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October 30, 2018

VIA E-MAIL

Steve Mizokami
Senior Planner
City of Santa Monica,
1685 Main Street, Room 212
Santa Monica, California 90401

Re: Landmark Application #18ENT-0166 (Proposed 11th St. Historic District)

Dear Mr. Mizokami:

This letter is written on behalf of my client, the trustee of a trust that owns a residence located within the proposed district, and a subject of the above application. Although my client has had someone in attendance at all of the local meetings on this application, he wanted to be assured that the City, the Landmarks Commission, the City Council and the applicants are fully aware that he is **opposed** to any change of status to the real property located at 1229 11th Street. For that reason, this letter will be copied to all of the relevant parties.

My client is 74 years old and has been in Santa Monica since the late 1970's. He purchased his first home in 1978 (forty years ago) on Bay St., near 2nd street. He is a semi-retired businessman, not a developer. His daughters attended SAMO High and Santa Monica City College, before going away to a university. They both returned to Santa Monica after college. One lives in the back unit at 1229 11th Street and the other lives farther south on 11th St. His dream when he purchased this location was to build a cluster of condominiums for the use of himself and his daughters. That would have also included affordable housing units. He would be able to have his girls and their families near as he aged. There is currently no room for both of them to live there. That is still his American dream.

Although Santa Monica allows, by statute, anyone to file an application to render any property within the City a landmark, the actual designation is done by the City. The statute does not require consent by the owner or resident of the property, however this does not mean that it can be undertaken lightly, when that consent is *not* present. Real property ownership is one of the oldest and most protected rights in this country and any taking or conversion by the government should be done when the need is overwhelming, the facts are compelling and there is

no less intrusive alternative. A thorough review of the application and previous documents prepared by both the City and those affiliated with the Applicants demonstrates that this Application is lacking in both merit and equity. In fact, a Preliminary Historic District Assessment commissioned by the City and prepared by an independent expert in relation to an almost identical list of properties as set forth in the application, dated December 2017 and distributed at the first Landmarks Commission meeting the next month, found that “the 1200 block of 11th St. Cluster does not appear to be eligible for historic district designation”. Arguments justifying designating 1229 11th Street a historic landmark or part of a historic district as proposed in the application are without sufficient merit to overcome the property rights of the owner in this instance.

The application itself has taken some license with the facts and is written in not merely a persuasive fashion but has included “everything but the kitchen sink” in an effort to justify its purpose. For example, the fact that an owner of one of the properties (although he never lived there and bought it as an investment) was a cousin of the Lennon sisters demonstrates how far reaching are the efforts to make this area into something that it never was/intended to be.

The application is authored by those who are heavily invested in the preservation aspect of this city’s development and while that is a commendable and necessary part of the community, in this instance there appears to be a subject matter as well as a personal bias, supporting this application. Leading the charge and referring to themselves as “Friends of 11th Street” includes a person who, until very recently, sat on the Landmarks Commission and has previously made comments favorable to houses within this area becoming historic. While it is somewhat common for commissioners to “represent” particular interests in Santa Monica or to go back and forth between their civic duty and their passion in a particular area, my client deserves a ***fundamentally and factually unbiased decision by this commission***. Having recently stepped down, she has been replaced by another commissioner who is also very closely aligned with another Applicant in this application and as such, there is the appearance of a conflict, whether it is truly present or not. (Interestingly enough this commissioner heard and took no action on a previously filed Application for Demolition on my clients’ same property and a demolition permit was approved).

Represented at all of the community meetings is a small but vocal part of the Santa Monica community; a collection of residents and non-residents who are heavily and passionately invested in preservation to the exclusion of other equities. This is an admirable vocation and every community needs to hear their voice and address their concerns when possible, however that small part of the entire Santa Monica citizenry should not have more access than any other group of citizens in Santa Monica. Most of the supporting documents of this application are provided by persons/interests that have no nexus to Santa Monica. As such, this is not an accurate or fair representation of the community interest as a whole.

I will not point out each of the deficiencies in this application but will merely state the reasons why this application fails to support the factors necessary for landmark designation. As previously stated, the threshold for the taking or conversion of real property by the government is high and that threshold is not met here. Even though landmark designation is not necessarily the same as eminent domain, when abused, it becomes the same and harkens back to the days when

eminent domain was the vehicle used for landmark designation. At least then, property owners were compensated for their property.

I will start with the address of 1229 11th Street in this discussion. My client purchased this property in 2006 as a “tear down” and development investment. The property had been abandoned after the death of the previous owners and overlooked by the City. It was in such poor shape that it was sold “as is”. At the time it was truly only useful as development property, with the structures being of little value. The back half of the property was completely overgrown, and the back unit was in use by transients. In cleaning it out it was determined to be infested with rodents and both human and rodent debris. Among the items found were rat carcasses, hypodermic needles and crack pipes. The City and the neighborhood had turned its back on this “potentially historic” property. The property was (and still is) zoned R3, Medium Density Multiple Family Residential. My client paid for the cleanup of the property as well as all costs associated with making the units habitable, pending his “Application for Demolition” which had been filed with the City. At the October 9, 2006 Landmarks Commission meeting the application was reviewed. Some of the present commissioners were on the Commission at that time. No commissioner objected to the demolition application. No Application for Landmark Designation was filed, and the demolition permit was issued through September 29, 2008. My client hired architects and developed plans for construction, however, because of the downturn in the market and the recession, he was unable to develop the property at that time. He paid market value for an R3 zoned lot with development potential. A historic designation, whether separately or as part of a district will greatly reduce the value of this property to him and his children, whether he ever decides to develop it or not.

The pertinent question here is whether this house, in this immediate neighborhood, along with the other listed properties, retains enough historical integrity to be designated a historical district, using established criteria. Or, is this particular area being considered more out of personal desire and passion, and at best marginally historic? Using the criteria established by the City, this property does not meet the standards for designation as “historical” in nature. It does not reflect any particular cultural, social, political, economic or architectural significance that is not extant in other areas of Santa Monica. While it may have once and for a very brief period of time represented a “middle class” house in Santa Monica, the city, in the area this close to the beach, quickly became out of reach to most single-family middle-class buyers, except in the area of multi-family housing. The middle class was first represented in areas north of Montana, not this far south.

This house was built in 1911 and represented the “mini-me” concept of the California Craftsman, being much smaller than its famous relative. Shortly after it was built, second units were built on this and adjacent parcels, reflecting the need for both rental income and affordable housing in Santa Monica. All of the parcels on this block of 11th Street had additional parcels built behind the main residence. Most of the data submitted suggests that many of these homes were purchased by more senior citizens or retirees than families with small children, an indication that the buyers had accumulated wealth and not necessarily representative of the just the middle class. Also, this type of house was being built all over Santa Monica and is not particularly significant as to style. Indeed, most of the houses in this potential district represented different architectural styles and are not adequately representative of any particular style. These

types of homes are extant in Santa Monica, and in areas that remain much more a “neighborhood” than the busy 11th Street corridor, for example, the Third Street Historic District and its surrounding blocks.

By the 1920’s there was an explosion of apartment buildings in the city, merely a decade after this house was built. Indeed, this trend continued into the 11th Street corridor and presently this block has twelve original lots that have apartment buildings/condominiums and six original lots that still have a single-family residence. Prior to the explosion of apartment buildings, the six lots that have a single-family dwelling also added multiple dwelling units behind the main structure, an indication that this block was continuously in a state of changing development and not indicative of a *significant* moment in time.

It is also noteworthy that the houses that comprise the proposed historic district represent different styles of architecture which detracts from the cohesiveness of the district. They have also had numerous changes in the structural integrity over time and no longer accurately reflect any particular period. The one thing they have in common is that they are old. Although the applicants have suggested that stucco should be removed, and other changes made to bring structures back to the original facade, that is more an indication of how much the *integrity has diminished* than a reasonable accommodation to be expected of the current owner. In their present state, many of the houses do not appear to be part of any neighborhood, having been shut off from visibility by either privacy fences or vegetation. This is probably also a means to shut out the noise of the traffic from the busy street. Even though the applicants have suggested that “pride of ownership” in a historical district may persuade the owners to make these changes, the truth is that these houses are mostly rental units, under rent control and most owners will not spend the money necessary to make these changes. The Applicant further defined separate possible clusters for historical designation. In cluster one, which contains my client’s house, there are three structures. ***Two of those three owners adamantly oppose*** this historical district. The third owner has not been reachable as of yet.

As stated before, there are other areas in Santa Monica that more accurately reflect middle class neighborhoods from the early 1920’s than this particular block. Before proceeding on this application, the City should have at least researched the other areas in the City where the same result could be achieved, *with* the consent of the owners. The purpose of the change in the statute making owner consent not a requirement did not make that consent irrelevant, even though it appears that the City is interpreting the statute in that manner.

IMPORTANT PERSONAGES

There is no direct connection to important personages with regard to the 1229 property, nor most of the other properties within the potential district. Although Ken Strickland, a special effects genius, lived at 1223 as a teenager, there is no evidence that his later accomplishments can be in any way attributed to that location. In fact, the notable garage mentioned in the application was torn down many years ago and he moved to another location in Santa Monica in early adulthood, before he obtained any notoriety. The Strickfaden heirs sold the property to James and Doris Lennon in 1963. The Lennons purchased the property as rental property and

never resided at that house, and the fact that they may have been cousins to the famous Lennon sisters is far reaching enough to be irrelevant.

DISTINGUISHING ARCHITECTURAL CHARACTERISTICS

Almost every structure embodies architectural characteristics relevant to a particular period, however nothing is particularly distinguishing or rare about the structures listed for consideration in this application. Each of them has its own architectural characteristics but none have been identified as being unique from other similar type buildings in Santa Monica or identified as a rare specimen. In fact, many of the same characteristics are identified in and around the Third Street District and all of the Bay Street Cluster is Craftsman architectural design. Of the 129 landmarks already designated, either as a landmark or Structure of Merit, many, many of them are either California Craftsman, bungalows or Colonial Revival. There are also numerous other examples in the city that have not yet been designated. Accordingly, the structures in this potential district are in no way unique or rare in the city.

NOTABLE BUILDERS

The two builders listed as notable are Cowan and Rowe. Cowan was a speculator who built a few houses in Santa Monica, lived here briefly and then moved to Lancaster where he became an enthusiast in horticulture. By 1919, within a decade of him building houses in Santa Monica, he was listed in the California Laws Relating to Animal Industry, (1919, California State Printing Office) as the owner of a nursery in Lancaster. He was truly an entrepreneur and dabbled in many areas, including real estate, construction and automobiles. Indeed, he made a profit on the houses he built in Santa Monica and then moved on to other endeavors. This does not make him notable as a builder within the meaning of the stated criteria.

James Rowe also was an early builder in Santa Monica. He already has a Craftsman bungalow at 929 Lincoln that is designated a landmark. There is an almost identical structure at 927 Lincoln, however it is not landmarked. The applicants mention another house of his that was determined eligible for the National Register (William Pigott House at 426 Palisades Ave.), however this house is not listed in the most recent city publication dated July 2018 as a city landmark, which is curious if he is indeed a notable builder. The houses on Lincoln are only about eight blocks away from this potential historical district and were built in 1908, even earlier than his houses being considered here. If he was such a prolific builder there are probably many more examples still existing. There are examples of Craftsman bungalows all over Santa Monica.

LOCATION

The 1200 block of 11th Street is a busy four lane street with direct access to the freeway. Because of the freeway access it has higher than usual traffic than most residential streets in the city. Two of the lanes are available for parallel parking as this is also a densely populated area. There are stop lights at both intersections which is also not so common in residential areas. It is surrounded by commercial areas both to the north and south of the location. Because most of the lots are comprised of rental apartments, there is a higher rate of short term residents which

detract from the “neighborhood” feeling. Many of the people frequenting the area are mostly visiting the commercial establishments on the adjacent Wilshire Blvd. and are not taking note of the neighborhood, beyond the parking spaces and close proximity to the commercial properties. This street has none of the qualities listed in the application of the original “neighborhood” and has completely lost its historical authenticity. The potential historic properties are broken up with multiple multi-unit apartment buildings or condominiums which breaks the flow of the area and severely diminishes its historical value as a district.

In other words, the “horse is already out of the barn” with respect to its historical integrity as a historical district. It would be impossible for the city to force the changes necessary to bring the area back to its original authenticity. It would also be extremely burdensome to the owners of the properties to be coerced to correct this, one hundred years after the fact. Because most of the houses are rental units, they will not receive the full benefits of the Mills Act unless they are taken off the market as rentals and the owners or their families move into the units. It is doubtful that this would happen in each instance, but it could be an unintended consequence in several houses if the historical district is formed.

CONCLUSION

Santa Monica has previously designated nine Craftsman homes as historic and four as Structures of Merit. The city also has designated three Colonial Revival homes as historic and one as a Structure of Merit. These figures do not include the fifty-one historic structures within the Third Street District, many of which represent both of these styles. There are also many other examples within the city, so there is no compelling need to turn what is marginally historical here, into a Historic District. As presently situated, among mostly apartment buildings, on a busy thoroughfare, and many hidden from view, these structures will never harken back to the days of 1910-25 in the minds of passerby’s.

This is not the first time that the commission has been asked formally or informally to make this a historic district or to designate particular houses on this block as landmarks. The same people have over and over again requested this, going back to the late 80’s-early 1990’s. Many letters of support in this application were submitted in the early 1990’s. The street has become less historic over time, not more so. Also, since that time the City has designated many Craftsman homes as landmarks and designated two Historic Districts which comprise Craftsman examples. Adding marginally historic areas as landmarks or districts takes away from the status of being a landmark in this city and dilutes the integrity of existing properties so designated. It is already surprising that more of the landmarked properties have not become National Landmarks given the number on the list. Pride of ownership as an owner of a designated structure assumes that the City will be particular when it adds other properties.

The Preliminary Historic District Assessment Report prepared by Jan Ostashay got it right the first time, concluding that “due to the lack of historical integrity of many of its components and compromised integrity of the neighborhood’s contextual setting, feeling and association the 1200 block of 11th Street Cluster does not appear to be a geographically definable area possessing a distinct concentration of historical properties”. Efforts to throw a lot of

marginal structures together in hopes that the grouping will hide the inherent flaws of each do not change the fact that each is historically deficient. Nothing factually new has been added or discovered since the preliminary assessment was made except that there has been a coordinated campaign by the applicants to obtain by passion what they could not obtain factually.

My client respectfully requests that the Commissioners **not** recommend this group of houses as a Historic District.

Karol E. Boloorchi
Attorney at Law

Cc:

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October 29, 2018

Landmarks Commission
City of Santa Monica
1685 Main Street
Santa Monica, CA 90407

Re: Proposed 11th Street Bungalow Historic District
Case No. 18ENT-0166
Opposition to Proposed Designation

Dear Chair Pro Tempore Sloan and Honorable Commissioners:

This office represents Doris Lennon with respect to her property located at 1223 11th Street, which is one of the properties identified as a contributor to the proposed 11th Street Bungalow Historic District. Ms. Lennon is opposed to the proposed designation. **For the reasons outlined below, we respectfully urge the Commission deny the pending application.**

A. The Proposed District Lacks Integrity.

As detailed in the Preliminary Historic District Assessment Report for the 1200 Block 11th Street Cluster prepared by Ostashay & Associates Consulting dated December 2017 (“Preliminary Report”), a historic district derives its significance as a single unified entity. The National Park Service (“NPS”) provides,

“The identity of a district results from the interrelationship of its resources, which can convey a visual sense of the overall historic environment or be an arrangement of historically or functionally related properties.”

Here, the 1200 block of 11th Street underwent substantial redevelopment beginning in the late 1950s, when two story apartment buildings began replacing the homes along the street and others in the immediate neighborhood. A few of the larger multi-family residential buildings occupy two lots, thereby disrupting the uniformity of the original subdivision footprint. Because of the later infill of modern multi-family buildings, the front yard setbacks along the block are irregular and are inconsistent with the historic environment.

Moreover, traffic signals have been placed at both ends of the block, which has resulted in a high volume of automobile traffic that runs along the block. This high amount of traffic disrupts the residential contextual setting of the block. In addition, while the block is a single-lane in both directions, because the dedicated parking lanes and bicycle lanes are located along both sides of the street, the road visually and physically reads as four lanes wide. These attributes significantly modify the historic context, feeling and setting of the area.

In addition to the compromised integrity of the neighborhood's contextual setting, and as detailed in the Preliminary Report, the collective grouping of the proposed contributors to the district lacks sufficient architectural merit, direct associations with important personages, and adequate historical identity to be eligible for local historic district designation. The extensive loss of historic fabric on some of the proposed contributors have further compromised the collective historical integrity of the small collection of properties identified as a potential thematic grouping.

While the pending application provides alternative boundaries for the proposed district to increase the ratio of contributors, no configuration of the proposed cluster or district eliminates the historical integrity deficiencies highlighted above and discussed in detail in the Preliminary Report. The proposed district is not eligible for local historic designation.

B. The City Has Failed to Conduct Environmental Review Under CEQA.

In order to “[e]nsure that the long-term protection of the environment, consistent with the provision of a decent home and suitable living environment for every Californian, shall be the guiding criterion in public decisions” (Pub. Resources Code, § 21001(d)), CEQA and its implementing administrative regulations establish a three-tier process to ensure that public agencies inform their decisions with environmental considerations. No Oil, Inc. v. City of Los Angeles (1974) 13 Cal.3d 68, 74. The first tier is jurisdictional, requiring that an agency conduct a preliminary review to determine whether an activity is subject to CEQA. 14 Cal. Code Regs. §15060; see Pub. Res. Code § 21065.

Whether an activity constitutes a project subject to CEQA is a categorical question respecting whether the activity is of a general kind with which CEQA is concerned, without regard to whether the activity will actually have environmental impact. Thus, for CEQA’s purposes, “[p]roject’ means an activity which may cause either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment...” Pub. Res. Code § 21065.

Here, the proposed historic district designation is a “project” under CEQA because it will cause a reasonably foreseeable indirect physical change in the environment. The population of California is ever increasing. Our Legislature has declared that “[t]he availability of housing is

of vital statewide importance, and the early attainment of decent housing and a suitable living environment for every California family is a priority of the highest order.” Gov. Code §65580(a). In order to “assure that cities and counties recognize their responsibilities in contributing to the attainment of the state housing goal” (Gov’t Code §65581(a)), the Legislature requires that local jurisdictions in their land use planning “identify adequate sites for housing ... and ... make adequate provision for the existing and projected needs of all economic segments of the community” (Gov’t Code § 65583), including “the locality’s share of the regional housing need” (Gov’t Code § 65583(a)(1)). Thus, no California locality is immune from the legal and practical necessity to expand housing due to increasing population pressures.

It can be reasonably anticipated that effectively downzoning the contributor properties within the proposed district, which are designated for medium density residential uses, will result in displacing development to other more environmentally sensitive areas of the City. As earlier noted, the definition of project for CEQA purposes is not limited to agency activities that demonstrably will impact the environment. “... CEQA does not speak of projects which will have a significant effect, but those which may have such effect.” No Oil, Inc. v. City of Los Angeles, *supra*, 13 Cal.3d at p. 83, fn. 16. See Muzzy Ranch Co. v. Solano County Airport Land Use Com. (2007) 41 Cal.4th 372, 383 [displaced development within the concern of CEQA].

Despite the above, the City has conducted no environmental review of the proposed designation. The City’s actions in this regard are contrary to the requirements of CEQA. As such, the pending application must be denied.

C. The Proposed Designation is Inconsistent with City and Statewide Policies to Encourage Density Near Transit.

The passage of Senate Bill (“SB”) 375 in 2008 created a process whereby local governments and other stakeholders must work together within their region to achieve greenhouse gas (“GHG”) reductions through integrated development patterns, improved transportation planning, and other transportation measures and policies. Additionally, SB 375 required that GHG reduction targets be incorporated within a Sustainable Communities Strategy (“SCS”), a newly required element within the Metropolitan Planning Organization’s Regional Transportation Plan.

The Santa Monica Sustainable City Plan anticipates that most GHG reductions would come from increased energy efficiency, increased renewable energy production, and reduced transportation-related emissions through increased use of alternative transportation. Transportation Goal 2 of the Sustainable City Plan is to “Facilitate a reduction in automotive dependency in favor of affordable alternative, sustainable modes of travel.”

Here, the proposed district is four blocks away from the Expo Line, and less than a mile from two separate stations. Eliminating otherwise allowable density from contributing properties within the proposed district is contrary to the Sustainable City Plan's goals, and contrary to statewide policies to reduce GHG and reverse adverse effects of climate change.

D. The Proposed Designation is Inconsistent with the City's Affordable Housing Goals.

The Sustainable City Plan's Housing Goal 1 is to "Achieve and maintain a mix of affordable, livable and green housing types throughout the city for people of all socioeconomic/cultural/household groups (including seniors, families, singles, and disabled)."

The proposed designation is overtly anti-poor. Anything that increases cost even slightly, pushes lower income residents out of the neighborhood. Property owners within the proposed district who want to make changes to the exterior of their homes, or redevelop a non-contributing site, will see that process become much more expensive and time consuming, which in turn could lead to higher prices for renters.

The cost starts at the design phase. Architects have been known to charge multiple thousands of dollars more when working on projects in historic districts, in anticipation of the extra meetings and revisions that are sure to come. Then comes the cost of the materials. Often materials approved for changes to a contributing structures are significantly more expensive than similar alternatives. Finally, there is the cost of time and hassle. Not only will plans require an extra level of review for historic compatibility, preparing for that review necessitates research, including consulting with City staff in advance of the actual application. If the alterations are significant enough in scope, that escalates to a full hearing in front of the Landmarks Commission, which only meets monthly. Any rounds of revisions, therefore, can mean a multi-month delay.

Not only do the contributing properties have to endure this added cost, the existing apartment buildings will as well, at least until implementing standards are adopted for the proposed district. And, if the San Vicente Boulevard Courtyard Apartments Historic District provides any example, adoption of implementing standards will not occur for several years after the proposed district is designated.

These added costs may drive some of the existing owners out of the neighborhood. Additionally problematic is the possibility that the added costs will be passed down to the tenants, contrary to the City's goals of maintaining affordable housing for all of the City's residents.

E. Conclusion.

The pending application was filed and is being driven by the current tenant of Ms. Lennon's home. While it is understandable that she does not want to run the risk of Ms. Lennon redeveloping the site to accommodate more (much needed) housing units, this application is clearly a misuse of the City's processes.

As the Preliminary Report concludes, the proposed district lacks historical integrity. It is not eligible for listing under the Landmarks and Historic Districts Ordinance or the NPS Guidelines, and the proposed alternative boundaries of the district suggested by the applicant do nothing to resolve the deficiencies. Given the lack of integrity, the proposed designation's inconsistency with important state and citywide laws and policies cannot be ignored.

Based upon the above, we respectfully urge the Commission to deny the pending application. Thank you for your time and consideration of this matter. As always, please do not hesitate to contact me at any time with any comments or questions that you may have.

Sincerely,

GAINES & STACEY LLP

By 

ALICIA B. BARTLEY

cc: Steve Mizokami (steve.mizokami@smgov.net)
Stephanie Reich (stephanie.reich@smgov.net)

Associated International Marketing
3021 E. La Jolla Street
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November 2, 2018

TO: Mr. Steve Mizokami
Senior Planner, City Planning Division
1685 Main Street, Room 212
Santa Monica, CA 90401-3295

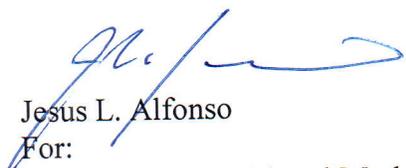
RE: Case # 18ENT-0166: 11 Street between Wilshire Blvd. and Arizona Ave.
Proposed Historic District

Dear Sir:

Associated International Marketing, a California Corporation, is the owner of the property located at 1233 11th Street, Santa Monica 90401. We would like to inform the City of Santa Monica, the Landmark Commission, City Council and all agencies, applicants that we are **opposed** to the yes vote by the commissioner to make our property a part of the historic district or any change in its current real property status.

Please let this letter of opposition carry it through all the course of formalities of the hearing process.

Thank you.



Jesus L. Alfonso

For:

Associated International Marketing
Corporate Secretary