

Communication from Public

Name:

Date Submitted: 11/30/2025 02:10 PM

Council File No: 24-0711-S2

Comments for Public Posting: I OPPOSE this project because the City recently passed an Interim Control Ordinance halting RV Park permitting due to safety issues and lack of regulation. Allowing this one project to move forward despite the Interim Control Ordinance would create inconsistent policy and jeopardize public welfare.

Communication from Public

Name: Thelma Kushimaejo

Date Submitted: 11/30/2025 01:28 PM

Council File No: 24-0711-S2

Comments for Public Posting: I oppose the Silver RV Park because it threatens the safety and health of our neighborhood. Residents were never properly notified, the site sits on former oil/water wells with no public environmental testing, and it crams too many RVs into a space our infrastructure can't support. This park's operator has a documented history of problems at his other sites, too. This project carries a high risk of fire, crime, and sanitation issues. This is not a public benefit — it is a public hazard.

Communication from Public

Name: Christal Cooper

Date Submitted: 11/30/2025 01:39 PM

Council File No: 24-0711-S2

Comments for Public Posting: This submission provides evidence that the approved plan set for 23416 S. President Ave was incomplete and legally deficient under Title 25, Title 24, and LAMC §§91.106.4 and 98.0805. As detailed in the attached letter, none of the required Title 25 service buildings—restrooms, showers, laundry, or accessible routes—appear anywhere in the approved plans, and the HCD MP-514 form confirms that the same incomplete plan set was submitted to HCD. Because no plan set restricts all spaces to independent units, the project must be treated as containing dependent spaces under 25 CCR §1002, triggering mandatory sanitary and service-building requirements omitted from the plans. The evidence shows the permit was improperly issued on an incomplete plan set and is subject to revocation. This material is provided for the December 2 PLUM hearing so Councilmembers and the public may review the state-law violations and enforcement implications.

Earlier today, I submitted correspondence regarding a serious state-law compliance defect in the approved plan set for 23416 S. President Avenue, currently before the City Council under CF 24-0711-S1 and S2. I am writing now to supplement that submission with newly referenced evidence confirming that all agencies reviewed and approved an incomplete plan set that omitted mandatory Title 25 Special Occupancy Park facilities.

The plans approved by LADBS and transmitted through CPC do not show any of the required restroom, shower, laundry, or service buildings mandated under 25 CCR §§1524, 1530, 1532, 2005, and 2106. These facilities—and the accessible routes to them—are required for every Special Occupancy Park containing dependent spaces. The approved plans contain no notation restricting all spaces to independent/self-contained units, and under 25 CCR §1002, the spaces must therefore be treated as dependent, triggering the full sanitary and service-building requirements.

Critically, the HCD Local Approvals / Government Agency Approval Form (HCD MP-514) included in the plan set confirms that the applicant submitted the same plan sheets to HCD *exactly* as submitted to LADBS and CPC—with no required facilities shown anywhere. HCD's receipt acknowledgment does not validate the omission; it simply confirms that HCD was notified. This establishes that the applicant presented an incomplete plan set to every reviewing agency, and that the project was approved without the state-mandated service buildings required for a Special Occupancy Park.

Because these required facilities are entirely absent, the plan set was incomplete at the time of approval, and the permit appears to have been issued in error under LAMC §91.106.4 and subject to revocation under LAMC §98.0805. Further, "Stage 2" construction does not cure state-law violations, and the missing buildings cannot legally be added through a plan correction under LAMC §91.106.3. Constructing the required facilities now would constitute new work, requiring new discretionary review, ADA/Title 24 access analysis, CEQA review, and public hearings.

Health & Safety Code §18865 prohibits the operation or permitting of any RV park lacking mandatory sanitary and service facilities. Violations are enforceable under HSC §§18866.5 and 18871 et seq., with penalties up to \$10,000 per day.

I have also referred these materials to the California Department of Housing and Community Development (HCD) – Codes & Standards Enforcement Unit. Because the approved plan sets omit every mandatory sanitary and service building required under Title 25, I have requested that HCD review the plans submitted through the HCD MP-514 Local Approvals Form and determine whether these parks were approved on incomplete plan sets in violation of 25 CCR §§1524, 1530, 1532, 2005, and 2106. If confirmed, HCD has authority to open enforcement cases, issue Orders to Comply, and prohibit occupancy under Health & Safety Code §18865 until all required facilities are constructed, inspected, and approved. HCD's involvement is

necessary to ensure compliance with state Special Occupancy Park requirements and to prevent further reliance on incomplete or non-conforming plan sets.

This evidence has been provided to the City Clerk for the December 2 hearing and forms part of the administrative record. Given the seriousness of these defects, I respectfully request that LADBS and City Planning immediately advise the City Council that the approval was based on an incomplete plan set missing all state-mandated facilities, and that the project cannot lawfully continue under ministerial processing.

Communication from Public

Name: Nicole Paulsen Kahane

Date Submitted: 11/30/2025 11:53 AM

Council File No: 24-0711-S2

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

Councilmembers:

I submit this comment to address the City's legal obligations under **LAMC §14.00 A.7** and to demonstrate why the proposed RV Park project cannot be processed ministerially and must be required to obtain a **Conditional Use Permit (CUP)**.

THE “LAWFULLY CREATED” REQUIREMENT IS A THRESHOLD CONDITION

LAMC §14.00 A.7 applies only to uses that were “**lawfully created.**” Although the section does not define the term, the City is required to interpret it in conjunction with **LAMC §12.03** and longstanding municipal code principles governing lawful establishment of uses.

Under these provisions, a use is “lawfully created” only if it was:

1. Permitted under the zoning in effect at the time;
2. Established pursuant to all required ministerial and discretionary permits;
3. Constructed and operated in full compliance with the performance standards and applicable regulations then in effect.

A use that fails to satisfy **any** of these criteria is **not** deemed lawfully created and cannot claim ministerial treatment under §14.00 A.7.

FAILURE TO MEET PERFORMANCE STANDARDS PRECLUDES LAWFUL CREATION

Section 14.00 A.7 contains **12 mandatory performance standards** at the outset that must be met **prior** to qualifying as a lawfully created use. In this case, the applicant has failed to demonstrate compliance with at least **three** of these required standards per the CPC and LADBS' testimony at the November 17, 2025 PLUM Committee hearing.

Most recently, it was discovered that the plans approved by LADBS and transmitted through CPC omit all mandatory restroom, shower, laundry, and service buildings that are required under Title 25 CCR §§1524, 1530, 1532, and 2106, as well as the accessible routes required by Title 25 CCR §2005. These facilities are mandatory in every RV park containing dependent spaces (as this one does) and must be included in the submitted plans before any ministerial approval under LAMC 14.00 A.7. The approved plans contain no notation whatsoever that all RVs are independent/self-contained; therefore, the park is presumed to contain dependent spaces requiring full service buildings under 25 CCR §1002.

Because the project contains 46 dependent RV spaces, 25 CCR §1532 requires full restroom, shower, and laundry facilities on-site. The complete omission of these buildings on the plans renders the plan sets incomplete at the time of approval and the permit appears to have been issued in error under LAMC §91.106.4, which allows permits to issue only on complete and conforming plans. It is therefore subject to revocation under LAMC §98.0805, which authorizes revocation when a permit was “issued in error.” “Stage 2” construction status does not cure, postpone, or excuse noncompliance with Title 25, and these facilities cannot be added through a simple plan correction under LAMC §91.106.3. Adding the required buildings now would constitute

new construction requiring discretionary review, ADA/Title 24 accessibility evaluation, CEQA analysis, and public hearings.

The structure of §14.00 A.7 is unambiguous:

The failure to satisfy even one performance standard disqualifies the use from being lawfully created and triggers the requirement for a cup.

There is no provision in the code authorizing after-the-fact corrections, iterative plan adjustments, or “fix-it” opportunities to bring a noncompliant proposal into compliance in order to avoid discretionary review. Ministerial processing is permissible **only where all standards are met at the outset**.

The City’s continued allowance of plan modifications to pursue compliance is inconsistent with the mandatory language of the ordinance.

STATE HEALTH & SAFETY CODE (TITLES 24 & 25) REQUIRE EVIDENCE — NOT ASSERTIONS

The developer’s plans also indicate compliance with Title 24 and 25, when in fact they do not. A mere statement on the plans does not deem actual compliance. A statement on plans such as “This project complies with Title 24 and Title 25” has no legal effect unless the plans actually show, demonstrate, and document how those standards are met.

A simple note on the plans that says “we comply” does **not** satisfy these requirements. State law requires: (1) The plans to show the **actual design**; (2) Engineering details; (3) Dimensions and spacing; (4) Utility system diagrams; (5) Calculations, clearances, and code citations; and (6) Compliance documentation upon request.

HCD (the state agency with jurisdiction over RV parks) reviews compliance based on *what is drawn, what is engineered, and what is calculated* — **not what is asserted**.

A BLANKET “COMPLIANCE” NOTE DOES NOT SHIFT RESPONSIBILITY TO THE CITY

Developers sometimes place “catch-all” notes on plans to imply: *“If something is wrong, you approved it, so it’s on you.”*

Courts reject this approach. The responsibility to demonstrate compliance remains with the **applicant**, not the City.

A claim of compliance without evidence is treated the same way as: (1) Missing information; (2) Incomplete plans; or (3) Non-compliance which, under §14.00 A.7, triggers a **CUP requirement**.

UNDER §14.00 A.7, FAILURE TO DEMONSTRATE COMPLIANCE = FAILURE TO MEET A PERFORMANCE STANDARD

Because 14.00 A.7 is ministerial, the City cannot “assume” compliance. The City cannot use discretion to “interpret” compliance. The City must see actual, objective compliance **on the plans themselves**.

As testified by the CPC and LADBS at the November 17, 2025 PLUM Committee hearing, the plans do not comply with all 12 performance standards, and as recently discovered, do not show all mandatory restroom, shower, laundry, and service buildings per the Health and Safety Code governing Special Occupancy Parks.

And once even **one** performance standard fails, **a CUP is required** under the ordinance.

ALLOWING THE DEVELOPER TO SUBMIT A GENERIC COMPLIANCE NOTE VIOLATES STATE LAW

Under Title 25, the City has **no authority** to accept a blanket note of compliance as proof.

HCD regulations require: (1) Engineering drawings; (2) Utility diagrams; (3) Clearances; (4) Calculated distances; and (4) Specific technical details. A plan that does not contain these is **not approvable**.

Thus, a generic statement is legally insufficient and cannot be treated as compliance.

ONCE THE PROJECT FAILED ANY STANDARD, THE CITY WAS OBLIGATED TO REQUIRE A CUP

Because the applicant did not meet all 12 performance standards as confirmed by the CPC and LADBS at the November 17, 2025 PLUM Committee hearing, **the project cannot be considered lawfully created under §14.00 A.7**, and the code mandates that the project proceed through a **Conditional Use Permit** pursuant to §14.00 A.7(b).

A CUP is not optional. It is the required procedure for any RV park use that is not in full compliance with the performance standards at the time of application.

LACK OF COORDINATION AMONG LADBS, CPC, AND HCD UNDERMINES COMPLIANCE AND DUE PROCESS

A further barrier to lawful creation of this use is the **absence of coordination** between the key agencies responsible for RV park oversight: **LADBS**, the **City Planning Commission**, and the **California Department of Housing and Community Development (HCD)**.

- **LADBS** enforces structural and safety requirements but does not evaluate land-use compatibility or RV-specific health and safety conditions.
- **CPC** evaluates land-use entitlements but is not coordinating with LADBS or HCD on the project's compliance with the specialized state regulations governing RV parks.
- **HCD**, which has exclusive state authority over RV park health and safety standards, has not been formally incorporated into the City's ministerial review process.

This fragmentation results in **no unified review, no integrated safety assessment, and no assurance the project complies with required state standards**. A project cannot be considered “lawfully created” when the agencies responsible for enforcing the law are not communicating, not sharing information, and not conducting coordinated oversight.

A **CUP is the only mechanism** that requires inter-departmental review, public input, and enforceable conditions to ensure compliance with all governing laws.

THE LAMC FRAMEWORK FOR RV PARKS CONFLICTS WITH STATE HEALTH & SAFETY CODE REQUIREMENTS

California’s **Health and Safety Code** (particularly sections governing Special Occupancy Parks and RV parks) sets forth detailed, mandatory standards for: (1) Fire safety clearances; (2) Minimum spacing between RV sites; (3) Sanitation infrastructure; (4) Sewage disposal; (5) Electrical systems; (6) Emergency access; and (7) Resident and operator safety.

As stated in the neighborhood’s initial appeal, the LAMC does **not** incorporate or reference state-mandated standards within §14.00 A.7 such as a CUP, and now recently discovered Title 24 & 25. As written, the LAMC allows ministerial approval without ensuring compliance with state law, creating a direct **regulatory conflict**.

A project cannot be “lawfully created” under the LAMC if the municipal code itself operates in a manner that fails to incorporate — and in some cases contradicts — the mandatory state Health and Safety Code requirements.

Because state law supersedes local ordinances when health and safety are at issue, a discretionary **CUP** is legally required to reconcile these conflicts and ensure compliance.

SERIOUS HEALTH AND SAFETY RISKS

There are serious **health and safety issues** associated with RV parks. The specific risks are related to fire safety, sanitation, environmental impacts, and community welfare. These issues are not adequately addressed through this ministerial process.

A CUP is the appropriate—and legally required—mechanism to ensure proper environmental review, public input, and the imposition of enforceable conditions to mitigate these risks.

CONCLUSION

The applicant has not established that the project is **lawfully created**, has failed multiple mandatory performance standards under LAMC §14.00 A.7, has failed to comply with applicable Health and Safety Codes, and therefore cannot be processed

ministerially. Under the clear language of the code, a **Conditional Use Permit is required.**

I respectfully urge the Council to uphold the ordinance, protect public health and safety, and require a CUP for this project.

Communication from Public

Name: Christal Cooper

Date Submitted: 11/30/2025 09:07 AM

Council File No: 24-0711-S2

Comments for Public Posting: The approved plans contain zero notation that this is a self-contained-only park. Under Title 25 §1002, the park is therefore legally presumed to contain 46 dependent spaces requiring full restroom, shower, and laundry buildings which are completely missing. The ministerial permit is void

I submitted correspondence regarding a serious state-law compliance defect in the approved plan set for 23416 S. President Avenue, currently before the City Council under CF 24-0711-S1 and S2. I am writing now to supplement that submission with newly referenced evidence confirming that all agencies reviewed and approved an incomplete plan set that omitted mandatory Title 25 Special Occupancy Park facilities.

The plans approved by LADBS and transmitted through CPC do not show any of the required restroom, shower, laundry, or service buildings mandated under 25 CCR §§1524, 1530, 1532, 2005, and 2106. These facilities—and the accessible routes to them—are required for every Special Occupancy Park containing dependent spaces. The approved plans contain no notation restricting all spaces to independent/self-contained units, and under 25 CCR §1002, the spaces must therefore be treated as dependent, triggering the full sanitary and service-building requirements.

Critically, the HCD Local Approvals / Government Agency Approval Form (HCD MP-514) included in the plan set confirms that the applicant submitted the same plan sheets to HCD *exactly* as submitted to LADBS and CPC—with no required facilities shown anywhere. HCD's receipt acknowledgment does not validate the omission; it simply confirms that HCD was notified. This establishes that the applicant presented an incomplete plan set to every reviewing agency, and that the project was approved without the state-mandated service buildings required for a Special Occupancy Park.

Because these required facilities are entirely absent, the plan set was incomplete at the time of approval, and the permit appears to have been issued in error under LAMC §91.106.4 and subject to revocation under LAMC §98.0805. Further, "Stage 2" construction does not cure state-law violations, and the missing buildings cannot legally be added through a plan correction under LAMC §91.106.3. Constructing the required facilities now would constitute new work, requiring new discretionary review, ADA/Title 24 access analysis, CEQA review, and public hearings.

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I have also referred these materials to the California Department of Housing and Community Development (HCD) – Codes & Standards Enforcement Unit. Because the approved plan sets omit every mandatory sanitary and service building required under Title 25, I have requested that HCD review the plans submitted through the HCD MP-514 Local Approvals Form and determine whether these parks were approved on incomplete plan sets in violation of 25 CCR §§1524, 1530, 1532, 2005, and 2106. If confirmed, HCD has authority to open enforcement cases, issue Orders to Comply, and prohibit occupancy under Health & Safety Code §18865 until all required facilities are constructed, inspected, and approved. HCD's involvement is

necessary to ensure compliance with state Special Occupancy Park requirements and to prevent further reliance on incomplete or non-conforming plan sets.

Given the seriousness of these defects, I respectfully request that LADBS and City Planning immediately advise the City Council that the approval was based on an incomplete plan set missing all state-mandated facilities, and that the project cannot lawfully continue under ministerial processing.

Thank you for your prompt attention to this matter.

Communication from Public

Name: pIERRE

Date Submitted: 11/30/2025 03:02 PM

Council File No: 24-0711-S2

Comments for Public Posting: I have owned a house in Greenmeadows West since 1999. The Silver RV park is oversized, It should not allow 46 RVs and up to 7-8 people per RV on a small lot that would only fit 6 single family houses on it. There is no planned green space on the lot, no greenery at all, just a paved lot with electrical and sewer dumps. The RVs will be too close together (fire hazard), Silver RV will allow anything to come in, even if the RV is over 10 years that don't drive which in any other RV park, it is required to be to a standard that THE RV IS IN GOOD WORKING ORDER. Their vehicles should be operable, cleared of all safety hazards and they must have proof of ownership not just drag in a worn down RV, which Silver currently allows. I just don't understand how Silver RV as failed in so many ways, it's just not fair to the people of the neighborhood or the people that will live there. The Pathway Home RV Interim Housing Pilot Program at a Crenshaw parking, they say they only have room for 14 Rv's with up to 20 persons in an 1.6 ACRE area . The program uses the lot to provide a safe and structured environment for unhoused individuals living in RVs, connecting them with services and helping them find permanent housing. They have recognized that a RV is not a permanent home, it is a stepping stone to get them in a more permanent home. Silver RV park is stuffing as many RV's as possible in a tiny space in a quiet neighborhood, for profit not helping to provide low income housing, but to squeeze in as many as he can to one space to make PROFIT. With only one security guard with no training or certificate of training. There are a few Tuff sheds on the property for storage, however there are no provided showers, bathrooms, laundry locations or extra parking on the lot. The past requirements were not followed, so if he was to be required to follow another Conditional Use Permit (CUP) required for the proposed RV Park project. Are you going to uphold the requirements or will we be in the same boat again? Mr. Silver has a track record of poor conditions and failed to provide clean housing. Please require them to have a CUP and please reduce the number of RV's and people that can live in that space. Overcrowding will not be safe for anyone in or out of the RV housing location. The criteria to obtain a Public Benefit Project permit related to recreational vehicle parks is just 12 performance standards is not enough to allow a commercial business to be

inserted into a residential neighborhood without a Conditional Use Permit and public hearing(s) for the safety of those inside and outside of the park. Regular RV parks strictly states that the RV park is for temporary stays. If the RV's can't move, does LAFD inspect to be sure that there is enough room for all other RVs to move out or evacuate without being blocked by another that cannot be moved because it is non-operational? What safety measures is the RV park responsible to provide for to ensure the safety of pedestrians walking on the sidewalk by entrance and exit driveway? The RV Park in Santa Clarita has 47 RVs, that park is over 11 ACRES (The minimum size requirement for an RV park in the A-2-5 Zone is five acres in LA County). Why is 46 Rvs allowed in 1.8 acres, someone needs to go back to the drawing board, this is not going to work.

Communication from Public

Name: Adela M Castro

Date Submitted: 11/30/2025 08:01 PM

Council File No: 24-0711-S2

Comments for Public Posting: My name is Adela M Castro and I'm an 18 year resident on President Avenue in the Green Meadows West area. I oppose the Silver RV Park project at 23416 and 23514 So President Avenue because it has not met all the required performance standards required for the project and it also raises noise, traffic and safety concerns for this neighborhood. I respectfully urge the City Council to require a Conditional Use Permit (CUP) with proper review for this RV Park project. Thank you for your attention to this important matter to our neighborhood

Communication from Public

Name: Jessica Cooley

Date Submitted: 11/30/2025 06:22 PM

Council File No: 24-0711-S2

Comments for Public Posting: I oppose the issuance of permits for the Silver RV Park because the project was built out of compliance, with structures built inside the required buffer zones. This has already required demolition of a wall, erecting of new fencing, and utility structures/garbage enclosures are still in the buffer which will need removed and redone. These issues demonstrate that the project cannot be considered ministerial and should be remanded for proper review.

Communication from Public

Name: James Alvarez

Date Submitted: 11/30/2025 06:22 PM

Council File No: 24-0711-S2

Comments for Public Posting: I oppose the issuance of permits for the Silver RV Park because the project was built out of compliance, with structures built inside the required buffer zones. This has already required demolition of a wall, erecting of new fencing, and utility structures/garbage enclosures are still in the buffer which will need removed and redone. These issues demonstrate that the project cannot be considered ministerial and should be remanded for proper review.

Communication from Public

Name: Iraida Garces

Date Submitted: 11/30/2025 06:23 PM

Council File No: 24-0711-S2

Comments for Public Posting: I oppose the issuance of permits for the Silver RV Park because the project was built out of compliance, with structures built inside the required buffer zones. This has already required demolition of a wall, erecting of new fencing, and utility structures/garbage enclosures are still in the buffer which will need removed and redone. These issues demonstrate that the project cannot be considered ministerial and should be remanded for proper review.

Communication from Public

Name: Daniel Trujillo

Date Submitted: 11/30/2025 06:25 PM

Council File No: 24-0711-S2

Comments for Public Posting: I oppose the issuance of permits for the Silver RV Park because the project was built out of compliance, with structures built inside the required buffer zones. This has already required demolition of a wall, erecting of new fencing, and utility structures/garbage enclosures are still in the buffer which will need removed and redone. These issues demonstrate that the project cannot be considered ministerial and should be remanded for proper review.

Communication from Public

Name: Manuel Frometa

Date Submitted: 11/30/2025 06:26 PM

Council File No: 24-0711-S2

Comments for Public Posting: I oppose the issuance of permits for the Silver RV Park because the project was built out of compliance, with structures built inside the required buffer zones. This has already required demolition of a wall, erecting of new fencing, and utility structures/garbage enclosures are still in the buffer which will need removed and redone. These issues demonstrate that the project cannot be considered ministerial and should be remanded for proper review.

Communication from Public

Name: Dena Ludwig

Date Submitted: 11/30/2025 11:28 PM

Council File No: 24-0711-S2

Comments for Public Posting: ICO (Interim Control Ordinance) I oppose the project because the City recently passed an Interim Control Ordinance halting RV Park permitting due to safety issues and lack of regulation. Allowing this one project to move forward despite the ICO would create inconsistent policy and jeopardize public welfare. Compliance & Safety I oppose the Silver RV Park project because the City Planning Commission found that the developer failed to comply with 3 of the 12 mandatory performance standards under LAMC 14.00 A.7. Projects that do not meet these standards are required to go through a Conditional Use Permit process with proper review. This project presents safety concerns and must not move forward without full oversight. Community Impact I oppose the issuance of permits for the Silver RV Park because the project was built out of compliance, with structures built inside the required buffer zones. This has already required demolition of a wall, erecting of new fencing, and utility structures/garbage enclosures are still in the buffer which will need removed and redone. These issues demonstrate that the project cannot be considered ministerial and should be remanded for proper review. Summary Our neighborhood deserves development that is safe, code-compliant, and properly reviewed. I oppose this RV Park project because it has not met required performance standards, raises safety concerns, and should not be approved without proper review. Thank you for your time and consideration regarding this matter.