

## Communication from Public

**Name:** Lauren Hill

**Date Submitted:** 04/18/2023 08:01 AM

**Council File No:** 22-0617

**Comments for Public Posting:** Re: LA's Garment Industry and the Downtown Los Angeles 2040 Community Plan Dear Councilmembers, I support the Garment Worker Center amendments for the DTLA 2040 Community Plan to preserve, protect and incentivize this essential industry. Please find attached my letter of support. Lauren Hill Co-founder, Population

# POPULATION

April 18, 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,

Population 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

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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/>>

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.*

- 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,

A handwritten signature in black ink, appearing to read "Lauren Hill", with a stylized, flowing script.

Lauren Hill  
Co-Founder