

# CITY OF LOS ANGELES

CALIFORNIA



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## DOWNTOWN LOS ANGELES NEIGHBORHOOD COUNCIL OFFICERS

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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-S3**

The Downtown Los Angeles Neighborhood Council (DLANC) has reviewed City Planning's REPORT ON POTENTIAL MODIFICATIONS TO THE IX1 USE DISTRICT TO BETTER FACILITATE COMMUNITY FACILITIES WITHIN PORTIONS OF THE SKID ROW NEIGHBORHOOD, AS PART OF THE DOWNTOWN COMMUNITY PLAN,, and would like to express our position on CF-22-0617-S3 as "For if Amended" per the following:

#### **Support for Community Facilities Incentives Within the IX1 Area**

DLANC fully supports the first proposed change to incentivize community facilities within the IX1 area. We believe that such incentives are crucial in making the neighborhood more habitable and improving the overall quality of life for its residents. These facilities will provide essential services and community spaces that are fundamental to the social fabric of the Skid Row neighborhood.

Recommendation: Adopt Councilmember de León's amendment to form a multi-tiered incentive-based system to incentivize the creation of community facilities, i.e., facilities intended to address infrastructure and social needs of Skid Row.

#### **Concerns Regarding the Expansion of Eligible Community Facilities to achieve Bonus FAR**

DLANC acknowledges the intentions behind expanding the statutory definition of Community Facilities to include high-demand retail and commercial services. However, we must express our reservations. Broadening the scope to encompass facilities like barber shops, pet stores, hair salons, banks, and pharmacies, while commercially viable, poses a significant risk of diverting crucial funding away from indispensable community spaces.

The current Zoning Code's narrow definition of eligible Community Facilities is designed to ensure that developments address the infrastructure and social needs of the neighborhood – needs that the market

typically fails to meet due to their lower revenue potential. Downtown Los Angeles, particularly within the Skid Row neighborhood, faces a severe shortage of essential facilities such as Senior Centers, Community Centers, Business Incubation & Service Centers, Day Care Facilities, and general community space. These venues are vital for the social and economic support of our residents and do not generate sufficient revenue to sustain themselves without the support of the Zoning Code's incentives.

We must not weaken the Zoning Code's emphasis on fostering these critical spaces. By diluting the incentive to fund and build community-oriented facilities, we risk not only exacerbating the gentrification process but also depriving our community of the very resources designed to bolster it. Therefore, DLANC advises against expanding the types of eligible community facilities under Article 9 of the Zoning Code and recommends maintaining the focus on incentivizing the development of facilities that serve the broader social and infrastructural needs of our neighborhood.

Recommendation: Do not adopt the proposed amendment to expand eligibility of community facilities within IX1 zoning districts.

#### **Establishment of an IX1 Community Benefits Fund**

DLANC endorses the third proposed change to establish an IX1 Community Benefits Fund. We believe that such a dedicated fund is critical in ensuring that collected fees are directly reinvested into the Skid Row neighborhood. This will facilitate the improvement of infrastructure, introduction of public art, and development of green spaces, all of which contribute positively to the community without the adverse effects associated with gentrification.

Recommendation: Create a separate Community Benefits Fund for Skid Row

In conclusion, DLANC supports changes that foster a more vibrant, equitable, and inclusive Skid Row while exercising caution to protect against unintended consequences that could arise from the expansion of community facilities. We recommend a focused and thoughtful approach to development that prioritizes the well-being and stability of existing residents.

We appreciate your consideration of our perspective and look forward to a continued partnership in the evolution of the Downtown Community Plan.

Sincerely,

**\* SUBJECT TO APPROVAL BY DLANC BOARD OF DIRECTORS ON DECEMBER 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