Communication from Public

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Comments for Public Posting:	Please see attached letter. Thank you.

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Via Electronic Mail

August 25, 2025

Planning and Land Use Management Committee
City of Los Angeles
John Ferraro Council Chamber, Room 340
200 North Spring Street
Los Angeles, CA 90012

Re: Industrial Stakeholder (BCIF/BTC III) Comment re Agenda Item No. 11 and 12: CF 25-0774 (Wilmington–Harbor City) and CF 25-0775 (Harbor Gateway)

Dear Honorable Members of the Planning and Land Use Management Committee:

This firm represents BCIF Harbor Gateway Logistics Center LP and BTC III Gateway Logistics Center LP ("BCIF/BTC III") with respect to two existing industrial properties BCIF/BTC III owns and operates located in the Harbor Gateway community in the City of Los Angeles ("City"). On behalf of BCIF/BTC III, for inclusion in the administrative record, we submit this comment letter to the Planning and Land Use Management Committee concerning the Harbor LA Community Plans Update, which includes both the Harbor Gateway Community Plan Update (Council File No. 25-0775; Agenda Item 13) and the Wilmington–Harbor City Community Plan Update (Council File No. 25-0774; Agenda Item 12) (together, the "Proposed Update"). These matters are calendared on the August 26, 2025, PLUM agenda.

BCIF/BTC III, and similarly situated industrial stakeholders, have a substantial and direct interest in the Proposed Update. The regulatory framework established through these proceedings will govern the continued operation, reinvestment, and modernization of legacy logistics and industrial facilities situated within the Harbor districts—facilities that have long served as critical supply-chain infrastructure supporting the Ports of Los Angeles and Long Beach. These facilities not only play an essential role in ensuring the efficient movement of goods through the nation's busiest port complex, but also sustain thousands of high-wage jobs and generate significant fiscal revenues for the City. For this reason, the policy choices embedded within the Proposed Update carry implications extending well beyond the boundaries of the Harbor Gateway and Wilmington–Harbor City Community Plan Areas.

As the Committee is aware, the City Planning Commission ("CPC") conducted its public hearing on the Proposed Update on February 8, 2024, and, following extensive public testimony, recommended adoption of the Plans with modifications. Since that time, the Department of City Planning has continued to engage with stakeholders, including BCIF/BTC III, and has transmitted to this Committee a series of supplemental materials, most recently the Director of Planning Technical Memo to PLUM (Aug. 20, 2025) and accompanying Revised Actions, which identify targeted corrections and optional Council modifications. These refinements include several material adjustments responsive to the concerns voiced by industrial stakeholders at the CPC hearing. We appreciate the extensive work reflected in those materials by Planning staff.

BCIF/BTC III's principal interest is in preserving the ability of longstanding logistics and warehousing uses to reinvest, modernize, and operate effectively near the Port while meeting contemporary design and community-compatibility objectives. In that regard, we wish to acknowledge several meaningful improvements Planning has advanced since CPC—each of which responds to feasibility concerns raised by the industrial stakeholder community and is documented in the Council File record:

- **I4 "Other Allowed Use" Requirement Reduced.** The Department's August 20, 2025 revisions lower the ancillary "other allowed use" requirement in the Light Industrial, Park (I4) Use District from the prior 0.25 FAR (as adopted at CPC) to 0.05 FAR, applicable when **Wholesale Trade & Warehousing** is the primary use. The Article 5 use framework for I4 reflects this change and assigns the relief pathway to "Relief C2," with supplemental procedures identified at Section 5B.8.4.D.5. (Article 5, Sec. 5B.8.4 [I4], "Other allowed use 0.25→0.05 FAR; Relief C2; see Sec. 5B.8.4.D.5.") This calibration, memorialized in the PLUM packet, brings the standard into line with the operational realities of warehousing while maintaining an administratively manageable relief mechanism.

- **Transparency Standards Moderated.** Ground-floor transparency minimums that previously mirrored retail storefront requirements are reduced to values suitable for industrial and non-retail buildings. The PLUM packet revises Article 3 tables for frontage districts including MU4 and SH4, reducing **Ground Story transparency** to as low as 35 percent where 50–70 percent had been proposed earlier. For example, the MU4 table now shows "50% → 35%" in the transparency row, while the SH4 table similarly adjusts transparency percentages and related façade standards. (Article 3, Sec. 3B.2.4 [MU4]; Sec. 3B.4.4 [SH4].) These revisions avoid imposing retail-style glazing requirements on warehouses and reconcile design standards with security, energy, and operational needs.

- **Building Depth and Active Depth Clarified.** Maximum building-depth requirements and related "active depth" standards in the Form and Frontage framework have been moderated to avoid overly deep single-bar buildings while preserving flexibility for industrial and flex layouts. The G-series (G3) and SH-series (SH4) frontage tables have been updated, and a new Active Depth standard codified at Section 3C.1.5 provides a clear measurement rule together with an "Adjustment" allowing up to a 20 percent reduction. (Article 3, Sec. 3B.3.3 [G3]; Sec. 3B.4.4 [SH4]; Sec. 3C.1.5 [Active Depth].) These clarifications reduce the need for case-by-case discretionary relief where industrial programming necessitates shallower or segmented building forms.

- **LB3 Lot Amenity Standard Reduced.** In the LB3 Form District, the required lot amenity set-aside has been reduced from 20 percent of lot area (as in the CPC version) to 10 percent. The PLUM packet's Article 2 table shows the "Lot amenity space (min)" row revised to 10 percent. (Article 2, Sec. 2B.10.3 [LB3], amenity row—10% replacing CPC's 20%.) This change materially improves site efficiency for large industrial parcels while maintaining a baseline of open-space and landscape features.

- **Landscaping Obligations Reduced.** Finally, the PLUM packet reduces planting-area minimums embedded in the frontage standards. For example, the SH4 frontage table shows the "Frontage planting area (min)" requirement reset to 12 percent, down from higher percentages carried over in the CPC draft (the same page depicts prior 20 percent values struck through). (Article 3, Sec. 3B.4.4 [SH4], "Frontage planting area (min)" row at 12%.) Similar adjustments are carried across frontage tables applied to industrial corridors, aligning landscaping obligations with logistics frontages while preserving the intended pedestrian-realm improvements.

BCIF/BTC III commends Planning staff for advancing these calibrations, which we understand would only apply to *new* industrial development within the Plan Areas and therefore would not render existing industrial facilities, such as those owned and operated by BCIF/BTC III, as legal nonconforming. The calibrations collectively reflect careful listening and a good-faith effort to balance the City's design objectives with the functional requirements of port-serving industry.

There is, however, an implementation clarification that remains essential to memorialize now—both for predictability and to avoid unnecessary implementation issues that may arise later down the road. As noted above, the I4 District now pairs Wholesale Trade & Warehousing with an "Other allowed use" minimum of 0.05 FAR, with relief labeled "C2" and supplemental procedures cross-referenced to Sec. 5B.8.4.D.5. Based on our office's ongoing discussions with City Planning staff, our understanding is that accessory office space that is customary and incidental to warehousing/logistics operations qualifies as, and does/shall satisfy, the "other allowed use" component when it meets the 0.05 FAR threshold.

We appreciate staff's confirmation of this interpretation in conversation; however, because Chapter 1A is lengthy, complex and will be implemented at the counter by many hands over time, we respectfully request an express sentence be added to Sec. 5B.8.4 stating that accessory office associated with a warehouse/logistics use may count toward the "other allowed use" requirement. This small text addition would mirror staff's stated approach, promote consistent plan-check decisions, and obviate case-specific filings merely to confirm the underlying intent of the policy.

We also want to briefly address the new Hybrid Industrial concept introduced in the Harbor LA Plans. BCIF/BTC III's parcels are not within a proposed Hybrid designation, and we understand the City's rationale of using Hybrid to manage edges and transitions. Even so, as a participant in the Plan Area's logistics economy, BCIF/BTC III wishes to make an important caveat: Hybrid can, in practice, pull sensitive or publicly accessible uses into traditionally industrial corridors, increasing the likelihood of land-use friction right where regional goods-movement's efficiencies are greatest. In intent, Hybrid is framed as a buffer; in application, it risks functioning as the reverse of the buffering direction that state policy has emphasized—placing sensitive receptors nearer to freight activity rather than reinforcing separation of these fundamentally incompatible uses. Given the recent adoption of Assembly Bill 98 and other recent state legislation, which effectively stand for the reverse approach of ensuring that new industrial uses are not sited in close proximity to existing residential or other sensitive uses, the Hybrid designation should be deployed sparingly or not at all in the Harbor, with performance standards and siting criteria that protect port-adjacent industrial functionality and avoid the inevitable conflicts between the introduction of new "live work" and similar uses with pre-existing legacy industrial operations.

BCIF/BTC III supports Council adoption of the targeted corrections summarized above. We also respectfully request that your action include direction to incorporate an explicit clause in Sec. 5B.8.4 confirming that accessory office associated with warehouse/logistics may satisfy the "other allowed use" minimum. That direction would simply codify staff's stated implementation intent and provide durable guidance to City staff who will be tasked with implementing this for years to come. (Article 5, Sec. 5B.8.4 [I4]—table and procedures cited in the PLUM packet.)

We acknowledge and appreciate the substantial effort by City Planning staff to refine the Harbor LA Plans between CPC and the PLUM transmittal. These adjustments, listed above, together reflect a thoughtful balancing effort responsive to stakeholder input. We ask that the

Committee adopt these improvements and add the narrow clarification requested above so the ordinance text is unambiguous at implementation.

We remain available to confer with the Committee and staff at any time, and would welcome the opportunity to assist in finalizing clarifying language requested above or any other provisions necessary to ensure that the intent of the Proposed Update is faithfully implemented.

Very truly yours,

Paige H. Gosney

cc: BCIF/BTC III (via e-mail only)