

Communication from Public

Name: Jasmine Ramos

Date Submitted: 05/03/2023 01:13 PM

Council File No: 22-0617

Comments for Public Posting: Good Morning Councilmembers, My name is Jasmine Ramos and I'm the Policy & Civic Affair Manager for the LA Fashion District BID. I'm here to speak on item 54 and general public comment. As a representative of the LA Fashion District, I want to address the negative impact that the proposed PLUM amendments will have on development, housing, and jobs in our community. We strongly request that the productive space requirement be lowered to 0.5 FAR, as suggested by the Department of City Planning, and that the requirements for loading docks and freight elevators be removed. According to HR&A, the experts contracted by the City, these amendments would make new projects infeasible. There is already an 18% vacancy rate in buildings designated for manufacturing and wholesale in the IX2/IX3 area, which is high compared the regional 3.5% industrial vacancy rate. This indicates that there is an over abundance of space in the Fashion District and the proposed amendments will only exacerbate this issue. Furthermore, the PLUM amendments will put 12,000 new housing units, 2000 of which would be rent-restricted affordable units. These amendments will make it infeasible to build affordable housing in the area, limiting housing options for low income residents and workers. The Southern California Association of Governments (SGAG) has made it clear that the City of Los Angeles will be responsible for delivering 455,000 new housing units between 2021 to 2029. The city must do everything in its power to increase, encourage, and promote development of all housing types rather than hinder the ability to meet these goals. The proposed plan restricts housing developments in the areas in the Fashion District, delaying the growth needed by the city to meet housing goals. The Fashion District is a major economic driver for the city, but the PLUM amendments further restrict zoning, removing all flexibility and fluidity, which will prevent new development and future job opportunities. Developers and investors will choose to avoid the Fashion District altogether if the PLUM amendments are passed. This will lead to lost investment opportunities, community benefits, and the opportunity to create a health community. We urged council to reconsider the PLUM amendments and continue to pursue the recommendations made by the Planning Department and the targeted programmatic resolutions presented by Councilmembers Hernandez and de León

that will provide real solutions that will positively impact the garment industry, low wage workers, and our community. Thank you!

Communication from Public

Name: Carlin Glucksman

Date Submitted: 05/03/2023 01:18 PM

Council File No: 22-0617

Comments for Public Posting: I am Carlin Glucksman. My family have been stakeholders in the LA Fashion District for almost 70 years. I'd like to speak on Item 54 and General Public comment. The garment industry was my family's 'bread and butter' for decades. Its disappearance has left us with properties to sustain our families future. A majority of our tenants are garment industry jobbers with restricted means to pay market rate rents causing many to have gone out of business, relocate out of California or offshore. While other DTLA property owners have had the ability to adapt their [legacy] properties for other uses our area is being sought as a frozen capsule in time by well meaning, but uninvested, individuals and groups. I was horrified to hear at the prior meeting the Planning Department recommendation to designate Skid Row as a District restricting construction to homeless and low income housing. My parents were Holocaust survivors and what I heard smacks of creating a Ghetto or "Projects". As an architect who also studied Urban Planning I understand the purpose of housing those with needs that can be easily served within a manageable 'zone'. But it's not only demeaning for intended residents to be lumped into a restrictive community which supports a pattern of behavior, but will critically affect adjacent property values further degrading this larger area. I urge the City Council and the Planning Department to adopt far less restrictive zoning of the General Plan for the LA Fashion District BID so that our Family's investments of almost 70 years may support us in adapting to the changing needs of Los Angeles's population and businesses, and doesn't bind our families future so we all may thrive rather than be throttled. Carlin Glucksman UCLA March. '95

Communication from Public

Name: LA Fashion District Stakeholders
Date Submitted: 05/03/2023 01:21 PM
Council File No: 22-0617
Comments for Public Posting: Please see below for LA Fashion District Stakeholder comments

Subject: DTLA 2040 Comments (CF 22-0617)

Date: Wednesday, May 3, 2023 at 1:16:40 PM Pacific Daylight Time

From: LA Fashion District BID

To: info

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.

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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.

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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,

Brian Taban
brian@jadeent.com
1100 Wall Street
Los Angeles, CA 90015

Subject: DTLA 2040 Comments (CF 22-0617)

Date: Wednesday, May 3, 2023 at 1:11:41 PM Pacific Daylight Time

From: LA Fashion District BID

To: info

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,

Tom Keefer
tom@newmart.net
127 E. 9th Street, Ste 801
Los Angeles, CA 90015

Subject: DTLA 2040 Comments (CF 22-0617)

Date: Wednesday, May 3, 2023 at 12:04:21 PM Pacific Daylight Time

From: LA Fashion District BID

To: info

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.

Stop killing LA!!!!

Sincerely,
Roxanna Faithful

Roxanna Faithful
Roxannald@gmail.com
105 venice
Los Angeles, CA 29104

Subject: DTLA 2040 Comments (CF 22-0617)

Date: Wednesday, May 3, 2023 at 9:25:44 AM Pacific Daylight Time

From: LA Fashion District BID

To: info

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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Sincerely,

Kayhan Shakib
kayhan@shakib.com
926 S. SAN PEDRO STREET, #2612
LOS ANGELES, CA 90015

Subject: DTLA 2040 Comments (CF 22-0617)

Date: Wednesday, May 3, 2023 at 9:03:24 AM Pacific Daylight Time

From: LA Fashion District BID

To: info

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,

Marisella Bodrero
hello@marisellabodrero.com
12652 Seacoast Pl
Los Angeles, CA 90094

Subject: DTLA 2040 Comments (CF 22-0617)

Date: Wednesday, May 3, 2023 at 8:43:04 AM Pacific Daylight Time

From: LA Fashion District BID

To: info

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
ariananusssdorf@gmail.com
746 S Los Angeles St. # 902
Los Angeles, CA 90014

Subject: DTLA 2040 Comments (CF 22-0617)

Date: Wednesday, May 3, 2023 at 7:53:38 AM Pacific Daylight Time

From: LA Fashion District BID

To: info

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,

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

Subject: DTLA 2040 Comments (CF 22-0617)

Date: Wednesday, May 3, 2023 at 7:49:50 AM Pacific Daylight Time

From: LA Fashion District BID

To: info

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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Sincerely,

Nadine Buki
nbuki@me.com
830 Wall St
Los Angeles, CA 90014

Subject: DTLA 2040 Comments (CF 22-0617)

Date: Tuesday, May 2, 2023 at 10:20:25 PM Pacific Daylight Time

From: LA Fashion District BID

To: info

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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Sincerely,

Behrooz Haverim
Behroozhaverim@gmail.com
106 E 17th st
los angeles, CA 90015

Subject: DTLA 2040 Comments (CF 22-0617)

Date: Tuesday, May 2, 2023 at 10:19:10 PM Pacific Daylight Time

From: LA Fashion District BID

To: info

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,

Matthew Haverim
mhaverim@gmail.com
953 santee st
los angeles, CA 90015

Subject: DTLA 2040 Comments (CF 22-0617)

Date: Tuesday, May 2, 2023 at 10:05:06 PM Pacific Daylight Time

From: LA Fashion District BID

To: info

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,

Jacqueline Sanchez
castillo_0608@hotmail.com
1245 N Rowan Ave
Los Angeles, CA 90063

Subject: DTLA 2040 Comments (CF 22-0617)

Date: Tuesday, May 2, 2023 at 9:01:24 PM Pacific Daylight Time

From: LA Fashion District BID

To: info

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,

Diane H. Pappas
dhpappas@gmail.com
1326 Santee Street

Diane Pappas
dhpappas@gmail.com
2472 Brigden Rd
Pasadena, CA 91104

Subject: DTLA 2040 Comments (CF 22-0617)

Date: Tuesday, May 2, 2023 at 8:55:43 PM Pacific Daylight Time

From: LA Fashion District BID

To: info

May 2, 2023

City Council President Paul Krekorian

200 N. Spring Street

Los Angeles, CA 90012

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Sincerely,

Iriet Adelberg
irieta@gmail.com
5198 Garrett Court
Hidden Hills, CA 91302

Subject: DTLA 2040 Comments (CF 22-0617)

Date: Tuesday, May 2, 2023 at 8:52:41 PM Pacific Daylight Time

From: LA Fashion District BID

To: info

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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Sincerely,

Kara Bartelt
kara.bartelt@thehox.com
1060 S Broadway
Los Angeles, CA 90015

Subject: DTLA 2040 Comments (CF 22-0617)

Date: Tuesday, May 2, 2023 at 5:33:57 PM Pacific Daylight Time

From: LA Fashion District BID

To: info

May 2, 2023

City Council President Paul Krekorian

200 N. Spring Street

Los Angeles, CA 90012

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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,

Randy Wior
randywior@gmail.com
1024 Santee st
Los Angeles, CA 90015

Subject: DTLA 2040 Comments (CF 22-0617)

Date: Tuesday, May 2, 2023 at 3:06:26 PM Pacific Daylight Time

From: LA Fashion District BID

To: info

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.

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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,
Linda Becker

Linda Becker
lmbecker233@gmail.com
808 Wall St.
LA, CA 90014

Subject: DTLA 2040 Comments (CF 22-0617)

Date: Tuesday, May 2, 2023 at 3:06:00 PM Pacific Daylight Time

From: LA Fashion District BID

To: info

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,

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

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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.

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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.

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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,

Elizabeth Zurita
elizabeth@fashiondistrict.org
818 S Broadway
Los Angeles, CA 90014

Subject: DTLA 2040 Comments (CF 22-0617)

Date: Tuesday, May 2, 2023 at 3:04:24 PM Pacific Daylight Time

From: LA Fashion District BID

To: info

April 3, 2023

Dear Planning and Land Use Management Committee (PLUM),

I would like to thank the City Planning Commissioners, the Department of City Planning, City Staff, and the members of this committee for developing the DTLA2040 proposal. As a stakeholder in the LA Fashion District, I want to express my thoughts on the impact that staff recommendations and the Director of Planning's report will have on the future of our community.

The LA Fashion District is a vital economic hub in Downtown Los Angeles, the City at large, and the region. Our neighborhood's DNA is in the fashion and flower industries. We take great pride in and never plan to divest from those identities. However, as the city continues to grow, evolve, and become a melting pot, it is clear that the Fashion District must adapt and change to meet the needs of industries and residents seeking to call our community home.

DTLA2040 has the potential to help guide this evolution in a positive direction. In particular, I am excited by the potential of easing restrictions on daycares/new schools, removing above-grade parking from FAR calculations, increasing the minimum size + removing FAR requirements for live/work units, and opening the door to flexibility for new residential in some areas.

To protect the vitality of the Fashion District, please:

Increase the base FAR to 6:1 in Form District HM1, HB1, DM1, DM3, and Use Districts CX3 and IX2/IX3. The delta between base and bonus in our district is too great, especially when DTLA2040 proposes mandatory inclusionary housing AND a production FAR requirement for new developments.

Do not exclude Creative Office as a qualifying use for the "work" portion of new Live/Work units and allow it to count toward the required FAR in Use Districts IX2/IX3/IX4 Productive Space. The Fashion Industry has been moving towards marrying production space with office. The most significant indicator is Adidas and Spark's entry into the community, bringing 800+ employees; both in what would be a CX3 area.

Remove CUP requirements and prohibitions on adaptive reuse/conversion projects (housing, live/work units, hotels, and social service facilities) in the IX2 and IX3 Use Districts. The adaptive reuse ordinance was meant to address buildings plagued by high vacancy rates that could be reused to address the needs of communities. That has never been truer than in the Fashion District! A building that has sat vacant or

underutilized at a threshold of 60% for 2+ years should be allowed new life/conversion without prohibitions.

Do not impose a minimum FAR requirement for Productive Space in Use District IX2/IX3; allow the Employment Incentive Area (subarea A.5) to be an anchor for production space. The LA Fashion District has been experiencing a production exodus since the late 1990s. While industry regulations have sought rightful equity in manufacturing, this catalyzed many companies to move out of City, State, and Country. Buildings dedicated to manufacturing and wholesale currently have a vacancy rate of 18%.

Allow new residential and residential conversions across all Use Forms (IX2/IX3) in the LA Fashion District. The City is in a housing crisis and experiencing highly unfavorable market conditions. With over 65,000 individuals experiencing homelessness in the city, we cannot prohibit new housing if we are to meet State and City housing goals.

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. I

Extend the Restaurant Beverage Area to include the entire Fashion District. Despite COVID-19, the Restaurant Industry has been resilient in our community. Many businesses adapted to take-out or Al Fresco, saving many coveted eateries from closure. Extending the restaurant beverage area will allow these businesses to tap into additional revenue that could help bridge the gap in loss during the height of closures. In addition, it will provide new restaurants with a streamlined alcohol approval process.

As we continue to the transition post-COVID-19, DTLA2040 has the potential to help guide this evolution of the Fashion District and DTLA in a positive direction. I encourage the PLUM committee to ensure that development plans are flexible, inclusive, and equitable to all industries and stakeholders in our neighborhood. Please consider the needs and concerns of the existing communities. You can help ensure the Fashion District remains a vital and dynamic part of the City's fabric for years.

Thank you for your work and attention to this matter.

Sincerely,

Estuardo Faena
estuardo@fashiondistrict.org
818 S Broadway
Los Angeles, CA 90005

Subject: DTLA 2040 Comments (CF 22-0617)

Date: Tuesday, May 2, 2023 at 2:11:35 PM Pacific Daylight Time

From: LA Fashion District BID

To: info

May 1, 2023

Dear Planning and Land Use Management Committee (PLUM),

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

- DTLA 2040 should provide as much flexibility as possible for buildings to change and convert to new uses. Projects in Downtown should not be subject to Site Plan Review – we want to encourage more housing and innovative design. There should be no reason for projects to have unnecessary extra review and delays if they otherwise comply with zoning.
- Requiring hotels to get CUPs goes against the City's long standing tourism policies including a goal of 8,000 hotel rooms near the Convention Center and the Tourism Master Plan. Requiring CUPs for hotels is a dramatic policy change that has not had any public discussion. I ask that the plan be changed to encourage hotel development across Downtown.
- Living closer to work assists with traffic and better economics for workers. The Fashion District is projected to provide 12,000 new housing units, 2,000 of which would be rent-restricted affordable units. This is a critical area to address our housing crisis, but this can only happen if projects are financially feasible. Requirements for productive space, loading docks, and freight elevators are prohibitive.
- Increasing the minimum size, removing FAR requirements for live/work units, and opening the door to flexibility for new residential in some areas are steps in the right direction.
- Increase the base FAR to 6:1 in Form District HM1, HB1, DM1, DM3, and Use Districts CX3 and IX2/IX3. The delta between base and bonus in our district is too great, especially when DTLA2040 proposes mandatory inclusionary housing AND a production FAR requirement for new developments.
- Do not exclude Creative Office as a qualifying use for the "work" portion of new Live/Work units and allow it to count toward the required FAR in Use Districts IX2/IX3/IX4 Productive Space. The Fashion Industry has been moving towards marrying production space with office. The most significant indicator is Adidas and Spark's entry into the community, bringing 800+ employees; both in what would be a CX3 area.
- Remove CUP requirements and prohibitions on adaptive reuse/conversion projects (housing, live/work units, hotels, and social service facilities) in the IX2 and IX3 Use Districts. The adaptive reuse ordinance was meant to address buildings plagued by high vacancy rates that could be reused to address the needs of communities. A building that has sat vacant or underutilized at a threshold of 60% for 2+ years should be allowed new life/conversion without prohibitions.
- Do not impose a minimum FAR requirement for Productive Space in Use District IX2/IX3; allow the Employment Incentive Area (subarea A.5) to be an anchor for production space. The LA Fashion

District has been experiencing a production exodus since the late 1990s. While industry regulations have sought rightful equity in manufacturing, this catalyzed many companies to move out of City, State, and Country. Buildings dedicated to manufacturing and wholesale currently have a vacancy rate of 18%.

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

As we continue to the transition post-COVID-19, DTLA2040 has the potential to help guide this evolution of DTLA in a positive direction. I encourage the PLUM committee to ensure that development plans are flexible, inclusive, and equitable to all industries and stakeholders.

Thank you for your work and careful consideration.

Sincerely,
Blair Besten

Blair Besten
blair@historiccore.com
453 South Spring Street
Los Angeles, CA 90013

Communication from Public

Name: Boris Mayzels

Date Submitted: 05/03/2023 09:47 AM

Council File No: 22-0617

Comments for Public Posting: Dear Planning and Land Use Management Committee (PLUM),
As a stakeholder in the Downtown, I want to express my following thoughts on the Director of Planning's report will have on the future of our community:

- DTLA 2040 should provide as much flexibility as possible for buildings to change and convert to new uses. Projects in Downtown should not be subject to Site Plan Review – we want to encourage more housing and innovative design. There should be no reason for projects to have unnecessary extra review and delays if they otherwise comply with zoning.
- Requiring hotels to get CUPs goes against the City's long standing tourism policies including a goal of 8,000 hotel rooms near the Convention Center and the Tourism Master Plan. Requiring CUPs for hotels is a dramatic policy change that has not had any public discussion. I ask that the plan be changed to encourage hotel development across Downtown.
- Living closer to work assists with traffic and better economics for workers. The Fashion District is projected to provide 12,000 new housing units, 2,000 of which would be rent- restricted affordable units. This is a critical area to address our housing crisis, but this can only happen if projects are financially feasible. Requirements for productive space, loading docks, and freight elevators are prohibitive.
- Increasing the minimum size, removing FAR requirements for live/work units, and opening the door to flexibility for new residential in some areas are steps in the right direction.
- Increase the base FAR to 6:1 in Form District HM1, HB1, DM1, DM3, and Use Districts CX3 and IX2/IX3. The delta between base and bonus in our district is too great, especially when DTLA2040 proposes mandatory inclusionary housing AND a production FAR requirement for new developments.
- Do not exclude Creative Office as a qualifying use for the "work" portion of new Live/Work units and allow it to count toward the required FAR in Use Districts IX2/IX3/IX4 Productive Space. The Fashion Industry has been moving towards marrying production space with office. The most significant indicator is Adidas and Spark's entry into the community, bringing 800+ employees; both in what would be a CX3 area.
- Remove CUP requirements and prohibitions on adaptive reuse/conversion projects (housing, live/work units, hotels, and social service facilities) in the IX2 and IX3 Use Districts. The adaptive reuse ordinance was meant to

address buildings plagued by high vacancy rates that could be reused to address the needs of communities. A building that has sat vacant or underutilized at a threshold of 60% for 2+ years should be allowed new life/conversion without prohibitions. · Do not impose a minimum FAR requirement for Productive Space in Use District IX2/IX3; allow the Employment Incentive Area (subarea A.5) to be an anchor for production space. The LA Fashion District has been experiencing a production exodus since the late 1990s. While industry regulations have sought rightful equity in manufacturing, this catalyzed many companies to move out of City, State, and Country. Buildings dedicated to manufacturing and wholesale currently have a vacancy rate of 18%. · Remove mandatory inclusionary housing requirements and continue incentivizing affordable housing production through the Community Benefits Program. If the Hybrid Industrial area is a 3:1 base FAR, it cannot bear mandatory inclusionary housing and employment space obligations. · Extend the Restaurant Beverage Area to include the entire Fashion District. Despite COVID-19, the Restaurant Industry has been resilient in parts of Downtown. Many businesses adapted to take-out or Al Fresco, saving many coveted eateries from closure. As we continue to the transition post-COVID-19, DTLA2040 has the potential to help guide this evolution of DTLA in a positive direction. I encourage the PLUM committee to ensure that development plans are flexible, inclusive, and equitable to all industries and stakeholders. Thank you for your work and careful consideration. Sincerely, Boris Mayzels

Communication from Public

Name: ADCCLA

Date Submitted: 05/03/2023 09:40 AM

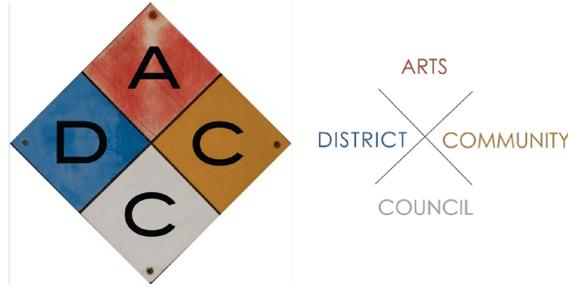
Council File No: 22-0617

Comments for Public Posting: May 3, 2023 City Council JOHN FERRARO COUNCIL CHAMBER ROOM 340, CITY HALL 200 NORTH SPRING STREET, LOS ANGELES, CA 90012 Re: 22-0617- Relative to the Downtown Los Angeles Community Plan Update and implementation of the new Zoning Code regulations. Community Plan Carve out for a private property Dear City Council Members: The Board of ADCCLA is writing to express our extreme opposition to the exceptioned carve out from our Community Plan at the LA River between 6th and 7th. The idea that last minute exemptions are being made to prevent height restrictions on the river at one privately owned property is extremely disconcerting. Below are citations from the letter our attorney drafted citing river-adjacent height concerns in our earlier DEIR letter (pp. 3-4) “Arts District community members are particularly troubled by potentially significant aesthetic and cultural resource impacts to currently undesignated historical resources in the Downtown Plan area, especially in and around the Arts District neighborhood. The DEIR describes building heights in the Downtown Plan area as they move from west to east from skyscrapers in the Financial District to one to three story buildings in industrial areas further east along the LA River. (DEIR, p. 4.1-60.) The Arts District is currently predominantly zoned M3 with an FAR of 1.5:1. (DEIR, p. 3-14.) But shade and shadows from new development would be especially impactful in the Arts District area in the Downtown Plan, because “average building heights and associated shadows would increase in the [Hybrid Industrial] area due to the higher permitted FAR” in the Downtown Plan. (DEIR, p. 4.1-69.) Moreover, the DEIR fails to consider shade and shadow impacts on the Los Angeles River, which is adjacent to the Hybrid Industrial part of the Downtown Plan, and an important resource in the community plan area, subject to many years of deliberation and substantial planning efforts. (See, e.g., DEIR, p. 4.10-50, describing the RIO District and Los Angeles River Restoration Master Plan.) The project environmental review should consider shadow impacts on the river.” On the FEIR response to these comments (see esp. FEIR chapter 9, pp. 9-76 to 9-77). The FEIR response section on this underlines that the environmental analysis is based on base stories of 5-15’ along the river with bonus heights of 5-18 stories. The now revised community plan, that has not

undergone CEQA review, apparently has a carve out to benefit one parcel that doubles the base height to allow 30 stories. The environmental review barely provided support for river-adjacent 5-18 story bonus heights, so it could not have possibly analyzed this new last minute version of a proposed project that would essentially double the river adjacent heights." Please note that the environmental review for this space was for a different project in this portion of the community plan and 30 stories was not permissible. If the applicant or future applicants wish to have a substantially larger project on this site, and the community plan's existing FEIR is not adequate to permit this development (since it was never a part of the plan until long after the review process had been completed), Council should adopt the community plan without the over-height carve out, and bring those projects forward using a general plan amendment with appropriately detailed environmental review and a new comment process for community members to participate in due to the unanalyzed impacts associated with doubling the base height in this area. It is our opinion that it would be better to adopt the community plan without a carve out and have it implemented for immediate use rather than have a legal challenge to the EIR's adequacy due to an unanalyzed late amendment benefitting one property owner that holds up the City's ability to immediately implement the plan.

REQUEST Adopt the Downtown Community Plan without the carve out requested by CD 14. It seems there is some confusion as to what parcels should be and were subject to the height limitations. To allow such a carve out creates a slew of unintended consequences that have not been reviewed. We support the balance of the Community plan as submitted by CD 14 and ask only for this one correction. Please understand that we are resolute on this position as it is particularly harmful to our community and the environment. The community vehemently opposed this when the parcel owner impacted by the carve out presented it and we were relentless in our resolve. We ultimately came to an agreement with a much-reduced height limit and our community boards provided a letter of support. It is deeply concerning that this unwanted change is now appearing at the last minute without any environmental review. ALL properties along the river should be zoned in compliance with the river heights already worked out.

Respectfully, Todd Terrazas President ADCCLA Cc: Mayor of Los Angeles,



VIA EMAIL

May 3, 2023

City Council

JOHN FERRARO COUNCIL CHAMBER
ROOM 340, CITY HALL
200 NORTH SPRING STREET, LOS ANGELES, CA 90012

Re: 22-0617- Relative to the Downtown Los Angeles
Community Plan Update and implementation of the new Zoning Code regulations.
Community Plan Carve out for a private property

Dear **City Council Members:**

The Board of ADCCLA is writing to express our extreme opposition to the exceptioned carve out from our Community Plan at the LA River between 6th and 7th. The idea that last minute exemptions are being made to prevent height restrictions on the river at one privately owned property is extremely disconcerting.

Below are citations from the letter our attorney drafted citing river-adjacent height concerns in our earlier DEIR letter (pp. 3-4)

“Arts District community members are particularly troubled by potentially significant aesthetic and cultural resource impacts to currently undesignated historical resources in the Downtown Plan area, especially in and around the Arts District neighborhood.

The DEIR describes building heights in the Downtown Plan area as they move from west to east from skyscrapers in the Financial District to one to three story buildings in industrial areas further east along the LA River. (DEIR, p. 4.1-60.) The Arts District is currently predominantly zoned M3 with an FAR of 1.5:1. (DEIR, p. 3-14.) But shade and shadows from new development would be especially impactful in the Arts District area in the Downtown Plan, because “average building heights and associated shadows would increase in the [Hybrid Industrial] area due to the higher permitted FAR” in the Downtown Plan. (DEIR, p. 4.1-69.)

Moreover, the DEIR fails to consider shade and shadow impacts on the Los Angeles River, which is adjacent to the Hybrid Industrial part of the Downtown Plan, and an important resource in the community plan area, subject to many years of deliberation and substantial planning efforts. (See, e.g., DEIR, p. 4.10-50, describing the RIO District and Los Angeles River Restoration Master Plan.) The project environmental review should consider shadow impacts on the river.”

On the FEIR response to these comments (see esp. FEIR chapter 9, pp. 9-76 to 9-77). The FEIR response section on this underlines that the environmental analysis is based on base stories of 5-15’ along the river with bonus heights of 5-18 stories. The now revised community plan, that has not undergone CEQA review, apparently has a carve out to benefit one parcel that doubles the base height to allow 30 stories. The environmental barely provided support for river-adjacent 5-18 story bonus heights, so it could not have possibly analyzed this new last minute version of a proposed project that would essentially double the river adjacent heights.

Please note that the environmental review for this space was for a different project in this portion of the community plan and 30 stories was not permissible. If the applicant or future applicants wish to have a substantially larger project on this site, and the community plan's existing FEIR is not adequate to permit this development (since it was never a part of the plan until long after the review process had been completed), Council should adopt the community plan **without the over-height carve out**, and bring those projects forward using a general plan amendment with appropriately detailed environmental review and a new comment process for community members to participate in due to the unanalyzed impacts associated with doubling the base height in this area. It is our opinion that it would be better to adopt the community plan without a carve out and have it implemented for immediate use rather than have a legal challenge to the EIR's adequacy due to an unanalyzed late amendment benefitting one property owner that holds up the City's ability to immediately implement the plan.

REQUEST

Adopt the Downtown Community Plan **without the carve out** requested by CD 14. It seems there is some confusion as to what parcels should be and were subject to the height limitations. To allow such a carve out creates a slew of unintended consequences that have not been reviewed. We support the balance of the Community plan as submitted by CD 14 and ask only for this one correction. Please understand that we are resolute on this position as it is particularly harmful to our community and the environment. The community vehemently opposed this when the parcel owner impacted by the carve out presented it and we were relentless in our resolve. We ultimately came to an agreement with a much-reduced height limit and our community boards provided a letter of support. It is deeply concerning that this unwanted change is now appearing at the last minute without any environmental review. ALL properties along the river should be zoned in compliance with the river heights already worked out.

Respectfully,



Todd Terrazas
President

Cc: **Mayor of Los Angeles, Karen Bass**