



Public Comments Not Uploaded Re: Subject: Public Comment Submission for PLUM Committee – Council File 24-0711-S2

1 message

'Christal Cooper' via Clerk-PLUM-Committee <clerk.plumcommittee@lacity.org>

Thu, Nov 13, 2025 at 5:54 AM

Reply-To: clerk.plumcommittee@lacity.org

To: "clerk.plumcommittee@lacity.org" <clerk.plumcommittee@lacity.org>

Cc:

Dear PLUM Committee Clerk,

I am submitting the attached document for inclusion in the official record for the upcoming Planning and Land Use Management (PLUM) Committee meeting regarding **Council File 24-0711-S2** ([23416 S. President Avenue, Harbor City](#)).

The attached PDF contains my written public comment, including essential questions, documented safety concerns, and photographic evidence of noncompliance related to the proposed RV park project. I respectfully request that this document be circulated to Committee members and posted to the Council File prior to the hearing.

Please confirm receipt at your earliest convenience.

Thank you for your time and for ensuring that community concerns are reflected in the public record.

Sincerely,
Christal Cooper
Harbor City Resident

On Wednesday, November 12, 2025 at 04:33:11 PM PST, clerk.plumcommittee@lacity.org <clerk.plumcommittee@lacity.org> wrote:

Good afternoon,

Please find the attached Notice of Public Hearing.

Case No. DIR-2024-7352-BSA-1A

Project Address: 23416 and 23514 South President Avenue

Hearing Date: 11/17/2025

Council file No. [24-0711-S2](#)

Thank you,

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Planning and Land Use Management Committee Clerk Team

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Plum November (1).pdf

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Public Safety and Procedural Integrity Focus

How can the City move forward with occupancy or approvals for the RV park at 23416 S. President Avenue when core issues, traffic safety, infrastructure capacity, zoning compliance, and departmental accountability, remain unresolved?

These concerns are organized into five key areas of focus, each framed by an essential question that highlights a core issue requiring PLUM's oversight.

1. How can LADBS justify extending a “public utility” exemption under LAMC §12.22 A.2 to a private, for-profit RV park; effectively creating a carve-out that contradicts both the City Planning Commission’s determination under §14.00 A.7(a)(5) and the original intent of the Municipal Code to reserve such allowances for public-serving infrastructure?
2. How did LADBS approve P-4, introducing utility islands and an 800-amp electrical system in the buffer, without resubmitting the plan to City Planning for clearance, especially after the site had already been flagged for noncompliance in April 2024?
3. If Planning states the number of RV spaces is “not within their area” and LADBS claims the number is “not enforceable,” who ensures the project adheres to its approved 46-space configuration? Without departmental oversight, what prevents the developer from expanding to 75 or even 100 spaces, especially when no agency has claimed authority to limit or verify the actual RV count?
4. How can this project continue to qualify as a *Public Benefit* when multiple Performance Standards (#3, #4, #5, #9) have been violated, standards that are mandatory under LAMC §14.00 A.7?
5. How can the City justify approving a 46–55-space RV park, representing a 13% increase in total traffic volume, within a 423-home residential enclave that has no traffic lights at its only entry points and no prior traffic-impact analysis?

Area of Focus #1 – Discrepancy Between LADBS and CPC Regarding Utility Islands and Electrical Infrastructure:

The October 31, 2025 LADBS report incorrectly interprets LAMC §12.22 A.2 to permit installation of private utility islands and an 800-amp electrical system (approximately 36 ft × 24 ft) within the site’s rear landscaped buffer, claiming they qualify as “structures for public-utility purposes.” This interpretation fundamentally distorts the intent of the provision, which was designed to allow installations by regulated public-utility agencies, such as the Los Angeles Department of Water and Power or SoCal Gas, not to provide exemptions for private, commercial developments.

By reclassifying private RV park infrastructure as “public utility” equipment, LADBS effectively overrides City Planning Commission (CPC) determinations under LAMC §14.00 A.7(a)(5), which clearly states that required 10-foot landscaped buffers must remain “free of all structures, paving, and utility infrastructure.” The CPC Recommendation Report (page 14) further affirms that electrical plans inconsistent with Planning clearances **“would not be allowed.”**

Area of Focus #2 – Plan Conflicts and Oversight Failures

LADBS approved conflicting plan sheets: P-1, reviewed and cleared by City Planning showing a compliant 10-foot landscaped buffer, and P-4, which LADBS later approved independently, adding utility islands and an 800-amp electrical system within that same buffer, an explicit violation of Performance Standard #5 under LAMC §14.00 A.7(a)(5). Although the project was flagged in April 2024 for a separate violation of Performance Standard #3 (Perimeter Fencing), LADBS continued issuing permits without resubmitting the revised plans to Planning for clearance. Planning never reviewed P-4, yet LADBS justified the encroachments in its October 31, 2025 report by misapplying LAMC §12.22 A.2 and treating private electrical equipment as “public-utility” infrastructure. The placement of the 800-amp electrical system also eliminated the designated ADA parking space shown on the Planning-cleared site plan, further demonstrating that LADBS approved elements outside its zoning authority and allowed construction inconsistent with Planning’s clearances and the Public Benefit Performance Standards.

Area of Focus #3– Lack of Departmental Oversight on the Number of RV Spaces

During the October 9, 2025 City Planning Commission hearing, Planning staff (Phyllis Nathanson) stated that the number of RV spaces shown on the site plan was “not within Planning’s area” and that any discrepancies between the approved 46 spaces and the community-documented 48–55 would fall under LADBS jurisdiction. However, in its October 31, 2025 report, LADBS also disclaimed responsibility, stating that the quantity of RV stalls is “not enforceable by LADBS” and that the layout on the plan was “*diagrammatic only*.”

This leaves no City department actively verifying or limiting the actual number of RV spaces constructed, despite the site’s constrained access and zoning conditions. Without numerical oversight, the developer could exceed the 46-space plan reviewed under LAMC §14.00 A.7, a change that would increase traffic, intensify land use, and invalidate the project’s Public Benefit status, requiring a Conditional Use Permit (CUP).

To protect procedural integrity and ensure the project matches its approved scope, I urge PLUM to direct City Planning and LADBS to conduct a joint verification of the as-built RV count and establish an enforceable limit consistent with the CPC-reviewed site plan.

Area of Focus #4 – Public Benefit Compliance

This project was approved as a Public Benefit Project under LAMC §14.00 A.7, which requires full compliance with twelve Performance Standards. Documented violations of Standards #3 (Fencing), #4 (Setback), #5 (Buffer), and #9 (Parking) means the project no longer qualifies for ministerial approval and should require a Conditional Use Permit (CUP) with a public hearing. Allowing continued operation under a Public Benefit designation undermines the integrity of the program and sets a precedent for non-compliant developments.

Area of Focus #5 - Traffic and Safety Impact Statement

The Green Meadows West enclave contains 423 homes (190 condominiums and 233 single-family residences) and has only three access points, 235th, 237th, and 240th Streets off Western Avenue, none of which have traffic lights. Adding a 48–55-space RV park represents roughly a **13% increase in total vehicular volume** entering and exiting this small residential grid. Each RV is up to 40 feet long, requiring wider turning radii and longer merge times on already congested corridors.

LAPD records document **38 reported traffic collisions** along Western Avenue between 235th and 240th Streets, the only access routes to the neighborhood. Several incidents occurred directly adjacent to the President Avenue entrance, including multi-vehicle collisions that required emergency response and vehicle extractions. The most recent accident, in June 2024, severely damaged multiple vehicles and blocked both lanes of traffic.

Without a **comprehensive traffic and safety impact study**, it remains unclear how additional oversized vehicle traffic from the RV park will affect congestion, pedestrian safety, or emergency response times for existing residents. The data clearly show that the area's current infrastructure cannot safely accommodate the proposed increase in large vehicle movements.

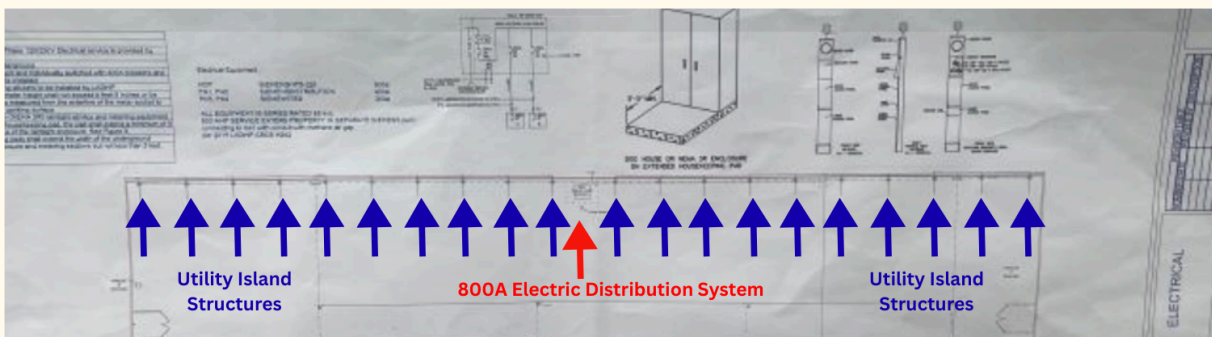
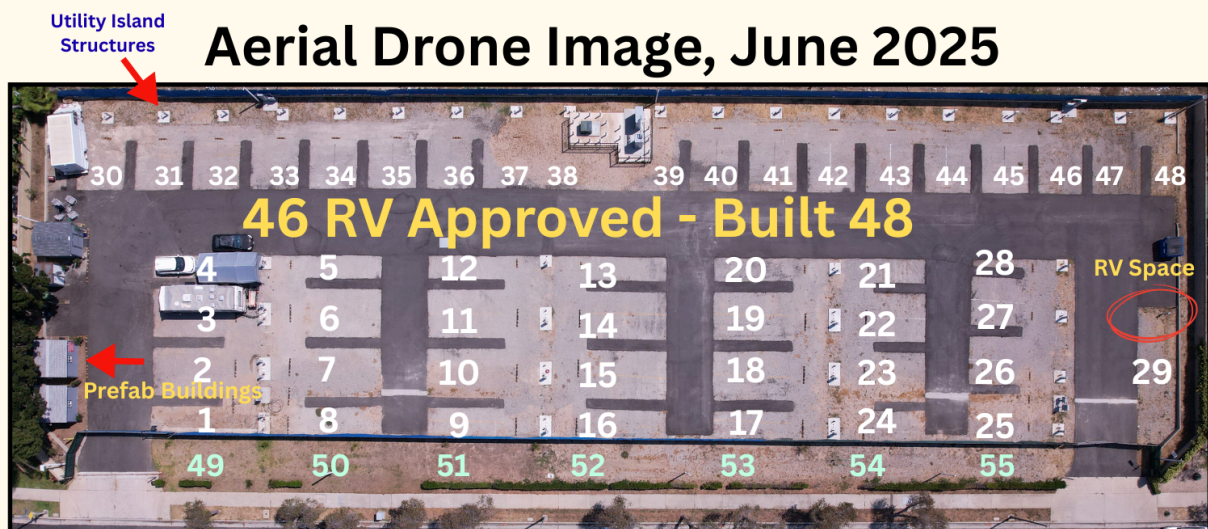
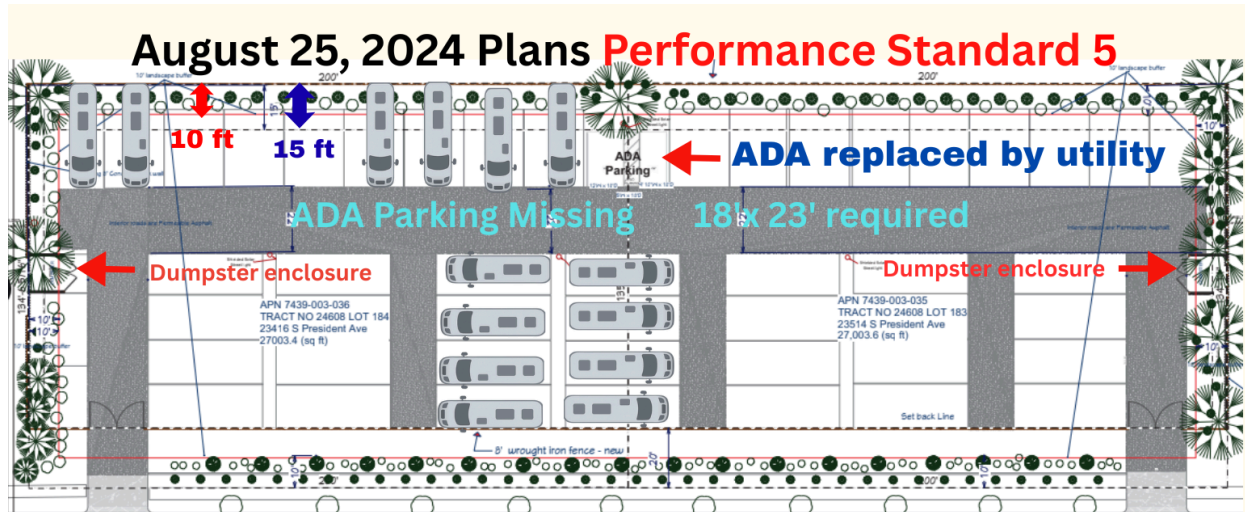
Closing Statement

Taken together, these issues demonstrate that the project at 23416 S. President Avenue was approved through a series of procedural and interpretive errors that conflict with LAMC §14.00 A.7 and compromise public safety, transparency, and environmental integrity. I urge the PLUM Committee to reaffirm the CPC's findings, direct LADBS to revise its October 31 report, and require a full compliance review before any further permits or occupancy are granted.

Thank you for your time. Attached below are images that clearly demonstrate the site's continued noncompliance with several Performance Standards.

Christal Cooper
Green Meadows Resident

Essential Question 1 and 2: The photos show the conflict between LADBS and CPC regarding the utility islands, 800-amp electrical system, removal of ADA parking, and structures placed inside the required landscaped buffer, violating Performance Standard #5, as well as the plan conflict between the Planning-cleared P-1 site plan and the unreviewed P-4 electrical plan.

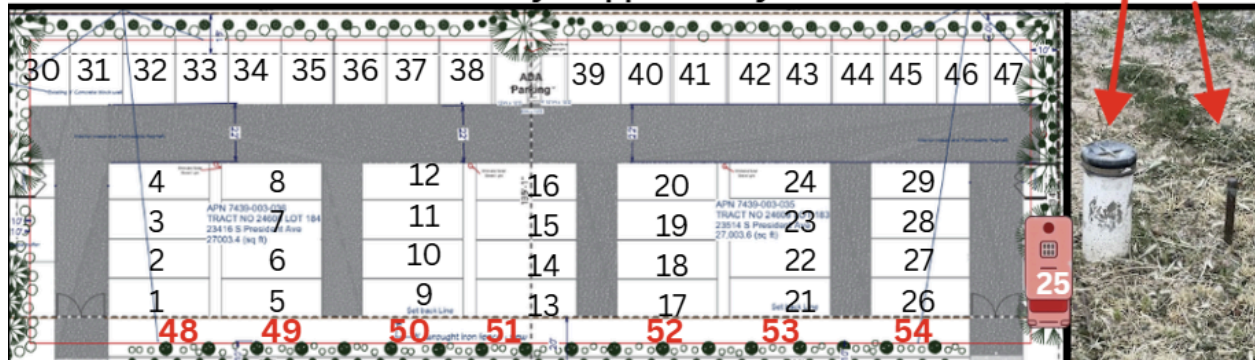


This image from Sheet P-4 shows utility pedestals (small boxes) lined along the rear fence, providing hookups to each RV. These are built within the 15-foot setback and 10-foot buffer required by **Performance Standard #5**. The larger box marked “800A” is the Electric Distribution System, which also encroaches into the buffer and occupies the ADA parking space shown on Sheet P-1. This layout replaces required landscaping and ADA access with infrastructure, a clear zoning violation

Essential Question 3: Approved for 46 RV spaces on the plans, but the site is visibly configured for 54. The image of the front buffer shows rough-ins for additional utility islands, indicating preparation for RV parking within the required 20-foot setback, mirroring the same pattern of buffer encroachment seen at the Wilmington site.

Plans: 7/25/24: Built with the intention of installing 54 RVs Not 46 RVs / No RV stall Measurements yet approved by LADBS

front of the property
in the 20ft buffer



Essential Question 4: The photos show a series of clear violations: the rear property line is enclosed with chain-link fencing, which violates Performance Standard #3 requiring a solid, view-obscuring fence; the rear setback, required to be 20 feet, measures only 17.3 feet and is visibly uneven rather than maintaining a straight, consistent line; and the 10-foot landscaped buffer required under Performance Standard #5 contains multiple prohibited installations, including utility islands, the 800-amp electrical system, and three unpermitted prefabricated structures placed directly within the buffer area. These conditions also impact Performance Standard #9, as improper use of the buffer and reduced setbacks affect circulation and parking layout.



3 Unpermitted Prefab Structures / Located in 10ft buffer

Essential Question 5: Why is a Traffic and Safety Impact Study necessary?

Increasing the **traffic volume by 13%**, the June 2024 collision at Western Avenue and 235th Street illustrates the severity of existing safety risks. In this incident, an SUV jumped the curb and narrowly avoided striking Unit A of the adjacent condominiums. A mother and child had just exited the silver vehicle that was struck, and the black vehicle involved had been hit four separate times along this same corridor. These repeated collisions demonstrate that Western Avenue already experiences dangerous traffic conditions, and adding 48–55 oversized RVs without a traffic and safety impact study would significantly increase hazards for residents, pedestrians, and emergency responders.

