

Communication from Public

Name: DTLA Stakeholders
Date Submitted: 04/24/2023 08:58 PM
Council File No: 22-0617
Comments for Public Posting: See attached letters

DTLA 2040 - Stakeholder letter

Mitchel Carricart

Postal Code:

Email Address: miatch99@gmail.com

Date of Submission: Fri, 04/21/2023 - 14:54

Submission Letter:

Fri, 04/21/2023 - 14:54

Councilmember de Leon
Council Districts 1 & 14
200 N. Spring Street
Los Angeles, CA 90012

Re: DTLA 2040 Community Plan

Dear Councilmember de Leon,

I'm writing to express my concerns about the DTLA 2040 community plan and how it will impact me as a Downtown LA stakeholder. This plan is crucial for the city's future because it will determine the development standards for the heart of the city for the next two decades and can address the pressing challenges of the housing shortage and homelessness. To meet our needs, Los Angeles must build nearly 500,000 new housing units by 2029, and about half of those should be affordable. DTLA 2040 presents a unique opportunity to address these crises effectively.

I believe that DTLA 2040 should be designed with practical recommendations that prioritize inclusivity, sustainability, and the growth of the hospitality industry. Inclusivity is crucial, and DTLA 2040 can encourage more housing for all income levels by incentivizing affordable housing in all new residential developments consistently across Downtown's neighborhoods.

I am concerned about the current condition of Skid Row, which has been the epicenter of homelessness in the United States and our city. DTLA 2040 should provide strong housing protections for existing affordable housing in Skid Row while allowing for more economically and socially integrated housing. To achieve this mixed income housing should be allowed in Skid Row.

Sustainability is also important, and DTLA 2040 should be designed to promote sustainable growth that has the lowest impact on carbon emissions. The plan should encourage dense housing development near transit by increasing the base floor area ratio (FAR) in certain neighborhoods like the Fashion District and Chinatown and removing site plan review (SPR) as well as building height limitations. Additionally, counting above-grade parking toward FAR within ¼ mile of a metro station should be removed and replaced with stringent design

DTLA 2040 - Stakeholder letter

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Finally, I believe that DTLA 2040 should support Downtown as a world-class destination that creates prosperity for small business owners, entrepreneurs, workers, and the community. This can be achieved by allowing new restaurants to offer beer and wine by implementing the Restaurant Beverage Program (RBP), and removing unnecessary conditional use permit (CUP) requirements for hotels.

Thank you for considering these practical recommendations and partnering with us to ensure that DTLA 2040 supports the continued vibrancy and sustainability of DTLA and provides effective solutions to the housing shortage and homelessness crisis.

Sincerely,
Mitchel Carricart
miatch99@gmail.com

901 S Flower #708

Los Angeles, CA 90015
United States

Cc: Mayor Karen Bass
Honorable Members of the Planning, Land Use and Management Committee

DTLA 2040 - Stakeholder letter

Matt Utsunomiya

Postal Code:

Email Address: matthew.utsunomiya@gmail.com

Date of Submission: Fri, 04/21/2023 - 13:10

Submission Letter:

Fri, 04/21/2023 - 13:10

Councilmember de Leon
Council Districts 1 & 14
200 N. Spring Street
Los Angeles, CA 90012

Re: DTLA 2040 Community Plan

Dear Councilmember de Leon,

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Sincerely,
Matt Utsunomiya
matthew.utsunomiya@gmail.com

641 E Harvard St

Glendale, CA 91205
United States

Cc: Mayor Karen Bass
Honorable Members of the Planning, Land Use and Management Committee

DTLA 2040 - Stakeholder letter

Jessica Yas Barker

Postal Code:

Email Address: jessicayas@gmail.com

Date of Submission: Wed, 04/19/2023 - 10:37

Submission Letter:

Wed, 04/19/2023 - 10:37

Councilmember de Leon
Council Districts 1 & 14
200 N. Spring Street
Los Angeles, CA 90012

Re: DTLA 2040 Community Plan

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Sincerely,
Jessica Yas Barker
jessicayas@gmail.com

22153 Oxnard St.

Woodland Hills, CA 91367
United States

Cc: Mayor Karen Bass
Honorable Members of the Planning, Land Use and Management Committee

DTLA 2040 - Stakeholder letter

Sarah WILTFONG

Postal Code:

Email Address: sarah.wiltfong@bizfed.org

Date of Submission: Wed, 04/12/2023 - 14:55

Submission Letter:

Wed, 04/12/2023 - 14:55

Councilmember de Leon
Council Districts 1 & 14
200 N. Spring Street
Los Angeles, CA 90012

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Sincerely,
Sarah WILTFONG
sarah.wiltfong@bizfed.org

1014 E Carson St, #2

Long Beach, CA 90807
United States

Cc: Mayor Karen Bass
Honorable Members of the Planning, Land Use and Management Committee

DTLA 2040 - Stakeholder letter

Aaron Oliver

Postal Code:

Email Address: aoliver2@berklee.edu

Date of Submission: Thu, 04/06/2023 - 09:30

Submission Letter:

Thu, 04/06/2023 - 09:30

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Council Districts 1 & 14
200 N. Spring Street
Los Angeles, CA 90012

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Sincerely,
Aaron Oliver
aoliver2@berklee.edu

12200 Montecito Rd.

Seal Beach, CA 90740
United States

Cc: Mayor Karen Bass
Honorable Members of the Planning, Land Use and Management Committee

DTLA 2040 - Stakeholder letter

Debby Zhou

Postal Code:

Email Address: deb.zhou@gmail.com

Date of Submission: Wed, 04/05/2023 - 09:29

Submission Letter:

Wed, 04/05/2023 - 09:29

Councilmember de Leon
Council Districts 1 & 14
200 N. Spring Street
Los Angeles, CA 90012

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Sincerely,
Debby Zhou
deb.zhou@gmail.com

645 W 9th St, Apt 714

Los Angeles, CA 90015
United States

Cc: Mayor Karen Bass
Honorable Members of the Planning, Land Use and Management Committee

DTLA 2040 - Stakeholder letter

Jens Midthun

Postal Code:

Email Address: jens.midthun@gmail.com

Date of Submission: Tue, 04/04/2023 - 17:13

Submission Letter:

Tue, 04/04/2023 - 17:13

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Council Districts 1 & 14
200 N. Spring Street
Los Angeles, CA 90012

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Sincerely,
Jens Midthun
jens.midthun@gmail.com

416 S Spring St.

Los Angeles, CA 90013
United States

Cc: Mayor Karen Bass
Honorable Members of the Planning, Land Use and Management Committee

DTLA 2040 - Stakeholder letter

Chris Martinez

Postal Code:

Email Address: chris@vvrealtygroup.com

Date of Submission: Tue, 04/04/2023 - 16:39

Submission Letter:

Tue, 04/04/2023 - 16:39

Councilmember de Leon
Council Districts 1 & 14
200 N. Spring Street
Los Angeles, CA 90012

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Sincerely,
Chris Martinez
chris@vvrealtygroup.com

2202 s Figueroa st unit 124

Los Angeles, CA 90007
United States

Cc: Mayor Karen Bass
Honorable Members of the Planning, Land Use and Management Committee

Communication from Public

Name: DTLA Stakeholders
Date Submitted: 04/24/2023 08:58 PM
Council File No: 22-0617
Comments for Public Posting: See attached letters

DTLA 2040 - Hospitality Focus

Mitchel Carricart

Postal Code:

Email Address: miatch99@gmail.com

Date of Submission: Fri, 04/21/2023 - 14:54

Submission Letter:

Fri, 04/21/2023 - 14:54

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Council Districts 1 & 14
200 N. Spring Street
Los Angeles, CA 90012

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One great new feature of the plan is the "Nightlife Beverage Program" that will make it less costly and more streamlined for new bars and restaurants to open in parts of Downtown. Currently, the plan proposes to only allow that benefit around the Convention Center and LA LIVE, and along parts of Broadway and 7th Street. However, I believe it should be easier to start a hospitality business across all of Downtown. Downtown should be the place where we welcome new ideas and make it as streamlined as possible to start up a new business, particularly for bars and restaurants that are key to making our neighborhoods buzz. I request that you expand the Nightlife Beverage Program to more of Downtown to support small businesses and our growth as a vibrant cultural destination.

Hotels are also crucial to our local hospitality environment, particularly with respect to our Convention Center and LA LIVE, in anticipation of the many major events on the horizon and to bringing in visitors and economic activity that support our neighborhoods. As proposed, the plan would create barriers for hotels in places like the Arts District and Fashion District, which are two of the fastest growing and most exciting areas of Downtown. I ask that you ensure the plan encourages hotel development across Downtown to support tourism and remove hurdles to new hotels in the Arts District and Fashion District.

DTLA 2040 - Hospitality Focus

The hospitality industry is so important to Downtown and the city, and DTLA 2040 is a major opportunity to support this industry. Thank you for considering my comments.

Sincerely,
Mitchel Carricart
miatch99@gmail.com

901 S Flower #708

Los Angeles, CA 90015
United States

Cc: Mayor Karen Bass
Honorable Members of the Planning, Land Use and Management Committee

DTLA 2040 - Hospitality Focus

steve saffold

Postal Code:

Email Address: stevesaffold@gmail.com

Date of Submission: Fri, 04/07/2023 - 13:05

Submission Letter:

Fri, 04/07/2023 - 13:05

Councilmember de Leon
Council Districts 1 & 14
200 N. Spring Street
Los Angeles, CA 90012

Re: DTLA 2040 Community Plan

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DTLA 2040 - Hospitality Focus

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Sincerely,
steve saffold
stevesaffold@gmail.com

516 Hanley Place

Los Angeles, CA 90049
United States

Cc: Mayor Karen Bass
Honorable Members of the Planning, Land Use and Management Committee

Communication from Public

Name: DTLA Stakeholders
Date Submitted: 04/24/2023 08:59 PM
Council File No: 22-0617
Comments for Public Posting: See attached letters

DTLA 2040 - Housing Focus

Alexander Thomas

Postal Code:

Email Address: alexanderdanielthomas@gmail.com

Date of Submission: Fri, 04/21/2023 - 19:02

Submission Letter:

Fri, 04/21/2023 - 19:02

Councilmember de Leon
Council Districts 1 & 14
200 N. Spring Street
Los Angeles, CA 90012

Re: DTLA 2040 Community Plan

Dear Councilmember de Leon,

I am pleased to see the DTLA 2040 community plan finally moving forward to the Planning and Land Use Management Committee (PLUM). This plan has been ready for consideration at PLUM since September 2022 and now must be approved by the City Council by May 12 or it is deemed denied and must start anew. This is a tight timeline for a significant city policy like DTLA 2040. This plan will be the first to implement the City's new zoning code and the plan area accounts for 20% of the City's new housing growth through 2040. I ask that you thoughtfully consider DTLA 2040 and the impact it will have on housing production and our City's future.

Graduated Inclusionary Zoning is being recommended by City Planning for DTLA 2040 and this approach combines a requirement for affordable housing with a community benefits program. To make sure housing developments are economically viable under this model, I ask that you clarify that new residential projects in DTLA 2040 be exempt from the Affordable Housing Linkage Fee. This is consistent with City Planning's recommendations, and I encourage your support.

Adaptive Reuse has played a leading role in DTLA's growth and can continue to be an important tool to create housing and repurpose existing buildings for new use. At the direction of the City Planning Commission, the City Planning Department worked with an independent consultant to study the financial feasibility of including affordable housing requirements in adaptive reuse projects. The consultant concluded that projects would be infeasible with these requirements and I ask that you heed these findings. Notably, projects would still pay the Affordable Housing Linkage Fee and thereby continue to support the creation of affordable housing. I support the approach to maximize the feasibility of adaptive reuse and hope you will too.

As the City has undertaken this major initiative to update DTLA's zoning code so

DTLA 2040 - Housing Focus

there is a clear framework for sustainable growth, I ask that you remove Site Plan Review which runs counter to this goal. As Mayor Bass has recognized with Executive Directive No. 1 that removes Site Plan Review for affordable housing, Site Plan Review is a barrier to dense housing. We should discourage housing with Site Plan Review in the most walkable and transit-rich neighborhood of the city.

Finally, I also ask for the plan to not punish projects with above-grade parking. This could reduce the amount of new housing that can be built, result in longer construction times, increased emissions and ultimately more expensive housing. We ask that counting above-grade parking toward FAR be removed and replaced with stringent design requirements including the ability to adopt parking to other uses in the future as market conditions change.

Housing is the most important issue that DTLA 2040 can meaningfully address and we must do all we can to make this plan successful. Thank you for your consideration.

Sincerely,
Alexander Thomas
alexanderdanielthomas@gmail.com

641 E Harvard St

Glendale, CA, CA 20016
United States

Cc: Mayor Karen Bass
Honorable Members of the Planning, Land Use and Management Committee

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DTLA 2040 - Housing Focus

there is a clear framework for sustainable growth, I ask that you remove Site Plan Review which runs counter to this goal. As Mayor Bass has recognized with Executive Directive No. 1 that removes Site Plan Review for affordable housing, Site Plan Review is a barrier to dense housing. We should discourage housing with Site Plan Review in the most walkable and transit-rich neighborhood of the city.

Finally, I also ask for the plan to not punish projects with above-grade parking. This could reduce the amount of new housing that can be built, result in longer construction times, increased emissions and ultimately more expensive housing. We ask that counting above-grade parking toward FAR be removed and replaced with stringent design requirements including the ability to adopt parking to other uses in the future as market conditions change.

Housing is the most important issue that DTLA 2040 can meaningfully address and we must do all we can to make this plan successful. Thank you for your consideration.

Sincerely,
Mitchel Carricart
miatch99@gmail.com

901 S Flower #708

Los Angeles, CA 90015
United States

Cc: Mayor Karen Bass
Honorable Members of the Planning, Land Use and Management Committee

DTLA 2040 - Housing Focus

Thomas Irwin

Postal Code:

Email Address: thomasirwin13@gmail.com

Date of Submission: Tue, 04/18/2023 - 15:38

Submission Letter:

Tue, 04/18/2023 - 15:38

Councilmember de Leon
Council Districts 1 & 14
200 N. Spring Street
Los Angeles, CA 90012

Re: DTLA 2040 Community Plan

Dear Councilmember de Leon,

I am pleased to see the DTLA 2040 community plan finally moving forward to the Planning and Land Use Management Committee (PLUM). This plan has been ready for consideration at PLUM since September 2022 and now must be approved by the City Council by May 12 or it is deemed denied and must start anew. This is a tight timeline for a significant city policy like DTLA 2040. This plan will be the first to implement the City's new zoning code and the plan area accounts for 20% of the City's new housing growth through 2040. I ask that you thoughtfully consider DTLA 2040 and the impact it will have on housing production and our City's future.

Graduated Inclusionary Zoning is being recommended by City Planning for DTLA 2040 and this approach combines a requirement for affordable housing with a community benefits program. To make sure housing developments are economically viable under this model, I ask that you clarify that new residential projects in DTLA 2040 be exempt from the Affordable Housing Linkage Fee. This is consistent with City Planning's recommendations, and I encourage your support.

Adaptive Reuse has played a leading role in DTLA's growth and can continue to be an important tool to create housing and repurpose existing buildings for new use. At the direction of the City Planning Commission, the City Planning Department worked with an independent consultant to study the financial feasibility of including affordable housing requirements in adaptive reuse projects. The consultant concluded that projects would be infeasible with these requirements and I ask that you heed these findings. Notably, projects would still pay the Affordable Housing Linkage Fee and thereby continue to support the creation of affordable housing. I support the approach to maximize the feasibility of adaptive reuse and hope you will too.

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DTLA 2040 - Housing Focus

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Sincerely,
Thomas Irwin
thomasirwin13@gmail.com

3449 Ellison St

Los Angeles, CA 90063
United States

Cc: Mayor Karen Bass
Honorable Members of the Planning, Land Use and Management Committee

DTLA 2040 - Housing Focus

Szi Kiat Lee

Postal Code:

Email Address: lsk0721thg@gmail.com

Date of Submission: Tue, 04/18/2023 - 11:19

Submission Letter:

Tue, 04/18/2023 - 11:19

Councilmember de Leon
Council Districts 1 & 14
200 N. Spring Street
Los Angeles, CA 90012

Re: DTLA 2040 Community Plan

Dear Councilmember de Leon,

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DTLA 2040 - Housing Focus

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Sincerely,
Szi Kiat Lee
lsk0721thg@gmail.com

3561 Clarington Ave, Apt 310

Los Angeles, CA 90034
United States

Cc: Mayor Karen Bass
Honorable Members of the Planning, Land Use and Management Committee

DTLA 2040 - Housing Focus

Debby Zhou

Postal Code:

Email Address: deb.zhou@gmail.com

Date of Submission: Wed, 04/05/2023 - 09:30

Submission Letter:

Wed, 04/05/2023 - 09:30

Councilmember de Leon
Council Districts 1 & 14
200 N. Spring Street
Los Angeles, CA 90012

Re: DTLA 2040 Community Plan

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I am pleased to see the DTLA 2040 community plan finally moving forward to the Planning and Land Use Management Committee (PLUM). This plan has been ready for consideration at PLUM since September 2022 and now must be approved by the City Council by May 12 or it is deemed denied and must start anew. This is a tight timeline for a significant city policy like DTLA 2040. This plan will be the first to implement the City's new zoning code and the plan area accounts for 20% of the City's new housing growth through 2040. I ask that you thoughtfully consider DTLA 2040 and the impact it will have on housing production and our City's future.

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DTLA 2040 - Housing Focus

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Sincerely,
Debby Zhou
deb.zhou@gmail.com

645 W 9th St, Apt 714

Los Angeles, CA 90015
United States

Cc: Mayor Karen Bass
Honorable Members of the Planning, Land Use and Management Committee

Communication from Public

Name:

Date Submitted: 04/24/2023 03:23 PM

Council File No: 22-0617

Comments for Public Posting: It's important to me that the City Commission makes supporting small businesses a priority in Downtown moving forward because small businesses are the backbone of a neighborhood and contribute to the cultural richness and heritage of LA. These small businesses really are what make the neighborhood unique and special and connect the younger generations to the past and specifically for Little Tokyo, the Japanese culture. Supporting small businesses has allowed me to ENSURE MY COMMUNITY'S LEGACY CONTINUES as one of the oldest Japan towns in the country and I want my small businesses to be supported through programs and incentives because I want Little Tokyo to be here for another 100 years. The plan that you are considering addresses many of the issues we're facing, but it can do more. I ask that the commissioners please adopt the policies put forth by Central City United so that Downtown Los Angeles can create more opportunities for small businesses to thrive so that more small business supporters like me can continue to work and contribute to the rich culture of Los Angeles. As DTLA gentrifies, it's important to preserve what made this city so unique in the first place and having all of these cultural and historic neighborhoods in one city is something that is very special and should be protected.

April 24, 2023

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

RE: [CF 22-0617] – Downtown LA Community Plan Update 2040

Dear Councilmembers,

I submit this letter in support of the Central City United (CCU) Coalition's comments and policy recommendations that would ensure that the Downtown LA Community Plan will promote equity and justice throughout downtown. I also share CCU's appreciation for the Planning Department and the City Planning Commission for their role in drafting and advancing a plan that incorporates many of the community-centered policy recommendations put forth by CCU.

CCU is multi-neighborhood coalition led by Little Tokyo Service Center (LTSC), the Los Angeles Community Action Network (LA CAN), and the Southeast Asian Community Alliance (SEACA), as key organizations embedded in Little Tokyo, Skid Row, and Chinatown, along with Public Counsel. CCU formed to lift up the voices and concerns of Downtown's poorest and most vulnerable residents and stakeholders in the community plan update process.

As the City continues to grapple with institutional racism and structural injustice, I 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 a tool 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. To advance an even more inclusive and equitable Downtown Community Plan, I ask the City to adopt the following changes recommended by CCU, and to approve and pass the Plan by May 12. Any delay not only creates uncertainty, but puts us in violation of state housing law, preventing us from addressing the housing crisis that plagues our city.

- 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 Downtown 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,

A handwritten signature in black ink, appearing to read 'Megan Teramoto', with a stylized, cursive script.

Megan Teramoto
Little Tokyo Stakeholder

Communication from Public

Name: zachary rutland

Date Submitted: 04/24/2023 12:24 PM

Council File No: 22-0617

Comments for Public Posting: To the Planning and Land Use Committee Please retain and expand the proposed IX1 zone as proposed by the Skid Row Now and 2040 coalition. As a stake holder in district 1, I am advocating for the approval of the IX1 and it's expansion - which will protect affordable housing in Skid Row as well as small business. By eliminating the zone, many people will be displaced from housing and businesses shut down.

Communication from Public

Name: Focc Oprah Goody

Date Submitted: 04/24/2023 11:24 AM

Council File No: 22-0617

Comments for Public Posting: retain and expand the ix1 zone to represent the historical boundaries of skid row, from 3rd to 7th streets and from main to Alameda streets. establish a skid row district council for self-representation by residents (houses and unhoused) and workers within the historical skid row boundaries. advocate for elements of dtla 2040 that foster a healthy and sustainable skid row neighborhood. support the recommendation of the central city united coalition.

Communication from Public

Name: Megan Ramsey

Date Submitted: 04/24/2023 11:51 AM

Council File No: 22-0617

Comments for Public Posting: I'm writing in to you today to plead with you expand the IX1 Zone to the full boundaries of Skid Row: from 3rd to 7th St and Main to Alameda St. As politicians claim they have interests in "solving the homelessness crisis" we are seeing more and more people being forced to move to the streets, living under freeways, along medians, and in any spare bit of public place they can find because they have no other options. Skid Row has historically been a place for those with limited options to find extremely affordable housing. It has been a baseline, but is not enough, and we need more - as anyone who has walked or driven the streets of LA could tell you. The solution is obvious. I have been working at the Los Angeles Catholic Worker soup kitchen in Skid Row for 7 years. There are people that have been waiting for housing the whole 7 years I have known them. In the meantime, they are forced either to give up their entire lives and freedom to hustle for a shelter bed each night or to give up their security and access to plumbing and electricity and sleep on the sidewalks of Skid Row. By not expanding the IX1 Zone, we are failing to use what resources we have to solve the problem we have. As costs of living rises in LA, we need to continue to create affordable housing that those on fixed incomes can actually afford. And we need to keep people close to the supportive resources they require to manage their lives. The solution is so obvious, I'm sure you don't need my public comment, please make the right choice for the people of LA, especially those forced out into the street, for the people of Skid Row.

Communication from Public

Name: Michael Stars and Suzanne Lerner

Date Submitted: 04/24/2023 12:58 PM

Council File No: 22-0617

Comments for Public Posting: Please see attached letter.



April 24, 2023

Los Angeles City Hall
200 N. Spring Street, Room 450
Los Angeles, CA
90012

Re: LA's Garment Industry and the Downtown Los Angeles 2040 Community Plan

Dear Councilmembers,

Michael Stars supports the Garment Worker Center modifications for the DTLA 2040 Community Plan to preserve, protect and incentivize this essential industry. The garment industry in Los Angeles is ***the second largest manufacturing industry in Los Angeles and largest apparel producing hub in the United States, with a history in Downtown LA going back over 130 years. Our company utilizes many contractors – including cutting, sewing and dyeing – and a long time showroom in DTLA.***

The **DTLA 2040 Community Plan** and the zoning and land use changes it proposes will impact thousands of garment industry businesses and their employees within the DTLA Fashion District, as well as the countless neighboring businesses & sectors that support and work with these businesses on a regular basis. Within the Fashion District, the DTLA 2040 Plan proposes a drastic shift in land use from largely manufacturing zones, to primarily 'Markets' and 'Hybrid Industrial' designations, both of which allow for a significant restructuring of the Fashion District's urban form. The consequences of these strategies on the garment sector, an estimated 20,000 jobs, thousands of small businesses, and the Fashion District's immigrant, low wage workers of color cannot be understated. The infiltration of market rate housing through the DTLA 2040 Plan is of particular concern, as it will significantly raise land values within the area. By applying Market and Hybrid Industrial zoning designations over much of the Fashion District, the DTLA 2040 Plan incentivizes commercial landlords to displace garment manufacturing businesses to create unaffordable, market-rate housing.

The Fashion District should be understood and celebrated as a lively and growing ecosystem that provides the critical infrastructure needed to protect public health and ensure the industry's growth in sustainable production. This requires proximity to the largest concentration of skilled garment workers in the United States, who have on average over 21 years of experience, and affordable manufacturing and industrial spaces for fabric and garment manufacturing, assembly, finishing, warehousing, and distribution processes. LA leads domestically - accounting for 82.5% of California's and 83% of the nation's cut & sew apparel sales¹. LA's fashion industry produces an estimated \$15 billion worth of products each year, according to the California Fashion Association². The displacement of the businesses that make up this ecosystem and the jobs they provide will have a devastating impact on the future of the domestic apparel industry and

¹ BizMiner, "Industry Market Report: NAICS [3152]," 2021.

² Clark, Gino. "California Style: Financing the West Coast's Apparel Industry" Sep 1 2022

<<https://www.mannpublications.com/fashionmannuscript/2022/09/01/california-style-financing-the-west-coasts-apparel-industry/>>



would be a huge set back to these recent gains for the industry at large. **We support the solutions proposed by the Garment Worker Center to remedy these problems within the DTLA 2040 plan and to ensure the long-term viability of LA's unique and essential garment sector, outlined below and detailed in a separate letter previously submitted to the Council File by the GWC in February of 2023.**

Preservation

We recommend the preservation of the Fashion District neighborhood as a localized urban manufacturing employment hub & ecosystem, by ensuring garment manufacturing uses remain permitted throughout the district, with no loss of the jobs or businesses that make up the largest apparel producing industry in the United States. It is critical to maintain accessibility to these jobs for the workers who rely on public transportation in their commutes. Vital to ensuring these jobs persist is a built environment which allows for ease in the movement of goods and materials within and between these businesses, and dedicated, affordable manufacturing and industrial spaces for garment manufacturing, assembly, finishing, warehousing, and distribution processes.

- 1) To help curb displacement of garment jobs, create and enforce a retroactive “lookback” going back 5 years to identify if manufacturing uses have occupied a portion of any building or lot before permitting a change of use.
- 2) Identify and allocate resources to an appropriate entity to assess small business displacement risk as a result of redevelopment and support any displaced small businesses in the Fashion District when displacement cannot be prevented.
- 3) Require the preservation of freight elevators, loading docks, and loading bays within and directly surrounding buildings currently occupied by garment manufacturing businesses.
- 4) Require 1.5 FAR of manufacturing space for all new, residential and non-residential developments in mixed use areas of the Fashion District.
- 5) Identify and allocate resources to an appropriate entity to enforce FAR requirements before leasing is approved.

Protection

We recommend the protection of DTLA's garment manufacturing jobs and this local ecosystem from displacement due to real estate speculation and climbing rents as a result of the introduction of new & competitive uses within the Fashion District. We seek the prioritization of the development of affordable housing at “Very Low”, “Extremely low”, and “Acutely Low” income levels within the Fashion District through strong community benefits agreements and within Adaptive Reuse and Live/Work programs.

- 6) In the Western proposed IX2 use designation within the Fashion District, change use designation from IX2 to IX3.
- 7) Expand Planning's proposed Community Plan Implementation Overlay (CPIO) A.5 Employment Incentive Subarea in the Fashion District throughout the entire IX3 use



- designation, as well as IX2, IX4, and CX3 use designations within the Fashion District to promote and incentivize developers to create new light manufacturing space.
- 8) Prohibit hotels in IX2, IX3, IX4, CX3, I1, & I2 use designations within the boundaries of the Fashion District.
 - 9) Affordability requirements must remain in the Downtown Adaptive Reuse provisions.
 - 10) Strengthen requirements for conversion of manufacturing space into Joint Living & Work Quarters, and limit “work” uses to ensure a focus on garment manufacturing.
 - 11) In IX2, IX3, + IX4 use designation areas within the Fashion District, prohibit entertainment, recreation, and stadium uses from being developed or converted from industrial uses:
 - 12) Prohibit the off-site construction of affordable housing units for developments in Fashion District.

Incentivize

We recommend that city leaders collaborate across departments and offices to create opportunities to provide various financing tools that attract and incentivize mission-driven urban manufacturing developers in order to help preserve existing and create new manufacturing jobs downtown that employ local Angelenos, and revitalize this sector and neighborhood.

- 13) Facilitate and support partnerships between the City’s Workforce Development Board, Economic & Workforce Development Department, and proven industry-specific organizations and labor groups like Garment Worker Center to develop, pilot, and fund Los Angeles fashion manufacturing programming aimed at preserving employment opportunities, increasing economic impact and job creation, as well as uplifting and growing ethical and sustainable garment manufacturing jobs for garment workers in Los Angeles.
- 14) Facilitate links with established retail banks, community development financial institutions, and credit unions, and federal, state, and local funding opportunities which create access to capital to drive recovery for the garment industry.

At this time, we ask that the voices of the workforce and the very businesses that actually define and characterize the area triumph. This land use proposal is an important opportunity to redirect the systemic inequities garment workers face and engage this historically underrepresented population in the planning process. We urge you to do right by the community of garment workers and small businesses who were essential in protecting us from the onset of the pandemic.

Sincerely,

Suzanne Lerner,
CEO + Co-Founder of Michael Stars

Communication from Public

Name: Coach Ron

Date Submitted: 04/24/2023 01:25 PM

Council File No: 22-0617

Comments for Public Posting: As a 15 years resident of World Famous Skidrow Community and member of the DTLA 20/40- I support IX1 zone affordable housing and local local hiring Workforce Development that plan will bring skid row community

Communication from Public

Name: Michael LoGrande
Date Submitted: 04/24/2023 01:42 PM
Council File No: 22-0617
Comments for Public Posting: See letter attached

April 17, 2023

Planning and Land Use Management Committee
Los Angeles City Council
c/o City Clerk
200 North Spring Street
Los Angeles, CA 90012-2601

Re: Draft DTLA 2040 Supplemental Report (March 30, 2023)

Dear Chair Harris-Dawson and Honorable Councilmembers:

As a longtime stakeholder in the Arts District, I am encouraged by many of DTLA 2040's components as it relates to the Arts District. The plan recognizes the Arts District's unique position in the City and the need to safeguard our community's values.

I have also been most pleased to see the recent progress being made on the EIR for Metro's planned extension of a heavy passenger rail line to 6th Street in the Arts District. Extending a rail line to the heart of the Arts District will further connect our community to the rest of the City without the need to rely on private cars. I welcome Metro's investment and encourage the City to consider this coming infrastructure as part of its planning efforts for the Arts District in Downtown. This is specifically why I write today.

Metro's proposed transit extension would place a new rail station on Mesquit Street between the 6th and 7th Street bridges. This area, like much of the Arts District, has seen many recent changes with the introduction of new commercial office buildings and residential. This ongoing transformation, however, may be stunted by unnecessary discriminatory treatment of the properties between these two bridges that front the 200-foot wide swath of railroad tracks that line the Los Angeles River through this part of Downtown. See the highlighted properties on the attached draft zoning map. The maroon color is the MM1 zone, the adjacent purple is the railroad tracks to the east, and the dotted area is the Los Angeles River.

Based on my review of the plan, no other privately owned properties that abut the existing railroad tracks are being zoned in this manner. Specifically, the City's proposed zoning would zone these properties MM1. These properties should be zoned MB3, like all the surrounding properties.

The difference between the MM1 zone and MB3 zone is meaningful.

-- MB3 has no river setbacks. The MM1 zone, however, has a 20-foot "river setback." This makes no sense when these properties are already setback 200 feet from the river.

-- MB3 has no height limits. The MM1 zone limits heights to 15 stories. This also makes no sense when these properties sit immediately adjacent to Metro's proposed station and are already setback 200 feet from the river.

-- The MB3 zone permits a Bonus FAR of up to 6.0 to 1. The MM1 only allows for a Bonus FAR of 4.5 to 1. Again, this makes no sense given the location next to a proposed Metro station.

I and my fellow Arts District stakeholders have worked hard to curate a neighborhood and community that continues to serve as the City's creative hub and is flexible enough to grow with the City's ongoing evolution. The proposed MM1 zoning for these properties is contrary to our efforts.

I respectfully ask that your Committee modify the zoning for these properties to be MB3, consistent with the immediately surrounding properties and similarly situated properties along the railroad tracks, and to support Metro's goals of a transportation hub in the Arts District.

Thank you very much for your consideration.

Best Regards,

Communication from Public

Name: Letter to PLUM re DTLA 2040 Letter
Date Submitted: 04/24/2023 02:11 PM
Council File No: 22-0617
Comments for Public Posting: CF-22-0617; Downtown Los Angeles Community Plan Update/2040 (“Community Plan Update”)



Gonzales Law Group, APC

707 Wilshire Boulevard Suite 4350 | Los Angeles, CA 90017
Telephone: 213.279.6965 | Facsimile: 213.402.2638
www.gonzaleslawgroup.com

Michael Gonzales

E-mail: mike@gonzaleslawgroup.com

April 24, 2023

VIA EMAIL ONLY

Planning and Land Use Management Committee
Los Angeles City Council
City Hall, Room 395
Los Angeles, CA 90012

**RE: CF-22-0617; Downtown Los Angeles Community Plan Update/2040
("Community Plan Update")**

Honorable Council Members:

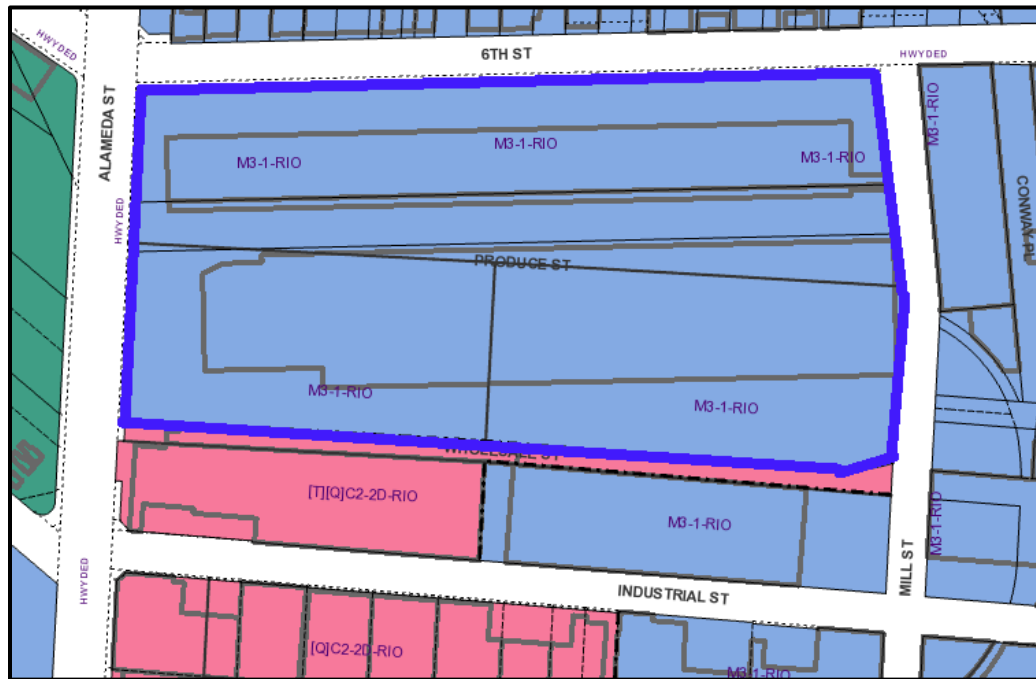
This firm represents Alameda Studio Owner, LLC ("ASOLLC") the owner of that approximately 14.6-acre parcel of real property located generally at the southeast corner of Alameda Street and 6th Street and identified as Assessor's Parcel No. 5164-010-003, 5164-010-004 and 5164-010-005 (the "Property").

The Property is depicted in Figure 1, below. The Property is in the Central City North Community Plan, which is included in the Community Plan Update that will be before this Committee in the near future. We applaud Los Angeles Department of City Planning ("LADCP") Staff on their challenging work and tremendous efforts moving the Community Plan Update closer to approval. Downtown Los Angeles needs a forward-thinking plan and implementing zoning code. ASOLLC is supportive of the Community Plan Update's adoption.

ASOLLC acquired the Property with a vision to develop a state-of-the-art world class production studio campus that includes soundstage uses, production support uses and production support office all on a single campus (the "Project"). To that end, ASOLLC has filed an application with LADCP requesting approval of a Vesting Conditional Use Permit for a Major Development Project, Site Plan Review, and a Vesting Tentative Tract Map (the "Vesting Application") for the Project.¹

¹ LADCP Case Nos. CPC-2022-5829-CU-SPR and VTT-83917 filed on August 15, 2022.

FIGURE 1



(Courtesy of City of Los Angeles ZIMAS Mapping)

The Project was designed with the Community Plan Update and proposed new zoning code in mind. Even though not currently applicable, the Project complies with many of the regulations set forth in the Community Plan Update's proposed new zoning code. For example, the Project's mix of uses (soundstages, production support and supporting office) are permitted by-right. The Project's proposed Floor Area Ratio ("FAR") will not exceed the proposed 1.5 FAR maximum. The Project will not exceed the proposed 90 percent maximum lot coverage as required by the newly proposed code. All Project buildings comply with the proposed zoning code's Primary and Side Build-to-Depth. The Project will also promote pedestrian activity in the immediate surrounding area, a primary goal of the Community Plan Update and the implementing zoning code, by creating a major employment center within walking distance of the Arts District and other surrounding mixed-use communities, such as the Row DTLA, as well as implementing landscaping at points along its frontage. Additionally, all Project buildings comply with the proposed zoning code's Build-to-Width requirements. Accordingly, the Project as designed complies with many of the proposed zoning code's provisions.

As a soundstage production campus, however, the Project must take security seriously for its future tenants, actors, actresses, and various productions. This paramount security concern requires a Project design that provides a feeling of safety and sanctuary within the Project's campus. A few of the proposed zoning code's requirements are not conducive to a safe and secure production studio campus. Nevertheless, ASOLLC is conscious of the Property's special location within the growing Art's District and the importance of designing a project that engages

with the public realm and the Art's District community. Achieving the fine balance between these two contrasting goals is not a simple task.

One example of such a necessary balance that must be found between DTLA 2040 and the Project's security needs is the amenity space requirement. The proposed zoning code requires 15 percent of the lot area as amenity space and requires public accessibility to 75 percent of the amenity space. However, soundstage production activities must remain safe and secure to facilitate production and use by the motion picture industry. Publicly accessible production lots are simply a nonstarter for the entire industry for obvious safety and privacy concerns. Similarly, the proposed zoning code requires publicly accessible pedestrian passageways that a soundstage production campus cannot accommodate. The Project cannot be built with publicly accessible walkways while attracting the motion picture industry, as privacy is one of the primary concerns of any production company when selecting a space for soundstage production.

Similarly, the proposed zoning code has a transparency requirement that is inconsistent with a production soundstage campus and the need to keep all soundstages private. The zoning code designates the property as a "Daylight Factory" frontage district, which requires properties to have a certain percentage of window transparency on street-facing frontages, publicly accessible doorways that are street-facing, front yard fencing height limitations, among a host of additional regulations that would render any building in compliance with the frontage district regulations wholly incompatible as a production soundstage. The Project simply cannot comply with these frontage requirements and remain a production soundstage. In addition to the soundstages, the Project proposes office structures along 6th Street, Alameda Street and Mills Street. These offices can comply with the transparency requirements, while soundstages must remain dark for studio uses and cannot incorporate the frontage district's transparency requirements for lighting and sound proofing purposes. Nevertheless, to the extent feasible, the Project has incorporated transparency and street-facing entrances, but cannot do so for the entirety of its frontage.

Finally, the proposed zoning code imposes a minimum building break requirement of 25-feet and a max building width of 280 feet. The Project satisfies or exceeds this break requirement at various locations. However, due to a soundstage production campus' unique needs, the Project cannot satisfy this requirement at all breaking locations without sacrificing valuable production studio space, nor can the Project meet the maximum 280 feet building width at all points due to the sheer size of production studios and the simple math of fitting a number of large studios buildings on one lot. To this extent, the Project's architect has been mindful of the proposed zoning code's various elements and has strived to achieve compliance with those elements to the extent feasible, even though they are not currently applicable.

ASOLLC is excited to deliver a new soundstage production campus in the heart of the Art's District. The Project assists in retaining entertainment jobs, and continued growth within the Art's District. As demonstrated above, the Project complies with many components of the Community Plan Update's proposed zoning code. The Project has been designed to balance the

unique security needs of a soundstage production campus while engaging the pedestrian environment as much as possible. Swimming against the grain, the Project defies the perception of a monolithic pedestrian hostile movie studio and engages the public realm along all street facing frontages. ASOLLC looks forward to LADCP's processing the Project's Vesting Application and continued engagement with the Art's District community.

Very truly yours,

A handwritten signature in dark ink, appearing to read 'MG', is positioned above the printed name.

Michael Gonzales
Gonzales Law Group APC

Communication from Public

Name: Dana A Sayles

Date Submitted: 04/24/2023 02:47 PM

Council File No: 22-0617

Comments for Public Posting: While we appreciate all of the hard work that has been put into the DTLA 2040 plan, the proposed zoning is cumbersome. As someone who has made a career out of understanding the deep intricacies of the LAMC, the proposed new zoning ordinance requires a PHD to read and understand, despite the presentation claims that this will make zoning easier in downtown. I urge the City Council to take a very hard look at this proposal and whether maintenance of the city's traditional zones (R, C, M) with CPIO and other design standards is a better long term zoning strategy for Downtown LA as well as future community plans that will unfortunately follow this model.