



January 13, 2015

Los Angeles Department of City Planning
200 North Spring Street
Los Angeles, California 90012

RE: Arts District Interim Live/Work Ordinance

Dear Planning Commission President Ambrose:

At our regularly held public meeting on January 12, 2015, the Board of Directors of the Downtown Los Angeles Neighborhood Council (“DLANC”) voted to support the above request, pursuant to the motion passed on December 16, 2014, by DLANC’s Planning & Land Use Committee (“PLUC”).

DLANC supports the Draft Arts District Live/Work Interim Zone Ordinance. DLANC would like to commend the Planning staff on a great job they have done crafting an ordinance that allows progress while preserving the industrial land in the Arts District of Downtown LA. DLANC would like to make some recommendations to fine tune the ordinance, but first would like to set the context for the discussion.

DLANC boundary within the Interim Zone is below 7th Street, southern tip of the proposed Artist-In-Residence map. The majority of the Interim Zone sits within Historic and Cultural Neighborhood Council (“HCNC”). Although the area within DLANC boundary is not significant, what happens in Arts District is important to the rest of Downtown community as a whole.

DLANC recently published a “Vision Downtown”, a comprehensive vision plan that establishes guiding principles for land-use, mobility, public realm, corridors, and other opportunities for Downtown. In this document, DLANC takes a position to “Keep the light on” for manufacturing to allow for return of future industrial jobs in the form of clean-tech or other uses that are compatible with wholesale, office, retail, hotel, and residential uses. The future policy of Downtown’s industrial land should promote “Flex” or “Hybrid” districts that can allow mix of all compatible uses beyond the typical mixed-use buildings with ground floor retail and typical single use above.

Also in this document, DLANC sets a goal to increase the population to 100,000 residents by 2025. With the current projects under construction and in planning stages, it is likely that this goal would be easily reached. As it continues to grow, Downtown should prioritize housing for all incomes and generations. One of the greatest characteristic of Downtown is its ethnic,

economic, and cultural diversity. The city should encourage housing production at all price levels, both market rate and subsidized, to ensure this diversity continues to exist.

Overall vision of Downtown as it relates to the Arts District, preservation of neighborhood character and quality of design are two key issues as it transitions from industrial to a Hybrid district. Warehousing and heavy industrial uses will continue to fade out as opportunities for residential, industrial/clean-tech, creative office, retail, galleries, hotels, and other compatible developments replace the outdated uses. Having a smart policy in place like the Arts District Live/Work Interim Zone Ordinance is critical in taking advantage of the development boom and allowing investments to create jobs and further enhance the Arts District community and Downtown as a whole.

Here are DLANC's recommendations for the Draft Ordinance:

1. Encourage preservation of buildings with historic character(s) to protect the layers of history. Old Pasadena's redevelopment plan is a good example to follow. Integrating the existing façade into the new building for example can be seen throughout Old Pasadena and has been a proven method to retaining character while allowing for new developments. (I.e. if there's a 1 story existing old brick building with beautiful details, integrate that into the new taller building's façade.) This should also apply to public realm such as rail road ties, zero curbs, and other unique elements.
2. Incentivize other uses such as creative office, clean-tech, and other job creating uses. Current draft only allows FAR bonuses for Live/Work uses.
3. Incentivize other public benefits such as historic preservation, public open space, reuse of existing buildings, sustainable practices, in addition to the menu of incentives.
4. Set an equal base requirement for affordable housing instead of tier system set forth in B2b.1 of the Draft Ordinance. Allow additional incentives for providing more than the base.
5. Require frontage percentage of Ground Floor active uses to ensure activation of sidewalks and minimize blank walls.
6. Allow stand-alone parking garages (with activating uses on the ground) so parking district concept can be applied.
7. Revise Resident Production Space requirements in Type A Live/Work buildings. Type A is primarily a residential use with home occupation. To ensure affordability and art/production functionality to this use type, no minimum unit size should be applied but require ample common resident production space to offset the limited work space within the units. The draft ordinance requires minimum 500sf of Resident Production Space per building. The ordinance should require 25 sf per unit (or appropriate requirement per unit) for Resident Production Space to allow for artist residents to do large format work, hazardous work, or collaborative work with other residents/artists.

Micro lofts and subsidized affordable units are appropriate for this building type since it allows economically disadvantaged artists to reside in the Arts District. Requiring Resident Production Spaces in relation to number of units in the building will provide

ample work space, free of charge, which has become unaffordable and caused displacement of many Artists from the Arts District. As currently written in the Draft Ordinance, 100 sf per unit of Arts & Productive Uses are required but it does not specify whether this space is available and accessible to the residents free of charge or intended to be solely leasable area.

8. Encourage Type B Live/Work units. As stated in DLANC's Vision Downtown, the uniqueness of Flex Live/Work buildings is that there is a mix of commercial and residential uses integrated throughout the entire building, not segregated by ground floor and upper floors. Producing spaces that allow flexibility to use as a residence, office, showroom, design/art studio, tech incubator, etc. are important in the creation of the "Flex" District.

Type B Live/Work units allow for this flexibility and permit up to 5 employees within a unit. These buildings should be designed to the most intensive use allowed within Live/Work units in terms of occupancy, structural loads, accessibility, mechanical systems, and plumbing facilities (LA Building Code 419.3-419.9) in order to facilitate all uses allowed within Type B Live/Work: R2, B, M, and F. A minimum unit size should be applied for this use to accommodate employees. This use should be treated as a commercial use and not be subject to affordable housing.

Type B Live/Work should be designed so smaller units can be combined into larger spaces for flexibility. The Building Code allows up to 3000 sf within a single Live/Work unit. Integrating the ability to demise partition walls between smaller units to create larger units within the Building Code allowance would promote "Flex" use approach.

9. Refrain from using specific prescriptive design requirements such as 15% minimum green screen or mural in all new buildings. This can have an adverse effect of all the new building façades looking generic. Instead, provide general guidelines and let architects and artists be creative about interpreting the requirement. The existing visual characters, especially the murals, are derived from opportunistic and creative intentions, not prescribed requirements.
10. Establish a Formal Design Review process. Zoning is not a good tool to control aesthetics. Preservation of neighborhood character in a built form deals with context, massing, reuse or integration of existing buildings and streetscape, materials, urban design, and other elements that are more art than science. Zoning may require individual components that make up a good building but cannot control composition, beauty, or other subjective qualities of design.

Thank you for your consideration of these comments.

Very truly yours,

Very truly yours,



Patricia Berman
DLANC President



Simon Ha, AIA, LEED AP
DLANC Planning & Land Use Committee Co-Chair

CC: Michael LoGrande (LADCP)
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