



December 7, 2016

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Re: ENV-2016-2580-MND, 3700 Wilshire Boulevard, (Beneficial Plaza and Liberty Park)

Dear Ms. Bleemers:

On behalf of the Los Angeles Conservancy, we submit these comments on the historic significance of the former Beneficial Plaza and Liberty Park at 3700 Wilshire Boulevard, now known as Wilshire Park Place, and the need for a full Environmental Impact Report (EIR) prior to the approval of any project that would adversely impact this building and its park.

The Conservancy has long considered Beneficial Plaza and Liberty Park to be a significant historical resource. The proposed project, which would replace Liberty Park with a 36-story mixed-use residential tower with low-scale retail spaces, would remove an integral component of the property's original design and destroy the interlinked aesthetic relationship that the Beneficial Plaza tower has with the park and Wilshire Boulevard and thus result in significant impacts, whereby the California Environmental Quality Act (CEQA) calls for the need to identify and consider a range of viable preservation alternatives.

The Conservancy believes that Beneficial Plaza and Liberty Park, which attains 50 years of age in 2017, qualifies as a historical resource based on its architectural and cultural significance associated with master designers, its unique site plan integrating a large-scale landscaped park, and its association with Beneficial Insurance Group CEO Joseph N. Mitchell, whose leadership resulted in a significant and unique aesthetic contribution to the Wilshire corridor.

The Mitigated Negative Declaration's (MND) conclusion that the project will have "no impact" on historical resources is based on flawed analysis. It is the responsibility of the lead agency to properly evaluate the project area for potential historic and/or cultural resources. Yet no current evaluation was prepared and the MND instead relied on a 2009 survey, for which the subject property was only 41 years of age when evaluated the previous year.

Therefore, the city must reject the MND's finding that the project will have "no impact" on historical resources and require the preparation of an EIR.



I. Significance of Beneficial Plaza and Liberty Park

The property at 3700 Wilshire Boulevard, originally Beneficial Plaza and now known as Wilshire Park Place, was developed by Beneficial Insurance Group as the company's \$16.7 million international headquarters and completed in 1967. The 11-story office tower was designed by the nationally prominent architecture firm Skidmore, Owings & Merrill with master architects Gordon Bunshaft and Edward Charles Bassett serving as lead architects. The building's exterior is comprised of modular units of precast shocked concrete finished in granite aggregate.

A unique feature of the property is Liberty Park, an expansive, 2.5 acre integrated landscape fronting the office tower containing hardscape and softscape elements and a replica of Philadelphia's Liberty Bell. A central grassy expanse with an off-center grove of Canary Island Pines is framed by a U-shaped promenade and spatially linked to the office tower by a plaza featuring patterned paving. Liberty Park is believed to have been designed by nationally prominent landscape architect Peter Walker.

The concept of the 315 foot building setback and park as community open space came from President and CEO of Beneficial Insurance Group, Joseph N. Mitchell, and was noted at the time of completion as the deepest setback for a commercial building in the nation. Mitchell's and Beneficial Insurance Group's grand gesture of community open space on corporate property was a response to the paucity of green space around office buildings at the time. Mitchell was honored by a proclamation from the City of Los Angeles for his contribution to the community--decades ahead of his time when developers now insert pocket parks for community benefit.

II. The MND's conclusion that the project will have "no impact" on historical resources is unsupported

The Mitigated Negative Declaration's (MND) conclusion that the project will have "no impact" on historical resources is based on flawed analysis. It is the responsibility of the lead agency to properly evaluate the project area for potential historic and/or cultural resources. Yet no current evaluation was prepared and the MND instead relied on a 2009 survey, for which the subject property was only 41 years of age when evaluated the previous year.

A key policy under 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."¹ Indeed, CEQA review has proven to be one of the most effective tools that we have to address the erosion of our cultural heritage. It can prevent irreversible losses through careful consideration of alternatives that achieve most of the project objectives while avoiding significant impacts on the environment.

CEQA establishes a low threshold for the consideration and evaluation of potential historic resources as part of the environmental review process—a clear benefit for communities by ensuring that potential adverse impacts are properly evaluated and mitigated. Therefore, the city must reject the MND's finding that the project will have "no impact" on historical resources and require the preparation of an EIR.

¹ PRC §21001 (b), (c).

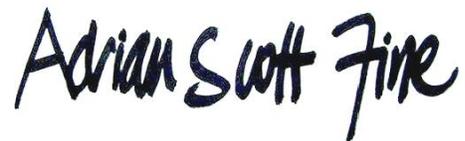


About the Los Angeles Conservancy:

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.

Thank you for the opportunity to comment on the MND for the proposed project at 3700 Wilshire Boulevard. Please do not hesitate to contact me at (213) 430-4203 or afine@laconservancy.org should you have any questions or concerns.

Sincerely,

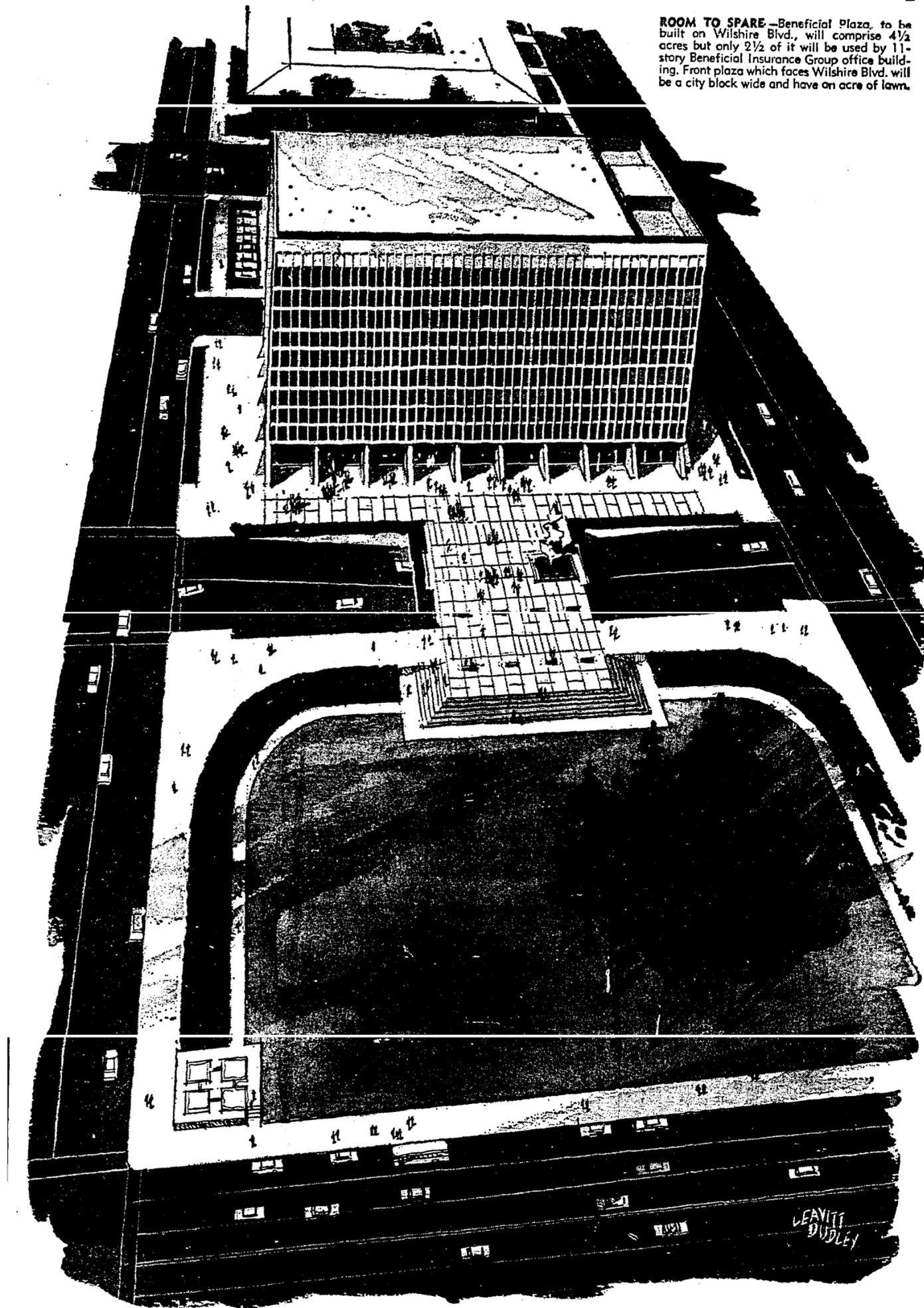


Adrian Scott Fine
Director of Advocacy

cc: Councilmember Herb Wesson, Council District 10
Ken Bernstein, Los Angeles Office of Historic Resources
Craig Bullock, CRA/LA



Beneficial Plaza to Add Open Spaces to City



ROOM TO SPARE—Beneficial Plaza, to be built on Wilshire Blvd., will comprise 4½ acres but only 2½ of it will be used by 11-story Beneficial Insurance Group office building. Front plaza which faces Wilshire Blvd. will be a city block wide and have an acre of lawn.

BY TOM CAMERON, Times Real Estate Editor

They're thinking "big" in the downtown Los Angeles and Wilshire districts these days, with high-rise the byword in both office buildings and apartment structures. We've announced dozens of construction projects involving 20 stories or more in the last couple of years.

One developer is not only going up, but out.

That this is not an impossibility is being demonstrated in the block bounded by Wilshire Blvd., Serrano, 7th St. and Oxford Ave., where Beneficial Insurance Group is erecting an 11-story office building to cost \$16.7 million.

The site comprises 4½ acres, but the building will occupy only 2½ acres, and with its front wall 315 feet from Wilshire Blvd. it will have the deepest setback of any major office building in the United States.

Its name is Beneficial Plaza. Address: 3700 Wilshire Blvd.

Total of \$2.5 million, representing the value of the land which is to be free of construction, is Beneficial's intended contribution to promotion of aesthetic values in the

area, explains Joseph N. Mitchell, chief executive officer of Beneficial Insurance Group, known in the industry as "BIG."

Beneficial Standard Life, parent firm of the group's eight member companies, is the fourth largest insurance company in California and ranks among the top 15 in the United States in accident and health insurance.

The organization recognizes an almost complete lack of landscaping around office buildings, which threatens to make the Wilshire Center business district something of another high-rise asphalt jungle, Mitchell said.

"Dr. James Hester, president of New York University, has said recently that Americans are learning that fleeing to the suburbs and allowing the central city to become run down can result in a social and economic cancer," Mitchell said. "It is much more realistic and useful to strengthen the central city, to enhance it, to beautify it, to make the city a positive influence, the

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BENEFICIAL PLAZA

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center of culture as well as of business," Mitchell added.

The front plaza will be a city block wide and will contain an acre of lawn. A grouping of Canary Island pines which have been growing in a Compton nursery will be transplanted to this area.

Bordering the walkways leading to the building's elevated entry area will be a hedge 20 feet wide and comprised of 2,000 Japanese evergreen yews. The yews, also being cultivated locally, were transplanted from Connecticut earlier this year. It is anticipated that from the air the semi-circular hedge will resemble a giant green horseshoe lying along Wilshire Blvd. It may well become another orientation point for incoming airline passengers somewhat like Hollywood Park, Century City and Inglewood Park Cemetery.

Plaza at Rear

The rear of the building will be landscaped to form a second plaza. Thirty trees will shade the sidewalks on Serrano, 7th and Oxford. Ten-foot-square sunken planters will accommodate annual flowers which will be changed four times a year.

Beneficial Plaza will have 380,000 square feet of floor space, with 30,800 square feet per level—something more than the area of the average office building floor.

Precast shocked concrete is the primary building material used by Dinwiddie Construction Co. under plans by Skidmore, Owings & Merrill, whose architects, Gordon Bunschaft and E. Charles Bassett, designed the structure. The building is 50% completed.

(Shocked concrete, discovered 30 years ago by a Dutch farmer, has a low water-to-cement ratio and is considered 250% stronger than conventional "wet" concrete. The shocking process consists of bolting a mold filled with layers of almost waterless concrete to a shocking table, raising the table 5/16th of an inch and dropping it 250 times a minute. When removed

from the mold and permitted to harden, a precast section can withstand up to 10,000 pounds of stress or pressure per square inch.

More than 750 T-shaped precast concrete units, weighing five tons each, are being used in the facade. Finished in a natural granite aggregate, two sections frame one window. Twenty-eight precast concrete columns, 14 feet high and weighing 14 tons each, are anchored in the lobby and support the building.

Largest in West

Rockwin Schokbeton Co. of Santa Fe Springs is supplying 5,800 tons of shocked concrete, making Beneficial Plaza the largest structure made of this material in the West.

The structure's core is reinforced by 3,500 tons of steel. There will be more than 50,000 square feet of solar bronze glass for the windows, which will be recessed five feet from the building line. Two types of marble will be used in the interior: verde ancient green in the main lobby and travertine in the elevator lobbies of the upper floors.

The garage will have 300,000 square feet and will accommodate 300 vehicles. Entrance to the garage will be by two ramps, each three lanes wide, from both Serrano and Oxford, leading underneath to the entry platform. A driveway for VIP's will permit unloading of passengers at the front door.

BIG's 600 employees will occupy four floors, and there will be a data processing center on the third floor. Among tenants already set for the new building are a major branch of United California Bank on the ground floor and a Manning's restaurant on the second level. The dining facilities will be open to the public and will seat 400. Completion of the building is set for January.

The building occupies land once exchanged (in 1882) by the Southern Pacific Railroad to Germain Pellissier at \$25 per acre for sheep grazing purposes. A generous portion of it, at least, is to become green again.

Insurance Co. Head Honored

Los Angeles last week honored Edward D. Mitchell, founder and chairman of the Beneficial Insurance Group, for his contributions to the beauty of the Wilshire area.

The City Council adopted a resolution commending Mitchell on planning BIG's \$16.7 million international headquarters, Beneficial Plaza, under construction at 3700 Wilshire Blvd.

At his insistence, the 380,000-square-foot home office building was placed 315 feet back from the boulevard and will be encircled by a 2½-acre park.

Councilman John Ferraro of the 4th District made the presentation of the resolution scroll to Mitchell on behalf of the city.