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

Comment:

I am writing in strong support of Councilmember Tim McOske's Motion #57, which calls for the City Council to assert jurisdiction over the June 26, 2025 Planning Commission decision concerning the proposed RV park located at 23416 S. President Avenue. In light of that motion, I wish to bring to your attention three significant zoning and planning issues that were not raised during the CPC hearing or previous appeals, as they only became apparent through a detailed review of the approved plan set after the hearing. These newly identified conflicts between plan sheets, buffer zone requirements, and landscaping standards substantially undermine the project's eligibility for ministerial approval under LAMC §14.00 A.7 and merit careful Council review.

1. Conflict Between Plan Sheets – ADA Stall vs. Electrical Infrastructure

There is a clear and unresolved conflict between Sheet P-1 (site layout) and Sheet P-4 (electrical plan). P-1 shows an ADA-compliant parking stall positioned 15 feet from the rear property line, outside both the required setback and 10-foot landscaped buffer, consistent with LAMC §14.00 A.7 and federal accessibility standards.

In contrast, P-4 places an 800-amp Electric Distribution System starting approximately 5 feet from the rear fence and extending an estimated 25 feet in depth. This configuration begins within the 15-foot setback and projects into the area previously designated for ADA parking based on visual comparison, as P-4 lacks any dimensional notations for the electrical system. The result is both a setback violation and the elimination of ADA accessibility.

The placement of permanent electrical infrastructure within the setback and buffer zones is expressly prohibited under Performance Standard #2 of LAMC §14.00 A.7. The fact that the project was constructed according to P-4 rather than the code-compliant P-1 underscores a critical enforcement failure and a serious misrepresentation of zoning and performance standard compliance.

2. Encroachment into the 10-Foot Landscaped Buffer Zone

According to Sheet P-4, approximately 20 utility island pedestal structures were installed as close as 3 feet from the rear property line well within the 10-foot landscaped buffer zone, where permanent structures are clearly prohibited under Performance Standard #2.

By contrast, Sheet P-1 depicts the RV stalls beginning 15 feet from the rear fence, suggesting that utility infrastructure should also remain outside the setback and buffer areas. This discrepancy confirms that the built site reflects P-4's noncompliant configuration, not the zoning-compliant layout approved in P-1. This results in a buffer encroachment that was not disclosed during the Planning Commission hearing.

3. Misrepresentation of Landscaping Compliance

The Director's Determination (DIR-2024-7352-BSA, p. 50) claims compliance with LAMC §12.21 A.6(h) by crediting 10 crepe myrtle trees toward the project's required landscaping improvements. These trees are also listed in the developer's Plant Schedule on page 16 of the plan set.

However, these trees are existing city-owned trees located in the public parkway, not on private property. Trees located in the public right-of-way cannot be credited toward private on-site landscaping obligations under LAMC §12.21 A.6(h) or Performance Standard #3 of LAMC §14.00 A.7, unless they are planted and maintained under a City-approved plan.

This misrepresentation inflates the project's appearance of compliance and raises doubt as to whether it actually meets the minimum on-site landscaping requirements. The use of public trees to meet private zoning obligations is not only misleading, it undermines the integrity of the ministerial approval process under the Public Benefit pathway.

Conclusion and Request

These contradictions spanning conflicting plan sheets, missing dimensions, and misrepresented compliance were not addressed during the Planning Commission hearing or appeal process. Yet they raise serious concerns regarding ADA access, zoning enforcement, and the validity of the project's ministerial approval under the Public Benefit zoning pathway.

Given these findings, I respectfully urge the City Council to include these issues in its formal review under Motion #57. I have included aerial imagery and visual comparisons documenting the conflict between the approved plans and the built site. Should additional documentation be helpful, I would be happy to provide it.

Thank you for your time and attention.

[Documentation](#)