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CALIFORNIA



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12 December 2023

Marqueece Harris-Dawson
Chair, PLUM Committee
Councilmember, Council District 8

VIA EMAIL

Re: Community Impact Statement for CF-22-0617-S2

The Downtown Los Angeles Neighborhood Council (DLANC) has reviewed City Planning's REPORT ON ADAPTIVE REUSE INCENTIVE ELIGIBILITY WITHIN THE DOWNTOWN COMMUNITY PLAN, MOTION 54A, ITEM 1;, and would like to express our position as "For if Amended" per the following:

Lowering the By-Right Adaptive Reuse Eligibility Requirement by 15 years (B.1)

Since 2019, DLANC have worked to ensure that DTLA 2040 included an inclusionary housing program. As such, we are very cautious of projects that may, through administrative loopholes, find a way out of such a mandate. Therefore, we support the recommendation that projects within the Downtown plan area younger than 10 years of age should not be allowed to receive approval for adaptive reuse, through a discretionary process or otherwise. This stance ensures that the inclusionary housing obligations integral to the increase in DTLA housing are upheld.

While DLANC supports the adaptive reuse of buildings, we have significant concerns regarding the reduction of age eligibility from at least 25 years to less than 10 years for by-right approval of adaptive reuse projects. We believe this change may create a loophole that would undermine inclusionary housing and community benefits mandates for residential projects. This could lead to an asymmetrical application of these mandates throughout the Downtown plan area, diluting the intended community protections and benefits.

Recommendation: Maintain the age eligibility criterion at 25 years to ensure that adaptive reuse projects do not undermine the inclusionary housing and community benefits goals set forth in the new Zoning Code.

Removing the Requirement for Parking Structures to be at least 10 years old to be eligible for By-Right Adaptive Reuse (E.1)

Given the mandates of AB 1218, the DTLA plan area faces a deadline to significantly expand its electric vehicle (EV) charging infrastructure within the next 11 years. With an estimated 132,000 vehicles permanently based in the area — in addition to the 230,000 vehicles commuting into the plan area on weekdays — the need for adequate charging stations is clear and present. According to the [latest report](#) from Bureau of Street Lighting, the current provision of just 24 EV charging stations is starkly insufficient for this volume of potential EV users.

Our existing parking garages should be considered as an integral asset in this infrastructure challenge. These structures can be retrofitted to incorporate EV charging stations, representing an efficient and cost-effective strategy to address the looming needs. However, the suggested amendment to remove the 10-year-old requirement for by-right adaptive reuse of parking structures threatens to derail this potential. Such a change could significantly hinder the ability of Downtown Los Angeles to prepare for a sustainable and electrified future.

Furthermore, since all residential projects within the Downtown plan area are already subject to inclusionary housing obligations, and these mandates do not apply to adaptive reuse projects, this amendment could allow ARO projects to circumvent these important community obligations. Therefore, DLANC agrees with Planning staff that the current requirement of 10-year requirement be maintained.

Recommendation: Uphold the current requirement of a 10-year minimum age for parking structures to be eligible for by-right adaptive reuse.

Eligibility for Adaptive Reuse Projects Requiring Zoning Administrator Approval (E.2)

To promote the continued transformation of DTLA's aging building inventory, DLANC concurs with the recommendation to eliminate the Zoning Administrator Review for projects at least a decade old, streamlining the adaptive reuse process within the Downtown plan area.

Recommendation: We agree that the requirement for Zoning Administrator Review for ARO projects should be removed.

DLANC is committed to the thoughtful development and preservation of our community. We trust that our recommendations will be considered to ensure that the DTLA 2040 plan reflects the needs and values of our diverse population.

Sincerely,

*** SUBJECT TO APPROVAL BY DLANC BOARD OF DIRECTORS ON DEC 12, 2023 ***

Claudia Oliveira
President,
DLANC

Samir Bitar
Chair,
DLANC Planning & Land Use Committee

Cc: Kevin De León, Councilmember, Council District 14
City Planner, City of Los Angeles