

CITY OF LOS ANGELES  
CALIFORNIA



**DOWNTOWN LOS ANGELES  
NEIGHBORHOOD COUNCIL**

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**DOWNTOWN LOS ANGELES  
NEIGHBORHOOD COUNCIL  
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September 12, 2007

Emily Gabel-Luddy  
Director, Urban Design Studio  
City of Los Angeles Department of City Planning  
200 N. Spring Street  
Los Angeles, California 90012

RE: **Urban Design Guidelines**

Dear Emily:

At our regularly held public meeting on September 11, 2007, the Board of Directors of the Downtown Los Angeles Neighborhood Council ("DLANC") voted to submit the following comments with respect to the draft Urban Design Guidelines ("Guidelines"), pursuant to the motion passed on August 22, 2007 by DLANC's Planning & Land Use Committee.

As a general matter, DLANC supports the City's implementation of the Guidelines through the passage of the Downtown Housing Ordinance. Further, we appreciate the Urban Design Studio's role in moving forward expeditiously with the draft Guidelines and related streetscape standards.

CROSSWALKS (Page 1): This category needs more emphasis. Every intersection in Downtown needs all four crosswalks – there are still many with only three and signs to use the other crosswalks (in other words "go around.") Crosswalks should also be provided at main driveways (such as the one at Grand Central Station) and hotel porte cocheres.

SIDEWALKS (Page 6): Sidewalks should be located on both sides of the street. There are several places in Figure 2-1 where sidewalk widths are only shown on one side of the street (see, e.g., Figueroa Street north of 1<sup>st</sup> Street, Flower Street south of 11<sup>th</sup> Street).

SETBACKS (Page 11): Provisions for modifications to setbacks should be provided to accommodate existing buildings. If an existing building is not set back can a new building next door be partially built to the property line to cover the sides of the adjacent building? The building line should be more clearly defined. For example, can stairs and ADA ramps be built within a setback area?

PARKING (Page 20): Parking should be allowed as a primary use in certain situations. Parking under a street level park should be allowed. There are many narrow lots in downtown that can not be developed with on-site parking. Some parking garages with ground floor retail may help solve this problem. Parking garages on the outskirts of downtown near subway and other transit stations should also be considered. Parking within 25 feet of primary building access is too stringent. People should be able to walk 100 yards safely on the city sidewalks (some Los Angeles city blocks are more than 300 feet; parking on the same block as the building entrance should be fine). Consider decreasing retail parking requirements in pedestrian friendly areas and highly concentrated residential areas easily accessible by public transportation. The parking-related provisions of the Guidelines should be coordinated for consistency with the CRA-supported Downtown Parking Management Implementation Project.

BIKE PARKING (Page 20): While alternate modes of transportation should be encouraged, some secure bicycle parking within residential garages can be an eyesore. Chain-link fences within the common space of a building/garage should be discouraged.

RESIDENTIAL PRIVACY (Page 24): Some of the minimum line-of-sight distances between units may be too far for a dense urban environment. Consider revising the distances for areas where higher density is encouraged.

NO STUCCO (Page 24): Please also discourage the use of Type V (“stick”) construction in historic areas of Downtown where it is not historically prevalent and in areas where the mean building height is above 5 stories.


STREET TREES (Page 27): Please also add the proper care/maintenance of these trees to the Guidelines. Only allow ficus trees cautiously; if not trimmed regularly, they will damage the sidewalks.

DLANC would like to coordinate with the Urban Design Studio and other Downtown stakeholders to undertake a pilot program to review and test the draft Guidelines and related street standards. The goal of this pilot program would be to evaluate the draft Guidelines and street standards so that they can be quickly finalized and implemented. In turn, these documents should facilitate the review and approval of new Downtown projects by the Planning Department and the Community Redevelopment Agency.

DLANC appreciates the opportunity to provide these comments. We kindly request that a copy of any revised guidelines or other policy documents relating to their implementation be provided to DLANC at the address listed above. We look forward to working with the Urban Design Studio to finalize and implement the Guidelines.

Very truly yours,

Very truly yours,



J. Russell Brown  
DLANC President



Shiraz D. Tangri  
DLANC Planning & Land Use Committee Co-Chair

CC: Gail Goldberg (Director, Department of City Planning)  
Jan Perry (Councilmember, Council District 9)  
José Huizar (Councilmember, Council District 14)