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## Downtown Community Plan: Support PLUM Recommendations regarding Garment Workers and Hotels (CF #22-0617)

1 message

**Charlie Carnow** <ccarnow@unitehere11.org>

Tue, May 2, 2023 at 8:04 PM

To: "paul.krekorian@lacity.org" <paul.krekorian@lacity.org>, councilmember.harris-dawson@lacity.org, councilmember.lee@lacity.org, councilmember.rodriquez@lacity.org, councilmember.price@lacity.org, contactcd4@lacity.org, councilmember.park@lacity.org, councilmember.mcosker@lacity.org, "councilmember.kevindeleon@lacity.org" <councilmember.kevindeleon@lacity.org>, cd10@lacity.org, councilmember.yaroslavsky@lacity.org, councilmember.soto-martinez@lacity.org, councilmember.blumenfield@lacity.org, councilmember.hernandez@lacity.org, clerk.cps@lacity.org  
Cc: sherilyn.correa@lacity.org, Gerald Gubatan <Gerald.Gubatan@lacity.org>, Helen Campbell <helen.campbell@lacity.org>, Karo Torossian <karo.torossian@lacity.org>, Danielle Wilson <danielle.wilson@unitehere11.org>, Marissa Nuncio <mnuncio@garmentworkercenter.org>, Daisy Gonzalez <daisyg@garmentworkercenter.org>

Honorable Council President and Councilmembers,

The proposed Downtown Community Plan Update ("CPU" or "Plan") aims to encourage the development of badly needed housing, especially affordable housing in Downtown Los Angeles. We salute the plan's historic inclusionary zoning requirements and more contemporary approach to land use. We urge the Los Angeles City Council to approve the PLUM Committee's unanimous recommendation to adopt hotel and garment workers' requests to require a hotel conditional use permit ("CUP") and a variety of strategies to preserve garment jobs, including the requirement for 1 FAR of productive space in IX3. Please see the attached letter by the Garment Workers Center and UNITE HERE Local 11.

Thank you,  
Charlie Carnow

Charlie Carnow, Research Analyst  
UNITE HERE Local 11  
Phone: (818) 635-3034  
Email: [ccarnow@unitehere11.org](mailto:ccarnow@unitehere11.org)

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 **GWCUH11LetterDTLA2040.pdf**  
176K



# UNITE HERE! LOCAL 11

May 2nd, 2023

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

***Delivered via electronic mail.***

**RE: CF # 22-0617- Downtown Community Plan**

**Dear Council President Krekorian:**

The proposed Downtown Community Plan Update (“CPU” or “Plan”) aims to encourage the development of badly needed housing, especially affordable housing in Downtown Los Angeles. We salute the plan’s historic inclusionary zoning requirements and more contemporary approach to land use. Thus, we urge the Los Angeles City Council to approve the PLUM Committee’s unanimous recommendation to adopt hotel and garment workers’ requests to require a hotel conditional use permit (“CUP”) and a variety of strategies to preserve garment jobs, including the requirement for 1 FAR of productive space in IX3.

Specifically, we thank PLUM for unanimously voting to:

1. Require a CUP appealable to City Council for any hotels (now called lodging under Re-Code) in all places where hotels are permitted by the plan. This would allow for consideration of project impacts on housing, transit, local hiring, the appropriateness of the use, among other required findings.
2. Prohibit new hotel development in IX zones.
3. Require 1 FAR of productive space for residential projects in the IX3 zone as well as loading zones/freight elevators to ensure the functionality of the productive space. This will ensure we do not lose productive capacity to demolition and instead, beautifully integrate housing and productive uses.
4. Adopt further Garment Worker Center (GWC) modifications for the DTLA 2040 Community Plan approved by PLUM on Monday, April 25, 2023, including: expansion of CPIO Subarea A.5, prohibition on development of Stadium Uses and Entertainment Venues in new construction or in existing buildings containing industrial uses in the IX2, IX3, and IX4 Use Districts, appropriate limitation of productive space to industrial uses, and improved findings to stop conversion of viable industrial space to joint living and working quarters. PLUM also recommended adoption of related follow up items that fall outside of DTLA 2040, including studies and report backs from Los Angeles Economic Workforce and Development Department (EWDD) and other relevant departments on the policy, programmatic, and funding opportunities available and feasible to develop to support and bolster the fashion industry in and around downtown.

While maintaining only a 1.0 FAR job productive use set aside won't prevent the garment industry from being fully pushed outside of DTLA, it is the minimum acceptable requirement for new developments in IX3 in order to preserve the diversity of the Fashion District's current ecosystem of commercial, industrial, and residential uses. We highlight that IX3 is only a small subsection of the overall plan, yet a vital area for LA's garment industry. Any reduction in or elimination of required job productive use set aside, such as the previously recommended 0.5 FAR proposed in the Planning Director's Memo, is unacceptable as it would cause even further disruption of this ecosystem, replacing it with live-work studios and hotels, and other residential land uses incompatible with either the industrial needs of the Fashion District, or the affordability needs of LA's unhoused and low-wage worker communities.

In closing, we appreciate the opportunity to provide these comments. The PLUM Committee approved the appropriate balance between the incentivization of new housing and the protection of garment industry jobs, and the City Council should similarly adopt these recommendations.

Sincerely,

A handwritten signature in black ink, appearing to be 'Marissa' followed by a stylized 'N' and 'C'.

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Marissa Nuncio, Executive Director  
Garment Worker Center

A handwritten signature in black ink, appearing to be 'Kurt' followed by a long, horizontal, wavy line.

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Kurt Petersen, co-President  
UNITE HERE, Local 11



City Clerk Council and Public Services <clerk.cps@lacity.org>

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## Downtown Community Plan: Vote For PLUM Recommendations on Hotels and Garment Workers (#22-0617)

2 messages

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**Marlene Grijalva Bermudez** <info@email.actionnetwork.org>  
Reply-To: mrgb5959@gmail.com  
To: clerk.cps@lacity.org

Wed, May 3, 2023 at 8:35 AM

Honorable Los Angeles City Council,

I strongly support the PLUM Committee's recommendations on hotels, including a hotel CUP with rigorous findings and its support for garment workers. Thanks to the work of community members and elected officials, the Downtown Community Plan will promote affordable housing, protect jobs, and ensure needed public input on hotel projects. I also support requiring 1 FAR of industrial space in housing projects in the Fashion District which is smart policy that will mean jobs and housing come together and protect the future of the Garment District.

Please vote for the Downtown Community Plan

Marlene Grijalva Bermudez  
mrgb5959@gmail.com  
1929 Avalon St  
Los Angeles, California 90039

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**Boris pineda** <info@email.actionnetwork.org>  
Reply-To: borispineda2329123291@gmail.com  
To: clerk.cps@lacity.org

Wed, May 3, 2023 at 8:36 AM

Honorable Los Angeles City Council,

I strongly support the PLUM Committee's recommendations on hotels, including a hotel CUP with rigorous findings and its support for garment workers. Thanks to the work of community members and elected officials, the Downtown Community Plan will promote affordable housing, protect jobs, and ensure needed public input on hotel projects. I also support requiring 1 FAR of industrial space in housing projects in the Fashion District which is smart policy that will mean jobs and housing come together and protect the future of the Garment District.

Please vote for the Downtown Community Plan

Boris pineda

borispineda2329123291@gmail.com

3807 W Victory Blvd, Apt B

Burbank, California 91505-1468



City Clerk Council and Public Services <clerk.cps@lacity.org>

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## Fwd: DTLA 2040 Comments (CF 22-0617)

1 message

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**Joe Luckey** <joe.luckey@lacity.org>

Wed, May 3, 2023 at 8:42 AM

To: City Clerk Council and Public Services <clerk.cps@lacity.org>

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

From: **LA Fashion District BID** <jasmine@fashiondistrict.org>

Date: Wed, May 3, 2023 at 7:53 AM

Subject: DTLA 2040 Comments (CF 22-0617)

To: <joe.luckey@lacity.org>

May 2, 2023

City Council President Paul Krekorian

200 N. Spring Street

Los Angeles, CA 90012

RE: DTLA2040 Community Plan (Council File 22-0617)

Dear Council President Krekorian,

As a longtime Fashion District stakeholder, I am deeply concerned about the proposed amendments by the Planning and Land Use Management (PLUM) Committee to the DTLA2040 community plan. I am disappointed that the PLUM committee has ignored the economic feasibility analysis provided by City Planning, experts from HR&A, and testimony from other stakeholders who have an interest in preserving the ecosystem of sectors and industries that exist/are emerging in the Fashion District and who want to allow our community to bare its weight in response to the housing and homelessness crisis. The proposed amendments will have several negative implications for the Fashion District, particularly affordable housing production that is critically needed in the region.

The proposed regulations by the PLUM committee include a 1.0-floor area ratio (FAR) requirement of light industrial space and the need for freight elevators, loading docks, and loading bays for new developments in the IX2/IX3 Use Districts; both these provisions will have

severe impacts on any future Fashion District developments. These requirements will impede housing development, ultimately harming the Fashion District's economy and its ability to create a projected 12,000 new housing units, including 1,000-2,000 rent-restricted affordable units.

According to the analysis prepared by HR&A, development in the Fashion District is already economically challenging. For a project with an industrial space set-aside to be viable, rents would need to increase by 15-18%, or construction costs would need to decrease by 18-22%. This is more than double the change needed for a project without the set-aside. Additionally, there is already an 18% vacancy rate for existing manufacturing space in the area, which is high compared to the regional 3.5% industrial vacancy rate, indicating an oversupply of such space in the Fashion District that is already modestly priced at a monthly average of \$2/sq ft.

To protect the vitality of the Fashion District, the City Council should:

Remove or reduce to 0.5 FAR requirement for Productive Space in Use District IX2/IX3; remove the elevators and loading docks requirement.

The LA Fashion District has been experiencing a manufacturing exodus since the late 1990s. While industry regulations have sought rightful equity in manufacturing, this catalyzed many companies to move out of City, State, and Country. Buildings dedicated to manufacturing and wholesale currently have a vacancy rate of 18%, indicating an oversupply. Additionally, HR&A has stated that "new residential construction subject to the requirement is unlikely to occur on a larger scale absent significant changes in market conditions..." making "it challenging to achieve policy objectives related to housing production and industrial preservation." The Council should continue pursuing the targeted programmatic recommendations by Councilmembers de Leon and Hernandez; These motions will better support the garment manufacturing industry and jobs than zoning regulations.

Remove CUP requirements and prohibitions on conversion projects (housing, live/work units, hotels, social service facilities, etc.) in the IX2 and IX3 Use Districts for buildings that have sat vacant or underutilized at a threshold of 60% for 2+ years.

The adaptive reuse ordinance was instated to address buildings plagued by high vacancy rates that could be reused to address the needs of communities. That has never been truer than in the Fashion District. Buildings with extended vacancies (no longer viable) have become housing and bridge home shelters. In the IX2/IX3 areas, where there are many restrictions on conversion/adaptive reuse, the overall vacancy rate (per square foot) is a crushing 22%, and of that space, 27% has been vacant for 1000+ days. The City is in a housing crisis and experiencing highly unfavorable market conditions. The HR&A experts have indicated that the feasibility of new projects will be unlikely in the short term, so we cannot allow vacant spaces to sit unused for an extended term.

Do not exclude Creative Office as a qualifying use for the "work" portion of new Live/Work units and allow it to count toward the required FAR in Use Districts IX2/IX3/IX4 Productive Space. The Fashion Industry has been moving towards marrying production space with office. The most significant indicator is Adidas and Spark's entry into the community, bringing 800+ employees. Both are now tenants in a CX3 area that allows for the coexistence of office and production in the same space/unit, opting out of the IX2/IX3 Use Zones. In addition, given the transition to working from home during COVID-19, which has continued, we must reinstitute "office" for live/work units to allow for changes in the workforce.

Remove mandatory inclusionary housing requirements and continue incentivizing affordable housing production through the Community Benefits Program. As long as the Hybrid Industrial area is a 3:1 base FAR, it cannot bear mandatory inclusionary housing AND employment space obligations. Per HR&A, it is entirely unfeasible. The City Council must decide whether projects in Hybrid Industrial should reserve space for an industry when there is already an oversupply or provide the ability to create housing during a citywide shortage.

Do not prohibit Entertainment Venues in new construction or existing buildings containing industrial use in the IX2/IX3 Use Districts that have sat vacant or underutilized at a threshold of 60% for 2+ years. As previously stated, buildings that experience high long-term vacancy rates should be allowed to meet a community's use demands, including entertainment venues. COVID-19 demonstrated that access to live music is just as vital to the mental fitness of a community as public space. Prohibiting industries in the Fashion District prevents our community from developing a healthy and vibrant neighborhood.

Increase the base FAR to 6:1 in Form District HM1, HB1, DM1, DM3, and Use Districts CX3 and IX2/IX3. The delta between base and bonus in our district is too great, especially when DTLA2040 proposes mandatory inclusionary housing AND a production FAR requirement for new developments. In the short term, projects in the Hybrid Industrial area will find it infeasible to address both. Thus, an increase in base FAR is needed to address possible mandates.

DTLA2040 has the potential to provide 12,000 units of housing with 1000-2000 rent-restricted affordable units in the Fashion District and DTLA. I encourage the City Council to implement a community plan that ensures feasible projects and housing/preservation goals can be met. This plan must be flexible, inclusive, and equitable to all industries and stakeholders in our neighborhood. Please consider the needs and concerns of our community. You can help ensure the Fashion District remains a vital and dynamic part of the City's fabric for years.



Thank you for your attention to this matter.

Sincerely,

Nadine Buki  
nbuki@me.com  
508 E. 8th St  
Los Angeles, CA 90015



## Fwd: DTLA 2040 community plan

1 message

**Joe Luckey** <joe.luckey@lacity.org>

Wed, May 3, 2023 at 8:44 AM

To: City Clerk Council and Public Services <clerk.cps@lacity.org>

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

From: **Recycle2 Riches** <recycle2riches@gmail.com>

Date: Tue, May 2, 2023 at 7:20 PM

Subject: DTLA 2040 community plan

To: <Lizzeth.rosales@lacity.org>

Hello Lizzeth,

I was previously working with Victoria. My name is Ashleigh and I am the founder of Recycle2Riches. It is a nonprofit here in LA that is changing the culture of consumption.

I have a personal request about the DTLA 2040 community plan. Can you please make sure that Mayor Karen Bass sees the attached letter? I know that Tomorrow, May 3 @ 10 AM is the final City Council vote on the DTLA 2040 Community Plan. Last week, the Planning and Land Use Management Committee (PLUM) unanimously voted to adopt the Garment Worker Centers recommendations! I want to ensure that all city council members vote to maintain these modifications that will preserve, protect, and incentivize the garment industry.

Please have Mayor Karen Bass read this letter and Vote to maintain these modifications to the DTLA 2040 Community Plan.

I will be in touch soon regarding another project that Recycle2Riches is collaborating on with colleges in California. Thank you for consistently following up and staying connected with Recycle2Riches' community efforts in LA. We truly appreciate your work with the Mayor's office to promote California's sustainability goals.

If you have any inquiries or partnership proposals, don't hesitate to contact me.

Stay connected,

--

**ASHLEIGH DAWSON**

CEO + President of R2R

+1 213-712-0930

[Book a Meeting](#)

[www.Recycle2Riches.org](http://www.Recycle2Riches.org)





**Lizzeth Rosales** (*she/her*)

Director of Environmental Justice

Office of Mayor Karen Bass

Sign up for updates from the Mayor [here](#)



City Clerk Council and Public Services <clerk.cps@lacity.org>

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## Yes on Downtown Community Plan: Listen to Community Voices on Hotels and Garment Jobs (#22-0617)

3 messages

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**Jazmine Pacheco** <info@email.actionnetwork.org>

Wed, May 3, 2023 at 8:34 AM

Reply-To: jazminepacheco23@gmail.com

To: clerk.cps@lacity.org

Honorable Los Angeles City Council,

Please vote to support the Downtown Community Plan, specifically PLUM's recommendations on hotels and the Fashion District. The Downtown Community Plan promotes affordable housing, protects jobs, and ensures the community gets a say on hotel projects with rigorous findings that help promote local hiring, local small businesses and other important goals. I also support PLUM's Decision to require 1 FAR of industrial space in housing projects in the Fashion District which is smart policy that will mean jobs and housing come together and protect the future of the Garment District. Thank you.

Jazmine Pacheco

jazminepacheco23@gmail.com

12846 Ledford St.

BALDWIN PARK, California 91706

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**Maria Trujillo** <info@email.actionnetwork.org>

Wed, May 3, 2023 at 8:38 AM

Reply-To: mariatrujillo6612@gmail.com

To: clerk.cps@lacity.org

Honorable Los Angeles City Council,

Please vote to support the Downtown Community Plan, specifically PLUM's recommendations on hotels and the Fashion District. The Downtown Community Plan promotes affordable housing, protects jobs, and ensures the community gets a say on hotel projects with rigorous findings that help promote local hiring, local small businesses and other important goals. I also support PLUM's Decision to require 1 FAR of industrial space in housing projects in the Fashion District which is smart policy that will mean jobs and housing come together and protect the future of the Garment District. Thank you.

Maria Trujillo  
mariatrujillo6612@gmail.com  
5709 Everett Avenue  
Maywood California , California 90270

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**Clara Lars** <info@email.actionnetwork.org>  
Reply-To: clarita0813lara@gmail.com  
To: clerk.cps@lacity.org

Wed, May 3, 2023 at 8:46 AM

Honorable Los Angeles City Council,

YesPI vote to support the Downtown Community Plan, specifically PLUM's recommendations on hotels and the Fashion District. The Downtown Community Plan promotes affordable housing, protects jobs, and ensures the community gets a say on hotel projects with rigorous findings that help promote local hiring, local small businesses and other important goals. I also support PLUM's Decision to require 1 FAR of industrial space in housing projects in the Fashion District which is smart policy that will mean jobs and housing come together and protect the future of the Garment District. Thank you.

Clara Lars  
clarita0813lara@gmail.com  
15604 Daisy Meadow st  
Santa Clarita C A, California 91387



City Clerk Council and Public Services <clerk.cps@lacity.org>

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## Fwd: DTLA 2040 Comments (CF 22-0617)

1 message

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**Joe Luckey** <joe.luckey@lacity.org>

Wed, May 3, 2023 at 8:55 AM

To: City Clerk Council and Public Services <clerk.cps@lacity.org>

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

From: **LA Fashion District BID** <jasmine@fashiondistrict.org>

Date: Wed, May 3, 2023 at 8:42 AM

Subject: DTLA 2040 Comments (CF 22-0617)

To: <joe.luckey@lacity.org>

May 2, 2023

City Council President Paul Krekorian

200 N. Spring Street

Los Angeles, CA 90012

RE: DTLA2040 Community Plan (Council File 22-0617)

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Thank you for your attention to this matter.

Sincerely,

Ariana Nussdorf  
ariananussdorf@gmail.com  
746 S Los Angeles St. # 902  
Los Angeles, CA 90014



City Clerk Council and Public Services <clerk.cps@lacity.org>

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## The Downtown Community Plan, a Win for Los Angeles (#22-0617)

1 message

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**Ramon Lacayo** <info@email.actionnetwork.org>  
Reply-To: Lacayoramon415@gmail.com  
To: clerk.cps@lacity.org

Wed, May 3, 2023 at 9:37 AM

Honorable Los Angeles City Council,

We need housing, not more luxury commercial uses and I strongly support the Hotel CUP with rigorous findings recommended by the PLUM Committee. This a plan that promotes affordable housing, protects and encourages our manufacturing industries, and makes sure the public has meaningful input on hotels. I also support requiring 1 FAR of industrial space in housing projects in the Fashion District which is smart policy that will mean jobs and housing come together and protect the future of the Garment District. Thank you

Ramon Lacayo

[Lacayoramon415@gmail.com](mailto:Lacayoramon415@gmail.com)

5960 Gifford Ave Apt A

[Huntington Park, California 90255](#)



City Clerk Council and Public Services <clerk.cps@lacity.org>

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## Yes on Downtown Community Plan: Listen to Community Voices on Hotels and Garment Jobs (#22-0617)

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**Claudia Abaloni** <info@email.actionnetwork.org>

Wed, May 3, 2023 at 9:44 AM

Reply-To: Abaloni5403@yahoo.com

To: clerk.cps@lacity.org

Honorable Los Angeles City Council,

Please vote to support the Downtown Community Plan, specifically PLUM's recommendations on hotels and the Fashion District. The Downtown Community Plan promotes affordable housing, protects jobs, and ensures the community gets a say on hotel projects with rigorous findings that help promote local hiring, local small businesses and other important goals. I also support PLUM's Decision to require 1 FAR of industrial space in housing projects in the Fashion District which is smart policy that will mean jobs and housing come together and protect the future of the Garment District. Thank you.

Claudia Abaloni

[Abaloni5403@yahoo.com](mailto:Abaloni5403@yahoo.com)

4025west Adams Blvd

Los Angeles , California 90018



City Clerk Council and Public Services <clerk.cps@lacity.org>

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## Yes on Downtown Community Plan: Listen to Community Voices on Hotels and Garment Jobs (#22-0617)

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**Eduardo Inocencio** <info@email.actionnetwork.org>

Wed, May 3, 2023 at 9:56 AM

Reply-To: inocencioeduardo@yahoo.com

To: clerk.cps@lacity.org

Honorable Los Angeles City Council,

Please vote to support the Downtown Community Plan, specifically PLUM's recommendations on hotels and the Fashion District. The Downtown Community Plan promotes affordable housing, protects jobs, and ensures the community gets a say on hotel projects with rigorous findings that help promote local hiring, local small businesses and other important goals. I also support PLUM's Decision to require 1 FAR of industrial space in housing projects in the Fashion District which is smart policy that will mean jobs and housing come together and protect the future of the Garment District. Thank you.

Eduardo Inocencio

[inocencioeduardo@yahoo.com](mailto:inocencioeduardo@yahoo.com)

7909 Topanga Canyon Blvd

[Canoga Park , California 91304](#)



City Clerk Council and Public Services <clerk.cps@lacity.org>

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## Downtown Community Plan: Vote For PLUM Recommendations on Hotels and Garment Workers (#22-0617)

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**Jorge L Villa Castillo** <info@email.actionnetwork.org>

Wed, May 3, 2023 at 10:05 AM

Reply-To: jorgevmv1@hotmail.com

To: clerk.cps@lacity.org

Honorable Los Angeles City Council,

I strongly support the PLUM Committee's recommendations on hotels, including a hotel CUP with rigorous findings and its support for garment workers. Thanks to the work of community members and elected officials, the Downtown Community Plan will promote affordable housing, protect jobs, and ensure needed public input on hotel projects. I also support requiring 1 FAR of industrial space in housing projects in the Fashion District which is smart policy that will mean jobs and housing come together and protect the future of the Garment District.

Please vote for the Downtown Community Plan

Jorge L Villa Castillo

[jorgevmv1@hotmail.com](mailto:jorgevmv1@hotmail.com)

11736 Tina St

[Norwalk, California 90650](#)