April 25, 2011

Submitted electronically
craig.chalfant, City of Long Beach
Department of Development Services
333 West Ocean Boulevard, 5th Floor
Long Beach, CA 90802
craig.chalfant@longbeach.gov

Re: Recirculated Draft Environmental Impact Report – Second +PCH Project
(SCH#2009101014)

Dear Mr. Chalfant:

On behalf of the Los Angeles Conservancy, thank you for the opportunity to comment on the Recirculated Draft Environmental Impact Report (DEIR) for the Second +PCH project. The Los Angeles Conservancy is the countywide historic preservation organization for the Los Angeles area and is the largest local historic preservation organization in the United States, with over 6,000 members. Since 1984, the Conservancy’s all-volunteer Modern Committee has worked to raise awareness about Los Angeles’ unique collection of mid-20th century modernist structures. Based on the architectural and cultural significance of the Seaport Marina Hotel, we urge the city to consider the hotel a historical resource under CEQA and to mandate consideration of potentially feasible alternatives to demolition and mitigation measures that reduce impacts on historic resources in the Final EIR.

I. The Seaport Marina Hotel (Edgewater Inn) Qualifies As A 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. For properties achieving significance within the past fifty years, such as the Seaport Marina Hotel, the California Register also contains a Special (Criteria) Consideration which states that, “sufficient time must have passed to obtain a scholarly perspective on the events or individuals associated with the resource...to understand its historical importance.”

Designed by Roy Anthony Seally (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 hotel (criteria 1 and 3).

While studying architecture at the University of Southern California in 1939, Seally 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, Seally was profiled by in the August 1950 edition of Ebony magazine, “Architect for the Wealthy,” including an interview and photographs of several buildings he had designed.

Although he had worked as successful designer for nearly two decades, Seally did not obtain his California architect’s license until 1957. “During the 1960s,” notes the Draft EIR, “he was one of a small group of notable African American architects practicing in Southern California.” Among Seally’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 Seally’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 the Edgewater Inn) included 200 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

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1 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.” The California Register does not require a showing of “exceptional importance” for resources less than 50 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.
Bay Marina, the hotel catered to tourists driving along Pacific Coast Highway, boaters docked at the marina, conventioneers, 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 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 (as 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.

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

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.” Courts often refer to the EIR as “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 or avoid those impacts. Based on objective analyses found in the EIR, agencies “shall mitigate or avoid the significant effects on the environment... whenever it is feasible to do so.”

Under the current range of alternatives, only the No Project/No Development 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 (the hotel’s character-defining features are listed above and further depicted in Attachment A). We recommend and urge the City to evaluate at least one preservation alternative in the Final EIR, or modify one of the four Reduced Intensity Alternatives to adaptively reuse the existing hotel buildings to the greatest extent possible, while seeking to achieve most project objectives.

As 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).

The Conservancy and its Modern Committee hope to continue to work with the applicant to improve the project and reduce impacts on historic resources. Thank you for the opportunity to

3 Public Resource Code, Sec. 21001 (b), (c).
5 PRC §21002.1.
comment on the recirculated Draft EIR for the Second +PCH project. Please don’t hesitate to contact me at (213) 430-4203 or afine@laconservancy.org should you have any questions.

Sincerely,

[Signature]
Adrian Scott Fine
Director of Advocacy

cc: Long Beach Heritage