

Appendix FEIR-B



Review of Public Comments on
DEIR Historic Resources Analysis

CONSULTING



MEMORANDUM

Date: July 18, 2017
Project: 2nd & PCH Project
For: Ashley Rogers, Eyestone Environmental
From: Teresa Grimes
Subject: Review of Public Comments on DEIR Historic Resources Analysis

GPA Consulting prepared the Historical Resource Evaluation Report (HRER) for the Edgewater Inn Marina Hotel at 6400 E. Pacific Coast Highway in the City of Long Beach. The HRER was prepared for and appended to the Draft Environmental Impact Report (DEIR) for the 2nd & PCH Project. Long Beach Heritage (LBH) and Los Angeles Conservancy (LAC) submitted comment letters regarding the DEIR, focusing on the Edgewater Inn Marina Hotel (now called the SeaPort Marina Hotel) as a potential historic resource. This memorandum responds to those comments pertaining to the historic resources evaluation provided in Section IV.C, Cultural Resources, of the DEIR, which was based on the HRER.

The Edgewater Inn Marina Hotel was evaluated in the HRER using the National Register of Historic Places (National Register), California Register of Historical Resources (California Register), and Long Beach Landmark criteria. GPA included photographs of the property in the HRER to document and illustrate the existing conditions. We did not manipulate the photographs to worsen the appearance of the property as suggested by LBH. The primary contexts and themes considered in the HRER were derived from the City of Long Beach Historic Context Statement and included economic development and architecture. After careful research and evaluation, GPA concluded that the property does not appear to be individually eligible for listing in the National Register, California Register, or as a Long Beach Landmark due to a lack of significance. Therefore, the property is not a historical resource as defined by California Environmental Quality Act (CEQA).

LBH and LAC argue in their comment letters that the property is architecturally significant as an example of the work of Roy Anthony Sealey and the Googie style. The LBH comment letter does not specifically refer to the criteria for architectural significance under national, state, or local landmark designation programs. Properties may be eligible for listing in the National and California Registers under criterion C/3 and for designation as Long Beach Landmarks under criterion C if they "represent the work of a master" or "embody the distinctive characteristics of a type, period, or method of construction."¹ The LAC comment letter refers to the California Register criteria, but does not support their opinion of eligibility with substantial evidence.

¹ National Register criteria, Title 36 Code of Federal Regulations Part 60.4; California Register criteria, Title 14 California Code of Regulations Section 4852; and Long Beach criteria, Chapter 2.63.060 Long Beach Municipal Code.



The National Register, upon which the California Register and Long Beach Landmark criteria are based, defines a master as "a figure of generally recognized greatness."² LBH and LAC do not explicitly claim that Sealey was considered a master architect. They both indicate, as does the HRER, that he was one of the few African Americans who found success in the field of architecture during the postwar period in Southern California. LBH and LAC refer to Sealey as a "prominent" and "noted" architect, respectively; however, neither LBH or LAC offers any information to suggest that Sealey was "a figure of generally recognized greatness" either during or following his career. Additionally, there are no specific studies on Sealey, and his work is not discussed at any length in any architectural histories of Southern California.

Also with respect to architectural significance, LBH states that the property "has distinctive elements" and LAC states that it "exhibits several distinctive elements" of the Googie style. According to the National Register upon which the California Register and Long Beach Landmark criteria are based, a property is not eligible in the context of architecture if it merely has some Googie style features.³ The exhibit attached to the LAC letter further indicates that the Googie style is not fully integrated into the overall design of the property. The HRER likewise recognizes that the property, particularly the main building, has some Googie style features. To that end, the HRER describes specific building elements that exhibit the Googie style, along with other architectural elements that do not, indicating that the property "was designed in a general Mid-century Modern style with Googie style elements. Modernism is a broad term given to a number of building styles with similar characteristics, primarily the simplification of form and the elimination of ornament."⁴ Accordingly, the HRER concludes the property as a whole is not a true representative or excellent example of the Googie style.⁵

LBH asserts that the property is also historically significant, but once again does not refer to the criteria under national, state, or local landmark designation programs. Properties may be eligible for listing in the National and California Registers under criterion B/2 and for designation as Long Beach Landmarks under criterion B if they are "associated with the lives of persons significant in our past."⁶ LBH claims that James Stockman and Gerald V. Eisenhower were important businessmen in California history, but provide no information about how they gained significance within their professions. Stockman worked in the hospitality, petroleum, and banking industries; however, working for companies with recognized names does not necessarily imply notoriety and in which, if any, of these professions he was considered important is unclear. Stockman filed for bankruptcy only a few years after the opening of the Edgewater Inn Marina Hotel. With regard to Eisenhower, other than his relation to the President and ownership of the property for a period of time, no information is provided to suggest he was significant in the context of the hospitality industry (or more generally in local, California, or national history) or that the property was associated with his life or work.

² *National Register Bulletin #15, How to Apply the National Register Criteria for Evaluation* (Washington D.C.: National Park Service, 2002), 20.

³ *Bulletin #15*, 18.

⁴ GPA Consulting, Historical Resource Evaluation Report, November 26, 2014, page 17 (Appendix C of the Draft EIR).

⁵ *Ibid.*, 19.

⁶ National Register criteria, Title 36 Code of Federal Regulations Part 60.4; California Register criteria, Title 14 California Code of Regulations Section 4852; and Long Beach criteria, Chapter 2.63.060 Long Beach Municipal Code.



Properties may be eligible for listing in the National and California Registers under criterion A/1 and for designation as Long Beach Landmarks under criterion A if they are "associated with events that have made a significant contribution to the broad patterns of our history."⁷ LBC argues that the property was an "important addition to the Long Beach hospitality business in the early 1960s" based solely upon articles in the *Los Angeles Times*. Such articles, which were often based upon press releases, are not scholarly sources and do not support a conclusion that the property is significant within a particular context. LBH also states that the property hosted "many important events" and lists a variety of social gatherings like club meetings, charity benefits, and cultural functions like musical performances that are typical of a hotel use. However, the property was evaluated in the HRER in the context of tourism, with consideration of the Long Beach Historic Context Statement. As stated in the HRER, "according to the Long Beach Historic Context Statement, a motel [which the Edgewater Inn Marina Hotel technically qualifies as] must have been constructed prior to 1959 to be eligible for listing in the National Register in the theme of tourism, recreation and leisure."⁸ Furthermore, the research conducted for the HRER found that a number of other motels and hotels were developed in Long Beach during the same period, including one designed by Roy Anthony Sealey and another operated by James Stockman. No information has been found in independent sources such as books or scholarly articles indicating the Edgewater Inn Marina Hotel played a significant role in the tourism industry in Long Beach.

LBH and LAC do not seem to dispute the history of the property provided in the HRER. They provide a different opinion about its eligibility as a historical resource subject to CEQA based the same information in the HRER. However, these organizations have not applied the actual criteria for determining significance under national, state, or local landmark programs in their comment letters, nor do they provide additional or new information to support their arguments for eligibility. Based on the substantiated evaluation in the HRER, we have concluded the Edgewater Inn Marina Hotel is not a historical resource as defined by CEQA. The recommended California Register Resources Status Code is 6Z, ineligible for listing in the National Register, California Register, or local designation through survey evaluation. As such, the removal of the existing hotel would not result in a significant impact to a historic resource.

⁷ Ibid.

⁸ GPA Consulting, 16.