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**VIA EMAIL (clerk.plumcommittee@lacity.org)
AND HAND DELIVERY**

Planning and Land Use Management Committee
City of Los Angeles
200 N. Spring Street, Room 395
Los Angeles, CA 90012

**Objection of AlSCO, Inc. to the Proposed Monument Designation
by the Cultural Heritage Commission of the Community Laundry Building
Located at 900-930 North Highland Avenue, Los Angeles, CA (the "Laundry Facility")
CHC 2018-3626-HCM; ENV 2018 3627-CE**

Dear Honorable Committee Members:

This law firm represents AlSCO, Inc., formerly known as Steiner American Corporation (the "**Company**") with respect to the pending application for the proposed Historic-Cultural Monument designation (the "**Designation**") of the Company's Laundry Facility which is pending before the Planning and Land Use Management Committee (the "**Committee**"). It is important to note for the record that this application was not initiated by, nor desired by, the Company and that no one from the applicant group nor the City of Los Angeles had any dialog with the Company prior to the implementation of the Designation application. Additionally, we would like to note that Commissioner Diane Kanner of the Cultural Heritage Commission was the only Commissioner who visited the site and ultimately voted with Commissioner Pilar Buelna in opposition of the Designation. Respectfully, this letter sets forth the Company's objections to the proposed Designation due to its crippling effect on future use of the property as described below.

1. Background of the Laundry Facility.

The Laundry Facility has been continuously operating as a laundry processing facility since its construction in 1928. Community Linen Rental Service purchased the Laundry Facility from Craig Laundry in 1944, and it was then used as the home base for a family laundry, diaper service, home linen service, linen supply, and industrial service business. The Company purchased the Laundry Facility as part of its purchase of Community Linen Rental Service in 1960. In order to utilize this aging structure, significant improvements have been made to the Laundry Facility since 1960. Currently, the Company employs at the Laundry Facility 180 full and part-time employees

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with delivery routes serving the Company's customers throughout the Los Angeles region. Many of the Company's employees live nearby the Laundry Facility.

The parcel on which the Laundry Facility is located is approximately 50,000 square feet in size. In order to alleviate size constraints over the years, numerous improvements have been made and will need to continue to be made in order to continue the effective operation of the Laundry Facility. Improvements to the building have been a necessary part of the Company's efforts to continue operations at this location. As noted in the Recommendation Report (dated July 19, 2018), the building has "undergone multiple alterations over the years" (Page 2). These alterations have been necessary to modernize the building to adapt to current business needs and future alternations are anticipated as equipment and customer needs change. For example, a currently planned improvement includes the addition of a new rail system near the rear of the building. Delays or challenges in implementing business necessary improvements to the building resulting from the Designation are of significant concern to the Company.

2. Monument Designation of the Laundry Facility Will Impact Continuous Operations and Impede Necessary Improvements.

The Laundry Facility is currently zoned as MR-1-1-SN. MR-1 zoning permits all uses included therein as well as those in the CM zone, all of which are primarily devoted to manufacturing or which are otherwise industrial in nature. The applicable 1 Height District designation of the Laundry Facility also does not limit building height by feet. Buildable area is determined by the floor area ratio. The building is 91 years old and, as such, is not designed in a way that complements modern manufacturing or other permitted MR-1 land uses. Modification to the structure is a necessary part of the adaption of this aging structure to meet current (and future) business needs for the Company.

The Laundry Facility is a critical operation as part of the Company's world-wide business. Today the Company operates 170 laundries serving 350,000 customers in 13 countries. Designating the Laundry Facility as a monument will impede the Company's ability to make improvements to the Laundry Facility that are dictated by the demands of the Company's customers and by changing technology. The monument designation would impose another overlay of approvals as a part of any building permits needed by the Company, and will delay the implementation of improvements needed to keep the Laundry Facility operating effectively. Furthermore, additional requirements triggered by the Designation could result in the denial of the implementation of much-needed site improvements, at great impact to the Company and its customers. The disruption in the Company's operations would cause a permanent loss of key employees and customers and would damage relationships which the Company has developed with customers over 50 years at the Laundry Facility site. Such disruptions would also negatively affect the Company's important relationships with its unions, the Teamsters and Local 52.

Beyond this, requiring that any improvements be made in accordance with the California Environmental Quality Act and the Department of Interior Standards for Rehabilitation set forth

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by the United States Secretary of the Interior fly in the face of the basic nature of this Laundry Facility. According to the guidelines provided by the Office of Historic Preservation, Department of Parks and Recreation, for the State of California, monument designation would also require, at a minimum, that the City of Los Angeles prepare “an initial study” to assess impacts of any building proposal and, if significant impact is established, would require an Environmental Impact Report. The stay which would be imposed on construction of much needed improvements required by this process would effectively prevent the Company from making these much-needed improvements.

3. The Laundry Facility is of Questionable Historic Significance.

When viewing the Laundry Facility as a whole, including years of improvements on the back, sides and roof of the buildings, it is difficult, if not impossible, to conclude that the Laundry Facility meets the Committee’s criteria for establishing historical significance. The Secretary of the Interior’s standards were never intended to encompass a structure of cobbled together improvements such as those that have been needed for the Laundry Facility given all of the obvious site constraints affecting the Laundry Facility.

Furthermore, the application for the Designation prepared by GPA Consulting describes the significance of the building as the laundry use (due to its connection to the movie industry) for six pages and its form (Mayan Revival Style) for a page and a half. In review of the application, it is clear that the proposed Designation is relying heavily on the use of the building. It seems contrary to the goals of the Committee that it would approve a Designation that, as noted above, would likely negatively impact that historic use in significant ways.

4. Conclusion.

For all the foregoing reasons, the Company respectfully requests that the Committee reject the proposed monument designation of the Laundry Facility. We will look forward to appearing before you at the Committee’s hearing on January 29, 2019.

Very truly yours,

Snell & Wilmer



Cary D. Jones

CJ