

- DTLA 2040 -

Neighborhood Profile: Industrial District

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 **Industrial District**, an area generally bounded by San Pedro Street to the west, 4th Street to the north, Alameda Street to the east and the 10 Freeway to the south (note: these boundaries roughly align with the zoning for the area and are not contiguous with the boundaries of the Industrial District 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 **Industrial District** is primarily characterized by the following zoning:

[MLM2-G1-5] [IX1-FA] [CPIO]

[Medium-Limited Medium 2, General 1, District 5] [Industrial Mixed 1, Limited by Floor Area]

[MUM1-WH1-5] [IX2-FA]

[Medium-Unspecified-Medium 1, Warehouse, District 5] [Industrial Mixed 2, Limited by Floor Area]

[LUF1-WH1-6] [MR1-N]

[Low-Unspecified-Full 1, Warehouse, District 6] [Industrial Restricted, Not Permitted]

The proposed zoning approach for the Industrial District is to generally allow more flexibility for land uses and building scales in the northern portion above 7th Street, and increasingly restrict use and scale in the portions below 7th Street with the areas south of Olympic Boulevard being the most restrictive.

The area north of 7th Street is largely characterized by the MLM2 form district and the IX1 use district. MLM2 permits a 20-story base building height and 3:1 base FAR, and a 24-story max building height and 6:1 FAR max through the Community Benefits System. IX1 allows light industrial uses, office, research and development activity as well as residential uses, but limits housing exclusively to 100 percent rent-restricted affordable housing. IX1 also requires schools and daycares to obtain a Conditional Use Permit (CUP), and daycares must primarily serve workers in the nearby area. IX1 allows hotels of any size by-right.

The area between 7th Street and Olympic Boulevard is characterized by the MUM1 form district and IX2 use district. MUM1 allows a 4.5:1 FAR max and does not restrict building heights. IX2 also allows a wide range of commercial uses and limits residential uses to Joint Living and Work Quarters. Like IX1, schools and daycares must receive a CUP, and daycares must primarily serve workers in the nearby area. Hotels are not allowed in IX2.

Lastly, the area south of Olympic Boulevard is predominantly characterized by the LUF1 form district and the MR1 use district. LUF1 allows a 3:1 FAR max and does not restrict building heights. MR1 allows heavy commercial and light industrial uses as well as a limited amount of commercial activity, intended to promote employment, goods movement and warehousing. MR1 does not allow housing, hotels or K-12 schools, but daycares are allowed with a CUP but must primarily serve workers in the nearby area.

Like the rest of DTLA above-grade parking is counted towards project FAR in the Industrial District.

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

CCA has several significant concerns about the proposed zoning for the Industrial District. We are concerned about the limitations on new housing, especially the proposed ban on market rate housing, as well as the broad imposition of industrial zoning and restrictions on other uses that are vital to the future of DTLA like schools and daycares.

The intent of banning market rate housing in the area from 5th to 7th Streets and San Pedro Street to Central Avenue may be to preserve existing affordable housing and single room occupancy hotels, but it is unnecessary given covenants and the Residential Hotel Conversion and Demolition Ordinance. This area has the largest concentration of unsheltered homeless people in the nation. It is an area of extreme poverty and need. Banning market rate housing would further concentrate poverty in this area of Downtown and run counter to stated DTLA 2040 plan goals of inclusive and diverse neighborhoods.

To date, there are no market rate developments, built or proposed, in this area. Imposing this provision would only freeze the current conditions and further a failed policy of containment. We believe this policy also directly conflicts with the federal mandate to Affirmatively Further Fair Housing (AFFH). Affordable housing is an important part of DTLA 2040, and it should be throughout the plan area. CCA strongly supports housing opportunities for all incomes across Downtown as the primary tool to address the complicated and extensive challenges of homelessness and poverty in our city. DTLA 2040 should foster the economic integration and connection of Downtown's neighborhoods. However as currently proposed, it reinforces patterns of exclusion.

Additionally, we are very concerned that the proposed rigid industrial zoning is backward-looking and freezes this underutilized area in time. We believe the zoning should be more dynamic and look towards the future by accommodating a wider range of uses such as housing, commercial and educational facilities.

DTLA's economic success over the past two decades has been defined by increased livability with much more housing, transit, open space and community serving amenities such as places to shop and eat. The success of Downtown has not been due to the preservation of industrial land. In fact, between 2002 to 2017, manufacturing jobs decreased by 64 percent while jobs in wholesale trade increased by only six percent within the Downtown Community Plan area. As those jobs shrunk between 2002 to 2017, jobs have increased by 14 percent in information industries; 24 percent in professional, scientific and technology services; 44 percent in arts and entertainment; 72 percent in accommodation and food services and 119 percent in health care industries. We should continue to build on this success and inject new uses like housing, hotels and educational facilities into areas where jobs have declined, not perpetuate the decline of those areas by freezing the allowable land uses.

To this end, we believe that K-12 schools and daycares in these areas should be allowed by-right and not be required to obtain a CUP. LAUSD's Ninth Street Elementary School and Para Los Niños Charter School sit in the middle of the Industrial District and have operated successfully for several years, serving as an example that CUPs for these uses in this area are unnecessary and furthering the case that DTLA 2040 should enable the surrounding area to grow around these key community assets and not cut them off with industrial zoning. Daycares should also not be limited to primarily serving only workers in the area, but open to all DTLA residents as well. 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.

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.