

Communication from Public

Name: Lindsey Cole and Ethix Merch
Date Submitted: 03/10/2023 07:46 AM
Council File No: 22-0617
Comments for Public Posting: Please see attached letter of support for DTLA garment workers. Ethix Merch is a promotional products distributor that supplies USA Made products, many of which are made by garment workers at cut-sew facilities in DTLA. We wholly support a thriving garment industry and oppose legislation that will affect the livelihoods of garment workers and the historical industry.



March 8th, 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,

Ethix Merch 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 sales¹. LA's fashion industry produces an estimated \$15 billion worth of products each year, according to the California Fashion Association². 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

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² 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/>>

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,

Lindsey Cole
Director of Marketing and Communications
Ethix Merch

Communication from Public

Name: Micah Alliance Community Development
Date Submitted: 03/10/2023 04:02 PM
Council File No: 22-0617
Comments for Public Posting: I support the LA and Garment Jobs.

March 10, 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,

Micah Alliance Community Development, Inc. 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.***

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Sincerely,

Caryb Battad
Community Development Director
Micah Alliance Community Development

Communication from Public

Name: Jillian Clark

Date Submitted: 03/10/2023 04:19 PM

Council File No: 22-0617

Comments for Public Posting: Roboro 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.



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Sincerely,

Jillian Clark
Founder, Creative Director
Roboro

Communication from Public

Name: Marili Ochoa
Date Submitted: 03/10/2023 05:01 PM
Council File No: 22-0617
Comments for Public Posting: Protect garment workers jobs in DTLA

3/10/2023

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,

Pet Modern, LLC 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.***

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Sincerely,

MARILI OCHOA
FOUNDER
PET MODERN, LLC

Communication from Public

Name: Jeanette Santillan

Date Submitted: 03/10/2023 05:15 PM

Council File No: 22-0617

Comments for Public Posting: 3/10 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, Deadly Kustoms 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. LA's fashion industry produces an estimated

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Dear Councilmembers,

Deadly Kustoms 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 sales¹. LA's fashion industry produces an estimated \$15 billion worth of products each year, according to the California Fashion Association². 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,**

¹ BizMiner, "Industry Market Report: NAICS [3152]," 2021.

² 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/>>

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,

Jeanette Santillan
Owner/Technical Designer
Deadly Kustoms

Communication from Public

Name: Coalition to Protect DTLA Garment Jobs

Date Submitted: 03/10/2023 09:59 AM

Council File No: 22-0617

Comments for Public Posting: 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. We write to you today on behalf of LA's garment workers—who are leaders of a growing alliance of local garment industry players which includes manufacturers, contractors, brands, and advocates who are dedicated to ensuring the long-term viability of our neighborhood and industry to remain the home of the largest apparel producing hub in the United States. Collectively, we agree that the DTLA 2040 plan will be devastating to the industry in the DTLA Fashion District and we ask that you support the amendments laid out in this attached letter.



March 10, 2023
Los Angeles City Hall

200 N. Spring Street
Los Angeles, CA
90012

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

Dear Councilmember Harris-Dawson and PLUM Committee members,

We write to you today on behalf of LA's garment workers—who are leaders of a growing alliance of local garment industry players which includes manufacturers, contractors, brands, and advocates who are dedicated to ensuring the long-term viability of our neighborhood and industry to remain the home of the largest apparel producing hub in the United States. Collectively, we agree that the DTLA 2040 plan will be devastating to the industry in the DTLA Fashion District and we ask that you support the amendments laid out in this letter.

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.

LA's Garment Sector: A unique & irreplaceable urban ecosystem

The DTLA Fashion District should be understood and celebrated as a lively and growing ecosystem that provides the critical infrastructure needed to 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. 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 recent gains for the local workforce and industry at large.

LA leads domestically - accounting for 82.5% of California's and 83% of the nation's cut & sew apparel sales¹. LA's fashion industry produces an estimated \$15 billion worth of products each year,

¹ BizMiner, "Industry Market Report: NAICS [3152]," 2021.

according to the California Fashion Association². The long term viability of LA's essential garment sector is crucial for the city and for the nation. This is the very same sector where garment workers and small businesses came to the rescue at the onset of the Covid-19 pandemic to pivot production and increase capacity in order to make tens of millions of masks, hospital gowns, and other PPE when global supply chains dried up. Now, just as more brands and manufacturers are bringing production back to the United States after experiencing the challenges, risks, and rising costs of producing overseas, the District's garment manufacturing tenants and their employees face an uncertain future. In order to continue to lead in such a competitive and creative industry, the city must take action through all means necessary to preserve, protect, and incentivize DTLA's garment jobs and industry.

Recommendations

Though the DTLA 2040 Community Plan has been in development since 2014, the Garment Worker Center, an organization based in the DTLA Fashion District for over 20 years, and its members only became aware of it late in the summer of 2021. After hearing from GWC and allies at the September 2021 City Planning Commission hearing, the CPC ordered the LA Department of City Planning to work with Garment Worker Center to remedy its failure to properly outreach impacted workers and business owners through focus groups, and to produce a study on the feasibility of development within the Fashion District. The **Coalition to Protect DTLA Garment Jobs** has spent the better part of 2022 educating local leaders and city planners on the importance of this workforce and industry. The product of these efforts are somewhat reflected in [Planning's September 2022 Memo to the PLUM Committee](#), which proposes amendments to the Plan, as well as [Exhibit F.2 Analysis for the Fashion Industry in Downtown](#), prepared by HR&A Advisors on behalf of the LA Department of City Planning. However, further amendments to the plan are required in order for the city to fulfill its responsibility to offer diverse and equitable opportunities for housing, jobs, transportation, education and training to all of its residents.

The LA City Planning Department's September 2022 memo includes key amendments; however further amendments are required.

We commend the Planning department staff for incorporating some recommended amendments to the plan that will support the preservation of garment manufacturing uses by distinguishing between garment manufacturing and textile manufacturing to be more permissive of garment and accessory manufacturing throughout the Fashion District. Planning has also proposed a new employment incentive area within the Fashion District under its Community Plan Implementation Overlay, to incentivize developers to create new manufacturing space. It will also limit the conversion of garment manufacturing spaces into other uses like residential or hotel uses in certain areas of the plan, while permitting conversions in other areas.

² 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/>>

We also support a hybrid “graduated inclusionary” program incorporating the Mandatory Inclusionary Housing requirements into the CPC recommended base-bonus framework for the creation of affordable housing. Extremely low-income housing is needed. Our members have already been successful in leading the work to transform the industry away from a sweatshop industry, but are still being paid wages that put their incomes between 15-30% of the AMI.

In addition to the proposed amendments offered by Planning, we have further amendments to meet our community’s goals of preserving, protecting, and incentivizing garment industry jobs in Downtown Los Angeles.

PRESERVE

The preservation of industrial uses for garment manufacturing in downtown is critical to safeguarding employment for LA’s 45,000 strong essential immigrant garment workforce and ensuring the success of the hundreds of local small businesses that make up and utilize the fashion district.

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.

We require further amendments in order to meet our demands for preservation of DTLA’s garment jobs:

1. The primary objectives of the city for the Fashion District should be to protect garment manufacturing jobs and businesses from displacement and the risk of eviction for the sake of new market-rate and luxury developments, while retaining a sufficient & diverse supply of available light industrial properties for all types of garment manufacturing business activities. To help curb displacement, 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 to another non-manufacturing use (for both new developments and conversions, where they are permitted).
2. The city should 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, including but not limited to:
 - a. Defining business displacement to include:
 - i. Businesses displaced directly as a result of redevelopment of a specific site.

- ii. Businesses displaced indirectly as a result of commercial rent increases that are not compatible with the businesses income.
 - iii. Businesses displaced as a result of a change of use for an existing parcel or property.
- b. Providing relocation advisory services by a trusted intermediary with language and cultural competency.
- c. Providing a minimum 90 days written notice to vacate prior to requiring possession.
- d. Overseeing and providing reimbursement for moving and related expenses and reestablishment expenses for eligible establishments. Determinations of business eligibility should align with existing state, and, where federal funding is involved, federal business relocation programs.
- 3. Require the preservation of freight elevators, loading docks, and loading bays within and directly surrounding buildings currently occupied by garment manufacturing businesses. For new constructions, require the above amenities in order to ensure efficient business operations for new garment manufacturing tenants.
- 4. Require 1.5 FAR for light manufacturing job productive uses in all new, residential and non-residential developments (i.e. office, commercial) throughout CX3, IX2, IX3, & IX4 use designation areas of the Fashion District.
- 5. Identify and allocate resources to an appropriate entity to enforce FAR requirements before leasing is approved. For example, in New York City, there is an Industrial Business Service Provider to oversee and ensure that FAR requirements are being met and manufacturing uses are preserved and incentivized.

PROTECT

The introduction of market rate and luxury housing along with other commercial uses like hotels within the Fashion District have already led to real estate speculation and resulted in skyrocketing rents for all of its tenants, including light industrial tenants like garment manufacturers and contractors, displacing many businesses from the Fashion District, causing some businesses to close completely, and resulting in significant job loss & displacement.

While the local sector which employs this workforce is struggling to stay put in the Fashion District, where firms have employed Angelenos for over 130 years, and around which garment workers have built their families' lives, garment workers in Los Angeles are leading the transformation of the garment industry from an antiquated sweatshop industry into a socially responsible ecosystem. They have led a successful statewide campaign that ensures the minimum wage and creates a level playing field for compliant fashion businesses with California's SB62: The Garment Worker Protection Act. They are now also active in a campaign at the national level that would expand the protections they won for garment workers in California to workers across the country. But due to decades of neglect and systemic exploitation, garment workers have been paid wages that leave them earning on average 15% to 30% of the AMI, and experience financial hardships that lead to housing instability & food insecurity, among other issues that have only worsened since the onset of the Covid-19 pandemic, and the economic upheaval of the past few years.

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.

We require further amendments in order to meet our demands for protection of DTLA's garment jobs:

6. In the Western proposed IX2 use designation within the Fashion District (South of 7th St, West of Central to Olympic and West of Stanford to the 10, North of the 10, and East of San Pedro to 12th St and East of Crocker St to 7th), change use designation from IX2 to IX3. This will protect a large concentration of existing garment manufacturing jobs and businesses from displacement by prohibiting adaptive reuse, while still allowing new developments to include a manufacturing FAR requirement. *(See Figures 1A and 1B below.)*
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.

Within this Employment Incentive Subarea:

- i. Adjust Permitted and Prohibited Applicable Uses that qualify for the incentive to:
 1. Include the following Light Industrial Uses as PERMITTED: Manufacturing, Light- Garment & Accessories, Manufacturing, Light-General, Manufacturing, Light-Artistic & Artisanal
 2. Exclude the following Manufacturing, Light uses (under Light Industrial Uses) from qualifying to meet Employment Incentive Subarea requirements: Maintenance & Repair, Wholesale Trade & Warehousing, Alcohol Beverage, Cosmetics, Food & Drink.
8. Prohibit hotels in IX2, IX3, IX4, CX3, I1, & I2 use designations within the boundaries of the Fashion District.
9. Adaptive Reuse
 - a. If the city intends to create an environment to foster the development of 20% of the city's housing growth within DTLA, and create a large stock of affordable units in order to ameliorate the city's severe housing crisis, affordability requirements must remain in the Downtown Adaptive Reuse provisions, and in its extension to a Citywide Adaptive Reuse program. The City Department of Planning proposes removing affordability requirements from Adaptive Reuse Ordinance across the city. The city's own consultants have reported (in Exhibit F.2) that due to current market conditions and construction costs, adaptive reuse poses the largest threat to displacement of the garment industry as it is likely the primary manner through which developers will create new units in DTLA. In addition to maintaining

affordability within ARO, affordability requirements must meet standards already set by other proven affordable housing programs.

10. Joint Living & Work

- a. For Joint Living & Work quarters within any IX2 and IX4 use designations within the Fashion District, require a public hearing with the City Planning Commission, appealable to City Council.
 - b. We agree with the Planning Department's required proposed findings for conversion to Joint Living/Work quarters in IX2. The Planning Department should also include a specific timeline for proving light industrial uses are not active nor viable and strong anti-displacement measures.. Extend the Planning Department's recommended amendments & our proposed strengthened requirements below for adaptive reuse conversions to Joint Living & Work Quarters in IX4 as well.
 - i. Require documentation of efforts to replace nonresidential tenants for at least 5 years from nonresidential vacancy date. Applicants should be required to provide contact information for most recent commercial tenants to allow administrator to confirm that the tenant wasn't offered money to break their lease, unjustly evicted or locked out, not offered lease renewal, subject to threats or intimidation, repeated interruptions of essential services such as heat, water, & electricity, or subject to other disruptions which caused them to leave their commercial space including failure on behalf of the landlord to repair damages or deliberate construction-related disruptions like blocked entrances, excessive dust or debris. This also should include failure to provide suitable commercial space by not ensuring consistent & effective pest control.
 - c. Limit Joint Living & Work Quarters permitted work uses in the Fashion District:
 - i. Prohibit "Office" use from qualifying as permitted uses for Joint Live/Work uses throughout Fashion District.
 - ii. Identify and allocate resources to an appropriate entity to enforce Joint Living & Work quarter workspace use requirements.
11. In IX2, IX3, + IX4 use designation areas within the Fashion District, prohibit the following uses from being developed or converted from industrial uses:
- Open Space & Recreation Uses > Indoor Recreation, Commercial & Amphitheater or Stadium, Local
- General Commercial > Entertainment Venue, Local & Regional.
12. Prohibit the off-site construction of affordable housing units for developments in Fashion District. The Draft Community Benefits Program should remove options that allow developers to meet affordable housing requirements through off-site construction or payment of a fee.

INCENTIVIZE

As the second largest creative economy in the city after Hollywood, the LA fashion industry should receive recognition and support from the city in the form of incentives (see Supplemental Exhibit 1

attached for more on the impact of LA's Fashion Creative Economy). The workers and small businesses who make up the garment manufacturing sector are committed to growing the industry ethically and sustainably. New legislation has created a level playing field for compliant businesses and growing industry interest in nearshoring point to the need for incentives to bolster this growth, but the impacts of the pandemic have left many businesses in survival mode. Now is the time to invest in this industry to move it from survival to recovery and resilience.

We demand that city leaders collaborate across departments and offices to create opportunities to provide various financing tools and partnerships 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. Funding should be available for, as examples, textile waste recycling facilities, building and block-wide improvements to remedy sweatshop conditions in garment manufacturing clusters, child care facilities, and environmental mitigations to ensure a sustainable fashion industry in Los Angeles.
 - a. Prioritize the garment industry for EIFD funds or the creation of a JEDI Zone in the Fashion District.
 - b. Establish Community Controlled Funds for Equitable Development with Governmental and Philanthropic Partners which can be used to improve infrastructure and community development projects which support this workforce and industry.

Technical Amendments:

15. Under Light Manufacturing Uses in IX3 use designation area within the Fashion District, the use document should be edited to include Manufacturing, Light as the subcategory under which Garment & Accessories fall (currently the IX3 Use document lists Garment & Accessories under Maintenance & Repair Services, which appears to be a mistake as on other Use documents it is listed under the separate subcategory of Manufacturing, Light.)
16. In IX2, IX4, and CX3 use designation areas within the Fashion District, ensure that the code reflects updates to language used to describe garment manufacturing uses wherever Joint Living & Work Quarters and Live/Work are permitted. Permitted uses should include the new category for Manufacturing, Light: "Garment & Accessories".

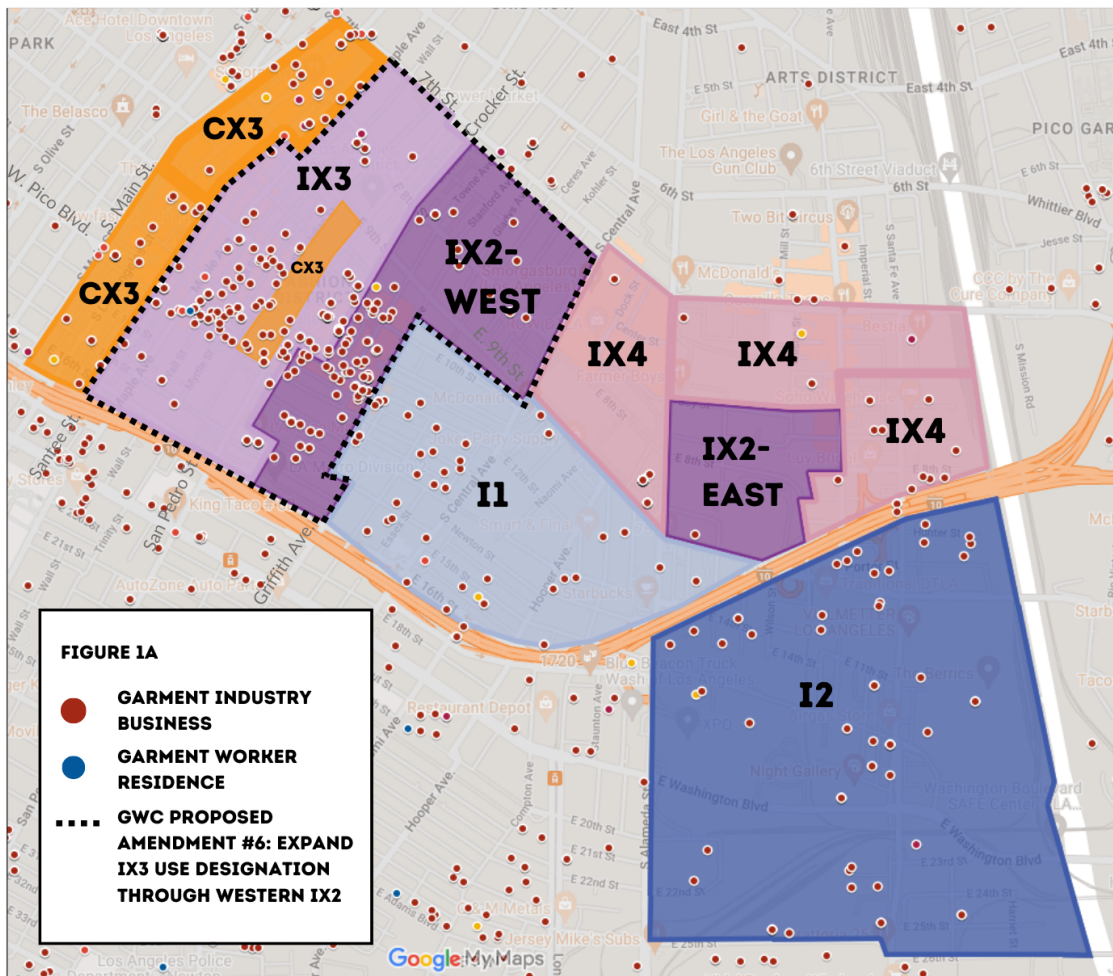
The DTLA 2040 Community Plan presents a vital opportunity to address the systemic inequities faced by historically underrepresented populations whose labor and livelihoods are inextricably woven into the fabric of downtown Los Angeles. We urge you to do right by the community of garment workers and small businesses who were essential in protecting us from the onset of the pandemic and look forward to working with you to ensure the preservation, protection, and incentivization of this essential industry. We respectfully urge you to vote in support of these amendments.

Sincerely,

Garment Worker Center

Coalition to Protect DTLA Garment Jobs

GWC DTLA 2040 Amended Community Plan Comments Figures 1A & 1B



SUPPLEMENTAL EXHIBIT 1:



Commissioned by Otis College of Art and Design

Prepared by CVL Economics

Released February 10, 2023

Data here selected and compiled by Garment Worker Center, 3/6/2023

Fashion Creative Economy Impacts in LA County & California

- Total Economic Impact* of Fashion in LA County³ :
 - 66,900 jobs
 - **Apparel Jobs: 25,726**
 - Textile & Fabrics: 4,266
 - Cosmetics: 4,648
 - Jewelry & Personal Goods: 2,362
 - Leather Goods: 2,875
 - \$4.9 Billion labor income
 - \$9.7 Billion direct gross value added
 - \$1.8 Billion tax revenue
- The number of Fashion Creative Sector jobs in California is 62,671. Direct employment in LA County's Fashion Creative Sector is 39,878⁴. For comparison, the number of Fashion Creative Sector Jobs in New York is 25,907⁵
- In 2021, California's Fashion sector directly generated \$11.3 billion in gross regional product and comprised over 62,600 jobs—an improvement following the pandemic. Indirect (business-to-business transactions) and induced (employee spending) ripple effects of the Fashion sector include supporting 120,800 jobs and generating \$20 billion in

³ OTIS 2023 Report on the Creative Economy, p.105 & 161

<<https://www.otis.edu/sites/default/files/2023%20Otis%20Report%20on%20The%20Creative%20Economy%20-%20pages%20-%20web.pdf>>

*Total Economic Impact consists of direct, indirect, and induced impacts.

⁴ Ibid, p.161

⁵ Ibid, p. 39

GRP statewide. **Nearly two-thirds of the state's Fashion sector is based in Los Angeles County.**⁶

California creative economy in general:

- For every 100 jobs in the creative sectors, an additional 281 jobs were supported in other sectors of the California economy in 2021. Each job supported by creative economy activity resulted in \$37,717 additional tax revenue, generating over \$194.1 billion in federal, state, and municipal taxes⁷.
- Regional Centers of Gravity: At over 685,000 jobs in 2021, Los Angeles County accounted for 37.4% of all jobs in the creative sectors across the state, with overwhelming employment shares in Fashion (63.6% of state jobs) and Entertainment (52.5% of state jobs)⁸.
- The creative economy is crucial to the vibrancy and strength of California's economy, directly contributing 14.9% (\$507.4 billion) of the state's \$3.4 trillion economy.

⁶ Ibid p.100

⁷ Ibid p.6

⁸ Ibid p.7

Communication from Public

Name: Daniel Cardozo

Date Submitted: 03/10/2023 12:37 PM

Council File No: 22-0617

Comments for Public Posting: As the CEO of Ethix Merch, on behalf of myself and the company, we support the Garment worker Center amendments for the DTLA 2040 Community Plan to preserve, protect and incentivize this essential industry. We are Ethix, in cooperation with national nonprofit partners and a network of ethical vendors, are working hard to connect buyers (including public universities and municipalities) with factories in Los Angeles who offer living wages and good conditions for factory workers. With the passage of the Garment Worker Protection Act (SB 62), this is now more possible than ever and it would be a shame to chase the industry away from Los Angeles after so much work has been put in. We have a great opportunity to reshore good jobs and expand the manufacturing base in Los Angeles.



March 8th, 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,

Ethix Merch 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 sales¹. LA's fashion industry produces an estimated \$15 billion worth of products each year, according to the California Fashion Association². 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

¹ BizMiner, "Industry Market Report: NAICS [3152]," 2021.

² 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/>>

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,

Daniel Cardozo
CEO and Los Angeles resident
Ethix Merch

Communication from Public

Name: Corinne Brothers
Date Submitted: 03/10/2023 03:08 PM
Council File No: 22-0617
Comments for Public Posting: Rule Design & Development supports the Garment Workers Center in protecting and perseving the vibrant Fashion District in Downtown Los Angeles.

March 8th, 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,

Rule Design & Development 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 sales¹. LA's fashion industry produces an estimated \$15 billion worth of products each year, according to the California Fashion Association². The displacement of the businesses that make up this ecosystem and the jobs

¹ BizMiner, "Industry Market Report: NAICS [3152]," 2021.

² 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.

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Sincerely,

**Corinne Brothers
Creative Director, Owner
Rule Design & Development**