



September 14, 2021

City Planning Commission
Los Angeles Department of City Planning
200 North Spring Street
Los Angeles, California 90012

CPC-2017-432-CPU; CPC-2014-1582-CA

RE: Downtown Los Angeles 2040 Community Plan Update

Dear Commissioners:

At a public meeting on September 14, 2021, the Board of Directors of the Downtown Los Angeles Neighborhood Council (“DLANC”) voted to provide the following comments below:

DLANC previously provided a letter to Los Angeles Department of City Planning dated January 29, 2019, with comments to the Draft 2040 Plan and a subsequent letter dated November 23, 2020, with comments to the Draft Environmental Impact Report (EIR) for the Downtown Community Plan Update/New Zoning Code for Downtown Community Plan.

DLANC reviewed the revised Draft Community Plan published in June, 2021. This letter includes two comments based on previously provided comments. Please note, it is the intention that the City addresses and implements both comments together. Implementation of both Comments 1 and 2 is expected to result in a positive impact on the inventory and distribution of affordable housing. However, if the City implements Comment 1 without implementing the solutions proposed in Comment 2, this could result in negative impacts to affordable housing.

COMMENT 1:

As previously stated in the letter dated November 23, 2020, DLANC rejects the DTLA 2040 Plan’s proposed exclusion of market-rate housing and rejects the requirement of 100% affordable housing in any one specific area or land use designation downtown. Rather,

affordable housing should be distributed across the entirety of the community plan area as possible by the zoning code.

The current community plan with revisions as of July 2021 still includes an area in Center City-East that excludes market-rate housing and disproportionately concentrates affordable housing through the CX2 and IX1 zoning designation, rather than encouraging a mix of housing and land use typologies. This policy perpetuates longstanding inequitable zoning practices that have concentrated poverty and contribute to segregation in ways similar to historical practices such as “Containment” and “Red-lining.”

DLANC’s Vision Plan states, as one of its Land Use Guiding Principles, “As it continues to grow, Downtown should prioritize housing in future developments – for all incomes and generations.” Therefore, DLANC encourages the provision of affordable housing throughout downtown instead of being concentrated in any one area.

It is understood by DLANC that the intention for retaining an area for 100% affordable housing is to protect existing affordable housing stock and avoid gentrification. However, the practice of concentrating on affordable housing does a disjustice to the residents of the area and does not adequately provide enough affordable housing in the long term. A more equitable and sustainable solution should be created for the provision of affordable housing throughout the downtown and the City Los Angeles so that families of all incomes and levels can have the opportunity to live in all neighborhoods.

COMMENT 2:

The DLANC Board supports a more aggressive community benefits program that includes on-site affordable housing for new developments in Downtown for projects seeking to achieve the maximum FAR or other variances. A more aggressive community benefits program proposed in Comment 2 is a proposed solution to eliminating the 100% affordable housing zone mentioned in Comment 1.

In our previous letters in regards to the draft DTLA 2040 plan, we have supported calls for mandates for funds and fees collected for affordable housing by projects being entitled and constructed in Downtown, to be used for build affordable and supportive housing in Downtown. We have supported increased density surrounding transit centers/stops so that more affordable housing stock can be constructed in areas that allow for easy mobility for those who struggle with access to quality transit options. We have also called for removing average unit minimums so that all neighborhoods in our Downtown can be mixed-income communities.

As such, DLANC supports Councilmember De Leon’s call for the DTLA 2040 Plan to include a more robust alternative affordable housing policy. However, since these policies do not exist at this time, other policy mechanisms should be implemented to both generate and distribute affordable housing throughout the city. Within the Downtown Community plan, one potential solution can be to investigate additional opportunities for community benefits program requirements.

In closing, DTLA 2040 paves the way for setting instrumental planning policy changes for tackling the future growth for Los Angeles in unprecedented ways. It is essential however that

this plan corrects the wrongs of the past and allows for essential investment into communities to bring critical social and community services to neighborhoods that have never had historical investments. We are eager and excited for a more equitable, diverse, and inclusive Downtown for all Angelenos.

*** SUBJECT TO APPROVAL BY DLANC BOARD OF DIRECTORS ON SEPTEMBER 14, 2021***

Sincerely,

(TBD)
President,
DLANC

Ryan Afari,
Chair,
DLANC Planning & Land Use Committee

CC: Council District 1 (via email)
Council District 9 (via email)
Council District 14 (via email)
Craig Weber, Department of City Planning (via email)
Brittany Arceneaux, Department of City Planning (via email)

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 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 any required minimum or average unit size 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.

COMMENT 11: The DLANC Board request to expand the Traditional Core and Transit Core areas east to continue down Maple past 9th street down the 10 Freeway to be consistent with the Federal Opportunity zone boundary and for consistency in the neighborhood.

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. Thank you in advance for your consideration of the comments presented in this Letter.

Very truly yours,



Patricia Berman
DLANC President

Very truly yours,



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)
Cecilia Lamas (Central Planning Commission) (via email)