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April 22, 2023
VIA E-MAIL

Honorable Members
Planning and Land Use Management Committee (PLUM)
c/o PLUM Committee Clerk
200 N. Spring Street, Room 340
Los Angeles, CA 90012
Email: clerk.plumcommittee@lacity.org

**Re: Council File: 22-0617
Downtown Los Angeles Community Plan Update: "DTLA 2040"**

Dear Honorable Members:

We are writing on behalf of our client Alameda Square Owner, LLC ("ASO") who owns ROW DTLA located at 747-787 South Alameda Street and 1318-1320 East 7th Street in the city of Los Angeles ("City") (the "Site" or "ROW DTLA"). The Site is a 31.3 acre campus that contains over 1.6 million square feet of historic buildings of which 1 million square feet has been preserved and modernized to support commercial and light manufacturing, modern creative office and artistic and creative uses. The Site is bounded 7th Street to the north, Alameda Street to the east and Central Avenue to the west and has been historically utilized and surrounded by textile, garment and produce industry uses. **With the new Downtown Los Angeles Community Plan and new Zoning Code update, we request that this Site be designated IX3 and that there be an additional use standard to the IX3 for Dwellings that reads as follows:**

"For residential development within sites larger than 20 acres with existing Office, Manufacturing Light: General, Manufacturing Light: Artistic and Artisanal uses, the existing uses, whether located on the same lot or different lots within the site, may be counted as meeting the criteria for developing the dwelling units in conjunction with those other uses."

When ASO purchased the Site in 2014, it was heavily underutilized. There was only a coffee shop in business, two office tenants and a wholesale produce market. Today the Site contains 46 retailers and restaurants and another 48 office tenants which span multiple industries including technology, apparel, construction, produce wholesale and consumer goods. On any given day over 2,300 people come to work, shop and frequent the Site, now known as ROW DTLA. As industrial-hybrid classifications have



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become more common in zoning codes, they serve to maintain light industrial and commercial job opportunities that contribute to the regional economy on historically industrial land that is increasingly being repurposed for non-industrial uses in transitioning urban neighborhoods. ROW DTLA has long shared that vision and is now looking to evolve the Site into a true live/work community in which light industrial employment exists alongside housing. Phase one of ROW DTLA was to bring business and jobs back to the Site which has been accomplished and we continue those efforts. Phase two is to layer in housing to the project. As such, ASO is currently considering the second phase of development to place multi-family residential on the Site that will add over 3,000 units of needed housing in order to create vitality, promote sustainability and foster a true live/work community. With Metro's anticipated West Santa Ana Branch transit corridor to end at Union Station with a potential route along Alameda Street, a second phase of development at ROW DTLA could intensify housing growth near transit and major job centers, promote infill development and encourage synergy through a greater mix of uses in a part of Downtown has not currently seen this type of development.

Located on the southwest corner of Alameda and 7th Street, the Site's current zoning is M2-2D with a proposed DTLA 2040 land use designation of IX4, similar to other properties in the Arts District. However, as the historic home to garment and textile production and adjacent to long serving produce marts, the Site is more an extension of the Fashion District rather than an off shoot of the Arts District. As stated above, we request this Site be designated IX3 as ROW DTLA has already been developed to promote a mix of uses that support creative production industries, accommodate a wide variety of employment as well as cultural and recreational opportunities that are more aligned with the intent of an IX3 designation. We would also request an additional use standard to the IX3 designation for Dwellings that reads as follows:

"For residential development within sites larger than 20 acres with existing Office, Manufacturing Light: General, Manufacturing Light: Artistic and Artisanal uses, the existing uses, whether located on the same lot or different lots within the site, may be counted as meeting the criteria for developing the dwelling units in conjunction with those other uses."



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This would allow a site, like ROW DTLA, that already has close to a million square feet of existing office, commercial and creative space for artists and other users, to create housing, without having to add additional commercial and light industrial uses that would compete with existing uses on Site. Row DTLA has already created and continues to create employment opportunities, and adding housing is the next step to achieving a true live/work community.

Further, as demonstrated above, this Site serves an existing project that is massive in scope with uses that are evolving and changing over time, to be built in phases over years and possibly decades. Projects this large and of this nature can benefit from specific planning and accommodations. Similar to the request made by Council District 14, we believe DTLA 2040 should anticipate this process by creating a tailored discretionary review and approval planning process, such as a Planned Development designation, for projects over 20 acres to ensure that such projects develop a specific long-term planning and land use program that allows a project's goals to be met over an extended period of time rather than simply at the moment of passage. We ask that this Site be granted this type of designation in the final DTLA 2040 plan.

Best regards,

A handwritten signature in black ink, appearing to read 'KC' followed by a stylized flourish.

Kyndra Casper

KC:

cc. Councilmember Marqueece Harris-Dawson (councilmember.harris-dawson@lacity.org)
Councilmember Monica Rodriguez (councilmember.rodriguez@lacity.org)
Councilmember Katy Yaroslavsky (councilmember.yaroslavsky@lacity.org)
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