

## Communication from Public

**Name:** Doug Smith

**Date Submitted:** 04/17/2023 09:53 AM

**Council File No:** 22-0617

**Comments for Public Posting:** The Central City United Coalition (CCU) is led by Little Tokyo Service Center (LTSC), the Los Angeles Community Action Network (LA CAN), and the Southeast Asian Community Alliance (SEACA), as key stakeholders in Little Tokyo, Skid Row, and Chinatown, along with Public Counsel. CCU formed to lift up the voices and concerns of the poorest and most vulnerable residents of Downtown in the Plan update process. We know from experience that community-led planning results in healthier, more stable communities. CCU has been engaged with the Downtown LA Community Plan update process since its inception. We have spent, separately and collectively, thousands of hours convening community meetings, conducting outreach, and engaging our communities across seven languages about the community plan process and discussing its impacts. Through this, we have built capacity among local residents to be active participants in the planning process. The CCU People's Plan, and our specific recommendations listed below, are the result of our collective community engagement and reflect the priorities and needs of residents in Little Tokyo, Skid Row, and Chinatown. As the City grapples with institutional racism and structural injustice, we applaud the Department of City Planning for acknowledging the deep harms that past land use and planning policies have inflicted on low-income communities and communities of color. Now, as the City commits to repairing these harms, the Community Plans are tools to do just that. As the framework for growth, development and investment in Downtown for years to come, this Plan must center the needs and priorities of those communities that have been most harmed. The Downtown LA Community Plan is one of the most important opportunities for the City to put its stated commitment to racial justice into practice. To advance a more inclusive and equitable Plan, we ask the Council to take the following actions. 1. Adopt the graduated affordable housing program recommended by the Department of City Planning. 2. Ensure that new affordable housing created by the Plan is actually located in the Downtown LA Community Plan Area. 3. Require mixed-income projects to utilize Schedule 6 rents for affordable units. 4. Include a new Program creating a Displacement Impact Analysis. 5. Require replacement of Acutely Low, Extremely Low and Very Low-Income units at the same or lower affordability

level and apply this requirement across all projects. 6. Include on-site affordable housing in all Adaptive Reuse projects. 7. Expand IX1 to reflect the true boundaries of the Skid Row neighborhood. 8. Expand Community Facilities incentives to support street vendors and Small Legacy Businesses. 9. Prevent displacement and promote good garment manufacturing jobs 10. Create stronger standards for hotel development review



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

*Delivered via electronic mail.*

April 17, 2023

RE: **CF 22-0617 – Downtown LA Community Plan**

Dear Councilmembers,

We are pleased to offer the following comments and policy recommendations to advance equity and racial justice in the Downtown LA Community Plan update. We are grateful to the Planning Department and the City Planning Commission for their engagement and thoughtful consideration, resulting in the inclusion of many community-centered policy recommendations in the current draft. We urge the Council to adopt these recommended new equity provisions. Additionally, there are other areas where the Plan still needs important changes in order to advance equity and justice throughout downtown. As described in detail in this letter, we urge the Council to:

- 1. Adopt the graduated affordable housing program recommended by the Department of City Planning.**
- 2. Ensure that new affordable housing created by the Plan is actually located in the Downtown LA Community Plan Area.**
- 3. Require mixed-income projects to utilize Schedule 6 rents for affordable units.**
- 4. Include a new Program creating a Displacement Impact Analysis.**
- 5. Require replacement of Acutely Low, Extremely Low and Very Low-Income units at the same or lower affordability level and apply this requirement across all projects.**
- 6. Include on-site affordable housing in all Adaptive Reuse projects.**
- 7. Expand IX1 to reflect the true boundaries of the Skid Row neighborhood.**
- 8. Expand Community Facilities incentives to support street vendors and Small Legacy Businesses.**
- 9. Prevent displacement and promote good garment manufacturing jobs**
- 10. Create stronger standards for hotel development review**

The Central City United Coalition (CCU) is led by Little Tokyo Service Center (LTSC), the Los Angeles Community Action Network (LA CAN), and the Southeast Asian Community Alliance (SEACA), as key stakeholders in Little Tokyo, Skid Row, and Chinatown, along with Public Counsel. CCU formed to lift up the voices and concerns of the poorest and most vulnerable residents of Downtown in the Plan update process. We know from experience that community-led planning results in healthier, more stable communities. CCU has been engaged with the Downtown LA Community Plan update process since its inception. We have spent, separately and collectively, thousands of hours convening community meetings, conducting outreach, and engaging our communities across seven languages about the community plan process and discussing its impacts. Through this, we have built capacity among local residents to be active participants in the planning process. The CCU People's Plan, and our specific recommendations listed below, are the result of our collective community engagement and reflect the priorities and needs of residents in Little Tokyo, Skid Row, and Chinatown.

As the City grapples with institutional racism and structural injustice, we applaud the Department of City Planning for acknowledging the deep harms that past land use and planning policies have inflicted on low-income communities and communities of color. Now, as the City commits to repairing these harms, the Community Plans are tools to do just that. As the framework for growth, development and investment in Downtown for years to come, this Plan must center the needs and priorities of those communities that have been most harmed. The Downtown LA Community Plan is one of the most important opportunities for the City to put its stated commitment to racial justice into practice. To advance a more inclusive and equitable Plan, we ask the Council to take the following actions.

**1. Adopt a “graduated” affordable housing program.**

We support the recommendation from the September 2022 Director of Planning's Memo to the PLUM Committee (“Director's Memo”) to adopt a graduated inclusionary system. This approach would apply affordable housing requirements to the base FAR, while retaining the additional affordable housing incentives program for projects seeking additional FAR. This graduated system allows the Plan to respond to changing market conditions over the lifespan of the Plan, maximizing on-site affordable housing production and creating greater certainty.

**2. Ensure that new affordable housing created by the Plan is actually located in the Downtown LA Community Plan Area.**

The Inclusionary Housing program ordinance language in the Director's Memo includes an in-lieu fee option that appears to be a direct copy of the in-lieu fee requirement in Measure JJJ, which makes the fee payable to the citywide Affordable Housing Trust Fund.

We recommend adopting an inclusionary program without an in-lieu fee option. The proposed graduated inclusionary and Community Benefits Programs are intended to be tools to promote inclusive development. Allowing projects to satisfy affordable housing obligations through an in-lieu fee

undermines this goal by separating the residents of new market-rate housing from the residents of affordable housing, and exacerbates segregated development patterns to the detriment of a diverse community. For this reason, neither the TOC, nor the various CPIO incentive programs include in-lieu fee options. While AB 1505 requires that inclusionary programs must provide alternative means for compliance, there is no requirement that this take the form of an in-lieu fee. Land dedication and off-site construction are valid “alternatives.” To the extent the Council wishes to retain the in-lieu fee option, we urge an amendment that requires the funds to be spent within the Downtown LA Community Plan Area.

### **3. Require mixed-income projects to utilize Schedule 6 rents for affordable units.**

Consistent with longstanding City policy, affordable units in mixed-income projects created under the CPIO incentives and inclusionary programs should follow HCD Schedule 6 rents. It is our assumption that the various feasibility analyses assumed Schedule 6 rents and there is no valid policy reason to increase rents on Extremely- and Very-Low Income households in mixed-income developments that have been evaluated under the Schedule 6 rents. We are concerned with the LAHD decision to shift mixed-income TOC projects to Schedule 1 citywide, and we encourage you to clarify that mixed-income projects in the Downtown LA Community Plan will continue to use Schedule 6, consistent with longstanding practice.

### **4. Include a new Program creating a Displacement Impact Analysis.**

Numerous Plan policies speak to the importance of preventing residential and small business displacement, however the Plan does not include Implementation Programs adequate to achieve these objectives. The Plan should be amended to include the following Program to establish an analysis of residential and business displacement pressures, and a mechanism to develop responsive plan and policy changes as needed:

Program Number	Description	Policy Reference	Coordinating Agency
PXX	Displacement Impact Analysis: Create a Displacement Impact Analysis that collects data and monitors displacement pressures on low-income residents, rent stabilized and affordable housing, Legacy Small Businesses, garment industry employment, and other small businesses; and provides recommended stabilization strategies, such as targeted plan and code amendments, if displacement risk is identified.	LU 2.10; LU 2.12, LU 3.2, LU 3.8, LU 8.7	LAHD, Mayor

**5. Require replacement of Acutely Low, Extremely Low and Very Low-Income units at the same or lower affordability level and apply this requirement across all projects.**

The Director's Memo recommends changes to the 1:1 replacement requirement, which may have the unintended effect of requiring Acutely Low-, Extremely Low-, and Very Low-Income units to be replaced with Low-Income units, rather than at the same affordability level (Director's Memo, pp 8-10). The provision should be revised to ensure that more deeply affordable units are replaced with units at the same or lower income levels. We recommend the following:

The housing development project meets any applicable dwelling unit replacement requirements of California Government Code Section 65915(c)(3), provided that any units subject to the Rent Stabilization Ordinance deemed or presumed to be occupied by persons or families above lower income shall be replaced with units available at affordable rent or affordable housing cost to, and occupied by, low-income persons or families pursuant to Sec. 65915(c)(3)(C)(i).

If the replacement requirements are amended as described above, then they should also apply to the Inclusionary Housing program, not just the incentive programs as currently proposed (Director's Memo, pp. 9-10). Otherwise, projects utilizing the graduated inclusionary program (inclusionary program requirements on the Base FAR and CPIO incentives for the Bonus FAR) would face two different replacement requirements, creating unnecessary confusion and weakening protections for renters.

**6. Include on-site affordable housing in all Adaptive Reuse projects.**

The Director's Memo now recommends removing on-site affordability standards for all adaptive reuse projects. We oppose this change, which weakens affordable housing standards in the midst of a crisis. All projects, including adaptive reuse, should contribute to addressing the affordable housing crisis. At the very least, the Council should add benchmarks to reassess and add affordable housing standards into adaptive reuse projects as market conditions change, to ensure that we don't lose opportunities for mixed-income adaptive reuse.

**7. Expand IX1 to reflect the true boundaries of the Skid Row neighborhood.**

The IX1 district, which is currently bounded by San Pedro Street, 5th Street, Central Avenue, and 7th Street, is the only use district in the Draft Downtown Community Plan Zones where residential uses are restricted to only affordable housing. There are other areas of the Skid Row neighborhood not currently covered by this use district that need the same affordable housing prioritization and displacement protections afforded by the IX1 district. Given the income and needs of the residents of these communities, the affordable housing prioritization of the IX1 district should be expanded to cover all of the area bounded by Main Street, 3rd Street, Alameda Street, and 8th Street. Additionally, the use district should be modified to require all Restricted Affordable Units be set at housing costs affordable to Low-Income households

and lower (i.e., no Moderate-Income units). The Permanent Supportive Housing incentive should continue to apply in this use district.

## **8. Expand Community Facilities incentives to support street vendors and Small Legacy Businesses.**

The Draft CPIO Community Benefits Program includes incentives for the creation of Community Facilities, such as daycare facilities and social services. These incentives should be expanded to allow and encourage the creation of commissary and commercial kitchen spaces for low-income street vendors as well as floor plans and lease terms that support Small Legacy Businesses.

To implement these changes, we recommend the following amendments to CPIO Section II-III.3.

### **C. Community Facilities pursuant to LAMC Chapter 1A 9.3.4**

4. Projects that include a Sidewalk Vendor Commissary Kitchen or Small Legacy Business Stabilization may obtain additional floor area up to the maximum bonus FAR for the applied Form District pursuant to the Alternative Community Facilities, LAMC Chapter 1A Section 9.3.4.E.2. Sites seeking to utilize the Community Facilities incentive must dedicate a minimum of 2,500 square feet to one of the eligible uses below. In addition to the minimum required space, for every 2.5% of bonus buildable floor area dedicated to one of the following, eligible projects may obtain an additional 1.0:1 FAR:

a. **Sidewalk Vendor Commissary Kitchen.** A Project may obtain additional floor area for providing an on-site Sidewalk Vendor Commissary Kitchen, subject to the following standards:

- i. A Commissary Kitchen, pursuant to Chapter 1A Article 3, approved by the Los Angeles County Department of Public Health to accommodate all operations necessary to service compact mobile food operations; and
- ii. Made available exclusively to sidewalk vendors whose annual household income is lower than the "Low-income" category as defined by the Los Angeles Housing Department (LAHD).

b. **Small Legacy Business Stabilization.** A project may obtain additional floor area for providing a space dedicated to a Small Legacy Business, subject to the following standards:

- i. Small Legacy Business means a privately-owned corporation, cooperative, non-profit, social enterprise, or other entity that serves the neighborhood in which it is located by providing culturally relevant needed goods or services for local low-income residents, is not franchised or affiliated with a national chain, and meets at least four of the following six standards: (1) has been in continuous operation in the Downtown Community Benefit Area for at least 20 years with no break in its operations exceeding two years; (2) has no more than 50 employees/shareholders; (3) the business has contributed to the neighborhood's history and/or the identity of a particular neighborhood or community; (4) the business includes employees that can serve multi-lingual members of the

community; (5) Accepts government issued assistance such as EBT; (6) Pays employees a living wage per the City's Living Wage Ordinance.

ii. A minimum 10-year lease with, with 5-year renewal option, and a limit of no more than 5% rent increase per year during the term of the lease shall be required prior to the issuance of a Certificate of Occupancy. This requirement does not mean that the Small Legacy Business is required to complete the term of the lease. If the lease is not completed prior to the 10-year term, the property owner or their representatives shall find a new Small Legacy Business to complete the 10-year term. For the purposes of this provision, the time in which the Small Legacy Business space is vacant does not count towards the required minimum.

#### **9. Prevent displacement and promote good garment manufacturing jobs.**

We support the goals expressed by the Garment Worker Center and garment workers in the Fashion District. We urge the Committee to advance a plan that incentivizes good jobs and includes adequate protections against the displacement of high-road employment opportunities, including a strong prohibition on conversion of existing uses.

#### **10. Create stronger standards for hotel development review.**

In order to prioritize housing, prevent displacement, and ensure appropriate review, we support the recommendations provided by UNITE HERE Local 11 to require a CUP (appealable to Council) for hotel and lodging uses, with an additional finding that ensures the protection of existing residential uses and does not detract from or provide standards weaker than those required under the Wiggins Settlement or the Residential Hotel Conversion Ordinance.

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The Downtown LA Community Plan presents an important and timely opportunity to establish a framework for equitable growth and a just recovery. If done right, this Plan can protect current low-income and houseless Downtown residents, create new opportunities for safe and affordable housing, open the economy to low-income entrepreneurs, and establish a model for equitable community planning. Thank you for considering these recommendations and please reach out with any questions.

Sincerely,

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



## Communication from Public

**Name:** Abundant Housing LA

**Date Submitted:** 04/17/2023 11:43 AM

**Council File No:** 22-0617

**Comments for Public Posting:** Dear Councilmembers Marqueece Harris-Dawson, Monica Rodriguez, Katy Yaroslavsky, John Lee, and Heather Hutt: We write on behalf of Abundant Housing LA in support of adopting the Downtown Los Angeles Community Plan Update 2040 (Council File 22-0617). DTLA 2040 is the product of eight years of hard work and engagement by Department of City Planning and Downtown stakeholders. It has been ready for consideration by the Planning and Land Use Management Committee since September 2022 and now must be approved by the City Council by May 12 or it is deemed denied and must start anew. The current two community plans governing land use in Downtown LA date from 2000 and 2003. The time is now for the city to move past outdated plans and forward with a new blueprint for DTLA which provides certainty on the standards for new development and produces badly needed new housing in LA's core. Abundant Housing LA is a pro-housing, nonprofit advocacy organization working to help solve Southern California's housing crisis. We support reforms to legalize more homes, make homes easier to build, increase funding for affordable housing, and protect tenants, which are all needed to make housing more affordable, improve access to jobs and transit, promote greater environmental sustainability, and advance racial and economic equity. As a community organization, in order to maintain our independence, we do not accept financial support from housing developers or their consultants. DTLA 2040 includes many attractive components. The plan's elimination of parking minimums will make many more projects feasible, and will help developers right-size the amount of off-street parking, which will reduce the cost of construction and therefore rents. DTLA 2040 is the first community plan to employ the city's new zoning system, and the rezoning incorporated in the plan will significantly increase zoned capacity in LA's vibrant core. The plan will also test the effectiveness of a Graduated Inclusionary Zoning program with mandated base affordable requirements and higher affordability thresholds achieved through an incentive-based system. Via its 2021-2029 Housing Element, the city has committed to a goal of producing over 57,000 units of housing annually, and an aggressive rezoning program to actualize that goal. To meet this ambitious and necessary target, LA must

efficiently complete new community plans that include extensive upzoning, particularly in high opportunity areas with access to transit, jobs, and service, like DTLA. For these reasons, we urge you to approve CF 22-0617 and move the plan forward to the full council as soon as possible. Sincerely, Leonora Camner, Executive Director and Scott Epstein, Policy and Research Director Abundant Housing LA



4/17/2023

The Honorable Councilmembers Harris-Dawson, Rodriguez, Yaroslavsky, Lee, and Hutt  
Los Angeles City Council  
200 N. Spring Street  
Los Angeles, CA 90012

***Support – Downtown Los Angeles Community Plan Update 2040 – Council File 22-0617***

Dear Councilmembers Marqueece Harris-Dawson, Monica Rodriguez, Katy Yaroslavsky, John Lee, and Heather Hutt:

We write on behalf of Abundant Housing LA in support of adopting the Downtown Los Angeles Community Plan Update 2040 (**Council File 22-0617**). DTLA 2040 is the product of eight years of hard work and engagement by Department of City Planning and Downtown stakeholders. It has been ready for consideration by the Planning and Land Use Management Committee since September 2022 and now must be approved by the City Council by May 12 or it is deemed denied and must start anew. The current two community plans governing land use in Downtown LA date from 2000 and 2003. The time is now for the city to move past outdated plans and forward with a new blueprint for DTLA which provides certainty on the standards for new development and produces badly needed new housing in LA's core.

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Via its 2021-2029 Housing Element, the city has committed to a goal of producing over 57,000 units of housing annually, and an aggressive rezoning program to actualize that goal. To meet this ambitious and necessary target, LA must efficiently complete new community plans that

include extensive upzoning, particularly in high opportunity areas with access to transit, jobs, and service, like DTLA.

For these reasons, we urge you to approve CF 22-0617 and move the plan forward to the full council as soon as possible.

Sincerely,

*Leonora Camner*

Leonora Camner  
Executive Director  
Abundant Housing LA

*Scott Epstein*

Scott Epstein  
Director of Policy and Research  
Abundant Housing LA

## Communication from Public

**Name:** LA Fashion District Stakeholders

**Date Submitted:** 04/17/2023 04:05 PM

**Council File No:** 22-0617

**Comments for Public Posting:** Please see below for LA Fashion District Stakeholder Comments

**Subject:** DTLA 2040 Comments (CF 22-0617)

**Date:** Friday, April 14, 2023 at 11:57:02 AM Pacific Daylight Time

**From:** LA Fashion District BID

**To:** info

April 3, 2023

Dear Planning and Land Use Management Committee (PLUM),

I would like to thank the City Planning Commissioners, the Department of City Planning, City Staff, and the members of this committee for developing the DTLA2040 proposal. As a stakeholder in the LA Fashion District, I want to express my thoughts on the impact that staff recommendations and the Director of Planning's report will have on the future of our community.

The LA Fashion District is a vital economic hub in Downtown Los Angeles, the City at large, and the region. Our neighborhood's DNA is in the fashion and flower industries. We take great pride in and never plan to divest from those identities. However, as the city continues to grow, evolve, and become a melting pot, it is clear that the Fashion District must adapt and change to meet the needs of industries and residents seeking to call our community home.

DTLA2040 has the potential to help guide this evolution in a positive direction. In particular, I am excited by the potential of easing restrictions on daycares/new schools, removing above-grade parking from FAR calculations, increasing the minimum size + removing FAR requirements for live/work units, and opening the door to flexibility for new residential in some areas.

To protect the vitality of the Fashion District, please:

Increase the base FAR to 6:1 in Form District HM1, HB1, DM1, DM3, and Use Districts CX3 and IX2/IX3. The delta between base and bonus in our district is too great, especially when DTLA2040 proposes mandatory inclusionary housing AND a production FAR requirement for new developments.

Do not exclude Creative Office as a qualifying use for the "work" portion of new Live/Work units and allow it to count toward the required FAR in Use Districts IX2/IX3/IX4 Productive Space. The Fashion Industry has been moving towards marrying production space with office. The most significant indicator is Adidas and Spark's entry into the community, bringing 800+ employees; both in what would be a CX3 area.

Remove CUP requirements and prohibitions on adaptive reuse/conversion projects (housing, live/work units, hotels, and social service facilities) in the IX2 and IX3 Use Districts. The adaptive reuse ordinance was meant to address buildings plagued by high vacancy rates that could be reused to address the needs of communities. That has never been truer than in the Fashion District! A building that has sat vacant or

underutilized at a threshold of 60% for 2+ years should be allowed new life/conversion without prohibitions.

Do not impose a minimum FAR requirement for Productive Space in Use District IX2/IX3; allow the Employment Incentive Area (subarea A.5) to be an anchor for production space. The LA Fashion District has been experiencing a production exodus since the late 1990s. While industry regulations have sought rightful equity in manufacturing, this catalyzed many companies to move out of City, State, and Country. Buildings dedicated to manufacturing and wholesale currently have a vacancy rate of 18%.

Allow new residential and residential conversions across all Use Forms (IX2/IX3) in the LA Fashion District. The City is in a housing crisis and experiencing highly unfavorable market conditions. With over 65,000 individuals experiencing homelessness in the city, we cannot prohibit new housing if we are to meet State and City housing goals.

Remove mandatory inclusionary housing requirements and continue incentivizing affordable housing production through the Community Benefits Program. As long as the Hybrid Industrial area is a 3:1 base FAR, it cannot bear mandatory inclusionary housing AND employment space obligations. I

Extend the Restaurant Beverage Area to include the entire Fashion District. Despite COVID-19, the Restaurant Industry has been resilient in our community. Many businesses adapted to take-out or Al Fresco, saving many coveted eateries from closure. Extending the restaurant beverage area will allow these businesses to tap into additional revenue that could help bridge the gap in loss during the height of closures. In addition, it will provide new restaurants with a streamlined alcohol approval process.

As we continue to the transition post-COVID-19, DTLA2040 has the potential to help guide this evolution of the Fashion District and DTLA in a positive direction. I encourage the PLUM committee to ensure that development plans are flexible, inclusive, and equitable to all industries and stakeholders in our neighborhood. Please consider the needs and concerns of the existing communities. You can help ensure the Fashion District remains a vital and dynamic part of the City's fabric for years.

Thank you for your work and attention to this matter.

Sincerely,

Adir Botach  
Abotachmgmt@gmail.com  
1240 S Main Street  
Los Angeles, CA 90015

**Subject:** DTLA 2040 Comments (CF 22-0617)

**Date:** Friday, April 14, 2023 at 6:11:34 AM Pacific Daylight Time

**From:** LA Fashion District BID

**To:** info

April 3, 2023

Dear Planning and Land Use Management Committee (PLUM),

I would like to thank the City Planning Commissioners, the Department of City Planning, City Staff, and the members of this committee for developing the DTLA2040 proposal. As a stakeholder in the LA Fashion District, I want to express my thoughts on the impact that staff recommendations and the Director of Planning's report will have on the future of our community.

The LA Fashion District is a vital economic hub in Downtown Los Angeles, the City at large, and the region. Our neighborhood's DNA is in the fashion and flower industries. We take great pride in and never plan to divest from those identities. However, as the city continues to grow, evolve, and become a melting pot, it is clear that the Fashion District must adapt and change to meet the needs of industries and residents seeking to call our community home.

DTLA2040 has the potential to help guide this evolution in a positive direction. In particular, I am excited by the potential of easing restrictions on daycares/new schools, removing above-grade parking from FAR calculations, increasing the minimum size + removing FAR requirements for live/work units, and opening the door to flexibility for new residential in some areas.

To protect the vitality of the Fashion District, please:

Increase the base FAR to 6:1 in Form District HM1, HB1, DM1, DM3, and Use Districts CX3 and IX2/IX3. The delta between base and bonus in our district is too great, especially when DTLA2040 proposes mandatory inclusionary housing AND a production FAR requirement for new developments.

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Thank you for your work and attention to this matter.

Sincerely,

scott yamabe  
scott@socalflowermarket.com  
755 Wall Street  
Los Angeles, CA 90014

**Subject:** DTLA 2040 Comments (CF 22-0617)

**Date:** Thursday, April 13, 2023 at 11:46:32 AM Pacific Daylight Time

**From:** LA Fashion District BID

**To:** info

April 3, 2023

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I would like to thank the City Planning Commissioners, the Department of City Planning, City Staff, and the members of this committee for developing the DTLA2040 proposal. As a stakeholder in the LA Fashion District, I want to express my thoughts on the impact that staff recommendations and the Director of Planning's report will have on the future of our community.

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Allow new residential and residential conversions across all Use Forms (IX2/IX3) in the LA Fashion District. The City is in a housing crisis and experiencing highly unfavorable market conditions. With over 65,000 individuals experiencing homelessness in the city, we cannot prohibit new housing if we are to meet State and City housing goals.

Remove mandatory inclusionary housing requirements and continue incentivizing affordable housing production through the Community Benefits Program. As long as the Hybrid Industrial area is a 3:1 base FAR, it cannot bear mandatory inclusionary housing AND employment space obligations. I

Extend the Restaurant Beverage Area to include the entire Fashion District. Despite COVID-19, the Restaurant Industry has been resilient in our community. Many businesses adapted to take-out or Al Fresco, saving many coveted eateries from closure. Extending the restaurant beverage area will allow these businesses to tap into additional revenue that could help bridge the gap in loss during the height of closures. In addition, it will provide new restaurants with a streamlined alcohol approval process.

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Thank you for your work and attention to this matter.

Sincerely,

nancy sale  
salenancy@sbcglobal.net  
822 S Los Angeles Street  
LA, CA 90014

**Subject:** DTLA 2040 Comments (CF 22-0617)

**Date:** Thursday, April 13, 2023 at 11:42:59 AM Pacific Daylight Time

**From:** LA Fashion District BID

**To:** info

April 3, 2023

Dear Planning and Land Use Management Committee (PLUM),

I would like to thank the City Planning Commissioners, the Department of City Planning, City Staff, and the members of this committee for developing the DTLA2040 proposal. As a stakeholder in the LA Fashion District, I want to express my thoughts on the impact that staff recommendations and the Director of Planning's report will have on the future of our community.

The LA Fashion District is a vital economic hub in Downtown Los Angeles, the City at large, and the region. Our neighborhood's DNA is in the fashion and flower industries. We take great pride in and never plan to divest from those identities. However, as the city continues to grow, evolve, and become a melting pot, it is clear that the Fashion District must adapt and change to meet the needs of industries and residents seeking to call our community home.

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To protect the vitality of the Fashion District, please:

Increase the base FAR to 6:1 in Form District HM1, HB1, DM1, DM3, and Use Districts CX3 and IX2/IX3. The delta between base and bonus in our district is too great, especially when DTLA2040 proposes mandatory inclusionary housing AND a production FAR requirement for new developments.

Do not exclude Creative Office as a qualifying use for the "work" portion of new Live/Work units and allow it to count toward the required FAR in Use Districts IX2/IX3/IX4 Productive Space. The Fashion Industry has been moving towards marrying production space with office. The most significant indicator is Adidas and Spark's entry into the community, bringing 800+ employees; both in what would be a CX3 area.

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units, hotels, and social service facilities) in the IX2 and IX3 Use Districts. The adaptive reuse ordinance was meant to address buildings plagued by high vacancy rates that could be reused to address the needs of communities. That has never been truer than in the Fashion District! A building that has sat vacant or underutilized at a threshold of 60% for 2+ years should be allowed new life/conversion without prohibitions.

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Sincerely,

nancy sale  
nancysale@sbcglobal.net  
816 S. Los Angeles Street  
Los Angeles, CA 90014

**Subject:** DTLA 2040 Comments (CF 22-0617)

**Date:** Wednesday, April 12, 2023 at 12:28:28 PM Pacific Daylight Time

**From:** LA Fashion District BID

**To:** info

April 3, 2023

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Thank you for your work and attention to this matter.

Sincerely,

John Bulder  
johnandjackieb@msn.com  
938 E Pico  
Los Angeles, CA 90021

**Subject:** DTLA 2040 Comments (CF 22-0617)

**Date:** Wednesday, April 12, 2023 at 12:26:58 PM Pacific Daylight Time

**From:** LA Fashion District BID

**To:** info

April 3, 2023

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Sincerely,

Jacqueline Bulder  
johnandjackieb@msn.com  
1117 E Pico  
Los Angeles, CA 90021

**Subject:** DTLA 2040 Comments (CF 22-0617)

**Date:** Wednesday, April 12, 2023 at 12:25:02 PM Pacific Daylight Time

**From:** LA Fashion District BID

**To:** info

April 3, 2023

Dear Planning and Land Use Management Committee (PLUM),

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Sincerely,

John Bulder  
johnandjackieb@msn.com  
938 E Pico  
Los Angeles, CA 90021

**Subject:** DTLA 2040 Comments (CF 22-0617)

**Date:** Wednesday, April 12, 2023 at 12:23:24 PM Pacific Daylight Time

**From:** LA Fashion District BID

**To:** info

April 3, 2023

Dear Planning and Land Use Management Committee (PLUM),

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Sincerely,

Jacqueline Bulder  
johnandjackieb@msn.com  
938 E Pico  
Los Angeles, CA 90021

**Subject:** DTLA 2040 Comments (CF 22-0617)

**Date:** Tuesday, April 11, 2023 at 4:19:51 PM Pacific Daylight Time

**From:** LA Fashion District BID

**To:** info

April 3, 2023

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Sincerely,

Bridgette Jarrett  
sahaboutique22@gmail.com  
4806 Grovewood Dr.  
Garland, TX 75043

**Subject:** DTLA 2040 Comments (CF 22-0617)

**Date:** Tuesday, April 11, 2023 at 8:13:42 AM Pacific Daylight Time

**From:** LA Fashion District BID

**To:** info

April 3, 2023

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Thank you for your work and attention to this matter.

Sincerely,

Diane H Pappas  
dhpappas@gmail.com

1326 Santee Street Los Angeles, CA

Diane Pappas  
dhpappas@gmail.com

2472 Brigden Rd  
Pasadena, CA 91104

**Subject:** DTLA 2040 Comments (CF 22-0617)

**Date:** Tuesday, April 11, 2023 at 8:00:09 AM Pacific Daylight Time

**From:** LA Fashion District BID

**To:** info

April 3, 2023

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The LA Fashion District is a vital economic hub in Downtown Los Angeles, the City at large, and the region. Our neighborhood's DNA is in the fashion and flower industries. We take great pride in and never plan to divest from those identities. However, as the city continues to grow, evolve, and become a melting pot, it is clear that the Fashion District must adapt and change to meet the needs of industries and residents seeking to call our community home.

DTLA2040 has the potential to help guide this evolution in a positive direction. In particular, I am excited by the potential of easing restrictions on daycares/new schools, removing above-grade parking from FAR calculations, increasing the minimum size + removing FAR requirements for live/work units, and opening the door to flexibility for new residential in some areas.

To protect the vitality of the Fashion District, please:

Increase the base FAR to 6:1 in Form District HM1, HB1, DM1, DM3, and Use Districts CX3 and IX2/IX3. The delta between base and bonus in our district is too great, especially when DTLA2040 proposes mandatory inclusionary housing AND a production FAR requirement for new developments.

Do not exclude Creative Office as a qualifying use for the "work" portion of new Live/Work units and allow it to count toward the required FAR in Use Districts IX2/IX3/IX4 Productive Space. The Fashion Industry has been moving towards marrying production space with office. The most significant indicator is Adidas and Spark's entry into the community, bringing 800+ employees; both in what would be a CX3 area.

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Thank you for your work and attention to this matter.

Sincerely,

SCS Building Fund LLC LLC  
scsbuildingfund@gmail.com  
816 S. Los Angeles Street  
Los Angeles, CA 90014

**Subject:** DTLA 2040 Comments (CF 22-0617)

**Date:** Tuesday, April 11, 2023 at 7:58:59 AM Pacific Daylight Time

**From:** LA Fashion District BID

**To:** info

April 3, 2023

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scsbuildingfund@gmail.com  
822 S. Los Angeles Street  
Los Angeles, CA 90014

**Subject:** DTLA 2040 Comments (CF 22-0617)

**Date:** Monday, April 10, 2023 at 4:08:07 PM Pacific Daylight Time

**From:** LA Fashion District BID

**To:** info

April 3, 2023

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Sincerely,

Mark Chatoff  
Mark@Californiaflowermall.com  
821 San Pedro Street  
Los Angeles, CA 90014

**Subject:** DTLA 2040 Comments (CF 22-0617)

**Date:** Monday, April 10, 2023 at 4:05:37 PM Pacific Daylight Time

**From:** LA Fashion District BID

**To:** info

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Sincerely,

Mark Chatoff  
Mark@californiaflowermall.com  
822 San Julian Street  
Los Angeles, CA 90014

## Communication from Public

**Name:** Katherine McNenny

**Date Submitted:** 04/17/2023 09:02 PM

**Council File No:** 22-0617

**Comments for Public Posting:** I am part of the Skid Row Now & 2040 coalition and I urge you to support the recommendations put forth in our Green Paper (<https://www.lapovertydept.org/skid-row-now-and-2040/>). In particular, please support: Retaining and expanding the IX1 Zone to represent the historical boundaries of Skid Row, from 3rd to 7th Streets and from Main to Alameda Streets. This is a COMMUNITY, with a rich history. It is imperative that that it be recognized as such. Along these lines, the City must help establish a Skid Row district council for self-representation by residents (housed and unhoused) and workers within the historical Skid Row boundaries. Thank you for your consideration.