



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 in 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 affordable housing does an injustice 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 Downtown and the City Los Angeles so that families of all income 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 to 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 Downtown can be mixed-income communities.

As such, DLANC supports Councilmember De León’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, the DTLA 2040 Plan paves the way for setting instrumental planning policy that changes the way 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 severely lacked historical investment. We are eager and excited for a more equitable, diverse, and inclusive Downtown for all Angelenos.

Sincerely,



Claudia Oliveira
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)