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Public Comments Not Uploaded Fwd: DTLA 2040 Comments (CF 22-0617)

1 message

Office of the City Clerk <cityclerk@lacity.org>

Thu, Apr 6, 2023 at 2:14 PM

Reply-To: clerk.plumcommittee@lacity.org

To: Clerk-PLUM-Committee <clerk.plumcommittee@lacity.org>

----- Forwarded message -----

From: **LA Fashion District BID** <jasmine@fashiondistrict.org>

Date: Thu, Apr 6, 2023 at 2:10 PM

Subject: DTLA 2040 Comments (CF 22-0617)

To: <CityClerk@lacity.org>

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,

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