	MISCELLANEOUS COMPLAINTS	CLOSED
8/1/2024	MISCELLANEOUS COMPLAINTS	CLOSED
8/14/2024	OPEN STORAGE OF VEHICLES THAT CANNOT BE LEGALLY OPERATED (E.G. JUNK CARS)	CLOSED
8/15/2024	MISCELLANEOUS COMPLAINTS	CLOSED
8/22/2024	CONSTRUCTION DONE WITHOUT PERMITS OR INSPECTIONS	CLOSED
8/23/2024	MISCELLANEOUS COMPLAINTS	CLOSED
9/3/2024	CONSTRUCTION IN PROGRESS WITHOUT PERMITS OR INSPECTIONS	CLOSED
9/5/2024	ANY PROBLEMS THAT ONLY OCCUR FROM 5:00PM TO 7:00 AM (AT NIGHT) OR ON WEEKENDS	CLOSED
9/26/2024	BUILDING OR PROPERTY CONVERTED TO ANOTHER USE	CLOSED
2/20/2025	MISCELLANEOUS COMPLAINTS	CLOSED
2/20/2025	MISCELLANEOUS COMPLAINTS	CLOSED
2/20/2025	MISCELLANEOUS COMPLAINTS	CLOSED
2/20/2025	MISCELLANEOUS COMPLAINTS	CLOSED
2/20/2025	MISCELLANEOUS COMPLAINTS	CLOSED
2/20/2025	DISABLED ACCESS ISSUES	CLOSED
2/22/2025	MISCELLANEOUS COMPLAINTS	CLOSED
5/7/2025	CONSTRUCTION DONE WITHOUT PERMITS OR INSPECTIONS	CLOSED
6/14/2025	CONSTRUCTION DONE WITHOUT PERMITS OR INSPECTIONS	CLOSED
6/29/2025	CONSTRUCTION DONE WITHOUT PERMITS OR INSPECTIONS	CLOSED
6/29/2025	CONSTRUCTION DONE WITHOUT PERMITS OR INSPECTIONS	CLOSED
6/30/2025	CONSTRUCTION DONE WITHOUT PERMITS OR INSPECTIONS	CLOSED
7/15/2025	MISCELLANEOUS COMPLAINTS	CLOSED
7/15/2025	MISCELLANEOUS COMPLAINTS	CLOSED
7/21/2025	MISCELLANEOUS COMPLAINTS	CLOSED
7/26/2025	MISCELLANEOUS COMPLAINTS	CLOSED
8/2/2025	MISCELLANEOUS COMPLAINTS	CLOSED
8/23/2025	MISCELLANEOUS COMPLAINTS	CLOSED

23416 S PRESIDENT AVE

Date Received: 8/22/2024
Description: CONSTRUCTION DONE WITHOUT PERMITS (C
Inspector: BRIAN CHRISTIAN
Phone: (310)732-4530
Status: DUPLICATE SERVICE REQUEST

23416 S PRESIDENT AVE

Date Received: 2/20/2025
Description: DISABLED ACCESS ISSUES
Inspector: KELLY WARNER
Phone: (310)732-4531
Status: DUPLICATE SERVICE REQUEST

 Feb 20–22, 2025 – Multiple Complaints Filed

 Documented violations of individual performance standards.

? Did LADBS even inspect the site? Were any correction notices issued?

! To this day, the RV park remains noncompliant and LADBS has taken no visible action

**In total 43
Complaints**

Parking Requirement Removed – LAMC §14.00 A.7(e)

Performance Standard 9 Violation

No Legal Parking. No Title 25 Exemption. No Public Benefit.

Harbor City - The RV park is in direct violation of Performance Standard #9 under LAMC §14.00 A.7, which requires adequate on-site parking for all vehicles. While the developer claims to meet this requirement, the reality is far different. Parking is offered at an additional cost of \$600 per month, and most stalls are too small to accommodate both an RV and its associated passenger vehicle. As a result, RVs are crammed side-by-side, leaving no room for vehicle parking. Residents are left with no choice but to park in fire lanes or along the surrounding streets, creating safety hazards and neighborhood congestion. These are DMV-registered RVs, not HCD-certified mobile homes, Title 25 does not apply. The project is still subject to local zoning laws, and LAMC §12.21 A clearly mandates on-site parking. This is not a legal exemption, it is a blatant zoning violation.

**Silver RV Park Site**

RV Rental Package incl. RV and Space
\$1,900.00

Monthly RV Rent
\$1,300.00

[Add to cart](#)

[Add to cart](#)



Wilmington – Same Developer, Same Strategy: At the Wilmington RV park, the same developer ignored parking requirements, resulting in cars parked illegally across fire lanes and drive aisles. Emergency access is blocked, circulation is chaotic, and there is no formal parking plan. This is a preview of what Harbor City will become if these violations go unchecked. No enforcement then. No accountability now. CPC must act before this becomes permanent.



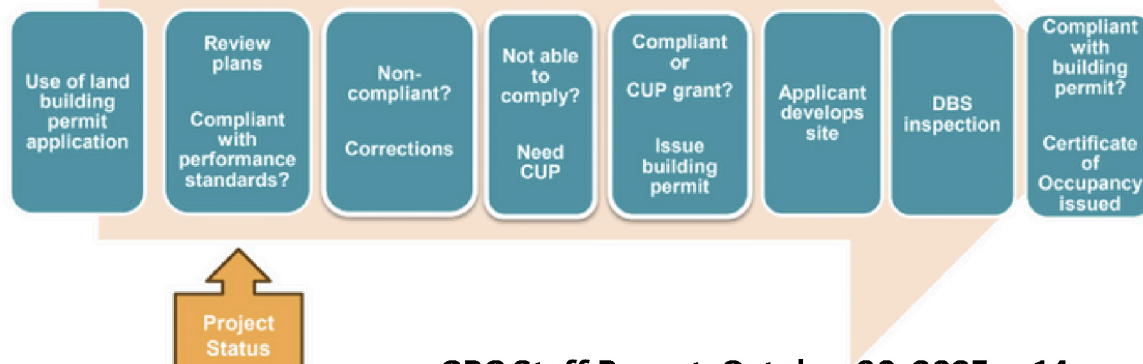
Unsafe

Unsafe

City Records Contradict Themselves: CPC Found the Plans Non-Compliant, Yet LADBS Claims Compliance After the Site Was Already Built: How can the City Council ensure LADBS enforces CPC findings?

Public Benefit Projects – Generalized Permit Process

Presentation: CPC Oct 9, 2025



How are we
in statge 2
when the
site is built?

CPC Staff Report: October 30, 2025 p. 14

“The Zoning Administrator has never seen the electrical plans or Plan Sheet P-4, referenced by the community, and electrical plans are not reviewed or cleared by the DCP. However, electrical plans that conflict with DCP clearances may present a problem later in the process. Ultimately, development of the site would not be allowed to conflict with DCP clearances.”

LADBS Report: October 31, 2025 p. 4

Allegagtion from Green Meadows

“There are approximately 20 shore power units (utility hookup pedestals/islands) anchored to concrete pads, an 800A Electric Distribution System, measuring 36 feet by 24 feet, and methane gas mitigation equipment constructed in the rear portion of the landscape buffer and the 15-foot rear yard setback.”

LADBS Response: p 5

“LAMC 12.22A2, allows the installation of structures for **public utility purposes** to be placed within any required yard setbacks and landscape buffers” **Violates PS #5 & not a public utility its private**

LADBS Report: October 31, 2025 p. 2

“The quantity of RV stalls is not enforceable by LADBS. The approved plans indicate 46 RV parking stalls. Furthermore, the areas delineated for RV spaces are for diagrammatic purposes only and should not be interpreted as actual spaces. Use of land permits are only required to show areas in which the intended use will be proposed. Those areas shown will be made to be compliant with the performance standards as set forth on LAMC 14.07.” **Who enforces?**

LADBS Report: October 31, 2025 p. 7

“However, LAMC 12.21 A.4 does not provide specific guidance on the off-street parking requirement ratios for recreational vehicle parks or mobile home parks. Furthermore, LAMC 12.21 A.5 pertains to parking facility design and the proposed development is an RV park not a parking facility. The only stalls subject to the LAMC 12.21 A.5 are the stalls provided for disabled access” **LADBS cannot have it both ways: they admit there are no parking ratios or standards for RV parks, yet still claim the project “meets” PS9. If there is no metric, there can be no compliance — and PS9 cannot be satisfied, which invalidates this project for ministerial approval.**