

# - DTLA 2040 -

## Neighborhood Profiles

Each neighborhood profile highlights 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 released the *Draft EIR* along with updated zoning map and plan text in Summer 2020.

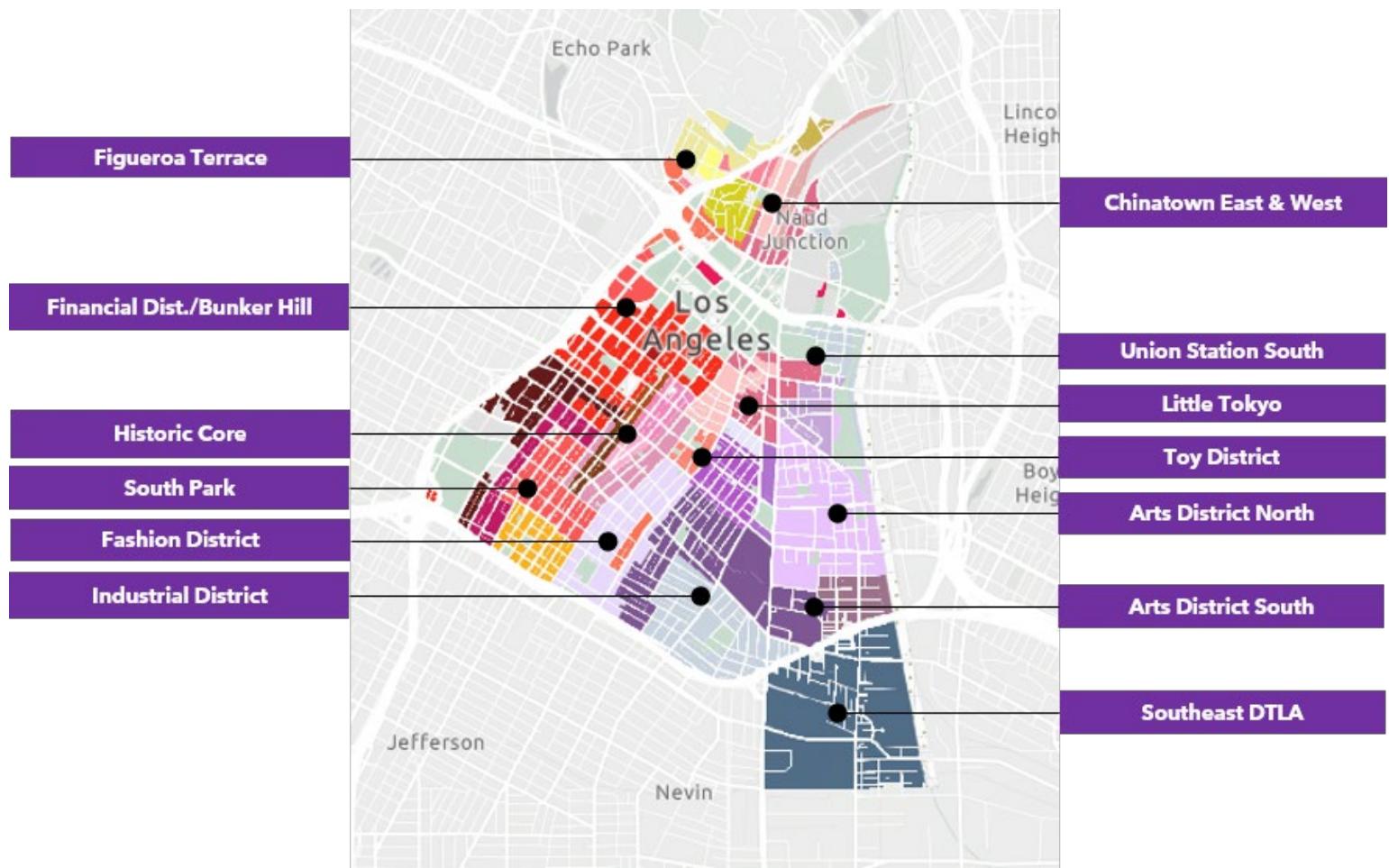
DTLA 2040 is the first community plan to implement the City's new form-based code which means all new zoning is organized in the following manner: **[Form-Frontage-Standards] [Use-Density] [Overlay]**.

- **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.

CCA profiled the following neighborhoods in DTLA 2040. Please note that these neighborhood profiles refer to generalized zoning for areas, and not all parcels within these neighborhoods may have the described zoning. To review parcel by parcel zoning designations as proposed by DTLA 2040, click [here](#).

- Arts District North
- Arts District South
- Chinatown East
- Chinatown West
- Fashion District
- Figueroa Terrace
- Financial District and Bunker Hill
- Historic Core
- Industrial District
- Little Tokyo
- South Park
- Southeast DTLA
- Toy District
- Union Station South

# DTLA 2040 Neighborhood Profile Reference Map



## Arts District North

**Arts District North** is an area approximately bounded by 1st Street, LA River, Violet Street and Alameda Street. **Arts District North** is primarily characterized by the following zoning:

[LLM1-CDFI-5] [IH2-FA] [CPIO]

[Low-Limited-Medium 1-Daylight Factory-District 5] [Industrial Mixed 2-Limited by Floor Area]

[MUB1-CDFI-5] [IH2-FA] [CPIO]

[Medium-Unspecified Broad 1- Daylight Factory-District 5] [Industrial Mixed 2-Limited by Floor Area]

The LLM1 form district generally applies to the area north of 4th Street and allows for a max FAR of 3:1 and a max building height of 10 stories. The MUB1 form district generally applies to the area south of 4th Street and allows for a max FAR of 6:1 and does not have building height limits.

The IH2 use district supports office and commercial uses, as well as research and development, wholesale and light industrial uses. IH2 limits hotels to 75 keys and daycare facilities and schools must seek a Conditional Use Permit (CUP) which requires approval by the City Planning Commission. It also allows for a limited number of live/work units and permanent supportive housing (PSH) but no other housing typologies. Construction of new live/work developments are required to have a minimum average unit size of 1,000 square feet. Except for PSH, IH2 also requires that all new structures be built entirely as Type I, II or IV construction, which largely precludes the use of wood materials. Building materials, type of windows and roof style are also severely limited by the Daylight Factory form district. For example, Daylight Factory requires flat roofs and prohibits balconies.

Like the rest of DTLA, under the proposed plan Arts District North does not have density limitations and above-grade parking is counted toward project FAR.

CCA is concerned about the restrictions on housing, design and construction types in this area. Amid our current housing crisis, limiting housing to live/work or PSH units and greatly reducing the ability to use wood construction is counterproductive and contrary to our goal of making DTLA the place for housing at all income levels. We believe this will result in exclusionary and economically stratified, not integrated, growth. Live/work units are more expensive to build than typical housing units and the requirements for high-cost construction materials coupled with counting above-grade parking toward project FAR will further increase the cost of housing. DTLA 2040 is seemingly the first community plan that has attempted to dictate construction types and we believe such a determination is out-of-scope for City Planning to mandate based on design preferences and should be left to building and safety codes.

We are also strong advocates for increased daycare and school options for DTLA and believe these uses should be encouraged. Instead, DTLA 2040 discourages these uses by requiring CUPs can be costly and arduous to process which creates barriers to entry and disincentivizes these uses. Requiring CUPs for these uses in this area also appears to be in conflict with the intended goals for the area, given that developments are incentivized to use the Community Benefits System to achieve additional development capacity, of which schools and daycares are included as priority public benefits. The community benefits program should work in tandem with the proposed zoning, however they are at odds in this case.

Additionally, limiting hotels to 75 keys is arbitrary as are many of the design requirements. We are concerned that collectively these requirements do not support an inclusive DTLA and are out of character with the vision for DTLA as a vibrant, 24/7, urban environment.

We also remain focused on the impact of counting above-grade parking towards project FAR as 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.

## Arts District South

**Arts District South** is an area approximately bounded by Violet Street, LA River, 10 Freeway and Alameda Street. Arts District South is primarily characterized by the following zoning:

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

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

[MLM1-CDF1-5] [IH2-FA] [CPIO]

[Medium-Limited-Medium 1- Daylight Factory-District 5] [Industrial Mixed Hybrid 2-Limited by Floor Area]

The MUM1 form district generally applies to the area west of Mateo Street and allows for a max FAR of 4.5:1 and unlimited building height. The IX2 use district is intended to accommodate light industrial uses, office space, and research and development activity. It also allows live/work units. This district also requires day care facilities and schools to obtain conditional use permits (CUPs), and day care facilities must serve local employees.

The MLM1 form district generally applies to the area east of Mateo Street and allows for a max FAR of 4.5:1 and limits buildings to 18 stories. The IH2 use district supports office and commercial uses, as well as research and development, wholesale and light industrial uses. IH2 limits hotels to 75 keys, and daycare facilities and schools must seek a CUP which requires approval by the City Planning Commission. It also allows for a limited number of live/work units and permanent supportive housing (PSH) but no other housing typologies. Construction of new live/work developments are required to have a minimum average unit size of 1,000 square feet. Except for PSH, IH2 also requires that all new structures be built entirely as Type I, II or IV construction, which largely precludes the use of wood materials. Building materials, type of windows, roof style is also severely limited by the Daylight Factory (CDF1) form district. For example, CDF1 requires flat roofs and prohibits balconies.

Like the rest of DTLA under the proposed plan Arts District South does not have density limitations and above-grade parking is counted toward project FAR.

Like our concerns with the proposed zoning for Arts District North, CCA takes issue with the restrictions on housing, design and construction types in this area. Amid our current housing crisis, limiting housing to live/work or PSH units and greatly reducing the ability to use wood construction is counterproductive and is contrary to our goal of making DTLA the place for housing at all income levels. We believe this will result in exclusionary and economically stratified, not integrated, growth. Live/work units are more expensive to build than typical housing units and the requirements for high-cost construction materials coupled with counting above-grade parking toward project FAR will further increase the cost of housing. DTLA 2040 is seemingly the first community plan that has attempted to dictate construction types and we believe such a determination is out-of-scope for City Planning to mandate based on design preferences and should be left to building and safety codes.

We are also strong advocates for increased daycare and school options for DTLA and believe these uses should be encouraged. Instead, DTLA 2040 discourages these uses by requiring CUPs that can be costly and arduous to process which creates barriers to entry and disincentivizes these uses. Requiring CUPs for these uses in this area also appears to be in conflict with the intended goals for the area, given that developments are incentivized to use the Community Benefits System to achieve additional development capacity, of which schools and daycares are included as priority public benefits. The community benefits program should work in tandem with the proposed zoning, however they are at odds in this case.

Additionally, limiting hotels to 75 keys is arbitrary, as are many of the design requirements. We are concerned that collectively these requirements do not support an inclusive DTLA and are out of character with the vision for DTLA as a vibrant, 24/7, urban environment.

We also remain focused on the impact of counting above-grade parking towards project FAR as 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.

## Chinatown East

**Chinatown East** is an area approximately bounded by Ord Street, Hill Street, N. Spring Street and LA State Historic Park. **Chinatown East** is primarily characterized by the following zoning:

[MLN1-SH2-5] [XN1-FA] [CPIO]

[Medium-Limited-Narrow 1, Shopfront 2, District 5] [Commercial-Mixed Neighborhood 1-Limited by Floor Area]

[PLM1-SH2-5] [XN1-FA] [CPIO]

[Medium-Plus-Limited-Medium 1, Shopfront 2, District 5] [Commercial-Mixed-Neighborhood 1-Limited by Floor Area]

The maximum FAR in areas covered by form district MLN1, including much of Hill Street and Broadway, is 6:1 and the max height is 5 stories. District PLM1 generally applies to the eastside of Broadway and Spring Street and allows a max base FAR of 6:1 and base height of 12 stories with the ability to achieve a max FAR of 8.5:1 and max height of 15 stories through the Community Benefits System. In general, this area allows for commercial use within a 5,000 square foot establishment size on the ground floor, as well as housing. Other use regulations in this area include: only restaurants are permitted alcohol licenses, hotels are limited to a maximum of 49 keys and K-12 educational facilities are only allowed through a conditional use permit.

Like the rest of DTLA, under the proposed plan, Chinatown East does not have density limitations and above-grade parking is counted toward project FAR.

CCA is concerned about the building height limits and restrictions on commercial tenants and schools in this area. Despite an allowable 6.0 FAR development capacity, the 5-story height limit greatly constrains the potential for new development and housing. Additionally, while some areas allow buildings up to 12-15 stories, 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 again reduces opportunity for new housing. There is no apparent rationale for limiting buildings to the prescribed heights or for limiting commercial establishments to 5,000 SF and hotels to 49 keys. We are also concerned that K-12 educational facilities -- which are needed in DTLA -- would be required to obtain a conditional use permit to operate in this area. Collectively, these requirements do not support an inclusive DTLA and are out of character with the vision for DTLA as a vibrant, 24/7, urban environment.

We 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 it is exacerbated by the building height limits in this area of Chinatown. It is one of CCA's primary advocacy objectives for DTLA 2040 to maximize opportunities for housing, including workforce housing, and we will continue to evaluate the plan through that lens.

## Chinatown West

**Chinatown West** is an area approximately bounded by Cesar E. Chavez Avenue, Hill Street, 110 Freeway and Bernard Street. **Chinatown West** is primarily characterized by the following zoning:

**[LLM2-G1-5] [XC1-FA] [CPIO]**  
**[Low-Limited-Medium 2, General 1, District 5] [Commercial-Mixed Community 1-Limited by Floor Area]**

The maximum FAR in this area is 3:1 and the maximum height is 8 stories. This area is zoned primarily for residential uses, but also allows for commercial uses that are generally restricted to 50,000 SF in size per tenant space. Hotels are limited to 149 guest rooms in this area.

Like the rest of DTLA, under the proposed plan, Chinatown West does not have density limitations and above-grade parking is counted toward project FAR. Additionally, above-grade integrated parking must be wrapped on the ground story and upper stories facing primary street. Upper stories for parking must also be adaptable for future uses.

CCA is concerned about the hotel limitation in this area. Limiting hotels to 149 rooms or less is arbitrary and does not speak to the unique needs that individual businesses will have.

In addition, CCA is concerned about the impact of counting above-grade parking towards project FAR. City Planning has removed all parking requirements in DTLA 2040 and is counting parking towards project FAR to encourage subterranean parking. However, we know that subterranean parking is very expensive and will further increase the cost of building housing in DTLA. It is one of CCA's primary advocacy objectives for DTLA 2040 to maximize opportunities for housing, including workforce housing, and we will continue to evaluate the plan through that lens.

## Fashion District

The **Fashion District** is an area generally bounded by Broadway to the west, 7th Street to the north, Stanford Avenue to the east and the 10 Freeway to the south. The **Fashion District** is primarily characterized by the following zoning:

[PUM1-G1-5] [IH1-FA] [CPIO]

[Medium-Plus-Unspecified-Medium 1, General, District 5] [Industrial-Mixed Hybrid 1, Limited by Floor Area]

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

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

The western edge of the Fashion District between Broadway and Santee Street shares similar zoning with the eastern edge of South Park, which is flexible and allows a range of housing types. However, the Fashion District east of Santee Street is largely zoned for hybrid-industrial and industrial-mixed uses which are restrictive, with the exception of City Market that sits in the middle of the Fashion District and is zoned for an array of mixed residential and commercial uses. In general, the City's proposed zoning approach for the Fashion District is to allow a wide mix of uses in the western portion, and impose gradually increasingly more restrictive industrial-oriented zoning eastward.

The PUM1 form district that makes up most of the Fashion District allows a 4:1 base FAR and 8:1 FAR max through the Community Benefits System, and the IH1 use district that applies to these areas is intended to promote a range of light industrial and commercial uses. It permits housing but with some limitations. Housing is allowed via adaptive reuse and new housing construction must be permanent supportive housing (PSH), live/work units with a minimum average size of 750 square feet, or general multifamily that is included in mixed-use developments that have a minimum amount of floor area (at least 100% of lot area) set aside for commercial uses like office or light industrial, but not retail (workspace area of live/work units is allowed to count towards this requirement). As an example of how conventional multifamily may be built in the Fashion District under this proposal, a building on a 10,000 square foot lot would need to include at least 10,000 square feet of floor area for office or light industrial uses. The IH1 use district also limits hotels to 149 keys, requires schools and daycares to receive Conditional Use Permits (CUPs). Daycares must primarily serve workers in the surrounding area.

The MUM1 form district that covers the eastern edge of the Fashion District, generally between San Pedro Street and Stanford Avenue, allows a 4.5:1 FAR max, and the IX2 use district is intended to accommodate light industrial uses, office space and research and development activity. New housing and hotels are not permitted. The same limitations on schools and daycares apply in this area as well.

Like the rest of DTLA, above-grade parking is counted towards project FAR in the Fashion District. There are no maximum building height limitations throughout the Fashion District.

CCA has significant concerns about the zoning approach for the Fashion District, particularly the restrictions on new housing and limitations on hotels, schools and daycares. Rather than apply the more dynamic and forward-looking zoning of the City Market site, the current zoning proposal treats City Market as an island and largely freezes the rest of the Fashion District in its current state and inhibits the area's growth. We believe that the City Market zoning and the zoning on the western edge of the Fashion District should be more broadly applied across the district to allow it to grow as a thriving mixed-use neighborhood.

Amid our current housing crisis, precluding housing in some areas and limiting housing primarily to live/work, PSH units or imposing requirements for the inclusion of non-residential floor area with new housing in other areas is counterproductive and is contrary to our goal of making DTLA the place for housing at all income levels. There is great uncertainty about future demand for office space and light industrial uses due to the pandemic and increased remote work. Additionally, office and light industrial uses typically have unique architectural and

design considerations that may not be compatible with the design needs of multifamily residential within the same developments. Given these complexities, we believe this will realistically result primarily in the development of live/work units in the Fashion District, and ultimately exclusionary and economically stratified, not integrated, growth. Live/work units are more expensive to build than typical housing units and the addition of counting above-grade parking toward project FAR will further increase the cost of housing. Additionally, as the Fashion Industry undergoes major changes and as employment shrinks, the future economic vitality of the neighborhood is dependent on welcoming new residents, and we therefore believe the zoning for this area should remove barriers to residential development.

We are strong advocates for increased daycare and school options for DTLA and believe these uses should be encouraged. Instead, the proposed use districts discourage these uses by requiring CUPs that can be costly and arduous to process, which creates barriers to entry and disincentivizes these uses. Requiring CUPs for these uses in this area also appears to be in conflict with the intended goals for the area, given that developments are incentivized to use the Community Benefits System to achieve additional development capacity, of which schools and daycares are included as priority public benefits. The community benefits program should work in tandem with the proposed zoning; however they are at odds in this case. Moreover, the requirement that daycares should primarily serve people working in the surrounding area is arbitrary. Daycares should be encouraged to serve residents as well, which will also foster a more inclusive community.

Additionally, limiting hotels to 149 keys or precluding new hotels altogether does not support an inclusive DTLA and are out of character with the vision for DTLA as a vibrant, 24/7, urban environment. Hotels are an important asset for DTLA, supporting tourism and increasing the tax base.

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.

## Figueroa Terrace

**Figueroa Terrace** is an area approximately bounded by Sunset Boulevard, Chavez Ravine Place, Lilac Terrace and Marview Avenue. **Figueroa Terrace** is primarily characterized by the following zoning:

**[LLN1-MU2-5] [RG1-FA] [CPIO]**  
**[Low-Limited-Narrow 1, Multi-Unit 2, District 5] [Residential General 1-Limited by Floor Area]**

The maximum FAR in this area is 3:1 and the max height is 8 stories. This area is primarily zoned for multi-unit residential uses and does not have density limitations. Above-grade parking is counted toward project FAR. Additionally, above-grade integrated parking must be wrapped on the ground story and upper stories facing the primary street. Upper stories for parking must also be adaptable for future uses.

CCA is concerned about the impact of counting above-grade parking towards project FAR, especially since this area is not readily served by transit so new development will likely still require parking to be feasible.

City Planning has removed all parking requirements in DTLA 2040 and is counting parking toward project FAR to encourage subterranean parking. However, we know that subterranean parking is very expensive and will further increase the cost of building housing in DTLA. It is one of CCA's primary advocacy objectives for DTLA 2040 to maximize opportunities for housing, including workforce housing, and we will continue to evaluate the plan through that lens.

## Financial District and Bunker Hill

The **Financial District and Bunker Hill** is an area generally bounded by the 110 Freeway to the west, 1st Street to the north, Hill Street to the east and 8th Street to the south. The **Financial District and Bunker Hill** are primarily characterized by the following zoning:

[HUB3-G1-5] [XG1-FA] [CPIO]

[High-Unspecified-Broad 3, General, District 5] [Commercial-Mixed General 1, Limited by Floor Area]

[HUB3-SH1-5] [XE1-FA] [CPIO]

[High-Unspecified-Broad 3, Shopfront 1, District 5] [Commercial-Mixed Entertainment 1, Limited by Floor Area]

The proposed zoning for the Financial District and Bunker Hill is flexible. The vast majority of the area is zoned with form district HUB3, which allows a 9:1 base FAR and 13:1 FAR max through the Community Benefits System, and use district XG1 which allows for a broad mix of uses. Parcels that front 7th Street and those south of 7th Street between the 110 Freeway and Hope Street are zoned with 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. K-12 schools are only permitted by Conditional Use Permit (CUP) in this area.

Like the rest of DTLA, above-grade parking is counted towards project FAR in the Financial District and Bunker Hill. There are no maximum building height limitations, but the HUB3 form district imposes a minimum building height of 10-stories.

CCA appreciates the largely flexible approach to the proposed zoning in the Financial District and Bunker Hill, but we have concerns about some provisions that appear arbitrary and may unduly hamper the ability for new development to meet the needs of DTLA's growing population.

We believe that K-12 schools in the XE1 use district should be allowed by-right and not be required to obtain a CUP. The Financial District and Bunker Hill are the employment centers of DTLA and would greatly benefit from community resources like schools within walking distance of jobs and residences to continue to grow sustainably into the future. Additionally, schools are considered a Tier 2 public benefit within the Community Benefits System. The City should therefore make the provision of schools simple and easy, not impose additional approval processes.

We also believe that minimum building heights, while well-intentioned, may have the unintended consequence of limiting near-term infill development. We want to see more high-rise development in DTLA, but don't believe that it's necessary to prohibit developments less than 10 stories 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 one- or two-story buildings.

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.

## Historic Core

The **Historic Core** is 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. The **Historic Core** is primarily characterized by the following zoning:

**[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 concentrating entertainment uses along Broadway with 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 vinyl and horizontal sliding windows.

The area 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.

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.

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 vinyl and sliding windows.

We also do not believe it's appropriate to have such severe restrictions on FAR or building heights in this area, especially it is transit- and job-rich so limiting new development is not aligned with furthering a transit-oriented and walkable DTLA. Well-designed 35-story buildings like Perla at 4<sup>th</sup> 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 high-rise development, which produces the most union jobs. 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.

## Industrial District

The **Industrial District** is 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. The **Industrial District** is primarily characterized by the following zoning:

[MUB2-G1-5] [IX1-FA] [CPIO]

[Medium-Unspecified Broad 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 MUB2 form district and the IX1 use district. MUB2 permits a 3:1 base FAR and 6:1 FAR max through the Community Benefits System, and does not restrict building height. 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.

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.

## Little Tokyo

**Little Tokyo** is an area generally bounded by Los Angeles Street to the west, Temple Street to the north, Alameda Street to the east and 4th Street to the south. **Little Tokyo** is primarily characterized by the following zoning:

[MLN1-SH2-5] [XN1-FA] [CPIO-O-CD0]

[Medium-Limited-Narrow 1, Shopfront 2, District 5] [Commercial Mixed Neighborhood 1, Limited by Floor Area]  
[Community Design Overlay]

[PUM2-SH2-5] [XC1-FA] [CPIO]

[Medium Plus-Unspecified-Medium 2, Shopfront 2, District 5] [Commercial-Mixed Community 1, Limited by Floor Area]

The proposed zoning approach for Little Tokyo is to limit building scale and land use where there are existing low-rise buildings such as along the northside of 1st Street and alleyways like Japanese Village Plaza Mall, while providing more development flexibility in all other areas of the neighborhood. There is also a community design overlay in much of this area.

The areas with existing low-rise development are largely characterized by the MLN1 form district and the XN1 use district. MLN1 permits a 6:1 FAR max and max building height of 5 stories. The XN1 use district is intended to support the clustering of commercial, cultural, entertainment and institutional uses that cater to immediately surrounding neighborhoods. XN1 limits ground-floor commercial tenant sizes to a maximum of 5,000 square feet and hotels to 49 keys, and also allows K-12 schools only with a Conditional Use Permit (CUP).

All other areas of Little Tokyo are primarily zoned with the PUM2 form district and XC1 use district. PUM2 allows a 6:1 base FAR and 8.5:1 FAR max through the Community Benefits System. It does not limit building height but requires a 10' minimum step-back at the 12th story. The XC1 use district allows for commercial uses generally up to 50,000 square feet per establishment on the ground floor, as well as a wide range of housing types. XC1 also limits hotels to 149 keys.

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

CCA is concerned about the building height limits and restrictions on commercial tenants, hotels and schools in this area.

Despite an allowable 6.0 FAR development capacity, the 5-story height limit in the MLN1 form district greatly constrains the potential for new development and housing. While the narrow alleyways may require some design consideration to allow light and air, this should be accomplished through setback and massing specifications, not a severe limit on building heights, especially in a transit-rich area. Likewise, there is no clear need to limit building heights along the north side of 1st Street or on the block between Los Angeles, 2nd, San Pedro and 3rd Streets.

We also believe that the limits on commercial establishments to 5,000 SF and hotels to 49 keys in the XN1 use district, or 50,000 SF and 149 keys in the XC1 use district are arbitrary. They may ultimately constrain opportunities for tenants that are desirable to locate in DTLA.

K-12 schools in the XN1 use district should be allowed by-right and not be required to obtain a CUP. Little Tokyo is an established residential neighborhood 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.

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.

## South Park

**South Park** is an area generally bounded by the 110 Freeway to the west, 8th Street to the north, Broadway to the east and the 10 Freeway to the south. **South Park** is primarily characterized by the following zoning:

[HUB3-G1-5] [XE1-FA] [CPIO]

[High-Unspecified-Broad 3, General, District 5] [Commercial-Mixed Entertainment 1, Limited by Floor Area]

[HUB2-SH1-5] [XC1-FA] [CPIO]

[High-Unspecified-Broad 2, Shopfront 1, District 5] [Commercial-Mixed Community 1, Limited by Floor Area]

[HUB1-G1-5] [XC1-FA] [CPIO]

[High-Unspecified-Broad 1, General, District 5] [Commercial-Mixed Community 1, Limited by Floor Area]

In general, the City's proposed zoning approach for South Park is to concentrate larger-scale and more intense development and uses closest to the Los Angeles Convention Center and STAPLES Center/LA LIVE, and taper off scale and intensity moving eastward toward the Fashion District and south of Pico Boulevard.

The Convention Center and STAPLES Center/LA LIVE is surrounded by the HUB 3 form district, which allows for a 9:1 base FAR and 13:1 FAR max through the Community Benefits System, and 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. K-12 schools are only permitted by Conditional Use Permit (CUP) in this area.

The area between Flower Street and Grand Avenue and North of Pico Boulevard is largely zoned with the HUB 2 form district, which allows for a 7:1 base FAR and 13:1 FAR max through the Community Benefits System, and the XC1 use district, which allows for commercial uses generally within a max 50,000 square foot establishment size on the ground floor, as well as a wide range of housing types. Hotels are limited to 149 keys. The area east of Grand Avenue and South of Pico Boulevard is predominantly zoned with the HUB 1 form district, which allows for a 6:1 base FAR and 10:1 FAR max through the Community Benefits System, and also is largely zoned with the XC1 use district.

Like the rest of DTLA, above-grade parking is counted towards project FAR in South Park. There are no maximum building height limitations, but the respective form districts do impose minimum building heights – HUB 3: 10-stories, HUB 2: 6-stories, and HUB 1: 4-stories.

The proposed zoning for South Park is flexible and permissive in comparison with proposed zoning for other areas of DTLA. However, CCA still has concerns about some provisions that appear arbitrary and may unduly hamper the ability for neighborhood development to meet the needs of its rapidly growing population.

We believe that there is no reason to limit ground-floor commercial establishments to 50,000 square feet or hotels to 149 keys. There are any number of large-format retailers like grocery or furniture stores that could be desirable tenants in South Park, and the 50,000 square foot limitation would unnecessarily limit these opportunities while providing no clear benefit otherwise. Additionally, hotels close to some of the city's highest-volume visitor destinations should not be capped at 149 rooms, especially as the city has a stated public objective of locating more hotel rooms within walking distance of the Convention Center.

We also believe that K-12 schools should be allowed by-right and not be required to obtain a CUP. South Park is DTLA's fastest growing residential area and needs 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.

We believe that minimum building heights, while well-intentioned, may have the unintended consequence of limiting near-term infill development. 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.

## Southeast DTLA

**Southeast DTLA** is an industrial area south of the 10 Freeway and north of the city of Vernon, approximately bounded by 10 Freeway, LA River, 25th Street and Alameda Street. **Southeast DTLA** is primarily characterized by the following zoning:

**[LUF1-WH1-6] [MH1-N]**  
**[Low-Unspecified-Full 1-Warehouse 1-District 6] [Heavy Industrial 1-Not Permitted]**

The LUF1 form district allows for a max of FAR of 3:1 and unlimited building height. The MH1 use district allows heavy commercial, light industrial, and heavy industrial uses as well as a limited amount of commercial activity. It does not allow for residential uses or K-12 schools.

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

We are very concerned that the proposed zoning for Southeast DTLA is static 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 into areas where jobs have declined, not perpetuate the decline of those areas by freezing the allowable land uses.

CCA is a strong advocate for an inclusive DTLA that includes housing for all income levels and provides neighborhood features like schools that will help attract and retain families over the long-term. We will continue to advocate for a DTLA 2040 plan that does not include areas zoned exclusively for industrial uses, and that these areas should instead provide more flexible zoning to allow them to gradually convert to other uses, including housing.

## Toy District

The **Toy District** is an area generally bounded by Los Angeles Street to the west, 3rd Street to the north, San Pedro Street to the east and 7th Street to the south. The **Toy District** is primarily characterized by the following zoning:

[MLN1-AL2-5] [XN1-FA] [CPIO]

[Medium-Limited-Narrow 1, Alley Shopfront 2, District 5] [Commercial Mixed Neighborhood 1, Limited by Floor Area]

[MUB2-SH1-5] [XC1-FA] [CPIO]

[Medium-Unspecified Broad 2, Shopfront 1, District 5] [Commercial-Mixed Community 1, Limited by Floor Area]

The proposed zoning approach for the Toy District is to limit building scale and land use, more strictly dictate urban design standards in the areas between 3rd and 5th Streets where there are narrow alleyways, and provide more flexibility between 5th and 7th Streets.

The area north of 5th Street is largely characterized by the MLN1 form district and the XN1 use district. MLN1 permits a 6:1 FAR max and max building height of 5 stories. The XN1 use district is intended to support the clustering of commercial, cultural, entertainment and institutional uses that cater to immediately surrounding neighborhoods. XN1 limits ground-floor commercial tenant sizes to a maximum of 5,000 square feet and hotels to 49 keys, and also allows K-12 schools only with a Conditional Use Permit (CUP). The AL2 frontage district also applies in this area and requires a storefront bay entryway, an alley-facing entrance and 16 ft ground-floor heights.

The area south of 5th Street is primarily zoned with the MUB2 form district and XC1 use district. MUB2 permits a 3:1 base FAR and 6:1 FAR max through the Community Benefits System, and does not restrict building height. The XC1 use district allows for commercial uses generally up to 50,000 square feet per establishment on the ground floor, as well as a wide range of housing types. XC1 also limits hotels to 149 keys.

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

CCA is concerned about the building height limits and restrictions on commercial tenants, hotels and schools in this area.

Despite an allowable 6.0 FAR development capacity, the 5-story height limit in the MLN1 form district greatly constrains the potential for new development and housing. While the narrow alleyways may require some design consideration to allow light and air, this should be accomplished through setback and massing specifications, not a severe limit on building heights, especially in the middle of DTLA.

Likewise, there is no clear need to limit commercial establishments to 5,000 square feet and hotels to 49 keys in the XN1 use district, or 50,000 square feet and 149 keys in the XC1 use district. We believe these are arbitrary limits that may ultimately constrain opportunities for tenants that are desirable to locate in DTLA.

K-12 schools in the XN1 use district should be allowed by-right and not be required to obtain a CUP. The Historic Core just to the west and Little Tokyo to the north are established residential neighborhoods in 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.

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.

## Union Station South

**Union Station South** is an area approximately bounded by the 101 Freeway, Alameda Street, 1st Street and LA River. **Union Station South** is primarily characterized by the following zoning:

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

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

[PUM2-G1-5] [XC1-FA] [CPIO]

[Medium-Plus-Unspecified-Medium 2, General 1, District 5] [Commercial-Mixed Community 1-Limited by Floor Area]

The Union Station South area is a uniquely zoned area that prohibits residential uses in the MR1 Use District north of Temple Street to preserve industrial uses and public facilities abutting the LA River, but allows for mixed-use development and a diversity of housing types south of Temple Street in the XC1 Use District. There are also several parcels zoned for public and institutional services and amenities mixed within these areas.

The MR1 Use District allows heavy commercial and light industrial uses, as well as a limited amount of commercial activity. The XC1 Use District allows for commercial uses generally up to 50,000 square feet per establishment on the ground floor, as well as a wide range of housing types.

The maximum FAR in areas covered by form district LUF1, including much of the area north of Temple Street, is 3:1 and there are no height limits. District PUM2 generally applies to the southside of Temple Street and allows a max FAR of 8.5:1 through the community benefits system, also without height limits.

Like the rest of DTLA, under the proposed plan in the areas where housing is permitted, Union Station South does not have density limitations. Throughout the area, above-grade parking is counted toward project FAR.

CCA is concerned about the hodge-podge mix of uses in this area and how it will connect to surrounding areas like Union Station, Little Tokyo and the Arts District. As proposed, this area limits alcohol uses to restaurants, does not allow for hotels larger than 149 keys and limits retail uses to no more than 50,000 SF. It proposes to ban housing north of Temple and preserves areas abutting the LA River for industrial uses, despite plans to revitalize the LA River and foster better connections with DTLA and surrounding areas. We are concerned that collectively these requirements do not support an inclusive DTLA and are out of character with the vision for DTLA as a vibrant, 24/7, urban environment.

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 industrial 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.