

IV. Environmental Impact Analysis

I.1. Cultural Resources—Historical Resources

1. Introduction

This section of the Draft EIR focuses on the Proposed Project's potential impacts on historical resources. The analysis is based on *The Convention and Event Center Project Historical Resources Assessment* (the "Historical Resources Assessment") prepared by, Chattel Architecture, Planning & Preservation, Inc. in November, 2011. The Historical Resources Assessment, which is incorporated herein by reference, is included in its entirety as Appendix S to this Draft EIR.

2. Environmental Setting

a. Regulatory Setting

Historical resources fall within the jurisdiction of several levels of government. The framework for the identification and, in certain instances, protection of historical resources is established at the federal and state levels, while the identification, documentation, and protection and regulation of such resources is typically undertaken by local governments. The principal federal, state, and local laws relating to historical resources include the National Historic Preservation Act of 1966, as amended which established the National Register of Historic Places; the California Environmental Quality Act (CEQA); the California Register of Historical Resources; and the City of Los Angeles Cultural Heritage Ordinance (Los Angeles Administrative Code, Section 22.130). Resources that are eligible under one or more of these laws are treated as historical resources under CEQA. See Section I.1 of Appendix G of this Draft EIR for a detailed discussion of the relevant Regulatory Framework regarding historical resources, including the evaluation criteria that are used under federal, state and local laws.

b. Existing Conditions

The following section provides a brief historical overview of the South Park neighborhood of downtown Los Angeles, followed by a history of the West and South Halls and background on the architects Charles Luckman and Pei Cobb Freed & Partners.

(1) Historic Context

(a) South Park

The Project Site is located in the South Park area of the Central Business District in downtown Los Angeles. Prior to 1950, the South Park district was dominated by automotive businesses, including auto sales, repair and parking lots. There were numerous flats, apartment buildings, and rooming houses intermixed within automotive uses. The area was also home to the California Hospital, which was established in 1887 at 15th Street and South Hope Street. Now California Hospital Medical Center, it was the first physician-owned and operated hospital in Los Angeles.

The Project Site had been principally occupied by the former Herald-Express building and a Southern California Rapid Transit District bus yard. By 1980, after the construction of the Los Angeles Convention Center (Convention Center), there were approximately 4,000 housing units in South Park. Most of these housing units were apartments and single room occupancy (SRO) hotels that served low income elderly persons, singles, or young families. At that time, the area was seen by Community Redevelopment Agency of the City of Los Angeles (CRA/LA) as having great potential as a new downtown residential community with 6,000 to 7,500 new dwelling units and retention of 2,000 existing dwelling units. While some residential structures were built, the area did not see much growth in housing stock until the construction of STAPLES Center and approval of the LA Sports and Entertainment District.

Other improvements to South Park included Grand Hope Park, which was completed in 1993. This was the first new major park in downtown Los Angeles in more than a century. The site incorporates a campus for the Fashion Institute of Design and Merchandising (FIDM) with public open space. Substantial commercial development also occurred in South Park in the 1980s, including International Tower, Chase Plaza, and the Los Angeles Branch of the Federal Reserve Bank of San Francisco. California Hospital Medical Center also constructed a new 276-bed hospital facility and additional medical offices and related spaces.

In 1999, the company that became Anschutz Entertainment Group (AEG) constructed STAPLES Center, a sporting and entertainment facility, on land owned by the City of Los Angeles. A specific plan, approved in 2001, established the Los Angeles Sports and Entertainment District, allowing for construction of L.A. LIVE.

For additional information, see the Historical Resources Assessment, Appendix S to this Draft EIR.

(2) Building Description

(a) Setting

The Convention Center includes two primary halls, the newer South Hall and the original West Hall. These two halls are connected by the Concourse Building that spans Pico Boulevard. STAPLES Center arena is located east of West Hall on Convention Center property. The L.A. LIVE entertainment complex is immediately to the north across Chick Hearn Court. The east side of Figueroa Street consists predominantly of surface parking lots. Gilbert Lindsey Plaza, which includes bus parking, fronts the West Hall and adjoining concourse along Figueroa Street with palm trees regularly planted along the street. Ficus trees in tree wells are planted closer to the building.

(b) Exterior West Hall

Because of its size, urban location, and surrounding buildings that have been added since the original construction of the Convention Center, the original configuration and exterior of the West Hall is difficult to view from the street level. As shown in the circa 1982 photograph provided in Figure IV.I.1-1 on page IV.I.1-4, rectangular in plan, the West Hall is composed of three distinct levels which step up. The ground level consists of parking; the tall, central, podium level provides access to the interior; and the roof level encloses the roof trusses. The parking level is generally open, giving the impression the podium is floating. The roof slightly overhangs the podium at the north and south elevations. While there is no fenestration, bays are articulated with columns on the exterior. Walls are clad in porcelain enamel panels, which are corrugated at the podium and smooth above.

The east elevation is almost entirely obscured from Figueroa by the glass and steel Concourse Building and STAPLES Center. There is no access to parking and the building mass is generally visible from the podium at this elevation. The elevation is split roughly in half by the Concourse Building. An outdoor dining area extends between the two bridges and is accessed by contemporary doors.

As shown in Figure IV.I.1-2 on page IV.I.1-5, the south elevation fronts on Pico Boulevard with pedestrian access to the podium from a series of monumental steps with runs separated by low shrubbery. A canopy, supported by metal piers and covered with porcelain enamel panels is centered along the south elevation and aligns with the steps leading to Pico Boulevard. Banks of doors camouflaged with corrugated metal line corner bays, as well as bays under the canopy. The west elevation has both pedestrian access to the podium, centered on the elevation, as well as vehicle access to ground level parking.

A view of the north elevation of the West Hall is provided in Figure IV.I.1-3 on page IV.I.1-6. The north elevation mirrors the south elevation with monumental steps leading



Photo taken circa 1982

Source: Chattel Architecture, Planning & Preservation, Inc., 2011.



Figure IV.I.1-1
West Hall - West Elevation (left) and South Elevation (right), view north



Source: Chattel Architecture, Planning & Preservation, Inc., 2011.



Figure IV.I.1-2
West Hall - South Elevation, view northeast



Source: Chattel Architecture, Planning & Preservation, Inc., 2011.



Figure IV.I.1-3
West Hall - North Elevation, view southeast from the podium

down from the podium to the sidewalk aligned with a canopy over exit doors and light wells with escalator access to the parking level. Paired glass doors are placed under an additional canopy immediately east of the longer, centered canopy. A flat roof with a low parapet wall and very little venting covers the upper levels. Mechanical equipment is located in a well on the podium level roof.

(c) Interior, West Hall

The plan of the West Hall is dominated by the Halls A and B with interior circulation spaces arranged roughly as a T to the east, maximizing the flow of people into and through the spaces. Halls A and B are high volume spaces, allowing for a second floor along the east. Fronted by the glass and steel addition, the double height west lobby is dominated by an escalator flanked by staircases. These halls can be opened up to form one space. Concession stands line the south wall of the lobby. A long bank of steel and glass doors with full length, wood handles gives access to the main halls.

Other interior features within the West Hall include the Petree Hall, an unadorned space located on the first floor in the northeast corner is the ballroom, a kitchen with tile walls and concrete floors on the first floor, concession stands on the first floor, a board room suite with ribbon windows on the second floor, restrooms on each floor, and an open parking garage with a concrete waffle-slab ceiling and concrete floor. For additional information regarding the interior of the West Hall, see Historical Resources Assessment, in Appendix S to this Draft EIR.

(d) Exterior, South Hall and Concourse Building

Pie-shaped in plan, the South Hall is set atop a concrete podium and presents windowless elevations above that are clad in square metal panels. The curve of the south and west elevations are painted green and follow the line of the adjacent elevated freeway. Concrete stairs along the east elevation provide for exiting on to Gilbert Lindsey Plaza. A view of the north and west elevations of the South Hall is provided in Figure IV.I.1-4 on page IV.I.1-8.

As shown in Figure IV.I.1-5 on page IV.I.1-9, the entrance is located at the northeast corner of the building and is punctuated by a glass-skinned tower facing the intersection of Pico Boulevard and Figueroa Street.

(e) Exterior, Concourse Building

The Concourse Building spans Pico Boulevard and terminates in a glass-skinned entry tower, mirroring that of the South Hall. As shown in Figure IV.I.1-6 on page IV.I.1-10, a series of four exterior stairs breaks up the otherwise unarticulated east elevation.



Source: Chattel Architecture, Planning & Preservation, Inc., 2011.



Figure IV.I.1-4
South Hall - North and West Elevations, view southeast



Source: Chattel Architecture, Planning & Preservation, Inc., 2011.



Figure IV.I.1-5
South Hall - Northwest Elevation Entry Tower, view southwest



Source: Chattel Architecture, Planning & Preservation, Inc., 2011.



Figure IV.I.1-6
Concourse Hall - East Elevation, view south

(f) Alterations

While there are hundreds of alteration permits for the Convention Center, it appears only minor alterations were made to the West Hall prior to construction of the South Hall and Concourse Building in 1993. The Concourse Building, in particular, obscured much of the eastern façade of the West Hall. Originally painted white and bronze, the West Hall was painted its distinctive blue color in 1993. After a tornado ripped through downtown Los Angeles in 1983 causing \$3 million in damage, the West Hall was repaired without significant alterations. In addition to removal of the original entrance, significant alterations on the interior of the West Hall include loss of the chandelier in the West Lobby. Historic photographs also show a mirrored north wall in the lobby. Other alterations have been made to accommodate changing requirements and technological improvements over time, including light fixtures in Halls A and B, and alterations to some restrooms.

Construction of the North Hall in 1981 did not materially alter the West Hall. In 1980, three temporary structures, referred to as “Bubbles,” were added to increase exhibit space. The more permanent North Hall was constructed in 1981 and added 98,500 square feet. The one-story steel structure of the North Hall included exhibition space, food concession, and restrooms. This additional space proved to be insufficient, as only two years later, five additional Bubbles were added.

For a more detailed description of the buildings, refer to the Historical Resources Assessment, which is included in its entirety as Appendix S to this Draft EIR.

c. Building History

Discussions on whether and where to construct a convention center in Los Angeles started in the 1950s. For many years, there was considerable disagreement on where a convention center should be located. Other sites under discussion were adjacent to Union Station; adjacent to the Civic Center on Bunker Hill south of 1st Street between Olive and Hope streets, which would have included a commercial tower above; adjacent to the Coliseum at Exposition Park where the Coliseum Commission was reportedly willing to construct a “modest exhibit center”; and Elysian Park near Dodger Stadium. While the Los Angeles City Council approved the Elysian Park site in March 1965, this location was abandoned after opposition fought against use of a public park for commercial purposes.

In 1966, the decision for a new convention center came down to the Bunker Hill site and the Pico-Figueroa site. The convention center proposed for the Bunker Hill site was designed by Welton Becket and Associates and would have included an estimated \$42 million auditorium, garage and hotel on land owned by the CRA/LA. The Pico-Figueroa site was selected. The winning proposal only included an auditorium and garage, for an

estimated cost of \$22 million. Designed by Charles Luckman and Associates with Samuel Moody Burnett as project architect, the City broke ground for the new convention center a year later. Painted with white and bronze, the West Hall was dedicated July 10, 1971. Later in 1971, it was estimated the final cost for the West Hall would be approximately \$90 million, which included not only design and construction costs, but also interest on bonds sold and surrounding street improvements.

(1) History of Convention Centers

Following World War II, public sector involvement in the convention industry increased as a result of tourism growth, increased economic activity, and urban renewal efforts. Accompanying rising levels of education was growth in the number of corporations with offices in multiple cities. As trade shows and corporate meetings became ubiquitous, demand for convention facilities increased. In order to attract growing numbers of conventions, cities incorporated convention center construction within urban renewal and redevelopment schemes, usually at the edge of core urban areas where space would be available for construction of large buildings with contiguous, flat-floor space. Los Angeles, like many other major cities, used public funds to build its convention center in coordination with redevelopment efforts.

In a progressively more competitive environment, cities competed with one another to host conventions and major events, seeking to gain advantage by planning for and constructing new facilities. Earliest post-war convention centers featured modern exterior designs with flexible, high volume interior spaces and moveable walls. Concrete was used extensively in the formal designs of such facilities as San Diego's Community Concourse (1964). Other facilities, including the Las Vegas Convention Center (1958), the Honolulu International Center (1964), and the Anaheim Convention Center (1967), all designed by Adrian Wilson, included campuses with multiple exhibition halls and domed arenas, unified by networks of landscaped pathways with pergolas and colonnades. Similar to the Los Angeles Convention Center, when constructed in dense, urban areas, convention centers often distinguished themselves as interventions in the built environment with impermeable walls and footprints occupying multiple city blocks.

Between 1964 and 1991, the number of American metropolitan areas with either publicly or privately funded and managed convention facilities increased from 167 to 205, and the number of conventions increased by 78 percent. Accompanying this development was diversification in the types of facilities constructed, including exhibition halls, convention centers, merchandise marts, and multipurpose centers.

Cities have continued to improve and modify convention centers to remain competitive by reconstructing, expanding, and renovating existing facilities to increase

useable space, update designs, and better integrate buildings within surrounding environments. To achieve these goals, new facility designs, including additions to existing buildings, frequently incorporate steel and glass, increased fenestration, and multiple levels. Similar to the expansion of the Los Angeles Convention Center, completed in 1993, other examples of convention center expansion include Honolulu's Hawai'i Convention Center (constructed in 1998 as an alternative to Hawai'i International Center), San Francisco's Moscone Center (expanded in 1991 and 2003), the San Diego Convention Center (constructed in 1989 as an alternative to San Diego Community Concourse and expanded in 2001), the Long Beach Convention Center (expanded in 1994), and the District of Columbia's Walter E. Washington Convention Center (reconstructed in 2003).

Precedent for construction of large convention centers with substantial square footage began in the late 1800s, during which large-scale conventions were held for political parties as well as for common interest. Technological and economic development during the Industrial Revolution contributed to increased demand for conventions. Trade shows and industrial fairs, including Chicago's World's Columbian Exposition (1893) and St. Louis' Louisiana Purchase Exposition (1904), were organized to showcase innovation. Architect Daniel Burnham's plan for the World's Columbian Exposition exemplified the City Beautiful Movement, which emphasized aesthetic beauty and civic virtue through the creation of monumental public buildings. Construction of convention centers aligns with the intent of Burnham's plan for the Chicago's World's Columbian Exposition. As products of collective efforts between municipal agencies and business leaders, these early expositions served to promote host cities and attract new businesses. As unemployment rates increased throughout the Panic of the 1890s, civic and business leaders saw conventions as opportunities to improve images of their cities, attract and retain businesses, and improve civic loyalty, leading to a new era of boosterism and culminating in the formation of convention and visitors bureaus throughout the country. In addition to communicating with professional, fraternal, labor, and trade associations, boosters sought opportunities to host large scale events like world's fairs.

Throughout the early 1900s, travel information bureaus were established throughout New England, New York, and the San Francisco Bay Area. Events like the 1912 Travel and Vacation Exhibition in New York further legitimized tourism and convention industries, allowing attendees to discuss techniques for promoting and branding their respective cities while collaborating to perfect the science of attracting and hosting conventions. In 1914, the Association of Convention Secretaries formed to further systemize convention execution. Numerous voluntary, service, and fraternal organizations were established, including Rotary International (1905), Kiwanis International (1915), and Lions Club International (1917), all of which hosted annual national conventions in different cities each year. Convention and visitor bureaus continued to grow, attracting hotel and restaurant owners who benefited from increased convention-related business. Such organizations

also advocated for enlarged government participation in recruiting tourists and for publicly financed construction of buildings specifically designed for conventions and exhibitions. Although most cities hosted conventions in municipal halls and auditoriums, convention center advocates argued that these facilities were too small to host large meetings. Likewise, hotels, such as Los Angeles' Biltmore Hotel (1923), San Francisco's Palace Hotel (1909), Chicago's Palmer House Hotel (1925), and New York's Plaza Hotel (1907), more often than not included meeting facilities. However, these spaces were typically too small to accommodate thousands of delegates attending political and fraternal conventions. Convention center advocates further argued that the cost of constructing such facilities would be too great for any single private entity or entrepreneur. Despite these advocacy efforts, municipal governments continued to leave tourism and convention concerns in the hands of convention and visitors bureaus.

(2) People associated with the Los Angeles Convention Center

In 1967, the City and County of Los Angeles established a joint powers authority, known as the Los Angeles Convention and Exhibit Center Authority. Its 15-member commission managed financing and construction of the Convention Center. The commission sold 50-year bonds to finance construction of the Convention Center.

Businessman Neil Petree (1898-1991), served three terms as the commission's president. One of West Hall's major spaces is named for him. In the late 1930s, Neil Petree was chairman of the Major Highway Development Committee for five years, helping plan the California freeway system. He was later president of the Automobile Club of Southern California. In his professional life, Neil Petree served as president of the Los Angeles-based furniture company Barker Bros. from 1938 to 1960, and as chairman of the executive committee from 1960 until his retirement in 1968.

Halls A and B were named for Mayor Sam Yorty. Citing his dedication to the construction of the Convention Center, the commission's motion read, "during his entire term as mayor, commencing in 1961, Sam Yorty has worked faithfully and effectively to develop the Los Angeles Convention and Exhibition Center and to prepare for its operation." A bronze bust of Sam Yorty sits outside the bank of glass doors.

In 1971, Byron A. Trimble was appointed the first director of the new convention center. He served for two years, handing the position to Dick Walsh (1925-2011) in 1973, who served as general manager of the Convention Center for 23 years. Prior to this position, he was the former Los Angeles Dodger Vice President, Commissioner of the North American Soccer League, General Manager of the California Angels, and General Manager of numerous convention centers.

In 1957, Dodgers President Walter O'Malley named Dick Walsh President of the Pacific Coast League Los Angeles Angels. As a representative of the Dodgers, Walsh played an integral role in the team's arrival in Los Angeles for the 1958 season. In 1960 he was named Dodgers Vice President of Stadium Operations. He is credited with formulating and implementing countless ideas in the development and construction of Dodger Stadium, which opened in 1962. He was in charge of stadium operations through the 1966 season. Walsh became Commissioner of the North American Soccer League in 1966. In 1968 Gene Autry hired Walsh as Executive Vice President and General Manager of the California Angels, a position he held for three seasons.

After leaving his position at the Convention Center, Dick Walsh became the General Manager of the Hawaii Convention Center in 1997. Three years later he was named the senior general manager, overseeing five facilities in Anchorage and Fairbanks, Alaska. Later he was general manager of the Ontario, California Convention Center, retiring in 2005, one month before his 80th birthday.

(3) Major Events

The California Gift Show was the first show at the Convention Center, followed by the Southern California Boat Show and WESTEC, a technology exhibition put on by the Society of Mechanical Engineers. Major events that garnered significant attention in press included the Jerusalem Fair in November 1972 in commemoration of Israel's 25th anniversary. During the height of the Cold War in 1977, the Soviet National Exhibition was attended by 310,000 people. Concurrently, the Jewish Federation Council of Los Angeles held an exhibit on the second floor depicting the plight of Soviet Jews, which was attended by 62,000 people. In 1978, the Greater Los Angeles Auto Show moved to the West Hall, becoming the largest annual consumer show, attracting large crowds and national media. In 1984, the West Hall served as the Main Press Headquarters for 8,000 journalists covering the Games of the XXIII Olympiad. During this time, the West Hall was fully staffed round the clock, 24 hours a day.

Other interesting events included an auction in 1983 where Christie's sold 140 vintage toy cars and 39 collector's cars over two days. IBM held their annual meeting in 1984 at the West Hall, where John R. Opel, chairman, acknowledged Apple Computer's success in the personal computer market and announced improvements in IBM's product. Christie's held another auction in 1987 of Liberace's personal effects, including custom cars, mirrored pianos, and gold candelabrum. The National Education Association, the nation's largest teachers' union, held their annual convention in 1987, where Mary Hatwood Futrell was elected to an unprecedented third term as president of the organization. Finally, in a mass swearing-in ceremony, 1,300 ethnic Chinese became U.S. citizens on December 16, 1988, commemorating 200 years of immigration from Asia. "Never before... had so

many people of a single ethnicity become American citizens at the same time in the same place.”

After construction of the South Hall and the Concourse Building in 1993, it is difficult to determine the location where specific events were held.

(4) Charles Luckman (1909–1999)

Trained as an architect at University of Illinois at Champaign/Urbana, Charles Luckman is best known as president of Pepsodent, one of the most popular toothpaste brands prior to the 1950s as a result of his aggressive advertising campaigns. Charles Luckman’s aspirations were focused on architecture at an early age, influenced by the Muehleback Hotel in his hometown of Kansas City, Missouri.

Charles Luckman began his professional life after graduating from the university during the depths of the Great Depression. Unable to find work as an architect, he took a job in the advertising department of the Colgate-Palmolive-Peet Company in 1931. Shortly thereafter he was transferred to the sales department selling Palmolive soap. He achieved impressive gains in sales of the company’s soap on Chicago’s South Side, which earned him a reputation as a superb salesman.

His success at Colgate led to an offer from the Pepsodent Company, which he joined as sales manager in 1935. His marketing techniques at Pepsodent were credited with quadrupling the company’s profits. Charles Luckman quickly climbed the corporate ladder at Pepsodent, becoming vice-president in charge of sales in 1936, promoted to executive vice-president in 1941, and finally president in 1943. By the end of 1943, Pepsodent announced an annual gross income of \$3 million, boasting the largest sales of toothpaste in the United States. Charles Luckman’s salary of \$100,000 per year, in addition to holding 10 percent of Pepsodent’s stock, was a remarkable sum for that time.

The success of Pepsodent is credited to Charles Luckman’s understanding and manipulation of advertising. Among his advertising campaigns, Pepsodent sponsored the radio show Amos ’n Andy. As part of this advertising campaign, Pepsodent held a baby-naming contest for Amos’ wife Ruby, which prompted sales of Pepsodent to jump 21 percent.

In 1944 Lever Brothers acquired Pepsodent for \$15 million. Charles Luckman received \$1,500,000 for his stock in the deal, continuing in his role as president and becoming vice president of Lever Brothers, the United States branch of the international corporation Unilever. Just two years later, he became president of Lever Brothers in the United States with a salary of \$300,000. At the age of 37, Charles Luckman was now the

head executive of one of the country's largest corporations, and one of the country's youngest executives. He was nationally recognized with a feature on the cover of *Time* magazine as the "Boy Wonder of American industry."

While at Lever Brothers, Charles Luckman moved company headquarters from Cambridge, Massachusetts to Midtown Manhattan. As his pet project, Charles Luckman hired Gordon Bunshaf from the Chicago architectural firm of Skidmore, Owings and Merrill to design a 24-story, glass curtain wall building in the International Style, called Lever House. Completed in 1952, it was the first curtain wall skyscraper in New York City, paving the way for other corporate headquarters nearby on Park Avenue. Charles Luckman credits himself for directing the architects to make the entire ground-floor area of the building an open, public, landscaped plaza, a novel idea at the time because it meant losing profitable revenue from retail space. Both the glass curtain wall and setting within a landscaped plaza established a trend for skyscrapers that followed.

Charles Luckman did not see completion of Lever House in 1952 during his tenure. In a move that made headline news, he resigned from Lever Brothers in 1950 after a meeting with the directors of Unilever, the parent company, in which they had a disagreement over production of a synthetic soap.

Following his resignation, Charles Luckman received an invitation from William Pereira, his former classmate at University of Illinois, to form a Los Angeles-based architecture firm. Charles Luckman's renewed interest in architecture was stimulated, in part, by his participation in the design and construction of Lever House. Although the partnership lasted less than a decade, the architectural firm, Pereira & Luckman, was quite successful, due in part to Charles Luckman's understanding of marketing techniques. Charles Luckman writes in his memoir, "I thought that Bill and I would have something unique to sell to clients: the partnership of an architect and a businessman. As a former top executive, I could talk to clients on their level, and Bill as a first-rate architect could deliver what I could sell." Pereira & Luckman rapidly grew to national stature with offices in both Los Angeles and New York. By 1955, Pereira & Luckman had 400 employees and more than \$500 million in projects in progress. With promises that projects would always come in within budget, Pereira & Luckman are responsible for the designs of CBS Television City in the Fairfax neighborhood of Los Angeles (1952), Robinson's Department Store in Beverly Hills (1952), Disneyland Hotel (1958), the "Theme Building" at Los Angeles International Airport (with others, 1958, City Historic-Cultural Monument #570), United States Air Force and Naval Base in Cadiz, Spain (1956), and Nellis Air Force Base in Las Vegas (1957).

William Pereira and Charles Luckman split in 1958 over a disagreement between approaches in architectural and marketing practices. William Pereira said afterward, "the

businessman who hires us doesn't need another businessman to do the work; he needs an architect. It was like working in a factory... I just know I wasn't doing my best."

Charles Luckman reorganized his firm as Charles Luckman Associates (CLA). By 1968 CLA had become one of the five largest architectural firms in the United States, with offices in New York, Los Angeles, and Phoenix. His firm's work included master planning, engineering and architecture. Projects included Boston's Prudential Center (1960-1964), NASA's manned flight center in Houston (1962-1963), and Madison Square Garden in New York (1968). Charles Luckman is known for his work at Madison Square Garden as the site was then occupied by Pennsylvania Station, which spurred protests from the nascent architectural preservation movement. In southern California, CLA was responsible for the designs of the Los Angeles Zoo (1966), Arco Center Towers in Long Beach (1983), the Forum in Inglewood (1967), as well as the Convention Center West Hall (1971). In 1977, Luckman retired and direction of the firm passed to his son, James Luckman, although Charles Luckman continued to be an active presence. The firm was reorganized into an employee-owned partnership and became known as the Luckman Partnership, with a single head office in Los Angeles.

Charles Luckman had his architectural critics. Reflecting his strong business background, he marketed his firm as one that would design projects to suit the client's tastes and needs, rather than create designs based only on the vision of the architect.

Charles Luckman brought to architecture his business acumen and flair for showmanship. He once told a writer for *The New Yorker*, "I am firm in my belief that architecture is a business and not an art." This was music to the ears of corporate executives, government officials, and civic leaders more accustomed to dealing with businessmen than sparring with the artistically committed leaders of the Modern movement.

The Convention Center is an example of this as Luckman never claimed to have created a masterpiece of architecture with it. Rather, he said the firm "focused our creative efforts on the inside of the building and how it would function." A key example is how Luckman and his research team studied large convention centers and exhibit halls across the country and discovered that it took eight days to set up the exhibit and seven days to tear it down for every ten days that the exhibit was open. Their solution was to cut exhibit set up and tear down time to eight days instead of fifteen in order to maximize profits. To accomplish this, 25-foot wide automatic garage doors were installed at the exhibit floor, allowing trucks to drive directly onto the ground floor. In addition, the steel truss system enabled the main halls to have an almost column-free interior, which increased the rentable space by 34 percent. This usable space could be divided by motorized sliding walls into separate smaller spaces to house two or more smaller exhibits simultaneously. The

exterior plaza with a 60-foot wide circular fountain and Venetian glass chandelier in the West Lobby were among the only concessions to decoration.

An active supporter of public education, Luckman served on the California State University Board of Trustees from 1960 through 1982, twice serving as chair of the board. Notable during this tenure was his strong stand against campus unrest of the 1960s. He also established teaching awards at different universities. In 1994 Luckman donated \$2.1 million to establish the Charles and Harriet Luckman Fine Arts Complex at California State University, Los Angeles.

(5) James Freed (1930–2005)

James Ingo Freed joined the firm that became known as Pei Cobb Freed & Partners in 1956, only three years after completing his architectural degree at the Illinois Institute of Technology. Prior to joining the firm where he was to work for the remainder of his career, Freed briefly worked in the office of Ludwig Mies van der Rohe, where he contributed to the Seagram Building in Midtown Manhattan. In addition to the South Hall and Concourse Building, Freed's major works include the United States Holocaust Memorial Museum on the Mall in Washington, D.C. (1993); the Ronald Reagan Building and International Trade Center, also in Washington (1998); the Jacob K. Javits Convention Center in New York (1986); and the San Francisco Main Public Library (1996).

Freed did not have a specific style and it was not uncommon for Pei to take credit for his designs in the press. As noted in his obituary in the *New York Times*, "Freed took a singular approach to each project. The ethereal Air Force memorial is as distinct in style from the brooding Holocaust museum as these memorials are from the intricately faceted Javits Center, which differs, in turn, from the Beaux-Arts solidity of the San Francisco Main Public Library."

Freed's reputation for designing convention centers was solidified with his innovative design for the Javits Convention Center, which "transformed the traditional notion of a convention center from a large windowless box" to one sheathed in glass." Architectural critic Paul Goldberger compared the Javits Convention Center to "the great crystal palaces of the 19th century, those vast piles that were at once larger than anything else around them and lighter in appearance than a small cottage." Freed translated a similar idiom to his design of the South Hall and Concourse Building, using glass towers to bring light into what typically is a closed box. A critique in the *Los Angeles Times*, shortly after the South Hall and Concourse Building were completed, stated, "These lobby towers also serve to articulate the Convention Center's long, low frontage on Figueroa. Flanked by external fire escape stairs enclosed in nautical railings, the towers look rather like the smokestacks of an ocean liner docked alongside the street."

3. Environmental Impacts

a. Methodology

The Historical Resources Assessment prepared by Chattel Architecture is the first known assessment evaluating the West Hall, South Hall, and the Concourse Building as potential historical resources under federal, state, and local eligibility criteria. Primary documents utilized for the Historical Resources Assessment regarding construction were made available by the Convention Center. These items included a select number of the original drawings for the West Hall by Charles Luckman and Associates, a timeline, and historic photographs. In addition, primary research materials were consulted at the online image collection at the Los Angeles Public Library, the historical *Los Angeles Times* article database, UCLA Air Photo Archives, and Julius Shulman's photographs held at the Getty Research Institute. Building permits were consulted at the Los Angeles Department of Building and Safety. Not available was a complete list of events.

b. Thresholds of Significance

Appendix G of the CEQA Guidelines provides a set of sample questions that address impacts with regard to cultural resources. These questions are as follows:

Would the project:

- Cause a substantial adverse change in the significance of an historical resource as defined in §15064.5?

In the context of the above questions from Appendix G of the CEQA Guidelines, the *City of Los Angeles CEQA Thresholds Guide* states that a project would normally have a significant impact on historical resources if it would result in a substantial adverse change in the significance of an historical resource. A substantial adverse change in significance occurs if the project, among other things, involves:

- Demolition of a significant resource;
- Relocation that does not maintain the integrity and significance of a significant resource;
- Conversion, rehabilitation, or alteration of a significant resource which does not conform to the Secretary of the Interior's *Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings*; or
- Construction that reduces the integrity or significance of important resources on the site or in the vicinity.

Based on this CEQA Guidance and as concurred by the City of Los Angeles Department of City Planning's Office of Historic Resources, the relevant threshold for determining if the Proposed Project would have a significant impact on historic resources is whether:

- The Proposed Project would demolish, destroy, relocate, or alter a historical resource such that eligibility for listing on a register of historical resources would be lost (i.e., no longer eligible for listing as a historical resource); or
- The Proposed Project would reduce the integrity or significance of important resources on the Project Site or in the vicinity.

c. Project Design Features

No Project Design Features are proposed that are specific to this analysis of historical resources.

d. Project Impacts

(1) Significance Evaluation

As determined in the Historical Resources Assessment, the West Hall, South Hall, and Concourse Building do not appear eligible for listing in the National Register, California Register or local designation under any criteria. As described above, the West Hall has not been demonstrated to be associated with events that have made a significant contribution to the broad patterns of our history.¹ While the West Hall hosts and has hosted many events each year since 1971, none appear to rise to a level of significance. Exhibits such as the Soviet National Exhibition, and events, such as the swearing-in ceremony of 1,300 ethnic Chinese are interesting, but they reflected, rather than influenced, broad patterns of history. Furthermore, completed in 1971, the building was not one of the first or one of the largest post World War II convention centers; it simply reflected the trend in major cities in the United States to construct large, open flexible space to serve the growing convention trend.

¹ As set forth as Criterion A of the National Register, and Criterion 1 of both the California Register and the City of Los Angeles Cultural Heritage Ordinance.

The West Hall has not been demonstrated to be associated with lives of persons important in our past.² Although the West Hall is closely associated with both Neil Petree and Dick Walsh, neither individual appears to rise to the level of importance to warrant eligibility under this criterion. While Halls A and B are named for Mayor Sam Yorty, the West Hall is not the location most closely associated with him, or particularly associated with him at all.

The West Hall does not embody the distinctive characteristics of a type, period, region, or method of construction, nor does it represent the work of an important creative individual.³ Even when it was built, architectural critics described the West Hall as “a building of no special or consistent character.” Designed in the mid-1960s, the architectural style is unoriginal and commonplace. The only distinctive feature of the building is its large size. And even its size and the ability to see large portions of the West Hall have been diminished over the years with construction of adjacent buildings, such as the South Hall and Concourse Building, the STAPLES Center, and most recently, L.A. LIVE.

In addition, it has not been shown that Charles Luckman, or his firm, were significant architects. Like the West Hall, their body of work overall is derivative and uninspired. It could be argued that Charles Luckman’s most important work was Lever House in New York. As the design for Lever House is attributed to Gordon Bunshaf, it is unclear what contribution Charles Luckman made to it. Generally lacking in imagination, CLA designs can only be characterized by following trends of popular architectural styles of their time. In fact, most of CLA designs appear to be stuck in the same era when Lever House was designed. No additional information could be located on Samuel Moody Burnett, the project architect for the West Hall. It can be inferred that he spent his life working in large architectural firms.

Finally, the West Hall cannot be reasonably expected to yield information important in prehistory or history.⁴ Historical photographs of its construction show the site has been redeveloped numerous times.

² As set forth as Criterion B of the National Register, and Criterion 2 of both the California Register and the City of Los Angeles Cultural Heritage Ordinance.

³ As set forth as Criterion C of the National Register, and Criterion 3 of both the California Register and the City of Los Angeles Cultural Heritage Ordinance.

⁴ As set forth as Criterion D of the National Register, and Criterion 4 of the California Register.

As the South Hall and Concourse Building are significantly less than 50 years of age, they must be of exceptional importance in order to be eligible for the National Register.⁵ Furthermore, there is a similar rule for the California Register for properties that are less than 50 years old.⁶ For both the National Register and California Register, there must be sufficient scholarly research to determine the significance of the resource.

It does not appear sufficient time has passed nor has there been scholarly evaluation of the South Hall and Concourse Building. While reviews appeared in scholarly journals at the time the South Hall and Concourse Building were completed, no scholarly articles have appeared since that time. Furthermore, there has been no critical retrospective of James Freed's work since his death and therefore it is not possible to determine his importance to twentieth century American architecture. The South Hall and Concourse Building have not been demonstrated to be associated with events that have made a significant contribution to the broad patterns of our history. No events stand out as exceptionally significant and 18 years is too short a time to provide sufficient historical perspective. Likewise, the South Hall and Concourse Building have not been demonstrated to be associated with lives of persons important in our past. Based on design concepts explored at the Javits Center, the South Hall and Concourse Building do not develop any of these ideas further. James Freed, while a partner in an important architecture firm, is best known for his designs of the Javits Center and United States Holocaust Memorial Museum. Therefore, the South Hall and Concourse Building do not possess high artistic value nor represent the work of a master. Finally, the South Hall and Concourse Building cannot be reasonably expected to yield information important in prehistory or history.

⁵ *Resources that are less than 50 years old may be eligible under the special consideration of properties that have achieved significance within the past 50 years under Criteria Consideration G. National Register guidance states, "A case can more readily be presented and accepted for a property that has achieved significance within the past 50 years if the type of architecture or the historic circumstances with which the property is associated have been the object of scholarly evaluation. See Marcella Sherfy and W. Ray Luce, National Register Bulletin, "Guidelines for Evaluating and Nominating Properties that Have Achieved Significance within the Past Fifty Years," U.S. Department of the Interior, National Park Service, 1990, www.cr.nps.gov/nr/publications/bulletins/nrb22/, accessed on December 4, 2006. At 40 years of age, West Hall is not considered under Criteria Consideration G as it is nearing the minimum age requirement of the National Register. It is common to evaluate properties 45 years of age for National Register eligibility. Nonetheless, the Historical Resources Assessment evaluated the eligibility of the West Hall.*

⁶ *California Office of Historic Preservation, Technical Assistance Series #7, "How to Nominate a Property to the California Register of Historical Resources," states that "In order to understand the historic importance of a resource, sufficient time must have passed to obtain a scholarly perspective on the events or individuals associated with the resource. See ohp.parks.ca.gov/pages/1069/files/07%20cal%20reg%20how%20to%20nominate.pdf, accessed on March 21, 2012.*

(a) *Integrity*

As described in detail in the Regulatory Framework included in Appendix G, for a property to be eligible for listing in the National Register or California Register, it must retain several, and usually most, of its seven aspects of integrity. These aspects of integrity are location, design, setting, materials, workmanship, feeling, and association. In addition, historical resources may not retain sufficient integrity to meet the criteria for listing in the National Register, but they may still be eligible for listing in the California Register. While integrity generally is not assessed without first establishing historical significance for either an individual building or potential historic district under one of the four basic criteria, an assessment of integrity is included here to further demonstrate that the West Hall, South Hall and Concourse Building do not appear eligible for listing at any level—federal, state, or local—under any criteria.

Although the West Hall retains integrity of *location* and *association*, its integrity of *design* has been greatly compromised by construction of the Concourse Building, specifically the tower, which completely obscured the main entrance and east elevation. The *setting*, which is defined in part as relationships between buildings and other features or open space, was also compromised when the fountain and plaza fronting the West Hall was replaced with construction of the Concourse Building. Integrity of *materials*, the physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration, and *workmanship*, or evidence of artisans' labor and skill in constructing or altering a building, have also been compromised by Concourse Building. Because of these changes, the *feeling*, or presence of physical features that, taken together, convey the area's original character, is no longer present. Therefore, even if the West Hall were found to be significant, it does not retain integrity due to construction of the South Hall and Concourse Building.

(2) Nomination and Designation of Historical Resources

As summarized above and described in greater in the Regulatory Framework in Appendix G to this Draft EIR, the National Register California Register provide the opportunity for nomination of properties. While owner consent is required for listing in these Registers, the California State Historical Resources Commission, without owner consent, may determine that resources are eligible for listing in the California Register and may recommend that the Keeper of the National Register determine eligibility for the National Register. Further, nominations of properties are allowed under the City's Cultural Heritage Ordinance where owner consent is not required. If any portion of the Project Site were to be determined eligible under any of these processes, CEQA would require the demolition of the West Hall to be treated as constituting a significant adverse effect, notwithstanding the conclusions in the Historical Resources Assessment that there are no historical resources within the Project Site

Conclusion

As described in detail in Section II, Project Description, of this Draft EIR, the Proposed Project would provide for the modernization and expansion of the Convention Center and the creation of a multi-purpose event center. To provide for the proposed improvements, the West Hall would be removed.

As described above, the West Hall, South Hall and Concourse Building do not appear eligible for inclusion in the National Register, California Register, or as a local HCM under any criteria. As no significance has been established, there is no need to apply the exceptional significance criteria. Based on results of the Historical Resources Assessment, demolition of the West Hall to accommodate construction of a new Events Center would not result in a significant impact to historical resources under CEQA.

However, it is possible that a commission with jurisdiction, such as the California State Historical Resources Commission or the Los Angeles Cultural Heritage Commission, could determine the West Hall eligible for the California Register, the National Register, or as a local HCM. If any such determination were to be made, a significant impact would occur as a result of demolition of the West Hall.

4. Cumulative Impacts

As discussed above, based on the *Historical Resources Assessment*, the Project Site does not include any buildings that appear eligible for inclusion in the National Register, California Register, or for local HCM under any criteria. Nonetheless, it is possible that a commission with jurisdiction, such as the California State Historical Resources Commission or the Los Angeles Cultural Heritage Commission, could determine the West Hall eligible for the California Register, the National Register, or as a local HCM. If any such determination were to be made, a significant impact would occur as a result of demolition of the West Hall and to the extent that the related projects would affect a historical resource, cumulative impacts would also be potentially significant.

5. Project Design Features and Mitigation Measures

a. Project Design Features

No project design features are proposed with regard to historical resources.

b. Mitigation Measures

As discussed above, based on the *Historical Resources Assessment*, the Project Site does not include any buildings that appear eligible for inclusion in the National Register, California Register, or for local HCM under any criteria. Nonetheless, due to the potential for a significant impact, as described above, the following mitigation measure is proposed to reduce this potential impact:

Mitigation Measure I.1-1: Recordation. Prior to issuance of a demolition permit for the West Hall, photographic documentation noting the exterior elevations and interior features of the West Hall shall be conducted. Photographs shall be 35 mm, black and white taken by a professional photographer familiar with the recordation of historical buildings. Archival copies of the photographs along with existing drawings of the West Hall should be submitted to the Los Angeles Public Library, Central Library.

6. Level of Significance After Mitigation

As discussed above, based on the Historical Resources Assessment, the Project Site does not include any buildings that appear eligible for inclusion in the National Register, California Register, or for local HCM under any criteria. However, as set forth above, it is possible that a commission with jurisdiction, such as the California State Historical Resources Commission or the Los Angeles Cultural Heritage Commission, could determine the West Hall eligible for the California Register, the National Register, or as a local HCM. If any such determination were to be made, a significant impact would occur as a result of demolition of the West Hall. Implementation of the mitigation measure above would minimize this impact. However, this impact would remain significant and unavoidable.