



December 4, 2023

BY EMAIL

Mr. Craig Weber
Principal City Planner & Division Manager
Community Planning
Department of City Planning
200 N. Spring St
Los Angeles, CA 90012

Re: Planning and Land Use Management Committee Comments;
December 5, 2023 Meeting, Agenda Item No. 21 (Council File 23-0861);
Boyle Heights Community Plan Update: River Adjacent Industrial District

Dear Mr. Weber:

Thank you for the opportunity to comment on the draft Boyle Heights Community Plan. We want to start off by expressing overall support for the Community Plan Update, in recognition of the commendable work accomplished by the City Planning Department and Council District 14 to advance the plan. In light of the significant progress achieved to date, we write on behalf of a coalition of constituents and stakeholders in Boyle Heights to highlight opportunities for the industrial area generally bound by US 101 freeway to the north and east, the I-10 freeway to the south, and the Los Angeles River to the west.

We support certain recently proposed changes for this specific area in the November 28, 2023 Director of Planning Technical Memo to PLUM, including the introduction of a Hybrid Industrial land use designation and increased maximum floor area allowances. In order to complement and build off the Community Plan Update, this coalition is sponsoring further community outreach, master planning and design, and environmental analysis for the future of this area.

In support of this process, we are requesting that the PLUM Committee consider minor modifications to the recently proposed General Plan changes, including (1) redesignating the General Plan land use of the area along Anderson Street between 2nd Street and Mono Street from Community Center to Hybrid Industrial to accommodate existing and proposed uses; and (2) redesignating the General Plan land use of properties along Artemus Street between Mission Road and Anderson Street from Public Facilities to Hybrid Industrial to accommodate proposed disposition and adaptive reuse.

This industrial land has supported a range of activities such as goods processing, production, manufacturing, and distribution. More recently, this area has evolved to support film production and has also functioned as an incubator of local artists. It is a hub of business activity that historically has driven the economy of Boyle Heights. The City Planning Department began the process to update the Boyle Heights Community Plan in 2006, with initial background research followed by public outreach in the following decade. The Boyle Heights community has consistently voiced a growing need for initiatives to preserve job opportunities in industrial zones and address critical environmental justice issues, particularly where industrial uses and legacy industrial uses have been located along the Los Angeles River.

The City Planning Department's outreach to the community and stakeholder groups became limited due to the challenges of the COVID-19 pandemic from 2020 to 2023. As a result, identifying the community's needs and opportunities for this industrial area became more difficult, and the draft update to the Boyle Heights Community Plan, recommended for approval by the City Planning Commission on April 20, 2023, largely maintained the status quo for this industrial district, while imposing additional, prescriptive development standards. The November 28, 2023 Technical Memo proposes a Hybrid Industrial land use designation for much of the area. This small but significant update will enable the industrial district to adapt to the evolving needs of the community over time, which will help create more accessible good-paying jobs, affordable housing, and safe and inviting places for recreation so that existing constituents and stakeholders alike, can remain and thrive. The foresight embedded in the proposed Hybrid Industrial mixed-use alternative ensures adaptability to future community needs while preserving the integrity of the industrial land. By allowing additional uses to cohesively complement the existing industrial district, this approach facilitates the addition of essential elements without displacing current jobs or compromising the current use of the land.

However, the Technical Memo also proposes expanding the Community Center and Public Facilities General Plan land use designations in this area, which would have detrimental impacts on the preservation of existing and the creation of additional employment opportunities for Boyle Heights residents. While we appreciate the goals of the Community Center land use designation to support transit-oriented development in the vicinity of the Pico / Aliso light rail station, the proposed Community Center designation would render existing industrial activities nonconforming, may not fully account for existing environmental conditions, and would likely result in vacancy and blight and the loss of jobs in proximity to transit. To preserve and expand these employment-generating uses, we propose that portions of the Community Center designation be replaced with Hybrid Industrial. In general, we recommend against applying the Community Center General Plan land use designation to any parcels with existing industrial uses in this area.

Similarly, the Public Facilities General Plan land use designation is inappropriate for the City-owned facility along Artemus Street. This site, which is currently used as a storage facility by the Los Angeles Public Library, has been the subject of preliminary

disposition proceedings. Recognizing that the facility is blighted and does not currently reflect its highest and best use, the City has been exploring potential avenues to revitalize and adaptively reuse this historic structure. Assigning a Public Facilities land use designation to this site would unnecessarily constrain this promising, potentially catalytic investment without any corresponding benefit to the City.

In addition, while laudable, the change to the Hybrid Industrial General Plan land use designation alone does not go far enough to protect the community and harness the neighborhood's potential. The prescriptive development standards imposed by the proposed zoning districts are overbroad and inflexible, impeding community revitalization. Further planning complemented by rigorous outreach and sensitive processes will enable nuanced, tailored, and site-specific strategies that can generate additional employment and housing opportunities for existing residents. Therefore, this coalition of stakeholders and constituents is proposing to conduct further community outreach in support of more robust planning and land use regulations for this area. Further dialogue, building on the November 7, 2023 Community Open House co-hosted by the Department of City Planning, Council District 14, and the Boyle Heights Neighborhood Council, is vital to the planning process. The aim is to gather input and recommendations from residents, businesses, community organizations, and key stakeholders that reflect the community's aspirations and priorities.

Gathering local knowledge and community preferences will inform the preparation of a Community Protection Overlay or Specific Plan that will safeguard Boyle Heights constituents against displacement pressures. Building on the work completed by the City Planning Department, the creation of an overlay or specific plan focused on this industrial area will provide additional time and resources to engage with stakeholders to identify additional opportunities for community investment and development, including, but not limited to: job retention and growth, green and environmentally sustainable interventions in the public realm, improved neighborhood linkages connecting this area to the rest of Boyle Heights, improved river access, opportunities for additional residential, commercial, and industrial development, as well as strong protections for existing residents.

A specific plan or overlay will also help build on the existing studies done by the City Planning Department, allowing for more comprehensive analyses and in-depth studies of the industrial area. This will help facilitate intentional master planning and further environmental analysis without causing any delays in the Community Plan adoption process. These studies will also be beneficial as they serve to streamline the permitting process for implementing projects, paving the way for creating a more vibrant and interconnected community that embraces its natural surroundings connections between residents and the river-adjacent area. For example, the area may benefit from the substitution of parcel-based open space requirements into more integrated and useable public realm enhancements, including parks, community facilities, and other amenities that could be provided.

The introduction of a specific plan or zoning overlay also offers a unique opportunity for collaboration with industrial district stakeholders, including property owners. Facilitated by a development agreement or other proprietary contractual tools, guidelines and safeguards may be implemented to protect existing residents from displacement pressure. Additional local hiring and local preference policies for employment opportunities and affordable housing can be introduced, prioritizing new housing and jobs for Boyle Heights residents along with jobs and housing intensification. This includes the incorporation of affordable housing units that prioritize local residents of diverse income levels and exploring innovative models like community land trusts and social housing to ensure long-term affordability and resident empowerment. This strategic approach provides a mechanism for addressing the unique needs and priorities of Boyle Heights constituents within the broader framework of the Community Plan.

Considering these factors, we strongly encourage the City Planning Department and Council District 14 to expand the Hybrid Industrial land use designation and allow flexibility for the relaxation of prescriptive development standards and for the potential introduction of additional density pursuant to an adopted specific plan or zoning overlay. The proposed river-adjacent industrial area zoning would benefit from a more comprehensive examination of how to unlock its full potential. The implementation of a specific plan or zoning overlay will ensure that the identity, culture, and rich community history of Boyle Heights is strengthened in consideration of further outreach to constituents and stakeholders. We appreciate your time and consideration in evaluating these recommendations.

Warm Regards,



Alfred Fraijo Jr.
of SOMOS LAW GROUP

cc: Mr. Kevin De León
Mr. John S. Lee
Ms. Katy Yaroslavsky
Mr. Imelda Padilla
Ms. Heather Hutt