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## Public Comments Not Uploaded DTLA 2040 Comments (CF 22-0617)

1 message

LA Fashion District BID &lt;jasmine@fashiondistrict.org&gt;

Tue, May 2, 2023 at 2:11 PM

Reply-To: clerk.plumcommittee@lacity.org

To: clerk.plumcommittee@lacity.org

May 1, 2023

Dear Planning and Land Use Management Committee (PLUM),

As a stakeholder in the Downtown, I want to express my following thoughts on the Director of Planning's report will have on the future of our community:

- DTLA 2040 should provide as much flexibility as possible for buildings to change and convert to new uses. Projects in Downtown should not be subject to Site Plan Review – we want to encourage more housing and innovative design. There should be no reason for projects to have unnecessary extra review and delays if they otherwise comply with zoning.
- Requiring hotels to get CUPs goes against the City's long standing tourism policies including a goal of 8,000 hotel rooms near the Convention Center and the Tourism Master Plan. Requiring CUPs for hotels is a dramatic policy change that has not had any public discussion. I ask that the plan be changed to encourage hotel development across Downtown.
- Living closer to work assists with traffic and better economics for workers. The Fashion District is projected to provide 12,000 new housing units, 2,000 of which would be rent- restricted affordable units. This is a critical area to address our housing crisis, but this can only happen if projects are financially feasible. Requirements for productive space, loading docks, and freight elevators are prohibitive.
- Increasing the minimum size, removing FAR requirements for live/work units, and opening the door to flexibility for new residential in some areas are steps in the right direction.
- 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. 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%.

- Remove mandatory inclusionary housing requirements and continue incentivizing affordable housing production through the Community Benefits Program. If the Hybrid Industrial area is a 3:1 base FAR, it cannot bear mandatory inclusionary housing *and* employment space obligations.
- Extend the Restaurant Beverage Area to include the entire Fashion District. Despite COVID-19, the Restaurant Industry has been resilient in parts of Downtown. Many businesses adapted to take-out or Al Fresco, saving many coveted eateries from closure.

As we continue to the transition post-COVID-19, DTLA2040 has the potential to help guide this evolution of 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.

Thank you for your work and careful consideration.

Sincerely,  
Blair Besten

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