



August 13, 2009

Submitted by email

Mr. Jimmy C. Liao
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Environmental Review Section
Department of City Planning
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**Re: Notice of Preparation for an Environmental Impact Report
Century Plaza Development, ENV-2008-4950-EIR**

Dear Mr. Liao:

On behalf of the Los Angeles Conservancy, thank you for the opportunity to comment on the Notice of Preparation for the Century Plaza Development Environmental Impact Report (EIR). The Los Angeles Conservancy is the largest local historic preservation organization in the United States, with almost 7,000 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. Based on the exceptional architectural and cultural significance of the Century Plaza Hotel, we urge the city to mandate consideration of a range of potentially feasible alternatives to demolition in the Draft EIR.

I. The EIR Should Acknowledge That Century Plaza is a Historical Resource

In April 2009, the National Trust for Historic Preservation listed the Century Plaza Hotel as one of America's 11 Most Endangered Historic Places and, just last month, District 5 Councilmember Paul Koretz introduced a motion to nominate the hotel for Historic-Cultural Monument (HCM) designation.¹ Although HCM designation will definitively establish the hotel's significance under CEQA, formal listing by the city is not required for the hotel to be considered a historic resource in the Draft EIR. A property's potential eligibility for an historic register, rather than actual listing, is sufficient evidence for the city to consider that resource historic.²

¹ Council File No. 09-1676, July 7, 2009.

² *League for Protection v. City of Oakland* (1997) 52 Cal.App.4th 896, 908.

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.³ 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 above criteria, California Register-eligible properties must retain sufficient physical integrity to convey historic significance.⁴ For properties achieving significance within the past fifty years, such as the Century Plaza Hotel, the California Register also contains a Special (Criteria) Consideration which states “sufficient time must have passed to obtain a scholarly perspective on the events or individuals associated with the resource...to understand its historical importance.”⁵

Designed by Minoru Yamasaki and completed in 1966, the Century Plaza Hotel is eligible for listing in the California Register as the noted work of a master architect (criterion 3), an exemplar of 1960’s urban planning (criteria 1 and 3), a landmark in hospitality design (criterion 3), and as the site of national presidential and historic events (criteria 1 and 2).

Century Plaza’s Significance as the Noted Work of a Master Architect: Born in 1912 as a second-generation Japanese American (or Nisei) in Seattle, Washington, Minoru Yamasaki gained early recognition for his innovative domed design for the Lambert-St. Louis Airport Terminal (1956)—predating Eero Saarinen’s famous TWA Terminal (1962)—for which he won the American Institute of Architects First Honor

³ PRC § 5024.1; 14 CCR §§ 4850 et seq.

⁴ They need not retain all aspects of integrity, but only a sufficient degree of those aspects of integrity that relate to why it is significant. The California Register recognizes seven aspects or qualities that, in various combinations, define integrity, including location, design, setting, materials, workmanship, feeling, and association.

⁵ Under National Register criteria, a property that has “achieved significance within the past fifty years shall not be considered eligible...[unless] it is of exceptional importance.” Although the Conservancy strongly feels that Century Plaza is eligible under both California Register and National Register criteria, the California Register does not require a showing of “exceptional importance” for resources less than fifty years of age. See “California Register and National Register: A Comparison (for purposes of determining eligibility for the California Register),” California Office of Historic Preservation, Technical Assistance Series #6, March 14, 2006.

Award, the first of three such honors during his career. Subsequent commissions including a trio of projects at Wayne State University (1955-59), the U.S. Science Pavilion for the Seattle World's Fair (1962), and the Michigan Consolidated Gas Company Building in Detroit (1962) earned Yamasaki international acclaim on par with contemporaries such as Philip Johnson, I.M. Pei, and Edward Durell Stone.

Reacting against the stark “glass boxes” that had come to characterize modern architecture, Yamasaki introduced ornamentation, texture, and geometric shapes into his designs. Like Edward Durell Stone, Yamasaki frequently referenced historical architectural styles in his designs, such as the Gothic-inspired barrel vault arches at the U.S. Science Pavilion or the pointed arches at the ground floor of the World Trade Center. He believed that architecture should “give man an aesthetic, emotional fulfillment so that...he can anticipate with pleasure his arrival at this destination.”⁶ Although both criticized and praised for his more romantic designs, Yamasaki's work foreshadowed a shift against the austerity of modernism that would fully coalesce in the post-modernism of the 1970s and 1980s.

By the 1960s, Yamasaki's sense of beauty, surprise, and delight—elements he believed were essential in architecture—started to move beyond decorative ornament and into the “bones, the basic structure of a building.”⁷ The Century Plaza exemplifies this transition, with its curved edifice providing a sense of “an event, a fun thing” upon arriving at the hotel.⁸ Although Yamasaki's pointed arch motif is evident on the ground-floor windows of the hotel, it is the subtle play of light and shadow against the rhythmic regularity of the scooped-corner balconies and the recessed glass walls that enliven both sides of the façade.

At the time of the Century Plaza's design and construction, Minoru Yamasaki was at the peak of his career, with his firm's commission for the World Trade Center landing him on the cover of *TIME* magazine, one of only about a dozen architects to earn that distinction. For the World Trade Center project, the Yamasaki firm was selected over a highly distinguished group of competitors, including Walter Gropius' The Architects Collaborative, Welton Becket and Associates, and Philip Johnson. In the 1963 *TIME* profile, Gropius (“godfather of the Bauhaus School”) praised Yamasaki as “a highly talented man, full of ideas,” while Wallace Harrison, head of the design teams for such modernist icons as the United Nations headquarters and Lincoln Center for the Performing Arts, hailed Yamasaki's “fine sense of plan, of scale and what human beings need in a building.”⁹

In a career spanning three decades, Yamasaki and his Michigan-based firm designed over 250 buildings throughout the United States and internationally, including Dhahran Air Terminal in Dhahran, Saudi Arabia (1961); Woodrow Wilson School of Public and International Affairs in Princeton, New Jersey (1965); Temple Beth El in

⁶ Minoru Yamasaki, *A Life in Architecture*, New York: Weatherhill, 1979, p.30.

⁷ “The Road to Xanadu,” *TIME*, January 19, 1963.

⁸ “The Prestige Acropolis,” *TIME*, June 10, 1966.

⁹ “The Road to Xanadu.”

Birmingham, Michigan (1974); and the twin Century Plaza Towers (1975) across from Century Plaza Hotel. A tough critic of his own work, it is noteworthy that Yamasaki selected the Century Plaza as one of his thirty best designs, having featured the hotel in his 1979 monograph, *A Life in Architecture*.

The Century Plaza is not only important as the work of a master architect, but as an architectural statement that perfectly expressed the mood of the time, with its sweeping curve and rhythmic grid of beveled balconies conveying the exuberance and optimism of postwar Los Angeles. “In its architecture as well as the way it takes advantage of the Century City plan,” notes *Los Angeles Times* architectural critic Christopher Hawthorne, the hotel “is an unusually effective example of the attitude—more optimistic than utopian, more Camelot than Stanley Kubrick—that marked so much 1960s development in Los Angeles.”¹⁰ “Its size and breadth show the era’s boldness and confidence,” concurs *San Jose Mercury News* architectural critic Alan Hess, while “its newness shows the era’s innovative and progressive character.”¹¹

Century Plaza’s Significance as an Example of 1960s Los Angeles Planning:

The development of Century City played a key role in the city’s history of urban planning, with the 180-acre former 20th Century Fox studio back lot providing an enormous clean slate for realizing bold new planning principles. The Century Plaza Hotel was the fourth element constructed under Welton Becket’s Century City Master Plan, after Becket’s own Gateway Buildings, the adjacent open air shopping mall, and a pair of residential towers designed by I.M. Pei. These four components—office, retail, residential, and hotel—comprised the first phases of one of the largest ever privately funded development to create a modern live-work “city within a city” over the course of two decades.¹² The grandeur of Yamasaki’s design, with its curved edifice framing the elliptical fountains on Avenue of the Stars, captured the imagination of the city and created an instant landmark, with the hotel’s tremendous success fueling a second stage of development that firmly established Century City as a viable alternative city center node to downtown Los Angeles.

Despite the march of new development in Century City, the Century Plaza Hotel has endured as a rare example of the 1960s planning principles that informed its conception. Indeed, the hotel is one of the few surviving original elements of Becket’s master plan. As noted by Christopher Hawthorne, Century City is “among the purest representations of 1960s Los Angeles planning and architectural philosophy we have left,” with the Century Plaza Hotel retaining a “connection to place, context and planning

¹⁰ Christopher Hawthorne, “Century Plaza as L.A. statement,” *Los Angeles Times*, June 1, 2009.

¹¹ Letter from Alan Hess to the Department of City Planning, Environmental Review Section, City of Los Angeles, July 29, 2009.

¹² In 1958, Fox Studios decided to develop 180 acres of its underutilized back lot. Welton Becket and Associates was selected to design a master plan for what would be a planned community with commercial, residential, hospitality, medical, and retail components: a true city within the greater city of Los Angeles. After Fox divested itself from the project in 1960, the firm redesigned the plan to create a main boulevard called Avenue of the Stars modeled after the *Champs-Élysées* and, like all streets in Century City, named in honor of the burgeoning space program that defined the optimism and promise of a new century.

history rare among buildings of its relatively young age.”¹³ *San Jose Mercury News* critic Alan Hess concurs, adding: “The Century Plaza Hotel exemplifies central themes of architecture and urban planning as uniquely articulated in the 1960s throughout the United States,” illustrating “the decentralized urban form achieved in the suburban metropolis by the 1960s.”¹⁴

Century Plaza’s Significance as a Landmark in Hospitality Design: As described by *Architectural Record* in 1966, “The Century Plaza Hotel is a glamorous paradox, a luxury resort on a mid-city site, designed to attract conventions and large events without interfering with the relaxed atmosphere of a resort.”¹⁵ Standing nineteen stories tall on a six-acre site, the Century Plaza Hotel originally included 800 rooms on sixteen floors above grade, three acres of landscaped garden and resort amenities, and extensive conference and meeting space underground. Celebrated as “one of the most successful new hotels of this generation,”¹⁶ its guest rooms featured state-of-the-art amenities like color television, wall-mounted temperature controls, and a floor-to-ceiling wall of glass leading to private balconies with spectacular views of the mountains or ocean in the distance. Upon completion, the Century Plaza Hotel also had the largest ballroom in the west, with seating for up to 2,000 people, and remains one of the largest hotel convention centers in Los Angeles.

Yamasaki deftly addressed the dual programmatic needs of a luxury resort getaway and a convention and banquet center by utilizing the site’s natural slope to tuck the ballroom, meeting spaces, and other public amenities under the lobby level, thereby avoiding “the uninviting, blank-walled two- or three-storied structure often required for these facilities.”¹⁷ He then placed the pool terrace for hotel guests essentially as a roof garden over the ballroom. Hotel guests could make a glamorous entrance along the grand arcing driveway to the main entry canopy, while event goers had a separate driveway that led directly to the lower level spaces. The sunken plaza in front of the hotel offered pedestrian-oriented amenities such as shops, restaurants, and outdoor seating distinct from the resort-like garden and pool terrace. The plaza would later connect via a grand underground pedestrian concourse to the ABC Entertainment Center and Yamasaki’s own triangle-shaped Century City Towers across Avenue of the Stars.

By incorporating convention facilities into a luxury resort, the Century Plaza benefits from a diversified income stream that has enabled the hotel to adapt to changing trends over time and remain competitive. The variety of amenities found onsite, and planned to come with the entertainment center, signaled a transition toward multi-purpose hotel facilities with convention center, shopping, and entertainment uses that would emerge in the 1970s.

¹³ Hawthorne, “Century Plaza as LA Statement,” June 1, 2009.

¹⁴ Hess letter, July 29, 2009.

¹⁵ “Hotels, Motels, Resorts,” *Architectural Record*, August 1966, v. 140, n.2, p. 125.

¹⁶ Quotation attributed to Andrew B. Rawn, vice president of development for Century City, Inc. in “The Art of City Building,” *Los Angeles Times*, March 10, 1969.

¹⁷ Yamasaki, p.97.

Century Plaza’s Significance as the Site of National Presidential and Historic Events: In many ways, the Century Plaza Hotel tells the story of Los Angeles, and the nation, in the latter twentieth century. Forty years ago today, on August 13, 1969, President Richard Nixon, joined by members of Congress, state governors, and ambassadors from around the world, hosted the Apollo 11 astronauts at the hotel after their successful moon landing. The evening was hailed by the *Los Angeles Times* as “The Dinner of the Century,” “the dinner that welcomed astronauts back to Earth,” and “one of history’s most significant meals” at “one of the world’s finest hotels.”¹⁸

Since its opening in 1966, the Century Plaza Hotel has been a cultural touchstone for Los Angeles and the nation through its constant use by a unique cross-section of politics, entertainment, and society. As a favorite destination for U.S. presidents since Lyndon B. Johnson, the hotel was nicknamed the “West Coast White House.” Ronald Reagan held his two presidential victory parties at the Century Plaza and did much of his work in the hotel’s Presidential Suite while in California—from writing State of the Union speeches to meeting with world leaders and national security advisors to celebrating with the 1984 U.S. Olympic team. Not coincidentally, the hotel’s heavy use by national and world leaders has also made it a magnet for political activism, from Vietnam War protests in the late 1960s to a CODEPINK demonstration against the Iraq War in 2003. At the same time, the Century Plaza has hosted countless star-studded galas, charity functions, and awards shows.

II. Demolition of the Century Plaza Hotel Is Inconsistent With the *Greening of Century City Plan*

The applicant has cited the *Greening of Century City Plan* as inspiration for its proposed project—and by implication, as justification for the hotel’s demolition. Prepared in 2007 by Rios Clementi Hale Studios, the draft plan seeks to transform Century City “into a sustainable, walkable community for the twenty-first century” by recommending a series of improvements for streetscapes, wayfinding, programming, and public transit connections.¹⁹ Far from calling for Century Plaza’s destruction, the plan envisions the recently-renovated hotel as a centerpiece of the area’s transformation: “With...the renovation of the Century Plaza Hotel” and other retail, civic and residential projects “poised to come on line, this district...is on the verge of redefining itself as a vibrant, integrated community of residential, commercial business, retail, cultural, hospitality and entertainment uses.”²⁰ The *Greening Plan* includes detailed recommendations for strengthening pedestrian connections to the hotel, redefining its orientation to the street, and adding programming at the street level to better engage pedestrians. As illustrated in the plan, these improvements were intended to showcase and enhance the hotel, not destroy it.

¹⁸ “The Dinner of the Century,” *Los Angeles Times*, September 30, 1969.

¹⁹ Rios Clementi Hale Studios, *Greening of Century City Pedestrian Connectivity Plan*, May 3, 2007. See <http://cityplanning.lacity.org/Urbanization/GreenCentury21/TOC.pdf>.

²⁰ *Greening of Century City Pedestrian Connectivity Plan*, p.1.

Referencing the *Greening Plan's* goal to “develop a more sustainable Century City,” the proposed project purportedly “embraces the future of urban planning with an emphasis on pedestrian connectivity and sustainable design,” including green roofs and environmentally sensitive building materials.²¹ The new towers would also meet LEED certification standards, although already required under the city’s 2008 Green Building Ordinance.²² Certainly, it is not environmentally sustainable to demolish a fully functional, 800,000 square foot building that received a \$36 million renovation just over a year ago. According to the Notice of Preparation, demolition will take up to a year, followed by another fourteen months of excavation work, producing 479,000 cubic yards of material that will need to be hauled from the site. The Draft EIR should scrutinize any claimed environmental benefits of the proposed project within this context, taking into account the embodied energy that would be lost with the hotel’s destruction and additional resources needed to haul away nearly 64,000 tons of debris and erect two 49-story, 570-foot towers.²³

III. Project Alternatives

The California Environmental Quality Act “requires public agencies to deny approval of a project with significant adverse effects when feasible alternatives or feasible mitigation measures can substantially lessen such effects.”²⁴ CEQA Guidelines require that a range of reasonable alternatives be considered in the EIR, with an emphasis on options capable of “substantially lessening” the project’s significant adverse environmental effects. To that end, the Draft EIR for the Century Plaza Development should prioritize development of alternatives that avoid demolition of the Century Plaza Hotel, and the resulting loss to the city’s cultural heritage.

To ensure fair consideration of preservation alternatives, the Draft EIR should first assess the feasibility of the proposed project in terms of current zoning limits, the capacity of existing infrastructure, cumulative impacts (including of cultural and historic resources), sustainability goals, and the trip allocation for the site under the Century City North Specific Plan. In particular, the Draft EIR should include a clear accounting of the number of trips currently available for the Century Plaza site, and those needed to develop the proposed project, according to the table provided for the Cumulative Automobile Trip Generation Potential (CATGP) in the Century City North Specific Plan and/or subsequent amendments or other applicable methodology.²⁵

²¹ “How About Condos Instead of the Century Plaza Hotel?,” *Curbed Los Angeles*, December 18, 2008.

²² The applicant has stated its intent to seek LEED Silver rating, for which the city will provide added incentives such as expedited review from several agencies, as outlined in the city’s 2008 Green Building Program Ordinance. http://cityplanning.lacity.org/Code_Studies/GreenLA/greenbuildingordinance.pdf

²³ Embodied energy is the total energy that a product/design may be said to “contain,” including all energy used in growing, extracting, and manufacturing it plus the energy used to transport it to the point of use. The embodied energy of a structure includes the energy embodied in all of its components, plus the energy used in construction. David A. Gottfried and Lynn N. Simon, eds., *Sustainable Building Technical Manual*, Washington, DC: Public Technology Inc. and U.S. Green Building Council, 1996.

²⁴ *Sierra Club v. Gilroy City Council* (1990) 222 Cal. App.3d 30, 41; also see PRC §§ 21002, 21002.1.

²⁵ Century City North Specific Plan, Ordinance No. 156,122, effective November 24, 1981, Section 2.

In conjunction with initiating HCM designation of the Century Plaza, Councilmember Koretz has asked the applicant to work with the Conservancy to convene a community development charrette to develop potentially feasible alternatives to demolition for detailed consideration in the Draft EIR.²⁶ The Conservancy fully supports this approach and looks forward to participating in an inclusive, multi-disciplinary charrette process to identify options that both preserve the hotel and achieve a reasonable number of project objectives. Rather than propose specific alternatives at this time, the Conservancy believes that the charrette process should take precedence in informing the range of options to be considered in the Draft EIR. At minimum, however, the EIR should include at least one alternative that complies with the *Secretary of the Interior's Standards for Rehabilitation*.

Thank you for the opportunity to comment on the Notice of Preparation for the Century Plaza Development project. Please feel free to contact me at (213) 430-4203 or mbuhler@laconservancy.org should you have any questions.

Sincerely,



Mike Buhler
Director of Advocacy

cc: The Honorable Paul Koretz, Council District 5
National Trust for Historic Preservation
California Preservation Foundation
City of Los Angeles, Office of Historic Resources
Westside Neighborhood Council, Land Use Committee
Beverlywood Homes Association
Comstock Hills Homeowner Association
Holmby Westwood Property Owners Association
Tract 7260 Association
Westwood Hills Property Owners Association
Westwood Homeowner Association
Westwood South of Santa Monica Blvd. Homeowners Association

²⁶ "Above all, a preservation development charrette can identify feasible reuse solutions for an endangered property which may then result in its reuse or revitalization. By bringing together architectural, real estate, planning, political, and community leaders, the charrette can generate new ideas that are both practical and visionary." Jennifer Goodman, *How to Organize a Preservation Development Charrette*, Washington, DC: National Trust for Historic Preservation, 2000, pp.1-2.