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## Fwd: Council File 22-0617

1 message

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Office of the City Clerk <cityclerk@lacity.org>  
To: City Clerk Council and Public Services <clerk.cps@lacity.org>

Thu, Mar 16, 2023 at 7:19 AM

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

From: **Ernesto Hidalgo** <ehidalgo@lawcnetwork.org>  
Date: Wed, Mar 15, 2023 at 7:58 PM  
Subject: Council File 22-0617  
To: [CityClerk@lacity.org](mailto:CityClerk@lacity.org) <[CityClerk@lacity.org](mailto:CityClerk@lacity.org)>  
Cc: Anahi Cruz <[anahi@garmentworkercenter.org](mailto:anahi@garmentworkercenter.org)>

The online public comment form was not working after multiple attempts to press the "submit" button. The submittal for Council File 22-0617 is as follows:

Name: LA Worker Center Network  
E-mail: [ehidalgo@lawcnetwork.org](mailto:ehidalgo@lawcnetwork.org)

Comments for Public Posting:  
Dear Councilmembers:

The LA Worker Center Network ("LAWCN") supports the Garment Worker Center ("GWC") proposed amendments to the DTLA 2040 Community Plan ("DTLA 2040") to preserve, protect and incentivize this essential industry - the second largest manufacturing industry in Los Angeles, and the largest apparel producing hub in the United States, with a 130-year history in Downtown LA.

The zoning and land use changes proposed in DTLA 2040 will impact thousands of garment industry businesses and their employees within the Fashion District alone, as well as countless ancillary businesses and industries that support and work with the garment industry. Within the Fashion District, DTLA 2040 proposes a drastic shift in land use from largely manufacturing zones to primarily 'Markets' and 'Hybrid Industrial' designations, both of which pose a significant restructuring of the Fashion District's urban form and economies of scope. The consequences of these strategies on DTLA's garment industry, its estimated 20,000 jobs, the thousands of small businesses, and the Fashion District's immigrant, low-wage workers of color cannot be understated. The infiltration of market-rate housing through DTLA 2040 is of particular concern, as it will significantly raise land values within the area. By applying Market and Hybrid Industrial zoning designations over much of the Fashion District, DTLA 2040 would incentivize commercial landlords to displace garment manufacturing businesses and workers to create unaffordable, market-rate housing.

The Fashion District should be understood and celebrated as a vibrant ecosystem that provides the critical infrastructure needed to protect public health and ensure the industry's growth in sustainable production through economies of scope. This requires proximity to the largest concentration of skilled garment workers in the USA, who have on average over 21 years of experience, and affordable manufacturing and industrial spaces for fabric and garment manufacturing, assembly, finishing, warehousing, and distribution processes. L.A. leads the nation - accounting for 82.5% of California's and 83% of the USA's 'cut and sew' apparel sales. LA's

fashion industry produces an estimated \$15 billion worth of products each year, according to the California Fashion Association. The displacement of the businesses that make up this ecosystem, and the jobs they provide, will have a devastating impact on the future of the USA apparel industry and represents a huge setback to hard-fought gains for the industry at-large. LAWCN supports the solutions proposed by GWC to remedy these problems within DTLA 2040 while fostering the long-term viability of LA's unique and essential garment industry as summarized below and enumerated in LAWCN's attached Letter of Support (i.e. the "File Attachment"), and as further detailed in a letter dated February 2023 submitted to the Council File by GWC.

**PRESERVATION** of the Fashion District neighborhood as a localized urban manufacturing employment hub and ecosystem, by ensuring garment manufacturing uses remain permitted throughout the district, with no loss of the jobs or businesses that comprise the largest apparel producers in the USA. It is critical to maintain accessibility to these jobs for the workers who rely on public transportation in their commutes. Vital to ensuring these jobs persist is a built environment which allows for ease in the movement of goods and materials within and between these businesses, and dedicated, affordable manufacturing and industrial spaces for garment manufacturing, assembly, finishing, warehousing, and distribution processes.

**PROTECTION** of DTLA's garment manufacturing jobs and local ecosystem from displacement due to real estate speculation and climbing rents as a result of the introduction of new and competitive uses. within the Fashion District. LAWCN seeks the prioritization of the development of affordable housing at "Very Low", "Extremely low", and "Acutely Low" income levels within the Fashion District through strong community benefits policies and within Adaptive Reuse and Live/Work programs.

**INCENTIVIZE** - city leaders must collaborate across departments and offices to create opportunities and financing tools that attract and incentivize purpose-driven, urban manufacturing developers in order to help preserve existing, and create new, manufacturing jobs that employ local Angelenos, and equitably revitalize the industry and neighborhood.

LAWCN urges the City Council to listen to the voices of LA's workers and businesses who overwhelmingly comprise the USA garment industry, and who were essential to protecting Angelenos and Americans, while courageously providing for their families, during the COVID-19 pandemic. The Council's adoption of GWC's proposed amendments will redirect the systemic inequities garment workers face, and finally engage this historically underrepresented population in a just and equitable City planning process.

File Attachment (ATTACHED HERETO)

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 **LAWCN \_\_ Letter of Support\_ Save Garment Workers Jobs & Small Biz in DTLA.pdf**  
151K



## LOS ANGELES WORKER CENTER NETWORK

**March 15th, 2023**

Los Angeles City Hall  
200 N. Spring Street, Room 450  
Los Angeles, CA  
90012

### **Re: LA's Garment Industry and the Downtown Los Angeles 2040 Community Plan**

Dear Councilmembers,

**LA Worker Center Network** supports the Garment Worker Center amendments for the DTLA 2040 Community Plan to preserve, protect and incentivize this essential industry. The garment industry in Los Angeles is *the second largest manufacturing industry in Los Angeles and largest apparel producing hub in the United States, with a history in Downtown LA going back over 130 years.*

The **DTLA 2040 Community Plan** and the zoning and land use changes it proposes will impact thousands of garment industry businesses and their employees within the DTLA Fashion District, as well as the countless neighboring businesses & sectors that support and work with these businesses on a regular basis. Within the Fashion District, the DTLA 2040 Plan proposes a drastic shift in land use from largely manufacturing zones, to primarily 'Markets' and 'Hybrid Industrial' designations, both of which allow for a significant restructuring of the Fashion District's urban form. The consequences of these strategies on the garment sector, an estimated 20,000 jobs, thousands of small businesses, and the Fashion District's immigrant, low wage workers of color cannot be understated. The infiltration of market rate housing through the DTLA 2040 Plan is of particular concern, as it will significantly raise land values within the area. By applying Market and Hybrid Industrial zoning designations over much of the Fashion District, the DTLA 2040 Plan incentivizes commercial landlords to displace garment manufacturing businesses to create unaffordable, market-rate housing.

**The Fashion District should be understood and celebrated as a lively and growing ecosystem that provides the critical infrastructure needed to protect public health and ensure the industry's growth in sustainable production.** This requires proximity to the largest concentration of skilled garment workers in the United States, who have on average over 21 years of

experience, and affordable manufacturing and industrial spaces for fabric and garment manufacturing, assembly, finishing, warehousing, and distribution processes. LA leads domestically - accounting for 82.5% of California's and 83% of the nation's cut & sew apparel sales<sup>1</sup>. LA's fashion industry produces an estimated \$15 billion worth of products each year, according to the California Fashion Association<sup>2</sup>. The displacement of the businesses that make up this ecosystem and the jobs they provide will have a devastating impact on the future of the domestic apparel industry and would be a huge set back to these recent gains for the industry at large. **We support the solutions proposed by the Garment Worker Center to remedy these problems within the DTLA 2040 plan and to ensure the long-term viability of LA's unique and essential garment sector, outlined below and detailed in a separate letter previously submitted to the Council File by the GWC in February of 2023.**

### **Preservation**

*We demand the preservation of the Fashion District neighborhood as a localized urban manufacturing employment hub & ecosystem, by ensuring garment manufacturing uses remain permitted throughout the district, with no loss of the jobs or businesses that make up the largest apparel producing industry in the United States. It is critical to maintain accessibility to these jobs for the workers who rely on public transportation in their commutes. Vital to ensuring these jobs persist is a built environment which allows for ease in the movement of goods and materials within and between these businesses, and dedicated, affordable manufacturing and industrial spaces for garment manufacturing, assembly, finishing, warehousing, and distribution processes.*

- 1) To help curb displacement of garment jobs, create and enforce a retroactive "lookback" going back 5 years to identify if manufacturing uses have occupied a portion of any building or lot before permitting a change of use.
- 2) Identify and allocate resources to an appropriate entity to assess small business displacement risk as a result of redevelopment and support any displaced small businesses in the Fashion District when displacement cannot be prevented.
- 3) Require the preservation of freight elevators, loading docks, and loading bays within and directly surrounding buildings currently occupied by garment manufacturing businesses.
- 4) Require 1.5 FAR of manufacturing space for all new, residential and non-residential developments in mixed use areas of the Fashion District.
- 5) Identify and allocate resources to an appropriate entity to enforce FAR requirements before leasing is approved.

### **Protection**

*We demand the protection of DTLA's garment manufacturing jobs and this local ecosystem from displacement due to real estate speculation and climbing rents as a result of the introduction of new & competitive uses within the Fashion District. We seek the prioritization of the development of affordable housing at "Very Low", "Extremely low", and "Acutely Low" income levels within the Fashion District through strong community benefits agreements and within Adaptive Reuse and Live/Work programs.*

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<sup>1</sup> BizMiner, "Industry Market Report: NAICS [3152]," 2021.

<sup>2</sup> Clark, Gino. "California Style: Financing the West Coast's Apparel Industry" Sep 1 2022

<<https://www.mannpublications.com/fashionmannuscript/2022/09/01/california-style-financing-the-west-coasts-apparel-industry/>>

- 6) In the Western proposed IX2 use designation within the Fashion District, change use designation from IX2 to IX3.
- 7) Expand Planning's proposed Community Plan Implementation Overlay (CPIO) A.5 Employment Incentive Subarea in the Fashion District throughout the entire IX3 use designation, as well as IX2, IX4, and CX3 use designations within the Fashion District to promote and incentivize developers to create new light manufacturing space.
- 8) Prohibit hotels in IX2, IX3, IX4, CX3, I1, & I2 use designations within the boundaries of the Fashion District.
- 9) Affordability requirements must remain in the Downtown Adaptive Reuse provisions.
- 10) Strengthen requirements for conversion of manufacturing space into Joint Living & Work Quarters, and limit "work" uses to ensure a focus on garment manufacturing.
- 11) In IX2, IX3, + IX4 use designation areas within the Fashion District, prohibit entertainment, recreation, and stadium uses from being developed or converted from industrial uses:
- 12) Prohibit the off-site construction of affordable housing units for developments in Fashion District.

**Incentivize**

*We demand that city leaders collaborate across departments and offices to create opportunities to provide various financing tools that attract and incentivize mission-driven urban manufacturing developers in order to help preserve existing and create new manufacturing jobs downtown that employ local Angelenos, and revitalize this sector and neighborhood.*

- 13) Facilitate and support partnerships between the City's Workforce Development Board, Economic & Workforce Development Department, and proven industry-specific organizations and labor groups like Garment Worker Center to develop, pilot, and fund Los Angeles fashion manufacturing programming aimed at preserving employment opportunities, increasing economic impact and job creation, as well as uplifting and growing ethical and sustainable garment manufacturing jobs for garment workers in Los Angeles.
- 14) Facilitate links with established retail banks, community development financial institutions, and credit unions, and federal and local funding opportunities which create access to capital to drive recovery for the garment industry.

At this time, we ask that the voices of the workforce and the very businesses that actually define and characterize the area triumph. This land use proposal is an important opportunity to redirect the systemic inequities garment workers face and engage this historically underrepresented population in the planning process. We urge you to do right by the community of garment workers and small businesses who were essential in protecting us from the onset of the pandemic.

**Sincerely,**

**Ernesto Hidalgo**  
**Policy Director**  
**LAWCN**