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## Public Comments Not Uploaded Fwd: Subject:Supporting Evidence for Council Files 24-0711-S1 & 24-0711-S2 – Please Upload or Forward to Appropriate Clerk

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Office of the City Clerk <cityclerk@lacity.org>

Tue, Dec 2, 2025 at 7:54 AM

Reply-To: clerk.plumcommittee@lacity.org

To: Clerk-PLUM-Committee <clerk.plumcommittee@lacity.org>

----- Forwarded message -----

From: 'Christal Cooper' via Clerk - CityClerk <cityclerk@lacity.org>

Date: Sun, Nov 30, 2025 at 1:23 PM

Subject: Re: Subject:Supporting Evidence for Council Files 24-0711-S1 & 24-0711-S2 – Please Upload or Forward to Appropriate Clerk

To: clerk.publiccomment@lacity.org <clerk.publiccomment@lacity.org>, CityClerk@lacity.org <cityclerk@lacity.org>

Cc: Deseray Sarcona <deseray.sarcona@lacity.org>, [REDACTED], Phyllis Nathanson <phyllis.nathanson@lacity.org>, Undine Petrusis <undine.petrulis@lacity.org>

Dear Plum and City Clerk,

I am submitting the attached evidence packet for inclusion in Council File 24-0711 and Council File 24-0711-S2 for the December 2, 2025 PLUM Committee hearing regarding the Silver RV Park project.

The attachment includes Title 25 and Title 24 compliance documentation supported by photographs, website captures, permit records, and color-coded plan annotations. Because the packet contains photographs and visual documentation, it must be uploaded by Clerk staff so that Councilmembers and the public can view the images prior to the hearing. For clarity, I respectfully request that the PDF be posted in color so that the visual markers and annotations remain legible.

One-Sentence Description for the Portal:

This packet demonstrates that none of the approved plan sets for the three Silver RV parks include the mandatory Title 25 service buildings (restrooms, showers, laundry) advertised by the developer, while permanent off-plan buildings with electrical, water, and sewer lines were constructed in the field, violating 25 CCR §§1524–2106, LAMC §98.0805 ("issued in error"), and HCD SOPA Bulletin 2013-01.

Please confirm receipt and posting to Council Files 24-0711 and 24-0711-S2.

Thank you very much for your assistance.

Warm regards,  
Christal Cooper  
Harbor City Resident

[Quoted text hidden]

12/2/25, 8:29 AM

City of Los Angeles Mail - Public Comments Not Uploaded Fwd: Subject:Supporting Evidence for Council Files 24-0711-S1 & 24-07...



**Title 25 Violations.pdf**

3519K

# Title 25 Violation: Required Restroom & Laundry Buildings Built Without Plans and Misrepresented as “Tuff Sheds”

Across all three sites, required Title 25 service buildings—restrooms, showers, laundry—were built as permanent structures but labeled as “Tuff Sheds” to avoid Title 25/24, fire, and ADA review. These off-plan buildings do not appear on any approved plans, violating 25 CCR §§1524–2106, LAMC 91.106, and HCD SOPA 2013-01.

## Silver RV Park Harbor City

### Unmatched Convenience and Comfort

At Silver RV Park, we redefine the RV living experience. Enjoy the convenience of full hook-ups, free utilities, and spacious sites for a seamless stay. Our commitment to excellence extends to on-site amenities, including laundry facilities, electric security gates, and community restrooms. Experience a harmonious blend of comfort and security, creating an environment where you can truly feel at home.



## Oceans 12 RV Park

[Home](#) [Gallery](#)

### Wilmington

Bring your RV here and live in it at a brand new RV park. Come stay with us. We will rent you an RV space. We are 1/2 mile from the water and right next to Long Beach and a beautiful park. With laundry, electric in and out security gate, community restrooms and a live-in on-site manager all for \$1250/month!



Restrooms

9849 Lemona Ave. North Hills, CA 91343

## Silverland RV Park



### Public Showers + Restrooms

Rinse off, feel refreshed, and relax.





# Harbor City: Approved Plans Cite Title 24 & Title 25 – Yet Omit All Required Restroom, Shower, and Laundry Facilities

The approved plans for 23416 S. President Ave explicitly cite compliance with California Title 24 and Title 25. However, the plan set omits all mandatory restroom, shower, laundry, and service buildings required under 25 CCR §§1524, 1530, 1532, and 2106 for an RV park containing dependent spaces. No accessible routes to these facilities are shown, and no notation indicates that all spaces are independent/self-contained. Under Title 25, these facilities must be included in the submitted plan set prior to permit issuance or ministerial clearance. Their complete absence indicates the plans were reviewed and approved in violation of Special Occupancy Park requirements and warrant immediate investigation and corrective action by HCD.

23020-10000-02232	B23LA21368	Nonbldg-New	Permit Closed 8/28/2024	USE OF LAND FOR NEW RECREATION VEHICLE PARK FOR PUBLIC BENEFIT PROJECT PER LAMC 14.00A7.
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Project is compliant with all applicable Performance Standards,  
Codes and Regulations set forth by:  
City of Los Angeles Planning Dept, Public Benefits Project  
City of Los Angeles Fire Department  
State of California Dept of Housing and Community Development/  
Special Occupancy/RV Park  
State of California Health and Safety Code  
State of California Code of Regulations, Title 24  
Building Code & Energy Efficiency Standards  
State of California Code of Regulations, Title 25  
Division I, Chapter 2  
All Requirements of Utility Providers to establish service

existing 8' Concrete block wall

Project is compliant with all Performance Standards,  
Codes and Regulations set forth by:  
City of Los Angeles Planning Dept, Public Benefits Project  
City of Los Angeles Fire Department  
State of California Dept of Housing and Community Development/  
Special Occupancy/RV Park  
State of California Health and Safety Code  
State of California Code of Regulations, Title 24  
Building Code & Energy Efficiency Standards  
State of California Code of Regulations, Title 25  
Division I, Chapter 2  
All Requirements of Utility Providers to establish service



DRAWINGS PROVIDED BY:  
DOUG ROSS  
1025 MCFARLAND AVE  
WILMINGTON, CA 90744  
424-533-2936

**PLANS APPROVED**  
City of Los Angeles  
Department of City Planning

DATE: 08/01/2024 PAGE NO. 1 of 3  
EIND: 24020-10000-00085  
R/NO: N/A  
FROM: Ruben Vasquez  
TO: Supplemental Permit to 23020-10000-02232

DATE:  
1/7/2024

SCALE: 1/16" = 1'

SHEET:  
P-1

SILVER RV  
4712 ADI

DRAWINGS PROVIDED BY:  
DOUG ROSS  
1025 MCFARLAND AVE  
WILMINGTON, CA 90744  
424-533-2936

DATE:  
7/25/2024

SCALE: 1/16" = 1'

SHEET:  
P-1

# Wilmington RV Park: Approved as a 47-Space Special Occupancy Park With No Service Buildings

The LADBS permit record for 1550 E. L Street, Wilmington (12/14/2021 – Quality Review Completed) explicitly identifies the project as a “new 47-space mobile home park with no structures.”

Under 25 CCR §§1002, 1524, 1530, 1532, 2005, and 2106, a Special Occupancy Park containing dependent spaces must include restrooms, showers, laundry facilities, slop sinks, and accessible routes in the initial plan set.

The Wilmington approval contained none of the required Title 25 service buildings, yet the site is already occupied.

This document provides direct evidence that the park was approved and operated in violation of mandatory Special Occupancy Park requirements and warrants immediate HCD enforcement.

1550 E L ST 90744

Application/Permit #	PC/Job #	Type	Status	Work Description
21026-10002-00352	X23LA06425	Bldg-Alter/Repair	Permit Finaled 6/22/2023	SUPPLEMENTAL TO 21026 30001 00352 TO UPDATE OWNERSHIP
21010-30000-05424	B21WL04542	Bldg-New	PC Approved 5/27/2022	****VOID**** Accessory Building *** 1 of 4 *** (combined fees 4 applications)
21010-30000-05426	B21WL04542	Bldg-New	PC Approved 5/27/2022	****VOID**** Accessory Building *** 2 of 4 *** (combined fees 4 applications)
21010-30000-05427	B21WL04542	Bldg-New	PC Approved 5/27/2022	****VOID**** Accessory Building *** 3 of 4 *** (combined fees 4 applications)
21041-90000-36716	--	Electrical	Permit Closed 5/23/2023	Providing an temp electrical power pole
21010-30001-05427	B21WL05169	Nonbldg-Alter/Repair	Quality Review Completed 12/14/2021	****Plan Check Only**** *** Attn: Vladimir *** supplemental ref to pcis # 21010-30000-00352, for development of a new 47 space mobile home park with no structures. need a land use change- no building structure on site.
21026-30000-00352	B21WL04542	Nonbldg-Alter/Repair	Permit Finaled 5/22/2023	Use of Land for New Recreation Vehicle Park for Public Benefit Project per LAMC 14.00A7
21026-30001-00352	B22WL02969	Nonbldg-New	CofO Corrected 6/23/2023	Supplemental permit to # 21026-30000-00352 to change the application type to "Nonbldg-New" and capture Use of Land C of O fee.



# North Hills: 45-Space Special Occupancy Park Approved as 'Use of Land Only' With Zero Structures

9849 N LEMONA AVE				
+ Parcel Profile Report:				1
- Permit Information found:				3
- 9845-9849 N LEMONA AVE 91343				
Application/Permit #	PC/Job #	Type	Status	Work Description
24020-10001-01020	B25LA39431	Nonbldg-New	Quality Review Completed 10/17/2025	SUPPLEMENTAL TO PERMIT 24020-10000-01020 TO REMOVE TRASH ENCLOSURE AND REVISE THE WORK DESCRIPTION TO "USE OF LAND PERMIT FOR RV PARK WITH ADA PARKING UNDER PUBLIC BENEFIT PROGRAM PER LAMC 14.00.A.7. AND SPECIAL OCCUPANCY PARK ACT. CEQA EXEMP " AND TO REVISE TRASH ENCLOSURE.
24020-10000-01020	B24LA11631	Nonbldg-New	Intent to Revoke 9/18/2025	USE OF LAND PERMIT FOR RV PARK MOBILE HOME PARK WITH ADA PARKING /PUBLIC BENEFIT PROJECT PER LAMC 14.00.A.7

Multiple LADBS permit records for 9845–9849 and 9849–9855 N. Lemona Ave show approvals for a 45-space RV/mobile home park processed solely as a “Use of Land for (N) Mobile Home Park / Public Benefit Project per LAMC 14.00 A.7.”

These permits include no structures and no service-building approvals of any kind. No restrooms, no showers, no laundry facilities, and no sanitation or service buildings required under 25 CCR §§1524, 1530, 1532, 2005, and 2106 appear anywhere in the plan history.

Because the plan sets contain no notation restricting all spaces to independent/self-contained units, the park must be treated as containing dependent spaces under 25 CCR §1002, triggering mandatory service-building requirements.

The permit records therefore demonstrate that the North Hills RV park was approved and constructed without the required Title 25 service facilities, warranting immediate HCD investigation and enforcement.

- 9849 N LEMONA AVE 91343				
Application/Permit #	PC/Job #	Type	Status	Work Description
23016-90000-12593	--	Bldg-Alter/Repair	Issued 4/21/2023	Re-roof with Class A or B roof covering material weighing less than 6 pounds per sq. ft. over existing solid sheathing 45 Squares. Class A roof covering is required within Very High Fire Hazard Severity Zone (VHFHSZ). For residential roof replacement > 50% of the total roof area, apply Cool Roof Product labeled and certified by Cool Roof Rating Council (CRRC). Cool Roof may be required for non-residential buildings per Title 24, Part 6, Section 141.0(b)2B.
24041-90000-47703	--	Electrical	Permit Closed 8/22/2025	200amp temporary power pole TEMP 1
24041-90000-47704	--	Electrical	Permit Closed 10/2/2025	200amp temporary power pole TEMP 2
23020-20000-02462	B23VN17377	Nonbldg-New	Quality Review Completed 1/12/2024	USE OF LAND FOR (N) MOBILE HOME PARK/PUBLIC BENEFIT PROJECT PER LAMC 14.00.A.7
25042-90000-07959	--	Plumbing	Issued 4/24/2025	upgrade water line
25042-30001-07959	X25WL04015	Plumbing	Issued 5/15/2025	SUPPLEMENTAL TO PERMIT 25042-90000-07959 TO CHANGE WORK DESCRIPTION TO READ, INCREASING WATER LINE TO 2".

- 9849-9855 N LEMONA AVE 91343				
Application/Permit #	PC/Job #	Type	Status	Work Description
23016-90000-12593	--	Bldg-Alter/Repair	Issued 4/21/2023	Re-roof with Class A or B roof covering material weighing less than 6 pounds per sq. ft. over existing solid sheathing 45 Squares. Class A roof covering is required within Very High Fire Hazard Severity Zone (VHFHSZ). For residential roof replacement > 50% of the total roof area, apply Cool Roof Product labeled and certified by Cool Roof Rating Council (CRRC). Cool Roof may be required for non-residential buildings per Title 24, Part 6, Section 141.0(b)2B.
24041-90000-47703	--	Electrical	Permit Closed 8/22/2025	200amp temporary power pole TEMP 1
24041-90000-47704	--	Electrical	Permit Closed 10/2/2025	200amp temporary power pole TEMP 2
23020-20000-02462	B23VN17377	Nonbldg-New	Quality Review Completed 1/12/2024	USE OF LAND FOR (N) MOBILE HOME PARK/PUBLIC BENEFIT PROJECT PER LAMC 14.00.A.7
25042-90000-07959	--	Plumbing	Issued 4/24/2025	upgrade water line
25042-30001-07959	X25WL04015	Plumbing	Issued 5/15/2025	SUPPLEMENTAL TO PERMIT 25042-90000-07959 TO CHANGE WORK DESCRIPTION TO READ, INCREASING WATER LINE TO 2".