

Communication from Public

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Comments for Public Posting: On behalf of the Los Angeles Area Chamber of Commerce, we respectfully but firmly express our concerns regarding proposals to require a Public Access Investment Plan (PAIP) and Workforce Impact Report (WIR) for all Port of Los Angeles (POLA) leasing and development actions – whether codified through a City Charter amendment or through the Los Angeles Administrative Code – and our strong opposition to any effort to extend such requirements citywide. In this letter, we expand upon our earlier expression in committee to address some of the remarks made in that setting. Requirements of this nature are more appropriately placed in the LAAC than in the City Charter, preserving necessary operational flexibility. Embedding a specific WIR methodology in the City Charter would ultimately limit the City's ability to make future adjustments and require voter approval for any subsequent changes — an unnecessarily cumbersome and inflexible outcome. Councilmember McCosker expressed in a committee hearing that opponents of the PAIP are free to appear before the Port Commission on any Thursday and make their case. We take that point – and we do engage regularly with the Port. But this is precisely the argument for keeping the PAIP in the administrative realm rather than the Charter. If the Commission can adopt, modify, or revisit the PAIP through its ordinary processes, then Charter codification is unnecessary. Locking the PAIP into the Charter removes the very flexibility the Councilmember is describing and makes future adjustments dependent on a vote of the entire City electorate. That is not a feature – it is the concern. As we expressed to the committee, requiring tenants and applicants at marine terminals to prepare workforce impact reports as a condition of lease approvals, amendments, and permits would significantly lengthen lease negotiations, increase regulatory and compliance burdens, and signal to prospective tenants that Los Angeles is a more difficult and costly place to invest than competing ports. The Port of Los Angeles has maintained its status as the busiest container port in the Western Hemisphere precisely because of its operational efficiency and attractiveness to global shipping partners. These proposals risk trading that competitive advantage for a rigid, labor-conditional permitting structure that could delay critical economic activity at a time when efficiency and investment are

essential. Councilmember McCosker correctly observed in committee that City permit and lease applications ask for job impact descriptions. Again, this observation reinforces the Chamber's position. If workforce data is already part of the application process, the question is not whether it should be gathered, but whether it should be elevated into a Charter-mandated precondition for approval – with all the procedural weight, litigation risk, and inflexibility that entails. The Chamber's concern is not transparency; it is the conversion of an informational disclosure into a Charter-level approval condition that exposes every single lease and permit to new legal challenge and competitive uncertainty. We also note that the automation concerns motivating these proposals, while understandable, deserve a more targeted and evidence-based policy response. Adding layers of prescriptive reporting requirements to every leasing or permitting action is not a proportionate or effective answer to those concerns, and risks creating collateral harm to Port operations and the broader regional economy. A categorical prohibition on public investment in certain technologies, embedded in the City Charter, could disqualify the Port from federal infrastructure programs, constrain its ability to pursue safety and electrification upgrades, and place Los Angeles at a structural disadvantage as compared with competing ports that face no such restriction. We are aware that some City leaders have expressed interest in applying a standardized WIR framework across City departments — extending workforce impact analysis requirements to major contracts, infrastructure investments, and other policy decisions citywide. The Chamber strongly opposes this expansion. This would dramatically increase the cost, complexity, and duration of routine government procurement and contracting. It would impose new and uncertain compliance obligations on businesses seeking to work with the City, disproportionately burdening smaller firms and disadvantaged business enterprises that lack the administrative capacity to navigate evolving reporting mandates. More broadly, it would send a troubling signal that Los Angeles views workforce regulation as a precondition for economic participation — a posture that threatens job creation rather than protecting it. The Chamber recognizes the City's legitimate interest in workforce development and is a committed partner in efforts to connect Angelenos with good-paying jobs. But effective workforce policy is built on investment in training,

April 28, 2026

Los Angeles City Council
200 N. Spring Street
Los Angeles, CA 90012

Subject: Item 9 (CF [26-0426-S1](#))

Dear Council President and Honorable Members,

On behalf of the Los Angeles Area Chamber of Commerce, we respectfully but firmly express our concerns regarding proposals to require a Public Access Investment Plan (PAIP) and Workforce Impact Report (WIR) for all Port of Los Angeles (POLA) leasing and development actions – whether codified through a City Charter amendment or through the Los Angeles Administrative Code – and our strong opposition to any effort to extend such requirements citywide. In this letter, we expand upon our earlier expression in committee to address some of the remarks made in that setting.

Requirements of this nature are more appropriately placed in the LAAC than in the City Charter, preserving necessary operational flexibility. **Embedding a specific WIR methodology in the City Charter would ultimately limit the City's ability to make future adjustments and require voter approval for any subsequent changes — an unnecessarily cumbersome and inflexible outcome.**

Councilmember McCosker expressed in a committee hearing that opponents of the PAIP are free to appear before the Port Commission on any Thursday and make their case. We take that point – and we do engage regularly with the Port. But this is precisely the argument for keeping the PAIP in the administrative realm rather than the Charter. If the Commission can adopt, modify, or revisit the PAIP through its ordinary processes, then Charter codification is unnecessary. Locking the PAIP into the Charter removes the very flexibility the Councilmember is describing and makes future adjustments dependent on a vote of the entire City electorate. That is not a feature – it is the concern.

As we expressed to the committee, requiring tenants and applicants at marine terminals to prepare workforce impact reports as a condition of lease approvals, amendments, and permits **would significantly lengthen lease negotiations, increase regulatory and compliance burdens, and signal to prospective tenants that Los Angeles is a more difficult and costly place to invest than competing ports.** The Port of Los Angeles has maintained its status as the busiest container port in the Western Hemisphere precisely because of its operational efficiency and attractiveness to global shipping partners. These proposals risk trading that competitive advantage for a rigid, labor-conditional permitting structure that could delay critical economic activity at a time when efficiency and investment are essential.

Councilmember McCosker correctly observed in committee that City permit and lease applications ask for job impact descriptions. Again, this observation reinforces the Chamber's position. **If workforce data is already part of the application process, the question is not whether it should be gathered, but whether it should be elevated into a Charter-mandated precondition for approval – with all the procedural weight, litigation risk, and inflexibility that entails.** The Chamber's concern is not transparency; it is the conversion of an informational disclosure into a Charter-level approval condition that exposes every single lease and permit to new legal challenge and competitive uncertainty.

We also note that the automation concerns motivating these proposals, while understandable, deserve a more targeted and evidence-based policy response. Adding layers of prescriptive reporting requirements

to every leasing or permitting action is not a proportionate or effective answer to those concerns, and risks creating collateral harm to Port operations and the broader regional economy. **A categorical prohibition on public investment in certain technologies, embedded in the City Charter, could disqualify the Port from federal infrastructure programs, constrain its ability to pursue safety and electrification upgrades, and place Los Angeles at a structural disadvantage as compared with competing ports that face no such restriction.**

We are aware that some City leaders have expressed interest in applying a standardized WIR framework across City departments — extending workforce impact analysis requirements to major contracts, infrastructure investments, and other policy decisions citywide. **The Chamber strongly opposes this expansion.** This would dramatically increase the cost, complexity, and duration of routine government procurement and contracting. It would impose new and uncertain compliance obligations on businesses seeking to work with the City, disproportionately burdening smaller firms and disadvantaged business enterprises that lack the administrative capacity to navigate evolving reporting mandates. More broadly, it would send a troubling signal that Los Angeles views workforce regulation as a precondition for economic participation — **a posture that threatens job creation rather than protecting it.**

The Chamber recognizes the City's legitimate interest in workforce development and is a committed partner in efforts to connect Angelenos with good-paying jobs. But effective workforce policy is built on investment in training, education, and worker support — not on creating new bureaucratic checkpoints that make it harder to do business with or in the City of Los Angeles.

The Chamber strongly urges the City Council to reject Charter codification of the WIR and PAIP framework, and equally to reject implementation of these requirements through the Administrative Code at the Port or citywide. We urge instead a balanced approach that supports genuine workforce investment, maintains administrative flexibility, preserves the Port's global competitiveness, and avoids imposing unnecessary regulatory burdens on the businesses and workers that drive the Los Angeles economy.

We welcome continued dialogue on these important issues and stand ready to work with the Council toward policy solutions that serve both workers and the broader economic interests of our region. If you have any questions or wish to discuss this matter further, please reach out to Carlos Singer, Chief Policy Officer, CSinger@lachamber.com.

Sincerely,



Carlos Singer
Chief Policy Officer