

**DTLA 2040 Plan  
DLANC 2040 Ad Hoc Committee  
Review Findings of Preliminary Plan – Dated 12/13/19**

**1. General Policy Guidelines**

**1.1 Land Use Policy**

**1.1.1 Adoption of New Zoning Code**

- a. DTLA 2040: The DTLA 2040 Plan adopts the new zoning code, re:code LA.
- b. DLANC Vision: The adoption of re:code LA is in line with the DLANC Vision Document's guiding principle: "Downtown needs its own rules." The sheer variety of uses and users necessitates an approach different from any part of the city to be able to manage its public realm, and uses, and mobility issues appropriately. (DLANC Vision p.51)
- c. **Potential actions:**
  - i. **Recommend comment: DLANC supports the adoption of the new proposed zoning code for Downtown LA.**
  - ii. **No action/no comment.**

**1.1.2 Increased Density**

- a. DTLA 2040: The DTLA 2040 Plan modifies land use zoning to increase density throughout downtown Los Angeles to accommodate an anticipated growth of an additional 125,000 residents by 2040.
- b. DLANC Vision: Increasing density is in line with the DLANC Vision Documents' guiding principle: "Accommodate 100,000 residents by 2025" and section 5b "Accommodate future growth through infill development." As it continues to grow, Downtown should prioritize housing in future developments for all incomes and generations. A critical mass of residents will ensure that amenities, attention, and opportunities will follow. (DLANC Vision p.51).
- c. **Potential actions:**
  - i. **Recommend comment: DLANC supports modifying land use zoning to increase density throughout downtown Los Angeles proposed by the DTLA 2040 Plan.**
  - ii. **No action/no comment.**

**1.1.3 Residential and Mixed-Use Zoning**

- a. DTLA 2040: The DTLA 2040 Plan modifies land use zoning to allow for residential and mixed-uses throughout most of downtown, except for the production district.
- b. DLANC Vision: Allowing for residential and mixed-use zoning throughout downtown is in line with the DLANC Vision guiding principle: "Challenge underlying land use constraints" and section 5a "Embed flexibility into the zoning code." Downtown should challenge policies (such as restrictive industrial zoning or inability to reuse historic buildings) and demonstrate that the need for land use flexibility is necessary and essential to the continuing success of Downtown. (DLANC Vision p.51).
- c. **Potential actions:**
  - i. **Recommend comment: DLANC supports modifying land use zoning to allow for mixed-uses throughout downtown Los Angeles proposed by the DTLA 2040 Plan.**
  - ii. **No action/no comment.**

#### 1.1.4 Manufacturing/Production District

- a. DTLA 2040: The DTLA 2040 Plan maintains a “production” district that retains industrial uses without residential zoning.
- b. DLANC Vision: Retaining a district designated for production is in line with the DLANC Vision guiding principle: “Keep a light on for manufacturing.” At some point, manufacturing (in the form of clean-tech or otherwise) may return to Los Angeles. When it does, Downtown needs to be prepared to accommodate it. (DLANC Vision p.51).
- c. **Potential actions:**
  - i. **Recommend comment: Based on the Ad-hoc committee’s research, in principle, DLANC supports the creation of a designated district retained for industrial uses proposed as the “Production” Land Use Designation in the DTLA 2040 Plan.**
  - ii. **No action/no comment.**

#### 1.1.5 Hybrid Industrial District

- a. DTLA 2040: The DTLA 2040 Plan creates a “Hybrid Industrial District” with mixed-use development in industrial areas.
- b. DLANC Vision: The Hybrid Industrial District is in line with the DLANC Vision guiding principle: “Develop Guidelines for Flex uses in the industrial district” and “Expand adaptive reuse for industrial properties.” Given the constraints of industrial uses, flexibility should be embedded into the zoning code to ensure that, if and when demand for industrial uses shifts, parcels and buildings will not remain vacant or underutilized. (DLANC Vision p. 54). The City should allow aging buildings in industrial zones by bright reuse opportunities as are provided in other zones. This approach will complement a “flex”-use approach and allow industrial areas (especially along the margins with commercial areas) to contribute in creating a 24-hour Downtown. (DLANC Vision p.55).
- c. **Potential actions:**
  - i. **Recommend comment: Based on the Ad-hoc committee’s research, in principle, DLANC supports Hybrid Industrial Land Use Designation proposed by the DTLA 2040 Plan.**
  - ii. **No action/no comment.**

#### 1.1.6 Transit Oriented Land Use

- a. DTLA 2040: The DTLA 2040 Plan provides for the highest land use density near transit lines. The highest densities are in the land use designation identified as “Transit Core.”
- b. DLANC Vision: Concentrating the highest densities near transit is in line with the DLANC Vision section 5c: “Transit networks should serve as the framework for future smart-growth development.” (DLANC Vision p.57). Since Downtown is at the confluence of many transit lines, it is better situated than most others to become the model for smart growth development in the region.
- c. **Potential actions:**
  - i. **Recommend comment: Based on the Ad-hoc committee’s research, in principle, DLANC supports concentrating the highest land use densities near transit lines as proposed by the DTLA 2040 Plan to promote Transit-Oriented-Land-Uses.**
  - ii. **No action/no comment.**

## 1.2 Mobility Policy

### 1.2.1 Complete Streets

- a. DTLA 2040: The DTLA 2040 Plan seeks to expand pedestrian oriented streets/prioritize pedestrian safety, expand transit, expand bike infrastructure, discourage over-parking, manage/price parking, eliminate 1-way streets.
- b. DLANC Vision: The concentration of the highest densities and FARs near transit is in line with the DLANC Vision section 5c: All Downtown streets should be complete streets. “All streets throughout Downtown should be safe, well-balanced and usable by everyone -- pedestrians, bicyclists, motorists, and transit riders. To make them so, the right street infrastructure improvements must be made, in addition to operations and maintenance, e.g., sidewalks, bike lanes, bus lanes, pedestrian crossings, curb extensions, transit stops, etc.” (DLANC Vision p.61).
- c. **Potential actions:**
  - i. **Recommend comment: DLANC supports land use strategies outlined by the DTLA 2040 plan that enhance and contribute to the creation of complete and safe streets.**
  - ii. **No action/no comment.**

### 1.2.2 Improved Connectivity

- a. DTLA 2040: The DTLA 2040 plan seeks to improve connectivity – paseos, 5th Street extension, break-up large blocks. The mobility Plan 2035 targets specific improvements.
- b. DLANC Vision: Downtown neighborhoods, districts, and destinations should be better connected and accessible. “Although Downtown is the hub of regional transit networks, the transit linkages between Downtown neighborhoods are insufficient to make navigating Downtown (and using multi-modal transit) pleasant for residents, workers and visitors. Whether by bike, bus, or rail, all transportation networks should be expanded across all of Downtown, not just regional destinations (e.g., Union Station and 7th/Metro Station).” (DLANC Vision p.61).
- c. **Potential actions:**
  - i. **Recommend comment: DLANC supports the expansion of transit and active transportation facilities throughout downtown and land use strategies that enhance to the improvements.**
  - ii. **No action/no comment.**

### 1.2.3 Transit Circulator Service

- a. DTLA 2040: The DTLA 2040 plan seeks to Extend nighttime/weekend transit service, expand to southeastern areas. The Mobility Plan 2035 targets specific improvements.
- b. DLANC Vision: “Downtown needs its own short hop transit service separate from Metro and DASH. Neither Metro nor LADOT provide enough service for all Downtown. If the Downtown DASH bus network cannot be improved, Los Angeles Streetcar, Inc. (or other entity) should expand its mission to become the dedicated transit provider for Downtown, offering frequent and convenient service 7-days a week (including evening and nighttime service) throughout all of Downtown’s neighborhoods and districts.” (DLANC Vision p. 61).
- c. **Potential actions:**
  - i. **Recommend comment: DLANC supports the development of a local surface-running, fixed guideway transit circulator to serve all districts of downtown.**
  - ii. **No action/no comment**

#### 1.2.4 Parking Policy

- a. DTLA 2040: The DTLA 2040 plan proposes to eliminate parking minimum requirements from zoning code throughout downtown.
- b. DLANC Vision: The DLANC Vision document includes a vision to manage parking to control traffic.
  - i. View 1: Elimination of parking minimums can make it easier to reconvert small apartment buildings that would otherwise require costly parking facilities. Additionally, elimination of parking minimums can reduce parking supply and manages traffic congestion by incentivizing transit usage and disincentivizing auto-commuting
  - ii. View 2: Elimination of parking minimums can make it more difficult for residents and patrons for businesses to park.
- c. **Potential actions:**
  - i. **Recommend comment: DLANC supports elimination of parking minimums in downtown LA.**
  - ii. **No action/no comment**

#### 1.3 Public Realm and Open Space Policy

##### 1.3.1 Pedestrian Experience

- a. DTLA 2040: Prioritize and expand pedestrian safety tools such as leading pedestrian intervals, bulb outs, scramble crosswalks, and no right turns on red.
- b. DLANC Vision: "The pedestrian comes first (Identifies non-walkable areas and locations for improvements). The pedestrian experience is the predominant experience in Downtown. The design and upkeep of Downtown's public realm should provide a safe, comfortable, attractive, and easily navigable environment for all pedestrians. (DLANC Vision p. 75).
- c. **Potential actions:**
  - i. **Recommend comment: DLANC supports expanding pedestrian safety tools such as leading pedestrian intervals, bulb outs, scramble crosswalks, and no right turns on red.**
  - ii. **No action/no comment**

##### 1.3.2 Open Space linkages

- a. DTLA 2040: Create Linkage between Districts. Identifies alleys and dead-end streets for potential open space.
- b. DLANC Vision: "Reclaim what the automobile has taken. Opportunities to expand the areas for pedestrian or transit activity exist in spaces that more recently have catered to the automobile. Alleys, dead-ends, and odd-angle intersections, for example, are often overlooked or neglected spaces, but can be reclaimed as more usable, public spaces." (DLANC Vision p. 75).
- c. **Potential actions:**
  - i. **Recommend comment: DLANC supports creating linkages between districts, including tools such as identifying alleys and dead-end streets for potential open space.**
  - ii. **No action/no comment**

### 1.3.3 Equitable Access to Open Space

- a. DTLA 2040: Identifies public realm opportunities. Implement a priority benefits system that balances growth and delivers neighborhood amenities. Encourage the development of nontraditional open spaces.
- b. DLANC Vision: The City should prioritize opportunity sites for open space. Give everyone in downtown equal access to open space. Creative solutions are possible (in land acquisition, design, funding, operations, and management) to create more public open space throughout Downtown, especially for areas that are currently under-served. All Downtown users (residents, workers, and visitors) should be no more than a 10-minute walk from a public park that is sized proportionately to the number of users within the 10-minute walk.
- c. **Potential actions:**
  - i. **Recommend Comment: DLANC supports creating new public open spaces and neighborhood amenities throughout downtown, especially for the areas that are under-served.**
  - ii. **No action/no comment**

### 1.3.4 Private Developer Contributions to Open Space

- a. DTLA 2040: Expand the TFAR system of growth and public benefits.
- b. DLANC Vision: "Private developments should provide public benefits that contribute to the public realm" Private developers should incorporate publicly-accessible open space (parks, plazas, paseos, dog runs, and programmed alleyways) into their developments. The benefits are two-fold: improvements add value to their developments while enhancing the public realm for all of Downtown. An effort must be made to identify why many developers resist it, and how more publicly-accessible open space can be incentivized." (DLANC Vision p. 75).
- c. **Potential actions:**
  - i. **Recommend Comment: DLANC supports the expansion of the TFAR system to increase the funds collected by developers specifically to provide more open space in downtown.**
  - ii. **No action/no comment**

## 1.4 Community Benefits

### 1.4.1 Affordable Housing – On-Site Requirement vs. In-Lieu Fee

- a. DTLA 2040: The DTLA 2040 plan proposes to use a 3-tiered system, providing various affordability levels, modeled on the state density bonus. Developers can pay an in-lieu fee instead of providing affordable units on-site.
- b. DLANC Discussion:
  - i. **On-Site affordable housing requirement**
    - Pro
      1. Aims to Provide on-site affordable housing keeps a mix in the area
      2. Closest thing to inclusionary zoning possible with current policy
    - Con
      1. Market rate Developers don't want to do it
      2. Doesn't guarantee affordable units will be built
      3. Few developers would go for the bonus
      4. Boutique developers- disincentivizes increasing density

ii. **In-lieu fee**

- Pro
  1. Provides money to affordable housing developers.
  2. More attractive option for small developments that cannot accommodate on-site affordable housing.
- Con
  1. Can contribute to class segregation
  2. Can contribute to a delay in delivering units
  3. Can make it harder to track where the funds are going. (Money goes into a trust fund.)

c. **Potential Actions:**

- i. **Recommend comment: DLANC supports the DTLA 2040 plan's element that in-lieu fee funds area committed to the downtown trust fund. (not just a general trust fund that can be used in other parts of the city.)**
- ii. **Recommend comment: DLANC requests to requiring some element of community benefits for all developments, providing incentives, in addition to linkage fees, including the Level 2 tier Community Benefits. (Increase base community benefits for all developments.)**
- iii. **No action/no comment.**

**1.4.2 In-Lieu Fee Requirement**

a. DLANC Discussion: Variable In-Lieu Fee by Land Value

- i. View 1: In-lieu fees should be greater in more expensive areas than less expensive areas. (This means developments built in higher value neighborhoods would pay a higher in-lieu fee than developments being built in lower land value neighborhoods.)
- ii. View 2: In-lieu fees should be greater in less expensive areas than more expensive areas. (With the goal of incentivizing denser development in areas with lower land value.)
- iii. View 3: It is not legally possible to enforce different in-lieu fee requirements to developments based on the existing land value of the adjacent land. These types of fees can legally only be applied evenly.

b. **Potential actions:**

- i. **Recommend comment: DLANC requests in-lieu fees to be greater in more for developments in areas with higher land values than in areas with lower land values.**
- ii. **Recommend comment: DLANC requests in-lieu fees to be greater in more for developments in areas with lower land values than in areas with higher land values.**
- iii. **No action/no comment.**

**1.4.3 TFAR Funds**

a. **DTLA 2040:**

- i. TFAR currently generates a lot of money for affordable housing. The new program appears to divert funds from TFAR. How will this affect things that were previous funded with TFAR funds?
- ii. In general, has the city thought about the unintended consequences or risks of losing out on funds that would have previously been used towards community benefits, including affordable housing, etc?

- iii. Is the net result from all of the policy changes going to be an increase in community benefits, affordable housing etc?
- b. **Potential actions:**
  - i. **Recommend comment: DLANC requests the city perform a planning study to investigate any net loss in the overall funds collected to produce affordable housing and/or a reduction in affordable housing production.**
  - ii. **No action/no comment.**

## **2. Land Use Designation Comments**

### **2.1 Historic Core**

#### **2.1.1 Transit Core area east of Pershing Square along Hill Street between 3rd and 7th streets.**

- a. DTLA2040: The parcels along South Hills Street between 3rd Street and 7th Street are designated as Transit Core.
- b. DLANC: The parcels in these locations are within DLANC's Historic Core district. The Land Use Designation description for Traditional Core better fits the character of these locations.
- c. **Potential actions:**
  - i. **Recommend Comment: DLANC request to change the Land Use Designation for South Hills Street between 3rd Street and 7th Street, currently designation at "Transit Core" to Traditional Core.**
  - ii. **Recommend Comment: DLANC request to change the Land Use Designation for South Hills Street between 3rd Street and 7th Street, currently designation at "Transit Core" to Traditional Core, but with FAR and height limits to match the Transit Core Land Use Designation.**
  - iii. **No action/no comment**

#### **2.1.2 Traditional Core Area on Broadway and Spring Street between 4th and 7th Streets.**

- a. DTLA2040: The parcels along Broadway and Spring Street between 4th and 7th Streets are currently designated as Traditional Core with a base max FAR of 6:1 and Bonus max FAR of 8.5:1.
- b. DLANC:
  - i. View 1: Support DTLA2040 FAR and height limits in Traditional core as proposed, retaining a lower max height in the center of the historic core along Broadway and Spring.
  - ii. View 2: Increase the Bonus Max FAR and building heights of the Traditional core land use designation to match that of the Transit Core.
- c. **Potential actions:**
  - i. **Recommend Comment: DLANC requests to increase the FAR and height limits on Broadway and Spring Street between 4th and 7th Streets to match Transit Core, but retain Land Use Designation of Traditional Core.**
  - ii. **Recommend Comment: DLANC requests to increase the FAR and height limits for all areas identified in Traditional Core to match Transit Core, but retain Land Use Designation of Traditional Core.**
  - iii. **No action/no comment**

## 2.2 Central City East

### 2.2.1 Market Rate Housing in Community Centers Land Use Designation

- a. DTLA 2040: The DTLA 2040 plan proposes no market housing in the district from 5th Street to 7th Street between San Pedro Street to Central Avenue.
- b. DLANC Views
  - i. View 1: Support exclusion or market rate housing in community centers land use designation. The provision of a district that only allows affordable housing will designate an area to be reserved for affordable housing with the hope of attracting affordable housing developments.
  - ii. View 2: Reject exclusion of market rate housing in any land use designation in downtown. The provision of a district that only allows affordable housing will perpetuate class division by concentrating low income residents. Restricting market rate housing will not ensure affordable housing is built. It will likely result in the opposite effect than desired.
  - iii. View 3: Use a mechanism to allow limited market development so as to achieve balanced/complete community neighborhoods (TBD) Propose to allow for limited market rate housing with review by the neighborhood council and city planning. Inclusionary zoning- provide 80-90% affordable but allows for limited market rate to bring in some level of economic development. If inclusionary zoning is not allowed, then recommend doing a study for inclusionary zoning study.
- c. **Potential Actions:**
  - i. **Recommend Comment: DLANC support exclusion of market rate housing in community centers land use designation.**
  - ii. **Recommend Comment: DLANC does not support exclusion of market rate housing in any land use designation in downtown.**
  - iii. **Recommend Comment: DLANC request the city perform a planning study to use zoning mechanisms that require a percentage of affordable housing in all neighborhoods so as not to concentrate affordable housing to a single area.**
  - iv. **No action/no comment.**

### 2.2.2 Community Centers Land Use Designation in Central City East

- a. DTLA 2040: The DTLA 2040 plan shows several different land use designations in the skid row area, including Community Centers, Villages, Markets, and Hybrid Industrial.
- b. DLANC Views:
  - i. View 1: Expand community centers land use designation to the skid row's definition of skid row, 7th to 3rd/Main to Alameda- from HUD from 1970s.
  - ii. View 2: Approve the community center boundaries as shown in the plan.
- c. **Potential Actions:**
  - i. **Recommend Comment: DLANC requests to expand the land use designation of community centers to the boundary of 7th to 3rd/Main to Alameda**
  - ii. **Recommend Comment: DLANC supports the land use designations in Central City East as proposed.**
  - iii. **No action/no comment**

## 2.3 Fashion District

### 2.3.1 Restrictive Minimum Unit Sizes

- a. DTLA2040: The DTLA 2040 plan restricts minimum unit sizes to 1,000 SF.
- b. DLANC: Large minimum unit sizes restricts potential residents to only the highest of income earners, which creates class segregation.
- c. **Potential actions:**
  - i. **Recommended Comment: DLANC request to reject the minimum unit size of 1,000 SF. Instead, provide a range of unit sizes to attract all income levels.**
  - ii. **No action/no comment**

### 2.3.2 Production segment along Olympic Boulevard

- a. DTLA2040: The parcels along Olympic Boulevard, between Central Avenue and I-10, are designated both Markets and Production. The parcels on the north side of Olympic Boulevard are designated Markets, while the parcels on the south side of Olympic are designated Production.
- b. DLANC: Recommend making the parcels on the south side of Olympic Markets, between Central and I-10- creating uniform corridor with potential for live/work on both side of street. (Match FARs on other side of street)
- c. **Potential actions:**
  - i. **Recommend Comment: DLANC request to change the Land Use Designation for the parcels along the south side of Olympic from Production to Markets, to create a uniform corridor.**
  - ii. **No action/no comment**

## 2.4 South Park

### 2.4.1 Flower Street and Hope Street Between 8th Street and I-10

- a. DTLA 2040: The Base max FAR on Flower Street and Hope Street between 8th Street and I-10 is 7:1.
- b. DLANC: Increase Base max FAR from 7:1 to 9:1 to match FARs along Figueroa – justification- should be able to build to highest FARs on both sides of street along transit lines.
- c. **Potential Actions:**
  - i. **Recommend Comment: DLANC requests to increase the base max FAR from 7:1 to 9:1 on Flower Street and Hope Street, between 8th Street and I-10.**
  - ii. **No action/no comment**

### 2.4.2 Grand Avenue Santee Street Between Pico Boulevard to I-10

- a. DTLA 2040: Base MAX FAR – 7:1 and Bonus Max FAR is 13:1
- b. DLANC: Increase Base max FAR from 7:1. Justification- should match adjacent streets.
- c. **Potential Action Items**
  - i. **Provide Comment: DLANC requests to increase base max FAR and Bonus Max FAR to match adjacent streets on Flower Street and Hope Street, between 8th Street and I-10.**
  - ii. **No action/no comment**

## **2.5 Civic Center/Bunker Hill**

### **2.5.1 Community Center designation at N Fremont and W Temple Street**

- a. DTLA 2040: Area designated as “Community Center” along N Fremont Ave and West Temple immediately adjacent to the 110 Freeway south of the 101 Freeway.
- b. DLANC: All other land uses similarly situated along the 110 Freeway south of the 101 Freeway are designated at Transit Core Land Use designation with higher allowable FAR.
- c. Potential Action Items
  - i. **Provide Comment: DLANC requests to change the Land Use Designation at N Fremont Ave and W Temple from Community Center to Transit Core and increase the allowable FAR to match the Transit Core Land Use Designation.**
  - ii. **No action/no comment**