

# - DTLA 2040 -

## Neighborhood Profile: Toy 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 summer 2020.

This week we are highlighting the **Toy District**, 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.

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 **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]**

**[MLM2-SH1-5] [XC1-FA] [CPIO]**

**[Medium-Limited Medium 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 shopfront bay entryway, an alley-facing entrance and 16 ft ground-floor heights.

The area south of 5th Street is primarily zoned with the MLM2 form district and XC1 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. 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.

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

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. Additionally, while the MLM2 building height limits are more permissive, there is also no apparent rationale for limiting buildings to these prescribed heights.

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.