## CITY OF LOS ANGELES

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May 12, 2024

Re: Community Impact Statement on CF-22-0617-S5: Downtown Los Angeles Community Plan / Fashion District IX3 Zone / Housing Production

To Whom It May Concern:

At a regular public meeting on May 12, 2024, the Board of Directors of the Downtown Los Angeles Neighborhood Council ("DLANC") voted to provide the following comments below:

The Downtown Los Angeles Neighborhood Council submits this Community Impact Statement in support if amended of CF-22-0617-S5: Downtown Los Angeles Community Plan / Fashion District IX3 Zone / Housing Production

## Rezoning IX3 to Include Housing:

DLANC recognizes that introducing housing into IX3 district risks the displacement of crucial industrial operations that provide significant employment opportunities and contribute to the economic diversity of Downtown Los Angeles. However, the need to balance and create communities that can adapt to changing market conditions and also contribute to a vibrant urban environment is paramount to the long-term success of the Fashion District neighborhood. As such, the limitations on adaptive reuse hinder the ability for the Fashion District to fluctuate as needed to accommodate evolving market conditions and demands for either new uses or typologies in the community. In addition, the ever-growing need for affordable housing adjacent to high-quality transit and employment centers can only be achieved by creating additional housing stock. As such, Council must adopt recommendations that achieve both objectives for the preservation of employment centers and housing.

Therefore, DLANC **supports** the City Planning staff recommendations for "Productive Space" obligations in new residential constructions and the reduction of said obligations to 0.5 FAR as a reasonable compromise for the preservation of garment-related manufacturing uses.

## Mandating Preservation of Industrial Features in Active Garment Manufacturing Buildings:

Furthermore, DLANC **supports** the City Planning staff recommendation that it is ill-advised to mandate the preservation of freight elevators, loading docks, and loading bays within active garment manufacturing buildings for every structure within a IX3 Use District. Such a blanket policy does not account for the operational needs of individual businesses and imposes a one-size-fits-all solution to a nuanced issue. The arbitrary nature of this requirement could lead to unforeseen and significant logistical and financial burdens on the development of garment manufacturing, ancillary businesses, and housing production, thus potentially stifling the sector's growth and innovation.

In conclusion, while DLANC is committed to the development and enhancement of the Downtown area, it is our firm belief that such development should not come at the expense of established and vital industrial spaces.

We appreciate your attention to our concerns and stand ready to engage in further discussions to protect the economic and cultural fabric of our community.

Sincerely,

## \* SUBJECT TO APPROVAL BY DLANC BOARD OF DIRECTORS ON MAY 12, 2024\*

Claudia Oliveira Samir Bitar President, Chair,

DLANC Planning & Landuse Committee

Cc:

Planning & Land Use Management Committee, City Council (via email)

Council District 14 (via email)
Council District 1 (via email)

Department of City Planning (via email)