

- DTLA 2040 -

Neighborhood Profile: Historic Core

Each week, we will highlight an area with distinct zoning characteristics contained in [DTLA 2040](#), which is the community plan for Downtown that will establish the blueprint for new development for the next 20 years. DTLA 2040 is currently underway and City Planning's next project milestone is the release of the Draft EIR, expected in spring 2020.

This week we are highlighting the **Historic Core**, an area generally bounded by Hill Street to the west, 4th Street to the north, Maple Avenue to the east, and 11th Street to the south (note: these boundaries roughly align with the zoning for the area and are not contiguous with the boundaries of the Historic Core Business Improvement District).

DTLA 2040 is the first community plan to implement the City's new form-based code which means all new zoning is organized in the following manner: **[Form-Frontage-Standards]** **[Use-Density]** **[Overlay]**.

- **Form** directly relates to the allowable building size.
- **Frontage** dictates how a building will appear when viewed from the street.
- **Standards** reflect if the area is auto or pedestrian-orientated.
- **Use** controls what type of activity inside the building is allowed.
- **Density** governs how many homes can be built within the building envelope.
- **Overlay** is a catch-all that regulates anything beyond the zoning code. In the case for DTLA 2040, the overlay provision implements the Community Benefits Program, Downtown Design Guidelines and existing area focused overlays.

As proposed in DTLA 2040, the **Historic Core** is primarily characterized by the following zoning:

[HUM1-CHC1-5] **[XE1-FA]** **[CPIO]**

[High-Unspecified-Medium 1, Historic Core 1, District 5] [Commercial-Mixed Entertainment 1, Limited by Floor Area]

[PLM2-CHC1-5] **[XE1-FA]** **[CPIO]**

[Medium Plus-Limited-Medium 2, Historic Core 1, District 5] [Commercial-Mixed Entertainment 1, Limited by Floor Area]

The proposed zoning approach for the Historic Core is to impose strict areawide design standards using the CHC1 frontage district and differentiate areas north and south of 7th Street by building form and height, while also concentrating entertainment uses along Broadway and neighborhood- and community-oriented uses on the surrounding blocks.

The CHC1 frontage district applies to the first 12 stories of a building and requires 16-foot ground-floor heights and 10-foot upper-floor heights. It includes highly specific requirements such as a base-middle-top articulation, horizontal and vertical bands, a grand entryway, a flat roof, and building materials that mimic the existing stock (i.e., brick, stone, concrete, metal, glazed tile). It also prohibits balconies and vinyl and horizontal sliding windows.

The area north of 7th Street is predominantly zoned for the PLM2 form district, which allows a 12-story base building height and 6:1 base FAR, and a 15-story max building height and 8.5:1 FAR max through the Community Benefits System. It also requires buildings to setback a minimum of 10 feet from the street wall at the building's 12th story and imposes a 6-story minimum building height. The area south of 7th Street is primarily zoned for the HUM1 form district, which allows a 6:1 base FAR and a 13:1 FAR max through the Community Benefits System. It does not restrict maximum building heights, but it does impose a 10-story minimum building height and buildings must setback a minimum of 10 feet from the street wall at the building's 12th story.

Broadway is zoned for the XE1 use district, which allows for a wide range of commercial and residential uses and is intended to support activities that cater to tourism and entertainment. The XE1 district allows on-site alcohol sales by-right, provided that a tenant has received approval from the State's Alcohol Beverage Control agency. The areas east of Broadway along Spring and Main Streets are primarily zoned for the XN1 use district, which is intended to support the clustering of commercial, cultural, entertainment and institutional uses that cater to immediately surrounding neighborhoods. The XN1 use district limits ground-floor commercial tenant sizes to a maximum of 5,000 square feet and hotels to 49 keys. Both the XN1 and XE1 use districts allow K-12 schools only with a Conditional Use Permit.

Like the rest of DTLA, above-grade parking is counted towards project FAR in the Historic Core.

**Please note not all parcels within the Historic Core are this proposed zoning. To review parcel by parcel zoning designations as proposed by DTLA 2040 please click [here](#).*

CCA has several concerns about the proposed zoning for the Historic Core, particularly that it is extremely rigid which risks inhibiting both innovative design and development feasibility. We believe the CHC1 frontage district is far too prescriptive in imposing such requirements like flat roofs and specified building materiality, which may limit creative and compelling architectural design. Additionally, we do not see a strong rationale for prohibiting balconies -- which often provide a means for projects to satisfy open space requirements and are desirable features for residents -- or vinyl and sliding windows.

We also do not believe it's appropriate to have greater restrictions on FAR or building heights north of 7th Street than south of 7th Street. The areas north of 7th Street are closer to transit so limiting new development is not aligned with furthering a transit-oriented DTLA.

Well-designed 35-story buildings like Perla at 4th Street and Broadway are under construction, but the proposed zoning under DTLA 2040 would limit buildings to 12-15 stories and therefore make projects like Perla impossible. Additionally, wood construction generally can only be built up to 8 stories, and concrete and steel construction is not economical unless it is a minimum of approximately 20 stories. This means that the 12- to 15-story height limit acts more like an 8-story height limit in practice, which further constrains the potential for new development and new housing. Moreover, we believe that requirements like setbacks at certain heights can accomplish quality urban design goals without greatly restricting development like building height limits.

Similarly, we also do not believe that minimum building height requirements are necessary or productive. We want to see more high-rise development in DTLA, but don't believe that it's necessary to effectively prohibit 5- to 7-story developments that may be financially feasible and would add to DTLA's housing stock. Minimum building heights may also decrease the viability of schools, daycare and other neighborhood-serving uses that generally require 1- or 2-story buildings.

We believe that K-12 schools in the XE1 and XN1 use districts should be allowed by-right and not be required to obtain a CUP. The Historic Core is a major residential neighborhood of DTLA and would greatly benefit from community resources like schools within walking distance to continue to grow sustainably into the future. Additionally, schools are considered a Tier 2 public benefit within the Community Benefits System, and the City should therefore make provision of schools simple and easy, not impose additional approval processes.

There is also no apparent rationale for limiting commercial establishments to 5,000 SF and hotels to 49 keys in the XN1 use district. The intent of these limits seems to be to encourage smaller businesses, but limiting their physical footprint does little to curate their business size or ownership, and can instead prevent the siting of desirable tenants like grocery stores that would serve the neighborhood but generally seek slightly larger contiguous spaces. Ultimately, limiting establishment size on this basis is arbitrary, does not speak to the unique needs that individual businesses will have and may limit the potential for commercial tenants that would benefit the area.

Lastly, we also remain focused on the impact of counting above-grade parking towards project FAR as a major factor that will increase the cost of producing new housing and entrepreneurial uses. It is one of CCA's primary advocacy objectives for DTLA 2040 to maximize opportunities for a jobs/housing balance and we will continue to evaluate the plan through that lens. We believe that the plan should at least exempt from project FAR above-ground parking that meets certain design standards, including if it is wrapped with active uses, mechanically ventilated or is convertible for other uses in the future.