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April 24, 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 Community Plan Update

Dear Chair Harris Dawson & Honorable Members of the PLUM Committee:

The proposed Downtown Community Plan Update (“CPU” or “Plan”) aims to encourage the development of badly needed housing, especially affordable housing in Downtown Los Angeles. However, when considering the CPU in connection with the other proposed actions—including the adoption of the new zoning code (i.e., Chapter 1A Zoning Code Ordinance) (commonly referred to as “Re-Code”), Map Zone Changes, and Downtown Community Plan Implementation Overlay (“CPIO”)—it also promotes hotel development even when that development could displace opportunities to build new housing, create local community impacts and threaten historic industries, like the garment industry, in Los Angeles.

To address these deficiencies, we the undersigned, respectfully urge the Planning and Land Use Management (“PLUM”) Committee to consider the following proposed amendments to the Plan, Re-Code, and/or CPIO:

1. Require a conditional use permit (“CUP”) appealable to City Council for any hotels (now called lodging under Re-Code) in all places where hotels are permitted by the plan. This would allow for consideration of project impacts on the community, local hiring, and the appropriateness of the use.
2. Do not rezone the Fashion District or Arts District to make hotels permissible.
3. Adopt the recommendations outlined in the Garment Worker Center’s and Coalition to Protect LA’s Garment Jobs letter uploaded to Council File 22-0617 on 4/21/23. This letter includes a requirement for light manufacturing job productive uses, expansion of the Community Plan Implementation Overlay (CPIO) A.5 Employment Incentive Subarea in the Fashion District, prohibition of hotels in the Fashion District, and workforce development programs.

We urge the city to require a CUP for all lodging in the Plan area to be decided initially by the City Planning Commission and appealable to the City Council. This can be done by amending the Plan, Re-Code, and/or CPIO so that all zoning categories in which lodging is allowed (CX1, CX2, C3) are treated as a “Class 3” CUP (which means they are heard by the City Planning Commission and then appealable to the City Council). Additionally, lodging should be prohibited in the IX2, IX3, and IX4 zones to preserve those land areas for manufacturing and some housing uses (rather than hotels).

The CUP requirement could be achieved by: (a) re-introducing “footnotes” to the CPU map, (b) amending the Re-Code “Supplemental Standards” applicable for lodging, and/or (c) amending the CPIO’s Section 1-5 “Relationship to Other Zoning Regulations.” Whether in a revised CPU, Re-Code, or CPIO provision, the CUP should substantively include the following:

Lodging projects in the boundaries of the CPU/CPIO are required to obtain a Conditional Use Permit with approval by the City Planning Commission and appealable to the City Council (i.e., Class 3 Conditional Use Permit of Chapter 1A of the Zoning Code). In addition to the findings required by Section 13B.2.3 of Chapter 1A of the Zoning Code, the City Planning Commission or City Council on appeal shall consider and make express findings on each of the following:

- (a) that there is sufficient market demand for the Lodging project proposed;*
- (b) that the Lodging Project will not unduly and negatively impact demand in the City for affordable housing, public transit, child-care, and other social services, taking into consideration the impact of the part-time or seasonal nature of work at the Lodging project and of the Lodging Project employees' expected compensation;*
- (c) whether the applicant will take measures to employ residents of neighborhoods adjoining the Lodging Project in order to minimize increased demand for regional transportation and to reduce demand for vehicle trips and vehicle miles traveled;*
- (d) whether the applicant will take measures to encourage hotel workers and guests to use public transportation, cycling and other non-automotive means of transportation;*
- (e) whether the Lodging Project will displace or negatively impact small businesses in the immediate vicinity and whether the applicant will adopt any measures to increase demand for local goods and services; and*
- (f) That the project will not negatively affect the availability of affordable and rent-stabilized housing within the plan area. That the project includes the replacement of any rent stabilized or restricted affordable housing existing on site within the past ten years with affordable housing and any non-restricted or rent stabilized housing with moderate income housing OR The project shall not demolish any building in which there were rent stabilized housing uses or deed restricted housing uses in the last ten years or replace in whole or part any such uses.*

In closing, we appreciate the opportunity to provide these comments. Housing needs to be incentivized and the garment worker industry should be protected; however, there is no need to give unjustified by-right status and FAR giveaways for hotel uses—especially when doing so may displace desperately needed housing opportunities and create site-specific environmental and other impacts.

Sincerely,

