

LAW OFFICES

350 South Grand Avenue Suite 3100 City National 2CAL Los Angeles, CA 90071 213.929.2500 213.929.2525 (Fax) www.swlaw.com

Cary D. Jones (213) 929-2501 cjones@swlaw.com ALBUQUERQUE
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January 25, 2019

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. <u>Monument Designation of the Laundry Facility Will Impact Continuous</u> 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

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Dear Council Members:

I am writing to you in support of 1110-1116 South Abbot Kinney Boulevard. As a patron of the Arts, LACMA Trustee, and member of several other boards throughout Los Angeles, it is of deep concern to me that you please preserve and historically protect this property.

1110 – 1116 S. Abbot Kinney has played a critical role in Los Angeles' postwar visual and musical arts movements. Specifically, four globally celebrated artists created monumental work while using this location as their studios: Harry Partch, John McCracken, John Altoon, and Fred Eversley. This building has essentially served as a launching pad for these artists who, collectively, have served as ambassadors for the Los Angeles Artists scene around the globe for over sixty years. Most recently, Fred Eversley has been creating groundbreaking sculpture informed by science and technology here. His work can be found in 40+ major museum collections. In Southern California alone, his work is at LACMA; The Long Beach Museum of Art; The Newport Harbor Art Museum; Palm Springs Desert Museum; Laguna Art Museum; Fisher Museum of Art at USC; and Santa Barbara Museum of Art. Further, his work produced at 1110-1116South Abbot Kinney has been exhibited locally at The Hammer Museum; Mark Bradford's Art + Practice: The Underground Museum; Loyola Marymount University; and LACMA. Mr. Eversley is one of the last living representations of the pioneering artists who settled in Venice several decades ago and remains a central figure in the globally respected Art World nucleus that Los Angeles has become. Generously hosting some of the world's most prominent art patrons, journalists, and academics in 1110-1116 South Abbot Kinney, Eversley and his predecessors have stamped a unique narrative on this special space.

It has been my honor to spend time in Mr. Eversley's studio. He is one of America's most important sculptors who also happens to be a living Venice Art history textbook. The hands of time turn back to 1960's Venice within the framework of his studio. To redevelop 1110-1116 South Abbot Kinney in any fashion would be to remove one of the last representations of the original Abbot Kinney—a pedestrian-friendly, single story and human-scale neighborhood. This building epitomizes why we have Cultural Heritage Commissions. As a concerned and passionate citizen and community leader in Los Angeles, it is my great hope the commission agrees that we must protect what is already, in local art lovers' opinions, a Venice and LA Art Scene monument.

Best Regards-Allison Berg +1 917-755-0075

Google Groups

Letter of Support for 1110-1116 Abbot Kinney Blvd, Council file No. 18-1140

Cameron Trowbridge <camtrowbridge@yahoo.com>

Jan 25, 2019 2:29 PM

Posted in group: Clerk-PLUM-Committee

Planning and Land Use Management Committee City of Los Angeles clerk.plumcommittee@lacity.org

RE: Letter of Support for 1110-1116 Abbot Kinney Blvd, Council file No. 18-1140

January 25, 2019

Dear Committee Members:

I am writing to you in support of 1110-1116 South Abbot Kinney Boulevard. As an information professional who works in the heritage preservation field at the Getty Conservation Institute and as a longtime member and docent for the Los Angeles Conservancy, it is of great concern to me that you endeavor to preserve and protect this historically important property.

1110 – 1116 S. Abbot Kinney sits within the last remaining corridor of intact 1920s commercial buildings associated with the Venice Short line and early 20th century commercial development in Venice. This particular block of Abbot Kinney remains largely as it was nearly a century ago when it was developed as a pedestrian-friendly, human-scale, and single-story neighborhood. It is corridors like this that define the character of Los Angeles' evolution as a major American city. However, they are also disappearing quickly from our urban landscape--the result of irreparable alterations and wholesale destruction. More significantly, 1110 – 1116 S. Abbot Kinney has also played a critical role in Los Angeles' postwar visual and musical arts movements. Specifically, housing the studios of four globally celebrated artists who created some of their most important work at this location: Harry Partch, John McCracken, John Altoon, and Fred Eversley. If ever there was a reason to preserve 1110 - 1116 S. Abbot Kinney, it is to preserve the legacy of these ground-breaking and iconic American artists.

The vibrancy of Abbot Kinney Boulevard has everything to do with its historic character and the intention of Venice of America founder to make the community a center of arts, culture and entertainment. I sincerely recommend that the Committee Members make every effort to acknowledge and protect the historical integrity of the 1110 - 1116 S. Abbot Kinney.

Sincerely, Cameron Trowbridge camtrowbridge@yahoo.com 323-445-6897

Google Groups

1110-1116 Abbot Kinney Blvd.. Council File 18-1140

Denise <dlruttman@gmail.com>

Jan 25, 2019 3:37 PM

Posted in group: Clerk-PLUM-Committee

Dear People,

I work in Mike Bonin's District 11 and have for many years. I have a salon business in Venice, am a board member of the Venice Historical Society and am a member of the Venice Chamber of Commerce. For many years I was a tenant upstairs at 1108 Abbot Kinney Blvd. I got familiar with and loved the building for its unique structure and nuances. Time seems to roll back and pause when I look at the boxcar/streetcar style and think of the storefronts. There are not many buildings left like it.

The boulevard wasn't the bustling place it is now but it was always very cool to know that artists, important to the art world, were behind those doors. Very Venice. The artists were using the lighting and space in these buildings to do amazing things. I got acquainted with Fred Eversley as a wonderful neighbor and I was lucky enough to see his studio and works in progress. The building is iconic and the studio has been shared with the public on different annual art walks. It's quite apparent how much artists like Fred, McCracken, Partch and Altoon were and are a part of the soul and history of Venice that gave it its arty reputation.

I've observed for years as Venice, a bit rough and not the safest place to work then, has changed into a thriving, busy and a happening boulevard. I've seen a time when we might ask someone to walk us to our cars change to a new time when you can barely find parking. Venice is becoming unfordable and dangerously close to gentrification. We need a serious check on what changes are made here so as not to compromise the character that was and still is what makes Venice so sought after. Venice adds so much to the city of Los Angeles and is not getting the preservation and care that it so richly deserves. 1110-1116 should be deemed an historic cultural landmark as the Cultural Heritage Committee unanimously has deemed. I urge the PLUM Committee to recommend designation of 1110-1116 Abbot Kinney Boulevard as an Historic Cultural Monument. Thank you in advance for your consideration in this manner,

Sincerely, Denise Ruttman

Google Groups

"1110-1116 Abbot Kinney Blvd, Council file No. 18-1140" in the subject line.

Eliane Gans <elianegans@gmail.com>
Posted in group: Clerk-PLUM-Committee

Jan 25, 2019 3:51 PM

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Dear Counsel Members and Members of the Plnning and Land Use Committee,

As a long time member of the Veica community and the Art Community, I strongly urge you to unanimously approve the

1110-1116 Abbot Kinney Blvd. Building to remain a cultural monument and to be a part of our cultural heritage

The Cultural Heritage Commission, the city's dedicated body of historic preservation experts, voted unanimously to recommend designation of this important building.

I urge the PLUM Committee to recommend designation of 1110-1116 Abbot Kinney Boulevard as an Historic Cultural Monument.

ARTfully, *Eliane Gans*LONNY GANS & ASSOCIATES
Fine Art