

Appendix A

Draft EIR Comment Letters

3/28/23, 1:25 PM

City of Los Angeles Mail - Request for Extension of Public Comment Time for the Barry Building Demolition DEIR ... (11973 San Vi...



James Harris <james.harris@lacity.org>

Request for Extension of Public Comment Time for the Barry Building Demolition DEIR ... (11973 San Vicente Boulevard Project, ENV-2019-6645-EIR)

Jeff Khau <Jeff.khau@lacity.org>

Wed, Mar 22, 2023 at 12:08 PM

To: James Harris <james.harris@lacity.org>

Cc: "michael.amster@lacity.org" <michael.amster@lacity.org>, Bob Blue <bob.blue@live.com>, Ziggy Kruse <ziggykruse2005@yahoo.com>

Hi Jim,

Some members of the public have requested that the comment period for the DEIR be extended to allow for additional input. This email is to confirm that our office is amenable to a **15-day extension** of the comment period. Please let me know if you have any questions.



Jeff Khau, AICP | Planning Deputy

he/him/his

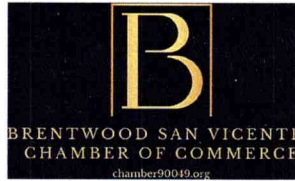
Office of Councilwoman Traci Park ★ 11th District

LA CITY HALL: 200 N. Spring Street, Room 410, LA, CA 90012

(213) 887-5644 TEL



***PLEASE NOTE:** E-mail correspondence with the Office of Councilwoman Traci Park may be subject to public disclosure under the California Public Records Act. *(including attachments)* *



March 27, 2023

James Harris
Los Angeles City Planning
221 N. Figueroa Street, Suite 1350
Los Angeles, CA 90012
E-mail: james.harris@lacity.org

Re: Brentwood San Vicente Chamber of Commerce Support of Barry Building demolition

Dear Mr. Harris,

On behalf of the Brentwood San Vicente Chamber of Commerce, I am writing to express the Chamber's strong support of the demolition of the Barry Building.

The Brentwood San Vicente Chamber of Commerce represents for-profit businesses, professionals and cultural institutions within Brentwood. Our vision is a thriving Brentwood business community with a mission to support policies that enable prosperous, safe, clean and beautiful commercial districts within Brentwood.

The Barry Building, a vacant and seismically unstable building, is not good for Brentwood and Brentwood's business community. The fenced building is a magnet for vandalism and homelessness and is a nuisance to the commercial businesses on San Vicente Blvd. The risk of collapse due to an earthquake is also dangerous for its neighboring businesses. The Barry Building is unprosperous, unsafe, and unclean.

This demolition of the Barry Building creates a blank canvass for a new opportunity and a future development which has the potential to invigorate San Vicente Blvd.'s commercial district. The Chamber stands in firm support of the demolition of the Barry Building.

Please contact Michele Aronson with any questions at (310) 255-7708 or maronson@douglasemmett.com

Sincerely,

Michele Aronson
Director, Brentwood San Vicente Chamber of Commerce



James Harris <james.harris@lacity.org>

Draft Environmental Impact Report for the 11973 San Vicente Boulevard Project, ENV-2019-6645-EIR

1 message

Adrian Fine <afine@laconservancy.org>

Tue, Apr 18, 2023 at 7:38 AM

To: "james.harris@lacity.org" <james.harris@lacity.org>

Dear James Harris:

On behalf of the Los Angeles Conservancy, I am writing to comment on the Draft Environmental Impact Report (EIR) for the [11973 San Vicente Boulevard](#) Project (Project) which impacts the Barry Building, a designated Historic-Cultural Monument (HCM). Thank you and please let me know should you have any questions or need anything else from me and the Los Angeles Conservancy.

I would appreciate receiving receipt from the City on this submission as part of the Draft EIR record.

Thank you and best, Adrian

Adrian Scott Fine

Senior Director of Advocacy

Los Angeles Conservancy

afine@laconservancy.org

-

Pronouns: He / His / Him

Celebrate L.A.'s Legacy Businesses! Join us as the Conservancy explores legacy businesses throughout Los Angeles County, <https://www.laconservancy.org/curating-city-legacy-business>

[laconservancy.org](https://www.laconservancy.org)[E-News](#) – [Facebook](#) – [Twitter](#) – [Instagram](#)**Membership starts at just \$40**[Join the Conservancy today](#)



LOS ANGELES
CONSERVANCY

523 West Sixth Street, Suite 826
Los Angeles, CA 90014

213 623 2489 OFFICE
213 623 3909 FAX
laconservancy.org

April 18, 2023

Submitted Electronically

James Harris
City of Los Angeles, Department of City Planning
221 N. Figueroa Street, Suite 1350
Los Angeles, CA 90012
Email: james.harris@lacity.org

RE: Draft Environmental Impact Report for the 11973 San Vicente Boulevard Project, ENV-2019-6645-EIR

Dear James Harris:

On Behalf of the Los Angeles Conservancy, I am writing to comment on the Draft Environmental Impact Report (EIR) for the 11973 San Vicente Boulevard Project (Project). The Conservancy is extremely concerned by the proposed demolition of the Barry Building, Historic-Cultural Monument (HCM) #887. If approved, the proposed Project would set a dangerous precedent for the City's historic preservation program and threaten the future of more than 1,200 designated HCM's.

In December 2020, the Conservancy outlined in our Notice of Preparation (NOP) comments the problems associated with demolishing a designated HCM for no other purpose than to clear the property without an identified replacement project. Such action creates a dangerous precedent and incentivizes future property owners of other HCMs to pursue similar outcomes, as well as encouraging intentional demolition by neglect. Should the City of Los Angeles approve the proposed demolition of this HCM without a replacement project, it will severely erode protections upheld by the City's long-held historic preservation program, and result in a clear circumvention and piecemeal approach of the California Environmental Quality Act (CEQA).

I. 11973 San Vicente Boulevard, known as the Barry Building, is a designated Historic-Cultural Monument (HCM)

Completed in 1951 and designed by local architect Milton Caughey for owner David Barry, the Barry Building is an excellent example of Mid-Century Modern commercial architecture. The building incorporates elements of the International Style, which include an elevated second story, clean lines, a horizontal orientation, and an interior courtyard with cantilevered stairways.



In 2007, the City of Los Angeles designated the Barry Building as Historic-Cultural Monument #887 because it is an excellent and intact example of Mid-Century Modern Architecture, and met the established criteria established by the City.

II. Demolition by neglect is being used as a tactic to circumvent and piecemeal historic preservation regulations and CEQA.

For nearly fifteen years the property owner, that includes Charles T. Munger, has sought to demolish the historic Barry Building. Redevelopment plans have varied from condominiums to retail complexes, and each of these iterations have included the complete demolition of HCM #887. The current “project” is yet another attempt to demolish this historic landmark, yet without the benefit of analyzing a replacement project.

Countless neighborhood advocates voiced their opposition to the 2012 project which prompted then Councilmember Bill Rosendahl to voice his opposition. At the time, the City released its Final EIR for the Green Hollow Square Project, which called for the demolition of the Barry Building as well as altering the Coral Tree Median (HCM #148). Throughout the EIR process a clear preservation alternative emerged that would have allowed for the retention and reuse of the Barry Building alongside proposed new development. The owner rejected this despite its meeting a majority of identified project objectives. Unwilling to compromise or consider alternatives, in 2013 the owners requested to withdraw their zoning entitlements request, thus ending the proposed Green Hollow Square Project.

Through a pattern and practice of evicting tenants and intentional neglect of the property, in 2016, the property owners used seismic concerns as a means to clear out the remaining commercial tenants from the property and fence it off. Since this eviction action, the property has remained boarded up and neglected, and character-defining features removed from the façade without approval and required design review by the City’s Office of Historic Resources. This includes character-defining features such as metal window shutters have been removed or disappeared from the property. Again, this action was not approved or reviewed by the City’s Office of Historic Resources staff, and appears to have been done to further make the building appear to be an “eyesore” for the community.

This culmination of actions reflect an intentional and orchestrated demolition by neglect approach, which occurs when property owners intentionally allow a historic property to suffer severe deterioration, potentially beyond the point of repair. Property owners who take this approach often use it as a means to circumvent historic preservation regulations and to later justify total demolition of historic resources, following deferred or intentional actions that compromise a historic building. Should the City reward this behavior by granting demolition of the Barry Building, it is setting a dangerous precedent for future proposed demolitions of Los Angeles’s historic resources. Such actions are occurring with greater frequency so we urge the City to stand firm in this case and pursue actionable demolition by neglect deterrents, and reject unfounded arguments by the property owner that claim preservation alternatives are not viable.



III. Refusal to comply with City’s mandatory soft-story seismic retrofit ordinance(s) is no excuse for approval to demolish

On May 1, 2016, the owners of the Barry Building decided to vacate the Barry Building, evict all remaining tenants at that time, and fence off the structure which marked the beginning of the process to ensure this property would be a nuisance and “eyesore” to the community (see attachment). The excuse stated then was the City’s notice to comply with the mandatory soft-story seismic retrofit. The Draft EIR states this order was first issued in March, 2018¹. Now, seven years later and near the end of the time to comply, it appears the owner is intentionally “running the clock” on this order as a deliberate means to attempt to receive approval to demolish a designated Historic-Cultural Monument (HCM).

Throughout Los Angeles are buildings built before current building code standards that are classified as soft-story construction. Without strengthening, these types of structures are vulnerable during earthquakes and possible structural failure. This includes the Barry Building, however these deficiencies do not call for or warrant demolition, only retrofit. Per the City’s analysis and records, and provided through April 1, 2023², 12,433 total soft-story buildings exist across Los Angeles. To date, seventy percent (8,722) of these buildings have now complied with the mandatory requirements and city’s ordinances for structural retrofits. Another fifteen percent of soft-story buildings have permits issued already and are awaiting for the retrofit work to be completed. Overall, ninety-five percent (11,820) of soft-story buildings and their owners have either initiated plans, have permits issued, or completed the work. Slightly less than five percent (633) of owners of soft-story buildings have done nothing to comply, which presumably includes the owners of the Barry Building. How is it that ninety-five percent of soft-story buildings have been able to meet this mandatory requirement but not the Barry Building and its ownership?

City ordinance 183893 (approved November 15, 2015) and 184081 (approved February 1, 2016) that outline the City’s mandatory soft-story seismic retrofit requirements allow for flexibility and specifically call out “qualified historic buildings” and state they “shall comply with requirements of the California Historical Building Code established under Part 8, Title 24 of the California Code of Regulations.” This provides additional flexibility should owners pursue this option.

Within the Draft EIR and Alternatives section, statements are made that the soft-story seismic retrofit requirements only applies to the south wing on the building, and does not affect the east, north or west wings of the building. While additional structural deficiencies may be needing to be addressed there, there is no limitation to completing this scope. This demonstrates the required work is isolated and therefore can be effectively addressed to meet the City’s order to comply without calling for the demolition of the Barry Building.

IV. Identified alternatives to the proposed demolition of the Barry Building must be selected, including Alternative 2, the environmentally superior alternative

Demolition of the Barry Building without a replacement project is a blatant violation of CEQA. The proposed project is completely unnecessary and an effort to circumvent historic preservation regulation for its future development. It is the City’s duty as the lead agency to deny the proposed project as stated by CEQA law. As with the previous, proposed Green Hollow Square Project, a

¹ DEIR, Alternatives, Page V-1.

² City of Los Angeles, Department of Building and Safety, https://www.ladbs.org/docs/default-source/publications/misc-publications/soft-story-compliance-report.pdf?sfvrsn=bbe9f553_144



preservation alternative remains feasible for the applicant. Such an alternative works in tandem with new development. Historic Preservation and new development are not mutually exclusive. Successful preservation for the Barry Building is a “win-win” solution whereby the historic building can be rehabilitated and sensitive new development may occur on the vacant portion of the parcel.

The Draft EIR identifies Preservation Alternative 2 as the environmentally superior alternative. It would meet both of the project objectives and comply with the City’s soft-story seismic retrofit ordinance(s), which includes complying with the requirements under LAMC Section 91.9305.2 and abate fire, loitering, vandalism, and other public safety hazards associated with structural defects and current vacancy of the Barry Building. The Draft EIR specifically states:

Alternative 2 would not conflict with policies related to historic preservation, as Alternative 2 involves the preservation of the existing building and would not affect the historic significance of this building with the recommendations provided by Historic Resources Group (in the memo contained in Appendix H-7 of this Draft EIR). Therefore, Alternative 2’s impacts with respect to land use and planning would be less than significant, and less than the Project’s significant and unavoidable land use impact.

The Draft EIR also explicitly states it is not analyzing the economic feasibility of Alternative 2, therefore any claims by the owners and their representatives of infeasibility are not a part of this environmental review process. The Conservancy welcomes an opportunity to meet and review any documentation and studies, however any findings of infeasibility must be verified by substantial evidence and made available to the public.

A key policy under the California Environmental Quality Act (CEQA) is the lead agency’s duty to “take all action necessary to provide the people of this state with historic environmental qualities and preserve for future generations examples of major periods of California history.”³ To this end, CEQA “requires public agencies to deny approval of a project with significant adverse effects when feasible alternatives or feasible mitigation measures can substantially lessen such effects.”⁴ The fact that an environmentally superior alternative may be more costly or fails to meet all project objectives does not necessarily render it infeasible under CEQA.⁵ Reasonable alternatives must be considered “even if they substantially impede the project or are more costly.”⁶ Likewise, findings of alternative feasibility or infeasibility must be supported by substantial evidence.⁷

V. Conclusion

As we have consistently stated, in our NOP comments and within this Draft EIR, the Conservancy strongly opposes the demolition of the historic Barry Building HCM #887. The proposed demolition with no replacement project is an attempt to circumvent CEQA law and therefore must be denied by

³Public Resource Code, Sec. 21001 (b), (c).

⁴ *Sierra Club v. Gilroy City Council* (1990) 222 Cal.App.3d 30, 41; also see Public Resources Code §§ 21002, 21002.1.

⁵ Guideline § 15126.6(a).

⁶ *San Bernardino Valley Audubon Soc’y v. County of San Bernardino* (1984), 155 Cal.App.3d 738, 750; Guideline § 15126(d)(1).

⁷ Public Resources Code § 21081.5.



the lead agency. The owners and representatives have stated in public meetings that they intend to market the property once the Barry Building is demolished, again demonstrating a piecemeal approach to required environmental review and necessary efforts to lessen impacts. For nearly fifteen years the Conservancy has advocated for “win-win” solutions for the Barry Building and we remain committed to this outcome.

Preservation Alternative 2 is the environmentally superior alternative and the City, as the lead agency, must select this as it meets project objectives and impacts with respect to land use and planning would be less than significant, and less than the project’s significant and unavoidable land use impact. The proposed demolition of the Barry Building is unnecessary and unwarranted, as demonstrated in the Draft EIR, and will create a harmful precedent for historic buildings in Los Angeles.

Otherwise such a precedent undermines all efforts of the Office of Historic Resources and the City’s historic preservation program, and actually reward owners that intentionally neglect their properties (demolition by neglect) and make them a nuisance to adjacent neighbors and the entire community. This action also appears to be also in conflict with Council File No: 17-0226-S1 regarding "Unpermitted Remodels, Additions and Demolitions of Buildings / Monetary Penalties" which is pressing for stronger demolition deterrents and greatly needed. The City should also not be approving demolitions until an approved and proposed project is ready to proceed; otherwise we will likely be left with empty lots citywide where nothing occurs, creating a new type of nuisance.

The Conservancy continues to welcome an opportunity to work with the City and the applicant to determine how potential Preservation Alternative 2 and other “win-win” outcomes can be achieved for the Barry Building.

About the Los Angeles Conservancy:

The Los Angeles Conservancy is the largest local historic preservation organization in the United States, with nearly 5,000 members 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 contact me at (213) 430-4203 or afine@laconservancy.org should you have any questions or concerns.

Sincerely,



Adrian Scott Fine
Senior Director of Advocacy

cc: Councilmember Traci Park
Office of Historic Resources
Brentwood Community Council



BARRY BUILDING
11973 San Vicente Blvd.
Los Angeles, CA 900049

To: Tenants of the Barry Bldg.
From: Building Ownership
Date: May 1, 2016

After careful consideration, we have decided to close the Barry Bldg. as soon as reasonably possible and no later than December 31, 2016. Why now? Many of you are perhaps aware that the City of Los Angeles has a major earthquake preparedness effort underway to identify so called "soft buildings" and to force their structural shortcomings to be addressed. Such buildings, due to open construction on the ground floor and obsolete building techniques and engineering assumptions, are deemed to lack adequate support and in an earthquake might fold up. Some may recall photographs of apartment buildings where the "soft" ground floor garages folded in the last major earthquake. We have recently received a letter from the City identifying the Barry Bldg. as a "soft" structure. This notice starts the clock running on a legal process that will ultimately require the Barry Bldg. to be reinforced to code or demolished. Either of these events will require the building to be vacated. More importantly, and the cause of our decision to close the building immediately, the clear import of the City's letter is that the building has been determined to be substandard for earthquakes, meaning that all users of the Barry Bldg. could be at potential risk. We are unwilling to operate under this cloud.

At days' end, we all know the Barry Bldg. has been beyond its useful life for years. All good things do come to an end, and that time is now. While we have no obligation to you beyond following legal procedures, we wish to accomplish this sad task without fuss and rancor, and to assist you financially to make the process go more easily for you. To this end, we have decided to offer an incentive to tenants in good standing who: (1) vacate by June 30, in which case we will refund all 2016 rent paid; or (2) vacate after June 30 and prior to November 30, in which case we will refund one month's 2016 rent paid for each full calendar month by which the tenant has vacated prior to December 31. For example, a tenant who vacates by August 31 would receive a refund of four months 2016 paid rent. No rent refunds will be made to tenants in possession after November 30, nor to tenants in default. Rent refunds, in addition to any security deposit, will be paid upon our being handed the keys, with the surrendered space left broom clean and free of all tenant fixtures, furnishings, equipment, debris, etc. To qualify for this program, a lease termination agreement must be agreed and signed between us by June 30. Please call Ms. Phyllis Bell at 323-930-9498 if you wish to participate, and an agreement will be prepared and sent to you for consideration and execution.

Our decisions are final. We will not negotiate for more money or more time. We can and will resort to legal process if we are forced to, and plan to start eviction proceedings after June 30 with tenants who have not signed lease termination agreements, and immediately as to any tenants now in default. We hope that a mutual spirit of acceptance and good will can guide us all to a successful and early closure of the Barry Bldg., and we wish you all the best in the future.

Sincerely,

Building Ownership



South Brentwood Residents Association

149 South Barrington Ave. #194
Los Angeles, California 90049
www.southbrentwood.org

February 27, 2023

VIA EMAIL AND U.S. MAIL

James Harris
Major Projects Section
Los Angeles City Planning
221 N. Figueroa Street, Suite 1350
Los Angeles, CA 90012
E-mail: james.harris@lacity.org

Re: SUPPORT for Case No. ENV-2019-6645-EIR - Demolition of the Barry Building, 11973-11975 San Vicente Boulevard, Los Angeles, California 90049

Dear Mr. Harris:

I am writing on behalf of the Board and members of the South Brentwood Residents Association ("SBRA"), which represents approximately 18,000 homeowners and renters who reside in the area south of San Vicente Blvd., north of Wilshire Blvd., east of Centinela Ave. and west of Federal Ave., including all residents living in multi-family dwellings throughout the entire Brentwood community.

SBRA is the only residents' group that represents the homeowners and renters who live adjacent to the location of the subject property, 11973-11975 San Vicente Boulevard, Los Angeles, California 90049 (the "Barry Building").

The Barry Building has been vacant and fenced since 2017, and we have been apprised that is structurally unfit and likely to suffer severe damage in an earthquake. The Barry Building also poses a risk of vandalism, loitering and other public safety hazards because it is a vacant building. SBRA supports the demolition of the Barry Building to eliminate these risks and to keep the surrounding community safe.

SBRA also views the demolition of the Barry Building as a first step to constructing a thoughtful development on the property which enhances the community and is consistent with the San



Vicente Scenic Corridor Design parameters and other requirements. SBRA looks forward to commenting on a design in the future that meets these requirements, and which ideally provides the community with some much needed public meeting and green space.

Please keep us apprised of all future applications to develop this property.

Sincerely,

Alisa M. Morgenthaler

Alisa M. Morgenthaler
President
South Brentwood Residents Association

cc: Mike Ai (via e-mail)
Carolyn Jordan (via e-mail)

BRENTWOOD RESIDENTS COALITION
zoning | land use | planning | environmental

April 18, 2023

James Harris
 City of Los Angeles
 Department of City Planning
 221 N. Figueroa Street, Suite 1350
 Los Angeles, CA 90012
 Via email: james.harris@lacity.org

**Re: Opposition to Demolition of Historic-Cultural Monument #887
 ENV-2019-6645-EIR; SCH 2020110210, 11973 San Vicente Blvd.**

Dear Mr. Harris:

The Brentwood Residents Coalition (“BRC”)¹ writes in opposition to the demolition of the Barry Building, a designated Historic-Cultural Monument (“HCM”) #887, lauded for its excellent example of Mid-Century Modern Architecture. The Applicant seeks to remove the HCM to clear the lot without an identified replacement project. This type of action is irreversible and creates a dangerous precedent that would serve as an example to future property owners to engage in similar activities that erode protections upheld by the City’s historic preservation program. Demolition of the Barry Building without a replacement project is a blatant violation of the California Environmental Quality Act (“CEQA”).

The Applicant has made clear his intent to tear down the historic building and replace it with an empty lot similar to several adjacent lots held by the same owner that have been sitting empty for close to a decade. All of these parcels were slated for redevelopment as part of the previously proposed Green Hollow Square project, however they have now been systematically leveled in a piecemeal fashion. The Barry Building would be the last of these parcels to be demolished.

The City should not reward the Applicant for piecemealing the project and attempting to circumvent preservation regulations meant to protect valuable and unique historic resources.

¹ BRC is a grass roots, non-profit advocacy group whose purposes are to preserve and enhance the environment and quality of life in Brentwood, to protect the integrity of residential neighborhoods, to assist with planning, to uphold zoning and municipal codes, to encourage traffic and fire safety, and to educate the public on issues that affect quality of life and the environment.

BRENTWOOD RESIDENTS COALITION

CEQA requires public agencies to deny approval of a project with significant adverse effects when feasible alternatives or feasible mitigation measures can substantially lessen such effects. In this case, feasible alternatives to the proposed demolition of the Barry Building must be considered.

BRC urges the City of Los Angeles to reconsider its current environmental review process for this proposal, abandon the process until a replacement project is identified and can be analyzed, in addition to the full exploration of adaptive reuse alternatives. The proposed demolition of the Barry Building is premature and will create a harmful precedent that will put this and future historic resources at risk.

Please add this letter to the record and add BRC to the notification list for this Project.

Thank you for your consideration,

A handwritten signature in black ink, appearing to read 'W. Rosen', with a stylized, flowing script.

Wendy-Sue Rosen, President
Brentwood Residents Coalition

cc: City Councilmember Traci Park
Planning Director Vince Bertoni
City Clerk Holly Wolcott



February 13, 2023

City Planning Commission

cpc@lacity.org

Dear City Planning Commission,

We are writing to you regarding the Barry Building at 11973 San Vicente Blvd, case number ENV-2019-6645-EIR. We support the demolition of the long vacant property and its redevelopment into rental properties. The greater Los Angeles region is facing a severe housing shortage, particularly affordable housing. Creating new housing in this neighborhood, in a high opportunity area, will help to reduce issues of gentrification and displacement. Abundant Housing LA believes that these housing challenges can only be addressed if everyone in the region does their part.

The property is in an excellent location to develop housing. Situated in a highly walkable neighborhood with many restaurants, shops, and schools, the property is also close to UCLA, a major employment center. New housing will benefit Brentwood and the surrounding area far more than an empty office building, and we urge your support for the demolition of the Barry Building.

Best Regards,

Leonora Camner

Leonora Camner
AHLA Executive Director

Jaime Del Rio

Jaime Del Rio
AHLA Field Organizer

Tami Kagan-Abrams

Tami Kagan-Abrams
AHLA Project Director

4/18/23, 2:39 PM

City of Los Angeles Mail - RE: Comments on the Draft Environmental Impact Report (DEIR) for ENV-2019-6645-EIR; SCH 202011...



James Harris <james.harris@lacity.org>

RE: Comments on the Draft Environmental Impact Report (DEIR) for ENV-2019-6645-EIR; SCH 2020110210; 11973 San Vicente Boulevard Project; The Barry Building (HCM #887) ...

Ziggy Kruse <ziggykruse2005@yahoo.com>

Tue, Apr 18, 2023 at 2:27 PM

Reply-To: Ziggy Kruse <ziggykruse2005@yahoo.com>

To: James Harris <james.harris@lacity.org>

Cc: Councilmember Park <councilmember.park@lacity.org>, Jeff Khau <jeff.khau@lacity.org>, Bob Blue <bob.blue@live.com>, Ziggy Kruse <ziggykruse2005@yahoo.com>

Good Afternoon, Mr. Harris:

Attached to this email please find our Comment Letter to the DEIR for ENV-2019-6645-EIR; SCH 2020110210; [11973 San Vicente Boulevard](#) Project; The Barry Building (HCM #887).

Please confirm receipt of this email and attachment, and please add the letter to file for this case.

Thank you.

Sincerely,
Ziggy and Bob Blue



2023-04-18_FINAL Comment Letter on Barry Building Draft EIR.pdf
6525K

Robert Blue & Sieglinde Kruse Blue
640 South Saltair Ave
Los Angeles, CA 90049

bob.blue@live.com

ziggykruse2005@yahoo.com

April 18, 2023

Via EMAIL to:

james.harris@lacity.org

☐☐☐

councilmember.park@lacity.org

jeff.khau@lacity.org

James Harris
City of Los Angeles
Department of City Planning
221 N. Figueroa Street, Suite 1350
Los Angeles, CA 90012

RE: Comments on the Draft Environmental Impact Report (DEIR) for
ENV-2019-6645-EIR; SCH 2020110210;
11973 San Vicente Boulevard Project

Dear Mr. Harris:

We are submitting the below listed comments in response to the Draft Environmental Impact Report (DEIR) for 11973 San Vicente Boulevard Project, ENV-2019-6645-ENV (The Barry Building).

In the above referenced case, the applicant is seeking the City's approval for a Permit to demolish the Barry Building, a significant Historic-Cultural Monument in Los Angeles (HCM #887).

In the June 7, 2012 letter from the Cultural Heritage Commission regarding protecting the Barry Building from demolition in the Green Hollow Square Project (ENV-2009-0165-EIR), Commissioner Richard Barron stated:

"Any concerted effort to purposefully demolish a Historic-Cultural Monument for a replacement project is unacceptable. Pursuing the demolition of the Barry Building imperils the

James Harris
City of Los Angeles, Department of City Planning
221 N. Figueroa Street, Suite 1350
Los Angeles, CA 90012
April 18, 2023

over 1,000 Historic-Cultural Monuments in the City of Los Angeles and sets a dangerous precedent."

In the case of this DEIR, there is **no replacement project**, which makes this proposed demolition far worse.

In the same letter, Mr. Barron also wrote:

"When designated as a Historic-Cultural Monument, the Barry Building met Cultural Heritage Ordinance criteria for "embodying the distinguishing characteristics of an architectural type specimen, inherently valuable for a study of a period style or method of construction" as an example of International Style commercial architecture. Apart from the potential loss of the designated historic resource, the Barry Building is one of the few very rare examples of commercial mid-twentieth century modern design in the register of Historic-Cultural Monuments. In fact, a preliminary review suggests that the Barry Building is only one of three modernist commercial buildings out of over 1,000 designated Historic-Cultural Monuments: the only other two are the Neutra Office Building (HCM #676; constructed 1951) and the Jones and Emmons Building (HCM #696; constructed 1954)."

The destruction of an HCM is a City-Wide issue

The applicant and City are presenting the demolition of the Barry Building as a sole "project." However, City Planning staff told us, "there is no project."

What makes the DEIR for demolition more egregious is that there is no replacement to give any justification for the approval of a demolition permit.

There is no upside for the City or its residents to allow the demolition and irreversible loss of a Historic resource. It would be a dereliction of duty for the City leadership to approve a

James Harris
City of Los Angeles, Department of City Planning
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Los Angeles, CA 90012
April 18, 2023

demolition permit for the Barry Building and leave the neighborhood with another fenced-in dirt lot to go along with the applicant's other five (5) surrounding fenced-in dirt lots.

Another fenced-in dirt lot will negatively impact the City and the local neighborhood and is an inferior environmental alternative.

Furthermore, demolition of the Barry Building without a replacement project is a blatant violation of CEQA. The proposed project is completely unnecessary and an effort to circumvent historic preservation regulation for its future development. It is the City's duty as the lead agency to deny the proposed project as stated by CEQA law.

Since the applicant is not offering a replacement project that will provide a benefit to the City and its residents, the City must deny a demolition permit for the Barry Building and wait until a replacement project is applied for either by the applicant or subsequent new owner. Then the City and the Public can review the environmental impacts and weigh the benefits of new construction jobs, permanent jobs, increased revenue, and amenities for local businesses to create walkable areas along the San Vicente Scenic Corridor.

A replacement project would allow the applicant to incorporate the Barry Building as centerpiece of a new development to highlight and celebrate the history of the building and its original owner, David (Dave) Barry.

Please note, that **Attachment F** includes a variety of documents and photos that are related to the DEIR and our issues raised within this letter.

James Harris
City of Los Angeles, Department of City Planning
221 N. Figueroa Street, Suite 1350
Los Angeles, CA 90012
April 18, 2023

The Historical Connection between The Barry Building and The Coral Tree Median, two historic-cultural monuments

Mr. Barry played a key part in the development of another historic resource along the San Vicente Median, HCM #148, Coral Trees. The Coral trees along the San Vicente were adopted as a Historic-Cultural Monument on March 3, 1976.

After the red car line running along the Brentwood median was removed in the 1940s, the community resolved to plant trees where the tracks once lay. Horticulturist Samuel Ayres, **David Barry**, and Hugh Evans persuaded the city to plant coral trees, native to South Africa, for their remarkable beauty. It's said that the trees originally began as rooted cuttings from Hugh Evans, owner of the well-known Evans and Reeves Nursery on Barrington Ave.

The median and Coral trees are fully visible from the Barry Building offices and courtyard and are an integral part of the Barry Building property.

This shows that David Barry was not only invested in the community, but also its beautification and its culture.

Mr. Barry also constructed another development that became home to a nursery in the west section of the Barry Building parcel. The nursery opened at the same time as the Barry Building and specialized in introducing new varieties of palms to Southern California. The nursery site consisted of a front gable greenhouse, with an open garden area located behind. California Jungle Gardens occupied the space from 1951 into the 1980s. (*ENV-2019-6645-EIR , DEIR, Appendix C-1*)

California Jungle Garden was replaced by "Trellis Florist", another botanical shop. The Fishtail Palm Trees that were once raised there grew through the pots they were planted in and rooted themselves into place and created a unique, secluded paradise.

Just a little west of the flower shop and the Barry Building was the Bonner School, which was located at 11991 San Vicente Blvd.

James Harris
City of Los Angeles, Department of City Planning
221 N. Figueroa Street, Suite 1350
Los Angeles, CA 90012
April 18, 2023

The applicant completely demolished the Bonner School Building in 2014 along with 3 other structures that were part of the now "withdrawn" Green Hollow Square Project, which is elaborated in detail below.

The Applicant Used Piecemealing in its Prior Demolition Activities

The true scope of the current application is more than what has been presented in the DEIR. The demolition permit for the Barry Building is only a piece of the "whole of the contemplated action" which the DEIR failed to attempt to address.

We raised the issue of piecemealing on page 2 of our NOP comment letter. Others have also raised this issue in their NOP comments.

However, the DEIR project description remains unchanged from its limited scope stated in the NOP, despite objections raised in NOP comments.

The project description remains defective for failing to acknowledge that it is merely one more step within a sequence of steps that already have occurred to clear an assemblage of land shown to be owned and/or controlled by the same people.

Unless the applicant commits to the preservation of raw undeveloped land for a significant period, the public and the decision makers cannot reasonably accept any intended presumption that the sequential demolition of all of the buildings located on the assemblage that has already occurred of which the Barry Building is the most recent component, is anything less than one more component part of one whole "redevelopment of the assemblage."

The demolition of the two single-family homes and two commercial buildings were part of the Green Hollow Square Project entitlement application and description. Demolition permits were applied for prior to approvals and prior to the Green Hollow Square project being withdrawn. Demolition continued after the project was withdrawn on October 31, 2013.

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April 18, 2023

There was no reason to demolish 4 out of 5 of the structures on the applicant-owned parcels slated for removal for the Green Hollow Square project:

- The soft-story ordinance did not apply to these structures.
- There were no code enforcement citations for the 4 properties.

A portion of the applicant's Green Hollow Square Project, Case No. ENV-2009-1065-EIR, states: ***"The proposed project involves demolition of all existing buildings on the project site, which include five commercial structures and two single-family dwellings. One of the commercial structures, known as the "Barry Building" was designated as a Historic-Cultural Monument in 2007 (Monument No. LA-887)."***

Attached to this letter is a PDF document showing common ownership information for all the parcels owned by the applicant. (Attachment A)

Chronology of Demolition that ties into the work described in the Green Hollow Square Project:

10/2/2007: LA City Council Adopts HCM for the Barry Building.

The recommendation by the Cultural Heritage Commission for the Barry Building to become a Historic-Cultural Monument (#887) was adopted by a unanimous vote of the Los Angeles City Council. (Attachment B)

Note: The owner/applicant did not appeal this decision. Ownership of Properties remained the same throughout the timeline.

04/12/2010: NOP for DEIR Submitted to State Clearing House as Brentwood Town Green (Later renamed Green Hollow Square), SCH No. 2009061062, Case No. ENV-2009-1065-EIR

07/11/2013: 11977 San Vicente Blvd

PRE-INSPECTION DEMO PERMIT (Permit No. 13019-30000-01836) submitted for Two, 1-Story Commercial Buildings
The demolition of these Commercial Buildings was originally part of the Green Hollow Square project.

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April 18, 2023

07/11/2013: 642 and 644 S. Saltair Ave

PRE-INSPECTION DEMO PERMIT (Permit No. 13019-30000-01833)
submitted for **Two single family dwellings**
The demolition of these homes was originally part of the Green Hollow Square project.

08/23/2013: 642 and 644 S. Saltair Ave

DEMO PERMIT SUBMITTED (Permit No. 13019-30000-02208) for Two single family dwellings.
The demolition of these homes was originally part of the Green Hollow Square project.

8/23/2013: 11977 San Vicente Blvd

DEMO PERMIT SUBMITTED (Permit No. 13019-30000-02218) for 1-Story Commercial Building
The demolition of this Commercial Building was originally part of the Green Hollow Square project.

8/23/2013: 11991 San Vicente Blvd

DEMO PERMIT SUBMITTED (Permit No. 13019-30000-02221) for 1-Story Commercial Building
The demolition of this Commercial Building was originally part of the Green Hollow Square project.

10/31/2013: GREEN HOLLOW SQUARE PROJECT WITHDRAWN

02/13/2014: 642 and 644 S. Saltair Ave

DEMO PERMIT ISSUED (Permit No. 13019-30000-02208) for Two single family dwellings
The demolition of these homes was originally part of the Green Hollow Square project.

02/13/2014: 11977 San Vicente Blvd

DEMO PERMIT ISSUED (Permit No. 13019-30000-02218) for 1-Story Commercial Building
The demolition of this Commercial Building was originally part of the Green Hollow Square project.

02/13/2014: 11991 San Vicente Blvd

DEMO PERMIT ISSUED (Permit No. 13019-30000-02221) for 1-Story Commercial Building
The demolition of this Commercial Building was originally part of the Green Hollow Square project.

James Harris
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221 N. Figueroa Street, Suite 1350
Los Angeles, CA 90012
April 18, 2023

08/22/2014: 642 and 644 S. Saltair Ave

DEMO PERMIT FINALED (Completion) (Permit No. 13019-30000-02208)
for Two single family dwellings
The demolition of these homes was originally part of the Green Hollow Square project.

3/9/2016: 11977 San Vicente Blvd

DEMO PERMIT FINALED (Completion) (Permit No. 13019-30000-02218)
for 1-Story Commercial Building
The demolition of this Commercial Building was originally part of the Green Hollow Square project.

05/18/2017: 11991 San Vicente Blvd

DEMO PERMIT FINALED (Completion) (Permit No. 13019-30000-02221) for
1-Story Commercial Building
The demolition of this Commercial Building was originally part of the Green Hollow Square project.

09/18/2019: 11973 San Vicente Blvd (Barry Building)

PRE-INSPECTION DEMO PERMIT (Permit No. 19019-10000-04750)
submitted.

11/06/2019: 11973 San Vicente Blvd (Barry Building)

DEMO PERMIT (Permit No. 19019-10000-05593)

11/18/2020: 11973 San Vicente Blvd (Barry Building)

Notice of Preparation (NOP) for 11973 San Vicente Blvd Project

02/16/2023: 11973 San Vicente Blvd (Barry Building)

Notice of Completion and Availability of DEIR

Self-Imposed Blight Through Demolition and Neglect

After the applicant withdrew the Green Hollow Square project entitlements on October 31, 2013, the applicant demolished two single family homes on Saltair Avenue and two commercial buildings on San Vicente Blvd. The relative locations of these structures are shown on the accompanying attachments to this letter.

As mentioned previously, the demolition was not necessary unless it was an effort to continue the plan revealed in the Green Hollow Square Project.

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April 18, 2023

The fenced-in empty lots now became visual blight and do not conform to the Specific Plans and guidelines of the City.

Furthermore, they create public safety and health issues by having empty lots become areas of easy access to other commercial and residential properties.

The community has been living with these conditions for almost a decade and it all could have been avoided if the applicant did not take a scorched earth approach in demolishing the 4 structures he owned.

Along San Vicente Blvd, the two demolished commercial buildings create unsafe areas for all pedestrians including those with accessibility issues, seniors, and parents with strollers. At night the area is now dark and the extremely uneven sidewalks become tripping hazards.

The responsibility for the neglect and lack of maintenance and upkeep of the Barry Building lies purely with the applicant who created this issue in the first place. You can see the difference of how the Barry Building appears today with what it looked like before the tenants were evicted and the building was boarded up. (Attachment C)

Other Issue with the DEIR

The DEIR is incomplete as City omitted important correspondence from members of the public

The DEIR's Executive Summary includes a list of agencies and individuals who had submitted comments on the NOP for this project. **(Executive Summary, PAGE I-4)**

We read the comments submitted by individuals and noticed that an email from "Lisa Avebury" on behalf of the **Los Angeles Conservancy** was not only undated, but also truncated on the right side leaving out a majority of the email text.

James Harris
City of Los Angeles, Department of City Planning
221 N. Figueroa Street, Suite 1350
Los Angeles, CA 90012
April 18, 2023

Also, the small font made it illegible to read. This particular document is located on PDF pages 162-163 of the DEIR's Appendix A-3 - NOP Comments).

After reaching out to City Planning staff we were provided via email with a clean and clear **original** letter from the LA Conservancy, dated December 21, 2020 and signed by Adrian Scott Fine, Director of Advocacy. (*Attachment D*)

The omission of the letter referenced above from the LA Conservancy also negates participation in the CEQA process by not including an NOP Comment letter, one that City Planning clearly had possession of.

Also, the omission of this important letter from the LA Conservancy also raises the question: Are there other NOP comment letters that the city has omitted from the DEIR?

The decision makers for this case do not have the full and complete DEIR in front of them and therefore cannot make a fully informed decision when reviewing this case.

Based on the comments listed above, the City has an obligation to address the following concerns:

- I. The City needs to explain its odd process of leaving out the full letter
- II. The city needs to explain its odd process of not fully responding to our inquiries, and
- III. City's need to fulfill its mandatory obligation to fully respond to the contents of the NOP comment letter from Mr. Adrian Fine, for the LA Conservancy, dated December 21, 2020.

**Insufficient And Therefore Defective "NOTICE OF DEMOLITION"
Posted At Project Site 11973 San Vicente Boulevard**

Per **Los Angeles Ordinance # 185270**, which became effective on January 10, 2018, the applicant had an obligation to post a placard

James Harris
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April 18, 2023

that met the city's prescribed guidelines. **Ordinance # 185270, 91.106.4.5.1.** (2) *Notification of Demolition* states, in part:

*2. The applicant shall post a placard on the property where the demolition will occur, in a conspicuous, visible place, within 5 feet of the front property line, **describing the date of the application for demolition pre-inspection** and meeting the following standards ... (bold and italic added for emphasis)*

After careful inspection of the posted placard, it shows that the applicant did not comply with the prescribed portions of the ordinance that requires the applicant to describe "**the date of the application for demolition pre-inspection**". (Attachment E)

Therefore, based on the placard posted at the project site, the public did not have a way of knowing when the original application for demolition was submitted to the City of Los Angeles by the Applicant.

Furthermore, based on **Ordinance # 185270, 91.106.4.5.1. (3) Notification of Demolition**, the **City's Planning Department failed to verify** the placement and accuracy of the placard. Even if it did verify the location, the Department failed to notice that the placard was insufficient as it lacked the date of the application for demolition pre-inspection.

Conclusion

The public has a vested interest in all Historic-Cultural Monuments and the City and its leadership have a responsibility to protect Historic Resources such as the Barry Building, especially when there is no replacement project to consider.

The Decision makers of the City have an obligation to follow the law and deny the demolition permit instead of putting the financial interests of the applicant over the health and safety of all the residents of Los Angeles.

James Harris
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April 18, 2023

Doing the right thing will allow the applicant to come back and work with the City, preservation groups, and others to preserve and protect the Barry Building for inclusion into a future inevitable project either by the original applicant or by subsequent owners.

Thank you for your time and consideration of our comments when making your decision.

Sincerely,


Robert Blue


Sieglinde Kruse Blue

ATTACHMENT
A

Table of Assembly of Property Parcels

Ref #	Parcel (AIN)#	Address	Ownership	Sale Date	Demo Permit #	Demo Date (Finaled)
1	4404-025-008	11973 San Vicente Blvd	11973 San Vicente, LLC Charles T Munger; William Harold Borthwick (Mangers/Members)	12/26/2006, Owner Transfer: 4/20/2017, Quit Claim	19019-10000-04750 & 19019-10000-05593	NOT FINALED, Under CEQA/EIR (Barry Building)
2	4404-025-009	11977 San Vicente Blvd	11973 San Vicente, LLC Charles T Munger; William Harold Borthwick (Mangers/Members)	12/26/2006 (Owner Transfer: 4/20/2017 Quit Claim)	13019-30000-02218 & 13019-30000-02219	3/10/2016 (Issued on 02/13/2014)
3	4404-025-010	11991 San Vicente Blvd	11991 San Vicente, LLC Charles T Munger; William Harold Borthwick (Mangers/Members)	10/20/2006, Owner Transfer: 4/20/2017, Quit Claim	13019-30000-02220 & 13019-30000-02221	05/19/2017 (Issued on 2/13/2014)
4	4404-025-015	No Address	11973 San Vicente, LLC Charles T Munger; William Harold Borthwick (Mangers/Members)	12/26/2006 (Owner Transfer: 4/20/2017 Quit Claim)	N/A: No Structure	N/A: No Structure
5	4404-025-016	No Address	11973 San Vicente, LLC Charles T Munger; William Harold Borthwick (Mangers/Members)	12/26/2006, Owner Transfer: 4/20/2017, Quit Claim	N/A: No Structure	N/A: No Structure

Table of Assembly of Property Parcels

Ref #	Parcel (AIN)#	Address	Ownership	Purchase Date	Demo Permit #	Demo Date (Finaled)
6	4404-025-027	644 S Saltair Ave	11991 San Vicente, LLC Charles T Munger; William Harold Borthwick (Mangers/Members)	6/09/1989, Owner Transfer: 04/20/2017 Quit Claim	13019-30000-02217	8/26/2014
7	4404-025-028	642 S Saltair Ave	11991 San Vicente, LLC Charles T Munger; William Harold Borthwick (Mangers/Members)	10/24/1989, Owner Transfer: 04/20/2017 Quit Claim	13019-30000-02208	8/26/2014
8	4404-026-008	11901 Saltair Terrace	11991 San Vicente, LLC Charles T Munger; William Harold Borthwick (Mangers/Members)		07019-30000-00349	3/29/2007

Parcel Map
Showing Parcels owned by
Applicant

4404

25

SHEET

P.A.
1696-25

TRA
67

REVISED
10-2-59
10-5-61

12-8-61
12-14-62
670310

680313
721109
830603305-84

2018

PG
26

Ref # 8

parcel #: 4404-26-008

MAPPING AND GIS
SERVICES
SCALE 1" = 80'

MOST S COR TR NO 13063

Ref # 4

Ref # 5

Ref # 7

Ref # 6

Ref # 3

Ref # 2

Ref # 1

PG
23

SALTAIR

SAN VICENTE

SE LINE OF
TR NO 12538

PG
27

B
42

Statement of Information

from

California Secretary of State

for

11973 San Vicente, LLC

And

11991 San Vicente, LLC



Secretary of State
Statement of Information
(Limited Liability Company)

LLC-12

18-A43284

FILED

In the office of the Secretary of State
of the State of California

FEB 01, 2018

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IMPORTANT — [Read instructions](#) before completing this form.

Filing Fee – \$20.00

Copy Fees – First page \$1.00; each attachment page \$0.50;
Certification Fee - \$5.00 plus copy fees

1. Limited Liability Company Name (Enter the exact name of the LLC. If you registered in California using an alternate name, [see instructions](#).)

11973 SAN VICENTE, LLC

2. 12-Digit Secretary of State File Number
201704010474

3. State, Foreign Country or Place of Organization (only if formed outside of California)
CALIFORNIA

4. Business Addresses

a. Street Address of Principal Office - Do not list a P.O. Box 300 S. Grand Avenue, 37th floor	City (no abbreviations) Los Angeles	State CA	Zip Code 90071
b. Mailing Address of LLC, if different than item 4a 300 S. Grand Avenue, 37th floor	City (no abbreviations) Los Angeles	State CA	Zip Code 90071
c. Street Address of California Office, if Item 4a is not in California - Do not list a P.O. Box 300 S. Grand Avenue, 37th floor	City (no abbreviations) Los Angeles	State CA	Zip Code 90071

If no **managers** have been appointed or elected, provide the name and address of each **member**. At least one name **and** address must be listed. If the manager/member is an individual, complete Items 5a and 5c (leave Item 5b blank). If the manager/member is an entity, complete Items 5b and 5c (leave Item 5a blank). Note: The LLC cannot serve as its own manager or member. If the LLC has additional managers/members, enter the name(s) and addresses on Form LLC-12A ([see instructions](#)).

5. Manager(s) or Member(s)

a. First Name, if an individual - Do not complete Item 5b Charles	Middle Name T.	Last Name Munger	Suffix
b. Entity Name - Do not complete Item 5a			
c. Address 300 S. Grand Avenue, 37th floor	City (no abbreviations) Los Angeles	State CA	Zip Code 90071

6. Service of Process (Must provide either Individual **OR** Corporation.)

INDIVIDUAL – Complete Items 6a and 6b only. Must include agent's full name and California street address.

a. California Agent's First Name (if agent is not a corporation) William	Middle Name Harold	Last Name Borthwick	Suffix
b. Street Address (if agent is not a corporation) - Do not enter a P.O. Box 300 S. Grand Avenue, 37th floor	City (no abbreviations) Los Angeles	State CA	Zip Code 90071

CORPORATION – Complete Item 6c only. Only include the name of the registered agent Corporation.

c. California Registered Corporate Agent's Name (if agent is a corporation) – Do not complete Item 6a or 6b

7. Type of Business

a. Describe the type of business or services of the Limited Liability Company
Real Estate Ownership and Management

8. Chief Executive Officer, if elected or appointed

a. First Name	Middle Name	Last Name	Suffix
b. Address			
City (no abbreviations)		State	Zip Code

9. The Information contained herein, including any attachments, is true and correct.

02/01/2018

Date

William Harold Borthwick

Type or Print Name of Person Completing the Form

Manager

Title

Signature

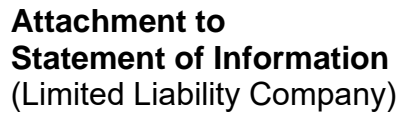
Return Address (Optional) (For communication from the Secretary of State related to this document, or if purchasing a copy of the filed document enter the name of a person or company and the mailing address. This information will become public when filed. [SEE INSTRUCTIONS](#) BEFORE COMPLETING.)

Name: []

Company:

Address:

City/State/Zip: []



18-A43284

11973 SAN VICENTE, LLC

B. 12-Digit Secretary of State File Number

201704010474

C. State or Place of Organization (only if formed outside of California)

CALIFORNIA

[illegible]





Secretary of State
Statement of Information
(Limited Liability Company)

LLC-12

18-A43332

FILED

In the office of the Secretary of State
of the State of California

FEB 01, 2018

IMPORTANT — [Read instructions](#) before completing this form.

Filing Fee – \$20.00

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Certification Fee - \$5.00 plus copy fees

This Space For Office Use Only

1. Limited Liability Company Name (Enter the exact name of the LLC. If you registered in California using an alternate name, [see instructions](#).)

11991 SAN VICENTE, LLC

2. 12-Digit Secretary of State File Number

201706110616

3. State, Foreign Country or Place of Organization (only if formed outside of California)

CALIFORNIA

4. Business Addresses

a. Street Address of Principal Office - Do not list a P.O. Box 300 S. Grand Avenue, 37th floor	City (no abbreviations) Los Angeles	State CA	Zip Code 90071
b. Mailing Address of LLC, if different than item 4a 300 S. Grand Avenue, 37th floor	City (no abbreviations) Los Angeles	State CA	Zip Code 90071
c. Street Address of California Office, if Item 4a is not in California - Do not list a P.O. Box 300 S. Grand Avenue, 37th floor	City (no abbreviations) Los Angeles	State CA	Zip Code 90071

If no **managers** have been appointed or elected, provide the name and address of each **member**. At least one name **and** address must be listed. If the manager/member is an individual, complete Items 5a and 5c (leave Item 5b blank). If the manager/member is an entity, complete Items 5b and 5c (leave Item 5a blank). Note: The LLC cannot serve as its own manager or member. If the LLC has additional managers/members, enter the name(s) and addresses on Form LLC-12A ([see instructions](#)).

5. Manager(s) or Member(s)

a. First Name, if an individual - Do not complete Item 5b Charles	Middle Name T.	Last Name Munger	Suffix
b. Entity Name - Do not complete Item 5a			
c. Address 300 S. Grand Avenue, 37th floor	City (no abbreviations) Los Angeles	State CA	Zip Code 90071

6. Service of Process (Must provide either Individual **OR** Corporation.)

INDIVIDUAL – Complete Items 6a and 6b only. Must include agent's full name and California street address.

a. California Agent's First Name (if agent is not a corporation) William	Middle Name Harold	Last Name Borthwick	Suffix
b. Street Address (if agent is not a corporation) - Do not enter a P.O. Box 300 S. Grand Avenue, 37th floor	City (no abbreviations) Los Angeles	State CA	Zip Code 90071

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Real Estate Ownership and Management

8. Chief Executive Officer, if elected or appointed

a. First Name	Middle Name	Last Name	Suffix
b. Address	City (no abbreviations)	State	Zip Code

9. The Information contained herein, including any attachments, is true and correct.

02/01/2018

Date

William Harold Borthwick

Type or Print Name of Person Completing the Form

Manager

Title

Signature

Return Address (Optional) (For communication from the Secretary of State related to this document, or if purchasing a copy of the filed document enter the name of a person or company and the mailing address. This information will become public when filed. [SEE INSTRUCTIONS](#) BEFORE COMPLETING.)

Name: []

Company:

Address:

City/State/Zip: []



18-A43332

11991 SAN VICENTE, LLC

201706110616

CALIFORNIA

[illegible]



Property Detail Report showing

Property Ownership Information

(See Ref. # in table for association
with APN in Report)

Property Detail Report

For Property Located At :

**11973 SAN VICENTE BLVD, LOS ANGELES, CA
90049-5098**


RealQuest

Owner Information

Bldg Card: 000 of 002

Owner Name: 11973 SAN VICENTE LLC
Mailing Address: PO BOX 55007, LOS ANGELES CA 90055-2007 B900 C/O CHARLES T MUNGER
Vesting Codes: //

Location Information

Legal Description: WESTGATE ACRES SW 83.5 FT OF LOT 51 AND NE 50 FT OF LOT 52
County: LOS ANGELES, CA **APN:** 4404-025-008
Census Tract / Block: 2640.00 / 2 **Alternate APN:**
Township-Range-Sect: Legal Book/Page: 134-96 **Subdivision:** WESTGATE ACRES
Legal Lot: 52 **Map Reference:** 41-C3 /
Legal Block: **Tract#:**
Market Area: C06 **School District:** LOS ANGELES
Neighbor Code: **School District Name:** LOS ANGELES
Munic/Township: LOS ANGELES

Owner Transfer Information

Recording/Sale Date: 04/27/2017 / 04/20/2017 **Deed Type:** QUIT CLAIM DEED
Sale Price: **1st Mtg Document#:**
Document#: 467331

Last Market Sale Information

Recording/Sale Date: 01/11/2007 / 12/26/2006 **1st Mtg Amount/Type:** /
Sale Price: \$14,443,500 **1st Mtg Int. Rate/Type:** /
Sale Type: FULL **1st Mtg Document#:**
Document#: 60468 **2nd Mtg Amount/Type:** /
Deed Type: GRANT DEED **2nd Mtg Int. Rate/Type:** /
Transfer Document#: **Price Per SqFt:** \$602.29
New Construction: **Multi/Split Sale:** MULTIPLE
Title Company: CHICAGO TITLE CO
Lender:
Seller Name: BARRY FAMILY TRUST

Prior Sale Information

Prior Rec/Sale Date: / **Prior Lender:**
Prior Sale Price: **Prior 1st Mtg Amt/Type:** /
Prior Doc Number: **Prior 1st Mtg Rate/Type:** /
Prior Deed Type:

Property Characteristics

Year Built / Eff: 1951 / **Total Rooms/Offices:** **Garage Area:**
Gross Area: 23,981 **Total Restrooms:** 2 **Garage Capacity:**
Building Area: 23,981 **Roof Type:** **Parking Spaces:**
Tot Adj Area: **Roof Material:** **Heat Type:**
Above Grade: **Construction:** **Air Cond:** NONE
of Stories: **Foundation:** **Pool:**
Other Improvements: **Exterior wall:** **Quality:**
Basement Area: **Condition:**

Site Information

Zoning: LAC4 **Acres:** 0.61 **County Use:** STORE & OFFICE (1200)
Lot Area: 26,586 **Lot Width/Depth:** x **State Use:**
Land Use: STORES & OFFICES **Res/Comm Units:** 33 / 32 **Water Type:**
Site Influence: **Sewer Type:**

Tax Information

Total Value: \$5,167,163 **Assessed Year:** 2022 **Property Tax:** \$62,272.85
Land Value: \$4,442,799 **Improved %:** 14% **Tax Area:** 67
Improvement Value: \$724,364 **Tax Year:** 2022 **Tax Exemption:**
Total Taxable Value: \$5,167,163

Property Detail Report

For Property Located At :

**11977 SAN VICENTE BLVD, LOS ANGELES, CA
90049-5003**


RealQuest

Owner Information

Owner Name: 11973 SAN VICENTE LLC
Mailing Address: PO BOX 55007, LOS ANGELES CA 90055-2007 B900 C/O CHARLES T MUNGER
Vesting Codes: //

Location Information

Legal Description: WESTGATE ACRES SW 50 FT OF LOT 52
County: LOS ANGELES, CA **APN:** 4404-025-009
Census Tract / Block: 2640.00 / 2 **Alternate APN:**
Township-Range-Sect: **Subdivision:** WESTGATE ACRES
Legal Book/Page: 134-96 **Map Reference:** 41-B3 /
Legal Lot: 52 **Tract#:**
Legal Block: **School District:** LOS ANGELES
Market Area: C06 **School District Name:** LOS ANGELES
Neighbor Code: **Munic/Township:** LOS ANGELES

Owner Transfer Information

Recording/Sale Date: 04/27/2017 / 04/20/2017 **Deed Type:** QUIT CLAIM DEED
Sale Price: **1st Mtg Document#:**
Document#: 467331

Last Market Sale Information

Recording/Sale Date: 01/11/2007 / 12/26/2006 **1st Mtg Amount/Type:** /
Sale Price: \$14,443,500 **1st Mtg Int. Rate/Type:** /
Sale Type: FULL **1st Mtg Document #:**
Document#: 60468 **2nd Mtg Amount/Type:** /
Deed Type: GRANT DEED **2nd Mtg Int. Rate/Type:** /
Transfer Document#: **Price Per SqFt:**
New Construction: **Multi/Split Sale:** MULTI
Title Company: CHICAGO TITLE CO
Lender:
Seller Name: BARRY FAMILY TRUST

Prior Sale Information

Prior Rec/Sale Date: / **Prior Lender:**
Prior Sale Price: **Prior 1st Mtg Amt/Type:** /
Prior Doc Number: **Prior 1st Mtg Rate/Type:** /
Prior Deed Type:

Property Characteristics

Year Built / Eff: / **Total Rooms/Offices:** **Garage Area:**
Gross Area: **Total Restrooms:** **Garage Capacity:**
Building Area: **Roof Type:** **Parking Spaces:**
Tot Adj Area: **Roof Material:** **Heat Type:**
Above Grade: **Construction:** **Air Cond:**
of Stories: **Foundation:** **Pool:**
Other Improvements: **Exterior wall:** **Quality:**
Basement Area: **Condition:**

Site Information

Zoning: LAC4 **Acres:** 0.23 **County Use:** VACANT RESIDENTIAL (010V)
Lot Area: 9,986 **Lot Width/Depth:** x
Land Use: COMMERCIAL (NEC) **Res/Comm Units:** / **State Use:**
Site Influence: **Water Type:**
Sewer Type:

Tax Information

Total Value: \$2,933,089 **Assessed Year:** 2022 **Property Tax:** \$34,235.18
Land Value: \$2,933,089 **Improved %:** **Tax Area:** 67
Improvement Value: **Tax Year:** 2022 **Tax Exemption:**
Total Taxable Value: \$2,933,089

Property Detail Report

For Property Located At :

11991 SAN VICENTE BLVD, LOS ANGELES, CA
90049-5003



RealQuest

Owner Information

Owner Name:

11991 SAN VICENTE LLC

Mailing Address:

PO BOX 55007, LOS ANGELES CA 90055-2007 B900 C/O CHARLES T MUNGER

Vesting Codes:

//

Location Information

Legal Description:

WESTGATE ACRES LOT 53 AND LOT COM AT MOST E COR OF LOT 54 TH S 76 43' W 0.33 FT TH
 NW TO NW LINE OF SD LOT TH NE THEREON 1.17 FT TO MOST N COR OF SD LOT TH SE 200 FT
 TO BEG PART OF LOT 54

County:

LOS ANGELES, CA

APN:

4404-025-010

Census Tract / Block:

2640.00/2

Alternate APN:

Township-Range-Sect:

134-96

Subdivision:

WESTGATE ACRES

Legal Book/Page:

54

Map Reference:

41-B3/

Legal Lot:

54

Tract#:

Legal Block:

C06

School District:

LOS ANGELES

Market Area:

C06

School District Name:

LOS ANGELES

Neighbor Code:

Munic/Township:

LOS ANGELES

Owner Transfer Information

Recording/Sale Date:

04/27/2017/04/20/2017

Deed Type:

QUIT CLAIM DEED

Sale Price:

1st Mtg Document#:

Document#:

467330

Last Market Sale Information

Recording/Sale Date:

11/17/2006 / 10/20/2006

1st Mtg Amount/Type:

/

Sale Price:

\$10,576,000

1st Mtg Int. Rate/Type:

/

Sale Type:

UNKNOWN

1st Mtg Document#:

/

Document#:

2554850

2nd Mtg Amount/Type:

/

Deed Type:

GRANT DEED

2nd Mtg Int. Rate/Type:

/

Transfer Document #:

Price Per SqFt:

New Construction:

Multi/Split Sale:

Title Company:

CHICAGO TITLE CO

Lender:

Seller Name:

BONNER RICHARD 1998 TRUST

Prior Sale Information

Prior Rec/Sale Date:

/

Prior Lender:

Prior Sale Price:

Prior 1st Mtg Amt/Type:

/

Prior Doc Number:

Prior 1st Mtg Rate/Type:

/

Prior Deed Type:

Property Characteristics

Year Built / Eff:

/

Total Rooms/Offices

Garage Area:

Gross Area:

Total Restrooms:

Garage Capacity:

Building Area:

Roof Type:

Parking Spaces:

Tot Adj Area:

Roof Material:

Heat Type:

Above Grade:

Construction:

Air Cond:

of Stories:

Foundation:

Pool:

Other Improvements:

Exterior wall:

Quality:

Basement Area:

Condition:

Site Information

Zoning:

LAC4

Acres:

0.47

County Use:

VACANT RESIDENTIAL

Lot Area:

20,421

Lot Width/Depth:

x

State Use:

(010V)

Land Use:

COMMERCIAL (NEC) Res/Comm Units:

/

Water Type:

Site Influence:

Sewer Type:

Tax Information

Total Value:

\$6,145,068

Assessed Year:

2022

Property Tax

\$71,666.62

Land Value:

\$6,145,068

Improved %:

Tax Area:

67

Improvement Value:

Tax Year:

2022

Tax Exemption:

Total Taxable Value: \$6,145,068

Property Detail Report

For Property Located At :
,,CA



RealQuest

Owner Information

Owner Name: 11973 SAN VICENTE LLC
Mailing Address: PO BOX 55007, LOS ANGELES CA 90055-2007 B900 C/O CHARLES T MUNGER
Vesting Codes: //

Location Information

Legal Description: WESTGATE ACRES LOT COM N 76 43' E 206.87 FT FROM MOSTS COR OF LOT 56 TH N 76 43' E 50 FT WITH A UNIFORM DEPTH OF 100 FT N 15 15' W PART OF LOT 56
County: LOS ANGELES, CA **APN:** 4404-025-015
Census Tract / Block: 2640.00 / 2 **Alternate APN:**
Township-Range-Sect: **Subdivision:** WESTGATE ACRES
Legal Book/Page: 134-96 **Map Reference:** 41-C3 /
Legal Lot: 56 **Tract#:**
Legal Block: **School District:** LOS ANGELES
Market Area: C06 **School District Name:** LOS ANGELES
Neighbor Code: **Munic/Township:** LOS ANGELES

Owner Transfer Information

Recording/Sale Date: 04/27/2017/04/20/2017 **Deed Type:** QUIT CLAIM DEED
Sale Price: **1st Mtg Document#:**
Document#: 467331

Last Market Sale Information

Recording/Sale Date: 01/11/2007 / 12/26/2006 **1st Mtg Amount/Type:** /
Sale Price: \$14,443,500 **1st Mtg Int. Rate/Type:** /
Sale Type: FULL **1st Mtg Document#:**
Document#: 60468 **2nd Mtg Amount/Type:** /
Deed Type: GRANT DEED **2nd Mtg Int. Rate/Type:** /
Transfer Document #: **Price Per SqFt:** \$2,888.70
New Construction: **Multi/Split Sale:** MULTI
Title Company: CHICAGO TITLE CO
Lender:
Seller Name: BARRY FAMILY TRUST

Prior Sale Information

Prior Rec/Sale Date: / **Prior Lender:**
Prior Sale Price: **Prior 1st Mtg Amt/Type:** /
Prior Doc Number: **Prior 1st Mtg Rate/Type:** /
Prior Deed Type:

Property Characteristics

Year Built / Eff: 1948 / 1980 **Total Rooms/Offices:** **Garage Area:**
Gross Area: 5,000 **Total Restrooms:** **Garage Capacity:**
Building Area: 5,000 **Roof Type:** **Parking Spaces:**
Tot Adj Area: **Roof Material:** **Heat Type:**
Above Grade: **Construction:** **Air Cond:**
of Stories: **Foundation:** **Pool:**
Other Improvements: **Exterior wall:** **Quality:**
Basement Area: **Condition:**

Site Information

Zoning: LAP **Acres:** 0.11 **County Use:** PARKING LOT (2700)
Lot Area: 5,003 **Lot Width/Depth:** 50 x 100 **State Use:**
Land Use: PARKING LOT **Res/Comm Units:** / **Water Type:**
Site Influence: **Sewer Type:**

Tax Information

Total Value: \$1,340,075 **Assessed Year:** 2022 **Property Tax:** \$15,845.11
Land Value: \$1,334,043 **Improved%:** **Tax Area:** 67
Improvement Value: \$6,032 **Tax Year:** 2022 **Tax Exemption:**
Total Taxable Value: \$1,340,075

Property Detail Report

For Property Located At :
,, CA



RealQuest

Owner Information

Owner Name: 11973 SAN VICENTE LLC
Mailing Address: PO BOX 55007, LOS ANGELES CA 90055-2007 B900 C/O CHARLES T MUNGER
Vesting Codes: //

Location Information

Legal Description: WESTGATE ACRES LOT COM N 76 43' E 256.87 FT FROM MOST S COR OF LOT 56 TH N 76 43' E 133.50 FT WITH A UNIFORM DEPTH OF 100 FTTH N 1515'WPARTOF LOT56
County: LOS ANGELES, CA **APN:** 4404-025-016
Census Tract / Block: 264000 / 2 **Alternate APN:**
Township-Range-Sect: **Subdivision:** WESTGATE ACRES
Legal Book/Page: 134-96 **Map Reference:** 41-C3/
Legal Lot: 56 **Tract#:**
Legal Block: **School District:** LOS ANGELES
Market Area: C06 **School District Name:** LOS ANGELES
Neighbor Code: **Munic/Township:** LOS ANGELES

Owner Transfer Information

Recording/Sale Date: 04/27/2017 / 04/20/2017 **Deed Type:** QUIT CLAIM DEED
Sale Price: **1st Mtg Document#:**
Document#: 467331

Last Market Sale Information

Recording/Sale Date: 01/11/2007 / 12/26/2006 **1st Mtg Amount/Type:** /
Sale Price: \$14,443,500 **1st Mtg Int. Rate/Type:** /
Sale Type: FULL **1st Mtg Document#:** /
Document#: 60468 **2nd Mtg Amount/Type:** /
Deed Type: GRANT DEED **2nd Mtg Int. Rate/Type:** /
Transfer Document#: **Price Per SqFt:** \$1,803.18
New Construction: **Multi/Split Sale:** MULTI
Title Company: CHICAGO TITLE CO
Lender:
Seller Name: BARRY FAMILY TRUST

Prior Sale Information

Prior Rec/Sale Date: / **Prior Lender:**
Prior Sale Price: **Prior 1st Mtg Amt/Type:** /
Prior Doc Number: **Prior 1st Mtg Rate/Type:** /
Prior Deed Type:

Property Characteristics

YearBuilt/Eff: 1951/1951	Total Rooms/Offices	Garage Area:
Gross Area: 8,010	Total Restrooms:	Garage Capacity:
Building Area: 8,010	Roof Type:	Parking Spaces:
Tot Adj Area:	Roof Material:	Heat Type:
Above Grade:	Construction:	Air Cond:
# of Stories:	Foundation:	Pool:
Other Improvements:	Exterior wall:	Quality:
	Basement Area:	Condition:

Site Information

Zoning: LAP	Acres: 0.30	County Use: PARKING LOT (2700)
Lot Area: 13,234	Lot Width/Depth: x	State Use:
Land Use: PARKING LOT	Res/Comm Units: /	Water Type:
Site Influence:		Sewer Type:

Tax Information

Total Value: \$2,439,307	Assessed Year: 2022	Property Tax: \$29,007.03
Land Value: \$2,438,707	Improved%:	Tax Area: 67
Improvement Value: \$600	Tax Year: 2022	Tax Exemption:
Total Taxable Value: \$2,439,307		

Property Detail Report

For Property Located At :

644 S SALT AIR AVE, LOS ANGELES, CA 90049-4138


Real Quest

Owner Information

Owner Name: 11991 SAN VICENTE LLC
Mailing Address: PO BOX 55007, LOS ANGELES CA 90055-2007 B900 C/O CHARLES T MUNGER
Vesting Codes: //

Location Information

Legal Description: WESTGATE ACRES LOT COM AT SW COR OF LOT 56 TH N 15 15' W TO A LINE PARALLEL WITH AND DIST SE AT R/A 50 FT FROM SE LINE OF TRACT NO 13063 TH NE ON SD PARALLEL LINE TO NW PROLONGATION OF NE BEG PART OF LOT 56

County:	LOS ANGELES, CA	APN:	4404-025-027
Census Tract / Block:	2640.00/2	Alternate APN:	
Township-Range-Sect:		Subdivision:	13063
Legal Book/Page:	134-96	Map Reference:	41-B3 /
Legal Lot:	56	Tract#:	13063
Legal Block:		School District:	LOS ANGELES
Market Area:	C06	School District Name:	LOS ANGELES
Neighbor Code:		Munic/Township:	LOS ANGELES

Owner Transfer Information

Recording/Sale Date:	04/27/2017 / 04/20/2017	Deed Type:	QUIT CLAIM DEED
Sale Price:		1st Mtg Document#:	
Document#:	467330		

Last Market Sale Information

Recording/Sale Date:	06/09/1989/ 06/1989	1st Mtg Amount/Type:	/
Sale Price:	\$900,000	1st Mtg Int. Rate/Type:	/
Sale Type:	FULL	1st Mtg Document#:	
Document#:	935042	2nd Mtg Amount/Type:	/
Deed Type:	GRANT DEED	2nd Mtg Int. Rate/Type:	/
Transfer Document#:		Price Per SqFt:	
New Construction:		Multi/Split Sale:	
Title Company:			
Lender:			
Seller Name:	ZIFF RAYMOND		

Prior Sale Information

Prior Rec/Sale Date:	05/1973 /	Prior Lender:	
Prior Sale Price:	\$77,500	Prior 1st Mtg Amt/Type:	/
Prior Doc Number:		Prior 1st Mtg Rate/Type:	/
Prior Deed Type:	DEED(REG)		

Property Characteristics

Gross Area:		Parking Type:		Construction:	
Living Area:		Garage Area:		Heat Type:	
Tot Adj Area:		Garage Capacity:		Exterior wall:	
Above Grade:		Parking Spaces:		Porch Type:	
Total Rooms:		Basement Area:		Patio Type:	
Bedrooms:		Finish Bsmnt Area:		Pool:	POOL
Bath(F/H):	/	Basement Type:		Air Cond:	
Year Built / Eff:	/	Roof Type:		Style:	
Fireplace:	/	Foundation:		Quality:	
# of Stories:		Roof Material:		Condition:	
Other Improvements:					

Site Information

Zoning:	LARS	Acres:	0.24	County Use:	SINGLE FAMILY RESID (0101)
Lot Area:	10,387	Lot Width/Depth:	50 x 207	State Use:	
Land Use:	SFR	Res/Comm Units:	/	Water Type:	
Site Influence:				Sewer Type:	TYPE UNKNOWN

Tax Information

Total Value:	\$1,826,201	Assessed Year:	2022	Property Tax:	\$21,591.68
Land Value:	\$1,826,201	Improved %:		Tax Area:	67
Improvement Value:		Tax Year:	2022	Tax Exemption:	
Total Taxable Value:	\$1,826,201				

Property Detail Report

For Property Located At :

642 S SALT AIR AVE, LOS ANGELES, CA 90049-4138



RealQuest

Owner Information

Owner Name: 11991 SAN VICENTE LLC
Mailing Address: PO BOX 55007, LOS ANGELES CA 90055-2007 B900 C/O CHARLES T MUNGER
Vesting Codes: //

Location Information

Legal Description: WESTGATE ACRES LOT COM AT MOSTS COR OF TRACT NO 13063 TH S 15 15' E TO A LINE PARALLEL WITH AND DIST SE AT R/A 50 FT FROM SE LINE OF SD TR TH NE ON SD PARALLEL LINE TO NW PROLONGATION OF NE LOT 56
County: LOS ANGELES, CA **APN:** 4404-025-028
Census Tract / Block: 2640.00 / 2 **Alternate APN:**
Township-Range-Sect: **Subdivision:** 13063
Legal Book/Page: 134-96 **Map Reference:** 41-B3/
Legal Lot: 56 **Tract#:** 13063
Legal Block: **School District:** LOS ANGELES
Market Area: C06 **School District Name:** LOS ANGELES
Neighbor Code: **Munic/Township:** LOS ANGELES

Owner Transfer Information

Recording/Sale Date: 04/27/2017 / 04/20/2017 **Deed Type:** QUIT CLAIM DEED
Sale Price: **1st Mtg Document#:**
Document#: 467330

Last Market Sale Information

Recording/Sale Date: 10/24/1986 / 10/1986 **1st Mtg Amount/Type:** /
Sale Price: \$500,000 **1st Mtg Int. Rate/Type:** /
Sale Type: FULL **1st Mtg Document#:** /
Document#: 1442719 **2nd Mtg Amount/Type:** /
Deed Type: GRANT DEED **2nd Mtg Int. Rate/Type:** /
Transfer Document#: **Price Per SqFt:**
New Construction: **Multi/Split Sale:**
Title Company:
Lender:
Seller Name: ZIFF RAYMOND

Prior Sale Information

Prior Rec/Sale Date: / **Prior Lender:**
Prior Sale Price: **Prior 1st Mtg Amt/Type:** /
Prior Doc Number: **Prior 1st Mtg Rate/Type:** /
Prior Deed Type:

Property Characteristics

Gross Area:	Parking Type:	Construction:
Living Area:	Garage Area:	Heat Type:
Tot Adj Area:	Garage Capacity:	Exterior wall:
Above Grade:	Parking Spaces:	Porch Type:
Total Rooms:	Basement Area:	Patio Type:
Bedrooms:	Finish Bsmnt Area:	Pool: POOL
Bath(F/H): /	Basement Type:	Air Cond:
Year Built / Eff: /	Roof Type:	Style:
Fireplace: /	Foundation:	Quality:
# of Stories:	Roof Material:	Condition:
Other Improvements:		

Site Information

Zoning: LARS	Acres: 0.24	County Use: SINGLE FAMILY RESID (0101)
Lot Area: 10,486	Lot Width/Depth: 50 x 160	State Use:
Land Use: SFR	Res/Comm Units: /	Water Type:
Site Influence: CORNER		Sewer Type: TYPE UNKNOWN

Tax Information

Total Value: \$1,453,059	Assessed Year: 2022	Property Tax: \$17,266.75
Land Value: \$1,453,059	Improved %:	Tax Area: 67
Improvement Value:	Tax Year: 2022	Tax Exemption:
Total Taxable Value: \$1,453,059		

Property Detail Report

For Property Located At :

11901 SALTAIR TER, LOS ANGELES, CA 90049



RealQuest

Owner Information

Owner Name: 11901 SAN VICENTE LLC
Mailing Address: PO BOX 55007, LOS ANGELES CA 90055-2007 B900 C/O CHARLES T MUNGER
Vesting Codes: / /

Location Information

Legal Description: TRACT# 13063 LOT 8
County: LOS ANGELES, CA **APN:** 4404-026-008
Census Tract / Block: 2640.00 / 2 **Alternate APN:**
Township-Range-Sect: **Subdivision:** 13063
Legal Book/Page: 287-34 **Map Reference:** 41-B3 /
Legal Lot: 8 **Tract#:** 13063
Legal Block: **School District:** LOS ANGELES
Market Area: C06 **School District Name:** LOS ANGELES
Neighbor Code: **Munic/Township:** LOS ANGELES

Owner Transfer Information

Recording/Sale Date: 04/27/2017 / 04/20/2017 **Deed Type:** QUIT CLAIM DEED
Sale Price: **1st Mtg Document#:**
Document#: 467330

Last Market Sale Information

Recording/Sale Date: 08/08/2006 / 07/27/2006 **1st Mtg Amount/Type:** /
Sale Price: **1st Mtg Int. Rate/Type:** /
Sale Type: N **1st Mtg Document#:**
Document#: 1753461 **2nd Mtg Amount/Type:** /
Deed Type: GRANT DEED **2nd Mtg Int. Rate/Type:** /
Transfer Document#: **Price Per SqFt:**
New Construction: **Multi/Split Sale:**

Title Company: EQUITY TITLE CO.
Lender:
Seller Name: SIMMONS E & D TRUST

Prior Sale Information

Prior Rec/Sale Date: 07/06/1993 / **Prior Lender:**
Prior Sale Price: **Prior 1st Mtg Amt/Type:** /
Prior Doc Number: 1282728 **Prior 1st Mtg Rate/Type:** /
Prior Deed Type: DEED (REG)

Property Characteristics

Gross Area:	Parking Type:	Construction:
Living Area:	Garage Area:	Heat Type:
Tot Adj Area:	Garage Capacity:	Exterior wall:
Above Grade:	Parking Spaces:	Porch Type:
Total Rooms:	Basement Area:	Patio Type:
Bedrooms:	Finish Bsmnt Area:	Pool:
Bath(F/H): /	Basement Type:	Air Cond:
Year Built / Eff: /	Roof Type:	Style:
Fireplace: /	Foundation:	Quality:
# of Stories:	Roof Material:	Condition:
Other Improvements:		

Site Information

Zoning: LARS	Acres: 0.28	County Use: SINGLE FAMILY RESID (0100)
Lot Area: 12,317	Lot Width/Depth: x	State Use:
Land Use: SFR	Res/Comm Units: /	Water Type:
Site Influence: CUL-DE-SAC		Sewer Type: TYPE UNKNOWN

Tax Information

Total Value: \$2,855,316	Assessed Year: 2022	Property Tax: \$33,400.93
Land Value: \$2,855,316	Improved %:	Tax Area: 67
Improvement Value:	Tax Year: 2022	Tax Exemption:
Total Taxable Value: \$2,855,316		

**ATTACHMENT
B**

Council File: 07-2309



Title

THE BARRY BUILDING / HISTORIC MONUMENT

Subject

Communication from the Cultural Heritage Commission, dated July 17, 2007, relative to the inclusion of The Barry Building, located at 11973 West San Vicente Boulevard, in the list of Historic-Cultural Monuments. CHC 2007-1585-HCM.

Date Received / Introduced

07/18/2007

Last Changed Date

11/06/2007

Council District

11

Initiated by

Cultural Heritage Commission

File History

7-18-07 - For ref
 7-18-07 - Ref to Planning and Land Use Management Committee
 7-18-07 - File to Planning and Land Use Management Committee Clerk
 9-14-07 - Set for Planning and Land Use Management Committee on September 18, 2007
 9-18-07 - Planning and Land Use Management Committee Disposition - Approved
 10-2-07 - Council Action - Planning and Land Use Management Committee Report ADOPTED - Findings ADOPTED
 11-2-07 - File to Planning and Land Use Management Committee Clerk OK
 11-6-07 - File in files

Online Documents (Doc)

Title	Doc Date
Report from Cultural Heritage Commission	07/17/2007

Council Vote Information

Meeting Date: 10/02/2007

Meeting Type: Regular

Vote Action: Adopted

Vote Given: (14 - 0 - 1)

Member Name	CD	Vote
RICHARD ALARCON	7	YES
TONY CARDENAS	6	YES
ERIC GARCETTI	13	YES
WENDY GREUEL	2	YES
JANICE HAHN	15	YES
JOSE HUIZAR	14	ABSENT
TOM LABONGE	4	YES
BERNARD C PARKS	8	YES
JAN PERRY	9	YES
ED REYES	1	YES
BILL ROSENDAHL	11	YES
GREIG SMITH	12	YES
JACK WEISS	5	YES
HERB WESSON	10	YES
DENNIS ZINE	3	YES

ATTACHMENT C

Outside Image:

The Barry Building and adjacent business "Trellis Florist" (looking eastbound along San Vicente Boulevard)

Source: Google Streetview, July 2009



East side of Courtyard looking toward San Vicente Blvd

Source: Patch (2012)



The view from the back balcony towards the street side, showing the cantilevered 2nd floor

Source: Laura Clayton Baker (2016)



The view from the 2nd floor balcony across the courtyard

Source: Laura Clayton Baker (2016)



Courtyard Café

Source: Laura Clayton Baker (2016)



Courtyard

Source: Ty Miller (2016)



ATTACHMENT D

December 21, 2020

Sent Electronically

Mr. Bradley Furuya
City of Los Angeles, Department of City Planning
221 N. Figueroa Street, Room 1350
Los Angeles, CA 90012
Email: Bradley.furuya@lacity.org

**RE: Notice of Preparation for the 11973 San Vicente Boulevard
Project Draft Environmental Impact Report**

Dear Mr. Furuya:

On behalf of the Los Angeles Conservancy, I am writing to comment on the Notice of Preparation (NOP) for the 11973 San Vicente Boulevard Project. The subject property, also known as the Barry Building, is Historic-Cultural Monument (HCM) #887.

The Los Angeles Conservancy is extremely concerned by the proposed demolition of a designated HCM for no other reason than to clear the lot without an identified replacement project. Such action creates a dangerous precedent and incentivizes future property owners from pursuing similar outcomes, as well as encouraging demolition by neglect. Should the City of Los Angeles approve the proposed demolition of this HCM without a replacement project, it will severely erode protections upheld by the City's historic preservation program and result in a potential circumvention of the California Environmental Quality Act (CEQA).

**I. 11973 San Vicente Boulevard, known as the Barry
Building, is a designated Historic-Cultural Monument.**

Completed in 1951 and designed by local architect Milton Caughey for owner David Barry. The Barry Building is an excellent example of Mid-Century Modern commercial architecture. The building incorporates elements of the International Style, that include an elevated second story, clean lines, a horizontal orientation, and an interior courtyard with cantilevered stairways.



In 2007, the City of Los Angeles designated the Barry Building as Historic-Cultural Monument #887 because it is an excellent and intact example of Mid-Century Modern Architecture.

II. Demolition by neglect is being used as a tactic to circumvent historic preservation regulations and CEQA.

For over ten years the property owners, that includes Charles T. Munger, has sought to demolish the historic Barry Building. Redevelopment plans have varied from condominiums to retail complexes, and each of these iterations have included the complete demolition of HCM #887.

In 2012, the City released its Final EIR for the Green Hollow Square Project, which called for the demolition of the Barry Building as well as altering the Coral Tree Median (HCM #148). Countless neighborhood advocates voiced their opposition to the project which prompted then Councilmember Bill Rosendahl to voice his opposition. Throughout the EIR process a clear preservation alternative emerged that would have allowed for the retention and reuse of the Barry Building alongside proposed new development. The owner rejected this despite its meeting a majority of identified project objectives. Unwilling to compromise or consider alternatives, in 2013 the owners requested to withdraw their zoning entitlements request, thus ending the proposed Green Hollow Square Project.

In 2016, the property owners used seismic concerns as a means to evict its commercial tenants. Since their eviction the property has remained boarded up and neglected. Overtime, character defining features that included metal window shutters have been removed or disappeared from the property. This action was not approved or reviewed by the City's Office of Historic Resources staff.

Such actions are undoubtedly demolition by neglect which occurs when property owners intentionally allow a historic property to suffer severe deterioration, potentially beyond the point of repair. Property owners who take this approach often use it as a means to circumvent historic preservation regulations and to later justify total demolition of historic resources. Should the City reward this behavior by granting demolition, it is setting a dangerous precedent for future proposed demolitions of Los Angeles's historic resources. Such actions are occurring with greater frequency so we urge the City to stand firm in this case and pursue actionable demolition be neglect deterrents.

III. Alternatives to the proposed demolition of the Barry Building must be considered.

A key policy under the California Environmental Quality Act (CEQA) is the lead agency's duty to "take all action necessary to provide the people of this state with historic environmental qualities and preserve for future generations examples of major periods of California history."¹ To this end, CEQA "requires public agencies to deny approval of a project with significant adverse

¹Public Resource Code, Sec. 21001 (b), (c).



effects when feasible alternatives or feasible mitigation measures can substantially lessen such effects.”² The fact that an environmentally superior alternative may be more costly or fails to meet all project objectives does not necessarily render it infeasible under CEQA.³ Reasonable alternatives must be considered “even if they substantially impede the project or are more costly.”⁴ Likewise, findings of alternative feasibility or infeasibility must be supported by substantial evidence.⁵

Demolition of the Barry Building without a replacement project is a blatant violation of CEQA. The proposed project is completely unnecessary and an effort to circumvent historic preservation regulation for its future development. It is the City’s duty as the lead agency to deny the proposed project as stated by CEQA law.

As with the proposed Green Hollow Square Project, a preservation alternative remains feasible for the applicant. Such an alternative works in tandem with new development. Historic Preservation and new development are not mutually exclusive. Successful preservation for the Barry Building is a “win-win” solution whereby the historic building can be rehabilitated and sensitive new development may occur on the vacant portion of the parcel.

IV. Conclusion

The Conservancy strongly opposes the demolition of the historic Barry Building HCM #887. The proposed demolition with no replacement project is in strict violation of CEQA law and therefore must be denied by the lead agency. For nearly a decade the Conservancy has advocated for “win-win” solutions for the Barry Building and we remain committed to this outcome.

The Conservancy urges the City of Los Angeles to reconsider its current environmental review process for this proposal as a replacement project as necessary, in addition to the full exploration of adaptive reuse alternatives. The proposed demolition of the Barry Building is unnecessary and will create a harmful precedent. Such a precedent undermines all efforts of the Office of Historic Resources and the City’s historic preservation program

The Conservancy welcomes an opportunity to work with the City and the applicant to determine how potential preservation alternatives and a “win-win” outcome can be achieved.

About the Los Angeles Conservancy:

The Los Angeles Conservancy is the largest local historic preservation organization in the United States, with nearly 5,000 members throughout the Los Angeles area. Established in 1978, the

² *Sierra Club v. Gilroy City Council* (1990) 222 Cal.App.3d 30, 41; also see Public Resources Code §§ 21002, 21002.1.

³ Guideline § 15126.6(a).

⁴ *San Bernardino Valley Audubon Soc’y v. County of San Bernardino* (1984), 155 Cal.App.3d 738, 750; Guideline § 15126(d)(1).

⁵ Public Resources Code § 21081.5.



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 contact me at (213) 430-4203 or afine@laconservancy.org should you have any questions or concerns.

Sincerely,

A handwritten signature in dark blue ink that reads "Adrian Scott Fine". The script is fluid and cursive, with the first letters of each name being capitalized and prominent.

Adrian Scott Fine
Director of Advocacy



ATTACHMENT E

NOTICE OF DEMOLITION

Project Address: 11973 W SAN VICENTE BLVD

Application Number: 19019-10000-04750

Scope of Work: DEMOLISH EXISTING 2-STORY OFFICE BLDG

This is notification that an application has been filed with the Department of Building & Safety for the Demolition of:

For information regarding the status of this application: Within L.A. County call 311 or (866)4LACTTY (452-2489) Outside of L.A. County call (213) 473-3231 or Visit our website at www.ladbs.org click on "Permit and Inspection Report" NOTE: PROVIDED THAT THE SUBMITTED PLANS COMPLY WITH ALL LOS ANGELES MUNICIPAL CODES AND OTHER APPLICABLE LAWS, PUBLIC COMMENT WILL HAVE NO IMPACT ON THIS PROJECT. SHOULD YOU NEED MORE INFORMATION REGARDING THE PROJECT, PLEASE CALL THE OWNER/AGENT AS SHOWN ON THE APPLICATION AT: (213) 576-1000

ANGELA WARREN

ATTACHMENT F

DEPARTMENT OF
CITY PLANNING
200 N. SPRING STREET, ROOM 525
LOS ANGELES, CA 90012-4801
AND
6262 VAN NUYS BLVD., SUITE 351
VAN NUYS, CA 91401
—
CITY PLANNING COMMISSION

WILLIAM ROSCHEN
PRESIDENT
REGINA M. FREER
VICE-PRESIDENT
SEAN O. BURTON
DIEGO CARDOSO
GEORGE HOVAGUIMIAN
JUSTIN KIM
ROBERT LESSIN
BARBARA ROMERO
MICHAEL K. WOO
—
JAMES WILLIAMS
COMMISSION EXECUTIVE ASSISTANT II
(213) 978-1300

CITY OF LOS ANGELES CALIFORNIA



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VACANT
DEPUTY DIRECTOR
(213) 978-1274

FAX: (213) 978-1275

INFORMATION
www.planning.lacity.org

April 19, 2011

Hadar Plafkin, Environmental Review Coordinator
Department of City Planning
200 N. Spring Street, Room 750
Los Angeles, CA 90012

Dear Mr. Plafkin,

On behalf of the Cultural Heritage Commission, thank you for the opportunity to formally comment on the Draft Environmental Impact Report (DEIR) for the Green Hollow Square Project. As you know, the Barry Building located at 11973 W. San Vicente Boulevard is designated as Historic-Cultural Monument (HCM) #887 under the City of Los Angeles' Cultural Heritage Ordinance and would be demolished under the proposed project.

The Cultural Heritage Commission's primary responsibility in its capacity as a Mayor-appointed decision-making body is to oversee the preservation and safeguarding of the City of Los Angeles' nearly 1000 Historic-Cultural Monuments. Since its establishment in 1962, demolition of an HCM is contrary to the goals and principles of the Cultural Heritage Commission and the Cultural Heritage Ordinance. This Commission exists for the promotion and protection of Historic-Cultural Monuments and takes very serious the prospect of an HCM being eliminated forever.

Another impacted Historic-Cultural Monument by the Green Hollow Square Project is the Coral Trees on San Vicente Boulevard (HCM #148). The Cultural Heritage Commission is concerned about alterations to this historic resource and the cumulative impacts to the landscaped median.

After thoughtfully reviewing the DEIR and listening to testimony at a public hearing held on April 7th, 2011, the Cultural Heritage Commission provides the following comments:

1) The Cultural Heritage Commission supports a preservation alternative that retains and integrates the Barry Building into the proposed project and preserves the Historic-Cultural Monument.

The Cultural Heritage Commission believes that the Barry Building can be integrated into a new development while also meeting and exceeding the project goals of the proposed project. Other projects throughout the City of Los Angeles have been successful in incorporating Historic-Cultural Monuments through the guidance and support of the Cultural Heritage Commission and its Office of Historic Resources. We do not believe that our Historic-Cultural Monuments should be frozen in time but strongly support sensitive reuse of historic resources for new projects.

2) The Cultural Heritage Commission finds that Alternative 4 (“Preservation Alternative”) in the DEIR is inadequate.

Alternative 4 as currently presented in the DEIR is inadequate and a disingenuous attempt to provide a preservation alternative for the proposed project. This alternative does not appear to take seriously into consideration the existing historic resource and lacks detailed analysis compared to other alternatives in the DEIR. Retention of the Barry Building must be a primary responsibility of the proposed project’s applicant and must not be treated as a secondary issue or an afterthought. Renderings attempting to incorporate the Barry Building in the DEIR appear cartoonish and unprofessional and give the impression of entombing the historic building. This preservation alternative must provide renderings and analysis of the proposed development that both compliment and integrate the Barry Building

While the DEIR states that Alternative 4 may not meet Objective 1 and that “retention of the Barry Building may affect the architectural integration of the overall project,” the Cultural Heritage Commission’s response is to simply have the proposed development’s design better respond to the Barry Building’s mid-twentieth century design. These design modifications can be minimal and do not have to fundamentally alter the site planning and square-footage of the proposed project.

Even with these concerns, Alternative 4 still proves to be the environmentally superior alternative as explicitly stated in the DEIR. Having the same number of parking spaces as the proposed project with only a 5% reduction in square footage, a preservation alternative should also be able to meet the economic goals under Objective 4. With only minor design changes, Alternative 4 can also easily meet all project objectives without being rendered infeasible.

3) The proposed demolition of the Barry Building sets a dangerous precedent for other designated Historic-Cultural Monuments in the City of Los Angeles.

The loss of a Historic-Cultural Monument is always a great tragedy for the City of Los Angeles. A concerted effort to purposefully demolish a Historic-Cultural Monument for a replacement project is unacceptable. Pursuing the demolition of the Barry Building imperils the nearly 1000 Historic-Cultural Monuments in the City of Los Angeles and sets a dangerous precedent.

4) The Barry Building is a rare example of a commercial mid-20th century modern Historic-Cultural Monument.

When designated as a Historic-Cultural Monument, the Barry Building met Cultural Heritage Ordinance criteria for “embodying the distinguishing characteristics of an architectural type specimen, inherently valuable for a study of a period style or method of construction” as an example of International Style commercial architecture. Apart from the potential loss of the designated historic resource, the Barry Building is one of the few very rare examples of commercial mid-twentieth century modern design in the register of Historic-Cultural Monuments. In fact, a preliminary review suggests that the Barry Building is only one of three modernist commercial buildings out of nearly 1000 designated Historic-Cultural Monuments: the only other two are the Neutra Office Building (HCM #676; constructed 1951) and the Jones and Emmons Building (HCM #696; constructed 1954).

With the departure of Dutton’s Brentwood Bookstore and the introduction of new tenants to the storefront spaces, greater transparency and views have been restored to the Barry Building that bring it closer to its c. 1951 appearance. Along with the continued maintenance by the property owner, current photographs of the Barry Building reveal it to be in excellent condition.

5) The Coral Trees on the San Vicente Boulevard median (HCM #148) must not be altered or modified.

The Coral Trees on the median strip of San Vicente Boulevard between 26th Street and Bringham Avenue were designated as Historic-Cultural Monument #148 in 1976. The coral trees are part of the elegance of the San Vicente Blvd commercial corridor and are a major character-defining feature of the area. Removing and altering the coral trees and the median under the DEIR's different proposals is unacceptable. The cumulative impact of past and potential future alterations to this landscaped median in other sections is also a concern for the Cultural Heritage Commission.

The Cultural Heritage Commission urges the City Planning Department to address the comments and concerns raised in this letter. We urge the development of a viable preservation alternative that ensures the protection of the Barry Building as a Historic-Cultural Monument. The future of other Historic-Cultural Monuments in the City of Los Angeles will be directly impacted by the results of the Environmental Impact Report for this project. Please continue to integrate the Cultural Heritage Commission on any future proposed projects that impact Historic-Cultural Monuments.

Thank you for this opportunity.

Sincerely,

A handwritten signature in black ink, appearing to read 'Richard Barron', with a large, stylized circular flourish at the end.

RICHARD BARRON, President
Cultural Heritage Commission

642 and 644 S Saltair Ave

Before demolition, July 2009

(Source: Google Streetview, July 2009)



642 and 644 S Saltair Ave
After demolition, May 2015
(Source: Google Streetview, May 2015)

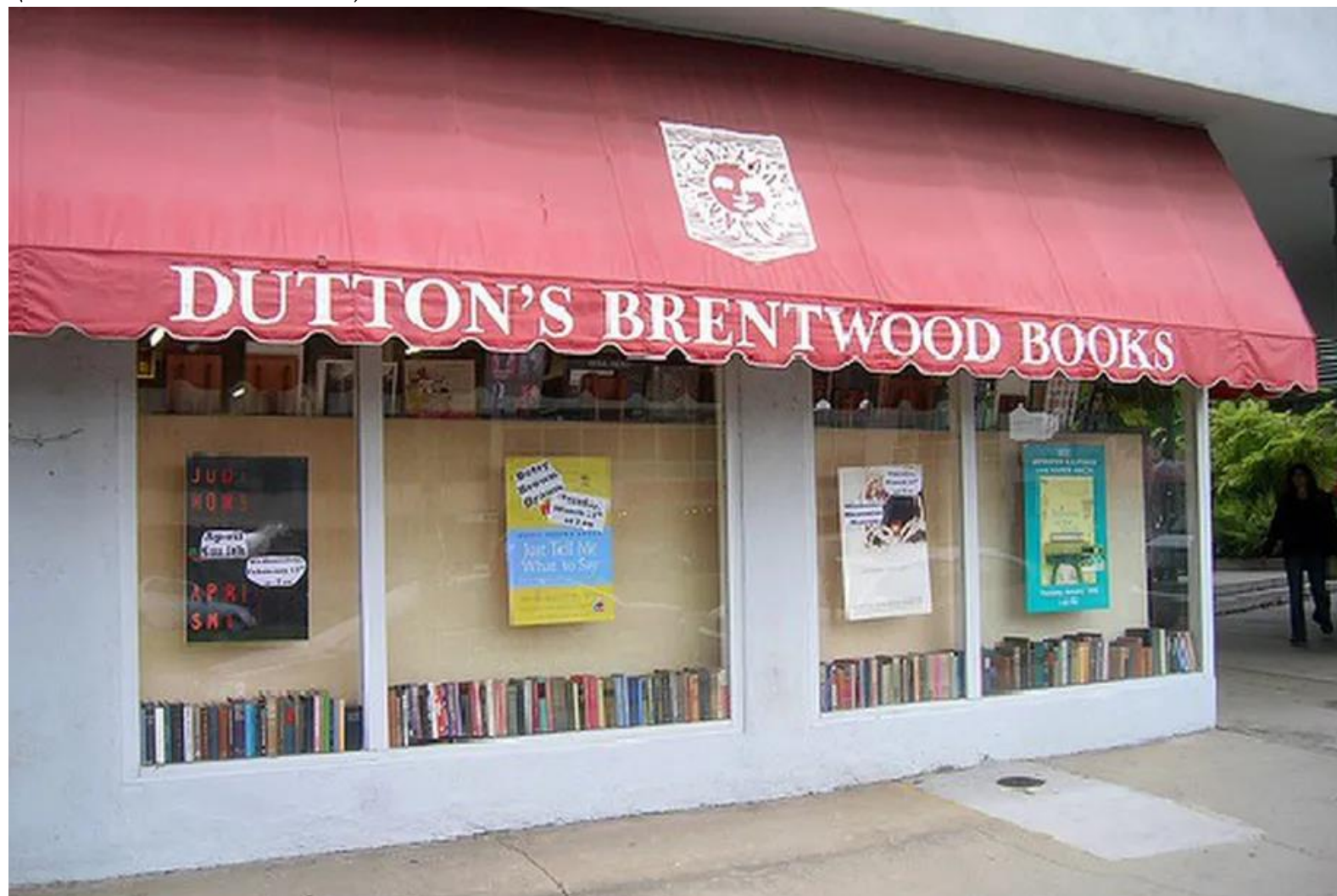


1965 - Brentwood Books
(Source: Movie "Sylvia")



Dutton's Brentwood Books, March 2008

(Source: Racked LA)



Former Del Mano Gallery and Trellis Florist at 11977 San Vicente Blvd.

(Source: Google Streetview, July 2009)



11977 San Vicente Blvd. after demolition of Del Mano Gallery and Trellis Florist
(Source: Google Streetview, October 2014)



Bonner School at 11991 San Vicente Blvd.

(Source: Google Streetview, July 2009)



11991 San Vicente Blvd. after demolition of the Bonner School
(Source: Google Streetview, October 2014)



DEPARTMENT OF
CITY PLANNING
OFFICE OF HISTORIC RESOURCES
200 N. SPRING STREET, ROOM 620
LOS ANGELES, CA 90012-4801
(213) 978-1200

—
CULTURAL HERITAGE COMMISSION

RICHARD BARRON
PRESIDENT
ROELLA H. LOUIE
VICE PRESIDENT

TARA J. HAMACHER
GAIL M. KENNARD
OZ SCOTT

—
FELY C. PINGOL
COMMISSION EXECUTIVE ASSISTANT
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FAX: (213) 978-1275

INFORMATION
www.planning.lacity.org

June 7, 2012

City Planning Commission
200 North Spring Street, Rm 272
Los Angeles, CA 90012

Commissioners:

On behalf of the Cultural Heritage Commission, thank you for the opportunity to formally comment on the Final Environmental Impact Report (FEIR) for the Green Hollow Square Project. The Barry Building located at 11973 W. San Vicente Boulevard is designated as Historic-Cultural Monument (HCM) #887 under the City of Los Angeles' Cultural Heritage Ordinance and would be demolished under the proposed project. The project would also potentially impact the Coral Trees on the median strip of San Vicente Boulevard (Historic-Cultural Monument #148).

The Cultural Heritage Commission's primary responsibility in its capacity as a Mayor-appointed decision-making body is to oversee the preservation and safeguarding of the City of Los Angeles' over 1,000 Historic-Cultural Monuments. Since its establishment in 1962, demolition of an HCM has been contrary to the goals and principles of the Cultural Heritage Commission and the Cultural Heritage Ordinance. This Commission exists for the promotion and protection of Historic-Cultural Monuments and takes very seriously the prospect of an HCM being eliminated forever.

When designated as a Historic-Cultural Monument, the Barry Building met Cultural Heritage Ordinance criteria for "embodying the distinguishing characteristics of an architectural type specimen, inherently valuable for a study of a period style or method of construction" as an example of International Style commercial architecture. Apart from the potential loss of the designated historic resource, the Barry Building is one of the few very rare examples of commercial mid-twentieth century modern design in the register of Historic-Cultural Monuments. In fact, a preliminary review suggests that the Barry Building is only one of three modernist commercial buildings out of over 1,000 designated Historic-Cultural Monuments: the only other two are the Neutra Office Building (HCM #676; constructed 1951) and the Jones and Emmons Building (HCM #696; constructed 1954).

After careful review of the Draft Environmental Impact Report (DEIR) in 2011, the Cultural Heritage Commission submitted a formal communication to the Department of City Planning expressing concern over the proposed demolition and supporting an adequate preservation alternative.

After thoughtfully reviewing the FEIR and listening to testimony at scheduled public hearings, the Cultural Heritage Commission provides the following comments:

1) The Cultural Heritage Commission opposes the demolition of the Barry Building and supports the Preservation Alternative (Alternative 4) that retains and integrates the Barry Building into the proposed project.

Any concerted effort to purposefully demolish a Historic-Cultural Monument for a replacement project is unacceptable. Pursuing the demolition of the Barry Building imperils the over 1,000 Historic-Cultural Monuments in the City of Los Angeles and sets a dangerous precedent.

The Cultural Heritage Commission believes that the Barry Building can be integrated into a new development while also meeting and exceeding the project goals of the proposed project. Other projects throughout the City of Los Angeles have been successful in incorporating Historic-Cultural Monuments through the guidance and support of the Cultural Heritage Commission and its Office of Historic Resources. We strongly support sensitive reuse of historic resources for new projects.

While the DEIR states that Alternative 4 may not meet Objective 1 and that “retention of the Barry Building may affect the architectural integration of the overall project,” the Cultural Heritage Commission’s response is to simply have the proposed development’s design better respond to the Barry Building’s mid-twentieth century design. These design modifications can be minimal and do not have to fundamentally alter the site planning and square-footage of the proposed project.

As identified in the FEIR, Alternative 4 proves to be the environmentally superior alternative. Having the same number of parking spaces as the proposed project with only a 5% reduction in square footage, a preservation alternative should also be able to meet the economic goals under Objective 4. With only minor design changes, Alternative 4 can also easily meet all project objectives without being rendered infeasible.

2) The Cultural Heritage Commission and the staff of the Office of Historic Resources will work with project representatives to further develop a successful Preservation Alternative.

The Cultural Heritage Commission and the Office of Historic Resources commit to serve as a resource to further refine the Preservation Alternative within the parameters of the FEIR to meet project objectives and goals. As supported by qualified preservation consultant reports in the FEIR, renovations and modifications to the Barry Building under the Preservation Alternative would not significantly alter its character-defining features and can comply with the Secretary of the Interior’s Standards for Rehabilitation. OHR staff is available to review and discuss changes to better incorporate the subject building into the new project once plans are developed and refined.

As stated in previous communications, the Cultural Heritage Commission also supports a building permit process in the future that would facilitate the construction of the proposed project under the preservation alternative. By not flagging properties beyond the subject building address, Office of Historic Resources review would be limited only to the existing building. This may potentially also permit some allowances from mandated building code upgrades, facilitating the successful reuse of the Barry Building.

3) The Coral Trees on the San Vicente Boulevard median (HCM #148) must not be altered or modified.

The Coral Trees on the median strip of San Vicente Boulevard between 26th Street and Bringham Avenue are Historic-Cultural Monument #148. The coral trees are part of the elegance of the San Vicente Blvd commercial corridor and are a major character-defining feature of the area. Removing and altering the coral trees and the median under the FEIR's optional proposals is unacceptable. The cumulative impact of past and potential future alterations to this landscaped median in other sections is also a concern for the Cultural Heritage Commission.

The Cultural Heritage Commission urges the City Council to support the selection of the preservation alternative as it both ensures the protection of the Barry Building as a Historic-Cultural Monument and allows for the proposed development to proceed. The future of other Historic-Cultural Monuments in the City of Los Angeles will be directly impacted by the results of the Environmental Impact Report for this project and we urge you to prevent the loss of a significant Historic-Cultural Monument.

Thank you for this opportunity.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Richard Barron', with a large circular flourish at the end.

RICHARD BARRON, President
Cultural Heritage Commission

642 S Saltair
(Demolished by Applicant)

644 S Saltair
(Demolished by Applicant)

11991 San Vicente
(Demolished by Applicant)

11977 San Vicente
(Demolished by Applicant)

S Saltair Ave

W SAN VICENTE BLVD

SAN VICENTE BLVD

DEPARTMENT OF
CITY PLANNING
200 N. SPRING STREET, ROOM 525
LOS ANGELES, CA 90012-4801
AND
6262 VAN NUYS BLVD., SUITE 351
VAN NUYS, CA 91401
—
CITY PLANNING COMMISSION

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JUSTIN KIM
ROBERT LESSIN
BARBARA ROMERO
MICHAEL K. WOO
—
JAMES WILLIAMS
COMMISSION EXECUTIVE ASSISTANT II
(213) 978-1300

CITY OF LOS ANGELES CALIFORNIA



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FAX: (213) 978-1275

INFORMATION
www.planning.lacity.org

April 19, 2011

Hadar Plafkin, Environmental Review Coordinator
Department of City Planning
200 N. Spring Street, Room 750
Los Angeles, CA 90012

Dear Mr. Plafkin,

On behalf of the Cultural Heritage Commission, thank you for the opportunity to formally comment on the Draft Environmental Impact Report (DEIR) for the Green Hollow Square Project. As you know, the Barry Building located at 11973 W. San Vicente Boulevard is designated as Historic-Cultural Monument (HCM) #887 under the City of Los Angeles' Cultural Heritage Ordinance and would be demolished under the proposed project.

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The Cultural Heritage Commission urges the City Planning Department to address the comments and concerns raised in this letter. We urge the development of a viable preservation alternative that ensures the protection of the Barry Building as a Historic-Cultural Monument. The future of other Historic-Cultural Monuments in the City of Los Angeles will be directly impacted by the results of the Environmental Impact Report for this project. Please continue to integrate the Cultural Heritage Commission on any future proposed projects that impact Historic-Cultural Monuments.

Thank you for this opportunity.

Sincerely,

A handwritten signature in black ink, appearing to read 'Richard Barron', with a large, stylized circular flourish at the end.

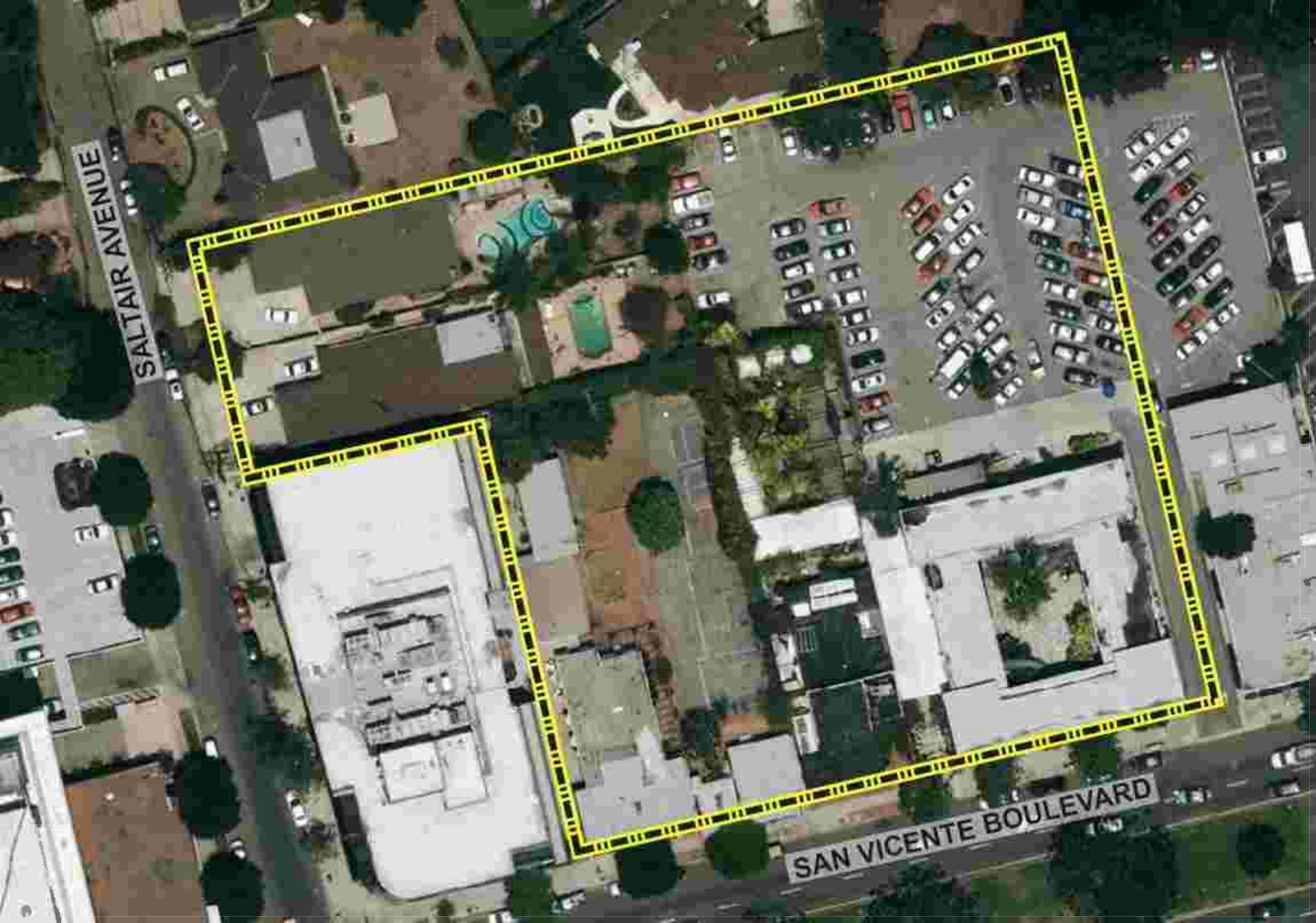
RICHARD BARRON, President
Cultural Heritage Commission



Source: R.A. Keller Associates, 2011.

SALT AIR AVENUE

SAN VICENTE BOULEVARD





James Harris <james.harris@lacity.org>

Comment Letter on DEIR for Barry Building

1 message

Corin L. Kahn <clkesq@outlook.com>
To: James Harris <james.harris@lacity.org>

Tue, Apr 18, 2023 at 1:51 PM

Please add this letter to those submitted in connection with the City's solicitation for public comment on the DEIR. We look forward to reviewing and responding to those made in the Response to Comments.

By this email, Please add me to the list of persons who receive all notifications regarding this application and any others related to the Barry Building and any regarding the development of the surrounding vacant properties that are owned in common with the Barry Building.

--

PLEASE NOTE MY NEW CONTACT INFORMATION:

Corin L. Kahn, Esq.

401 Wilshire Blvd

12th Floor

Santa Monica, CA | 90401

Office: 424-252-4714

Email: clkesq@outlook.com



Blue Comment Letter on BARRY BUILDING DEIR.pdf
28672K

CORIN L. KAHN

ATTORNEY AT LAW

WRITER'S E-MAIL:
CLKESQ@OUTLOOK.COM

401 WILSHIRE BOULEVARD, TWELVTH FLOOR
SANTA MONICA, CALIFORNIA 90401

TELEPHONE
(424) 252-4714

OUR FILE NUMBER:

April 18, 2023

Via Email Only

James Harris

City of Los Angeles, Department of City Planning

221 N. Figueroa Street, Suite 1350

Los Angeles, CA 90012

(213) 978-1241

james.harris@lacity.org

Re: Comments on the Draft Environmental Impact Report for the Proposed Demolition of the Historic and Culturally Significant Barry Building Case No. ENV-2019-6645-EIR; SCH 2020110264 (11973 San Vicente Blvd) Previously: Case No. ENV-2009-1065-EIR (Green Hollow Square); SCH: 2020110210; Specifically focused on 11973 San Vicente Boulevard Project but also includes the related projects consisting of demolition and grading at: 11961, 11965, 11969, 11973, 11977, 11981 and 11991 San Vicente Boulevard, and 642 and 644 Saltair Avenue, Los Angeles, CA 90049.

Dear Mr. Harris:

This firm represents the Blue Family, who are homeowners and reside at the single-family home north of San Vicente Boulevard on Saltair Avenue. Their home is located in the residential neighborhood that surrounds the Proposed demolition of the historically and culturally significant Barry Building and an unannounced future development of uncertain scale and scope (referred to herein as the "Current Project") proposed for 11973 San Vicente Boulevard. The applicant owns all of the following surrounding properties consisting of: 11977 and 11991 San Vicente Blvd, 642 and 644 Saltair Ave, and 11901 Saltair Terrace, Los Angeles, CA 90049, which include the following Los Angeles County Parcel Nos: 4404-025-008, 4404-025-009, 4404-025-010, 4404-025-015, in the Los Angeles community of Brentwood (hereinafter referred to as the "Project Site" or "Subject Property.")

The purpose of this letter is to identify legal deficiencies in the Draft Environmental Impact Report ("DEIR") that has been published and circulated for public comment until April 18, 2023, under the applicable statutes, guidelines and case law comprising the California Environmental Quality Act (hereinafter referred to as "CEQA"), the Municipal Code and applicable planning documents of the City of Los Angeles (hereinafter referred to as the "City,") and the facts presented in the record and those known to the community that are relevant to

James Harris
City of Los Angeles, Department of City Planning
221 N. Figueroa Street, Suite 1350
Los Angeles, CA 90012
April 18, 2023
Page 2

City's consideration of whether to approve or disapprove the Project and other grounds submitted in opposition to the now pending proposal.

INTRODUCTION AND GENERAL OBJECTIONS

The California Environmental Quality Act (*Public Resources Code* Sections 21000 *et. seq.*, and Cal. Code of Regulations, Title 14, Sections 15000 *et. seq.*, hereinafter referred to as "CEQA") is a State statutory scheme that requires close examination of all aspects of a development project that result in any physical changes to the environment, which is broadly defined, both direct and indirect, including matters that are reasonably foreseeable. Based on this factually based analytical examination, supported by adequate expertise, the reviewing agency is required to avoid or at least reduce all adverse changes to the environment to the extent it is feasible to do so; or else to choose an alternative to the proposed project that avoids or reduces all adverse changes to the environment yet achieves the primary objectives of the proposed development.

The currently proposed demolition of the Barry Building is demonstrably the last step in the deliberate and calculated pattern of removal of several buildings (described herein) from several adjacent parcels intended to constitute an assemblage of parcels ("Assemblage") for the purpose of creating one very large empty piece of property (the "Undisclosed Project.") None of these steps have undergone any environmental review, despite the obvious relationship to one another measured by ownership and a future (undisclosed) plan. Given the facts showing these relationships, CEQA required early disclosure of this foreseeable plan. This did not occur.

The limited subject matter for this Draft Environmental Impact Report ("DEIR") is the proposed demolition of the Barry Building, only. Accepting the fiction, i.e., that the developer seeks only to demolish plus replace it with a vacant lot surrounded by fencing and a minimal landscaping buffer from the sidewalk at San Vicente for an indeterminant amount of time, City and the public alike must respond to this limited scope of the DEIR because that is all that is presented and pending. Although it is clearly a fiction, it is the only actual "project" for CEQA purposes presented by the developer ("Current Project.")

It is reasonably foreseeable that the ultimate project, will be the re-development of the Assemblage (the "Ultimate Project.") Again, only for argument's sake but without conceding as fact, the developer's fiction that this is not currently foreseeable, which if it were true would be entirely legal and reasonable, then it must be concluded that the time for consideration of anything at all, including the Current Project is not ripe.

These statements are based on facts that are well documented in the record. They raise important legal consequences for the developer that have a direct impact on the choices available to the City based on the record. These legal consequences support the objections to the proposed demolition permit and for the proposed certification of the DEIR.

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The Blue Family specifically reserves the right to submit additional comments and materials including without limitation: to the Response to Comments as part of comments on the Final Environmental Impact Report; the staff report(s) issued in connection with hearings on this matter; and in connection with a separate challenge to the applicability of the supposed grounds for seeking the demolition of the Barry Building and replacing it with a vacant lot for an indeterminant amount of time – the Order to Comply with the Soft Story Ordinance - on the grounds that on its face the ordinance excludes from its scope the Barry Building as designated building with historically significance which renders the Order *void ab initio*.

The following constitutes a partial list of specific objections to the insufficiency of the DEIR meant to supplement and elaborate on the summary Introduction set forth above.

FACTUAL BACKGROUND

The Blue family knew Irma and Raymond Ziff, the original owners of the single family homes on 642 and 644 South Saltair Avenue. The Ziff's owned the Westward Ho grocery store chain including the store located at 11737 San Vicente Blvd, Los Angeles, CA 90049, which is now the Whole Foods Market.



642 and 644 South Saltair Avenue
(Source: Google Streetview (Jul-2009))¹



642 and 644 South Saltair Avenue
(Source: Google Streetview (May-2015))

My client remembers the Barry Building and the surrounding properties, as well as the businesses being very active and lively. He and some of the neighborhood children who attended the public Brentwood School (now known as Brentwood Science Magnet School) would stop by Vicente Foods, pick up candy or ice cream and go over to the Barry Building and sit on a bench in the courtyard of the building.

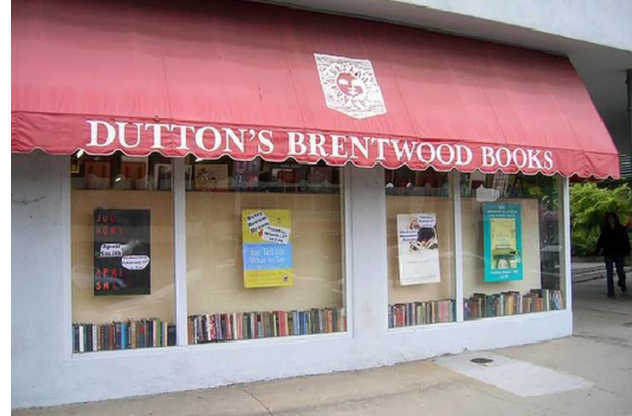
He would go to “Brentwood Books”, which later became Dutton’s Brentwood Books, to look at magazines and books on Sports and Cars. For a young boy growing up next to the walkable San Vicente Boulevard and having several small shops nearby was something that was fun back then, and can be fun again for the next generations growing up in the Saltair Avenue neighborhood.

¹ PDF with all images as part of the Factual Background are included as (Attachment A)

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1965 - Brentwood Books
Source: Movie "Sylvia"



Source: Racked LA (Mar-2008)

My client also knew an elementary school classmate who lived on Saltair Terrace. Many times, he and his classmate would walk down Saltair Terrace and through an easement gain access to the parking lot of the Barry Building property.

Another shop that was home next door to the Barry Building was California Jungle Garden, which later became Trellis, a flower shop, which the Blue Family as well as other neighbors patronized regularly.



Former Del Mano Gallery and Trellis Florist at
11977 San Vicente Blvd.
Source: Google Streetview (Jul-2009)



11977 San Vicente Blvd.
Source: Google Streetview (Oct-2014)

Just a little west of the flower shop and the Barry Building was the Bonner School, which was located 11991 San Vicente Blvd. A teacher at this school tutored my client in cursive handwriting.

The Bonner School also hosted an annual fundraising Fair, which my client and his sister attended.



Bonner School at 11991 San Vicente Blvd.
Source: Google Streetview (Jul-2009)



11991 San Vicente Blvd.
Source: Google Streetview (Oct-2014)

The applicant completely demolished the Bonner School Building in 2014 along with 3 other structures that were part of the now “withdrawn” Green Hollow Square Project, which is elaborated in detail below.

History of Project Site:

The applicant owns 8 parcels which include the Barry Building and adjacent properties.

Attachment B to this letter included the following:

- A table showing all the properties owned by the applicant
- A highlighted parcel map showing the parcels referenced in the table
- Secretary of State information for the two Limited Liability Companies (LLC) owning all 8 parcels
- Property profiles linking the addresses and parcels numbers to the owner.

All of these parcels, except 11901 Saltair Terrace, were part of the Green Hollow Square Project.

Except for the Barry Building, all structures were demolished as described in the Green Hollow Square Project after the zoning entitlement application was withdrawn by the applicant on October 31, 2013.

These 8 parcels, which comprise the Assemblage, are as follows:

1. 11973 San Vicente Blvd, AIN 4404-025-008 (***The Barry Building***)

This parcel was transferred to **11973 San Vicente, LLC** with Charles T Munger and William Harold Borthwick listed as Managers/Members on April 20, 2017.

2. 11977 San Vicente Blvd, AIN 4404-025-009

This parcel was transferred to **11973 San Vicente, LLC** with Charles T Munger and William Harold Borthwick listed as Managers/Members on April 20, 2017.

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The building was demolished in 2014 and has been a fenced in dirt lot since then (for 9 years).

3. 11991 San Vicente Blvd, AIN 4404-025-010 (The former Bonner School Building (Opened in 1939),

This parcel was transferred to the **11991 San Vicente, LLC** with Charles T Munger and William Harold Borthwick listed as Managers/Members on April 20, 2017.

The building was demolished in 2014 and has been a fenced in dirt lot since then (for 9 years).

4. AIN 4404-025-015 (there is no address associated with this parcel)

This parcel was transferred to **11973 San Vicente, LLC** with Charles T Munger and William Harold Borthwick listed as Managers/Members on April 20, 2017.

This parcel is part of a paved parking lot associated with the Barry Building.

5. AIN 4404-025-016 (there is no address associated with this parcel)

This parcel was transferred to **11973 San Vicente, LLC** with Charles T Munger and William Harold Borthwick listed as Managers/Members on April 20, 2017.

This parcel is part of a paved parking lot associated with the Barry Building.

6. 644 S. Saltair Ave, AIN 4404-025-027

This parcel was transferred to **11991 San Vicente, LLC** with Charles T Munger and William Harold Borthwick listed as Managers/Members on April 20, 2017.

The single-family house with pool was demolished in 2014 and has been a fenced in dirt lot since then (for 9 years).

7. 642 S. Saltair Ave, AIN 4404-025-028

This parcel was transferred to **11991 San Vicente, LLC** with Charles T Munger and William Harold Borthwick listed as Managers/Members on April 20, 2017.

The single-family house with pool was demolished in 2014 and has been a fenced in dirt lot since then (for 9 years).

8. 11901 Saltair Terrace, AIN 4404-026-008

This parcel was transferred to **11991 San Vicente, LLC** with Charles T Munger and William Harold Borthwick listed as Managers/Members on April 20, 2017.

The single-family house was demolished in 2007 and has been a fenced in dirt lot since then (for 16 years).

Self-Imposed Blight Created by Applicant:

The evictions of tenants from the Barry Building at the end of 2016 and the demolition of the two single family homes on Saltair Ave, as well as one single family home on Saltair Terrace, plus the demolition of two commercial buildings on San Vicente Blvd have unnecessarily created a **dead zone** that looks ugly, feels unsafe, and has become a self-imposed blight created by the applicant.

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My client is asking why this applicant is making the neighbors and visitors live with these empty lots for almost a decade, and in the case of 11901 Saltair Terrace, over one-and-a-half decades when what constitutes the admitted foreseeable future for the Subject Property is to leave a “vacant dirt lot”? (*Project Description, ENV-2019-6645-EIR*)

None of the 5 demolished structures, were under any order to comply with the soft story retrofit ordinance or any other code enforcement issue.

REGULATORY BACKGROUND

From the Cultural Heritage Commission letter dated April 19, 2011 to Hadar Plafkin commenting on the DEIR for the Green Hollow Square Project:

“The Barry Building is a rare example of a commercial mid-20th century modern Historic-Cultural Monument.

When designated as a Historic-Cultural Monument, the Barry Building met Cultural Heritage Ordinance criteria for “embodying the distinguishing characteristics of an architectural type specimen, inherently valuable for a study of a period style or method of construction” as an example of International Style commercial architecture. Apart from the potential loss of the designated historic resource, the Barry Building is one of the few very rare examples of commercial mid-twentieth century modern design in the register of Historic-Cultural Monuments.

In fact, a preliminary review suggests that the Barry Building is only one of three modernist commercial buildings out of nearly 1000 designated Historic-Cultural Monuments: the only other two are the Neutra Office Building (HCM #676; constructed 1951) and the Jones and Emmons Building (HCM #696; constructed 1954).” (*DEIR comment letter, ENV-2009-1065-EIR (Green Hollow Square)*)

The letter also states:

“The Cultural Heritage Commission’s primary responsibility in its capacity as a Mayor-appointed decision-making body is to oversee the preservation and safeguarding of the City of Los Angeles’ nearly 1000 Historic-Cultural Monuments. Since its establishment in 1962, demolition of an HCM is contrary to the goals and principles of the Cultural Heritage Commission and the Cultural Heritage Ordinance. **This Commission exists for the promotion and protection of Historic-Cultural Monuments and takes very serious the prospect of an HCM being eliminated forever.**” (*DEIR comment letter, ENV-2009-1065-EIR (Green Hollow Square)*) (**Bold added for emphasis**)

In the 2011 Cultural Heritage Commission Letter, the CHC President commented:

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“With the departure of Dutton’s Brentwood Bookstore and the introduction a new tenants to the storefront spaces, greater transparency and views have been restored to the Barry Building that bring it closer to t its c. 1951 appearance. **Along with the continued maintenance by the property owner, current photographs of the Barry Building reveal it to be in excellent condition.**” (*DEIR comment letter, ENV-2009-1065-EIR (Green Hollow Square)*) (**Bold added for emphasis**)

Below are photographs showing the Barry Building in 2009 and 2016, when the building was still in operation, had several tenants and was maintained (Attachment C):



Source: Google Streetview (Jul-2009)



East side of Courtyard looking toward San Vicente Blvd

Source: Patch (2012)



The view from the back balcony towards the street side, showing the cantilevered 2nd floor

Source: Laura Clayton Baker (2016)



The view from the 2nd floor balcony across the courtyard

Source: Laura Clayton Baker (2016)



Courtyard Café

Source: Laura Clayton Baker (2016)



Courtyard

Source: Ty Miller (2016)

But since the eviction of the tenants at the end of 2016, the applicant has allowed the building to decay by neglect.

Furthermore, in their July 12, 2007 Recommendation Report, Case No. CHC-2007-1585-HCM, the Cultural Heritage Commission recommended that the Barry Building be declared a Historic-Cultural Monument. They found that:

“1. The building "embodies the distinguishing characteristics of an architectural type specimen, inherently valuable for a study of a period style or method of construction" as an example of International Style commercial architecture.

2. The property reflects "the broad cultural, economic, or social history of the nation, State or community" for its association with the development of the San Vicente commercial corridor in Brentwood.”

“Built in 1951, this two-story commercial building exhibits character-defining features of mid-twentieth century International Style architecture. The flat-roofed rectangular building is organized around a central courtyard and opens to the street under a front façade raised one floor above the sidewalk on small steel pipe columns, in the style of pilotis. The exterior is clad in stucco with wood trim. Windows are floor to ceiling grid and louver windows on the interior courtyard with smaller steel frame windows on the façade. The raised front façade consists of an unadorned stucco plane with a simple horizontal band of windows treated with operable vertical sunshades.

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Beneath the southeast corner a small freestanding structure serving as a storefront sits slightly askew to the orthogonal grid of the building. A garden courtyard extends beneath the building, creating an entrance off the street while maintaining the enclosure of the courtyard. Surrounding the open courtyard on two levels are small office suites, accessed by two curving stairs, located on diagonal corners. The staircases have concrete-filled steel pan treads that cantilever from a central concrete pedestal punctuated with triangular decorative openings. Steel pipes support both the stair and second floor walkway railings, with exposed detailing such as exposed metal plates and bolts serving as decorative elements. A surface parking lot at the rear of the property lot connects to the subject building's courtyard via a small breezeway. Significant landscape features include the mature tropical plants in the courtyard.

The subject building is a well-preserved example of a mid-twentieth century California variant of International Style modern architecture. The subject building was designed by architect Milton Caughey (1911-1958), winner of four Merit Awards by the Southern California Chapter of the AIA. Two of Caughey's residential designs, the Garred House (1949) and Goss House (1950), were cited in the first edition of David Gebhard and Robert Winter's seminal *Guide to Architecture in Southern California* (1965).” (*Recommendation Report, Case No. CHC-2007-1585-HCM, July 12, 2007*)

On October 2, 2007 the Los Angeles City Council adopted the Findings in the July 12, 2007 Los Angeles Department of City Planning Recommendation Report and declared the Property a Historic-Cultural Monument per Los Angeles Administrative Code Section 22.125. (*CF # 07-2309*) (Attachment D).

Neither the applicant or any of the applicant’s representatives objected to the recommendations by the Cultural Heritage Commission (CHC), or the recommendations by the City Planning Department to designate the Barry Building as a Historic-Cultural Monument. Nor did the applicant or any of the applicant’s representatives appeal the final decision by the Los Angeles City Council in order to prevent the Barry Building from becoming a Historic-Cultural Monument.

Also, the subject property is located in front of a median with Coral Trees on San Vicente Boulevard, a landscape feature designated as **Historic-Cultural Monument #148**.

The February 7, 2012 article in the South Brentwood Residents Association’s (SBRA) newsletter shows that “Horticulturist Samuel Ayres, **Dave Barry** and Hugh Evans persuaded the city to plant coral trees, native of South Africa, for their remarkable beauty.” (Attachment E)

This shows that the original owner of the Barry Building, David (Dave) Barry was not only invested in the community, but also its beautification and its culture.

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Mr. Barry also constructed another development that became home to a nursery in the west section of the parcel. The nursery opened at the same time as the Barry Building and specialized in introducing new varieties of palms to Southern California. The nursery site consisted of a front gable greenhouse, with an open garden area located behind. California Jungle Gardens occupied the space from 1951 into the 1980s. (*ENV-2019-6645-EIR*, *DEIR*, *Appendix C-1*)

Later on, “Trellis Florist” became another botanical shop. The Fishtail Palm Trees that were once raised there grew through the pots they were planted in and rooted themselves into place and created a unique, secluded paradise.

All of that community flair and flow of life, vibrancy and walkability has been demolished along with the structures that once stood along San Vicente Boulevard. The overall excitement that once was visible from several blocks away along the boulevard has vanished.

Walking the stretch of sidewalk along the project address as well as the adjacent properties has become unsafe due to lack of lighting as well as broken sidewalks caused by uprooted tree roots.

The July 12, 2007 Recommendation Report from the Cultural Heritage Commission also , Case also recognizes two specified Historic-Cultural Monument criteria when it writes:

The Barry Building property successfully meets two of the specified Historic-Cultural Monument criteria: 1) "embodies the distinguishing characteristics of an architectural type specimen, inherently valuable for a study of a period style or method of construction" and 2) reflects "the broad cultural, economic, or social history of the nation, State or community." As a commercial building designed in the International Style that helped shape the development of the San Vicente commercial corridor in Brentwood, the property qualifies for designation as a Historic-Cultural Monument based on these criteria.

The architectural design and layout of the subject building is a distinguished example of mid-20th century modern architecture in Southern California and the influence of Corbusier and the International Style. Its highly original use of a courtyard space with modern design elements presents a unique example of International Style architecture in Los Angeles. Although appearing seemingly sparse and modest in design at first glance, closer inspection of the subject building reveals subtle design features and detailing such as curving cantilevered stairs, pilotis-style posts, grid and louver windows, metal railings, slightly angled storefronts, and solid smooth unornamented surfaces. The successful combination of design, scale, landscaping and pedestrian accessibility, often rare with mid-20th century commercial buildings, also contributes to the originality of the Barry Building's architecture.” (*July 12, 2007 CHC Recommendation Report, Case No. CHC-2007-1585-HCM*)

PROCEDURAL BACKGROUND

The Applicant had previously introduced the “Green Hollow Square Project” in 2010 (ENV-2009-1065-EIR), which was withdrawn on October 31, 2013.

However, the Assemblage of properties and the later demolition of the structures on those properties are clearly connected with the current project.

The Green Hollow Square Project was described as follows in the City Planning’s Project description:

Project Description: The applicant proposes to develop a neighborhood-oriented commercial center that would include approximately 51,500 square feet of retail uses, 6,800 square feet of restaurant uses, 7,000 square feet of storage uses, and 8,000 square feet of office uses, amounting to approximately 73,300 square feet of floor area of neighborhood oriented commercial uses in a single building. In addition, 3,700 square feet of outdoor dining space within the courtyards and terraces of the commercial center is proposed. The building would contain two stories and would be approximately 39.5 feet in height. The project would include a clock tower or similar architectural element of up to 50 feet in height. The project site is bounded by San Vicente Boulevard to the south, Saltair Avenue and an existing commercial building to the west, single-family residences to the north, and a single-story on-grade commercial structure and parking lot to the east. Figure 1 provides the regional location of the project and Figure 2 shows an aerial view of the project site.

The proposed project involves demolition of all existing buildings on the project site, which include five commercial structures and two single-family dwellings. One of the commercial structures, known as the “Barry Building” was designated as a Historic-Cultural Monument in 2007 (Monument No. LA-887).

The project design features groupings of multiple tenant spaces, ranging from approximately 500 to 5,000 square feet, which would be oriented around open courtyards. The proposed project would be built above a one-level subterranean parking garage that, together with at-grade parking, would provide a total of 427 on-site commercial parking spaces. Parking will be accessible from two driveways on San Vicente Boulevard, the northern/western driveway operating as an entry-only access and the southern/eastern driveway providing exit-only operations. (*Los Angeles Department of City Planning*)

The events below show the chronology of how the Green Hollow Square Project proceeded from the start and beyond the project withdrawal.

Please note that even though demolition of the two single-family homes and two commercial buildings were part of the Green Hollow Square Project entitlement application and

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description, demolition permits were applied for prior to approvals and prior to the project being withdrawn. Demolition continued after the project was withdrawn on October 31, 2013.

Chronology Of Green Hollow Square (the Undisclosed Project):

10/2/2007: LA City Council Adopts HCM for the Barry Building.

The recommendation by the Cultural Heritage Commission for the Barry Building to become a Historic-Cultural Monument (#887) was adopted by a unanimous vote of the Los Angeles City Council. The owner/applicant did not appeal this decision. Ownership of Property remained the same through the present.

04/12/2010: NOP for DEIR Submitted to State Clearing House as Brentwood Town Green (Later renamed Green Hollow Square), SCH No. 2009061062, Case No. ENV-2009-1065-EIR

07/11/2013: 11977 San Vicente Blvd

PRE-INSPECTION DEMO PERMIT (Permit No. 13019-30000-01836) submitted for Two, 1-Story Commercial Buildings

The demolition of these Commercial Buildings was originally part of the Green Hollow Square project.

07/11/2013: 642 and 644 S. Saltair Ave

PRE-INSPECTION DEMO PERMIT (Permit No. 13019-30000-01833) submitted for ***Two single family dwellings***

The demolition of these homes was originally part of the Green Hollow Square project.

08/23/2013: 642 and 644 S. Saltair Ave

DEMO PERMIT SUBMITTED (Permit No. 13019-30000-02208) for Two single family dwellings.

The demolition of these homes was originally part of the Green Hollow Square project.

8/23/2013: 11977 San Vicente Blvd

DEMO PERMIT SUBMITTED (Permit No. 13019-30000-02218) for 1-Story Commercial Building

The demolition of this Commercial Building was originally part of the Green Hollow Square project.

8/23/2013: 11991 San Vicente Blvd

DEMO PERMIT SUBMITTED (Permit No. 13019-30000-02221) for 1-Story Commercial Building

The demolition of this Commercial Building was originally part of the Green Hollow Square project.

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10/31/2013: GREEN HOLLOW SQUARE PROJECT WITHDRAWN [PSOMAS/Joel B. Miller letter to Greg Shoop dated 10/31/2013]

02/13/2014: 642 and 644 S. Saltair Ave

DEMO PERMIT ISSUED (Permit No. 13019-30000-02208) for Two single family dwellings
The demolition of these homes was originally part of the Green Hollow Square project.

02/13/2014: 11977 San Vicente Blvd

DEMO PERMIT ISSUED (Permit No. 13019-30000-02218) for 1-Story Commercial Building
The demolition of this Commercial Building was originally part of the Green Hollow Square project.

02/13/2014: 11991 San Vicente Blvd

DEMO PERMIT ISSUED (Permit No. 13019-30000-02221) for 1-Story Commercial Building
The demolition of this Commercial Building was originally part of the Green Hollow Square project.

08/22/2014: 642 and 644 S. Saltair Ave

DEMO PERMIT FINALED (Completion) (Permit No. 13019-30000-02208) for Two single family dwellings
The demolition of these homes was originally part of the Green Hollow Square project.

3/9/2016: 11977 San Vicente Blvd

DEMO PERMIT FINALED (Completion) (Permit No. 13019-30000-02218) for 1-Story Commercial Building
The demolition of this Commercial Building was originally part of the Green Hollow Square project.

05/18/2017: 11991 San Vicente Blvd

DEMO PERMIT FINALED (Completion) (Permit No. 13019-30000-02221) for 1-Story Commercial Building
The demolition of this Commercial Building was originally part of the Green Hollow Square project.

Chronology of the Application to Demolish the Barry Building (the Current Project):

The Barry Building has been vacant for many years. For this reason, there can be no threat to the health and safety of any occupants – there simply are none.

Second, the building has been boarded up to prevent entry and the entire Subject Property has been secured by a solid fencing system. Therefore, there is limited, if any, risk of threat to the health and safety of persons on the property.

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Furthermore, there is a considerable distance between the building and the sidewalk. There is fencing along the entire sidewalk at San Vicente. These two facts together further limit the remote but possible risk of harm to passersby in the event of an earthquake which would only arise with the remote possibility of a total collapse of the building.

It must be noted that the Barry Building withstood the last two major earthquakes, including the 6.7 magnitude Northridge Earthquake in 1994 and 1971 San Fernando Earthquake. Clearly this anecdotal information does not fully inform the question of risk associated with the next earthquake, but it is substantial evidence of limited risk.

It should be noted that the Applicant did not perform any stress tests to ascertain more precisely the degree of significant risk, in any.² It cannot be disputed that there is a risk of collapse of many buildings that are not subject to the Ordinance that the citizens of Los Angeles live and work in every day.

On or about March 1, 2018, City issued the Applicant an Order to Comply with LAMC Ordinance 183893, City's so-called "Soft Story Ordinance."

09/18/2019: 11973 San Vicente Blvd (Barry Building)

PRE-INSPECTION DEMO PERMIT (Permit No. 19019-10000-04750) submitted.

11/06/2019: 11973 San Vicente Blvd (Barry Building)

DEMO PERMIT (Permit No. 19019-10000-05593)

11/18/2020: 11973 San Vicente Blvd (Barry Building)

Notice of Preparation (NOP) for 11973 San Vicente Blvd Project (Demolition of Barry Building).

02/16/2023: 11973 San Vicente Blvd (Barry Building)

Notice of Completion and Availability of DEIR

The stated reason for demolishing the Barry Building is that the City has issued its owners an Order to Comply with the City's Soft Story Ordinance, LAMC 183893, (the "Ordinance.") The Ordinance was adopted to cause owners to harden certain buildings vulnerable to earthquake damage due to construction and/or engineering deficiencies. The Ordinance provides time limits and choices for compliance including demolishing the building. The Applicant states it has chosen to comply with the Order to Comply by demolishing the Barry Building. In essence, the basis for seeking the demolition permit is that the City is forcing the Applicant to take this step.

² The word famous Watts Towers were under a similar Order to Comply in the 1950's to demolish until an intrepid group of architects and engineers devised a stress test to demonstrate they were safe. Luckily, today, 70+ years later, they still stand as a cultural and aesthetic monument to the achievements of mankind.

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But this simple notion is incorrect and misleading for many reasons. First, however straight forward this may seem at first glance, it is untrue. The Ordinance contains an exception for buildings that would include the Barry Building, that are historic.

The Ordinance, at Section 91.9308 states:

SEC. 91.9308. HISTORICAL BULDINGS.

*Qualified historical buildings **shall** comply with requirements of the California Historical Building Code established under Part 8, Title 24 of the California Code of Regulations. (Emphasis added.)*

When reading and interpreting the meaning of an ordinance, use of the word “shall” means must. Here, the Ordinance can only be read to mean that compliance with the Ordinance is not required for the designated historically and culturally significant Barry Building. The entire premise for demolishing the Barry Building is not supported by the law.

The Appendices of the DEIR provide good information from which it can be inferred that demolition is not the least inexpensive solution to addressing any legitimate health and safety risk the Barry Building may present to the public given its currently secured and isolated state. Rather, the least expensive means to do that would be to construct a simple series of temporary wooden frame bracings to complement the poles and address the currently unaddressed issue of shear (lateral) forces that could cause damage to the building in the event of an earthquake during the interim period to allow the opportunity for the future of the Barry Building, if any, is committed to.

There are economic incentives available to owners of historic buildings that the Applicant could consider to avoid what then would be an unnecessary demolition.³ (See the California Office

³ **1. FEDERAL INCENTIVES**

Advisory Council on Historic Preservation (ACHP)
Community Development Block Grants (U.S. Department of Housing and Urban Development)

Preservation Tax Incentives for Historic Buildings (National Park Service)

- 20% Rehabilitation Tax Credit
- 10% Rehabilitation Tax Credit
- Charitable Contributions (Easements)
- Investment Tax Credit for Low Income Housing (Affordable Housing)

TEA-21: Intermodal Surface Transportation Efficiency Act (ISTEA)

United States Small Business Administration (SBA)

2. STATE INCENTIVES

California Heritage Fund (Proposition 40)
Certified Local Government Grants (CLG)

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of Historic Preservation Technical Assistance Series attached hereto as ATTACHMENT F.) At a minimum, the existence of these opportunities undermines the pretense of the inevitability that

Earthquake Retrofit Programs (state and local)
Marks Historical Rehabilitation Act
Mills Act Property Tax Abatement Program
Seismic Bond Act
Williamson Act Program

3. LOCAL INCENTIVES

Introduction: Local Incentives
Adaptive Reuse Ordinances
Business Improvement Districts
Planning and Zoning
Additional Local Incentives

4. ALTERNATIVE INCENTIVES: Grants, Loans, Credits, and Deductions

The 1772 Foundation
Americans with Disability Act (ADA) and Tax Incentives

- Disabled Access Tax Credit (26 USC 44)
- Expenditures to Remove Architectural and Transportation Barriers to the Handicapped and Elderly, as amended (26 USC 190) Getty Center Grants
- Architectural Conservation Planning Grants
- Architectural Conservation Implementation Grants
- Campus Heritage Grants-National Endowment for the Arts (NEA)
- Grants for Arts Projects-National Endowment for the Humanities Grants (NEH)

National Trust for Historic Preservation

- National Main Street Center
- National Trust Loan Funds
- Preservation Development Initiative
- Tax Credit Equity Investments
- National Trust Community Investment Corporation
- National Trust Small Deal Fund
- Additional NTHP Programs

National Trust for Historic Preservation Forum Funds

- Cynthia Woods Mitchell Fund
- Johanna Favrot Fund
- Preservation Services Fund

Partners for Sacred Places
Save America's Treasures (SAT)

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the Applicant has promoted building must be demolished because the City has left the Applicant without alternatives.

There is nothing in the DEIR that discusses the only applicable rules regarding the issue of alteration/demolition of the Barry Building under California Title 8, Section 24. Apart from the need for disclosure of the actual rules applicable to the historic Barry Building there are opportunities contained within these rules for avoidance of the demolition.

Because the DEIR is premised falsely on the Order to Comply with the Soft Story, there are fundamental defects because of false, incomplete or misleading assumptions underlying the DEIR sections including the Project Description, the Alternatives Analysis, including the selection of alternatives to be considered., The analyses throughout the DEIR are based on the artificial, self-serving premise that the Barry Building must be demolished pursuant to the Order.

IMPROPER PROJECT DESCRIPTION

- As discussed herein, with respect to the artificial project description limiting it to the pretense that the Barry Building must be demolished, it is false and therefore an inadequate basis on which to structure this DEIR. The assumption that demolition is unavoidable and is being caused by the Order to Comply has prejudicially distorted the Project Description. This topic is discussed more fully herein.
- The comments to the NOP make a compelling argument that the true scope of the current application is more than what has been presented in the DEIR. The demolition permit is only a piece of the “whole of the contemplated action” including both the Undisclosed Project and the Ultimate Project, which the DEIR failed to address. (A copy of the NOP comment letter by the law firm of Robert Silverstein is attached without the attachments to that letter but is a part of this DEIR at Appendix A-3) (Attachment G)
- First, this point is demonstrated by the fact the DEIR project description remains unchanged from its limited scope stated in the NOP, despite objections. The project description remains defective for failing to acknowledge that it is merely one more step within a sequence of steps that already have occurred to clear the Assemblage of land shown to be owned and/or controlled by the same people, referred to herein as the Undisclosed Project. (Documentation demonstrating all of the surrounding lots, currently vacant, and the Barry Building is attached hereto.) (Attachment B);
- Unless the developer commits to the preservation of raw undeveloped land for a significant period, the public and the decision makers cannot reasonably accept any intended presumption that the sequential demolition of all of the buildings located on the Assemblage that has already occurred, of which the Barry Building is the most recent component, is anything less than one more component part of one whole redevelopment of the assemblage, i.e., the Ultimate Project.
- The community has lived for years without the pedestrian-oriented neighborhood serving commercial uses, which are required to fulfil the San Vicente Scenic Corridor Specific Plan policies, standards and guidelines for the now vacant lots where conforming

buildings once stood. This project fails to state whether this demolition permit will add to these “inconsistent” land uses and for how long

- Before proceeding with this project and this DEIR, the developer has a choice to make. This project cannot proceed under the pretense that it is only a demolition permit. As stated above, either the project is the conversion of this historic and culturally significant building to a vacant lot screened from San Vicente Boulevard by a chain link fence with a thin planting; strip or it is one of a series of steps to re-develop all of the commonly owned/controlled assemblage of properties. There must be a clear commitment to one of these in order for there to be a complete, accurate and objective disclosure and analysis of the impacts.
- An accurate (complete), stable and finite project description is required under Cal. Code Regs., tit. 14, § 15124. It is the *sine qua non* of CEQA analysis. Without such a project description, there can be no meaningful consideration including without limitations: alternatives analysis, consideration of “inconsistencies” under CEQA Guidelines Section 15125(d) or “conflicts” under Appendix G, land use; or long-term and indirect impacts, and aesthetics.
- The absence of clarity on the truth about the project description defeats the purposes of CEQA – disclosure, transparency, and timely consideration of the foreseeable environmental changes before they have reached ecological points of no return.
- The vacant properties are not open space, they are dead space. For the duration of the development of a project description and review, which could be years and experience allows a conclusion it could be decades, the use will be dead space. That land use does not promote any part of the applicable land use plans, policies, or regulations adopted to avoid or reduce an environmental impact. This indisputable and reasonably foreseeable physical change to the environment is also a necessary part of the project description.
- A considerable amount of the assembled property is zoned for parking. Again, unless the landowners intend to commit to dedicating this lot to parking, a zone change is a reasonably foreseeable discretionary permit. This constitutes one foreseeable component of the “redevelopment of the assemblage” and must be described as a necessary component of the project description.
- What the record demonstrates and is the inherent assumption behind this limited definition of the scope of the “project” is that for the foreseeable future, the site will be occupied by a temporary barricade, likely comprised of a chain-link fence as has been used at the adjoining properties, with a thin landscaping strip. The landscaping for the adjoining properties constitutes a visual barrier into these properties that materially conflicts with the purposes, land uses, and guidelines of the San Vicente Scenic Corridor Specific Plan. This physical and visual condition has been suffered by the community for many years and there is nothing in the record to defeat the clear inference that the Subject Property will be different.
- Since this is the admitted replacement of the historically and culturally significant Barry Building, and since there is no indication of the length of time it will remain the sole occupying structure on the property, it must be evaluated as a change in the land use in its own right. Thus, the proposed occupying structure itself is an element of the

“redevelopment of the assemblage” that must be identified as a component of the project description

- CEQA requires good faith. It does not require disclosure of matters that truly have not yet been decided. But CEQA has regulatory means to require public disclosure of the early stages of project development and therefore the consideration of them before too much investment has been made that the decision making is limited. EIRs can be supplemented or tiered in later stages of the development of the project definition. The availability of these regulatory vehicles reveal the less than good faith of the failure to disclosed more about the future intentions regarding the development of the assemblage of properties.
- The evidence submitted in the comments to the NOP shows that a very reasonable presumption can be drawn that the Green Hollow project, or some variation of it, has never been withdraw despite the pretense that it was.
 - The record demonstrates that only the specific application for it was symbolically withdrawn.
 - This is confirmed because advancing that project has proceeded step by step since 2013 with serial demolition permits issued and demolitions achieved.
 - All of these steps relate only to the assemblage of properties owned in common and that were and remain contemplated to be developed in common at an unspecified time in the future.
 - Therefore, the evidence suggests less than good faith on the part of the applicant with respect to disclosing the known or likely foreseeable future intentions about the development of the assemblage.
- CEQA disclosure requirements include the duty of informing the public about the decisions of its decision makers. If CEQA cannot require a developer to disclose long-term intentions, conceded here only for discussion’s sake, then City has the authority to deny the permit until the full scope of the developers intentions are ripe for disclosure.
- A denial of the ill-defined Project, currently defined only as demolition of the Barry Building, is particularly appropriate at the present time for good reasons:
 - Whereas the full scope of the project is not yet ripe, there can be no injury arising out the denial of the demolition permit;
- Whereas the Ultimate Project is not yet ripe, there remains the possibility that the Barry Building or perhaps elements of it, could be incorporated into the new development which would be foreclosed if the demolition is allowed to proceed (a copy of a rendering of the Barry Building incorporated into the larger Green Hallow project is attached.) (Attachment H);
 - The historic and cultural designation of the Barry Building invests the public with an interest in the future of the building. The community has a stake in the preservation of the building. And as the project is not yet ripe, the public’s interest in the preservation of the historic and cultural resource does not need to be foreclosed now or until the project is ripe for a full consideration.
 - When a specific project is finally presented, the public and the decision makers will have a choice to consider,

- That choice will have been predetermined by granting the demolition permit such that the choice will be the proposal or a vacant lot. Obviously
- Here, the public has a keen interest in the preservation of the historically and culturally significant Barry Building, where the alternative being offered presently is a vacant lot for an indeterminate amount of time. The proposed alternative is highly undesirable and should be rejected. (See additional comments on the inadequate “Alternatives” discussion in the DEIR.)
- There are many distortions that result from the serial, i.e., “piecemealing” approach being taken by the property owners of the assemblage.
 - Baseline assumptions are environmental conditions existing at the time the notice of preparation is published. Guidelines § 15125(a)(1). CEQA allows a different baseline only for situations that fluctuate without the control of the developer.
 - When the true scope of the Ultimate Project is revealed and presented for environmental review, the baseline will be the empty Assemblage of lots which generate zero impacts. *POET, LLC v. State Air Resources Bd.* (2017) 12 Cal.App.5th 52, 83
 - The choice of Alternatives between a vacant lot and full development of the “redevelopment of the assemblage” is different from the choice between the Barry Building and the “redevelopment of the assemblage.” Obviously as the public has an interest and a stake in preserving the Barry Building, that alternative must be included now because to leave it out, skews and likely predetermines the future Alternative analysis.
 - The vacant properties do not conform to the architectural and landscape guidelines of the Specific Plan. Furthermore, a barricaded vacant lot directly conflicts with the pedestrian amenities and so it fails to provide the contemplated ambiance intended to be preserved at that location and the neighborhood needed personal services and retail sales services intended. Therefore, the proposal to replace an historic building that did and could resume providing these things with vacant land conflicts with the very and stated intentions of the San Vicente Scenic Corridor Specific Plan
 - The vacant properties do not implement the policies mandated by the Scenic Highways Plan element of the City’s General Plan or in the Brentwood- Palisades Community Plan, to maintain the existing ambiance of San Vicente Boulevard. The Specific Plan, Section 8, subsection A requires considerable set back of open space which is an element of the intended pedestrian-scaled environment with special qualities, including access to small plazas. Therefore the proposal to replace an historic building with vacant land that is protected by a temporary wooden barrier conflicts with the applicable zoning
 - Therefore the proposal to replace an historic building with vacant land conflicts with the Community Plan

- These actual and identified components of the “project” raise issues of zoning compliance and conflicts/consistency with the applicable land use plans, policies, and regulations under CEQA Guidelines Section 15125(d) and Appendix G regarding thresholds of significance for land use regarding plans, policies and regulations adopted to mitigate adverse impacts on the environment.

“It is well established that ‘CEQA forbids ‘piecemeal’ review of the significant environmental impacts of a project.’ Rather, CEQA mandates ‘that environmental considerations do not become submerged by chopping a large project into many little ones—each with a minimal potential impact on the environment—which cumulatively may have disastrous consequences.’ Thus, the term ‘project’ as used for CEQA purposes is defined broadly as ‘the whole of an action, which has a potential for resulting in either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment’” (*Paulek v. Department of Water Resources* (2014) 231 Cal.App.4th 35, 45.)

In *Laurel Heights, supra*, 47 Cal.3d 376, the Supreme Court articulated the following test for unlawful piecemealing: “[A]n EIR must include an analysis of the environmental effects of future expansion or other action if: (1) it is a reasonably foreseeable consequence of the initial project; and (2) the future expansion or action will be significant in that it will likely change the scope or nature of the initial project or its environmental effects.

But CEQA has the means to examine the known and reasonably foreseeable impacts without knowing all of them and deferring those to a later time. (“*Of course, if the future action is not considered at that time, it will have to be discussed in a subsequent EIR before the future action can be approved under CEQA.*” (*Id.* at p. 396.)

The Guidelines describe several types of EIRs, which may be tailored to different situations. The most common is the project EIR, which this DEIR purports to be, which examines the environmental impacts of a specific development project. (Guidelines, § 15161.) A quite different type is the program EIR which ‘may be prepared on a series of actions that can be characterized as one large project and are related either: (1) Geographically, (2) As logical parts in the chain of contemplated actions, (3) As individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental effects which can be mitigated in similar ways.’ (Guidelines, § 15168, subd. (a).) This is what we have here.

That is of course only if the applicant has no information, such as the scope of a project as was revealed in the Green Hollow development, of some aspects about the future development of the assemblage of properties. Given that history and the steady removal of buildings within the area that was defined for Green Hollow, it is hard to imagine that the developer has no idea of any aspect of the future, perhaps at least enough of a vision to do a program EIR instead of limiting the scope to one piece of property independent of all of the surrounding properties as

though there was absolutely no relationship between them. If, on the other hand, it truly is to be regarded as separate, then this itself is a good reason to preserve the Barry Building until its separate and independent replacement is identified.

IMPROPER ALTERNATIVES ANALYSIS

INADEQUATE JUSTIFICATION FOR REJECTING AN ALTERNATIVE

- The stated reasons for rejecting the mothball option in accordance with Preservation Brief 31: Mothballing Historic Buildings, prepared by the National Park Service do not meet the requirements of CEQA Guidelines Section 15126.6 (c) that an EIR must explain the reasons for their rejections (DEIR pV-3) Why is it sufficient to reject an alternative based on it not being a long term solution when the record shows the Project itself, demolition and the planting of some mitigating shrubs, is not long term? In other words, the replacement, a fenced vacant lot, is no more a longer-term solution than the uncertain future of the Barry Building.
- The DEIR has created an artificial “project description.” It can easily be inferred that it was developed only to support a specific yet artificial intent – demolition of the Barry Building.
- However the record demonstrates that the true project objective, i.e., the long-term objective, is the re-development of the Assemblage of properties, the Ultimate Project.
- There is nothing in the record to suggest the maintenance of a vacant and severely cracked concrete parking lot is the long-term solution for the use of the lot. Such an inference defies common sense. CEQA requires decision making to employ common sense.
- Indeed, substantial evidence strongly suggests the opposite including, without limitation the following:
 - The demolition is not inevitable because the Soft Story Ordinance specifically allows special treatment of historic buildings and does not require strict adherence to the demolition requirement.
 - The demolition is not inevitable because the Soft Story Ordinance specifically allows for the owner to apply for a consideration of exceptions, which right has not expired
 - The single reason for rejecting the mothballed alternative– that it is not a long-term solution is a conclusory statement and it is disingenuous. If the only part of the project subject to the Order to Comply subject to the Soft Story Ordinance is mothballed until a fully formed long-term project can be presented to the City, then the Soft Story Ordinance no longer requires demolition.
 - It is not accurate, truthful, or a statement made in good faith that mothballing fails to accomplish the true and long-term objective. The compliance with the Soft Story Ordinance is only a pretext for getting rid of the building which once it is gone, precludes its integration into the full redevelopment of the assemblage of related properties over the long-term

- A project that is only an interim solution, by definition cannot be used to fulfil the requirement of a project description without substantial explanation for why it truly is the accurate and stable project description as required by CEQA
- The prior forms of the project known as Green Hollow demonstrate potential and/or likely future forms of the redevelopment of the whole assemblage of the related properties and therefore the true project description
- The elimination of a building that fully complies with the San Vicente Specific Plan and therefore that could feasibly be integrated as a portal into the new project would unnecessarily make a decision about the configuration of the future development that is not ripe. The elimination of that option by demolition would unnecessarily limit the options for development of the successor project and therefore, by definition cannot be the superior alternative – demolition will have an unnecessary, significant and fully avoidable impact
- The DEIR references a temporary construction fence
- The single piece of property has more value as an integrated whole within the assemblage of properties under the same or related ownership
- Promises to replace the home recently purchased and demolished single -family home north of the eastern most lot remain unfulfilled
- Mothballing the south building is the superior alternative. No good faith reason was given to reject the only identified alternative that does not cause any of the identified adverse impacts. Therefore, under CEQA it is the superior alternative.
- The record does not contain sufficient reasons to reject the Superior Alternative (the rejected Mothball Alternative)
- None of the factors that may be used to reject the Mothball Alternative are present or demonstrated in the record: 1) only the rejected Mothball Alternative fully meets all of the actual long-term project objectives; 2) the rejected Mothball Alternative is the most feasible of the alternatives; and 3) only the rejected Mothball Alternative fully reduces or avoids the significant impacts identified for the Project
- The preservation of the south building (the only building at issue strictly within the scope of the Project description), for later integration into a larger project that will occupy additional lots, is the means to best satisfy the goals and vision and provisions of the San Vicente Specific Plan

INADEQUATE RANGE OF REASONABLE ALTERNATIVES

The California Supreme Court has stated the specific requirements for the alternatives analysis in an EIR: "The CEQA Guidelines state that an EIR must 'describe a range of reasonable alternatives to the project . . . which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project'

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([Guidelines,] § 15126.6, subd. (a).) Moreover, as stated in the Guidelines, "[t]here is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason." (Guidelines, § 15126.6, subd. (a).) "The rule of reason 'requires the EIR to set forth only those alternatives necessary to permit a reasoned choice' and to 'examine in detail only the ones that the lead agency determines could feasibly attain most of the basic objectives of the project.' ([Guidelines], § 15126.6, subd. (f).)" (Bay-Delta, supra, 43 Cal.4th at p. 1163.)

In measuring whether the DEIR properly selected a meaningful range of alternatives to consider to avoid or lessen the significant environmental impacts identified in the DEIR, added to herein, the law requires a good faith reading of the Ordinance coupled with the many means to avoid the effects of that Ordinance, including without limitation the incentives to preserve if not remediate, the lack of any actual risk to health and safety that exceeds that which all citizens of the region live with everyday, and the interim nature of the future Project Site that opens up possibilities that might not otherwise apply.⁴

Clearly, for the same reasons the Project Description is artificially truncated by the omission of the many ways in which present demolition under the Order could be avoided, the selection of the range of alternatives too was artificially truncated.

One of the range of reasonable alternatives that without explanation was not included in the DEIR but which was discussed in connection with the Green Hollow proposal, was the incorporation of the Barry Building as a part of the redevelopment of the remainder of the Assemblage. Appearing before the Commission to present a detailed presentation on the Barry Building, Diane Caughey, daughter of the architect, said that even if building owner Munger changes his development plans for the project, "What is clear, however, is that this site provides an excellent opportunity to integrate a historic building with a new development."

It is an established fact, based on the history of the prior consideration of the development of the Assemblage by this Applicant, that the preservation of the Barry Building and its integration into a much larger project is a reasonable alternative for the future development of the Assemblage. Since it is a reasonable alternative to the redevelopment of the Assemblage, than it is a reasonable alternative to the proposed demolition of the Barry Building that must be included unless the DEIR can explain why it no longer is reasonable. It meets all of the CEQA criteria as it meets all of the true objectives of the Ultimate Project and is not distorted by the

⁴ The time in which to challenge the Ordinance has long ago passed. But it is shown above that the Ordinance does not apply to the Barry Building and therefore the Order is void *ab initio*, meaning from its inception. The Order to Comply has no force of law regarding the Barry Building. The Blue Family asserts that as member of the public, they intend to ask the Board of Building Commissions to confirm this exact interpretation of the Ordinance and that they have standing to ask the Board to order the rescission of that Order. Alternatively, Section 91.9306.5 of the Ordinance provides this Applicant expressly and interested members of the public including the Blue family implicitly with the opportunity to ask the Board for a modification of the Order to Comply under in Section 98.0403.2 of the Los Angeles Municipal Code. There are no time limitations provided for this means of relief.

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pretense of the Current Project which falsely depends on the self-serving reliance on the Order to Comply to truncate the selection of the range of reasonable alternatives.

IMPROPER ANALYSIS OF LAND USE IMPACTS

At DEIR page IV-D.11-12, the DEIR states that the governing threshold of whether a project has the potential to cause a significant land use impact is as follows:

(a) Land Use Consistency

- *Whether the proposal is inconsistent with the General Plan or adopted environmental goals or policies contained in other applicable plans*

(b) Land Use Compatibility

- *The extent of the area that would be impacted, the nature and degree of impacts, and the type of land uses within that area;*

Then the DEIR addresses the methodology for making these determinations, stating as follows:

The legal standard that governs consistency determinations is that a project must only be in “harmony” with the applicable land use plan to be consistent with that plan. (See Sequoyah Hills Homeowners Assn. v. City of Oakland (1993) 23 Cal.App.4th 704, As the Court explained in Sequoyah, “state law does not require an exact match between a proposed subdivision and the applicable general plan.” To be “consistent” with the general plan, a project must be “compatible with the objectives, policies, general land uses, and programs specified in the applicable plan,” meaning, the project must be “in agreement or harmony with the applicable plan.” (see also Greenebaum v. City of Los Angeles (1984) 153 Cal.App.3d 391, 406; San Franciscans Upholding the Downtown Plan, supra, 102 Cal.App.4th at p. 678.) Further, “[a]n action, program, or project is consistent with the general plan if, considering all its aspects, it will further the objectives and policies of the general plan and not obstruct their attainment.” (Friends of Lagoon Valley v. City of Vacaville (2007) 154 Cal.App.4th 807, 817.)

Strict conformity with all aspects of a plan is not required under the Government Code. This is in part because land use plans reflect a range of competing interests. Therefore, it is impossible for any project to be consistent with all of these different and often divergent interests. When making the findings required under the Government Code of consistency with the general plan, a proposed project should be considered consistent with a general plan or elements of a general plan if it furthers one or more policies and does not obstruct other policies. It is unquestioned that agencies should be given deference to determine consistency with their own plans

This may properly state applicable law regarding a determination of “consistency” under the State Planning and Zoning law (Government Code Section 65000 et seq.) But CEQA is not found under the Government Code. It is an entirely different and unrelated statutory scheme found at Public Resources Code Section 21000 et seq. and it serves an entirely different purpose.

CEQA findings require compliance, a concept wholly different from “consistency.” CEQA contains both substantive and procedural requirements that must be met in order to ensure complete, objective, accurate, and supported disclosure and consideration purposes of the statutory scheme. Whereas the doctrine of consistency allows weighing and balancing of competing interests, CEQA elevates one single goal – maximizing the protection of the environment wherever it is feasible. Also, the local interest is not entitled to deference because it is the State’s interest in protecting the environment that is required under CEQA.

CEQA requires an objective examination and disclosure based on facts, data, science, and studies. (*Berkeley Keep Jets Over the Bay Com. V. Board of Port Cmrs.*, (2001) 91 Cal.App.4th 1344, 1377) CEQA compliance requires discrete analysis of each aspect of a “project.” CEQA applies the much less deferential “fair argument” standard of review where there is evidence of any conflict with a plan, policy or regulation enacted to reduce or avoid an environmental impact, without deference to the local interest. (*Pocket Protectors v. City of Sacramento*, (2004) 124 Cal. App. 4th 903, 928) This standard applies to whether an EIR sufficiently considers the potentially significant impacts arising from an inconsistency, a divergence, or non-compliance with applicable land use plans, policies, or regulations adopted to avoid or environmental impact

The DEIR admits a significant “***conflict with several of the applicable goals, objectives, and policies, all of which are related to the preservation of historical resources, as the Project would result in the demolition of a designated historical resource.***” What has been left out of the analysis is the very significant conflict caused by the continuation and expansion of the elimination of the pedestrian-oriented neighborhood serving commercial uses, which are required to fulfil the San Vicente Scenic Corridor Specific Plan policies, standards and guidelines for the now vacant lots where conforming buildings once stood. The community has lived for years without these required land uses.

Specific plans are a statutory program to implement a stated vision and goals within a defined plan-area. (*Government Code* 65451.) Specific plans differ from a general plan, the latter comprising a local agency’s broad range of aspirational goals regarding a variety of subjects. (*Visalia Retail, LP v. City of Visalia*, (2018) 20 Cal. App. 5th 1, 19.) Here, the Specific Plan states that where there is conflict with the applicable zoning the Specific Plan governs. Both of these circumstances change the knee-jerk assumption that this issue is simply governed by the doctrine of consistency upheld in the many cases in which a consistency finding under the Government Code eclipses complete and accurate environmental analysis and compliance with the related matters under CEQA.

Zoning is measured objectively and in terms of compliance. (*People v. Djekich* (1991) 229 Cal. App. 3d 1213, 1225, footnote 7.) The rules of deference that may be used in considering “consistency” between a project and the general plan do not apply here when considering the inconsistency between the vacant lot with a chain link fence barrier to the Specific Plan. In measuring consistency, the court in *Defend the Bay v. City of Irvine* (2004) 119 Cal.App.4th 1261 (*Defend the Bay*), stated “*We are not dealing with assaying of minerals here. Balance does*

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not require equivalence, but rather a weighing of pros and cons to achieve an acceptable mix.” (Id. at pages 1268-1269. But unlike Government Code consistency analysis with the general plan the mode of analysis that must be employed in determining zoning compliance and in particular CEQA compliance regarding the divergences between these forms of the land use more closely resembles “*assaying minerals*” than it does “*weighing the pros and cons to reach an acceptable mix.*”

The community has lived for years without the pedestrian-oriented neighborhood serving commercial uses, which are required to fulfil the San Vicente Scenic Corridor Specific Plan policies, standards and guidelines for the now vacant lots where conforming buildings once stood.

This project fails to state whether this demolition permit will add to and further these “inconsistent” land uses and for how long. In the place of the required land uses is a chain link fence with a narrow planting strip that supports an absolute visual barrier into the properties. The pretense stated in the DEIR, which must be taken into account in assessing its compliance with CEQA is that developers have no idea what next will occur at the Project Site or the assemblage of properties. This constitutes an admission that the physical change that must be considered regarding land use conflicts is the indefinite continuation of what currently fails to comply with the Specific Plan, i.e., a direct conflict. The proposed new land use is inarguably antithetical to the Specific Plan.

The threshold of significance in subsection (b), regarding “compatibility” raises the same exact same issue as subsection (a) – “inconsistency.” A long stretch of San Vicente Boulevard on which is a chain link fence supporting a visual barrier immediately adjacent to the sidewalk in the place of pedestrian-oriented neighborhood serving commercial uses is not “compatible” with the adjacent land uses. Under the “compatibility” mode of analysis, with the facts presented here only serve to drive home further the point already made above.

These land use inconsistencies and incompatibilities must be disclosed and mitigated and considered in the alternatives analysis under CEQA before the DEIR may be certified as in compliance with CEQA.

IMPROPER ANALYSIS OF ADVERSE AESTHETICS IMPACTS

Appendix G, Aesthetics, subsection (b) states:

“Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?”

The DEIR determined that this threshold of significance was “less than a significant impact.”

Appendix G is intended to prompt a discussion on the specific topic, in this case aesthetics. It is not intended to be an exclusive list such that anything that does not strictly meet the three questions must not be considered. CEQA requires good faith and careful judgement in connection with all decisions. This is especially true when preparing an EIR.

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Subsections (a) and (b) are oriented to the natural setting. A vista is defined as a long view. Subsection b describes physical features of significance. After stating the words: “including but not limited to . . . “ which is an expansion not a limitation on the scope of this subsection, it also lists “historic buildings” as potentially significant scenic features. Clearly the facts here establish a building that received designation as historically significant because of its architectural beauty.

Aesthetics impacts has been defined to “*include impacts on public and private views and on the historic character of the project site and surrounding area.*” (See *Save Our Capitol! V. Department of General Services* (2023) 87 Cal. App.5th 655, 675-676.) All aspects of CEQA must be broadly and liberally construed. An artificially limited consideration of the possibility of impacts defeats the purposes of CEQA to minimize the adverse impacts of physical changes to the environment.

Here, there are two additional key factors regarding aesthetics First, the facts are undisputable that the building is located on a City designated Scenic Corridor. There is nothing in CEQA that would distinguish a significant adverse impact which is the certain effect of the removal of a building that was formally established as aesthetically important from an established scenic corridor and one on a state highway. Any effort to make this distinction is irrational, indefensible and inconsistent with the purposes and stated requirements of CEQA. Second, the historical relationship between the historically and culturally significant Barry Building and the historically and culturally significant creation of the corral trees on San Vicente create a much larger aesthetic consideration.

Appendix G, Aesthetics, subsection c. states: “If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?”

If the conclusion regarding the conflict with the threshold of significance stated in subsection b was not obvious to the preparer of the DEIR, then Subsection c, drives this point home conclusively. Subsection c deliberately creates a classification of aesthetic impacts that do not arise in nature but occur in the urbanized setting. This inclusion demonstrates that CEQA is not concerned only with aesthetic impacts that occur only in a rural or natural setting.

The DEIR disregards the substantial evidence that the removal of an architecturally significant building located on a Scenic Corridor that is spelled out in a specific plan created under the Government Code is a significant impact that must be acknowledged and mitigated to the extent feasible.

As spelled out in another section regarding significant land use impacts based on “conflicts” that word has independent meaning and under CEQA, the analysis must be objective, made in good faith and cannot be satisfied by the Tables 4.I-1 through 4.I-5 and a statement that

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these table “. . . demonstrate the Project’s consistency with applicable policies governing scenic quality.” The same arguments regarding “consistency” and “conflicts” applies equally here.

The finding in the DEIR that the impact is: Less Than Significant Impact is incorrect, it does not comply with CEQA and it is not supported by substantial evidence.

CEQA case law has established that a project's visual impact on a officially designated historical properties is an appropriate aesthetic impact that requires review under CEQA. It also is established in case law that this separate requirement undermines the separate scheme for CEQA review of environmental impacts on historical resources. (See Pub. Resources Code, § 21084.1; CEQA Guidelines, § 15064.5, subds. (a), (b).) Those rules focus on direct physical changes to historical resources themselves that materially impair those resources' historical significance, not a project's aesthetic impact on its historical setting. (See *Eureka, supra*, 147 Cal.App.4th at pp. 374–375.)

Support for this conclusion is found because the Legislature expressly provided that CEQA addresses projects' aesthetic and historic environmental impacts (Pub. Resources Code, § 21001, subd. (b)), specified that any objects of historical or aesthetic significance are part of the environment (*id.*, § 21060.5), and intended that CEQA be liberally construed to afford the fullest possible protection to the environment (*Laurel Heights Improvement Assn. v. Regents of University of California* (1988) 47 Cal.3d 376, 390).

IMPROPER ANALYSIS AND CONCLUSIONS REGARDING POTENTIAL ADVERSE IMPACTS ON BIOLOGICAL RESOURCES

The Initial Study made the unsupported conclusion regarding subsection (a) of the potential thresholds of significance for Biological Resources as follows:

No Impact. The Project Site is located in an urbanized area and is currently developed with a commercial building and an associated surface parking lot. Landscaping is limited with four onsite palms and several raised bed planters. Due to the developed nature of the Site, and lack of any natural open spaces, species likely to occur on-site are limited to small terrestrial animals. Therefore the Project would not have a substantial adverse effect, either directly or through habitat modifications on any species identified as a candidate, sensitive, or special status species identified in local plans, policies, regulations, by the California Department of Fish and Wildlife (CDFW), the California Native Plant Society (CNPS), or the U.S. Fish and Wildlife Service (USFWS). Therefore, no impact would occur and no further analysis of this topic in the EIR is required.

There is no demonstrated expertise or indeed any evidence to support this conclusion. However, there is substantial evidence to support a fair argument that this conclusion is incorrect.

The undersigned has been collecting cycads for approximately 25 years. The undersigned owns and is currently cultivating more than 40 different species of cycas. The undersigned possess sufficient expertise to state that the photographs of the courtyard depict at least two different and unidentified species of cycas. Because little emphasis was placed on the plants

James Harris
City of Los Angeles, Department of City Planning
221 N. Figueroa Street, Suite 1350
Los Angeles, CA 90012
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growing in the courtyard in the decision regarding the subject matter of the photographs, it is impossible to identify the exact species or determine whether there exist more than the 2 different species at the site. The removal of these plants has the potential to cause a substantial impact on *species identified as a candidate, sensitive, or special status species* as contemplated by CEQA.

The periodical, the *Annals of Botany*,
(<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4242375/>) states:

Cycads represent a very primitive group of vascular plants that have been in existence for more than 200 million years (Hendricks, 1987). Their origins can be dated to the low Permian (Zhifeng and Thomas, 1989), they were most diverse and widely dispersed in the Mesozoic era, and they were important components in the vegetation of the Triassic and Jurassic. Since then, they have been in decline and today they have only a relict distribution in tropical and subtropical regions. Field studies have shown that the majority of wild cycad populations are either threatened, critically endangered, or on the brink of extinction (Osborne, 1995). All species of cycads have been listed in the Convention on International Trade in Endangered Species of Wild Fauna and Flora.

Plants rarely make it to the list. Consequently, many plant species are rapidly disappearing, largely under the radar of public attention. Some scientists have dedicated their lives to studying plants, including ancient, rare ones that are quickly heading towards extinction. Nathalie Nagalingum, currently an Associate Curator and McAllister Chair of Botany at the California Academy of Sciences in San Francisco, is one of them.

Most of Nagalingum's recent research focuses on cycads, palm-like plants with stout trunks and a crown of lush, stiff leaves. Cycads are believed to be the world's oldest seed bearing plants, some dating back almost 300 million years. This makes them as old (or even older) than dinosaurs, according to Nagalingum.

This ancient group of plants is also heavily sought after by collectors, frequently falling prey to poachers. In 2014, for instance, [thieves reportedly stole 24 cycads](#) — 22 of which are listed as critically endangered on the IUCN Red list — from the Kirstenbosch National Botanical Garden in Cape Town, South Africa.

Cycads are also threatened by deforestation and clearing of land for agriculture or urban sprawl. In fact, of the 300-odd recognized species of cycads today, about two-thirds are seriously threatened by extinction, she said. Many cycad species have now been reduced to a handful of specimens in botanic gardens.

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Nathalie Nagalingum:

I started my career as a paleobotanist (a botanist who studies fossil plants), and several years later became fascinated with cycads because they are ancient plants that co-existed with dinosaurs. In fact they are the oldest seed-plant group that exist today; on the other hand, many of their seed-bearing cousins became extinct. Cycads have been on earth for hundreds of millions of years. . . most cycads are very rare, and two-thirds are officially listed on the IUCN Red List of Threatened Species. A few species are so rare that they are now designated as “extinct in the wild”; this means that they are only known from plants growing in botanic gardens and collections. Cycads are more endangered than any other group of plants or animals on Earth. One of the threats is from deforestation and land clearing. While in the field collecting cycads for my research, I’ve witnessed first-hand the destruction of cycads for urban development, and I have also searched fruitlessly for cycads in areas that have been transformed into agricultural land. The other major threat is from poaching—cycads grow really slowly, so rather than waiting for a seed to grow, older mature plants are stolen for gardens. These two threats, combined with their biology, have made cycads highly endangered.

The history of the use of the subject property supports the need for further inquiry o this topic. As described above, decades ago a tenant was a purveyor of rare plants including palms and other similar plants. It is possible that the plants that are observable in the photos provided in the DEIR, and perhaps others that are not shown, include rare and or endangered and protected species of cycads.

At a minimum, this issue requires further evaluation from an expert with knowledge of cycas to inform the public and the decisions makers or any impact on these plants all of which have been listed in the Convention on International Trade in Endangered Species of Wild Fauna and Flora.

CITY CANNOT LAWFULLY ADOPT A STATEMENT OF OVERRIDING CONSIDERATIONS FOR THE CURRENT PROJECT

CEQA provides a means for the local agency to choose to disregard the identified adverse impacts on the environment, provided there is ample evidence to demonstrate why the social, economic, legal, technical, or other beneficial aspects of the proposed project outweigh the unavoidable adverse environmental impacts and why the Lead Agency is willing to accept such impacts. However, that procedure is not lawfully available in this case for at least the following reasons:

The currently proposed demolition of the Barry Building is demonstrably the last step in the deliberate and calculated pattern of removal of several buildings (described herein) from several adjacent parcels intended to constitute an assemblage of parcels (“Assemblage”) for the purpose of creating one very large empty piece of property. None of these steps have undergone

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City of Los Angeles, Department of City Planning
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any environmental review, despite the obvious relationship to one another measured by ownership and a future (undisclosed) plan. Given the facts showing these relationships, CEQA required early disclosure of this foreseeable plan which did not occur.

For the same reason it's too late to challenge this pattern under CEQA, it's also too late to overlay a statement of overriding considerations on this sequence of events, the last step of which is removal of the Barry Building. The proverbial horse is already out of the barn. The opportunity to ask for that or grant that was legally waived by the choice to proceed in this manner. If not legally waived, then as a matter of policy, City should not reward or forgive the developers by accepting the conclusion of this pattern as somehow beneficial to the citizens of this City;

The limited subject matter for this Draft Environmental Impact Report (DEIR") is the proposed demolition of the Barry Building, only. Accepting the fiction the application to demolish plus fencing and a minimal landscaping buffer from the sidewalk by City and the public alike, must be done in responding to the DEIR because that is all that is presented and pending. Although it is clearly a fiction, it is the only actual project for CEQA purposes currently presented by the developer ("Current Project.") An important part of the Current Project is the legally inherent, or reasonably inferable statement, that the developer cannot foresee anything about the nature of future development, that is the replacement of the Barry Building.

Except that the history of the Assemblage demonstrates the replacement consists of a very significant period of time the site will remain as a vacant lot. The City cannot lawfully adopt a statement of overriding considerations for the elimination of any matter that has been infused with public importance by the City's adoption of the building as historically and culturally significant without one word of replacement. Such an exchange cannot legally support a statement of overriding considerations.

If the ultimate project, that is the re-development of the Assemblage (the "Ultimate Project"), is not currently foreseeable, which would be entirely legal and reasonable if it were true, and therefore the time is not ripe for the disclosure of those future intentions for the Assemblage, then by presenting the Current Project without one word about the future, the developer has waived a choice that was available: use tiering as the method to disclose all known aspects of the future project or wait until the project was ripe for presentation and comment by the public. These facts support a denial of the demolition application and rejection of the DEIR as inadequate on the basis it is premature.

The record of the prior presentation of the Green Hollow Project refutes the inference that the developer has no information relevant to the environmental impacts of the Ultimate Project. Supporting that history is the developer's eschewing the means provided by CEQA to meet its objectives to provide the public and the decision makers with relevant information as soon as reasonably possible.

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The record in this case supports a reasonable finding that as part of a strategy to maximize its advantages at the expense of the public's rights, the developer is deliberately withholding known and material information regarding the future plans to develop the Ultimate Project. The primary legislative purpose of CEQA is full disclosure. Secrecy is antithetical to its function in the decision-making process. The ten-year long history of incremental clearing of the Assemblage and advancing the Undisclosed Project without presenting any piece of it, not to mention the whole of the scope of the demolition, shows a long, very deliberate, and intentional strategy. The law does sanction such an approach to real estate development.

The owners of this property are very sophisticated in the matters of real estate development. Furthermore, the DEIR contains materials prepared by and at the request of a very sophisticated law firm. These facts support the finding that the developer has not been acting in good faith to meet the requirements of environmental disclosure, consideration, and mitigation.

It is patently unfair to the public and the decision makers to unalterably change the physical circumstances involving City's past commitment to the Barry Building, plus other directly related similar historically and culturally significant commitments (described herein) without providing adequate information of what the City and public will receive in its place.

This too constitutes legal grounds which prohibit the City from accepting the developer's Current Project, ratifying the Undisclosed Project, and prejudicing the public and the decision makers regarding the Ultimate Project. It also provides a sound policy reason to simply deny the application and reject the DEIR as inadequate for all of the reasons stated herein.

Very truly yours,


Corin L. Kahn

ATTACHMENT
A

642 and 644 S Saltair Ave

Before demolition, July 2009

(Source: Google Streetview, July 2009)



642 and 644 S Saltair Ave
After demolition, May 2015
(Source: Google Streetview, May 2015)

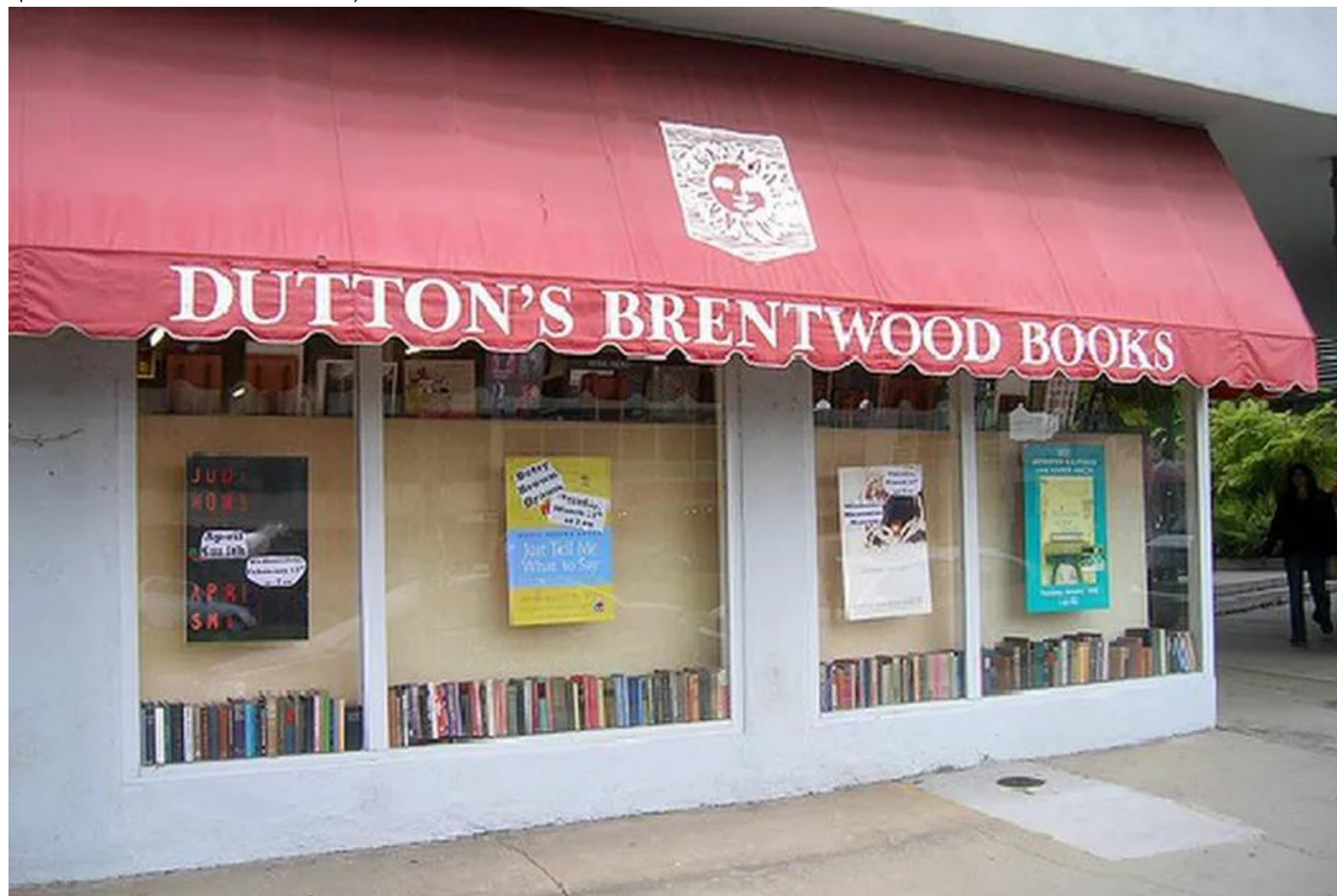


1965 - Brentwood Books
(Source: Movie "Sylvia")



Dutton's Brentwood Books, March 2008

(Source: Racked LA)



Former Del Mano Gallery and Trellis Florist at 11977 San Vicente Blvd.

(Source: Google Streetview, July 2009)



11977 San Vicente Blvd. after demolition of Del Mano Gallery and Trellis Florist
(Source: Google Streetview, October 2014)



Bonner School at 11991 San Vicente Blvd.

(Source: Google Streetview, July 2009)



11991 San Vicente Blvd. after demolition of the Bonner School
(Source: Google Streetview, October 2014)



**ATTACHMENT
B**

Table of Assembly of Property Parcels

Ref #	Parcel (AIN)#	Address	Ownership	Sale Date	Demo Permit #	Demo Date (Finaled)
1	4404-025-008	11973 San Vicente Blvd	11973 San Vicente, LLC Charles T Munger; William Harold Borthwick (Mangers/Members)	12/26/2006, Owner Transfer: 4/20/2017, Quit Claim	19019-10000-04750 & 19019-10000-05593	NOT FINALED, Under CEQA/EIR (Barry Building)
2	4404-025-009	11977 San Vicente Blvd	11973 San Vicente, LLC Charles T Munger; William Harold Borthwick (Mangers/Members)	12/26/2006 (Owner Transfer: 4/20/2017 Quit Claim)	13019-30000-02218 & 13019-30000-02219	3/10/2016 (Issued on 02/13/2014)
3	4404-025-010	11991 San Vicente Blvd	11991 San Vicente, LLC Charles T Munger; William Harold Borthwick (Mangers/Members)	10/20/2006, Owner Transfer: 4/20/2017, Quit Claim	13019-30000-02220 & 13019-30000-02221	05/19/2017 (Issued on 2/13/2014)
4	4404-025-015	No Address	11973 San Vicente, LLC Charles T Munger; William Harold Borthwick (Mangers/Members)	12/26/2006 (Owner Transfer: 4/20/2017 Quit Claim)	N/A: No Structure	N/A: No Structure
5	4404-025-016	No Address	11973 San Vicente, LLC Charles T Munger; William Harold Borthwick (Mangers/Members)	12/26/2006, Owner Transfer: 4/20/2017, Quit Claim	N/A: No Structure	N/A: No Structure

Table of Assembly of Property Parcels

Ref #	Parcel (AIN)#	Address	Ownership	Purchase Date	Demo Permit #	Demo Date (Finaled)
6	4404-025-027	644 S Saltair Ave	11991 San Vicente, LLC Charles T Munger; William Harold Borthwick (Mangers/Members)	6/09/1989, Owner Transfer: 04/20/2017 Quit Claim	13019-30000-02217	8/26/2014
7	4404-025-028	642 S Saltair Ave	11991 San Vicente, LLC Charles T Munger; William Harold Borthwick (Mangers/Members)	10/24/1989, Owner Transfer: 04/20/2017 Quit Claim	13019-30000-02208	8/26/2014
8	4404-026-008	11901 Saltair Terrace	11991 San Vicente, LLC Charles T Munger; William Harold Borthwick (Mangers/Members)		07019-30000-00349	3/29/2007

Parcel Map
Showing Parcels owned by
Applicant

4404

25

SHEET

P.A.
1696-25

TRA
67

REVISED
10-2-59
10-5-61

12-8-61
12-14-62
670310

680313
721109
830603305-84

2018

PG
26

Ref # 8

parcel #: 4404-26-008

MAPPING AND GIS
SERVICES
SCALE 1" = 80'

MOST S COR TR NO 13063

Ref # 4

Ref # 5

Ref # 7

Ref # 6

Ref # 3

Ref # 2

Ref # 1

PG
23

SALTAIR

SAN VICENTE

SE LINE OF
TR NO 12538

PG
27

B
42

Statement of Information

from

California Secretary of State

for

11973 San Vicente, LLC

And

11991 San Vicente, LLC



Secretary of State
Statement of Information
(Limited Liability Company)

LLC-12

18-A43284

FILED

In the office of the Secretary of State
of the State of California

FEB 01, 2018

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IMPORTANT — [Read instructions](#) before completing this form.

Filing Fee – \$20.00

Copy Fees – First page \$1.00; each attachment page \$0.50;
Certification Fee - \$5.00 plus copy fees

1. Limited Liability Company Name (Enter the exact name of the LLC. If you registered in California using an alternate name, [see instructions](#).)

11973 SAN VICENTE, LLC

2. 12-Digit Secretary of State File Number

201704010474

3. State, Foreign Country or Place of Organization (only if formed outside of California)

CALIFORNIA

4. Business Addresses

a. Street Address of Principal Office - Do not list a P.O. Box	City (no abbreviations)	State	Zip Code
300 S. Grand Avenue, 37th floor	Los Angeles	CA	90071
b. Mailing Address of LLC, if different than item 4a	City (no abbreviations)	State	Zip Code
300 S. Grand Avenue, 37th floor	Los Angeles	CA	90071
c. Street Address of California Office, if Item 4a is not in California - Do not list a P.O. Box	City (no abbreviations)	State	Zip Code
300 S. Grand Avenue, 37th floor	Los Angeles	CA	90071

5. Manager(s) or Member(s)

If no **managers** have been appointed or elected, provide the name and address of each **member**. At least one name **and** address must be listed. If the manager/member is an individual, complete Items 5a and 5c (leave Item 5b blank). If the manager/member is an entity, complete Items 5b and 5c (leave Item 5a blank). Note: The LLC cannot serve as its own manager or member. If the LLC has additional managers/members, enter the name(s) and addresses on Form LLC-12A ([see instructions](#)).

a. First Name, if an individual - Do not complete Item 5b	Middle Name	Last Name	Suffix
Charles	T.	Munger	
b. Entity Name - Do not complete Item 5a			
c. Address	City (no abbreviations)	State	Zip Code
300 S. Grand Avenue, 37th floor	Los Angeles	CA	90071

6. Service of Process (Must provide either Individual **OR** Corporation.)

INDIVIDUAL – Complete Items 6a and 6b only. Must include agent's full name and California street address.

a. California Agent's First Name (if agent is not a corporation)	Middle Name	Last Name	Suffix
William	Harold	Borthwick	
b. Street Address (if agent is not a corporation) - Do not enter a P.O. Box	City (no abbreviations)	State	Zip Code
300 S. Grand Avenue, 37th floor	Los Angeles	CA	90071

CORPORATION – Complete Item 6c only. Only include the name of the registered agent Corporation.

c. California Registered Corporate Agent's Name (if agent is a corporation) – Do not complete Item 6a or 6b

7. Type of Business

a. Describe the type of business or services of the Limited Liability Company

Real Estate Ownership and Management

8. Chief Executive Officer, if elected or appointed

a. First Name	Middle Name	Last Name	Suffix
b. Address	City (no abbreviations)	State	Zip Code

9. The Information contained herein, including any attachments, is true and correct.

02/01/2018

Date

William Harold Borthwick

Type or Print Name of Person Completing the Form

Manager

Title

Signature

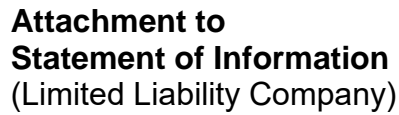
Return Address (Optional) (For communication from the Secretary of State related to this document, or if purchasing a copy of the filed document enter the name of a person or company and the mailing address. This information will become public when filed. [SEE INSTRUCTIONS](#) BEFORE COMPLETING.)

Name: []

Company:

Address:

City/State/Zip: []



18-A43284

11973 SAN VICENTE, LLC

B. 12-Digit Secretary of State File Number

201704010474

C. State or Place of Organization (only if formed outside of California)

CALIFORNIA

[illegible]





Secretary of State
Statement of Information
(Limited Liability Company)

LLC-12

18-A43332

FILED

In the office of the Secretary of State
of the State of California

FEB 01, 2018

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Certification Fee - \$5.00 plus copy fees

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1. Limited Liability Company Name (Enter the exact name of the LLC. If you registered in California using an alternate name, [see instructions](#).)

11991 SAN VICENTE, LLC

2. 12-Digit Secretary of State File Number
201706110616

3. State, Foreign Country or Place of Organization (only if formed outside of California)
CALIFORNIA

4. Business Addresses

a. Street Address of Principal Office - Do not list a P.O. Box 300 S. Grand Avenue, 37th floor	City (no abbreviations) Los Angeles	State CA	Zip Code 90071
b. Mailing Address of LLC, if different than item 4a 300 S. Grand Avenue, 37th floor	City (no abbreviations) Los Angeles	State CA	Zip Code 90071
c. Street Address of California Office, if Item 4a is not in California - Do not list a P.O. Box 300 S. Grand Avenue, 37th floor	City (no abbreviations) Los Angeles	State CA	Zip Code 90071

If no **managers** have been appointed or elected, provide the name and address of each **member**. At least one name **and** address must be listed. If the manager/member is an individual, complete Items 5a and 5c (leave Item 5b blank). If the manager/member is an entity, complete Items 5b and 5c (leave Item 5a blank). Note: The LLC cannot serve as its own manager or member. If the LLC has additional managers/members, enter the name(s) and addresses on Form LLC-12A ([see instructions](#)).

5. Manager(s) or Member(s)

a. First Name, if an individual - Do not complete Item 5b Charles	Middle Name T.	Last Name Munger	Suffix
b. Entity Name - Do not complete Item 5a			
c. Address 300 S. Grand Avenue, 37th floor	City (no abbreviations) Los Angeles	State CA	Zip Code 90071

6. Service of Process (Must provide either Individual **OR** Corporation.)

INDIVIDUAL – Complete Items 6a and 6b only. Must include agent's full name and California street address.

a. California Agent's First Name (if agent is not a corporation) William	Middle Name Harold	Last Name Borthwick	Suffix
b. Street Address (if agent is not a corporation) - Do not enter a P.O. Box 300 S. Grand Avenue, 37th floor	City (no abbreviations) Los Angeles	State CA	Zip Code 90071

CORPORATION – Complete Item 6c only. Only include the name of the registered agent Corporation.

c. California Registered Corporate Agent's Name (if agent is a corporation) – Do not complete Item 6a or 6b

7. Type of Business

a. Describe the type of business or services of the Limited Liability Company
Real Estate Ownership and Management

8. Chief Executive Officer, if elected or appointed

a. First Name	Middle Name	Last Name	Suffix
b. Address			
City (no abbreviations)		State	Zip Code

9. The Information contained herein, including any attachments, is true and correct.

02/01/2018

William Harold Borthwick

Manager

Date

Type or Print Name of Person Completing the Form

Title

Signature

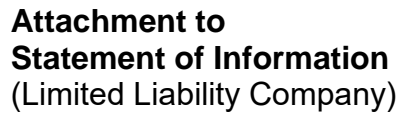
Return Address (Optional) (For communication from the Secretary of State related to this document, or if purchasing a copy of the filed document enter the name of a person or company and the mailing address. This information will become public when filed. [SEE INSTRUCTIONS](#) BEFORE COMPLETING.)

Name: []

Company:

Address:

City/State/Zip: []



18-A43332

11991 SAN VICENTE, LLC

B. 12-Digit Secretary of State File Number

201706110616

C. State or Place of Organization (only if formed outside of California)

CALIFORNIA

[illegible]



Property Detail Report showing

Property Ownership Information

(See Ref. # in table for association
with APN in Report)

Property Detail Report

For Property Located At :

**11973 SAN VICENTE BLVD, LOS ANGELES, CA
90049-5098**


RealQuest

Owner Information

Bldg Card: 000 of 002

Owner Name:

11973 SAN VICENTE LLC

Mailing Address:

PO BOX 55007, LOS ANGELES CA 90055-2007 B900 C/O CHARLES T MUNGER

Vesting Codes:

//

Location Information

Legal Description:

WESTGATE ACRES SW 83.5 FT OF LOT 51 AND NE 50 FT OF LOT 52

County:

LOS ANGELES, CA

Census Tract / Block:

2640.00 / 2

Township-Range-Sect:

Legal Book/Page:

134-96

Legal Lot:

52

Legal Block:

Market Area:

C06

Neighbor Code:

APN:

4404-025-008

Alternate APN:

Subdivision:

WESTGATE ACRES

Map Reference:

41-C3 /

Tract#:

School District:

LOS ANGELES

School District Name:

LOS ANGELES

Munic/Township:

LOS ANGELES

Owner Transfer Information

Recording/Sale Date:

04/27/2017 / 04/20/2017

Sale Price:

Document#:

467331

Deed Type:

QUIT CLAIM DEED

1st Mtg Document#:

Last Market Sale Information

Recording/Sale Date:

01/11/2007 / 12/26/2006

Sale Price:

\$14,443,500

Sale Type:

FULL

Document#:

60468

Deed Type:

GRANT DEED

Transfer Document#:

New Construction:

Title Company:

CHICAGO TITLE CO

Lender:

Seller Name:

BARRY FAMILY TRUST

1st Mtg Amount/Type:

/

1st Mtg Int. Rate/Type:

/

1st Mtg Document#:

2nd Mtg Amount/Type:

/

2nd Mtg Int. Rate/Type:

/

Price Per SqFt:

\$602.29

Multi/Split Sale:

MULTIPLE

Prior Sale Information

Prior Rec/Sale Date:

/

Prior Sale Price:

Prior Doc Number:

Prior Deed Type:

Prior Lender:

Prior 1st Mtg Amt/Type:

/

Prior 1st Mtg Rate/Type:

/

Property Characteristics

Year Built / Eff:

1951 /

Gross Area:

23,981

Building Area:

23,981

Tot Adj Area:

Above Grade:

of Stories:

Other Improvements:

Total Rooms/Offices

Total Restrooms:

2

Roof Type:

Roof Material:

Construction:

Foundation:

Exterior wall:

Basement Area:

Garage Area:

Garage Capacity:

Parking Spaces:

Heat Type:

Air Cond:

NONE

Pool:

Quality:

Condition:

Site Information

Zoning:

LAC4

Lot Area:

26,586

Land Use:

STORES & OFFICES

Site Influence:

Acres:

0.61

Lot Width/Depth:

x

Res/Comm Units:

33 / 32

County Use:

STORE & OFFICE (1200)

State Use:

Water Type:

Sewer Type:

Tax Information

Total Value:

\$5,167,163

Land Value:

\$4,442,799

Improvement Value:

\$724,364

Total Taxable Value:

\$5,167,163

Assessed Year:

2022

Improved %:

14%

Tax Year:

2022

Property Tax:

\$62,272.85

Tax Area:

67

Tax Exemption:

Property Detail Report

For Property Located At :

**11977 SAN VICENTE BLVD, LOS ANGELES, CA
90049-5003**


RealQuest

Owner Information

Owner Name: 11973 SAN VICENTE LLC
Mailing Address: PO BOX 55007, LOS ANGELES CA 90055-2007 B900 C/O CHARLES T MUNGER
Vesting Codes: //

Location Information

Legal Description: WESTGATE ACRES SW 50 FT OF LOT 52
County: LOS ANGELES, CA **APN:** 4404-025-009
Census Tract / Block: 2640.00 / 2 **Alternate APN:**
Township-Range-Sect: **Subdivision:** WESTGATE ACRES
Legal Book/Page: 134-96 **Map Reference:** 41-B3 /
Legal Lot: 52 **Tract#:**
Legal Block: **School District:** LOS ANGELES
Market Area: C06 **School District Name:** LOS ANGELES
Neighbor Code: **Munic/Township:** LOS ANGELES

Owner Transfer Information

Recording/Sale Date: 04/27/2017 / 04/20/2017 **Deed Type:** QUIT CLAIM DEED
Sale Price: **1st Mtg Document#:**
Document#: 467331

Last Market Sale Information

Recording/Sale Date: 01/11/2007 / 12/26/2006 **1st Mtg Amount/Type:** /
Sale Price: \$14,443,500 **1st Mtg Int. Rate/Type:** /
Sale Type: FULL **1st Mtg Document #:**
Document#: 60468 **2nd Mtg Amount/Type:** /
Deed Type: GRANT DEED **2nd Mtg Int. Rate/Type:** /
Transfer Document#: **Price Per SqFt:**
New Construction: **Multi/Split Sale:** MULTI
Title Company: CHICAGO TITLE CO
Lender:
Seller Name: BARRY FAMILY TRUST

Prior Sale Information

Prior Rec/Sale Date: / **Prior Lender:**
Prior Sale Price: **Prior 1st Mtg Amt/Type:** /
Prior Doc Number: **Prior 1st Mtg Rate/Type:** /
Prior Deed Type:

Property Characteristics

Year Built / Eff: / **Total Rooms/Offices:** **Garage Area:**
Gross Area: **Total Restrooms:** **Garage Capacity:**
Building Area: **Roof Type:** **Parking Spaces:**
Tot Adj Area: **Roof Material:** **Heat Type:**
Above Grade: **Construction:** **Air Cond:**
of Stories: **Foundation:** **Pool:**
Other Improvements: **Exterior wall:** **Quality:**
Basement Area: **Condition:**

Site Information

Zoning: LAC4 **Acres:** 0.23 **County Use:** VACANT RESIDENTIAL (010V)
Lot Area: 9,986 **Lot Width/Depth:** x
Land Use: COMMERCIAL (NEC) **Res/Comm Units:** / **State Use:**
Site Influence: **Water Type:**
Sewer Type:

Tax Information

Total Value: \$2,933,089 **Assessed Year:** 2022 **Property Tax:** \$34,235.18
Land Value: \$2,933,089 **Improved %:** **Tax Area:** 67
Improvement Value: **Tax Year:** 2022 **Tax Exemption:**
Total Taxable Value: \$2,933,089

Property Detail Report

For Property Located At :

11991 SAN VICENTE BLVD, LOS ANGELES, CA
90049-5003



RealQuest

Owner Information

Owner Name:

11991 SAN VICENTE LLC

Mailing Address:

PO BOX 55007, LOS ANGELES CA 90055-2007 B900 C/O CHARLES T MUNGER

Vesting Codes:

//

Location Information

Legal Description:

WESTGATE ACRES LOT 53 AND LOT COM AT MOST E COR OF LOT 54 TH S 76 43' W 0.33 FT TH
 NW TO NW LINE OF SD LOT TH NE THEREON 1.17 FT TO MOST N COR OF SD LOT TH SE 200 FT
 TO BEG PART OF LOT 54

County:

LOS ANGELES, CA

APN:

4404-025-010

Census Tract / Block:

2640.00/2

Alternate APN:

Township-Range-Sect:

Subdivision:

WESTGATE ACRES

Legal Book/Page:

134-96

Map Reference:

41-B3/

Legal Lot:

54

Tract#:

Legal Block:

School District:

LOS ANGELES

Market Area:

C06

School District Name:

LOS ANGELES

Neighbor Code:

Munic/Township:

LOS ANGELES

Owner Transfer Information

Recording/Sale Date:

04/27/2017/04/20/2017

Deed Type:

QUIT CLAIM DEED

Sale Price:

1st Mtg Document#:

Document#:

467330

Last Market Sale Information

Recording/Sale Date:

11/17/2006 / 10/20/2006

1st Mtg Amount/Type:

/

Sale Price:

\$10,576,000

1st Mtg Int. Rate/Type:

/

Sale Type:

UNKNOWN

1st Mtg Document#:

Document#:

2554850

2nd Mtg Amount/Type:

/

Deed Type:

GRANT DEED

2nd Mtg Int. Rate/Type:

/

Transfer Document #:

Price Per SqFt:

New Construction:

Multi/Split Sale:

Title Company:

CHICAGO TITLE CO

Lender:

Seller Name:

BONNER RICHARD 1998 TRUST

Prior Sale Information

Prior Rec/Sale Date:

/

Prior Lender:

Prior Sale Price:

Prior 1st Mtg Amt/Type:

/

Prior Doc Number:

Prior 1st Mtg Rate/Type:

/

Prior Deed Type:

Property Characteristics

Year Built / Eff:

/

Total Rooms/Offices

Garage Area:

Gross Area:

Total Restrooms:

Garage Capacity:

Building Area:

Roof Type:

Parking Spaces:

Tot Adj Area:

Roof Material:

Heat Type:

Above Grade:

Construction:

Air Cond:

of Stories:

Foundation:

Pool:

Other Improvements:

Exterior wall:

Quality:

Basement Area:

Condition:

Site Information

Zoning:

LAC4

Acres:

0.47

County Use:

VACANT RESIDENTIAL
(010V)

Lot Area:

20,421

Lot Width/Depth:

x

State Use:

Land Use:

COMMERCIAL (NEC) Res/Comm Units:

/

Water Type:

Site Influence:

Sewer Type:

Tax Information

Total Value:

\$6,145,068

Assessed Year:

2022

Property Tax

\$71,666.62

Land Value:

\$6,145,068

Improved %:

Tax Area:

67

Improvement Value:

Tax Year:

2022

Tax Exemption:

Total Taxable Value: \$6,145,068

Property Detail Report

For Property Located At :
,,CA



RealQuest

Owner Information

Owner Name: 11973 SAN VICENTE LLC
Mailing Address: PO BOX 55007, LOS ANGELES CA 90055-2007 B900 C/O CHARLES T MUNGER
Vesting Codes: //

Location Information

Legal Description: WESTGATE ACRES LOT COM N 76 43' E 206.87 FT FROM MOSTS COR OF LOT 56 TH N 76 43' E 50 FT WITH A UNIFORM DEPTH OF 100 FT N 15 15' W PART OF LOT 56
County: LOS ANGELES, CA **APN:** 4404-025-015
Census Tract / Block: 2640.00 / 2 **Alternate APN:**
Township-Range-Sect: **Subdivision:** WESTGATE ACRES
Legal Book/Page: 134-96 **Map Reference:** 41-C3 /
Legal Lot: 56 **Tract#:**
Legal Block: **School District:** LOS ANGELES
Market Area: C06 **School District Name:** LOS ANGELES
Neighbor Code: **Munic/Township:** LOS ANGELES

Owner Transfer Information

Recording/Sale Date: 04/27/2017/04/20/2017 **Deed Type:** QUIT CLAIM DEED
Sale Price: **1st Mtg Document#:**
Document#: 467331

Last Market Sale Information

Recording/Sale Date: 01/11/2007 / 12/26/2006 **1st Mtg Amount/Type:** /
Sale Price: \$14,443,500 **1st Mtg Int. Rate/Type:** /
Sale Type: FULL **1st Mtg Document#:**
Document#: 60468 **2nd Mtg Amount/Type:** /
Deed Type: GRANT DEED **2nd Mtg Int. Rate/Type:** /
Transfer Document #: **Price Per SqFt:** \$2,888.70
New Construction: **Multi/Split Sale:** MULTI
Title Company: CHICAGO TITLE CO
Lender:
Seller Name: BARRY FAMILY TRUST

Prior Sale Information

Prior Rec/Sale Date: / **Prior Lender:**
Prior Sale Price: **Prior 1st Mtg Amt/Type:** /
Prior Doc Number: **Prior 1st Mtg Rate/Type:** /
Prior Deed Type:

Property Characteristics

Year Built / Eff: 1948 / 1980 **Total Rooms/Offices:** **Garage Area:**
Gross Area: 5,000 **Total Restrooms:** **Garage Capacity:**
Building Area: 5,000 **Roof Type:** **Parking Spaces:**
Tot Adj Area: **Roof Material:** **Heat Type:**
Above Grade: **Construction:** **Air Cond:**
of Stories: **Foundation:** **Pool:**
Other Improvements: **Exterior wall:** **Quality:**
Basement Area: **Condition:**

Site Information

Zoning: LAP **Acres:** 0.11 **County Use:** PARKING LOT (2700)
Lot Area: 5,003 **Lot Width/Depth:** 50 x 100 **State Use:**
Land Use: PARKING LOT **Res/Comm Units:** / **Water Type:**
Site Influence: **Sewer Type:**

Tax Information

Total Value: \$1,340,075 **Assessed Year:** 2022 **Property Tax:** \$15,845.11
Land Value: \$1,334,043 **Improved%:** **Tax Area:** 67
Improvement Value: \$6,032 **Tax Year:** 2022 **Tax Exemption:**
Total Taxable Value: \$1,340,075

Property Detail Report

For Property Located At :
,, CA



RealQuest

Owner Information

Owner Name: 11973 SAN VICENTE LLC
Mailing Address: PO BOX 55007, LOS ANGELES CA 90055-2007 B900 C/O CHARLES T MUNGER
Vesting Codes: //

Location Information

Legal Description: WESTGATE ACRES LOT COM N 76 43' E 256.87 FT FROM MOST S COR OF LOT 56 TH N 76 43' E 133.50 FT WITH A UNIFORM DEPTH OF 100 FTTH N 1515'WPARTOF LOT56
County: LOS ANGELES, CA **APN:** 4404-025-016
Census Tract / Block: 264000 / 2 **Alternate APN:**
Township-Range-Sect: **Subdivision:** WESTGATE ACRES
Legal Book/Page: 134-96 **Map Reference:** 41-C3/
Legal Lot: 56 **Tract#:**
Legal Block: **School District:** LOS ANGELES
Market Area: C06 **School District Name:** LOS ANGELES
Neighbor Code: **Munic/Township:** LOS ANGELES

Owner Transfer Information

Recording/Sale Date: 04/27/2017 / 04/20/2017 **Deed Type:** QUIT CLAIM DEED
Sale Price: **1st Mtg Document#:**
Document#: 467331

Last Market Sale Information

Recording/Sale Date: 01/11/2007 / 12/26/2006 **1st Mtg Amount/Type:** /
Sale Price: \$14,443,500 **1st Mtg Int. Rate/Type:** /
Sale Type: FULL **1st Mtg Document#:** /
Document#: 60468 **2nd Mtg Amount/Type:** /
Deed Type: GRANT DEED **2nd Mtg Int. Rate/Type:** /
Transfer Document#: **Price Per SqFt:** \$1,803.18
New Construction: **Multi/Split Sale:** MULTI
Title Company: CHICAGO TITLE CO
Lender:
Seller Name: BARRY FAMILY TRUST

Prior Sale Information

Prior Rec/Sale Date: / **Prior Lender:**
Prior Sale Price: **Prior 1st Mtg Amt/Type:** /
Prior Doc Number: **Prior 1st Mtg Rate/Type:** /
Prior Deed Type:

Property Characteristics

YearBuilt/Eff: 1951/1951	Total Rooms/Offices	Garage Area:
Gross Area: 8,010	Total Restrooms:	Garage Capacity:
Building Area: 8,010	Roof Type:	Parking Spaces:
Tot Adj Area:	Roof Material:	Heat Type:
Above Grade:	Construction:	Air Cond:
# of Stories:	Foundation:	Pool:
Other Improvements:	Exterior wall:	Quality:
	Basement Area:	Condition:

Site Information

Zoning: LAP	Acres: 0.30	County Use: PARKING LOT (2700)
Lot Area: 13,234	Lot Width/Depth: x	State Use:
Land Use: PARKING LOT	Res/Comm Units: /	Water Type:
Site Influence:		Sewer Type:

Tax Information

Total Value: \$2,439,307	Assessed Year: 2022	Property Tax: \$29,007.03
Land Value: \$2,438,707	Improved%:	Tax Area: 67
Improvement Value: \$600	Tax Year: 2022	Tax Exemption:
Total Taxable Value: \$2,439,307		

Property Detail Report

For Property Located At :

644 S SALT AIR AVE, LOS ANGELES, CA 90049-4138


Real Quest

Owner Information

Owner Name: **11991 SAN VICENTE LLC**
Mailing Address: PO BOX 55007, LOS ANGELES CA 90055-2007 B900 C/O CHARLES T MUNGER
Vesting Codes: //

Location Information

Legal Description: WESTGATE ACRES LOT COM AT SW COR OF LOT 56 TH N 15 15' W TO A LINE PARALLEL WITH AND DIST SE AT R/A 50 FT FROM SE LINE OF TRACT NO 13063 TH NE ON SD PARALLEL LINE TO NW PROLONGATION OF NE BEG PART OF LOT 56

County:	LOS ANGELES, CA	APN:	4404-025-027
Census Tract / Block:	2640.00/2	Alternate APN:	
Township-Range-Sect:		Subdivision:	13063
Legal Book/Page:	134-96	Map Reference:	41-B3 /
Legal Lot:	56	Tract#:	13063
Legal Block:		School District:	LOS ANGELES
Market Area:	C06	School District Name:	LOS ANGELES
Neighbor Code:		Munic/Township:	LOS ANGELES

Owner Transfer Information

Recording/Sale Date:	04/27/2017 / 04/20/2017	Deed Type:	QUIT CLAIM DEED
Sale Price:		1st Mtg Document#:	
Document#:	467330		

Last Market Sale Information

Recording/Sale Date:	06/09/1989/ 06/1989	1st Mtg Amount/Type:	/
Sale Price:	\$900,000	1st Mtg Int. Rate/Type:	/
Sale Type:	FULL	1st Mtg Document#:	
Document#:	935042	2nd Mtg Amount/Type:	/
Deed Type:	GRANT DEED	2nd Mtg Int. Rate/Type:	/
Transfer Document#:		Price Per SqFt:	
New Construction:		Multi/Split Sale:	
Title Company:			
Lender:			
Seller Name:	ZIFF RAYMOND		

Prior Sale Information

Prior Rec/Sale Date:	05/1973 /	Prior Lender:	
Prior Sale Price:	\$77,500	Prior 1st Mtg Amt/Type:	/
Prior Doc Number:		Prior 1st Mtg Rate/Type:	/
Prior Deed Type:	DEED(REG)		

Property Characteristics

Gross Area:		Parking Type:		Construction:	
Living Area:		Garage Area:		Heat Type:	
Tot Adj Area:		Garage Capacity:		Exterior wall:	
Above Grade:		Parking Spaces:		Porch Type:	
Total Rooms:		Basement Area:		Patio Type:	
Bedrooms:		Finish BsmntArea:		Pool:	POOL
Bath(F/H):	/	Basement Type:		Air Cond:	
Year Built / Eff:	/	Roof Type:		Style:	
Fireplace:	/	Foundation:		Quality:	
# of Stories:		Roof Material:		Condition:	
Other Improvements:					

Site Information

Zoning:	LARS	Acres:	0.24	County Use:	SINGLE FAMILY RESID (0101)
Lot Area:	10,387	Lot Width/Depth:	50 x 207	State Use:	
Land Use:	SFR	Res/Comm Units:	/	Water Type:	
Site Influence:				Sewer Type:	TYPE UNKNOWN

Tax Information

Total Value:	\$1,826,201	Assessed Year:	2022	Property Tax:	\$21,591.68
Land Value:	\$1,826,201	Improved %:		Tax Area:	67
Improvement Value:		Tax Year:	2022	Tax Exemption:	
Total Taxable Value:	\$1,826,201				

Property Detail Report

For Property Located At :

642 S SALT AIR AVE, LOS ANGELES, CA 90049-4138


RealQuest

Owner Information

Owner Name: 11991 SAN VICENTE LLC
Mailing Address: PO BOX 55007, LOS ANGELES CA 90055-2007 B900 C/O CHARLES T MUNGER
Vesting Codes: //

Location Information

Legal Description: WESTGATE ACRES LOT COM AT MOSTS COR OF TRACT NO 13063 TH S 15 15' E TO A LINE PARALLEL WITH AND DIST SE AT R/A 50 FT FROM SE LINE OF SD TR TH NE ON SD PARALLEL LINE TO NW PROLONGATION OF NE LOT 56
County: LOS ANGELES, CA **APN:** 4404-025-028
Census Tract / Block: 2640.00 / 2 **Alternate APN:**
Township-Range-Sect: **Subdivision:** 13063
Legal Book/Page: 134-96 **Map Reference:** 41-B3/
Legal Lot: 56 **Tract#:** 13063
Legal Block: **School District:** LOS ANGELES
Market Area: C06 **School District Name:** LOS ANGELES
Neighbor Code: **Munic/Township:** LOS ANGELES

Owner Transfer Information

Recording/Sale Date: 04/27/2017 / 04/20/2017 **Deed Type:** QUIT CLAIM DEED
Sale Price: **1st Mtg Document#:**
Document#: 467330

Last Market Sale Information

Recording/Sale Date: 10/24/1986 / 10/1986 **1st Mtg Amount/Type:** /
Sale Price: \$500,000 **1st Mtg Int. Rate/Type:** /
Sale Type: FULL **1st Mtg Document#:** /
Document#: 1442719 **2nd Mtg Amount/Type:** /
Deed Type: GRANT DEED **2nd Mtg Int. Rate/Type:** /
Transfer Document#: **Price Per SqFt:**
New Construction: **Multi/Split Sale:**
Title Company:
Lender:
Seller Name: ZIFF RAYMOND

Prior Sale Information

Prior Rec/Sale Date: / **Prior Lender:**
Prior Sale Price: **Prior 1st Mtg Amt/Type:** /
Prior Doc Number: **Prior 1st Mtg Rate/Type:** /
Prior Deed Type:

Property Characteristics

Gross Area:	Parking Type:	Construction:
Living Area:	Garage Area:	Heat Type:
Tot Adj Area:	Garage Capacity:	Exterior wall:
Above Grade:	Parking Spaces:	Porch Type:
Total Rooms:	Basement Area:	Patio Type:
Bedrooms:	Finish Bsmnt Area:	Pool: POOL
Bath(F/H): /	Basement Type:	Air Cond:
Year Built / Eff: /	Roof Type:	Style:
Fireplace: /	Foundation:	Quality:
# of Stories:	Roof Material:	Condition:
Other Improvements:		

Site Information

Zoning: LARS	Acres: 0.24	County Use: SINGLE FAMILY RESID (0101)
Lot Area: 10,486	Lot Width/Depth: 50 x 160	State Use:
Land Use: SFR	Res/Comm Units: /	Water Type:
Site Influence: CORNER		Sewer Type: TYPE UNKNOWN

Tax Information

Total Value: \$1,453,059	Assessed Year: 2022	Property Tax: \$17,266.75
Land Value: \$1,453,059	Improved %:	Tax Area: 67
Improvement Value:	Tax Year: 2022	Tax Exemption:
Total Taxable Value: \$1,453,059		

Property Detail Report

For Property Located At :

11901 SALTAIR TER, LOS ANGELES, CA 90049



RealQuest

Owner Information

Owner Name: 11901 SAN VICENTE LLC
Mailing Address: PO BOX 55007, LOS ANGELES CA 90055-2007 B900 C/O CHARLES T MUNGER
Vesting Codes: / /

Location Information

Legal Description: TRACT# 13063 LOT 8
County: LOS ANGELES, CA **APN:** 4404-026-008
Census Tract / Block: 2640.00 / 2 **Alternate APN:**
Township-Range-Sect: **Subdivision:** 13063
Legal Book/Page: 287-34 **Map Reference:** 41-B3 /
Legal Lot: 8 **Tract#:** 13063
Legal Block: **School District:** LOS ANGELES
Market Area: C06 **School District Name:** LOS ANGELES
Neighbor Code: **Munic/Township:** LOS ANGELES

Owner Transfer Information

Recording/Sale Date: 04/27/2017 / 04/20/2017 **Deed Type:** QUIT CLAIM DEED
Sale Price: **1st Mtg Document#:**
Document#: 467330

Last Market Sale Information

Recording/Sale Date: 08/08/2006 / 07/27/2006 **1st Mtg Amount/Type:** /
Sale Price: **1st Mtg Int. Rate/Type:** /
Sale Type: N **1st Mtg Document#:**
Document#: 1753461 **2nd Mtg Amount/Type:** /
Deed Type: GRANT DEED **2nd Mtg Int. Rate/Type:** /
Transfer Document#: **Price Per SqFt:**
New Construction: **Multi/Split Sale:**

Title Company: EQUITY TITLE CO.
Lender:
Seller Name: SIMMONS E & D TRUST

Prior Sale Information

Prior Rec/Sale Date: 07/06/1993 / **Prior Lender:**
Prior Sale Price: **Prior 1st Mtg Amt/Type:** /
Prior Doc Number: 1282728 **Prior 1st Mtg Rate/Type:** /
Prior Deed Type: DEED (REG)

Property Characteristics

Gross Area:	Parking Type:	Construction:
Living Area:	Garage Area:	Heat Type:
Tot Adj Area:	Garage Capacity:	Exterior wall:
Above Grade:	Parking Spaces:	Porch Type:
Total Rooms:	Basement Area:	Patio Type:
Bedrooms:	Finish Bsmnt Area:	Pool:
Bath(F/H): /	Basement Type:	Air Cond:
Year Built / Eff: /	Roof Type:	Style:
Fireplace: /	Foundation:	Quality:
# of Stories:	Roof Material:	Condition:
Other Improvements:		

Site Information

Zoning: LARS	Acres: 0.28	County Use: SINGLE FAMILY RESID (0100)
Lot Area: 12,317	Lot Width/Depth: x	State Use:
Land Use: SFR	Res/Comm Units: /	Water Type:
Site Influence: CUL-DE-SAC		Sewer Type: TYPE UNKNOWN

Tax Information

Total Value: \$2,855,316	Assessed Year: 2022	Property Tax: \$33,400.93
Land Value: \$2,855,316	Improved %:	Tax Area: 67
Improvement Value:	Tax Year: 2022	Tax Exemption:
Total Taxable Value: \$2,855,316		

ATTACHMENT C

Outside Image:

The Barry Building and adjacent business "Trellis Florist" (looking eastbound along San Vicente Boulevard)

Source: Google Streetview, July 2009



East side of Courtyard looking toward San Vicente Blvd

Source: Patch (2012)



The view from the back balcony towards the street side, showing the cantilevered 2nd floor

Source: Laura Clayton Baker (2016)



The view from the 2nd floor balcony across the courtyard

Source: Laura Clayton Baker (2016)



Courtyard Café

Source: Laura Clayton Baker (2016)



Courtyard

Source: Ty Miller (2016)



ATTACHMENT D

Council File: 07-2309



Title

THE BARRY BUILDING / HISTORIC MONUMENT

Subject

Communication from the Cultural Heritage Commission, dated July 17, 2007, relative to the inclusion of The Barry Building, located at 11973 West San Vicente Boulevard, in the list of Historic-Cultural Monuments. CHC 2007-1585-HCM.

Date Received / Introduced

07/18/2007

Last Changed Date

11/06/2007

Council District

11

Initiated by

Cultural Heritage Commission

File History

7-18-07 - For ref
 7-18-07 - Ref to Planning and Land Use Management Committee
 7-18-07 - File to Planning and Land Use Management Committee Clerk
 9-14-07 - Set for Planning and Land Use Management Committee on September 18, 2007
 9-18-07 - Planning and Land Use Management Committee Disposition - Approved
 10-2-07 - Council Action - Planning and Land Use Management Committee Report ADOPTED - Findings ADOPTED
 11-2-07 - File to Planning and Land Use Management Committee Clerk OK
 11-6-07 - File in files

Online Documents (Doc)

Title	Doc Date
Report from Cultural Heritage Commission	07/17/2007

Council Vote Information

Meeting Date: 10/02/2007
 Meeting Type: Regular
 Vote Action: Adopted
 Vote Given: (14 - 0 - 1)

Member Name	CD	Vote
RICHARD ALARCON	7	YES
TONY CARDENAS	6	YES
ERIC GARCETTI	13	YES
WENDY GREUEL	2	YES
JANICE HAHN	15	YES
JOSE HUIZAR	14	ABSENT
TOM LABONGE	4	YES
BERNARD C PARKS	8	YES
JAN PERRY	9	YES
ED REYES	1	YES
BILL ROSENDAHL	11	YES
GREIG SMITH	12	YES
JACK WEISS	5	YES
HERB WESSON	10	YES
DENNIS ZINE	3	YES

ATTACHMENT E

South Brentwood Residents Association

Our Coral Trees Will Survive Because of You!

Feb 7, 2012

After the red car line running along the Brentwood median was removed in the 1940s, our community resolved to plant trees where the tracks once lay.

Horticulturist Samuel Ayres, Dave Barry and Hugh Evans persuaded the city to plant coral trees, native of South Africa, for their remarkable beauty. It's said that the trees originally began as rooted cuttings from Hugh Evans, owner of the well-known Evans and Reeves Nursery on Barrington Ave.

Coral trees are fragile; limbs break relatively easily from wind and their own weight, and too much water can cause them to fall, exposing pedestrians and joggers on the median and traffic on San Vicente to danger.

Tree experts advise that Coral Trees need to be pruned at least once a year to insure their health and longevity. However, due to budgetary constraints, the city has cut all funding for their maintenance and care.

Brentwood Coral Tree Endowment Fund, a project of Brentwood.90049 (a 501(c)3 nonprofit) has been established to promote the long-term health and beauty of our Coral Trees.

Co-Chaired by Mary Ann Lewis, Jim Thomas and Bob Berglass, this community effort to protect the Coral Trees, the unique emblem of Brentwood, depends upon each of us.

All of the money raised will create the endowment to pay the cost of care and annual maintenance of the Coral Trees.

For further information call 310-472-1000

Contribute by check payable to: Brentwood.90049 – Coral Tree Endowment Fund

149 S. Barrington Ave. #194

Los Angeles, CA 90049

OUR CORAL TREES—OUR NEIGHBORHOOD—OUR HISTORY

ATTACHMENT
F

15

California Office of Historic Preservation
Department of Parks & Recreation

Technical Assistance Series



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Revised March 2017

INCENTIVES FOR HISTORIC PRESERVATION IN CALIFORNIA

CALIFORNIA OFFICE OF HISTORIC PRESERVATION TECHNICAL ASSISTANCE SERIES #15

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13 September 2013

Preface

The programs listed in this document will assist anyone interested in the field of historic preservation to locate funding and incentives available to qualified historic properties. Some of the programs are incentive based while others rely on a designated funding source, or on a commitment from an overseeing jurisdiction. Certain program funding may be based on annual budgets at the federal, state, or local levels, while others are ongoing programs involving credits or abatements. Programs may also be regulatory or code driven.

This document includes Internet addresses for each listed program. Readers are advised to visit the web sites for contact information including address, phone and fax numbers, in-depth background, and for up-to-date information on the listed incentives and programs.

OHP wishes to thank the following individuals for contributing to the compilation of this document. Staff members Jeanette Schulz, Bob Mackensen, Cheri Stanton, and Tim Brandt served as coordinators for formulation and content. Marie Nelson formatted the document for posting on the OHP web page. Additional OHP reviewers included Stephen Mikesell, Hans Kreutzberg, Eugene Itogawa, and Lucinda Woodward. Outside reviewers included Laura Westrup from the California State Parks Planning Division, Gail Ostergren from the Getty Conservation Institute, and Christine Fedukowski from the National Trust for Historic Preservation.

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For more information or additional copies contact:

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Office of Historic Preservation
ATTN: Tax Incentives Program
P.O. Box 942896
Sacramento, California 94296-0001
(916) 445-7011 office
(916) 445-7053 fax
E-mail: calshpo@parks.ca.gov

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content are found, please alert the Office of Historic Preservation (OHP) as soon as possible.

The activity that is the subject of this Incentive Manual has been financed in part with federal funds from the National Park Service, U.S. Department of the Interior. However, the contents and opinions do not necessarily reflect the views or policies of the Department of the Interior, nor does the mention of trade names or commercial products constitute endorsement or recommendation by the Department of the Interior.

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1. FEDERAL INCENTIVES

Advisory Council on Historic Preservation (ACHP)

Community Development Block Grants (U.S. Department of Housing and Urban Development)

Preservation Tax Incentives for Historic Buildings (National Park Service)

- 20% Rehabilitation Tax Credit
- 10% Rehabilitation Tax Credit
- Charitable Contributions (Easements)
- Investment Tax Credit for Low Income Housing (Affordable Housing)

TEA-21: Intermodal Surface Transportation Efficiency Act (ISTEA)

United States Small Business Administration (SBA)

2. STATE INCENTIVES

California Heritage Fund (Proposition 40)

Certified Local Government Grants (CLG)

Earthquake Retrofit Programs (state and local)

Marks Historical Rehabilitation Act

Mills Act Property Tax Abatement Program

Seismic Bond Act

Williamson Act Program

3. LOCAL INCENTIVES

Introduction: Local Incentives

Adaptive Reuse Ordinances

Business Improvement Districts

Planning and Zoning

Additional Local Incentives

4. ALTERNATIVE INCENTIVES: Grants, Loans, Credits, and Deductions

The 1772 Foundation

Americans with Disability Act (ADA) and Tax Incentives

- Disabled Access Tax Credit (26 USC 44)
- Expenditures to Remove Architectural and Transportation Barriers to the Handicapped and Elderly, as amended (26 USC 190) Getty Center Grants
- Architectural Conservation Planning Grants
- Architectural Conservation Implementation Grants
- Campus Heritage Grants-National Endowment for the Arts (NEA)
- Grants for Arts Projects-National Endowment for the Humanities Grants (NEH)

National Trust for Historic Preservation

- National Main Street Center
- National Trust Loan Funds
- Preservation Development Initiative
- Tax Credit Equity Investments
 - National Trust Community Investment Corporation
 - National Trust Small Deal Fund
- Additional NTHP Programs

National Trust for Historic Preservation Forum Funds

- Cynthia Woods Mitchell Fund
- Johanna Favrot Fund
- Preservation Services Fund

Partners for Sacred Places

Save America's Treasures (SAT)

5. CODES AND REGULATIONS

California Historical Building Code (CHBC)

APPENDICES

A. Guidance for successful tax applications

ADVISORY COUNCIL ON HISTORIC PRESERVATION

The Advisory Council on Historic Preservation (ACHP), an independent federal agency, has a mission to promote the preservation, enhancement, and productive use of our Nation's historic resources, and to advise the President and Congress on national historic preservation policy.

The ACHP was established by the National Historic Preservation Act of 1966 (NHPA), which encourages Federal agencies to be responsible stewards of the Nation's historic resources by including consideration of historic preservation in project requirements. As part of its duties as defined in the NHPA, ACHP is a policy advisor and recommends administrative and legislative actions to improve protection of our nation's heritage. It is the only entity with the legal responsibility to advocate for, and encourage full consideration of, historic values in federal decision making. One of its prime duties is the review of federal programs and policies to ensure they will be effective, coordinated, and consistent with national preservation policies.

PROGRAM AREAS

Federal Agency Programs administers the NHPA Section 106 review process and works to improve Federal agency consideration of historic preservation values in their programs.

Communications, Education, and Outreach conveys ACHP's vision and message to constituents and the general public through education, information, and recognition of historic preservation achievements.

Preservation Initiatives focuses on partnerships and program initiatives such as heritage tourism to promote preservation with local and state governments, Indian Tribes, and the private sector.

Preserve America Initiative promotes cultural and natural preservation and encourages a greater appreciation of national treasures, from monuments and buildings to landscapes and main streets. Emphasis is on retaining regional identities, supporting local pride in our cultural and natural heritage assets, and sustaining the economic vitality of our neighborhoods and communities.

Major components of the *Preserve America* initiative include:

- **Preserve America Presidential Awards** are annual awards given for: accomplishments in the sustainable use and preservation of cultural or natural heritage assets; demonstrated commitment to the protection and interpretation of America's cultural or natural heritage assets and the integration of these assets into contemporary community life; and a combination of innovative, creative, and responsible approaches to showcasing historic resources in communities.

- **Preserve America Communities** provides recognition and designation of communities that: protect and celebrate their heritage; use their historic assets for economic development and community revitalization; and encourage people to experience and appreciate local historic resources through education and heritage tourism programs.
- **Federal Support** provides technical and financial assistance to: bolster local preservation efforts; support better integration of heritage preservation and economic development; and foster and enhance intergovernmental and public-private partnerships to accomplish these goals.

FURTHER INFORMATION:

Web-Available Studies on the Economic Impacts of Historic Preservation

Advisory Council on Historic Preservation

<http://www.achp.gov/index.html>

Heritage Tourism

<http://www.achp.gov/heritagetourism.html>

Financial Assistance Sources

<http://www.achp.gov/funding.html>

- General Historic Preservation
- Community and Economic Development
- Cultural and Arts Programs
- Disaster Response
- Natural Resource Conservation and Recreation Programs
- Specific Property Types
- State, Tribal and Local Government

Preserve America

<http://www.preserveamerica.gov>

COMMUNITY DEVELOPMENT BLOCK GRANTS (CDBG)

The Community Development Block Grant (CDBG) Program is a program of the U. S. Department of Housing and Urban Development (HUD). Although it is a federal program that must conform to certain national HUD objectives, the allocation of the money within the community is at the discretion of local officials. Local governments use these annual direct grants from HUD to shape local programs that meet important objectives in community development.

The program is not a historic preservation program (its broad mission is to foster community development and to benefit low and moderate income persons), but it can fund particular activities that enhance and support historic preservation.

Community members and local officials who wish to make the most of CDBG grants will find a number of ways to link historic preservation to other community development and revitalization objectives. Historic preservation activities usually concentrate on rehabilitation, preservation, and restoration of public or privately owned properties. However, preservation activities may also be coordinated with new construction as well as with economic development, energy conservation and other objectives in a community's CDBG program.

A PARTIAL LIST OF ELIGIBLE CDBG ACTIVITIES WHICH MAY SUPPORT HISTORIC PRESERVATION

Planning

- Preparation of historic preservation elements of general plans
- Historic and archeological surveys of CDBG project areas
- Data collection, studies, analysis and the preparation of plans and implementing measures including budgets, codes, and ordinances
- Delineation of historic districts, including reuse plans and the preparation of ordinances and codes to assure preservation of the districts

Engineering and Design Costs

- Feasibility studies to assess the condition of structures, including historic properties
- Design improvements to the façade of structures, including historic buildings
- Removal of architectural barriers in older buildings, including historic buildings

Consultant Services

- Obtain professional assistance for program planning, including historic preservation

Acquisition

- Acquisition of properties, including historic properties, by a public agency or private not-for-profit entity
- Acquisition by purchase, lease, donation, or otherwise, of real property, including easements and facade easements

Clearance Activities

- Moving a historic structure from a project site
- Clearing incompatible structures from a historic site

Property Rehabilitation

- Includes privately owned residential buildings and improvements limited to facade and code requirements
- Publicly owned residential buildings
- Publicly owned nonresidential buildings
- Energy system improvements

Removal of Architectural Barriers**Payment of the non-Federal Match Required in Connection with a Federal Grant-in-Aid Program**

- CDBG funds can be used as match for grants under the federal Certified Local Government program administered by the Office of Historic Preservation

To find out if your community received CDBG funds, to determine what programs are assisted by CDBG funds, or to influence how CDBG funds are allocated in your community contact your local planning department, economic development department, community development department, or local redevelopment agency.

FURTHER INFORMATION:

The document *Historic Preservation in Housing and Community Development: Linking Historic Preservation to Community Development Block Grant Objectives* can be accessed at this address:

http://portal.hud.gov/hudportal/documents/huddoc?id=DOC_13716.pdf

Historic Preservation and Heritage Tourism in Housing and Community Development, a guide to using CDBG funds for historic preservation and heritage tourism, is now available online:

http://portal.hud.gov/hudportal/documents/huddoc?id=DOC_14212.doc

General information on the HUD Community Development Block Grant Programs is available at:

<http://www.hud.gov/offices/cpd/communitydevelopment/programs/>

California CDBG Contacts and California Housing & Community Development:

<http://www.hcd.ca.gov/fa/cdbg/EconDevelopment.html>

20% REHABILITATION TAX CREDIT

Preservation Tax Incentives for Historic Buildings

Tax credits provide an important tool in the rehabilitation of historic properties. This federal program provides a dollar-for-dollar income tax reduction credit equal to 20% of qualified rehabilitation expenditures on income producing properties that are certified historic structures. Certified historic structures are either individually listed in the National Register of Historic Places (NRHP), or are contributors to a NRHP District. Properties not yet listed may apply for a preliminary determination of eligibility by filing a Part 1 form.

The property must be rehabilitated following the *Secretary of the Interior's Standards for Rehabilitation* (1990). The project costs must exceed either \$5000 or the adjusted basis of the building, whichever is higher. For larger projects, developers typically enter into a partnership with "tax credit investors" to more efficiently use the tax credit benefits. The developer serves as general partner with the tax credit investor being a limited partner, making an equity contribution to the project in exchange for the tax credit benefits. Under certain circumstances, non-profit organizations may also enter into such a partnership to allow their projects to benefit from the tax credit.

This is one of the most successful and cost-effective community revitalization programs which also attracts private investment in the historic cores of cities and towns. New jobs, enhanced property values, urban renewal, new municipal revenues, improved properties, and a lively, diverse and attractive community are other benefits realized from completed projects.

PROGRAM GUIDELINES

The Tax Incentives program is implemented by federal regulations under 36 CFR Part 67 and is a three-way partnership between the local state Office of Historic Preservation (SHPO), the National Park Service (NPS), and the Internal Revenue Service (IRS):

SHPO

- First point of contact
- Provides forms, regulations, and other information
- Maintains records of State's National Register properties
- Processes forms for listing
- Assists with information on appropriate rehabilitation treatments and materials

NPS

- Processes program fees
- Reviews all applications for conformance with the *Standards*
- Issues all certifications (approval or denial) in writing to owner
- Transmits copies of documents to the IRS
- Develops and publishes program regulations, the *Standards*, other publications and maintains

IRS

- Publishes regulations governing which rehabilitation expenses qualify for credits
- Sets time periods for incurring expenses
- Has procedural and legal oversight for claiming 20% and 10% credits
- Publishes audit guide for financial and legal aspects

- Assists with tax credit applications and sends project review to NPS
- a web-site
- Insures that only qualified parties claim the credits

APPLICATION

- Contact the SHPO for forms and to determine whether your property is National Register eligible. Forms and information may be downloaded from the NPS website or the CA SHPO website link.
- File a Part 1 (Evaluation of Significance) to start the program (individually listed properties do not need to file a Part 1, unless the listing consists of more than one building. Photos and a location map are important components of the application.
- File the Part 2 (Description of Rehabilitation Work) to clearly describe all the project work and how historic fabric might be affected. One of the most critical parts of the Part 2 is photos of “before” conditions so the NPS may compare the building before and after work. Lack of such photos can result in denial of the project, as review cannot be completed without them. Drawings should accompany the Part 2 application.
- File the Part 3 (Request for Certification of Completed Work) after work is completed. Include photos of completed work, taken from the same locations as “before” photos. When filing the Part 3 be sure to contact your accountant or financial advisor for the details of claiming the credit. In certain instances, alternative minimum taxes and passive activity limitations may limit the use of the rehabilitation tax credits.
- All submissions should be submitted in duplicate form. OHP retains one original copy and forwards the second original copy to NPS.

Most tax incentive rehabilitation projects are completed in a two-year cycle and the credits are claimed when the Part 3 is filed. For complex projects, or those with complex financing, it is possible to request a five-year, phased program. This must be done at the time the Part 2 is filed and must be accompanied by a detailed explanation of the phases. Credits may be taken in increments during the five-year period by filing a Continuation Sheet explaining the completion of a work phase. It is important to be aware that the whole project is reviewed, and later work if not done in accordance with the *Standards*, may result in denial and recapture of the previous credits granted.

CHECKLIST

- Two sets of applications, photos and other documentation must be sent to the SHPO. **Do not bind applications**, as both the SHPO and NPS have archival file and storage standards that require applications to be unbound for processing.
- All cover sheets must have original owner signature(s) and date on both copies.
- Both the SHPO and NPS prefer actual photographs to digital images. If used, digital images should have a high resolution, providing the same clarity and level of detail as actual photographs. Unclear photographs could result in an inability to evaluate the project and necessitate return of the application. In any case, images should be loose and not bound, labeled on the back, and keyed to a plan.

- The Part 2 application should reference all photos and drawing sheets for each item discussed.
- Do not send review fees to the SHPO. The NPS processes fees when the Part 2 is received in their office and sends a letter requesting payment. To expedite the fee request, a NPS credit card payment form may be completed and submitted to SHPO with the Part 2 and Part 3 application for forwarding to NPS with the completed review. The credit card form may be downloaded from the NPS website or the CA SHPO website link.
- Any change in a previously approved scope of work must be reported to the SHPO and the NPS, usually by an amendment to the Part 2, to be filed with the SHPO.
- Do not delay in contacting the SHPO with any questions during the course of the project. The SHPO's role is to assist in ensuring that the project meets the *Standards* and is successful.

FURTHER INFORMATION:

****Please see Appendix A for guidance in preparing a successful application.**

NPS Historic Preservation Planning Services	http://www.nps.gov/history/hps/pad/
NPS technical preservation services:	http://www.nps.gov/tps/about.htm
Internal Revenue Service	http://www.nps.gov/tps/tax-incentives/before-apply/irs.htm
Federal Regulations 36 CFR Part 67	http://www.gpo.gov/fdsys/pkg/CFR-2012-title36-vol1/pdf/CFR-2012-title36-vol1-part67.pdf
36 CFR Part 67, see also:	http://www.wbdg.org/references/code_regulations.php?i=290&r=1

10% REHABILITATION TAX CREDIT

Preservation Tax Incentives for Historic Buildings

A 10% rehabilitation tax credit is available for the rehabilitation of *non-historic buildings* that were built before 1936. The 10% credit applies only to buildings, not to ships, bridges or other structures.

PROGRAM GUIDELINES

- The rehabilitation must be *substantial*, exceeding either \$5,000 or the adjusted basis of the property, whichever is greater, and the property must be depreciable.
- Rehabilitation must be for *non-residential* uses. Rental housing does not qualify for the 10% credit. Hotels qualify as they are considered to be commercial use, not residential use.
- A building that was been moved *before* 1936 can be eligible for the 10% credit.

Projects undertaken for the 10% credit must meet a specific physical test for retention of external walls and internal structural framework:

- 50% or more of the building's existing walls must remain in place as external walls at the work's conclusion, and
- 75% or more of the building's existing external walls must remain in place as either external or internal walls, and
- 75% or more of the building's internal structural framework must also remain in place.

ELIGIBILITY AND RESTRICTIONS

The 20% and 10% credits are mutually exclusive. Only one may be applied to a given project. Which credit applies depends on the building, not on the owner's preference.

- Buildings listed individually or as district contributors in the National Register of Historic Places are not eligible for the 10% credit.
- Buildings located in certified State or local historic districts are presumed to be historic and are therefore not eligible for the 10% credit.
- Owners of buildings in National Register or certified State or local historic districts may claim the 10% credit *only* by filing a Part 1 of the Historic Preservation Certification Application with the SHPO and National Park Service and receive a determination that the building does *not* contribute to the district and is *not* a certified historic structure.
- Owners of historic buildings denied certification for the 20% credit may not claim the 10% credit.

CLAIMING THE 10% REHABILITATION TAX CREDIT

The tax credit must be claimed on IRS form 3468 for the tax year in which the rehabilitated building is placed in service. The owner files the 3468 form directly; there is no formal review process for rehabilitations of non-historic buildings.

FURTHER INFORMATION:

National Park Service
IRS Form 3468

<http://www.nps.gov/tps/tax-incentives.htm>
<http://www.irs.ustreas.gov/pub/irs-pdf/f3468.pdf>

CHARITABLE CONTRIBUTIONS FOR HISTORIC PRESERVATION PURPOSES

(Conservation Easements)

Preservation Tax Incentives for Historic Buildings

Internal Revenue Service Code Section 170(h) and Department of Treasury Regulations Section 1.170A-14 provide for income and estate deductions for charitable contributions of partial interests in historic property (principally easements). Valuations usually range from 10-15% of the structure's fair market value. To qualify, the gift of an easement for conservation purposes such as the preservation of the facade of a certified historic structure must be made to a holding entity and must be protected in perpetuity. Easements may be made for a facade, a building exterior (and its grounds), historically important building interiors, or for development rights for historically important land areas (open space agreements). Easements become part of the chain of title and bind present and future owners. However, establishment of such restrictions does not prevent the property owner from retaining possession and use of the property. Exterior work may need to be reviewed for appropriateness, but any interior modifications are at the discretion of the owner, unless the easement is for a significant interior.

ELIGIBILITY

The conservation easement donation can be from a structure that is used either for business or non-business. Personal residences as well as commercial properties may take advantage of this provision.

The property must only be a "certified historic structure," which is a property either:

- already listed individually in the National Register of Historic Places; or
- located in a National Register historic district and certified by the Secretary of the Interior as being of historic significance to the district (a "contributor").

Properties not yet listed may file if there is a preliminary determination that the property is National Register eligible and the nomination form will be filed and the property listed by the time federal taxes are due in the year following the donation (plus six months extension time).

PROGRAM GUIDELINES

- If the historic structure is not visible from a public way, arrangements must be included to permit regular viewing by the general public of its historic character and features; to the extent such viewing is consistent with the nature and condition of the property.
- If the property is subject to a mortgage, a special rule is that the mortgagee must agree to subordinate its rights to the property to the right of the donee to enforce the conservation purposes in perpetuity.
- If the value of the donation and deduction exceeds \$5000, the taxpayer must obtain a qualified appraisal and attach a full summary to the income tax return.
- A facade easement may be claimed for a qualified rehabilitated building. However, if the donation is made within the five year 20% Rehabilitation Tax Credit recapture period, the donation is considered a partial disposition of the property and will trigger recapture of all or part of the rehabilitation credits.

The donation is made only once, but the tax deduction may be distributed over a six year period and may usually be claimed on both federal and state tax returns.

FURTHER INFORMATION:

Historic Preservation Easements: A Directory of Historic Preservation Easement Holding Organizations, Claire Schofield, 2003:

<http://www.ohp.parks.ca.gov/pages/1074/files/easementsdirectory.pdf>

National Park Service – easements:

<http://www.ohp.parks.ca.gov/pages/1074/files/easements-historic-properties.pdf>

NPS Heritage Preservation Services--IRS facades:

Facade Easement Contributions Removed, pending
IRS revisions, July, 2007.

In the Los Angeles area: LA Conservancy:

<https://www.laconservancy.org/resources/guide/conservation-easements-permanent-protection-historic-places>

INVESTMENT CREDIT FOR LOW-INCOME HOUSING

Preservation Tax Incentives for Historic Buildings

The Tax Reform Act of 1986 (IRC Section 42) established an investment tax credit for acquisition, construction, or rehabilitation of low-income housing. The credit is approximately 9% per year for 10 years for each unit acquired, constructed, or rehabilitated without other federal subsidies and approximately 4% for 10 years for projects subsidized by tax-exempt bonds or below market federal loans. Through syndicated sale of this credit it can be possible to finance project construction costs at 30-60% of expenses.

This federal program is aimed at encouraging owners to develop and provide low-income housing to a community. While broader in scope than preservation, this credit can be used alone or concurrently with the Federal Historic Preservation Tax Incentive, which creates additional financial credits to make the low-cost housing project more viable. These credits are usually sold to individual or corporate investors through private or public syndication to create funding.

ELIGIBILITY

- Providing rental housing is the only eligible project for the low-income credits.
- Credits may be used for rehabilitation of existing properties or for new construction. Cost calculation is based on the depreciable costs of the property that is used in common areas.
- There are income threshold limits for initial occupants which cannot exceed 60% of the area median, adjusted for household size; requirements for cost per unit; limits on number of units; and financial commitment requirements for the owners.
- The credit allocations are factored on the eligible cost basis of the project, which encompass both hard and soft development costs. Land costs are excluded, but some acquisition costs can be part of the credit.
- Tax-exempt property may receive the credits. However, rental units must be leased to qualified low-income tenants and the rents must be restricted.
- Location of the property in either a qualified census tract (50% or more of households have incomes less than 60% of the area median gross income) or in a difficult development area may allow for an increase of the credit up to 130% of the construction or rehabilitation expenditures.
- The eligible basis for computing the low income credit must be reduced by the amount of any rehabilitation tax credit or any federal grants obtained.
- The credit is available after units are occupied by qualified tenants.
- Federal law sets a 15-year credit compliance period.
- Buildings must be maintained as affordable housing for a period of not less than 30 years. However, California's program generally requires maintaining affordability for 55 years.
- Credits are allocated by State housing credit agencies and are competitive.

The program is administered by the California Tax Credit Allocation Committee (TCAC) through the State Treasurer and the U.S. Internal Revenue Service. TCAC administers two low income housing tax credit programs, a federal program and a state program. Both programs were authorized to encourage private investment in rental housing for low and lower income families and individuals.

FURTHER INFORMATION:

Code References

- Tax Reform Act of 1986; Internal Revenue Code Section 42
- California Code of Regulations, Title 4, Division 17, Sections 10300-10337

Federal Historic Preservation Tax Incentives - Topical Tax Brief – Comparison of the Historic Rehabilitation Tax Credit and the Low Income Housing Tax Credit:

http://www.nps.gov/tps/tax-incentives/taxdocs/IRS_HRTC_LIHTC.pdf

California Tax Credit Allocation Committee:

<http://www.treasurer.ca.gov/ctcac/>

TEA-21

THE TRANSPORTATION EQUITY ACT FOR THE 21ST CENTURY

UNITED STATES DEPARTMENT OF TRANSPORTATION

TEA-21 enacted June 9, 1998, authorized federal surface transportation programs for highways, highway safety, and transit for the years 1998-2003. The TEA 21 Restoration Act, enacted July 22, 1998, provided technical corrections to the original law. In August 2003, the California Transportation Commission (CTC) integrated the Transportation Enhancements (TE) program into the State Transportation Improvement Program (STIP). The 2004 STIP Guidelines, adopted December 11th, further clarify and direct programming of TE funded projects or project enhancement elements, into the STIP.

The concept is to enhance, maintain, and preserve the existing transportation network while more creatively and sensitively integrating it into the surrounding communities. The goal is to create a “more-than-adequate” transportation experience that provides an aesthetic, pleasant and improved interface between a particular transportation mode and the people of the adjacent communities. Federal transportation funds are to be granted for use in capital improvement projects that enhance quality-of-life, in or around transportation facilitates. Projects must be above and beyond regular mitigation and regular programs, and the proposed project must directly relate back to an existing transportation system. Several eligibility categories emphasize historic properties such as landscapes, buildings, and archeological sites and related resources. The program is overseen by the Federal Highway Administration. In California, the California Department of Transportation (CALTRANS) administers the program.

ELIGIBILITY AND SELECTION CRITERIA

There are three basic selection criteria that form the initial screening to determine whether a project fits the program. All three criteria must be met for the project to qualify.

1. The project must have at least one direct relationship to the surface transportation system (excluding aviation).
2. Enhancement activities must be above and beyond a normal project. Generally normal mitigation, standard landscaping, permitting, routine maintenance activities, and ADA compliance are not eligible.
3. The project must be encompassed under one or more of twelve activity categories. Only the activities listed in U.S. Code, Title 23 Section 101(a) are eligible and if the association is unclear, a detailed reasoning and explanation must be provided for a determination of eligibility by CALTRANS and the Federal Highway Administration.

The twelve categories are:

- Provision of facilities for pedestrians and bicycles.
- Provision of safety and educational activities for pedestrians and bicyclists.
- Acquisition of scenic easements and scenic or historic sites.

- Scenic or historic highway programs (including the provision of tourist and welcome center facilities).
- Landscaping and other scenic beautification.
- Historic preservation.
- Rehabilitation and operation of historic transportation buildings, structures or facilities (including historic railroad facilities and canals).
- Preservation of abandoned railway corridors (including the conversion and use thereof for pedestrian or bicycle trails).
- Control and removal of outdoor advertising.
- Archaeological planning and research.
- Mitigation of water pollution due to highway runoff or reduce vehicle-caused wildlife mortality while maintaining habitat connectivity.
- Establishment of transportation museums.

ADDITIONAL REQUIREMENTS

- TEA activities are reimbursable projects and applicants are expected to finance the project as it proceeds. Local funding share must be used in each phase.
- A match of approximately 12 match dollars to each 88 federal dollars for a total of 100 dollar units is required in each enhancement project phase.
- Administration agencies must receive an authorization to proceed before reimbursable work can begin in each phase.
- The project must be accomplished without an adverse effect on a cultural, historical, archaeological or environmental resource. Work must be done in compliance with the Secretary of the Interior's Standards for Archeology and Historic Preservation, the Secretary of the Interior's Standards for the Treatment of Historic Properties, or the California Historical Building Code and must be managed under the direction of cultural resource professionals meeting the education and experience standards published in the Code of Federal Regulations, 36 CFR, Part 61.
- In some circumstances, the cultural and sacred values of Native American or other ethnic community sites may require the inclusion of additional viewpoints. Evidence must be provided that appropriate representatives have been consulted.
- Responsibilities under the Americans with Disabilities Act (ADA) must be met.
- Provisions of the California Environmental Quality Act (CEQA), the National Environmental Policy Act (NEPA), other permitting, and local regulations must also be considered and included in a reasonable schedule.
- The project must be consistent or "not inconsistent" with regional and local transportation plans.
- The project must have a public, political sponsor and administering agency supervision.

FURTHER INFORMATION:

U.S. Department of Transportation Federal Highway Administration (FHWA):

www.fhwa.dot.gov/tea21/index.htm

California Department of Transportation (CALTRANS) Program guidelines:

| <http://www.dot.ca.gov/hq/TransEnhAct/test/index.htm>

CALTRANS local contact list:

<http://www.dot.ca.gov/hq/TransEnhAct/schedule.htm>

National Transportation Enhancement Clearinghouse:

<http://www.enhancements.org>

UNITED STATES SMALL BUSINESS ADMINISTRATION (SBA)

The mission of the SBA is to maintain and strengthen the nation's economy by aiding, counseling, assisting, and protecting the interests of small business and by helping families and businesses recover from national disasters.

On a regular basis, SBA makes direct business loans, pre-qualifies loans, guarantees bank loans to small businesses, makes micro-loans, and helps business owners with management plans, technical and contracting assistance, and business training. Financial assistance is usually in the form of loan guarantees and pre-qualification, as the SBA guarantees loans made by banks and other private lenders to small business clients. The SBA also assists in plans to raise capital, provides micro-loans, explains equity investments, provides guarantees for contract surety bonds for bids, payment, performance and ancillary needs, advocates for government contracting, and supports initiatives for special interests such as Women Entrepreneurs, Veterans, Native American affairs, and management and business magazines.

In partnership with the Federal Emergency Management Agency (FEMA), it also assists in recovery from natural disasters by offering loans to homeowners or renters to repair or replace damages to real estate or personal property. Businesses of any size may apply for loans to repair or replace disaster damages to real estate, machinery, equipment, inventory and supplies. Economic injury recovery loans provide working capital to assist through the initial recovery period and are only for applicants who lack other resources.

Business Loans

SBA defines a small business as one that is independently owned and operated and not dominant in its field. A small business must also meet the employment or sales standards developed by the Small Business Administration as based on the North American Industry Classification System (NAICS).

In general, SBA uses the following criteria to determine if a concern qualifies as a small business and is eligible for SBA loan assistance:

- **WHOLESALE:** Not more than 100 employees.
- **RETAIL or SERVICE :** Average (3 year) annual sales or receipts of not more than \$6 million to most retail and service industries, and up to \$29 million for others, depending on business type.
- **MANUFACTURING:** Generally not more than 500 employees, but in some cases up to 1,500 employees.
- **CONSTRUCTION:** Average (3 year) annual sales or receipts of not more than \$12 million to \$28.5 million, depending on the specific business type.
- **AGRICULTURAL INDUSTRIES:** \$0.75 million for most industries in this category.

All assistance is in the form of loans, and applicants must have the ability to repay the loans. Collateral is required for larger loans, but does not necessarily have to cover the full amount. Repayment scheduling is based on applicant's ability to pay for up to a maximum of 30 years.

Not eligible are: Real estate investors, lenders, pyramid sales plans, properties supporting illegal activities, general gambling (limited lottery ticket sales or other state licensed activities are not ordinarily restricted), and charitable, religious, or other non-profit institutions, government-owned corporations, consumer and marketing cooperatives, and churches and organizations promoting religious objectives.

Disaster Loans

The mission of SBA's Disaster Assistance Program is to offer financial assistance to those trying to rebuild their homes and businesses in the aftermath of a disaster. By offering low-interest loans, the SBA is committed to long-term recovery efforts.

Please note that the disaster that caused your damage must be an officially designated federal disaster in order for this program to take effect. In partnership with FEMA, the SBA will set up field offices to answer questions and process applications. SBA loans are not immediate emergency relief, as application processing usually takes seven to 21 days. The focus is on financing long-term rebuilding and repairing.

- **Home Disaster Loans:** Loans to homeowners or renters to replace damages to real estate or personal property. Renters may apply for personal property losses. Autos and mobile homes may also be eligible, but only for uninsured losses.
- **Business Physical Disaster Loans:** Loans to businesses to replace or repair damages to business property including real estate, machinery and equipment, inventory, and supplies. Note that businesses of any size are eligible for this disaster-related loan. In addition, non-profit organizations such as charities, churches, and private universities, etc. are also eligible.
- **Economic Injury Disaster Loans (EDIL):** Loans to provide working capital to small businesses and small agricultural cooperatives to assist with recovery. EDIL is for applicants with no credit available elsewhere; it is available only if the business and its owners cannot provide for their own recovery from non-government sources. Funds are intended to cover obligations as they mature and to pay ordinary and necessary operating expenses.

DISASTER LOANS PROGRAM REQUIREMENTS

- **Size:** Businesses must meet small business definitions for general loans. Disaster loans do not require a business "size limit," and private home owners and renters may also apply.
- **Location:** Disaster Relief applicants must be located in a declared and designated federal disaster area.

- **Repayment:** SBA's business loan and disaster relief assistance is in the form of loans. Applicants must show the ability to repay all loans.
- **Collateral:** Business loans over \$10,000 must be secured by the pledging of collateral to the extent that it is available. The SBA will however, make other arrangements if no collateral is available.

DISASTER LOANS LIMITATIONS

- Home loans are limited by regulation to a maximum of \$200,000 to repair or replace real estate and \$40,000 to repair or replace personal property. Actual amount is limited to the verified uninsured disaster loss.
- Business loans are limited by law to a maximum of \$1,500,000 for real estate, machinery and equipment, inventory and all other physical losses. Actual amount is limited to the verified uninsured disaster loss.
- Economic Injury loans are limited by law to a maximum of \$1,500,000 and reimburse only the actual economic injury as calculated by SBA and not covered by insurance, and otherwise beyond the ability of the business and its owners to provide.

SBA's business assistance and loans and the disaster recovery program can be very useful to help owners of small businesses housed in historic properties. The disaster recovery programs can assist private owners of historic properties conduct repairs and thus recover from natural disasters.

FURTHER INFORMATION:

U.S. Small Business Administration

<http://www.sba.gov>

CALIFORNIA Cultural and Heritage Endowment (CCHE)

Landmarks California Program

The California Cultural and Historical Endowment (the Endowment) was established at the California State Library in 2003 when then-Governor Gray Davis signed AB 716 (Firebaugh) ([PDF](#)) | ([HTML](#)) The Legislature intended the CCHE to raise the profile and scope of California's historic and cultural preservation program in an era of cultural homogeneity and dwindling historic structures. CCHE grants have helped to preserve the many historic treasures that are California's cultural legacy. These sparkling jewels belong to all of us collectively and convey important lessons about opportunity, hardship, innovation, injustice, perseverance, and redemption. Peer inside the CCHE jewel box at www.californiastreasures.org and discover the hidden gems of California's past, now preserved for generations to come.

In 2011, the CCHE published Preserving California's Treasures to showcase the 180 capital projects and planning grants funded by the CCHE. CCHE no longer has any copies of the first printing available to sell directly, but a limited number of copies are available at two retail outlets: The Pasadena Museum of History and The San Diego County Department of Parks and Recreation. To purchase a copy from the Pasadena Museum of History, call (626) 577-1660. To purchase a copy from the San Diego County Department of Parks and Recreation, call (858) 966-1308. CCHE is working to produce a second run of the publication due to the demand.

Since 2010, CCHE has been collaborating with leaders from several statewide preservation organizations and has played a central role in the development of an ongoing program called Landmarks California: the Places of our Diverse Histories and Cultures.

The Landmarks California program is intended to demonstrate the many positive outcomes of historic preservation: environmental and financial sustainability, a means of telling the many stories that comprise California's diverse history, and a social fabric strengthened by a sense of pride and belonging to the community. This ongoing program will continue to advance the CCHE's goal of strengthening and deepening Californians' understanding of California's history, its present society and themselves, with the end goal of better communities and neighborhoods. Visit www.landmarkscalifornia.org for more project details.

FURTHER INFORMATION:

California State Library California Cultural and Historical Endowment:

<http://www.library.ca.gov/grants/cche/>

The Resources Agency has created a website where the public can obtain information about projects in their community funded by Proposition 40, which is now entirely allocated:

[Prop 40 Project Award Information](#)

CERTIFIED LOCAL GOVERNMENT GRANTS

In recognition of the need to involve local governments in historic preservation, the 1980 amendments to the National Historic Preservation Act provided a specific role for them in the national program by establishing the Certified Local Government (CLG) program. A CLG is a local government whose historic preservation program has been certified by the Office of Historic Preservation and the National Park Service. General requirements include a preservation ordinance, a qualified historic preservation review commission established by local law, a survey and inventory program, and adequate public participation in the local historic preservation program. Any local government is eligible to apply for certification, with the exception of regional commissions and councils of government. A local government is any general purpose political subdivision of California such as a city, county, or city/county government.

In order to strengthen the federal/state/local partnership, the Historic Preservation Fund (HPF), a line item in the federal budget, provides an annual grant to each state historic preservation office. At least ten percent of the state's annual HPF allocation is passed through to CLGs on a competitive basis. HPF grants are awarded to CLGs on a 60/40 (federal/local) matching basis. It is worth noting that Community Development Block Grant (CDBG) funds, discussed elsewhere in this document, are federal funds that may be used as local match for federal grants such as CLG grants.

In California, CLG grants can be used for historic preservation planning activities, but not for bricks and mortar projects. Funded activities include:

- General Plan Historic Preservation Elements
- Ordinance Revisions
- Historic Contexts and Surveys
- National Register of Historic Places District or Multiple Property Nominations
- Archeological Preservation Plans
- Design Guidelines for Historic Properties
- Preservation Education and Outreach Programs
- Historic Structure Reports/Preservation Plans
- Information Management and Technology

FURTHER INFORMATION:

California's CLG Program: http://www.ohp.parks.ca.gov/default.asp?page_id=1072

National CLG Program: <http://www.nps.gov/history/hps/clg/>

EARTHQUAKE RETROFIT PROGRAMS

EXISTING GOVERNMENT FINANCIAL INCENTIVE PROGRAMS

There are a variety of local, state and federally funded government programs that have provided, or are continuing to provide, financial incentives for owners of single family homes, mobile homes or apartments to structurally retrofit those buildings.

LOCAL GOVERNMENT PROGRAM EXAMPLES

(PROGRAMS ARE ON-GOING UNLESS OTHERWISE NOTED)

- Santa Cruz County – Brace for the Quake Program (1992-1996)
- City of Los Angeles – Seismic Mitigation Loan Program
- City of Oakland – Project SAFE
- City of Berkeley – Seismic Retrofitting Incentive Program
- Association of Bay Area Governments (ABAG) Finance Authority for Nonprofit Corporations, Affordable Housing Program
- City of San Leandro – Earthquake Retrofit Programs

STATE PROGRAMS

California Earthquake Authority – Residential Retrofit Program

CEA was established by State Legislature in 1996 as a privately funded, publicly managed entity to help California residents protect themselves against earthquake loss. In 1999, CEA launched SAFER (State Assistance for Earthquake Retrofits) in nine Bay Area counties. Enabling legislation can be found in the California Insurance Code, primarily in Sections 10089.5 through 10089.54.

California Department of Insurance – Grant and Loan Program

This grant program has operated since 1996. It is designed for low to moderate income homeowners, and pays for such retrofitting procedures as foundation anchoring, securing water heaters, installing automatic gas shut-off valves, and installing bracing for sheer walls. The maximum grant amount is \$8,000, or up to \$30,000 for foundation repair/replacement work. Grants are competitive and rated on need and income. This program is slated to end in December 2004, although it may be extended.

FURTHER INFORMATION:

Association of Bay Area Governments: Technical Appendix C, Existing Government Financial Incentive Programs for Earthquake Retrofit:

<http://www.abag.ca.gov/bayarea/eqmaps/nightmare/finance.pdf>

California Department of Insurance Earthquake Program:

<http://www.insurance.ca.gov/0100-consumers/0060-information-guides/0040-residential/earthquake-insurance.cfm>

California Earthquake Authority:

<http://www.earthquakeauthority.com>

City of San Leandro:

<http://www.sanleandro.org/depts/cd/bldg/retrofit/>

Saving Lives Through Earthquake Mitigation in Los Angeles:

<http://www.huduser.org/publications/destech/bigone/sect1.html>

Two publications that discuss seismic safety improvements, *The Commercial Property Owner's Guide to Earthquake Safety, 2005 Edition* (CSSC Pub. No. 05-01) and *The Homeowner's Guide to Earthquake Safety 2006 Edition* (CSSC Pub. No. 06-02), are available from the Seismic Safety Commission. Both are available in downloadable form or copies may also be purchased.

Seismic Safety Commission--general publications: <http://www.seismic.ca.gov/pub.html>

The Commercial Property Owner's Guide to Earthquake Safety, 2005 Edition (CSSC Pub. No. 05-01)

http://www.seismic.ca.gov/pub/CSSC_2006-02_COG.pdf

The Homeowner's Guide to Earthquake Safety 2006 Edition (CSSC Pub. No. 06-02)

http://www.seismic.ca.gov/pub/CSSC_2005_HOGreduced.pdf

MARKS HISTORICAL REHABILITATION ACT

The Marks Historical Rehabilitation Act of 1976 authorizes cities, counties, and redevelopment agencies to issue tax-exempt revenue bonds to finance the rehabilitation of significant historic buildings. The Act specifies the conditions and criteria under which the bonds can be issued.

The Marks Bond Act appears to have rarely been used due to the restriction that developers may not make capital expenditures of more than \$10 Million. Cities or counties are rarely willing to expend the time and money involved in issuing bonds for this small amount. If, however several major historic projects are undertaken in a jurisdiction at the same time and the collective costs and expenses total an amount high enough to justify staff time and fees to issue a bond, then the Marks Bond Act may prove to be a useful and desirable tool.

RELEVANT SECTIONS FROM CALIFORNIA HEALTH AND SAFETY CODE SECTION 10

NOTE: TEXT IS EXCERPTED, FOR FULL TEXT SEE LINK.

Chapter 1: General Provisions and Definitions (Sections 37600-37603)

Section 37601: Legislative Finding and Declarations

- State declaration that properties and structures of historical or architectural significance are an essential public resource and that it is necessary and essential that cities and counties be authorized to make long-term, low interest loans to finance the rehabilitation of properties of historic or architectural significance.
- Unless local agencies have the authority to provide loans for the rehabilitation of historic properties, many properties of historic or architectural significance will continue to deteriorate at an accelerated rate because loans from private sources are not sufficiently available for their rehabilitation.
- It shall be the policy of the state to preserve, protect, and restore the historical and architectural resources of the state.

Section 36602: Definitions

- **Bonds:** Any bonds, notes, interim certificates, debentures, or other obligations issued by a local agency pursuant to this part and which are payable exclusively from the revenues, as defined in subdivision (k), and from any other funds specified in this part upon which the bonds may be made a charge and from which they are payable.
- **Financing:** The lending of money or thing of value for the purpose of rehabilitation of historical properties and includes refinancing of outstanding indebtedness of the participating party with respect to property which is subject to historical rehabilitation, the acquisition of historical properties for the purpose of historical rehabilitation, or the acquisition of historical properties rehabilitated by a redevelopment agency functioning pursuant to Part 1 (commencing with Section 33000) of this division.
- **Historical rehabilitation:** The reconstruction, restoration, renovation, or repair of the interiors or exteriors of historical properties or their relocation for the purposes of

restoring or preserving their historical or architectural significance or authenticity, preventing their deterioration or destruction, continuing their use, providing for their feasible reuse, or providing for the safety of the occupants or passersby. Historical rehabilitation includes, but is not limited to, the repairing of architectural facades or ornamentation; removal of inappropriate additions or materials; replacement of facades, ornamentation or architectural elements previously removed; repairing of roofs, foundations, and other essential structural elements; installing parking areas, if required by local regulation or law for the use for which the property is intended after rehabilitation.

- **Historic rehabilitation area:** A geographic area, with specific boundaries, which is designated by a local agency as an area in which an historical rehabilitation financing program shall apply. It may encompass the entire jurisdiction of the local agency, or any portions thereof, including single parcels.
- **Historical property:** Any building of part thereof, object, structure, monument, or collection thereof deemed of importance to the history, architecture, or culture of an area as determined by an appropriate governmental agency. An appropriate governmental agency is a local official historic preservation board or commission, a legislative body of a local agency, or the State Historical Resources Commission. Historic property includes objects, buildings, structures, monuments, or collections thereof on existing national, state, or local historical registers of official inventories, such as the National Register of Historic Places and State Historical Landmarks.
- **Rehabilitation standards:** The applicable local or state standards for the rehabilitation of historical properties, including any higher standards adopted by the local agency as part of its historical rehabilitation financing program and including standards established pursuant to Part 2.7 (commencing with Section 18950) of Division 13, except that, for properties listed on or eligible for listing on the National Register of Historic Places, rehabilitation standards shall mean, at a minimum, those standards set forth by the United States Department of the Interior as *The Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings* as those standards may be applicable to any particular historical rehabilitation.

Chapter 2: Powers and Procedures (Section 37620-37631)

References the following information:

- Issuance of bonds for financing work.
- Fees, charges, interest rates and terms and conditions.
- Criteria for eligibility, standards, and citizen participation.

Chapter 3: Bond and Notes (Section 37640-37650)

References the following information:

- Issuance of negotiable bonds or notes for financing the rehabilitation of properties.
- Types of properties and types of bonds.

Chapter 4: Rehabilitation Loans (Section 37660-37662)

References the following information:

- Loan agreements and conditions.

Chapter 5: Construction and Effect (Section 37680-37682)

References the following information:

- General public welfare, jurisdiction and authority information.

Chapter 6: Supplemental and Additional Authority (Section 37683-37684)

References the following information:

- Supplemental and additional information.

FURTHER INFORMATION:

California Health and Safety Code, Part 10

Health and Safety Code 37600-37603

<http://www.leginfo.ca.gov/cgi-bin/displaycode?section=hsc&group=37001-38000&file=37600-37603>

MILLS ACT

California Property Tax Abatement Program

Since 1972 the Mills Act, sponsored by Senator James Mills of Coronado, has provided property tax relief to help preserve designated historic properties in California. It is a permissive program subject to approval and adaptation by city and county governments.

In order to help rehabilitate and maintain qualified historic properties, the Mills Act program allows for the voluntary creation of a contract between a private property owner and the city or county to provide a reduction in property taxes. The property tax relief is calculated by the capitalization of income method by the county assessor to reflect the Mills Act restrictions placed on the property. Mills Act properties are subject to annual reassessments by County Assessors which may result in slight increases in property taxes each year.

ELIGIBILITY

A property must be a “qualified historic property,” which is a privately owned property (residential or commercial) not exempt from property taxation and is either:

- Listed individually in the National Register of Historic Places (NRHP) or as a contributor to a NRHP District; or
- Listed in any state, county, city, or city and county official register of historical or architecturally significant places, sites, or landmarks.

PROVISIONS

The following items must be included in the language of the Mills Act contract, although local historical ordinances may require other provisions:

- Contract is for a minimum of 10 years
- Any work to restore or rehabilitate the property must follow the Secretary of the Interior’s Standards for Rehabilitation and the California Historical Building Code
- Inspections as may be necessary to assure compliance with the provisions of the contract
- Recognize that the contract is binding on successors in interest to the original owner
- Provisions for penalties for termination of contract

The local agency may charge a reasonable fee for administering the program. OHP must be notified in writing within six months of entering into a contract. Subsequent contract questions or cancellation may involve review by the California State Historical Resources Commission.

NOTE: City or county governments may apply a more limited definition of a qualified historic property. For example, in Los Angeles only locally designated properties or contributors to locally designated districts may participate.

FURTHER INFORMATION:

**OHP Technical
Assistance**

http://www.ohp.parks.ca.gov/default.asp?page_id=21412

Series #12

SEISMIC BOND ACT

California Revenue and Taxation Code (RTC) Sections 70(d) and 74.5

Section 70(d) implements Proposition 23, approved by the voters in 1984, and provides a 15-year new construction exclusion for improvements to **unreinforced masonry buildings (URMs)** undertaken to comply with local ordinances on seismic safety.

Section 70(d) was repealed in legislation described in the State Board of Equalization Letter to County Assessors: Seismic Safety New Construction Exclusions in 2010. See Further Information below.

Section 74.5 implements Proposition 127, approved by the voters in 1990, and provides a new construction exclusion for seismic improvements and improvements utilizing earthquake hazard mitigation technologies. This exclusion applies only to existing buildings and structures. The provisions of section 74.5 do not apply to seismic safety reconstruction and improvements to URMs that qualify for exclusion provided in section 70(d).

Assembly Bill 184 (Chapter 330, Statutes of 2001) amended sections 70(d) and 74.5 of the Revenue and Taxation Code relating to new construction exclusions for certain seismic safety improvements. Specifically, Chapter 330 changed the filing deadlines and modified the definition of “improvements utilizing earthquake hazard mitigation technologies.” This legislation became effective on September 25, 2001.

SEISMIC RETROFITTING IMPROVEMENTS and IMPROVEMENTS UTILIZING EARTHQUAKE HAZARD MITIGATION TECHNOLOGIES (RTC Section 74.5)

Section 74.5(b)(1) defines seismic retrofitting improvements. To exclude these improvements from assessment, they must fit into one of the following classifications:

- Retrofitting or reconstructing to abate falling hazards that pose serious danger
- Structural strengthening
- Improvements resisting seismic force levels during an earthquake to significantly reduce the hazards to life and safety and also provide safe entry and exit during and immediately after an earthquake

Seismic retrofitting also includes those items referenced in Appendix Chapters 5 and 6 of the Uniform Code for Building Conservation (UCBC) of the International Conference of Building Officials. UCBC Appendix Chapter 5 relates to the retrofit of concrete tilt-up buildings and provides requirements for wall anchors and diaphragm cross ties. UCBC Appendix Chapter 6 relates to prescriptive retrofit of residential cripple walls and foundation anchorage and provides prescriptive guidelines for bracing of cripple walls that can be implemented by the homeowner and/or contractor without requiring numerically based structural design.

IMPROVEMENT AMENDMENTS

Chapter 330 amends the definition of improvements utilizing earthquake hazard mitigation technologies in section 74.5(b)(2) to mean improvements to existing buildings identified by a local government as being hazardous to life during an earthquake. Improvements shall involve strategies for earthquake protection of structures and use technologies such as those referenced in Part 2 (commencing with section 101) of Title 24 of the California Building Code and similar seismic provisions in the Uniform Building Code.

Previously the definition of improvements utilizing earthquake hazard mitigation technologies was keyed to certain technologies approved by the State Architect. However, rather than adopting regulations referenced in Health and Safety Code section 16102, the State Architect instead developed guidelines and seismic performance standards to insure the seismic performance of buildings utilizing earthquake hazard mitigation technology.

FILING REQUIREMENTS

- Section 74.5 requires the property owner to notify the assessor prior to, or within 30 days of, completion of the project that the owner intends to claim the exclusion. In addition, all documents needed to support the claim must be filed no later than six months after completion of the project.
- It is the responsibility of the property owner, primary contractor, civil or structural engineer, or architect to certify to the building department those portions of the project that are either seismic retrofitting improvements or improvements utilizing earthquake hazard mitigation technologies.
- Upon completion of the project, the building department is to report to the county assessor the value of those portions of the project meeting either of these definitions.
- If the property changes ownership, the entire property, including the previously excluded new construction, is reappraised at its current full cash value as of the date of transfer. The new construction exclusion is available to the property owner who completes the construction; it is not passed along to subsequent owners.

CLAIM FORM

- Section 74.5(d) requires that the State Board of Equalization prescribe the manner and form for claiming the exclusion. The Board of Equalization has done that with the distribution of the sample form BOE-64, attached to the letter in Further Information below.

FURTHER INFORMATION:

California Revenue and Taxation Code Section 70-74.7

<http://www.leginfo.ca.gov/cgi-bin/displaycode?section=rtc&group=00001-01000&file=70-74.7>

State Board of Equalization Letter to County Assessors: Seismic Safety New Construction Exclusions, revised 2010:

<http://www.boe.ca.gov/proptaxes/pdf/lt10036.pdf>

Two publications that discuss seismic safety improvements, *The Commercial Property Owner's Guide to Earthquake Safety, 2005 Edition* (CSSC Pub. No. 05-01) and *The Homeowner's Guide to Earthquake Safety 2006 Edition* (CSSC Pub. No. 06-02), are available from the Seismic Safety Commission. Both are available in downloadable form or copies may also be purchased.

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The Homeowner's Guide to Earthquake Safety 2006 Edition (CSSC Pub. No. 06-02)

http://www.seismic.ca.gov/pub/CSSC_2005_HOGreduced.pdf

WILLIAMSON ACT PROGRAM

Enacted in 1965, the California Land Conservation Act, commonly referred to as the Williamson Act, allows local governments to enter into voluntary legal contracts (Land Conservation Contract) with private landowners in order to restrict specific parcels of land to agricultural or related open space use. In return, owners will receive lowered property tax assessments because the assessment will be based on farming and open space uses rather than speculative or full market value.

PROGRAM GUIDELINES

- The local jurisdiction creates an Agricultural Preserve with rules and restrictions stating the agricultural use. Only land located within the boundary of a Preserve is eligible for a contract.
- Government code requires that Agricultural Preserves be a minimum of 100 acres. However, more than one contiguous parcel may be combined to form the 100 plus acres and more than one owner may be involved. A smaller plot that cannot be combined but is unique in its agricultural characteristics and its designation is consistent with the general plan may be established as a special Preserve.
- Local planning departments have the application forms and instructions. The minimum term for a contract is 10 years, although a longer length can be agreed upon, and it runs with the land and is binding upon all successors. The contract is automatically renewed every year for the full 10 (or more) years.
- Either the landowner or local jurisdiction can file a notice of non-renewal that starts a nine-year non-renewal period. An owner may object to a local jurisdiction non-renewal filing. At the end of the nine-year process, the contract is terminated. If an owner initiates non-renewal, the property taxes will increase significantly during the first year of the process.

Since January 1, 1995 three principles of compatibility are mandatory in any contract:

- Long-term productive agricultural use and capability will not be compromised
- No impairment or displacement of agricultural activity will occur including harvesting, processing or shipping
- No adjacent contracted land will be removed from agricultural or open-space use

In addition to the Williamson Act, in 1995 the California Legislature passed the Agricultural Land Stewardship Program, now known as the California Farmland Conservancy Program, as an incentive to further protect productive agricultural land from encroaching development. In exchange for conservation easement rights, the owner receives a one-time payment purchasing the difference between development and agricultural value and then also obtains a reduction in property taxes. A local government or non-profit land trust may initiate the program on behalf of the owner.

FURTHER INFORMATION:

Williamson Act:

California Department of Conservation,
Division of Land Resource Protection

<http://www.consrv.ca.gov/DLRP/lca>

California Farmland Conservancy
Program:

California Department of Conservation,
Division of Land Resource Protection

<http://www.consrv.ca.gov/DLRP/cfcp/index.htm>

INTRODUCTION: LOCAL INCENTIVES

Local governments throughout California can preserve and promote their historic and cultural properties by providing financial incentives and removing disincentives to encourage owners to rehabilitate their buildings. Potential incentives include waiving or reducing building permit fees, waivers for zoning and parking requirements, low interest loans, grants, tax breaks, and special assessment districts to generate funds. Policies amenable to preservation could include additional reviews and ascertainment of financing and permits for new construction before demolition permits are granted.

The formation of historic residential districts such as Historic Preservation Overlay Zones (HPOZs) has been proven to create economic value in neighborhoods. Other incentives could include business development zones and incentive zoning mapping. Opportunities for enterprise can include business improvement districts (BIDs), redevelopment project areas, enterprise zones, foreign trade zones, recycling market development zones and renewal community designation.

Community supported historic preservation organizations can be important components in the protection and preservation of their area's architectural legacy and cultural history. These organizations can provide educational programs, tours, lectures and workshops on history, architecture and the benefits of historic preservation. Assistance may be available to help building owners restore their historic properties with consultation and referral services. A neighborhood website may provide area contacts, services, and guidance for preservation, rehabilitation and maintenance projects.

Advocacy to save endangered buildings may include purchasing neglected properties and returning them to productive use. Such programs may involve grant programs for low-income homeowners.

NOTE

Local incentives wanted! Local jurisdictions are welcome to submit their own regulations, ordinances, and any other incentives that promote and preserve historic properties for incorporation into this section. Any submission should include appropriate links. As time and budget allows, this section will be expanded.

FURTHER INFORMATION:

The Getty Conservation Institute, *Incentives for the Preservation and Rehabilitation of Historic Homes in the City of Los Angeles: A Guidebook for Homeowners*, 2004.

http://www.getty.edu/conservation/field_projects/lasurvey/index.html

Los Angeles Conservancy, Incentives for Preserving Historic Buildings:

<http://www.laconservancy.org>

Pasadena Heritage:

<http://www.pasadenaheritage.org/>

San Diego Citywide Business Development and Incentive Zone Map

<http://www.sandiego.gov/economic-development/industry/incentive.shtml>

Northern California Chapter of the Earthquake Engineering Research Institute:

<http://www.eerinc.org/>

ADAPTIVE REUSE ORDINANCES

Planning, zoning and construction incentives can streamline the permitting process and provide flexibility in meeting zoning and building code requirements for adaptive reuse projects that convert underutilized commercial buildings into more productive uses such as loft type residential uses.

potential benefits

- Coordination between city agencies to guide, assist and facilitate the adaptive reuse implementation through a project facilitating team that help the project through design, permitting and construction processes.
- Many non-compliant site conditions such as building height, parking, floor area and setbacks may be permitted without requiring a variance.
- Residential density requirement may be waived.
- Construction guidelines may provide some flexibility in meeting structural and fire and life safety compliance requirements.
- Conversion of existing buildings to privately-owned residential use may not necessarily trigger disabled access requirements in the residential use area, however disabled access would still be required in areas used by employees and that are open to the general public.

eligibility and restrictions

- Eligible areas may be restricted
- Typically all new floor areas, except for mezzanines, must comply with city zoning code
- Average dwelling unit size and minimum size requirements may apply

FURTHER INFORMATION:

City of Los Angeles Adaptive Reuse Ordinance #175588:

http://clkrep.lacity.org/online/docs/2002/02-0177-S1_ORD_175588_12-01-2003.pdf

Los Angeles Conservancy:

<http://www.laconservancy.org>

BUSINESS IMPROVEMENT DISTRICTS

Business Improvement Districts (BIDs) are a type of assessment district in which business owners choose to assess a fee for use in promoting and improving the business area. In California, BIDs date to 1965 with the approval of Assembly Bill 103; The Parking and Business Improvement Area Law. Today there are approximately 200 BIDs in the state. BIDs are one of the most valuable and effective finance tools available to the small business community.

BENEFITS

- BIDs provide a business area with the resources to develop marketing campaigns, increase awareness and lobbying efforts, secure additional funding and enhance public improvement and beautification projects in partnership with a governing body.
- By pooling private resources, business owners in BIDs collectively pay for activities that they could not afford on an individual basis.
- BIDs can consistently enact programs and activities without relying on scarce public funding.
- An organized business community can work more effectively to create positive change and increase support for businesses in the area.
- BIDS can work closely with elected officials and city staff to voice collective concerns, monitor business regulations and obtain funding and support for their business development projects.
- Governing bodies may be able to assist BIDs to improve and diversify the economic base of the districts with market assessments, sales tax revenue assessments, business plans, property owner assistance, retail recruiting, and database collection to measure neighborhood economic activity.

MARKETING ACTIVITIES

BIDs may develop a variety of successful marketing activities that generate business for the district. Activities can include:

- Special events such as restaurant or art gallery tours, block parties, weekly farmers markets and holiday festivals
- Developing public relations and marketing materials
- Use of Internet, coupon books, cooperative advertising campaigns, and district brochures
- Marketing the district to potential businesses in order to reduce vacancies, provide a good mix of businesses, and to strengthen the BID

ADDITIONAL FUNDING

While BID assessments are typically used to leverage funding for a variety of projects, BIDs may also be able to receive additional funding through various local government agencies.

- BIDs may be eligible for matching funds, providing additional return on investment for individual small businesses and the BID as a whole.
- BIDS may be eligible to receive funds from governmental taxes or revenues such as transient occupancy tax or parking meter revenues.
- Corporate sponsorship may be available.
- Local government contributions may include streetscape improvements and redevelopment projects, or programs geared toward assisting individual businesses with matching grants to assist in storefront renovation costs.

FORMING A BID

A BID is typically initiated by local business owners petitioning a local governing body to establish a BID on their behalf. Usually public hearings are held, and a majority of business owners must support the BID.

FEES

The formula for establishing assessment fees is typically determined by the business organization that initiates the BID process. Assessments are usually based on the type, size, and location of the businesses, with assessment levied on the basis of relative benefit from the improvements and activities to be funded.

- The BID fee is a benefit assessment and not a tax
- The fee is collected on an annual basis, and included as a separate charge on the business tax certificate bill
- All assessment funds are returned to the BID through annual contract agreements

FURTHER INFORMATION:

City of San Diego, Economic Development, Small Business Assistance

<https://www.sandiego.gov/economic-development/business/index.shtml>

<https://www.sandiego.gov/economic-development/industry/incentive.shtml>

City of Palo Alto, Economic Development and Redevelopment:

<http://archive.cityofpaloalto.org/business/news/details.asp?NewsID=593&TargetID=9>

PROPERTY-BASED BUSINESS IMPROVEMENT DISTRICT

A Property-Based Business Improvement District (PBID) is one mechanism for a property and business owner collaborative. It is a partnership between the public and private sector organized for the improvement of a specific commercial area. The public sector cannot solve all the problems facing commercial districts today. The private sector must take the initiative.

Characteristics of a PBID

PBID's are formed pursuant to the Property and Business Improvement District Law of 1994 (PBID Law). A PBID is a special benefit assessment district to raise funds within a specific geographic area. Funds are raised through a special assessment on real property.

Property owners determine the level of services and improvements necessary to fit the needs of the commercial area. A PBID may provide:

- Enhanced Security Services
- Enhanced Maintenance Services
- Marketing of the Area and Event Production
- Small Business Training
- Parking Management
- Business Recruitment and Retention
- Advocacy – One Unified Voice Representing the Area

Property owners determine the boundaries of the PBID and how much they are willing to spend to provide the services in the district.

PBID's provide supplemental services, over and above those provided by the city.

To form the district, property owners paying over 50% of the total assessment must sign petitions in support of the district.

A PBID is governed by a private non-profit corporation made up of a majority of property owners. All funds raised are returned to the private non-profit corporation governing the district, which is responsible for managing the district and delivering district services. PBIDS have a defined life, which cannot exceed 5 years pursuant to the PBID Law. Property owner support is required for renewal and the formation process must be followed. A Management District Plan spells out at a minimum the services to be provided, establishes the boundaries, the budget and the term of the district.

The International Downtown Association estimates that there are more than 1200 PBID's throughout North America. Competition is not just between businesses anymore, but between commercial areas as well. PBID's have an impressive track record for improving commercial areas. They have consistently reduced crime, enhanced cleanliness, and improved the business climate in cities throughout the country.

FURTHER INFORMATION:

California Code Part 7: Property and Business Improvement District Law of 1994 [36600 – 36671] <http://codes.lp.findlaw.com/cacode/SHC/1/d18/7>

PLANNING AND ZONING INCENTIVES

Local municipal codes and ordinances can provide incentives to preserving and protecting historic properties within a community. Historic preservation ordinances, planning and zoning variances and exceptions can all recognize the importance of protecting historic resources while providing leeway in modern code requirements and developmental pressures. It should be noted that all qualifying historic properties may implement the alternative measures provided under the California Historical Building Code.

Potential Incentives

- Waiver, reduction, or reasonable alternatives to parking requirements
- Civil penalties to any person or entity who fails to maintain any qualified historic building
- Exclusion of basement and attics from floor area ratio calculations
- Transfer of development rights
- Density or floor area bonuses

Example	
City of Palo Alto Economic Development and Redevelopment <ul style="list-style-type: none">• Density bonus for historic properties contained in Municipal Code	http://archive.cityofpaloalto.org/business/news/details.asp?NewsID=593&TargetID=9
City of Santa Cruz Title 24.12.445, "Variations to regulations for buildings and sites on city Historic Building Survey and contributing buildings within city historic districts"	http://www.codepublishing.com/ca/santacruz/

ADDITIONAL LOCAL INCENTIVES

Historic Preservation Plans

Components of historic preservation plans can provide powerful direction in the approach to preserving and protecting historic properties within a community. Such plans can call for:

- Requiring agencies to give priority consideration to using historic buildings in historic neighborhoods in downtown business areas

Grants

Grants may be available from a number of foundations for neighborhood and community development. A successful grant could potentially fund:

- Assistance to low to moderate income families in acquiring the capital toward home ownership
- Improving residents' lives and upgrading neighborhood conditions
- Financial and technical assistance to qualifying homeowners living in historic homes that need repair
- Workshops on the maintenance of historic properties
- Development of historic context statements, historic property research and documentation, and development of archeological site preservation and management plans
- Creating and strengthening local alliances among organizations committed to affordable housing

<u>EXAMPLES</u>	
Great Valley Center (California Central Valley area), Legaci Grants	http://www.greatvalley.org/legaci/index.aspx
Pasadena Heritage Housing	http://www.heritagehousingpartners.org/
The San Francisco Foundation, the Community Development Program	http://www.sff.org/programs/community-development

Loans

Low interest loans are a great incentive to combat sprawl by encouraging residents to live and invest in their historic neighborhoods. Loans may be used for a variety of home maintenance and rehabilitation projects, provided the changes respect the

building's historic character. Eligible projects may include typical repairs to building features such as roofs, windows and porches; painting; interior work; and potentially additions. Loan amounts and terms may vary. It should be noted that the program may take substantial staff time to operate and monitor.

EXAMPLE	
Cuyahoga County Heritage Home Loan Program (HHLP)	
http://development.cuyahogacounty.us/en-US/housing-development.aspx	
Cleveland Restoration Society Heritage Homes Program:	
http://www.clevelandrestoration.org/homeowner/	

Neighborhood Organizations

Word of mouth is sometimes the best source of finding a good craftsman, contractor or other historic preservation professional. Neighborhood and preservation organizations may be a good source for database lists and technical assistance guidelines and recommendations. Websites may include lists of architects, contractors and other professionals experienced with working on historic properties.

EXAMPLES	
Anaheim Colony	http://www.anaheimcolony.com/
City of San Jose, Historic Preservation	
http://www.sanjoseca.gov/index.aspx?NID=1760	

Preservation Revolving Funds

Preservation revolving funds help to preserve, restore, and maintain buildings and properties of historical and architectural importance within a specific area for the benefit of future generations. A fund empowers an organization to purchase endangered properties, take action to preserve the property, then resell the property, making the proceeds available to save the next building. A fund is a worthy preservation tool that saves historic resources, supports grassroots improvement efforts, enhances the quality of life in communities, and puts an organization in the real estate market with the developer.

PURPOSE

- To preserve buildings, sites and properties of historical or architectural importance.
- To acquire important threatened buildings.
- To enhance the original character and scale of a building through careful rehabilitation while improving livability for modern households and uses.
- To place protective easements, covenants, and legal restrictions on historic properties.
- To restore, lease, option, or resell historic properties.

<u>EXAMPLES</u>	
Save Our Heritage Organization:	www.sohosandiego.org
Others:	
Preservation North Carolina:	http://www.presnc.org/
Historic Boston, Inc.:	http://www.historicboston.org/
Historic Landmarks of Indiana:	http://www.historiclandmarks.org/Resources/Pages/GrantsLoans.aspx

Programs for Low and Moderate Income Homebuyers and Homeowners

Creating affordable housing, revitalizing neighborhoods, and promoting homeownership for low to moderate income families can all benefit historic properties. Potential incentives include assistance in buying and/or rehabilitating an historic home.

<u>EXAMPLES</u>	
The Getty Conservation Institute, <i>Incentives for the Preservation and Rehabilitation of Historic Homes in the City of Los Angeles: A Guidebook for Homeowners</i> , 2004.	
http://www.getty.edu/conservation/publications_resources/pdf_publications/pdf/historic-homes.pdf	

AMERICANS WITH DISABILITIES ACT AND TAX INCENTIVES

With the passage of the American's with Disabilities Act (ADA) in 1990 (PL 101-336), access to properties open to the public is a civil right. Most historical buildings were not designed to be readily accessible for people with disabilities, yet accommodating people with disabilities could jeopardize the significance and integrity of the historic nature of the property. In 1997, this Act was amended to balance accessibility and historic preservation.

The Americans with Disabilities Act requires equal opportunity for persons with disabilities in employment, government programs, telecommunications, transportation, and places of public accommodations, and can be assumed to be all buildings within a downtown commercial district. To the greatest extent possible, historic properties must be made as accessible as non-historic properties.

Two tax incentives are available to businesses to help cover the cost of making access improvements:

DISABLED ACCESS TAX CREDIT (26 USC 44)

- This credit was created in 1990 specifically to help small businesses cover ADA related eligible access expenditures
- This credit cannot be used for new construction. Use is limited for adaptations to existing facilities that are required to comply with ADA
- The amount of the credit is equal to 50% of the eligible access expenditures in a year, up to a maximum expenditure of \$10,250. There is no credit for the first \$250 of expenditures. The maximum tax credit, therefore, is \$5,000.

EXPENDITURES TO REMOVE ARCHITECTURAL AND TRANSPORTATION BARRIERS TO THE HANDICAPPED AND ELDERLY (26 USC 190)

- This deduction was established under Section 190 to help businesses of any size with the removal of architectural or transportation barriers.
- The renovations under Section 190 must comply with applicable accessibility standards (Architectural and Transportation Barriers Compliance Board)
- The amount of the deduction is a maximum of \$15,000 per year.

ELIGIBLE PROJECTS

- The Disabled Access Credit can be used for architectural adaptations, equipment acquisitions, and services such as sign language interpreters. Other eligible expenditures include:
 - provision of readers for customers or employees with visual disabilities
 - provision of sign language interpreters
 - purchase of adaptive equipment

- production of accessible formats of printed materials (i.e., Braille, large print, audio tape, computer diskette)
- removal of architectural barriers in facilities or vehicles (alterations must comply with applicable accessibility standards)
- fees for consulting services (under certain circumstances)
- The Expenditures deduction can be used for architectural or transportation adaptations and include:
 - provisions to make any facility or public transportation vehicle owned or leased by the taxpayer for use in connection with his trade or business more accessible to, and usable by, handicapped and elderly individuals

ELIGIBLE ENTITIES

- The Disabled Access Credit: A business that for the previous tax year had either revenues of \$1,000,000 or less or 30 or fewer full-time workers
- The Expenditures deduction may be used by any business

ADDITIONAL NOTES

- Architectural barriers are physical features that limit or prevent people with disabilities from obtaining the goods or services that are offered. They can include narrow parking spaces, a step or steps to an entrance or sales area of a store, round doorknobs or other hardware difficult to grasp, narrow aisles, high counters, and fixed tables and chairs.
- A tax credit is subtracted from your tax liability after you calculate your taxes, while a tax deduction is subtracted from your total income before taxes, to establish your taxable income.
- Small businesses can use the incentives in combination if the expenditures incurred qualify under both Section 44 and Section 190. For example, a small business that spends \$20,000 for access adaptations may take a tax credit of \$5,000 (based on \$10,250 of expenditures), and a deduction of \$15,000. The deduction is equal to the difference between the total expenditures and the amount of the credit claimed.

Example: A small business' use of both tax credit and tax deduction

\$20,000 cost of access improvements (rest room, ramp, three doorways widened)

-\$5,000 maximum credit

\$15,000 remaining for deduction

- The tax credit and deduction can be used annually. Expenses cannot be carried over from one year to the next and a credit or deduction claimed for the portion that exceeded the expenditure limit the previous year. However, if the amount of the entitled credit exceeds the amount of taxes owed, the unused portion may be forwarded to the following year.
- The disabled access credit is claimed on IRS Form 8826
- For further details and information, these incentives should be reviewed with an accountant or discussed with a local IRS office or the contact below.

PUBLICATIONS

- ADA Guide for Small Businesses
- ADA Tax Incentive Packet for Businesses
- ADA Guide for Small Towns
- The ADA and City Governments: Common Problems
- Common ADA Errors and Omissions in New Construction and Alterations
- NOTE: Access tax pack site below for full listing of available publications

FURTHER INFORMATION:

ADA Home Page

<http://www.usdoj.gov/crt/ada>

ADA Tax Incentives Packet

<http://www.ada.gov/taxincent.htm>

This packet contains information on the disabled credit available for small businesses and the tax deduction available for businesses of any size to help offset costs improving accessibility for customers or employees with disabilities. It also contains IRS forms for claiming the credit, a list of ADA publications available free from the Department of Justice, and a list of telephone numbers and Internet sites for answers to ADA questions.

The established design criteria for the construction and alteration developed by the ADA Access Board are known as the ADA Accessibility Guidelines (ADAAG).

ADAAG

<http://www.ada.gov/adastd94.pdf>

Amendments to CCR Title 24, Part 2

<http://www.dgs.ca.gov/dsa/Programs/progAccess/access2013.aspx>

The Internal Revenue Service provides information about tax code provisions including tax credits (Section 44) and deductions (Section 190) that can assist businesses in complying with the ADA.

Tax code - information about ADA tax incentives

800-829-1040 (voice)
800-829-4059 (TTY)

Tax code - legal questions about ADA tax incentives

202-622-3120 (voice)
TTY: use relay service

To help businesses with their compliance efforts, Congress established a technical assistance program to answer questions about the ADA.

The Department of Justice toll-free ADA Information Line

800-514-0301 (voice)
800-514-0383 (TDD)

GETTY CENTER GRANTS

The Getty Grant Program provides Conservation Grants to provide support for art collections, historic buildings, and archaeological sites. All grants promote the understanding and conservation of the visual arts. Grant category areas include research, conservation, and education and professional development. Since its inception in 1984, the Getty Grant Program has awarded over \$177 million to support over 3,000 projects in more than 150 countries. Matching requirements vary according to the type of grant.

The following grants are available:

- Museum Conservation Grants: Survey and Treatment
- Architectural Conservation Grants; Planning and Implementation
- Special Initiative: Campus Heritage Grants
- Education and Training Grants

Museum Grants are designed to assist institutions in caring for their permanent collections. Survey Grants assist museums in identifying conservation requirements of art collections. Treatment Grants support conservation treatment of works of art of artistic significance. **For further information contact the web site below.**

Architectural Conservation Grants support organizations throughout the world in their efforts to preserve buildings or sites of outstanding architectural, historical, and cultural significance. Planning Grants assist in the initial development of an overall architectural conservation plan. Implementation Grants assist in the actual conservation of a building's historic structure and fabric.

Campus Heritage Grants assist colleges and universities in the United States to plan for the preservation of their significant historic buildings, sites, and landscapes.

Education and Training Grants are available for conservation training programs, museums, and other non-profit organizations to apply for various types of support that contribute to the professional development of conservators. **For further information contact the web site below.**

FURTHER INFORMATION:

The J. Paul Getty Trust

www.getty.edu/grants

Architectural Conservation Planning Grants

Getty Center Grants

- Provide up to \$75,000 for the research, documentation, and analysis for development of a comprehensive conservation plan
- Focus on historic structure and fabric of buildings and conservation issues related to setting

ELIGIBLE PROJECTS

- Funded activities include building condition surveys, use and maintenance planning, existing condition or technical drawing preparation, conservation technique testing and recommendations, budget estimates, comprehensive planning documents such as a conservation master plan or historic structures report
- Training opportunities
- May include temporary stabilization measures or development of archaeological site management plans

ELIGIBLE ENTITIES

Non-profit, charitable organizations. With the owner's approval, other nonprofit organizations involved in the care of the building may also be eligible.

In addition, the building must:

- be owned by a non-profit, charitable, or tax-exempt organization that is committed to its long-term preservation and maintenance;
- be accessible to or used for the benefit of the community; and
- possess the highest available governmental listing of significance available in the country in which it is located

Projects focused primarily on architectural replacement, routine maintenance, commercial reuse, or new construction are not eligible. Funding is not available for completed work or for overhead costs.

TIMING

- April 10 deadline for Architectural Conservation Grants and Campus Heritage Grants

PROCEDURE

- First step in applying is to submit a preliminary letter of inquiry to determine eligibility. For information on the preliminary procedures and the grant process contact the web site below.

FURTHER INFORMATION:

The Getty Grant Program

www.getty.edu/grants

Architectural Conservation Implementation Grants

Getty Center Grants

- Provide up to \$250,000 for the actual conservation of an historic structure and fabric of a building or site
- Grants are intended to serve as models of conservation practice

ELIGIBLE PROJECTS

- Grants are highly selective and eligibility is limited to projects for which planning work has been completed, including a conservation work plan, budget, and technical drawings and specifications
- Projects should include on-site training opportunities for students or professionals in architectural conservation or related disciplines, or for staff involved in ongoing building maintenance and preservation

ELIGIBLE ENTITIES

- Non-profit, charitable organizations. With the owner's approval, other nonprofit organizations involved in the care of the building may also be eligible.

In addition, the building must:

- be owned by a non-profit, charitable, or tax-exempt organization that is committed to its long-term preservation and maintenance;
- be accessible to or used for the benefit of the community; and
- possess the highest available governmental listing of significance available in the country in which it is located

Projects focused primarily on architectural replacement, routine maintenance, commercial reuse, or new construction are not eligible. Funding is not available for completed work or for overhead costs.

TIMING

- April 10 application deadline

PROCEDURE

- First step in applying is to submit a preliminary letter of inquiry to determine eligibility. For information on the preliminary procedures the grant process, and frequently asked questions, contact the web site below.

FURTHER INFORMATION:

The Getty Grant Program

www.getty.edu/grants

Campus Heritage Grants

Getty Center Grants

- Assist U.S. colleges and universities to manage and preserve the integrity of their significant historic buildings, sites, and landscapes

ELIGIBLE PROJECTS

- Focus on campus-wide preservation initiatives
- Historic resources surveys to create comprehensive inventory and to prepare nominations for historic designation for buildings, districts, and landscapes
- Preservation master plans for a campus or to augment an existing master plan with an historic preservation component
- Conservation analyses and working specifications, including documentation for building groupings or landscape, or preparation of historic structure or landscape report

ELIGIBLE ENTITIES

- United States colleges and universities

Projects focused primarily on single buildings or sites, maintenance, reconstruction or replacement, upgrades, and new construction are not eligible.

Majority of grants made for planning activities. Implementation may be available on a limited basis for projects where planning and analysis have already taken place and a work program has already been determined.

TIMING

- April 10 application deadline

PROCEDURE

- First step in applying is to submit a preliminary letter of inquiry to determine eligibility. For information on the preliminary procedures the grant process, and frequently asked questions, contact the web site below.

FURTHER INFORMATION:

The Getty Grant Program

www.getty.edu/grants

National Endowment for the Arts (nea)

GRANTS FOR ARTS PROJECTS

NEA offers grants that facilitate historic preservation through categories that support feasibility studies or historic rehabilitation planning. The following grant information is limited to specific funding for historic preservation activities, please note that each grant also funds other types of activities. Grants are not available for construction or acquisition.

Access to Artistic Excellence

This category offers Standard Review Grants that may be applicable for certain projects related to historic properties. Funded activities can be loosely divided into two areas: Innovation and Stewardship. Grants are generally for over \$10,000.

Innovation refers to activities that are design related and include competitions, commissions, workshops involving new projects, exhibitions of recent work, publications, and conferences or gatherings that promote innovation in design practice.

Stewardship refers to projects that protect, share, or celebrate our collective design heritage and include historic preservation activities, exhibitions and publications of the design of the past, education and outreach, and conferences and gatherings that promote the heritage and conservation of design.

- Funding is not available for construction, purchase, or renovation of facilities.
- Funding is available for predevelopment studies, design fees, and community planning.
- Grants also support events and activities related to cultural festivals, productions, or heritage tourism programs.

Challenge American Fast Track Review Grants

This program offers support to small and mid-sized organizations for projects that promote arts and related programs to underserved populations whose opportunities for art experience may have limits of geography, ethnicity, economics, or disability. Funded activities can be loosely divided into two areas: Arts in Community Development and Professional Arts Programming. Grants are for \$10,000 each.

ARTS IN COMMUNITY DEVELOPMENT ELIGIBLE ACTIVITIES

- Architectural studies, design completions, charettes (design workshops), or feasibility plans for the renovation, restoration, or adaptive reuse of facilities or spaces for cultural activities.
- The revitalization or improvement of cultural districts through lighting, signage, or professionally managed promotional events.
- Festivals, particularly celebrations of local or regional cultural heritage.

- Promotion of arts events or cultural resources through the professional design and distribution of material such as calendars, Web sites, brochures, and souvenir programs. This may include projects that address cultural tourism efforts.
- Professionally directed public art projects such as murals, sculptures, or environmental art.

FURTHER INFORMATION:

National Endowment for the Arts (NEA)

<http://www.nea.gov/grants/apply/artsed.html>

NATIONAL ENDOWMENT FOR THE HUMANITIES (NEH) GRANTS

The National Endowment for the Humanities (NEH) Challenge Grants help institutions and organizations secure long-term improvements in and support for their humanities programs and resources. Eligible entities include any U.S. non-profit such as historical societies and historic sites, museums, public libraries, research institutions, scholarly associations, state humanities councils, colleges and universities, public television, radio stations, and other non-profit organizations. Grants may require significant matching funds.

Grants are most commonly used to establish endowments for ongoing humanities activities such as education, public programming, scholarly research, and preservation programs. Types of activities include faculty and staff positions, lectures or exhibition series, visiting scholars, publishing subventions, consultants, maintenance of facilities, acquisitions and preservation/conservation programs.

Consultation Grants for Museums, Libraries, and Special Projects

This grant program is designed to help groups such as historical organizations, community organizations, museums, and libraries create a new project or develop a new interpretive direction for an institution. Grants are up to \$10,000.

Projects should convey significant humanities ideas to the public, use creative formats to engage an audience, examine ideas and topics within a regional or national context and expand their impact and mission by involving new audiences or by serving as models to other organizations.

ELIGIBLE ACTIVITIES

- Historical organizations and museums projects that create interpretive exhibitions, interpret a historic site, and produce catalogs, public symposia and web sites to support the interpretation program.
- Libraries and archives projects that make collections accessible through reading or film discussion series, traveling exhibits, lectures, and public symposia. Curriculum materials, brochures, and websites are permissible support items for funding.
- Special projects that are usually sponsored by other groups than the above organizations. These are envisioned to be broad, inter-disciplinary formats to reach a regional or national audience at diverse venues and locales. Components may include a discussion series, lectures, or symposia, as well as related exhibits, publications, brochures or websites.

Implementation Grants for Museums and Historical Organizations

Similar to the consultation grants, this program supports the realization of long-term exhibits, historic site interpretation, and supporting materials such as symposia, publications, websites, and related programming. Grants are up to \$350,000.

Projects include final consultation with scholars or professional experts, final exhibit design, exhibit fabrication, crating and shipping, website development, publicity costs, public program presentation costs, and audience evaluation.

Preservation Assistance Grants

This grant program assists small and mid-sized institutions such as historical societies, museums, libraries, archival repositories, town and county records offices, smaller departments within colleges and universities, and other similar organizations, to improve their capability to care for their humanity-related collections. Such collections may consist of architectural and cartographic records, archeological and ethnographic artifacts, historical objects, decorative and fine arts, furniture, textiles, archives and manuscripts, books and journals, prints and photographs, moving images, and sound recordings.

Applicants must consult with specialists whose preservation and conservation skills and experiences are related to the types of collections and activities that are the focus of their projects.

ELIGIBLE ACTIVITIES

- Assessment and recommendations reports for management and collection needs
- Disaster preparedness and response plans
- Environmental monitoring programs, pest management, security or fire protection
- Lighting and storage studies
- Assessing conservation treatments for selected collection items and materials
- Permanent storage furniture and supplies, and monitoring equipment

We the People Challenge Grants in United States History, Institutions and Culture

To help Americans make sense of their history and the world around them, NEH has created an initiative “We the People,” which encourages exploration of significant events and themes in our Nation’s history and culture and which advances knowledge of the underlying principles that define America in their full historical and institutional context.

Support may be provided for strategic planning to improve a program by items for:

- Construction, renovation, and maintenance
- Preservation and conservation programs
- Acquisition of materials and equipment
- Direct expenditures through long-term depleting or bridging funds
- Establishing endowments which generate expendable earnings for program activities

FURTHER INFORMATION:

National Endowment for the Humanities (NEH) <http://www.neh.gov/grants/guidelines/challenge.html>

NATIONAL TRUST FOR HISTORIC PRESERVATION

The National Trust for Historic Preservation (NTHP) provides leadership, education, advocacy and resources to save America's diverse historic places and revitalize communities. Support for the National Trust is provided by membership dues, endowment funds, contributions, and grants.

COMMUNITY PARTNERS

Community Partners assists preservation organizations, local governments and community development corporations in revitalizing historic properties, central business districts and urban neighborhoods.

- National Main Street Center
- National Trust Loan Funds
- Preservation Development Initiative
- Banc of America Historic Tax Credit Fund
- National Trust Small Deal Fund

FORUM

- Cynthia Woods Mitchell Fund
- Johanna Favrot Fund
- National Trust Preservation Funds

ADDITIONAL NTHP RESOURCES

- Preservation Resources Division

FURTHER INFORMATION:

National Trust for Historic Preservation <http://www.preservationnation.org/resources/find-funding/>

The Trust's regional offices bring programs and tools of the National Trust to local communities. They offer technical assistance through consultations, field visits and financial assistance, primarily through small grants to help jump start local efforts. They convene educational preservation programs, and work to foster preservation-friendly public policies that affect historic places. They also provide leadership on issues that concern their particular region.

NTHP San Francisco Field Office:

<http://www.preservationnation.org/contacts/field-offices/san-francisco.html>

National Main Street Center

National Trust for Historic Preservation

The National Trust's Main Street Center offers a variety of consulting services that help communities identify revitalization issues and solutions and build or fine-tune local efforts. These services include basic and advanced training, analysis and consultation on a wide range of commercial district revitalization topics—all customized to local needs and resources.

The Center can assist your district with a comprehensive range of commercial district revitalization issues, including the following:

- Organizational Development
- Planning
- Business Retention/Recruitment
- Property Development
- Appearance of the District
- Transportation Planning
- Small Business Assistance
- Parking
- Funding for Revitalization
- Market Analysis
- Market-Driven Promotions

California Main Street Association (CAMSA)

In 1986, California joined a growing national movement to improve the quality of life in America's towns, cities and neighborhoods by reinvigorating the economic health of their historic Main Street central business districts. Developed by the National Trust for Historic Preservation more than 25 years ago and administered by the non-profit National Main Street Center of the National Trust for Historic Preservation, the Main Street Program has utilized a public-private partnership of private investment, local government support, and local non-profit assistance to revitalize historic commercial districts. The locally-driven, grass roots, self-help "Main Street Approach" focuses on four points: organization, promotion, design, and economic restructuring.

FURTHER INFORMATION:

National Main Street Center
CAMSA

<http://www.mainstreet.org>
http://www.ohp.parks.ca.gov/?page_id=23484

National Trust Loan Funds (NTLF)

National Trust for Historic Preservation

NTLF had a 30-year record of lending to low-income historic districts and to specific endangered historic resources. The program consisted of two preservation revolving funds. Combined asset base of these Funds had grown since 1994 from approximately \$4 million to a total of \$10 million.

The Loan Fund program has been discontinued by the National Trust. For a list of projects that were funded by the loan program, see the web page below.

FURTHER INFORMATION:

National Trust for Historic Places:

<http://www.preservationnation.org/resources/case-studies/loan-funds/>

Preservation Development Initiative

National Trust for Historic Preservation

Sources of Funding

This program combines a comprehensive approach to preservation-based economic revitalization. PDI helps targeted city governments assess, develop, and realize the full economic potential of their historic sites, landmarks and districts. The breadth of historic preservation resources and opportunities is first identified through a comprehensive assessment. Cities then set priorities for follow-up program assistance from the National Trust's Main Street, Community Partners, Regional Office and Heritage Tourism programs. This may include, for instance, providing matching grants to create a historic real estate revolving fund or organizing a city-wide Main Street program.

To support economic and community development through historic preservation, the PDI office:

- Designs 'packages' of comprehensive technical and financial services for client communities;
- Develops preservation-based economic development strategies, financial incentive programs, and preservation development demonstration projects;
- Uses the broad array of National Trust expertise in interdisciplinary teams and programs; and
- Builds strategic partnerships.

FURTHER INFORMATION:

National Trust for Historic Preservation-Preservation Development Initiative Report:

http://www.preservationnation.org/resources/technical-assistance/PDI_portfolio.pdf

National Trust for Historic Preservation:

<http://www.preservationnation.org/>

National Trust for Historic Preservation Funds Application:

<http://www.preservationnation.org/resources/find-funding/>

Tax Credit Equity Investments

National Trust for Historic Preservation

National Trust Community Investment Corporation

This fund is a partnership between the National Trust and financial partners which is managed by a subsidiary of the Trust that provides tax credit equity to for-profit and non-profit developers rehabilitating historic properties as well as New Markets Tax Credits. The Fund offers the National Trust's expertise in historic preservation, combined with the resources and financial strength of various financial institutions. It is managed by the National Trust Community Investment Corporation, a for-profit subsidiary of the National Trust. The fund:

- Invests in projects eligible for the Federal and state historic rehabilitation tax credit.

ELIGIBLE PROJECTS

- Buildings listed, or eligible for listing, in the National Register of Historic Places
- Rehabilitations having National Park Service approved Parts 1, 2 (prior to investment), and 3 (upon project completion) of the Historic Preservation Certification Application
- Non-historic, non-residential buildings built before 1936

ELIGIBLE USES

- Multi-family rental housing
- Office and retail
- Mixed-use
- Special purpose buildings (performing arts facilities, museums, schools, community centers)

CREATING THE PARTNERSHIP

Call or email the National Trust to discuss your project with an acquisitions manager, including such items as:

- Support of local historic preservation organizations, the community, and public officials
- Development team and their experience with rehabilitation tax credits projects
- Development budget and sources of financing

The National Trust Community Investment Corporation offers competitive pricing, flexible pay-in and reasonable deal terms and structuring. Developers also have access to Bank of America's full line of debt and equity products, as well as the nationwide resources of the National Trust.

FURTHER INFORMATION:

The NTCIC funds website also contains a rehabilitation tax credit guide, and an interactive, online tutorial on qualifying, earning and redeeming the 10% and 20% rehabilitation tax credits.

National Trust Community Investment Corporation:

www.ntcicfunds.com

NTHP acquisitions manager email for inquiries:

Community_partners@nthp.org

Tax Credit Equity Investments

National Trust for Historic Preservation

National Trust Small Deal Fund

Is a partnership between Tax Credit Capital and a subsidiary of National Trust for Historic Preservation designed to help developers of historic properties that generate an equity investment of less than \$650,000 (total project costs of approximately \$4 million or less). The Fund operates on the belief that the most efficient way to get these smaller transactions done is to use a standard deal template. Using a set pay-in structure, standard documentation, and streamlined due diligence process, the Fund's closing costs are nominal (\$10,000). Developers are responsible for their own counsel, and are strongly encouraged to use counsel with tax credit experience.

The National Trust Small Deal Fund pays up to \$.89/\$1.00 of credits it receives. The equity is paid in installments. A nominal (\$100) contribution is made at closing, 85% is paid upon receipt of a Part III from the National Park Service, and the remaining 15% (less the initial \$100) is paid in at 6 months of breakeven operations.

FURTHER INFORMATION:

National Trust for Historic Preservation Small Deal Funds:

<http://ntcicfunds.com/services/developer/small-deal-fund/>

Cynthia Woods Mitchell Fund

National Trust for Historic Preservation Forum

NOTE: National Trust Forum membership is required in order to receive a grant.

Fund purpose is to assist in the preservation, restoration, and interpretation of historic interiors. Grants range from \$2,500 to \$10,000. It is anticipated that total grants of \$50,000 per year will be made. With rare exception, grants require a dollar-for-dollar match.

ELIGIBLE PROJECTS

- Consultant services with expertise in architecture, planning, paint analysis, archeology, fund raising, media relations, education, or graphic design
- Professional advice to strengthen management capabilities
- Designing, producing and marketing print and video communications materials
- Sponsoring preservation conferences and workshops
- Designing and implementing innovative preservation education programs

Acquisition of real property or objects, staff salaries, overhead costs, construction or other capital improvement costs, expenses incurred prior to the award date, and bricks and mortar construction, repair, and rehabilitation are not eligible.

ELIGIBLE ENTITIES

- Non-profit organizations
- Government agencies
- Individuals and for-profit businesses if the project involves a National Historic Landmark

SELECTION CRITERIA

- Historic significance of the property
- Extent to which the requested assistance will act as seed money to make a difference in preserving, restoring or interpreting the historic interior, including what other funds might be leveraged by an award
- Effort which owners and local supporters are willing to commit to the project
- Potential of project to be a catalyst for further positive action to benefit other historic interiors, properties, neighborhoods, or communities
- Adequacy of plans for the future maintenance of the property or the continuation of the activity for which grant support is requested
- Ability and willingness of applicant to carry out proposed plans or activities

TIMING

- One funding round each year. Applications must be postmarked by February 1.

FURTHER INFORMATION:

Cynthia Woods Mitchell Fund:

<http://www.preservationnation.org/resources/find-funding/special-funds/cynthia-woods-mitchell.html>

Johanna Favrot Fund

National Trust for Historic Preservation Forum

NOTE: National Trust Forum Membership is required in order to receive a grant.

Fund purpose is to save historic environments in order to foster appreciation of the nation's diverse cultural heritage and to preserve and revitalize the livability of the nation's communities. Grants range from \$2,500 to \$10,000. It is anticipated that total grants of \$50,000 per year will be made. Grants require a dollar-for-dollar match.

ELIGIBLE PROJECTS

- Consultant services with expertise in architecture, planning, economics, archeology, fund raising, media relations, education, or graphic design
- Professional advice to strengthen management capabilities
- Designing producing and marketing print and video communications materials
- Sponsoring preservation conferences and workshops
- Designing and implementing innovative preservation education programs

Acquisition of real property or objects, staff salaries, overhead costs, construction or other capital improvement costs, expenses incurred prior to the award date, and bricks and mortar construction, repair, and rehabilitation are not eligible.

ELIGIBLE ENTITIES

- Non-profit organizations
- Government agencies
- Individuals and for-profit businesses if the project involves a National Historic Landmark

SELECTION CRITERIA

- Historic significance of the property, and the present or potential charm of the property, neighborhood, or community
- Extent to which the requested assistance will act as seed money to make a difference in preserving or rehabilitating an historic property, including what other funds might be leveraged by an award
- Effort which owners and local supporters are willing to commit to the project
- Potential of project to be a catalyst for further positive action to benefit other adjacent historic properties, neighborhoods, communities, or open space
- Adequacy of plans for the future maintenance of the property or the continuation of the activity for which grant support is requested
- Ability and willingness of applicant to carry out proposed plans or activities

TIMING

- One funding round each year. Applications must be postmarked by February 1.

FURTHER INFORMATION:

Johanna Favrot Fund:

<http://www.preservationnation.org/resources/find-funding/special-funds/johanna-favrot-fund.html>

National Trust Preservation Funds

National Trust for Historic Preservation Forum

NOTE: National Trust Forum Membership is required in order to receive a grant.

Fund purpose is to encourage preservation at the local level by providing seed money for preservation projects. Grants help stimulate public discussion, enable local groups to gain technical expertise needed for particular projects, introduce the public to preservation concepts and techniques, and encourage financial participation by the private sector. Grants range from \$2500 to \$5,000. It is anticipated that total grants of \$50,000 per year will be made. Grants require a dollar-for-dollar match.

- Applications must be mailed to the appropriate National Trust regional office.
- Applicants must contact their regional offices to discuss the project before applying.

ELIGIBLE PROJECTS

Planning: Support for obtaining professional expertise in architecture, archeology, engineering, preservation planning, land-use planning, fund raising, organizational development and law.

- Hiring a preservation architect or landscape architect to produce an historic structures report or landscape master plan
- Hiring a preservation planner to produce design guidelines for an historic district
- Hiring an organizational development consultant to facilitate a strategic planning retreat for a preservation non-profit
- Hiring a real estate development consultant to develop an economic feasibility study for the reuse of a threatened structure
- Hiring a fund raising consultant to develop a capital campaign for a building rehabilitation
- Sponsoring a community forum to develop a shared vision for the future of an historic neighborhood

Education and Outreach: Support for preservation education activities to educate the public.

- Sponsoring a workshop on the preservation of burial grounds or cultural landscapes
- Underwriting travel costs or honoraria for a keynote speaker at a statewide preservation conference
- Preparing a manual on the use of transportation enhancement funds for preservation projects
- Developing curriculum on ethnic heritage of school children
- Hiring a media relations consultant to develop a media campaign for an endangered properties list

Acquisition of real property or objects, academic research, historic resource surveys, and building or other construction activities are not eligible.

ELIGIBLE ENTITIES

- Non-profit incorporated organizations or public agencies
- Capable of matching the grant amount dollar-for-dollar

ELIGIBLE SOURCES OF MATCHING FUNDS

- Cash contributions from private or public sources
- Earned income from registration fees or fund raising activities

Staff salaries and organizational overhead costs are not eligible.

SELECTION CRITERIA

- Critical and urgent need
- Uniqueness and significance
- Timetable
- Personnel qualifications
- Budget, Match, and Support
- Long Term Results
- Effects on other local preservation activities

CONDITIONS

- Grantees must be National Trust Forum members
- Consultants must be approved by the National Trust before grants funds are disbursed
- At least three competitive bids must be obtained for any procurement of services that exceeds \$10,000
- Applicants must agree not to discriminate against any employee or applicant for employment because of race, color, religion, sex, age, national origin or sexual orientation
- Grant recipients must include acknowledgement of National Trust financial support in all printed materials generated for the project
- All preservation work must conform to the Secretary of the Interior's Standards
- PSF grants or matching funds cannot be used to influence a member of Congress to favor or oppose any legislation or appropriation
- All work supported by previous PSF awards must have been satisfactorily completed and a final report and financial accounting of the grant approved.

TIMING

- Contact the National Trust to obtain information regarding application deadlines

FURTHER INFORMATION:

National Trust Preservation Funds:

<http://www.preservationnation.org/resources/find-funding/preservation-funds-guidelines-eligibility.html>

Additional Programs

National Trust for Historic Preservation

- **PRESERVATION LEADERSHIP FORUM:**
<http://www.preservationnation.org/leadership-forum.html>
- **PRESERVATION LEADERSHIP TRAINING:**
<http://www.preservationnation.org/resources/training/plf/>
- **NATIONAL TRUST CONFERENCES AND TRAINING:**
<http://www.preservationnation.org/resources/training/>
 - Mission to strengthen and support a network of committed and informed preservation leaders by providing the tools and resources needed to carry out preservation activities in their own communities
 - Training is provided to increase the capacity of organizations and agencies working in the field of historic preservation
 - Programs include Preservation Leadership Training and the Better Boards workshop
- **HERITAGE TOURISM:**
<http://www.preservationnation.org/information-center/economics-of-revitalization/heritage-tourism/>
 - The National Trust Heritage Tourism Program is a fee-for-service consultation that offers a network of partners and resources
 - Assists in assessing resources and creating plans for sustainable heritage tourism programs
 - Provides a national awareness and advocacy role
- **PRESERVATION DEVELOPMENT INITIATIVE REPORT:**
http://www.preservationnation.org/resources/technical-assistance/PDI_portfolio.pdf
 - **PDI will help local leaders make preservation a central part of their community's broader economic and community development strategy**
 - Grant recipients will receive a range of assistance, including a comprehensive preservation development strategy
 - Organizational capacity building, commercial revitalization programming, residential redevelopment and heritage tourism are a few areas where the PDI can help
- **RURAL HERITAGE DEVELOPMENT INITIATIVE:**
<http://www.preservationnation.org/information-center/saving-a-place/rural-heritage/rural-heritage-development-initiative/rural-heritage-development.html>
 - Funded program by the National Trust, the W. K. Kellogg Foundation and local partners, the RHDI is dedicated to the recognition and protection of rural historic and cultural resources
 - Supports efforts of rural communities through educational programs, publications, and technical assistance
 - Provides both fee and no-fee services

- **YOUR TOWN DESIGN WORKSHOPS**

www.yourtowndesign.org/

- Leadership initiative, developed by the National Trust and the National Endowment for the Arts, that responds to the design need of small towns and rural areas
- Addresses issues of community integrity and character through process of design in a participatory workshop

PARTNERS FOR SACRED PLACES (PARTNERS)

National Center for the Stewardship and Preservation of Historic Religious Properties

NOTE: No direct grants or funding is available from the Partners but they actively encourage development of fund-raising skills.

Partners is the only non-sectarian, national non-profit organization that is dedicated to assisting communities and their congregations retain and actively use historic and older sacred properties. It is also dedicated to promoting an understanding of how sacred places can sustain communities. Assistance includes an information clearing house, a publication center, professional referrals, and training workshops that explain how to promote your property for community support and fund raising.

- Founded in 1989 by a national task force of religious, historic preservation and philanthropic leaders. Has served over 100,000 locally based sacred places across the nation.
- In 1998, published the landmark study *Sacred Places at Risk*, which defines for the first time the pattern and intensity of community service programs operating in aging and culturally valued religious buildings.

This study has further defined the focus of the Partners program:

- 90% or more of older congregations share their facilities with the larger community
- 80% of beneficiaries are non-members of the congregation
- More than 75% of congregations use their own facilities to house outreach programs
- These facilities face hundreds of thousands of dollars in deferred maintenance and repairs for roofs or other structural problems that put the existing buildings and programs at risk

PROGRAM ASSISTANCE

- **Information Clearinghouse** is a unique, broad-ranged resource that makes available over 8000 sources on 250 different subject categories focused on the care and use of older sacred places.
- **Sacred Places Toolkit** is a compilation of workbooks, case studies, video, and web-based programs that assist congregations in defining their “public value” and describing it to policymakers, funders and other community partners.
- ***Open the Doors, See All the People: A Guide to Serving Families in Sacred Places*** explains creative ways to focus on providing services to children and families.
- **Sacred Trusts Conference** is a national conference with an audience of clergy, lay leaders, preservationists, community leaders and policymakers to discuss both care of buildings and outreach programs.
- **Advocacy Initiatives** actively carries the message of **Sacred Places at Risk** to civic leaders, funders, and policymakers to encourage creative ways to adopt broad support for older religious properties.

FURTHER INFORMATION:

Partners for Sacred Places:

<http://www.sacredplaces.org/>

SAVE AMERICA'S TREASURES

Save America's Treasures is a public-private partnership between the National Park Service and the National Trust for Historic Preservation dedicated to identifying and rescuing the enduring symbols of American tradition that define the nation. Grants are administered by NPS in partnership with the National Endowment for the Arts, the National Endowment for the Humanities, the Institute of Museum and Library Services, and the President's Committee on the Arts and Humanities. Grants are awarded through a competitive process.

Grants require a dollar-for-dollar non-federal match, which can be cash or donated services. The grant and match must be used during the grant period to execute the project. The minimum grant request for collections projects is \$50,000, the minimum grant request for historic property projects is \$250,000. Maximum grant request for all projects is \$1 million.

ABOUT THE PARTNERSHIP

- The National Trust for Historic Preservation works to help official projects of SAT encourage local preservation efforts, and attract gifts to support community projects
- The National Endowment for the Arts pre-reviews applications for collections, artworks, and monuments and administers the arts-related grants
- The General Services Administration assists the NPS in initial application review and coordinating the expert panel
- All partners offer technical assistance and advice about the program

ELIGIBLE PROJECTS

Preservation and/or conservation work on nationally significant intellectual and cultural artifacts and nationally significant historic structures and sites. Intellectual and cultural artifacts include artifacts, collections, documents, sculpture and works of art. Historic structures and sites include historic districts, sites, buildings, structures and objects.

- A structure or building must be listed or considered eligible by the SHPO for listing on the National Register of Historic Places at the national level of significance.

ELIGIBLE ENTITIES

- Federal Agencies funded by the Department of the Interior and Related Agencies Appropriations Act
- Non-profit, tax-exempt 501(c) U.S. organizations
- Units of state or local government
- Federally recognized Indian Tribes
- Other federal agencies collaborating with a non-profit partner to preserve the historic properties or collections owned by the federal agency may submit applications through the non-profit partner
- Historic properties and collections associated with active religious organizations provided they meet the Grant Selection Criteria

Acquisition, surveys, inventories, cataloging, maintenance, curatorial work beyond the grant period, interpretive or training programs, reconstruction, moving buildings, new construction, and historic structures reports and condition assessments not part of a larger project, cash reserves, endowments, revolving funds, fund raising, work completed prior to announcement of the award are not eligible. Federal salaries, agency overhead or administrative costs for federal agency grantees are not eligible.

SELECTION CRITERIA

- Collections or historic properties must be nationally significant
- Collections or historic properties must be threatened, endangered or otherwise demonstrate an urgent preservation and/or conservation need
- Projects must address the threat and must have a clear public benefit
- Projects must be feasible, and the applicant must demonstrate ability to complete the project and match the federal funds

TIMING

- Application materials for the each grant cycle are available at the beginning of each year.

FURTHER INFORMATION:

NPS Save America's Treasures Information <http://www.nps.gov/history/hps/treasures/>
 List of Save America's Treasures CA projects:
<http://www.nps.gov/state/ca/list.htm?program=parks,9F930D5E-155D-4519-3E48DF37EBF81B52>

Save America's Treasures Official Project list for California (Since January, 2001)	
1894 Carmel Fallon Building	San Francisco
Alcatraz Island Gardens	San Francisco
Amargosa Opera House and Hotel	Death Valley Junction
Angel Island Immigration Station	San Francisco
Anthropology Audio Visual Collection	Berkeley
Anthropology Collection, Santa Barbara Museum of Natural History	Santa Barbara
Bodie Historic Mining District	Bridgeport
Breed Street Shul (Congregation Talmud Torah)	Los Angeles
Bullocks Wilshire Building	Los Angeles
Calexico Carnegie Library	Calexico

Calfax Depot	Calfax
Campo de Cahuenga	North Hollywood
Captain Fletcher's Inn	Elk
Casa de Dana	San Luis Obispo
Casa Grande	Santa Clara Co.
Charles Connick's Stained Glass Windows, Grace Cathedral	San Francisco
Conservatory of Flowers	San Francisco
Cooper-Molera Adobe	Monterey
The Doheny Mansion	Los Angeles
Dr. John Marsh Stone House	Brentwood
The Ebell of Los Angeles, Historic Women's Club	Los Angeles
El Garces Train Depot	Needles
Emporium Building	San Francisco
Ennis-Brown House	Los Angeles
Estudillo Mansion	San Jacinto
Ferryboat <i>Berkeley</i>	San Diego
First Church of Christ, Scientist	Berkeley
Fox Theater	Stockton
Fremont Adobe	Monterey
Gamble House	Pasadena
Grabhorn Institute for the Printing Arts	San Francisco

Great Stone Church Monument, Mission San Juan Capistrano	San Juan Capistrano
Hearst Metronome Newsreel Collection	Hollywood
History of New American Music Preservation Project	Berkeley
Kelley House Museum	Mendocino
Keystone-Mast Stereographic Collection	Riverside
Knight Foundry Historic Water-Powered Iron Works	Sutter Creek
Leo Carillo Ranch	Carlsbad
Locke Historic Building House	Locke
Lopez Adobe	San Fernando
Manzanar Internment Camp Perimeter Fence, Manzanar National Historic Site	Independence
Maritime History Center of Working Families	Richmond
Mendocino Woodlands State Park	Mendocino
Mission San Luis Rey	Oceanside
Mission San Miguel	San Miguel
Monterey Jazz Festival Audio Collection	Stanford
Murray Schoolhouse	Dublin
Pasadena Playhouse State Theatre of California	Pasadena
Old Mint	San Francisco
Oroville Historic Site Theatre	Oroville
Peralta Hacienda Historical Park	Oakland
Pier 1, San Francisco Port of Embarkation, Golden Gate National Recreation Area	San Francisco
Plaza House and Vickrey-Brunswig Complex	Los Angeles
Rancho Los Cerritos Master Plan	Long Beach
R. Buckminster Fuller Recordings at Stanford University	Stanford
Rios Caledonia Adobe	San Miguel
SS <i>Jeremiah O'Brien</i>	San Francisco

San Diego Museum of Man	San Diego
San Francisco Examiner Photo Archive	San Francisco
Shafter Research Center	Shafter
Southwest Museum of the American Indian Collection	Los Angeles
Tachi-Yokut History and Cultural Center	Coalinga
Thomas Hansford William House, Gold Discovery Park Association	Coloma
Touro University School of Nursing	Vallejo
Tule Lake Interment Camp	Tule Lake
U.S. Borax Company Headquarters	San Francisco
<i>USS Hornet</i>	Alameda
Walker-Eisen Building	Los Angeles
Western Philatelic Library Stamp Collection	San Francisco
Whelan Ranch House and Barn	Oceanside

THE 1772 FOUNDATION

Stewart B. Kean Foundation

The 1772 Foundation is named for its initial project, which was to restore the 23-acre Livingston/Kean Family estate as a museum in Union, New Jersey. Its Mission is to preserve and enhance American historical structures for generations to enjoy, with particular interest in farming, industrial development, transportation, and unusual historical buildings.

ELIGIBILITY

- **Applications from anywhere in the United States will be accepted.**
- Strong local support is a prerequisite for funding, and those organizations that have obtained matching funds are most favorably considered.
- No grants will be made to schools or churches, or for operating expenses, management fees, or professional fees.

SELECTION CRITERIA

In the interest of providing a prompt feedback on projects, the 1772 Foundation requires submission of a one-page letter of inquiry e-mailed from their web-site. The letter should include:

- A synopsis of the proposed project,
- A brief history of the site,
- A clear statement of funding needs.

Letters are reviewed throughout the year. Projects that appear to be a good match to the Foundation's mission and funding availability will be invited to submit a full application.

Previously funded projects include the U.S. Lighthouse Society in San Francisco, the Chamberlain Observatory in Colorado, the Brayton Grist Mill in Connecticut, the Willard Clock Museum in Massachusetts, the Battleship New Jersey in Middleton, and the Museum of the American West in Wyoming.

FURTHER INFORMATION:

The 1772 Foundation

<http://www.1772foundation.org>

CALIFORNIA HISTORICAL BUILDING CODE (2010)

The purpose of the California Historical Building Code (CHBC) is to provide regulations for the preservation, restoration, rehabilitation, relocation or reconstruction of qualified historic buildings or properties. These regulations are intended to facilitate alternative solutions for such historic buildings or properties so as to preserve their original or restored architectural elements and features. At the same time, it provides for the safety of occupants, for the reasonable accommodation of people with disabilities, for a cost-effective approach to preservation, and for reasonable accommodation to the need for energy conservation.

- A "qualified historical building" is defined as any building, site, structure, object, district or collection of structures, and their associated sites, deemed of importance to the history, architecture or culture of an area by an appropriate local, state or federal government jurisdiction.

As defined in its purpose, the CHBC is a source of incentives for the preservation of a community's historic resources. And while these provisions are intended to maximize the protection and preservation of these resources, they also translate into cost-effectiveness:

- The "triggers" for full upgrading to current standards, with respect to length of vacancy, change of occupancy, or percentage of value of the work proposed, and which exist in other codes, are not recognized by the CHBC, which concentrates instead on the preservation-sensitive resolution of genuine safety considerations.
- Structural/Seismic upgrading issues are governed by the CHBC, permitting design based on real values of archaic materials, and solutions based on engineering principles and professional judgement, rather than solutions limited to codified prescriptive formulas. This flexibility usually translates into a higher degree of retention of historic fabric.
- Because most qualified historical buildings cannot conform to California's energy standards without the alteration or loss of historic features, they are categorically exempt from those standards. To the degree practicable, new construction associated with the historic resource should conform.
- With respect to qualified historical buildings, both ADA and the CHBC make provisions for reasonable levels of equivalency for, and under special circumstances exemption from, accessibility mandates.

The CHBC is the governing code for all qualified historical buildings, and is applicable in every jurisdiction. Responsibility for the CHBC resides within the statutorily established State Historical Building Safety Board (SHBSB). It is comprised of 21 members from the entire spectrum of the public, private and non-profit sectors related to the issue of historic buildings and is established to recommend rules and regulations associated with the CHBC and to hear appeals.

The CHBC is published as Chapter 34, Division II of the California Building Code. However it is a "stand-alone" document: Part 8 of Title 24 of the California Code of Regulations, undergirded by Statute (Health & Safety Code 18950-18961, cited as the

"State Historical Building Code"), and enacted into law by the California Legislature in 1975.

ACCESS AND HISTORIC RESOURCES

The protection and preservation of the Nation's cultural legacy is, like accessibility mandates, a reflection of the will of the people of the nation and the state. The ADA acknowledges the value of historic resources, and only for them does it make exceptions to its mandates. Recognizing this dual responsibility, we as a society are properly committed to provide the highest degree of accessibility for people with disabilities that can be reasonably achieved without peril to our historic resources.

The latitude provided by the Americans with Disabilities Act (ADA) and the California Historical Building Code (CHBC) provides guidance as to reasonable solutions on a case-by-case basis. This case-by-case approach both requires and permits us, within established parameters, to make modifications to facilitate people with disabilities, providing reasonable levels of equivalency where the letter of the law would exact too high a toll of the historic resource.

Compromises are something which must be accepted by ardent defenders of both accessibility and preservation; with the understanding that, while the "desires" of neither may be fully attainable, the "needs" of both usually are. The "Accessibility" section of the CHBC (Section 8-6) has been found, thus far, to be a reasonable exposition of the requirements of ADA. Use of the CHBC, especially when coupled with input from the local community of people with disabilities, has provided the foundation for successfully meshing the mandates for both preservation and accessibility.

FURTHER INFORMATION:

Division of the State Architect
Building Standards Commission
SHBSB

<http://www.dgs.ca.gov/dsa/Home.aspx>
www.bsc.ca.gov
<http://www.dgs.ca.gov/dsa/AboutUs/shbsb.aspx>

APPENDIX A

How to complete a successful tax credit project application

Click on link below for current document

[Completing a Successful Tax Credit Project Application](#)

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ATTACHMENT
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December 18, 2020

VIA EMAIL bradley.furuya@lacity.org;
vince.bertoni@lacity.org;
holly.wolcott@lacity.org

Bradley Furuya
Los Angeles Department of City Planning
221 N. Figueroa St., Room 1350
Los Angeles, CA 90012

Re: Comments on the Notice of Preparation of an EIR for
ENV-2019-6645-EIR; SCH 2020110264 (previously, SCH: 2020110210);
11973 San Vicente Boulevard Project

Dear Mr. Furuya:

I. INTRODUCTION AND PRELIMINARY OBSERVATIONS.

This firm and the undersigned represent concerned neighbors and interested stakeholders in the community. Please keep this office on the list of interested persons to receive timely notice of all hearings, votes and determinations related to the proposed approval of the 11973 San Vicente Boulevard Project ("Project").

Pursuant to Public Resources Code Section 21167(f) and other applicable laws, please provide a copy of each and every notice issued by the City in connection with this Project. We adopt and incorporate by reference all Project comments and objections raised by all others during the environmental review and land use entitlement processes for the Project.

The Project as presented in the November 18, 2020 Notice of Preparation (NOP) is only part of the larger project as presented in the 2012 EIR for the **Green Hollow Square Project**, Case No. ENV-2009-1065-EIR, which included demolition at and grading of several parcels: 11961, 11965, 11969, 11973, 11977, 11981 and 11991 San Vicente Boulevard, and 642 and 644 Saltair Avenue, Los Angeles, CA 90049.

In particular, the Green Hollow Square Project site and description, per its EIR, involved the demolition of two then-existing single-family dwellings at 642 and 644 Saltair Ave. and five commercial buildings of one-two stories, and to develop the 2.66 acres with 73,300 sq. ft. of mixed-use retail and residential space. At the time, the Project also offered 427 on-site parking spaces. The demolition portion also sought to demolish the historic and cultural monument known as the “Barry Building,” which is now, in the subject NOP, being presented as its own, allegedly independent Project as of 2019.

The Green Hollow Square Project met fierce community opposition particularly for its proposed demolition of the Barry Building at 11973 San Vicente Blvd., causing the Applicant to formally withdraw the larger project on October 13, 2013. (**Exh. 1** [Withdrawal Requests for 11973 and 11991 San Vicente Blvd.].)

Our review of LADBS permit applications, however, shows that the Applicant *continued* to pursue the processing of permits *after* the above-noted project withdrawals in 2013, and thereafter *reactivated* expired permits and acted on those at all the addresses *other than* the 11973 San Vicente Blvd. Those actions demonstrate that the current Project description in the NOP provides a narrow, piecemealed description of the intended project, in violation of CEQA, as detailed below.

II. NOP-SPECIFIC COMMENTS.

The combined/signed NOP of November 18, 2020¹ is inconsistent with CEQA, as it: (1) provides an incomplete project description in violation of CEQA’s prohibition

¹ On November 12, 2020, the City issued the first Project NOP and filed it with the State Clearinghouse SCH No. SCH 2020110210. (**Exh. 2** [NOP of November 12, 2020].) The description of the NOP scope as filed on November 12, 2020 was not limited to the demolition. However, as we have been informed by the City, on November 18, 2020, a new NOP was published on the State Clearinghouse website by the City and CEQA review company CAJA (on behalf of the Applicant) as SCH 2020110264, which purported to limit the scope of the NOP to only two “requested actions”: (1) impacts of the specific demolition, and (2) other permits that may be necessary. (**Exh. 3** [NOP of November 18, 2020].) To compound the confusion, the newer SCH 2020110264 bore the notation “Project Withdrawn,” and later added a December 2, 2020 Memorandum suggesting that the Project at SCH 2020110264 (the newer NOP) was withdrawn at the request of the lead agency, i.e., the City of Los Angeles, and to refer to the SCH 2020110210 (older NOP). (**Exh. 4** [Memo of December 2, 2020].) Through our phone

against piecemealing; (2) significantly narrows the evaluation of impacts and alternatives of the Project due to the improperly narrow project description; and (3) distorts the baseline environmental setting for the EIR resulting in understatement of impacts.

A. The Project Provides an Artificially Narrow View of the Anticipated Activity, in Violation of CEQA’s Piecemealing Prohibition and “Whole of the Action” Project Definition.

As our Supreme Court has held, the Environmental Impact Report (“EIR”) under CEQA:

“is an ‘environmental ‘alarm bell’ whose purpose it is to alert the public and its responsible officials to environmental changes before they have reached ecological points of no return.’ [Citation.] The EIR is also intended ‘to demonstrate to an apprehensive citizenry that the agency has, in fact, analyzed and considered the ecological implications of its action.’ [Citations.] Because the EIR must be certified or rejected by public officials, it is a document of accountability. If CEQA is scrupulously followed, the public will know the basis on which its responsible officials either approve or reject environmentally significant action, and the public, being duly informed, can respond accordingly to action with which it disagrees. [Citations.] The EIR process protects not only the environment but also informed self-government.” Laurel Heights Improvement Assn. v. Regents of University of California (1988) 47 Cal.3d 376, 392.

Critical to the environmental review process is the opportunity of the public and other public agencies to identify information they require to be included in the Draft EIR to enable informed public review and comment. This also means that it is the lead agency’s job to assure that negative and inconvenient information is not withheld from the public in the Draft EIR, so as to impair the public and expert agencies in their vital

calls to the City, however, we were able to clarify and confirm that the demolition permit application and Project were not withdrawn, and the NOP public comment process continues. However, **the confusion caused by the City and/or Applicant in this regard, including to other agencies that might have commented, necessitates the City promptly correcting this confusion, sending out clear notice, and starting the NOP comment period over.** Please confirm you will do so.

role to help shape a project and to hold the lead agency accountable in the process. All required information must be included at the Draft EIR stage, and not later in the process.

CEQA does not provide a definition for the “project.” The CEQA Guidelines consistently refer to it as an “activity” and caution against the narrow interpretation of it. Guidelines §§ 15002(d), 15060(c), 15064(b)(1). Guidelines § 15378 particularly states: “(a) “Project” means the whole of an action, which has a potential for resulting in either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment.” The Guidelines also provides several examples of “activities” constituting the project. Id. In sum, CEQA forbids piecemealing. California Clean Energy Committee v. City of Woodland (2014) 225 Cal.App.4th 173, 193–194

Apart from inconsistencies noted in footnote 1, supra, ample evidence exists showing that the current Project (i.e., demolition of the Barry Bldg.) is only a piecemealed component of the ultimate larger project. The presumption should be that the whole of the true project that must be disclosed, analyzed, and mitigated as part of the upcoming DEIR is a development project, like the Green Hollow Square project, which is not limited to demolition of the Barry Bldg. in alleged isolation, but rather, which seeks to include demolition of the Barry Bldg. We also note that the same environmental consultant, CAJA, and the same land use law firm involved with the Green Hollow Square project are the same as are involved now.

First, the Initial Study for the 2020 NOP EIR unequivocally states: “This Initial Study evaluates the potential environmental effects that could result from the construction, implementation, and operation of the proposed Project.” (Initial Study, p. 4, **Exh. 5** [Initial Study].)

Second, both the Initial Study and the NOP state: “No future development of the Site is proposed and/or considered *as part* of the Project.” (Initial Study, Cover & NOP, *emph. added.*) The phrase “as part of the Project” deliberately leaves open the possibility that future development of the site is nonetheless being proposed and/or considered *as part of another* project. This interpretation is also supported by other evidence noted below.

Our review of corporate filings of the Applicant 11973 San Vicente LLC reveals that:

- 1) 11973 San Vicente LLC was formed on January 30, 2017 (State ID: 201704010474);

- 2) 11973 San Vicente LLC's only two members are William H. Borthwick and Charles T. Munger; and
- 3) William H. Borthwick and Charles T. Munger are also the only two members of the 11991 San Vicente LLC, formed on February 21, 2017 (State ID: 201706110616) – just 3 weeks after opening the 11973 San Vicente LLC.

The Screenshots below demonstrate the identical filings and ties between the LLCs:

The screenshot shows a web browser window with the URL <https://www.corporationwiki.com/p/2ycdlp/11973-san-vicente-llc>. The page title is "11973 San Vicente, LLC in L...". The navigation bar includes "Overview", "Key People", "Locations", "Filings", and "Contribute". The "Key People" section is active, showing "Who own 11973 San Vicente, LLC". There is an "Excel" button. The list of key people includes:

Name
William H. Borthwick ³ ~ Background Report ~
Charles T. Munger ¹ ~ Background Report ~

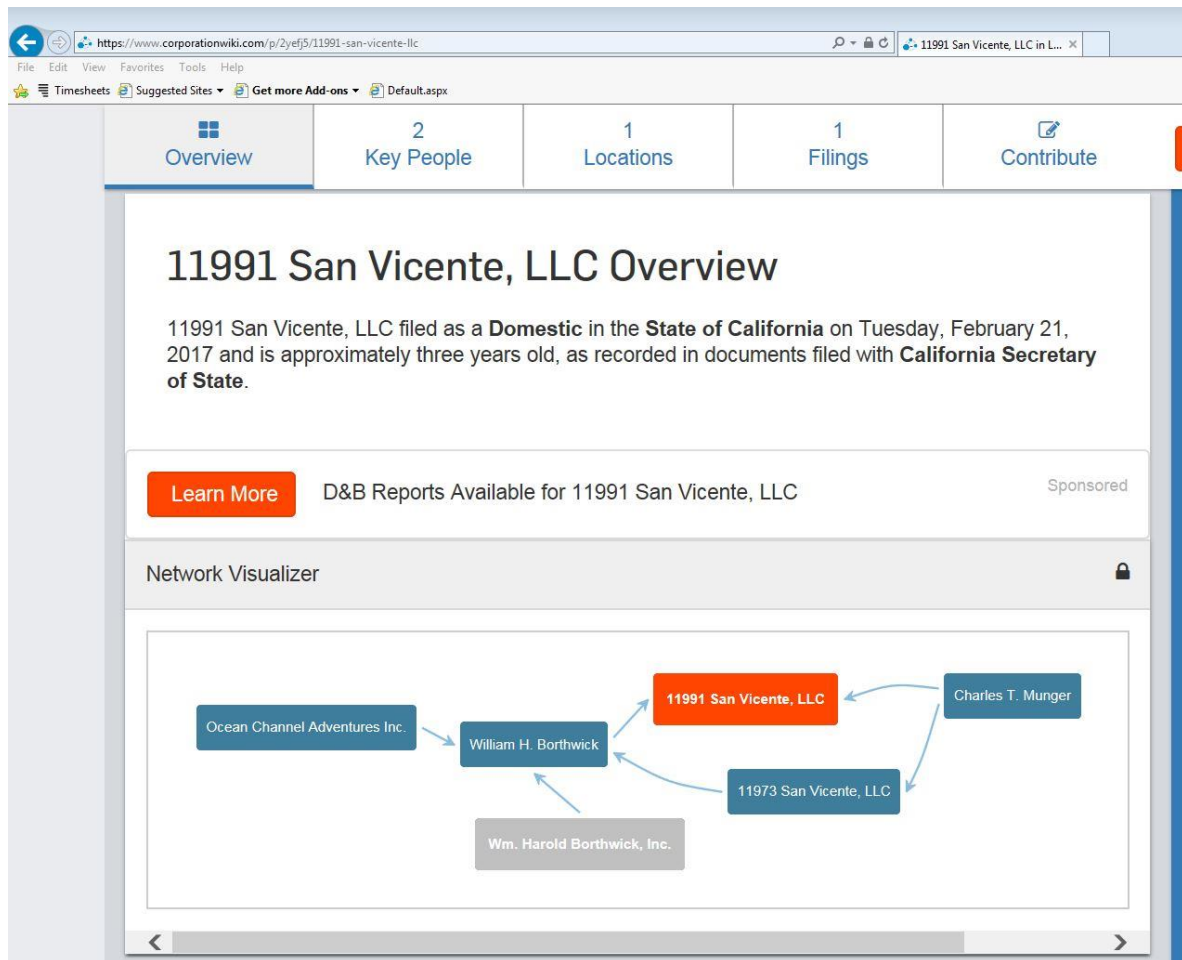
Both individuals are listed with a green "Member" button.

Los Angeles Department of City Planning
Bradley Furuya
December 18, 2020
Page 6

The screenshot shows a web browser window with the URL <https://www.corporationwiki.com/p/2yefj5/11991-san-vicente-llc>. The browser's address bar also shows a tab for "11991 San Vicente, LLC in L...". The website has a navigation bar with tabs: Overview, Key People (selected), Locations, Filings, and Contribute. Below the navigation bar, the page title is "Key People Who own 11991 San Vicente, LLC". There is an "Excel" button with a download icon. The main content area lists two key people:

Name
William H. Borthwick 3 ~ Background Report ~
Charles T. Munger 1 ~ Background Report ~

Each entry has a green "Member" button to its right.



Both 11973 and 11991 San Vicente Blvd. sites were previously included in the 2009-2012 Green Hollow Square Project and its EIR,² also known as the Brentwood Town Green Project. For both sites, the Applicant previously filed a Project Withdrawal request on October 13, 2013. (**Exh. 1** [Project Withdrawal Request and City Communication re Same, as well as Brentwood Town Green NOP].)

² See 2009 EIR for Green Hollow Square Project at:
https://planning.lacity.org/eir/GreenHollowSq/feir/FEIR%20Sections/Final%20EIR_Green%20Hollow%20Square%20Project.pdf

Although such request is not required by law, we specifically request that City print out and incorporate all the materials hyperlinked in this comment letter.
Consolidated Irrigation Dist. v. Superior Court (2012) 205 Cal.App.4th 697, 723-725.

Further, review of the LADBS permits filed for 11973 and 11991 San Vicente Blvd. shows that the Applicant has not stopped pursuing demolition permits for 11991 San Vicente Blvd. *after* its announced project withdrawal on October 13, 2013, but instead *continued* plan check of the demolition permits in 2014 and *reactivated* the previously-issued but expired permits for demolition at 11991 San Vicente Blvd. in 2017. (**Exh. 6** [Reactivated Permits].)

Per the City's communication regarding the October 13, 2013 Project Withdrawals (**Exh. 1**), the 11991 San Vicente address was part of *another* case of general plan and zone amendment and specific plan permit compliance CPC-2009-1064-GPA-VZC-HD-SP-CUB-ZV-SPR, along with this Project site, as well as two single-family residential sites at 642 and 644 Saltair Ave. (**Exh. 1** and **Exh. 7** [CPC Case for 642-644 Saltair and 11991 San Vicente Blvd.].)

The LADBS website shows that the Applicant continued to pursue the demolition permits for the 642 and 644 sites as well after the claimed withdrawal of the prior project in 2013, and was in fact issued demolition permits for the two single family homes. The issued 2020 NOP shows that both 642 and 644 Saltair Ave. single family homes have now been demolished. (Compare screenshots from **Exh. 1** [Revised NOP for 2009 EIR, p. 6] with NOP 2020].)



Aerial image of the site, from p. 6 of the Aug. 4, 2009 NOP for ENV-2009-1065-EIR.



Aerial image of the site, from p. 3 of the Nov. 18, 2020 NOP for ENV-2019-6645-EIR.

The above account of events shows that the only hurdle the Applicant faces as to the implementation of its prior larger development project is the elimination/demolition of the Historic Cultural Monument (“HCM”) Barry Bldg., now falsely being presented in the Project’s NOP in 2020 as its own project.

There is no reasonable doubt that the Applicant’s prior project withdrawal in 2013 was a sham and the Applicant has since completed the demolition of all buildings, except for the Barry Building, in piecemeal fashion. There is no doubt that the Applicant’s actions accomplished an elaborate scheme to circumvent CEQA, and we request that the City investigate the matter thoroughly, as required by CEQA.

The Project’s accurate description is essential for CEQA. The misleading narrow description, as in this NOP, violates CEQA’s informational mandates.

B. The Timing of the Demolition Permit Ordinance Suggests That the Demolition Permit Ordinance May Be Part of This Project or Adopted to Facilitate this Project and Its Impact Must Be Studied in the Present Project's EIR either as a Component of This Project or as a Related Project.

The City Council's PLUM Committee recently approved a motion to have staff bring back a proposed ordinance regarding demolition permit procedures for the claimed purpose of eliminating nuisance conditions.

The Project site has been fenced since approximately 2017, after the Project Applicant evicted all tenants, claiming the building required retrofitting. (Exhs. 8 & 8 [LA Conservancy Article and Real Deal Article].) The Applicant itself has cynically caused a state of disuse on the site, apparently in an effort to justify demolition of the very conditions the Applicant induced.

The timing of the Demolition Permit Ordinance and the NOP in this case suggest the two may be related. The Demolition Permit Ordinance item presented to PLUM on December 8, 2020 attracted fierce opposition from the public, including and particularly for reasons of preservation of historic monuments. (Exh. 10 [Public Comments].)

Because the "whole" of the real project may actually include the proposed Demolition Permit Ordinance, we urge that the DEIR in this case include analysis of any proposed Demolition Permit Ordinance and its reasonably foreseeable environmental impacts, including the acceleration of the loss of historic and/or cultural monuments and other historic resources, as well as the loss of affordable housing.

Should the City find or choose to treat the Demolition Permit Ordinance as merely a timing coincidence with the Project here and not piecemealed from it, we urge that the City nonetheless consider the cumulative impact of the Demolition Permit Ordinance as a related project in the DEIR in this case.

C. The EIR Must Include a Preservation Alternative to Save the Barry Building – a Historic and Cultural Resource.

As evidenced above, the Project is not only the demolition of the Barry Bldg., but also the intended and/or anticipated development of the site. The subsequent development of the site is reasonably foreseeable. As such, the EIR must not only provide a complete and accurate project description to include the development of the site, at a minimum using the Green Hollow Square Project as an assumed starting point,

but also analyzing scenarios that might reasonably be expected under the City's current regulatory framework (e.g., TOC projects), and also provide feasible alternatives for the development of the site, including but not limited to the alternatives of preserving the HCM Barry Bldg.

“The purpose of an EIR is *not* to identify alleged alternatives that meet few if any of the project's objectives so that these alleged alternatives may be readily eliminated.” Watsonville Pilots Assn. v. City of Watsonville (2010) 183 Cal.App.4th 1059, 1089 (emphasis orig.) An EIR's failure to analyze a reduced development alternative is a violation of CEQA. Id. at 1090; see also Preservation Action Council v. City of San Jose (2006) 141 Cal.App.4th 1336, 1353-1358.

“CEQA was enacted to advance four related purposes to: (1) inform the government and public about a proposed activity's potential environmental impacts; (2) identify ways to reduce, or avoid, environmental damage; (3) prevent environmental damage by requiring project changes via *alternatives* or mitigation measures when *feasible*; and (4) disclose to the public the rationale for governmental approval of a project that may significantly impact the environment. (Citation omitted.)” California Building Industry Assn. v. Bay Area Air Quality Management Dist. (2015) 62 Cal.4th 369, 382 (emph. added); see also Guidelines § 15002.

The City must study all feasible alternatives and the EIR must identify a reasonable range of alternatives. Guidelines § 15126.6(c). See also San Bernardino Valley Audubon Society, Inc. v. County of San Bernardino (1984) 155 Cal.App.3d 738, 751-752 (“Board must state *why* the alternative is infeasible.” (Emph. orig.)); Pub. Res. Code § 21002 (agency cannot approve a project if feasible alternatives are available).

Most importantly, the feasibility contemplated under CEQA – and for alternatives – is not determined by the profitability of the Project or economic ambitions of the Project Applicant, but is an objective inquiry into whether there are any legal restraints or whether the project will not be economically at a loss. See Uphold Our Heritage v. Town of Woodside (2007) 147 Cal.App.4th 587, 599, 602-603; Center for Biological Diversity v. County of San Bernardino (2010) 185 Cal.App.4th 866, 883.

Therefore, the preservation alternatives in the EIR may not be based on financial feasibility and must include but, not be limited to:

- 1) Preserving the Barry Building and allowing development on the remaining site only, but in a manner that does not impair its historic significance;

- 2) Adaptive reuse of the Barry Building, whereby the Barry Building will retain its features and historic significance;

Given the current absence of any publicly-available *current* plans, we incorporate by reference the preservation Alternative 4 of the prior 2012 EIR on the site, as well as the Los Angeles Conservancy's and others' comments, in support of preservation alternatives. (**Exh. 11** [2012 EIR Alternative 4, Public Comments, LAC Comments; Comment by Historian].) We ask that the City thoroughly investigate and disclose what the ultimate Project is and explore the previously-proposed as well as other feasible alternatives. The EIR must fully explore all feasible alternatives, to comply with CEQA.

We urge that the 2020 EIR for the Project include various preservation alternatives and alternative sites, aimed to preserve the historic building and its historic significance at 11973 W. San Vicente Blvd., and address each alternative and their feasibility as listed in the 2012 EIR, and comment letters in **Exhibit 11**. We also urge that the EIR study the preferred and reduced alternatives, as required by CEQA and case law.

D. The EIR May Not Be Limited to the Demolition Impacts, But Must Include All Impacts Associated with Development of the Site.

The Project is manifestly not solely the demolition, but also the subsequent development of the site. Therefore, the NOP is improper as it focuses on the impacts of demolition alone, whereas it should instead account for all impacts of the reasonably foreseeable and yet piecemealed subsequent development at the site.

We urge that the 2020 NOP study all environmental impacts under CEQA, associated with *both* the demolition and development impacts, including but not limited to the grading of the site, construction, and operation, as well as individual and cumulative impacts of such ultimate project with all related projects.

E. The EIR Must Also Adopt the Prior 2009 Baseline Environmental Setting, In View of Piecemealing.

CEQA's first objective is to identify impacts. Citizens of Goleta Valley v. Board of Supervisors (1990) 52 Cal.3d 553, 563-564; Guidelines §§ 15002, 15003(a). Without an adequate baseline, "analysis of impacts, mitigation measures and project alternatives becomes impossible." County of Amador v. El Dorado County Water Agency (1999) 76 Cal.App.4th 931, 953. Baseline assumptions are environmental conditions existing at the time the notice of preparation is published. Guidelines § 15125(a)(1). CEQA allows a different baseline only for situations that fluctuate without the control of the developer.

There is evidence that the Project – despite its official withdrawal request in 2013 – was not withdrawn but instead proceeded in a piecemeal fashion, with all the buildings having been demolished, except for the Barry Building in this Project. Thus, the Applicant/Developer itself has been changing the baseline environmental setting of the Project site.

To allow the Applicant to do so would enable the Applicant – and set a dangerous precedent for others – to circumvent CEQA’s meaningful analysis of impacts by piecemealing projects. In particular, as a result of this piecemealing, the Applicant has inflated the current baseline environmental setting (e.g., traffic, GHG or air quality) as compared with 2009 when the initial NOP for the project was issued, and thereby understates the Project’s current impacts to the community.

Such an approach was recently rejected in an EIR, with the agency being required to revert to the old baseline, considering that what was proposed later was essentially the same project as before:

“ARB’s use of the wrong baseline skewed the calculation performed in the first step. The resulting error was so large that ARB did not reach the second and third steps of the analysis. More specifically, NOx emissions from the combination of biodiesel and renewable diesel increased between 2009 and 2014. Use of 2014 as the baseline of NOx emissions included this increase and, thus, overstated the baseline figure. The inflated baseline had the effect of understating the increase in NOx emissions for 2016 and subsequent years. Consequently, ARB’s use of an inappropriate baseline as the point of comparison for the project’s NOx emissions requires reversal even if paragraph 3 were interpreted as (1) directing ARB to address only future (i.e., 2016 through 2021) NOx emissions and their **707 causes and (2) allowing it to skip over the potential impacts from 2009 through 2015. In sum, ARB’s analysis of NOx emissions was defective even if it is given the benefit of the ambiguity in paragraph 3’s use of the phrase “will have.” POET, LLC v. State Air Resources Bd. (2017) 12 Cal.App.5th 52, 83

The Project’s EIR now has to use the same environmental setting as in 2009, when the actual project’s NOP was issued. We incorporate by reference the environmental setting of the 2009 DEIR and urge the City to use it as the baseline for the upcoming EIR.

Los Angeles Department of City Planning
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(https://www.dropbox.com/sh/3wtu81ekd65opny/AAAACc_u3dQbRD2mu0FPfzUoa?dl=0) [Entire 2012 DEIR] see fn. 2, ante.)

F. The Project and Its EIR Must Study All Actions Needed for Demolition and Subsequent Development.

Because the true Project is more than merely demolition and removal of debris, but involves subsequent grading and development of the site, the EIR should study actions needed to complete the subsequent development, including but not limited to those requested in the 2009 NOP, as listed below

“REQUESTED PERMITS/APPROVALS: General Plan Amendment from Low Density Residential to Neighborhood Commercial **and Vesting Zone and Height District Changes** from RS-1-0 to (V)(Q)C4-1 VL-0 (for the proposed alternative uses of the two existing residential lots on the northwest portion of the site); and from C4-1VL to (V)C4-1VL and from P-1VL-0 to (V)P-1 VL-0 (on the remainder of the project site); **Conditional Use Permit; Project Permit Compliance Review**; preliminary and Final **Design Review** by the San Vicente Design Review Board; **Specific Plan Amendment**; and **demolition** permit.” (Exh. 1 [2009 NOP].)

We also request that the grading amounts for haul route approval include the amount of grading that is associated with both the demolition and subsequent grading of the site for purposes of the development.

Very truly yours,

/s/ Robert P. Silverstein

ROBERT P. SILVERSTEIN

FOR

THE SILVERSTEIN LAW FIRM, APC

RPS:vl
Encls.

ATTACHMENT H



Source: R.A. Keller Associates, 2011.



B3 - Blue2

James Harris <james.harris@lacity.org>

Request for Extension of Public Comment Period Deadline for the proposed Demolition of the Barry Building DEIR (11973 San Vicente Boulevard Project, ENV-2019-6645-EIR), HCM #887

1 message

Bob Blue <bob.blue@live.com>

Tue, Mar 21, 2023 at 12:30 PM

To: "james.harris@lacity.org" <james.harris@lacity.org>

Cc: Ziggy Kruse <ziggykruse2005@yahoo.com>, "ldishman@laconservancy.org" <ldishman@laconservancy.org>, "afine@laconservancy.org" <afine@laconservancy.org>, "vanbreene@laconservancy.org" <vanbreene@laconservancy.org>, "chc@lacity.org" <chc@lacity.org>, "bamilofsky@cpp.edu" <bamilofsky@cpp.edu>, "gmk@kdgarchitects.com" <gmk@kdgarchitects.com>

James Harris

City of Los Angeles, Department of City Planning

[221 N. Figueroa Street, Suite 1350](#)[Los Angeles, CA 90012](#)*Via Email Only*

Subject: Request for Extension of Public Comment Period Deadline for the proposed Demolition of the Barry Building DEIR (11973 San Vicente Boulevard Project, ENV-2019-6645-EIR), HCM #887

Dear Mr. Harris,

We are reaching out to you in regard to the DEIR for the proposed demolition of the Barry Building, located at 11973 San Vicente Boulevard, LA 90049.

We are asking to have the public comment period be extended by **30 days** (from *April 3, 2023 to May 3, 2023*), so that the community is given an opportunity to submit their comments on the DEIR, which was released on February 16, 2023.

Below are our reasons for requesting the extension of the comment period deadline on the Barry Building DEIR (Project name: **11973 San Vicente Boulevard Project, ENV-2019-6645-EIR**):

1. The record rain and flooding in Los Angeles, including our neighborhood, compromised the community's ability to respond in a timely manner to the DEIR. Many of us were preoccupied on dealing with how this weather affected our homes and daily commutes.

2. There is a lot of interest in the history of the Barry Building and preventing its demolition. In fact, the 2011 Green Hollow Square Project

was withdrawn because of the community's interest in preserving the Barry Building by nominating it as a Historic Cultural Monument (HCM).

Also, after looking through the comment letters submitted by members of the community on the NOP, it shows that 19 out of 20 comments for the NOP were against demolition of the Barry Building.

There are a number of aspects in the DEIR that address the history of the Barry Building, which makes it imperative that the community fully understands those aspects in order to submit any additional substantive comments regarding the DEIR.

3. There are a little over 2,000 pages of studies, reports, comments, etc. in the DEIR. This amount of material in the DEIR for review is very significant for a project limited to the demolition of a commercial building. The public has a right to fully understand each and every one of those documents in order to submit any comments.

4. In terms of public safety, there is no urgency since the Barry Building is secured from harm to neighbors and anyone else. However, the only danger the public faces now is the destruction of this HCM.

5. As mentioned above, this building has been a community resource with a long history, a designation of architectural significance, and is a City of Los Angeles Historical Cultural Monument (HCM #887).

There is no proposal to replace it. Therefore an extension of DEIR comment time allows more careful consideration of what the building means to the community.

The destruction of a City of Los Angeles Historical Cultural Monument is irreversible and sets a dangerous precedent for other historical structures in the City.

The Los Angeles Conservancy pointed out that there is no need for demolition of the Barry Building or any designated landmark when clear reuse alternatives are present.

Having a fair and reasonable comment period is a benefit to all parties including the Project applicant, the City, and the Constituents.

Please let us know if the request for extension of time for the public comment period is granted.

Thank you,

3/21/23, 12:55 PM

City of Los Angeles Mail - Request for Extension of Public Comment Period Deadline for the proposed Demolition of the Barry B...

Bob and Ziggy Blue



James Harris <james.harris@lacity.org>

Demolition of the property, Barry Building

1 message

Nathan Younan <nathanyounan@gmail.com>

Fri, Mar 10, 2023 at 4:11 PM

To: james.harris@lacity.org

Cc: mike@afriat.com

James Harris
Los Angeles City Planning
[221 N. Figueroa Street, Ste. 1350, LA, CA 90012](#)
james.harris@lacity.org

Dear James Harris,

I am the owner and operator of The Vape Lounge and a small business on San Vicente Blvd close to the fenced off and vacant Barry Building. As a small business owner, I would like to express my support for the demolition of the Barry Building. The vacant and unused property is not good for business. After the building is demolished, I would like to see something new go in its place that would be good for commerce and local small business.

Thank you,

Nathan Younan
Owner of The Vape Lounge
[11958 San Vicente Blvd Los Angeles, CA 90049](#)
<https://thevapelounge760.com/>

March 10, 2023

James Harris
Los Angeles City Planning
221 N. Figueroa Street, Suite 1350
Los Angeles, CA 90012
E-mail: james.harris@lacity.org

Re: I support the demolition of the Barry Building

Dear Mr. Harris and LA City Planning:

My name is Anne Russell and I am a small business owner, Rodeo Realty, located on San Vicente Blvd. My business is across from the Barry Building. I am writing to express my support for the demolition of the Barry Building.

The vacant and seismically unstable Barry Building is not good for business or the Brentwood community. As a Brentwood realtor, I would like to see something go there that is good for the Brentwood and its residents.

Sincerely,

Anne Russell
Rodeo Realty – 11940 San Vicente Blvd
anne@rodeore.com

March 1, 2023

James Harris
Los Angeles City Planning
221 N. Figueroa Street, Suite 1350
Los Angeles, CA 90012
E-mail: james.harris@lacity.org

Re: I support the Barry Building demolition

Dear Mr. James Harris,

I have been a long time Brentwood resident and am writing to support the demolition of the Barry Building.

The Barry Building is structurally unfit and is likely to fall in an earthquake. As a person who works in construction, I have a strong understanding of the risks a seismically unstable building presents. What it would take to bring this building up to code and retrofitted would make this project economically unfeasible.

Please keep our Brentwood community safe and demolition the Barry Building.

Thank you,



Manuel Maradiaga



James Harris <james.harris@lacity.org>

Proposed demolition of the Barry building on San Vicente Blvd1 message

JACK FINE <sanjacfine@aol.com>
To: james.harris@lacity.org

Tue, Apr 18, 2023 at 3:55 PM

Dear Mr Harris: I write as a longtime resident and homeowner in the block of homes immediately adjacent to the proposed demolition. My wife, Sandy Fine, and I live at 11923 Saltair Terrace just behind the Barry Building. We have lived in our home and enjoyed the many benefits of the Barry building for over 40 years. We strongly oppose the senseless destruction and demolition of this building. The proponent, Mr Munger, has not disclosed the true purpose of his application, which is to prepare the lot on which the current historic, popular, highly useful and beautiful building sits for future undisclosed commercial development in combination with the adjacent properties he currently owns. He has not established that he has attempted to find an acceptable reuse for the existing building which is required as a precondition to the proposed demolition of this designated historical-cultural landmark. His previous intentions for the consolidated parcels have ranged from a multistory regional shopping center to a senior citizens residential facility, all of which would radically change the low-key residential character of the neighborhood in which it sits and none of which have been acceptable to the adjacent homeowners. We walk by the Barry Building multiple times each day. We enjoy its beauty and observe that from the outside it appears to be in relatively excellent and clearly reusable condition. But Mr Munger simply wants it to deteriorate and ultimately disappear. He bought into an existing, long established and well maintained area and simply wants to destroy the building so that he can change and destroy the highly popular and comfortable surroundings on which it sits. He must not be permitted to do so. For all of the foregoing reasons my wife and I together with the vast majority of the homeowners adjacent to the subject property strongly oppose the pending demolition application.

Sincerely yours,

Jack and Sandy Fine
11923 Saltair Avenue Los Angeles, CA 90049. Tel: 310 472-0475.
Sent from my iPhone

From: Sev Burmaka <sevaburmaka@gmail.com>

B8 - Burmaka

Date: March 24, 2023 at 1:31:00 PM PDT

To: james.harris@lacity.org

Subject: Re: Support for the safe demolition of the Barry Building

Dear Mr. Jim Harris and the LA City Planning Department:

I am writing to express my support for the demolition of the seismically unstable Barry Building. I believe that the safety and well-being of the people in the Brentwood community should be the top priority.

The risks posed by the building's instability are too great to ignore. Even a minor earthquake could cause significant damage and put members of the Brentwood community in danger.

While it is always difficult to say goodbye to an old building, sometimes it is necessary to make tough decisions for the greater good. I believe that demolishing the Barry Building is the best course of action.

Thank you for your consideration.

Sincerely,

Seva Burmaka

March 24, 2023

James Harris
Los Angeles City Planning
221 N. Figueroa Street, Suite 1350
Los Angeles, CA 90012
E-mail: james.harris@lacity.org

Re: Demolish the Barry Building, it is not safe

Dear LA City Planning:

I live on Montana Ave in Brentwood and am writing to support the demolition of the Barry Building. It is my understanding that the building is not seismically safe and can be a safety hazard during an earthquake.

As an engineer who previously worked for the City of Los Angeles, I am deeply concerned that a seismically unstable building on San Vicente, a main pedestrian thoroughfare, could be severely damaged and cause human injury.

Even though the building a historic cultural monument, the fact that it can collapse is dangerous for the community. I support the safe demolition of the Barry Building at 11973-11975 San Vicente Boulevard, Los Angeles, CA 90049.

Sincerely,



Hamed Sandoghdar
Hamed269@yahoo.com
Brentwood resident on Montana

March 28, 2023

James Harris
Los Angeles City Planning
221 N. Figueroa Street, Suite 1350, Los Angeles, CA 90012
E-mail: james.harris@lacity.org

Re: SUPPORT for the safe demolition of the Barry Building

Dear Mr. James Harris and LA City Planning:

I am writing to express my support for the proposed demolition of the Barry Building. As a longtime Brentwood resident, I am deeply concerned about the safety of our buildings and infrastructure in the event of an earthquake. The Barry Building is at high risk of collapse and poses a serious threat to the safety of our community.

The building's structural deficiencies and lack of earthquake-resistant features make it highly vulnerable to seismic activity. It is not up to the minimum seismic standards required by the City and is a safety hazard to those who live and work in the area. As a responsible member of the community, we must prioritize the safety and well-being of all citizens.

I believe that the safest solution is to demolish the Barry Building. I urge you to support the demolition of the Barry Building to protect our community's safety and well-being.

Sincerely,

A handwritten signature in dark ink, appearing to read "Michael Lewis", with a stylized, cursive script.

Michael Lewis
837 S. Westgate Avenue, #2
Los Angeles, CA 90049



22025 Ventura Blvd #202 • Woodland Hills CA 91364 • (818) 776-2870

March 29th, 2023

CALIFORNIA

Beverly Hills

Brentwood

Calabasas

Sherman Oaks

Westlake Village

Woodland Hills

NEVADA

Pueblo Center

Trails Village Center

CenterPointe Plaza

James Harris
Los Angeles City Planning
221 N. Figueroa Street, Suite 1350
Los Angeles, CA 90012
E-mail: james.harris@lacity.org

Re: Fazio Cleaners supports the Barry Building demolition

On behalf of Fazio Cleaners, I am writing to express our strong support of the demolition of the Barry Building.

The Barry Building being vacant and seismically unstable building is not good for Brentwood and Brentwood's business community. The fenced building is a magnet to vandalism and homelessness and is a nuisance to the commercial businesses on San Vicente Blvd. The risk of collapse due to an earthquake is also dangerous for its neighboring businesses. The Barry Building is unprosperous, unsafe, and unclean.

This demolition of the Barry Building creates a blank canvass for a new opportunity and a future development which has the potential to invigorate San Vicente Blvd.'s commercial district. Fazio Cleaners stands in firm support of the demolition of the Barry Building.

Sincerely,


Nicole Fazio
CFO
Fazio Inc.



PICK UP & DELIVERY FOR ALL LOCATIONS: (800) 734-4899



Douglas Emmett Management, LLC
1299 Ocean Avenue, Suite 1000, Santa Monica, California 90401
Telephone 310.255.7700 Facsimile 310.255.7702

March 28, 2023

James Harris
Los Angeles City Planning
221 N. Figueroa Street, Suite 1350
Los Angeles, CA 90012
E-mail: james.harris@lacity.org

Re: Douglas Emmett Supports the Barry Building Demolition

Dear Mr. Harris,

On behalf of Douglas Emmett, I am writing to express our strong support of the demolition of the Barry Building.

Douglas Emmett affiliates own and operate approximately 18.1 million square feet of Class A office space and over 5,000 apartment units in Los Angeles and Honolulu. We focus on markets in central business districts with strong economic characteristics and a broad range of amenities. We strive to be active in our communities in order to promote prosperous, safe, clean and beautiful commercial districts, such as Brentwood's San Vicente corridor, for our tenants and their customers.

The lot on which the vacant Barry Building is located is an eyesore for the community. The fenced building is a magnet to vandalism and homelessness and is a nuisance to the commercial businesses on San Vicente Blvd. The building is seismically unstable and cannot be brought up to either seismic or ADA code and unless it can be demolished, it will continue to be a blight on the Brentwood residential and business communities.

This demolition of the Barry Building creates a blank canvass for a new opportunity and a future development which has the potential to invigorate Brentwood's commercial district. Douglas Emmett stands in firm support of the demolition of the Barry Building.

Sincerely,

A handwritten signature in blue ink, appearing to read "Michele Aronson".

Michele Aronson
Executive Vice President
Douglas Emmett Management, LLC



James Harris <james.harris@lacity.org>

Barry Building (Historic-Cultural Monument #887)

1 message

stern123@earthlink.net <stern123@earthlink.net>
To: james.harris@lacity.org

Thu, Mar 23, 2023 at 1:54 PM

I urge you to work to preserve the Barry Building, which can be well rehabbed to provide a comfortable, neighborly seating place. I have lived in the neighborhood since 1962.

Evelyn Stern

stern123@earthlink.net



James Harris <james.harris@lacity.org>

Save the Barry!

1 message

Jim Olds <jolds2@icloud.com>
To: james.harris@lacity.org

Thu, Mar 23, 2023 at 8:17 AM

Hello- I am writing you to urge your Department to enforce the City's landmark cultural-historic designation program re: the Barry building in Brentwood. As a former City employee and lover of history, I urge you to put your foot down and not approve the owner's "demolition by neglect" proposal. L.A. needs diversity in architecture, not just glass condo towers everywhere. The LA Conservancy can assist you in finding new and shared uses for this famous building. I have always been proud of L.A.'s historic building preservation codes. Please don't further gut them by allowing this demolition. Don't repeat the Taix disaster. Thank you for your consideration.

Sent from my iPhone



James Harris <james.harris@lacity.org>

Re: The Barry Building'Brentwood

1 message

Richard Alfieri <richard369@gmail.com>
To: james.harris@lacity.org

Wed, Mar 22, 2023 at 7:01 PM

Mr. Harris:

Please do what you can to save the Barry Building in Brentwood. Too many of our precious architectural treasures have been destroyed. This Mid-century Modern gem has been neglected, possibly with the intention of making its demolition inevitable; but it should be preserved. We need your help.

Thank you.

Sincerely,

Richard Alfieri



B16 - Korman

James Harris <james.harris@lacity.org>

Demolition of Barry Building | 11973 San Vicente Boulevard Project (Case No. ENV-2019-6645-EIR)

1 message

Sabrina Korman <sabrina.korman@gmail.com>

Wed, Mar 22, 2023 at 6:09 PM

To: "james.harris@lacity.org" <james.harris@lacity.org>

Dear Mr. Harris,

I am writing to you today to express my deep concern about the proposed demolition of the Barry Building. As you know, this building is a Historic-Cultural Monument (HCM) and needs to be protected. There are viable preservation alternatives to demolition that must be fully considered and explored.

The proposed demolition of the Barry Building sets a dangerous precedent for future proposed demolitions of HCMs. If approved, the City will have awarded the owners for their bad behavior. The owners have used demolition by neglect since evicting tenants to circumvent historic preservation protections. Countless beloved businesses were forced out of this building over the years. It was a community space for the young and old of which I have many fond memories. That community space could have and should have persisted. **If approved, the City will have sent a message that it is okay to neglect and demolish historical buildings.**

Under the California Environmental Quality Act (CEQA), the City is required to deny projects that have feasible alternatives. In this case, there are clear preservation alternatives that had been presented in previous project proposals. The City should not approve the demolition of the Barry Building until all viable preservation alternatives have been fully considered and explored.

I urge you to reconsider your decision to demolish the Barry Building. This building is an important part of our city's history and heritage. It should be preserved for future generations to enjoy.

Thank you for your time and consideration.

Sincerely,

Sabrina Korman (Brentwood resident for the past 25 years)



James Harris <james.harris@lacity.org>

11973 San Vicente Boulevard Project (Case No. ENV-2019-6645-EIR)

1 message

Stephanie Bernabe <stephanie.bernabe@gmail.com>
To: james.harris@lacity.org

Wed, Mar 22, 2023 at 9:19 PM

Mr. Harris,

I strongly oppose the project dealing with the Barry Building, which is a Historic-Cultural Monument (HCM). This is needless demolition of a designated landmark when clear reuse alternatives are present. Other important points that need to be reinforced in order to stop this demolition are as follows:

- 1) The Barry Building is a Historic-Cultural Monument (HCM) and needs to be protected.
- 2) There are viable preservation alternatives to demolition that must be fully considered and explored.
- 3) The proposed demolition of the Barry Building sets a dangerous precedent for future proposed demolitions of HCMs.
- 4) The owners have used demolition by neglect since evicting tenants to circumvent historic preservation protections.
- 5) If approved, the City will have awarded the owners for their bad behavior. Under the California Environmental Quality Act (CEQA), the City is required to deny projects that have feasible alternatives. In this case, there are clear preservation alternatives that had been presented in previous project proposals.

Regards,
Stephanie



James Harris <james.harris@lacity.org>

safe demolition of the Barry Building

1 message

Susan Winick <susanwin@icloud.com>
To: james.harris@lacity.org

Wed, Mar 22, 2023 at 7:54 PM

March 21, 2023

James Harris
Los Angeles City Planning
[221 N. Figueroa Street, Suite 1350](#)
[Los Angeles, CA 90012](#)
E-mail: james.harris@lacity.org

Re: I support the safe demolition of the Barry Building

Dear LA City Planning:

I am writing to express my support for the safe demolition of the seismically unstable Barry Building located at [11973-11975 San Vicente Boulevard](#). As a concerned citizen, I believe that it is important to prioritize the safety and well-being of our community, and the demolition of this unstable building is a necessary step in ensuring that safety.

As you may know, seismically unstable buildings can pose a significant risk to the safety of those who live, work, or visit the area. In the event of an earthquake or other natural disaster, these buildings can collapse or cause significant damage, putting lives at risk. It is our responsibility to take action to prevent such a disaster from occurring.

While it is understandable that some may have sentimental attachments to the building or wish to preserve its historical significance, we must prioritize safety above all else. The potential consequences of not taking action could be catastrophic, and we cannot afford to take that risk.

Therefore, I urge you to support the safe demolition of the seismically unstable building. I trust that the proper precautions will be taken to ensure that the demolition is carried out in a way that minimizes any potential risks to the surrounding area and the community at large.

Thank you for your consideration and for your commitment to the safety and well-being of our community.

Sincerely,

Susan Winick



James Harris <james.harris@lacity.org>

11973 San Vicente Boulevard Project (Case No. ENV-2019-6645-EIR)

1 message

Casey <caseyjacks@yahoo.com>

Fri, Mar 24, 2023 at 1:22 PM

Reply-To: Casey <caseyjacks@yahoo.com>

To: "james.harris@lacity.org" <james.harris@lacity.org>

Cc: "councilmember.park@lacity.org" <councilmember.park@lacity.org>

To whom it may concern:

I strongly oppose demolition of the Barry Building, a designated Historic-Cultural Monument (HCM), and the needless demolition of any designated landmark when clear reuse alternatives are present.

The Barry Building is a Historic-Cultural Monument (HCM) and needs to be protected.

There are viable preservation alternatives to demolition that must be fully considered and explored.

The proposed demolition of the Barry Building sets a dangerous precedent for future proposed demolitions of HCMs.

The owners have used demolition by neglect since evicting tenants to circumvent historic preservation protections. If approved, the City will have awarded the owners for their bad behavior.

Under the California Environmental Quality Act (CEQA), the City is required to deny projects that have feasible alternatives. In this case, there are clear preservation alternative that had been presented in previous project proposals.

Sincerely,
Casey Welch

March 20, 2023

James Harris
Los Angeles City Planning
221 N. Figueroa Street, Suite 1350, Los Angeles, CA 90012
E-mail: james.harris@lacity.org

Re: I support the demolition of the Barry Building

Dear James Harris and LA City Planning:

I support the demolition of the Barry Building. The Barry Building is structurally unfit and is likely to suffer severe damage in an earthquake. The building does not meet the minimum seismic standards required by the City and is a safety hazard to the community. The safest solution is to demolish the building.

Sincerely,

Claudia Arrendondo
Brentwood resident

March 20, 2023

James Harris
Los Angeles City Planning
221 N. Figueroa Street, Suite 1350
Los Angeles, CA 90012
E-mail: james.harris@lacity.org

Re: I support the demolition of the Barry Building

Dear Mr. Harris and LA City Planning:

My name is Manpreet Rai and I am a resident of Brentwood. I am writing to express my support for the demolition of the Barry Building.

The Barry Building is structurally unstable and will suffer severe damage in an earthquake. This is not safe for the Brentwood community. I support the safe demolition of the Barry Building at 11973-11975 San Vicente Boulevard, Los Angeles, CA 90049.

Sincerely,

Manpreet Rai

A handwritten signature in black ink, appearing to read 'Manpreet Rai', with a stylized, cursive script.



James Harris <james.harris@lacity.org>

11973 San Vicente Blvd. Project, Case Number ENV-2019-6645-EIR

1 message

Rory Cunningham <mroryofhollywood@ca.rr.com>

Thu, Mar 23, 2023 at 4:31 PM

To: james.harris@lacity.org

Cc: councilmember.park@lacity.org

To Whom it may Concern,

The Barry Building, located at [11973 San Vicente Boulevard](#), is a Los Angeles Cultural Historic Monument and as such need to be preserved - intact - for future generations. The current owner has left the building to deteriorate purposely and should not be allowed to continue with their demolition by neglect.

While Los Angeles needs more housing, what it truly needs the most is affordable housing and that includes rent controlled apartments. The Barry Building offers such housing in an impressively designed setting for families to thrive.

If the Barry Building is allowed to be demolished you will be setting an unforgivable precedent that will lead to a domino effect of historically and culturally important places being destroyed and thrown into landfills so that developers can profit at the demise of our collective history.

There are obvious preservation alternative to the demolition of this building and under the California Environmental Quality Act the City is required to deny projects that have preservation alternatives.

Do the right thing and deny the demolition of the Barry Building so that the architectural history of this property can be preserved for future generations to benefit from its bounties.

Most Sincerely,

Rory Cunningham
HCM #792 B. H. Hiss House
[215 S. Manhattan Place](#)
[Los Angeles, CA 90004](#)



James Harris <james.harris@lacity.org>

SAVE Barry Building (Historic Cultural Monument #887)

1 message

brian@1301pe.com <brian@1301pe.com>

Sat, Mar 25, 2023 at 12:44 PM

To: "james.harris@lacity.org" <james.harris@lacity.org>

Dear Mr. Harris,

I'm writing in **support of saving** the historic Barry Building at [11971 San Vicente Blvd](#) in Brentwood.

Designed by architect Milton Caughey in 1951, it is one of the few mid-century modern commercial buildings in all of Los Angeles. Having lived in the area over the past 40 years, this building was a linch pin to the community with Dutton's Bookstore and then continued to be a gathering place with Luxxe Cafe until the owner Charles Munger gave final eviction notice to all tenants.

For years, it has been proven that Mr. Munger and now 1973 San Vicente LLC do not care about the importance of the building. This is a key part of San Vicente Blvd that does not need their type of development. This has been made clear to them over the years. By simply looking to the other side of the street at Alfred Coffee it becomes perfectly clear that the people of Brentwood and beyond would flock to the Barry Building once more if it were properly restored and opened to local businesses.

I strongly urge you to stop the demolition of this historic building and encourage the current owners to divest the building to an owner who would honor our history past and present!!

Kind regards,

Brian Butler
[12342 Montana Ave #2](#)
[Los Angeles, CA 90049](#)



RE: DEIR Barry Building / "11973-11975 San Vicente Boulevard Project" DEIR (ENV-2019-6645-EIR) ... Truncated Email included in Appendix A-3 - NOP Comments

1 message

Ziggy Kruse <ziggykruse2005@yahoo.com>

Fri, Mar 24, 2023 at 12:51 PM

Reply-To: Ziggy Kruse <ziggykruse2005@yahoo.com>

To: James Harris <james.harris@lacity.org>

Cc: Ziggy Kruse <ziggykruse2005@yahoo.com>, Bob Blue <bob.blue@live.com>, Jeff Khau <jeff.khau@lacity.org>

Good Afternoon, Mr. Harris:

This is in regard to the "[11973-11975 San Vicente Boulevard Project](#)" DEIR (ENV-2019-6645-EIR), which was released on February 16, 2023.

Within **Appendix A-3 - NOP Comments** is an email from Lisa Avebury of the LA Conservancy. However, that email is truncated at the right side of the text, which means it cut off important portions of the text.

I have attached that document to this email for you.

Please provide a true and complete copy of that email as soon as possible so that I can review the LA Conservancy's submission to the NOP for this project without having to guess what the statements would be.

Thank you for your prompt attention to this matter.

Sincerely,
Ziggy Kruse Blue



DEIR Excerpt_A-3 - NOP Comments_Email from Lisa Avebury_LA Conservancy.pdf

260K



Barry Building

1 message

Lisa Avebury <circleseeker@gmail.com>
To: bradley.furuya@lacity.org

On behalf of the Los Angeles Conservancy, I am writing to comment on the Notice of Preparation (NOP) for the [11973 San Vicente Boulevard Project](#). The subject property, is Historic-Cultural Monument (HCM) #887.

The Los Angeles Conservancy is extremely concerned by the proposed demolition of a designated HCM for no other reason than to clear the lot without an identified replacement project. This creates a dangerous precedent and incentivizes future property owners from pursuing similar outcomes, as well as encouraging demolition by neglect. Should the City of Los Angeles approve the proposed demolition of this HCM without a replacement project, it will severely erode protections upheld by the City's historic preservation program and result in a potential violation of the California Environmental Quality Act (CEQA).

I. 11973 San Vicente Boulevard, known as the Barry Building, is a designated Historic-Cultural Monument.

Completed in 1951 and designed by local architect Milton Caughey for owner David Barry. The Barry Building is an excellent example of Mid-Century Modern commercial architecture. It incorporates elements of the International Style, that include an elevated second story, clean lines, a horizontal orientation, and an interior courtyard with cantilevered staircases.



19203.000 - 298458.2

In 2007, the City of Los Angeles designated the Barry Building as Historic-Cultural Monument #887 because it is an excellent and intact example of Mid-Century Modern architecture.

II. Demolition by neglect is being used as a tactic to circumvent historic preservation regulations and CEQA.

For over ten years the property owners, that includes Charles T. Munger, has sought to demolish the historic Barry Building. Redevelopment plans have varied from commercial complexes, and each of these iterations have included the complete demolition of HCM #887.

In 2012, the City released its Final EIR for the Green Hollow Square Project, which called for the demolition of the Barry Building as well as altering the Coral Tree Media neighborhood. Advocates voiced their opposition to the project which prompted then Councilmember Bill Rosendahl to voice his opposition. Throughout the EIR process, an alternative emerged that would have allowed for the retention and reuse of the Barry Building alongside proposed new development. The owner rejected this despite its alignment with identified project objectives. Unwilling to compromise or consider alternatives, in 2013 the owners requested to withdraw their zoning entitlements request, thus ending the Green Hollow Square Project.

In 2016, the property owners used seismic concerns as a means to evict its commercial tenants. Since their eviction the property has remained boarded up and neglected. Defining features that included metal window shutters have been removed or disappeared from the property. This action was not approved or reviewed by the City's Office of Historic-Cultural Monuments.

Such actions are undoubtedly demolition by neglect which occurs when property owners intentionally allow a historic property to suffer severe deterioration, potentially leading to its loss. Property owners who take this approach often use it as a means to circumvent historic preservation regulations and to later justify total demolition of historic resources. By allowing demolition by neglect, it is setting a dangerous precedent for future proposed demolitions of Los Angeles's historic resources. Such actions are occurring with increasing frequency and the City must stand firm in this case and pursue actionable demolition by neglect deterrents.

III. Alternatives to the proposed demolition of the Barry Building must be considered.

A key policy under the California Environmental Quality Act (CEQA) is the lead agency's duty to "take all action necessary to provide the people of this state with historic resources for future generations examples of major periods of California history." To this end, CEQA "requires public agencies to deny approval of a project with significant adverse effects when feasible alternatives or feasible mitigation measures can substantially lessen such effects."² The fact that an environmentally superior alternative may be more feasible than the proposed project does not necessarily render it infeasible under CEQA.³ Reasonable alternatives must be considered "even if they substantially impede the project or are more costly than the proposed project."⁴ Findings of alternative feasibility or infeasibility must be supported by substantial evidence.⁵

¹Public Resource Code, Sec. 21001 (b), (c).



19203.000 - 298458.2

effects when feasible alternatives or feasible mitigation measures can substantially lessen such effects."² The fact that an environmentally superior alternative may be more feasible than the proposed project does not necessarily render it infeasible under CEQA.³ Reasonable alternatives must be considered "even if they substantially impede the project or are more costly than the proposed project."⁴ Findings of alternative feasibility or infeasibility must be supported by substantial evidence.⁵

Demolition of the Barry Building without a replacement project is a blatant violation of CEQA. The proposed project is completely unnecessary and an effort to circumvent historic preservation regulation for its future development. It is the City's duty as the lead agency to deny the proposed project as stated by CEQA law.

As with the proposed Green Hollow Square Project, a preservation alternative remains feasible for the applicant. Such an alternative works in tandem with new development and new development are not mutually exclusive. Successful preservation for the Barry Building is a "win-win" solution whereby the historic building can be rehabilitated and new development may occur on the vacant portion of the parcel.

IV. Conclusion

The Conservancy strongly opposes the demolition of the historic Barry Building HCM #887. The proposed demolition with no replacement project is in strict violation of CEQA and must be denied by the lead agency. For nearly a decade the Conservancy has advocated for "win-win" solutions for the Barry Building and we remain committed to this effort.

The Conservancy urges the City of Los Angeles to reconsider its current environmental review process for this proposal as a replacement project is necessary, in addition to adaptive reuse alternatives. The proposed demolition of the Barry Building is unnecessary and will create a harmful precedent. Such a precedent undermines all efforts of historic preservation and the City's historic preservation program.

The Conservancy welcomes an opportunity to work with the City and the applicant to determine how potential preservation alternatives and a "win-win" outcome can be achieved.

About the Los Angeles Conservancy:

12/21/2020

City of Los Angeles Mail - Barry Building

The Los Angeles Conservancy is the largest local historic preservation organization in the United States, with nearly 5,000 members throughout the Los Angeles area. Es

² *Sierra Club v. Gilroy City Council* (1990) 222 Cal.App.3d 30, 41; also see Public Resources Code §§ 21002, 21002.1.

³ Guideline § 15126.6(a).

⁴ *San Bernardino Valley Audubon Soc'y v. County of San Bernardino* (1984), 155 Cal.App.3d 738, 750; Guideline § 15126(d)(1).

⁵ Public Resources Code § 21081.5.



19203.000 - 298458.2

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 contact me at (213) 430-4203 or afine@laconservancy.org should you have any questions or concerns.

Sincerely,

Lisa Avebury



James Harris <james.harris@lacity.org>

RE: DEIR Barry Building / "11973-11975 San Vicente Boulevard Project" DEIR (ENV-2019-6645-EIR) ... Truncated Email included in Appendix A-3 - NOP Comments

James Harris <james.harris@lacity.org>

Fri, Mar 24, 2023 at 1:25 PM

To: Ziggy Kruse <ziggykruse2005@yahoo.com>

Cc: Ziggy Kruse <ziggykruse2005@yahoo.com>, Bob Blue <bob.blue@live.com>, Jeff Khau <jeff.khau@lacity.org>

Good afternoon

I have attached the Los Angeles Conservancy's December 21, 2020, letter on the Notice of Preparation for the 11973 San Vicente Boulevard Draft EIR.

Thank you
Jim

LOS ANGELES
CITY PLANNING

Jim Harris

Major Projects

Los Angeles City Planning

221 N. Figueroa St., Room 1350

Los Angeles, CA 90012

T: (213) 978-1241 | Planning4LA.org



[Quoted text hidden]

**LA Conservancy.pdf**

279K



James Harris <james.harris@lacity.org>

RE: DEIR Barry Building / "11973-11975 San Vicente Boulevard Project" DEIR (ENV-2019-6645-EIR) ... Truncated Email included in Appendix A-3 - NOP Comments

Ziggy Kruse <ziggykruse2005@yahoo.com>

Fri, Mar 24, 2023 at 1:57 PM

Reply-To: Ziggy Kruse <ziggykruse2005@yahoo.com>

To: James Harris <james.harris@lacity.org>

Cc: Bob Blue <bob.blue@live.com>, Jeff Khau <jeff.khau@lacity.org>

Hello Mr. Harris:

Thank you for sending the letter.

Please let me know where this particular letter, dated December 21, 2020 and signed by Adrian Scott Fine can be found in the DEIR.

Thank you.

Sincerely,
Ziggy Kruse Blue

[Quoted text hidden]



James Harris <james.harris@lacity.org>

RE: DEIR Barry Building / "11973-11975 San Vicente Boulevard Project" DEIR (ENV-2019-6645-EIR) ... Truncated Email included in Appendix A-3 - NOP Comments

James Harris <james.harris@lacity.org>

Fri, Mar 24, 2023 at 2:29 PM

To: Ziggy Kruse <ziggykruse2005@yahoo.com>

Cc: Bob Blue <bob.blue@live.com>, Jeff Khau <jeff.khau@lacity.org>

Good afternoon

The letters on the Notice of Preparation / Initial Study are included as an appendix to the Draft Environmental Impact Report.

Here is the link to the landing page for the report:

- <https://planning.lacity.org/development-services/eir/11973-san-vicente-boulevard-project-0>

At the bottom of the page there is a drop-down menu for all appendices.

The comment letters are listed as Appendix A-3 NOP Comments.

Click on this appendix and then click on GO.

This will bring up all of the comment letters to the NOP/IS.

The Conservancy's letter you highlighted is on page 163 of that document.

Jim

**Jim Harris****Major Projects****Los Angeles City Planning**

221 N. Figueroa St., Room 1350

Los Angeles, CA 90012

T: (213) 978-1241 | Planning4LA.org

[Quoted text hidden]

March 27, 2023

Mr. James Harris
City of Los Angeles, Department of City Planning
221 N. Figueroa Street, Suite 1350
Los Angeles, CA 90012

Dear Mr. Harris,

I am writing to you to lend my support in protection of the Barry Building in Brentwood, California. The Barry Building is at 11973 San Vicente Boulevard and the project/Case No. is ENV-2019-6645-EIR.

The Barry Building is a Historic-Cultural Monument (HCM) and it needs to be protected. I am writing you to encourage you to protect and support one of the few historical buildings we have on the westside of Los Angeles. The dubious owners have used demolition by neglect ever since evicting the tenants to circumvent historic preservation protections. There are viable preservation alternatives to demolition that must be fully considered and explored before capitulating to their current request. If approved, the city will have awarded the owners for their bad behavior and set a precedent for future developers in the city. This kind of business practice is already happening around the city, and it needs to be stopped. You hold the cards here, let's not let ill-intentioned behavior win out. We need to send a message that the history of the city matters and that it is possible to have development and historical buildings at the same time. If they didn't want to save this building, they should have not purchased it. Saving this building will make Brentwood and other communities with historic buildings more interesting places to live in and visit. We have plenty of brand-new shopping developments, what we need is more education around why these buildings matter and how they will add to a sense of place. Please don't let this building be destroyed!

Under the California Environmental Quality Act (CEQA), the city is required to deny projects that have a feasible alternative. In this case, there are clear preservation alternatives that had been presented in the previous project proposals. It seems clear to the community that the owners are playing a waiting game and neglecting this important beautiful building. Shame on them! Please don't reward this kind of business practice.

Sincerely,

Christine Meleo Bernstein



B26 - Doucette

James Harris <james.harris@lacity.org>

PLEASE HELP SAVE THE BARRY BLDG. HISTORICAL CULTURAL MONUMENT # 8871 message

Daryl Doucette <dldoucette@msn.com>

Sun, Mar 26, 2023 at 8:29 PM

To: "james.harris@lacity.org" <james.harris@lacity.org>

PLEASE OPPOSE THE DEMOLITION OF THIS HISTORIC TREASURE!!

I ATTENDED YEARS OF UCLA'S ENVIRONMENTAL ARCHITECTURAL PROGRAM. THE DIRECTOR JODY GREENWALD, STRESSED THE IMPORTANCE OF PRESERVATION OF THESE FINE ARCHITECTURAL CLASSICS. WE HAVE TO FIGHT TO SAVE THESE FOR THE WORLD TO SEE EXAMPLES OF FINE AND CLASSIC DESIGN. WITHOUT THEM, WE HAVE ONLY DEVELOPMENT AND NO HISTORICAL REFERENCES.

IN ADDITION, I GREW UP IN THE AREA AND BRENTWOOD BOOKSTORE WAS ONE OF THE FEW FINEST PLACES IN WHICH TO ENJOY TRUE LITERATURE AND ART. THIS BUILDING NOT ONLY PROVIDES HISTORY, BUT MEMORIES OF A TIME WE NEED TO PRESERVE FOR FUTURE GENERATIONS TO BENEFIT FROM.

THANK YOU FOR YOUR KIND CONSIDERATION!

DARYL AND PAUL F. DOUCETTE



B27 - Dianne Kraus

James Harris <james.harris@lacity.org>

CASE # EBV-2019-6645 - THE BARRY BUILDING

1 message

diannekrausdesign@gmail.com <diannekrausdesign@gmail.com>
To: james.harris@lacity.org

Tue, Mar 28, 2023 at 8:25 AM

Dear Mr. Harris,

I am a previous retail tenant of the Barry Building . My ecofriendly store was in the Barry Building in 2009 until I was forced to vacate. I did very well with my store.

I purposely chose the Barry Building to have my store because it was in my neighborhood where I lived, and the building with its mid-Century architecture , the fabulous courtyard as well as its wonderful neighborhood community and other amazing tenants allowed my concept store to thrive.

I was deeply saddened when my lease was canceled and the owner Mr. Munger chose to let the property become derelict to the degree it is today where he wants to demolish this landmark .

During the time I had my retail store he let the plumbing go to hell, where we would have toilets that did not flush , no heat and no electricity at times. He was destroying the building deliberately.

He removed all of the historic features so that there would be no trace of this wonderful indoor outdoor courtyard .

The design that was once proposed in 2016 was awful and ugly and made no sense and did not integrate the Barry Building well at all .

How is it possible that he is allowed to demolish a Historic Cultural Monument?

There are so many wonderful things that can be done to preserve this building and make it thrive again.

The energy of my shop brought in so many wonderful customers and kept the neighborhood alive and a real sense of community existed because of the courtyard design. All of us were able to use this space and hold wonderful events and key thought leaders attended my outdoor events and ongoing sustainable design lectures . And we were all there for each other , keeping an eye on our shops and real friendships were built. You could not ask for a better retail situation.

It is criminal what Mr. Munger is doing !!!!

You must understand what it means to take everything away from Los Angeles and Angeleno's .

De voiding the city of the opportunity to have landmarks of this period in time is key to our future and our next generation who must understand the significance of this style of architecture , to understand sustainability , preservation and most importantly the environmental issues that are affected by this ridiculous idea that Mr. Munger wants to do and for no new

proposed plan. He wants to leave it an empty lot then sell the whole block in a few years and make more money that he already has . He and his family have no regard for the community and the impact it will have to the future of Brentwood .

Why must this be even an issue?

It is deemed A Cultural Significant Building . YOU MUST Work with the LA Conservancy and understand that there is a positive solution where we all can win.

As you know this is a blatant violation of the CEQA .

It is not worth destroying and demolishing a historic landmark to prove no point.

As a resident of this community it is my duty to let you know that I deny any proposed request to demolish the Barry Building .

Shame on Mr. Munger and the city for even considering this!

Do the right thing and don't allow the Barry Building to be demolished !!

Dianne Kraus



James Harris <james.harris@lacity.org>

Save the Barry Building

1 message

Emily Gustafson <erosewilliams@gmail.com>
To: james.harris@lacity.org

Fri, Mar 24, 2023 at 3:54 PM

Good afternoon James,

I spent several years working at the Barry Building when the Los Angeles Parks Foundation was a tenant. This Foundation is the nonprofit arm of the LA Building & Safety Dept, helping the City to raise funds for the city's parks. As a preservation enthusiast, I pinched myself daily for being able to wake up and go to work in such a unique and inspiring structure. I was shocked and sad when I heard the building, an HCM, was slated for demolition, and honestly enraged when they fenced it up and left it sitting for years, with no plans to restore it or reuse it for another purpose. I worked as an LA City intern and then as a private consultant on the SurveyLA project, which still remains my favorite project I've ever been a part of. I was born in LA and getting to survey my town and write reports on how and why these properties came to be inspired me to go to grad school to study planning. I had to be close to these properties, to save them, to promote them, to honor them. I am sure you feel the same way.

There are always feasible alternatives; can't this be used for temporary housing? Or a clinic? LA is in such dire need for infrastructure and programming for the homeless, and we have so many incredible historic structures needing a new purpose, yet we continue to throw away beautiful buildings like this one for reasons still unknown. When we say "yes" to demolishing these properties, we set a dangerous precedent. LA will one day become unrecognizable, and I know some people want that, and those people are winning with every demo. I want my future children to be able to fall in love with this city the way I did, but who knows if they will get to see it. It is our jobs as planners to protect and revitalize what can be saved and reused, and to demonstrate to others (especially naysayers) how to do it successfully.

We can't let the naysayers win. LA cares about its history. Don't let the greedy assholes erase it.

Thanks, James.

Emily Gustafson



James Harris <james.harris@lacity.org>

Save the Barry Building (Historical-Cultural Monument #877)

jw <jwilson2100@gmail.com>

Tue, Mar 28, 2023 at 12:54 PM

To: "james.harris@lacity.org" <james.harris@lacity.org>

Dear Mr. Harris,

We can't lose another Historical-Cultural Monument, especially one on the west side of Los Angeles. The cultural fabric of our great city depends on such historical buildings.

Please don't let developers destroy our past. That building is such a great example of mid-century. The fifties were the cornerstone to the growth of our great city; please don't let developers rob us of our past.

Thank you in advance.

Jeff Wilson



James Harris <james.harris@lacity.org>

Barry Building

1 message

J. Sharpe <sharpeworld@gmail.com>
To: james.harris@lacity.org

Sun, Mar 26, 2023 at 9:55 AM

Greetings!

I wanted to write to you about my strong opposition to the possible demolition of 11973 San Vicente Boulevard Project (Case No. ENV-2019-6645-EIR), also known as the Barry Building.

I've lived in the neighborhood most of my life, since the early 1970s, and find it heartbreaking to see the city considering condoning the willful negligence of a property owner deliberately aiming to circumvent historical landmark status. It seems like a dangerous precedent to set. So short sighted, when the preservation of a building like this can make the entire neighborhood more valuable by preserving at least some of its character and dignity, something people flock to in a world becoming overrun by anywhere USA development. I understand that progress is necessary, but there should be balance, too, and this building should stand as emblematic of that balance.

I hope you're able to make the right decision, and honor this building for its true value in the community.

Thank You,
Jennifer Sharpe



James Harris <james.harris@lacity.org>

Saving the Barry Building

Mary Melton <marymeltonla@gmail.com>

Fri, Mar 24, 2023 at 4:10 PM

To: james.harris@lacity.org, councilmember.park@lacity.org

I'm the fifth generation of my family to call Los Angeles home. This city, this place, means a tremendous amount to me, as I'm sure it does to both of you.

I live nowhere near the Barry Building, but know of it well—mostly as the home of the beloved Dutton's Books (I spent my high school years as a clerk at Dutton's), but also as an exemplary example of the midcentury modernism aesthetic that Los Angeles played a pivotal role in creating (and that I have written about often).

When I learned of the proposed demolition of the Barry Building, it felt all too familiar: another example of the city tearing down our history, tearing down a space that so beautifully signifies that play between indoor and outdoor space that this city is so known for. And tearing it down for....what? why?

I'd ask you: What is the point of city designated landmarks if in fact we can offer those landmarks no protection? How will you feel in your district when you walk or drive by the empty lot that will be left behind? As for what could replace it—do you think, in your heart, that the city needs another cookie-cutter development, an oversized box, a generic building that would replace a wholly unique, inviting, and *landmarked* structure?

I of course understand that all cities evolve and change, and that not all development should be opposed. What flummoxes me—as a lifelong Angeleno, and as the former editor-in-chief of Los Angeles magazine—is the easy disregard that city officials too often display for protecting our architectural history, and for preserving public/private spaces that—once they are gone—are impossible to replace.

Please reconsider this. I am sure the fine folks at the LA Conservancy can help facilitate an adaptive reuse of this space that could create a vital hub for your district—and be a great example that you could be proud of, of doing the right thing.

Sincerely,

Mary Melton

--

Mary Melton

Email: marymeltonla@gmail.com

Web: marymeltonla.com



James Harris <james.harris@lacity.org>

Barry Building preservation

1 message

Michael Hayes <michael@michaelhayes.la>

Sun, Mar 26, 2023 at 10:17 PM

To: James Harris <james.harris@lacity.org>

Cc: councilmember.park@lacity.org

Hello City Leaders,

I remember the first time I walked past the Barry building and immediately stopped to research it. Sadly, in LA, there are relatively few buildings with the power to make someone stop and appreciate it.

Admittedly, as someone who works in construction/ architecture, I'm generally in favor of new buildings, but that is not the case for this situation in which an architecturally significant building, whose style is so prominently linked to LA's architectural history, is in jeopardy because of "new development"

We're lucky to have several capable adaptive reuse designers and builders in this city that could allow the Barry building to carry-on its mid century legacy. It has so many unique features that could be highlighted as an asset for a new use or as incorporated into a larger project erected on the parking lot behind it.

Please express the public's interest in preserving this gem and the possibility of incorporating into something new.

Thanks,

-m



James Harris <james.harris@lacity.org>

Barry Building -11973 San Vicente Boulevard Project (Case No. ENV-2019-6645-EIR)

Nancy Newberg <nancy@newbergfamily.net>
To: james.harris@lacity.org

Mon, Mar 27, 2023 at 4:55 PM

Dear Mr. Harris,

I am writing to you to lend my support in protection of the Barry Building in Brentwood, California. The Barry Building is at [11973 San Vicente Boulevard](#) and the project/Case No. is ENV-2019-6645-EIR.

The Barry Building is a Historic-Cultural Monument (HCM) and it needs to be protected. I am writing you to encourage you to protect and support one of the few historical buildings we have on the westside of Los Angeles. The dubious owners have used demolition by neglect ever since evicting the tenants to circumvent historic preservation protections. There are viable preservation alternatives to demolition that must be fully considered and explored before capitulating to their current request. If approved, the city will have awarded the owners for their bad behavior and set a precedent for future developers in the city. This kind of business practice is already happening around the city, and it needs to be stopped. You hold the cards here, let's not let ill-intentioned behavior win out. We need to send a message that the history of the city matters and that it is possible to have development and historical buildings at the same time. If they didn't want to save this building, they should have not purchased it. Saving this building will make Brentwood and other communities with historic buildings more interesting places to live in and visit. We have plenty of brand-new shopping developments, what we need is more education around why these buildings matter and how they will add to a sense of place. Please don't let this building be destroyed!

Under the California Environmental Quality Act (CEQA), the city is required to deny projects that have a feasible alternative. In this case, there are clear preservation alternatives that had been presented in the previous project proposals. It seems clear to the community that the owners are playing a waiting game and neglecting this important beautiful building. Shame on them! Please don't reward this kind of business practice.

Sincerely,

Nancy Newberg



James Harris <james.harris@lacity.org>

**RE: "11973-11975 San Vicente Boulevard Project" DEIR (ENV-2019-6645-EIR) ...
Omission of Public Comment Letter in DEIR ...**

Ziggy Kruse <ziggykruse2005@yahoo.com>

Fri, Mar 24, 2023 at 5:13 PM

Reply-To: Ziggy Kruse <ziggykruse2005@yahoo.com>

To: James Harris <james.harris@lacity.org>

Cc: Ziggy Kruse <ziggykruse2005@yahoo.com>, Jeff Khau <jeff.khau@lacity.org>, Bob Blue <bob.blue@live.com>, "Idishman@laconservancy.org" <Idishman@laconservancy.org>, "afine@laconservancy.org" <afine@laconservancy.org>

Dear Mr. Harris,

The letter you emailed me is not the same as PDF page 163 of Appendix A-3, which you mentioned in your email.

In fact, the complete formatted letter that you emailed us today is dated **December 21, 2020** and is authored by **Adrian Scott Fine, Director of Advocacy of the Los Angeles Conservancy**.

It appears that this letter was omitted from the DEIR, Appendix A-3 - NOP Comments.

The PDF page 163 document you are referencing is an email from Lisa Avebury and is truncated on the right side of the document.

Also, I downloaded the entire DEIR from the Los Angeles City Planning Department's website once it was posted, which was on 02-16-2023, the date of the Notice of Completion.

Today, based on the letter provided by you, I conducted a thorough search through the entirety of the DEIR documents, including all appendices, in order to locate the letter from Adrian Scott Fine.

However, my search did not yield that letter in any of the documents.

I also checked the online documents, too, following the instructions you provided in your email.

Again, the only document on pdf page 163 is the truncated email I included as my attachment to you earlier today.

Based on the above, the City omitted the 12-21-2020 letter from **Adrian Scott Fine, Director of Advocacy of the Los Angeles Conservancy** in the DEIR and needs to include it.

Therefore, I am asking that:

1. the City Planning Department amend the DEIR and include any omitted letters, including the 12-21-2020 letter from the Los Angeles Conservancy, and
2. that the City Planning Department extends the public comment period on the DEIR for 30 days because of its omission of important comments submitted by members of the public.

Thank you.

Sincerely,
Ziggy Kruse Blue



James Harris <james.harris@lacity.org>

Barry Building (Historic-Cultural Monument #887)

1 message

Cathy Cohen <cathycohen@earthlink.net>
To: james.harris@lacity.org

Tue, Mar 28, 2023 at 4:09 PM

Dear Mr. Harris,

I'm writing to protest the proposed demolition of the Barry Building, a designated local landmark located on San Vicente Blvd. in Brentwood. This amazing building has been officially designated as Historic-Cultural Monument #887 by the City of Los Angeles. It should not be torn down!

I worked in the Barry Building for over 15 years as an assistant manager at Dutton's Brentwood Bookstore, and I can attest to its unique nature. The layout and design of the building, with the two curving, symmetrical staircases on either side of its beautifully landscaped central courtyard, leading to the exterior walkway with its iron railings all the way around the second level, provided a workplace like no other. The stores below and the upstairs offices all have large windows with views of the central courtyard. This led to a real sense of community between all the various tenants of the Barry Building. The bookstore and café were spread all around the ground floor, while above were architects, designers, dentists, psychotherapists, lawyers, and even one office housing our rare book room — the walls lined with rare and antiquarian volumes, a heavy wooden library table in the center.

The tenants couldn't have been more diverse in their interests, but the design of the building put us all in contact with one another on a daily basis as we made our way through the lovely environment it created. No stuffy high-rises or stifling interior hallways. The building forced us to be with nature and each other.

I recall many amazing events held there in the courtyard. Children's storytelling days with craft tables and one of us dressed up as the Cat in the Hat or Curious George roaming around taking pictures with the kids. A classical violinist on a Sunday afternoon. And in particular, a magical night with Carlos Fuentes reading by lamplight in the center of the courtyard and crowds of booklovers gathered around in the semi-darkness, including many of us sitting on the second floor walkway, our legs dangling through, or leaning over the railings in rapt attention.

The Barry Building allowed and encouraged and enhanced a real and significant sense of community. Architecture such as this must be preserved to serve as an example of how our built environment can create better ways to live and work together.

The owners of this building seem to be looking for some way to maximize their financial return from the property by letting it deteriorate over the last few years, even after the building's cultural and historical value has been certified by our city government. I find this deplorable. If they don't wish to invest in the upkeep of this monument, they have the option to sell it to someone who will seek to restore and preserve it. Demolition should be completely off the table.

Please! Save the Barry Building! (once more)

Thank you for your time and anticipated support.

Sincerely,

Cathy Cohen



James Harris <james.harris@lacity.org>

Barry Building- Historic-Cultural Landmark #887

1 message

Davida Rochlin <davidarochlin@gmail.com>

Tue, Mar 28, 2023 at 7:06 PM

To: "james.harris@lacity.org" <james.harris@lacity.org>

As a second generation Los Angeles architect whose firm, Davida Rochlin Architecture, was located at the Barry Building for 30 years, I have first hand experience of how a building can feed the soul and heart of its users. Open and friendly, its central courtyard with tropical landscape is a shining example of how building design can encourage a strong community. The building represents the best of mid-century modern architecture.

Preserving our cultural landmarks is vital for Los Angeles and the landmarked Barry Building is no exception. It is a testament to our city's architectural legacy and should not be demolished.

Davida Rochlin, AIA, LEED AP Homes, Living Future Accredited

Davida Rochlin Architecturewww.davidarochlin.com

310 923 1191 cell

March 23, 2023

James Harris
Los Angeles City Planning
221 N. Figueroa Street, Suite 1350
Los Angeles, CA 90012
E-mail: james.harris@lacity.org

Re: Support for the Barry Building Demolition

Dear James,

On behalf of myself, a former long-time resident in the area, and FH Vicente, LLC a property and business owner down the street on San Vicente, I am writing to express my strong support for the demolition of the Barry Building.

The San Vicente Corridor should be a prosperous, safe, clean and beautiful commercial district within Brentwood. The current site's condition promotes the exact opposite and is an embarrassment to our community and City.

The Barry Building being vacant is horrible for Brentwood and Brentwood's business community. The fenced building is ugly and a magnet for vandalism and homelessness and is a nuisance to everyone except for the NIMBYS of the world who care about no one but themselves.

The Barry Building site creates a blank canvass for a new opportunity and future development that will revitalize San Vicente and Brentwood. In fact, most of the San Vicente Corridor needs a major facelift and should be upzoned to incentivize much needed new pedestrian active housing and retail around a transit corridor. We need more housing, active retail, walking and activity, and less fenced off dark buildings, bureaucracy, delays, and costs.

Sincerely,



FH Vicente, LLC
Eran Fields



James Harris <james.harris@lacity.org>

Comment on ENV-2019-6645-EIR

1 message

Richard Stein <rstein@uoregon.edu>

Tue, Apr 18, 2023 at 12:25 PM

To: james.harris@lacity.org

Cc: councilmember.park@lacity.org, Jeff.Khau@lacity.org

Dear Mr. Harris,

I am writing to object in the strongest possible terms to the proposed demolition of the Barry Building (11973 San Vicente Blvd, 90049)--ENV-2019-6645-EIR. Put most simply, my objection centers on the building's historic, architectural and cultural significance. Officially designated as a Los Angeles Historic-Cultural Monument, it is, I believe, an important work of mid-century modernism, one of the last remaining examples of a building movement for which Southern California was noted and one that helped mark the diverse residential and commercial character of the Brentwood community itself. Destroying this building would be an unfortunate and irreversible loss, for our local community and for Los Angeles in general.

I grew up in Brentwood, and was a resident when the Barry building was constructed. I remember it as a lively center of varied commercial activity, long predating the beloved Dutton's Books. It was always unusual, even before Dutton's, and that contributed to its vitality and charm: a collection of shops and offices arranged around a courtyard that provided an outdoor feeling for indoor activities and a leafy rest area for tenants, visitors, and passers-by. Charles Eames would have called that combination of spaces a "shock absorber" (and I should note that I am a Docent at the Charles and Ray Eames House in Pacific Palisades). It's a combination that probably would not have been possible anywhere else: a classic version of Southern California mid-century modernism. Even in its last days, before the building was allowed to fall into complete disrepair by the current owners, it continued to serve as a vibrant and varied commercial space. Duttons Books took advantage of its variety to create a distinctive, rambling bookshop that spread across a series of disconnected rooms--one example of how much this building was and is suited to creative adaptation.

Such creativity is needed now, to preserve the core of the Barry Building with or without added commercial space. This could mean adopting any of the first three Alternatives in the current DEIR, and perhaps #s 2 & 3 in particular. The owner insists that these are too expensive. I would argue that the aesthetic and community gains, over the long term, are worth the necessary short-term capital infusion. It is true that to preserve and/or adapt the Barry Building would require a significant investment, and soon--in order to comply with the City's Soft Story Ordinance. The owner essentially views this as an investment in the past. I consider it an investment in the future, in the preservation not just of a single building but of the varied and distinctive character of Brentwood and Los Angeles, a way to interrupt the increasing homogenization of commercial and residential space across the city.

In short, it is a building we cannot afford to lose.

[One footnote to the above. My characterization of the views of the owner of the Barry Building is based on a Zoom meeting yesterday between the owner's representatives and members of the Land Use Committee of the Brentwood Community Council. I am a member of both groups, although in this letter I am speaking only for myself.]

Thank you for considering my views,

Richard Stein

373 N. Kenter Ave.
Los Angeles CA 90049

310-824-3382

James Harris
Los Angeles City Planning
221 N. Figueroa Street, Suite 1350, Los Angeles, CA 90012
E-mail: james.harris@lacity.org

Dear Mr. James Harris and LA City Planning:

I am writing to express my strong support for the demolition of the Barry Building. The Barry Building is structurally unfit and is likely to suffer severe damage in an earthquake. For the safety of the community, the building should be demolished.

I understand that some may have sentimental attachments to the Barry Building, but I believe that we must prioritize safety over nostalgia. It is time to look to the future and embrace change, and the demolition of the Barry Building is a necessary step in that direction.

Thank you for your attention to this matter, and I urge you to support the demolition of the Barry Building.

Sincerely,

A handwritten signature in black ink, appearing to read 'Irina'.

Irina Berchik
Brentwood Resident



James Harris <james.harris@lacity.org>

Demolition of the Barry Building - Letter of Support (Irina Berchik)

IRINA BERCHIK <berchiki@aol.com>

Thu, Apr 6, 2023 at 2:40 PM

To: James Harris <james.harris@lacity.org>

Cc: Mike Ai <mike@afriat.com>

Honestly - that building is like a scary thing in the middle of nice neighborhood and noone wants to walk by and pass it, because it feels its from horror movies where you would think some murders happen or something like that. Whenever I have to walk over to Vicente foods - I always try to take the other side of the street. It needs to go.

Irina Lexandra Berchik
Esthetician Owner Educator

Spa ViolaSole
11677 San Vicente Blvd., Ste.300
Los Angeles, CA 90049
(310) 442-4646
Lex@spaviolasole.com
www.spaviolasole.com

On Apr 6, 2023, at 13:39, James Harris <james.harris@lacity.org> wrote:

[Quoted text hidden]

[Quoted text hidden]

[Quoted text hidden]

<image001.png>

<image002.png>

[Quoted text hidden]



James Harris <james.harris@lacity.org>

Barry Building - Public Comment

1 message

Anthony Yannatta <anthony@tsahousing.com>
To: "james.harris@lacity.org" <james.harris@lacity.org>

Wed, Apr 5, 2023 at 3:06 PM

Dear Mr. Harris,

I am writing to provide public comment on the demolition Barry Building on San Vicente Blvd.

As a community member of Brentwood (and a frequent customer of the Dutton's bookstore) I strongly recommend approving the demolition of the Barry Building.

As a child my father lived at the corner of Montana and Gretna Green. I have worked for the past 15 years at the 11800 block of San Vicente.

Innovative and inspiring development along San Vicente between Bundy and Montana is sorely needed. The Barry Building site represents a cornerstone location that can inspire the entire streetscape. And the Munger family's resources should be seen as a catalyst towards redevelopment.

Yes, the Dutton's bookstore was a community landmark. Yes, it was a community resource that cultivated a love for reading amongst the young in Brentwood. The same experience can now be found at Diesel bookstore at the Brentwood County Mart a few miles to the west.

Please approve the demolition of the Barry Building.

Thank you,

Anthony Yannatta



James Harris <james.harris@lacity.org>

Brentwood's Barry Building

1 message

Mara Fisher <maras.sher.fisher@gmail.com>
To: james.harris@lacity.org

Mon, Apr 3, 2023 at 9:56 PM

Dear Mr. Harris,

I'm writing to express my support of the Los Angeles Conservancy in calling for the protection of the Barry Building, which is a Historic-Cultural Monument (HCM). The Conservancy strongly opposes this project and the needless demolition of this and any other designated landmarks when there are viable preservation alternatives to demolition that must be fully considered and explored.

Under the California Environmental Quality Act (CEQA), the City is required to deny projects that have feasible alternatives. In this case, there are clear preservation alternatives that have been presented in previous project proposals.

Furthermore, the building's owners have used demolition by neglect since evicting tenants to circumvent historic preservation protections. If approved, the City will have awarded the owners for their bad behavior. We can't allow this to happen.

The Conservancy strongly believes that the Barry Building could and should be adaptively reused. During the previous environmental review process, the Conservancy advocated for the building's adaptive reuse and objected to the unnecessary removal of the historically designated coral trees, which would have compromised the uninterrupted, linear nature of the median.

Allowing the demolition of a designated HCM is exceedingly rare and sets a bad precedent. Out of more than 1,200 HCMs in Los Angeles, only around half a dozen have been demolished purely for new development. Demolishing the Barry Building would be unnecessary, misguided, and detrimental to the City's program of local landmarks.

Thank you for your time.

Mara Fisher
Lincoln Heights, Los Angeles, CA

Mara Fisher
w. mara-fisher.com
e. maras.sher.fisher@gmail.com
c. 310-569-8940



James Harris <james.harris@lacity.org>

The Barry Building

1 message

Waide Riddle <riddlewaide@gmail.com>
To: james.harris@lacity.org

Sun, Apr 2, 2023 at 1:08 PM

Hello James!
Please SAVE The Barry Building!
The architecture of an erstwhile building should NOT be forgotten and bulldozed, but rather celebrated and enjoyed by future generations. Let's save it! We can make it happen! Figure out a way! We can do it!
Sincerely,
Waide Riddle
310-923-1129

--



Waide Riddle
Author/Writer

310-923-1129 | www.amazon.com/author/waideriddleriddlewaide@gmail.com

PO Box 691882, West Hollywood, CA 90069

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James Harris <james.harris@lacity.org>

Comment Period Extension for the Barry Building Draft EIR

Tom Safran <tom@tsahousing.com>
To: James Harris <james.harris@lacity.org>

Thu, Mar 30, 2023 at 4:13 PM

Dear Mr. Harris,

I hope I can make my comment through this email and that it be part of the record.

I've reviewed the EIR and strongly recommend approving the demolition of the Barry building. I have lived and worked within a block of this building for over 30 years. My former office was at 11812 San Vicente Blvd. About four years ago, we completed the construction of our own office building at [11811 San Vicente Blvd](#). My home is about one block west and north of the property at [627 South Saltair Avenue](#). I walk or ride my bike or drive by this property all the time. Sometimes 10 times a day. The building is an example of 50's architecture. But it was never special. I sat on the Architectural Review Board for San Vicente for 15 years. The late 80's to the early 00's. I don't remember anyone speaking very fondly of the building during my time on the Board.

The building was never well maintained. There was no good reason to have made the building a cultural monument. Why was it done? Per the late Councilman Rosendahl and some activists in Brentwood: To slow Charley Munger down. To make it harder for him to get a permit. That he often acted as a bully to get his way. And that Dutton's bookstore had been on the ground floor for years and was considered an institution in the community. But Doug Dutton wasn't a good businessperson. He invested and lost in a bookstore in Beverly Hills. He ran the one in Brentwood totally inefficiently in four separate areas on the site...which required at least four full time people to watch the areas. And what did Charley Munger do? He helped bail Dutton out of his financial problems.

And what has the community got in return? An eyesore and the lack of redevelopment of this wonderful property.

The Brentwood community deserves the redevelopment of this site...and to give the prospective new ownership the complete property to develop.

Thank you.

Sincerely,

Tom Safran

Thomas L. Safran

11811 San Vicente Blvd.

Los Angeles, CA 90049

(310) 820-4888

From: James Harris <james.harris@lacity.org>

Sent: Thursday, March 30, 2023 8:00 AM

To: James Harris <james.harris@lacity.org>

Subject: Comment Period Extension for the Barry Building Draft EIR

You have requested to be listed as an Interested Party to or have commented upon Case Number ENV-2019-6645-EIR for the property located at **11973 San Vicente Boulevard**, known as the Barry Building.

[Quoted text hidden]

[Quoted text hidden]



James Harris <james.harris@lacity.org>

Case Number: ENV-2019-6645-EIR

1 message

Kevin Johnson <kevinshmuelljohnson@gmail.com>
To: james.harris@lacity.org

Fri, Mar 31, 2023 at 12:58 PM

Case Number: ENV-2019-6645-EIR
Council District: 11 - Park
State Clearinghouse Number: 2020110210
Community Plan Areas: Brentwood-Pacific Palisades
Project Location: [11973 – 11975 San Vicente Boulevard, Los Angeles, California 90049](#)

No justification for this - the site is perfect for reuse. 30-year resident. Opposed.

Thank you.

Kevin Johnson



James Harris <james.harris@lacity.org>

Barry Building-11973 San Vicente Boulevard Project (Case No. ENV-2019-6645-EIR)

1 message

Fredrik Nilsen <fn@nilsenstudio.com>

Wed, Mar 29, 2023 at 3:28 PM

To: james.harris@lacity.org

Dear Mr Harris

I am writing to you to lend my support in protection of the Barry Building in Brentwood, California. The Barry Building is at [11973 San Vicente Boulevard](#) and the project/Case No. is ENV-2019-6645-EIR.

The Barry Building is a Historic-Cultural Monument (HCM) and it needs to be protected. I am writing you to encourage you to protect and support one of the few historical buildings we have on the westside of Los Angeles. The dubious owners have used demolition by neglect ever since evicting the tenants to circumvent historic preservation protections. There are viable preservation alternatives to demolition that must be fully considered and explored before capitulating to their current request. If approved, the city will have awarded the owners for their bad behavior and set a precedent for future developers in the city. This kind of business practice is already happening around the city, and it needs to be stopped. You hold the cards here, let's not let ill-intentioned behavior win out. We need to send a message that the history of the city matters and that it is possible to have development and historical buildings at the same time. If they didn't want to save this building, they should have not purchased it. Saving this building will make Brentwood and other communities with historic buildings more interesting places to live in and visit. We have plenty of brand-new shopping developments, what we need is more education around why these buildings matter and how they will add to a sense of place. Please don't let this building be destroyed!

Under the California Environmental Quality Act (CEQA), the city is required to deny projects that have a feasible alternative. In this case, there are clear preservation alternatives that had been presented in the previous project proposals. It seems clear to the community that the owners are playing a waiting game and neglecting this important beautiful building. Shame on them! Please don't reward this kind of business practice.

All my best,
Fredrik

FREDRIK NILSEN STUDIO[620 Moulton Ave, STE 203](#)[Los Angeles, CA 90031](#)

(323) 276-0736 (studio)

(310) 717-6922 (mobile)

www.nilsenstudio.comfn@nilsenstudio.com[@fredriknilsenstudio](#)



James Harris <james.harris@lacity.org>

11973 San Vicente Blvd

1 message

John Sherwood <jsherwd@gmail.com>
To: James Harris <james.harris@lacity.org>

Thu, Mar 30, 2023 at 9:56 AM

Dear Sir,

I am writing to oppose the demolition of the Barry Building. It is the only remaining significant piece of architecture that speaks to the character of that neighborhood. It's well worth preserving.

John Sherwood
633 Greenleaf Canyon Road
Topanga, CA 90290
310/455-2771



James Harris <james.harris@lacity.org>

Landmark Building on San Vicente Targeted for Demolition

1 message

Anna Hashmi <anna@thecornershop.tv>
To: james.harris@lacity.org

Mon, Apr 3, 2023 at 5:37 AM

Dear James,

New and bigger is not always better. That is why I am writing to you regards the landmark building on San Vicente targeted for demolition.

When I first moved to Brentwood this little mall was a hive of activity. A meeting place for coffee, a dentist surgery, a furniture store and offices. There were places to sit and marvel at the beautiful mid-century design of the venue that served the community with beautiful greenery and trees.

Driving past this area was also a delight, to look at this aesthetically pleasing little mall that didn't dominate the road and cast a deep shadow over the street with its multi-storied generic design. This was always a place of beauty, that preserved one of the best design eras in American Architecture.

This era of design defines what was and is great about Los Angeles. When thoughtful design considered the climate of outdoor/ indoor design. These designs are important to preserve the history of the city, and the wonderfully creative period of mid century design that is synonymous with Los Angeles.

As these buildings are left to decline, so that investors can have them deemed unsafe and then demolish them to create bigger, and brand new developments. I really think you should ask - at what cost?

Demolishing your city's most historical and important buildings will only lead to a generic looking city, devoid of character and style.

I join with other Brentwood residents to ask you to protect this structure and continue to persevere the historical building that have made Brentwood special.

Thank you.

anna

ANNA HASHMI
BRENTWOOD RESIDENT



James Harris <james.harris@lacity.org>

Brentwood's Barry Building

1 message

John Crues <john@crues.com>
To: james.harris@lacity.org

Sat, Apr 1, 2023 at 12:38 PM

Mr. Harris:

I know this building has been designated as a historic-cultural monument number 887, this building is an eye sore and should be demolished.

John Crues

PACIFIC EQUITY PROPERTIES INCORPORATED

April 12, 2023

James Harris
Los Angeles City Planning
221 N. Figueroa Street, Suite 1350
Los Angeles, CA 90012
E-mail: james.harris@lacity.org

Re: Pacific Equity Properties, Inc. supports the Barry Building demolition

On behalf of Pacific Equity Properties, Inc. I am writing to express Pacific Equity's strong support of the demolition of the Barry Building.

Pacific Equity is the owner of the properties on the northeast corner of San Vicente and Barrington, including the tenants: Starbucks, Pressed Juicery, E*Trade and Rag & Bone. The Barry Building being a vacant and seismically unstable building is not good for Brentwood and Brentwood's business community. The fenced building is a magnet to vandalism and homelessness and is a nuisance to the commercial businesses on San Vicente Blvd. The risk of collapse due to an earthquake is also dangerous for its neighboring businesses. The Barry Building is an eyesore, unsafe, and unclean and is a detriment to residents and businesses alike.

This demolition of the Barry Building creates a blank canvas for a new opportunity and a future development which has the potential to reinvigorate San Vicente Blvd.'s commercial district. Pacific Equity stands in firm support of the demolition of the Barry Building.

Sincerely,

Bryan Gordon

Pacific Equity Properties, Inc
CEO



James Harris <james.harris@lacity.org>

Comment on Case ENV-2019-6645-EIR

Josh Stephens <jrstephens@gmail.com>
To: james.harris@lacity.org

Wed, Apr 12, 2023 at 9:15 PM

Dear James,

I support the demolition of the Barry Building, case ENV-2019-6645-EIR.

Currently, the property imposes adverse environmental impacts on the community. It is an eyesore, a fire danger, and a temptation to vagrants and vandals. Indirectly, it stands in the way of productive redevelopment, be it for commercial or residential use.

I urge the city to certify the EIR and facilitate demolition posthaste.

I write this as a lifelong Brentwood resident who has fond memories of the building and the businesses that used to occupy it. Its time is long past, and it is beyond repair.

Thank you.

-Josh Stephens
90049



James Harris <james.harris@lacity.org>

11973 San Vicente Project - extension of public comment period2 messages

Barbara Roll <bsroll@live.com>
To: james.harris@lacity.org

Thu, Apr 13, 2023 at 9:06 AM

Mr. Harris:

Is there a link or e mail address where residents may send their public comments for this project? The original end date for public comment was April 3, but I have been advised that the date was extended to April 18, 2023.

If you would kindly provide the link and/or e mail for public comment on this project, I would be grateful.

Thank you,

Barbara Roll

James Harris <james.harris@lacity.org>
To: Barbara Roll <bsroll@live.com>

Thu, Apr 13, 2023 at 9:11 AM

Good morning,

You are correct, the comment period has been extended to Tuesday, April 18, 2023, at 4:00 p.m.

All comments may be sent to myself:

email - James.Harris@lacity.org or

address - 221 N. Figueroa St., Room 1350, Los Angeles, CA 90012

Thank you

Jim

**Jim Harris****Major Projects****Los Angeles City Planning**

221 N. Figueroa St., Room 1350

Los Angeles, CA 90012

T: (213) 978-1241 | Planning4LA.org

[Quoted text hidden]



James Harris <james.harris@lacity.org>

11973 San Vicente Blvd.

1 message

Byrdie Lifson Pompan <blp1966@gmail.com>
To: james.harris@lacity.org

Fri, Apr 14, 2023 at 7:52 AM

I live behind the property on Saltair Terrace. Please tear the building down and fence it properly. We have had a serious vagrant issue. The owners of this property must be made accountable to make sure that their property does not become a park land for more homeless people. There must be appropriate fencing, and lighting and periodic security.

Byrdie Pompan
11911 Saltair Terrace
310-991-1010



James Harris <james.harris@lacity.org>

ENV -2019-6645-EIR

1 message

Carolyn Jordan <cjordan@glaserweil.com>

Thu, Apr 13, 2023 at 11:35 PM

To: "james.harris@lacity.org" <james.harris@lacity.org>

I am writing in regard to the draft Environmental Impact Report for the Barry Building, in connection with the demolition permit being sought. I am sharing my personal opinion and not that of any group with which I may be affiliated. It is my personal opinion that the Barry Building should never have received cultural landmark status; at the time, it was a misguided effort by some community members to save the beloved tenant, Dutton's Books, by halting the larger project to build on that site. Dutton's Books still failed, and the building is also failing structurally, is an eyesore, and is potentially dangerous to the community in its current dilapidated condition. I worry about unhoused breaking in, starting a warming fire, and burning the whole place up. This building is not a shining example of any form of architecture, and while there may be a "significant impact" to tear it down, in this instance it would have a significantly positive impact. The only humane thing to do at this time is to tear down the building, clear the lot, and at some later point in time bring in new ownership with a project and vision to energize that part of San Vicente for the Brentwood community.

I hope that the demolition permit is granted and the owner allowed to raze the structure and clear the blight. Not only does the owner need that, San Vicente needs that.

Thank you.

Carolyn Jordan

Resident, Brentwood.

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James Harris <james.harris@lacity.org>

Barry Building

1 message

Corin L. Kahn <clkesq@outlook.com>

Thu, Apr 13, 2023 at 5:36 PM

To: "james.harris@lacity.org" <james.harris@lacity.org>

Cc: Bob Blue <bob.blue@live.com>, Ziggy Kruse <ziggykruse2005@yahoo.com>

Good day Mr. Harris: I am reviewing the DEIR and other materials prepared in connection with the proposed demolition of the Barry Building, I do not see the proposed mitigation program or proposed statement of overriding considerations that the DEIR admits will be required to approve the permit and certify compliance with CEQA. Would you kindly send me the links I need to access those materials? I thank you in advance for your cooperation.

--

PLEASE NOTE MY NEW CONTACT INFORMATION:**Corin L. Kahn, Esq.**

401 Wilshire Blvd

12th Floor

Santa Monica, CA | 90401

Office: 424-252-4714

Email: clkesq@outlook.com



James Harris <james.harris@lacity.org>

Barry building

1 message

DM Stenlake <dharmadm@yahoo.com>
To: james.harris@lacity.org

Thu, Apr 13, 2023 at 10:25 PM

We need to

Move forward and come to an agreement on an improvement of this property. I have no problem with demolition however, concerns about the use, height, parking etc for the property.

Always believe something good is about to happen 🌻



James Harris <james.harris@lacity.org>

DEIR of Barry Building , Brentwood

1 message

Nancy Freedman <gjf165@gmail.com>
To: james.harris@lacity.org

Fri, Apr 14, 2023 at 11:25 AM

Case Number: ENV-2019-6645-EIR

Dear Mr. Harris,

As residents of Brentwood , we have followed the history of this building since it was presented to the Brentwood Community Council to be developed by Mr. Munger. Eventually it was given monument status.

Mr. Munger would not agree to future incorporation of the building in to any other scheme after being made a monument status. The City and Ken Bernstein made it very difficult to move it to any other site. There was an opportunity to use the building as a potential library for a public school one block away, but we were told the Barry Building had to be next to a large parking lot to be relevant to the setting as it sits today. There was no parking lot at the school and a very unfortunate missed opportunity for everyone concerned.

Thus, there was a waiting period to demolish a building if it is not capable of being renovated and that is how we find this to be with the community having waited way too long to have it gone. The building is not built to the present code and electrical and plumbing need to be totally replaced. The building is not suitable for renovation, restoration or rehabilitation. Additionally, the building has been determined to be not structurally sound and will not withstand an earthquake, which is why it was closed.

The open space and deteriorating building has blighted the block it sits on and ruined business for years while also attracting homeless and gophers which negatively affect our Cultural Monument #148...Coral Trees.. There is nothing in the building that would not need complete revamping and at that, there are only a few portions that have merit such as a patio.

We are for the demolition of the Barry Building as soon as possible and new life breathed in to this property.

Sincerely,

Nancy and Gary Freedman



James Harris <james.harris@lacity.org>

Demolition of Barry Building at 11973 San Vicente Boulevard

1 message

Roz Gamble <rgamble@motorcyclegroup.com>
To: "james.harris@lacity.org" <james.harris@lacity.org>

Sun, Apr 16, 2023 at 10:01 AM

Dear Mr. Harris:

I am a resident of Brentwood for the past 35 years at the cross street of San Vicente and Montana (opposite the Tom Safran building). I support conservative development of Brentwood. The Barry Building is an eyesore and has been for years before it was fenced off. It's time it was demolished and a structure with more use to the residents erected in its place. The owner presented an attractive development plan some years ago that provided boutique shops, an open space for sitting and a post office. Residents need these facilities. Its designation as a cultural landmark is misguided and it has outgrown its use.

Please approve the demolition plan.

Sincerely

Roz Gamble | Vice President Corporate Operations & HR

10866 Wilshire Blvd. Ste.800 | Los Angeles, CA 90024

P: 310-601-4779 | C: 310-345-0852 | F: 213-423-7995 rgamble@motorcyclegroup.com

www.MotorcycleGroup.com

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James Harris <james.harris@lacity.org>

Re: Questions regarding Environmental Impact Report (DEIR) for ENV-2019-6645-EIR; SCH 2020110210; 11973 San Vicente Boulevard Project

Ziggy Kruse <ziggykruse2005@yahoo.com>

Fri, Apr 14, 2023 at 7:40 PM

Reply-To: Ziggy Kruse <ziggykruse2005@yahoo.com>

To: James Harris <james.harris@lacity.org>

Cc: Jeff Khau <jeff.khau@lacity.org>, Bob Blue <bob.blue@live.com>, "vince.bertoni@lacity.org" <vince.bertoni@lacity.org>

Hello Jim:

This is a quick follow up to our phone conversation from March 29, 2023.

During the conversation you told us that you would respond to our email from March 27, 2023 in writing and after conferring with other members in your office since this type of project does not happen very often. (ENV-2019-6645-EIR, Demolition of an HCM without any "further development of the site").

In short: Destroying a Historic-Cultural Monument and leaving in its place a vacant dirt lot as well as the existing surface parking lot.

However, as of today, April 14, 2023, we have not received any answers to the questions listed in the 03/27/2023 email.

Please provide the requested information without any further delay, especially since the Public Comment Period on the DEIR for this project ends on Tuesday, April 18, 2023.

Thank you.

Sincerely,
Ziggy and Bob Blue

On Wednesday, March 29, 2023 at 07:39:34 AM PDT, Ziggy Kruse <ziggykruse2005@yahoo.com> wrote:

Good morning, Mr. Harris:

Please respond to the below listed questions today. Thank you.

Sincerely,
Ziggy Kruse Blue

Sent from Yahoo Mail on Android

----- Forwarded Message -----

From: "Ziggy Kruse" <ziggykruse2005@yahoo.com>**To:** "James Harris" <james.harris@lacity.org>**Cc:** "Bob Blue" <bob.blue@live.com>, "Ziggy Kruse" <ziggykruse2005@yahoo.com>**Sent:** Mon, Mar 27, 2023 at 7:16 PM**Subject:** RE: Questions regarding Environmental Impact Report (DEIR) for ENV-2019-6645-EIR; SCH 2020110210; 11973 San Vicente Boulevard Project

Dear Mr. Harris:

In regard to the above referenced project ENV-2019-6645-EIR we would appreciate it if you could clarify the process for this case as the applicant is not seeking any entitlements.

1. Are there only two discretionary matters: demolition permit and CEQA? Or are there other discretionary actions involved with this project?
2. What is the required review procedure for this project?
3. Does this automatically go to the Cultural Affairs Commission? Can it be appealed to the Cultural Affairs Commission?
4. What are the appeal opportunities, ie:
 - a. Zoning Administration?
 - b. Area Planning Commission?
 - c. Full Planning Commission?
 - d. City Council?
5. Does the record for the DEIR and the Demo automatically include the prior project and environmental documents (Green Hollow Square, ENV-2009-1065-EIR)? Or do we need to take steps to include that material into the record?
6. Is the [11973 San Vicente Boulevard](#) Project scheduled for the Design Review Board? And if so, what is the date?
7. Is the [11973 San Vicente Boulevard](#) Project scheduled for any other review? And if so, what is the date?

We would like to receive answers to the above inquiries as soon as possible. Thank you.

Sincerely,
Ziggy and Bob Blue



James Harris <james.harris@lacity.org>

11973 San Vicente

1 message

B. Aviva Hayempour <bhayempour@gmail.com>
To: james.harris@lacity.org

Mon, Apr 17, 2023 at 8:54 PM

Hello. It's time to move on from the past into the future. Our neighborhood needs new life breathed into it. It's time to demolish this building and build! Thank you.

--

B. Hayempour

SC 1 - Lewis

KEEP OUR NEIGHBORHOOD SAFE

☒ YES, I support the safe demolition of the Barry Building at 11973-11975 San Vicente Boulevard, Los Angeles, California, 90049.

☐ YES, I would like to learn more about the safe demolition of the Barry Building. Please add me to your mailing list and keep me informed.

NAME: Frederick Lewis
ADDRESS: 11909 Montana #303
CELL: _____
EMAIL: FrederickLewis@gmail.com

QUESTIONS/COMMENTS:

It's Bull... that the Bldg is culturally important or historic... as common as Starbucks... It's just a vacant Bldg inhibiting some future nice future building like a hotel. One vacant lot with a boarded up bldg is an eyesore!

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SC 2 - Neiman

KEEP OUR NEIGHBORHOOD SAFE

☒ YES, I support the safe demolition of the Barry Building at 11973-11975 San Vicente Boulevard, Los Angeles, California, 90049.

☐ YES, I would like to learn more about the safe demolition of the Barry Building. Please add me to your mailing list and keep me informed.

NAME: Catherine NEIMAN
ADDRESS: 11970 Montana AVE. #108 Los Angeles, CA 90049
CELL: (310) 429-1536
EMAIL: Cathy_Neiman@yahoo.com

QUESTIONS/COMMENTS:

A Vacant Building for 6 years... Anywhere in Los Angeles is never a good thing even w/ 24 Security... It is inevitable that something bad will happen... Why are we waiting for this? Please demolish this building!

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SC 3 - Marcus

KEEP OUR NEIGHBORHOOD SAFE

☒ YES, I support the safe demolition of the Barry Building at 11973-11975 San Vicente Boulevard, Los Angeles, California, 90049.

☐ YES, I would like to learn more about the safe demolition of the Barry Building. Please add me to your mailing list and keep me informed.

NAME: Barbara Marcus
ADDRESS: 517 Westgate
CELL: _____
EMAIL: _____

QUESTIONS/COMMENTS:

No one's going to buy it - so demo already. Put something in it's place it's time.

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SC 4 - Lasseigne

KEEP OUR NEIGHBORHOOD SAFE

☒ YES, I support the safe demolition of the Barry Building at 11973-11975 San Vicente Boulevard, Los Angeles, California, 90049.

☐ YES, I would like to learn more about the safe demolition of the Barry Building. Please add me to your mailing list and keep me informed.

NAME: Loretta Lasseigne
ADDRESS: 11970 Montana Ave #307
CELL: 310 430-5522
EMAIL: LL1213X@aol.com

QUESTIONS/COMMENTS:

More along already knock it down. It's time to build something new!

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SC 5 - Kentros

KEEP OUR NEIGHBORHOOD SAFE

☒ YES, I support the safe demolition of the Barry Building at 11973-11975 San Vicente Boulevard, Los Angeles, California, 90049.

☐ YES, I would like to learn more about the safe demolition of the Barry Building. Please add me to your mailing list and keep me informed.

NAME: Angeliki Kentros
ADDRESS: 11907 Carkham Ave 2
CELL: _____
EMAIL: _____

QUESTIONS/COMMENTS:

Can't believe not taken down already. Doesn't seem historic - time for it to go already

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SC 6 - Illegible

KEEP OUR NEIGHBORHOOD SAFE

☒ YES, I support the safe demolition of the Barry Building at 11973-11975 San Vicente Boulevard, Los Angeles, California, 90049.

☐ YES, I would like to learn more about the safe demolition of the Barry Building. Please add me to your mailing list and keep me informed.

NAME: AM
ADDRESS: _____
CELL: _____
EMAIL: _____

QUESTIONS/COMMENTS:

it's unsafe
Time to go

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SC 7 - Arredondo

KEEP OUR NEIGHBORHOOD SAFE

☒ YES, I support the safe demolition of the Barry Building at 11973-11975 San Vicente Boulevard, Los Angeles, California, 90049.

☐ YES, I would like to learn more about the safe demolition of the Barry Building. Please add me to your mailing list and keep me informed.

NAME: Claudia Arredondo
ADDRESS: 11911 Gorkham Ave.
CELL: 310-447-5192
EMAIL: ClaudiaArredondo@aol.com

QUESTIONS/COMMENTS:

Better to be safe
and taken down

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SC 8 - Jenson

KEEP OUR NEIGHBORHOOD SAFE

☒ YES, I support the safe demolition of the Barry Building at 11973-11975 San Vicente Boulevard, Los Angeles, California, 90049.

☐ YES, I would like to learn more about the safe demolition of the Barry Building. Please add me to your mailing list and keep me informed.

NAME: Brian Jenson
ADDRESS: 11920 Montana Ave #5
LA CA 90049
CELL: 310-614-3184
EMAIL: BJJ@WLA@TWC.COM

QUESTIONS/COMMENTS:

I D like to see a new
Project go in there

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SC 9 - Russell

Reddot Realty

KEEP OUR NEIGHBORHOOD SAFE

☒ YES, I support the safe demolition of the Barry Building at 11973-11975 San Vicente Boulevard, Los Angeles, California, 90049.

☐ YES, I would like to learn more about the safe demolition of the Barry Building. Please add me to your mailing list and keep me informed.

NAME: Anne Russell
ADDRESS: 11940 San Vicente Blvd
Suite 100 90049
CELL: 310-697-9733
EMAIL: Anne.Russell@red.com

QUESTIONS/COMMENTS:

SC 10 - Jordan

KEEP OUR NEIGHBORHOOD SAFE

☒ YES, I support the safe demolition of the Barry Building at 11973-11975 San Vicente Boulevard, Los Angeles, California, 90049.

☐ YES, I would like to learn more about the safe demolition of the Barry Building. Please add me to your mailing list and keep me informed.

NAME: Ashley Jordan
ADDRESS: 11933 Gorkham Ave
apt 8 LA CA 90049
CELL: 310-715-9434
EMAIL: Ashlee.flower@cloud.com

QUESTIONS/COMMENTS:

Thank you

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SC 11 - Wright

KEEP OUR NEIGHBORHOOD SAFE

☒ YES, I support the safe demolition of the Barry Building at 11973-11975 San Vicente Boulevard, Los Angeles, California, 90049.

☒ YES, I would like to learn more about the safe demolition of the Barry Building. Please add me to your mailing list and keep me informed.

NAME: Mark Wright
ADDRESS: 11927 Gorkham Ave
Apt 301 LA CA 90049
CELL:
EMAIL: magnetictrumpets@gmail

QUESTIONS/COMMENTS:

Please demolish this building
It serves no purpose, is dangerous
and of value to the community.
- Also if they build something else
there needs to be proper
parking & turning lanes.

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SC 12 - Silver

KEEP OUR NEIGHBORHOOD SAFE

☒ YES, I support the safe demolition of the Barry Building at 11973-11975 San Vicente Boulevard, Los Angeles, California, 90049.

☐ YES, I would like to learn more about the safe demolition of the Barry Building. Please add me to your mailing list and keep me informed.

NAME: Lee Silver
ADDRESS: 416 Westgate
CELL:
EMAIL: LSilver@ucla.edu

QUESTIONS/COMMENTS:

Demolish because they
can't preserve
(lived here over 40 years)

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SC 13 - Moriarty

KEEP OUR NEIGHBORHOOD SAFE

☒ YES, I support the safe demolition of the Barry Building at 11973-11975 San Vicente Boulevard, Los Angeles, California, 90049.

☐ YES, I would like to learn more about the safe demolition of the Barry Building. Please add me to your mailing list and keep me informed.

NAME: Mark Moriarty
ADDRESS: 11973 Montana Ave #214
CELL: N/A
EMAIL: N/A

QUESTIONS/COMMENTS:

Building is not historic & lost use. Designation seems marginal. Property won't permit if retrofitted. Some use staircases & use them in new build.

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SC 14 - Tong

KEEP OUR NEIGHBORHOOD SAFE

☒ YES, I support the safe demolition of the Barry Building at 11973-11975 San Vicente Boulevard, Los Angeles, California, 90049.

☐ YES, I would like to learn more about the safe demolition of the Barry Building. Please add me to your mailing list and keep me informed.

NAME: Bill Tong
ADDRESS: 11970 Montana Ave
CELL: (818) 501-7373
EMAIL: cbartong@gmail.com

QUESTIONS/COMMENTS:

Egress - Demolish and Build.

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SC 15 - Winick

KEEP OUR NEIGHBORHOOD SAFE

☒ YES, I support the safe demolition of the Barry Building at 11973-11975 San Vicente Boulevard, Los Angeles, California, 90049.

☐ YES, I would like to learn more about the safe demolition of the Barry Building. Please add me to your mailing list and keep me informed.

NAME: Susan Winick
ADDRESS: 11902 Graham #5
CELL: 310 920 9745
EMAIL: susanwinick@icloud.com

QUESTIONS/COMMENTS:

It needs to come down if it is not retrofitted for safety reasons.

Scanned with CamScanner

SC 16 - Weitzen

KEEP OUR NEIGHBORHOOD SAFE

☒ YES, I support the safe demolition of the Barry Building at 11973-11975 San Vicente Boulevard, Los Angeles, California, 90049.

☐ YES, I would like to learn more about the safe demolition of the Barry Building. Please add me to your mailing list and keep me informed.

NAME: d weitzen
ADDRESS: 706 Wintgate
CELL: 818 663 4979
EMAIL:

QUESTIONS/COMMENTS:

Support for safety.

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SC 17 - Kruckenberg

KEEP OUR NEIGHBORHOOD SAFE

☒ YES, I support the safe demolition of the Barry Building at 11973-11975 San Vicente Boulevard, Los Angeles, California, 90049.

☐ YES, I would like to learn more about the safe demolition of the Barry Building. Please add me to your mailing list and keep me informed.

NAME: Deldre Kruckenberg
ADDRESS: 11927 Graham Ave #103
CELL: 650-689-7100
EMAIL: deekruckenberge@gmail.com

QUESTIONS/COMMENTS:

If unused/unsafe and can't be retrofitted then demo.

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SC 18 - Sandoghdar

KEEP OUR NEIGHBORHOOD SAFE

☒ YES, I support the safe demolition of the Barry Building at 11973-11975 San Vicente Boulevard, Los Angeles, California, 90049.

☐ YES, I would like to learn more about the safe demolition of the Barry Building. Please add me to your mailing list and keep me informed.

NAME: Hamed Sandoghdar
ADDRESS: 11976 Montana Ave #211 Los Angeles, CA 90049
CELL: 310 892 4341
EMAIL: Hamed269@yahoo.com

QUESTIONS/COMMENTS:

I think the building should be demolished.

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SC 19 - Berchik

KEEP OUR NEIGHBORHOOD SAFE

☒ YES, I support the safe demolition of the Barry Building at 11973-11975 San Vicente Boulevard, Los Angeles, California, 90049.

☐ YES, I would like to learn more about the safe demolition of the Barry Building. Please add me to your mailing list and keep me informed.

NAME: IRINA BERCHIK
ADDRESS: 11927 Gorham Ave
CELL:
EMAIL: berchik.ira@gmail.com

QUESTIONS/COMMENTS:
get rid of that thing

Scanned with CamScanner

SC 20 - Zim

KEEP OUR NEIGHBORHOOD SAFE

☒ YES, I support the safe demolition of the Barry Building at 11973-11975 San Vicente Boulevard, Los Angeles, California, 90049.

☐ YES, I would like to learn more about the safe demolition of the Barry Building. Please add me to your mailing list and keep me informed.

NAME: Irwin Zim
ADDRESS: 11911 Gorham Ave #1
CELL: N/A
EMAIL: N/A

QUESTIONS/COMMENTS:
knows all about issue - talked to me outside over his gate - feels if Munga not going to retrofit than demolish it already.

Scanned with CamScanner

SC 21 - Mitchell

KEEP OUR NEIGHBORHOOD SAFE

☒ YES, I support the safe demolition of the Barry Building at 11973-11975 San Vicente Boulevard, Los Angeles, California, 90049.

☐ YES, I would like to learn more about the safe demolition of the Barry Building. Please add me to your mailing list and keep me informed.

NAME: Jaren Mitchell
ADDRESS: 11908 San Vicente Blvd
Los Angeles, CA
CELL:
EMAIL: jarenm@alfred.la

QUESTIONS/COMMENTS:

SC 22 - Chapman

KEEP OUR NEIGHBORHOOD SAFE

☒ YES, I support the safe demolition of the Barry Building at 11973-11975 San Vicente Boulevard, Los Angeles, California, 90049.

☐ YES, I would like to learn more about the safe demolition of the Barry Building. Please add me to your mailing list and keep me informed.

NAME: Karen Chapman
ADDRESS: 11929 Saltair Terr
LA CA 90049
CELL:
EMAIL: Karenbenjaminvocal@gmail.com

QUESTIONS/COMMENTS:
Not worth the hassle. I'd like to see something better.

SC 23 - Papadopoulos

KEEP OUR NEIGHBORHOOD SAFE

☒ YES, I support the safe demolition of the Barry Building at 11973-11975 San Vicente Boulevard, Los Angeles, California, 90049.

☐ YES, I would like to learn more about the safe demolition of the Barry Building. Please add me to your mailing list and keep me informed.

NAME: Krissi Papadopoulos
ADDRESS: 11939 Gorham #103
CELL:
EMAIL:

QUESTIONS/COMMENTS:
Whatever brings the building safe or demolish

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SC 24 - Wood

KEEP OUR NEIGHBORHOOD SAFE

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☐ YES, I would like to learn more about the safe demolition of the Barry Building. Please add me to your mailing list and keep me informed.

NAME: Logan Wood
ADDRESS: 11927 Gorham Ave
Unit 102
CELL: 503-805-0816
EMAIL: lwood197@gmail.com

QUESTIONS/COMMENTS:
Time to go w/attachment

SC 25 - Rai

KEEP OUR NEIGHBORHOOD SAFE

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NAME: Manpreet Rai
ADDRESS: 11920 Montana Ave
Apt 202 LA CA
CELL: 959 722 7227
EMAIL: beautify@hotmail.com

QUESTIONS/COMMENTS:
no issues to building
being demolished

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SC 26 - Maradiaga

KEEP OUR NEIGHBORHOOD SAFE

☒ YES, I support the safe demolition of the Barry Building at 11973-11975 San Vicente Boulevard, Los Angeles, California, 90049.

☐ YES, I would like to learn more about the safe demolition of the Barry Building. Please add me to your mailing list and keep me informed.

NAME: MANUEL MARADIAGA
ADDRESS: 110907 CARMAN
AVE 90049
CELL: 310 299-0370
EMAIL: MARADIAGA.ME@GMAIL.COM

QUESTIONS/COMMENTS:
NO COMMENTS Not opposed
to demolition

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SC 27 - Mendoza

KEEP OUR NEIGHBORHOOD SAFE

☒ YES, I support the safe demolition of the Barry Building at 11973-11975 San Vicente Boulevard, Los Angeles, California, 90049.

☐ YES, I would like to learn more about the safe demolition of the Barry Building. Please add me to your mailing list and keep me informed.

NAME: Marc Mendoza
ADDRESS: 11911 SAN VICENTE
CELL:
EMAIL: MARC@MENDOZAFARMS.COM

QUESTIONS/COMMENTS:
Is the structure is unsafe it is a hazard
it needs to be removed

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SC 28 - Lewis

KEEP OUR NEIGHBORHOOD SAFE

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☐ YES, I would like to learn more about the safe demolition of the Barry Building. Please add me to your mailing list and keep me informed.

NAME: MICHAEL LEWIS
ADDRESS: 8337 S. WESTGATE
LA
CELL: 310-435-1260
EMAIL: MLEWIS67@YAHOO.COM

QUESTIONS/COMMENTS:

SC 29 - ODonnell

KEEP OUR NEIGHBORHOOD SAFE

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☐ YES, I would like to learn more about the safe demolition of the Barry Building. Please add me to your mailing list and keep me informed.

NAME: M. O'DONNELL
ADDRESS: 11920 MONTANA AV #1
LA
CELL: 650 207 3354
EMAIL: MOO@LIMANET.COM

QUESTIONS/COMMENTS:

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SC 30 - Lechasseur

KEEP OUR NEIGHBORHOOD SAFE

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☐ YES, I would like to learn more about the safe demolition of the Barry Building. Please add me to your mailing list and keep me informed.

NAME: MICHAEL LECHASSEUR
ADDRESS: 11920 MONTANA AVE
LA
CELL: 310
EMAIL: LECHASSEUR@GMAIL.COM

QUESTIONS/COMMENTS:

Yes demo already

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SC 31 - Younan

Vale Loure

KEEP OUR NEIGHBORHOOD SAFE

☒ YES, I support the safe demolition of the Barry Building at 11973-11975 San Vicente Boulevard, Los Angeles, California, 90049.

☐ YES, I would like to learn more about the safe demolition of the Barry Building. Please add me to your mailing list and keep me informed.

NAME: Nathan Younan

ADDRESS: 11958 San Vicente Blvd
Los Angeles, CA 90049

CELL: (760) 889-5002

EMAIL: Nathan.Younan@gmail.com

QUESTIONS/COMMENTS:

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SC 32 - Betziy

KEEP OUR NEIGHBORHOOD SAFE

☒ YES, I support the safe demolition of the Barry Building at 11973-11975 San Vicente Boulevard, Los Angeles, California, 90049.

☐ YES, I would like to learn more about the safe demolition of the Barry Building. Please add me to your mailing list and keep me informed.

NAME: Noel Betziy

ADDRESS: 11455 Gihena Apt 4
LA 90049

CELL: 310 774 1316

EMAIL:

QUESTIONS/COMMENTS:

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SC 33 - Couling

KEEP OUR NEIGHBORHOOD SAFE

☐ YES, I support the safe demolition of the Barry Building at 11973-11975 San Vicente Boulevard, Los Angeles, California, 90049.

☒ YES, I would like to learn more about the safe demolition of the Barry Building. Please add me to your mailing list and keep me informed.

NAME: PATRICIA COULING

ADDRESS: 1907 GOWAN AVE #11
LA, CA 90049

CELL:

EMAIL: PCOULING8ELL@gmail.com

QUESTIONS/COMMENTS:

I NEVER NOTICED THE BUILDING
BUT WOULD SUPPORT SAFE
DEMOLITION.

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Scanned with CamScanner

SC 34 - German

KEEP OUR NEIGHBORHOOD SAFE

☒ YES, I support the safe demolition of the Barry Building at 11973-11975 San Vicente Boulevard, Los Angeles, California, 90049.

☐ YES, I would like to learn more about the safe demolition of the Barry Building. Please add me to your mailing list and keep me informed.

NAME: PERRY M GERMAN

ADDRESS: 537 So. West Gate Ave
LA, CA 90049

CELL:

EMAIL:

QUESTIONS/COMMENTS:

Get rid of it.

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SC 35 - Alexander

Hlr Salen

KEEP OUR NEIGHBORHOOD SAFE

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☐ YES, I would like to learn more about the safe demolition of the Barry Building. Please add me to your mailing list and keep me informed.

NAME: Scott Alexander

ADDRESS: 11952 San Vicente Blvd

CELL:

EMAIL: SACD@AOL.COM

QUESTIONS/COMMENTS:

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SC 36 - Csoke

Azalia Salon owner

KEEP OUR NEIGHBORHOOD SAFE

☒ YES, I support the safe demolition of the Barry Building at 11973-11975 San Vicente Boulevard, Los Angeles, California, 90049.

☒ YES, I would like to learn more about the safe demolition of the Barry Building. Please add me to your mailing list and keep me informed.

NAME: Stefanie Csoke

ADDRESS: 11963 San Vicente Blvd
Los Angeles, CA 90049

CELL: 310-626-7761

EMAIL: stefaniecsoke@yahoo.com

QUESTIONS/COMMENTS:

Concerned about the dust and
debris that will come flying toward
my business next door. I am also
concerned about the traffic and parking
with the trucks and construction for
demolition and future development.

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SC 37 - Johnson

KEEP OUR NEIGHBORHOOD SAFE

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☐ YES, I would like to learn more about the safe demolition of the Barry Building. Please add me to your mailing list and keep me informed.

NAME: Shelia Johnson
 ADDRESS: 19161 North Ave
LA CA 90049
 CELL: 310-867-6586
 EMAIL: SS213@hotmail.com

QUESTIONS/COMMENTS:

Needs to be developed +
relat. cat. to relat. sh. M+
to put really in ownership

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SC 38 - Douglas

KEEP OUR NEIGHBORHOOD SAFE

☒ YES, I support the safe demolition of the Barry Building at 11973-11975 San Vicente Boulevard, Los Angeles, California, 90049.

☐ YES, I would like to learn more about the safe demolition of the Barry Building. Please add me to your mailing list and keep me informed.

NAME: Shelia Johnson
 ADDRESS: 443 La Brea
LA 90049
 CELL: 310-210-7682
 EMAIL: Shelia.douglas@gmail.com

QUESTIONS/COMMENTS:

I support the demo.
SE

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SC 39 - Burmaka

KEEP OUR NEIGHBORHOOD SAFE

☒ YES, I support the safe demolition of the Barry Building at 11973-11975 San Vicente Boulevard, Los Angeles, California, 90049.

☐ YES, I would like to learn more about the safe demolition of the Barry Building. Please add me to your mailing list and keep me informed.

NAME: Vsevolod Burmaka
 ADDRESS: 11937 Borham Ave. #6
Los Angeles CA 90049
 CELL: 240-981-1708
 EMAIL: vsevolod.burmaka@gmail.com

QUESTIONS/COMMENTS:

I have no connection to
the building.
Safety first

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