

Communication from Public

Name: Christal Cooper

Date Submitted: 12/01/2025 06:28 AM

Council File No: 24-0711-S2

Comments for Public Posting: The approved Harbor City site plan (Sheet P-1, stamped 8/1/2024 and dated 7/25/2024) contains an explicit note box stating that the project complies with “State of California Code of Regulations, Title 24” and “State of California Code of Regulations, Title 25, Division I, Chapter 2.” Yet on the very same sheet there are no restroom, shower, laundry, or service buildings shown anywhere, and no notation that all spaces are restricted to self-contained/independent RVs. Under 25 CCR §1002, every one of the 46 spaces is therefore legally presumed dependent. Dependent spaces trigger mandatory service buildings under 25 CCR §§1524, 1530, 1532, 2005, and 2106, including separate men’s and women’s toilets, showers, lavatories, laundry facilities, slop sinks, and accessible routes. The plan set also provides full sewer, water, and 50-amp electrical hookups at every space, and utility-island pedestals at each site, which confirms the park is designed for dependent RVs that rely on external sanitation infrastructure, not independent self-contained units. For a 46-space dependent RV park, these Title 25 requirements translate into a substantial service-building complex—typically 1,200–1,600 square feet to accommodate men’s and women’s restrooms (3 toilets for men and 5 for women), at least 3 showers for each gender, multiple lavatories, an ADA-compliant stall and shower, a laundry room with required clearances, and a service sink, all connected by accessible routes. None of these required facilities appears on any approved plan sheet for Harbor City, Wilmington, or North Hills. The identical omission appears in the Wilmington and North Hills projects, and Wilmington is already operating without proper Title 25 service buildings, instead relying on unpermitted “Tuff Sheds” constructed under three voided LADBS permits. These facilities were not “forgotten”—they were never included, allowing the developer to avoid one of the most expensive components of a Special Occupancy Park and to bypass full ADA/Title 24 scrutiny. Under 25 CCR §2005, required service buildings must be shown on the submitted plans and cannot be treated as an afterthought. When a building permit and ministerial clearance are issued for a park that omits mandatory Title 25 facilities, that permit is issued in error under LAMC §91.106.4 and is subject to immediate revocation under LAMC §98.0805. No lawful Certificate of Occupancy or

Permit to Operate may be issued while these violations exist, and Health & Safety Code §§18865 and 18871.3 authorize significant civil penalties for constructing or operating a noncompliant park. The PLUM Committee has already acknowledged LADBS error on Performance Standards 3–5 but has not yet confronted this far more fundamental Title 25 defect, which voids the entire ministerial basis for approval. In light of the repeated omissions across Harbor City, Wilmington, and North Hills, this is not an isolated mistake but a deliberate pattern of noncompliance. Council must sustain the appeal in full, direct LADBS to revoke the erroneous permit, require discretionary CUP/CEQA review, and terminate this project rather than reward a documented pattern of violations.

Communication from Public

Name: Nicole Paulsen Kahane

Date Submitted: 12/01/2025 08:02 AM

Council File No: 24-0711-S2

Comments for Public Posting: See the attached for consideration at the upcoming hearing on December 2, 2025. Thank you.

Honorable Councilmembers:

I respectfully submit this written public comment urging the Los Angeles City Council to **require a Conditional Use Permit (CUP)** for the proposed RV Park pursuant to **LAMC 14.00 A.7**, and to **veto and remand** the prior approval that allowed the project to proceed without discretionary review. Based on the governing municipal code provisions, state law requirements, and the administrative record, the project is **not lawfully created** and therefore cannot qualify for ministerial approval.

I. RVs Are Not Housing Under California Law

A. RVs Are Vehicles, Not Dwelling Units

Under California law:

- **Health & Safety Code (HSC) §18010** defines a “Recreational Vehicle” as a motor vehicle designed for “**human habitation for recreational, emergency, or other temporary occupancy.**”
- **Vehicle Code §362** defines a vehicle as a device for travel on a highway.
- **RVs are registered with the DMV**, not with HCD as residential structures.

B. RVs Do Not Meet the Definition of Housing Under LAMC

- **LAMC §12.03** defines a “*Dwelling Unit*” as a **building or portion of a building** designed for residential use.
- RVs are **not buildings**, nor do they meet the criteria for R-1 or R-3 occupancies under **Title 24, Part 2 (California Building Code)**.

C. RV Parks Are Classified as Temporary Occupancy Uses

Under state law:

- **HSC §18862.43** defines RV parks as **Special Occupancy Parks**, intended for **temporary**, not permanent, residence.
- **Title 25, Division 1, Chapter 2** applies to RV parks and mandates their regulation as temporary-occupancy parks.

RVs and RV parks cannot be considered or treated as permanent residential housing under any applicable building, zoning, or housing code.

II. “Lawfully Created” Under LAMC 14.00 A.7 Requires Compliance With All Code Requirements & State Law

A. LAMC 14.00 A.7 Limits Ministerial Approval to Projects Meeting All 12 Performance Standards

LAMC 14.00 A.7(a)(1)–(12) sets forth 12 mandatory performance standards governing:

1. Minimum lot size and configuration
2. Minimum space size
3. Separation distances between units
4. Permanent vehicular access
5. Required restroom and sanitation facilities
6. Utility connections (water, sewer, electrical)
7. Trash and solid waste requirements
8. Fire access and spacing
9. Landscape requirements
10. Safety lighting
11. Management office requirements
12. Compliance with all applicable **state laws, including Title 24 & Title 25**

Under the ordinance, “**Failure to meet *any* one standard renders the project *not lawfully created* and requires a Conditional Use Permit.**”

It is undisputed that the developer failed to comply with **three** of the performance standards—therefore a CUP became immediately mandatory.

B. The Term “Lawfully Created” Requires Review of State Law

Because LAMC 14.00 A.7(a)(12) requires compliance with **all state laws**, the City must confirm compliance with:

- **Title 24, California Building Code (CBC)**
- **Title 25, Mobilehome Parks & Special Occupancy Parks Code**
- **HSC §§18010–18874**

- **LAMC Chapter IX (Los Angeles Building Code), adopting Title 24**

A project **cannot** be “lawfully created” unless it satisfies *all* governing legal requirements.

The developer has **not** demonstrated full compliance with Title 24 or Title 25.

III. A Conclusory Plan Note Stating “Complies With Title 24 and 25” Does Not Legally Establish Compliance

Under:

- **LAMC §93.0201 (Plan Check Submittal Requirements)**
- **LAMC §91.101.5 (Proof of Compliance Required)**
- **HSC §18613 (Prohibition on operation without compliance)**

Compliance must be **proven**, not claimed.

A plan note stating “complies with HSC Title 24 and 25” is **not legally sufficient** because:

- Title 24 requires detailed structural, fire-life-safety, mechanical, and utility drawings.
- Title 25 requires **complete RV park infrastructure plans**, including spacing, sewer, water, electrical, fire access, and emergency systems.
- Nothing in Title 24, Title 25, or the LAMC permits **self-certification by the applicant** as a substitute for compliance.

Therefore, the developer’s plan language is legally meaningless without documentary evidence.

IV. The City’s Own Records Show Fragmented Oversight & Missing Inter-Agency Coordination

LAMC 14.00 A.7 requires compliance with **all applicable laws**, yet:

- **LADBS** reviews only Title 24 issues.
- **City Planning (CPC)** reviews zoning compliance.
- **HCD** has jurisdiction over Title 25 infrastructure.

None of these agencies independently ensures cross-compliance with the others.

This lack of coordination, combined with multiple unmet performance standards, makes ministerial approval unlawful. **CUP review is the only mechanism that ensures unified review, public notice, environmental assessment, and agency coordination.**

V. Ordinance No. 188753 Confirms RV Parks Pose Serious Health & Safety Risks

The City's Interim Control Ordinance (Ord. **188753**) explicitly found:

- RV parks create **serious health and safety hazards**
- RV parks pose **public welfare risks**
- RV park residents face **unsafe living conditions**
- The existing regulatory structure is **inadequate**

Because RV parks are **not housing**, and because they create documented fire, sanitation, and life-safety risks, the City cannot lawfully allow an out-of-compliance RV park to proceed ministerially.

VI. Conclusion & Requested Action

Based upon the foregoing, the project is **not lawfully created, fails multiple performance standards**, and **must undergo a Conditional Use Permit review**.

I respectfully request that the City Council:

1. **Veto** the prior action allowing the project to proceed without a CUP;
2. **Determine that a CUP is required under LAMC 14.00 A.7;**
3. **Remand the project** for full discretionary review, including environmental, public safety, and neighborhood impact analysis.

Thank you for your attention to this matter and for your commitment to public safety and the integrity of the Municipal Code.