

From: pefyam@sbcglobal.net

Name: Elsie_Y

Date Submitted: 07/23/2025

Council File Number: (e.g. XX-XXXX-SXXX)

Comment:

I support Councilmember Tim McOsker's Motion 57 (24-0711-S1) and request the City to conduct a thorough review, investigation, and inspection of the 23416 S. President Avenue RV Park (the Silver RV Park) Project. Please see attachment titled "Elsie_Y Public Comment 07-23-25" for my full comment. Thank you.

Public Comment submitted by Elsie_Y (07-23-25)

As a Harbor City property owner, I **support Councilmember Tim McOsker's Motion 57 (24-0711-S1) and request the City to conduct a thorough review and investigation of the 23416 S. President Avenue RV Park (the Silver RV Park) Project.** I want to bring to the City's attention that there are many inconsistencies between the approved Plans for the Park and the actual constructions at the site. On the approved Plan, it shows a total of 46 RV parking stalls. 18 stalls in vertical position across the back fence of the property. Seven columns of 4 (a total of 28) stalls in horizontal position parallel to the front iron-fence. These horizontal stalls are lined up in 7 columns across and 4 rows deep, creating 28 RV stalls. Together, the vertical and horizontal stalls add up the 46. However, from the aerial view provided by abc7.com in June 2024 as well as local resident eye witnesses, there are eight more utility hookups built than the 46 RV stalls approved. This clearly shows intention of violation. There are other violations in plain sight as well. See few of them below:

- 1.) The horizontal rows of utility hookups are five deep instead of four, creating seven more parking stalls.
- 2.) There is another utility hookup (labeled #25) on the north side of the property on the required 10-foot landscape buffer zone next to the 3 pre-fabricated structures.
- 3.) There are also 7 additional utility hookups in front of the property outside of the iron-fence, next to the sidewalk. The purpose of their use is very clear. This brings to a total of 54 utility hookups, eight more than the approved 46 RV stalls.
- 4.) The two ADA parking spots on the approved Plan are now replaced with permanent utility infrastructure.
- 5.) There are three prefabricated structures located inside the entrance of the gate on the north side 10-ft landscape buffer zone that are not on the approved Plan.
- 6.) An RV and a vehicle are parked inside the property with occupant(s) and a dog. They are seen outside of the property from time to time. The permit for occupancy is not yet issued.

Mr. Silver, the owner and developer of Silver RV Park, is known for his deception, manipulation, misconduct, and neglect of his for-profit RV parks. There are local news footages and articles written about him and his RV parks. It is a pattern and the Green Meadows West community will pay the price for his doing if this project is not stopped.

The City must step in and stop this kind of abuse. I support 100 percent Councilmember McOsker's motion to assert jurisdiction and for oversight of the Silver RV Park project.

From: mscooper8@aol.com

Name: Christal Cooper

Date Submitted: 07/23/2025

Council File Number: (e.g. XX-XXXX-SXXX)

Comment:

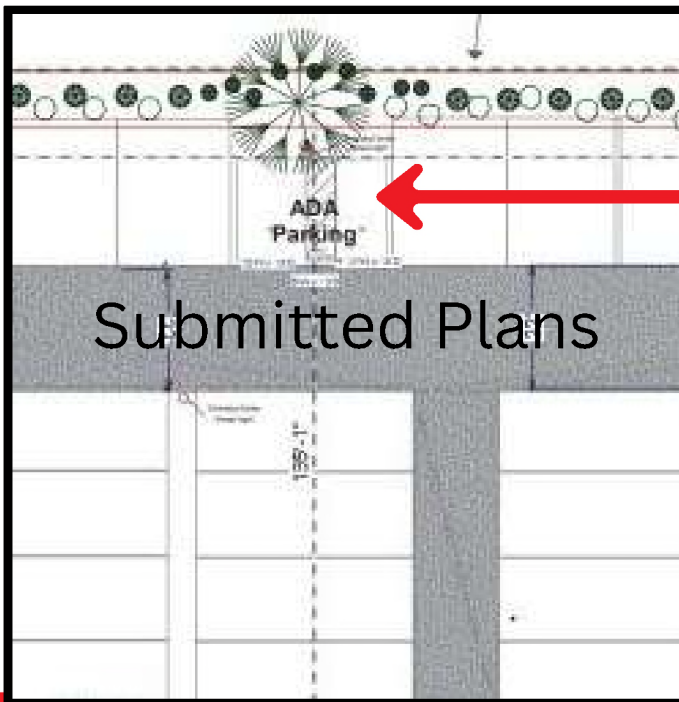
The attached flyer documents a serious violation of Performance Standard #8 under LAMC §14.00 A.7, which requires ADA-compliant parking and access as a condition for Public Benefit eligibility. While Sheet P-1 of the developer's submitted plans showed two ADA-compliant parking spaces to suggest zoning compliance, the site was actually constructed according to Sheet P-4, which eliminates those spaces entirely and replaces them with permanent utility infrastructure including an 800A methane-rated electrical distribution system. This design not only removes legally required ADA access but also builds that infrastructure directly within the 10-foot buffer zone, violating Performance Standard #2 as well. By constructing the project according to a different sheet than the one used to justify compliance, the developer misrepresented the project's zoning adherence and civil rights obligations. This constitutes not just a zoning violation but a clear act of intentional noncompliance that disqualifies the site from ministerial approval as a Public Benefit Project.

ADA Accessibility Violation

Civil Rights and Zoning Laws Ignored

Approved ADA Parking Removed, Replaced with Utility Infrastructure
Violates Title II of the ADA and LAMC §14.00 A.7 Public Benefit Requirements

Harbor City – ADA Access Removed, Safety Compromised: The approved plans for 23416 S. President Avenue originally included two ADA-compliant parking spaces, as required by federal law, California Building Code, and LAMC §14.00 A.7 Performance Standard #8. These spaces were not merely omitted they were eliminated and replaced with permanent utility infrastructure, including what appears to be an 800A methane-rated electrical distribution panel. What makes this more troubling is that LADBS approved this layout specifically on Sheet P4 of the electrical plan set even though the structure was placed directly where the ADA parking was required. The result is not just a technical oversight it is a civil rights violation that actively excludes disabled individuals from accessing the site, in direct violation of the Americans with Disabilities Act, California Building Code Chapter 11B, and zoning code requirements.



Actual Site: NO ADA Parking

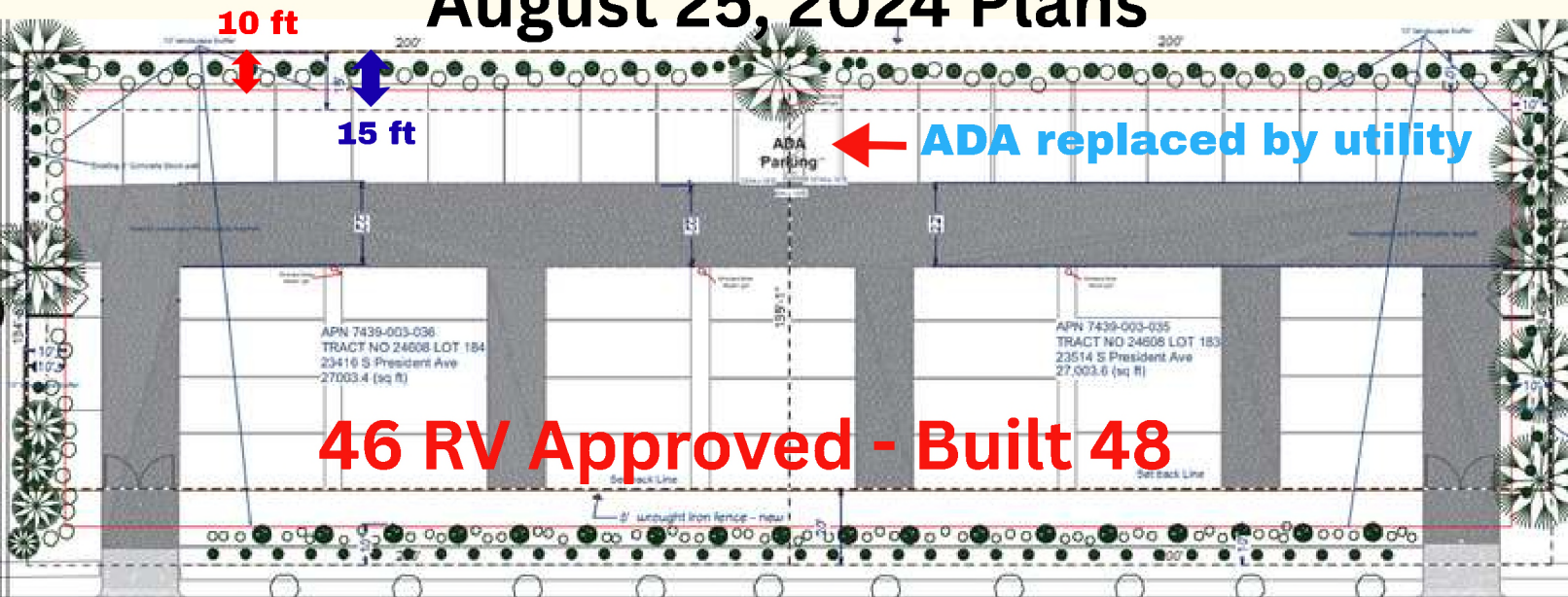


Wilmington: Same Developer. Same ADA Disregard. At the Wilmington RV park, ADA parking is blocked by RVs and personal vehicles making access unreliable or impossible. This is not accidental. It reflects a broader pattern of noncompliance and neglect. Removing accessible parking violates both the spirit and letter of Public Benefit zoning.

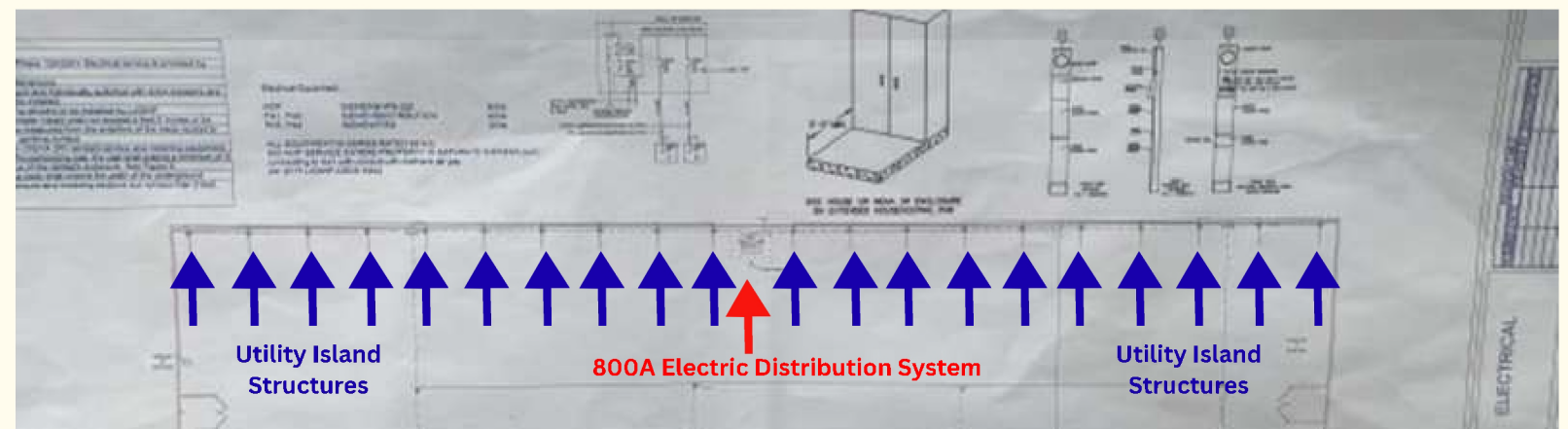


Accessibility Ignored

August 25, 2024 Plans



Aerial Drone Image, June 2025



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. 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

From : mscooper8@aol.com

Name: Christal Cooper

Date Submitted: 07/23/2025

Council File Number: (e.g. XX-XXXX-SXXX)

Comment:

The attached flyers document clear violations of at least five required Performance Standards under LAMC §14.00 A.7 for Public Benefit Projects. Performance Standard #1 was violated by constructing multiple 15-foot-wide drive aisles where 24 feet is required for two-way emergency access, creating unsafe dead-end lanes. Standard #2 was violated by placing utility infrastructure and RVs within the 10-foot landscaped buffer zone. Standard #8 was violated when ADA-compliant parking was removed and replaced with an 800A methane-rated electrical distribution system, eliminating required accessibility. Standard #9 was violated by building 54 utility hookups despite approval for only 39-46 RVs, resulting in an unapproved expansion. Finally, Standard #12 was violated through the construction of unpermitted structures, conflicting plans, and deliberate misrepresentation of the site layout, all of which invalidate the project's eligibility for ministerial approval as a Public Benefit.

Drive Aisle Violation – Fire Access and Zoning Standards Ignored: Performance Standard #1

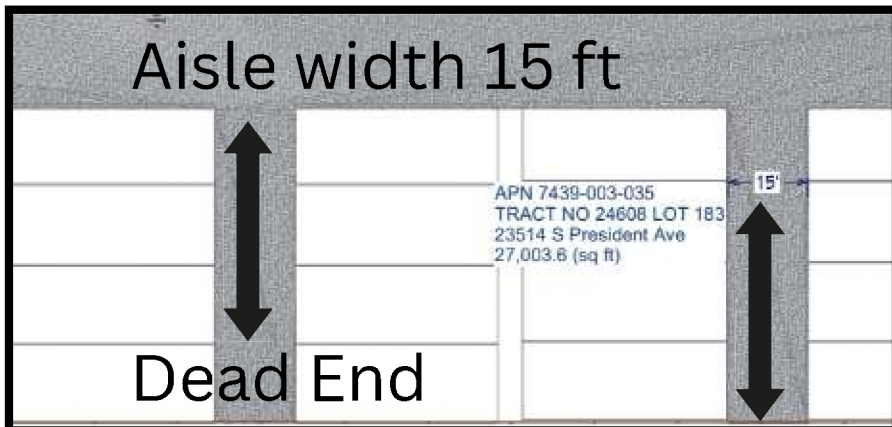
15-Foot Lanes Built Where 24 Feet Is Required

Violates LAMC §12.21 A.5(e)(2) and Title 25 §2110(b)(1)(A)

Harbor City – Narrow Aisles, Blocked Safety Routes

The site plan for 23416 President Avenue shows multiple interior drive aisles only 15 feet wide, well below both the 19-foot minimum required under LAMC §12.21 A.5(e)(2) and the 24-foot standard for two-way fire access recommended by LAFD. This RV park serves 46 units, so every aisle must safely accommodate two-way traffic and emergency vehicles. Worse, three of the 15-foot aisles are dead ends serving eight stalls each, forcing all vehicles to enter and exit the same narrow lane. These are not private driveways; they are functional roadways. The Zoning Administrator wrongly treated them as private access paths, and LADBS approved a plan that clearly puts public safety at risk. Noncompliant circulation is not a technicality, it's a life safety violation that voids the project's Public Benefit status.

Not wide enough for emergency access! Minimum is 19 ft



Wilmington: Same Developer. Same Dangerous Design. This developer used the same underbuilt circulation layout at his Wilmington RV site narrow lanes, dead ends, and no regard for emergency access. This is not 19 feet. It is not safe. LAMC §12.21 and Title 25 §2110 set clear minimums for two-way travel, and this project meets neither. Public safety is not optional. If this design stands in Harbor City, it sets a dangerous precedent for every residential zone in Los Angeles.

Main driveway



54 Utility Island Units Built – Only 39 and 46 Approved

Violation of LAMC §14.00 A.7(9): Hidden Density, Manipulated Plans.

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 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. 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's deliberate misrepresentation to increase density without public review or permit approval.



By [Shayla Girardin](#)

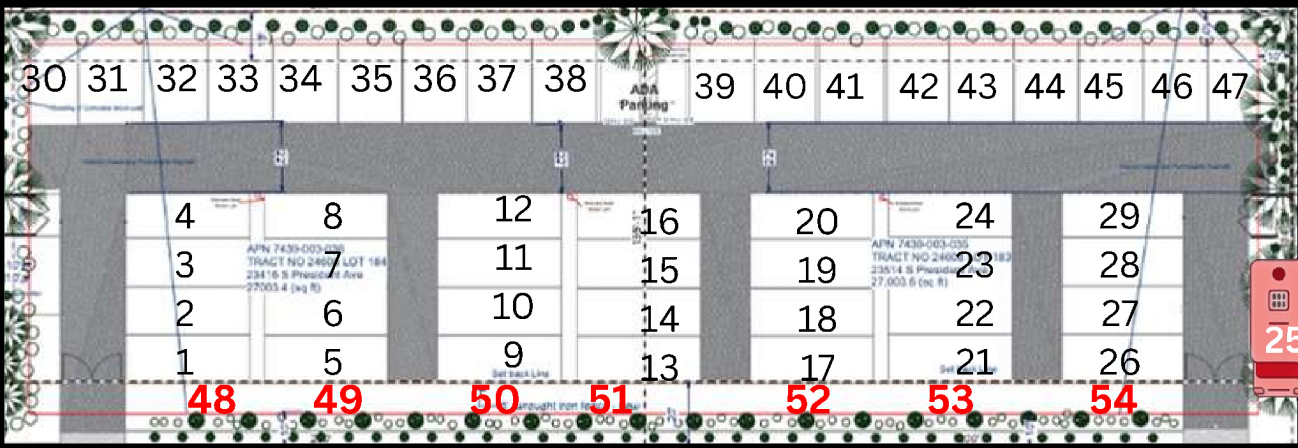
Thursday, June 27, 2024



- Five Utility Island Units Per Row**
- Each row has 5 utility island units for RV connections.
 - This setup creates 54 RV spaces, exceeding approved capacity.
 - Issue: The approved plans never included 54 spaces, raising compliance concerns.

Plans: 7/25/24: Built with the intention of installing 54 RVs Not 46 RVs / No RV stall Measurements yet approved by LADBS

Utility Island units in front of the property in the 20ft buffer

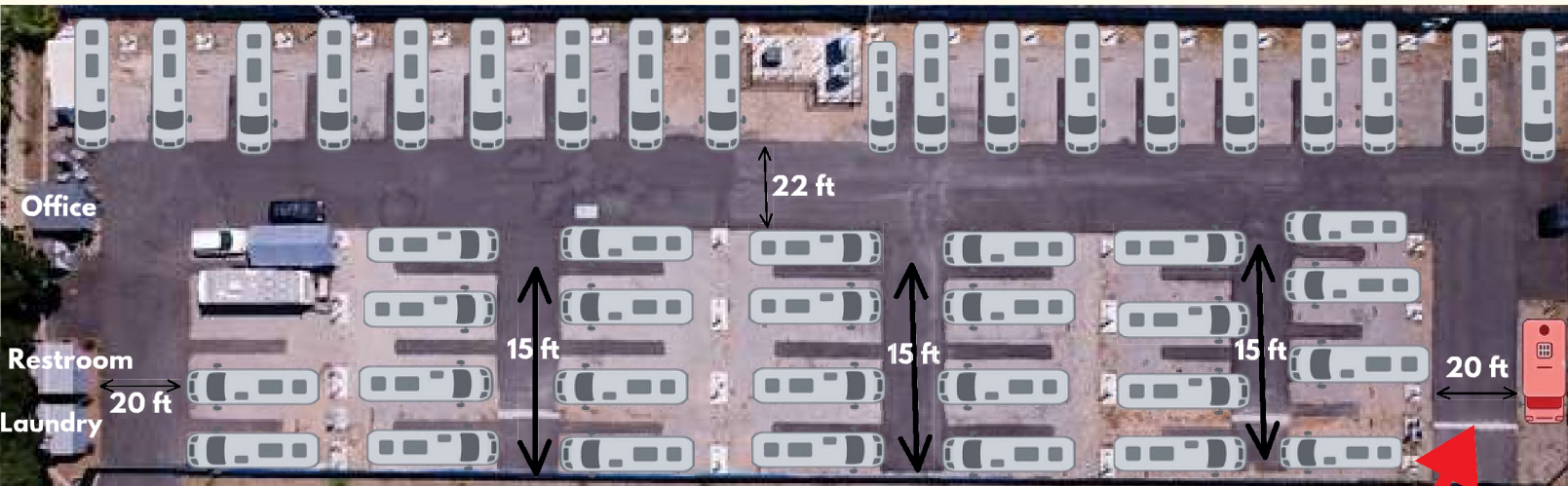


Illegal RV Expansion and Unpermitted Structures

Violates LAMC §§12.21 A.1(a), 91.106.4.1, and §14.00 A.7 – Public Benefit Voided

The developer was approved for 46 RV stalls but has already built 48 and installed utility island hookups in the front buffer zone enabling a total of 54 RVs. He also constructed three prefabricated buildings, likely restrooms or laundry rooms, none of which appear on any approved plans. These additions violate LAMC §12.21 A.1(a) (prohibiting unapproved land uses) and §91.106.4.1 (requiring permits for new structures). RVs now encroach into the required 10-foot landscaped buffer, and the ADA stalls were eliminated to make room for the electrical and methane equipment. This project clearly fails to meet the Performance Standards required under LAMC §14.00 A.7 for Public Benefit eligibility. This is not a clerical oversight it is deliberate zoning abuse that must be stopped. Performance Standard #12 violated

**On plans ADA is 18 feet long, which means the RVs were always going to be in the buffer zone
Violating another performance standard**



Dead End

Dead End

Dead End

LADBS approved conflicting plans where Sheet P1 showed required ADA parking and Sheet P4 placed unmeasured methane-rated electrical equipment in the same location, effectively eliminating accessibility and violating multiple codes.



RV stall not on any of the 3 submitted plans



These 3 structures are **NOT** on any of the 3 submitted plans

Utility Island hookups
Roughins ready to GO
Creates another row of RVs
in the Front 20ft Buffer Zone



Only 46 RVs stalls on Approved plans

Unapproved RV Stall #47 Utility Island hookups Installed Without Authorization intentional noncompliance



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


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

Wilmington: Same Developer, Same Violations, Same LADBS Failure

At the developer’s other RV site 1550 E. L Street (also listed as 1551 Young Street) residents also reported violations of Public Benefit Performance Standards. Just like in Harbor City, LADBS closed the complaints without requiring compliance. To this day, the Wilmington site remains out of compliance. This isn’t a one-time lapse it’s a pattern of zoning abuse enabled by enforcement failure. What happened in Wilmington is now repeating in Harbor City. The CPC must step in where LADBS did not.

2/24/2025	MISCELLANEOUS COMPLAINTS	CLOSED
2/24/2025	MISCELLANEOUS COMPLAINTS	CLOSED
2/24/2025	MISCELLANEOUS COMPLAINTS	CLOSED
2/24/2025	MISCELLANEOUS COMPLAINTS	CLOSED

1550 E L ST

Date Received: 2/24/2025
Description: MISCELLANEOUS COMPLAINTS
Inspector: KELLY WARNER
Phone: (310)732-4531
Status: DUPLICATE SERVICE REQUEST

From: mscooper8@aol.com

Name: Christal Cooper

Date Submitted: 07/23/2025

Council File Number: (e.g. XX-XXXX-SXXX)

Comment:

The attached flyers document additional violations of the mandatory Performance Standards required under LAMC §14.00 A.7 for Public Benefit zoning eligibility. The developer violated Performance Standard #10 by failing to install the required 8-foot wrought iron or masonry fence, leaving a chain-link fence topped with barbed wire that contradicts the approved plans and is incompatible with a residential neighborhood. Performance Standard #5 was violated by entirely omitting the 10-foot landscaped buffer zone, which was instead filled with utility hookups, structures, and hardscape, with no irrigation or plantings. This also violates Performance Standard #9, which requires mitigation of neighborhood impacts like visual blight and noise. Finally, Performance Standard #8 was violated when graffiti was documented on-site before occupancy began, an early sign of neglect that directly contradicts the requirement for ongoing maintenance and cleanliness. These repeated and deliberate violations disqualify the project from Public Benefit approval and warrant revocation of entitlements.

Public Benefit Zoning Undermined: LAMC §14.00 A.7(3) Fence Requirement: Performance Standard 10 Violated

Harbor City - At the Harbor City site, the developer failed to install the 8-foot wrought iron or masonry fence required by LAMC §14.00 A.7(3) for Public Benefit projects in residential zones. Instead, he left the existing chain-link fence topped with barbed wire along the rear property line directly contradicting the approved architectural plans. This is not a minor field change. It is a clear violation of a mandatory Performance Standard and reflects intentional noncompliance. Without meeting all twelve Performance Standards, the project cannot legally qualify for Public Benefit status. No Conditional Use Permit (CUP) has been filed or granted. Therefore, the project lacks valid zoning entitlement and must be revoked.



Wilmington: Same developer Demolished a compliant perimeter wall and replaced it with chain-link fencing topped with barbed wire, a blatant violation of LAMC §14.00 A.7(3), which requires an 8-foot wrought iron or masonry fence for Public Benefit projects. Barbed wire is not only noncompliant, it is inappropriate and unsafe in a residential neighborhood. This deliberate downgrade shows disregard for zoning law and public trust. The repeat violation across two sites shows a clear disregard for zoning law and public safety.



Landscaping Buffer Violated – LAMC §14.00 A.7 Standards #5 (Landscaping Buffer) & #9(Neighborhood Impact)

Harbor City – Where's the landscaping? Where's the buffer? The developer installed utility hookups, prefab structures, and hardscaping inside the required 10-foot landscaped buffer violating LAMC §14.00 A.7 Performance Standards #5 (landscaping) and #9 (parking/neighborhood impact). There is no planting, no screening, no irrigation, and no permits. What was supposed to protect neighbors from visual and noise impacts is now an illegal build zone. This isn't a buffer; it's an encroachment. No compliance means no Public Benefit.



No Landscaping / No 10 ft Buffer



Structures are in the Buffer



No Landscaping / No 10ft Buffer

Wilmington: Same Violations. This is what's coming to Harbor City if CPC does not act. In Wilmington, the same developer filled the required 10-foot buffer with RVs, utility hookups, and unapproved structures, no landscaping, no irrigation, and no enforcement. The pattern is clear: ignore the standards, build for profit, and rely on LADBS not to intervene. Without CPC action, Harbor City becomes the next zoning casualty.



No Landscaping / No Buffer



No Landscaping / No Buffer

Graffiti and Neglect – Violation of LAMC §14.00 A.7(8) Performance Standard #8 Broken Before Occupancy

Harbor City - Graffiti Before Occupancy? Graffiti was documented on the rear fence of the RV park at 23416 President Avenue. This violates Performance Standard #8 under LAMC §14.00 A.7, which requires all Public Benefit properties to be maintained free of graffiti, debris, and signs of neglect. Clean, safe maintenance is not optional, it is a condition of development. If the site is already showing neglect during construction, how will it be maintained long-term? This is a clear warning sign and grounds for immediate revocation of Public Benefit status.



Wilmington: Same Developer. Same Neglect.

The same developer since January 2023, still shows graffiti along its perimeter fence, a continuing violation of LAMC §14.00 A.7(8). This is not a one-time oversight. It's an established pattern of neglect. If this is how the developer maintains an active site, Harbor City should expect the same blight, same decay, and same disregard for community standards.



From : mscooper8@aol.com

Name: Christal Cooper

Date Submitted: 07/23/2025

Council File Number: (e.g. XX-XXXX-SXXX)

Comment:

The attached flyers reveal further violations of the required Performance Standards under LAMC §14.00 A.7, disqualifying the project from Public Benefit status. The developer violated Performance Standard #4 by using incorrect parcel data to shrink the required 20-foot front yard setback to an illegal 17.69 feet. Performance Standard #5 was violated when the developer replaced the required 10-foot landscaped buffer with utility hookups and prefab structures, removing all approved planting and irrigation. Performance Standard #6 was violated by failing to provide 4% parking-area landscaping, instead claiming credit for 10 City-owned trees outside the property line. Performance Standard #9 was violated by offering insufficient, pay-to-park vehicle spaces, forcing residents to park in fire lanes or on public streets, creating safety and circulation hazards. The flyers also document how the developer manipulated stall dimensions across multiple plan sets to avoid detection of buffer and accessibility violations, submitting one version with compliant RV counts and another with increased density but no measurements resulting in LADBS approving incomplete and deceptive plans. These repeated, calculated violations reflect intentional noncompliance with zoning code and render the project ineligible for ministerial Public Benefit approval.

Parking Area Landscaping Violation – LAMC §12.21 A.6 & Performance Standard #6

Required 4% Landscaping Replaced with Dirt and Hookups Not Exempt Under Title 25

Harbor City - The developer replaced the required 10-foot side buffer with utility hookups, prefab structures, and asphalt, violating LAMC §14.00 A.7, Standards #5, #6, and #9. Plans required 60 creeping phlox, 58 barberry plants, 18 olive trees, and 36 Mediterranean cypress to screen the project and meet Public Benefit environmental goals. None were planted. There's no irrigation, no permits, just dirt and concrete where greenery was promised. Now the developer claims 10 crape myrtle trees to meet the 4% landscape requirement. But those trees are City-owned, located beyond the sidewalk and not on the project site. This isn't a landscaped buffer it's a zoning violation. Title 25 does not apply. Without compliance, the project does not qualify for Public Benefit status or ministerial approval.



Wilmington: Same Developer. Same Violations. Where is the 4% landscaping? Where is the buffer? The same developer stripped required landscape areas and replaced them with RV parking, utility boxes, and paving. This is how a green buffer becomes an RV pad, unless the CPC stops it. Title 25 does not override Los Angeles zoning law. If these violations go unchecked, Harbor City will repeat Wilmington's failure.

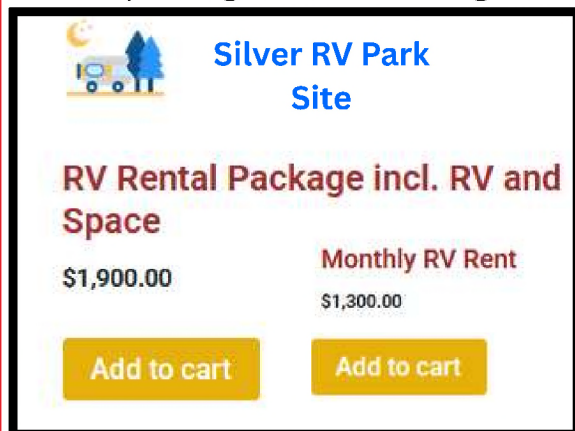


Parking Requirement Removed – LAMC §14.00 A.7(e)

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

	Monthly RV Rent
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

Plan Manipulation: Missing Dimensions, Overbuilt Site

LAMC §12.21 Violated

Harbor City – These three plan sets reveal more than design inconsistencies they document a sustained effort to mislead. At each stage, critical measurements were strategically omitted, buried, or altered to avoid triggering code violations or public scrutiny. The final approved plan excluded all stall dimensions entirely and yet, LADBS approved it. Meanwhile, 47 RVs were built instead of the 46 shown, with ADA parking removed to make room for unpermitted utility structures. Violations of LAMC §12.21, ADA accessibility laws, and Title 25 were effectively concealed. These were not clerical errors they were calculated omissions designed to bypass zoning review. The approval of incomplete, deceptive plans by LADBS represents a failure of enforcement that the CPC must now correct

Plan 1: Jan 7, 2024

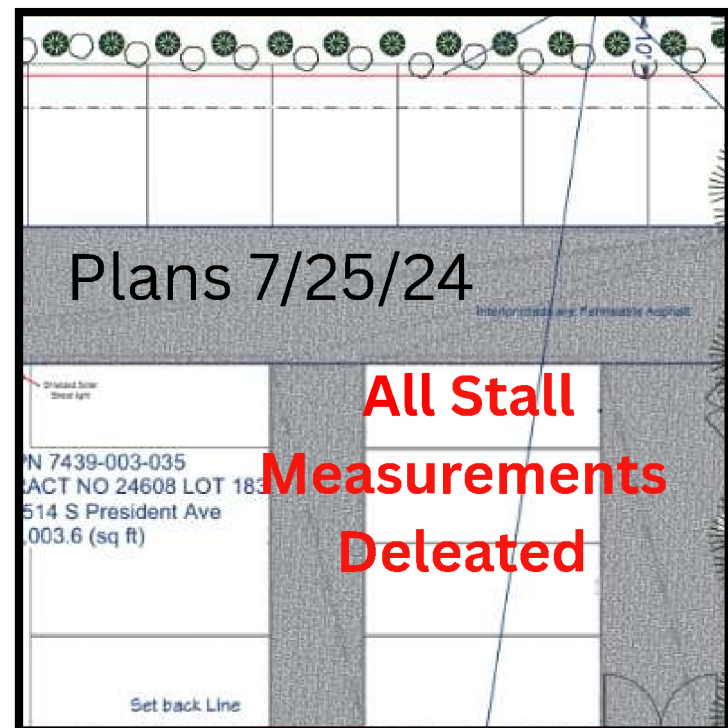
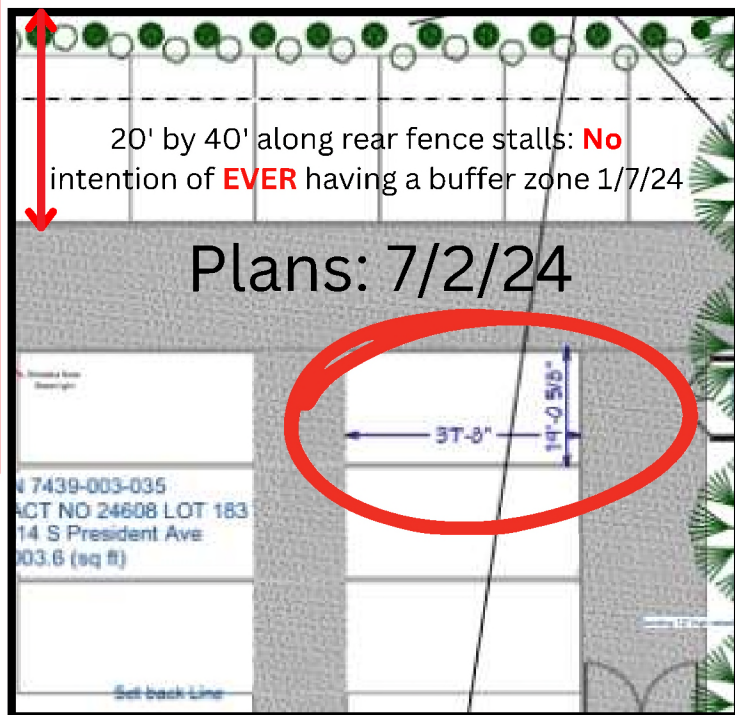
- 46 RVs shown with the middle units stall dimensions of 20" by 37'
- 20' x 40' along rear fence stalls
- ✗ Rear stalls exceed lot depth – erases required 15-ft buffer zone
- ✗ Total depth 135 ft – 20 ft beyond maximum allowed

Plan 2: July 2, 2024

- RV count reduced to 39 – stalls re-aligned to look compliant
- Middle stall sizes now shown correctly
- ⚠ Rear stall dimensions missing
- ➡ Appears compliant only because key data was omitted

Plan 3: July 25, 2024

- RV count increased back to 46
- All stall dimensions removed – nothing shown on layout
- ⚠ LADBS still approved without verifying measurements
- ➡ Omissions concealed buffer, ADA, and stall violations



NOTES: 39 RVs Plans from 7/2/24

THIS IS A 39 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

NOTES: 46 RVs Plans from 1/7/24 exceeds total depth measurements by 20ft

THIS IS A 46 SPOT RV PARK BEING BUILT UNDER LAMC 14.00 A 7 PUBLIC BENEFIT PROJECT
EACH STALL HAS ROOM FOR PARKING 1 RV AND 1 VEHICLE/ ALL LOTS ALONG BACK FENCE ARE 20X40.
ALL REMAINING STALLS ARE 20X37.

Setback Manipulation & Data Errors – LADBS Oversight Failure / LAMC §14.00 A.7

Performance Standard #4 Violation

Harbor City - The developer used three unrelated parcels (26,442 sq. ft.) to reduce the required front setback to 17.69 feet. But the actual site parcels 7438-003-035 and 7438-003-036 totals 53,990 sq. ft. and is zoned R1, which **requires a 20-foot setback** under Performance Standard #4. Even the City’s report shows the prevailing setback is 18.20 feet which still fails the legal minimum. This was a calculated move to shrink the front yard and squeeze in more units. It’s zoning abuse, not 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). The potential for development on this site is 8 SFR. 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;

(R) The required building setback for zone R1 is **20'**, no building, accessory building or structure of any kind is encroaching on this setback.

Not 17.69 ft Developer out of compliance

Not 18.20 ft Director of Planning out of compliance

Mandatory 20 ft setback

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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