

Communication from Public

Name: Nella McOsker
Date Submitted: 04/19/2023 12:33 PM
Council File No: 22-0617
Comments for Public Posting: Please see attached letter



April 19, 2023

Councilmember Marqueece Harris-Dawson
Chair, Planning and Land Use Management Committee
200 N. Spring Street
Los Angeles, CA 90012

Re: Council File 22-0617, DTLA 2040 Community Plan – CCA Technical Design Recommendations and Language Clarifications

Dear Councilmember Harris-Dawson,

CCA is committed to DTLA's vibrancy and increasing opportunity in the region. We have been deeply engaged on DTLA 2040 over the approximately decade-long process to develop the plan and have submitted a [letter](#) to this committee with our policy recommendations centered around creating housing at all income levels. **We offer this letter as a follow-up to our policy-focused letter to highlight fine-grained technical design and language clarification issues and provide recommendations to ensure the plan is usable.**

River-adjacent MM1 Zone

The plan currently proposes to apply the MM1 Form District to a swath of properties near the LA River in the Arts District. The MM1 zone is highly restrictive compared to the adjoining MB3 Form District. The MM1 zone would impose a 20-foot setback from the LA River, despite the fact that these properties are already set back 200 feet from the LA River by existing railroad tracks. The MM1 zone would also uniquely limit buildings to 18 stories and allow for up to 4.5 FAR, although a Metro rail station is planned for this location. **We recommend the river-adjacent MM1 Form District in the Arts District be changed to the MB3 Form District to align with the more appropriate zoning and design approach for surrounding properties.**

Form District LM2 and LN 1 Building Width Requirements

The currently proposed building widths in DTLA 2040 in the LM2 and LN1 Form Districts, when paired with other development standards, do not allow for the development of efficient double-loaded residential buildings as the building width after upper-floor step-backs is too narrow to accommodate the units and needed circulation. This means projects cannot achieve the maximum allowable density for these sites that the plan envisions, reducing what can feasibly be built. **We recommend revising the LM2 form district to allow for 160-foot building width (same as LM1) and revising LN1 form district to allow for 95-foot building width, which would align the Form Districts with the achievable capacity envisioned by the plan.**

Building Massing Requirements – Outdoor Amenity Space Depth

The currently proposed proportions for outdoor amenity space (the depth to be 5 times the width) would result in very deep, narrow outdoor amenity spaces, which would be shaded much of the time, and any residential units toward the rear end of these spaces would have limited sunlight access. **We recommend revising building massing requirements to reduce the required outdoor building amenity space depth to 1.5 times the minimum building break dimension, which would feasibly accommodate more housing units and foster better amenity space as intended by the plan.**

Telecommunications Facilities Language

We understand that there are concerns regarding ambiguous language pertaining to telecommunications facilities in the new zoning code and that clearer information is needed. **In order to clarify the intent of the code and memorialize the**



permissibility of wireless telecommunications uses, we recommend 1) modifying Section 5B.5.2 (Commercial-Mixed 2) to allow “Wireline and Network Telecommunications Services Facilities, including switching and exchange facilities, data centers, cloud storage, and internet-supporting facilities” as permitted uses and 2) modifying Section 5C.1.2.L.1 (Public & Institutional Uses) to delete telecommunications switching facilities from the definition of minor utility infrastructure with no-onsite personnel.

We believe these changes, while technical in nature, are important to improve clarity and usability of the plan and are in keeping with the plan’s goals. Thank you for your consideration of DTLA 2040 and our recommendations.

Sincerely,

A handwritten signature in black ink, appearing to read "Nella McOsker", written in a cursive, flowing style.

Nella McOsker
CEO & President

cc: Honorable Members of the PLUM Committee
Councilmember Kevin de León, District 14
Councilmember Eunisses Hernandez, District 1

Communication from Public

Name: Karen Umemoto

Date Submitted: 04/19/2023 10:09 PM

Council File No: 22-0617

Comments for Public Posting: Los Angeles City Council Planning and Land Use Management Committee 200 N. Spring Street Los Angeles, CA 90012
Delivered via electronic mail. April 19, 2023 RE: [CF 22-0617] – Downtown LA Community Plan Update 2040 Dear Councilmembers, I write 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. I 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, 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. Adopt the graduated affordable housing program recommended by the Department of City Planning. Ensure that new affordable housing created by the Plan is actually located in the Downtown LA Community Plan Area. Require mixed-income projects to utilize Schedule 6 rents for affordable units. Include a new Program creating a Displacement Impact Analysis. 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. Include on-site affordable housing in all Adaptive Reuse projects. Expand IX1 to reflect the true boundaries of the Skid Row neighborhood. Expand Community Facilities incentives to support street vendors and Small Legacy Businesses. Prevent displacement and promote good garment manufacturing jobs. 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, Karen Umemoto, Ph.D. UCLA Department of Urban Planning (affiliation for identification purposes)

Communication from Public

Name: Hayk Makhmuryan

Date Submitted: 04/19/2023 09:13 AM

Council File No: 22-0617

Comments for Public Posting: I'm writing in SUPPORT of Skid Row Now and 2040 community plan, in support of agendizing and moving the DTLA community plan forward! I'm writing in support of retaining and expanding the IX1 zone to all of Skid Row neighborhood, 3rd to 7th St and Alameda to Main St. As a 15 year arts organizer and art worker in Skid Row neighborhood, I write in support of listening to and centering the point of view of Skid Row Now and 2040 coalition, and being able to see through the bad faith, self-serving, sugar coated economic and racial cleansing arguments of the likes of downtown BIDs. As the city, you are an institution that unambiguously serves the public. If you prioritize serving and listening to business groups that already can serve themselves and have an outsized voice, you are abandoning the least of your responsibilities. If the word "equity" actually means anything to you, the least you are required to do is to help counter-balance this. We, the people living and working to strengthen and support Skid Row neighborhood (and by extension, poor, low-income unsurprisingly most often Black, Indigenous and immigrant neighborhoods and communities across this country) will continue to come together and find the most innovative, creative, and effective ways to support each other and create a world that is friendly, kind, and inclusive for everyone. But you, the city, must do your part; because the longer you wait, the more of most vulnerable people's lives and livelihoods get destroyed on your watch.

Communication from Public

Name: Carol Zou

Date Submitted: 04/19/2023 02:45 PM

Council File No: 22-0617

Comments for Public Posting: 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. I 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. More details are in the attached letter. Thank you!

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

April 19, 2023

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

Dear Councilmembers,

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. I 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, 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,

Carol Zou
Artist
Little TOKyo

Communication from Public

Name:

Date Submitted: 04/19/2023 03:55 PM

Council File No: 22-0617

Comments for Public Posting: See attachment



AAPI Equity Alliance
905 E 8th St
Los Angeles, CA 90021

April 19, 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,

AAPI Equity Alliance 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. 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.

AAPI Equity Alliance is a coalition of over 40 community-based organizations that serve and advocate for the 1.5 million Asian Americans and Pacific Islanders (AAPIs) in Los Angeles County. We are also a co-founder of Stop AAPI Hate, a national coalition to address hate against AAPIs.

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.

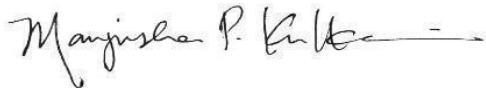
As the City continues to grapple with institutional racism and structural injustice, we applaud the Department of City Planning for acknowledging the deep harms that past land use and planning policies have inflicted on low-income communities and communities of color. Now, as the City commits to repairing 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 may put 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,

A handwritten signature in black ink, reading "Manjusha P. Kulkarni". The signature is fluid and cursive, with a horizontal line extending from the end.

Manjusha Kulkarni
Executive Director
AAPI Equity Alliance