

## Communication from Public

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**Council File No:** 24-1005-S1

**Comments for Public Posting:** An ICO must include specific legislative findings that there is a "current and immediate threat" to the public's health, safety, or welfare. where is that requirement met in this case?

## Comment on Emergency ICO Motion (CF 25-0843)

You can't have it both ways.

When it suits you, the City council says RV parks are **housing** and people living in RVs in **mobilehome or RV parks** are **tenants** (RSO coverage, Tenant Anti-Harassment protections), and RV/mobilehome parks are processed **ministerially** under **LAMC §14.00(A)(7)**. But when more affluent constituents don't want low-income neighbors, suddenly RV parks "aren't a public benefit, are not housing and are a safety concern." That hypocrisy is the core of this motion.

If anyone doubts the stigma I'm calling out, look at the public record: the **June 26, 2024** Council meeting transcript, public comments on **CF 24-0711**, and either of the appeal hearing transcripts. The pattern is obvious.

This need for an ICO claims "**emergency**" and "**proliferation**"? **Two applications in two years—both ours**. That's not an emergency; it's a pretext.

Meanwhile, real families ask me **every day** when the Lemona Park will open. Yesterday it was a young couple with a 2-year-old and a 7-year-old who need to be near aging parents and work. The day before, a late-20s military vet—machinist/welder—ticketed and threatened with a tow for parking his RV off Sepulveda near Lassen, just looking for a lawful space. What should I tell them—that they don't deserve a safe, legal RV-park spot because it's unpopular on your block? Please understand that tenants in an rv park are just as much a community as any other community in the city. These parks ARE NOT encampments. tenants are required to have a background check and abide by strong rules and regulations.

**And for the record:** I live here on Lemona. Over the last year I've met with my **adjoining and adjacent neighbors**. I've built good relationships with them, and I **challenge you to find opposition from any immediate neighbor**. The loudest objections are coming from farther away; the people who actually **share a fence line** with this project aren't the ones trying to stop it.

On the stigmatizing rhetoric: when speakers drag in **daycare proximity** or **Megan's Law** to imply RV-park residents are sexual deviants, or blanket labels us as criminals, that has **no place** in this discussion. If you don't call it out at that moment, you're aligning with it by default. You're supposed to represent **all** of your constituents equally. I do **not** feel represented. Emails go unanswered. No one from the City has shown interest in our actual needs—and with this economy, our numbers will grow. Are you waiting until there are enough of us to elect someone who will listen? Because that's a real possibility as we are finding our dollar continuing to buy less food, honestly, less everything, every week. Do you not think people are looking for an option that keeps them able to feed their family and provide a home at the same time?. I will post a breakdown I did in the form of a short story comparison about that here as well. As

for things you can do today...How about showing us something better than what we are seeing, apply one standard: Treat us fairly, we are residents of Los Angeles and deserve the **same legal protections** as any other resident. That's unconditional.

I have invited discussion for over a year and have been met with silence. Meanwhile, this Council is making decisions that directly affect my life. One: **my job**—if this park doesn't open, I'm unemployed. Two: **my housing**—if I lose that job, I'm homeless.

So I'm asking you, on the record: **What is your plan** to address my needs and the needs of the many people like me who are depending on these parks to open? I've emailed every Council office and the Mayor multiple times with no response. I expected the cold shoulder from CD15—we were talked down to and insulted in our only meeting—but I did not expect silence from the rest of you.

The city council's actions are inflicting real emotional and financial harm on a developer who complied with the law, and on the families prepared to move in. If you're willing to impose that harm, you should be willing to explain how you intend to mitigate it—today. The uncertainty is crushing. You've clearly had conversations and a plan; these decisions aren't being made in a vacuum. Approve what is legal, stop the discretionary interference, and tell us how you will protect the people you're hurting. This is already causing far more than abstract "policy impacts": City actions and rhetoric have pushed a small developer toward insolvency, while dozens of families who expected President Ave to open last year—and Lemona in the coming months—remain in limbo. One councilmember has publicly cast the developer as a convenient villain; that doesn't convert compliance into wrongdoing. And disliking ordinances adopted by prior Councils does not grant license to financially ruin those who relied on those still-valid laws. It may be worth recalling that the prior Council took an objective look at this issue before codifying the ordinance.

These two parks would house **~86 families** and **cost the City nothing**—near schools, jobs, transit, and groceries. Saying they're not a public benefit only proves who's being listened to. Maybe being **the highest-paid city council in the country** makes it harder to see/understand the need up close—but it's there. Your actions, as well as inactions, make it very obvious you are not paying attention; just listen to the rhetoric that's been tolerated. This was never about "compliance." The loudest voices have said the quiet part out loud: **low-income people just don't belong in their neighborhood**, with the neighborhood council even suggesting the President Ave site be turned into a **dog park** "to benefit them." Frankly, that's elitist and morally bankrupt.

Maybe Lemona should be a dog park too? That's how it feels when decisions are made **without** spending ten minutes to meet the people that your decisions will disproportionately have a negative impact on. ignoring their right to have safe affordable housing that works for them.

But still, you cannot have it both ways. If RV-park residents are "tenants" for your protections, we're tenants for your **land-use** decisions too. Drop this emergency ICO, stop the discriminatory interference, and direct staff to finish the **ministerial approvals** the valid city ordinance required us to meet. Let families live—without stigma, without double standards, and without City-engineered roadblocks built to satisfy a few loud voices at everyone else's expense.

If you push forward anyway, **follow the law**:

- An **emergency ICO** requires **real, evidence-based health/safety findings**—not neighborhood discomfort.
- It **cannot be retroactive**. You can't use it to undo ministerial approvals, vested rights, or to "close out"/withhold supplements already earned under **objective** standards.
- Targeting **§14.00(A)(7)** (which also covers **mobilehome parks**, undeniably **housing**) raises **SB 330** issues.
- Your LADBS **Stop-Work/Intent-to-Revoke** at Lemona were asserted on **Title 25/SOPA** ground where **HCD**, not the City, holds enforcement authority. I would also recommend learning what the preemptive authority HCD has over RV and mobile home parks, what that means and how it affects issues like this. HCD Informational Bulletin 2008-10 is a good place to start. Understanding that underscores that the issuance of this SWO is being driven by political motives and nothing else. It also pretty much makes the involvement of the city and LADBS a purely administrative task to process the ministerial land use permit. I may be over simplifying it but not by much..

Thank you for at least taking the time to read this...Doug

I would also say I can see the city doesn't need housing that doesn't cost them anything. Because you all are doing a fantastic job on affordable housing.

The City's on a ~17–23k permits/year trajectory vs. a ~57k/year RHNA pace. That's ~30–40% of what's needed to be on track by 2029

PSH build costs average ~\$635k per unit with other notable projects much higher.