

## Communication from Public

**Name:** Estela Lopez  
**Date Submitted:** 04/18/2023 05:05 PM  
**Council File No:** 22-0617  
**Comments for Public Posting:** Comments from Central City East Association/Downtown Industrial District BID property owners to members of the Planning and Land Use Committee.



April 18, 2023

Los Angeles City Council  
Planning and Land Use Committee

**RE: CF 22-0617 DTLA2040, IX1 Zone and recommended alternative**

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 **additional 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.

DTLA 2040 includes the IX1 Zone 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 applied to any other neighborhood in Los Angeles.

**We believe there are major unanswered legal questions about the IX1 zone that the City does not appear to have considered to date.** Housing is the most significantly constrained aspect of the City's land use authority, and the City is subject to a wide range of state laws limiting its ability to regulate the approval of housing. For example, Government Code Section 65850(g) requires the City to provide alternative means for complying with the 100% inclusionary requirement applicable in the IX1 zone. What alternative means does the City intend to provide? The City also needs to explain how the 100% inclusionary requirement in the zone will interact with state laws that require the City to approve housing developments at lower inclusionary thresholds, such as the Density Bonus Law and SB 35. As the Legislature continues to pass new state housing laws, the state law questions around this unprecedented 100% inclusionary requirement will only grow. The City must consider and address these questions now, before this plan becomes law, because it will have precious little time to do so within

state-mandated deadlines once it starts receiving development applications that are subject to the plan.

We also believe that **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."

**The Board of Directors of the Central City East Association and the Downtown Industrial District BID urge you to replace IX1 and in its place extend the CX2 designation that is currently proposed for the northern third of skid row (between 3<sup>rd</sup> and 5<sup>th</sup> Streets, from San Pedro to Central) and create a specific Community Benefits Overlay for all of skid row.**

- The CX2 Use District allows for commercial uses generally within a 50,000 square foot establishment size on the ground story, as well as a wide range of housing types. the Use District is intended to support a broad range of residential, commercial, and civic facility uses to serve surrounding neighborhoods as well as visitors to the area. Public and institutional services and amenities are also allowed. (Page 5-54 in [https://planning.lacity.org/odocument/e20b5f7a-cc23-44ad-acd8-6012f4cbc190/recodeLA\\_Art05-Use\\_DT\\_CPC\\_Recommendation\\_Draft\\_Sept2022.pdf](https://planning.lacity.org/odocument/e20b5f7a-cc23-44ad-acd8-6012f4cbc190/recodeLA_Art05-Use_DT_CPC_Recommendation_Draft_Sept2022.pdf))
- DTLA2040 already proposes CX2 for the northern blocks of Skid Row (between 3rd and 5th and San Pedro to Central). These blocks are currently zoned M2 Industrial (as are the blocks that IX1 is proposed on). There is, therefore, currently no land use policy distinction between the blocks upon which CX2 is proposed and the blocks upon which IX1 is proposed. Further, CX2 does not mandate 100% inclusionary housing.
- To create a complete, well-served community we recommend the establishment of a community benefits overlay for all of Skid Row (Third to Seventh Sts.) that would go beyond the requirements of the downtown-wide Community Benefits Program. Skid Row's needs are unique and different compared to the rest of downtown. This overlay would incentivize the provision of local-serving walkable services/amenities that the housed, unhoused and workforce communities have historically lacked:
  - Grocery store
  - Convenience stores
  - Pharmacy
  - Clothing and shoe stores
  - Hardware Store
  - Pet stores/supplies
  - Banks
  - Hair Salon
  - Coffee shop / Restaurants

We thank you for your consideration.

Sincerely,

A handwritten signature in black ink that reads "Estela Lopez". The script is fluid and cursive, with the first letters of each word being capitalized and prominent.

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

## Communication from Public

**Name:** Lorraine

**Date Submitted:** 04/18/2023 01:37 PM

**Council File No:** 22-0617

**Comments for Public Posting:** At the mini years of homelessness in downtown community I survived it because people cared and that's what people are doing today allowing people to have life again and everyone should have affordable housing because it's overwhelming that's why so many people are on the streets they can't afford the rent skid row is a beautiful place and we wanna make it beautiful for everyone so I'm showing my support because I'm a homeless woman that made it on the streets of Los Angeles I had nothing and I wanted to get back home to my children and my mom and people like this helping people no I'm a advocate for homelessness and I love what I do because people have the right to have a positive outlook on living and we need help please don't take away the opportunity move the downtown 2040 plan forward. I guarantee you you'll be happy you did do you know sometimes it's just get to the point where you can do the right thing and this is the right thing

## Communication from Public

**Name:**

**Date Submitted:** 04/18/2023 01:42 PM

**Council File No:** 22-0617

**Comments for Public Posting:** Save Skid Row for the people of this neighborhood. We need parks and community centers, not more liquor stores and smokehouse. Help Los Angeles's most vulnerable citizens. Thank you

## Communication from Public

**Name:** Esperanza Community Housing

**Date Submitted:** 04/18/2023 10:18 AM

**Council File No:** 22-0617

**Comments for Public Posting:** Attached, please find Esperanza Community Housing's letter in support of of the Central City United (CCU) Coalition's comments and policy recommendations that would ensure that the Downtown LA Community Plan will promote equity and justice throughout downtown. As a founding member of the UNIDAD Coalition, we value the work of our CCU partners as it reflects the values and processes that went into drafting the People's Plan for the South/Southeast LA Community Plans. So, we urge you to please support CCU's comments and policies to ensure that equity and justice is centered in the Downtown LA Community Plan. Thank you.



April 17, 2023

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

***Delivered via electronic mail.***

RE: [CF 22-0617] – Downtown LA Community Plan Update 2040

Dear Councilmembers,

Esperanza Community Housing submits this letter in support of the Central City United (CCU) Coalition's comments and policy recommendations that would ensure that the Downtown LA Community Plan will promote equity and justice throughout downtown. As a founding member of the UNIDAD Coalition, we value the work of our CCU partners as it reflects the values and processes that went into drafting the People's Plan for the South/Southeast LA Community Plans. We also share CCU's appreciation for the Planning Department and the City Planning Commission for their role in drafting and advancing a plan that incorporates many of the community-centered policy recommendations put forth by CCU.

CCU is multi-neighborhood coalition led by Little Tokyo Service Center (LTSC), the Los Angeles Community Action Network (LA CAN), and the Southeast Asian Community Alliance (SEACA), as key organizations embedded in Little Tokyo, Skid Row, and Chinatown, along with Public Counsel. CCU formed to lift up the voices and concerns of Downtown's poorest and most vulnerable residents and stakeholders in the community plan update process.

As the City continues to grapple with institutional racism and structural injustice, we applaud the Department of City Planning for acknowledging the deep harms that past land use and planning policies have inflicted on low-income communities and communities of color. Now, as the City commits to repairing these harms, the Community Plans are a tool to do just that. As the framework for growth, development and investment in Downtown for years to come, this Plan must center the needs and priorities of those communities that have been most harmed. To advance an even more inclusive and equitable Downtown Community Plan, we ask the City to adopt the following changes recommended by CCU, and to approve and pass the Plan by May 12. Any delay not only creates uncertainty, but puts us in violation of state housing law, preventing us from addressing the housing crisis that plagues our city.

1. **Adopt the graduated affordable housing program recommended by the Department of City Planning.**
2. **Ensure that new affordable housing created by the Plan is actually located in the Downtown LA Community Plan Area.**
3. **Require mixed-income projects to utilize Schedule 6 rents for affordable units.**
4. **Include a new Program creating a Displacement Impact Analysis.**

**Building hope with community**

3655 S. Grand Avenue, Los Angeles, CA 90007 \* tel 213-748-7285 \* fax 213-748-9630 \* [esperanzacommunityhousing.org](http://esperanzacommunityhousing.org)





5. **Require replacement of Acutely Low, Extremely Low and Very Low-Income units at the same or lower affordability level and apply this requirement across all projects.**
6. **Include on-site affordable housing in all Adaptive Reuse projects.**
7. **Expand IX1 to reflect the true boundaries of the Skid Row neighborhood.**
8. **Expand Community Facilities incentives to support street vendors and Small Legacy Businesses.**
9. **Prevent displacement and promote good garment manufacturing jobs.**
10. **Create stronger standards for hotel development review.**

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The Downtown Community Plan presents an important and timely opportunity to establish a framework for equitable growth and a just recovery. If done right, this Plan can protect current low-income and houseless Downtown residents, create new opportunities for safe and affordable housing, open the economy to low-income entrepreneurs, and establish a model for equitable community planning. Thank you for considering these recommendations and please reach out with any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Nancy Halpern Ibrahim", with a long horizontal flourish extending to the right.

Nancy Halpern Ibrahim  
Executive Director

**Building hope with community**

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3655 S. Grand Avenue, Los Angeles, CA 90007 \* tel 213-748-7285 \* fax 213-748-9630 \* [esperanzacommunityhousing.org](http://esperanzacommunityhousing.org)

## Communication from Public

**Name:** LEAP (Leadership Education for Asian Pacifics)

**Date Submitted:** 04/18/2023 11:07 AM

**Council File No:** 22-0617

**Comments for Public Posting:** April 18, 2023 Los Angeles City Council Planning and Land Use Management Committee 200 N. Spring Street Los Angeles, CA 90012 Delivered via electronic mail. RE: [CF 22-0617] – Downtown LA Community Plan Update 2040 Dear Councilmembers, As the President and CEO of LEAP (Leadership Education for Asian Pacifics), a long-standing, Little Tokyo-based national nonprofit organization, I submit this letter in support of the Central City United (CCU) Coalition’s comments and policy recommendations that would ensure that the Downtown LA Community Plan will promote equity and justice throughout downtown. Along with CCU, I thank and appreciate the Planning Department and the City Planning Commission for their role in drafting and advancing a plan that incorporates many of the community-centered policy recommendations put forth by CCU. CCU is multi-neighborhood coalition led by Little Tokyo Service Center (LTSC), the Los Angeles Community Action Network (LA CAN), and the Southeast Asian Community Alliance (SEACA), along with Public Counsel. Together with the key organizations embedded in Little Tokyo, Skid Row, and Chinatown, CCU formed to lift up the voices and concerns of Downtown’s poorest and most vulnerable residents and stakeholders in the community plan update process. As the City continues to grapple with institutional racism and structural injustice, I applaud the Department of City Planning for acknowledging the deep harms that past land use and planning policies have inflicted on low-income communities and communities of color. Now, as the City commits to repairing these harms, the Community Plans are a tool to do just that. As the framework for growth, development, and investment in Downtown for years to come, this Plan must center the needs and priorities of those communities that have been most harmed. To advance an even more inclusive and equitable Downtown Community Plan, I ask the City to adopt the following changes recommended by CCU, and to approve and pass the Plan by May 12. Any delay not only creates uncertainty, but puts us in violation of state housing law, preventing us from addressing the housing crisis that plagues our city. 1. Adopt the graduated affordable housing program recommended by the Department of City Planning. 2. Ensure that new affordable housing created by the

Plan is actually located in the Downtown LA Community Plan Area. 3. Require mixed-income projects to utilize Schedule 6 rents for affordable units. 4. Include a new Program creating a Displacement Impact Analysis. 5. Require replacement of Acutely Low, Extremely Low and Very Low-Income units at the same or lower affordability level and apply this requirement across all projects. 6. Include on-site affordable housing in all Adaptive Reuse projects. 7. Expand IX1 to reflect the true boundaries of the Skid Row neighborhood. 8. Expand Community Facilities incentives to support street vendors and Small Legacy Businesses. 9. Prevent displacement and promote good garment manufacturing jobs. 10. Create stronger standards for hotel development review. \*\*\* The Downtown Community Plan presents an important and timely opportunity to establish a framework for equitable growth and a just recovery. If done right, this Plan can protect current low-income and houseless Downtown residents, create new opportunities for safe and affordable housing, open the economy to low-income entrepreneurs, and establish a model for equitable community planning. Thank you for considering these recommendations and please reach out with any questions. Sincerely, Linda Akutagawa President & CEO



April 18, 2023

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

***Delivered via electronic mail.***

RE: [CF 22-0617] – Downtown LA Community Plan Update 2040

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Sincerely,

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Linda Akutagawa  
President & CEO