



September 3, 2024

Submitted Electronically
Los Angeles Cultural Heritage Commission
Commissioner Barry Milofksy
Commissioner Gail Kennard
Commissioner Richard Baron
Commissioner Pilar Buelna
Commissioner Diane Kanner
Email: chc@lacity.org

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RE: CHC-2007-1585-HCM, Barry Building

Dear Commission President Milofksy and Members of the Cultural Heritage Commission,

On behalf of the Los Angeles Conservancy, I urge you to adopt the staff findings to certify the Environmental Impact Report (EIR) and deny the applicant's requested Statement of Overriding Considerations (SOC).

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 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 that would mitigate the harm to this historic resource.

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 the staff report's findings about the limited scope of retrofit and precedent of other similar HCMs. The owner is 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's responsibility in the vacancy and neglect of a known and designated historic building that was previously a thriving community asset. Allowing the owner to demolish the site because of vacancy-related nuisances would incentivize and reward this property owner's negligence of an historic building, as well as any other owner that chooses demolition by neglect of an HCM. 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 should firmly oppose the demolition of this HCM for a vacant lot, and specifically state its objection for a SOC. Adopting a SOC sets a dangerous precedent for how the City values and protects HCMs. We strongly urge the Cultural Heritage Commission to adopt the staff findings and recommend that the L.A. Department of Building and Safety reject the applicant's claims for a SOC.

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.

Please do not hesitate to call me at (213) 430-4203 or email me at asalimian@laconservancy.org.

Sincerely,



Andrew Salimian

Director of Advocacy

cc:

Councilmember Traci Park

Osama Younan, LADBS

