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December 5, 2017

Ms. Darlene Navarrete
Los Angeles City Planning Department
200 N. Spring Street
Los Angeles, CA 90012

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

Dear Ms. Navarette:

As an architect and historian of Los Angeles architecture, I would like to draw your attention to the significance of the Beneficial Life Building (1967) at 3700 Wilshire, which is about to turn fifty years old. It is due serious consideration because of its historic architectural character.

I write this as the author of nineteen books, most dealing with the history of Modern architecture in California and the West. I have written on architecture for *PlacesJournal*, *the Journal of the Society of Architectural Historians*, *Architectural Digest*, *The Architects Newspaper*, and other journals, and have been the architecture critic for the *San Jose Mercury News*. I have received awards for my work from the National Trust for Historic Preservation, the Los Angeles Conservancy, and Docomomo-US.

I can state unequivocally that the Mitigated Negative Declaration's (MND) statement that the proposed project for the site will have "no impact" on historical resources is unsubstantiated. The facts support exactly the opposite conclusion.

Among many factors that make the Beneficial building significant, I will highlight two:

1. The distinguished pedigree of its design architects, Gordon Bunshaft and Edward Charles Bassett of Skidmore, Owings & Merrill (SOM), and its landscape architect, Peter Walker (then of Sasaki Walker Associates.)
2. Its generous contribution to the high quality of architecture, landscape architecture, and urban space which have been integral to the success of Los Angeles' innovative Miracle Mile since its inception by A. W. Ross in the 1920s.

Skidmore, Owings & Merrill was one of the largest and most influential architecture firms in the United States in the midcentury. They were known for setting a standard for

Modern design that satisfied the demand for functionality as well as prestige for many of the country's largest corporations. The Beneficial Life building is an excellent example of this.

Architects of the caliber of Bunshaft and Bassett assured SOM's leading status. Gordon Bunshaft is known for major cultural and corporate landmarks, including Lever House in New York, the Beinecke Rare Book Library at Yale University, the Hirshhorn Museum in Washington, DC, Manufacturers Hanover Trust Branch Bank in New York, and the Lyndon Johnson Presidential Library in Austin, Texas.

Edward Charles Bassett was responsible for the Oakland/Alameda County Coliseum, the Mauna Kea Beach Hotel in Hawaii, the Louise M. Davies Symphony Hall in San Francisco, the Bank of America tower in San Francisco, and the Weyerhaeuser headquarters in Washington state.

In keeping with Bunshaft, Bassett, and SOM's other landmark buildings, the Beneficial Building is elegantly expressive of its structure, handsomely proportioned, and well detailed. This can be seen, for example, in the graceful curve of the structural columns as they meet the ground.

Peter Walker's long landscape architecture career has been just as distinguished, including his recent design for the high profile National 9/11 Memorial in New York. SOM's building is beautifully complemented by the large landscaped park and plaza fronting Wilshire, a generous and well-designed contribution of open space to the city. It displays all the hallmarks of high art Modernist landscape design, including its U-shaped promenade, asymmetrical plantings, podium, stairs, and corner sign/markers. Of course Bunshaft, Bassett, and Walker worked together closely to achieve this unified Modern spatial design.

Beneficial Life's decision to choose such sophisticated architects continued A. W. Ross' original intention that the Miracle Mile would rise to a high standard of architecture and planning.

Open space such as this cannot be considered wasted space. As Beneficial's president and his architects intended, well-designed green spaces are essential in urban areas. They are the lungs of the city, an antidote to urban claustrophobia. Note, for example, how the pairing of the Beneficial building and park and the Ahmanson Center's towers and courtyard directly across Wilshire forms a notable, even grand, urban open space along Wilshire. This is the high level of quality that Los Angeles deserves.

It is useful to note that this quality was carried throughout the Beneficial design. For example, the interiors for one tenant were designed by noted Los Angeles architect Paul Laszlo, and the Liberty Bell feature of the plaza was designed by Harper Goff, one of the chief designers of Disneyland.

With the neighboring Wiltern Building by Morgan, Walls & Clements, and the Ahmanson Center by Edward Durell Stone across the street, the Beneficial Building and Park forms an architecturally distinguished district. These buildings establish a model for good urban design that future architecture and planning decisions can follow with confidence.

As Los Angeles moves forward, it can maintain the standards of quality urban design that this building and the historic Miracle Mile embody. An EIR is essential to help guide any future decisions.

Sincerely,

A handwritten signature in black ink, appearing to read "Alan Hess".

Alan Hess

cc:

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