

Communication from Public

Name: BCIF/BTC III
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Comments for Public Posting: Please see attached comment letter.

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Via Electronic Submission

September 8, 2025

Honorable City Council
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 14
— Council File No. 25-0775; Agenda Item 13 — Council File No. 25-
0774**

Dear Honorable Councilmembers:

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 Los Angeles City Council concerning the Harbor LA Community Plans Update, which includes both the Harbor Gateway Community Plan Update (Council File No. 25-0775; Agenda Item 14) and the Wilmington–Harbor City Community Plan Update (Council File No. 25-0774; Agenda Item 13) (together, the “Proposed Update”). These matters are calendared on the September 9, 2025 City Council agenda.

BCIF/BTC III—and similarly situated industrial operators—have a direct stake in the Proposed Update, which will set the rules for continuing operations, reinvestment, and modernization of long-standing logistics and industrial facilities in the Harbor districts. These facilities form critical links in the supply chain serving the Ports of Los Angeles and Long Beach, underpinning efficient goods movement while supporting thousands of well-paid jobs and substantial City revenues.

As the Council is aware, on August 26, 2025, the Planning and Land Use Management (“PLUM”) Committee voted unanimously to recommend approval of the Proposed Update as revised by the Department of City Planning following the City Planning Commission hearing. We commend Planning staff for their sustained engagement and for advancing targeted revisions that materially improve workability while preserving the Plans’ environmental justice and urban design

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objectives—most notably the calibration of the I4 “other allowed use” ratio, the moderation of frontage transparency and building-depth standards, and the refinement of amenity and landscaping requirements. These changes strike a pragmatic balance by reducing unnecessary friction for port-serving industrial operations without diluting the City’s policy goals. In advance of PLUM, our office submitted a letter on behalf of BCIF/BTC III supporting these corrections and requesting one narrow implementation clarification in the ordinance text; we incorporate that letter here by reference.

Our request to Council herein is focused and textual. To ensure consistent implementation of the I4 standard across similarly situated sites, we respectfully ask that the Council’s action on the Proposed Update include explicit direction that Section 5B.8.4 (I4 — Light Industrial, Park) state that accessory office space customarily incidental to warehousing/logistics counts toward, and may satisfy, the “other allowed use” minimum associated with Wholesale Trade & Warehousing. Planning staff has communicated this interpretation in substance, and memorializing it in the ordinance text will avoid counter-level uncertainty as Chapter 1A is implemented.

A single clarifying sentence would suffice, for example: *“For purposes of the ‘other allowed use’ minimum applicable to Wholesale Trade & Warehousing in the I4 Use District, accessory office space that is customarily incidental to the principal warehousing/logistics use is an ‘other allowed use’ and may be counted toward the required floor area.”*

This clarification does not alter the underlying policy direction or expand the scope of permitted activities. It codifies staff’s stated approach, preserves the calibrated balance of the package recommended by PLUM, and promotes uniform permitting outcomes. Express text will reduce the need for discretionary filings brought solely to confirm this interpretation, conserve administrative resources, and provide clear and lasting guidance to zoning and plan check staff as the Proposed Update moves from adoption into day-to-day implementation.

BCIF/BTC III appreciates the Council’s consideration as this multi-year planning effort approaches conclusion. We support adoption of the calibrated package as recommended by PLUM and respectfully request that the foregoing clarifying language regarding Section 5B.8.4 be included in the Council’s action on September 9, 2025, or, alternatively, be transmitted for incorporation during form-and-legality or through the technical-corrections vehicle referenced in the staff materials.

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Please include this letter in the administrative record for Agenda Item 14 (Council File No. 25-0775) and Agenda Item 13 (Council File No. 25-0774). Thank you for your consideration.

Very truly yours,

A handwritten signature in blue ink, appearing to read "P. Gosney", with a stylized flourish at the end.

Paige H. Gosney

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