

Communication from Public

Name: Kestrel Jenkins

Date Submitted: 03/15/2023 11:13 AM

Council File No: 22-0617

Comments for Public Posting: Conscious Chatter supports the Garment Worker Center amendments for the DTLA 2040 Community Plan to preserve, protect and incentivize this essential industry. The garment industry in Los Angeles is the second largest manufacturing industry in Los Angeles and largest apparel producing hub in the United States, with a history in Downtown LA going back over 130 years.

Conscious Chatter[®]

March 8th, 2023

Los Angeles City Hall
200 N. Spring Street, Room 450
Los Angeles, CA
90012

Re: LA's Garment Industry and the Downtown Los Angeles 2040 Community Plan

Dear Councilmembers,

Conscious Chatter supports the Garment Worker Center amendments for the DTLA 2040 Community Plan to preserve, protect and incentivize this essential industry. The garment industry in Los Angeles is *the second largest manufacturing industry in Los Angeles and largest apparel producing hub in the United States, with a history in Downtown LA going back over 130 years.*

The **DTLA 2040 Community Plan** and the zoning and land use changes it proposes will impact thousands of garment industry businesses and their employees within the DTLA Fashion District, as well as the countless neighboring businesses & sectors that support and work with these businesses on a regular basis. Within the Fashion District, the DTLA 2040 Plan proposes a drastic shift in land use from largely manufacturing zones, to primarily 'Markets' and 'Hybrid Industrial' designations, both of which allow for a significant restructuring of the Fashion District's urban form. The consequences of these strategies on the garment sector, an estimated 20,000 jobs, thousands of small businesses, and the Fashion District's immigrant, low wage workers of color cannot be understated. The infiltration of market rate housing through the DTLA 2040 Plan is of particular concern, as it will significantly raise land values within the area. By applying Market and Hybrid Industrial zoning designations over much of the Fashion District, the DTLA 2040 Plan incentivizes commercial landlords to displace garment manufacturing businesses to create unaffordable, market-rate housing.

The Fashion District should be understood and celebrated as a lively and growing ecosystem that provides the critical infrastructure needed to protect public health and ensure the industry's growth in sustainable production. This requires proximity to the largest concentration of skilled garment workers in the United States, who have on average over 21 years of experience, and affordable manufacturing and industrial spaces for fabric and garment manufacturing, assembly, finishing, warehousing, and distribution processes. LA leads domestically - accounting for 82.5% of California's and 83% of the nation's cut & sew apparel sales¹. LA's fashion industry produces an estimated \$15 billion worth of products each year, according to the California Fashion Association². The displacement of the businesses that make up this ecosystem and the jobs they provide will have a devastating impact on the future of the domestic apparel industry and

¹ BizMiner, "Industry Market Report: NAICS [3152]," 2021.

² Clark, Gino. "California Style: Financing the West Coast's Apparel Industry" Sep 1 2022

<<https://www.mannpublications.com/fashionmannuscript/2022/09/01/california-style-financing-the-west-coasts-apparel-industry/>>

would be a huge set back to these recent gains for the industry at large. **We support the solutions proposed by the Garment Worker Center to remedy these problems within the DTLA 2040 plan and to ensure the long-term viability of LA's unique and essential garment sector, outlined below and detailed in a separate letter previously submitted to the Council File by the GWC in February of 2023.**

Preservation

We demand the preservation of the Fashion District neighborhood as a localized urban manufacturing employment hub & ecosystem, by ensuring garment manufacturing uses remain permitted throughout the district, with no loss of the jobs or businesses that make up the largest apparel producing industry in the United States. It is critical to maintain accessibility to these jobs for the workers who rely on public transportation in their commutes. Vital to ensuring these jobs persist is a built environment which allows for ease in the movement of goods and materials within and between these businesses, and dedicated, affordable manufacturing and industrial spaces for garment manufacturing, assembly, finishing, warehousing, and distribution processes.

- 1) To help curb displacement of garment jobs, create and enforce a retroactive “lookback” going back 5 years to identify if manufacturing uses have occupied a portion of any building or lot before permitting a change of use.
- 2) Identify and allocate resources to an appropriate entity to assess small business displacement risk as a result of redevelopment and support any displaced small businesses in the Fashion District when displacement cannot be prevented.
- 3) Require the preservation of freight elevators, loading docks, and loading bays within and directly surrounding buildings currently occupied by garment manufacturing businesses.
- 4) Require 1.5 FAR of manufacturing space for all new, residential and non-residential developments in mixed use areas of the Fashion District.
- 5) Identify and allocate resources to an appropriate entity to enforce FAR requirements before leasing is approved.

Protection

We demand the protection of DTLA's garment manufacturing jobs and this local ecosystem from displacement due to real estate speculation and climbing rents as a result of the introduction of new & competitive uses within the Fashion District. We seek the prioritization of the development of affordable housing at “Very Low”, “Extremely low”, and “Acutely Low” income levels within the Fashion District through strong community benefits agreements and within Adaptive Reuse and Live/Work programs.

- 6) In the Western proposed IX2 use designation within the Fashion District, change use designation from IX2 to IX3.
- 7) Expand Planning's proposed Community Plan Implementation Overlay (CPIO) A.5 Employment Incentive Subarea in the Fashion District throughout the entire IX3 use designation, as well as IX2, IX4, and CX3 use designations within the Fashion District to promote and incentivize developers to create new light manufacturing space.

- 8) Prohibit hotels in IX2, IX3, IX4, CX3, I1, & I2 use designations within the boundaries of the Fashion District.
- 9) Affordability requirements must remain in the Downtown Adaptive Reuse provisions.
- 10) Strengthen requirements for conversion of manufacturing space into Joint Living & Work Quarters, and limit “work” uses to ensure a focus on garment manufacturing.
- 11) In IX2, IX3, + IX4 use designation areas within the Fashion District, prohibit entertainment, recreation, and stadium uses from being developed or converted from industrial uses:
- 12) Prohibit the off-site construction of affordable housing units for developments in Fashion District.

Incentivize

We demand that city leaders collaborate across departments and offices to create opportunities to provide various financing tools that attract and incentivize mission-driven urban manufacturing developers in order to help preserve existing and create new manufacturing jobs downtown that employ local Angelenos, and revitalize this sector and neighborhood.

- 13) Facilitate and support partnerships between the City’s Workforce Development Board, Economic & Workforce Development Department, and proven industry-specific organizations and labor groups like Garment Worker Center to develop, pilot, and fund Los Angeles fashion manufacturing programming aimed at preserving employment opportunities, increasing economic impact and job creation, as well as uplifting and growing ethical and sustainable garment manufacturing jobs for garment workers in Los Angeles.
- 14) Facilitate links with established retail banks, community development financial institutions, and credit unions, and federal and local funding opportunities which create access to capital to drive recovery for the garment industry.

At this time, we ask that the voices of the workforce and the very businesses that actually define and characterize the area triumph. This land use proposal is an important opportunity to redirect the systemic inequities garment workers face and engage this historically underrepresented population in the planning process. We urge you to do right by the community of garment workers and small businesses who were essential in protecting us from the onset of the pandemic.

Sincerely,

Kestrel Jenkins McGill
Host
Conscious Chatter

Communication from Public

Name: Anabel Martinez
Date Submitted: 03/15/2023 01:43 PM
Council File No: 22-0617
Comments for Public Posting: See attached letter of Support.



Loyola Law School

Loyola Marymount University

Sunita Jain Anti-Trafficking Initiative

March 15th, 2023

Los Angeles City Hall

200 N. Spring Street, Room 450

Los Angeles, CA

90012

Re: LA's Garment Industry and the Downtown Los Angeles 2040 Community Plan

Dear Councilmembers,

Loyola Law School, The Sunita Jain Anti-Trafficking Policy Initiative supports the Garment Worker Center amendments for the DTLA 2040 Community Plan to preserve, protect and incentivize this essential industry. The garment industry in Los Angeles is ***the second largest manufacturing industry in Los Angeles and largest apparel producing hub in the United States, with a history in Downtown LA going back over 130 years.***

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Sincerely,

Anabel Martinez
Policy Associate
The Sunita Jain Anti-Trafficking Policy Initiative

Communication from Public

Name: Latino Coalition Los Angeles

Date Submitted: 03/15/2023 04:29 PM

Council File No: 22-0617

Comments for Public Posting: Dear Councilmembers, Latino Coalition of Los Angeles supports the Garment Worker Center amendments for the DTLA 2040 Community Plan to preserve, protect and incentivize this essential industry. The garment industry in Los Angeles is the second-largest manufacturing industry in Los Angeles and the largest apparel-producing hub in the United States, with a history in Downtown LA going back over 130 years. The DTLA 2040 Community Plan and the zoning and land use changes it proposes will impact thousands of garment industry businesses and their employees within the DTLA Fashion District, as well as the countless neighboring businesses & sectors that support and work with these businesses on a regular basis. Within the Fashion District, the DTLA 2040 Plan proposes a drastic shift in land use from largely manufacturing zones, to primarily 'Markets' and 'Hybrid Industrial' designations, both of which allow for a significant restructuring of the Fashion District's urban form. The consequences of these strategies on the garment sector, an estimated 20,000 jobs, thousands of small businesses, and the Fashion District's immigrant, low wage workers of color cannot be understated. The infiltration of market rate housing through the DTLA 2040 Plan is of particular concern, as it will significantly raise land values within the area. By applying Market and Hybrid Industrial zoning designations over much of the Fashion District, the DTLA 2040 Plan incentivizes commercial landlords to displace garment manufacturing businesses to create unaffordable, market-rate housing. The Fashion District should be understood and celebrated as a lively and growing ecosystem that provides the critical infrastructure needed to protect public health and ensure the industry's growth in sustainable production. This requires proximity to the largest concentration of skilled garment workers in the United States, who have on average over 21 years of experience, and affordable manufacturing and industrial spaces for fabric and garment manufacturing, assembly, finishing, warehousing, and distribution processes. LA leads domestically - accounting for 82.5% of California's and 83% of the nation's cut & sew apparel sales



March 15th, 2023

Los Angeles City Hall
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Sincerely,

Latino Coalition of Los Angeles

Communication from Public

Name: Latino Coalition Los Angeles

Date Submitted: 03/15/2023 04:30 PM

Council File No: 22-0617

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Communication from Public

Name: Victor Narro

Date Submitted: 03/15/2023 07:55 PM

Council File No: 22-0617

Comments for Public Posting: Dear Honorable City Councilmembers, On behalf of the UCLA Labor Center for Labor Research and Education (UCLA Labor Center), I write as a labor research academic expert on the garment industry in strong support of the Garment Worker Center's amendments for the DTLA 2040 Community Plan to preserve, protect and incentivize this essential industry. As the largest industry of its kind in the United States, the apparel manufacturing industry in Los Angeles County produces \$4.7 billion in total annual output and employs 46,200 workers. This is the engine that keeps the fashion industry moving. While increasing costs of labor encourage more and more retailers to source from low-cost countries abroad, the City of Los Angeles remains one of the strongholds for domestic apparel manufacturing. This is because of a strong clustering of garment manufacturers who have been in Los Angeles since as early as 1911 and more recently in the late 1970s and early 1980s. Over the years, "fast fashion" has taken Los Angeles' fashion industry by storm and the demands of quick turnaround and variability of styles present many opportunities and challenges today. In fact, the garment industry in Los Angeles is the second largest manufacturing industry in the city and largest apparel producing hub in the United States. The DTLA 2040 Community Plan and the zoning and land use changes it proposes will impact thousands of garment industry businesses and their employees within the DTLA Fashion District, as well as the countless neighboring businesses and sectors that support and work with these businesses on a regular basis. Within the Fashion District, the DTLA 2040 Plan proposes a drastic shift in land use from largely manufacturing zones, to primarily 'Markets' and 'Hybrid Industrial' designations, both of which allow for a significant restructuring of the Fashion District's urban form. The consequences of these strategies on the garment sector, an estimated 20,000 jobs, thousands of small businesses, and the Fashion District's low-wage immigrant cannot be understated. The infiltration of market rate housing through the DTLA 2040 Plan is of particular concern, as it will significantly raise land values within the area. By applying Market and Hybrid Industrial zoning designations over much of the Fashion District, the DTLA 2040 Plan incentivizes commercial landlords to displace garment

manufacturing businesses to create unaffordable, market-rate housing. The Fashion District should be understood and celebrated as a lively and growing ecosystem that provides the critical infrastructure needed to protect public health and ensure the industry's growth in sustainable production. This requires proximity to the largest concentration of skilled garment workers in the United States, who have on average over 21 years of experience, and affordable manufacturing and industrial spaces for fabric and garment manufacturing, assembly, finishing, warehousing, and distribution processes. LA leads domestically - accounting for 82.5% of California's and 83% of the nation's cut & sew apparel sales. LA's fashion industry produces an estimated \$15 billion worth of products each year, according to the California Fashion Association. The displacement of the businesses that make up this ecosystem and the jobs they provide will have a devastating impact on the future of the domestic apparel industry and would be a huge set back to these recent gains for the industry at large. We support the solutions proposed by the Garment Worker Center to remedy these problems within the DTLA 2040 plan and to ensure the long-term viability of LA's unique and essential garment sector detailed in a separate letter previously submitted to the Council File by GWC last month (February 2023). Thank you very much for your time and attention. Sincerely, Victor Narro Project Director, UCLA Labor Center Professor, UCLA Department of Labor Studies



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March 15, 2023

Los Angeles City Hall
200 N. Spring Street, Room 450
Los Angeles, CA 90012

Re: LA's Garment Industry and the Downtown Los Angeles 2040 Community Plan

Dear Honorable City Councilmembers,

On behalf of the UCLA Labor Center for Labor Research and Education (UCLA Labor Center), I write as a labor research academic expert on the garment industry in strong support of the Garment Worker Center's amendments for the DTLA 2040 Community Plan to preserve, protect and incentivize this essential industry. As the largest industry of its kind in the United States, the apparel manufacturing industry in Los Angeles County produces \$4.7 billion in total annual output and employs 46,200 workers. This is the engine that keeps the fashion industry moving. While increasing costs of labor encourage more and more retailers to source from low-cost countries abroad, the City of Los Angeles remains one of the strongholds for domestic apparel manufacturing. This is because of a strong clustering of garment manufacturers who have been in Los Angeles since as early as 1911 and more recently in the late 1970s and early 1980s. Over the years, "fast fashion" has taken Los Angeles' fashion industry by storm and the demands of quick turnaround and variability of styles present many opportunities and challenges today. In fact, the garment industry in Los Angeles is the second largest manufacturing industry in the city and largest apparel producing hub in the United States.

The DTLA 2040 Community Plan and the zoning and land use changes it proposes will impact thousands of garment industry businesses and their employees within the DTLA Fashion District, as well as the countless neighboring businesses and sectors that support and work with these businesses on a regular basis. Within the Fashion District, the DTLA 2040 Plan proposes a drastic shift in land use from largely manufacturing zones, to primarily 'Markets' and 'Hybrid Industrial' designations, both of which allow for a significant restructuring of the Fashion District's urban form. The consequences of these strategies on the garment sector, an estimated 20,000 jobs, thousands of small businesses, and the Fashion District's low-wage immigrant cannot be understated. The infiltration of market rate housing through the DTLA 2040 Plan is of particular concern, as it will significantly raise land values within the area. By applying Market and Hybrid Industrial zoning designations over much of the Fashion District, the DTLA 2040



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Plan incentivizes commercial landlords to displace garment manufacturing businesses to create unaffordable, market-rate housing.

The Fashion District should be understood and celebrated as a lively and growing ecosystem that provides the critical infrastructure needed to protect public health and ensure the industry's growth in sustainable production. This requires proximity to the largest concentration of skilled garment workers in the United States, who have on average over 21 years of experience, and affordable manufacturing and industrial spaces for fabric and garment manufacturing, assembly, finishing, warehousing, and distribution processes. LA leads domestically - accounting for 82.5% of California's and 83% of the nation's cut & sew apparel sales. LA's fashion industry produces an estimated \$15 billion worth of products each year, according to the California Fashion Association. The displacement of the businesses that make up this ecosystem and the jobs they provide will have a devastating impact on the future of the domestic apparel industry and would be a huge set back to these recent gains for the industry at large.

We support the solutions proposed by the Garment Worker Center to remedy these problems within the DTLA 2040 plan and to ensure the long-term viability of LA's unique and essential garment sector, outlined below and detailed in a separate letter previously submitted to the Council File by GWC last month (February 2023):

Preservation

We demand the preservation of the Fashion District neighborhood as a localized urban manufacturing employment hub & ecosystem, by ensuring garment manufacturing uses remain permitted throughout the district, with no loss of the jobs or businesses that make up the largest apparel producing industry in the United States. It is critical to maintain accessibility to these jobs for the workers who rely on public transportation in their commutes. Vital to ensuring these jobs persist is a built environment which allows for ease in the movement of goods and materials within and between these businesses, and dedicated, affordable manufacturing and industrial spaces for garment manufacturing, assembly, finishing, warehousing, and distribution processes.

Protection

We demand the protection of DTLA's garment manufacturing jobs and this local ecosystem from displacement due to real estate speculation and climbing rents as a result of the introduction of new and competitive uses within the Fashion District. We seek the prioritization of the development of affordable housing at "Very Low", "Extremely low", and "Acutely Low" income



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levels within the Fashion District through strong community benefits agreements and within Adaptive Reuse and Live/Work programs.

Incentivize

We demand that city leaders collaborate across departments and offices to create opportunities to provide various financing tools that attract and incentivize mission-driven urban manufacturing developers in order to help preserve existing and create new manufacturing jobs downtown that employ local Angelenos, and revitalize this sector and neighborhood.

It is my hope that you will find the information in this letter useful as you discuss and consider the final stages of approving the DTLA 2040 Community Plan.

Thank you very much for your time and attention.

Sincerely,

Victor Narro
Project Director, UCLA Labor Center
Professor, UCLA Department of Labor Studies

Communication from Public

Name: Estela Lopez

Date Submitted: 03/15/2023 10:55 PM

Council File No: 22-0617

Comments for Public Posting: March 15, 2023 Los Angeles City Council Planning and Land Use Committee RE: CF 22-0617 DTLA2040 and its impact on Skid Row Dear Councilmembers, In advance of your consideration of the DTLA 2040 Community Plan Update, the Central City East Association (CCEA) would like to submit these additional comments for your review and consideration. CCEA administers the Downtown Industrial Business Improvement District (BID) and represents more than 600 properties in the skid row area of Downtown Los Angeles. We cannot support any recommendation that creates a neighborhood of intentional, permanent poverty and that ignores all tenets of good planning and the City's own principles. With IX1, the City of Los Angeles will intentionally – and by policy – create a neighborhood segregated by income. As the Los Angeles Times in its February 5 editorial stated, “...having any neighborhood officially designated for low-income people is akin to at least economic if not racial segregation.” IX1 is proposed on 28 blocks that are currently zoned industrial. It would allow future residential uses to be built on these parcels but require that they be 100%-affordable. This income-determined approach is unique to Central City East and is not considered for nor applied to any other neighborhood in the city. It demonstrates an egregious disregard of lessons from past plans that created designed clusters of poverty and consequently denied their residents opportunities for better life outcomes in health, education, and family prosperity. Adopting IX1 will mean that we have learned nothing from history. The original sin of planning has been its implicit and explicit attempts at using income to determine who can live where. Planning reform in recent years has focused on undoing this legacy. But DTLA 2040 deals a blow to these efforts by broadcasting that it is again acceptable to create and segregate neighborhoods by income. Because of this, IX1 is inconsistent with Federal and State guidelines for Affirmatively Furthering Fair Housing (AFFH). By mandating new income-restricted housing in an area of already concentrated poverty, it fundamentally flouts AFFH principles that aim to "replace segregated living patterns with truly integrated and balanced living patterns." IX1 also ignores the State's efforts at shifting new housing construction, especially affordable housing, into areas of high opportunity and resources. Central City East's

census tract is designated as “High Segregation and Poverty,” the lowest resource category identified by the State’s Housing and Community Development Department (HCD). It is objectively the least appropriate location to concentrate additional poverty-stricken residents. IX1 will certainly also fail in achieving its functional goal – to facilitate the production of affordable housing. Given the requirement that all future homes here be deed- and income-restricted, affordable-housing developers will have to rely on public subsidies. But inconsistency with Federal and State AFFH guidelines means that such proposed projects will score poorly, public funds will be unavailable, and no new housing will get developed. We urge you to rethink IX1. It is a disheartening repackaging of failed planning policies that will ensure skid row remains neglected, underserved, underinvested, neatly contained, and deliberately isolated. We thank you for your consideration.

Los Angeles Times

OPINION

Editorial: Let skid row have affordable and market-rate housing. It's the forward-looking thing to do



The historic Catalina building, seen in July 2019, has been repurposed for restaurants, distribution, retail, industrial and creative office space at 443 S. San Pedro St. in Los Angeles.
(Gary Coronado / Los Angeles Times)

BY THE TIMES EDITORIAL BOARD

FEB. 5, 2023 5 AM PT

For more than a century, skid row has been a community of last resort. In the early 20th century, it was the area, on the east side of downtown, where the railroad ended, depositing immigrants and men seeking better work. With little money in hand they stayed in hotels, flophouses and religious missions. Some never found the success they sought and simply stayed on skid row, sometimes falling into the grasp of addictions.

Over time, skid row became the part of the city that tolerated those unwanted elsewhere — the addicted, the poor, Black people. The housing stock, mostly of single-room occupancy hotels, was cheap, but about half of it was demolished from the mid-1960s to the mid-1970s when owners decided they would rather tear their buildings down than make city-ordered repairs. In the 1970s the city adopted an official policy of “containment” — concentrating cheap hotels, shelters and service agencies on skid row to both take care of residents and prevent them from setting up in other parts of downtown or the city. It was born of a desire by leaders to help and also to wipe their hands of the misery there.

In the last few decades, as homelessness has hit crisis levels, L.A. leaders have sought to build homeless housing throughout the city and take some pressure off skid row, where sidewalks are covered in tents and people cram their belongings into bags and shopping carts. An appalling lack of public toilets forces people to use streets as bathrooms. A federal judge ordered the city to essentially shelter the entirety of skid row. His order was eventually overturned. But skid row remains the community in Los Angeles with the highest concentration of homeless people — 4,402 by the 2022 homeless count. The people who live on skid row — both housed and unhoused — have grown to see themselves as a community, even trying (unsuccessfully) to establish a neighborhood council in an effort to make elected officials see them as residents, not a collection of the downtrodden.

Now, skid row stands at a turning point. The new Downtown Community Plan — also known as DTLA 2040 because it would set the rules for development for the next 20

years — would designate a portion of historic skid row, between 5th and 7th streets and San Pedro Street and Central Avenue, as an area where only affordable housing could be built. The area, which will get a new zoning designation, IX1, meaning mixed industrial use, is a sliver of skid row. Still, it's significant because it would be the first area of the city with new housing reserved for residents defined as acutely low income (homeless or almost) to moderately low income.

Some skid row residents and advocates for homeless people say this affordable-housing-only district will ensure poor people aren't displaced by the market-rate development that will otherwise transform the community. Critics, including some service providers, however, warn that the city will be creating Containment 2.0, continuing the economic and social segregation that has fueled the miserable conditions on skid row.

The concerns are justified on both sides. Market-rate projects are already underway at the edges of skid row, and there have been building booms nearby in the Arts District and historic core that pushed out low-income tenants. Yet having any neighborhood officially designated for low-income people is akin to at least economic if not racial segregation. (About 30% of the county's homeless population is Black and 45% is Latino.) A healthy community has a mix of housing — market rate and affordable — and a mix of residents and, according to some, the amenities that generally follow an influx of people with various income levels: supermarkets, hair salons, pharmacies. Those are amenities that skid row has been missing.

But simply declaring there should be a mix of housing won't make it a reality. How do you allow entry to market-rate developers without displacing thousands of poor people in that community who are either unstably housed or not housed at all?

We believe there is a way to mix both.

The downtown plan already requires housing built anywhere downtown (outside the special IX1 zone) to have a baseline percentage of affordable housing. If a project wants more benefits — like building more densely — the project must offer more affordable housing.

In the skid row zone, city planners could require that market-rate developers provide a greater percentage of affordable units than what is required in the rest of downtown. Or the city could set a cap on the number of market-rate units that could be built in the

zone. Developers of 100% affordable housing should still be able to build without restrictions.

The goal in this particularly impoverished community is to make room for more housing and more investment to lift up the neighborhood. Making skid row more of a mixed-income community need not displace current residents or services, if done carefully. Pushing residents out and forcing them to look for another place to live would be a failure. There's room to create a sound community plan that doesn't allow that to happen.

Communication from Public

Name: Estela Lopez
Date Submitted: 03/15/2023 11:06 PM
Council File No: 22-0617
Comments for Public Posting: Please see our letter attached.



March 15, 2023

Los Angeles City Council
Planning and Land Use Committee

RE: CF 22-0617 DTLA2040 and its impact on Skid Row

Dear Councilmembers,

In advance of your consideration of the DTLA 2040 Community Plan Update, the Central City East Association (CCEA) would like to provide these comments for your review and consideration. CCEA administers the Los Angeles Downtown Industrial Business Improvement District (BID) representing 600 properties in the skid row area of Downtown Los Angeles.

We cannot support any recommendation that creates a neighborhood of intentional, permanent poverty and that ignores all tenets of good planning and the City's own principles. With IX1, the City of Los Angeles will intentionally – and by policy – create a neighborhood segregated by income. As the Los Angeles Times in its February 5 editorial stated, *"...having any neighborhood officially designated for low-income people is akin to at least economic if not racial segregation."*

IX1 is proposed on 28 blocks that are currently zoned industrial. It would allow future residential uses to be built on these parcels but require that they be 100%-affordable. This income-determined approach is unique to Central City East and is not considered for nor applied to any other neighborhood in the city. It demonstrates an egregious disregard of lessons from past plans that created designed clusters of poverty and consequently denied their residents opportunities for better life outcomes in health, education, and family prosperity.

Adopting IX1 will mean that we have learned nothing from history. The original sin of planning has been its implicit and explicit attempts at using income to determine who can live where. Planning reform in recent years has focused on undoing this legacy. But DTLA 2040 deals a blow to these efforts by broadcasting that it is again acceptable to create and segregate neighborhoods by income.

Because of this, IX1 is inconsistent with Federal and State guidelines for Affirmatively Furthering Fair Housing (AFFH). By mandating new income-restricted housing in an area of already concentrated poverty, it fundamentally flouts AFFH principles that aim to "replace segregated living patterns with truly integrated and balanced living patterns."

IX1 also ignores the State's efforts at shifting new housing construction, especially affordable housing, into areas of high opportunity and resources. Central City East's census tract is designated as "High Segregation and Poverty," the lowest resource category identified by the State's Housing and Community Development Department (HCD). It is objectively the least appropriate location to concentrate additional poverty-stricken residents.

IX1 will certainly also fail in achieving its functional goal – to facilitate the production of affordable housing. Given the requirement that all future homes here be deed- and income-restricted, affordable-housing developers will have to rely on public subsidies. But inconsistency with Federal and State AFFH guidelines means that such proposed projects will score poorly, public funds will be unavailable, and no new housing will get developed.

We urge you to rethink IX1. It is a disheartening repackaging of failed planning policies that will ensure skid row remains neglected, underserved, underinvested, neatly contained, and deliberately isolated.

We thank you for your consideration.

Sincerely,

A handwritten signature in cursive script that reads "Estela Lopez".

Estela Lopez, Executive Director
Central City East Association & Downtown Industrial BID