

# CITY OF LOS ANGELES

CALIFORNIA



## DOWNTOWN LOS ANGELES NEIGHBORHOOD COUNCIL OFFICERS

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## DOWNTOWN LOS ANGELES NEIGHBORHOOD COUNCIL

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DLANC Office Coordinator: Ted Greaton  
(10am-2pm/Monday-Thursday)

January 9, 2008

S. Gail Goldberg, AICP  
Director of Planning  
Los Angeles Department of City Planning  
200 North Spring Street, 5<sup>th</sup> Floor  
Los Angeles, California 90012

Cecilia V. Estolano  
Chief Executive Officer  
The Community Redevelopment Agency of LA  
354 South Spring Street, Suite 800  
Los Angeles, California 90013

RE: **Industrial Land Use Policy Project – Downtown**

Dear Ms. Goldberg and Ms. Estolano:

At its regularly held public meeting on January 8, 2008, the Board of Directors of the Downtown Los Angeles Neighborhood Council (“DLANC”) voted to submit the following comments with respect to the January 3, 2008 Memorandum on Staff Direction Regarding Industrial Land Use And Potential Conversion To Residential Or Other Uses (“ILUP Memo”), pursuant to the motion passed on December 18, 2007 by DLANC’s Planning & Land Use Committee.

DLANC strongly supports the ILUP Memo’s general goals of protecting current jobs and creating new ones, and recognizes that land use and zoning is one critical element necessary to further those goals. Downtown has been the City’s major employment center for over a century, and will continue to be so into the foreseeable future.

However, for the reasons detailed below, DLANC has serious concerns about both the process followed by the Department of City Planning (“Planning”) and the Community Redevelopment Agency (“Agency”) in generating the ILUP Memo, and the substance of certain recommendations therein. Also, given the limited amount of time DLANC has had to review the lengthy and complex ILUP Memo and related backup materials, please note that these comments are preliminary and may be supplemented.

### **A. Procedural Issues**

First, DLANC believes that the limited notice and opportunity for public comment provided is inappropriate for an issue of significance to the Greater Downtown community. Combined with the recent decision by Planning to increase the Quimby fees assessed for live-work units, DLANC is concerned about an apparent trend by the department to reverse long-standing planning policies impacting Downtown with little to no public outreach or ability for Downtown stakeholders to participate or comment on those changes.

The above concern is not lessened, but rather heightened, by the assertion of the departments that the recommendations in the ILUP Memo will be implemented by staff – effective immediately – without any vote to be taken by the City Planning Commission, the CRA Board of Directors, or the City Council. This is a significant change from the process described during the initial public outreach on this issue, and suggests that participation by Downtown stakeholders at the upcoming meetings of the City Planning Commission or CRA Board of Directors will be meaningless.

In addition, it appears that the process followed by the departments in generating the final ILUP Memo disregarded comments provided by DLANC and other stakeholders in response to the preliminary industrial land use policy recommendations. A copy of DLANC’s prior motion on this issue is attached for reference; it appears that each of the three requests therein was ignored, in whole or part, by the departments. Similarly, the departments did not engage in a meaningful discussion on the preliminary recommendations with a Downtown stakeholders working group, as directed by the City Council pursuant to the Motion presented by Councilmember Jan Perry on February 16, 2007.

**B. Substantive Concerns**

First, while DLANC agrees that preservation of land supporting employment is an important planning goal, it must be pointed out that there are other competing goals in the City’s General Plan Framework that may be equally important, including production of necessary housing, and provision of adequate infrastructure and public services. As one example, General Plan Framework Goal 3G encourages: “A Downtown Center as the primary economic, governmental, and social focal point of the region with an **enhanced residential community.**” (Emphasis added). By concluding that the goal of “preservation of industrial land” supersedes all others in the General Plan, the ILUP Memo imposes a policy determination that should properly be the province of the City’s elected officials.

Second, DLANC cannot agree with the departments’ assertion that the ILUP Memo effects no change to existing City policy. The study of industrial land uses was prompted by a long-standing practice – including decisions made by Planning and the Agency – in favor of allowing residential or mixed-use conversion of industrially-zoned land in certain areas of Downtown and elsewhere. Whether or not this trend was the result of case-by-case decisions versus a formal general or community plan update, those decisions reflected the City’s de facto policy. This policy direction has been relied upon by various Downtown stakeholders, including residents, businesses and developers. The ILUP Memo’s intention to reverse that policy is a substantive change and should be treated as such.

Similarly, it is not appropriate for the ILUP Memo to effect a significant land use policy change in Downtown and provide no meaningful opportunity to revise the new policy other than the community plan review process. We note in this regard that the Central City North Community Plan is not scheduled for revision; further, no public meetings have yet been held regarding the Central City Community Plan, which is just beginning a revision process that will take at least three-years. This is true despite numerous requests from Downtown stakeholders that those community plan revisions be expedited in recognition of the fact that Downtown is by far the most rapidly-developing area of the City.

In addition, it is unclear whether there has been any analysis about how many pending projects will be affected by implementation of the new policy, or of the environmental impacts of the policy. These policy changes have the potential to effectively kill the positive resurgence in developer-initiated investments into large areas of Greater Downtown – investments which the City has both initiated and promoted over the past 5 years. The public and the City’s decision-makers are entitled to know all of the potential effects these new policies will have – including the adverse effects on the City’s competing housing policies.

Finally, DLANC is concerned that the ILUP Memo did not give adequate consideration to recent developments relevant to Downtown's industrial zones, including the on-going expansion of the Arts District and the City's commitment to revitalization of the Los Angeles River. DLANC believes it is critical for stakeholders and policymakers to hold meaningful discussions to balance the land use goals behind each of these important initiatives, and look for creative solutions to ensure that all of these uses are compatible with each other.

### **C. Conclusions**

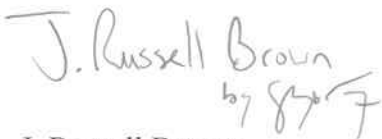
Based on the above, DLANC requests that Planning and the Agency take the following action:

1. immediately halt the implementation of the ILUP Memo with respect to the Greater Downtown areas, and schedule workshops and other opportunities for meaningful public participation;
2. immediately fund and commence the revision/update of the Central City North Community Plan;
3. promptly evaluate and report to the City Council on whether the community plan revision/update process for the Central City and Central City North Community Plan areas can be expedited to be completed in less than two years; and
4. form a working group with Downtown stakeholders (including DLANC, the Central City Association, the Central City East Association, and the relevant business improvement districts) to have an on-going role in evaluating recommendations on industrial land use policy. As an initial matter, the Downtown working group should consider (a) preparation of an Arts District specific plan and/or overlay zone, (b) evaluating ways to increase employment opportunities through live-work projects in the Greater Downtown area.

As a Neighborhood Council certified by the City of Los Angeles, DLANC represents the interests of a wide variety of Downtown stakeholders, including residents, businesses, employees, employers, cultural organizations, artists, homeless people and social service providers. As we work together in the future, we look forward to planning for a growing, vibrant and revitalized community that is socially and economically sustainable.

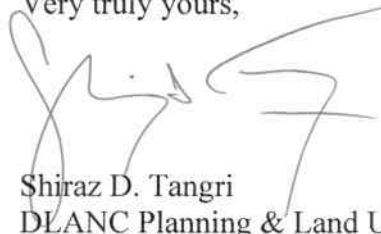
Please provide a copy to DLANC at the address listed above any subsequent directives, studies or other documents generated by Planning or the Agency regarding industrial land use policy. Thank you for your attention to this matter.

Very truly yours,



J. Russell Brown  
DLANC President

Very truly yours,



Shiraz D. Tangri  
DLANC Planning & Land Use Committee Co-Chair

Attachment A: DLANC Motion on Preliminary Recommendations for Industrially Zoned Land

CC: Mayor Antonio Villaraigosa  
Councilmember Ed Reyes (Council District 1)  
Councilmember Jan Perry (Council District 9)  
Councilmember Jose Huizar (Council District 14)  
Los Angeles City Planning Commission  
CRA Board of Directors

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## DOWNTOWN LOS ANGELES NEIGHBORHOOD COUNCIL Board of Directors

### MOTION

On November 14th, 2006, the City of Los Angeles hosted a presentation of "Preliminary Recommendations for Industrially Zoned Land in the Greater Downtown Los Angeles Area."

The City's recommendations cover more than 2,000 acres of industrially zoned land in Council Districts 1, 9 and 14, including Downtown, Chinatown and Boyle Heights. CCEA represents 2/3 of Industrial Downtown (approx. 1,000 acres), including the majority of two study sub-areas: Downtown Industrial Core and Alameda Industrial. A majority of the Downtown Industrial Core sub-area falls within CCEA's Downtown Industrial BID (some is within the Fashion District). Most of the sub-area described as Alameda Industrial is better known as the Downtown Arts District. The Arts District, also managed by CCEA, recently became the 10th Business Improvement District (BID) in Downtown LA.

Subsequent review of the recommendations by area stakeholders suggests that some of the underlying data may be inaccurate. The Central City East Association, the Central City Association the Los Angeles Fashion District and Downtown Los Angeles Neighborhood Council recently requested additional information from City Planning and the Community Redevelopment Agency to assist us in our analysis of the preliminary recommendations. These entities represent a significant majority of the industrially zoned land in Downtown Los Angeles.

There is also concern that the study of industrial land may not have considered current and past planning efforts and the articulated community goals. The face of Downtown has changed dramatically since 1999 – yet the demographic data used in the Industrial Land Use Policy was taken from the 2000 Census, and arguably reflects none of that change. The recommendations examined 2,000 acres of industrial land in Downtown yet ignored thousands of acres of non-industrial land existing alongside it. Land use policy is critical community-building issue that should address the entire community rather than pieces of it. Furthermore, the policy development process should include property owners, residents, businesses and other community stakeholders. While the revitalization of Downtown LA is a reality, considerable work remains to link Downtown's various districts and create a cohesive, world-class city center. Industrial land use must be reevaluated within the larger context of 21<sup>st</sup> century urban planning.

As such, many stakeholders in the Downtown community would like to consider, as an alternative, the opportunity to address urban planning for the eastern portion of downtown, utilizing a more conventional and comprehensive format (e.g., community plan update). This format could examine a host of issues such as industrial zoning alongside other important land use issues facing the area.

Therefore, DLANC in partnership with other downtown BIDs including Downtown Arts District BID, Fashion District BID and Downtown Center BID Board of Directors HEREBY RESOLVES to request that Councilmember Jan Perry (9<sup>th</sup> District), Councilmember José Huizar (14<sup>th</sup> District) and Councilmember Ed Reyes (1<sup>st</sup> District) direct the City Planning Department and the Community Redevelopment Agency to:

- 1) Extract the Downtown Recommendations from the larger Citywide industrial land use policy process, thereby allowing recommendations for Hollywood and West LA to move forward unencumbered by Downtown LA.
- 2) Make the underlying study data and reports available to the public on the City Planning department website.
- 3) Request the relevant City Departments to report back to City Council on the feasibility of undertaking Community Plan updates for the Central City and Central City North Community Plan areas.

On behalf of the DLANC board & all downtown stakeholders,

J. Russell Brown

President- Downtown LA Neighborhood Council