

August 25, 2025

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

Re: NAIOP SoCal's Public Comment on Agenda Item Numbers 11 and 12 —
CF 25-0774 (Wilmington–Harbor City) and CF 25-0775 (Harbor Gateway)

Honorable Members of the Planning and Land Use Management Committee:

On behalf of NAIOP SoCal and our 1,200 Members engaged in commercial real estate investment, development and services, we submit these comments regarding the Harbor LA Community Plan Updates under consideration as Agenda Items 11 and 12. Many of our Members own and operate industrial facilities in the Harbor Gateway and Wilmington-Harbor City areas. These facilities are vital to goods movement at the Ports of Los Angeles and Long Beach, sustaining thousands of jobs and significant fiscal benefits for the City.

We commend City Planning staff for the thoughtful refinements reflected in the August 20, 2025 PLUM packet. Adjustments to ancillary use requirements in the I4 District, transparency standards, building-depth rules, landscaping, and lot-amenity obligations demonstrate a balanced approach that responds to stakeholder input while advancing community design objectives. These improvements will help ensure longstanding port-serving industries can modernize and operate effectively.

We also urge the Committee to ensure the Harbor LA Community Plans are consistent with recently enacted state law, particularly AB 98 (Government Code Section 65302.02, 2024). Allowing new sensitive uses or receptors – such as multifamily or mixed-use residential, schools, hospitals, or elder care facilities – adjacent to existing industrial operations in the Harbor communities would risk direct conflict with AB 98. Such siting would not only undermine compliance with state statute but also create avoidable land use friction in areas that are critical to the region's goods movement economy.

One important clarification remains: In the I4 Light Industrial, Park Use District, the framework now requires an "other allowed use" minimum of 0.05 FAR when Wholesale Trade & Warehousing is the primary use. Based on staff's guidance, accessory office space customary to logistics operations may count toward this requirement. To provide clear and consistent implementation, we respectfully request that the final ordinance text explicitly state this interpretation in Section 5B.8.4.

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With this clarification, NAIOP SoCal supports adoption of the Harbor LA Community Plan Updates. We appreciate the Committee's leadership and staff's diligence in advancing plans that balance community goals with the operational needs of the region's goods movement economy.

Thank you for your consideration of NAIOP SoCal's concerns and our requested clarification.

Sincerely,

Mihran Toumajan

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