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introduction

The Central City United (CCU) Coalition,¹ as stakeholders in Skid Row, Little Tokyo, and Chinatown, proudly presents our People's Plan for an equitable and inclusive Downtown Community Plan. Our collective community engagement has resulted in the following policy and zoning recommendations that prioritize affordable and supportive housing, promote inclusive economic development, strengthen community leadership, create healthy neighborhoods, and sustain the culture of existing neighborhoods and peoples. The CCU People's Plan reflects the priorities and needs of our communities and envisions a Downtown where all communities—especially low-income communities, immigrants, and unhoused people—can live, work, and thrive.



Home to the City's oldest neighborhoods, Downtown Los Angeles has seen over a century's worth of transformation, with many more changes yet to come. At least 76,000 people currently live in the Downtown Community Plan Area,² with hundreds of thousands of people from across Southern California visiting Downtown each day to work, play, worship, and access healthcare and other vital services. This population will continue to grow. By 2040, Downtown is projected to add approximately 125,000 people, 70,000 housing units, and 55,000 jobs.

How will this growth happen? Will future development uplift the low-income residents and stakeholders who have built and strengthened Downtown neighborhoods for generations? Will new investments be directed to not only stabilize low-income communities and communities of color, but enable them to thrive? Will the decision-making process that drives Downtown growth be grounded in racial and economic justice?

These are some of the pressing questions that drive our collective engagement in the Downtown LA Community Plan Update (DTLA 2040).

To usher in a truly equitable future for Downtown, we need to learn from our past. Historically the City has done a poor job of planning for its most vulnerable residents. Like so many cities across the country, Los Angeles has a history of racist and discriminatory land use practices that have created and perpetuated segregation. Racial covenants, single-family zoning, and urban renewal are just a few examples of both explicit and masked efforts to "protect" white homeowners from "others." In fact, each of our three neighborhoods—Chinatown, Little Tokyo, and Skid Row—were originally created to specifically segregate low-income immigrant and houseless residents from the rest of the City. In more recent years, much has been made of the "revitalization" or "resurgence" of Downtown. But intoo many instances, the policies and practices driving this "resurgence" have caused more harm than benefit to low-income Downtown residents, including increased criminalization of unhoused residents and gentrification-fueled displacement and destabilization of low-income and immigrant communities. Our intimate historical experiences with harmful land use and zoning policies make us especially invested in ensuring DTLA 2040 advances truly equitable planning.

The City's past does not have to become its future. **Our current affordable housing and houselessness crisis makes the need for inclusive and equitable planning all the more urgent, and DTLA 2040 provides an important opportunity for exactly that.** As the City plans for growth, we believe these plans can be carefully tailored to ensure that Downtown becomes better for everyone, in particular residents and stakeholders at risk of displacement and those who are unhoused.

The CCU Coalition, led by the Southeast Asian Community Alliance (SEACA), Little Tokyo Service Center (LTSC) and the Los Angeles Community Action Network (LA CAN), as key stakeholders in Chinatown, Little Tokyo, and Skid Row, along with Public Counsel, proudly share our collective vision for an equitable, inclusive, people-centered DTLA 2040.

. The CCU Coalition came together to lift up the voices and concerns of the poorest and most vulnerable residents of Downtown in the community plan process. We know from experience that community-led planning results in healthier, more stable communities.

Our Coalition has been engaged with the Downtown Community Plan update process since its inception. We have spent, separately and collectively, hundreds of hours convening community

meetings, conducting outreach, and educating our communities across seven languages about the community plan process and discussing its impacts. Through this, we have built capacity among local residents to be active participants in the planning process.

The CCU People's Plan is the result of our collective community engagement and reflects the priorities and needs of residents in Skid Row, Little Tokyo, and Chinatown. The specific policy and zoning recommendations in the CCU People's Plan were developed in collaboration with residents and stakeholders, and are based on proven models, many of which have already been incorporated into other City planning documents. Our communities have contributed to the history, vitality, and unique culture of Downtown, which has made it the "heart of Los Angeles." As such, we believe that planning efforts for Downtown must include and elevate the voices of our communities in order to ensure a stronger and more equitable DTLA 2040.

our neighborhoods

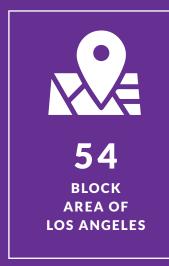
Skid Row, Little Tokyo and Chinatown each have their own unique histories, priorities, and needs. But, there is also a significant amount of shared history, values, and hopes for the future. Each neighborhood has endured the harmful impacts of discriminatory land use planning, and each neighborhood has demonstrated community resiliency and ingenuity that should be used as models for equitable planning across the City.

I. SKID ROW



Skid Row is home to the highest concentration of unsheltered individuals anywhere in the nation. On any given night, over 4,700 people are houseless and over 2,700 people sleep on the sidewalks in this 54-block area of Los Angeles.³ Skid Row is also a community, where low-income and unhoused Angelenos discover and create opportunity and organize around housing justice and human rights.

In 1976, the City of Los Angeles enacted a zoning plan to preserve the biggest collection of low-income housing in Los Angeles County by preserving the Skid Row neighborhood. In the nearly 50 years since then, many units of low-cost housing have been lost to conversion and demolition. But many other housing units have been taken out of slumlord hands and are now owned by nonprofits who have both renovated existing buildings and developed new ones. In addition to sidewalk encampments, thousands of Skid Row residents live in emergency shelters and short-term programs, as well as Permanent Supportive Housing, privately owned Residential Hotels, and Single Room Occupancy (SRO) hotels. Supporting Skid Row residents requires multiple coordinated efforts, including but not limited to creating more deeply affordable and supportive housing, preserving existing low-cost housing, strengthening tenants' rights, enforcing habitability standards and ensuring healthy homes, ending the criminalization of poverty, and promoting food justice and economic opportunity.







Skid Row is a predominantly Black neighborhood. In Los Angeles, Black residents make up just 9% of the population, but 38% of those experiencing houselessness.⁴ This underscores the importance of centering racial equity and justice in the DTLA 2040 process and its ultimate outcomes—not just for Skid Row in particular, but for all of the City's communities of color and historically ethnic-identified neighborhoods.

The Skid Row community has a history of strong and effective activism. Skid Row residents have successfully advocated for a moratorium on hotel conversions and the reinvestment in Gladys Park. And Skid Row residents took the initiative to start providing trash cans and cleaning up streets when the City wouldn't.⁵ That spirit of activism and resiliency now carries forward to DTLA 2040. Skid Row residents and service providers have been convening for years to evaluate the impacts of the Community Plan update and educate City officials about key priorities and needs.⁶ DTLA 2040 needs to center these priorities and needs in its policies, programs and zoning standards.

II. LITTLE TOKYO



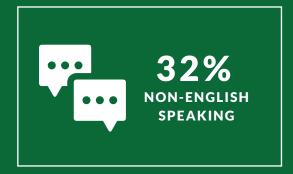
Scott Oshima

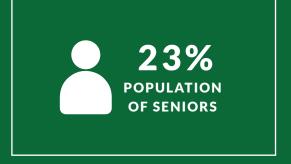
Little Tokyo is an over 130 year old community, the second oldest neighborhood in Los Angeles, and one of only three remaining historic Japantowns in all of the United States. Little Tokyo has endured waves of displacement, initially triggered by WWII Executive Order 9066, which authorized the internment of residents of Japanese descent and was followed by the City's use of eminent domain power to expand the Civic Center.

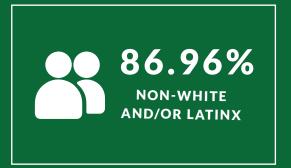
Yet Little Tokyo has endured and is now one of just two designated California Cultural Districts in the City of Los Angeles. The small neighborhood boasts more than 50 traditional and contemporary cultural and spiritual groups, organizations, and institutions. It is also home to over 15 major Japanese American, Asian American, and Pacific Islander arts and cultural institutions. The arts in Little Tokyo generate approximately \$55.5 million per year and 1,734 jobs. 8

Little Tokyo has historically been rich in long-time, family-run and multigenerational small businesses that are integral to Little Tokyo's culture, survival, and identity. Unfortunately, many have been struggling with rising rents and inconsistent patronage over the last five years? due to increased real estate pressures in broader Downtown and the expansion of light rail construction. The majority of new development in Little Tokyo since the mid 2000's has been private market rate housing and commercial development, but the community continues to fight for community control over publicly owned land that was taken during and after the WWII internment of Japanese residents and Japanese Americans.









There are about 3,589 people¹⁰ ¹¹ living in Little Tokyo, with an average household size of mostly one or two people, and an extremely low median income of \$20,169¹² primarily due to the high population of fixed and low-income senior residents (and portions of Skid Row residents). About 23% of the population are seniors.) About 32% of the community is non-English speaking and 86.96% of the population is non-white and/or Latinx. The majority of the residents are Asian (1,476), followed by Black residents (704), White residents (731), and other (678).

Little Tokyo, similar to Skid Row and Chinatown, is known for being pedestrian–friendly. The neighborhood's Walk Score (2016) is a high 94.01 and its Transit Score (2016) is a very high 97.41.¹³ The average number of vehicles per household is less than one. Additionally, the percent of people who commute via public transit (between 2013-2017) is close to 20%, which is almost four times the regional average. Over 15% of the Little Tokyo community walks to work, more than seven times the regional average.

DTLA 2040 is a critical opportunity to preserve rich cultural assets, increase affordable housing, promote a thriving economy of culturally significant and community-serving small businesses, support a growing senior population, and enhance some of the City's most transit-oriented and pedestrian-friendly development in Little Tokyo.

III. CHINATOWN



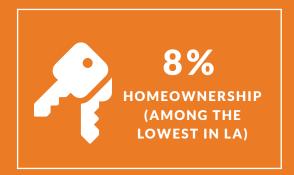
Rudy Espinoza

Chinatown was originally established in the 1800's in order to racially segregate Asian residents from the rest of the City.

Simultaneously, state and federal laws barred Asian residents from property ownership, access to higher education, and citizenship (and therefore the ability to vote), severely limiting Asian communities' ability to thrive. Provided with a captive audience of renters unable to live elsewhere, property owners in Chinatown had little incentive to maintain their properties, allowing the neighborhood to deteriorate into a slum until the City demolished the entire community to make way for Union Station.

Barred from accessing mainstream economic and educational opportunities, newly arrived immigrants and refugees responded by creating their own neighborhood associations, social service programs, and small businesses. Today, Chinatown is home to over 400 small businesses and micro-entrepreneurs, many employing local residents and providing vital culturally and linguistically needed goods and services. As a bustling residential and employment center for low-income Asian immigrants, Chinatown's jobs, retail, and affordable housing mix has meant that 25% of all households are able to go car-free. In fact, 11% of residents walk to work and Chinatown buses have some of the highest ridership in the entire Metro bus network, making Chinatown the model for a walkable, transit-oriented community.









However, the gentrification of Chinatown now threatens the cultural and historical fabric of the community. The adaptive reuse of buildings into creative office and mixed-use developments has led to the closure of four supermarkets and several community-serving small businesses as well as the loss of hundreds of local jobs. Even with thousands of new market rate units built in the last few years, Chinatown remains a low-income community with a median household income of \$28,500.¹⁷ With a 35% poverty rate and with 92% of Chinatown residents identifying as renters, many residents are only one rent increase away from becoming houseless.¹⁸

DTLA 2040 is an opportunity to usher in new standards and rules that can preserve Chinatown's important cultural and community assets while creating new housing that is truly affordable to the low-income Chinatown residents who have invested so much in their neighborhood.

our shared vision

Public support for equitable development policies is at an all-time high. In the last several years, voters overwhelmingly backed several local measures to increase the supply of affordable housing and fund solutions to our houselessness crisis.

Faced with these challenges and opportunities, we came together to create a People's Plan for Downtown that seeks to:

- Stop displacement by prioritizing tenant protections and creating a net gain of affordable and supportive housing.
- Promote inclusive economic development that supports workers, community-serving businesses, and residents on limited incomes.
- Strengthen community leadership in the planning and development of Downtown's low-income communities.
- Create neighborhoods that support the health, well-being, and dignity of all residents and stakeholders.
- Sustain the cultural practices and values of the existing neighborhoods and people.

policy recommendations

The Goals, Policies, and Programs recommended below were developed in collaboration with low-income residents and stakeholders in our communities, and are based on proven models, many of which have already been incorporated into other City planning documents, such as the South and Southeast LA community plans. Specific proposed amendments and recommendations to the Draft Downtown Community Plan Text (released June 2019) are included in a separate appendix.



HOUSING AND COMPLETE NEIGHBORHOODS

Amend current draft Policies and include new Goals, Policies, and Programs to:

- Prevent the displacement of low-income residents and strengthen tenant protections.
- Preserve existing affordable housing and ensure no net loss of affordable housing opportunities.
- Prioritize deeper affordability for residents most at risk of houselessness.
- Promote land trusts and community stewardship to prevent displacement and promote housing stability.
- Maximize the utility of public land in creating new affordable and supportive housing.
- Ensure that new development is accountable to community needs and land use incentives are consistent with value capture principles for affordable housing production.
- Promote and prioritize development of supportive and 100% affordable housing projects.
- Advance a comprehensive strategy to support houseless Downtown residents by increasing access to services and affordable housing and preventing unjust criminalization.



ECONOMIC DEVELOPMENT

Amend current draft Policies and include new Goals, Policies, and Programs to:

- Enhance quality employment opportunities.
- Promote inclusive entrepreneurship.
- Establish a definition and provide incentives and policies to preserve existing and promote new Community-Serving Small Businesses.
- Ensure inclusive and culturally relevant economic development.



URBAN FORM

Amend current draft Policies and include new Goals, Policies, and Programs to:

- Integrate anti-displacement principles into urban form and design.
- · Prohibit hostile architecture.
- · Promote safe walkable urban design.



HISTORIC AND CULTURAL RESOURCES

Amend current draft Policies and include new Goals, Policies, and Programs to:

- Center low-income communities in the promotion and preservation of cultural resources.
- Ensure adaptive reuse does not result in displacement of residents and Community-Serving Small Businesses.
- Promote low-income community engagement and involvement in historic and cultural resource programming.



WELLNESS AND SUSTAINABILITY

Amend current draft Policies and include new Goals, Policies, and Programs to:

- · Enhance community health.
- Prevent the negative health consequences of displacement by promoting equitable development, tenant protections, and support for Community-Serving Small Businesses.



DOWNTOWN PLACES

Amend current draft Policies and include new Goals, Policies, and Programs to:

- Ensure equitable development in each Downtown neighborhood.
- Prioritize deep affordability and clarify a mixed-income standard for new live/work development.
- · Prioritize deeply affordable housing in Skid Row.
- Strengthen Skid Row assets and prevent policy and design standards that harm extremely low-income and houseless residents.
- Ensure inclusive and responsible open space and affordable housing development.
- Amend existing draft policies to prioritize affordability and community-serving uses in Chinatown and Little Tokyo ("Village" Communities).
- Prioritize deeply affordable housing, displacement avoidance, inclusive economic development, and support cultural institutions in Village communities.



MOBILITY AND CONNECTIVITY

Amend current draft Policies and include new Goals, Policies, and Programs to:

• Enhance mobility and connectivity for the most vulnerable populations.



PUBLIC REALM AND OPEN SPACE

Amend current draft Policies and include new Goals, Policies, and Programs to:

- Promote park equity and inclusive open space in Downtown.
- · Advance equitable LA River revitalization.

zoning & community benefits recommendations

The following proposed changes to the Draft Downtown Community Plan Zones and Community Benefits Program (released October 2019) reflect the priorities and needs of our community members for more affordable housing, access to more publicly accessible open space, and the inclusion of a greater range of community benefits. More detail on the proposed recommendations is included in a separate appendix.

- Expand the IX1 district to ensure greater coverage of the 100% affordable housing standards.
- 2 Eliminate development incentives for moderate and abovemoderate income housing to focus on most needed deeply affordable housing.
- Adjust the on-site affordable housing incentive and density standards to achieve more effective value capture and better align with standards in the proven TOC program
- Prioritize on-site affordable housing to ensure inclusive neighborhoods.
- Prevent the direct displacement of current residents through strict requirements on the use of development incentives.
- Modify the definition of "Publicly Accessible Open Space" to ensure it is truly open to all.
- **Expand "Community Facilities" incentives to encourage a broader range of community benefits.**

conclusion

We are in a decisive moment. DTLA 2040 presents a unique opportunity to affirm the City's commitment to equitable, community-centered planning in one of LA's most diverse and rapidly changing communities. Building on progress in recent community plan updates, like the South and Southeast LA Community Plans, the City can advance new policies, programs, and zoning standards that directly address the harms of past discriminatory planning practices and equitably distribute resources and opportunities to low-income residents and communities of color in the Downtown Community Plan Area. And with significant attention on DTLA 2040 as the first Community Plan updates to apply new re:code LA zoning tools, the City can set a new citywide standard for equitable and collaborative community planning. None of this will be possible, however, unless the City actively and meaningfully engages the communities most at-risk of being excluded from the resources and opportunities flowing into Downtown. In collaboration with low-income resident leaders from Chinatown, Little Tokyo and Skid Row, the Central City United Coalition is proud to present this community-driven vision for an equitable DTLA 2040. We welcome the opportunity to work with the City to amend the Draft Plan to integrate these principles and to ensure a healthy, thriving, and sustainable Downtown for everyone.

- ¹ "Central City" refers to the Downtown Community Plan area
- ² Draft Downtown Community Plan, Table 1.1.
- ³ 2019 Greater Los Angeles Homeless Count Skid Row Data Summary, https://www.lahsa.org/documents?id=3527-hc2019-skid-row-data-summary.pdf
- ⁴ 2019 Greater Los Angeles Homeless Count City of Los Angeles Data Summary, https://www.lahsa.org/documents?id=3421-2019-greater-los-angeles-homeless-count-city-of-los-angeles.pdf; see also "Report and Recommendations of the Ad Hoc Committee on Black People Experiencing Homelessness," Los Angeles Homeless Services Authority, December 2018, https://www.lahsa.org/documents?id=2823-report-andrecommendations-of-the-ad-hoc-committee-on-blackpeople-experiencing-homelessness.
- ⁵ Los Angeles Poverty Department, Walk the Talk 2018, page 4, https://www.lapovertydept.org/wordpress/wp-content/uploads/2018/10/WTT2018.pdf.
- ⁶ See Inner City Law Center, Policy Briefing Paper, "Land Use Planning in Skid Row: Strategies to Prevent Displacement and Build Affordable Housing" June 2018, http://www.innercitylaw.org/wp-content/uploads/2018/06/skid-row-zoning.pdf?fbclid=lwAR3X0Q9YvC wtAKH3NZVJdYLPtkl2Xbk-OyEHMfd2DFb37Pq86ZqIJGkrjps.
- Sustainable Little Tokyo 2020, http://sustainablelittletokyo.org/content/2-projects/10-slt2020/slt-2020-brochure.pdf.
- ⁸ Sustainable Little Tokyo, Arts Economic Impact Report (forthcoming).
- ⁹ Sustainable Little Tokyo 2020, http://sustainablelittletokyo.org/projects/slt2020.
- ¹⁰ Our neighborhood demographics data is approximate because of census tract boundaries conflicting with the neighborhood boundaries. It includes portion of Skid Row and does not include some residents and institutions, particularly East of Alameda.
- ¹¹ Enterprise Community Partners Opportunity360 Tool, Census Tract 2062, https://www.enterprisecommunity.org/opportunity360/measure.
- ¹² Id.
- ¹³ Id.
- ¹⁴ Based on a census of small business and micro entrepreneurs in Chinatown conducted by SEACA in 2019.
- ¹⁵ American Community Survey, 2017 5-Year Estimates.
- ¹⁶ Id.
- ¹⁷ Id.
- ¹⁸ Id.

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