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October 31, 2025

Honorable Members of the City Council  
City of Los Angeles  
City Hall, Room 395  
Los Angeles, CA 90012

**Report from the Department of Building and Safety for the specific allegations for the proposed Recreational Vehicle Park failing to meet to comply with the applicable performance standards. (CF 24-0711-S1)**

## **BACKGROUND**

On August 19, 2025 City Council adopted the motion in Council File 24-0711-S1 instructing the Los Angeles Department of Building and Safety (LADBS) to provide a written response for the specific allegations for the proposed Recreational Vehicle (RV) Park located at 23416 S. President Avenue failing to meet to comply with the applicable performance standards pursuant to Los Angeles Municipal Code Section 14.07 for Public Benefit projects.

The subject project is a use of land permit for a new RV Park in the R1-1XL-O Zone in Harbor City.

On March 22, 2024, Building Permit No. 23020-10000-02232 was issued for the use of land for a new RV Park as a Public Benefit Project and the permit was closed on June 28, 2024 to prevent any inspections. On July 9, 2024, an application was submitted to LADBS under Building Permit No. 24026-10000-00086, supplemental to Building Permit No. 23020-10000-02232 to capture compliance with outstanding performance standards; this supplemental permit has not been issued.

## **FINDINGS**

LADBS compiled and reviewed all the allegations related to the RV park and provided a response to each allegation. The following discussion addresses each claim and provides responses from LADBS:

### **Allegation No. 1:**

The utility plans (Sheet P-4) are from the January 2024 plan set, which conflicted with Performance Standard #2 (a 15-foot setback from adjacent residential uses, free of all structures, paving, and utility infrastructure) and Performance Standard #5 (a 10-foot landscaped buffer, free of all structures, paving, and utility infrastructure). The correction was made to the site plans in the July 2024 submission, but I do not believe the utility plans were ever updated to reflect compliance. This means construction is proceeding according to the January 2024 utility plans.

#### **LADBS Response to Allegation No. 1:**

LAMC 12.22 A.2, does not limit or interfere with the installation of structures for public utility purposes to be placed within any required yard setbacks or landscape buffers.

### **Allegation No. 2:**

Pedestal Count Increase – Sheet P-4 shows 49 utility pedestals rather than the approved 46, which is an unauthorized increase in RV rental capacity. The pedestals are represented as small rectangular symbols on the plan, making the overage easy to miss at first glance but significant in impact.

#### **LADBS Response to Allegation No. 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.

### **Allegation No. 3:**

Electric Distribution System Placement – An 800-amp electrical distribution system (36' x 24') shown on Sheet P-4 is located in the same space as the ADA parking, eliminating required accessible spaces.

#### **LADBS Response to Allegation No. 3:**

The approved plans on P-3 do not indicate any obstruction or utilities in the disabled access parking stalls. The utility structure on P-4 appears to be located adjacent to the rear fence. The disabled access parking stalls shall be located within the parking area referenced on the plans. Failure to comply with the approved set of plans would result in the field correction and subject to further plan review.

### **Allegation No. 4:**

Improper Landscaping Credit – Sheet P-1 claims 4% landscaping compliance by counting ten crepe myrtle trees located in the public parkway. Public Benefit Performance

Standards require qualifying landscaping to be located within the project parcel boundaries, not in the public right-of-way. Using city-owned trees for private landscaping credit is a zoning violation.

**LADBS Response to Allegation No. 4:**

The approved plans indicate credit for street trees to count towards landscaping. The plans were stamped and approved by the Department of City Planning. This is in compliance.

**Allegation No. 5:**

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

There are allegations there are unpermitted structures, prefabricated buildings on the site.

**LADBS Response to Allegation No. 5:**

Construction is not yet completed. The approved plans indicate compliance with performance standards. Compliance will be verified during final inspection and Certificate of Occupancy will not be issued unless the site is developed per the approved plans.

**Allegation No. 6:**

Performance Standard No. 2: The use is conducted in conformance with the City's noise regulations pursuant to Chapter 11 of this Code.

**LADBS Response to Allegation No. 6:**

Performance Standard met, no allegation regarding non-compliance

**Allegation No. 7:**

Performance Standard No. 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.

- Installed in the front but not the rear.
- There is a chain link fence topped with barbed wire instead

**LADBS Response to Allegation No. 7:**

Construction is not yet completed. The approved plans indicate compliance with performance standards. Compliance will be verified during final inspection.

### **Allegation No. 8:**

**Performance Standard No. 4:** The front yard setback is at least as deep as the setback required by the zone.

- The prevailing setback calculated on plans is not correctly calculated. Uses only three properties and provides a setback of only 17.67 feet.
- Prevailing setback should be calculated using exact measurements, not ZIMAS tools.
- The site was constructed with a FYSB of only 17.69 feet instead of 20 feet.
- A 20-foot FYSB is required.
- The site is not built with a 20-foot front yard setback as required.
- With a 20-foot front yard setback, the project cannot fit 46 RVs.
- The plans exceed the physical dimensions of the site. Plans show a depth of 153 feet.

### **LADBS Response to Allegation No. 8:**

Prevailing setback calculation will need to be verified by plan check. Applicant will need to return LADBS with prevailing setback calculations compliant with LAMC 12.07.C.1. Per Performance Standard No. 4, the front yard setback shall be as deep as the setback required by the zone. See response to allegation No. 2 in relation to RV spaces. Site dimensions are consistent with those found in the most recent county assessor maps. Since construction is not yet complete, compliance will be verified during final inspection.

### **Allegation No. 9:**

**Performance Standard No. 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.

1. The property lacks the required irrigation system.
2. The front, side and rear buffer areas were stripped and replaced with utility island hookups and hardscape.
3. There are approximately 20 rough-ins for 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. These installations permanently affixed to concrete pads and containing electrical, sewer, or methane connections are classified as structures and their placement in required setback and buffer areas is prohibited, even though the applicant claims the landscaping can be installed around them.
4. RV stalls are encroaching into the required buffer, eliminating landscaping.

5. Prefab buildings, presumably for bathrooms and laundry, are located inside the entrance of the gate on the north side where the landscaped buffer is supposed to be.
6. The number of hookups indicate a project with 47, 49, 52, 53, or 54 spaces, when only 46 were approved. Overbuild raises infrastructure capacity and fire safety concerns. Plans submitted show 47 stalls; 6, 7, or 8 more hookups are an expansion of the project.
7. Built in accordance with electrical plans (Plan Sheet P-4, from January 2024, which didn't include the landscaped buffer, prior to the plans approved by City Planning August 1, 2024) that conflicts with plans approved by City Planning (Plan Sheet P-1), including encroachments into required setbacks, encroachments into required setbacks, unpermitted increases in infrastructure, removal of ADA spaces.
8. The landscaped buffer has been removed.
9. Failure to install the required landscaping.

#### **LADBS Response to Allegation No. 9:**

1. Site has irrigation installed, performance standard doesn't indicate the amount irrigation
2. Construction is not yet completed. The approved plans indicate compliance with performance standards.
3. LAMC 12.22A2, allows the installation of structures for public utility purposes to be placed within any required yard setbacks and landscape buffers.
4. Recommendation from Zoning Administrator to revise encroachment
5. Construction is not yet completed. The approved plans indicate compliance with performance standards.
6. LADBS does not enforce number of stalls, see response to Allegation #2
7. See response to Allegation #1
8. Construction is not yet completed. The approved plans indicate compliance with performance standards.
9. Construction is not yet completed. The approved plans indicate compliance with performance standards. Compliance will be verified during final inspection.

#### **Allegation No. 10:**

Performance Standard No. 6: Parking areas are landscaped pursuant to the requirements of Section 12.21 A.6.

1. At least 4% of a parking area is required to be landscaped with trees, shrubs, and ground cover.
2. Approved plans required installation of 60 creeping phlox, 58 barberry plants, 18 olive trees, and 36 Mediterranean cypress trees. Only 8 King Alexander Palms have been installed.
3. Vegetation and trees at the front of the property have been removed.
4. The applicant has erroneously counted the 10 Crepe myrtle trees in the public right of way as part of provided landscaping. Trees located in the public ROW cannot

be credited towards landscaping obligations unless they are planted and maintained under a City-approved plan.

5. Misrepresentation inflates the project's appearance of compliance.
6. The landscaping provided is misrepresented and less than required.
7. The utility hookup pedestal/islands, electric distribution system, methane gas mitigation equipment replace required landscaped.
8. Areas for parking are supposed to be landscaped, which is not there.
9. Failure to install the required landscaping.

#### **LADBS Response to Allegation No. 10:**

Construction is not yet completed. The approved plans indicate compliance with performance standards. Compliance will be verified during final inspection.

#### **Allegation No. 11:**

Performance Standard No. 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 plans approved by DCP show no buildings, so the one sign is shown mounted to the right of the left entry gate (northerly gate).
- Allegations that there are prefabricated buildings on the site.

#### **LADBS Response to Allegation No. 11:**

Construction is not yet completed. The approved plans indicate compliance with performance standards. Compliance will be verified during final inspection.

#### **Allegation No. 12:**

Performance Standard No. 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 rear chain link fence with privacy tarp contains graffiti that has not been removed as required.

#### **LADBS Response to Allegation No. 12:**

Construction is not yet completed. The approved plans indicate compliance with performance standards. Compliance will be verified during final inspection.

#### **Allegation No. 13:**

Performance Standard No. 9: The use meets the parking requirements of Section 12.21 A.

- The project does not provide any/sufficient or required parking.
- Removed all onsite parking after obtaining permits.
- RV stalls are situated side by side with no adjacent vehicle spaces.
- The site does not have the space to provide off-street parking for the number of RV spaces shown.
- The drive aisle is only 15 feet wide and it should be 19 feet wide per Section 12.21 A.5(e)(2) and 24 feet wide per fire safety recommendations for two-way vehicular traffic. Multiple interior aisles are only 15 feet wide and the main aisle is only 22 feet wide. Three of the 15-foot aisles serve eight RV stalls and terminate at a dead-end fence, meaning vehicles must enter and exit along the same narrow path, which constitutes a two-way traffic lane and fails to meet the required standard.
- The ADA parking spaces have been removed to make room for an 800A Electric Distribution System.
- The developer wrongly claims an exemption under Title 25, which applies only to mobile home parks. Section 12.21 A and 14.00 A.7 still apply to this RV park.
- Local governments have the authority to “adopt ordinances, rules, regulations or resolutions” governing park perimeter walls, signs, access, and vehicle parking for RV parks. Local parking requirements apply to RV parks; they are not exempted.

#### **LADBS Response to Allegation No. 13:**

LAMC Section 12.21A does apply. 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.

#### **Allegation No. 14:**

Performance Standard No. 10: All streets, alleys, or sidewalks adjoining the property meet standard street dimensions.

#### **LADBS Response to Allegation No. 14:**

Performance Standard met, no allegation regarding non-compliance

#### **Allegation No. 15:**

Performance Standard No. 11: There are no outdoor public telephones on the site.

#### **LADBS Response to Allegation No. 15:**

Performance Standard met, no allegation regarding non-compliance

#### **Allegation No. 16:**

Performance Standard No. 12: Security night lighting is shielded so that the light source cannot be seen from adjacent residential properties.

## **LADBS Response to Allegation No. 16:**

Performance Standard met, no allegation regarding non-compliance

### **CONCLUSION**

These allegations made regarding the non-compliance with the performance standards according to LAMC Section 14.00 A.7 cannot be evaluated at this time, because Building Permit No. 23020-10000-02232 is currently at Permit Closed status and the issuance of supplemental Building Permit No. 24026-10000-00086 is pending. This prevents any inspections to be conducted and Certificate of Occupancy to be issued.

Once the supplemental permit is issued, the applicant will be required to develop the site as it is shown with the approved plans. Prior to the issuance of the Certificate of Occupancy, the site will be inspected to determine if the performance standards are met.

Additionally, the prevailing setback to determine the front yard setback in Performance Standard no. 4 requires further analysis. The applicant will need to return to LADBS to verify compliance with LAMC 12.07.C.1, prior to issuance of the supplemental permit, to verify the front yard setback.

Therefore, the applicant will need to return LADBS with updated plans with correct prevailing setback calculations to verify the front yard setback and obtain the supplemental permit and proceed to develop the site. Once the site is developed in accordance with the approved plans, these allegations and claims can be investigated further.

**Should you have any questions, please contact Allen Manalansan by email at [Allen.Manalansan@lacity.org](mailto:Allen.Manalansan@lacity.org).**

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