

November 23, 2020

Shana M. Bonstin Deputy Director,  
Community Planning Bureau  
Los Angeles Department of City Planning  
200 North Spring Street  
Los Angeles, California 90012

**RE: Draft Environmental Impact Report (EIR): Downtown Community Plan Update/New Zoning Code for Downtown Community Plan; DLANC Comments as of November 23, 2020**

Dear Ms Bonstin:

At a public meeting on November 23, 2020, the Board of Directors of the Downtown Los Angeles Neighborhood Council (“DLANC”) voted to provide the following comments below pursuant to the motion passed on November 16, 2020, by DLANC’s Planning & Land Use Committee (“PLUC”).

Background: DLANC previously provided a letter to Los Angeles Department of City Planning dated January 29, 2019 including comments to the Draft 2040 Plan. DLANC reviewed the revised Downtown Community Plan and other documents included in the DEIR. This letter includes some comments carried through from the previous letter that have not been addressed as well as additional comments on the revised Community Plan and other documents in the DEIR for your consideration.

**COMMENT 1: Adoption of Downtown Community Plan**

Section 2.2 of the DEIR states that the primary issue to be resolved through the planning and environmental review process for the Proposed Project is whether the City should adopt the updated Downtown Plan and New Zoning Code to replace the existing community plans and code.

DLANC conditionally supports the adoption and implementation of the Downtown Community Plan as revised and included in the DEIR. DLANC support is conditioned on incorporation of the following stipulations and comments below for the plan. DLANC support may include other items of stipulation and additional comments as the Community Plan process progresses and the Final EIR document is modified.

**COMMENT 2: Preferred Alternative**

The DLANC Board supports the adoption of Alternative 3: Increased Development Potential. Alternative 3 would result in the highest level of development in all areas of Downtown Los Angeles to meet all the basic project objectives, which are in line with the DLANC Vision Document. Simply put, Alternative 3 is the most in line with the guiding policies of the DLANC Vision Document of all Alternatives.

**COMMENT 3: Existing Regional Parks or Recreation Facilities**

The Draft EIR identifies an impact of Significant and unavoidable. The DLANC Board requests the Downtown Plan designate more land area for Parks and Open Space to accommodate for the



DOWNTOWN LOS ANGELES NEIGHBORHOOD COUNCIL

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anticipated growth proposed in this plan.

**COMMENT 4:** The DLANC Board supports level 1 of the community benefits program provision for affordable housing in the DTLA 2040 plan, which requires the option for on-site, in-lieu fee, off-site and off-site acquisitions, all located in Downtown LA.

**COMMENT 5:** The DLANC Board rejects the DTLA2040 plan’s proposed exclusion of market rate housing and rejects the requirement of 100% affordable housing in any one specific area/land use designation in downtown.

**COMMENT 6:** The DLANC Board rejects the average unit size of 1,000 SF in any area within Downtown.

**COMMENT 7:** The DLANC Board requests traditional residential dwelling units be allowed in all areas in addition to those currently shown as being restricted to live-work only units in the Industrial-Mixed districts.

**COMMENT 8:** The DLANC Board requests a proposal that allows any area within ¼ mile radius of an existing or planned Metro station, including the location at 7th and Alameda, to have the “Transit Core” FAR and land use designation. The historic Broadway corridor south of 3rd Street should be exempt from this request.

**COMMENT 9:** The DLANC Board rejects the inclusion of all Parking Requirements at any location in Downtown.

**COMMENT 10:** The DLANC Board request to reconsider the toy district zoning to remove height restrictions.

Please provide a digital copy of your responses to these comments and any decisions on any actions taken based on these comments in a letter by mail to [planning@dlanc.com](mailto:planning@dlanc.com). Thank you in advance for your consideration of the comments presented in this Letter.

Very truly yours,

Very truly yours,

**\* SUBJECT TO APPROVAL BY DLANC BOARD OF DIRECTORS ON November 10, 2020\***

Patricia Berman  
DLANC President

Ryan Afari  
DLANC Planning & Land Use Committee Chair

CC: Kevin de Leon (Council District 14) (via email)  
Gil Cedillo (Council District 1) (via email)  
Curren Price (Council District 9) (via email)