



February 24, 2017

Submitted electronically

Councilmember José Huizar
Chair, Planning and Land Use Management Committee
Los Angeles City Council
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Re: The Alexan Project, 9th and Hill Streets, Downtown Los Angeles

Dear Councilmember Huizar,

On behalf of the Los Angeles Conservancy, thank you for the opportunity to comment on the proposed Alexan project at 9th and Hill Streets. Given the visibility in particular of the proposed project and the culmination of other large hi-rise towers that are either proposed, in-progress, or recently completed, we think it is an important moment in time for Downtown Los Angeles.

We are now experiencing a boom in construction that brings greater vitality and much-needed reinvestment to Downtown, an objective the Conservancy and many others have worked toward for years. It is something we strongly support and believe there is an important role for new construction in helping to revitalize and reinforce the distinctive and unique historic character of Downtown. It is a core component of the original *Historic Downtown Los Angeles Design Guidelines*, produced for the Conservancy in 2002. As you know, this document became the basis for the City's *Broadway Design Guide* and shares many similar concepts with the *Downtown Design Guide*, both adopted in 2009. Furthermore, these goals are also emphasized in the Downtown Los Angeles Neighborhood Council's (DLANC) recent *Vision Downtown* plan that identifies the need to maximize infill opportunities.

The Conservancy usually does not comment or weigh in on new construction projects unless there is a clear and direct impact on a particular historic building or area. In the last few years, we have provided comments on several projects in Downtown, including the Broadway@4th project and the proposed Spring Street



Hotel project at 631-635 S. Spring Street. Each of these projects involves new construction within the Spring Street Financial District and the Broadway Theatre and Commercial District, both listed in the National Register of Historic Places. Similar to The Alexan project, both also propose hi-rise towers.

The Conservancy previously provided comments to DLANC's Planning and Land Use Committee about The Alexan project, and we submit the following because we have ongoing concerns that the project is not compatible with Downtown's Historic Core.

I. Proposed new construction within and immediately adjacent to Downtown's Historic Core should be compatible.

Compatibility within an historic context is a somewhat subjective concept as it should allow for dynamic new ideas and modern design concepts without being overly constricting or mimicking earlier architectural styles. The *Downtown Design Guide* states new construction should "respect historically significant districts and buildings, including massing and scale, and neighborhood context." DLANC's Principles and Guidelines state "new designs should take cues from the existing neighborhood character as well as address existing building typologies, densities, and intensities of use." The National Park Service also offers some guidance in context with the use and application of the *Secretary of the Interior's Standards* in a district or neighborhood setting. It states "introducing a new building or landscape feature that is out of scale or otherwise inappropriate to the setting's historic character" is not recommended.

The Alexan project is unique and challenging, in terms of its location and site at 9th and Hill Streets. It is not within but adjacent to and abutting a historic district, and surrounded by individually-designated historic landmarks. While the project site may be near the South Park area, it is physically a part of and linked to the Historic Core area and context. It is challenging when attempting to design new construction to address the context of two very different parts and aesthetics of Downtown. Our concern is that the current proposal relates primarily to a South Park context and is not fully compatible with the Historic Core. Some have suggested the creation of a "zone of respect" or buffer area, as there is not an easily discernible or clear fine line separating these two parts of Downtown (other than on a map).

The Conservancy believes there have been sincere efforts to ensure that The Alexan project is sensitive in design. We have met several times with the Trammell Crow Residential team and thank them for their willingness to listen to our concerns and attempts to address them through a series of revisions. The design has continually improved, which we greatly appreciate. In particular, changes to the base and podium create a much more pleasing pedestrian scale and experience that relates to the nearby historic context.

Nevertheless, the massing and height of the tower remain much more problematic, as the structure introduces a much different feel and scale than currently exists in the Historic Core. The Conservancy is not opposed in general to increased height, if sensitively designed to step back and ensure there are no



impacts through shade/shadow and the blocking of important viewsheds. It appears that Trammel Crow Residential has attempted to set back its building slightly to maintain partial visual access to the historic Eastern Columbia Building. Despite this adjustment, it is inevitable that major portions of this building's elevation will be blocked, given the overall height of the proposed hi-rise. We understand that the project previously proposed for this site in 2007 included greater setbacks to ensure that its tower preserved significant views of the Eastern Columbia's clock and tower, and we believe that a similar, feasible compromise could be achieved today. Our concerns with the height and massing of the proposed project also point to larger shortcomings in the existing *Downtown Design Guide*, which did not anticipate new development at this scale in the Historic Core when it was originally conceived.

In addition, the Conservancy has voiced strong questions about the compatibility of the projecting balconies on the primary elevations of The Alexan project, an area where we feel the project falls short. We previously raised this issue with other projects in Downtown, including the Broadway@4th project and the proposed tower at 4th and Hill streets (now called the Equity Residential Mixed-Use Project). We believe this design element greatly deviates from the character and overall compatibility of the Historic Core. While you can find balconies on secondary and rear facades throughout Downtown, including recent adaptive reuse projects, they are usually not prominently featured or located on primary facades. Projecting balconies introduce an entirely new rhythm and feel and are a primary design element of The Alexan and other hi-rise towers currently being proposed. While the *Downtown Design Guide* does not currently provide enough guidance in this area, it does state "heavy, solid balconies" should be avoided. The Broadway@4th project is a good example of how this feature can be reconciled with the existing character of the Historic Core. In that instance, the balconies were removed from the eleven-story base structure and were reduced in scale on the upper tower portion.

The balconies illustrate the larger challenges with The Alexan Project and its compatibility with the Historic Core. Overall, we think this design element is more in keeping with a Miami setting or the South Park area locally. Although the project site is in close proximity to South Park, it is still within the Historic Core and adjacent to a number of significant historic resources, including the National Register-listed Broadway Theatre and Commercial District. Its location has been cause for confusion and has hampered its compatibility, as it has been interpreted within two vastly different neighborhood contexts. We strongly believe that the project should be evaluated and designed within its appropriate context, namely the Historic Core.

II. Cumulative impacts of proposed new hi-rise construction in Downtown should be analyzed.

Overall, we have a number of outstanding concerns and, from a larger perspective, question the cumulative impacts of these types of hi-rise projects on the historic parts of Downtown. In addition to the potential visual and shade/shadow impacts, hi-rise towers of this scale greatly exceed the height of surrounding properties and introduce a new set of proportions to the neighborhood. In general the



Conservancy is a strong supporter of increased density and believes there is a clear role for this in Downtown. While new high-rise construction suits the context of other parts of Downtown, we, however, do not believe that projects of this scale are ultimately compatible with the existing character of the Historic Core environment.

In our previous comments on these types of projects, we have strongly urged the City to conduct a full analysis of cumulative impacts as part of any environmental analysis, examining the potential long-term effects of new construction at this scale on the integrity of the Spring Street Financial District and the Broadway Theatre and Commercial District within the Historic Core. We believe the overall impacts should be understood before it is too late. The number of these types of projects that are now either already approved or proposed, and the increasing concerns about them, only underscore the need for greater clarity and guidance. Given the increasing development pressure and concerns over cumulative impacts, the Conservancy believes there is an immediate need to revisit the City's *Downtown Design Guide* as a key component of the update to the Downtown Community Plan, which is currently underway. This would enable the City to plan for more sensitive, compatible development comprehensively as the Historic Core and surrounding neighborhoods continue to grow.

III. Conclusion

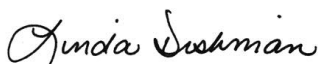
Thank you again for the opportunity to provide comments on this project and others in Downtown. As we all experience the welcome transformation and revitalization of Downtown, we are increasingly faced with new challenges that we may not have originally anticipated. It's important to address these before it is too late so that we can find the appropriate balance and ensure cultural and historic resources are preserved while still allowing for new development. The Conservancy looks forward to working with the City toward this goal.

About the Los Angeles Conservancy:

The Los Angeles Conservancy is the largest local historic preservation organization in the United States, with nearly 6,500 members throughout the Los Angeles area. Established in 1978, the Conservancy works to preserve and revitalize the significant architectural and cultural heritage of Los Angeles County through advocacy and education.

Please do not hesitate to contact me at (213) 430-4205 or ldishman@laconservancy.org should you have any questions and if we can be of assistance.

Sincerely,



Linda Dishman
President and CEO

