



September 9, 2011

Submitted by email

Mr. Hadar Plafkin
Environmental Review Coordinator
Los Angeles Department of City Planning
200 North Spring Street, Room 750
Los Angeles, CA 90012
Email: Hadar.Plafkin@lacity.org

Re: Century Plaza Mixed-Use Development Draft EIR, ENV-2008-4950-EIR

Dear Mr. Plafkin:

On behalf of the Los Angeles Conservancy, thank you for the opportunity to comment on the Draft Environmental Impact Report (Draft EIR) for the Century Plaza Mixed-Use Development. The Los Angeles Conservancy is the largest local historic preservation organization in the United States, with over 6,000 members. Established in 1978, the Conservancy works to preserve and revitalize the significant architectural heritage of Los Angeles through advocacy and education. The Conservancy's all-volunteer Modern Committee has been at the forefront of preserving mid-century architecture since its inception in 1984.

When the initial Century Plaza Development project (Option A) was announced in late 2008 calling for the demolition of the Century Plaza Hotel, the Conservancy embarked on a wide-ranging advocacy effort to raise awareness about the significance of the hotel and find preservation solutions that retain the hotel while meeting the goals of the applicant, Next Century Associates. At the request of Los Angeles City Councilmember Paul Koretz, extensive discussions followed in late 2009 with Next Century Associates' project team, the National Trust for Historic Preservation, and the Conservancy. We are pleased to see that the preferred project (Option B) and several alternatives evaluated in the Draft EIR preserve the Century Plaza Hotel as a historic resource so that it may continue to be a vital asset and cultural touchstone for Los Angeles.

I. Century Plaza Hotel has, and should retain, eligibility as a historic resource in the approved project.

The Conservancy has always maintained that the Century Plaza Hotel is a significant historic resource. Since its opening in 1966, the Century Plaza has served as a premiere hotel for celebrities, politicians, and world dignitaries, as well as hosting countless conferences and events for Angelenos and visitors alike. It was built as the centerpiece of

Century City, a “city within a city” that heralded a bold new approach to urban design. The 19-story building (sixteen above grade and three below ground) was designed by renowned architect Minoru Yamasaki (1912-1986), who would later design New York’s World Trade Center twin towers (1974-2001) and the twin Century Plaza Towers (1975) across Avenue of the Stars from the hotel. With its sweeping shape and formal expression, the Century Plaza Hotel strongly conveys the postwar optimism of the 1960s, and it helped fuel the development of Century City as a world-class destination in the ensuing decades.

The historic resources evaluation conducted by Architectural Resources Group (ARG) in the Draft EIR concurred with the Conservancy’s position and determined the hotel eligible for the California Register of Historical Resources under Criterion 1 for its role in social history as a hub of political, social, and cultural activity in the City of Los Angeles and under Criterion 3 as an example of pivotal work by Minoru Yamasaki, who is recognized as one of the leading architects of the New Formalist movement. As such, the Century Plaza is also eligible for designation as a City of Los Angeles Historic-Cultural Monument (HCM) and is considered a historic resource under the California Environmental Quality Act (CEQA).

From the beginning, the Conservancy’s goal in this project has been to ensure that the hotel remains eligible for local and state listing as a landmark. As such, we strongly oppose Option A, in which the hotel would be demolished for new construction at the site, as the hotel would no longer exist as a historic resource. Alternatives 1, 3 and 4 retain the hotel, however none meet all project objectives *and* maintain eligibility of the hotel as a historic resource. Only Option B and Alternative 5, The Community Input Alternative, would both rehabilitate the Century Plaza Hotel and retain its eligibility as a historic resource while also meeting all of the project objectives.

II. Rehabilitation of the Century Plaza according to the Reuse Components and Treatment Protocol will result in less than significant impacts under CEQA.

According to CEQA Guidelines, the threshold for substantial adverse impacts to historic resources is “physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historic resource would be materially impaired.”¹ The significance of a historic resource is “materially impaired” if it is demolished, or if those physical characteristics that convey its historical significance or justify its eligibility for the California Register or a local register are materially altered in an adverse manner. In other words, and as stated in the Draft EIR, a proposed project that would render an eligible historic resource ineligible for state or local listing would constitute a significant adverse impact under CEQA.

As outlined in the Reuse Components (Preservation Components, Viewshed Components, and Site Development Components), the rehabilitation of the hotel as part of an overall development would include the combination of some floors for double-high residential

¹ CEQA Guidelines, Section 15064.5: Determining the Significance of Impacts to Archeological and Historical Resources.

units, conversion of the lobby into an open-air breezeway, reconfiguration of meeting spaces, infill of the sunken plaza, and the addition of rooftop amenities. However, the hotel would retain almost all of its character-defining features, and the Treatment Protocol, based on the *Secretary of the Interior's Standards for Rehabilitation*, would prioritize retention and repair of historic fabric and guide rehabilitation. Much of the new construction on the site would be limited to the west (rear) side of the parcel, which has been previously modified and retains little historic fabric. Other new construction along Constellation Boulevard and Avenue of the Stars would be of a scale that maintains the important viewshed of the Century Plaza as seen from Avenue of the Stars. In September 2010, at the request of Councilmember Paul Koretz, the Cultural Heritage Commission reviewed the Option B plans and determined that the Century Plaza Hotel would retain its eligibility for Historic-Cultural Monument designation after the proposed work is completed.

While it is unfortunate that some elements of the Century Plaza Hotel will be compromised, most notably the sunken plaza, we are pleased that 90 percent of the identified character-defining features of the building and site will be retained. Additionally, the proposed design along Avenue of the Stars will maintain a strong reference to the sunken plaza. The Conservancy concurs with the Draft EIR finding that the proposed changes would not jeopardize the ability of the Century Plaza to convey its significance or its eligibility as a historic resource if the rehabilitation is implemented as outlined in the Reuse Components and Treatment Protocol. As such, no significant impact would occur under either scenario of Option B, or under the alternatives that adhere to the same guidelines.

The Conservancy commends Next Century Associates for their willingness to work with the preservation community and for their vision in embracing a project that includes the preservation of the Century Plaza Hotel. We appreciate the efforts to maintain the hotel's eligibility as a historic resource and we support Option B as well as Alternative 5 as both retain eligibility of the hotel as a historic resource and meet all project objectives. We look forward to working with the project team in applying the Treatment Protocol to the rehabilitation of the hotel. Once completed, we hope the success of this collaborative process with Next Century Associates can become a model for future preservation projects.

Please feel free to contact me at (213) 430-4205 or ldishman@laconservancy.org should you have any questions.

Sincerely,



Linda Dishman
Executive Director

cc: The Honorable Paul Koretz, Council District 5
National Trust for Historic Preservation, Western Regional Office
City of Los Angeles, Office of Historic Resources