

## Communication from Public

**Name:** Faizah Malik

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**Council File No:** 22-0617-S3

**Comments for Public Posting:** Please see attached a letter from the Central City United Coalition regarding the Downtown Community Plan update. Faizah Malik  
Public Counsel



October 14, 2024

*Delivered via electronic mail*

Los Angeles City Council  
Planning and Land Use Management Committee  
200 N. Spring Street  
Los Angeles, CA 90012

Re: CF 22-0617 - Downtown LA Community Plan Update

Dear Councilmembers:

The Central City United (CCU) Coalition, which is comprised of community groups from Skid Row, Little Tokyo, and Chinatown, is pleased to offer the following comments and recommendations to advance equity and racial justice in the Downtown Community Plan update. We are grateful to the City Council for its engagement and thoughtful consideration thus far, which has resulted in the inclusion of many of CCU's community-centered policy recommendations. As the Plan nears final adoption, there are several remaining areas where the Plan still needs important changes in order to advance equity and justice throughout Downtown. We offer the following comments and suggestions on the final outstanding report backs regarding the IX1 zone, in lieu funds in the Plan Area, and affordability in adaptive reuse projects.

**Only 100% Affordable Housing Development Should Be Included in the IX1 Use District, and the Definition of "Community Facilities" Should Not Be Broadened.**

CCU maintains our original position that only 100% affordable housing development should be permitted in the IX1 use district in Skid Row, and the boundaries of IX1 should be expanded to reflect the true boundaries of Skid Row. As the lowest-income neighborhood in Los Angeles, the neighborhood needs more affordable housing that serves, rather than displaces, existing residents.

We agree with the Department of City Planning's (DCP) report recommendation that the existing zoning standards established by the City Council when it adopted the Downtown Community Plan should be preserved. The zoning should not be changed to accommodate Community Facilities as Council District 14 has requested. As DCP's report states, the IX1 use district was established to prioritize the provision of affordable housing. Providing Community Facilities in lieu of affordable housing would undermine the goals for the special use district and result in

fewer needed housing units. As DCP's report states, any changes to allow for the incentivization of Community Facilities in IX1 would necessitate a further reduction of the 80% affordability adopted by the Council.

We also oppose any broadening of the definition of "Community Facilities" in the Community Benefits Program to incentivize uses as hair salons, barber shops and pet stores within the IX1 area. The currently proposed definition is a result of DCP's extensive engagement with the most impacted residents of DTLA. The additional uses proposed in this broader definition are not deemed priority community-serving uses by the residents who live in Skid Row, and rather represent the hostility and violence of gentrification.

We respectfully urge the Council to not make further changes to dilute the IX1 use district in response to Council District 14's motion.

### **Earmark In-Lieu Affordable Housing Funds for Downtown Projects Through the Managed Pipeline.**

CCU also urges the City Council to modify guidelines for the use of in lieu funds generated from projects in the Downtown Community Plan Area. This is the subject of a motion from Council District 1, which DCP has submitted a report back for. We ask PLUM to agendize this report back as soon as possible.

Although CCU continues to oppose the inclusion of an in lieu option in the Plan, if an in-lieu fee option will remain in the Plan and funds are deposited in a Citywide Affordable Housing Trust Fund, as proposed by DCP in its report back, we ask that the City earmark in-lieu fees generated from DTLA developments for affordable housing projects located in the DTLA Plan Area. As DTLA will be generating the lion's share of housing units for the City, we want to see our low-income communities benefit from the development and not be displaced from Downtown. The City can earmark in lieu funds for Downtown projects in the Managed Pipeline application process.

This proposal is both equitable and administratively feasible. First, Downtown is a singular and unique area in Los Angeles, containing both the wealthiest and lowest-income residents in the city. By allocating in lieu fees generated from market rate development in Downtown to Downtown affordable housing projects, the City will be furthering its fair housing goals by preventing displacement of existing low-income communities and building affordable housing in a high opportunity area of the city. The City will also be reducing the risk of homelessness, as the Plan is currently the only area in the City that will generate Acutely Low-Income units.

Our proposal is also administratively feasible. We are mindful of DCP's concerns around the administration of trust funds for each community plan area in the city. Creating a system to earmark funds for Downtown projects through the Managed Pipeline process is more streamlined and routine as LAHD already has to do this for other funding sources. Additionally,

the scale and pace of development in Downtown will ensure that there will be no orphaned funds.

Therefore, we urge the City Council to instruct DCP and the Los Angeles Housing Department to create a process and procedure in the Managed Pipeline for earmarking in lieu funds from the Downtown Plan Area for Downtown affordable housing projects.

**Conduct Feasibility Studies for Affordable Housing in Adaptive Reuse Projects Every Two Years.**

Finally, CCU also recommends that the City Council also adopt additional guidelines for adaptive reuse projects in the Plan to consider the inclusion of affordable housing requirements. Adaptive reuse is the subject of another outstanding DCP report back.

While DCP's 2022 study found that including affordable housing in adaptive reuse projects was not feasible given the then-recent impacts of the pandemic, the City should preserve the ability to add affordable housing requirements later. Market conditions will certainly continue to shift in the coming years, and the City's affordable housing policy should stay up-to-date and responsive towards these changes.

Therefore, we urge the City Council to instruct DCP to conduct a feasibility study of affordable housing set-asides for adaptive reuse projects in the Plan Area every 2 years. This will provide the City with a process and method to stay responsive to changing market conditions over time. If the study finds that it is feasible, DCP should be required to implement a requirement for affordable housing in adaptive reuse projects.

**Conclusion**

The Downtown Community Plan represents a framework for equitable growth and just recovery in a key region of Los Angeles. As the Plan nears final adoption, the City Council should adopt our outstanding recommendations to ensure the Plan adequately protects current low-income and houseless Downtown residents, creates new opportunities for safe and affordable housing, opens the economy to low-income entrepreneurs, and establishes a model for equitable community planning. Thank you.

Sincerely,

The Central City United Coalition  
(LA CAN, Little Tokyo Service Center, SEACA, Public Counsel)