

Communication from Public

Name: LA Fashion District Business Improvement District
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Comments for Public Posting: The attached letter is submitted on behalf of the Stakeholders of the LA Fashion District Business Improvement District.



March 11, 2024

Craig Weber
Principal City Planner
Los Angeles City Planning
200 N. Spring Street, Room 667
Los Angeles, CA 90012

RE: LA FASHION DISTRICT'S ADDITIONAL COMMENTS AND CONCERNS ON THE DTLA 2040 PLAN

Dear Craig,

Thank you again for your continued discussions on the LA Fashion District's community planning and design concerns. I know we are mutually committed to ensuring Downtown LA remains a healthy and thriving place for businesses, tenants, workers, residents, and visitors. 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 several years.

Following up on our most recent discussion, we are concerned about a few remaining items related to the recently adopted DTLA 2040 Plan.



1. ESTABLISHMENT OF AN EFFECTIVE ADAPTIVE REUSE APPROVAL PROCESS

The City of Los Angeles' new approach to Adaptive Reuse is encouraging, especially if it results in streamlined conversions of older buildings into housing units. This is something that is a combined goal of our BID and the City. One concern we do have is that the emerging process is complex and may be challenging for building and property owners to navigate.

The City of San Francisco recently adopted a Downtown Adaptive Reuse Program that establishes clear guidelines and incentives for repurposing commercial buildings as housing. Their program includes incentives (in the form of code reductions) and waivers that can also apply to the expansion of the building. A project in San Francisco can add up to 33 percent additional volume to the building if it is converting to housing. The waivers are applicable to both the existing buildings and building expansions. To help clarify the review and approval process, the City of San Francisco is currently preparing an info sheet that is envisioned to be an easy guide for property owners and developers to use to navigate the permitting process. The City of Los Angeles should take a similar approach to help clearly convey to building and property owners the approval process for adaptive reuse projects. More information on the San Francisco process is available at: <https://sfplanning.org/project/downtown-adaptive-reuse-program>

As part of the implementation of the DTLA 2040 Plan, the LA Fashion District requests the City to develop marketing materials and/or a dedicated webpage with resources for building and property owners to use to help streamline and expedite adaptive reuse projects. It is critical that the City create a predictable and efficient approval process for Adaptive Reuse projects that are focused on regulatory and permit incentives (e.g., project streamlining). This will help expedite housing production in DTLA – meeting both City and property owner goals.

2. NON-DUCTILE BUILDING EXEMPTIONS

On October 13, 2015, the City of Los Angeles passed the LA Non-Ductile Reinforced Concrete Ordinance. The City's mandatory non-ductile concrete ordinance applies to existing buildings that have unreinforced concrete construction and/or a construction permit applied for prior to January 13, 1977. It is estimated that approximately 1,500 buildings in Los Angeles fall within the scope of this ordinance. Even if the building has not been identified by the City, any concrete building with a permit application submitted before January 13, 1977 is subject to the retrofit ordinance.

Currently, the City requires that non-ductile concrete building retrofits adhere to the timeline shown below. Orders to Comply were issued to building owners during or before January 2018. Once the Order has been received, the subsequent deadlines are initiated. Considering that most orders to comply were issued not later than January 2018, the timeline for compliance with submittal of the City's NDC Checklist has largely lapsed.

While we understand the safety needs associated with rehabilitating non-ductile buildings in LA, we do want to emphasize that the costs associated with these improvements fall solely on the building/property owner. These costs are high and very impactful on building owners and tenants and are costs that may never be recuperated. The Fashion District requests the City to reevaluate the timeline requirements to allow flexibility for building owners that have started the process in good faith but need time to identify and build funding resources. The City can further support these efforts by working with building owners to identify other outside funding or grant sources that could be used to



retrofit buildings. If concessions are not made, then we would see these requirements leading to many historical buildings being demolished and rebuilt.

MILESTONE	REQUIREMENT
BEGIN PROCESS	Order received by building owner
3 YEARS AFTER ORDER	Complete and submit the City's Non-Ductile Concrete Building Checklist, which is required to be completed and signed by a licensed engineer or architect
10 YEARS AFTER ORDER	Obtain one of the following: 1. Permit for seismic retrofit of the building in conformance with the NDC Ordinance OR 2. Permit for demolition of the building OR 3. City's approval of proof that the building was previously retrofitted in conformity with certain older requirements of the Los Angeles Building Code OR 4. City's approval of proof that the building was previously retrofitted in conformity with the engineering requirements of the NDC Ordinance OR 5. City's approval of a structural analysis showing that the building in its existing condition meets the engineering requirement of the NDC Ordinance
25 YEARS AFTER ORDER	Complete one of the following: 1. Construction of the seismic retrofit OR 2. Demolition

3. LOADING BAY AND FREIGHT ELEVATOR REQUIREMENTS

The PLUM Committee, during its meeting on April 24, 2023, recommended the preservation of all loading bays and freight elevators in all existing buildings that have garment manufacturing uses, or are adjacent to garment manufacturing uses, as well as all new construction, regardless of the building occupant uses. These proposed amendments were made primarily in response to requests from the Garment Worker Center, who were adamant that a minimum of 1.0 FAR towards productive space is necessary to promote manufacturing uses and support the continued success of the garment industry in this part of Downtown.

A blanket requirement that all existing, repurposed, and new buildings in the IX2 and IX3 zones must include a freight elevator seems arbitrary and is not tied to specific uses or the individual needs of a building. Other parts of the City's code approach elevator requirements specific to the use of the building. For example, Section 4C.3.2. (Short-Term Bicycle Parking Design) states that "...elevators providing access for bicyclists shall be sized to accommodate standard adult bicycle dimensions with both wheels on the floor." The code does not require bicycle sized elevators in every building, it only requires them in buildings that provide access for bicyclists or internal bicycle storage. In addition, the updated City code focuses productive space on the first or in some cases second floor of new buildings using the 1.0 FAR requirement. This severely limits the actual utility of freight elevators in new construction of multi-use, multi-story buildings.

Our concern is that there is no clear nexus established for requiring expensive, hard to maintain freight elevators in all buildings with historical garment manufacturing uses or adjacent to garment manufacturing. Again, it is simply an arbitrary requirement that does not support the garment industry, building tenants, or building owners.

As such, the Fashion District requests the City to remove any mandate to require loading docks, loading bays, or freight elevators within existing and new buildings in the IX2 and IX3 Zones (near historical



garment manufacturing uses or not). We also request the City to approach elevator design, sizing, and capacity requirements fairly and consistently throughout the Code, tying them to specific uses, activities, and requirements within individual buildings and aligning the requirements more closely to the California Building Code.

We appreciate the opportunity to present our concerns and submit these additional comments and suggestions. Thank you for your consideration of these important items. We look forward to further discussions and refinement of the DTLA 2040 Plan.

Cordially,

A handwritten signature in black ink, appearing to read "Anthony Rodriguez", written over a faint horizontal line.

Anthony Rodriguez
Executive Director
www.fashiondistrict.org