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Submitted electronically

Gabriela Juarez
City of Los Angeles
Department of City Planning, City Hall
200 North Spring Street
Los Angeles, CA 90012
Email: gabriela.juarez@lacity.org

Re: Beacon on Hill Project, 4th and Hill Streets, Downtown Los Angeles

Dear Ms. Juarez,

On behalf of the Los Angeles Conservancy, thank you for the opportunity to comment and provide input on the proposed Beacon on Hill project at 4th and Hills Streets in Downtown Los Angeles. Given the historic significance and existence of two National Register-listed historic districts downtown, and the culmination of other large high-rise towers that are either proposed, in-progress, or recently completed, we think it is an important moment in time for Los Angeles.

I. Downtown Los Angeles is experiencing an unprecedented amount of new, high-rise type of development

We are now experiencing a boom in construction that brings greater vitality and much-needed reinvestment, 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 many of you know, this document became the basis for the City's *Broadway Design Guide (Guide)* and shares many similar concepts with the *Downtown Design Guide*, both adopted in 2009.



The Conservancy often 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 year we have provided comments on several projects in Downtown, at the corner of 4th and Broadway and the proposed Spring Street Hotel at 631-635 S. Spring Street. Most recently we commented on The Alexan project at 9th and Hill Streets. Each of these projects involves new construction within LA's Historic Core and all propose high-rise towers.

II. Proposed new construction within and immediately adjacent to Downtown's Historic Core should be compatible and fully adhere to the *Downtown Design Guide*.

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 *Guide* states new construction should "respect historically significant districts and buildings, including massing and scale, and neighborhood context." 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 Beacon on Hill project is challenging, in terms of its context, location and site at 4th and Hill Streets. The design for the new construction should address the surrounding context and aesthetics of Downtown, and adhere to guidelines intended to respect and reinforce the existing character of the Historic Core district. At 33-stories in height, it presents a stark departure from the rest of the immediate surroundings. While we are not opposed to new construction and increased density, this project introduces a much different feel and scale than currently exists in the Historic Core. Questions have been raised in regards to the project's adherence to the *Guide*.

- A. **Section 03, Sidewalks and Setbacks:** The *Guide* states "ground floor space with a linear frontage equal to at least 50% or 75% of street frontage...shall be designed to accommodate retail, professional office, and live-work uses." Because the site falls within the boundaries of the Historic Core, 75% is required. However, it does not appear that the proposed project meets this requirement, instead providing far less frontage.
- B. **Section 05, Parking and Access:** The *Guide* states "[w]here parking above the ground floor that is not lined with habitable space is permitted, a maximum of three parking levels fronting on a public street shall be allowed above the ground floor, provided they are integrated into the design of the building façade and at least one habitable floor is provided directly above the visible parking levels."

According to project plans the above-grade parking is integrated at levels 2, 3 and 4 and will be screened through a perforated metal element. However, we also understand parking is provided at levels 5, 6 and 7 and wrapped on the exterior with habitable space. The *Guide* states there is to



be a maximum of three, above-grade, parking levels with at least one habitable floor above. The proposed project does not appear to meet this requirement.

- C. **Section 06, Massing and Street Wall:** The *Guide* states “[d]esign building massing to reinforce the street wall with well-scaled elements or structures that are sensitive to the neighborhood context” and “Monolithic slab-like structures that wall off views and overshadow the surrounding neighborhood are discouraged.”

As a high-rise tower with an 9-story podium, the proposed project will need to be carefully designed to address this issue and adhere to the *Guide*. Renderings released to date illustrate potential problems, including a view showing the side wall of the podium facing Grand Central Market. The rendering (below) showing a single wall with no openings and large-scale building identification signage appears to be the very definition of a “monolithic slab-like structure” that the *Guide* directly discourages.



- D. **Projecting Balconies:** This is an issue we have previously raised with the project at 4th and Broadway, at 631-635 S. Spring Street, and for The Alexan 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 Beacon on Hill project and other high-rise towers currently being proposed. While the *Guide* does not currently provide enough guidance in this area, it does state “heavy, solid balconies” should be avoided. Overall we think this design element is more in keeping with the South Park area or a Miami setting rather than the Historic Core area of Los Angeles.

III. Cumulative impacts of proposed new high-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 high-rise projects on the historic parts of Downtown. In addition to the potential visual and shade/shadow impacts, high-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 Historic Core and integrity of the Spring Street Financial District and the Broadway Theatre and Commercial District. 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, the Conservancy believes there is an immediate need to revisit the City’s *Downtown Design Guide*.

IV. 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.

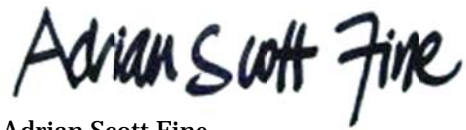
About the Los Angeles Conservancy:

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) 430-4203 or afine@laconservancy.org should you have any questions and if we can be of assistance.

Sincerely,

A handwritten signature in black ink that reads "Adrian Scott Fine". The signature is written in a cursive, slightly slanted style.

Adrian Scott Fine
Director of Advocacy

