



January 9, 2017

Ms. Darlene Navarrete
Los Angeles City Planning Department
200 N. Spring Street
Los Angeles, CA 90012
darlene.navarrete@lacity.org

523 West Sixth Street, Suite 826
Los Angeles, CA 90014

213 623 2489 OFFICE
213 623 3909 FAX
laconservancy.org

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

Dear Ms. Navarrete:

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. The sophisticated design features a central grassy expanse with an off-center grove of Canary Island Pines framed by a U-shaped promenade and linked to the office tower by a plaza featuring patterned paving. Liberty Park was designed by Peter Walker, one of the nation's most prominent Modern landscape architects, whose projects include the recently completed National 9/11 Memorial in New York City.

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.

The subject property was only 41 years of age when evaluated the previous year and thus not considered for potential historic resource eligibility at that time. Additionally, SurveyLA has not undertaken any new surveys of the Koreatown area, meaning the subject property has yet to receive an actual evaluation that evaluates its eligibility for listing in the National or California Registers.

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

¹ PRC §21001 (b), (c).



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.

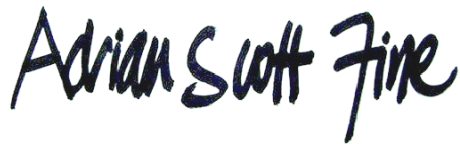
The Conservancy addressed our concerns on this flawed project review in both a comment letter and public testimony at the hearing officer meeting on December 7, 2016. The Conservancy additionally discussed these concerns with members of the Department of City Planning and with a representative from Council District 10 in mid-December .

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

