

Communication from Public

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Date Submitted: 10/11/2024 09:12 AM
Council File No: 22-0617-S5
Comments for Public Posting: Please see attached letter



October 10, 2024

Councilmember John Lee
Chair, Planning & Land Use Management Committee
City of Los Angeles
200 N. Spring Street
Los Angeles, CA 90012

Re: DTLA 2040 Community Plan Reports

Dear Councilmember Lee,

Established in 1924, Central City Association (CCA) represents about 300 businesses, institutions and nonprofits from a broad range of industries who are committed to advancing policies and projects that enhance Downtown Los Angeles' (DTLA) vibrancy and increase opportunity in our region. We have been deeply engaged on the DTLA 2040 Community Plan over the decade-long process to develop and adopt the plan and our advocacy is rooted in objectives to maximize transit-oriented housing that is affordable across income levels, create a flexible framework that can adapt over time to support Downtown's economy, and increase transparency in the development approval process. We also believe the City must ensure the plan can yield financially feasible development, otherwise the plan's vision cannot be implemented and the various public benefits will not be realized. With those objectives and considerations in mind, we are writing in response to the reports that were submitted to City Council on specific issues following Council's approval of the plan in May 2023.

Recommendation #1: Adopt the technical language provided in sections A and B (pgs 10-12) of [City Planning's report under CF-22-0617-S3](#). This would allow parcels with frontage on Skid Row's primary corridors (5th, 6th, 7th, and Central) to make use of Set A of the downtown-wide inclusionary requirements (typically between 8%-16% of units depending on income-levels). This approach would bring the zoning for Skid Row into greater consistency with the rest of the DTLA Community Plan. This would help connect the area with the surrounding neighborhoods rather than cordoning it off, and better suit the area for the potential for mixed-income growth can help create a healthy, thriving community and support the kinds of neighborhood-serving uses the community has expressed desire for. It would also be a marked and explicit shift away from the longstanding failed policy of containment on Skid Row, which we believe would be an important step for the City to express its vision for solving the homelessness crisis.

Recommendation #2: Adopt financially feasible standards for the Fashion District's IX3 Zone with a lower productive space requirement and no requirements for freight elevators and loading bays as discussed in [City Planning's report under CF-22-0617-S5](#). As we articulated at length in [our April 28, 2023 letter to City Council](#) and is reiterated in City Planning's report, the proposed Fashion District zoning requirements are not financially feasible for new development. These requirements jeopardize the plan's projected 12,000 new housing units, of which 1,000 to 2,000 would be rent-restricted affordable, for this area of DTLA, along with any new other community benefits that might be provided by these developments such as badly needed parks and community facilities. This would be a major missed opportunity and would freeze this area in its currently economically challenged state.

Recommendation #3: Exempt Non-Ductile Concrete Buildings from Limitations on Conversion. Although not discussed in [City Planning's report under CF-22-0617-S5](#), we want to restate the importance of a related recommendation we made



in [our March 27, 2023 letter to the Planning & Land Use Management Committee](#) to allow for non-ductile concrete buildings in the Fashion District to convert for earthquake safety purposes. Non-ductile concrete buildings are currently under order by the City to be seismically retrofitted, however, there is no funding source for retrofits and the upgrades are costly. Enabling the adaptive reuse of these buildings can be a viable pathway toward private investment in seismic retrofits that enhance public safety. While the concern about conversion of buildings in the Fashion District is about potential displacement of garment manufacturing work, the City could allow conversions after a lookback period. For instance, if no garment work has taken place in a building for 2 years, those buildings could then be allowed to convert to new uses.

With these recommendations, we are eager to see the full adoption and enactment of the DTLA 2040 Community Plan. We are grateful for the work of the City Planning Department and City Council. Thank you for considering our comments.

Sincerely,

Nella McOsker
President & CEO
Central City Association

CC: Honorable Members of the Planning & Land Use Management Committee