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January 25, 2019

The Honorable City Council Members
Planning and Land Use Management Committee
200 No. Spring Street
Los Angeles, California 90012

Re: 1110-1116 South Abbot Kinney Boulevard

Dear Honorable Council Members:

This office represents ABCO, LLC, owner of the above referenced property. I write on behalf of my client to oppose recommending to the City Council that this property be included as a Historic-Cultural Monument. I do this both on procedural grounds and on the basis that the conclusion reached by the Cultural Heritage Commission was wrong.

The building, and its "style," does not embody distinguishing architectural characteristics valuable to a study of a period, style, method of construction, or the use of indigenous materials or craftsmanship, or is a unique or rare example of an architectural design, detail or historical type valuable to such a study. Nor is it truly "associated" "with postwar musical and visual arts in Venice, especially the emergence of West Coast Minimalism and the Light and Space movements."

While a few artists who are well-known primarily within a small circle of admirers (I wonder how many Angelinos could identify any of the artists who are supposed to be connected to the property?) may have at one point occupied parts of the property, for relatively short periods of time, the building itself is not identified with these artists nor are their best works connected with the property.

All the artists referred to have had many other studios, for instance, Fred Eversley has maintained a home and studio in Manhattan, New York City, the entire time he is supposed to have lived and worked at the property.

The March, 2015 Historic Resources Survey Report, Venice Community Plan Area prepared for the City by Historic Resources Group of Pasadena, California fails to include this property in its listing of Streetcar Commercial Development, 1873-1934 or in any other section. Nor are any of the artists referred to in the Cultural Heritage

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Commission's findings are listed in the Report, though there is included a discussion of the post-war art scene.

Finally, there is the procedural issue. Notice of the November 15, 2018 hearing, which was supposed to be the Public Hearing, was mailed to my client on November 7, 2018. This is not timely notice.

"The time, place and purpose of the public hearing on the proposed designation shall be given by mailing written notice at least ten days prior to the date of the hearing, to the applicant, if any, and to the owner of record of a property or the owner's representative, if different from the applicant or if the designation was proposed by initiation. Notice to the record owner or the owner's representative shall be sent via Certified Mail, Return Receipt Requested." Section 22.171.10(d)(4) Los Angeles Administrative Code.

As a result notice was not received timely and my client was unable to attend or send a representative. With the lack of a supportable basis for the designation and the denial of my client's procedural due process, I urge the Committee to decline to designate the property as a Historic-Cultural Monument.

Thank you for your attention.

Yours truly,



CRAIG MORDOH

CM/km

cc: ABCO, LLC