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Faruk Sezer, P.E.
Assistant Director, Government and Community Relations
Los Angeles Department of Building and Safety
201 N. Figueroa St.
Los Angeles, CA 90012
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**Re: Demolition Permit Application for The Barry Building,
located at 11973 West San Vicente Boulevard, Los Angeles
Historic Cultural Monument No. 887**

Dear Faruk Sezer,

On behalf of the Los Angeles Conservancy, I urge that the Department of Building and Safety (DBS) to follow the Cultural Heritage Commission's recommendation to not issue a Statement of Overriding Considerations (SOC) for the proposed demolition of the historic Barry Building at 11973-11975 San Vicente Blvd.

The Barry Building has been a listed Los Angeles Historic-Cultural Monument (HCM) since 2007. It is significant under Criterion 1 as the longtime home of Dutton's Brentwood Bookstore, a symbol of the Los Angeles literary scene and legacy business, that contributed to the growth and development of the San Vicente commercial corridor in Brentwood, and Criterion 3 as an excellent example of International Style architecture.

We concur with the Office of Historic Resource's staff report that the EIR was completed in compliance with CEQA and appropriate to certify. The EIR found that demolition permit of the Barry Building would constitute significant unavoidable adverse impacts, both from the loss of a historic resource and the proposed project's conflicts with the goals, objectives, and policies of both the General Plan Conservation Element and the Brentwood-Pacific Palisades Community Plan. The EIR identifies preservation alternatives and an environmentally superior alternative that would avoid



adverse impacts and mitigate the harm to this historic resource. Unless there is a compelling reason, the environmentally superior alternative must be selected.

Therefore, the issuance of a SOC is unwarranted. Simply put, the demolition of a structurally sound HCM for a vacant lot would constitute more adverse impacts than any perceived public benefits, for this HCM and others whereby issuance of a SOC will otherwise set a dangerous precedent for Los Angeles.

The applicant offered four claims to justify demolition:

- 1) Removal of an existing safety hazard and seismically unsafe and noncompliant structure;
- 2) Removal of an attractive nuisance for vandals, transient populations, loitering, and other unlawful behavior;
- 3) Clear the existing property of noncompliant structures in a manner that will not preclude any future development consistent with existing zoning; and
- 4) Comply with the Soft-Story Ordinance, which provides for demolition at the owner's option, within the time limits as specified in the Ordinance, is the only economically feasible course of action.

We strongly dispute the applicant's claims that the benefits of the project outweigh the adverse impacts of demolition. The building is not a hazard or nuisance; it was in excellent condition until the tenants were forced to vacate in 2016 and the building owner/applicant intentionally left the Barry Building to deteriorate without providing even routine maintenance.

Soft-Story retrofitting is an economically feasible option, as evidenced by other similar buildings that have achieved this status and the staff report's findings about the limited scope of retrofit and precedent of other similar HCMs. The owner is rather *choosing* not to retrofit which is an available and viable option to address compliance with the City's Soft-Story Ordinance.

Lastly, we echo the staff report in reiterating and naming the owner as the responsible party for the vacancy and neglect of a known and designated historic building that was previously a thriving community asset. Rewarding the owner to demolish the site because of self-imposed, vacancy-related nuisances would incentivize this property owner's negligence of an historic building, as well as any other owner that chooses demolition by neglect of an HCM in the future. Further, the owner has not filed for a replacement project on the site whereby preservation alternatives can be fully evaluated and considered.

The Cultural Heritage Commission firmly opposed the demolition of this HCM for a vacant lot. Questions were raised by Commissioners Barry Milofsky and Richard Barron, two of the architects who have considerable experience with historic buildings and seismic retrofits. They specifically addressed the feasibility of retrofit, which they believe to be fairly simple and



routine, with heavily inflated numbers in question and no meaningful response provided by the applicant's team.

Adopting a SOC is not warranted in this case and sets a dangerous precedent for how the City values and protects HCMs, and could open up future neglect by owners who are noncompliant with DBS' mandatory retrofit programs. We strongly urge the DBS to reject the applicant's claims for a SOC.

If you have any questions for about the Conservancy's position, please do not hesitate to call me at (213) 430-4203 or email me at asalimian@laconservancy.org.

About the Los Angeles Conservancy:

The Los Angeles Conservancy is the largest local historic preservation organization in the United States, with nearly 5,000 member households throughout the Los Angeles area. Established in 1978, the Conservancy works to preserve and revitalize the significant architectural and cultural heritage of Los Angeles County through advocacy and education.

Sincerely,



Andrew Salimian
Director of Advocacy

cc: Councilmember Traci Park
Jeff Khau, AICP, Council District 11
Sean Silva, Council District 11
Osama Younan, LADBS
Ken Bernstein, Office of Historic Resources

