

Los Angeles City Planning
Attn: Brittany Arceneaux, City Planner
RE: Remarks to the Draft of the Downtown Community Plan Update
07 December 2020

Dear Brittany,

As an architect working within Los Angeles for 8 years, I would like to express my concerns about the current draft of the Downtown Community Plan Update and the Code recommendations for Recode LA 2040. The website states the following:

"Several years ago, City Planning set out to create a modern and efficient zoning system for Los Angeles. The proposed approach aims to establish a new Zoning Code that is more responsive to the needs of Los Angeles's neighborhoods, in addition to being easier to use."

These are noble goals, but the current draft of the code does not show itself to be more responsive to local needs, nor is it easier to use.

The current draft encourages specific distinction between neighborhoods and their current or perceived cultural affiliations. This distinction freezes a location in time and prohibits the future evolution of these areas. This will ultimately result in the perpetuation of a fake architectural representation to gain city approval. The creation of specific development standards in each district will only create confusion and contradiction which will lead to the increased reliance on interpretation from the governing bodies. A greater reliance on interpretation and conversation between differing jurisdictions will slow decisions and make approval times longer. A current example is where balconies and non-flat roof lines are prohibited in the Arts District because it is deemed not reflective of the industrial area. This is nonsensical, and is not reflective of the current building stock in the district. To make something like balconies a discussion topic is a waste of everyone's time. Balconies in residential projects are common design element and meet a market demand, to put restrictions on such a thing will stop development. Furthermore, prescribing roof lines limits function and architectural expression, and should not be dictated by code.

The current drafts for use and density are too specific and all point to increased costs for development to occur. The Hybrid Industrial District in particular has too many development standards that will ultimately put a cap on interest in creating housing in this area because the minimum unit size, material and physical form requirements will be too expensive to implement. As a result, development will occur in other cities with more favorable and realistic conditions. The draft also points to recommended programmatic uses for the interior of the building. No part of a planning code should have jurisdiction in what happens on the interior organization or design of a structure.

All great cities in the world have evolved through changing economic and cultural demands brought on over the course of time. Planned communities have never resulted in diverse and compelling solutions. A form-based code only creates conditions of conformance and sameness, not diversity and vibrance. Implementing code to "protect" a neighborhood that was borne from a lack of those very limitations is at odds with the march of civilization.

We strongly believe that the current draft needs further study and input from the professional design and development community prior to adoption. The draft analysis of the Downtown, Arts District, Little Tokyo, and Chinatown districts in particular need to be reconsidered and not be defined by transitory cultural associations, a form-based code or by prescribed use requirements that will not evolve over time to reflect the community that it serves.

Los Angeles deserves a code that allows for change and evolution and does not preclude certain economic realities needed for growth.

Sincerely,

Chris Carlton, Senior Designer at Shimoda Design Group

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File No. 053646-0004

December 4, 2020

BY EMAIL

Mr. Craig Weber
Principal City Planner & Division Head
Community Planning
Department of City Planning
200 N. Spring St
Los Angeles, CA 90012

Re: 670 Mesquit Project: Comments on DTLA 2040 Plan EIR and DTLA 2040 Plan

Dear Mr. Weber:

Thank you for the opportunity to comment on the DTLA Plan and DTLA 2040 Plan Draft EIR.

We are writing on behalf of our client, RCS VE LLC, concerning the plan's relationship to our client's proposed project at 670 Mesquit Street in the Arts District, the plan's proposal for the Arts District generally, and how the plan's Draft EIR addresses our client's proposed project. We have appreciated our coordination with the Planning Department on the proposed 670 Mesquit Street project, designed by world-renowned architectural firm BIG-Bjarke Ingels Group. The Department recommended consideration of the general plan amendment for the proposed project when the applications were filed in 2017. As we discussed in presenting an overview of the project to the 2040 Plan team last year, this forward thinking mixed-use project will contribute to the ongoing revitalization of the Arts District and improve public access to the adjacent Los Angeles River.

Like many recent projects in the Arts District, the lack of updated zoning reflecting the area's recent evolution necessitated a general plan amendment request four years ago. Accordingly, City staff's efforts to modernize the City's zoning regulations for the Downtown Community Plan are much appreciated, and we look forward to progress with the new Plan to recognize the ongoing and future transformation of the Arts District into a vibrant mixed-use community.

The mixed-use project contains approximately 1,800,000 square feet of floor area on an approximately 5.45-acre site. Uses include creative office space, a 236-room hotel, and 308

multi-family residential housing units. The Project would provide affordable housing consistent with Measure JJJ standards. Additionally, there would be general retail uses, restaurants, event and gallery space, and a gym. The project includes open space and has the potential to enliven the riverfront between 7th Street and the under construction 6th Street viaduct.

In addition to landscaped areas, pedestrian passageways and walkways, viewing platforms, above-grade landscaped terraces and pool decks, the project includes an innovative proposal to provide a publicly accessible multi-use deck along the Los Angeles River. This River access also harmonizes with the City's planned Park, Arts, River, and Connectivity (PARC) Improvements between the project site and the new 6th Street Ribbon of Light Bridge, with land for the PARC and Bridge operations made available through agreements with the landowners of the 670 Mesquit property.

A series of architectural renderings of the project are attached as Exhibit A.

Given the long pendency of the 670 Mesquit project, since the project EIR has been in process for some years with a Draft EIR expected in 2021, and the City's concurrent processing of the DTLA 2040 Draft Plan, we write to confirm the project's consistency with the goals of the draft plan. In addition, we propose several revisions to the draft plan that we believe are important to support further the Arts District's continuing success.

Specifically, we request the following modifications to the current draft plan.

- Restoration of the plan's zoning recommendation for the 670 Mesquit project site to the zoning proposed in the October 2019 draft of the DTLA 2040 Plan, which permitted a maximum bonus FAR of 6:1 across the entire project site and imposed no height limitation.
- Recognition of the planned new transit station to serve the Arts District at 6th Street, which is currently under review by Metro. Given the importance of transit to land use planning, we also request that the Transit Core land use designation be applied to the area within one-half mile from the planned Arts District / 6th Street Station, which includes the 670 Mesquit project.
- In order for the City to meet its housing goals, it is essential that housing be encouraged in downtown areas like the Arts District, where numerous residential projects have already been approved. Accordingly, we recommend elimination of the provisions of the proposed Industrial-Mixed 4 Use District that discourage housing and create economic barriers to affordable housing, including the draft's prohibition of construction of new general residential uses (i.e., what the plan defines as household living residential) in favor of permanent supportive housing and live-work units and its requirement that all new structures be built entirely as Type I, II or IV construction. Prohibiting wood frame construction is contrary to the affordable housing goals of the Plan.

- Incorporation of language allowing the Director of Planning to permit projects to develop floor area beyond base levels for large projects that make use of a specific plan and provide financial benefits and investments above and beyond those ultimately adopted in DTLA 2040.

1. The 2040 Draft EIR Should Consider the 670 Mesquit Project as Proposed.

Reviewing the plan's Draft EIR, we noted that it does not consider the 670 Mesquit project as part of the cumulative analysis or in an alternative. Given that this project's application was submitted prior to the commencement of the plan's Draft EIR and deemed complete shortly after the Draft EIR's Notice of Preparation was issued, the plan's Draft EIR should consider the project either as part of the plan itself, as part of the cumulative impact analysis, or as part of Alternative 3, which considers an increase in development potential over the proposed plan.

By way of background, the City deemed the project's application, which includes a Vesting Tentative Tract Map and City-initiated General Plan Amendment, complete on March 3, 2017, and under LAMC Section 17.15, the project is subject to the rules and regulations in place as of March 3, 2017. The City has been processing the project's EIR at the same time as the City has been processing the Plan EIR. In the future, when the City prepares the responses to comments and the Final EIR, together with its next version of the proposed plan, we respectfully request that the project be included in the plan EIR analysis. As the current version of the plan substantially departs from that studied in the Draft EIR, the City will have ample opportunity to incorporate changes into the updated environmental review.

2. The Project Is Consistent With Many Objectives of the DTLA 2040 Draft Plan.

The project is consistent with the November 2020 DTLA 2040 Draft Plan in numerous ways, and we hope that the next draft of the Plan will incorporate appropriate changes so that more complete consistency can be achieved, as further detailed below.

For example, the project features innovative architectural design along the Los Angeles River, between the iconic new multi-modal Ribbon of Light Bridge, the PARC Improvements, and the historic 7th Street Bridge. In this unique, prominent location, the project provides publicly accessible at-grade and generous above-grade open spaces that take advantage of the stepped building design, Los Angeles River frontage, nearby public improvements and opportunities for river access and panoramic views. In particular, the project creates direct pedestrian and bicycle connections that link the 7th Street Bridge with the project's proposed northern landscaped area, which would in turn connect to the City's proposed PARC Improvements and Ribbon of Light Bridge. Accordingly, the project supports DTLA 2040 Draft Plan policies to "make Downtown economically competitive through improvements to the public realm" (LU 5.3), "promote an enhanced public realm and network of pedestrian paths that connect neighboring resources, such as parks to the Los Angeles River" (LU 34.5), and "support the development of catalytic new parks and reinvestment in existing public spaces. Namely: ... 6th Street Parc" (PO 1.7).

Similarly, the Applicant proposes to redevelop underutilized, low jobs-producing storage uses with high-jobs-producing land uses that increase economic activity. In particular, the project is an office-forward development with associated high-quality employment opportunities that also provides a wide range of entertainment, restaurant, and recreational amenities. Accordingly, the project supports Hybrid Industrial General Plan Land Use Designation policies to “ensure a thoughtful mix of land uses including amenities to serve the evolving creative employee base and live/work community” (LU 31.2), “prioritize space for jobs and employment activity in Hybrid Industrial areas” (LU 32.1), and “encourage retail and restaurant uses in partnership with productive uses to promote extended hour of activity” (LU 34.3).

The project’s provision of much-needed market-rate and affordable multi-family housing also supports Hybrid Industrial General Plan Land Use Designation policies to “promote affordability through the development of a range of unit sizes” (LU 33.2) and “support affordable housing options for artists” (LU 34.6). The project’s mixed use development program also supports the DTLA 2040 Draft Plan policy to “foster healthy communities composed of mixed-income housing in proximity to transit, jobs, amenities, services, cultural resources, and recreational facilities” (LU 3.3).

The project’s overall design approach is intended to complement the industrial character of the Arts District with building materials such as concrete, steel, and glass, reflecting materials prevalent in the neighborhood, which supports the DTLA 2040 Draft Plan policies to “reinforce the distinct qualities of each neighborhood, and ensure that growth complements and is compatible with existing character and historic resources” (LU 10.2) while also featuring “innovative design that creates the preservation-worthy buildings of the future” (LU 15.4). Relatedly, the project’s incorporation of highly flexible modular space that can accommodate creative office, commercial, and residential uses, in an area rapidly transitioning from low-rise heavy industrial use to mixed use, also supports Hybrid Industrial General Plan Land Use Designation policies to “encourage the development of flexible spaces that can accommodate a variety of productive industries” (LU 31.1) and “foster the development of durable and flexible buildings that support a range of creative and productive activities, and offer live/work opportunities” (LU 34.2).

In addition, a multi-use deck over the railway property on the project’s eastside and along the Los Angeles River would create open space for the Arts District and Boyle Heights, complementing future public programming and enhancing public views of the Los Angeles River. The proposed deck supports DTLA 2040 Draft Plan policies to “identify physical interventions, such as decking over rail lines that can improve connectivity and access to the River” (PO 8.4) and “integrate direct visual access to the River in building design and site planning in the form of paseos, plazas, and open space facilities” (PO 8.5). As discussed below, this deck is an extraordinary public benefit that should be recognized with additional density as proposed by the project.

Street-level pedestrian-friendly frontages along Mesquit Street and the 7th Street Bridge will maximize building and site permeability and increase physical and visual access to the Los Angeles River and planned City improvements. The project also introduces four major

pedestrian passageways that visually connect Boyle Heights, the Los Angeles River, the Arts District, and greater Downtown and provide midblock access through the project. Extending of Mesquit Street to the south of Jessie Street creates a publicly accessible paseo. These elements support DTLA 2040 Draft Plan policies to “incentivize the inclusion of paseos through large sites to improve pedestrian access” (LU 11.3), “encourage building design that connects and orients people toward destinations and activity centers” (LU 11.4), “introduce shared street typologies for Arts District streets that preserve historic industrial characteristics while promoting access and safety for all users” (LU 34.7), and “adapt streets that are not critical to vehicular circulation to increase right-of way use for pedestrian circulation” (PO 2.2).

3. Proposed Zoning Modifications for this Property and for the Arts District Are Too Restrictive.

To support the project’s proposed floor area ratio, which exceeds that contemplated under the existing General Plan and zoning and the proposed DTLA 2040 Draft Plan, the project proposes a substantial public benefits package.

The project substantially exceeds the plan’s Community Benefits Program in multiple ways. The project provides on-site restricted affordable units, significant office space and job creation, substantial open space, and community facilities including a studio/event/gallery space and a potential museum. These components meet the draft 2040 DTLA’s standards for Local Affordable Housing Incentive Program, Employment Center Incentive for projects located with Community Benefits Standards Subarea A.2, Publicly Accessible Outdoor Amenity Space incentive program, and Community Facilities incentive program. Under the October 2019 draft plan, these benefits would have allowed a floor area ratio of six to one. This maximum bonus floor area ratio would have applied consistently across the entire Mesquit project site.

The project site should have consistent zoning as in the October 2019 recommendation. For the Mesquit project site specifically, the current proposal for the DTLA 2040 Draft Plan would establish a maximum bonus FAR of 6:1 for a portion of the site, 4.5:1 for another portion, and 3:1 for another portion. However, to provide the substantial benefits on a site of the project’s size, more floor area is needed than can be developed under a 3:1, 4.5:1, or 6:1 floor area ratio.

The project’s ownership and developers are particularly concerned that the most recent iteration of the draft plan has downzoned the project site (see attached graphics at Exhibit B) and imposed restrictive height limits that appear to single out this site for lower heights than comparable projects. We respectfully submit that this was not warranted for multiple reasons.

First, the 6th Street Viaduct Replacement project, expected to be completed in early 2022, includes the PARC Improvements, an approximately 12 acre area with open space and recreational amenities. The City and RCS VE LLC entered into an easement agreement and option for the City’s use of portions of the northern end of the 670 Mesquit Street project site. The 670 Mesquit Street project includes a proposed publicly accessible Northern Landscaped Area that would connect with the City’s proposed PARC Improvements adjacent to and beneath

the Ribbon of Light Bridge. The project also includes a landscaped balcony that would connect the Northern Landscaped Area and proposed PARC improvement to the north with an elevated pedestrian walkway or deck that would extend across the eastern edge of the project site to the 7th Street Bridge. By incorporating landscaped open space into the project's northern end and providing direct pedestrian connections linking the 7th Street Bridge with the Northern Landscaped Area and PARC Improvements, the project would expand the potential for shared use of the PARC Improvements and unite the Arts District neighborhoods and Boyle Heights communities.

Second, Metro has proposed a substantial investment in a rail project to serve the Arts District and the project site. Specifically, Metro is currently studying a proposed new heavy rail station near 6th Street that would serve the Arts District and surrounding neighborhoods. In June 2018, the Metro Board of Directors approved a funding agreement with the City of Los Angeles to financially support pre-design, public outreach, and the Arts District / 6th Street Station EIR, which Metro anticipates completing in late 2021. Accordingly, we request that the DTLA 2040 Draft Plan include a conditional Transit Core land use designation applicable to the area surrounding the Arts District / 6th Street Station, if approved.

We request that the project site's zoning be restored to the proposed zoning in the October 2019 draft of the DTLA 2040 Draft Plan, which permitted a maximum bonus FAR of 6:1 across the entire project site and no height limitation. The draft plan provides no reason for this substantial downzoning of the project site, and we see none. The properties on the west side of Mesquit Street are designated [MB3-CDF1-5] [IX4-FA] [-CPIO- -].

By comparison, the draft plan spot zones the eastern side of Mesquit Street between 6th St and 7th St at a substantially lower density. Not only is this in conflict with the prior draft plan versions and the vested project, it does not reflect the substantial planned infrastructure upgrades in the project site's immediate vicinity. There should be consistent zoning for railroad adjacent properties in this area. However, if the Mid-Rise Medium 1 and Mid-Rise Broad 2 form districts are retained, the respective 18 and 5 story height limitations should be removed.

In addition, the Industrial-Mixed 4 Use District should be revised to permit new construction of household living residential uses. It is not clear why housing in the Arts District has been proposed to be so limited when the City needs all kinds of housing in all areas to build out of the current housing shortage. It is not appropriate to limit development of new housing in the Arts District to permanent supportive housing or live/work units, and we respectfully request that the plan be revised to remove this limitation on new housing in the Arts District. We also request that the Industrial-Mixed 4 Use District requirement that all new structures be built entirely as Type I, II or IV construction be removed.

4. **The DTLA 2040 Draft Plan Should Incorporate Flexibility for Large Mixed-Use Projects with Specific Plans.**

We propose that the plan should expressly provide for the inherent benefits provided by projects covering more than three acres.

This ambitious project offers a public benefits package that far exceeds the public benefit requirements set forth in the DTLA 2040 Draft Plan. While the project was proposed prior to DTLA 2040, because such projects have a unique opportunity to benefit the Arts District through their physical changes and introduction of a wide range of uses, DTLA 2040 should expressly acknowledge that through a Specific Plan, projects can develop floor area beyond base levels and provide financial benefits and investments above and beyond those ultimately adopted in DTLA 2040.

To give the City flexibility with respect to large and unique development opportunities, we recommend that the City adopt language allowing the Planning Director to approve floor area ratio above the plan's base standards in certain circumstances. Specifically, we propose a footnote be added to the DTLA 2040 Draft Plan that allows for the Planning Director to approve a floor area ratio and height above the plan's base standards when a specific plan has been initiated for a project that exceeds three acres in area and upon a finding that the project exceeds the job creation and public benefits provisions of the plan's Community Benefits Program.

This flexibility will allow the City to facilitate large and transformative projects on large sites that offer extraordinary public benefits, helping to achieve a sustainable, equitable, and inclusive future for Downtown. The increased flexibility is also needed to aid Downtown's recovery from the deep impacts of the COVID-19 pandemic and the ongoing housing and homelessness crisis.

The project at 670 Mesquit is one of such projects and we look forward to working with the City in its consideration of a project that furthers the City's vision for the Arts District, the Downtown community, and the whole City of Los Angeles.

Finally, recognizing that the City has been conducting environmental review for this project for several years and the project is already well along in the environmental review process, after the City initiated a General Plan amendment for the project and deemed its applications complete, the DTLA 2040 Plan's EIR should reflect the project as part of its overall environmental review.

Thank you for your time and your consideration of these issues. We would be happy to discuss them with you further.

Very truly yours,



Benjamin J. Hanelin
of LATHAM & WATKINS LLP

LATHAM & WATKINS LLP

cc: Mr. Michael LoGrande
Mr. Frank Gallo
Mr. Zach Vella
Cindy Starrett, Esq.
Derek Galey, Esq.

Exhibit A – Project Renderings

















Exhibit B – Project Site Downzoning





December 11, 2020

Ms. Brittany Arceneaux
Department of City Planning
City of Los Angeles
200 North Spring Street, Room 667
Los Angeles, CA 90012

Dear Ms. Arceneaux,

Thank you for the opportunity to comment on the forthcoming update to the Downtown Community Plan. We are writing on behalf of **Abundant Housing LA**, a pro-housing education and advocacy organization working to help solve Southern California's housing crisis. We support efforts to reform land use regulations and zoning codes, and expand housing production at all levels of income.

As you know, the City of Los Angeles is suffering from a severe housing crisis. Exclusionary zoning and longstanding constraints on denser housing production, combined with a lack of sufficient funding for affordable housing production and preservation, have led to a massive shortage of medium and high density housing, especially near jobs and transit. Since 2013, Los Angeles' housing supply has [grown by just 4%](#).

This has made Los Angeles one of the nation's most unaffordable housing markets; [according to the Los Angeles Times](#), the average rent rose 65% since 2010, to over \$2,500. High rents and a lack of new housing opportunities have caused greater financial pressure on families, longer commutes, increasing carbon emissions, more displacement of historically disadvantaged communities, high homelessness, and reduced access to economic and educational opportunity. This has also reinforced longstanding patterns of income and racial segregation in our city's neighborhoods.

Fixing these problems requires us to encourage the construction of hundreds of thousands of new homes, both market-rate and deed-restricted affordable, throughout our city. Fortunately, the Regional Housing Needs Assessment (RHNA) affords Los Angeles the opportunity to finally address its housing crisis in a transformational way. In the upcoming Housing Element Planning Cycle, Los Angeles must accommodate **456,000 new homes** by the end of the decade, **40%** of which must be affordable to households with very low or low incomes.

To achieve this goal, the City will need to update its housing element and community plans in order to accommodate this historic amount of housing production. In particular, denser housing production is needed in neighborhoods with excellent access to transit and jobs, like Downtown Los Angeles. This will reduce rents, improve access to jobs and transit, strengthen the local

economy, protect the environment and reduce car dependency, reduce displacement, and promote racial and socioeconomic equity.

Additionally, it is imperative that City policy promote development without displacement. [Gentrification and displacement of lower-income communities are a painful consequence of systemic racism and of our region's exclusionary zoning and subsequent lack of new housing.](#) When high-income neighborhoods refuse to allow housing, renters in all neighborhoods are harmed, and lower-income renters are harmed the most. Displacement is felt acutely in Communities of Color, given that they frequently face [heavier housing cost burdens](#) than white Angelenos, and typically comprise the majority of the population in gentrifying neighborhoods.

This is the case in Chinatown, where the [availability of affordable homes has declined](#) in recent years due to the expiration of affordability covenants, creating undue financial pressure on Chinatown's renter community. We recognize the valuable work of Chinatown community leaders and tenants' rights advocates in drawing attention to this important issue and advocating for solutions that promote the preservation of affordable housing.

[Abundant Housing LA's policy agenda](#) endorses stronger tenant protection policies, such as expanded affordable unit replacement requirements ("no net loss") for redevelopment of existing rental properties, a "right of return" after redevelopment at the same rent as before, rental assistance during redevelopment, and a voluntary, negotiated tenant buyout system. Applying these policies citywide would help ensure that lower-income renter households can remain in their communities at an affordable rent, as new housing opportunities are created.

With all this in mind, we applaud Planning's efforts in updating the Downtown Community Plan. The proposed update would encourage significant housing growth in our city's most job- and transit-rich neighborhood by allowing residential uses in 60% of Downtown's land (up from only 33% today) and broadly increasing maximum FAR and building heights. These policies would create space for an estimated 100,000 new homes and 86,000 new jobs by 2040.

Furthermore, the proposed community benefits program would directly incentivize construction of on-site affordable homes through a density bonus program. Additionally, by allowing by-right approval of projects with up to 500 housing units (for projects that use the community benefits program), the City will streamline the production of much-needed housing and reduce opportunities for nuisance lawsuits and political interference. Finally, the elimination of mandatory on-site parking requirements for new construction is [a necessary, farsighted step](#) towards reducing our city's car dependence and carbon footprint.

Abundant Housing LA has identified opportunities for additional improvements to the Downtown Community Plan. We believe that more can be done to encourage additional housing growth, both market-rate and deed-restricted affordable, further reduce car dependence, and generate funds for affordable housing and improvements to transit and pedestrian infrastructure.

Recommendation #1: Restore the proposed base FAR from the summer 2020 version of the Plan, eliminate proposed maximum building heights, and implement the maximum bonus FAR proposed in the Draft Environmental Impact Report's Alternative 3.

We support the Plan's efforts to encourage denser housing production by increasing the maximum base FAR, and by instituting a density bonus program that offers a higher maximum bonus FAR in return for meeting an affordable housing set-aside requirement. However, we are concerned that the most recent version of the Plan [reduces the maximum base FAR in northeast and southeast Downtown, and reduces the maximum bonus FAR in southeast Downtown](#) from 4.5:1 to 3:1.

While we recognize that this change is intended to encourage usage of the density bonus program, we would point out that the change greatly reduces the attractiveness of the Level 1 density bonus tier (a 35% density bonus on a 6:1 base FAR provides an extra 2.1 FAR, but only provides an extra 0.7 FAR when the base FAR is 2:1). This change would make usage of the density bonus program less economically feasible, resulting in less production of deed-restricted affordable homes in neighborhoods like Chinatown and the Arts District, where affordable housing growth is desperately needed. We urge you to restore the original maximum base and bonus FAR proposed in the summer 2020 version of the Plan.

We are also surprised that the Plan proposes new maximum building heights in some portions of Chinatown, Little Tokyo, the Historic Core, the Fashion District, and the Arts District. These limitations are likely to make it physically impossible or economically infeasible to build to the maximum base and bonus FARs proposed in the Plan, which would again discourage housing production and usage of the community benefits program in these areas, many of which are within walking distance of Metro stations. We recommend eliminating these maximum building heights; the Plan should instead regulate maximum building sizes through the FAR limits.

Finally, we support increasing the maximum bonus FAR in the community benefits program. We recommend adopting the Draft Environmental Impact Report's Alternative 3, which would raise the maximum bonus FAR to 10:1 in areas where the maximum bonus FAR is currently proposed as 3:1, 4.5:1, 6:1, and 8.5:1, and would raise the maximum bonus FAR to 13:1 in areas where the maximum bonus FAR is currently proposed as 8:1 and 10:1. Larger maximum FARs would make the density bonus program even more attractive by improving the economic feasibility of new housing projects. Also, since the affordable unit set-aside is now calculated as a percentage of the **total** building units (rather than the base units), this would directly increase the number of affordable units in projects that use the community benefits program.

Recommendation #2: Modify the requirement that residential buildings in Subarea A.3 that use the density bonus program must make at least 30% of the building's units two bedrooms or larger. Encourage production of affordable family units by introducing a "super-density bonus" tier throughout Downtown, for projects that make at least 30% of the building's two bedrooms or larger.

Under the current Plan, a residential project in Subarea A.3 (which roughly equates to the Chinatown neighborhood) would only be able to use the density bonus program if at least 30% of the building's units are two bedrooms or larger. The intent of this policy is very positive: it is designed to encourage the production of family housing, which responds to the severe need for housing opportunities that are affordable to families in Chinatown, especially households with lower incomes. City policy **should** encourage new affordable family housing in Chinatown.

However, we are concerned that designing this policy as a one-size-fits-all mandate is likely to backfire and discourage affordable housing production in Subarea A.3 altogether. It would impose a substantial new cost on housing production, causing fewer residential projects to be economically feasible. This is especially true for buildings that would primarily offer micro-units or studios, which have lower rental costs relative to larger units. Builders would likely respond to this requirement by declining to use the density bonus program at all, which would deter the production of both deed-restricted affordable and market-rate housing units in Subarea A.3.

We strongly support more housing in Downtown, and we want more of the new homes built in Downtown to be affordable to families with low incomes. To achieve this outcome, we propose introducing an optional "super-density" bonus FAR tier for projects that make at least 30% of the building's units two bedrooms or larger. This FAR bonus could be designed as a "Level 3" above and beyond the current maximum bonus FAR in the proposed community benefit program. Since the affordable unit set-aside is now calculated as a percentage of the **total** building units (rather than the base units) this policy would directly increase the number of affordable units in a project that chooses to use the "super-density" bonus tier. We also recommend applying this "super-density bonus" tier throughout Downtown, not just in Subarea A.3.

Recommendation #3: Introduce a parking maximum on new construction, and introduce a per-space fee on all existing and new parking lots and garages in Downtown.

Again, we strongly support the Plan's proposed elimination of mandatory on-site parking requirements throughout Downtown, and we applaud your team for taking a bold step towards transforming Downtown into a transit- and pedestrian-first neighborhood. Eliminating this restriction will create more space for housing units within future residential projects, and reduce the cost of housing construction (resulting in lower rents and home purchase prices).

Nevertheless, bolder actions are needed in order to achieve this transformation more quickly. Like most of Los Angeles, Downtown has a massive oversupply of parking spaces; [researchers estimate that it has over 400,000 parking spaces](#). If every Downtown resident and worker parked at once, there would still be more than 100,000 open spaces. These spaces can accommodate future Downtown population and job growth, especially as greater adoption of mass transit and autonomous vehicles/mobility-as-a-service make car ownership less common. Furthermore, even in the absence of an on-site parking requirement, risk-averse bank lenders

and investors are still likely to insist that new projects maintain a high level of on-site parking, limiting the impact of the City's elimination of the on-site parking minimum requirement.

For these reasons, we recommend introducing a parking **maximum** on new construction throughout Downtown. In the case of residential development, this policy should cap on-site parking to a maximum of one parking space per new housing unit. The City should also introduce a per-space fee on all existing and new parking lots and garages in Downtown, which would create a revenue stream to fund affordable housing, streetscape improvements, better pedestrian safety infrastructure, higher-quality mass transit, and a program to facilitate better parking management (which will increase the accessibility of existing surplus parking spaces). This policy would also encourage the redevelopment of existing lots and parking structures into new homes and businesses, further establishing Downtown as a hub of economic activity and vibrancy.

Parking maximums have been successfully implemented throughout [London](#) and [Mexico City](#), and in parts of [San Francisco](#) and [Oakland](#). Mexico City's policy requires developers to pay a fee if they build more than 50% of the maximum parking allowed. Revenues from the parking fee are used to improve transit and subsidize housing.

Los Angeles needs to prioritize homes for people over homes for cars, particularly in neighborhoods like Downtown that are well-served by a growing network of rail, bus, and protected bike lanes. A Downtown parking maximum would help to achieve this policy objective, and accelerate our city's evolution away from car dependence.

Recommendation #4. Amend the Industrial-Mixed Use 2 (IX2) and Hybrid Industrial 2 (HI2) zones to allow all residential housing types. Do not restrict housing options in these areas to live-work units only.

Under the proposed Plan, the Industrial-Mixed Use 2 (IX2) and Hybrid Industrial 2 (HI2) zones would limit new residential units in the Fashion District and Arts District to live-work units only. We are concerned that this requirement would effectively mandate the production of high-cost housing units as the sole option for new housing in these neighborhoods.

This is because live-work units are generally built to specifications above and beyond standard rental housing, including features like high ceilings and a large minimum unit size (at least 750 square feet in the Fashion District; at least 1,000 square feet in the Arts District). Since homes with these specifications are more expensive to build than most housing units, this requirement would essentially make it infeasible to build affordable housing, middle-income housing, or studio and one-bedroom units in the IX2 and HI2 zones, and would discourage use of the density bonus program in these areas.

While we recognize that the Plan was recently amended to loosen these restrictions somewhat, residential projects would still need to include a minimum 1 FAR of commercial or light industrial

space, unless the residential units are live-work. This requirement could still render potential residential projects economically infeasible, especially given the uncertain pace at which demand for commercial space will recover post-pandemic. There's no clear rationale for the City to mandate the inclusion of commercial or live-work space within residential projects in the Fashion District and Arts District, and we recommend eliminating this requirement altogether.

A Downtown Community Plan update that incorporates the above recommendations will help advance our common goals of housing affordability, socioeconomic equity, economic prosperity, and environmental sustainability. We look forward to further engagement with the Department of City Planning on this critical effort, and are happy to meet with you at any time to discuss these policy proposals.

Thank you for your consideration, and for your hard work on this important project.

Sincerely,

Leonora Camner
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Abundant Housing LA

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December 4, 2020

VIA EMAIL

Mr. Craig Weber
Principal City Planner & Division Head
Community Planning

Ms. Brittany Arceneaux
City Planner

Department of City Planning
200 N Spring Street
Los Angeles, CA 90012

Re: 1201 N. Broadway: Comments on Draft DTLA 2040 Plan and DTLA 2040 Plan DEIR (ENV-2017-433-EIR)

Dear Mr. Weber and Ms. Arceneaux:

This letter is submitted on behalf of the ownership of 1201 N. Broadway, which also includes adjacent properties fronting East Savoy Street, collectively referred to herein as the “Property.” We have appreciated the opportunity to talk with you and your team about the DTLA 2040 Draft Community Plan (“Draft Plan”). Please note that given the dramatic economic effects of the COVID-19 pandemic, we believe the City’s initial approach to the Draft Plan, reflected for example by its June 2019 recommendations that increased density and height in many locations, is essential to maintain. The Draft Plan was conceived in robust economic times, but recovery from pandemic economic conditions, and continued investment in urban areas, will require recognition of the many challenges the pandemic has imposed. We look forward to working with the DTLA 2040 team and the City as the public process continues.

For the Property, we believe the recommended density for the portions of the Property fronting Broadway under the Draft Plan issued in June 2019 with a “maximum FAR of 6:1 to 8.5:1” was appropriate both to the local conditions of the Property and in recognition of the Draft Plan’s goals. The Property is within convenient walking distance from the Metro L (Gold) Line Station at College Street, and a major focus of both the Draft Plan and the Draft Plan’s draft environmental impact report (“DEIR”) is to encourage additional housing near transit.

With respect, we do not believe that the Draft Plan’s most recent revision issued in November 2020 - which is more restrictive and provides for less density than current zoning and

the prior zoning recommendations in every earlier iteration of the Draft Plan - supports the goals of encouraging housing near transit. Recognizing that under regional planning documents, the City has a housing production goal of over 455,000 for the next eight years, downzoning Downtown-adjacent properties located near transit connections such as the Property will not enable the City to achieve this goal. For the reasons summarized below, we request that the City apply the Community Center designation and [DM5-SH2-5][CX1-FA][CPIO] zoning to the Property.

The EIR Should Analyze a Density of 6:1 to 8.5:1 FAR for the Property

The Draft Plan repeatedly emphasizes the importance of providing housing near transit in order to meet the City’s housing needs and climate goals. The Property is designated Tier 3 under the City’s Transit Oriented Communities Guidelines due to the proximity to Metro’s L (Gold) Line Station in Chinatown. Recognizing that the DEIR analyzed higher FAR and height for the Property from the August 2020 Draft Plan and determined such designations would not result in any significant impacts, we request that the City analyze a density for the Property consistent with the density proposed for the property across Broadway, as such a density is more likely to accomplish the overall Plan goals of increasing housing densities near transit.

The following chart illustrates the current, August 2020 Draft Plan zoning, and the proposed zoning under the November 2020 Draft Plan for the portions of the Property that front on Broadway (“Broadway Properties”). The June 2019 Draft Plan stated that Villages designated properties, such as the Broadway Properties, have a “maximum FAR of 6:1 to 8.5:1.” This proposed FAR can be applied to the Broadway Properties when the Draft Plan is updated, contributing to the City’s ability to meet housing goals.

Broadway Properties Zoning

	Current Zoning	August 2020 Draft Plan	November 2020 Draft Plan
<i>Designation</i>	Regional Commercial	Villages	Villages
<i>Zoning Designation</i>	C2-2D	[LLM2-SH2-5][XN1-FA][CPIO]	[LM2-SH2-5][CX1-FA][CPIO]
<i>Base FAR</i>	3:1	3:1	1.5:1
<i>Bonus FAR (Draft Plan)</i>	N/A	None	3:1
<i>Bonus FAR (TOC Incentives)</i>	4.5:1	4.5:1	Supersedes TOC Incentives
<i>Base Height</i>	Unlimited	4 stories	3 stories
<i>Bonus Height</i>	N/A	8 stories	6 stories

Accordingly, the current zoning is more permissive than the November 2020 Draft Plan, which limits FAR to 1.5:1 without utilizing any bonus scheme. Likewise, current zoning is more

permissive than both the August 2020 Draft Plan and the November 2020 Draft Plan, which limit the height to 4 stories (maximum of 8 with bonus) and 3 stories (maximum of 6 with bonus), respectively.

Current entitlements on the Broadway Properties allow for 6 stories and a FAR of 2.99:1; in 2017, the City approved a VTTM and Site Plan Review that would permit 118 residential units and 8,800 square feet of commercial floor area on the Property. (See VTT-74785 and DIR 2016-4075-SPR.) The VTTM and associated entitlements were extended this past summer and remain in effect for some years to come, subject to additional tolling provided for under the Mayor’s emergency COVID orders.

The June 2019 Draft Plan designated the portion of the Property fronting Savoy (“Savoy Properties”) as Medium Neighborhood Residential, which included a “maximum FAR of 3:1.” This FAR was maintained in the August 2020 Draft Plan. The November 2020 Draft Plan update downzones and restricts development on the Savoy Properties. The following chart illustrates the current, August 2020 Draft Plan zoning, and the current proposed zoning under the November 2020 Draft Plan for the Savoy Properties. As with the Broadway Properties, the current zoning on the Savoy Properties is more permissive than the November 2020 Draft Plan, which limits FAR to 1.5:1 without the use of bonus density.

Savoy Properties Zoning

	Current Zoning	August 2020 Draft Plan	November 2020 Draft Plan
<i>Designation</i>	Medium Density Residential	Medium Neighborhood Residential	Medium Neighborhood Residential
<i>Zoning Designation</i>	R3-1	[LLN1-MU1-5][RN1-FA][CPIO]	[LN1-MU1-5][RX1-FA][CPIO]
<i>Base FAR</i>	3:1	3:1	1.5:1
<i>Bonus FAR</i>	N/A	None	3:1
<i>Bonus FAR (TOC Incentives)</i>	4.5:1	4.5:1	Supersedes TOC Incentives
<i>Base Height</i>	45 feet	4 stories	3 stories
<i>Bonus Height</i>	67 feet (TOC Incentives)	8 stories	6 stories

The recommended, additional restrictions in the November 2020 Draft Plan risk the unintended consequence of stifling development in transit-rich areas where the City should be promoting growth, such as at the Property. The reductions in base FAR are too low to build a viable project, and place a large financial burden on projects to obtain the FAR that the current zoning code and prior iterations of the Draft Plan allowed by-right.

Further, the proposed building height limits do not support the City's aims to grow in areas near transit. Imposing a 3 to 6 story height limitation is inconsistent with current zoning, which does not provide height limitations on the Broadway Properties. Rather than impose strict height limitations, the Plan should consider context-sensitive growth and density near transit. Recognizing that greater FAR and height are warranted due to the Property's proximity to transit, the Property should be afforded the density allocations of 6.1 to 8.5:1 FAR initially considered for Villages designations in the June 2019 Draft Plan. To further support the financial feasibility of transit-oriented development, FAR, setbacks, and frontage requirements should be utilized in lieu of building height restrictions in the Draft Plan.

Providing the Community Center Designation and Corresponding [DM5-SH2-5][CX1-FA][CPIO] Zoning for the Property is Consistent with the Draft Plan's Goals and the DEIR's Emphasis on Locating Housing Near Transit

The Draft Plan proposes significantly more density and height at the property located directly across Broadway from the Property and to the northeast. This property is proposed to be designated Community Center with [PLM1-SH2-5][XN1-FA][CPIO] zoning under the August 2020 Draft Plan and [DM5-SH2-5][CX1-FA][CPIO] zoning under the November 2020 Draft Plan, allowing for a FAR of 6:1 with a bonus FAR of 8.5:1, and a base height of 12 stories, with a bonus height of 15 stories.

The same designation, height, and FAR are appropriate for the Property and compatible with development in Chinatown, including this area's transition as more multifamily housing is provided for a transit oriented community. As noted above, the Property is designated Tier 3 under the City's Transit Oriented Communities Guidelines due to the proximity to Metro's Gold Line Station in Chinatown. The Draft Plan's goals and policies, as well as the DEIR, support the Draft Plan designating the Property as Community Center with [DM5-SH2-5][CX1-FA][CPIO] zoning in order to facilitate growth near transit resources.

The Draft Plan's Guiding Principles and DEIR's Project Objectives Recognize the Importance of Prioritizing Growth Near Transit

The Draft Plan's overall vision is to "accommodate anticipated growth," addressing the need for housing "in close proximity to transportation resources." (Draft Plan, Chapter 1, p. 4.) Further, as the DEIR notes, "[o]ver the next few decades, population in the Downtown Plan Area is anticipated to increase by approximately 150 percent by year 2040, as identified by current SCAG projections in 2016." (DEIR, p. 3-22; see also Draft Plan, Chapter 1, p. 12 [identifying SCAG population growth trends and projections].) Recent SCAG projections have only increased the City's housing production goal, and the "Downtown Plan Area is projected to continue growing at a faster rate than the City of Los Angeles as a whole." (DEIR, p. 3-22.) The DEIR repeatedly emphasizes the need for additional housing in the Draft Plan area. (*Id.*, pp. 4.12-16, 4.12-20, 4.14-8.) Accordingly, the Draft Plan should not be decreasing height and FAR, but instead should seek to promote growth in close proximity to transit, consistent with the DEIR's objectives to focus "residential development around transit stations" and allow for "intensive development throughout the Downtown Plan Area, and concentrating development

opportunity immediately surrounding the transit stations with an appropriate range of building sizes and mix of uses.” (*Id.*, p. 3-24.)

The DEIR characterizes the Draft Plan as articulating “a strategy for land use planning that will accommodate projected growth by encouraging higher intensity development and the most extensive mix of uses in areas that are served by high-frequency transit service.” (DEIR, p. 3-25.) Further, the DEIR notes that the Draft Plan’s strategy would “allow for infill development of additional housing units and job-producing uses in areas with existing transportation infrastructure such as Metro Rail Line stops.” (*Id.*, p. 3-27; see also Draft Plan, Chapter 1, p. 10 [goals to “promot[e] infill development” and “concentrate[e] growth near transit”].) The Property is located near the Metro Gold Line Chinatown Station, and accordingly the Draft Plan should accommodate additional growth on the Property through the Community Center designation and corresponding zoning.

In addition, the DEIR states that the Draft Plan will result in “higher densities than existing conditions” because:

Primary objectives of the Downtown Plan include: 1) maximizing development opportunities around existing transit systems to encourage sustainable land use, and 2) directing growth towards transit hubs and corridors.

(DEIR, p. 4.11-19.) As noted above, a change in zoning recommendations is necessary before these statements can apply for the Property. Rather than allowing for a higher density that would help achieve the Draft Plan’s primary objectives, the November 2020 Draft Plan would downzone the Property from current and previously proposed zoning. Designating the Property as Community Center with [DM5-SH2-5][CX1-FA][CPIO] zoning advances the Draft Plan’s objectives to “maximize[e] development opportunities around existing transit systems” and to direct[] growth towards transit hubs and corridors,” because it allows for greater development opportunities on a site close to an existing Metro rail station.

The Draft Plan and DEIR Seek to Promote Sustainable Growth and Development

The DEIR and Draft Plan also seek to increase transit usage and promote sustainable growth to reduce greenhouse gas emissions. The “Plan calls for efficient use of land that supports walking, bicycling, and access to transit, reducing energy consumption, and fostering environments for active and passive recreation.” (Draft Plan, Chapter 2, p. 27.) Policy LU 17.9 calls for the Plan to “support local, regional, state, and federal programs seeking to reduce greenhouse gas emissions, in an effort to minimize pollution sources and to improve air quality.” In addition, DEIR objectives seek to “[p]romote a mode-shift from private automobile usage and foster a transit, bicycle, and pedestrian supportive environment,” and “[r]educe vehicle miles traveled to meet the goals of the Senate Bill 375, Senate Bill 743, and California Assembly Bill 32 to reduce carbon emissions.” (DEIR, p. 3-24.) More permissive zoning at the Property would facilitate these goals, because it would enable additional housing near transit, thus reducing vehicle miles traveled as residents would be encouraged utilize the nearby Metro system rather than private automobiles.

The DEIR's analysis of the Draft Plan's environmental impacts takes into account the Draft Plan "incentiviz[ing] new development opportunities around existing transit systems; direct growth to transit hubs and corridors," and that the revised zoning code "would provide for a variety of options for accommodating planned development along . . . transit notes." (DEIR, p. 4.2-20.) Likewise, the DEIR notes that the Draft Plan "promotes concentrated, mixed-use development adjacent to transit stations and corridors in order to conserve resources and create more sustainable development pattern by increasing opportunities for active transportation and reducing the use of cars" and would "incorporate transit-oriented development." (*Id.*, pp. 4.7-33, 4.7-34; see also p. 4.10-42 ["The Downtown Plan would reduce work trips by promoting development near major transit hubs. . ."]; p. 4.10-47 ["The Downtown Plan would concentrate future growth in areas well-served by transit."].) Allowing for additional FAR and height at the Property with the Community Center designation and [DM5-SH2-5][CX1-FA][CPIO] zoning is consistent with these aims as it would enable additional housing near existing transit.

In sum, designating the Property as Community Center with [DM5-SH2-5][CX1-FA][CPIO] zoning facilitates the type of "high density, mixed-use infill development in an area well served by transit" that the Draft Plan is intended to facilitate. (DEIR, p. 6-2.) The November 2020 Draft Plan's proposed zoning has the opposite effect and should not be carried forward into the next iteration of the plan, and the higher density and height potential for the Property should be reflected in the final environmental impact report.

Additional Revisions to the Draft Plan Are Needed to Support Transit-Oriented Development

In addition to the proposed revisions to the Property's land use designation and zoning, the Draft Plan should ensure that it is not imposing any unnecessary roadblocks to development near transit. For instance, in prior Draft Plan iterations, occupiable space located on the ground story was not included in the calculation of the floor area within Development Standards District 5. Occupiable space included lobbies, meeting rooms, gyms, and occupiable ground floor tenant space. The November 2020 Draft Plan no longer includes excludes occupiable space on the ground story. Counting this space within FAR calculations while substantially decreasing FAR within the November 2020 Draft Plan severely limits the ability to develop the number of residential units needed to meet the City's housing production goal while providing a "livable and healthy community" for residents. (See e.g., Draft Plan, Chapter 1, p. 4.)

Further, for projects under the Draft Plan's Community Plan Implementation Overlay ("CPIO"), the Draft Plan requires the issuance of a building permit for replacement development prior to the issuance of a demolition permit. (Draft Plan, CPIO, p. 9.) Such a requirement places an unnecessary burden on the ability to quickly and efficiently proceed with development in furtherance of the Plan's goals.

We are also concerned that the November 2020 Draft Plan proposes to supersede the City's Transit Oriented Communities Guidelines and Incentives with more stringent requirements. The City's proposed replacement program provides a bonus FAR that is at the lowest end of the City's affordable housing incentive programs. The Property is currently designated as Tier 3 under TOC, which would allow for a density increase of 70 percent and a

FAR increase of 50 percent. The Draft Plan's replacement program would only allow for a FAR increase of 35 percent, and no density increase. TOC has been effective at producing mixed-income developments with on-site rent-restricted affordable housing. The Draft Plan should not abandon this program, or at the very least should increase the incentives offered to encourage the type of transit-oriented, infill development the DEIR and Draft Plan repeatedly state is necessary to accommodate additional growth in a sustainable manner. As noted above, given the impacts of the COVID-19 pandemic, economic constraints should be considered in designing incentives for public benefits like affordable housing.

In the next draft of the Plan, we would also appreciate clarification that lot area per unit is not limited by a prescribed square footage in the FA Density District. (Draft Plan, p. 6-9.) The Draft Plan's Public Benefits Systems article also states that for the purpose of calculating the base number of units allowed under the Affordable Housing Incentive programs or Public Benefits programs in the FA Density District, "the maximum allowable units is determined by dividing the allowed floor area (in square feet) by the Base FAR, and then by a standardized unit size of 950 square feet." (*Id.*, p. 9-5.) We understand this standardized unit size to only apply for the purposes of calculating the base number of units under the State Density Bonus provisions or local incentives to encourage affordable housing, but does not otherwise prescribe a standardized unit size.

Conclusion

Thanks again for your consideration, and we look forward to continued discussions as the Draft Plan and environmental processes move forward. Please do not hesitate to contact me should you have any questions.

Very truly yours,



Beth Gordie
of LATHAM & WATKINS LLP

cc: Shana Bonstin, Deputy Director of Planning
Lisa Webber, Deputy Director of Planning
Valerie Watson, Senior City Planner
Cindy Starrett, Latham & Watkins
Samantha Seikkula, Latham & Watkins

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December 4, 2020

VIA EMAIL

Mr. Craig Weber
Principal City Planner & Division Head
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Ms. Brittany Arceneaux
City Planner

Department of City Planning
200 N. Spring Street
Los Angeles, CA 90012

Re: Los Angeles Aerial Rapid Transit Gondola Connecting Union Station and Dodger Stadium: Consistency with DTLA 2040 Community Plan Update and Comments on DTLA 2040 Plan DEIR (ENV-2017-433-EIR)

Dear Mr. Weber and Ms. Arceneaux:

We write to you on behalf of our client, Aerial Rapid Transit Technologies LLC (“ARTT”), who in 2018, through the Office of Extraordinary Innovation of the Los Angeles County Metropolitan Transit Authority (“Metro”), proposed an aerial rapid transit gondola system connecting Union Station and Dodger Stadium (the “Project” or “LA ART”). In May 2019, ARTT and Metro entered into a Memorandum of Agreement in which Metro agreed to act as lead agency under the California Environmental Quality Act for the environmental review process for the Project. LA ART began the public environmental review process in October 2020 with Metro’s issuance of a Notice of Preparation (“NOP”), which is attached for your information. Recognizing that the City is in the process of updating the Downtown region’s Community Plans through the DTLA 2040 Draft Community Plan (“Draft Plan”), we request that LA ART, which is primarily located in the Draft Plan area, be appropriately acknowledged within the DTLA 2040 Community Plan and the Draft Plan’s final environmental impact report (“FEIR”).

The importance of integrating transportation planning into the Draft Plan has been acknowledged by both Metro and the City, in that Metro has contributed funding to the City for preparation of the Draft Plan. As the Draft Plan recognizes, “the primary purpose of a

Community Plan document is to provide a long term vision for land use, growth and development in each community of Los Angeles,” addressing “transportation options, as well as environmental and economic sustainability.” (Draft Plan, Chapter 2, p. 18.) In light of this long term visionary planning, consideration of LA ART as a new and innovative means of transit within the Draft Plan to provide greater transportation options in Downtown is fully appropriate.

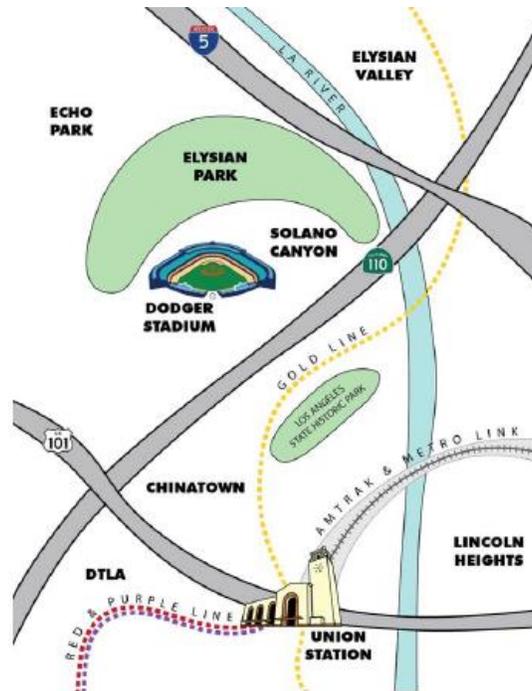
LA ART is proposed to directly link Dodger Stadium to the Los Angeles region’s public transit hub at Union Station – housing Metrolink, Metro’s Red, Gold, and Purple lines, the upcoming Regional Connector and supporting bus, and bicycle and pedestrian connections – increasing mobility options and benefiting the economy and the environment. As discussed in greater detail below, while LA ART is consistent with many of the goals and policies of the Draft Plan and the Draft Plan’s draft environmental impact report (“DEIR”) Project Objectives and language concerning increasing transit options and connectivity in the Plan area, we respectfully request that the Draft Plan and FEIR accommodate and acknowledge LA ART.

As one such change, given LA ART’s significant benefits as an environmentally friendly transit option that would provide a link between Downtown Los Angeles’ public transit hub and communities surrounding Dodger Stadium, we request that the Plan include a definition for “Aerial Rapid Transit” uses, or that the “Transit Terminal” use definition be revised to allow for aerial rapid transit, ensuring the Project is considered within the Plan. Consistent with this revision, the Draft Plan’s FEIR should consider LA ART in its discussion of existing Downtown neighborhoods. Details on these requests are set forth below, together with additional LA ART background.

Project Background and Benefits

As noted above, LA ART would directly link Dodger Stadium to Union Station, providing the first permanent public transit link to Dodger Stadium since it opened in 1962. LA ART offers the capacity to move approximately 5,500 people per hour per direction using environmentally friendly, zero-emission technology, removing game-day automobile traffic from neighborhoods including Chinatown, Elysian Park, Echo Park, and Solano Canyon, as well as SR-110 and other state highways.

The Project area is depicted below, and would begin with a station at Union Station and end at a station at Dodger Stadium.



The proposed route would primarily be over public right-of-way and travel generally from Union Station along Alameda Street, Spring Street, over the Los Angeles State Historic Park, Bishops Road, and over SR-110 to Dodger Stadium. As part of the environmental review process with Metro, and as detailed in the attached NOP, two potential alternative routes that could also provide transit service through an intermediate station located adjacent to the Los Angeles State Historic Park are being considered (the Spring Street Alignment and Broadway Alignment).

In the Spring Street Alternative, near the intersection of Spring Street and Ann Street, the aerial gondola route would head northwest with a Park Station on Spring Street and fly over the Los Angeles State Historic Park, as shown in the attached NOP.

In the Broadway Alternative, the aerial gondola system would fly over the Los Angeles State Historic Park near the Metro L Line (Gold) right-of-way, providing local transit service with an intermediate station at the intersection of North Broadway and Bishops Road, as shown in the attached NOP.

LA ART could remove up to 3,000 cars on Dodger game or event days, enhancing community safety and resulting in air quality improvements and GHG emissions reductions. In addition, LA ART's station at Dodger Stadium could provide additional connectivity for LA ART riders to access Elysian Park through public transit, which is not currently possible.

LA ART would attract new riders to the Metro system by providing a unique experience connecting to Dodger Stadium. It is envisioned that LA ART would serve existing residents,

workers, and visitors from local communities, as well as attract visitors and tourists from across the region and around the world.

LA ART Is Consistent with DTLA 2040 Draft Plan Goals and Policies and the Draft Environmental Impact Report's Objectives to Incentivize Transit

The Draft Plan's Guiding Principles and DEIR's Project Objectives Recognize the Importance of Transit and Improving Connectivity

LA ART is consistent with the Draft Plan's guiding principles for long-term priorities for the Downtown Community Plan. (Draft Plan, Chapter 1, p. 10.) For instance, one of the guiding principles is to "support and sustain Downtown's ongoing revitalization," by "promoting innovation for decades to come" and "reinforcing Downtown as a destination." (*Ibid.*) LA ART would utilize cutting-edge detachable gondola technology to provide a linkage within Downtown, from Union Station to the Los Angeles State Historic Park and Los Angeles River, while also attracting visitors and tourists to experience unique views of Downtown. LA ART seeks to develop partnerships with Chinatown and El Pueblo merchants and stakeholders to encourage dining and visits prior to games. In addition, the Project seeks to support Chinatown as a vibrant center of commerce, culture, and community. By starting the LA ART experience across from Union Station and El Pueblo, the birthplace of Los Angeles, LA ART can offer tourists an incredible introduction to the City of Angels, together with a narrated gondola ride highlighting the City's history. Accordingly, LA ART would be the exact type of innovative project the Draft Plan seeks to promote.

Similarly, the Draft Plan aims to "promote a transit, bicycle, and pedestrian-friendly environment," by "expanding transit service," and "improving connectivity" Downtown. (Draft Plan, Chapter 1, p. 11.) Likewise, DEIR Primary Objective 4 seeks to "[p]romote a mode-shift from private automobile usage and foster a transit, bicycle, and pedestrian supportive environment." (DEIR, p. 3-24.) LA ART would "expand transit service" and "promote a mode-shift from private automobile usage" by providing yet another transit linkage to Downtown between Union Station — housing Metrolink, Metro's Red, Gold, and Purple lines, the upcoming Regional Connector and supporting bus, and bicycle and pedestrian connections — and Dodger Stadium.

LA ART will be ADA accessible and compliant. The spacious cabins equipped with large sliding doors allow for wheelchairs, bicycles, and strollers, and easy entry and exit for passengers connecting to and from other modes of transit. LA ART's compatibility with bicycles would also support "bike infrastructure." (Draft Plan, Chapter 1, p. 11.) Further, LA ART could take approximately 3,000 cars off the road on Dodger game and event days, enhancing community and pedestrian safety to promote a "pedestrian-friendly environment." By removing these vehicles from the road, LA ART may reduce vehicle miles traveled, in furtherance of Primary Objective 5, which seeks to "[r]educe vehicle miles traveled to meet the goals of Senate Bill 375, Senate Bill 743, and California Assembly Bill 32 to reduce carbon emissions." (DEIR, p. 3-24.)

Accordingly, LA ART would support the Draft Plan's guiding principles by providing an innovative transit solution that connects Downtown and Union Station with other communities and attractions, while inviting visitors and tourists to experience Downtown in a unique manner.

The Draft Plan's Downtown-Wide Goals and Policies Encourage the Creation of Sustainable Transportation Options

LA ART is consistent with numerous Downtown-wide goals and policies supporting sustainable transportation options. Policy LU 1.1 seeks to "ensure the development of complete neighborhoods with diverse uses and resilient infrastructure, parks, streetscapes, transit, and community amenities." (Draft Plan, Chapter 2, p. 18.) LA ART would provide an additional transit option for community members to explore and visit areas of Downtown otherwise difficult to access. Further, LA ART's year-round operation opportunities would provide potential connectivity for residents, Cathedral High School transit patrons, and for Los Angeles State Historic Park and Elysian Park visitors, thus providing transit in furtherance of "complete neighborhoods."

LA ART Is Consistent with the Plan's Goal for Land Use That Supports Transit Access

The "Plan calls for efficient use of land that supports walking, bicycling, and access to transit, reducing energy consumption, and fostering environments for active and passive recreation." (Draft Plan, Chapter 2, p. 27.) The DEIR also emphasizes the importance of developing housing "near transit to reduce automobile reliance and improve mobility," (DEIR, p. 3-27) and "support[s] the development of new transit infrastructure" (*id.*, p. 4.10-27). The DEIR additionally states that the "Downtown Plan would enhance access to all modes in the local circulation system, improving access on transit, roadways, bicycle and pedestrian facilities." (DEIR, p. 4.10-48; see also *id.*, p. 4.15-40.) The Project would provide "new transit infrastructure" in Downtown, further increasing the ability for the City to locate housing near transit. LA ART would also provide an additional transit connection for existing communities such as El Pueblo, Chinatown, Mission Junction, and Solano Canyon to Union Station, "enhance[ing] access to all modes in the local circulation system." In addition, as discussed above, LA ART would "reduce automobile reliance" by providing a permanent transit connection to Dodger Stadium as an alternative to automobile use.

LA ART also would connect to "environments for active and passive recreation" such as the Los Angeles State Historic Park, the Los Angeles River, and Elysian Park, consistent with Metro's Transit to Parks Strategic Plan. LA ART is currently considering public benefits for the Los Angeles State Historic Park, including support for a pedestrian bridge between North Broadway and the Los Angeles State Historic Park, crossing over Metro's L Line, to provide access for walkers and bicycles who cannot access the Park directly from Broadway due to existing topography. An ADA accessible pedestrian/bicycle bridge would create additional connections between the Los Angeles State Historic Park and areas of Chinatown, Cathedral High School, and Solano Canyon, supporting park access as well as the Plan goal of "walking, bicycling, and access to transit."

In addition, LA ART's Dodger Stadium station could provide convenient connections to Elysian Park. Therefore, LA ART would support "walking, bicycling, and access to transit," and foster an environment for active and passive recreation by providing links to Downtown area parks. In addition, the Project would support the Plan's aim of providing access to transit by providing a high-quality and high-capacity rapid transit connection between Union Station and Dodger Stadium, potentially allowing more than 10,000 people to be transported to the stadium prior to the start of a game or event. LA ART could therefore take an average of 3,000 cars off the streets before and after each game or special event at Dodger Stadium.

LA ART Will Be Zero-Emission, Supporting the Plan's Goals to Reduce Greenhouse Gas Emissions and Improve Air Quality

LA ART has committed to goals to reduce GHG emissions and improve air quality; as a zero-emission project, LA ART will integrate sustainable and environmentally-friendly design features into its operations and maintenance, thus furthering the Plan's objective of reducing energy consumption.

Policy LU 17.9 calls for the Plan to "support local, regional, state, and federal programs seeking to reduce greenhouse gas emissions, in an effort to minimize pollution sources and to improve air quality." The DEIR also notes the Draft Plan is intended to "improve the efficiency and effectiveness of the transportation system and provide options for alternative transportation." (DEIR, p. 4.5-22.) As a zero-emission project, LA ART is consistent with these aims. Further, LA ART's goal to remove approximately 3,000 cars off the road on Dodger game and event days would reduce congestion and GHG emissions and improve air quality. LA ART may therefore provide emissions benefits and increased access to areas within the Draft Plan between Union Station and Dodger Stadium, including disadvantaged communities identified by CalEnviroScreen 3.0 as in the top 98% of California communities burdened by pollution. Accordingly, LA ART is consistent with the Draft Plan's Policy LU 17.9 to support efforts to reduce GHG emissions and improve air quality and the DEIR's stated intent to "improve the efficiency and effectiveness of the transportation system."

The Project Supports Downtown Places Goals and Policies

The Transit Core neighborhood includes Union Station. The Draft Plan recognizes that "[a]s the regional transportation system expands, the Station will continue to evolve as a transit center and a mixed use destination." (Draft Plan, Chapter 2, p. 31.) Policy LU 22.16 seeks to "[a]dvance efforts to plan for the future integration of high speed rail and other transit projects." (*Ibid.*) Union Station currently hosts 36 million people per year and 100,000 daily transit riders. Metro projections forecast 72 million people per year and 200,000 daily riders in 2040 due to Metro's expansive transit network. LA ART would provide yet another link to this transit center by providing a station in close proximity to Union Station, representing an effort to integrate rail with other transit projects in accordance with Policy LU 22.16. The proposed Union Station location would integrate with Metro's proposed Union Station Forecourt and Esplanade Improvements and provides connection to historic El Pueblo.

Other neighborhood policies are aimed at improving transit connections. (See e.g., LU 49.4, Draft Plan, Chapter 2, p. 45.) The Project would facilitate these policies by providing an additional transit option in Downtown. For instance, LA ART has the potential to connect El Pueblo, Union Station, Chinatown, the Mission Junction Area (including William Mead Homes), Cathedral High School, and Solano Canyon, in addition to the Los Angeles State Historic Park, the Los Angeles River, and Elysian Park. Providing access to Union Station via LA ART can increase regional connectivity and access with cleaner air for these communities, which are currently burdened by pollution.

With respect to the El Pueblo de Los Angeles Historic District (“El Pueblo”), Draft Plan LU 53.12 looks to “encourage more active nighttime uses.” (Draft Plan, Chapter 2, p. 47.) The Project would provide a link to El Pueblo before and after Dodger games, thus supplying additional visitors to the El Pueblo and incentivizing nighttime uses to capture these visitors. Therefore, the Project is consistent with—and indeed facilitates—the Draft Plan’s Downtown Places Goals and Policies.

The Project Is Consistent with the Draft Plan’s Mobility & Connectivity Goals and Policies

The Draft Plan’s Mobility & Connectivity chapter recognizes that “[p]roviding safe and convenient multimodal access throughout Downtown’s districts addresses several of the guiding principles of this Plan. A safe, accessible circulation system reinforces land use policies and connects people to jobs, homes, and services.” (Draft Plan, Chapter 3, p. 49.) Further, “safety and comfort for all users is a primary priority of the Downtown mobility system.” (*Ibid.*) The Project would support this overarching aim in several ways.

First, aerial rapid transit has an excellent safety record, and operations will include multiple measures to ensure rider and public safety. The proposed Project would employ a Tricable Detachable Gondola system (also known as “3S”), which allows for higher-capacity cabins to safely and efficiently transport passengers. The naming convention for this system is derived from the German word “seil”, which translates in English to “rope”. Hence, Tricable Detachable Gondola systems are known as “3S” systems due to its use of three ropes, or cables.

Second, beyond ensuring the safety of riders, LA ART would enhance community and pedestrian safety by removing car trips from local streets and arterials surrounding Dodger Stadium. Further, the Project would provide “comfort for all users” because it is ADA accessible and compliant. The spacious cabins equipped with large sliding doors allow for wheelchairs, bicycles, and strollers, and easy entry and exit for passengers.

Third, the Project would provide “convenient” access to other areas of Downtown, such as El Pueblo, Union Station, Chinatown, the Mission Junction area (including William Mead Homes), Cathedral High School, and Solano Canyon, in furtherance of the Draft Plan’s Mobility & Connectivity chapter’s overarching intent. When complete, the proposed Project’s capacity would accommodate up to approximately 5,500 people per hour per direction, and the travel time from Union Station to Dodger Stadium would be approximately 7 minutes. Accordingly, LA ART would be able to reliably and efficiently operate at a high capacity, providing a convenient transit option.

More specifically, the Project supports the Draft Plan's goals and policies concerning mobility and connectivity. MC Policy 2.5 seeks to "[f]acilitate integration between different modes of travel to create a seamless experience as users switch between modes and to promote transit use and active transportation." (Draft Plan, Chapter 3, p. 50.) Draft Plan Goal 4 looks to provide a "safe and integrated bicycle network that provides access to transit and key destinations." (Draft Plan, Chapter 3, p. 51.) LA ART's cabins will also be large enough to accommodate bicycles, with large sliding doors to easily transport bicycles on and off the cabins. LA ART would connect to Union Station, and provide a mobility hub at Dodger Stadium for passengers to be able to access a suite of first and last mile multi-modal options, including a bike share program and individual bike lockers, a pedestrian connection to Dodger Stadium, and connections to Elysian Park and adjacent neighborhoods. Accordingly, LA ART would "facilitate integration between different modes of travel," and further the City's bicycle network. For the same reasons, LA ART would be consistent with the DEIR's language supporting "first-mile, last mile solutions" (DEIR, p. 4.1-46; *id.*, p. 4.15-40) and Draft Plan Policy MC 4.4, which aims to "[f]acilitate the integration of bikes on transit to improve first-last mile connections," (*ibid.*) and would support the Draft Plan's ability to engage in Metro's "First-mile, Last-mile" program, which provides "implementing improvements for first and last mile (FLM) portion[s] of an individual's trip, and provides a vision for addressing FLM improvements in a systematic way." (Draft Plan, Chapter 5, p. 70.)

MC Policy 2.6 aims to "[i]mprove access to community services and amenities such as recreational facilities [and] cultural and educational institutions." (Draft Plan, Chapter 3, p. 50.) As discussed above, LA ART would provide access to the historic El Pueblo. Likewise, LA ART may provide transit connectivity to Cathedral High School transit patrons, and for Los Angeles State Historic Park, Los Angeles River, and Elysian Park visitors. By providing an additional transit link to these locations, LA ART would "improve access to . . . recreational facilities" and "cultural and educational institutions." As such, LA ART would be consistent with the Draft Plan's applicable goals and policies concerning mobility and connectivity.

Aerial Rapid Transit Should Be Considered a Permissible Use Under the Plan

The Draft Plan does not currently contemplate aerial rapid transit. The Draft Plan includes use definitions for uses contemplated under the Draft Plan. (See e.g., Draft Plan, Zoning Code Draft, pp. 5-153 to 5-173.) The closest use included within the Draft Plan to LA ART is for "Transit Terminal." (See *id.*, p. 5-160.) "Transit Terminal" is defined as "[a]ny facility such as a bus or train station, where ground transport regularly load and unload passengers." (*Ibid.*) This definition should be broadened to cover LA ART, which is an aerial rapid transit system.

As discussed above, LA ART proposes an innovative and sustainable method of connecting Downtown to Dodger Stadium and surrounding communities, in furtherance of the Draft Plan's guiding principles, goals, and policies. To account for this innovative, environmentally friendly rapid transit gondola system, we request that the Draft Plan be revised to provide for aerial rapid transit. We request that the Draft Plan add a new subdivision (F) to Draft Zoning Code Section 5C.1.4's Transportation Uses for "Aerial Rapid Transit," defined as

“an aerial gondola system consisting of cables, passenger stations and/or non-passenger junction(s), tower(s), and gondola cabins.”

In the alternative, the City could revise the definition of “Transit Terminal” to include accommodate aerial rapid transit under the Plan as follows, with deletions in ~~striketrough~~ and additions in underline:

“Transit Terminal” – Any facility such as a bus, ~~or train,~~ or aerial rapid transit station, where ~~ground~~ transport regularly loads and unloads passengers.

The new “Aerial Rapid Transit” use or the revised “Transit Terminal” use should be permitted in all zones throughout the Draft Plan to ensure that innovative, environmentally friendly rapid transit gondola systems such as LA ART are permitted in the Plan area to allow for placement of gondola stations, junctions, and towers in public right-of-way and public and private property, as well as cables and cabins above the ground. Currently, the RX1 Use District does not permit “Transit Terminal,” and is within the location of LA ART’s proposed alignments.

Similarly, the Draft Plan should remove any roadblocks that would hinder the development of transit. For instance, for projects under the Draft Plan’s Community Plan Implementation Overlay (“CPIO”), the Draft Plan requires the issuance of a building permit for replacement development prior to the issuance of a demolition permit. (Draft Plan, CPIO, p. 9.) Such a requirement places an unnecessary burden on the ability to quickly and efficiently proceed with development in furtherance of the Plan’s goals.

Consideration and inclusion of aerial rapid transit as a permitted use in the Draft Plan is appropriate at this time given Metro’s undertaking of CEQA review for the Project. Aerial rapid transit is a proven, safe, sustainable, high capacity, and highly efficient form of transportation that would function as both a reliable rapid transit system and first/last mile connector, and would serve as an iconic new regional tourist attraction that offers scenic views of Los Angeles, in furtherance of the Draft Plan’s goals and policies.

The FEIR Should Consider LA ART as a Future Transportation Improvement

Consistent with the addition of aerial rapid transit as a permitted use in the Draft Plan, the FEIR should include LA ART when addressing future transit improvements in the Plan area.

For instance, the DEIR notes the “development of future plans and infrastructural improvements that need to be accommodated” in the Draft Plan since the adoption of the existing Central City and Central City North Community Plans, including the “Los Angeles Streetcar, Metro Regional Connector, and High Speed Rail.” The FEIR should include LA ART as a potential future transit improvement in the Plan area, in order to ensure the Plan appropriately “responds to these new conditions and . . . maximize[s] associated benefits from these large scale infrastructure improvements.” (DEIR, p. 3-9.)

Further, the Land Use and Planning section describes El Pueblo and Union Station, noting that Union Station is the “planned site for the California High Speed Rail (HSR) Los

Angeles station.” (DEIR, p. 4.10-3.) The FEIR should also include a reference to the proposed LA ART stations. Like the High Speed Rail station, LA ART is in the planning and environmental phases (the DEIR notes that “the High Speed Rail Station appears unlikely to be built in the foreseeable future”). (*Id.*, p. 4.10-26, fn 3.) The DEIR also notes that the Draft Plan “support[s] the development of new transit infrastructure,” and discusses the high speed rail and “other transit projects, such as the West Santa Ana Branch line and Link US” that would “reinforce Union Station and Downtown as the hub of regional transit.” (*Id.*, p. 4.10-26.) LA ART provides an additional transit connection to Union Station for Downtown neighborhoods. Therefore, the Draft Plan and FEIR should include LA ART in its efforts to integrate future transit projects within the Plan area.

Conclusion

We thank you for your time and attention to this matter, please do not hesitate to contact me should you have any questions.

Very truly yours,



Beth Gordie
of LATHAM & WATKINS LLP

Cc: Shana Bonstin, Deputy Director of Planning
Lisa Webber, Deputy Director of Planning
Valerie Watson, Senior City Planner
Aerial Rapid Transit Technologies LLC
Cindy Starrett, Latham & Watkins
Samantha Seikkula, Latham & Watkins



NOTICE OF PREPARATION OF A DRAFT ENVIRONMENTAL IMPACT REPORT

DATE: October 1, 2020
TO: Agencies, Organizations and Interested Parties
SUBJECT: Notice of Preparation (NOP) of a Draft Environmental Impact Report
PROJECT TITLE: Los Angeles Aerial Rapid Transit Project
FROM: Los Angeles County Metropolitan Transportation Authority (Metro)

Los Angeles Aerial Rapid Transit Technologies LLC is proposing the Los Angeles Aerial Rapid Transit Project, which would connect Los Angeles Union Station to the Dodger Stadium property via an aerial gondola system in downtown Los Angeles. The Los Angeles County Metropolitan Transportation Authority (Metro) is the lead agency in the preparation of a Draft Environmental Impact Report (EIR) for the Los Angeles Aerial Rapid Transit Project (proposed Project) in accordance with the California Environmental Quality Act (CEQA) statutes and guidelines, as amended (Public Resources Code, Section 21000-21178 and California Code of Regulations Title 14, Chapter 3 Section 15000–15387). The purpose of the Draft EIR is to evaluate the potential for environmental impacts associated with implementation of the proposed Project, and to provide mitigation measures where required.

The purpose of this Notice of Preparation (NOP) is to notify agencies, organizations and individuals that Metro plans to prepare a Draft EIR and to request input on the environmental analysis to be performed. Metro is requesting comments from public agencies on the scope and content of the environmental information relevant to their statutory responsibilities with regard to the proposed Project, in accordance with California Code of Regulations, Title 14, Section 15082(b). Metro is also inviting organizations and interested parties to submit comments on the scope of the environmental document related to the proposed Project.

PROJECT DESCRIPTION: The proposed Project would connect Los Angeles Union Station (LAUS) to the Dodger Stadium property via an aerial gondola system, reducing traffic congestion and expanding mobility options for transit riders. The proposed Project would provide an aerial rapid transit option from LAUS for visitors to Dodger Stadium, as well as the Los Angeles State Historic Park and Elysian Park, while reducing traffic that currently impacts residents of surrounding communities, who can also utilize the aerial gondola system to access the regional transit system accessible at LAUS. The proposed route would travel generally along Alameda Street, Spring Street, and Bishops Road from LAUS to Dodger Stadium. The proposed Project includes options for an intermediate station to provide additional transit service adjacent to the Los Angeles State Historic Park and the location where the proposed Project flies over portions of the Park (the Spring Street Alternative and Broadway Alternative). The proposed aerial gondola system would include aerial cables, passenger stations, a non-passenger junction, towers to support the aerial cables between the stations/junction, and gondola cabins for the passengers. When complete, the proposed Project would have a maximum capacity of approximately 5,500 people per hour per direction, and the travel time from LAUS to Dodger Stadium would be approximately six or seven minutes. Public benefits being considered for the proposed Project include support for a pedestrian bridge between North Broadway and the Los Angeles State Historic Park.



Figure 1 shows the regional location of the proposed Project and Figures 2 and 3 provide an overview of the Spring Street Alternative and Broadway Alternative, respectively. Figure 4 provides examples of modern aerial rapid transit (ART) systems that are currently operating in several urban locations around the world.

PROJECT LOCATION AND ENVIRONMENTAL SETTING: The proposed Project would be located in the City of Los Angeles, within or adjacent to the communities of El Pueblo, Union Station, Chinatown, Mission Junction, Solano Canyon, and Elysian Park. The proposed Project would generally be located within the public right-of-way, and in connection with providing additional transit service adjacent to the Los Angeles State Historic Park, would fly over the Park, which is managed by the California Department of Parks and Recreation, and SR-110 near Dodger Stadium. The surrounding land uses include high and medium density residential, commercial, retail, institutional, transit-related infrastructure (road and rail), parks and open space, and public facilities uses.

PROJECT PURPOSE: The overall purpose of the proposed Project is to expand mobility options for transit riders through a permanent direct transit connection between LAUS and Dodger Stadium, a regional event center, via an aerial gondola system. The proposed Project aims to reduce traffic congestion and associated greenhouse gas emissions during game and special event days. The proposed Project provides the potential to increase transit access for open space, parks, and the surrounding communities by linking to the Los Angeles State Historic Park, Elysian Park, and the region's rapidly growing regional transit system at LAUS. Aerial rapid transit is a proven, safe, quiet, sustainable, high capacity, and highly efficient form of transportation. The proposed Project would function as a reliable rapid transit system, a first/last mile connector, and an iconic new regional tourist destination that offers scenic views of Los Angeles.

PROJECT ALTERNATIVES: A "No-Build" alternative will be analyzed, where no aerial gondola system is installed. Alternative locations for passenger stations, a non-passenger junction, and towers, as well as potential arrangements within a non-passenger junction to allow for passengers, may be evaluated.

The proposed Project would generally be located in the public right-of-way and would commence adjacent to LAUS and El Pueblo following Alameda Street and Spring Street in a northeast direction through the community of Chinatown, flying over the Los Angeles State Historic Park to Bishops Road and then flying over the SR-110 and terminating at Dodger Stadium, located in the community of Elysian Park. Two potential alternatives for providing transit service adjacent to, and flying over the Los Angeles State Historic Park, are being considered. In the Spring Street Alternative, near the intersection of Spring Street and Ann Street, the aerial gondola system would travel northwest with a Park Station on Spring Street and fly over the Los Angeles State Historic Park near the Metro L Line (Gold) right-of-way (see Figure 2). The Broadway Alternative would fly over the Los Angeles State Historic Park near the Metro L Line (Gold) right-of-way and continue northwest to an intermediate station at the intersection of North Broadway and Bishops Road (see Figure 3).



PROBABLE ENVIRONMENTAL EFFECTS: The purpose of the Draft EIR is to disclose the impacts of the proposed Project on the environment. The Draft EIR will address all environmental topics listed in Appendix G of the CEQA Guidelines, as listed below.

- Aesthetics
- Agriculture and forestry resources
- Air quality
- Biological resources
- Cultural and historic resources
- Energy
- Geology and soils
- Greenhouse gas emissions
- Hazards and hazardous materials
- Hydrology and water quality
- Land use and planning
- Mineral resources
- Noise
- Population and housing
- Public services
- Recreation
- Transportation
- Tribal cultural resources
- Utilities and service systems
- Wildfire

Mitigation measures to reduce potentially significant impacts during construction and operation of the proposed Project will also be identified in the Draft EIR.

VIRTUAL OPEN HOUSE AND VIRTUAL SCOPING MEETING: As part of the EIR scoping process, project information will be made available to the public online through two primary means: (1) a virtual “open house”; and (2) a virtual scoping meeting. The purpose of the virtual open house is to provide an overview of the proposed Project, an overview of the CEQA process, and the project timeline for environmental review. The virtual open house will be accessible to stakeholders and the public throughout the public review period. Please access the virtual open house at LAARTvirtualopenhouse.org or through Metro’s website at metro.net/aerialrapidtransit.

The virtual scoping meeting will be held on October 22, 2020, from 6:00 p.m. to 8:00 p.m. The virtual scoping meeting will include an introduction to the proposed Project, an overview of the CEQA process, and the project timeline for environmental review. Stakeholders and the public may submit questions during the online meeting. A recording of the scoping meeting will be posted on the Metro website and the virtual open house following the meeting. Please check Metro’s website at metro.net/aerialrapidtransit to confirm the availability of and the instructions for accessing the virtual scoping meeting.

This NOP and a fact sheet will also be available in Spanish and Cantonese via the virtual open house at LAARTvirtualopenhouse.org and Metro’s website at metro.net/aerialrapidtransit. In addition, Spanish and Cantonese interpretation will be available during the virtual scoping meeting.

Attendees are invited to call 213-418-3423 at least 72 hours in advance of the meeting for more information, to arrange ADA accommodations and/or to request additional translation support.

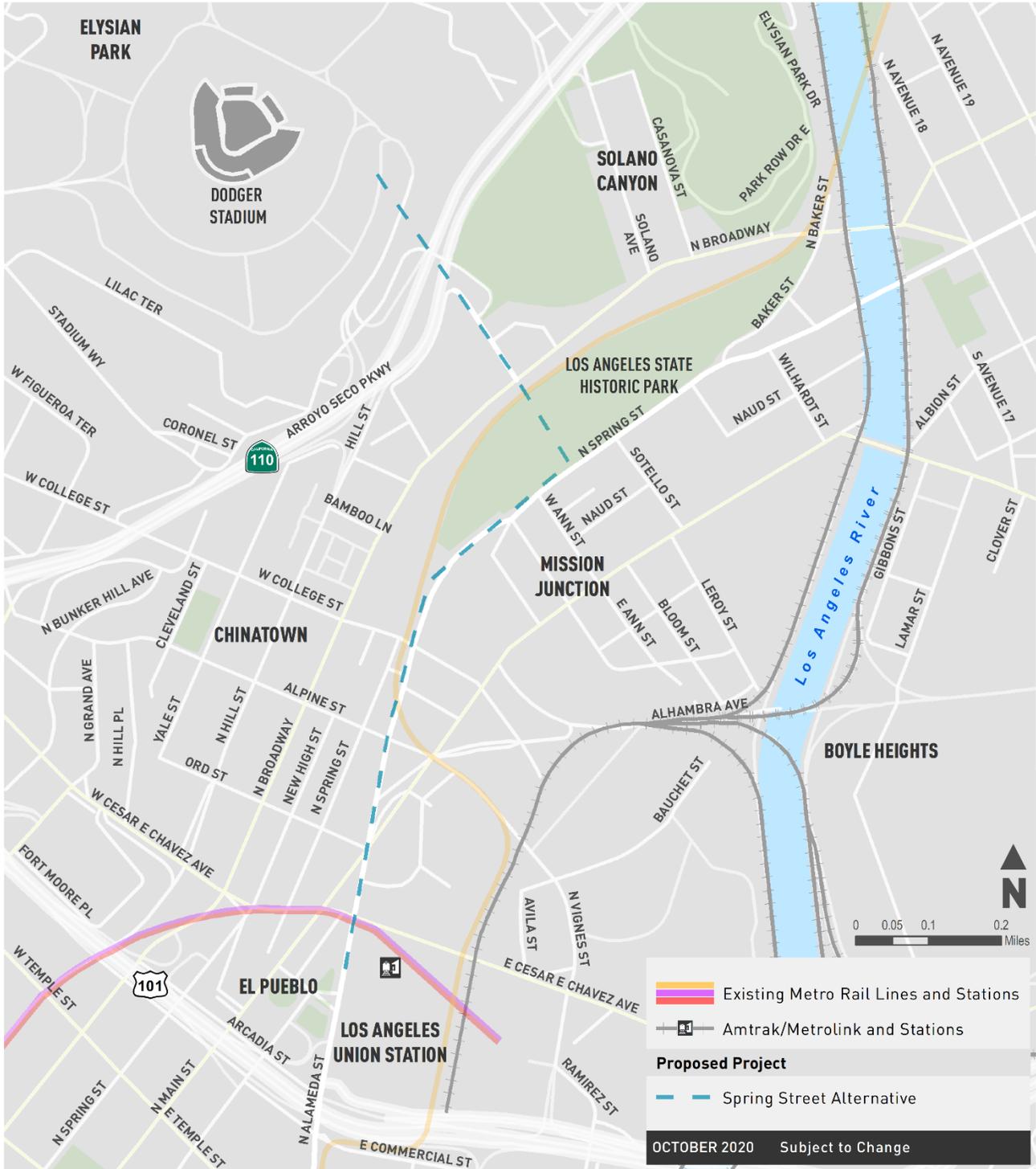


Metro

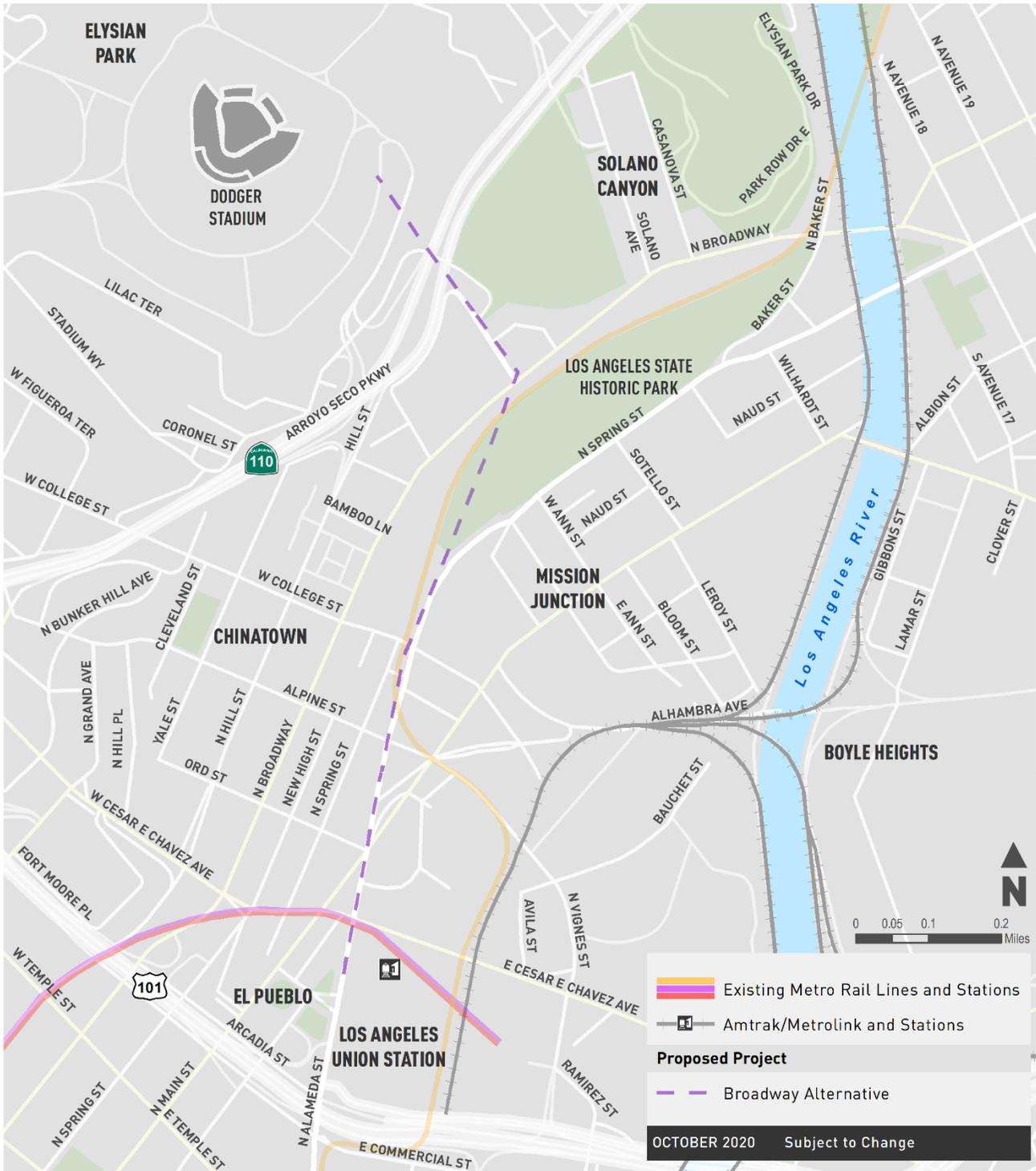
COMMENT DUE DATE: A 45-day comment period for this NOP will begin on October 1, 2020, and conclude on November 16, 2020. Written comments on the scope of the Draft EIR, including the Project area and description, the impacts to be evaluated, and the methodologies to be used in the evaluation, will be accepted during the comment period and should be sent to Metro by 11:59 pm PST on **November 16, 2020** at the postal address or e-mail address below. Comments may also be submitted through the virtual open house website at LAARTvirtualopenhouse.org.

ADDRESSES: Written or electronic (e-mail) comments may be sent to Mr. Cory Zelmer, Deputy Executive Officer, Metro, One Gateway Plaza, Mail Stop 99-22-6, Los Angeles, CA 90012, or via email at LAART@metro.net.

For more information, please visit metro.net/aerialrapidtransit, or please call 213-418-3423.



**Figure 2:
Proposed Spring Street Alternative**





Portland, Oregon



London, England



Koblenz, Germany



Roosevelt Island, New York



Mexico City, Mexico



Lantau Island, Hong Kong



La Paz, Bolivia





Brittany Arceneaux <brittany.arceneaux@lacity.org>

DTLA 2040 Public Hearing comment

Tom Grode <manoftheseatom@gmail.com>
To: Downtownplan@lacity.org

Wed, Dec 9, 2020 at 3:08 PM

My name is Tom Grode. I'm sending this to you as my personal Public Hearing input as a Skid Row advocate and former resident who lived in Skid Row from 2013 to 2017. My input is also coming to you in group forms. I might submit additional personal input prior to the January deadline. After ten years of advocacy, I was invited to become an honorary Tongva in a sacred ceremony. My Native name is Woorypot Moompet. The purpose of this input email is to highlight the significance of Land Acknowledgments in the context of Land Use Policy.

This is from my comment yesterday at the Public Hearing zoom: "Climate Conversations was part of the DTLA 2040 Open House last year in November. In the November revision, several recommendations under Wellness and Sustainability address Climate Change including three that specifically reference the Urban Heat Island effect. The Skid Row Now and 2040 coalition recognizes that poor communities and communities of color bear the fruit of climate change and so special attention must be made to the vulnerabilities of Skid Row residents both housed and unhoused. Proposed resiliency centers must be open 24/7 in Skid Row. Based on our analysis of the November draft, here is our talking point number four — We want the plan's commitment to "facilitate the integration of locally produced and community oriented public art projects and cultural programming into public spaces to reinforce community character", to include consistent maintenance and additional amenities like hygiene stations, cooling stations, trees, shade structures and seating to occur at the Skid Row parks including San Julian Park and Gladys Park, and we want the creation of new Skid Row parks where possible. We also want this street safety and comfort investment on primary corridors in Skid Row (San Pedro, 3rd, 4th, 5th, 6th, and 7th streets).

I want to highlight that you received a letter regarding trees from Skid Row Resident Katherine McNenny of Industrial District Green December 3rd. Back in September we had terrible heat waves and smoky air due to the fires. Katherine and I exchanged emails where I felt she raised an excellent concern: that LACPC (Los Angeles Service Providers Collaborative) should be doing advanced summer planning given their access to resources and how government representatives come to their monthly meetings.

I reached out to Stephany Campos, Board member of LACPC and Director of the Skid Row Community Refresh Spot, and from that has emerged a planning effort for next summer, *Skid Row Cooling Resources*. Here is a Land Acknowledgment I wrote for this effort:

Skid Row is a unique Urban Heat Island in the midst of Downtown Los Angeles as an Urban Heat Island. As year after year the summer temperatures continue to rise more and more in the day, what man has made captures the heat and releases it during the night.

We Acknowledge the Land beneath what man has made.

We Acknowledge the Tongva, Native indigenous people of Los Angeles, and their ancient village Yaangna, what we call Downtown Los Angeles.

We Acknowledge Biddy Mason as the "patron saint" of Downtown Los Angeles, a former slave who became a Matriarch of early Los Angeles. Biddy Mason was a wealthy landowner and philanthropist to the poor and those in need.

We Acknowledge the Native indigenous people of Los Angeles, their special relationship with Mother Earth, and their hospitality, inviting us into that special relationship.

We Acknowledge the patience, kindness, and compassion of Mother Earth.

In a PowerPoint a few months ago to show the importance of Shade, Katherine referenced a report *The Effects of Historical Housing Policies on Resident Exposure to Intra-Urban Heat* that shows the relationship between the Urban Heat Island effect and Redlining. A couple years ago two DLANC Board members spoke about an Affordable Housing Only Zone being a modern form of Redlining. In the PowerPoint *The Voices of Central City East*, Skid Row Housing Trust CEO Lee Raagas also talks about such a Zone as a form of Redlining.

I'm part of Urban Voices Project, a community choir in Skid Row. For our events, I've written or co-written four or five different Land Acknowledgments. Here is one in the process of being written for an upcoming Holiday Zoom show on December 12. It's the only part of the show also being translated into Spanish.

A Holiday Called Home Land Acknowledgment

At this moment of uplifting the voices of the Skid Row community, with the premiere of this original song, Urban Voices Project is taking a moment to acknowledge the Tongva peoples as the traditional inhabitants and land caretakers of Tovaangar (Los Angeles Basin and Southern Channel Islands). We specifically acknowledge their ancient village Yaangna, what we call Downtown Los Angeles.

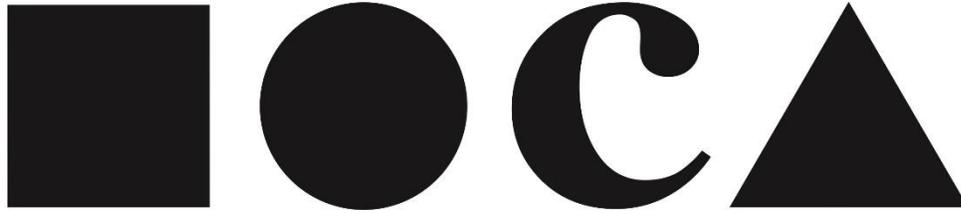
In this gathering, we show up, with intention, for the rights and dignity and legacy of the Indigenous Peoples of Los Angeles - also we acknowledge the Mexican heritage of this land - by offering the acknowledgement in English and Spanish.

We introduce the following Land Use Policy Advocacy in Skid Row - that is happening right now - as part of our commitment to do something active toward positive change in our relationship with this people and this land.

Through Urban Renewal in the 1960's, all the housing in Bunker Hill was destroyed to make way for the massive skyscrapers we see today. In response, most of the Skid Row hotel housing was protected and renovated for unhoused folks. City Hall is now updating the Downtown Community Plan. This means updating Land Use Policy and zoning to implement the policy. Acknowledging the Land includes acknowledging Land Use Policy. One third of Skid Row is proposed by City Planning to be an Affordable Housing Only zone. We want that zone for all of Skid Row and so we recently made a public comment video saying Free the Squeeze: expand the Affordable Housing Only Zone in Skid Row.

The land of Skid Row is worth billions of dollars and so we stand in solidarity with Skid Row for a future of Justice and Equity.

My suggestion is DTLA 2040 consider both a Land Acknowledgment in the beginning text of the Community Plan and to encourage ongoing Land Acknowledgments as a Best Practice.



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*Ex-Officio

December 4, 2020

Brittany Arceneaux, City Planner
Department of City Planning
City of Los Angeles
200 North Spring Street, Room 667
Los Angeles, CA 90012
Via email: brittany.arceneaux@lacity.org

Re: Comments on ENV-2017-433-EIR: DTLA 2040 Draft Environmental Impact Report (DEIR)

Dear Ms. Arceneaux,

We, The Museum of Contemporary Art (“MOCA”), are writing this letter as longtime Bunker Hill and Downtown Los Angeles stakeholders. The MOCA-owned site in Bunker Hill is located at 232-256 S. Grand Avenue in Downtown Los Angeles (the “Grand Avenue Site”).

Established in 1979, MOCA is the only artist-founded museum in Los Angeles. We are dedicated to collecting and exhibiting contemporary art. We house one of the most important collections of contemporary art in the world, comprising roughly 7000 objects, and have a diverse history of ground-breaking, historically-significant exhibitions. Importantly, we recently made the museum entry free to the public, reinforcing our position as a critical and accessible cultural institution in the Los Angeles region. The museum on Bunker Hill in Downtown Los Angeles has been a mainstay cultural attraction for 40 years and will continue to be a public resource and attraction in Los Angeles.

We have reviewed the Draft DTLA 2040 Plan (“Plan”) and the associated Draft Environmental Impact Report (“DEIR”). The following commentary represents MOCA’s feedback on the Plan based on our experience and vision for the future of MOCA’s museum on the Grand Avenue Site.

Pedestrian Easement

Do not require a pedestrian easement through the Grand Avenue Site.

The Plan’s proposed Community Plan Implementation Ordinance (“CPIO”) implements a maintenance program for existing pedestrian linkages in Bunker Hill, including an identified existing pedway system on the Grand Avenue Site. Per the CPIO, this existing pedestrian walkway on the Grand Avenue Site must be maintained unless an equivalent pedestrian easement is provided within a new project, subject to the Director of Planning’s approval. Any future development of the Grand Avenue Site would be required to accommodate this existing pedestrian walkway in the proposed design.

While the Plan's goal to maintain pedestrian circulation systems throughout Bunker Hill is a noble one, the requirement to maintain or replace this pedestrian walkway on the Grand Avenue Site totally undermines the full future development potential of the site and would preclude future museum expansion. MOCA's gallery space is already limited as compared to comparable museums, so we will need to expand in order to grow with the community and remain relevant to all of Los Angeles. The ability to create a feasible museum expansion project outweighs the need to maintain the pedestrian access through the Grand Avenue Site. Removing this pedestrian walkway requirement would not inhibit the walkability or pedestrian-friendly nature in Bunker Hill. There are ample pedestrian amenities and public open space in the immediate area, such as the courtyards at Cal Plaza and the Omni Hotel, just to name two.

For this reason, we strongly believe that the Plan should be amended to remove the requirement to maintain a pedestrian walkway through the Grand Avenue Site.

Design Restrictions

Simplify design restrictions to allow for iconic building design.

The Plan would create highly-specific design requirements for buildings in the Plan area, including Bunker Hill. The Plan's proposed development and design standards are very prescriptive and would inhibit an innovative and creative building design. Iconic buildings in Bunker Hill, such as Disney Hall or the Broad Museum, which have come to define Los Angeles' cultural community and attract local and worldwide tourism into the City would simply not be feasible under the Plan's proposed design constraints. Indeed, even our existing building on Grand Avenue, which was designed by the world-famous, Pritzker Prize winning architect Arata Isozaki, would have been prohibited by the Plan. Design standards that are far too prescriptive, such as those in the Plan, are shortsighted; they will squash creative approaches to design and architecture and put a damper on future fundraising for exceptional development. As such, we believe that the Plan's design restrictions be significantly simplified and streamlined to allow for exceptional, world-famous iconic building designs, especially in the Bunker Hill area.

Conclusion

For the reasons stated above, MOCA does not support the Plan as currently proposed. We strongly urge the Los Angeles Department of City Planning to reconsider these proposed zoning regulations applicable to the Plan area and Bunker Hill specifically and instead consider the alternatives outlined in this letter. We appreciate your time and consideration.

Sincerely,



Klaus Biesenbach
Director
Museum of Contemporary Art



Maria Seferian
Chair, Board of Trustees
Museum of Contemporary Art

City of Los Angeles, Department of City Planning
ATTN: Bryan Eck, City Planner
Case Numbers:
CPC2017 432CPU; ENV2017 433EIR
200 N. Spring Street, Room 667
Los Angeles, CA 9001

This is the response of Allan Harris and Cheryl Younger, 108 West 2nd Street Unit 1002, Los Angeles CA 90012, to the request for comments about the preparation of an EIR for the Central City Community Plan and new Zoning Code. The Higgins Building is located at 108 West 2nd Street. Built in 1910 as a classic Beaux Arts building, it is a Cultural monument of the City of Los Angeles. The Building consists of 135 residential condominium units and seven commercial units.

1. Community Plan.

A. We object to the inclusion of the Higgins Building in the Central City Community Plan as part of the Transit Zone, urging that it is properly included in the Traditional Zone. Argument in support of this position is attached in the Letter of Allan Harris to Bryan Eck of the Los Angeles Department of City Planning dated February 20, 2017, attached as Exhibit "A" hereto.

B. Creation of a Bradbury, St. Vibiana, St. George Hotel, Higgins Building, City Hall Historic District.

We believe that the city should create a Bradbury, St. Vibiana, St. George Hotel, Higgins Building, City Hall Historic District. Argument in support of this proposal is contained in a monograph written by Allan Harris, Chair of the Higgins Loft Neighborhood Impact Committee, attached hereto as Exhibit "B" hereto.

2. Scope of EIR. The following planning concerns should be addressed in the EIR:

A. Parking. The recent building of large buildings downtown has reduced the number of accessible and affordable parking facilities for downtown residents. The Department of City Planning should consider the demand for future parking which is available and affordable. The creation of a Municipal Parking Authority should be considered.

B. Population size and density. The optimal population and density for a fully built downtown should be considered and achieved. Overbuilding and the Manhattanization of downtown should be avoided. The tipping point of building

and population growth beyond which the quality of life deteriorates should be addressed.

C. Control of excessively tall buildings. Downtown is sufficiently built up that each section of the downtown has its own scale and character. Out of scale buildings that destroy the character of individual sections should be avoided.

Additionally, the effect of large and tall buildings on air quality, air flow and future climate temperature increase should be considered.

D. Increased Community control over development. The profit concerns of developers should not dictate what gets built. Community opinion as to design, size, scale and amenities should be given a voice. Giving greater voting control to Neighborhood Councils as to these matters would help.

E. Protecting the aesthetics of City Hall. Recent proposals in the area of City Hall of buildings far in excess of the height of City Hall, 28 stories, are troubling. The City Hall is a wonderful aesthetic feature of Los Angeles. Not only just in many movies, it stands perpetually as a splendid example of our city and its architectural beauty. Restrictions against buildings of the size that would mar its majesty in our skyline and view shed should be prohibited.

Respectfully Submitted,

Allan Harris
Cheryl Younger

Allan Harris is a licensed attorney of the states of New York and New Jersey, a retired New Jersey Municipal Court Judge, and served as attorney to the Paterson New Jersey Zoning Board of Adjustment. He is also chair of the Higgins Loft Neighborhood Impact Committee

Cheryl Younger is an internationally exhibited Art Photographer and an M.A., M.F.A. from the University of Iowa. She has been associated with, inter alia, Columbia University in New York and New York University,

EXHIBIT "A"

Dear Mr. Eck,

February 20, 2017

It was a pleasure to meet you last Thursday at the Scoping Meeting on the Downtown Plan environmental impact report meeting. With reference to our discussion and my written and oral request the the Higgins Building being placed in the Traditional Core and not the Transit Core, I recall your concerns that there was not "enough teeth going northward from Fourth Street to embrace the Higgins Building" (Forgive me if my paraphrase might be inaccurate).

The heart of the Traditional Core as expressed in the language of this zone by the City Planning Department is that it is a "Rich collection of historically significant buildings." Historically, the Higgins building in my opinion has been erroneously excluded from being in the Historic Core. My review of the buildings included in the Traditional zone if you extend it northward from Fourth Street to 2nd Street running from the west side of Broadway to Los Angeles Street encompasses a wealth of historically significant architectural treasures:

1. Our Higgins Building at 2nd and Main, a Cultural Monument of Los Angeles, for which we will be applying for registration on on the National Register of Historic Places. This is one of the premier examples of Beaux Art Architecture west of the Mississippi.
2. St. Vibiana across the street built in 1876, a masterpiece of Italianate architecture which is on the National Register.
3. The Bradbury Building at 3rd and Broadway, which is on the National Register and certainly one of the most unique old buildings in downtown Los Angeles.
4. The St. George Hotel built in 1903, just east of Main Street on 3rd.
5. Grand Central Market, on Broadway near 3rd, flourishing since 1917 as a unique market place and downtown tourist attraction.
6. Million Dollar Theater, just North of the Grand Central Market, built in 1917, is the Grand Daddy of opulent downtown theaters.
7. The Douglas Building on Spring just north of 3rd, built in 1898, is one of the oldest adaptive reuse buildings in downtown.
8. Biddy Mason Park, at 333 S. Spring Street is an historic pedestrian park chronicling the achievement of the African-American 19th Century midwife and Philanthropist, Biddy Mason.
9. The Downtown Independent Theater at 251 S. Main Street, built on the bones of the old Arrow Theater, in 1925, where there has been a theater since that time.

10. The 5 story "Pope of Broadway" mural of Anthony Quinn, just restored on the Victor Clothing Building at 240 South Broadway, while painted in 1984, certainly adds coloratura to the area.

In sum, the area I argue should be part of the Traditional core certainly meets the Planning Department's historically significant criteria for this zone. I would ask that you revisit this request and change your zone classification to include this area.

Thank you,

Allan Harris
Chair
Higgins Loft Neighborhood Impact Committee

EXHIBIT "B"

City Planners:

A call for a Bradbury, Vibiana, St. George Hotel, Higgins, City Hall Historic District.

Downtown Los Angeles is a precious, fragile area. It has historic jewels which if not cared for properly will be forever lost. If you look at St. Vibiana's Cathedral today, you will see a perfect example of careless planning. The beautiful 1876 Italianate church has been dwarfed and eaten up by an eight story modern "money-strocity" apartment building sandwiched next to it on its Southside.

Across the street, Joe's Auto Park, has served a 30-day wrecking ball notice on the Independent Theater, a performance space with roots back to 1925, The Smell, the Iconic Indie music venue, and the Nueva Jalisco, the first and only Latino Vaquero Gay Bar in the city. What's in store for these historic properties does not require a gaze into a Chrystal ball. With 30 plus story high rise developments on the drawing boards for 4th and Hill, and 4th and Broadway, you can visualize the next megalopian high rise sweeping away these treasures with the building of another mindless giant.

Just to the North stands the majestic Los Angeles City Hall, immortalized in not only countless movies, but in beautiful continuity to the mesmerized gaze of our community. Stand atop the plaza at the Chandler Opera House and look east to the triumph of Grand Park as it sweeps down the mall culminating in City Hall. The park and mall are examples of planning at its most successful level. Walk south from City Hall and view the Los Angeles Police Administration Building and the Cal-Trans Building, heartening examples of contemporary architecture.

Cross the street, and the Higgins Building, a Los Angeles Cultural Historic Monument, a classic example of Beaux Arts Design constructed in 1910, stands proudly at the corner of 2nd and Main.

This is all a wonderful patrimony; but if Joes's Lot building plans between Spring and Main and for most of that area between 2nd and 3rd, destroys the smaller historic buildings and erects a sterile, high rise behemoth on that large lot, consider the irreparable damage in the context of city aesthetics.

Will there be a giant high rise rival that impairs the view and singular majesty of City Hall. Will the Higgins Building be marginalized as an aesthetic also ran like Vibiana? When the large parking lot is gone, where will commuters looking to access our burgeoning transit system at the Regional Connectors new station at 2nd and Spring, park their cars?

Historic Districts preserve the architectural and cultural achievements that make great cities so venerable. Across the globe, sensible city planners have saved their "Olde Townes". From

Tokyo and Shanghai to Boston and Philadelphia, historic districts have received their sacrosanct timeless status.

Therefore, I call upon City Planners to save the area Northward from 3rd Street to City Hall, and bordered by Broadway to Los Angeles Streets, creating a Bradbury, Vibiana, St. George Hotel, Higgins Building, City Hall Historic District. Earmark the Joe's Parking Lot by way of eminent domain for a large park with underground parking and you will create a planning triumph that will rival Grand Park. If you have ever stood on the steps of the Philadelphia Museum of Art and looked towards City Hall or trod the Great mall in Washington, you will know the thrill of timeless planning excellence. Los Angeles can achieve the same success.

The purpose of the Historic District is to save existing buildings from destruction through development and to preserve the historic character of the area from any development, high-rise or otherwise, that would be esthetically and culturally deleterious to the unique character of the existing neighborhood.

Let me finish on a personal note for the Higgins Building at 2nd and Main where I reside. For some inexplicable reason the Higgins Building never winds up in the Historic Core where it rightfully belongs. In the proposed City Plan the same error is made. It is historically and architecturally part of the historic core and should belong in it. Therefore, Vibiana, The St. George Hotel, and the Higgins building should be moved to the downtown Traditional Core and not the Transit Core.

Sincerely,
Allan M. Harris
108 West 2nd Street, #1002
Los Angeles, CA 90012
212 966 4035
harrysyounger@aol.com



Cherry Yap <cherry.yap@lacity.org>

Fwd: Comments for record

Brittany Arceneaux <brittany.arceneaux@lacity.org>

Mon, Dec 7, 2020 at 12:02 PM

To: Cherry Yap <cherry.yap@lacity.org>, Jordan Hallman <jordan.hallman@lacity.org>

----- Forwarded message -----

From: **Brittany Arceneaux** <brittany.arceneaux@lacity.org>

Date: Mon, Nov 30, 2020 at 4:16 PM

Subject: Re: Comments for record

To: Susan Hunter <heysuzhunter@gmail.com>

Hi Susan,

Thank you, your comments have been received and filed.

Best,
Brittany

On Mon, Nov 30, 2020 at 3:50 PM Susan Hunter <heysuzhunter@gmail.com> wrote:

Good afternoon,

I wanted to submit the following comments as concern for the proposed Downtown Community Plan.

- 1) The plan fails to acknowledge the population decline in Downtown, compounded with the evacuation of people from the City due to COVID. Census data should be used to confirm the actual population numbers of the community.
- 2) The community wants to preserve RSO housing stock, but the plan is encouraging development and density in the areas that have a large pool of RSO housing stock. This is a conflict.
- 3) The plan fails to call for inclusionary zoning in new developments. We have a legal right to do so under AB 1505.
- 4) The proposed plan doesn't allow for downzoning should the population decline, and fails to look at other alternatives.
- 5) The housing count for the housing built since 2015 isn't correct. The plan fails to account for housing currently under construction. Our housing needs are much less.
- 6) The plan fails to build in for a universal right of return for existing tenants.

Overall, this plan just allows for developer influence and corruption of elected officials, while simultaneously creating a community that bars low-income families and people of color. We will end up with an oversupply of luxury housing stock, which leads to dilapidation. We need a real community plan that is based on real demand and realistic projections of growth. This proposed plan fails to do so. The population projections, real housing needs, and other alternatives are not correct or are missing in this proposed project. It is also intentionally missing diversity, which is the most shameful part and a reflection on a city that criticizes previous racist planning policies such as red lining, but is doing the exact same thing with this proposed plan.

Thank you for your time,
Susan HunterLOS ANGELES
CITY PLANNING**Brittany Arceneaux**

She, Her, Hers

City Planner

Los Angeles City Planning

200 N. Spring St., Room 667

Los Angeles, CA 90012

Planning4LA.org

December 3, 2020

Sent Electronically

Brittany Arceneaux, City Planner
City of Los Angeles Department of City Planning
200 North Spring Street, Room 667
Los Angeles, CA 90012
Email: Brittany.arceneaux@lacity.org

RE: Draft EIR Comments for the Downtown Community Plan Update/New Zoning Code for Downtown Community Plan

Dear Ms. Arceneaux:

On behalf of individual stakeholders and community based organizations that comprise the Chinatown Sustainability Dialogue Group (CSDG), thank you for the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the Downtown Community Plan Update/New Zoning Code for the Downtown Community Plan (DTLA 2040).

CSDG appreciates the City's renewed commitment to developing equitable planning policies and programs in Los Angeles. From this lens, we submit the following comments:

1. Protect Chinatown's historic-cultural neighborhood

- Expand the Villages land use designation. We appreciate that the City expanded the Villages land use designation in Chinatown to include the block between College Street to the north, Alpine Street to the south, North Broadway to the east, and North Spring to the west. We ask the City expand the Villages land use designation in Chinatown to protect our historic-cultural neighborhood and its naturally occurring affordable housing, legacy businesses, and longtime cultural institutions by including: 1) the area south of Ord Street to Cesar E. Chavez Avenue between North Hill Street and North Alameda Street; 2) the west side of North Hill Street between Alpine Street and Cesar E. Chavez Avenue; 3) the area west of North Alameda Street to New High Street between Alpine Street and Cesar E. Chavez Avenue; 4) the north and south side of Alpine Street between Yale Street and North Hill Street; and 5) the block between College Street and Alpine Street to the north and south, and Cleveland Street and Yale Street to the west and east.
- Prioritize spaces for small businesses through commercial establishment size limits in Chinatown.
- Create a new citywide legacy business policy and programs that provide incentives and resources in support of longtime small businesses and institutions.
- Acknowledge and encourage the preservation and rehabilitation of existing historic and potentially eligible resources in Chinatown in the Historic Cultural Neighborhoods Best Practices section on Chinatown.

2. Promote a safer and healthier Chinatown

- Implement neighborhood- and pedestrian-friendly circulation guidelines to reduce air pollution and vehicle-pedestrian accidents.
- Prohibit block alcohol permits which undermine community development goals; rather, each alcohol application should be considered on its own merits, i.e. should be unique to the individual operator or location, and not be awarded as part of an entitlement package that benefits a real estate investor/speculator.
- Limit the hours and frequency of community events in Chinatown consideration of the impact to local residents and businesses; require approval by the neighborhood council.

3. Community benefits should include community-serving amenities

- Public restrooms
- Public parking supply and policy that supports local business and residents.
- Protecting the integrity of parks and open space by maintaining access to light, fresh air, and aesthetic views.

4. Create inclusive housing without displacement of current residents

- Maintain proposed reductions in base FAR and height limits to incentivize affordable housing development in the Chinatown area.
- Increase the supply of affordable housing, including for extremely low AMI renters. Any locally displaced households shall have first priority in new affordable housing.

Thank you for allowing us to share the feedback of longtime Chinatown residents and stakeholders. We look forward to seeing our concerns reflected in updated iterations of the Draft Downtown Los Angeles Community Plan. Please let us know how we can continue to participate in the creation of this important document.

Sincerely,
CSDG TEAM



Homes. Support. Success.

1317 E. 7th Street
Los Angeles, CA 90021
213.683.0522 Tel
213.683.0781 Fax
skidrow.org

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Cox, Castle & Nicholson LLP

Danielle Wildkress
Brilliant Corners

Lee Raagas
Chief Executive Officer

November 11, 2020

Vince Bertoni
Director of Department of City Planning
City of Los Angeles
200 N. Spring Street, Suite 525
Los Angeles, CA 90012

Re: Central City and Central City North Community Plan Update & Environmental Impact Report (“EIR”) Response Letter

Dear Mr. Bertoni,

Thank you for the opportunity to engage in the process and allowing for the mechanism to communicate Skid Row Housing Trust’s (“the Trust”) perspective and position. The Executive Leadership Team and the Board of Directors of the Organization submit this letter in response to the *DRAFT* Central City and Central City North Community Plan and EIR.

Since 1989, the Trust has been committed to solving homelessness and improving the health and safety of all community members in Los Angeles. The Organization has done this by providing permanent supportive housing (“PSH”) along with wrap around services in the County’s most impoverished neighborhood, Skid Row. The Trust builds and operates beautifully designed, high quality housing projects that serve as neighborhood anchors. We offer 1,897 apartment homes to the people who need them most. The Trust is one of the largest property owners and operators of PSH in Los Angeles with 25 of 27 total buildings in our portfolio located in the Industrial District, Arts District, Historic Core, Toy District, Fashion District, and South Park. The Organization has been headquartered in the Industrial District at E. 7th Street and S. Central Avenue for 30 years. We serve the mission to end homelessness and advocate for equitable and inclusive housing for all.

The Trust is grateful for the diligence and work put into the *DRAFT* community plan by LADCP and staff. The Trust also supports the draft community plan but appreciates the opportunity to offer suggestions to make it more consistent with the City's historic and continuing values to achieve equity, diversity, and inclusivity while trying to fill the deep deficit for housing needs while creating economic opportunities to the Community as a whole. Please find the following bullets outlining key perspectives on this important issue:

- Skid Row Housing Trust supports the provisions to require affordable housing as a prerequisite to development incentives to produce much needed affordable housing and distribute them all across DTLA. The opportunity for mixed income, mixed use, and mixed housing should apply to all parts of downtown where housing is allowed.
- Skid Row Housing Trust strongly opposes only allowing 100% affordable housing in Skid Row where we have the highest concentration of poverty. Further concentrating and perpetuating poverty is neither equitable, diverse, nor inclusive. The Organization advocates for a mixed income, mixed use, and mixed housing in Skid Row and oppose this proposed exclusionary zoning policy. We suggest allowing all types of housing in the Industrial District similar to the Industrial-Mixed Hybrid zone proposed in the Fashion District.
- Skid Row Housing Trust supports the inclusion of PSH in the Arts District but opposes the restrictions on other housing types. The current draft only allows live/work units with minimum 1,000 square footage, average size in Type I, II, and IV construction types. On the west side of Alameda in Skid Row, the community plan proposal results in a long term economically poor community. On the east side of Alameda in the Arts District, only large units with more expensive construction types are allowed. This is an exclusionary policy that will inadvertently create an affluent community lacking economic diversity and limits housing appropriate for families, further exacerbating the issues of equity, diversity, and inclusivity against the intended values of the community plan. The Organization suggests allowing all types of housing in the Arts District where housing is allowed similar to the Fashion District.
- Skid Row Housing Trust suggests adding further incentives for developments that can enhance safety and activity on 6th and 7th Street corridors through Skid Row (from Los Angeles Street to the west to Alameda Street to the east). By offering a higher level and larger incentives, these corridors can potentially better connect the Financial District, Historic Core, and the Arts District and are all are critical to contribute to Skid Row's opportunity to be part of the renaissance of DTLA. Incentives that help diversify the land use conversions



along these corridors and bring essential goods and services back into a community that is devoid of diversity, support, and the fundamental building blocks of a complete community.

- Lastly, the Organization suggests LADCP reconsider land uses adjacent to existing and future transit routes on 7th Street and Alameda Street and designate them as Transit Core. These are areas that support and facilitate high public tax dollar investments and should allow for more opportunities for housing production. This area should receive the same consideration as Transit Core with removal of development hurdles such as minimum parking requirements. The Trust is focused on ending homelessness through a multi-pronged approach, the primary being development and building of PSH units. However, the Organization advocates to prevent individuals and families from falling into homelessness in the first place which is possible with more diverse housing options. Los Angeles and Skid Row along with downtown Community members need more housing. The community plan should assimilate all perspectives and integrate many different opportunities for a holistic benefit. There is a significant risk that would be an opportunity lost if this plan does not put more housing near transit.

The Trust is currently developing more than 1,000 new homes and will continue to build thousands more to end homelessness. To make this possible, we need pro-housing policies and rules in place to produce more housing at a lower cost with significantly improved speed to build. California is 49th in housing production per capita. The upcoming *Housing Element* shows for the next eight (8) years, LA calls for more than 460,000 units of new homes to meet the housing needs in City of Los Angeles alone. Central City and Central City North Community Plan update is a prime opportunity to address the housing crisis while simultaneously bringing awareness and solutions to the inequities in housing access and economic opportunities. We applaud the efforts by LADCP and its staff to implement a vision for an equitable, diverse, and inclusive plan for the next 20 years in our DTLA community. There are many positive changes in the current draft community plan but Skid Row Housing Trust believes it can be further improved by exploring and implementing the above suggested recommendations and/or changes. Without these changes, the city will be implementing exclusionary zoning policies Skid Row and Arts District and squandering potential opportunities for more housing near existing and future transit.

We respectfully request that the City more fully evaluate in the EIR the social and economic impacts associated with restrictive zoning that limits market rate and other development in Skid Row and conversely limits the type of housing and restrictions on PSA in the Arts District. The City should consider Project alternatives and additional



mitigation measures that more fully address the adverse environmental, social, and economic impacts of restrictive zoning on housing types in Skid Row and the Arts District.

Thank you for the opportunity to comment on the Draft Central City and Central City North Community Plans and look forward to your responses.

Sincerely,



Simon Ha, AIA
Chairman of the Board of Directors
Skid Row Housing Trust

cc:

Kevin De León, LA City Council District 14
Samantha Millman, LA City Planning Commission
Craig Weber, LADCP
Brittany Arceneaux, LADCP
Valerie Watson, LADCP
Lee Raagas, Skid Row Housing Trust
Sierra Atilano, Skid Row Housing Trust
Antonio Le Mons, Skid Row Housing Trust



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12.02.20

Vince Bertoni, Director
City of Los Angeles Department of City Planning
200 N Spring Street
Los Angeles, CA 90012

Subject: DTLA 2040

Dear Mr. Bertoni,

We are a Los Angeles Architecture firm dedicated to the revitalization of DTLA through the reuse of existing and historic buildings. We have touched over 400 existing buildings in and around DTLA in the last 10 years. We've witnessed the strength of City directives to help transform our city and have been highly involved in policy reform such as the Bringing Back Broadway Initiative, LADBS's Broadway Historic Commercial Reuse Bulletin, Non-ductile Concrete ordinance, and our Founder, Karin Liljegren, was involved in the 1999 Adaptive Reuse Ordinance.

We are excited by the prospect of the DTLA 2040 document to again bring positive change. We have been analyzing and following revisions in the general DTLA 2040 plan for the past few years. In particular, we focused on Adaptive Reuse under Article 9, working with LACP for the past few months. We compared the new Adaptive Reuse incentives in the DTLA 2040 plan with the current Adaptive Reuse Ordinance and applied the new incentives to 8 case study buildings. LACP has been highly engaged in answering our questions and clarifying the language, and we are very appreciative of their time and efforts.

Below we identified our comments for both Article 9 as it pertains to Adaptive Reuse, and the general plan as a whole. While this document is highly transformative, we do not feel that it goes far enough. The cost of renovating and retrofitting old buildings has doubled in the last 20 years due to new codes, strict interpretations of existing codes and general construction cost escalations. Despite the increased challenges, we believe that retaining and reusing existing buildings is the key to carbon reduction in our city, and will play a critical part in the Mayor's 'Decade of Action' plan. These buildings need all the help that they can get to offset the high costs and ensure they remain. Incentives such as free floor area are a perfect solution. In light of what we have all learned from our current health crisis, social injustice crisis and climate crisis, we need as much flexibility and adaptability in our codes as possible.

Article 9 - Adaptive Reuse

1. We recommend LACP distinguish between historic and non-historic adaptive reuse projects through additional incentives applied to historic projects. Currently, the 2040 plan only provides additional incentives for historic projects as part of a unified adaptive reuse project, or through TDR which applies to a small portion of the Arts District. This is very limiting as the

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majority of historic projects downtown are in dense areas with no empty development areas nearby that could be combined to constitute a unified project. This incentive structure promotes larger scale development but does not provide incentives specific to single historic properties which often face much more difficult, costly and lengthy retrofits than non-historic/newer properties.

2. The 2040 plan maintains the original Adaptive Reuse Ordinance floor area exemption incentive for residential use, which allows for new mezzanines to be added within an existing building's envelope. There are many places within existing buildings that can accommodate new floor area. This added area can create more revenue and offset the high cost of renovating and retrofitting these buildings. We recommend Historic Buildings with any use be allowed to have new intermediate floors and mezzanines that do not count towards floor area.
3. Residential and lot amenity space requirements for unified adaptive reuse projects are currently based on the residential floor area for the full site. We recommend that the required amenity space should be based on the new development floor area only.
4. We recommend an update to the 1999 Adaptive Reuse Ordinance through a targeted code amendment in order to adopt the adaptive reuse incentives from the DTLA 2040 plan before the creation and implementation of the full community plan. Otherwise, we anticipate citywide adaptive reuse projects will stall until the community plan is enacted.
5. We recommend removing the requirements to maintain loading dock areas. With change of use projects in industrial areas, loading docks may not be needed and have the potential to drastically limit the opportunities for unified adaptive reuse projects.
6. From our conversation with the Office of Historic Resources, we understood the adaptive reuse qualification date of 1974 was chosen based on 25 years prior to the adoption of the Adaptive Reuse Ordinance. The 1974 date is not applicable to the 2040 community plan and we recommend removing this date. We believe that there should be a 10 year rolling clock to be able to access adaptive reuse incentives.

General DTLA 2040 Plan

7. The historic core FAR requirements do not align with the existing context. Most existing buildings within the historic core are 12 stories in height and are often built to the property line. A Base FAR of 12:1 would be more in-line with existing conditions and will promote a more consistent street frontage. *(Example from DTLA 2040 Draft: Broadway (4th to 7th), Spring St and Main St, Base FAR - 6:1 and Bonus FAR - 8.5:1)*
8. The historic core articulation requirements of base-middle-top and banding requirements will likely result in an Architectural expression defined by mimicry and lacking the sophistication

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capable of modern building technology. We suggest the DTLA plan use restrictions in the form of height and massing to ensure congruity while still allowing for articulation and fenestration honest to our time. Furthermore, the relatively limited base FAR of 6.0 (as compared to the prevalent 12 story character of the area), combined with base-middle-top requirements, will likely result in proportionally awkward buildings that don't properly relate to their context.

9. The DTLA 2040 plan appears to be silent with respect to highway dedications. We suggest DTLA 2040 adopt a policy in line with the CASP to ensure setback consistency goals are not undermined by current archaic highway dedication requirements.
10. The Downtown Plan includes a requirement for two bedroom units in [specific] areas. Projects located within the Subarea A.4 are required to provide a minimum of 30% of all dwelling units as two bedrooms or larger. This requirement is overly prescriptive and may not be viable at all locations.
11. Sustainability features should be considered a community benefit and incorporated into the tiered incentive structure. By making FAR and height bonuses available to buildings with sustainability features above those required by code, the city can incentivize and promote a move towards the Mayor's Green New Deal.

We commend the efforts of Planning staff and look forward to a fruitful collaboration.

Sincerely,



Karin Liljegren, FAIA,
Omgivning Architecture and Interiors
Principal and Founder



Industrial District Green

A Project of Community Partners

Los Angeles City Planning Department
201 N Figueroa St Ste 4
Los Angeles, CA 90012

RE: DTLA 2040 Community Plan Update

December 3, 2020

Dear Downtown Community Planning Team:

In 2012 several residents, including myself, came together to address the severe lack of tree canopy in the industrial neighborhoods of Downtown Los Angeles. We founded Industrial District Green with the mission:

to improve the livability of the DTLA Industrial District through the implementation and maintenance of community-based greening and open space projects while engaging under-served members of the community via education and outreach programs.

Since our founding, Downtown has seen an explosion of development. With the vast amount of money flowing into our area for high end housing we would have expected to see a commensurate number of trees and parks to offset the influx of people. Unfortunately, this was not the case. Despite the years of advocacy aimed at City Planning personnel we were never able to stop tree variances from being issued which caused Downtown to lose out on hundreds of thousands of dollars “worth” of tree canopy. Once a tree variance is issued, and they are granted all the time for Downtown projects, we never end up seeing those trees – the fees end up going into a black hole and no one is quite sure who decides how they can be used – including City Planning personnel. We are the only tree-planting organization native to Downtown Los Angeles, so if we do not know how these funds get accessed locally, then it is safe to say it cannot be known. Further, the fact that trees “in containers” can count as trees planted for a project, ignores larger stormwater management concerns for the LA River Watershed upon which Downtown sits. All trees required to be planted should be mandated to be planted in the ground.

Mayor Garcetti announced a new partnership with Google called “[The Tree Canopy Lab](#)”. A cursory look at Downtown with this tool shows that our industrial neighborhoods average around 3 ½% canopy coverage. A healthy % would be closer to 15% ([Why We No Longer Recommend a 40 Percent Urban Tree Canopy Goal - American Forests](#)). Compounding these already unhealthy conditions are the large amounts of emissions pumped into the area from semi-trucks that travel through this zone, which exacerbate an already vulnerable population. Additionally, large warehouses amplify the urban heat island effect, making hot days even more unbearable. The negative effects of not having tree-lined streets are immediate and unavoidable, especially for the homeless who struggle to find relief from the sun’s rays during LA’s sweltering summers. Residents of the neighborhood - both homeless and housed, have been almost completely disconnected from nature.

Since the last decade of intense development Downtown has led to an uneven distribution of public benefits, with over half of Downtown seeing no new park space added, there is nothing that tells me that the next decade will be any different, despite anything included in the DTLA 2040 Community Plan Update. There are no mandates for park space/per new unit built. No mandates for WHERE any new parks would be built, and no guarantee tree variances would not continue to be issued. It is not like Downtown does not desperately need the trees. Where does City Planning think the funding for an urban forest is supposed to come from if tree variances keep getting passed out like candy?

Our ask is that you mandate trees as well as park and greenspace square footage/per new unit built from development projects and that you bake in accessibility for all corners of Downtown. Someone that lives near the intersection of the LA River and 10 freeway should not have to travel two miles away to access a park.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink that reads "Katherine D. Munnery". The signature is fluid and cursive, with the first name being the most prominent.

Co-founder of Industrial District Green

cc: Craig Weber, craig.weber@lacity.org
Brittany Arceneaux, brittany.arceneaux@lacity.org
Jordan Hallman, jordan.hallman@lacity.org
Valerie Watson, valerie.watson@lacity.org
Veena Snehansh, veena.snehansh@lacity.org

Industrial District Green Tel: (213) 293-1425 Email: info@industrialdistrictgreen.org Web: www.industrialdistrictgreen.org



Cherry Yap <cherry.yap@lacity.org>

Fwd: DTLA 2040 Community Plan Draft

Brittany Arceneaux <brittany.arceneaux@lacity.org>
To: Cherry Yap <cherry.yap@lacity.org>, Jordan Hallman <jordan.hallman@lacity.org>

Wed, Dec 9, 2020 at 10:23 AM

----- Forwarded message -----

From: **Brittany Arceneaux** <brittany.arceneaux@lacity.org>
Date: Mon, Dec 7, 2020 at 11:31 AM
Subject: Re: DTLA 2040 Community Plan Draft
To: Yukio & Lilian Kawaratani <yklk31@gmail.com>
Cc: Grant Sunoo <gsunoo@ltsc.org>, Kristin Fukushima <kristin@littletokyo.org>, Doug Aihara <douga@aihara-associates.com>, Ellen Endo <ellenendo@yahoo.com>

Hi Yukio,

Thank you, your comments have been received and filed.

Best,
Brittany

On Sat, Dec 5, 2020 at 11:05 PM Yukio & Lilian Kawaratani <yklk31@gmail.com> wrote:

Brittany,

Thank you for explaining the DTLA 20/40 Community Plan proposed densities for the Little Tokyo area. Do I have this correct?

Wow, the Little Tokyo and adjacent areas are all proposed to have a permitted by-right, zoning base Floor Area Ratio (FAR) of 2:1 FAR. This is a considerable downzoning, as the existing zoning for the area permits a 6:1 FAR, with no height limit. In the Village areas of Little Tokyo, the by-right height is 3 stories. If a project includes community benefits (like affordable housing), it can reach a bonus FAR maximum height of 5 stories and 6:1 FAR. In the proposed Community Center areas of Little Tokyo, if a project includes community benefits, it can reach a bonus maximum of 8.5:1 FAR.

A few notes for your information and consideration:

- o The 8.5 FAR bonus maximum seems excessive. A 6:1 FAR is recommended.
- o The Sustainable Little Tokyo and First Street North Plans have advocated to expand development of the community to Temple Street.
- o The Little Tokyo Service Center and Go For Broke Foundation are developing a five story high, affordable housing for veterans, on the triangular site, less the City parking structure, north of Jackson Street.
- o The Village area might be expanded to Temple Street. As a minimum, it should be expanded to include the Union Center for Arts site on Judge Aiso Street.

FYI, attached is a multicolored land use and building map of Little Tokyo that I prepared 2 1/2 years ago.

I support the DTLA 20/40 Community Plan proposed densities for the Little Tokyo area, as they will help maintain the character and scale of Little Tokyo.

I will email you my comments on the DTLA Community Plan proposed Village/Little Tokyo policies soon.

Yukio

On Mon, Nov 30, 2020 at 8:45 AM Brittany Arceneaux <brittany.arceneaux@lacity.org> wrote:

Hi Yukio,

Thank you for reaching out! The draft floor area is regulated by the zoning code - the official document that will be adopted and enforced. The FAR maps are informational outreach tools we use to help make the zoning recommendations easier to understand.

I've included a screenshot of the November 2020 Draft zoning map. The areas in the light pink have a draft zone of [MN1-SH1-5] [CX1-FA] [-CPIO- -]. The "MN1" regulates the FAR and Height on these properties. I've included the draft zoning code page for MN1. As you can see in the pdf, the by-right FAR is 2:1 and the by-right height is 3 stories. If a project includes community benefits it can reach a maximum height of 5 stories/6:1 FAR. The draft story limitations will prevail over the FAR allowances.

The darker pink areas in the map have a few different zones including [DM2-SH2-5] [CX1-FA] [-CPIO-O-CDO] and [DM2-G1-5] [CX2-FA] [-CPIO-O-]. The "DM2" regulates the FAR and Height on these properties. I've included the draft zoning code page for DM2 as well. As you can see in the pdf the by-right FAR is 2:1. If a project includes community benefits it can reach a maximum FAR of 8.5:1 FAR.

As you mentioned, the current zoning in Little Tokyo allows a 6:1 FAR with no height limit and no requirement for community benefits such as affordable housing. The DTLA 2040 November draft proposes a reduction from what can currently be built by-right. This adjustment was made in response to stakeholder's requesting that the plan create more opportunities for community benefits such as Affordable Housing.

Please let me know if you have any additional questions.

Best,
Brittany



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On Wed, Nov 25, 2020 at 3:25 PM Yukio & Lilian Kawaratani <yklk31@gmail.com> wrote:

Brittany,

Under the previous Little Tokyo Redevelopment Plan, zoning density permitted was a 3:1 FAR and nearly all the apartment developments that were constructed were at a 7 story height. Present zoning in Little Tokyo permits a 6:1 FAR, resulting in the out of scale 11 story apartment building under construction on Onizuka Street.

The Community Plan also grants a bonus to 8.5:1 FAR for apartment developments that have some affordable housing. The two densities permitted would encourage the demolition of existing buildings in Little Tokyo and result in tall, out of scale, and expensive apartment buildings. Gentrification consequences will expand and hurt the community.

To help protect existing Little Tokyo buildings, the plan previously proposed a 5 story height limit in the Village areas. Where is this still in the plan and is it legally enforceable if the zoning remains at 6:1 FAR?

The Community Plan density maps are confusing. It seems to show a 2:1 Base FAR Max. in the Little Tokyo Village areas and 6:1 FAR in the Little Tokyo Community Center areas. The Bonus FAR Max. in the Little Tokyo Village areas is 6:1 FAR and in the Community Center areas it is 8.5:1 FAR.

There is an asterisk on the maps that FARs on the map are for reference only.

So, what are the Community Plan proposed FAR density for the Little Tokyo Village and the Community Center areas? Or, will the zoning density of 6:1 FAR prevail?

Please clarify these questions for me. It would be greatly appreciated.

Yukio Kawaratani

--



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CITY PLANNING

Brittany Arceneaux

She, Her, Hers

City Planner

Los Angeles City Planning

200 N. Spring St., Room 667

Los Angeles, CA 90012

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E-NEWS

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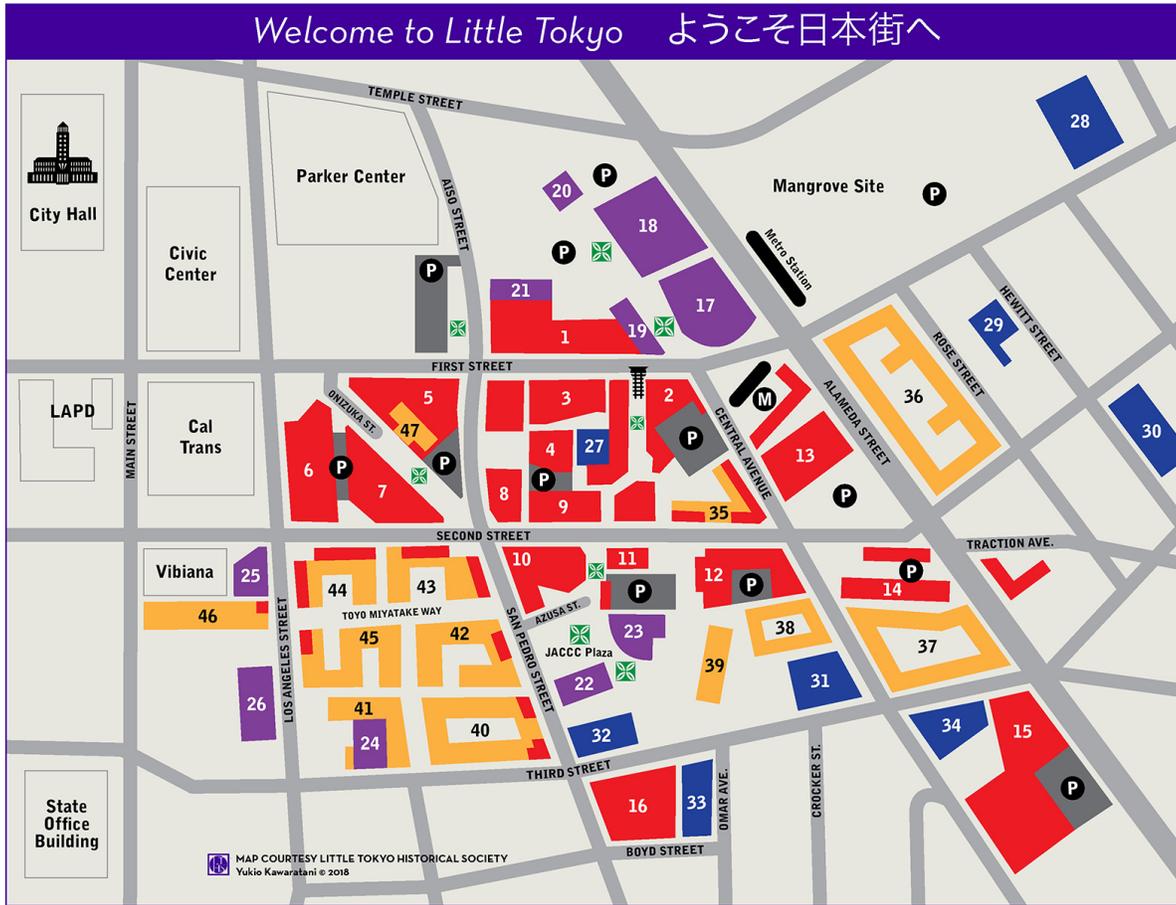
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OFFICES - SHOPS - RESTAURANTS

- 1 Little Tokyo Historic District
• Koban and Visitor's Center
- 2 Japanese Village Plaza
- 3 Miyako Hotel
- 4 Little Tokyo Mall
• Anime Jungle
- 5 Kajima Building
- 6 Double Tree Hotel
- 7 Weller Court Shopping Center
- 8 Union Bank Building
- 9 Federal Public Defender
- 10 Manufacturers Bank
- 11 Little Tokyo Plaza
- 12 Brunswick Square
- 13 Office Depot
- 14 Honda Plaza Shopping Center
- 15 Little Tokyo Marketplace
- 16 Little Tokyo Professional Bldg.

CIVIC - CULTURAL

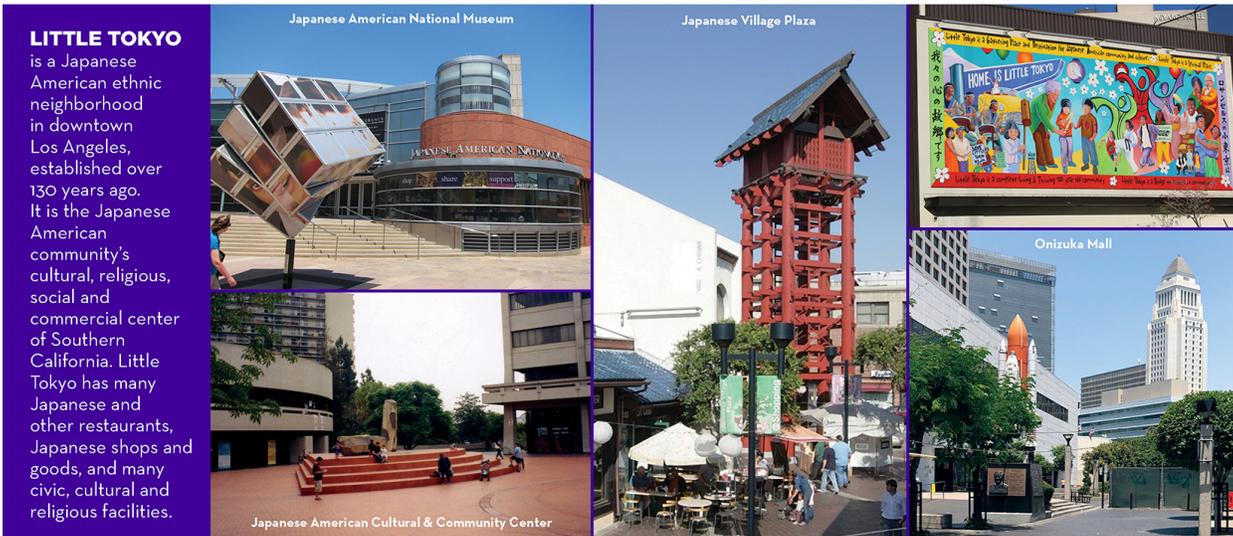
- 17 Japanese American National Museum
- 18 Geffen Contemporary at MOCA
- 19 Go for Broke National Educational Center
• National Center for the Preservation of Democracy
- 20 Go for Broke Monument
- 21 Union Center for the Arts
• East/West Players
- 22 Japanese American Cultural & Community Center
- 23 Aratani Theatre
- 24 Little Tokyo Service Center
- 25 Little Tokyo Branch Library
- 26 Paul I. Terasaki Budokan

RELIGIOUS INSTITUTIONS

- 27 Koyasan Buddhist Temple
 - 28 Nishi Hongwanji Buddhist Temple
 - 29 Zenshuji Soto Mission
 - 30 St. Francis Xavier Japanese Catholic Church
 - 31 Higashi Honganji Buddhist Temple
 - 32 Union Church of Los Angeles
 - 33 Jodoshu Buddhist Temple
 - 34 Centenary United Methodist Church
- Other
- M Little Tokyo/Arts District Regional Connector Station
 - P Parking
 - Landscaped Plazas

HOUSING

- 35 Hikari
- 36 Savoy
- 37 Tokyo Villa
- 38 Miyako Gardens
- 39 Little Tokyo Towers
- 40 Teramachi
- 41 Casa Heiwa
- 42 Sakura Crossing
- 43 Wakaba LA
- 44 AVA Little Tokyo
- 45 AVA Little Tokyo
- 46 STOA
- 47 Lotus 77



LITTLE TOKYO is a Japanese American ethnic neighborhood in downtown Los Angeles, established over 130 years ago. It is the Japanese American community's cultural, religious, social and commercial center of Southern California. Little Tokyo has many Japanese and other restaurants, Japanese shops and goods, and many civic, cultural and religious facilities.

Japanese American National Museum

Japanese Village Plaza

Onizuka Mall

Japanese American Cultural & Community Center

DTLA 2040 COMMUNITY PLAN -- LITTLE TOKYO POLICIES YK 12/6/20

PROPOSED TEXT By City Planning with YK modifications underlined:

LU GOAL 42 VILLAGES - NEIGHBORHOOD POLICIES

Little Tokyo

Little Tokyo is a historic-cultural neighborhood and symbolic center for the Japanese-American community. The neighborhood contains a variety of religious and cultural institutions and a mix of residential, commercial and institutional uses. Small retail shops, restaurants and store fronts contribute to the pedestrian-oriented nature of the area.

LU 42.6 Monitor and strengthen the pedestrian elements in Little Tokyo by preserving existing street frontages and internal pathways, enabling commercial uses on the ground plane of all buildings, and supporting the orientation of mid-block paseos.

LU 42.7 Retain, support and reinforce the historic and cultural elements of Little Tokyo, including the businesses and cultural and religious institutions within the community.

LU 42.8 Complete, support and reinforce the Little Tokyo midblock Pedestrian Spine system to enhance connectivity in Little Tokyo. (including the Onizuka Mall and a westerly extension to the city building pedestrianway.)

LU 42.9 Support the advancement and expansion of performance and creative arts, including and in addition to the Union Center for the Arts (East/West Players), Japanese American Community & Cultural Center (Aratani Theater), and Japanese American National Museum (Takeuchi Democracy Forum).

LU 42. Provide measures to mitigate gentrification caused high property values and expensive rents created by the regional connector station, that are threatening small businesses and the statinability of Little Tokyo as a viable cultural and ethic community.

LU 42. Discourage acquisition and demolition of properties with existing small businesses to construct high density developments.

(B) Add new Policies and Programs to prioritize small businesses, affordable housing, displacement avoidance, inclusive economic development, mobility and support cultural and religious institutions in Village Communities.

Please respond regarding all my above suggestions for possible inclusion in the DTLA 2040 Community Plan.

Yukio Kawaratani yklk31@gmail.com

12/7/20

Los Angeles City Planning Department

Attn: Brittany Arceneaux, City Planner, brittany.arceneaux@lacity.org

RE: Remarks to the Draft of the Downtown Community Plan Update via email

Dear Brittany,

As an Architect practicing in Los Angeles for 30 years, I have a few thoughts about the current drafts of the Downtown Community Plan Update and the recommendations for Recode LA 2040. The website states:

“Several years ago, City Planning set out to create a modern and efficient zoning system for Los Angeles. The proposed approach aims to establish a new Zoning Code that is more responsive to the needs of Los Angeles’s neighborhoods, in addition to being easier to use.”

Good goals, but the current drafts do not yet appear more responsive to local needs or streamlined enough to facilitate the goals. Broader evaluation, recharacterization and refinement can hopefully still occur.

The draft encourages specific distinction between neighborhoods and their current or perceived cultural affiliations. This distinction freezes a location in time and prohibits future evolution. This will result in the perpetuation of a fake architectural representation to gain city approval. Overly specific development standards create confusion and contradiction leading to increased reliance on interpretation from governing bodies. This will slow decisions and make approval times longer. For example, the draft prohibits balconies and non-flat rooflines in the Arts District because they’re deemed not reflective of the area. This is simplistic and out of step with current building stock. Balconies are a common residential element and meet market demand. Prescribing rooflines creates arbitrary limits on architectural expression. The “roofline” or “facade articulation” language is something I find throughout planning codes. The SNAP plan contains such language and I’ve seen hundreds of hours of consultant, Architect, and City staff time spent figuring out what can be done per the “language.” The level of interpretation and enforcement has varied over the years and continues to plague projects while not producing better results.

The current drafts for use and density are too specific and possibly costly. The Hybrid Industrial District has too many development standards that will cap interest in housing development because of the minimum unit size, material, and form requirements. The draft recommends uses for the interior of the building. These should all be reviewed and crafted to permit flexibility and change over time.

I believe the current draft needs further study and input from the design and development community prior to adoption. The draft analysis of the Downtown, Arts District, Little Tokyo, and Chinatown districts need to be reconsidered and not defined by transitory cultural associations, a form-based code, or by prescribed use requirements that will not evolve over time to reflect the community it serves. Los Angeles deserves a code that is appropriate and flexible while allowing for innovation and the economic realities needed for growth.

Sincerely,



Brian Lane, AIA, Principal, LEED AP

cc: Craig Weber craig.weber@lacity.org

Shana Michele Murphy Bonstin shana.bonstin@lacity.com

Will Wright will@aialosangeles.org



Cherry Yap <cherry.yap@lacity.org>

Fwd: DEIR Comments for DTLA Community Plan

Brittany Arceneaux <brittany.arceneaux@lacity.org>

Tue, Dec 8, 2020 at 10:25 AM

To: Jordan Hallman <jordan.hallman@lacity.org>, Cherry Yap <cherry.yap@lacity.org>

----- Forwarded message -----

From: **Brittany Arceneaux** <brittany.arceneaux@lacity.org>

Date: Mon, Dec 7, 2020 at 11:14 AM

Subject: Re: DEIR Comments for DTLA Community Plan

To: Laura Velkei <lvelkei@gmail.com>

Hi Laura,

Thank you, your comments have been received and filed.

Best,
Brittany

On Fri, Dec 4, 2020 at 4:46 PM Laura Velkei <lvelkei@gmail.com> wrote:

Hi Brittany -

You'll be receiving other correspondence from the team if you haven't already but we wanted to include the work we did on the matter that garnered hundreds of signatures supporting the Arts District Ordinance which we submitted to City Planning. Highlights of the ordinance included:

- Minimum average size unit size of 1000 square ft (this is adjusted from 750 minimum)
- 1.5 FAR Commercial Space
- Post & Beam Construction
- Type one and Two Construction
- Historic & Contributing Buildings

In 2015, the Arts District Community submitted a [land-use ordinance](#) to the City of Los Angeles reflecting the desires of the community and to ensure the long term health and sustainability of the Arts District.

The [plan](#) was presented to the city as an alternative to the Hybrid Industrial Ordinance as it was more reflective of the community goals vs outside developer goals promoted by the now-indicted former council member Huizar.

Over 325 people signed the [petition](#) supporting the Arts District drafted plan. So as not to clutter up your inbox, the Ordinance submitted to the City and was offered to stakeholders in petition form again can be found [here](#). A pdf version is also attached. (Timestamps and emails can be provided if needed)

In addition, all 3 of the Community Boards in the Arts District drafted and [submitted letters](#) as to their position on the matter.

We respectfully request that this petition and the linked letters previously submitted be included in the record and that the will of our community be enforced over the outside interests of other stakeholders not living or working in the community.

Please let me know if you need me to send the pdf of the org letters in addition to the links, we just wanted to have this on file before 5.

Have a great weekend!

Laura

--

Laura Velkei
educate. unify. activate.
(213) 373-1038
lvelkei@gmail.com

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Our Letter & Signers

*An Open Letter from Urban and Civic Leaders to the Los Angeles City Council and Department of City Planning: The undersigned are a group of community members and leaders, architects, urban planners, developers, and academics who deeply care about the future of the Arts District in Downtown Los Angeles. The Arts District is a unique and irreplaceable part of Downtown Los Angeles and we hope the City Council adopts a specific plan that will preserve the defining characteristics of our neighborhood — a plan designed to build on the innovation, creativity, and economic activity developed over the last three decades. The Arts District is a prime example of how proper planning and zoning can transform a blighted urban center. The Artist-in-Residence Ordinances have empowered artists and entrepreneurs to re-imagine and re-purpose an area that had been severely underutilized. **If the Arts District is to maintain its unique place as a vibrant center of creativity, economic prosperity, and diversity, a forward thinking land use policy should be adopted; a policy that will safeguard and promote these values.** Rigid building codes and out-of-date urban planning practices should be set aside while a thoughtful evaluation of new tools is being conducted. The attached proposal for an Interim Land Use Policy framework in the Arts District was created with the goal of maintaining and strengthening the extraordinary diversity which has been a defining hallmark of the Arts District. It ensures that new projects will maintain a balance of creative space and live/work space. The proposal seeks to ensure that the creation of any new live/work spaces maintains the distinctive live/work environment characteristic of the Arts District — and does not promote the suburbanization of this vital urban center. Los Angeles has many multi-family residential neighborhoods, like West LA, but it has only ONE Arts District in Downtown Los Angeles. It is critical that the new area plan be designed to build on rather than undermine the defining characteristics of the Arts District. Specifically, we advocate that Type I and II buildings must be the primary method of construction and an appropriate density should be afforded to offset the cost of construction. Wood structures should be constructed in a way that will maximize the flexibility and adaptability of design and must maintain commercial capabilities. Live/work units should be designed with true live/work utilization in mind. Live/work should provide the flexibility and structural integrity that promotes multiple uses. Live/work should not be diluted into a veiled excuse for turning the Arts District into a bedroom community. Ground floor space should be dedicated to traditional uses that enhance the pedestrian experience. It is wholly inconsistent with the characteristics of the District to undermine the pedestrian experience by allowing ground level parking. New construction in the Arts District should provide parking below or above street level. We feel strongly that the Department of City Planning should craft a land use policy based on the long-term best interest of Los Angeles and the community as a whole, a policy that is uniform and evenly applied, a policy that protects the defining characteristics of the District, and a policy that is not subject to endless variances granted to satisfy the needs of specific developers. We encourage you to use the attached draft ordinance as the building block for creating a meaningful land use policy for the Arts District. Respectfully, Here you will find the people behind the design of this ordinance and the people who support it. We would like to add your name too. You can lend your voice [here](#).*

I support the Community written Arts District Ordinance (Responses) : Supporters

Name
SANAZ ABDI
Ellen Abramson
Gina Acuña
PRICE AGAH
Alexandra Agajanian
BRANDON ALULEMA
ODGEREL AMINA
AUSTIN ANDERSON
HELEN ANDERSON
RAUL ANGELES
Aires Arch
JOSE ARLLANO
ANA AYON
Jane Baek
Michael Baquiran
Mohammed Barakat
Yuval Bar-Zemer
ELIAS BARRY
MICHAEL BAUM

MICHAEL BAUM
BEGUM BAYSUN
matthew beehler
KAZAR BEILEVIAN
VALERIE BENAVIDES
Bevan Bennett
Denton Biety
Robin Blanchard
Aaron Bonner
Blair Borden
Mark Borman
Qathryn Brehm
TONY BRUNO
STEVEN BRYANT
KRYSTA BRYER
IAN BUCHHOLZ
AMY BURDO
CRAIG BURLINGAME
Diego Cano-Lasso
GERARDO CANTOZ
KATIE CARNES
MARY CARTER
Sylvia Castano
ALEX CASTINEDA
JOSHUA CASTRO
David Cerwonka
STAN CHA
REBECCA CHAN
SARAH CHANG
Yu Young Chang
Joel Chandler
HALSEY CHAPLIN
MIKE CHAVEZ
ALLIE CHAVEZ
JAMES CHEEKS
I-LI CHEN
SAM CHIPLIN
STEVEN CHOI
Kevork Cholakian
MILES CILETTI
CAMERON CLOSE
ALYN CLOUD
Dawn Cody
John Colao
MIKE COMPIE
Avianna Compoc
Marten Compoc
CHRISTINE CONSTABLE
Stephen Corwin
SARAH CROAK
HARLEY CROSS
JOSEPH CRUZ
ADDET DAIRABAYON
JUSTIN DAVIS
FREDDY DEGADO
Beatrice De Jong
LUIS DELOSANTOS
Matt Devitt
Jamie DeVore
Fernando Diaz
J. DITON
TRI DO
DIEGO DOMINGUEZ
DOUGLAS DUNNAM
MIKE DUONG
Miller Duvall
TERRY ELLSWORTH
Marie P Elter
SETH EUBANKS
Scot Ezzell
ALVARO FERREIRA
LUCIA FEUREUR
CHRISTINA FISHER
Derrick Flynn
Ron Fong
KELLEY FRANCIS
JEFFREY FROEHLICH
Christopher Fudurich
DABY GALLARDO
Mark Gallo
VICTORIA GAMBURG
EM GARDL

AMBER GELLIN
Michelle Gertzman
NELSON GIBBS
A. GILBERT
Ed Glendinning
Sarah Gochrach
DANIELLA GOLDFRAD
ANTHONY GONZALEZ
ANDRIA GONZALEZ

KATIE GRANIN
LINDA GRAY
Tracy Green
Rinat Greenberg
Anthony Mark Hankins
ULYSES HARDY
BECKY HARTING
MATT HECKLAN
Mickey Hedges
Matthew Heffner
AUDREY HENDERSON
KRISTIE HERNANDEZ
LUZ HERNANDEZ
Liz Hesik
Lindsay Hollister
Todd Hughes
SAM HUNT
Susan Hutchinson
NICOLE IRALDO
TARA JANE
KRISTINE JAROB
JOHN JASON
Robert Jefferson
Jonathan Jerald
THED JEWEL
catherine jimenez
DAN KARVOUNIS
Andrew Kasdin
JOSH KAYE
TIM KEATING
Amanda Keiden
WILLIAM KEIHN
Jennifer Kerner
Arsen Khachatryan
RALEIGH KNIGHT
HEATHER KONAINA
Trisha Kooba
MEKAIL KREUSS
Alana Krigger
Marin Kunert
Lili Lakich
LEO LAMPRIDES
BONIE LASTRA
BRIAN LAZARO
RODNEY LEE
MINAH LEE
MICHELLE LEE
CATHERINE LEE
Christina Lee
Jessie Lemos
Drew Lesso
HELEN LI
Ray Lin
Scott Liken
DIANA LOPEZ
EDITH LOPEZ
ILIA LOPEZ
Lucas Magasweran
CHARLIE MAGOVEM
James Mansfield
Michael Manzoori
Y. MARTINEZ
ALLISON MARTINEZ
JO MASKIN
JOSHUA MATTHEIS
Jim McBride
Brendan McCarthy
WALT McCLEMENTS
Morgan McLachlan
Katherine McNenny
Lauren McQuade
Jasser Membreno

JULIE MENDEZ
MAT MICKEL
TIGER MOON
BRITNEY MOORE
NIC MOORE
ADRIAN MORA
RAY MORENO
KERA MORGAN
Delmore Morsette
Lilli Muller
WENDY NAVE
A. NEWSOME
RAYMOND NEWTON
LINDA NGUYEN
Thomas Nagano
Adam Normandin
Deena Novak
Elle Nucci
Paul Oberman
MATTHEW ODEN
LAURA ORELLANA
JOSE OROZCO
LISA PALERMO
KEVIN PAPYA
BEN PASQUALE
DANIELLE PHILLIPS
Anna Marie Piersimoni
JANICE PLANK
Lorena Porras
MATT PUGH
DANNU QUESADO
Tim Quinn
BENNY QUINONEZ
Penny Raile
ISHMAEL RANIM
MARK REDHEAD
Natalie Reynoso
RIANA RHOADES
MELISSA RICHARDSON
GRAHAM RILEY
EDDIE RILEY
LILLIAN RIVARD
CHRISTIAN ROBINSON
SONIA ROBINSON
ALEX RODRIGUEZ
MELANIE RODRIGUEZ
ANTONIO RODRIGUEZ
ALEX ROSE
LORI ROSEN
ROCCO ROSSI
ELIZABETH RUBIN
THERESA SABO
CHRISTOPHER SACHS
S. SAGE
KARIN SALEH
SHAUN SAMPSON
SHERILLE SAMSON
JAMES SANDER
MARK SANDERS
Heath Satow
Jonathan Schiminske
Susanna Schulten
Cindy Schwarzstein
James Scott
RODLIN SCOTT
Robert Scott
BEN SEARLE
jt sebastian
KIM SECOQUIAN
SARAH SELTZER
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TABITHA TORREA
NATALIA TORRES
Randy Torres
Jesta Trujillo
Tracy Tynan
Vivian Um
SAM VAN DER WOLT
Patricia van Hasselt
MAURICIO VAN HASSETT
NICK VANDFIELD
Rush Varela
CHRISTINE VARNEY
Sarkis Vartanian
Laura Velkei
JACOB VIDANA
JAKE VIRAMONTEZ
MICHAEL WAKABAYASHI
Ann Wallace
Ethan Walter
STEVE WARD
Bethany Ward-Lawe
Jean-Marc Weber
Dan West
STEPHANIE WHEELER
Peter Wibisono
Justin Wilcott
Grant Williams
RAMONE WILLIAMS
DAVID WILLIAMS
LEILANI WILSON
STACI WOO
Lauren Woodward
MICHAEL WOOLSTON
RYAN YANG
ARTHUR YEUNG
Jin Yoo
Dale Youngman
Oscar Zaldana
RICHARD ZIPLER
Christopher Zwimer

Supporters

>
<

[ADD YOUR NAME](#)





Cherry Yap <cherry.yap@lacity.org>

Fwd: DTLA 2040

Brittany Arceneaux <brittany.arceneaux@lacity.org>
To: Cherry Yap <cherry.yap@lacity.org>, Jordan Hallman <jordan.hallman@lacity.org>

Mon, Dec 7, 2020 at 12:18 PM

----- Forwarded message -----

From: **Brittany Arceneaux** <brittany.arceneaux@lacity.org>
Date: Fri, Dec 4, 2020 at 11:11 AM
Subject: Re: DTLA 2040
To: Jason Lee <jsl394@gmail.com>

Hi Jason,

Thank you, your comments have been received and filed.

Best,
BrittanyVirus-free. www.avg.com

On Thu, Dec 3, 2020 at 3:50 PM Jason Lee <jsl394@gmail.com> wrote:

Hello,

I am writing to ask the affordable housing only (iX1) zone for extremely low and poverty income level residents be expanded to the boundaries of the existing Skid Row neighborhood (from 3rd to 7th streets between Main and Alameda).

Furthermore the draft's focus on housing opportunities must be expanded to include extremely low and deeply low-income households. As HUD/HCD continues to adjust low and 'very low' income thresholds at a rate that exceeds that of actual media income growth, the gap between our so called affordable housing and market levels continues to close, and these units become less affordable to the extremely low and deeply low-income households that they are supposedly intended for. In order to address our affordable housing crisis we must include extremely low and deeply low income households in any affordable housing planning.

Sincerely,
Jason LeeLOS ANGELES
CITY PLANNING

Brittany Arceneaux
She, Her, Hers
City Planner
Los Angeles City Planning
200 N. Spring St., Room 667
Los Angeles, CA 90012
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Cherry Yap <cherry.yap@lacity.org>

Fwd: DTLA 2040

Brittany Arceneaux <brittany.arceneaux@lacity.org>
To: Jordan Hallman <jordan.hallman@lacity.org>, Cherry Yap <cherry.yap@lacity.org>

Wed, Dec 9, 2020 at 11:04 AM

----- Forwarded message -----

From: **Brittany Arceneaux** <brittany.arceneaux@lacity.org>
Date: Mon, Nov 30, 2020 at 12:45 PM
Subject: Re: DTLA 2040
To: Judy Lee <judy@latierraconsulting.com>

Hi Judy,

It's great to hear from you! Sorry for the delayed response. I'm just getting back to my emails after the holiday.

I apologize about the map. We are working on updating the zone string. The currency proposal for this block includes the MN1 form district. The draft zone should read: [MN1-MK1-5] [CX1-FA] [-CPIO- -].

Your comments have been received and filed. I appreciate your review of the materials and I will share your feedback regarding hotel keys and FAR limitations with the team. We are anticipating additional revisions to the plan before presenting the Plan to CPC in Spring 2021. Please see more details regarding the plan timeline [here](#) under "coming soon".

The department hired a group of consultants to analyze the feasibility of the draft zones. The summary report can be found [here](#).

In regards to the comment period, I completely understand your point regarding the magnitude of materials. We extended the DEIR comment period from 45 days to a total of 120 days. We are not anticipating an extension on the DEIR comment period. We are requesting that plan related comments be provided at the public hearing on December 8th or in writing by December 18th. If you would like to submit written comments on the plan after December 18th we are happy to take those comments, we will just be limited on what we can incorporate in the next draft of the plan.

Please let me know if you would like to discuss any of these topics further. I'm happy to set up a call.

Best,
Brittany

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On Tue, Nov 24, 2020 at 2:57 PM Judy Lee <judy@latierraconsulting.com> wrote:

Hi Brittany,

I hope this message finds you well. Happy holidays! Feel free to call me to discuss this:

I'm finding the zoning designations for Chinatown confusing. Using [801 North Spring Street](#) as an example, on the interactive draft zoning map, the zoning string is [DM2-MK1-5] [CX1-FA] [-CPIO- -] but the property profile is hyperlinked to the MN1 form district. Which one is correct?

I met with and have been asked by stakeholders who actually live, work and / or own property and businesses in Chinatown to review the DTLA 2040 documents relative to current land use regulations.

Generally, there is concern about the base allowances along commercial corridors. It appears that most of Broadway is designated for the MN1 form district which limits the base and maximum bonus FAR and height to 2.0:1 and 6.0:1 and

three and five stories, where most of the properties are currently designated as Regional Commercial and C2-2 which allow a 6.0:1 FAR, unlimited height and R5 density if we use the mixed-use exception, including no limitation on hotel keys. I have one active project in Chinatown where we propose 120+ keys; under the draft regulations, the project would be limited to 49 keys because of its CX1 use district designation. What is the rationale for limiting hotel keys in this way? No matter how large the lot or buildable area, a hotel project is limited to 49 keys..?

Regarding areas that are allowed a height of up to 12 stories to 15 stories: The general consensus is that construction typology and costs make 12- to 15-story buildings in the LA market unrealistic. That's why most buildings in LA are typically about eight stories (wood / podium construction) or 20-plus stories (concrete / steel). Projects don't "pencil" with steel construction unless they are a minimum 20-plus stories. I'm curious if DCP retained a consultant to analyze the economics of the proposed development standards?

Lastly, who should we speak with to request an extension on the comment period? Chapter 1A alone is 980 pages. I haven't even begun to review the CPIO and the community plan.



Regards,

Judy Lee
Mobile: (949) 829-3286
Sent from a mobile device



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Cherry Yap <cherry.yap@lacity.org>

Fwd: Comments on DTLA Draft EIR, ENV-2017-433-EIR

Brittany Arceneaux <brittany.arceneaux@lacity.org>

Tue, Dec 8, 2020 at 10:20 AM

To: Jordan Hallman <jordan.hallman@lacity.org>, Cherry Yap <cherry.yap@lacity.org>

----- Forwarded message -----

From: **Brittany Arceneaux** <brittany.arceneaux@lacity.org>

Date: Mon, Dec 7, 2020 at 11:22 AM

Subject: Re: Comments on DTLA Draft EIR, ENV-2017-433-EIR

To: Phyllis Ling <pling@yahoo.com>

Hi Phyllis,

Thank you, your comments have been received and filed.

Best,
Brittany

On Fri, Dec 4, 2020 at 4:52 PM Phyllis Ling <pling@yahoo.com> wrote:

Dear Ms. Arceneaux,

I am writing to express support for the recent changes in the Fall 2020 draft of the DTLA 2040 Community Plan that address community feedback toward the need to strengthen incentives for affordable housing in the Chinatown area. Especially in this part of the city, but also throughout the state, there is a shortage of affordable housing, not a shortage of luxury or market-rate housing. I support reductions in base FAR and height limits to further incentivize the building of affordable housing, especially since parking minimums are being eliminated. Furthermore, affordable housing should not only consist of micro-units, but residential housing that serves families, such as two and three-bedroom units. Including a mix of housing types is an important part of a community plan that is sustainable, equitable, and inclusive.

Regarding the Draft EIR specifically, I ask that more be done to mitigate damage and destruction to the Zanja Madre. The Zanja Madre should be afforded as much protection as paleontological and other archeological artifacts.

I ask that mitigation include a more regulated process for applicants seeking grading permits for both discretionary and non-discretionary projects, especially for properties that are adjacent to parcels where known segments of the Zanja Madre have been found. This may require consulting with a historical society or agency to identify parcels that have a high likelihood of containing segments of the Zanja Madre, such as parcels adjacent to the the Metro Gold Line/LA State Historic Park property, and those adjacent to or in-line with the Blossom Plaza property. In these zones, there should be required archeological monitoring as a part of the grading or excavation permit, rather than a warning letter with recommendations.

As to why these mitigation efforts are needed, I point to an article by Carren Jao of KCET in 2014, titled "Are We Doing All We Can for the Zanja Madre?", regarding the treatment of the Zanja Madre at Blossom Plaza:

<https://www.kcet.org/shows/earth-focus/are-we-doing-all-we-can-for-the-zanja-madre>

In it, photographer and historian William Preston Bowling comments on the treatment of the Zanja Madre at the Blossom Plaza construction site:

"In Bowling's eyes, the site was far from the traditional image of painstaking archaeological digs often depicted in mainstream media. Instead of tarps covering sensitive portions of the site, brushes to be used for gentle sweeping of artifacts, and clipboards meticulously scribbled with notes on every little thing, Bowling witnessed an almost cavalier treatment of the 100-foot section of the Mother Ditch.

Some issues that concern him is the apparent lack of oversight by trained archaeologists, the use of machinery on the site, and the offhand attitude of construction workers of artifacts uncovered. His worries were further fed upon seeing the photos published by the Los Angeles Times, which showed workers (not archeologists) walking on top of the Zanja and old smoked glass bottles littering the ground "like discarded beer cans."

What are the chances that additional sections of the Zanja Madre will be uncovered in Chinatown in the next 20 years?
I ask that we do more to plan for this eventuality.

Sincerely,

Phyllis Ling

Savoy St Resident and Property Owner

Phone: 213-880-8663



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Cherry Yap <cherry.yap@lacity.org>

Fwd: Public Comments for Dec 8, 2020 LA city Planning Meeting

Brittany Arceneaux <brittany.arceneaux@lacity.org>

Mon, Dec 7, 2020 at 12:11 PM

To: Cherry Yap <cherry.yap@lacity.org>, Jordan Hallman <jordan.hallman@lacity.org>

----- Forwarded message -----

From: **Brittany Arceneaux** <brittany.arceneaux@lacity.org>

Date: Fri, Dec 4, 2020 at 10:57 AM

Subject: Re: Public Comments for Dec 8, 2020 LA city Planning Meeting

To: Hayk Makhmuryan <hayhayk@yahoo.com>

Cc: Charles Porter <charlesp@socialmodel.com>, Henriette Brouwers <henriette@lapovertydept.org>

Hi Hayk,

Thank you for your thoughtful feedback. Your comments have been received and filed.

Best,
Brittany



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On Thu, Dec 3, 2020 at 12:36 PM Hayk Makhmuryan <hayhayk@yahoo.com> wrote:

Hi Brittany,

I'm writing to submit public comments for the LA City Planning public hearing on Dec 8, 2020. Specifically about the critical importance of incorporating Skid Row Now and 2040's vision into the DTLA plan.

Please find video links to two public comments here:

1) From Hayk Makhmuryan: <https://we.tl/t-nhydKvowAZ>

2) From Ollie Linden: <https://wetransfer.com/downloads/6affc83845f7626dc45d2ae07f246d4120201203041348/0e9e3357196e9433274cb3240cc81f4520201203041409/5ab417>

Additionally, I'd like to submit a written comment for the record -

My name is Hayk Makhmuryan. I run a community arts space called Studio 526 in LA's Skid Row neighborhood, have been involved in Skid Row since 2008, and I organize around housing justice. Regionally, I am a member of Los Angeles County's Cultural Equity and Inclusion Advisory Committee.

I demand the expansion of the affordable housing only zone, the iX1 zone, with housing for extremely low and deeply low-income levels, to the existing legal Skid Row neighborhood boundaries, 3rd to 7th Street, and Main St to Alameda. This commitment to Skid Row boundaries is pivotal and key. In addition, I demand a commitment to tangible steps in implementing all the recommendations and points in Skid Row Now and 2040 vision (<https://www.lapovertydept.org/wordpress/wp-content/uploads/2019/06/SRN2040Vision.pdf>).

I'd like to use my public comment to drive home the point that with equity or even equality in mind, the Skid Row Now and 2040 vision--all point in it together--are the baseline, the critical minimum for real, meaningful, community improvement without displacement.

The current LA City Planning proposal decapitates and cuts off limbs from an already really hurting neighborhood. Skid Row is a working class poor residential neighborhood, with a large unhoused population, and it is a predominantly black and POC community. The fact that black and POC neighborhoods are hardest hit by the violence of poverty and stripping of resources

is chillingly predictable in our country.

This year has shown so clearly to all of us that institutional normalization of anti-blackness and criminalization of the poor affects us at every level, with black and brown lives disproportionately destroyed because of inequalities in housing, education, health care, justice system, many times over.

The white supremacist history and present in policies and laws is so key to understand how Skid Row is treated, that I believe its important to illustrate it further here. Paraphrasing and channeling Bryan Stevenson’s work against white supremacy, let’s imagine we were in present day Germany. Statistical evidence shows that Jewish citizens get disproportionately hit by housing, healthcare, and education inequities, as well as prosecutions and jail times; Jews are routinely excluded from jury service. Further imagine that neighborhoods populated mostly by Jews have the least resources available to them. And THEN, imagine the government proposes to take away 75% of one already deeply marginalized Jewish neighborhood.

That would be an international outrage.

I imagine that you do not think of yourselves as racist or anti-poor. Expanding the i X 1 zone to all of Skid Row is the absolute least you can do to be on the right side of history.

Thank you.

--

Hayk Makhmuryan

(pronouns: he/they (what's this?))

Art Worker, Community Organizer

equitable access to arts, cultural, and social spaces is a fundamental human right.

love the people, decommodify life.

doodleswithoutborders.com



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December 3, 2020

Dear Brittany and Craig,

The future of Downtown Los Angeles is exciting!

I have owned and operated several family businesses since 1986 and my family has been in business in the area since 1948. Currently, I am the owner of the California Flower Mall. We welcome the improvements to the neighborhood as they will have numerous positive effects on my business as well as the overall area. We share the City's vision, as articulated in the draft Plan, to **"...promote a dynamic, healthy, and sustainable Downtown core that is well connected to and supports the City of Los Angeles and the region."**

For many years, we have worked extremely hard with our fellow business owners to provide a clean and safe environment for business to survive and supporting our local economy, despite the day to day issues we all face. We understand no one is an island, but investments in the district improves the quality of life for the area.

We appreciate the City's Planning Department working closely with our downtown Districts, local business and property owners, and the community to address many of our concerns in the latest draft Plan.

While we support most of the revised draft Plan (November 2020), we want to submit the following **specific concerns and requests for changes to the City for review and consideration:**

- Remove restrictions on new housing
- Increase minimum floor area ratios
- Allow hotels in the IX2 Use District
- Increase building heights
- Ensure COVID pandemic related flexibility

T 213-488-1983 **F** 213-488-0973

825 South San Pedro Street, Suite 200, Los Angeles, California 90014

californiaflowermall.com



- Allow market rate housing in the Central City East area
- Adopt DEIR Alternative #3 to address the ongoing housing crisis and SCAH RHNA mandates
- Make the Community Benefits Program more financially feasible

Each of these items is further explained and expanded upon in the [LA Fashion District's Response Letter](#) for you to reference.

Thank you for your consideration on these important items. We look forward to further refinements of the visionary DTLA 2040 Plan.

Respectfully,

Mark Chatoff
President, CFM
Founding Board Member, Past Chair & Current Board Member, Fashion District BID

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STUDIO- MLA

251 South Mission Road
Los Angeles, California 90033
T. 213 384 3844

studio-mla.com

December 4, 2020

Brittany Arceneaux, City Planner
City of Los Angeles Department of City Planning
200 North Spring Street, Room 667
Los Angeles, CA 90012
Via email: brittany.arceneaux@lacity.org
Revised and final version sent: 12/4/2020 at 5:10pm

RE: Comments on ENV-2017-433-EIR: DTLA 2040 Draft Environmental Impact Report (DEIR)

Dear Ms. Arceneaux,

Studio-MLA is a design studio that integrates landscape architecture, urban design, and planning to create places that inspire human connection, unite communities, and restore environmental balance. Advocacy is a foundation of our practice – a powerful tool to catalyze ecological and social change with inclusivity and authenticity. We believe in the transformative power of design to recalibrate the natural and built environments that connect us.

It is with this approach that we would appreciate your consideration of the follow comments to the DTLA 2040 Draft Environmental Impact Report.

- Allow more flexibility for housing in the Arts District and Fashion District and do not limit housing to live/work units.
- Remove the ban on market rate housing around 5th to 7th and San Pedro to Central as to not segregate communities by income.
- Height limits need to be reconsidered for the areas that are a part of the Downtown Community Plan. These neighborhoods are served by critical transportation where density should be allowed.
- Incorporate specific requirements for Community Benefits program to promote by-right development and decrease the need for projects to be approved on a subjective, one-off basis under discretionary review.

STUDIO-MLA

- Provide a more substantial FAR bonus for affordable housing.
- Eliminate industrial exclusive zoning to provide more flexible zoning to flexibility long term.

The Downtown Community Plan and New Zoning code should also reflect the vision and work that has been done on the LA River. The code should be flexible and allow the parcels adjacent to the river to respond to its context, strengthen sense of place and become a tangible corridor supporting urban development, habitat, parkland, and human experience.

Some of our suggestions include

- A special overlay in downtown along the LA River that creates a “hybrid industrial” form that reclaims and opens access to the riverbank.
- Reverse the trend of buildings turning their backs to the river. Create a frontage district that encourages walking, biking, picnicking, etc. along the river
- Density that takes advantage of the first-mile-last-mile connectivity provided by the LA River Path and planned Metrolink station
- Encourage typologies such as overlooks that bring people closer to the river.

We appreciate your consideration of these comments and look forward to the Plan’s adoption.

Sincerely,

A handwritten signature in black ink, appearing to read 'Mia Lehrer', with a long, sweeping underline.

Mia Lehrer, President
MLA Green, Inc., d.b.a.: Studio-MLA



December 1, 2020

Brittany Arceneaux, City Planner
City of Los Angeles Department of City Planning
200 North Spring Street, Room 667
Los Angeles, CA 90012
Via email: brittany.arceneaux@lacity.org

Re: Comments on ENV-2017-433-EIR: DTLA 2040 Draft Environmental Impact Report (DEIR)

Dear Ms. Arceneaux,

Established in 1924, Central City Association is an advocacy organization committed to DTLA’s vibrancy and increasing investment in the region. We are a membership organization comprised of approximately 300 members and our membership reflects the diversity of DTLA including housing builders, nonprofit organizations and large employers. We are committed to the DTLA 2040 Community Plan and making sure that it advances DTLA’s growth and serves as a model for other areas in the city that are proximate to transit. We offer this letter to comment on the Draft Environmental Impact Report (DEIR) for DTLA 2040 and to raise key issues within the plan that we believe inhibit much-needed housing production amid a housing and homelessness crisis and will hinder economic recovery from the COVID-19 pandemic and future economic growth. **Importantly, the DEIR for this plan was prepared in a vastly different context than today -- prior to the COVID-19 pandemic and resulting economic depression, before the City was assigned a housing production goal of over 455,000 for the next eight years and apart from state and federal infrastructure considerations. As such, we strongly encourage the adoption of Alternative 3 in the DEIR to allow for the greatest housing and development capacity and flexibility to spur DTLA’s recovery and best position the heart our city for private and public investment (REC #1).**

We believe that DTLA 2040 cannot be considered in a vacuum separate from the conditions affecting DTLA and the city at large, and what is at stake for our future. Our detailed comments on the plan herein are informed by three major considerations:

1. The deep impacts of the COVID-19 pandemic on DTLA and the City’s economy and future growth;
2. The persistent housing and homelessness crisis, and unprecedented City housing production responsibility of over 455,000 new units over the next eight years alone, per the 6th Cycle Regional Housing Needs Assessment (RHNA); and
3. The need for local land use plans to demonstrate a clear and substantial commitment to transit-oriented growth to compete for state and federal transportation infrastructure funding.

1. The Impacts of the COVID-19 Pandemic

While COVID-19 has impacted every community, DTLA, the city’s urban high-rise core, has faced unique challenges as perceptions of urban living contributing to pandemic spread have perpetuated. Office towers are nearly empty, and many retail and restaurant businesses are shuttered which will likely persist for years to come as the pandemic has resulted in permanent job losses and shifts to remote work. DTLA normally receives over 22 million visitors in a given year, serving as an anchor of our local economy, but a depressed tourism market without conventions or events is reflected in an astoundingly low hotel occupancy rate of about 40 percent and drops in revenue per available room of over 50 percent compared to last year.¹ Apartment dwellers have increasingly looked to live

¹ *Second Quarter 2020 Downtown LA Market Report*, Downtown Center Business Improvement District:
<https://ctycms.com/ca-dtla/docs/dtla-market-report-q2-2020.pdf>

outside the city center, and residential rents have fallen by seven percent compared to last year and vacancy rates are near 15 percent.²

The pandemic has dramatically changed the landscape of DTLA. Projects that were previously financially viable have greatly diminished in value. We're hopeful that DTLA's economic prospects will strengthen as restrictions are lifted, successful vaccines are obtained and made widely available and perceptions of urban life improve. However, it may be some time before circumstances get better, and DTLA 2040 must be sensitive to this economically vulnerable context if we are to continue to see new growth and community benefits in DTLA.

2. The Housing and Homelessness Crisis and RHNA Obligations

As the Southern California Association of Governments (SCAG) finalizes the 6th Cycle RHNA, it's clear that the City of Los Angeles will be responsible for delivering an incredible amount of new housing by the order of more than 455,000 units between 2021 to 2029. The magnitude of this housing target cannot be overstated – in the City's history, only 420,000 units were built at the peak of housing production over the course of 20 years between 1960 to 1980. At the same time, homelessness in the city continues to increase, growing by over 14 percent last year reaching more than 41,000 unhoused people living in the city, 16 percent of whom are in DTLA which is the largest concentrated street homeless population in the nation. While this housing goal stands out as seemingly astronomical, in reality it reflects a persistent housing and homelessness crisis that has long-been one of the major issues facing the city and region, but left largely unaddressed by solutions of the necessary scale.

The DTLA 2040 plan notes that SCAG projects that DTLA will make up over 20 percent of the city's growth over the next two decades, which is a significant share of the City's RHNA target and means that at least 12,000 units per year on average need to be built in DTLA over the next eight years alone. As the region's transit and job hub, DTLA must play an outsized role in meeting this ambitious goal, requiring DTLA 2040 to provide substantial capacity for new growth. Alternative 3 of the DEIR is the superior alternative as it would enable the greatest growth and housing production.

3. Competing for State and Federal Infrastructure Funding

State and federal funding for transportation and other infrastructure projects are increasingly tied to land use plans that provide substantial new opportunities for growth and development near transit. Moreover, current efforts to establish an Enhanced Infrastructure Financing District (EIFD) in DTLA offer the promise of a dedicated local source of funding for an array of public benefit projects, including affordable housing, in DTLA that can also help attract supplemental state and federal funding, but can only be impactful if supported by land use planning that promotes new development to bolster property tax increment growth.

As we continue to build out our regional transit system, revamp our bus network to be world class and dedicate resources to making DTLA and our city truly multimodal, the success of these major investments will be dependent on coordination with visionary planning for new development in tandem. It is also critical as we look ahead to draw new public and private investment to DTLA and our city – DTLA 2040 must be a clear signal to this end.

We believe much of the plan as proposed is a great improvement to DTLA's land use and planning framework and we are appreciative of City Planning's outreach and engagement, and the important changes already made to the plan over the course of its development. We recognize that DTLA 2040 is an enormous undertaking for City Planning as it will be the first community plan to implement the new citywide zoning code. We appreciate the significant resources dedicated to the plan's development and are pleased that DTLA continues to be the City's laboratory for new ideas, but DTLA 2040 must go even farther to promote a bold, exciting and resilient future for our city center. **We offer this letter to strongly encourage adoption of Alternative 3 in the DEIR and to provide detailed suggestions to enhance the plan, with the goal of a connected, equitable and inclusive DTLA that has a broad range of housing**

² Ibid.



options and affordability, park space, education and childcare facilities and diversity in mobility and employment opportunities.

Building off of our [January 21, 2020 letter](#), we’ve broadly categorized our recommendations as follows: 1) maximizing opportunities for housing at all income levels, including middle-income housing and 2) creating flexibility within the plan to be adaptable over the next two decades. Underpinning this all, we are focused on a plan that can support financially feasible development, which is critical to yielding the housing growth and maximum community benefits envisioned in the plan as well as depoliticizing development in DTLA.

Maximizing Opportunities for Housing, Including Middle-Income Housing

CCA strives to make DTLA the place for new housing at all income levels. Despite being just one percent of the city’s land, DTLA accounts for over one-third of new apartment units built in the city over the past decade. Ensuring that substantial new housing can continue to be built in DTLA is essential to addressing our regional housing crisis and meeting our RHNA and environmental sustainability goals by focusing growth in the densest and most transit- and job-rich area of the city.

On paper the plan would generally expand where housing is allowed from 33 percent of the plan area to 60 percent and major changes toward parking policy like eliminating minimum parking requirements are important steps to supporting project feasibility and fostering high-quality development appropriate for urban cores. Additionally, we appreciate the recent revision to the plan to no longer count above-ground parking toward project FAR, which would have had diminished capacity for housing. Still, there are specific provisions throughout the plan that would negatively impact the feasibility of housing development in practice. We believe the following provisions are problematic as proposed and offer suggested solutions that reasonably accommodate plan intent and economic feasibility.

Financial Feasibility of the Community Benefits System

The plan’s proposed Community Benefits System would allow developments to maximize FAR and build larger than otherwise allowed under the base zoning in return for providing certain public benefits, namely affordable housing, publicly-accessible open space and community facilities. This new system would apply throughout the plan area and replace the Transfer of Floor Area Rights (TFAR) program that currently applies only to South Park, the Financial District and parts of the Historic Core. We are generally supportive of the proposed concept of the Community Benefits System, and we share the goal of realizing more on-site public benefits, especially affordable housing. We are also pleased to see recent changes to the Community Benefits System that provide clearer upfront standards to enable Level 2 benefits like open space and community facilities through a by-right process rather than via discretionary review. However, we are concerned about specific provisions that impact the financial feasibility of utilizing the bonus FAR, particularly for high-rise projects at this immensely economically challenging time for DTLA.

The economic fallout from the pandemic presents major issues for building in DTLA, but it’s important to note that the Community Benefits System, primarily the affordable housing bonus provisions, poses challenges for the financial feasibility of development even in strong economic conditions. As shown in the table below, Level 1 of the DTLA 2040 Community Benefits System is essentially aligned with the City’s Affordable Housing Density Bonus and Tier 1 of the Transit Oriented Communities (TOC) Program in terms of the percentage of affordable housing required by income level (with the exception of options for Deeply Low and Moderate Income housing under DTLA 2040). However, the FAR bonus for providing affordable housing is 35 percent, which is at the lowest end of the City’s affordable housing incentive programs in alignment with the Density Bonus.



Comparison of DTLA 2040 Level 1 Affordable Housing Incentive Program and Other City Affordable Housing Programs

		TOC Tier 1	TOC Tier 2	TOC Tier 3	TOC Tier 4	Affordable Housing Density Bonus	DTLA 2040 Community Benefits Program Level 1
Affordability Requirements	Deeply Low	n/a	n/a	n/a	n/a	n/a	5%
	Extremely Low	8%	9%	10%	11%	n/a	8%
	Very Low	11%	12%	14%	15%	11%	11%
	Low	20%	21%	23%	25%	20%	20%
	Moderate	n/a	n/a	n/a	n/a	n/a	40%
Bonus	Density Increase	50%	60%	70%	80%	35%	n/a
	FAR Increase	40%	45%	50%	55%	35%	35%

The Density Bonus and TOC programs have been effective at producing mixed-income developments with on-site rent-restricted affordable housing elsewhere in the city. However, most development in the city outside of DTLA is mid-rise wood frame construction, which is a less costly type of construction than the high-rise concrete and steel construction that is typical in DTLA. Type I projects, which are generally high-rise buildings made of concrete and steel, cost an average of \$71 per square foot more than other construction types like Type V wood frame buildings.³ Coupled with adverse economic conditions, this means that high-rise construction in DTLA faces higher costs for lower value. We believe DTLA is the best place for high-rise construction, which is the most efficient way to build a high volume of housing near transit, and is largely built with unionized labor, providing well-paying jobs. **We recommend that Level 1 of the DTLA 2040 Community Benefits Program provide a more substantial FAR increase to support the feasibility of high-rise construction. We also believe that the ability to contribute an in-lieu payment or partner with an affordable housing provider to provide affordable units off-site are good, important features of the Community Benefits System that must be maintained as they offer necessary flexibility (REC #2).**

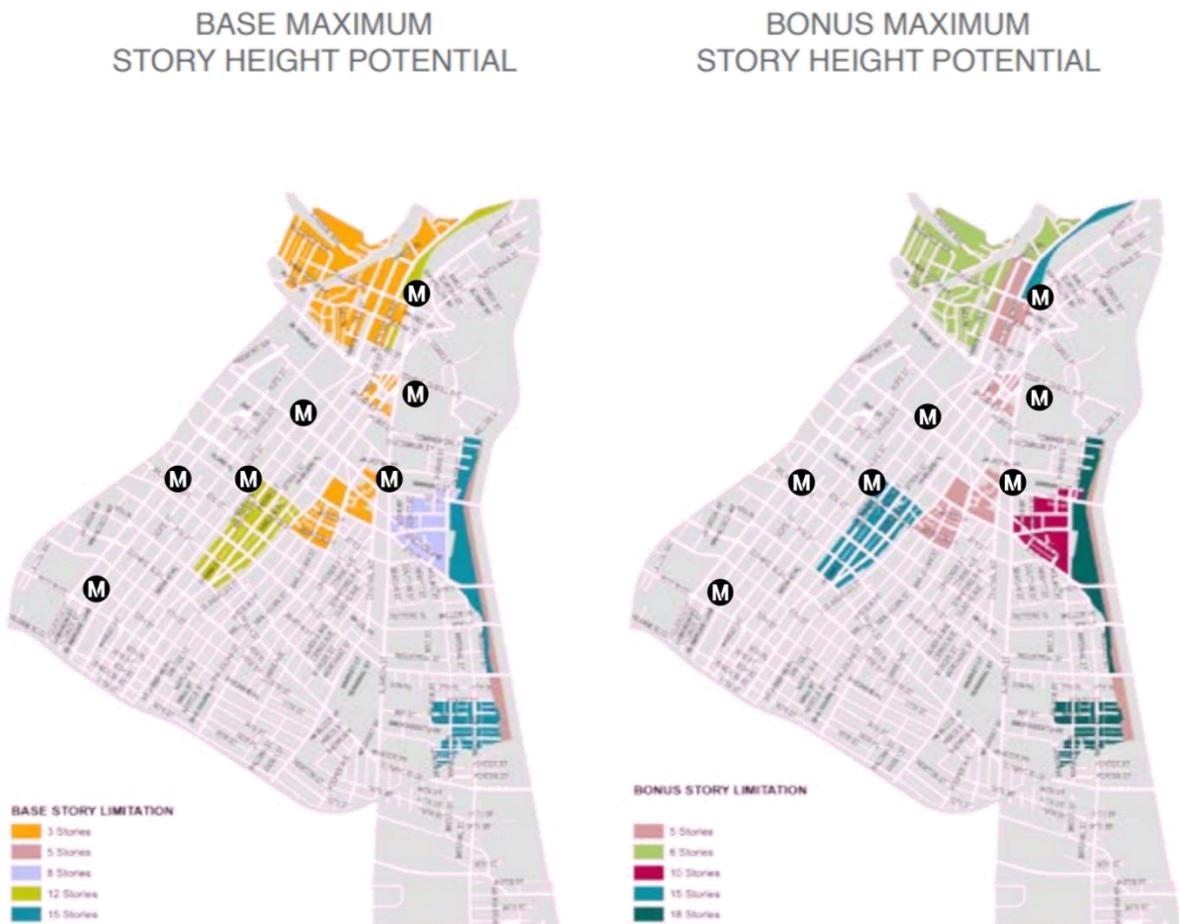
Additionally, we are concerned about recent changes to the plan whereby base FARs were reduced in Chinatown, Little Tokyo and areas of the Historic Core and Fashion District. The changes are substantial: from 6.0 to 2.0, a 66 percent decrease, in Chinatown and Little Tokyo, and from 7.0 and 6.0 to 3.0, a 60 percent and 50 percent decrease respectively, in the Historic Core and Fashion District. While we understand the intent of these changes is to ideally increase usage of the Community Benefits System, we are concerned that this is too dramatic of a change that tips the scales of project economics to be economically infeasible. These are walkable, transit-rich areas where we want to promote growth, but the reductions in base FAR create a de facto scenario where the FAR is too low to build a viable project under the base FAR allowances on the one hand while simultaneously placing a large financial onus on projects to obtain bonus FAR via the Community Benefits System. Because the Level 1 affordable housing FAR bonus is 35 percent of the base FAR, the Level 1 bonus is necessarily reduced as well (for example, a 35 percent bonus on 6.0 base FAR is an additional 2.1 FAR, but is only an additional 0.7 FAR on a 2.0 base FAR). The October 2019 financial feasibility analysis of the Community Benefits System prepared by HR&A Advisors for the City specifically highlights this issue, stating that Chinatown and a large swath of the Fashion District leading into the Historic Core, where most of these FAR changes would apply, “are unlikely to support larger high-rise developments until market performance matures further, and thus are not able to support public benefits to the same degree as Place Types with strong submarkets.” **As it’s clear that these recent reductions in base FAR would jeopardize development feasibility, we firmly recommend maintaining base FARs as they were proposed prior to the Fall 2020 changes to the plan. (REC #3).**

³ *The Hard Costs of Construction: Recent Trends in Labor and Materials Costs for Apartment Buildings in California*, UC Berkeley Turner Center for Housing Innovation: http://turnercenter.berkeley.edu/uploads/Hard_Construction_Costs_March_2020.pdf

Building Height Limits and Minimums

As shown in the map below, the plan would impose base and bonus (with use of the Community Benefits Program) maximum building height limits in Little Tokyo, the northern portion and eastern edge of the Arts District, Chinatown, and Historic Core, all of which are close to existing Metro rail stations. There are also major transit projects in these areas in the pipeline, like the Regional Connector, West Santa Ana Branch and Streetcar. Like the reduction in base FARs, we take issue with the proposed building height limits, particularly in areas near transit stations as we are investing hundreds of billions of dollars in building out our transit system and as these are exactly the areas we need our city to grow to become less car-dependent and more affordable and sustainable. It is essential to demonstrate our commitment to growth in areas near transit as we compete for infrastructure funding from the state and federal governments.

Base and Bonus Height Limits with Existing Metro Stations



We recognize the need to preserve DTLA’s historic neighborhoods, communities and buildings but are concerned about the proposed approach. Blanket height limits are not an appropriate tool for neighborhood preservation. Historic districts and buildings should be considered through the requisite historic preservation and landmarking processes, which is much more targeted and would not inhibit growth on sites that might not have historic or cultural

significance. Additionally, we believe that context-sensitive growth can occur with the use of urban design tools like setbacks and street frontage requirements.

Furthermore, in many cases, the proposed building height limits are not aligned with the economic realities of development and the constraints of relative construction materials. For instance, mixed-use buildings can generally be built with wood frame over a concrete parking and retail podium to a maximum of eight stories under the building code, and buildings made of concrete and steel can be taller but typically need to be a minimum of 20 stories to be financially feasible and justify the additional costs of the more expensive labor and building materials. Some of the proposed base and bonus height limits in areas of DTLA are 12 stories and 15 stories, respectively, and 15 and 18 stories, respectively. With a few exceptions for large sites that can accommodate a lot of building capacity, most mixed-use developments will not even be able to build to the base height limits of 12 and 15 stories, and these height limits will act like an eight-story limit in reality. This means that the growth envisioned by the plan may not actually occur and the resulting community benefits will also not be delivered.

To promote context-sensitive growth and density near transit, respect neighborhood character and appropriately preserve historical assets in a way that reflects the economic realities of development, we recommend that building height maximums be removed and instead utilize FAR, setbacks and frontage requirements to govern building height and massing, and that historic communities be considered instead through the established historic preservation processes (REC #4).

Conversely, the new zoning code proposes to include building height minimums, which may also be problematic and limit the potential for new development. While the intent of this is clearly to encourage, and even require, high-rise development, the reality is that high-rise development may not be feasible in certain locations or for certain uses including most affordable housing developments. For instance, K-12 schools, which are incentivized as a Tier 2 community benefit, typically require one-story or other generally low-rise construction, but they would be precluded in many areas. **We recommend that minimum building height requirements be removed to avoid unintended outcomes like limiting the potential for vacant or underutilized land to be redeveloped into desirable uses like affordable housing, schools or mid-rise mixed-use developments (REC #5).**

Transit Core General Plan Land Use Designation

Similar to our concerns about base FAR reductions and building height limits near transit, we believe the Transit Core General Plan land use designation is not being appropriately applied in connection with where transit exists now and in the future, and that we must do more to leverage public investment in transit infrastructure. The Transit Core designation allows projects that use the Community Benefits System to calculate FAR using the centerline of the street, which has been a successful feature of the current Transfer of Development Rights (TFAR) system that allows projects in DTLA to be larger and yield more public benefits. **We recommend that the Transit Core General Plan land use designation be expanded to include all areas close to existing, entitled and future transit to maximize development opportunities (REC #6).**

Limits on Housing in Hybrid-Industrial Areas

The plan effectively limits new housing in the Fashion District and Arts District to live/work units only. While recent updates to the plan would technically allow more types of housing in the Fashion District, there is a requirement that projects with housing be coupled with a minimum of 1 FAR of office or light industrial space, unless they are live/work. As there is very little demand for new office or light industrial uses in these areas, and with the uncertainties around these uses resulting from COVID, we believe the code as written will have the effect of limiting development in hybrid industrial areas to live/work.



We understand that the City may be constrained in this area by the Framework Element of the General Plan, which essentially limits the ability to rezone industrial areas and requires some amount of “jobs-producing” uses. However, we do not believe that a document adopted 20 years ago should inhibit our ability to plan for another 20 years into the future and cause us to settle for live/work housing when we want to create inclusive, dynamic neighborhoods.

In general, live/work units require high floor to ceiling heights and must be built to commercial standards so are typically more expensive to design and build than a residential unit. The plan requires that live/work units in a project must be a minimum average size of 750 square feet in the Fashion District and 1,000 square feet in the Arts District, which is very economically and spatially inefficient for studios and one-bedroom units. Because they are lofts and lack the walls or partitions of conventional apartments, they are generally not good units for families; requiring these kinds of units is inherently exclusionary. Lastly, they are also impossible to monitor to ensure that they are supporting economic “job-producing” activity, rather than just serving as costly residential lofts.

We recommend that City Planning adopt an amendment to the Framework Element in tandem with DTLA 2040, which will allow for far greater flexibility to plan hybrid industrial areas as mixed-use neighborhoods with a diversity of housing types (REC #7). In lieu of amending the Framework Element, we believe that there could still be more flexibility for different housing types in Hybrid-Industrial areas. **In the absence of an amendment to the Framework Element, we recommend that for projects that include more conventional multi-family housing, set the commercial space requirement as 10% of building area, which will create fairer rules for all projects than the current requirement that is based on lot size, especially those that don’t use a site’s full FAR (REC #8).**

The proposed IX4 Use District that applies to the Arts District also requires that all new structures be built entirely as Type I, II or IV construction, which largely excludes the use of wood materials. As mentioned earlier, wood is more affordable and sustainable than concrete and steel building materials. Wood has also been successfully used to build compellingly designed buildings in the Arts District and throughout the city. Amid our current housing crisis, greatly reducing the ability to use wood construction is counterproductive and runs counter to our goal of making DTLA the place for housing at all income levels. **DTLA 2040 is seemingly the first community plan that has attempted to dictate construction types and we believe such a determination is out of scope for zoning codes to mandate and should be left to building and safety codes – we recommend that this requirement be removed from the plan (REC #9).**

Ban on Market Rate Housing

As proposed, DTLA 2040 will not allow market rate housing in a specific area of DTLA from 5th to 7th Streets and San Pedro Street to Central Avenue. We echo and fully endorse the report titled [The Voices of Central City East](#) submitted by the Central City East Association (CCEA) regarding this neighborhood of DTLA.

As CCEA highlights, the intent of banning market rate housing in this area may be to preserve existing affordable housing and single room occupancy hotels, but it is unnecessary given covenants, the Residential Hotel Conversion and Demolition Ordinance, the Wiggins Settlement and predominance of housing that is owned by non-profit organizations with a mission to provide shelter to vulnerable populations. This area contains the largest concentration of unsheltered homeless people in the nation. It is an area of extreme poverty and need. Banning market rate housing would further concentrate poverty in this area of DTLA and run counter to stated DTLA 2040 plan goals of inclusive and diverse neighborhoods.

To date, there are no market rate developments, built or proposed, in this area. Imposing this provision would only freeze the current conditions and further a failed policy of containment. We believe this policy also directly conflicts with the federal mandate to Affirmatively Further Fair Housing (AFFH). Affordable housing is an important part of DTLA 2040, and it should be integrated throughout the plan area. We strongly support housing opportunities for all incomes across DTLA as the primary tool to address the complicated and extensive challenges of homelessness and poverty in our city.



It's important to recognize that the Community Plan, which is a land use and zoning plan, cannot alone address the challenges of this area. Truly meeting the needs of this area requires a much broader effort that involves mental health, workforce development and social services, which will take coordination from multiple departments and organizations, which we support and encourage.

We support CCEA's report and recommendations, and likewise recommend that the ban on market rate housing from 5th to 7th Streets and San Pedro Street to Central Avenue be removed from DTLA 2040, and instead urge City Planning to consider ways the area's zoning can be tailored to produce mixed-income developments and socioeconomic integration and inclusion (REC #10).

Micro-Units

CCA has been strongly supportive of micro-unit housing, including publishing a [white paper on micro-units](#) and advocating for a [proposal put forth by Councilmember Cedillo](#) for the City to assess barriers and policy changes to support micro-units. The Community Plan Text includes micro-units as a priority for new housing types (LU 2.6), however there is an important missing policy tool that would help effectuate this goal.

A simple but meaningful policy change would be allowing affordable units to be a different mix than market rate units in the same building, but still require the same amount of overall affordable floor area. The unit finishes, access points for entry/exit and amenities would be identical for the market rate and affordable units. For example, DTLA 2040 could allow two 350 square foot affordable units on par with one 700 square foot market rate unit in the same building. This would be a deviation from the City's [Affordable Housing Guidelines](#), which generally require that affordable units be the same average square footage and number of bedrooms as market rate units in the same building.

We believe that DTLA is an appropriate place for a flexible policy to encourage affordable micro-unit housing because it is dense, transit-rich and walkable, which are all complementary to micro-units. We also believe this is meaningful tool to increase the amount of affordable housing that can be leveraged by non-subsidized development and may help to deliver the workforce, moderate income housing that is currently not being built but is needed.

We recommend DTLA 2040 allow affordable units to be a different mix than market rate units in the same mixed-income buildings, but still require the same amount of affordable floor area as a percentage of overall residential floor area akin to the number of affordable units that would be required of the total number of units (REC #11). This would yield a greater number of affordable housing units while still requiring the same dedication of square footage.

Creating Flexibility Within the Plan to be Adaptable Over the Next Two Decades

DTLA 2040 will guide DTLA's growth over the next 20 years but it is unreasonable to believe that we can adequately plan in anticipation of the changes that will take place over that time. It is fundamentally important that the plan set a strong overarching vision for DTLA but be structured to provide sufficient flexibility to adapt to changes if it is to be a success. When we refer to flexibility, we mean allowing a broad range of land use and development scales, designs and typologies in all areas of DTLA, and with clear, simple approval pathways for minor deviations that may be necessary to facilitate development. We believe that highly specific provisions included in the plan today, even if well-intentioned, may have unintended downstream consequences that will make the plan less useable in the future, and instead result in projects seeking discretionary review or quell development altogether. Here again, we are appreciative that City Planning has recently made important changes that remove unnecessary constraints and create more flexibility in alignment with plan goals with revisions such as no longer requiring schools and child care facilities to obtain Conditional Use Permits (CUPs) in most areas, and not limiting hotels by number of rooms or ground-floor commercial tenants by square footage outside of Chinatown and Little Tokyo. We believe there are additional areas of the plan that can be amended to ultimately make DTLA 2040 more flexible and sustainable, and we outline each area of the plan where we believe provisions are overly rigid and with our recommended revisions.

Approval Processes

We know that City Planning and CCA have a shared goal of ensuring that DTLA 2040 greatly reduces the need for projects to seek discretionary approvals and creates greater capacity for by-right and ministerial approval processes. The approval processes laid out in DTLA 2040 refer back to the Processes and Procedures Ordinance, which is Article 13 of the new citywide zoning code being created as part of the re:code LA project. However, we are concerned that the Processes and Procedures Ordinance has not yet been finalized and adopted, and likely will not be until the middle of 2021. This makes it very challenging to provide detailed comments on the approval processes under DTLA 2040 and creates uncertainty for implications that the Processes and Procedures Ordinance might have on DTLA 2040. We're hopeful that the proposed zoning that is established under DTLA 2040 will produce financially feasible developments, but we know that there's a good possibility that projects with unique circumstances will need to deviate from the baseline zoning to be feasible. **While ultimately providing objective criteria and flexibility in each site's zoning is the best way to avoid issues of uncertainty and discretion in the approval process, we recommend that City Planning provide very clear, administrative clearance processes that are CEQA-exempt for deviations and relief mechanisms like alternative compliance, variances and adjustments (REC #12).**

We also appreciate that the proposed plan creates higher Site Plan Review thresholds for projects that use the Community Benefits System to be 500 units or 500,000 square feet of nonresidential space, up from 50 units and 50,000 square feet of nonresidential space. We have long been advocates for a more sensible approach to Site Plan Review that does not punish dense, urban development, particularly in our urban core. Although we believe the higher Site Plan Review benchmark is certainly an improvement over the very low threshold currently, we believe that affording this only to projects that use the Community Benefits System creates a punitive scenario for projects using only the base zoning and does not account for DTLA's role as the city's center for growth. **We recommend that projects, whether using the base zoning or the Community Benefits System, not be subject to Site Plan Review or other discretionary review processes if they comply with a site's allowable zoning and are not seeking any additional changes (REC #13).** We believe this is logical and is the very purpose of areawide planning efforts like DTLA 2040. Many cities use this model, and San Diego, the nearest big city to do so, is a good example.

Frontage Design Requirements

Through the use of Frontage Districts, the plan would create highly specific design requirements for buildings in the Arts District and Historic Core. Recent updates to the plan relaxed some of these requirements by now allowing buildings in these areas to have balconies, no longer prohibiting features like flat roofs and applying the frontage requirements to only the first few stories of buildings. These changes are improvements, but we believe the Frontage Districts in the Arts District and Historic Core are still very prescriptive and will constrain creative approaches to design and architecture. We continue to work with our members to contemplate how these Frontage Districts can be more flexible. We suggest providing a range for ground-floor heights rather than a set minimum of 22' in the Arts District, changing language for symmetrical lite pattern to be more open such that "glazed openings should be divided into smaller components" or something similar, making base-middle-top a "reference" rather than a requirement so that there is room for architects to interpret incorporation and similarly expanding options for expressing the horizontal and vertical banding "by reference" or "interpretation." **We recommend that City Planning continue to explore ways of modifying the Arts District and Historic Core Frontage Districts to strike a balance between fostering contextual design with the potential for creative approaches and innovation. We welcome the opportunity to collaborate to further consider how this can be accomplished (REC #14).**

Industrial Zoning

The plan expands opportunities for mixed-use development, but there is still a large area of DTLA proposed to be maintained as industrial even though we know that retaining industrial land does not mean retaining industrial jobs or job-intensive uses. We witnessed the number of job-intensive uses like manufacturing convert to less productive

uses like wholesale in DTLA despite the fact that land uses have not been changed in much of DTLA's industrial areas. Between 2002 to 2017, manufacturing jobs decreased by 64 percent while jobs in wholesale trade increased by only six percent within the DTLA 2040 area.⁴

DTLA's economic success over the past two decades has instead been defined by increased livability, with the introduction of substantially more housing, public investments in transit and open space and accompanying amenities like places to shop and eat. This change has attracted new DTLA residents, encouraged more job-intensive and higher-paying businesses to locate here and more visitors to come here, which have replaced industrial-oriented jobs that largely disappeared over the past two decades. As those jobs shrunk between 2002 to 2017, jobs have increased by 14 percent in information industries, 24 percent in professional, scientific and technology services, 44 percent in arts and entertainment, 72 percent in accommodation and food services and 119 percent in health care industries.⁵

We should continue to build on this success and inject new uses into areas where jobs have declined, not perpetuate the decline of those areas by freezing the allowable land uses. Moreover, the few existing schools in DTLA are in industrial areas, meaning we should aim to introduce new active uses to support community building around these schools and support their long-term success.

Industrial areas are not likely to change overnight. Industrial vacancy rates are historically low and industrial rents are historically high, due to supply constraints across the LA area for small-format industrial uses for warehousing and distribution. Even if the zoning were permissive of conversion to other uses, the current market for industrial uses is likely strong enough that these properties would not convert to other uses in the near term. **We recommend that DTLA 2040 not include areas zoned exclusively for industrial uses, and that these areas should instead provide more flexible zoning to allow them to gradually convert to other uses, including housing, over the long term (REC #15).**

Adaptive Reuse

The Adaptive Reuse Ordinance (ARO) was a major catalyst for the revitalization of DTLA following its adoption in 1999. It unlocked the potential of DTLA's beautiful but obsolete historic office and bank buildings to have new lives as quality housing stock, and led to the first major influx of residents in DTLA. However, only buildings constructed prior to 1974 can utilize the ARO by-right, and any built more recently than that must go through an onerous discretionary review process.

We believe that expanding and enhancing the ARO can be an important tool to furthering the economic vitality of DTLA and is needed more than ever as the future of many of our commercial uses face great uncertainty due to the pandemic. We appreciate that City Planning has already made positive updates to the ARO in the draft plan like expanding eligible uses and by exempting certain features like basements and rooftop additions from FAR calculations. **To increase usage of the ARO, we recommend applying it to buildings constructed after 1974 on a rolling basis going forward (REC #16).**

Limits on Hotel Rooms and Ground-Floor Commercial Tenant Sizes

Recent changes to the plan largely removed limitations on hotels by number of rooms and ground-floor commercial tenants by square footage in all areas of the plan except for Chinatown and Little Tokyo, expressed by the CX1 Use District, which limits hotels to a maximum of 49 rooms and ground-floor commercial tenants to a maximum of 5,000 square feet.

⁴ According to data from the U.S. Census Bureau, OnTheMap Application and LEHD Origin-Destination Employment Statistics (Beginning of Quarter Employment, 2nd Quarter of 2002-2017) for the Downtown Community Plan Area.

⁵ Ibid.



Tourism is an anchor of our local economy and is critical to supporting businesses in Chinatown and Little Tokyo. **We recommend that the 49-room limit on hotels be removed in Chinatown and Little Tokyo as there is no clear rationale for this limit, and it is antithetical to strengthening DTLA's role as a major visitor destination (REC #17).** Additionally, unique among other big cities, DTLA 2040 would not allow hotel rooms to have kitchenettes. Rooms with kitchenettes are an increasingly popular lodging option, and are a useful, safe alternative amid the pandemic as dining out is limited. For DTLA to truly be a world class destination, it needs more flexible and adaptive lodging solutions that reflects the way guests travel today and how current events will shape guests' future preferences. **We recommend that DTLA 2040 allow hotel rooms to include kitchenettes (REC #18).** This is also an opportunity for the City to clear up issues of interpretation around extended stay hotels and show its commitment to innovation in lodging options.

Moreover, the intent of the limitation on ground-floor commercial business size seems to be to preserve these areas for small businesses, and/or achieve a small-scale business look and feel. We believe supporting small business growth and preservation is a worthwhile objective, but limiting businesses by square footage is a blunt policy tool that could negatively impact neighborhoods and exclude potentially desirable businesses. For instance, even the smallest grocery stores typically require 7,500 to 10,000 square feet of space, but these limitations would preclude them, despite a strong need for grocery stores in DTLA.

There's also no guarantee that small space limits would result in small businesses occupying these spaces instead of a franchise or chain business – this capacity is likely outside the scope of any Community Plan and would be better addressed through economic development policies. Instead, the Community Plan and zoning code could promote urban design that imbues a small business aesthetic, with awnings, required transparent frontages, plantings and articulation of storefronts. **We recommend that the tenant size limits be removed in Chinatown and Little Tokyo, and that other urban design tools be employed to provide for a small commercial look and feel in targeted areas while working with other City agencies to develop economic development tools to support small business in DTLA (REC #19).**

Public Open Space

The Community Benefits System suggests that public parks and open space must be provided at the ground floor. We believe this may be overly restrictive and prevent creative architecture and landscape design for these spaces. For example, a constrained site with proposed on-site public open space may not be able to provide all the open space at the ground floor but could instead provide terraced, stepped or undulating open space. This flexibility would allow the provision while also providing a unique design. A good local example is the public open space attached to the Walt Disney Concert Hall. **We recommend that the language regarding public on-site open space be expanded to state that it must be "clearly accessible" to the public, rather than required to be on the ground floor (REC #20).**

Transfer of Development Rights (TDR)

DTLA 2040 proposes to create a new TDR system applicable only to the Arts District. We would like to better understand why the TDR system only applies to the Arts District, and whether receiver sites may be outside the designated area or if both donor and receiver sites must be in the area. It is also unclear why SurveyLA or any historic survey may be used under the TDR system when they do not necessarily result in official historic designations. **We recommend that the TDR system be more broadly applicable across DTLA and that the criteria for historic resources be more closely tied to official historic designation (REC #21).**

Downtown Development Corporation & Infrastructure Coordination

Although the creation of a Downtown Development Corporation, an entity that would coordinate infrastructure and development projects and resources in DTLA, is outside of the scope of City Planning, it is worth considering as a policy objective in the Community Plan. The Community Benefits System is dynamic and exciting but is ultimately



limited to public benefits that can be provided by individual development projects on a one-off basis. For example, this means that while we have a broad objective of building more high-quality public open space in DTLA, the Community Benefits System may encourage individual sites to provide relatively small public open spaces, but is generally not designed to contribute to larger-scale open space projects like the redesign of Pershing Square or the Park 101 freeway cap park. These larger-scale projects would be better suited for a Downtown Development Corporation that could leverage public and private funds, and tools like EIFDs currently under study for DTLA and other tax increment financing (TIF) mechanisms. Notably, EIFDs can also fund affordable housing.

We believe that both on-site public benefits with individual projects and large-scale public benefit projects are important and welcome in DTLA. The Community Plan should lay the foundation for both. **We recommend that City Planning include a policy goal to coordinate DTLA 2040 land use planning with EIFD planning being led by LA Metro and the Economic and Workforce Development Department (EWDD) and that DTLA 2040 include the creation of a Downtown Development Corporation to plan, manage and implement large-scale public benefit projects and support funding for affordable housing within its policy objectives (REC #22).**

We know that the future of DTLA will set the course for the future of our city, and the DTLA 2040 plan will serve as the guiding framework for DTLA's growth over the next two decades. This plan is also being considered at a time when DTLA faces incredible uncertainty and adversity due to an unthinkable combination of circumstances including a global pandemic that has resulted in economic depression and questions about the fundamental values of dense urban living, development-related corruption charges against our neighborhood's former City Councilmember, and a persistent housing and homelessness crisis. The moment for leadership and a bold, visionary plan for DTLA could not be more important or necessary. We are pleased to work with you on this tremendously important plan, at an unprecedented time in the city's history. We are grateful for City Planning's continued partnership and look forward to seeing this plan be further refined as it moves through the approval process. Thank you for your consideration.

Sincerely,

A handwritten signature in blue ink that reads "J Lall".

Jessica Lall
President & CEO, Central City Association of Los Angeles

Attachment: Summary of Recommendations

CC: Councilmember Gil Cedillo, Council District 1
Councilmember Kevin de Leon, Council District 14
Councilmember Curren Price, Council District 9
Deputy Mayor William Chun, Office of Mayor Eric Garcetti

Summary of Recommendations

1. We strongly encourage the adoption of Alternative 3 in the DEIR to allow for the greatest development capacity and flexibility to spur DTLA's recovery and best position the heart our city for private and public investment.
2. Provide a more substantial FAR increase for Level 1 of the DTLA 2040 Community Benefits Program to support the feasibility of high-rise construction, and maintain the ability for in-lieu payments or partnering with affordable housing providers to provide affordable units off-site, which offer necessary flexibility.
3. Maintain base FARs as they were proposed prior to the Fall 2020 changes to the plan as it's clear that recent reductions in base FAR would jeopardize development feasibility.
4. To promote context-sensitive growth and density near transit, respect neighborhood character and appropriately preserve historical assets in a way that reflects the economic realities of development, building height maximums should be removed and instead FAR, setbacks and frontage requirements should govern building height and massing, and historic communities instead considered through established historic preservation processes.
5. Remove minimum building height requirements to avoid unintended outcomes like limiting the potential for vacant or underutilized land to be redeveloped into desirable uses like affordable housing, schools or mid-rise mixed-use developments.
6. Expand the Transit Core General Plan land use designation to include all areas close to existing, entitled and future transit to maximize development opportunities.
7. Adopt an amendment to the Framework Element in tandem with DTLA 2040, which will allow for far greater flexibility to plan hybrid industrial areas as mixed-use neighborhoods with a diversity of housing types.
8. In the absence of an amendment to the Framework Element, for projects that include more conventional multi-family housing, set the commercial space requirement as 10% of building area, which will create fairer rules for all projects than the current requirement that is based on lot size, especially those that don't use a site's full FAR.
9. Remove requirements dictating construction types -- DTLA 2040 is seemingly the first community plan that has attempted to dictate construction types and we believe such a determination is out of scope for zoning codes to mandate and should be left to building and safety codes.
10. Echoing CCEA's recommendations, remove the ban on market rate housing from 5th to 7th Streets and San Pedro Street to Central Avenue, and instead consider ways the area's zoning can be tailored to produce mixed-income developments and socioeconomic integration and inclusion.
11. Allow affordable units to be a different mix than market rate units in the same mixed-income buildings, but still require the same amount of affordable floor area as a percentage of overall residential floor area.
12. Provide very clear, administrative clearance processes that are CEQA-exempt for deviations and relief mechanisms like alternative compliance, variances and adjustments.
13. Whether using the base zoning or the Community Benefits System, projects should not be subject to Site Plan Review or other discretionary review processes if they comply with a site's allowable zoning and are not seeking any additional changes.
14. Continue to explore ways of modifying the Arts District and Historic Core Frontage Districts to strike a balance between fostering contextual design with the potential for creative approaches and innovation – our members welcome the opportunity to collaborate to further consider how this can be accomplished.
15. Do not zone areas exclusively for industrial uses – these areas should instead provide more flexible zoning to allow them to gradually convert to other uses, including housing, over the long term.
16. To increase usage of the ARO, apply it to buildings constructed after 1974 on a rolling basis going forward.
17. Remove the 49-room limit on hotels in Chinatown and Little Tokyo as there is no clear rationale for this limit, and it is antithetical to strengthening DTLA's role as a major visitor destination.
18. Allow hotel rooms to include kitchenettes.



19. Remove tenant size limits in Chinatown and Little Tokyo, and use other urban design tools to provide for a small commercial look and feel in targeted areas while working with other City agencies to develop economic development tools to support small business in DTLA.
20. Expand the language regarding public on-site open space to state that it must be “clearly accessible” to the public, rather than required to be on the ground floor.
21. Apply the TDR system more broadly across DTLA and more closely tie the criteria for historic resources to official historic designation.
22. Include a policy goal to coordinate DTLA 2040 land use planning with EIFD planning being led by LA Metro and EWDD and include the creation of a Downtown Development Corporation to plan, manage and implement large-scale public benefit projects and support funding for affordable housing within the plan’s policy objectives.

CHINATOWN STAKEHOLDERS

c/o Summit Western Limited, LLC 970 North Broadway, Suite 111, Los Angeles, CA 90012

December 3, 2020

Brittany Arceneaux, City Planner
Department of City Planning
City of Los Angeles
200 North Spring Street, Room 667
Los Angeles, CA 90012
Via email: brittany.arceneaux@lacity.org

Re: Comments on ENV-2017-433-EIR: DTLA 2040 Draft Environmental Impact Report (DEIR)

Dear Ms. Arceneaux,

We are writing this letter as longtime Chinatown Stakeholders (“Chinatown Stakeholders”) including business owners, property owners and community members who cumulatively have over 350 years of ownership and experience in Los Angeles’ Chinatown.¹ We have reviewed the Draft DTLA 2040 Plan (“Plan”) and the associated Draft Environmental Impact Report (“DEIR”). The following commentary represents the Chinatown Stakeholders’ feedback on the Plan based on our collective experience and vision for the Chinatown area.

In general, the Chinatown Stakeholders have interest in property in two areas including Chinatown East and Chinatown West¹. Within the Chinatown East area, the first area of interest is the central part of Chinatown near the intersection of Alpine Street and Broadway. The second area of interest is the northern part of Chinatown closer to the Los Angeles State Historic Park. Within the Chinatown West area, the area of interest is the northern part of Chinatown near the intersection of Yale Street and Bernard Street.

Chinatown History and Background

The changing role of Los Angeles’ Chinatown in relation to the rest of DTLA and the San Gabriel Valley provides a useful background for planning the next 20 years of Chinatown’s development. Once the social, cultural, and economic center of L.A.’s Chinese American community, Chinatown has evolved over the past 50 years. Many Chinese-oriented restaurants, businesses, and community institutions have followed the ethnic Chinese population moving eastward to the San Gabriel Valley, although some continue to locate in Chinatown. As an example, Cathay Bank has since relocated its corporate

¹ Per the DTLA 2040 Plan, Chinatown East is an area approximately bounded by Ord Street, Hill Street, N. Spring Street and LA State Historic Park. Chinatown West is defined as the area approximately bounded by Cesar E. Chavez Avenue, Hill Street, 110 Freeway and Bernard Street.

headquarters to El Monte because most of its customers and employees reside in the San Gabriel Valley. At the same time, adjacent and nearby areas of downtown such as Bunker Hill, South Park, the Arts District, and Little Tokyo have attracted a housing boom generating a downtown residential population that has fueled demand for restaurants, cultural facilities, and other resident-serving services. The downtown housing boom has largely passed Chinatown by. However, filling the vacuum left by the departure of traditional Chinese businesses and organizations, new uses have emerged in Chinatown such as innovative food and retail entrepreneurs, art galleries, and architecture and design businesses. And there are signs that the demand for downtown housing is spilling over into Chinatown. This has led to proposals for new residential projects serving both Chinese and non-Chinese residents.

Many of the Chinatowns in other U.S. cities have stagnated and lost their economic vitality as a result of demographic changes, even in the face of development activity in adjacent or nearby areas. The fundamental challenge for L.A. Chinatown is how to maintain its neighborhood character and serve a wide range of community needs while generating a level of new economic activity that can sustain the community.

A More Balanced Approach to Planning Chinatown's Future

City Planning has an important role in creating a framework for guiding future development in Chinatown. It can deploy planning tools that provide incentives that encourage outcomes that it deems positive or constraints that discourage outcomes that it deems negative. But if the overall planning framework fails to strike the right balance or equilibrium of tools, the desired goals for Chinatown's future will not materialize.

A first step would be to avoid doing harm. Chinatown was largely bypassed by previous waves of new residential development in and around Downtown Los Angeles. In the Cornfield Arroyo Seco Plan ("CASP") adopted in 2013, City Planning attempted to promote infill development in the CASP area but also sought to limit the percentage of residential space in the floor area of new projects. This may have had the unintended effect of discouraging new development even at a time when other parts of DTLA were experiencing a development boom. The only project within the CASP area that has been approved (1457 N. Main St., with 244 live/work units) since adoption of CASP moved forward only as a result of the Central Area Planning Commission granting (in May 2020) an exemption from CASP's limitation of residential uses not exceeding 15 percent of the floor area. The City Council subsequently approved Councilmember Cedillo's motion (Council File No. 13-0078-S2) directing City Planning to review the land use incentives in CASP to determine whether they had the net effect of discouraging the production of mixed-income housing.

In addition to the 1457 N. Main St. project that obtained an exemption from CASP, there are at least two other projects (Buena Vista project, formerly known as Elysian Park Lofts, located above L.A. State Historic Park and the College Station project at the corner of North Spring and College Streets adjacent to the Gold Line station) asked to be excluded from the CASP area in order to avoid CASP restrictions. This additional evidence of other projects that were ready to proceed – but did not want to be covered by the restrictions of CASP – comprise additional evidence that there are components in CASP that were discouraging projects ready to proceed.

While City Planning is conducting its study of CASP's real-world impact on housing production, it would not make sense to adopt overly prescriptive restrictions in another DTLA neighborhood that might also result in unintended consequences discouraging new housing at a time when the city and the region continue to fall further behind current and future housing demand.

Building Height and FAR Limits

In order to enable Chinatown to do its part to fulfill City and Regional housing targets, restore allowable height and FAR.

The Plan proposes reductions in Floor Area Ratio ("FAR") and building height for much of the Chinatown and Chinatown West areas. We believe that these FAR and building height limits represent significant downzoning that is entirely too restrictive and will lead to negative consequences for the future development of Chinatown.

This is especially true for the area generally bounded by Bernard Street, Yale Street, Ord Street, 110 Freeway and Broadway that is proposed to be within the MN1 Form District which would allow a base FAR of 2:1 and maximum height of 3 stories, and which can only be increased up to 6:1 FAR and 5 stories maximum through the Plan's Public Benefits Program.

The Plan's proposed reductions in height and FAR are some of the main tools proposed to preserve Chinatown's neighborhood character. But height and FAR reductions comprise a very blunt and inexact tool that may not achieve the intended goal. The reductions in height and FAR would needlessly inhibit new projects on sites that are not historically or culturally significant.

We are concerned that the base 2:1 FAR and 3-story height restrictions would result in more fast-food restaurants, strip malls, and other buildings accompanied by surface parking lots, which is inconsistent with Chinatown's historical legacy as a walkable, mixed-use neighborhood that respects historic context. The small size of many lots in Chinatown already constrains their development potential. The Plan could easily revert our neighborhood back to the lack of amenities and absence of pedestrian activity of the 1970s.

We firmly believe that the proposed zoning for the Chinatown East and Chinatown West areas should allow a base FAR of 6:1 and height limited only by FAR. Allowing a base FAR of 6:1 and height limited only by FAR would encourage new mixed-use development (including much needed housing as outlined in the Southern California Association of Government's Regional Housing Needs Assessment). This new development would help maintain sufficient density to support the mix of local businesses that make the Chinatown neighborhood function as a pedestrian friendly district where daily errands can be performed without a car.

Parking

Do not count above-ground parking (which may be necessary to make a project economically viable) towards the allowable floor area for projects. Ensure pedestrian orientation by requiring active ground floor uses in projects incorporating above-ground parking.

Although the Plan eliminates minimum parking requirements for the Plan area, above ground parking will be counted towards a project's allowable floor area. This has major implications for the Chinatown area where the Plan proposes an extremely low base FAR of 2:1 in many parts of the neighborhood. Subterranean parking is not always feasible in many cases in an area like Chinatown where excavation can be complicated by geological and/or archaeological factors. In Chinatown, where the Plan greatly limits FAR, above ground parking should not count towards FAR. Counting above ground parking towards FAR, while also greatly limiting FAR in Chinatown, would impede the future development potential in the area by rendering projects infeasible.

We recommend that above-ground parking should not count toward project FAR in the Chinatown area if it is screened and/or adaptable for future reuse and projects include active ground floor uses. This marries good urban design principles with a financially viable means of providing parking.

Design Restrictions

Remove mandating area-wide design requirements.

The Plan would create highly specific design requirements for buildings in the Plan area, including Chinatown. We believe that these design standards are far too prescriptive in the long run will limit creative approaches to design and architecture and put a damper on future development.

Limits on Hotel Rooms

Remove an arbitrary restriction on hotel rooms that could discourage new hotel development in Chinatown.

The Plan arbitrarily limit hotels by their number of rooms, specifically to a maximum 49 rooms in the Chinatown area. We propose that hotel room limits be removed from the Plan since we believe they are antithetical to strengthening DTLA's role as a major visitor destination, including the Chinatown area.

Tenant Size Limitations

Remove arbitrary restriction on new commercial spaces that could deter businesses or community-serving facilities that would benefit the Chinatown community.

The Plan currently proposes various size limitations on commercial establishments throughout DTLA, including a 1,500 square foot limit in parts of Chinatown and a 5,000 square foot limit in other parts of Chinatown. The intent of these limitations seems to be to preserve these areas for small businesses, and/or achieve a small-scale business look and feel. We believe these are blunt policy tools that could negatively impact neighborhoods and exclude potentially desirable businesses. For instance, even the smallest grocery stores typically require 7,500 to 10,000 square feet of space, but these limitations would preclude them, despite a strong need for grocery stores in Chinatown. The tenant size limitations would also preclude banquet style restaurants and other uses such as Chinese goods emporium shopping stores. The proposed tenant size limitations could also preclude desirable uses from locating in Chinatown such as a museum annex, food hall, or creative office or studio space.

Instead of limiting the size of commercial spaces in Chinatown buildings, the Plan should consider other ways to encourage desired outcomes.

Affordable Housing

Incentivize new affordable housing in Chinatown by raising the base FAR for new projects.

Currently as proposed, the Plan would allow mixed income residential projects in the Chinatown area and would not impose an affordable housing requirement in new residential projects unless a project chooses to utilize the Plan's proposed Public Benefits Program to increase allowable height and FAR. We understand that some community groups would like the Plan to implement inclusionary affordable housing requirements to by-right projects in Chinatown prior to utilizing the Public Benefits Program so as to protect low income individuals and families in Chinatown from displacement. While we understand that these community groups' intention is to expand housing affordability and avoid displacement, the outcome of requiring affordable housing in by-right projects in Chinatown prior to the use of the Public Benefits Program is unrealistic and unfeasible.

Additionally, a baseline inclusionary affordable housing requirement for by-right projects, especially in an area like Chinatown where FAR is proposed to be extremely limited, will further exacerbate the issue of financial feasibility of future development in the area. That is to say that the proposed extremely low base FAR in Chinatown, plus a baseline inclusionary affordable housing requirement, would render project costs too expensive with not enough incentive to develop. This will lead to net zero new housing units, both low income and market rate units, and would not help alleviate the housing shortage or affordability crisis facing our city and Chinatown specifically. Accordingly, we firmly believe that the Plan should remain unchanged for Chinatown in terms of allowing market rate housing prior to use of the Plan's Public Benefit Program and only imposing inclusionary affordable housing requirements for projects utilizing the Public Benefits Program and/or seeking development incentives. This, in addition to increasing the allowable base FAR, will ensure the feasibility of producing housing in the future in Chinatown.

COVID-19 Pandemic Impacts

The COVID-19 pandemic has impacted every aspect of our lives and world. While every industry will continue to be impacted, the hospitality, retail and real estate subsectors have been decimated with no clear end in sight. And longer term, subsectors such as office and industrial real estate will be affected by changes in where people work and changes in supply chain; so, surely usage and design of physical spaces will alter as we learn more about the pandemic. Consequently, it would not be in the community's best interest for City Planning to prescribe design and uses based on pre-COVID-19 assumptions.

Conclusion

For the reasons stated above, the Chinatown Stakeholders do not support the Plan as currently proposed. Planned limits on maximum building height and floor area, above ground parking counting as floor area, overly prescriptive design restrictions, hotel room restrictions, tenant size limitations, and potential inclusionary affordable housing requirements without sufficient density to make

projects economically sustainable will severely impair the future growth potential of Chinatown and lead Chinatown into stagnation while nearby Downtown areas flourish.

Because the DTLA 2040 Plan could have such pervasive impact on the physical reality of Chinatown over the next 20 years, it is imperative to further expand City Planning’s outreach efforts to include a wider range of stakeholders including more of the property owners and business owners who provide the jobs, business opportunities, and housing that constitute Chinatown today. We would be happy to help City Planning further extend its Chinatown outreach efforts.

We strongly urge the Los Angeles Department of City Planning to reconsider these proposed zoning regulations in the Chinatown area and instead consider the alternatives outlined in this letter. We appreciate your time and consideration.

Sincerely,

DocuSigned by:
May Chan
60AD96580AD2463
MAY CHAN
Senior Vice President, General Counsel
and Secretary
Cathay Bank

DocuSigned by:
Peter Cheng
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PETER CHENG
Chief Financial Officer
KTKW Limited

DocuSigned by:
Tony Quon
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TONY QUON
President and Board Member
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Co-Managing Member
Summit Western Limited, LLC

cc: Los Angeles City Councilmember Gil Cedillo, 1st District (via email)
Signatories (via email)

Chinatown Stakeholders

Cathay Bank – Cathay Bank, the first Southern California bank founded by Chinese Americans, built its original corporate headquarters on North Broadway, and continues to own and use the building (777 North Broadway; constructed in 1965) as its corporate headquarters and L.A. Chinatown branch office.

KTWK Limited – Owner of Chunsan Plaza shopping center (750 North Hill Street; constructed in the 1960's) that extends from North Broadway to North Hill Street, adjacent to the Cathay Bank property.

L.A. Chinatown Corporation – Owner of the historic New Chinatown Central Plaza established in 1938 (an area approximately bounded by Broadway, Hill Street, Bamboo Lane and College Street) and parking lot located at 419 West College Street .

Moy and Associates - Owner of the buildings located at 946 Yale Street (built in 1961), 736-742 North Broadway (built in 1964), 415 Alpine Street (built in 1977) and 800 North Hill Street (built in 1979).

Summit Western Limited, LLC – Owner of Mandarin Plaza shopping center and Golden Dragon Restaurant property (and adjacent parking lot) located at 970-1000 North Broadway and 950-960 North Broadway, respectively. Both buildings were completed in 1972.



Cherry Yap <cherry.yap@lacity.org>

Fwd: DTLA Community Plan 2040 - Comment Letter DRAFT

Brittany Arceneaux <brittany.arceneaux@lacity.org>

Fri, Dec 4, 2020 at 3:10 PM

To: Cherry Yap <cherry.yap@lacity.org>, Jordan Hallman <jordan.hallman@lacity.org>

----- Forwarded message -----

From: **Brittany Arceneaux** <brittany.arceneaux@lacity.org>

Date: Tue, Sep 22, 2020 at 8:43 AM

Subject: Re: DTLA Community Plan 2040 - Comment Letter DRAFT

To: Mike <mclark.udg@gmail.com>

Cc: Virginia W Wexman <vwexman@uic.edu>, Darrell Clarke <darrclarke@gmail.com>, Francine Oschin <francineoschin@gmail.com>, John Nilsson <dtlanow@gmail.com>, <dennyzone@movela.org>, <yanityak@gmail.com>, Charles Adelman <adelmancharles2@gmail.com>, Clyde Williams <ctwilliams2012@yahoo.com>, Michael Milroy <mmilroy83@yahoo.com>, <bartreed1951@gmail.com>, Barbara Hensleigh <barbarajhensleigh@gmail.com>, <SchankJ@metro.net>, <WalkerG@metro.net>, <ClarkeR@metro.net>, Sharon Lee Koch <slkoch@ix.netcom.com>, Denis Loya, Angeles Chapter <morgan.goodwin@sierraclub.org>, <sierraclub.stevewicke@gmail.com>, Willmcw <willmcw@gmail.com>, Dave Cook <dave.cook@railpropulsion.com>, Nicholas Maricich, Director Planning Policy And Development <nicholas.maricich@lacity.org>, <therailguy@yahoo.com>, <aeaken@nrdc.org>, <crubin@nrdc.org>, <skiles@ucla.edu>, <coby@hpstrat.com>, <rvframpton@hotmail.com>, <mezzohiker@man.com>, Faramarz Nabavi <transit@regenerativecommunities.org>, <jankidwell@sbcglobal.net>, Erin Coleman <erin.coleman@lacity.org>, <fsbaffirm@gmail.com>, Stephanie Liu <stephliu@gmail.com>, Shana Bonstin <shana.bonstin@lacity.org>

Hi Mike,

Thank you for sharing your feedback. Your comments have been received and filed.

Best,
Brittany

On Tue, Sep 22, 2020 at 8:39 AM Mike <mclark.udg@gmail.com> wrote:

Sierra Club
Angeles Chapter

Brittany Arceneaux
Los Angeles Department of City Planning
200 N. Spring St., Room 667
Los Angeles, CA 90012

Ms Arcenenaux,

Our Comments are as follows:

1. Decoupling and Land Use with no minimum Parking Requirement. This is a long sought objective of Sierra Club, and we commend you for this Historic Step.
2. Community Benefits - this is also an excellent concept for inclusion. The history is spotted with unused funds, lack of clarity on where used and cumulative documented results. Another issue is using these funds for benefits already included in the Plan. However, we want to commend for adding active used to the street fronts of above grade Parking. Eliminate on street parking, add bike lanes and sidewalk uses e.g. Outside dining.
3. Add inclusion of Transfer of Development Rights. This has long been used as an important source of Funds e.g. Preservation of Central Library. To have this Vast source of available Funds, and not use them, is a Great Oversight. This is a huge source of funds which could be applied, for example:
 - A. Parks in Park deprived Neighborhoods
 - B. Saving Historic Buildings e.g. Central Library
 - C. New or Revitalized Parks for Community Plans
 - D. Long term source of funds for a Vast increase in the number and diversity of Parks in the City e.g. Along the Los Angeles River, and Mini Parks

E. Anticipated support of Metro Congestion Pricing "Pilot" which will probably focus on Downtown LA and include free transit access as component

The Transfer of Development Rights should be to areas within one quarter mile of Rail Transit Stations

An impressive start.

Mike Clark, Chair, Virginia Wexman, Vice Chair

Sierra Club Angeles Chapter Transportation Committee

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LOS ANGELES
CITY PLANNING

Brittany Arceneaux

She, Her, Hers

City Planner

Los Angeles City Planning

200 N. Spring St., Room 667

Los Angeles, CA 90012

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Please note I am out of the office every other Friday.

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Please note I am out of the office every other Friday.



November 30, 2020

Brittany Arceneaux
City Planner/DTLA 2040 Project Manager
Los Angeles City Planning
200 N. Spring Street, Room 667
Los Angeles, CA 90012

RE: LA FASHION DISTRICT'S COMMENTS ON THE REVISED PUBLIC REVIEW DRAFT DTLA 2040 PLAN

Dear Brittany,

The future of Downtown Los Angeles is exciting! The LA Fashion District Business Improvement District (BID) is a private, non-profit corporation created and maintained by local property owners. We serve the LA Fashion District community—businesses, employees, residents, visitors, and more. Our mission is to help facilitate and provide a **clean, safe, friendly, and prosperous place to work, shop, live and do business**. We serve a 107-block area generally between 7th Street to the north and the Santa Monica 10 Freeway to the south, and from Broadway to the west and Paloma Street to the east.

We reviewed the latest version of the Downtown Community Plan, Zoning Code, and Community Benefits Program (collectively referred to as the *Public Hearing Draft DTLA 2040 Plan*, dated November 2020) and the Draft Environmental Impact Report (dated August 6, 2020). The LA Fashion District appreciates the amount of thoughtful planning, creativity, and focus on positive change that City staff, decision makers, local business and property owners, and the community have given to this planning process over the past six years.

We share the City's vision, as articulated in the draft Plan, to **"...promote a dynamic, healthy, and sustainable Downtown core that is well connected to and supports the City of Los Angeles and the region."** The draft Plan outlines a bold vision for accommodating anticipated growth through 2040 while creating a livable and healthy community for workers, residents, and visitors. The goals and policies described in this Plan focus on continuing Downtown's remarkable renaissance and promoting it as a center of innovation in the public and private realms. The draft Plan also seeks to address many of the challenges facing Downtown and the larger region, such as climate change, housing demand and affordability, and a shifting economy, through strategies that guide thoughtful growth.

We appreciate the City's Planning Department working closely with our District, other Downtown Districts, local business and property owners, and the community to address many of our concerns in the latest draft Plan. This includes easing restrictions on daycares and new schools (e.g., no longer



requiring Conditional Use Permits for these uses within commercial areas), removing above grade parking from Floor Area Ratio (FAR) calculations, and increasing the minimum size of Live/Work units to 750 square feet. These changes provide needed flexibility to ensure property owners and developers can create projects that meet the City's vision for Downtown.

We do, however, have deep concerns regarding several aspects of the policy and zoning approach for the LA Fashion District as currently reflected in the draft Plan. Particularly, the sweeping reductions to base Floor Area Ratios (FARs) for new projects that were made between the August and November 2020 versions of the draft Plan. The approach the City seems to be taking in the current draft Plan is to "restrict" higher density housing projects to only those that provide additional community benefits (which can significantly increase the overall project costs and reduce its feasibility), rather than "promoting" needed housing projects by allowing higher FARs. Given our current housing crisis, ongoing COVID Pandemic, and pending economic downturn, **additional flexibility for business and property owners to provide needed housing is critical** so we can respond to future market shifts and challenges while achieving the City's bold vision for Downtown.

While the LA Fashion District supports most of the revised draft Plan (November 2020), we submit the following **specific concerns and requests for changes to the City for review and consideration**. We strongly feel that these focused changes to the draft Plan are necessary for the City and community to fully realize the vision for the future of our beloved Downtown.

1. REMOVE RESTRICTIONS ON NEW HOUSING

The western edge of the Fashion District between Broadway and Santee Street shares similar zoning with the eastern edge of South Park, which is flexible and allows a range of housing types. However, the Fashion District east of Santee Street is largely zoned for hybrid-industrial and industrial-mixed uses which are more restrictive, with the exception of City Market that sits in the middle of the Fashion District and is zoned for an array of mixed residential and commercial uses. In general, the City's proposed zoning approach for the Fashion District is to allow a wide mix of uses in the western portion and gradually increase more restrictive industrial-focused zoning eastward.

Amid our current housing crisis, precluding housing in some areas and limiting housing to Live/Work or PSH units in other areas is **counterproductive and contrary to our common goal of making Downtown the place for housing people at all income levels**. While recent updates to the draft Plan would technically allow more types of housing in the Fashion District, there is a requirement that projects with housing be coupled with a minimum of 1.0 FAR of office or light industrial space, unless they are Live/Work. As there is very little demand for new office or light industrial uses in these areas, and with the uncertainties around these uses resulting from COVID, we believe the code as written will have the effect of limiting development in hybrid industrial areas to Live/Work.

We believe the current approach as outlined in the Plan will result in exclusionary and economically stratified growth since Live/Work units are typically more expensive to build than traditional housing units. This more restrictive approach to housing will likely result in a less integrated or inclusive community. Additionally, as the fashion industry undergoes major changes and as employment shrinks, the future economic vitality of the LA Fashion District neighborhood is dependent on welcoming a variety of new residents.



Request: *The LA Fashion District requests the City to consider allowing more flexibility and a greater range of housing types in the Plan. Specifically, we request the City to adopt an amendment to the Framework Element in tandem with DTLA 2040, which will allow for far greater flexibility to plan hybrid industrial areas as mixed-use neighborhoods with a diversity of housing types. In lieu of amending the Framework Element, we believe that there could still be more flexibility for different housing types in Hybrid-Industrial areas. In the absence of an amendment to the Framework Element, we recommend that for projects that include more conventional multi-family housing, set the commercial space requirement as 10 percent of the building area, which will create fairer rules for all projects than the current requirement that is based on lot size, especially those that don't use a site's full FAR.*

2. INCREASE MINIMUM FLOOR AREA RATIOS

We are very concerned with the recent changes to the DTLA 2040 Plan whereby base Floor Area Ratios (FAR) in the Fashion District have been dramatically reduced. The changes shown in the November 2020 Public Hearing Draft are substantial: from 7.0 and 6.0 to 3.0 -- **a 60 percent and 50 percent base FAR decrease respectively within the Fashion District.** While we understand the intent of these changes is to ideally increase usage of the Community Benefits System, we are very concerned that this is too dramatic of a change that tips the scales of project economics to be economically infeasible. These are walkable, transit-rich areas where we want to promote growth, but the reductions in base FAR create a de facto scenario where the FAR is too low to build a viable project under the base FAR allowances on the one hand while simultaneously placing a large financial onus on projects to obtain bonus FAR via the Community Benefits System.

Because the Level 1 affordable housing FAR bonus is 35 percent of the base FAR, the Level 1 bonus is necessarily reduced as well (for example, a 35 percent bonus on 6.0 base FAR is an additional 2.1 FAR, but is only an additional 0.7 FAR on a 2.0 base FAR). The October 2019 financial feasibility analysis of the Community Benefits System prepared by HR&A Advisors for the City specifically highlights this issue on a large swath of the Fashion District leading into the Historic Core, where most of these FAR changes would apply, "are unlikely to support larger high-rise developments until market performance matures further, and thus are not able to support public benefits to the same degree as Place Types with strong submarkets."

Request: *The LA Fashion District requests the City to firmly maintain base Floor Area Ratios (FARs) as proposed in the August 2020 draft DTLA 2040 Plan. A failure to do so would diminish the development feasibility of new affordable and market-rate housing projects and hinder the City's ability to implement the vision as outlined in the DTLA 2040 Plan.*



3. ALLOW HOTELS IN THE IX2 USE DISTRICT

We feel that new hotels will support economic growth and help create more urban energy in the Fashion District. We are excited to see the City remove the limitation on new hotels and motels in the IX2 Use District. Limiting hotels does not support the economic goals for Downtown or the vision to transform the area into a vibrant, 24/7, active urban environment. Hotels are an important asset for Downtown because they support tourism, increase the local tax base, and promote positive “after hour” activity and energy.

Request: *The LA Fashion District requests the City to allow new or expanded hotels within the IX2 Use District without restrictions on the total number of hotel room keys.*

4. INCREASE BUILDING HEIGHTS

The DTLA 2040 Plan as proposed would impose base and bonus (with use of the Community Benefits Program) maximum building height limits in many parts of the LA Fashion District, including the new DM4 Form District. We have concerns with the proposed building height limits, particularly in areas near transit stations as we are investing hundreds of billions of dollars in building out our transit system and as these are exactly the areas we need our city to grow to become less car-dependent and more affordable and sustainable. It is also critical to demonstrate our commitment to growth in areas near transit as we compete for infrastructure funding from the State and Federal governments.

Our understanding is that height limits were proposed in these areas to preserve their character and historical context. We treasure Downtown’s historic neighborhoods, communities and buildings, and we want to see them continue to play a vital part of its future. Yet, blanket height limits are not an appropriate tool for neighborhood preservation. These districts and buildings should be considered through the appropriate historic preservation and landmarking processes, which is much more targeted and would not needlessly inhibit growth on sites that might not have historic or cultural significance. Additionally, we believe that context-sensitive growth can occur with the use of urban design tools like setbacks and street frontage requirements.

Furthermore, in many cases, the proposed building height limits are not aligned with the economic realities of development and the constraints of relative construction materials. For instance, mixed-use buildings can generally be built with wood frame over a concrete parking and retail podium to a maximum of eight stories under the building code, and buildings made of concrete and steel can be taller but typically need to be a minimum of 20 stories to be financially feasible and justify the additional costs of the more expensive labor and building materials. Some of the proposed base and bonus height limits in areas of Downtown are 12 stories and 15 stories, respectively, and 15 and 18 stories, respectively. With a few exceptions for large sites that can accommodate a lot of building capacity in terms of width, most mixed-use developments will not even be able to build to the base height limits of 12 and 15 stories, and these height limits will act like seven- and eight-story limits in reality.



The draft Plan also creates scenarios where height limits preclude maximizing a site's allowable FAR, like the MLN1 Form District which allows 6.0 FAR but limits buildings to a maximum of five stories. This means that the growth envisioned by the plan may not actually occur and the resulting community benefits will also not be delivered.

Request: *The LA Fashion District requests the City to remove building height maximums within the DM4 Form District and instead utilize FAR, setback, and frontage requirements to govern building height and massing, and that historic communities be considered instead through the established historic preservation processes. This approach will promote context-sensitive growth and density near transit, respect neighborhood character and appropriately preserve historical assets in a way that reflects the economic realities of development.*

5. ENSURE COVID PANDEMIC RELATED FLEXIBILITY

The COVID pandemic has dramatically affected local manufacturing businesses, offices, stores, and restaurants. Projects and uses that were previously financially viable have greatly diminished in value. We are hopeful that Downtown's economic prospects will strengthen as restrictions are lifted, successful vaccines are obtained and made widely available, and perceptions of urban life improve. However, it may be some time before circumstances get better, and the draft Plan must be sensitive to this economically vulnerable context if we are to continue to see new growth and community benefits in Downtown. While we do not know where the future will take us when it comes to permanent social distancing, we encourage the City to permit and allow the quick implementation of outdoor shopping (on sidewalks), street closures for outdoor markets and dining, and other temporary spaces within the public realm to help private companies.

Request: *The LA Fashion District requests the City streamline temporary street closures to allow outdoor markets, shopping/retail, and dining spaces. These spaces should be encouraged even if they will have temporary impacts on traffic or transit operations. And these spaces shall be compliant with all Los Angeles County health requirements around social gathering and social distancing.*

6. ALLOW MARKET RATE HOUSING IN THE CENTRAL CITY EAST AREA

The current draft Plan prohibits market rate housing in a specific part of Downtown between 5th and 7th Streets and San Pedro Street and Central Avenue. The intent of this provision is likely to preserve existing affordable housing and single room occupancy hotels, but it is unnecessary given covenants, the Residential Hotel Conversion and Demolition Ordinance, and the Wiggins Settlement. This area contains the largest concentration of unsheltered homeless people in the nation and is in an area of extreme poverty and housing need. Banning market rate housing would further concentrate poverty in this area of Downtown and run counter to stated draft Plan goals of inclusive and diverse neighborhoods.

Imposing this provision would only freeze the current conditions and further a failed policy of containment. We believe this policy also directly conflicts with the Federal mandate to Affirmatively Further Fair Housing (AFFH). Affordable housing is an important part of DTLA 2040, and it should be integrated throughout the plan area. We strongly support housing opportunities for all incomes across



Downtown as the primary tool to address the complicated and extensive challenges of homelessness and poverty in our city.

It is important to recognize that the Community Plan, which is a land use and zoning plan, cannot alone address the challenges of this area. Truly meeting the needs of this area requires a much broader effort that involves mental health, workforce development and social services, which will take coordination from multiple departments and organizations, which we support and encourage. As such, we echo the Central City East Association’s “The Voices of Central City East” report (October 16, 2020) and share their concerns and long-term vision for the area.

***Request:** The LA Fashion District requests the City to remove the ban on market rate housing from 5th to 7th Streets and San Pedro Street to Central Avenue, and instead urge City Planning to consider ways the area’s zoning can be tailored to produce mixed-income developments and socioeconomic integration and inclusion.*

7. ADOPT DEIR ALTERNATIVE #3 TO ADDRESS THE ONGOING HOUSING CRISIS AND SCAG RHNA MANDATES

As the Southern California Association of Governments (SCAG) finalizes the 6th Cycle Regional Housing Needs Assessment (RHNA), it is clear that the City of Los Angeles will be responsible for delivering an incredible amount of new housing by the order of more than 455,000 units between 2021 to 2029. The magnitude of this housing target cannot be overstated – in the City’s history, only 420,000 units were built at the peak of housing production over the course of 20 years between 1960 to 1980. At the same time, homelessness in the city continues to increase, growing by over 14 percent last year reaching more than 41,000 unhoused people living in the city, 16 percent of whom are in Downtown, which is the largest concentrated street homeless population in the nation. While this housing goal stands out as seemingly astronomical, in reality it reflects a persistent housing and homelessness crisis that has long been one of the major issues facing the city and region. Unfortunately, this issue has historically been left largely unaddressed by solutions of the necessary scale.

The DTLA 2040 Plan notes that SCAG projects that Downtown will make up over 20 percent of the city’s growth over the next two decades, which is a significant share of the City’s RHNA target and means that **at least 12,000 units per year on average will need to be built in Downtown over the next eight years alone**. As the region’s transit and job hub, Downtown must play an outsized role in meeting this ambitious goal, requiring DTLA 2040 to provide substantial capacity for new housing growth at all income levels. Alternative 3 of the DEIR is the superior alternative as it would enable the greatest growth and housing production.

The Draft Environmental Impact Report (DEIR) for this plan was contemplated prior to the COVID-19 pandemic and resulting economic depression. We believe much of the plan as proposed is a great improvement to DTLA’s land use and planning framework and we are appreciative of City Planning’s outreach and engagement. We recognize that DTLA 2040 is an enormous undertaking for City Planning as it will be the first community plan to implement the new code. We appreciate the significant resources dedicated to the plan’s development. We are pleased that DTLA continues to be the City’s laboratory for new ideas. DTLA 2040 must go even farther to promote a bold and exciting future for our city center.



Request: *The LA Fashion District requests the City adopt DEIR Alternative 3 as the preferred option to allow for the greatest development capacity and flexibility for Downtown. Adoption of Alternative 3 allows for the greatest housing and development capacity and flexibility to spur Downtown’s recovery and best positions the heart our city for private and public investment.*

8. MAKE THE COMMUNITY BENEFITS PROGRAM MORE FINANCIALLY FEASIBLE

We are concerned about specific provisions that impact the financial feasibility of utilizing the bonus FAR, particularly for high-rise projects at this immensely economically challenging time for Downtown. The economic fallout from the pandemic presents major issues for building in Downtown, but it is important to note that the Community Benefits System, primarily the affordable housing bonus provisions, poses challenges for the financial feasibility of development even in strong economic conditions. Level 1 of the Community Benefits Program is essentially aligned with the City’s Affordable Housing Density Bonus and Tier 1 of the Transit Oriented Communities (TOC) Program in terms of the percentage of affordable housing required by income level (with the exception of options for Deeply Low and Moderate Income housing under the draft Plan). However, the FAR bonus for providing affordable housing is 35 percent, which is at the lowest end of the City’s affordable housing incentive programs in alignment with the Density Bonus.

Request: *The LA Fashion District requests the City change the Level 1 of the DTLA 2040 Community Benefits Program provide a more substantial FAR increase to support the feasibility of high-rise construction. We also believe that the ability to contribute an in-lieu payment or partner with an affordable housing provider to provide affordable units off-site are good, important features of the Community Benefits System that must be maintained as they offer necessary flexibility.*

Thank you for your consideration on these important items. We look forward to further discussions and refinement of the visionary DTLA 2040 Plan.

Rena Masten Leddy
Executive Director
www.fashiondistrict.org



Cherry Yap <cherry.yap@lacity.org>

Fwd: Comment on zoning code: Tattoo studio use

Brittany Arceneaux <brittany.arceneaux@lacity.org>

Fri, Dec 4, 2020 at 3:17 PM

To: Jordan Hallman <jordan.hallman@lacity.org>, Cherry Yap <cherry.yap@lacity.org>

----- Forwarded message -----

From: **Brittany Arceneaux** <brittany.arceneaux@lacity.org>

Date: Mon, Nov 2, 2020 at 9:59 AM

Subject: Re: Comment on zoning code: Tattoo studio use

To: Rob Redcay <Rob@joinpact.org>

Cc: Craig Weber <craig.weber@lacity.org>, Estineh Mailian <estineh.mailian@lacity.org>, Rob Redcay <rob@junejungart.com>

Hi Rob,

Thank you for your thoughtful feedback. Your comment has been received and filed. I believe that tattoo studios will now fall under the "personal service" category. To view the proposed use regulations for personal service in Downtown please review [this document](#).

Best,
Brittany



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On Thu, Oct 29, 2020 at 6:46 PM Rob Redcay <Rob@joinpact.org> wrote:

Hello Craig and Brittany,

(CC Estineh for context of our existing conversation on this topic)

I have heard that you are working on a new zoning code starting with DTLA and eventually for all communities in the city of LA. I also read that you are accepting public comments. Thank you for your hardwork and for hearing me out.

My comment is specifically about "Tattoo studio" as a permitted use. **I strongly suggest that you consider permitting tattoo studios in all zones which permit similar businesses like hair, barber, and nails.** The current Use List Memo permits tattooing only in C2, C5, CM, M1, M2, M3.

By comparison, here are the zones which permit similar businesses:

Barber Shop – RAS3, RAS4, C1, C1.5, C2, C4, C5, CM, M1, M2, M3

Hair Dresser – RAS3, RAS4, C1, C1.5, C2, C4, C5, CM, M1, M2, M3

Beauty Shop or Parlor – RAS3, RAS4, C1, C1.5, C2, C4, C5, CM, M1, M2, M3

Cosmetological Establishment – RAS3, RAS4, C1, C1.5, C2, C4, C5, CM, M1, M2, M3

Manicure Parlor – RAS3, RAS4, C1, C1.5, C2, C4, C5, CM, M1, M2, M3

Massage Parlor, licensed massage therapist, bodyworker, bodywork therapist, or massage and bodywork therapist
C2, C4, C5, CM, M1, M2, M3

As you can see, use for tattoo studios is the most restrictive of all of these. With the exception of massage parlors, the other businesses are permitted virtually everywhere. To anyone born in the first 80 years of the 20th century, this might not seem all that surprising. For many decades, tattooing was associated with counterculture and even criminal subcultures and some city's laws continue to reflect that history. While LA's laws are more permissive, this uneven treatment when compared to similar businesses shows the lasting effect of that history.

It is high time to reconsider this. Did you know that 30% of Americans and over 50% of Millennials in the US have tattoos? If you yourselves don't have tattoos, surely you have close friends and family who do. Tattoos are completely mainstream and most new tattoo studios seek to capture the growing high-end segment of the tattoo industry. If you

visit any of LA's recently-opened tattoo shops, you'll likely find it more comparable to an art gallery or upscale salon than the "parlors" of yesteryear. There is no greater chance that a tattoo shop will be "blighting" when compared to a barber shop or the other comparable businesses I've listed above.

Some may fear that tattoo shops have additional concerns around hazardous waste but this is simply not true. By state and county regulation, all hazardous materials (sharps) are disposed of by medical waste companies. The rest of a shop's waste is comparable to household waste.

In your work on the new code, please consider permitting tattoo studios in a way consistent with other, similar businesses. Tattooing is very popular in Los Angeles and is a growing industry (Nearly \$2B in the US and growing 10% every year 2012 - 2017). Tattooers generally have artists' sensibilities and can brighten and invigorate areas that might otherwise not attract new business.

I am glad to answer any more questions and talk in more detail on any of these points. Please reach out for any reason. My cell number is below.

As a final aside, I'd like to mention that the current Use List Memo seems to be in error by prohibiting Tattoo Studios C4 (given their permission in C2). While C4 does explicitly prohibit several uses (arcades, gyms, etc), tattoo studios are not similar to any and there is no reasonable explanation for the prohibition in C4. There are dozens of tattoo shops in LA in C4 zones and this ambiguity puts them at risk and makes it difficult for shop owners and others in the industry to do business in this city. I would like to formally request for that Memo to be updated and am waiting for direction from Estineh on how to do so. If any of you know how I can do that, please share. In the meantime, I hope we can iron it out in future iterations of the zoning code that your team is working on.

Best,
Rob Redcay
(917) 520-2959
Co-owner of June Jung Art Tattoo Studio
Volunteer staff at [Professional Association of California Tattooers](#)

--
[Rob Redcay](#)
[Professional Association of California Tattooers](#)
www.joinpact.org



Brittany Arceneaux
She, Her, Hers
City Planner
Los Angeles City Planning
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Please note I am out of the office every other Friday.



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Please note I am out of the office every other Friday.

November 23, 2020

Shana M. Bonstin, Deputy Director,
Community Planning Bureau
Los Angeles Department of City Planning
200 North Spring Street
Los Angeles, California 90012

RE: Draft Environmental Impact Report (EIR): Downtown Community Plan Update/New Zoning Code for Downtown Community Plan; DLANC Comments as of November 23, 2020

Dear Ms Bonstin:

At a public meeting on November 23, 2020, the Board of Directors of the Downtown Los Angeles Neighborhood Council (“DLANC”) voted to provide the following comments below pursuant to the motion passed on November 16, 2020, by DLANC’s Planning & Land Use Committee (“PLUC”).

Background: DLANC previously provided a letter to Los Angeles Department of City Planning dated January 29, 2019 including comments to the Draft 2040 Plan. DLANC reviewed the revised Downtown Community Plan and other documents included in the DEIR. This letter includes some comments carried through from the previous letter that have not been addressed as well as additional comments on the revised Community Plan and other documents in the DEIR for your consideration.

COMMENT 1: Adoption of Downtown Community Plan

Section 2.2 of the DEIR states that the primary issue to be resolved through the planning and environmental review process for the Proposed Project is whether the City should adopt the updated Downtown Plan and New Zoning Code to replace the existing community plans and code.

DLANC conditionally supports the adoption and implementation of the Downtown Community Plan as revised and included in the DEIR. DLANC support is conditioned on incorporation of the following stipulations and comments below for the plan. DLANC support may include other items of stipulation and additional comments as the Community Plan process progresses and the Final EIR document is modified.

COMMENT 2: Preferred Alternative

The DLANC Board supports the adoption of Alternative 3: Increased Development Potential. Alternative 3 would result in the highest level of development in all areas of Downtown Los Angeles to meet all the basic project objectives, which are in line with the DLANC Vision

Document. Simply put, Alternative 3 is the most in line with the guiding policies of the DLANC Vision Document of all Alternatives.

COMMENT 3: Existing Regional Parks or Recreation Facilities

The Draft EIR identifies an impact of Significant and unavoidable. The DLANC Board requests the Downtown Plan designate more land area for Parks and Open Space to accommodate for the anticipated growth proposed in this plan.

COMMENT 4: The DLANC Board supports level 1 of the community benefits program provision for affordable housing in the DTLA 2040 plan, which requires the option for on-site, in-lieu fee, off-site and off-site acquisitions, all located in Downtown LA.

COMMENT 5: The DLANC Board rejects the DTLA2040 plan's proposed exclusion of market rate housing and rejects the requirement of 100% affordable housing in any one specific area/land use designation in downtown.

COMMENT 6: The DLANC Board rejects any required minimum or average unit size in any area within Downtown.

COMMENT 7: The DLANC Board requests traditional residential dwelling units be allowed in all areas in addition to those currently shown as being restricted to live-work only units in the Industrial-Mixed districts.

COMMENT 8: The DLANC Board requests a proposal that allows any area within ¼ mile radius of an existing or planned Metro station, including the location at 7th and Alameda, to have the "Transit Core" FAR and land use designation. The historic Broadway corridor south of 3rd Street should be exempt from this request.

COMMENT 9: The DLANC Board rejects the inclusion of all Parking Requirements at any location in Downtown.

COMMENT 10: The DLANC Board request to reconsider the toy district zoning to remove height restrictions.

COMMENT 11: The DLANC Board request to expand the Traditional Core and Transit Core areas east to continue down Maple past 9th street down the 10 Freeway to be consistent with the Federal Opportunity zone boundary and for consistency in the neighborhood.

Please provide a digital copy of your responses to these comments and any decisions on any actions taken based on these comments in a letter by mail to planning@dlanc.com. Thank you in advance for your consideration of the comments presented in this Letter.

Very truly yours,



Patricia Berman
DLANC President

Very truly yours,



Ryan Afari
DLANC Planning & Land Use Committee Chair

CC: Kevin de Leon (Council District 14) (via email)
Gil Cedillo (Council District 1) (via email)
Curren Price (Council District 9) (via email)
Cecilia Lamas (Central Planning Commission) (via email)



Cherry Yap <cherry.yap@lacity.org>

Fwd: Public Comment in Response to the DTLA 2040 Community Plan Draft -

Brittany Arceneaux <brittany.arceneaux@lacity.org>

Mon, Dec 7, 2020 at 12:08 PM

To: Cherry Yap <cherry.yap@lacity.org>, Jordan Hallman <jordan.hallman@lacity.org>

----- Forwarded message -----

From: **Brittany Arceneaux** <brittany.arceneaux@lacity.org>

Date: Wed, Dec 2, 2020 at 3:42 PM

Subject: Re: Public Comment in Response to the DTLA 2040 Community Plan Draft -

To: Laurie Sale <scsbuildingfund@gmail.com>

Cc: Craig Weber <craig.weber@lacity.org>

Hi Laurie,

Thank you so much for your thoughtful feedback. Your comments have been received and filed.

Best,
Brittany

On Wed, Dec 2, 2020 at 3:25 PM Laurie Sale <scsbuildingfund@gmail.com> wrote:

SCS BUILDING FUND, LLC**1455 ORIOLE DRIVE****LOS ANGELES, CA 90069****(310)365-5123**

December 2, 2020

Dear Brittany and Craig,

The future of Downtown Los Angeles is exciting!

My family is a third-generation property owner in DTLA at: 809, 811, 816, 818-822 AND [824 S. Los Angeles Street](#), for over 80 years. As a longtime stakeholder in our downtown community, we share the City's vision, as articulated in the draft Plan, to **"...promote a dynamic, healthy, and sustainable Downtown core that is well connected to and supports the City of Los Angeles and the region."**

We appreciate the City's Planning Department working closely with our downtown Districts, local business and property owners, and the community to address many of our concerns in the latest

draft Plan.

While we support most of the revised draft Plan (November 2020), we want to submit the following **specific concerns and requests for changes to the City for review and consideration:**

- Remove restrictions on new housing
- Increase minimum floor area ratios
- Allow hotels in the IX2 Use District
- Increase building heights
- Ensure COVID pandemic related flexibility
- Allow market rate housing in the Central City East area
- Adopt DEIR Alternative #3 to address the ongoing housing crisis and SCAH RHNA mandates
- Make the Community Benefits Program more financially feasible

Each of these items is further explained and expanded upon in the LA Fashion District's Response Letter for you to reference.

Thank you for your consideration on these important items. We look forward to further refinements of the visionary DTLA 2040 Plan.

Respectfully,

Laurie Sale

SCS BUILDING FUND, LLC

LAURIE SALE

310-365-5123

"When you see something that is not right, not fair, not just, you have to speak up.

You have to say something; you have to do something." John Lewis

--

Brittany Arceneaux
She, Her, Hers



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Please note I am out of the office every other Friday.

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SOUTHERN CALIFORNIA FLOWER GROWERS INC.

December 04, 2020

Brittany Arceneaux
City Planner/DTLA 2040 Project Manager
Los Angeles City Planning
200 N. Spring Street, Room 667
Los Angeles, CA 90012

Dear Ms. Arceneaux,

First off, thank you very much for all the work you and your staff have put into the DTLA 2040 Plan. I am sure it has been no easy task given all the different entities and stakeholders advocating for one issue or another.

To give you some background, our wholesale flower business (The SoCal Flower Market) has been in the City of Los Angeles for 108 years. I believe we are one of the oldest institutions still doing business in the City. Recently, the City granted us the zoning rights to build a mixed use project which would not only house a flower market but allow us to add residential, office and new F&B to our property. Since the wholesale flower business has dramatically shifted over the years (i.e., buyers bypassing our markets), we needed to reinvent ourselves and stay competitive in this ever-changing technological world. We hope to break ground in 2022 and our project has been referred to by many city officials as the "Gold Standard" or the model example of what is possible in our outdated industrial district. We hope to live up to such a high standard.

That being said, there are a couple of areas where modification to the Plan would enable our district to not only thrive but be a great example for other metropolitan cities to follow (similar to New York's meat-packing district).

1. Allow market rate housing in the Central City East area. The tragedies we see in Skid Row are enormous and complicated and we have witnessed it firsthand for decades. One thing is certain – centralizing the needed housing and services in one specific area has not worked. To go even further by designating a large area as affordable housing will only lead to further tragedy. We believe decentralizing is the key as it will make it harder for the criminal element to (i) prey upon the vulnerable and (ii) allow for better conditions to help people rather than handcuff them to one specific area. By forcing the vulnerable to live in an area where the criminal element (i.e., drug dealers, pimps/prostitution, etc.) are allowed to centralize and flourish in one zone is a disaster as we have witnessed firsthand on our own street.
2. Remove restrictions on new housing and increase floor area ratios. Our city is in desperate need of less expensive housing, especially in the mid-range pricing. Removing restrictions will encourage construction of new units and drive down prices. Our project is a good example – since we are not South Park or the Arts District, our rent forecasts are in the \$2,000 to \$2,500 per unit range. A price which is almost non-existent in DTLA. And because we were not restricted by FAR or specific housing types, we are allowed to build enough units to achieve financial feasibility and keep our rents in the target range dictated by our location.

Thank you for your consideration and we look forward to further refinements of the visionary DTLA 2040 Plan.

Sincerely,



Scott Yamabe
CEO

SHIMODA DESIGN GROUP
ARCHITECTURE

Los Angeles City Planning
Attn: Brittany Arceneaux, City Planner
RE: Remarks to the Draft of the Downtown Community Plan Update
07 December 2020

Dear Brittany,

As an architect who has been building within the City of Los Angeles for 30 years, I would like to express my concerns about the current draft of the Downtown Community Plan Update and the Code recommendations for Recode LA 2040. The website states the following:

"Several years ago, City Planning set out to create a modern and efficient zoning system for Los Angeles. The proposed approach aims to establish a new Zoning Code that is more responsive to the needs of Los Angeles's neighborhoods, in addition to being easier to use."

These are noble goals, but the current draft of the code does not show itself to be more responsive to local needs, nor is it easier to use.

The current draft encourages specific distinction between neighborhoods and their current or perceived cultural affiliations. This distinction freezes a location in time and prohibits the future evolution of these areas. This will ultimately result in the perpetuation of a fake architectural representation to gain city approval. The creation of specific development standards in each district will only create confusion and contradiction which will lead to the increased reliance on interpretation from the governing bodies. A greater reliance on interpretation and conversation between differing jurisdictions will slow decisions and make approval times longer. A current example is where balconies and non-flat roof lines are prohibited in the Arts District because it is deemed not reflective of the industrial area. This is nonsensical, and is not reflective of the current building stock in the district. To make something like balconies a discussion topic is a waste of everyone's time. Balconies in residential projects are common design element and meet a market demand, to put restrictions on such a thing will stop development. Furthermore, prescribing roof lines limits function and architectural expression, and should not be dictated by code.

The current drafts for use and density are too specific and all point to increased costs for development to occur. The Hybrid Industrial District in particular has too many development standards that will ultimately put a cap on interest in creating housing in this area because the minimum unit size, material and physical form requirements will be too expensive to implement. As a result, development will occur in other cities with more favorable and realistic conditions. The draft also points to recommended programmatic uses for the interior of the building. No part of a planning code should have jurisdiction in what happens on the interior organization or design of a structure.

All great cities in the world have evolved through changing economic and cultural demands brought on over the course of time. Planned communities have never resulted in diverse and compelling solutions. A form-based code only creates conditions of conformance and sameness, not diversity and vibrance. Implementing code to "protect" a neighborhood that was borne from a lack of those very limitations is at odds with the march of civilization.

We strongly believe that the current draft needs further study and input from the professional design and development community prior to adoption. The draft analysis of the Downtown, Arts District, Little Tokyo, and Chinatown districts in particular need to be reconsidered and not be defined by transitory cultural associations, a form-based code or by prescribed use requirements that will not evolve over time to reflect the community that it serves.

Los Angeles deserves a code that allows for change and evolution and does not preclude certain economic realities needed for growth.

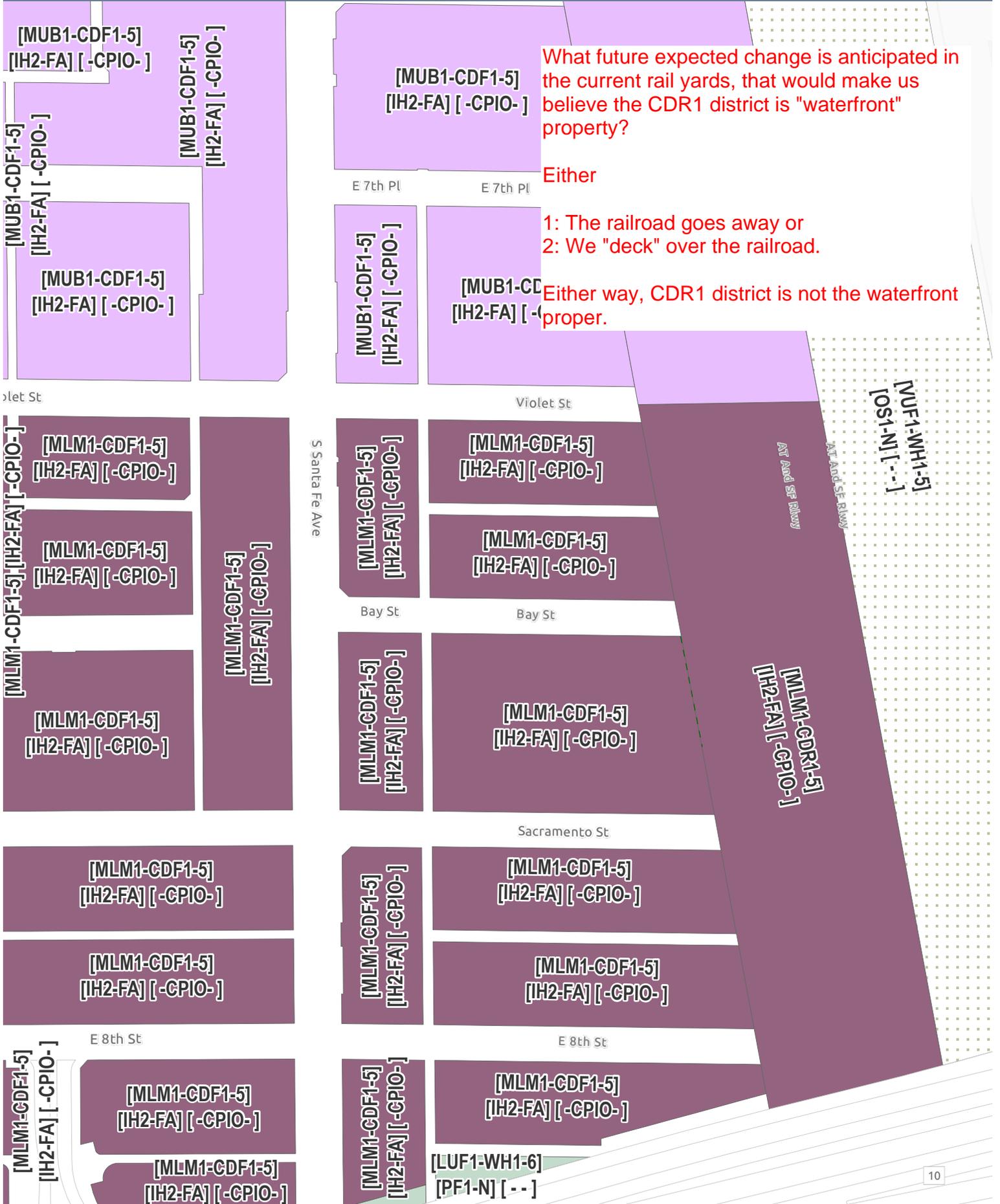
Sincerely,



Joey Shimoda FAIA, FIIDA

cc: Craig Weber craig.weber@lacity.org Shana Michele Murphy Bonstin shana.bonstin@lacity.com
Will Wright will@aialosangeles.org

Attachments: PDF markup: specific comments on the draft code.



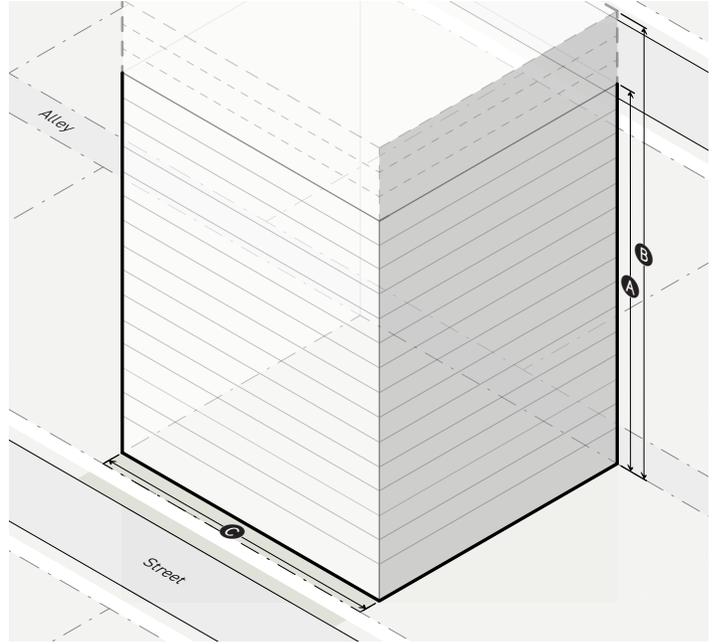
SEC. 2B.11.1. **MEDIUM-LIMITED-MEDIUM 1 (MLM1)**

1. Lot Parameters



LOT SIZE	2C.1.
Lot area (min)	n/a
A Lot width (min)	25'
COVERAGE	2C.2.
B Building coverage (max)	90%
Building setbacks	
C Primary street (min)	see Frontage
Side street (min)	see Frontage
D Side (min)	0'
Rear (min)	0'
E Alley (min)	0'
Special lot line (min)	see Frontage
AMENITY	2C.3.
F Lot amenity space (min)	15%
Residential amenity space (min)	10%

2. Bulk and Mass

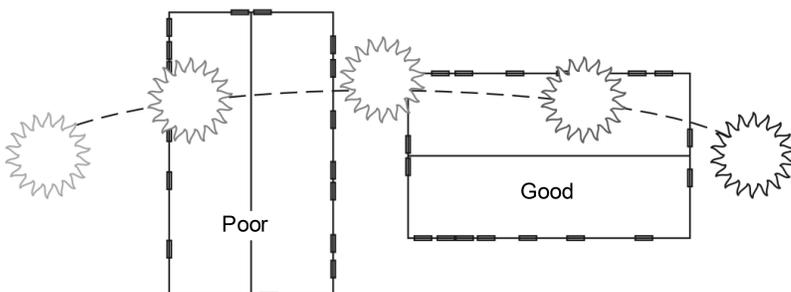


FAR & HEIGHT	2C.4.
Base FAR (max)	1.5
A Base height in stories (max)	15
Bonus FAR (max)	4.5
B Bonus height in stories (max)	18
BUILDING MASS	2C.6.
C Building width (max)	160'
Building break (min)	15'

Any exception to width? What if lot is far wider than 160' ? Current building on our site is 200' long at the street with no breaks or steps.

A typical office building is 200' or more in length, by 120' or so in depth. This is a market driven shape that is desired by most large office tenants.

Most importantly, making buildings wider along the east west direction and shallower north to south improves the natural lighting and environmental performance of the building. We hope that there is room within this draft to accommodate the most fundamental of sustainable design rules.



SEC. 3B.9.3. DAYLIGHT FACTORY (CDF1)

A. Intent

The Industrial 1/Daylight Factory Character Frontage contains metrics and standards aimed at creating infill development that is both contextual and compatible with the historic building stock typical of industrial areas of Los Angeles that were developed in the early 20th century. Utilizing the technology of the day, such as using reinforced concrete for building framing, Daylight Factories were built to accommodate expansive, open floor plans so as to maximize the space available for production. The advancements in building framing meant that exterior walls no longer had to be load-bearing, which allowed for a far greater number of windows to be installed between floors, thus maximizing the amount of light and air that could enter the production floors.

Principally characterized by high levels of transparency and an emphasis on horizontal expression rather than vertical, Daylight Factories also often feature tall floor heights, flat roofs with parapets, and brick and masonry façade materials. Windows are often recessed substantially from the building façade, and large windows are commonly broken up into symmetrical lite patterns.

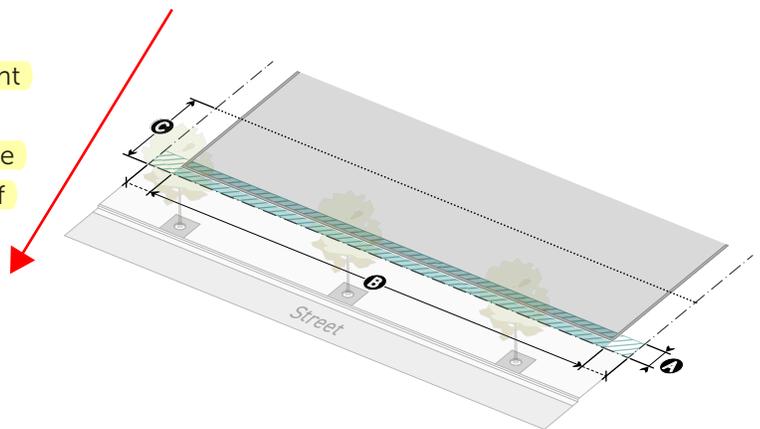
In order to shape and influence new development to be more harmonious with and respectful of proximate historic industrial development, the Daylight Factory Character Frontage incorporates common Daylight Factory design features into the requirements for new development. By requiring new construction to feature similar façade materials, roof forms, floor heights, and window designs to that of what is typical of traditional Daylight Factory design, the Daylight Factory Character Frontage aims to create infill that respects and responds to the surrounding historical industrial building stock.

The regulation of design features is not intended to create buildings that imitate or aim to replicate historic buildings, but rather ensure that new development maintains the general character of early 20th century industrial neighborhoods while still allowing for creativity and modern construction methods.

Why are explicit architectural features being prescribed in this revised code? This is going to create new buildings that all appear more like each other, rather than the existing context, which was built without aesthetic restrictions.

B. Lot

Why is there a strict requirement on vertical bands every 20 to 30 feet?



	Primary	Side
BUILD-TO	Sec. 3D.2.	
Applicable stories (min)	3	3
A Build-to range (min/max)	0'/5'	0'/10'
B Build-to width (min)	90%	70%
Pedestrian amenity modification (max)	30%	30%
PARKING	Sec. 3D.3.	
C Street setback (min)	20'	5'
FRONT YARD LANDSCAPE	Sec. 3D.4.	
Planted area (min)	30%	30%
Privacy Screen allowed:	A1	A1

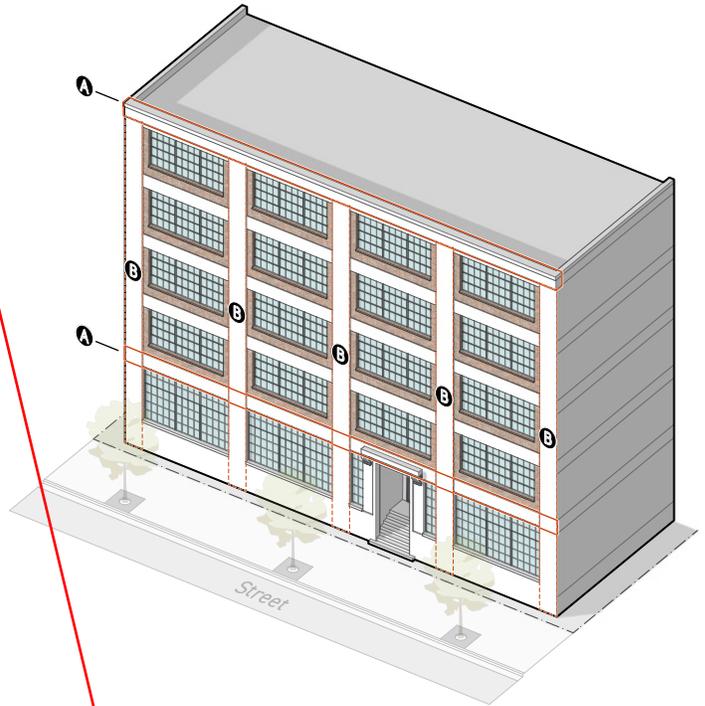
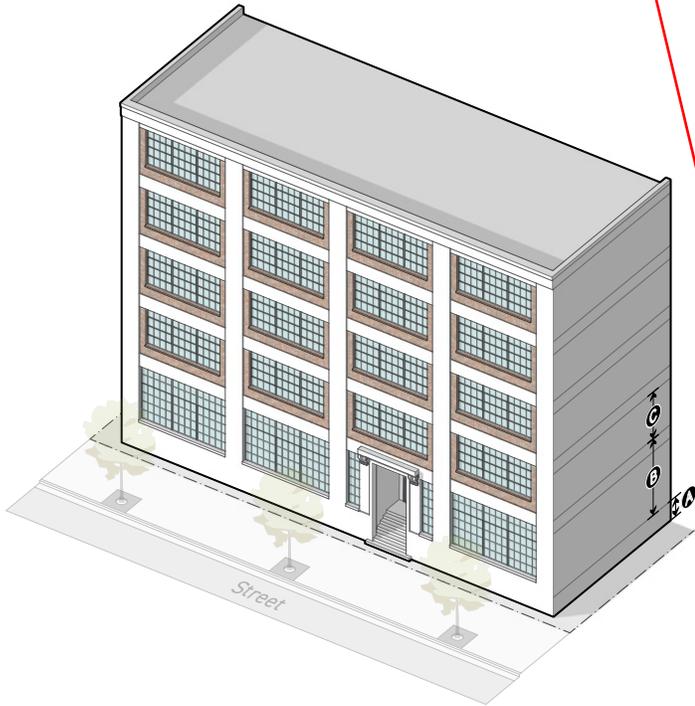
Can the Built-To portion of the facade contain a vehicle access point, serving internal loading areas, parking, drop-off, etc.

There could be limitations of where we can place access driveways, often requiring them to pass through buildings. Existing curb cuts, intersection setbacks, hydrants, utilities, etc.

What is driving the emphasis on vertical bands? This is not a universal facade treatment in the CDF1 district, and forcing this upon all new buildings is going to create a harsh distinction between New vs. Old

C. Stories

D. Facade



	Primary	Side
GROUND FLOOR ELEVATION	Sec. 3D.5.	
A Ground floor elevation (min/max)	-2'/5'	-2'/5'
STORY HEIGHT	Sec. 3D.6.	
B Ground story height (min)	22'	22'
C Upper story height (min)	12'	12'

	Primary	Side
ARTICULATION	Sec. 3D.7.	
A Base-top	Required	Required
B Vertical bands	Required	Required
Spacing (min/max)	20'/30'	20'/30'
Options	<ul style="list-style-type: none"> Projecting band Material band 	
Balcony	Prohibited	Prohibited

What is the purpose of the 22' ground story level minimum? Is the intent to encourage mezzanine levels? For smaller buildings, this becomes a major energy factor as the conditioned volume nearly doubles, plus the cost of building the extra height is considerable.

Why are balconies prohibited? Adjacent older buildings at 1000 S Santa Fe (SoHo House), and 1026 S Santa Fe feature projecting balconies in CDF1.

Balconies are a prominent local vernacular element in this district, featured on many older buildings.

What is interpretation of vertical band? Would a diagonal element count?

30' max spacing of vertical bands will conflict with wider column spacing to accommodate LA parking space requirements, and longer span systems that are efficient and desirable to tenants.



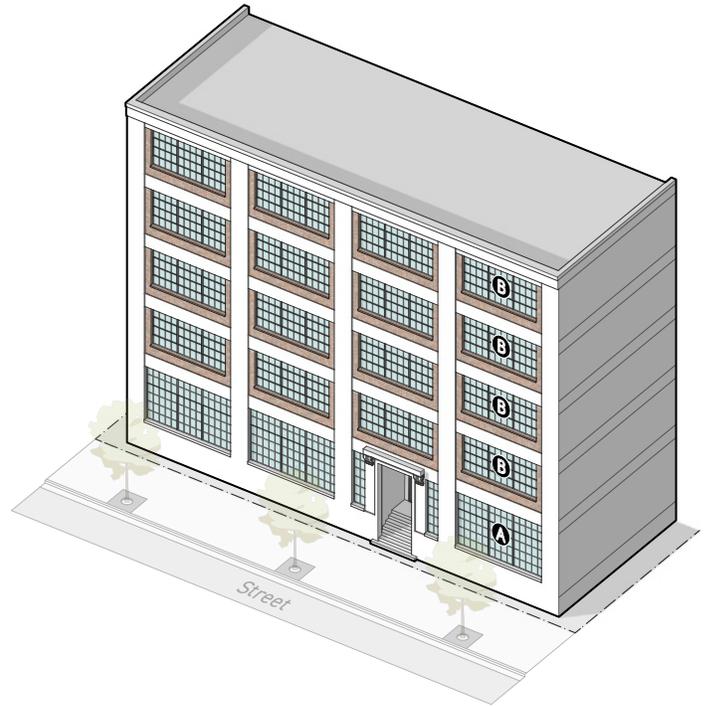
Define symmetrical lite pattern - does this apply to window patterns across entire facade, or makeup of window geometry within individual fenestrations, or both?

What is the negative perception of assymetrical window patterns? The requirement for any type of symmetry will lead to less opportunities for creativity.

One of the problems of the form based code is the buildings are intended to look the same, disguising the true use of the building within.

The request for more similarity in the way facades are designed will ultimately result in less creativity, and can prohibit the interior design and functions from expressing themselves on the exterior. For example, stairways with different fenestration points behind a primary facade.

F. Windows



	Primary	Side
ENTRANCES	Sec. 3D.8.	
A Street-facing entrance	Required	Required
B Entrance spacing (max)	100'	100'
Entry feature	Required	Required
Options	<ul style="list-style-type: none"> • Recessed entry • At-grade entry • Storefront bay 	
C Focal entry feature	1	1

	Primary	Side
TRANSPARENCY	Sec. 3D.9.	
A Ground story (min/max)	50%/80%	50%/80%
Blank wall width (max)	20'	30'
Window recession (min)	9"	9"
Symmetrical lite pattern	Required	Required
Horizontal sliding windows	Prohibited	Prohibited
Vinyl windows	Prohibited	Prohibited
B Upper stories (min/max)	40%/70%	30%/70%
Window recession (min)	6"	6"
Symmetrical lite pattern	Required	Required
Sill	Required	Required
Horizontal sliding windows	Prohibited	Prohibited
Vinyl windows	Prohibited	Prohibited

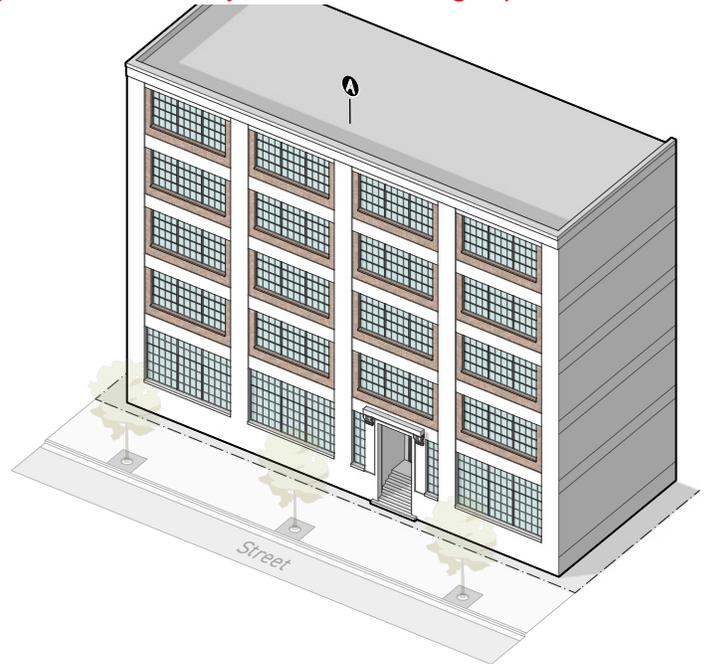
Modern waterproofing and envelope efficiency standards do not prioritize recessed windows. Likely will see the minimum required depth in all new buildings, creating further monotony.

Certain roof shapes provide more functionality and better user experience in the interior.

Other shapes are archetypal; A church, a bowtruss warehouse, a sawtooth factory, a gambrel barn.

Most existing buildings within CDF1 district do not have flat roofs, helping to create a unique visual landscape.

Los Angeles has had a roof restriction on skyscrapers for decades, creating monotonous flat top towers, while other cities get their diversity and identity from their many distinct building tops.



When buildings are more expensive to create at the beginning, they are more expensive to lease. These requirements could be perceived as indifferent to what the market can bear, and to the needs of an economically diverse population.

EXTERIOR MATERIALS		Sec. 3D.10.
A Principal materials (min)		70%
Options	<ul style="list-style-type: none"> • Brick • Solid stone • Concrete • Metal • Wood 	
B Accessory materials (max)		30%
Options	<ul style="list-style-type: none"> • Brick • Solid stone • Concrete • Metal • Wood 	
Number of accessory materials (max)		3

ROOF DESIGN		Sec. 3D.11.
A Roof form (options)		• Flat
Roof materials		n/a

Why are sloped / curved roofs not allowed? It seems absurd that there would be any restrictions on roof form, considering the enormous varieties of roofs that exist.

Limiting all new buildings to flat roofs will have a drastic effect, especially on smaller buildings where the roofline and resulting interior volume makes a huge impact. Roof shapes create variety of interior space.

Why is there an explicit list of approved materials? If the intent is to limit the use of cement plaster "stucco", that could be accomplished with fewer restrictions. It is however a classic southern California material.

Limiting building cladding is limiting imagination. It prioritizes materials not everyone can afford, that requires a higher price point for entry.

For smaller, lower buildings, flat roofs are almost never the first desired shape. Flat roofs limit span, which reduces the quality of the interior space.

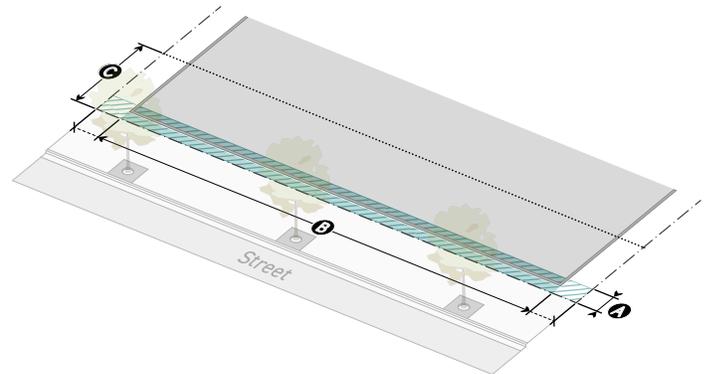
Finally, roof shapes can and should be sculpted to provide ventilation and shading, increasing the buildings efficiency and user comfort.

SEC. 3B.9.4. DAYLIGHT FACTORY / RIVER (CDR1)

A. Intent

[Reserved]

B. Lot



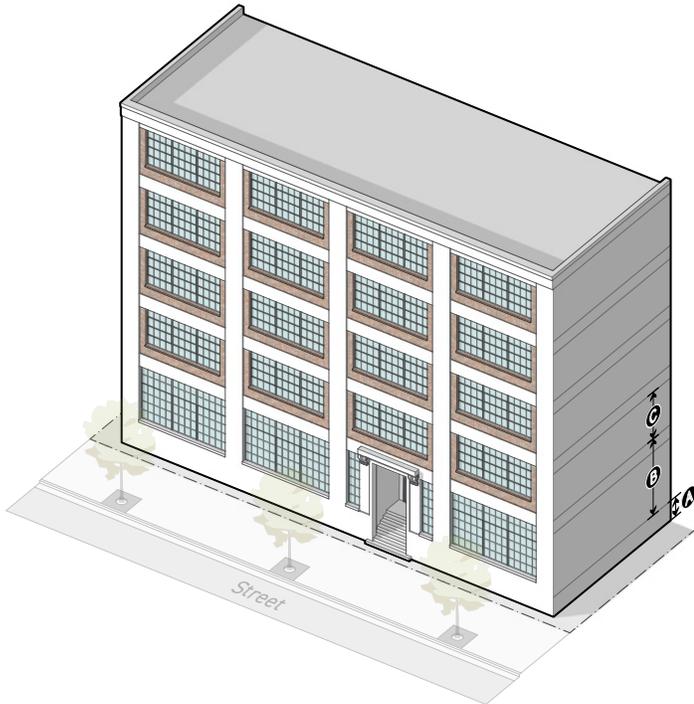
How does this River frontage plan affect a property which is partly in CDR1 but is separated from the river by another property?

Creating a large pedestrian paseo that ends up between two large buildings seems like a misapplication of the intent of this code.

	Primary	Side	River
BUILD-TO	Sec. 3D.2.		
Applicable stories (min)	3	3	3
A Build-to range (min/max)	0'/5'	0'/10'	20'/40'
B Build-to width (min)	90%	70%	70%
Pedestrian amenity modification (max)	30%	30%	40%
PARKING	Sec. 3D.3.		
C Street setback (min)	20'	5'	20'
FRONT YARD LANDSCAPE	Sec. 3D.4.		
Planted area (min)	5%	5%	75%
Privacy Screen allowed:	A1	A1	A3

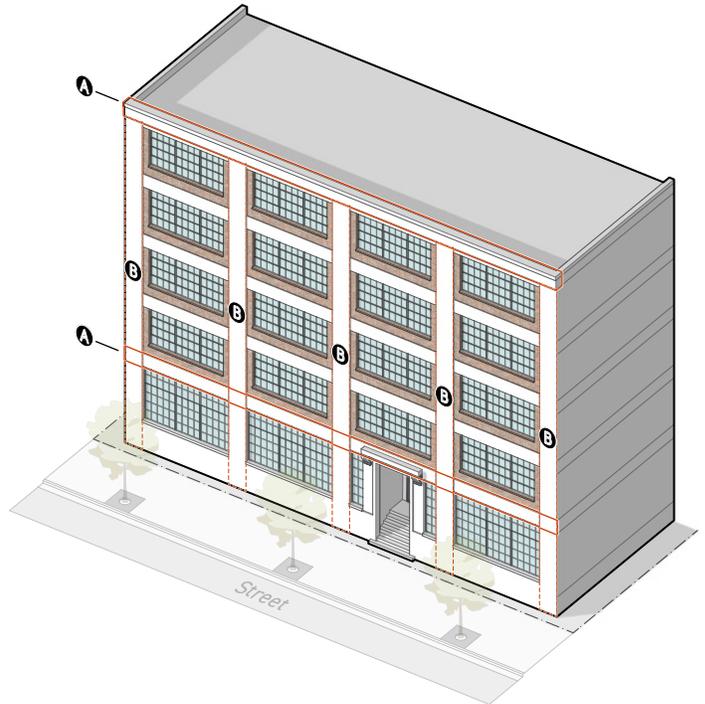
We understand the desire for vegetation near the river, but in an environment where water is a precious resource, prescribing a large percentage of land use that requires irrigation seems irresponsible, and assumes that the land owner can afford to do so.

C. Stories



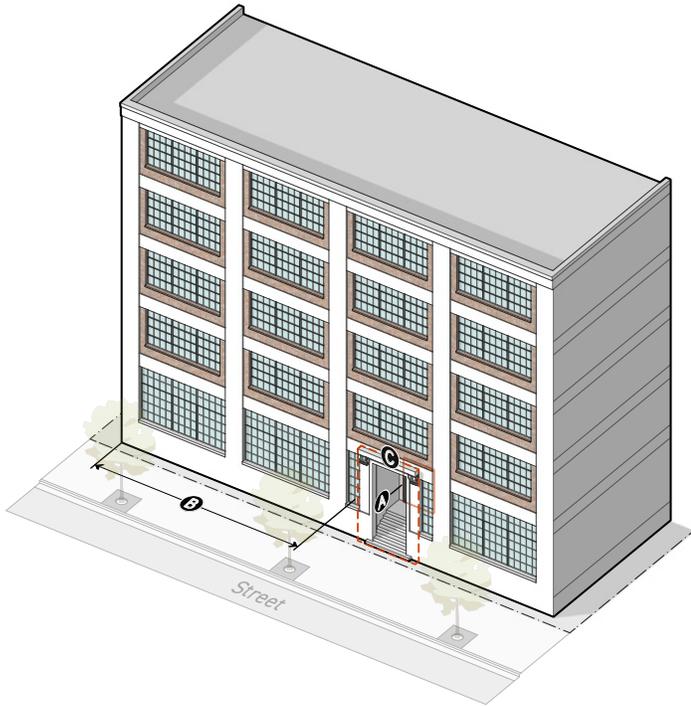
	Primary	Side	River
GROUND FLOOR ELEVATION	Sec. 3D.5.		
A Ground floor elevation (min/max)	-2'/5'	-2'/5'	-2'/5'
STORY HEIGHT	Sec. 3D.6.		
B Ground story height (min)	16'	16'	16'
C Upper story height (min)	12'	12'	12'

D. Facade



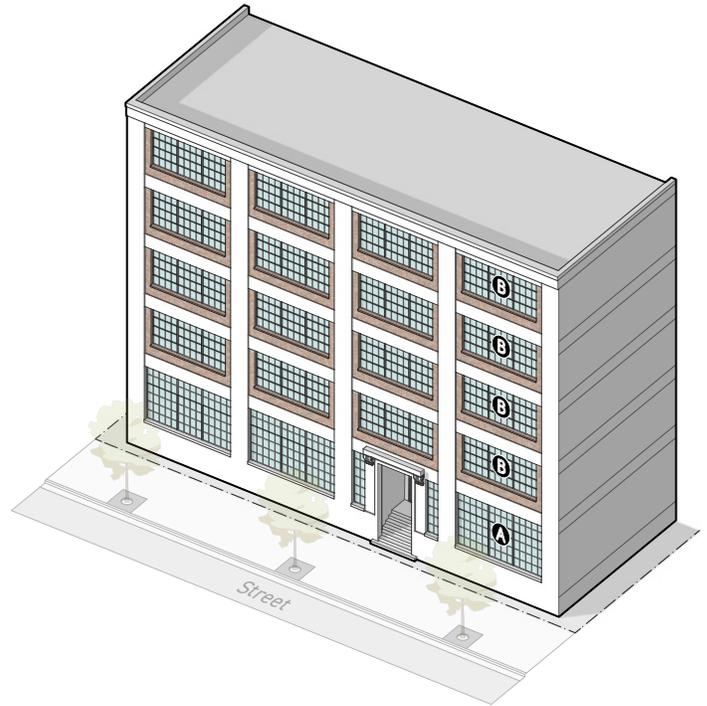
	Primary	Side	River
ARTICULATION	Sec. 3D.7.		
A Base-top	Required	Required	Required
B Vertical bands	Required	Required	Required
Spacing (min/max)	20'/30'	20'/30'	20'/30'
Options	<ul style="list-style-type: none"> • Projecting band • Material band 		
Balcony	Prohibited	Prohibited	Allowed

E. Doors



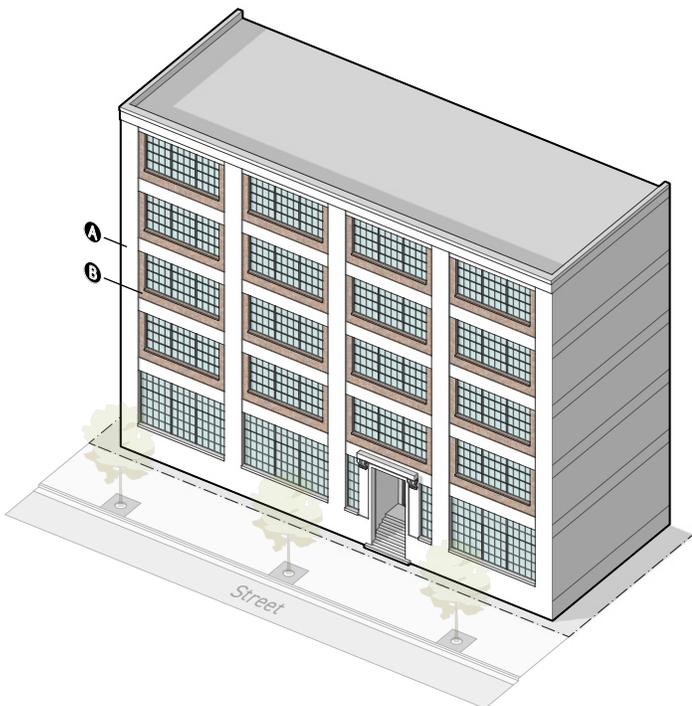
	Primary	Side	River
ENTRANCES	Sec. 3D.8.		
A Street-facing entrance	Required	Required	Required
B Entrance spacing (max)	100'	100'	100'
Entry feature	Required	Required	n/a
Options	<ul style="list-style-type: none"> • Recessed entry • At-grade entry • Storefront bay 		
C Focal entry feature	1	1	n/a

F. Windows

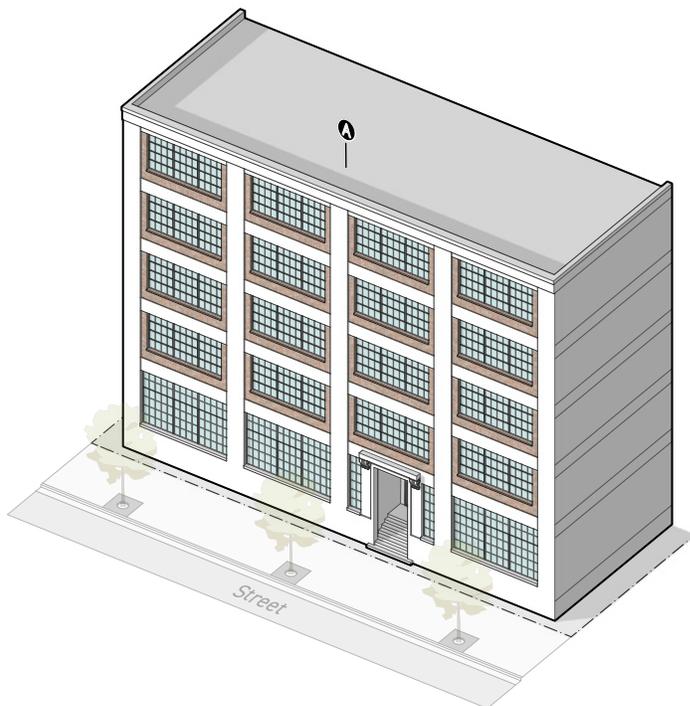


	Primary	Side	River
TRANSPARENCY	Sec. 3D.9.		
A Ground story (min/max)	50%/80%	50%/80%	30%/80%
Blank wall width (max)	20'	30'	30'
Window recession (min)	9"	9"	9"
Symmetrical lite pattern	Required	Required	Required
Horizontal sliding windows	Prohibited	Prohibited	Prohibited
Vinyl windows	Prohibited	Prohibited	Prohibited
B Upper stories (min/max)	40%/70%	30%/70%	30%/70%
Window recession (min)	6"	6"	6"
Symmetrical lite pattern	Required	Required	Required
Sill	Required	Required	Required
Horizontal sliding windows	Prohibited	Prohibited	Prohibited
Vinyl windows	Prohibited	Prohibited	Prohibited

G. Cladding



H. Roof



EXTERIOR MATERIALS		Sec. 3D.10.
A Principal materials (min)		70%
Options		<ul style="list-style-type: none"> • Brick • Solid stone • Concrete • Metal • Wood
B Accessory materials (max)		30%
Options		<ul style="list-style-type: none"> • Brick • Solid stone • Concrete • Metal • Wood
Number of accessory materials (max)		3

ROOF DESIGN		Sec. 3D.11.
A Roof form (options)		• Flat
Roof materials		n/a

DIV. 4B.5. **DEVELOPMENT STANDARD DISTRICT 5**

SEC. 4B.5.1. **INTENT**

This Development Standards District supports areas where walking, biking, and public transit are the prioritized modes of transportation.

Pedestrian connections increase porosity in long blocks facilitating pedestrian movement and contributing to a pedestrian-friendly environment. No minimum parking is required, and when it is provided above-grade, it must meet high standards of design. On-site signs are sized and located to support a pedestrian-oriented public realm.

SEC. 4B.5.2. **STANDARDS**

A. Access		Div. 4C.1.	
PEDESTRIAN ACCESS		Sec. 4C.1.1.	
Pedestrian access package		1	
PEDESTRIAN CONNECTION		Sec. 4C.1.2.	
Pedestrian connections		Required every 350'	
B. Parking		Div. 4C.2.	
AUTOMOBILE PARKING		Sec. 4C.2.2.	
Required parking ratios		Parking Set E	
Additional parking for commercial change of use		n/a	
PARKING AREA DESIGN		Sec. 4C.2.4.	
		Primary St.	Side St.
Parking Garage			
Ground Story		Wrapped	Wrapped
Upper Stories		Adaptable	Adaptable
Integrated Parking			
Ground Story		Wrapped	Wrapped
Upper Stories		Wrapped	Adaptable
C. Signs		Div. 4C.6.	
Sign Package		2	

See Part 4C (General Development Standards) for additional development standards that apply.

DIV. 5B.5. INDUSTRIAL-MIXED USE DISTRICTS

Industrial-Mixed Use Districts accommodate a mixture of light industrial, office, and research and development activity, with limited residential uses and other compatible uses.

SEC. 5B.5.1. TABLE OF USES

	IX1 5B.6.2.	IX2 5B.6.3.	IH1 5B.6.4.	IH2 5B.6.5.	
RESIDENTIAL USES					
Household Living	LD	--	LD	LD	
Apartment Hotel	--	--	--	--	
Boarding or Apartment House	--	--	--	--	
Community Care Facility, Licensed; As Listed Below:					
6 or fewer	--	--	--	--	
7 or more	--	--	--	--	
Dormitory Room	--	--	--	--	
Fraternity/Sorority Housing	--	--	--	--	
Homeless Shelter	LG	LG	LG	LG	5C.2.1.
Live Work, Except as Listed Below	--	--	LD	LD	
Joint Living and Work Quarters	--	LG	LG	LG	5C.2.2.
Mobilehome Park	--	--	--	--	
Senior Living, As Listed Below:					
Eldercare Facility	--	--	--	--	
Alzheimer's and Dementia Care Housing	--	--	--	--	
Assisted Living	--	--	--	--	
Senior Independent Living	--	--	--	--	
Skilled Nursing Home	--	--	--	--	
Substance Abuse Facility, Licensed, As Listed Below:					
6 or Fewer	--	--	--	--	
7 or More	--	--	--	--	
PUBLIC AND INSTITUTIONAL USES					
Civic, Except as Listed Below:	P	P	P	P	
Community Center	P	P	P	P	
Convention Center	--	--	--	--	
Ground Passenger Terminal	P	P	P	P	
Correctional or Penal Institution	C3	C3	C3	C3	
Counseling and Referral Facility	P	P	P	P	
Nature Conservation Area	P	P	P	P	
Parking	P	P	P	P	
Park and Open Space	P	P	P	P	

KEY: P=Permitted Use; LD=Limited by Use District; LG=Limited by General Use Standard;
 C1=Approval by Zoning Administrator; C2=Public Hearing by Zoning Administrator;
 C3=Review by City Planning Commission; *Use may be limited by adjacent Use District; --=Use Not Permitted

	IX1 5B.6.2.	IX2 5B.6.3.	IH1 5B.6.4.	IH2 5B.6.5.	
House of Worship	C2	C2	C2	C2	
Public Safety Facility	P	P	P	P	
School, As Listed Below:					
School, K-12	C3	C3	C3	C3	
School, Postsecondary	C3	C3	C3	C3	
Shoreline Project	C3	C3	C3	C3	
Utilities, As Listed Below:	LG	LG	LG	LG	5C.3.3.
Solar Panel Energy Generating Facility	LG	LG	LG	LG	5C.3.4.
GENERAL COMMERCIAL USES					
Adult Entertainment Business	--	LG	LD	LD	5C.4.1.
Alcohol Sales, As Listed Below:					
On-Site Sale	C2	C2	C2	C2	
Off-Site Sale	--	C2	C2	C2	
Animal Care, Sales and Services, Except as Listed Below:	P	P	LG	LG	5C.4.6.
Kennel	LD	LD	--	--	
Veterinary Hospital	LD	LD	LD	LD	
Cemetery, Except as Listed Below:	LG	LG	LG	LG	5C.4.5.
Funeral and Related Services	C2	C2	C2	C2	
Day Care Facility	C2	C2	C2	C2	
Eating and Drinking Establishment, Except as Listed Below:	P	P	P	P	
Drive-Through Eating and Drinking Establishment	--	--	--	--	
Entertainment Venue, As Listed Below:					
Auditorium	P	P	P	P	
Banquet Hall	--	--	P	P	
Dance Hall	C2	C2	C2	P	
Live Entertainment (Cafe/Shows, Karaoke)	C2	C2	C2	C2	
Sports Arena and Stadium	C3	C3	C3	C3	
Theater	P	P	P	P	
Financial Services, Except as Listed Below	P	P	P	P	
Alternative Financial Services	--	--	--	--	
Hotel, Except as Listed Below:	P	--	C2	C2	
Motel	P	--	C2	C2	
Transient Occupancy Residential	--	--	C2	C2	
Instructional Services	P	P	P	P	
Medical Facility, Except as Listed Below:	P	P	P	P	
Ambulance Services	P	P	P	P	
Hospice	--	--	--	--	
Hospital	C3	C3	C3	C3	5C.9.8.

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	IX1 5B.6.2.	IX2 5B.6.3.	IH1 5B.6.4.	IH2 5B.6.5.	
Office, Except as Listed Below:	P	P	P	P	
Creative Media Office	P	P	P	P	
Personal Services, Except as Listed Below:	P	P	P	P	
Massage Therapy	P	P	P	P	
Private Club	C2	C2	C2	C2	
Recreation, Indoor; Except as Listed Below:	P	P	P	P	
Gym	P	P	P	P	
Recreation, Outdoor; Except as Listed Below:	P	P	P	P	
Golf Course	--	--	--	--	
Retail Sales, Except as Listed Below:	P	P	P	P	
Certified Farmers' Market	LG	LG	LG	LG	5C.4.4.
Food and Beverage Store	P	P	P	P	
Gun Sales	C2	C2	C2	C2	
Smoke and Vape Shop	--	LD	LD	LD	
Swap Meet	P	P	P	P	
HEAVY COMMERCIAL USES					
Car Wash	--	LG	--	--	5C.4.4.
Fueling Station	--	LG	--	--	5C.5.2.
Vehicle Repair, As Listed Below:					
Vehicle Repair, Light	LG	LG	LG	LG	5C.5.4.
Vehicle Repair, Heavy	--	--	--	--	
Vehicle Sales and Rental, As Listed Below:					
Used Vehicle Sales, Light	--	LG	LG	LG	5C.5.3.
Vehicle Sales and Rental, Light	--	LG	LG	LG	5C.5.6.
Vehicle Sales and Rental, Heavy	--	--	--	--	
Vehicle Storage, As Listed Below:					
Official Police Garage	LG	LG	LG	LG	5C.5.8.
Vehicle Storage, Light	--	--	--	--	
Vehicle Storage, Heavy	--	--	--	--	
LIGHT INDUSTRIAL USES					
Computer and Electronic Product Assembly	P	P	P	P	
Food and Drink Manufacturing, Except as Listed Below:	P	P	P	P	
Alcoholic Beverage Manufacturing	P	P	P	P	
Furniture and Related Products Manufacturing	P	P	P	P	
General Light Manufacturing	P	P	P	P	
Maintenance and Repair Services	P	P	P	P	
Research and Development	P	P	P	P	
Self-Service Storage	LD	LD	--	--	

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	IX1 5B.6.2.	IX2 5B.6.3.	IH1 5B.6.4.	IH2 5B.6.5.
Soundstages and Backlots	P	P	P	P
Textile and Apparel Manufacturing	P	P	P	P
Wholesale Trade and Warehousing	P	P	P	P
HEAVY INDUSTRIAL USES				
Airport	--	--	--	--
Animal Products Processing	--	--	--	--
Chemical Product Manufacturing, Except as Listed Below:	--	--	--	--
Cosmetic, Pharmaceutical Drug, and Soap Manufacturing	P	P	P	P
Freight Terminal	--	--	--	--
General Storage, Except as Listed Below:	--	--	--	--
Cargo Container Storage Yard	--	--	--	--
Junk Yard Facility, Except as Listed Below:	--	--	--	--
Auto Dismantling	--	--	--	--
Scrap Metal Yard	--	--	--	--
Machinery and Fabricated Metal Manufacturing	--	--	--	--
Nonmetallic Mineral Product Manufacturing	--	--	--	--
Petroleum and Coal Product Manufacturing	--	--	--	--
Plastic and Rubber Product Manufacturing	--	--	--	--
Primary Metal Manufacturing	--	--	--	--
Railway Facility	--	--	--	--
Resource Extraction, Except as Listed Below:	--	--	--	--
Oil and Gas Extraction	--	--	--	--
Solid Waste Facility, Except as Listed Below:	--	--	--	--
Green Waste and Wood Waste Facility	--	--	--	--
Hazardous Waste Facility	--	--	--	--
Solid Waste Alternative Technology Processing Facility	--	--	--	--
Recycling Centers and Facilities, As Listed Below:				
Recycling Collection or Buyback Center	C3	C3	--	--
Recycling Materials Sorting Facility	--	--	--	--
Recycling Materials Processing Facility	--	--	--	--
Wood and Paper Manufacturing	--	--	--	--
AGRICULTURAL USES				
Animal Keeping, Wild	--	--	--	--
Animal Farming, Except as Listed Below	--	--	--	--
Equinekeeping, Commercial	--	--	--	--
Equinekeeping, Non-commercial	--	--	--	--
Livestock Keeping	--	--	--	--
Farming (Plant Cultivation), Except as Listed Below:	P	P	P	P
Truck Gardening	P	P	P	P

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E. Open Storage Limitations

Open storage of materials and equipment, including used materials and equipment, shall be in compliance with 4C.3.5.C.2.b. (Open Storage Screening Type B).

SEC. 5B.5.5. INDUSTRIAL-MIXED HYBRID 2 (IH2)

A. Intent

The IH2 District supports office and commercial uses, as well as research and development, wholesale, and light industrial uses. The Use District allows for a limited amount of Live/Work units. The District is intended to promote productive industries and entrepreneurial activities.

B. Use District Standards

1. All new structures shall be built entirely with Type I, II, or IV construction, as defined in the Los Angeles Building Code and verified by the Los Angeles Department of Building and Safety.

C. Use Limitations

1. Household Living

- a. Residential Dwelling Units and Guest Rooms are permitted as part of a Qualified Permanent Supportive Housing Project which is eligible for the Qualified Permanent Supportive Housing Incentive Program, as defined in Section 9C.5.1
- b. New construction is not permitted, unless the use is part of a Qualified Permanent Supportive Housing Project as described in Paragraph (a).

2. Live/Work (for new construction)

- a. The Minimum Average Unit Size of all Live/Work Units contained on a Lot shall be no less than 1,000 square feet.
- b. Between 48 and 50 percent of each Unit shall be designated as workspace area. The workspace area shall be no smaller than 150 SF and measure not less than 15 feet in at least one dimension and no less than 10 feet in any dimension. The required workspace area for each unit shall be clearly demarcated on approved building plans.
- c. The workspace area shall be assigned a non-residential use permitted in the Office Use Group, or the Agricultural, Heavy Commercial or Light Industrial Use Categories.
- d. Excluding area used for bathrooms and storage, at least 70 percent of the floor area of each Live/Work unit shall be open with no fixed interior separation wall
- e. Inclusion of other uses. Live/work units shall not be permitted unless a minimum amount of non-residential uses are included within a lot such that:
 - i. The gross floor area of these uses equates to a minimum amount of at least 150% of the lot area and;

- ii. Such space be assigned to a use permitted in the Office Use Group, or the Agricultural, Heavy Commercial, or Light Industrial Use Categories.
- f. The entire structure shall have a 50-foot minimum distance from any uses within the Heavy Industrial Use Category.

3. Adult Entertainment Business

- a. A Sexual Encounter Establishment is not permitted.
- b. The use shall comply with the use standards in Sec. 5C.4.1. (Adult Entertainment Business).

4. Veterinary Hospital

- a. Must be within a fully enclosed building.
- b. No outside keeping of animals permitted.

5. Smoke and Vape Shop

- a. This use must be within a fully enclosed building.

D. Conditional Uses

The following uses require a Conditional Use Permit, pursuant to Sec. 13.4.1. (Conditional Use Permit, Class 1), Sec. 13.4.2. (Conditional Use Permit, Class 2) and Sec. 13.4.3. (Conditional Use Permit, Class 3), as specified by the applicable Use Table.

1. Correctional or Penal Institution
2. House of Worship
3. Schools, K-12
4. School, Postsecondary
5. Shoreline Project
6. Alcohol Sales, Off-Site Consumption.
 - a. The use shall also comply with the use standards in Sec. 5C.4.2. (Alcohol Sales, Off-Site Consumption).
7. Alcohol Sales, On-Site Consumption.
 - a. The use shall also comply with the use standards in Sec. 5C.4.3. (Alcohol Sales, On-Site Consumption).
8. Funeral and Related Services
9. Day Care Facility

- a. The use must be providing care primarily for children of employees of businesses/ industries in the vicinity.

10. Dance Hall

11. Live Entertainment

12. Sports Arena and Stadium

13. Hotel

- a. This use is limited to 75 Guest Rooms.

14. Motel

- a. This use is limited to 75 Guest Rooms.

15. Transient Occupancy Residential.

- a. Permitted only in new construction.
- b. New construction of this use is limited to 75 Guest Rooms or Dwelling Units.
- c. Conversion of Residential Units to this use is prohibited.

16. Hospital

17. Private Club

18. Gun Sales.

- a. Supplemental Findings. In addition to the findings otherwise required, the Zoning Administrator shall also consider whether the proposed use will result in an over-concentration of this use in the area, and the number of firearms available for sale at the site.

E. Open Storage Limitations

Open storage of materials and equipment, including used materials and equipment, shall be in compliance with 4C.3.5.C.2.b. (Open Storage Screening Type B).



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Los Angeles, CA 90021
213.683.0522 Tel
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skidrow.org

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Lee Raagas
Chief Executive Officer

November 11, 2020

Vince Bertoni
Director of Department of City Planning
City of Los Angeles
200 N. Spring Street, Suite 525
Los Angeles, CA 90012

Re: Central City and Central City North Community Plan Update & Environmental Impact Report (“EIR”) Response Letter

Dear Mr. Bertoni,

Thank you for the opportunity to engage in the process and allowing for the mechanism to communicate Skid Row Housing Trust’s (“the Trust”) perspective and position. The Executive Leadership Team and the Board of Directors of the Organization submit this letter in response to the *DRAFT* Central City and Central City North Community Plan and EIR.

Since 1989, the Trust has been committed to solving homelessness and improving the health and safety of all community members in Los Angeles. The Organization has done this by providing permanent supportive housing (“PSH”) along with wrap around services in the County’s most impoverished neighborhood, Skid Row. The Trust builds and operates beautifully designed, high quality housing projects that serve as neighborhood anchors. We offer 1,897 apartment homes to the people who need them most. The Trust is one of the largest property owners and operators of PSH in Los Angeles with 25 of 27 total buildings in our portfolio located in the Industrial District, Arts District, Historic Core, Toy District, Fashion District, and South Park. The Organization has been headquartered in the Industrial District at E. 7th Street and S. Central Avenue for 30 years. We serve the mission to end homelessness and advocate for equitable and inclusive housing for all.

The Trust is grateful for the diligence and work put into the *DRAFT* community plan by LADCP and staff. The Trust also supports the draft community plan but appreciates the opportunity to offer suggestions to make it more consistent with the City's historic and continuing values to achieve equity, diversity, and inclusivity while trying to fill the deep deficit for housing needs while creating economic opportunities to the Community as a whole. Please find the following bullets outlining key perspectives on this important issue:

- Skid Row Housing Trust supports the provisions to require affordable housing as a prerequisite to development incentives to produce much needed affordable housing and distribute them all across DTLA. The opportunity for mixed income, mixed use, and mixed housing should apply to all parts of downtown where housing is allowed.
- Skid Row Housing Trust strongly opposes only allowing 100% affordable housing in Skid Row where we have the highest concentration of poverty. Further concentrating and perpetuating poverty is neither equitable, diverse, nor inclusive. The Organization advocates for a mixed income, mixed use, and mixed housing in Skid Row and oppose this proposed exclusionary zoning policy. We suggest allowing all types of housing in the Industrial District similar to the Industrial-Mixed Hybrid zone proposed in the Fashion District.
- Skid Row Housing Trust supports the inclusion of PSH in the Arts District but opposes the restrictions on other housing types. The current draft only allows live/work units with minimum 1,000 square footage, average size in Type I, II, and IV construction types. On the west side of Alameda in Skid Row, the community plan proposal results in a long term economically poor community. On the east side of Alameda in the Arts District, only large units with more expensive construction types are allowed. This is an exclusionary policy that will inadvertently create an affluent community lacking economic diversity and limits housing appropriate for families, further exacerbating the issues of equity, diversity, and inclusivity against the intended values of the community plan. The Organization suggests allowing all types of housing in the Arts District where housing is allowed similar to the Fashion District.
- Skid Row Housing Trust suggests adding further incentives for developments that can enhance safety and activity on 6th and 7th Street corridors through Skid Row (from Los Angeles Street to the west to Alameda Street to the east). By offering a higher level and larger incentives, these corridors can potentially better connect the Financial District, Historic Core, and the Arts District and are all are critical to contribute to Skid Row's opportunity to be part of the renaissance of DTLA. Incentives that help diversify the land use conversions



along these corridors and bring essential goods and services back into a community that is devoid of diversity, support, and the fundamental building blocks of a complete community.

- Lastly, the Organization suggests LADCP reconsider land uses adjacent to existing and future transit routes on 7th Street and Alameda Street and designate them as Transit Core. These are areas that support and facilitate high public tax dollar investments and should allow for more opportunities for housing production. This area should receive the same consideration as Transit Core with removal of development hurdles such as minimum parking requirements. The Trust is focused on ending homelessness through a multi-pronged approach, the primary being development and building of PSH units. However, the Organization advocates to prevent individuals and families from falling into homelessness in the first place which is possible with more diverse housing options. Los Angeles and Skid Row along with downtown Community members need more housing. The community plan should assimilate all perspectives and integrate many different opportunities for a holistic benefit. There is a significant risk that would be an opportunity lost if this plan does not put more housing near transit.

The Trust is currently developing more than 1,000 new homes and will continue to build thousands more to end homelessness. To make this possible, we need pro-housing policies and rules in place to produce more housing at a lower cost with significantly improved speed to build. California is 49th in housing production per capita. The upcoming *Housing Element* shows for the next eight (8) years, LA calls for more than 460,000 units of new homes to meet the housing needs in City of Los Angeles alone. Central City and Central City North Community Plan update is a prime opportunity to address the housing crisis while simultaneously bringing awareness and solutions to the inequities in housing access and economic opportunities. We applaud the efforts by LADCP and its staff to implement a vision for an equitable, diverse, and inclusive plan for the next 20 years in our DTLA community. There are many positive changes in the current draft community plan but Skid Row Housing Trust believes it can be further improved by exploring and implementing the above suggested recommendations and/or changes. Without these changes, the city will be implementing exclusionary zoning policies Skid Row and Arts District and squandering potential opportunities for more housing near existing and future transit.

We respectfully request that the City more fully evaluate in the EIR the social and economic impacts associated with restrictive zoning that limits market rate and other development in Skid Row and conversely limits the type of housing and restrictions on PSA in the Arts District. The City should consider Project alternatives and additional



mitigation measures that more fully address the adverse environmental, social, and economic impacts of restrictive zoning on housing types in Skid Row and the Arts District.

Thank you for the opportunity to comment on the Draft Central City and Central City North Community Plans and look forward to your responses.

Sincerely,

A handwritten signature in blue ink, consisting of several loops and a trailing line.

Simon Ha, AIA
Chairman of the Board of Directors
Skid Row Housing Trust

cc:

Kevin De León, LA City Council District 14
Samantha Millman, LA City Planning Commission
Craig Weber, LADCP
Brittany Arceneaux, LADCP
Valerie Watson, LADCP
Lee Raagas, Skid Row Housing Trust
Sierra Atilano, Skid Row Housing Trust
Antonio Le Mons, Skid Row Housing Trust





Cherry Yap <cherry.yap@lacity.org>

Fwd: DTLA Community Plan 2040 - Comment Letter DRAFT

Brittany Arceneaux <brittany.arceneaux@lacity.org>

Fri, Dec 4, 2020 at 3:11 PM

To: Cherry Yap <cherry.yap@lacity.org>, Jordan Hallman <jordan.hallman@lacity.org>

----- Forwarded message -----

From: **Brittany Arceneaux** <brittany.arceneaux@lacity.org>

Date: Mon, Oct 5, 2020 at 9:49 AM

Subject: Re: DTLA Community Plan 2040 - Comment Letter DRAFT

To: Tom Williams <ctwilliams2012@yahoo.com>

Cc: Virginia W Wexman <vwexman@uic.edu>, Darrell Clarke <darrclarke@gmail.com>, Francine Oschin <francineoschin@gmail.com>, John Nilsson <dtlanow@gmail.com>, dennyane@movela.org <dennyane@movela.org>, yanityak@gmail.com <yanityak@gmail.com>, Charles Adelman <adelmancharles2@gmail.com>, Michael Milroy <mmilroy83@yahoo.com>, bartreed1951@gmail.com <bartreed1951@gmail.com>, Barbara Hensleigh <barbarajhensleigh@gmail.com>, schankj@metro.net <schankj@metro.net>, walkerg@metro.net <walkerg@metro.net>, clarker@metro.net <clarker@metro.net>, Sharon Lee Koch <slkoch@ix.netcom.com>, Denis Loya, Angeles Chapter <morgan.goodwin@sierraclub.org>, sierraclub.stevewicke@gmail.com <sierraclub.stevewicke@gmail.com>, Willmcw <willmcw@gmail.com>, Dave Cook <dave.cook@railpropulsion.com>, Nicholas Maricich, Director Planning Policy And Development <nicholas.maricich@lacity.org>, therailguy@yahoo.com <therailguy@yahoo.com>, aeaken@nrdc.org <aeaken@nrdc.org>, crubin@nrdc.org <crubin@nrdc.org>, skiles@ucla.edu <skiles@ucla.edu>, coby@hpstrat.com <coby@hpstrat.com>, rvframpton@hotmail.com <rvframpton@hotmail.com>, mezzohiker@man.com <mezzohiker@man.com>, Faramarz Nabavi <transit@regenerativecommunities.org>, jankidwell@sbcglobal.net <jankidwell@sbcglobal.net>, erin.coleman@lacity.org <erin.coleman@lacity.org>, fsbaffirm@gmail.com <fsbaffirm@gmail.com>, Stephanie Liu <stephliu@gmail.com>, Shana Bonstin <shana.bonstin@lacity.org>, Mike <mclark.udg@gmail.com>

Hi Tom,

Thank you, your comments have been received and filed.

Best,
Brittany

On Fri, Oct 2, 2020 at 11:52 AM Tom Williams <ctwilliams2012@yahoo.com> wrote:

Thanks Tom

More comments coming in

Draft EIR Dept City Planning <https://planning4la.org/development-services/eir>. **Comment Period: August 6, 2020 9 AM - December 4, 2020. 5 PM**

comments on DEIR, include: comments *name, telephone number, and contact information*

Quimby Funds - In Lieu of Open Space on Development Sites.

Dpt Rec&Park don't want to use them, as they are only for land and facilities...NO O&M funds, Install water fountain but cannot pay for water to operate it.

City Controller found \$15 MMMMMM in a Quimby account of Dpt Rc&Pk WHY...no O&M funds to service any new facilities. AND City Treasurer want to keep them unspent??? WHY? Interest% on \$15M was not limited in use and LACT could get them for general fund uses...

Congestion Pricing

Delineate - LARiver (east side), SR-110 (north side), I-110 (west side), & I-10/Washington Blvd. (south side)

Eliminate street parking in DTLA, Eliminate ground-level off-street parking

Connect with Free Park-N-Rides - LACity Limits Eastside - El Sereno-Huntington Drive, CSULA/Caltrans lands-Valley Blvd., Highland Park-Figueroa/Ave 51

Integrate PNRs with affordable housing Comm./Res. TOC developments (3-5 floors)

Tom

On Friday, October 2, 2020, 06:03:44 AM PDT, Mike <mclark.udg@gmail.com> wrote:

Sierra Club
Angeles Chapter

Brittany Arceneaux
Los Angeles Department of City Planning
[200 N. Spring St., Room 667](#)
[Los Angeles, CA 90012](#)

Ms Arcenenaux,

Our Comments are as follows:

1. Decoupling and Land Use with no minimum Parking Requirement. This is a long sought objective of Sierra Club, and we commend you for this Historic Step.
2. Community Benefits - this is also an excellent concept for inclusion. The history is spotted with unused funds, lack of clarity on where used and cumulative documented results. Another issue is using these funds for benefits already included in the Plan. However, we want to commend for adding active used to the street fronts of above grade Parking. Eliminate on street parking, add bike lanes and sidewalk uses e.g. Outside dining.
3. Add inclusion of Transfer of Development Rights. This has long been used as an **important source of Funds** e.g. Preservation of Central Library. To have this Vast source of available Funds, and not use them, is a Great Oversight. This is a huge source of funds which could be applied, for example:

A. Parks in Park deprived Neighborhoods

B. Saving Historic Buildings e.g. Central Library

C. New or Revitalized Parks for Community Plans

D. Long term source of funds for a Vast increase in the number and diversity of Parks in the City e.g. Along the Los Angeles River, and Mini Parks

E. Anticipated support of **Metro Congestion Pricing "Pilot"** which will probably focus on Downtown LA and include free transit access as component

The Transfer of Development Rights should be to areas within one quarter mile of Rail Transit Stations

An impressive start.

Mike Clark, Chair, Virginia Wexman, Vice Chair

Sierra Club Angeles Chapter Transportation Committee



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CITY PLANNING

Brittany Arceneaux

She, Her, Hers

City Planner

Los Angeles City Planning

[200 N. Spring St., Room 667](#)

[Los Angeles, CA 90012](#)

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T: (213) 978-1911



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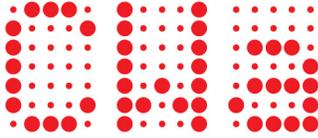


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December 8, 2020

Los Angeles City Planning
Attn: Brittany Arceneaux, City Planner

RE: Remarks to the Draft of the Downtown Community Plan Update

Dear Ms. Arceneaux,

I write in support of Joey Shimoda's letter to you regarding the new code proposal. As an architect who has also been building within the City of Los Angeles for 29 years now, I would like to express my concerns about the current draft of the Downtown Community Plan Update and the Code recommendations for Recode LA 2040.

I am frankly alarmed at the arbitrary nature of the design constraints illustrated, and the lack of foresight or indeed concern about their impacts on the two important players in the urban development scene: meaning developers and architects.

Urban redevelopment hinges on the financial viability of projects which are always by nature risky. To the extent that a city places financial burdens on a project, development will move to where it is easier to build. Of course this is nothing new, but a good city will target what is essential to preserving or extending the 'urban vitality' of a place. This is more critical than attempting to preserve 'character', which could lead to sterility or urban atrophy as development has been driven away. And indeed in the case of current code proposals, even 'character' is not being preserved or extended, since the area has never been a homogenous precinct.

There are numerous misconceptions embedded in this code proposal. Perhaps the most egregious of these guidelines prohibits balconies, which are not only a code requirement for multi-family housing in almost all California jurisdictions, but an absolutely essential connection to the outdoors for apartment living. Seriously?

Required vertical and horizontal bands on buildings? Horizontal sliding windows banned? What century do we live in? The level of urban conversation here is extraordinarily mundane. And mundanity cannot be a goal of urban redevelopment. The building images used in the code are consistently dull and ordinary, with no memorable features. Is this the city of the future?

Please engage a suitable quorum of experts, meaning architects and developer clients to rethink these proposals. This is really not worthy of one of the world's greatest cities and could have seriously negative impacts on the future vitality of downtown Los Angeles – the very opposite of what must be intended.

Sincerely,

Clive Wilkinson FAIA, RIBA, FIIDA
President and Design Director

cc: Craig Weber craig.weber@lacity.org
Shana Michele Murphy Bonstin shana.bonstin@lacity.com
Will Wright will@aialosangeles.org

CLIVE WILKINSON ARCHITECTS

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Cherry Yap <cherry.yap@lacity.org>

Fwd: DTLA 2020 Program Feedback

Brittany Arceneaux <brittany.arceneaux@lacity.org>

Mon, Dec 7, 2020 at 12:22 PM

To: Jordan Hallman <jordan.hallman@lacity.org>, Cherry Yap <cherry.yap@lacity.org>

----- Forwarded message -----

From: **Brittany Arceneaux** <brittany.arceneaux@lacity.org>

Date: Fri, Dec 4, 2020 at 11:23 AM

Subject: Re: DTLA 2020 Program Feedback

To: John Whitaker <johnwhitaker.home@gmail.com>

Cc: David Waite <dwaite@coxcastle.com>, Eric J. Cohn <ECohn@coxcastle.com>

Hi John,

Thank you for providing this clarification. Your comments have been received and filed. We are happy to share the economic analysis. The document can be found [here](#). We are in the process of updating the report to reflect the change in affordability calculations. The calculation was recently updated to account for the total number of units within the project. I will share that updated document with you when it is available.

We would be happy to review your findings and share them with our consultant.

Best,
Brittany

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On Thu, Dec 3, 2020 at 4:07 PM John Whitaker <johnwhitaker.home@gmail.com> wrote:

FYI Brittany in case you do not receive the general email responses. Thanks for all you are personally doing. John

John Whitaker
Home (818) 701-5954
Cell (818) 294-3789

Begin forwarded message:

From: John Whitaker <johnwhitaker.home@gmail.com>**Date:** December 3, 2020 at 4:00:39 PM PST**To:** planning.liaison@lacity.org**Subject:** DTLA 2020 Program Feedback

Good Afternoon: I thought it was a well organized and presented program yesterday. One minor clarification comment and request:

I believe Brittany stated that the TFAR Ordinance was adopted in the late 80s and it was timely now to update the cost for TFAR. I was involved in drafting the amended TFAR Ordinance in 2007 which had as its main purpose the updating of the TFAR PBP requirement to make it float as property values changed. We went from a fixed assumed value for the land in the original TFAR Ordinance to one based on an arms length transaction within 18 months of the TFAR application or a current MAI appraisal of the land to which the previously agreed upon 40% formula would then be applied. Thus, I do not believe it is fair to justify throwing out the TFAR process on the basis that it does not take into consideration the increasing land values Downtown. It does do that and equally important it gives certainty to the developer/investor on day one as to what its TFAR costs will be. It is certainly appropriate in today's environment to prioritize

affordable housing as the most desired community benefit but that can be done without losing the benefit to the applicant of certainty up front which will not be subject to changes at CPC or City Council if the TFAR project needs to go there for final approval.

In the interest of full transparency, I think it would be helpful if we could see the consultant report upon which Planning will rely for its various affordable housing percentages after it is updated as was suggested in the program. I am working now with a Downtown developer to quantify the actual loss to the developer of providing affordable housing in its new high rise tower at each affordable threshold as determined by HCID LA. I believe our findings could be helpful to your consultant in creating realistic thresholds for all to follow and actually produce onsite affordable housing.

I would be more than pleased to discuss this further with any of you if you would like to do so. Thank you for your continued efforts to complete this tough but important task . John

John Whitaker
Home (818) 701-5954
Cell (818) 294-3789

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Brittany Arceneaux
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Cherry Yap <cherry.yap@lacity.org>

Fwd: frm: Dorothy Wong

Brittany Arceneaux <brittany.arceneaux@lacity.org>
 To: Cherry Yap <cherry.yap@lacity.org>, Jordan Hallman <jordan.hallman@lacity.org>

Fri, Dec 4, 2020 at 3:18 PM

----- Forwarded message -----

From: **Brittany Arceneaux** <brittany.arceneaux@lacity.org>
 Date: Wed, Nov 18, 2020 at 11:56 AM
 Subject: Re: frm: Dorothy Wong
 To: Dorothy Fue Wong <dorothyfuewong@me.com>
 Cc: King Cheung <kingcheung47@gmail.com>, dmltan <dmltan@aol.com>

Hi Dorothy,

Thank you for your comment. It has been received and filed.

We have several more events - they can be found [here](#).Best,
Brittany

On Wed, Nov 18, 2020 at 11:06 AM Dorothy Fue Wong <dorothyfuewong@me.com> wrote:

Brittany,
 I did not receive an email concerning the November 17th meeting.
 Is there another opportunity for a session like this?

I like to add information about the Legacy Businesses program (for Little Tokyo, Chinatown, and other ethnic communities). It is a program that the LA City Council is in the process of supporting. Curren Price's office is in charge of introducing this program —with support from Ken Bernstein from the City and the LA Conservancy.

Dorothy

Sent from my iPad

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Please note I am out of the office every other Friday.

12/7/20

Los Angeles City Planning Department

Attn: Brittany Arceneaux, City Planner, brittany.arceneaux@lacity.org

RE: Remarks to the Draft of the Downtown Community Plan Update via email

Dear Brittany,

As an Architect practicing in Los Angeles for 30 years, I have a few thoughts about the current drafts of the Downtown Community Plan Update and the recommendations for Recode LA 2040. The website states:

“Several years ago, City Planning set out to create a modern and efficient zoning system for Los Angeles. The proposed approach aims to establish a new Zoning Code that is more responsive to the needs of Los Angeles’s neighborhoods, in addition to being easier to use.”

Good goals, but the current drafts do not yet appear more responsive to local needs or streamlined enough to facilitate the goals. Broader evaluation, recharacterization and refinement can hopefully still occur.

The draft encourages specific distinction between neighborhoods and their current or perceived cultural affiliations. This distinction freezes a location in time and prohibits future evolution. This will result in the perpetuation of a fake architectural representation to gain city approval. Overly specific development standards create confusion and contradiction leading to increased reliance on interpretation from governing bodies. This will slow decisions and make approval times longer. For example, the draft prohibits balconies and non-flat rooflines in the Arts District because they’re deemed not reflective of the area. This is simplistic and out of step with current building stock. Balconies are a common residential element and meet market demand. Prescribing rooflines creates arbitrary limits on architectural expression. The “roofline” or “facade articulation” language is something I find throughout planning codes. The SNAP plan contains such language and I’ve seen hundreds of hours of consultant, Architect, and City staff time spent figuring out what can be done per the “language.” The level of interpretation and enforcement has varied over the years and continues to plague projects while not producing better results.

The current drafts for use and density are too specific and possibly costly. The Hybrid Industrial District has too many development standards that will cap interest in housing development because of the minimum unit size, material, and form requirements. The draft recommends uses for the interior of the building. These should all be reviewed and crafted to permit flexibility and change over time.

I believe the current draft needs further study and input from the design and development community prior to adoption. The draft analysis of the Downtown, Arts District, Little Tokyo, and Chinatown districts need to be reconsidered and not defined by transitory cultural associations, a form-based code, or by prescribed use requirements that will not evolve over time to reflect the community it serves. Los Angeles deserves a code that is appropriate and flexible while allowing for innovation and the economic realities needed for growth.

Sincerely,



Brian Lane, AIA, Principal, LEED AP

cc: Craig Weber craig.weber@lacity.org

Shana Michele Murphy Bonstin shana.bonstin@lacity.com

Will Wright will@aialosangeles.org

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January 13, 2020

BY EMAIL

Mr. Craig Weber
Principal City Planner & Division Head
Community Planning
Department of City Planning
200 N. Spring St
Los Angeles, CA 90012

Re: 670 Mesquit Project: Arts District Residential Uses under the Downtown
Community Plan Update

Dear Mr. Weber:

Thank you for the opportunity to offer further comment on the draft Downtown Community Plan. We write on behalf of our client, RCS VE LLC, which has proposed the 670 Mesquit Street project, which we summarized in our December 4, 2020, letter commenting on the Downtown Community Plan EIR. In this supplemental letter, we address further the draft plan's proposal to limit new residential uses to permanent supportive housing and live-work units rather than broadly permitting residential uses in the Arts District. In addition, we note additional points of consistency of the 670 Mesquit project with the draft Plan's goals.

670 Mesquit Street's design, as our prior letter explained, is fully consistent with the draft plan's goals. The 670 Mesquit Street project would include uses consistent with the existing neighborhood—a mix of creative office space, hotel rooms, general retail uses, restaurants, event and gallery space, a gym, and multi-family residential housing units. 16% of the residential units will be covenanted as affordable and built onsite pursuant to Measure JJJ. In addition, the 670 Mesquit Street project will generate over 5,200 net new employees.

Regarding the L.A. River, the project's consistency with the Plan's goals is also very apparent, as mentioned by the Gallo family in a separate letter. The Plan's proposed goal PO 8 provides for "connected infrastructure that respects and preserves diversified economic activities while enhancing recreational opportunities." In particular, the proposed multi-use deck over the railway property on the project's eastside and along the Los Angeles River achieves policies 8.1, "Maintain functional use of the rail facilities while allowing for bold and innovative design along properties adjacent to the River," 8.4, "Identify physical interventions, such as decking over rail lines that can improve connectivity and access to the River," and 8.4, "Integrate direct visual access to the River in building design and site planning in the form of paseos, plazas and open space facilities."

We write to address further the concerns about the restrictive provisions of the Industrial-Mixed 4 Use District that discourage housing, contrary to the City's overall goals and needs to incentivize all types of housing production. To the extent that the draft's limitations on residential uses is intended to ensure consistency between the new Plan and the General Plan Framework Element policies regarding industrial lands, we respectfully submit that there should be no such concern and that the Framework Element does not justify provisions in the draft plan that unnecessarily impede the development of all housing types in the Arts District.

As discussed further below, the proposed Industrial-Mixed 4 Use District also extends across properties such as 670 Mesquit that have never been designated by the City as industrial preservation zones.

A. Allowing Residential Uses in the Arts District Is Consistent With the Framework Element's Policies Regarding Industrial Uses

With regard to the Framework Element's industrial preservation policies, the chapter on economic development includes Objective 7.2, "Establish a balance of land uses that provides for commercial and industrial development which meets the needs of local residents, sustains economic growth, and assures maximum feasible environmental quality." We respectfully submit that this objective is best served by allowing all types of residential uses in the Arts District.

Corresponding industrial policies are consistent with eliminating the Arts District housing prohibition, which will help the City to "[r]etain the current manufacturing and industrial land use designations, consistent with other Framework Element policies, to provide adequate quantities of land for emerging industrial sectors" (Policy 7.2.8) and "limit the redesignation of existing industrial land to other land uses except in cases where such redesignation serves to mitigate existing land use conflicts, and where it meets the criteria spelled out in Policy 3.14.6 of Chapter 3: Land Use." (Policy 7.2.9.)

Policy 3.14.6 of Chapter 3 allows for the "re-designation of marginal industrial lands for alternative uses by amending the community plans based on the following criteria:

- a. Where it can be demonstrated that the existing parcelization precludes effective use for industrial or supporting functions and where there is no available method to assemble parcels into a unified site that will support viable industrial development;
- b. Where the size and/or the configuration of assembled parcels are insufficient to accommodate viable industrial development;
- c. Where the size, use, and/or configuration of the industrial parcels adversely impact adjacent residential neighborhoods;
- d. Where available infrastructure is inadequate and improvements are economically infeasible to support the needs of industrial uses;

- e. Where the conversion of industrial lands to an alternative use will not create a fragmented pattern of development and reduce the integrity and viability of existing industrial areas;
- f. Where the conversion of industrial lands to an alternative use will not result in an adverse impact on adjacent residential neighborhoods, commercial districts, or other land uses;
- g. Where it can be demonstrated that the reduction of industrial lands will not adversely impact the City's ability to accommodate sufficient industrial uses to provide jobs for the City's residents or incur adverse fiscal impacts; and/or
- h. Where existing industrial uses constitute a hazard to adjacent residential or natural areas.”

With respect to criteria a, b, d, and e, which pertain to the suitability of land to support industrial uses and redesignation's potential to adversely affect the viability of existing industrial uses, the Arts District neighborhood already includes residential units in both new buildings and older adaptive reuse buildings, as discussed above. Therefore, permitting residential uses in the Arts District would not adversely affect the ability of existing industrial land uses to continue operations. Nor would the introduction of additional residential uses preclude further industrial development, which must already account for residential proximity.

Regarding criteria c, f, and h, which pertain to impacts to adjacent residential neighborhoods and commercial districts, prohibiting continued housing development in the Arts District would be an adverse impact to Arts District residents and businesses and those of surrounding neighborhoods. As more residents, businesses, and residents relocate to and visitors spend time in the Arts District, allowing projects to include residential uses would support surrounding residential neighborhoods and commercial districts through the introduction of additional residents along with corresponding public infrastructure, services, and amenities. Allowing residential uses in the Arts District would be consistent with the ongoing transformation of the neighborhood into a distinctive mixed-use community serving the growing downtown residential population, through redevelopment and adaptive reuse.

Regarding criterion g, allowing residential uses in the Arts District would support the City's ability to accommodate sufficient industrial uses to provide jobs for the City's residents and would have positive fiscal impacts. Limiting residential density in the Arts District tends to create more pressure to redevelop all available properties, whereas greater density allows housing needs to be met through the redevelopment of fewer properties. Therefore, increasing residential density in the Arts District may promote the retention of existing industrial uses.

In fact, while the Framework Element calls for the establishment of “priority areas” within Los Angeles called Industrial Preservation Zones (see Los Angeles Municipal Code Chapter 22.60), the 670 Mesquit Street project site and surrounding properties are *not* zoned for Industrial Preservation. Therefore, the City has already determined that to the extent certain

industrial lands warrant preservation through its zoning code, it has not bestowed such protection on these Arts District properties.

B. Inconsistencies Within the General Plan or Its Framework Element Are Not Created by Allowing Residential Uses In The Arts District

Eliminating limitations to allow a full suite of residential uses in the Arts District is the approach most consistent with the General Plan.

The evolving and expanding Arts District is already seeing a transition of land uses. In an area historically characterized by warehouse and “industrial” uses, the Arts District is now comprised of a diversity of land uses that includes creative office, incubator spaces, artist production spaces, retail and restaurant uses, and residential units in both new buildings and older adaptive reuse buildings.

New residential uses include the Molino Street Lofts at 500 S. Molino Street, the One Santa Fe mixed-use project which contains 439 residential units, 510 S. Hewitt Street, 950 East 3rd Street, 1855 E. Industrial Street which contains 119 residential units, the Biscuit Company Lofts at 1850 E. Industrial Street which contain 104 residential units, the 2121 Lofts at 2135 7th Street which contain 78 residential units, the AMP Lofts project at 2057 E. 7th Street, and the Artist Lofts DTLA at 688 S. Santa Fe Avenue.

The Downtown Community Plan should recognize and encourage this ongoing evolution, not seek to stifle it. There is a critical need for new housing in the City. The plan should support that housing where it is already organically occurring. Allowing all types of residential uses in the Arts District would be consistent and compatible with the recent pattern of development and expansion of residential uses in the area.

Encouraging residential development would be consistent with many General Plan Framework Element Objectives, including the following.

- Objective 3.4, “Encourage new multi-family residential, retail commercial, and office development in the City’s neighborhood districts, community, regional, and downtown centers as well as along primary transit corridors/boulevards, while at the same time conserving existing neighborhoods and related districts.”
- Objective 3.7, “Provide for the stability and enhancement of multi-family residential neighborhoods and allow for growth in areas where there is sufficient public infrastructure and services and the residents’ quality of life can be maintained or improved.”
- Objective 4.4, “Reduce regulatory and procedural barriers to increase housing production and capacity in appropriate locations.”
- Objective 7.9, “Ensure that the available range of housing opportunities is sufficient, in terms of location, concentration, type, size, price/rent range, access

to local services and access to transportation, to accommodate future population growth and to enable a reasonable portion of the City's work force to both live and work in the City.”

C. Residential Uses Should Be Encouraged Around Planned Mass Transit

Metro proposes a substantial investment in the Arts District. Metro is studying a proposed new heavy rail station near 6th Street that would serve the Arts District and surrounding neighborhoods. In June 2018, Metro’s Board of Directors approved a funding agreement with the City of Los Angeles to fund pre-design, public outreach, and the Arts District / 6th Street Station EIR. Metro anticipates completing the EIR in late 2021. Given this, all types of residential uses should be permitted and encouraged.

Limiting residential uses proximate to this significant planned transit investment is inconsistent with General Plan Framework Element Objectives to focus residential uses around urban transit stations. (See Objective 3.15 [“Focus mixed commercial/residential uses, neighborhood-oriented retail, employment opportunities, and civic and quasi-public uses around urban transit stations, while protecting and preserving surrounding low-density neighborhoods from the encroachment of incompatible land uses.”]; Objective 4.2, “Encourage the location of new multi-family housing development to occur in proximity to transit stations, along some transit corridors, and within some high activity areas with adequate transitions and buffers between higher-density developments and surrounding lower-density residential neighborhoods.”].)

* * * * *

We look forward to working with the City on the Downtown Community Plan update and in its consideration of the 670 Mesquit Street project. To emphasize the issues addressed in this letter and our prior correspondence, we request the following:

(1) Restoration of the October 2019’s draft’s recommended zoning for the 670 Mesquit project site;

(2) Application of the Transit Core land use designation to the area within one-half mile from the planned Arts District / 6th Street Station;

(3) Elimination of the provisions of the Industrial-Mixed 4 Use District that discourage housing; and

(4) Incorporation of language into the draft plan allowing the Director of Planning to permit projects to develop floor area beyond base levels for large projects with specific plans.

LATHAM & WATKINS LLP

Thank you for your time and your consideration of these issues. We would be happy to discuss them with you further.

Very truly yours,



Benjamin J. Hanelin
of LATHAM & WATKINS LLP

cc: Mr. Michael LoGrande
Mr. Frank Gallo
Mr. Zach Vella
Cindy Starrett, Esq.
Derek Galey, Esq.



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Danielle Wildkress
Brilliant Corners

Lee Raagas
Chief Executive Officer

November 11, 2020

Vince Bertoni
Director of Department of City Planning
City of Los Angeles
200 N. Spring Street, Suite 525
Los Angeles, CA 90012

Re: Central City and Central City North Community Plan Update & Environmental Impact Report (“EIR”) Response Letter

Dear Mr. Bertoni,

Thank you for the opportunity to engage in the process and allowing for the mechanism to communicate Skid Row Housing Trust’s (“the Trust”) perspective and position. The Executive Leadership Team and the Board of Directors of the Organization submit this letter in response to the *DRAFT* Central City and Central City North Community Plan and EIR.

Since 1989, the Trust has been committed to solving homelessness and improving the health and safety of all community members in Los Angeles. The Organization has done this by providing permanent supportive housing (“PSH”) along with wrap around services in the County’s most impoverished neighborhood, Skid Row. The Trust builds and operates beautifully designed, high quality housing projects that serve as neighborhood anchors. We offer 1,897 apartment homes to the people who need them most. The Trust is one of the largest property owners and operators of PSH in Los Angeles with 25 of 27 total buildings in our portfolio located in the Industrial District, Arts District, Historic Core, Toy District, Fashion District, and South Park. The Organization has been headquartered in the Industrial District at E. 7th Street and S. Central Avenue for 30 years. We serve the mission to end homelessness and advocate for equitable and inclusive housing for all.

The Trust is grateful for the diligence and work put into the *DRAFT* community plan by LADCP and staff. The Trust also supports the draft community plan but appreciates the opportunity to offer suggestions to make it more consistent with the City's historic and continuing values to achieve equity, diversity, and inclusivity while trying to fill the deep deficit for housing needs while creating economic opportunities to the Community as a whole. Please find the following bullets outlining key perspectives on this important issue:

- Skid Row Housing Trust supports the provisions to require affordable housing as a prerequisite to development incentives to produce much needed affordable housing and distribute them all across DTLA. The opportunity for mixed income, mixed use, and mixed housing should apply to all parts of downtown where housing is allowed.
- Skid Row Housing Trust strongly opposes only allowing 100% affordable housing in Skid Row where we have the highest concentration of poverty. Further concentrating and perpetuating poverty is neither equitable, diverse, nor inclusive. The Organization advocates for a mixed income, mixed use, and mixed housing in Skid Row and oppose this proposed exclusionary zoning policy. We suggest allowing all types of housing in the Industrial District similar to the Industrial-Mixed Hybrid zone proposed in the Fashion District.
- Skid Row Housing Trust supports the inclusion of PSH in the Arts District but opposes the restrictions on other housing types. The current draft only allows live/work units with minimum 1,000 square footage, average size in Type I, II, and IV construction types. On the west side of Alameda in Skid Row, the community plan proposal results in a long term economically poor community. On the east side of Alameda in the Arts District, only large units with more expensive construction types are allowed. This is an exclusionary policy that will inadvertently create an affluent community lacking economic diversity and limits housing appropriate for families, further exacerbating the issues of equity, diversity, and inclusivity against the intended values of the community plan. The Organization suggests allowing all types of housing in the Arts District where housing is allowed similar to the Fashion District.
- Skid Row Housing Trust suggests adding further incentives for developments that can enhance safety and activity on 6th and 7th Street corridors through Skid Row (from Los Angeles Street to the west to Alameda Street to the east). By offering a higher level and larger incentives, these corridors can potentially better connect the Financial District, Historic Core, and the Arts District and are all are critical to contribute to Skid Row's opportunity to be part of the renaissance of DTLA. Incentives that help diversify the land use conversions



along these corridors and bring essential goods and services back into a community that is devoid of diversity, support, and the fundamental building blocks of a complete community.

- Lastly, the Organization suggests LADCP reconsider land uses adjacent to existing and future transit routes on 7th Street and Alameda Street and designate them as Transit Core. These are areas that support and facilitate high public tax dollar investments and should allow for more opportunities for housing production. This area should receive the same consideration as Transit Core with removal of development hurdles such as minimum parking requirements. The Trust is focused on ending homelessness through a multi-pronged approach, the primary being development and building of PSH units. However, the Organization advocates to prevent individuals and families from falling into homelessness in the first place which is possible with more diverse housing options. Los Angeles and Skid Row along with downtown Community members need more housing. The community plan should assimilate all perspectives and integrate many different opportunities for a holistic benefit. There is a significant risk that would be an opportunity lost if this plan does not put more housing near transit.

The Trust is currently developing more than 1,000 new homes and will continue to build thousands more to end homelessness. To make this possible, we need pro-housing policies and rules in place to produce more housing at a lower cost with significantly improved speed to build. California is 49th in housing production per capita. The upcoming *Housing Element* shows for the next eight (8) years, LA calls for more than 460,000 units of new homes to meet the housing needs in City of Los Angeles alone. Central City and Central City North Community Plan update is a prime opportunity to address the housing crisis while simultaneously bringing awareness and solutions to the inequities in housing access and economic opportunities. We applaud the efforts by LADCP and its staff to implement a vision for an equitable, diverse, and inclusive plan for the next 20 years in our DTLA community. There are many positive changes in the current draft community plan but Skid Row Housing Trust believes it can be further improved by exploring and implementing the above suggested recommendations and/or changes. Without these changes, the city will be implementing exclusionary zoning policies Skid Row and Arts District and squandering potential opportunities for more housing near existing and future transit.

We respectfully request that the City more fully evaluate in the EIR the social and economic impacts associated with restrictive zoning that limits market rate and other development in Skid Row and conversely limits the type of housing and restrictions on PSA in the Arts District. The City should consider Project alternatives and additional



mitigation measures that more fully address the adverse environmental, social, and economic impacts of restrictive zoning on housing types in Skid Row and the Arts District.

Thank you for the opportunity to comment on the Draft Central City and Central City North Community Plans and look forward to your responses.

Sincerely,

A handwritten signature in blue ink, consisting of several loops and a trailing line.

Simon Ha, AIA
Chairman of the Board of Directors
Skid Row Housing Trust

cc:

Kevin De León, LA City Council District 14
Samantha Millman, LA City Planning Commission
Craig Weber, LADCP
Brittany Arceneaux, LADCP
Valerie Watson, LADCP
Lee Raagas, Skid Row Housing Trust
Sierra Atilano, Skid Row Housing Trust
Antonio Le Mons, Skid Row Housing Trust



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More

ACTION ALERT: Comment on DTLA 2040 Community Plan Draft

1004

~~1000-1010~~ MAPLE AVENUE



My family has owned property in DTLA at (insert address here) for ~~XX~~ years. As a longtime stakeholder in our downtown community, ~~I~~^{we} share the City's vision, as articulated in the draft Plan, to "...promote a dynamic, healthy, and sustainable Downtown core that is well connected to and supports the City of Los Angeles and the region."

We appreciate the City's Planning Department working closely with our downtown Districts, local business and property owners, and the community to address many of our concerns in the latest draft Plan.

While ~~we~~ support most of the revised draft Plan (November 2020), ~~I~~^{we} want to submit the following specific concerns and requests for changes to the City for review and consideration:

- Remove restrictions on new housing
- Increase minimum floor area ratios
- Allow hotels in the IX2 Use District
- Increase building heights
- Ensure COVID pandemic related flexibility
- Allow market rate housing in the Central City East area
- Adopt DEIR Alternative #3 to address the ongoing housing crisis and SCAH RHNA mandates
- Make the Community Benefits Program more financially feasible

Each of these items is further explained and expanded upon in the LA Fashion District's Response Letter for you to reference.

Thank you for your consideration on these important items. I/We look forward to further refinements of the visionary DTLA 2040 Plan.

further refinements of the visionary DTLA 2040 Plan

Sincerely,

H. Glaser

address to: BRITANY ARCENEAUX

- *brittany.arceaux@lacity.org*
- *craig.weber@lacity.org*



December 8, 2020

Los Angeles City Planning
Attn: Brittany Arceneaux, City Planner

RE: Remarks to the Draft of the Downtown Community Plan Update

Dear Ms. Arceneaux,

I write in support of Joey Shimoda's letter to you regarding the new code proposal. As an architect who has also been building within the City of Los Angeles for 29 years now, I would like to express my concerns about the current draft of the Downtown Community Plan Update and the Code recommendations for Recode LA 2040.

I am frankly alarmed at the arbitrary nature of the design constraints illustrated, and the lack of foresight or indeed concern about their impacts on the two important players in the urban development scene: meaning developers and architects.

Urban redevelopment hinges on the financial viability of projects which are always by nature risky. To the extent that a city places financial burdens on a project, development will move to where it is easier to build. Of course this is nothing new, but a good city will target what is essential to preserving or extending the 'urban vitality' of a place. This is more critical than attempting to preserve 'character', which could lead to sterility or urban atrophy as development has been driven away. And indeed in the case of current code proposals, even 'character' is not being preserved or extended, since the area has never been a homogenous precinct.

There are numerous misconceptions embedded in this code proposal. Perhaps the most egregious of these guidelines prohibits balconies, which are not only a code requirement for multi-family housing in almost all California jurisdictions, but an absolutely essential connection to the outdoors for apartment living. Seriously?

Required vertical and horizontal bands on buildings? Horizontal sliding windows banned? What century do we live in? The level of urban conversation here is extraordinarily mundane. And mundanity cannot be a goal of urban redevelopment. The building images used in the code are consistently dull and ordinary, with no memorable features. Is this the city of the future?

Please engage a suitable quorum of experts, meaning architects and developer clients to rethink these proposals. This is really not worthy of one of the world's greatest cities and could have seriously negative impacts on the future vitality of downtown Los Angeles – the very opposite of what must be intended.

Sincerely,

Clive Wilkinson FAIA, RIBA, FIIDA
President and Design Director

cc: Craig Weber craig.weber@lacity.org
Shana Michele Murphy Bonstin shana.bonstin@lacity.com
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January 14, 2021

Craig Weber
Principal City Planner
Los Angeles Department of City Planning
200 N. Spring St., Room 667
Los Angeles, CA 90012
Sent by Email: downtownplan@lacity.org

RE: Downtown Los Angeles Community Plan Update and New Zoning Code
Public Hearing Draft: Metro Comments

Dear Mr. Weber:

Thank you for coordinating with the Los Angeles County Metropolitan Transportation Authority (Metro) regarding the Downtown Los Angeles Community Plan Update (Plan) and associated new Zoning Code (Zoning Code) located in the City of Los Angeles (City). Metro's mission is to provide a world-class transportation system that enhances quality of life for all who live, work, and play within Los Angeles County. As the County's mass transportation planner, builder and operator, Metro is constantly working to deliver a regional system that supports increased transportation options and associated benefits, such as improved mobility options, air quality, health and safety, and access to opportunities.

The purpose of this letter is to provide Metro's comments on the Plan and identify topics for future discussion and consideration. Metro fully supports the core principles and objectives of the Plan, which will reflect a future vision for Downtown Los Angeles and are intended to guide development through the year 2040. Metro recognizes the Plan's significance to the City and the greater Los Angeles County region and is proud to support the Plan's development through our Transit Oriented Development Planning Grant Program. The Plan will further Metro's Transit Oriented Communities (TOC) goals for transit-supportive developments and places that grow ridership, reduce driving, and promote walkable neighborhoods. Metro and the City have been collaborating closely on many efforts in the Plan area, including major capital projects such as the Regional Connector Project and West Santa Ana Branch Corridor, the Union Station Master Plan, the NextGen Bus Plan, and facilities to support active transportation and shared mobility.

Below, we provide general comments on selected subjects of the Plan. Additional technical comments and background information are provided in the attachments to this letter.

Project Description Summary

The Plan area will combine the geographies of two Community Plan Areas: the Central City Community Plan and the Central City North Community Plan. The Central City Community Plan area is bounded on the north by Sunset Boulevard/Cesar Chavez Avenue, on the south by the Santa Monica Freeway (Interstate 10), on the west by the Harbor Freeway (Interstate 110), and on the east by Alameda Street. Immediately to the east of Alameda Street is the Central City North Community Plan Area, which encompasses approximately 2,005 acres and is generally bounded on the north by Stadium Way, Lilac Terrace, and North Broadway, on the south by the City of Vernon, on the west by Alameda Street, and on the east by the Los Angeles River. The Plan Update effort includes updates to the Central City and Central City North Community Plans, adoption of the New Zoning Code within the Plan area, and the adoption of necessary revisions and any other amendments necessary to implement the above.

Comments

Transit Priority Areas

Metro encourages the City to continue providing for additional density for developments surrounding major transit stops which should include, without limitation, high-frequency bus stops and Metro Rail stations (as currently defined in the City's Transit Oriented Communities Affordable Housing Incentive Guidelines). Metro's NextGen Bus Plan should be used as a resource to determine the location of high-frequency bus stops within the Plan area. For more information, visit the NextGen Bus Plan's website at <https://www.metro.net/projects/nextgen/>. In addition, the Plan should include stations for all rail lines that are existing and under construction. For planned rail lines, the Plan and Zoning Code (including maps) should be updated when Metro approves a Locally Preferred Alternative alignment. Please refer to Metro's 2020 Long Range Transportation Plan and Measure M Expenditure Plan.

Community Benefits Program

Metro commends the City's efforts to promote affordable housing, open space, and community-facilities through the proposed Community Benefits Program (CBP). **Metro requests that the City include facilities that support transit and active transportation ("transit-supportive infrastructure") as a category of menu items that qualify for Level 2 benefits under the CBP.** Such facilities can include, without limitation: transit stations; access improvements to transit stations (such as new entrances to above-ground rail stations or portals to underground rail stations, where technically feasible); enhanced bus stops; protected bike lanes; and improved sidewalks and crosswalks. Both on-site and off-site improvements should be considered for inclusion. The implementation of off-site improvements would require close coordination with key departments and agencies (including LADOT, BOE, StreetsLA, and Metro). Incentivizing transit-supportive infrastructure furthers the Plan's mobility goals and better integrates new development with transit, bike, and pedestrian networks. Other major cities such as New York City have similar incentive structures that support and enhance their transit systems.

Public Use Districts

Metro respectfully requests that lands in the Public Use District (P1) allow for a range of uses and standards equivalent to the least restrictive adjoining Use District (rather than of the most restrictive adjoining Use District). As currently drafted, Section 5C.2.5 of the proposed Zoning Code restricts many of Metro's properties from allowing residential or commercial development due to adjoining zoning. Metro's Joint Development program provides much-needed affordable housing and community-serving

commercial space that often is integrated into transit facilities. This amendment would still allow for development that is consistent with its surrounding context while minimizing the need for discretionary approvals.

In addition, we note that the description for the Public Facilities General Plan land use designation states that “Housing is not typically associated with Public Facilities but may be permitted on a limited basis” (Plan p. 13). **Metro respectfully requests that this sentence be clarified to more affirmatively allow for housing, either for all Public Facilities lands or specifically for Metro-owned properties (under a sub-designation similar to the one for Freeways on Caltrans-owned lands).**

Alameda District Specific Plan (ADP)

It is our understanding that Specific Plans within the Plan area will be revised or amended, subsequent to the Plan’s adoption. Metro looks forward to collaborating with and supporting the City’s future efforts to update the Alameda District Specific Plan (ADP) to leverage Los Angeles Union Station as a transit-rich resource that promotes a compact, equitable, sustainable, and walkable world-class transit supportive area.

Mobility

Metro commends the Plan’s mode share goal of 75% for transit, walking, and biking for the year 2040 (Policy MC 2.1). To support this goal, Metro recommends policies that call for the systematic implementation of transit-related and first-last mile improvements as new Metro transit projects are approved and built (including the Regional Connector and the West Santa Ana Branch corridor project). These can include periodic updates to the Plan and to LADOT’s Capital Improvement Plan. The Plan should account for Metro’s planned projects as described in Metro’s 2020 Long Range Transportation Plan and Measure M Expenditure Plan.

Metro supports the implementation of the LADOT Mobility Hubs program in the Downtown area to provide transportation options and promote multimodal trips. Metro will continue to serve in a liaison role to facilitate the development of Mobility Hubs in strategic locations, such as near transit and active transportation infrastructure.

Parking Policies

Metro commends the Plan’s efforts to set up an efficient parking system that encourages non-vehicular travel and serve the needs of a range of users (MC Goal 6 and MC Policies 6.1-6.7). In particular, the elimination of parking minimums, the unbundling of parking in property costs, and the inclusion of parking area in floor area allowances are important and effective policy tools in supporting the Plan’s goals for sustainability, mobility and urban design, and housing affordability.

To further promote a more robust and successful parking policy, Metro strongly encourages the City to consider parking maximums. In areas that have high congestion but are also rich in transit access, parking maximums provide a more effective policy signal for “transit-first” mobility and preventing over-parking in the Plan area. **Also, the Zoning Code’s definition of floor area should include auto parking areas.** Additional discussion and resources pertaining to parking policies are provided in Attachment A.

Downtown Los Angeles Community Plan Update
Public Hearing Draft – Metro Comments
January 14, 2021

In addition to comments contained within the body of this letter, **Attachment B contains specific technical comments pertaining to the Plan text and maps.**

Metro looks forward to continued collaboration with the City on the Plan. Should you or your team have any questions or would like to discuss contents in this letter, please contact Shine Ling, Transportation Planning Manager (lings@metro.net).

Sincerely,

A handwritten signature in black ink, appearing to read "Nick Saponara", followed by a horizontal line.

Nick Saponara
Executive Officer
Transit Oriented Communities

Attachments:

- A. Parking Requirements – Recommendations and Supplemental Information
- B. Other Technical Comments
- C. Nelson/Nygaard Parking Memo

ATTACHMENT A
Parking Requirements – Recommendations and Supplemental Information

1. Implement parking maximums in Downtown Los Angeles:

- **Benefits:**
 - Downtown Los Angeles is well-suited for implementing a policy of parking maximums. It has a concentration of dense, walkable neighborhoods and high-quality, high-frequency transit options that is unparalleled in the Southern California region. A parking maximum would prevent over-parked development, which will bolster transit ridership, improve pedestrian safety, and promote environmental sustainability through reduced emissions, and traffic congestion. It will decrease the overall cost of housing. It will also aid in preserving historic buildings by ending the parking “arms race” between new development and older ones that took advantage of the Adaptive Reuse Ordinance.

- **The need for maximums:** In highly congested areas, parking maximums provide a more effective tool to discourage over-parking in new development. Eliminating parking minimums, while an important step, are not sufficient to achieve the desired goals and benefits of limiting overall parking supply.
 - A study of City of Los Angeles building permit data found that a large share (42%) of approved residential and mixed-use developments built 10% or more parking spaces than required by the binding parking minimum (Stangl 2019, p. 20).
 - A study completed for Metro by a national transportation planning and research firm has shown that on average, transit-oriented developments nationwide are over-parked by 30%, i.e., only 70% of the parking lot is in demand (Marsden 2014; Nelson/Nygaard 2020).
 - Some projects that qualify for Tier 3 or Tier 4 status in the TOC Affordable Housing Incentive Guidelines (TOC Guidelines) have taken advantage of reduced parking requirements. These projects are in close proximity to transit and can provide less than 1 space per residential unit, yet often end up building 1 to 2 spaces per unit. (See Stangl 2019, p. 21.)

- **Setting the maximum:**
 - The simplest method is to set the maximum at the same level as the existing parking minimum. This sends a clear signal that parking will be capped at what was previously required of a development project (Shoup 2018, p. 16).
 - Many cities in United States and elsewhere have implemented parking maximums, including Denver, New York City, San Francisco, Seattle, and London. (Hanson et al., n.d.; Manville et al. 2014; Shoup 2018). Alternatively, Philadelphia and Boston have adopted

different types of cap-and-trade programs for on-street and off-street parking spaces (Geeting 2014; City of Boston 2021).

- As most of the Plan area is rich in transit options, we recommend that maximums be set for all of the Plan area (except possibly for lands with the “Production” land use designation).
- Alignment with Metro policies: Parking maximums are a recommended strategy in Metro’s Transit Supportive Planning Toolkit. Metro also expects to include parking maximums in its Joint Development Policy, setting an example for other transit-oriented developments. Implementing a parking maximum will align the City’s policies with Metro’s policy direction.

2. Include parking areas in floor area allowances:

- Metro recommends that the Zoning Code include automobile parking areas in the definition of Floor Area (Zoning Code section 14.1.7). This will aid in discouraging over-parked development, reduce the size of above-ground parking podiums and improve the quality of urban design and the pedestrian experience.

References and Resources

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City of Boston. (2021). Parking freezes. <https://www.boston.gov/departments/environment/air-pollution-control-commission/parking-freezes>

Geeting, J. (2014). It’s time to cap-and-trade parking permits. *NextCity*, January 28, 2014. <https://nextcity.org/daily/entry/its-time-to-cap-and-trade-parking-permits>

Hanson, B. (n.d.). *Parking Maximums*. Sustainable Development Code. Retrieved January 5, 2021, from <https://sustainablecitycode.org/brief/parking-maximums-7/>

Mardsen, G. (2014). *Parking: Issues and Policies* (S. Ison & C. Mulley, Eds.; Vol. 5). Emerald Group P. <http://imentaraddod.com/wp-content/uploads/2017/07/622-Parking-Issues-and-Policies-Transport-and-SustainabilityStephen-G.-Ison-Stephen-G.-Ison-.pdf>

Nelson/Nygaard Consulting Associates. (2020). Memorandum to LA Metro: District NoHo - Parking Allocation Assessment (see Attachment C to this letter).

Shoup, D. (2018). *Parking and The City*. New York: Routledge.

Stangl, K. (2019). *Parking? Lots! Parking Over the Minimum in City of Los Angeles* [Comprehensive Project]. University of California, Los Angeles. <https://escholarship.org/uc/item/8zb447g4>

ATTACHMENT B Other Technical Comments

Plan Text

- MC Policy 4.4 should be made more specific to emphasize access and linkages to transit, including safe biking infrastructure near transit facilities, as well as secure parking and bikeshare.
- MC Goal 8 (An Efficient Goods Movement System That Supports Economic Activity Downtown) should consider including recommendations for smaller trucks for delivery/cargo purposes in the Plan area, as larger trucks have significant pedestrian/cyclist blind spots.
- Mobility/Union Station: Study if specific policies or projects/implementation actions in Metro's *Connect US Action Plan* can be referenced in the Plan.
- PO Policy 8.4: Decking projects over rail tracks need to be carefully studied and coordinated with affected train companies (e.g. Amtrak, BNSF, Metro). Recommend clarifying policy.
- Implementation Action P11 (LA River Way): Include reference to Metro as an implementing agency. See Metro's Los Angeles River Path Project for additional information (<https://www.metro.net/projects/lariverpath>).
- Implementation Actions – Agency Acronyms – Edit Metro's name to reference "Los Angeles County Metropolitan Transportation Authority".

Land Use Designation Map

- Update to show recent changes to "Existing bicycle facilities map", including recently installed upgrades to protected lanes on 6th St, 7th St, Main, Grand, and Figueroa.

Metro - Recently adopted plans

Please be advised that Metro has recently adopted the following policy documents, which should be reviewed and referenced, as appropriate, in the Plan:

- 2020 Long Range Transportation Plan (<https://www.metro.net/projects/lrtp/>)
- Transit Oriented Communities Policy (http://media.metro.net/projects_studies/joint_development/images/toc_policy_final.pdf)
- Transit Oriented Communities Implementation Plan (<https://media.metro.net/2020/Metro-TOC-Implementation-Plan-Final.pdf>)
- Transfers Design Guide (http://media.metro.net/projects_studies/toc/images/Metro_Transfers_Design_Guide_2018-0312.pdf)



MEMORANDUM

To: LA Metro
 From: Nelson\Nygaard Consulting Associates
 Date: October 8, 2020
 Subject: District NoHo – Parking Allocation Assessment

Introduction

This memorandum provides a high-level review of demand and utilization for commercial and residential parking spaces in transit-adjacent developments comparable to the proposed District NoHo Joint Development project. Located at the North Hollywood B Line (Red) and G Line (Orange) Station, the project is currently well-served by a combination of underground heavy rail, bus rapid transit, and local and regional bus services. Our assessment evaluates the current literature on transit proximity and travel behavior and compares the project location and the extent of transit service currently provided with parking demand and supply in comparable contexts. The assessment finds high rates of unutilized, built parking among comparable transit-adjacent developments, many of which are not as dense or well-served by transit as District NoHo.

Project Location

District NoHo is located at the of the intersection of Lankershim and Chandler Boulevards in the North Hollywood neighborhood of Los Angeles. The site is currently developed with surface parking and is occasionally used for construction staging and film rentals. The site is at the North Hollywood Metro Station which is the intersection of the Metro B Line (Red) heavy rail and Metro G Line (Orange) bus rapid transit as well as several local and regional bus lines. North Hollywood is Metro’s third busiest station with over 28,000 daily boardings. The surrounding neighborhood is the NoHo Arts District which includes many restaurants, shops, art spaces and theaters. District NoHo will build on and realize decades of planning for intensive mixed-use development surrounding the Station. Robust transit service is available from the site, which allows commuters and residents regionwide access from the immediately adjacent Station.

Figure 1 District NoHo Access to Regional Destinations

Transit Route	Destination Access Provided by Route
Metro B Line (Red)	North Hollywood – Downtown LA
Metro G Line (Orange)	Chatsworth – North Hollywood
152 (Metro)	North Hollywood - Calabasas
183 (Metro)	Sherman Oaks - Glendale
237 (Metro)	San Fernando - Hollywood
224 (Metro)	Arleta – Universal Studios
656 (Metro)	San Fernando - Hollywood
549 (DASH)	Encino - Pasadena
154 (Metro)	Tarzana - Burbank
162 (Metro)	West Hills - Burbank
501 (Metro)	North Hollywood - Pasadena

Project Program

District NoHo will redevelop nearly 16 acres of land currently dedicated to parking and vacant land use with 1.5 million square feet of residential uses comprised of 1,200 market rate units and 300 affordable residential units. It will add 100,000 square feet of retail/restaurant uses, and up to 600,000 square feet of office space. In addition, District NoHo will provide a 1.5 acre park as the centerpiece of the district. The proposed uses would be located within several buildings on multiple blocks ranging in height from one to 28 stories. The uses are proposed to be supported by up to 3,313 vehicle parking spaces and up to 1,167 bicycle parking spaces, as well as up to 750 Metro patron vehicle parking spaces and 166 Metro Bike Hub bicycle parking spaces.

District NoHo proposes a 22-story, 281-foot-tall office building (“Block 8”) with 360,000 square feet of non-residential, non-parking uses. 1,174 parking spaces are distributed among ten garage levels: four subterranean (642 spaces including tandem), one at-grade (36 spaces) and five above-grade (496 spaces). This represents a **parking ratio of about 3.2 spaces per 1,000 square feet of gross leasable area**. Assuming a per-stall cost of \$45,000 the total cost of all proposed parking at build would equal approximately \$52.8 million.

Transit Proximity and Parking Demand

The transportation field has generated a substantial amount of literature on the effects of transit proximity, destination accessibility, and TDM on travel behavior. Evidence suggests that the existence of each of these factors influences a person's decision to use transportation modes other than driving alone, leading to a reduction in vehicle trips. . Additionally, this study surveyed other California and West Coast cities to provide additional context on parking policies and conditions surrounding transit adjacent development. The contextual similarities of the selected regions include access to transit, built environment, socio-cultural car dependency, and transit-oriented development policy implementation.

Commercial Development

When applied to commercial development, a reduction in vehicle trips correlates closely with a reduction in parking demand; if employees are not driving to work, they have no need for parking. Proximity to transit alone does not typically reduce vehicle trips in and of itself; proximity to *high-quality, high-frequency* transit that provides *connections to regional destinations* is key to vehicle trip reduction. District NoHo will benefit from such high-quality, high-frequency transit as explained in the table above. Several key academic studies have established a clear relationship between proximity to transit stations and employee transit mode shares: **offices located closest to high-frequency transit stations tend to feature the highest transit mode shares and the lowest rates of parking demand.** When transit is easily accessible, generally within one-quarter to one-third of a mile or a five to eight-minute walk, transit service is a more viable commute option for people and is more competitive with private vehicles in terms of travel time.¹

Several studies on the effects of transit proximity in California have found that ***office workers in transit-oriented locations were between 2.7² and 3.5³ times more likely to commute by transit than those working in contexts that were less transit-oriented.*** A national review of travel behavior literature published between 1996 and 2009 found a similar statistically significant link between transit proximity and higher rates of transit and walk commuting, where a 1% decrease in the distance to transit is associated with a 0.29% increase in transit use.⁴

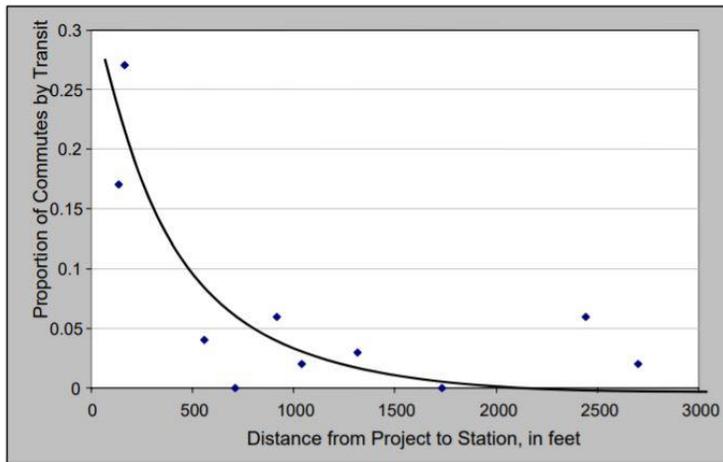
¹ Cervero, Robert. 1993. "Ridership Impacts of Transit-Focused Development in California." UCTC 176. Berkeley, CA: University of California Transportation Center. <http://citeseerx.ist.psu.edu/viewdoc/download?doi=10.1.1.294.2295&rep=rep1&type=pdf>

² Cervero, Robert. 2006. "Office Development, Rail Transit, and Commuting Choices." *Journal of Public Transportation* 9 (5). <https://trid.trb.org/view/803172>.

³ Lund, Hollie, Robert Cervero, and Richard Willson. 2004n.d. "Travel Characteristics of Transit-Oriented Development in California." Caltrans, Statewide Planning Studies FTA Section 5313 (b). https://www.bart.gov/sites/default/files/docs/Travel_of_TOD.pdf.

⁴ Ewing, Reid, and Robert Cervero. 2010. "Travel and the Built Environment." *Journal of the American Planning Association* 76 (3): 265–94. <https://doi.org/10.1080/01944361003766766>. P. 274

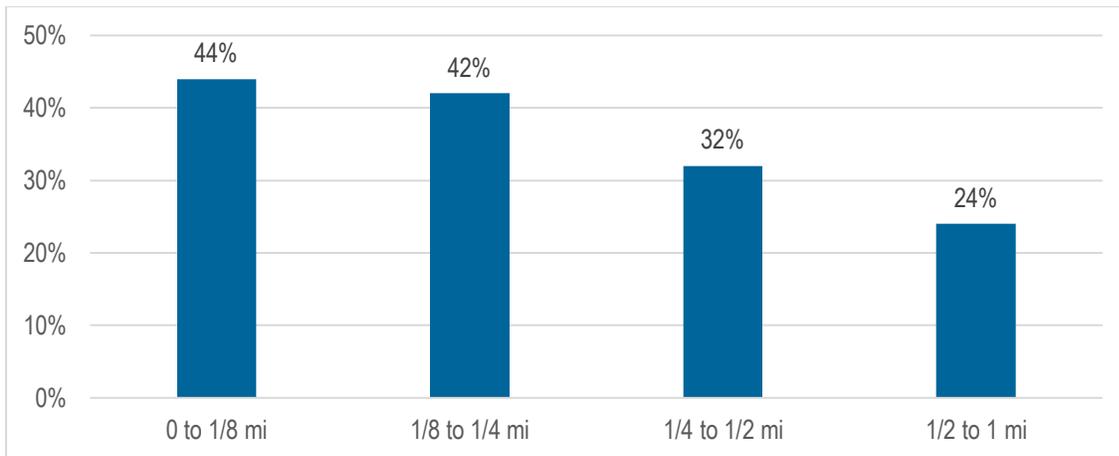
Figure 2 Ridership Gradient: Transit Share as a Function of Distance of Office Site to Nearest Station in California



Source: Travel Characteristics of Transit-Oriented Development in California

Research from the suburbs of Toronto (Figure 2 below) found that transit commute share increased with greater proximity to transit stations. Transit was the dominant mode for commuting to destinations within approximately 1/4 mile of a transit station.⁵ Projects within 1/8 of a mile of transit stations were associated with nearly twice as much transit use as projects located between 1/2 and 1 mile from stations. District NoHo, being immediately adjacent to high-quality, high-frequency transit, can expect to see the maximum mode shift similar to projects less than 1/8 of a mile from transit as opposed to 1/2 or 1 mile away.

Figure 3 Transit Commute Mode Share by Distance of Destination to Transit (AM Peak, Greater Toronto)



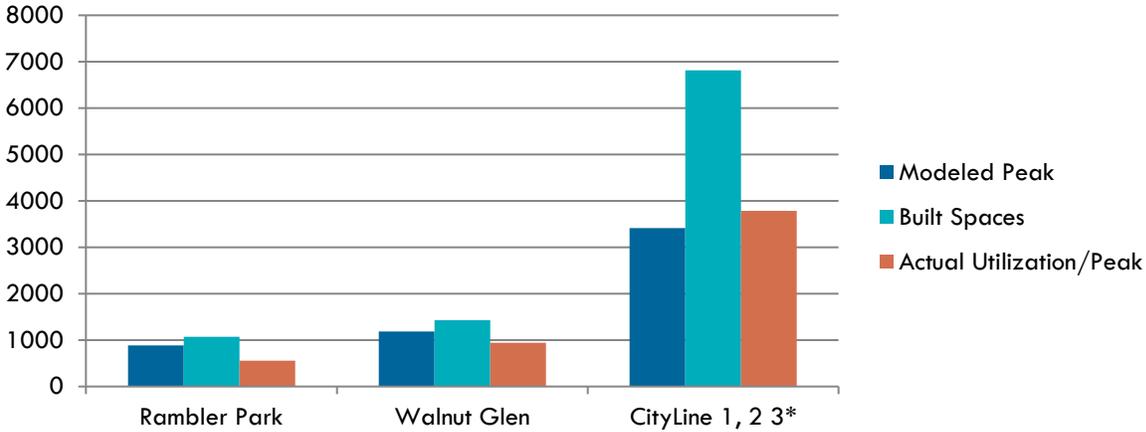
A study conducted for North Central Texas County of Governments⁶ collected data from 16 sites ranging in size from 7,000 to 1,000,000 square feet with on-site parking inventories range from 216 to 6,814 spaces. All sites were located within a modest walk of a DART rail station and observed peak occupancy

⁵ Crowley, David, Amer Shalaby, and Hossein Zarei. 2009. "Access Walking Distance, Transit Use, and Transit-Oriented Development in North York City Center, Toronto, Canada." *Transportation Research Record: Journal of the Transportation Research Board* 2110 (December): 96–105. <https://doi.org/10.3141/2110-12>.

⁶ <https://www.nctcog.org/trans/plan/land-use/tod/planning-studies/fta-pilot>

rates well below the projected demand by the developer. **Office-anchored TOD’s particularly over-supplied parking, whereas no development was found to exceed a 65% occupancy rate.**

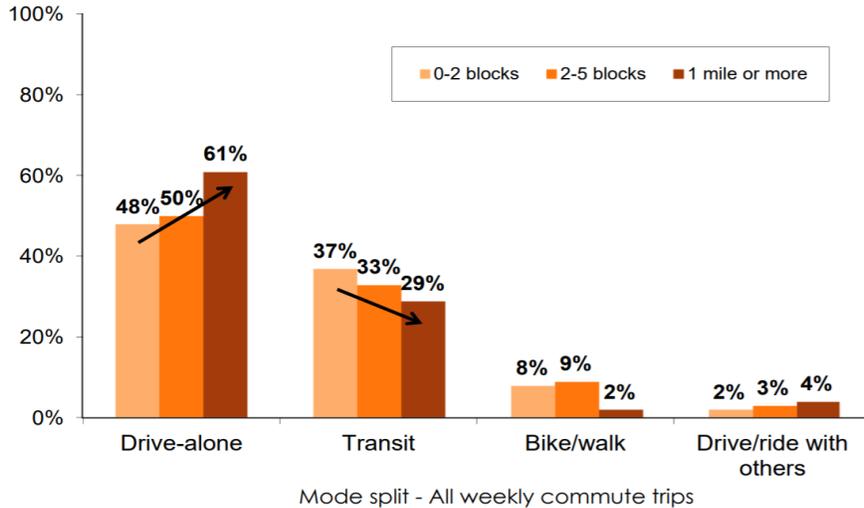
Figure 4 Parking Occupancy at Office-anchored and Office-mixed Study Sites in Dallas



Residential Contexts

A range of other studies have shown similar relationships between distance from a transit station and use of transit. In the Washington, D.C. metro area, a 2013 study showed that residents who lived within two blocks of a Metro station were 13% less likely to commute by driving than if they lived one mile or farther away from a station.⁷ Likewise, residents within two blocks of a Metro station were also 8% more likely to commute by transit than if they lived one mile or farther away. Findings are summarized in Figure 3 below.

Figure 5 Commute Mode Share in Residential Buildings vs. Distance to Transit



Transit proximity and vehicle trip generation

There is also a clearly established link between transit proximity and rates of parking demand. By locating a project near high-frequency transit service, a development could reduce parking demand by up to 25%, depending on its distance from transit. For a site like District NoHo, which is immediately on top of the

⁷ Arlington County Commuter Services. 2013. “Residential Building Transportation Performance Monitoring Study.” Arlington, VA. http://regionalparking.mtc.ca.gov/app/documents/accs_2013residentialbuildingtransportationstudy21oct2013presentation.pdf.

North Hollywood Metro station, proximity to transit alone may reduce on-site parking demand by up to 18%.⁸ One study of urban infill commercial development within 1/3 mile of transit in California found that observed parking demand rates were up to 50% lower than the estimated Institute of Transportation Engineers (ITE) rates.⁹

Developments with the lowest levels of free parking provided generally had the highest levels of transit usage. Other factors that influenced transit use for commuters include lower household vehicle ownership, living in a transit-served city, a constrained parking supply at work, parking pricing, employer transit subsidies, and long commute distances. One study found that transit-oriented office workers were over three times as likely to use transit when the parking supply was less than one space per two workers, resulting in lower parking demands at the office site.¹⁰

Transit-oriented development often has a greater mix of land uses, meeting the needs of workers without requiring vehicle trips to other destinations. Office development in proximity to BART stations in the San Francisco Bay Area, such as Pleasant Hill, reported that they generated 25% fewer vehicle trips than typical stand-alone office buildings not located near transit.¹¹

Low utilization of supplied parking has been observed at office developments located within walking distance (1,000 feet or less) to high-capacity transit stations. One study of developments in this category looked at DART stations in the Dallas-Fort Worth Metropolitan Area and observed peak occupancy rates well below the projected demand by the developer. Actual parking demand for office-dominant and office-mixed uses totaled an average equaling 57% of the built parking supply. Office developments in TOD districts experience lower parking demands than residential projects of the same scale and setting. Given evidence where residential projects experienced peak parking demand and occupancy overnight, car-owning employees may prefer to use alternative modes and store their car at home during work commutes when high-capacity transit is available.

The likelihood of a person choosing not to drive a vehicle influenced by characteristics not only of the trip origin, such as density and distance to station, but also at the trip destination, such as parking costs and bus connectivity. Higher parking costs and lower parking availability had the potential to influence a positive increase in the decision to commute without a car, especially when coupled with accessible and reliable bus connectivity at origin or destination.

⁸ CAPCOA. 2010. "Quantifying Greenhouse Gas Mitigation Measures." <http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf>.

⁹ Kimley-Horn. 2009. "Trip-Generation Rates for Urban Infill Land Uses in California." Caltrans. http://www.dot.ca.gov/newtech/researchreports/reports/2009/final_summary_report-calif_infill_trip-generation_rates_study_july_2009.pdf.

¹⁰ Transit Cooperative Research Program (TCRP) Report 95, 2007. "Traveler Response to Transportation System Changes, Chapter 17 – Transit Oriented Development." 17-29 and 17-66.

¹¹ Transit Cooperative Research Program (TCRP) Report 95, 2007. "Traveler Response to Transportation System Changes, Chapter 17 – Transit Oriented Development." 17-29 and 17-66.

Parking Demand and Supply in Comparable Contexts

Drawing from several parking studies that Nelson\Nygaard has completed in a range of mixed-use districts on the West Coast, we found that an average supply ratio of about 3.4 spaces per 1,000 square feet were built, but only an average of 1.9 spaces per 1,000 square feet were actually used. Many of these mixed-use districts were in regions with transit that is much less robust than in the Los Angeles region.

Figure 6 Parking Supply and Demand Ratios of Mixed-Use Developments

City / Town	Population	Density	Supply Ratio (spaces per 1k sf)	Demand Ratio (Spaces per 1k sf)	Actual Utilization
Oxnard, CA	207,906	7,729	1.7	0.98	58%
Santa Rosa, CA (Railroad Square)	174,972	4,216	7.66	3.60	47%
Salem, OR	167,419	3,228	3.15	2.04	65%
Lancaster, CA	160,106	1,698	3.67	1.37	37%
Ventura, CA (Westside)	109,592	5,024	2.87	1.26	44%
Beaverton, OR	97,590	4,795	4.15	1.85	45%
Santa Monica, CA (Downtown)	89,736	10,663	1.57	1.21	77%
Livermore, CA	89,115	3,310	5.54	3.09	56%
Newport Beach, CA (Corona del Mar)	86,688	3,645	4.08	2.24	55%
Newport Beach, CA (Balboa Village)	86,688	3,645	1.84	1.78	97%
Chico, CA	83,123	2,512	2.79	1.70	61%
San Clemente, CA (North Beach)	65,309	3,558	2.52	2.37	94%
Palo Alto, CA	64,403	2,498	2.12	1.90	90%
Redmond, WA	62,458	3,225	4.1	2.71	66%
Kirkland, WA	48,787	4,220	2.46	1.98	80%
Monterey, CA	28,454	3,280	2.14	1.2	56%
Soledad, CA	25,622	5,805	4.21	1.21	29%
Average			3.33	1.91	57%

It was found that in all case studies there were high rates of unutilized, built parking, contributing high values of wasted capital. In the single instance where modeled parking demand exceeded actual peak utilization, the built parking exceeded the actual peak by over 3,000 parking spaces, or a 56% actual utilization. Assuming a per-stall cost of \$45,000, the unused parking in this single example amounts to capital waste equaling \$35 million.

To understand the demand for parking for transit-oriented office spaces, five case study regions were selected based on their similarity to North Hollywood. This includes but is not limited to: Access to transit, built environment, socio-cultural car dependency, and transit-oriented development policy implementation.

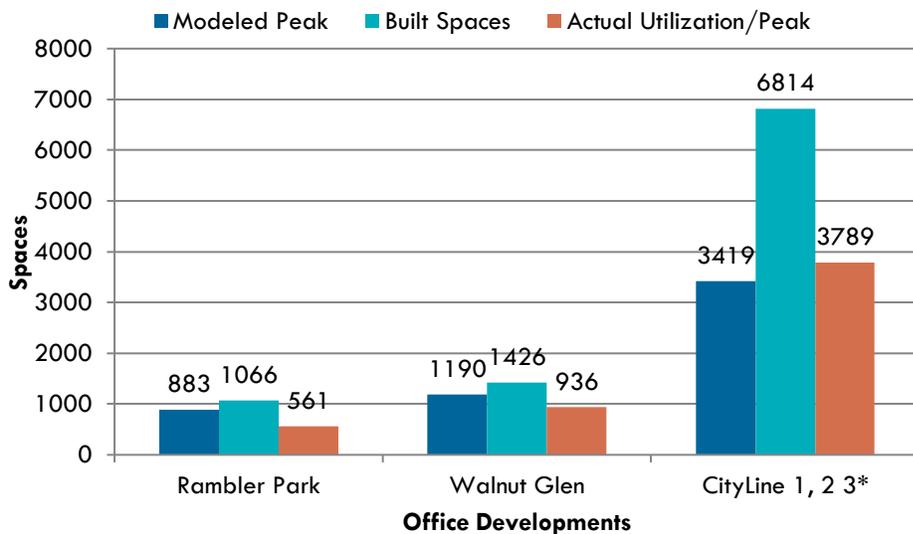
The prevalent oversupply of parking may be resulting from of a disconnect over the socio-cultural values of urban residents and employees of today’s generation. Accessibility of ride-sharing networks and technological advances in mobility options in addition to reliable transit allows for quick and convenient access from point A to point B. Urban centers, villages and neighborhoods are undergoing development patterns that build toward a live/work/play lifestyle (new urbanism) where individuals are interested in alternatives to traveling by car to fulfill their lifestyle needs. Based on the economic success of TNC’s, individuals in urban areas exhibit behavior indicating they prefer not to use a private vehicle when other options are available.

Dallas, Texas

A study conducted for North Central Texas County of Governments¹² collected data from 16 sites ranging in size from 7,000 to 1,000,000 square feet, and from 103 to 577 housing units. On-site parking inventories range from 216 to 6,814 spaces. All sites are located within a modest walk of a DART rail station. It was found that 13 of the 16 sites never peaked above 80% parking utilization. Office-anchored TOD’s particularly over-supplied parking, whereas no development was found to exceed a 65% occupancy rate. An office-mixed development in the study experienced a peak parking utilization of 56%. Similar to District NoHo, the building and facility surrounded a walkable street with ground-floor retail, and tree-lined well-lit sidewalks.

Parking occupancy was measured using cameras installed at the entrances of each site’s primary parking facilities. Counts were collected over a span of 72 hours (from midnight at the start of Thursday to midnight at the end of Saturday) at each site. A single, baseline parking occupancy count was completed manually by a member of the project staff during the same 72-hour span, to ensure the accuracy of the camera-based counts. The baseline count was matched to the number of entrances and exits of traffic to formulate a demand profile across the full 72-hour period. Actual Utilization/Peak was calculated by the maximum number of cars observed using the facilities on-site divided by the total supply.

Figure 7 Parking Occupancy at Office-anchored and Office-mixed Study Sites



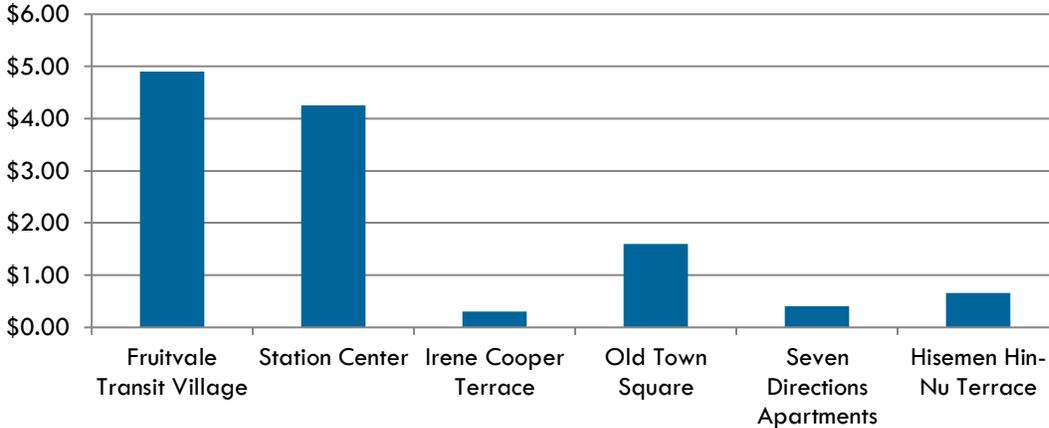
*The modelled peak demand is short of the observed peak. This is within the standard buffer of 10% typically added to demand projections when calculating recommended parking supplies. By contrast, the thousands of spaces that remained unoccupied throughout these surveys, suggest that the private sector calculations used to determine the parking supply for this development wildly over-projected supply needs.

¹² <https://www.nctcog.org/trans/plan/land-use/tod/planning-studies/fta-pilot>

San Francisco Bay Area, California

The GreenTRIP database¹³ informs decisions about parking supply and management at urban developments by providing parking data from 80 multi-family residential sites around the San Francisco Bay Area. For contextual similarity with District NoHo, data was filtered to Transit Oriented Development Corridors, Downtown, Fruitvale and Diamond Areas in Oakland, and Intermodal Station District in Union City. The average percent of unused parking spaces among five sites selected was 36%, with a range of 17-69%. The cost of approximately 230 unused parking spaces at those sites totaled over \$12 million.

Figure 8 Costs of Oversupplying Parking in the Bay Area



Vancouver, District of Columbia

Metro Vancouver and TransLink collaborated on the 2018 Regional Parking Study¹⁴ to analyze land-use patterns of development and the parking supply / utilization ratio.¹⁵ Findings revealed parking supply exceeded utilization across the metropolitan region, where utilization was even lower when located near frequent transit, compared to locations further from transit. The study surveyed residential developments (strata¹⁶, rental and mixed tenure sites) and in all residence categories, parking utilization decreased in correlation with proximity to transit.

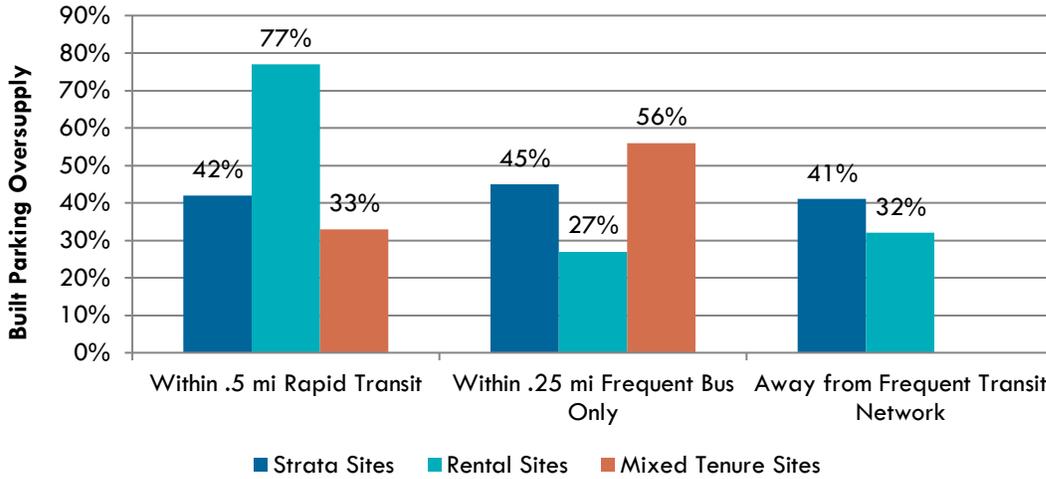
¹³ <http://database.greentrip.org/>

¹⁴ <http://www.metrovancouver.org/services/regional-planning/PlanningPublications/RegionalParkingStudy-TechnicalReport.pdf>

¹⁵ <http://www.metrovancouver.org/services/regional-planning/PlanningPublications/RegionalParkingStudy-TechnicalReport.pdf>

¹⁶ Strata is a category of housing in British Columbia, often condos, townhouses, duplexes, and sometimes single-family homes. Home owners own individual lots and together own the common property and common assets.

Figure 9 Parking Oversupply Estimates at 69 Study Locations in Metro Vancouver



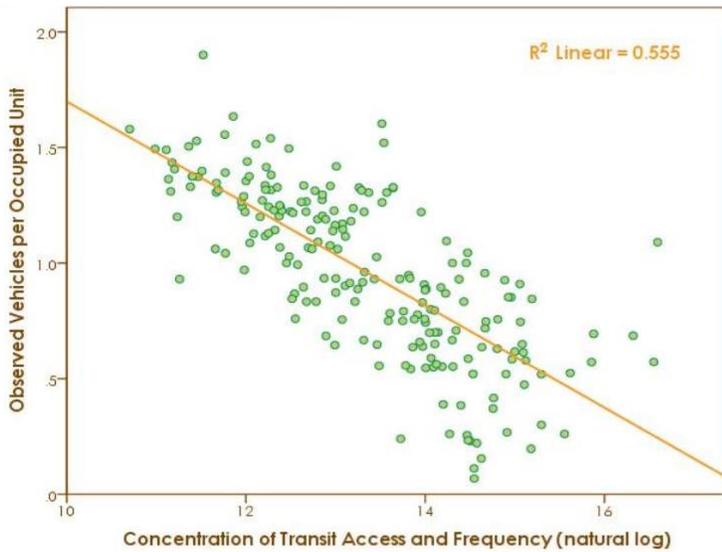
Observing transit boardings at stations located within the 0.25 mile and 0.5 mile distance from the site, the 2018 Study found a correlation between lower parking utilization and higher rates of transit usage, indicating the availability of transit within 800m has an effect on mode choice in favor of public transportation over use of a private, personal vehicle.

Seattle, Washington

King Country Metro Transit coordinated the Right Size Parking Project that resulted in a parking utilization forecasting model to efficiently calculate tailored parking requirements for new housing developments in the region. To design the model, parking field counts were collected at approximately 240 properties¹⁷. Parking utilization at each site was analyzed against a gravity measure of transit, informed by distance from available transit stops/stations, scaled by the frequency of service. The data revealed a strong reverse-correlation between transit access and parking utilization, whereas higher concentration of transit access fit with lower observed vehicles per occupied residential unit, at an R-square value of 55.5%.

¹⁷ http://www.rightsizeparking.org/Right_Size_Parking_Technical_Memo.pdf

Figure 10 Gravity Measure of Transit Frequency Courtesy of King County Metro



Observed Vehicles per occupied unit is directly correlated with access to transit, indicating that a higher concentration of transit measures (access to a variety of stops, stations, and frequency of service) will result in lower parking demand.

Arlington County, Virginia / Washington, District of Columbia

To accommodate growing population and employment in the Washington D.C. region, Washington Metro extended the rapid transit system, accommodated by transportation demand management policies, to the neighboring Arlington County suburbs. The project is nationally recognized as a successful model of transit-oriented development nationwide. The corridor has met the majority of office space demand as well as housing demands for a growing population of workers who want to take public transit to work.¹⁸

The Rosslyn-Ballston Corridor consists of five neighborhoods, each with locally specific TDM policies and oversight committees to adjust to changes in transportation demand. Trends over several decades illustrate decreases in parking demand. The Arlington County Residential Building Study (May 2018) analyzed 2010-2015 data at 36 properties along the transit corridor, summarized by neighborhood in Figure 7 below¹⁹.

While the Rosslyn neighborhood is characterized as a “First-class office and business center²⁰” with approximately 22,000 off-street parking spaces available to many successful businesses, garages are observed to have capacities that exceed demand²¹. Due to this, the Rosslyn Sector Plan aims to minimize the number of new parking spaces built through reduced parking ratios and increased sharing of parking among uses and properties.

In the Arlington County Residential Building Study, illustrated in Figure 7, data was collected on-site between 2010 and 2015 and consisted of entrance/exit counts and parking counts at each building site. The parking protocol was to have a full count of garage entrances and exits 24 hours a day for seven days. Most parking counts used pneumatic tubes, though in cases where the garage entrances and/or exits presented a difficult geometry, video monitors were used instead. Maximum occupancy was calculated by

¹⁸ http://ccap.org/assets/CCAP-Booklet_USArlington.pdf

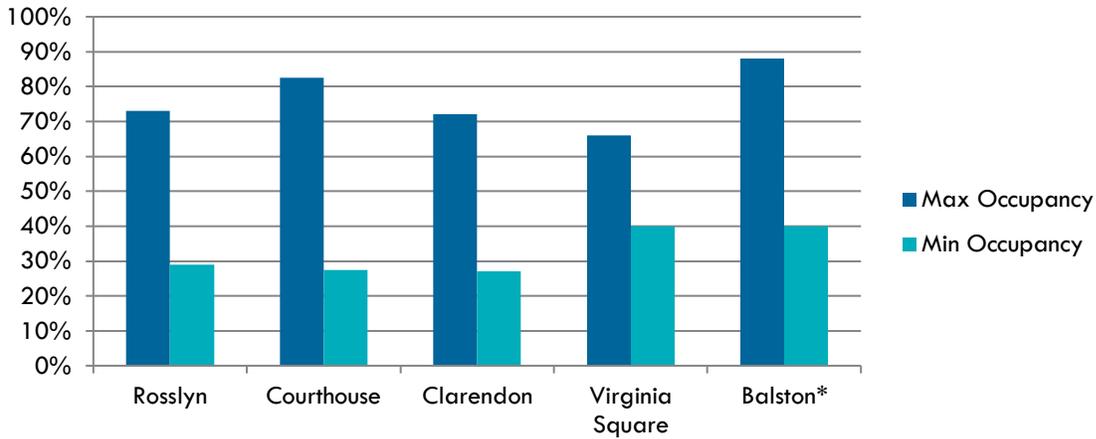
¹⁹ https://1105am3mju9f3st1xn20q6ek-wpengine.netdna-ssl.com/wp-content/uploads/2018/05/Residential-Aggregate-Analysis_Final-Report.pdf

²⁰ <https://projects.arlingtonva.us/planning/smart-growth/rosslyn-ballston-corridor/>

²¹ http://arlingtonva.s3.amazonaws.com/wp-content/uploads/sites/31/2015/12/151208_RosslynSectorPlan-HI.pdf

the maximum number of cars observed using the facilities on-site divided by the total supply, whereas the minimum occupancy was calculated by the lowest number of cars observed using the facilities divided by the total supply. Values were averaged among buildings to produce the average demand by neighborhood.

Figure 11 Average Maximum and Minimum Occupancy by Neighborhood in Arlington County



*Zoning Ordinance provisions for major office development presently require approximately 2 parking spaces for every 1,000 square feet of gross floor area. This requirement is based on an assumed modal split with 40 percent travel by mass transit.

Parking Oversupply at Comparable Developments

Among the comparable developments previously described, parking supply ratios tend to be higher than actual demand. Figure 10 summarizes the data from specific sites and categorical neighborhoods or development types. Cells within are greyed-out where data was limited.

Figure 12 Parking Oversupply at Comparable Residential Developments

Region	Neighborhood / Type	Site / Location	Sample Size	Miles to Station	Total Spaces	Spaces per unit	Maximum occupancy	Parking Oversupply	
Vancouver, B.C.	Strata Sites	Within 0.5mi rapid transit	22			1.21	58%	42%	
		Within 0.25mi frequent bus	20			1.40	55%	45%	
	Rental Sites	Within 0.5mi rapid transit	3			0.62	23%	77%	
		Within 0.25mi frequent bus	3			0.90	75%	25%	
	Mixed Tenure	Within 0.5mi rapid transit	4			0.80	67%	33%	
		Within 0.25mi frequent bus	3			1.09	44%	56%	
Seattle, WA	Urban Centers	Within Frequent Transit Corridor	86						
Arlington, VA Washington, D.C.	Rosslyn	Crescent Falls Church Apartments	1	0.28	398	1.6	52%	48%	
		The Continental Condominium	1	0.15	470	1.1	84%	16%	
		Tumberry Towers	1	0.19	379	1.0	84%	16%	
	Courthouse	1800 Wilson Blvd	1	0.28	192	1.3	75%	25%	
		ARC 3409 (Joule)	1	0.16	92	1.0	90%	10%	
	Clarendon	Clarendon Center	1	0.06	458	1.0	75%	25%	
		The Phoenix	1	0.18	501	1.2	56%	44%	
		The Macedonian	1	1.69	44	1.2	45%	55%	
		Zoso Flats	1	0.18	212	1.3	85%	15%	
		V Point	1	0.08	120	1.0	78%	22%	
	The Jordan	1	0.26	77	0.8	90%	10%		
	Virginia Square	Liberty City Residences	1	0.24	312	1.3	66%	34%	
	Balston	Crystal City Lofts	1	0.4	234	1.3	100%	0%	
		Sedona State	1	0.18	422	0.9	110%	-10%	
		The Halstead	1	1.53	460	1.1	48%	52%	
Parc Rosslyn		1	0.33	255	1.1	96%	4%		
Quincy Plaza	1	0.24	615	1.2	84%	16%			
Dallas, TX	Dallas	Rambler Park	1	0.25	1,066		53%	47%	
		5 Mockingbird	1	0.08	659		71%	29%	
		Lancaster Urban Village	1	0.06	405		40%	60%	
		The Belleview	1	0.17	216		50%	50%	
		Walnut Glen Tower	1	0.11	1,426		65%	35%	
		LBJ Station Apartments	1	0.12	295		70%	30%	
		The Parc	1	0.04	391		80%	20%	
		West Village Garage 2	1	0.15	468		66%	34%	
		West Village Garage 3	1	0.15	813		57%	43%	
		Modena	1	0.14	270		93%	7%	
		The Lofts at Mockingbird	1	0.09	227		89%	11%	
	Garland	5 th St Crossing at City Station Phase 1	1	0.11	387		39%	61%	
		5 th St Crossing at City Station Phase 2	1	0.18	322		58%	42%	
	Richardson	CityLine 1, 2, and 3	1	0.03	6,814		56%	44%	
		Brick Row	1	0.09	1,019		67%	33%	
	Plano	Junction 15	1	0.09	337		92%	8%	
	Bay Area, CA	Downtown	Old Town Square, Regional Center	1	0.3	100	101	80%	20%
		Fruitvale & Diamond Areas	Fruitvale Transit Village	1	0.1	142	3.02	31%	69%
Seven Directions Apartments			1	0.8	40	1.11	80%	20%	
Hisemen Hin-Nu Terrace			1	0.8	83	0.9	83%	17%	
TOD Corridors		Irene Cooper Terrace	1	0.6	16	0.4	63%	37%	
Union City		Station Center	1	0.5	157	1	46%	54%	

Conclusion

In our review of the literature, we found a significant oversupply of parking again and again, in all studied regions and building typologies. The prevalent oversupply of parking may be resulting from a disconnect over the socio-cultural values of urban residents and employees of today's generation. Accessibility of ride-sharing networks and technological advances in mobility options in addition to reliable transit allows for quick and convenient access from point A to point B. Urban centers, villages and neighborhoods are undergoing development patterns that build toward a live/work/play lifestyle (new urbanism) where individuals are interested in alternatives to traveling by car to fulfill their lifestyle needs. Based on the economic success of TNC's, individuals in urban areas exhibit behavior indicating they prefer not to use a private vehicle when other options are available.

In Nelson\Nygaard's extensive experience analyzing parking demand in mixed-use districts, we have seen that parking demand associated with non-residential uses tends to fall between one and two spaces per 1,000 square feet and that employees' likelihood to commute by driving alone diminishes in direct proportion with the distance of their workplace from high-capacity transit stations like the North Hollywood Metro station.

Based on our findings, we have concluded that for the District NoHo, **a parking ratio of 3.2 spaces per 1,000 square feet of floor area, as identified in the project plans, will result in a gross oversupply of parking, and millions of wasted dollars.**

With its location immediately adjacent to high-capacity transit, District NoHo could see around one-third more transit commuting than projects further than a quarter-mile from the station. We recommend that the project be designed with a proportional reduction in parking supply.

APPENDICES

Additional Considerations for Reducing Parking Demand

Walkable Context

There is a substantial body of literature supporting the link between pedestrian-friendly design and increased walking. Pedestrian-oriented design and walkability is associated with higher rates of transit usage by workers at transit-oriented offices. Some of the most common factors that promote walkability include human-scale street design with wide, well-maintained sidewalks and pedestrian-oriented lighting, street-level retail and services, and higher densities of development.²² The neighborhood surrounding District NoHo, features many of these characteristics, such as a diverse land use mix, street-level retail and services, and dense development. Wide sidewalks and street trees provide comfortable walking conditions to access businesses and services surrounding the site. South of the development, occupants are provided restaurants, nightlife, banking, healthcare offices and fitness centers. West of the development occupants have access to civic services such as a post office, recreational center, public park and a farmer's market. North of the development occupants have access to specialized services such as salons, studios and industry-specific offices.

Other design elements that can enhance walkability include shorter blocks and frequent, well-connected intersections that increase overall intersection density and create more direct access to destinations. Design features such as sidewalk coverage, building setbacks, street widths, pedestrian crossings, street trees and furniture, and lighting also contribute to walkability, but their effects on pedestrian travel are more difficult to quantify. Depending on the intersection density of the surrounding area, trip reductions relative to auto-oriented suburban development can range from 3% to 21%.²³ In general, a one percent increase in intersection density is associated with a 0.12% decrease in VMT.²⁴

Overall site design is important to establishing an environment that prioritizes the movement of people over cars. Sites where building entrances are hidden from view and desired paths of travel (i.e. "desire lines") are obscured from the sidewalk perspective tend to encourage more vehicle trips and discourage walking and biking. Some design features to consider are:

- Strategic location of parking access points to limit circling and avoid conflicts with people walking and bicycling;
- Proactive curb management to clearly identify passenger loading zones, discourage long-term parking, and avoid conflicts between drivers and people walking and bicycling wherever possible; and
- Clearly marked, pedestrian-oriented building access points and paths of travel throughout the development that optimize connections with nearby transit services and bicycle facilities.

²² Lund, Hollie, Robert Cervero, and Richard Wilson. n.d. "Travel Characteristics of Transit-Oriented Development in California." Caltrans, Statewide Planning Studies FTA Section 5313 (b). https://www.bart.gov/sites/default/files/docs/Travel_of_TOD.pdf.

²³ CAPCOA. Pg. 183.

²⁴ Ewing, Reid, and Robert Cervero. 2010. "Travel and the Built Environment." *Journal of the American Planning Association* 76 (3): 265–94. <https://doi.org/10.1080/01944361003766766>. Table 4.

Temperature and weather conditions encourage walking as well. Moreover, a study of pedestrian trip frequency and weather in the Bay Area found that pedestrian trip frequency to and from transit stations as part of a commute was slightly more sensitive to changes in temperature compared to non-commute weekday trips. For instance, a one degree increase (in Celsius) is associated with a 1.1% increase in transit-oriented commute trips, compared to a 0.9% increase in non-commute weekday trips.²⁵ Los Angeles's consistently pleasant weather conditions will be highly conducive to walking to and from the nearby Metro station and other amenities.

Transportation Demand Management Measures

A 2010 report by the California Air Pollution Control Officers Association (CAPCOA) presents a way to quantify the total impact of different TDM strategies implemented together. The CAPCOA report utilizes an extensive literature review of the effectiveness of TDM and other greenhouse gas (GHG) reduction strategies, including location, land use, and site design as well as programmatic strategies. The report provides clear guidance on the assumptions and limitations of each strategy. Since the interactions between the various measures is complex and because strategies are typically implemented as part of multi-pronged trip-reduction programs, the report lays out a methodology for estimating the trip-reduction effects of a collection of context, site-design, and TDM characteristics. Based on evidence from a range of multi-pronged programs in different contexts, the report establishes maximum reduction values. These maximum reductions are based on location and project development type.

Commute trip reduction strategies make up a major component of this maximum impact percentage. Moreover, a reduced parking supply is more marketable when paired with transportation benefits and services that reduce tenants' need to drive. Proactive management of the available on-site parking, which may include right-sizing supply, pricing, unbundling, or other measures, is one of the most effective TDM levers, especially when transportation options like high-frequency transit and walking/biking infrastructure are nearby. Other TDM strategies that augment parking management and transit proximity include:

Transit pass subsidies

- A change in home or job locations presents the opportunity to change travel mode behavior. An effective measure of attracting new ridership has been shown through implementing transit pass programs. When Orenco Station was opened along Portland's Westside MAX (light rail), a study following the launch of a pilot TOD Pass Program found a rise in transit use from 30% to 83% between fall and the following spring. Demand-side subsidies (i.e. passes) are more likely to increase transit ridership and reduce parking at specific site. Transit passes are also tax-deductible for employers and tax-free for employees.
- Boulder, Colorado's transit supply may be comparable to high-capacity transit considering the local supply of 17 different routes at 15-minute headways. Employees within the Central Area General Improvement District (CAGID) in Downtown Boulder receive free passes through the ECO-Pass program, which provides free access to all lines in Boulder's Community Transit Network, and Denver's Regional Transportation District light rail and bus network. In 2005, it was estimated that 83% of the 10,000 employees

²⁵ Vanky, A. P., Verma, S. K., Courtney, T. K., Santi, P., & Ratti, C. (2017). Effect of weather on pedestrian trip count and duration: City-scale evaluations using mobile phone application data. *Preventive Medicine Reports*, 8, 30–37. <http://doi.org/10.1016/j.pmedr.2017.07.002>

working in the downtown area were participating in the program. Compared to the base year of 1995, 2005 data showed a near doubling of transit ridership from 15% to 34%, and a drop in the rate of drive-alone commuting from 56% to 36%.

Parking cash-out

- When employees receive free on-site parking from employers, the costs usually are passed on to all employees in the form of lower wages. Many employers are implementing cash-out programs to provide employees with a choice of receiving free parking or receiving a cash payment equaling the equivalent subsidy of free parking, to use transit or other alternatives to the single-occupancy vehicle. A Canadian study conducted by the Victoria Transport Policy Institute shows that cash-out reduces parking demand by 15-25%. Effectiveness of cash out programs typically depends on the availability of transit and other alternative modes available, as well as availability of free parking nearby. According to a study by Donald Shoup at the University of California-Los Angeles, cash-out is about two thirds as effective as charging for parking. Conversely, many corporate campuses in locations that are subject to district-level peak trip caps, such as Silicon Valley and Seattle, are incentivizing employees to not park by offering a daily financial reward for using non-drive-alone modes that are automatically distributed through commuter management platforms like Luum.

Sustainable transportation incentives, i.e. providing financial incentives for individuals who log trips on transit, bicycling, and/or walking

- Controlling for other variables and benefit combinations, commuters with free parking at work, and no benefits supporting alternative modes, were less likely to choose to commute by public transportation, walking, or cycling over driving. Commuters with employers who only offer public transportation benefits are about eleven times more likely to take public transportation than to drive. Commuters with only public transportation benefits are also more likely to choose walking over driving. Bike/walk benefits were significantly correlated with choosing to cycle to work over driving.

On-demand carpooling and ride-sharing

- Rideshare matching eases the burden of locating carpool partners by connecting employees who live and work in close proximity to each other and have similar work hours. For employees who live or work in areas that are not well served by public transit, ride matching offers significant potential to reduce trip generation. Carpool programs are most successful when combined with guaranteed-ride-home vouchers to allow for reimbursement of midday taxi or TNC (Lyft/Uber) trips in cases of personal illness or immediate family needs.

End-of-trip facilities

- Employers can encourage bicycling by providing bicycle parking or storage, showers, and lockers on-site. End of trip facilities with showers and changing rooms can encourage people to commute via bicycle, especially for employees that ride longer distances or have concerns about arriving to work sweaty from a bike ride. A policy brief from the California Air Resources Board cites studies in which end of trip facilities, including showers at workplaces, increase the perceived comfort of bicycling and encourage shifts from other modes.

Absent of financial incentives for alternative travel modes to the single-occupancy vehicle and programs that alleviate the need for a personal automobile at work, solo driving will remain the overwhelmingly preferred mode of travel to work.

Reductions in parking can also be produced by the relationships between certain land uses. One example is a retail market that serves employees who work and shop within the same site. In this case, adjacent office and retail uses may not have significantly different peak hours of operation, but physical proximity allows internal trips to be made without using cars.



Jordan Hallman <jordan.hallman@lacity.org>

Please support this plan

1 message

Tiphaine Abarca <tiphaineslefevre@everyactioncustom.com>

Tue, Jan 5, 2021 at 9:38 AM

Reply-To: tiphaineslefevre@gmail.com

To: downtownplan@lacity.org

Dear Downtown Plan,

The need to prioritize housing continues. Now is not the time to pull back on creating homes for all in Los Angeles. Thank you for the opportunity to comment on the forthcoming update to the Downtown Community Plan. I'm writing on behalf of Abundant Housing LA, a pro-housing education and advocacy organization working to help solve Southern California's housing crisis. AHLA supports efforts to promote equity and reform land use regulations and zoning codes, and expand housing production at all levels of income.

As you know, the City of Los Angeles is suffering from a severe housing crisis. Exclusionary zoning, systemic racism, and longstanding constraints on denser housing production, combined with a lack of sufficient funding for affordable housing production and preservation, have led to a massive housing shortage. This has made Los Angeles one of the nation's most unaffordable housing markets. High rents and a lack of new housing opportunities have caused greater financial pressure on families, longer commutes, increasing carbon emissions, more displacement of historically disadvantaged communities, high homelessness, and reduced access to economic and educational opportunity. This has also reinforced longstanding patterns of income and racial segregation in our city's neighborhoods.

The Downtown Community Plan is an important step in meeting the needs of our Downtown residents, and its policies will promote more housing affordability.

I support the Plan for these reasons. I also ask for these additional changes to reduce car dependence and meet housing needs:

Restore the proposed base FAR from the summer 2020 version of the Plan, eliminate proposed maximum building heights, and implement the maximum bonus FAR proposed in the Draft Environmental Impact Report's Alternative 3. Modify the requirement that residential buildings in Subarea A.3 that use the density bonus program must make at least 30% of the building's units two bedrooms or larger. Encourage production of affordable family units by introducing a "super-density bonus" tier throughout Downtown, for projects that make at least 30% of the building's two bedrooms or larger.

Introduce a parking maximum on new construction, and introduce a per-space fee on all existing and new parking lots and garages in Downtown.

Amend the Industrial-Mixed Use 2 (IX2) and Hybrid Industrial 2 (HI2) zones to allow all residential housing types. Do not restrict housing options in these areas to live-work units only.

A Downtown Community Plan update that incorporates these policies will help advance our common goals of housing affordability, socioeconomic equity, economic prosperity, and environmental sustainability. Thank you for your consideration, and for your hard work on this important project.

Personally sent by Tiphaine Abarca using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,

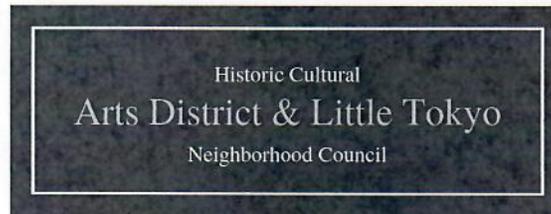
Tiphaine Abarca

3464 Elm Ave Long Beach, CA 90807-4456

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OFFICERS

Nancy Yap, President
Miguel Vargas, VP
Kristin Fukushima, Secretary
George Campos, Treasurer



ARTS DISTRICT LITTLE TOKYO
NEIGHBORHOOD COUNCIL
c/o Koban
307 E First Street
Los Angeles, CA 90012

admin@hcnc-adlt.org

**Arts District & Little Tokyo
Neighborhood Council (ADLT)**



December 29, 2020

Downtown Community Plan
Los Angeles Department of City Planning
200 North Spring Street, Room 667
Los Angeles, CA 90012

RE: Public Comment on Downtown Community Plan

Dear City Planning Staff:

On behalf of the Arts District & Little Toyo (ADLT) Neighborhood Council I wanted to personally thank you for all of the hard work your entire team has done to prepare a draft DTLA 2040 community plan for the community's consideration. The Arts District and Little Tokyo communities absolutely understand and appreciate the role the DLTA 2040 will play in shaping our respective communities' future.

The purpose of this letter is to clarify that while many individuals from Little Tokyo and the Arts District have already given public comments on the DTLA 2040, the ADLT has not formally taken any position on any elements of the DTLA 2040 and will not. Because of a subdivision and a subsequent reorganization, our neighborhood council has unfortunately not been able to establish a Land Use Committee yet. Please note that any public comments submitted to your department regarding the DTLA 2040 plan do not represent the official stance of the Arts District & Little Tokyo Neighborhood Council.

We greatly appreciate your understanding in this matter and look forward to the adopted version of the DTLA 2040 Plan. If you have any questions, please do no hesitate to contact me at Nancy@hcnc-adlt.org .

Sincerely,

Nancy Yap
ADLT President



Jordan Hallman <jordan.hallman@lacity.org>

Please support this plan

1 message

Katherine Aker <kathiaker@everyactioncustom.com>

Mon, Dec 14, 2020 at 2:20 PM

Reply-To: kathiaker@icloud.com

To: downtownplan@lacity.org

Dear Downtown Plan,

Thank you for the opportunity to comment on the forthcoming update to the Downtown Community Plan. I'm writing on behalf of Abundant Housing LA, a pro-housing education and advocacy organization working to help solve Southern California's housing crisis. AHLA supports efforts to promote equity and reform land use regulations and zoning codes, and expand housing production at all levels of income.

As you know, the City of Los Angeles is suffering from a severe housing crisis. Exclusionary zoning, systemic racism, and longstanding constraints on denser housing production, combined with a lack of sufficient funding for affordable housing production and preservation, have led to a massive housing shortage. This has made Los Angeles one of the nation's most unaffordable housing markets. High rents and a lack of new housing opportunities have caused greater financial pressure on families, longer commutes, increasing carbon emissions, more displacement of historically disadvantaged communities, high homelessness, and reduced access to economic and educational opportunity. This has also reinforced longstanding patterns of income and racial segregation in our city's neighborhoods.

The Downtown Community Plan is an important step in meeting the needs of our Downtown residents, and its policies will promote more housing affordability.

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Restore the proposed base FAR from the summer 2020 version of the Plan, eliminate proposed maximum building heights, and implement the maximum bonus FAR proposed in the Draft Environmental Impact Report's Alternative 3.

Modify the requirement that residential buildings in Subarea A.3 that use the density bonus program must make at least 30% of the building's units two bedrooms or larger. Encourage production of affordable family units by introducing a "super-density bonus" tier throughout Downtown, for projects that make at least 30% of the building's two bedrooms or larger.

Introduce a parking maximum on new construction, and introduce a per-space fee on all existing and new parking lots and garages in Downtown.

Amend the Industrial-Mixed Use 2 (IX2) and Hybrid Industrial 2 (HI2) zones to allow all residential housing types. Do not restrict housing options in these areas to live-work units only.

A Downtown Community Plan update that incorporates these policies will help advance our common goals of housing affordability, socioeconomic equity, economic prosperity, and environmental sustainability. Thank you for your consideration, and for your hard work on this important project.

Personally sent by Katherine Aker using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,

Ms. Katherine Aker

10402 McClellmont Ave Tujunga, CA 91042-1816

kathiaker@icloud.com



Jordan Hallman <jordan.hallman@lacity.org>

Please support this plan

1 message

Josh Albrektson <joshraymd@everyactioncustom.com>

Mon, Dec 14, 2020 at 3:00 PM

Reply-To: joshraymd@gmail.com

To: downtownplan@lacity.org

Dear Downtown Plan,

Thank you for the opportunity to comment on the forthcoming update to the Downtown Community Plan. I'm writing on behalf of Abundant Housing LA, a pro-housing education and advocacy organization working to help solve Southern California's housing crisis. AHLA supports efforts to promote equity and reform land use regulations and zoning codes, and expand housing production at all levels of income.

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Modify the requirement that residential buildings in Subarea A.3 that use the density bonus program must make at least 30% of the building's units two bedrooms or larger. Encourage production of affordable family units by introducing a "super-density bonus" tier throughout Downtown, for projects that make at least 30% of the building's two bedrooms or larger.

Introduce a parking maximum on new construction, and introduce a per-space fee on all existing and new parking lots and garages in Downtown.

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A Downtown Community Plan update that incorporates these policies will help advance our common goals of housing affordability, socioeconomic equity, economic prosperity, and environmental sustainability. Thank you for your consideration, and for your hard work on this important project.

Personally sent by Josh Albrektson using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,

Josh Albrektson

1123 Windsor Pl South Pasadena, CA 91030-3231

joshraymd@gmail.com



Jordan Hallman <jordan.hallman@lacity.org>

Please support this plan

1 message

Anthony Dedousis <anthony@everyactioncustom.com>

Mon, Dec 14, 2020 at 2:14 PM

Reply-To: anthony@abundanthousingla.org

To: downtownplan@lacity.org

Dear Downtown Plan,

Thank you for the opportunity to comment on the forthcoming update to the Downtown Community Plan. I'm writing on behalf of Abundant Housing LA, a pro-housing education and advocacy organization working to help solve Southern California's housing crisis. AHLA supports efforts to promote equity and reform land use regulations and zoning codes, and expand housing production at all levels of income.

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Personally sent by Anthony Dedousis using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,

Anthony Dedousis

3675 Vinton Ave Los Angeles, CA 90034-5725

anthony@abundanthousingla.org



Jordan Hallman <jordan.hallman@lacity.org>

Fwd: SKID ROW 2040

9 messages

Yvonne Autry <6976bellemichelle96@gmail.com>
To: downtownplan@lacity.org

Fri, Dec 18, 2020 at 5:47 PM

----- Forwarded message -----

From: **Yvonne Autry** <6976bellemichelle96@gmail.com>

Date: Fri, Dec 18, 2020, 5:34 PM

Subject: SKID ROW 2040

To:

Cc: Yvonne Autry <6976bellemichelle96@gmail.com>, <6976bellemichelle@gmail.com>

I am Yvonne Michelle Autry, 17 year steakholder; living and working here in Down Town Los Angeles!

For the last 17 years now; I have been active with LACAN (Los Angeles Community Action Network), STOP LAPD SPYING, UCEPP (United Coalition East Prevention Project), LAPD (Los Angeles Poverty Department), DRAMASTAGE QUMRAN, CENTRAL CITY EAST - CHURCH OF THE NAZARENE, DLANC (Downtown Los Angeles Neighborhood Council), ORGANIZING SKID ROW NEIGHBORHOOD COUNCIL, UVP (Urban Voices Project) SKID ROW COMMUNITY IMPROVEMENT COALITION (SRCIC); most recently, I have been increasingly active with DWAC (Downtown Women's Action Coalition), THE PEOPLE CONCERN, ORGANIZING UNION DE VECINOS and last but not least: SKID ROW 2040!

I am concerned about the FUTURE of SKID ROW! I am supremely concerned with the FUTURE of DOWN TOWN proper, especially now at this time, reeling in the wake of this through this pandemic, even as REGENTRIFICATION continues!

I know that we WON! I know that we qualified! I believe that there was some ballot tampering! FRAUD etc in our counting of THE SKID ROW NEIGHBORHOOD COUNCIL ballots etc! Just to keep BLACK PEOPLE and poor people from gaining GREATER control of SKID ROW!

As a stakeholder in the Downtown area; I remain GREATLY concerned about HOUSING AS A HUMAN RIGHT! First and foremost; we need MORE AFFORDABLE HOUSING! In my opinion; The VERY FIRST priority should be housing the houseless, homeless, indigent of SKID ROW! NOT BUILDING MORE EXPENSIVE CONDOMINIUMS for the wealthy and the affluent!

MAINTAINANCE, CLEANLINESS / SANITATION within the boundaries of SKID ROW is another priority!

Police Horse manure needs to be CONSISTENTLY CLEANED UP! IMMEDIATELY! Prolonging the CLEAN UP; allowing the manure to stay on the street increases and encourages the spread of disease!

Veterans need to be housed! Veterans need benefits! They should not be living in the streets! They should be housed! RIGHT NOW! THIS IS A PRIORITY!

I advocate for INCREASED Green Spaces in SKID ROW! I WANT LOVELY parks with BIG BEAUTIFUL TREES, MUCH GREEN grass etc; just like in affluent white and Jewish communities!

I want A SAFE SPACE! SAFE PLACE! REFUGE & RESPITE FOR WOMEN fleeing domestic violence, sex slavery, human sex trafficking etc!

I WANT A DAYCARE CENTER ON SKID ROW repleat with sauna, steam, recreation /game room, counseling facility, worship facility, meeting rooms etc!

I feel that there should be MORE SUPPORT FOR SMALL BUSINESSES!

I oppose! I object to ADDITIONAL LIQUOR LICENSING! NO MORE! WE DO NOT WANT THIS! WE DO NOT NEED THIS!

NO MARIJUANA DISPENSARIES! NO FURTHER CRIMINALIZATION, INCRIMINATION! NO MORE EXPLOITATION OF THE POOR PEOPLE, BLACK PEOPLE, INDIGENT PEOPLE OF SKID ROW!

I DEMAND REPARATIONS! 40 ACRES AND 1 MULE FOR MYSELF AND OTHER BLACK AFRICAN AMERICAN DECENDANTS OF SLAVES! 40 ACRES AND 1 MULE roughly translates to 1 condominium and 1 car!

WE WANT COMMUNITY! WE WANT REAL COMMUNITY! WE WANT PARITY!
NOT EXPLOITATION! NOT REGENTRIFICATION!

Yvonne Autry <6976bellemichelle96@gmail.com>

Fri, Dec 18, 2020 at 6:29 PM

To: downtownplan@lacity.org, Yvonne Autry <6976bellemichelle96@gmail.com>, 6976bellemichelle@gmail.com

----- Forwarded message -----

From: **Yvonne Autry** <6976bellemichelle96@gmail.com>

Date: Fri, Dec 18, 2020, 5:47 PM

Subject: Fwd: SKID ROW 2040

To: <downtownplan@lacity.org>

----- Forwarded message -----

From: **Yvonne Autry** <6976bellemichelle96@gmail.com>

Date: Fri, Dec 18, 2020, 5:34 PM

Subject: SKID ROW 2040

To:

Cc: Yvonne Autry <6976bellemichelle96@gmail.com>, <6976bellemichelle@gmail.com>

I am Yvonne Michelle Autry, 17 year steakhokder; living and working here in Down Town Los Angeles!

For the last 17 years now; I have been active with LACAN (Los Angeles Community Action Network), STOP LAPD SPYING, UCEPP (United Coalition East Prevention Project), LAPD (Los Angeles Poverty Department), DRAMASTAGE QUMRAN, CENTRAL CITY EAST - CHURCH OF THE NAZARENE, DLANC (Downtown Los Angeles Neighborhood Council), ORGANIZING SKID ROW NEIGHBORHOOD COUNCIL, UVP (Urban Voices Project) SKID ROW COMMUNITY IMPROVEMENT COALITION (SRCIC); most recently, I have been increasingly active with DWAC (Downtown Women's Action Coalition), THE PEOPLE CONCERN, ORGANIZING UNION DE VECINOS and last but not least: SKID ROW 2040!

I am concerned about the FUTURE of SKID ROW! I am supremely concerned with the FUTURE of DOWN TOWN proper, especially now at this time, reeling in the wake of this pandemic, even as REGENTRIFICATION continues!

My most pressing concerns include but are not limited to:

The people of SKID ROW want A SKID ROW NEIGHBORHOOD COUNCIL! WE WANT - indeed -WE CHOOSE TO REPRESENT OURSELVES! A few years ago; we voted IN FAVOR OF 'A SKID ROW NEIGHBORHOOD COUNCIL'! I KNOW that we WON! I KNOW that we qualified! I believe that there was BALLOT TAMPERING! I feel that there was FRAUD in counting THE SKID ROW NEIGHBORHOOD COUNCIL ballots etc! I know that this occurred just to keep BLACK PEOPLE and poor people from gaining GREATER, VOICE, CONTROL, PARITY, INFLUENCE in SKID ROW!

As a stakeholder in the Downtown area; I remain GREATLY concerned about HOUSING AS A HUMAN RIGHT! First and foremost; we need MORE available - AFFORDABLE HOUSING! In my opinion; The VERY FIRST priority should be housing the houseless, homeless, indigent of SKID ROW! The priority must NOT be BUILDING MORE EXPENSIVE CONDOMINIUMS for the wealthy and the affluent!

MAINTAINANCE, CLEANLINESS / SANITATION within the boundaries of SKID ROW is another HIGH priority!

Police Horse manure needs to be CONSISTENTLY CLEANED UP! IMMEDIATELY! Prolonging the CLEAN UP; allowing the manure to stay on the street increases and encourages the RISK and the spread of disease!

Veterans need to be housed! Veterans need benefits! They should not be living in the streets! They should be housed in SKID ROW and EVERYWHERE in America! RIGHT NOW! THIS IS A PRIORITY! I am taking this opportunity to advocate in favor of A VETERANS CENTER IN SKID ROW to further meet their needs!

I advocate for INCREASED GREEN SPACES in SKID ROW! I WANT LOVELY parks with BIG BEAUTIFUL TREES, flowers, MUCH GREEN GRASS etc; just like in affluent white and Jewish communities!

I would also like to see MORE ROOF TOP GARDENS IN SKID ROW!

I have been waiting for a .99 Store in Down Town since I moved here 17 years ago! I HOPE that I do NOT have to wait until 2040 to see it!

I want A SAFE SPACE! SAFE PLACE! REFUGE & RESPITE FOR WOMEN fleeing domestic violence, sex slavery, human sex trafficking etc! I want this in SKID ROW!

I WANT A DAYCARE CENTER SKID ROW repleat with sauna, steam room, recreation /game room, counseling facility, worship facility, meeting rooms etc!

I feel that there should be MORE SUPPORT FOR SMALL BUSINESSES in SKID ROW!

I oppose! I object to ADDITIONAL LIQUOR LICENSING IN SKID ROW! NO MORE! WE DO NOT WANT THIS! WE DO NOT NEED THIS!

NO MARIJUANA DISPENSARIES! NO FURTHER CRIMINALIZATION, INCRIMINATION! NO MORE EXPLOITATION OF THE POOR PEOPLE, BLACK PEOPLE, INDIGENT PEOPLE OF SKID ROW!

I DEMAND REPARATIONS! I DEMAND 40 ACRES AND 1 MULE FOR MYSELF AND OTHER BLACK AFRICAN AMERICAN DECENDANTS OF SLAVES! 40 ACRES AND 1 MULE roughly translates to 1 condominium and 1 car!

**WE WANT COMMUNITY! WE WANT REAL COMMUNITY! WE WANT PARITY!
NOT EXPLOITATION! NOT REGENTRIFICATION!**

Present and current residents / constituents of SKID ROW should not be / must NOT be displaced! WE SHOULD BE GIVEN PRIORITY IN HOUSING, EMPLOYMENT, BUSINESS OPPORTUNITIES etc!

Though I digress! I would like to take this opportunity to OFFICIALLY request that citizens / constituents be allowed to circulate at their own discretion! TOO MANY BUSINESSES ARE CLOSING DOWN! TOO MANY VITAL AND ESSENTIAL BUSINESS ARE SHUTTING DOWN! Many others; both residents and Business can not pay rent! Daily they face homelessness / houselessness! While being as CLEAN as possible; constituents and residents must be permitted to circulate at their own RISK and DISCRETION!

Sincerely,

Yvonne Michelle Autry

[Quoted text hidden]

[Quoted text hidden]

[Quoted text hidden]

[Quoted text hidden]

I would also like to take this opportunity to BOLDLY and officially STAND AGAINST MANDATORY SHOTS VACCINATIONS, VACCINES, INNOCULATIONS etc; which are a part of THE MARK OF THE BEAST!

Sincerely,

Yvonne Michelle Autry

Yvonne Autry <6976bellemichelle96@gmail.com>
To: downtownplan@lacity.org

Fri, Dec 18, 2020 at 8:00 PM

----- Forwarded message -----

From: **Yvonne Autry** <6976bellemichelle96@gmail.com>
Date: Fri, Dec 18, 2020, 7:49 PM
Subject: Fwd: SKID ROW 2040
To: <downtownplan@lacity.org>

----- Forwarded message -----

From: **Yvonne Autry** <6976bellemichelle96@gmail.com>
Date: Fri, Dec 18, 2020, 6:29 PM
Subject: Fwd: SKID ROW 2040
To: <downtownplan@lacity.org>, Yvonne Autry <6976bellemichelle96@gmail.com>, <6976bellemichelle@gmail.com>

----- Forwarded message -----

From: **Yvonne Autry** <6976bellemichelle96@gmail.com>
Date: Fri, Dec 18, 2020, 5:47 PM
Subject: Fwd: SKID ROW 2040
To: <downtownplan@lacity.org>

----- Forwarded message -----

From: **Yvonne Autry** <6976bellemichelle96@gmail.com>
Date: Fri, Dec 18, 2020, 5:34 PM
Subject: SKID ROW 2040
To:
Cc: Yvonne Autry <6976bellemichelle96@gmail.com>, <6976bellemichelle@gmail.com>

I am Yvonne Michelle Autry, 17 year stakeholder; living and working here in Down Town Los Angeles!

For the last 17 years now; I have been active with LACAN (Los Angeles Community Action Network), STOP LAPD SPYING, UCEPP (United Coalition East Prevention Project), LAPD (Los Angeles Poverty Department), DRAMASTAGE QUMRAN, CENTRAL CITY EAST - CHURCH OF THE NAZARENE, DLANC (Downtown Los Angeles Neighborhood Council), ORGANIZING SKID ROW NEIGHBORHOOD COUNCIL, UVP (Urban Voices Project) SKID ROW COMMUNITY IMPROVEMENT COALITION (SRCIC); most recently, I have been increasingly active with DWAC (Downtown Women's Action Coalition), THE PEOPLE CONCERN, ORGANIZING UNION DE VECINOS and last but not least: SKID ROW 2040!

I am concerned about the FUTURE of SKID ROW! I am supremely concerned with the FUTURE of DOWN TOWN proper, especially now at this time, reeling in the wake of this pandemic, even as REGENTRIFICATION continues!

My most pressing concerns include but are not limited to:

The people of SKID ROW want A SKID ROW NEIGHBORHOOD COUNCIL! WE WANT - indeed -WE CHOOSE TO REPRESENT OURSELVES! A few years ago; we voted IN FAVOR OF 'A SKID ROW NEIGHBORHOOD COUNCIL!' I KNOW that we WON! I KNOW that we qualified! I believe that there was BALLOT TAMPERING! I feel that there was FRAUD in counting THE SKID ROW NEIGHBORHOOD COUNCIL ballots etc! I know that this occurred just to keep BLACK PEOPLE and poor people from gaining GREATER, VOICE, CONTROL, PARITY, INFLUENCE in SKID ROW!

As a stakeholder in the Downtown area; I remain GREATLY concerned about HOUSING AS A HUMAN RIGHT! First and foremost; we need INCREASED ACCESSIBLE available - AFFORDABLE HOUSING! In my opinion; The VERY FIRST priority should be housing the houseless, homeless, indigent of SKID ROW! The priority must NOT be BUILDING MORE EXPENSIVE CONDOMINIUMS for the wealthy and the affluent!

MAINTAINANCE, CLEANLINESS / SANITATION within the boundaries of SKID ROW is another HIGH priority!

Police Horse manure needs to be CONSISTENTLY CLEANED UP! IMMEDIATELY! Prolonging the CLEAN UP; allowing the manure to stay on the street increases and encourages the RISK and the spread of disease!

Veterans need to be housed! Veterans need benefits! They should not be living in the streets! They should be housed in SKID ROW and EVERYWHERE in America! RIGHT NOW! THIS IS A PRIORITY! I am taking this opportunity to advocate in favor of A VETERANS CENTER IN SKID ROW to further meet their needs!

I advocate for INCREASED GREEN SPACES in SKID ROW! I WANT LOVELY parks with BIG BEAUTIFUL TREES, flowers, MUCH GREEN GRASS etc; just like in affluent white and Jewish communities!

I would also like to see MORE ROOF TOP GARDENS IN SKID ROW!

I have been waiting for a .99 Store in Down Town since I moved here 17 years ago! I HOPE that I do NOT have to wait until 2040 to see it!

I want A SAFE SPACE! SAFE PLACE! REFUGE & RESPITE FOR WOMEN fleeing domestic violence, sex slavery, human sex trafficking etc! I want this in SKID ROW!

I WANT A DAYCARE CENTER SKID ROW repleat with sauna, steam room, recreation /game room, counseling facility, worship facility, meeting rooms etc!

I feel that there should be MORE SUPPORT FOR SMALL BUSINESSES in SKID ROW!

I oppose! I object to ADDITIONAL LIQUOR LICENSING IN SKID ROW! NO MORE! WE DO NOT WANT THIS! WE DO NOT NEED THIS!

NO MARIJUANA DISPENSARIES! NO FURTHER CRIMINALIZATION, INCRIMINATION! NO MORE EXPLOITATION OF THE POOR PEOPLE, BLACK PEOPLE, INDIGENT PEOPLE OF SKID ROW!

I DEMAND REPARATIONS! I DEMAND 40 ACRES AND 1 MULE FOR MYSELF AND OTHER BLACK AFRICAN AMERICAN DECENDANTS OF SLAVES! 40 ACRES AND 1 MULE roughly translates to 1 condominium and 1 car!

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NOT EXPLOITATION! NOT REGENTRIFICATION!

Present and current residents / constituents of SKID ROW should not be / must NOT be displaced! WE SHOULD BE GIVEN PRIORITY IN HOUSING, EMPLOYMENT, BUSINESS OPPORTUNITIES etc!

Though I digress! I would like to take this opportunity to OFFICIALLY request that citizens / constituents be allowed to circulate at their own discretion! TOO MANY BUSINESSES ARE CLOSING DOWN! TOO MANY VITAL AND ESSENTIAL BUSINESS ARE SHUTTING DOWN! Many others; both resident and Business can not pay rent! Daily they face homelessness / houselessness! While being as CLEAN as possible; constituents and residents must be permitted to circulate at their own RISK and DISCRETION!

[Quoted text hidden]

Yvonne Autry <6976bellemichelle96@gmail.com>

Thu, Jan 7, 2021 at 8:51 PM

To: downtownplan@lacity.org, Yvonne Autry <6976bellemichelle96@gmail.com>, 6976bellemichelle@gmail.com

----- Forwarded message -----

From: **Yvonne Autry** <6976bellemichelle96@gmail.com>

Date: Thu, Jan 7, 2021, 8:48 PM

Subject: Fwd: SKID ROW 2040

To: Yvonne Autry <6976bellemichelle96@gmail.com>, <6976bellemichelle@gmail.com>

----- Forwarded message -----

From: **Yvonne Autry** <6976bellemichelle96@gmail.com>

Date: Sat, Jan 2, 2021, 12:06 PM

Subject: Fwd: SKID ROW 2040

To: <6976bellemichelle96@gmail.com>

----- Forwarded message -----

From: **Yvonne Autry** <6976bellemichelle96@gmail.com>

Date: Fri, Dec 18, 2020, 5:34 PM

Subject: SKID ROW 2040

To:

Cc: Yvonne Autry <6976bellemichelle96@gmail.com>, <6976bellemichelle@gmail.com>

I am Yvonne Michelle Autry, 17 year stakeholder; living and working here in Down Town Los Angeles!

For the last 17 years now; I have been active with LACAN (Los Angeles Community Action Network), STOP LAPD SPYING, UCEPP (United Coalition East Prevention Project), LAPD (Los Angeles Poverty Department), DRAMASTAGE QUMRAN, CENTRAL CITY EAST - CHURCH OF THE NAZARENE, DLANC (Downtown Los Angeles Neighborhood Council), ORGANIZING SKID ROW NEIGHBORHOOD COUNCIL, UVP (Urban Voices Project) SKID ROW COMMUNITY IMPROVEMENT COALITION (SRCIC); most recently, I have been increasingly active with DWAC (Downtown Women's Action Coalition), THE PEOPLE CONCERN, SKID ROW LIVE (video program), ORGANIZING UNION DE VECINOS and last but not least: SKID ROW 2040!

I am concerned about the FUTURE of SKID ROW! I am supremely concerned with the FUTURE of DOWN TOWN proper as well especially now at this time reeling in the wake of this pandemic, even as REGENTRIFICATION continues!

I know that we WON! I know that we qualified! I believe that there was some ballot tampering! FRAUD etc in the counting of THE SKID ROW NEIGHBORHOOD COUNCIL ballots etc! Just to keep BLACK PEOPLE and poor people from having a voice and gaining GREATER autonomy & control of SKID ROW!

As a stakeholder in the Downtown area; I remain GREATLY concerned about HOUSING AS A HUMAN RIGHT! First and foremost; we need MORE AFFORDABLE HOUSING! In my opinion; The VERY FIRST priority should be housing the houseless, homeless, indigent of SKID ROW! NOT BUILDING MORE EXPENSIVE CONDOMINIUMS!

MAINTAINANCE, CLEANLINESS / SANITATION is another priority!

Police Horse manure needs to be consistently and immediately CLEANED UP! Horse manure and human feces attract flies and circulate airborne bacteria!

Veterans need to be housed! Veterans need benefits! They should not be living in the streets! They should be housed! THIS IS A PRIORITY!

I advocate for INCREASING GREEN SPACES in SKID ROW such as parks with BIG BEAUTIFUL TREES, FLOWING, BILLOWING AND ABUNDANT GRASS if possible flowers etc; just like in affluent white and Jewish communities!

I want A SAFE SPACE! SAFE PLACE! REFUGE & RESPITE FOR WOMEN!

I WANT 'A DAYCARE CENTER' ON SKID ROW repleat with sauna, steam, recreation /game room, counseling facility, worship facility, meeting rooms etc!

I feel that there should be MORE SUPPORT FOR SMALL BUSINESSES!

I oppose! I object to ADDITIONAL LIQUOR LICENSING! NO MORE! WE DO NOT WANT THIS! WE DO NOT NEED THIS!

NO MARIJUANA DISPENSARIES! NO FURTHER CRIMINALIZATION, INCRIMINATION! NO EXPLOITATION OF THE POOR PEOPLE, BLACK PEOPLE, INDIGENT PEOPLE OF SKID ROW!

I DEMAND REPARATIONS! 40 ACRES AND 1 MULE FOR MYSELF AND OTHER BLACK AFRICAN AMERICAN DECENDANTS OF SLAVES!

WE WANT COMMUNITY! WE WANT REAL COMMUNITY! WE WANT PARITY!
NOT EXPLOITATION! NOT REGENTRIFICATION!

Sincerely,
Yvonne 'Michelle' Autry

Yvonne Autry <6976bellemichelle96@gmail.com>

Thu, Jan 7, 2021 at 8:57 PM

To: downtownplan@lacity.org, Yvonne Autry <6976bellemichelle96@gmail.com>, 6976bellemichelle@gmail.com

[Quoted text hidden]

I advocate for INCREASING GREEN SPACES in SKID ROW such as parks with BIG BEAUTIFUL TREES, FLOWING, ABUNDANT AND BILLOWING GRASS, flowers if possible etc; just like in affluent white and Jewish communities!

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I feel that there should be MORE SUPPORT FOR SMALL BUSINESSES!

MORE BLACK PEOPLE NEED TO BE HIRED FOR JOBS! NOT JUST MEXICAN - HISPANIC PEOPLE!

[Quoted text hidden]

Yvonne Autry <6976bellemichelle96@gmail.com>

Fri, Jan 8, 2021 at 3:35 AM

To: Yvonne Autry <6976bellemichelle96@gmail.com>, 6976bellemichelle@gmail.com, downtownplan@lacity.org

I am Yvonne Michelle Autry, 17 year stakeholder; living and working here in Down Town Los Angeles!

For the last 17 years now; I have been active with LACAN (Los Angeles Community Action Network), STOP LAPD SPYING, UCEPP (United Coalition East Prevention Project), LAPD (Los Angeles Poverty Department), DRAMASTAGE QUMRAN, CENTRAL CITY EAST - CHURCH OF THE NAZARENE, DLANC (Downtown Los Angeles Neighborhood Council), ORGANIZING SKID ROW NEIGHBORHOOD COUNCIL, UVP (Urban Voices Project) SKID ROW COMMUNITY IMPROVEMENT COALITION (SRCIC); most recently, I have been increasingly active with DWAC (Downtown Women's Action Coalition), THE PEOPLE CONCERN, SKID ROW LIVE (video program), ORGANIZING UNION DE VECINOS and last but not least: SKID ROW 2040!

I am concerned about the FUTURE of SKID ROW! I am supremely concerned with the FUTURE of DOWN TOWN proper as well especially now at this time reeling in the wake of this pandemic, even as REGENTRIFICATION continues!

I know that we WON! I know that we qualified! I believe that there was some ballot tampering! FRAUD etc in the counting of THE SKID ROW NEIGHBORHOOD COUNCIL ballots etc! Just to keep BLACK PEOPLE and poor people from having a voice and gaining GREATER autonomy & control of SKID ROW!

As a stakeholder in the Downtown area; I remain GREATLY concerned about HOUSING AS A HUMAN RIGHT! First and foremost; we need MORE AFFORDABLE HOUSING! In my opinion; The VERY FIRST priority should be housing the houseless, homeless, indigent of SKID ROW! NOT BUILDING MORE EXPENSIVE CONDOMINIUMS!

MAINTAINANCE, CLEANLINESS / SANITATION is another priority!

Police Horse manure needs to be consistently and immediately CLEANED UP! Horse manure and human feces attract flies and circulate airborne bacteria!

Veterans need to be housed! Veterans need benefits! They should not be living in the streets! They should be housed! THIS IS A PRIORITY!

I advocate for INCREASING GREEN SPACES in SKID ROW such as parks with BIG BEAUTIFUL TREES, FLOWING, ABUNDANT AND BILLOWING GRASS, flowers if possible etc; just like in affluent white and Jewish communities!

I want A SAFE SPACE! SAFE PLACE! REFUGE & RESPITE FOR WOMEN!

I WANT 'A DAYCARE CENTER' ON SKID ROW repleat with sauna, steam, recreation /game room, counseling facility, worship facility, meeting rooms etc!

I feel that there should be MORE SUPPORT FOR SMALL BUSINESSES!

MORE BLACK PEOPLE NEED TO BE HIRED FOR JOBS! NOT JUST MEXICAN - HISPANIC PEOPLE!

I oppose! I object to ADDITIONAL LIQUOR LICENSING! NO MORE! WE DO NOT WANT THIS! WE DO NOT NEED THIS!

NO MARIJUANA DISPENSARIES! NO FURTHER CRIMINALIZATION, INCRIMINATION! NO EXPLOITATION OF THE POOR PEOPLE, BLACK PEOPLE, INDIGENT PEOPLE OF SKID ROW!

I DEMAND REPARATIONS! 40 ACRES AND 1 MULE FOR MYSELF AND OTHER BLACK AFRICAN AMERICAN DECENDANTS OF SLAVES!

WE WANT COMMUNITY! WE WANT REAL COMMUNITY! WE WANT PARITY!
NOT EXPLOITATION! NOT REGENTRIFICATION!

Furthermore; since I have moved Downtown, within the last 17 years, there has been a consistent and STEADY INCREASE IN ILLEGAL ENTRIES, VANDALISM AND THEFTS perpetrated here! Residents of Apartments and lofts such as; THE ALEXANDRIA APARTMENT BUILDING, THE HAYWARD MANOR APARTMENTS, THE ROSLYN LOFTS, THE SIMONE and elsewhere here in the Down town vicinity ARE REPORTING THIS EVIL CRIMINAL INJUSTICE! BIRTHRIGHT CITIZENS, the majority of whom are Black, consistently experience ILLEGAL ENTRIES, VANDALISM, THEFT and or additional damage to our personal property! THESE organized Criminals - DEVILS & DEMONS HARASS AND SACRIFICE BLACK PEOPLE, animals AND WOMEN! I AM TIRED OF THIS! THIS CARNAGE, THIS GRAVE INJUSTICE MUST END! Thefts have occurred in LOFTS, APARTMENTS, laundry rooms etc! Stolen and damaged items include but are not limited to MAIL - this continues to happen to me (as mail tampering occurs) VALUABLE AND EXPENSIVE CAMERAS have been stolen as well as recording equipment, valuable and expensive photography EQUIPMENT, computers, printers, CD's, DVD's, animal - pets, rental receipts, money, jewelry, wheel chairs, T.V's, radios, medication! I have quite often and frequently returned home to find mold on my newly purchased food, HOLES in my PANTIES; holes in my towels, tote bags, holes in my other undergarments and clothing etc! THIS LARCENY! THIS THEFT and VANDALISM HAS GOT TO STOP! THE MAJORITY OF THESE MAINTAINANCE MEN ARE IN THIS COUNTRY ILLEGALLY! WHY CAN'T THEY BE DEPORTED! THEY MUST BE DEPORTED! THE POLICE ARE MURDERING BLACK MEN AND WOMEN; YET ICE & FEDERAL AGENTS CAN NOT SEEM TO BE ABLE TO DEPORT ILLEGAL IMMIGRANTS! THERE IS SOMETHING REALLY VERY UGLY ABOUT THAT PICTURE! YOU THINK THAT YOU CAN MURDER ALL OF THE BLACK PEOPLE WHILE REPLACING US WITH MEXICAN & HISPANIC PEOPLE AS THE BLUE COLLAR WORKING CLASS - SLAVES etc! WELL YOU CAN NOT! I DEMAND THAT YOU DEPORT ALL ILLEGAL ALIENS HERE IN THE DOWNTOWN AREA IMMEDIATELY! MANY OF THEM HAVE BEEN IDENTIFIED; BY NAME EVEN! THEY ARE MEXICAN MAFIA AND EL SALVADORAN MALA SALVATRUCHE 13 GANG! THEY ARE ORGANIZED CRIMINALS; THEY ARE MISOGYNISTS, SERIAL KILLERS, MURDERERS, RAPISTS, THIEVES, CHILD ABUSERS, PEDOPHILES, SEX PREDATORS, HUMAN SEX TRAFFICKERS, VAMPIRES, CANNIBALS, sex demon & SHAMAN DEVIL WORSHIPPERS, they kill women! They abuse cats and other animals: ESPECIALLY LITTLE BLACK CATS, DOGS etc! On behalf of many other AMERICAN CITIZENS who have experienced RECURRENT ILLEGAL ENTRIES, THEFT AND VANDALISM OF OUR PERSONAL EFFECTS; I DEMAND THAT FEDERAL AGENTS BE RESPONSIVE, AND THAT THEY DEPORT THESE ILLEGAL ORGANIZED CRIMINALS! ASAP! AS AN AMERICAN BY BIRTHRIGHT; I DEMAND JUSTICE! I DEMAND THIS RETRIBUTION AND RESTITUTION IMMEDIATELY!

I HAVE NEVER SEEN ILLEGAL IMMIGRANTS IN ANY OTHER COUNTRY AWARDED BRAND NEW CARS, BUSINESSES, JOBS, HOME LOANS, SCHOLARSHIPS AND HEALTH CARE BENEFITS! AS AN AMERICAN BY BIRTHRIGHT; THIS IS REPUGNANT AND QUITE DISGUSTING TO ME! THEY NEED TO BE DEPORTED! IMMEDIATELY! THEY ARE TAKING JOBS AND RESOURCES FROM OTHER BIRTHRIGHT AND NATURALIZED AMERICAN CITIZENS!

IN ADDITION, Since ILLEGAL IMMIGRATION HAVE INCREASED; SO HAS STALKING, SEXUAL PREDATION, SEXUAL HARASSMENT & MURDERERS OF WOMEN ESPECIALLY SINGLE BLACK WOMEN! MEXICAN MAFIA, EL SALVADORAN MALA SALVATRUCHE 13 GANG AND OTHER MEXICAN HISPANIC GANGS ROUTINELY MURDER THEIR OWN WOMEN AND CHILDREN! SOME COMMIT SUICIDE! THAT IS THEIR RITUAL AND EVIL BACKWARDS CULTURE OF MISOGYNY AND FEMICIDE! MOST ARE PEDOPHILES AS WELL! I HAVE SEEN MEXICAN WOMEN IN MEXICO, PERU AND OTHER CENTRAL AND SOUTH AMERICAN COUNTRIES PROTEST AND MARCH EXPOSING THE ALARMING NUMBERS OF DEAD AND MISSING WOMEN AND CHILDREN! THIS IS EVIL! THIS IS UNHOLY! THESE MEXICANS & HISPANIC ARE AN INVADING RACE OF DEVILS, DEMONS, WITCHES AND CHILDREN OF SATAN THE DEVIL! AS A CHRISTIAN; AS AN AMERICAN BY BIRTHRIGHT, I DEMAND THAT THEY BE DEPORTED! IMMEDIATELY! They bring PAGAN / HEATHEN sex gods and or blood gods!

I FURTHER DEMAND THAT THE LAWS IN PLACE PROTECTING WOMEN, CHILDREN AND ANIMALS BE STRENGTHENED AND FULLY ENFORCED - NOW -AND AT ALL TIMES!

Sincerely,
Yvonne 'Michelle' Autry

Brittany Arceneaux <brittany.arceneaux@lacity.org>
To: Yvonne Autry <6976bellemichelle96@gmail.com>
Cc: downtownplan@lacity.org, 6976bellemichelle@gmail.com

Mon, Jan 11, 2021 at 12:01 PM

Hi Yvonne,

Thank you, your comment has been received.

Best,
Brittany

[Quoted text hidden]

--



LOS ANGELES
CITY PLANNING

Brittany Arceneaux

She, Her, Hers

City Planner

Los Angeles City Planning

200 N. Spring St., Room 667

Los Angeles, CA 90012

Planning4LA.org

T: (213) 978-1911



Please note I am out of the office every other Friday.

Brittany Arceneaux <brittany.arceneaux@lacity.org>

To: Jordan Hallman <jordan.hallman@lacity.org>

Mon, Jan 11, 2021 at 12:01 PM

Hi! Do you mind adding this to the comment folder when you have a moment.

Best,
Brittany

[Quoted text hidden]

January 13, 2021

Brittany Arceneaux, City Planner
Department of City Planning
City of Los Angeles
200 North Spring Street, Room 667
Los Angeles, CA 90012

Sent via email due to the COVID-19 Pandemic to:

Brittany.arceneaux@lacity.org

Downtownplan@lacity.org

Dear Ms. Arceneaux,

I write on behalf of the Building Owners and Managers Association Greater Los Angeles (BOMA/GLA), one of the largest advocacy organizations in the commercial real estate industry, representing over hundreds of property owners and operators with over 135 million square feet of office space. We work tirelessly to ensure that our industry's voices are heard in policy spaces and are committed to the future of Downtown Los Angeles.

We are writing to you with suggestions regarding the City of Los Angeles Planning Department's DTLA 2040 plan. As an organization representing a significant amount of commercial property owners and managers in the Downtown Los Angeles corridor, we have seen first-hand the economic toll COVID-19 has had on our local businesses and tenants.

As the COVID-19 pandemic continues to create long-term economic impacts in our region, the City must strive to bolster Downtown's resiliency.

Since the onset of the pandemic, tenant occupancy has been as low as 10% in many major office buildings. With retail and restaurant establishments depending on a full and stable office workforce, many of them have lost considerable income for their establishments.

This is but one metric of the paradigm shift that COVID-19 has posed for DTLA.

As such, DTLA 2040 must be revised in a way that recognizes the challenges created by COVID-19.

Therefore, we believe that the DTLA 2040 plan should be viewed as more than just a roadmap for development. The City should use the plan as a re-investment strategy for DTLA in the wake of the pandemic. As a tool of economic recovery and revitalization, an updated DTLA 2040 plan would be instrumental in promoting growth in the area.

In coordination with the Los Angeles County Business Federation, the Central City Association and FASTLinkDTLA, we strongly recommend the following:

1. Jumpstart DTLA's economic recovery as a compact, walkable, transit-oriented and inclusive urban center and international destination. In 2019, DTLA experienced a record-breaking 22 million visitors and \$10 billion in visitor-related spending. Yet in the wake of the COVID-19 pandemic, tourism is at a standstill, with nearly 500,000 people in the visitor and service industry out of work. DTLA office space vacancy pre-COVID

was around 15%. Today, office buildings are 30% occupied on a good day, and more typically 10-20% occupied due to COVID. This vacancy has reverberations for all service sectors that depend on office buildings full of employees and retail and restaurants full of customers.

2. Increase height limits to ensure that new housing and commercial projects can “pencil out.” Post-COVID-19, development funding is scarce and cities throughout the country are competing for private development dollars by providing expedited processes. In order to deliver mixed-income housing, height limits and densities should be maximized, rather than minimized.
3. Maximizing density and expediting development processes. This will benefit the City of Los Angeles budget, and benefit DTLA’s safety, equity, livability, mobility and environment. It will also benefit the future Enhanced Infrastructure Finance District (EIFD), currently in the planning process for DTLA. As DTLA experienced with the Community Redevelopment Agency (CRA) before it was dissolved, the greater the allowable development in an area combined with an expedited development process, the greater the tax increment yield which expands funding resources for investments to address DTLA’s myriad housing, homeless and mobility needs in and around the future EIFD planned for DTLA.
4. The DTLA 2040 plan must allow the maximum zoning envelope and create an expedited pathway to deliver housing for all incomes, especially along current and planned transit routes.
5. Allow for many different housing options, including diverse typology, rather than requiring only single income development or single use typologies such as live/work in particular areas of DTLA. Increase opportunities for home ownership. More broadly, there should be a general increase in housing production opportunities such as increasing height limits, reducing entitlement hurdles, increasing streamlined processes for housing of all kind (affordable and market-rate) and reducing development fees. To deliver 120,000 mixed-income units in DTLA, residential development needs the fewest entitlement restrictions, as long as affordable and workforce housing can be included or contributed to as part of each project.

The revitalization of DTLA is a necessity for broader economic recovery if we want it to be equitable — it’s the once and future epicenter of LA’s housing, it has the biggest capacity for commercial activity per capita, and its capacity for density has essential sustainability implications.

DTLA was on track to become the urban core we all envisioned. COVID-19 was sadly a major setback as residents began to leave. Getting DTLA — and by extension LA in general from an economic, sustainability, and homelessness perspective — back on the track requires the suggested revisions by us, CCA, BizFed, and FastLinkDTLA.

Together, we can make DTLA both the epicenter of our economic recovery and vibrance for the coming decades.

Sincerely,



Aaron Taxy
Director of Government and Public Affairs
BOMA Greater Los Angeles
(213) 332-4776
ataxy@bomagla.org



Jordan Hallman <jordan.hallman@lacity.org>

Please support this plan

1 message

Kaseem Booker <kaseembooker@everyactioncustom.com>

Mon, Dec 14, 2020 at 2:13 PM

Reply-To: kaseembooker@gmail.com

To: downtownplan@lacity.org

Dear Downtown Plan,

Thank you for the opportunity to comment on the forthcoming update to the Downtown Community Plan. I'm writing on behalf of Abundant Housing LA, a pro-housing education and advocacy organization working to help solve Southern California's housing crisis. AHLA supports efforts to promote equity and reform land use regulations and zoning codes, and expand housing production at all levels of income.

As you know, the City of Los Angeles is suffering from a severe housing crisis. Exclusionary zoning, systemic racism, and longstanding constraints on denser housing production, combined with a lack of sufficient funding for affordable housing production and preservation, have led to a massive housing shortage. This has made Los Angeles one of the nation's most unaffordable housing markets. High rents and a lack of new housing opportunities have caused greater financial pressure on families, longer commutes, increasing carbon emissions, more displacement of historically disadvantaged communities, high homelessness, and reduced access to economic and educational opportunity. This has also reinforced longstanding patterns of income and racial segregation in our city's neighborhoods.

The Downtown Community Plan is an important step in meeting the needs of our Downtown residents, and its policies will promote more housing affordability.

I support the Plan for these reasons. I also ask for these additional changes to reduce car dependence and meet housing needs:

Restore the proposed base FAR from the summer 2020 version of the Plan, eliminate proposed maximum building heights, and implement the maximum bonus FAR proposed in the Draft Environmental Impact Report's Alternative 3.

Modify the requirement that residential buildings in Subarea A.3 that use the density bonus program must make at least 30% of the building's units two bedrooms or larger. Encourage production of affordable family units by introducing a "super-density bonus" tier throughout Downtown, for projects that make at least 30% of the building's two bedrooms or larger.

Introduce a parking maximum on new construction, and introduce a per-space fee on all existing and new parking lots and garages in Downtown.

Amend the Industrial-Mixed Use 2 (IX2) and Hybrid Industrial 2 (HI2) zones to allow all residential housing types. Do not restrict housing options in these areas to live-work units only.

A Downtown Community Plan update that incorporates these policies will help advance our common goals of housing affordability, socioeconomic equity, economic prosperity, and environmental sustainability. Thank you for your consideration, and for your hard work on this important project.

Personally sent by Kaseem Booker using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,

Kaseem Booker

418 N Norton Ave Los Angeles, CA 90004-3845

kaseembooker@gmail.com



Jordan Hallman <jordan.hallman@lacity.org>

Please support this plan

1 message

Alexander Booth <alexanderbooth@everyactioncustom.com>

Mon, Dec 14, 2020 at 3:51 PM

Reply-To: alexanderbooth@kfalosangeles.com

To: downtownplan@lacity.org

Dear Downtown Plan,

Thank you for the opportunity to comment on the forthcoming update to the Downtown Community Plan. I'm writing on behalf of Abundant Housing LA, a pro-housing education and advocacy organization working to help solve Southern California's housing crisis. AHLA supports efforts to promote equity and reform land use regulations and zoning codes, and expand housing production at all levels of income.

As you know, the City of Los Angeles is suffering from a severe housing crisis. Exclusionary zoning, systemic racism, and longstanding constraints on denser housing production, combined with a lack of sufficient funding for affordable housing production and preservation, have led to a massive housing shortage. This has made Los Angeles one of the nation's most unaffordable housing markets. High rents and a lack of new housing opportunities have caused greater financial pressure on families, longer commutes, increasing carbon emissions, more displacement of historically disadvantaged communities, high homelessness, and reduced access to economic and educational opportunity. This has also reinforced longstanding patterns of income and racial segregation in our city's neighborhoods.

The Downtown Community Plan is an important step in meeting the needs of our Downtown residents, and its policies will promote more housing affordability.

I support the Plan for these reasons. I also ask for these additional changes to reduce car dependence and meet housing needs:

Restore the proposed base FAR from the summer 2020 version of the Plan, eliminate proposed maximum building heights, and implement the maximum bonus FAR proposed in the Draft Environmental Impact Report's Alternative 3.

Modify the requirement that residential buildings in Subarea A.3 that use the density bonus program must make at least 30% of the building's units two bedrooms or larger. Encourage production of affordable family units by introducing a "super-density bonus" tier throughout Downtown, for projects that make at least 30% of the building's two bedrooms or larger.

Introduce a parking maximum on new construction, and introduce a per-space fee on all existing and new parking lots and garages in Downtown.

Amend the Industrial-Mixed Use 2 (IX2) and Hybrid Industrial 2 (HI2) zones to allow all residential housing types. Do not restrict housing options in these areas to live-work units only.

A Downtown Community Plan update that incorporates these policies will help advance our common goals of housing affordability, socioeconomic equity, economic prosperity, and environmental sustainability. Thank you for your consideration, and for your hard work on this important project.

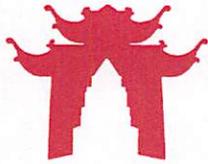
Personally sent by Alexander Booth using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,

Alexander Booth

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consequence of raising rents for smaller ground-floor spaces, thus driving away the small businesses the DTLA 2040 Plan intends to attract. Economic development is the appropriate tool to retain and attract small business—not land use.

The Community Benefits System is not financially feasible.

Development projects that do not exceed the maximum base building size and density are required to contribute to citywide public benefits. Specifically, the current Affordable Housing Linkage Fee and Quimby Fee will remain and continue with the adoption of DTLA 2040. Development projects that exceed the maximum base building size and density must contribute to citywide public benefits and participate in the Downtown Community Plan Community Benefits Program even though the HR&A Advisors summary analysis and recommendation report for the Community Benefits System recognizes the need for market maturity for neighborhoods including Chinatown, in order to support the provision of public benefits for larger projects. The City's own analysis calls into question the extent to which market conditions in Chinatown can support the requirements of the Community Benefits System for larger projects. Yet, development projects that take part in the Community Benefits System must also bear the costs of the citywide public benefits, likely making it virtually impossible for these projects to “pencil.”

Conclusion

The Chinatown Business Improvement District does not support the most recent draft of the DTLA 2040 Plan. Its provisions make it unnecessarily difficult to attract and make feasible the sort of development the Plan envisions. CBID cannot support the downzoning of our community—from a reduction in FAR from 6.0 to as little as 2.0 and the limit on hotel guest rooms to 49. Chinatown has already experienced a FAILED community benefits system with the CASP and now, the City proposes a community benefits system its own analysis recognizes cannot be supported for larger projects in markets like Chinatown. Chinatown cannot continue to be punished by untested (other than CASP) innovative land use policies, regardless of how well-intentioned.

Sincerely,

LOS ANGELES CHINATOWN BUSINESS COUNCIL

George Yu
Executive Director



Lew Horne
Division President, Advisory Services, Pacific Southwest

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January 13, 2021

Brittany Arceneaux, City Planner
City of Los Angeles Department of City Planning
200 North Spring Street, Room 667
Los Angeles, CA 90012
Via email: brittany.arceneaux@lacity.org

Re: Comments on the DTLA 2040 Community Plan Update

Dear Ms. Arceneaux,

I am the Divisional President for Advisory Services with responsibility for CBRE's business in the Pacific Southwest including Southern California, Arizona and Hawaii. CBRE (Coldwell Banker Richard Ellis) is the largest commercial real estate services and investment firm in the world.

In my role, I lead the strategic direction and performance of the firm's Advisory Services business, which includes Advisory & Transaction Services, Asset Services, Capital Markets, Local Project Management and Valuations.

I offer this letter to comment on the DTLA 2040 Community Plan Update and to raise specific issues within the plan that we believe inhibit much-needed housing production amid a housing and homelessness crisis and will hinder economic recovery from the COVID-19 pandemic and future economic growth.

We request the Department of City Planning consider the following issues:

Housing: We ask that the plan maximize capacity for new housing, as presented by Alternative 3 in the Draft Environmental Impact Report (DEIR). This also includes providing more flexibility for housing options in the Arts District and Fashion District, and not limiting housing to live/work units which are more costly and exclusionary. We also request that the ban on market rate housing around 5th to 7th and San Pedro to Central be lifted. We should create a socioeconomically integrated and healthy Downtown, not perpetuate failed containment policies.

Building Height Limits: Remove building height limits in Little Tokyo, the Arts District, Historic Core and parts of Chinatown -- these areas are all served by transit and should be places where we aim to maximize opportunities for new housing. Instead of height limits, utilize FAR and urban design tools like setbacks to govern building height and mass, which better aligns with the community benefits program to yield direct benefits and support Downtown's growth, and protect historic districts and buildings through the appropriate established landmarking processes.

Industrial Zoning: Do not include areas zoned exclusively for industrial uses -- these areas should instead provide more flexible zoning to allow them to gradually convert to other uses, including housing, over the long term. We have firsthand experience in repurposing industrial buildings to uses that can activate Downtown and spur economic activity. As industrial jobs have largely left Downtown, DTLA 2040 should provide a positive, mixed-use vision for the future of Downtown's industrial areas.

Design Requirements: We are concerned that the code is too specific in the Arts District and Historic Core and inhibits innovative, creative design. It would also go beyond the scope of any zoning code by dictating allowable building materials in the Arts District and virtually precluding the use of wood, the most affordable construction material. DTLA 2040 should promote flexibility, affordability and innovative design.

Community Benefits Program: To make the proposed Community Benefits Program feasible, we believe a more substantial FAR bonus for affordable housing in DTLA is necessary. High-rise concrete and steel construction in DTLA is more costly than mid-rise wood frame construction prevalent in the rest of the city, and a higher FAR bonus is needed to support feasibility of mixed-income projects. We also encourage you to restore previously proposed base FARs as the recent reductions in base FAR in Chinatown, Little Tokyo, Historic Core and the Fashion District are substantial and create de facto inclusionary housing in these areas, sharply impacting financial feasibility of projects there.

Approval Process: It's critical that the plan promotes by-right development and decreases the need for projects to be approved on a subjective, one-off basis under discretionary review. We want to ensure that the plan as a whole fosters feasible development, but also provides mechanisms for projects to obtain minor deviations without triggering the need for CEQA review.

Limits on Hotel and Ground-Floor Business Sizes: Hotels should not be limited to 49 rooms and ground-floor commercial establishments should not be limited to 5,000 square feet within Chinatown and Little Tokyo. Restricting hotels is antithetical to strengthening DTLA's role as a major visitor destination, and business square footage limits cannot ensure tenants are actually small businesses and would limit potential for desirable tenants.

Thank you for your time and consideration.

Warm regards,



Lew Horne
Divisional President
CBRE | Pacific Southwest



January 13, 2021

VIA Email to downtownplan@lacity.org

Attn: Brittany Arceneaux, Project Manager
Downtown Community Plan
Los Angeles Department of City Planning
200 N. Spring St., Room 667
Los Angeles, CA 90012

RE: CCU written comments for Public Hearing on Cases CPC-2017-432-CPU and CPC-2014-1582-CA.

Dear Ms. Arceneaux:

We are pleased to offer the following written comments for the Public Hearing record in Cases CPC-2017-432-CPU and CPC-2014-1582-CA regarding the November 2020 Draft Downtown Community Plan Text, Plan Map, Zoning Map, and Zoning Code. The Central City United (CCU) Coalition, led by the Southeast Asian Community Alliance (SEACA), Little Tokyo Service Center (LTSC) and the Los Angeles Community Action Network (LA CAN), as key stakeholders in Chinatown, Little Tokyo, and Skid Row, along with Public Counsel, offer this feedback as a result of our collective community engagement efforts. Our recommendations prioritize affordable and supportive housing, promote inclusive economic development, strengthen community leadership, create healthy neighborhoods, and sustain the culture of existing neighborhoods and people.¹ We believe these recommended amendments are a step towards a Downtown where all communities—especially low-income communities, immigrants, and unhoused people—can live, work, and thrive.

We appreciate your consideration of these recommendations and look forward to continued conversations and collaboration to ensure an equitable and inclusive Downtown Community Plan.

I. The DTLA community plan should maximize new deeply affordable and supportive housing.

The City has long been in an affordable housing and homelessness crisis. The DTLA community plan update is an important opportunity to increase the supply of deeply affordable and supportive housing while preserving existing affordable housing and preventing displacement. CCU strongly supports the changes made in the November 2020 Draft Downtown Community Plan (“November 2020 Draft” or “Draft Plan”) to increase the affordability requirements in the Community Benefits Program (“CB Program”). But more changes are needed to maximize new

¹ All of CCU’s recommendations can be found at <https://www.centralcityunited.org/>.

deeply affordable and supportive housing. The Downtown Community Plan (“the Plan”) should align all upzoning with affordable housing and community benefits, require affordable housing at rates high enough to achieve effective value capture, and ensure that the affordable housing incentives do not have loopholes and are aimed at producing the maximum number of on-site Deeply- and Extremely Low-Income units—which are the most needed units in our communities.

A. Align all upzoning with affordable housing and community benefits.

The Plan should set base FARs at or below the development potential of the current zoning, while including higher bonus FAR that is aligned with affordability standards. Increasing the base FAR above current density standards merely confers new value without any corresponding community benefits and undermines the effectiveness of the entire incentive structure. **CCU strongly supports amendments in the November 2020 Draft that set the base FAR at rates consistent with existing density allowances in many areas of Chinatown.** This change will significantly improve the effectiveness of the Plan’s value capture mechanisms and, if paired with our recommendations in section II, will reduce the risk of tenant-occupied properties being redeveloped without safeguards to ensure replacement of RSO units, relocation support for tenants, and a true right of return. However, the Draft Plan still proposes to increase the base zoning without corresponding affordability in other plan areas. This is leaving much needed affordable housing and community benefits on the table, undermines existing state and local laws that align density increases with affordability, and is therefore inconsistent with the requirement that Community Plan updates not “reduce the capacity for creation and preservation of affordable housing and access to local jobs; or undermine California Government Code Section 65915 or any other affordable housing incentive program.”² We encourage the Department to correct these issues before plan adoption.

B. Revise the community benefits program to require affordable housing based on the proportional increase in development capacity by bonus FAR.

The affordable housing set-aside should be determined by the overall density increase. The affordability standards for Level 2 are not properly aligned with density increases. Each project should be required to first meet Level 1 requirements (35% increase). Level 2 affordability requirements should be dictated according to tiers of overall density increase. A project could choose to secure all of the remaining bonus FAR by providing affordable housing, or could combine the Level 2 affordable housing incentive with other Level 2 community benefits, up to the bonus FAR. Ultimately, the total percent increase in FAR attributed to the Level 2 affordable housing incentive should determine the total amount of on-site affordable housing provided.

The current Draft Plan Level 2 incentives are an unusual value capture scheme that provide fixed 1.0 FAR increases in exchange for a percentage of affordable housing based on the total units. This results in the incentives being more lucrative in areas with low base FAR than in areas with high base FAR. Not only is this unlike any other value capture system we are aware of, it also results in inequitable impacts.

² Los Angeles Municipal Code Section 11.5.8.A.

C. Remove incentivizes for Moderate-and Above-Moderate Income units, which conflict with state density bonus law and are inconsistent with the greatest need.

The Draft Community Benefits (CB) Program appears to provide that a housing development may receive a 35% density increase (Level 1) by providing “Set E” affordability standards, which includes an option to provide 40% Moderate-Income (120% AMI) units. The Draft CB Program further provides that a housing development may exceed this initial 35% density increase by providing an additional 4.5% increase in Moderate-Income or Above Moderate-Income (150% AMI) units. This is inconsistent with state density bonus law and undermines efforts to prioritize affordable housing for those most in need. First, state density bonus law very plainly restricts the provision of a Moderate-Income incentive only to for-sale Common Interest Development projects. The City’s TOC does not offer any Moderate-Income incentive for for-sale or rental projects. Therefore, by allowing rental housing developments a density increase for inclusion of Moderate-Income units, the Draft CB Program would be inconsistent with both state law standards and local programs. Moreover, there is no incentive whatsoever in state density bonus law or the TOC for so-called “Above Moderate-Income” units. But the Draft CB Program would reward the provision of such units with the exact same bonus as it provides to projects that include additional Low-Income (LI) units in Level 2. This deviates from, and is fundamentally inconsistent with, the structure of the TOC and state density bonus law. Second, including Moderate- and Above Moderate-Income options undermines the Draft Plan’s ability to respond to our most pressing housing needs. The vast majority of Los Angeles renters (nearly 70%) are lower-income, with most being Very Low- (VLI) or Extremely Low-Income (ELI).³ Despite this, the City already consistently produces far more Above Moderate-Income housing than lower-income housing. At this point in the 2013-2021 RHNA cycle, the City produced more than twice the amount of Above Moderate-Income housing as the identified need, while building only a fraction of the lower-income housing needed. The CB Program should focus incentives where the need is greatest: on lower-income housing.⁴

D. The Deeply Low-Income (DLI) and Extremely Low-Income (ELI) affordability requirements should be increased.

CCU strongly supports the inclusion of Deeply- and Extremely-low income affordability levels in the Draft CB Program. There is a clear need to prioritize units at these affordability levels in our communities. And we appreciate the changes to the most recent November 2020 Draft Plan that increased the Set E affordability requirements, which were set below TOC standards in previous drafts. However, the amount of units required by the Draft CB Program at Deeply- and Extremely-low affordability levels is too low, undercutting the entire incentive structure. **The Set E affordability requirements should be adjusted to require 8% DLI units, 9% ELI units, 11% VLI units, or 20% LI units based on the total number of units in the project.** Increasing the DLI and ELI requirements to 8% and 9% respectively will result in approximately the same amount of foregone rent as the 11% VLI option at current market rents for new

³ U.S. Department of Housing and Urban Development. Office of Policy Development and Research. Consolidated Planning/CHAS Data. <https://www.huduser.gov/portal/datasets/cp.html>.

⁴ The City’s 2018 RHNA Annual Progress Report is available at https://planning.lacity.org/odocument/e9ae0d56-b01b-443e-a3d6-7a86c6e88dea/2018_APR.pdf.

construction Downtown. This will result in more Deeply- and Extremely-Low Income units and create a more balanced incentive structure.

E. The current Draft Community Benefits Program allows affordable housing obligations to be satisfied with off-site units or in-lieu fees, which is inconsistent with existing incentive programs and would intensify exclusionary development Downtown.

The CB Program should be a tool to promote equity. Allowing developers to satisfy affordable housing obligations through off-site construction or an in-lieu fee undermines this goal by separating the residents of new market-rate construction from the residents of affordable housing, and exacerbates segregated development patterns and exclusive luxury enclaves to the detriment of a diverse and dynamic community. Including in-lieu and off-site options is also inconsistent with tried-and-true value capture policies, such as state density bonus law and the TOC, neither of which permit projects to access density incentives without on-site affordable housing. Aligning FAR bonuses with on-site affordable housing is the simplest way to ensure that the required affordable housing is built in the areas affected by new market-rate construction, and is built simultaneously and of comparable quality to market-rate units. The Draft CB Program should remove all options that allow developers to meet affordable housing requirements through off-site construction or payment of a fee.

F. Add new goals, Policies, and Program to maximize new deeply affordable and supportive housing.

We appreciate the changes made to the Draft Plan Text that added more Goals, Policies, and Programs aligned with CCU's recommendations. However, Planning should further bolster and add teeth to these Goals, Policies, and Programs by incorporating all of the recommendations in CCU's detailed redline of the Plan Text. Specifically, our detailed redline suggests new Goals, Policies, and Programs that prioritize the creation and preservation of deeply affordable housing, including prioritizing deeper affordability for residents most at-risk of homelessness; supporting land acquisition by community land trusts and affordable housing developers; supporting the adoption of a vacancy tax; removing obstacles and creating innovative strategies to support permanent supportive housing; and implementing social housing models.

II. The DTLA Community Plan should do more to support and protect the rights of unhoused residents.

The Plan area is home to thousands of homeless residents. Skid Row alone has the highest concentration of unsheltered individuals anywhere in the nation. On any given night, nearly 4,700 people are homeless and over 2,000 people sleep on the sidewalks in this 54-block area of Los Angeles.⁵ Supporting and protecting the rights of unhoused residents should be a top priority for the City and for the Plan.

⁵ <https://www.lahsa.org/documents?id=4700-2020-greater-los-angeles-homeless-count-skid-row>.

A. Expand the IX1 district for greater coverage of 100% affordable housing standards.

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 Plan where residential uses are restricted to only affordable housing. There are important additional areas of the adjacent Skid Row and Little Tokyo communities not currently covered by this use district that need the affordable housing prioritization of 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, Central Avenue, 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).

Furthermore, in areas near Skid Row and Little Tokyo, the Draft Plan would rezone many parcels to allow residential use where it was not previously allowed - effectively a residential density increase - with no affordable housing requirement. The Plan should include a requirement for on-site affordable housing to mitigate indirect displacement from new, predominantly market-rate housing wherever zone changes on parcels near this area permit multi-family residential use where previously prohibited.

B. Add new Goals, Policies, and Programs to better account for the needs of houseless residents, strengthen Skid Row assets, and advance accountable community development in the Skid Row neighborhood.

In addition to changes to the zoning map and zoning code, the Plan text should be amended to incorporate Goals, Policies, and Programs relating to better account for the needs of houseless residents, strengthen Skid Row assets, and advance accountable community development in the Skid Row neighborhood. On December 20, 2019, CCU submitted a detailed list of proposed amendments to the Plan text.⁶ While a handful of these amendments have been addressed in subsequent drafts, many have not. In summary, we asked that the Plan text be amended to:

- Ensure equitable design standards that prevent hostile architecture and design, and other tactics that impede houseless residents' ability to rest.
- Add Policies and Programs to create new public health infrastructure, such as rest stops with hygiene services like showers, restrooms, and cold drinking water, along with social service outreach, at sites that are linked to social spaces like parks, community centers, and transit stops.
- Add a Program to create and implement a strategy to end the criminalization of houselessness and divert criminal enforcement spending to instead support increased access to public health infrastructure, quality healthcare, social services, and affordable and supportive housing.
- Add new Goals, Policies, and Programs to strengthen Skid Row assets and advance accountable community development in the Skid Row neighborhood, including:

⁶ CCU's recommendations are available at <https://static1.squarespace.com/static/5e2f9c1251bedc373bccf0fa/t/5e335a0b78d5f55da090bca5/1580423692912/CCU+Proposed+Amendments+to+July+2019+Draft+DTLA+Community+Plan+Policy+Text.pdf>.

Requiring all new housing development in Skid Row to be 100% affordable to Low-, Very Low-, Extremely Low-, or Deeply Low-Income households; creating new social services sites that are linked to public social spaces like parks, community centers, and transit stops; working with Skid Row residents and community-based organizations to establish a bike infrastructure plan to ensure zero traffic fatalities; ensuring that City funding for arts and culture programming and staffing is proportionally allocated to Skid Row; maintaining 24-hour restroom access and frequent upkeep in all Skid Row parks; and employing Skid Row residents to conduct bulky item pick-ups and street sweeping to prevent trauma associated with a history of confiscation and destruction of vital personal property.

III. The DTLA Community Plan update can do more to protect renters and prevent homelessness.

The Plan must address displacement risks head-on and include meaningful zoning restrictions, as well as Goals, Policies and Programs that create real tools to minimize displacement, close the eviction pipeline to homelessness, and promote community stability. Development projects using incentives available through the CB Program should comply with high standards requiring replacement of demolished units, enhanced relocation assistance, and a true right to return at an affordable rent.

A. Adopt a Community Plan-wide universal replacement requirement.

One of the primary stated goals of the Plan update is to increase the Plan area's capacity for new housing. But increasing the supply of housing also requires preserving the Plan area's existing housing. To ensure that new projects produce a net gain in affordable housing, *all* projects that demolish rent stabilized housing, or housing affordable to or occupied by lower-income households, should be required to replace these units on a one-for-one basis. Units should be replaced at all lower-income affordability levels, including DLI, ELI, VLI, and LI.

B. Add enhanced relocation requirements and a right of return for projects using CPIO incentives.

In addition to requiring all projects to provide one-for-one replacement of RSO units and units occupied by or affordable to households at all lower-income affordability levels, projects that use the development incentives in the CPIO should be held to a higher standard and required to provide enhanced relocation assistance and a true right to return to a comparable unit in the new project at an affordable rent.⁷

If a developer makes use of the development incentives in the CPIO, each tenant should be entitled to enhanced relocation assistance and support to compensate the tenant for moving and to guarantee that a tenant can remain in their neighborhood while the new project is completed.

⁷ These obligations and incentives should in no way provide an exception to, or otherwise obviate, the obligations of developers and landowners under the Rent Stabilization Ordinance, Residential Hotel Preservation Ordinance, and any other obligations related to preservation and replacement of affordable housing and the rights of displaced tenants to remain, access or return to such housing.

The enhanced relocation assistance program should be structured to avoid affecting a tenant's eligibility for public benefits.

Additionally, displaced tenants must have a meaningful right of return upon completion of the new project. Developers should be responsible for maintaining contact information for all displaced tenants and should provide at least 90 days of notice of right to return to former tenants prior to the completion of the replacement unit. Tenants displaced from the project site must have a right of first refusal to rent the replacement units at a permanently affordable rent.

C. Provide additional assessment and amendments to prevent eviction and demolition of rent-stabilized units.

The Plan must be very careful about where and how development incentives are applied. The Department should carefully study and disclose the location of existing rent-stabilized units and units occupied by lower-income residents throughout the community plan area, and assess how the proposed zone changes and Draft CB Program will affect these tenants and housing stock. Based on this analysis, the Draft CB Program and Draft CPIO should be amended to include policies and restrictions to ensure the preservation of existing rent-stabilized units and prevent the eviction or displacement of current tenants

Tens of thousands of tenants currently live in rent-stabilized units in Downtown LA. Without policies to prevent displacement of current tenants, there is a risk that the community benefit programs aimed at producing new affordable housing and other benefits to the neighborhood will do more harm than good by allowing existing tenants to be displaced while producing little net affordable housing. The Department should conduct a careful assessment of this issue as soon as possible to allow residents to understand how the proposed changes will affect their communities, and should commit to all changes necessary, including those outlined above, to prevent the eviction of current tenants and/or demolition of important rent-stabilized housing stock.

D. Add new Goals, Policies, and Programs relating to equitable development without displacement, healthy and safe housing, and affordable housing preservation.

In addition to changes to the zoning code and CPIO, the Plan Text should be amended to incorporate Goals, Policies, and Programs relating to racial equity, equitable development without displacement, healthy and safe housing, and affordable housing preservation. On December 20, 2019, CCU submitted a detailed list of proposed amendments to the Plan text.⁸ While a handful of these amendments have been addressed in subsequent drafts, many have not. In summary, we asked that the Plan text be amended to:

- Add new Goals relating to equitable development without displacement, healthy and safe housing, and affordable housing preservation.

⁸ CCU's recommendations are available at <https://static1.squarespace.com/static/5e2f9c1251bedc373bccf0fa/t/5e335a0b78d5f55da090bca5/1580423692912/CCU+Proposed+Amendments+to+July+2019+Draft+DTLA+Community+Plan+Policy+Text.pdf>.

- Add new corresponding Policies with strong and explicit language to preserve rent stabilized units, coordinate anti-displacement efforts with community based organizations, enhance tenants’ rights enforcement, eliminate Ellis Act evictions, expand universal just cause eviction protections, adopt a permanent and fully funded right to counsel, adopt strong anti-harassment standards, restrict demolitions and condominium conversions, and implement a strong Community Plan Area no-net-loss program.
- Add new Programs that prioritize and commit City resources to: implementing a Community Plan Area no-net-loss program; preventing the conversion or demolition of residential hotels and enforcing the rights of residential hotel tenants through additional resources and proactive enforcement of the Residential Hotel Ordinance and Wiggins Settlement; adopting condo conversion and demolition annual allowances; studying and implementing policies to eliminate Ellis Act evictions; enhancing habitability standards; and adopting universal just cause eviction protections, fully funded right to counsel, anti-tenant harassment, and a program to cancel rent and mortgage relief during the COVID-19 pandemic.

IV. The DTLA Community Plan can do more to build an inclusive Downtown economy.

The Plan is also an opportunity to advance more equitable economic development policies. The Plan should prioritize and incentive additional non-residential community benefits that are much needed in our communities, ensure equitable commercial development, and include more Goals, Policies, and Programs to ensure low-income workers and entrepreneurs are supported Downtown.

A. Amend the Community Benefits Program and CPIO to incentivize additional non-residential community benefits that will contribute to an inclusive economy.

The Draft CPIO appears to allow development projects to receive an additional 1.0 FAR for each 2.5% incremental increase in floor area above a minimum 5,000 square feet, dedicated to: on-site childcare, schools and libraries, Social Services, Public Facilities, and Regional Mobility Hubs.⁹ The Draft CB Program and Draft CPIO should incentivize additional community benefits by including the following additional Community Facilities:

- Reduced Rent Community-Serving Small Business, defined as “a privately-owned corporation, cooperative, non-profit, social enterprise or other entity that has a long-term lease guaranteeing below market rate rent and serves the local neighborhood by employing local residents or providing culturally appropriate and/or needed goods or services for a mixed-income community, and meets at least three of the following four standards: (a) has no more than twenty-five employees/shareholders; (b) is not franchised or affiliated with a national chain; (c) pays all employees a living wage; (d) has been operating in the Community Plan Area for at least 15 years.”
- Adult Day Care facility, defined as “a non-residential facility that supports the health, nutritional, social, and daily living needs of adults in a professionally staffed, group setting.”

⁹ These ratios should be adjusted to have a cost comparable to the affordable housing requirements recommended above.

- Sidewalk Vendor Commissary, defined as “a food facility, approved by the Los Angeles County Department of Public Health to accommodate all operations necessary to support mobile food facilities and is made available exclusively to Sidewalk Vendors.”

Furthermore, non-residential community benefits should be provided for a duration comparable to that of affordable housing. Specifically, instead of a 10-year requirement, non-residential community benefits should be provided for at least 55 years.

B. Require continued discretionary review as necessary to ensure equitable commercial development.

It is important to encourage and support Community-Serving Small Businesses and promote microentrepreneurship across the diverse Downtown communities. However, a comprehensive and nuanced approach to inclusive economic development requires additional restrictions and discretionary review procedures for certain types of commercial development, such as luxury hotel development, to appropriately evaluate impacts, ensure that affordable housing is prioritized, and protect existing commercial assets.

C. Add new Goals, Policies, and Programs that prioritize the creation of a more inclusive economy in Downtown.

In addition to changes to the zoning code and CPIO, the Plan text should be amended to incorporate Goals, Policies, and Programs relating to racial equity, equitable development without displacement, healthy and safe housing, and affordable housing preservation. On December 20, 2019, CCU submitted a detailed list of proposed amendments to the Plan Text.¹⁰ While a handful of these amendments have been addressed in subsequent drafts, many have not. In summary, we asked that the Plan text be amended to add new Goals, Policies, and Programs that prioritize the creation of a more inclusive economy in Downtown, including: local and targeting hiring programs; living wage standards; local procurement policies; incentives, long-term leases and designated retail space for Community Serving Small Businesses; community-ownership of new commissaries and commercial kitchens to support low-income entrepreneurs in the food sector; increased resources for low-income entrepreneurs; anti-displacement protections for Community Serving Small Businesses; programs to mitigate harms and promote equity in Opportunity Zones; and community-ownership of creative space, including incubators, studio space, and art production and exhibition space.

V. Advance environmental justice, health and community resilience.

The Plan update is an opportunity to advance environmental justice and improve the health and resilience of low-income communities. The COVID-19 pandemic has highlighted in grim detail the extent to which lower-income communities bear the brunt of harm during emergencies. This is certainly true for hazards such as excessive heat and cold, climate events, unhealthy air quality, heavy rainfall, and other natural and manmade hazards. The Plan update can begin to

¹⁰ CCU’s recommendations are available at <https://static1.squarespace.com/static/5e2f9c1251bedc373bccf0fa/t/5e335a0b78d5f55da090bca5/1580423692912/CCU+Proposed+Amendments+to+July+2019+Draft+DTLA+Community+Plan+Policy+Text.pdf>

address this by including incentives for community benefits, as well as Goal, Policies, and Programs, that will help build healthy and resilient communities.

A. Amend the Community Benefits Program to incentivize additional non-residential community benefits that will contribute to a healthy and resilient community.

The Draft CB Program and Draft CPIO should incentivize additional community benefits by including the following additional alternative community benefits:

- Publicly Accessible Outdoor Amenity Space, as defined in the Draft CPIO should be amended to require that the space be open hours comparable to those of City parks and facilities, or longer, include clear signage indicating that the space is open to the public, and include seating/gathering spaces that accommodate the needs of seniors and persons with disabilities.
- Resiliency Centers, that offer temporary shelter and relief during disasters and climate events such as exceptional heat and cold, heavy rainfalls, earthquakes, and unhealthy air quality, and which are easily accessible to houseless persons, youth, seniors, people with disabilities, and other residents at-risk during emergency and climate events.

B. Add new Goals, Policies, and Programs that prioritize environmental justice and community healthy and resiliency in Downtown.

In addition to changes to the zoning code and CPIO, the Plan text should be amended to incorporate Goals, Policies, and Programs relating to racial equity, equitable development without displacement, healthy and safe housing, and affordable housing preservation. On December 20, 2019, CCU submitted a detailed list of proposed amendments to the Plan text. While a handful of these amendments have been addressed in subsequent drafts, many have not. In summary, we asked that the Plan text be amended to include: an assessment of park and public open space equity outcomes in Downtown, including an assessment of citywide park programming and spending to ensure that historically disinvested and park-poor low-income neighborhoods are prioritized; new programs to address disparities in park and public open space access, staffing, and funding; programs to prevent “green gentrification” in neighborhoods along the LA River by prioritizing new affordable housing, displacement avoidance policies, employment opportunities and support for Community Serving Small Businesses; tools to prevent the negative health consequences of displacement consistent with the City’s Plan for Healthy Los Angeles and the Sustainable City pLAN; and resources to enable healthy, affordable, and culturally relevant food retail.

VI. Replace TFAR with a well-crafted Community Benefits Fund.

The Downtown TFAR program has failed to meet the needs of, and in many cases harmed, low-income downtown residents. **We support the Plan’s change to remove the TFAR incentive from Level 3 and replace it with a Community Benefits Fund.** On October 15, 2020, we submitted recommendations to Planning on how a Community Benefits Fund should be structured. Instead of TFAR, the Plan should create a Community Benefits Fund that allows projects in certain areas to acquire additional development rights by contributing to a fund that

supports significant benefits identified by low-income communities, is transparently managed, and is subject to meaningful community oversight. The new Community Benefits Fund should have the following characteristics:

- Require new on-site affordable housing for participating residential projects and targeted economic justice programs for participating non-residential projects. Residential projects should be required to first include a baseline of deeply affordable on-site units. Non-residential projects should be required to first provide certain economic justice benefits on-site – such as Publicly Accessible Open Space, space for Reduced Rent Community Serving Small Businesses, Sidewalk Vending Commissary space, or Resiliency Centers.
- Require a meaningful fee contribution from participating projects. For example, if the Fund allows developers to access incentives that would otherwise be accessed through on-site affordable housing, the fee amount should be calculated to cover the cost of building the same number of affordable housing units elsewhere in the Community Plan Area.
- Allocate funds to a targeted list of housing and economic justice programs, including: land acquisition by community land trusts, seeding an “opportunity to purchase” program to enable community acquisition and ownership of housing assets; creation of new 100% affordable and supportive housing; grants for microentrepreneurs; rent subsidies to Community Serving Small Businesses; piloting a Legacy Business Program to explore ways to ensure the longevity of community-serving institutions; design and procurement of sidewalk vending carts that comply with relevant food safety regulations for donation to sidewalk vendors; amenities needed by houseless residents, such as no-fee ATMs, free high-quality wireless internet, drinking fountains, shade structures, free phone charging stations; emergency cash assistance for low-income residential and commercial tenants at risk of displacement; and piloting a Universal Basic Income program.
- Ensure transparent accounting and disbursement of funds. The Fund should also include the creation of an oversight commission comprising downtown residents affected by the affordable housing and eviction crisis, including at least 50% current or former houseless residents, properly trained and empowered to adopt guidelines for Fund applications and disbursement, review and approve applications, and receive periodic progress reports from city staff on implementation, enforcement, and spending of program revenue.

VII. The Plan should play a more forceful role in creating a racially just city by conducting a Racial Equity Analysis of the Draft Plan.

Los Angeles’ history is full of racist and discriminatory land use practices where certain populations and neighborhoods prospered at the expense of others. As we described in the CCU People’s Plan, “racial covenants, single-family zoning, and urban renewal are just a few examples of both explicit and masked efforts to protect white homeowners from others. In fact, each of our three neighborhoods – Chinatown, Little Tokyo, and Skid Row – were originally created to specifically segregate low-income immigrant and houseless residents from the rest of the City. In turn, many of the community organizations that work in these communities were established specifically to mitigate the harms caused by these place-based policies. In more recent years, much has been made of the ‘revitalization’ or ‘resurgence’ of Downtown. But in too many instances, the policies and practices driving this ‘resurgence’ have caused more harm

than benefit to low-income Downtown residents, including increased criminalization of unhoused residents and gentrification-fueled displacement and destabilization of low-income and immigrant communities – disproportionately harming communities of color.”¹¹

We appreciate DCP’s recognition that it must not only reflect on the role of planning in driving racial injustice, but it must also forcefully act to dismantle racist structures and systems and advance racially equitable practices.¹² Pursuant to the Mayor’s Executive Order No. 27, the Department has named a Chief Equity Officer and has begun developing a Racial Equity Action Plan. We applaud these steps, but more can and must be done. Critical to crafting Racial Equity Action Plan is an understanding of the existing racial disparities and their historical origins.

To that end, the City should conduct a Racial Equity Analysis of the Draft Plan, similar to what the cities of Seattle¹³ and Oakland¹⁴ have done with their land use planning efforts. This must include but should not be limited to evaluating the following questions:

- Is the intensity of expected growth in Downtown likely to have an impact on displacement of traditionally excluded populations? Excluded populations are those that have been historically oppressed and continue to deal with oppressive and discriminatory forces because of factors such as race, sex, gender, age, and/or status. Examples include but are not limited to persons and communities of color, immigrants and refugees, English language learners, and low-income residents.
- Is the intensity of expected growth in Downtown likely to have an impact on traditionally excluded populations’ access to key determinants of physical, social, and economic well-being?
- Will the Plan’s impacts disproportionately affect traditionally excluded populations?
- What strategies and levels of investment are necessary to mitigate the impacts of expected growth and to maximize opportunities for equitable outcomes?

The analysis must also incorporate a detailed and nuanced understanding of the diversity within individual communities and how the Plan’s impacts on traditionally excluded communities are compounded for those facing multiple challenges such as race and immigration status, age, gender, and/or limited English proficiency.

Lastly, the analysis must also include a binding implementation plan outlining all of the programs, policies, and zoning standards specifically designed to mitigate any potential harms and create community stability and economic mobility for current residents, workers, and community serving small businesses in areas where new development could lead to displacement

¹¹ Central City United, “People’s Plan” at p. 3.

<https://static1.squarespace.com/static/5e2f9c1251bedc373bccf0fa/t/5e334c9e74383164f98c2bd9/1580420261516/CUPP2020-Download-FINAL.pdf>.

¹² Los Angeles Department of City Planning, Press Release, “Largest U.S. Planning Department Stewards Its First Chief Equity Officer Appointment,” August 10, 2020. https://planning.lacity.org/odocument/bb80dfec-e843-4bf0-8774-1e917ef68e04/202008_ChiefEquityOfficer-PressRelease-English.pdf.

¹³

<http://www.seattle.gov/documents/departments/opcd/ongoinginitiatives/seattlescomprehensiveplan/finalgrowthandequityanalysis.pdf>.

¹⁴ <https://data.oaklandca.gov/stories/s/Neighborhood-and-Civic-Life/efqn-hnnk>.

and where traditionally excluded populations currently lack access to opportunity. The analysis should be a standalone analysis, available for public review and comment, but also included in the final environmental review documents.

VIII. Conclusion

CCU respectfully requests that the City address all of the abovementioned comments and incorporate all of the abovementioned changes to the Downtown Community Plan. Should you have any questions or need clarification on any of the above, please do not hesitate to contact us.

Sincerely,



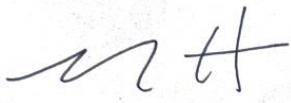
Sissy Trinh
Southeast Asian Community Alliance



Steve Diaz
Los Angeles Community Action Network



Erich Nakano
Little Tokyo Service Center



Greg Bonett
Public Counsel



Brittany Arceneaux <brittany.arceneaux@lacity.org>

DTLA 2040 public comment

3 messages

Charles Porter <charlesp@socialmodel.com>

Wed, Jan 13, 2021 at 4:59 PM

To: "downtownplan@lacity.org" <downtownplan@lacity.org>

Cc: Brittany Arceneaux <brittany.arceneaux@lacity.org>, "Sinai / Louise M." <communityorganizeradvocate@gmail.com>, Tom Grode <manoftheseatom@gmail.com>

January 13, 2021

Downtown Community Plan

Los Angeles Department of City Planning

[200 N. Spring St., Room 667](#)

[Los Angeles, CA 90012](#)

Re: DTLA 2040

To whom it may concern:

We are writing this letter on behalf of the Skid Row Community Improvement Coalition to support the community recommendations submitted by the Skid Row Now & 2040 Coalition. We are the group that envisioned the Skid Row Community ReFresh Spot, a unique, critical community resource that is accessible to those most in need and has provided local employment opportunities. We continue to meet regularly to discuss and advocate for long-neglected community needs.

We offer a counter narrative to the picture portrayed in the "Voices of Central City East" document which was submitted by the Central City East Association (CCEA) as input to DTLA 2040. While (CCEA) claim to advocate for low-income housing and accessible services throughout the City, it is clear that their goal is to eliminate the only place in the city that intentionally protects the poor and most vulnerable.

The same strategy of speaking up for a diverse downtown neighborhood composed of people from mixed incomes and seeking to avoid “marginalization” was used to prevent a Skid Row Neighborhood Council from forming. Unique and tailored approaches and protections from inequitable zoning practices are necessary to give voice and agency to our neighborhood.

The recommendations of CCEA regarding Skid Row should be disregarded. They do not reflect or address our immediate needs. Community plans must be responsive to the needs of the people who live in the neighborhood and responsive to those needs. Skid Row (3rd Street to 7th Street, Main Street to Alameda Street) already has an overabundance of market rate housing and an excessive number of alcohol outlets. What is needed now is sincere consideration of community voices, and immediate action to implement the strategies they propose. That is the spirit of our coalition.

Skid Row is a vibrant neighborhood with a rich culture and a multitude of unique assets. This is evidenced by the success of the ReFresh Spot which is a shining example of what happens when you align community vision with resources. In closing, we urge you to adopt the recommendations of Skid Row Now & 2040 including expanding the Ix1 zone to the traditional Skid Row boundaries as well as protections and support for existing Skid Row Community members.

Sincerely,

Louise Mbella "Sinai" (Frenchy) and Tom Grode on behalf of *the Skid Row Community Improvement Coalition*

Brittany Arceneaux <brittany.arceneaux@lacity.org>

Tue, Jan 19, 2021 at 8:54 AM

To: Charles Porter <charlesp@socialmodel.com>

Cc: "downtownplan@lacity.org" <downtownplan@lacity.org>, "Sinai / Louise M." <communityorganizeradvocate@gmail.com>, Tom Grode <manoftheseatom@gmail.com>

Hi Charles,

Thank you, your comment has been received.

Best,
Brittany

[Quoted text hidden]

--



LOS ANGELES
CITY PLANNING

Brittany Arceneaux

She, Her, Hers
City Planner

Los Angeles City Planning

200 N. Spring St., Room 667
Los Angeles, CA 90012
Planning4LA.org
T: (213) 978-1911



Please note I am out of the office every other Friday.

Brittany Arceneaux <brittany.arceneaux@lacity.org>

Tue, Jan 19, 2021 at 8:55 AM

To: Craig Weber <craig.weber@lacity.org>, Clare Kelley <clare.kelley@lacity.org>, Jordan Hallman <jordan.hallman@lacity.org>, Alice Okumura <alice.okumura@lacity.org>, Valerie Watson <valerie.watson@lacity.org>

[Quoted text hidden]

--



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T: (213) 978-1911



[Quoted text hidden]

Los Angeles City Planning
Attn: Brittany Arceneaux, City Planner
RE: Remarks to the Draft of the Downtown Community Plan Update
07 December 2020

Dear Brittany,

As an architect working within Los Angeles for 8 years, I would like to express my concerns about the current draft of the Downtown Community Plan Update and the Code recommendations for Recode LA 2040. The website states the following:

"Several years ago, City Planning set out to create a modern and efficient zoning system for Los Angeles. The proposed approach aims to establish a new Zoning Code that is more responsive to the needs of Los Angeles's neighborhoods, in addition to being easier to use."

These are noble goals, but the current draft of the code does not show itself to be more responsive to local needs, nor is it easier to use.

The current draft encourages specific distinction between neighborhoods and their current or perceived cultural affiliations. This distinction freezes a location in time and prohibits the future evolution of these areas. This will ultimately result in the perpetuation of a fake architectural representation to gain city approval. The creation of specific development standards in each district will only create confusion and contradiction which will lead to the increased reliance on interpretation from the governing bodies. A greater reliance on interpretation and conversation between differing jurisdictions will slow decisions and make approval times longer. A current example is where balconies and non-flat roof lines are prohibited in the Arts District because it is deemed not reflective of the industrial area. This is nonsensical, and is not reflective of the current building stock in the district. To make something like balconies a discussion topic is a waste of everyone's time. Balconies in residential projects are common design element and meet a market demand, to put restrictions on such a thing will stop development. Furthermore, prescribing roof lines limits function and architectural expression, and should not be dictated by code.

The current drafts for use and density are too specific and all point to increased costs for development to occur. The Hybrid Industrial District in particular has too many development standards that will ultimately put a cap on interest in creating housing in this area because the minimum unit size, material and physical form requirements will be too expensive to implement. As a result, development will occur in other cities with more favorable and realistic conditions. The draft also points to recommended programmatic uses for the interior of the building. No part of a planning code should have jurisdiction in what happens on the interior organization or design of a structure.

All great cities in the world have evolved through changing economic and cultural demands brought on over the course of time. Planned communities have never resulted in diverse and compelling solutions. A form-based code only creates conditions of conformance and sameness, not diversity and vibrance. Implementing code to "protect" a neighborhood that was borne from a lack of those very limitations is at odds with the march of civilization.

We strongly believe that the current draft needs further study and input from the professional design and development community prior to adoption. The draft analysis of the Downtown, Arts District, Little Tokyo, and Chinatown districts in particular need to be reconsidered and not be defined by transitory cultural associations, a form-based code or by prescribed use requirements that will not evolve over time to reflect the community that it serves.

Los Angeles deserves a code that allows for change and evolution and does not preclude certain economic realities needed for growth.

Sincerely,

Chris Carlton, Senior Designer at Shimoda Design Group

cc: Craig Weber craig.weber@lacity.org
Shana Michele Murphy Bonstin shana.bonstin@lacity.com
Will Wright will@aialosangeles.org



Brittany Arceneaux <brittany.arceneaux@lacity.org>

Downtown community plan public comment video

2 messages

Daniel Park <danny@skidrow.coffee>
To: charlesp@socialmodel.com, brittany.arceneaux@lacity.org

Tue, Dec 8, 2020 at 1:52 PM

Download Attachment
Available until Jan 7, 2021

Hi Charles and Brittany, attached is my public comment video recording for today's hearing.

Thank you both,
Danny

[Click to Download](#)

IMG_8788.MOV
0 bytes

Sent from my iPhone

Brittany Arceneaux <brittany.arceneaux@lacity.org>
To: Daniel Park <danny@skidrow.coffee>
Cc: Charles Porter <charlesp@socialmodel.com>

Tue, Dec 8, 2020 at 2:20 PM

Hi Daniel,

Thank you, your comment has been received.

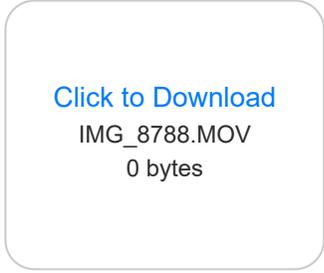
Best,
Brittany

On Tue, Dec 8, 2020 at 1:53 PM Daniel Park <danny@skidrow.coffee> wrote:

Download Attachment
Available until Jan 7, 2021

Hi Charles and Brittany, attached is my public comment video recording for today's hearing.

Thank you both,
Danny



Sent from my iPhone



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Brittany Arceneaux

She, Her, Hers

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Please note I am out of the office every other Friday.



Brittany Arceneaux <brittany.arceneaux@lacity.org>

DTLA 2040 Public Hearing comment

Tom Grode <manoftheseatom@gmail.com>
To: Downtownplan@lacity.org

Wed, Dec 9, 2020 at 3:08 PM

My name is Tom Grode. I'm sending this to you as my personal Public Hearing input as a Skid Row advocate and former resident who lived in Skid Row from 2013 to 2017. My input is also coming to you in group forms. I might submit additional personal input prior to the January deadline. After ten years of advocacy, I was invited to become an honorary Tongva in a sacred ceremony. My Native name is Woorypot Moompet. The purpose of this input email is to highlight the significance of Land Acknowledgments in the context of Land Use Policy.

This is from my comment yesterday at the Public Hearing zoom: "Climate Conversations was part of the DTLA 2040 Open House last year in November. In the November revision, several recommendations under Wellness and Sustainability address Climate Change including three that specifically reference the Urban Heat Island effect. The Skid Row Now and 2040 coalition recognizes that poor communities and communities of color bear the fruit of climate change and so special attention must be made to the vulnerabilities of Skid Row residents both housed and unhoused. Proposed resiliency centers must be open 24/7 in Skid Row. Based on our analysis of the November draft, here is our talking point number four — We want the plan's commitment to "facilitate the integration of locally produced and community oriented public art projects and cultural programming into public spaces to reinforce community character", to include consistent maintenance and additional amenities like hygiene stations, cooling stations, trees, shade structures and seating to occur at the Skid Row parks including San Julian Park and Gladys Park, and we want the creation of new Skid Row parks where possible. We also want this street safety and comfort investment on primary corridors in Skid Row (San Pedro, 3rd, 4th, 5th, 6th, and 7th streets).

I want to highlight that you received a letter regarding trees from Skid Row Resident Katherine McNenny of Industrial District Green December 3rd. Back in September we had terrible heat waves and smoky air due to the fires. Katherine and I exchanged emails where I felt she raised an excellent concern: that LACPC (Los Angeles Service Providers Collaborative) should be doing advanced summer planning given their access to resources and how government representatives come to their monthly meetings.

I reached out to Stephany Campos, Board member of LACPC and Director of the Skid Row Community Refresh Spot, and from that has emerged a planning effort for next summer, *Skid Row Cooling Resources*. Here is a Land Acknowledgment I wrote for this effort:

Skid Row is a unique Urban Heat Island in the midst of Downtown Los Angeles as an Urban Heat Island. As year after year the summer temperatures continue to rise more and more in the day, what man has made captures the heat and releases it during the night.

We Acknowledge the Land beneath what man has made.

We Acknowledge the Tongva, Native indigenous people of Los Angeles, and their ancient village Yaangna, what we call Downtown Los Angeles.

We Acknowledge Biddy Mason as the "patron saint" of Downtown Los Angeles, a former slave who became a Matriarch of early Los Angeles. Biddy Mason was a wealthy landowner and philanthropist to the poor and those in need.

We Acknowledge the Native indigenous people of Los Angeles, their special relationship with Mother Earth, and their hospitality, inviting us into that special relationship.

We Acknowledge the patience, kindness, and compassion of Mother Earth.

In a PowerPoint a few months ago to show the importance of Shade, Katherine referenced a report *The Effects of Historical Housing Policies on Resident Exposure to Intra-Urban Heat* that shows the relationship between the Urban Heat Island effect and Redlining. A couple years ago two DLANC Board members spoke about an Affordable Housing Only Zone being a modern form of Redlining. In the PowerPoint *The Voices of Central City East*, Skid Row Housing Trust CEO Lee Raagas also talks about such a Zone as a form of Redlining.

I'm part of Urban Voices Project, a community choir in Skid Row. For our events, I've written or co-written four or five different Land Acknowledgments. Here is one in the process of being written for an upcoming Holiday Zoom show on December 12. It's the only part of the show also being translated into Spanish.

A Holiday Called Home Land Acknowledgment

At this moment of uplifting the voices of the Skid Row community, with the premiere of this original song, Urban Voices Project is taking a moment to acknowledge the Tongva peoples as the traditional inhabitants and land caretakers of Tovaangar (Los Angeles Basin and Southern Channel Islands). We specifically acknowledge their ancient village Yaangna, what we call Downtown Los Angeles.

In this gathering, we show up, with intention, for the rights and dignity and legacy of the Indigenous Peoples of Los Angeles - also we acknowledge the Mexican heritage of this land - by offering the acknowledgement in English and Spanish.

We introduce the following Land Use Policy Advocacy in Skid Row - that is happening right now - as part of our commitment to do something active toward positive change in our relationship with this people and this land.

Through Urban Renewal in the 1960's, all the housing in Bunker Hill was destroyed to make way for the massive skyscrapers we see today. In response, most of the Skid Row hotel housing was protected and renovated for unhoused folks. City Hall is now updating the Downtown Community Plan. This means updating Land Use Policy and zoning to implement the policy. Acknowledging the Land includes acknowledging Land Use Policy. One third of Skid Row is proposed by City Planning to be an Affordable Housing Only zone. We want that zone for all of Skid Row and so we recently made a public comment video saying Free the Squeeze: expand the Affordable Housing Only Zone in Skid Row.

The land of Skid Row is worth billions of dollars and so we stand in solidarity with Skid Row for a future of Justice and Equity.

My suggestion is DTLA 2040 consider both a Land Acknowledgment in the beginning text of the Community Plan and to encourage ongoing Land Acknowledgments as a Best Practice.



Brittany Arceneaux <brittany.arceneaux@lacity.org>

Public comment video IX1 expansion

2 messages

Zachary Rutland <zacharyrutland@gmail.com>
To: brittany.arceneaux@lacity.org

Mon, Dec 7, 2020 at 6:55 PM

Hello Brittany,

My name is Zachary Rutland. Attached is my public comment video for the hearing tomorrow on the skid row 2040 plan.

Best,
Zach

 **IX1 expansion_ZachRutland.mp4**
8450K

Brittany Arceneaux <brittany.arceneaux@lacity.org>
To: Zachary Rutland <zacharyrutland@gmail.com>

Tue, Dec 8, 2020 at 9:18 AM

Hi Zachary,

Thank you for your comment.

Best,
Brittany

[Quoted text hidden]

--



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Brittany Arceneaux

She, Her, Hers

City Planner

Los Angeles City Planning

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Please note I am out of the office every other Friday.



Brittany Arceneaux <brittany.arceneaux@lacity.org>

Remarks to the Draft of the Downtown Community Plan Update

2 messages

Gabriel Santos <gabriel@shimodadesign.com>

Tue, Dec 8, 2020 at 10:48 AM

To: "brittany.arceneaux@lacity.org" <brittany.arceneaux@lacity.org>

Cc: "craig.weber@lacity.org" <craig.weber@lacity.org>, "shana.bonstin@lacity.org" <shana.bonstin@lacity.org>

Dear Brittany,

As an architectural designer who has been building within the City of Los Angeles for 8 years, I would like to express my concerns about the current draft of the Downtown Community Plan Update and the Code recommendations for Recode LA 2040. The website states the following:

"Several years ago, City Planning set out to create a modern and efficient zoning system for Los Angeles. The proposed approach aims to establish a new Zoning Code that is more responsive to the needs of Los Angeles's neighborhoods, in addition to being easier to use."

These are noble goals, but the current draft of the code does not show itself to be more responsive to local needs, nor is it easier to use.

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We strongly believe that the current draft needs further study and input from the professional design and development community prior to adoption. The draft analysis of the Downtown, Arts District, Little Tokyo, and Chinatown districts in

particular need to be reconsidered and not be defined by transitory cultural associations, a form-based code or by prescribed use requirements that will not evolve over time to reflect the community that it serves.

Los Angeles deserves a code that allows for change and evolution and does not preclude certain economic realities needed for growth.

Sincerely,

Gabriel Santos

SHIMODA DESIGN GROUP, LLP

837 Traction Avenue, Suite 101

Los Angeles, California 90013

213 596 1771

architettura extra superfino



2 attachments

Hybrid Industrial SDG_DTLA 2040_comment compilation.pdf 3603K

2020-12-07 SDG Letter to Planning.pdf 39K

Brittany Arceneaux <brittany.arceneaux@lacity.org>

Tue, Dec 8, 2020 at 12:22 PM

To: Gabriel Santos <gabriel@shimodadesign.com>

Cc: "craig.weber@lacity.org" <craig.weber@lacity.org>, "shana.bonstin@lacity.org" <shana.bonstin@lacity.org>

Hi Gabriel,

Thank you, your comments have been received.

Best,
Brittany

[Quoted text hidden]

--



LOS ANGELES
CITY PLANNING

Brittany Arceneaux

She, Her, Hers
City Planner

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Please note I am out of the office every other Friday.



Brittany Arceneaux <brittany.arceneaux@lacity.org>

Skid Row Affordable Housing Only Zone Advocacy Video Public Comment

2 messages

Mahdi Manji <MManji@innercitylaw.org>

Mon, Dec 7, 2020 at 6:04 PM

To: "brittany.arceneaux@lacity.org" <brittany.arceneaux@lacity.org>

Hi Brittany,

On behalf of Inner City Law Center, the only legal service provider headquartered in Skid Row, I would like to submit the following video as public comment to the City Planning Department in regards to the zoning of Skid Row:

https://drive.google.com/file/d/1FLcm0-GBcr_SNb6MC0F92tQ4Vi201xOy/view?usp=sharing

Thank you very much,

Mahdi Manji

Public Policy Advocate

Inner City Law Center

[624 South Grand Avenue, #2510](#)

[Los Angeles, CA 90017](#)

(213) 443-2369 (direct)

(213) 891-2880 (main)

www.innercitylaw.org

This message is sent by a law firm and may contain information that is privileged or confidential. If you received this transmission in error, please notify the sender by reply email and delete the message and any attachments.

Brittany Arceneaux <brittany.arceneaux@lacity.org>

Tue, Dec 8, 2020 at 9:12 AM

To: Mahdi Manji <MManji@innercitylaw.org>

Hi Mahdi,

Thank you for your comment. It has been received.

Best,
Brittany

[Quoted text hidden]

--

Brittany Arceneaux
She, Her, Hers

12/9/2020

City of Los Angeles Mail - Skid Row Affordable Housing Only Zone Advocacy Video Public Comment



City Planner
Los Angeles City Planning
200 N. Spring St., Room 667
Los Angeles, CA 90012
Planning4LA.org
T: (213) 978-1911



Please note I am out of the office every other Friday.



Jordan Hallman <jordan.hallman@lacity.org>

Fwd: DTLA 2040 Community Plan Update - Comments

1 message

Brittany Arceneaux <brittany.arceneaux@lacity.org>

Tue, Jan 12, 2021 at 3:01 PM

To: Valerie Watson <valerie.watson@lacity.org>, Veena Snehansh <veena.snehansh@lacity.org>, Clare Kelley <clare.kelley@lacity.org>, Jordan Hallman <jordan.hallman@lacity.org>, Alice Okumura <alice.okumura@lacity.org>, Craig Weber <craig.weber@lacity.org>

FYI

----- Forwarded message -----

From: **De Briere, Clare** <Clare.DeBriere@skanska.com>

Date: Mon, Jan 11, 2021 at 8:10 PM

Subject: DTLA 2040 Community Plan Update - Comments

To: brittany.arceneaux@lacity.org <brittany.arceneaux@lacity.org>, craig.weber@lacity.org <craig.weber@lacity.org>

Happy New Year, Brittany and Craig.

First, thank you for taking on the Herculean task of updating the DTLA 2040 Community Plan.

I am the Executive Vice President and Regional Manager for Skanska's Commercial Development office in Los Angeles and have been a real estate developer in Los Angeles for over 30 years. I am also the immediate past Chair of the Urban Land Institute's Los Angeles District Council.

Skanska is a 130+ year-old global real estate development and construction company founded in Sweden with \$18.7 Billion in revenue in 2019. We operate in 11 countries and have three business streams: Commercial Development, Residential Development, and Construction. Its integrated platform, strong balance sheet and ability to draw upon the resources of a global company of 35,000+ employees allow it to pursue and deliver some of the world's most complex projects. Our core company values focus on sustainability, ethics and customer relations.

We opened a regional office of our commercial development company in Los Angeles at the end of 2019; but, our US Building and US Civil divisions have been actively building in Southern California for decades. In Los Angeles, we have purchased three properties thus far, one of which is in the Arts District. We have also located our regional offices for both our Commercial Development and US Building divisions on the 68th floor of the US Bank Building.

As it relates to the DTLA 2040 Community Plan Update, I have offered my specific comments, below. However, I would like to state that these comments are focused on addressing what I see as the City's greatest challenge - to provide housing in a quantity that will ensure that all of our citizens have a safe and affordable home and a healthy and sustainable city in which to live.

Community Benefits Program

- Provide a more substantial FAR bonus for affordable housing in DTLA -- high-rise concrete and steel construction in DTLA is significantly more costly than mid-rise wood frame construction prevalent in the rest of the city, and a higher FAR bonus is needed to support feasibility of mixed-income projects.
- Restore previously proposed base FARs -- the recent reductions in base FAR in Chinatown, Little Tokyo, Historic Core and the Fashion District are substantial and create de facto inclusionary housing in these areas, sharply impacting financial feasibility of projects there.
- Lastly, providing clarity and by right density reduces risk to developers and allows for more affordable development to occur.

Housing

- Pursue Alternative 3 of the Draft Environmental Impact Report -- as the City's walkable transit and jobs center, the plan should maximize capacity for new housing growth.
- Provide more flexibility for housing options in the Arts District and Fashion District, and do not effectively limit housing to live/work units which are more costly and exclusionary.
- Remove the ban on market rate housing around 5th to 7th and San Pedro to Central -- we should create a socioeconomically integrated and healthy

Downtown, not perpetuate failed containment policies. In addition, by allowing for market rate housing in that district, a link between the Arts District and the rest of downtown will be created, providing for a safer pedestrian/biking opportunity to connect all of downtown.

Building Height Limits

- Remove building height limits in Little Tokyo, the Arts District, Historic Core and parts of Chinatown -- these areas are all served by transit and should be places where we aim to maximize opportunities for new housing. Instead of height limits, utilize FAR and urban design tools like setbacks to govern building height and mass, which better aligns with the community benefits program to yield direct benefits and support Downtown's growth, and protect historic districts and buildings through the appropriate established landmarking processes.
- As importantly, by removing height limits, it enables developers to build convertible, above grade parking garages. Overtime these parking spaces can be converted to alternative uses as the need for individual parking spaces wanes. This is a significantly more environmentally and ecologically substantial option than limiting the building height and requiring a developer to build all of its parking below grade.

Industrial Zoning

- Do not include areas zoned exclusively for industrial uses -- these areas should instead provide more flexible zoning to allow them to gradually convert to other uses, including housing, over the long term.

Approval Process

- It is critical that the plan promotes by-right development and decreases the need for projects to be approved on a subjective, one-off basis under discretionary review. We want to ensure that the plan as a whole fosters feasible development, but also provides mechanisms for projects to obtain minor deviations without triggering the need for CEQA review.

Design Requirements

- We are concerned that the code is too specific in the Arts District and Historic Core and inhibits innovative, creative design. It would also go beyond the scope of any zoning code by dictating allowable building materials in the Arts District and virtually precluding the use of wood, the most affordable construction material. DTLA 2040 should promote flexibility, affordability and innovative design.
- This would also limit the use of such highly sustainable material like mass/heavy timber. As the City is moving towards a Net Zero building code, developers need as much flexibility as possible to be able to reach that lofty goal. Further, what could be described as “design” issues could also impact the health of the people who live in those structures.

Limits on Hotel and Ground-Floor Business Sizes

- Hotels should not be limited to 49 rooms and ground-floor commercial establishments should not be limited to 5,000 square feet within Chinatown and Little Tokyo. There is no clear rationale for these limits, and restricting hotels is antithetical to strengthening DTLA's role as a major visitor destination. Business square footage limits would do nothing to ensure tenants are actually small businesses and would limit potential for desirable tenants.

Thank you for your consideration and inclusion of my comments to the DTLA 2040 Community Plan Update.

Clare De Briere

Executive Vice President / Regional Manager

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CITY PLANNING

Brittany Arceneaux

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City Planner

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Please note I am out of the office every other Friday.



Brittany Arceneaux <brittany.arceneaux@lacity.org>

DTLA 2040 public comment submission

2 messages

Diane Valencia <diane@seaca-la.org>
To: brittany.arceneaux@lacity.org

Tue, Jan 12, 2021 at 4:49 PM

Hello my name is Diane Valencia, I am a youth trainer with the Southeast Asian Community Alliance based in Chinatown. I am concerned about the dtla2040 plans not reflecting the deep needs of our community. Why is the city creating a program to provide affordable housing for people making over \$90,000 a year, we need housing for people making less that are extremely low & deeply low income like \$35,000 and less. After my dad lost his business a few years ago, he became an uber driver to survive. But because of the pandemic, he had to stop because it would put him & my asthmatic mom & cancer survivor aunt at risk . With this loss of income it is challenging now more than ever to pay rent . DTLA2040 plans that prioritize income for higher folks is disgusting in the midst of the pandemic. How can you prioritize incentivizing developers & their needs? Think about our vulnerable family & communities struggling to survive especially during the pandemic and the immense aftermath of it! My family is one of many that need support. Our chinatown youth from SEACA have parents laid off from their jobs in the small restaurants, garment factories and hospitality & service industry. Please adopt Central City United plan/ recommendations to the DTLA2040 to better reflect & prioritize our community needs. **Here are some messages from our fellow youth leaders:**

Hi, my name is Jie Yu, I'm 17 years old and a youth organizer at the Southeast Asian Community Alliance (SEACA). As a youth growing up in Chinatown, I've seen the changes of my extremely-low income neighborhood for the past 14 years. Chinatown, the home to a majority senior and immigrant population, faces the aftermath (and increased rent bills) of rapid gentrification. With the population consisting of mostly immigrants from China and Vietnam, we need to preserve this cultural community and its resources that have been so helpful in our assimilation to life in America. Our community is the literal livelihood of our people but rather than the mom and pop businesses that we're so fond of, we're coming home to find that its been displaced by "A New Era In Downtown Living" plastered on the walls of some luxury condo we're not a part of. A majority of our parents hold jobs in this community, but these jobs have become more and more scarce. The very people who have lived here for the longest time and have built chinatown from the beginning are the very ones who suffer the most from these changes. What our people need is a local Asian grocery market, not a new inn or luxury hotel for tourists. What this community needs is a roof over their heads that they can pay for every month, not new luxury buildings that only have a measly amount of affordable housing just to fit the criteria of the city. These things seem like a basic human right, but the sad undeniable truth is that these rights have been neglected. So why is our city catering to these outside developers rather than the very people whose very livelihoods are surrounded by this community? We don't have a laundromat, but we have some boujee, expensive, hipster pins and accessories store. Do our residents really need to have access to hipster pins? We lack so many necessary facilities, like access to affordable dental procedures, a hospital, parking, and even something as basic as a full service grocery market, but still for some reason they think we need to have this over-priced pin shop? Our SEACA office was literally kicked out of the room we rented in *Mandarin* Plaza because we no longer fit the style of every other room around us that has become some variation of a hipster pin shop or something like an "Eternal Life Research" company. Is that fair? Our office, who has been here for so long, displaced because our **Asian** organization in *Mandarin* Plaza, inside **Chinatown**, is ironically a horror to these developers. The inaccessibility this has caused was always evident, but has been amplified during the pandemic. No one has it easy during these difficult times, but could you imagine how bad it has been for our extremely-low-income community. It's unsafe for seniors to leave their houses, but they must get groceries somehow. Hardly anyone is employed, but if we want to keep safe from the pandemic, we gotta keep this roof above our head somehow. But how? With city guidelines that help people making above 90,000 find affordable housing while ignoring our whole community that makes on average 30,000, how can we do it? After my neighbor moved out of our apartment, the owner of the property immediately put up a sign for rent to display right outside my window. On the outside, this seems like a pretty justifiable thing to do, but unbeknownst to

many, he has upped the price almost 60% of what the previous family pays for every month... and in the middle of a pandemic too. This is why, I plead that our county and city officials, the representatives of our small town, make changes to the system that can help the people of our community, rather than ignoring our needs.

Hi, my name is Cindy, and I'm a youth organizer with SEACA. I'm 17 years old from Abraham Lincoln High School. I'm worried that the DTLA 2040 plan doesn't do enough to support local businesses and organizations that serve the local communities. For example, in Chinatown, I have seen many grocery stores that my family used to shop at get closed over the years over rent. And the cultural association my dad is a part of has been worried about rent for quite a while now, despite having occupied the same building for decades. Nowadays I see a lot of trendy places like bars, coffee/boba shops, and art museums. My family no longer goes to Chinatown as much now that we can't get groceries there, although we still depend on Chinatown for other services like the optometrist, orthodontist, tax-preparer, and doctors. I worry that eventually, if even grocery stores cannot survive in Chinatown, there will no longer be a place close by for my family to get essential services. We'd have to drive very far away to find Cantonese-speaking places my family would be comfortable at. I ask that you please consider the CCU's recommendations for the DTLA 2040 plan so that it will better reflect the needs of the community!

Hello, my name is Tracy Nguyen. I'm a Youth Organizer with SEACA and I'm 17 years old from Lincoln High School. I want to address the housing policy in the DTLA 2040 plan. Especially now during the pandemic, it's so difficult and stressful to go to work. I personally witnessed my whole family test positive for COVID-19 and the first concern I see is my dad's shocked face that he can't go to work the next two weeks, NOT the fact that his health and LIFE might be in jeopardy! He was almost tempted to not test despite showing symptoms just so he wouldn't miss work, but thankfully my whole family convinced him otherwise. With utility bills increasing due to this long quarantine, I failed to see his stress paying bills that would usually not be a bother and numerous other concerns that have surfaced. I even heard some of my mom's coworkers find a way to work through the backdoor in their nail salons because they needed money that badly. Their health had become secondary. Witnessing all of this frustrated me. We are low-income families going through so much, risking so much, to make money to survive and yet the affordable housing policy only helps people with incomes above \$90,000? Shouldn't it be the other way around? The poor are at the most risk, and I suggest that at least you can help families whose income is below \$55,000 pay rent instead of above \$90,000. DTLA2040, please give help to the people who actually need it, not higher income people that have plenty of resources. Please adopt the CCU plan in DTLA 2040 to reflect families like mine that are struggling to get by this pandemic.

--

Diane Valencia
Youth Trainer
SouthEast Asian Community Alliance

Brittany Arceneaux <brittany.arceneaux@lacity.org>

Wed, Jan 13, 2021 at 9:22 AM

To: Craig Weber <craig.weber@lacity.org>, Valerie Watson <valerie.watson@lacity.org>, Veena Snehansh <veena.snehansh@lacity.org>, Clare Kelley <clare.kelley@lacity.org>, Jordan Hallman <jordan.hallman@lacity.org>, Alice Okumura <alice.okumura@lacity.org>

FYI

[Quoted text hidden]

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Brittany Arceneaux
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Please note I am out of the office every other Friday.

January 12, 2021

Brittany Arceneaux, City Planner
City of Angeles, Department of City Planning
200 North Spring Street, Room 667
Los Angeles, California 90012

Dear Brittany,

I have read the DTLA40 plan (online) that was revised in November 2020. The major focus of this document is proper land use to control growth that will support a sustainable downtown Los Angeles.

However, this planning document is not complete until it first considers the people who live downtown—including their welfare and quality of life. People are central for a community to exist, and ideally the physical configurations of this community would accommodate their needs and aspirations.

1. As a starting point, I recommend that DTLA40 provide current demographic information that includes ethnicity, economic status, education levels, and types of jobs of downtown residents. Also, the homeless population needs to be included. The city planning department has access to the most current demographic information that are fundamental to designing and modifying the community's physical environment to meet the needs of its residents.

2. DTLA40 needs to address the issues of social and racial inequity in a city that has a long history of promoting and supporting racism. The death of George Floyd in May 2020 and the current Covid 19 have demonstrated that this deep wound still persist not only in our nation, but also in the city of Los Angeles. Thus, planning of the physical environment of downtown needs to take this into account. The ethnic residents are particularly interested in affordable housing, economic centers, and educational/recreational facilities.

3. I have witnessed the city's social and racial inequity with my historic preservation work in the neighborhoods of Chinatown and Little Tokyo. In too many instances, developers have engaged in practices that have compromised the identity and existence of these ethnic cultures by displacement of its residents and also destruction of their treasured buildings and open spaces. To address this issue, I am presenting the following recommendations:

First, DTLA40's policy section needs to contain statements about the protection and preservation of Downtown's rich ethnic communities, cultures and history.

Second, this document should include the mapping of ethnic sites that are both certified and undocumented based on the LA Survey studies. This will provide the opportunity for developers in their activities to understand and protect Downtown's complex cultural and historic resources.

Third, DTLA40 needs to present a recommendation and strategy for certifying the large number of potential historic sites in our ethnic neighborhoods. Historic sites on the National Register and Los Angeles City's local Historic Monument program are now predominantly white or anglo. However, this group represents only 28% of Los Angeles City's population. (Nationally, only 9% of National Register sites represent ethnic groups.)

Finally, DTLA40 need to contain a description and support of the Legacy Business Program (in progress at the Los Angeles City Council). This program will protect the living culture, history, and economic backbone of the downtown ethnic neighborhoods.

In conclusion, Eugene Moy's concept of the "Chinatown Village" (supported by the LA Conservancy) summarizes a comprehensive approach to the preservation of a community—this includes protection of its history, culture, buildings, and open spaces.

4. This version of DTLA40 has eliminated the detailed description of this community's historic and cultural resources that was in a previous version. Downtown has the largest concentration of these invaluable resources in the city of Los Angeles—this is where its history started. Therefore, I recommend that this description be included because of its important value to developers and the public in understanding the complex history of Los Angeles and downtown.

5. It is accepted fact that ethnic neighborhoods are impacted disproportionately by climate change and natural disasters. Thus, I am recommended the following topics for DTLA40.

The climate change section that you sent me on December 2020 is an excellent over-view. My suggestion is that this section can list partners who are working in this evolving area, such as researchers at the local universities and also agencies within LA City and LA County.

The intent is to demonstrate to the Downtown community that the LA City leadership is using the latest research and technologies to combat the climate change conditions that have the potential to change dramatically the way we work and live.

6. Proper disaster planning is essential for the survival of any human community. In the city of Los Angeles, this is particularly relevant with its numerous earthquake faults. DTLA40 particularly needs to include this topic in its planning, particularly as the path of the Puente Fault runs under the Central Library from Dodger Stadium. In addition, FEMA has recently rated Los Angeles County as the most dangerous in the nation for natural disasters (Washington Post—January 2, 2021).

I thank you for your consideration of the above recommendations, and I appreciate your continual efforts in this important project.

Dorothy Fue Wong
601 North Grand Avenue
Apt 460
Los Angeles, California 90012
dorothyfuewong@me.com

Sent from my iPad



December 11, 2020

Ms. Brittany Arceneaux
Department of City Planning
City of Los Angeles
200 North Spring Street, Room 667
Los Angeles, CA 90012

Dear Ms. Arceneaux,

Thank you for the opportunity to comment on the forthcoming update to the Downtown Community Plan. We are writing on behalf of **Abundant Housing LA**, a pro-housing education and advocacy organization working to help solve Southern California's housing crisis. We support efforts to reform land use regulations and zoning codes, and expand housing production at all levels of income.

As you know, the City of Los Angeles is suffering from a severe housing crisis. Exclusionary zoning and longstanding constraints on denser housing production, combined with a lack of sufficient funding for affordable housing production and preservation, have led to a massive shortage of medium and high density housing, especially near jobs and transit. Since 2013, Los Angeles' housing supply has [grown by just 4%](#).

This has made Los Angeles one of the nation's most unaffordable housing markets; [according to the Los Angeles Times](#), the average rent rose 65% since 2010, to over \$2,500. High rents and a lack of new housing opportunities have caused greater financial pressure on families, longer commutes, increasing carbon emissions, more displacement of historically disadvantaged communities, high homelessness, and reduced access to economic and educational opportunity. This has also reinforced longstanding patterns of income and racial segregation in our city's neighborhoods.

Fixing these problems requires us to encourage the construction of hundreds of thousands of new homes, both market-rate and deed-restricted affordable, throughout our city. Fortunately, the Regional Housing Needs Assessment (RHNA) affords Los Angeles the opportunity to finally address its housing crisis in a transformational way. In the upcoming Housing Element Planning Cycle, Los Angeles must accommodate **456,000 new homes** by the end of the decade, **40%** of which must be affordable to households with very low or low incomes.

To achieve this goal, the City will need to update its housing element and community plans in order to accommodate this historic amount of housing production. In particular, denser housing production is needed in neighborhoods with excellent access to transit and jobs, like Downtown Los Angeles. This will reduce rents, improve access to jobs and transit, strengthen the local

economy, protect the environment and reduce car dependency, reduce displacement, and promote racial and socioeconomic equity.

Additionally, it is imperative that City policy promote development without displacement. [Gentrification and displacement of lower-income communities are a painful consequence of systemic racism and of our region's exclusionary zoning and subsequent lack of new housing.](#) When high-income neighborhoods refuse to allow housing, renters in all neighborhoods are harmed, and lower-income renters are harmed the most. Displacement is felt acutely in Communities of Color, given that they frequently face [heavier housing cost burdens](#) than white Angelenos, and typically comprise the majority of the population in gentrifying neighborhoods.

This is the case in Chinatown, where the [availability of affordable homes has declined](#) in recent years due to the expiration of affordability covenants, creating undue financial pressure on Chinatown's renter community. We recognize the valuable work of Chinatown community leaders and tenants' rights advocates in drawing attention to this important issue and advocating for solutions that promote the preservation of affordable housing.

[Abundant Housing LA's policy agenda](#) endorses stronger tenant protection policies, such as expanded affordable unit replacement requirements ("no net loss") for redevelopment of existing rental properties, a "right of return" after redevelopment at the same rent as before, rental assistance during redevelopment, and a voluntary, negotiated tenant buyout system. Applying these policies citywide would help ensure that lower-income renter households can remain in their communities at an affordable rent, as new housing opportunities are created.

With all this in mind, we applaud Planning's efforts in updating the Downtown Community Plan. The proposed update would encourage significant housing growth in our city's most job- and transit-rich neighborhood by allowing residential uses in 60% of Downtown's land (up from only 33% today) and broadly increasing maximum FAR and building heights. These policies would create space for an estimated 100,000 new homes and 86,000 new jobs by 2040.

Furthermore, the proposed community benefits program would directly incentivize construction of on-site affordable homes through a density bonus program. Additionally, by allowing by-right approval of projects with up to 500 housing units (for projects that use the community benefits program), the City will streamline the production of much-needed housing and reduce opportunities for nuisance lawsuits and political interference. Finally, the elimination of mandatory on-site parking requirements for new construction is [a necessary, farsighted step](#) towards reducing our city's car dependence and carbon footprint.

Abundant Housing LA has identified opportunities for additional improvements to the Downtown Community Plan. We believe that more can be done to encourage additional housing growth, both market-rate and deed-restricted affordable, further reduce car dependence, and generate funds for affordable housing and improvements to transit and pedestrian infrastructure.

Recommendation #1: Restore the proposed base FAR from the summer 2020 version of the Plan, eliminate proposed maximum building heights, and implement the maximum bonus FAR proposed in the Draft Environmental Impact Report's Alternative 3.

We support the Plan's efforts to encourage denser housing production by increasing the maximum base FAR, and by instituting a density bonus program that offers a higher maximum bonus FAR in return for meeting an affordable housing set-aside requirement. However, we are concerned that the most recent version of the Plan [reduces the maximum base FAR in northeast and southeast Downtown, and reduces the maximum bonus FAR in southeast Downtown](#) from 4.5:1 to 3:1.

While we recognize that this change is intended to encourage usage of the density bonus program, we would point out that the change greatly reduces the attractiveness of the Level 1 density bonus tier (a 35% density bonus on a 6:1 base FAR provides an extra 2.1 FAR, but only provides an extra 0.7 FAR when the base FAR is 2:1). This change would make usage of the density bonus program less economically feasible, resulting in less production of deed-restricted affordable homes in neighborhoods like Chinatown and the Arts District, where affordable housing growth is desperately needed. We urge you to restore the original maximum base and bonus FAR proposed in the summer 2020 version of the Plan.

We are also surprised that the Plan proposes new maximum building heights in some portions of Chinatown, Little Tokyo, the Historic Core, the Fashion District, and the Arts District. These limitations are likely to make it physically impossible or economically infeasible to build to the maximum base and bonus FARs proposed in the Plan, which would again discourage housing production and usage of the community benefits program in these areas, many of which are within walking distance of Metro stations. We recommend eliminating these maximum building heights; the Plan should instead regulate maximum building sizes through the FAR limits.

Finally, we support increasing the maximum bonus FAR in the community benefits program. We recommend adopting the Draft Environmental Impact Report's Alternative 3, which would raise the maximum bonus FAR to 10:1 in areas where the maximum bonus FAR is currently proposed as 3:1, 4.5:1, 6:1, and 8.5:1, and would raise the maximum bonus FAR to 13:1 in areas where the maximum bonus FAR is currently proposed as 8:1 and 10:1. Larger maximum FARs would make the density bonus program even more attractive by improving the economic feasibility of new housing projects. Also, since the affordable unit set-aside is now calculated as a percentage of the **total** building units (rather than the base units), this would directly increase the number of affordable units in projects that use the community benefits program.

Recommendation #2: Modify the requirement that residential buildings in Subarea A.3 that use the density bonus program must make at least 30% of the building's units two bedrooms or larger. Encourage production of affordable family units by introducing a "super-density bonus" tier throughout Downtown, for projects that make at least 30% of the building's two bedrooms or larger.

Under the current Plan, a residential project in Subarea A.3 (which roughly equates to the Chinatown neighborhood) would only be able to use the density bonus program if at least 30% of the building's units are two bedrooms or larger. The intent of this policy is very positive: it is designed to encourage the production of family housing, which responds to the severe need for housing opportunities that are affordable to families in Chinatown, especially households with lower incomes. City policy **should** encourage new affordable family housing in Chinatown.

However, we are concerned that designing this policy as a one-size-fits-all mandate is likely to backfire and discourage affordable housing production in Subarea A.3 altogether. It would impose a substantial new cost on housing production, causing fewer residential projects to be economically feasible. This is especially true for buildings that would primarily offer micro-units or studios, which have lower rental costs relative to larger units. Builders would likely respond to this requirement by declining to use the density bonus program at all, which would deter the production of both deed-restricted affordable and market-rate housing units in Subarea A.3.

We strongly support more housing in Downtown, and we want more of the new homes built in Downtown to be affordable to families with low incomes. To achieve this outcome, we propose introducing an optional "super-density" bonus FAR tier for projects that make at least 30% of the building's units two bedrooms or larger. This FAR bonus could be designed as a "Level 3" above and beyond the current maximum bonus FAR in the proposed community benefit program. Since the affordable unit set-aside is now calculated as a percentage of the **total** building units (rather than the base units) this policy would directly increase the number of affordable units in a project that chooses to use the "super-density" bonus tier. We also recommend applying this "super-density bonus" tier throughout Downtown, not just in Subarea A.3.

Recommendation #3: Introduce a parking maximum on new construction, and introduce a per-space fee on all existing and new parking lots and garages in Downtown.

Again, we strongly support the Plan's proposed elimination of mandatory on-site parking requirements throughout Downtown, and we applaud your team for taking a bold step towards transforming Downtown into a transit- and pedestrian-first neighborhood. Eliminating this restriction will create more space for housing units within future residential projects, and reduce the cost of housing construction (resulting in lower rents and home purchase prices).

Nevertheless, bolder actions are needed in order to achieve this transformation more quickly. Like most of Los Angeles, Downtown has a massive oversupply of parking spaces; [researchers estimate that it has over 400,000 parking spaces](#). If every Downtown resident and worker parked at once, there would still be more than 100,000 open spaces. These spaces can accommodate future Downtown population and job growth, especially as greater adoption of mass transit and autonomous vehicles/mobility-as-a-service make car ownership less common. Furthermore, even in the absence of an on-site parking requirement, risk-averse bank lenders

and investors are still likely to insist that new projects maintain a high level of on-site parking, limiting the impact of the City's elimination of the on-site parking minimum requirement.

For these reasons, we recommend introducing a parking **maximum** on new construction throughout Downtown. In the case of residential development, this policy should cap on-site parking to a maximum of one parking space per new housing unit. The City should also introduce a per-space fee on all existing and new parking lots and garages in Downtown, which would create a revenue stream to fund affordable housing, streetscape improvements, better pedestrian safety infrastructure, higher-quality mass transit, and a program to facilitate better parking management (which will increase the accessibility of existing surplus parking spaces). This policy would also encourage the redevelopment of existing lots and parking structures into new homes and businesses, further establishing Downtown as a hub of economic activity and vibrancy.

Parking maximums have been successfully implemented throughout [London](#) and [Mexico City](#), and in parts of [San Francisco](#) and [Oakland](#). Mexico City's policy requires developers to pay a fee if they build more than 50% of the maximum parking allowed. Revenues from the parking fee are used to improve transit and subsidize housing.

Los Angeles needs to prioritize homes for people over homes for cars, particularly in neighborhoods like Downtown that are well-served by a growing network of rail, bus, and protected bike lanes. A Downtown parking maximum would help to achieve this policy objective, and accelerate our city's evolution away from car dependence.

Recommendation #4. Amend the Industrial-Mixed Use 2 (IX2) and Hybrid Industrial 2 (HI2) zones to allow all residential housing types. Do not restrict housing options in these areas to live-work units only.

Under the proposed Plan, the Industrial-Mixed Use 2 (IX2) and Hybrid Industrial 2 (HI2) zones would limit new residential units in the Fashion District and Arts District to live-work units only. We are concerned that this requirement would effectively mandate the production of high-cost housing units as the sole option for new housing in these neighborhoods.

This is because live-work units are generally built to specifications above and beyond standard rental housing, including features like high ceilings and a large minimum unit size (at least 750 square feet in the Fashion District; at least 1,000 square feet in the Arts District). Since homes with these specifications are more expensive to build than most housing units, this requirement would essentially make it infeasible to build affordable housing, middle-income housing, or studio and one-bedroom units in the IX2 and HI2 zones, and would discourage use of the density bonus program in these areas.

While we recognize that the Plan was recently amended to loosen these restrictions somewhat, residential projects would still need to include a minimum 1 FAR of commercial or light industrial

space, unless the residential units are live-work. This requirement could still render potential residential projects economically infeasible, especially given the uncertain pace at which demand for commercial space will recover post-pandemic. There's no clear rationale for the City to mandate the inclusion of commercial or live-work space within residential projects in the Fashion District and Arts District, and we recommend eliminating this requirement altogether.

A Downtown Community Plan update that incorporates the above recommendations will help advance our common goals of housing affordability, socioeconomic equity, economic prosperity, and environmental sustainability. We look forward to further engagement with the Department of City Planning on this critical effort, and are happy to meet with you at any time to discuss these policy proposals.

Thank you for your consideration, and for your hard work on this important project.

Sincerely,

Leonora Camner
Executive Director
Abundant Housing LA

Anthony Dedousis
Director of Policy and Research
Abundant Housing LA

DTLA 2040 COMMUNITY PLAN -- LITTLE TOKYO POLICIES YK 12/6/20

PROPOSED TEXT By City Planning with YK modifications underlined:

LU GOAL 42 VILLAGES - NEIGHBORHOOD POLICIES

Little Tokyo

Little Tokyo is a historic-cultural neighborhood and symbolic center for the Japanese-American community. The neighborhood contains a variety of religious and cultural institutions and a mix of residential, commercial and institutional uses. Small retail shops, restaurants and store fronts contribute to the pedestrian-oriented nature of the area.

LU 42.6 Monitor and strengthen the pedestrian elements in Little Tokyo by preserving existing street frontages and internal pathways, enabling commercial uses on the ground plane of all buildings, and supporting the orientation of mid-block paseos.

LU 42.7 Retain, support and reinforce the historic and cultural elements of Little Tokyo, including the businesses and cultural and religious institutions within the community.

LU 42.8 Complete, support and reinforce the Little Tokyo midblock Pedestrian Spine system to enhance connectivity in Little Tokyo. (including the Onizuka Mall and a westerly extension to the city building pedestrianway.)

LU 42.9 Support the advancement and expansion of performance and creative arts, including and in addition to the Union Center for the Arts (East/West Players), Japanese American Community & Cultural Center (Aratani Theater), and Japanese American National Museum (Takeuchi Democracy Forum).

LU 42. Provide measures to mitigate gentrification caused high property values and expensive rents created by the regional connector station, that are threatening small businesses and the statinability of Little Tokyo as a viable cultural and ethic community.

LU 42. Discourage acquisition and demolition of properties with existing small businesses to construct high density developments.

(B) Add new Policies and Programs to prioritize small businesses, affordable housing, displacement avoidance, inclusive economic development, mobility and support cultural and religious institutions in Village Communities.

Please respond regarding all my above suggestions for possible inclusion in the DTLA 2040 Community Plan.

Yukio Kawaratani yklk31@gmail.com

December 3, 2020

Craig Weber
Principal City Planner & Division Head
City of Los Angeles

Re: Draft DTLA 2040 Plan Feedback
454 S. San Pedro Street / 501, 511 E. 5th Street

Dear Mr. Weber,

The purpose of this letter is to provide feedback on a specific parcel for which the zoning and land use will be updated as part of the comprehensive DTLA 2040 Plan. We are writing on behalf of the Downtown Women's Center ("DWC"), a longstanding organization in the DTLA community which provides support and housing for women experiencing homelessness, GTM Holdings, an affordable housing developer and builder with more than 30 years of experience working in the City of Los Angeles, and Daylight Community Development, a recipient of the Mayor's HHH Innovation Challenge and one of DWC's partners. DWC and other community partners have provided feedback on the proposed plans for our neighborhood on several occasions but, in this context, we are requesting a re-examination of a specific property that is particularly impactful to DWC's organizational goals and the vision for the immediate area.

The Downtown Women's Center, which is generally located at 434-442 S. San Pedro Street, has leased the parking lot adjacent to our headquarters at 454 S. San Pedro Street from the Los Angeles Housing and Community Investment Department (HCIDLA). The parking lot includes addresses 454 S. San Pedro Street and 501,511 E. 5th Street and is designated with Assessor's Parcel Number 5147-007-901 (the "Property"). Due to its adjacency to DWC's existing headquarters and its historic use by our organization, the Property has been earmarked for housing development by the HCIDLA Land Development unit. The Downtown Women's Center, in partnership with our development partners Daylight Community Development and GTM Holdings, is the anticipated developer of this project, and an Exclusive Negotiating Agreement between the developers and HCIDLA was approved by City Council on November 10, 2020 and signed by HCIDLA on November 19, 2020. Our vision is to redevelop the lot into 98 units of permanent supportive housing, supportive space, and other community-serving uses, in service of our mission to end homelessness for women in Greater Los Angeles.

The Property is currently zoned M2-2D. The Draft DTLA 2040 Plan currently assigns two separate land use designations and "split-zones" the Property into Markets ([MUB2-SH1-5][IX1-FA]-[CPIO]) and Community Center ([MUB2-SH1-5][XC1-FA][CPIO]), respectively (See "Exhibit A"). We request that the Planning Department revisit the dual designation for the Property as well as the surrounding properties to the southeast along 5th Street. Split-zoning, especially through a unprecedented effort in the City to implement form-based code, is not consistent with the goals of the community plan update process nor good zoning practice and is likely to create complexity and confusion for any future developer of these properties.

Instead, we propose that the DTLA 2040 plan designate the Property solely as Community Center land use designation with the zoning string as currently proposed: [MUB2-SH1-5][XC1-FA][CPIO]. This

designation and zoning combination is more flexible and appropriate for the site, given the adjoining DWC headquarters and recent housing development to the west and north. The Community Center land use and corresponding zoning will allow for a more creative arrangement of uses, including community-serving amenities like street-facing retail. The current anticipated plan for the Property will still support the DTLA 2040 Plan's goals of further development affordable and supportive housing and by limiting the encroachment of market rate developments near Skid Row.

We look forward to continuing to work with you to improve the DTLA 2040 strategy for this Property and the greater DTLA 2040 Plan area. Our team would like to set up a brief meeting to better understand how the final land use and zoning update may impact a proposed project at this site. We can be available at your convenience over the next few weeks.

Sincerely,



Amy Turk
CEO
Downtown Women's Center

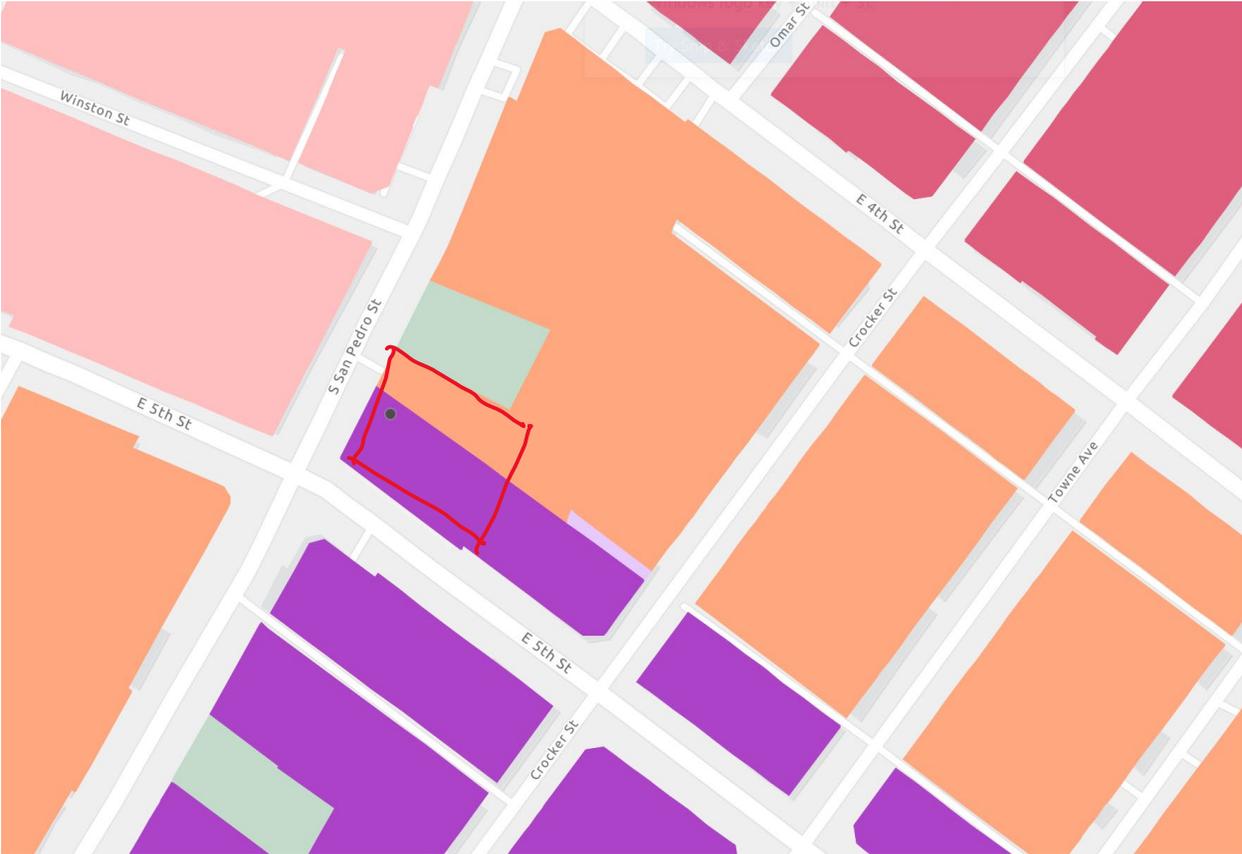


Sonya Falcone, Greg Comanor & Aaron Sassounian
Partners
Daylight Community Development



Mark Walther
President
GTM Holdings, LLC

Exhibit A





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January 12, 2021

BY EMAIL

Craig Weber
City of Los Angeles, Department of City Planning
200 N. Figueroa Street
Los Angeles, CA 90012

**Re: Downtown Los Angeles Community Plan
Update (DTLA 2040) Comment Letter**

On behalf of our client, Embassy Group Associates, we respectfully submit this comment letter regarding the proposed Downtown Los Angeles Community Plan Update (“**DTLA2040**”) published by the City of Los Angeles (the “**City**”) Department of City Planning (the “**Planning Department**”) in November 2020.

As long-time stakeholders in the Community Plan area, we appreciate the concerted effort and amount of outreach that has been made in our community especially in light of the current logistical challenges. Upon review of DTLA2040, we also applaud the City’s effort in providing a new framework and guidance for smarter development practices that will accommodate our community’s and region’s growing needs. Therefore, we submit for your consideration our recommendation to build on the good work that has been done to date with the aim of exercising the best planning practices to grow better neighborhoods.

We believe that with the incorporation of our recommendation, DTLA2040 would be more effective in achieving DTLA2040’s Guiding Principles, and local and regional housing and greenhouse reduction goals, while providing a more cohesive transition across neighborhoods by adjusting proposed land use designation and zoning boundaries to more appropriately follow existing neighborhood form, architectural character, and potential development patterns, as outlined further below. The primary result of our recommendation would be to increase the maximum **Bonus Floor Area Ratio (“FAR”)** from 10:1 to 13:1 (no change to the base FAR).

The subject parcels are composed of four city blocks bounded by Main Street to the west, Santee Street to the east, 11th Street to the north, and Pico Boulevard to the south (collectively, the “**Property**,” identified on the map below).

Craig Weber
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The Property is located in a unique position, at the convergence of varying block configurations and development patterns. It is currently developed with low- to mid-rise commercial retail and office buildings, a church, and several surface parking lots. Surrounding blocks are generally developed with low-rise buildings to the south, and more mid- rise and denser developments to the east, west and north. DTLA2040 proposes the Transit Core land use designation and corresponding [HB1-G1-5] [CX2-FA] [CPIO] zone, which as currently proposed, extends south across the Pico Boulevard corridor. Our recommendation is to designate the Property with the Traditional Core land use designation and corresponding [HM1-CHC1-5] [CX2-FA] [CPIO] zone that would be more appropriately shared with the blocks north across 11th Street. In effect, our recommendation would only change the Form District and Frontage, while the Development Standards, Use, and Density would remain the same. An added benefit would also be an increase to the maximum Bonus FAR from 10:1 to 13:1 after meeting strict criteria in exchange for increased commercial or much needed housing. See below proposed and recommended land use and zoning maps.

Craig Weber
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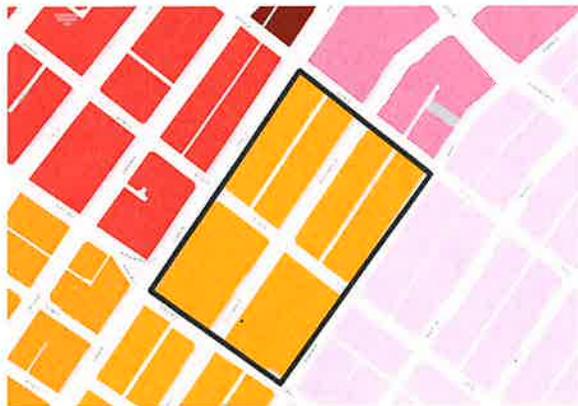
Current DTLA2040 Land Use Designation
(Transit Core)



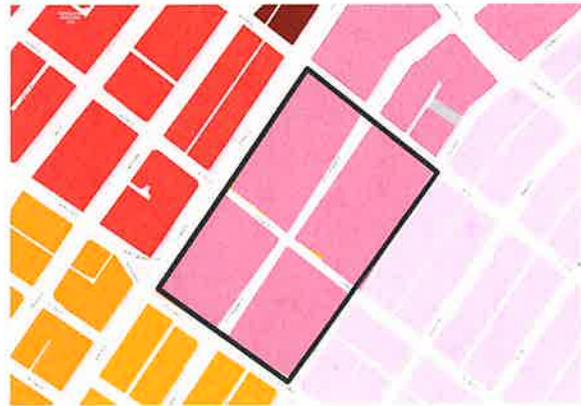
Recommended Land Use Designation
(Traditional Core)



Current DTLA2040 Zoning
[HB1-G1-5] [CX2-FA] [CPIO]



Recommended Zoning
[HM1-CHC1-5] [CX2-FA] [CPIO]



The current DTLA2040 Transit Core designation and our recommended Traditional Core designation for the Property are both intended to create an active, pedestrian-oriented neighborhood with a diverse mix of residential, commercial, office, and neighborhood-serving uses within mid-rise to high-rise buildings. Where they differ is that the Traditional Core designation recognizes the “time-honored urban development pattern and a collection of historically-significant buildings” in this Downtown neighborhood and provides zoning mechanisms to help preserve and promote the neighborhood character. (DTLA2040, pg. 13) As further discussed below, these mechanisms should also be extended to apply to the Property.

From a zoning perspective, our recommendation to change from the currently proposed [HB1-G1-5] [CX2-FA] [CPIO] zone to [HM1-CHC1-5] [CX2-FA] [CPIO] would only change the Form District and Frontage, while the Development Standards, Use, and Density would remain the same. The current proposed Form District HB1 would allow a base FAR of 3:1 and a Bonus FAR of 10:1

Craig Weber
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by utilizing the DTLA2040 Community Benefits Program. Form District HB1 would not impose a maximum height limit. The recommended Form District HM1 would allow the same base FAR of 3:1 and no height limit, but would allow a Bonus FAR of 13:1. The current G1 (General) Frontage provides “General” standards to create “a high-quality pedestrian environment” through certain lot and frontage standards. (DTLA2040, Div. 3B.3). The proposed CHC1 (Historic Core) Frontage would similarly activate the ground floor, but also provide additional story and facade standards to ensure new development contributes to the established architectural character of Downtown’s Historic Core. (DTLA2040, Div. 3B.9.1) Use District CX2, which would remain unchanged, and allow a mixture of commercial, residential, and office uses. The FA Density, which would also remain unchanged, and not limit residential density (only limited by FAR).

For the following reasons, the current proposed Transit Core land use designation and [HB1-G1-5] [CX2-FA] [CPIO] zone for the Property are inconsistent with the existing and potential future development pattern in the surrounding neighborhood; and instead, we believe the Traditional Core designation and [HM1-CHC1-5] [CX2-FA] [CPIO] zone to be more consistent:

1. The existing development pattern of the Property is more consistent with the adjacent blocks to its north in many respects.

For example, the Property’s block size and configurations are more comparable to those north of 11th Street as they are larger and do not have the notable north-south alleys as indicative of those blocks south of Pico Boulevard and east of Santee Street. The notable difference in block configurations reinforce Pico Boulevard, as a clear demarcation of two distinct neighborhoods that deserve varying degrees of potential massing and development envelopes.

2. The above distinction between the neighborhoods also applies to the existing style and massing of the buildings that are shared between those within the Property and those to the north of the Property across 11th Street that have low- to mid-rise commercial retail and office buildings, as opposed to properties to the south across Pico Boulevard, which are predominately low-rise retail buildings.

As indicated above, these larger city blocks within the Property are able to accommodate larger buildings as exists today than those blocks south of Pico Boulevard and would be more suitable to accommodate the increased Bonus FAR of 13:1 FAR. Aligning the Property’s proposed zoning with the surrounding neighborhood context and potential development pattern would be consistent with good planning and zoning practices and allow for a better built environment that more accurately responds to the current and future development patterns and needs of the community.

3. The current DTLA2040 zoning map appropriately identifies parcels to the north of the Property, which have similar existing physical and community characteristics as the Property, with the Traditional Core land use designation and corresponding HM1 Form District that allows a 13:1 Bonus FAR. Extending the Traditional Core land use designation to include the Property would allow for a harmonious development pattern and allow the

Craig Weber
January 12, 2021
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creation of more diverse uses and intensities through the DTLA2040 Community Benefits Program to meet the City's anticipated growth and housing needs.

The suggested Form District HM1, which would be more responsive to the neighborhood context, as described above, would allow a Bonus FAR of 13:1 by utilizing the DTLA2040 Community Benefits Program, and would allow future development of the Property to include a variety of different commercial, residential, and/or office uses at more efficient and sustainable building intensities. The more appropriate 13:1 Bonus FAR, which would better utilize the Property and serve the surrounding community, would also be consistent with DTLA 2040 Guiding Principle of accommodating anticipated growth in an inclusive, equitable, sustainable, and healthy manner to support and sustain Downtown's ongoing revitalization.

While the COVID-19 pandemic has impacted every community, the Downtown community has been most impacted with a significant jobs loss and economic slowdown in part due to a severe reduction in visitors and shifts to remote work.¹ Coupled with the City's 6th Cycle SCAG RHNA obligations to create more than 455,000 units between 2021 to 2029, of which 20 percent is anticipated in Downtown, increasing the Bonus FAR from 10:1 to 13:1 would allow for future flexibility and be more sensitive to the economic realities and the City's dire affordable housing needs. Moreover, a switch from Form District HB1 to Form District HM1 would not change the Property's base 3:1 FAR, which would ensure that any increased development beyond 3:1 FAR would provide much-needed affordable housing, open space, and other public benefits through the DTLA2040 Community Benefits Program.

4. The Property includes several historic and historically eligible buildings, as identified on Historic Places LA, which makes the Traditional Core designation and corresponding CHC1 Frontage more applicable to the Property rather than the proposed Transit Core designation and G1 Frontage, since DTLA2040 provides specific development standards for the "Traditional Core areas [which] have a time-honored urban development pattern and a collection of historically significant buildings." (DTLA2040, pg. 13)

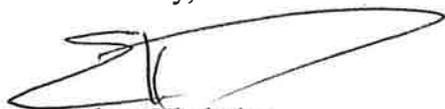
The Traditional Core land use designation and corresponding CHC1 Frontage District is more appropriate for the Property because it reinforces the prevailing architectural characteristics of the historic buildings on the Property, with an architectural style established in the late 19th and early 20th centuries. As explained above, the existing style and massing of the buildings within the Property are shared with those to the north of the Property across 11th Street, which also have the CHC1 Frontage District. The CHC1 Frontage would ensure new development at the Property would contribute to the established architectural character of Downtown. The image, below, from the Historic Places LA interactive web map shows that there are four buildings eligible for National Register and California Register as an individual historic property within the Property, including the F.W. Braun Building, Raphael Glass Company, the International Ladies Garment Workers

¹ Second Quarter 2020 Downtown LA Market Report, Downtown Center Business Improvement District: <https://ctycms.com/ca-dtla/docs/dtla-market-report-q2-2020.pdf>

Craig Weber
January 12, 2021
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For the above-referenced reasons, we respectfully request that the City consider the proposed changes to DTLA2040. Thank you, and please let me know if you would like to discuss.

Sincerely,

A handwritten signature in black ink, appearing to read 'Edgar Khalatian', written over a horizontal line.

Edgar Khalatian
Partner



January 12, 2020

Brittany Arceneaux, City Planner
Department of City Planning
City of Los Angeles
200 North Spring Street, Room 667
Los Angeles, CA 90012

Sent via e-mail due to COVID-19 pandemic:

Brittany.arceneaux@lacity.org
downtownplan@lacity.org

RE: FASTLinkDTLA Comments on DTLA 2040 Plan

Dear Ms. Arceneaux,

On behalf of FASTLinkDTLA and our board members and supporters, we are writing to add our comments to the current draft of the DTLA 2040 Plan in hopes of strengthening this document for Los Angeles' future health, affordability, and economic and mobility recovery after the COVID-19 pandemic.

The DTLA 2040 Plan is a crucial visionary document for Downtown Los Angeles. We support the Planning Department's goal of making Downtown Los Angeles (DTLA) a compact, active, multi-income, fully accessible community that is also an international visitor destination. We applaud the elimination of parking minimums to encourage more transit use, so that more people may live, work, shop, recreate, learn and enjoy the cultural, sports and entertainment in DTLA.

In order to deliver this laudable vision, we urge the Planning Department to eliminate height restrictions and use restrictions, especially adjacent to current and future transit. We also urge that the Planning Department include all of the proposed and entitled mobility projects in the DTLA 2040 Plan in order to receive the maximum amount of federal, state, local and private funding for crucial zero-emission transportation projects, such as the fully entitled EV LA Streetcar, Metro's Regional Connector and West Santa Ana Branch rail projects, the proposed new 6th Street Station in the Arts District, the proposed aerial tram, and expanded LADOT and Metro's EV bus network. We also ask that commensurate transit-oriented related zoning are enhanced along these routes and adjacent to these projects to make more jobs, housing, retail, entertainment venues and parks are accessible in DTLA without requiring a car.

FASTLinkDTLA

DTLA Headquarters: 525 South Hewitt Street, Los Angeles, CA 90013

5120 Highland View Avenue, Eagle Rock, CA 90041

hilary@FASTLinkDTLA.org

Specific recommendations for the DTLA 2040 Plan

We write today to provide comments on the DEIR for the DTLA 2040 Plan, expressing our concerns that certain elements included in the current version of the DTLA 2040 Plan will severely impact the City of Los Angeles' and Downtown Los Angeles (DTLA)'s ability to:

1. Recover from the severe economic and development impacts due to the COVID-19 pandemic, including DTLA's recovery of the 22 million visitors and \$10 billion in visitor-related spending that DTLA experienced in its 2019 record-breaking year.
2. Meet state and regional goals to build 455,000 new residential units in LA over the next 8 years – 120,000 of these units are expected to be built in DTLA.
3. Address climate change through new transit-oriented residential and job development
4. Position DTLA to receive the maximum amount of federal, state, local and private funding for crucial zero-emission transportation projects such as the LA Streetcar, West Santa Ana Branch, the proposed aerial tram from Union Station to Dodger Stadium, new 6th Street Station in the Arts District, and LADOT and Metro's expanded EV bus network.
5. Support a safe walking, transit and driving and parking experience for all in DTLA
6. Create a robust Enhanced Infrastructure Finance District (EIFD) as DTLA once had through the former Community Redevelopment Agency (CRA), which could be valued in the billions of dollars for DTLA, if the DTLA 2040 Plan creates an expedited development process at the scale originally proposed. EIFD funds can be used to address homelessness, create new affordable housing, and support the tremendous infrastructure needs of DTLA.

We ask the Planning Department to change the DTLA 2040 Plan to include the LA Streetcar on all maps, and to increase the number of residential units allowable by right in DTLA due to transit-adjacent zoning along the LA Streetcar route, and to expedite the entitlement process so that DTLA can fully recover more rapidly from the COVID-19 recession. (Please see attached LA Streetcar map)

The Los Angeles Streetcar is an important component of DTLA's EV mobility future

The zero-emission LA Streetcar will improve DTLA's mobility, transportation-oriented planning and accelerate DTLA's economic recovery due to the 2020 COVID-19 pandemic:

- The LA Streetcar is predicted to serve 6,000 to 8,000 riders per day – over 2 million rides per year – which reduces driving and gridlock on DTLA's streets. With cars running every 7 minutes at peak hours, every 10 minutes in the afternoons, and every 15 minutes in the evenings, Streetcars will encourage more people to ride transit rather than drive or own a car in DTLA (see attached map).
- LA Streetcar's 2014 economic study predicted \$1.1 billion in new DTLA construction and economic benefits.

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- Additionally, the LA Streetcar route links numerous hotels and visitor destinations to the LA Convention Center, which will assist our convention, visitor and restaurant economy in its recovery from the pandemic.
- The LA Streetcar connects to five Metro rail stations – Pico/Flower, 7th St/Metro Center, Pershing Square, Grand Park/Civic Center and the future Regional Connector station of 2nd/Broadway -- and numerous bus routes along the Streetcar route.
- The LA Streetcar route includes bike/scooter lanes on 7th Street, Figueroa, and 11th Street, and is one block away from the two-way Spring Street cycle tracks. People can bring their bicycles and scooters (and strollers and wheelchairs) directly onto the LA Streetcar.
- The LA Streetcar route will encourage streetcar riders to complement their trips with EV buses and active transportation modes.

Economic Recovery

As Downtown Los Angeles (DTLA) continues to suffer from the economic effects of the COVID-19 virus, we request that City Planning reevaluate the financial feasibility of the DTLA 2040 Community Benefits System in light of the current economic realities of COVID-19.

While we recognize that the virus-related recession will not be present during the entire life of the DTLA 2040 Plan, we know that it will take many years for DTLA's economic recovery, as DTLA experienced after the 2008 recession. The DTLA 2040 Plan's current affordable housing bonus provisions will make much of the planned development financially infeasible, and at minimum, Level 1 of the Community Benefits System should provide a more substantial FAR increase to support the feasibility of high-rise construction, which is usually the most cost-effective construction typology for dense urban areas like DTLA.

Residential Development and a Robust EIFD

We recommend that building height maximums and live-work requirements in the Arts District and Fashion District be eliminated. We also recommend that the base Floor Area Ratio (FAR) calculations which were reduced in the Historic Core, Fashion District, Chinatown and Little Tokyo be restored, and that mixed income and mixed-use housing development be supported in all of these areas.

Without these changes to height and mixed income units, DTLA will not be able to create the 120,000 transit-oriented residential units envisioned for DTLA in the Regional Housing Needs Assessment (RHNA) and included in the recently approved Southern California Association of Governments (SCAG) Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS).

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The City is in the process of creating an Enhanced Infrastructure Finance District (EIFD) in DTLA, which will allow the City to estimate future property tax revenue and bond against future property tax increment in order to support crucial homeless and affordable housing and infrastructure development necessary to fully recover from the COVID-19 recession. Allowing for mixed income development in all areas of DTLA will ensure that many income levels would benefit from transit, services and amenities and promote greater recovery of restaurant and retail options throughout DTLA. In addition, mixed-income projects are more likely to be financially feasible and stay on the property tax rolls, thereby further contributing to tax increment financing in the future EIFD.

As DTLA experienced with the Community Redevelopment Agency (CRA) before it was dissolved, the greater the allowable development in an area combined with an expedited development process, the greater the tax increment investments that can be made to address DTLA's myriad housing and mobility needs in the future EIFD planned for DTLA. We support specific provisions for spending EIFD revenues to fund affordable and homeless housing.

We urge these changes in height limits and use restrictions to be reconsidered immediately, as the reduction in allowable development not only affects residential and commercial development, but also affects the ability to garner state and federal funds for the transportation projects needed to support a clean, efficient mobility network.

Transportation and Transit-Oriented Development

We recommend that the Planning Department add the fully entitled zero-emission LA Streetcar, proposed Metro West Santa Ana Branch, proposed Metro 6th Street Station in the Arts District, and new bus-only lanes for the expanded EV bus network onto the DTLA 2040 maps, and expand the transit-oriented development potential near these transportation projects.

As greater development is planned in conjunction with these transportation investments, the City of Los Angeles and Metro's transportation funding applications will be more competitive for federal and state funds. In addition, SCAG's RTP/SCS and the Executive Orders of Governor Gavin Newsom require that new development be located near transit to reduce vehicle miles traveled (VMT) and improve our air quality. Expanding the development potential along zero emission transit routes like the one entitled for the LA Streetcar will also add to EIFD calculations discussed above, while garnering the crucial federal and state financing needed to complete these projects.

We appreciate the Planning Department for reiterating that DTLA is the economic and development engine of Los Angeles, and for envisioning the ways that the DTLA 2040 Plan can stoke this engine. Uniting a strong DTLA 2040 Plan with a robust EIFD and targeted multi-modal clean transportation investment strategy, DTLA can avoid a deep recession and help the City of Los Angeles address its growing budget deficit and tourism and unemployment challenges.

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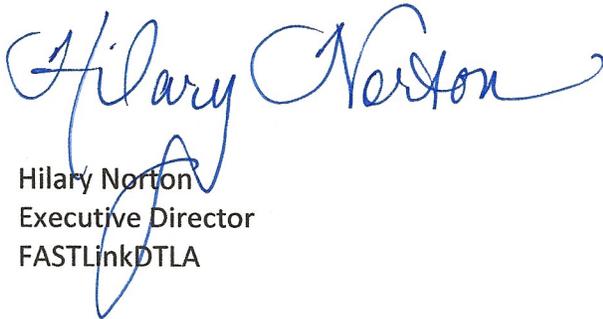
We urge the Planning Department to address the recommended changes to the DTLA 2040 Plan so that DTLA can recover from this recession and emerge even stronger than before and make all of the preparations necessary to host international events such as the Superbowl of 2022 and many other events culminating in the Olympics and Paralympics in 2028.

We look forward to implementing this amended plan with the Planning Department, and fast-tracking Los Angeles' economic, transportation, housing and visitor recovery together.

If you have any questions, please do not hesitate to contact me at (213) 448-2900.

Thank you for your time and consideration.

Warm regards,



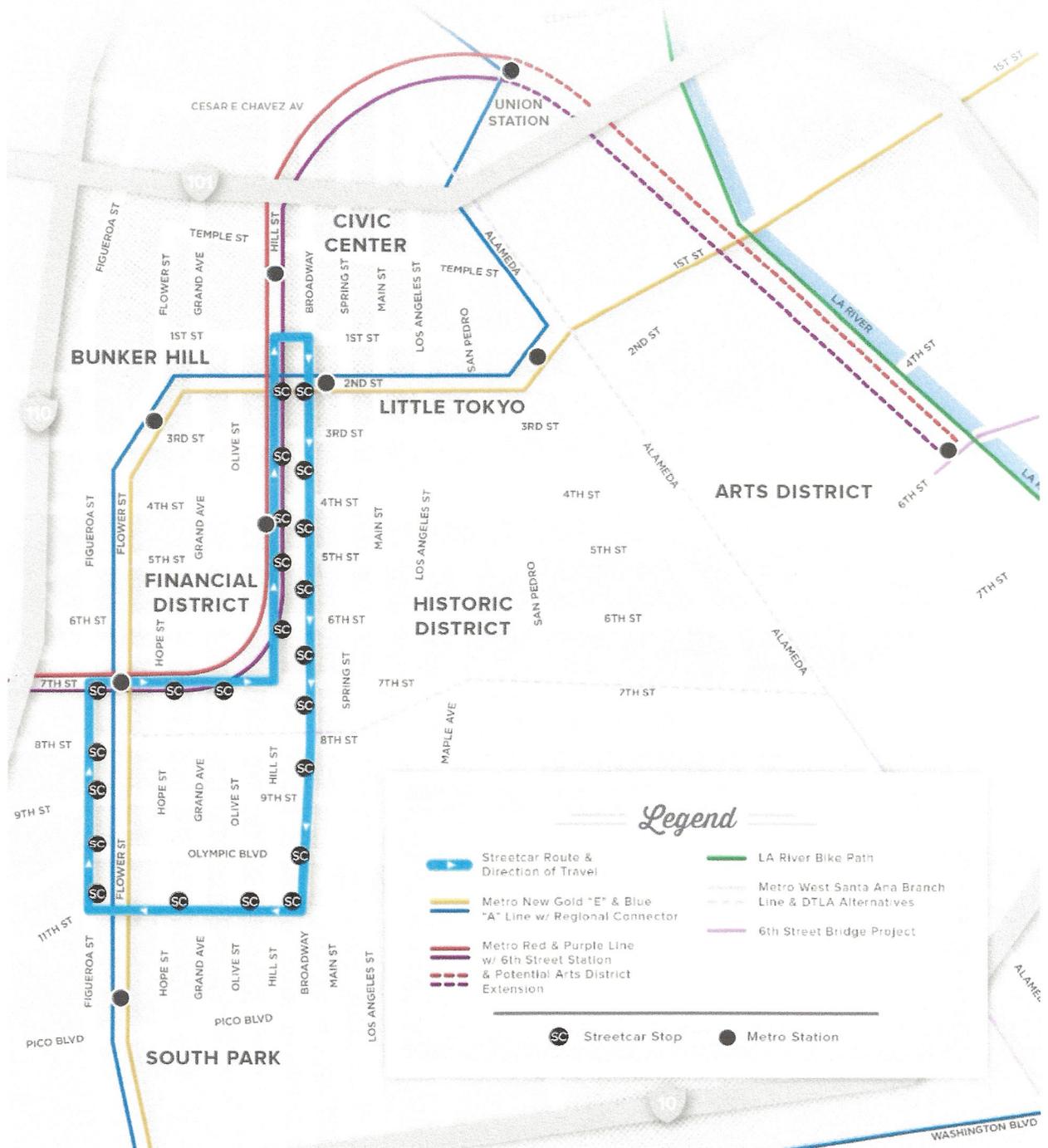
Hilary Norton
Executive Director
FASTLinkDTLA

Project Map on next page

CC: Vince Bertoni, GM, LA City Planning Department
Councilmember Kevin de Leon and all City Councilmembers
Mayor Eric Garcetti
Seleta Reynolds, GM, LADOT
Phil Washington, CEO, Metro

Los Angeles

STREETCAR!



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January 13, 2021

Brittany Arceneaux,
City Planner City of Los Angeles Department of City Planning
200 North Spring Street, Room 667
Los Angeles, CA 90012

By Email: Brittany.arceneaux@lacity.org

About: Comments On DTLA 2040 Community Plan or Draft EIR of Summer 2020

Dear Ms. Arceneaux;

1. A Role for History? Please note that the new DTLA or Downtown Area contains some of the oldest history of the City of Los Angeles, dating back to 1781 in the European period. Accordingly, the DTLA 2040 Community Plan should consider capturing the key aspects, unique to this Community Plan compared to the other 34. Earliest expansions out of the original El Pueblo settlement were northward (Chinatown today) and southward following ease in geography, so the Chinatown neighborhood, namely the old Central City North, is custodian to some of the most important historical and cultural assets of the City (not just those attributable to a Chinese American community). A succession of peoples has come through this immediate area as documented on Native American camps, more on Mexican, to French and then Italians, then the Chinese from the diaspora of Old Chinatown, and even the Southeast Asians, mainly of Chinese background today. Some of the oldest remaining multi-story buildings of the earliest urban development remain intact. I am concerned that the draft does not seem to appreciate the advantages of these special historical assets in the text, integrating them in the goals and objectives of DTLA 2040 in the Plan Vision, and in the main narrative as an important potential direction for development. An added sentence or paragraph in some sections would help balance a perspective [note in LU 14.2] and give the flexibility which the “Village” zoning really provides, even though for a neighborhood like Chinatown, key overlay zones are not yet complete or in place. There are obviously opportunities here throughout this district in terms of preservation and adaptive reuse methods. [LU Goal 19]. There seems to be a huge City legacy in Chinatown of City North that should be offered in Plan thinking of the next 20-25 years.
 - a. Role for History: On Zoning. The proposed New Code will designate the commercial core of ‘Chinatown as “Village.” This new definition I hope will guide toward some of the opportunities discussed above for preservation and honoring of the cultural assets. Yet, as expansive the proposed boundaries are, the designation cuts out New High and North Spring Streets south of College to Chavez Blvd. from “Village.” I believe that inclusion of these streets might be considered in your revision. Particularly, North Spring Street from Ord to Chavez, and along Ord, does delineate an historic urban zone, which included some of the oldest legacy businesses and buildings of the community. North Spring Street itself demarcates the track of the Zanja Madre, the oldest water course into the early urban core. There is evidence that the main pipe is intact underground. This same stretch of North Spring also is location for some of the early history of New Chinatown after the resettlement from Old Chinatown and housed a Chinese presence since the mid-1880’s. Therefore, I would request a consideration to amend the New Code to extend “Village” eastward to Alameda Street and at least to add discussion on the heritage of this area in the Community Plan. The CSDG statement [below] also expresses a similar opinion.

- b. New High, North Spring are two Chinatown streets perhaps suited to future new block corridor concepts for legacy sidewalk marketing such as now operating on Broadway between 3rd and 4th and vendors on Alvarado in the Pico-Union district. Some of that is already going on. This is another incentive to amend the zoning. The opportunity can be noted somewhere in Markets [LU Goal 34?] or [Mobility and Connectivity, but it is not quite stated as a MC Goal, but maybe should.]
- c. Role for History: Historical and Cultural Resources and Traditional Core sections. Virtually by definition of the zoning for “Village,” the ethnic and cultural commercial cores of Chinatown (and Little Tokyo), planning for these neighborhoods fit well under LU Goals 12, 13, and 14 for Historical and Cultural Resources, which are copious. A sentence or so or more in guidance for the Community Plan user is recommended to connect this section to the New Code. Likewise, the “Village” zoning ties the two neighborhoods to the ideas for LU Goal 25, policies for the Traditional Core. In fairness on page 32 of the draft there is a box to summarize districts under LU Goal 25; there are two equally important to the City that must be mentioned that are on the National Register: Little Tokyo Historic District, and El Pueblo Monument (Los Angeles Plaza Historic District). Nominations were started for the Chinatown Central Plaza and West Chinatown. I contend that the properties and activities there are worthy of note and the Chinatown blocks might be listed as well as a future opportunity. El Pueblo as a government entity is categorized in “Neighborhoods” and discussed below, but it is an indigenous part of Chinatown history.
- d. Role for History: supporting resources. For the Villages, Chinatown and Little Tokyo, context statements have recently been completed by the Office of Historic Resources in the Department of Planning. It would seem at the very least, such Planning documentation might be part of the final references or bibliography of the Community Plan and support documentation of the New Code. Another example may be the nomination applications for Historic District and for the National Register, which are part of archives. [Implementation section?].

2. Connectivity and Linkages. In the Community Plan, the existence of Government Areas and the Cornfield-Arroyo Seco Plan (CASP), denoted “Neighborhoods” receives cursory mention. Unfortunately, for Central City North and especially Chinatown, which is contiguous to many of these areas, inclusion and understanding of these linkages connecting neighborhoods is crucial to the function (and limitations) of the “Village” areas and their related regions. For Chinatown, that includes the residential and community center zonings adjacent to the commercial core. For example, Chinatown relates to the El Pueblo Monument, the seat of the Old Chinatown, to the State Historic Park, the old Cornfield adjacent, and even the CASP zone, where new Asian enterprise and small businesses are emerging. Moving into the next 25 years, these relationships to the Chinatown neighborhood might be recognized as unique. Again, a few sentences or a paragraph will help create the balance and flexibility in future planning immeasurably. [LU Goal 52?]

Thank you for your patience and attention. Thank you and your team also for keeping Chinatown informed through this important process.

Sincerely yours,

Munson Kwok, Ph.D.

For ID only: Past President and Member, Board of Officers (Directors), Los Angeles Chinese American Citizens Alliance

Member, Board of Directors of El Pueblo Park Association and Asian and Pacific Islander Americans in Historic Preservation.



Jordan Hallman <jordan.hallman@lacity.org>

Fwd: LARABA/ADCCLA Comments for DTLA Community Plan

1 message

Brittany Arceneaux <brittany.arceneaux@lacity.org>

Mon, Jan 11, 2021 at 4:49 PM

To: Valerie Watson <valerie.watson@lacity.org>, Craig Weber <craig.weber@lacity.org>, Jordan Hallman <jordan.hallman@lacity.org>, Clare Kelley <clare.kelley@lacity.org>, Veena Snehansh <veena.snehansh@lacity.org>, Alice Okumura <alice.okumura@lacity.org>

FYI

----- Forwarded message -----

From: **Laura Velkei** <laura@adccla.org>

Date: Mon, Jan 11, 2021 at 1:14 PM

Subject: LARABA/ADCCLA Comments for DTLA Community Plan

To: Brittany Arceneaux <brittany.arceneaux@lacity.org>

Cc: Arts District Community Council LA <info@adccla.org>, LARABA <info@laraba.org>

Hi Brittany -

Attached are all our comments, questions and letters to be submitted for this final phase of the Community Plan review. While we are aware they have been submitted under the DEIR period, they are all applicable to our POV for this phase as well.

We wanted to include the work we did on the matter that garnered hundreds of signatures supporting the Arts District Ordinance which we submitted to City Planning. Highlights of the ordinance included:

- Minimum average size unit size of 1000 square ft (this is adjusted from 750 minimum)
- 1.5 FAR Commercial Space
- Post & Beam Construction
- Type one and Two Construction
- Historic & Contributing Buildings

In 2015, the Arts District Community submitted a [land-use ordinance](#) to the City of Los Angeles reflecting the desires of the community and to ensure the long term health and sustainability of the Arts District.

The [plan](#) was presented to the city as an alternative to the Hybrid Industrial Ordinance as it was more reflective of the community goals vs outside developer goals promoted by the now-indicted former council member Huizar.

Over 325 people signed the [petition](#) supporting the Arts District drafted plan. So as not to clutter up your inbox, the Ordinance submitted to the City and was offered to stakeholders in petition form again can be found [here](#). A pdf version is also attached. (Timestamps and emails can be provided if needed)

In addition, all 3 of the Community Boards in the Arts District drafted and [submitted letters](#) as to their position on the matter.

We respectfully request that this petition and the linked letters previously submitted be included in the record and that the will of our community be enforced over the outside interests of other stakeholders not living or working in the community.

Please let me know if you need me to send the pdf of the org letters in addition to the links, we just wanted to have this on file before 5.

Happy New Year!

Laura

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Laura Velkei
Chair of Land Use, Communications Director
Arts District Community Council LA
www.adccla.org

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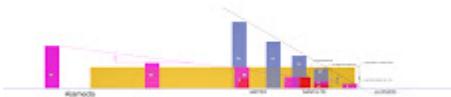
LOS ANGELES
CITY PLANNING

Brittany Arceneaux
She, Her, Hers
City Planner
Los Angeles City Planning
200 N. Spring St., Room 667
Los Angeles, CA 90012
Planning4LA.org
T: (213) 978-1911

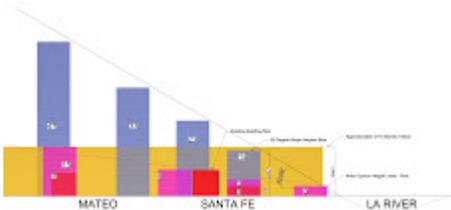


Please note I am out of the office every other Friday.

6 attachments



Height Section-Diagram- Comparison of Requirements-IMPACT.jpg
368K



Height Section-Diagram- Comparison of Requirements-IMPACT-zoom.jpg
576K

-  **CPC - Our Letter & Signers - ONLINE PETITION.pdf**
420K
-  **20 12-4 ADDCLA re DTLA Comm Plan DEIR DRAFT.pdf**
249K
-  **Community plan review 9-3-19-V3.pdf**
249K
-  **final - AD Community Plan Feedback.pdf**
503K

Los Angeles **STREETCAR!**

January 5, 2020

Brittany Arceneaux, City Planner
Department of City Planning
City of Los Angeles
200 North Spring Street, Room 667
Los Angeles, CA 90012

Sent via e-mail due to COVID-19 pandemic:

Brittany.arceneaux@lacity.org

downtownplan@lacity.org

RE: Comments on the DTLA 2040 Plan and Support for the LA Streetcar and DTLA EIFD

Dear Ms. Arceneaux,

On behalf of Los Angeles Streetcar, Inc (LASI) and our board members and supporters, we are writing to urge that the Planning Department include in the DTLA 2040 Plan the fully entitled LA Streetcar route and commensurate transit-oriented related zoning along the entirety of the LA Streetcar route.

The zero-emission LA Streetcar will improve DTLA's mobility, transportation-oriented planning and accelerate DTLA's economic recovery due to the 2020 COVID-19 pandemic:

- The LA Streetcar is predicted to serve 6,000 to 8,000 riders per day – over 2 million rides per year – which reduces driving and gridlock on DTLA's streets. With cars running every 7 minutes at peak hours, every 10 minutes in the afternoons, and every 15 minutes in the evenings, Streetcars will encourage more people to ride transit rather than drive or own a car in DTLA (see attached map).
- LA Streetcar's 2014 economic study predicted \$1.1 billion in new DTLA construction and economic benefits.
- Additionally, the LA Streetcar route links numerous hotels and visitor destinations to the LA Convention Center, which will assist our convention, visitor and restaurant economy in its recovery from the pandemic.
- The LA Streetcar connects to five Metro rail stations – Pico/Flower, 7th St/Metro Center, Pershing Square, Grand Park/Civic Center and the future Regional Connector station of 2nd/Broadway -- and numerous bus routes along the Streetcar route.
- The LA Streetcar route includes bike/scooter lanes on 7th Street, Figueroa, and 11th Street, and is one block away from the two-way Spring Street cycle tracks. People can bring their bicycles and scooters (and strollers and wheelchairs) directly onto the LA Streetcar.
- The LA Streetcar route will encourage streetcar riders to complement their trips with EV buses and active transportation modes.

Specific recommendations for the DTLA 2040 Plan

We write today to provide comments on the DEIR for the DTLA 2040 Plan, expressing our concerns that certain elements included the current version of the DTLA 2040 Plan will severely impact the City of Los Angeles' and Downtown Los Angeles (DTLA)'s ability to:

1. Recover from the severe economic and development impacts due to the COVID-19 pandemic, including DTLA's recovery of the 22 million visitors and \$10 billion in visitor-related spending that DTLA experienced in its 2019 record-breaking year.
2. Meet state and regional goals to build 455,000 new residential units in LA over the next 8 years – 120,000 of these units are expected to be built in DTLA.
3. Address climate change through new transit-oriented residential and job development
4. Position DTLA to receive the maximum amount of federal, state, local and private funding for crucial zero-emission transportation projects such as the LA Streetcar, West Santa Ana Branch, new 6th Street Station in the Arts District, and expanded EV bus network.
5. Create a robust Enhanced Infrastructure Finance District (EIFD) as DTLA once had through the former Community Redevelopment Agency (CRA), which could be valued in the billions of dollars for DTLA, if the DTLA 2040 Plan creates an expedited development process at the scale originally proposed. EIFD funds can be used to address homelessness, create new affordable housing, and support the tremendous infrastructure needs of DTLA.

We ask the Planning Department to change the DTLA 2040 Plan to include the LA Streetcar on all maps, and to increase the number of residential units allowable by right in DTLA due to transit-adjacent zoning along the LA Streetcar route, and to expedite the entitlement process so that DTLA can fully recover more rapidly from the COVID-19 recession. (Please see attached LA Streetcar map)

Economic Recovery

As Downtown Los Angeles (DTLA) continues to suffer from the economic effects of the COVID-19 virus, we request that City Planning reevaluate the financial feasibility of the DTLA 2040 Community Benefits System in light of the current economic realities of COVID-19.

While we recognize that the virus-related recession will not be present during the entire life of the DTLA 2040 Plan, we know that it will take many years for DTLA's economic recovery, as DTLA experienced after the 2008 recession. The DTLA 2040 Plan's current affordable housing bonus provisions will make much of the planned development financially infeasible, and at minimum, Level 1 of the Community Benefits System should provide a more substantial FAR increase to support the feasibility of high-rise construction, which is usually the most cost-effective construction typology for dense urban areas like DTLA.

Residential Development and a Robust EIFD

We recommend that building height maximums and live-work requirements in the Arts District and Fashion District be eliminated. We also recommend that the base Floor Area Ratio (FAR) calculations which were reduced in the Historic Core, Fashion District, Chinatown and Little Tokyo be restored, and that mixed income and mixed-use housing development be supported in all of these areas.

Without these changes to height and mixed income units, DTLA will not be able to create the 120,000 transit-oriented residential units envisioned for DTLA in the Regional Housing Needs Assessment (RHNA) and included in the recently approved Southern California Association of Governments (SCAG) Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS).

The City is in the process of creating an Enhanced Infrastructure Finance District (EIFD) in DTLA, which will allow the City to estimate future property tax revenue and bond against future property tax increment in order to support crucial homeless and affordable housing and infrastructure development necessary to fully recover from the COVID-19 recession. Allowing for mixed income development in all areas of DTLA will ensure that many income levels would benefit from transit, services and amenities and promote greater recovery of restaurant and retail options throughout DTLA. In addition, mixed-income projects are more likely to be financially feasible and stay on the property tax rolls, thereby further contributing to tax increment financing in the future EIFD. As DTLA experienced with the Community Redevelopment Agency (CRA) before it was dissolved, the greater the allowable development in an area combined with an expedited development process, the greater the tax increment investments that can be made to address DTLA's myriad housing and mobility needs in the future EIFD planned for DTLA.

We urge these changes to be reconsidered immediately, as the reduction in allowable development not only affects residential and commercial development, but also affects the ability to garner state and federal funds for the transportation projects needed to support a clean, efficient mobility network.

Transportation and Transit-Oriented Development

We recommend that the Planning Department add the fully entitled zero-emission LA Streetcar, proposed Metro West Santa Ana Branch, proposed Metro 6th Street Station in the Arts District, and new bus-only lanes for the expanded EV bus network onto the DTLA 2040 maps, and expand the transit-oriented development potential near these transportation projects.

As greater development is planned in conjunction with these transportation investments, the City of Los Angeles and Metro's transportation funding applications will be more competitive for federal and state funds. In addition, SCAG's RTP/SCS and the Executive Orders of Governor Gavin Newsom require that new development be located near transit to reduce vehicle miles traveled (VMT) and improve our air quality. Expanding the development potential along zero emission transit routes like the one entitled for the LA Streetcar will also add to EIFD calculations discussed above, while garnering the crucial federal and state financing needed to complete these projects.

We appreciate the Planning Department for reiterating that DTLA is the economic and development engine of Los Angeles, and for envisioning the ways that the DTLA 2040 Plan can stoke this engine. Uniting a strong DTLA 2040 Plan with a robust EIFD and targeted multi-modal clean transportation investment strategy, DTLA can avoid a deep recession and help the City of Los Angeles address its growing budget deficit and tourism and unemployment challenges.

We urge the Planning Department to address the recommended changes to the DTLA 2040 Plan so that DTLA can recover from this recession and emerge even stronger than before and make all of the preparations necessary to host international events such as the Superbowl of 2022 and many other events culminating in the Olympics and Paralympics in 2028.

If you have any questions, please do not hesitate to contact me at (213) 626-5321.

Sincerely,

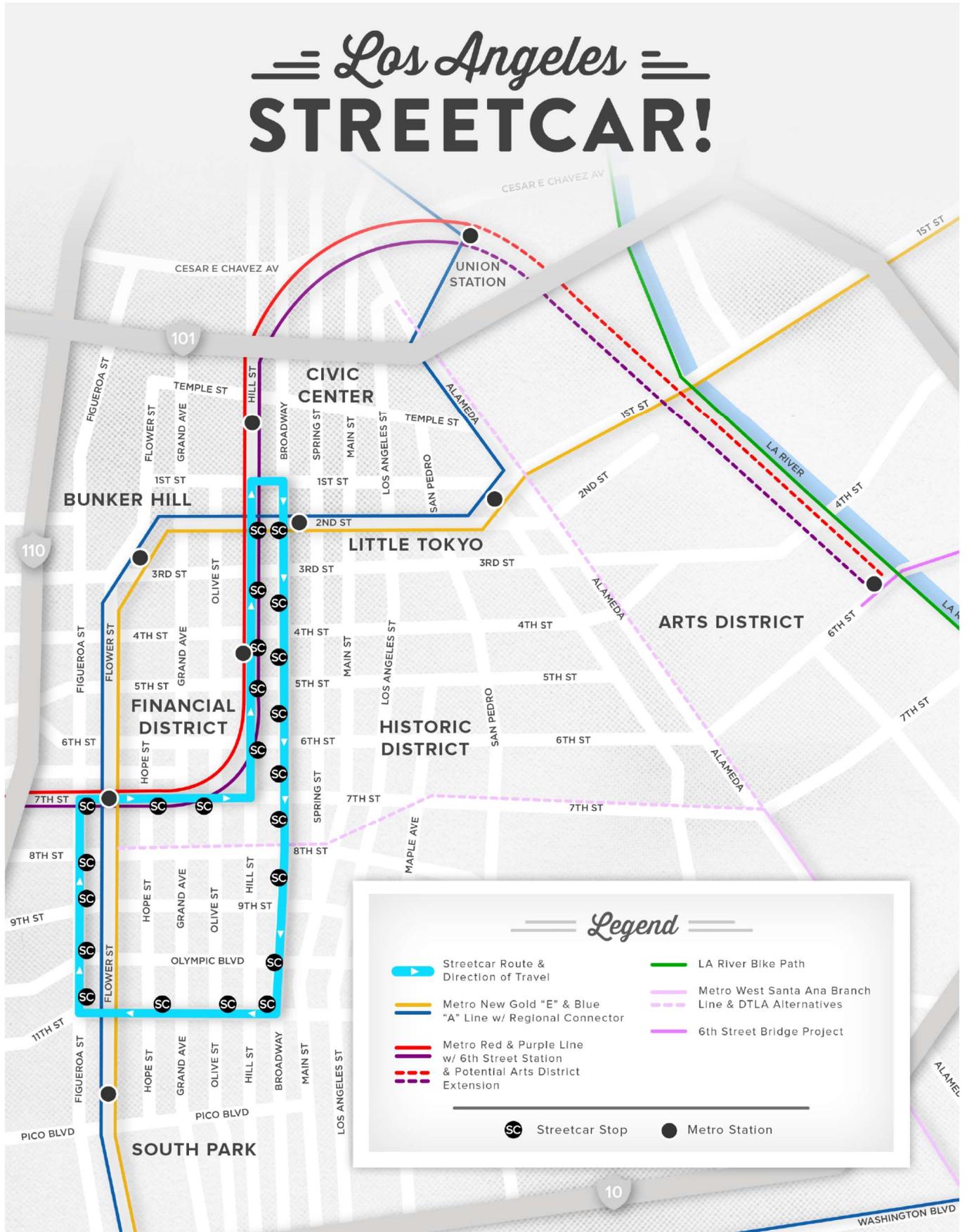


Steve Needleman
Chairman of the Board
Los Angeles Streetcar, Inc

JAN -7 2021
SN

Project Map on next page

Los Angeles STREETCAR!





950 Stadium LLC
Brasa Capital Management
2029 Century Park East, Suite 2070
Los Angeles, CA 90067

Mr. Craig Weber
Principal City Planner & Division Head
Community Planning
Department of City Planning
200 N. Spring Street, Room 667
Los Angeles, CA 90012

Re: Comments on DTLA 2040 Draft Community Plan

Dear Mr. Weber:

As owners of 950 Stadium Way, we are concerned about the restrictive recommendations in the November 2020 version of the DTLA 2040 Draft Plan which would downzone the property and change the applicable Transit Oriented Community provisions. Housing development should be encouraged on this site and neighboring properties within walking distance from Metro's Chinatown station. With the City's need to encourage development of affordable housing, we would expect the Draft Plan to increase incentives and zoning potential for sites like this near transit, rather than decreasing it as recommended in the most recent draft. With the impact of the pandemic, incentives are even more important.

Downzoning is inconsistent with the Draft Plan's stated goal to address the need for housing near transit. More recent drafts, such as the August 2020 draft, allowed for a base FAR of 3:1 and 4 stories of height, with bonus FAR under the TOC Incentives program of up to 4.5:1 FAR and bonus height up to 8 stories. Yet the November 2020 Draft Plan provides base density of 1.5:1, half of that permitted by existing zoning, and even with bonuses would cap FAR at 3:1 while eliminating the City's TOC Incentives program which is available under existing zoning. The November 2020 Draft Plan would also limit base height to 3 stories and bonus height to 6 stories.

It is unclear why the City reduced FAR and imposed stricter height limitations in this location which is walkable to transit. The reductions in FAR may render it infeasible to build a viable project under the base FAR allocations, and certainly place a large financial burden on projects to obtain the FAR that was already provided under the current zoning code and recommended in earlier versions of the Draft Plan.

Before the pandemic, when many development plans were put on hold, we were working with the City in connection with a proposed application to develop 58 dwelling units on the Property,

with six of those units being developed as Extremely Low Income households, and a FAR of 2.7:1. In order to do so, we would use TOC's Tier 3 incentives for a 30 percent reduction in required side yards, a 22-foot increase in the permitted height, and to permit averaging of density, floor area, parking, open space, and access across parcels within the same legal lot. As an example of the restrictive nature of the current proposal, under the November 2020 Draft Plan, a project design like this would not be possible.

The City should revise its proposed zoning for the property, and utilize at the very least, the zoning proposed in the August 2020 draft that was also analyzed in the DEIR. In addition, the City should not eliminate the TOC Incentive program in order to allow for projects such as the one discussed with the City, which includes units for Extremely Low Income households. Beyond the flexibility provided in the form of height increases and setback relief, among others, the TOC Incentive program allows for increased FAR, with a FAR increase between 40 percent and 55 percent depending on the tier utilized. In contrast, the FAR increase for providing affordable housing in the Draft Plan begins at only 35 percent, at the lowest end of the City's affordable housing incentive programs. The City should not abandon the TOC Incentives program without providing a comparable, if not more substantial, FAR increase in the Draft Plan.

We thank you for your time and attention to our comments.



Elliot Weinstock
Director, Brasa Capital



January 13, 2021

Mr. Vince Bertoni
Director of Planning
Department of City Planning
200 N. Spring St, 5th floor
Los Angeles, CA 90012

Re: Downtown LA 2040 Community Plan – Support for Earlier Summer 2020 Plan Version

Dear Mr. Bertoni,

Thank you for the opportunity to comment on the forthcoming update to the Downtown LA Community Plan. Linc Housing is a statewide nonprofit builder of affordable housing and a longtime partner in the City's effort to address our housing crisis, creating rental communities for low-income families, seniors, and special needs populations, including people who've experienced homelessness. In Los Angeles, we have built 570 apartment homes, with 275+ in the pipeline.

The DTLA 2040 Community Plan update is an opportunity to ensure a sustainable future for Downtown, which must include the realization of its vision for safe and affordable housing at all income levels. While the development of affordable housing is a stated priority in the Policies and Goals of the Plan, **some of the November 2020 proposals will work against affordability and increase the cost of building affordable housing. As an example, there are suggestions for the Arts District that would limit the ability to fully provide necessary housing, including:**

- Prohibits Type V construction
- Requires 1000 sq. ft. minimum unit sizes
- Requires live/work floor layouts
- Imposes FAR limits and height limits to areas that formerly had unlimited heights under the previous draft plan
- Relies upon a nexus study for public benefits that was undertaken prior to Covid-19 market realities

The City of Los Angeles is one of the nation's most unaffordable housing markets, its housing shortage a result of exclusionary zoning, systemic racism, and longstanding constraints on denser housing production, combined with a lack of sufficient funding for affordable housing production and preservation. High rents and a lack of housing opportunities have led to alarming financial pressures on families, increased homelessness, displacement of historically disadvantaged communities, additional commute time creating more pollution,



and reduced access to economic and educational opportunity. Many of these challenges are now further exacerbated by the Covid-19 crisis.

We ask for the following changes to the current draft of the DTLA 2040 Plan, so as to ensure critical housing needs are met over the next 20 years:

- Modify the requirement that residential buildings in Subarea A.3 that use the density bonus program must make at least 30% of the building's units two bedrooms or larger. Encourage production of affordable family units by introducing a "super-density bonus" tier throughout Downtown, for projects that make at least 30% of the building's two bedrooms or larger.
- Amend the Industrial-Mixed Use 2 (IX2) and Hybrid Industrial 2 (HI2) zones to allow all residential housing types. Do not restrict housing options in these areas to live-work units only.
- Restore the proposed base FAR from the Summer 2020 version of the Plan, eliminate proposed maximum building heights, and implement the maximum bonus FAR proposed in the Draft Environmental Impact Report's Alternative 3.

A Downtown Community Plan update that incorporates these policies will be true to its vision of advancing the common goals of housing affordability, socioeconomic equity, economic prosperity, and environmental sustainability. Thank you for your consideration and your efforts on this important endeavor.

Sincerely,

A handwritten signature in cursive script that reads "Becky".

Rebecca Clark
CEO
Linc Housing

A handwritten signature in cursive script that reads "Suny".

Suny Lay Chang
President
Linc Housing



華埠商業發展區
C H I N A T O W N
B U S I N E S S I M P R O V E M E N T D I S T R I C T

January 10, 2021

Brittany Arceneaux
City Planner
Department of City Planning
CITY OF LOS ANGELES
200 North Spring Street, Room 667
Los Angeles, CA 90012

SENT VIA ELECTRONIC MAIL (Brittany.Arceneaux@lacity.org)

RE: Comments on Draft DTLA 2040 Plan

Dear Ms. Arceneaux,

The Los Angeles Chinatown Business Council (Chinatown Business Improvement District) was established in 2000 to creatively plan, manage and facilitate the rebirth of historic Chinatown as a multinational, culturally defined, economically vibrant and socially engaging community. Located just north of Downtown Los Angeles, the CBID boundaries encompass approximately 34 blocks,¹ comprising a diverse group of property owners, business owners and community stakeholders that includes families that were part of the original founding of New Chinatown in 1938.

We offer the following comments about the most recent draft of the DTLA 2040 plan (“the Plan”):

Failed Community Benefits System in Chinatown.

Chinatown has experienced first-hand that a community benefits system may have the unintended consequence of discouraging housing development. Adopted in 2013, “[t]he goal of the [Cornfield Arroyo Seco Specific Plan] CASP is to encourage development of a mixed-use neighborhood that concentrates higher densities around transit, preserves and develops affordable housing, and fosters economic growth. The CASP includes several innovative strategies to encourage investment and development within the plan area.”² As “innovative” as some considered the CASP³, the plan has failed to produce any new housing units, affordable or market

¹ Henning, Edward V. (2020, August 4). *Proposed Chinatown Property & Business Improvement District Assessment Engineer’s Report*. Edward Henning and Associates.

² Keyser Marston Associates. (n.d.). *Cornfield Arroyo Seco Specific Plan (CASP)*. Keyser Marston Associates. <https://keysermarston.com/project/cornfield-arroyo-seco-specific-plan-casp>

³ Among its awards was the American Planning Association California Chapter’s Award of Excellence for Comprehensive Plan – Large Jurisdiction (2014).



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CHINATOWN

BUSINESS IMPROVEMENT DISTRICT

rate; no new residential uses have been constructed or converted in existing buildings.⁴ Like the DTLA 2040 Plan, the Department of City Planning evaluated the financial feasibility of allowing increases in scale in return for the inclusion of affordable housing units and other community benefits.

Arbitrary limitation on hotel density.

The current Central City North Community Plan designates a significant portion of Chinatown's commercial corridors as Regional Commercial with no height restriction, an FAR of 6.0 and R5 density (no limitation on guest rooms). Yet, in the most recent draft of the DTLA 2040 Plan, Chinatown's commercial corridors have a use district designation of CX1, which arbitrarily places a 49-bed limit on lodging projects despite the well-documented shortage of hotels rooms in the Downtown area and its negative impact on business at the Convention Center.⁵

Downzoning during a housing crisis.

During a time when the state is streamlining the production of housing, including with Senate Bill 330 ("The Housing Crisis Act of 2019")—which limits down-zoning actions for housing—the City of Los Angeles proposes to reduce FAR by as much as 66-percent in Chinatown. While the intent of the limitation is to encourage the use of the Community Benefits System, the City's own analysis of the system acknowledges that Chinatown is "unlikely to support larger high-rise developments until market performance matures further, and thus are not able to support public benefits to the same degree as...strong submarkets."⁶ The current DTLA 2040 regulations will make high rise development infeasible, unfairly relegating Chinatown to one high-rise residential building⁷ despite our proximity to Union Station, the largest railroad passenger terminal in the Western United States.⁸ While some neighborhoods in the DTLA 2040 geography are designated for base FARs of 6.0 to 9.0, Chinatown is being left out, with a base FAR of as little as 2.0 along our major thoroughfares—again, where the current Central City North designation allows a 6.0 FAR and no height restriction.

Arbitrary commercial space limitations discourage new businesses.

Limitations on the size of ground-floor commercial spaces make it unnecessarily difficult to attract viable, neighborhood-serving uses and are not the appropriate tool for retaining and attracting small businesses. By prohibiting larger "anchor" tenants, this policy may have the unintended

⁴ Juarez, G., Urita-Lopez, H., Weber, C. (2019, January 10). *Department of City Planning Recommendation Report* [Case No. CPC-2018-5580-SP]. Department of City Planning.

⁵ Reference for example, Maree Borland, K. (2016 November 14). *Hotels Shortage Causes Loss in Revenue for DTLA*. GlobeSt.com. Retrieved from www.globest.com/sites/kelsimareeborland/2016/11/14/hotels-shortage-causes-loss-in-revenue-for-dtla

⁶ HR&A Advisors. (2019, October). *Downtown Los Angeles Community Benefit Program: Summary of Analysis & Recommendations*. HR&A Advisors.

⁷ While there are three high-rise residential projects proposed in Chinatown, Cathay Manor is the only built residential high-rise building in Chinatown. All its units are age- and income-restricted.

⁸ Los Angeles County Metropolitan Transportation Authority. (n.d.). *Union Station History*. Los Angeles County Metropolitan Transportation Authority. <https://www.metro.net/about/union-station/history/>



Jordan Hallman <jordan.hallman@lacity.org>

Please support this plan

1 message

Grace Bell <k.grace.bell@everyactioncustom.com>

Mon, Dec 14, 2020 at 2:19 PM

Reply-To: k.grace.bell@gmail.com

To: downtownplan@lacity.org

Dear Downtown Plan,

Thank you for the opportunity to comment on the forthcoming update to the Downtown Community Plan. I'm writing on behalf of Abundant Housing LA, a pro-housing education and advocacy organization working to help solve Southern California's housing crisis. AHLA supports efforts to promote equity and reform land use regulations and zoning codes, and expand housing production at all levels of income.

As you know, the City of Los Angeles is suffering from a severe housing crisis. Exclusionary zoning, systemic racism, and longstanding constraints on denser housing production, combined with a lack of sufficient funding for affordable housing production and preservation, have led to a massive housing shortage. This has made Los Angeles one of the nation's most unaffordable housing markets. High rents and a lack of new housing opportunities have caused greater financial pressure on families, longer commutes, increasing carbon emissions, more displacement of historically disadvantaged communities, high homelessness, and reduced access to economic and educational opportunity. This has also reinforced longstanding patterns of income and racial segregation in our city's neighborhoods.

The Downtown Community Plan is an important step in meeting the needs of our Downtown residents, and its policies will promote more housing affordability.

I support the Plan for these reasons. I also ask for these additional changes to reduce car dependence and meet housing needs:

Restore the proposed base FAR from the summer 2020 version of the Plan, eliminate proposed maximum building heights, and implement the maximum bonus FAR proposed in the Draft Environmental Impact Report's Alternative 3.

Modify the requirement that residential buildings in Subarea A.3 that use the density bonus program must make at least 30% of the building's units two bedrooms or larger. Encourage production of affordable family units by introducing a "super-density bonus" tier throughout Downtown, for projects that make at least 30% of the building's two bedrooms or larger.

Introduce a parking maximum on new construction, and introduce a per-space fee on all existing and new parking lots and garages in Downtown.

Amend the Industrial-Mixed Use 2 (IX2) and Hybrid Industrial 2 (HI2) zones to allow all residential housing types. Do not restrict housing options in these areas to live-work units only.

A Downtown Community Plan update that incorporates these policies will help advance our common goals of housing affordability, socioeconomic equity, economic prosperity, and environmental sustainability. Thank you for your consideration, and for your hard work on this important project.

Personally sent by Grace Bell using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,

Grace Bell

232 E 2nd St Los Angeles, CA 90012-4082

k.grace.bell@gmail.com



Jordan Hallman <jordan.hallman@lacity.org>

Please support this plan

1 message

Joshua Blumenkopf <jblumenkopf@everyactioncustom.com>

Mon, Dec 14, 2020 at 2:28 PM

Reply-To: jblumenkopf@gmail.com

To: downtownplan@lacity.org

Dear Downtown Plan,

Thank you for the opportunity to comment on the forthcoming update to the Downtown Community Plan. I'm writing on behalf of Abundant Housing LA, a pro-housing education and advocacy organization working to help solve Southern California's housing crisis. AHLA supports efforts to promote equity and reform land use regulations and zoning codes, and expand housing production at all levels of income.

As you know, the City of Los Angeles is suffering from a severe housing crisis. Exclusionary zoning, systemic racism, and longstanding constraints on denser housing production, combined with a lack of sufficient funding for affordable housing production and preservation, have led to a massive housing shortage. This has made Los Angeles one of the nation's most unaffordable housing markets. High rents and a lack of new housing opportunities have caused greater financial pressure on families, longer commutes, increasing carbon emissions, more displacement of historically disadvantaged communities, high homelessness, and reduced access to economic and educational opportunity. This has also reinforced longstanding patterns of income and racial segregation in our city's neighborhoods.

The Downtown Community Plan is an important step in meeting the needs of our Downtown residents, and its policies will promote more housing affordability.

I support the Plan for these reasons. I also ask for these additional changes to reduce car dependence and meet housing needs:

Restore the proposed base FAR from the summer 2020 version of the Plan, eliminate proposed maximum building heights, and implement the maximum bonus FAR proposed in the Draft Environmental Impact Report's Alternative 3. Modify the requirement that residential buildings in Subarea A.3 that use the density bonus program must make at least 30% of the building's units two bedrooms or larger. Encourage production of affordable family units by introducing a "super-density bonus" tier throughout Downtown, for projects that make at least 30% of the building's two bedrooms or larger.

Amend the Industrial-Mixed Use 2 (IX2) and Hybrid Industrial 2 (HI2) zones to allow all residential housing types. Do not restrict housing options in these areas to live-work units only.

A Downtown Community Plan update that incorporates these policies will help advance our common goals of housing affordability, economic prosperity, and environmental sustainability. Thank you for your consideration, and for your hard work on this important project.

Personally sent by Joshua Blumenkopf using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Joshua Blumenkopf
290 N Hudson Ave Apt 112E Pasadena, CA 91101-4427
jblumenkopf@gmail.com



Jordan Hallman <jordan.hallman@lacity.org>

Please support this plan

1 message

Brent Bovenzi <brent.bovenzi@everyactioncustom.com>

Mon, Dec 14, 2020 at 2:33 PM

Reply-To: brent.bovenzi@gmail.com

To: downtownplan@lacity.org

Dear Downtown Plan,

Thank you for the opportunity to comment on the forthcoming update to the Downtown Community Plan. I'm writing on behalf of Abundant Housing LA, a pro-housing education and advocacy organization working to help solve Southern California's housing crisis. AHLA supports efforts to promote equity and reform land use regulations and zoning codes, and expand housing production at all levels of income.

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Personally sent by Brent Bovenzi using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,

Brent Bovenzi

631 Indiana Ave Venice, CA 90291-3013

brent.bovenzi@gmail.com



Jordan Hallman <jordan.hallman@lacity.org>

Please support this plan

1 message

Jessica Brennan <jsscbrennan@everyactioncustom.com>

Mon, Dec 14, 2020 at 3:15 PM

Reply-To: jsscbrennan@gmail.com

To: downtownplan@lacity.org

Dear Downtown Plan,

Thank you for the opportunity to comment on the forthcoming update to the Downtown Community Plan. I'm writing on behalf of Abundant Housing LA, a pro-housing education and advocacy organization working to help solve Southern California's housing crisis. AHLA supports efforts to promote equity and reform land use regulations and zoning codes, and expand housing production at all levels of income.

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Personally sent by Jessica Brennan using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,

Jessica Brennan

206 E Avenue 38 Los Angeles, CA 90031-1507

jsscbrennan@gmail.com



Jordan Hallman <jordan.hallman@lacity.org>

Please support this plan

1 message

Kerry Brown <kklbrown67@everyactioncustom.com>

Mon, Jan 11, 2021 at 4:22 PM

Reply-To: kklbrown67@yahoo.com

To: downtownplan@lacity.org

Dear Downtown Plan,

Thank you for the opportunity to comment on the forthcoming update to the Downtown Community Plan. I'm writing on behalf of Abundant Housing LA, a pro-housing education and advocacy organization working to help solve Southern California's housing crisis. AHLA supports efforts to promote equity and reform land use regulations and zoning codes, and expand housing production at all levels of income.

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Personally sent by Kerry Brown using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,

Kerry Brown

1060 Junipero Ave Long Beach, CA 90804-3505

kklbrown67@yahoo.com



Jordan Hallman <jordan.hallman@lacity.org>

Please support this plan

1 message

Elizabeth Bugayong <ebugayong@everyactioncustom.com>

Mon, Dec 14, 2020 at 5:26 PM

Reply-To: ebugayong@gmail.com

To: downtownplan@lacity.org

Dear Downtown Plan,

Thank you for the opportunity to comment on the forthcoming update to the Downtown Community Plan. I'm writing on behalf of Abundant Housing LA, a pro-housing education and advocacy organization working to help solve Southern California's housing crisis. AHLA supports efforts to promote equity and reform land use regulations and zoning codes, and expand housing production at all levels of income.

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Personally sent by Elizabeth Bugayong using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,

Elizabeth Bugayong

7600 W Manchester Ave Playa Del Rey, CA 90293-8451

ebugayong@gmail.com



Jordan Hallman <jordan.hallman@lacity.org>

Please support this plan

1 message

Nicholas Burns III <nkburns3@everyactioncustom.com>

Mon, Dec 14, 2020 at 2:24 PM

Reply-To: nkburns3@gmail.com

To: downtownplan@lacity.org

Dear Downtown Plan,

Thank you for the opportunity to comment on the forthcoming update to the Downtown Community Plan. I'm writing on behalf of Abundant Housing LA, a pro-housing education and advocacy organization working to help solve Southern California's housing crisis. AHLA supports efforts to promote equity and reform land use regulations and zoning codes, and expand housing production at all levels of income.

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Personally sent by Nicholas Burns III using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,

Mr. Nicholas Burns III

1740 S Westgate Ave Unit H Los Angeles, CA 90025-3792

nkburns3@gmail.com



Jordan Hallman <jordan.hallman@lacity.org>

Please support this plan

1 message

Carly Curiel <carly@everyactioncustom.com>

Mon, Dec 14, 2020 at 2:21 PM

Reply-To: carly@activesgv.org

To: downtownplan@lacity.org

Dear Downtown Plan,

Thank you for the opportunity to comment on the forthcoming update to the Downtown Community Plan. I'm writing on behalf of Abundant Housing LA, a pro-housing education and advocacy organization working to help solve Southern California's housing crisis. AHLA supports efforts to promote equity and reform land use regulations and zoning codes, and expand housing production at all levels of income.

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Personally sent by Carly Curiel using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,

Carly Curiel

1808 Eckhart Ave Rosemead, CA 91770-3936

carly@activesgv.org



Jordan Hallman <jordan.hallman@lacity.org>

Please support this plan

1 message

Cece Debarge <Crownccakra@everyactioncustom.com>

Tue, Dec 15, 2020 at 3:12 PM

Reply-To: Crownccakra@gmail.com

To: downtownplan@lacity.org

Dear Downtown Plan,

Thank you for the opportunity to comment on the forthcoming update to the Downtown Community Plan. I'm writing on behalf of Abundant Housing LA, a pro-housing education and advocacy organization working to help solve Southern California's housing crisis. AHLA supports efforts to promote equity and reform land use regulations and zoning codes, and expand housing production at all levels of income.

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Personally sent by Cece Debarge using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,

Cece Debarge

2269 W Washington Blvd Apt 6 Los Angeles, CA 90018-1449

Crownccakra@gmail.com



Jordan Hallman <jordan.hallman@lacity.org>

Please support this plan

1 message

Nina Dooley <ndooley@everyactioncustom.com>

Wed, Dec 23, 2020 at 7:06 PM

Reply-To: ndooley@verizon.net

To: downtownplan@lacity.org

Dear Downtown Plan,

Thank you for the opportunity to comment on the forthcoming update to the Downtown Community Plan. I'm writing on behalf of Abundant Housing LA, a pro-housing education and advocacy organization working to help solve Southern California's housing crisis. AHLA supports efforts to promote equity and reform land use regulations and zoning codes, and expand housing production at all levels of income.

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Personally sent by Nina Dooley using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,

Nina Dooley

610 S Gertruda Ave Redondo Beach, CA 90277-4245

ndooley@verizon.net



Jordan Hallman <jordan.hallman@lacity.org>

Please support this plan

1 message

Meagan English <meagan.english@everyactioncustom.com>

Tue, Dec 15, 2020 at 4:44 AM

Reply-To: meagan.english@gmail.com

To: downtownplan@lacity.org

Dear Downtown Plan,

Thank you for the opportunity to comment on the forthcoming update to the Downtown Community Plan. I'm writing on behalf of Abundant Housing LA, a pro-housing education and advocacy organization working to help solve Southern California's housing crisis. AHLA supports efforts to promote equity and reform land use regulations and zoning codes, and expand housing production at all levels of income.

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Personally sent by Meagan English using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,

Meagan English

1152 N Kingsley Dr Los Angeles, CA 90029-1355

meagan.english@gmail.com



Jordan Hallman <jordan.hallman@lacity.org>

Please support this plan

1 message

Charles Felder <charlie.felder@everyactioncustom.com>

Mon, Dec 14, 2020 at 2:52 PM

Reply-To: charlie.felder@gmail.com

To: downtownplan@lacity.org

Dear Downtown Plan,

Thank you for the opportunity to comment on the forthcoming update to the Downtown Community Plan. I'm writing on behalf of Abundant Housing LA, a pro-housing education and advocacy organization working to help solve Southern California's housing crisis. AHLA supports efforts to promote equity and reform land use regulations and zoning codes, and expand housing production at all levels of income.

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Personally sent by Charles Felder using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,

Charles Felder

131 S Avenue 63 Los Angeles, CA 90042-3671

charlie.felder@gmail.com



Jordan Hallman <jordan.hallman@lacity.org>

Please support this plan

1 message

Brad Foley <brfoley76@everyactioncustom.com>

Mon, Dec 14, 2020 at 3:12 PM

Reply-To: brfoley76@gmail.com

To: downtownplan@lacity.org

Dear Downtown Plan,

Thank you for the opportunity to comment on the forthcoming update to the Downtown Community Plan. I'm writing on behalf of Abundant Housing LA, a pro-housing education and advocacy organization working to help solve Southern California's housing crisis. AHLA supports efforts to promote equity and reform land use regulations and zoning codes, and expand housing production at all levels of income.

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Personally sent by Brad Foley using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,

Brad Foley

2702 S Normandie Ave Los Angeles, CA 90007-2114

brfoley76@gmail.com



Jordan Hallman <jordan.hallman@lacity.org>

Please support this plan

1 message

Andy Freeland <andy@everyactioncustom.com>

Mon, Dec 14, 2020 at 5:04 PM

Reply-To: andy@andyfreeland.net

To: downtownplan@lacity.org

Dear Downtown Plan,

Thank you for the opportunity to comment on the forthcoming update to the Downtown Community Plan. I'm writing on behalf of Abundant Housing LA, a pro-housing education and advocacy organization working to help solve Southern California's housing crisis. AHLA supports efforts to promote equity and reform land use regulations and zoning codes, and expand housing production at all levels of income.

As you know, the City of Los Angeles is suffering from a severe housing crisis. Exclusionary zoning, systemic racism, and longstanding constraints on denser housing production, combined with a lack of sufficient funding for affordable housing production and preservation, have led to a massive housing shortage. This has made Los Angeles one of the nation's most unaffordable housing markets. High rents and a lack of new housing opportunities have caused greater financial pressure on families, longer commutes, increasing carbon emissions, more displacement of historically disadvantaged communities, high homelessness, and reduced access to economic and educational opportunity. This has also reinforced longstanding patterns of income and racial segregation in our city's neighborhoods.

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I support the Plan for these reasons. I also ask for these additional changes to reduce car dependence and meet housing needs:

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A Downtown Community Plan update that incorporates these policies will help advance our common goals of housing affordability, socioeconomic equity, economic prosperity, and environmental sustainability. Thank you for your consideration, and for your hard work on this important project.

Personally sent by Andy Freeland using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,

Andy Freeland

645 W 9th St Apt 516 Los Angeles, CA 90015-1651

andy@andyfreeland.net



Jordan Hallman <jordan.hallman@lacity.org>

Please support this plan

1 message

Esteban Garcia <esteban@everyactioncustom.com>

Mon, Dec 14, 2020 at 1:47 PM

Reply-To: esteban@abundanthousingla.org

To: downtownplan@lacity.org

Dear Downtown Plan,

Thank you for the opportunity to comment on the forthcoming update to the Downtown Community Plan. I'm writing on behalf of Abundant Housing LA, a pro-housing education and advocacy organization working to help solve Southern California's housing crisis. AHLA supports efforts to promote equity and reform land use regulations and zoning codes, and expand housing production at all levels of income.

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Personally sent by Esteban Garcia using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,

Mr Esteban Garcia

2669 Olive St Walnut Park, CA 90255-6323

esteban@abundanthousingla.org



Jordan Hallman <jordan.hallman@lacity.org>

Please support this plan

1 message

Rebecca Gimple <beckygimple@everyactioncustom.com>

Mon, Dec 14, 2020 at 2:48 PM

Reply-To: beckygimple@gmail.com

To: downtownplan@lacity.org

Dear Downtown Plan,

Thank you for the opportunity to comment on the forthcoming update to the Downtown Community Plan. I'm writing on behalf of Abundant Housing LA, a pro-housing education and advocacy organization working to help solve Southern California's housing crisis. AHLA supports efforts to promote equity and reform land use regulations and zoning codes, and expand housing production at all levels of income.

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Personally sent by Rebecca Gimple using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,

Ms. Rebecca Gimple

333 E Fairview Ave Apt 218 Glendale, CA 91207-2241

beckygimple@gmail.com



Jordan Hallman <jordan.hallman@lacity.org>

Please support this plan

1 message

Carol Gordon <thecarolanngordon@everyactioncustom.com>

Mon, Dec 14, 2020 at 4:13 PM

Reply-To: thecarolanngordon@gmail.com

To: downtownplan@lacity.org

Dear Downtown Plan,

Thank you for the opportunity to comment on the forthcoming update to the Downtown Community Plan. I'm writing on behalf of Abundant Housing LA, a pro-housing education and advocacy organization working to help solve Southern California's housing crisis. AHLA supports efforts to promote equity and reform land use regulations and zoning codes, and expand housing production at all levels of income.

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Personally sent by Carol Gordon using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,

Mrs Carol Gordon

2801 Glendower Ave Los Angeles, CA 90027-1118

thecarolanngordon@gmail.com



Jordan Hallman <jordan.hallman@lacity.org>

Please support this plan

1 message

Roderick Hall <roderick@everyactioncustom.com>

Tue, Dec 15, 2020 at 3:45 PM

Reply-To: roderick@abundanthousingla.org

To: downtownplan@lacity.org

Dear Downtown Plan,

Thank you for the opportunity to comment on the forthcoming update to the Downtown Community Plan. I'm writing on behalf of Abundant Housing LA, a pro-housing education and advocacy organization working to help solve Southern California's housing crisis. AHLA supports efforts to promote equity and reform land use regulations and zoning codes, and expand housing production at all levels of income.

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Personally sent by Roderick Hall using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,

Mr. Roderick Hall

669 S Union Ave Apt 618 Los Angeles, CA 90017-1662

roderick@abundanthousingla.org



Jordan Hallman <jordan.hallman@lacity.org>

Please support this plan

1 message

Jack Humphreville <lajack@everyactioncustom.com>

Tue, Dec 15, 2020 at 7:08 AM

Reply-To: lajack@gmail.com

To: downtownplan@lacity.org

Dear Downtown Plan,

Thank you for the opportunity to comment on the forthcoming update to the Downtown Community Plan. I'm writing on behalf of Abundant Housing LA, a pro-housing education and advocacy organization working to help solve Southern California's housing crisis. AHLA supports efforts to promote equity and reform land use regulations and zoning codes, and expand housing production at all levels of income.

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Personally sent by Jack Humphreville using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,

Jack Humphreville

456 S Arden Blvd Los Angeles, CA 90020-4736

lajack@gmail.com



Jordan Hallman <jordan.hallman@lacity.org>

Please support this plan

1 message

Thomas Irwin <thomasirwin13@everyactioncustom.com>

Mon, Dec 14, 2020 at 2:46 PM

Reply-To: thomasirwin13@gmail.com

To: downtownplan@lacity.org

Dear Downtown Plan,

Thank you for the opportunity to comment on the forthcoming update to the Downtown Community Plan. I'm writing on behalf of Abundant Housing LA, a pro-housing education and advocacy organization working to help solve Southern California's housing crisis. AHLA supports efforts to promote equity and reform land use regulations and zoning codes, and expand housing production at all levels of income.

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Personally sent by Thomas Irwin using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,

Thomas Irwin

962 S Woods Ave East Los Angeles, CA 90022-3931

thomasirwin13@gmail.com



Jordan Hallman <jordan.hallman@lacity.org>

Please support this plan

1 message

Tami Kagan-Abrams <tami@everyactioncustom.com>

Mon, Dec 14, 2020 at 3:32 PM

Reply-To: tami@abramsgroup.org

To: downtownplan@lacity.org

Dear Downtown Plan,

Thank you for the opportunity to comment on the forthcoming update to the Downtown Community Plan. I'm writing on behalf of Abundant Housing LA, a pro-housing education and advocacy organization working to help solve Southern California's housing crisis. AHLA supports efforts to promote equity and reform land use regulations and zoning codes, and expand housing production at all levels of income.

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Personally sent by Tami Kagan-Abrams using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,

Tami Kagan-Abrams

2430 Hercules Dr Los Angeles, CA 90046-1634

tami@abramsgroup.org



Jordan Hallman <jordan.hallman@lacity.org>

Please support this plan

1 message

Luke Klipp <lukehklipp@everyactioncustom.com>

Mon, Dec 14, 2020 at 4:24 PM

Reply-To: lukehklipp@gmail.com

To: downtownplan@lacity.org

Dear Downtown Plan,

Thank you for the opportunity to comment on the forthcoming update to the Downtown Community Plan. I'm writing on behalf of Abundant Housing LA, a pro-housing education and advocacy organization working to help solve Southern California's housing crisis. AHLA supports efforts to promote equity and reform land use regulations and zoning codes, and expand housing production at all levels of income.

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Personally sent by Luke Klipp using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,

Mr. Luke Klipp

1320 N Hoover St Los Angeles, CA 90027-6008

lukehklipp@gmail.com



Jordan Hallman <jordan.hallman@lacity.org>

Please support this plan

1 message

Arjun Kolachalam <arjunk@everyactioncustom.com>

Mon, Dec 14, 2020 at 2:17 PM

Reply-To: arjunk@hey.com

To: downtownplan@lacity.org

Dear Downtown Plan,

Thank you for the opportunity to comment on the forthcoming update to the Downtown Community Plan. I'm writing on behalf of Abundant Housing LA, a pro-housing education and advocacy organization working to help solve Southern California's housing crisis. AHLA supports efforts to promote equity and reform land use regulations and zoning codes, and expand housing production at all levels of income.

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Personally sent by Arjun Kolachalam using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,

Arjun Kolachalam

1514 N Avenue 55 Los Angeles, CA 90042-1812

arjunk@hey.com



Jordan Hallman <jordan.hallman@lacity.org>

Please support this plan

1 message

Ryan Koyanagi <ryank.pf@everyactioncustom.com>

Mon, Dec 14, 2020 at 4:15 PM

Reply-To: ryank.pf@gmail.com

To: downtownplan@lacity.org

Dear Downtown Plan,

Thank you for the opportunity to comment on the forthcoming update to the Downtown Community Plan. I'm writing on behalf of Abundant Housing LA, a pro-housing education and advocacy organization working to help solve Southern California's housing crisis. AHLA supports efforts to promote equity and reform land use regulations and zoning codes, and expand housing production at all levels of income.

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Personally sent by Ryan Koyanagi using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,

Mr. Ryan Koyanagi

1210 Redwood View Dr Pomona, CA 91766-4117

ryank.pf@gmail.com



Jordan Hallman <jordan.hallman@lacity.org>

Please support this plan

1 message

Y Lim <yurhelee@everyactioncustom.com>

Wed, Dec 30, 2020 at 9:31 PM

Reply-To: yurhelee@gmail.com

To: downtownplan@lacity.org

Dear Downtown Plan,

Thank you for the opportunity to comment on the forthcoming update to the Downtown Community Plan. I'm writing on behalf of Abundant Housing LA, a pro-housing education and advocacy organization working to help solve Southern California's housing crisis. AHLA supports efforts to promote equity and reform land use regulations and zoning codes, and expand housing production at all levels of income.

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Personally sent by Y Lim using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,

Y Lim

1120 S Grand Ave Apt 818 Los Angeles, CA 90015-4380

yurhelee@gmail.com



Jordan Hallman <jordan.hallman@lacity.org>

Please support this plan

1 message

Tyler Lindberg <tindberg@everyactioncustom.com>

Mon, Dec 14, 2020 at 2:14 PM

Reply-To: tindberg@iteris.com

To: downtownplan@lacity.org

Dear Downtown Plan,

Thank you for the opportunity to comment on the forthcoming update to the Downtown Community Plan. I'm writing on behalf of Abundant Housing LA, a pro-housing education and advocacy organization working to help solve Southern California's housing crisis. AHLA supports efforts to promote equity and reform land use regulations and zoning codes, and expand housing production at all levels of income.

As you know, the City of Los Angeles is suffering from a severe housing crisis. Exclusionary zoning, systemic racism, and longstanding constraints on denser housing production, combined with a lack of sufficient funding for affordable housing production and preservation, have led to a massive housing shortage. This has made Los Angeles one of the nation's most unaffordable housing markets. High rents and a lack of new housing opportunities have caused greater financial pressure on families, longer commutes, increasing carbon emissions, more displacement of historically disadvantaged communities, high homelessness, and reduced access to economic and educational opportunity. This has also reinforced longstanding patterns of income and racial segregation in our city's neighborhoods.

The Downtown Community Plan is an important step in meeting the needs of our Downtown residents, and its policies will promote more housing affordability.

I support the Plan for these reasons. I also ask for these additional changes to reduce car dependence and meet housing needs:

Restore the proposed base FAR from the summer 2020 version of the Plan, eliminate proposed maximum building heights, and implement the maximum bonus FAR proposed in the Draft Environmental Impact Report's Alternative 3.

Modify the requirement that residential buildings in Subarea A.3 that use the density bonus program must make at least 30% of the building's units two bedrooms or larger. Encourage production of affordable family units by introducing a "super-density bonus" tier throughout Downtown, for projects that make at least 30% of the building's two bedrooms or larger.

Introduce a parking maximum on new construction, and introduce a per-space fee on all existing and new parking lots and garages in Downtown.

Amend the Industrial-Mixed Use 2 (IX2) and Hybrid Industrial 2 (HI2) zones to allow all residential housing types. Do not restrict housing options in these areas to live-work units only.

A Downtown Community Plan update that incorporates these policies will help advance our common goals of housing affordability, socioeconomic equity, economic prosperity, and environmental sustainability. Thank you for your consideration, and for your hard work on this important project.

Personally sent by Tyler Lindberg using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,

Tyler Lindberg

400 S Occidental Blvd Apt 5 Los Angeles, CA 90057-1508

tindberg@iteris.com



LITTLE TOKYO BUSINESS ASSOCIATION
LITTLE TOKYO BUSINESS IMPROVEMENT DISTRICT

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January 12, 2020

Brittany Arceneaux

City Planner

Los Angeles Department of City Planning

200 North Spring Street, Room 667

Los Angeles, CA 90012

Via email: brittany.arceneaux@lacity.org

Re: Comments on ENV-2017-433-EIR: DTLA 2040 Draft Environmental Impact Report (DEIR)

Dear Ms. Arceneaux:

The Little Tokyo Business Association (LTBA), established in 1959, has managed the merchant-based Little Tokyo Business Improvement District (BID) since 2003 and is committed to promoting and enhancing the betterment of Little Tokyo community. We are submitting the following comments pertaining to the DTLA 2040 Draft Environmental Impact Report (DEIR):

Historical Context

After careful review of the City Planning Department's DTLA 2040 Draft Plan, we offer the following comments, which are intended to help ensure that the DTLA 2040 Community Plan not only enhances the vibrancy of the greater Downtown Los Angeles area but also takes into consideration the fragility of culturally significant environmental justice communities like Little Tokyo that are deeply rooted in Downtown LA's past as well as its future.

Since its founding in 1884, Little Tokyo has endured numerous existential threats, from alien land laws in the early 1900s to the forced removal of all persons of Japanese ancestry from the West Coast during World War II and postwar recovery. At its most expansive, Little Tokyo reached from Temple Ave. to 6th Street and from Main Street to Vignes St. Today, Little Tokyo occupies less than one-third of the land mass it once controlled in Downtown L.A.

We have two priorities in mind:

- 1) Our community consists of a balance of market-rate (70%) and affordable housing (30%). In particular, senior housing has contributed significantly in support of the elder population and the community's stability. Although most of the remaining developable land is City-controlled, we believe that additional affordable housing will enhance Little Tokyo's existing socio-economic balance.

- 2) Preserving the history and culture of Little Tokyo and ensuring a protective economic environment for small business is at the heart of LTBA's mission and is a concept that must be embraced within the DTLA 2040 Community Plan.

Building Height Limits/Density

Although City Planning is proposing a low 2:1 and the Central City Association (CCA) seeks higher densities, LTBA prefers a floor area ratio (FAR) of 3:1 density as permitted under the previous Little Tokyo Redevelopment Project. As the symbolic and authentic hub of the Southern California Japanese American community, Little Tokyo is a pedestrian-oriented neighborhood comprised of over 400 mostly small businesses, including restaurants, retail stores, major nonprofits, arts and cultural entities, world-class museums, professional and medical services, and religious institutions.

Zoning

Under the previous Little Tokyo Redevelopment Project, adopted by the L.A. City Council in 1970 and extended through 2014, the zoning density permitted was a 3:1 Floor Area Ratio (FAR). Present zoning in Little Tokyo permits a 6:1 FAR, resulting in the out of scale 9-story apartment building currently under construction on Onizuka Street. Under the City Planning proposal, apartment developments with some affordable housing would also receive a bonus to build to an 8.5:1 FAR. LTBA is committed to protecting existing Little Tokyo buildings from demolition and opposes the construction of high-density developments within our community.

Further study is needed to define and develop a strong position on zoning densities. Community Plan policies and Design Overlay guidelines can be beneficial, but implementation and enforcement require public money and stronger teeth. Zoning is definitive and eventually becomes law. Its weight and potential consequences carry weight and must be taken into consideration.

Land Use Recommendations

Finally, LTBA supports the changes (underlined) suggested by Yukio Kawaratani, former City Planner, whose institutional knowledge includes the Little Tokyo Redevelopment Project.

LU 42.6 Monitor and strengthen the pedestrian elements in Little Tokyo by preserving existing street frontages and internal pathways, enabling commercial uses on the ground plane of all buildings, and supporting the orientation of mid-block paseos.

LU 42.7 Retain, support and reinforce the historic and cultural elements of Little Tokyo, including the businesses and cultural and religious institutions within the community.

LU 42.8 Complete, support and reinforce the Little Tokyo mid-block Pedestrian Spine system to enhance connectivity in Little Tokyo (including the Onizuka Mall and a westerly extension of the pedestrian walkway).

LU 42.9 Support the advancement and expansion of performance and creative arts, including and in addition to the Union Center for the Arts (East/West Players), Japanese American Community & Cultural Center (Aratani Theatre), Japanese American National Museum (Takeuchi Democracy Forum), and Geffen Contemporary at MOCA.

LU 42. Provide measures to mitigate high property values and expensive rents related to gentrification and attributable to activation of the Regional Connector station, that threaten small businesses and the sustainability of Little Tokyo as a viable cultural, ethnic, and environmental justice community.

LU 42. Acquisition and demolition of properties to make way for the construction of high-density developments should be discouraged, especially when small businesses would be negatively impacted.

(B) Add new Policies and Programs to prioritize small businesses, affordable housing, displacement avoidance, inclusive economic development, mobility and support cultural and religious institutions in Village Communities.

Sincerely,

A handwritten signature in black ink, appearing to read 'Masao Mike Okamoto', with a large loop at the beginning and a horizontal line extending to the right.

Masao Mike Okamoto

January 12, 2021

VIA US MAIL AND EMAIL

Department of City Planning
Community Planning Bureau
200 North Spring Street, Room 667
Los Angeles, California 90012
Attention: Mr. Craig Weber
craig.weber@lacity.org
downtownplan@lacity.org

RE: DTLA 2040 Downtown Los Angeles Community Plan Update

Dear Mr. Weber:

Mack Real Estate Group (MREG) is pleased to comment on the Downtown Los Angeles Community Plan Update. Mack Real Estate Group is a vertically integrated, institutional real estate investor, developer, debt capital provider and operator with its roots as a family-owned business dating back to the 1960s. MREG develops, owns and operates real estate projects in major markets in the United States including, Los Angeles, Seattle, Portland, Phoenix, Miami, Atlanta and New York City.

MREG, through its predecessor companies, has been involved in the development of downtown Los Angeles for over 40 years. Most recently, MREG completed two major projects in the South Park neighborhood of downtown Los Angeles -- the high-rise AVEN mixed-use project (537 units in a 38-story building) and the mid-rise WREN mixed-use project (362 units in a 7-story building). Additionally, we have two other land parcels in South Park that are in the entitlement process and will accommodate over 1,200 units. Together, these projects represent an investment of over \$1.2 billion dollars in downtown Los Angeles.

We commend the Department of City Planning on its efforts to develop a long-term land use plan for the growth and development of the downtown Los Angeles. For the past twenty years, downtown Los Angeles has led the City of Los Angeles and the southern California region in building public transit infrastructure and producing high quality housing and jobs. Before the COVID-19 pandemic, downtown Los Angeles was poised to accelerate this trend. By 2040, downtown is projected to build 70,000 housing units, provide 55,000 more jobs and add 125,000 new residents. No other area in Los Angeles presents a similar opportunity to build large amounts of high quality housing and expand employment opportunities.

Mr. Craig Weber
Department of City Planning
January 12, 2021

In this letter, we want to express our concerns on three primary areas: (1) the community benefits requirements necessary to exceed the Base Floor Area Ratio, (2) the form-based design requirements, and (3) the need for the Community Plan Update to include an integrated, comprehensive strategy for developing transportation resources to link the many neighborhoods of downtown Los Angeles.

1. As Presently Structured, the Community Benefits Requirements to Exceed the Base FAR Will Likely Suppress the Development of Market-Rate and Affordable Housing. The DTLA 2040 Community Plan assigns a Base Floor Area Ratio to each parcel in the Community Plan. In order to exceed the Base FAR and utilize Bonus FAR, the project must first provide on-site affordable housing at below-market rent levels and in percentages based on the City's Density Bonus ordinance. We believe that, even in a robust economic environment, the cost of providing the necessary levels of affordable housing in order to exceed the Base FAR will usually render the Bonus FAR economically infeasible. As a result, the City will not receive the benefit of higher density residential development or the affordable units.

This structure will be even more detrimental during the economic conditions that will affect downtown Los Angeles as it recovers from the COVID-19 pandemic. The affordable housing requirements will prevent residential development from exceeding the Base FAR and downtown will have the worst of both worlds – fewer new residential units and no affordable units.

We suggest that the Department of City Planning work with market-rate and affordable housing developers to study in detail the impact of the affordable housing requirements on new development. We will be pleased to participate in that effort. We are confident that together we can create an incentive program that will maximize both more high-density residential development and affordable housing.

For example, the Transfer of Floor Area program (TFAR) available in a limited portion of the Central City plan area is a highly efficient and market-based means of valuing the additional FAR made available to a project. The TFAR program has succeeded in incentivizing high-density residential development and has provided tens of millions of dollars to the City for public benefits. If the TFAR methodology is adapted to the Bonus FAR system and expanded to all of the downtown area, it could generate hundreds of millions of dollars in public benefit revenue. The City should focus these funds to address homelessness and develop housing for low-income families. Alternatively, the community benefit requirements should be redesigned to

Mr. Craig Weber
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January 12, 2021

enhance the economic feasibility of providing affordable housing, such as including workforce housing, reducing the percentages of affordable units and/or increasing the Bonus FAR.

2. Architects and Developers Have Not Had the Opportunity to Adequately Vet the Form-Based Design Requirements. The DTLA 2040 Community Plan also assigns detailed form-based architectural requirements to each parcel. Unlike typical downtown zoning requirements that prescribe only minimal setback or height restrictions, the Community Plan as drafted specifies (i) minimum lot area, (ii) minimum lot width, (iii) minimum building coverage percentage, (iv) minimum lot amenity space, (v) minimum residential amenity space, (vi) maximum base height and maximum bonus height, (vii) upper story step-backs, (viii) height transitions, and (ix) building bulk and mass, such as building breaks and façade breaks. In addition, the frontage requirements specify (i) entrance locations and features, (ii) ground story height, (iii) ground floor elevation, (iv) minimum transparency requirements for ground stories and upper stories, (v) maximum dead wall width, and (vi) landscaping area. In some districts, the requirements prescribe horizontal bands, window details, and exterior and roof materials.

The downtown Community Plan area has a wide range of topography, street types and lot sizes and configurations. In response to these challenges, downtown has produced some of the most innovative and successful architecture and urban design. We are concerned that the overly specific architectural requirements will impede high quality development and stifle architectural creativity in downtown. In particular, the design requirements may hamper architects in finding design solutions that produce economically feasible projects.

Due to the COVID-19 pandemic, downtown property owners and architects have not had an opportunity to review thoroughly the architectural requirements. We suggest that the Department of City Planning take the time to conduct a comprehensive review of the architectural requirements with developers and architects to determine whether the requirements are sufficiently flexible to encourage high quality development and the most innovative architecture.

The Department of City Planning should eliminate the rigid prescriptive form-based design requirements. At a minimum, the new zoning code should include a flexible process by which the developer can obtain relief from the form-based design requirements by meeting the intent of the design standards. Alternatively, the design standards should be repurposed to serve as design guidelines rather than mandatory requirements.

3. The DTLA 2040 Community Plan Should Mandate the Further Development of an Integrated Transportation Plan to Link the Many Downtown Neighborhoods. The Community

Mr. Craig Weber
Department of City Planning
January 12, 2021

Plan's land use regulations will be an important element in helping make downtown Los Angeles a thriving center for jobs, properly located density and a high quality of residential life. However, downtown also needs an integrated strategy for further developing a network of transportation resources to link downtown's neighborhoods. These resources should include DASH buses, the DTLA streetcar, shuttles, a system of bicycle lanes and private transportation services to connect downtown residences and businesses. Moreover, downtown Los Angeles should have a comprehensive streetscape plan that will include street trees, landscaping, open space and sidewalks to create an inviting pedestrian environment throughout downtown. To enhance the public realm, downtown should have a comprehensive plan to build parks and more open space. We hope the Department of City Planning will create a detailed capital improvement workplan for City Council approval and funding that will bring together all of the applicable City departments to create a financeable plan to build the public infrastructure necessary to create a livable and properly planned downtown.

Finally, the COVID-19 pandemic has severely affected the downtown Los Angeles economy, as measured by increased residential and commercial vacancy rates, falling rental rates, and the number of closed restaurants and other businesses. The Department of City Planning should ensure that the implementation of the DTLA 2040 Community Plan does not impede downtown's economic recovery.

We look forward to the further refinement of the Community Plan Update in response to public comments. Please contact me if you would like to discuss any of the ideas presented in this letter.

Sincerely,



Kevin Lindquist
Chief Operating Officer
Mack Real Estate Development

cc:

Councilmember Kevin de León
Councilmember Gilbert Cedillo
Councilmember Curren Price
Mayor Eric Garcetti
Mr. Vince Bertoni
Mr. Paul Keller



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January 12, 2021

BY EMAIL

Craig Weber
City of Los Angeles, Department of City Planning
200 N. Figueroa Street
Los Angeles, CA 90012

**Re: Downtown Los Angeles Community Plan
Update (DTLA 2040) Comment Letter**

On behalf of our client, Pico Company, LLC, we respectfully submit this comment letter regarding the proposed Downtown Los Angeles Community Plan Update (“**DTLA2040**”) published by the City of Los Angeles (the “**City**”) Department of City Planning (the “**Planning Department**”) in November 2020.

As long-time stakeholders in the Community Plan area, we appreciate the concerted effort and amount of outreach that has been made in our community especially in light of the current logistical challenges. Upon review of DTLA2040, we also applaud the City’s effort in providing a new framework and guidance for smarter development practices that will accommodate our community’s and region’s growing needs. Therefore, we submit for your consideration our recommendations to build on the good work to date with the aim of exercising the best planning practices to grow better neighborhoods.

We believe that with the incorporation of our recommendation, DTLA2040 would be more effective in achieving the DTLA2040’s Guiding Principles, local and regional housing and greenhouse reduction goals, while providing a more cohesive transition across neighborhoods by adjusting proposed land use designation and zoning boundaries to more appropriately follow existing neighborhood form, architectural character, and potential development patterns, as outlined further below. The primary result of our proposed recommendation would be to increase the maximum **Bonus Floor Area Ratio (“FAR”)** for Parcel 1 (as identified below) from 8:1 to 10:1 and for Parcel 2 (as identified below) from 8:1 to 13:1 (no change to the base FAR is requested).

The subject parcels are composed of four city blocks bounded by Santee Street to the west, Maple Avenue to the east, 9th Street to the north, and Pico Boulevard to the south (collectively, the “**Property**,” identified on the map below).

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The Property is located in a unique position, at the convergence of varying block configurations and development patterns. It is currently developed with low- to mid-rise commercial retail and office buildings, and several surface parking lots. Surrounding blocks are generally developed with low-rise buildings to the south, and more mid-rise and denser developments to the west and north. DTLA2040 proposes the Markets land use designation and corresponding [DM1-MK1-5] [IX3-FA] [CPIO] zone, which as currently proposed, extends east across Maple Avenue. Our recommendation is to designate Parcel 1 with the Transit Core land use designation (colored dark red) and corresponding [HB1-G1-5] [CX2-FA] [CPIO] zone as it is more aligned with the block to its west, and Parcel 2 with the Traditional Core land use designation (colored bright red) and corresponding [HM1-CHC1-5] [CX2-FA] [CPIO] zone that would be more appropriately shared with the blocks north across 9th Street and west across Santee Street. See below proposed and recommended land use and zoning maps.

Current DTLA2040 Land Use Designation
(Markets)



Recommended Land Use Designation
(Transit and Traditional Core)



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Current DTLA2040 Zoning
[DM1-MK1-5] [IX3-FA] [CPIO]



Recommended Zoning
[HB1-G1-5] [CX2-FA] [CPIO]
[HM1-CHC1-5] [CX2-FA] [CPIO]



The current DTLA2040 Markets designation is intended to create commercial activity centers with retail, housing, and goods movement activities incorporated within very-low to mid-rise buildings. The recommended Transit Core and Traditional Core designations are both intended to create an active, pedestrian-oriented neighborhood with a diverse mix of residential, commercial, office, and neighborhood-serving uses within mid-rise to high-rise buildings. (DTLA2040, pg. 13) As further discussed below, these latter intended activities are more characteristic of Parcels 1 and 2 and should therefore have the zoning extended to have the mechanisms apply.

From a zoning perspective, the current proposed Form District DM1 allows a base FAR of 3:1 and a Bonus FAR of 8:1 by utilizing the DTLA2040 Community Benefits Program. Form District DM1 does not impose a maximum height limit. Use District IX3 would allow a mixture of commercial, light industrial, and office uses, and several residential uses and other compatible uses, including joint live work uses. Frontage MK1 would provide certain ground floor design standards, such as frequent building entry points, to encourage pedestrian activity. There would be no limit on residential density (limited only by FAR).

The recommended HB1 and HM1 Form Districts would similarly allow a 3:1 base FAR and no height limit, but allow a bonus FAR of 10:1 and 13:1, respectively. The recommended CX2 Use District would allow a more diverse mix of commercial, residential, office, restaurant/retail, and community-serving uses. The recommended G1 and CHC1 Frontages are both intended to create a high-quality pedestrian environment through ground floor activation measures, with the CHC1 Frontage providing additional neighborhood character preservation standards.

For the following reasons and as further discussed below, the current proposed Markets zoning designation and corresponding zone for the Property is inconsistent with the existing and proposed

Craig Weber
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future development pattern in the surrounding neighborhood; and instead, we suggest the Transit Core and Traditional Core designations and corresponding zones as more appropriate:

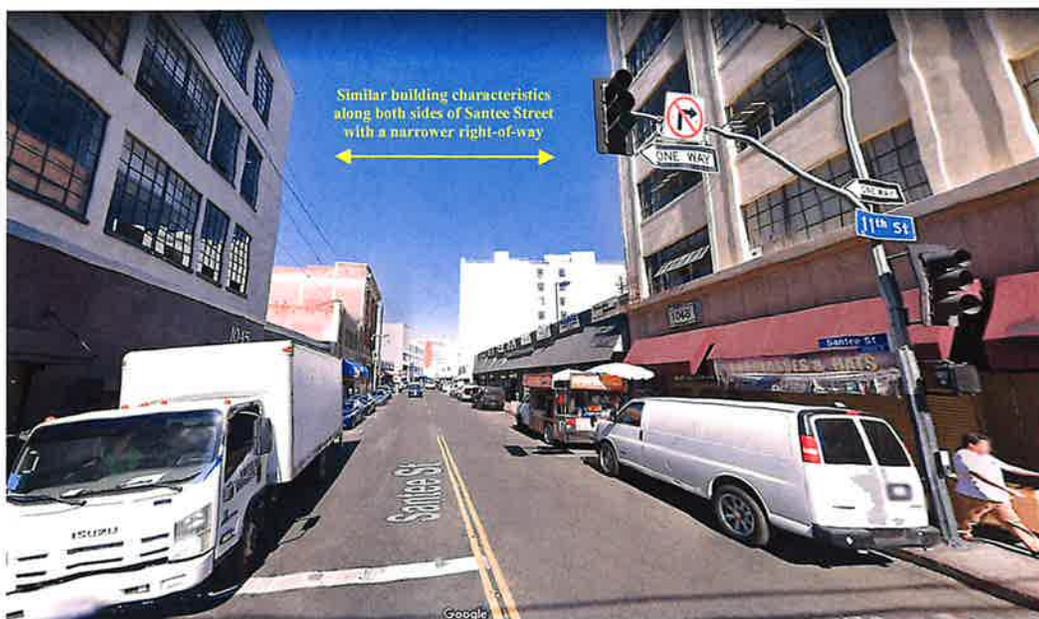
1. Maple Street, and not Santee Street, should be the demarcation line separating the proposed Transit Core and Traditional Core land use designations to the west of the Property from the Property's currently proposed Markets land use designation because (i) Maple Street is a wider (up to 20 feet), longer, and more primary right-of-way than Santee Street; and (ii) Maple Street has direct on-ramp and off-ramp access to the 10 Freeway, while Santee Street does not, which would allow for a better pedestrian-oriented experience, better vehicular circulation, and a more appropriate transition between the Transit Core and Traditional Core land use and the Markets land use.
2. The existing development pattern of the Property is more consistent with the development pattern of the properties to the west of the Property across Santee Street that have low- to mid-rise commercial retail and office buildings, as opposed to properties to the east of the Property across Maple Avenue, which are predominately low-rise retail buildings. Aligning the Property's proposed zoning with the surrounding neighborhood context would be consistent with good planning and zoning practices and allow for a better built environment that more accurately responds to the current and future development patterns and needs of the community.
3. The current DTLA2040 zoning map already identifies parcels to the north and west of the Parcel 2, which have similar existing physical and community characteristics as the Property, with the Traditional Core land use designation and corresponding HM1 Form District that allows a 13:1 Bonus FAR. Likewise, the parcels directly west of Parcel 1, with similar characteristics as the Property, have a Transit Core land use and corresponding HB1 Form District that allows a 10:1 Bonus FAR. Extending the Transit Core land use designation to Parcel 1 and the Traditional Core land use designation to Parcel 2 would allow for a harmonious development pattern and allow the creation of more diverse uses and intensities through the DTLA2040 Community Benefits Program.
4. Consistent with our request to characterize the Property's land use and zoning designation with similarly situated parcels to the west, the Governor and Secretary of U.S. Treasury demarcated the Federal Qualified Opportunity Zone boundaries, using Maple Street and Pico Boulevard as the demarcation line, to include the Property with the similarly situated parcels to the west, rather than the parcels to the east. As such, and as further support that the Property's characteristics are more aligned with the parcels to the west, the Property's land use and zoning designation should also be consistent with the Transit Core and Traditional Core parcels to the west.

As noted above, the Transit Core and Traditional Core land use designations and corresponding zones are more appropriate designations for the Property because they would allow a more diverse mix of commercial uses, including community serving pedestrian-oriented uses that are more suitable along Maple Avenue, which is up to 20 feet wider than Santee, and consistent with the

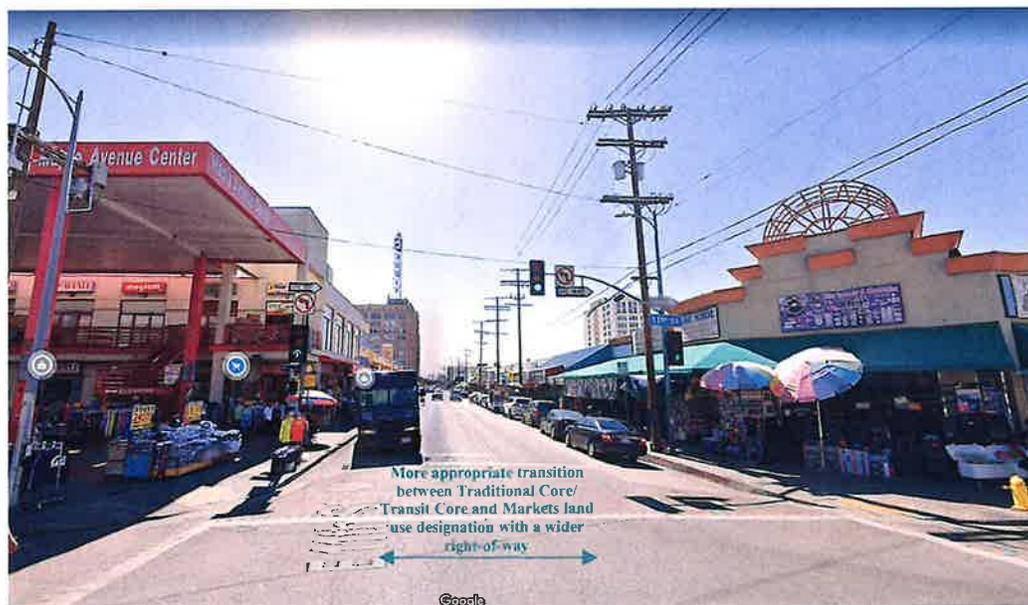
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DTLA 2040 Guiding Principles of promoting a transit, bicycle, and pedestrian-friendly environment, while strengthening neighborhood character by supporting streets that encourage community and human interaction. The following images illustrate the wider Maple Avenue public right-of-way as compared to Santee Street and the similar characteristics of the Property with the parcels to the west of Santee Street.

Santee Street and 11th Street (facing north)



Maple Avenue and 11th Street (facing north)



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Moreover, the suggested Form District HB1 and Form District HM1 would allow a Bonus FAR of 10:1 and 13:1, respectively, by utilizing the DTLA2040 Community Benefits Program, which would allow future development of the Property to include a variety of different commercial, residential, and/or light industrial uses at more sustainable building intensities. The more appropriate 10:1 and 13:1 Bonus FAR, which would better utilize the Property and serve the surrounding community, would also be consistent with DTLA 2040 Guiding Principle of accommodating anticipated growth in an inclusive, equitable, sustainable, and healthy manner to support and sustain Downtown's ongoing revitalization.

While the COVID-19 pandemic has impacted every community, the Downtown community has been most impacted with a significant jobs loss and economic slowdown in part due to a severe reduction in visitors and shifts to remote work.¹ Coupled with the City's 6th Cycle SCAG RHNA obligations to create more than 455,000 units between 2021 to 2029, of which 20 percent is anticipated in Downtown, increasing the Bonus FAR from 8:1 to 10:1 and 13:1, respectively, would allow for future flexibility and be more sensitive to the economic realities and the City's dire affordable housing needs. Moreover, a switch from Markets to the Transit Core and Traditional Core land use designations would not change the Property's base 3:1 FAR, which would ensure that any increased development beyond 3:1 FAR would provide much-needed affordable housing, open space, and other public benefits through the DTLA2040 Community Benefits Program.

Lastly, while we recommend the Transit Core designation and corresponding zone for Parcel 1, for the same reasons identified above, Parcel 1 would also be suitable for higher intensity and would justify the Traditional Core designation and corresponding zone's 13:1 Bonus FAR. The Traditional Core's 13:1 Bonus FAR, as compared to the Transit Core's 10:1 Bonus FAR, would also be consistent with the statewide policy of encouraging denser transit-oriented development, which would help reduce greenhouse gas ("GHG") emissions. The Property is located within a transit-rich area, as evidenced by its location within a "Transit Priority Area," which means that the Property is within a one-half mile of a major transit stop as defined by Public Resources Code Section 21064.3. Recognizing that over a third of California's total GHG emissions are transportation-related, the California legislature passed Senate Bill 375 to help reduce the amount people drive and associated GHGs by encouraging denser development near public transit.² As such, increasing the Bonus FAR to 13:1 would promote a more diverse mix of land uses and intensities near regional and employment centers and numerous major transit stops, and thus contribute to the meeting regional GHG reduction goals.

¹ Second Quarter 2020 Downtown LA Market Report, Downtown Center Business Improvement District: <https://ctycms.com/ca-dtla/docs/dtla-market-report-q2-2020.pdf>

² Why Creating and Preserving Affordable Homes Near Transit is a Highly Effective Climate Protection Strategy, California Housing Partnership Corporation: <https://www.transformca.org/sites/default/files/CHPC%20TF%20Affordable%20TOD%20Climate%20Strategy%20BOOKLET%20FORMAT.pdf>

Craig Weber
January 12, 2021
Page 7

For the above-referenced reasons, we respectfully request that the City consider the proposed changes to DTLA 2040. Thank you, and please let me know if you would like to discuss.

Sincerely,

A handwritten signature in black ink, appearing to read 'Edgar Khalatian', with a large, sweeping flourish extending to the right.

Edgar Khalatian
Partner

SHIMODA DESIGN GROUP
ARCHITECTURE

Los Angeles City Planning
Attn: Brittany Arceneaux, City Planner
RE: Remarks to the Draft of the Downtown Community Plan Update
07 December 2020

Dear Brittany,

As an architect who has been building within the City of Los Angeles for 30 years, I would like to express my concerns about the current draft of the Downtown Community Plan Update and the Code recommendations for Recode LA 2040. The website states the following:

“Several years ago, City Planning set out to create a modern and efficient zoning system for Los Angeles. The proposed approach aims to establish a new Zoning Code that is more responsive to the needs of Los Angeles’s neighborhoods, in addition to being easier to use.”

These are noble goals, but the current draft of the code does not show itself to be more responsive to local needs, nor is it easier to use.

The current draft encourages specific distinction between neighborhoods and their current or perceived cultural affiliations. This distinction freezes a location in time and prohibits the future evolution of these areas. This will ultimately result in the perpetuation of a fake architectural representation to gain city approval. The creation of specific development standards in each district will only create confusion and contradiction which will lead to the increased reliance on interpretation from the governing bodies. A greater reliance on interpretation and conversation between differing jurisdictions will slow decisions and make approval times longer. A current example is where balconies and non-flat roof lines are prohibited in the Arts District because it is deemed not reflective of the industrial area. This is nonsensical, and is not reflective of the current building stock in the district. To make something like balconies a discussion topic is a waste of everyone’s time. Balconies in residential projects are common design element and meet a market demand, to put restrictions on such a thing will stop development. Furthermore, prescribing roof lines limits function and architectural expression, and should not be dictated by code.

The current drafts for use and density are too specific and all point to increased costs for development to occur. The Hybrid Industrial District in particular has too many development standards that will ultimately put a cap on interest in creating housing in this area because the minimum unit size, material and physical form requirements will be too expensive to implement. As a result, development will occur in other cities with more favorable and realistic conditions. The draft also points to recommended programmatic uses for the interior of the building. No part of a planning code should have jurisdiction in what happens on the interior organization or design of a structure.

All great cities in the world have evolved through changing economic and cultural demands brought on over the course of time. Planned communities have never resulted in diverse and compelling solutions. A form-based code only creates conditions of conformance and sameness, not diversity and vibrance. Implementing code to “protect” a neighborhood that was borne from a lack of those very limitations is at odds with the march of civilization.

We strongly believe that the current draft needs further study and input from the professional design and development community prior to adoption. The draft analysis of the Downtown, Arts District, Little Tokyo, and Chinatown districts in particular need to be reconsidered and not be defined by transitory cultural associations, a form-based code or by prescribed use requirements that will not evolve over time to reflect the community that it serves.

Los Angeles deserves a code that allows for change and evolution and does not preclude certain economic realities needed for growth.

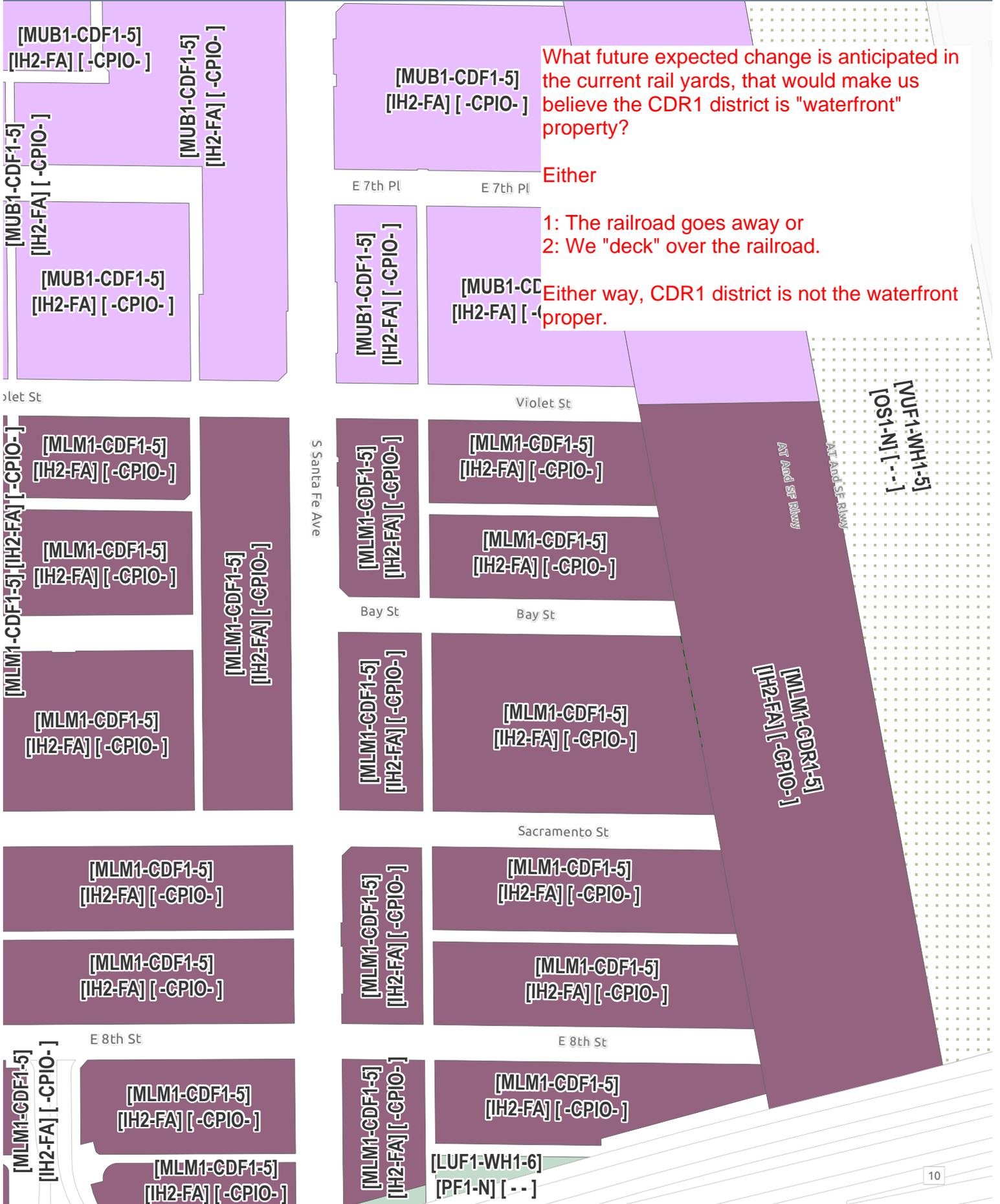
Sincerely,



Joey Shimoda FAIA, FIIDA

cc: Craig Weber craig.weber@lacity.org Shana Michele Murphy Bonstin shana.bonstin@lacity.com
Will Wright will@aialosangeles.org

Attachments: PDF markup: specific comments on the draft code.



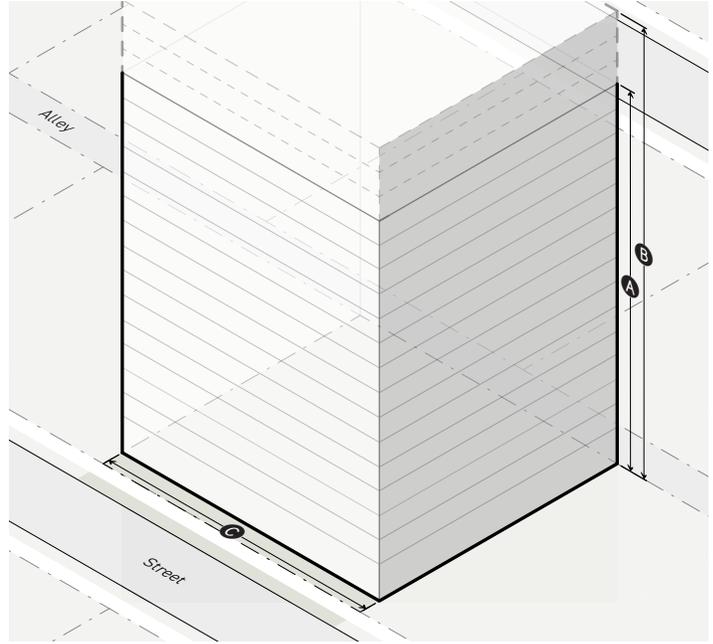
SEC. 2B.11.1. **MEDIUM-LIMITED-MEDIUM 1 (MLM1)**

1. Lot Parameters



LOT SIZE	2C.1.
Lot area (min)	n/a
A Lot width (min)	25'
COVERAGE	2C.2.
B Building coverage (max)	90%
Building setbacks	
C Primary street (min)	see Frontage
Side street (min)	see Frontage
D Side (min)	0'
Rear (min)	0'
E Alley (min)	0'
Special lot line (min)	see Frontage
AMENITY	2C.3.
F Lot amenity space (min)	15%
Residential amenity space (min)	10%

2. Bulk and Mass

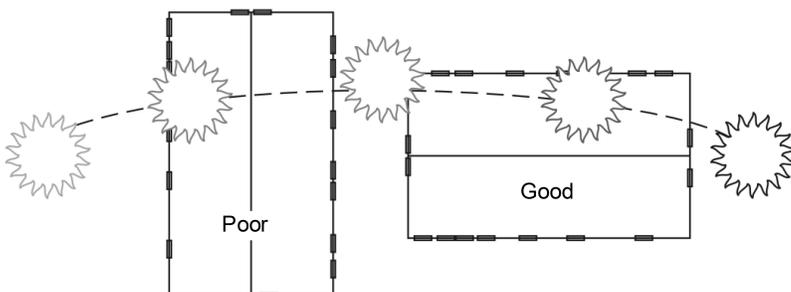


FAR & HEIGHT	2C.4.
Base FAR (max)	1.5
A Base height in stories (max)	15
Bonus FAR (max)	4.5
B Bonus height in stories (max)	18
BUILDING MASS	2C.6.
C Building width (max)	160'
Building break (min)	15'

Any exception to width? What if lot is far wider than 160' ? Current building on our site is 200' long at the street with no breaks or steps.

A typical office building is 200' or more in length, by 120' or so in depth. This is a market driven shape that is desired by most large office tenants.

Most importantly, making buildings wider along the east west direction and shallower north to south improves the natural lighting and environmental performance of the building. We hope that there is room within this draft to accommodate the most fundamental of sustainable design rules.



SEC. 3B.9.3. DAYLIGHT FACTORY (CDF1)

A. Intent

The Industrial 1/Daylight Factory Character Frontage contains metrics and standards aimed at creating infill development that is both contextual and compatible with the historic building stock typical of industrial areas of Los Angeles that were developed in the early 20th century. Utilizing the technology of the day, such as using reinforced concrete for building framing, Daylight Factories were built to accommodate expansive, open floor plans so as to maximize the space available for production. The advancements in building framing meant that exterior walls no longer had to be load-bearing, which allowed for a far greater number of windows to be installed between floors, thus maximizing the amount of light and air that could enter the production floors.

Principally characterized by high levels of transparency and an emphasis on horizontal expression rather than vertical, Daylight Factories also often feature tall floor heights, flat roofs with parapets, and brick and masonry façade materials. Windows are often recessed substantially from the building façade, and large windows are commonly broken up into symmetrical lite patterns.

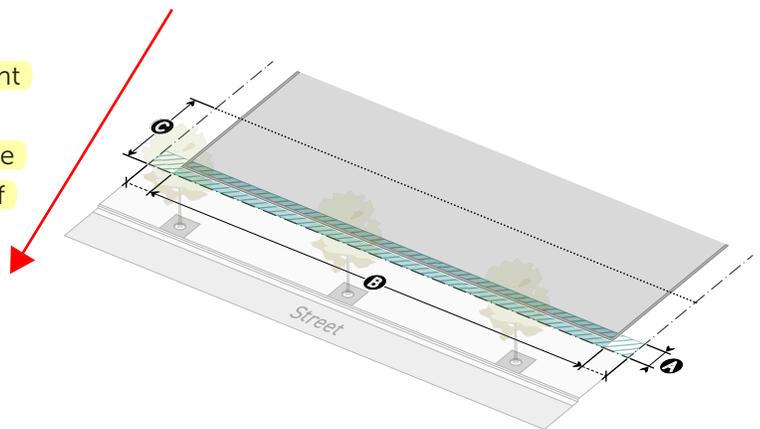
In order to shape and influence new development to be more harmonious with and respectful of proximate historic industrial development, the Daylight Factory Character Frontage incorporates common Daylight Factory design features into the requirements for new development. By requiring new construction to feature similar façade materials, roof forms, floor heights, and window designs to that of what is typical of traditional Daylight Factory design, the Daylight Factory Character Frontage aims to create infill that respects and responds to the surrounding historical industrial building stock.

The regulation of design features is not intended to create buildings that imitate or aim to replicate historic buildings, but rather ensure that new development maintains the general character of early 20th century industrial neighborhoods while still allowing for creativity and modern construction methods.

Why are explicit architectural features being prescribed in this revised code? This is going to create new buildings that all appear more like each other, rather than the existing context, which was built without aesthetic restrictions.

B. Lot

Why is there a strict requirement on vertical bands every 20 to 30 feet?



	Primary	Side
BUILD-TO	Sec. 3D.2.	
Applicable stories (min)	3	3
A Build-to range (min/max)	0'/5'	0'/10'
B Build-to width (min)	90%	70%
Pedestrian amenity modification (max)	30%	30%
PARKING	Sec. 3D.3.	
C Street setback (min)	20'	5'
FRONT YARD LANDSCAPE	Sec. 3D.4.	
Planted area (min)	30%	30%
Privacy Screen allowed:	A1	A1

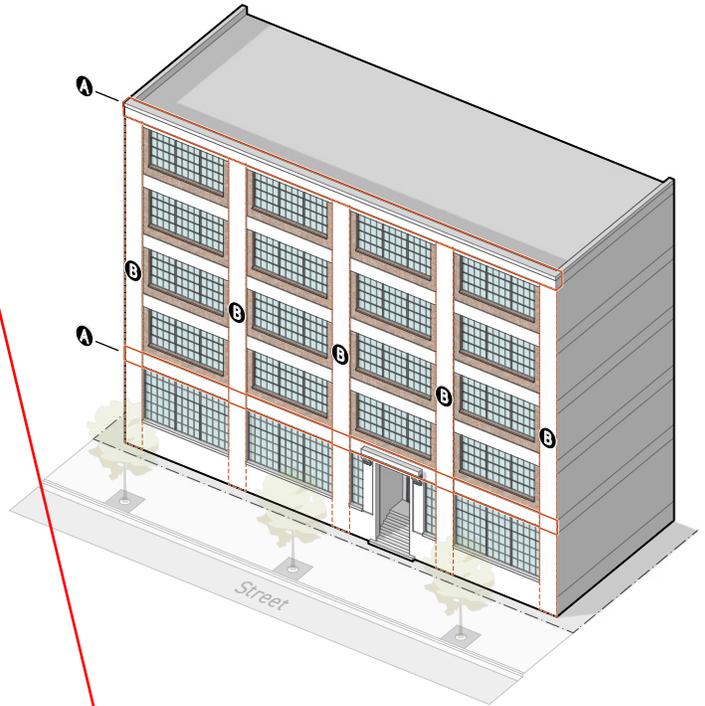
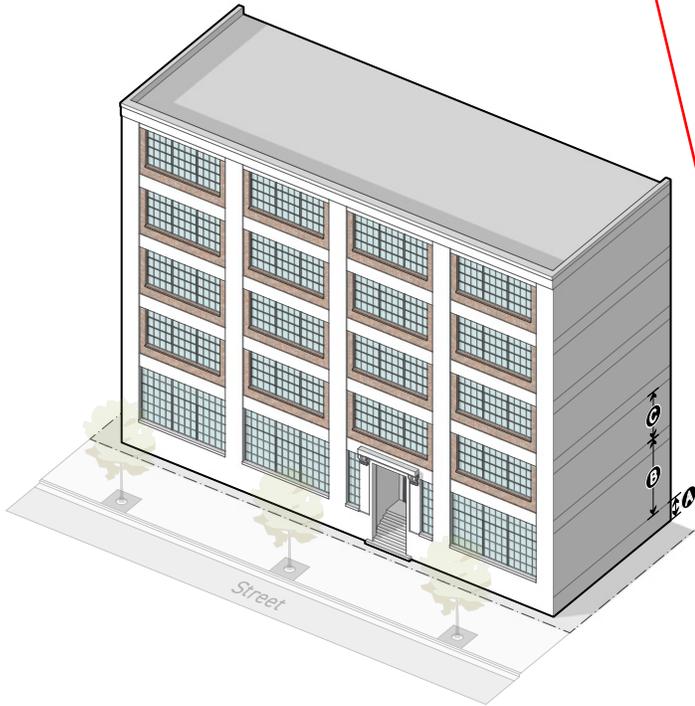
Can the Built-To portion of the facade contain a vehicle access point, serving internal loading areas, parking, drop-off, etc.

There could be limitations of where we can place access driveways, often requiring them to pass through buildings. Existing curb cuts, intersection setbacks, hydrants, utilities, etc.

What is driving the emphasis on vertical bands? This is not a universal facade treatment in the CDF1 district, and forcing this upon all new buildings is going to create a harsh distinction between New vs. Old

C. Stories

D. Facade



	Primary	Side
GROUND FLOOR ELEVATION	Sec. 3D.5.	
A Ground floor elevation (min/max)	-2'/5'	-2'/5'
STORY HEIGHT	Sec. 3D.6.	
B Ground story height (min)	22'	22'
C Upper story height (min)	12'	12'

	Primary	Side
ARTICULATION	Sec. 3D.7.	
A Base-top	Required	Required
B Vertical bands	Required	Required
Spacing (min/max)	20'/30'	20'/30'
Options	<ul style="list-style-type: none"> Projecting band Material band 	
Balcony	Prohibited	Prohibited

What is the purpose of the 22' ground story level minimum? Is the intent to encourage mezzanine levels? For smaller buildings, this becomes a major energy factor as the conditioned volume nearly doubles, plus the cost of building the extra height is considerable.

Why are balconies prohibited? Adjacent older buildings at 1000 S Santa Fe (SoHo House), and 1026 S Santa Fe feature projecting balconies in CDF1.

Balconies are a prominent local vernacular element in this district, featured on many older buildings.

What is interpretation of vertical band? Would a diagonal element count?

30' max spacing of vertical bands will conflict with wider column spacing to accommodate LA parking space requirements, and longer span systems that are efficient and desirable to tenants.



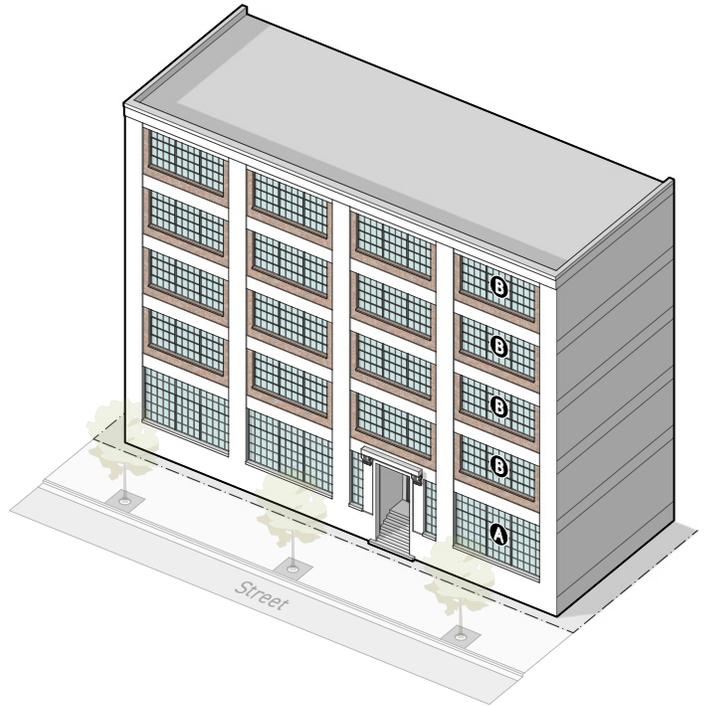
Define symmetrical lite pattern - does this apply to window patterns across entire facade, or makeup of window geometry within individual fenestrations, or both?

What is the negative perception of assymetrical window patterns? The requirement for any type of symmetry will lead to less opportunities for creativity.

One of the problems of the form based code is the buildings are intended to look the same, disguising the true use of the building within.

The request for more similarity in the way facades are designed will ultimately result in less creativity, and can prohibit the interior design and functions from expressing themselves on the exterior. For example, stairways with different fenestration points behind a primary facade.

F. Windows



	Primary	Side
ENTRANCES	Sec. 3D.8.	
A Street-facing entrance	Required	Required
B Entrance spacing (max)	100'	100'
Entry feature	Required	Required
Options	<ul style="list-style-type: none"> • Recessed entry • At-grade entry • Storefront bay 	
C Focal entry feature	1	1

	Primary	Side
TRANSPARENCY	Sec. 3D.9.	
A Ground story (min/max)	50%/80%	50%/80%
Blank wall width (max)	20'	30'
Window recession (min)	9"	9"
Symmetrical lite pattern	Required	Required
Horizontal sliding windows	Prohibited	Prohibited
Vinyl windows	Prohibited	Prohibited
B Upper stories (min/max)	40%/70%	30%/70%
Window recession (min)	6"	6"
Symmetrical lite pattern	Required	Required
Sill	Required	Required
Horizontal sliding windows	Prohibited	Prohibited
Vinyl windows	Prohibited	Prohibited

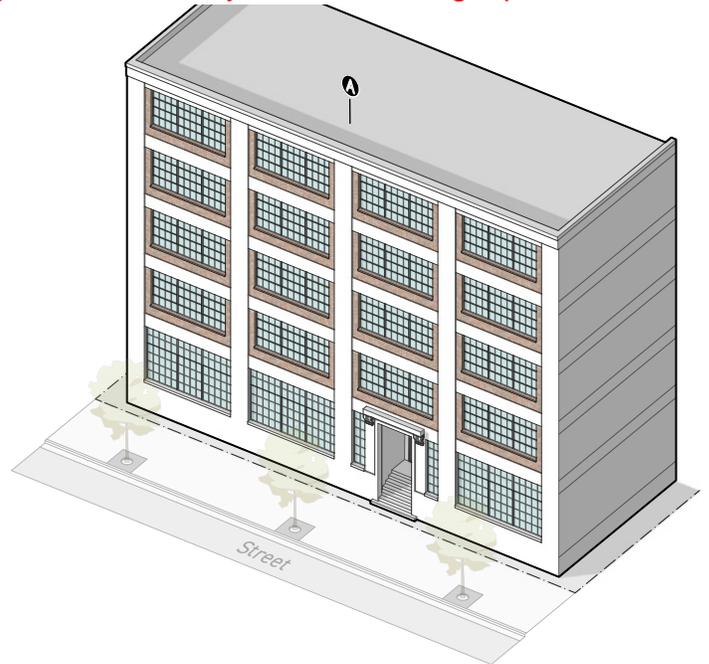
Modern waterproofing and envelope efficiency standards do not prioritize recessed windows. Likely will see the minimum required depth in all new buildings, creating further monotony.

Certain roof shapes provide more functionality and better user experience in the interior.

Other shapes are archetypal; A church, a bowtruss warehouse, a sawtooth factory, a gambrel barn.

Most existing buildings within CDF1 district do not have flat roofs, helping to create a unique visual landscape.

Los Angeles has had a roof restriction on skyscrapers for decades, creating monotonous flat top towers, while other cities get their diversity and identity from their many distinct building tops.



When buildings are more expensive to create at the beginning, they are more expensive to lease. These requirements could be perceived as indifferent to what the market can bear, and to the needs of an economically diverse population.

EXTERIOR MATERIALS		Sec. 3D.10.
A Principal materials (min)		70%
Options	<ul style="list-style-type: none"> • Brick • Solid stone • Concrete • Metal • Wood 	
B Accessory materials (max)		30%
Options	<ul style="list-style-type: none"> • Brick • Solid stone • Concrete • Metal • Wood 	
Number of accessory materials (max)		3

ROOF DESIGN		Sec. 3D.11.
A Roof form (options)		• Flat
Roof materials		n/a

Why are sloped / curved roofs not allowed? It seems absurd that there would be any restrictions on roof form, considering the enormous varieties of roofs that exist.

Limiting all new buildings to flat roofs will have a drastic effect, especially on smaller buildings where the roofline and resulting interior volume makes a huge impact. Roof shapes create variety of interior space.

Why is there an explicit list of approved materials? If the intent is to limit the use of cement plaster "stucco", that could be accomplished with fewer restrictions. It is however a classic southern California material.

Limiting building cladding is limiting imagination. It prioritizes materials not everyone can afford, that requires a higher price point for entry.

For smaller, lower buildings, flat roofs are almost never the first desired shape. Flat roofs limit span, which reduces the quality of the interior space.

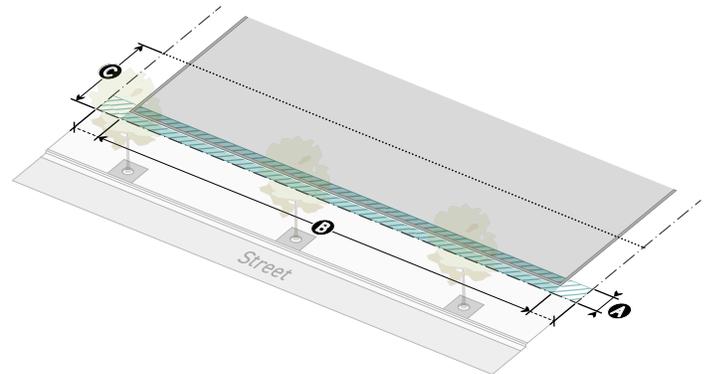
Finally, roof shapes can and should be sculpted to provide ventilation and shading, increasing the buildings efficiency and user comfort.

SEC. 3B.9.4. DAYLIGHT FACTORY / RIVER (CDR1)

A. Intent

[Reserved]

B. Lot



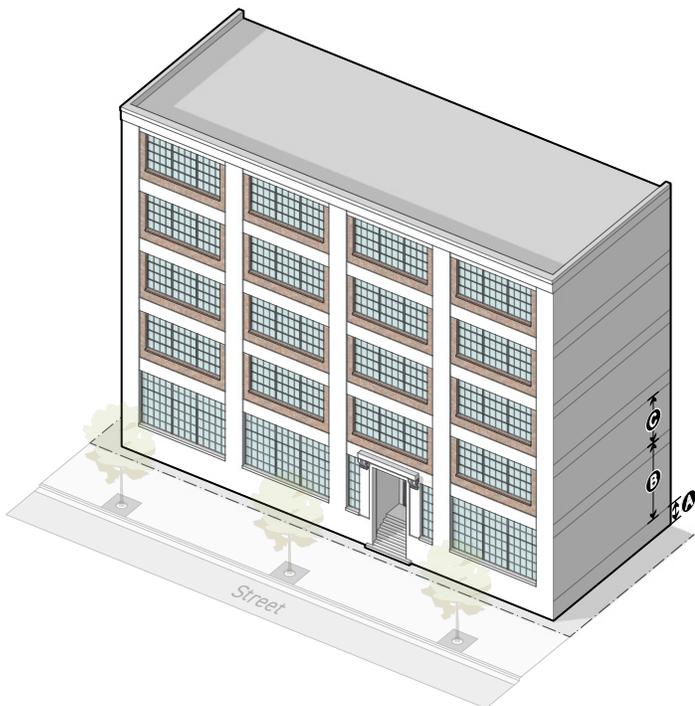
How does this River frontage plan affect a property which is partly in CDR1 but is separated from the river by another property?

Creating a large pedestrian paseo that ends up between two large buildings seems like a misapplication of the intent of this code.

	Primary	Side	River
BUILD-TO	Sec. 3D.2.		
Applicable stories (min)	3	3	3
A Build-to range (min/max)	0'/5'	0'/10'	20'/40'
B Build-to width (min)	90%	70%	70%
Pedestrian amenity modification (max)	30%	30%	40%
PARKING	Sec. 3D.3.		
C Street setback (min)	20'	5'	20'
FRONT YARD LANDSCAPE	Sec. 3D.4.		
Planted area (min)	5%	5%	75%
Privacy Screen allowed:	A1	A1	A3

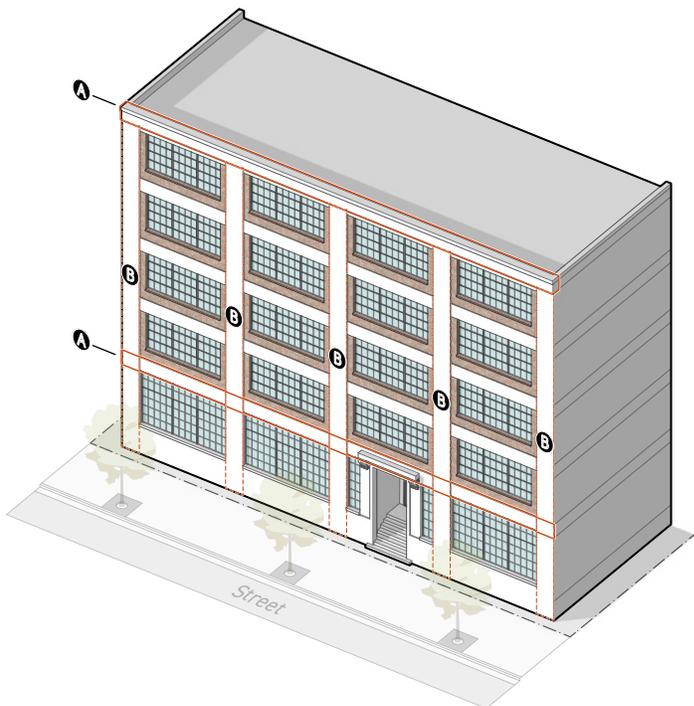
We understand the desire for vegetation near the river, but in an environment where water is a precious resource, prescribing a large percentage of land use that requires irrigation seems irresponsible, and assumes that the land owner can afford to do so.

C. Stories



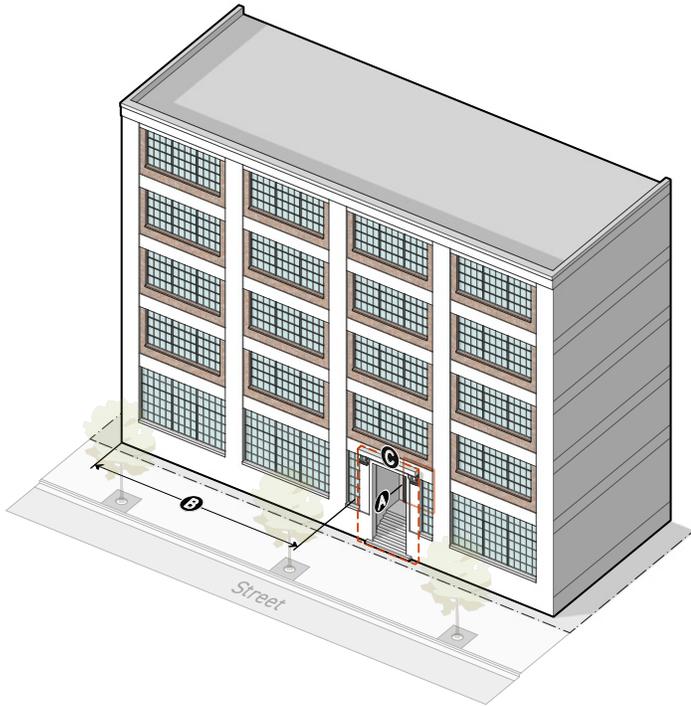
	Primary	Side	River
GROUND FLOOR ELEVATION	Sec. 3D.5.		
A Ground floor elevation (min/max)	-2'/5'	-2'/5'	-2'/5'
STORY HEIGHT	Sec. 3D.6.		
B Ground story height (min)	16'	16'	16'
C Upper story height (min)	12'	12'	12'

D. Facade



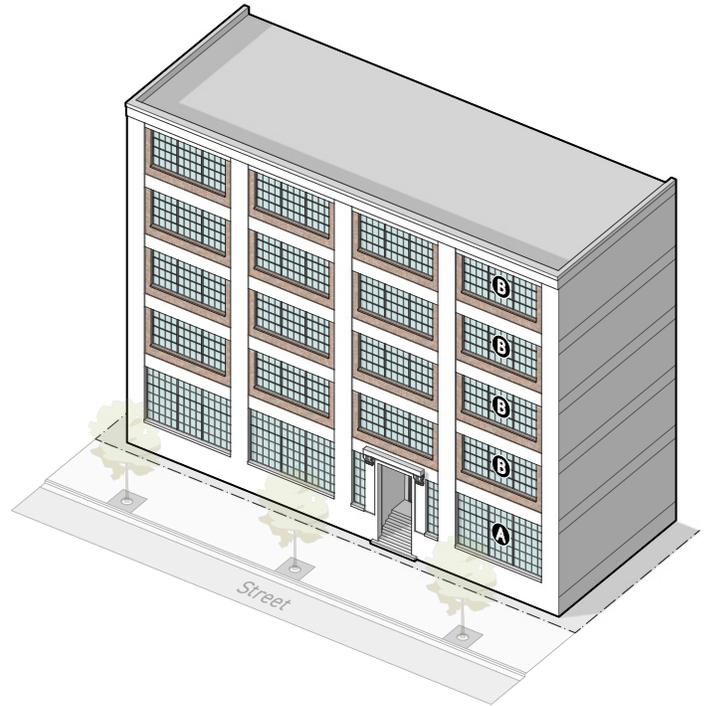
	Primary	Side	River
ARTICULATION	Sec. 3D.7.		
A Base-top	Required	Required	Required
B Vertical bands	Required	Required	Required
Spacing (min/max)	20'/30'	20'/30'	20'/30'
Options	<ul style="list-style-type: none"> • Projecting band • Material band 		
Balcony	Prohibited	Prohibited	Allowed

E. Doors



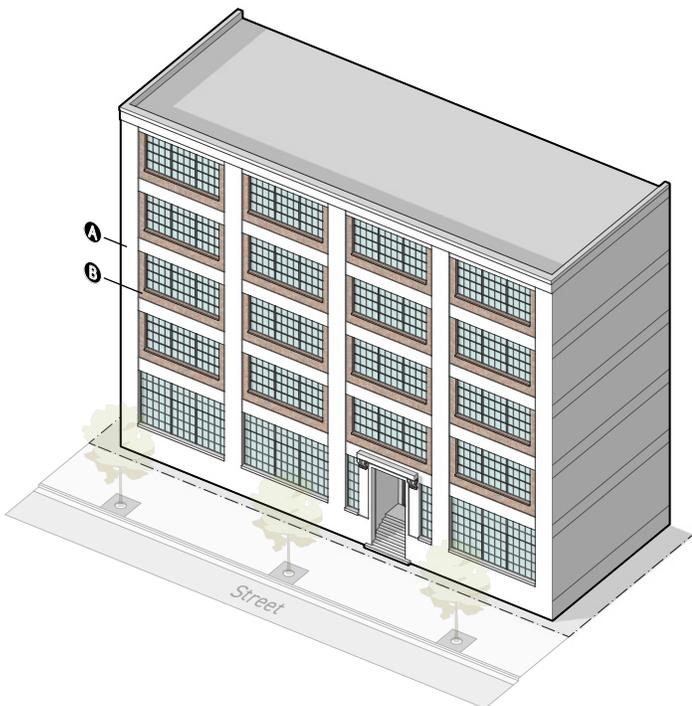
	Primary	Side	River
ENTRANCES	Sec. 3D.8.		
A Street-facing entrance	Required	Required	Required
B Entrance spacing (max)	100'	100'	100'
Entry feature	Required	Required	n/a
Options	<ul style="list-style-type: none"> • Recessed entry • At-grade entry • Storefront bay 		
C Focal entry feature	1	1	n/a

F. Windows

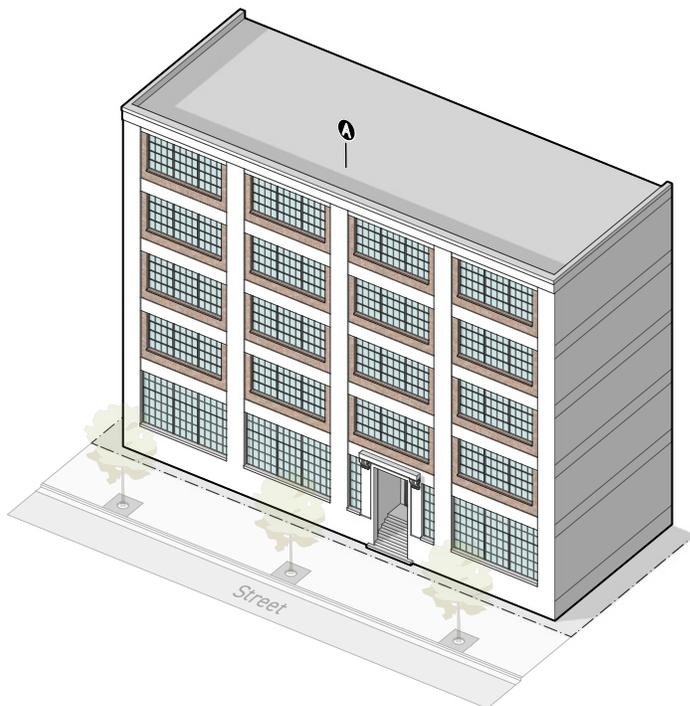


	Primary	Side	River
TRANSPARENCY	Sec. 3D.9.		
A Ground story (min/max)	50%/80%	50%/80%	30%/80%
Blank wall width (max)	20'	30'	30'
Window recession (min)	9"	9"	9"
Symmetrical lite pattern	Required	Required	Required
Horizontal sliding windows	Prohibited	Prohibited	Prohibited
Vinyl windows	Prohibited	Prohibited	Prohibited
B Upper stories (min/max)	40%/70%	30%/70%	30%/70%
Window recession (min)	6"	6"	6"
Symmetrical lite pattern	Required	Required	Required
Sill	Required	Required	Required
Horizontal sliding windows	Prohibited	Prohibited	Prohibited
Vinyl windows	Prohibited	Prohibited	Prohibited

G. Cladding



H. Roof



EXTERIOR MATERIALS		Sec. 3D.10.
A Principal materials (min)		70%
Options		<ul style="list-style-type: none"> • Brick • Solid stone • Concrete • Metal • Wood
B Accessory materials (max)		30%
Options		<ul style="list-style-type: none"> • Brick • Solid stone • Concrete • Metal • Wood
Number of accessory materials (max)		3

ROOF DESIGN		Sec. 3D.11.
A Roof form (options)		• Flat
Roof materials		n/a

DIV. 4B.5. **DEVELOPMENT STANDARD DISTRICT 5**

SEC. 4B.5.1. **INTENT**

This Development Standards District supports areas where walking, biking, and public transit are the prioritized modes of transportation.

Pedestrian connections increase porosity in long blocks facilitating pedestrian movement and contributing to a pedestrian-friendly environment. No minimum parking is required, and when it is provided above-grade, it must meet high standards of design. On-site signs are sized and located to support a pedestrian-oriented public realm.

SEC. 4B.5.2. **STANDARDS**

A. Access		Div. 4C.1.	
PEDESTRIAN ACCESS		Sec. 4C.1.1.	
Pedestrian access package		1	
PEDESTRIAN CONNECTION		Sec. 4C.1.2.	
Pedestrian connections		Required every 350'	
B. Parking		Div. 4C.2.	
AUTOMOBILE PARKING		Sec. 4C.2.2.	
Required parking ratios		Parking Set E	
Additional parking for commercial change of use		n/a	
PARKING AREA DESIGN		Sec. 4C.2.4.	
		Primary St.	Side St.
Parking Garage			
Ground Story		Wrapped	Wrapped
Upper Stories		Adaptable	Adaptable
Integrated Parking			
Ground Story		Wrapped	Wrapped
Upper Stories		Wrapped	Adaptable
C. Signs		Div. 4C.6.	
Sign Package		2	

See Part 4C (General Development Standards) for additional development standards that apply.

DIV. 5B.5. INDUSTRIAL-MIXED USE DISTRICTS

Industrial-Mixed Use Districts accommodate a mixture of light industrial, office, and research and development activity, with limited residential uses and other compatible uses.

SEC. 5B.5.1. TABLE OF USES

	IX1 5B.6.2.	IX2 5B.6.3.	IH1 5B.6.4.	IH2 5B.6.5.	
RESIDENTIAL USES					
Household Living	LD	--	LD	LD	
Apartment Hotel	--	--	--	--	
Boarding or Apartment House	--	--	--	--	
Community Care Facility, Licensed; As Listed Below:					
6 or fewer	--	--	--	--	
7 or more	--	--	--	--	
Dormitory Room	--	--	--	--	
Fraternity/Sorority Housing	--	--	--	--	
Homeless Shelter	LG	LG	LG	LG	5C.2.1.
Live Work, Except as Listed Below	--	--	LD	LD	
Joint Living and Work Quarters	--	LG	LG	LG	5C.2.2.
Mobilehome Park	--	--	--	--	
Senior Living, As Listed Below:					
Eldercare Facility	--	--	--	--	
Alzheimer's and Dementia Care Housing	--	--	--	--	
Assisted Living	--	--	--	--	
Senior Independent Living	--	--	--	--	
Skilled Nursing Home	--	--	--	--	
Substance Abuse Facility, Licensed, As Listed Below:					
6 or Fewer	--	--	--	--	
7 or More	--	--	--	--	
PUBLIC AND INSTITUTIONAL USES					
Civic, Except as Listed Below:	P	P	P	P	
Community Center	P	P	P	P	
Convention Center	--	--	--	--	
Ground Passenger Terminal	P	P	P	P	
Correctional or Penal Institution	C3	C3	C3	C3	
Counseling and Referral Facility	P	P	P	P	
Nature Conservation Area	P	P	P	P	
Parking	P	P	P	P	
Park and Open Space	P	P	P	P	

KEY: P=Permitted Use; LD=Limited by Use District; LG=Limited by General Use Standard;
 C1=Approval by Zoning Administrator; C2=Public Hearing by Zoning Administrator;
 C3=Review by City Planning Commission; *Use may be limited by adjacent Use District; --=Use Not Permitted

	IX1 5B.6.2.	IX2 5B.6.3.	IH1 5B.6.4.	IH2 5B.6.5.	
House of Worship	C2	C2	C2	C2	
Public Safety Facility	P	P	P	P	
School, As Listed Below:					
School, K-12	C3	C3	C3	C3	
School, Postsecondary	C3	C3	C3	C3	
Shoreline Project	C3	C3	C3	C3	
Utilities, As Listed Below:	LG	LG	LG	LG	5C.3.3.
Solar Panel Energy Generating Facility	LG	LG	LG	LG	5C.3.4.
GENERAL COMMERCIAL USES					
Adult Entertainment Business	--	LG	LD	LD	5C.4.1.
Alcohol Sales, As Listed Below:					
On-Site Sale	C2	C2	C2	C2	
Off-Site Sale	--	C2	C2	C2	
Animal Care, Sales and Services, Except as Listed Below:	P	P	LG	LG	5C.4.6.
Kennel	LD	LD	--	--	
Veterinary Hospital	LD	LD	LD	LD	
Cemetery, Except as Listed Below:	LG	LG	LG	LG	5C.4.5.
Funeral and Related Services	C2	C2	C2	C2	
Day Care Facility	C2	C2	C2	C2	
Eating and Drinking Establishment, Except as Listed Below:	P	P	P	P	
Drive-Through Eating and Drinking Establishment	--	--	--	--	
Entertainment Venue, As Listed Below:					
Auditorium	P	P	P	P	
Banquet Hall	--	--	P	P	
Dance Hall	C2	C2	C2	P	
Live Entertainment (Cafe/Shows, Karaoke)	C2	C2	C2	C2	
Sports Arena and Stadium	C3	C3	C3	C3	
Theater	P	P	P	P	
Financial Services, Except as Listed Below	P	P	P	P	
Alternative Financial Services	--	--	--	--	
Hotel, Except as Listed Below:	P	--	C2	C2	
Motel	P	--	C2	C2	
Transient Occupancy Residential	--	--	C2	C2	
Instructional Services	P	P	P	P	
Medical Facility, Except as Listed Below:	P	P	P	P	
Ambulance Services	P	P	P	P	
Hospice	--	--	--	--	
Hospital	C3	C3	C3	C3	5C.9.8.

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	IX1 5B.6.2.	IX2 5B.6.3.	IH1 5B.6.4.	IH2 5B.6.5.	
Office, Except as Listed Below:	P	P	P	P	
Creative Media Office	P	P	P	P	
Personal Services, Except as Listed Below:	P	P	P	P	
Massage Therapy	P	P	P	P	
Private Club	C2	C2	C2	C2	
Recreation, Indoor; Except as Listed Below:	P	P	P	P	
Gym	P	P	P	P	
Recreation, Outdoor; Except as Listed Below:	P	P	P	P	
Golf Course	--	--	--	--	
Retail Sales, Except as Listed Below:	P	P	P	P	
Certified Farmers' Market	LG	LG	LG	LG	5C.4.4.
Food and Beverage Store	P	P	P	P	
Gun Sales	C2	C2	C2	C2	
Smoke and Vape Shop	--	LD	LD	LD	
Swap Meet	P	P	P	P	
HEAVY COMMERCIAL USES					
Car Wash	--	LG	--	--	5C.4.4.
Fueling Station	--	LG	--	--	5C.5.2.
Vehicle Repair, As Listed Below:					
Vehicle Repair, Light	LG	LG	LG	LG	5C.5.4.
Vehicle Repair, Heavy	--	--	--	--	
Vehicle Sales and Rental, As Listed Below:					
Used Vehicle Sales, Light	--	LG	LG	LG	5C.5.3.
Vehicle Sales and Rental, Light	--	LG	LG	LG	5C.5.6.
Vehicle Sales and Rental, Heavy	--	--	--	--	
Vehicle Storage, As Listed Below:					
Official Police Garage	LG	LG	LG	LG	5C.5.8.
Vehicle Storage, Light	--	--	--	--	
Vehicle Storage, Heavy	--	--	--	--	
LIGHT INDUSTRIAL USES					
Computer and Electronic Product Assembly	P	P	P	P	
Food and Drink Manufacturing, Except as Listed Below:	P	P	P	P	
Alcoholic Beverage Manufacturing	P	P	P	P	
Furniture and Related Products Manufacturing	P	P	P	P	
General Light Manufacturing	P	P	P	P	
Maintenance and Repair Services	P	P	P	P	
Research and Development	P	P	P	P	
Self-Service Storage	LD	LD	--	--	

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	IX1 5B.6.2.	IX2 5B.6.3.	IH1 5B.6.4.	IH2 5B.6.5.
Soundstages and Backlots	P	P	P	P
Textile and Apparel Manufacturing	P	P	P	P
Wholesale Trade and Warehousing	P	P	P	P
HEAVY INDUSTRIAL USES				
Airport	--	--	--	--
Animal Products Processing	--	--	--	--
Chemical Product Manufacturing, Except as Listed Below:	--	--	--	--
Cosmetic, Pharmaceutical Drug, and Soap Manufacturing	P	P	P	P
Freight Terminal	--	--	--	--
General Storage, Except as Listed Below:	--	--	--	--
Cargo Container Storage Yard	--	--	--	--
Junk Yard Facility, Except as Listed Below:	--	--	--	--
Auto Dismantling	--	--	--	--
Scrap Metal Yard	--	--	--	--
Machinery and Fabricated Metal Manufacturing	--	--	--	--
Nonmetallic Mineral Product Manufacturing	--	--	--	--
Petroleum and Coal Product Manufacturing	--	--	--	--
Plastic and Rubber Product Manufacturing	--	--	--	--
Primary Metal Manufacturing	--	--	--	--
Railway Facility	--	--	--	--
Resource Extraction, Except as Listed Below:	--	--	--	--
Oil and Gas Extraction	--	--	--	--
Solid Waste Facility, Except as Listed Below:	--	--	--	--
Green Waste and Wood Waste Facility	--	--	--	--
Hazardous Waste Facility	--	--	--	--
Solid Waste Alternative Technology Processing Facility	--	--	--	--
Recycling Centers and Facilities, As Listed Below:				
Recycling Collection or Buyback Center	C3	C3	--	--
Recycling Materials Sorting Facility	--	--	--	--
Recycling Materials Processing Facility	--	--	--	--
Wood and Paper Manufacturing	--	--	--	--
AGRICULTURAL USES				
Animal Keeping, Wild	--	--	--	--
Animal Farming, Except as Listed Below	--	--	--	--
Equinekeeping, Commercial	--	--	--	--
Equinekeeping, Non-commercial	--	--	--	--
Livestock Keeping	--	--	--	--
Farming (Plant Cultivation), Except as Listed Below:	P	P	P	P
Truck Gardening	P	P	P	P

KEY: P=Permitted Use; LD=Limited by Use District; LG=Limited by General Use Standard;
 C1=Approval by Zoning Administrator; C2=Public Hearing by Zoning Administrator;
 C3=Review by City Planning Commission; *Use may be limited by adjacent Use District; --=Use Not Permitted

E. Open Storage Limitations

Open storage of materials and equipment, including used materials and equipment, shall be in compliance with 4C.3.5.C.2.b. (Open Storage Screening Type B).

SEC. 5B.5.5. INDUSTRIAL-MIXED HYBRID 2 (IH2)

A. Intent

The IH2 District supports office and commercial uses, as well as research and development, wholesale, and light industrial uses. The Use District allows for a limited amount of Live/Work units. The District is intended to promote productive industries and entrepreneurial activities.

B. Use District Standards

1. All new structures shall be built entirely with Type I, II, or IV construction, as defined in the Los Angeles Building Code and verified by the Los Angeles Department of Building and Safety.

C. Use Limitations

1. Household Living

- a. Residential Dwelling Units and Guest Rooms are permitted as part of a Qualified Permanent Supportive Housing Project which is eligible for the Qualified Permanent Supportive Housing Incentive Program, as defined in Section 9C.5.1
- b. New construction is not permitted, unless the use is part of a Qualified Permanent Supportive Housing Project as described in Paragraph (a).

2. Live/Work (for new construction)

- a. The Minimum Average Unit Size of all Live/Work Units contained on a Lot shall be no less than 1,000 square feet.
- b. Between 48 and 50 percent of each Unit shall be designated as workspace area. The workspace area shall be no smaller than 150 SF and measure not less than 15 feet in at least one dimension and no less than 10 feet in any dimension. The required workspace area for each unit shall be clearly demarcated on approved building plans.
- c. The workspace area shall be assigned a non-residential use permitted in the Office Use Group, or the Agricultural, Heavy Commercial or Light Industrial Use Categories.
- d. Excluding area used for bathrooms and storage, at least 70 percent of the floor area of each Live/Work unit shall be open with no fixed interior separation wall
- e. Inclusion of other uses. Live/work units shall not be permitted unless a minimum amount of non-residential uses are included within a lot such that:
 - i. The gross floor area of these uses equates to a minimum amount of at least 150% of the lot area and;

- ii. Such space be assigned to a use permitted in the Office Use Group, or the Agricultural, Heavy Commercial, or Light Industrial Use Categories.
- f. The entire structure shall have a 50-foot minimum distance from any uses within the Heavy Industrial Use Category.

3. Adult Entertainment Business

- a. A Sexual Encounter Establishment is not permitted.
- b. The use shall comply with the use standards in Sec. 5C.4.1. (Adult Entertainment Business).

4. Veterinary Hospital

- a. Must be within a fully enclosed building.
- b. No outside keeping of animals permitted.

5. Smoke and Vape Shop

- a. This use must be within a fully enclosed building.

D. Conditional Uses

The following uses require a Conditional Use Permit, pursuant to Sec. 13.4.1. (Conditional Use Permit, Class 1), Sec. 13.4.2. (Conditional Use Permit, Class 2) and Sec. 13.4.3. (Conditional Use Permit, Class 3), as specified by the applicable Use Table.

1. Correctional or Penal Institution
2. House of Worship
3. Schools, K-12
4. School, Postsecondary
5. Shoreline Project
6. Alcohol Sales, Off-Site Consumption.
 - a. The use shall also comply with the use standards in Sec. 5C.4.2. (Alcohol Sales, Off-Site Consumption).
7. Alcohol Sales, On-Site Consumption.
 - a. The use shall also comply with the use standards in Sec. 5C.4.3. (Alcohol Sales, On-Site Consumption).
8. Funeral and Related Services
9. Day Care Facility

- a. The use must be providing care primarily for children of employees of businesses/ industries in the vicinity.

10. Dance Hall

11. Live Entertainment

12. Sports Arena and Stadium

13. Hotel

- a. This use is limited to 75 Guest Rooms.

14. Motel

- a. This use is limited to 75 Guest Rooms.

15. Transient Occupancy Residential.

- a. Permitted only in new construction.
- b. New construction of this use is limited to 75 Guest Rooms or Dwelling Units.
- c. Conversion of Residential Units to this use is prohibited.

16. Hospital

17. Private Club

18. Gun Sales.

- a. Supplemental Findings. In addition to the findings otherwise required, the Zoning Administrator shall also consider whether the proposed use will result in an over-concentration of this use in the area, and the number of firearms available for sale at the site.

E. Open Storage Limitations

Open storage of materials and equipment, including used materials and equipment, shall be in compliance with 4C.3.5.C.2.b. (Open Storage Screening Type B).



Jordan Hallman <jordan.hallman@lacity.org>

Please support this plan

1 message

Faizah Malik <fmalik@everyactioncustom.com>

Wed, Dec 16, 2020 at 2:43 PM

Reply-To: fmalik@publiccounsel.org

To: downtownplan@lacity.org

Dear Downtown Plan,

Thank you for the opportunity to comment on the forthcoming update to the Downtown Community Plan. I'm writing on behalf of Abundant Housing LA, a pro-housing education and advocacy organization working to help solve Southern California's housing crisis. AHLA supports efforts to promote equity and reform land use regulations and zoning codes, and expand housing production at all levels of income.

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Modify the requirement that residential buildings in Subarea A.3 that use the density bonus program must make at least 30% of the building's units two bedrooms or larger. Encourage production of affordable family units by introducing a "super-density bonus" tier throughout Downtown, for projects that make at least 30% of the building's two bedrooms or larger.

Introduce a parking maximum on new construction, and introduce a per-space fee on all existing and new parking lots and garages in Downtown.

Amend the Industrial-Mixed Use 2 (IX2) and Hybrid Industrial 2 (HI2) zones to allow all residential housing types. Do not restrict housing options in these areas to live-work units only.

A Downtown Community Plan update that incorporates these policies will help advance our common goals of housing affordability, socioeconomic equity, economic prosperity, and environmental sustainability. Thank you for your consideration, and for your hard work on this important project.

Personally sent by Faizah Malik using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,

Faizah Malik

00 Los Angeles, CA 90025

fmalik@publiccounsel.org



Jordan Hallman <jordan.hallman@lacity.org>

Please support this plan

1 message

JAKE MALOTT <JAKE@everyactioncustom.com>

Mon, Dec 14, 2020 at 2:18 PM

Reply-To: JAKE@wsdci.com

To: downtownplan@lacity.org

Dear Downtown Plan,

Thank you for the opportunity to comment on the forthcoming update to the Downtown Community Plan. I'm writing on behalf of Abundant Housing LA, a pro-housing education and advocacy organization working to help solve Southern California's housing crisis. AHLA supports efforts to promote equity and reform land use regulations and zoning codes, and expand housing production at all levels of income.

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Personally sent by JAKE MALOTT using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,

JAKE MALOTT

7190 W Sunset Blvd # 507 Los Angeles, CA 90046-4415

JAKE@WSDCI.COM



Jordan Hallman <jordan.hallman@lacity.org>

Please support this plan

1 message

Aida Marina <amice@everyactioncustom.com>

Mon, Dec 14, 2020 at 2:14 PM

Reply-To: amice@aol.com

To: downtownplan@lacity.org

Dear Downtown Plan,

Thank you for the opportunity to comment on the forthcoming update to the Downtown Community Plan. I'm writing on behalf of Abundant Housing LA, a pro-housing education and advocacy organization working to help solve Southern California's housing crisis. AHLA supports efforts to promote equity and reform land use regulations and zoning codes, and expand housing production at all levels of income.

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Personally sent by Aida Marina using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,

Miss Aida Marina

710 Arroyo Dr South Pasadena, CA 91030-2370

amice@aol.com



Jordan Hallman <jordan.hallman@lacity.org>

Please support this plan

1 message

Matthew Dixon <northendmatt@everyactioncustom.com>

Tue, Dec 15, 2020 at 12:40 PM

Reply-To: northendmatt@gmail.com

To: downtownplan@lacity.org

Dear Downtown Plan,

Thank you for the opportunity to comment on the forthcoming update to the Downtown Community Plan. I'm writing on behalf of Abundant Housing LA, a pro-housing education and advocacy organization working to help solve Southern California's housing crisis. AHLA supports efforts to promote equity and reform land use regulations and zoning codes, and expand housing production at all levels of income.

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Personally sent by Matthew Dixon using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,

Matthew Dixon

859 E Promenade Unit B Azusa, CA 91702-6801

northendmatt@gmail.com



Jordan Hallman <jordan.hallman@lacity.org>

Please support this plan

1 message

Andy May <andymay@everyactioncustom.com>

Tue, Dec 15, 2020 at 10:13 AM

Reply-To: andymay@yahoo.com

To: downtownplan@lacity.org

Dear Downtown Plan,

Thank you for the opportunity to comment on the forthcoming update to the Downtown Community Plan. I'm writing on behalf of Abundant Housing LA, a pro-housing education and advocacy organization working to help solve Southern California's housing crisis. AHLA supports efforts to promote equity and reform land use regulations and zoning codes, and expand housing production at all levels of income.

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Personally sent by Andy May using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,

Andy May

1901 N New Hampshire Ave Los Angeles, CA 90027-1818

andymay@yahoo.com



Jordan Hallman <jordan.hallman@lacity.org>

Please support this plan

1 message

Mariana Mellor <mcns.777@everyactioncustom.com>

Mon, Dec 14, 2020 at 2:14 PM

Reply-To: mcns.777@gmail.com

To: downtownplan@lacity.org

Dear Downtown Plan,

Thank you for the opportunity to comment on the forthcoming update to the Downtown Community Plan. I'm writing on behalf of Abundant Housing LA, a pro-housing education and advocacy organization working to help solve Southern California's housing crisis. AHLA supports efforts to promote equity and reform land use regulations and zoning codes, and expand housing production at all levels of income.

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Personally sent by Mariana Mellor using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,

Mariana Mellor

768 Tuolumne Ave Thousand Oaks, CA 91360-4250

mcns.777@gmail.com



Jordan Hallman <jordan.hallman@lacity.org>

Please support this plan

1 message

Anna Mercado <anna.mercado0320@everyactioncustom.com>

Tue, Jan 12, 2021 at 8:37 AM

Reply-To: anna.mercado0320@yahoo.com

To: downtownplan@lacity.org

Dear Downtown Plan,

Thank you for the opportunity to comment on the forthcoming update to the Downtown Community Plan. I'm writing on behalf of Abundant Housing LA, a pro-housing education and advocacy organization working to help solve Southern California's housing crisis. AHLA supports efforts to promote equity and reform land use regulations and zoning codes, and expand housing production at all levels of income.

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Personally sent by Anna Mercado using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,

Anna Mercado

4743 Druid St Los Angeles, CA 90032-3203

anna.mercado0320@yahoo.com



Jordan Hallman <jordan.hallman@lacity.org>

Please support this plan

1 message

Anna Mercado <anna.mercado0320@everyactioncustom.com>

Tue, Jan 12, 2021 at 8:37 AM

Reply-To: anna.mercado0320@yahoo.com

To: downtownplan@lacity.org

Dear Downtown Plan,

Thank you for the opportunity to comment on the forthcoming update to the Downtown Community Plan. I'm writing on behalf of Abundant Housing LA, a pro-housing education and advocacy organization working to help solve Southern California's housing crisis. AHLA supports efforts to promote equity and reform land use regulations and zoning codes, and expand housing production at all levels of income.

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Personally sent by Anna Mercado using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,

Anna Mercado

4743 Druid St Los Angeles, CA 90032-3203

anna.mercado0320@yahoo.com



Jordan Hallman <jordan.hallman@lacity.org>

Please support this plan

1 message

Paras Nanavati <paras@everyactioncustom.com>

Tue, Dec 15, 2020 at 12:27 PM

Reply-To: paras@pncstudios.com

To: downtownplan@lacity.org

Dear Downtown Plan,

Thank you for the opportunity to comment on the forthcoming update to the Downtown Community Plan. I'm writing on behalf of Abundant Housing LA, a pro-housing education and advocacy organization working to help solve Southern California's housing crisis. AHLA supports efforts to promote equity and reform land use regulations and zoning codes, and expand housing production at all levels of income.

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Personally sent by Paras Nanavati using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,

Mr. Paras Nanavati

2285 Cove Ave Los Angeles, CA 90039-3664

paras@pncstudios.com



Jordan Hallman <jordan.hallman@lacity.org>

Please support this plan

1 message

Cyndy Nguyen <cyndytherealtor@everyactioncustom.com>

Mon, Dec 14, 2020 at 2:28 PM

Reply-To: cyndytherealtor@gmail.com

To: downtownplan@lacity.org

Dear Downtown Plan,

Thank you for the opportunity to comment on the forthcoming update to the Downtown Community Plan. I'm writing on behalf of Abundant Housing LA, a pro-housing education and advocacy organization working to help solve Southern California's housing crisis. AHLA supports efforts to promote equity and reform land use regulations and zoning codes, and expand housing production at all levels of income.

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Modify the requirement that residential buildings in Subarea A.3 that use the density bonus program must make at least 30% of the building's units two bedrooms or larger. Encourage production of affordable family units by introducing a "super-density bonus" tier throughout Downtown, for projects that make at least 30% of the building's two bedrooms or larger.

Introduce a parking maximum on new construction, and introduce a per-space fee on all existing and new parking lots and garages in Downtown.

Amend the Industrial-Mixed Use 2 (IX2) and Hybrid Industrial 2 (HI2) zones to allow all residential housing types. Do not restrict housing options in these areas to live-work units only.

A Downtown Community Plan update that incorporates these policies will help advance our common goals of housing affordability, socioeconomic equity, economic prosperity, and environmental sustainability. Thank you for your consideration, and for your hard work on this important project.

Personally sent by Cyndy Nguyen using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,

Cyndy Nguyen

2150 Hillhurst Ave Los Angeles, CA 90027-2012

cyndytherealtor@gmail.com



Jordan Hallman <jordan.hallman@lacity.org>

Please support this plan

1 message

Stan Oklobdzija <stan916@everyactioncustom.com>

Mon, Dec 14, 2020 at 2:15 PM

Reply-To: stan916@gmail.com

To: downtownplan@lacity.org

Dear Downtown Plan,

Thank you for the opportunity to comment on the forthcoming update to the Downtown Community Plan. I'm writing on behalf of Abundant Housing LA, a pro-housing education and advocacy organization working to help solve Southern California's housing crisis. AHLA supports efforts to promote equity and reform land use regulations and zoning codes, and expand housing production at all levels of income.

As you know, the City of Los Angeles is suffering from a severe housing crisis. Exclusionary zoning, systemic racism, and longstanding constraints on denser housing production, combined with a lack of sufficient funding for affordable housing production and preservation, have led to a massive housing shortage. This has made Los Angeles one of the nation's most unaffordable housing markets. High rents and a lack of new housing opportunities have caused greater financial pressure on families, longer commutes, increasing carbon emissions, more displacement of historically disadvantaged communities, high homelessness, and reduced access to economic and educational opportunity. This has also reinforced longstanding patterns of income and racial segregation in our city's neighborhoods.

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Personally sent by Stan Oklobdzija using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,

Dr Stan Oklobdzija

755 S Spring St Los Angeles, CA 90014-2973

stan916@gmail.com



Jordan Hallman <jordan.hallman@lacity.org>

Please support this plan

1 message

Michael Pemberton <mikepemby630@everyactioncustom.com>

Tue, Dec 15, 2020 at 10:40 AM

Reply-To: mikepemby630@gmail.com

To: downtownplan@lacity.org

Dear Downtown Plan,

Thank you for the opportunity to comment on the forthcoming update to the Downtown Community Plan. I'm writing on behalf of Abundant Housing LA, a pro-housing education and advocacy organization working to help solve Southern California's housing crisis. AHLA supports efforts to promote equity and reform land use regulations and zoning codes, and expand housing production at all levels of income.

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Personally sent by Michael Pemberton using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,

Michael Pemberton

0 Lancaster, CA 93534

mikepemby630@gmail.com



Jordan Hallman <jordan.hallman@lacity.org>

Please support this plan

1 message

Heather Pentecost <pentecost.heather@everyactioncustom.com>

Fri, Jan 8, 2021 at 1:37 PM

Reply-To: pentecost.heather@gmail.com

To: downtownplan@lacity.org

Dear Downtown Plan,

Thank you for the opportunity to comment on the forthcoming update to the Downtown Community Plan. I'm writing on behalf of Abundant Housing LA, a pro-housing education and advocacy organization working to help solve Southern California's housing crisis. AHLA supports efforts to promote equity and reform land use regulations and zoning codes, and expand housing production at all levels of income.

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Personally sent by Heather Pentecost using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,

Heather Pentecost

2033 E 3rd St Long Beach, CA 90814-2133

pentecost.heather@gmail.com



Jordan Hallman <jordan.hallman@lacity.org>

Please support this plan

1 message

Grayson Peters <graysonapeters@everyactioncustom.com>

Mon, Dec 14, 2020 at 2:15 PM

Reply-To: graysonapeters@gmail.com

To: downtownplan@lacity.org

Dear Downtown Plan,

Thank you for the opportunity to comment on the forthcoming update to the Downtown Community Plan. I'm writing on behalf of Abundant Housing LA, a pro-housing education and advocacy organization working to help solve Southern California's housing crisis. AHLA supports efforts to promote equity and reform land use regulations and zoning codes, and expand housing production at all levels of income.

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Personally sent by Grayson Peters using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,

Mr. Grayson Peters

5338 Lewis Rd Agoura Hills, CA 91301-2620

graysonapeters@gmail.com



Jordan Hallman <jordan.hallman@lacity.org>

Please support this plan

1 message

Andrew Silver <asilverins@everyactioncustom.com>

Mon, Dec 14, 2020 at 6:21 PM

Reply-To: asilverins@gmail.com

To: downtownplan@lacity.org

Dear Downtown Plan,

Thank you for the opportunity to comment on the forthcoming update to the Downtown Community Plan. I'm writing on behalf of Abundant Housing LA, a pro-housing education and advocacy organization working to help solve Southern California's housing crisis. AHLA supports efforts to promote equity and reform land use regulations and zoning codes, and expand housing production at all levels of income.

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A Downtown Community Plan update that incorporates these policies will help advance our common goals of housing affordability, socioeconomic equity, economic prosperity, and environmental sustainability. Thank you for your consideration, and for your hard work on this important project.

Personally sent by Andrew Silver using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,

Andrew Silver

4328 Bellingham Ave Studio City, CA 91604-1605

asilverins@gmail.com



Jordan Hallman <jordan.hallman@lacity.org>

Please support this plan

1 message

Brian Silveira <silveira.brian@everyactioncustom.com>

Mon, Dec 14, 2020 at 2:34 PM

Reply-To: silveira.brian@gmail.com

To: downtownplan@lacity.org

Dear Downtown Plan,

Thank you for the opportunity to comment on the forthcoming update to the Downtown Community Plan. I'm writing on behalf of Abundant Housing LA, a pro-housing education and advocacy organization working to help solve Southern California's housing crisis. AHLA supports efforts to promote equity and reform land use regulations and zoning codes, and expand housing production at all levels of income.

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Personally sent by Brian Silveira using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,

Brian Silveira

1501 1/2 Cabrillo Ave Venice, CA 90291-5467

silveira.brian@gmail.com



Jordan Hallman <jordan.hallman@lacity.org>

Please support this plan

2 messages

Elias Platte-Bermeo <eliasbermeo97@everyactioncustom.com>

Tue, Dec 15, 2020 at 9:59 AM

Reply-To: eliasbermeo97@gmail.com

To: downtownplan@lacity.org

Dear Downtown Plan,

Thank you for the opportunity to comment on the forthcoming update to the Downtown Community Plan. I'm writing on behalf of Abundant Housing LA, a pro-housing education and advocacy organization working to help solve Southern California's housing crisis. AHLA supports efforts to promote equity and reform land use regulations and zoning codes, and expand housing production at all levels of income.

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Personally sent by Elias Platte-Bermeo using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,

Elias Platte-Bermeo

4215 Duquesne Ave Culver City, CA 90232-2807

eliasbermeo97@gmail.com

Elias Platte-Bermeo <eliasbermeo97@everyactioncustom.com>

Tue, Dec 15, 2020 at 10:01 AM

Reply-To: eliasbermeo97@gmail.com

To: downtownplan@lacity.org

[Quoted text hidden]



Jordan Hallman <jordan.hallman@lacity.org>

Please support this plan

1 message

Thomas Praderio <tom.praderio@everyactioncustom.com>

Tue, Dec 15, 2020 at 2:33 PM

Reply-To: tom.praderio@gmail.com

To: downtownplan@lacity.org

Dear Downtown Plan,

Thank you for the opportunity to comment on the forthcoming update to the Downtown Community Plan. I'm writing on behalf of Abundant Housing LA, a pro-housing education and advocacy organization working to help solve Southern California's housing crisis. AHLA supports efforts to promote equity and reform land use regulations and zoning codes, and expand housing production at all levels of income.

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Personally sent by Thomas Praderio using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,

Thomas Praderio

1610 W 7th St Unit 502 Los Angeles, CA 90017-2228

tom.praderio@gmail.com



Jordan Hallman <jordan.hallman@lacity.org>

Please support this plan

1 message

Prabhu Reddy <prabhu.r.reddy@everyactioncustom.com>

Mon, Dec 14, 2020 at 3:54 PM

Reply-To: prabhu.r.reddy@gmail.com

To: downtownplan@lacity.org

Dear Downtown Plan,

Thank you for the opportunity to comment on the forthcoming update to the Downtown Community Plan. I'm writing on behalf of Abundant Housing LA, a pro-housing education and advocacy organization working to help solve Southern California's housing crisis. AHLA supports efforts to promote equity and reform land use regulations and zoning codes, and expand housing production at all levels of income.

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Personally sent by Prabhu Reddy using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,

Mr. Prabhu Reddy

3731 W 227th St Torrance, CA 90505-2524

prabhu.r.reddy@gmail.com



Jordan Hallman <jordan.hallman@lacity.org>

Please support this plan

1 message

Prabhu Reddy <prabhu.r.reddy@everyactioncustom.com>

Thu, Dec 31, 2020 at 2:04 PM

Reply-To: prabhu.r.reddy@gmail.com

To: downtownplan@lacity.org

Dear Downtown Plan,

Thank you for the opportunity to comment on the forthcoming update to the Downtown Community Plan. I'm writing on behalf of Abundant Housing LA, a pro-housing education and advocacy organization working to help solve Southern California's housing crisis. AHLA supports efforts to promote equity and reform land use regulations and zoning codes, and expand housing production at all levels of income.

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Personally sent by Prabhu Reddy using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,

Mr. Prabhu Reddy

3731 W 227th St Torrance, CA 90505-2524

prabhu.r.reddy@gmail.com



Jordan Hallman <jordan.hallman@lacity.org>

Please support this plan

1 message

Kenneth Salley <ksalleyk@everyactioncustom.com>

Mon, Dec 14, 2020 at 3:21 PM

Reply-To: ksalleyk@gmail.com

To: downtownplan@lacity.org

Dear Downtown Plan,

Thank you for the opportunity to comment on the forthcoming update to the Downtown Community Plan. I'm writing on behalf of Abundant Housing LA, a pro-housing education and advocacy organization working to help solve Southern California's housing crisis. AHLA supports efforts to promote equity and reform land use regulations and zoning codes, and expand housing production at all levels of income.

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Personally sent by Kenneth Salley using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,

Kenneth Salley

5006 S Slauson Ave Culver City, CA 90230-5609

ksalleyk@gmail.com



Jordan Hallman <jordan.hallman@lacity.org>

Please support this plan

1 message

Joey Shields <shieldsjm92@everyactioncustom.com>

Mon, Jan 11, 2021 at 4:20 PM

Reply-To: shieldsjm92@g.ucla.edu

To: downtownplan@lacity.org

Dear Downtown Plan,

Thank you for the opportunity to comment on the forthcoming update to the Downtown Community Plan. I'm writing on behalf of Abundant Housing LA, a pro-housing education and advocacy organization working to help solve Southern California's housing crisis. AHLA supports efforts to promote equity and reform land use regulations and zoning codes, and expand housing production at all levels of income.

As you know, the City of Los Angeles is suffering from a severe housing crisis. Exclusionary zoning, systemic racism, and longstanding constraints on denser housing production, combined with a lack of sufficient funding for affordable housing production and preservation, have led to a massive housing shortage. This has made Los Angeles one of the nation's most unaffordable housing markets. High rents and a lack of new housing opportunities have caused greater financial pressure on families, longer commutes, increasing carbon emissions, more displacement of historically disadvantaged communities, high homelessness, and reduced access to economic and educational opportunities. This has also reinforced longstanding patterns of income and racial segregation in our city's neighborhoods.

The Downtown Community Plan is an important step in meeting the needs of our Downtown residents, and its policies will promote more housing affordability.

I support the Plan for these reasons. I also ask for these additional changes to reduce car dependence and meet housing needs:

Restore the proposed base FAR from the summer 2020 version of the Plan, eliminate proposed maximum building heights, and implement the maximum bonus FAR proposed in the Draft Environmental Impact Report's Alternative 3.

Modify the requirement that residential buildings in Subarea A.3 that use the density bonus program must make at least 30% of the building's units two bedrooms or larger. Encourage the production of affordable family units by introducing a "super-density bonus" tier throughout Downtown, for projects that make at least 30% of the building's two bedrooms or larger.

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Amend the Industrial-Mixed Use 2 (IX2) and Hybrid Industrial 2 (HI2) zones to allow all residential housing types. Do not restrict housing options in these areas to live-work units only.

A Downtown Community Plan update that incorporates these policies will help advance our common goals of housing affordability, socioeconomic equity, economic prosperity, and environmental sustainability. Thank you for your consideration, and for your hard work on this important project.

Personally sent by Joey Shields using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,

Mr. Joey Shields

926 Locust Ave Apt 302 Long Beach, CA 90813-5803

shieldsjm92@g.ucla.edu



Jordan Hallman <jordan.hallman@lacity.org>

Please support this plan

1 message

Stacey Slevcove <sslevcove@everyactioncustom.com>

Tue, Jan 5, 2021 at 10:06 AM

Reply-To: sslevcove@gmail.com

To: downtownplan@lacity.org

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Personally sent by Stacey Slevcove using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,

Stacey Slevcove

1763 E Appleton St Apt 7 Long Beach, CA 90802-3776

sslevcove@gmail.com



Jordan Hallman <jordan.hallman@lacity.org>

Please support this plan

1 message

Matt Stauffer <stauffermt@everyactioncustom.com>

Thu, Dec 17, 2020 at 3:36 PM

Reply-To: stauffermt@gmail.com

To: downtownplan@lacity.org

Dear Downtown Plan,

Thank you for the opportunity to comment on the forthcoming update to the Downtown Community Plan. I'm writing on behalf of Abundant Housing LA, a pro-housing education and advocacy organization working to help solve Southern California's housing crisis. AHLA supports efforts to promote equity and reform land use regulations and zoning codes, and expand housing production at all levels of income.

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Personally sent by Matt Stauffer using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,

Matt Stauffer

908 S Hobart Blvd Apt 504 Los Angeles, CA 90006-1265

stauffermt@gmail.com



Jordan Hallman <jordan.hallman@lacity.org>

Skid Row Now & 2040 Vision document for public comment

1 message

henriette@lapovertydept.org <henriette@lapovertydept.org>

Tue, Dec 15, 2020 at 2:44 PM

To: downtownplan@lacity.org

Cc: Brittany Arceneaux <brittany.arceneaux@lacity.org>

Dear Department of City Planning,

Kindly include our Skid Row Now & 2040 Vision document as a public comment. (see attached)

In June 2017, the Skid Row Now and 2040 coalition was created to engage the DCP/DTLA 2040 process of updating the Downtown Community Plan. We are now excited to submit to you our Vision Document as part of the Public Hearing.

When Urban Renewal wiped out the housing in Bunker Hill in favor of massive skyscrapers, Skid Row, and City Hall, responded by protecting and renovating the existing hotel housing for unhoused folks.

For the past three years, Skid Row Now and 2040 has been rooted in community input and engagement, as evidenced by a grassroots bullet point petition individually signed by 1666 of Skid Row Residents and Stakeholders. Copies of these petitions were delivered to Jose Huizar and the Mayor's Office.

In this year defined by call and response to Racial Equity, this Community Plan process can provide Vision, Language, and Policy - charting the course for a healthy and prosperous tomorrow for Skid Row Residents and Stakeholders.

The land of Skid Row is worth billions of dollars. We stand in solidarity with Skid Row for a future of Justice and Equity.

Sincerely,

Henriëtte Brouwer

for **Skid Row Now & 2040**

Henriëtte Brouwers

[Los Angeles Poverty Department](#)
[Skid Row History Museum and Archive](#)
[Walk the Talk Archive](#)
cell: 310-227.6071

2 attachments

 **Skid Row Now & 2040 2020 Vision Graphic.pdf**
158K

 **Skid Row Now & 2040 2020 Vision.pdf**
249K

EAST 3RD STREET

NEIGHBORHOOD PRESERVATION

- No Net Loss of Affordable Housing

All Existing Units Must Be Protected

- Anti-Displacement Protections

Skid Row Residents Must Be Housed in the Neighborhood and Have Right to a Lawyer if Facing Eviction

- No Changes to Skid Row Boundaries:

No Market Rate Housing to be Built within Traditional Boundaries of Skid Row (3rd to 7th & Main to Alameda)

- Arts & Culture

Direct More Financial Resources and Opportunities to Support Arts & Culture

DEVELOPMENT OPPORTUNITY ENHANCEMENT & INVESTMENT

- Inclusionary Zoning

Developers Required to Set-Aside no less than 25% of Residential Units in DTLA at deeply affordable level for current residents living in poverty

- Affordable Housing Financing

City Must Create New Funding Sources for Affordable Housing Through Developer Fees, Tax Increment Financing, and a Vacancy Tax

HEALTH & WELLBEING

- Green Space & Common Space

Audit City Parks & Recreation and Focus More Physical & Social Resources in Skid Row Parks and Hygiene Services

- Sanitation

Cancel Clean Harbors' Contract and Employ Skid Row Residents for Neighborhood Street Cleaning

- Health & Wellness Protections

No New Bars, Alcohol Sale Permits, or Marijuana Dispensaries in Skid Row and Ensure a Range of Accessible & Affordable Healthy Food Options

NEIGHBORHOOD ENGAGEMENT & PARTICIPATION

- Skid Row Neighborhood Council/ Representative Body for DTLA 2040

Skid Row Residents Have Own Neighborhood Council to Express Voices in City Decisions

- Bridging the Digital Divide

Provide Neighborhood-Wide Internet and Computer Access so Residents Can Attend City Meetings

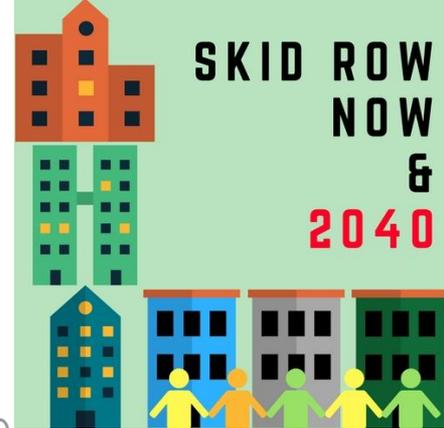
- End the Criminalization of Homelessness

Stop the Over-Policing & Arrest of Homeless People and Defund Police & Redirect Resources

PROTECT THE BOUNDARIES OF SKID ROW !!!

DON'T LET REAL ESTATE MOGULS DESTROY THIS NEIGHBORHOOD FOR LOFTS AND WHOLE FOODS!

7TH AVENUE



SOUTH ALAMEDA STREET



MAIN STREET



Skid Row Now & 2040 2020 Vision

A community plan should be a vision for supporting and responding to the needs of existing neighborhoods, while paving a roadway to a better tomorrow. It should be community-focused, and not driven by business interests or the incongruent placement of buildings to maintain a status quo. With that in mind, we highlight the following principles and vision for the Skid Row neighborhood:

Neighborhood preservation

No Net Loss of Affordable Housing: All existing units must be protected so no affordable housing loss occurs in Skid Row or Downtown Los Angeles. Create and maintain a public registry of units.

Anti-Displacement Protections: Tenants facing evictions have the right to a lawyer and just cause protections in their leases. End discrimination against housing vouchers. Unhoused Skid Row residents must be housed in the Skid Row neighborhood and not displaced.

No Changes to Skid Row Boundaries: The proposed affordability zone must extend to the traditional boundaries of Skid Row (Main to Alameda and Third to Seventh). Remove any existing possibilities for market rate housing to be built within these boundaries and prevent any zoning changes that may allow for market rate housing.

Arts and Culture: Skid Row has a high number of artists and culture bearers that live and work in the neighborhood. Yet it is an underserved neighborhood in a culturally overserved Council District, given the large cultural institutions in Downtown Los Angeles. The City and the Department of Cultural Affairs needs to acknowledge and rectify this by directing more financial resources and opportunities to support arts and culture in Skid Row, such as a property owners fee for the arts, contracts with local artists, Firehouse 23 renovation with extensive and accessible programming for adults and youth, dedicated cultural space in new construction and street vending support for local merchants. The community plan must support the creation and/or sustenance of community cultural centers as creative places to preserve and share local history and enhance neighborhood pride and social cohesion.

Health & wellbeing

Green Space and Common Space: Audit City Parks and Recreation to eliminate overspending in predominantly white, affluent neighborhoods, and focus more physical and social resources in Skid Row parks. Provide more funding for hygiene supporting resources in Skid Row parks based on the 24/7 Refresh Spot model. Build longer crosswalk timers, speed bumps, crossing signals, bike lanes and improved signage on all Skid Row streets. Convert City land to community gardens.

Sanitation: Cancel Clean Harbors' contract and employ Skid Row residents for neighborhood street cleaning and 311 bulky item pickup. Employ residents to staff green toilets 24/7.

Health and Wellness Protections: Downtown LA is saturated with hundreds of alcohol uses and Skid Row, a Recovery Neighborhood, which prioritizes resources for recovery, has been threatened by alcohol-fueled redevelopment. No new alcohol permits shall be issued in Skid Row (including restaurants, bars, and convenience stores). Additionally, no new marijuana businesses shall be permitted (with a possible exception for community run Social Equity businesses-not to exceed 3). Access to affordable, healthy food options and nutritional support is a major priority, supporting the health of Skid Row residents and workers. Incentives must be provided to convert existing stores, promote new businesses, and support community gardens and Farmers Markets.

Neighbor engagement & participation

Skid Row Neighborhood Council/Representative Body for DTLA 2040: A process must be developed, and resources dedicated to support a neighborhood council/representative body for the Skid Row community. This will give residents and workers a direct channel to express our voices on all City decisions related to Skid Row including implementation of the community plan. With Skid Row being a predominantly Black neighborhood, this representative body could address equity concerns, including systemic practices that have historically disenfranchised community members, as well as identify and promote best practices.

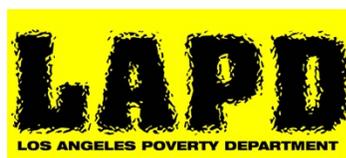
Bridging the Digital Divide: Skid Row residents and workers want to engage with the City and DCP on land use planning and other decisions affecting our neighborhood and our lives. To this end, neighborhood-wide internet and computer access must be provided for Skid Row neighbors to easily access online correspondence and meetings with the City and advocacy groups during the current pandemic.

End the Criminalization of Homelessness: Stop the over-policing and arrest of homeless people. Defund the police and redirect resources to Skid Row residents and workers to improve our neighborhood and our lives. Partner with people experiencing homelessness to create opportunities to address immediate needs and inform systems change. This includes employment opportunities for community members with lived expertise.

Development opportunity enhancement & investment

Inclusionary Zoning: Developers must be required to set-aside no less than 25% of all Downtown Los Angeles residential units built for affordable housing at a deeply affordable level for residents currently living in poverty.

Affordable Housing Financing: The City must create new funding sources for affordable housing through developer fees, tax increment financing, and a vacancy tax. Activate developer fees from the existing TFAR program as well as a new 1% impact bond for rental subsidies. Assess the feasibility of tax increment financing mechanisms such as EIFD, CRIA, NIFTI and AHA, and establish a tax increment financing district in Skid Row and Downtown Los Angeles. Charge a 1% tax annually on any vacant building's value for every year it is vacant and route this funding to affordable housing in Skid Row.



January 6, 2021

Brittany Arceneaux
City Planner, City of Los Angeles, Department of City Planning
200 North Spring Street, Room 667
Los Angeles, CA 90012
Via email: brittany.arceneaux@lacity.org

Re: Comments on ENV-2017-433-EIR: DTLA 2040 Draft Environmental Impact Report (DEIR)

Dear Ms. Arceneaux,

On behalf of the [Los Angeles Coalition for the Economy & Jobs](#) (L.A. Coalition) we would like to express our support for the advancement of a DTLA 2040 Community Plan that will foster Downtown L.A.'s future growth, while serving as a model for other areas in the city that are proximate to transit.

The L.A. Coalition was created in 2009 as an independent and bipartisan alliance to bring together leaders from business, labor, academia and nonprofits to advance sound policies that help to responsibly grow the economy and create quality jobs throughout the Southern California region. As a group, the L.A. Coalition represents organizations with hundreds of thousands of workers throughout the state.

We offer this letter to comment on the Draft Environmental Impact Report (DEIR) for DTLA 2040 and to raise key issues within the plan. Most notably the fact that the DEIR for this plan was prepared in a vastly different context than today -- prior to the COVID-19 pandemic and its resulting economic challenges and before the City was assigned a housing production goal of 455,000 new units throughout the next eight years alone, per the 6th Cycle Regional Housing Needs Assessment. Additionally, there is now a greater need for local land use plans that demonstrate a clear and substantial commitment to transit-oriented growth to help compete for the state and federal transportation infrastructure funding L.A. needs.

As such, we strongly encourage the adoption of Alternative 3 in the DEIR to allow for the greatest housing and development capacity and flexibility to spur DTLA's recovery and best position the heart of our city for private and public investment. And we respectfully offer the following recommendations, that if adopted into the Plan, would strengthen it:

Housing

- Pursue Alternative 3 of the Draft Environmental Impact Report -- as the City's walkable transit and jobs center, the plan should maximize capacity for new housing growth.

- Provide more flexibility for housing options in the Arts District and Fashion District, and do not effectively limit housing to live/work units which are more costly and exclusionary.
- Remove the ban on market rate housing around 5th to 7th and San Pedro to Central -- we should create a socioeconomically integrated and healthy Downtown, not perpetuate failed containment policies.

Community Benefits Program

- Provide a more substantial FAR bonus for affordable housing in DTLA -- high-rise concrete and steel construction in DTLA is more costly than mid-rise wood frame construction prevalent in the rest of the city, and a higher FAR bonus is needed to support feasibility of mixed-income projects.
- Restore previously proposed base FARs -- the recent reductions in base FAR in Chinatown, Little Tokyo, Historic Core and the Fashion District are substantial and create de facto inclusionary housing in these areas, sharply impacting financial feasibility of projects there.

Building Height Limits

- Remove building height limits in Little Tokyo, the Arts District, Historic Core and parts of Chinatown -- these areas are all served by transit and should be places where we aim to maximize opportunities for new housing. Instead of height limits, utilize FAR and urban design tools like setbacks to govern building height and mass, which better aligns with the community benefits program to yield direct benefits and support Downtown's growth, and protect historic districts and buildings through the appropriate established landmarking processes.

Industrial Zoning

- Do not include areas zoned exclusively for industrial uses -- these areas should instead provide more flexible zoning to allow them to gradually convert to other uses, including housing, over the long term.

Approval Process

- It's critical that the plan promotes by-right development and decreases the need for projects to be approved on a subjective, one-off basis under discretionary review. We want to ensure that the plan as a whole fosters feasible development, but also provides mechanisms for projects to obtain minor deviations without triggering the need for CEQA review.

Design Requirements

- We are concerned that the code is too specific in the Arts District and Historic Core and inhibits innovative, creative design. It would also go beyond the scope of any zoning code by dictating allowable building materials in the Arts District and virtually precluding the use of wood, the most affordable construction material. DTLA 2040 should promote flexibility, affordability and innovative design.

Limits on Hotel and Ground-Floor Business Sizes

- Hotels should not be limited to 49 rooms and ground-floor commercial establishments should not be limited to 5,000 square feet within Chinatown and Little Tokyo. There's no clear rationale for these limits, and restricting hotels is antithetical to strengthening DTLA's role as a major visitor destination. Business square footage limits would do nothing to ensure tenants are actually small businesses and would limit potential for desirable tenants.

Thank you for your consideration and we look forward to working together to deliver a DTLA 2040 Community Plan that serves as the guiding framework for DTLA's growth over the next two decades, which will in turn generate economic growth and the good paying jobs that come with it, while improving the quality of life for all Angelenos.

Respectfully,

A handwritten signature in black ink that reads "Michael Kelly". The signature is written in a cursive style with a long, sweeping underline.

Michael Kelly
Executive Director
The L.A. Coalition



UNITED COALITION EAST

December 8, 2020

Los Angeles City Planning
Community Planning Bureau c/o
Brittany Arceneaux, City Planner
200 N. Spring St., Room 667
Los Angeles, CA 90012

Re: Downtown Los Angeles Community Plan (DTLA 2040)

Dear City Planner,

I work for United Coalition East Prevention Project (UCEPP) in the Skid Row area of downtown Los Angeles and am writing on behalf of our coalition members who have expressed concerns and provided input regarding the proposed Downtown Los Angeles Community Plan (DTLA2040). Our organization has worked since 1996 to identify and advocate for policies and practices that discourage excessive access to alcohol and other drugs as well as the problems that frequently result. Additionally, we have worked to promote understanding of the link between the community environment and health.

Skid Row is a historic Los Angeles neighborhood, which has long been home to residents with very low incomes, many of whom are experiencing homelessness. The population is predominantly Black; many community members are seniors, veterans, and youth. A significant number of residents are vulnerable and are contending with serious threats, such as domestic violence and/or substance abuse; others are now in recovery from addiction and supported by a network of housing, services, and other tangible/intangible community resources that are offered within the Skid Row area. This intricate neighborhood tapestry is a mosaic of programs, people and their homes located within the boundaries of 3rd Street (north), 6th Street (south), Main Street (west), and Alameda Street (east). These are historical boundaries of Skid Row which must be honored and intentionally demarcated within this community plan. Additionally, the ix1 zone which encompasses a small portion of Skid Row must adhere to these traditional boundaries.

For over two decades residents and stakeholders within the Skid Row community have advocated to have a representative body (i.e., Skid Row Neighborhood Council) to address its unique needs. This effort has faced immense pushback. Meanwhile in disregard of the voices of residents, the bulk of DTLA development is incongruent with the needs of Skid Row.

UCEPP is extremely concerned about the oversaturation of alcohol uses in and around Skid Row. This alcohol-fueled "redevelopment" threatens the numerous existing services and uses centered on treatment and recovery. Over the years, we have worked to stem this tide, case by case, to little avail. Moreover, the city has repeatedly failed to utilize land use tools needed to protect our neighborhood. For example, Skid Row is located in census tract 2063 and extends into tracts 2062 (shared with Little Tokyo), 2073.02, 2260.02 (shared with the Arts District), and 2060.31 (shared with the Fashion District). Per State of California guidelines set by the Department of Alcoholic Beverage Control based on population, a combined total of nine off-sale and 18 on-sale alcohol licenses are allowed within this area. Yet as of today, there are currently **33 off-sale and a staggering 240 on-sale alcohol licenses** in this space. This excess concentration of alcohol access jeopardizes community health and exacerbates crime, DUI, domestic violence, addiction, vehicular accidents, and other problems. Nevertheless, the city takes no steps to restrict alcohol sales.

Moreover, a recent report on Morbidity Among People Experiencing Homelessness, issued in April of 2020 by the Los Angeles Department of Public Health, noted that alcohol caused or contributed to 16% of overdose deaths in 2018. Since the current pandemic, alarming increases in drinking rates have also been documented among the general population. This crisis will result in major negative public health outcomes in the near future based on documented increases in cirrhosis of the liver prior to the pandemic.

Additionally, our 20-year experience using the city's nuisance abatement process has shown that it can take nearly a decade to address just one problematic alcohol establishment. We need diverse land uses that support community wellness and protect against oversaturation of alcohol outlets. It is a fallacy to claim that on-sale alcohol outlets are benign revenue generators. These businesses have created numerous neighborhood problems for which taxpayers must bear the cost, particularly the cost of increased public services such as police, ambulance, fire, and sanitation needed to respond to activity spurred by alcohol. Furthermore, restaurants create few jobs and those that are created pay low wages. These jobs are typically part-time and rarely provide health insurance or other benefits and they are generally not career path positions. Business operators, property owners, and/or developers are the beneficiaries -- not workers, not neighbors, and not the taxpayers.

It is foolhardy to assume that once problems occur they will be addressed by city enforcement as the city lacks designated staff and resources. When resources for enforcement are expended, they are not distributed equitably. For decades low-income neighborhoods and communities of color have endured the harm of rampant nuisance activity and crime in and around alcohol outlets (both off-sale and on-sale). In our experience, community residents who have documented violations must then struggle to have their voices heard by navigating the complex process of filing complaints and participating in public hearings. It is for these reasons we support a prohibition on new alcohol uses in Skid Row.

Our concerns about the proliferation of alcohol outlets also extend to smoke shops and marijuana businesses. However, the city's cannabis social equity program allows exemptions for communities impacted by the war on drugs. To this end, our coalition supports economic opportunities for this impacted population with limits.

The diversity of land use we seek supports social enterprise, healthy food access, community centers, preservation of local history, advocacy, arts and culture, community cohesion, and multigenerational sharing. We envision a healthy, resilient, empowered, vibrant, Skid Row in the year 2040. By this time, the long-standing needs of the community would be addressed, never to be silenced or ignored again.

We submit this letter in solidarity with the Skid Row Now and 2040 Coalition. We are in support of the groups' recommendation for accessible housing, alcohol and marijuana protections, expanded access to healthy foods, cultural centers, employment opportunities, local park improvements, and expanded green space, as well as investment in neighborhood advocacy to address long standing issues of equity, racism, and systemic neglect in Skid Row.

Respectfully,



Charles Porter, Project Coordinator
United Coalition East Prevention Project
charlesp@socialmodel.com
213.622.1621



Jordan Hallman <jordan.hallman@lacity.org>

Please support this plan

1 message

Zennon Ulyate-Crow <zennonuc@everyactioncustom.com>

Mon, Dec 14, 2020 at 3:37 PM

Reply-To: zennonuc@gmail.com

To: downtownplan@lacity.org

Dear Downtown Plan,

Thank you for the opportunity to comment on the forthcoming update to the Downtown Community Plan. I'm writing on behalf of Abundant Housing LA, a pro-housing education and advocacy organization working to help solve Southern California's housing crisis. AHLA supports efforts to promote equity and reform land use regulations and zoning codes, and expand housing production at all levels of income.

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A Downtown Community Plan update that incorporates these policies will help advance our common goals of housing affordability, socioeconomic equity, economic prosperity, and environmental sustainability. Thank you for your consideration, and for your hard work on this important project.

Personally sent by Zennon Ulyate-Crow using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,

Mr. Zennon Ulyate-Crow

PO Box 680 Topanga, CA 90290-0680

zennonuc@gmail.com

GIDEON KRACOV

Attorney at Law

801 South Grand Avenue
11th Floor
Los Angeles, California 90017

(213) 629-2071
Fax: (213) 623-7755

gk@gideonlaw.net
www.gideonlaw.net

January 13, 2021

VIA EMAIL:

Brittany Arceneaux
Bonnie Kim
Valerie Watson
City Planning Department
City of Los Angeles
brittany.arceneaux@lacity.org
bonnie.kim@lacity.org
valerie.watson@lacity.org

RE: COMMENTS REGARDING DRAFT DOWNTOWN COMMUNITY PLAN UPDATE AND PROCESSES & PROCEDURES ORDINANCE

Dear Ms. Arceneaux, *et al.*:

On behalf of UNITE HERE Local 11 (“**Local 11**”), this Office respectfully provides the following comments to the City of Los Angeles (“**City**”) Department of City Planning (“**DCP**”) regarding the Draft Downtown Community Plan Update (“**CPU**”) and Draft Processes and Procedures Ordinance (“**PPO**”) (collectively “**Project**”) that seek to amend the zoning chapter of the Los Angeles Municipal Code (“**LAMC**” or “**Code**”).

In short, the CPU is slated to govern development in Downtown Los Angeles (through 2040), and the proposed PPO is intended to replace the City’s zoning Code (first in the Downtown area and then the rest of the City as other community plan updates are adopted). Together, the Project makes hotel development easier by upzoning significant swathes of Downtown Los Angeles, allowing hotels in manufacturing zones where current hotels are banned, and making hotels by-right where they are not currently allowed without discretionary land use approvals—like a conditional use permit (“**CUP**”). *Local 11 respectfully urges the City to revise the Project to ensure hotel and other lodging-like uses are subject to a discretionary CUP requirement appealable to City Council.* This CUP requirement will ensure adequate public participation on future projects and allow City discretion to prevent hotel and other short-term lodging development from squeezing out housing opportunities in the City, which are desperately needed in the CPU area and citywide.

Local 11 represents more than 25,000 workers employed in hotels, restaurants, airports, sports arenas, and convention centers throughout Southern California and Phoenix, Arizona. Members of Local 11, including thousands who live or work in the City, join together to fight for improved living standards, working conditions, and affordable housing. Commenting to public officials in connection with matters of public concern such as legislative changes to applicable zoning rules is protected by the First Amendment, the *Noerr-Pennington* doctrine, and is within the union’s core functions.



Local 11 appreciates the opportunity to raise the issues herein with DCP staff during recent conversations. The remainder of this letter highlights our chief concerns:

1. PROPOSED FAR BONUS SYSTEM HURTS HOUSING AND LACKS ADEQUATE CITY DISCRETION

Currently, floor-area-ratio (“FAR”) in Downtown Los Angeles ranges from 1.5:1 FAR to 6:1 FAR for base FAR (prior to any incentives) and up to 13:1 FAR with Transfer of Floor Area Incentives. City Council must ultimately approve transfers of Floor Area under the current system. For example, in the Arts District, Skid Row, Chinatown, Furniture District, and Figueroa heading South, large hospitality developments that max out FAR must normally seek General Plan Amendments and other significant changes to existing zoning in order to accommodate the increased height and FAR. This process, *with Council approval*, ensures adequate Council discretion to ensure FAR bonuses provide adequate value capture for the City.

In contrast, under the proposed plans, the Project increases the base FAR in many parts of the Downtown area, such as areas near the Staple Center, to 7:1-9:1 FAR on most of the parcels currently limited to 6:1 FAR. In exchange for the provision of community benefits, developers can increase the allowable FAR to 13:1 *without City Council Review*. These benefits may include publicly accessible open space, a currently *undefined system* of payments to a Community Benefit Fund, etc. This will be allowed to happen for commercial uses like hotel and other transient lodging uses—to the detriment of long-term housing (e.g., apartments, condos, affordable housing, etc.). By allowing such hotel projects by-right, the City may lose desperately needed housing opportunities given the sites may not be redeveloped again until long into the future (e.g., 30, 50, even 75+ years).

Hence, under the proposed CPU, zoning is changed in these areas to allow larger buildings and more uses, including hotels, but does not provide the same level of Council oversight and opportunity for public vetting to ensure the added commercial development rights: (a) are tied to commensurate public benefits (like the creation of affordable housing); or (b) include appropriate consideration to the current and foreseeable balance of residential/non-residential uses in the area. In sum, *Council discretion/oversite via a discretionary approval process appealable to Council is necessary to ensure that additional commercial development in lieu of housing is appropriate for the area*. Furthermore, more clarity must be given about the *undefined system* of payments to a Community Benefit Fund. To the extent DCP looks to the bonus system under the City’s Transit Oriented Communities (“TOC”) program, the City should *close loopholes that allow hotels to take undue advantage of increase FAR/unit density that comes at the expense of housing opportunities*.¹

2. IMPROPER UPZONING IN MANUFACTURING ZONED AREAS

The CPU also changes the zoning in Downtown areas currently zoned for manufacturing (where hotels are not allowed) to new zoning categories that allow hotels. For example, 4th & Alameda is zoned heavy manufacturing where hotels are not allowed and FAR is limited to 1.5:1. In order to change the zoning under the current system, the Mayor’s Planning Director, the City Planning Commission, and/or the City Council must approve a General Plan Amendment to allow hotel uses and change the zone to increase allowable building size. Under the new plan, the plan

¹ For example, the TOC project located at 623-671 S. La Brea Avenue sought FAR/density bonus to enable a mixed-use hotel/housing project that provided far less market and affordable housing that would otherwise occur if developed like most TOC residential/mixed-use projects with *limited non-residential uses*. See Council File No. 19-1533; see also Local 11 Comments, <https://www.dropbox.com/s/m1fqoi5sv16vhpq/La%20Brea%20Bliss%20Comments%20Combined.pdf?dl=0>.

designation changes to Hybrid Industrial, which allows hotels (assuming a CUP is approved) and FAR is allowed up to 6:1 with a bonus. This conversion of industrial/manufacturing zoned land is in conflict with the City's General Plan Framework intended to "preserve" industrial planned lands.²

Additionally, the conversion of industrial land for hotel and other non-manufacturing/industrial uses can lead to future incompatibility issues related to e-commerce warehouse uses. As e-commerce and same-day delivery have exploded in recent years—even more so during the COVID pandemic—the need for warehouses near customers has also exploded. With warehouse vacancy rates extremely low, developers have sought locations near and around large urban areas—particularly smaller warehouses less than 250,000 square feet in size. These warehouses are precisely the type of manufacturing/industrial uses that are intended to be served by the City's industrial-zoned areas where there is adequate street infrastructure to serve large tractor-trailers hauling consumer goods. However, if the City converts industrial zoned properties for hotels and other non-industrial uses, these warehouses will be sited in less compatible areas—often near residential-zoned areas with streets/infrastructure never intended for such intense industrial uses. Hence, conversion of industrial land should not be allowed and, to the extent conversion of industrial/manufacturing zoned land for non-industrial uses is deemed proper, it should be limited to permanent housing opportunities (e.g., market or affordable) and not for commercial uses like hotel/lodging uses.

3. EXPANDING BY-RIGHT HOTEL DEVELOPMENT IS NOT JUSTIFIED

In most of Los Angeles, hotels (which are generally built in "C" commercial zones) within 500 feet of a residential zone generally require a CUP, appealable to the Area Planning Commission, in order to be built. Thus, hotel projects in most of Los Angeles are subject to a CUP process that provides public review as a means to limit/mitigate community impacts. However, under the proposed zoning Code (intended to ultimately be used throughout Los Angeles), most "use districts" will not require hotels to obtain a CUP. The proposed zoning allows hotels by-right in all commercial-mixed zones (what under the old zoning Code would be called a commercial zone) and IX-1, industrial-mixed zone to be built with no CUP. Similarly, while manufacturing zones ban hotels in most cases under the current zoning Code, the proposed PPO would allow hotels in all but one "industrial-mixed" zone (roughly equivalent to M-1, and M2 under current zoning) – either by-right or via a CUP (IX-3, IX-4). We do not understand the justification for this unwarranted change. We have a housing crisis in this City, not a hotel crisis. Why is the City making more hotels by-right? So too, it is unclear whether this substantial upzoning allowing by-right hotels has been adequately assessed under the California Environmental Quality Act ("CEQA").

Hotels and other lodging uses present a myriad of issues that need careful discretionary consideration. As previously mentioned, the development/redevelopment of a site for hotel use would remove the opportunity to use the site for permanent housing (e.g., market or affordable housing). Hotels can bring occupational, transit, noise, and public safety impacts that need mitigation. Additionally, this proposal could disrupt or exacerbate jobs/housing imbalance in the area (e.g., adding more hotel use in areas already adequately served by hotel uses and lacking adequate permanent housing). Furthermore, some vacant properties formerly used for residential uses could be redeveloped without considering the loss of housing that once occupied the site.³

² See e.g., <https://planning.lacity.org/cwd/framwk/chapters/03/030.htm> and <https://planning.lacity.org/cwd/framwk/chapters/03/03209.htm>.

³ While the proposed PPO and other laws may in some instances require one-for-one replacement of existing housing, this merely serves to maintain the status quo and will not provide adequate new housing

These issues are fact-specific and require careful consideration on a project-by-project basis that can only be ensured via a discretionary approval process. Hence, Local 11 urges the City to require a CUP requirement (appealable to Council) for all hotel and similar lodging-use, subject to the following Code-required findings:

- a. The impact of the project and future employees of the hotel or motel on the demand in the plan area for housing, public transit, child-care, and other social services.
- b. The measures that will be taken by the project sponsor to employ residents of Downtown in order to minimize increased demand for transportation.
- c. The measures that will be taken by the project sponsor, including a transportation demand management plan, to encourage hotel workers and visitors alike to use public transportation, cycling and other non-auto means of transportation.
- d. The effect of the project on local small businesses, including if applicable any potential displacement of local small businesses, and any measures by the project sponsor to increase demand for local goods and services.
- e. There is sufficient market demand for lodging structures of the type proposed.
- f. The project will not negatively impact the housing affordable to Angelenos within the plan area and will not demolish or convert existing residential uses.

The above-mentioned CUP findings are based mainly on similar CUP requirements adopted by other large cities⁴ and would ensure that City decision-makers have the necessary discretion to consider these vital issues as hotel projects are presented.

4. PRIOR CONCERNS ABOUT THE PPO ARE UNADDRESSED

In late 2018, Local 11 met with DCP staff to discuss various concerns about specific provisions of the then-proposed PPO and requested various changes to the PPO as it related to (a) notice and transparency, (b) limits on administrative decisions, and (c) the City's CEQA approval process (as fully outlined in Local 11's letter to DCP dated October 4, 2018 [attached hereto as Exhibit A]). However, these concerns and proposed changes are not clearly reflected in the now-proposed PPO.⁵ Hence, Local 11 requests clarity to the extent to which the concerns previously raised and proposed changes are reflected in the current PPO.

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opportunities. Furthermore, this proposal does not address the issue where properties formerly served as affordable housing (e.g., older housing stock subject to Rent-Stabilized Ordinance) were vacated through Ellis Act evictions or Cash-for-Keys program. To the extent these properties are then converted into hotels without commensurate replacement of prior residential units, it will ultimately reduce the City's housing inventory.

⁴ See e.g., San Francisco Municipal Code § 303(g), https://codelibrary.amlegal.com/codes/san_francisco/latet/sf_planning/0-0-0-21892; Oakland Municipal Code § 17.103.050, https://library.municode.com/ca/oakland/codes/planning_code?nodeId=TIT17PL_CH17.103SPREFICEUSCL_ARTIIIICOAC_17.103.050TRHACOAC.

⁵ <https://planning.lacity.org/public-hearing-draft-new-zoning-code>.

In conclusion, Local 11 thanks DCP for the opportunity to discuss these issues. We respectfully urge the City to revise the CPU and PPO to include our recommendations, including but not limited to imposing a Code-required CUP for all hotel/lodging projects in the CPU area. Thank you for your consideration.

Sincerely,



Gideon Kracov
Attorney for Local 11

Attachment:

Exhibit A: Local 11 (10/4/18) Request for DCP Meeting Regarding Draft Processes and Procedures Ordinance

EXHIBIT A

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October 4, 2018

VIA EMAIL:

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RE: Request for DCP Meeting Regarding Draft Processes and Procedures Ordinance

At the request of Unite HERE Local 11 (“Local 11”), this Office respectfully requests a meeting with the City of Los Angeles (“City”) Department of City Planning (“DCP”) to discuss Local 11’s concerns and proposed changes with the current draft of the Processes and Procedures Ordinance (“PPO”),¹ which seeks to amend the zoning section of the Los Angeles Municipal Code (“LAMC” or “Code”).

The PPO is a component of the re:code LA project (“Re:code”), both of which are “meant to lay the groundwork for a more user-friendly, transparent, and predictable set of zoning regulations” while also maintaining “long-standing opportunities for public participation.”²

To this end, Local 11 requests a meeting with DCP to discuss its comments and recommendations for the PPO, most of which can be generally characterized as technical edits. The following is a summary of proposed changes, which are further elaborated in the below section titled “Concerns with Specific PPO Provisions”:

NOTICE AND TRANSPARENCY

- Require all Letter of Determinations (“LODs”) to include verifications of being posted online with time-stamped references.
- Require mail/email notice to all persons on a project’s “Interested Person List” when a project hearing is scheduled, continued, LOD issued, appeal withdrawn, and other similar developments in the project approval process. Furthermore, require notice to nearby property owners for all site-specific Zoning Administrator’s Interpretations (“ZAIs”).

¹ Dated June 1, 2018 and accessed from <https://recode.la/processes-and-procedures-staff-hearing-draft-06-01-2018>.

² See DCP Staff Report (10/1/18) DCP Case No. CPC-2016-3182-CA, pp. 1-2, https://recode.la/sites/default/files/project_files/CPC-2016-3182-CA%20-%20FINAL%20Staff%20Report%20with%20Appendices.pdf; see also City Website (2018) PLAN Re:code: About the Project (Re:code is intended to “reorganize” the LAMC as part of a comprehensive overhaul of the City’s planning process that makes the Code more “transparent.”), <https://recode.la/about>.



- Require DCP to compile and make available online all ZAIs, Zoning Engineer's memorandum ("ZE Memos"), joint memos by DCP and the Department of Building and Safety ("ZA/ZE"), and all other similar zoning rules/regulations relied upon by the City including, but not limited to, those documents referenced in the City's Zoning Manual.
- Clarify that the record in all matters shall include the projects' entire administrative record and that a Zoning Administrator ("ZA"), Area Planning Commission ("APC"), City Planning Commission ("CPC"), the Director of Planning ("Director"), the City Council ("Council"), or any other decision-maker may not arbitrarily exclude substantial evidence submitted into the record.
- Clarify that Site Plan Review ("SPR") is applicable to all projects, not just those within the Greater Downtown Housing Incentive Area, and any project that individually or cumulatively result in 50 or more dwelling units/guest rooms—including projects that achieve this via a change in its Certificate of Occupancy ("CoO").

PUTTING APPROPRIATE LIMITS ON ADMINISTRATIVE DISCRETION

- Consistent with City Charter § 558, the PPO should bar developer-initiated General Plan Amendments ("GPAs") that do not coincide with a concurrent update and environmental review of the respective community/specific plan.
- Various Conditional Use Permits ("CUPs") permit the decision-maker to grant the CUP with Conditions of Approval ("COAs") that exempt the project from height and area regulations otherwise required under the Code. DCP should make clear that the granting of any CUP does not relieve the applicant from securing Code-required entitlements supported by Code-required findings (e.g., adjustments, modifications, variances, etc.).
- Require CPC to timely prepare detailed guidelines for the Director when reviewing subsequent modifications and plan approval for projects receiving Class 3 CUPs or other discretionary entitlements. These guidelines must be narrowly tailored to prevent project piecemealing.
- Make clear that projects seeking "Modification of Entitlement", "Alternative Compliance", or otherwise not in compliance with zoning regulations and seeking zoning relief are not ministerial decisions.

CEQA

Further, with regard to the California Environmental Quality Act ("CEQA") provisions, the following changes are proposed:

- Explicitly state a CEQA appeal stays the issuance of demolition permits by the Department of Building and Safety ("DBS").
- Explicitly condition all entitlement grants as being final only upon a timely City CEQA appeal not being filed, or the Council's final action on a CEQA appeal, or upon all timely appeals being withdrawn prior to Council action.
- Explicitly permit email submissions to satisfy the requirement that appellant comments be received by the City Clerk five days before the public hearing for the CEQA appeal, typically heard by the City's Planning and Land Use Management Committee ("PLUM").
- Explicitly allow appeals of addenda and program environmental impact reports ("PEIRs) consistency determinations.

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- Explicitly permit appellants to respond to new analysis and/or comments first presented to the public by the applicant on its eve-of-hearing submissions two days before the public hearing on CEQA appeals. Additionally, explicitly permit appellants and the public to comment on new analysis/comments presented for the first time during PLUM hearings. These responses should not be arbitrarily excluded from the project's administrative record and should be considered by PLUM, Council, or the Mayor when deciding to grant or deny a CEQA appeal.
- Explicitly bar DCP from furnishing applicants with Notice of Exemptions ("NOEs") or Notice of Determinations ("NODs") until all applicable CEQA deadlines have lapsed without any timely filed CEQA appeals being filed, all timely appeals being withdrawn, and/or final Council action on a timely filed CEQA appeal.

I. CONCERNS WITH SPECIFIC PPO PROVISIONS

The remainder of this document explains concerns citing specific provisions of the current language in the draft PPO. Note, all page citations henceforth are to the PPO unless indicated otherwise.

A. PPO § 13.2.08: APPEALS

- Requires appeals to be submitted 15 days after issuance of LOD (p. 31). However, this Office has encountered numerous occasions where LODs have been mailed on a Thursday or Friday and not received more than five days later the following week. More concerning, several times LODs have been issued and LODs not posted online. Hence, the PPO should require all LODs to have a verification that LODs have been posted online with a time-stamped reference, and that any LOD not posted online shall be considered non-effective until said time.
- If during the appeal hearing the appellate body announces the matter is continued, it is not required to give notice (*id.*). However, this fails to inform interested parties (e.g., nearby residents or businesses) and those who may have been engaged during the project review process (e.g., submitted inquiries with DCP planner, comment letters, emails, etc.). Critically, these hearings are often scheduled during working hours when individuals cannot attend the public hearing. Hence, consistent with the PPO/Re:code goals of transparency and informed decision making, DCP should provide continuance notice by email/mail to those listed on the interested person list.
- States that the appellate body can base its decision by, *inter alia*, "its own record" or "on the record created by the initial decision maker" (*id.*). The PPO should make clear that the record shall include all information submitted to the City before the final hearing is closed and that all evidence relied upon by the appellate body must be made available to the public (e.g., referenced in the LOD, placed in project file). The appellate body cannot arbitrarily limit the record by excluding substantial evidence submitted by the public.
- Where a single appeal is filed but withdrawn during the appeal period, the appeal period is reopened for ten days upon mailing of the appeal withdrawal notice (p. 32). However, as discussed above, DCP has a track record of mailing determination late in the week. The time period for reopening appeals should be extended to the same 15-day appeal period and posted online.

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B. PPO § 13.3.01: GENERAL PLAN ADOPTION/AMENDMENT

- While stating GPAs can be initiated by “*only*” the Council, CPC, or the Director (under various initiation procedures), the PPO says that “*requests by private parties* to amend each of the community plan areas shall be *batched into geographically based groups*. The Director of Planning shall establish the boundaries of the groups and may modify them as necessary in order to more effectively carry out the purpose and intent of this section” (p. 39). While GPAs can be considered “only during the period set forth in the adopted schedule for review of the geographic area,” CPC or Council may authorize a deviation from the adopted schedule, if appropriate due to unusual financial loss, extreme hardship, provide for affordable housing or other social benefits, or achieve compatible land uses or other planning objectives (*id.*). Notwithstanding the City Charter § 558 limiting initiation of GPAs to Council, CPC, or the Director, the City has a longstanding practice of processing private projects with developers requesting GPAs for individual properties. The abovementioned PPO provisions seem to be an attempt by the City to limit this type of activity. Under this new “batching” process, however, the public may be forced to assess a slew of individual projects in a massive GPA and environmental impact report (“EIR”). This may result in numerous project approvals relying on a single statement of overriding considerations.³ Moreover, CPC or Council may nevertheless grant deviations from the approved scheduling and process GPAs for individual projects citing pro forma, developer-driven justifications (e.g., financial hardship in delaying project construction, the necessity to bring affordable housing online if the project includes as much, social benefits like Transient Occupancy Tax revenue from a hotel project). Hence, *consistent with the City Charter, the PPO should bar developer-initiated GPAs and limit batching to the extent it does not coincide with the review/approval of a City-initiated community/specific plan update*. This would be consistent with PPO § 13.3.02 that limits initiation of specific plan adoption/amendment to “only” Council, CPC, or the Director (p. 52).

C. PPO § 13.4.01: CONDITIONAL USE PERMIT, CLASS 1

- ZAs “may waive the public hearing” if the Chief ZA finds that the requested entitlements “will not have a significant effect on adjoining properties or immediate neighborhood” (pp. 68-69). However, this does not guarantee a public hearing where the public submits substantial evidence of a potential impact, which the Chief ZA may disagree and discard (legitimately or otherwise). Hence, *PPO should make clear that objections based on articulated facts and evidence shall constitute a meaningful objection that warrants a public hearing for CUPs*.

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³ For example, a batched GPA may cherry pick the politically salable components of a few projects to justify the lack of social benefits associated with other projects in the batch. Alternatively, if the batched GPA only discusses the proposed increase in heights/density in the abstract—divorced from specific projects—the City may approve the GPA without consideration of more concrete impacts and mitigation measures resulting from a subsequent specific project. If that subsequent project needs no discretionary approvals (i.e., relying on the by-right zoning granted under the batched GPA), then the City has arguably lost any ability to assess and impose feasible mitigation measures. Alternatively, in such cases, developers could argue that mitigation methods were known at the time the batched GPA was adopted, but the City declined to implement said mitigation requirements and that it is too late to address the issue for a later specific project.

- ZAs may grant a Class 1 CUP with COAs that exempt the project from “height and area regulations required by other provisions of [the Code] shall not apply to the conditional use approved” (p. 69). This suggests that a project can seek a CUP and receive additional zoning relief without seeking the appropriate entitlement with the decision-maker making the appropriate Code-required findings (e.g., Adjustments, Zone Changes, Variance, etc.). Moreover, CUPs related to relief from use regulations as compared to relief from area regulations (e.g., height, setbacks, density). The PPO should make clear that the granting of a CUP should not exempt the project from applicable area regulations and the need to secure the appropriate entitlement based on adequate Code-required findings.
- On appeal, the APC shall base its decision “on the record established by the [ZA]” (p. 70). Again, this suggests that the City can arbitrarily shrink the record. The PPO should make clear that the decision shall be based on the entire administrative record before the close of the final hearing.

D. PPO § 13.4.02: CONDITIONAL USE PERMIT, CLASS 2

- On appeal, the APC shall base its decision “supported by facts in the record” (p. 73). Here, this language does not include language referenced above that suggests the record can be impermissibly shrunk. The PPO should make the scope of the record clear and consistent throughout the entire PPO – everything submitted until the close of the final hearing.
- Provides subsequent modifications of the entitlement (p. 74), which may be problematic if considered ministerial (discussed below PPO §§ 13.5, 13.7, *et seq.*). This should be deleted.

E. PPO § 13.4.03: CONDITIONAL USE PERMIT, CLASS 3

- As an initial decision-maker, CPC shall render its decision “at a public meeting” after a public hearing “is closed” (p. 78). However, there is no explicit mention that the decision, and associated findings, must be made via a LOD that triggers appeal deadlines (see e.g., p. 89 [stating “decision shall be in writing based upon evidence in the record”]). This should be addressed (i.e., LOD required) and the PPO should make clear that the record includes the entire administrative record up to the close of the final hearing.
- Again, CPC may grant a Class 3 CUP with COAs that exempt the project from “height and area regulations required by other provisions of [the Code] shall not apply to the conditional use approved” (p. 79). As discussed above (see comments regarding PPO § 13.4.01), this is improper and needs to be deleted.
- A Class 3 CUP granted by CPC may be reversed or modified by Council “supported by facts in the record” or by the Mayor “solely upon the administrative record” (p. 80). This is the most appropriate standard for what the record includes—the entire administrative record including all evidence submitted before the final approval by the legislative decision-maker. This should be the standard throughout the PPO.

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- Provides subsequent modifications of the entitlement (p. 80), which may be problematic if considered ministerial (discussed below PPO §§ 13.5, 13.7, *et seq.*). Furthermore, it provides that CPC may approve or deny subsequent plans based on whether the plans “conform to the purpose and intent of the findings” (p. 81). This authority can be delegated to the Director upon CPC establishing “reasonable guidelines and policies” (*id.*). This Office is unaware of any guidelines/policies yet established but could be akin (in form) as the guidelines for amendments to special zoning classifications.⁴ *It is critical that guidelines for modifying any entitlement be timely created and not left open-ended.* Otherwise, applicants can expand the scope of its project to include uses, densities, and other components not previously identified in the project description of the associated environmental review.

F. PPO § 13.4.04: PROJECT REVIEW

- Project Review (i.e., SPR) requires SPR for projects creating or resulting in 50 or more dwelling/guest rooms (p. 84). Subsection A.2 states that certain residential buildings located within the Greater Downtown Housing Incentive Area is subject to SPR and applies to “individual projects for which permits are sought and also to the cumulative sum of related or successive permits which are part of a larger project” (*id.*). It would seem (based on the bolded subheading) the “Individual or Cumulative Projects” language was intended to be a separate subsection. As currently written, the PPO suggests that SPR is only required for projects in the downtown area rather than “any development” resulting in 50 or greater units/rooms (*see* LAMC § 16.05.C.1(b)). *The PPO should make clear that SPR is required for all projects triggered by the conditions under LAMC § 16.05 subsection “C”, and make the “Individual or Cumulative Projects” provision a stand-alone provision.* Additionally, the PPO should make clear that individual, related, and success permits from DBS (e.g., CoO) that seek to change the use of dwelling units into guest rooms shall also be subject to SPR.
- If the Director finds SPR will have a significant effect on neighboring properties, the Director “may” set the matter for a public hearing (p. 87). However, nothing requires a public hearing when the public provides substantial evidence of potential impacts. *Hence, the PPO should state that public comments proffering articulable facts and evidence of potential impact shall constitute meaningful objections warranting a SPR public hearing.*

G. PPO § 13.5 (MINISTERIAL ACTIONS) & PPO § 13.7, ET SEQ. (QUASI-JUDICIAL RELIEF)

- States that ministerial actions do not require public hearings or appeal rights and that projects that do not comply with applicable regulations may request relief through the “Alternative Compliance” procedures outlined in PPO § 13.7, *et seq.*, (p. 92). However, PPO § 13.7.01 provides that Alternative Compliance is initially decided by the Director with APC serving as the appellate body with public hearings and noticing required (pp. 114-115). Similarly, PPO § 13.7.04 allows “Modification of Entitlement” for projects seeking up to 20 percent increase to be subject to initial/appeal review and public hearing and notice requirements (p. 124-125). Hence, *PPO should make clear that Alternative Compliance, Modification of Entitlement, and all other projects not in compliance with applicable zoning regulations are not ministerial actions.*

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⁴ See Amendment to Council “T” Instructions & “Q” or “D” Clarification Form, https://planning.lacity.org/Forms_Procedures/7778.pdf.

H. PPO § 13.9.01: INTERPRETATION OF ZONING CODE

- Allows the ZA to make citywide or site-specific interpretation of the Code (i.e., ZAIs) (p. 141). Under the City Charter § 561, “[a]ll rules and regulations shall be available for inspection in the Office of Zoning Administration.” While some of these interpretations are referenced in the City’s Zoning Manual (in addition to other memos and decisions often relied upon by the City),⁵ there is no repository of the full text of these ZAIs and other documents. Nor, are they consolidated within the Zoning Administrator for public inspection.⁶ As a result, these decisions amount to secret zoning rules/regulations that are not made available to the public and can be cited to by applicants and the City when convenient. The PPO should make clear that all of these ZAI and other documents must be consolidated and accessible to the public online.
- Despite having a citywide or local impact, no notice or public hearing is required for a ZAI (p. 141). This is particularly problematic and arbitrary for site-specific ZAIs (e.g., ZAI interpreting project is by-right and not subject to CEQA despite potential impacts to neighboring properties). Hence, PPO should provide notice/public hearing rights for at least site-specific ZAIs. This would at least inform potentially aggrieved persons of a future decision that would trigger appeal deadlines (p. 142).

I. PPO § 13.14, ET SEQ: CEQA PROVISIONS

- PPO states that CEQA appeals can only be taken on exemptions, negative declarations (“NDs”), MNDs, and EIRs (p. 267). Addenda and consistency with PEIRs also should be appealable under CEQA.
- PPO states that a CEQA appeal stays “any entitlement that relied upon the CEQA Clearance ... [and] any action or approvals by other City departments in reliance upon the entitlement that relied upon the CEQA Clearance” (citing DBS building permits as an example) (pp. 267-268). This should also explicitly include demolition permits given potentially acute CEQA impacts related to demolition and where demolition often constitutes the first permit sought after securing entitlements/CEQA clearance.
- PPO states that the CEQA appeal does not stay the statute of limitations to challenge the entitlements (i.e., land use lawsuit) (p. 268). Hence, when entitlements are finally approved by a non-elected decision-maker but there exists a timely-filed CEQA appeal pending Council review, aggrieved parties still have to file zoning lawsuits within 90 days notwithstanding potential corrective action by the City during the CEQA appeal. This is redundant and easily avoided by stating that a pending CEQA appeal also stays the finality of the underlying entitlements. This avoids the undue burden on aggrieved parties filing and the City defending against land use lawsuits that may be mooted upon Council taking corrective action. This correction also avoids potential City-liability from vested right claims made by applicants when the City reverses the lower decision (i.e., grants the appeal whether with or without remand) resulting in the project approvals subject to the CEQA Clearance becoming “void” (p. 269).

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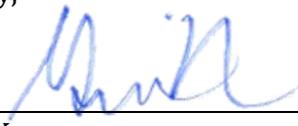
⁵ See Zoning Manual (Aug. 2016), PDF p. 2 (e.g., ZAIs, ZEIs, ZA/ZE Memos), <https://www.ladbs.org/docs/default-source/publications/information-bulletins/zoning-code/zoning-code-manual-and-commentary.pdf?sfvrsn=17>.

⁶ This Office is of the understanding that prior efforts to examine ZAIs and other like decisions at the Office of Zoning Administration have been rebuffed.

- PPO requires all appellant documents to be submitted to the City Clerk five business days before the hearing, while all others (e.g., applicant) require to be filed two business days (p. 269). First, the PPO should provide submission by email satisfies this requirement. Second, it should provide some opportunity for appellants to respond to eve-of-hearing CEQA submissions by the applicant that includes a new analysis not yet publicly vetted. Otherwise, applicants will have a vested interest to delay submission of its analysis to evade meaningful review. Alternatively, the PPO could include provisions that applicant submissions shall include only rebuttal testimony and that appellants may respond to any new analysis not previously disclosed by the applicant.
- Nor is there any discussion about new evidence or claims made during the public hearing (likely before PLUM) (*id.*). Appellants and the public should have the opportunity to respond to new CEQA evidence presented for the first time at PLUM, but before action by the full Council.
- PPO states that the Council may consider only those documents “timely filed on the appeal” (p. 269). For the reasons discussed above, the Council on a CEQA appeal should include all relevant documents part of the Project’s administrative record.
- PPO states that the final date for filing an NOE/NOD is the day Council acts on the appeal (p. 271). However, it has been DCP practice to prepare proposed NOEs/NODs well in advance of a project’s first public hearing on its entitlements. Alternatively, DCP has prepared NOEs/NODs after final project approval but before the lapse of the City’s CEQA appeal deadline (yet to be codified)—all of which have resulted in applicant’s filing premature NOEs/NODs and forcing aggrieved parties to file perfunctory CEQA actions. Hence, the PPO should explicitly state that all entitlements are not final until the expiration of all City CEQA appeal deadlines with no timely appeals being filed, or until Council action when a timely CEQA appeal is filed. Furthermore, the PPO should explicitly state that an NOE/NOD shall not be furnished to the applicant until said time periods have been satisfied.

Let us know if you can meet soon to discuss the contents of this letter. If you have any questions regarding the above comments or recommendations, please don’t hesitate to contact this Office. Thank you for your consideration.

Sincerely,



Gideon Kracov

CC:

James Elmendorf (jelmendorf@laane.org)

Charlie Carnow (ccarnow@unitehere11.org)



Jordan Hallman <jordan.hallman@lacity.org>

Please support this plan

1 message

Bernabe Valderrama <bvalderrama@everyactioncustom.com>

Mon, Jan 11, 2021 at 8:36 PM

Reply-To: bvalderrama@linchousing.org

To: downtownplan@lacity.org

Dear Downtown Plan,

Thank you for the opportunity to comment on the forthcoming update to the Downtown Community Plan. I'm writing on behalf of Abundant Housing LA, a pro-housing education and advocacy organization working to help solve Southern California's housing crisis. AHLA supports efforts to promote equity and reform land use regulations and zoning codes, and expand housing production at all levels of income.

As you know, the City of Los Angeles is suffering from a severe housing crisis. Exclusionary zoning, systemic racism, and longstanding constraints on denser housing production, combined with a lack of sufficient funding for affordable housing production and preservation, have led to a massive housing shortage. This has made Los Angeles one of the nation's most unaffordable housing markets. High rents and a lack of new housing opportunities have caused greater financial pressure on families, longer commutes, increasing carbon emissions, more displacement of historically disadvantaged communities, high homelessness, and reduced access to economic and educational opportunity. This has also reinforced longstanding patterns of income and racial segregation in our city's neighborhoods.

The Downtown Community Plan is an important step in meeting the needs of our Downtown residents, and its policies will promote more housing affordability.

I support the Plan for these reasons. I also ask for these additional changes to reduce car dependence and meet housing needs:

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Modify the requirement that residential buildings in Subarea A.3 that use the density bonus program must make at least 30% of the building's units two bedrooms or larger. Encourage production of affordable family units by introducing a "super-density bonus" tier throughout Downtown, for projects that make at least 30% of the building's two bedrooms or larger.

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A Downtown Community Plan update that incorporates these policies will help advance our common goals of housing affordability, socioeconomic equity, economic prosperity, and environmental sustainability. Thank you for your consideration, and for your hard work on this important project.

Personally sent by Bernabe Valderrama using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,

Bernabe Valderrama

1505 Stanley Ave Long Beach, CA 90804-1442

bvalderrama@linchousing.org



Jordan Hallman <jordan.hallman@lacity.org>

Please support this plan

1 message

Bernabe Valderrama <bvalderrama@everyactioncustom.com>

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Personally sent by Bernabe Valderrama using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,

Bernabe Valderrama

1505 Stanley Ave Long Beach, CA 90804-1442

bvalderrama@linchousing.org



Jordan Hallman <jordan.hallman@lacity.org>

Please support this plan

3 messages

Robert Vega <robrayvega@everyactioncustom.com>

Tue, Dec 15, 2020 at 2:14 AM

Reply-To: robrayvega@gmail.com

To: downtownplan@lacity.org

Dear Downtown Plan,

Thank you for the opportunity to comment on the forthcoming update to the Downtown Community Plan. I'm writing on behalf of Abundant Housing LA, a pro-housing education and advocacy organization working to help solve Southern California's housing crisis. AHLA supports efforts to promote equity and reform land use regulations and zoning codes, and expand housing production at all levels of income.

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Personally sent by Robert Vega using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,

Robert Vega

908 S Hobart Blvd Apt 508 Los Angeles, CA 90006-6210

robrayvega@gmail.com

Robert Vega <robrayvega@everyactioncustom.com>

Tue, Dec 15, 2020 at 2:15 AM

Reply-To: robrayvega@gmail.com

To: downtownplan@lacity.org

[Quoted text hidden]

Robert Vega <robrayvega@everyactioncustom.com>

Tue, Dec 15, 2020 at 2:16 AM

Reply-To: robayvega@gmail.com
To: downtownplan@lacity.org

[Quoted text hidden]



Jordan Hallman <jordan.hallman@lacity.org>

Please support this plan

1 message

Buffy Visick <buffyvisick@everyactioncustom.com>

Mon, Dec 14, 2020 at 2:22 PM

Reply-To: buffyvisick@gmail.com

To: downtownplan@lacity.org

Dear Downtown Plan,

Thank you for the opportunity to comment on the forthcoming update to the Downtown Community Plan. I'm writing on behalf of Abundant Housing LA, a pro-housing education and advocacy organization working to help solve Southern California's housing crisis. AHLA supports efforts to promote equity and reform land use regulations and zoning codes, and expand housing production at all levels of income.

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Personally sent by Buffy Visick using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,

Buffy Visick

315 W 5th St Los Angeles, CA 90013-1997

buffyvisick@gmail.com



Jordan Hallman <jordan.hallman@lacity.org>

Please support this plan

1 message

Elisa Visick <evisick@everyactioncustom.com>

Mon, Dec 14, 2020 at 3:04 PM

Reply-To: evisick@rocketmail.com

To: downtownplan@lacity.org

Dear Downtown Plan,

Thank you for the opportunity to comment on the forthcoming update to the Downtown Community Plan. I'm writing on behalf of Abundant Housing LA, a pro-housing education and advocacy organization working to help solve Southern California's housing crisis. AHLA supports efforts to promote equity and reform land use regulations and zoning codes, and expand housing production at all levels of income.

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Personally sent by Elisa Visick using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,

Elisa Visick

429 1/2 N Avenue 57 Los Angeles, CA 90042-3405

evisick@rocketmail.com



Jordan Hallman <jordan.hallman@lacity.org>

Please support this plan

1 message

Jay Williams <jay.will.math@everyactioncustom.com>

Mon, Dec 14, 2020 at 6:48 PM

Reply-To: jay.will.math@gmail.com

To: downtownplan@lacity.org

Dear Downtown Plan,

Thank you for the opportunity to comment on the forthcoming update to the Downtown Community Plan. I'm writing on behalf of Abundant Housing LA, a pro-housing education and advocacy organization working to help solve Southern California's housing crisis. AHLA supports efforts to promote equity and reform land use regulations and zoning codes, and expand housing production at all levels of income.

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Personally sent by Jay Williams using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,

Jay Williams

645 W 9th St Apt 541 Los Angeles, CA 90015-1653

jay.will.math@gmail.com



Jordan Hallman <jordan.hallman@lacity.org>

Please support this plan

1 message

Andrew Wong <andrew.wong45@everyactioncustom.com>

Mon, Dec 14, 2020 at 3:30 PM

Reply-To: andrew.wong45@gmail.com

To: downtownplan@lacity.org

Dear Downtown Plan,

Thank you for the opportunity to comment on the forthcoming update to the Downtown Community Plan. I'm writing on behalf of Abundant Housing LA, a pro-housing education and advocacy organization working to help solve Southern California's housing crisis. AHLA supports efforts to promote equity and reform land use regulations and zoning codes, and expand housing production at all levels of income.

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Personally sent by Andrew Wong using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,

Mr. Andrew Wong

567 N Michigan Ave Apt 1 Pasadena, CA 91106-4915

andrew.wong45@gmail.com



Jordan Hallman <jordan.hallman@lacity.org>

Please support this plan

1 message

David Youssefyeh <youssefyeh@everyactioncustom.com>

Tue, Dec 15, 2020 at 4:04 PM

Reply-To: youssefyeh@yahoo.com

To: downtownplan@lacity.org

Dear Downtown Plan,

Thank you for the opportunity to comment on the forthcoming update to the Downtown Community Plan. I'm writing on behalf of Abundant Housing LA, a pro-housing education and advocacy organization working to help solve Southern California's housing crisis. AHLA supports efforts to promote equity and reform land use regulations and zoning codes, and expand housing production at all levels of income.

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Personally sent by David Youssefyeh using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,

David Youssefyeh

6524 Orange St Los Angeles, CA 90048-4722

youssefyeh@yahoo.com



Jordan Hallman <jordan.hallman@lacity.org>

Fwd: Ricardo Flores said to me on SMS on 28/9/2020 16:11 PDT "Hi Raymond Yu, I just receive a word that work orders have been issued to replace the signal heads at Bernard Street. Can't provide a timeline for installation at this time. Sincerely Ricar...

1 message

Brittany Arceneaux <brittany.arceneaux@lacity.org>
To: Jordan Hallman <jordan.hallman@lacity.org>

Thu, Dec 17, 2020 at 3:43 PM

FYI can you add this to the public hearing comment folder?

----- Forwarded message -----

From: **Raymond Yu** <ramonyu@hotmail.com>

Date: Thu, Dec 17, 2020 at 2:24 PM

Subject: Re: Ricardo Flores said to me on SMS on 28/9/2020 16:11 PDT "Hi Raymond Yu, I just receive a word that work orders have been issued to replace the signal heads at Bernard Street. Can't provide a timeline for installation at this time. Sincerely Ricar...

To: brittany.arceneaux@lacity.org <brittany.arceneaux@lacity.org>

Good Afternoon Brittany Arceneaux for Chinatown Neighborhood Deputy of Los Angeles Department of City Planning Unit, I'm sorry that my computer or telephone microphone is not working properly because Jackie Kim could not hear my voice, I'm writing you a comment letter indicating that, 2020 is the worst year ever of the Coronavirus Pandemic Covid-19 with under Stay at Home Order. Good news is 2021 Golden Dragon Parade originally scheduled on Saturday, February 13, 2021 taking place in Chinatown Los Angeles has been suspended or cancelled for the next 2 years due to the infectious season mentioned above, it



January 13, 2021

Downtown Community Plan
Los Angeles Department of City Planning
200 N. Spring Street, Room 667
Los Angeles, CA 90012

Ladies and Gentlemen:

On behalf of Van Wagner Outdoor, LLC, I submit these comments to the Draft Downtown Community Plan ("Draft Plan") and a new Zoning Code ("Draft Code") for the City of Los Angeles.

The Draft Plan and Draft Code are largely silent on the inclusion of digital or static advertising signage in the development areas covered by the Draft Plan. There appears to be no plan to include advertising signage in the expanded and redeveloped downtown area, except by relying on specially created signage usage districts on a case by case basis.

Advertising signage, including large scale supergraphic and digital advertising signs, can play a very important and constructive role in helping to develop the to-be expanded downtown Los Angeles area as a vibrant and thriving commercial, entertainment and tourist attraction. Advertising signs provide an important source of revenue and income to property developers and owners that can help finance and maintain the important buildings and other structures that anchor the development area and can fund important elements needed for a vibrant downtown LA, including affordable housing and open space. Equally important, signage can play other significant civic functions in the expanded downtown area. Signage is a vital element in place creation, helping to foster an exciting destination area. Digital signage affords the opportunity for all kinds of interactive experiences which will help contribute to the vibrancy of the expanded downtown area. Signage also can be used for important way-finding functions. In addition, signage can be used for important public service announcements, civic events, safety alerts and other public purposes, all of which can help keep residents and visitors informed and contribute significantly to an enhanced sense of community.

Los Angeles has seen large scale supergraphic and digital advertising signage play all of these important roles in its current downtown hub around the Staples Center. There is no reason that as the downtown area is further developed and expanded, the Draft Plan and the Draft Code should not incorporate large scale static and digital signage in a responsible way to continue to play the same role it currently plays in the Staples Center area.

As currently drafted, the Draft Plan and Draft Code would continue to rely almost exclusively on SUDs for the inclusion of any advertising signage. This is a cumbersome, slow, and inefficient process that inevitably leads to unbalanced sign development. That, in turn, results in overdevelopment of signage in some areas, paucity of signage in other areas, and the absence of a coordinated

VAN WAGNER OUTDOOR, LLC
800 Third Avenue, New York, New York 10022-7604
Tel: (212) 699-8400 Fax: (212) 986-0927



VanWagner

and thoughtful signage plan that can most effectively contribute to the successful development of the expanded downtown area.

Van Wagner respectfully requests the Draft Plan and the Draft Code be amended to allow for the inclusion of large-scale advertising signage – both static and digital – in a thoughtful and responsible way. The Draft Plan and Draft Code should include opportunities for development of large-scale signage in a manner that will allow signs to help proactively and constructively foster a vibrant, exciting commercial and entertainment area for the benefit of Los Angeles' residents, businesses, and visitors.

Very truly yours,

Waid Abu-Ghazaleh
Senior Vice President
Real Estate Development



December 1, 2020

Brittany Arceneaux, City Planner
City of Los Angeles Department of City Planning
200 North Spring Street, Room 667
Los Angeles, CA 90012
Via email: brittany.arceneaux@lacity.org

Re: Comments on ENV-2017-433-EIR: DTLA 2040 Draft Environmental Impact Report (DEIR)

Dear Ms. Arceneaux,

Established in 1924, Central City Association is an advocacy organization committed to DTLA’s vibrancy and increasing investment in the region. We are a membership organization comprised of approximately 300 members and our membership reflects the diversity of DTLA including housing builders, nonprofit organizations and large employers. We are committed to the DTLA 2040 Community Plan and making sure that it advances DTLA’s growth and serves as a model for other areas in the city that are proximate to transit. We offer this letter to comment on the Draft Environmental Impact Report (DEIR) for DTLA 2040 and to raise key issues within the plan that we believe inhibit much-needed housing production amid a housing and homelessness crisis and will hinder economic recovery from the COVID-19 pandemic and future economic growth. **Importantly, the DEIR for this plan was prepared in a vastly different context than today -- prior to the COVID-19 pandemic and resulting economic depression, before the City was assigned a housing production goal of over 455,000 for the next eight years and apart from state and federal infrastructure considerations. As such, we strongly encourage the adoption of Alternative 3 in the DEIR to allow for the greatest housing and development capacity and flexibility to spur DTLA’s recovery and best position the heart of our city for private and public investment (REC #1).**

We believe that DTLA 2040 cannot be considered in a vacuum separate from the conditions affecting DTLA and the city at large, and what is at stake for our future. Our detailed comments on the plan herein are informed by three major considerations:

1. The deep impacts of the COVID-19 pandemic on DTLA and the City’s economy and future growth;
2. The persistent housing and homelessness crisis, and unprecedented City housing production responsibility of over 455,000 new units over the next eight years alone, per the 6th Cycle Regional Housing Needs Assessment (RHNA); and
3. The need for local land use plans to demonstrate a clear and substantial commitment to transit-oriented growth to compete for state and federal transportation infrastructure funding.

1. The Impacts of the COVID-19 Pandemic

While COVID-19 has impacted every community, DTLA, the city’s urban high-rise core, has faced unique challenges as perceptions of urban living contributing to pandemic spread have perpetuated. Office towers are nearly empty, and many retail and restaurant businesses are shuttered which will likely persist for years to come as the pandemic has resulted in permanent job losses and shifts to remote work. DTLA normally receives over 22 million visitors in a given year, serving as an anchor of our local economy, but a depressed tourism market without conventions or events is reflected in an astoundingly low hotel occupancy rate of about 40 percent and drops in revenue per available room of over 50 percent compared to last year.¹ Apartment dwellers have increasingly looked to live

¹ *Second Quarter 2020 Downtown LA Market Report*, Downtown Center Business Improvement District:
<https://ctycms.com/ca-dtla/docs/dtla-market-report-q2-2020.pdf>

outside the city center, and residential rents have fallen by seven percent compared to last year and vacancy rates are near 15 percent.²

The pandemic has dramatically changed the landscape of DTLA. Projects that were previously financially viable have greatly diminished in value. We're hopeful that DTLA's economic prospects will strengthen as restrictions are lifted, successful vaccines are obtained and made widely available and perceptions of urban life improve. However, it may be some time before circumstances get better, and DTLA 2040 must be sensitive to this economically vulnerable context if we are to continue to see new growth and community benefits in DTLA.

2. The Housing and Homelessness Crisis and RHNA Obligations

As the Southern California Association of Governments (SCAG) finalizes the 6th Cycle RHNA, it's clear that the City of Los Angeles will be responsible for delivering an incredible amount of new housing by the order of more than 455,000 units between 2021 to 2029. The magnitude of this housing target cannot be overstated – in the City's history, only 420,000 units were built at the peak of housing production over the course of 20 years between 1960 to 1980. At the same time, homelessness in the city continues to increase, growing by over 14 percent last year reaching more than 41,000 unhoused people living in the city, 16 percent of whom are in DTLA which is the largest concentrated street homeless population in the nation. While this housing goal stands out as seemingly astronomical, in reality it reflects a persistent housing and homelessness crisis that has long-been one of the major issues facing the city and region, but left largely unaddressed by solutions of the necessary scale.

The DTLA 2040 plan notes that SCAG projects that DTLA will make up over 20 percent of the city's growth over the next two decades, which is a significant share of the City's RHNA target and means that at least 12,000 units per year on average need to be built in DTLA over the next eight years alone. As the region's transit and job hub, DTLA must play an outsized role in meeting this ambitious goal, requiring DTLA 2040 to provide substantial capacity for new growth. Alternative 3 of the DEIR is the superior alternative as it would enable the greatest growth and housing production.

3. Competing for State and Federal Infrastructure Funding

State and federal funding for transportation and other infrastructure projects are increasingly tied to land use plans that provide substantial new opportunities for growth and development near transit. Moreover, current efforts to establish an Enhanced Infrastructure Financing District (EIFD) in DTLA offer the promise of a dedicated local source of funding for an array of public benefit projects, including affordable housing, in DTLA that can also help attract supplemental state and federal funding, but can only be impactful if supported by land use planning that promotes new development to bolster property tax increment growth.

As we continue to build out our regional transit system, revamp our bus network to be world class and dedicate resources to making DTLA and our city truly multimodal, the success of these major investments will be dependent on coordination with visionary planning for new development in tandem. It is also critical as we look ahead to draw new public and private investment to DTLA and our city – DTLA 2040 must be a clear signal to this end.

We believe much of the plan as proposed is a great improvement to DTLA's land use and planning framework and we are appreciative of City Planning's outreach and engagement, and the important changes already made to the plan over the course of its development. We recognize that DTLA 2040 is an enormous undertaking for City Planning as it will be the first community plan to implement the new citywide zoning code. We appreciate the significant resources dedicated to the plan's development and are pleased that DTLA continues to be the City's laboratory for new ideas, but DTLA 2040 must go even farther to promote a bold, exciting and resilient future for our city center. **We offer this letter to strongly encourage adoption of Alternative 3 in the DEIR and to provide detailed suggestions to enhance the plan, with the goal of a connected, equitable and inclusive DTLA that has a broad range of housing**

² Ibid.

options and affordability, park space, education and childcare facilities and diversity in mobility and employment opportunities.

Building off of our [January 21, 2020 letter](#), we've broadly categorized our recommendations as follows: 1) maximizing opportunities for housing at all income levels, including middle-income housing and 2) creating flexibility within the plan to be adaptable over the next two decades. Underpinning this all, we are focused on a plan that can support financially feasible development, which is critical to yielding the housing growth and maximum community benefits envisioned in the plan as well as depoliticizing development in DTLA.

Maximizing Opportunities for Housing, Including Middle-Income Housing

CCA strives to make DTLA the place for new housing at all income levels. Despite being just one percent of the city's land, DTLA accounts for over one-third of new apartment units built in the city over the past decade. Ensuring that substantial new housing can continue to be built in DTLA is essential to addressing our regional housing crisis and meeting our RHNA and environmental sustainability goals by focusing growth in the densest and most transit- and job-rich area of the city.

On paper the plan would generally expand where housing is allowed from 33 percent of the plan area to 60 percent and major changes toward parking policy like eliminating minimum parking requirements are important steps to supporting project feasibility and fostering high-quality development appropriate for urban cores. Additionally, we appreciate the recent revision to the plan to no longer count above-ground parking toward project FAR, which would have had diminished capacity for housing. Still, there are specific provisions throughout the plan that would negatively impact the feasibility of housing development in practice. We believe the following provisions are problematic as proposed and offer suggested solutions that reasonably accommodate plan intent and economic feasibility.

Financial Feasibility of the Community Benefits System

The plan's proposed Community Benefits System would allow developments to maximize FAR and build larger than otherwise allowed under the base zoning in return for providing certain public benefits, namely affordable housing, publicly-accessible open space and community facilities. This new system would apply throughout the plan area and replace the Transfer of Floor Area Rights (TFAR) program that currently applies only to South Park, the Financial District and parts of the Historic Core. We are generally supportive of the proposed concept of the Community Benefits System, and we share the goal of realizing more on-site public benefits, especially affordable housing. We are also pleased to see recent changes to the Community Benefits System that provide clearer upfront standards to enable Level 2 benefits like open space and community facilities through a by-right process rather than via discretionary review. However, we are concerned about specific provisions that impact the financial feasibility of utilizing the bonus FAR, particularly for high-rise projects at this immensely economically challenging time for DTLA.

The economic fallout from the pandemic presents major issues for building in DTLA, but it's important to note that the Community Benefits System, primarily the affordable housing bonus provisions, poses challenges for the financial feasibility of development even in strong economic conditions. As shown in the table below, Level 1 of the DTLA 2040 Community Benefits System is essentially aligned with the City's Affordable Housing Density Bonus and Tier 1 of the Transit Oriented Communities (TOC) Program in terms of the percentage of affordable housing required by income level (with the exception of options for Deeply Low and Moderate Income housing under DTLA 2040). However, the FAR bonus for providing affordable housing is 35 percent, which is at the lowest end of the City's affordable housing incentive programs in alignment with the Density Bonus.



Comparison of DTLA 2040 Level 1 Affordable Housing Incentive Program and Other City Affordable Housing Programs

		TOC Tier 1	TOC Tier 2	TOC Tier 3	TOC Tier 4	Affordable Housing Density Bonus	DTLA 2040 Community Benefits Program Level 1
Affordability Requirements	Deeply Low	n/a	n/a	n/a	n/a	n/a	5%
	Extremely Low	8%	9%	10%	11%	n/a	8%
	Very Low	11%	12%	14%	15%	11%	11%
	Low	20%	21%	23%	25%	20%	20%
	Moderate	n/a	n/a	n/a	n/a	n/a	40%
Bonus	Density Increase	50%	60%	70%	80%	35%	n/a
	FAR Increase	40%	45%	50%	55%	35%	35%

The Density Bonus and TOC programs have been effective at producing mixed-income developments with on-site rent-restricted affordable housing elsewhere in the city. However, most development in the city outside of DTLA is mid-rise wood frame construction, which is a less costly type of construction than the high-rise concrete and steel construction that is typical in DTLA. Type I projects, which are generally high-rise buildings made of concrete and steel, cost an average of \$71 per square foot more than other construction types like Type V wood frame buildings.³ Coupled with adverse economic conditions, this means that high-rise construction in DTLA faces higher costs for lower value. We believe DTLA is the best place for high-rise construction, which is the most efficient way to build a high volume of housing near transit, and is largely built with unionized labor, providing well-paying jobs. **We recommend that Level 1 of the DTLA 2040 Community Benefits Program provide a more substantial FAR increase to support the feasibility of high-rise construction. We also believe that the ability to contribute an in-lieu payment or partner with an affordable housing provider to provide affordable units off-site are good, important features of the Community Benefits System that must be maintained as they offer necessary flexibility (REC #2).**

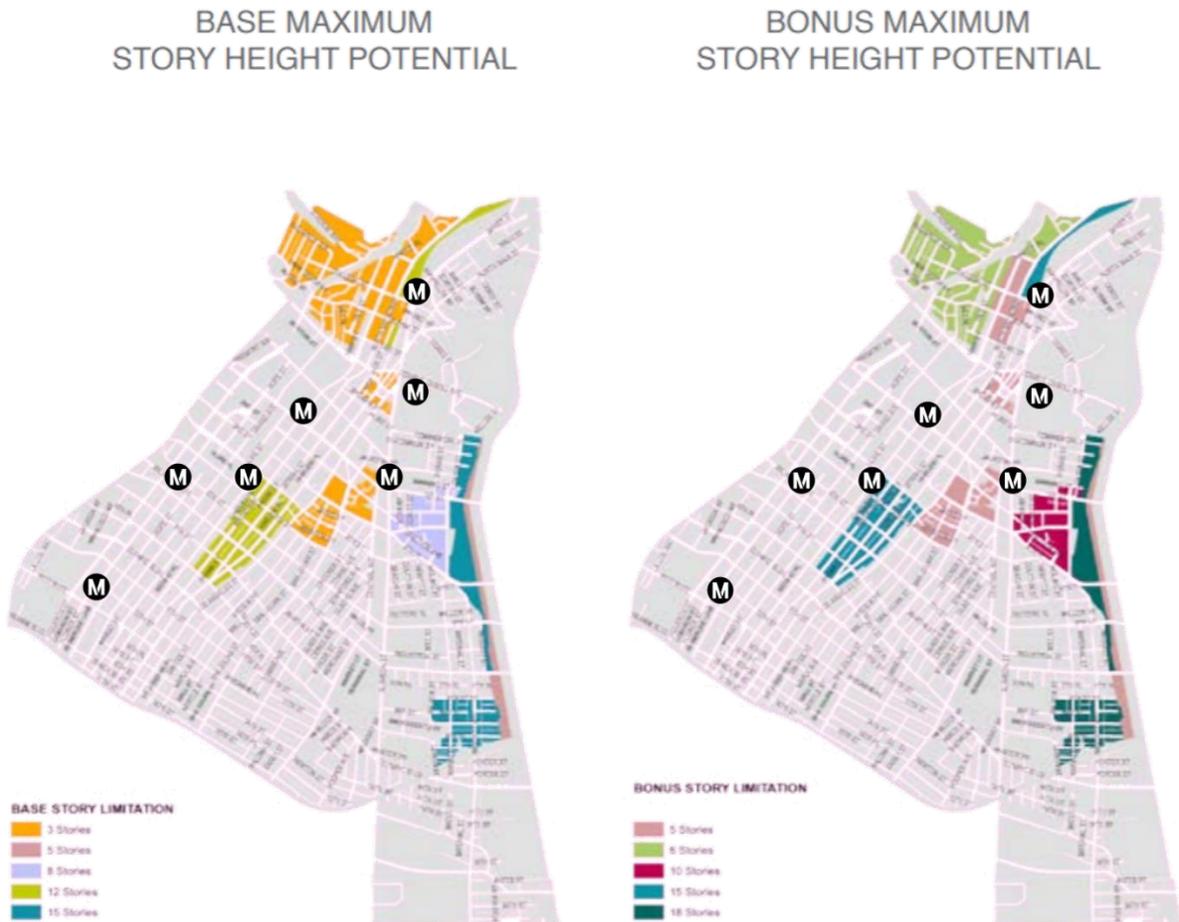
Additionally, we are concerned about recent changes to the plan whereby base FARs were reduced in Chinatown, Little Tokyo and areas of the Historic Core and Fashion District. The changes are substantial: from 6.0 to 2.0, a 66 percent decrease, in Chinatown and Little Tokyo, and from 7.0 and 6.0 to 3.0, a 60 percent and 50 percent decrease respectively, in the Historic Core and Fashion District. While we understand the intent of these changes is to ideally increase usage of the Community Benefits System, we are concerned that this is too dramatic of a change that tips the scales of project economics to be economically infeasible. These are walkable, transit-rich areas where we want to promote growth, but the reductions in base FAR create a de facto scenario where the FAR is too low to build a viable project under the base FAR allowances on the one hand while simultaneously placing a large financial onus on projects to obtain bonus FAR via the Community Benefits System. Because the Level 1 affordable housing FAR bonus is 35 percent of the base FAR, the Level 1 bonus is necessarily reduced as well (for example, a 35 percent bonus on 6.0 base FAR is an additional 2.1 FAR, but is only an additional 0.7 FAR on a 2.0 base FAR). The October 2019 financial feasibility analysis of the Community Benefits System prepared by HR&A Advisors for the City specifically highlights this issue, stating that Chinatown and a large swath of the Fashion District leading into the Historic Core, where most of these FAR changes would apply, “are unlikely to support larger high-rise developments until market performance matures further, and thus are not able to support public benefits to the same degree as Place Types with strong submarkets.” **As it’s clear that these recent reductions in base FAR would jeopardize development feasibility, we firmly recommend maintaining base FARs as they were proposed prior to the Fall 2020 changes to the plan. (REC #3).**

³ *The Hard Costs of Construction: Recent Trends in Labor and Materials Costs for Apartment Buildings in California*, UC Berkeley Turner Center for Housing Innovation: http://turnercenter.berkeley.edu/uploads/Hard_Construction_Costs_March_2020.pdf

Building Height Limits and Minimums

As shown in the map below, the plan would impose base and bonus (with use of the Community Benefits Program) maximum building height limits in Little Tokyo, the northern portion and eastern edge of the Arts District, Chinatown, and Historic Core, all of which are close to existing Metro rail stations. There are also major transit projects in these areas in the pipeline, like the Regional Connector, West Santa Ana Branch and Streetcar. Like the reduction in base FARs, we take issue with the proposed building height limits, particularly in areas near transit stations as we are investing hundreds of billions of dollars in building out our transit system and as these are exactly the areas we need our city to grow to become less car-dependent and more affordable and sustainable. It is essential to demonstrate our commitment to growth in areas near transit as we compete for infrastructure funding from the state and federal governments.

Base and Bonus Height Limits with Existing Metro Stations



We recognize the need to preserve DTLA’s historic neighborhoods, communities and buildings but are concerned about the proposed approach. Blanket height limits are not an appropriate tool for neighborhood preservation. Historic districts and buildings should be considered through the requisite historic preservation and landmarking processes, which is much more targeted and would not inhibit growth on sites that might not have historic or cultural

significance. Additionally, we believe that context-sensitive growth can occur with the use of urban design tools like setbacks and street frontage requirements.

Furthermore, in many cases, the proposed building height limits are not aligned with the economic realities of development and the constraints of relative construction materials. For instance, mixed-use buildings can generally be built with wood frame over a concrete parking and retail podium to a maximum of eight stories under the building code, and buildings made of concrete and steel can be taller but typically need to be a minimum of 20 stories to be financially feasible and justify the additional costs of the more expensive labor and building materials. Some of the proposed base and bonus height limits in areas of DTLA are 12 stories and 15 stories, respectively, and 15 and 18 stories, respectively. With a few exceptions for large sites that can accommodate a lot of building capacity, most mixed-use developments will not even be able to build to the base height limits of 12 and 15 stories, and these height limits will act like an eight-story limit in reality. This means that the growth envisioned by the plan may not actually occur and the resulting community benefits will also not be delivered.

To promote context-sensitive growth and density near transit, respect neighborhood character and appropriately preserve historical assets in a way that reflects the economic realities of development, we recommend that building height maximums be removed and instead utilize FAR, setbacks and frontage requirements to govern building height and massing, and that historic communities be considered instead through the established historic preservation processes (REC #4).

Conversely, the new zoning code proposes to include building height minimums, which may also be problematic and limit the potential for new development. While the intent of this is clearly to encourage, and even require, high-rise development, the reality is that high-rise development may not be feasible in certain locations or for certain uses including most affordable housing developments. For instance, K-12 schools, which are incentivized as a Tier 2 community benefit, typically require one-story or other generally low-rise construction, but they would be precluded in many areas. **We recommend that minimum building height requirements be removed to avoid unintended outcomes like limiting the potential for vacant or underutilized land to be redeveloped into desirable uses like affordable housing, schools or mid-rise mixed-use developments (REC #5).**

Transit Core General Plan Land Use Designation

Similar to our concerns about base FAR reductions and building height limits near transit, we believe the Transit Core General Plan land use designation is not being appropriately applied in connection with where transit exists now and in the future, and that we must do more to leverage public investment in transit infrastructure. The Transit Core designation allows projects that use the Community Benefits System to calculate FAR using the centerline of the street, which has been a successful feature of the current Transfer of Development Rights (TFAR) system that allows projects in DTLA to be larger and yield more public benefits. **We recommend that the Transit Core General Plan land use designation be expanded to include all areas close to existing, entitled and future transit to maximize development opportunities (REC #6).**

Limits on Housing in Hybrid-Industrial Areas

The plan effectively limits new housing in the Fashion District and Arts District to live/work units only. While recent updates to the plan would technically allow more types of housing in the Fashion District, there is a requirement that projects with housing be coupled with a minimum of 1 FAR of office or light industrial space, unless they are live/work. As there is very little demand for new office or light industrial uses in these areas, and with the uncertainties around these uses resulting from COVID, we believe the code as written will have the effect of limiting development in hybrid industrial areas to live/work.



We understand that the City may be constrained in this area by the Framework Element of the General Plan, which essentially limits the ability to rezone industrial areas and requires some amount of “jobs-producing” uses. However, we do not believe that a document adopted 20 years ago should inhibit our ability to plan for another 20 years into the future and cause us to settle for live/work housing when we want to create inclusive, dynamic neighborhoods.

In general, live/work units require high floor to ceiling heights and must be built to commercial standards so are typically more expensive to design and build than a residential unit. The plan requires that live/work units in a project must be a minimum average size of 750 square feet in the Fashion District and 1,000 square feet in the Arts District, which is very economically and spatially inefficient for studios and one-bedroom units. Because they are lofts and lack the walls or partitions of conventional apartments, they are generally not good units for families; requiring these kinds of units is inherently exclusionary. Lastly, they are also impossible to monitor to ensure that they are supporting economic “job-producing” activity, rather than just serving as costly residential lofts.

We recommend that City Planning adopt an amendment to the Framework Element in tandem with DTLA 2040, which will allow for far greater flexibility to plan hybrid industrial areas as mixed-use neighborhoods with a diversity of housing types (REC #7). In lieu of amending the Framework Element, we believe that there could still be more flexibility for different housing types in Hybrid-Industrial areas. **In the absence of an amendment to the Framework Element, we recommend that for projects that include more conventional multi-family housing, set the commercial space requirement as 10% of building area, which will create fairer rules for all projects than the current requirement that is based on lot size, especially those that don’t use a site’s full FAR (REC #8).**

The proposed IX4 Use District that applies to the Arts District also requires that all new structures be built entirely as Type I, II or IV construction, which largely excludes the use of wood materials. As mentioned earlier, wood is more affordable and sustainable than concrete and steel building materials. Wood has also been successfully used to build compellingly designed buildings in the Arts District and throughout the city. Amid our current housing crisis, greatly reducing the ability to use wood construction is counterproductive and runs counter to our goal of making DTLA the place for housing at all income levels. **DTLA 2040 is seemingly the first community plan that has attempted to dictate construction types and we believe such a determination is out of scope for zoning codes to mandate and should be left to building and safety codes – we recommend that this requirement be removed from the plan (REC #9).**

Ban on Market Rate Housing

As proposed, DTLA 2040 will not allow market rate housing in a specific area of DTLA from 5th to 7th Streets and San Pedro Street to Central Avenue. We echo and fully endorse the report titled [The Voices of Central City East](#) submitted by the Central City East Association (CCEA) regarding this neighborhood of DTLA.

As CCEA highlights, the intent of banning market rate housing in this area may be to preserve existing affordable housing and single room occupancy hotels, but it is unnecessary given covenants, the Residential Hotel Conversion and Demolition Ordinance, the Wiggins Settlement and predominance of housing that is owned by non-profit organizations with a mission to provide shelter to vulnerable populations. This area contains the largest concentration of unsheltered homeless people in the nation. It is an area of extreme poverty and need. Banning market rate housing would further concentrate poverty in this area of DTLA and run counter to stated DTLA 2040 plan goals of inclusive and diverse neighborhoods.

To date, there are no market rate developments, built or proposed, in this area. Imposing this provision would only freeze the current conditions and further a failed policy of containment. We believe this policy also directly conflicts with the federal mandate to Affirmatively Further Fair Housing (AFFH). Affordable housing is an important part of DTLA 2040, and it should be integrated throughout the plan area. We strongly support housing opportunities for all incomes across DTLA as the primary tool to address the complicated and extensive challenges of homelessness and poverty in our city.

It's important to recognize that the Community Plan, which is a land use and zoning plan, cannot alone address the challenges of this area. Truly meeting the needs of this area requires a much broader effort that involves mental health, workforce development and social services, which will take coordination from multiple departments and organizations, which we support and encourage.

We support CCEA's report and recommendations, and likewise recommend that the ban on market rate housing from 5th to 7th Streets and San Pedro Street to Central Avenue be removed from DTLA 2040, and instead urge City Planning to consider ways the area's zoning can be tailored to produce mixed-income developments and socioeconomic integration and inclusion (REC #10).

Micro-Units

CCA has been strongly supportive of micro-unit housing, including publishing a [white paper on micro-units](#) and advocating for a [proposal put forth by Councilmember Cedillo](#) for the City to assess barriers and policy changes to support micro-units. The Community Plan Text includes micro-units as a priority for new housing types (LU 2.6), however there is an important missing policy tool that would help effectuate this goal.

A simple but meaningful policy change would be allowing affordable units to be a different mix than market rate units in the same building, but still require the same amount of overall affordable floor area. The unit finishes, access points for entry/exit and amenities would be identical for the market rate and affordable units. For example, DTLA 2040 could allow two 350 square foot affordable units on par with one 700 square foot market rate unit in the same building. This would be a deviation from the City's [Affordable Housing Guidelines](#), which generally require that affordable units be the same average square footage and number of bedrooms as market rate units in the same building.

We believe that DTLA is an appropriate place for a flexible policy to encourage affordable micro-unit housing because it is dense, transit-rich and walkable, which are all complementary to micro-units. We also believe this is meaningful tool to increase the amount of affordable housing that can be leveraged by non-subsidized development and may help to deliver the workforce, moderate income housing that is currently not being built but is needed.

We recommend DTLA 2040 allow affordable units to be a different mix than market rate units in the same mixed-income buildings, but still require the same amount of affordable floor area as a percentage of overall residential floor area akin to the number of affordable units that would be required of the total number of units (REC #11). This would yield a greater number of affordable housing units while still requiring the same dedication of square footage.

Creating Flexibility Within the Plan to be Adaptable Over the Next Two Decades

DTLA 2040 will guide DTLA's growth over the next 20 years but it is unreasonable to believe that we can adequately plan in anticipation of the changes that will take place over that time. It is fundamentally important that the plan set a strong overarching vision for DTLA but be structured to provide sufficient flexibility to adapt to changes if it is to be a success. When we refer to flexibility, we mean allowing a broad range of land use and development scales, designs and typologies in all areas of DTLA, and with clear, simple approval pathways for minor deviations that may be necessary to facilitate development. We believe that highly specific provisions included in the plan today, even if well-intentioned, may have unintended downstream consequences that will make the plan less useable in the future, and instead result in projects seeking discretionary review or quell development altogether. Here again, we are appreciative that City Planning has recently made important changes that remove unnecessary constraints and create more flexibility in alignment with plan goals with revisions such as no longer requiring schools and child care facilities to obtain Conditional Use Permits (CUPs) in most areas, and not limiting hotels by number of rooms or ground-floor commercial tenants by square footage outside of Chinatown and Little Tokyo. We believe there are additional areas of the plan that can be amended to ultimately make DTLA 2040 more flexible and sustainable, and we outline each area of the plan where we believe provisions are overly rigid and with our recommended revisions.

Approval Processes

We know that City Planning and CCA have a shared goal of ensuring that DTLA 2040 greatly reduces the need for projects to seek discretionary approvals and creates greater capacity for by-right and ministerial approval processes. The approval processes laid out in DTLA 2040 refer back to the Processes and Procedures Ordinance, which is Article 13 of the new citywide zoning code being created as part of the re:code LA project. However, we are concerned that the Processes and Procedures Ordinance has not yet been finalized and adopted, and likely will not be until the middle of 2021. This makes it very challenging to provide detailed comments on the approval processes under DTLA 2040 and creates uncertainty for implications that the Processes and Procedures Ordinance might have on DTLA 2040. We're hopeful that the proposed zoning that is established under DTLA 2040 will produce financially feasible developments, but we know that there's a good possibility that projects with unique circumstances will need to deviate from the baseline zoning to be feasible. **While ultimately providing objective criteria and flexibility in each site's zoning is the best way to avoid issues of uncertainty and discretion in the approval process, we recommend that City Planning provide very clear, administrative clearance processes that are CEQA-exempt for deviations and relief mechanisms like alternative compliance, variances and adjustments (REC #12).**

We also appreciate that the proposed plan creates higher Site Plan Review thresholds for projects that use the Community Benefits System to be 500 units or 500,000 square feet of nonresidential space, up from 50 units and 50,000 square feet of nonresidential space. We have long been advocates for a more sensible approach to Site Plan Review that does not punish dense, urban development, particularly in our urban core. Although we believe the higher Site Plan Review benchmark is certainly an improvement over the very low threshold currently, we believe that affording this only to projects that use the Community Benefits System creates a punitive scenario for projects using only the base zoning and does not account for DTLA's role as the city's center for growth. **We recommend that projects, whether using the base zoning or the Community Benefits System, not be subject to Site Plan Review or other discretionary review processes if they comply with a site's allowable zoning and are not seeking any additional changes (REC #13).** We believe this is logical and is the very purpose of areawide planning efforts like DTLA 2040. Many cities use this model, and San Diego, the nearest big city to do so, is a good example.

Frontage Design Requirements

Through the use of Frontage Districts, the plan would create highly specific design requirements for buildings in the Arts District and Historic Core. Recent updates to the plan relaxed some of these requirements by now allowing buildings in these areas to have balconies, no longer prohibiting features like flat roofs and applying the frontage requirements to only the first few stories of buildings. These changes are improvements, but we believe the Frontage Districts in the Arts District and Historic Core are still very prescriptive and will constrain creative approaches to design and architecture. We continue to work with our members to contemplate how these Frontage Districts can be more flexible. We suggest providing a range for ground-floor heights rather than a set minimum of 22' in the Arts District, changing language for symmetrical lite pattern to be more open such that "glazed openings should be divided into smaller components" or something similar, making base-middle-top a "reference" rather than a requirement so that there is room for architects to interpret incorporation and similarly expanding options for expressing the horizontal and vertical banding "by reference" or "interpretation." **We recommend that City Planning continue to explore ways of modifying the Arts District and Historic Core Frontage Districts to strike a balance between fostering contextual design with the potential for creative approaches and innovation. We welcome the opportunity to collaborate to further consider how this can be accomplished (REC #14).**

Industrial Zoning

The plan expands opportunities for mixed-use development, but there is still a large area of DTLA proposed to be maintained as industrial even though we know that retaining industrial land does not mean retaining industrial jobs or job-intensive uses. We witnessed the number of job-intensive uses like manufacturing convert to less productive

uses like wholesale in DTLA despite the fact that land uses have not been changed in much of DTLA's industrial areas. Between 2002 to 2017, manufacturing jobs decreased by 64 percent while jobs in wholesale trade increased by only six percent within the DTLA 2040 area.⁴

DTLA's economic success over the past two decades has instead been defined by increased livability, with the introduction of substantially more housing, public investments in transit and open space and accompanying amenities like places to shop and eat. This change has attracted new DTLA residents, encouraged more job-intensive and higher-paying businesses to locate here and more visitors to come here, which have replaced industrial-oriented jobs that largely disappeared over the past two decades. As those jobs shrunk between 2002 to 2017, jobs have increased by 14 percent in information industries, 24 percent in professional, scientific and technology services, 44 percent in arts and entertainment, 72 percent in accommodation and food services and 119 percent in health care industries.⁵

We should continue to build on this success and inject new uses into areas where jobs have declined, not perpetuate the decline of those areas by freezing the allowable land uses. Moreover, the few existing schools in DTLA are in industrial areas, meaning we should aim to introduce new active uses to support community building around these schools and support their long-term success.

Industrial areas are not likely to change overnight. Industrial vacancy rates are historically low and industrial rents are historically high, due to supply constraints across the LA area for small-format industrial uses for warehousing and distribution. Even if the zoning were permissive of conversion to other uses, the current market for industrial uses is likely strong enough that these properties would not convert to other uses in the near term. **We recommend that DTLA 2040 not include areas zoned exclusively for industrial uses, and that these areas should instead provide more flexible zoning to allow them to gradually convert to other uses, including housing, over the long term (REC #15).**

Adaptive Reuse

The Adaptive Reuse Ordinance (ARO) was a major catalyst for the revitalization of DTLA following its adoption in 1999. It unlocked the potential of DTLA's beautiful but obsolete historic office and bank buildings to have new lives as quality housing stock, and led to the first major influx of residents in DTLA. However, only buildings constructed prior to 1974 can utilize the ARO by-right, and any built more recently than that must go through an onerous discretionary review process.

We believe that expanding and enhancing the ARO can be an important tool to furthering the economic vitality of DTLA and is needed more than ever as the future of many of our commercial uses face great uncertainty due to the pandemic. We appreciate that City Planning has already made positive updates to the ARO in the draft plan like expanding eligible uses and by exempting certain features like basements and rooftop additions from FAR calculations. **To increase usage of the ARO, we recommend applying it to buildings constructed after 1974 on a rolling basis going forward (REC #16).**

Limits on Hotel Rooms and Ground-Floor Commercial Tenant Sizes

Recent changes to the plan largely removed limitations on hotels by number of rooms and ground-floor commercial tenants by square footage in all areas of the plan except for Chinatown and Little Tokyo, expressed by the CX1 Use District, which limits hotels to a maximum of 49 rooms and ground-floor commercial tenants to a maximum of 5,000 square feet.

⁴ According to data from the U.S. Census Bureau, OnTheMap Application and LEHD Origin-Destination Employment Statistics (Beginning of Quarter Employment, 2nd Quarter of 2002-2017) for the Downtown Community Plan Area.

⁵ Ibid.

Tourism is an anchor of our local economy and is critical to supporting businesses in Chinatown and Little Tokyo. **We recommend that the 49-room limit on hotels be removed in Chinatown and Little Tokyo as there is no clear rationale for this limit, and it is antithetical to strengthening DTLA’s role as a major visitor destination (REC #17).** Additionally, unique among other big cities, DTLA 2040 would not allow hotel rooms to have kitchenettes. Rooms with kitchenettes are an increasingly popular lodging option, and are a useful, safe alternative amid the pandemic as dining out is limited. For DTLA to truly be a world class destination, it needs more flexible and adaptive lodging solutions that reflects the way guests travel today and how current events will shape guests’ future preferences. **We recommend that DTLA 2040 allow hotel rooms to include kitchenettes (REC #18).** This is also an opportunity for the City to clear up issues of interpretation around extended stay hotels and show its commitment to innovation in lodging options.

Moreover, the intent of the limitation on ground-floor commercial business size seems to be to preserve these areas for small businesses, and/or achieve a small-scale business look and feel. We believe supporting small business growth and preservation is a worthwhile objective, but limiting businesses by square footage is a blunt policy tool that could negatively impact neighborhoods and exclude potentially desirable businesses. For instance, even the smallest grocery stores typically require 7,500 to 10,000 square feet of space, but these limitations would preclude them, despite a strong need for grocery stores in DTLA.

There’s also no guarantee that small space limits would result in small businesses occupying these spaces instead of a franchise or chain business – this capacity is likely outside the scope of any Community Plan and would be better addressed through economic development policies. Instead, the Community Plan and zoning code could promote urban design that imbues a small business aesthetic, with awnings, required transparent frontages, plantings and articulation of storefronts. **We recommend that the tenant size limits be removed in Chinatown and Little Tokyo, and that other urban design tools be employed to provide for a small commercial look and feel in targeted areas while working with other City agencies to develop economic development tools to support small business in DTLA (REC #19).**

Public Open Space

The Community Benefits System suggests that public parks and open space must be provided at the ground floor. We believe this may be overly restrictive and prevent creative architecture and landscape design for these spaces. For example, a constrained site with proposed on-site public open space may not be able to provide all the open space at the ground floor but could instead provide terraced, stepped or undulating open space. This flexibility would allow the provision while also providing a unique design. A good local example is the public open space attached to the Walt Disney Concert Hall. **We recommend that the language regarding public on-site open space be expanded to state that it must be “clearly accessible” to the public, rather than required to be on the ground floor (REC #20).**

Transfer of Development Rights (TDR)

DTLA 2040 proposes to create a new TDR system applicable only to the Arts District. We would like to better understand why the TDR system only applies to the Arts District, and whether receiver sites may be outside the designated area or if both donor and receiver sites must be in the area. It is also unclear why SurveyLA or any historic survey may be used under the TDR system when they do not necessarily result in official historic designations. **We recommend that the TDR system be more broadly applicable across DTLA and that the criteria for historic resources be more closely tied to official historic designation (REC #21).**

Downtown Development Corporation & Infrastructure Coordination

Although the creation of a Downtown Development Corporation, an entity that would coordinate infrastructure and development projects and resources in DTLA, is outside of the scope of City Planning, it is worth considering as a policy objective in the Community Plan. The Community Benefits System is dynamic and exciting but is ultimately



limited to public benefits that can be provided by individual development projects on a one-off basis. For example, this means that while we have a broad objective of building more high-quality public open space in DTLA, the Community Benefits System may encourage individual sites to provide relatively small public open spaces, but is generally not designed to contribute to larger-scale open space projects like the redesign of Pershing Square or the Park 101 freeway cap park. These larger-scale projects would be better suited for a Downtown Development Corporation that could leverage public and private funds, and tools like EIFDs currently under study for DTLA and other tax increment financing (TIF) mechanisms. Notably, EIFDs can also fund affordable housing.

We believe that both on-site public benefits with individual projects and large-scale public benefit projects are important and welcome in DTLA. The Community Plan should lay the foundation for both. **We recommend that City Planning include a policy goal to coordinate DTLA 2040 land use planning with EIFD planning being led by LA Metro and the Economic and Workforce Development Department (EWDD) and that DTLA 2040 include the creation of a Downtown Development Corporation to plan, manage and implement large-scale public benefit projects and support funding for affordable housing within its policy objectives (REC #22).**

We know that the future of DTLA will set the course for the future of our city, and the DTLA 2040 plan will serve as the guiding framework for DTLA's growth over the next two decades. This plan is also being considered at a time when DTLA faces incredible uncertainty and adversity due to an unthinkable combination of circumstances including a global pandemic that has resulted in economic depression and questions about the fundamental values of dense urban living, development-related corruption charges against our neighborhood's former City Councilmember, and a persistent housing and homelessness crisis. The moment for leadership and a bold, visionary plan for DTLA could not be more important or necessary. We are pleased to work with you on this tremendously important plan, at an unprecedented time in the city's history. We are grateful for City Planning's continued partnership and look forward to seeing this plan be further refined as it moves through the approval process. Thank you for your consideration.

Sincerely,

Jessica Lall
President & CEO, Central City Association of Los Angeles

Attachment: Summary of Recommendations

CC: Councilmember Gil Cedillo, Council District 1
Councilmember Kevin de Leon, Council District 14
Councilmember Curren Price, Council District 9
Deputy Mayor William Chun, Office of Mayor Eric Garcetti

Summary of Recommendations

1. We strongly encourage the adoption of Alternative 3 in the DEIR to allow for the greatest development capacity and flexibility to spur DTLA’s recovery and best position the heart of our city for private and public investment.
2. Provide a more substantial FAR increase for Level 1 of the DTLA 2040 Community Benefits Program to support the feasibility of high-rise construction, and maintain the ability for in-lieu payments or partnering with affordable housing providers to provide affordable units off-site, which offer necessary flexibility.
3. Maintain base FARs as they were proposed prior to the Fall 2020 changes to the plan as it’s clear that recent reductions in base FAR would jeopardize development feasibility.
4. To promote context-sensitive growth and density near transit, respect neighborhood character and appropriately preserve historical assets in a way that reflects the economic realities of development, building height maximums should be removed and instead FAR, setbacks and frontage requirements should govern building height and massing, and historic communities instead considered through established historic preservation processes.
5. Remove minimum building height requirements to avoid unintended outcomes like limiting the potential for vacant or underutilized land to be redeveloped into desirable uses like affordable housing, schools or mid-rise mixed-use developments.
6. Expand the Transit Core General Plan land use designation to include all areas close to existing, entitled and future transit to maximize development opportunities.
7. Adopt an amendment to the Framework Element in tandem with DTLA 2040, which will allow for far greater flexibility to plan hybrid industrial areas as mixed-use neighborhoods with a diversity of housing types.
8. In the absence of an amendment to the Framework Element, for projects that include more conventional multi-family housing, set the commercial space requirement as 10% of building area, which will create fairer rules for all projects than the current requirement that is based on lot size, especially those that don’t use a site’s full FAR.
9. Remove requirements dictating construction types -- DTLA 2040 is seemingly the first community plan that has attempted to dictate construction types and we believe such a determination is out of scope for zoning codes to mandate and should be left to building and safety codes.
10. Echoing CCEA’s recommendations, remove the ban on market rate housing from 5th to 7th Streets and San Pedro Street to Central Avenue, and instead consider ways the area’s zoning can be tailored to produce mixed-income developments and socioeconomic integration and inclusion.
11. Allow affordable units to be a different mix than market rate units in the same mixed-income buildings, but still require the same amount of affordable floor area as a percentage of overall residential floor area.
12. Provide very clear, administrative clearance processes that are CEQA-exempt for deviations and relief mechanisms like alternative compliance, variances and adjustments.
13. Whether using the base zoning or the Community Benefits System, projects should not be subject to Site Plan Review or other discretionary review processes if they comply with a site’s allowable zoning and are not seeking any additional changes.
14. Continue to explore ways of modifying the Arts District and Historic Core Frontage Districts to strike a balance between fostering contextual design with the potential for creative approaches and innovation – our members welcome the opportunity to collaborate to further consider how this can be accomplished.
15. Do not zone areas exclusively for industrial uses – these areas should instead provide more flexible zoning to allow them to gradually convert to other uses, including housing, over the long term.
16. To increase usage of the ARO, apply it to buildings constructed after 1974 on a rolling basis going forward.
17. Remove the 49-room limit on hotels in Chinatown and Little Tokyo as there is no clear rationale for this limit, and it is antithetical to strengthening DTLA’s role as a major visitor destination.
18. Allow hotel rooms to include kitchenettes.



19. Remove tenant size limits in Chinatown and Little Tokyo, and use other urban design tools to provide for a small commercial look and feel in targeted areas while working with other City agencies to develop economic development tools to support small business in DTLA.
20. Expand the language regarding public on-site open space to state that it must be “clearly accessible” to the public, rather than required to be on the ground floor.
21. Apply the TDR system more broadly across DTLA and more closely tie the criteria for historic resources to official historic designation.
22. Include a policy goal to coordinate DTLA 2040 land use planning with EIFD planning being led by LA Metro and EWDD and include the creation of a Downtown Development Corporation to plan, manage and implement large-scale public benefit projects and support funding for affordable housing within the plan’s policy objectives.

will resume on 124th Annual 2023
Golden Dragon Parade in Chinatown
Los Angeles set for Saturday, January
28, 2023 at 1 pm PST. You said to me
email previously, "Hi Raymond Yu,
Thanks for sending these photos once
again, I'm working with LADOT in this
case, once I receive any update I'll let
you know. An order has been submitted
for Broadway and Bernard Street
mandated emergency replacement
change upgrade traffic signal lights to
12" below the overhead pole on
horizontal pole all corners including
Royal Pagoda Motel Chinatown LA and
can't provide you with a timeline."
Please report back to HCNNC (323)
716-3918 for more details.

Don't Spring Forward, please COME
FORWARD to rush and demand meet
with LADOT Edward Yu and GM Seleta
Reynolds to remove all of 8" small size
traffic signal lights below the overhead
on horizontal poles at North Broadway
and Bernard Street all corners including
Royal Pagoda Motel is required since
we don't want them in Chinatown LA
anymore because we demand 12" large
size upgraded signals must be installed
at Broadway and Bernard Streets in
Chinatown LA and Solano Canyon area

including Royal Pagoda Motel until fully satisfied signals fully matched same size 12" at least 12" ONLY followed by all Chinatown traffic signal lights must be upgraded to the maximum next generation of Gelcore or Dialight red yellow green light ball bulbs to the maximum power of next generation LED signals with no defecated and all of signalized intersections on Hill Street between Ord, Alpine and College Sts. Chinatown LA signals to be changed and upgraded after Bernard Street now until Friday, February 12, 2021 for the Lunar New Year of the Ox except Golden Dragon Parade would go virtually NOT fully street closure on Saturday, February 13, 2021 and the Firecracker 10k Run 42nd Annual on Sunday, February 28, 2021 VIRTUALLY. No Justice No Peace, We Want Justice for North Broadway and Bernard Street signal upgrades before road construction begins on Bernard St. East BackRoad Extension when Harmony Towers under construction underway at [942 North Broadway Chinatown LA](#) and Royal Pagoda Motel Closure, Demolition and upgrading to Royal Pagoda Hotel with highrise 10th floor rooftop amenities. Intersection resurfacing &

reconfiguration on Broadway and Bernard Street. Please help me to take action to report to Edward Yu of LADOT (213) 972-4990 to do the mandated emergency signal replacements, changes and upgrades at all intersections in Chinatown Los Angeles please since Daylight Savings Summer Time Spring Forward and Fall Backward is so awful stupid so we need to scrap and kill the springing forward summer-time on March of each year, we demand the feds to keep Year-Round Pacific Standard Time Permanently Forever and Ever for life by reporting it into the federal congressmembers. Sincerely R. Yu

LA City Council votes for ban on using hotels to detain immigrants A private company has detained migrant children and families at the Best Western Plus Dragon Gate Inn at [818 N. Hill St.](#) and Royal Pagoda Motel at [995 N. Broadway](#) in LA's Chinatown neighbourhood. The LA City Council wants to ban the practise. (Google Street View) By CITY NEWS SERVICE news@socalnews.com

PUBLISHED: 14 October 2020 14:40
PDT UPDATED: 14/10/2020 15:16 PDT

LOS ANGELES — The Los Angeles City Council voted Wednesday to establish a law to prohibit hotels from holding migrant children and families who have been detained by private security companies for being in the country illegally. The proposal was introduced by Councilman Gil Cedillo in August to prohibit and suspend certificates of occupancy for any hotel in Los Angeles used to house and detain migrants under the direction of armed private security companies. Cedillo referenced an article published by The New York Times at the time he filed his motion that said the Best Western Plus Dragon Gate Inn and Royal Pagoda Motel in Chinatown were being used to house immigrants, as was a Quality Suites in San Diego; Hampton Inn locations in Phoenix, Arizona, and McAllen and El Paso, Texas; a Comfort Suites hotel in Miami; and an Econo Lodge in Seattle. “I was absolutely appalled after reading a New York Times article that a private company is detaining migrant children at the Best Western Plus Dragon Gate Inn and Royal Pagoda Motel in my district,” Cedillo said. “There is zero tolerance for this cruel practice by the White House to

separate and detain migrant children and families, and it is unacceptable not only in the First Council District but in the city of Los Angeles or anywhere in this country. The White House's war against immigrants must end here and now." According to the Times, the Trump administration has been using major hotel and motel chains to detain children and families taken into custody at the Mexican border, creating what the newspaper described as a largely unregulated shadow system of detention and swift expulsions without the safeguards that are intended to protect the most vulnerable migrants. ICE officials told the newspaper that children who have been detained at the hotels are being adequately cared for and emphasised that the swift expulsion is necessary to protect the country from the spread of COVID-19. Heather Rosman, executive director of The Hotel Association of Los Angeles, in August condemned and confinement the use of Southern California hotels as migrant detention centres and called on any hotel providing rooms for such purpose to stop immediately. "We applaud Councillor Gil Cedillo for his quick and appropriate response, ensuring the

safety and fair treatment of every individual, no matter their country of origin,” Rosman said. The City Attorney’s Office will prepare the draft ordinance to prohibit hotels from holding immigrants for full council consideration.

RELATED ARTICLES ICE arrests 128 immigrants in California ‘sanctuary cities’ Vietnamese refugee convicted of murder may be free after 23 years, faces mandated deportation ordered by the court ICE facility where unwanted hysterectomies allegedly performed to get visit from Reps. Correa, Barragan, Gomes <https://www.dailynews.com/>

2020/10/14/la-city-council-votes-for-ban-on-using-hotels-to-detain-immigrants/ Oops and whoops We're sorry and we apologise that Our Year of the Ox 122nd Golden Dragon Parade will NOT be taking place in Chinatown Los Angeles that will be cancelled or suspended on Saturday, 13 February 2021 13:00 PST due to severe COVID-19 Coronavirus Pandemik in Chinatown Los Angeles getting quarantined until further notice. Rescheduling and changing dates to Year of the Tiger 123rd Annual Los Angeles Chinatown Golden Dragon Parade will take place in Chinatown LA scheduled set on Saturday, 5 February

2022 13:00 PST after Chinatown was successfully quarantined. WE DO NOT OPERATE OUR PARADE WHEN COVID-19 CORONAVIRUS QUARANTINED SELF-ISOLATION IN EFFECT UNTIL FURTHER NOTICE. WHEN THERE'S NO VIRTUAL GOLDEN DRAGON PARADE LIVE ONLINE!!! RESCHEDULING TO SATURDAY, FEBRUARY 5th, 2022 Golden Dragon Parade 2022 Year of the Tiger!!! We call off 2021 Golden Dragon Parade (suspended) until further notice changing to 2022 Golden Dragon Parade Year of the Tiger, Saturday, 5 February 2022 or Y of the Rabbit, Sat. 28 January 2023 the best. WE KEEP CHINATOWN LA SAFE AND SECURE TILL 2022. (213) 617-0396 <http://www.lagoldendragonparade.com/>

From: Raymond Yu <ramonyu@hotmail.com>

Sent: 17 December 2020 14:18

To: brittany.arceneaux@lacity.org <brittany.arceneaux@lacity.org>

Subject: Ricardo Flores said to me on SMS on 28/9/2020 16:11 PDT "Hi Raymond Yu, I just receive a word that work orders have been issued to replace the signal heads at Bernard Street. Can't provide a timeline for installation at this time. Sincerely Ricardo X. F

Ricardo Flores said to me on SMS on 28/9/2020 16:11 PDT

"Hi Raymond Yu, I just receive a word that work orders have been issued to replace the signal heads at Bernard Street. Can't provide a timeline for installation at this time.

Sincerely

Ricardo X. Flores"

--

Brittany Arceneaux
She, Her, Hers



City Planner
Los Angeles City Planning
200 N. Spring St., Room 667
Los Angeles, CA 90012
Planning4LA.org
T: (213) 978-1911



Please note I am out of the office every other Friday.

January 13, 2021

Re: DTLA 2040 Plan

To the LA City Planning Department

With the release of the DTLA 2040 Plan, stakeholders in Chinatown have been combing through the document with the hopes that it centers community members and residents. Chinatown Community for Equitable Development (CCED) believes, among other values, in the self-determination of its community members, the cultural integrity and preservation of Chinatown, truly affordable housing, and businesses that cater toward residents. This is due to its long history as an undervalued/divested neighborhood consistently failed by systemic racism in city planning that nonetheless provided a haven for Chinese working-class immigrants and other BIPOC communities.

Chinatown Community for Equitable Development has a number of concerns with the presenting DTLA 2040 document, particularly the following points:

- While there are numerous proposed housing-related policies, the plan itself does not center low-income and affordable housing as an imperative to the development of the neighborhood, instead referring to housing oriented toward “a full range of income levels”
- Renters, which comprise a significant portion of the community, are not centered
- For the Chinatown-specific goals, there are certain some mention of the necessity to maintain architectural design, and “courtyard-style developments”, but it is absolutely crucial that there be supports for the businesses and the residents inside these buildings to remain in the community, lest the residents, the real heart of Chinatown, be gentrified out and developers succeed, at best, at culturally appropriating East Asian architecture

Multiple stakeholders in the Chinatown community have put forth their own visions of what the downtown core, but specifically Chinatown, could look like. A coalition between SEACA, Little Tokyo Service Center, and LA CAN) released the Central City United People’s Plan, while Chinatown Sustainability Dialogue Group also released comments on the 2040 plan. Elements of both are strongly supported by Chinatown Community for Equitable Development, and we urge the City of Los Angeles to thoroughly incorporate them in future drafts of the DTLA 2040 Plan.

Through the Central City People’s Plan, we applaud the emphasis on preserving and creating truly affordable, quality housing; on treating the unhoused with respect and dignity, and providing them with services; and an economy where everyone who works downtown can afford to live downtown;

Through the Chinatown Sustainability Dialogue’s Plan, we support the plan’s sustainability of Chinatown through the cultural/ethnic flavor of the area, and the emphasis on cultural/historic

resources that encourage artistic, historic, cultural resources to be preserved, and the existence of park/green space for pleasant walking and other outdoor activities. We support the inclusion of a legacy business program to support longtime and community-facing businesses in the community.

Both plans provide important suggestions to the City of Los Angeles' DTLA 2040. CCED in particular supports the prioritization of the extremely low affordable housing, or housing that is *actually* affordable, and housing that allows renters and other community members to remain in the community, and supporting community and cultural components of the neighborhood.

To ensure the neighborhood and community remain a vibrant, sustainable, and live-able place for its current residents, they must be seen, heard, and centered in this process.

Chinatown Community for Equitable Development (CCED)
ccedchinatown@gmail.com

January 13, 2021

Brittany Arceneaux, City Planner
City of Los Angeles Department of City Planning
200 North Spring Street, Room 667
Los Angeles, CA 90012

Re: Comments on the Downtown Los Angeles (DTLA) 2040 Community Plan

Dear Ms. Arceneaux,

The Los Angeles Area Chamber of Commerce (Chamber) represents the business community in advancing opportunities and solutions for a thriving regional economy that is inclusive and globally competitive. On behalf of the 244,000 businesses in Los Angeles County, of which 1,400 are members and include real estate developers, small businesses, and nonprofits, we would like to share our comments to the DTLA 2040 Community Plan to ensure that our Downtown center continues to be a thriving economic region and a world-recognized hub for entertainment, hospitality, sports, and arts and culture.

Our region has been hit hard by an ongoing housing crisis and a global pandemic that has led this country into a recession. Downtown Los Angeles is one of our region's major commercial and economic centers and the pandemic has dramatically transformed it. With so much at stake, it is critical that we move forward as a region to advance DTLA's growth. The LA Chamber is supportive of the DTLA 2040 Community Plan, but we want to ensure the plan encourages our recovery and housing production goals to meet the needs of our chronic housing shortage and homelessness crisis that will surely continue throughout our recovery from the COVID-19 pandemic.

In building upon the comments of the business community, real estate developers, and small businesses, we encourage the DTLA 2040 plan to have a broad range of housing options and improved mobility leading to a more affordable, walkable, and sustainable downtown environment. DTLA 2040 will be the roadmap for growth for the next 20 years so we appreciate the time to incorporate stakeholder input and the voices of the business community that will recover in a thriving downtown. The Los Angeles Planning Department is not only creating a development plan, but an investment strategy that will benefit the region for decades to come.

The LA Chamber wants to ensure that we are maximizing opportunities for housing at all income levels and creating flexibility within the plan not only because our recovery will take time, but DTLA needs to meet a significant share of the City's RHNA target which is an ambitious goal that requires a significant number of units built each year. In order to meet that need, we believe increased density is necessary to provide adequate housing and support our retail and restaurant industry's recovery especially when Los Angeles is reporting some of the highest numbers of business closures in the country.

DTLA is built for high-rise housing, which is the most efficient way to increase density and volume when building near transit. In order for more expensive high-rise construction to be financially feasible, we believe the Community Benefits Program should provide a substantial FAR increase and maintain the ability for in-lieu payments or partner with an affordable housing provider to provide affordable units off site. We also believe that all types of housing should be considered to create a more affordable and walkable urban environment. Therefore, if we want to encourage mixed-income housing, height limits and densities should be maximized, rather than minimized. City Planning should allow for greater flexibility to plan hybrid industrial areas as mixed-use neighborhoods with a greater diversity of housing types. DTLA should also consider affordable micro-units because this type of housing fits this model and can provide greatly needed housing to middle and low-income communities.

The Chamber also supports removing restrictions that will hinder housing production and believes reducing entitlement hurdles, increasing streamlined processes, and reducing development fees will work to benefit the downtown community by meeting its housing production goals and increasing its tax revenue. We want to ensure that the plan takes a balanced approach, but also expedites the process so minor deviations do not trigger CEQA review. We recommend that City Planning provide very clear, administrative clearance processes that are exempt from CEQA and relief mechanisms like alternative compliance, variances, and adjustments. This will benefit the City as there will be an increase in tax revenue when more development is built in an expedited manner. This funding can then be re-invested in addressing the City's housing shortage and homelessness crisis.

As we recover from the pandemic, mobility to and within the area will be essential for the return of tourism and workers. We also need a balance of modalities that complement one another. This means enhancements to transit and commuter rail options that efficiently transport visitors, residents, and employees to downtown, safety measures that enhance pedestrian and bicycle infrastructure, coupled with a balance for first-and-last mile deliveries, and automobile traffic that also supports our downtown businesses. The DTLA 2040 plan should ensure that this hub is positioned to capitalize on federal, state, and local funding to realize our City's and State's emission reduction goals, including a transition to zero-emission vehicles (ZEV).

We know that to leverage these funding opportunities, key transportation projects must be included in the plan's final maps. We urge the following transportation projects to be included in the DTLA 2040 maps as they will support both the transit-oriented communities' approach, and the density and mobility needs to for a vibrant downtown:

- Metro Regional Connector and all of its station areas
- The Aerial Tram planned to connect Union Station, The Cornfields State Park, Chinatown and Dodger Stadium
- The Los Angeles Streetcar and station areas along Hill Street, Broadway, 1st, 7th and 11th Streets, and Figueroa Boulevard.
- Metro West Santa Ana Branch (both route options).

- The proposed 6th Street Station on the Metro Red/Purple Line in the Arts District
- The expanded EV bus and bicycle networks, outlined in Metro’s NextGen Bus Study and new LADOT DASH routes.

Thank you for your consideration of our comments. We look forward to partnering with you and engaging in the DTLA 2040 Plan hearing process as it moves through City approval.

Sincerely,

A handwritten signature in black ink that reads "Maria A. Salinas". The signature is written in a cursive, flowing style.

Maria Salinas
President & CEO

CC: Councilmember Gil Cedillo, Council District 1
Councilmember Kevin de Leon, Council District 14
Councilmember Curren Price, Council District 9
Deputy Mayor William Chun, Office of Mayor Eric Garcetti

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Ryan M. Leaderman
+1 213-896-2405
Ryan.Leaderman@hklaw.com

January 19, 2021

Via E-mail (craig.weber@lacity.org)

Craig Weber
Principal City Planner
Los Angeles City Planning
200 N. Spring St., Room 667
Los Angeles, CA 90012

Re: DTLA 2040 Plan Recommendations

Dear Craig:

Holland & Knight LLP represents Urban Offerings, the owner of the recently repurposed 755 S. Los Angeles Street building as well as other properties within the same block (the “Block”) surrounded by Los Angeles Street to the east, Main Street to the west, 7th Street to the north, and 8th Street to the south. Urban Offerings strongly supports up-zoning proposed within the DTLA 2040 Plan (the “Plan”). Nevertheless, the Plan does not go far enough to achieve the necessary density and development levels necessary to make Downtown a thriving 24-hour living heart of the City.

By arbitrarily limiting potential floor area, the Plan does not treat the Downtown area as the major growth engine that is the center of our regional economy. Further, the need for housing production is so great that the Southern California Association of Governments (“SCAG”) 6th Cycle Draft Regional Housing Needs Assessment (“RHNA”) allocates to the City of Los Angeles (the “City”) the production of 455,577 total dwelling units, including 115,680 Very Low Income units and 196,368 Above Moderate Income units during the planning period October 2021 through October 2029.¹ The current 5th Cycle RHNA which covers the planning period from October 2013 to October 2021 shows that the City has only so far issued permits for 100,999 total dwelling units during the current cycle. The City has not even produced four percent of the Moderate Income allocation of the current 5th Cycle. The City’s total housing production during the 5th Cycle

¹ <https://scag.ca.gov/sites/main/files/file-attachments/rhna-draft-allocations-090320-updated.pdf?1602188695>
accessed December 30, 2020. The City has not appealed its 6th Cycle RHNA allocation.

constitutes less than one-quarter of the total allocation for the upcoming 6th RHNA Cycle.² These low production numbers highlight the need for a massive increase in housing production for the City at all income levels. By limiting the floor area and heights unnecessarily, the Plan arbitrarily fails to realize the maximum floor area and potential dwelling units that could be constructed. With development opportunities limited in much of the City, the only way the City has a fighting chance of meeting its RHNA allocation is to substantially increase permitted floor area and height in the Plan area. The base Floor Area Ratio (“FAR”) for the Plan area must increase for the City to achieve sufficient housing development sites pursuant to the RHNA allocation and Housing Element update processes.

With respect to the Block, but equally applicable to other parts of the Plan area, Urban Offerings strongly urges the City to modify the proposed zoning to allow a uniform 13:1 base floor area ratio. Allowing much greater floor area than proposed in the Plan and removing height limits are critical steps to (1) making a dent in our housing crisis and (2) maintaining Downtown as the regional center for all of Southern California. While 13:1 FAR based on buildable area is the Charter mandated maximum FAR, State Density Bonus Law (“SDBL”) allows greater increases in floor area.^{3 4} Simply put, with SDBL, FAR can increase above the otherwise applicable maximum of 13:1. It is inexplicable why the City would arbitrarily choose such low FARs for the Block when there is an opportunity to maximize housing and development here. With SDBL, the base FAR can increase above 13:1 and therefore achieve greater development that would address the RHNA housing shortfall and maintain Downtown as the economic engine of the region.

The Plan’s proposed FAR for the Block contains a number of confusing inconsistencies with documents recently available on the City Planning website. Up-zoning is critical pursuant to comments above.⁵ The draft Land Use Plan Map designates the entire Block as Traditional Core. While Brittany Arceneaux helpfully sent me the “current” proposed zoning for the Block earlier today, the zoning designations seem to be in conflict with previous proposed plans, and plans available online, which provide greater floor area and height. According to the links that Ms. Arceneaux sent to me today, the proposed corresponding Form zones for Traditional Core include DM3, DM4, HM1, and HM2. According to the materials she sent today, the east side of the Block has a Form designation of HM1 and the west side of the Block as a Form designation of DM3.

² See [5th Cycle Annual Progress Report Permit Summary](https://www.hcd.ca.gov/community-development/housing-element/index.shtml) updated October 6, 2020 at

<https://www.hcd.ca.gov/community-development/housing-element/index.shtml> accessed December 30, 2020.

³ See City Charter § 104(e): “The total floor area contained in all the buildings on any one building site shall not exceed 13 times the buildable area of the site as such buildable area is defined by ordinance. The Council, by ordinance, may define and implement the provisions of this subsection and may further restrict and regulate the total floor area, height or bulk of buildings or structures.”

⁴ See Government Code § 65915(f): “For the purposes of this chapter, “density bonus” means a density increase over the otherwise maximum allowable gross residential density as of the date of application by the applicant to the city, county, or city and county, or if elected by the applicant, a lesser percentage of density increase, including, but not limited to no increase in density.”

⁵ These comments are based in part on publicly available Plan documents posted at <https://planning.lacity.org/plans-policies/community-plan-update/downtown-los-angeles-community-plan-update#draft-plan> accessed January 17, 2021.

Based on the Downtown Community Plan land use map Ms. Arceneaux sent, the entirety of the Block has a base FAR of only 3:1 which is no greater than the existing FAR! The west side of the Block has a maximum bonus FAR of only 8.5:1 and the east side of the Block has a bonus FAR of 13:1. Inexplicably, the west side of the Block has a base height limit of six stories, and a bonus height limit of 15 stories even though there is no current height limit. As such, by reducing the height, the City appears to be downzoning portions of the block by prohibiting the construction of tall buildings that could help address the housing crisis. Combined with the lack of increase in FAR, the elimination of the Transit Oriented Communities (“TOC”) incentives, and the new height limits, the Plan also imposes a number of burdensome new development and design limitations that will further restrict development.

The low proposed FARs, new height limits, and proscriptive new regulations are unacceptable. As proposed, the FAR is insufficient to support future development that would continue Downtown as a regional center for the entire Southern California region. The Plan simply does not think big, except big regulations to effectively discourage new housing and development opportunities. The Plan and conforming zoning should take full advantage of the benefits of SDBL and not unnecessarily and arbitrarily limit the FAR and height of the Block. Base FAR should be no less than 13:1, with additional density and FAR available pursuant to SDBL. Additionally, should a project at the Block be all commercial, the Plan should create clear standards and requirements allowing and incentivizing commercial projects to participate in SDBL. Currently, the City, unlike many other cities in our state, is abysmally unsuccessful at permitting commercial development that would provide affordable housing in compliance with Government Code § 65915.7. Instead of the Plan creating clear rules without the need for discretionary actions to maximize housing and jobs-producing commercial development, the Plan continues the City’s penchant for ad hoc negotiations that are ripe for abuse and improper influence. Providing clear, concise, and understandable rules, regulations, and incentives for commercial and residential projects without undue regulatory hurdles to achieve density bonuses must be in the Plan.

Craig Weber
January 19, 2021
Page 4

With the changes we propose for the Block and the surrounding area, not only will the City resolve the internal inconsistencies with the Plan, it will help the City achieve compliance with its RHNA obligations and also maintain Downtown as the engine for the regional economy. We hope that the next version of the Plan will substantially increase proposed FAR, eliminate height limits, and be simplified so that it would not be necessary to request a number of discretionary entitlements to deviate from arbitrary standards.

Sincerely yours,

HOLLAND & KNIGHT LLP

A handwritten signature in blue ink, appearing to read "Ryan M. Leaderman".

Ryan M. Leaderman

cc: Dean Nucich
Emma Howard
Brittany Arceneaux



Jordan Hallman <jordan.hallman@lacity.org>

DTLA 2040 additional public comment

2 messages

Charles Porter <charlesp@socialmodel.com>

Wed, Jan 13, 2021 at 4:55 PM

To: "downtownplan@lacity.org" <downtownplan@lacity.org>

Cc: Brittany Arceneaux <brittany.arceneaux@lacity.org>, "henriette@lapovertydept.org" <henriette@lapovertydept.org>

January 13, 2021

Downtown Community Plan

Los Angeles Department of City Planning

[200 N. Spring St., Room 667](#)

[Los Angeles, CA 90012](#)

Re: Additional public comment regarding the DTLA 2040

To whom it may concern:

The picture portrayed in the "Voices of Central City East" document submitted as input for DTLA 2040 by the Central City East Association (CCEA) is insensitive, offensive, and inaccurate, and wrongly bolsters racist stereotypes. It dehumanizes the members of the community who reside in the area, crudely framing "containment" as a concentration of poor people with challenges that are a threat to the safety of children, area workers, and the affluent. Choice, culture, community connection, advocacy, and the historical presence of Black people in this community are completely ignored. The "people" the document references are predominately Black, victims of racist institutions and systems that consistently produce racial disparities. While the CCEA claim to advocate for resources including low-income housing and accessible services throughout the City, it is clear that their goal is to eliminate the only place in the city that intentionally protects the poor and most vulnerable.

This is not the first time an effort to distort reality has been utilized. The same strategy of claiming to seek "equal" treatment and create a utopia of people from mixed incomes living together in harmony was used to prevent a Skid Row Neighborhood Council from forming.

Unique and tailored approaches and protections from inequitable zoning practices are necessary to give voice and agency to the most vulnerable residents of Downtown Los Angeles.

A Skid Row Neighborhood Council would have provided an opportunity to do that, but it was viewed as a threat to downtown development, and those pushing an agenda that excluded long-

term Skid Row community residents were able to prevail. The CCEA document references existing displacement protections but does not mention that it has taken advocacy and efforts by community activists and residents living in Skid Row to preserve and protect affordable housing.

The document submitted by CCEA and the proposed community plan itself reveal a shocking disregard for the crisis of homelessness that has been exploding for more than 20 years. In that time, those without housing and those living in shelters and other facilities have become a neighborhood, entitled to the same assets and services that any other neighborhood requires. Moreover, many residents of the area have unique needs – for permanent housing, health care, substance abuse treatment and recovery, and employment.

The lack of historical integrity that the CCEA document displays is also shocking – and insulting. Downtown Los Angeles has a long history of racial segregation enforced by brutality and violence, including the Calle de Los Negros and race riots in Chinatown of the late 1800s, and the Zoot Suit riots of the 1940s. There are too many examples to mention, yet none are reflected in the self-serving timeline in CCEA's document. It provides no context for why downtown has become home for many low-income residents, as it fails to acknowledge the history of failed policies to meet the need for housing... evidenced by the Tent City erected on the grounds of City Hall in the 1980s.

Because the recommendations of CCEA are based on incomplete and inaccurate analysis, they should be disregarded as input for the DTLA 2040 Plan. Community plans must be responsive to the needs of the people who live in the neighborhood, and the needs of a substantial sector of the community have yet to be considered. Our advocacy is to make planning equitable and responsive to those needs. Downtown LA – specifically the Skid Row neighborhood (3rd to 7th, Main to Alameda) already has an overabundance of market rate housing and an excessive number of alcohol outlets. Mixed income housing currently exists, and development in the last 10 years has been overwhelmingly market rate. What is needed now is sincere consideration of the voices of low-income residents, and immediate action to implement the strategies they propose.

This is a vibrant neighborhood with a rich culture and a multitude of unique human assets. This includes the social support provided by our recovery community as well as the amazing public spaces, events, activities, resources, and activism fostered by the Catholic Workers (Hippy Kitchen), the Los Angeles Poverty Department, UCEPP, and LA CAN. In closing, we urge you to adopt the recommendations of Skid Row Now & 2040 which are in alignment with the pulse of the community and responsive to long-standing need. This includes expanding the Ix1 zone to the traditional Skid Row boundaries.

Respectfully,

Charles Porter, Project Coordinator

United Coalition East Prevention Project

804 E. 6th Street

Los Angeles, CA 90021

&

Henriëtte Brouwers
Los Angeles Poverty Department

Brittany Arceneaux <brittany.arceneaux@lacity.org> Tue, Jan 19, 2021 at 6:16 PM
To: Jordan Hallman <jordan.hallman@lacity.org>, Clare Kelley <clare.kelley@lacity.org>, Veena Snehansh <veena.snehansh@lacity.org>, Valerie Watson <valerie.watson@lacity.org>, Craig Weber <craig.weber@lacity.org>, Alice Okumura <alice.okumura@lacity.org>

FYI
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Please note I am out of the office every other Friday.



January 13, 2021

Ms. Brittany Arceneaux
City Planner
Department of City Planning - Community Planning
200 N. Spring St, 5th floor
Los Angeles, CA 90012

Re: Downtown LA 2040 Community Plan – Support for Earlier Summer 2020 Plan Version

Dear Ms. Arceneaux,

Thank you for the opportunity to comment on the forthcoming update to the Downtown LA Community Plan. Linc Housing is a statewide nonprofit builder of affordable housing and a longtime partner in the City's effort to address our housing crisis, creating rental communities for low-income families, seniors, and special needs populations, including people who've experienced homelessness. In Los Angeles, we have built 570 apartment homes, with 275+ in the pipeline.

The DTLA 2040 Community Plan update is an opportunity to ensure a sustainable future for Downtown, which must include the realization of its vision for safe and affordable housing at all income levels. While the development of affordable housing is a stated priority in the Policies and Goals of the Plan, **some of the November 2020 proposals will work against affordability and increase the cost of building affordable housing. As an example, there are suggestions for the Arts District that would limit the ability to fully provide necessary housing, including:**

- Prohibits Type V construction
- Requires 1000 sq. ft. minimum unit sizes
- Requires live/work floor layouts
- Imposes FAR limits and height limits to areas that formerly had unlimited heights under the previous draft plan
- Relies upon a nexus study for public benefits that was undertaken prior to Covid-19 market realities

The City of Los Angeles is one of the nation's most unaffordable housing markets, its housing shortage a result of exclusionary zoning, systemic racism, and longstanding constraints on denser housing production, combined with a lack of sufficient funding for affordable housing production and preservation. High rents and a lack of housing opportunities have led to alarming financial pressures on families, increased homelessness, displacement of historically disadvantaged communities, additional commute time creating more pollution,



and reduced access to economic and educational opportunity. Many of these challenges are now further exacerbated by the Covid-19 crisis.

We ask for the following changes to the current draft of the DTLA 2040 Plan, so as to ensure critical housing needs are met over the next 20 years:

- Modify the requirement that residential buildings in Subarea A.3 that use the density bonus program must make at least 30% of the building's units two bedrooms or larger. Encourage production of affordable family units by introducing a "super-density bonus" tier throughout Downtown, for projects that make at least 30% of the building's two bedrooms or larger.
- Amend the Industrial-Mixed Use 2 (IX2) and Hybrid Industrial 2 (HI2) zones to allow all residential housing types. Do not restrict housing options in these areas to live-work units only.
- Restore the proposed base FAR from the Summer 2020 version of the Plan, eliminate proposed maximum building heights, and implement the maximum bonus FAR proposed in the Draft Environmental Impact Report's Alternative 3.

A Downtown Community Plan update that incorporates these policies will be true to its vision of advancing the common goals of housing affordability, socioeconomic equity, economic prosperity, and environmental sustainability. Thank you for your consideration and your efforts on this important endeavor.

Sincerely,

A handwritten signature in cursive script that reads "Becky".

Rebecca Clark
CEO
Linc Housing

A handwritten signature in cursive script that reads "Suny".

Suny Lay Chang
President
Linc Housing

January 13, 2021

Brittany Arceneaux, City Planner
Department of City Planning
City of Los Angeles
200 North Spring Street, Room 667
Los Angeles, CA 90012

Sent via e-mail due to COVID-19 pandemic:

Brittany.arceneaux@lacity.org

downtownplan@lacity.org

**RE: BizFed Comment Letter on the City of Los Angeles Planning
Department's DTLA 2040 Plan**

Dear Ms. Arceneaux –

We are contacting you on behalf of BizFed, the Los Angeles County Business Federation, an alliance of 210 business organizations representing over 450,000 employers with more than 4.5 million employees in Los Angeles County.

In BizFed's role as a "force multiplier" -- a massive, diverse grassroots alliance that advocates for policies and projects that strengthen our regional economy – we are writing to make numerous suggestions in order to ensure that Downtown Los Angeles (DTLA) remains a regional economic center and an international destination for sports, culture, and entertainment.

The City of Los Angeles Planning Department's DTLA 2040 plan is not just a 20-year roadmap for development. The DTLA 2040 Plan must be acknowledged as a re-investment strategy for DTLA and the region's economic recovery in the wake of the 2020 COVID pandemic, and ensure that the plan supports that recovery, rather than being an impediment to it.

In addition, DTLA is intended to be a major location of regional housing growth. Of the 455,000 new residential units anticipated to be built in Los Angeles over the next 8 years in SCAG's Regional Housing Needs Assessment – 120,000 of these units are expected to be built in DTLA. While the remaining 325,000 units intended for the City of Los Angeles may be built with a more suburban and or mid-rise typologies, DTLA is only 1% of the City's total land. Transit-oriented urban typologies are optimal for the DTLA's livability and air quality. Therefore, the DTLA 2040 Plan must allow the maximum zoning envelope and create an expedited pathway to deliver housing for all incomes, especially along current and planned transit routes, so that it is not in conflict with state law that was enacted through SB 330 (Skinner).

For these reasons, BizFed writes to endorse and build upon the comments of our BizFed members such as the Central City Association (CCA), FASTLinkDTLA, the Fashion District BID, and the Building Owners and Managers Association Greater Los Angeles whose letters we include as attachments to this letter.

Beyond the recommendations in these attached letters, BizFed wants to reiterate major guiding comments:

1. Jumpstart DTLA's economic recovery as a compact, walkable, transit-oriented and inclusive urban center and international destination.

In 2019, DTLA experienced a record-breaking 22 million visitors and \$10 billion in visitor-related spending. Yet in the wake of the COVID-19 pandemic, tourism is at a standstill, with nearly 500,000 people in the visitor and service industry out of work. DTLA office space vacancy pre-COVID was around 15%. Today, offices are 30% occupied on a good day, and more typically 10-20% occupied due to COVID. This vacancy has reverberations for all service sectors that depend on office buildings full of employees and retail and restaurants full of customers.

The most economically successful downtowns in the past decades have coupled density increases with needed land use entitlements and infrastructure to create walkable, urban environments. These urban, walkable centers around the country produce economic, environmental and social equity benefits, most notably affordable and attainable housing, employment and services. This work has been spearheaded by Smart Growth America and our once-native, Chris Leinberger and George Washington University. Study after study in DC, Boston, Dallas-Ft. Worth, Atlanta, Michigan, etc. has underscored these benefits.

We advocate taking a holistic step forward to creating these environments to ensure our economic and environmental future with the density necessary to provide adequate housing and support the reinvestment in retail and restaurants necessary to recover economically. We cannot take a step backwards with entitlement models that further erode our chance for a positive triple-bottom line future (economy, environment, equity).

2. Position DTLA to receive the maximum amount of federal, state, local and private funding for crucial zero-emission transportation projects by adding the following projects to the DTLA 2040 Plan maps and ensure the maximum transit-oriented development zoning adjacent to these projects:

- Metro Regional Connector and all of its station areas
- the Aerial Tram planned to connect Union Station, The Cornfields State Park, Chinatown and Dodger Stadium
- the Los Angeles Streetcar and station areas along Hill Street, Broadway, 1st, 7th and 11th Streets, and Figueroa Boulevard.
- Metro West Santa Ana Branch (both route options)

- the proposed 6th Street Station on the Metro Red/Purple Line in the Arts District
- the expanded EV bus and bicycle networks, outlined in Metro's NextGen Bus Study and new LADOT DASH routes.

Expanding the number of jobs, education, recreation and housing options connected to transit will improve DTLA's livability and air quality.

3. Allow for many different housing options, including diverse typology, rather than requiring only single income development or single use typologies such as live/work in particular areas of DTLA.

Increase opportunities for home ownership. More broadly, there should be a general increase in housing production opportunities such as increasing height limits, reducing entitlement hurdles, increasing streamlined processes for housing of all kind (affordable and market-rate) and reducing development fees. To deliver 120,000 mixed-income units in DTLA, residential development needs the fewest entitlement restrictions, as long as affordable and workforce housing can be included or contributed to as part of each project.

4. Increase height limits to ensure that new housing and commercial projects can "pencil out."

Post-COVID-19, development funding is scarce and cities throughout the country are competing for private development dollars by providing expedited processes. In order to deliver mixed-income housing, height limits and densities should be maximized, rather than minimized.

5. Maximizing density and expediting development processes will benefit the City of Los Angeles budget, and benefit DTLA's safety, equity, livability, mobility and environment.

It will also benefit the future Enhanced Infrastructure Finance District (EIFD), currently in the planning process for DTLA. As DTLA experienced with the Community Redevelopment Agency (CRA) before it was dissolved, the greater the allowable development in an area combined with an expedited development process, the greater the tax increment yield which expands funding resources for investments to address DTLA's myriad housing, homeless and mobility needs in and around the future EIFD planned for DTLA.

Thank you for your consideration. We look forward to participating in the DTLA 2040 Plan hearing process as it moves through City approval.

Sincerely,



Sandy Sanchez
BizFed Chair
FivePoint



David Fleming
BizFed Founding Chair



Tracy Hernandez
BizFed Founding CEO
IMPOWER, Inc.

CC: Mayor Eric Garcetti
Councilmember Kevin De Leon
All City Councilmembers
Vince Bertoni, GM, Planning
City of Los Angeles Planning Commissioners
Seleta Reynolds, GM, LADOT
Phil Washington, CEO, LA Metro

Attachments:

Central City Association Letter Dated 12/1/2020
FASTLinkDTLA Letter Dated 1/12/21
Fashion District BID letter Dated 11/12/20
Building Owners and Managers Association Greater Los Angeles Dated 1/13/21

BizFed Association Members

Action Apartment Association
Alhambra Chamber of Commerce
American Beverage Association
American Hotel & Lodging Association
American Institute of Architects – Los Angeles
Angeles Emeralds
Apartment Association, California Southern Cities
Apartment Association of Greater Los Angeles
Arcadia Association of REALTORS
AREAA North Los Angeles SFV SCV
Asian Business Association
Association of Club Executives
Association of Independent Commercial Producers
Azusa Chamber of Commerce
Bell Gardens Chamber of Commerce
Beverly Hills Bar Association
Beverly Hills Chamber of Commerce
BNI4SUCCESS
Boyle Heights Chamber of Commerce
Building Industry Association, LA / Ventura
Building Industry Association, Baldyview
Building Owners & Managers Association, Greater LA
Burbank Association of REALTORS
Burbank Chamber of Commerce
Business & Industry Council for Emergency Planning & Preparedness
Business Resource Group
CA Natural Resources Producers Assoc
CalAsian Chamber
CalCFA
California Apartment Association, Los Angeles
California Asphalt Pavement Association
California Association of Food Banks
California Bankers Association
California Bus Association
California Business Roundtable
California Cannabis Industry Association
California Cleaners Association
California Construction and Industry Materials Association
California Contract Cities Association
California Fashion Association
California Gaming Association
California Grocers Association
California Hispanic Chamber of Commerce
California Hotel & Lodging Association
California Independent Oil Marketers Association
California Independent Petroleum Association
California Life Sciences Association
California Manufacturers & Technology Association
California Metals Coalition
California Restaurant Association
California Retailers Association
California Small Business Alliance
California Society of CPAs -Los Angeles Chapter
California Sportfishing League
California Trucking Association
Californians for Balanced Energy Solutions
Carson Chamber of Commerce
Carson Dominguez Employers Alliance
CDC Small Business Finance
Central City Association
Century City Chamber of Commerce
Cerritos Regional Chamber of Commerce
Citrus Valley Association of REALTORS
Commercial Industrial Council/Chamber of Commerce
Construction Industry Air Quality Coalition
Construction Industry Coalition on Water

Quality
Council on Trade and Investment for Filipino Americans
Covina Chamber of Commerce
Culver City Chamber of Commerce
Downey Association of REALTORS
Downey Chamber of Commerce
Downtown Center Business Improvement District
Downtown Long Beach Alliance
El Monte/South El Monte Chamber
El Segundo Chamber of Commerce
Employers Group
Engineering Contractor's Association
EXP
F.A.S.T. - Fixing Angelenos Stuck In Traffic FilmLA
Friends of Hollywood Central Park
Fur Information Council of America
FuturePorts
Gardena Valley Chamber of Commerce
Gateway to LA
Glendale Association of REALTORS
Glendale Chamber of Commerce
Glendora Chamber of Commerce
Greater Antelope Valley Association of REALTORS
Greater Lakewood Chamber of Commerce
Greater Los Angeles African American Chamber
Greater Los Angeles Association of REALTORS
Greater Los Angeles New Car Dealers Association
Harbor Trucking Association
Historic Core Business Improvement District
Hollywood Chamber of Commerce
Hong Kong Trade Development Council
Hospital Association of Southern California
Hotel Association of Los Angeles
Huntington Park Area Chamber of Commerce
Independent Cities Association
Industry Business Council +
Inglewood Airport Area Chamber of Commerce
Inland Empire Economic Partnership
International Warehouse Logistics Association
La Cañada Flintridge Chamber of Commerce
L.A. County Medical Association
L.A. Fashion District BID
L.A. South Chamber of Commerce
Lancaster Chamber of Commerce
Larchmont Boulevard Association
Latino Food Industry Association
LAX Coastal Area Chamber of Commerce
League of California Cities
Long Beach Area Chamber of Commerce
Los Angeles Area Chamber of Commerce
Los Angeles County Board of Real Estate
Los Angeles County Waste Management Association
Los Angeles Gateway Chamber of Commerce
Los Angeles Gay and Lesbian Chamber of Commerce
Los Angeles Latino Chamber of Commerce
Los Angeles Parking Association
Marketplace Industry Association
Motion Picture Association of America
MoveLA a Project of Community
NAIOP Southern California Chapter
National Association of Royalty Owners
National Association of Tobacco Outlets
National Association of Women Business Owners
National Association of Women Business Owners – Los Angeles

National Hispanic Medical Association
National Latina Businesswomen
Orange County Business Council
Pacific Merchant Shipping Association
Pacific Palisades Chamber of Commerce
Panorama City Chamber of Commerce
Paramount Chamber of Commerce
Pasadena Chamber of Commerce
Pasadena-Foothills Association of Realtors
PhRMA
Planned Parenthood Southern Affiliates of California
Pomona Chamber of Commerce
Propel L.A.
Rancho Southeast Association of REALTORS
Recording Industry Association of America
Regional Black Chamber - San Fernando Valley
Regional Hispanic Chamber of Commerce
Regional Chamber of Commerce-San Gabriel Valley
Rosemead Chamber of Commerce
San Dimas Chamber of Commerce
San Gabriel Chamber of Commerce
San Gabriel Valley Economic Partnership
San Pedro Peninsula Chamber of Commerce
Santa Clarita Valley Chamber of Commerce
Santa Clarita Valley Economic Development Corp.
Santa Monica Chamber of Commerce
Sherman Oaks Chamber of Commerce
South Bay Association of Chambers
South Bay Association of REALTORS
South Gate Chamber of Commerce
Southern California Contractors Association
Southern California Golf Association
Southern California Grantmakers
Southern California Leadership Council
Southern California Minority Suppliers Development Council Inc. +
Southern California Water Coalition
Southland Regional Association of REALTORS
Sunland-Tujunga Chamber of Commerce
The Young Professionals at the Petroleum Club
Torrance Area Chamber
Town Hall Los Angeles
Tri-Counties Association of REALTORS
United Chambers San Fernando Valley & Region
United States-Mexico Chamber
Unmanned Autonomous Vehicle Systems Association
US Green Building Council
US Resiliency Council
Valley Economic Alliance
Valley Industry & Commerce Association
Vernon Chamber of Commerce
Vietnamese American Chamber of Commerce
Warner Center Association
West Hollywood Chamber of Commerce
West Los Angeles Chamber of Commerce
West San Gabriel Valley Association of REALTORS
West Valley/Warner Center Association Chamber
Western Manufactured Housing Association
Western States Petroleum Association
Westside Council of Chambers
Westwood Community Council
Westwood Village Rotary Club
Whittier Chamber of Commerce
Wilmington Chamber of Commerce
World Trade Center Los Angeles
Young Professionals in Energy - LA Chapt



December 1, 2020

Brittany Arceneaux, City Planner
City of Los Angeles Department of City Planning
200 North Spring Street, Room 667
Los Angeles, CA 90012
Via email: brittany.arceneaux@lacity.org

Re: Comments on ENV-2017-433-EIR: DTLA 2040 Draft Environmental Impact Report (DEIR)

Dear Ms. Arceneaux,

Established in 1924, Central City Association is an advocacy organization committed to DTLA’s vibrancy and increasing investment in the region. We are a membership organization comprised of approximately 300 members and our membership reflects the diversity of DTLA including housing builders, nonprofit organizations and large employers. We are committed to the DTLA 2040 Community Plan and making sure that it advances DTLA’s growth and serves as a model for other areas in the city that are proximate to transit. We offer this letter to comment on the Draft Environmental Impact Report (DEIR) for DTLA 2040 and to raise key issues within the plan that we believe inhibit much-needed housing production amid a housing and homelessness crisis and will hinder economic recovery from the COVID-19 pandemic and future economic growth. **Importantly, the DEIR for this plan was prepared in a vastly different context than today -- prior to the COVID-19 pandemic and resulting economic depression, before the City was assigned a housing production goal of over 455,000 for the next eight years and apart from state and federal infrastructure considerations. As such, we strongly encourage the adoption of Alternative 3 in the DEIR to allow for the greatest housing and development capacity and flexibility to spur DTLA’s recovery and best position the heart of our city for private and public investment (REC #1).**

We believe that DTLA 2040 cannot be considered in a vacuum separate from the conditions affecting DTLA and the city at large, and what is at stake for our future. Our detailed comments on the plan herein are informed by three major considerations:

1. The deep impacts of the COVID-19 pandemic on DTLA and the City’s economy and future growth;
2. The persistent housing and homelessness crisis, and unprecedented City housing production responsibility of over 455,000 new units over the next eight years alone, per the 6th Cycle Regional Housing Needs Assessment (RHNA); and
3. The need for local land use plans to demonstrate a clear and substantial commitment to transit-oriented growth to compete for state and federal transportation infrastructure funding.

1. The Impacts of the COVID-19 Pandemic

While COVID-19 has impacted every community, DTLA, the city’s urban high-rise core, has faced unique challenges as perceptions of urban living contributing to pandemic spread have perpetuated. Office towers are nearly empty, and many retail and restaurant businesses are shuttered which will likely persist for years to come as the pandemic has resulted in permanent job losses and shifts to remote work. DTLA normally receives over 22 million visitors in a given year, serving as an anchor of our local economy, but a depressed tourism market without conventions or events is reflected in an astoundingly low hotel occupancy rate of about 40 percent and drops in revenue per available room of over 50 percent compared to last year.¹ Apartment dwellers have increasingly looked to live

¹ *Second Quarter 2020 Downtown LA Market Report*, Downtown Center Business Improvement District:
<https://ctycms.com/ca-dtla/docs/dtla-market-report-q2-2020.pdf>

outside the city center, and residential rents have fallen by seven percent compared to last year and vacancy rates are near 15 percent.²

The pandemic has dramatically changed the landscape of DTLA. Projects that were previously financially viable have greatly diminished in value. We're hopeful that DTLA's economic prospects will strengthen as restrictions are lifted, successful vaccines are obtained and made widely available and perceptions of urban life improve. However, it may be some time before circumstances get better, and DTLA 2040 must be sensitive to this economically vulnerable context if we are to continue to see new growth and community benefits in DTLA.

2. The Housing and Homelessness Crisis and RHNA Obligations

As the Southern California Association of Governments (SCAG) finalizes the 6th Cycle RHNA, it's clear that the City of Los Angeles will be responsible for delivering an incredible amount of new housing by the order of more than 455,000 units between 2021 to 2029. The magnitude of this housing target cannot be overstated – in the City's history, only 420,000 units were built at the peak of housing production over the course of 20 years between 1960 to 1980. At the same time, homelessness in the city continues to increase, growing by over 14 percent last year reaching more than 41,000 unhoused people living in the city, 16 percent of whom are in DTLA which is the largest concentrated street homeless population in the nation. While this housing goal stands out as seemingly astronomical, in reality it reflects a persistent housing and homelessness crisis that has long-been one of the major issues facing the city and region, but left largely unaddressed by solutions of the necessary scale.

The DTLA 2040 plan notes that SCAG projects that DTLA will make up over 20 percent of the city's growth over the next two decades, which is a significant share of the City's RHNA target and means that at least 12,000 units per year on average need to be built in DTLA over the next eight years alone. As the region's transit and job hub, DTLA must play an outsized role in meeting this ambitious goal, requiring DTLA 2040 to provide substantial capacity for new growth. Alternative 3 of the DEIR is the superior alternative as it would enable the greatest growth and housing production.

3. Competing for State and Federal Infrastructure Funding

State and federal funding for transportation and other infrastructure projects are increasingly tied to land use plans that provide substantial new opportunities for growth and development near transit. Moreover, current efforts to establish an Enhanced Infrastructure Financing District (EIFD) in DTLA offer the promise of a dedicated local source of funding for an array of public benefit projects, including affordable housing, in DTLA that can also help attract supplemental state and federal funding, but can only be impactful if supported by land use planning that promotes new development to bolster property tax increment growth.

As we continue to build out our regional transit system, revamp our bus network to be world class and dedicate resources to making DTLA and our city truly multimodal, the success of these major investments will be dependent on coordination with visionary planning for new development in tandem. It is also critical as we look ahead to draw new public and private investment to DTLA and our city – DTLA 2040 must be a clear signal to this end.

We believe much of the plan as proposed is a great improvement to DTLA's land use and planning framework and we are appreciative of City Planning's outreach and engagement, and the important changes already made to the plan over the course of its development. We recognize that DTLA 2040 is an enormous undertaking for City Planning as it will be the first community plan to implement the new citywide zoning code. We appreciate the significant resources dedicated to the plan's development and are pleased that DTLA continues to be the City's laboratory for new ideas, but DTLA 2040 must go even farther to promote a bold, exciting and resilient future for our city center. **We offer this letter to strongly encourage adoption of Alternative 3 in the DEIR and to provide detailed suggestions to enhance the plan, with the goal of a connected, equitable and inclusive DTLA that has a broad range of housing**

² Ibid.



options and affordability, park space, education and childcare facilities and diversity in mobility and employment opportunities.

Building off of our [January 21, 2020 letter](#), we’ve broadly categorized our recommendations as follows: 1) maximizing opportunities for housing at all income levels, including middle-income housing and 2) creating flexibility within the plan to be adaptable over the next two decades. Underpinning this all, we are focused on a plan that can support financially feasible development, which is critical to yielding the housing growth and maximum community benefits envisioned in the plan as well as depoliticizing development in DTLA.

Maximizing Opportunities for Housing, Including Middle-Income Housing

CCA strives to make DTLA the place for new housing at all income levels. Despite being just one percent of the city’s land, DTLA accounts for over one-third of new apartment units built in the city over the past decade. Ensuring that substantial new housing can continue to be built in DTLA is essential to addressing our regional housing crisis and meeting our RHNA and environmental sustainability goals by focusing growth in the densest and most transit- and job-rich area of the city.

On paper the plan would generally expand where housing is allowed from 33 percent of the plan area to 60 percent and major changes toward parking policy like eliminating minimum parking requirements are important steps to supporting project feasibility and fostering high-quality development appropriate for urban cores. Additionally, we appreciate the recent revision to the plan to no longer count above-ground parking toward project FAR, which would have had diminished capacity for housing. Still, there are specific provisions throughout the plan that would negatively impact the feasibility of housing development in practice. We believe the following provisions are problematic as proposed and offer suggested solutions that reasonably accommodate plan intent and economic feasibility.

Financial Feasibility of the Community Benefits System

The plan’s proposed Community Benefits System would allow developments to maximize FAR and build larger than otherwise allowed under the base zoning in return for providing certain public benefits, namely affordable housing, publicly-accessible open space and community facilities. This new system would apply throughout the plan area and replace the Transfer of Floor Area Rights (TFAR) program that currently applies only to South Park, the Financial District and parts of the Historic Core. We are generally supportive of the proposed concept of the Community Benefits System, and we share the goal of realizing more on-site public benefits, especially affordable housing. We are also pleased to see recent changes to the Community Benefits System that provide clearer upfront standards to enable Level 2 benefits like open space and community facilities through a by-right process rather than via discretionary review. However, we are concerned about specific provisions that impact the financial feasibility of utilizing the bonus FAR, particularly for high-rise projects at this immensely economically challenging time for DTLA.

The economic fallout from the pandemic presents major issues for building in DTLA, but it’s important to note that the Community Benefits System, primarily the affordable housing bonus provisions, poses challenges for the financial feasibility of development even in strong economic conditions. As shown in the table below, Level 1 of the DTLA 2040 Community Benefits System is essentially aligned with the City’s Affordable Housing Density Bonus and Tier 1 of the Transit Oriented Communities (TOC) Program in terms of the percentage of affordable housing required by income level (with the exception of options for Deeply Low and Moderate Income housing under DTLA 2040). However, the FAR bonus for providing affordable housing is 35 percent, which is at the lowest end of the City’s affordable housing incentive programs in alignment with the Density Bonus.



Comparison of DTLA 2040 Level 1 Affordable Housing Incentive Program and Other City Affordable Housing Programs

		TOC Tier 1	TOC Tier 2	TOC Tier 3	TOC Tier 4	Affordable Housing Density Bonus	DTLA 2040 Community Benefits Program Level 1
Affordability Requirements	Deeply Low	n/a	n/a	n/a	n/a	n/a	5%
	Extremely Low	8%	9%	10%	11%	n/a	8%
	Very Low	11%	12%	14%	15%	11%	11%
	Low	20%	21%	23%	25%	20%	20%
	Moderate	n/a	n/a	n/a	n/a	n/a	40%
Bonus	Density Increase	50%	60%	70%	80%	35%	n/a
	FAR Increase	40%	45%	50%	55%	35%	35%

The Density Bonus and TOC programs have been effective at producing mixed-income developments with on-site rent-restricted affordable housing elsewhere in the city. However, most development in the city outside of DTLA is mid-rise wood frame construction, which is a less costly type of construction than the high-rise concrete and steel construction that is typical in DTLA. Type I projects, which are generally high-rise buildings made of concrete and steel, cost an average of \$71 per square foot more than other construction types like Type V wood frame buildings.³ Coupled with adverse economic conditions, this means that high-rise construction in DTLA faces higher costs for lower value. We believe DTLA is the best place for high-rise construction, which is the most efficient way to build a high volume of housing near transit, and is largely built with unionized labor, providing well-paying jobs. **We recommend that Level 1 of the DTLA 2040 Community Benefits Program provide a more substantial FAR increase to support the feasibility of high-rise construction. We also believe that the ability to contribute an in-lieu payment or partner with an affordable housing provider to provide affordable units off-site are good, important features of the Community Benefits System that must be maintained as they offer necessary flexibility (REC #2).**

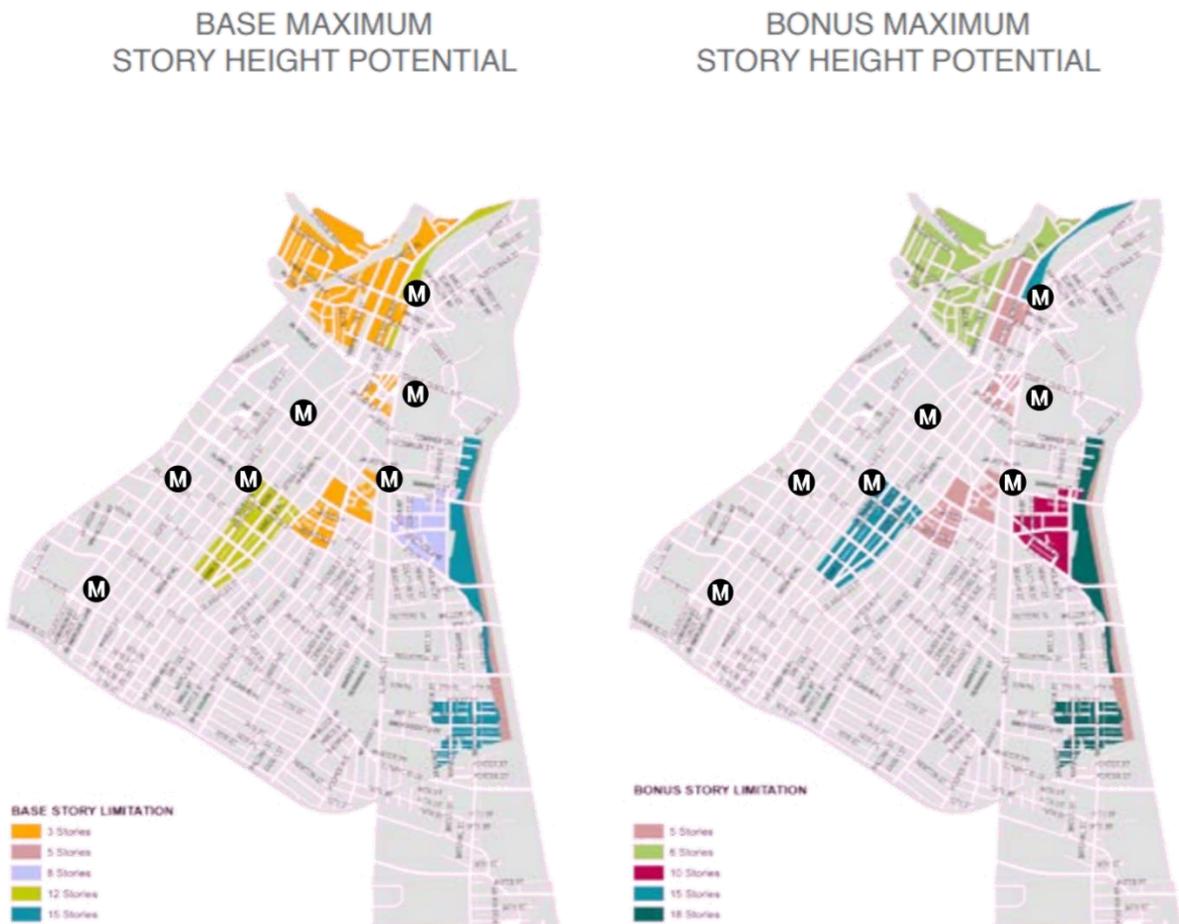
Additionally, we are concerned about recent changes to the plan whereby base FARs were reduced in Chinatown, Little Tokyo and areas of the Historic Core and Fashion District. The changes are substantial: from 6.0 to 2.0, a 66 percent decrease, in Chinatown and Little Tokyo, and from 7.0 and 6.0 to 3.0, a 60 percent and 50 percent decrease respectively, in the Historic Core and Fashion District. While we understand the intent of these changes is to ideally increase usage of the Community Benefits System, we are concerned that this is too dramatic of a change that tips the scales of project economics to be economically infeasible. These are walkable, transit-rich areas where we want to promote growth, but the reductions in base FAR create a de facto scenario where the FAR is too low to build a viable project under the base FAR allowances on the one hand while simultaneously placing a large financial onus on projects to obtain bonus FAR via the Community Benefits System. Because the Level 1 affordable housing FAR bonus is 35 percent of the base FAR, the Level 1 bonus is necessarily reduced as well (for example, a 35 percent bonus on 6.0 base FAR is an additional 2.1 FAR, but is only an additional 0.7 FAR on a 2.0 base FAR). The October 2019 financial feasibility analysis of the Community Benefits System prepared by HR&A Advisors for the City specifically highlights this issue, stating that Chinatown and a large swath of the Fashion District leading into the Historic Core, where most of these FAR changes would apply, “are unlikely to support larger high-rise developments until market performance matures further, and thus are not able to support public benefits to the same degree as Place Types with strong submarkets.” **As it’s clear that these recent reductions in base FAR would jeopardize development feasibility, we firmly recommend maintaining base FARs as they were proposed prior to the Fall 2020 changes to the plan. (REC #3).**

³ *The Hard Costs of Construction: Recent Trends in Labor and Materials Costs for Apartment Buildings in California*, UC Berkeley Turner Center for Housing Innovation: http://turnercenter.berkeley.edu/uploads/Hard_Construction_Costs_March_2020.pdf

Building Height Limits and Minimums

As shown in the map below, the plan would impose base and bonus (with use of the Community Benefits Program) maximum building height limits in Little Tokyo, the northern portion and eastern edge of the Arts District, Chinatown, and Historic Core, all of which are close to existing Metro rail stations. There are also major transit projects in these areas in the pipeline, like the Regional Connector, West Santa Ana Branch and Streetcar. Like the reduction in base FARs, we take issue with the proposed building height limits, particularly in areas near transit stations as we are investing hundreds of billions of dollars in building out our transit system and as these are exactly the areas we need our city to grow to become less car-dependent and more affordable and sustainable. It is essential to demonstrate our commitment to growth in areas near transit as we compete for infrastructure funding from the state and federal governments.

Base and Bonus Height Limits with Existing Metro Stations



We recognize the need to preserve DTLA’s historic neighborhoods, communities and buildings but are concerned about the proposed approach. Blanket height limits are not an appropriate tool for neighborhood preservation. Historic districts and buildings should be considered through the requisite historic preservation and landmarking processes, which is much more targeted and would not inhibit growth on sites that might not have historic or cultural

significance. Additionally, we believe that context-sensitive growth can occur with the use of urban design tools like setbacks and street frontage requirements.

Furthermore, in many cases, the proposed building height limits are not aligned with the economic realities of development and the constraints of relative construction materials. For instance, mixed-use buildings can generally be built with wood frame over a concrete parking and retail podium to a maximum of eight stories under the building code, and buildings made of concrete and steel can be taller but typically need to be a minimum of 20 stories to be financially feasible and justify the additional costs of the more expensive labor and building materials. Some of the proposed base and bonus height limits in areas of DTLA are 12 stories and 15 stories, respectively, and 15 and 18 stories, respectively. With a few exceptions for large sites that can accommodate a lot of building capacity, most mixed-use developments will not even be able to build to the base height limits of 12 and 15 stories, and these height limits will act like an eight-story limit in reality. This means that the growth envisioned by the plan may not actually occur and the resulting community benefits will also not be delivered.

To promote context-sensitive growth and density near transit, respect neighborhood character and appropriately preserve historical assets in a way that reflects the economic realities of development, we recommend that building height maximums be removed and instead utilize FAR, setbacks and frontage requirements to govern building height and massing, and that historic communities be considered instead through the established historic preservation processes (REC #4).

Conversely, the new zoning code proposes to include building height minimums, which may also be problematic and limit the potential for new development. While the intent of this is clearly to encourage, and even require, high-rise development, the reality is that high-rise development may not be feasible in certain locations or for certain uses including most affordable housing developments. For instance, K-12 schools, which are incentivized as a Tier 2 community benefit, typically require one-story or other generally low-rise construction, but they would be precluded in many areas. **We recommend that minimum building height requirements be removed to avoid unintended outcomes like limiting the potential for vacant or underutilized land to be redeveloped into desirable uses like affordable housing, schools or mid-rise mixed-use developments (REC #5).**

Transit Core General Plan Land Use Designation

Similar to our concerns about base FAR reductions and building height limits near transit, we believe the Transit Core General Plan land use designation is not being appropriately applied in connection with where transit exists now and in the future, and that we must do more to leverage public investment in transit infrastructure. The Transit Core designation allows projects that use the Community Benefits System to calculate FAR using the centerline of the street, which has been a successful feature of the current Transfer of Development Rights (TFAR) system that allows projects in DTLA to be larger and yield more public benefits. **We recommend that the Transit Core General Plan land use designation be expanded to include all areas close to existing, entitled and future transit to maximize development opportunities (REC #6).**

Limits on Housing in Hybrid-Industrial Areas

The plan effectively limits new housing in the Fashion District and Arts District to live/work units only. While recent updates to the plan would technically allow more types of housing in the Fashion District, there is a requirement that projects with housing be coupled with a minimum of 1 FAR of office or light industrial space, unless they are live/work. As there is very little demand for new office or light industrial uses in these areas, and with the uncertainties around these uses resulting from COVID, we believe the code as written will have the effect of limiting development in hybrid industrial areas to live/work.



We understand that the City may be constrained in this area by the Framework Element of the General Plan, which essentially limits the ability to rezone industrial areas and requires some amount of “jobs-producing” uses. However, we do not believe that a document adopted 20 years ago should inhibit our ability to plan for another 20 years into the future and cause us to settle for live/work housing when we want to create inclusive, dynamic neighborhoods.

In general, live/work units require high floor to ceiling heights and must be built to commercial standards so are typically more expensive to design and build than a residential unit. The plan requires that live/work units in a project must be a minimum average size of 750 square feet in the Fashion District and 1,000 square feet in the Arts District, which is very economically and spatially inefficient for studios and one-bedroom units. Because they are lofts and lack the walls or partitions of conventional apartments, they are generally not good units for families; requiring these kinds of units is inherently exclusionary. Lastly, they are also impossible to monitor to ensure that they are supporting economic “job-producing” activity, rather than just serving as costly residential lofts.

We recommend that City Planning adopt an amendment to the Framework Element in tandem with DTLA 2040, which will allow for far greater flexibility to plan hybrid industrial areas as mixed-use neighborhoods with a diversity of housing types (REC #7). In lieu of amending the Framework Element, we believe that there could still be more flexibility for different housing types in Hybrid-Industrial areas. **In the absence of an amendment to the Framework Element, we recommend that for projects that include more conventional multi-family housing, set the commercial space requirement as 10% of building area, which will create fairer rules for all projects than the current requirement that is based on lot size, especially those that don’t use a site’s full FAR (REC #8).**

The proposed IX4 Use District that applies to the Arts District also requires that all new structures be built entirely as Type I, II or IV construction, which largely excludes the use of wood materials. As mentioned earlier, wood is more affordable and sustainable than concrete and steel building materials. Wood has also been successfully used to build compellingly designed buildings in the Arts District and throughout the city. Amid our current housing crisis, greatly reducing the ability to use wood construction is counterproductive and runs counter to our goal of making DTLA the place for housing at all income levels. **DTLA 2040 is seemingly the first community plan that has attempted to dictate construction types and we believe such a determination is out of scope for zoning codes to mandate and should be left to building and safety codes – we recommend that this requirement be removed from the plan (REC #9).**

Ban on Market Rate Housing

As proposed, DTLA 2040 will not allow market rate housing in a specific area of DTLA from 5th to 7th Streets and San Pedro Street to Central Avenue. We echo and fully endorse the report titled [The Voices of Central City East](#) submitted by the Central City East Association (CCEA) regarding this neighborhood of DTLA.

As CCEA highlights, the intent of banning market rate housing in this area may be to preserve existing affordable housing and single room occupancy hotels, but it is unnecessary given covenants, the Residential Hotel Conversion and Demolition Ordinance, the Wiggins Settlement and predominance of housing that is owned by non-profit organizations with a mission to provide shelter to vulnerable populations. This area contains the largest concentration of unsheltered homeless people in the nation. It is an area of extreme poverty and need. Banning market rate housing would further concentrate poverty in this area of DTLA and run counter to stated DTLA 2040 plan goals of inclusive and diverse neighborhoods.

To date, there are no market rate developments, built or proposed, in this area. Imposing this provision would only freeze the current conditions and further a failed policy of containment. We believe this policy also directly conflicts with the federal mandate to Affirmatively Further Fair Housing (AFFH). Affordable housing is an important part of DTLA 2040, and it should be integrated throughout the plan area. We strongly support housing opportunities for all incomes across DTLA as the primary tool to address the complicated and extensive challenges of homelessness and poverty in our city.

It's important to recognize that the Community Plan, which is a land use and zoning plan, cannot alone address the challenges of this area. Truly meeting the needs of this area requires a much broader effort that involves mental health, workforce development and social services, which will take coordination from multiple departments and organizations, which we support and encourage.

We support CCEA's report and recommendations, and likewise recommend that the ban on market rate housing from 5th to 7th Streets and San Pedro Street to Central Avenue be removed from DTLA 2040, and instead urge City Planning to consider ways the area's zoning can be tailored to produce mixed-income developments and socioeconomic integration and inclusion (REC #10).

Micro-Units

CCA has been strongly supportive of micro-unit housing, including publishing a [white paper on micro-units](#) and advocating for a [proposal put forth by Councilmember Cedillo](#) for the City to assess barriers and policy changes to support micro-units. The Community Plan Text includes micro-units as a priority for new housing types (LU 2.6), however there is an important missing policy tool that would help effectuate this goal.

A simple but meaningful policy change would be allowing affordable units to be a different mix than market rate units in the same building, but still require the same amount of overall affordable floor area. The unit finishes, access points for entry/exit and amenities would be identical for the market rate and affordable units. For example, DTLA 2040 could allow two 350 square foot affordable units on par with one 700 square foot market rate unit in the same building. This would be a deviation from the City's [Affordable Housing Guidelines](#), which generally require that affordable units be the same average square footage and number of bedrooms as market rate units in the same building.

We believe that DTLA is an appropriate place for a flexible policy to encourage affordable micro-unit housing because it is dense, transit-rich and walkable, which are all complementary to micro-units. We also believe this is meaningful tool to increase the amount of affordable housing that can be leveraged by non-subsidized development and may help to deliver the workforce, moderate income housing that is currently not being built but is needed.

We recommend DTLA 2040 allow affordable units to be a different mix than market rate units in the same mixed-income buildings, but still require the same amount of affordable floor area as a percentage of overall residential floor area akin to the number of affordable units that would be required of the total number of units (REC #11). This would yield a greater number of affordable housing units while still requiring the same dedication of square footage.

Creating Flexibility Within the Plan to be Adaptable Over the Next Two Decades

DTLA 2040 will guide DTLA's growth over the next 20 years but it is unreasonable to believe that we can adequately plan in anticipation of the changes that will take place over that time. It is fundamentally important that the plan set a strong overarching vision for DTLA but be structured to provide sufficient flexibility to adapt to changes if it is to be a success. When we refer to flexibility, we mean allowing a broad range of land use and development scales, designs and typologies in all areas of DTLA, and with clear, simple approval pathways for minor deviations that may be necessary to facilitate development. We believe that highly specific provisions included in the plan today, even if well-intentioned, may have unintended downstream consequences that will make the plan less useable in the future, and instead result in projects seeking discretionary review or quell development altogether. Here again, we are appreciative that City Planning has recently made important changes that remove unnecessary constraints and create more flexibility in alignment with plan goals with revisions such as no longer requiring schools and child care facilities to obtain Conditional Use Permits (CUPs) in most areas, and not limiting hotels by number of rooms or ground-floor commercial tenants by square footage outside of Chinatown and Little Tokyo. We believe there are additional areas of the plan that can be amended to ultimately make DTLA 2040 more flexible and sustainable, and we outline each area of the plan where we believe provisions are overly rigid and with our recommended revisions.

Approval Processes

We know that City Planning and CCA have a shared goal of ensuring that DTLA 2040 greatly reduces the need for projects to seek discretionary approvals and creates greater capacity for by-right and ministerial approval processes. The approval processes laid out in DTLA 2040 refer back to the Processes and Procedures Ordinance, which is Article 13 of the new citywide zoning code being created as part of the re:code LA project. However, we are concerned that the Processes and Procedures Ordinance has not yet been finalized and adopted, and likely will not be until the middle of 2021. This makes it very challenging to provide detailed comments on the approval processes under DTLA 2040 and creates uncertainty for implications that the Processes and Procedures Ordinance might have on DTLA 2040. We're hopeful that the proposed zoning that is established under DTLA 2040 will produce financially feasible developments, but we know that there's a good possibility that projects with unique circumstances will need to deviate from the baseline zoning to be feasible. **While ultimately providing objective criteria and flexibility in each site's zoning is the best way to avoid issues of uncertainty and discretion in the approval process, we recommend that City Planning provide very clear, administrative clearance processes that are CEQA-exempt for deviations and relief mechanisms like alternative compliance, variances and adjustments (REC #12).**

We also appreciate that the proposed plan creates higher Site Plan Review thresholds for projects that use the Community Benefits System to be 500 units or 500,000 square feet of nonresidential space, up from 50 units and 50,000 square feet of nonresidential space. We have long been advocates for a more sensible approach to Site Plan Review that does not punish dense, urban development, particularly in our urban core. Although we believe the higher Site Plan Review benchmark is certainly an improvement over the very low threshold currently, we believe that affording this only to projects that use the Community Benefits System creates a punitive scenario for projects using only the base zoning and does not account for DTLA's role as the city's center for growth. **We recommend that projects, whether using the base zoning or the Community Benefits System, not be subject to Site Plan Review or other discretionary review processes if they comply with a site's allowable zoning and are not seeking any additional changes (REC #13).** We believe this is logical and is the very purpose of areawide planning efforts like DTLA 2040. Many cities use this model, and San Diego, the nearest big city to do so, is a good example.

Frontage Design Requirements

Through the use of Frontage Districts, the plan would create highly specific design requirements for buildings in the Arts District and Historic Core. Recent updates to the plan relaxed some of these requirements by now allowing buildings in these areas to have balconies, no longer prohibiting features like flat roofs and applying the frontage requirements to only the first few stories of buildings. These changes are improvements, but we believe the Frontage Districts in the Arts District and Historic Core are still very prescriptive and will constrain creative approaches to design and architecture. We continue to work with our members to contemplate how these Frontage Districts can be more flexible. We suggest providing a range for ground-floor heights rather than a set minimum of 22' in the Arts District, changing language for symmetrical lite pattern to be more open such that "glazed openings should be divided into smaller components" or something similar, making base-middle-top a "reference" rather than a requirement so that there is room for architects to interpret incorporation and similarly expanding options for expressing the horizontal and vertical banding "by reference" or "interpretation." **We recommend that City Planning continue to explore ways of modifying the Arts District and Historic Core Frontage Districts to strike a balance between fostering contextual design with the potential for creative approaches and innovation. We welcome the opportunity to collaborate to further consider how this can be accomplished (REC #14).**

Industrial Zoning

The plan expands opportunities for mixed-use development, but there is still a large area of DTLA proposed to be maintained as industrial even though we know that retaining industrial land does not mean retaining industrial jobs or job-intensive uses. We witnessed the number of job-intensive uses like manufacturing convert to less productive

uses like wholesale in DTLA despite the fact that land uses have not been changed in much of DTLA's industrial areas. Between 2002 to 2017, manufacturing jobs decreased by 64 percent while jobs in wholesale trade increased by only six percent within the DTLA 2040 area.⁴

DTLA's economic success over the past two decades has instead been defined by increased livability, with the introduction of substantially more housing, public investments in transit and open space and accompanying amenities like places to shop and eat. This change has attracted new DTLA residents, encouraged more job-intensive and higher-paying businesses to locate here and more visitors to come here, which have replaced industrial-oriented jobs that largely disappeared over the past two decades. As those jobs shrunk between 2002 to 2017, jobs have increased by 14 percent in information industries, 24 percent in professional, scientific and technology services, 44 percent in arts and entertainment, 72 percent in accommodation and food services and 119 percent in health care industries.⁵

We should continue to build on this success and inject new uses into areas where jobs have declined, not perpetuate the decline of those areas by freezing the allowable land uses. Moreover, the few existing schools in DTLA are in industrial areas, meaning we should aim to introduce new active uses to support community building around these schools and support their long-term success.

Industrial areas are not likely to change overnight. Industrial vacancy rates are historically low and industrial rents are historically high, due to supply constraints across the LA area for small-format industrial uses for warehousing and distribution. Even if the zoning were permissive of conversion to other uses, the current market for industrial uses is likely strong enough that these properties would not convert to other uses in the near term. **We recommend that DTLA 2040 not include areas zoned exclusively for industrial uses, and that these areas should instead provide more flexible zoning to allow them to gradually convert to other uses, including housing, over the long term (REC #15).**

Adaptive Reuse

The Adaptive Reuse Ordinance (ARO) was a major catalyst for the revitalization of DTLA following its adoption in 1999. It unlocked the potential of DTLA's beautiful but obsolete historic office and bank buildings to have new lives as quality housing stock, and led to the first major influx of residents in DTLA. However, only buildings constructed prior to 1974 can utilize the ARO by-right, and any built more recently than that must go through an onerous discretionary review process.

We believe that expanding and enhancing the ARO can be an important tool to furthering the economic vitality of DTLA and is needed more than ever as the future of many of our commercial uses face great uncertainty due to the pandemic. We appreciate that City Planning has already made positive updates to the ARO in the draft plan like expanding eligible uses and by exempting certain features like basements and rooftop additions from FAR calculations. **To increase usage of the ARO, we recommend applying it to buildings constructed after 1974 on a rolling basis going forward (REC #16).**

Limits on Hotel Rooms and Ground-Floor Commercial Tenant Sizes

Recent changes to the plan largely removed limitations on hotels by number of rooms and ground-floor commercial tenants by square footage in all areas of the plan except for Chinatown and Little Tokyo, expressed by the CX1 Use District, which limits hotels to a maximum of 49 rooms and ground-floor commercial tenants to a maximum of 5,000 square feet.

⁴ According to data from the U.S. Census Bureau, OnTheMap Application and LEHD Origin-Destination Employment Statistics (Beginning of Quarter Employment, 2nd Quarter of 2002-2017) for the Downtown Community Plan Area.

⁵ Ibid.



Tourism is an anchor of our local economy and is critical to supporting businesses in Chinatown and Little Tokyo. **We recommend that the 49-room limit on hotels be removed in Chinatown and Little Tokyo as there is no clear rationale for this limit, and it is antithetical to strengthening DTLA's role as a major visitor destination (REC #17).** Additionally, unique among other big cities, DTLA 2040 would not allow hotel rooms to have kitchenettes. Rooms with kitchenettes are an increasingly popular lodging option, and are a useful, safe alternative amid the pandemic as dining out is limited. For DTLA to truly be a world class destination, it needs more flexible and adaptive lodging solutions that reflects the way guests travel today and how current events will shape guests' future preferences. **We recommend that DTLA 2040 allow hotel rooms to include kitchenettes (REC #18).** This is also an opportunity for the City to clear up issues of interpretation around extended stay hotels and show its commitment to innovation in lodging options.

Moreover, the intent of the limitation on ground-floor commercial business size seems to be to preserve these areas for small businesses, and/or achieve a small-scale business look and feel. We believe supporting small business growth and preservation is a worthwhile objective, but limiting businesses by square footage is a blunt policy tool that could negatively impact neighborhoods and exclude potentially desirable businesses. For instance, even the smallest grocery stores typically require 7,500 to 10,000 square feet of space, but these limitations would preclude them, despite a strong need for grocery stores in DTLA.

There's also no guarantee that small space limits would result in small businesses occupying these spaces instead of a franchise or chain business – this capacity is likely outside the scope of any Community Plan and would be better addressed through economic development policies. Instead, the Community Plan and zoning code could promote urban design that imbues a small business aesthetic, with awnings, required transparent frontages, plantings and articulation of storefronts. **We recommend that the tenant size limits be removed in Chinatown and Little Tokyo, and that other urban design tools be employed to provide for a small commercial look and feel in targeted areas while working with other City agencies to develop economic development tools to support small business in DTLA (REC #19).**

Public Open Space

The Community Benefits System suggests that public parks and open space must be provided at the ground floor. We believe this may be overly restrictive and prevent creative architecture and landscape design for these spaces. For example, a constrained site with proposed on-site public open space may not be able to provide all the open space at the ground floor but could instead provide terraced, stepped or undulating open space. This flexibility would allow the provision while also providing a unique design. A good local example is the public open space attached to the Walt Disney Concert Hall. **We recommend that the language regarding public on-site open space be expanded to state that it must be "clearly accessible" to the public, rather than required to be on the ground floor (REC #20).**

Transfer of Development Rights (TDR)

DTLA 2040 proposes to create a new TDR system applicable only to the Arts District. We would like to better understand why the TDR system only applies to the Arts District, and whether receiver sites may be outside the designated area or if both donor and receiver sites must be in the area. It is also unclear why SurveyLA or any historic survey may be used under the TDR system when they do not necessarily result in official historic designations. **We recommend that the TDR system be more broadly applicable across DTLA and that the criteria for historic resources be more closely tied to official historic designation (REC #21).**

Downtown Development Corporation & Infrastructure Coordination

Although the creation of a Downtown Development Corporation, an entity that would coordinate infrastructure and development projects and resources in DTLA, is outside of the scope of City Planning, it is worth considering as a policy objective in the Community Plan. The Community Benefits System is dynamic and exciting but is ultimately



limited to public benefits that can be provided by individual development projects on a one-off basis. For example, this means that while we have a broad objective of building more high-quality public open space in DTLA, the Community Benefits System may encourage individual sites to provide relatively small public open spaces, but is generally not designed to contribute to larger-scale open space projects like the redesign of Pershing Square or the Park 101 freeway cap park. These larger-scale projects would be better suited for a Downtown Development Corporation that could leverage public and private funds, and tools like EIFDs currently under study for DTLA and other tax increment financing (TIF) mechanisms. Notably, EIFDs can also fund affordable housing.

We believe that both on-site public benefits with individual projects and large-scale public benefit projects are important and welcome in DTLA. The Community Plan should lay the foundation for both. **We recommend that City Planning include a policy goal to coordinate DTLA 2040 land use planning with EIFD planning being led by LA Metro and the Economic and Workforce Development Department (EWDD) and that DTLA 2040 include the creation of a Downtown Development Corporation to plan, manage and implement large-scale public benefit projects and support funding for affordable housing within its policy objectives (REC #22).**

We know that the future of DTLA will set the course for the future of our city, and the DTLA 2040 plan will serve as the guiding framework for DTLA's growth over the next two decades. This plan is also being considered at a time when DTLA faces incredible uncertainty and adversity due to an unthinkable combination of circumstances including a global pandemic that has resulted in economic depression and questions about the fundamental values of dense urban living, development-related corruption charges against our neighborhood's former City Councilmember, and a persistent housing and homelessness crisis. The moment for leadership and a bold, visionary plan for DTLA could not be more important or necessary. We are pleased to work with you on this tremendously important plan, at an unprecedented time in the city's history. We are grateful for City Planning's continued partnership and look forward to seeing this plan be further refined as it moves through the approval process. Thank you for your consideration.

Sincerely,

Jessica Lall
President & CEO, Central City Association of Los Angeles

Attachment: Summary of Recommendations

CC: Councilmember Gil Cedillo, Council District 1
Councilmember Kevin de Leon, Council District 14
Councilmember Curren Price, Council District 9
Deputy Mayor William Chun, Office of Mayor Eric Garcetti

Summary of Recommendations

1. We strongly encourage the adoption of Alternative 3 in the DEIR to allow for the greatest development capacity and flexibility to spur DTLA’s recovery and best position the heart of our city for private and public investment.
2. Provide a more substantial FAR increase for Level 1 of the DTLA 2040 Community Benefits Program to support the feasibility of high-rise construction, and maintain the ability for in-lieu payments or partnering with affordable housing providers to provide affordable units off-site, which offer necessary flexibility.
3. Maintain base FARs as they were proposed prior to the Fall 2020 changes to the plan as it’s clear that recent reductions in base FAR would jeopardize development feasibility.
4. To promote context-sensitive growth and density near transit, respect neighborhood character and appropriately preserve historical assets in a way that reflects the economic realities of development, building height maximums should be removed and instead FAR, setbacks and frontage requirements should govern building height and massing, and historic communities instead considered through established historic preservation processes.
5. Remove minimum building height requirements to avoid unintended outcomes like limiting the potential for vacant or underutilized land to be redeveloped into desirable uses like affordable housing, schools or mid-rise mixed-use developments.
6. Expand the Transit Core General Plan land use designation to include all areas close to existing, entitled and future transit to maximize development opportunities.
7. Adopt an amendment to the Framework Element in tandem with DTLA 2040, which will allow for far greater flexibility to plan hybrid industrial areas as mixed-use neighborhoods with a diversity of housing types.
8. In the absence of an amendment to the Framework Element, for projects that include more conventional multi-family housing, set the commercial space requirement as 10% of building area, which will create fairer rules for all projects than the current requirement that is based on lot size, especially those that don’t use a site’s full FAR.
9. Remove requirements dictating construction types -- DTLA 2040 is seemingly the first community plan that has attempted to dictate construction types and we believe such a determination is out of scope for zoning codes to mandate and should be left to building and safety codes.
10. Echoing CCEA’s recommendations, remove the ban on market rate housing from 5th to 7th Streets and San Pedro Street to Central Avenue, and instead consider ways the area’s zoning can be tailored to produce mixed-income developments and socioeconomic integration and inclusion.
11. Allow affordable units to be a different mix than market rate units in the same mixed-income buildings, but still require the same amount of affordable floor area as a percentage of overall residential floor area.
12. Provide very clear, administrative clearance processes that are CEQA-exempt for deviations and relief mechanisms like alternative compliance, variances and adjustments.
13. Whether using the base zoning or the Community Benefits System, projects should not be subject to Site Plan Review or other discretionary review processes if they comply with a site’s allowable zoning and are not seeking any additional changes.
14. Continue to explore ways of modifying the Arts District and Historic Core Frontage Districts to strike a balance between fostering contextual design with the potential for creative approaches and innovation – our members welcome the opportunity to collaborate to further consider how this can be accomplished.
15. Do not zone areas exclusively for industrial uses – these areas should instead provide more flexible zoning to allow them to gradually convert to other uses, including housing, over the long term.
16. To increase usage of the ARO, apply it to buildings constructed after 1974 on a rolling basis going forward.
17. Remove the 49-room limit on hotels in Chinatown and Little Tokyo as there is no clear rationale for this limit, and it is antithetical to strengthening DTLA’s role as a major visitor destination.
18. Allow hotel rooms to include kitchenettes.



19. Remove tenant size limits in Chinatown and Little Tokyo, and use other urban design tools to provide for a small commercial look and feel in targeted areas while working with other City agencies to develop economic development tools to support small business in DTLA.
20. Expand the language regarding public on-site open space to state that it must be “clearly accessible” to the public, rather than required to be on the ground floor.
21. Apply the TDR system more broadly across DTLA and more closely tie the criteria for historic resources to official historic designation.
22. Include a policy goal to coordinate DTLA 2040 land use planning with EIFD planning being led by LA Metro and EWDD and include the creation of a Downtown Development Corporation to plan, manage and implement large-scale public benefit projects and support funding for affordable housing within the plan’s policy objectives.



January 12, 2020

Brittany Arceneaux, City Planner
Department of City Planning
City of Los Angeles
200 North Spring Street, Room 667
Los Angeles, CA 90012

Sent via e-mail due to COVID-19 pandemic:

Brittany.arceneaux@lacity.org

downtownplan@lacity.org

RE: FASTLinkDTLA Comments on DTLA 2040 Plan

Dear Ms. Arceneaux,

On behalf of FASTLinkDTLA and our board members and supporters, we are writing to add our comments to the current draft of the DTLA 2040 Plan in hopes of strengthening this document for Los Angeles' future health, affordability, and economic and mobility recovery after the COVID-19 pandemic.

The DTLA 2040 Plan is a crucial visionary document for Downtown Los Angeles. We support the Planning Department's goal of making Downtown Los Angeles (DTLA) a compact, active, multi-income, fully accessible community that is also an international visitor destination. We applaud the elimination of parking minimums to encourage more transit use, so that more people may live, work, shop, recreate, learn and enjoy the cultural, sports and entertainment in DTLA.

In order to deliver this laudable vision, we urge the Planning Department to eliminate height restrictions and use restrictions, especially adjacent to current and future transit. We also urge that the Planning Department include all of the proposed and entitled mobility projects in the DTLA 2040 Plan in order to receive the maximum amount of federal, state, local and private funding for crucial zero-emission transportation projects, such as the fully entitled EV LA Streetcar, Metro's Regional Connector and West Santa Ana Branch rail projects, the proposed new 6th Street Station in the Arts District, the proposed aerial tram, and expanded LADOT and Metro's EV bus network. We also ask that commensurate transit-oriented related zoning are enhanced along these routes and adjacent to these projects to make more jobs, housing, retail, entertainment venues and parks are accessible in DTLA without requiring a car.

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Specific recommendations for the DTLA 2040 Plan

We write today to provide comments on the DEIR for the DTLA 2040 Plan, expressing our concerns that certain elements included in the current version of the DTLA 2040 Plan will severely impact the City of Los Angeles' and Downtown Los Angeles (DTLA)'s ability to:

1. Recover from the severe economic and development impacts due to the COVID-19 pandemic, including DTLA's recovery of the 22 million visitors and \$10 billion in visitor-related spending that DTLA experienced in its 2019 record-breaking year.
2. Meet state and regional goals to build 455,000 new residential units in LA over the next 8 years – 120,000 of these units are expected to be built in DTLA.
3. Address climate change through new transit-oriented residential and job development
4. Position DTLA to receive the maximum amount of federal, state, local and private funding for crucial zero-emission transportation projects such as the LA Streetcar, West Santa Ana Branch, the proposed aerial tram from Union Station to Dodger Stadium, new 6th Street Station in the Arts District, and LADOT and Metro's expanded EV bus network.
5. Support a safe walking, transit and driving and parking experience for all in DTLA
6. Create a robust Enhanced Infrastructure Finance District (EIFD) as DTLA once had through the former Community Redevelopment Agency (CRA), which could be valued in the billions of dollars for DTLA, if the DTLA 2040 Plan creates an expedited development process at the scale originally proposed. EIFD funds can be used to address homelessness, create new affordable housing, and support the tremendous infrastructure needs of DTLA.

We ask the Planning Department to change the DTLA 2040 Plan to include the LA Streetcar on all maps, and to increase the number of residential units allowable by right in DTLA due to transit-adjacent zoning along the LA Streetcar route, and to expedite the entitlement process so that DTLA can fully recover more rapidly from the COVID-19 recession. (Please see attached LA Streetcar map)

The Los Angeles Streetcar is an important component of DTLA's EV mobility future

The zero-emission LA Streetcar will improve DTLA's mobility, transportation-oriented planning and accelerate DTLA's economic recovery due to the 2020 COVID-19 pandemic:

- The LA Streetcar is predicted to serve 6,000 to 8,000 riders per day – over 2 million rides per year – which reduces driving and gridlock on DTLA's streets. With cars running every 7 minutes at peak hours, every 10 minutes in the afternoons, and every 15 minutes in the evenings, Streetcars will encourage more people to ride transit rather than drive or own a car in DTLA (see attached map).
- LA Streetcar's 2014 economic study predicted \$1.1 billion in new DTLA construction and economic benefits.

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- Additionally, the LA Streetcar route links numerous hotels and visitor destinations to the LA Convention Center, which will assist our convention, visitor and restaurant economy in its recovery from the pandemic.
- The LA Streetcar connects to five Metro rail stations – Pico/Flower, 7th St/Metro Center, Pershing Square, Grand Park/Civic Center and the future Regional Connector station of 2nd/Broadway -- and numerous bus routes along the Streetcar route.
- The LA Streetcar route includes bike/scooter lanes on 7th Street, Figueroa, and 11th Street, and is one block away from the two-way Spring Street cycle tracks. People can bring their bicycles and scooters (and strollers and wheelchairs) directly onto the LA Streetcar.
- The LA Streetcar route will encourage streetcar riders to complement their trips with EV buses and active transportation modes.

Economic Recovery

As Downtown Los Angeles (DTLA) continues to suffer from the economic effects of the COVID-19 virus, we request that City Planning reevaluate the financial feasibility of the DTLA 2040 Community Benefits System in light of the current economic realities of COVID-19.

While we recognize that the virus-related recession will not be present during the entire life of the DTLA 2040 Plan, we know that it will take many years for DTLA's economic recovery, as DTLA experienced after the 2008 recession. The DTLA 2040 Plan's current affordable housing bonus provisions will make much of the planned development financially infeasible, and at minimum, Level 1 of the Community Benefits System should provide a more substantial FAR increase to support the feasibility of high-rise construction, which is usually the most cost-effective construction typology for dense urban areas like DTLA.

Residential Development and a Robust EIFD

We recommend that building height maximums and live-work requirements in the Arts District and Fashion District be eliminated. We also recommend that the base Floor Area Ratio (FAR) calculations which were reduced in the Historic Core, Fashion District, Chinatown and Little Tokyo be restored, and that mixed income and mixed-use housing development be supported in all of these areas.

Without these changes to height and mixed income units, DTLA will not be able to create the 120,000 transit-oriented residential units envisioned for DTLA in the Regional Housing Needs Assessment (RHNA) and included in the recently approved Southern California Association of Governments (SCAG) Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS).

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The City is in the process of creating an Enhanced Infrastructure Finance District (EIFD) in DTLA, which will allow the City to estimate future property tax revenue and bond against future property tax increment in order to support crucial homeless and affordable housing and infrastructure development necessary to fully recover from the COVID-19 recession. Allowing for mixed income development in all areas of DTLA will ensure that many income levels would benefit from transit, services and amenities and promote greater recovery of restaurant and retail options throughout DTLA. In addition, mixed-income projects are more likely to be financially feasible and stay on the property tax rolls, thereby further contributing to tax increment financing in the future EIFD.

As DTLA experienced with the Community Redevelopment Agency (CRA) before it was dissolved, the greater the allowable development in an area combined with an expedited development process, the greater the tax increment investments that can be made to address DTLA's myriad housing and mobility needs in the future EIFD planned for DTLA. We support specific provisions for spending EIFD revenues to fund affordable and homeless housing.

We urge these changes in height limits and use restrictions to be reconsidered immediately, as the reduction in allowable development not only affects residential and commercial development, but also affects the ability to garner state and federal funds for the transportation projects needed to support a clean, efficient mobility network.

Transportation and Transit-Oriented Development

We recommend that the Planning Department add the fully entitled zero-emission LA Streetcar, proposed Metro West Santa Ana Branch, proposed Metro 6th Street Station in the Arts District, and new bus-only lanes for the expanded EV bus network onto the DTLA 2040 maps, and expand the transit-oriented development potential near these transportation projects.

As greater development is planned in conjunction with these transportation investments, the City of Los Angeles and Metro's transportation funding applications will be more competitive for federal and state funds. In addition, SCAG's RTP/SCS and the Executive Orders of Governor Gavin Newsom require that new development be located near transit to reduce vehicle miles traveled (VMT) and improve our air quality. Expanding the development potential along zero emission transit routes like the one entitled for the LA Streetcar will also add to EIFD calculations discussed above, while garnering the crucial federal and state financing needed to complete these projects.

We appreciate the Planning Department for reiterating that DTLA is the economic and development engine of Los Angeles, and for envisioning the ways that the DTLA 2040 Plan can stoke this engine. Uniting a strong DTLA 2040 Plan with a robust EIFD and targeted multi-modal clean transportation investment strategy, DTLA can avoid a deep recession and help the City of Los Angeles address its growing budget deficit and tourism and unemployment challenges.

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page 4

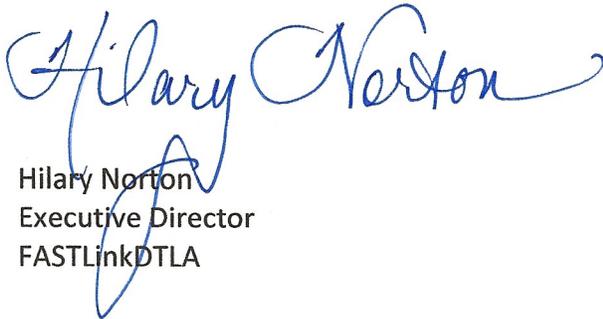
We urge the Planning Department to address the recommended changes to the DTLA 2040 Plan so that DTLA can recover from this recession and emerge even stronger than before and make all of the preparations necessary to host international events such as the Superbowl of 2022 and many other events culminating in the Olympics and Paralympics in 2028.

We look forward to implementing this amended plan with the Planning Department, and fast-tracking Los Angeles' economic, transportation, housing and visitor recovery together.

If you have any questions, please do not hesitate to contact me at (213) 448-2900.

Thank you for your time and consideration.

Warm regards,



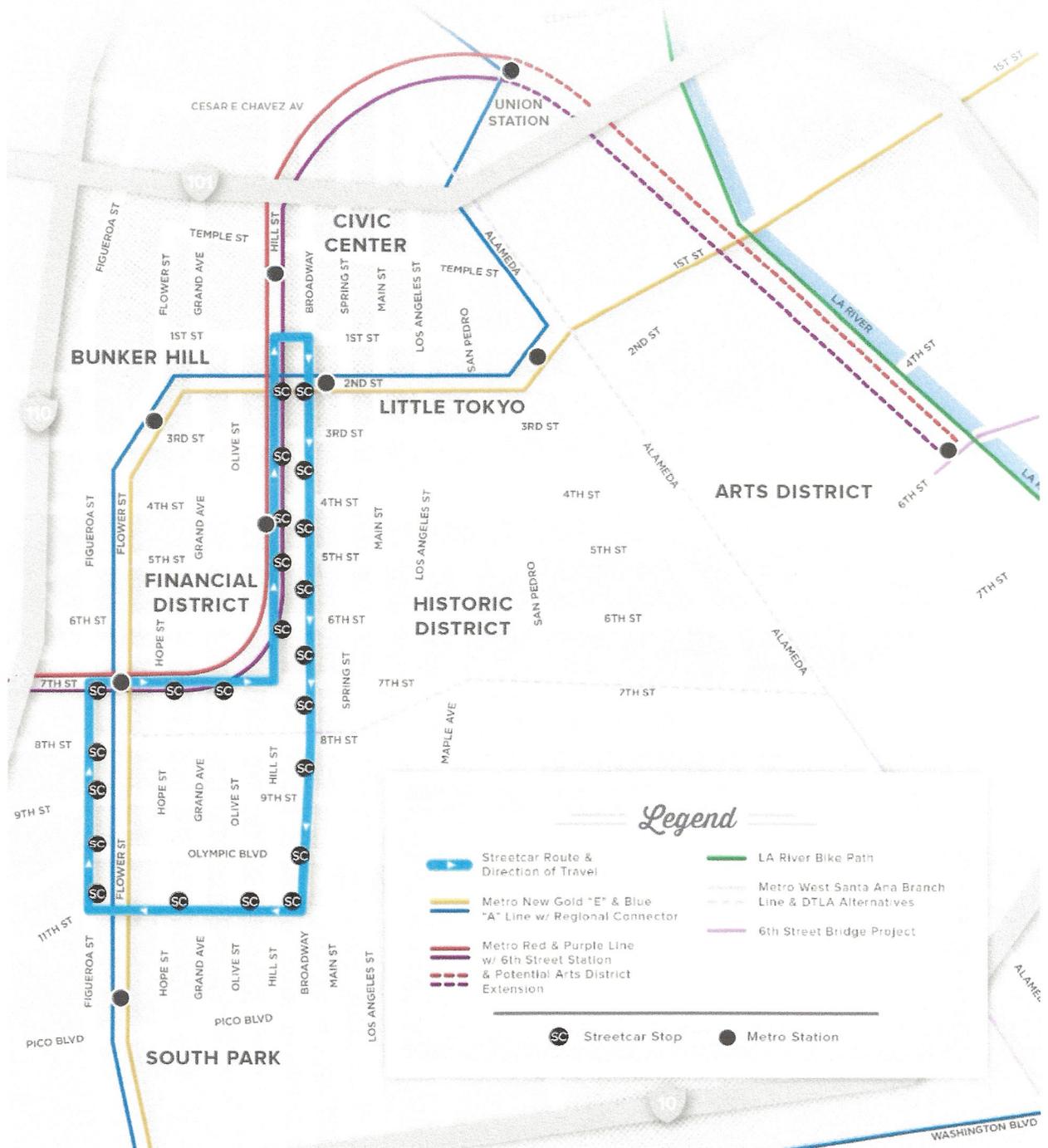
Hilary Norton
Executive Director
FASTLinkDTLA

Project Map on next page

CC: Vince Bertoni, GM, LA City Planning Department
Councilmember Kevin de Leon and all City Councilmembers
Mayor Eric Garcetti
Seleta Reynolds, GM, LADOT
Phil Washington, CEO, Metro

Los Angeles

STREETCAR!



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November 30, 2020

Brittany Arceneaux
City Planner/DTLA 2040 Project Manager
Los Angeles City Planning
200 N. Spring Street, Room 667
Los Angeles, CA 90012

RE: LA FASHION DISTRICT'S COMMENTS ON THE REVISED PUBLIC REVIEW DRAFT DTLA 2040 PLAN

Dear Brittany,

The future of Downtown Los Angeles is exciting! The LA Fashion District Business Improvement District (BID) is a private, non-profit corporation created and maintained by local property owners. We serve the LA Fashion District community—businesses, employees, residents, visitors, and more. Our mission is to help facilitate and provide a **clean, safe, friendly, and prosperous place to work, shop, live and do business**. We serve a 107-block area generally between 7th Street to the north and the Santa Monica 10 Freeway to the south, and from Broadway to the west and Paloma Street to the east.

We reviewed the latest version of the Downtown Community Plan, Zoning Code, and Community Benefits Program (collectively referred to as the *Public Hearing Draft DTLA 2040 Plan*, dated November 2020) and the Draft Environmental Impact Report (dated August 6, 2020). The LA Fashion District appreciates the amount of thoughtful planning, creativity, and focus on positive change that City staff, decision makers, local business and property owners, and the community have given to this planning process over the past six years.

We share the City's vision, as articulated in the draft Plan, to **"...promote a dynamic, healthy, and sustainable Downtown core that is well connected to and supports the City of Los Angeles and the region."** The draft Plan outlines a bold vision for accommodating anticipated growth through 2040 while creating a livable and healthy community for workers, residents, and visitors. The goals and policies described in this Plan focus on continuing Downtown's remarkable renaissance and promoting it as a center of innovation in the public and private realms. The draft Plan also seeks to address many of the challenges facing Downtown and the larger region, such as climate change, housing demand and affordability, and a shifting economy, through strategies that guide thoughtful growth.

We appreciate the City's Planning Department working closely with our District, other Downtown Districts, local business and property owners, and the community to address many of our concerns in the latest draft Plan. This includes easing restrictions on daycares and new schools (e.g., no longer



requiring Conditional Use Permits for these uses within commercial areas), removing above grade parking from Floor Area Ratio (FAR) calculations, and increasing the minimum size of Live/Work units to 750 square feet. These changes provide needed flexibility to ensure property owners and developers can create projects that meet the City's vision for Downtown.

We do, however, have deep concerns regarding several aspects of the policy and zoning approach for the LA Fashion District as currently reflected in the draft Plan. Particularly, the sweeping reductions to base Floor Area Ratios (FARs) for new projects that were made between the August and November 2020 versions of the draft Plan. The approach the City seems to be taking in the current draft Plan is to "restrict" higher density housing projects to only those that provide additional community benefits (which can significantly increase the overall project costs and reduce its feasibility), rather than "promoting" needed housing projects by allowing higher FARs. Given our current housing crisis, ongoing COVID Pandemic, and pending economic downturn, **additional flexibility for business and property owners to provide needed housing is critical** so we can respond to future market shifts and challenges while achieving the City's bold vision for Downtown.

While the LA Fashion District supports most of the revised draft Plan (November 2020), we submit the following **specific concerns and requests for changes to the City for review and consideration**. We strongly feel that these focused changes to the draft Plan are necessary for the City and community to fully realize the vision for the future of our beloved Downtown.

1. REMOVE RESTRICTIONS ON NEW HOUSING

The western edge of the Fashion District between Broadway and Santee Street shares similar zoning with the eastern edge of South Park, which is flexible and allows a range of housing types. However, the Fashion District east of Santee Street is largely zoned for hybrid-industrial and industrial-mixed uses which are more restrictive, with the exception of City Market that sits in the middle of the Fashion District and is zoned for an array of mixed residential and commercial uses. In general, the City's proposed zoning approach for the Fashion District is to allow a wide mix of uses in the western portion and gradually increase more restrictive industrial-focused zoning eastward.

Amid our current housing crisis, precluding housing in some areas and limiting housing to Live/Work or PSH units in other areas is **counterproductive and contrary to our common goal of making Downtown the place for housing people at all income levels**. While recent updates to the draft Plan would technically allow more types of housing in the Fashion District, there is a requirement that projects with housing be coupled with a minimum of 1.0 FAR of office or light industrial space, unless they are Live/Work. As there is very little demand for new office or light industrial uses in these areas, and with the uncertainties around these uses resulting from COVID, we believe the code as written will have the effect of limiting development in hybrid industrial areas to Live/Work.

We believe the current approach as outlined in the Plan will result in exclusionary and economically stratified growth since Live/Work units are typically more expensive to build than traditional housing units. This more restrictive approach to housing will likely result in a less integrated or inclusive community. Additionally, as the fashion industry undergoes major changes and as employment shrinks, the future economic vitality of the LA Fashion District neighborhood is dependent on welcoming a variety of new residents.



Request: *The LA Fashion District requests the City to consider allowing more flexibility and a greater range of housing types in the Plan. Specifically, we request the City to adopt an amendment to the Framework Element in tandem with DTLA 2040, which will allow for far greater flexibility to plan hybrid industrial areas as mixed-use neighborhoods with a diversity of housing types. In lieu of amending the Framework Element, we believe that there could still be more flexibility for different housing types in Hybrid-Industrial areas. In the absence of an amendment to the Framework Element, we recommend that for projects that include more conventional multi-family housing, set the commercial space requirement as 10 percent of the building area, which will create fairer rules for all projects than the current requirement that is based on lot size, especially those that don't use a site's full FAR.*

2. INCREASE MINIMUM FLOOR AREA RATIOS

We are very concerned with the recent changes to the DTLA 2040 Plan whereby base Floor Area Ratios (FAR) in the Fashion District have been dramatically reduced. The changes shown in the November 2020 Public Hearing Draft are substantial: from 7.0 and 6.0 to 3.0 -- **a 60 percent and 50 percent base FAR decrease respectively within the Fashion District.** While we understand the intent of these changes is to ideally increase usage of the Community Benefits System, we are very concerned that this is too dramatic of a change that tips the scales of project economics to be economically infeasible. These are walkable, transit-rich areas where we want to promote growth, but the reductions in base FAR create a de facto scenario where the FAR is too low to build a viable project under the base FAR allowances on the one hand while simultaneously placing a large financial onus on projects to obtain bonus FAR via the Community Benefits System.

Because the Level 1 affordable housing FAR bonus is 35 percent of the base FAR, the Level 1 bonus is necessarily reduced as well (for example, a 35 percent bonus on 6.0 base FAR is an additional 2.1 FAR, but is only an additional 0.7 FAR on a 2.0 base FAR). The October 2019 financial feasibility analysis of the Community Benefits System prepared by HR&A Advisors for the City specifically highlights this issue on a large swath of the Fashion District leading into the Historic Core, where most of these FAR changes would apply, "are unlikely to support larger high-rise developments until market performance matures further, and thus are not able to support public benefits to the same degree as Place Types with strong submarkets."

Request: *The LA Fashion District requests the City to firmly maintain base Floor Area Ratios (FARs) as proposed in the August 2020 draft DTLA 2040 Plan. A failure to do so would diminish the development feasibility of new affordable and market-rate housing projects and hinder the City's ability to implement the vision as outlined in the DTLA 2040 Plan.*



3. ALLOW HOTELS IN THE IX2 USE DISTRICT

We feel that new hotels will support economic growth and help create more urban energy in the Fashion District. We are excited to see the City remove the limitation on new hotels and motels in the IX2 Use District. Limiting hotels does not support the economic goals for Downtown or the vision to transform the area into a vibrant, 24/7, active urban environment. Hotels are an important asset for Downtown because they support tourism, increase the local tax base, and promote positive “after hour” activity and energy.

Request: *The LA Fashion District requests the City to allow new or expanded hotels within the IX2 Use District without restrictions on the total number of hotel room keys.*

4. INCREASE BUILDING HEIGHTS

The DTLA 2040 Plan as proposed would impose base and bonus (with use of the Community Benefits Program) maximum building height limits in many parts of the LA Fashion District, including the new DM4 Form District. We have concerns with the proposed building height limits, particularly in areas near transit stations as we are investing hundreds of billions of dollars in building out our transit system and as these are exactly the areas we need our city to grow to become less car-dependent and more affordable and sustainable. It is also critical to demonstrate our commitment to growth in areas near transit as we compete for infrastructure funding from the State and Federal governments.

Our understanding is that height limits were proposed in these areas to preserve their character and historical context. We treasure Downtown’s historic neighborhoods, communities and buildings, and we want to see them continue to play a vital part of its future. Yet, blanket height limits are not an appropriate tool for neighborhood preservation. These districts and buildings should be considered through the appropriate historic preservation and landmarking processes, which is much more targeted and would not needlessly inhibit growth on sites that might not have historic or cultural significance. Additionally, we believe that context-sensitive growth can occur with the use of urban design tools like setbacks and street frontage requirements.

Furthermore, in many cases, the proposed building height limits are not aligned with the economic realities of development and the constraints of relative construction materials. For instance, mixed-use buildings can generally be built with wood frame over a concrete parking and retail podium to a maximum of eight stories under the building code, and buildings made of concrete and steel can be taller but typically need to be a minimum of 20 stories to be financially feasible and justify the additional costs of the more expensive labor and building materials. Some of the proposed base and bonus height limits in areas of Downtown are 12 stories and 15 stories, respectively, and 15 and 18 stories, respectively. With a few exceptions for large sites that can accommodate a lot of building capacity in terms of width, most mixed-use developments will not even be able to build to the base height limits of 12 and 15 stories, and these height limits will act like seven- and eight-story limits in reality.



The draft Plan also creates scenarios where height limits preclude maximizing a site's allowable FAR, like the MLN1 Form District which allows 6.0 FAR but limits buildings to a maximum of five stories. This means that the growth envisioned by the plan may not actually occur and the resulting community benefits will also not be delivered.

Request: *The LA Fashion District requests the City to remove building height maximums within the DM4 Form District and instead utilize FAR, setback, and frontage requirements to govern building height and massing, and that historic communities be considered instead through the established historic preservation processes. This approach will promote context-sensitive growth and density near transit, respect neighborhood character and appropriately preserve historical assets in a way that reflects the economic realities of development.*

5. ENSURE COVID PANDEMIC RELATED FLEXIBILITY

The COVID pandemic has dramatically affected local manufacturing businesses, offices, stores, and restaurants. Projects and uses that were previously financially viable have greatly diminished in value. We are hopeful that Downtown's economic prospects will strengthen as restrictions are lifted, successful vaccines are obtained and made widely available, and perceptions of urban life improve. However, it may be some time before circumstances get better, and the draft Plan must be sensitive to this economically vulnerable context if we are to continue to see new growth and community benefits in Downtown. While we do not know where the future will take us when it comes to permanent social distancing, we encourage the City to permit and allow the quick implementation of outdoor shopping (on sidewalks), street closures for outdoor markets and dining, and other temporary spaces within the public realm to help private companies.

Request: *The LA Fashion District requests the City streamline temporary street closures to allow outdoor markets, shopping/retail, and dining spaces. These spaces should be encouraged even if they will have temporary impacts on traffic or transit operations. And these spaces shall be compliant with all Los Angeles County health requirements around social gathering and social distancing.*

6. ALLOW MARKET RATE HOUSING IN THE CENTRAL CITY EAST AREA

The current draft Plan prohibits market rate housing in a specific part of Downtown between 5th and 7th Streets and San Pedro Street and Central Avenue. The intent of this provision is likely to preserve existing affordable housing and single room occupancy hotels, but it is unnecessary given covenants, the Residential Hotel Conversion and Demolition Ordinance, and the Wiggins Settlement. This area contains the largest concentration of unsheltered homeless people in the nation and is in an area of extreme poverty and housing need. Banning market rate housing would further concentrate poverty in this area of Downtown and run counter to stated draft Plan goals of inclusive and diverse neighborhoods.

Imposing this provision would only freeze the current conditions and further a failed policy of containment. We believe this policy also directly conflicts with the Federal mandate to Affirmatively Further Fair Housing (AFFH). Affordable housing is an important part of DTLA 2040, and it should be integrated throughout the plan area. We strongly support housing opportunities for all incomes across



Downtown as the primary tool to address the complicated and extensive challenges of homelessness and poverty in our city.

It is important to recognize that the Community Plan, which is a land use and zoning plan, cannot alone address the challenges of this area. Truly meeting the needs of this area requires a much broader effort that involves mental health, workforce development and social services, which will take coordination from multiple departments and organizations, which we support and encourage. As such, we echo the Central City East Association's "The Voices of Central City East" report (October 16, 2020) and share their concerns and long-term vision for the area.

***Request:** The LA Fashion District requests the City to remove the ban on market rate housing from 5th to 7th Streets and San Pedro Street to Central Avenue, and instead urge City Planning to consider ways the area's zoning can be tailored to produce mixed-income developments and socioeconomic integration and inclusion.*

7. ADOPT DEIR ALTERNATIVE #3 TO ADDRESS THE ONGOING HOUSING CRISIS AND SCAG RHNA MANDATES

As the Southern California Association of Governments (SCAG) finalizes the 6th Cycle Regional Housing Needs Assessment (RHNA), it is clear that the City of Los Angeles will be responsible for delivering an incredible amount of new housing by the order of more than 455,000 units between 2021 to 2029. The magnitude of this housing target cannot be overstated – in the City's history, only 420,000 units were built at the peak of housing production over the course of 20 years between 1960 to 1980. At the same time, homelessness in the city continues to increase, growing by over 14 percent last year reaching more than 41,000 unhoused people living in the city, 16 percent of whom are in Downtown, which is the largest concentrated street homeless population in the nation. While this housing goal stands out as seemingly astronomical, in reality it reflects a persistent housing and homelessness crisis that has long been one of the major issues facing the city and region. Unfortunately, this issue has historically been left largely unaddressed by solutions of the necessary scale.

The DTLA 2040 Plan notes that SCAG projects that Downtown will make up over 20 percent of the city's growth over the next two decades, which is a significant share of the City's RHNA target and means that **at least 12,000 units per year on average will need to be built in Downtown over the next eight years alone**. As the region's transit and job hub, Downtown must play an outsized role in meeting this ambitious goal, requiring DTLA 2040 to provide substantial capacity for new housing growth at all income levels. Alternative 3 of the DEIR is the superior alternative as it would enable the greatest growth and housing production.

The Draft Environmental Impact Report (DEIR) for this plan was contemplated prior to the COVID-19 pandemic and resulting economic depression. We believe much of the plan as proposed is a great improvement to DTLA's land use and planning framework and we are appreciative of City Planning's outreach and engagement. We recognize that DTLA 2040 is an enormous undertaking for City Planning as it will be the first community plan to implement the new code. We appreciate the significant resources dedicated to the plan's development. We are pleased that DTLA continues to be the City's laboratory for new ideas. DTLA 2040 must go even farther to promote a bold and exciting future for our city center.



Request: *The LA Fashion District requests the City adopt DEIR Alternative 3 as the preferred option to allow for the greatest development capacity and flexibility for Downtown. Adoption of Alternative 3 allows for the greatest housing and development capacity and flexibility to spur Downtown’s recovery and best positions the heart our city for private and public investment.*

8. MAKE THE COMMUNITY BENEFITS PROGRAM MORE FINANCIALLY FEASIBLE

We are concerned about specific provisions that impact the financial feasibility of utilizing the bonus FAR, particularly for high-rise projects at this immensely economically challenging time for Downtown. The economic fallout from the pandemic presents major issues for building in Downtown, but it is important to note that the Community Benefits System, primarily the affordable housing bonus provisions, poses challenges for the financial feasibility of development even in strong economic conditions. Level 1 of the Community Benefits Program is essentially aligned with the City’s Affordable Housing Density Bonus and Tier 1 of the Transit Oriented Communities (TOC) Program in terms of the percentage of affordable housing required by income level (with the exception of options for Deeply Low and Moderate Income housing under the draft Plan). However, the FAR bonus for providing affordable housing is 35 percent, which is at the lowest end of the City’s affordable housing incentive programs in alignment with the Density Bonus.

Request: *The LA Fashion District requests the City change the Level 1 of the DTLA 2040 Community Benefits Program provide a more substantial FAR increase to support the feasibility of high-rise construction. We also believe that the ability to contribute an in-lieu payment or partner with an affordable housing provider to provide affordable units off-site are good, important features of the Community Benefits System that must be maintained as they offer necessary flexibility.*

Thank you for your consideration on these important items. We look forward to further discussions and refinement of the visionary DTLA 2040 Plan.

Rena Masten Leddy
Executive Director
www.fashiondistrict.org

January 13, 2021

Brittany Arceneaux, City Planner
Department of City Planning
City of Los Angeles
200 North Spring Street, Room 667
Los Angeles, CA 90012

Sent via email due to the COVID-19 Pandemic to:

Brittany.arceneaux@lacity.org

Downtownplan@lacity.org

Dear Ms. Arceneaux,

I write on behalf of the Building Owners and Managers Association Greater Los Angeles (BOMA/GLA), one of the largest advocacy organizations in the commercial real estate industry, representing over hundreds of property owners and operators with over 135 million square feet of office space. We work tirelessly to ensure that our industry's voices are heard in policy spaces and are committed to the future of Downtown Los Angeles.

We are writing to you with suggestions regarding the City of Los Angeles Planning Department's DTLA 2040 plan. As an organization representing a significant amount of commercial property owners and managers in the Downtown Los Angeles corridor, we have seen first-hand the economic toll COVID-19 has had on our local businesses and tenants.

As the COVID-19 pandemic continues to create long-term economic impacts in our region, the City must strive to bolster Downtown's resiliency.

Since the onset of the pandemic, tenant occupancy has been as low as 10% in many major office buildings. With retail and restaurant establishments depending on a full and stable office workforce, many of them have lost considerable income for their establishments.

This is but one metric of the paradigm shift that COVID-19 has posed for DTLA.

As such, DTLA 2040 must be revised in a way that recognizes the challenges created by COVID-19.

Therefore, we believe that the DTLA 2040 plan should be viewed as more than just a roadmap for development. The City should use the plan as a re-investment strategy for DTLA in the wake of the pandemic. As a tool of economic recovery and revitalization, an updated DTLA 2040 plan would be instrumental in promoting growth in the area.

In coordination with the Los Angeles County Business Federation, the Central City Association and FASTLinkDTLA, we strongly recommend the following:

1. Jumpstart DTLA's economic recovery as a compact, walkable, transit-oriented and inclusive urban center and international destination. In 2019, DTLA experienced a record-breaking 22 million visitors and \$10 billion in visitor-related spending. Yet in the wake of the COVID-19 pandemic, tourism is at a standstill, with nearly 500,000 people in the visitor and service industry out of work. DTLA office space vacancy pre-COVID

was around 15%. Today, office buildings are 30% occupied on a good day, and more typically 10-20% occupied due to COVID. This vacancy has reverberations for all service sectors that depend on office buildings full of employees and retail and restaurants full of customers.

2. Increase height limits to ensure that new housing and commercial projects can “pencil out.” Post-COVID-19, development funding is scarce and cities throughout the country are competing for private development dollars by providing expedited processes. In order to deliver mixed-income housing, height limits and densities should be maximized, rather than minimized.
3. Maximizing density and expediting development processes. This will benefit the City of Los Angeles budget, and benefit DTLA’s safety, equity, livability, mobility and environment. It will also benefit the future Enhanced Infrastructure Finance District (EIFD), currently in the planning process for DTLA. As DTLA experienced with the Community Redevelopment Agency (CRA) before it was dissolved, the greater the allowable development in an area combined with an expedited development process, the greater the tax increment yield which expands funding resources for investments to address DTLA’s myriad housing, homeless and mobility needs in and around the future EIFD planned for DTLA.
4. The DTLA 2040 plan must allow the maximum zoning envelope and create an expedited pathway to deliver housing for all incomes, especially along current and planned transit routes.
5. Allow for many different housing options, including diverse typology, rather than requiring only single income development or single use typologies such as live/work in particular areas of DTLA. Increase opportunities for home ownership. More broadly, there should be a general increase in housing production opportunities such as increasing height limits, reducing entitlement hurdles, increasing streamlined processes for housing of all kind (affordable and market-rate) and reducing development fees. To deliver 120,000 mixed-income units in DTLA, residential development needs the fewest entitlement restrictions, as long as affordable and workforce housing can be included or contributed to as part of each project.

The revitalization of DTLA is a necessity for broader economic recovery if we want it to be equitable — it’s the once and future epicenter of LA’s housing, it has the biggest capacity for commercial activity per capita, and its capacity for density has essential sustainability implications.

DTLA was on track to become the urban core we all envisioned. COVID-19 was sadly a major setback as residents began to leave. Getting DTLA — and by extension LA in general from an economic, sustainability, and homelessness perspective — back on the track requires the suggested revisions by us, CCA, BizFed, and FastLinkDTLA.

Together, we can make DTLA both the epicenter of our economic recovery and vibrance for the coming decades.

Sincerely,



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Re: DTLA 2040 Plan

To the LA City Planning Department

With the release of the DTLA 2040 Plan, stakeholders in Chinatown have been combing through the document with the hopes that it centers community members and residents. Chinatown Community for Equitable Development (CCED) believes, among other values, in the self-determination of its community members, the cultural integrity and preservation of Chinatown, truly affordable housing, and businesses that cater toward residents. This is due to its long history as an undervalued/divested neighborhood consistently failed by systemic racism in city planning that nonetheless provided a haven for Chinese working-class immigrants and other BIPOC communities.

Chinatown Community for Equitable Development has a number of concerns with the presenting DTLA 2040 document, particularly the following points:

- While there are numerous proposed housing-related policies, the plan itself does not center low-income and affordable housing as an imperative to the development of the neighborhood, instead referring to housing oriented toward “a full range of income levels”
- Renters, which comprise a significant portion of the community, are not centered
- For the Chinatown-specific goals, there are certain some mention of the necessity to maintain architectural design, and “courtyard-style developments”, but it is absolutely crucial that there be supports for the businesses and the residents inside these buildings to remain in the community, lest the residents, the real heart of Chinatown, be gentrified out and developers succeed, at best, at culturally appropriating East Asian architecture

Multiple stakeholders in the Chinatown community have put forth their own visions of what the downtown core, but specifically Chinatown, could look like. A coalition between SEACA, Little Tokyo Service Center, and LA CAN) released the Central City United People’s Plan, while Chinatown Sustainability Dialogue Group also released comments on the 2040 plan. Elements of both are strongly supported by Chinatown Community for Equitable Development, and we urge the City of Los Angeles to thoroughly incorporate them in future drafts of the DTLA 2040 Plan.

Through the Central City People’s Plan, we applaud the emphasis on preserving and creating truly affordable, quality housing; on treating the unhoused with respect and dignity, and providing them with services; and an economy where everyone who works downtown can afford to live downtown;

Through the Chinatown Sustainability Dialogue’s Plan, we support the plan’s sustainability of Chinatown through the cultural/ethnic flavor of the area, and the emphasis on cultural/historic

resources that encourage artistic, historic, cultural resources to be preserved, and the existence of park/green space for pleasant walking and other outdoor activities. We support the inclusion of a legacy business program to support longtime and community-facing businesses in the community.

Both plans provide important suggestions to the City of Los Angeles' DTLA 2040. CCED in particular supports the prioritization of the extremely low affordable housing, or housing that is *actually* affordable, and housing that allows renters and other community members to remain in the community, and supporting community and cultural components of the neighborhood.

To ensure the neighborhood and community remain a vibrant, sustainable, and live-able place for its current residents, they must be seen, heard, and centered in this process.

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