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February 11, 2026

## **VIA EMAIL AND ELECTRONIC UPLOAD**

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**Re: Objections to February 24, 2026, PLUM Committee Proceedings re: 11973-11975 W. San Vicente Blvd., Barry Building Project; Board File No. 250851; Council File No. 25-1518; Case Nos. ENV-2019-6645-EIR, ENV-2019-6645-EIR-1A; CHC-2007-1585-HCM**

Dear City Clerk, Board of Building and Safety Commissioners, Department of Building and Safety, and Department of City Planning:

This firm represents Angelenos for Historic Preservation (“AHP”) regarding the Barry Building Project at 11973-11975 W. San Vicente Boulevard (“Project”). AHP submits this letter to highlight further deficiencies in LADBS’s certification of an Environmental Impact Report (“EIR”) and adoption of a statement of overriding considerations and findings for the Project.

First, the EIR's alternatives analysis and the City's findings and statement of overriding consideration are predicated on the claim that the preservation of the Barry Building is economically infeasible. This claim cannot be independently analyzed or verified by the City or the public for the following reasons:

**Withholding of Building Drawings:** The architectural and structural drawings required to perform an accurate independent cost analysis for rehabilitation are in the exclusive possession and control of the Applicant. Without these, no outside engineer or preservation expert can provide a counter-pro forma or verify the applicant's rehabilitation cost estimates.

**Lack of Physical Access:** The property is currently fenced, locked, and inaccessible. This prevents independent experts from conducting the necessary site visits to verify the building's current state of blight or structural decay cited by the Applicant. Even without granting physical access to a licensed engineer on AHP's behalf, the City can, and should, require comprehensive photographic evidence to identify the affected structural elements and building areas.

**Withholding of HABS Documentation:** We know the on-site Historic American Buildings Survey (HABS) was performed on or about January 27, 2025, through February 7, 2025. Furthermore, we know a draft report was prepared by the Applicant's consultant, Historic Resources Group (HRG). By allowing HABS documentation to remain in draft form and out of the public record, the City is denying the public and Councilmembers information. Documentation must be a tool for informed decision-making, not a perfunctory "death certificate" issued after the decision to demolish has already been made.

**The Due Process/Fair Hearing Issue:** The public needs to be given a meaningful opportunity to be heard. By withholding the technical data (drawings) and physical access/documentation necessary to challenge the economic infeasibility claim, the City is allowing the Applicant to act as the sole source of evidence for their own benefit. A fair hearing is impossible if the evidence used to justify the destruction of a public cultural resource is hidden from public and independent scrutiny. The City's failure to provide the foundational evidence on which the Applicant's conclusions are based is a violation of due process and deprives AHP of a fair hearing.

**The CEQA Issue:** An EIR is intended to be an informational document through which the City discloses all that it reasonably can concerning a project. An EIR must include not just conclusions, but facts and analyses, and document the analytic route an agency travels from evidence to conclusions. The EIR fails as an informational document because it lacks adequate documentary evidence from the record to allow the public to meaningfully scrutinize and verify the City's conclusions.

City Clerk  
Board of Building and Safety Commissioners  
Department of Building and Safety  
Department of City Planning  
February 11, 2026

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We respectfully request that the PLUM Committee postpone any decision on this matter and instruct the Department of City Planning to:

- Compel the Applicant to release all existing building drawings and structural reports into the public record, and to provide comprehensive photographic and documentary evidence of all conditions in the Barry Building which the Applicant claims must be cured to reoccupy the building.
- Grant a site access window for Appellant's third-party preservation structural engineer and preservation architect to verify the Applicant's claims.
- Require the completion and public release of a HABS Level I or II report before the SOC is considered.

The Barry Building is a protected monument. Its demolition should not be sanctioned based on evidence that is shielded from the light of day. Please call me if you have any questions.

Thank you for your consideration of this matter.

Sincerely,



Jamie T. Hall

CC via email:

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