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Submitted electronically

Craig Chalfant
Development Services Department
333 West Ocean Boulevard, 5th Floor
Long Beach, CA 90802
Email: craig.chalfant@longbeach.gov

Re: 2nd & PCH Project, Draft Environmental Impact Report (SCH #2014031059)

Dear Mr. Chalfant:

On behalf of the Los Angeles Conservancy, thank you for the opportunity to comment on the Draft Environmental Impact Report (EIR) for the proposed 2nd & PCH Project. We are deeply concerned that the project proposes demolishing a building that the Conservancy and others in the preservation community have long considered to be an eligible historical resource.

Since 2010, the Conservancy has repeatedly pressed the City of Long Beach to treat the 1963 SeaPort Marina Hotel as a historical resource for purposes of the California Environmental Quality Act (CEQA). We firmly believe the property is architecturally and culturally significant and strongly urge the City of Long Beach, as the lead agency under CEQA, to consider the hotel a historical resource and to mandate consideration of potentially feasible alternatives to demolition and mitigation measures that reduce impacts on historical resources in the Final EIR.

The Conservancy and our Modern Committee, as well as Long Beach Heritage, have long recognized the significance of the SeaPort Marina Hotel as a rare local example of a Gooie style garden motel and as an important local example of the work of prominent African American architect Roy Anthony Sealey. In 2010 and 2011, the Conservancy submitted comments on the Draft EIR and Recirculated Draft EIR for the Second + PCH Project previously proposed for the site. We subsequently submitted comments on the Notice of Preparation (NOP) for the PCH & 2nd Project in 2014.

Then and now, as part of these comments, the Conservancy has provided compelling information on the historical significance of the SeaPort Marina Hotel and the need to evaluate and recognize the structure as a historical resource under CEQA.

I. The SeaPort Marina Hotel (Edgewater Inn) qualifies as an historical resource for purposes of CEQA

A property's potential eligibility for an historic register, rather than actual listing, is sufficient evidence for the city to consider that resource historic under CEQA (CEQA Guideline §15064.5 (a)(3)). As the authoritative guide to the state's significant architectural and cultural resources, the California Register serves to identify, evaluate, register, and protect California's historical resources. To be determined eligible for the California Register, an historical resource must be



significant at the local, state, or national level under one or more of the following criteria:

1. It is associated with events or patterns of events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States; or
2. It is associated with the lives of persons important to local, California, or national history; or
3. It embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of a master, or possesses high artistic values; or
4. It has yielded, or has the potential to yield, information important to the prehistory or history of the local area, state or the nation.

In addition to meeting one or more of the four above criteria, California Register-eligible properties must retain sufficient integrity to convey historic significance; it need not retain all aspects of integrity, but only a sufficient degree of those aspects of integrity that relate to why it is significant.

Contrary to previous evaluation findings for the SeaPort Marina Hotel, the Conservancy believes the subject property does meet two criteria for designation and does maintain sufficient integrity to convey its historical significance. The SeaPort Marina Hotel retains its physical integrity as a whole, as the most recent evaluation concedes, and remains identifiable as a garden motel characterized by distinctive Googie style design features.

Designed by Roy Anthony Sealey (1917-), a prominent African American architect, the Conservancy believes that the SeaPort Marina Hotel is eligible for listing in the California Register as the work of a noted architect (criterion 3) and as a rare surviving example of a 1960s Googie-style garden hotel (criteria 1 and 3).

While studying architecture at the University of Southern California in 1939, Sealey worked for renowned architect Paul Revere Williams. He left Williams' practice in 1945 to open his own office nearby on Wilshire Boulevard. As an indication of his prominence, Sealey was profiled in an article in the August 1950 edition of *Ebony* magazine, "Architect for the Wealthy," including an interview and photographs of several buildings he had designed.¹

Although Sealey had worked as a successful designer for nearly two decades, he did not obtain his California architect's license until 1957. By the 1960s, he was "one of a small group of notable African American architects practicing in Southern California."² Among Sealey's notable projects include the Brierwood Terrace Valley Convalescent Hospital in Encino (1958); the Cockatoo Hotel in Inglewood (1961); the East Los Angeles Department of Social Services (1967); and the expansion of the County USC Medical Center (1968-75). The SeaPort Marina Hotel is not only the best example of Sealey's work in Long Beach, but is also a rare surviving intact example of a mid-century garden motel.

Completed in 1963, the SeaPort Marina Hotel (originally known as the Edgewater Inn) included two-hundred guest rooms and suites, three restaurants, a 24-hour coffee shop, two cocktail lounges, convention and meeting rooms seating 1,000 people, a gift shop, liquor shop, a yacht catering service and a children's playground. The hotel was an important addition to the Long Beach hospitality business in the early 1960s. Located across from the recently completed Alamitos Bay Marina, the hotel catered to tourists driving along Pacific Coast Highway, boaters docked at the marina, conventioners, and other groups holding events there.

The SeaPort Marina Hotel exhibits several distinctive elements characteristic of the mid-century Googie-style architecture, including the double zigzag layout of the guest room wings, the "Y" shaped piers of the main building, and the folded plate roofline of the circular lobby and convention facilities. Other extant

¹ PCR Services Corporation, "Second + PCH Development, Recirculated Draft Environmental Impact Report," City of Long Beach, March 2011, Section IV.D-29.

² Ibid.



character-defining features include the lozenge shaped roofline on the motel block, decorative concrete block screen, decorative lozenge shaped iron balcony railings, original aluminum mullions and glazing, and mature plantings and palm trees (further depicted in Attachment A). The hotel's striking roofs and piers are similar to those found in Sealey's design for the Pittman Dog and Cat Hospital (1964), located at 2901 Exposition Boulevard in Los Angeles, which was recently restored to its original condition.

The City of Long Beach's 2009 Historic Context Statement states, "Examples of the Googie style are rare in Long Beach; however, there are a few scattered within areas of postwar development, particularly the Los Altos area."³ The Historic Context Statement further states:

Because pure Googie style is uncommon in Long Beach, **it is more likely that a building will feature elements of the style rather than showcase a complete package** [emphasis added]. A Googie style building will most likely be significant as an individual resource. Eligible resources should retain most of their character-defining features, although some impact or loss to character-defining features may be acceptable for local designation due to the rarity of the type and the degree of integrity compared to other extant examples. Original materials, roof configuration, and concept of glass walls are critical in conveying the essence of the style, as are period signage and features such as lighting that are suggestive of the Space Age.⁴

Because compelling evidence supports the fair argument that the SeaPort Marina Hotel qualifies as a potential historical resource under CEQA, the Draft EIR should have evaluated it as such and considered preservation alternatives and appropriate mitigation measures to substantially lessen or avoid such impacts.

II. The Final EIR should analyze potentially feasible alternatives and mitigation measures that lessen or avoid significant adverse impacts on historical resources

A key policy under the California Environmental Quality Act (CEQA) is the lead agency's duty to "take all action necessary to provide the people of this state with historic environmental qualities and preserve for future generations examples of major periods of California history."⁵ The EIR is considered "the heart" of CEQA because it provides decision makers with an in-depth review of projects with potentially significant environmental impacts and analyzes a range of alternatives that reduce those impacts.⁶ Accordingly, the EIR should include preservation alternatives and mitigation measures that attempt to meet project goals and reduce significant adverse impacts to historical resources.

Under the current range of alternatives, only the No Project/Reoccupation of Existing Hotel Alternative retains the Seaport Marina Hotel. The EIR should be augmented to include one or more alternatives that adaptively reuse hotel buildings and/or incorporate the hotel's most distinctive elements into future development on the site. We recommend and urge the City to evaluate at least one preservation alternative in the Final EIR, or modify one of the existing alternatives to adaptively reuse the existing hotel buildings to the greatest extent possible, while seeking to achieve most project objectives.

Given the presence of a potential historical resource under CEQA, the City should adopt protections against preemptive demolition of the Seaport Marina Hotel, including a mitigation measure barring issuance of demolition permits until a permanent replacement project is pending and the applicant has demonstrated the financial resources and means necessary to complete the proposed replacement project within a reasonable timeframe (i.e. construction to commence within six months of receipt of all necessary city approvals).

About the Los Angeles Conservancy

³ Historic Context Statement, City of Long Beach. Page 233. July 10, 2009.

⁴ Historic Context Statement, City of Long Beach. Page 233. July 10, 2009.

⁵ Public Resource Code, Sec. 21001 (b), (c).

⁶ *Sierra Club v. Gilroy City Council* (1990) 222 Cal.App.3d 30, 41; also see PRC Secs. 21002, 21002.1.



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.

Thank you for the opportunity to comment on the Draft EIR for the 2nd & PCH Project. Please do not hesitate to contact me at (213) 430-4203 or afine@laconservancy.org should you have any questions or concerns.

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

Attachment: Edgewater Inn/Seaport Marina, Major Architectural Features

cc: Docomomo Southern California
Long Beach Heritage

