City of Los Angeles

REPORT ON APPEAL FROM DETERMINATION OF SUPERINTENDENT OF BUILDING

DATE:10/15/2025

PETITIONER:
Angelenos for Historic Preservation
c/o Susan Brandt-Hawley
P.O. Box 1659
Glen Ellen, CA 95442

OWNER:
11973 San Vicente, LLC
C/o Alston & Bird
Attn: Ed Casey
333 Hope Street, 16th Floor
Los Angeles, CA 90071

BOARD FILE: 250851
C.D.: 11 (Councilmember Traci Park)
PLANNING AREA: Brentwood – Pacific Palisades
ZONE: C4-1VL
BUREAU/DIV.: Permit and Engineering/Plan Check
DISTRICT OFFICE: Metro
PRIOR BOARD ACTION: No
ORDER: Yes

JOB ADDRESS: 11973-11975 West San Vicente Boulevard

EXHIBITS:

EXHIBIT A1 ZIMAS Parcel Profile Report

EXHIBIT B1 LADBS Letter of Determination with Attachments, dated June 6, 2025

EXHIBIT C1 DCP Letter to LADBS, dated March 21, 2024

EXHIBIT D1 LADBS Letter of Determination to CHC, dated May 9, 2024

EXHIBIT E1 CHC Recommendation, dated September 17, 2024

EXHIBIT F1 Public Correspondence, dated July 20, 2025

APPENDIX A Appeal package submitted by the Appellant

REQUEST:

The Appellant requests that the Board of Building and Safety Commissioners (BBSC) find that the Department of Building and Safety (LADBS) erred or abused its discretion and failed to proceed in the manner required by law in approving the demolition of the Barry Building located at 11973 – 11975 West San Vicente Boulevard, pursuant to Los Angeles Municipal Code Section 91.106.4.5.

THE POSITION OF THE DEPARTMENT WHEN AN APPEAL REGARDING ERROR OR ABUSE OF DISCRETION IS BROUGHT FORTH TO THE BOARD OF COMMISSIONERS, WILL ALWAYS UNEQUIVOCALLY BE THAT IT DID NOT COMMIT AN ERROR NOR ABUSED ITS DISCRETION IN THE ACTION APPEALED, OTHERWISE THAT ACTION WOULD HAVE BEEN CORRECTED AND THE APPEAL WITHDRAWN.

OVERVIEW:

The Project Site is located in the Brentwood Pacific Palisades Community Plan area of the City of Los Angeles (City) and is currently improved with a vacant commercial building identified by the City as Historic Cultural Monument (HCM) No. 887 (hereafter referred to as the Barry Building), and a surface parking lot, located at 11973 – 11975 West San Vicente Boulevard. The lot is zoned C4-1VL.

The subject of this appeal centers on LADBS' determination (Exhibit B) that the findings could be met to issue a demolition permit pursuant to LAMC 91.106.4.5 for the Barry Building, a designated HCM.

To comply with 91.106.4.5, an Environmental Impact Report (EIR) was required to be prepared.

To approve a project with an EIR, a decisionmaker needs to do the following:

1. **Certify the EIR.** Certify that the EIR was completed in compliance with the California Environmental Quality Act (CEQA), the EIR was presented to the decision-making body and the decision-making body reviewed and considered the information contained in the EIR prior to approving the project; and the final EIR reflects the lead agency's independent judgment and analysis;

2. **Adopt EIR Findings.** If the project will cause significant impacts that cannot be avoided by mitigation or alternatives adopt findings (EIR Findings), supported by substantial evidence, that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the EIR;

3. **Adopt a Statement of Overriding Considerations.** After consideration and balancing of the applicable economic, legal, social, technological, or other benefits of a proposed project

against its unavoidable significant impacts, adopt a written statement (Statement of Overriding Considerations (SOC)) supporting with substantial evidence the benefits of the project and specific reasons for supporting its action approving the project.

4. **Adopt mitigation measures and a mitigation monitoring program (MMP).**

On June 6, 2025, LADBS issued a letter of determination with approved findings that the EIR SOCs justifies the demolition of the historic Barry Building, and that a demolition permit may be issued based on specific economic, social, or other considerations that make preservation infeasible. The determination was subsequently appealed by Angelenos for Historic Preservation (Appellant). Specifically, the Appellant alleges that LADBS erred and abused its discretion by providing unclear appeal procedures; issuing a determination and a SOC based on findings that are not supported by substantial evidence; issuing a determination that is contrary to the Cultural Heritage Commission's recommendation and substantial evidence; and that the project is segmented in violation of CEQA.

When the certification of an EIR and adoption of EIR findings and an SOC are appealed, the appellate body is required to act in its independent judgement on the certification, EIR findings, and SOC. The appellate body may adopt the lower decision-maker's findings and SOC as their own but needs to adopt findings and the SOC in its own independent judgment and determine the findings and SOC are supported by substantial evidence. (CEQA Guidelines Section 15185(b))

HISTORY:

On November 18, 2020, the Department of City Planning (DCP) published an Initial Study/Notice of Preparation (IS/NOP) for the proposed demolition of the Barry Building (Project) with a 30-day comment period.

On February 16, 2023, DCP published a Draft Environmental Impact Report (DEIR) for the Project, with a 45-day comment period.

On March 29, 2023, DCP extended the DEIR comment period to a total of 60 days.

On September 11, 2023, DCP published a Final EIR (FEIR) for the Project, which included responses to all comments provided by members of the public and agencies.

On March 21, 2024, DCP provided LADBS written recommendations on the adoption and certification of the EIR, as the EIR was prepared in accordance with CEQA. DCP also outlined the appropriate findings and process for LADBS. to either approve or deny issuance of a demolition permit based on the Project EIR. This written correspondence is included as Exhibit C.

On May 9, 2024, LADBS requested the Cultural Heritage Commission (CHC) to provide a recommendation on the certification of the EIR and adoption of the CEQA Findings and SOCs. This written correspondence is included as Exhibit D.

On September 5, 2024, the CHC held a hearing and considered the EIR and CEQA Findings and OHR Staff Recommendation Report, and recommended that LADBS certify the EIR and that LADBS not adopt a Statement of Overriding Considerations.

On September 17, 2024, CHC issued a written letter reflecting their decision made at made its September 5, 2024 meeting (CHC Recommendation). The CHC Recommendation was based on the Staff Recommendation Report prepared by OHR Staff and attached to the CHC correspondence. The letter and its attachments are included as Exhibit E.

On June 6, 2025, LADBS issued a determination (LADBS Determination) certifying the Project EIR pursuant to CEQA Guidelines Section 15090; adopting a Mitigation Monitoring Program (MMP), CEQA Findings, Statement of Overriding Consideration for the Project; and a finding under LAMC Section 91.106.4.5, that based upon the whole of the record, including the CEQA Findings (labeled EIR Findings) and the SOC, a demolition permit may be issued because specific economic, social, or other considerations make infeasible the preservation of the Barry Building. This determination is included as Exhibit B.

On July 8, 2025, a timely appeal was filed by Brandt-Hawley Law Group on behalf of the Angelenos for Historic Preservation, challenging the LADBS Determination. The appeal is included in Appendix A of this report.

DISCUSSION:

Below are the specific issues identified in the appeal (Appendix A), followed by LADBS' corresponding responses.

Issue No. 1:

The City's appeal procedures are unclear and LADBS lacks authority to approve CEQA documents.

LADBS Response to Issue No. 1:

The Appellant asserts that the appeal procedures are unclear as the appeal encompasses both the Los Angeles Building Code (LABC) and CEQA. However, the Appellant was able to file a timely appeal which was accepted and is now before this Board for consideration. As such, the Appellant was able to exercise their appeal rights.

The Appellant also alleges that, based on a decision in *Citizens for the Restoration of L Street v. City of Fresno (2014)*, LADBS lacks authority to approve CEQA documents, and the LAMC does not provide this authority. LADBS is the identified decision-maker for the required finding in LAMC Section 91.106.4.5 before any demolition permit can be issued on an HCM. Once that decision is made, issuance of a demolition permit is a ministerial approval, provided all processes are followed, including a referral to the City's Cultural Heritage Commission (CHC) pursuant to Los Angeles Administrative Code Section 22.171.15. As such, LADBS is responsible for certifying the EIR, and adopting the EIR findings and SOCs before the decision in LAMC Section 91.106.4.5 can be made.

Issue No. 2:

The Appellant asserts that the CHC's recommendation that the Department not adopt the SOCs is supported by substantial evidence, while the Department's findings, SOCs, and projects approvals *were not* based on substantial evidence.

LADBS Response to Issue No. 2:

The Appellant provides a transcript of the CHC meeting in support of this contention, but does not provide any detail regarding specific deficiencies in the CEQA Findings or SOCs, or any expert studies contradicting those in the LADBS Determination.

CEQA Guidelines Section 15384 clearly outlines what constitutes substantial evidence:

> "a) "Substantial evidence" as used in these guidelines means enough relevant information and reasonable inferences from this information that a fair argument can be made to support a conclusion, even though other conclusions might also be reached. Whether a fair argument can be made that the project may have a significant effect on the environment is to be determined by examining the whole record before the lead agency. Argument, speculation, unsubstantiated opinion or narrative, evidence which is clearly erroneous or inaccurate, or evidence of social or economic impacts which do not contribute to or are not caused by physical impacts on the environment does not constitute substantial evidence.
>
> (b) Substantial evidence shall include facts, reasonable assumptions predicated upon facts, and expert opinion supported by facts."

The EIR provides substantial evidence in the form of expert studies, quantitative evidence, and technical appendices to the EIR. Additionally, the Applicant provided supplemental technical reports to further support the SOCs.

While the Staff Recommendation Report prepared for the CHC by the Office of Historic Resources (OHR) provided counterarguments to the technical reports prepared by experts for the EIR, no specific deficiencies in these expert technical reports were identified in the written and oral testimony.

Issue No. 3:

The Appellant alleges that project does not meet CEQA substantial evidence requirements, nor does it comply with LAMC Section 91.106.4.5. Therefore, the demolition permit should be voided because the EIR is inadequate and should not be certified, the SOCs are not supported by substantial evidence, and LADBS' actions should be set aside.

LADBS Response to Issue No. 3:

The Appellant selectively cites Public Resource Code (PRC) Sections 21002 and 21081, but does not specifically identify how they relate to their assertion that the LADBS Determination or EIR are deficient or fail to meet these requirements.

PRC Section 21002, as quoted by the Appellant, states that CEQA requires "public agencies should not approve projects as proposed if there are feasible alternatives … that would substantially lessen their significant environmental effects." However, PRC Section 21002 in full states (*emphasis added*):

> "The Legislature finds and declares that it is the policy of the state that public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects, and that the procedures required by this division are intended to assist public agencies in systematically identifying both the significant effects of proposed projects and the feasible alternatives or feasible mitigation measures which will avoid or substantially lessen such significant effects. *The Legislature further finds and declares that in the event specific economic, social, or other conditions make infeasible such project alternatives or such mitigation measures, individual projects may be approved in spite of one or more significant effects thereof.*"

Further context is provided in PRC Section 21002.1, which provides for public agencies to exercise discretion in approving projects with impacts (*emphasis added*):

> "(b) Each public agency shall mitigate or avoid the significant effects on the environment of projects that it carries out or approves whenever it is feasible to do so.
> (c) If economic, social, or other conditions make it infeasible to mitigate one or more significant effects on the environment of a project, the project *may nonetheless be carried out or approved at the discretion of a public agency* if the project is otherwise permissible under applicable laws and regulations."

PRC Section 21081 further states (*emphasis added*):

> "Pursuant to the policy stated in Sections 21002 and 21002.1, no public agency shall approve or carry out a project for which … identifies one or more significant effects on the environment that would occur if the project is approved or carried out *unless both of the following occur [...]"*

The Section continues to list the two conditions, which include 1) the required findings that must be made in the event significant impacts are identified, and 2) adoption of a statement of overriding considerations. The Project's adopted CEQA Findings discussed this framework and properly made the respective Findings and SOCs, both supported by substantial evidence in reports prepared by technical experts (see Exhibit A of the LADBS Determination).

Based on the above, CEQA makes clear that local agencies considering projects with substantial impacts have the discretion to approve projects if the lead agency makes required findings and adopts an SOC, provided both are supported by substantial evidence. The Appellant provides no substantial evidence to refute any of the findings made pursuant to PRC Sections 21002, 21002.1, and 21081.

Issue No. 4:

The Appellant alleges that it is reasonably foreseeable that because the Applicant owns the Barry Building property, and adjacent lots that have been cleared in recent years, there is an intent to either to develop them or sell them to an entity who will; and that the EIR is inadequate for its failure to analyze the potential for development as part of the project description.

LADBS Response to Issue No. 4:

The Appellant suggests that the Project is improperly segmented or "piecemealed" by not disclosing impacts related to a future development onsite. Piecemealing is when a project is split into smaller parts to avoid disclosing a project's potential impacts, and piecemealing is prohibited by CEQA. Similar public comments submitted by unrelated parties were addressed in the Responses to Comments included in the City's Final EIR. As previously noted in the Final EIR, there is no evidence in the record of piecemealing or that there is a proposed development project for the site. In fact, as part of the application for a demolition permit, the Applicant has stated under penalty of perjury that the demolition of the Barry Building is not part of a larger or new development project.

Further, by virtue of the nature of impacts to historic resources, impacts to an individually eligible resource cannot be piecemealed if the resource is demolished, as no further impacts to the resource, as disclosed in the EIR, could occur after demolition. Any new impacts that could not be mitigated would similarly require the City to make Findings and adopt a SOC. Moreover, if the City later determined the Applicant intentionally piecemealed the project, the City could, through an administrative process, issue penalties that may include fines and potentially withholding of permits for up to 5 years, and could potentially require any CEQA analysis on a new project to include a pre-demolition baseline that included the historical resource. (LAMC Chapter 1A, Section 13B.11.1.I.)

Issue No. 5:

The Appellant alleges that there is lack of evidence to support the SOCs.

LADBS Response to Issue No. 5:

The Appellant asserts that the EIR is inadequate for failing to analyze potentially feasible mitigation or alternatives related to the adaptive reuse the Barry Building to reduce significant impacts, but does not provide any substantial evidence or specifics to support this claim.

The DEIR included a mitigation measure for documentation of the historic resource and also analyzed four alternatives to the demolition of the Barry Building, which included:

1) No Project Alternative. No demolition would occur, and the building would be retrofitted for compliance with the City's Soft Story Retrofit Program, although it would remain unoccupiable.
2) Preservation Alternative. No demolition would occur, and voluntary seismic retrofit and ADA, building code, and energy efficiency upgrades of the existing building would occur,

after which the building would be re-occupied by approximately 12,800 square feet of retail uses.

3) Partial Preservation with New Construction Alternative. Similar to the Preservation Alternative, but would also include the construction of a new building behind (north of) the existing building.
4) Relocation Alternative. This involves the dismantling of the Barry Building into multiple small building portions to facilitate its relocation to a new site.

A number of studies were submitted to the City, substantiating the economic infeasibility of the various options for preservation of the building and for compliance with the Soft Story Retrofit Program. Studies submitted by structural and economic experts established the cost and feasibility of the alternatives. In addition, economic market studies indicating the economic feasibility of each of these scenarios were submitted. Economic studies submitted further concluded that even under the most economically advantageous scenario of minimal necessary improvements, retention and reuse of the Barry Building was determined to be economically infeasible.

Appendices H-1 through H-16 of the DEIR included expert reports regarding the technical feasibility of preservation of the Barry Building, including some adaptive reuse scenarios. Supplemental information provided by the Applicant in their communication to the Planning Department dated July 15, 2024, contained reports updated for current economic conditions including: Barry Building Renovations by Hill International, November 2022, Barry Building Land Residual Analysis by CBRE Brokerage, March 2023 (Pro forma), Revised Cost Estimate, Hill International, June 27, 2024, Revised Revenue Analysis, CBRE Valuation, July 2024.

Therefore, the whole of the record reflects that the EIR adequately analyzed potentially feasible mitigation and alternatives, and supplemental studies included discussions of the feasibility of various retention and reuse situations. The CEQA Findings, which included the SOCs, were based on substantial evidence in the record.

Issue No. 6:

The Appellant requests that the recommendations of OHR Staff and CHC to not adopt the SOCs be followed, and that there is no substantial evidence to support contrary actions.

LADBS Response to Issue No. 6:

While OHR and CHC recommended that LADBS not adopt the SOCs, the Appellant provides no substantial evidence of deficiencies to support claims that the EIR is deficient, that the EIR was prepared incorrectly, that the evidence submitted regarding the feasibility studies is inaccurate, or that LADBS erred in its discretion. As discussed in LADBS Response to Issue No. 3, the Appellant provides no substantial evidence to refute any of the findings made pursuant to PRC Sections 21002, 21002.1, and 21081, which were supported by substantial evidence in reports prepared by technical experts (see Exhibit A of the LADBS Determination, attached herein as Exhibit B). Otherwise, the decision to adopt a SOC is a policy decision of the decision-maker that the benefit of the project outweighs the environmental impact. In this case, the benefit is identified as the removal of an attractive nuisance, which is not compliant with Soft Story Retrofit requirements constituting a safety hazard. The demolition will also result in jobs and economic activity, supporting the City's economic goals, as outlined in the Applicant's communication to the

Planning Department dated July 15, 2024. The removal would result in an additional vacant site that could accommodate housing or other commercially viable development in the future, built to more energy-efficient and structurally safer modern building codes, contributing to the City's Regional Housing Needs Assessment (RHNA) allocations and the City's critical housing need, or providing new commercial uses in line with smart growth policies and transit-oriented development.. The unavoidable environmental impact is the loss of a historical resource. The policy decision to adopt the SOCs was based on these considerations and on substantial evidence in the record.

ADDITIONAL CORRESPONDENCE:

On July 20, 2025, additional comments were submitted by Robert Blue and Sieglinde Kruse Blue (Commenters) in support of the July 8, 2025 Appeal and objections to the actions taken by LADBS regarding the determination for the above-referenced Project. Below are the specific issues identified in the Additional Correspondence (Appendix G), followed by LADBS' corresponding responses.

Supplemental Issue No. 1:

LADBS is not qualified to perform CEQA-related actions.

LADBS Response to Supplemental Issue No. 1:

The Commenters argue that LADBS does not have any experience in certifying an EIR and adopting an SOC, nor have they ever processed an EIR of the demolition of an HCM without a replacement project; and if approved, this would establish a precedent that would threaten all HCMs.

While this type of permit is the first of its kind, LADBS is the identified decision-maker for the required finding in LAMC Section 91.106.4.5 before any demolition permit can issue on an HCM. As such, they are responsible for certifying the EIR, and adopting the EIR findings and SOCs before the decision in LAMC Section 91.106.4.5 can be made. Similarly, other City decision-makers such as the City Council or various Commissions, do not directly prepare CEQA documents. The EIR was prepared by a professional environmental consultant (CAJA Environmental Services, LLC) under the supervision and review of Department of City Planning staff with specific expertise in CEQA, and in coordination with LADBS. In addition, the LADBS decision on the matter is independent of considerations of the demolition of any other future HCMs within the City, and does not prejudice those decisions.

Supplemental Issue No. 2a:

The appeal process impedes public participation and the public's rights.

LADBS Response to Supplemental Issue No. 2a:

The Commenters argue that the appeal process set forth in the LOD restricts public participation, and that the LADBS form acted as an impediment to the public's rights to petition their government through the appeal process. Additionally, the Commenters assert that the forms were confusing as

the form attached to the LOD is not applicable to appealing CEQA-related actions, and that LADBS should have used an existing City of Los Angeles form for appealing non-Planning Department CEQA-related decisions. Contrary to the Commenter's suggestions, that suggested form is not applicable here as this is not an appeal to the City Council pursuant to LAMC 197.01, et seq. There will be a subsequent opportunity for appeal available pursuant to LAMC Chapter 1A, Section 13B.11.1.F, if the Board upholds the LADBS action. That appeal process applies to permits issued by LADBS pursuant to Section 13B.11.1.A. LADBS staff was available to answer questions and assist the public in submitting appeals, and a timely appeal of the determination was filed.

Supplemental Issue No. 2b:

The Commenters argue that the LADBS Board Secretary restricted written comments from the public by stating that objections after an appeal is filed would not be accepted; and that nothing in the LOD explains how additional comments/information may be submitted by an appellant in a CEQA-related case and/or how it would affect the time limit if submitted after the deadline.

LADBS Response to Supplemental Issue No. 2b:

Veronica Lopez clarified in an email dated July 14, 2025 to the Commenters that once the Board fees have been paid, additional information will not be accepted by the Appellant; however, public comment or written communication to the Boards is permitted and that instructions would be provided on the hearing notice.

Supplemental Issue No. 2c:

The Commenters argue that Councilmember Traci Park had already made a decision to support the demolition of the Barry Building prior to the September 5, 2024 CHC meeting and, in doing so, made statements which could be perceived as an attempt to influence the CHC; and should, therefore, recuse herself from the Project should it go before the City Council on a CEQA Appeal.

LADBS Response to Supplemental Issue No. 2c:

The Council District bears no weight on LADBS' decision to issue the demolition permit, or whether they erred or abused their discretion in doing so. As provided in the LADBS Determination, the decision to proceed is based LAMC Section 91.106.4.5, which requires findings pursuant to CEQA be made. As discussed above and in Exhibit B, the findings have been made in the independent judgement of the decision maker and based on the whole of the administrative record. For any action taken by the Board on the appeal, the Board will also need to act independently.

CONCLUSION:

LADBS properly complied with all department regulations, policies, and requirements of the LABC, and as a result, **did not err or abuse** its discretion in issuing a determination related to demolition permits, certifying the Project EIR, adopting an MMP, Findings, SOCs for the Project, and a finding that based upon the whole of the record, including the EIR Findings and the SOCs,

a demolition permit may be issued because specific economic, social, or other considerations make infeasible the preservation of the building at 11973 West San Vicente Boulevard.

To comply with CEQA, the Board needs to exercise its independent judgment to determine whether they should take each of the following actions:

1. Certify the EIR,
2. Adopt the EIR Findings,
3. Adopt the SOC; and
4. Find that, pursuant to Section 91.106.4.5, the demolition permit may be issued.

OSAMA YOUNAN
General Manager
Superintendent of Building

Faruk Sezer
_____
Faruk Sezer
Building Civil Engineer II, Government and Community Relations

Devin Myrick
_____
Devin Myrick
Assistant Deputy Superintendent of Building, Government and Community Relations

EXHIBIT A1

City of Los Angeles
Department of City Planning

9/2/2025
PARCEL PROFILE REPORT

PROPERTY ADDRESSES
11973 W SAN VICENTE BLVD
11975 W SAN VICENTE BLVD

ZIP CODES
90049

RECENT ACTIVITY
None

CASE NUMBERS
CPC-2014-1457-SP
CPC-2009-1064-GPA-VZC-HD-SP-CUB-ZV-SPR
CPC-2005-8252-CA
CPC-1994-308-DRB
CPC-1993-359-DRB
CPC-1981-29649
CPC-1979-28385
CPC-1974-25504
CPC-1973-24818
CPC-1973-24817
ORD-186108
ORD-173381
ORD-171492
ORD-171227
ORD-163205
ORD-161766
ORD-157559-SA14A
ORD-153639
ORD-147445
ORD-146541
ORD-129279
DIR-2009-1066-DRB-SPP
ZA-2010-160-CUB
ZA-2010-159-CUB
ZA-2010-158-CUB
CHC-2007-1585-HCM
ENV-2019-6645-EIR
ENV-2014-1458-EIR-SE-CE
ENV-2009-1065-EIR
ENV-2005-8253-ND
ND-79-480-SP
ED-74-631-SUD-O
ED-74-2641-03-143-ZC
PRIOR-07/29/1962

Address/Legal Information	
PIN Number	129B145 87
Lot/Parcel Area (Calculated)	16,592.8 (sq ft)
Thomas Brothers Grid	PAGE 631 - GRID G4
Assessor Parcel No. (APN)	4404025008
Tract	WESTGATE ACRES
Map Reference	M B 7-90/91
Block	None
Lot	51
Arb (Lot Cut Reference)	1
Map Sheet	129B141
	129B145
Jurisdictional Information	
Community Plan Area	Brentwood - Pacific Palisades
Area Planning Commission	West Los Angeles APC
Neighborhood Council	None
Council District	CD 11 - Traci Park
Census Tract #	2640.00000000
LADBS District Office	West Los Angeles
Permitting and Zoning Compliance Information	
Administrative Review	None
Planning and Zoning Information	
Special Notes	None
Zoning	C4-1VL
Zoning Information (ZI)	ZI-1096 Specific Plan: San Vicente Scenic Corridor
	ZI-2517 Al Fresco Ordinance within Planning Overlay and/or the Coastal Zone (Ordinance 188073)
	ZI-2512 Housing Element Sites
	ZI-2498 Local Emergency Temporary Regulations - Time Limits and Parking Relief - LAMC 16.02.1
	ZI-2192 Specific Plan: West Los Angeles Transportation Improvement and Mitigation
General Plan Land Use	Neighborhood Office Commercial
General Plan Note(s)	Yes
Minimum Density Requirement	No
Hillside Area (Zoning Code)	No
Specific Plan Area	SAN VICENTE SCENIC CORRIDOR
Subarea	None
Specific Plan Area	WEST LOS ANGELES TRANSPORTATION IMPROVEMENT AND MITIGATION
Subarea	None
Special Land Use / Zoning	None
Historic Preservation Review	Yes
HistoricPlacesLA	Yes
Historic Preservation Overlay Zone	None
Other Historic Designations	Yes
Mills Act Contract	None
CDO: Community Design Overlay	None
CPIO: Community Plan Imp. Overlay	None

This report is subject to the terms and conditions as set forth on the website. For more details, please refer to the terms and conditions at zimas.lacity.org
(*) - APN Area is provided "as is" from the Los Angeles County's Public Works, Flood Control, Benefit Assessment.

Subarea	None
CPIO Historic Preservation Review	No
CUGU: Clean Up-Green Up	None
HCR: Hillside Construction Regulation	No
NSO: Neighborhood Stabilization Overlay	No
POD: Pedestrian Oriented Districts	None
RBP: Restaurant Beverage Program Eligible Area	General (RBPA)
ASP: Alcohol Sales Program	No
RFA: Residential Floor Area District	None
RIO: River Implementation Overlay	No
SN: Sign District	No
AB 2334: Low Vehicle Travel Area	Yes
AB 2097: Within a half mile of a Major Transit Stop	No
Streetscape	No
Adaptive Reuse Incentive Area	None
Affordable Housing Linkage Fee	
Residential Market Area	High
Non-Residential Market Area	High
Inclusionary Housing	No
Local Affordable Housing Incentive	No
Targeted Planting	No
Special Lot Line	No
Transit Oriented Communities (TOC)	Not Eligible
Mixed Income Incentive Programs	
Transit Oriented Incentive Area (TOIA)	Not Eligible
Opportunity Corridors Incentive Area	Not Eligible
Corridor Transition Incentive Area	Not Eligible
TCAC Opportunity Area	Highest
High Quality Transit Corridor (within 1/2 mile)	Yes
ED 1 Eligibility	Not Eligible
RPA: Redevelopment Project Area	None
Central City Parking	No
Downtown Parking	No
Building Line	None
500 Ft School Zone	None
500 Ft Park Zone	None
Zanja System 1 Mile Buffer	No
Assessor Information	
Assessor Parcel No. (APN)	4404025008
Ownership (Assessor)	
Owner1	11973 SAN VICENTE LLC c/o C/O CHARLES T MUNGER
Address	0 PO BOX 55007 LOS ANGELES CA 90055
Ownership (Bureau of Engineering, Land Records)	
Owner	11973 SAN VICENTE LLC
Address	Not Available
Owner	THE NBACTMC II PARTNERSHIP C/O CHARLES T. MUNGER
Address	P. O. BOX 55007 LOS ANGELES CA 90055
APN Area (Co. Public Works)*	0.615 (ac)
Use Code	1200 - Commercial - Store Combination - Store and Office Combination - One Story
Assessed Land Val.	$4,311,024
Assessed Improvement Val.	$784,074

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(*) - APN Area is provided "as is" from the Los Angeles County's Public Works, Flood Control, Benefit Assessment.

Last Owner Change	04/27/2017
Last Sale Amount	$1
Tax Rate Area	67
Deed Ref No. (City Clerk)	908409-10
	8-717
	783
	60465-8
	542902
	467331
	2779133
	180137
	1597224,6
	1557569-70
	111397
Building 1	
Year Built	1951
Building Class	D65B
Number of Units	32
Number of Bedrooms	0
Number of Bathrooms	2
Building Square Footage	13,301.0 (sq ft)
Building 2	
Year Built	1951
Building Class	DX
Number of Units	1
Number of Bedrooms	0
Number of Bathrooms	0
Building Square Footage	10,680.0 (sq ft)
Building 3	No data for building 3
Building 4	No data for building 4
Building 5	No data for building 5
Rent Stabilization Ordinance (RSO)	No [APN: 4404025008]
Additional Information	
Airport Hazard	None
Coastal Zone	None
Coastal Bluff Potential	No
Canyon Bluff Potential	No
Farmland	Area Not Mapped
Urban Agriculture Incentive Zone	YES
Very High Fire Hazard Severity Zone	No
Fire District No. 1	No
Flood Zone	500 Yr
Watercourse	Yes
Methane Hazard Site	None
High Wind Velocity Areas	No
Special Grading Area (BOE Basic Grid Map A-13372)	Yes
Wells	None
Sea Level Rise Area	No
Oil Well Adjacency	No
Environmental	
Santa Monica Mountains Zone	No
Biological Resource Potential	Low
Mountain Lion Potential	Low
Monarch Butterfly Potential	No

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300-Foot Habitat Buffer	Yes
County-Designated SEAs and CRAs	No
USFWS-designated CHAs	No
Wildland Urban Interface (WUI)	No
Criterion 1 Protected Areas for Wildlife (PAWs)	No
Seismic Hazards	
Active Fault Near-Source Zone	
Nearest Fault (Distance in km)	Within Fault Zone
Nearest Fault (Name)	Santa Monica Fault
Region	Transverse Ranges and Los Angeles Basin
Fault Type	B
Slip Rate (mm/year)	1.00000000
Slip Geometry	Left Lateral - Reverse - Oblique
Slip Type	Moderately / Poorly Constrained
Down Dip Width (km)	13.00000000
Rupture Top	0.00000000
Rupture Bottom	13.00000000
Dip Angle (degrees)	-75.00000000
Maximum Magnitude	6.60000000
Alquist-Priolo Fault Zone	No
Landslide	No
Liquefaction	No
Preliminary Fault Rupture Study Area	None
Tsunami Hazard Area	No
Economic Development Areas	
Business Improvement District	None
Hubzone	None
Jobs and Economic Development Incentive Zone (JEDI)	None
Opportunity Zone	No
Promise Zone	None
State Enterprise Zone	None
Housing	
Rent Stabilization Ordinance (RSO)	No [APN: 4404025008]
Ellis Act Property	No
Just Cause For Eviction Ordinance (JCO)	No
Housing Crisis Act Replacement Review	Yes
Housing Element Sites	
HE Replacement Required	N/A
SB 166 Units	N/A
Housing Use within Prior 5 Years	Yes
Public Safety	
Police Information	
Bureau	West
Division / Station	West Los Angeles
Reporting District	826
Fire Information	
Bureau	West
Battallion	9
District / Fire Station	19
Red Flag Restricted Parking	No

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CASE SUMMARIES

Note: Information for case summaries is retrieved from the Planning Department's Plan Case Tracking System (PCTS) database.

Case Number:	CPC-2014-1457-SP
Required Action(s):	SP-SPECIFIC PLAN (INCLUDING AMENDMENTS)
Project Description(s):	SPECIFIC PLAN AMENDMENT
Case Number:	CPC-2009-1064-GPA-VZC-HD-SP-CUB-ZV-SPR
Required Action(s):	GPA-GENERAL PLAN AMENDMENT
	VZC-VESTING ZONE CHANGE
	HD-HEIGHT DISTRICT
	SP-SPECIFIC PLAN (INCLUDING AMENDMENTS)
	CUB-CONDITIONAL USE BEVERAGE-ALCOHOL
	ZV-ZONE VARIANCE
	SPR-SITE PLAN REVIEW
Project Description(s):	GENERAL PLAN AMENDMENT FROM LOW DENSITY RESIDENTIAL TO NEIGHBORHOOD COMMERCIAL. ZONE AND HEIGHT DISTRICT CHANGE FROM RS-1 AND (Q)C4-1VL TO (Q)C4-1VL. A CONDITIONAL USE FOR ON SITE AND OFF SITE SALE OF ALCHOLIC BEVERAGES IN RESTURANTS. SEPARATE DESIGN REVIEW AND PROJECT PERMIT IS BEING REQUESTED. THE PROJECT WILL CONSIST OF A TWO SOTRY 40,139 SF COMMERCIAL CENTER CONSISTING OF RETAIL AND RESTAURANT SPACES WITH 351 PARKING SPACES.
Case Number:	CPC-2005-8252-CA
Required Action(s):	CA-CODE AMENDMENT
Project Description(s):	AN ORDINANCE ESTABLISHING PERMANENT REGULATIONS IMPLEMENTING THE MELLO ACT IN THE COASTAL ZONE.
Case Number:	CPC-1994-308-DRB
Required Action(s):	DRB-DESIGN REVIEW BOARD
Project Description(s):	DESIGN REVIEW BOARD REQUEST TO INSTALL A NEW SIGN.
Case Number:	CPC-1993-359-DRB
Required Action(s):	DRB-DESIGN REVIEW BOARD
Project Description(s):	ADD RECIVING - STORAGE AREA TO DUTTON'S BOOKS
Case Number:	CPC-1981-29649
Required Action(s):	Data Not Available
Project Description(s):	
Case Number:	CPC-1979-28385
Required Action(s):	Data Not Available
Project Description(s):	ESTABLISHING A SCENIC CORRIDOR SPECIFIC PLAN FOR BOTH SIDES OFSAN VICENTE BOULEVARD BETWEEN GOSHEN AVENUE AND 26TH STRET (LOS ANGELES/SANTA MONICA CITY BOUNDARY LINES) TO A MAXIMUM DEPTH OF APPROXIMATELY 150 FEET
Case Number:	CPC-1974-25504
Required Action(s):	Data Not Available
Project Description(s):	
Case Number:	CPC-1973-24818
Required Action(s):	Data Not Available
Project Description(s):	
Case Number:	CPC-1973-24817
Required Action(s):	Data Not Available
Project Description(s):	
Case Number:	DIR-2009-1066-DRB-SPP
Required Action(s):	DRB-DESIGN REVIEW BOARD
	SPP-SPECIFIC PLAN PROJECT PERMIT COMPLIANCE
Project Description(s):	Data Not Available
Case Number:	ZA-2010-160-CUB
Required Action(s):	CUB-CONDITIONAL USE BEVERAGE-ALCOHOL
Project Description(s):	CONDITIONAL USE FOR THE ON SITE CONSUMPTION OF FULL LINE OF ALCHOLIC BEVERAGES AS PART OF A PROPOSED 73,000 SF RETAIL, OFFICE AND RESTAURANT COMPLEX. REQUEST OS PART OF CPC-2009-1064 GPZ-VZC. ONE OF THREE RESTAURANTS PROPOSED
Case Number:	ZA-2010-159-CUB
Required Action(s):	CUB-CONDITIONAL USE BEVERAGE-ALCOHOL
Project Description(s):	CONDITIONAL USE FOR THE ON SITE CONSUMPTION OF FULL LINE OF ALCHOLIC BEVERAGES AS PART OF A PROPOSED 73,000 SF RETAIL, OFFICE AND RESTAURANT COMPLEX. REQUEST OS PART OF CPC-2009-1064 GPZ-VZC. ONE OF THREE RESTAURANTS PROPOSED

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Case Number:	ZA-2010-158-CUB
Required Action(s):	CUB-CONDITIONAL USE BEVERAGE-ALCOHOL
Project Description(s):	CONDITIONAL USE FOR THE ON SITE CONSUMPTION OF FULL LINE OF ALCHOLIC BEVERAGES AS PART OF A PROPOSED 73,000 SF RETAIL, OFFICE AND RESTAURANT COMPLEX. REQUEST OS PART OF CPC-2009-1064 GPZ-VZC. ONE OF THREE RESTAURANTS PROPOSED
Case Number:	CHC-2007-1585-HCM
Required Action(s):	HCM-HISTORIC CULTURAL MONUMENT
Project Description(s):	DESIGNATION AS A HISTORIC-CULTURAL MONUMENT.
Case Number:	ENV-2019-6645-EIR
Required Action(s):	EIR-ENVIRONMENTAL IMPACT REPORT
Project Description(s):	FOCUSED EIR FOR DEMOLITION OF A HISTORICAL MONUMENT.
Case Number:	ENV-2014-1458-EIR-SE-CE
Required Action(s):	EIR-ENVIRONMENTAL IMPACT REPORT SE-STATUTORY EXEMPTIONS CE-CATEGORICAL EXEMPTION
Project Description(s):	ENVIRONMENTAL IMPACT REPORT
Case Number:	ENV-2009-1065-EIR
Required Action(s):	EIR-ENVIRONMENTAL IMPACT REPORT
Project Description(s):	GENERAL PLAN AMENDMENT FROM LOW DENSITY RESIDENTIAL TO NEIGHBORHOOD COMMERCIAL. ZONE AND HEIGHT DISTRICT CHANGE FROM RS-1 AND (Q)C4-1VL TO (Q)C4-1VL. A CONDITIONAL USE FOR ON SITE AND OFF SITE SALE OF ALCHOLIC BEVERAGES IN RESTURANTS. SEPARATE DESIGN REVIEW AND PROJECT PERMIT IS BEING REQUESTED. THE PROJECT WILL CONSIST OF A TWO SOTRY 40,139 SF COMMERCIAL CENTER CONSISTING OF RETAIL AND RESTAURANT SPACES WITH 351 PARKING SPACES.
Case Number:	ENV-2005-8253-ND
Required Action(s):	ND-NEGATIVE DECLARATION
Project Description(s):	AN ORDINANCE ESTABLISHING PERMANENT REGULATIONS IMPLEMENTING THE MELLO ACT IN THE COASTAL ZONE.
Case Number:	ND-79-480-SP
Required Action(s):	SP-SPECIFIC PLAN (INCLUDING AMENDMENTS)
Project Description(s):	Data Not Available
Case Number:	ED-74-631-SUD-O
Required Action(s):	SUD-SUPPLEMENTAL USE DISTRICT ("K" DIST., "O" DISTRICT, ETC.) O-METHODS AND CONDITIONS - OIL DRILLING CASES
Project Description(s):	Data Not Available
Case Number:	ED-74-2641-03-143-ZC
Required Action(s):	ZC-ZONE CHANGE
Project Description(s):	Data Not Available

DATA NOT AVAILABLE

ORD-186108
ORD-173381
ORD-171492
ORD-171227
ORD-163205
ORD-161766
ORD-157559-SA14A
ORD-153639
ORD-147445
ORD-146541
ORD-129279
PRIOR-07/29/1962

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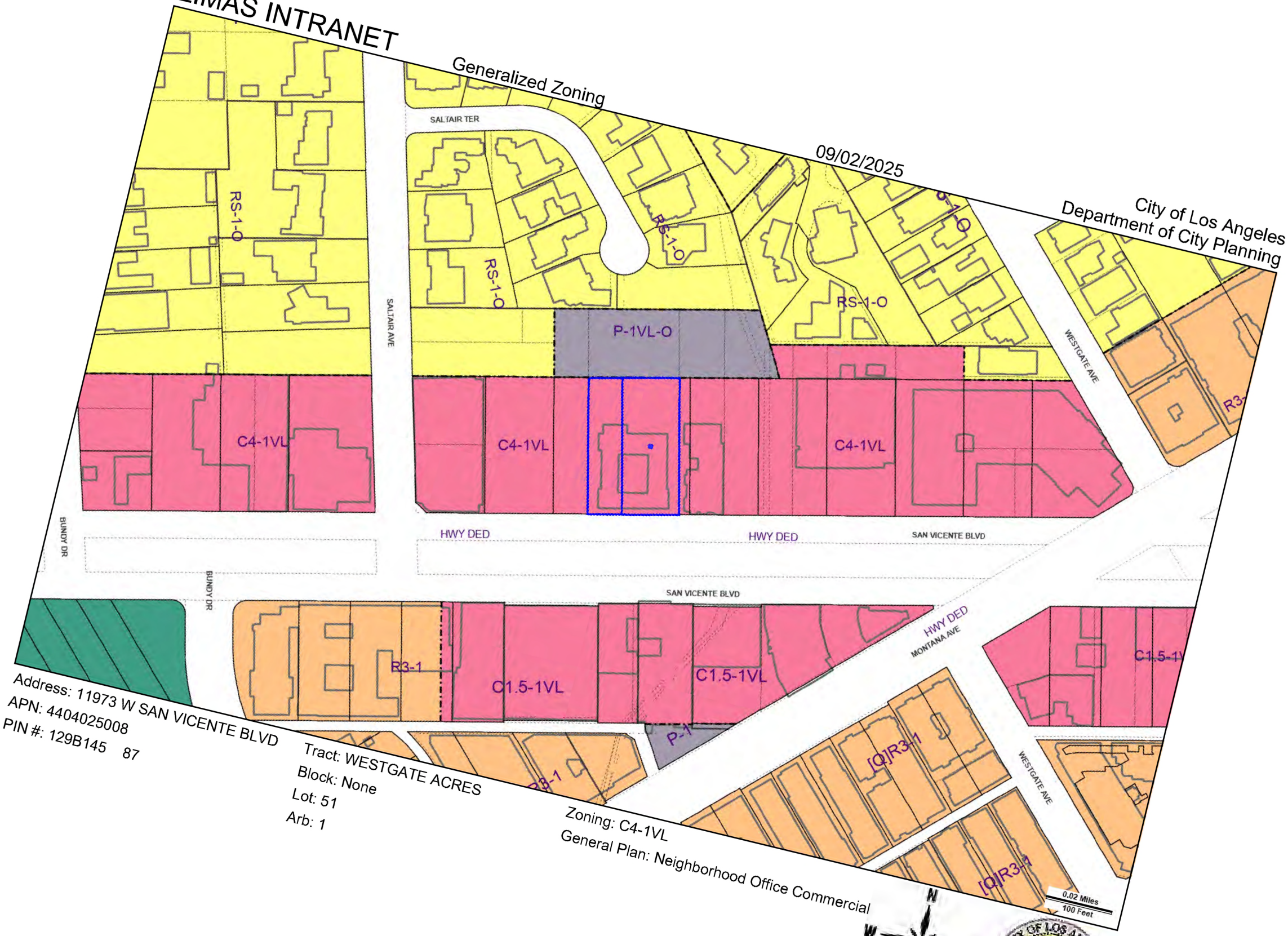
ZIMAS INTRANET

Generalized Zoning

09/02/2025

City of Los Angeles
Department of City Planning



Address: 11973 W SAN VICENTE BLVD
APN: 4404025008
PIN #: 129B145 87

Tract: WESTGATE ACRES
Block: None
Lot: 51
Arb: 1

Zoning: C4-1VL
General Plan: Neighborhood Office Commercial

LEGEND

GENERALIZED ZONING

- OS, GW
- A, RA
- RE, RS, R1, RU, RZ, RW1
- R2, RD, RMP, RW2, R3, RAS, R4, R5, PVSP
- CR, C1, C1.5, C2, C4, C5, CW, WC, ADP, LASED, CEC, USC, PPSP, MU, NMU
- CM, MR, CCS, UV, UI, UC, M1, M2, LAX, M3, SL, HJ, HR, NI
- P, PB
- PF

GENERAL PLAN LAND USE

LAND USE

RESIDENTIAL

- Minimum Residential
- Very Low / Very Low I Residential
- Very Low II Residential
- Low / Low I Residential
- Low II Residential
- Low Medium / Low Medium I Residential
- Low Medium II Residential
- Medium Residential
- High Medium Residential
- High Density Residential
- Very High Medium Residential

COMMERCIAL

- Limited Commercial
- Limited Commercial - Mixed Medium Residential
- Highway Oriented Commercial
- Highway Oriented and Limited Commercial
- Highway Oriented Commercial - Mixed Medium Residential
- Neighborhood Office Commercial
- Community Commercial
- Community Commercial -Mixed High Residential
- Regional Center Commercial

INDUSTRIAL

- Commercial Manufacturing
- Limited Manufacturing
- Light Manufacturing
- Heavy Manufacturing
- Hybrid Industrial

PARKING

- Parking Buffer

PORT OF LOS ANGELES

- General / Bulk Cargo - Non Hazardous (Industrial / Commercial)
- General / Bulk Cargo - Hazard
- Commercial Fishing
- Recreation and Commercial
- Intermodal Container Transfer Facility Site

LOS ANGELES INTERNATIONAL AIRPORT

- Airport Landside / Airport Landside Support
- Airport Airside
- LAX Airport Northside

OPEN SPACE / PUBLIC FACILITIES

- Open Space
- Public / Open Space
- Public / Quasi-Public Open Space
- Other Public Open Space
- Public Facilities

FRAMEWORK

COMMERCIAL

- Neighborhood Commercial
- General Commercial
- Community Commercial
- Regional Mixed Commercial

INDUSTRIAL

- Limited Industrial
- Light Industrial

CHAPTER 1A LEGEND

General Plan Designation

- Transit Core
- Traditional Core
- Regional Center
- High Residential
- Community Center
- Village
- Neighborhood Center
- Medium Neighborhood Residential
- Medium Residential
- Low Neighborhood Residential
- Low Medium Residential
- Low Residential
- Compact Residential
- Very Low Residential
- Minimum Residential
- Agriculture
- Hybrid Industrial
- Markets
- Light Industrial
- Production
- Industrial
- Open Space
- Public Facilities
- Public Facilities - Freeways

Zone Use Districts

- Open Space
- Agricultural
- Residential Single Family
- Residential Multiple Family
- Residential-Mixed
- Commercial
- Commercial-Mixed
- Industrial
- Industrial-Mixed
- Public
- Freeway

CIRCULATION

STREET

- Arterial Mountain Road
- Collector Scenic Street
- Collector Street
- Collector Street (Hillside)
- Collector Street (Modified)
- Collector Street (Proposed)
- Country Road
- Divided Major Highway II
- Divided Secondary Scenic Highway
- Local Scenic Road
- Local Street
- Major Highway (Modified)
- Major Highway I
- Major Highway II
- Major Highway II (Modified)
- Major Scenic Highway
- Major Scenic Highway (Modified)
- Major Scenic Highway II
- Mountain Collector Street
- Park Road
- Parkway
- Principal Major Highway
- Private Street
- Scenic Divided Major Highway II
- Scenic Park
- Scenic Parkway
- Secondary Highway
- Secondary Highway (Modified)
- Secondary Scenic Highway
- Special Collector Street
- Super Major Highway

FREEWAYS

- Freeway
- Interchange
- On-Ramp / Off- Ramp
- Railroad
- Scenic Freeway Highway

MISC. LINES

- Airport Boundary
- Bus Line
- Coastal Zone Boundary
- Coastline Boundary
- Collector Scenic Street (Proposed)
- Commercial Areas
- Commercial Center
- Community Redevelopment Project Area
- Country Road
- DWP Power Lines
- Desirable Open Space
- Detached Single Family House
- Endangered Ridgeline
- Equestrian and/or Hiking Trail
- Hiking Trail
- Historical Preservation
- Horsekeeping Area
- Local Street
- MSA Desirable Open Space
- Major Scenic Controls
- Multi-Purpose Trail
- Natural Resource Reserve
- Park Road
- Park Road (Proposed)
- Quasi-Public
- Rapid Transit Line
- Residential Planned Development
- Scenic Highway (Obsolete)
- Secondary Scenic Controls
- Secondary Scenic Highway (Proposed)
- Site Boundary
- Southern California Edison Power
- Special Study Area
- Specific Plan Area
- Stagecoach Line
- Wildlife Corridor

POINTS OF INTEREST

- Alternative Youth Hostel (Proposed)
- Animal Shelter
- Area Library
- Area Library (Proposed)
- Bridge
- Campground
- Campground (Proposed)
- Cemetery
- HW Church
- City Hall
- Community Center
- Community Library
- Community Library (Proposed Expansion)
- Community Library (Proposed)
- Community Park
- Community Park (Proposed Expansion)
- Community Park (Proposed)
- Community Transit Center
- Convalescent Hospital
- Correctional Facility
- Cultural / Historic Site (Proposed)
- Cultural / Historical Site
- Cultural Arts Center
- DMV DMV Office
- DWP DWP
- DWP Pumping Station
- Equestrian Center
- HQ Fire Department Headquarters
- Fire Station
- Fire Station (Proposed Expansion)
- Fire Station (Proposed)
- Fire Supply & Maintenance
- Fire Training Site
- Fireboat Station
- Health Center / Medical Facility
- Helistop
- Historic Monument
- Historical / Cultural Monument
- Horsekeeping Area
- Horsekeeping Area (Proposed)
- Horticultural Center
- Hospital
- Hospital (Proposed)
- HW House of Worship
- e Important Ecological Area
- e Important Ecological Area (Proposed)
- Interpretive Center (Proposed)
- JC Junior College
- M MTA / Metrolink Station
- M MTA Station
- MTA Stop
- MWD MWD Headquarters
- Maintenance Yard
- Municipal Office Building
- P Municipal Parking lot
- Neighborhood Park
- Neighborhood Park (Proposed Expansion)
- Neighborhood Park (Proposed)
- Oil Collection Center
- P Parking Enforcement
- HQ Police Headquarters
- Police Station
- Police Station (Proposed Expansion)
- Police Station (Proposed)
- Police Training site
- PO Post Office
- Power Distribution Station
- Power Distribution Station (Proposed)
- Power Receiving Station
- Power Receiving Station (Proposed)
- C Private College
- E Private Elementary School
- Private Golf Course
- Private Golf Course (Proposed)
- JH Private Junior High School
- PS Private Pre-School
- Private Recreation & Cultural Facility
- SH Private Senior High School
- SF Private Special School
- E Public Elementary (Proposed Expansion)
- E Public Elementary School
- E Public Elementary School (Proposed)
- Public Golf Course
- Public Golf Course (Proposed)
- Public Housing
- Public Housing (Proposed Expansion)
- JH Public Junior High School
- JH Public Junior High School (Proposed)
- MS Public Middle School
- SH Public Senior High School
- SH Public Senior High School (Proposed)
- Pumping Station
- Pumping Station (Proposed)
- Refuse Collection Center
- Regional Library
- Regional Library (Proposed Expansion)
- Regional Library (Proposed)
- Regional Park
- Regional Park (Proposed)
- RPD Residential Plan Development
- Scenic View Site
- Scenic View Site (Proposed)
- ADM School District Headquarters
- SC School Unspecified Loc/Type (Proposed)
- Skill Center
- SS Social Services
- Special Feature
- Special Recreation (a)
- SF Special School Facility
- SF Special School Facility (Proposed)
- Steam Plant
- sm Surface Mining
- Trail & Assembly Area
- Trail & Assembly Area (Proposed)
- UTL Utility Yard
- Water Tank Reservoir
- Wildlife Migration Corridor
- Wildlife Preserve Gate

SCHOOLS/PARKS WITH 500 FT. BUFFER

- Existing School/Park Site
- Planned School/Park Site
- Inside 500 Ft. Buffer

- Aquatic Facilities
- Beaches
- Child Care Centers
- Dog Parks
- Golf Course
- Historic Sites
- Horticulture/Gardens
- Skate Parks
- Other Facilities
- Park / Recreation Centers
- Parks
- Performing / Visual Arts Centers
- Recreation Centers
- Senior Citizen Centers
- Opportunity School
- Charter School
- Elementary School
- Span School
- Special Education School
- High School
- Middle School
- Early Education Center

COASTAL ZONE

- Coastal Commission Permit Area
- Dual Permit Jurisdiction Area
- Single Permit Jurisdiction Area
- Not in Coastal Zone

TRANSIT ORIENTED COMMUNITIES (TOC)

- Tier 1
- Tier 2
- Tier 3
- Tier 4

Note: TOC Tier designation and map layers are for reference purposes only. Eligible projects shall demonstrate compliance with Tier eligibility standards prior to the issuance of any permits or approvals. As transit service changes, eligible TOC Incentive Areas will be updated.

WAIVER OF DEDICATION OR IMPROVEMENT

- Public Work Approval (PWA)
- Waiver of Dedication or Improvement (WDI)

MIXED INCOME INCENTIVE PROGRAM (MIIP)

TRANSIT ORIENTED INCENTIVE AREAS (TOIA)

- T-1
- T-2
- T-3
- Outside of TOIA

OPPORTUNITY CORRIDORS (OC)

- OC-1
- OC-2
- OC-3

CORRIDOR TRANSITION INCENTIVE AREAS (CT)

- CT-1
- CT-2
- CT-3

OTHER SYMBOLS

- Lot Line
- Tract Line
- Lot Cut
- Easement
- Zone Boundary
- Building Line
- Lot Split
- Community Driveway
- Building Outlines 2020
- Building Outlines 2017
- Airport Hazard Zone
- Census Tract
- Coastal Zone
- Council District
- LADBS District Office
- Downtown Parking
- Fault Zone
- Fire District No. 1
- Tract Map
- Parcel Map
- Flood Zone
- Hazardous Waste
- High Wind Zone
- Hillside Grading
- Historic Preservation Overlay Zone
- Specific Plan Area
- Very High Fire Hazard Severity Zone
- Wells - Acitive
- Wells - Inactive

EXHIBIT B1

FORM GEN. 160 (REV. 6-80)

CITY OF LOS ANGELES
DEPARTMENT OF BUILDING AND SAFETY

LETTER OF DETERMINATION

DATE: 06/06/2025

TO: 11973 San Vicente, LLC
C/o Alston & Bird
Attn: Ed Casey
333 Hope Street, 16th Floor
Los Angeles, CA 90071

FROM: Binh Phan, Chief
Permit and Engineering Bureau

SUBJECT: Demolition of the Building Located at 11973 San Vicente Boulevard (Historic-Cultural Monument No. LA-887)

PROJECT DESCRIPTION:

The proposed 11973 W. San Vicente Boulevard Project (Project or Proposed Project) consists of the demolition of an existing two-story commercial building, commonly referred to as the Barry Building, a designated Historic-Cultural Monument.

Pursuant to Los Angeles Municipal Code (LAMC) Section 91.106.4.5, the Department of Building and Safety (LADBS) shall not issue a permit to demolish a building designated as a Historic-Cultural Monument (HCM) without LADBS first determining whether the demolition "may result in the loss of or serious damage to a significant historical or cultural asset." If LADBS determines that such loss or damage may occur, a CEQA clearance is required to be prepared, and if the HCM is considered significant, no demolition permit may be issued without LADBS first "finding that specific economic, social, or other considerations make infeasible the preservation of the building or structure."

To comply with Section 91.106.4.5, the Department of City Planning (DCP) prepared and processed an environmental impact report (EIR), EIR findings, and a statement of overriding considerations for LADBS' consideration for the Proposed Project.

DETERMINATION:

In accordance with the California Environmental Quality Act (CEQA) and related City procedures, the following determinations and actions are taken by LADBS after its review and consideration of the whole of the record, including the EIR, communications by DCP, all submissions by the Applicant's representatives, the recommendation of the Cultural Heritage Commission, and any and all communications on the Project to DCP or LADBS:

1. **Environmental Impact Report Determination**

   Pursuant to CEQA Guidelines Section 15132, it is determined that the Final Environmental Impact Report (FEIR), which includes the Draft EIR (SCH No. 2020110210, ENV-2019-6645-EIR) dated February 2023, the Draft EIR appendices, and the document titled "Final EIR" dated September 2023 (including all related appendices and attachments), complies with CEQA requirements.

2. **Certification of the FEIR**

   The Los Angeles Department of Building and Safety (LADBS) certifies that:

   a. The FEIR has been completed in full compliance with CEQA;
   b. The FEIR was presented to the LADBS and the LADBS has reviewed and considered the information contained in the FEIR prior to approval of the Project, and all of the information contained therein has substantially influenced all aspects of the decision by the LADBS; and
   c. The FEIR reflects the independent judgment and analysis of the LADBS.

3. **Adopts the following:**

   a. The Mitigation Monitoring Program (MMP);
   b. The EIR Findings dated 04/18/2025 (attached at Exhibit 'A');
   c. The Statement of Overriding Considerations, found on pages 36-39 of the EIR Findings (Exhibit "A"). The LADBS further finds that each identified benefit of the Proposed Project, as listed in the Statement of Overriding Considerations, independently justifies approval of the Project and overrides all identified significant and unavoidable impacts of the Proposed Project; and
   d. A finding that based upon the whole of the record, including the EIR Findings and the Statement of Overriding Consideration in Exhibit 'A,' a demolition permit may be issued because specific economic, social, or other considerations make infeasible the preservation of the building at 11973 W. San Vicente Boulevard.

4. **Custodian of Records**

   LADBS records related to this project are available through the LADBS Records Section at the following locations:

   Metro Office
   201 N. Figueroa Street, 1st Floor, Room 110
   Los Angeles, CA 90012

   Van Nuys Office
   6262 Van Nuys Boulevard, 2nd Floor, Room 251
   Van Nuys, CA 91401

All other records of proceedings shall be maintained by the Department of City Planning. The Director of Planning shall serve as the custodian of these records, which are kept at:

Department of City Planning
221 North Figueroa Street, Suite 1350
Los Angeles, CA 90012

5. Notice of Determination

Staff from the Department of City Planning is directed to file a Notice of Determination with the County Clerk in accordance with the Public Resources Code and CEQA Guidelines within five (5) days of mailing of this letter.

NOTICE RE APPEALS:

Appeal to Board of Building & Safety Commissioners

This determination may be appealed pursuant to LAMC Section 98.0403.1(b)(2) by any interested party within thirty-five (35) days of mailing of this letter. To file an appeal, please follow the instructions in Exhibit 'B' and email the applicable completed form to Board of Building and Safety Secretary Veronica Lopez veronica.lopez@lacity.org, (213) 482-7429 or file it in person at 201 North Figueroa Street, Suite 1030 Los Angeles, CA 90012.

CEQA Appeal

This determination and any determination upon an appeal described in Exhibit 'B' is an "approval" and a final decision for purposes of CEQA. If the determination is upheld on an appeal to the Board of Building and Safety Commissioners (Board), the Board's determination is appealable to the City Council pursuant to LAMC Section 13B.11.1.F. If this determination is not appealed, the determination is final for purposes of CEQA and no further CEQA appeal is available, including upon issuance of the demolition permit after referral to the Cultural Heritage Committee, as described below.

Referral to CHC

To the extent this decision becomes final, either because no appeal is filed or it is ultimately upheld on appeal, before issuance of the demolition permit on the Project, the demolition permit will be referred to the Cultural Heritage Commission (CHC) pursuant to Los Angeles Administrative Code (LAAC) Sections 22.171.14 and 22.171.15. Under these Sections, the CHC and the City Council have authority to suspend issuance of a demolition permit to hold public hearings addressing preservation of a monument, but CHC and the City do not have the authority to condition or deny a demolition permit for any purpose, including to mitigate or avoid environmental impacts. As such, any action under LAAC Sections 22.171.14 or 22.171.15 is not appealable for purposes of CEQA or otherwise.

Please feel free to contact me for further details or clarifications.

Attachments: Exhibit 'A' EIR Findings
Exhibit 'B' DBS Information Bulletin re Appeals

cc: Vincent P. Bertoni, AICP, Director of Planning
Milena Zasadzien, Principal City Planner
Mindy Nguyen, Senior City Planner

"Exhibit A"

06/06/2025

EIR Findings

I. Introduction.

The Environmental Impact Report (EIR), consisting of the Draft EIR and the Final EIR, is intended to serve as an informational document for public agency decision-makers and the general public regarding the objectives and environmental impacts of 11973 San Vicente Boulevard Project (Project), located at 11973-11975 San Vicente Boulevard (Assessor Parcel No. 4404-025-008), on the north side of San Vicente Boulevard between Montana Avenue and Saltair Avenue (Site or Project Site). The Project consists of demolition of the existing two-story commercial building, commonly referred to as the Barry Building, located on the Project Site. The existing building is a City of Los Angeles Historic-Cultural Monument (HCM) that has been vacant and fenced since 2017. The proposed Project consists of the demolition of the Barry Building. Once demolition activities are complete, the portion of the Project Site that currently contains the Barry Building would be a vacant lot, and the existing surface parking lot would remain. A landscape buffer would be installed along the southern boundary of the Project Site (fronting San Vicente Boulevard). No future development of the Project Site is proposed or considered as part of the Project.

The City of Los Angeles (City), as Lead Agency, has evaluated the environmental impacts of implementation of the Project by preparing an environmental impact report (EIR) (Case Number ENV-2019-6645-EIR/State Clearinghouse No. 2020110210). The EIR was prepared in compliance with the California Environmental Quality Act of 1970 (CEQA), Public Resources Code (PRC) Section 21000 et seq. and the California Code of Regulations Title 15, Chapter 6 (CEQA Guidelines). The findings discussed in this document are made relative to the conclusions of the EIR.

PRC Section 21002 provides that "public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects[.]" The procedures required by CEQA "are intended to assist public agencies in systematically identifying both the significant effects of proposed projects and the feasible alternatives or feasible mitigation measures which will avoid or substantially lessen such significant effects." PRC Section 21002 goes on to state that "in the event [that] specific economic, social, or other conditions make infeasible such project alternatives or such mitigation measures, individual projects may be approved in spite of one or more significant effects thereof."

The mandate and principles announced in PRC Section 21002 are implemented, in part, through the requirement that agencies must adopt findings before approving projects for which EIRs are required. (See PRC Section 21081[a]; CEQA Guidelines Section 15091[a].) For each significant environmental impact identified in an EIR for a proposed project, the approving agency must issue a written finding, based on substantial evidence in light of the whole record, reaching one or more of the three possible findings, as follows:

1) Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the significant impacts as identified in the EIR.

2) Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been, or can or should be, adopted by that other agency.

3) Specific economic, legal, social, technological, other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the EIR.

The findings reported in the following pages incorporate the facts and discussions of the environmental impacts that are found to be significant in the Final Environmental Impact Report for the project as fully set forth therein. Although Section 15091 of the CEQA Guidelines does not require findings to address environmental impacts that an EIR identifies as merely "potentially significant", these findings nevertheless fully account for all such effects identified in the Final EIR for the purpose of better understanding the full environmental scope of the Project. For each environmental issue analyzed in the EIR, the following information is provided:

The findings provided below include the following:

- Description of Significant Effects - A description of the environmental effects identified in the EIR.
- Project Design Features - A list of the project design features or actions that are included as part of the Project.
- Mitigation Measures - A list of the mitigation measures that are required as part of the Project to reduce identified significant impacts.
- Finding - One or more of the three possible findings set forth above for each of the significant impacts.
- Rationale for Finding - A summary of the rationale for the finding(s).
- Reference - A reference of the specific section of the EIR which includes the evidence and discussion of the identified impact.

With respect to a project for which significant impacts are not avoided or substantially lessened either through the adoption of feasible mitigation measures or feasible environmentally superior alternatives, a public agency, after adopting proper findings based on substantial evidence, may nevertheless approve the project if the agency first adopts a statement of overriding considerations setting forth the specific reasons why the agency found that the project's benefits rendered acceptable its unavoidable adverse environmental effects. (CEQA Guidelines Sections 15093, 15043[b]; see also PRC Section 21081[b].)

II. Environmental Review Process.

For purposes of CEQA and these Findings, the Record of Proceedings for the Project includes (but is not limited to) the following documents:

Initial Study. The Project was reviewed by the City of Los Angeles Department of City Planning (Lead Agency) in accordance with the requirements of the CEQA (PRC 21000 et seq.). The City prepared an Initial Study in accordance with Section 15063(a) of the State CEQA Guidelines in November 2020. The Initial Study is included as Appendix A-1 of the Draft EIR.

Notice of Preparation. Pursuant to the provisions of Section 15082 of the State CEQA Guidelines, the City then circulated a Notice of Preparation (NOP) to State, regional and local agencies, and members of the public for a 33-day period commencing on November 18, 2020,

and ending on December 12, 2020. The purpose of the NOP was to formally inform the public that the City was preparing a Draft EIR for the Project, and to solicit input regarding the scope and content of the environmental information to be included in the Draft EIR. Written comment letters responding to the NOP were submitted to the City by from four agencies and organizations (Department of Transportation, Department of Fish and Wildlife, Native American Heritage Commission, and South Coast Air Quality Management District) and from individuals. The NOP and NOP comment letters are included in Appendix A-2 and A-3 of the Draft EIR.

Draft EIR. The Draft EIR evaluated in detail the potential effects of the Project. It also analyzed the effects of a reasonable range of alternatives to the Project, including a "No Project" alternative. The Draft EIR for the Project (State Clearinghouse No. 2020110210), incorporated herein by reference in full, was prepared pursuant to CEQA and State, Agency, and City CEQA Guidelines (City of Los Angeles California Environmental Quality Act Guidelines). The Draft EIR was circulated for a 46-day public comment period beginning on February 16, 2023, and ending on April 3, 2023. That comment period was extended by the Lead Agency for 15 days to and through April 18, 2023. A Notice of Availability (NOA) was distributed on February 16, 2023, to all property owners within 500 feet of the Project Site and interested parties, which informed them of where they could view the document and how to comment. The Draft EIR was available to the public at the City of Los Angeles, Department of City Planning, and the following local libraries: Los Angeles Central Library, West Los Angeles Regional Library, and the Donald Bruce Kaufman Branch Library. A copy of the document was also posted online at https://planning.lacity.org. Notices were filed with the County Clerk on February 16, 2023.

Notice of Completion. A Notice of Completion was sent with the Draft EIR to the Governor's Office of Planning and Research State Clearinghouse for distribution to State Agencies on February 15, 2023, and notice was provided in newspapers of general and/or regional circulation.

Final EIR. The City released a Final EIR for the Project on September 11, 2023, which is hereby incorporated by reference in full. The Final EIR constitutes the second part of the EIR for the Project and is intended to be a companion to the Draft EIR. The Final EIR also incorporates the Draft EIR by reference. Pursuant to Section 15088 of the CEQA Guidelines, the City, as Lead Agency, reviewed all comments received during the review period for the Draft EIR and responded to each comment in Section II, Responses to Comments, of the Final EIR. On September 7, 2023, responses were sent to all public agencies that made comments on the Draft EIR at least 10 days prior to certification of the EIR pursuant to CEQA Guidelines Section 15088(b). Notices regarding availability of the Final EIR were also sent to property owners and occupants within a 500-foot radius of the Project Site, as well as anyone who commented on the Draft EIR, and interested parties.

Cultural Heritage Commission. On September 5, 2024, the Cultural Heritage Commission (CHC) considered the matter of certification of the EIR by LADBS and instructed staff to communicate their recommendation to LADBS action on certification of the EIR and adoption of the Statement of Overriding Considerations.

III. Record of Proceedings.

For purposes of CEQA and these Findings, the Record of Proceedings for the Project includes (but is not limited to) the following documents and other materials that constitute the administrative record upon which the City approved the Project. The following information is incorporated by reference and made part of the record supporting these Findings of Fact:

- All Project plans and application materials including supportive technical reports;
- The Draft EIR and Appendices, and Final EIR and Appendices, and all documents relied upon or incorporated therein by reference;
- The Mitigation Monitoring Program (MMP) prepared for the Project;
- The City of Los Angeles General Plan and related EIR;
- The Southern California Association of Governments (SCAG)'s 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) and related EIR (SCH No. 2019011061);
- Municipal Code of the City of Los Angeles;
- All records of decision, resolutions, staff reports, memoranda, maps, exhibits, letters, minutes of meetings, summaries, and other documents approved, reviewed, relied upon, or prepared by any City commissions, boards, officials, consultants, or staff relating to the Project;
- Any documents expressly cited in these Findings of Fact, in addition to those cited above; and
- Any and all other materials required for the record of proceedings by PRC Section 21167.6(e).

Pursuant to PRC Section 21081.6(a)(2) and CEQA Guidelines Section 15091(e), the documents and other materials that constitute the record of proceedings upon which the City has based its decision are located in and may be obtained from the Department of City Planning, as the custodian of such documents and other materials that constitute the record of proceedings, located at the City of Los Angeles, Figueroa Plaza, 221 North Figueroa Street, Room 1350, Los Angeles, CA 90012.

In addition, copies of the Draft EIR and Final EIR are available on the Department of City Planning's website at https://planning.lacity.org/development-services/eir (to locate the documents, search for either the environmental case number or project title in the Search Box). The Draft and Final EIR are also available at the following three Library Branches:

- Los Angeles Central Library—630 West Fifth Street, Los Angeles, CA 90071
- West Los Angeles Regional Library—11360 Santa Monica Blvd., Los Angeles, CA 90025
- Donald Bruce Kaufman Branch Library—11820 San Vicente Blvd., Los Angeles, CA 90049

IV. Project Description.

The Project consists of the demolition of the Barry Building, a two-story commercial building on a 0.61-acre site (APN 4404-025-008) located at 11973-11975 San Vicente Boulevard.

In 2007, the City of Los Angeles Cultural Heritage Commission designated the building as HCM No. 887. The building has been vacant and fenced off since 2017, and is boarded up with screwed-on plywood panels to prevent vandalism, loitering, and other public safety hazards associated with the current vacancy of the Barry Building.

The building is subject to the City's Soft Story Retrofit Program (LAMC Section 91.9300 et seq., Ordinance 183,893 entitled Mandatory Earthquake Hazard Reduction in Existing Wood Frame Buildings with Soft, Weak or Open Front Walls ["Soft Story Ordinance"]). The Ordinance applies to buildings with a "soft story," or building (or portion thereof) with no ascertainable lateral system. (See *11971 San Vicente Boulevard – Retrofit Schemes (Soft Story Memorandum),* Englekirk Structural Engineers (Rev. June 3, 2022) included as Appendix H-3 to the Draft EIR). The Soft Story Ordinance requires the owner of each building within the Ordinance's scope to undertake a structural analysis of the building. If the building does not meet the minimum earthquake standards specified, "the owner shall cause the building to be structurally altered to conform to such standards or, at the owner's option, cause it to be demolished within the time limits stated." (LAMC Section 91.9305.1.) In March 2018, the City of Los Angeles issued the Project Applicant an Order to Comply with the City's Soft Story Retrofit Program. Specifically, the Order to Comply requires the Project Applicant to comply with the following requirements as set forth in LAMC Section 91.9305.2

The building must be renovated or demolished in accordance with the Soft Story Ordinance or face penalties. A seismic assessment of the building was prepared. (See *11973 San Vicente Boulevard ASCE 41-13 Seismic Assessment,* Englekirk Structural Engineers (June 6, 2022), included as Appendix G to the Draft EIR.) The retained structural engineers identified that only a portion of the building has a "soft story" and is required to comply with the Ordinance. (See *11971 San Vicente Boulevard – Retrofit Schemes (Soft Story Memorandum),* Englekirk Structural Engineers (Rev. June 3, 2022) included as Appendix H-3 to the Draft EIR. See also *11971 San Vicente Boulevard – Retrofit Schemes (Soft Story Retrofit Letter Report)*, Englekirk Structural Engineers (June 1, 2021) included as Attachment H-2 to the Draft EIR.) The seismic assessment determined that there are high levels of overstress in the other portions of the building, and that the building is likely to suffer significant damage when subject to a moderate to strong earthquake in the Los Angeles basin, which presents a safety hazard to people in and around the building. The seismic engineers determined that additional renovations would be required to make the building suitable for occupancy above those required by the Soft Story Ordinance.

Englekirk Structural Engineers also determined that the seismic instability of the Barry Building is due to its 1950's building design, rather than lack of maintenance or neglect on behalf of the owner. Buildings designed and constructed in the early 1950's had low seismic demands and requirements; however, current requirements are much higher. Englekirk also noted, as in its prior report, in addition to the seismic retrofit work required under the Soft Story Ordinance for the south wing of the building, the north, east, and west wings of the building are currently up to 650% overstressed and would also require renovation. While the California Historical Building Code allows historic buildings to meet only 75% of the current building code forces, due to the very high level of overstress in the building substantial work, including strengthening the existing shear walls and floor/roof plywood diaphragm, and adding shear walls and moment frames would still be required. Temporary wooden frames are not a valid retrofit option because it would not meet current requirements under either the Uniform Building Code or the Historical Building Code. (See *Barry Building (11973 San Vicente Boulevard, Los Angeles, CA 90049) Los Angeles Conservancy Comments Review*, Englekirk Structural Engineers, (May 25, 2023), included as Attachment I to the Final EIR.)

Per LAMC Section 91.9305.1, which provides that it is "the owner's option" to demolish the building, the Project Applicant has proposed to demolish the existing building in order to comply with the Soft Story Ordinance.

Once demolition activities are complete, the portion of the Project Site that currently contains the Barry Building would be a vacant lot, and the portion of the existing surface parking lot that is on the Project Site would remain. Demolition would take place within the Project Site, while the adjacent parcel to the north (APN 4404-025-016, which is not part of the Project Site) would be used for staging. No demolition work is proposed within the public right-of-way. Demolition of the building would result in the removal of approximately 4,174 cubic yards of debris from the Project Site, including approximately 130 cubic yards of asbestos-containing materials and 4,044 cubic yards of demolition materials.

In accordance with the San Vicente Scenic Corridor Specific Plan, a landscape buffer would be installed along the southern boundary of the Project Site (fronting San Vicente Boulevard). As part of the Project, three on-site palm trees would be removed (a Chinese windmill palm, a king palm, and a queen palm); however, the fourth on-site palm (Mexican fan palm) in the surface parking lot and two street trees (both London plane trees) located along San Vicente Boulevard would remain.

The Project is anticipated to last approximately 36 working days, with one additional day to plant the landscape buffer.

No future development of the Project Site is proposed and/or considered as part of the Project. No additional permits, approvals, or entitlements are requested. To this end, the Project Applicant has provided a statement, signed and notarized, that certifies that the permit for demolition is not sought to facilitate construction or development of a larger project. (See Attachment to Application for Demolition Permit: Owner's Declaration Related to CEQA and Project Scope, included as Attachment B-2 to the Final EIR.)

V. No Impact or Less than Significant Impact without Mitigation

The impacts of the Project that were determined to have no impact or be less than significant in the EIR (including having a less than significant impact as a result of implementation of project design features and compliance with existing regulations) and that require no mitigation are identified below. The City has reviewed the record and agrees with the conclusion that the following environmental impacts would not be significantly affected by the Project and therefore, no additional findings are needed. The following information does not repeat the full discussions of environmental impacts contained in the EIR. The City ratifies, adopts, and incorporates the analysis, explanation, findings, responses to comments, and conclusions of the EIR.

Summary of Impacts Evaluated in the Initial Study Only

The Initial Study (Appendix A-1 of the Draft EIR) considered effects with respect to the following: aesthetics, agricultural and forestry resources, air quality (odors), biological resources, cultural resources (archeological resources and human remains), energy, geology and soils, hazards and hazardous materials, hydrology and water quality, land use and planning (physically divide an established community), mineral resources, noise (airport noise), population and housing, public services, recreation, transportation/traffic (plan consistency, VMT, and design feature hazards), utilities and service systems, and wildfire, but found that the Project would either have no impact or a less than significant impact with respect to each of these topics. No mitigation was required, and no further analysis of these topics was needed in the Draft EIR. (See Initial Study attached as Appendix A-1 to the Draft EIR, and Draft EIR Section VI.6.)

Aesthetics: The Project would not have a substantial adverse on a scenic vista, scenic resources, public views, or create a new source of light or glare. While the Project Site is located within the boundaries of the San Vicente Scenic Corridor Specific Plan, the plan area is not considered a scenic vista, and the Specific Plan establishes streetscape and urban design criteria only to protect the pedestrian-scale and community-oriented commercial nature along San Vicente Boulevard. Since no future development of the Project Site is proposed or considered as part of the Project, the Project would not increase building height on the Project Site or alter panoramic views that include the Project Site or interfere with current views. In addition, the Project would not conflict with applicable regulations governing scenic quality. The aesthetic impact was therefore determined to be less than significant. (Appendix A-1 to the Draft EIR, page 24. See also Draft EIR, page VI-9.)

Agricultural and Forestry Resources: The Project Site is currently developed with a commercial building, does not contain any agricultural uses. The Project Site is currently zoned C4-1VL, for commercial uses, and is not zoned for agricultural use, forest land or timberland. The Initial Study determined that the Project would have no impact on agricultural or forestry resources, as it would not convert any farmland, does not conflict with any agricultural zoning, would not result in forest loss, nor would it create changes to the existing environment which could result in the loss of agricultural or forested land. (See Appendix A-1 to the Draft EIR, page 31.).

Air Quality (odors): The Project consists solely of the demolition of the existing commercial building, and no future development of the Site is proposed and/or considered as part of the Project. Therefore, the Project would not include any of the uses identified by the SCAQMD *CEQA Air Quality Handbook* as being associated with substantial odors. Further, any odors that may be generated during demolition would be localized and temporary in nature, and would not have the potential to affect a substantial number of people or result in a nuisance as defined by SCAQMD Rule 402. (See Appendix A-1 to the Draft EIR, page 36.)

Biological Resources: Due to the developed nature of the Project Site and lack of any natural open spaces, there are no candidate, sensitive, or special status species identified that would be impacted by the Project.[1] Furthermore, there are no riparian areas, sensitive natural communities, or Significant Ecological Areas as defined by the City of Los Angeles located on or adjacent to the Project Site. Demolition of the existing building would not interfere substantially with any established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites. (See Appendix A-1 to the Draft EIR, page 37.)

Cultural Resources (archeological resources and human remains): The Project Site is located in an urbanized area of the City and has been disturbed by past development activities.

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[1] Cycads have been identified by a commentator as existing in the courtyard of the Barry Building. However, cycads are not native to California and are not protected by California native plant protection laws, the California Endangered Species Act (CESA), or addressed by the Appendix G questions in CEQA (thresholds of significance) which specifically refer to native plants. (See Email from Jacqueline Bowland Worden, Lead Biologist/Natural Resources Project Manager, SWCA Environmental Consultants (May 26, 2023) included as Attachment K-2 to the Final EIR and *The Barry Building – 11973 San Vicente Boulevard, Los Angeles, California 90049*, Carlberg Associates (May 19, 2023) included as Attachment K-1 to the Final EIR.)

There are no known archaeological resources at the Project Site, nor are there any known traditional burial sites or other type of cemetery usage has been identified with the Project Site and immediate vicinity. As such, Project impacts would be less than significant to archeological cultural resources and human remains, and no further analysis of this topic in the EIR was required. (See Appendix A-1 to the Draft EIR, page 41.) Additional analysis of Cultural Resources (historic resources) was provided in the Draft EIR. (See Section IV.B of the Draft EIR.)

Energy: The proposed demolition activities would consume relatively minor quantities of electricity. No future development of the Site is proposed and/or considered as part of the Project; therefore, the Project would not have an operational demand for energy, with the exception of a limited amount of electricity for sprinklers to water the landscape buffer. Thus, the Project would not result in an increase in demand for electricity, natural gas, or petroleum that exceeds available supply or distribution infrastructure capabilities. (See Appendix A-1 to the Draft EIR, page 44.)

Geology and Soils: Impacts related to geology and soils are all less than significant. The Project Site is not located within a known earthquake fault, nor is it within a liquefaction zone. As the Project involves the demolition of an existing seismically unsafe building, the Project would not expose people or structures to substantial adverse effects associated with geology or soils. (See Appendix A-1 to the Draft EIR, page 52.)

Hazards and Hazardous Materials: Based on the age of the existing building, it is assumed that it contains asbestos containing materials (ACMs). In accordance with existing rules and regulations, all materials which are identified as ACMs, would be removed by a trained and licensed asbestos abatement contractor. The Project will not create any significant impacts related to hazards or hazardous materials. (See full analysis in Appendix A-1 to the Draft EIR, page 60.)

Hydrology and Water Quality: Based on the limited timeframe for demolition (seven weeks), the small size of the Project Site, the additional pervious area on the Site after demolition, and the lack of an operational component to the Project, the Project would not be expected to substantially degrade surface or ground water quality or conflict with any water quality standards or plans. Impacts on hydrology and water quality would be less than significant. (See Appendix A-1 to the Draft EIR, page 65.)

Land Use and Planning (physically divide an established community): The Project does not contain features such as highways or new infrastructure that would cause a permanent disruption in the physical arrangement of the surrounding uses. Therefore, no impact would occur. Additional Land Use and Planning impacts are discussed below. (See Appendix A-1 to the Draft EIR, page 70.)

Mineral Resources: The Project would not result in the loss of a known mineral resource; Project Site is not located within a City-designated oil field or oil drilling area, nor is the Project Site is located within a City-designated Mineral Resource Zone where significant mineral deposits are known to be present. Demolition of the Barry Building will have no impact on mineral resources. (See Appendix A-1 to the Draft EIR, page 71.)

Noise (Operational Noise and Vibration, Airport noise): The Project would not include an operational phase, and therefore would not result in impacts related to operational noise or operational vibration. The Project Site is not located within an airport land use plan or within two miles of a public airport or public use airport. There are no private airstrips in the vicinity of the Project Site. Therefore, no impact would occur. Additional noise impacts are discussed below. (See Appendix A-1 to the Draft EIR, page 73.)

Population and Housing: The Project-related demolition activities would not represent a permanent or substantial new employment generator that would result in substantial unplanned population growth either directly or indirectly. The Project would not displace any housing or residents, as there is no housing on the Project Site. Therefore, no impact would occur. (See Appendix A-1 to the Draft EIR, page 75.)

Public Services: The Project would not result in substantial adverse physical impacts associated with the need or provision of new or physically altered governmental facilities. Demolition activities associated with the Project may temporarily increase demand for fire protection (emergency medical services) and police protection, however, demolition activities would be required to comply with all applicable federal, State, and City safety regulations and impacts would be less than significant. As there is no operational component to the Project, there is no impact to schools, parks, or other public facilities. (See Appendix A-1 to the Draft EIR, page 77.)

Recreation: No future development of the Site is proposed and/or considered as part of the Project. Thus, he Project would have no impact on recreation. (See Appendix A-1 to the Draft EIR, page 84.)

Transportation (plan consistency, VMT, and design feature hazards): The demolition of the Barry Building would not conflict with any program plan or policy regarding the circulation system, nor would it conflict with CEQA Guidelines Section 15064.3, subdivision (b) (regarding VMT), or increase hazards due to a geometric design feature. Thus, there would be no impact to these areas. (See Appendix A-1 to the Draft EIR, page 86.)

Utilities and Service Systems: Demolition and construction activities typically do not involve the consumption of natural gas, the need for telecommunications infrastructure, or result in the generation of wastewater that would need to be treated by wastewater treatment infrastructure that serves the Project Site. There is sufficient landfill capacity to accommodate the solid waste generated by the demolition of the existing building, and impacts would be less than significant. (See Appendix A-1 to the Draft EIR, page 92.)

Wildfire: The Project Site is not located in or near a state responsibility area, within a City-designated Very High Fire Hazard Severity Zone, or within a City-designated buffer zone. Therefore, no impact regarding this topic would occur. (See Appendix A-1 to the Draft EIR, page 97.)

Cumulative Impacts: With regards to cumulative effects with respect to aesthetics, agricultural resources, biological resources, energy, geology and soils, hazards and hazardous materials, hydrology and water quality, mineral resources, population and housing, public services, recreation, utilities and service systems, and wildfire as identified in the Initial Study, the Project's

incremental contribution to potential cumulative impacts would not be cumulatively considerable as the Project would either have no impact or a less than significant impact with respect to these topics, and therefore could not combine with other projects to result in cumulative impacts. (See Appendix A-1 to the Draft EIR, page 100.)

Summary of Impacts Evaluated in the EIR

The Draft EIR concluded that the following applicable impacts would be less than significant without additional mitigation: Air Quality, Noise (groundborne vibration) Greenhouse Gas Emissions, Transportation/Traffic (emergency access) and Tribal Cultural Resources. (See Draft EIR Section I at I-7 and Section VI.6.) The EIR also considered potential cumulative impacts for each impact. The related projects list consists of seven projects provided by the City of Los Angeles Department of Transportation (LADOT) detailed in Section III of the Draft EIR. (See Table III-1, page III-3.)

Air Quality: The Project includes the demolition of the existing building, but no future development of the Project Site is proposed and/or considered as part of the Project. The demolition would be short term and as a result would not exceed any applicable air quality thresholds. Ss discussed in Section IV.A of the Draft EIR, the Project would not conflict with or obstruct implementation of the applicable air quality plan, exceed any applicable significance threshold or regulatory standard, or expose any sensitive receptors to substantial pollutant concentrations. Finally, the Project would not result in any significant cumulative air quality impacts and thus would not require any mitigation. (See full analysis in Section IV.A of the Draft EIR.) No significant cumulative impacts to air quality were identified, and no mitigation measures are required. (See Draft EIR, Section IV.A-37.)

Greenhouse Gas Emissions: The EIR compared the Project's characteristics with applicable regulations, plans, and policies to reduce greenhouse gas (GHG) emissions and found that the project would not conflict with plan, policy, or regulation adopted for the purpose of reducing GHG emissions. Thus, as noted in Section IV.C of the Draft EIR, impacts are less than significant, and no mitigation is required. (See Section IV.C of the Draft EIR.) In addition, no significant cumulative impacts to GHG emissions were identified, and no mitigation measures are required. (See Draft EIR Section IV.C-39.)

Land Use and Planning (conflict with plan or policy): With regard to the San Vicente Scenic Corridor Specific Plan, the issuance of a Demolition Permit will not change the land use or zoning designations of the Project Site. A vacant lot is not on the list of uses prohibited within the Specific Plan (Specific Plan, Section 5: Uses). A discussion of the Project's consistency with the applicable provisions of the San Vicente Scenic Corridor Specific Plan is provided in Table 4.I-3 of the Initial Study (Appendix A-1 to the Draft EIR) and a discussion of the Project's consistency with the applicable design guidelines contained in the San Vicente Scenic Corridor Specific Plan is provided in Table 4.I-4 of the Initial Study (Appendix A-1 to the Draft EIR. See also IV.D of the Draft EIR.). The Project would not conflict with any of those applicable policies and guidelines, and thus no impacts would occur. Cumulative impacts related to land use and planning would be less than significant without mitigation.

Noise (groundborne construction vibration): The Project's estimated construction vibration impacts at nearby receptors sensitive to the human annoyance effects of ground-borne vibration would not exceed the applicable 72 VdB threshold of significance. As a result, the Project's human

annoyance-related vibration impacts as generated by on-site construction activities would be less than significant. Off-site vibration was also analyzed by the EIR and was found to be less than significant, and no mitigation is required. (See Section IV.E of the Draft EIR.) Cumulative on-site and off-site construction vibration impacts related to human annoyance would be less than significant. (See Draft EIR Section IV.E-35.)

Transportation/Traffic (emergency access): Project construction activities would not generate a significant number of daily trips during peak hours or increase congestion in the Project vicinity that could affect emergency access. The Project's impacts to transportation / traffic are less than significant. (Section IV.F of the Draft EIR). In addition, the Project includes a Project Design Feature (PDF-TRA-1 Demolition Management Plan) requiring the Project Applicant to prepare a detailed Demolition Management Plan. (See Section IV.F of the Draft EIR, page IV.F-12.) The Project's cumulative impacts related to emergency access would be less than significant. (See Draft EIR Section IV.F-17.)

Tribal Cultural Resources: No specific tribal cultural resources were identified at the Project Site by either a sacred lands file search, a California Historical Resources Information System records searches, or in consultation with California Native American Tribes. The Project Site was determined to have a low sensitivity for containing unknown tribal cultural resources, and the Project would only disturb soils that have been previously disturbed by past development activities. Therefore, Project's impacts with respect to tribal cultural resources would be less than significant without mitigation, as noted in Section IV.G of the Draft EIR. cumulative impacts to tribal cultural resources would be less than significant and would not be cumulatively considerable. (See Draft EIR Section IV.G-12.)

VI. Less than Significant Impacts with Mitigation

The EIR determined that the Project has potentially significant environmental impacts in the areas discussed below. The EIR identified feasible mitigation measures to avoid or substantially reduce the environmental impacts in these areas to a level of less than significant. Based on the information and analysis set forth in the EIR, the Project would not have any significant environmental impacts in these areas, as long as all identified feasible mitigation measures are incorporated into the Project. The City again ratifies, adopts, and incorporates the full analysis, explanation, findings, responses to comments, and conclusions of the EIR.

Noise (temporary or permanent increase in noise)

Impact Summary

The Project Site is occupied by an approximately 13,956 square foot commercial building that is vacant and boarded up, and is therefore assumed to generate no noise. Construction would generate noise during the approximately 36 working days of demolition activities (see Table II-1 in Section II of the Draft EIR, Project Description, for the proposed Project schedule), with one additional day to install the landscape buffer.

The Draft EIR evaluated the noise expected as a result of the Project through on-site construction, off-site construction, and vibration-producing activities (discussed previously). Analysis of the activities and equipment planned to be used at the Project Site evaluated the unmitigated noise impacts that could result from excavator and loader usage during the Project's proposed demolition of the Barry Building. Noise increases at 640 Saltair Avenue, 11900 Saltair Terrace,

and 529 Westgate. Avenue could exceed the City's 5 dBA Leq increase significance criteria. As a result, without mitigation, this impact would be considered significant.

With respect to LAMC Section 112.05, no individual piece of equipment (i.e., no individual excavator or loader or backhoe) is estimated to generate a noise level in excess of 75 dBA L_{eq} as measured at a distance of 50 feet. As a result, the Project's impact as it pertains to the generation of noise levels in excess of noise ordinance standards would be considered less than significant.

The Project would also generate noise at off-site locations from haul trucks removing debris from the Project Site during demolition activities. Haul trucks would access the Project Site via San Vicente Boulevard. According to FHWA TNM 2.5 modeling, the Project's off-site noise impacts from construction-related traffic truck traffic would be less than significant.

The Project, together with related projects and future growth, was evaluated for potential cumulative noise impacts. A total of seven related projects were identified in the study area. (See Table III-1 for list of related projects.) The closest related project is more than 1,000 feet from the Project Site; it would not combine with the Project to result in a cumulative construction noise impact. The Draft EIR determined that cumulative noise due to construction truck traffic from the Project and related projects would not have the potential to exceed the ambient noise levels along the haul route or other streets by 5 dBA. Thus, Project impacts would not be cumulatively considerable and cumulative construction noise impacts would be less than significant.

Project Design Features

No specific project design features (PDFs) are proposed with regard to noise.

Mitigation Measures

To ensure that the Project's construction-related noise increases at 640 Saltair Avenue, 11900 Saltair Terrace, and 529 Westgate Avenue do not exceed the City's 5 dBA L_{eq} threshold of significance, the following mitigation measure is required:

MM-NOI-1 Sound barriers rated to achieve a sound attenuation of at least 15 dBA shall be erected along the following boundaries:

- The east and west parking area boundaries (both the Project Site's east and west parking area boundaries and the east and west boundaries of the parcel immediately to the north of the Project Site (APN 4404-025-016)). (While the parcel to the north of the Project Site is not part of the Project, that parcel would be used for construction staging.)
- The northern property line of the parcel to the north of the Project Site (APN 4404-012-016) that separates this parcel from the residential uses to the north. Sound barriers along this property line shall be connected to the previously described sound barriers for the east and west property lines, so that there are no gaps.

All sound barriers shall be tall enough to shield line of sight paths from operating demolition equipment to the 2nd stories of nearby residential uses. The prescribed sound barriers shall be installed for the duration of the Project's demolition activities, which are estimated to last approximately 36 working days. At plan check, building plans shall include documentation prepared by a noise consultant to verify compliance with this measure.

Finding

Changes or alterations have been required in, or incorporated into, the project which mitigate or avoid the significant effects on the environment (PRC Section 21081(a)(1))

Rationale for Finding

Implementation of Mitigation Measure MM-NOI-1 would reduce demolition-related noise impacts to below the City's 5 dBA L_{eq} significance criteria. As shown in Draft EIR Section IV.E, Table IV.E-7, building demolition-related noise increases at 640 Saltair Avenue, 11900 Saltair Terrace, and 529 Westgate Avenue would be no greater than 1.1 dBA after implementation of Mitigation Measure MM-NOI-1. Therefore, the Project's noise impact from on-site demolition activities would be considered less than significant with mitigation.

Reference

See Draft EIR Section IV.E and Appendix D of the Draft EIR for complete analysis of the noise impacts, thresholds, and evaluation methods conducted for the Project.

VII. Significant and Unavoidable Impacts

The Final EIR determined that the environmental impacts set forth below are significant and unavoidable. In order to approve the project with significant unmitigated impacts, the City is required to adopt a Statement of Overriding Considerations, which is set forth in Section XII, below. No additional environmental impacts other than those identified below will have a significant effect or result in a substantial or potentially substantial adverse effect on the environment as a result of the construction or operation of the project. The City finds and determines that:

a) All significant environmental impacts that can be feasibly avoided have been eliminated, or substantially lessened through implementation of the project design features and/or mitigation measures; and

b) Based on the Final EIR, the Statement of Overriding Considerations set forth below, and other documents and information in the record with respect to the construction and operation of the project, all remaining unavoidable significant impacts, as set forth in these findings, are overridden by the benefits of the project as described in the Statement of Overriding Considerations for the construction and operation of the project and implementing actions.

Cultural Resources (historic resources)

Impact Summary

The Barry Building was constructed in 1951 by David Barry, Jr., who hired architect Milton Caughey[2] to design the two-story commercial office building with shops on the ground floor, wrapping a central courtyard lushly landscaped with tropical plants. In 1993, a one-story receiving and storage addition was constructed on the north side of the building. An additional alteration in that area in 1993 was removal of the screens separating the rear patios from the parking lot. A

[2] Caughey's work consisted primarily of residences and schools; the Barry Building is one of his few commercial projects.

ramp was added on the southeast side to enter the courtyard space. The landscaped courtyard has also been altered over time.

The Project Site is currently developed with the two-story Barry Building and a surface parking lot. It is set back from San Vicente Boulevard by a narrow concrete-paved plaza with low planters. The building is flanked to the east by a shared driveway and to the north by the surface parking lot. The building consists of four wings of offices around a central garden courtyard, forming an open square in plan. The building has flat roofs at varying heights, with parapets around the perimeter and cantilevered plaster soffits with wood fascia around the courtyard. Two curved staircases, one in the northeast corner and one in the southwest corner, provide access to the cantilevered second-story balconies that encircle the courtyard. Each staircase consists of "floating" concrete treads in steel pans supported on triangular concrete mono stringers, with metal pipe railings.

The second story of the south wing is supported on slender steel pipe columns, leaving the ground floor open to both San Vicente Boulevard and the central courtyard. A small freestanding structure, slightly rotated from the building's orthogonal plan relative to San Vicente Boulevard, is located under the southeast corner. The interiors of the office suites are finished with wood flooring, plaster walls, and textured acoustical plaster ceilings.

The Barry Building was designated by the City as a Historic-Cultural Monument (HCM) No. 887 in 2007. The property is significant under the City's Cultural Heritage Ordinance Criterion 1, because it reflects "the broad cultural, political, economic or social history of the nation, state, or community." The building was the longtime home of Dutton's Brentwood Books and fostered a sense of cultural identity along the San Vicente commercial corridor in Brentwood. The Barry Building is also significant under City's Cultural Heritage Ordinance Criterion 3, because it "embodies the distinguishing characters of an architectural-type specimen, inherently valuable for a study of a period, style of method of construction," as an example of International Style architecture. The Barry Building is an example of Mid-century Modern commercial architecture in Los Angeles and embodies a distinctly local expression of the style. The period of significance for the context/theme/property type combination is 1945-1975. The Barry Building retains integrity of location, design, setting, materials, workmanship, and feeling. It is therefore eligible for listing in the National Register and the California Register. Details of the criteria, eligibility standards, character-defining features, and integrity considerations are provided in the Historical Resources Technical Report included as Appendix C-1 of the Draft EIR.

The Project would demolish the Barry Building and all those physical characteristics that convey its historical significance and that justify its designation as a City HCM, and its eligibility for listing in the California Register and the National Register. Thus, the Project would materially impair the significance of the Barry Building and would cause a substantial adverse change in the significance of an historical resource as defined by CEQA. Therefore, Project impacts related to historical resources would be significant and unavoidable.

As discussed in Section IV.B of the Draft EIR, cumulative impacts to historical resources would be less than significant. While the Project would demolish the Barry Building, resulting in a Project-specific significant and unavoidable impact, the Barry Building is not a contributor to any established historic district or HPOZ and does not contribute to the significance of any other individual historical resources.

Project Design Features

No specific project design features (PDFs) are proposed with regard to cultural resources.

Mitigation Measures

The following measure has been required for the Project:

MM-CUL-1 Prior to the issuance of a demolition permit, the Barry Building shall be documented to meet Historic American Buildings Survey (HABS) Level I standards. The documentation shall include a full set of measured drawings depicting existing conditions; photographs with large format negatives of exterior and interior views; photocopies with large format negatives of select existing drawings and historic views that are produced in accordance with the U.S. Copyright Act (as amended); and a written history and description. The documentation shall be submitted to the Library of Congress, with copies given to the Los Angeles Conservancy and the Los Angeles Public Library. A digital copy of the documentation shall be submitted to the South Central Coastal Information Center at California State University, Fullerton.

Finding

Specific economic, legal, social, technological, other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the EIR. (PRC Section 21081(a)(3))

Rationale for Finding

As discussed in Section II (Project Description) of the Draft EIR, the Project consists of the demolition of the Barry Building, which has been vacant and fenced off since 2017, and the installation of a landscape buffer along the southern boundary of the Project Site. The existing building is currently designated as a City of Los Angeles HCM. Adopting Mitigation Measure MM-CUL-1, which will document the existing building's historical significance, will not eliminate the Project's significant impacts to cultural resources, which are the result of demolition of an HCM. Therefore, as discussed in Draft EIR Section IV.B, the Project's impacts to cultural resources will be significant and unavoidable. Mitigation Measure MM-CUL-1, provided above, requires the Barry Building to be documented to meet HABS Level I standards prior to demolition. However, even after implementation of Mitigation Measure MM-CUL-1, Project impacts would remain significant and unavoidable as the Project would demolish the existing historical resource. Further, all feasible mitigation measures have been imposed on the Project, mitigation measures such as interpretive programs, incorporation of materials into a new building, or a commemorative plaque would not reduce impacts, provide additional benefits not otherwise provided by the HABS survey detailed above, or are impractical because no new development is proposed. Therefore, as the Project is demolition of a building with no new construction, all feasible mitigation measures have been imposed on the Project. Further, Alternatives 1, 2, and 3 of the Draft EIR studied alternatives to demolition that could potentially mitigate effects but were determined infeasible. In addition, relocation of the building is technically impractical and infeasible due to the size of the building and the logistical requirements to move the structure. Dismantling the building for relocation would pose a significant risk to the buildings character-defining features.

Reference

See Section IV.B and Section VI of the Draft EIR for complete analysis of the cultural resources impacts, thresholds, and evaluation methods conducted for the Project.

Land Use and Planning (conflict with plan or policy)

Impact Summary

The Project Site has a General Plan land use designation of Neighborhood Office Commercial and is zoned C4-1VL (Commercial Zone, Height District 1VL). The Commercial Zone permits a range of commercial uses including retail and office uses. Within Height District 1VL, the C4 zone allows for a building height maximum of up to 45 feet and establishes a floor area ratio (FAR) of 1.5:1.

As the Project would result in the demolition of an existing historical resource, the Project would conflict with the applicable objectives and policies in the City of Los Angeles General Plan - Conservation Element related to the preservation of historical resources. Therefore, the Project would result in a potentially significant impact with respect to consistency with the City of Los Angeles General Plan (Conservation Element).

The Project would also conflict with several of the applicable goals, objectives, and policies within the Brentwood – Pacific Palisades Community Plan that are related to the preservation of historical resources. See Section IV.D, Table IV.D-1 of the Draft EIR. Therefore, the Project would result in a potentially significant impact with respect to consistency with the Brentwood-Pacific Palisades Community Plan.

The Project would not result in any changes to the General Plan land use designation and zoning regulations applicable to the Project Site. However, the Project would conflict with the goals, objectives, and policies of the General Plan (Conservation Element) and the Brentwood-Pacific Palisades Community Plan related to historic preservation, which are the primary goals, objectives, and policies applicable to the Project since development of the Project Site is not proposed.

As described in Draft EIR Section IV.B, Cultural Resources, Mitigation Measure MM-CUL-1 would be undertaken by the Project Applicant, which requires the Barry Building to be fully documented prior to demolition.

Even with implementation of Mitigation Measure MM-CUL-1, the Project would conflict with the applicable land use goals, objectives, and policies as the Project would demolish the existing historical resource. Therefore, Project impacts related to land use and planning would remain significant and unavoidable.

Project Design Features

No specific project design features (PDFs) are proposed with regard to land use and planning.

Mitigation Measures

The Project would be required to implement MM-CUL-1, discussed above, which would mitigate impacts to cultural resources, and by extension applicable goals, objectives, and policies related to historic preservation.

Finding

Specific economic, legal, social, technological, other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the EIR. (PRC Section 21081(a)(3))

Rationale for Finding

As evaluated in Section IV.D of the Draft EIR, the Project would conflict with the applicable policies of the General Plan (Conservation Element) and the Brentwood-Pacific Palisades Community Plan related to historic preservation. Even with implementation of Mitigation Measure MM-CUL-1, the Project would continue to conflict with the applicable land use goals, objectives, and policies as the Project would demolish the existing historical resource. Therefore, Project impacts related to land use and planning would remain significant and unavoidable. However, there were no other mitigation measures identified in the EIR that avoid that significant impact. Further, Alternatives 1, 2, and 3 of the Draft EIR studied alternatives to demolition that could potentially mitigate effects but were determined infeasible. In addition, relocation of the building is technically impractical and infeasible due to the size of the building and the logistical requirements to move the structure. Dismantling the building for relocation would pose a significant risk to the buildings character-defining features.

Therefore, there are no feasible mitigation measures or alternatives that would reduce impacts to related to land use to less than significant.

Reference

See Draft EIR Sections IV.D and Section VI for complete analysis of the land use and planning impacts, thresholds, and evaluation methods conducted for the Project.

VIII. Alternatives

CEQA requires that an EIR analyze a reasonable range of feasible alternatives that could substantially reduce or avoid the significant impacts of a project while also meeting the project's basic objectives. An EIR must identify ways to substantially reduce or avoid the significant effects that a project may have on the environment (PRC Section 21002.1). Accordingly, the discussion of alternatives shall focus on alternatives to a project or its location which are capable of avoiding or substantially reducing any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly. The alternative analysis included in the Draft EIR, therefore, identified a reasonable range of project alternatives focused on avoiding or substantially reducing the project's significant impacts.

Summary of Findings

Based upon the following analysis, the City finds, pursuant to CEQA Guidelines Section 15091, that no feasible alternative or mitigation measure will substantially lessen any significant effect of the project, reduce the significant unavoidable impacts of the project to a level that is less than significant, or avoid any significant effect the project would have on the environment.

Project Objectives

The objectives of the Project are as follows:

1. Comply with the City's Soft Story Retrofit Program (LAMC Section 91.9300 et seq., Ordinance entitled Mandatory Earthquake Hazard Reduction in Existing Wood Frame Buildings with Soft, Weak or Open Front Walls), which includes complying with the requirements under LAMC Section 91.9305.2.

2. Abate the fire, loitering, vandalism, and other public safety hazards associated with structural defects and current vacancy of the Barry Building.

Alternatives Analyzed

Alternative 1 – No Project Alternative

Description of Alternative

CEQA requires the alternatives analysis to include a "no project" alternative, which is the circumstance under which the Project does not proceed. The purpose of analyzing a No Project Alternative is to allow decision makers to compare the impacts of approving the project with the impacts of not approving the project (CEQA Guidelines Section 15126.6, subd. (e)(1)).

This alternative assumes that the Project would not be implemented, and the existing building would not be demolished. However, in March 2018, the City of Los Angeles issued the Applicant an Order to Comply with the City's Soft Story Retrofit Program. (See LAMC Section 91.9305.2(1)(c), (2), and (3).) Thus, even under a "no project" alternative, some alternations to the Barry Building must be made. In a "no project" alternative where the building is not demolished, then it must be retrofitted to avoid penalties under the Soft Story Ordinance. However, Alternative 1 assumes only the minimum seismic retrofit work would be undertaken to comply with the Soft Story Ordinance, but no other seismic retrofit work would be undertaken and therefore the building would not be operational under this alternative.

Englekirk Structural Engineers prepared a technical report dated May 26, 2021 (included in Appendix H-2 of the Draft EIR) that included a structural analysis to repair the existing building to conform to the City's Soft Story Ordinance (see "Phase I" discussion in Appendix H-2). According to the Englekirk report, the south wing of the building that faces San Vicente Boulevard utilizes a pass-through at the ground floor that accesses the interior courtyard. As a result, there are no bearing walls that extend to the foundation and instead the second floor is supported on a series of isolated steel columns.

To comply with the City's Soft Story Retrofit Program, Englekirk developed a seismic retrofit scheme that consists of steel moment frame structures that are located within the building and are supported on new concrete footings. However, compliance with the retrofit required by the Soft Story Ordinance would not address structural deficiencies identified in the east, north, or west wing as provided in Englekirk's Seismic Assessment (see Appendix H-3 and Appendix G of the Draft EIR).

Therefore, if the remaining building wings are not structurally retrofitted, the work to the south wing of the building would not be sufficient to protect building occupants if the building was subject to a moderate to severe seismic event. In addition, the south wing alone, which is on the second story of the building, could not be occupied as occupants would need to take one of two stairways and travel along other wings of the building that have not been retrofitted in order to reach the south wing. As such, the building could not be safely occupied under Alternative 1. This alternative would not address the building's other areas of noncompliance, specifically under the ADA and the Building Code.

Impact Summary

All of Alternative 1's impacts would be less than significant, including with respect to historical resources and land use. The Project would result in a significant and unavoidable impact with respect to historical resources and land use, as the Project would demolish the existing building, which is City HCM No. 887. As Alternative 1 involves the retention of the existing building, Alternative 1 would result in similar impacts as the Project related to Air Quality, Greenhouse Gas

Emissions, Noise, Transportation, Tribal Cultural Resources, and would avoid the Project's significant and unavoidable impacts with respect to Cultural Resources (historical resources) and Land Use and Planning (conflict with plans).

Finding

Specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the environmental impact report. (PRC 21081(a)(3).)

Rationale for Finding

As discussed above, Alternative 1 involves the retention of the existing building, with minor seismic retrofitting, resulting in a structure that would be unsuitable for full occupation. Alternative 1 would avoid the significant impacts related to historical resources and land use. However, as discussed in Englekirk Structural Engineers technical report dated May 26, 2021, with the seismic retrofitting to comply with the requirements of the City's Soft Story Retrofit Program, the building would still present a seismic risk and safety hazard and could not be occupied. This is because the structural retrofit required by the Soft Story Ordinance only addresses the structural deficiencies in the south wing, and does not address the east, north, or west wing structural deficiencies. Further, the building would not meet ADA requirements for accessibility, further limiting its suitability for occupation. As discussed above, the alternative is not feasible because, even with compliance with the Soft Story Retrofit requirements, structural issues would remain, precluding occupation of much of the building and a reasonable return on investment, while persisting as a safety hazard. The structural condition of the building, combined with lack of ADA compliance would present both economic and legal complications for the owner, as failure to comply with ADA regulations could result in legal and economic penalties were the building to be occupied. Feasibility is defined by PRC Section 15364 as "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors." As discussed above, specific economic, legal, technical, and social limitations make the alternative infeasible.

Per the CEQA Guidelines Section 15126.6 (a), reasonable project alternatives are those that "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, and evaluate the comparative merits of the alternatives." Accordingly, while this alternative would partially meet the first Project objective, this Alternative is still infeasible because it would not resolve the public safety consideration associated with a moderate to severe earthquake event. In such an event, there would still be a significant risk to public safety because of the structural deficiencies in the building wings not subject to the Soft Story Ordinance. Further, given that the building would remain unoccupied under this alternative, the property would remain vacant and therefore, would not meet the second Project objective. Therefore, this alternative would not meet most of the project objectives.

Therefore, per PRC Section 15364 and based on the above specific economic, legal, social and technical reasons Alternative 1 would be infeasible.

Reference

See Draft EIR Section V for complete analysis of alternatives evaluated for the Project.

Alternative 2 – Preservation Alternative

Description of Alternative

Alternative 2, the Preservation Alternative would involve the work required to comply with the City's Soft Story Ordinance (as with Alternative 1), in addition to a voluntary seismic retrofit on the remainder of the building, and renovations to ensure compliance with the ADA, building code, and energy efficiency upgrades of the existing building.

The voluntary seismic retrofit program proposed by Englekirk Structural Engineers (see "Phase II" discussion in the technical report contained in Appendix H-2 of the Draft EIR) would include strengthening existing walls, adding new two-story shear walls, adding new floor and roof diaphragm sheathing, and adding new steel moment frames.

In addition, various physical aspects of the building are not in compliance with the ADA and California Building Code provisions related to access to buildings and properties for people with disabilities (Title 24, Part 2, Vol. 2, Chapter 11B). These issues are detailed in the ADA Upgrade Report prepared by Gruen Associates, included in Appendix H-5 of the Draft EIR. Accordingly, in addition to the voluntary seismic retrofit described above, Alternative 2 would also include an ADA upgrade, which would include upgrades related to an accessible path of travel, plumbing, stairs and balcony railing, vertical transportation, and tenant space improvements. Finally, certain aspects of the building do not meet California Building Code requirements. Therefore, Alternative 2 includes the following work to bring the building into compliance with the Code and other energy efficiency requirements.

Upon completion of the voluntary seismic retrofit, and ADA, building code, and energy efficiency upgrades, the building could be re-occupied by approximately 12,800 square feet of retail uses.

In the analysis provided below, asbestos abatement activities, which would take place prior to all other work, are anticipated to last two weeks. Performing the additional preservation measures is estimated to take approximately six months. Finishing activities, such as paving and applying new architectural coatings to the Barry Building, would take approximately one week each.

Impact Summary

As Alternative 2 involves the preservation of the existing building, Alternative 2 would avoid the Project's significant and unavoidable impacts with respect to historical resources and land use. However, as Alternative 2 includes an operational component (the re-occupancy of the building), Alternative 2 would result in greater impacts than the Project with respect to air quality, greenhouse gas emissions, noise, and traffic, although these impacts would still be less than significant.

While the additional construction would not result in exceedances of significance thresholds because there is no demolition activity under this Alternative, to further minimize Alternative 2's construction-related noise increases at 11900 Saltair Terrace and other sensitive receptors, the Draft EIR identified the following mitigation measure:

ALT2 MM-1 Sound barriers rated to achieve a sound attenuation of at least 15 dBA shall be erected along the following boundaries:

- The east and west parking area boundaries (both the Project Site's east and west parking area boundaries and the east and west boundaries of the parcel immediately to the north of the Project Site (APN 4404-025-016)). (While the parcel to the north of the Project Site is not part of either the Project or Alternative 2, that parcel would be used for construction staging.)

- The northern property line of the parcel to the north of the Project Site (APN 4404-025-016) that separates this parcel from the residential uses to the north. Sound barriers along this property line shall be connected to the sound barriers described for the east and west property lines, so that all of Alternative 2's construction areas are fully enclosed by sound barriers.

The sound barriers shall be tall enough to shield line of sight paths from operating construction equipment to the 2nd stories of nearby residential uses. The prescribed sound barriers shall be installed for the duration of Alternative 2's construction activities.

Finding

Specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the environmental impact report. (PRC 21081(a)(3))

Rationale for Finding

Alternative 2 would meet both of the Project objectives. However, studies provided by the Applicant demonstrate that Alternative 2 is economically infeasible.

This alternative would include compliance with the Soft Story Ordinance, additional seismic renovations, ADA upgrades and building code compliance to prepare the building for occupancy.

An economic analysis (hereafter "Initial Renovation Cost Analysis") was conducted and submitted to the record on April 20, 2023, by the Applicant. The analysis attached the following reports:

- *11971 San Vicente Boulevard – Retrofit Schemes* by Englekirk Structural Engineers (June 2021) (Soft Story Retrofit Letter Report) (Attachment A);
- *11971 San Vicente Boulevard – Retrofit Schemes* by Englekirk Structural Engineers (June 2022) (Attachment B);
- *11973 San Vicente Boulevard, ASCE 41-13 Seismic Assessment* by Englekirk Structural Engineers (June 2022) (Attachment C);
- *Prcject Impacts Assessment, 11973 San Vicente Boulevard* by Historic Resources Group (October 2022) (Attachment D);
- *Barry Building ADA Update Requirements* by Gruen Associates (June 2021) (Attachment E);
- *Barry Building Renovations* by Hill International (November 2022) (Attachment F); and
- *Barry Building Land Residual Analysis* by CBRE, Inc. (March 2023) (Pro forma) (Attachment G)

In addition, updated economic analysis (hereafter "Additional Cost Analysis") was provided by the Applicant on July 15, 2024. Additional reports attached to this analysis included:

- *Revised Cost Estimate*, Hill International (June 27, 2024) (Attachment H to the Additional Cost Analysis); and
- *Revised Revenue Analysis*, CBRE, Inc. (July 2024) (Attachment I to the Additional Cost Analysis)

In November 2024, the Applicant provided additional economic analysis to the City (hereafter "Updated Cost Analysis"), including:

- *Barry Building Retrofit Scope Costs*, Hill International (October 3, 2024)
- *Barry Building Proposed Retrofit*, Englekirk Structural Engineers (September 9, 2004)
- *Barry Building – Opinion of Probable Retrofit Cost*, Hill International (November 6, 2024)
- *Appraisal Report*, CBRE, Inc. (November 8, 2024)

The Initial Renovation Cost Analysis is included in the Administrative Record. (See Letter from E. Casey to J. Harris, RE: *11973 San Vicente Boulevard Prcject / ENV-2019-6645-EIR / State Clearinghouse No. 2020110210* (April 20, 2023).) The Additional Cost Analysis was provided to the Office of Historic Resources, in a letter from E. Casey dated July 15, 2024. (See Letter from E. Casey to K. Bernstein, *RE: 11973 San Vicente Boulevard Prcject / ENV-2019-6645-EIR / State Clearinghouse No. 2020110210 ("Barry Building')* (July 15, 2024).) The Updated Cost Analysis was provided to the City on November 14, 2024. (See Letter from E. Casey to J. McCrea, *RE: 11973 San Vicente Boulevard Prcject / ENV-2019-6645-EIR / State Clearinghouse No. 2020110210* (November 14, 2024).) These analyses and related attachments are the entirety of the materials in the administrative record evaluating the economic feasibility of the Project Alternatives.

Collectively, the above-referenced reports found that a large number of modifications are required to renovate the Barry Building to meet minimum standards for safety and accessibility. In addition to the retrofits required under the Soft Story Ordinance, a seismic assessment (Attachment C to the Initial Renovation Cost Analysis and included as Appendix G to the Draft EIR) found that the building's the north, east, and west wings currently range from being 190-percent to 650-percent overstressed, and further recommended additional renovations to make the building seismically sound. In addition to seismic upgrades, the necessary upgrades for compliance with the ADA and building code were identified. (See Attachment E to the Initial Renovation Cost Analysis and included as Appendix H-5 to the Draft EIR).

Attachment F to the Initial Renovation Cost Analysis contains a Cost Report Regarding Barry Building Renovations, prepared by Hill International on November 2, 2022. Hill International estimated the cost of the each of the renovations identified to make the building suitable for occupancy, and estimated a total cost for the work. The cost of these renovations was approximately $12,818,000 as of November 2022.

In addition, a pro forma revenue analysis completed by CBRE in March 2023 analyzed the expected value of the land and rental income based on the real estate market and the costs to complete necessary renovations to determine the maximum revenue that would be generated from a rehabilitated Barry Building. (See Attachment G to the Initial Renovation Cost Analysis.)

CBRE evaluated Alternative 2 of the Draft EIR (the "Preservation Alternative"), including seismic retrofitting of the existing Barry Building, the ADA upgrades, and Building Code compliance renovations identified in the Hill International Report (discussed above). This alternative estimates a total of an approximate 12,800 square feet of retail uses (and includes some common areas like bathrooms). In addition to the $12,818,000 estimated cost to complete necessary renovations

(per Hill International, discussed above), leasing commissions, costs for improvements to the leased spaces ("Tenant Improvement Allowance"), transfer taxes and developer profit were considered. According to CBRE's analysis dated March 2023 (provided by the Applicant in April 2023) the total combined costs of Alternative 2 are estimated at $17,024,961.

CBRE determined that under the assumptions of Alternative 2, the annual gross rental income for the retrofitted Barry Building is estimated at approximately $736,960; the total value of the retrofitted Building is $11,361,308. (See Attachment G to the Initial Renovation Cost Analysis.)

Thus, CBRE concluded that to preserve the Barry Building per Alternative 2, the residual land value would be $11,361,308 minus $17,024,961, or negative $5,663,653. CBRE found that the proposed project alternative returns a negative valuation. That is, the total costs of the necessary renovations and preparing the Barry Building for lease are estimated to be greater than the value of the renovated property.

The Applicant provided additional analyses to the City in July 2024 which identified changes in the costs associated with Alternative 2. Hill International revised its analysis in June 2024 and determined that the cost to complete the rehabilitation work as of June 2024 had risen to approximately $17.1 million. (See Attachment H to the Additional Cost Analysis.) Hill International's revised analysis determined that from June 1, 2021, to June 26, 2024, the cost per square foot for this renovation work rose from $777 to $1,108. According to Hill International's analysis, this escalation is primarily driven by higher labor costs, increased material prices, and rising transportation and disposal fees.

CBRE's 2023 analysis previously provided by the Applicant was based on an income approach that could be derived from the Owner leasing space in the rehabilitated building. In July 2024, the Applicant also commissioned a 2024 Appraisal Report by CBRE based on a sales approach. This analysis was provided as Attachment I to the Additional Cost Analysis. CBRE 2024's report determined that the Barry Building Property, assuming rehabilitation of the existing building, has no market value and may even have a negative value of $5,672,747.

In addition to the economic analysis prepared by the Applicant evaluating Alternatives 2 and 3, the Applicant has also evaluated the economic feasibility of completing only the minimum rehabilitation required for compliance with the Soft Story Ordinance and the California Historic Building Code. In November 2024, the Applicant provided the following analyses to the City related to this proposed scenario as part of the Updated Cost Analysis:

- Barry Building Proposed Retrofit, Englekirk Structural Engineers (September 9, 2004)
- Barry Building Retrofit Scope Costs, Hill International (October 3, 2024)
- Barry Building – Opinion of Probable Retrofit Cost, Hill International (November 6, 2024)
- Appraisal Report, CBRE (November 8, 2024)

This scenario specifically accounts for the allowance per Section 8-706 of the California Historic Building Code for an historic building retrofit to meet only 75% of the current Building Code. The Applicant provided a Seismic Assessment prepared by Englekirk Structural Engineers identifying the work required under this more limited scope seismic retrofit work (the "75% Seismic Retrofit").

The required rehabilitation identified by Englekirk includes: reinforcing shear walls; adding plywood at floors and roof; adding or enlarging existing footings. (See Barry Building Proposed Retrofit, Englekirk Structural Engineers, September 9, 2004.)

The Applicant also provided an analysis of the costs associated with this narrowed scope of work under the 75% Seismic Retrofit scenario as compared to Alternative 2. An estimate prepared by Hill International excluded work previously considered within Alternative 2. (See Barry Building – Opinion of Probable Retrofit Cost, Hill International, November 6, 2024.) After reducing the June 27, 2024, cost estimate developed by Hill International (Attachment H to the Additional Cost Analysis) and accounting for the increase in construction costs due to the annualized inflation rate of 6.8%, Hill International determined that the cost to rehabilitate the Barry Building under this more limited scope of rehabilitation work is approximately $15,438,389. (See Barry Building Retrofit Scope Costs, Hill International, October 3, 2024.)

CBRE prepared an appraisal report for the Applicant considering the value of the rehabilitated Barry Building, complying with the California Historic Building Code per this scenario. CBRE compared similar recently sold properties and found that the price per square foot ranged from approximately $469 to $1,045. Excluding high and low extremes, CBRE determined the average price per square foot of comparable properties is approximately $630. CBRE used Hill's cost analysis of the minimum rehabilitation work required ($15,438,389) and reduced it by 20% to assume availability of a 20% rehabilitation tax credit. This assumption resulted in CBRE's estimate of cost to renovate the property at approximately $865 per square foot. This reduced cost is conservatively low as it does not include any indirect costs (which CBRE estimates could add 10-20%). CBRE's estimated cost of rehabilitation of $865 per square foot significantly exceeds the market price of the renovated property at $630 per square foot.

Based on the assumptions provided, CBRE determined that the resulting value of rehabilitating the Barry Building is approximately negative $3 million (excluding indirect costs). As a result, CBRE determined that the property has no (or negative) market value. (See Appraisal Report, CBRE, November 8, 2024.)

Alternative 2 would reduce or avoid the Projects impacts to Cultural Resources and Land Use but would result in greater impacts with respect to air quality, greenhouse gas emissions, noise, and traffic, as a result of an operational component, although these impacts would still be less than significant. Feasibility is defined by PRC Section 15364 as "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors." Although Alternative 2 would meet the Project objectives, and reduce some environmental impacts, substantial evidence in the administrative record submitted by the Applicant demonstrates that Alternative 2 would be economically infeasible.

Reference

See Draft EIR Section V for complete analysis of alternatives evaluated for the Project. See Appendices H-2, H-3, H-4, H-5, H-6, H-7 and G; Letter from E. Casey to J. Harris, RE: *11973 San Vicente Boulevard Prcject / ENV-2019-6645-EIR / State Clearinghouse No. 2020110210* (April

20, 2023) ("Initial Renovation Cost Analysis") and attachments; Letter from E. Casey to K. Bernstein (July 15, 2024) ("Additional Cost Analysis") and attachments; and Letter from E. Casey to J. McCrea, *RE: 11973 San Vicente Boulevard Prcject / ENV-2019-6645-EIR / State Clearinghouse No. 2020110210* (November 14, 2024) ("Updated Cost Analysis") and attachments.

Alternative 3 – Partial Preservation with New Construction Alternative

Description of Alternative

Alternative 3 includes the partial preservation of the existing building with new construction on the remaining portion of the Project Site. Specifically, Alternative 3 would preserve the south, east, and west wings of the building, the courtyard, and the south façade of the north wing. However, Alternative 3 would involve demolition of the building volume behind the south façade of the north wing. Alternative 3 would also include the work required to comply with the City's Soft Story Ordinance, as well as the voluntary seismic retrofit (see Appendix H-2 of the Draft EIR for a discussion of the work required to comply with the Soft Story Ordinance and the voluntary seismic retrofit), and ADA (see Appendix H-5 of the Draft EIR for a discussion of work need to comply with ADA requirements), building code, and energy efficiency upgrades, as described above for Alternative 2, to the preserved portion of the existing building.

In addition, Alternative 3 would include the construction of a new building behind the existing building (referred to as the "Annex"). The new building would be approximately 10,815 square feet in three stories (approximately 3,605 square feet per level). In total, Alternative 3 would include approximately 19,771 square feet of office and retail uses, consisting of 8,956 square feet of retail uses in the existing building and 10,815 square feet of office uses in the new building.

This work would be performed over an approximate seven-month period. Asbestos abatement activities, which would take place prior to all other work, are anticipated to last two weeks. Performing the additional preservation measures, as well as constructing the new office building, is estimated to take approximately seven months. Finishing activities, such as paving and application of architectural coatings, would take approximately one week each.

Impact Summary

As Alternative 3 involves the partial preservation of the existing building, Alternative 3 would avoid the Project's significant and unavoidable impacts with respect to historical resources and land use. However, as Alternative 3 involves the construction of a new building and also includes an operational component (the re-occupancy of the preserved portion of the existing building with retail uses and a new building with new office uses), Alternative 3 would result in greater impacts than the Project with respect to air quality, greenhouse gas emissions, noise, and traffic, although these impacts would still be less than significant.

Demolition of the Barry Building's north wing and grading for the proposed office building could result in substantial noise increases at nearby sensitive receptors. The resultant noise increase at the nearest sensitive receptor would be 12.5 dBA, which is above the City's significance threshold of 5 dBA. Without mitigation, this impact would be considered potentially significant. As a result, the following mitigation measure is required for Alternative 3:

> **ALT3 MM-1** Sound barriers rated to achieve a sound attenuation of at least 15 dBA shall be erected along the following boundaries:

- The east and west parking area boundaries (both the Project Site's east and west parking area boundaries and the east and west boundaries of the parcel immediately to the north of the Project Site (APN 4404-025-016)). (While the parcel to the north of the Project Site is not part of either the Project or Alternative 3, that parcel would be used for construction staging.)
- The northern property line of the parcel to the north of the Project Site (APN 4404-025-016) that separates this parcel from the residential uses to the north. Sound barriers along this property line shall be connected to the sound barriers described for the east and west property lines, so that all of Alternative 3's construction areas are fully enclosed by sound barriers.
- The sound barriers shall be tall enough to shield line of sight paths from operating paving equipment to the 2nd stories of nearby residential uses. The prescribed sound barriers shall be installed for the duration of Alternative 3's construction activities.

Finding

Specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the environmental impact report. (PRC 21081(a)(3))

Rationale for Finding

Alternative 3 would meet both of the Project objectives. However, studies provided by the Applicant demonstrate that it is economically infeasible.

The Initial Renovation Cost Analysis submitted to the record on April 20, 2023, by the Applicant (and identified above) considered the economic feasibility of Alternative 3. As with Alternative 2, CBRE prepared a pro forma valuation based on Alternative 3 of the Draft EIR (the "Partial Preservation with New Construction Alternative") which would involve renovation and preservation of approximately 70 percent of the existing Building and construction of additional commercial space on the remaining portion of the Project Site. Alternative 3 would involve demolition of the building volume behind the south façade of the north wing to accommodate the construction of an additional 10,815 square feet of commercial space (three stories high). In total, Alternative 3 would include approximately 19,771 square feet of office and retail uses. Alternative 3 results in the most leasable space in the renovated building of the alternatives identified.

Alternative 3 includes seismic retrofitting, ADA upgrades, Building Code compliance, and energy efficiency upgrades. As provided by the Applicant, Hill International prepared an analysis of the cost of completing this work as of November 2022. (See Attachment F to the Initial Renovation Cost Analysis.) CRBE considered the cost estimate prepared by Hill International and determined that the total cost of renovations, demolition, and construction of the additional annex was estimated at $19,646,307 as of March 2023. (See Attachment G to the Initial Renovation Cost Analysis.)

CBRE's 2023 analysis of the assumptions of Alternative 3, estimated the annual gross rental income for the retrofitted Barry Building at approximately $1,049,100, and the total value of the property at completion is $15,912,339. (See Attachment G to the Initial Renovation Cost Analysis.)

CBRE's 2023 analysis determined that to preserve the Barry Building per Alternative 3, the residual land value is $15,912,339 minus $19,646,307, or negative $3,733,908. (See Initial Renovation Cost Analysis.) CBRE found that this proposed project alternative returns a negative valuation. That is, CBRE calculated that the total costs of the necessary renovations and preparing the Barry Building per Alternative 3 for lease are estimated to be greater than the value of the renovated property. Although Alternative 3 offers the highest possible revenue for the preserved Barry Building by expanding leasable space of the Alternatives, CBRE's cost analysis found total costs of the necessary renovations and retrofitting to prepare the Barry Building for lease pursuant to Alternative 3 are greater than the value of the renovated property.

CBRE's 2023 analysis did not consider the potential availability of a 20 percent tax credit for the rehabilitation work[3] or the narrower scope of work available under the 75% Seismic Retrofit Scenario per the Historic Building Code,[4] which would call for 8,956 square feet of the building to be preserved under this Alternative. However, since CBRE prepared their analysis, Hill International identified that construction costs have risen significantly. According to Hill International's analysis, this escalation is primarily driven by higher labor costs, increased material prices, and rising transportation and disposal fees. (See Attachment H to the Additional Cost Analysis.) Hill International's June 2024 report notes that construction costs have risen by approximately 42.5 percent since their initial report was produced. In November, Hill International noted that construction costs have continued to rise. (See Attachment H to the Additional Cost Analysis; see also Updated Cost Analysis.) The Applicant determined that while these factors considered cumulatively would decrease the costs associated with construction under this Alternative by approximately $500,000, the reduction in costs available from the tax credit and the Historic Building Code were not sufficient to offset the negative $3,733,908 valuation identified by CBRE in 2023 in light of the significant increase in construction costs

CBRE and Hill International's analyses found that even with the additional commercial space included in Alternative 3, the sale price per square foot (approximately $630) is less than the cost per square foot of the necessary construction work ($970-$1,270 per Hill International's 2024 report) such that the additional construction required under Alternative 3 would not alter CBRE's finding of a negative valuation of the renovated property.

Alternative 3 would meet the Project objectives, avoid the Project's significant and unavoidable impacts to Cultural Resources and Land Use, while resulting in greater than the Project but still less than significant impacts with respect to air quality, greenhouse gas emissions, noise, and traffic. Feasibility is defined by PRC Section 15364 as "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors." Based on substantial evidence in the administrative record submitted by the Applicant, Alternative 3 would be economically infeasible.

Reference

See Draft EIR Section V for complete analysis of alternatives evaluated for the Project. See Appendices H-2, H-3, H-8, H-9, H-10, H-11 and G; Letter from E. Casey to J. Harris, RE: *11973 San Vicente Boulevard Prcject / ENV-2019-6645-EIR / State Clearinghouse No. 2020110210*

[3] This 20% tax credit under I.R.C. Treasury Regulations is discussed and considered in CBRE's 2024 analysis. (See Attachment I to the Additional Cost Analysis.)

[4] See also findings for Alternative 2 concerning the 75% Seismic Retrofit allowed under the Historic Building Code.

(April 20, 2023) and attachments; and Letter from E. Casey to K. Bernstein (July 15, 2024) ("Additional Cost Analysis") and attachments.

Alternative 4 – Relocation Alternative

Description of Alternative

Alternative 4 involves the dismantling of the Barry Building into multiple small building portions to facilitate its relocation to a new site, which has yet to be determined. At the new location, the Barry Building would be reconstructed, which would incorporate additional preservation measures relating to seismic retrofitting, ADA updates, building code updates, and energy efficiency upgrading that were described previously for Alternative 2. Once the Barry Building has been moved and rehabilitated, this analysis assumes that the Barry Building would be occupied by 12,800 square feet of retail uses.

HKA prepared a report analyzing four options to move the existing building to another site (see Appendix H-12 of the Draft EIR for this report), which are described below:

Option 1: Relocate virtually all building elements intact in one piece. This option was determined to be infeasible from a structural moving perspective, as the logistical challenges are extremely high. Besides undercutting beneath the building and then supporting the entire building while on the Project Site, it is infeasible to move the intact building in one piece once it is on City streets because of its size, particularly the building's width. Maneuverability would be infeasible to make turns from one street to another and due to the physical challenges (street trees, traffic signals, overhead wires, etc.) that would be encountered during the move. Therefore, HKA determined that Option 1 is infeasible due to these logistical challenges.

Option 2: This option considers partially dismantling the building elements into six parts at strategic vertical locations resulting in multiple two-story building portions which would be moved individually. This option proposes separating the north and the south two-story building elements from the connecting west and east two-story elements. This option also suggests removing, cataloging, and crating exterior stair elements, applied architectural features, such as aluminum sun-control fins, and applied architectural fixed-in-place wooden sun-control and ornamental architectural features. However, this option would present a number of transportation challenges. Even partially dismantled, the length of the building segments would make the transporting maneuverability infeasible at turns from one street to another street along the path from San Vicente Boulevard to a presently undetermined property. The overall height would also make this option infeasible for the same reasons as described for Option 1 (inability to clear street landscaping, utilities, street lighting, and traffic signals). Therefore, HKA determined that Option 2 is infeasible due to these logistical challenges.

Option 3: This option proposes partially dismantling the building elements at strategic horizontal locations into nine total pieces, thereby achieving multiple one-story building portions. In addition, strategic vertical separations would also be necessary to keep the overall length for each building element respectful to the architectural massing. Since the structure would be separated at a point above the second-floor plane but below the historic windows, the structure must be stabilized temporarily (addition of wood and steel beams, vertical and diagonal braces, diaphragms, and temporary floor construction to take place of the floor which will remain as part of the first story) to protect the construction from excessive movement during the relocation trip. This option also entails removing, cataloging, and crating exterior stair elements, applied architectural features, such as aluminum sun-control fins, and applied architectural fixed-in-place wooden sun-control

and ornamental architectural features. This option also presents a number of transportation moving challenges, as the overall length of the building elements would remain a challenge, which would make the transporting maneuverability difficult at turns from one street to another street along the path from San Vicente Boulevard to a presently undetermined property. The overall height may be less of a challenge with respect to clearance of street landscaping, utilities, street lighting, and traffic signals since the singular floor height would be substantially less than the building's two-story height. The work required under Option 3 would be performed over approximately 14-18 months. HKA identified that this option presents significant architectural destruction and damage when separating the building into portions for moving. Separating the two-story building would cause damage to the architectural exterior veneer plaster at the horizontal and vertical separations. As the overall building is separated into strategic portions to facilitate structural relocation, more and more damage and restoration will be required. HKA noted that restoring the veneer plaster at the separation locations would require feathering the plaster between the old and the new and/or installing screeds as plaster stops and expansion joints. This would result in significant degradation to the historic fabric of the building's exterior and to the character defining features.

Option 4: This portion proposes partially dismantling the building elements at strategic horizontal and vertical locations into 20 pieces achieving multiple small building portions. This option also entails removing, cataloging, and crating exterior stair elements, applied architectural features, such as aluminum sun-control fins, and applied architectural fixed-in-place wooden sun-control and ornamental architectural features. This option presents fewer transportation moving challenges and would make the transporting maneuverability somewhat easier at turns from one street to another street along the path from San Vicente Boulevard to a presently undetermined property. The overall height would likely be less of a challenge, for clearance of street landscaping, utilities, street lighting, traffic signals, and overhead power/telephone/cable lines since the singular floor height would be substantially less than an option where the building remains at two stories during the relocation. This option presents a temporary construction challenge (addition of wood and steel beams, vertical and diagonal braces, diaphragms, and temporary floor construction to take place of the floor which will remain as part of the first story) as previously discussed for Option 3, but this challenge is much more significant for Option 4, as a substantial amount of structure must be added to stabilize portions of the building temporarily to protect the building from excessive movement during the relocation trip. The work required under Option 4 would be performed over approximately 16-20 months.

As Options 1 and 2 were determined to be infeasible, the Draft EIR (Section V) addresses only Options 3 and 4 from the HKA report in detail. This analysis assumes that asbestos abatement activities, which would take place prior to all other work, are anticipated to last two weeks. Following this, preparing the Barry Building for dismantling and transporting would involve removing exterior elements and other ornamental features, as well as adding temporary stabilizing structures to portions of the building that would be transported. This is estimated to take approximately two months.

Reconstruction of the building would incorporate additional preservation measures relating to seismic retrofitting, ADA updates, building code updates, and energy efficiency upgrading. The differences between Option 3 and Option 4 chiefly concern whether the Barry Building would be dismantled into 9 or 20 pieces.

Reassembling the Barry Building and performing the additional preservation measures is estimated to take approximately 15 months. While a relocation site has not yet been identified, according to Historic Resources Group (see Appendix H-13 of the Draft EIR), the new site would have to be located on a similar commercial thoroughfare and have a similar flat topography as the Project Site. However, there is no limit to the distance from the old site to the new site within the City of Los Angeles, other than those limits imposed by physical and economic feasibility.

Impact Summary

All of Alternative 4's impacts would be less than significant, including with respect to historical resources (with mitigation) and land use. The Project would result in significant and unavoidable impacts with respect to historical resources and land use, as the Project would demolish the existing building, which is City HCM No. 887. As Alternative 4 involves the relocation of the existing building, Alternative 4 would avoid the Project's significant and unavoidable impacts with respect to historical resources and land use, with implementation of Mitigation Measure ALT4 MM-1 with respect to historical resources, as well as inclusion of the recommendations provided by Historic Resources Group (Appendix H-7 of the Draft EIR).

ALT4 MM-1 Potential mitigation measures to reduce the risks associated with disassembly of the Barry Building could include, but not necessarily be limited to, the following:

- Historic American Buildings Survey (HABS) documentation including photographs, drawings, and narrative, completed prior to the issuance of permits.
- Preparation of an Historic Structure Report (HSR) in conformance with Preservation Brief 43 prior to the issuance of permits, to document existing features, evaluate conditions, and recommend appropriate treatments.
- Preparation of a Relocation and Rehabilitation Plan, to be reviewed and approved by the City of Los Angeles Office of Historic Resources (OHR) prior to the issuance of any permits.
- Selection of a new site that meets the requirements of Criteria Consideration B as outlined in National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation.
- Inclusion of an historic architect on the Project team to monitor disassembly, relocation, and rehabilitation activities.
- Rehabilitation of the relocated Barry Building in conformance with the Secretary of the Interior's Standards for Rehabilitation (36 CFR 67) including replication of the historic cement plaster and reinstallation of salvaged architectural features.

However, Alternative 4 would be required to implement mitigation measures (Mitigation Measures ALT4 MM-2 through ALT4 MM-5) related to construction noise and vibration to ensure that that these impacts are less than significant at both the Project Site and the potential relocation site.

ALT4 MM-2 Sound barriers rated to achieve a sound attenuation of at least 15 dBA shall be erected along the following boundaries:

- The east and west parking area boundaries (both the Project Site's east and west parking area boundaries and the east and west boundaries of the parcel immediately to the north of the Project Site (APN 4404-025-016)). (While the parcel to the north of the Project Site is not part of either the Project or Alternative 4, that parcel would be used for construction staging.)
- The northern property line of the parcel to the north of the Project Site (APN 4404-025-016) that separates this parcel from the residential uses to the north. Sound barriers along this property line shall be connected to the sound barriers described

for the east and west property lines, so that all of Alternative 4's construction staging areas are fully enclosed by sound barriers.

The sound barriers shall be tall enough to shield line of sight paths from operating construction equipment to the 2nd stories of nearby residential uses. The prescribed sound barriers shall be installed for the duration of Alternative 4's relocation preparation and utilities removal phases.

ALT4 MM-3 Sound barriers rated to achieve a sound attenuation of at least 15 dBA shall be erected along perimeters of the future relocation site facing noise-sensitive receptors that are located less than 300 feet from the future relocation site. The sound barriers shall be tall enough to shield line of sight paths from operating construction equipment to any above-ground stories that these receptors may possess. The sound barriers shall be installed for the duration of Alternative 4's relocation preparation activities (including trenching for utility connections and grading for foundations), Barry Building reassembly and preservation activities, and any paving.

ALT4 MM-4 The Barry Building shall not be relocated to a future site that would require heavy-duty, steel-tracked construction equipment (or the vibrational equivalent thereof) to operate within 15 feet of structures that meet FTA Category III conditions or within 20 feet of structures that meet FTA Category IV conditions.

ALT4 MM-5 The Barry Building shall not be relocated to a future site that would require heavy-duty, steel-tracked construction equipment (or the vibrational equivalent thereof) to operate within 85 feet of residential land uses.

Finally, as Alternative 4 involves an operational component (the re-occupancy of the relocated Barry Building), Alternative 4 would result in greater impacts than the Project with respect to air quality, greenhouse gas emissions, noise, and traffic, although these impacts would still be less than significant.

Finding

Specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the environmental impact report. (PRC 21081(a)(3).)

Rationale for Finding

Within Alternative 4, four different options for relocation were identified by HKA Global Inc. (See Attachment H-12 to the Draft EIR.) Options 1 and 2 are technically infeasible. Options 3 and 4 are economically infeasible and are still likely to result in significant damage to the historical character of the Barry Building. All four options would require a relocation site, which has not been identified and may not be available. (See Attachment H-13 to the Draft EIR.)

The ability of Alternative 4 to meet the Project objectives depends on finding a new site for the Barry Building, which has not occurred, and the EIR could not include an analysis as to the feasibility of finding a new site without engaging in speculation.[5] However, assuming a new site

[5] As noted in Appendix h-13 to the Draft EIR, the new site would have to be located within the Los Angeles city limits, be located on a similar commercial thoroughfare and have a similar flat topography.

could be identified, the analysis provided in the EIR demonstrates that Alternative 4 may be able to meet both of the Project objectives, subject to economic factors, which were not addressed in the EIR.

HKA Global, Inc. provided an analysis to evaluate, and report on the feasibility of Alternative 4 of relocating the existing Barry Building to an off-site location while respecting and maintaining the historical "character defining features" of the building and its siting features. (See Appendix H-12 to the Draft EIR.) Options 1 and 2 as explained above were determined to be categorically infeasible due to street loading capacities and width limitations and maneuvering challenges (turning from one street to another).

Option 3 proposes partially dismantling the building elements at strategic horizontal locations into 9 total pieces. As noted in HKA's report, Option 3 presents significant logistical challenges, and also presents high risks to the historical character of the Barry Building. HKA determined that this option, while technically possible, would likely damage and destroy character defining features which will be difficult to restore, eliminating the benefit of preserving the historic characteristics of the building through relocation.

Option 4 would dismantle the building into 20 segments. While this option is technically feasible, HKA determined that it would be costly, and that the risks associated with the relocation and reassembly are high. This option presents the greatest risk to architectural and historical feature integrity of the building and the building's character defining features making this option least undesirable historical risk option if the desired effect is to protect the architectural integrity of the building.

Neither Option 3 or 4 is a practical option to meet the project's first objective, as both options would destroy character defining features and would present very high risks to the integrity of the building that could result in a significant adverse impact as defined by CEQA. (See Appendix H-12 and H-16.) However, even if the adverse impacts could be mitigated to a less than significant impact as outlined by HRG in Appendix H-16 to the Draft EIR, and assuming a suitable new site exists and can be obtained, Options 3 and 4 are economically infeasible. Feasibility is defined by PRC Section 15364 as "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors." As explained in Alternative 2, the cost to complete the necessary ADA upgrades and seismic retrofits such that the building and safely be occupied for use exceeds the value of the preserved building by approximately $5,663,653.[6] In this Alternative, the considerable additional cost for the relocation would mean the costs associated with relocation are likely much higher than Alternative 2, whereas the value of the preserved building (based on total leasable square footage) is unlikely to change significantly at its new location.

Reference

See Draft EIR Section V for complete analysis of alternatives evaluated for the Project. See Appendices H-12, H-13, H-14, H-15, and H-16 for additional supporting documentation.

The building would have to be able to be located in the same general orientation to the street, facing generally south, with similar setbacks, hardscape and landscape.

[6] If the necessary ADA upgrades and seismic retrofitting are forgone, the relocated building could not be occupied and this Alternative would not meet the second project objective.

Alternatives Rejected as Infeasible

As set forth in CEQA Guidelines Section 15126.6(c), an EIR should identify any alternatives that were considered for analysis but rejected as infeasible and no further analysis is provided in the EIR. For those rejected alternatives, the EIR should briefly explain the reasons for their rejection. According to the CEQA Guidelines, among the factors that may be used to eliminate an alternative from detailed consideration are the alternative's failure to meet most of the basic project objectives, the alternative's infeasibility, or the alternative's inability to avoid significant environmental impacts. Alternatives to the Project that were considered and rejected as infeasible include the following:

One alternative that was considered was mothballing the Barry Building in accordance with *Preservation Brief 31: Mothballing Historic Buildings,* prepared by the National Park Service. Preservation Brief 31 outlines the steps required to close up and temporarily protect an historic building for an extended period of time while planning its future use. Historic Resources Group prepared a memo that outlines the steps to properly mothball a building (see Appendix H-1 of the Draft EIR). However, mothballing is not a long-term solution that can achieve the project objectives, including compliance with the Soft Story Ordinance and therefore, this alternative was rejected.

Environmentally Superior Alternative

Section 15126.6(e)(2) of the CEQA Guidelines indicates that an analysis of alternatives to a project shall identify an Environmentally Superior Alternative among the alternatives evaluated in an EIR. The CEQA Guidelines also state that should it be determined that the No Project Alternative is the Environmentally Superior Alternative, the EIR shall identify another Environmentally Superior Alternative among the remaining alternatives. Pursuant to Section 15126.6(c) of the CEQA Guidelines, the analysis below addresses the ability of the alternatives to "avoid or substantially lessen one or more of the significant effects" of the Project.

Alternative 1 (the No Project Alternative) would be environmentally superior to the Project since this alternative would avoid the Project's significant and unavoidable impacts with respect to historical resources and land use. In addition, Alternative 1 would not include an operational component and, therefore, would not result in any operational impacts.

Among the remaining alternatives, Alternative 2 (the Preservation Alternative) is environmentally superior to Alternatives 3 and 4. As noted above, Alternative 2 would involve the work to comply with the City's Soft Story Ordinance, as well as a voluntary seismic retrofit and additional upgrades (like ADA compliance) in order to make the existing building suitable for occupancy. This Alternative would lessen the significant and unavoidable impacts to historic resources and land use/planning compared to the Project as it would not require demolition of the Barry Building. However, Alternative 2 would result in greater construction and operational impacts compared the Project.

Alternatives 2, 3, and 4 would all reduce the significant and unavoidable impacts to historic resources and land use/planning that would occur under the Project to less than significant levels. When compared to Alternative 2, Alternative 3 consists of more development and as such, would result in more impacts than Alternative 2.

Comparing Alternative 2 and Alternative 4, Alternative 4 would result in greater impacts with respect to the character-defining features of the Barry Building, and would therefore require the implementation of additional mitigation measures to avoid a significant impact with respect to historical resources. Alternative 4 would have greater impacts than Alternative 2.

Therefore, Alternative 2 is the Environmentally Superior Alternative.

However, the determination of the "environmentally superior" alternative does not include an evaluation of the feasibility of the environmentally superior alternative.

IX. Significant Irreversible Environmental Changes

Section 15126.2(d) of the CEQA Guidelines indicates that an EIR should evaluate any significant irreversible environmental changes that would occur should the proposed project be implemented. The types and level of development associated with the project would consume limited, slowly renewable, and non-renewable resources. This consumption would occur during construction of the project and would continue throughout its operational lifetime. The development of the Project would require a commitment of resources that would include: (1) building materials and associated solid waste disposal effects on landfills; (2) water; and (3) energy resources (e.g., fossil fuels) for electricity, natural gas, and transportation. The Project Site contains no energy resources that would be precluded from future use through Project implementation. For the reasons set forth in Section VI.3, of the Draft EIR, the project's irreversible changes to the environment related to the consumption of nonrenewable resources would not be significant, and the limited use of nonrenewable resources is justified.

The Project would necessarily consume a limited amount of slowly renewable and non-renewable resources that could result in irreversible environmental changes, including: (1) solid waste disposal effects on landfills; (2) water; and (3) energy resources. As explained in Section VI.3 of the Draft EIR, the Project would not consume a large commitment of natural resources or result in significant irreversible environmental changes.

Building Materials and Solid Waste

Solid waste was addressed in the Initial Study (included in Appendix A-1 of the Draft EIR). As discussed therein, the Project would demolish of the existing commercial building, which is expected to generate a total of approximately 4,174 cubic yards of debris, including 130 cubic yards of asbestos-containing material and 4,044 cubic yards of non-contaminated debris. The 130 cubic yards of asbestos-containing material would be entirely disposed of at the Azusa Land Reclamation Facility. Compliance with SB 1374 would require the recycling or salvaging of 75 percent of the remaining 4,044 cubic yards of debris. This would equate to approximately 1,011 cubic yards (or 404,400 pounds or 202 tons) that would be disposed of at a landfill over the course of demolition. The Initial Study determined that the landfills serving the Project Site would have adequate capacity to accommodate the solid waste generated by the demolition of the existing building. Because of the recycling of most of the solid waste generated by the Project, and the available capacity at landfills serving the Project Site, the Project's short-term solid waste disposal effects on landfills would be reduced.

Water

As stated in the Initial Study (included in Appendix A-1 of the Draft EIR), the Project would require a limited amount of water for dust control during demolition activities and to water the landscape

buffer planted along the fence after demolition has been completed. As discussed in the Initial Study, LADWP would be able to supply water for the Project's demolition activities and to water the landscape buffer based on its existing supply. Thus, while the Project would result in a limited amount of irreversible consumption of water, the Project would not result in a significant impact related to water supply.

Energy Consumption and Air Quality

The proposed construction activities would consume relatively minor quantities of electricity (i.e., temporary use for lighting and small power tools). This electricity would be supplied to the Project Site by the City of Los Angeles Department of Water and Power (LADWP) and would be obtained from the existing electrical lines that connect to the Project Site. Electricity consumed during demolition of the existing building and installation of the landscape buffer would be temporary and would cease upon the completion. Construction activities would also consume energy in the form of petroleum-based fuels associated with the use of construction vehicles, construction worker travel to and from the Project Site, and hauling truck trips. Based on the limited amount of equipment required and the limited duration of construction activities, the Project would require a negligible fraction of the State's total transportation fuel consumption. Therefore, the Project would not have an adverse impact on available electricity or fuel supplies.

The Project consists solely of the demolition of the existing building and the installation of a landscape buffer on the southern boundary of the Project Site. Development of the Project Site is not proposed and/or considered as part of the Project. Therefore, the Project would not have an operational demand for energy, with the exception of a limited amount of electricity for sprinklers to water the landscape buffer.

Overall, the Project would not result in the wasteful, inefficient, and unnecessary consumption of energy resources, and Project impacts would be less than significant.

Conclusion

Based on the above, the Project would require the irreversible commitment of limited, slowly renewable, and non-renewable resources, which would limit the availability of these resources for future generations or for other uses. However, the consumption of such resources would not be considered substantial. The loss of such resources would not be highly accelerated when compared to existing conditions and such resources would not be used in a wasteful manner. Therefore, although irreversible environmental changes would result from the Project, such changes are concluded to be less than significant, and the limited use of nonrenewable resources that would be required by the Project's construction activities is justified.

X. Growth-Inducing Impacts

Section 15126.2(e) of the CEQA Guidelines requires a discussion of the ways in which a proposed project could induce growth. This includes ways in which a project would foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Included in this are projects which would remove obstacles to population growth, or increases in the population which may tax existing community service facilities, requiring construction of new facilities that could cause significant environmental effects. Additionally, consideration must be given to characteristics of some projects which may encourage and facilitate other activities that could significantly affect the environment, either

individually or cumulatively. It must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment.

The Project consists of the demolition of the Barry Building. Once demolition is complete, the portion of the Project Site that currently contains the Barry Building would be a vacant lot, and the existing surface parking lot would remain. A landscape buffer would be installed along the southern boundary of the Project Site (fronting San Vicente Boulevard). Development of the Project Site is not proposed and/or considered as part of the Project. The demolition activities would require a daily maximum of 10 construction workers during any given day. The patterns of construction workers in Southern California are such that it is not likely that the workers for the Project would relocate their households as a consequence of being employed to conduct the Project's demolition work, especially given the short duration of demolition activities. Therefore, the Project would not be considered growth-inducing from a short-term employment perspective. Rather, the Project would provide a public benefit by providing employment opportunities during the demolition period.

As the Project does not include any new development on the Project Site, the Project would not result in a population increase at the Project Site due to new housing or employment opportunities that could result in substantial unplanned growth either directly or indirectly. Likewise, the Project also would not require any utility infrastructure improvements. Therefore, the Project would not result in any direct or indirect growth-inducing impacts.

XI. Energy Conservation

The Project's demolition activities would consume relatively minor quantities of electricity and fuel, particularly as the Project would be temporary. Electricity consumed during demolition of the existing building and installation of the landscape buffer would be temporary and would cease upon the completion. All construction and demolition equipment would meet applicable fuel efficiency standards.

The Project does not have an operational component and therefore would not have an operational demand for energy, with the exception of a limited amount of electricity for sprinklers to water the landscape buffer. The Project would not result in the wasteful, inefficient, and unnecessary consumption of energy resources.

XII. Statement of Overriding Considerations

The EIR identifies unavoidable significant impacts that would result from implementation of the Project. PRC Section 21081 and CEQA Guidelines Section 15093(b) provide that when a decision of a public agency allows the occurrence of significant impacts that are identified in the EIR, but are not at least substantially mitigated to an insignificant level or eliminated, the lead agency must state in writing the reasons to support its action based on the EIR and/or other information in the record. The State CEQA Guidelines require, pursuant to CEQA Guidelines Section 15093(b), that the decision-maker adopt a Statement of Overriding Considerations at the time of approval of a project if it finds that significant adverse environmental effects have been identified in the EIR that cannot be substantially mitigated to an insignificant level or be eliminated. These findings and the Statement of Overriding Considerations are based on the documents and materials that constitute the record of proceedings, including, but not limited to, the Final EIR and all technical appendices attached thereto.

Based on the analysis in Sections IV.B and IV.D of the Environmental Impact Analysis, of the Draft EIR, implementation of the Project would result in significant impacts to cultural resources (historical resources) and land use and planning (conflict with plans) that cannot be feasibly mitigated attributable to the demolition of an HCM.

Accordingly, the City adopts the following Statement of Overriding Considerations. The City recognizes that significant and unavoidable impacts would result from implementation of the project. Having (i) adopted all feasible mitigation measures, (ii) rejected as infeasible the alternatives to the project discussed above, (iii) recognized all significant, unavoidable impacts, and (iv) balanced the benefits of the project against the project's significant and unavoidable impacts, the City hereby finds that each of the project's benefits listed below outweigh and override the significant unavoidable impacts relating to the demolition of an HCM.

The below stated reasons summarize the benefits, goals and objectives of the Project, and provide the detailed rationale for the benefits of the Project. These overriding considerations of economic, social, aesthetic, and environmental benefits for the Project justify adoption of the Project and certification of the completed EIR. Each of the listed project benefits set forth in this Statement of Overriding Considerations provides a separate and independent ground for the City's decision to approve the project despite the project's identified significant and unavoidable environmental impacts. Each of the following overriding considerations separately and independently (i) outweighs the adverse environmental impacts of the Project, and (ii) justifies adoption of the Project and certification of the completed EIR. In particular, achieving the underlying purpose for the Project would be sufficient to override the significant environmental impacts of the Project.

1. The Project would remove an existing safety hazard and seismically unsafe structure, which includes significantly seismically overstressed building portions, in compliance with the Soft Story Ordinance, and objectives to protect public safety or possible occupants in the event of a moderate to severe earthquake;
2. The Project would remove an attractive nuisance, namely a building known to be vacant, that may give rise to break-ins and other unlawful behavior, and which could pose safety and other risks to the surrounding community and adjacent properties for unlawful behavior within a structurally unsound building;
3. The Project would pursue an economically feasible improvement to the property in a manner that will also benefit the surrounding community by removing public safety risks and health hazards;
4. The Project would create an additional vacant site that could accommodate housing or other commercially viable development in the future, built to more energy-efficient and structurally safer modern building codes, contributing to the City's Regional Housing Needs Assessment (RHNA) allocations and the City's critical housing need, or providing new commercial uses in line with smart growth policies and transit-oriented development; and
5. The Project would create jobs during demolition for construction workers in the City.

General Findings.

1. The City finds that the EIR was prepared in compliance with CEQA and the CEQA Guidelines. The City finds that it has independently reviewed and analyzed the EIR for the project, that the Draft EIR which was circulated for public review reflected its independent judgment and that the Final EIR reflects the independent judgment of the City.

2. The EIR evaluated the following potential project and cumulative environmental impacts: air quality, cultural resources, greenhouse gas emissions, land use and planning, noise, transportation and traffic, and tribal cultural resources, alternatives, and other CEQA considerations. Additionally, the EIR considered, in separate sections, Significant Irreversible Environmental Changes and Growth Inducing Impacts. The significant environmental impacts of the project and the alternatives were identified in the EIR.

3. The City finds that the EIR provides objective information to assist the decision makers and the public at large in their consideration of the environmental consequences of the project. The public review periods provided all interested jurisdictions, agencies, private organizations, and individuals the opportunity to submit comments regarding the Draft EIR. The Final EIR was prepared after the review periods and responds to comments made during the public review periods.

4. The City evaluated comments on environmental issues received from persons who reviewed the Draft EIR. In accordance with CEQA, the City prepared written responses describing the disposition of significant environmental issues raised. The Final EIR provides adequate, good faith and reasoned responses to the comments. The City reviewed the comments received and responses thereto and has determined that neither the comments received nor the responses to such comments add significant new information regarding environmental impacts to the Draft EIR. The Lead Agency has based its actions on full appraisal of all viewpoints, including all comments received up to the date of adoption of these findings, concerning the environmental impacts identified and analyzed in the EIR.

5. The Final EIR documents changes to the Draft EIR. Having reviewed the information contained in the Draft EIR, the Final EIR, and the administrative record, as well as the requirements of CEQA and the CEQA Guidelines regarding recirculation of Draft EIRs, the City finds that there is no new significant impact, substantial increase in the severity of a previously disclosed impact, significant new information in the record of proceedings or other criteria under CEQA that would require additional recirculation of the Draft EIR, or that would require preparation of a supplemental or subsequent EIR. Specifically, the City finds that:

    - The Responses to Comments contained in the Final EIR fully considered and responded to comments claiming that the project would have significant impacts or more severe impacts not disclosed in the Draft EIR and include substantial evidence that none of these comments provided substantial evidence that the project would result in changed circumstances, significant new information, considerably different mitigation measures, or new or more severe significant impacts than were discussed in the Draft EIR.

    - The City has thoroughly reviewed the public comments received regarding the project and the Final EIR as it relates to the project to determine whether under the requirements of CEQA, any of the public comments provide substantial evidence that would require recirculation of the EIR prior to its adoption and has determined that recirculation of the EIR is not required.

    - None of the information submitted after publication of the Final EIR, including testimony at the public hearings on the project, constitutes significant new

information or otherwise requires preparation of a supplemental or subsequent EIR. The City does not find this information and testimony to be credible evidence of a significant impact, a substantial increase in the severity of an impact disclosed in the Final EIR, or a feasible mitigation measure or alternative not included in the Final EIR.

- The mitigation measures identified for the project were included in the Draft EIR and Final EIR. The final mitigation measures for the project are described in the Mitigation Monitoring Program (MMP). Each of the mitigation measures identified in the MMP is incorporated into the project. The City finds that the impacts of the project have been mitigated to the extent feasible by the mitigation measures identified in the MMP.

6. CEQA requires the Lead Agency approving a project to adopt a MMP or the changes to the project which it has adopted or made a condition of project approval in order to ensure compliance with the mitigation measures during project implementation. The mitigation measures included in the EIR as certified by the City and revised in the MMP as adopted by the City serve that function. The MMP includes all of the mitigation measures and project design features adopted by the City in connection with the approval of the project and has been designed to ensure compliance with such measures during implementation of the project. In accordance with CEQA, the MMP provides the means to ensure that the mitigation measures are fully enforceable. In accordance with the requirements of Public Resources Code Section 21081.6, the City hereby adopts the MMP.

7. The custodian of the documents or other materials which constitute the record of proceedings upon which the City decision is based is the City of Los Angeles, Department of City Planning.

8. The City finds and declares that substantial evidence for each and every finding made herein is contained in the EIR, which is incorporated herein by this reference, or is in the record of proceedings in the matter.

9. The City is certifying an EIR for, and is approving and adopting findings for, the entirety of the actions described in these Findings and in the EIR as comprising the project.

10. The EIR is a project EIR for purposes of environmental analysis of the project. A project EIR examines the environmental effects of a specific project. The EIR serves as the primary environmental compliance document for entitlement decisions regarding the project by the City and the other regulatory jurisdictions.

INFORMATION BULLETIN / PUBLIC – BUILDING CODE
REFERENCE NO.: Effective: 01-01-2023
DOCUMENT NO.: P/BC 2023-149 Revised:
Previously Issued As: P/BC 2020-149

PROCEDURE FOR PROCESSING "ERROR OR ABUSE OF DISCRETION" APPEALS OF LADBS ACTIONS TO THE BOARD OF BUILDING AND SAFETY COMMISSIONERS

This Information Bulletin provides the procedure for processing requests for Modification of Building Ordinances (Request for Modification) and, subsequently, appeals alleging error or abuse of discretion by the Los Angeles Department of Building and Safety ("LADBS") concerning the City of Los Angeles Building Code (LABC) or other items within the powers of the Board of Building and Safety Commissioners (BBSC) as granted by LAMC 98.0403.1(b). Such appeals shall be filed in accordance with procedures outlined in LAMC Section 98.0403.2.

LADBS staff uses the following guidelines to process appeals filed under LAMC 98.0403.2:

1. PROCESSING FEES

The customer shall complete the Request for Modification Form and provide the request to the LADBS staff member along with exhibits and any pertinent information for the request. The LADBS staff member's supervisor will determine the processing fees pursuant to LAMC Section 98.0403.2(a) and refer the customer to cashier with (3) copies. Processing fees are $130.00 for the first item and $39.00 for each additional item, plus $208.00 for two (2) hours of research. For complex requests requiring more than two (2) hours of research, an additional research fee may be imposed.

Note: At satellite offices where cashiers are not available, the appellant may leave a check or money order made out to the "City of Los Angeles" for the appropriate amount. LADBS shall process the application and send a copy with receipt of payment to the appellant.

2. DETERMINATION

The LADBS Staff member's supervisor shall make a determination to grant, grant with conditions, or deny the Request for Modification and provide said information to the customer. If dissatisfied with the supervisor's interpretation, the customer can file an appeal under LAMC Section 98.0403.2(b).

LAMC Section 98.0403.2(b). appeals shall be submitted to the Chief Inspector, Building Civil Engineer and above in charge of the office where the determination was made. (The term "Manager" shall be used hereinafter to describe this senior staff position.)

If the Manager determines that LADBS neither erred nor abused its discretion in making the determination, and the appellant wishes formally to initiate the appeal process, the Manager shall provide the required "Supplemental Application for Appeals" Form (Appeal Form) and

As a covered entity under Title II of the Americans with Disabilities Act, the City of Los Angeles does not discriminate on the basis of disability and, upon request, will provide reasonable accommodation to ensure equal access to its programs, services and activities. For efficient handling of information internally and in the internet, conversion to this new format of code related and administrative information bulletins including MGD and RGA that were previously issued will allow flexibility and timely distribution of information to the public.

instruct the appellant how to complete the form.

The appellant must itemize the grounds for the appeal, along with applicable LAMC sections, on the Appeal Form. The Request for Modification Form and any evidence supporting the appeal, such as photographs and correspondence should be submitted as an attachment to the appeal form.

No additional information will be accepted by the Department after the appeal form has been submitted unless a new appeal form is filed and applicable fees are paid.

3. REVIEW OF APPEAL FORMS AND FEE FOR WRITTEN REPORT

The Manager shall review the appeal package for completeness. If the Manager determines that the form and all attachments clearly state the grounds for the appeal and cannot be approved administratively, the Manager shall complete the fees portion on page two of the Request for Modification form as outlined in LAMC Section 98.0403 (b) and refer the customer to cashiers with (3) copies. Filling fees are based on the subject of the request as set forth in Tables 4A or 4B plus $104.00 for (1) hour of research.

4. ROUTE ORIGINAL APPEAL PACKAGE

After the fees are paid, the appellant shall return the original appeal package and a copy of the paid request for modification form to the Manager. The Manager shall ensure that the appellant's original appeal package is hand delivered to the Commission Office. The Commission staff shall log the appeal by assigning a case number, creating a case file and assigning the case to the responsible manager.

5. WRITTEN DETERMINATION

The Manager assigned to the case shall prepare a report and presentation setting forth the justifications and findings for LADBS's determination, specifically addressing the appellant's issues. The report shall be completed within 60 days from the date of the appeal's submittal and the item shall be scheduled for the next available BBSC hearing date. For complex requests, additional time may be required to complete the report.

6. NOTIFICATION OF PUBLIC HEARING

When the appeal is scheduled for a hearing before the BBSC, the Commission staff shall notify the appellant through a written notice at least ten days prior to the date of the hearing. The notice shall be given by email or U.S. mail.

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REQUEST FOR MODIFICATION OF BUILDING ORDINANCES

UNDER AUTHORITY OF L.A.M.C. SECTION 98.0403

PERMIT APP. #:	**DATE:**	**For City Dept. Use Only** **Building Zoning** **Grading Shoring** **Mech. Elec. Plumb.** **Green D.A. Misc.**
JOB ADDRESS:		
Tract:	**Block:** **Lot:**	
Owner: Address: City State Zip Phone	Petitioner: Address: City State Zip Phone	

REQUEST (SUBMIT PLANS OR ADDITIONAL SHEETS AS NECESSARY) | CODE SECTIONS:

JUSTIFICATION (SUBMIT PLANS OR ADDITIONAL SHEETS AS NECESSARY)

Owner/Petitioner Name (Print) **(Signature)** **Position**

FOR CITY DEPARTMENT'S USE ONLY BELOW THIS LINE

Concurrences required from the following Department(s)			Approved	Denied
☐ Los Angeles Fire Department	Print Name_____	Sign_____	☐	☐
☐ Public Works Bureau of Engineering	Print Name_____	Sign_____	☐	☐
☐ Department of City Planning	Print Name_____	Sign_____	☐	☐
☐ Department of County Health	Print Name_____	Sign_____	☐	☐
☐ Other _____	Print Name_____	Sign_____	☐	☐

DEPARTMENT ACTION

☐ **GRANTED** ☐ **DENIED**

Reviewed by: (Staff) (Print) ***Sign*** ***Date***

Action taken by: (Supervisor) (Print) ***Sign*** ***Date***

NOTE: IN CASE OF DENIAL, SEE PAGE #2 OF THIS FORM FOR APPEAL PROCEDURES

CONDITIONS OF APPROVAL (Continued on Page 2):

For Cashiers Use Only

(PROCESS ONLY WHEN FEES ARE VERIFIED)

(DEPARTMENT USE ONLY)

FEES

Appeal Processing Fee.. (No. of Items) =	1	X $130 + $39/addl	= 130.00
Inspection Fee ..... (No of Insp.) =		X $ 84.00	=
Research Fee ... (Total Hours Worked) =	2	X $104.00	= 208.00
Subtotal			= 338.00
Development Services Center Surcharge		X .03	= 10.14
Systems Development Surcharge		X .06	= 20.28
Total Fees			= 368.42

Fees verified by:

Print and Sign _____

Permit App #:	Job Address:

CONDITIONS OF APPROVAL (Continued from Page 1)

CITY OF LOS ANGELES
BOARD OF BUILDING AND SAFETY/DISABLED ACCESS COMMISSION APPEAL FORM

(Must be Attached to the Modification Request Form, Page 1)

AFFIDAVIT – LADBS BOARD OF BUILDING AND SAFETY COMMISSIONERS – RESOLUTION NO. 832-93

I, _____ do state and swear as follows:
(Print or Type Name of the Person Signing this Form)

1. The name and mailing address of the owner of the property (as defined in the resolution 832-93) at _____ as shown on the appeal application (LADBS Com 31) are correct, and
2. The owner of the property as shown on the appeal application will be made aware of the appeal and will receive a copy of the appeal.

I declare under PENALTY OF PERJURY that the forgoing is true and correct.

Owner's Name(s) _____ _____
(Please Type or Print) (Please Type or Print)

Owner's Signature(s) _____ (Two Officers' Signatures Required for Corporations)
(Please Sign)

Name of Corporation _____ _____
(Please Print Name of Corporation) (Please Type or Print)

Dated this _____ day of _____ 20_____

CALIFORNIA ALL-PURPOSE ACKNOWLEDGEMENT----------SIGNATURE(S) MUST BE NOTARIZED

State of **CALIFORNIA** County of _____ on _____

before me, _____, personally appeared _____,
Name, Title of Officer (e.g. Jane Doe, Notary Public) Name(s) of Signer(s)

who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument in person(s), or the entity upon behalf of which the person(s) acted, executed the instrument. **I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing is true and correct.**

WITNESS my hand and official seal. Signature _____

As a covered entity under Title II of the Americans with Disabilities Act, the City of Los Angeles does not discriminate on the basis of disability and, upon request, will provide reasonable accommodation to ensure equal access to its programs, services and activities.

APPEAL OF DEPARTMENT ACTION TO THE BOARD OF BUILDING AND SAFETY COMMISSIONERS/DISABLED ACCESS APPEALS COMMISSION

_____ _____
Applicant's Name Applicant's Title

_____ _____
Signature Date

FEES **(DEPARTMENT USE ONLY)**

Board Fee ..... (No. of Items)	1	X $354 +$215/addl	=	354.00
Inspection Fee ..... (No of Insp.) =		X 84.00	=	0.00
Research Fee ... (Total Hours Worked) =	2	X 104.00	=	208.00
Subtotal			=	562.00
Development Services Center Surcharge		X .03	=	16.86
Systems Development Surcharge		X .06	=	33.72
Total Fees			=	612.58

Fees verified by:

Print and Sign _____

For Cashiers Use Only
(PROCESS ONLY WHEN FEES ARE VERIFIED)

SUPPLEMENTAL APPLICATION FOR APPEALS

TYPE OF APPEAL:

- ☐ BUILDING CODE APPEAL
- ☐ ZONING CODE APPEAL
- ☐ INSPECTION / CODE ENFORCEMENT APPEAL

PROJECT TYPE:

- ☐ ONE OR TWO FAMILY RESIDENTIAL
- ☐ MULTI-FAMILY RESIDENTIAL
- ☐ COMMERCIAL/INDUSTRIAL

PERMIT APPLICATION:		
ADDRESS:		ZIP:
TRACT:	BLK:	LOT:
OWNER NAME:	OWNER ADDRESS:	ZIP:

APPLICATION INFORMATION:

NAME:	ADDRESS:	ZIP:
EMAIL:	APPLICANT SIGNATURE:	DATE:

ISSUES:	VIOLATION:	CODE SECTION:
1.		
2.		
3.		

- ❖ FOR ADDITIONAL ISSUES, ATTACH TO THIS APPLICATION
- ❖ ATTACH ALL APPLICABLE EXHIBITS AND EVIDENCE TO THIS APPLICATION

SUPPLEMENTAL APPLICATION FOR APPEALS

ISSUES:	VIOLATION:	CODE SECTION:
4.		
5.		
6.		
7.		
8.		
9.		

EXHIBIT C1

FORM GEN. 160 (Rev. 6-80)

CITY OF LOS ANGELES
INTER-DEPARTMENTAL CORRESPONDENCE

DATE: March 21, 2024

TO: Osama Younan, General Manager
Frank Lara, Director
Department of Building and Safety

FROM: Milena Zasadzien
Principal City Planner
Department of City Planning

SUBJECT: **PROPOSED DEMOLITION OF BARRY BUILDING, 11973 SAN VICENTE BLVD**

In 2007, the Los Angeles City Council adopted the City of Los Angeles Cultural Heritage Commission's (CHC's) recommendation to designate the Barry Building, located at 11973-11975 San Vicente Boulevard (Project Site), as Historical-Cultural Monument (HCM) No. LA-887. In 2019, the property owner of the Barry Building applied for permits to demolish the building, with no further plans for development of the Project Site. The City of Los Angeles has codified two separate processes for consideration of the issuance of demolition permits for HCMs, such as the Barry Building. One of the processes is codified in Los Angeles Municipal Code (LAMC) Section 91.106.4.5 and is administered by the Los Angeles Department of Building and Safety (DBS) (DBS Process). The other process is codified in Los Angeles Administrative Code (LAAC) Sections 22.171.14 and 22.171.15 and involves the CHC and potentially the City Council (CHC Process). Both processes require compliance with the California Environmental Quality Act (CEQA). As the Barry Building has been designated as an HCM, it is considered a Historical Resource under CEQA Guidelines, Section 15064.5(a)(2). Demolition of a Historical Resource would cause an unavoidable substantial adverse change in the environment requiring preparation of an Environmental Impact Report (EIR). As such, an EIR has been prepared by the Department of City Planning (DCP), in accordance with CEQA, to serve as an informational document for public agency decision-makers and the general public regarding the objectives and environmental impacts of the demolition of the Barry Building. This memo serves to provide information to DBS related to the certification of the EIR.

PROJECT DESCRIPTION:

The 11973 San Vicente Boulevard Project (Project) consists of demolition of the existing two-story commercial building, commonly referred to as the Barry Building. The existing building is an HCM that has been vacant and fenced since 2017. Once demolition activities are complete, the portion of the Project Site that currently contains the Barry Building would be a vacant lot, and the existing surface parking lot would remain. A landscaped buffer would be installed along the southern boundary of the Project Site (fronting San Vicente Boulevard). No future development of the Project Site is proposed or considered as part of the Project.

ENVIRONMENTAL IMPACT REPORT:

The City of Los Angeles (City), as Lead Agency, has evaluated the environmental impacts of implementation of the Project by preparing an EIR (Case No. ENV-2019-6645-EIR/State Clearinghouse No. 2020110210). The EIR was prepared in compliance with the California Environmental Quality Act of 1970 (CEQA), Public Resources Code (PRC) Section 21000 et seq. and the California Code of Regulations Title 15, Chapter 6 (CEQA Guidelines).

CEQA Section 21002 provides that “public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the

significant environmental effects of such projects[.]" The procedures required by CEQA "are intended to assist public agencies in systematically identifying both the significant effects of proposed projects and the feasible alternatives or feasible mitigation measures which will avoid or substantially lessen such significant effects." CEQA Section 21002 goes on to state that "in the event [that] specific economic, social, or other conditions make infeasible such project alternatives or such mitigation measures, individual projects may be approved in spite of one or more significant effects thereof."

The mandate and principles announced in CEQA Section 21002 are implemented, in part, through the requirement that agencies must adopt findings before approving projects for which EIRs are required. (See CEQA Section 21081[a]; CEQA Guidelines Section 15091[a].) For each significant environmental impact identified in an EIR for a proposed project, the approving agency must issue a written finding, based on substantial evidence in light of the whole record, reaching one or more of the three possible findings, as follows:

1) Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the significant impacts as identified in the EIR.

2) Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been, or can or should be, adopted by that other agency.

3) Specific economic, legal, social, technological, other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the EIR.

With respect to a project for which significant impacts are not avoided or substantially lessened either through the adoption of feasible mitigation measures or feasible environmentally superior alternatives, a public agency, after adopting proper findings based on substantial evidence, may nevertheless approve the project if the agency first adopts a statement of overriding considerations setting forth the specific reasons why the agency found that the project's benefits rendered acceptable its unavoidable adverse environmental effects. (See CEQA Guidelines Sections 15093 and 15043[b]; and CEQA Section 21081[b].)

PROCEDURE UNDER THE CITY'S BUILDING REGULATIONS:

The Building Code's procedure for the approval of a demolition permit to demolish an HCM is set forth in LAMC Section 91.106.4.5. The EIR prepared for the Project has been completed in compliance with CEQA, and therefore DCP recommends that DBS certify the information and analysis presented in the EIR. The EIR concluded that the demolition of the Barry Building would result in significant and unavoidable historic resource impacts to the HCM. Pursuant to LAMC Section 91.106.4.5, if the CEQA Initial Study and Check List determines the building or structure meeting the requirements is "significant," DBS shall not issue the permit to demolish, alter, or remove the building or structure without first finding that specific economic, social, or other considerations make infeasible the preservation of the building or structure. DBS's determination to either issue or not issue a demolition permit is appealable to the Board of Building & Safety Commissioners (Board), pursuant to LAMC Section 98.0403.1(b)(2). In addition, the decision of the Board to certify an EIR, adopt a negative declaration or mitigated negative declaration or determine, in writing, that a project is not subject to CEQA, is appealable to the City Council pursuant to LAMC Section 197.01.

CEQA Environmental Findings in accordance with the requirements listed above, to either issue or not issue demolition permits for the Project, have <u>not</u> yet been prepared and are not being presented at this time. DCP recommends that DBS certify the information and analysis presented in the EIR, which may then be considered in DBS's decision to issue or not issue the demolition permit.

RECOMMENDED ACTIONS:

Certify that the following:

1. The 11973 San Vicente Boulevard Project Final EIR has been completed in compliance with the California Environmental Quality Act (CEQA);

2. The 11973 San Vicente Boulevard Project Final EIR was presented to the Department of Building and Safety (DBS) as a decision-making body of the lead agency and DBS reviewed and considered the information contained in the EIR prior to approving the project; and

3. The 11973 San Vicente Boulevard Project Final EIR reflects the independent judgment and analysis of the lead agency.

Regarding DBS's decision to issue or not issue the demolition permit, in the event that a demolition permit is issued by DBS, additional CEQA actions on the Project would need to occur, including the adoption of Environmental Findings, a Statement of Overriding Considerations, and a Mitigation Monitoring Program.

VINCENT P. BERTONI, AICP
Director of Planning

Milena Zasadzien
Principal City Planner
Milena.Zasadzien@lacity.org
213-847-3636

Mindy Nguyen
Senior City Planner

EXHIBIT D1

BOARD OF
BUILDING AND SAFETY
COMMISSIONERS

JAVIER NUNEZ
PRESIDENT

JACOB STEVENS
VICE PRESIDENT

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DEPARTMENT OF
BUILDING AND SAFETY
201 NORTH FIGUEROA STREET
LOS ANGELES, CA 90012

OSAMA YOUNAN, P.E.
GENERAL MANAGER
SUPERINTENDENT OF BUILDING

JOHN WEIGHT
EXECUTIVE OFFICER

May 9, 2024

The Honorable Cultural Heritage Commission
Department of City Planning
Office of Historic Resources
200 North Spring Street
Room 525
Los Angeles, CA 90012

Re: Demolition Permit Application for The Barry Building, located at 11973 West San Vicente Boulevard, Los Angeles Historic Cultural Monument No. 887

Dear Honorable Commissioners:

Under Los Angeles Municipal Code (LAMC) Section 91.106.4.5, the Los Angeles Department of Building and Safety (LADBS) has the responsibility for the issuance of demolition permits for officially designated buildings or structures like the property referenced above.

LAMC Section 91.106.4.5 provides as follows:

> 91.106.4.5. Permits for Historical and Cultural Buildings. The department shall not issue a permit to demolish, alter or remove a building or structure of historical, archaeological or architectural consequence if such building or structure has been officially designated, or has been determined by state or federal action to be eligible for designation, on the National Register of Historic Places, or has been included on the City of Los Angeles list of historic cultural monuments, without the department having first determined whether the demolition, alteration or removal may result in the loss of or serious damage to a significant historical or cultural asset. If the department determines that such loss or damage may occur, the applicant shall file an application and pay all fees for the California Environmental Quality Act Initial Study and Check List, as specified in Section 19.05 of the Los Angeles Municipal Code. If the Initial Study and Check List identifies the historical or cultural asset as significant, the

permit shall not be issued without the department first finding that specific economic, social or other considerations make infeasible the preservation of the building or structure.

Pursuant to this Section, the applicant paid for the preparation of an Environmental Impact Report (EIR). The Department of City Planning prepared an EIR and transmitted it to LADBS on March 21, 2024 with a recommendation that LADBS certify the EIR as adequate and complete. The EIR concluded that issuance of the demolition permit will result in significant unavoidable adverse impacts due to the loss of a historic resource.

The EIR must be certified before LADBS may issue a demolition permit. Additionally, before LADBS may issue a demolition permit, LADBS will need to adopt a statement of overriding considerations setting forth the specific reasons why the City finds that the project's benefits rendered acceptable its unavoidable adverse environmental effects because the significant unavoidable adverse impacts of demolition cannot be avoided or substantially lessened either through the adoption of feasible mitigation measures or feasible environmentally superior alternatives.

To assist LADBS in determining whether to certify the EIR and/or adopt a statement of overriding considerations, LADBS requests the Cultural Heritage Commission, the City's expert on historic resources, to provide a recommendation to LADBS on whether to take these actions including what the Commission believes may be substantial evidence in the record that should be considered in the preparation of a statement of overriding considerations if necessary.

LADBS requests the Commission hold a hearing for review and comment on the EIR and justification for the issuance of a statement of overriding considerations.

For any inquiries related to this letter, please contact Faruk Sezer, Assistant Director for the Government and Community Relations Division via email at Faruk.Sezer@lacity.org.

Faruk Sezer

FARUK SEZER, P.E.
Assistant Director
Government and Community Relations

EXHIBIT E1

LOS ANGELES CULTURAL HERITAGE COMMISSION

200 North Spring Street, Room 272, Los Angeles, California, 90012-4801, (213) 978-1300
www.planning.lacity.org

September 17, 2024

Los Angeles Department of Building and Safety
201 North Figueroa Street
Los Angeles, CA 90012

Attention: Faruk Sezer, P.E., Assistant Director of Government and Community Relations

Barry Building, HCM #887; 11973-11975 W. San Vicente Boulevard; Case No.: CHC-2007-1585-HCM; Related Case No.: ENV-2019-6645-EIR; CD-11

At its meeting of **September 5, 2024**, the Cultural Heritage Commission made the recommendations below in response to a letter from the Department of Building and Safety, dated May 9, 2024, regarding the proposed project to demolish the above-referenced Historic-Cultural Monument:

1. **Recommended** that the Department of Building of Safety certify the Environmental Impact Report; and
2. **Recommended** that the Department of Building and Safety not adopt a Statement of Overriding Considerations

The Commission vote was as follows:

Moved: Barron
Seconded: Kanner
Ayes: Buelna, Kennard, Milofsky

Vote: **5 – 0**

Ari Briski, Commission Office Manager
Cultural Heritage Commission

Attachments: Staff Report

cc: Jeff Khau, Planning Deputy, Council District 11
Sean Silva, Planning Liaison, Council District 11
Ken Bernstein, Principal City Planner, Office of Historic Resources
Lambert Giessinger, Senior Architect, Office of Historic Resources
Shannon Ryan, Senior City Planner, Office of Historic Resources
Melissa Jones, City Planner, Office of Historic Resources
Hector Buitrago, Senior Structural Engineer, Department of Building and Safety
Celeste Morris Nguyen, Structural Engineering Associate, Department of Building and Safety
Kenneth Fong, Deputy City Attorney

BARRY BUILDING, HCM #887
11973-11975 W. San Vicente Boulevard
CHC-2007-1585-HCM
Related Case No: ENV-2019-6645-EIR (SCH#2020110210)

Agenda packet includes:

1. Staff Recommendation Report
2. Los Angeles Department of Building and Safety letter to the Cultural Heritage Commission, dated May 9, 2024
3. Los Angeles Department of City Planning letter to the Los Angeles Department of Building and Safety, dated March 21, 2024
4. Letter from the Property Owner Representative, dated July 15, 2024
5. 11973 San Vicente Boulevard Project Final Environmental Impact Report
6. 11973 San Vicente Boulevard Project Draft Environmental Impact Report
7. Cultural Heritage Commission letter to the City Planning Commission, dated June 7, 2012
8. Historic-Cultural Monument Application

Please click on each document to be directly taken to the corresponding page of the PDF.

Los Angeles Department of City Planning
RECOMMENDATION REPORT

CULTURAL HERITAGE COMMISSION

HEARING DATE: September 5, 2024
TIME: 10:00 AM
PLACE: City Hall, Room 1010
200 N. Spring Street
Los Angeles, CA 90012
and teleconference (see agenda for login information)

CASE NO.: CHC-2007-1585-HCM
RELATED CASE NO: ENV-2019-6645-EIR
CEQA: SCH#2020110210 (EIR)
Location: 11973-11975 W. San Vicente Boulevard
Council District: 11 – Park
Community Plan Area: Brentwood - Pacific Palisades
Land Use Designation: Neighborhood Office Commercial
Zoning: C4-1VL
Area Planning Commission: West Los Angeles
Neighborhood Council: None
Legal Description: Westgate Acres Tract, Arb 1 of Lot 51 and Lot 52

PROJECT: Demolition of the Barry Building, Historic-Cultural Monument #887

REQUEST: Cultural Heritage Commission review and recommendation on the Los Angeles Department of Building and Safety's consideration and certification of the Environmental Impact Report, ENV-2019-6645-EIR, SCH No. 2020110210, for the above-referenced project specific to the EIR's historical analysis, including consideration of whether to adopt a Statement of Overriding Considerations.

OWNER/APPLICANT: 11973 San Vicente LLC
P.O. Box 55007
Los Angeles, CA 90055

REPRESENTATIVE: Edward J. Casey
Alston & Bird
350 South Grand Avenue, 51st Floor
Los Angeles, CA 90071

RECOMMENDATION **That the Cultural Heritage Commission:**

1. **Recommend** the Department of Building and Safety **certify the Environmental Impact Report**; and
2. **Recommend** the Department of Building and Safety **not adopt a Statement of Overriding Considerations**.

VINCENT P. BERTONI, AICP
Director of Planning

[SIGNED ORIGINAL IN FILE]

Ken Bernstein, AICP, Principal City Planner
Office of Historic Resources

[SIGNED ORIGINAL IN FILE]

Lambert M. Giessinger, Senior Architect
Office of Historic Resources

[SIGNED ORIGINAL IN FILE]

Shannon Ryan, Senior City Planner
Office of Historic Resources

[SIGNED ORIGINAL IN FILE]

Melissa Jones, City Planner
Office of Historic Resources

Attachments:

- Los Angeles Department of Building and Safety letter to the Cultural Heritage Commission, dated May 9, 2024
- Los Angeles Department of City Planning letter to the Los Angeles Department of Building and Safety, dated March 21, 2024
- Letter from the Property Owner Representative, dated July 15, 2024
- 11973 San Vicente Boulevard Project Final Environmental Impact Report
- 11973 San Vicente Boulevard Project Draft Environmental Impact Report
- Cultural Heritage Commission letter to the City Planning Commission, dated June 7, 2012
- Historic-Cultural Monument Application

PROJECT SUMMARY

The proposed project is the demolition of the Barry Building, Historic-Cultural Monument (HCM) #887; the portion of the project site (APN 4404-025-008) that currently contains the Barry Building would become a vacant lot, and the existing surface parking lot at the rear of the building would remain. A landscape buffer would be installed along the southern boundary of the project site fronting San Vicente Boulevard. Three on-site palms would be removed; however, the fourth on-site palm and two street trees located along San Vicente Boulevard would remain. No future development of the site is proposed and/or considered as part of the project.

The Barry Building is located on the north side of San Vicente Boulevard between Montana Avenue and Saltair Avenue in Brentwood. Built in 1951, this two-story commercial building was designed by Los Angeles architect Milton H. Caughey (1911-1958) for David Barry, Jr. as ground floor retail with four wings of offices around a central courtyard lushly landscaped with tropical plants. First housing Brentwood Books in 1960 and subsequently Dutton's Brentwood Books starting in 1984, the building's ground-floor storefront and courtyard served the Brentwood community as a bookstore and café for nearly 50 years, until 2008. The building has been vacant and fenced off since 2017.

The subject building is an excellent example of International Style modern architecture, reflected in its flat roof with wide overhanging eaves; smooth stucco cladding; floor-to-ceiling grid and louver windows on the interior courtyard; and horizontal band of windows originally screened with louvered wood grilles on the primary, south-facing facade (removed without approvals in 2016). The courtyard is landscaped with raised flagstone and concrete planters containing a variety of palm trees, as well as four steel-framed benches with wood slat seating and backing. Two curved staircases, one in the northeast corner and one in the southwest corner, provide access to the cantilevered second-story exterior walkway that encircles the courtyard. Each staircase consists of "floating" concrete treads in steel pans supported on triangular concrete mono stringers. Steel pipes support both the stairs and second floor walkway railings, with exposed detailing such as exposed metal plates and bolts serving as decorative elements. Louvered and gridded wood screens shelter portions of the east and west balconies. A passage at the northeast corner of the courtyard connects it to a rear parking lot.

Alterations to the subject property include a 1993 addition of a small receiving and storage structure at the rear. The screens originally separating the rear patios from the parking lot were removed, as were a few of the original windows which have been replaced with aluminum windows. The men's bathroom was remodeled and a low ramp was added in the courtyard. A large section of the original planting at the center of the courtyard was paved. All of these alterations were completed prior to the subject building's HCM designation and determined by staff of the Office of Historic Resources to not have compromised its architectural integrity.

BACKGROUND

The City Council designated the Barry Building as HCM #887 on October 2, 2007. The City Council found that the building was significant under two of the Cultural Heritage Ordinance criteria: 1) it reflects "the broad cultural, economic, or social history of the nation, State or community" as the longtime home of Dutton's Brentwood Bookstore, a symbol of the Los Angeles literary scene, that contributed to the growth and development of the San Vicente commercial corridor in Brentwood; and 2) it "embodies the distinguishing characteristics of an architectural type specimen, inherently valuable for a study of a period style or method of construction" as a distinguished example of International Style architecture.

On April 6, 2009, the current property owner filed an application for the redevelopment of a site containing the subject property with a 73,300-square foot commercial center, at grade and subterranean parking facility, and a single-family dwelling under case numbers CPC-2009-1064-GPA-VZC-HD-SP-CUB-ZV-SPR and ENV-2009-1065-EIR (the 'Green Hollow Square Project'). In 2011, a Draft Environmental Impact Report (DEIR) was circulated for review and comment by the public and other interested parties, agencies, and organizations. After holding a public hearing on April 7, 2011, the Cultural Heritage Commission (Commission) submitted a formal communication on April 19, 2011, to the Department of City Planning expressing concerns over the proposed demolition of the Barry Building and supporting a preservation alternative that adequately incorporated the subject building into the proposed development. A second hearing was held before the Commission on June 7, 2012, and the Commission reviewed and approved a draft letter addressed to the City Planning Commission reiterating its concerns:

> *Any concerted effort to purposefully demolish a Historic-Cultural Monument for a replacement prcject 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 prcject goals of the proposed prcject. Other prcjects 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 prcjects.*

The applicant withdrew the application for the proposed development project in October 2013.

On October 21, 2014, the Los Angeles Department of Building and Safety (LADBS) inspected the property and it was determined that it falls within the scope of the City's Soft-Story Retrofit Program (Division 93, Article I, Chapter IX of the Los Angeles Municipal Code (LAMC) Section 91.9300 et seq., Mandatory Earthquake Hazard Reduction in Existing Wood-Frame Buildings with Soft, Weak or Open Front Walls). In March 2018, LADBS issued an order for the property to comply with the Ordinance; as per LAMC Section 91.9305.1, compliance can be achieved through structural retrofitting or demolition. This provision, however, applies generally to buildings that are subject to the Soft-Story Retrofit Program and does not expressly address the demolition of historic resources.

In 2019, to comply with the Soft-Story Retrofit Program, the property owner of the Barry Building applied for permits to demolish the building, with no further plans for development of the project site. This proposed demolition project is subject to processes outlined in LAMC Section 91.106.4.5 and Los Angeles Administrative Code (LAAC) Sections 22.171.14 and 22.171.15; Sections 91.106.4.5 and 22.171.14(b)(2) both require compliance with the California Environmental Quality Act (CEQA) for demolition of an HCM. As the Barry Building is designated as an HCM, it is considered an Historical Resource under CEQA Guidelines Section 15064.5(a)(2). Demolition of an Historical Resource would cause an unavoidable substantial adverse change in the environment and requires the preparation of an Environmental Impact Report (EIR) to serve as an informational document for public agency decision-makers and the general public regarding the project's and environmental impacts. As such, in accordance with CEQA, the Department of City Planning prepared an EIR (ENV-2019-6645-EIR, the Draft EIR and Final EIR collectively referred to as the '11973 San Vicente Boulevard Project EIR'). The Draft EIR was released on February 16, 2023 and was made available for public comment through April 18, 2023. The Final EIR was published on September 11, 2023.

Pursuant to LAMC Section 91.106.4.5, LADBS has the discretion to determine whether the demolition, alteration, or removal of any HCM may result in the loss of or serious damage to a significant historical or cultural resource and have the proper CEQA analysis prepared. Additionally, because the project only consists of demolition and there is no replacement project proposed that would require a planning entitlement, the certification of the EIR falls to LADBS, who cannot issue a demolition permit without first finding that specific economic, social, or other considerations make infeasible the preservation of the building through the adoption of a Statement of Overriding Considerations (SOC).

The Department of City Planning transmitted the 11973 San Vicente Boulevard Project EIR to LADBS on March 21, 2024, with a recommendation that LADBS certify the EIR as having been completed in compliance with CEQA. Before LADBS may issue a demolition permit, the EIR must be certified and a SOC must be adopted, setting forth the specific reasons why LADBS finds that the project's benefits outweigh the adverse environmental effects of demolition of an historical resource. Pursuant to the Cultural Heritage Ordinance (codified in LAAC 22.171, et seq.), the demolition permit can be referred to the Commission consistent with the process prescribed in LAAC Sections 22.171.14(b)(2), where the Commission is required to ensure that any demolition of an HCM needs compliance with CEQA. LAAC Section 22.171.15 affords the Commission an opportunity to object to the proposed demolition, which may occur after LADBS certifies the EIR.

On May 9, 2024, LADBS submitted a letter to the Commission requesting the Commission, as the City's expert on historical resources and body charged with the responsibility to designate and protect the City's designated historical resources, hold a hearing to review and provide a recommendation to LADBS on the EIR and potential justification for the adoption of a SOC. More specifically, LADBS is requesting the Commission to assist LADBS in determining whether to certify the EIR as complete and in compliance with CEQA and/or what the Commission believes may be substantial evidence in the record that should be considered in the preparation of a SOC, if necessary. Thus, in response to LADBS's request, and in accordance with LAAC 22.171.11, the Commission may provide comments and recommendations.

DISCUSSION

1. **The EIR has been completed in compliance with the California Environmental Quality Act (CEQA), Public Resources Code (PRC) Section 21000 et seq. and the California Code of Regulations Title 15, Chapter 6 (CEQA Guidelines).**

CEQA, codified in PRC Section 21000 et seq., was enacted in 1970 with several basic purposes, including: (1) to inform governmental decision makers and the public about the potential significant environmental effects of proposed projects; (2) to identify ways that environmental damage can be avoided or significantly reduced; (3) to prevent significant, avoidable damage to the environment by requiring changes in projects through the use of feasible alternatives or mitigation measures; and (4) to disclose to the public the reasons behind a project's approval even if significant environmental effects are anticipated.

The City of Los Angeles (City), as Lead Agency, has evaluated the environmental impacts of implementation of the proposed demolition project by preparing an EIR (Case No. ENV-2019-6645-EIR/State Clearinghouse No. 2020110210). The EIR was prepared in compliance with CEQA, PRC Section 21000 et seq., and the CEQA Guidelines.

PRC Section 21002 provides that "public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects[.]" The procedures required by CEQA "are intended to assist public agencies in systematically identifying both the significant effects of proposed projects and the feasible alternatives or feasible mitigation measures which will avoid or substantially lessen such significant effects." CEQA Section 21002 goes on to state that "in the event [that] specific economic, social, or other conditions make infeasible such project alternatives or such mitigation measures, individual projects may be approved in spite of one or more significant effects thereof."

Prior to approving a project that requires an EIR, the decision maker (in this case, LADBS) on a project is required to certify that the EIR complies with CEQA and that it was considered prior to approving the project. Specifically, the decision maker must certify the following:

1. The Final EIR has been completed in compliance with CEQA;
2. The Final EIR was presented to the decision making body of the lead agency and that the decision making body reviewed and considered the information contained in the Final EIR prior to approving the project; and
3. The Final EIR reflects the lead agency's independent judgment and analysis.

After certifying the EIR is complete and was considered, the mandate and principles announced in PRC Section 21002 are implemented, in part, through the requirement that agencies must adopt findings before approving projects for which EIRs are required. (See PRC Section 21081[a]; CEQA Guidelines Section 15091[a]). For each significant environmental impact identified in an EIR for a proposed project, the approving agency must issue a written finding, based on substantial evidence in light of the whole record, reaching one or more of the three possible findings, as follows:

1) Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the significant impacts as identified in the EIR.

2) Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been, or can or should be, adopted by that other agency.

3) Specific economic, legal, social, technological, other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the EIR.

With respect to a project for which significant impacts are not avoided or substantially lessened either through the adoption of feasible mitigation measures or feasible environmentally superior alternatives, a public agency, after adopting proper findings based on substantial evidence, may nevertheless approve the project if the agency first adopts a SOC setting forth the specific reasons why the agency found that the project's benefits rendered acceptable its unavoidable adverse environmental effects. (See CEQA Guidelines Sections 15093 and 15043[b]; and PRC Section 21081[b]).

The EIR concluded that issuance of the demolition permit for the Barry Building will result in significant unavoidable adverse impacts due to the loss of an historical resource and the proposed project would conflict with the goals, objectives, and policies of the General Plan Conservation Element to protect historical resources and the Brentwood-Pacific Palisades Community Plan goals, objectives, and policies related to historic preservation.

After determining the project would result in significant impacts, the EIR looked at a range of alternatives to the demolition project that would rehabilitate and preserve the Barry Building:

- **Alternative 1 – the No Project Alternative**, assumes that the demolition project would not be implemented, and the existing building would not be demolished. However, as the Barry Building is required to comply with the Soft-Story Retrofit Program, the mandatory seismic retrofit work on the south wing is included in this alternative, but no other structural or accessibility upgrades would be made.

- **Alternative 2 – the Preservation Alternative**, involves voluntary seismic retrofit and accessibility upgrades, building code updates, and energy efficiency upgrades of the existing building, after which the building would be re-occupied by approximately 12,800 square feet of retail uses.

- **Alternative 3 – the Partial Preservation with New Construction Alternative**, involves the partial preservation of the existing building with new construction on the remaining portion of the project site. Specifically, Alternative 3 would preserve the south, east, and west wings of the building, the courtyard, and the south façade of the north wing, including the voluntary seismic retrofit, accessibility upgrades, building code updates, and energy efficiency upgrades to the preserved portion of the existing building. In addition, Alternative 3 would include the construction of a new building behind (north of) the existing building. In total, Alternative 3 would include approximately 19,771 square feet of office and retail uses.

- **Alternative 4 – the Relocation Alternative**, involves the dismantling of the Barry Building into multiple small building portions to facilitate its relocation to a new site, which has yet to be identified. At the new location, the Barry Building would be reconstructed, which would incorporate additional preservation measures relating to seismic retrofitting, accessibility updates, building code updates, and energy efficiency upgrades. Once the building has been moved and rehabilitated, it would be occupied by 12,800 square feet of retail uses.

The EIR evaluated the potential impacts of each of these alternatives, as compared to the proposed demolition project, as well as whether the alternatives would meet the project objectives. As stated in the EIR, the objectives of the project are to: 1) comply with the Soft-Story Retrofit Program, which includes complying with the requirements under LAMC Section 91.9305 and 2) abate the fire, loitering, vandalism, and other public safety hazards associated with structural defects and current vacancy of the Barry Building. Also taken into consideration in the EIR was whether the significant impacts of the demolition project would be reduced or eliminated by the proposed alternatives.

Staff recommends that the Commission recommend to LADBS that the EIR has been completed in compliance with CEQA, PRC Section 21000 et seq. and the California Code of Regulations Title 15, Chapter 6 (CEQA Guidelines), and recommend that the EIR be certified by LADBS.

2. There is not substantial evidence in the record to support the adoption of a Statement of Overriding Considerations.

As outlined in LAMC 91.106.4.5, if the CEQA Initial Study and Checklist determines the building or structure meeting the requirements is historically "significant," LADBS shall not issue the permit to demolish, alter, or remove the building or structure without first finding that specific economic, social, or other considerations make infeasible the preservation of the building or structure.

CEQA Guidelines Section 15093(b) dictates that a public agency or decision-maker must adopt a SOC if significant adverse environmental effects have been identified in the EIR that cannot be

substantially mitigated to an insignificant level or be eliminated. The purpose of a SOC is to document a finding that the benefits of a project outweigh the project's significant and unavoidable impacts as balanced by the decision-maker, in this case LADBS. As per California Code of Regulations Title 14 Section 15093, if the specific economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposed project outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered 'acceptable.'

A key policy of CEQA under PRC Section 21001 (b) and (c) is that the City as the lead agency, "take all action necessary to provide the people of this state with clean air and water, enjoyment of aesthetic, natural, scenic, and historic environmental qualities…and preserve for future generations representations of all plant and animal communities and examples of the major periods of California history."

As outlined in its July 15, 2024 letter (attached), the applicant contends that the benefits, goals, and objectives of the proposed project outweigh the impact of the demolition of the HCM for the following reasons: 1) *Removal of an existing safety hazard and seismically unsafe and noncompliant structure; 2) Removal of an attractive nuisance for vandals, transient populations, loitering, and other unlawful behavior; 3) Clear the existing property of noncompliant structures in a manner that will not preclude any future development consistent with existing zoning; and 4) Comply with the Soft-Story Ordinance, which provides for demolition at the owner's option, within the time limits as specified in the Ordinance, is the only economically feasible course of action.*

Staff recommends that the above benefits of the project are not supported with substantial evidence based on the following. The subject building was constructed in 1951 and has withstood the test of time, remaining standing over the past 70 years through multiple significant seismic events including in 1971 (San Fernando, magnitude 6.6), 1987 (Whittier-Narrows, magnitude 5.9), and 1994 (Northridge, magnitude 6.7). At the time that the building was vacated in 2016, the subject building was not deemed dangerous or unfit for human habitation by LADBS nor was it slated to be condemned.

Furthermore, it can be argued that the property owner created this problem by voluntarily vacating the building and leaving it unoccupied for over eight years. The proposed project is to demolish the building, rendering the site a vacant lot, with no proposed replacement structure. In the balancing test of a project's public benefit versus its impacts to historical resources under CEQA, a vacant lot frequently contributes to additional community problems, serving as a further detriment while not conferring any additional benefits. As it is commonly known, vacant lots (inclusive of vacant buildings) can have many negative impacts on communities that include increases in crime, vagrancy, damaging effects on mental and physical health, a reduction in values of neighboring properties, and decreased tax revenue.[1,2] Vacant lots also detract from efforts to create cohesive, vibrant, and pedestrian-friendly neighborhood commercial corridors, such as the San Vicente Commercial

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[1] Branas, C. C., Rubin, D., & Guo, W. 2013. "Vacant Properties and Violence in Neighborhoods." *ISRN Public Health*, *2012*, 246142. https://doi.org/10.5402/2012/246142.

[2] Stern, Matthew, and T. William Lester. 2020. "Does Local Ownership of Vacant Land Reduce Crime? An Assessment of Chicago's Large Lots Program." *Journal of the American Planning Association* 87 (1): 73–84. https://doi.org/10.1080/01944363.2020.1792334.

Corridor as highlighted in a report published by the National Trust for Historic Preservation and the Urban Land Institute.[3]

In addition, one of the primary objectives of the Brentwood-Pacific Palisades Community Plan is to "preserve and enhance neighborhoods with a distinctive and significant historic character" and the plan actively promotes the protection and reuse of the area's historic resources through its policies. Nevertheless, retaining the subject building does not preclude a future project that may involve the demolition of the building and construction of a new building. As stated by the applicant, there is not a foreseeable project, so it is not appropriate to weigh the purely speculative benefit of clearing the lot for an unknown future project.

And finally, out of the over 880,000 parcels in the City of Los Angeles, only 12,347 buildings are subject to the Soft-Story Retrofit Program, and of these 76-percent have complied as of February 2024; 30 of these, or 0.2 percent, complied through demolition. According to the applicant, only three other Historic-Cultural Monuments are subject to this ordinance–all of which have complied with the ordinance by retrofitting the building. These three buildings are the Elkay Apartments (HCM #368) located at 638-642½ S. Kelton Avenue that complied with the ordinance in 2022, the Sheets Apartments (HCM #367) located at 10919 W. Strathmore Drive that complied with the ordinance in 2022, and the Roberts Apartments (HCM #1185) located at 3740-3744 Landa Street; 1780 N. Griffith Park Boulevard that complied with ordinance in 2020.

Applicants argue the benefit of the project is the "*remov[ai] of an existing safety hazard and seismically unsafe and noncompliant structure."* However, it is arguable that substantial evidence does not support that it is necessary to demolish the building to attain this "benefit." Compliance with the Soft-Story Retrofit Program only requires the south facade of the building to be retrofitted and would not require any accessibility upgrades. As an historical resource, the subject building would be able to utilize the California State Historical Building Code, which provides alternative building regulations for permitting repairs, alterations, and additions necessary for the preservation, rehabilitation, relocation, related construction, change of use, or continued use of a qualified historical building or structure. Specifically, the code is intended to provide for reasonable safety from fire, seismic forces or other hazards for occupants and users of such buildings, structures and properties and to provide reasonable availability and usability by the physically disabled. In addition, if upgrades were pursued, the Americans with Disabilities Act (ADA) enables designated historical properties to meet minimum standards if full compliance with the regular code would threaten or destroy the historical significance of the property. As such, while it may be a benefit to remove the hazard, demolition is not necessary to remove the hazard.

Apart from the potential loss of the designated historic resource, the Barry Building is one of the rare examples of commercial mid-20th century modern design designated as an HCM. In fact, a preliminary review suggests that out of over 1,300 designated HCMs, the Barry Building is only one of a handful of modernist commercial buildings that include: the Neutra Office Building (HCM #676; constructed in 1951); the Jones and Emmons Building (HCM #696; constructed in 1954); CBS Columbia Square Studios (HCM #947, constructed in 1938); and the Musicians Union of Hollywood (HCM #1158, constructed in 1950). Further, of the 51 HCMs in the Brentwood-Pacific Palisades community, there are only two other commercial buildings: the Gas Station (HCM #387) on South Barrington Avenue and the Pacific Palisades Business Block (HCM #276) on Sunset Boulevard and

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[3] National Trust for Historic Preservation Preservation Green Lab and the Urban Land Institute. "Untapped Potential: Strategies for Revitalization and Reuse." 2017. https://ohp.parks.ca.gov/pages/1054/files/Untapped%20Potential%20Green%20Lab%20ULI.pdf.

Via de la Paz. Additionally, the subject building is significant to the cultural identity of the San Vicente Commercial Corridor. As a well-recognized gathering spot and local landmark, the subject building's relationship between its commercial identity and its unique architectural design have contributed greatly to the growth and development of San Vicente Boulevard as a vibrant commercial corridor.

CONCLUSION

LADBS has requested that the Commission give its recommendation on the adequacy of the EIR's analysis as it relates to historical impacts to the Barry Building. If the Commission agrees with staff that the EIR, ENV-2019-6645-EIR, SCH No. 2020110210, for the proposed demolition project was prepared in compliance with CEQA, PRC Section 21000 et seq., and the CEQA Guidelines, the Commission can recommend to LADBS that the EIR be certified.

LADBS requested the Commission advise on whether LADBS should adopt a SOC pursuant to CEQA Guidelines Section 15193. If the Commission believes the benefits of the demolition of the Barry Building outweigh its significant environmental impacts, the Commission can recommend that LADBS adopt a SOC. If the Commission believes the benefits of the demolition of the Barry Building do not override its significant environmental impacts, the Commission can recommend LADBS not adopt a SOC. It should be noted however, that LADBS is required to decide whether to adopt EIR findings and a SOC in its independent judgment as the decisionmaker and as based on substantial evidence.

BOARD OF
BUILDING AND SAFETY
COMMISSIONERS

JAVIER NUNEZ
PRESIDENT

JACOB STEVENS
VICE PRESIDENT

CORISSA HERNANDEZ
MOISES ROSALES
NANCY YAP

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JOHN WEIGHT
EXECUTIVE OFFICER

May 9, 2024

The Honorable Cultural Heritage Commission
Department of City Planning
Office of Historic Resources
200 North Spring Street
Room 525
Los Angeles, CA 90012

Re: Demolition Permit Application for The Barry Building, located at 11973 West San Vicente Boulevard, Los Angeles Historic Cultural Monument No. 887

Dear Honorable Commissioners:

Under Los Angeles Municipal Code (LAMC) Section 91.106.4.5, the Los Angeles Department of Building and Safety (LADBS) has the responsibility for the issuance of demolition permits for officially designated buildings or structures like the property referenced above.

LAMC Section 91.106.4.5 provides as follows:

> 91.106.4.5. Permits for Historical and Cultural Buildings. The department shall not issue a permit to demolish, alter or remove a building or structure of historical, archaeological or architectural consequence if such building or structure has been officially designated, or has been determined by state or federal action to be eligible for designation, on the National Register of Historic Places, or has been included on the City of Los Angeles list of historic cultural monuments, without the department having first determined whether the demolition, alteration or removal may result in the loss of or serious damage to a significant historical or cultural asset. If the department determines that such loss or damage may occur, the applicant shall file an application and pay all fees for the California Environmental Quality Act Initial Study and Check List, as specified in Section 19.05 of the Los Angeles Municipal Code. If the Initial Study and Check List identifies the historical or cultural asset as significant, the

permit shall not be issued without the department first finding that specific economic, social or other considerations make infeasible the preservation of the building or structure.

Pursuant to this Section, the applicant paid for the preparation of an Environmental Impact Report (EIR). The Department of City Planning prepared an EIR and transmitted it to LADBS on March 21, 2024 with a recommendation that LADBS certify the EIR as adequate and complete. The EIR concluded that issuance of the demolition permit will result in significant unavoidable adverse impacts due to the loss of a historic resource.

The EIR must be certified before LADBS may issue a demolition permit. Additionally, before LADBS may issue a demolition permit, LADBS will need to adopt a statement of overriding considerations setting forth the specific reasons why the City finds that the project's benefits rendered acceptable its unavoidable adverse environmental effects because the significant unavoidable adverse impacts of demolition cannot be avoided or substantially lessened either through the adoption of feasible mitigation measures or feasible environmentally superior alternatives.

To assist LADBS in determining whether to certify the EIR and/or adopt a statement of overriding considerations, LADBS requests the Cultural Heritage Commission, the City's expert on historic resources, to provide a recommendation to LADBS on whether to take these actions including what the Commission believes may be substantial evidence in the record that should be considered in the preparation of a statement of overriding considerations if necessary.

LADBS requests the Commission hold a hearing for review and comment on the EIR and justification for the issuance of a statement of overriding considerations.

For any inquiries related to this letter, please contact Faruk Sezer, Assistant Director for the Government and Community Relations Division via email at Faruk.Sezer@lacity.org.

Faruk Sezer

FARUK SEZER, P.E.
Assistant Director
Government and Community Relations

FORM GEN. 160 (Rev. 6-80)

CITY OF LOS ANGELES
INTER-DEPARTMENTAL CORRESPONDENCE

DATE: March 21, 2024

TO: Osama Younan, General Manager
Frank Lara, Director
Department of Building and Safety

FROM: Milena Zasadzien
Principal City Planner
Department of City Planning

SUBJECT: **PROPOSED DEMOLITION OF BARRY BUILDING, 11973 SAN VICENTE BLVD**

In 2007, the Los Angeles City Council adopted the City of Los Angeles Cultural Heritage Commission's (CHC's) recommendation to designate the Barry Building, located at 11973-11975 San Vicente Boulevard (Project Site), as Historical-Cultural Monument (HCM) No. LA-887. In 2019, the property owner of the Barry Building applied for permits to demolish the building, with no further plans for development of the Project Site. The City of Los Angeles has codified two separate processes for consideration of the issuance of demolition permits for HCMs, such as the Barry Building. One of the processes is codified in Los Angeles Municipal Code (LAMC) Section 91.106.4.5 and is administered by the Los Angeles Department of Building and Safety (DBS) (DBS Process). The other process is codified in Los Angeles Administrative Code (LAAC) Sections 22.171.14 and 22.171.15 and involves the CHC and potentially the City Council (CHC Process). Both processes require compliance with the California Environmental Quality Act (CEQA). As the Barry Building has been designated as an HCM, it is considered a Historical Resource under CEQA Guidelines, Section 15064.5(a)(2). Demolition of a Historical Resource would cause an unavoidable substantial adverse change in the environment requiring preparation of an Environmental Impact Report (EIR). As such, an EIR has been prepared by the Department of City Planning (DCP), in accordance with CEQA, to serve as an informational document for public agency decision-makers and the general public regarding the objectives and environmental impacts of the demolition of the Barry Building. This memo serves to provide information to DBS related to the certification of the EIR.

PROJECT DESCRIPTION:

The 11973 San Vicente Boulevard Project (Project) consists of demolition of the existing two-story commercial building, commonly referred to as the Barry Building. The existing building is an HCM that has been vacant and fenced since 2017. Once demolition activities are complete, the portion of the Project Site that currently contains the Barry Building would be a vacant lot, and the existing surface parking lot would remain. A landscaped buffer would be installed along the southern boundary of the Project Site (fronting San Vicente Boulevard). No future development of the Project Site is proposed or considered as part of the Project.

ENVIRONMENTAL IMPACT REPORT:

The City of Los Angeles (City), as Lead Agency, has evaluated the environmental impacts of implementation of the Project by preparing an EIR (Case No. ENV-2019-6645-EIR/State Clearinghouse No. 2020110210). The EIR was prepared in compliance with the California Environmental Quality Act of 1970 (CEQA), Public Resources Code (PRC) Section 21000 et seq. and the California Code of Regulations Title 15, Chapter 6 (CEQA Guidelines).

CEQA Section 21002 provides that “public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the

significant environmental effects of such projects[.]" The procedures required by CEQA "are intended to assist public agencies in systematically identifying both the significant effects of proposed projects and the feasible alternatives or feasible mitigation measures which will avoid or substantially lessen such significant effects." CEQA Section 21002 goes on to state that "in the event [that] specific economic, social, or other conditions make infeasible such project alternatives or such mitigation measures, individual projects may be approved in spite of one or more significant effects thereof."

The mandate and principles announced in CEQA Section 21002 are implemented, in part, through the requirement that agencies must adopt findings before approving projects for which EIRs are required. (See CEQA Section 21081[a]; CEQA Guidelines Section 15091[a].) For each significant environmental impact identified in an EIR for a proposed project, the approving agency must issue a written finding, based on substantial evidence in light of the whole record, reaching one or more of the three possible findings, as follows:

1) Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the significant impacts as identified in the EIR.

2) Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been, or can or should be, adopted by that other agency.

3) Specific economic, legal, social, technological, other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the EIR.

With respect to a project for which significant impacts are not avoided or substantially lessened either through the adoption of feasible mitigation measures or feasible environmentally superior alternatives, a public agency, after adopting proper findings based on substantial evidence, may nevertheless approve the project if the agency first adopts a statement of overriding considerations setting forth the specific reasons why the agency found that the project's benefits rendered acceptable its unavoidable adverse environmental effects. (See CEQA Guidelines Sections 15093 and 15043[b]; and CEQA Section 21081[b].)

PROCEDURE UNDER THE CITY'S BUILDING REGULATIONS:

The Building Code's procedure for the approval of a demolition permit to demolish an HCM is set forth in LAMC Section 91.106.4.5. The EIR prepared for the Project has been completed in compliance with CEQA, and therefore DCP recommends that DBS certify the information and analysis presented in the EIR. The EIR concluded that the demolition of the Barry Building would result in significant and unavoidable historic resource impacts to the HCM. Pursuant to LAMC Section 91.106.4.5, if the CEQA Initial Study and Check List determines the building or structure meeting the requirements is "significant," DBS shall not issue the permit to demolish, alter, or remove the building or structure without first finding that specific economic, social, or other considerations make infeasible the preservation of the building or structure. DBS's determination to either issue or not issue a demolition permit is appealable to the Board of Building & Safety Commissioners (Board), pursuant to LAMC Section 98.0403.1(b)(2). In addition, the decision of the Board to certify an EIR, adopt a negative declaration or mitigated negative declaration or determine, in writing, that a project is not subject to CEQA, is appealable to the City Council pursuant to LAMC Section 197.01.

CEQA Environmental Findings in accordance with the requirements listed above, to either issue or not issue demolition permits for the Project, have <u>not</u> yet been prepared and are not being presented at this time. DCP recommends that DBS certify the information and analysis presented in the EIR, which may then be considered in DBS's decision to issue or not issue the demolition permit.

RECOMMENDED ACTIONS:

Certify that the following:

1. The 11973 San Vicente Boulevard Project Final EIR has been completed in compliance with the California Environmental Quality Act (CEQA);

2. The 11973 San Vicente Boulevard Project Final EIR was presented to the Department of Building and Safety (DBS) as a decision-making body of the lead agency and DBS reviewed and considered the information contained in the EIR prior to approving the project; and

3. The 11973 San Vicente Boulevard Project Final EIR reflects the independent judgment and analysis of the lead agency.

Regarding DBS's decision to issue or not issue the demolition permit, in the event that a demolition permit is issued by DBS, additional CEQA actions on the Project would need to occur, including the adoption of Environmental Findings, a Statement of Overriding Considerations, and a Mitigation Monitoring Program.

VINCENT P. BERTONI, AICP
Director of Planning

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via Mail & Email

July 15, 2024

Ken Bernstein
Principal City Planner
Office of Historic Resources
Los Angeles, California
ken.bernstein@lacity.org

Re: 11973 San Vicente Boulevard Project / ENV-2019-6645-EIR / State Clearinghouse No. 2020110210 ("Barry Building")

Dear Mr. Bernstein,

This firm represents the Project Applicant in the above-referenced matter, in which the Project Applicant seeks one permit from the City of Los Angeles (City)—a demolition permit ("Demo Permit"). On May 9, 2024, the Department of Building and Safety (DBS) issued a written request to Cultural Heritage Commission (CHC) for their recommendation on adoption of a Statement of Overriding Considerations (SOC) pursuant to the California Environmental Quality Act (CEQA).[1] The purpose of an SOC is to document a finding that the benefits of a project outweigh the project's significant and unavoidable impacts as balanced by the decision-maker. "If the specific economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposal project outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered 'acceptable.'" (Cal. Code Regs., tit. 14, § 15093.)

[1] DBS's May 9th request also sought CHC's recommendation with respect to certification of the Environmental Impact Report (EIR) prepared for the Demo Permit as to its legal adequacy under CEQA. The Department of City Planning (Planning Dept.) prepared the EIR in compliance with CEQA, published the Final EIR in September 2023, and recommended on March 21, 2024 that DBS certify the information and analysis presented in the EIR as compliant with CEQA. (See Attachment C.) Since the Planning Dept. recommended certification of the EIR, the Project Applicant requests that CHC concur with that recommendation.

To aide CHC in weighing the balance of the Demo Permit's benefits and unavoidable impacts in support of an SOC, we provide the following information and analysis below. In addition, a draft SOC is provided for consideration. (See Attachment A.)

I. Background

Located at 11973 San Vicente Boulevard, the Barry Building is a two-story commercial building which was designated as an Historic-Cultural Monument (HCM) No. LA-887 in 2007 for its Mid-century Modern commercial architectural style.[2] The Barry Building is currently seismically unsound and is not suitable for occupancy. On October 21, 2014, the property was inspected by DBS. Based on their inspection of the Property, DBS determined that the Barry Building falls within the scope of Division 93, Article I, Chapter IX of the Los Angeles Municipal Code (Los Angeles Municipal Code (LAMC) § 91.9300 et seq.), titled *Mandatory Earthquake Hazard Reduction in Existing Wood Frame Buildings with Scft, Weak or Cpen Front Walls* (also known as the "Soft Story Ordinance"). In early 2018, DBS issued an Order to Comply with the Ordinance to the Project Applicant (building owner).[3] Compliance requires either retrofitting or demolishing of the building. (LAMC § 91.9305.1.) The Project Applicant filed an application for a demolition permit from DBS in 2019 in order to comply with DBS's order regarding the Soft Story Ordinance. (See Appendix B-1 to the FEIR.) This permit request triggered the need to complete an Environmental Impact Report (EIR).

II. Structural Integrity of the Barry Building

Upon inspection of the site, DBS determined that the Barry Building is subject to the Soft Story Ordinance as it has a "soft story" likely to suffer significant damage during or after an earthquake. As a result, the building must comply with the Soft Story Ordinance or face penalties.[4] The Barry Building must either undergo seismic retrofitting or demolition to meet the minimum seismic standards outlined in the Soft Story Ordinance.[5]

Englekirk Structural Engineers prepared a technical report dated June 1, 2021 (Appendix H-2 of the Draft EIR) to evaluate the work required to retrofit the existing building to conform to the City's Soft Story Ordinance (see "Phase I" discussion). As the Englekirk report notes, the south

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[2] The Barry Building has not been designated or deemed eligible for designation under state or federal historic codes.

[3] The building has been vacant since 2017.

[4] Previously, the Project Applicant proposed redevelopment of the site ("Green Hollow Square Project") however this project faced significant opposition and the entitlement application was withdrawn.

[5] Given, among other reasons, the time it has taken to prepare an EIR, the Applicant was required to obtain an extension of the deadline to comply with the Soft Story Ordinance. The current deadline by which DBS is requiring the Applicant to comply with the Soft Story Ordinance is August 9, 2024. The Applicant will be submitting another request to extend the deadline this week.

wing of the building that faces San Vicente Boulevard utilizes a pass-through at the ground floor that accesses the interior courtyard. As a result, there are no bearing walls that extend to the foundation and instead the second floor is supported on a series of isolated steel columns. The seismic retrofit scheme to correct this "soft story" consists of steel moment frame structures that are located within the Barry Building and are supported on new concrete footings. These steel moment frame structures provide lateral bracing for the south wing. In addition, new wood shear walls would be installed to minimize architectural impact on the Barry Building. This scheme is depicted in the sketches attached on pages 3-8 of this report.

However, in addition to the seismic work required to comply with the Soft Story Ordinance, additional structural retrofitting work is also needed on the remaining wings to make the building safe for occupancy. (See Appendix H-3 to the DEIR.) Englekirk Structural Engineers' analysis found that the Barry Building's seismic force resisting system is highly overstressed. The report notes several structural deficiencies in the Barry Building. For example, (1) interior demising walls do not form a complete seismic-force-resisting system or a complete lateral bracing system; (2) vertical elements of the seismic-force-resisting system are discontinuous between floors; (3) the north, east, and west wings range from being 190% - 650% overstressed; (4) the steel posts in the south wing do not possess any lateral resistance, so a possible collapse of this wing could result during a seismic event; (5) there is no existing wall or lateral resisting element to resist seismic loads in the south wing, so significant lateral displacement may be expected during a seismic event; and (6) the demand over capacity ratios for the typical diaphragm at the roof and second floor is highly overstressed.

Englekirk identified and prepared a seismic retrofit scheme that outlines the work required to address the issues identified above. (This report is included as Appendix G to the DEIR.) This work includes new and strengthened wood shear walls, new foundations to support the seismic loads resisted by the new shear walls, and adding and strengthening the first floor, second floor, and roof diaphragms among other work.

Section 91.9308 of the Soft Story Ordinance applies specifically to historic buildings, and notes that "qualified historical buildings shall comply with the requirements of the California Historical Building Code." This Code allows for a building retrofit to meet 75% of the current Building Code forces. However, upon examination of the Barry Building and its current very high levels of overstress (up to 650%), Englekirk determined that significant retrofitting was needed, and that the work identified in their Seismic Assessment was still required if the Historical Building Code were applied. (See Appendix I of the FEIR.)

In addition to the extensive seismic work that would be required to retrofit the Barry Building, significant work is needed to update the building in compliance with the Americans with Disabilities Act (ADA). Gruen Associates conducted a site visit and examined various aspects of the Barry Building. Their analysis identifies the elements of the structure(s) that are currently out of compliance with the ADA. (This report is Appendix H-5 to the DEIR.) The report identifies several instances of significant non-compliance with the ADA. For example, the second story is

currently not accessible; there is no accessible women's restroom; all doors, thresholds and landings are not sufficiently sized for wheelchair or accessibility device access which requires significant renovation to tenant spaces; and the two-lane driveway to the east does not have a legal sidewalk width. In addition, a number of other issues were identified that would require modification of the Barry Building or surrounding property.

Many of the required renovations call for costly and systematic modifications to the building components which overlap with the key character defining features and potentially overall building functionality. See pages 9-34 of the report for photographs of the identified noncompliant conditions. A total of 37 different ADA upgrades are recommended to bring the Barry Building into full ADA compliance.

These extensive renovations are required despite the fact that the building's owner has performed routine maintenance and upkeep. (See Appendix I and Appendix O of the FEIR.) The Barry Building's structural issues, including necessary seismic upgrades and ADA compliance, mean that re-occupation of the building would be an infeasibly costly effort, as discussed in Section IV below.

Reports describing the renovation work to make the Barry Building suitable for re-occupancy were included in the EIR and are listed below for reference.

- Seismic Assessment, Englekirk Structural Engineers, June 6, 2022 (DEIR Appendix G)
- Letter from Englekirk Structural Engineers regarding Two Phases of Structural Work Required by Barry Building, June 1, 2021 (DEIR Appendix H-2)
- Letter from Englekirk Structural Engineers clarifying Application of Soft Story Ordinance to Barry Building Wings, June 3, 2022 (DEIR Appendix H-3)
- Barry Building ADA Upgrade Requirements, Gruen Associates, June 2021 (DEIR Appendix H-5)

The expert opinions provided by Englekirk Structural Engineers, Gruen Associates, and Historic Resources Group as provided in the EIR regarding seismic safety, ADA upgrades, and Building Code compliance are uncontroverted. No agency, individual, or expert has challenged the scope or necessity of the renovations described for future occupancy or reuse of the building.

This extent of technical analysis was required as the application of the Soft Story Ordinance to a historic building is a unique occurrence. We reviewed a copy of the Soft Story Building inventory list obtained from DBS, and of the 12,440 buildings on that list, *only four*, including the Barry Building, are designated as HCMs. Only 0.032% of HCMs are subject to this ordinance. An order for an HCM to comply with the Soft Story Ordinance is an extremely rare situation and is not one that is widely applicable to other historic buildings. (See FEIR Appendix M.) Retrofitting and rehabilitating an HCM to comply with the Soft Story Ordinance is logistically and technically challenging, and a process that could impact the historic structure of the building if attempted. In

addition, this work would impact the availability or quality of the rentable space due to the extent of retrofitting required. For example, the recommended new shear walls may render portions of the Barry Building less rentable because of the shear wall obstruction at the storefront and office windows. Furthermore, as explained in Section IV below, it is economically infeasible in this case.

III. Environmental Review Process

In accordance with CEQA, the City prepared an EIR for the proposed demolition of the Barry Building. (The full Draft EIR and related materials are available online here: https://planning.lacity.gov/development-services/eir/11973-san-vicente-boulevard-project-0. The full Final EIR and related materials are available online here: https://planning.lacity.gov/development-services/eir/11973-san-vicente-boulevard-project-1.) An EIR is generally not required for the issuance of a demolition permit, however, in this case an EIR was prepared because the building is a designated cultural resource with the City. The Draft EIR, published in February 2023, considered the impacts of the Project (consisting solely of the demolition of the Barry Building).[6] The EIR identified a significant unavoidable impact as to historic resources.

Working with City of Los Angeles Office of Historic Resources (OHR), the EIR looked at a range of alternatives to the demolition project that would rehabilitate and preserve the Barry Building, including: a no project alternative, preservation; preservation with additional annex; and relocation. In this case, even in a "no project" scenario, significant renovations to the Barry Building are required to comply with the Soft Story Ordinance. (See DEIR, Section V for complete analysis regarding alternatives.)

1. Alternative 1 is a "No Project" alternative, which assumes the project would not be implemented and the existing building would remain on site. However, as the Barry Building is required to comply with the Soft Story Ordinance, the mandatory seismic retrofit work in the south wing is included in this alternative. In this scenario, the building would not be suitable for occupancy as structural deficiencies in other wings would remain and mandatory ADA improvements would not be made.

2. Alternative 2 is the "Preservation" alternative. In this scenario, the Soft Story seismic retrofit work *and* additional structural improvements, ADA renovations, building code, and energy efficiency upgrades would be made to the existing building.

3. Alternative 3 is the "Preservation with New Construction" alternative. In this alternative, the Barry Building would be partially preserved (and renovated for

[6] Once demolition activities are complete, the portion of the Project Site that currently contains the Barry Building would be a vacant dirt lot, and the existing surface parking lot would remain. A landscape buffer would be installed along the southern boundary of the Project Site (fronting San Vicente Boulevard). There are no plans to redevelop the site.

occupancy). A portion of the building would be demolished and a new "annex" would be built to increase leasable commercial space on the site.

4. Alternative 4 is the "Relocation" alternative. This scenario involves dismantling the building into smaller segments and transporting them onto a new location (yet to be determined).

The DEIR considered the potential impacts of each of these alternatives as compared to the project, as well as whether the alternatives would meet the Demo Permit's objectives as established by the EIR. The Lead Agency also considered whether the significant impacts of the Project would be reduced or eliminated by the proposed alternatives. The No Project alternative did not meet the Project objectives as it would leave the building vacant and a public safety hazard to the community. Alternative 4 was deemed logistically infeasible. As discussed in in Section IV of this letter below, Alternatives 2 and 3 were analyzed by experts and determined to be economically infeasible.

As part of the EIR process, numerous technical reports and analyses were prepared. The EIR included 30 appendices prepared by various experts and consultants who were engaged in the process. These reports contain more than 700 pages of supporting information regarding structural integrity, building code requirements, and historic preservation, among other topics.

In addition to the structural reports identified above, technical reports on historic resources and proposed alternatives provided as part of the EIR include the following (among others):

- Barry Building Historic Report, Historic Resources Group, November 21, 2021 (DEIR Appendix C-1)
- Potential Indirect Impacts of Demolition, Historic Resources Group, April 28, 2022 (DEIR Appendix C-2)
- Stabilization and Mothballing Outline, Historic Resources Group, June 4, 2020 (DEIR Appendix H-1)
- Phase 1 Repair Impacts Assessment, Historic Resources Group, June 22, 2021 (DEIR Appendix H-4)
- Project Impacts Assessment (Alternative 2), Historic Resources Group, October 2022 (DEIR Appendix H-7)
- Partial Demolition Alternative (Alternative 3), Historic Resources Group, November 15, 2021 (DEIR Appendix H-9)
- Barry Building Relocation Feasibility Report, Historic Resources Group, December 22, 2021 (DEIR Appendix H-12)
- Relocation Alternative Site Requirements, Historic Resources Group, November 15, 2021 (DEIR Appendix H-13)
- Memo Responding to Comment Letter, Historic Resources Group, May 11, 2023 (FEIR Appendix D)

The DEIR was made available to the public for review and comment for a 60-day public review period from February 16, 2023 to April 18, 2023. (At the request of the public the original 45-day comment period was extended.) Comments were submitted by the public during this time which the City considered and responded to. The Final EIR (or FEIR) was released on September 11, 2023. The FEIR includes responses to comments and revisions in consideration of input received on the Draft EIR.

After publication, on March 21, 2024 the Planning Department provided correspondence to DBS recommending that DBS certify the information and analysis presented in the EIR, to be considered in DBS's decision to issue or not issue the demolition permit. (See Attachment C.) On May 9, 2024, DBS issued a written request to CHC for their recommendation on adoption of an SOC.

The Applicant and the City have now spent five years on this process to consider the approval of the demolition permit, which was first requested from DBS in 2019. The City has invested considerable thought, planning, and measured consideration into the process to review and evaluate the impacts of the proposed decision.

IV. Costs & Revenue Analysis of Rehabilitation

Per the requirements of CEQA, the EIR did not consider the economic feasibility of the alternatives to preserve Barry Building. However, the Applicant commissioned detailed analysis to evaluate the cost to complete all renovations required to address the Barry Building's numerous seismic, structural, and accessibility deficiencies identified in the previously discussed reports. [7] Alternative 2 (preservation) and Alternative 3 (preservation with additional annex) were evaluated as Alternative 1 would not meet the project objectives and Alternative 4 was deemed infeasible.

Hill International prepared a Cost Report Regarding Barry Building Renovations, dated November 2, 2022. (See Attachment F.) This report estimates that the projected costs associated with implementing numerous upgrades to the Barry Building in 2022 (including seismic retrofitting and ADA and Building Code upgrades) would cost approximately $12,818,000. As the costs of construction and renovation work have continued to rise since its initial analysis, Hill International opines that the cost to complete this rehabilitation work is now $17.1 million. (See Attachment H.) From June 1, 2021, to June 26, 2024, the cost per square foot for this renovation work has risen from $777 to $1,108. This escalation is primarily driven by higher labor costs, increased material prices, and rising transportation and disposal fees.

In addition to estimating the total cost associated with renovating the Barry Building for occupancy, an additional analysis was conducted to determine the maximum revenue that would be generated from a rehabilitated Barry Building and compared that potential revenue against the

[7] This analysis was submitted to Planning in April 2023 and OHR in December 2023, included here as Attachment E.

costs of renovating and leasing the Barry Building. In March 2023, CBRE Brokerage prepared a pro forma regarding the land residual value for the Barry Building project. (See Attachment G, and explanatory analysis in Attachment E.) CBRE evaluated both Alternative 2 of the DEIR (the "Preservation Alternative") and Alternative 3 of the DEIR (the "Partial Preservation with New Construction Alternative."

Under the assumptions of Alternative 2, the annual gross rental income for the retrofitted Barry Building is estimated at approximately $736,960; the total value of the retrofitted Building is $11,361,308. Compared with the original cost estimate (plus additional expenses detailed in the pro forma) resulted in a residual land value of negative $5,663,653. Considering Hill International's updated cost figure, the value of preserving the Barry Building per Alternative 2 is now estimated at negative $9.9 million.

Alternative 3[8] also presented a negative land valuation despite the additional revenue opportunity with the expanded leasable space in this alternative. CBRE's initial analysis estimated a negative valuation of $3,733,908, and their revised cost estimate results in a land valuation of upwards of negative $12 million.

CBRE Brokerage's 2023 analysis was based on an income approach that could be derived from the Owner leasing space in the rehabilitated building. The Applicant also commissioned a 2024 Appraisal Report by CBRE Valuation based on a sales approach, which ultimately resulted in a similar finding. (Refer to Attachment I.) Under that analysis, the Barry Building Property, assuming rehabilitation of the existing building, has no market value and may even have a negative value of $ 5,672,747.

V. Benefits of the Demo Permit – Statement of Overriding Considerations

Pursuant to CEQA Guidelines Section 15093(b), a public agency or decision-maker must adopt a Statement of Overriding Considerations if significant adverse environmental effects have been identified in the EIR that cannot be substantially mitigated to an insignificant level or be eliminated. The lead agency must state in writing the reasons to support its action based on the EIR and/or other information in the record. A public agency or decision-maker may implement the project finding that on balance the benefits of the project outweigh the project's significant and

[8] Alternative 3 would preserve the south, east, and west wings of the Barry Building, the courtyard, and the south façade of the north wing, and would include the same seismic and code compliant renovations on these wings. In addition, Alternative 3 would include the construction of a new building behind (north of) the existing building (referred to as the annex). This alternative was selected to evaluate because it provides for the maximum income potential for the Property. Rising costs of construction and demolition as noted in Attachment H have resulted in the significantly more negative estimated valuation for this alternative.

unavoidable impacts. Only one benefit is required to adopt an SOC and find the project's impacts are acceptable.

The City recently adopted a template for preparing CEQA Findings and Statement of Overriding Considerations, including proffered guidance. The template notes that the overriding considerations may be based on economic, social, aesthetic, or environmental benefits provided by the project, and that the responsible agency must consider the competing public objectives of a given project. (See Attachment B.) The template further notes:

> Each of the listed project benefits set forth in this Statement of Overriding Considerations provides a separate and independent ground for the City's decision to approve the project despite the project's identified significant and unavoidable environmental impacts. Each of the following overriding consideration separately and independently (i) outweighs the adverse environmental impacts of the Project, and (ii) justifies adoption of the Project and certification of the completed EIR. In particular, achieving the underlying purpose for the Project would be sufficient to override the significant environmental impacts of the Project.

Per CEQA and the City's guidance, any single individual project benefit, separately and independently, may be sufficient grounds to adopt a SOC. Thus, only *one* project benefit is required for a decision-maker to determine the project's impacts are acceptable. Furthermore, as noted in the City's template, achieving the project's purpose is a sufficient reason to outweigh significant environmental impacts. Here, the purpose of the Demo Permit is to comply with DBS's order regarding the Soft Story Ordinance, and to abate the hazards associated with the Barry Building's current vacancy.[9] As noted previously, Alternative 1 would leave the Barry Building vacant and thus would not achieve the project objectives. Alternatives 2 and 3 are economically infeasible as outlined in the cost revenue analysis prepared by Hill International, CBRE Brokerage, and CBRE Valuation. Alternative 4 was deemed logistically and economically infeasible and would result in significant damage to the Barry Building's historic character.[10] No alternative was identified that was able to feasibly achieve the underlying purpose of the Demo Permit. First and foremost, an SOC is warranted here to move forward with the project despite the significant impacts as it is the only means by which to achieve the underlying purpose of the project. However, in addition to achieving the Project's purpose, there are numerous benefits that weigh in favor of DBS granting the Applicant a demolition permit. Each of these alone are sufficient to proceed per the CEQA Guidelines and the City's guidance.

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[9] The Demo Permit's objectives, as stated in full in the EIR (Section II.3), are as follows: 1. Comply with the City's Soft Story Retrofit Program (citation omitted), which includes complying with the requirements under LAMC Section 91.9305.2; and 2) Abate the fire, loitering, vandalism, and other public safety hazards associated with the structural defects and current vacancy of the Barry Building.

[10] See DEIR Section V for complete analysis of alternatives evaluated for the project.

a. Removal of an existing safety hazard and seismically unsafe structure.

First, the Demo Permit would remove an existing safety hazard and seismically unsafe structure in compliance with the Soft Story Ordinance. The purpose of the Soft Story Ordinance is to "to reduce structural deficiencies by the most economical and feasible method" as these vulnerable buildings may be subjected to structural failure during and/or after an earthquake.[11] As stated in Section 91.9301 of the Ordinance, its very purpose "is to promote public safety and welfare by reducing the risk of death or injury that may result from the effects of earthquakes on tilt-up concrete wall buildings designed under the building codes in effect prior to January 1, 1976. Such buildings have been categorized, based on past earthquakes, as being potentially hazardous and prone to significant damage, including possible collapse, in a moderate to major earthquake."

Also, as noted previously, this is a unique situation. While there are 12,440 buildings subject to the Soft Story Ordinance, *only four* are also designated as HCMs, including the Barry Building. Only 0.032% of the 1,181 HCM buildings have been deemed subject to the Soft Story Ordinance; this very unusual situation is not likely to set a precedent for future treatment of HCMs by DBS. (See Appendix M of the FEIR.)

b. Removal of an attractive nuisance for vandals, transient populations, loitering, and other unlawful behavior.

Second, the Demo Permit would remove an attractive nuisance for vandals, transient populations, loitering, and other unlawful behavior. The building, which is vacant and currently not suitable for occupancy has become a concern for the neighborhood. Despite best efforts at security including a locked fence, security cameras, and regular maintenance (see Appendix O of the FEIR), a break in occurred on the property in May 2024 which caused considerable damage to the Barry Building as well as collateral damage to the surrounding area. (See Attachment D.) Proceeding with the Demo Permit and demolishing the existing building would eliminate the concern for vandalism and unlawful behavior that has already occurred on the site.

c. Clear the existing property of noncompliant structures in a manner that will not preclude any future development consistent with existing zoning.

Third, the Demo Permit would clear the existing property of noncompliant structures in a manner that will not preclude any future development, thereby providing a clean slate to be utilized in a manner consistent with existing zoning. The Applicant has engaged the neighboring community to address concerns, and local residents are vastly in favor of demolishing the existing building. The Brentwood – Pacific Palisades Community Plan was last updated in 1996, and due to updated imminently. Removing this vacant structure would allow for new development with the input and feedback from local residents and neighbors.[12] Eliminating the existing non-compliant

[11] See DBS website, available here.

[12] The "project" at hand consists only of demolition of the existing Barry Building. No future project is planned at this time. The Applicant has stated under penalty of perjury as part of its application

hazardous building will make way for the possibility of new development that will contribute to the needs of the surrounding area and benefit the local community.

d. Comply with the Soft Story Ordinance, which provides for demolition at the owner's option, in the only economically feasible course of action.

Lastly, proceeding with the Demo Permit is the only economically feasible means of complying with the requirements of the Soft Story Ordinance. The Soft Story Ordinance specifically provides that in order to achieve compliance the building may be demolished "at the owner's option," (LAMC 91.9305.1.) The Code provision allowing the owner of the real property to demolish the building is in recognition of the legal principle that a government agency cannot force an owner of property to take actions that would render the owner's property to have no value. As discussed above, the cost and revenue analysis provided by experts on this issue found that preservation of the Barry Building is not economically feasible. The significant work required to retrofit the building to comply with the seismic requirements, the ADA, and the Building Code would cost dramatically more than the value of the improved building, thus resulting in a negative land valuation. This cost evaluation, initially prepared in 2022, has gotten significantly more negative as the cost of construction has risen without a corresponding increase in lease prices. New and productive use of the property cannot take place until the existing non-compliant structure is removed. The Soft Story Ordinance specifically allows for compliance to occur through demolition. (LAMC 91.9305.1.) DBS is charged with enforcing this requirement, by the most "economical and feasible method." The Applicant has requested the necessary permit from DBS within the deadline prescribed by the Ordinance in order to bring the site into compliance.

VI. Conclusion

Each and every one of these four benefits on its own is sufficient to approve the Project despite its unavoidable impact. While decision-makers must balance the environmental impacts of a project against its benefits – here – there are significant benefits to demolish the building in compliance with the Soft Story Ordinance. Demolition of the Barry Building achieves the underlying objectives of the project, and provides additional benefits that outweigh the significant impacts identified in the EIR. No alternative to the Demo Permit is economically feasible.

Based on the above benefits, it is appropriate for CHC to recommend that DBS prepare an SOC and issue the demolition permit.

Sincerely,

Edward J. Casey

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for the demolition that it has no plans to further develop the property. Rather, the Applicant intends only to dispose of the property. (See Appendix B-2 of the FEIR.)

Enclosures transferred electronically.

CC:

Melissa Jones
City Planner
melissa.jones@lacity.org

Lambert Giessinger
Senior Architect
lambert.giessinger@lacity.org

ENCLOSURES:

A. Attachment A: Draft Statement of Overriding Considerations

B. Attachment B: Planning Department Statement of Overriding Considerations Template

C. Attachment C: March 21, 2024, Letter from M. Zasadzien (City Planner) to Department of Building and Safety recommending EIR certification Letter from Planning to DBS

D. Attachment D: Photographs of May 2024 break-in at site

E. Attachment E: April 20, 2023, Letter to J. Harris (Planning Dept.) regarding Cost Analysis

    a. Note: Attachments A-E to this letter are not included here for brevity as they are also Appendices included in the DEIR. We are happy to provide these reports separately if desired.

F. Attachment F: *Barry Building Renovations* by Hill International, November 2022 (Attachment F to the Cost Analysis letter above)

G. Attachment G: *Barry Building Land Residual Analysis* by CBRE Brokerage, March 2023 (Pro forma) (Attachment G to the Cost Analysis letter above).

H. Attachment H: Revised Cost Estimate, Hill International, June 27, 2024

I. Attachment I: Revised Revenue Analysis, CBRE Valuation, July 2024

ATTACHMENT A

Statement of Overriding Considerations

The EIR identifies unavoidable significant impacts that would result from implementation of the project. PRC Section 21081 and CEQA Guidelines Section 15093(b) provide that when a decision of a public agency allows the occurrence of significant impacts that are identified in the EIR, but are not at least substantially mitigated to an insignificant level or eliminated, the lead agency must state in writing the reasons to support its action based on the EIR and/or other information in the record. The State CEQA Guidelines require, pursuant to CEQA Guidelines Section 15093(b), that the decision-maker adopt a Statement of Overriding Considerations at the time of approval of a project if it finds that significant adverse environmental effects have been identified in the EIR that cannot be substantially mitigated to an insignificant level or be eliminated. These findings and the Statement of Overriding Considerations are based on the documents and materials that constitute the record of proceedings, including, but not limited to, the Final EIR and all technical appendices attached thereto.

Based on the analysis provided in the Final EIR for the Barry Building Project, including Sections IV.B and IV.D of the Environmental Impact Analysis, of the Draft EIR, implementation of the Project would result in significant impacts that cannot be feasibly mitigated attributable to the demolition of an Historic Cultural Monument (HCM).

Accordingly, the City adopts the following Statement of Overriding Considerations. The City recognizes that significant and unavoidable impacts would result from implementation of the project. Having (i) adopted all feasible mitigation measures, (ii) rejected as infeasible the alternatives to the project discussed above, (iii) recognized all significant, unavoidable impacts, and (iv) balanced the benefits of the project against the project's significant and unavoidable impacts, the City hereby finds that each of the project's benefits listed below outweigh and override the significant unavoidable impacts relating to the demolition of an HCM.

The below stated reasons summarize the benefits, goals and objectives of the Project, and provide the detailed rationale for the benefits of the Project. These overriding considerations of economic, social, aesthetic, and environmental benefits for the Project justify adoption of the Project and certification of the completed EIR. Each of the listed project benefits set forth in this Statement of Overriding Considerations provides a separate and independent ground for the City's decision to approve the project despite the project's identified significant and unavoidable environmental impacts. Each of the following overriding consideration separately and independently (i) outweighs the adverse environmental impacts of the Project, and (ii) justifies adoption of the Project and certification of the completed EIR. In particular, achieving the underlying purpose for the Project would be sufficient to override the significant environmental impacts of the Project.

1. Removal of an existing safety hazard and seismically unsafe and noncompliant structure.
2. Removal of an attractive nuisance for vandals, transient populations, loitering, and other unlawful behavior.
3. Clear the existing property of noncompliant structures in a manner that will not preclude any future development consistent with existing zoning.
4. Comply with the Soft Story Ordinance, which provides for demolition at the owner's option, within the time limits as specified in the Ordinance, in the only economically feasible course of action. (LAMC 91.9305.1.)

ATTACHMENT B

XII. Statement of Overriding Considerations (*if applicable*)

The EIR identifies unavoidable significant impacts that would result from implementation of the project. PRC Section 21081 and CEQA Guidelines Section 15093(b) provide that when a decision of a public agency allows the occurrence of significant impacts that are identified in the EIR, but are not at least substantially mitigated to an insignificant level or eliminated, the lead agency must state in writing the reasons to support its action based on the EIR and/or other information in the record. The State CEQA Guidelines require, pursuant to CEQA Guidelines Section 15093(b), that the decision-maker adopt a Statement of Overriding Considerations at the time of approval of a project if it finds that significant adverse environmental effects have been identified in the EIR that cannot be substantially mitigated to an insignificant level or be eliminated. These findings and the Statement of Overriding Considerations are based on the documents and materials that constitute the record of proceedings, including, but not limited to, the Final EIR and all technical appendices attached thereto.

Based on the analysis provided in Section XX, Environmental Impact Analysis, of the Draft EIR, implementation of the Project would result in significant impacts that cannot be feasibly mitigated with respect to: XXX.

Accordingly, the City adopts the following Statement of Overriding Considerations. The City recognizes that significant and unavoidable impacts would result from implementation of the project. Having (i) adopted all feasible mitigation measures, (ii) rejected as infeasible the alternatives to the project discussed above, (iii) recognized all significant, unavoidable impacts, and (iv) balanced the benefits of the project against the project's significant and unavoidable impacts, the City hereby finds that each of the project's benefits, as listed below, outweigh and override the significant unavoidable impacts relating to [insert impacts].

The below stated reasons summarize the benefits, goals and objectives of the Project, and provide the detailed rationale for the benefits of the Project. These overriding considerations of economic, social, aesthetic, and environmental benefits for the Project justify adoption of the Project and certification of the completed EIR. Each of the listed project benefits set forth in this Statement of Overriding Considerations provides a separate and independent ground for the City's decision to approve the project despite the project's identified significant and unavoidable environmental impacts. Each of the following overriding consideration separately and independently (i) outweighs the adverse environmental impacts of the Project, and (ii) justifies adoption of the Project and certification of the completed EIR. In particular, achieving the underlying purpose for the Project would be sufficient to override the significant environmental impacts of the Project.

- XX
- XX

(*GUIDANCE: The responsible agency shall prepare a statement of overriding considerations which reflects the ultimate balancing of competing public objectives (including environmental, legal, technical, social, and economic factors. This must state specific reasons supporting the action based on the FEIR or other substantial evidence in the record, including facrs, reasonable assumptions based on facts, and expert opinions supported by facts. This is NOT simply a restatement of the Prcject Objectives. EG. Specific benefits such as environmental/sustainability, smart growth, community/public benefits, policy support, housing goals, employment/tax revenue specifics, etc.*)

ATTACHMENT C

FORM GEN. 160 (Rev. 6-80)

CITY OF LOS ANGELES
INTER-DEPARTMENTAL CORRESPONDENCE

DATE: March 21, 2024

TO: Osama Younan, General Manager
Frank Lara, Director
Department of Building and Safety

FROM: Milena Zasadzien
Principal City Planner
Department of City Planning

SUBJECT: **PROPOSED DEMOLITION OF BARRY BUILDING, 11973 SAN VICENTE BLVD**

In 2007, the Los Angeles City Council adopted the City of Los Angeles Cultural Heritage Commission's (CHC's) recommendation to designate the Barry Building, located at 11973-11975 San Vicente Boulevard (Project Site), as Historical-Cultural Monument (HCM) No. LA-887. In 2019, the property owner of the Barry Building applied for permits to demolish the building, with no further plans for development of the Project Site. The City of Los Angeles has codified two separate processes for consideration of the issuance of demolition permits for HCMs, such as the Barry Building. One of the processes is codified in Los Angeles Municipal Code (LAMC) Section 91.106.4.5 and is administered by the Los Angeles Department of Building and Safety (DBS) (DBS Process). The other process is codified in Los Angeles Administrative Code (LAAC) Sections 22.171.14 and 22.171.15 and involves the CHC and potentially the City Council (CHC Process). Both processes require compliance with the California Environmental Quality Act (CEQA). As the Barry Building has been designated as an HCM, it is considered a Historical Resource under CEQA Guidelines, Section 15064.5(a)(2). Demolition of a Historical Resource would cause an unavoidable substantial adverse change in the environment requiring preparation of an Environmental Impact Report (EIR). As such, an EIR has been prepared by the Department of City Planning (DCP), in accordance with CEQA, to serve as an informational document for public agency decision-makers and the general public regarding the objectives and environmental impacts of the demolition of the Barry Building. This memo serves to provide information to DBS related to the certification of the EIR.

PROJECT DESCRIPTION:

The 11973 San Vicente Boulevard Project (Project) consists of demolition of the existing two-story commercial building, commonly referred to as the Barry Building. The existing building is an HCM that has been vacant and fenced since 2017. Once demolition activities are complete, the portion of the Project Site that currently contains the Barry Building would be a vacant lot, and the existing surface parking lot would remain. A landscaped buffer would be installed along the southern boundary of the Project Site (fronting San Vicente Boulevard). No future development of the Project Site is proposed or considered as part of the Project.

ENVIRONMENTAL IMPACT REPORT:

The City of Los Angeles (City), as Lead Agency, has evaluated the environmental impacts of implementation of the Project by preparing an EIR (Case No. ENV-2019-6645-EIR/State Clearinghouse No. 2020110210). The EIR was prepared in compliance with the California Environmental Quality Act of 1970 (CEQA), Public Resources Code (PRC) Section 21000 et seq. and the California Code of Regulations Title 15, Chapter 6 (CEQA Guidelines).

CEQA Section 21002 provides that “public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the

significant environmental effects of such projects[.]" The procedures required by CEQA "are intended to assist public agencies in systematically identifying both the significant effects of proposed projects and the feasible alternatives or feasible mitigation measures which will avoid or substantially lessen such significant effects." CEQA Section 21002 goes on to state that "in the event [that] specific economic, social, or other conditions make infeasible such project alternatives or such mitigation measures, individual projects may be approved in spite of one or more significant effects thereof."

The mandate and principles announced in CEQA Section 21002 are implemented, in part, through the requirement that agencies must adopt findings before approving projects for which EIRs are required. (See CEQA Section 21081[a]; CEQA Guidelines Section 15091[a].) For each significant environmental impact identified in an EIR for a proposed project, the approving agency must issue a written finding, based on substantial evidence in light of the whole record, reaching one or more of the three possible findings, as follows:

1) Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the significant impacts as identified in the EIR.

2) Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been, or can or should be, adopted by that other agency.

3) Specific economic, legal, social, technological, other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the EIR.

With respect to a project for which significant impacts are not avoided or substantially lessened either through the adoption of feasible mitigation measures or feasible environmentally superior alternatives, a public agency, after adopting proper findings based on substantial evidence, may nevertheless approve the project if the agency first adopts a statement of overriding considerations setting forth the specific reasons why the agency found that the project's benefits rendered acceptable its unavoidable adverse environmental effects. (See CEQA Guidelines Sections 15093 and 15043[b]; and CEQA Section 21081[b].)

PROCEDURE UNDER THE CITY'S BUILDING REGULATIONS:

The Building Code's procedure for the approval of a demolition permit to demolish an HCM is set forth in LAMC Section 91.106.4.5. The EIR prepared for the Project has been completed in compliance with CEQA, and therefore DCP recommends that DBS certify the information and analysis presented in the EIR. The EIR concluded that the demolition of the Barry Building would result in significant and unavoidable historic resource impacts to the HCM. Pursuant to LAMC Section 91.106.4.5, if the CEQA Initial Study and Check List determines the building or structure meeting the requirements is "significant," DBS shall not issue the permit to demolish, alter, or remove the building or structure without first finding that specific economic, social, or other considerations make infeasible the preservation of the building or structure. DBS's determination to either issue or not issue a demolition permit is appealable to the Board of Building & Safety Commissioners (Board), pursuant to LAMC Section 98.0403.1(b)(2). In addition, the decision of the Board to certify an EIR, adopt a negative declaration or mitigated negative declaration or determine, in writing, that a project is not subject to CEQA, is appealable to the City Council pursuant to LAMC Section 197.01.

CEQA Environmental Findings in accordance with the requirements listed above, to either issue or not issue demolition permits for the Project, have <u>not</u> yet been prepared and are not being presented at this time. DCP recommends that DBS certify the information and analysis presented in the EIR, which may then be considered in DBS's decision to issue or not issue the demolition permit.

RECOMMENDED ACTIONS:

Certify that the following:

1. The 11973 San Vicente Boulevard Project Final EIR has been completed in compliance with the California Environmental Quality Act (CEQA);

2. The 11973 San Vicente Boulevard Project Final EIR was presented to the Department of Building and Safety (DBS) as a decision-making body of the lead agency and DBS reviewed and considered the information contained in the EIR prior to approving the project; and

3. The 11973 San Vicente Boulevard Project Final EIR reflects the independent judgment and analysis of the lead agency.

Regarding DBS's decision to issue or not issue the demolition permit, in the event that a demolition permit is issued by DBS, additional CEQA actions on the Project would need to occur, including the adoption of Environmental Findings, a Statement of Overriding Considerations, and a Mitigation Monitoring Program.

VINCENT P. BERTONI, AICP
Director of Planning

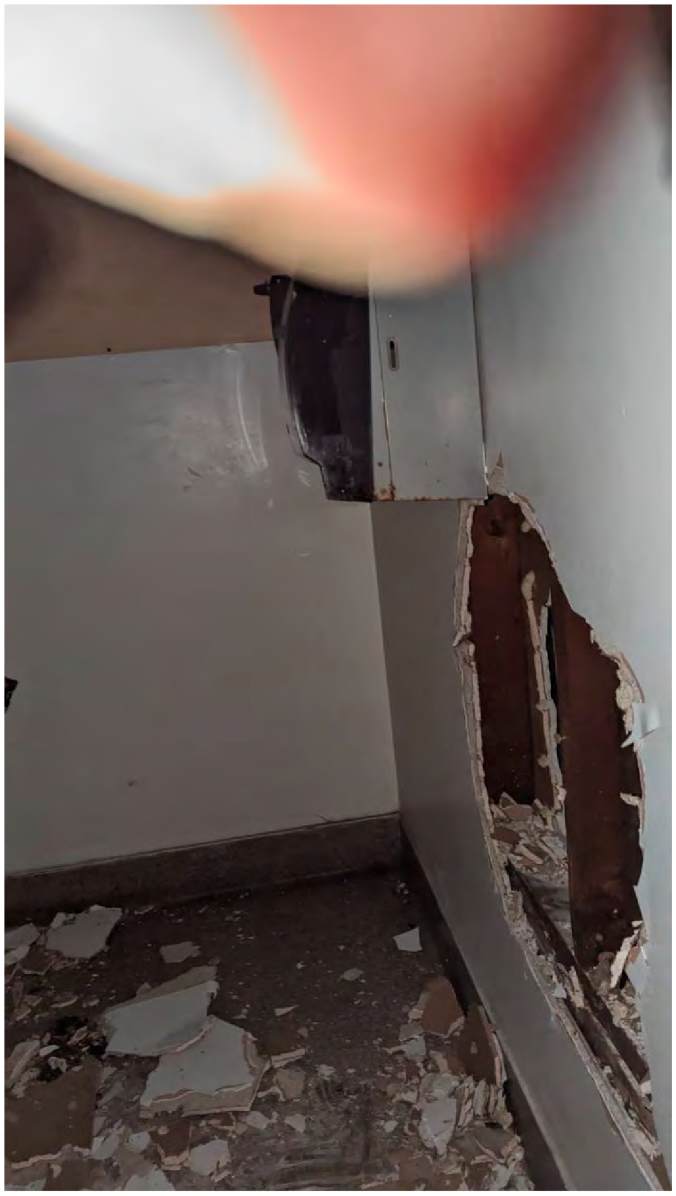
Milena Zasadzien
Principal City Planner
Milena.Zasadzien@lacity.org
213-847-3636

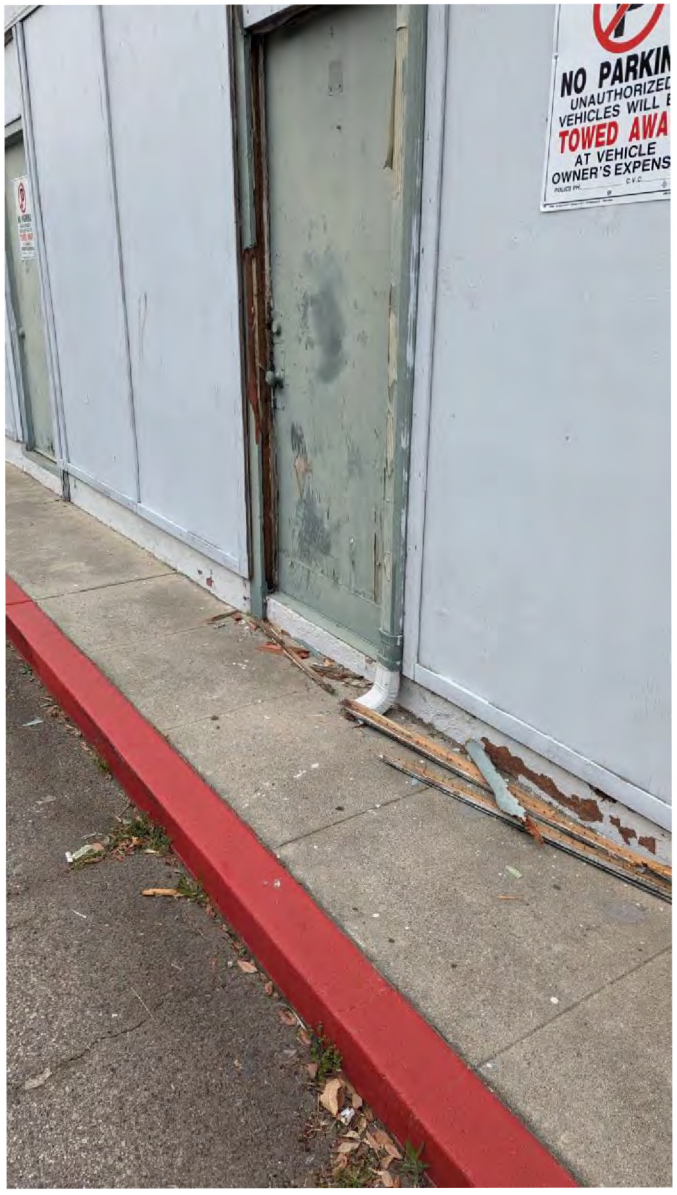
Mindy Nguyen
Senior City Planner

ATTACHMENT D

Photographs of May 2024 Break-in at Barry Building (taken by Property Manager)



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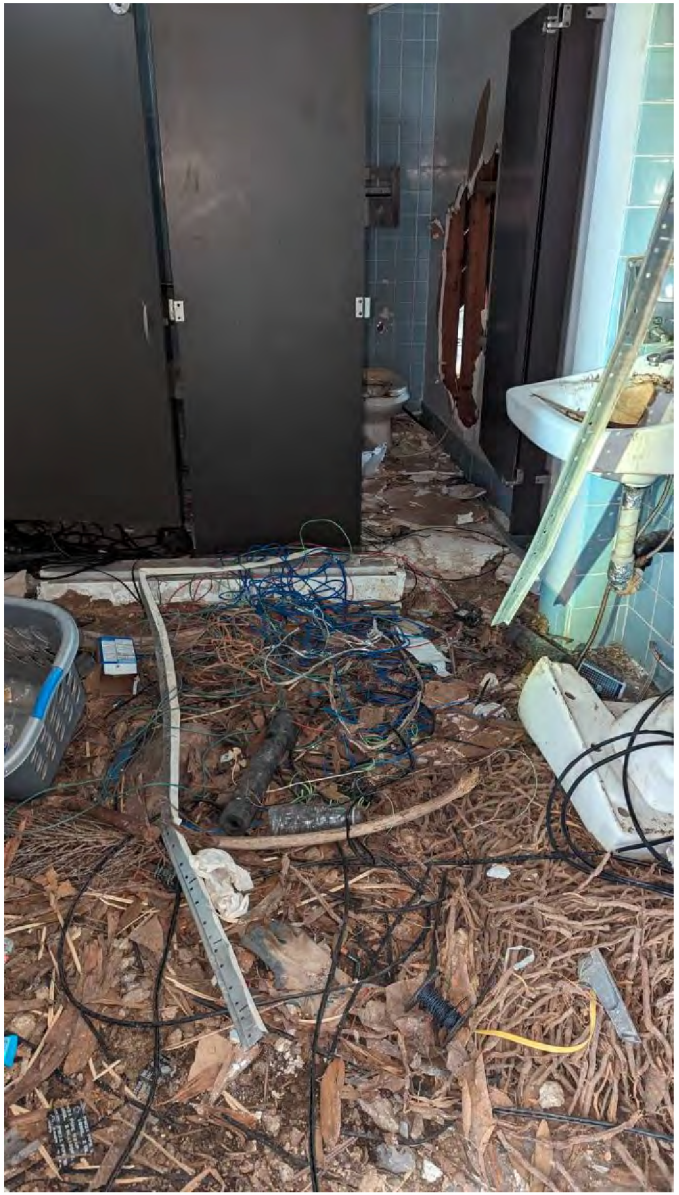

ATTACHMENT E

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Edward J. Casey Direct Dial: **+1 213 576 1005** Email: **ed.casey@alston.com**

Via Overnight Mail

April 20, 2023

James Harris
Los Angeles City Planning
221 N. Figueroa Street, Suite 1350
Los Angeles, CA 90012
(213) 978-1241
james.harris@lacity.org

Re: 11973 San Vicente Boulevard Project / ENV-2019-6645-EIR / State Clearinghouse No. 2020110210

Dear Mr. Harris,

This firm represents the Project Applicant in the above-referenced matter. In accordance with the California Environmental Quality Act (CEQA), the City of Los Angeles (City), as Lead Agency, has prepared a Draft Environmental Impact Report (DEIR) for the proposed demolition of the building (Barry Building) located at 11973 San Vicente Boulevard Project (Project). We are enclosing additional memoranda regarding the cost of rehabilitating the Barry Building property located at 11973 San Vicente Boulevard, Los Angeles, California (Property) in the manner described in Alternatives 2 and 3 in the DEIR.

The City, as the lead agency under CEQA for the Project, is not required to report detailed information on financial considerations. Accordingly, the Project Applicant is providing technical analyses as to the rehabilitation costs in an effort to provide full disclosure regarding the current status of the Barry Building. This is not a "comment letter" on the DEIR and thus requires no response in the Final EIR to be prepared by the City as the lead agency. Rather, since the DEIR has properly excluded certain financial considerations, additional information on economic feasibility is provided for inclusion in the administrative record.

The following memoranda are attached to this letter and are summarized below.

1. *11971 San Vicente Boulevard – Retrofit Schemes* by Englekirk Structural Engineers (June 2021) (Soft Story Retrofit Letter Report) (Attachment A to this letter);
2. *11971 San Vicente Boulevard – Retrofit Schemes* by Englekirk Structural Engineers (June 2022) (Attachment B to this letter);
3. *11973 San Vicente Boulevard, ASCE 41-13 Seismic Assessment* by Englekirk Structural Engineers (June 2022) (Attachment C to this letter);
4. *Project Impacts Assessment, 11973 San Vicente Boulevard* by Historic Resources Group (October 2022) (Attachment D to this letter);
5. *Barry Building ADA Update Requirements* by Gruen Associates (June 2021) (Attachment E to this letter);
6. *Barry Building Renovations* by Hill International (November 2022) (Attachment F to this letter); and
7. *Barry Building Land Residual Analysis* by CBRE, Inc. (March 2023) (Pro forma) (Attachment G to this letter).

The Barry Building is currently seismically unsound for occupancy. On October 21, 2014, the property was inspected by the City of Los Angeles Department of Building and Safety. Based on their inspection of the Property, the Department determined that the Barry Building falls within the scope of Division 93, Article I, Chapter IX of the Los Angeles Municipal Code (LAMC § 91.9300 et seq.), titled Mandatory Earthquake Hazard Reduction in Existing Wood Frame Buildings with Soft, Weak or Open Front Walls (Soft Story Ordinance). As a result, the Barry Building is required to meet the minimum seismic standards outlined in the Soft Story Ordinance through either seismic retrofit of the Building or demolition.

A voluntary seismic evaluation was completed to determine the safety of the Barry Building outside of the requirements of the Soft Story Ordinance (which applies only to the South Wing of the Barry Building). The evaluation conducted by Englekirk Structural Engineers (discussed in detail below and attached herein as Attachments B and C) determined that that even with the implementation of a structural retrofit pursuant to the Soft Story Ordinance, the remaining building wings would not be structurally sufficient to protect building occupants if the building was subject to a moderate to severe seismic event. Englekirk's assessment determined that the wings *not* subject to the Soft Story Ordinance were currently 190 to 650% overstressed.

Englekirk noted that the building is a historic building and thus is subject to the 2016 California Historical Building Code. Although the California Historical Building Code allows an analysis and retrofit to meet 75% of the current building code forces, based on the level of overstress, Englekirk determined that the same retrofit recommendations should apply.

Thus, in addition to the retrofitting required under the Soft Story Ordinance, if efforts were undertaken to retrofit the Barry Building in an attempt to make it safe for occupancy, additional structural retrofit requirements would be needed on the rest of the Building to address the other identified structural deficiencies and ensure the Barry Building is sufficiently sound to protect building occupants (and pedestrians) in the event of a moderate to severe seismic event.

Furthermore, given the date it was constructed, the Barry Building is currently not in compliance with the Americans with Disabilities Act (ADA) and requires significant renovations to provide even the most basic amenities under the ADA. For example, there is currently no women's restroom on the ground floor; the only women's restroom in the Barry Building is on the second story, which is only accessible by stairs. These and other renovations must be made for the Barry Building to meet the requirements of the ADA and to be suitable for public use. Additional renovations are also required for the existing structure to meet certain provisions of the Building Code.

Collectively, the above-referenced reports found that extensive modifications are required to renovate the Barry Building to meet minimum standards for safety and accessibility, costing approximately $12,818,000. In addition, these upgrades could destroy some historic materials and features that characterize the property and permanently alter the essential form and integrity of the Barry Building.

In addition, a pro forma analyzed the expected value of the land and rental income based on the current real estate market and the costs to complete necessary renovations. This analysis found that the value of the land (assuming rental of the Barry Building) after completing all the necessary costs would be approximately negative $5,663,653. The total cost of preservation and renovation of the Barry Building, even where leasable space is maximized, is significantly greater than value of the renovated Property. Therefore, rehabilitating the Barry Building is not an economically feasible alternative to demolition.

I. Required Structural Upgrades

The Barry Building is currently seismically unsound and is not suitable for occupancy without significant structural improvements. On October 21, 2014, the property was inspected by the City of Los Angeles Department of Building and Safety. The Department determined that based on its inspection of the Building, the Barry Building falls within the scope of Division 93, Article I, Chapter IX of the Los Angeles Municipal Code (LAMC § 91.9300 et seq.), *Mandatory Earthquake Hazard Reduction in Existing Wood Frame Buildings with Scft, Weak or Cpen Front Walls* (the "Soft Story Ordinance"). As a result of its current noncompliance, the Barry Building is required to either undergo seismic retrofitting or demolition in order to meet the minimum seismic standards outlined in the Soft Story Ordinance. The work required to comply with this Ordinance is discussed in Englekirk Structural Engineers' Soft Story Retrofit Letter Report (Attachment A to this letter).

Separate from the retrofitting required under the Soft Story Ordinance (which applies to the south wing of the Barry Building), additional renovations are needed on the north, east, and west wings in order to address other (non-soft story) structural deficiencies if efforts were undertaken to make the Barry Building safe for occupancy. This is noted in the second memorandum prepared by Englekirk Structural Engineers (Attachment B to this letter). The third memorandum (Attachment C to this letter) details the additional renovations that are required to address the entire Building's structural deficiencies and necessary upgrades to ensure the Barry Building is sufficiently sound to protect building occupants and pedestrians in the event of a moderate to severe seismic event. All three memoranda regarding the Barry Building's seismic and structural deficiencies are summarized below.

In addition to the required seismic renovations, additional work is needed to bring the existing Building into compliance with the ADA and the Building Code. These upgrades are detailed in a report prepared by Gruen Associates (Attachment E to this letter).[1]

1. *11971 San Vicente Boulevard – Retrofit Schemes* (Soft Story Retrofit Letter Report), Englekirk Structural Engineers (June 2021)

This report provides a structural analysis identifying the work necessary to repair the Barry Building to conform to the City of Los Angeles Soft Story Ordinance. The Soft Story Ordinance applies only to the Barry Building's south wing (the only wing with a "soft story").

The report identifies a seismic retrofit solution that addresses the south wing portion only. The seismic retrofit scheme (referred to as Phase I) consists of steel moment frame structures that are located within the Barry Building and are supported on new concrete footings. These steel moment frame structures provide lateral bracing for the south wing. In addition, there would be new wood shear walls installed to minimize architectural impact on the Barry Building. This scheme is depicted in the sketches attached to this report on pages 3-8.

In addition, Phase II of the retrofit work identifies structural work that is needed beyond the Phase I work described above. This work includes the work to the north, east and west wings that are not retrofitted in the Phase I Soft Story scheme. This includes new

[1] The Barry Building is a designated by the City of Los Angeles as Historic-Cultural Monument. Historic Resources Group considered the voluntary seismic retrofits proposed by Englekirk Structural Engineers and the ADA upgrades recommended by Gruen Associates (both discussed above). It is important to note that Historic Resources Group found that the proposed structural upgrades would destroy some historic materials and features that characterize the property and permanently alter the essential form and integrity of the Barry Building. However, the renovations could still meet standards for rehabilitation of historic buildings. This report is provided as Appendix H-7 to the DEIR and Attachment D to this letter.

and strengthened wood shear walls, new foundations to support the seismic loads resisted by the new shear walls, and adding and strengthening the first floor, second floor, and roof diaphragms. This work is explained in additional detail in *ASCE 41-13 Seismic Assessment*, Englekirk (June 2022) discussed below.

(This report is provided as Appendix H-2 to the DEIR and at Attachment A to this letter.).

2. *11971 San Vicente Boulevard – Retrofit Schemes (Soft Story Memorandum)*, Englekirk Structural Engineers (Rev. June 2022)

This letter explains that the soft story structural retrofit (Phase I work identified above) addresses only the structural deficiencies in the Barry Building's south wing. The Soft Story Ordinance is limited to this Building portion because there is no ascertainable lateral system (commonly referred to a "soft story") and the second and roof levels are not supported on the ground level isolated steel columns. The Soft Story Ordinance does not apply to the remaining wings because they do not have a "soft story." Thus, even with the implementation of the Soft Story Ordinance structural retrofit, the remaining Building wings would not be structurally retrofitted and would not be sufficient to protect building occupants or pedestrians if the Barry Building was subject to a moderate to severe seismic event.

(This letter is provided as Appendix H-3 to the DEIR and at Attachment B to this letter.)

3. *11973 San Vicente Boulevard ASCE 41-13 Seismic Assessment*, Englekirk Structural Engineers (June 2022)

Englekirk Structural Engineer's analysis found that the Barry Building's seismic force resisting system is generally highly overstressed. As a result, their report proposes seismic retrofit upgrades to address structural deficiencies in the Barry Building. The report notes several structural deficiencies in the Barry Building. For example, (1) interior demising walls do not form a complete seismic-force-resisting system or a complete lateral bracing system; (2) vertical elements of the seismic-force-resisting system are discontinuous between floors; (3) the north, east, and west wings range from being 190% - 650% overstressed; (4) the steel posts in the south wing do not possess any lateral resistance, so a possible collapse of this wing could result during a seismic event; (5) there is no existing wall or lateral resisting element to resist seismic loads in the south wing, so significant lateral displacement may be expected during a seismic event; and (6) the demand over capacity ratios for the typical diaphragm at the roof and second floor is highly overstressed.

To conform the seismic force resisting requirements, Englekirk identified a seismic retrofit scheme that would include: strengthening the existing walls, adding new 2-story shear walls, and adding new steel moment frames. (A figure depicting a conceptual scheme for the new shear wall and moment frame locations is included as Figure 7.1 on page 11 of the report.) Specifically, this work would include:

A. Strengthening the existing shear walls would include adding new plywood sheathing and nailing to existing framing; adding new hold-down anchors at each end of each wall and new floor-to-wall connections; and enhancing existing footings or adding new footings. These include exterior and interior walls of the north, east and west wings.

B. Strengthening the existing shear walls would include adding new plywood sheathing and nailing to existing framing; adding new hold-down anchors at each end of each wall and new floor-to-wall connections; and enhancing existing footings or adding new footings. These include exterior and interior walls of the north, east and west wings.

C. New floor and roof diaphragm sheathing would include the addition of new 3/4" plywood sheathing over the entirety of the existing floor and roof sheathing.

D. New two-story steel moment resisting frames would be constructed at the south wing.

While efforts would be made to preserve the historic fabric of the Barry Building where possible, these renovations, may impact the availability or quality of the rentable space. For example, the recommended new shear walls may render portions of the Barry Building less rentable because of the shear wall obstruction at the storefront and office windows. As noted previously, although the California Historical Building Code allows an analysis and retrofit to meet 75% of the current building code forces, based on the Barry Building's current level of overstress, Englekirk determined that the same retrofit recommendations should apply.

The scope of work considered by this report does not include additional required improvements related to Building Code, ADA compliance, plumbing, mechanical, and lighting upgrades.

(This report is included as Appendix G to the DEIR and at Attachment C to this letter.)

4. *Barry Building ADA Upgrade Requirements*, Gruen Associates (June 2021)

This report evaluates the Barry Building's compliance with the Americans with Disabilities Act (ADA). Gruen Associates conducted a site visit and examined various aspects of the Barry Building. Their analysis identifies the elements of the structure(s) are currently not in compliance with the ADA.

The report identifies several instances of significant non-compliance with the ADA. For example, the second story is currently not accessible; there is no women's restroom on the ground floor, the only women's room is on the second story which is not accessible; all

doors, thresholds and landings are not sufficiently sized for wheelchair or accessibility device access which requires significant renovation to tenant spaces; and the two-lane driveway to the east does not have a legal sidewalk width.

A number of other issues were identified that would require modification of the Barry Building or property. Among other deficiencies, there is no passenger drop-off or a loading zone provided at the street or along the alley; the parking layout is not compliant and does not include the required number of accessible stalls; and the parking lot needs to be re-paved at the ADA stalls to ensure floor levelness all the way to the Building's entries.

Some of the illustrated noncompliant conditions may have more than one solution. For example, there are different types or locations of an elevator that could be installed to the second story accessible. Many conditions, however, call for costly and systematic modifications to the building components which overlap with the key character defining features and potentially overall building functionality. See pages 9-34 of the report for photographs of the identified noncompliant conditions.

Some of the upgrades recommended to bring the Barry Building into compliance include:

A. Accessible path of travel improvements, such as new compliant parking, paving, layout, stalls and signage; widening the sidewalk along the east façade[2]; modification or replacement of exterior doors on the east façade; addition of a floor-mounted handrail on the courtyard steps; addition of a curb to the courtyard ramp; addition of a rail or landscape element as a barrier to the underside of the stairs;

B. Plumbing improvements, such as upgrading the first-floor men's room and second-floor women's room to compliance; addition of single unisex restrooms on both floors; code-compliant signage; and installation of an ADA-compliant drinking fountain;

C. Stair and balcony railing improvements, such as the addition of solid or perforated panels to the floating stair risers; contrasting stripes at each tread; replacement of existing stair handrails and balcony guardrails with new handrails at code-compliant height; and addition of wall-mounted handrails at each of the four stairs between the second floor levels;

[2] The existing driveway, to which alternation is suggested to accommodate a wider sideway is under shared ownership with another building. Consent of the building's owner would be required to make this accommodation. As a result, a waiver of the sideway width would likely be required (and may necessitate input from the Fire Marshall). If the waiver is not granted, some tenant spaces will require two doors opening into the patio which would negatively impact window space. See pages 1-2.

D. Vertical transportation improvements, such as addition of elevators and/or lifts to provide access to the second floor; and addition of two exterior areas of assisted rescue on the second-floor balcony; and

E. Tenant space improvements, such as widening all tenant doorways; modifying interior doors, landings and steps; providing code-compliant entry signage; replacement of all door hardware with lever-type; relocation of hardware mounted outside required range; modification of 9" bottom rails on glazed doors; removal and infill of mails slots in doors; relocation of all switches and outlets mounted outside required range; and modification or replacement of at least one window in each unit with operating parts within the required range.

A total of 37 different ADA upgrades are recommended to bring the Barry Building into full ADA compliance.[3]

(This report is also included as Appendix H-5 to the DEIR and Attachment E to this letter.)

II. Cost Analysis of Structural Upgrades

An additional memorandum was prepared to analyze and develop a comprehensive estimate of the cost to complete all renovations required to address the Barry Building's numerous seismic, structural, and accessibility deficiencies identified in the previously discussed reports.

1. *Barry Building Renovations*, Hill International (November 2022)

Attachment F to this letter contains a Cost Report Regarding Barry Building Renovations, prepared by Hill International on November 2, 2022. This report estimates that the projected costs associated with implementing numerous upgrades to the Barry Building (including seismic retrofitting and ADA and Building Code upgrades) would cost approximately $12,818,000.[4]

The cost estimate in this report reflects the findings contained in the following reports (discussed above): *11973 San Vicente Boulevard, ASCE 41-13 Seismic Assessment* by Englekirk Structural Engineers; *Project Impacts Assessment, 11973 San Vicente Boulevard* by Historic Resources Group; *Barry Building ADA Update Requirements* by Gruen Associates; and a site visit completed by the report's author.

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[3] The authority having jurisdiction (AHJ) over any renovation project (including a fire official and ADA Plan Checker) may need to identify compromises in the event that an ADA requirement conflicts with the Barry Building's historic character or other Building Code requirement.

[4] This is likely a conservative estimate, Hill International estimates that construction costs have risen since this estimate was prepared in November 2022.

The data from these reports was used to develop an estimate of the full scope of work required to complete the necessary renovations. The construction items were then priced and totaled using cost metrics as of November 2022.

This report estimates the cost of three categories of construction improvements to the Barry Building: (1) Structural and Life Safety & Building Code Compliance, (2) ADA Access, and (3) Energy and Water Conservation. The report contains two attachments, the first contains estimate supporting documentation. These three tables provide cost details regarding each item of work identified. The second attachment is a repair matrix which identifies the scope of the major categories of work required, and where additional costs may occur. (For example, repairing a sewer line may require work on the existing courtyard concrete.)

The Structural and Life Safety & Building Code Compliance scope of work includes: (1) abatement; (2) structural upgrades; (3) upgrades to steel stairs and railings; (4) fire protection; (5) replacement of HVAC System; and (6) electrical system upgrade.

The ADA Access scope of work includes: (1) development of ramps at second floor walkways and upgrades to railings; (2) replacing doors to increase width to code minimum; (3) upgrading the parking lot to meet ADA requirements; (4) installing an elevator for second floor access; (5) widening the east elevation sidewalk; and (6) realigning restrooms on the first and second floor to meet ADA requirements.

The Energy and Water Conservation scope of work includes: (1) replacing all windows with dual glazed Low E glass; (2) replacing the HVAC system with an energy efficient system; (3) diverting storm water to the storm drain system; and (4) replacing lighting with LED fixtures.

The cost calculation assumed that all minimum code requirements will be met.[5] The necessary renovations to complete the established scope of work are itemized in the three tables included as Attachment 1 to this report. The first table, located on page 9 of the report, identifies the project subtotals for work as divided into 9 subcategories. The second table, spanning pages 10-12 contains an itemized list of each task and required materials to complete the renovations. Finally, table 3 provides a detailed cost estimate for each of the itemized task items on table 2, including required hours per unit, total hours, and cost per square foot. (See table 3 on pages 13-31.)

[5] While it is possible that some of the items estimated could get a waiver from one agency, it is unlikely that all agencies will agree to any specific item. There are some areas where ADA compliance may conflict with other building requirements. For example, the ADA report recommends widening of the East Sidewalk to 5 feet. However, this change would reduce the access drive width. This creates a conflict between the minimum roadway requirement and the ADA sidewalk width requirement. One of the controlling agencies will be required to waive the code requirement to achieve compliance.

As noted in the reports above, a number of major renovations are required to bring the Barry Building into compliance with the ADA, the Building Code, and to ensure the Building is safe for occupancy. For example, the structural work required (including seismic upgrades) would cost approximately $4.5 million; bringing tenant spaces into compliance (including modifying doorways and windows) would cost approximately $2 million; abatement of asbestos, lead paint and other hazardous materials would cost $1.5 million; and installing an elevator to make the second story accessible per the ADA would cost approximately $850,000. (See page 9 for all subtotals.) **The total projected cost for these and the other identified required improvements is $12,818,000**.[6]

III. Revenue Analysis

In addition to estimating the total cost associated with renovating the Barry Building for occupancy, an additional analysis was conducted to determine the maximum revenue that would be generated from a rehabilitated Barry Building and compared that potential revenue against the costs of renovating and leasing the Barry Building.

2. Barry Building Land Residual Analysis, CBRE, Inc. (March 2023)

CBRE prepared a pro forma regarding the land residual value for the Barry Building project, provided here as Attachment G. "Residual land value" is a method for calculating the value of development land. In general terms, residual land value is determined by subtracting all of the expenses and costs associated with an improvement project from the total value of the improved property (referred to as "Gross Development Value" or GDV).[7] Gross development value estimates the value of the property upon completion and lease of a completed project. This is an estimate of what a property will be worth upon refinance or re-sale.

First, CBRE evaluated Alternative 2 of the DEIR (the "Preservation Alternative" or *Land Residual Analysis (Remodel)*), which would involve seismic retrofitting of the existing Barry Building, and the ADA upgrades and Building Code compliance renovations identified in the Hill International Report (Attachment F, discussed above). This alternative estimates a total of an approximate 12,800 square feet of retail uses (and includes some common areas like bathrooms).

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[6] This estimate does *not* take into consideration legal fees, finance costs, or tenant improvements. Hill International's estimate considers approximately 12,800 square feet of leasable space as identified in the DEIR, plus an additional 1,156 square feet of restrooms, mechanical / electric spaces and 1,478 of common spaces including an elevated walkway, main breezeway, and back breezeway into the courtyard which would also require some renovation under the ADA and/or Building Code. The total square footage considered is 15,434. See page 8 of Attachment F.

[7] This is done by subtracting from the total value of a development, all costs associated with the development, including profit but excluding the cost of the land.

To perform the land residual analysis, CBRE analyzed the costs of construction as of November 2022, and evaluated office, retail, and land sale comparable data (or "comps") to the Barry Building and the costs associated with necessary renovations per the Hill International Report. This data is included with the attached pro forma. CBRE was able to estimate the annual projected rent for the renovated Building (assuming ADA, seismic, and Building Code compliance as discussed above). Under the assumptions of Alternative 2, the annual gross rental income for the retrofitted Barry Building is estimated at approximately $736,960; the total value of the retrofitted Building is $11,361,308.

To determine the residual land value, expenses and costs associated with construction are totaled, and then the full suite of costs is subtracted from the Gross Development Value of $11,361,308. In addition to the $12,818,000 estimated cost to complete necessary renovations (per Hill International, discussed above), leasing commissions, costs for improvements to the leased spaces ("Tenant Improvement Allowance"), transfer taxes and developer profit were considered.[8] Total costs of Alternative 2 are estimated at $17,024,961. Note that some costs associated with the development, property taxes, insurance, and certain maintenance fees are reimbursed by building tenants, and thus are not included. (These reimbursable expenses are tabulated on page 3 of Attachment G.)

Thus, preserving the Barry Building per Alternative 2, the residual land value is $11,361,308 minus $17,024,961, or negative $5,663,653. This proposed project alternative returns a negative valuation. That is, the total costs of the necessary renovations and preparing the Barry Building for lease are greater than the value of the renovated property.

In addition, CBRE prepared a pro forma valuation based on Alternative 3 of the DEIR (the "Partial Preservation with New Construction Alternative" or *Land Residual Analysis (Remodel + Annex)*), which would involve renovation and preservation of most of the existing Building and construct an additional annex on the on the remaining portion of the Project Site. As explained in the Alternatives Section of the DEIR, Alternative 3 would preserve the south, east, and west wings of the Barry Building, the courtyard, and the south façade of the north wing, and would include the seismic retrofit, ADA upgrades, Building Code compliance, and energy efficiency upgrades. In addition, Alternative 3 would include the construction of a new building behind (north of) the existing building (referred to as the annex). To accommodate the new construction, Alternative 3 would involve demolition of the building volume behind the south façade of the north wing (approximately 25% of the existing building's square footage). This alternative was selected to evaluate because of all of the alternatives that include preservation of the existing Barry Building, it provides for the maximum income potential for the Property. In total, Alternative 3 would include approximately 19,771 square feet of office and retail uses.

[8] Calculating residual land value requires consideration of gross development value, and that gross development value is the total development cost inclusive of the developer's profit.

Under this alternative, CBRE determined that estimated gross annual rental income of the total leasable space would be $1,049,100, and the value of the property at completion is approximately $15,912,339. Subtracting total costs of $19,646,307 (which includes the cost to construct the new annex, and costs of renovation adjusted for the retained leasable square footage,[9] and costs of demolition) from the Gross Development Value of $15,912,339 returns a negative valuation of $3,733,908.

Thus, under Alternative 3 which offers the highest possible revenue for the preserved Barry Building by expanding leasable space, the residual land value is still negative. Even under Alternative 3 the total costs of the necessary renovations and retrofitting to prepare the Barry Building for lease are greater than the value of the renovated property.

It is important to note that for a project of this scale, a standard developer profit of 18% of the project value[10] is assumed to account for the developers' investment of time and money into the project, as well as the assumption of the risks associated with a development project. Here, developer profit here is estimated at $2,045,035 under Alternative 2 and $2,864,232 under Alternative 3 (which corresponds to approximately 18% of GDV). Even if developer profit was completely foregone from this analysis, the residual land value under *either* alternative would be negative. Thus, the land valuation would *still* be negative even if a developer took on the project for zero profit.

In conclusion, preserving and renovating the Barry Building is not economically feasible.

Sincerely,

Edward J. Casey

[9] Costs of renovating the entire building were reduced on a pro rata basis to account for only the portion of the building that would be retained and thus require renovation.

[10] According to CBRE, a standard acceptable developer profit, depending on the project, is generally between 16% and 20% of development costs. However, many developers may build a target gross margin of closer to 35% into their project pro forma.

ATTACHMENT F

Hill International

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Date: November 2, 2022

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Dear Mr. Berlin

Subject: Barry Building Renovations

This report estimates projected costs associated with implementing numerous upgrades to the Barry Building, including seismically retrofitting the building, and implementing building code and ADA upgrades. The projected cost for this work is $12,818,000.

This report is divided in to two sections:

Section 1 - Estimate Methodology and source documentation

Section 2 - Estimate of projected costs - Repair matrix

Section 1 - Estimate Methodology and source documentation

Estimate methodology

The estimate analysis was isolated into three major categories listed below by priority:

- Structural / Life safety - Building Code Compliance
- ADA Access
- Energy savings as required by code

For each item listed above every construction element identified in the following reports:

- *11973 San Vicente Boulevard, ASCE 41-13 Seismic Assessment* by Englekirk Structural Engineers Seismic Assessment
- *Project Impacts Assessment, 11973 San Vicente Boulevard* by Historic Resources Group
- *Barry Building ADA Update Requirements* by Gruen Associates
- A site visit by James Oswell on March 7, 2019.

The information identified and observed was surveyed and estimate element quantities were developed. These construction items were then priced and are included in the estimate prepared by Hill International on May 7, 2019 and updated to current construction costs as of November 2022.

This document has two attachments that identify the impact and effect of the repairs on the project as a whole and the cost associated with the repairs, see Section 2.

Example-1 - Electrical Installations

The ADA report by Gruen identified several if not all electrical outlets and switches were not at the proper height. The photos provided verified this to be the case. What was not identified was the fact that all of the outlets do not meet electric code requirements as the outlets do not have a ground and the restrooms do not have ground-fault circuit interrupter ("GFCI") protection. This means that the ADA requirement for height is superseded by a building code compliance requirement. When you consider when the building was built there is a strong possibility that the wire used has an asbestos insulation we arrive at a point where all electrical wire in the building must be removed and replaced.

Example-2 - Building Access

The ADA report goes into great detail regarding building access with respect to opening width, door swings, elevation of door handles, etc. The reality is that due to the date of original construction all doors and window frames are covered with lead paint which means the abatement would be required prior to relocating the hardware and patching the existing hardware locations. It is far cheaper to replace the doors than to remove the lead paint and patch the existing door pull openings. Once again, the ADA requirement is superseded by a building code / building safety requirement. The June 2021 Gruen report identifies the need for an additional second elevator that is included in the revised project costs.

Example-3 - Railing Modifications

As part of the building access recommendations were modifications to the handrails at the existing stairs and the second floor railings. These recommendations were made from a perspective of Historical preservation only and the means and methods were not considered. The recommendations made are not constructible as there is no way of welding additional steel elements to 60-year-old steel pipe. The only way to achieve what is required is to replace all railings with what is required by code.

Example-4 - Access and Drop-off requirements

In the ADA report, recommendations were made to provide a drop-off area on San Vicente Boulevard and to widen the sidewalk located on the East side of the building. The drop-off area on San Vicente Boulevard is most likely not possible as it would create a pinch point at the front of the building. The proposed drop-off area would improve ADA access to the building but at the same time impede foot traffic in front of the building. Approval by building department would be required. Widening the sidewalk to the East of the building would decrease the width of the driveway from approximately 21 feet to 18 feet which would create very narrow drive lanes accessing the parking area at the back of the building. Both of these recommendations may improve ADA access but would most likely not get through the plan check process.

Section 2 - Estimate of projected costs - Repair matrix

This document is accompanied by two attachments:

Attachment 1 - Estimate supporting documentation

Attachment 2 - Repair Matrix "Graphic showing the interrelationship between the various repair items " Please note that the ability to cross reference between the two reports is accomplished by using the Work Breakdown Structure (WBS) code number found at the beginning of each item in the estimate and the corresponding WBS number in the Repair Matrix. It should be noted that not all references are included in

the matrix. The repair matrix is provided as a general overview with references to the major categories in the estimate.

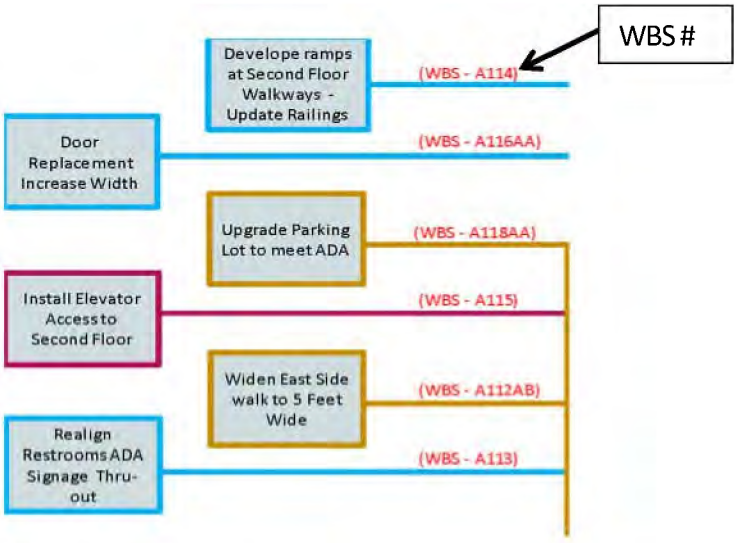
Estimate WBS

Code	Description	Total Labor	Total Materials	Total Equipment	Total
A1	BARRY BUILDING STRUCTURAL AND ADA UPGRADE	$3,865,544	$4,952,883	$1,334,228	$10,152,655
A111	STRUCTURAL	$2,030,704	$1,716,506	$662,256	$4,409,466
A111AA	ROOF	$168,996	$129,592	$65,923	$364,510
A111AA11	DEMO ROOF	$41,152	$11,619	$12,050	$64,821

WBS #

Matrix WBS

The repair work is separated into three code compliant categories



Analysis

- Structural / Life safety - Building Code Compliance
- ADA access
- Energy and Water conservation

These items were identified in consultant reports, identified on page 1, that will be supplied under a separate attachment. The assumption is that the work required is code minimum requirements that will require a separate waiver from all governing agencies for each item that will not be required. It is possible that some of the items estimated could get a waiver from one agency but it is unlikely that all agencies will agree to any specific item.

Example 1 - ADA Access Versus Access Drive width

One conflicting recommendation is identified in the ADA report is the widening of the East Sidewalk to 5 feet in width. The impact of this change would be the reduce the access drive width to 17 to 18 feet in width. This creates a conflict between the minimum roadway requirement and the ADA sidewalk width requirement. One of the controlling agencies will be required to wave the code requirement. The reasonable assumption is that if the project were to go forward minimum code compliance will be required in order to bring the building back to service.

The matrix provided in attachment provides an outline of the work required and the impact and effect of each item on the project as a whole. Understandably the work is complicated, and the main intent is to bring the building up to code with the minimum impact on the perceived historical nature of the building. In some cases, the historical nature of the project will be impacted as a result of code required work; this is due primarily to the structural modifications to the South building elevation, which includes installation of two-story steel moment resistant frames at the south wing where no continuous shear wall may be feasible. The steel moment resisting frames would consist of new wide flange steel columns, wide flange steel beams, and new concrete footings.

Examples:

The south elevation at the courtyard entry will require complete demolition as the pipe columns supporting the second floor do not meet seismic standards. In addition, an elevator shaft will need to be incorporated into the structure to accommodate the ADA requirements for accessibility to the second floor for those who cannot use the stairs. This work will require the demolition of the second-floor structure, removal for the stair railing and elevated walk way, realignment of the South Stairway and the ultimate reconstruction of all of these items and the ancillary work associated with this repair.

The second-floor walkway and railing does not meet code requirements. In order to address this issue ramps will need to be added to the second floor walkway at four locations where there are steps. This modification will impact the existing railing height, the location of second floor entry doors. In addition, the railing not impacted by the ramp requirement is not to code either in height or the spacing of vertical members. The net result is that ramps will need to be added at four locations and all second floor and stair railings will need to be replaced.

The Estimate and Matrix have been subdivided into three categories with the subcategories as follows:

- Structural / Life safety - Building Code Compliance
    - Abatement
    - Structural upgrades
    - Upgrades to steel stairs and railings
    - Fire Protection
    - Replacement of HVAC System
    - Electrical System Upgrade

~ ADA access code requirements

- Develop ramps at second floor walkways - Upgrade railings
- Door replacement - increase width to code minimum
- Upgrade parking lot to meet ADA requirements
- Install elevator for second floor access
- Widen East elevation sidewalk
- Realign restrooms on first and second floor to meet ADA

Energy - Water conservation requirements

- Replace all windows with dual glazed Low E glass
- Replace HVAC system with energy efficient system located in 2 HR rated enclosure
- Divert storm water to storm drain system
- Replace lighting with LED fixtures

Itemized list of work required

A1	BARRY BUILDING STRUCTURAL AND ADA UPGRADE
A111	STRUCTURAL
A111AA	ROOF
A111AB	2ND STORY FLOOR
A111AC	NEW 2-STORY STEEL MOMENT FRAME
A111AD	2-STORY SHEAR WALL
A111AE	STRENGTHEN EXISTING 2-STORY SHEAR WALL
A111AF	SHEAR WALL ON INT OF EXT WALL
A111AG	DEMO & RESTORE CEILINGS
A111AH	MEP- FP - OUTLETS - LIGHTS - GRILLS – DUCTWORK
A111AI	REPLACE PLATE DAMAGED BY MOISTURE & TERMITES IST FLOOR
A112	ACCESSIBLE PATH
A112AA	COMPLIANT PARKING LAYOUT W/ MARKING & SIGNS
A112AB	WIDEN SIDEWALKS TO 5’ AT THE EAST ELEVATION
A112AC	MODIFY EXTERIOR DOORWAYS AT THE EAST ELEVATION
A112AD	FLOOR MOUNTED HANDRAIL AT COURTYARD STEPS
A112AE	CONCRETE CURB OR A WELDED STEEL PLATE AT COURTYARD RAMP
A112AF	POST MOUNTED HORIZ RAIL OR A LANDSCAPE ELEMENT (36 SF)
A112AG	HANDRAILS FOR THE RAMP LEADING TO THE CMU ADDITION. (13 LF EACH SIDE)
A113	PLUMBING
A113AA	UPGRADE THE MEN’S ROOM FLOOR TO COMPLIANCE
A113AB	UPGRADE WOMEN’S ROOM ON 2ND FLOOR TO COMPLIANCE
A113AC	ADD UNISEX SINGLE RESTROOM AT 1ST FLOOR
A113AD	ADD UNISEX SINGLE RESTROOM AT 2ND FLOOR
A113AE	CODE COMPLIANT SIGNS FOR RESTROOMS
A113AF	WALL MOUNTED DRINKING FOUNTAIN AT 1ST FLOOR IN A NEW ALCOVE
A113AG	PLUMBING INFRASTRUCTURE
A114	STAIRS AND BALCONY RAILING
A114AA	ADD A SOLID OR PERFORATED STEEL PANEL AT EACH OPEN RISER
A114AB	ADD CONTRASTING STRIPE AT EACH RISER
A114AC	REPLACE EXISTING STEEL GUARDRAILS WITH NEW ONES
A114AD	REPLACE EXISTING 2ND FLOOR BALCONY GUARDRAILS
A114AE	WALL MOUNTED HANDRAIL AT EA OF 4 STAIRS BETWEEN 2ND FLOOR LEVELS
A115	VERTICAL TRANSPORTATION
A115AA	DEVELOP VERTICAL TRANSPORTATION
A115AB	ADD TWO EXTERIOR AREAS OF ASSISTED RESCUE ALONG THE 2ND FLOOR BALCONY
A116	TENANT SPACE
A116AA	WIDEN ALL TENANT DOORWAYS
A116AB	MODIFY LANDING TO NECESSARY DOORS
A116AC	PROVIDE HANDRAILS FOR TENANT INTERIOR STEPS

A116AD	REPLACE DOOR & FRAME FOR DOORS LESS THAN 34" W
A116AE	MODIFY & REINSTALL NECESSARY DOORS TO OPEN 90 DEGREES
A116AF	PROVIDE CODE COMPLIANT SIGNS FOR TENANT ENTRY DOOR
A116AG	LEVER DOOR HANDLES
A116AH	WINDOW REPLACEMENT
A116AI	REPLACE EXTERIOR WALL FINISHES
A117	ABATEMENT
A117AA	ABATEMENT
A118	SITE IMPROVEMENTS
A118AA	SITE IMPROVEMENTS
B1	OWNER'S COSTS
B111	OWNER'S COSTS
B111AA	OWNER'S COST

Projected Cost

The projected cost for the Barry Building repairs and upgrades required to bring the building up to current building codes is $12,818,000 as of November 2022.

Building area calculations

First Floor	7,142 BSF
Second Floor	7,142 BSF
Second Floor Balcony / walkway	1,150 BSF
Total Area	**15,434 BSF**

Midpoint of construction is assumed to be January 2024

Labor Rates used "Davis Bacon / Los Angeles County - September 1, 2022

Markups included in estimate for Subcontractors based on current markup conditions

Subcontractor Overhead - GC'S	6.5%
Bond	1.1%
Profit on Labor	12.0%
Profit on Material	10.0%
Profit on Equipment	7.5%
Liability Insurance	2.1%
Mobilization - Demobilization	3.5%

Markups included in estimate for General Contractor based on current markup conditions

General Conditions	10.0%
Prime Home Office Overhead	3.5%
Prime Profit	10.0%
Bond	0.8%
Miscellaneous Taxes	1.1%
CQC	1.0%
Builders Risk	0.4%
Insurance	2.1%
Escalation to June 2022	6.8%

Exclusions:

Legal fees associated with upgrade requirements

Finance costs

Tenant improvements to meet the needs of future tenants

- Partitioning within the open shell
- Floor coverings
- T-bar acoustic Ceilings
- IT upgrades
- Phone and communication systems
- Security systems
- Landscaping & courtyard upgrades
- San Vincente drop-off development
- Site lighting
- Signage improvements
- Special permitting

Unforeseen conditions or items not specifically addressed in estimate

Schedule assumptions

Due to the nature of this project the projected bid date for this project is assumed to be June

2023 with projected duration of 12 months.

Senior Consultant Hill International Inc. - Professor ASU "Advanced Building Estimating"

James N. Oswell, Jr., CCP, has more than 45 years of professional experience in construction cost. He is an industry expert in cost estimating, budget analysis and cost forecasting. Jim's unique approach to integrating cost and schedule data enhances the project management, value engineering and enriches project efficiencies. His expertise covers claims avoidance, constructability reviews, claims review and resolution and change order request analysis and reconciliation for a wide range of projects including education, general building, government, hospitals and heavy civil construction projects. In addition to cost services, he specializes in escalation forecasting services for large construction programs, including services to notable clients such as U.S. Army Corps of Engineers, Naval Facilities Engineering Command (NAVFAC), and Office of the Capitol Architect, Washington, DC, Port of Long Beach, and Seattle school district and State of California department of corrections.

For additional Questions please call:

Louis Rivera

480-798-9629 - Cell

Attachments – Estimate Reports

B-SYS BARRY BLDG 10_18_22_V7 - Estimate Summary
C-SYS BARRY BLDG 10_18_22_V7 - Construction System Summary
E-SYS BARRY BLDG 10_18_22_V7 - Estimate Detail

Hill International

Hill International (Arizona) Inc.
2201 East Camelback Road
Suite 350
Phoenix, AZ 85016
Tel: 602-778-9888
www.hillintl.com
AZ Contractor's License Number
ROC 289497

March 13, 2023

Gina M. Angiolillo
Senior Associate
Alston & Bird
333 South Hope Street
Los Angeles, CA 90071

Subject: Barry Building Area

Dear Ms. Angiolillo,

Gina, your assumption is correct.
The total building area impacted by construction is 15434 SF.
The leasable space at 12,800 sf does not include square footage for common-use restrooms and mechanical rooms (13956 – 12800) = 1156 sf "Restrooms and Mechanical /electrical spaces."
The balance (15434 – 13956) =1478 sf, includes Perimeter elevated walkway, main breeze way, and back breeze way going from courtyard to parking area.

Louis Rivera

Louis Rivera
Director of Estimating
Hill International

B--System Report REV 2
SUBMITTAL: CONCEPT
SOFTWARE VERSION: SUCCESS 5.X
REPORT REVISION: Nov. 5 2003
ESTIMATE SAVED AS: BARRY BLDG ADA UPGRADE_10_18_22_V7.PWS

Hill International

CONSTRUCTION CONTRACT:
DATABASE USED: RSM MODIFIED
PRINTING DATE: 2 November 2022
Page 1 OF 1

PROJECT:
PROJECT SITE: LOS ANGELES
A/E NAME: OWNER
PROJECT SIZE: 15,434.00 SF
CONSTRUCTION FUNDS AVAILABLE, DOLLARS: $13,000,000

ESTIMATOR: HILL
CAT CODE:
UIC:
PROJECT #:
DATE OF ESTIMATE: OCT 18, 2022
BID DATE: JAN 2023

WBS CODE	DESCRIPTION	COST/PROJECT UOM BASED ON 15,434 SF	COST/ WBS UNIT	TOTAL MARKED UP COSTS MATL	LABOR	EQUIP	UNIT COST	TOTAL
			BARRY BUILDING, PROJECT TOTALS					**12,818,000**
	****PROJECT SUBTOTALS****			4,952,883	3,865,544	1,334,228	2,665,320	12,817,975
BASE BID		***657.81/SF***	***15434@ 657.81BSF***	***4,952,883***	***3,865,544***	***1,334,228***	***0***	***10,152,655***
-BARRY BUILDING STRUCTURAL AND ADA UPGRADE		657.81/SF	15434@ 657.81BSF	**4,952,883**	**3,865,544**	**1,334,228**	**0**	**10,152,655**
A111	STRUCTURAL	285.70/SF	15434@ 285.70BSF	1,716,506	2,030,704	662,256	0	4,409,466
A112	ACCESSIBLE PATH	32.70/SF	15434@ 32.70BSF	301,551	118,822	84,293	0	504,665
A113	PLUMBING	15.58/SF	15434@ 15.58BSF	143,518	58,306	38,698	0	240,522
A114	STAIRS AND BALCONY RAILING	7.81/SF	15434@ 7.81BSF	78,016	37,459	5,030	0	120,505
A115	VERTICAL TRANSPORTATION	56.22/SF	15434@ 56.22BSF	655,097	177,337	35,284	0	867,717
A116	TENANT SPACE	125.48/SF	15434@ 125.48BSF	1,141,923	624,222	170,565	0	1,936,710
A117	ABATEMENT	100.27/SF	15434@ 100.27BSF	616,777	674,952	255,887	0	1,547,616
A118	SITE IMPROVEMENTS	34.05/SF	38811@ 13.54SF	299,495	143,742	82,216	0	525,453
OWNER'S COSTS		***172.69/SF***	***10152655@ 0.26TC$***	***0***	***0***	***0***	***2,665,320***	***2,665,320***
-OWNER'S COSTS		172.69/SF	10152655@ 0.26TC$	**0**	**0**	**0**	**2,665,320**	**2,665,320**
B111	OWNER'S COSTS	172.69/SF	10152655@ 0.26TC$	0	0	0	2,665,320	2,665,320

C--Assembly Category Report
SUBMITTAL: CONCEPT
SOFTWARE VERSION: SUCCESS 5.X
REPORT REVISION: Nov. 5 2003
ESTIMATE SAVED AS: BARRY BLDG ADA UPGRADE_10_18_22_V7.PWS

Hill International

CONSTRUCTION CONTRACT:
DATABASE USED: RSM MODIFIED
PRINTING DATE: 11/02/2022
Page: 1 OF 3

PROJECT:
PROJECT SITE: LOS ANGELES
A/E NAME: OWNER
PROJECT SIZE: 15,434.00SF
CONSTRUCTION FUNDS AVAILABLE, DOLLARS: $13,000,000

ESTIMATOR: HILL
CAT CODE:
UIC:
PROJECT #:
DATE OF ESTIMATE: OCT 18, 2022

WBS CODE	DESCRIPTION	COST/WBS BASED ON 15,434 SF	COST/ WBS UNIT	TOTAL MARKED UP COSTS MATL	LABOR	EQUIP	UNIT COST	TOTAL
			BARRY BUILDING, PROJECT TOTALS					**12,818,000**
	*****PROJECT SUBTOTALS****			4,952,883	3,865,544	1,334,228	2,665,320	12,817,975
BASE BID		**657.81/SF**	**15434@ 657.81BSF**	**4,952,883**	**3,865,544**	**1,334,228**	**0**	**10,152,655**
-BARRY BUILDING STRUCTURAL AND ADA UPGRADE		**657.81/SF**	**15434@ 657.81BSF**	**4,952,883**	**3,865,544**	**1,334,228**	**0**	**10,152,655**
A1 STRUCTURAL		**285.70/SF**	**15434@ 285.70BSF**	**1,716,506**	**2,030,704**	**662,256**	**0**	**4,409,466**
A111 ROOF		23.62/SF	7142@ 51.04SF	129,592	168,996	65,923	0	364,510
A111AA	DEMO ROOF	4.20/SF	7142@ 9.08SF	11,619	41,152	12,050	0	64,821
A111AA	NEW 3/4" PLYWOOD ROOF SHEATHING	7.38/SF	7142@ 15.94SF	33,068	59,544	21,265	0	113,877
A111AA	NEW ROOF	12.04/SF	7142@ 26.02SF	84,905	68,300	32,607	0	185,812
A111 2ND STORY FLOOR		13.38/SF	7142@ 28.91SF	44,687	128,449	33,316	0	206,452
A111AB	DEMO FLOOR DECKING FLOOR COVERINGS	6.00/SF	7142@ 12.96SF	11,619	68,906	12,050	0	92,574
A111AB	NEW 3/4" PLYWOOD FLOOR SHEATHING	7.38/SF	7142@ 15.94SF	33,068	59,544	21,265	0	113,877
A111 NEW 2-STORY STEEL MOMENT FRAME		20.86/SF	7142@ 45.07SF	121,310	102,670	97,932	0	321,911
A111AC	FOUNDATIONS	0.53/SF	6@ 1370.15EA	4,955	2,253	1,012	0	8,221
A111AC	DEMO OF SOG AT ENTRY	2.31/SF	1200@ 29.68SF	5,556	9,817	20,247	0	35,620
A111AC	SOG REPLACEMENT	2.20/SF	1200@ 28.34SF	15,918	13,679	4,407	0	34,004
A111AC	DEMO STRUCTURE	4.91/SF	1200@ 63.14SF	19,522	21,708	34,539	0	75,769
A111AC	W12x96 (8 EA TOTAL)	3.83/SF	119@ 496.25LF	24,303	20,011	14,740	0	59,053
A111AC	W14x132	4.82/SF	150@ 496.25LF	30,634	25,224	18,580	0	74,437
A111AC	RESTORE STRUCTURE @ ENTRY	2.26/SF	1200@ 29.01SF	20,423	9,978	4,407	0	34,807
A111 2-STORY SHEAR WALL		37.29/SF	245@ 2349.35LF	286,598	198,002	90,992	0	575,592
A111AD	SLAB DEMO	2.83/SF	1470@ 29.68SF	6,806	12,026	24,803	0	43,635
A111AD	SHEAR WALL FOUNDATIONS	5.44/SF	245@ 342.54LF	50,587	23,000	10,334	0	83,922
A111AD	SOG REPLACEMENT	2.70/SF	1470@ 28.34SF	19,499	16,757	5,398	0	41,655
A111AD	NEW 2-STORY SHEAR WALL	10.95/SF	245@ 689.75LF	88,910	52,116	27,964	0	168,990
A111AD	DRYWALL - FINISHES	10.00/SF	12250@ 12.60SF	84,312	57,848	12,158	0	154,318
A111AD	WALL DEMO	5.38/SF	6125@ 13.56SF	36,484	36,254	10,334	0	83,073
A111 STRENGTHEN EXISTING 2-STORY SHEAR WALL		17.87/SF	198@ 1392.61LF	126,736	117,558	31,443	0	275,736
A111AE	STRENGTHEN EXISTING 2-STORY SHEAR WALL	5.44/SF	4950@ 16.95SF	29,113	41,508	13,265	0	83,886
A111AE	WALL DEMO	4.35/SF	4950@ 13.56SF	29,485	29,299	8,352	0	67,136
A111AE	DRYWALL - FINISHES	8.08/SF	9900@ 12.60SF	68,138	46,751	9,826	0	124,714
A111 SHEAR WALL ON INT OF EXT WALL		19.95/SF	7142@ 43.11SF	133,703	135,889	38,278	0	307,869
A111AF	NEW 2-STORY SHEAR WALL	7.84/SF	7142@ 16.95SF	42,006	59,888	19,139	0	121,033
A111AF	WALL DEMO	6.28/SF	7142@ 13.56SF	42,542	42,274	12,050	0	96,866
A111AF	DRYWALL - FINISHES	5.83/SF	7142@ 12.60SF	49,155	33,727	7,088	0	89,970
A111 DEMO & RESTORE CEILINGS		25.54/SF	15434@ 25.54BSF	198,159	154,723	41,359	0	394,242
A111AG	CEILING DEMO	12.33/SF	15434@ 12.33bSF	91,934	72,323	26,041	0	190,298
A111AG	DRYWALL - FINISHES	13.21/SF	15434@ 13.21BSF	106,226	82,400	15,318	0	203,944
A111 MEP- FP - OUTLETS - LIGHTS - GRILLS - DUCTWORK		108.19/SF	15434@ 108.19BSF	552,480	936,428	180,855	0	1,669,762
A111AH	ELECTRICAL	23.06/SF	15434@ 23.06BSF	243,354	86,534	26,041	0	355,928
A111AH	MECHANICAL	63.16/SF	15434@ 63.16BSF	93,592	752,516	128,726	0	974,835
A111AH	FIRE PROTECTION	21.96/SF	15434@ 21.96BSF	215,534	97,378	26,087	0	338,999
A111 REPLACE PLATE DAMAGED BY MOISTURE & TERMITES IST FLOOR		19.01/SF	250@ 1173.57LF	123,242	87,991	82,160	0	293,393
A111AI	DEMO REQUIRED TO REPLACE PLATE	6.74/SF	250@ 415.92LF	16,406	34,907	52,667	0	103,980
A111AI	REPLACE PLATE - STUDS - PLASTER	9.20/SF	250@ 568.16LF	69,295	47,720	25,026	0	142,041
A111AI	REINFORCE STUD - TOP PLATE CONNECTION	3.07/SF	5000@ 9.47LF	37,541	5,365	4,466	0	47,372
A1 ACCESSIBLE PATH		**32.70/SF**	**15434@ 32.70BSF**	**301,551**	**118,822**	**84,293**	**0**	**504,665**
A112 COMPLIANT PARKING LAYOUT W/ MARKING & SIGNS		25.87/SF	34881@ 11.45SF	249,212	89,550	60,509	0	399,271
A112AA	AC OVERLAY - CO-PLANE	25.27/SF	34881@ 11.18SF	244,436	86,724	58,853	0	390,013
A112AA	RESTRIPE - SIGNAGE	0.60/SF	90@ 102.86STALLS	4,775	2,827	1,655	0	9,258
A112 WIDEN SIDEWALKS TO 5Æ AT THE EAST ELEVATION		3.90/SF	135@ 445.66LF	18,617	19,735	21,813	0	60,165
A112AB	WIDEN SIDEWALKS TO 5Æ AT THE EAST ELEVATION	3.90/SF	135@ 445.66LF	18,617	19,735	21,813	0	60,165
A112 MODIFY EXTERIOR DOORWAYS AT THE EAST ELEVATION		2.17/SF	3@ 11167.28EA	26,279	5,734	1,489	0	33,502
A112AC	MODIFY EXTERIOR DOORWAYS AT THE EAST ELEVATION	2.17/SF	3@ 11167.28EA	26,279	5,734	1,489	0	33,502
A112 FLOOR MOUNTED HANDRAIL AT COURTYARD STEPS		0.19/SF	12@ 247.52LF	1,952	911	107	0	2,970
A112AD	FLOOR MOUNTED HANDRAIL AT COURTYARD STEPS	0.19/SF	12@ 247.52LF	1,952	911	107	0	2,970
A112 CONCRETE CURB OR A WELDED STEEL PLATE AT COURTYARD RAMP (APPROX 3 LF)		0.05/SF	3@ 279.11LF	285	463	89	0	837
A112AE	CONCRETE CURB OR A WELDED STEEL PLATE AT COURTYARD RAMP (APPROX 3 LF)	0.05/SF	3@ 279.11LF	285	463	89	0	837
A112 POST MOUNTED HORIZ RAIL OR A LANDSCAPE ELEMENT (36 SF)		0.10/SF	6@ 247.52LF	976	455	54	0	1,485
A112AF	POST MOUNTED HORIZ RAIL OR A LANDSCAPE ELEMENT (36 SF)	0.10/SF	6@ 247.52LF	976	455	54	0	1,485

C--Assembly Category Report
SUBMITTAL: CONCEPT
SOFTWARE VERSION: SUCCESS 5.X
REPORT REVISION: Nov. 5 2003
ESTIMATE SAVED AS: BARRY BLDG ADA UPGRADE_10_18_22_V7.PWS

Hill International

CONSTRUCTION CONTRACT:
DATABASE USED: RSM MODIFIED
PRINTING DATE: 11/02/2022
Page: 2 OF 3

PROJECT:
PROJECT SITE: LOS ANGELES
A/E NAME: OWNER
PROJECT SIZE: 15,434.00SF
CONSTRUCTION FUNDS AVAILABLE, DOLLARS: $13,000,000

ESTIMATOR: HILL
CAT CODE:
UIC:
PROJECT #:
DATE OF ESTIMATE: OCT 18, 2022

WBS CODE	DESCRIPTION	COST/WBS BASED ON 15,434 SF	COST/ WBS UNIT	TOTAL MARKED UP COSTS MATL	LABOR	EQUIP	UNIT COST	TOTAL
A112	HANDRAILS FOR THE RAMP LEADING TO THE CMU ADDITION. (13 LF EACH SIDE)	0.42/SF	26@ 247.52LF	4,230	1,974	232	0	6,435
A112AG	HANDRAILS FOR THE RAMP LEADING TO THE CMU ADDITION. (13 LF EACH SIDE)	0.42/SF	26@ 247.52LF	4,230	1,974	232	0	6,435
A1	**PLUMBING**	**15.58/SF**	**15434@ 15.58BSF**	**143,518**	**58,306**	**38,698**	**0**	**240,522**
A113	UPGRADE THE MENÆS ROOM ON 1ST FLOOR TO COMPLIANCE	1.36/SF	136@ 246.91SF	21,103	8,293	4,184	0	33,580
A113AA	UPGRADE THE MENÆS ROOM ON 1ST FLOOR TO COMPLIANCE	2.18/SF	136@ 246.91SF	21,103	8,293	4,184	0	33,580
A113	UPGRADE WOMENÆS ROOM ON 2ND FLOOR TO COMPLIANCE	1.84/SF	115@ 246.91SF	17,845	7,012	3,538	0	28,395
A113AB	UPGRADE WOMENÆS ROOM ON 2ND FLOOR TO COMPLIANCE	1.84/SF	115@ 246.91SF	17,845	7,012	3,538	0	28,395
A113	ADD UNISEX SINGLE RESTROOM AT 1ST FLOOR	3.46/SF	180@ 296.97SF	36,941	10,975	5,538	0	53,454
A113AC	ADD UNISEX SINGLE RESTROOM AT 1ST FLOOR	3.46/SF	180@ 296.97SF	36,941	10,975	5,538	0	53,454
A113	ADD UNISEX SINGLE RESTROOM AT 2ND FLOOR	0.02/SF		205	61	31	0	297
A113AD	ADD UNISEX SINGLE RESTROOM AT 2ND FLOOR	0.02/SF		205	61	31	0	297
A113	CODE COMPLIANT SIGNS FOR RESTROOMS	0.05/SF	4@ 193.03EA	601	144	28	0	772
A113AE	CODE COMPLIANT SIGNS FOR RESTROOMS	0.05/SF	4@ 193.03EA	601	144	28	0	772
A113	WALL MOUNTED DRINKING FOUNTAIN AT 1ST FLOOR IN A NEW ALCOVE	0.43/SF		5,506	699	367	0	6,572
A113AF	WALL MOUNTED DRINKING FOUNTAIN AT 1ST FLOOR IN A NEW ALCOVE	0.43/SF		5,506	699	367	0	6,572
A113	PLUMBING INFRASTRUCTURE	7.61/SF	15434@ 7.61BSF	61,318	31,123	25,011	0	117,451
A113AG	PLUMBING INFRASTRUCTURE	7.61/SF	15434@ 7.61BSF	61,318	31,123	25,011	0	117,451
A1	**STAIRS AND BALCONY RAILING**	**7.81/SF**	**15434@ 7.81BSF**	**78,016**	**37,459**	**5,030**	**0**	**120,505**
A114	ADD A SOLID OR PERFORATED STEEL PANEL AT EACH OPEN RISER	0.37/SF	40@ 141.37RISERS	3,504	1,635	516	0	5,655
A114AA	ADD A SOLID OR PERFORATED STEEL PANEL AT EACH OPEN RISER	0.37/SF	40@ 141.37RISERS	3,504	1,635	516	0	5,655
A114	ADD CONTRASTING STRIPE AT EACH RISER	0.09/SF	40@ 36.54EA	481	862	119	0	1,462
A114AB	ADD CONTRASTING STRIPE AT EACH RISER	0.09/SF	40@ 36.54EA	481	862	119	0	1,462
A114	REPLACE EXISTING STEEL GUARDRAILS WITH NEW ONES	2.81/SF	175@ 247.52LF	28,469	13,283	1,563	0	43,315
A114AC	REPLACE EXISTING STEEL GUARDRAILS WITH NEW ONES	2.81/SF	175@ 247.52LF	28,469	13,283	1,563	0	43,315
A114	REPLACE EXISTING 2ND FLOOR BALCONY GUARDRAILS	3.16/SF	197@ 247.52LF	32,048	14,953	1,760	0	48,761
A114AD	REPLACE EXISTING 2ND FLOOR BALCONY GUARDRAILS	3.16/SF	197@ 247.52LF	32,048	14,953	1,760	0	48,761
A114	WALL MOUNTED HANDRAIL AT EA OF 4 STAIRS BETWEEN 2ND FLOOR LEVELS	1.38/SF	120@ 177.61LF	13,515	6,726	1,072	0	21,313
A114AE	WALL MOUNTED HANDRAIL AT EA OF 4 STAIRS BETWEEN 2ND FLOOR LEVELS	1.38/SF	120@ 177.61LF	13,515	6,726	1,072	0	21,313
A1	**VERTICAL TRANSPORTATION**	**56.22/SF**	**15434@ 56.22BSF**	**655,097**	**177,337**	**35,284**	**0**	**867,717**
A115	DEVELOP VERTICAL TRANSPORTATION	54.57/SF		638,203	171,206	32,753	0	842,162
A115AA	ADD 2 EA -2-DOOR ELEVATORS W/ 2 STOPS	54.57/SF	2@ 421081.00EA	638,203	171,206	32,753	0	842,162
A115	ADD TWO EXTERIOR AREAS OF ASSISTED RESCUE ALONG THE 2ND FLOOR BALCONY	1.66/SF	2@ 12777.62EA	16,894	6,131	2,531	0	25,555
A115AB	ADD TWO EXTERIOR AREAS OF ASSISTED RESCUE ALONG THE 2ND FLOOR BALCONY	1.66/SF	150@ 170.37SF	16,894	6,131	2,531	0	25,555
A1	**TENANT SPACE**	**125.48/SF**	**15434@ 125.48BSF**	**1,141,923**	**624,222**	**170,565**	**0**	**1,936,710**
A116	WIDEN ALL TENANT DOORWAYS	11.19/SF	40@ 4319.46EA	120,132	41,927	10,719	0	172,778
A116AA	WIDEN ALL TENANT DOORWAYS	11.19/SF	40@ 4319.46EA	120,132	41,927	10,719	0	172,778
A116	MODIFY LANDING TO NECESSARY DOORS	1.69/SF	15434@ 1.69BSF	16,268	7,182	2,581	0	26,031
A116AB	MODIFY LANDING TO NECESSARY DOORS	1.69/SF		16,268	7,182	2,581	0	26,031
A116	PROVIDE HANDRAILS FOR TENANT INTERIOR STEPS	2.07/SF	15@ 2131.31EA	20,272	10,089	1,608	0	31,970
A116AC	PROVIDE HANDRAILS FOR TENANT INTERIOR STEPS	2.07/SF	15@ 2131.31EA	20,272	10,089	1,608	0	31,970
A116	REPLACE DOOR & FRAME FOR DOORS LESS THAN 34" W	8.40/SF	30@ 4319.46EA	90,099	31,445	8,039	0	129,584
A116AD	REPLACE DOOR & FRAME FOR DOORS LESS THAN 34" W	8.40/SF	30@ 4319.46EA	90,099	31,445	8,039	0	129,584
A116	MODIFY & REINSTALL NECESSARY DOORS TO OPEN 90 DEGREES	2.73/SF	25@ 1686.78EA	23,776	16,160	2,233	0	42,169
A116AE	MODIFY & REINSTALL NECESSARY DOORS TO OPEN 90 DEGREES	2.73/SF	25@ 1686.78EA	23,776	16,160	2,233	0	42,169
A116	PROVIDE CODE COMPLIANT SIGNS FOR TENANT ENTRY DOOR	0.50/SF	40@ 193.02EA	6,007	1,436	278	0	7,721
A116AF	PROVIDE CODE COMPLIANT SIGNS FOR TENANT ENTRY DOOR	0.50/SF	40@ 193.02EA	6,007	1,436	278	0	7,721
A116	LEVER DOOR HANDLES	1.78/SF	75@ 366.37EA	25,340	1,616	521	0	27,478
A116AG	LEVER DOOR HANDLES	1.78/SF	75@ 366.37EA	25,340	1,616	521	0	27,478
A116	WINDOW REPLACEMENT	25.71/SF	2200@ 180.34SF	273,051	85,283	38,410	0	396,744
A116AH	WINDOW REPLACEMENT + 10 OPENABLE WINDOWS	25.71/SF	2200@ 180.34SF	273,051	85,283	38,410	0	396,744
A116	REPLACE EXTERIOR WALL FINISHES	71.42/SF	62928@ 17.52SF	566,977	429,083	106,176	0	1,102,235
A116AI	REPLACE EXTERIOR WALL FINISHES	71.42/SF	62928@ 17.52SF	566,977	429,083	106,176	0	1,102,235

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Hill International

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Page: 3 OF 3

PROJECT:
PROJECT SITE: LOS ANGELES
A/E NAME: OWNER
PROJECT SIZE: 15,434.00SF
CONSTRUCTION FUNDS AVAILABLE, DOLLARS: $13,000,000

ESTIMATOR: HILL
CAT CODE:
UIC:
PROJECT #:
DATE OF ESTIMATE: OCT 18, 2022

WBS CODE	DESCRIPTION	COST/WBS BASED ON 15,434 SF	COST/ WBS UNIT	TOTAL MARKED UP COSTS MATL	LABOR	EQUIP	UNIT COST	TOTAL
A1 ABATEMENT		**100.27/SF**	**15434@ 100.27BSF**	**616,777**	**674,952**	**255,887**	**0**	**1,547,616**
A117 ABATEMENT		100.27/SF	15434@ 100.27BSF	616,777	674,952	255,887	0	1,547,616
A117AAABATEMENT - ASBESTOUS		17.63/SF	15434@ 17.63BSF	135,196	110,856	26,041	0	272,093
A117AAABATEMENT - LEAD PAINT		13.24/SF	15434@ 13.24BSF	110,089	68,219	26,041	0	204,349
A117AAABATEMENT - ELECTRICAL WIRE		10.11/SF	15434@ 10.11BSF	83,049	46,900	26,041	0	155,991
A117AAABATEMENT - BLACK MOLD		36.27/SF	15434@ 36.27BSF	0	391,140	168,632	0	559,772
A117AADUMP FEES		3.28/SF	30@ 1689.36LDS	50,681	0	0	0	50,681
A117AAREMOVE PCB CONTAINING EQUIPMENT		19.74/SF	5@ 60946.08EA	237,762	57,837	9,131	0	304,730
A1 SITE IMPROVEMENTS		**34.05/SF**	**38811@ 13.54SF**	**299,495**	**143,742**	**82,216**	**0**	**525,453**
A118 SITE IMPROVEMENTS		34.05/SF	34881@ 15.06SF	299,495	143,742	82,216	0	525,453
A118AADIVERT RAIN WATER TO STORM DRAIN		10.62/SF	350@ 468.25LF	82,466	52,143	29,279	0	163,887
A118AAUPGRADE PARKING LOT DRAINAGE		9.68/SF	3@ 49799.84EA	101,362	33,150	14,888	0	149,400
A118AAWIDEN EAST SIDE WALKWAYY TO 5 FEET		4.39/SF	1500@ 45.16SF	39,043	20,595	8,099	0	67,736
A118AAUPGRADE PARKING LOT TO MEET ADA		0.15/SF	4@ 589.51EA	1,251	829	278	0	2,358
A118AAREPAIR & RESURFACE EAST ROADWAY		3.72/SF	2430@ 23.64SF	37,707	12,755	6,994	0	57,455
A118AASEWER LINE REPLACEMENT		5.48/SF	250@ 338.46LF	37,667	24,271	22,679	0	84,616
OWNER'S COSTS		**172.69/SF**	**10152655@ 0.26TC$**	**0**	**0**	**0**	**2,665,320**	**2,665,320**
-OWNER'S COSTS		**172.69/SF**	**10152655@ 0.26TC$**	**0**	**0**	**0**	**2,665,320**	**2,665,320**
B1 OWNER'S COSTS		**172.69/SF**	**10152655@ 0.26TC$**	**0**	**0**	**0**	**2,665,320**	**2,665,320**
B111 OWNER'S COST		172.69/SF	10152655@ 0.26TC$	0	0	0	2,665,320	2,665,320
B111AADESIGN		64.98/SF	10152655@ 0.10TC$	0	0	0	1,002,922	1,002,922
B111AAPERMITS		13.92/SF	10152655@ 0.02TC$	0	0	0	214,912	214,912
B111AACONSTRUCTION MANAGEMENT		27.85/SF	10152655@ 0.04TC$	0	0	0	429,824	429,824
B111AACONTINGENCY @ 15%		65.94/SF	6784419@ 0.15TC$	0	0	0	1,017,663	1,017,663

E-SYS Estimate Detail Report
CONCEPT
SOFTWARE VERSION: SUCCESS 5.X
REPORT REVISION DATE JULY 2002
ESTIMATE SAVED AS: BARRY BLDG ADA UPGRADE_10_18_22_V7.PWS

CONSTRUCTION CONTRACT:
DATABASE USED: RSM MODIFIED
PRINTING DATE: 11/02/2022
Page No. 1

PROJECT:
PROJECT SITE: LOS ANGELES
A/E NAME: OWNER
PROJECT SIZE: 15,434.00 SF
CONSTRUCTION FUNDS AVAILABLE: 13,000,000 USD
CURRENCY: DOLLARS

ESTIMATOR: HILL
CAT CODE:
UIC:
PROJECT #:
DATE OF ESTIMATE: OCT 18, 2022
BID DATE: JAN 2023

CODE SUB/CREW	DESCRIPTION	QTY UM	TOTAL COSTS MATERIAL	LABOR	EQUIPMENT	UNIT COST (SUB QUOTE)	TOTAL
BARRY BUILDING BASE BIDA1 BARRY BUILDING STRUCTURAL AND ADA UPGRADE							
A1 STRUCTURAL							
REF COMPLETE							
A111 STRUCTURAL							
A111AA ROOF							
A111AA11 DEMO ROOF	*LEVEL CONTRACTOR ID APPLIED--PRIME*						
* LEVEL IS AN ASSEMBLY WITH UOM OF 1							
	Demo Roof		0.92	3.20	0.98	0.00	5.10
SUB-111/111	0.043 hrs/unit 307 TOTAL HRS	7,142.00 SF	6,578	22,883	6,981	0	36,443
* LINE ITEM ASSEMBLY	Factor:1.0000						
	Subtotal Direct Costs		6,578	22,883	6,981	0	36,443
	Subcontractor Markups		1,655	6,278	1,558	0	9,490
	Prime Contractor Markups		3,385	11,991	3,511	0	18,888
TOTAL A111AA11 DEMO ROOF		307 HRS	11,619	41,152	12,050	0	64,821
7,142.00 SF	*Level Unit Cost-->*		*1.63*	*5.76*	*1.69*	*0.00*	*9.08*
A111AA12 NEW 3/4" PLYWOOD ROOF SHEATHING	*LEVEL CONTRACTOR ID APPLIED--PRIME*						
* LEVEL IS AN ASSEMBLY WITH UOM OF 1							
	New Plywood Decking		2.62	4.64	1.73	0.00	8.98
SUB-711/711	0.068 hrs/unit 486 TOTAL HRS	7,142.00 SF	18,722	33,110	12,320	0	64,152
* LINE ITEM ASSEMBLY	Factor:1.0000						
	Subtotal Direct Costs		18,722	33,110	12,320	0	64,152
	Subcontractor Markups		4,710	9,083	2,749	0	16,543
	Prime Contractor Markups		9,636	17,350	6,196	0	33,182
TOTAL A111AA12 NEW 3/4" PLYWOOD ROOF SHEATHING		486 HRS	33,068	59,544	21,265	0	113,877
7,142.00 SF	*Level Unit Cost-->*		*4.63*	*8.34*	*2.98*	*0.00*	*15.94*
A111AA13 NEW ROOF	*LEVEL CONTRACTOR ID APPLIED--PRIME*						
* LEVEL IS AN ASSEMBLY WITH UOM OF 1							
	New Roof		6.73	5.32	2.65	0.00	14.69
SUB-711/711	0.078 hrs/unit 557 TOTAL HRS	7,142.00 SF	48,071	37,979	18,891	0	104,941
* LINE ITEM ASSEMBLY	Factor:1.0000						
	Subtotal Direct Costs		48,071	37,979	18,891	0	104,941
	Subcontractor Markups		12,094	10,419	4,215	0	26,728
	Prime Contractor Markups		24,740	19,902	9,501	0	54,143
TOTAL A111AA13 NEW ROOF		557 HRS	84,905	68,300	32,607	0	185,812
7,142.00 SF	*Level Unit Cost-->*		*11.89*	*9.56*	*4.57*	*0.00*	*26.02*
SUBTOTAL A111AA ROOF			73,372	93,973	38,192	0	205,536
MARKUP			*1.766*	*1.798*	*1.726*	*0.000*	*1.773*
TOTAL A111AA ROOF			129,592	168,996	65,923	0	364,510
A111AB 2ND STORY FLOOR							
A111AB11 DEMO FLOOR DECKING FLOOR COVERINGS	*LEVEL CONTRACTOR ID APPLIED--PRIME*						
* LEVEL IS AN ASSEMBLY WITH UOM OF 1							
	2Nd Floor Decking		0.92	5.37	0.98	0.00	7.26
SUB-111/111	0.072 hrs/unit 514 TOTAL HRS	7,142.00 SF	6,578	38,316	6,981	0	51,875
* LINE ITEM ASSEMBLY	Factor:1.0000						
	Subtotal Direct Costs		6,578	38,316	6,981	0	51,875
	Subcontractor Markups		1,655	10,512	1,558	0	13,724
	Prime Contractor Markups		3,385	20,078	3,511	0	26,975
TOTAL A111AB11 DEMO FLOOR DECKING FLOOR COVERINGS		514 HRS	11,619	68,906	12,050	0	92,574
7,142.00 SF	*Level Unit Cost-->*		*1.63*	*9.65*	*1.69*	*0.00*	*12.96*

CODE SUB/CREW	DESCRIPTION	QTY UM	TOTAL COSTS MATERIAL	LABOR	EQUIPMENT	UNIT COST (SUB QUOTE)	TOTAL
A111AB 2ND STORY FLOOR							
A111AB12 NEW 3/4" PLYWOOD FLOOR SHEATHING	*LEVEL CONTRACTOR ID APPLIED--PRIME*						
* LEVEL IS AN ASSEMBLY WITH UOM OF 1							
	New Plywood Decking		2.62	4.64	1.73	0.00	8.98
SUB-711/711	0.068 hrs/unit 486 TOTAL HRS	7,142.00 SF	18,722	33,110	12,320	0	64,152
* LINE ITEM ASSEMBLY	Factor:1.0000						
	Subtotal Direct Costs		18,722	33,110	12,320	0	64,152
	Subcontractor Markups		4,710	9,083	2,749	0	16,543
	Prime Contractor Markups		9,636	17,350	6,196	0	33,182
TOTAL A111AB12 NEW 3/4" PLYWOOD FLOOR SHEATHING		486 HRS	33,068	59,544	21,265	0	113,877
7,142.00 SF	*Level Unit Cost-->*		*4.63*	*8.34*	*2.98*	*0.00*	*15.94*
SUBTOTAL A111AB 2ND STORY FLOOR			25,301	71,426	19,301	0	116,028
MARKUP			*1.766*	*1.798*	*1.726*	*0.000*	*1.779*
TOTAL A111AB 2ND STORY FLOOR			44,687	128,449	33,316	0	206,452
A111AC NEW 2-STORY STEEL MOMENT FRAME							
A111AC11 FOUNDATIONS	*LEVEL CONTRACTOR ID APPLIED--PRIME*						
	Concrete		467.61	208.81	97.75	0.00	774.17
SUB-311/311	2.8 hrs/unit 17 TOTAL HRS	6.00 CY	2,806	1,253	587	0	4,645
* LINE ITEM ASSEMBLY	Factor:1.0000						
	Subtotal Direct Costs		2,806	1,253	587	0	4,645
	Subcontractor Markups		706	344	131	0	1,180
	Prime Contractor Markups		1,444	657	295	0	2,395
TOTAL A111AC11 FOUNDATIONS		17 HRS	4,955	2,253	1,012	0	8,221
6.00 EA	*Level Unit Cost-->*		*825.91*	*375.52*	*168.73*	*0.00*	*1,370.15*
A111AC12 DEMO OF SOG AT ENTRY	*LEVEL CONTRACTOR ID APPLIED--PRIME*						
	Slab Demo		2.62	4.55	9.78	0.00	16.95
SUB-311/311	0.061 hrs/unit 73 TOTAL HRS	1,200.00 SF	3,146	5,459	11,730	0	20,335
* LINE ITEM ASSEMBLY	Factor:1.0000						
	Subtotal Direct Costs		3,146	5,459	11,730	0	20,335
	Subcontractor Markups		791	1,498	2,617	0	4,906
	Prime Contractor Markups		1,619	2,861	5,900	0	10,379
TOTAL A111AC12 DEMO OF SOG AT ENTRY		73 HRS	5,556	9,817	20,247	0	35,620
1,200.00 SF	*Level Unit Cost-->*		*4.63*	*8.18*	*16.87*	*0.00*	*29.68*
A111AC13 SOG REPLACEMENT	*LEVEL CONTRACTOR ID APPLIED--PRIME*						
	Slab On Grade Replacement		7.51	6.34	2.13	0.00	15.98
SUB-311/311	0.085 hrs/unit 102 TOTAL HRS	1,200.00 SF	9,012	7,607	2,553	0	19,172
* LINE ITEM ASSEMBLY	Factor:1.0000						
	Subtotal Direct Costs		9,012	7,607	2,553	0	19,172
	Subcontractor Markups		2,267	2,087	570	0	4,924
	Prime Contractor Markups		4,638	3,986	1,284	0	9,908
TOTAL A111AC13 SOG REPLACEMENT		102 HRS	15,918	13,679	4,407	0	34,004
1,200.00 SF	*Level Unit Cost-->*		*13.26*	*11.40*	*3.67*	*0.00*	*28.34*
A111AC14 DEMO STRUCTURE	*LEVEL CONTRACTOR ID APPLIED--PRIME*						
	Demo Structure		9.21	10.06	16.68	0.00	35.94
SUB-311/111	0.135 hrs/unit 162 TOTAL HRS	1,200.00 SF	11,053	12,071	20,010	0	43,134
* LINE ITEM ASSEMBLY	Factor:1.0000						
	Subtotal Direct Costs		11,053	12,071	20,010	0	43,134
	Subcontractor Markups		2,781	3,312	4,465	0	10,557
	Prime Contractor Markups		5,688	6,325	10,064	0	22,078
TOTAL A111AC14 DEMO STRUCTURE		162 HRS	19,522	21,708	34,539	0	75,769
1,200.00 SF	*Level Unit Cost-->*		*16.27*	*18.09*	*28.78*	*0.00*	*63.14*
A111AC15 W12x96 (8 EA TOTAL)	*LEVEL CONTRACTOR ID APPLIED--PRIME*						
	Structural Steel		1.20	0.97	0.75	0.00	2.93
SUB-511/511	0.015 hrs/unit 171 TOTAL HRS	11,424.00 LBS	13,760	11,127	8,539	0	33,426
* LINE ITEM ASSEMBLY	Factor:96.0000						

CODE SUB/CREW	DESCRIPTION	QTY UM	TOTAL COSTS MATERIAL	LABOR	EQUIPMENT	UNIT COST (SUB QUOTE)	TOTAL
A111AC NEW 2-STORY STEEL MOMENT FRAME							
A111AC15 W12x96 (8 EA TOTAL)	*LEVEL CONTRACTOR ID APPLIED--PRIME*						
	Subtotal Direct Costs		13,760	11,127	8,539	0	33,426
	Subcontractor Markups		3,462	3,053	1,905	0	8,420
	Prime Contractor Markups		7,081	5,831	4,295	0	17,207
TOTAL A111AC15 W12x96 (8 EA TOTAL)		171 HRS	24,303	20,011	14,740	0	59,053
119.00 LF	*Level Unit Cost-->*		*204.23*	*168.16*	*123.86*	*0.00*	*496.25*
A111AC16 W14x132	*LEVEL CONTRACTOR ID APPLIED--PRIME*						
	Structural Steel		1.20	0.97	0.75	0.00	2.93
SUB-511/511	0.015 hrs/unit 216 TOTAL HRS	14,400.00 LBS	17,344	14,026	10,764	0	42,134
* LINE ITEM ASSEMBLY	Factor:96.0000						
	Subtotal Direct Costs		17,344	14,026	10,764	0	42,134
	Subcontractor Markups		4,363	3,848	2,402	0	10,613
	Prime Contractor Markups		8,926	7,350	5,414	0	21,690
TOTAL A111AC16 W14x132		216 HRS	30,634	25,224	18,580	0	74,437
150.00 LF	*Level Unit Cost-->*		*204.23*	*168.16*	*123.86*	*0.00*	*496.25*
A111AC17 RESTORE STRUCTURE @ ENTRY	*LEVEL CONTRACTOR ID APPLIED--PRIME*						
	Restore Entry Structure		9.64	4.62	2.13	0.00	16.39
SUB-311/311	0.062 hrs/unit 74 TOTAL HRS	1,200.00 SF	11,563	5,548	2,553	0	19,664
* LINE ITEM ASSEMBLY	Factor:1.0000						
	Subtotal Direct Costs		11,563	5,548	2,553	0	19,664
	Subcontractor Markups		2,909	1,522	570	0	5,001
	Prime Contractor Markups		5,951	2,907	1,284	0	10,142
TOTAL A111AC17 RESTORE STRUCTURE @ ENTRY		74 HRS	20,423	9,978	4,407	0	34,807
1,200.00 SF	*Level Unit Cost-->*		*17.02*	*8.31*	*3.67*	*0.00*	*29.01*
SUBTOTAL A111AC NEW 2-STORY STEEL MOMENT FRAME			68,683	57,091	56,736	0	182,510
MARKUP			*1.766*	*1.798*	*1.726*	*0.000*	*1.764*
TOTAL A111AC NEW 2-STORY STEEL MOMENT FRAME			121,310	102,670	97,932	0	321,911
A111AD 2-STORY SHEAR WALL							
A111AD11 SLAB DEMO	*LEVEL CONTRACTOR ID APPLIED--PRIME*						
* LEVEL IS AN ASSEMBLY WITH UOM OF 6							
	Slab Demo		2.62	4.55	9.78	0.00	16.95
SUB-311/311	0.061 hrs/unit 90 TOTAL HRS	1,470.00 SF	3,854	6,687	14,369	0	24,910
* LINE ITEM ASSEMBLY	Factor:1.0000						
	Subtotal Direct Costs		3,854	6,687	14,369	0	24,910
	Subcontractor Markups		969	1,835	3,206	0	6,010
	Prime Contractor Markups		1,983	3,504	7,227	0	12,715
TOTAL A111AD11 SLAB DEMO		90 HRS	6,806	12,026	24,803	0	43,635
1,470.00 SF	*Level Unit Cost-->*		*4.63*	*8.18*	*16.87*	*0.00*	*29.68*
A111AD12 SHEAR WALL FOUNDATIONS	*LEVEL CONTRACTOR ID APPLIED--PRIME*						
* LEVEL IS AN ASSEMBLY WITH UOM OF 1							
	Concrete		467.61	208.81	97.75	0.00	774.17
SUB-311/311	2.8 hrs/unit 172 TOTAL HRS	61.25 CY	28,641	12,790	5,987	0	47,418
* LINE ITEM ASSEMBLY	Factor:0.2500						
	Subtotal Direct Costs		28,641	12,790	5,987	0	47,418
	Subcontractor Markups		7,206	3,509	1,336	0	12,050
	Prime Contractor Markups		14,740	6,702	3,011	0	24,454
TOTAL A111AD12 SHEAR WALL FOUNDATIONS		172 HRS	50,587	23,000	10,334	0	83,922
245.00 LF	*Level Unit Cost-->*		*206.48*	*93.88*	*42.18*	*0.00*	*342.54*
A111AD13 SOG REPLACEMENT	*LEVEL CONTRACTOR ID APPLIED--PRIME*						
* LEVEL IS AN ASSEMBLY WITH UOM OF 6							
	Slab On Grade Replacement		7.51	6.34	2.13	0.00	15.98
SUB-311/311	0.085 hrs/unit 125 TOTAL HRS	1,470.00 SF	11,040	9,318	3,127	0	23,485
* LINE ITEM ASSEMBLY	Factor:1.0000						

CODE SUB/CREW	DESCRIPTION	QTY UM	TOTAL COSTS MATERIAL	LABOR	EQUIPMENT	UNIT COST (SUB QUOTE)	TOTAL
A111AD 2-STORY SHEAR WALL							
A111AD13 SOG REPLACEMENT	*LEVEL CONTRACTOR ID APPLIED--PRIME*						
* LEVEL IS AN ASSEMBLY WITH UOM OF 6							
	Subtotal Direct Costs		11,040	9,318	3,127	0	23,485
	Subcontractor Markups		2,777	2,556	698	0	6,032
	Prime Contractor Markups		5,682	4,883	1,573	0	12,138
TOTAL A111AD13 SOG REPLACEMENT		125 HRS	19,499	16,757	5,398	0	41,655
1,470.00 SF	*Level Unit Cost-->*		*13.26*	*11.40*	*3.67*	*0.00*	*28.34*
A111AD14 NEW 2-STORY SHEAR WALL	*LEVEL CONTRACTOR ID APPLIED--PRIME*						
* LEVEL IS AN ASSEMBLY WITH UOM OF 1							
	Shear Wall Incl Wood Framing - Plywood		8.22	4.73	2.65	0.00	15.59
	SUB-911/911 0.069 hrs/unit 423 TOTAL HRS	6,125.00 SF	50,339	28,980	16,201	0	95,519
	* LINE ITEM ASSEMBLY Factor:25.0000						
	Subtotal Direct Costs		50,339	28,980	16,201	0	95,519
	Subcontractor Markups		12,664	7,950	3,615	0	24,230
	Prime Contractor Markups		25,907	15,186	8,148	0	49,241
TOTAL A111AD14 NEW 2-STORY SHEAR WALL		423 HRS	88,910	52,116	27,964	0	168,990
245.00 LF	*Level Unit Cost-->*		*362.90*	*212.72*	*114.14*	*0.00*	*689.75*
A111AD15 DRYWALL - FINISHES	*LEVEL CONTRACTOR ID APPLIED--PRIME*						
* LEVEL IS AN ASSEMBLY WITH UOM OF 50							
	Drywall		3.26	1.92	0.40	0.00	5.58
	SUB-911/911 0.028 hrs/unit 343 TOTAL HRS	12,250.00 SF	39,924	23,520	4,931	0	68,374
	* LINE ITEM ASSEMBLY Factor:1.0000						
	Paint		0.64	0.71	0.17	0.00	1.52
	SUB-991/991 0.012 hrs/unit 147 TOTAL HRS	12,250.00 SF	7,811	8,648	2,113	0	18,572
	* LINE ITEM ASSEMBLY Factor:1.0000						
	Subtotal Direct Costs		47,735	32,167	7,044	0	86,946
	Subcontractor Markups		12,009	8,825	1,572	0	22,406
	Prime Contractor Markups		24,567	16,856	3,543	0	44,966
TOTAL A111AD15 DRYWALL - FINISHES		490 HRS	84,312	57,848	12,158	0	154,318
12,250.00 SF	*Level Unit Cost-->*		*6.88*	*4.72*	*0.99*	*0.00*	*12.60*
A111AD16 WALL DEMO	*LEVEL CONTRACTOR ID APPLIED--PRIME*						
* LEVEL IS AN ASSEMBLY WITH UOM OF 25							
	Wall Demo		3.37	3.29	0.98	0.00	7.64
	SUB-911/911 0.048 hrs/unit 294 TOTAL HRS	6,125.00 SF	20,656	20,160	5,987	0	46,803
	* LINE ITEM ASSEMBLY Factor:1.0000						
	Subtotal Direct Costs		20,656	20,160	5,987	0	46,803
	Subcontractor Markups		5,197	5,531	1,336	0	12,063
	Prime Contractor Markups		10,631	10,564	3,011	0	24,206
TOTAL A111AD16 WALL DEMO		294 HRS	36,484	36,254	10,334	0	83,073
6,125.00 SF	*Level Unit Cost-->*		*5.96*	*5.92*	*1.69*	*0.00*	*13.56*
SUBTOTAL A111AD 2-STORY SHEAR WALL			162,265	110,102	52,715	0	325,082
MARKUP			*1.766*	*1.798*	*1.726*	*0.000*	*1.771*
TOTAL A111AD 2-STORY SHEAR WALL			286,598	198,002	90,992	0	575,592
A111AE STRENGTHEN EXISTING 2-STORY SHEAR WALL							
A111AE11 STRENGTHEN EXISTING 2-STORY SHEAR WALL	*LEVEL CONTRACTOR ID APPLIED--PRIME*						
* LEVEL IS AN ASSEMBLY WITH UOM OF 25							
	Strengthen Existing 2-Story Shear Wall		3.33	4.66	1.55	0.00	9.55
	SUB-911/911 0.068 hrs/unit 337 TOTAL HRS	4,950.00 SF	16,483	23,081	7,685	0	47,249
	* LINE ITEM ASSEMBLY Factor:1.0000						
	Subtotal Direct Costs		16,483	23,081	7,685	0	47,249
	Subcontractor Markups		4,147	6,332	1,715	0	12,194
	Prime Contractor Markups		8,483	12,095	3,865	0	24,443
TOTAL A111AE11 STRENGTHEN EXISTING 2-STORY SHEAR WALL		337 HRS	29,113	41,508	13,265	0	83,886
4,950.00 SF	*Level Unit Cost-->*		*5.88*	*8.39*	*2.68*	*0.00*	*16.95*
A111AE12 WALL DEMO	*LEVEL CONTRACTOR ID APPLIED--PRIME*						
* LEVEL IS AN ASSEMBLY WITH UOM OF 25							
	Wall Demo		3.37	3.29	0.98	0.00	7.64
	SUB-911/911 0.048 hrs/unit 238 TOTAL HRS	4,950.00 SF	16,694	16,292	4,839	0	37,825

CODE SUB/CREW	DESCRIPTION	QTY UM	TOTAL COSTS MATERIAL	LABOR	EQUIPMENT	UNIT COST (SUB QUOTE)	TOTAL
A111AE	**STRENGTHEN EXISTING 2-STORY SHEAR WALL**						
A111AE12	WALL DEMO *LEVEL CONTRACTOR ID APPLIED--PRIME*						
	* LEVEL IS AN ASSEMBLY WITH UOM OF 25						
	* LINE ITEM ASSEMBLY Factor:1.0000						
	Subtotal Direct Costs		16,694	16,292	4,839	0	37,825
	Subcontractor Markups		4,200	4,470	1,080	0	9,749
	Prime Contractor Markups		8,591	8,537	2,434	0	19,563
TOTAL A111AE12 WALL DEMO		238 HRS	29,485	29,299	8,352	0	67,136
4,950.00 SF	*Level Unit Cost-->*		*5.96*	*5.92*	*1.69*	*0.00*	*13.56*
A111AE13	DRYWALL - FINISHES *LEVEL CONTRACTOR ID APPLIED--PRIME*						
	* LEVEL IS AN ASSEMBLY WITH UOM OF 50						
	Drywall		3.26	1.92	0.40	0.00	5.58
	SUB-911/911 0.028 hrs/unit	277 TOTAL HRS 9,900.00 SF	32,265	19,008	3,985	0	55,258
	* LINE ITEM ASSEMBLY Factor:1.0000						
	Paint		0.64	0.71	0.17	0.00	1.52
	SUB-991/991 0.012 hrs/unit	119 TOTAL HRS 9,900.00 SF	6,313	6,989	1,708	0	15,009
	* LINE ITEM ASSEMBLY Factor:1.0000						
	Subtotal Direct Costs		38,578	25,996	5,693	0	70,267
	Subcontractor Markups		9,706	7,132	1,270	0	18,108
	Prime Contractor Markups		19,854	13,622	2,863	0	36,340
TOTAL A111AE13 DRYWALL - FINISHES		396 HRS	68,138	46,751	9,826	0	124,714
9,900.00 SF	*Level Unit Cost-->*		*6.88*	*4.72*	*0.99*	*0.00*	*12.60*
SUBTOTAL A111AE STRENGTHEN EXISTING 2-STORY SHEAR WALL			71,755	65,370	18,216	0	155,340
MARKUP			*1.766*	*1.798*	*1.726*	*0.000*	*1.775*
TOTAL A111AE STRENGTHEN EXISTING 2-STORY SHEAR WALL			126,736	117,558	31,443	0	275,736
A111AF	**SHEAR WALL ON INT OF EXT WALL**						
A111AF11	NEW 2-STORY SHEAR WALL *LEVEL CONTRACTOR ID APPLIED--PRIME*						
	* LEVEL IS AN ASSEMBLY WITH UOM OF 1						
	Strengthen Existing 2-Story Shear Wall		3.33	4.66	1.55	0.00	9.55
	SUB-911/911 0.068 hrs/unit	486 TOTAL HRS 7,142.00 SF	23,783	33,302	11,088	0	68,172
	* LINE ITEM ASSEMBLY Factor:1.0000						
	Subtotal Direct Costs		23,783	33,302	11,088	0	68,172
	Subcontractor Markups		5,983	9,136	2,474	0	17,593
	Prime Contractor Markups		12,240	17,451	5,577	0	35,267
TOTAL A111AF11 NEW 2-STORY SHEAR WALL		486 HRS	42,006	59,888	19,139	0	121,033
7,142.00 SF	*Level Unit Cost-->*		*5.88*	*8.39*	*2.68*	*0.00*	*16.95*
A111AF12	WALL DEMO *LEVEL CONTRACTOR ID APPLIED--PRIME*						
	* LEVEL IS AN ASSEMBLY WITH UOM OF 1						
	Wall Demo		3.37	3.29	0.98	0.00	7.64
	SUB-911/911 0.048 hrs/unit	343 TOTAL HRS 7,142.00 SF	24,086	23,507	6,981	0	54,575
	* LINE ITEM ASSEMBLY Factor:1.0000						
	Subtotal Direct Costs		24,086	23,507	6,981	0	54,575
	Subcontractor Markups		6,060	6,449	1,558	0	14,066
	Prime Contractor Markups		12,396	12,318	3,511	0	28,225
TOTAL A111AF12 WALL DEMO		343 HRS	42,542	42,274	12,050	0	96,866
7,142.00 SF	*Level Unit Cost-->*		*5.96*	*5.92*	*1.69*	*0.00*	*13.56*
A111AF13	DRYWALL - FINISHES *LEVEL CONTRACTOR ID APPLIED--PRIME*						
	* LEVEL IS AN ASSEMBLY WITH UOM OF 1						
	Drywall		3.26	1.92	0.40	0.00	5.58
	SUB-911/911 0.028 hrs/unit	200 TOTAL HRS 7,142.00 SF	23,276	13,713	2,875	0	39,864
	* LINE ITEM ASSEMBLY Factor:1.0000						
	Paint		0.64	0.71	0.17	0.00	1.52
	SUB-991/991 0.012 hrs/unit	86 TOTAL HRS 7,142.00 SF	4,554	5,042	1,232	0	10,828
	* LINE ITEM ASSEMBLY Factor:1.0000						
	Subtotal Direct Costs		27,831	18,754	4,107	0	50,691
	Subcontractor Markups		7,002	5,145	916	0	13,063
	Prime Contractor Markups		14,323	9,827	2,065	0	26,216
TOTAL A111AF13 DRYWALL - FINISHES		286 HRS	49,155	33,727	7,088	0	89,970
7,142.00 SF	*Level Unit Cost-->*		*6.88*	*4.72*	*0.99*	*0.00*	*12.60*

CODE SUB/CREW	DESCRIPTION	QTY UM	TOTAL COSTS MATERIAL	LABOR	EQUIPMENT	UNIT COST (SUB QUOTE)	TOTAL
	* LEVEL IS AN ASSEMBLY WITH UOM OF 1						
	SUBTOTAL A111AF SHEAR WALL ON INT OF EXT WALL		75,699	75,563	22,176	0	173,438
	MARKUP		*1.766*	*1.798*	*1.726*	*0.000*	*1.775*
	TOTAL A111AF SHEAR WALL ON INT OF EXT WALL		133,703	135,889	38,278	0	307,869
	A111AG DEMO & RESTORE CEILINGS						
	A111AG11 CEILING DEMO *LEVEL CONTRACTOR ID APPLIED--PRIME*						
	* LEVEL IS AN ASSEMBLY WITH UOM OF 1						
	Ceilingl Demo		3.37	2.61	0.98	0.00	6.96
	SUB-911/911 0.038 hrs/unit 586 TOTAL HRS	15,434.00 SF	52,051	40,216	15,087	0	107,353
	* LINE ITEM ASSEMBLY Factor:1.0000						
	Subtotal Direct Costs		52,051	40,216	15,087	0	107,353
	Subcontractor Markups		13,095	11,033	3,366	0	27,494
	Prime Contractor Markups		26,788	21,074	7,588	0	55,450
	TOTAL A111AG11 CEILING DEMO	586 HRS	91,934	72,323	26,041	0	190,298
	15,434.00 bSF *Level Unit Cost-->*		*5.96*	*4.69*	*1.69*	*0.00*	*12.33*
	A111AG12 DRYWALL - FINISHES *LEVEL CONTRACTOR ID APPLIED--PRIME*						
	* LEVEL IS AN ASSEMBLY WITH UOM OF 1						
	Drywall		3.26	2.26	0.40	0.00	5.92
	SUB-911/911 0.033 hrs/unit 509 TOTAL HRS	15,434.00 SF	50,301	34,925	6,212	0	91,438
	* LINE ITEM ASSEMBLY Factor:1.0000						
	Paint		0.64	0.71	0.17	0.00	1.52
	SUB-991/991 0.012 hrs/unit 185 TOTAL HRS	15,434.00 SF	9,841	10,895	2,662	0	23,399
	* LINE ITEM ASSEMBLY Factor:1.0000						
	Subtotal Direct Costs		60,142	45,820	8,875	0	114,837
	Subcontractor Markups		15,131	12,570	1,980	0	29,681
	Prime Contractor Markups		30,953	24,010	4,464	0	59,426
	TOTAL A111AG12 DRYWALL - FINISHES	695 HRS	106,226	82,400	15,318	0	203,944
	15,434.00 BSF *Level Unit Cost-->*		*6.88*	*5.34*	*0.99*	*0.00*	*13.21*
	SUBTOTAL A111AG DEMO & RESTORE CEILINGS		112,193	86,036	23,961	0	222,190
	MARKUP		*1.766*	*1.798*	*1.726*	*0.000*	*1.774*
	TOTAL A111AG DEMO & RESTORE CEILINGS		198,159	154,723	41,359	0	394,242
	A111AH MEP- FP - OUTLETS - LIGHTS - GRILLS - DUCTW						
	A111AH11 ELECTRICAL *LEVEL CONTRACTOR ID APPLIED--PRIME*						
	* LEVEL IS AN ASSEMBLY WITH UOM OF 1						
	Electrical		8.93	3.12	0.98	0.00	13.02
	SUB-161/161 0.038 hrs/unit 586 TOTAL HRS	15,434.00 SF	137,781	48,118	15,087	0	200,986
	* LINE ITEM ASSEMBLY Factor:1.0000						
	Subtotal Direct Costs		137,781	48,118	15,087	0	200,986
	Subcontractor Markups		34,663	13,201	3,366	0	51,230
	Prime Contractor Markups		70,910	25,215	7,588	0	103,712
	TOTAL A111AH11 ELECTRICAL	586 HRS	243,354	86,534	26,041	0	355,928
	15,434.00 BSF *Level Unit Cost-->*		*15.77*	*5.61*	*1.69*	*0.00*	*23.06*
	A111AH12 MECHANICAL *LEVEL CONTRACTOR ID APPLIED--PRIME*						
	* LEVEL IS AN ASSEMBLY WITH UOM OF 1REF COMPLETE						
	Mechanical - Duct Work & Package Units		0.31	25.78	4.37	0.00	30.46
	SUB-152/152 0.32 hrs/unit 4939 TOTAL HRS	15,434.00 SF	4,811	397,877	67,447	0	470,135
	* LINE ITEM ASSEMBLY Factor:1.0000						
	Reconstruct Mechanical Rooms On 2 Floors 2 Hr Rated Assemblies		120.44	51.43	17.82	0.00	189.70
	SUB-911/911 0.75 hrs/unit 300 TOTAL HRS	400.00 SF	48,178	20,571	7,130	0	75,879
	Subtotal Direct Costs		52,989	418,448	74,577	0	546,014
	Subcontractor Markups		13,331	114,797	16,641	0	144,769
	Prime Contractor Markups		27,271	219,272	37,509	0	284,052
	TOTAL A111AH12 MECHANICAL	5,239 HRS	93,592	752,516	128,726	0	974,835
	15,434.00 BSF *Level Unit Cost-->*		*6.06*	*48.76*	*8.34*	*0.00*	*63.16*
	A111AH13 FIRE PROTECTION *LEVEL CONTRACTOR ID APPLIED--PRIME*						
	* LEVEL IS AN ASSEMBLY WITH UOM OF 1REF COMPLETE						
	Fire Protection		2.55	1.29	0.40	0.00	4.24
	SUB-154/154 0.018 hrs/unit 278 TOTAL HRS	15,434.00 SF	39,366	19,918	6,212	0	65,496
	* LINE ITEM ASSEMBLY Factor:1.0000						

CODE SUB/CREW	DESCRIPTION	QTY UM	TOTAL COSTS MATERIAL	LABOR	EQUIPMENT	UNIT COST (SUB QUOTE)	TOTAL
	* LEVEL IS AN ASSEMBLY WITH UOM OF 1REF COMPLETE						
	Install 4" Water Line		26.22	16.49	6.09	0.00	48.80
SUB-154/154	0.23 hrs/unit 35 TOTAL HRS	150.00 LF	3,932	2,474	914	0	7,320
	Water Line Replacement & Upgrade For Fire Protection		5.10	2.06	0.52	0.00	7.68
SUB-151/151	0.028 hrs/unit 432 TOTAL HRS	15,434.00	78,732	31,757	7,987	0	118,476
	* LINE ITEM ASSEMBLY Factor:1.0000						
	Subtotal Direct Costs		122,030	54,148	15,114	0	191,292
	Subcontractor Markups		30,701	14,855	3,372	0	48,928
	Prime Contractor Markups		62,803	28,374	7,601	0	98,779
	TOTAL A111AH13 FIRE PROTECTION	744 HRS	215,534	97,378	26,087	0	338,999
	15,434.00 BSF	*Level Unit Cost-->*	*13.96*	*6.31*	*1.69*	*0.00*	*21.96*
	SUBTOTAL A111AH MEP- FP - OUTLETS - LIGHTS - GRILLS - DUCTW		312,800	520,715	104,777	0	938,292
	MARKUP		*1.766*	*1.798*	*1.726*	*0.000*	*1.780*
	TOTAL A111AH MEP- FP - OUTLETS - LIGHTS - GRILLS - DUCTWORK		552,480	936,428	180,855	0	1,669,762
	A111AI REPLACE PLATE DAMAGED BY MOISTURE & TERMITES						
	A111AI11 DEMO REQUIRED TO REPLACE PLATE *LEVEL CONTRACTOR ID APPLIED--PRIME*						
	Building Jack(S)		0.00	4.10	17.59	0.00	21.69
SUB-111/111	0.055 hrs/unit 14 TOTAL HRS	250.00 LF	0	1,025	4,399	0	5,423
	* LINE ITEM ASSEMBLY Factor:1.0000						
	Shoring At Building Perimeter		1.20	1.86	4.37	0.00	7.44
SUB-111/111	0.025 hrs/unit 100 TOTAL HRS	4,000.00 SF	4,818	7,451	17,480	0	29,749
	* LINE ITEM ASSEMBLY Factor:16.0000						
	Removal Of Exterior Plaster		0.50	2.61	2.59	0.00	5.69
SUB-111/111	0.035 hrs/unit 105 TOTAL HRS	3,000.00 SF	1,488	7,824	7,763	0	17,074
	* LINE ITEM ASSEMBLY Factor:12.0000						
	Removal Of Load Bearing Studs		0.07	0.82	0.29	0.00	1.18
SUB-111/111	0.011 hrs/unit 33 TOTAL HRS	3,000.00 SF	213	2,459	863	0	3,534
	* LINE ITEM ASSEMBLY Factor:12.0000						
	Removal Of Plate		0.31	2.61	0.04	0.00	2.95
SUB-111/111	0.035 hrs/unit 9 TOTAL HRS	250.00 LF	78	652	9	0	739
	* LINE ITEM ASSEMBLY Factor:1.0000						
	Debris Removal		538.46	0.00	0.00	0.00	538.46
SUB-111/NoCrew		5.00 LDS	2,692	0	0	0	2,692
	Subtotal Direct Costs		9,288	19,410	30,512	0	59,211
	Subcontractor Markups		2,337	5,325	6,808	0	14,470
	Prime Contractor Markups		4,780	10,171	15,346	0	30,298
	TOTAL A111AI11 DEMO REQUIRED TO REPLACE PLATE	261 HRS	16,406	34,907	52,667	0	103,980
	250.00 LF	*Level Unit Cost-->*	*65.62*	*139.63*	*210.67*	*0.00*	*415.92*
	A111AI12 REPLACE PLATE - STUDS - PLASTER *LEVEL CONTRACTOR ID APPLIED--PRIME*						
	Replace Plate "Treated"		3.33	1.86	0.44	0.00	5.63
SUB-311/311	0.025 hrs/unit 6 TOTAL HRS	250.00 LF	832	466	109	0	1,408
	* LINE ITEM ASSEMBLY Factor:1.0000						
	Replace Studs		2.06	1.34	0.86	0.00	4.26
SUB-311/311	0.018 hrs/unit 54 TOTAL HRS	3,000.00 LF	6,164	4,027	2,588	0	12,779
	* LINE ITEM ASSEMBLY Factor:12.0000						
	Restore Exterior Plaster		9.07	6.29	3.39	0.00	18.75
SUB-421/421	0.085 hrs/unit 255 TOTAL HRS	3,000.00 SF	27,206	18,880	10,178	0	56,264
	* LINE ITEM ASSEMBLY Factor:12.0000						
	Install Stud Clips		2.06	0.90	0.98	0.00	3.93
SUB-311/311	0.012 hrs/unit 12 TOTAL HRS	1,000.00 EA	2,055	895	978	0	3,927
	* LINE ITEM ASSEMBLY Factor:4.0000						
	Install H8 Ties Stud To Top Plate		4.25	0.60	0.52	0.00	5.37
SUB-311/311	0.008 hrs/unit 2 TOTAL HRS	250.00 EA	1,063	149	129	0	1,341
	* LINE ITEM ASSEMBLY Factor:1.0000						
	Paint Exterior		0.64	0.71	0.17	0.00	1.52
SUB-991/991	0.012 hrs/unit 36 TOTAL HRS	3,000.00 SF	1,913	2,118	518	0	4,548
	* LINE ITEM ASSEMBLY Factor:12.0000						
	Subtotal Direct Costs		39,233	26,535	14,499	0	80,267
	Subcontractor Markups		9,870	7,280	3,235	0	20,385
	Prime Contractor Markups		20,192	13,905	7,292	0	41,389
	TOTAL A111AI12 REPLACE PLATE - STUDS - PLASTER	365 HRS	69,295	47,720	25,026	0	142,041
	250.00 LF	*Level Unit Cost-->*	*277.18*	*190.88*	*100.10*	*0.00*	*568.16*
	A111AI13 REINFORCE STUD - TOP PLATE CONNECTION *LEVEL CONTRACTOR ID APPLIED--PRIME*						
	Install H8 Ties Stud To Top Plate		4.25	0.60	0.52	0.00	5.37
SUB-311/311	0.008 hrs/unit 40 TOTAL HRS	5,000.00 EA	21,255	2,983	2,588	0	26,826

CODE SUB/CREW	DESCRIPTION	QTY UM	TOTAL COSTS MATERIAL	LABOR	EQUIPMENT	UNIT COST (SUB QUOTE)	TOTAL
A111AI	**REPLACE PLATE DAMAGED BY MOISTURE & TERMITES**						
A111AI13	REINFORCE STUD - TOP PLATE CONNECTION *LEVEL CONTRACTOR ID APPLIED--PRIME*						
	* LINE ITEM ASSEMBLY Factor:1.0000						
	Subtotal Direct Costs		21,255	2,983	2,588	0	26,826
	Subcontractor Markups		5,347	818	577	0	6,743
	Prime Contractor Markups		10,939	1,563	1,301	0	13,804
	TOTAL A111AI13 REINFORCE STUD - TOP PLATE CONNECTION	40 HRS	37,541	5,365	4,466	0	47,372
	5,000.00 LF *Level Unit Cost-->*		*7.51*	*1.07*	*0.89*	*0.00*	*9.47*
	SUBTOTAL A111AI REPLACE PLATE DAMAGED BY MOISTURE & TERMITES		69,777	48,929	47,599	0	166,304
	MARKUP		*1.766*	*1.798*	*1.726*	*0.000*	*1.764*
	TOTAL A111AI REPLACE PLATE DAMAGED BY MOISTURE & TERMITES IS		123,242	87,991	82,160	0	293,393
A112	**ACCESSIBLE PATH**						
A112AA	**COMPLIANT PARKING LAYOUT W/ MARKING & SIGNS**						
A112AA11	AC OVERLAY - CO-PLANE *LEVEL CONTRACTOR ID APPLIED--PRIME*						
	* LEVEL IS AN ASSEMBLY WITH UOM OF 1						
	Ac Overlay Incl Co-Plane		3.97	1.38	0.98	0.00	6.33
	SUB-221/221 0.018 hrs/unit	628 TOTAL HRS 34,881.00 SF	138,394	48,224	34,096	0	220,714
	* LINE ITEM ASSEMBLY Factor:1.0000						
	Subtotal Direct Costs		138,394	48,224	34,096	0	220,714
	Subcontractor Markups		34,817	13,230	7,608	0	55,655
	Prime Contractor Markups		71,225	25,270	17,149	0	113,644
	TOTAL A112AA11 AC OVERLAY - CO-PLANE	628 HRS	244,436	86,724	58,853	0	390,013
	34,881.00 SF *Level Unit Cost-->*		*7.01*	*2.49*	*1.69*	*0.00*	*11.18*
A112AA12	RESTRIPE - SIGNAGE *LEVEL CONTRACTOR ID APPLIED--PRIME*						
	Stripping		0.64	0.63	0.17	0.00	1.44
	SUB-221/221 0.008 hrs/unit	16 TOTAL HRS 1,980.00 LF	1,263	1,247	342	0	2,851
	* LINE ITEM ASSEMBLY Factor:22.0000						
	Hc Stalls - Markers		1.63	0.65	0.17	0.00	2.45
	SUB-221/221 0.009 hrs/unit	2 TOTAL HRS 180.00 LF	293	118	31	0	442
	Signage		191.29	34.56	97.75	0.00	323.61
	SUB-221/221 0.45 hrs/unit	3 TOTAL HRS 6.00 EA	1,148	207	587	0	1,942
	Subtotal Direct Costs		2,704	1,572	959	0	5,235
	Subcontractor Markups		680	431	214	0	1,325
	Prime Contractor Markups		1,391	824	482	0	2,698
	TOTAL A112AA12 RESTRIPE - SIGNAGE	20 HRS	4,775	2,827	1,655	0	9,258
	90.00 STALLS *Level Unit Cost-->*		*53.06*	*31.41*	*18.39*	*0.00*	*102.86*
	SUBTOTAL A112AA COMPLIANT PARKING LAYOUT W/ MARKING & SIGNS		141,097	49,796	35,055	0	225,949
	MARKUP		*1.766*	*1.798*	*1.726*	*0.000*	*1.767*
	TOTAL A112AA COMPLIANT PARKING LAYOUT W/ MARKING & SIGNS		249,212	89,550	60,509	0	399,271
A112AB	**WIDEN SIDEWALKS TO 5Æ AT THE EAST ELEVATION**						
A112AB11	WIDEN SIDEWALKS TO 5Æ AT THE EAST ELEVATION *LEVEL CONTRACTOR ID APPLIED--PRIME*						
	* LEVEL IS AN ASSEMBLY WITH UOM OF 1						
	Slab - Curb Demo		2.62	4.55	9.78	0.00	16.95
	SUB-311/311 0.061 hrs/unit	66 TOTAL HRS 1,080.00 SF	2,831	4,913	10,557	0	18,301
	* LINE ITEM ASSEMBLY Factor:8.0000						
	Slab On Grade Replacement		7.51	6.34	2.13	0.00	15.98
	SUB-311/311 0.085 hrs/unit	69 TOTAL HRS 810.00 SF	6,083	5,135	1,723	0	12,941
	* LINE ITEM ASSEMBLY Factor:6.0000						
	Curb Replacement		12.04	6.86	2.65	0.00	21.55
	SUB-311/311 0.092 hrs/unit	12 TOTAL HRS 135.00 LF	1,626	926	357	0	2,909
	* LINE ITEM ASSEMBLY Factor:1.0000						
	Subtotal Direct Costs		10,540	10,974	12,637	0	34,151
	Subcontractor Markups		2,652	3,011	2,820	0	8,482
	Prime Contractor Markups		5,425	5,750	6,356	0	17,531
	TOTAL A112AB11 WIDEN SIDEWALKS TO 5Æ AT THE EAST ELEVAT	147 HRS	18,617	19,735	21,813	0	60,165
	135.00 LF *Level Unit Cost-->*		*137.90*	*146.18*	*161.58*	*0.00*	*445.66*

CODE SUB/CREW	DESCRIPTION	QTY UM	TOTAL COSTS MATERIAL	LABOR	EQUIPMENT	UNIT COST (SUB QUOTE)	TOTAL
	* LEVEL IS AN ASSEMBLY WITH UOM OF 1						
	SUBTOTAL A112AB WIDEN SIDEWALKS TO 5Æ AT THE EAST ELEVATION		10,540	10,974	12,637	0	34,151
	MARKUP		*1.766*	*1.798*	*1.726*	*0.000*	*1.762*
	TOTAL A112AB WIDEN SIDEWALKS TO 5Æ AT THE EAST ELEVATION		18,617	19,735	21,813	0	60,165
	A112AC MODIFY EXTERIOR DOORWAYS AT THE EAST ELEVATI						
	A112AC11 MODIFY EXTERIOR DOORWAYS AT THE EAST ELEVATION	*LEVEL CONTRACTOR ID APPLIED--PRIME*					
	Doorway Modification		4959.50	1062.85	287.50	0.00	6,309.85
	SUB-911/911 15.5 hrs/unit 47 TOTAL HRS	3.00 EA	14,879	3,189	863	0	18,930
	* LINE ITEM ASSEMBLY Factor:1.0000						
	Subtotal Direct Costs		14,879	3,189	863	0	18,930
	Subcontractor Markups		3,743	875	192	0	4,810
	Prime Contractor Markups		7,657	1,671	434	0	9,762
	TOTAL A112AC11 MODIFY EXTERIOR DOORWAYS AT THE EAST ELEVATION	47 HRS	26,279	5,734	1,489	0	33,502
	3.00 EA Level Unit Cost--->		*8,759.65*	*1,911.37*	*496.25*	*0.00*	*11,167.28*
	SUBTOTAL A112AC MODIFY EXTERIOR DOORWAYS AT THE EAST ELEVATI		14,879	3,189	863	0	18,930
	MARKUP		*1.766*	*1.798*	*1.726*	*0.000*	*1.770*
	TOTAL A112AC MODIFY EXTERIOR DOORWAYS AT THE EAST ELEVATION		26,279	5,734	1,489	0	33,502
	A112AD FLOOR MOUNTED HANDRAIL AT COURTYARD STEPS						
	A112AD11 FLOOR MOUNTED HANDRAIL AT COURTYARD STEPS	*LEVEL CONTRACTOR ID APPLIED--PRIME*					
	New Hand Rail		92.11	42.21	5.17	0.00	139.49
	SUB-511/511 0.65 hrs/unit 8 TOTAL HRS	12.00 LF	1,105	506	62	0	1,674
	* LINE ITEM ASSEMBLY Factor:1.0000						
	Subtotal Direct Costs		1,105	506	62	0	1,674
	Subcontractor Markups		278	139	14	0	431
	Prime Contractor Markups		569	265	31	0	865
	TOTAL A112AD11 FLOOR MOUNTED HANDRAIL AT COURTYARD STEPS	8 HRS	1,952	911	107	0	2,970
	12.00 LF Level Unit Cost--->		*162.68*	*75.90*	*8.93*	*0.00*	*247.52*
	SUBTOTAL A112AD FLOOR MOUNTED HANDRAIL AT COURTYARD STEPS		1,105	506	62	0	1,674
	MARKUP		*1.766*	*1.798*	*1.726*	*0.000*	*1.774*
	TOTAL A112AD FLOOR MOUNTED HANDRAIL AT COURTYARD STEPS		1,952	911	107	0	2,970
	A112AE CONCRETE CURB OR A WELDED STEEL PLATE AT COU						
	A112AE11 CONCRETE CURB OR A WELDED STEEL PLATE AT COURTYARD RAMP (AP	*LEVEL CONTRACTOR ID APPLIED--PRIME*					
	Curb Replacement		53.85	85.76	17.25	0.00	156.86
	SUB-311/311 1.15 hrs/unit 3 TOTAL HRS	3.00 LF	162	257	52	0	471
	* LINE ITEM ASSEMBLY Factor:1.0000						
	Subtotal Direct Costs		162	257	52	0	471
	Subcontractor Markups		41	71	12	0	123
	Prime Contractor Markups		83	135	26	0	244
	TOTAL A112AE11 CONCRETE CURB OR A WELDED STEEL PLATE AT COURTYARD RAMP (APPROX 3 LF)	3 HRS	285	463	89	0	837
	3.00 LF Level Unit Cost--->		*95.10*	*154.23*	*29.78*	*0.00*	*279.11*
	SUBTOTAL A112AE CONCRETE CURB OR A WELDED STEEL PLATE AT COU		162	257	52	0	471
	MARKUP		*1.766*	*1.798*	*1.726*	*0.000*	*1.779*
	TOTAL A112AE CONCRETE CURB OR A WELDED STEEL PLATE AT COURTY		285	463	89	0	837
	A112AF POST MOUNTED HORIZ RAIL OR A LANDSCAPE ELEME						
	A112AF11 POST MOUNTED HORIZ RAIL OR A LANDSCAPE ELEMENT (36 SF)	*LEVEL CONTRACTOR ID APPLIED--PRIME*					
	New Hand Rail		92.11	42.21	5.17	0.00	139.49
	SUB-511/511 0.65 hrs/unit 4 TOTAL HRS	6.00 LF	553	253	31	0	837
	* LINE ITEM ASSEMBLY Factor:1.0000						
	Subtotal Direct Costs		553	253	31	0	837
	Subcontractor Markups		139	69	7	0	215
	Prime Contractor Markups		284	133	16	0	433
	TOTAL A112AF11 POST MOUNTED HORIZ RAIL OR A LANDSCAPE ELEMENT (36 SF)	4 HRS	976	455	54	0	1,485
	6.00 LF Level Unit Cost--->		*162.68*	*75.90*	*8.93*	*0.00*	*247.52*

CODE SUB/CREW	DESCRIPTION	QTY UM	TOTAL COSTS MATERIAL	LABOR	EQUIPMENT	UNIT COST (SUB QUOTE)	TOTAL
A112AF	**POST MOUNTED HORIZ RAIL OR A LANDSCAPE ELEME**						
A112AF11	POST MOUNTED HORIZ RAIL OR A LANDSCAPE ELEMENT (36 SF)	*LEVEL CONTRACTOR ID APPLIED--PRIME*					
	SUBTOTAL A112AF POST MOUNTED HORIZ RAIL OR A LANDSCAPE ELEME		553	253	31	0	837
	MARKUP		*1.766*	*1.798*	*1.726*	*0.000*	*1.774*
	TOTAL A112AF POST MOUNTED HORIZ RAIL OR A LANDSCAPE ELEMENT		976	455	54	0	1,485
A112AG	**HANDRAILS FOR THE RAMP LEADING TO THE CMU A**						
A112AG11	HANDRAILS FOR THE RAMP LEADING TO THE CMU ADDITION. (13 LF	*LEVEL CONTRACTOR ID APPLIED--PRIME*					
	New Hand Rail		92.11	42.21	5.17	0.00	139.49
	SUB-511/511 0.65 hrs/unit 17 TOTAL HRS	26.00 LF	2,395	1,097	135	0	3,627
	* LINE ITEM ASSEMBLY Factor:1.0000						
	Subtotal Direct Costs		2,395	1,097	135	0	3,627
	Subcontractor Markups		602	301	30	0	934
	Prime Contractor Markups		1,232	575	68	0	1,875
	TOTAL A112AG11 HANDRAILS FOR THE RAMP LEADING TO THE CMU ADDITION. (13 LF EACH SIDE)	17 HRS	4,230	1,974	232	0	6,435
			162.68	*75.90*	*8.93*	*0.00*	*247.52*
	26.00 LF	*Level Unit Cost-->*					
	SUBTOTAL A112AG HANDRAILS FOR THE RAMP LEADING TO THE CMU AD		2,395	1,097	135	0	3,627
	MARKUP		*1.766*	*1.798*	*1.726*	*0.000*	*1.774*
	TOTAL A112AG HANDRAILS FOR THE RAMP LEADING TO THE CMU ADDIT		4,230	1,974	232	0	6,435
A113	**PLUMBING**						
A113AA	**UPGRADE THE MENÆS ROOM ON 1ST FLOOR TO COMPL**						
A113AA11	UPGRADE THE MENÆS ROOM ON 1ST FLOOR TO COMPLIANCE	*LEVEL CONTRACTOR ID APPLIED--PRIME*					
	Upgrade The MenÆS Room On 1St Floor To Compliance		87.85	33.91	17.82	0.00	139.59
	SUB-153/153 0.48 hrs/unit 65 TOTAL HRS	136.00 SF	11,948	4,611	2,424	0	18,984
	* LINE ITEM ASSEMBLY Factor:1.0000						
	Subtotal Direct Costs		11,948	4,611	2,424	0	18,984
	Subcontractor Markups		3,006	1,265	541	0	4,812
	Prime Contractor Markups		6,149	2,416	1,219	0	9,785
	TOTAL A113AA11 UPGRADE THE MENÆS ROOM ON 1ST FLOOR TO COMPLIANCE	65 HRS	21,103	8,293	4,184	0	33,580
			155.17	*60.98*	*30.77*	*0.00*	*246.91*
	136.00 SF	*Level Unit Cost-->*					
	SUBTOTAL A113AA UPGRADE THE MENÆS ROOM ON 1ST FLOOR TO COMPL		11,948	4,611	2,424	0	18,984
	MARKUP		*1.766*	*1.798*	*1.726*	*0.000*	*1.769*
	TOTAL A113AA UPGRADE THE MENÆS ROOM ON 1ST FLOOR TO COMPLIAN		21,103	8,293	4,184	0	33,580
A113AB	**UPGRADE WOMENÆS ROOM ON 2ND FLOOR TO COMPLI**						
A113AB11	UPGRADE WOMENÆS ROOM ON 2ND FLOOR TO COMPLIANCE	*LEVEL CONTRACTOR ID APPLIED--PRIME*					
	Upgrade The WomenÆS Room On 1St Floor To Compliance		87.85	33.91	17.82	0.00	139.59
	SUB-153/153 0.48 hrs/unit 55 TOTAL HRS	115.00 SF	10,103	3,899	2,050	0	16,052
	* LINE ITEM ASSEMBLY Factor:1.0000						
	Subtotal Direct Costs		10,103	3,899	2,050	0	16,052
	Subcontractor Markups		2,542	1,070	457	0	4,069
	Prime Contractor Markups		5,200	2,043	1,031	0	8,274
	TOTAL A113AB11 UPGRADE WOMENÆS ROOM ON 2ND FLOOR TO COMPLIANCE	55 HRS	17,845	7,012	3,538	0	28,395
			155.17	*60.98*	*30.77*	*0.00*	*246.91*
	115.00 SF	*Level Unit Cost-->*					
	SUBTOTAL A113AB UPGRADE WOMENÆS ROOM ON 2ND FLOOR TO COMPLI		10,103	3,899	2,050	0	16,052
	MARKUP		*1.766*	*1.798*	*1.726*	*0.000*	*1.769*
	TOTAL A113AB UPGRADE WOMENÆS ROOM ON 2ND FLOOR TO COMPLIANC		17,845	7,012	3,538	0	28,395
A113AC	**ADD UNISEX SINGLE RESTROOM AT 1ST FLOOR**						
A113AC11	ADD UNISEX SINGLE RESTROOM AT 1ST FLOOR	*LEVEL CONTRACTOR ID APPLIED--PRIME*					
	Add Unisex Single Restroom At 1St Floor		116.19	33.91	17.82	0.00	167.93
	SUB-153/153 0.48 hrs/unit 86 TOTAL HRS	180.00 SF	20,915	6,103	3,209	0	30,227
	* LINE ITEM ASSEMBLY Factor:1.0000						

CODE SUB/CREW	DESCRIPTION	QTY UM	TOTAL COSTS MATERIAL	LABOR	EQUIPMENT	UNIT COST (SUB QUOTE)	TOTAL
A113AC	**ADD UNISEX SINGLE RESTROOM AT 1ST FLOOR**						
A113AC11	ADD UNISEX SINGLE RESTROOM AT 1ST FLOOR *LEVEL CONTRACTOR ID APPLIED--PRIME*						
	Subtotal Direct Costs		20,915	6,103	3,209	0	30,227
	Subcontractor Markups		5,262	1,674	716	0	7,652
	Prime Contractor Markups		10,764	3,198	1,614	0	15,576
	TOTAL A113AC11 ADD UNISEX SINGLE RESTROOM AT 1ST FLOOR 86 HRS		36,941	10,975	5,538	0	53,454
	180.00 SF *Level Unit Cost-->*		*205.23*	*60.97*	*30.77*	*0.00*	*296.97*
	SUBTOTAL A113AC ADD UNISEX SINGLE RESTROOM AT 1ST FLOOR		20,915	6,103	3,209	0	30,227
	MARKUP		*1.766*	*1.798*	*1.726*	*0.000*	*1.768*
	TOTAL A113AC ADD UNISEX SINGLE RESTROOM AT 1ST FLOOR		36,941	10,975	5,538	0	53,454
A113AD	**ADD UNISEX SINGLE RESTROOM AT 2ND FLOOR**						
A113AD11	ADD UNISEX SINGLE RESTROOM AT 2ND FLOOR *LEVEL CONTRACTOR ID APPLIED--PRIME*						
	Add Unisex Single Restroom At 2Nd Floor		116.19	33.91	17.82	0.00	167.92
	SUB-153/153 0.48 hrs/unit	1.00 SF	116	34	18	0	168
	* LINE ITEM ASSEMBLY Factor:1.0000						
	Subtotal Direct Costs		116	34	18	0	168
	Subcontractor Markups		29	9	4	0	43
	Prime Contractor Markups		60	18	9	0	87
	TOTAL A113AD11 ADD UNISEX SINGLE RESTROOM AT 2ND FLOOR HR		205	61	31	0	297
	SUBTOTAL A113AD ADD UNISEX SINGLE RESTROOM AT 2ND FLOOR		116	34	18	0	168
	MARKUP		*1.766*	*1.798*	*1.726*	*0.000*	*1.768*
	TOTAL A113AD ADD UNISEX SINGLE RESTROOM AT 2ND FLOOR		205	61	31	0	297
A113AE	**CODE COMPLIANT SIGNS FOR RESTROOMS**						
A113AE11	CODE COMPLIANT SIGNS FOR RESTROOMS *LEVEL CONTRACTOR ID APPLIED--PRIME*						
	Code Compliant Signs For Restrooms		85.02	19.97	4.03	0.00	109.02
	SUB-823/823 0.25 hrs/unit 1 TOTAL HRS	4.00 EA	340	80	16	0	436
	* LINE ITEM ASSEMBLY Factor:1.0000						
	Subtotal Direct Costs		340	80	16	0	436
	Subcontractor Markups		86	22	4	0	111
	Prime Contractor Markups		175	42	8	0	225
	TOTAL A113AE11 CODE COMPLIANT SIGNS FOR RESTROOMS 1 HR		601	144	28	0	772
	4.00 EA *Level Unit Cost-->*		*150.17*	*35.91*	*6.95*	*0.00*	*193.03*
	SUBTOTAL A113AE CODE COMPLIANT SIGNS FOR RESTROOMS		340	80	16	0	436
	MARKUP		*1.766*	*1.798*	*1.726*	*0.000*	*1.771*
	TOTAL A113AE CODE COMPLIANT SIGNS FOR RESTROOMS		601	144	28	0	772
A113AF	**WALL MOUNTED DRINKING FOUNTAIN AT 1ST FLOOR**						
A113AF11	WALL MOUNTED DRINKING FOUNTAIN AT 1ST FLOOR IN A NEW ALCOVE *LEVEL CONTRACTOR ID APPLIED--PRIME*						
	Mounted Drinking Fountain At 1St Floor In A New Alcove		3117.40	388.51	212.75	0.00	3,718.66
	SUB-153/153 5.5 hrs/unit 6 TOTAL HRS	1.00 EA	3,117	389	213	0	3,719
	* LINE ITEM ASSEMBLY Factor:1.0000						
	Subtotal Direct Costs		3,117	389	213	0	3,719
	Subcontractor Markups		784	107	47	0	938
	Prime Contractor Markups		1,604	204	107	0	1,915
	TOTAL A113AF11 WALL MOUNTED DRINKING FOUNTAIN AT 1ST FLOOR IN A NEW ALCOVE 6 HRS		5,506	699	367	0	6,572
	SUBTOTAL A113AF WALL MOUNTED DRINKING FOUNTAIN AT 1ST FLOOR		3,117	389	213	0	3,719
	MARKUP		*1.766*	*1.798*	*1.726*	*0.000*	*1.767*
	TOTAL A113AF WALL MOUNTED DRINKING FOUNTAIN AT 1ST FLOOR IN		5,506	699	367	0	6,572
A113AG	**PLUMBING INFRASTRUCTURE**						
A113AG11	PLUMBING INFRASTRUCTURE *LEVEL CONTRACTOR ID APPLIED--PRIME*						
	* LEVEL IS AN ASSEMBLY WITH UOM OF 1						
	Replace Sewer Line And Run New To All Spaces		49.59	24.72	20.70	0.00	95.02
	SUB-153/153 0.35 hrs/unit 245 TOTAL HRS	700.00 LF	34,717	17,306	14,490	0	66,513

CODE SUB/CREW	DESCRIPTION	QTY UM	TOTAL COSTS MATERIAL	LABOR	EQUIPMENT	UNIT COST (SUB QUOTE)	TOTAL
A113AG PLUMBING INFRASTRUCTURE							
A113AG11 PLUMBING INFRASTRUCTURE	*LEVEL CONTRACTOR ID APPLIED--PRIME*						
* LEVEL IS AN ASSEMBLY WITH UOM OF 1							
	Subtotal Direct Costs		34,717	17,306	14,490	0	66,513
	Subcontractor Markups		8,734	4,748	3,233	0	16,715
	Prime Contractor Markups		17,867	9,069	7,288	0	34,224
TOTAL A113AG11 PLUMBING INFRASTRUCTURE		245 HRS	61,318	31,123	25,011	0	117,451
15,434.00 BSF	*Level Unit Cost-->*		*3.97*	*2.02*	*1.62*	*0.00*	*7.61*
SUBTOTAL A113AG PLUMBING INFRASTRUCTURE			34,717	17,306	14,490	0	66,513
MARKUP			*1.766*	*1.798*	*1.726*	*0.000*	*1.766*
TOTAL A113AG PLUMBING INFRASTRUCTURE			61,318	31,123	25,011	0	117,451
A114 STAIRS AND BALCONY RAILING							
A114AA ADD A SOLID OR PERFORATED STEEL PANEL AT EAC							
A114AA11 ADD A SOLID OR PERFORATED STEEL PANEL AT EACH OPEN RISER	*LEVEL CONTRACTOR ID APPLIED--PRIME*						
	Add A Solid Or Perforated Steel Panel At Each Open Riser		49.59	22.73	7.47	0.00	79.80
	SUB-511/511 0.35 hrs/unit 14 TOTAL HRS	40.00 EA	1,984	909	299	0	3,192
	* LINE ITEM ASSEMBLY Factor:1.0000						
	Subtotal Direct Costs		1,984	909	299	0	3,192
	Subcontractor Markups		499	249	67	0	815
	Prime Contractor Markups		1,021	476	150	0	1,648
TOTAL A114AA11 ADD A SOLID OR PERFORATED STEEL PANEL AT EACH OPEN RISER		14 HRS	3,504	1,635	516	0	5,655
40.00 RISERS	*Level Unit Cost-->*		*87.60*	*40.87*	*12.90*	*0.00*	*141.37*
SUBTOTAL A114AA ADD A SOLID OR PERFORATED STEEL PANEL AT EAC			1,984	909	299	0	3,192
MARKUP			*1.766*	*1.798*	*1.726*	*0.000*	*1.772*
TOTAL A114AA ADD A SOLID OR PERFORATED STEEL PANEL AT EACH O			3,504	1,635	516	0	5,655
A114AB ADD CONTRASTING STRIPE AT EACH RISER							
A114AB11 ADD CONTRASTING STRIPE AT EACH RISER	*LEVEL CONTRACTOR ID APPLIED--PRIME*						
	Add Contrasting Stripe At Each Riser		6.80	11.98	1.73	0.00	20.51
	SUB-823/823 0.15 hrs/unit 6 TOTAL HRS	40.00 EA	272	479	69	0	820
	* LINE ITEM ASSEMBLY Factor:1.0000						
	Subtotal Direct Costs		272	479	69	0	820
	Subcontractor Markups		68	131	15	0	215
	Prime Contractor Markups		140	251	35	0	426
TOTAL A114AB11 ADD CONTRASTING STRIPE AT EACH RISER		6 HRS	481	862	119	0	1,462
40.00 EA	*Level Unit Cost-->*		*12.01*	*21.55*	*2.98*	*0.00*	*36.54*
SUBTOTAL A114AB ADD CONTRASTING STRIPE AT EACH RISER			272	479	69	0	820
MARKUP			*1.766*	*1.798*	*1.726*	*0.000*	*1.782*
TOTAL A114AB ADD CONTRASTING STRIPE AT EACH RISER			481	862	119	0	1,462
A114AC REPLACE EXISTING STEEL GUARDRAILS WITH NEW O							
A114AC11 REPLACE EXISTING STEEL GUARDRAILS WITH NEW ONES	*LEVEL CONTRACTOR ID APPLIED--PRIME*						
* LEVEL IS AN ASSEMBLY WITH UOM OF 1							
	New Hand Rail		92.11	42.21	5.17	0.00	139.49
	SUB-511/511 0.65 hrs/unit 114 TOTAL HRS	175.00 LF	16,118	7,386	906	0	24,410
	* LINE ITEM ASSEMBLY Factor:1.0000						
	Subtotal Direct Costs		16,118	7,386	906	0	24,410
	Subcontractor Markups		4,055	2,026	202	0	6,284
	Prime Contractor Markups		8,295	3,871	455	0	12,621
TOTAL A114AC11 REPLACE EXISTING STEEL GUARDRAILS WITH NEW ONES		114 HRS	28,469	13,283	1,563	0	43,315
175.00 LF	*Level Unit Cost-->*		*162.68*	*75.90*	*8.93*	*0.00*	*247.52*
SUBTOTAL A114AC REPLACE EXISTING STEEL GUARDRAILS WITH NEW O			16,118	7,386	906	0	24,410
MARKUP			*1.766*	*1.798*	*1.726*	*0.000*	*1.774*
TOTAL A114AC REPLACE EXISTING STEEL GUARDRAILS WITH NEW ONES			28,469	13,283	1,563	0	43,315

CODE SUB/CREW	DESCRIPTION	QTY UM	TOTAL COSTS MATERIAL	LABOR	EQUIPMENT	UNIT COST (SUB QUOTE)	TOTAL
A114AD	**REPLACE EXISTING 2ND FLOOR BALCONY GUARDRAIL**						
A114AD11	REPLACE EXISTING 2ND FLOOR BALCONY GUARDRAILS *LEVEL CONTRACTOR ID APPLIED--PRIME*						
	New Hand Rail		92.11	42.21	5.17	0.00	139.49
SUB-511/511	0.65 hrs/unit 128 TOTAL HRS	197.00 LF	18,145	8,315	1,019	0	27,479
	* LINE ITEM ASSEMBLY Factor:1.0000						
	Subtotal Direct Costs		18,145	8,315	1,019	0	27,479
	Subcontractor Markups		4,565	2,281	227	0	7,073
	Prime Contractor Markups		9,338	4,357	513	0	14,208
	TOTAL A114AD11 REPLACE EXISTING 2ND FLOOR BALCONY GUARDRAILS	128 HRS	32,048	14,953	1,760	0	48,761
	197.00 LF *Level Unit Cost-->*		*162.68*	*75.90*	*8.93*	*0.00*	*247.52*
	SUBTOTAL A114AD REPLACE EXISTING 2ND FLOOR BALCONY GUARDRAIL		18,145	8,315	1,019	0	27,479
	MARKUP		*1.766*	*1.798*	*1.726*	*0.000*	*1.774*
	TOTAL A114AD REPLACE EXISTING 2ND FLOOR BALCONY GUARDRAILS		32,048	14,953	1,760	0	48,761
A114AE	**WALL MOUNTED HANDRAIL AT EA OF 4 STAIRS BETW**						
A114AE11	WALL MOUNTED HANDRAIL AT EA OF 4 STAIRS BETWEEN 2ND FLOOR L *LEVEL CONTRACTOR ID APPLIED--PRIME*						
	New Hand Rai Wall Mountl		63.77	31.17	5.17	0.00	100.11
SUB-511/511	0.48 hrs/unit 58 TOTAL HRS	120.00 LF	7,652	3,740	621	0	12,013
	* LINE ITEM ASSEMBLY Factor:1.0000						
	Subtotal Direct Costs		7,652	3,740	621	0	12,013
	Subcontractor Markups		1,925	1,026	139	0	3,090
	Prime Contractor Markups		3,938	1,960	312	0	6,210
	TOTAL A114AE11 WALL MOUNTED HANDRAIL AT EA OF 4 STAIRS BETWEEN 2ND FLOOR LEVELS	58 HRS	13,515	6,726	1,072	0	21,313
	120.00 LF *Level Unit Cost-->*		*112.62*	*56.05*	*8.93*	*0.00*	*177.61*
	SUBTOTAL A114AE WALL MOUNTED HANDRAIL AT EA OF 4 STAIRS BETW		7,652	3,740	621	0	12,013
	MARKUP		*1.766*	*1.798*	*1.726*	*0.000*	*1.774*
	TOTAL A114AE WALL MOUNTED HANDRAIL AT EA OF 4 STAIRS BETWEEN		13,515	6,726	1,072	0	21,313
A115	**VERTICAL TRANSPORTATION**						
A115AA	**DEVELOP VERTICAL TRANSPORTATION**						
A115AA11	ADD 2 EA -2-DOOR ELEVATORS W/ 2 STOPS *LEVEL CONTRACTOR ID APPLIED--PRIME*						
	Elevators Two Door Two Stop		63765.00	21339.10	4025.00	0.00	89,129.10
SUB-141/141	215 hrs/unit 860 TOTAL HRS	4.00 STPS	255,060	85,356	16,100	0	356,516
	* LINE ITEM ASSEMBLY Factor:2.0000						
	Add Backup Generator		106275.00	9845.30	2875.00	0.00	118,995.30
SUB-161/161	120 hrs/unit 120 TOTAL HRS	1.00 EA	106,275	9,845	2,875	0	118,995
	Subtotal Direct Costs		361,335	95,202	18,975	0	475,512
	Subcontractor Markups		90,906	26,118	4,234	0	121,257
	Prime Contractor Markups		185,963	49,887	9,544	0	245,393
	TOTAL A115AA11 ADD 2 EA -2-DOOR ELEVATORS W/ 2 STOPS	980 HRS	638,203	171,206	32,753	0	842,162
	2.00 EA *Level Unit Cost-->*		*319,101.66*	*85,603.01*	*16,376.33*	*0.00*	*421,081.00*
	SUBTOTAL A115AA DEVELOP VERTICAL TRANSPORTATION		361,335	95,202	18,975	0	475,512
	MARKUP		*1.766*	*1.798*	*1.726*	*0.000*	*1.771*
	TOTAL A115AA DEVELOP VERTICAL TRANSPORTATION		638,203	171,206	32,753	0	842,162
A115AB	**ADD TWO EXTERIOR AREAS OF ASSISTED RESCUE AL**						
A115AB11	ADD TWO EXTERIOR AREAS OF ASSISTED RESCUE ALONG THE 2ND FLO *LEVEL CONTRACTOR ID APPLIED--PRIME*						
	Add Two Exterior Areas Of Assisted Rescue		63.77	22.73	9.78	0.00	96.27
SUB-511/511	0.35 hrs/unit 53 TOTAL HRS	150.00 SF	9,565	3,409	1,466	0	14,440
	* LINE ITEM ASSEMBLY Factor:1.0000						
	Subtotal Direct Costs		9,565	3,409	1,466	0	14,440
	Subcontractor Markups		2,406	935	327	0	3,669
	Prime Contractor Markups		4,923	1,786	737	0	7,446
	TOTAL A115AB11 ADD TWO EXTERIOR AREAS OF ASSISTED RESCUE ALONG THE 2ND FLOOR BALCONY	53 HRS	16,894	6,131	2,531	0	25,555
	150.00 SF *Level Unit Cost-->*		*112.62*	*40.87*	*16.87*	*0.00*	*170.37*
	SUBTOTAL A115AB ADD TWO EXTERIOR AREAS OF ASSISTED RESCUE AL		9,565	3,409	1,466	0	14,440
	MARKUP		*1.766*	*1.798*	*1.726*	*0.000*	*1.770*
	TOTAL A115AB ADD TWO EXTERIOR AREAS OF ASSISTED RESCUE ALONG		16,894	6,131	2,531	0	25,555

CODE SUB/CREW	DESCRIPTION	QTY UM	TOTAL COSTS MATERIAL	LABOR	EQUIPMENT	UNIT COST (SUB QUOTE)	TOTAL
A115AB	**ADD TWO EXTERIOR AREAS OF ASSISTED RESCUE AL**						
A115AB11	ADD TWO EXTERIOR AREAS OF ASSISTED RESCUE ALONG THE 2ND FLO *LEVEL CONTRACTOR ID APPLIED--PRIME*						
A116	**TENANT SPACE**						
	REF COMPLETE						
A116AA	**WIDEN ALL TENANT DOORWAYS**						
A116AA11	WIDEN ALL TENANT DOORWAYS *LEVEL CONTRACTOR ID APPLIED--PRIME*						
	Doorway Modification		1700.40	582.85	155.25	0.00	2,438.50
SUB-911/911	8.5 hrs/unit 340 TOTAL HRS	40.00 EA	68,016	23,314	6,210	0	97,540
	* LINE ITEM ASSEMBLY Factor:1.0000						
	Subtotal Direct Costs		68,016	23,314	6,210	0	97,540
	Subcontractor Markups		17,112	6,396	1,386	0	24,893
	Prime Contractor Markups		35,005	12,217	3,123	0	50,345
	TOTAL A116AA11 WIDEN ALL TENANT DOORWAYS	340 HRS	120,132	41,927	10,719	0	172,778
	40.00 EA *Level Unit Cost-->*		*3,003.31*	*1,048.17*	*267.98*	*0.00*	*4,319.46*
	SUBTOTAL A116AA WIDEN ALL TENANT DOORWAYS		68,016	23,314	6,210	0	97,540
	MARKUP		*1.766*	*1.798*	*1.726*	*0.000*	*1.771*
	TOTAL A116AA WIDEN ALL TENANT DOORWAYS		120,132	41,927	10,719	0	172,778
A116AB	**MODIFY LANDING TO NECESSARY DOORS**						
A116AB11	MODIFY LANDING TO NECESSARY DOORS *LEVEL CONTRACTOR ID APPLIED--PRIME*						
	Modify Landing To Necessary Doors		9210.50	3993.81	1495.00	0.00	14,699.31
SUB-823/823	50 hrs/unit 50 TOTAL HRS	1.00 ALW	9,211	3,994	1,495	0	14,699
	* LINE ITEM ASSEMBLY Factor:1.0000						
	Subtotal Direct Costs		9,211	3,994	1,495	0	14,699
	Subcontractor Markups		2,317	1,096	334	0	3,746
	Prime Contractor Markups		4,740	2,093	752	0	7,585
	TOTAL A116AB11 MODIFY LANDING TO NECESSARY DOORS	50 HRS	16,268	7,182	2,581	0	26,031
	SUBTOTAL A116AB MODIFY LANDING TO NECESSARY DOORS		9,211	3,994	1,495	0	14,699
	MARKUP		*1.766*	*1.798*	*1.726*	*0.000*	*1.771*
	TOTAL A116AB MODIFY LANDING TO NECESSARY DOORS		16,268	7,182	2,581	0	26,031
A116AC	PROVIDE HANDRAILS FOR TENANT INTERIOR STEPS *LEVEL CONTRACTOR ID APPLIED--PRIME*						
	LEVELS IN THE SAME BRANCH BELOW THIS LEVEL CONTAIN DETAIL LINE ITEMS; ALL LINE ITEMS IN THE SAME BRANCH MUST BE AT ONLY ONE LEVEL!!						
	Provide Handrails For Tenant Interior Steps		0.00	0.00	0.00	0.00	0.00
NoSub/NoCrew		240.00 LF	0	0	0	0	0
	* LINE ITEM ASSEMBLY Factor:16.0000						
	Subtotal Direct Costs		0	0	0	0	0
	Rollup from Child Levels		11,478	5,610	932	0	18,020
	Subcontractor Markups		2,888	1,539	208	0	4,635
	Prime Contractor Markups		5,907	2,940	469	0	9,315
	TOTAL A116AC PROVIDE HANDRAILS FOR TENANT INTERIOR STEPS		20,272	10,089	1,608	0	31,970
	15.00 EA *Level Unit Cost-->*		*1,351.49*	*672.63*	*107.19*	*0.00*	*2,131.31*

THIS WBS CODE DOES NOT FOLLOW TRI-SERVICE NUMBERING SYSTEM. MODIFY CODE TO MATCH EXISTING WBS, OR USE THE A1 XX 9? or A1 XX 8? NUMBERING CONVENTION T

SUBTOTAL A116 TENANT SPACE		646,529	347,108	98,815	0	1,092,452
MARKUP		*1.766*	*1.798*	*1.726*	*0.000*	*1.773*
TOTAL A116 TENANT SPACE		1,141,923	624,222	170,565	0	1,936,710
A116AC	**PROVIDE HANDRAILS FOR TENANT INTERIOR STEPS**					
A116AC11	PROVIDE HANDRAILS FOR TENANT INTERIOR STEPS *LEVEL CONTRACTOR ID APPLIED--PRIME*					
	New Hand Rail Wall Mount	63.77	31.17	5.17	0.00	100.11
SUB-511/511	0.48 hrs/unit 86 TOTAL HRS	180.00 LF 11,478	5,610	932	0	18,020
	* LINE ITEM ASSEMBLY Factor:12.0000					
	Subtotal Direct Costs	11,478	5,610	932	0	18,020
	Subcontractor Markups	2,888	1,539	208	0	4,635
	Prime Contractor Markups	5,907	2,940	469	0	9,315
	TOTAL A116AC11 PROVIDE HANDRAILS FOR TENANT INTERIOR STE86HRS	20,272	10,089	1,608	0	31,970
	15.00 EA *Level Unit Cost-->*	*1,351.49*	*672.63*	*107.19*	*0.00*	*2,131.31*

CODE SUB/CREW	DESCRIPTION	QTY UM	TOTAL COSTS MATERIAL	LABOR	EQUIPMENT	UNIT COST (SUB QUOTE)	TOTAL
A116AC	**PROVIDE HANDRAILS FOR TENANT INTERIOR STEPS**						
A116AC11	PROVIDE HANDRAILS FOR TENANT INTERIOR STEPS *LEVEL CONTRACTOR ID APPLIED--PRIME*						
	SUBTOTAL A116AC PROVIDE HANDRAILS FOR TENANT INTERIOR STEPS		11,478	5,610	932	0	18,020
	MARKUP		*1.766*	*1.798*	*1.726*	*0.000*	*1.774*
	TOTAL A116AC PROVIDE HANDRAILS FOR TENANT INTERIOR STEPS		20,272	10,089	1,608	0	31,970
A116AD	**REPLACE DOOR & FRAME FOR DOORS LESS THAN 34"**						
A116AD11	REPLACE DOOR & FRAME FOR DOORS LESS THAN 34" W *LEVEL CONTRACTOR ID APPLIED--PRIME*						
	Replace Door & Frame For Doors Less Than 34" W		1700.40	582.85	155.25	0.00	2,438.50
	SUB-911/911 8.5 hrs/unit 255 TOTAL HRS	30.00 EA	51,012	17,486	4,658	0	73,155
	* LINE ITEM ASSEMBLY Factor:1.0000						
	Subtotal Direct Costs		51,012	17,486	4,658	0	73,155
	Subcontractor Markups		12,834	4,797	1,039	0	18,670
	Prime Contractor Markups		26,254	9,163	2,343	0	37,759
	TOTAL A116AD11 REPLACE DOOR & FRAME FOR DOORS LESS TH 34" W	255 HRS	90,099	31,445	8,039	0	129,584
	30.00 EA Level Unit Cost-->		*3,003.31*	*1,048.17*	*267.98*	*0.00*	*4,319.46*
	SUBTOTAL A116AD REPLACE DOOR & FRAME FOR DOORS LESS THAN 34"		51,012	17,486	4,658	0	73,155
	MARKUP		*1.766*	*1.798*	*1.726*	*0.000*	*1.771*
	TOTAL A116AD REPLACE DOOR & FRAME FOR DOORS LESS THAN 34" W		90,099	31,445	8,039	0	129,584
A116AE	**MODIFY & REINSTALL NECESSARY DOORS TO OPEN 9**						
A116AE11	MODIFY & REINSTALL NECESSARY DOORS TO OPEN 90 DEGREES *LEVEL CONTRACTOR ID APPLIED--PRIME*						
	Reinstall Doors		538.46	359.44	51.75	0.00	949.65
	SUB-823/823 4.5 hrs/unit 113 TOTAL HRS	25.00 EA	13,462	8,986	1,294	0	23,741
	* LINE ITEM ASSEMBLY Factor:1.0000						
	Subtotal Direct Costs		13,462	8,986	1,294	0	23,741
	Subcontractor Markups		3,387	2,465	289	0	6,141
	Prime Contractor Markups		6,928	4,709	651	0	12,288
	TOTAL A116AE11 MODIFY & REINSTALL NECESSARY DOORS TO OP 90 DEGREES	113 HRS	23,776	16,160	2,233	0	42,169
	25.00 EA Level Unit Cost-->		*951.05*	*646.40*	*89.33*	*0.00*	*1,686.78*
	SUBTOTAL A116AE MODIFY & REINSTALL NECESSARY DOORS TO OPEN 9		13,462	8,986	1,294	0	23,741
	MARKUP		*1.766*	*1.798*	*1.726*	*0.000*	*1.776*
	TOTAL A116AE MODIFY & REINSTALL NECESSARY DOORS TO OPEN 90 D		23,776	16,160	2,233	0	42,169
A116AF	**PROVIDE CODE COMPLIANT SIGNS FOR TENANT ENTR**						
A116AF11	PROVIDE CODE COMPLIANT SIGNS FOR TENANT ENTRY DOOR *LEVEL CONTRACTOR ID APPLIED--PRIME*						
	Code Compliant Signs For Restrooms		85.02	19.97	4.03	0.00	109.01
	SUB-823/823 0.25 hrs/unit 10 TOTAL HRS	40.00 EA	3,401	799	161	0	4,361
	* LINE ITEM ASSEMBLY Factor:1.0000						
	Subtotal Direct Costs		3,401	799	161	0	4,361
	Subcontractor Markups		856	219	36	0	1,111
	Prime Contractor Markups		1,750	419	81	0	2,250
	TOTAL A116AF11 PROVIDE CODE COMPLIANT SIGNS FOR TENANT ENTRY DOOR	10 HRS	6,007	1,436	278	0	7,721
	40.00 EA Level Unit Cost-->		*150.17*	*35.91*	*6.95*	*0.00*	*193.02*
	SUBTOTAL A116AF PROVIDE CODE COMPLIANT SIGNS FOR TENANT ENTR		3,401	799	161	0	4,361
	MARKUP		*1.766*	*1.798*	*1.726*	*0.000*	*1.771*
	TOTAL A116AF PROVIDE CODE COMPLIANT SIGNS FOR TENANT ENTRY D		6,007	1,436	278	0	7,721
A116AG	**LEVER DOOR HANDLES**						
A116AG11	LEVER DOOR HANDLES *LEVEL CONTRACTOR ID APPLIED--PRIME*						
	Lever Door Handles - Replace Door Hardware		191.29	11.98	4.03	0.00	207.30
	SUB-823/823 0.15 hrs/unit 11 TOTAL HRS	75.00 EA	14,347	899	302	0	15,548
	* LINE ITEM ASSEMBLY Factor:1.0000						
	Subtotal Direct Costs		14,347	899	302	0	15,548
	Subcontractor Markups		3,609	247	67	0	3,923
	Prime Contractor Markups		7,384	471	152	0	8,007
	TOTAL A116AG11 LEVER DOOR HANDLES	11 HRS	25,340	1,616	521	0	27,478
	75.00 EA Level Unit Cost-->		*337.87*	*21.55*	*6.95*	*0.00*	*366.37*

CODE SUB/CREW	DESCRIPTION	QTY UM	TOTAL COSTS MATERIAL	LABOR	EQUIPMENT	UNIT COST (SUB QUOTE)	TOTAL
A116AG LEVER DOOR HANDLES							
A116AG11 LEVER DOOR HANDLES	*LEVEL CONTRACTOR ID APPLIED--PRIME*						
	SUBTOTAL A116AG LEVER DOOR HANDLES		14,347	899	302	0	15,548
	MARKUP		*1.766*	*1.798*	*1.726*	*0.000*	*1.767*
	TOTAL A116AG LEVER DOOR HANDLES		25,340	1,616	521	0	27,478
A116AH WINDOW REPLACEMENT							
A116AH11 WINDOW REPLACEMENT + 10 OPENABLE WINDOWS	*LEVEL CONTRACTOR ID APPLIED--PRIME*						
	Replace At Least 1 Window W/ Operating Parts		495.95	283.73	74.75	0.00	854.43
SUB-823/824	3.5 hrs/unit 35 TOTAL HRS	10.00 EA	4,960	2,837	748	0	8,544
	Replace Exterior Windows With Low E Dual Glazed		68.02	20.27	9.78	0.00	98.06
SUB-824/824	0.25 hrs/unit 550 TOTAL HRS	2,200.00 SF	149,635	44,586	21,505	0	215,726
	Subtotal Direct Costs		154,595	47,423	22,253	0	224,270
	Subcontractor Markups		38,893	13,010	4,965	0	56,869
	Prime Contractor Markups		79,563	24,850	11,192	0	115,605
	TOTAL A116AH11 WINDOW REPLACEMENT + 10 OPENABLE WINDOWS	585 HRS	273,051	85,283	38,410	0	396,744
	2,200.00 SF *Level Unit Cost-->*		*124.11*	*38.77*	*17.46*	*0.00*	*180.34*
	SUBTOTAL A116AH WINDOW REPLACEMENT		154,595	47,423	22,253	0	224,270
	MARKUP		*1.766*	*1.798*	*1.726*	*0.000*	*1.769*
	TOTAL A116AH WINDOW REPLACEMENT		273,051	85,283	38,410	0	396,744
A116AI REPLACE EXTERIOR WALL FINISHES							
A116AI11 REPLACE EXTERIOR WALL FINISHES	*LEVEL CONTRACTOR ID APPLIED--PRIME*						
	Insulate Building Perimeter		1.20	1.17	0.40	0.00	2.77
SUB-911/911	0.017 hrs/unit 1070 TOTAL HRS	62,928.00 SF	75,794	73,355	25,329	0	174,477
	* LINE ITEM ASSEMBLY Factor:1.0000						
	Drywall		3.26	1.92	0.40	0.00	5.58
SUB-911/911	0.028 hrs/unit 1762 TOTAL HRS	62,928.00 SF	205,089	120,820	25,329	0	351,238
	* LINE ITEM ASSEMBLY Factor:1.0000						
	Paint		0.64	0.71	0.17	0.00	1.52
SUB-991/991	0.012 hrs/unit 755 TOTAL HRS	62,928.00 SF	40,126	44,422	10,855	0	95,403
	* LINE ITEM ASSEMBLY Factor:1.0000						
	Subtotal Direct Costs		321,008	238,598	61,512	0	621,118
	Subcontractor Markups		80,760	65,457	13,726	0	159,942
	Prime Contractor Markups		165,208	125,028	30,938	0	321,175
	TOTAL A116AI11 REPLACE EXTERIOR WALL FINISHES	3,587 HRS	566,977	429,083	106,176	0	1,102,235
	62,928.00 SF *Level Unit Cost-->*		*9.01*	*6.82*	*1.69*	*0.00*	*17.52*
	SUBTOTAL A116AI REPLACE EXTERIOR WALL FINISHES		321,008	238,598	61,512	0	621,118
	MARKUP		*1.766*	*1.798*	*1.726*	*0.000*	*1.775*
	TOTAL A116AI REPLACE EXTERIOR WALL FINISHES		566,977	429,083	106,176	0	1,102,235
A117 ABATEMENT							
REF COMPLETE							
A117AA ABATEMENT							
A117AA11 ABATEMENT - ASBESTOUS	*LEVEL CONTRACTOR ID APPLIED--PRIME*						
* LEVEL IS AN ASSEMBLY WITH UOM OF 1							
	Abatement - Asbestous		4.96	3.99	0.98	0.00	9.93
SUB-221/221	0.052 hrs/unit 803 TOTAL HRS	15,434.00 BSF	76,545	61,643	15,087	0	153,275
	* LINE ITEM ASSEMBLY Factor:1.0000						
	Subtotal Direct Costs		76,545	61,643	15,087	0	153,275
	Subcontractor Markups		19,257	16,911	3,366	0	39,535
	Prime Contractor Markups		39,394	32,302	7,588	0	79,284
	TOTAL A117AA11 ABATEMENT - ASBESTOUS	803 HRS	135,196	110,856	26,041	0	272,093
	15,434.00 BSF *Level Unit Cost-->*		*8.76*	*7.18*	*1.69*	*0.00*	*17.63*
A117AA12 ABATEMENT - LEAD PAINT	*LEVEL CONTRACTOR ID APPLIED--PRIME*						
* LEVEL IS AN ASSEMBLY WITH UOM OF 1							
	Abatement - Lead Paint		4.04	2.46	0.98	0.00	7.47
SUB-221/221	0.032 hrs/unit 494 TOTAL HRS	15,434.00 BSF	62,329	37,934	15,087	0	115,350
	* LINE ITEM ASSEMBLY Factor:1.0000						

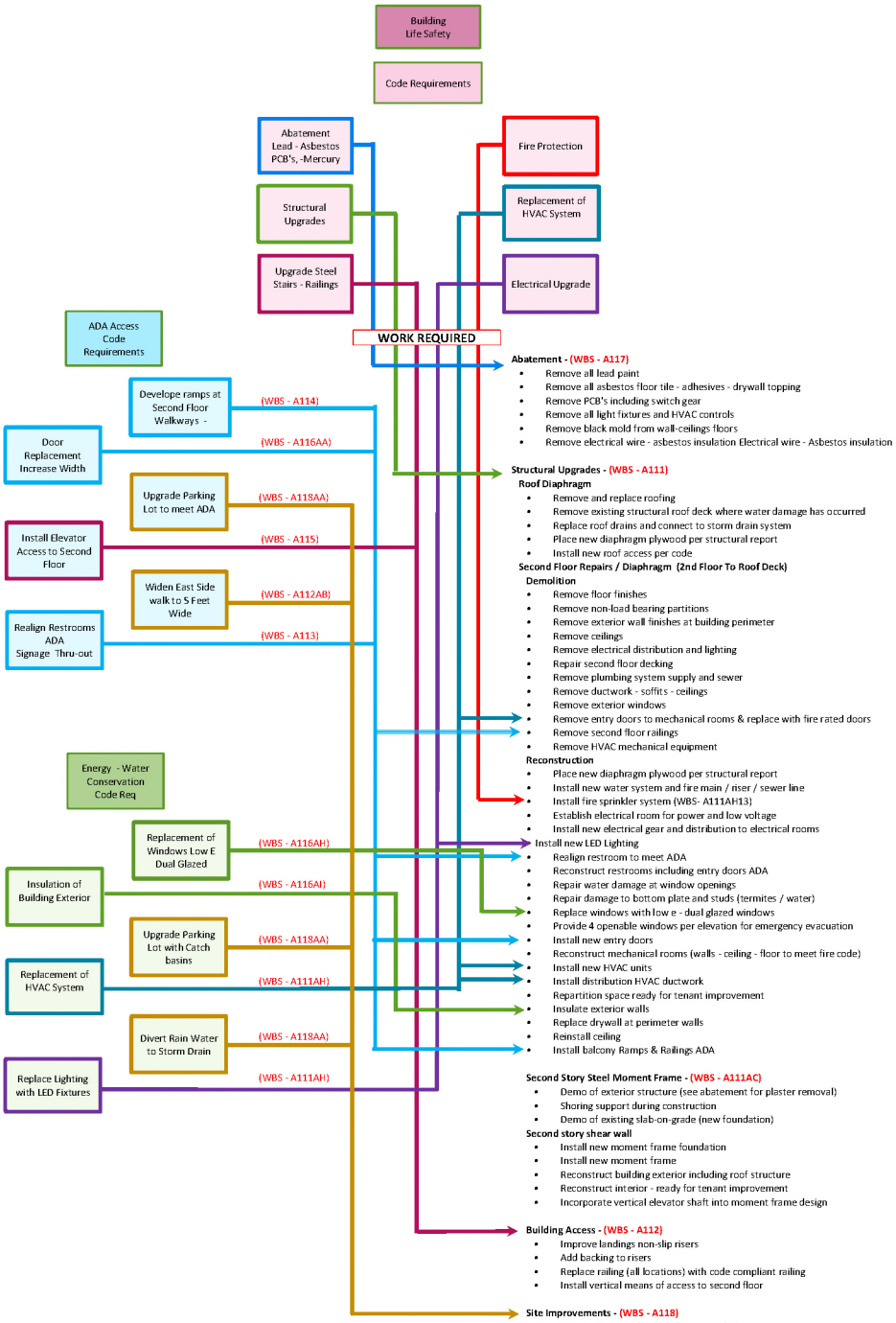
CODE / SUB/CREW	DESCRIPTION	QTY UM	TOTAL COSTS MATERIAL	LABOR	EQUIPMENT	UNIT COST (SUB QUOTE)	TOTAL
A117AA ABATEMENT							
A117AA12 ABATEMENT - LEAD PAINT	*LEVEL CONTRACTOR ID APPLIED--PRIME*						
* LEVEL IS AN ASSEMBLY WITH UOM OF 1							
	Subtotal Direct Costs		62,329	37,934	15,087	0	115,350
	Subcontractor Markups		15,681	10,407	3,366	0	29,454
	Prime Contractor Markups		32,078	19,878	7,588	0	59,544
TOTAL A117AA12 ABATEMENT - LEAD PAINT		494 HRS	110,089	68,219	26,041	0	204,349
15,434.00 BSF	*Level Unit Cost-->*		*7.13*	*4.42*	*1.69*	*0.00*	*13.24*
A117AA13 ABATEMENT - ELECTRICAL WIRE	*LEVEL CONTRACTOR ID APPLIED--PRIME*						
* LEVEL IS AN ASSEMBLY WITH UOM OF 1							
	Abatement - Electrical Wire		3.05	1.69	0.98	0.00	5.71
SUB-221/221	0.022 hrs/unit 340 TOTAL HRS	15,434.00 BSF	47,020	26,080	15,087	0	88,187
* LINE ITEM ASSEMBLY	Factor:1.0000						
	Subtotal Direct Costs		47,020	26,080	15,087	0	88,187
	Subcontractor Markups		11,830	7,155	3,366	0	22,351
	Prime Contractor Markups		24,199	13,666	7,588	0	45,453
TOTAL A117AA13 ABATEMENT - ELECTRICAL WIRE		340 HRS	83,049	46,900	26,041	0	155,991
15,434.00 BSF	*Level Unit Cost-->*		*5.38*	*3.04*	*1.69*	*0.00*	*10.11*
A117AA14 ABATEMENT - BLACK MOLD	*LEVEL CONTRACTOR ID APPLIED--PRIME*						
* LEVEL IS AN ASSEMBLY WITH UOM OF 1							
	Remove Interior Wall Finishes		0.00	3.46	1.55	0.00	5.01
SUB-221/221	0.045 hrs/unit 2832 TOTAL HRS	62,928.00 SF	0	217,499	97,696	0	315,195
	Subtotal Direct Costs		0	217,499	97,696	0	315,195
	Subcontractor Markups		0	59,668	21,800	0	81,468
	Prime Contractor Markups		0	113,972	49,137	0	163,109
TOTAL A117AA14 ABATEMENT - BLACK MOLD		2,832 HRS	0	391,140	168,632	0	559,772
15,434.00 BSF	*Level Unit Cost-->*		*0.00*	*25.34*	*10.93*	*0.00*	*36.27*
A117AA15 DUMP FEES	*LEVEL CONTRACTOR ID APPLIED--PRIME*						
	Debris Removal		1912.95	0.00	0.00	0.00	1,912.95
SUB-111/NoCrew		15.00 LDS	28,694	0	0	0	28,694
	Subtotal Direct Costs		28,694	0	0	0	28,694
	Subcontractor Markups		7,219	0	0	0	7,219
	Prime Contractor Markups		14,768	0	0	0	14,768
TOTAL A117AA15 DUMP FEES			50,681	0	0	0	50,681
30.00 LDS	*Level Unit Cost-->*		*1,689.36*	*0.00*	*0.00*	*0.00*	*1,689.36*
A117AA16 REMOVE PCB CONTAINING EQUIPMENT	*LEVEL CONTRACTOR ID APPLIED--PRIME*						
	Replace Switch Gear "Main"		63765.00	16408.84	1380.00	0.00	81,553.84
SUB-161/161	200 hrs/unit 200 TOTAL HRS	1.00 EA	63,765	16,409	1,380	0	81,554
	Replace Subpanels		17712.50	3938.12	977.50	0.00	22,628.12
SUB-161/161	48 hrs/unit 192 TOTAL HRS	4.00 EA	70,850	15,752	3,910	0	90,512
	Subtotal Direct Costs		134,615	32,161	5,290	0	172,066
	Subcontractor Markups		33,867	8,823	1,180	0	43,870
	Prime Contractor Markups		69,280	16,853	2,661	0	88,794
TOTAL A117AA16 REMOVE PCB CONTAINING EQUIPMENT		392 HRS	237,762	57,837	9,131	0	304,730
5.00 EA	*Level Unit Cost-->*		*47,552.40*	*11,567.47*	*1,826.21*	*0.00*	*60,946.08*
SUBTOTAL A117AA ABATEMENT			349,204	375,317	148,246	0	872,767
MARKUP			*1.766*	*1.798*	*1.726*	*0.000*	*1.773*
TOTAL A117AA ABATEMENT			616,777	674,952	255,887	0	1,547,616
A118 SITE IMPROVEMENTS							
REF COMPLETE							
A118AA SITE IMPROVEMENTS							
A118AA11 DIVERT RAIN WATER TO STORM DRAIN	*LEVEL CONTRACTOR ID APPLIED--PRIME*						
	Divert Rain Water To Storm Drain		120.44	65.29	40.25	0.00	225.98
SUB-221/221	0.85 hrs/unit 298 TOTAL HRS	350.00 LF	42,156	22,850	14,088	0	79,093
	Storm Drain Tie-In		4534.40	6144.57	2875.00	0.00	13,553.97
SUB-221/221	80 hrs/unit 80 TOTAL HRS	1.00 EA	4,534	6,145	2,875	0	13,554

CODE	SUB/CREW	DESCRIPTION	QTY	UM	TOTAL COSTS MATERIAL	LABOR	EQUIPMENT	UNIT COST (SUB QUOTE)	TOTAL
		Subtotal Direct Costs			46,690	28,995	16,963	0	92,647
		Subcontractor Markups			11,746	7,954	3,785	0	23,486
		Prime Contractor Markups			24,029	15,194	8,531	0	47,754
		TOTAL A118AA11 DIVERT RAIN WATER TO STORM DRAIN	378	HRS	82,466	52,143	29,279	0	163,887
		350.00 LF	*Level Unit Cost-->*		*235.62*	*148.98*	*83.65*	*0.00*	*468.25*
		A118AA12 UPGRADE PARKING LOT DRAINAGE *LEVEL CONTRACTOR ID APPLIED--PRIME*							
		Install Catch Basins			19129.50	6144.57	2875.00	0.00	28,149.07
	SUB-221/221	80 hrs/unit 240 TOTAL HRS	3.00	EA	57,389	18,434	8,625	0	84,447
		Subtotal Direct Costs			57,389	18,434	8,625	0	84,447
		Subcontractor Markups			14,438	5,057	1,925	0	21,420
		Prime Contractor Markups			29,535	9,659	4,338	0	43,533
		TOTAL A118AA12 UPGRADE PARKING LOT DRAINAGE	240	HRS	101,362	33,150	14,888	0	149,400
		3.00 EA	*Level Unit Cost-->*		*33,787.23*	*11,050.08*	*4,962.52*	*0.00*	*49,799.84*
		A118AA13 WIDEN EAST SIDE WALKWAYY TO 5 FEET *LEVEL CONTRACTOR ID APPLIED--PRIME*							
		Widen Side Walk			12.05	6.53	2.70	0.00	21.28
	SUB-221/221	0.085 hrs/unit 128 TOTAL HRS	1,500.00	SF	18,067	9,793	4,054	0	31,913
		Install New Curb			13.46	5.53	2.13	0.00	21.12
	SUB-221/221	0.072 hrs/unit 22 TOTAL HRS	300.00	LF	4,038	1,659	638	0	6,336
		Subtotal Direct Costs			22,105	11,452	4,692	0	38,249
		Subcontractor Markups			5,561	3,142	1,047	0	9,750
		Prime Contractor Markups			11,377	6,001	2,360	0	19,737
		TOTAL A118AA13 WIDEN EAST SIDE WALKWAYY TO 5 FEET	149	HRS	39,043	20,595	8,099	0	67,736
		1,500.00 SF	*Level Unit Cost-->*		*26.03*	*13.73*	*5.40*	*0.00*	*45.16*
		A118AA14 UPGRADE PARKING LOT TO MEET ADA *LEVEL CONTRACTOR ID APPLIED--PRIME*							
		Parking Lot Ada Signage			177.13	115.21	40.25	0.00	332.59
	SUB-221/221	1.5 hrs/unit 6 TOTAL HRS	4.00	EA	709	461	161	0	1,330
		Subtotal Direct Costs			709	461	161	0	1,330
		Subcontractor Markups			178	126	36	0	341
		Prime Contractor Markups			365	241	81	0	687
		TOTAL A118AA14 UPGRADE PARKING LOT TO MEET ADA	6	HRS	1,251	829	278	0	2,358
		4.00 EA	*Level Unit Cost-->*		*312.84*	*207.19*	*69.48*	*0.00*	*589.51*
		A118AA15 REPAIR & RESURFACE EAST ROADWAY *LEVEL CONTRACTOR ID APPLIED--PRIME*							
		Repair & replace East roadway			8.79	2.92	1.67	0.00	13.37
	SUB-221/221	0.038 hrs/unit 92 TOTAL HRS	2,430.00	SF	21,349	7,092	4,052	0	32,493
		* LINE ITEM ASSEMBLY Factor:1.0000							
		Subtotal Direct Costs			21,349	7,092	4,052	0	32,493
		Subcontractor Markups			5,371	1,946	904	0	8,221
		Prime Contractor Markups			10,987	3,716	2,038	0	16,742
		TOTAL A118AA15 REPAIR & RESURFACE EAST ROADWAY	92	HRS	37,707	12,755	6,994	0	57,455
		2,430.00 SF	*Level Unit Cost-->*		*15.52*	*5.25*	*2.88*	*0.00*	*23.64*
		A118AA16 SEWER LINE REPLACEMENT *LEVEL CONTRACTOR ID APPLIED--PRIME*							
		Sewer Line Replacement			49.59	25.72	21.27	0.00	96.59
	SUB-151/151	0.35 hrs/unit 88 TOTAL HRS	250.00	LF	12,399	6,430	5,319	0	24,147
		* LINE ITEM ASSEMBLY Factor:1.0000							
		Demo & Replace Building Slab			8.93	7.07	7.82	0.00	23.81
	SUB-221/221	0.092 hrs/unit 92 TOTAL HRS	1,000.00	SF	8,927	7,066	7,820	0	23,813
		* LINE ITEM ASSEMBLY Factor:4.0000							
		Subtotal Direct Costs			21,326	13,496	13,139	0	47,961
		Subcontractor Markups			5,365	3,703	2,932	0	12,000
		Prime Contractor Markups			10,975	7,072	6,608	0	24,656
		TOTAL A118AA16 SEWER LINE REPLACEMENT	180	HRS	37,667	24,271	22,679	0	84,616
		250.00 LF	*Level Unit Cost-->*		*150.67*	*97.08*	*90.71*	*0.00*	*338.46*
		SUBTOTAL A118AA SITE IMPROVEMENTS			169,567	79,930	47,631	0	297,128
		MARKUP			*1.766*	*1.798*	*1.726*	*0.000*	*1.768*
		TOTAL A118AA SITE IMPROVEMENTS			299,495	143,742	82,216	0	525,453

CODE SUB/CREW	DESCRIPTION	QTY UM	TOTAL COSTS MATERIAL	LABOR	EQUIPMENT	UNIT COST (SUB QUOTE)	TOTAL
BARRY BUILDING OWNER'S COSTSB1 OWNER'S COSTS							
B1 OWNER'S COSTS							
B111 OWNER'S COSTS							
B111AA OWNER'S COST							
B111AA11 DESIGN							
* LEVEL IS AN ASSEMBLY WITH UOM OF 1							
	Design		0.00	0.00	0.00	0.07	0.07
	SUB-998/NoCrew	***,***.** TC$	0	0	0	710,686	710,686
	* LINE ITEM ASSEMBLY Factor:1.0000						
	Subtotal Direct Costs		0	0	0	710,686	710,686
TOTAL B111AA11 DESIGN			0	0	0	1,002,922	1,002,922
10,152,655.00 TC$	*Level Unit Cost-->*		*0.00*	*0.00*	*0.00*	*0.10*	*0.10*
B111AA12 PERMITS							
* LEVEL IS AN ASSEMBLY WITH UOM OF 1							
	Permits		0.00	0.00	0.00	0.01	0.01
	SUB-998/NoCrew	***,***.** TC$	0	0	0	152,290	152,290
	* LINE ITEM ASSEMBLY Factor:1.0000						
	Subtotal Direct Costs		0	0	0	152,290	152,290
TOTAL B111AA12 PERMITS			0	0	0	214,912	214,912
10,152,655.00 TC$	*Level Unit Cost-->*		*0.00*	*0.00*	*0.00*	*0.02*	*0.02*
B111AA13 CONSTRUCTION MANAGEMENT							
* LEVEL IS AN ASSEMBLY WITH UOM OF 1							
	Pm / Cm		0.00	0.00	0.00	0.03	0.03
	SUB-998/NoCrew	***,***.** TC$	0	0	0	304,580	304,580
	* LINE ITEM ASSEMBLY Factor:1.0000						
	Subtotal Direct Costs		0	0	0	304,580	304,580
TOTAL B111AA13 CONSTRUCTION MANAGEMENT			0	0	0	429,824	429,824
10,152,655.00 TC$	*Level Unit Cost-->*		*0.00*	*0.00*	*0.00*	*0.04*	*0.04*
B111AA14 CONTINGENCY @ 15%							
	Contingency		0.00	0.00	0.00	0.15	0.15
	NoSub/NoCrew	***,***.** TC$	0	0	0	1,017,663	1,017,663
	* LINE ITEM ASSEMBLY Factor:1.0000						
	Subtotal Direct Costs		0	0	0	1,017,663	1,017,663
TOTAL B111AA14 CONTINGENCY @ 15%			0	0	0	1,017,663	1,017,663
6,784,419.00 TC$	*Level Unit Cost-->*		*0.00*	*0.00*	*0.00*	*0.15*	*0.15*
SUBTOTAL B111AA OWNER'S COST			0	0	0	2,185,218	2,185,218
MARKUP			*0.000*	*0.000*	*0.000*	*1.220*	*1.220*
TOTAL B111AA OWNER'S COST			0	0	0	2,665,320	2,665,320

98.2% OF PROJECT PERFORMED BY SUBCONTRACTORS

109 DETAIL LINE ITEMS


Building Life Safety
Code Requirements
Abatement Lead - Asbestos PCB's, -Mercury
Structural Upgrades
Upgrade Steel Stairs - Railings
Fire Protection
Replacement of HVAC System
Electrical Upgrade
ADA Access Code Requirements
WORK REQUIRED
Develope ramps at Second Floor Walkways -
(WBS - A114)
Door Replacement Increase Width
(WBS - A116AA)
Upgrade Parking Lot to meet ADA
(WBS - A118AA)
Install Elevator Access to Second Floor
(WBS - A115)
Widen East Side walk to 5 Feet Wide
(WBS - A112AB)
Realign Restrooms ADA Signage Thru-out
(WBS - A113)
Energy - Water Conservation Code Req
Replacement of Windows Low E Dual Glazed
(WBS - A116AH)
Insulation of Building Exterior
(WBS - A116AI)
Upgrade Parking Lot with Catch basins
(WBS - A118AA)
Replacement of HVAC System
(WBS - A111AH)
Divert Rain Water to Storm Drain
(WBS - A118AA)
Replace Lighting with LED Fixtures
(WBS - A111AH)
Abatement - (WBS - A117)
Remove all lead paint
Remove all asbestos floor tile - adhesives - drywall topping
Remove PCB's including switch gear
Remove all light fixtures and HVAC controls
Remove black mold from wall-ceilings floors
Remove electrical wire - asbestos insulation Electrical wire - Asbestos insulation
Structural Upgrades - (WBS - A111)
Roof Diaphragm
Remove and replace roofing
Remove existing structural roof deck where water damage has occurred
Replace roof drains and connect to storm drain system
Place new diaphragm plywood per structural report
Install new roof access per code
Second Floor Repairs / Diaphragm (2nd Floor To Roof Deck)
Demolition
Remove floor finishes
Remove non-load bearing partitions
Remove exterior wall finishes at building perimeter
Remove ceilings
Remove electrical distribution and lighting
Repair second floor decking
Remove plumbing system supply and sewer
Remove ductwork - soffits - ceilings
Remove exterior windows
Remove entry doors to mechanical rooms & replace with fire rated doors
Remove second floor railings
Remove HVAC mechanical equipment
Reconstruction
Place new diaphragm plywood per structural report
Install new water system and fire main / riser / sewer line
Install fire sprinkler system (WBS- A111AH13)
Establish electrical room for power and low voltage
Install new electrical gear and distribution to electrical rooms
Install new LED Lighting
Realign restroom to meet ADA
Reconstruct restrooms including entry doors ADA
Repair water damage at window openings
Repair damage to bottom plate and studs (termites / water)
Replace windows with low e - dual glazed windows
Provide 4 openable windows per elevation for emergency evacuation
Install new entry doors
Reconstruct mechanical rooms (walls - ceiling - floor to meet fire code)
Install new HVAC units
Install distribution HVAC ductwork
Repartition space ready for tenant improvement
Insulate exterior walls
Replace drywall at perimeter walls
Reinstall ceiling
Install balcony Ramps & Railings ADA
Second Story Steel Moment Frame - (WBS - A111AC)
Demo of exterior structure (see abatement for plaster removal)
Shoring support during construction
Demo of existing slab-on-grade (new foundation)
Second story shear wall
Install new moment frame foundation
Install new moment frame
Reconstruct building exterior including roof structure
Reconstruct interior - ready for tenant improvement
Incorporate vertical elevator shaft into moment frame design
Building Access - (WBS - A112)
Improve landings non-slip risers
Add backing to risers
Replace railing (all locations) with code compliant railing
Install vertical means of access to second floor
Site Improvements - (WBS - A118)
Divert rain water from roof to storm drain
Upgrade parking lot with catch basins piping to storm drain
Widen east side sidewalk to 5 feet in width - new walk and curb
Upgrade parking lot to meet ADA
Resurface parking lot for safety purposes
Install new sewer line
First Floor Repairs (Slab on Grade to 2nd Floor deck)
Demolition
Remove floor finishes
Remove non-load bearing partitions
Remove exterior wall finishes at building perimeter
Remove ceilings
Remove electrical distribution and lighting
Remove plumbing system supply and sewer
Remove ductwork - soffits - ceilings
Remove exterior windows
Remove entry doors
Replace 2x wood plates damaged by water or insects (WBS - A111AI)
Reconstruction (Slab on grade to second floor structure)
Install new sewer line
Install new water system and fire main / riser / sewer line
Install fire sprinkler system
Establish electrical room for power and low voltage
Install new electrical gear and distribution to electrical rooms
Install new led lighting
Realign restroom to meet ADA
Reconstruct restrooms including entry doors ADA
Repair water damage at window openings
Repair damage to bottom plate and studs(termites / water)
Replace windows with low e - dual glazed windows
Provide 4 openable windows per elevation for emergency evacuation
Install new entry doors
Reconstruct mechanical rooms (walls - ceiling - floor to meet fire code)
Install new HVAC units
Install distribution HVAC ductwork
Repartition space ready for tenant improvement
Insulate exterior walls
Replace drywall at perimeter walls
Reinstall ceiling
Add FDC "fire department connection"
Strengthen Existing 2 Story Shear Wall - (WBS - A111AD)
Demo of exterior structure (see abatement for plaster removal)
Shoring support during construction
Demo of existing slab-on-grade (new foundation)
Shear wall on interior of existing wall
Install new shear wall foundation
Install new moment frame
Reconstruct building exterior including roof structure
Reconstruct interior - ready for tenant improvement
Incorporate shear wall into diaphragm framing

ATTACHMENT G

THE BARRY BUILDING - LAND RESIDUAL ANALYSIS (REMODEL)

11973 San Vicente Blvd. Los Angeles

PROJECTED LEASE SUMMARY

March 2023

SPACE	SQUARE FEET*	PROJ. RENT PSF/MO	ANNUAL RENT	NNN / Gross ǂ	RENT INCREASE
Shops 1-6 Combined	1,817	$8.50	$185,334	nnn	3% annual
Store #1	1,203	$8.50	$122,742	nnn	3% annual
Rear of Ground Floor	2,129	$4.50	$114,966	nnn	3% annual
2nd Floor Office	6,331	$3.50	$265,918	nnn	3% annual
Common Area	1,319	-	-	-	-
Parking (20 office spaces)	-	-	$48,000	Gross	3% annual
TOTALS	**12,800**	**4.80**	**$736,960**		

*Barry Building measurements per attached Gruen space plan.

ǂNNN: Tenant reimburses Landlord for Property Taxes, Maintenance & Insurance; Gross: Tenant does not reimburse.

THE BARRY BUILDING - LAND RESIDUAL ANALYSIS (REMODEL)

11973 San Vicente Blvd. Los Angeles

INVESTMENT ANALYSIS

PROJECTED GROSS RENTAL INCOME			**$736,960**
EXPENSE REIMBURSEMENT		**1.44 psf/mo**	$221,547
GROSS OPERATING INCOME			**$958,507**
VACANCY		**5%**	-$36,848
EFFECTIVE RENTAL INCOME			**$921,659**
OPERATING EXPENSES		**1.44 psf/mo**	-$221,547
RESERVES		**2%**	-$18,433
NET OPERATING INCOME			**$681,678**
FINANCING		60.0% LTV	$6,816,785
DOWNPAYMENT		40.0%	$4,544,523
AMORTIZATION		30 years	
INTEREST RATE		6.50%	
ANNUAL DEBT SERVICE		517,041	-$517,041
ANNUAL CASH FLOW			**$164,638**
INDICATED VALUE AT COMPLETION			**$11,361,308**
CAPITALIZATION RATE			**$0**
CASH ON CASH RETURN			**$0**
VALUE PER S.F. OF BLDG.	**12,800 SF**		**$888**
PROJECTED REMODEL COSTS*			
CONSTRUCTION COSTS PER BID		$1,001 /SF	-$12,818,000
LEASING COMMISSIONS		$15 /SF	-$191,996
TIA‡ GROUND FLOOR RETAIL		$50 /SF	-$257,468
TIA‡ 2ND FLOOR		$100 /SF	-$633,138
DEVELOPER PROFIT ¥		18%	-$2,045,035
CITY TRANSFER TAX		5.5%	-$624,872
COST OF SALE		4%	-$454,452
TOTAL COSTS			**-$17,024,961**
LAND RESIDUAL			**-$5,663,653**
LAND RESIDUAL/SF LAND			**-$103**

*Does not include carry costs during construction (property taxes, insurance, construction financing, etc.).

‡Tenant Improvement Allowance.

¥Calculating residual land value requires consideration of gross development value, and that gross development value is the total development cost, inclusive of the developer's profit.

THE BARRY BUILDING - LAND RESIDUAL ANALYSIS (REMODEL)

11973 San Vicente Blvd. Los Angeles

Estimated Expenses

Item	Annual Expense
Property Taxes (adjusted for sale)	$138,000
Insurance	$15,360
CAM	$46,079
Management (3% of Gross Rent)	$22,109
Total Expenses	**$221,547**

Reimbursement

Item	Annual Reimbursement
Property Taxes	$138,000
Insurance	$15,360
CAM	$46,079
Management (3% of Gross Rent)	$22,109
Total Reimbursement	**$221,547**

THE BARRY BUILDING - LAND RESIDUAL ANALYSIS (REMODEL)

11973 San Vicente Blvd. Los Angeles

ASSUMPTIONS

Land Size	**54,809 /SF**	
Construction Costs*:	**$12,818,000**	
Inflation Rate:	**3.0%**	
Property Tax Rate	**1.20%**	
Proposed new financing:		
LTV	**60%**	
Amortization	**30**	**Years**
Interest Rate	**6.50%**	
Call	**10**	**Years**

Taxes adjusted for sale.

***per Hill International cost estimate**

The information above has been obtained from sources believed reliable. While we do not doubt its accuracy, we have not verified it and make no guarantee, warranty or representation about it. It is your responsibility to independently confirm its accuracy and completeness. Any projections, opinions, assumptions or estimates used are for example only and do not represent the current or future performance of the property. The value of this transaction to you depends on tax and other factors which should be evaluated by your tax, financial and legal advisors. You and your advisors should conduct a careful, independent investigation of the property to determine to your satisfaction the suitability of the property for your needs.

Prepared By:
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THE BARRY BUILDING - LAND RESIDUAL ANALYSIS (REMODEL + ANNEX)

11973 San Vicente Blvd. Los Angeles

PROJECTED LEASE SUMMARY

March 2023

SPACE	SQUARE FEET*	PROJ. RENT PSF/MO	ANNUAL RENT	NNN / Gross ǂ	RENT INCREASE
Existing Building Remodel (Partial Demolition)					
Shops 1-6 Combined	1,817	$8.50	$185,334	nnn	3% annual
Store #1	1,203	$8.50	$122,742	nnn	3% annual
2nd Floor Office	4,257	$3.50	$178,794	nnn	3% annual
Common Area	1,679	-	-	-	-
Monthly Parking (13 office spaces)	-	-	$31,200	Gross	3% annual
Subtotal	**8,956**	-	-	-	-
Proposed 3-Story Annex					
Ground Floor Office	3,605	$3.50	$151,410	nnn	3% annual
2nd Floor Office	3,605	$3.50	$151,410	nnn	3% annual
3rd Floor Office	3,605	$3.50	$151,410	nnn	3% annual
Parking (32 office spaces)	-	-	$76,800	Gross	3% annual
Subtotal	**10,815**	-	-	-	-
TOTALS	**19,771**	**$4.42**	**$1,049,100**		

*Barry Building measurements per attached Gruen space plan, adjusted for partial demolition.

ǂNNN: Tenant reimburses Landlord for Property Taxes, Maintenance & Insurance; Gross: Tenant does not reimburse.

THE BARRY BUILDING - LAND RESIDUAL ANALYSIS (REMODEL + ANNEX)

11973 San Vicente Blvd. Los Angeles

INVESTMENT ANALYSIS

PROJECTED GROSS RENTAL INCOME			**$1,049,100**
EXPENSE REIMBURSEMENT		**1.34 psf/mo**	$318,375
GROSS OPERATING INCOME			**$1,367,475**
VACANCY		**5%**	-$68,374
EFFECTIVE RENTAL INCOME			**$1,299,101**
OPERATING EXPENSES		**1.34 psf/mo**	-$318,375
RESERVES		**2%**	-$25,982
NET OPERATING INCOME			**$954,744**
FINANCING		60.0% LTV	$9,547,439
DOWNPAYMENT		40.0%	$6,364,959
AMORTIZATION		30 years	
INTEREST RATE		6.50%	
ANNUAL DEBT SERVICE		724,156	-$724,156
ANNUAL CASH FLOW			**$230,588**
INDICATED VALUE AT COMPLETION			**$15,912,399**
CAPITALIZATION RATE			**6.00%**
CASH ON CASH RETURN			**3.6%**
VALUE PER S.F. OF BLDG. -	**19,771 SF**		**$805**
PROJECTED PROJECT COSTS*			
CONSTRUCTION COSTS PER BID - BARRY BUILDING		$1,001 /SF	-$8,968,594
CONSTRUCTION COSTS - ANNEX		$400 /SF	-$4,326,000
DEMOLITION COSTS (+/- 4,203 SF)		$5 /SF	-$21,015
LEASING COMMISSIONS		$15 /SF	-$296,570
TIA‡ - BARRY BUILDING GROUND FLOOR RETAIL		$50 /SF	-$151,018
TIA‡ - BARRY BUILDING 2ND FLOOR		$100 /SF	-$425,700
TIA‡ - ANNEX		$100 /SF	-$1,081,500
DEVELOPER PROFIT ¥		18%	-$2,864,232
CITY TRANSFER TAX		5.5%	-$875,182
COST OF SALE		4%	-$636,496
TOTAL COSTS			**-$19,646,307**
LAND RESIDUAL			**-$3,733,908**
LAND RESIDUAL/SF LAND			**-$68**

*Does not include carry costs during construction (property taxes, insurance, construction financing, etc.).

‡Tenant Improvement Allowance.

¥Calculating residual land value requires consideration of gross development value, and that gross development value is the total development cost, inclusive of the developer's profit.

THE BARRY BUILDING - LAND RESIDUAL ANALYSIS (REMODEL + ANNEX)

11973 San Vicente Blvd. Los Angeles

Estimated Expenses

Item	Annual Expense
Property Taxes (adjusted for sale)	$192,000
Insurance	$23,726
Common Area Maintenance	$71,177
Management (3% of Gross Rent)	$31,473
Total Expenses	**$318,375**

Estimated Reimbursement

Item	Annual Reimbursement
Property Taxes	$192,000
Insurance	$23,726
Common Area Maintenance	$71,177
Management (3% of Gross Rent)	$31,473
Total Reimbursement	**$318,375**

THE BARRY BUILDING - LAND RESIDUAL ANALYSIS (REMODEL + ANNEX)

11973 San Vicente Blvd. Los Angeles

ASSUMPTIONS

Land Size	**54,809 /SF**	
Barry Building Construction Costs*:	**$8,968,594**	
Annex Estimated Construction Costs:	**$400 /SF**	
Estimated Demolition Costs:	**$5 /SF**	
Inflation Rate:	**3.0%**	
Property Tax Rate	**1.20%**	
Proposed New Financing:		
Loan to Value Ratio	**60%**	
Amortization	**30**	**Years**
Interest Rate	**6.50%**	
Call	**10**	**Years**

Taxes adjusted for sale

***per Hill International cost estimate, adjusted pro-rate for demolition of the rear portion.**

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COMPS_BRENTWOOD 18 MONTHS_TBOWER

Prepared on 11/23/2022 | **42** Records

CBRE

Saltair San Vicente

12011 San Vicente Blvd, Los Angeles, CA 90049

Location Los Angeles - West Los Angeles - Brentwood
Property Size 55,730 SF
Built | Reno 1964 | -
Building Info Office | General Office | Class B
Tenancy Type Multi Occupancy

1



NEW LEASE

Deal Size 1,952 SF
Sign Date 10/14/2022
Lease Term 12 Months
01/01/2023 - 12/31/2023

Notes Short-term lease.

Base Rent $4.25 FSG / Mo
Effective Rent -
Asking Rent -
Escalations 3.0
Free Rent Months 2 mo
TIA $35.00

Space Usage General Office
Parking Ratio 3 / 1,000

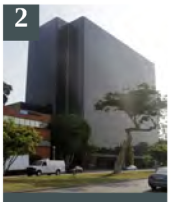
Tenant Upland Workshop, LLC
Tenant Rep CBRE | Jeffrey Gerlach, Stanley Gerlach Jr
Lessor DE SALTAIR SV, LLC c/o Douglas Emmett Management
Lessor Rep Douglas Emmett, Inc. | Clayton Hjulberg

11611 San Vicente Blvd - Brentwood Gateway

11611 San Vicente Blvd, Los Angeles, CA 90049

Location Los Angeles - West Los Angeles - Brentwood
Property Size 104,716 SF
Built | Reno 1977 | 2020
Building Info Office | General Office | Class A
Tenancy Type Multi Occupancy

2



NEW LEASE

Deal Size 5,724 SF
Sign Date 10/05/2022
Lease Term 64 Months
04/01/2023 - 07/31/2028

Notes -

Base Rent $6.25 FSG / Mo
Effective Rent -
Asking Rent -
Escalations 3.0
Free Rent Months 4 mo
TIA $45.15

Space Usage General Office
Parking Ratio 2.71 / 1,000

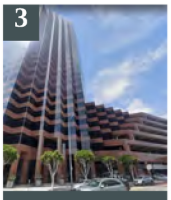
Tenant Lone View Capital Management, LLC
Tenant Rep CBRE | Drew Pion
Lessor SARAGOSSA LLC
Lessor Rep CBRE | Lauren Morris, Blake Mirkin

11777 Wilshire Blvd

11777 WILSHIRE Blvd, LOS ANGELES, CA 90025

Location Los Angeles - West Los Angeles - Brentwood
Property Size 99,111 SF
Built | Reno 1974 | -
Building Info Office | General Office | -
Tenancy Type -

3



RENEWAL

Deal Size 18,890 SF
Sign Date 09/28/2022
Lease Term 96 Months
05/01/2023 - 04/30/2031

Notes -

Base Rent $4.75 FSG / Mo
Effective Rent -
Asking Rent -
Escalations 0.0
Free Rent Months 0 mo
TIA $0.00

Space Usage General Office
Parking Ratio 1.01 / 1,000

Tenant SEMLER BROSSY CONSULTING GROUP, LLC a California limited liability company
Tenant Rep NONE LISTED | -
Lessor CSHV Wilshire Landmark, Llc
Lessor Rep CBRE | Raquel Binswanger, Bryan Dunne

COMPS_BRENTWOOD 18 MONTHS_TBOWER

Prepared on 11/23/2022 | **42** Records

CBRE

12100 Wilshire Blvd
12100 Wilshire Blvd, Los Angeles, CA 90025

Location Los Angeles - West Los Angeles - Brentwood
Property Size 365,325 SF
Built | Reno 1985 | -
Building Info Office | General Office | Class A
Tenancy Type Multi Occupancy

4



RENEWAL

Deal Size 9,754 SF
Sign Date 09/27/2022
Lease Term 12 Months
07/01/2023 - 06/30/2024

Notes Short-term renewal.

Base Rent $3.90 FSG / Mo
Effective Rent -
Asking Rent -
Escalations 0.0
Free Rent Months 0 mo
TIA $0.00

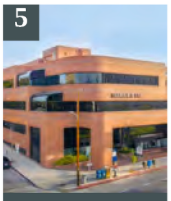
Space Usage General Office
Parking Ratio 3 / 1,000

Tenant Walker & Dunlop, LLC
Tenant Rep CBRE | Jordan Brainard, Bradley Wilner, Daniel Falls, Louis Christopher, Charles Carroccio
Lessor DE Pacific 12100, LLC
Lessor Rep Douglas Emmett, Inc. | Craig Newlands

Brentwood Saltair
11999 San Vicente Blvd, Los Angeles, CA 90049

Location Los Angeles - West Los Angeles - Brentwood
Property Size 60,502 SF
Built | Reno 1986 | -
Building Info Office | General Office | Class A
Tenancy Type Multi Occupancy

5



RENEWAL

Deal Size 10,845 SF
Sign Date 08/03/2022
Lease Term 72 Months
10/01/2023 - 09/30/2029

Notes -

Base Rent $3.68 FSG / Mo
Effective Rent -
Asking Rent -
Escalations 3.5
Free Rent Months 2 mo
TIA $25.00

Space Usage General Office
Parking Ratio 3 / 1,000

Tenant Sitrick And Company, Inc.
Tenant Rep CBRE | Carter Haslam, Mikkel Pearce, Katelyn Hollywood, Jeffrey Gerlach, Stanley Gerlach Jr, Scott Kenny
Lessor Douglas Emmett Management
Lessor Rep Douglas Emmett, Inc. | Clayton Hjulberg

12100 Wilshire Blvd
12100 Wilshire Blvd, Los Angeles, CA 90025

Location Los Angeles - West Los Angeles - Brentwood
Property Size 365,325 SF
Built | Reno 1985 | -
Building Info Office | General Office | Class A
Tenancy Type Multi Occupancy

6



RENEWAL

Deal Size 3,428 SF
Sign Date 06/28/2022
Lease Term 62 Months
07/01/2022 - 08/31/2027

Notes -

Base Rent $4.10 FSG / Mo
Effective Rent $4.28 FSG / Mo
Asking Rent -
Escalations 3.5
Free Rent Months 4 mo
TIA $0.00

Space Usage General Office
Parking Ratio 3 / 1,000

Tenant TOKYU LAND US CORPORATION
Tenant Rep CBRE | Mitsuko Aso, Kenji Sakai
Sevenly Group, Inc. | Ben L. Gary
Lessor DE Pacific 12100, LLC
Lessor Rep CBRE | Kenji Sakai

COMPS_BRENTWOOD 18 MONTHS_TBOWER

Prepared on 11/23/2022 | **42** Records

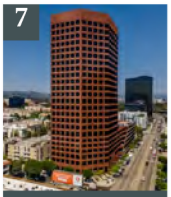
CBRE

11755 Wilshire Blvd - Wilshire Landmark I

11755 Wilshire Blvd, Los Angeles, CA 90025

Location Los Angeles - West Los Angeles - Brentwood
Property Size 338,960 SF
Built | Reno 1986 | 1986
Building Info Office | General Office | Class A
Tenancy Type Multi Occupancy

7



RENEWAL

Deal Size 10,822 SF
Sign Date 06/10/2022
Lease Term 39 Months
05/01/2023 - 07/31/2026

Notes -

Base Rent $4.85 FSG / Mo
Effective Rent -
Asking Rent -
Escalations 3.5
Free Rent Months 3 mo
TIA $0.00

Space Usage General Office
Parking Ratio 3 / 1,000

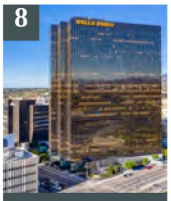
Tenant Broadshore Capital Partners
Tenant Rep Newmark | A.J. Dorn
Lessor CSHV Wilshire Landmark, Llc
Lessor Rep CBRE | Raquel Binswanger, Bryan Dunne

Wells Fargo Center

11601 Wilshire Blvd, Los Angeles, CA 90025

Location Los Angeles - West Los Angeles - Brentwood
Property Size 500,475 SF
Built | Reno 1984 | -
Building Info Office | General Office | Class A
Tenancy Type Multi Occupancy

8



RENEWAL

Deal Size 9,295 SF
Sign Date 06/03/2022
Lease Term 60 Months
11/01/2022 - 10/31/2027

Notes -

Base Rent $5.50 FSG / Mo
Effective Rent -
Asking Rent -
Escalations 3.45
Free Rent Months 3 mo
TIA $0.00

Space Usage General Office
Parking Ratio 2.5 / 1,000

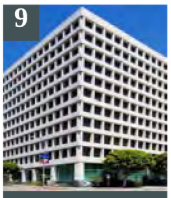
Tenant Wells Fargo Bank NA
Tenant Rep CBRE | Adam Seltzer
Lessor Hudson Properties, LLC
Lessor Rep Hudson Pacific Properties, Inc. | Jeff Lasky

West Wilshire Center

11620 Wilshire Blvd, Los Angeles, CA 90025

Location Los Angeles - West Los Angeles - Brentwood
Property Size 186,963 SF
Built | Reno 1976 | 2002
Building Info Office | General Office | Class B
Tenancy Type Multi Occupancy

9



NEW LEASE
SUBLEASE

Deal Size 2,742 SF
Sign Date 06/02/2022
Lease Term 47 Months
06/15/2022 - 04/30/2026

Notes -

Base Rent $1.25 FSG / Mo
Effective Rent $2.37 FSG / Mo
Asking Rent -
Escalations 0.0
Free Rent Months 0 mo
TIA $0.00

Space Usage General Office
Parking Ratio 3 / 1,000

Tenant Roger A. Brown & Co. LLP
Tenant Rep CBRE | Raquel Binswanger, David Freitag
Lessor Stoll, Nussbaum & Polakov, a California Professional Corp.
Lessor Rep Westmac | Luke Palmo

COMPS_BRENTWOOD 18 MONTHS_TBOWER

Prepared on 11/23/2022 | **42** Records

CBRE

11755 Wilshire Blvd - Wilshire Landmark I
11755 Wilshire Blvd, Los Angeles, CA 90025

Location Los Angeles - West Los Angeles - Brentwood
Property Size 338,960 SF
Built | Reno 1986 | 1986
Building Info Office | General Office | Class A
Tenancy Type Multi Occupancy

10



NEW LEASE

Deal Size 6,347 SF
Sign Date 05/19/2022
Lease Term 130 Months
02/01/2023 - 11/30/2033

Notes -

Base Rent $5.35 FSG / Mo
Effective Rent -
Asking Rent -
Escalations 4.0
Free Rent Months 10 mo
TIA $0.00

Space Usage General Office
Parking Ratio 3 / 1,000

Tenant Palm Tree LLC
Tenant Rep Guardian Commercial Realty | Robert Chavez
Lessor CSHV Wilshire Landmark, Llc
Lessor Rep CBRE | Raquel Binswanger, Bryan Dunne

11755 Wilshire Blvd - Wilshire Landmark I
11755 Wilshire Blvd, Los Angeles, CA 90025

Location Los Angeles - West Los Angeles - Brentwood
Property Size 338,960 SF
Built | Reno 1986 | 1986
Building Info Office | General Office | Class A
Tenancy Type Multi Occupancy

11



RENEWAL

Deal Size 5,234 SF
Sign Date 05/19/2022
Lease Term 39 Months
12/01/2022 - 02/28/2026

Notes -

Base Rent $4.75 FSG / Mo
Effective Rent -
Asking Rent -
Escalations 3.5
Free Rent Months 3 mo
TIA $0.00

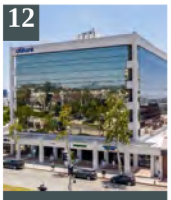
Space Usage General Office
Parking Ratio 3 / 1,000

Tenant Karlin Asset Management, Inc.
Tenant Rep None Involved | -
Lessor CSHV Wilshire Landmark, Llc
Lessor Rep CBRE | Raquel Binswanger, Bryan Dunne

Brentwood Executive Plaza
11726 San Vicente Blvd, Los Angeles, CA 90049

Location Los Angeles - West Los Angeles - Brentwood
Property Size 90,307 SF
Built | Reno 1983 | 1996
Building Info Office | General Office | Class A
Tenancy Type Multi Occupancy

12



RENEWAL

Deal Size 1,590 SF
Sign Date 05/12/2022
Lease Term 37 Months
08/01/2022 - 08/31/2025

Notes -

Base Rent $4.20 FSG / Mo
Effective Rent $4.24 FSG / Mo
Asking Rent -
Escalations 3.5
Free Rent Months 1 mo
TIA $0.00

Space Usage General Office
Parking Ratio 3 / 1,000

Tenant EDGELINE CAPITAL PARTNERS, LLC
Tenant Rep CBRE | Lauren Morris, Blake Mirkin
Lessor Douglas Emmett
Lessor Rep Douglas Emmett, Inc. | Clayton Hjulberg

COMPS_BRENTWOOD 18 MONTHS_TBOWER

Prepared on 11/23/2022 | **42** Records

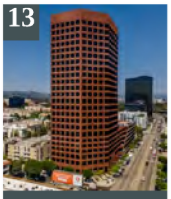
CBRE

11755 Wilshire Blvd - Wilshire Landmark I

11755 Wilshire Blvd, Los Angeles, CA 90025

Location Los Angeles - West Los Angeles - Brentwood
Property Size 338,960 SF
Built | Reno 1986 | 1986
Building Info Office | General Office | Class A
Tenancy Type Multi Occupancy

13



NEW LEASE

Deal Size 1,625 SF
Sign Date 04/19/2022
Lease Term 5 Months
07/01/2022 - 11/30/2022

Notes -

Base Rent $5.30 FSG / Mo
Effective Rent $5.32 FSG / Mo
Asking Rent -
Escalations 3.5%
Free Rent Months 5 mo
TIA $55.00

Space Usage General Office
Parking Ratio 3 / 1,000

Tenant Wheelock Street Capital, LLC
Tenant Rep JLL | Cassie Trosclair
Lessor CSHV Wilshire Landmark, Llc
Lessor Rep CBRE | Raquel Binswanger, Bryan Dunne

Topa Plaza

11911 San Vicente Blvd, Los Angeles, CA 90049

Location Los Angeles - West Los Angeles - Brentwood
Property Size 91,431 SF
Built | Reno 1989 | -
Building Info Office | General Office | Class A
Tenancy Type Multi Occupancy

14



NEW LEASE

Deal Size 3,167 SF
Sign Date 04/18/2022
Lease Term 39 Months
05/01/2022 - 07/31/2025

Notes -

Base Rent $5.50 FSG / Mo
Effective Rent $5.27 FSG / Mo
Asking Rent -
Escalations 3.0%
Free Rent Months 3 mo
TIA $0.00

Space Usage General Office
Parking Ratio 3.5 / 1,000

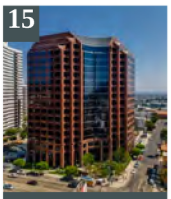
Tenant CORAL TREE PARTNERS
Tenant Rep CBRE | Quinn Ruiz Edwards, Jake Bobek, Scott Steuber, Gregg Pasternack
Lessor 11911 SAN VICENTE, LLC
Lessor Rep Industry Partners | TIM DORNAN

Landmark II

11766 Wilshire Blvd, Los Angeles, CA 90025

Location Los Angeles - West Los Angeles - Brentwood
Property Size 393,744 SF
Built | Reno 1989 | -
Building Info Office | General Office | Class A
Tenancy Type Multi Occupancy

15



NEW LEASE

Deal Size 7,833 SF
Sign Date 04/12/2022
Lease Term 126 Months
08/01/2022 - 02/01/2033

Notes -

Base Rent $3.45 FSG / Mo
Effective Rent $3.77 FSG / Mo
Asking Rent -
Escalations 3%
Free Rent Months 6 mo
TIA $90.00

Space Usage General Office
Parking Ratio 3 / 1,000

Tenant The Republic of Finland (Consulate General of Finland Los Angeles)
Tenant Rep CBRE | Alexander Solonin
Lessor DOUGLAS EMMETT 1995 LLC
Lessor Rep Self-Represented | -

COMPS_BRENTWOOD 18 MONTHS_TBOWER

Prepared on 11/23/2022 | **42** Records

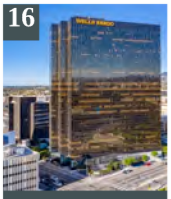
CBRE

Wells Fargo Center

11601 Wilshire Blvd, Los Angeles, CA 90025

Location Los Angeles - West Los Angeles - Brentwood
Property Size 500,475 SF
Built | Reno 1984 | -
Building Info Office | General Office | Class A
Tenancy Type Multi Occupancy

16



RENEWAL

Deal Size 5,529 SF
Sign Date 04/08/2022
Lease Term 26 Months
11/01/2022 - 12/31/2024

Notes -

Base Rent $5.35 FSG / Mo
Effective Rent $5.05 FSG / Mo
Asking Rent -
Escalations 3.5%
Free Rent Months 2 mo
TIA $0.00

Space Usage General Office
Parking Ratio 2.5 / 1,000

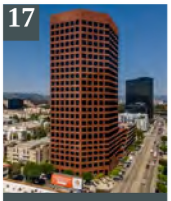
Tenant RCLCO (Robert Charles & Co., LLC)
Tenant Rep CBRE | Jeffrey Gerlach, Stanley Gerlach Jr
Lessor LA Realty Partners, c/o Hudson Pacific Properties
Lessor Rep L A Realty Partners | Lisa St John

11755 Wilshire Blvd - Wilshire Landmark I

11755 Wilshire Blvd, Los Angeles, CA 90025

Location Los Angeles - West Los Angeles - Brentwood
Property Size 338,960 SF
Built | Reno 1986 | 1986
Building Info Office | General Office | Class A
Tenancy Type Multi Occupancy

17



EXPANSION

Deal Size 2,197 SF
Sign Date 04/01/2022
Lease Term 30 Months
09/01/2022 - 02/28/2025

Notes -

Base Rent $5.40 FSG / Mo
Effective Rent $5.32 FSG / Mo
Asking Rent -
Escalations 3.5
Free Rent Months 12 mo
TIA $0.00

Space Usage General Office
Parking Ratio 3 / 1,000

Tenant CITIZENS BANK NA
Tenant Rep Cushman & Wakefield | Locke Burnette
Lessor CSHV Wilshire Landmark, Llc
Lessor Rep CBRE | Raquel Binswanger, Bryan Dunne

12100 Wilshire Blvd

12100 Wilshire Blvd, Los Angeles, CA 90025

Location Los Angeles - West Los Angeles - Brentwood
Property Size 365,325 SF
Built | Reno 1985 | -
Building Info Office | General Office | Class A
Tenancy Type Multi Occupancy

18



EXPANSION

Deal Size 4,258 SF
Sign Date 03/24/2022
Lease Term 12 Months
04/01/2022 - 03/31/2023

Notes -

Base Rent $3.65 FSG / Mo
Effective Rent $4.54 FSG / Mo
Asking Rent -
Escalations 0%
Free Rent Months 0 mo
TIA $30.00

Space Usage General Office
Parking Ratio 3 / 1,000

Tenant IBORROW
Tenant Rep JLL | Jason Fine CBRE | David Swatt
Lessor Douglas Emmett Management
Lessor Rep Douglas Emmett, Inc. | Bob Zelkin

COMPS_BRENTWOOD 18 MONTHS_TBOWER

Prepared on 11/23/2022 | **42** Records

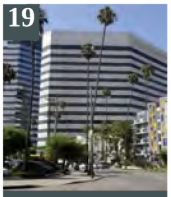
CBRE

Wilshire Bundy Plaza

12121 Wilshire Blvd, Los Angeles, CA 90025

Location Los Angeles - West Los Angeles - Brentwood
Property Size 313,749 SF
Built | Reno 1984 | 2007
Building Info Office | General Office | Class B
Tenancy Type Multi Occupancy

19



RENEWAL

Deal Size 7,054 SF
Sign Date 03/09/2022
Lease Term 38 Months
10/01/2022 - 11/30/2025

Base Rent $3.70 FSG / Mo
Effective Rent $4.00 FSG / Mo
Asking Rent -
Escalations 3%
Free Rent Months 1.5 mo
TIA $0.00

Space Usage General Office
Parking Ratio 3 / 1,000

Tenant Wealth Enhancement Group (Oakwood Capital Management)
Tenant Rep CBRE | Jeffrey Gerlach, Stanley Gerlach Jr, Brandon Megal, Emily Nicoll, Nick Pappas
Lessor Douglas Emmett (DE 12121 Wilshire, LP)
Lessor Rep Andrew Goodman Foundation Inc | -

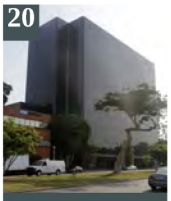
Notes -

11611 San Vicente Blvd - Brentwood Gateway

11611 San Vicente Blvd, Los Angeles, CA 90049

Location Los Angeles - West Los Angeles - Brentwood
Property Size 104,716 SF
Built | Reno 1977 | 2020
Building Info Office | General Office | Class A
Tenancy Type Multi Occupancy

20



EXPANSION

Deal Size 7,851 SF
Sign Date 01/10/2022
Lease Term 65 Months
05/01/2023 - 09/30/2028

Base Rent $6.42 FSG / Mo
Effective Rent $5.41 FSG / Mo
Asking Rent -
Escalations 3.0%
Free Rent Months 6 mo
TIA $0.00

Space Usage General Office
Parking Ratio 2.71 / 1,000

Tenant Oaktree Capital Management LP
Tenant Rep CBRE | Richard Ratner, Blake Mirkin
Lessor SARAGOSSA LLC
Lessor Rep CBRE | Richard Ratner, Blake Mirkin

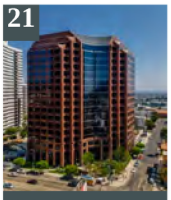
Notes -

Landmark II

11766 Wilshire Blvd, Los Angeles, CA 90025

Location Los Angeles - West Los Angeles - Brentwood
Property Size 393,744 SF
Built | Reno 1989 | -
Building Info Office | General Office | Class A
Tenancy Type Multi Occupancy

21



RENEWAL

Deal Size 2,024 SF
Sign Date 12/03/2021
Lease Term 63 Months
04/01/2022 - 06/30/2027

Base Rent $3.78 FSG / Mo
Effective Rent $3.89 FSG / Mo
Asking Rent -
Escalations 3.5
Free Rent Months 3 mo
TIA $15.00

Space Usage General Office
Parking Ratio 3 / 1,000

Tenant ISRAEL MINISTRY OF TOURISM
Tenant Rep CBRE | Steven Barton, Mark Landver
Lessor DOUGLAS EMMETT 1995 LLC
Lessor Rep -

Notes -

COMPS_BRENTWOOD 18 MONTHS_TBOWER

Prepared on 11/23/2022 | **42** Records

CBRE

640 N Sepulveda Blvd
640 N Sepulveda Blvd, Los Angeles, CA 90049

Location Los Angeles - West Los Angeles - Brentwood
Property Size 45,630 SF
Built | Reno 1987 | 1992
Building Info Office | General Office | Class A
Tenancy Type Multi Occupancy



Deal Size 5,000 SF
Sign Date 12/02/2021
Lease Term 40 Months
12/03/2021 - 04/02/2025

Base Rent $5.63 NNN / Mo
Effective Rent $5.41 NNN / Mo
Asking Rent -
Escalations 3%
Free Rent Months 3 mo
TIA $0.00

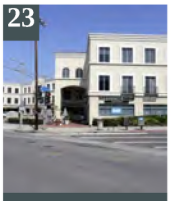
Space Usage General Office
Parking Ratio 4.49 / 1,000

Tenant Invisible Narratives
Tenant Rep -
Lessor 640 ASSOCIATES, LLC
Lessor Rep CBRE | Ryan Gurman, Neal Golub
1st Property Group | Ben Silver

Notes ($5.63 for 8 months) // ($5.8 for 12 months) // ($5.97 for 12 months) // ($6.15 for 4 months) // ($0 for 3 months)

Topa Plaza
11911 San Vicente Blvd, Los Angeles, CA 90049

Location Los Angeles - West Los Angeles - Brentwood
Property Size 91,431 SF
Built | Reno 1989 | -
Building Info Office | General Office | Class A
Tenancy Type Multi Occupancy



Deal Size 1,201 SF
Sign Date 11/24/2021
Lease Term 59 Months
01/01/2023 - 12/31/2027

Base Rent $5.50 FSG / Mo
Effective Rent $5.90 FSG / Mo
Asking Rent -
Escalations 3.5
Free Rent Months 0 mo
TIA $0.00

Space Usage General Office
Parking Ratio 3.5 / 1,000

Tenant South Street Capital Partners, LLC
Tenant Rep CBRE | Raquel Binswanger, David Freitag
Lessor 11911 San Vicente, LLC c/o Anderson Real Estate
Lessor Rep -

Notes -

640 N Sepulveda Blvd
640 N Sepulveda Blvd, Los Angeles, CA 90049

Location Los Angeles - West Los Angeles - Brentwood
Property Size 45,630 SF
Built | Reno 1987 | 1992
Building Info Office | General Office | Class A
Tenancy Type Multi Occupancy



Deal Size 7,400 SF
Sign Date 11/22/2021
Lease Term 67 Months
02/01/2022 - 08/31/2027

Base Rent $3.00 NNN / Mo
Effective Rent $2.90 NNN / Mo
Asking Rent -
Escalations 3%
Free Rent Months 4 mo
TIA $0.00

Space Usage General Office
Parking Ratio 4.49 / 1,000

Tenant Signify Technology Group, Inc.
Tenant Rep -
Lessor 640 ASSOCIATES, LLC
Lessor Rep CBRE | Ryan Gurman, Neal Golub
1st Property Group | Ben Silver

Notes -

COMPS_BRENTWOOD 18 MONTHS_TBOWER

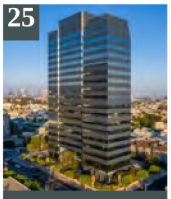
Prepared on 11/23/2022 | **42** Records

CBRE

12100 Wilshire Blvd

12100 Wilshire Blvd, Los Angeles, CA 90025

Location Los Angeles - West Los Angeles - Brentwood
Property Size 365,325 SF
Built | Reno 1985 | -
Building Info Office | General Office | Class A
Tenancy Type Multi Occupancy



Deal Size 6,334 SF
Sign Date 11/17/2021
Lease Term 39 Months
01/03/2022 - 04/02/2025

Notes -

Base Rent $3.61 FSG / Mo
Effective Rent $3.75 FSG / Mo
Asking Rent -
Escalations 3.0
Free Rent Months 3 mo
TIA $0.00

Space Usage General Office
Parking Ratio 3 / 1,000

Tenant Gibbs, Giden, Locher, Turner, Senet & Wittbrodt LLP
Tenant Rep CBRE | Michelle Esquivel Hall, Jeffrey Pion
Lessor DE Pacific 12100, LLC
Lessor Rep Douglas Emmett, Inc. | Bob Zelkin

Saltair San Vicente

12011 San Vicente Blvd, Los Angeles, CA 90049

Location Los Angeles - West Los Angeles - Brentwood
Property Size 55,730 SF
Built | Reno 1964 | -
Building Info Office | General Office | Class B
Tenancy Type Multi Occupancy



Deal Size 1,840 SF
Sign Date 11/01/2021
Lease Term 123 Months
11/01/2020 - 01/31/2031

Notes -

Base Rent $2.50 FSG / Mo
Effective Rent $2.87 FSG / Mo
Asking Rent -
Escalations 3%
Free Rent Months 0 mo
TIA $0.00

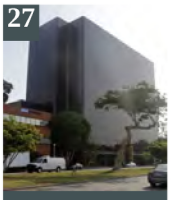
Space Usage General Office
Parking Ratio 3 / 1,000

Tenant Function Physical Therapy Corporation
Tenant Rep CBRE | Michelle Esquivel Hall, Jeffrey Pion
Lessor Douglas Emmett
Lessor Rep -

11611 San Vicente Blvd - Brentwood Gateway

11611 San Vicente Blvd, Los Angeles, CA 90049

Location Los Angeles - West Los Angeles - Brentwood
Property Size 104,716 SF
Built | Reno 1977 | 2020
Building Info Office | General Office | Class A
Tenancy Type Multi Occupancy



Deal Size 11,211 SF
Sign Date 10/22/2021
Lease Term 132 Months
07/01/2022 - 06/30/2033

Notes -

Base Rent $3.75 NNN / Mo
Effective Rent $3.37 NNN / Mo
Asking Rent -
Escalations -
Free Rent Months 6 mo
TIA $80.00

Space Usage General Office
Parking Ratio 2.71 / 1,000

Tenant Monarch LLC
Tenant Rep Thirty Three Group | Rachel Rosenberg
Lessor SARAGOSSA LLC
Lessor Rep CBRE | Jacob Althaus

COMPS_BRENTWOOD 18 MONTHS_TBOWER

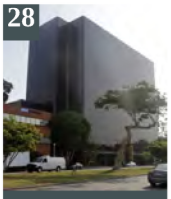
Prepared on 11/23/2022 | **42** Records

CBRE

11611 San Vicente Blvd - Brentwood Gateway
11611 San Vicente Blvd, Los Angeles, CA 90049

Location Los Angeles - West Los Angeles - Brentwood
Property Size 104,716 SF
Built | Reno 1977 | 2020
Building Info Office | General Office | Class A
Tenancy Type Multi Occupancy

28



NEW LEASE

Deal Size 1,945 SF
Sign Date 10/18/2021
Lease Term 60 Months
11/01/2021 - 10/31/2026

Notes -

Base Rent $4.40 FSG / Mo
Effective Rent $4.37 FSG / Mo
Asking Rent -
Escalations 3.0
Free Rent Months 48 mo
TIA $0.00

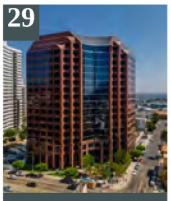
Space Usage General Office
Parking Ratio 2.71 / 1,000

Tenant Related Fund Management, LLC
Tenant Rep -
Lessor Brentwood Square
Lessor Rep CBRE | Bryan Dunne

Landmark II
11766 Wilshire Blvd, Los Angeles, CA 90025

Location Los Angeles - West Los Angeles - Brentwood
Property Size 393,744 SF
Built | Reno 1989 | -
Building Info Office | General Office | Class A
Tenancy Type Multi Occupancy

29



OPTION

Deal Size 4,000 SF
Sign Date 10/15/2021
Lease Term 9 Months
01/01/2022 - 09/30/2022

Notes Rent escalation: $263.35

Base Rent $4.61 NNN / Mo
Effective Rent $4.65 NNN / Mo
Asking Rent -
Escalations $263.35
Free Rent Months 0 mo
TIA $0.00

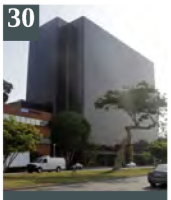
Space Usage General Office
Parking Ratio 3 / 1,000

Tenant Caltius Capital Management, LP
Tenant Rep CBRE | Nicholas Christensen
Lessor DOULGAS EMMETT 1995, LLC
Lessor Rep Douglas Emmett, Inc. | Bob Zelken

11611 San Vicente Blvd - Brentwood Gateway
11611 San Vicente Blvd, Los Angeles, CA 90049

Location Los Angeles - West Los Angeles - Brentwood
Property Size 104,716 SF
Built | Reno 1977 | 2020
Building Info Office | General Office | Class A
Tenancy Type Multi Occupancy

30



NEW LEASE

Deal Size 2,874 SF
Sign Date 10/11/2021
Lease Term 120 Months
04/01/2022 - 04/01/2032

Notes -

Base Rent $6.25 FSG / Mo
Effective Rent $6.66 FSG / Mo
Asking Rent -
Escalations 3%
Free Rent Months 6 mo
TIA $0.00

Space Usage General Office
Parking Ratio 2.71 / 1,000

Tenant Hanover R.S., LP
Tenant Rep -
Lessor SARAGOSSA LLC
Lessor Rep CBRE | Richard Ratner, Blake Mirkin

COMPS_BRENTWOOD 18 MONTHS_TBOWER

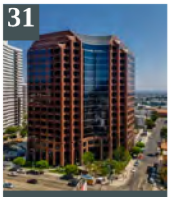
Prepared on 11/23/2022 | **42** Records

CBRE

Landmark II

11766 Wilshire Blvd, Los Angeles, CA 90025

Location Los Angeles - West Los Angeles - Brentwood
Property Size 393,744 SF
Built | Reno 1989 | -
Building Info Office | General Office | Class A
Tenancy Type Multi Occupancy



NEW LEASE

Deal Size 2,890 SF
Sign Date 10/07/2021
Lease Term 60 Months
02/01/2022 - 01/30/2027

Notes -

Base Rent $3.90 FSG / Mo
Effective Rent $4.18 FSG / Mo
Asking Rent -
Escalations $0.00
Free Rent Months 0 mo
TIA $0.00

Space Usage General Office
Parking Ratio 3 / 1,000

Tenant L&S Advisors, Inc
Tenant Rep CBRE | Martin Barkan
Lessor DOUGLAS EMMETT 1995 LLC
Lessor Rep -

520 S Sepulveda Blvd

520 S Sepulveda Blvd, Los Angeles, CA 90049

Location Los Angeles - West Los Angeles - Brentwood
Property Size 21,628 SF
Built | Reno 1970 | -
Building Info Office | General Office | Class C
Tenancy Type Multi Occupancy



NEW LEASE

Deal Size 1,122 SF
Sign Date 09/01/2021
Lease Term 24 Months
-

Notes -

Base Rent $3.50 FSG / Mo
Effective Rent $3.21 FSG / Mo
Asking Rent -
Escalations 4%
Free Rent Months 2 mo
TIA $15.00

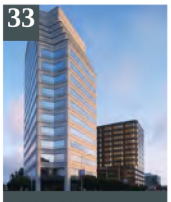
Space Usage General Office
Parking Ratio 2.96 / 1,000

Tenant Research in Progress
Tenant Rep CBRE | Gerlach Klingensmith
Lessor Paris West Companies
Lessor Rep Paris West Companies | -

Wilshire Brentwood Plaza

12400 Wilshire Blvd, Los Angeles, CA 90025

Location Los Angeles - West Los Angeles - Brentwood
Property Size 246,575 SF
Built | Reno 1985 | -
Building Info Office | General Office | Class A
Tenancy Type Multi Occupancy



RENEWAL

Deal Size 7,228 SF
Sign Date 08/26/2021
Lease Term 36 Months
09/01/2021 - 08/31/2024

Notes Electric & Taxes - Not listed in lease Operating expenses - Section D7. Commencing on September, 2021 and throughout the Third Extended Term, the Base Year shall be calendar year 2021, provided that Tenant shall not be obligated to pay, not shall Tenant accrue charges for, Tenant's Share of Operating Expenses until the first calendar day of the thirteenth (13th) full calendar month of The Third Extended Term. Section D8. Commencing September 1, 2021 and throughout the Third Extended Term, Tenant's Share of Operating Expenses for the Premises, shall be 3.20%.

Base Rent $3.95 MG / Mo
Effective Rent $4.09 MG / Mo
Asking Rent -
Escalations 3.5%
Free Rent Months 0 mo
TIA $0.00

Space Usage General Office
Parking Ratio 3 / 1,000

Tenant Endoscopy Center of Santa Monica, LLC c/o Cedars-Sinai Medical Center
Tenant Rep CBRE | Claire Doney, Spencer Thomas, Mark Sprague, Richard Doney
Lessor Douglass Emmett 2015, LLC, a Delaware limited liability company
Lessor Rep -

COMPS_BRENTWOOD 18 MONTHS_TBOWER

Prepared on 11/23/2022 | **42** Records

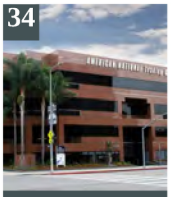
CBRE

Wilshire Centre

12300 Wilshire Blvd, Los Angeles, CA 90025

Location Los Angeles - West Los Angeles - Brentwood
Property Size 46,579 SF
Built | Reno 1985 | -
Building Info Office | General Office | Class B
Tenancy Type Multi Occupancy

34



RENEWAL

Deal Size 4,417 SF
Sign Date 08/02/2021
Lease Term 75 Months
09/01/2021 - 11/30/2027

Base Rent $3.50 FSG / Mo
Effective Rent $3.52 FSG / Mo
Asking Rent -
Escalations 3.0
Free Rent Months 3 mo
TIA $15.00

Space Usage General Office
Parking Ratio 3 / 1,000

Tenant Terry L. Jacoby Financial Management, Inc.
Tenant Rep CBRE | Michelle Esquivel Hall, Jeffrey Pion
Lessor Wilshire Tower
Lessor Rep -

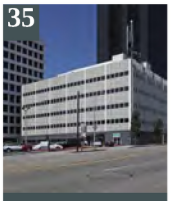
Notes -

11600 WILSHIRE BOULEVARD

11600 Wilshire Blvd, Los Angeles, CA 90025

Location Los Angeles - West Los Angeles - Brentwood
Property Size 59,459 SF
Built | Reno 1955 | 2000
Building Info Office | General Office | Class C
Tenancy Type Multi Occupancy

35



NEW LEASE

Deal Size 1,650 SF
Sign Date 06/28/2021
Lease Term 64 Months
08/01/2021 - 12/01/2026

Base Rent $4.25 FSG / Mo
Effective Rent $2.32 FSG / Mo
Asking Rent -
Escalations 3.25%
Free Rent Months 4 mo
TIA $30.00

Space Usage General Office
Parking Ratio 2.99 / 1,000

Tenant I-Sight Optometric Center, INC., a California Corporation
Tenant Rep CBRE | Alexander Solonin
Lessor CIM/ 11600 Wilshire (Los Angeles), L.P., a Deleware limited partnership
Lessor Rep -

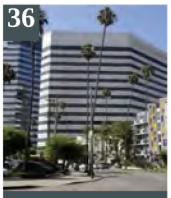
Notes ($4.25 for 10 months) // ($0 for 24 months) // ($4.39 for 10 months) // ($0 for 24 months) // ($4.68 for 12 months) // ($4.83 for 12 months) // ($4.99 for 12 months) // ($5.02 for 4 months)

Wilshire Bundy Plaza

12121 Wilshire Blvd, Los Angeles, CA 90025

Location Los Angeles - West Los Angeles - Brentwood
Property Size 313,749 SF
Built | Reno 1984 | 2007
Building Info Office | General Office | Class B
Tenancy Type Multi Occupancy

36



EXPANSION

Deal Size 4,069 SF
Sign Date 06/22/2021
Lease Term 81 Months
07/01/2021 - 03/31/2028

Base Rent $3.00 FSG / Mo
Effective Rent $3.13 FSG / Mo
Asking Rent -
Escalations 3%
Free Rent Months 4 mo
TIA $15.00

Space Usage General Office
Parking Ratio 3 / 1,000

Tenant Elite OrthoSport Physical Therapy & Performance
Tenant Rep CBRE | Michelle Esquivel Hall, Jeffrey Pion
Lessor Douglas Emmett
Lessor Rep -

Notes -

COMPS_BRENTWOOD 18 MONTHS_TBOWER

Prepared on 11/23/2022 | **42** Records

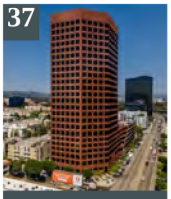
CBRE

11755 Wilshire Blvd - Wilshire Landmark I

11755 Wilshire Blvd, Los Angeles, CA 90025

Location Los Angeles - West Los Angeles - Brentwood
Property Size 338,960 SF
Built | Reno 1986 | 1986
Building Info Office | General Office | Class A
Tenancy Type Multi Occupancy

37



RENEWAL

Deal Size 6,031 SF
Sign Date 06/04/2021
Lease Term 40 Months
11/01/2021 - 02/28/2025

Notes -

Base Rent $5.20 FSG / Mo
Effective Rent $5.04 FSG / Mo
Asking Rent -
Escalations 3.5%
Free Rent Months 3 mo
TIA $15.00

Space Usage General Office
Parking Ratio 3 / 1,000

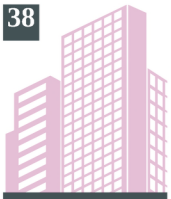
Tenant CITIZENS BANK NA
Tenant Rep Cushman & Wakefield | Locke Burnette
Lessor Cal STRS
Lessor Rep CBRE | Raquel Binswanger, Bryan Dunne

11759 SAN VICENTE BLVD.

11759 San Vicente Blvd, Los Angeles, CA 90049

Location Los Angeles - West Los Angeles - Brentwood
Property Size 8,260 SF
Built | Reno - | -
Building Info Office | General Office | -
Tenancy Type Multi Occupancy

38



NEW LEASE
SUBLEASE

Deal Size 1,291 SF
Sign Date 03/30/2021
Lease Term 7 Months
05/01/2021 - 11/30/2021

Notes -

Base Rent $4.35 FSG / Mo
Effective Rent $4.35 FSG / Mo
Asking Rent -
Escalations $0.00
Free Rent Months 1 mo
TIA $0.00

Space Usage General Office
Parking Ratio -

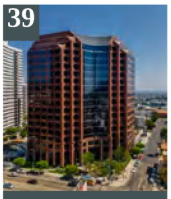
Tenant LEDO CAPITAL GROUP, LLC
Tenant Rep -
Lessor WEST COAST HOSIERY GROUP, LLC
Lessor Rep CBRE | Brandon Cohan, Evan Clark

Landmark II

11766 Wilshire Blvd, Los Angeles, CA 90025

Location Los Angeles - West Los Angeles - Brentwood
Property Size 393,744 SF
Built | Reno 1989 | -
Building Info Office | General Office | Class A
Tenancy Type Multi Occupancy

39



RENEWAL

Deal Size 5,267 SF
Sign Date 03/02/2021
Lease Term 9 Months
04/01/2021 - 12/31/2021

Notes Approximately 4,000 additional SF given rent-free for 9 months.

Base Rent $3.65 NNN / Mo
Effective Rent $3.50 NNN / Mo
Asking Rent -
Escalations $0.00
Free Rent Months 0 mo
TIA $0.00

Space Usage General Office
Parking Ratio 3 / 1,000

Tenant Caltius Capital Management, LP
Tenant Rep CBRE | Nicholas Christensen
Lessor DOUGLAS EMMETT 1995 LLC
Lessor Rep -

COMPS_BRENTWOOD 18 MONTHS_TBOWER

Prepared on 11/23/2022 | **42** Records

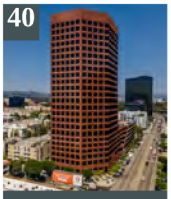
CBRE

11755 Wilshire Blvd - Wilshire Landmark I

11755 Wilshire Blvd, Los Angeles, CA 90025

Location Los Angeles - West Los Angeles - Brentwood
Property Size 338,960 SF
Built | Reno 1986 | 1986
Building Info Office | General Office | Class A
Tenancy Type Multi Occupancy

40



RENEWAL

Deal Size 4,575 SF
Sign Date 02/25/2021
Lease Term 27 Months
03/01/2021 - 06/15/2023

Notes -

Base Rent $4.50 NNN / Mo
Effective Rent $5.43 NNN / Mo
Asking Rent -
Escalations 3.0
Free Rent Months 0 mo
TIA $0.00

Space Usage General Office
Parking Ratio 3 / 1,000

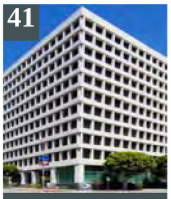
Tenant Philip Michels a professional law corp.
Tenant Rep Guardian Commercial Realty | -
Lessor CHSV Wilshire Landmark, LLC
Lessor Rep CBRE | Raquel Binswanger, Bryan Dunne

West Wilshire Center

11620 Wilshire Blvd, Los Angeles, CA 90025

Location Los Angeles - West Los Angeles - Brentwood
Property Size 186,963 SF
Built | Reno 1976 | 2002
Building Info Office | General Office | Class B
Tenancy Type Multi Occupancy

41



RENEWAL

Deal Size 1,759 SF
Sign Date 02/01/2021
Lease Term 65 Months
02/01/2021 - 06/30/2026

Notes -

Base Rent $3.15 FSG / Mo
Effective Rent -
Asking Rent $3.85 FSG / Mo
Escalations -
Free Rent Months 5 mo
TIA $20.00

Space Usage General Office
Parking Ratio 3 / 1,000

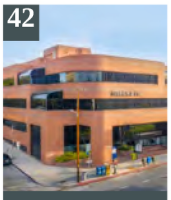
Tenant Mail2world, Inc.
Tenant Rep -
Lessor CIM Group, LP
Lessor Rep Madison Partners | -

Brentwood Saltair

11999 San Vicente Blvd, Los Angeles, CA 90049

Location Los Angeles - West Los Angeles - Brentwood
Property Size 60,502 SF
Built | Reno 1986 | -
Building Info Office | General Office | Class A
Tenancy Type Multi Occupancy

42



MONTH TO MONTH

Deal Size 2,134 SF
Sign Date 01/27/2021
Lease Term 24 Months
03/01/2021 - 02/28/2023

Notes -

Base Rent $3.75 FSG / Mo
Effective Rent $3.82 FSG / Mo
Asking Rent -
Escalations 3
Free Rent Months 0 mo
TIA $0.00

Space Usage General Office
Parking Ratio 3 / 1,000

Tenant VENBROOK GROUP, LLC
Tenant Rep CBRE | Richard Ratner, Blake Mirkin
Lessor Douglas Emmett
Lessor Rep Douglas Emmett, Inc. | -

Rental Survey — Retail - Un-Anchored Retail Strip — No. 1

Property Name	Topa Town & Country Plaza
Address	11640 San Vicente Boulevard Brentwood, CA 90049
County	Los Angeles
Govt./Tax ID	4265-005-020
Gross Leasable Area (GLA)	34,278 sf
Condition	Average
Number of Buildings	2
Parking Type/Ratio	Surface/ 2.71:1,000 sf
Year Built/Renovated	1977/ N/A
Floor Count	2
Occupancy Type	Multi-tenant
Land Area Net	1.466 ac/ 63,867 sf
Shape	Rectangular
Zoning	N/A
Construction Class/ Type	D/ Average
Exterior Finish	Wood



Quoted Terms

Reimbursements	NNN	Rent Changes/Steps	Annual Fixed
Occupancy / In Line	97% / 97%	Free Rent	N/A
Tenant Size	800 sf	TI Allowance	N/A
Lease Term	60 Mo(s).	Reimbursement Amount	$0.80 per sf
Survey Date	09/2021	Total Oper. & Fixed Exp.	N/A
Verification	Darren Bell / 310-203-9199	Annual Base Rent	$54.00 - $78.00 per sf

Actual Leases

Tenant Name	Tenancy Use Type	Size (sf)	Term (Mo.)	Type of Lease	Start Date	Reimbs.	Rent Changes / Steps	Free Rent (Mo.)	TI Allowance per sf	Annual Base Rate per sf
Cafe Lux	Retail	1,443	60	New	Jan 2017	NNN	Annual 3.0%	0.00	$0.00	$78.00

Comments

This comparable is the Topa Town & Country Plaza, a two-story, multi-tenant retail/office building located on the south side of San Vicente Boulevard, east of Barrington Avenue in the affluent community of Brentwood in West Los Angeles. Built in 1977, the center has a net rentable area of 34,278 square feet situated on a 0.50-acre parcel. Onsite surface parking is provided at a ratio of 2.71-spaces per 1,000 SF of building area. As of the date of survey, the center was 91.8% leased (retail portion is 100% occupied). Major tenants include FrontRunners, Soul Cycle, Sugarfish, and more. The most recent retail lease achieved a starting rental rate of $6.50 PSF per month, triple net, for a 1,443 SF space. The space was leased to Café Lux for a five-year duration. The current asking rate for a 1,451 SF ground floor shop space is $12,000 per month or $99.24 PSF per year, gross (triple nets are included in monthly rental rate).

Rental Survey — Retail - Un-Anchored Retail Strip — No. 2

Property Name	11906-11928 San Vicente Boulevard
Address	11906-11928 San Vicente Boulevard Los Angeles, CA 90049
County	Los Angeles
Govt./Tax ID	4265-007-035, -036
Gross Leasable Area (GLA)	12,128 sf
Condition	Average
Number of Buildings	2
Parking Type/Ratio	N/A/ N/A
Year Built/Renovated	1927/ 2014
Floor Count	1
Occupancy Type	Multi-tenant
Land Area Net	0.460 ac/ 20,018 sf
Shape	Triangular
Zoning	C1.5 Limited Commercial Zone
Construction Class/ Type	C/ Average
Exterior Finish	Brick



Quoted Terms

Reimbursements	NNN	Rent Changes/Steps	Annual 3.0%
Occupancy / In Line	60% / 60%	Free Rent	N/A
Tenant Size	N/A	TI Allowance	N/A
Lease Term	N/A	Reimbursement Amount	N/A
Survey Date	09/2021	Total Oper. & Fixed Exp.	N/A
Verification	N/A	Annual Base Rent	per sf

Actual Leases

Tenant Name	Tenancy Use Type	Size (sf)	Term (Mo.)	Type of Lease	Start Date	Reimbs.	Rent Changes / Steps	Free Rent (Mo.)	TI Allowance per sf	Annual Base Rate per sf
Confidential Retail	Retail	1,885	60	New	Jan 2019	NNN	Annual 3.0%	0.00	$0.00	$133.32
Confidential Retail	Retail	1,946	120	New	Nov 2018	NNN	Annual 4.0%	0.00	$0.00	$141.48

Comments

This comparable is a smaller scale specialty shopping center catering to local residents. It is located at the southwest corner of San Vicente Boulevard and Montana Avenue, in the community of Brentwood (Los Angeles City limits). The improvements consist of two buildings totaling 16,098 square feet, and situated on a 0.47-acre site. There are 12 surface, onsite parking spaces; additional offsite parking is provided. Building One (11918 San Vicente Boulevard) consist of a one-story plus basement, multi-tenant retail building containing 10,966 square feet (8,390 square feet of net rentable ground floor retail space and 2,576 square feet of net rentable square feet of basement space) that was originally built in 1927 and extensively renovated in 2009. Building Two (11906 San Vicente Boulevard) was recently constructed in 2013. It consists of a one-story plus basement, retail pad building containing 5,132 square feet (3,444 square feet of net rentable ground floor retail space – including patio space- and 1,688 square feet of net rentable square feet of basement space). The most recent leases achieved starting rental rates ranging from $11.11 to $15.86 PSF per month, triple net. Leases exhibit annual escalations and most spaces were delivered in a "vanilla shell" state.

Rental Survey — Retail - High Street Shops — No. 4

Property Name	Multi-Tenant Storefront Retail
Address	11682-11698 San Vicente Boulevard & 900-908 S. Barrington Avenue Los Angeles, CA 90049
County	Los Angeles
Govt./Tax ID	Multiple
Gross Leasable Area (GLA)	14,789 sf
Condition	Average
Number of Buildings	2
Parking Type/Ratio	Surface/ 2.64:1,000 sf
Year Built/Renovated	1948/ N/A
Floor Count	1
Occupancy Type	Multi-tenant
Land Area Net	0.533 ac/ 23,234 sf
Shape	Irregular
Zoning	C1.5-1VL
Construction Class/ Type	C/ Average
Exterior Finish	Concrete

Quoted Terms

Reimbursements	NNN	Rent Changes/Steps	N/A
Occupancy / In Line	87% / N/A	Free Rent	N/A
Tenant Size	922 - 2,955 sf	TI Allowance	N/A
Lease Term	N/A	Reimbursement Amount	N/A
Survey Date	06/2022	Total Oper. & Fixed Exp.	N/A
Verification	N/A	Annual Base Rent	$96.29 - $122.00 per sf

Actual Leases

Tenant Name	Tenancy Use Type	Size (sf)	Term (Mo.)	Type of Lease	Start Date	Reimbs.	Rent Changes / Steps	Free Rent (Mo.)	TI Allowance per sf	Annual Base Rate per sf
Planet Beauty	Retail	1,594	N/A	New	Aug 2017	NNN	N/A	N/A	N/A	$81.03
Eye Ball Land Inc.	Retail	922	N/A	New	Jan 2017	NNN	N/A	N/A	N/A	$75.94
Juice Crafters	Retail	950	N/A	New	Feb 2012	NNN	N/A	N/A	N/A	$83.60
Chipotle	Retail	2,030	N/A	New	Mar 2011	NNN	N/A	N/A	N/A	$96.29
Coffee Bean & Tea Leaf	Retail	1,380	N/A	New	Feb 2010	NNN	N/A	N/A	N/A	$122.00
Contempo Floor Cover	Retail	2,955	N/A	New	Mar 2009	NNN	N/A	N/A	N/A	$52.00
Claudio's Coiffeure	Retail	930	N/A	New	Jan 2007	NNN	N/A	N/A	N/A	$67.20
Sortino Restaurant	Retail	2,168	N/A	New	Nov 2003	NNN	N/A	N/A	N/A	$87.21
VACANT	Retail	1,860	N/A	Available	N/A	NNN	N/A	N/A	N/A	$90.00

Comments



1415-1419 2nd St

Santa Monica, CA 90401

Los Angeles County

Building Type:	Class C Office	Space Avail:	3,053 SF
Status:	Built 1920, Renov 1994	Max Contig:	1,749 SF
Building Size:	13,500 SF	Smallest Space:	1,304 SF
Typical Floor Size:	6,750 SF	Rent/SF/Mo:	Withheld
Stories:	2	% Leased:	77.4%
Expenses:	2021 Tax @ $2.70/sf		
Parking:	10 Reserved Spaces @ $85.00/mo; Ratio of 0.74/1,000 SF		



1422-1424 2nd St

Santa Monica, CA 90401

Los Angeles County

Building Type:	Class B Office	Space Avail:	1,708 SF
Status:	Built 1999	Max Contig:	1,708 SF
Building Size:	26,000 SF	Smallest Space:	1,708 SF
Typical Floor Size:	9,150 SF	Rent/SF/Mo:	Withheld
Stories:	3	% Leased:	100%
Expenses:	2021 Tax @ $2.91/sf; 2012 Ops @ $0.60/sf		
Parking:	4 Surface Spaces are available; Ratio of 0.15/1,000 SF		



1217 3rd St

Restoration Hardware

Santa Monica, CA 90401

Los Angeles County

Building Type:	Retail/Restaurant (Regional Mall)	Space Avail:	10,000 SF
Status:	Built 1971	Max Contig:	10,000 SF
Building Size:	10,000 SF	Smallest Space:	3,000 SF
Land Area:	14,810 SF	Rent/SF/YR:	$8.00
Stories:	1	% Leased:	100%
Expenses:	2020 Tax @ $2.81/sf		
Parking:	5 Surface Spaces are available; Ratio of 0.50/1,000 SF		



262-264 26th St

Santa Monica, CA 90402

Los Angeles County

Building Type:	Retail/Storefront Retail/Office	Space Avail:	1,454 SF
Status:	Built 1947	Max Contig:	1,454 SF
Building Size:	1,454 SF	Smallest Space:	1,454 SF
Land Area:	4,996 SF	Rent/SF/YR:	Withheld
Stories:	2	% Leased:	100%
Expenses:	2020 Tax @ $3.06/sf		
Parking:	5 Surface Spaces are available; Ratio of 3.33/1,000 SF		

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201-213 Arizona Ave

Linda Vista Mall

Santa Monica, CA 90401

Los Angeles County

Building Type:	Retail/Storefront (Regional Mall)	Space Avail:	3,000 SF
Status:	Built 1977	Max Contig:	1,000 SF
Building Size:	10,860 SF	Smallest Space:	1,000 SF
Land Area:	14,810 SF	Rent/SF/YR:	$6.00
Stories:	1	% Leased:	72.4%
Expenses:	2021 Tax @ $9.60/sf		
Parking:	81 Surface Spaces are available; Ratio of 5.00/1,000 SF		



120 Broadway

Palisades Promenade

Santa Monica, CA 90401

Los Angeles County

Building Type:	Class A Office	Space Avail:	42,766 SF
Status:	Built 1990	Max Contig:	27,022 SF
Building Size:	101,431 SF	Smallest Space:	632 SF
Typical Floor Size:	19,721 SF	Rent/SF/YR:	Withheld
Stories:	5	% Leased:	99.3%
Expenses:	2021 Tax @ $3.51/sf		
Parking:	Ratio of 3.00/1,000 SF		



721-729 Broadway

Lincoln Broadway Bldg

Santa Monica, CA 90401

Los Angeles County

Building Type:	Retail/Storefront Retail/Residential (Strip Ctr)	Space Avail:	800 SF
Status:	Built 1923, Renov 1992	Max Contig:	800 SF
Building Size:	10,000 SF	Smallest Space:	800 SF
Land Area:	5,001 SF	Rent/SF/YR:	$6.88
Stories:	2	% Leased:	92.0%
Expenses:	2021 Tax @ $2.66/sf; 2007 Ops @ $5.77/sf, 2011 Est Ops @ $2.57/sf		



1502 Broadway St

Bixby Apartments

Santa Monica, CA 90404

Los Angeles County

Building Type:	Class B Multi-Family/Apartments	Space Avail:	553 SF
Status:	Built Jan 2012	Max Contig:	553 SF
Building Size:	29,064 SF	Smallest Space:	553 SF
Land Area:	14,810 SF	Rent/SF/YR:	$6.00
Stories:	3	% Leased:	0%
Expenses:	2020 Tax @ $4163.36/Unit; 2011 Ops @ $2422.37/Unit		
Parking:	32 Covered Spaces are available; Ratio of 2.00/1,000 SF		

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1601-1641 Lincoln

Catherine I, II, & Junction

Santa Monica, CA 90404

Los Angeles County

Building Type: Retail/(Strip Ctr)
Status: Built 2022
Building Size: 27,527 SF
Land Area: -
Stories: 4

Space Avail: 26,922 SF
Max Contig: 26,922 SF
Smallest Space: 1,009 SF
Rent/SF/YR: $6.00
% Leased: 2.2%



1550 Lincoln Blvd

NMS Lincoln

Santa Monica, CA 90401

Los Angeles County

Building Type: Class A Multi-Family/Apartments
Status: Under Construction, delivers Dec 2022
Building Size: 102,500 SF
Land Area: -
Stories: 5
Expenses: 2020 Tax @ $3103.31/Unit
Parking: 232 Covered Spaces are available; Ratio of 2.26/1,000 SF

Space Avail: 11,520 SF
Max Contig: 6,617 SF
Smallest Space: 1,308 SF
Rent/SF/YR: $5.50-$6.75
% Leased: 0%



1600 Lincoln Blvd

Santa Monica, CA 90404

Los Angeles County

Building Type: Retail
Status: Built 1938, Renov Aug 2022
Building Size: 10,606 SF
Land Area: 33,106 SF
Stories: 1
Expenses: 2020 Tax @ $2.51/sf
Parking: 10 Surface Spaces are available; Ratio of 0.94/1,000 SF

Space Avail: 10,606 SF
Max Contig: 5,605 SF
Smallest Space: 5,001 SF
Rent/SF/YR: Withheld
% Leased: 0%



2700 Lincoln Blvd

Santa Monica, CA 90405

Los Angeles County

Building Type: Retail/Auto Repair
Status: Built 1969
Building Size: 9,828 SF
Land Area: 26,998 SF
Stories: 1
Expenses: 2021 Tax @ $3.60/sf

Space Avail: 9,828 SF
Max Contig: 9,828 SF
Smallest Space: 9,828 SF
Rent/SF/YR: $7.65
% Leased: 100%

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2817-2827 Main St

Santa Monica, CA 90405

Los Angeles County

Building Type:	Class C Office	Space Avail:	3,500 SF
Status:	Built 1923	Max Contig:	2,500 SF
Building Size:	13,500 SF	Smallest Space:	1,000 SF
Typical Floor Size:	3,000 SF	Rent/SF/YR:	Withheld
Stories:	2	% Leased:	81.5%
Expenses:	2021 Tax @ $3.44/sf		
Parking:	20 Surface Spaces are available; 12 Reserved Spaces @ $65.00/mo; Ratio of 10.67/1,000 SF		



2907-2915 Main St

Santa Monica, CA 90405

Los Angeles County

Building Type:	Retail/Storefront	Space Avail:	1,200 SF
Status:	Built 1923, Renov 1989	Max Contig:	1,200 SF
Building Size:	10,000 SF	Smallest Space:	1,200 SF
Land Area:	10,019 SF	Rent/SF/YR:	$7.00
Stories:	1	% Leased:	100%
Expenses:	2020 Tax @ $3.44/sf; 2007 Combined Est Tax/Ops @ $15.92/sf		
Parking:	Ratio of 0.00/1,000 SF		



2910 1/2 Main St

Santa Monica, CA 90405

Los Angeles County

Building Type:	Retail/Storefront	Space Avail:	950 SF
Status:	Built 1913	Max Contig:	950 SF
Building Size:	1,916 SF	Smallest Space:	950 SF
Land Area:	958 SF	Rent/SF/YR:	$6.84
Stories:	2	% Leased:	100%
Expenses:	2020 Tax @ $2.33/sf		
Parking:	3 Surface Spaces are available; Ratio of 1.56/1,000 SF		



3002 Main St

Santa Monica, CA 90405

Los Angeles County

SWC Main St. & Pier Ave.

Building Type:	Class B Office/Loft/Creative Space	Space Avail:	5,018 SF
Status:	Built 2001	Max Contig:	5,018 SF
Building Size:	5,018 SF	Smallest Space:	5,018 SF
Typical Floor Size:	5,018 SF	Rent/SF/YR:	$6.25
Stories:	1	% Leased:	0%
Expenses:	2021 Tax @ $16.11/sf		
Parking:	10 Surface Spaces are available; Ratio of 1.99/1,000 SF		

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1007-1015 Montana Ave

Santa Monica, CA 90403

Los Angeles County

Building Type: Retail/Storefront
Status: Built 1928
Building Size: 5,400 SF
Land Area: 9,583 SF
Stories: 1
Expenses: 2021 Tax @ $10.66/sf
Parking: 2 Surface Spaces are available; Ratio of 1.27/1,000 SF

Space Avail: 1,570 SF
Max Contig: 1,570 SF
Smallest Space: 1,570 SF
Rent/SF/YR: $7.95
% Leased: 100%



1028-1034 Montana Ave

Santa Monica, CA 90403

Los Angeles County

Building Type: Retail/Storefront
Status: Built 1954
Building Size: 4,118 SF
Land Area: 7,405 SF
Stories: 1
Expenses: 2020 Tax @ $20.24/sf
Parking: Ratio of 0.00/1,000 SF

Space Avail: 3,000 SF
Max Contig: 2,300 SF
Smallest Space: 700 SF
Rent/SF/YR: $6.42
% Leased: 83.0%



1102-1110 Montana Ave

Santa Monica, CA 90403

Los Angeles County

Building Type: Retail/Storefront
Status: Built 1964
Building Size: 7,784 SF
Land Area: 7,802 SF
Stories: 1
Expenses: 2020 Tax @ $1.96/sf
Parking: Ratio of 3.01/1,000 SF

Space Avail: 1,200 SF
Max Contig: 1,200 SF
Smallest Space: 1,200 SF
Rent/SF/YR: Withheld
% Leased: 100%



1229-1235 Montana Ave

Santa Monica, CA 90403

Los Angeles County

Building Type: Retail/Storefront
Status: Built 1986
Building Size: 3,940 SF
Land Area: 5,227 SF
Stories: 2
Expenses: 2020 Tax @ $3.39/sf
Parking: 5 free Surface Spaces are available; Ratio of 1.27/1,000 SF

Space Avail: 800 SF
Max Contig: 800 SF
Smallest Space: 800 SF
Rent/SF/YR: $8.00
% Leased: 79.7%

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1511 Montana Ave

Santa Monica, CA 90403

Los Angeles County

Building Type: Retail/Storefront
Status: Built 1956
Building Size: 3,337 SF
Land Area: 4,792 SF
Stories: 1
Expenses: 2020 Tax @ $7.48/sf; 2010 Ops @ $2.88/sf
Parking: 4 Surface Spaces are available; Ratio of 1.20/1,000 SF

Space Avail: 2,355 SF
Max Contig: 1,215 SF
Smallest Space: 1,140 SF
Rent/SF/YR: $7.95
% Leased: 100%



1447 Ocean Ave

Ocean View Hotel

SANTA MONICA, CA 90401

Los Angeles County

Building Type: Hospitality/Hotel
Status: Built 1963
Building Size: 30,745 SF
Land Area: 14,810 SF
Stories: 4
Expenses: 2020 Tax @ $3.37/sf

Space Avail: 740 SF
Max Contig: 740 SF
Smallest Space: 740 SF
Rent/SF/YR: $10.00
% Leased: 0%



11640-11648 San Vicente Blvd

Topa Town & Country

Los Angeles, CA 90049

Los Angeles County

Building Type: Retail/Storefront (Neighborhood Ctr)
Status: Built 1977
Building Size: 60,204 SF
Land Area: 86,249 SF
Stories: 2
Expenses: 2021 Tax @ $2.03/sf; 2010 Ops @ $3.28/sf
Parking: 93 Surface Spaces @ $135.00/mo; Ratio of 2.71/1,000 SF

Space Avail: 4,549 SF
Max Contig: 3,098 SF
Smallest Space: 1,451 SF
Rent/SF/YR: $7.00
% Leased: 100%



11706-11712 San Vicente Blvd

Los Angeles, CA 90049

Los Angeles County

Building Type: Retail/Storefront
Status: Built 1964
Building Size: 7,027 SF
Land Area: 12,197 SF
Stories: 1
Expenses: 2021 Tax @ $6.50/sf; 2007 Ops @ $10.58/sf
Parking: 4 Surface Spaces are available; Ratio of 0.51/1,000 SF

Space Avail: 1,850 SF
Max Contig: 1,850 SF
Smallest Space: 1,850 SF
Rent/SF/YR: $6.00
% Leased: 100%

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11757-11759 San Vicente Blvd

Los Angeles, CA 90049

Los Angeles County

Building Type:	Retail/Storefront Retail/Office	Space Avail:	3,349 SF
Status:	Built 1950, Renov Mar 2019	Max Contig:	2,250 SF
Building Size:	8,260 SF	Smallest Space:	1,099 SF
Land Area:	13,068 SF	Rent/SF/YR:	$6.25-$6.50
Stories:	2	% Leased:	59.5%
Expenses:	2020 Tax @ $16.50/sf; 2020 Ops @ $4.56/sf		
Parking:	16 Surface Spaces @ $250.00/mo; Ratio of 2.00/1,000 SF		



310-312 Wilshire Blvd

Santa Monica, CA 90401

Los Angeles County

Building Type:	Class C Office/Loft/Creative Space	Space Avail:	9,177 SF
Status:	Built 1928	Max Contig:	4,723 SF
Building Size:	9,177 SF	Smallest Space:	4,454 SF
Typical Floor Size:	4,454 SF	Rent/SF/YR:	$4.50
Stories:	2	% Leased:	0%
Expenses:	2021 Tax @ $8.71/sf, 2013 Est Tax @ $11.70/sf; 2013 Est Ops @ $0.24/sf		



319-335 Wilshire Blvd

Santa Monica, CA 90401

Los Angeles County

N/W/C

Building Type:	Retail	Space Avail:	2,526 SF
Status:	Built 1970, Renov Dec 1998	Max Contig:	2,526 SF
Building Size:	23,006 SF	Smallest Space:	2,526 SF
Land Area:	14,810 SF	Rent/SF/YR:	$6.00
Stories:	2	% Leased:	89.0%
Expenses:	2021 Tax @ $5.34/sf		
Parking:	4 Surface Spaces are available; Ratio of 0.17/1,000 SF		



631 Wilshire Blvd

Santa Monica, CA 90401

Los Angeles County

N/W/C of 7th & Wilshire

Building Type:	Class B Office/Office Live/Work Unit	Space Avail:	15,473 SF
Status:	Built 1958, Renov Nov 1997	Max Contig:	5,283 SF
Building Size:	28,667 SF	Smallest Space:	2,414 SF
Typical Floor Size:	7,166 SF	Rent/SF/YR:	$7.50
Stories:	4	% Leased:	63.8%
Expenses:	2021 Tax @ $14.85/sf		
Parking:	73 Surface Spaces @ $250.00/mo; Ratio of 2.50/1,000 SF		

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720 Wilshire Blvd

Santa Monica, CA 90401

Los Angeles County

Corner of Lincoln and Wilshire

Building Type: Class B Office
Status: Built 1986, Renov 2008
Building Size: 26,260 SF
Typical Floor Size: 8,596 SF
Stories: 3
Expenses: 2021 Tax @ $4.85/sf; 2000 Est Ops @ $6.72/sf
Parking: Reserved Spaces @ $155.00/mo; Covered Spaces @ $135.00/mo; 20 Surface Spaces are available; Ratio of 4.00/1,000 SF

Space Avail: 9,873 SF
Max Contig: 5,707 SF
Smallest Space: 1,116 SF
Rent/SF/YR: $4.50-$5.75
% Leased: 62.4%



1018 Wilshire Blvd

Santa Monica, CA 90401

Los Angeles County

Building Type: Retail/Restaurant
Status: Built 2006
Building Size: 2,192 SF
Land Area: -
Stories: 1
Expenses: 2020 Tax @ $10.96/sf

Space Avail: 2,192 SF
Max Contig: 2,192 SF
Smallest Space: 2,192 SF
Rent/SF/YR: $7.00
% Leased: 0%



2300 Wilshire Blvd

2300 Wilshire

Santa Monica, CA 90403

Los Angeles County

Building Type: Class A Multi-Family/Apartments
Status: Built 2019
Building Size: 60,184 SF
Land Area: -
Stories: 3
Expenses: 2015 Tax @ $595.10/Unit
Parking: 117 Covered Spaces are available; Ratio of 1.94/1,000 SF

Space Avail: 2,200 SF
Max Contig: 2,200 SF
Smallest Space: 2,200 SF
Rent/SF/YR: $6.50
% Leased: 0%



3001 Wilshire Blvd

Stanford Court

Santa Monica, CA 90403

Los Angeles County

Building Type: Retail/Freestanding (Strip Ctr)
Status: Built 1978
Building Size: 13,000 SF
Land Area: 25,526 SF
Stories: 2
Expenses: 2020 Tax @ $2.62/sf

Space Avail: 5,408 SF
Max Contig: 3,446 SF
Smallest Space: 1,962 SF
Rent/SF/YR: $5.00-$7.00
% Leased: 58.4%

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3032 Wilshire Blvd

Santa Monica, CA 90403

Los Angeles County

Building Type:	Retail/Storefront	Space Avail:	6,470 SF
Status:	Built 2020	Max Contig:	5,430 SF
Building Size:	12,083 SF	Smallest Space:	465 SF
Land Area:	29,621 SF	Rent/SF/YR:	$12.13-$12.90
Stories:	2	% Leased:	46.5%
Expenses:	2017 Tax @ $6.92/sf		
Parking:	59 Surface Spaces are available; Ratio of 4.88/1,000 SF		



11755 Wilshire Blvd

Wilshire Landmark I

Los Angeles, CA 90025

Los Angeles County

NEC of Wilshire Blvd & Granville Av

Building Type:	Class A Office	Space Avail:	119,587 SF
Status:	Built 1986	Max Contig:	37,445 SF
Building Size:	358,478 SF	Smallest Space:	100 SF
Typical Floor Size:	17,500 SF	Rent/SF/YR:	$5.10-$5.70
Stories:	24	% Leased:	72.1%
Expenses:	2021 Tax @ $3.47/sf		
Parking:	Covered Spaces @ $230.00/mo; Reserved Spaces @ $360.00/mo; Covered Tandem Spaces @ $280.00/mo; Ratio of 0.00/1,000 SF		

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1 218 Hill St — SOLD

Santa Monica, CA 90405

Recorded Buyer **218 Hill Street LLC**
218 Hill St
Santa Monica, CA 90405

True Buyer **Daniel Galdjie**
12400 Wilshire Blvd
Los Angeles, CA 90025
(310) 266-2874 (p)

Los Angeles

Recorded Seller **Big N Properties LLC**
111 Broadway
Oakland, CA 94607

True Seller **Sullivan Management**
111 Broadway
Oakland, CA 94607
(510) 225-9161 (p)



Sale Date **Jul 13, 2021**
Sale Price **$1,625,000**
Price/SF Land **$326**

Parcels **4288-003-047**
Comp ID **5581692**
Comp Status **Research Complete**

Type **2 Star Land**
Land Acres **0.11 AC**
Land SF **4,989 SF**
Zoning **SMOP2***

2 218 Hill St — SOLD

Santa Monica, CA 90405

Recorded Buyer **Big N Properties LLC**
111 Broadway
Oakland, CA 94607

True Buyer **Sullivan Management**
111 Broadway
Oakland, CA 94607
(510) 225-9161 (p)

Los Angeles

Recorded Seller **Wilbur Trust**
218 Hill St
Santa Monica, CA 90405
(210) 994-5479 (p)

True Seller **Wilbur Trust**
218 Hill St
Santa Monica, CA 90405
(210) 994-5479 (p)



Sale Date **Oct 15, 2020**
Sale Price **$1,698,564**
Price/SF Land **$338**

Parcels **4288-003-047**
Comp ID **5264952**
Comp Status **Research Complete**

Type **2 Star Land**
Land Acres **0.11 AC**
Land SF **4,989 SF**
Zoning **SMOP2***
Sale Condition **Redevelopment Project**

3 2133 Pontius Ave — SOLD

Los Angeles, CA 90025

Recorded Buyer **2133 & 2143 Pontius LLC**
1800 Century Park E
Los Angeles, CA 90067

True Buyer **Dean Factor**
532 Spoleto Dr
Pacific Palisades, CA 90272
(310) 613-1866 (p)

Los Angeles

Recorded Seller **Bruno & Ursula Heidenwag Family Trus...**
27363 6 Eastvale Rd
Palos Verdes Peninsula, CA 90274
(310) 544-0784 (p)

True Seller **Bruno & Ursula Heidenwag Family Trus...**
27363 6 Eastvale Rd
Palos Verdes Peninsula, CA 90274
(310) 544-0784 (p)



Thomas Bros. Guide 635-b6

Sale Date **May 5, 2020**
Sale Price **$1,855,765**
Price/SF Land **$281**

Parcels **4322-025-019**
Comp ID **5122658**
Comp Status **Research Complete**

Type **2 Star Land**
Land Acres **0.15 AC**
Land SF **6,599 SF**
Zoning **LAM2**

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4 2247 Barry Ave — SOLD

Los Angeles, CA 90064

Recorded Buyer **2236 Barrington SPDC No 1 LLC**
30 S Lake Ave
Pasadena, CA 91101

Recorded Buyer **2236 Barrington SPDC No. 2 LLC**
30 S Lake Ave
Pasadena, CA 91101

True Buyer **System Property Development Company**
14724 Ventura Blvd
Sherman Oaks, CA 91403
(213) 687-7275 (p)

Los Angeles

Recorded Seller **2236 Barrington LLC**
1801 Century Park E
Los Angeles, CA 90067

Recorded Seller **2240 Barry LLC**
1801 Century Park East Blvd
Los Angeles, CA 90067

True Seller **HQ Entertainment Services, Inc.**
1801 Avenue of the Stars
Los Angeles, CA 90067
(310) 280-2830 (p)



Sale Date	**Jan 16, 2019**
Sale Price	**$1,572,574**
Price/SF Land	**$262**
Actual Cap Rate	**5.00%**
Parcels	**4260-013-011**
Comp ID	**4655179**
Comp Status	**Research Complete**

Type	**3 Star Land**
Land Acres	**0.14 AC**
Land SF	**6,004 SF**
Zoning	**LAM2**
Sale Condition	**1031 Exchange**

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1 825 Hampton Dr — SOLD

Venice, CA 90291

Recorded Buyer **SJF Venice LLC**
11440 San Vicente Blvd
Los Angeles, CA 90049

True Buyer **Westwood Financial**
11440 San Vicente Blvd
Los Angeles, CA 90049
(310) 820-5443 (p)

Los Angeles

Recorded Seller **825 Hampton LLC**
825 Hampton Dr
Venice, CA 90291

True Seller **Lori Michelle Chevalier**
3125 Ocean Blvd
Long Beach, CA 90803
(562) 439-0107 (p)



Sale Date **Jul 5, 2022**
Sale Price **$15,000,000**
Price/SF **$1,764.71**

Parcels **4286-012-039**
Comp ID **6081806**
Comp Status **Research Complete**

Type **2 Star Office**
Year Built **1927**
RBA **8,500 SF**
Land Acres **0.42 AC**
Land SF **18,295 SF**
Zoning **LAC2**
Sale Condition **Redevelopment Project**

2 6409 W Sunset Blvd - Jack-in-the-Box — SOLD

Los Angeles, CA 90028

Recorded Buyer **KBS Holdco LLC**
8820 W Sunset Blvd
West Hollywood, CA 90069

True Buyer **Regency Outdoor Advertising Inc**
8820 Sunset Blvd
West Hollywood, CA 90069
(310) 657-8883 (p)

Los Angeles

Recorded Seller **6409 Sunset LLC**

True Seller **R.D. Olson Construction**
400 Spectrum Center Dr
Irvine, CA 92618
(949) 474-2001 (p)



Sale Date **Apr 12, 2022**
Sale Price **$23,000,000**
Price/SF **$5,924.78**

Parcels **5546-012-011**
Comp ID **5961584**
Comp Status **Research Complete**

Type **3 Star Retail Fast Food**
Year Built **1987**
GLA **3,882 SF**
Land Acres **0.54 AC**
Land SF **23,605 SF**
Zoning **LAC4**
Sale Condition **Redevelopment Project**

3 400-430 S San Vicente Blvd - Beverly Plaza — SOLD

Los Angeles, CA 90048

Recorded Buyer **400 S San Vicente LLC**
501 NW Grand Blvd
Oklahoma City, OK 73118

True Buyer **The Abraham Companies**
900 Cercis Pl
Newport Beach, CA 92660
(949) 500-6772 (p)

True Buyer **Oklahoma Rock Holdings**

Los Angeles

Recorded Seller **YVF Investment Corp.**
10851 Wilkins Ave
Los Angeles, CA 90024

True Seller **Farshad Samadi**
215 N Bowling Green Way
Los Angeles, CA 90049
(310) 470-4015 (p)



Thomas Bros. Guide

Sale Date **Mar 22, 2022**
Sale Price **$26,000,000**
Price/SF **$1,509.17**

Parcels **5511-044-038**
Comp ID **5939247**
Comp Status **Research Complete**

Type **3 Star Retail Storefront (Strip Center)**
Year Built **1986**
GLA **17,228 SF**
Land Acres **0.65 AC**
Land SF **28,497 SF**
Zoning **LAC2**
Sale Condition **Redevelopment Project**

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4 9021 W Sunset Blvd — SOLD

West Hollywood, CA 90069

Recorded Buyer **KBS Holdco LLC**
8820 W Sunset Blvd
West Hollywood, CA 90069

True Buyer **Regency Outdoor Advertising Inc**
8820 Sunset Blvd
West Hollywood, CA 90069
(310) 657-8883 (p)

Los Angeles

Recorded Seller **Bank Of America NA**
101 N Tryon St
Charlotte, NC 28202

True Seller **Bank of America Corporation**
100 N Tryon St
Charlotte, NC 28202
(980) 335-3561 (p)



Thomas Bros. Guide 592-H6

Sale Date **Mar 11, 2022**
Sale Price **$24,000,000**
Price/SF **$2,557.27**

Parcels **5560-029-023, 5560-029-024**
Comp ID **5923954**
Comp Status **Research Complete**

Type **2 Star Retail Bank**
Year Built **1955**
GLA **9,385 SF**
Land Acres **0.35 AC**
Land SF **15,237 SF**
Zoning **SSP**
Sale Condition **Redevelopment Project**

5 1430 Lincoln Blvd — SOLD

Santa Monica, CA 90401

Recorded Buyer **501 Broadway Owner LLC**
2120 Colorado Blvd
Santa Monica, CA 90404

Recorded Buyer **1325 6th Street Owner LLC**
2120 Colorado Ave
Santa Monica, CA 90404

Recorded Buyer **1318 Lincoln Blvd Owner LLC**
2120 Colorado Blvd
Santa Monica, CA 90404

Recorded Buyer **1650 Lincoln Blvd Owner LLC**
2120 Colorado Blvd
Santa Monica, CA 90404

Recorded Buyer **1338 5th Street Owner LLC**
2120 Colorado Blvd
Santa Monica, CA 90404

True Buyer **Tishman Speyer**
2120 Colorado Ave
Santa Monica, CA 90404
(213) 443-5030 (p)

Los Angeles

Recorded Seller **WSC 501 Broadway LLC**
501 Broadway
Santa Monica, CA 90401

Recorded Seller **1313 6th Street LLC**
10960 Wilshire Blvd
Los Angeles, CA 90024

Recorded Seller **WSC 1318 Lincoln Blvd LLC**
1430 5th St
Santa Monica, CA 90401

Recorded Seller **1650 Lincoln NMS LLC**
10960 Wilshire Blvd
Los Angeles, CA 90024

Recorded Seller **1338 5th Street LLC**
10960 Wilshire Blvd
Los Angeles, CA 90024

True Seller **WSC Communities**
1430 5th St
Santa Monica, CA 90401
(424) 286-9977 (p)



Sale Date **Jan 4, 2022**
Sale Price **$33,699,000**
Price/SF Land **$1,121**

Parcels **4291-021-006, 4291-021-007, 4291-021-008**
Comp ID **5826984**
Comp Status **Research Complete**

Type **Land**
Land Acres **0.69 AC**
Land SF **30,056 SF**
Zoning **SMC4***
Sale Condition **Bulk/Portfolio Sale**

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6 8501 Beverly Blvd - (Leased Fee) SOLD

Los Angeles, CA 90048

True Buyer **Abady Holdings Corporation**
335-345 N Maple Dr
Beverly Hills, CA 90210
(310) 601-2648 (p)

Los Angeles

Recorded Seller **Marica Schwartz Family Trust 9/15/04**
150 S Doheny Dr
Beverly Hills, CA 90211

Recorded Seller **JMM LLC**
150 S Doheny Dr
Beverly Hills, CA 90211

True Seller **Budget Rent-A-Car of Southern Califo...**
150 Doheny Dr
Beverly Hills, CA 90211
(310) 278-1021 (p)


Thomas Bros. Guide 632-J1

Sale Date **Oct 14, 2021**
Sale Price **$55,500,000**
Price/SF Land **$891**

Parcels **4337-012-064, 4337-012-065**
Comp ID **5722167**
Comp Status **Research Complete**

Type **Land**
Land Acres **1.43 AC**
Land SF **62,291 SF**
Zoning **C2**
Sale Condition **Ground Lease (Leased Fee)**

7 1000 N Highland Ave SOLD

Los Angeles, CA 90038

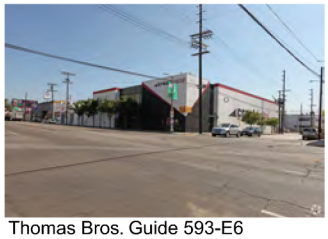
Recorded Buyer **1000 Highland Owner LLC**
2341 Michigan Ave
Santa Monica, CA 90404

True Buyer **Redcar Properties LTD**
2341 Michigan Ave
Santa Monica, CA 90404
(310) 880-3363 (p)

Los Angeles

Recorded Seller **Joel J Chen & Margaret Y Chen Lifeti...**
941 N Highland Ave
Los Angeles, CA 90038
(323) 466-9700 (p)

True Seller **Joel J Chen & Margaret Y Chen Lifeti...**
941 N Highland Ave
Los Angeles, CA 90038
(323) 466-9700 (p)


Thomas Bros. Guide 593-E6

Sale Date **Sep 24, 2021**
Sale Price **$31,500,000**
Price/SF **$1,079.14**

Parcels **5532-027-004, 5532-027-014**
Comp ID **5700784**
Comp Status **Research Complete**

Type **2 Star Office**
Year Built **1962**
RBA **29,190 SF**
Land Acres **0.83 AC**
Land SF **36,273 SF**
Zoning **M2-2**
Sale Condition **Redevelopment Project**

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8 | 1630-1634 Euclid St — SOLD

Santa Monica, CA 90404

Recorded Buyer **1650 Euclid Owner LLC**
2341 Michigan Ave
Santa Monica, CA 90404

True Buyer **Redcar Properties LTD**
2341 Michigan Ave
Santa Monica, CA 90404
(310) 880-3363 (p)

Los Angeles

Recorded Seller **1630 Euclid Street LLC**
1508 17th St
Santa Monica, CA 90404

Recorded Seller **Chrispect Estates LLC**
1630 Euclid St
Santa Monica, CA 90404

Recorded Seller **1620 Euclid LLC**
1508 17th St
Santa Monica, CA 90404

True Seller **David Wilson**
919 20th St
Santa Monica, CA 90403
(310) 451-7123 (p)

True Seller **Jean Christophe Beck**
11100 Santa Monica Blvd
Los Angeles, CA 90025
(818) 380-1918 (p)



Thomas Bros. Guide 671-F2

Sale Date	**Jul 19, 2021**
Sale Price	**$15,000,000**
Price/SF	**$1,730.10**
Pro Forma Cap	**5.00%**
Parcels	**4283-007-009, 4283-007-010**
Comp ID	**5625362**
Comp Status	**Research Complete**

Type	**2 Star Industrial Service**
Year Built	**1956**
RBA	**7,250 SF**
Land Acres	**0.34 AC**
Land SF	**15,024 SF**
Zoning	**M2, Santa Monica**
Sale Condition	**Redevelopment Project**

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9 415 N Crescent Dr — SOLD

Beverly Hills, CA 90210

Recorded Buyer **415 N Crescent Llc**
15840 Ventura
Encino, CA 91436

True Buyer **KHP Enterprises**
15840 Ventura Blvd
Encino, CA 91436
(818) 906-7800 (p)

Los Angeles

Recorded Seller **505 Investment Company LLC**
9300 Wilshire Blvd
Beverly Hills, CA 90212

Recorded Seller **ED Flores LLC**

Recorded Seller **9300 Wilshire LLC**

True Seller **Dromy International Investment Corpo...**
9744 Wilshire Blvd
Beverly Hills, CA 90212
(310) 208-4100 (p)

True Seller **SLH Investments**
13700 Marina Pointe Dr
Marina Del Rey, CA 90292
(818) 425-9776 (p)



Sale Date **Jun 18, 2021**
Sale Price **$18,750,000**
Price/SF Land **$1,228**

Parcels **4343-008-014**
Comp ID **5565777**
Comp Status **Research Complete**

Type **2 Star Land**
Land Acres **0.35 AC**
Land SF **15,263 SF**
Zoning **BHC3BY**

10 8829 National Blvd — SOLD

Culver City, CA 90232

Recorded Buyer **Culver Crossings Properties LP**

True Buyer **Apple Inc.**
1 Apple Park Way
Cupertino, CA 95014
(408) 996-1010 (p)

Los Angeles

Recorded Seller **Venice Pacific Investments LP**
8771 Washington Blvd
Culver City, CA 90232

True Seller **William D. Feldman Associates**
12540 Beatrice St
Los Angeles, CA 90066
(310) 339-4986 (p)



Sale Date **Nov 13, 2020**
Sale Price **$42,006,113**
Price/SF **$1,220.01**

Parcels **4312-015-005**
Comp ID **5297150**
Comp Status **Research Complete**

Type **3 Star Self-Storage**
Year Built **1952**
GBA **34,495 SF**
Land Acres **0.85 AC**
Land SF **36,917 SF**
Zoning **LACM**
Sale Condition **Bulk/Portfolio Sale, Redevelopment Project, Recapitalization**

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11 8833 National Blvd — SOLD

Culver City, CA 90232

Recorded Buyer **Culver Crossings Properties LP**

True Buyer **Apple Inc.**
1 Apple Park Way
Cupertino, CA 95014
(408) 996-1010 (p)

Los Angeles

Recorded Seller **Venice Pacific Investments LP**
8771 Washington Blvd
Culver City, CA 90232

True Seller **William D. Feldman Associates**
12540 Beatrice St
Los Angeles, CA 90066
(310) 339-4986 (p)



Sale Date	**Nov 13, 2020**
Sale Price	**$59,039,692**
Price/SF	**$1,220.01**
Parcels	**4312-015-005**
Comp ID	**5297150**
Comp Status	**Research Complete**
Type	**2 Star Industrial Warehouse**
Year Built	**1952**
RBA	**43,647 SF**
Land Acres	**1.07 AC**
Land SF	**46,714 SF**
Zoning	**LACM**
Sale Condition	**Bulk/Portfolio Sale, Redevelopment Project, Recapitalization**

12 8876-8888 Venice Blvd — SOLD

Culver City, CA 90232

Recorded Buyer **Culver Crossings Properties LP**

True Buyer **Apple Inc.**
1 Apple Park Way
Cupertino, CA 95014
(408) 996-1010 (p)

Los Angeles

Recorded Seller **Venice Pacific Investments LP**
8771 Washington Blvd
Culver City, CA 90232

True Seller **William D. Feldman Associates**
12540 Beatrice St
Los Angeles, CA 90066
(310) 339-4986 (p)



Sale Date	**Nov 13, 2020**
Sale Price	**$39,206,850**
Price/SF	**$1,220.01**
Parcels	**4312-015-005**
Comp ID	**5297150**
Comp Status	**Research Complete**
Type	**3 Star Retail Storefront Retail/Office**
Year Built	**1952**
GLA	**36,944 SF**
Land Acres	**0.91 AC**
Land SF	**39,539 SF**
Zoning	**LACM**
Sale Condition	**Bulk/Portfolio Sale, Redevelopment Project, Recapitalization**

13 9176 W Sunset Blvd — SOLD

West Hollywood, CA 90069

Recorded Buyer **LDRL CA 306 LLC**

True Buyer **The John Buck Company**
151 N Franklin St
Chicago, IL 60606
(312) 993-9800 (p)

Los Angeles

Recorded Seller **John H Hornburg**
9174 W Sunset Blvd
West Hollywood, CA 90069
(310) 476-9403 (p)

True Seller **John H Hornburg**
9174 W Sunset Blvd
West Hollywood, CA 90069
(310) 476-9403 (p)



Sale Date	**Dec 3, 2019**
Sale Price	**$29,150,000**
Price/SF	**$2,492.52**
Parcels	**4340-028-001, 4340-028-002, 4340-028-010**
Comp ID	**4975156**
Comp Status	**Research Complete**
Type	**4 Star Retail Auto Dealership**
Year Built	**1929**
GLA	**11,695 SF**
Land Acres	**0.42 AC**
Land SF	**18,165 SF**
Zoning	**WDC2A***
Sale Condition	**Redevelopment Project**

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14 8844 Burton Way - 8844 Burton Way — SOLD

Beverly Hills, CA 90211

Recorded Buyer **8844 Burton Way LLC**
2200 Biscayne Blvd
Miami, FL 33137

True Buyer **Crescent Heights**
2200 Biscayne Blvd
Miami, FL 33137
(305) 374-5700 (p)

Los Angeles

Recorded Seller **Emanuel Center Inc.**
8844 Burton Way
Beverly Hills, CA 90211

True Seller **Temple Emanuel of Beverly Hills**
8844 Burton Way
Beverly Hills, CA 90211
(310) 288-3737 (p)



Thomas Bros. Guide 632-H1

Sale Date **Jun 21, 2019**
Sale Price **$27,400,000**
Price/SF Land **$1,023**

Parcels **4335-020-009**
Comp ID **4797202**
Comp Status **Research Complete**

Type **2 Star Land**
Land Acres **0.61 AC**
Land SF **26,779 SF**
Zoning **BHR4YY**

15 9300 Wilshire Blvd - Wilshire-Rexford Center (Leased Fee) — SOLD

Beverly Hills, CA 90210

Recorded Buyer **9300 Wilshire Fee LLC**
9300 Wilshire Blvd
Beverly Hills, CA 90212

True Buyer **Dromy International Investment Corpo...**
9744 Wilshire Blvd
Beverly Hills, CA 90212
(310) 208-4100 (p)

True Buyer **SLH Investments**
13700 Marina Pointe Dr
Marina Del Rey, CA 90292
(818) 425-9776 (p)

Los Angeles

Recorded Seller **Wescot B. Stone III Living Trust 1/9...**
2820 Via de la Guerra
Palos Verdes Estates, CA 90274
(310) 947-1103 (p)

True Seller **Wescot B. Stone III Living Trust 1/9...**
2820 Via de la Guerra
Palos Verdes Estates, CA 90274
(310) 947-1103 (p)



Sale Date **Apr 15, 2019**
Sale Price **$25,150,000**
Price/SF Land **$1,532**

Parcels **4331-013-044**
Comp ID **4746293**
Comp Status **Research Complete**

Type **2 Star Land**
Land Acres **0.38 AC**
Land SF **16,552 SF**
Zoning **BHR1YY**
Sale Condition **Ground Lease (Leased Fee), Exercise of Option**

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16 | 1733 Ocean Ave - 4 Story Office Building Site (leased Fee) | SOLD

Santa Monica, CA 90401

Recorded Buyer **Ocean Avenue Santa Monica Realty LLC**
200 West St
New York, NY 10282

True Buyer **Goldman Sachs-Merchant Banking Real ...**
2001 Ross Ave
Dallas, TX 75201
(972) 368-2200 (p)

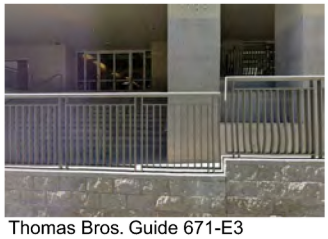
Los Angeles

Recorded Seller **1733 Ocean Avenue IV Properties LLC**
450 N Roxbury Dr
Beverly Hills, CA 90210

Recorded Seller **1733 Ocean Avenue Properties II LLC**
450 N Roxbury Dr
Beverly Hills, CA 90210

Recorded Seller **1733 Ocean Avenue Properties IV LLC**
450 N Roxbury Dr
Beverly Hills, CA 90210

True Seller **Starpoint Properties LLC**
433 N Camden Dr
Beverly Hills, CA 90210
(310) 247-0550 (p)



Thomas Bros. Guide 671-E3

Sale Date **Mar 1, 2019**
Sale Price **$65,000,000**
Price/SF Land **$1,901**
Actual Cap Rate **2.50%**

Parcels **4290-015-033**
Comp ID **4695934**
Comp Status **Research Complete**

Type **2 Star Land**
Land Acres **0.79 AC**
Land SF **34,195 SF**
Zoning **CA, Santa Monica**
Sale Condition **Ground Lease (Leased Fee), Investment Triple Net**

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MARSHALL VALUATION SERVICE COST SCHEDULE

Primary Building Type:	Office	Height per Story:	12'
Effective Age:	0 YRS	Number of Buildings:	1
Condition:		Gross Building Area:	10,000 SF

MVS Sec/Page		15/17
Quality/Bldg. Class		excellent/C
Building Component		3-Story Office Bldg
Component Sq. Ft.		10,000 SF
Base Square Foot Cost		$290.00
Square Foot Refinements		
Heating and Cooling		$14.30
Sprinklers		$4.89
Subtotal		$309.19
Height and Size Refinements		
Number of Stories Multiplier		1.000
Height per Story Multiplier		1.000
Floor Area Multiplier		1.000
Subtotal		$309.19
Cost Multipliers		
Current Cost Multiplier		1.11
Local Multiplier		1.18
Final Square Foot Cost		$404.98
Base Component Cost		$4,049,771
Base Building Cost	*(via Marshall Valuation Service cost data)*	$4,049,771
Additions		
Signage, Landscaping & Misc. Site Improvements (not included above)		
Parking/Walks (not included above)		
Other		$0
Direct Building Cost		$4,049,771
Indirect Costs	0.0% of Direct Building Cost	$0
Direct and Indirect Building Cost		$4,049,771
Rounded		$4,050,000
Direct and Indirect Building Cost Per Square Foot		**$405**

Compiled by CBRE

ATTACHMENT H

Hill International

Hill International (Arizona) Inc.
2231 East Camelback Road
Suite 102
Phoenix, AZ 85016
Tel : 602-778-9888
www.hillintl.com
AZ Contractor's License Number
ROC 289497

June 27, 2024

Ms. Gina M. Angiolillo
Senior Associate
Alston & Bird
333 South Hope Street
Los Angeles, CA 90071

Subject: Barry Building – Opinion of Probable Cost

Dear Ms. Angiolillo,

I hope this letter finds you well. I am writing in response to your follow-up regarding the Barry Building project. We appreciate the opportunity to provide further insights to support your submission to the Cultural Heritage Commission. Below, I address the specific points you raised concerning the opinion of probable costs, based on current market conditions from our original analysis performed in November 2022.

Cost Increase in Rehabilitation Construction

Since our initial analysis in November 2022, the cost of construction for rehabilitating the Barry Building has indeed increased. From June 1, 2021, to June 26, 2024, the cost per square foot has risen from $777 to $1,108, representing a 42.5% increase. This escalation is primarily driven by higher labor costs, increased material prices, and rising transportation and disposal fees. The revised estimate for the rehabilitation now stands at $17.1 million, and we have attached the detailed reports (B-SYS "Estimate Summary Report," C-SYS "Assembly Category Report," and E-SYS "Estimate Detail Report") for your reference.

General Estimate for New Construction

For new commercial construction in Los Angeles, costs currently range from $970 to $1,270 per square foot. In the context of the proposed Annex, we project that costs could exceed $1,200 per square foot. This higher estimate considers the required access and roadway modifications, as well as the necessary replacement of the 70-year-old water main and storm drainage system. Thus, your pro forma estimate of $400 per square foot appears significantly underestimated based on current market conditions.

Conservative Estimate for Demolition Costs

The demolition of a portion of the Barry Building to accommodate the Annex presents some complexities. The targeted section is a CMU structure that supports the original building, necessitating additional structural work post-demolition to ensure stability. We estimate the demolition cost to be approximately $8.50 per square foot, with the added structural support to the original building projected at $135,000. This estimate errs on the conservative side, aligning with your request to mitigate potential negative impacts on land valuation.

We trust that this updated analysis will be valuable for your presentation to the Cultural Heritage Commission. Please feel free to reach out if you need further clarification or additional information.

Sincerely,

Louis Rivera

Mr. Louis Rivera
Sr. Director of Estimating
Hill International, Inc.

Enclosures:

B-SYS - Estimate Summary Report
C-SYS - Assembly Category Report
E-SYS - Estimate Detail Report

B--System Report REV 2
SUBMITTAL: CONCEPT
SOFTWARE VERSION: SUCCESS 5.X
REPORT REVISION: Nov. 5 2003
ESTIMATE SAVED AS: BARRY 6_26_24_V9.pws

Hill International

CONSTRUCTION CONTRACT:
DATABASE USED: RSM MODIFIED
PRINTING DATE: 26 June 2024

PROJECT:
PROJECT SITE: LOS ANGELES
A/E NAME: OWNER
PROJECT SIZE: 15,434.00 SF
CONSTRUCTION FUNDS AVAILABLE, DOLLARS: $17,500,000

ESTIMATOR: HILL
CAT CODE:
UIC:
PROJECT #:
DATE OF ESTIMATE: JUNE 26, 2024
BID DATE: JAN 2025

WBS CODE	DESCRIPTION	COST/PROJECT UOM BASED ON 15,434 SF	COST/ WBS UNIT	TOTAL MARKED UP COSTS MATL	LABOR	EQUIP	UNIT COST	TOTAL
			BARRY BUILDING, PROJECT TOTALS					**17,007,000**
	****PROJECT SUBTOTALS****			6,697,601	5,025,313	1,535,350	3,748,570	17,006,833
BASE BID		***859.03/SF***	***15434@ 859.03BSF***	***6,697,601***	***5,025,313***	***1,535,350***	***0***	***13,258,264***
-BARRY BUILDING STRUCTURAL AND ADA UPGRADE		859.03/SF	15434@ 859.03BSF	**6,697,601**	**5,025,313**	**1,535,350**	**0**	**13,258,264**
A111	STRUCTURAL	380.60/SF	15434@ 380.60BSF	2,471,492	2,639,950	762,717	0	5,874,159
A112	ACCESSIBLE PATH	41.91/SF	15434@ 41.91BSF	395,036	154,471	97,320	0	646,827
A113	PLUMBING	19.99/SF	15434@ 19.99BSF	188,188	75,797	44,502	0	308,487
A114	STAIRS AND BALCONY RAILING	14.02/SF	15434@ 14.02BSF	161,909	48,697	5,783	0	216,390
A115	VERTICAL TRANSPORTATION	72.67/SF	15434@ 72.67BSF	850,456	230,527	40,578	0	1,121,562
A116	TENANT SPACE	162.83/SF	15434@ 162.83BSF	1,505,853	811,545	195,734	0	2,513,133
A117	ABATEMENT	124.81/SF	15434@ 124.81BSF	754,741	877,458	294,155	0	1,926,354
A118	SITE IMPROVEMENTS	42.20/SF	38811@ 16.78SF	369,925	186,868	94,559	0	651,353
OWNER'S COSTS		***242.88/SF***	***16827499@ 0.22TC$***	***0***	***0***	***0***	***3,748,570***	***3,748,570***
-OWNER'S COSTS		242.88/SF	16827499@ 0.22TC$	**0**	**0**	**0**	**3,748,570**	**3,748,570**
B111	OWNER'S COSTS	242.88/SF	16827499@ 0.22TC$	0	0	0	3,748,570	3,748,570

PROJECT:
PROJECT SITE: LOS ANGELES
A/E NAME: OWNER
PROJECT SIZE: 15,434.00SF
CONSTRUCTION FUNDS AVAILABLE, DOLLARS: $17,500,000

ESTIMATOR: HILL
CAT CODE:
UIC:
PROJECT #:
DATE OF ESTIMATE: JUNE 26, 2024

WBS CODE	DESCRIPTION	COST/WBS BASED ON 15,434 SF	COST/ WBS UNIT	TOTAL MARKED UP COSTS MATL	LABOR	EQUIP	UNIT COST	TOTAL
			BARRY BUILDING, PROJECT TOTALS					**17,007,000**
	*****PROJECT SUBTOTALS****			6,697,601	5,025,313	1,535,350	3,748,570	17,006,833
BASE BID		**859.03/SF**	**15434@ 859.03BSF**	**6,697,601**	**5,025,313**	**1,535,350**	**0**	**13,258,264**
-BARRY BUILDING STRUCTURAL AND ADA UPGRADE		**859.03/SF**	**15434@ 859.03BSF**	**6,697,601**	**5,025,313**	**1,535,350**	**0**	**13,258,264**
A1 STRUCTURAL		**380.60/SF**	**15434@ 380.60BSF**	**2,471,492**	**2,639,950**	**762,717**	**0**	**5,874,159**
A111	ROOF	30.07/SF	7142@ 64.99SF	168,366	219,706	76,062	0	464,134
A111AA	DEMO ROOF	5.12/SF	7142@ 11.07SF	11,619	53,503	13,930	0	79,052
A111AA	NEW 3/4" PLYWOOD ROOF SHEATHING	9.46/SF	7142@ 20.43SF	43,999	77,410	24,532	0	145,941
A111AA	NEW ROOF	15.49/SF	7142@ 33.48SF	112,748	88,794	37,600	0	239,141
A111	2ND STORY FLOOR	19.01/SF	7142@ 41.09SF	87,999	166,996	38,463	0	293,457
A111AB	DEMO FLOOR DECKING FLOOR COVERINGS	9.56/SF	7142@ 20.65SF	43,999	89,586	13,930	0	147,516
A111AB	NEW 3/4" PLYWOOD FLOOR SHEATHING	9.46/SF	7142@ 20.43SF	43,999	77,410	24,532	0	145,941
A111	NEW 2-STORY STEEL MOMENT FRAME	27.70/SF	7142@ 59.87SF	181,444	133,473	112,678	0	427,594
A111AC	FOUNDATIONS	0.59/SF	6@ 1508.10EA	4,955	2,929	1,164	0	9,049
A111AC	DEMO OF SOG AT ENTRY	3.26/SF	1200@ 41.99SF	14,323	12,762	23,302	0	50,388
A111AC	SOG REPLACEMENT	2.61/SF	1200@ 33.56SF	17,419	17,783	5,075	0	40,277
A111AC	DEMO STRUCTURE	5.67/SF	1200@ 72.89SF	19,522	28,223	39,728	0	87,472
A111AC	W12x96 (8 EA TOTAL)	7.34/SF	119@ 952.53LF	70,379	26,014	16,958	0	113,351
A111AC	W14x132	5.49/SF	150@ 565.34LF	30,634	32,791	21,376	0	84,800
A111AC	RESTORE STRUCTURE @ ENTRY	2.74/SF	1200@ 35.21SF	24,211	12,971	5,075	0	42,257
A111	2-STORY SHEAR WALL	49.14/SF	245@ 3095.47LF	396,178	257,417	104,794	0	758,389
A111AD	SLAB DEMO	4.00/SF	1470@ 41.99SF	17,546	15,633	28,545	0	61,725
A111AD	SHEAR WALL FOUNDATIONS	5.98/SF	245@ 377.03LF	50,587	29,900	11,884	0	92,371
A111AD	SOG REPLACEMENT	3.20/SF	1470@ 33.56SF	21,339	21,784	6,217	0	49,339
A111AD	NEW 2-STORY SHEAR WALL	15.49/SF	245@ 976.11LF	139,144	67,757	32,246	0	239,146
A111AD	DRYWALL - FINISHES	13.46/SF	12250@ 16.96SF	118,626	75,208	13,955	0	207,789
A111AD	WALL DEMO	7.00/SF	6125@ 17.64SF	48,936	47,135	11,947	0	108,018
A111	STRENGTHEN EXISTING 2-STORY SHEAR WALL	24.01/SF	198@ 1871.80LF	181,637	152,838	36,142	0	370,617
A111AE	STRENGTHEN EXISTING 2-STORY SHEAR WALL	7.48/SF	4950@ 23.31SF	46,219	53,965	15,209	0	115,393
A111AE	WALL DEMO	5.66/SF	4950@ 17.64SF	39,548	38,093	9,655	0	87,296
A111AE	DRYWALL - FINISHES	10.88/SF	9900@ 16.96SF	95,869	60,780	11,278	0	167,928
A111	SHEAR WALL ON INT OF EXT WALL	26.80/SF	7142@ 57.91SF	192,909	176,672	44,010	0	413,591
A111AF	NEW 2-STORY SHEAR WALL	10.79/SF	7142@ 23.31SF	66,686	77,862	21,943	0	166,492
A111AF	WALL DEMO	8.16/SF	7142@ 17.64SF	57,062	54,962	13,930	0	125,954
A111AF	DRYWALL - FINISHES	7.85/SF	7142@ 16.96SF	69,161	43,848	8,136	0	121,145
A111	DEMO & RESTORE CEILINGS	33.80/SF	15434@ 33.80BSF	272,770	201,157	47,687	0	521,613
A111AG	CEILING DEMO	16.03/SF	15434@ 16.03bSF	123,311	94,029	30,104	0	247,444
A111AG	DRYWALL - FINISHES	17.76/SF	15434@ 17.76BSF	149,459	107,128	17,583	0	274,170
A111	MEP- FP - OUTLETS - LIGHTS - GRILLS - DUCTWORK	144.78/SF	15434@ 144.78BSF	808,923	1,217,303	208,304	0	2,234,531
A111AH	ELECTRICAL	33.88/SF	15434@ 33.88BSF	380,333	112,501	30,104	0	522,938
A111AH	MECHANICAL	81.93/SF	15434@ 81.93BSF	138,082	978,208	148,149	0	1,264,439
A111AH	FIRE PROTECTION	28.97/SF	15434@ 28.97BSF	290,509	126,593	30,051	0	447,153
A111	REPLACE PLATE DAMAGED BY MOISTURE & TERMITES IST FLOOR	25.28/SF	250@ 1560.93LF	181,267	114,389	94,577	0	390,233
A111AI	DEMO REQUIRED TO REPLACE PLATE	8.99/SF	250@ 555.22LF	32,810	45,383	60,612	0	138,805
A111AI	REPLACE PLATE - STUDS - PLASTER	12.91/SF	250@ 797.31LF	108,509	62,032	28,787	0	199,328
A111AI	REINFORCE STUD - TOP PLATE CONNECTION	3.38/SF	5000@ 10.42LF	39,948	6,974	5,178	0	52,100
A1 ACCESSIBLE PATH		**41.91/SF**	**15434@ 41.91BSF**	**395,036**	**154,471**	**97,320**	**0**	**646,827**
A112	COMPLIANT PARKING LAYOUT W/ MARKING & SIGNS	33.13/SF	34881@ 14.66SF	324,977	116,418	69,945	0	511,340
A112AA	C OVERLAY - CO-PLANE	32.29/SF	34881@ 14.29SF	317,633	112,743	68,035	0	498,411
A112AA	RESTRIPE - SIGNAGE	0.84/SF	90@ 143.66STALLS	7,344	3,675	1,910	0	12,929
A112	WIDEN SIDEWALKS TO 5Æ AT THE EAST ELEVATION	5.19/SF	135@ 593.38LF	29,343	25,655	25,108	0	80,106
A112AB	WIDEN SIDEWALKS TO 5Æ AT THE EAST ELEVATION	5.19/SF	135@ 593.38LF	29,343	25,655	25,108	0	80,106
A112	MODIFY EXTERIOR DOORWAYS AT THE EAST ELEVATION	2.58/SF	3@ 13259.27EA	30,611	7,455	1,712	0	39,778
A112AC	MODIFY EXTERIOR DOORWAYS AT THE EAST ELEVATION	2.58/SF	3@ 13259.27EA	30,611	7,455	1,712	0	39,778
A112	FLOOR MOUNTED HANDRAIL AT COURTYARD STEPS	0.26/SF	12@ 330.34LF	2,657	1,184	123	0	3,964
A112AD	FLOOR MOUNTED HANDRAIL AT COURTYARD STEPS	0.26/SF	12@ 330.34LF	2,657	1,184	123	0	3,964
A112	CONCRETE CURB OR A WELDED STEEL PLATE AT COURTYARD RAMP (APPROX 3 LF)	0.07/SF	3@ 356.03LF	364	601	103	0	1,068
A112AE	CONCRETE CURB OR A WELDED STEEL PLATE AT COURTYARD RAMP (APPROX 3 LF)	0.07/SF	3@ 356.03LF	364	601	103	0	1,068
A112	POST MOUNTED HORIZ RAIL OR A LANDSCAPE ELEMENT (36 SF)	0.13/SF	6@ 330.34LF	1,328	592	62	0	1,982
A112AF	POST MOUNTED HORIZ RAIL OR A LANDSCAPE ELEMENT (36 SF)	0.13/SF	6@ 330.34LF	1,328	592	62	0	1,982

PROJECT:
PROJECT SITE: LOS ANGELES
A/E NAME: OWNER
PROJECT SIZE: 15,434.00SF
CONSTRUCTION FUNDS AVAILABLE, DOLLARS: $17,500,000

ESTIMATOR: HILL
CAT CODE:
UIC:
PROJECT #:
DATE OF ESTIMATE: JUNE 26, 2024

WBS CODE	DESCRIPTION	COST/WBS BASED ON 15,434 SF	COST/ WBS UNIT	TOTAL MARKED UP COSTS MATL	LABOR	EQUIP	UNIT COST	TOTAL
A112	HANDRAILS FOR THE RAMP LEADING TO THE CMU ADDITION. (13 LF EACH SIDE)	0.56/SF	26@ 330.34LF	5,756	2,566	267	0	8,589
A112AG	HANDRAILS FOR THE RAMP LEADING TO THE CMU ADDITION. (13 LF EACH SIDE)	0.56/SF	26@ 330.34LF	5,756	2,566	267	0	8,589
A1 PLUMBING		**19.99/SF**	**15434@ 19.99BSF**	**188,188**	**75,797**	**44,502**	**0**	**308,487**
A113	UPGRADE THE MENÆS ROOM ON 1ST FLOOR TO COMPLIANCE	3.96/SF	136@ 336.03SF	30,110	10,780	4,810	0	45,700
A113AA	UPGRADE THE MENÆS ROOM ON 1ST FLOOR TO COMPLIANCE	2.96/SF	136@ 336.03SF	30,110	10,780	4,810	0	45,700
A113	UPGRADE WOMENÆS ROOM ON 2ND FLOOR TO COMPLIANCE	3.05/SF	115@ 336.03SF	25,461	9,116	4,067	0	38,644
A113AB	UPGRADE WOMENÆS ROOM ON 2ND FLOOR TO COMPLIANCE	2.50/SF	115@ 336.03SF	25,461	9,116	4,067	0	38,644
A113	ADD UNISEX SINGLE RESTROOM AT 1ST FLOOR	3.92/SF	180@ 336.03SF	39,852	14,268	6,366	0	60,486
A113AC	ADD UNISEX SINGLE RESTROOM AT 1ST FLOOR	3.92/SF	180@ 336.03SF	39,852	14,268	6,366	0	60,486
A113	ADD UNISEX SINGLE RESTROOM AT 2ND FLOOR	0.02/SF		221	79	35	0	336
A113AD	ADD UNISEX SINGLE RESTROOM AT 2ND FLOOR	0.02/SF		221	79	35	0	336
A113	CODE COMPLIANT SIGNS FOR RESTROOMS	0.08/SF	4@ 304.95EA	1,001	187	32	0	1,220
A113AE	CODE COMPLIANT SIGNS FOR RESTROOMS	0.08/SF	4@ 304.95EA	1,001	187	32	0	1,220
A113	WALL MOUNTED DRINKING FOUNTAIN AT 1ST FLOOR IN A NEW ALCOVE	0.47/SF		5,968	908	422	0	7,299
A113AF	WALL MOUNTED DRINKING FOUNTAIN AT 1ST FLOOR IN A NEW ALCOVE	0.47/SF		5,968	908	422	0	7,299
A113	PLUMBING INFRASTRUCTURE	10.03/SF	15434@ 10.03BSF	85,575	40,459	28,769	0	154,803
A113AG	PLUMBING INFRASTRUCTURE	10.03/SF	15434@ 10.03BSF	85,575	40,459	28,769	0	154,803
A1 STAIRS AND BALCONY RAILING		**14.02/SF**	**15434@ 14.02BSF**	**161,909**	**48,697**	**5,783**	**0**	**216,390**
A114	ADD A SOLID OR PERFORATED STEEL PANEL AT EACH OPEN RISER	0.49/SF	40@ 189.25RISERS	4,852	2,125	593	0	7,570
A114AA	ADD A SOLID OR PERFORATED STEEL PANEL AT EACH OPEN RISER	0.49/SF	40@ 189.25RISERS	4,852	2,125	593	0	7,570
A114	ADD CONTRASTING STRIPE AT EACH RISER	3.65/SF	40@ 1407.96EA	55,061	1,120	137	0	56,318
A114AB	ADD CONTRASTING STRIPE AT EACH RISER	3.65/SF	40@ 1407.96EA	55,061	1,120	137	0	56,318
A114	REPLACE EXISTING STEEL GUARDRAILS WITH NEW ONES	3.75/SF	175@ 330.34LF	38,745	17,268	1,797	0	57,810
A114AC	REPLACE EXISTING STEEL GUARDRAILS WITH NEW ONES	3.75/SF	175@ 330.34LF	38,745	17,268	1,797	0	57,810
A114	REPLACE EXISTING 2ND FLOOR BALCONY GUARDRAILS	4.22/SF	197@ 330.34LF	43,615	19,439	2,023	0	65,078
A114AD	REPLACE EXISTING 2ND FLOOR BALCONY GUARDRAILS	4.22/SF	197@ 330.34LF	43,615	19,439	2,023	0	65,078
A114	WALL MOUNTED HANDRAIL AT EA OF 4 STAIRS BETWEEN 2ND FLOOR LEVELS	1.92/SF	120@ 246.78LF	19,637	8,744	1,232	0	29,614
A114AE	WALL MOUNTED HANDRAIL AT EA OF 4 STAIRS BETWEEN 2ND FLOOR LEVELS	1.92/SF	120@ 246.78LF	19,637	8,744	1,232	0	29,614
A1 VERTICAL TRANSPORTATION		**72.67/SF**	**15434@ 72.67BSF**	**850,456**	**230,527**	**40,578**	**0**	**1,121,562**
A115	DEVELOP VERTICAL TRANSPORTATION	70.37/SF		825,910	222,557	37,666	0	1,086,133
A115AA	ADD 2 EA -2-DOOR ELEVATORS W/ 2 STOPS	70.37/SF	2@ 543066.56EA	825,910	222,557	37,666	0	1,086,133
A115	ADD TWO EXTERIOR AREAS OF ASSISTED RESCUE ALONG THE 2ND FLOOR BALCONY	2.30/SF	2@ 17714.51EA	24,546	7,970	2,913	0	35,429
A115AB	ADD TWO EXTERIOR AREAS OF ASSISTED RESCUE ALONG THE 2ND FLOOR BALCONY	2.30/SF	150@ 236.19SF	24,546	7,970	2,913	0	35,429
A1 TENANT SPACE		**162.83/SF**	**15434@ 162.83BSF**	**1,505,853**	**811,545**	**195,734**	**0**	**2,513,133**
A116	WIDEN ALL TENANT DOORWAYS	13.56/SF	40@ 5232.55EA	142,465	54,510	12,327	0	209,302
A116AA	WIDEN ALL TENANT DOORWAYS	13.56/SF	40@ 5232.55EA	142,465	54,510	12,327	0	209,302
A116	MODIFY LANDING TO NECESSARY DOORS	1.94/SF	15434@ 1.94BSF	17,616	9,337	2,968	0	29,920
A116AB	MODIFY LANDING TO NECESSARY DOORS	1.94/SF		17,616	9,337	2,968	0	29,920
A116	PROVIDE HANDRAILS FOR TENANT INTERIOR STEPS	2.88/SF	15@ 2961.36EA	29,456	13,116	1,849	0	44,420
A116AC	PROVIDE HANDRAILS FOR TENANT INTERIOR STEPS	2.88/SF	15@ 2961.36EA	29,456	13,116	1,849	0	44,420
A116	REPLACE DOOR & FRAME FOR DOORS LESS THAN 34" W	9.98/SF	30@ 5136.29EA	103,961	40,883	9,245	0	154,089
A116AD	REPLACE DOOR & FRAME FOR DOORS LESS THAN 34" W	9.98/SF	30@ 5136.29EA	103,961	40,883	9,245	0	154,089
A116	MODIFY & REINSTALL NECESSARY DOORS TO OPEN 90 DEGREES	3.49/SF	25@ 2155.89EA	30,322	21,007	2,568	0	53,897
A116AE	MODIFY & REINSTALL NECESSARY DOORS TO OPEN 90 DEGREES	3.49/SF	25@ 2155.89EA	30,322	21,007	2,568	0	53,897
A116	PROVIDE CODE COMPLIANT SIGNS FOR TENANT ENTRY DOOR	0.79/SF	40@ 304.95EA	10,011	1,867	320	0	12,198
A116AF	PROVIDE CODE COMPLIANT SIGNS FOR TENANT ENTRY DOOR	0.79/SF	40@ 304.95EA	10,011	1,867	320	0	12,198
A116	LEVER DOOR HANDLES	2.05/SF	75@ 421.04EA	28,878	2,101	599	0	31,578
A116AG	LEVER DOOR HANDLES	2.05/SF	75@ 421.04EA	28,878	2,101	599	0	31,578
A116	WINDOW REPLACEMENT	34.03/SF	2200@ 238.77SF	370,216	110,872	44,205	0	525,293
A116AH	WINDOW REPLACEMENT + 10 OPENABLE WINDOWS	34.03/SF	2200@ 238.77SF	370,216	110,872	44,205	0	525,293
A116	REPLACE EXTERIOR WALL FINISHES	94.11/SF	62928@ 23.08SF	772,930	557,852	121,654	0	1,452,436
A116AI	REPLACE EXTERIOR WALL FINISHES	94.11/SF	62928@ 23.08SF	772,930	557,852	121,654	0	1,452,436

PROJECT:
PROJECT SITE: LOS ANGELES
A/E NAME: OWNER
PROJECT SIZE: 15,434.00SF
CONSTRUCTION FUNDS AVAILABLE, DOLLARS: $17,500,000

ESTIMATOR: HILL
CAT CODE:
UIC:
PROJECT #:
DATE OF ESTIMATE: JUNE 26, 2024

WBS CODE	DESCRIPTION	COST/WBS BASED ON 15,434 SF	COST/ WBS UNIT	TOTAL MARKED UP COSTS MATL	LABOR	EQUIP	UNIT COST	TOTAL
A1	**ABATEMENT**	**124.81/SF**	**15434@ 124.81BSF**	**754,741**	**877,458**	**294,155**	**0**	**1,926,354**
A117	ABATEMENT	124.81/SF	15434@ 124.81BSF	754,741	877,458	294,155	0	1,926,354
A117AA	ABATEMENT - ASBESTOUS	23.42/SF	15434@ 23.42BSF	187,195	144,115	30,104	0	361,414
A117AA	ABATEMENT - LEAD PAINT	16.36/SF	15434@ 16.36BSF	133,711	88,686	30,104	0	252,501
A117AA	ABATEMENT - ELECTRICAL WIRE	11.87/SF	15434@ 11.87BSF	92,112	60,972	30,104	0	183,187
A117AA	ABATEMENT - BLACK MOLD	45.47/SF	15434@ 45.47BSF	0	508,491	193,343	0	701,834
A117AA	DUMP FEES	4.30/SF	30@ 2213.98LDS	66,419	0	0	0	66,419
A117AA	REMOVE PCB CONTAINING EQUIPMENT	23.39/SF	5@ 72199.59EA	275,303	75,194	10,501	0	360,998
A1	**SITE IMPROVEMENTS**	**42.20/SF**	**38811@ 16.78SF**	**369,925**	**186,868**	**94,559**	**0**	**651,353**
A118	SITE IMPROVEMENTS	42.20/SF	34881@ 18.67SF	369,925	186,868	94,559	0	651,353
A118AA	DIVERT RAIN WATER TO STORM DRAIN	12.91/SF	350@ 569.31LF	97,800	67,787	33,672	0	199,259
A118AA	UPGRADE PARKING LOT DRAINAGE	12.51/SF	3@ 64351.85EA	132,839	43,096	17,121	0	193,056
A118AA	WIDEN EAST SIDE WALKWAYY TO 5 FEET	5.33/SF	1500@ 54.87SF	46,205	26,773	9,321	0	82,299
A118AA	UPGRADE PARKING LOT TO MEET ADA	0.18/SF	4@ 686.16EA	1,348	1,077	320	0	2,745
A118AA	REPAIR & RESURFACE EAST ROADWAY	4.42/SF	2430@ 28.04SF	43,508	16,581	8,053	0	68,142
A118AA	SEWER LINE REPLACEMENT	6.86/SF	250@ 423.41LF	48,226	31,553	26,073	0	105,852
OWNER'S COSTS		**242.88/SF**	**16827499@ 0.22TC$**	**0**	**0**	**0**	**3,748,570**	**3,748,570**
-OWNER'S COSTS		**242.88/SF**	**16827499@ 0.22TC$**	**0**	**0**	**0**	**3,748,570**	**3,748,570**
B1	**OWNER'S COSTS**	**242.88/SF**	**16827499@ 0.22TC$**	**0**	**0**	**0**	**3,748,570**	**3,748,570**
B111	OWNER'S COST	242.88/SF	16827499@ 0.22TC$	0	0	0	3,748,570	3,748,570
B111AA	DESIGN	107.70/SF	16827499@ 0.10TC$	0	0	0	1,662,291	1,662,291
B111AA	PERMITS	23.08/SF	16827499@ 0.02TC$	0	0	0	356,205	356,205
B111AA	CONSTRUCTION MANAGEMENT	46.16/SF	16827499@ 0.04TC$	0	0	0	712,411	712,411
B111AA	CONTINGENCY @ 15%	65.94/SF	6784419@ 0.15TC$	0	0	0	1,017,663	1,017,663

CODE SUB/CREW	DESCRIPTION	QTY UM	TOTAL COSTS MATERIAL	LABOR	EQUIPMENT	UNIT COST (SUB QUOTE)	TOTAL
BASE BIDA1 BARRY BUILDING STRUCTURAL AND ADA UPGRADE							
A1 STRUCTURAL							
REF COMPLETE							
A111 STRUCTURAL							
A111AA ROOF							
A111AA11 DEMO ROOF	*LEVEL CONTRACTOR ID APPLIED--PRIME*						
* LEVEL IS AN ASSEMBLY WITH UOM OF 1							
	Demo Roof		0.92	4.17	1.13	0.00	6.22
SUB-111/111	0.043 hrs/unit 307 TOTAL HRS	7,142.00 SF	6,578	29,751	8,070	0	44,400
* LINE ITEM ASSEMBLY	Factor:1.0000						
	Subtotal Direct Costs		6,578	29,751	8,070	0	44,400
	Subcontractor Markups		1,655	8,162	1,801	0	11,618
	Prime Contractor Markups		3,385	15,590	4,059	0	23,034
TOTAL A111AA11 DEMO ROOF		307 HRS	11,619	53,503	13,930	0	79,052
7,142.00 SF	*Level Unit Cost-->*		*1.63*	*7.49*	*1.95*	*0.00*	*11.07*
A111AA12 NEW 3/4" PLYWOOD ROOF SHEATHING	*LEVEL CONTRACTOR ID APPLIED--PRIME*						
* LEVEL IS AN ASSEMBLY WITH UOM OF 1							
	New Plywood Decking		3.49	6.03	1.99	0.00	11.51
SUB-711/711	0.068 hrs/unit 486 TOTAL HRS	7,142.00 SF	24,911	43,045	14,213	0	82,169
* LINE ITEM ASSEMBLY	Factor:1.0000						
	Subtotal Direct Costs		24,911	43,045	14,213	0	82,169
	Subcontractor Markups		6,267	11,809	3,171	0	21,247
	Prime Contractor Markups		12,821	22,556	7,148	0	42,525
TOTAL A111AA12 NEW 3/4" PLYWOOD ROOF SHEATHING		486 HRS	43,999	77,410	24,532	0	145,941
7,142.00 SF	*Level Unit Cost-->*		*6.16*	*10.84*	*3.43*	*0.00*	*20.43*
A111AA13 NEW ROOF	*LEVEL CONTRACTOR ID APPLIED--PRIME*						
* LEVEL IS AN ASSEMBLY WITH UOM OF 1							
	New Roof		8.94	6.91	3.05	0.00	18.90
SUB-711/711	0.078 hrs/unit 557 TOTAL HRS	7,142.00 SF	63,835	49,375	21,783	0	134,993
* LINE ITEM ASSEMBLY	Factor:1.0000						
	Subtotal Direct Costs		63,835	49,375	21,783	0	134,993
	Subcontractor Markups		16,060	13,545	4,861	0	34,466
	Prime Contractor Markups		32,853	25,873	10,956	0	69,682
TOTAL A111AA13 NEW ROOF		557 HRS	112,748	88,794	37,600	0	239,141
7,142.00 SF	*Level Unit Cost-->*		*15.79*	*12.43*	*5.26*	*0.00*	*33.48*
SUBTOTAL A111AA ROOF			95,325	122,171	44,066	0	261,562
MARKUP			*1.766*	*1.798*	*1.726*	*0.000*	*1.774*
TOTAL A111AA ROOF			168,366	219,706	76,062	0	464,134
A111AB 2ND STORY FLOOR							
A111AB11 DEMO FLOOR DECKING FLOOR COVERINGS	*LEVEL CONTRACTOR ID APPLIED--PRIME*						
* LEVEL IS AN ASSEMBLY WITH UOM OF 1							
	2Nd Floor Decking		3.49	6.97	1.13	0.00	11.59
SUB-111/111	0.072 hrs/unit 514 TOTAL HRS	7,142.00 SF	24,911	49,816	8,070	0	82,797
* LINE ITEM ASSEMBLY	Factor:1.0000						
	Subtotal Direct Costs		24,911	49,816	8,070	0	82,797
	Subcontractor Markups		6,267	13,666	1,801	0	21,734
	Prime Contractor Markups		12,821	26,104	4,059	0	42,984
TOTAL A111AB11 DEMO FLOOR DECKING FLOOR COVERINGS		514 HRS	43,999	89,586	13,930	0	147,516
7,142.00 SF	*Level Unit Cost-->*		*6.16*	*12.54*	*1.95*	*0.00*	*20.65*

CODE SUB/CREW	DESCRIPTION	QTY UM	TOTAL COSTS MATERIAL	LABOR	EQUIPMENT	UNIT COST (SUB QUOTE)	TOTAL
A111AB 2ND STORY FLOOR							
A111AB12 NEW 3/4" PLYWOOD FLOOR SHEATHING	*LEVEL CONTRACTOR ID APPLIED--PRIME*						
* LEVEL IS AN ASSEMBLY WITH UOM OF 1							
	New Plywood Decking		3.49	6.03	1.99	0.00	11.51
SUB-711/711	0.068 hrs/unit 486 TOTAL HRS	7,142.00 SF	24,911	43,045	14,213	0	82,169
* LINE ITEM ASSEMBLY	Factor:1.0000						
	Subtotal Direct Costs		24,911	43,045	14,213	0	82,169
	Subcontractor Markups		6,267	11,809	3,171	0	21,247
	Prime Contractor Markups		12,821	22,556	7,148	0	42,525
TOTAL A111AB12 NEW 3/4" PLYWOOD FLOOR SHEATHING		486 HRS	43,999	77,410	24,532	0	145,941
7,142.00 SF	*Level Unit Cost-->*		*6.16*	*10.84*	*3.43*	*0.00*	*20.43*
SUBTOTAL A111AB 2ND STORY FLOOR			49,823	92,861	22,283	0	164,966
MARKUP			*1.766*	*1.798*	*1.726*	*0.000*	*1.779*
TOTAL A111AB 2ND STORY FLOOR			87,999	166,996	38,463	0	293,457
A111AC NEW 2-STORY STEEL MOMENT FRAME							
A111AC11 FOUNDATIONS	*LEVEL CONTRACTOR ID APPLIED--PRIME*						
	Concrete		467.61	271.45	112.41	0.00	851.47
SUB-311/311	2.8 hrs/unit 17 TOTAL HRS	6.00 CY	2,806	1,629	674	0	5,109
* LINE ITEM ASSEMBLY	Factor:1.0000						
	Subtotal Direct Costs		2,806	1,629	674	0	5,109
	Subcontractor Markups		706	447	150	0	1,303
	Prime Contractor Markups		1,444	853	339	0	2,637
TOTAL A111AC11 FOUNDATIONS		17 HRS	4,955	2,929	1,164	0	9,049
6.00 EA	*Level Unit Cost-->*		*825.91*	*488.16*	*194.03*	*0.00*	*1,508.10*
A111AC12 DEMO OF SOG AT ENTRY	*LEVEL CONTRACTOR ID APPLIED--PRIME*						
	Slab Demo		6.76	5.91	11.25	0.00	23.92
SUB-311/311	0.061 hrs/unit 73 TOTAL HRS	1,200.00 SF	8,110	7,096	13,500	0	28,706
* LINE ITEM ASSEMBLY	Factor:1.0000						
	Subtotal Direct Costs		8,110	7,096	13,500	0	28,706
	Subcontractor Markups		2,040	1,947	3,012	0	6,999
	Prime Contractor Markups		4,174	3,719	6,790	0	14,682
TOTAL A111AC12 DEMO OF SOG AT ENTRY		73 HRS	14,323	12,762	23,302	0	50,388
1,200.00 SF	*Level Unit Cost-->*		*11.94*	*10.63*	*19.42*	*0.00*	*41.99*
A111AC13 SOG REPLACEMENT	*LEVEL CONTRACTOR ID APPLIED--PRIME*						
	Slab On Grade Replacement		8.22	8.24	2.45	0.00	18.91
SUB-311/311	0.085 hrs/unit 102 TOTAL HRS	1,200.00 SF	9,862	9,889	2,940	0	22,691
* LINE ITEM ASSEMBLY	Factor:1.0000						
	Subtotal Direct Costs		9,862	9,889	2,940	0	22,691
	Subcontractor Markups		2,481	2,713	656	0	5,850
	Prime Contractor Markups		5,076	5,182	1,479	0	11,736
TOTAL A111AC13 SOG REPLACEMENT		102 HRS	17,419	17,783	5,075	0	40,277
1,200.00 SF	*Level Unit Cost-->*		*14.52*	*14.82*	*4.23*	*0.00*	*33.56*
A111AC14 DEMO STRUCTURE	*LEVEL CONTRACTOR ID APPLIED--PRIME*						
	Demo Structure		9.21	13.08	19.18	0.00	41.47
SUB-311/111	0.135 hrs/unit 162 TOTAL HRS	1,200.00 SF	11,053	15,694	23,016	0	49,762
* LINE ITEM ASSEMBLY	Factor:1.0000						
	Subtotal Direct Costs		11,053	15,694	23,016	0	49,762
	Subcontractor Markups		2,781	4,305	5,136	0	12,222
	Prime Contractor Markups		5,688	8,224	11,576	0	25,488
TOTAL A111AC14 DEMO STRUCTURE		162 HRS	19,522	28,223	39,728	0	87,472
1,200.00 SF	*Level Unit Cost-->*		*16.27*	*23.52*	*33.11*	*0.00*	*72.89*
A111AC15 W12x96 (8 EA TOTAL)	*LEVEL CONTRACTOR ID APPLIED--PRIME*						
	Structural Steel		3.49	1.27	0.86	0.00	5.61
SUB-511/511	0.015 hrs/unit 171 TOTAL HRS	11,424.00 LBS	39,847	14,465	9,825	0	64,137
* LINE ITEM ASSEMBLY	Factor:96.0000						

CODE SUB/CREW	DESCRIPTION	QTY UM	TOTAL COSTS MATERIAL	LABOR	EQUIPMENT	UNIT COST (SUB QUOTE)	TOTAL
A111AC NEW 2-STORY STEEL MOMENT FRAME							
A111AC15 W12x96 (8 EA TOTAL)	*LEVEL CONTRACTOR ID APPLIED--PRIME*						
	Subtotal Direct Costs		39,847	14,465	9,825	0	64,137
	Subcontractor Markups		10,025	3,968	2,192	0	16,185
	Prime Contractor Markups		20,507	7,580	4,941	0	33,029
	TOTAL A111AC15 W12x96 (8 EA TOTAL)	171 HRS	70,379	26,014	16,958	0	113,351
	119.00 LF	*Level Unit Cost-->*	*591.42*	*218.60*	*142.51*	*0.00*	*952.53*
A111AC16 W14x132	*LEVEL CONTRACTOR ID APPLIED--PRIME*						
	Structural Steel		1.20	1.27	0.86	0.00	3.33
	SUB-511/511 0.015 hrs/unit 216 TOTAL HRS	14,400.00 LBS	17,344	18,234	12,384	0	47,962
	* LINE ITEM ASSEMBLY Factor:96.0000						
	Subtotal Direct Costs		17,344	18,234	12,384	0	47,962
	Subcontractor Markups		4,363	5,002	2,763	0	12,129
	Prime Contractor Markups		8,926	9,555	6,229	0	24,710
	TOTAL A111AC16 W14x132	216 HRS	30,634	32,791	21,376	0	84,800
	150.00 LF	*Level Unit Cost-->*	*204.23*	*218.60*	*142.51*	*0.00*	*565.34*
A111AC17 RESTORE STRUCTURE @ ENTRY	*LEVEL CONTRACTOR ID APPLIED--PRIME*						
	Restore Entry Structure		11.42	6.01	2.45	0.00	19.88
	SUB-311/311 0.062 hrs/unit 74 TOTAL HRS	1,200.00 SF	13,708	7,213	2,940	0	23,861
	* LINE ITEM ASSEMBLY Factor:1.0000						
	Subtotal Direct Costs		13,708	7,213	2,940	0	23,861
	Subcontractor Markups		3,449	1,979	656	0	6,083
	Prime Contractor Markups		7,055	3,780	1,479	0	12,313
	TOTAL A111AC17 RESTORE STRUCTURE @ ENTRY	74 HRS	24,211	12,971	5,075	0	42,257
	1,200.00 SF	*Level Unit Cost-->*	*20.18*	*10.81*	*4.23*	*0.00*	*35.21*
	SUBTOTAL A111AC NEW 2-STORY STEEL MOMENT FRAME		102,729	74,219	65,279	0	242,228
	MARKUP		*1.766*	*1.798*	*1.726*	*0.000*	*1.765*
	TOTAL A111AC NEW 2-STORY STEEL MOMENT FRAME		181,444	133,473	112,678	0	427,594
A111AD 2-STORY SHEAR WALL							
A111AD11 SLAB DEMO	*LEVEL CONTRACTOR ID APPLIED--PRIME*						
* LEVEL IS AN ASSEMBLY WITH UOM OF 6							
	Slab Demo		6.76	5.91	11.25	0.00	23.92
	SUB-311/311 0.061 hrs/unit 90 TOTAL HRS	1,470.00 SF	9,934	8,693	16,538	0	35,165
	* LINE ITEM ASSEMBLY Factor:1.0000						
	Subtotal Direct Costs		9,934	8,693	16,538	0	35,165
	Subcontractor Markups		2,499	2,385	3,690	0	8,574
	Prime Contractor Markups		5,113	4,555	8,318	0	17,986
	TOTAL A111AD11 SLAB DEMO	90 HRS	17,546	15,633	28,545	0	61,725
	1,470.00 SF	*Level Unit Cost-->*	*11.94*	*10.63*	*19.42*	*0.00*	*41.99*
A111AD12 SHEAR WALL FOUNDATIONS	*LEVEL CONTRACTOR ID APPLIED--PRIME*						
* LEVEL IS AN ASSEMBLY WITH UOM OF 1							
	Concrete		467.61	271.45	112.41	0.00	851.47
	SUB-311/311 2.8 hrs/unit 172 TOTAL HRS	61.25 CY	28,641	16,626	6,885	0	52,153
	* LINE ITEM ASSEMBLY Factor:0.2500						
	Subtotal Direct Costs		28,641	16,626	6,885	0	52,153
	Subcontractor Markups		7,206	4,561	1,536	0	13,303
	Prime Contractor Markups		14,740	8,712	3,463	0	26,916
	TOTAL A111AD12 SHEAR WALL FOUNDATIONS	172 HRS	50,587	29,900	11,884	0	92,371
	245.00 LF	*Level Unit Cost-->*	*206.48*	*122.04*	*48.51*	*0.00*	*377.03*
A111AD13 SOG REPLACEMENT	*LEVEL CONTRACTOR ID APPLIED--PRIME*						
* LEVEL IS AN ASSEMBLY WITH UOM OF 6							
	Slab On Grade Replacement		8.22	8.24	2.45	0.00	18.91
	SUB-311/311 0.085 hrs/unit 125 TOTAL HRS	1,470.00 SF	12,081	12,113	3,602	0	27,796
	* LINE ITEM ASSEMBLY Factor:1.0000						

CODE SUB/CREW	DESCRIPTION	QTY UM	TOTAL COSTS MATERIAL	LABOR	EQUIPMENT	UNIT COST (SUB QUOTE)	TOTAL
A111AD 2-STORY SHEAR WALL							
A111AD13 SOG REPLACEMENT	*LEVEL CONTRACTOR ID APPLIED--PRIME*						
* LEVEL IS AN ASSEMBLY WITH UOM OF 6							
	Subtotal Direct Costs		12,081	12,113	3,602	0	27,796
	Subcontractor Markups		3,039	3,323	804	0	7,166
	Prime Contractor Markups		6,218	6,348	1,811	0	14,377
TOTAL A111AD13 SOG REPLACEMENT		125 HRS	21,339	21,784	6,217	0	49,339
1,470.00 SF	*Level Unit Cost-->*		*14.52*	*14.82*	*4.23*	*0.00*	*33.56*
A111AD14 NEW 2-STORY SHEAR WALL	*LEVEL CONTRACTOR ID APPLIED--PRIME*						
* LEVEL IS AN ASSEMBLY WITH UOM OF 1							
	Shear Wall Incl Wood Framing - Plywood		12.86	6.15	3.05	0.00	22.06
	SUB-911/911 0.069 hrs/unit 423 TOTAL HRS	6,125.00 SF	78,780	37,677	18,681	0	135,138
	* LINE ITEM ASSEMBLY Factor:25.0000						
	Subtotal Direct Costs		78,780	37,677	18,681	0	135,138
	Subcontractor Markups		19,820	10,336	4,168	0	34,324
	Prime Contractor Markups		40,544	19,743	9,396	0	69,684
TOTAL A111AD14 NEW 2-STORY SHEAR WALL		423 HRS	139,144	67,757	32,246	0	239,146
245.00 LF	*Level Unit Cost-->*		*567.93*	*276.56*	*131.61*	*0.00*	*976.11*
A111AD15 DRYWALL - FINISHES	*LEVEL CONTRACTOR ID APPLIED--PRIME*						
* LEVEL IS AN ASSEMBLY WITH UOM OF 50							
	Drywall		4.23	2.50	0.46	0.00	7.19
	SUB-911/911 0.028 hrs/unit 343 TOTAL HRS	12,250.00 SF	51,808	30,579	5,635	0	88,021
	* LINE ITEM ASSEMBLY Factor:1.0000						
	Paint		1.25	0.92	0.20	0.00	2.37
	SUB-991/991 0.012 hrs/unit 147 TOTAL HRS	12,250.00 SF	15,355	11,242	2,450	0	29,047
	* LINE ITEM ASSEMBLY Factor:1.0000						
	Subtotal Direct Costs		67,163	41,820	8,085	0	117,069
	Subcontractor Markups		16,897	11,473	1,804	0	30,174
	Prime Contractor Markups		34,566	21,914	4,066	0	60,547
TOTAL A111AD15 DRYWALL - FINISHES		490 HRS	118,626	75,208	13,955	0	207,789
12,250.00 SF	*Level Unit Cost-->*		*9.68*	*6.14*	*1.14*	*0.00*	*16.96*
A111AD16 WALL DEMO	*LEVEL CONTRACTOR ID APPLIED--PRIME*						
* LEVEL IS AN ASSEMBLY WITH UOM OF 25							
	Wall Demo		4.52	4.28	1.13	0.00	9.93
	SUB-911/911 0.048 hrs/unit 294 TOTAL HRS	6,125.00 SF	27,706	26,210	6,921	0	60,838
	* LINE ITEM ASSEMBLY Factor:1.0000						
	Subtotal Direct Costs		27,706	26,210	6,921	0	60,838
	Subcontractor Markups		6,970	7,190	1,544	0	15,705
	Prime Contractor Markups		14,259	13,734	3,481	0	31,475
TOTAL A111AD16 WALL DEMO		294 HRS	48,936	47,135	11,947	0	108,018
6,125.00 SF	*Level Unit Cost-->*		*7.99*	*7.70*	*1.95*	*0.00*	*17.64*
SUBTOTAL A111AD 2-STORY SHEAR WALL			224,306	143,141	60,712	0	428,158
MARKUP			*1.766*	*1.798*	*1.726*	*0.000*	*1.771*
TOTAL A111AD 2-STORY SHEAR WALL			396,178	257,417	104,794	0	758,389
A111AE STRENGTHEN EXISTING 2-STORY SHEAR WALL							
A111AE11 STRENGTHEN EXISTING 2-STORY SHEAR WALL	*LEVEL CONTRACTOR ID APPLIED--PRIME*						
* LEVEL IS AN ASSEMBLY WITH UOM OF 25							
	Strengthen Existing 2-Story Shear Wall		5.29	6.06	1.78	0.00	13.13
	SUB-911/911 0.068 hrs/unit 337 TOTAL HRS	4,950.00 SF	26,168	30,008	8,811	0	64,987
	* LINE ITEM ASSEMBLY Factor:1.0000						
	Subtotal Direct Costs		26,168	30,008	8,811	0	64,987
	Subcontractor Markups		6,583	8,232	1,966	0	16,782
	Prime Contractor Markups		13,468	15,725	4,432	0	33,624
TOTAL A111AE11 STRENGTHEN EXISTING 2-STORY SHEAR WALL		337 HRS	46,219	53,965	15,209	0	115,393
4,950.00 SF	*Level Unit Cost-->*		*9.34*	*10.90*	*3.07*	*0.00*	*23.31*
A111AE12 WALL DEMO	*LEVEL CONTRACTOR ID APPLIED--PRIME*						
* LEVEL IS AN ASSEMBLY WITH UOM OF 25							
	Wall Demo		4.52	4.28	1.13	0.00	9.93
	SUB-911/911 0.048 hrs/unit 238 TOTAL HRS	4,950.00 SF	22,391	21,182	5,594	0	49,167

CODE SUB/CREW	DESCRIPTION	QTY UM	TOTAL COSTS MATERIAL	LABOR	EQUIPMENT	UNIT COST (SUB QUOTE)	TOTAL
A111AE	**STRENGTHEN EXISTING 2-STORY SHEAR WALL**						
A111AE12	WALL DEMO *LEVEL CONTRACTOR ID APPLIED--PRIME*						
	* LEVEL IS AN ASSEMBLY WITH UOM OF 25						
	* LINE ITEM ASSEMBLY Factor:1.0000						
	Subtotal Direct Costs		22,391	21,182	5,594	0	49,167
	Subcontractor Markups		5,633	5,811	1,248	0	12,692
	Prime Contractor Markups		11,524	11,100	2,813	0	25,437
	TOTAL A111AE12 WALL DEMO	238 HRS	39,548	38,093	9,655	0	87,296
	4,950.00 SF	*Level Unit Cost-->*	*7.99*	*7.70*	*1.95*	*0.00*	*17.64*
A111AE13	DRYWALL - FINISHES *LEVEL CONTRACTOR ID APPLIED--PRIME*						
	* LEVEL IS AN ASSEMBLY WITH UOM OF 50						
	Drywall		4.23	2.50	0.46	0.00	7.19
	SUB-911/911 0.028 hrs/unit	277 TOTAL HRS 9,900.00 SF	41,869	24,713	4,554	0	71,136
	* LINE ITEM ASSEMBLY Factor:1.0000						
	Paint		1.25	0.92	0.20	0.00	2.37
	SUB-991/991 0.012 hrs/unit	119 TOTAL HRS 9,900.00 SF	12,410	9,085	1,980	0	23,475
	* LINE ITEM ASSEMBLY Factor:1.0000						
	Subtotal Direct Costs		54,279	33,798	6,534	0	94,610
	Subcontractor Markups		13,656	9,272	1,458	0	24,386
	Prime Contractor Markups		27,935	17,710	3,286	0	48,932
	TOTAL A111AE13 DRYWALL - FINISHES	396 HRS	95,869	60,780	11,278	0	167,928
	9,900.00 SF	*Level Unit Cost-->*	*9.68*	*6.14*	*1.14*	*0.00*	*16.96*
	SUBTOTAL A111AE STRENGTHEN EXISTING 2-STORY SHEAR WALL		102,838	84,988	20,939	0	208,765
	MARKUP		*1.766*	*1.798*	*1.726*	*0.000*	*1.775*
	TOTAL A111AE STRENGTHEN EXISTING 2-STORY SHEAR WALL		181,637	152,838	36,142	0	370,617
A111AF	**SHEAR WALL ON INT OF EXT WALL**						
A111AF11	NEW 2-STORY SHEAR WALL *LEVEL CONTRACTOR ID APPLIED--PRIME*						
	* LEVEL IS AN ASSEMBLY WITH UOM OF 1						
	Strengthen Existing 2-Story Shear Wall		5.29	6.06	1.78	0.00	13.13
	SUB-911/911 0.068 hrs/unit	486 TOTAL HRS 7,142.00 SF	37,756	43,297	12,713	0	93,765
	* LINE ITEM ASSEMBLY Factor:1.0000						
	Subtotal Direct Costs		37,756	43,297	12,713	0	93,765
	Subcontractor Markups		9,499	11,878	2,837	0	24,213
	Prime Contractor Markups		19,431	22,688	6,394	0	48,513
	TOTAL A111AF11 NEW 2-STORY SHEAR WALL	486 HRS	66,686	77,862	21,943	0	166,492
	7,142.00 SF	*Level Unit Cost-->*	*9.34*	*10.90*	*3.07*	*0.00*	*23.31*
A111AF12	WALL DEMO *LEVEL CONTRACTOR ID APPLIED--PRIME*						
	* LEVEL IS AN ASSEMBLY WITH UOM OF 1						
	Wall Demo		4.52	4.28	1.13	0.00	9.93
	SUB-911/911 0.048 hrs/unit	343 TOTAL HRS 7,142.00 SF	32,307	30,562	8,070	0	70,940
	* LINE ITEM ASSEMBLY Factor:1.0000						
	Subtotal Direct Costs		32,307	30,562	8,070	0	70,940
	Subcontractor Markups		8,128	8,384	1,801	0	18,313
	Prime Contractor Markups		16,627	16,015	4,059	0	36,701
	TOTAL A111AF12 WALL DEMO	343 HRS	57,062	54,962	13,930	0	125,954
	7,142.00 SF	*Level Unit Cost-->*	*7.99*	*7.70*	*1.95*	*0.00*	*17.64*
A111AF13	DRYWALL - FINISHES *LEVEL CONTRACTOR ID APPLIED--PRIME*						
	* LEVEL IS AN ASSEMBLY WITH UOM OF 1						
	Drywall		4.23	2.50	0.46	0.00	7.19
	SUB-911/911 0.028 hrs/unit	200 TOTAL HRS 7,142.00 SF	30,205	17,828	3,285	0	51,318
	* LINE ITEM ASSEMBLY Factor:1.0000						
	Paint		1.25	0.92	0.20	0.00	2.37
	SUB-991/991 0.012 hrs/unit	86 TOTAL HRS 7,142.00 SF	8,952	6,554	1,428	0	16,935
	* LINE ITEM ASSEMBLY Factor:1.0000						
	Subtotal Direct Costs		39,157	24,382	4,714	0	68,253
	Subcontractor Markups		9,851	6,689	1,052	0	17,592
	Prime Contractor Markups		20,153	12,777	2,371	0	35,300
	TOTAL A111AF13 DRYWALL - FINISHES	286 HRS	69,161	43,848	8,136	0	121,145
	7,142.00 SF	*Level Unit Cost-->*	*9.68*	*6.14*	*1.14*	*0.00*	*16.96*

CODE SUB/CREW	DESCRIPTION	QTY UM	TOTAL COSTS MATERIAL	LABOR	EQUIPMENT	UNIT COST (SUB QUOTE)	TOTAL
	* LEVEL IS AN ASSEMBLY WITH UOM OF 1						
	SUBTOTAL A111AF SHEAR WALL ON INT OF EXT WALL		109,220	98,241	25,497	0	232,958
	MARKUP		*1.766*	*1.798*	*1.726*	*0.000*	*1.775*
	TOTAL A111AF SHEAR WALL ON INT OF EXT WALL		192,909	176,672	44,010	0	413,591
	A111AG DEMO & RESTORE CEILINGS						
	A111AG11 CEILING DEMO *LEVEL CONTRACTOR ID APPLIED--PRIME*						
	* LEVEL IS AN ASSEMBLY WITH UOM OF 1						
	Ceilingl Demo		4.52	3.39	1.13	0.00	9.04
SUB-911/911	0.038 hrs/unit 586 TOTAL HRS	15,434.00 SF	69,816	52,286	17,440	0	139,542
	* LINE ITEM ASSEMBLY Factor:1.0000						
	Subtotal Direct Costs		69,816	52,286	17,440	0	139,542
	Subcontractor Markups		17,564	14,344	3,892	0	35,800
	Prime Contractor Markups		35,931	27,399	8,772	0	72,101
	TOTAL A111AG11 CEILING DEMO	586 HRS	123,311	94,029	30,104	0	247,444
	15,434.00 bSF *Level Unit Cost-->*		*7.99*	*6.09*	*1.95*	*0.00*	*16.03*
	A111AG12 DRYWALL - FINISHES *LEVEL CONTRACTOR ID APPLIED--PRIME*						
	* LEVEL IS AN ASSEMBLY WITH UOM OF 1						
	Drywall		4.23	2.94	0.46	0.00	7.63
SUB-911/911	0.033 hrs/unit 509 TOTAL HRS	15,434.00 SF	65,273	45,406	7,100	0	117,779
	* LINE ITEM ASSEMBLY Factor:1.0000						
	Paint		1.25	0.92	0.20	0.00	2.37
SUB-991/991	0.012 hrs/unit 185 TOTAL HRS	15,434.00 SF	19,347	14,164	3,087	0	36,597
	* LINE ITEM ASSEMBLY Factor:1.0000						
	Subtotal Direct Costs		84,620	59,570	10,186	0	154,377
	Subcontractor Markups		21,289	16,342	2,273	0	39,904
	Prime Contractor Markups		43,550	31,215	5,123	0	79,889
	TOTAL A111AG12 DRYWALL - FINISHES	695 HRS	149,459	107,128	17,583	0	274,170
	15,434.00 BSF *Level Unit Cost-->*		*9.68*	*6.94*	*1.14*	*0.00*	*17.76*
	SUBTOTAL A111AG DEMO & RESTORE CEILINGS		154,436	111,856	27,627	0	293,919
	MARKUP		*1.766*	*1.798*	*1.726*	*0.000*	*1.775*
	TOTAL A111AG DEMO & RESTORE CEILINGS		272,770	201,157	47,687	0	521,613
	A111AH MEP- FP - OUTLETS - LIGHTS - GRILLS - DUCTW						
	A111AH11 ELECTRICAL *LEVEL CONTRACTOR ID APPLIED--PRIME*						
	* LEVEL IS AN ASSEMBLY WITH UOM OF 1						
	Electrical		13.95	4.05	1.13	0.00	19.14
SUB-161/161	0.038 hrs/unit 586 TOTAL HRS	15,434.00 SF	215,335	62,558	17,440	0	295,334
	* LINE ITEM ASSEMBLY Factor:1.0000						
	Subtotal Direct Costs		215,335	62,558	17,440	0	295,334
	Subcontractor Markups		54,175	17,162	3,892	0	75,228
	Prime Contractor Markups		110,823	32,781	8,772	0	152,376
	TOTAL A111AH11 ELECTRICAL	586 HRS	380,333	112,501	30,104	0	522,938
	15,434.00 BSF *Level Unit Cost-->*		*24.64*	*7.29*	*1.95*	*0.00*	*33.88*
	A111AH12 MECHANICAL *LEVEL CONTRACTOR ID APPLIED--PRIME*						
	* LEVEL IS AN ASSEMBLY WITH UOM OF 1REF COMPLETE						
	Mechanical - Duct Work & Package Units		0.69	33.51	5.03	0.00	39.23
SUB-152/152	0.32 hrs/unit 4939 TOTAL HRS	15,434.00 SF	10,599	517,202	77,633	0	605,434
	* LINE ITEM ASSEMBLY Factor:1.0000						
	Reconstruct Mechanical Rooms On 2 Floors 2 Hr Rated Assemblies		168.95	66.86	20.49	0.00	256.30
SUB-911/911	0.75 hrs/unit 300 TOTAL HRS	400.00 SF	67,580	26,745	8,196	0	102,521
	Subtotal Direct Costs		78,179	543,948	85,829	0	707,955
	Subcontractor Markups		19,668	149,226	19,152	0	188,046
	Prime Contractor Markups		40,235	285,035	43,168	0	368,438
	TOTAL A111AH12 MECHANICAL	5,239 HRS	138,082	978,208	148,149	0	1,264,439
	15,434.00 BSF *Level Unit Cost-->*		*8.95*	*63.38*	*9.60*	*0.00*	*81.93*
	A111AH13 FIRE PROTECTION *LEVEL CONTRACTOR ID APPLIED--PRIME*						
	* LEVEL IS AN ASSEMBLY WITH UOM OF 1REF COMPLETE						
	Fire Protection		3.49	1.68	0.46	0.00	5.63
SUB-154/154	0.018 hrs/unit 278 TOTAL HRS	15,434.00 SF	53,834	25,892	7,100	0	86,826
	* LINE ITEM ASSEMBLY Factor:1.0000						

CODE SUB/CREW	DESCRIPTION	QTY UM	TOTAL COSTS MATERIAL	LABOR	EQUIPMENT	UNIT COST (SUB QUOTE)	TOTAL
	* LEVEL IS AN ASSEMBLY WITH UOM OF 1REF COMPLETE						
	Install 4" Water Line		31.07	21.44	7.00	0.00	59.50
SUB-154/154	0.23 hrs/unit 35 TOTAL HRS	150.00 LF	4,660	3,215	1,050	0	8,925
	Water Line Replacement & Upgrade For Fire Protection		6.87	2.67	0.60	0.00	10.14
SUB-151/151	0.028 hrs/unit 432 TOTAL HRS	15,434.00	105,985	41,286	9,260	0	156,532
	* LINE ITEM ASSEMBLY Factor:1.0000						
	Subtotal Direct Costs		164,479	70,394	17,410	0	252,283
	Subcontractor Markups		41,380	19,312	3,885	0	64,577
	Prime Contractor Markups		84,650	36,887	8,757	0	130,294
	TOTAL A111AH13 FIRE PROTECTION	744 HRS	290,509	126,593	30,051	0	447,153
	15,434.00 BSF *Level Unit Cost-->*		*18.82*	*8.20*	*1.95*	*0.00*	*28.97*
	SUBTOTAL A111AH MEP- FP - OUTLETS - LIGHTS - GRILLS - DUCTW		457,993	676,900	120,679	0	1,255,572
	MARKUP		*1.766*	*1.798*	*1.726*	*0.000*	*1.780*
	TOTAL A111AH MEP- FP - OUTLETS - LIGHTS - GRILLS - DUCTWORK		808,923	1,217,303	208,304	0	2,234,531
	A111AI REPLACE PLATE DAMAGED BY MOISTURE & TERMITES						
	A111AI11 DEMO REQUIRED TO REPLACE PLATE *LEVEL CONTRACTOR ID APPLIED--PRIME*						
	Building Jack(S)		0.00	5.33	20.23	0.00	25.56
SUB-111/111	0.055 hrs/unit 14 TOTAL HRS	250.00 LF	0	1,332	5,058	0	6,390
	* LINE ITEM ASSEMBLY Factor:1.0000						
	Shoring At Building Perimeter		3.05	2.42	5.03	0.00	10.50
SUB-111/111	0.025 hrs/unit 100 TOTAL HRS	4,000.00 SF	12,208	9,688	20,120	0	42,016
	* LINE ITEM ASSEMBLY Factor:16.0000						
	Removal Of Exterior Plaster		0.70	3.39	2.98	0.00	7.07
SUB-111/111	0.035 hrs/unit 105 TOTAL HRS	3,000.00 SF	2,093	10,172	8,940	0	21,205
	* LINE ITEM ASSEMBLY Factor:12.0000						
	Removal Of Load Bearing Studs		0.24	1.07	0.33	0.00	1.64
SUB-111/111	0.011 hrs/unit 33 TOTAL HRS	3,000.00 SF	719	3,197	990	0	4,906
	* LINE ITEM ASSEMBLY Factor:12.0000						
	Removal Of Plate		0.49	3.39	0.03	0.00	3.91
SUB-111/111	0.035 hrs/unit 9 TOTAL HRS	250.00 LF	123	848	8	0	978
	* LINE ITEM ASSEMBLY Factor:1.0000						
	Debris Removal		686.70	0.00	0.00	0.00	686.70
SUB-111/NoCrew		5.00 LDS	3,434	0	0	0	3,434
	Subtotal Direct Costs		18,576	25,236	35,115	0	78,927
	Subcontractor Markups		4,673	6,923	7,835	0	19,432
	Prime Contractor Markups		9,560	13,224	17,661	0	40,446
	TOTAL A111AI11 DEMO REQUIRED TO REPLACE PLATE	261 HRS	32,810	45,383	60,612	0	138,805
	250.00 LF *Level Unit Cost-->*		*131.24*	*181.53*	*242.45*	*0.00*	*555.22*
	A111AI12 REPLACE PLATE - STUDS - PLASTER *LEVEL CONTRACTOR ID APPLIED--PRIME*						
	Replace Plate "Treated"		4.52	2.42	0.51	0.00	7.46
SUB-311/311	0.025 hrs/unit 6 TOTAL HRS	250.00 LF	1,131	606	128	0	1,864
	* LINE ITEM ASSEMBLY Factor:1.0000						
	Replace Studs		3.43	1.75	0.99	0.00	6.17
SUB-311/311	0.018 hrs/unit 54 TOTAL HRS	3,000.00 LF	10,301	5,235	2,970	0	18,506
	* LINE ITEM ASSEMBLY Factor:12.0000						
	Restore Exterior Plaster		13.95	8.18	3.90	0.00	26.03
SUB-421/421	0.085 hrs/unit 255 TOTAL HRS	3,000.00 SF	41,856	24,542	11,700	0	78,098
	* LINE ITEM ASSEMBLY Factor:12.0000						
	Install Stud Clips		2.67	1.16	1.13	0.00	4.96
SUB-311/311	0.012 hrs/unit 12 TOTAL HRS	1,000.00 EA	2,671	1,163	1,130	0	4,964
	* LINE ITEM ASSEMBLY Factor:4.0000						
	Install H8 Ties Stud To Top Plate		4.25	0.78	0.60	0.00	5.63
SUB-311/311	0.008 hrs/unit 2 TOTAL HRS	250.00 EA	1,063	194	150	0	1,407
	* LINE ITEM ASSEMBLY Factor:1.0000						
	Paint Exterior		1.47	0.92	0.20	0.00	2.59
SUB-991/991	0.012 hrs/unit 36 TOTAL HRS	3,000.00 SF	4,415	2,753	600	0	7,768
	* LINE ITEM ASSEMBLY Factor:12.0000						
	Subtotal Direct Costs		61,435	34,494	16,678	0	112,606
	Subcontractor Markups		15,456	9,463	3,721	0	28,640
	Prime Contractor Markups		31,618	18,075	8,388	0	58,081
	TOTAL A111AI12 REPLACE PLATE - STUDS - PLASTER	365 HRS	108,509	62,032	28,787	0	199,328
	250.00 LF *Level Unit Cost-->*		*434.04*	*248.13*	*115.15*	*0.00*	*797.31*
	A111AI13 REINFORCE STUD - TOP PLATE CONNECTION *LEVEL CONTRACTOR ID APPLIED--PRIME*						
	Install H8 Ties Stud To Top Plate		4.52	0.78	0.60	0.00	5.90
SUB-311/311	0.008 hrs/unit 40 TOTAL HRS	5,000.00 EA	22,618	3,878	3,000	0	29,495

CODE SUB/CREW	DESCRIPTION	QTY UM	TOTAL COSTS MATERIAL	LABOR	EQUIPMENT	UNIT COST (SUB QUOTE)	TOTAL
A111AI	**REPLACE PLATE DAMAGED BY MOISTURE & TERMITES**						
A111AI13	REINFORCE STUD - TOP PLATE CONNECTION *LEVEL CONTRACTOR ID APPLIED--PRIME*						
	* LINE ITEM ASSEMBLY Factor:1.0000						
	Subtotal Direct Costs		22,618	3,878	3,000	0	29,495
	Subcontractor Markups		5,690	1,064	669	0	7,423
	Prime Contractor Markups		11,640	2,032	1,509	0	15,181
	TOTAL A111AI13 REINFORCE STUD - TOP PLATE CONNECTION	40 HRS	39,948	6,974	5,178	0	52,100
	5,000.00 LF *Level Unit Cost-->*		*7.99*	*1.39*	*1.04*	*0.00*	*10.42*
	SUBTOTAL A111AI REPLACE PLATE DAMAGED BY MOISTURE & TERMITES		102,629	63,608	54,793	0	221,029
	MARKUP		*1.766*	*1.798*	*1.726*	*0.000*	*1.766*
	TOTAL A111AI REPLACE PLATE DAMAGED BY MOISTURE & TERMITES IS		181,267	114,389	94,577	0	390,233
A112	**ACCESSIBLE PATH**						
A112AA	**COMPLIANT PARKING LAYOUT W/ MARKING & SIGNS**						
A112AA11	AC OVERLAY - CO-PLANE *LEVEL CONTRACTOR ID APPLIED--PRIME*						
	* LEVEL IS AN ASSEMBLY WITH UOM OF 1						
	Ac Overlay Incl Co-Plane		5.16	1.80	1.13	0.00	8.08
	SUB-221/221 0.018 hrs/unit	628 TOTAL HRS 34,881.00 SF	179,836	62,692	39,416	0	281,944
	* LINE ITEM ASSEMBLY Factor:1.0000						
	Subtotal Direct Costs		179,836	62,692	39,416	0	281,944
	Subcontractor Markups		45,244	17,199	8,795	0	71,238
	Prime Contractor Markups		92,553	32,852	19,824	0	145,229
	TOTAL A112AA11 AC OVERLAY - CO-PLANE	628 HRS	317,633	112,743	68,035	0	498,411
	34,881.00 SF *Level Unit Cost-->*		*9.11*	*3.23*	*1.95*	*0.00*	*14.29*
A112AA12	RESTRIPE - SIGNAGE *LEVEL CONTRACTOR ID APPLIED--PRIME*						
	Stripping		1.91	0.82	0.20	0.00	2.93
	SUB-221/221 0.008 hrs/unit	16 TOTAL HRS 1,980.00 LF	3,777	1,621	396	0	5,794
	* LINE ITEM ASSEMBLY Factor:22.0000						
	Hc Stalls - Markers		2.02	0.85	0.20	0.00	3.07
	SUB-221/221 0.009 hrs/unit	2 TOTAL HRS 180.00 LF	363	153	36	0	552
	Signage		3.05	44.93	112.41	0.00	160.40
	SUB-221/221 0.45 hrs/unit	3 TOTAL HRS 6.00 EA	18	270	674	0	962
	Subtotal Direct Costs		4,158	2,044	1,106	0	7,308
	Subcontractor Markups		1,046	561	247	0	1,854
	Prime Contractor Markups		2,140	1,071	557	0	3,767
	TOTAL A112AA12 RESTRIPE - SIGNAGE	20 HRS	7,344	3,675	1,910	0	12,929
	90.00 STALLS *Level Unit Cost-->*		*81.60*	*40.83*	*21.22*	*0.00*	*143.66*
	SUBTOTAL A112AA COMPLIANT PARKING LAYOUT W/ MARKING & SIGNS		183,994	64,736	40,522	0	289,252
	MARKUP		*1.766*	*1.798*	*1.726*	*0.000*	*1.768*
	TOTAL A112AA COMPLIANT PARKING LAYOUT W/ MARKING & SIGNS		324,977	116,418	69,945	0	511,340
A112AB	**WIDEN SIDEWALKS TO 5Æ AT THE EAST ELEVATION**						
A112AB11	WIDEN SIDEWALKS TO 5Æ AT THE EAST ELEVATION *LEVEL CONTRACTOR ID APPLIED--PRIME*						
	* LEVEL IS AN ASSEMBLY WITH UOM OF 1						
	Slab - Curb Demo		6.76	5.91	11.25	0.00	23.92
	SUB-311/311 0.061 hrs/unit	66 TOTAL HRS 1,080.00 SF	7,299	6,387	12,150	0	25,835
	* LINE ITEM ASSEMBLY Factor:8.0000						
	Slab On Grade Replacement		9.05	8.24	2.45	0.00	19.74
	SUB-311/311 0.085 hrs/unit	69 TOTAL HRS 810.00 SF	7,328	6,675	1,985	0	15,987
	* LINE ITEM ASSEMBLY Factor:6.0000						
	Curb Replacement		14.72	8.92	3.05	0.00	26.68
	SUB-311/311 0.092 hrs/unit	12 TOTAL HRS 135.00 LF	1,987	1,204	412	0	3,602
	* LINE ITEM ASSEMBLY Factor:1.0000						
	Subtotal Direct Costs		16,613	14,266	14,546	0	45,425
	Subcontractor Markups		4,180	3,914	3,246	0	11,339
	Prime Contractor Markups		8,550	7,475	7,316	0	23,342
	TOTAL A112AB11 WIDEN SIDEWALKS TO 5Æ AT THE EAST ELEVAT	147 HRS	29,343	25,655	25,108	0	80,106
	135.00 LF *Level Unit Cost-->*		*217.35*	*190.03*	*185.99*	*0.00*	*593.38*

CODE SUB/CREW	DESCRIPTION	QTY UM	TOTAL COSTS MATERIAL	LABOR	EQUIPMENT	UNIT COST (SUB QUOTE)	TOTAL
	* LEVEL IS AN ASSEMBLY WITH UOM OF 1						
	SUBTOTAL A112AB WIDEN SIDEWALKS TO 5Æ AT THE EAST ELEVATION		16,613	14,266	14,546	0	45,425
	MARKUP		*1.766*	*1.798*	*1.726*	*0.000*	*1.763*
	TOTAL A112AB WIDEN SIDEWALKS TO 5Æ AT THE EAST ELEVATION		29,343	25,655	25,108	0	80,106
	A112AC MODIFY EXTERIOR DOORWAYS AT THE EAST ELEVATI						
	A112AC11 MODIFY EXTERIOR DOORWAYS AT THE EAST ELEVATION	*LEVEL CONTRACTOR ID APPLIED--PRIME*					
	Doorway Modification		5777.00	1381.83	330.63	0.00	7,489.46
SUB-911/911	15.5 hrs/unit 47 TOTAL HRS	3.00 EA	17,331	4,146	992	0	22,468
	* LINE ITEM ASSEMBLY Factor:1.0000						
	Subtotal Direct Costs		17,331	4,146	992	0	22,468
	Subcontractor Markups		4,360	1,137	221	0	5,719
	Prime Contractor Markups		8,919	2,172	499	0	11,591
	TOTAL A112AC11 MODIFY EXTERIOR DOORWAYS AT THE EAST ELEVATION	47 HRS	30,611	7,455	1,712	0	39,778
	3.00 EA Level Unit Cost-->		*10,203.55*	*2,485.02*	*570.70*	*0.00*	*13,259.27*
	SUBTOTAL A112AC MODIFY EXTERIOR DOORWAYS AT THE EAST ELEVATI		17,331	4,146	992	0	22,468
	MARKUP		*1.766*	*1.798*	*1.726*	*0.000*	*1.770*
	TOTAL A112AC MODIFY EXTERIOR DOORWAYS AT THE EAST ELEVATION		30,611	7,455	1,712	0	39,778
	A112AD FLOOR MOUNTED HANDRAIL AT COURTYARD STEPS						
	A112AD11 FLOOR MOUNTED HANDRAIL AT COURTYARD STEPS	*LEVEL CONTRACTOR ID APPLIED--PRIME*					
	New Hand Rail		125.35	54.87	5.95	0.00	186.17
SUB-511/511	0.65 hrs/unit 8 TOTAL HRS	12.00 LF	1,504	658	71	0	2,234
	* LINE ITEM ASSEMBLY Factor:1.0000						
	Subtotal Direct Costs		1,504	658	71	0	2,234
	Subcontractor Markups		378	181	16	0	575
	Prime Contractor Markups		774	345	36	0	1,155
	TOTAL A112AD11 FLOOR MOUNTED HANDRAIL AT COURTYARD STEPS	8 HRS	2,657	1,184	123	0	3,964
	12.00 LF Level Unit Cost-->		*221.40*	*98.68*	*10.27*	*0.00*	*330.34*
	SUBTOTAL A112AD FLOOR MOUNTED HANDRAIL AT COURTYARD STEPS		1,504	658	71	0	2,234
	MARKUP		*1.766*	*1.798*	*1.726*	*0.000*	*1.774*
	TOTAL A112AD FLOOR MOUNTED HANDRAIL AT COURTYARD STEPS		2,657	1,184	123	0	3,964
	A112AE CONCRETE CURB OR A WELDED STEEL PLATE AT COU						
	A112AE11 CONCRETE CURB OR A WELDED STEEL PLATE AT COURTYARD RAMP (AP	*LEVEL CONTRACTOR ID APPLIED--PRIME*					
	Curb Replacement		68.67	111.49	19.84	0.00	200.00
SUB-311/311	1.15 hrs/unit 3 TOTAL HRS	3.00 LF	206	334	60	0	600
	* LINE ITEM ASSEMBLY Factor:1.0000						
	Subtotal Direct Costs		206	334	60	0	600
	Subcontractor Markups		52	92	13	0	157
	Prime Contractor Markups		106	175	30	0	311
	TOTAL A112AE11 CONCRETE CURB OR A WELDED STEEL PLATE AT COURTYARD RAMP (APPROX 3 LF)	3 HRS	364	601	103	0	1,068
	3.00 LF Level Unit Cost-->		*121.29*	*200.49*	*34.25*	*0.00*	*356.03*
	SUBTOTAL A112AE CONCRETE CURB OR A WELDED STEEL PLATE AT COU		206	334	60	0	600
	MARKUP		*1.766*	*1.798*	*1.726*	*0.000*	*1.780*
	TOTAL A112AE CONCRETE CURB OR A WELDED STEEL PLATE AT COURTY		364	601	103	0	1,068
	A112AF POST MOUNTED HORIZ RAIL OR A LANDSCAPE ELEME						
	A112AF11 POST MOUNTED HORIZ RAIL OR A LANDSCAPE ELEMENT (36 SF)	*LEVEL CONTRACTOR ID APPLIED--PRIME*					
	New Hand Rail		125.35	54.87	5.95	0.00	186.17
SUB-511/511	0.65 hrs/unit 4 TOTAL HRS	6.00 LF	752	329	36	0	1,117
	* LINE ITEM ASSEMBLY Factor:1.0000						
	Subtotal Direct Costs		752	329	36	0	1,117
	Subcontractor Markups		189	90	8	0	287
	Prime Contractor Markups		387	173	18	0	578
	TOTAL A112AF11 POST MOUNTED HORIZ RAIL OR A LANDSCAPE ELEMENT (36 SF)	4 HRS	1,328	592	62	0	1,982
	6.00 LF Level Unit Cost-->		*221.40*	*98.68*	*10.27*	*0.00*	*330.34*

CODE SUB/CREW	DESCRIPTION	QTY UM	TOTAL COSTS MATERIAL	LABOR	EQUIPMENT	UNIT COST (SUB QUOTE)	TOTAL
A112AF POST MOUNTED HORIZ RAIL OR A LANDSCAPE ELEME							
A112AF11	POST MOUNTED HORIZ RAIL OR A LANDSCAPE ELEMENT (36 SF)	*LEVEL CONTRACTOR ID APPLIED--PRIME*					
	SUBTOTAL A112AF POST MOUNTED HORIZ RAIL OR A LANDSCAPE ELEME		752	329	36	0	1,117
	MARKUP		*1.766*	*1.798*	*1.726*	*0.000*	*1.774*
	TOTAL A112AF POST MOUNTED HORIZ RAIL OR A LANDSCAPE ELEMENT		1,328	592	62	0	1,982
A112AG HANDRAILS FOR THE RAMP LEADING TO THE CMU A							
A112AG11	HANDRAILS FOR THE RAMP LEADING TO THE CMU ADDITION. (13 LF	*LEVEL CONTRACTOR ID APPLIED--PRIME*					
	New Hand Rail		125.35	54.87	5.95	0.00	186.17
	SUB-511/511 0.65 hrs/unit 17 TOTAL HRS	26.00 LF	3,259	1,427	155	0	4,840
	* LINE ITEM ASSEMBLY Factor:1.0000						
	Subtotal Direct Costs		3,259	1,427	155	0	4,840
	Subcontractor Markups		820	391	35	0	1,246
	Prime Contractor Markups		1,677	748	78	0	2,503
	TOTAL A112AG11 HANDRAILS FOR THE RAMP LEADING TO THE CMU 17 HRS		5,756	2,566	267	0	8,589
	ADDITION. (13 LF EACH SIDE)		*221.40*	*98.68*	*10.27*	*0.00*	*330.34*
	26.00 LF *Level Unit Cost-->*						
	SUBTOTAL A112AG HANDRAILS FOR THE RAMP LEADING TO THE CMU AD		3,259	1,427	155	0	4,840
	MARKUP		*1.766*	*1.798*	*1.726*	*0.000*	*1.774*
	TOTAL A112AG HANDRAILS FOR THE RAMP LEADING TO THE CMU ADDIT		5,756	2,566	267	0	8,589
A113 PLUMBING							
A113AA UPGRADE THE MENÆS ROOM ON 1ST FLOOR TO COMPL							
A113AA11	UPGRADE THE MENÆS ROOM ON 1ST FLOOR TO COMPLIANCE	*LEVEL CONTRACTOR ID APPLIED--PRIME*					
	Upgrade The MenÆS Room On 1St Floor To Compliance		125.35	44.08	20.49	0.00	189.92
	SUB-153/153 0.48 hrs/unit 65 TOTAL HRS	136.00 SF	17,048	5,994	2,787	0	25,829
	* LINE ITEM ASSEMBLY Factor:1.0000						
	Subtotal Direct Costs		17,048	5,994	2,787	0	25,829
	Subcontractor Markups		4,289	1,645	622	0	6,555
	Prime Contractor Markups		8,774	3,141	1,402	0	13,316
	TOTAL A113AA11 UPGRADE THE MENÆS ROOM ON 1ST FLOOR TO 65 HRS		30,110	10,780	4,810	0	45,700
	COMPLIANCE		*221.40*	*79.27*	*35.37*	*0.00*	*336.03*
	136.00 SF *Level Unit Cost-->*						
	SUBTOTAL A113AA UPGRADE THE MENÆS ROOM ON 1ST FLOOR TO COMPL		17,048	5,994	2,787	0	25,829
	MARKUP		*1.766*	*1.798*	*1.726*	*0.000*	*1.769*
	TOTAL A113AA UPGRADE THE MENÆS ROOM ON 1ST FLOOR TO COMPLIAN		30,110	10,780	4,810	0	45,700
A113AB UPGRADE WOMENÆS ROOM ON 2ND FLOOR TO COMPLI							
A113AB11	UPGRADE WOMENÆS ROOM ON 2ND FLOOR TO COMPLIANCE	*LEVEL CONTRACTOR ID APPLIED--PRIME*					
	Upgrade The WomenÆS Room On 1St Floor To Compliance		125.35	44.08	20.49	0.00	189.92
	SUB-153/153 0.48 hrs/unit 55 TOTAL HRS	115.00 SF	14,415	5,069	2,356	0	21,840
	* LINE ITEM ASSEMBLY Factor:1.0000						
	Subtotal Direct Costs		14,415	5,069	2,356	0	21,840
	Subcontractor Markups		3,627	1,391	526	0	5,543
	Prime Contractor Markups		7,419	2,656	1,185	0	11,260
	TOTAL A113AB11 UPGRADE WOMENÆS ROOM ON 2ND FLOOR TO 55 HRS		25,461	9,116	4,067	0	38,644
	COMPLIANCE		*221.40*	*79.27*	*35.37*	*0.00*	*336.03*
	115.00 SF *Level Unit Cost-->*						
	SUBTOTAL A113AB UPGRADE WOMENÆS ROOM ON 2ND FLOOR TO COMPLI		14,415	5,069	2,356	0	21,840
	MARKUP		*1.766*	*1.798*	*1.726*	*0.000*	*1.769*
	TOTAL A113AB UPGRADE WOMENÆS ROOM ON 2ND FLOOR TO COMPLIANC		25,461	9,116	4,067	0	38,644
A113AC ADD UNISEX SINGLE RESTROOM AT 1ST FLOOR							
A113AC11	ADD UNISEX SINGLE RESTROOM AT 1ST FLOOR	*LEVEL CONTRACTOR ID APPLIED--PRIME*					
	Add Unisex Single Restroom At 1St Floor		125.35	44.08	20.49	0.00	189.92
	SUB-153/153 0.48 hrs/unit 86 TOTAL HRS	180.00 SF	22,563	7,934	3,688	0	34,185
	* LINE ITEM ASSEMBLY Factor:1.0000						

CODE SUB/CREW	DESCRIPTION	QTY UM	TOTAL COSTS MATERIAL	LABOR	EQUIPMENT	UNIT COST (SUB QUOTE)	TOTAL
A113AC	**ADD UNISEX SINGLE RESTROOM AT 1ST FLOOR**						
A113AC11	ADD UNISEX SINGLE RESTROOM AT 1ST FLOOR *LEVEL CONTRACTOR ID APPLIED--PRIME*						
	Subtotal Direct Costs		22,563	7,934	3,688	0	34,185
	Subcontractor Markups		5,676	2,177	823	0	8,676
	Prime Contractor Markups		11,612	4,157	1,855	0	17,625
	TOTAL A113AC11 ADD UNISEX SINGLE RESTROOM AT 1ST FLOOR	86 HRS	39,852	14,268	6,366	0	60,486
	180.00 SF *Level Unit Cost-->*		*221.40*	*79.27*	*35.37*	*0.00*	*336.03*
	SUBTOTAL A113AC ADD UNISEX SINGLE RESTROOM AT 1ST FLOOR		22,563	7,934	3,688	0	34,185
	MARKUP		*1.766*	*1.798*	*1.726*	*0.000*	*1.769*
	TOTAL A113AC ADD UNISEX SINGLE RESTROOM AT 1ST FLOOR		39,852	14,268	6,366	0	60,486
A113AD	**ADD UNISEX SINGLE RESTROOM AT 2ND FLOOR**						
A113AD11	ADD UNISEX SINGLE RESTROOM AT 2ND FLOOR *LEVEL CONTRACTOR ID APPLIED--PRIME*						
	Add Unisex Single Restroom At 2Nd Floor		125.35	44.08	20.49	0.00	189.92
	SUB-153/153 0.48 hrs/unit	1.00 SF	125	44	20	0	190
	* LINE ITEM ASSEMBLY Factor:1.0000						
	Subtotal Direct Costs		125	44	20	0	190
	Subcontractor Markups		32	12	5	0	48
	Prime Contractor Markups		65	23	10	0	98
	TOTAL A113AD11 ADD UNISEX SINGLE RESTROOM AT 2ND FLOOR	HR	221	79	35	0	336
	SUBTOTAL A113AD ADD UNISEX SINGLE RESTROOM AT 2ND FLOOR		125	44	20	0	190
	MARKUP		*1.766*	*1.798*	*1.726*	*0.000*	*1.769*
	TOTAL A113AD ADD UNISEX SINGLE RESTROOM AT 2ND FLOOR		221	79	35	0	336
A113AE	**CODE COMPLIANT SIGNS FOR RESTROOMS**						
A113AE11	CODE COMPLIANT SIGNS FOR RESTROOMS *LEVEL CONTRACTOR ID APPLIED--PRIME*						
	Code Compliant Signs For Restrooms		141.70	25.96	4.63	0.00	172.29
	SUB-823/823 0.25 hrs/unit 1 TOTAL HRS	4.00 EA	567	104	19	0	689
	* LINE ITEM ASSEMBLY Factor:1.0000						
	Subtotal Direct Costs		567	104	19	0	689
	Subcontractor Markups		143	28	4	0	175
	Prime Contractor Markups		292	54	9	0	355
	TOTAL A113AE11 CODE COMPLIANT SIGNS FOR RESTROOMS	1 HR	1,001	187	32	0	1,220
	4.00 EA *Level Unit Cost-->*		*250.28*	*46.68*	*7.99*	*0.00*	*304.95*
	SUBTOTAL A113AE CODE COMPLIANT SIGNS FOR RESTROOMS		567	104	19	0	689
	MARKUP		*1.766*	*1.798*	*1.726*	*0.000*	*1.770*
	TOTAL A113AE CODE COMPLIANT SIGNS FOR RESTROOMS		1,001	187	32	0	1,220
A113AF	**WALL MOUNTED DRINKING FOUNTAIN AT 1ST FLOOR**						
A113AF11	WALL MOUNTED DRINKING FOUNTAIN AT 1ST FLOOR IN A NEW ALCOVE *LEVEL CONTRACTOR ID APPLIED--PRIME*						
	Mounted Drinking Fountain At 1St Floor In A New Alcove		3379.00	505.05	244.66	0.00	4,128.71
	SUB-153/153 5.5 hrs/unit 6 TOTAL HRS	1.00 EA	3,379	505	245	0	4,129
	* LINE ITEM ASSEMBLY Factor:1.0000						
	Subtotal Direct Costs		3,379	505	245	0	4,129
	Subcontractor Markups		850	139	55	0	1,043
	Prime Contractor Markups		1,739	265	123	0	2,127
	TOTAL A113AF11 WALL MOUNTED DRINKING FOUNTAIN AT 1ST FLOOR IN A NEW ALCOVE	6 HRS	5,968	908	422	0	7,299
	SUBTOTAL A113AF WALL MOUNTED DRINKING FOUNTAIN AT 1ST FLOOR		3,379	505	245	0	4,129
	MARKUP		*1.766*	*1.798*	*1.726*	*0.000*	*1.768*
	TOTAL A113AF WALL MOUNTED DRINKING FOUNTAIN AT 1ST FLOOR IN		5,968	908	422	0	7,299
A113AG	**PLUMBING INFRASTRUCTURE**						
A113AG11	PLUMBING INFRASTRUCTURE *LEVEL CONTRACTOR ID APPLIED--PRIME*						
	* LEVEL IS AN ASSEMBLY WITH UOM OF 1						
	Replace Sewer Line And Run New To All Spaces		69.22	32.14	23.81	0.00	125.16
	SUB-153/153 0.35 hrs/unit 245 TOTAL HRS	700.00 LF	48,451	22,498	16,667	0	87,615

CODE SUB/CREW	DESCRIPTION	QTY UM	TOTAL COSTS MATERIAL	LABOR	EQUIPMENT	UNIT COST (SUB QUOTE)	TOTAL
A113AG PLUMBING INFRASTRUCTURE							
A113AG11 PLUMBING INFRASTRUCTURE	*LEVEL CONTRACTOR ID APPLIED--PRIME*						
* LEVEL IS AN ASSEMBLY WITH UOM OF 1							
	Subtotal Direct Costs		48,451	22,498	16,667	0	87,615
	Subcontractor Markups		12,189	6,172	3,719	0	22,080
	Prime Contractor Markups		24,935	11,789	8,383	0	45,107
TOTAL A113AG11 PLUMBING INFRASTRUCTURE		245 HRS	85,575	40,459	28,769	0	154,803
15,434.00 BSF	*Level Unit Cost-->*		*5.54*	*2.62*	*1.86*	*0.00*	*10.03*
SUBTOTAL A113AG PLUMBING INFRASTRUCTURE			48,451	22,498	16,667	0	87,615
MARKUP			*1.766*	*1.798*	*1.726*	*0.000*	*1.767*
TOTAL A113AG PLUMBING INFRASTRUCTURE			85,575	40,459	28,769	0	154,803
A114 STAIRS AND BALCONY RAILING							
A114AA ADD A SOLID OR PERFORATED STEEL PANEL AT EAC							
A114AA11 ADD A SOLID OR PERFORATED STEEL PANEL AT EACH OPEN RISER	*LEVEL CONTRACTOR ID APPLIED--PRIME*						
	Add A Solid Or Perforated Steel Panel At Each Open Riser		68.67	29.55	8.59	0.00	106.81
	SUB-511/511 0.35 hrs/unit 14 TOTAL HRS 40.00 EA		2,747	1,182	344	0	4,272
	* LINE ITEM ASSEMBLY Factor:1.0000						
	Subtotal Direct Costs		2,747	1,182	344	0	4,272
	Subcontractor Markups		691	324	77	0	1,092
	Prime Contractor Markups		1,414	619	173	0	2,206
TOTAL A114AA11 ADD A SOLID OR PERFORATED STEEL PANEL AT EACH OPEN RISER		14 HRS	4,852	2,125	593	0	7,570
40.00 RISERS	*Level Unit Cost-->*		*121.29*	*53.13*	*14.83*	*0.00*	*189.25*
SUBTOTAL A114AA ADD A SOLID OR PERFORATED STEEL PANEL AT EAC			2,747	1,182	344	0	4,272
MARKUP			*1.766*	*1.798*	*1.726*	*0.000*	*1.772*
TOTAL A114AA ADD A SOLID OR PERFORATED STEEL PANEL AT EACH O			4,852	2,125	593	0	7,570
A114AB ADD CONTRASTING STRIPE AT EACH RISER							
A114AB11 ADD CONTRASTING STRIPE AT EACH RISER	*LEVEL CONTRACTOR ID APPLIED--PRIME*						
	Add Contrasting Stripe At Each Riser		779.35	15.57	1.99	0.00	796.92
	SUB-823/823 0.15 hrs/unit 6 TOTAL HRS 40.00 EA		31,174	623	80	0	31,877
	* LINE ITEM ASSEMBLY Factor:1.0000						
	Subtotal Direct Costs		31,174	623	80	0	31,877
	Subcontractor Markups		7,843	171	18	0	8,032
	Prime Contractor Markups		16,044	326	40	0	16,410
TOTAL A114AB11 ADD CONTRASTING STRIPE AT EACH RISER		6 HRS	55,061	1,120	137	0	56,318
40.00 EA	*Level Unit Cost-->*		*1,376.52*	*28.01*	*3.43*	*0.00*	*1,407.96*
SUBTOTAL A114AB ADD CONTRASTING STRIPE AT EACH RISER			31,174	623	80	0	31,877
MARKUP			*1.766*	*1.798*	*1.726*	*0.000*	*1.767*
TOTAL A114AB ADD CONTRASTING STRIPE AT EACH RISER			55,061	1,120	137	0	56,318
A114AC REPLACE EXISTING STEEL GUARDRAILS WITH NEW O							
A114AC11 REPLACE EXISTING STEEL GUARDRAILS WITH NEW ONES	*LEVEL CONTRACTOR ID APPLIED--PRIME*						
* LEVEL IS AN ASSEMBLY WITH UOM OF 1							
	New Hand Rail		125.35	54.87	5.95	0.00	186.17
	SUB-511/511 0.65 hrs/unit 114 TOTAL HRS 175.00 LF		21,936	9,602	1,041	0	32,580
	* LINE ITEM ASSEMBLY Factor:1.0000						
	Subtotal Direct Costs		21,936	9,602	1,041	0	32,580
	Subcontractor Markups		5,519	2,634	232	0	8,385
	Prime Contractor Markups		11,290	5,032	524	0	16,845
TOTAL A114AC11 REPLACE EXISTING STEEL GUARDRAILS WITH NEW ONES		114 HRS	38,745	17,268	1,797	0	57,810
175.00 LF	*Level Unit Cost-->*		*221.40*	*98.68*	*10.27*	*0.00*	*330.34*
SUBTOTAL A114AC REPLACE EXISTING STEEL GUARDRAILS WITH NEW O			21,936	9,602	1,041	0	32,580
MARKUP			*1.766*	*1.798*	*1.726*	*0.000*	*1.774*
TOTAL A114AC REPLACE EXISTING STEEL GUARDRAILS WITH NEW ONES			38,745	17,268	1,797	0	57,810

CODE SUB/CREW	DESCRIPTION	QTY UM	TOTAL COSTS MATERIAL	LABOR	EQUIPMENT	UNIT COST (SUB QUOTE)	TOTAL
A114AD	**REPLACE EXISTING 2ND FLOOR BALCONY GUARDRAIL**						
A114AD11	REPLACE EXISTING 2ND FLOOR BALCONY GUARDRAILS *LEVEL CONTRACTOR ID APPLIED--PRIME*						
	New Hand Rail		125.35	54.87	5.95	0.00	186.17
SUB-511/511	0.65 hrs/unit 128 TOTAL HRS	197.00 LF	24,694	10,809	1,172	0	36,676
	* LINE ITEM ASSEMBLY Factor:1.0000						
	Subtotal Direct Costs		24,694	10,809	1,172	0	36,676
	Subcontractor Markups		6,213	2,965	262	0	9,440
	Prime Contractor Markups		12,709	5,664	590	0	18,963
	TOTAL A114AD11 REPLACE EXISTING 2ND FLOOR BALCONY GUARDRAILS	128 HRS	43,615	19,439	2,023	0	65,078
	197.00 LF *Level Unit Cost-->*		*221.40*	*98.68*	*10.27*	*0.00*	*330.34*
	SUBTOTAL A114AD REPLACE EXISTING 2ND FLOOR BALCONY GUARDRAIL		24,694	10,809	1,172	0	36,676
	MARKUP		*1.766*	*1.798*	*1.726*	*0.000*	*1.774*
	TOTAL A114AD REPLACE EXISTING 2ND FLOOR BALCONY GUARDRAILS		43,615	19,439	2,023	0	65,078
A114AE	**WALL MOUNTED HANDRAIL AT EA OF 4 STAIRS BETW**						
A114AE11	WALL MOUNTED HANDRAIL AT EA OF 4 STAIRS BETWEEN 2ND FLOOR L *LEVEL CONTRACTOR ID APPLIED--PRIME*						
	New Hand Rai Wall Mountl		92.65	40.52	5.95	0.00	139.12
SUB-511/511	0.48 hrs/unit 58 TOTAL HRS	120.00 LF	11,118	4,862	714	0	16,694
	* LINE ITEM ASSEMBLY Factor:1.0000						
	Subtotal Direct Costs		11,118	4,862	714	0	16,694
	Subcontractor Markups		2,797	1,334	159	0	4,290
	Prime Contractor Markups		5,722	2,548	359	0	8,629
	TOTAL A114AE11 WALL MOUNTED HANDRAIL AT EA OF 4 STAIRS BETWEEN 2ND FLOOR LEVELS	58 HRS	19,637	8,744	1,232	0	29,614
	120.00 LF *Level Unit Cost-->*		*163.64*	*72.87*	*10.27*	*0.00*	*246.78*
	SUBTOTAL A114AE WALL MOUNTED HANDRAIL AT EA OF 4 STAIRS BETW		11,118	4,862	714	0	16,694
	MARKUP		*1.766*	*1.798*	*1.726*	*0.000*	*1.774*
	TOTAL A114AE WALL MOUNTED HANDRAIL AT EA OF 4 STAIRS BETWEEN		19,637	8,744	1,232	0	29,614
A115	**VERTICAL TRANSPORTATION**						
A115AA	**DEVELOP VERTICAL TRANSPORTATION**						
A115AA11	ADD 2 EA -2-DOOR ELEVATORS W/ 2 STOPS *LEVEL CONTRACTOR ID APPLIED--PRIME*						
	Elevators Two Door Two Stop		80115.00	27739.15	4628.75	0.00	112,482.90
SUB-141/141	215 hrs/unit 860 TOTAL HRS	4.00 STPS	320,460	110,957	18,515	0	449,932
	* LINE ITEM ASSEMBLY Factor:2.0000						
	Add Backup Generator		147150.00	12799.79	3306.25	0.00	163,256.04
SUB-161/161	120 hrs/unit 120 TOTAL HRS	1.00 EA	147,150	12,800	3,306	0	163,256
	Subtotal Direct Costs		467,610	123,756	21,821	0	613,188
	Subcontractor Markups		117,643	33,951	4,869	0	156,463
	Prime Contractor Markups		240,658	64,850	10,975	0	316,483
	TOTAL A115AA11 ADD 2 EA -2-DOOR ELEVATORS W/ 2 STOPS	980 HRS	825,910	222,557	37,666	0	1,086,133
	2.00 EA *Level Unit Cost-->*		*412,955.09*	*111,278.69*	*18,832.78*	*0.00*	*543,066.56*
	SUBTOTAL A115AA DEVELOP VERTICAL TRANSPORTATION		467,610	123,756	21,821	0	613,188
	MARKUP		*1.766*	*1.798*	*1.726*	*0.000*	*1.771*
	TOTAL A115AA DEVELOP VERTICAL TRANSPORTATION		825,910	222,557	37,666	0	1,086,133
A115AB	**ADD TWO EXTERIOR AREAS OF ASSISTED RESCUE AL**						
A115AB11	ADD TWO EXTERIOR AREAS OF ASSISTED RESCUE ALONG THE 2ND FLO *LEVEL CONTRACTOR ID APPLIED--PRIME*						
	Add Two Exterior Areas Of Assisted Rescue		92.65	29.55	11.25	0.00	133.45
SUB-511/511	0.35 hrs/unit 53 TOTAL HRS	150.00 SF	13,898	4,432	1,688	0	20,017
	* LINE ITEM ASSEMBLY Factor:1.0000						
	Subtotal Direct Costs		13,898	4,432	1,688	0	20,017
	Subcontractor Markups		3,496	1,216	377	0	5,089
	Prime Contractor Markups		7,152	2,322	849	0	10,323
	TOTAL A115AB11 ADD TWO EXTERIOR AREAS OF ASSISTED RESCUE ALONG THE 2ND FLOOR BALCONY	53 HRS	24,546	7,970	2,913	0	35,429
	150.00 SF *Level Unit Cost-->*		*163.64*	*53.13*	*19.42*	*0.00*	*236.19*
	SUBTOTAL A115AB ADD TWO EXTERIOR AREAS OF ASSISTED RESCUE AL		13,898	4,432	1,688	0	20,017
	MARKUP		*1.766*	*1.798*	*1.726*	*0.000*	*1.770*
	TOTAL A115AB ADD TWO EXTERIOR AREAS OF ASSISTED RESCUE ALONG		24,546	7,970	2,913	0	35,429

CODE SUB/CREW	DESCRIPTION	QTY UM	TOTAL COSTS MATERIAL	LABOR	EQUIPMENT	UNIT COST (SUB QUOTE)	TOTAL
A115AB	**ADD TWO EXTERIOR AREAS OF ASSISTED RESCUE AL**						
A115AB11	ADD TWO EXTERIOR AREAS OF ASSISTED RESCUE ALONG THE 2ND FLO *LEVEL CONTRACTOR ID APPLIED--PRIME*						
A116	**TENANT SPACE**						
	REF COMPLETE						
A116AA	**WIDEN ALL TENANT DOORWAYS**						
A116AA11	WIDEN ALL TENANT DOORWAYS *LEVEL CONTRACTOR ID APPLIED--PRIME*						
	Doorway Modification		2016.50	757.78	178.54	0.00	2,952.82
SUB-911/911	8.5 hrs/unit 340 TOTAL HRS	40.00 EA	80,660	30,311	7,142	0	118,113
	* LINE ITEM ASSEMBLY Factor:1.0000						
	Subtotal Direct Costs		80,660	30,311	7,142	0	118,113
	Subcontractor Markups		20,293	8,316	1,594	0	30,202
	Prime Contractor Markups		41,512	15,883	3,592	0	60,987
	TOTAL A116AA11 WIDEN ALL TENANT DOORWAYS	340 HRS	142,465	54,510	12,327	0	209,302
	40.00 EA *Level Unit Cost-->*		*3,561.62*	*1,362.75*	*308.18*	*0.00*	*5,232.55*
	SUBTOTAL A116AA WIDEN ALL TENANT DOORWAYS		80,660	30,311	7,142	0	118,113
	MARKUP		*1.766*	*1.798*	*1.726*	*0.000*	*1.772*
	TOTAL A116AA WIDEN ALL TENANT DOORWAYS		142,465	54,510	12,327	0	209,302
A116AB	**MODIFY LANDING TO NECESSARY DOORS**						
A116AB11	MODIFY LANDING TO NECESSARY DOORS *LEVEL CONTRACTOR ID APPLIED--PRIME*						
	Modify Landing To Necessary Doors		9973.50	5191.79	1719.25	0.00	16,884.54
SUB-823/823	50 hrs/unit 50 TOTAL HRS	1.00 ALW	9,974	5,192	1,719	0	16,885
	* LINE ITEM ASSEMBLY Factor:1.0000						
	Subtotal Direct Costs		9,974	5,192	1,719	0	16,885
	Subcontractor Markups		2,509	1,424	384	0	4,317
	Prime Contractor Markups		5,133	2,721	865	0	8,718
	TOTAL A116AB11 MODIFY LANDING TO NECESSARY DOORS	50 HRS	17,616	9,337	2,968	0	29,920
	SUBTOTAL A116AB MODIFY LANDING TO NECESSARY DOORS		9,974	5,192	1,719	0	16,885
	MARKUP		*1.766*	*1.798*	*1.726*	*0.000*	*1.772*
	TOTAL A116AB MODIFY LANDING TO NECESSARY DOORS		17,616	9,337	2,968	0	29,920
A116AC	PROVIDE HANDRAILS FOR TENANT INTERIOR STEPS *LEVEL CONTRACTOR ID APPLIED--PRIME*						
	LEVELS IN THE SAME BRANCH BELOW THIS LEVEL CONTAIN DETAIL LINE ITEMS; ALL LINE ITEMS IN THE SAME BRANCH MUST BE AT ONLY ONE LEVEL!!						
	Provide Handrails For Tenant Interior Steps		0.00	0.00	0.00	0.00	0.00
NoSub/NoCrew		240.00 LF	0	0	0	0	0
	* LINE ITEM ASSEMBLY Factor:16.0000						
	Subtotal Direct Costs		0	0	0	0	0
	Rollup from Child Levels		16,677	7,294	1,071	0	25,042
	Subcontractor Markups		4,196	2,001	239	0	6,436
	Prime Contractor Markups		8,583	3,822	539	0	12,943
	TOTAL A116AC PROVIDE HANDRAILS FOR TENANT INTERIOR STEPS		29,456	13,116	1,849	0	44,420
	15.00 EA *Level Unit Cost-->*		*1,963.70*	*874.42*	*123.24*	*0.00*	*2,961.36*

THIS WBS CODE DOES NOT FOLLOW TRI-SERVICE NUMBERING SYSTEM. MODIFY CODE TO MATCH EXISTING WBS, OR USE THE A1 XX 9? or A1 XX 8? NUMBERING CONVENTION T

	SUBTOTAL A116 TENANT SPACE		852,577	451,272	113,397	0	1,417,246
	MARKUP		*1.766*	*1.798*	*1.726*	*0.000*	*1.773*
	TOTAL A116 TENANT SPACE		1,505,853	811,545	195,734	0	2,513,133
A116AC	**PROVIDE HANDRAILS FOR TENANT INTERIOR STEPS**						
A116AC11	PROVIDE HANDRAILS FOR TENANT INTERIOR STEPS *LEVEL CONTRACTOR ID APPLIED--PRIME*						
	New Hand Rail Wall Mount		92.65	40.52	5.95	0.00	139.12
SUB-511/511	0.48 hrs/unit 86 TOTAL HRS	180.00 LF	16,677	7,294	1,071	0	25,042
	* LINE ITEM ASSEMBLY Factor:12.0000						
	Subtotal Direct Costs		16,677	7,294	1,071	0	25,042
	Subcontractor Markups		4,196	2,001	239	0	6,436
	Prime Contractor Markups		8,583	3,822	539	0	12,943
	TOTAL A116AC11 PROVIDE HANDRAILS FOR TENANT INTERIOR STE863HRS		29,456	13,116	1,849	0	44,420
	15.00 EA *Level Unit Cost-->*		*1,963.70*	*874.42*	*123.24*	*0.00*	*2,961.36*

CODE SUB/CREW	DESCRIPTION	QTY UM	TOTAL COSTS MATERIAL	LABOR	EQUIPMENT	UNIT COST (SUB QUOTE)	TOTAL
A116AC	**PROVIDE HANDRAILS FOR TENANT INTERIOR STEPS**						
A116AC11	PROVIDE HANDRAILS FOR TENANT INTERIOR STEPS *LEVEL CONTRACTOR ID APPLIED--PRIME*						
	SUBTOTAL A116AC PROVIDE HANDRAILS FOR TENANT INTERIOR STEPS		16,677	7,294	1,071	0	25,042
	MARKUP		*1.766*	*1.798*	*1.726*	*0.000*	*1.774*
	TOTAL A116AC PROVIDE HANDRAILS FOR TENANT INTERIOR STEPS		29,456	13,116	1,849	0	44,420
A116AD	**REPLACE DOOR & FRAME FOR DOORS LESS THAN 34"**						
A116AD11	REPLACE DOOR & FRAME FOR DOORS LESS THAN 34" W *LEVEL CONTRACTOR ID APPLIED--PRIME*						
	Replace Door & Frame For Doors Less Than 34" W		1962.00	757.78	178.54	0.00	2,898.32
	SUB-911/911 8.5 hrs/unit 255 TOTAL HRS	30.00 EA	58,860	22,733	5,356	0	86,950
	* LINE ITEM ASSEMBLY Factor:1.0000						
	Subtotal Direct Costs		58,860	22,733	5,356	0	86,950
	Subcontractor Markups		14,808	6,237	1,195	0	22,240
	Prime Contractor Markups		30,293	11,913	2,694	0	44,899
	TOTAL A116AD11 REPLACE DOOR & FRAME FOR DOORS LESS TH 255 HRS		103,961	40,883	9,245	0	154,089
	34" W		*3,465.36*	*1,362.75*	*308.18*	*0.00*	*5,136.29*
	30.00 EA *Level Unit Cost-->*						
	SUBTOTAL A116AD REPLACE DOOR & FRAME FOR DOORS LESS THAN 34"		58,860	22,733	5,356	0	86,950
	MARKUP		*1.766*	*1.798*	*1.726*	*0.000*	*1.772*
	TOTAL A116AD REPLACE DOOR & FRAME FOR DOORS LESS THAN 34" W		103,961	40,883	9,245	0	154,089
A116AE	**MODIFY & REINSTALL NECESSARY DOORS TO OPEN 9**						
A116AE11	MODIFY & REINSTALL NECESSARY DOORS TO OPEN 90 DEGREES *LEVEL CONTRACTOR ID APPLIED--PRIME*						
	Reinstall Doors		686.70	467.26	59.51	0.00	1,213.47
	SUB-823/823 4.5 hrs/unit 113 TOTAL HRS	25.00 EA	17,168	11,682	1,488	0	30,337
	* LINE ITEM ASSEMBLY Factor:1.0000						
	Subtotal Direct Costs		17,168	11,682	1,488	0	30,337
	Subcontractor Markups		4,319	3,205	332	0	7,856
	Prime Contractor Markups		8,835	6,121	748	0	15,705
	TOTAL A116AE11 MODIFY & REINSTALL NECESSARY DOORS TO OP 113 HRS		30,322	21,007	2,568	0	53,897
	90 DEGREES		*1,212.88*	*840.30*	*102.72*	*0.00*	*2,155.89*
	25.00 EA *Level Unit Cost-->*						
	SUBTOTAL A116AE MODIFY & REINSTALL NECESSARY DOORS TO OPEN 9		17,168	11,682	1,488	0	30,337
	MARKUP		*1.766*	*1.798*	*1.726*	*0.000*	*1.777*
	TOTAL A116AE MODIFY & REINSTALL NECESSARY DOORS TO OPEN 90 D		30,322	21,007	2,568	0	53,897
A116AF	**PROVIDE CODE COMPLIANT SIGNS FOR TENANT ENTR**						
A116AF11	PROVIDE CODE COMPLIANT SIGNS FOR TENANT ENTRY DOOR *LEVEL CONTRACTOR ID APPLIED--PRIME*						
	Code Compliant Signs For Restrooms		141.70	25.96	4.63	0.00	172.29
	SUB-823/823 0.25 hrs/unit 10 TOTAL HRS	40.00 EA	5,668	1,038	185	0	6,892
	* LINE ITEM ASSEMBLY Factor:1.0000						
	Subtotal Direct Costs		5,668	1,038	185	0	6,892
	Subcontractor Markups		1,426	285	41	0	1,752
	Prime Contractor Markups		2,917	544	93	0	3,554
	TOTAL A116AF11 PROVIDE CODE COMPLIANT SIGNS FOR TENANT 10 HRS		10,011	1,867	320	0	12,198
	ENTRY DOOR		*250.28*	*46.68*	*7.99*	*0.00*	*304.95*
	40.00 EA *Level Unit Cost-->*						
	SUBTOTAL A116AF PROVIDE CODE COMPLIANT SIGNS FOR TENANT ENTR		5,668	1,038	185	0	6,892
	MARKUP		*1.766*	*1.798*	*1.726*	*0.000*	*1.770*
	TOTAL A116AF PROVIDE CODE COMPLIANT SIGNS FOR TENANT ENTRY D		10,011	1,867	320	0	12,198
A116AG	**LEVER DOOR HANDLES**						
A116AG11	LEVER DOOR HANDLES *LEVEL CONTRACTOR ID APPLIED--PRIME*						
	Lever Door Handles - Replace Door Hardware		218.00	15.57	4.63	0.00	238.21
	SUB-823/823 0.15 hrs/unit 11 TOTAL HRS	75.00 EA	16,350	1,168	347	0	17,865
	* LINE ITEM ASSEMBLY Factor:1.0000						
	Subtotal Direct Costs		16,350	1,168	347	0	17,865
	Subcontractor Markups		4,113	320	77	0	4,511
	Prime Contractor Markups		8,415	612	175	0	9,201
	TOTAL A116AG11 LEVER DOOR HANDLES 11 HRS		28,878	2,101	599	0	31,578
	75.00 EA *Level Unit Cost-->*		*385.04*	*28.01*	*7.99*	*0.00*	*421.04*

CODE SUB/CREW	DESCRIPTION	QTY UM	TOTAL COSTS MATERIAL	LABOR	EQUIPMENT	UNIT COST (SUB QUOTE)	TOTAL
A116AG LEVER DOOR HANDLES							
A116AG11 LEVER DOOR HANDLES	*LEVEL CONTRACTOR ID APPLIED--PRIME*						
	SUBTOTAL A116AG LEVER DOOR HANDLES		16,350	1,168	347	0	17,865
	MARKUP		*1.766*	*1.798*	*1.726*	*0.000*	*1.768*
	TOTAL A116AG LEVER DOOR HANDLES		28,878	2,101	599	0	31,578
A116AH WINDOW REPLACEMENT							
A116AH11 WINDOW REPLACEMENT + 10 OPENABLE WINDOWS	*LEVEL CONTRACTOR ID APPLIED--PRIME*						
	Replace At Least 1 Window W/ Operating Parts		817.50	368.86	85.96	0.00	1,272.32
SUB-823/824	3.5 hrs/unit 35 TOTAL HRS	10.00 EA	8,175	3,689	860	0	12,723
	Replace Exterior Windows With Low E Dual Glazed		91.56	26.35	11.25	0.00	129.16
SUB-824/824	0.25 hrs/unit 550 TOTAL HRS	2,200.00 SF	201,432	57,964	24,750	0	284,146
	Subtotal Direct Costs		209,607	61,652	25,610	0	296,869
	Subcontractor Markups		52,733	16,914	5,714	0	75,362
	Prime Contractor Markups		107,875	32,306	12,881	0	153,062
	TOTAL A116AH11 WINDOW REPLACEMENT + 10 OPENABLE WINDOWS	585 HRS	370,216	110,872	44,205	0	525,293
	2,200.00 SF *Level Unit Cost-->*		*168.28*	*50.40*	*20.09*	*0.00*	*238.77*
	SUBTOTAL A116AH WINDOW REPLACEMENT		209,607	61,652	25,610	0	296,869
	MARKUP		*1.766*	*1.798*	*1.726*	*0.000*	*1.769*
	TOTAL A116AH WINDOW REPLACEMENT		370,216	110,872	44,205	0	525,293
A116AI REPLACE EXTERIOR WALL FINISHES							
A116AI11 REPLACE EXTERIOR WALL FINISHES	*LEVEL CONTRACTOR ID APPLIED--PRIME*						
	Insulate Building Perimeter		1.47	1.52	0.46	0.00	3.45
SUB-911/911	0.017 hrs/unit 1070 TOTAL HRS	62,928.00 SF	92,599	95,371	28,947	0	216,917
	* LINE ITEM ASSEMBLY Factor:1.0000						
	Drywall		4.23	2.50	0.46	0.00	7.19
SUB-911/911	0.028 hrs/unit 1762 TOTAL HRS	62,928.00 SF	266,135	157,082	28,947	0	452,164
	* LINE ITEM ASSEMBLY Factor:1.0000						
	Paint		1.25	0.92	0.20	0.00	2.37
SUB-991/991	0.012 hrs/unit 755 TOTAL HRS	62,928.00 SF	78,880	57,749	12,586	0	149,215
	* LINE ITEM ASSEMBLY Factor:1.0000						
	Subtotal Direct Costs		437,614	310,202	70,479	0	818,295
	Subcontractor Markups		110,096	85,100	15,727	0	210,923
	Prime Contractor Markups		225,220	162,549	35,448	0	423,218
	TOTAL A116AI11 REPLACE EXTERIOR WALL FINISHES	3,587 HRS	772,930	557,852	121,654	0	1,452,436
	62,928.00 SF *Level Unit Cost-->*		*12.28*	*8.86*	*1.93*	*0.00*	*23.08*
	SUBTOTAL A116AI REPLACE EXTERIOR WALL FINISHES		437,614	310,202	70,479	0	818,295
	MARKUP		*1.766*	*1.798*	*1.726*	*0.000*	*1.775*
	TOTAL A116AI REPLACE EXTERIOR WALL FINISHES		772,930	557,852	121,654	0	1,452,436
A117 ABATEMENT							
REF COMPLETE							
A117AA ABATEMENT							
A117AA11 ABATEMENT - ASBESTOUS	*LEVEL CONTRACTOR ID APPLIED--PRIME*						
* LEVEL IS AN ASSEMBLY WITH UOM OF 1							
	Abatement - Asbestous		6.87	5.19	1.13	0.00	13.19
SUB-221/221	0.052 hrs/unit 803 TOTAL HRS	15,434.00 BSF	105,985	80,137	17,440	0	203,563
	* LINE ITEM ASSEMBLY Factor:1.0000						
	Subtotal Direct Costs		105,985	80,137	17,440	0	203,563
	Subcontractor Markups		26,664	21,985	3,892	0	52,540
	Prime Contractor Markups		54,546	41,993	8,772	0	105,310
	TOTAL A117AA11 ABATEMENT - ASBESTOUS	803 HRS	187,195	144,115	30,104	0	361,414
	15,434.00 BSF *Level Unit Cost-->*		*12.13*	*9.34*	*1.95*	*0.00*	*23.42*
A117AA12 ABATEMENT - LEAD PAINT	*LEVEL CONTRACTOR ID APPLIED--PRIME*						
* LEVEL IS AN ASSEMBLY WITH UOM OF 1							
	Abatement - Lead Paint		4.91	3.19	1.13	0.00	9.23
SUB-221/221	0.032 hrs/unit 494 TOTAL HRS	15,434.00 BSF	75,704	49,315	17,440	0	142,459
	* LINE ITEM ASSEMBLY Factor:1.0000						

CODE SUB/CREW	DESCRIPTION	QTY UM	TOTAL COSTS MATERIAL	LABOR	EQUIPMENT	UNIT COST (SUB QUOTE)	TOTAL
A117AA ABATEMENT							
A117AA12 ABATEMENT - LEAD PAINT	*LEVEL CONTRACTOR ID APPLIED--PRIME*						
* LEVEL IS AN ASSEMBLY WITH UOM OF 1							
	Subtotal Direct Costs		75,704	49,315	17,440	0	142,459
	Subcontractor Markups		19,046	13,529	3,892	0	36,466
	Prime Contractor Markups		38,961	25,842	8,772	0	73,575
TOTAL A117AA12 ABATEMENT - LEAD PAINT		494 HRS	133,711	88,686	30,104	0	252,501
15,434.00 BSF	*Level Unit Cost-->*		*8.66*	*5.75*	*1.95*	*0.00*	*16.36*
A117AA13 ABATEMENT - ELECTRICAL WIRE	*LEVEL CONTRACTOR ID APPLIED--PRIME*						
* LEVEL IS AN ASSEMBLY WITH UOM OF 1							
	Abatement - Electrical Wire		3.38	2.20	1.13	0.00	6.71
	SUB-221/221 0.022 hrs/unit	340 TOTAL HRS 15,434.00 BSF	52,151	33,904	17,440	0	103,496
	* LINE ITEM ASSEMBLY Factor:1.0000						
	Subtotal Direct Costs		52,151	33,904	17,440	0	103,496
	Subcontractor Markups		13,120	9,301	3,892	0	26,313
	Prime Contractor Markups		26,840	17,766	8,772	0	53,378
TOTAL A117AA13 ABATEMENT - ELECTRICAL WIRE		340 HRS	92,112	60,972	30,104	0	183,187
15,434.00 BSF	*Level Unit Cost-->*		*5.97*	*3.95*	*1.95*	*0.00*	*11.87*
A117AA14 ABATEMENT - BLACK MOLD	*LEVEL CONTRACTOR ID APPLIED--PRIME*						
* LEVEL IS AN ASSEMBLY WITH UOM OF 1							
	Remove Interior Wall Finishes		0.00	4.49	1.78	0.00	6.27
	SUB-221/221 0.045 hrs/unit	2832 TOTAL HRS 62,928.00 SF	0	282,754	112,012	0	394,766
	Subtotal Direct Costs		0	282,754	112,012	0	394,766
	Subcontractor Markups		0	77,570	24,994	0	102,564
	Prime Contractor Markups		0	148,167	56,337	0	204,504
TOTAL A117AA14 ABATEMENT - BLACK MOLD		2,832 HRS	0	508,491	193,343	0	701,834
15,434.00 BSF	*Level Unit Cost-->*		*0.00*	*32.95*	*12.53*	*0.00*	*45.47*
A117AA15 DUMP FEES	*LEVEL CONTRACTOR ID APPLIED--PRIME*						
	Debris Removal		2507.00	0.00	0.00	0.00	2,507.00
	SUB-111/NoCrew	15.00 LDS	37,605	0	0	0	37,605
	Subtotal Direct Costs		37,605	0	0	0	37,605
	Subcontractor Markups		9,461	0	0	0	9,461
	Prime Contractor Markups		19,354	0	0	0	19,354
TOTAL A117AA15 DUMP FEES			66,419	0	0	0	66,419
30.00 LDS	*Level Unit Cost-->*		*2,213.98*	*0.00*	*0.00*	*0.00*	*2,213.98*
A117AA16 REMOVE PCB CONTAINING EQUIPMENT	*LEVEL CONTRACTOR ID APPLIED--PRIME*						
	Replace Switch Gear "Main"		79570.00	21332.99	1587.00	0.00	102,489.99
	SUB-161/161 200 hrs/unit	200 TOTAL HRS 1.00 EA	79,570	21,333	1,587	0	102,490
	Replace Subpanels		19075.00	5119.92	1124.13	0.00	25,319.05
	SUB-161/161 48 hrs/unit	192 TOTAL HRS 4.00 EA	76,300	20,480	4,497	0	101,276
	Subtotal Direct Costs		155,870	41,813	6,084	0	203,766
	Subcontractor Markups		39,214	11,471	1,357	0	52,042
	Prime Contractor Markups		80,219	21,910	3,060	0	105,189
TOTAL A117AA16 REMOVE PCB CONTAINING EQUIPMENT		392 HRS	275,303	75,194	10,501	0	360,998
5.00 EA	*Level Unit Cost-->*		*55,060.68*	*15,038.76*	*2,100.15*	*0.00*	*72,199.59*
SUBTOTAL A117AA ABATEMENT			427,316	487,924	170,417	0	1,085,656
MARKUP			*1.766*	*1.798*	*1.726*	*0.000*	*1.774*
TOTAL A117AA ABATEMENT			754,741	877,458	294,155	0	1,926,354
A118 SITE IMPROVEMENTS							
REF COMPLETE							
A118AA SITE IMPROVEMENTS							
A118AA11 DIVERT RAIN WATER TO STORM DRAIN	*LEVEL CONTRACTOR ID APPLIED--PRIME*						
	Divert Rain Water To Storm Drain		141.70	84.87	46.29	0.00	272.86
	SUB-221/221 0.85 hrs/unit	298 TOTAL HRS 350.00 LF	49,595	29,706	16,202	0	95,502
	Storm Drain Tie-In		5777.00	7988.08	3306.25	0.00	17,071.33
	SUB-221/221 80 hrs/unit	80 TOTAL HRS 1.00 EA	5,777	7,988	3,306	0	17,071

CODE SUB/CREW	DESCRIPTION	QTY UM	TOTAL COSTS MATERIAL	LABOR	EQUIPMENT	UNIT COST (SUB QUOTE)	TOTAL
	Subtotal Direct Costs		55,372	37,694	19,508	0	112,574
	Subcontractor Markups		13,931	10,341	4,353	0	28,624
	Prime Contractor Markups		28,497	19,752	9,812	0	58,061
	TOTAL A118AA11 DIVERT RAIN WATER TO STORM DRAIN	378 HRS	97,800	67,787	33,672	0	199,259
	350.00 LF	*Level Unit Cost-->*	*279.43*	*193.68*	*96.21*	*0.00*	*569.31*
	A118AA12 UPGRADE PARKING LOT DRAINAGE *LEVEL CONTRACTOR ID APPLIED--PRIME*						
	Install Catch Basins		25070.00	7988.08	3306.25	0.00	36,364.33
SUB-221/221	80 hrs/unit 240 TOTAL HRS	3.00 EA	75,210	23,964	9,919	0	109,093
	Subtotal Direct Costs		75,210	23,964	9,919	0	109,093
	Subcontractor Markups		18,922	6,574	2,213	0	27,709
	Prime Contractor Markups		38,707	12,558	4,989	0	56,253
	TOTAL A118AA12 UPGRADE PARKING LOT DRAINAGE	240 HRS	132,839	43,096	17,121	0	193,056
	3.00 EA	*Level Unit Cost-->*	*44,279.57*	*14,365.38*	*5,706.90*	*0.00*	*64,351.85*
	A118AA13 WIDEN EAST SIDE WALKWAYY TO 5 FEET *LEVEL CONTRACTOR ID APPLIED--PRIME*						
	Widen Side Walk		14.28	8.49	3.11	0.00	25.88
SUB-221/221	0.085 hrs/unit 128 TOTAL HRS	1,500.00 SF	21,419	12,731	4,665	0	38,815
	Install New Curb		15.81	7.19	2.45	0.00	25.44
SUB-221/221	0.072 hrs/unit 22 TOTAL HRS	300.00 LF	4,742	2,157	735	0	7,633
	Subtotal Direct Costs		26,160	14,888	5,400	0	46,448
	Subcontractor Markups		6,581	4,084	1,205	0	11,871
	Prime Contractor Markups		13,463	7,801	2,716	0	23,981
	TOTAL A118AA13 WIDEN EAST SIDE WALKWAYY TO 5 FEET	149 HRS	46,205	26,773	9,321	0	82,299
	1,500.00 SF	*Level Unit Cost-->*	*30.80*	*17.85*	*6.21*	*0.00*	*54.87*
	A118AA14 UPGRADE PARKING LOT TO MEET ADA *LEVEL CONTRACTOR ID APPLIED--PRIME*						
	Parking Lot Ada Signage		190.75	149.78	46.29	0.00	386.82
SUB-221/221	1.5 hrs/unit 6 TOTAL HRS	4.00 EA	763	599	185	0	1,547
	Subtotal Direct Costs		763	599	185	0	1,547
	Subcontractor Markups		192	164	41	0	398
	Prime Contractor Markups		393	314	93	0	800
	TOTAL A118AA14 UPGRADE PARKING LOT TO MEET ADA	6 HRS	1,348	1,077	320	0	2,745
	4.00 EA	*Level Unit Cost-->*	*336.91*	*269.35*	*79.90*	*0.00*	*686.16*
	A118AA15 REPAIR & RESURFACE EAST ROADWAY *LEVEL CONTRACTOR ID APPLIED--PRIME*						
	Repair & replace East roadway		10.14	3.79	1.92	0.00	15.85
SUB-221/221	0.038 hrs/unit 92 TOTAL HRS	2,430.00 SF	24,633	9,220	4,666	0	38,519
	* LINE ITEM ASSEMBLY Factor:1.0000						
	Subtotal Direct Costs		24,633	9,220	4,666	0	38,519
	Subcontractor Markups		6,197	2,529	1,041	0	9,768
	Prime Contractor Markups		12,677	4,832	2,347	0	19,856
	TOTAL A118AA15 REPAIR & RESURFACE EAST ROADWAY	92 HRS	43,508	16,581	8,053	0	68,142
	2,430.00 SF	*Level Unit Cost-->*	*17.90*	*6.82*	*3.31*	*0.00*	*28.04*
	A118AA16 SEWER LINE REPLACEMENT *LEVEL CONTRACTOR ID APPLIED--PRIME*						
	Sewer Line Replacement		68.67	33.44	24.46	0.00	126.57
SUB-151/151	0.35 hrs/unit 88 TOTAL HRS	250.00 LF	17,168	8,359	6,115	0	31,642
	* LINE ITEM ASSEMBLY Factor:1.0000						
	Demo & Replace Building Slab		10.14	9.19	8.99	0.00	28.31
SUB-221/221	0.092 hrs/unit 92 TOTAL HRS	1,000.00 SF	10,137	9,186	8,990	0	28,313
	* LINE ITEM ASSEMBLY Factor:4.0000						
	Subtotal Direct Costs		27,305	17,546	15,105	0	59,955
	Subcontractor Markups		6,869	4,813	3,370	0	15,053
	Prime Contractor Markups		14,052	9,194	7,597	0	30,844
	TOTAL A118AA16 SEWER LINE REPLACEMENT	180 HRS	48,226	31,553	26,073	0	105,852
	250.00 LF	*Level Unit Cost-->*	*192.90*	*126.21*	*104.29*	*0.00*	*423.41*
	SUBTOTAL A118AA SITE IMPROVEMENTS		209,442	103,911	54,782	0	368,136
	MARKUP		*1.766*	*1.798*	*1.726*	*0.000*	*1.769*
	TOTAL A118AA SITE IMPROVEMENTS		369,925	186,868	94,559	0	651,353

CODE	DESCRIPTION / SUB/CREW	QTY	UM	TOTAL COSTS MATERIAL	LABOR	EQUIPMENT	UNIT COST (SUB QUOTE)	TOTAL

99.0% OF PROJECT PERFORMED BY SUBCONTRACTORS

105 DETAIL LINE ITEMS

ATTACHMENT I

CBRE VALUATION & ADVISORY SERVICES

APPRAISAL REPORT

11973 SAN VICENTE BOULEVARD
LOS ANGELES, CALIFORNIA 90049
CBRE FILE NO. CB24US054736-1

CLIENT: ALSTON & BIRD LLP

CBRE

VALUATION & ADVISORY SERVICES

CBRE

400 S. Hope St., #2500
Los Angeles, CA 90071

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Date of Report: July 15, 2024

Mr. Edward Casey, Partner
Alston & Bird LLP
350 South Grand Avenue, 51st Floor
Los Angeles, CA 90071
Phone: 213-576-1005
Email: Ed.Casey@alston.com

RE: Appraisal of: Barry Building
11973 San Vicente Boulevard
Los Angeles (Brentwood), CA 90040
CBRE, Inc. File No. CB24US054736-1

Dear Mr. Casey:

At your request and authorization, CBRE, Inc. has prepared a market value appraisal of the referenced property. Our analysis is presented in the following Appraisal Report. The subject property is a commercial site at 11973 San Vicente Boulevard, improved with a vacant but historical structure, known as the Barry Building.

The appraisal is based on the specific assumption that the existing building, due to its historic status, must be preserved. This in turn will require extensive and very expensive retrofit/renovation costs.

Based on the analysis contained in the following report, and the specific assumptions described and reported, the market value of the subject property is concluded as follows:

MARKET VALUE CONCLUSION

Appraisal Premise	Interest Appraised	Date of Value	Value Conclusion
Preservation of Barry Building	Fee Simple Estate	July 10, 2024	Zero

Compiled by CBRE

Reflecting the specific assumptions, the subject property has no (or potentially a negative) market value.

The legal rights appraised were the fee simple interest; the date of value was July 10, 2024. The intended use is to aid the Commission's consideration of approval of demolition of the subject; the intended user is Ed Casey, Partner, Alston & Bird, their client in this matter, and the Los Angeles Cultural Heritage Commission.

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The report, in its entirety, including all assumptions and limiting conditions, is an integral part of, and inseparable from, this letter.

The following appraisal sets forth the most pertinent data gathered, the techniques employed, and the reasoning leading to the opinion of value. The analyses, opinions and conclusions were developed based on, and this report has been prepared in conformance with, the guidelines and recommendations set forth in the Uniform Standards of Professional Appraisal Practice (USPAP), and the requirements of the Code of Professional Ethics and Standards of Professional Appraisal Practice of the Appraisal Institute.

The intended use and user of our report are specifically identified in our report as agreed upon in our contract for services and/or reliance language found in the report. As a condition to being granted the status of an intended user, any intended user who has not entered into a written agreement with CBRE in connection with its use of our report agrees to be bound by the terms and conditions of the agreement between CBRE and the client who ordered the report. No other use or user of the report is permitted by any other party for any other purpose. Dissemination of this report by any party to any non-intended users does not extend reliance to any such party, and CBRE will not be responsible for any unauthorized use of or reliance upon the report, its conclusions or contents (or any portion thereof).

It has been a pleasure to assist you in this assignment. If you have any questions concerning the analysis, or if CBRE can be of further service, please contact us.

Respectfully submitted,

CBRE - VALUATION & ADVISORY SERVICES

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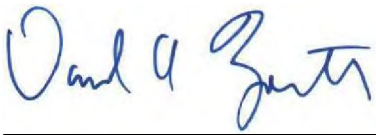
Certification

We certify to the best of our knowledge and belief:

1. The statements of fact contained in this report are true and correct.
2. The reported analyses, opinions, and conclusions are limited only by the reported assumptions and limiting conditions and are our personal, impartial, and unbiased professional analyses, opinions, and conclusions.
3. We have no present or prospective interest in the property that is the subject of this report and no personal interest with respect to the parties involved.
4. David A Zoraster, MAI and David Warren have provided services, as appraisers, but not in any other capacity, regarding the property that is the subject of this report within the three-year period immediately preceding acceptance of this assignment. The subject property was previously appraised in February 2024 (for estate purposes).
5. We have no bias with respect to the property that is the subject of this report or to the parties involved with this assignment.
6. Our engagement in this assignment was not contingent upon developing or reporting predetermined results.
7. Our compensation for completing this assignment is not contingent upon the development or reporting of a predetermined value or direction in value that favors the cause of the client, the amount of the value opinion, the attainment of a stipulated result, or the occurrence of a subsequent event directly related to the intended use of this appraisal.
8. The reported analyses, opinions, and conclusions were developed, and this report has been prepared, in conformity with the requirements of the Uniform Standards of Professional Appraisal Practice.
9. Interior and exterior inspections of the property that is the subject of this report were performed by the appraisers in January 2024 for a prior assignment (an appraisal for estate purposes).
10. No one provided significant real property appraisal assistance to the persons signing this certification.
11. The reported analyses, opinions, and conclusions were developed, and this report has been prepared, in conformity with the requirements of the Code of Professional Ethics and Standards of Professional Appraisal Practice of the Appraisal Institute.
12. The use of this report is subject to the requirements of the Appraisal Institute relating to review by its duly authorized representatives.
13. As of the date of this report, David A Zoraster, MAI has completed the continuing education program for Designated Members of the Appraisal Institute.



David A. Zoraster, MAI
Lic. No. AG001735 (exp 5/16/2026)



David Warren
Lic. No. 3012073 (exp 1/16/2026)

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Subject Photographs



Aerial View (boundaries are approximate)

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San Vicente frontage, looking east. Note landscaped median.



San Vicente frontage, looking west. Note chain link fencing along Barry Building frontage.



Street view (San Vicente) of Barry Building.



Barry Building, east side exterior and driveway easement.

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Barry Building, rear side.



Barry Building court yard. Note plywood over windows.



Barry Building courtyard.



Barry Building "soft" ground floor.

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Vacant commercial land adjacent west of Barry Building.



Barry Building rear surface parking.

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Executive Summary

Property Name	Barry Building
Location	11973 San Vicente Boulevard Los Angeles, Los Angeles County, CA 90049
Parcel Number(s)	4404-025-008
Client	Alston & Bird LLP
Highest and Best Use	
As If Vacant	Not Applicable
As Improved	Office Over Retail with Rear Parking
Property Rights Appraised	Fee Simple Estate
Date of Inspection	January 17, 2024
Estimated Exposure/Marketing Time	9 - 12 Months
Land Area	0.61 AC 26,700 SF
Improvements	14,284 SF gross (the 2-story Barry Building)
Zoning	C4-1VL

CONCLUDED MARKET VALUE

Appraisal Premise	Interest Appraised	Date of Value	Value
Preservation of Barry Building	Fee Simple Estate	July 10, 2024	Zero

Compiled by CBRE

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STRENGTHS, WEAKNESSES, OPPORTUNITIES AND THREATS (SWOT)

Strengths/ Opportunities

- The subject Brentwood neighborhood of West Los Angeles is an upscale and prestigious area.

Weaknesses/ Threats

- Land use regulations and approvals in the area are time consuming and difficult.
- The site (11973 San Vicente) is improved with a vacated, vandalized, historic building with earthquake code, Americans with Disabilities (ADA) issues, and major additional costs.
- Building has been vacant and boarded up since 2017, with substantial physical deterioration and some vandalism.

MARKET VOLATILITY

We draw your attention to a combination of inflationary pressures (leading to higher interest rates) and recent failures/stress in banking systems which have significantly increased the potential for constrained credit markets, negative capital value movements and enhanced volatility in property markets over the short-to-medium term.

Experience has shown that consumer and investor behavior can quickly change during periods of such heightened volatility. Lending or investment decisions should reflect this heightened level of volatility and the potential for deteriorating market conditions.

It is important to note that the conclusions set out in this report are valid as at the valuation date only. Where appropriate, we recommend that the valuation is closely monitored, as we continue to track how markets respond to evolving events.

SPECIFIC ASSUMPTIONS

A specific assumption for this purpose is defined as "an assignment-specific assumption as of the effective date regarding uncertain information used in an analysis which, if found to be false, could alter the appraiser's opinions or conclusions." [1]

- This appraisal assumes that the existing building, due to its historic status, must be preserved. (To be determined by the Los Angeles City Cultural Heritage Commission.)
- The subject property was inspected for purposes of this appraisal approximately six months prior to the date of value. It is assumed – based on that inspection and interviews with the property manager – that it was essentially unchanged during that time period.
- Site (land) areas and dimensions were taken or calculated from L.A. County Assessor's Office Maps and Records. A land survey was requested but was not available.

[1] The Appraisal Foundation, *USPAP, 2024 Edition (Effective January 1, 2024)*

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- We have relied in part on engineering studies by Englekirk Structural Engineers; ADA access studies by Gruen Associates (ADA access requirements); and a Hill International cost study (dated June 26, 2024; a copy is contained in the Addenda). These result in an estimated direct cost to retrofit/renovate the subject Barry Building to meet seismic and Americans with Disabilities Act requirements of $17,100,000 (direct costs only, excluding legal, finance, developer's profit, and tenant improvements).

- The gross area of the Barry Building (14,284 sq. ft., plus 1,150 sq. ft. of balcony/walkway) was taken from the Hill International cost study, with indirect verification from the Englekirk study and our onsite inspection. (Note, L.A. County Assessor's Office public records show a considerably larger area, apparently erroneously including the interior courtyard.)

- Information on the Environmental Impact Report process and status, relative to demolition of the Barry Building, was based on interviews with Ed Casey, Partner, Alston & Bird, land use attorney representing the property owner.

- We have assumed that the retrofit/renovation costs would qualify for the full 20% income tax credit as "Qualified Rehabilitation Expenditures" under I.R.C. Treasury Regulations.

- The use of these specific assumptions significantly affected the assignment results.

HYPOTHETICAL CONDITIONS

A hypothetical condition is defined as "a condition, directly related to a specific assignment, which is contrary to what is known by the appraiser to exist on the effective date of the assignment results but is used for the purposes of analysis." [2]

- None noted

OWNERSHIP AND PROPERTY HISTORY

Title to the property is vested in 11993 San Vicente LLC. Related entities own neighboring sites.

The subject site is improved with a two-story office building. Known as the Barry Building, it was built in 1951 and contains approximately 15,434 square feet, including 1,150 sq. ft. of balcony/walkway. Its address is 11973 San Vicente (MB 4404-025-008).

The building is considered an example of mid-century modern commercial architecture. In 2007—apparently in order to delay its demolition and redevelopment of the site—it was listed as a Los Angeles City Historic Cultural Monument (#887). As a result, demolition of the building requires a full Environmental Impact Report (EIR), now complete (L.A. City ENV-2019-EIR). As of the date of value, the EIR required certification and then public hearings.

The building has been vacant and boarded up since 2017. In March of 2018 it was cited by L.A. City Department of Building and Safety with an Order to Comply under Ordinance 183893 for

[2] The Appraisal Foundation, *USPAP, 2024 Edition (Effective January 1, 2024)*

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its Soft Story design (weak seismic safety due to tuck under ground floor). It has suffered considerable vandalism and deterioration.

CBRE is unaware of any sales or other ownership transfers of the subject property within three years of the date of appraisal. Further, the property is not reportedly being offered for sale as of the current date.

EXPOSURE/MARKETING TIME

Current appraisal guidelines require an estimate of a reasonable time period in which the subject could be brought to market and sold. This reasonable time frame can either be examined historically or prospectively. In a historical analysis, this is referred to as exposure time. Exposure time always precedes the date of value, with the underlying premise being the time a property would have been on the market prior to the date of value, such that it would sell at its appraised value as of the date of value. On a prospective basis, the term marketing time is most often used. The exposure/marketing time is a function of price, time, and use. It is not an isolated estimate of time alone.

The complex issues required of development generally in the area and added complications of the mixed zoning and of the vacant historic building have been considered in our analysis.

We have therefore concluded to marketing and exposure times of: Nine to 12 months.

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ADDENDA

A Hill International June 27, 2024 Cost Letter
B Qualifications

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Scope of Work

This Appraisal Report is intended to comply with the real property appraisal development and reporting requirements set forth under Standards Rule 1 and 2 of USPAP. The scope of the assignment relates to the extent and manner in which research is conducted, data is gathered, and analysis is applied.

INTENDED USE OF REPORT

The intended use is to aid the Commission's consideration of approval of demolition of the subject.

CLIENT

The client is Mr. Edward Casey, Partner; and his firm, Alston & Bird LLP.

INTENDED USER OF REPORT

This appraisal is to be used by Edward Casey, Partner, Alston & Bird, their client in this matter, and the Los Angeles Cultural Heritage Commission. No other user(s) may rely on our report unless as specifically indicated in this report.

> Intended users are those who an appraiser intends will use the appraisal or review report. In other words, appraisers acknowledge at the outset of the assignment that they are developing their expert opinions for the use of the intended users they identify. Although the client provides information about the parties who may be intended users, ultimately it is the appraiser who decides who they are. This is an important point to be clear about: The client does not tell the appraiser who the intended users will be. Rather, the client tells the appraiser who the client needs the report to be speaking to, and given that information, the appraiser identifies the intended user or users. It is important to identify intended users because an appraiser's primary responsibility regarding the use of the report's opinions and conclusions is to those users. Intended users are those parties to whom an appraiser is responsible for communicating the findings in a clear and understandable manner. They are the audience. [3]

RELIANCE LANGUAGE

Reliance on any reports produced by CBRE under this Agreement is extended solely to parties and entities expressly acknowledged in a signed writing by CBRE as Intended Users of the respective reports, provided that any conditions to such acknowledgement required by CBRE or hereunder have been satisfied. Parties or entities other than Intended Users who obtain a copy of the report or any portion thereof (including Client if it is not named as an Intended User), whether as a result of its direct dissemination or by any other means, may not rely upon any opinions or

[3] Appraisal Institute, *The Appraisal of Real Estate*, 15th ed. (Chicago: Appraisal Institute, 2020), 40.

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conclusions contained in the report or such portions thereof, and CBRE will not be responsible for any unpermitted use of the report, its conclusions or contents or have any liability in connection therewith.

PURPOSE OF THE APPRAISAL

The purpose of this appraisal is to develop an opinion of the market value of the subject property, specifically assuming that the subject building must be preserved.

DEFINITION OF VALUE

The current economic definition of market value agreed upon by agencies that regulate federal financial institutions in the U.S. (and used herein) is as follows:

The most probable price which a property should bring in a competitive and open market under all conditions requisite to a fair sale, the buyer and seller each acting prudently and knowledgeably, and assuming the price is not affected by undue stimulus. Implicit in this definition is the consummation of a sale as of a specified date and the passing of title from seller to buyer under conditions whereby:

1. buyer and seller are typically motivated;
2. both parties are well informed or well advised, and acting in what they consider their own best interests;
3. a reasonable time is allowed for exposure in the open market;
4. payment is made in terms of cash in U.S. dollars or in terms of financial arrangements comparable thereto; and
5. the price represents the normal consideration for the property sold unaffected by special or creative financing or sales concessions granted by anyone associated with the sale. [4]

INTEREST APPRAISED

The value estimated represents Fee Simple Estate as defined below:

> *Fee Simple Estate* - Absolute ownership unencumbered by any other interest or estate, subject only to the limitations imposed by the governmental powers of taxation, eminent domain, police power and escheat. [5]

Extent to Which the Property is Identified

The property is identified through the following sources:

- postal address
- assessor's records
- legal description

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[4] 12 CFR, Part 34, Subpart C-Appraisals, 34.42(h).

[5] Appraisal Institute, The Dictionary of Real Estate Appraisal, 7th ed. (Chicago: Appraisal Institute, 2022), 73.

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Extent to Which the Property is Inspected

The appraisers inspected the interior and exterior of the subject, as well as its surrounding environs on January 17, 2024, approximately six months prior to the date of value. This inspection was considered adequate and is in part the basis for our findings. Note however, that the building is boarded up, limiting the interior inspection.

Type and Extent of the Data Researched

CBRE reviewed the following:

- applicable tax data
- zoning requirements
- flood zone status
- demographics
- multiple listing service
- comparable data
- the subject Environmental Impact Report and related studies
- CBRE interviewed the following:
    - Mr. Robert Harden, Property Manager
    - Mr. Ed Casey, Land Use Attorney
    - Mr. Kevin Brogan, Attorney

Type and Extent of Analysis Applied

CBRE, Inc. analyzed the data gathered through the use of appropriate and accepted appraisal methodology to arrive at a probable value indication via each applicable approach to value. For vacant land, the sales comparison approach has been employed for this assignment.

STATEMENT OF COMPETENCY

The appraisers have the appropriate knowledge, education and experience to complete this assignment competently.

APPRAISAL METHODOLOGY

Methodology Used

We have used the sales comparison approach to value the subject building, assuming its preservation and renovation.

Cost estimates, provided primarily by Hill International, were used to estimate the costs that would be required to renovate the Barry Building to allow legal occupancy.

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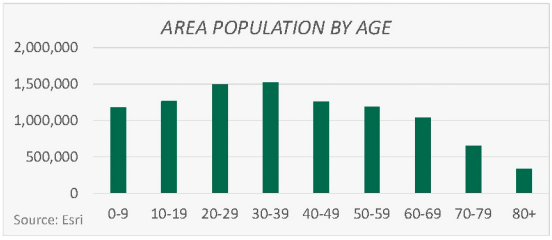
Area Analysis

The subject property is located in Los Angeles County which includes 88 cities and approximately 140 unincorporated areas and communities within a 4,084 square-mile area. The following map illustrates the County boundaries.

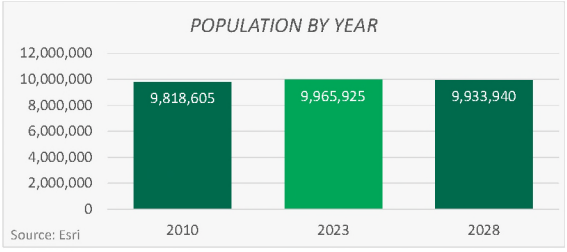


POPULATION

The area has a population of 9,965,925 and a median age of 37, with the largest population group in the 30-39 age range and the smallest population in 80+ age range.



Population has increased by 147,320 since 2010, reflecting an annual increase of 0.1%. Population is projected to decrease by 31,985 between 2023 and 2028, reflecting a 0.1% annual population decline.



Source: ESRI, downloaded on Dec, 14 2023

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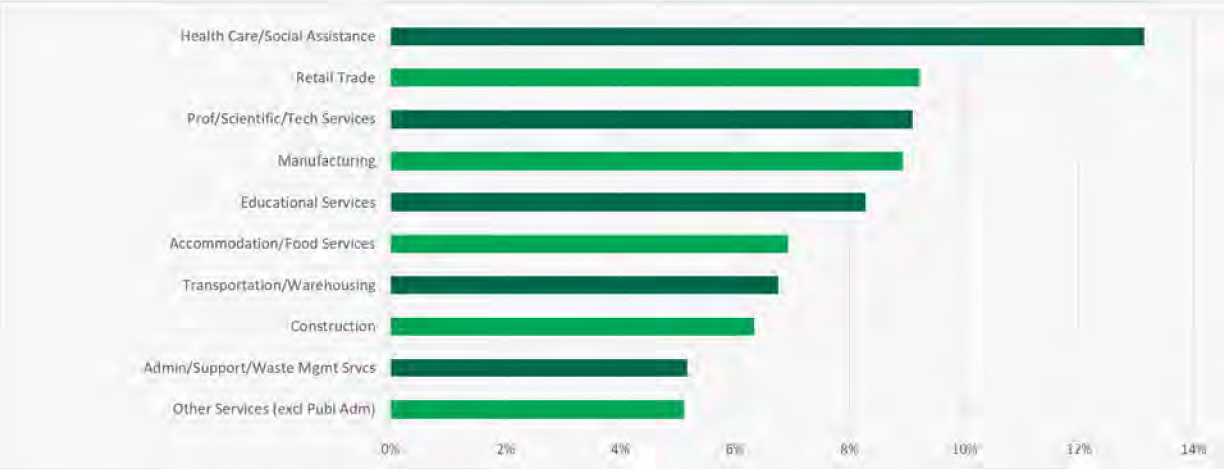
According to the County website, the 10 most populated cities are as follows:

TOP 10 POPULATED CITIES	
City	Population
Los Angeles	3,898,747
Long Beach	466,742
Santa Clarita	228,673
Glendale	196,543
Lancaster	173,576
Palmdale	169,450
Pomona	151,713
Torrance	147,067
Pasadena	138,699
Downey	114,355
Source: Los Angeles County	

EMPLOYMENT



The top three industries within the area are Health Care/Social Assistance, Retail Trade, and Prof/Scientific/Tech Services. The top 25 employers within Los Angeles County listed below are predominately in healthcare, education, entertainment, and government sectors.

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TOP 25 EMPLOYERS - LOS ANGELES COUNTY		
Company	Industry	Employees
Los Angeles International Airport (LAX)	Airports	45,000
UCLA Health System	Physicians & Surgeons	35,543
UCLA Community Based Learning	Junior Colleges & Technical Institutes	30,000
University of California Los Angeles	Schools-Universities & Colleges Academic	27,489
National Institutes Of Health	Physicians & Surgeons	20,000
Los Angeles County Sheriff	Government Offices-County	20,000
Cedars-Sinai Medical Center	Hospitals	11,246
Vision X	Call Centers	10,000
Los Angeles Police Dept	Police Departments	9,000
Warner Brothers Studio	Television Program Producers	8,000
Deluxe Digital Media Management Inc.	Audio-Visual Consultants	8,000
Kaiser Permanente Los Angeles	Hospitals	6,061
Space Exploration Tech Corp	Aerospace Industries (Mfrs)	6,001
Walt Disney Co.	Water Parks	6,000
Paramount Special Events	Motion Picture Producers & Studios	6,000
Twentieth Century Fox	Motion Picture Producers & Studios	6,000
AHMC Healthcare Inc	Health Care Management	6,000
Sony Pictures Entertainment	Motion Picture Producers & Studios	6,000
Jet Propulsion Laboratory	Research Service	6,000
Radford Studio Center Inc	Government-Operators-Nonresidential Bldg	5,000
Six Flags Magic Mountain	Amusement & Theme Parks	5,000
Long Beach City Hall	Government Offices-City, Village & Twp	5,000
Northrop Grumman	Engineers	5,000
Longshore Dispatch	Nonclassified Establishments	5,000
Cedars-Sinai Medical Center	Medical Centers	5,000

Source: Fastreport Dimension

The following chart compares the unemployment rate for the County to that of the state and country.

AVERAGE ANNUAL UNEMPLOYMENT RATE			
Year	Los Angeles County	State of California	U.S.
2013	7.7%	7.9%	9.8%
2014	6.8%	7.4%	8.2%
2015	5.8%	6.8%	6.7%
2016	5.2%	5.4%	5.3%
2017	4.6%	4.2%	4.8%
2018	3.9%	2.7%	4.6%
2019	3.4%	3.7%	4.5%
2020	6.8%	9.0%	12.3%
2021	3.9%	6.4%	8.9%
2022	2.9%	4.4%	4.9%
Oct 2023	5.8%	4.8%	3.8%

Source: U.S. Bureau of Labor Statistics

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EDUCATION

The State of California has over 750 colleges and universities and the county has 63, making Los Angeles a higher education destination. The five largest colleges/universities in Los Angeles County are shown in the table below.

FIVE LARGEST COLLEGES/UNIVERSITIES

Name	Student Population	Ranked Nationally	Annual Tuition
California State University Northridge	40,108	25	$5,742
East Los Angeles Community College	36,970	N/A	$1,238
California State University Long Beach	32,711	105	$6,904
University of California Los Angeles (UCLA)	32,423	15	$13,752
University of Southern California (USC)	20,699	28	$68,237

Source: US World News Report

Student housing has historically been provided by a limited number of on-campus resources and private owners in traditional multi-family projects. However, in recent years several new properties have been built in the USC area due to the increased demand and high rental rates, some averaging $1,500 per bed.

ENTERTAINMENT

Visitors come to Los Angeles for the abundance of activities, restaurants, and shopping, and for its diverse culture and fantastic weather.

Los Angeles is home to six professional sports teams who utilize various sports venues. The most notable and recently built Sofi Stadium hosts the Los Angeles Rams and Los Angeles Chargers football teams. It is a 70,240-seat sports and entertainment complex outside of Downtown Los Angeles, in the city of Inglewood. It was reported to have cost approximately $5.5 billion to build and added 3,000 non-construction jobs. It has been a boost to the local economy which was generally considered a low-income neighborhood.

Additional entertainment options include those in West Hollywood including the Kodak Theater, El Capitan Theater, Pantages Theater, the Roxy, and the Troubadour. Downtown Los Angeles includes notable museums, the Broad, Grammy Museum, and the Museum of Contemporary Art. The Disney Music Hall is not only a popular musical venue but an architecturally significant structure.

While downtown Los Angeles has increased its retail presence, high-end shopping is still found on Rodeo Drive in Beverly Hills with The Grove in West Los Angeles and the Americana in Glendale offering unique outdoor shopping experiences.

TRANSPORTATION

Los Angeles International Airport is one of the largest in the Country. Smaller airports in the area include the Bob Hope International Airport and commuter planes utilize Van Nuys Airport. Over

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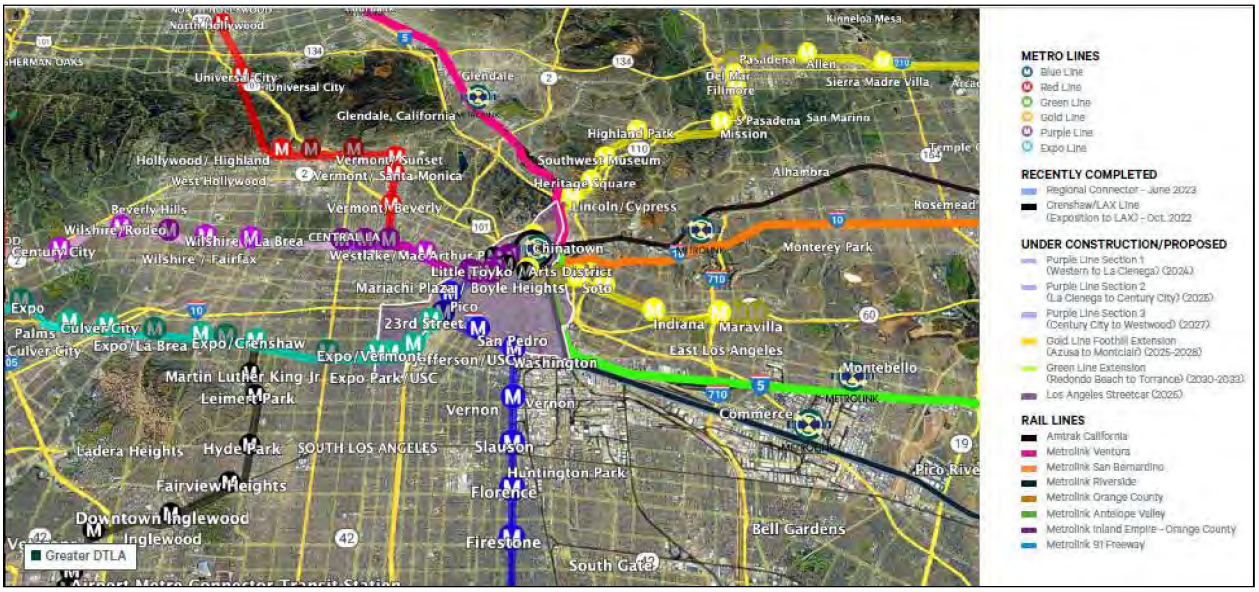
the past 20 years, a focus on providing public transportation options has led to several new passenger railways that expand to Downtown Los Angeles, the beach cities, and the valley areas.



CONCLUSION

Despite current conditions, Los Angeles County continues to be a significant economic landscape not only within California but the entire United States. Health care, a growing industry remains a strong economic force as well as the educational employment sector. Leisure and Hospitality have had the fastest growth rate largely due to the pandemic declines, but growth is expected to moderate in 2024. The cost of living is expected to negatively impact population growth as affordable housing continues to be an issue. On a positive note, according to the Los Angeles County Economic Development Corporation, the County and City of Los Angeles are undertaking efforts to attract and facilitate regional investment to transform the economy positively and equitably.

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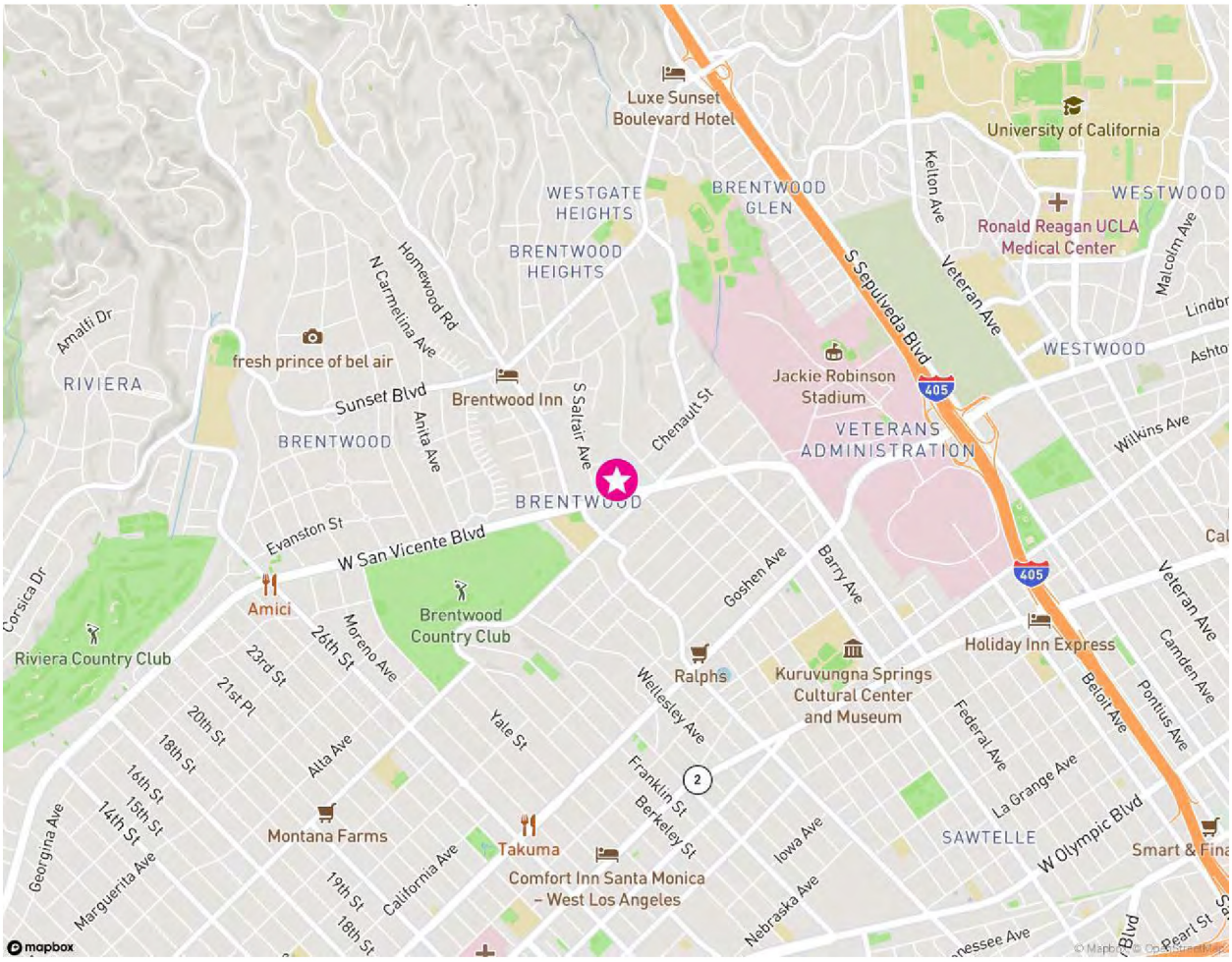
Neighborhood Analysis



COMMUNITY OF BRENTWOOD

The subject property is located in the western portion of the City of Los Angeles in the community of Brentwood. Neighborhood boundaries consist of the San Diego (405) Freeway to the east, the Santa Monica Mountains to the north, Wilshire Boulevard to the south, and 26th Street to the west. The surrounding neighborhoods consist of the city of Santa Monica (southwest), the community of Pacific Palisades (west) and the communities of Bel Air and Westwood (northeast and east).

The community of Brentwood is located three miles east of the Pacific Ocean. This location provides more favorable weather conditions than inland areas and has increased both the residential and commercial desirability of the area. The West Los Angeles area has good regional freeway access, which provides an additional benefit.

Land Use

Brentwood is primarily a high-end single family residential area. San Vicente Boulevard is a major east/west street through the subject neighborhood. Land use along San Vicente Boulevard

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consists of a high concentration of both retail-oriented uses and low- and mid-rise office buildings. The subject neighborhood is primarily built-out and there are few vacant in-fill sites available. The majority of properties in the subject market area are of older construction and in average to good condition.

Major developments in the area include the Brentwood Country Club (a block west of the subject), Riviera Country Club, Will Rogers State Historic Park, Saint John's Hospital (Santa Monica), and the Veterans Administration Center (three+ blocks east of the subject). The City of Santa Monica begins several blocks to the west, at 26th Street.

Transportation

The community of Brentwood has good regional access to all of Southern California through local and freeway arterials. The San Diego (405) Freeway is located approximately one mile east of the subject, and the Santa Monica (10) Freeway is located two miles south of the subject. In addition, Pacific Coast Highway is situated approximately three miles west of the subject. Access to the San Diego (405) Freeway is provided by San Vicente Boulevard and Wilshire Boulevard. Main north/south arterials include Barrington Avenue and Bundy Drive. Vehicle traffic in the area is heavy.

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MULTIFAMILY RESIDENTIAL MARKET

The following table summarizes historical and projected performance for the Brentwood/Westwood/Beverly Hills apartment submarket, as reported by Axiometrics.

BRENTWOOD/WESTWOOD/BEVERLY HILLS APARTMENT SUBMARKET							
Year Ending	Inventory (Units)	Completions (Units)	Occupied Stock (Units)	Occupancy	Effective Rent ($/Unit / Mo.)	Effective Rent Change	Net Absorption (Units)
2013	54,467	206	51,760	95.0%	$2,536	3.54%	-1,451
2014	54,883	434	53,121	96.8%	$2,893	4.09%	1,363
2015	54,896	39	53,128	96.8%	$3,018	3.55%	8
2016	55,156	260	52,961	96.0%	$3,054	4.55%	-171
2017	55,357	249	53,447	96.6%	$3,249	3.38%	487
2018	55,705	348	54,257	97.4%	$3,383	4.02%	811
2019	55,940	235	53,926	96.4%	$3,468	1.43%	-334
2020	55,940	0	51,101	91.4%	$3,172	-10.08%	-2,822
2021	56,153	213	53,963	96.1%	$3,747	7.37%	2,861
Q1 2022	56,553	400	54,461	96.3%	$3,800	0.93%	498
Q2 2022	56,601	48	54,592	96.5%	$3,541	2.15%	126
Q3 2022	56,601	0	53,714	94.9%	$3,780	1.86%	-880
Q4 2022	56,682	81	54,239	95.7%	$3,651	-0.10%	531
2022	56,682	529	54,239	95.7%	$3,651	6.74%	277
Q1 2023	56,694	12	53,814	94.9%	$3,665	0.35%	-421
Q2 2023	56,701	43	53,497	94.4%	$3,657	-0.05%	-321
Q3 2023	56,909	208	53,398	93.8%	$3,644	0.05%	-101
Q4 2023	56,939	30	54,138	95.1%	$3,618	-0.45%	746
2023	56,939	293	54,138	95.1%	$3,618	-0.10%	-101
2024*	57,659	720	55,007	95.4%	$3,634	0.40%	905
2025*	57,945	286	55,222	95.3%	$3,678	1.20%	189
2026*	58,152	207	55,303	95.1%	$3,758	2.20%	80
2027*	58,329	177	55,354	94.9%	$3,836	2.10%	52
2028*	58,476	147	55,494	94.9%	$3,942	2.80%	140

*Future Projected Data according to Axiometrics

Source: Axiometrics, 4th Quarter 2023

The Brentwood/Westwood/Beverly Hills submarket consists of approximately 56,939 residential units. Completions are projected to total 1,537 units over the next five years, representing approximately 2.7% of 2023 inventory. After negative net absorption and slightly negative rent growth in 2023, the submarket is forecast to experience positive net absorption and positive rent growth from 2024 to 2028.

The most current figures (Q1 through Q4, 2023) show slowing and then a decline in apartment rents. Broker interviews indicate a significant reduction in development land activity.

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DEMOGRAPHICS

Selected neighborhood demographics in 1-, 3- and 5-mile radius from the subject are shown in the following table:

SELECTED NEIGHBORHOOD DEMOGRAPHICS

11973 San Vicente Los Angeles, CA 90049	1 Mile Radius	3 Mile Radius	5 Mile Radius	Los Angeles County
Population				
2028 Total Population	35,185	236,665	478,108	9,933,940
2023 Total Population	34,879	235,232	474,677	9,965,925
2010 Total Population	31,975	221,326	456,364	9,818,605
2000 Total Population	31,034	209,240	440,678	9,519,048
Annual Growth 2023 - 2028	*0.17%*	*0.12%*	*0.14%*	*-0.06%*
Annual Growth 2010 - 2023	*0.67%*	*0.47%*	*0.30%*	*0.11%*
Annual Growth 2000 - 2010	*0.30%*	*0.56%*	*0.35%*	*0.31%*
Households				
2028 Total Households	18,318	106,762	219,596	3,453,233
2023 Total Households	18,031	105,268	216,145	3,427,635
2010 Total Households	16,828	102,912	211,730	3,241,204
2000 Total Households	17,155	99,435	207,272	3,133,696
Annual Growth 2023 - 2028	*0.32%*	*0.28%*	*0.32%*	*0.15%*
Annual Growth 2010 - 2023	*0.53%*	*0.17%*	*0.16%*	*0.43%*
Annual Growth 2000 - 2010	*-0.19%*	*0.34%*	*0.21%*	*0.34%*
Income				
2023 Median Household Income	$114,309	$111,602	$112,129	$81,362
2023 Average Household Income	$180,027	$176,110	$177,979	$120,981
2023 Per Capita Income	$92,669	$79,721	$81,526	$41,719
2023 Pop 25+ College Graduates	22,210	120,732	246,434	2,514,491
Age 25+ Percent College Graduates - 2023	78.3%	73.2%	71.4%	37.0%

Source: ESRI

As shown, population and household growth in the immediate area has been and is projected to be limited, but overall similar or somewhat superior to Los Angeles County as a whole. This reflects the generally built-up nature of both.

Conversely the subject neighborhood income and education levels are substantially superior to the County as a whole.

IMMEDIATE SURROUNDING AREA

The subject site is located on the northside of San Vicente Boulevard. The parcel adjacent north of the subject is used as surface parking and is under related ownership to the subject. Vacant residential land is located on the north side of the surface parking and is under related ownership to the subject. Further north are upscale single family residences, all in the Brentwood area of the City of Los Angeles.

San Vicente Boulevard is a scenic corridor, with a landscaped median and mature trees. South across San Vicente from the subject are a mix of low- and mid-rise office buildings and one- and

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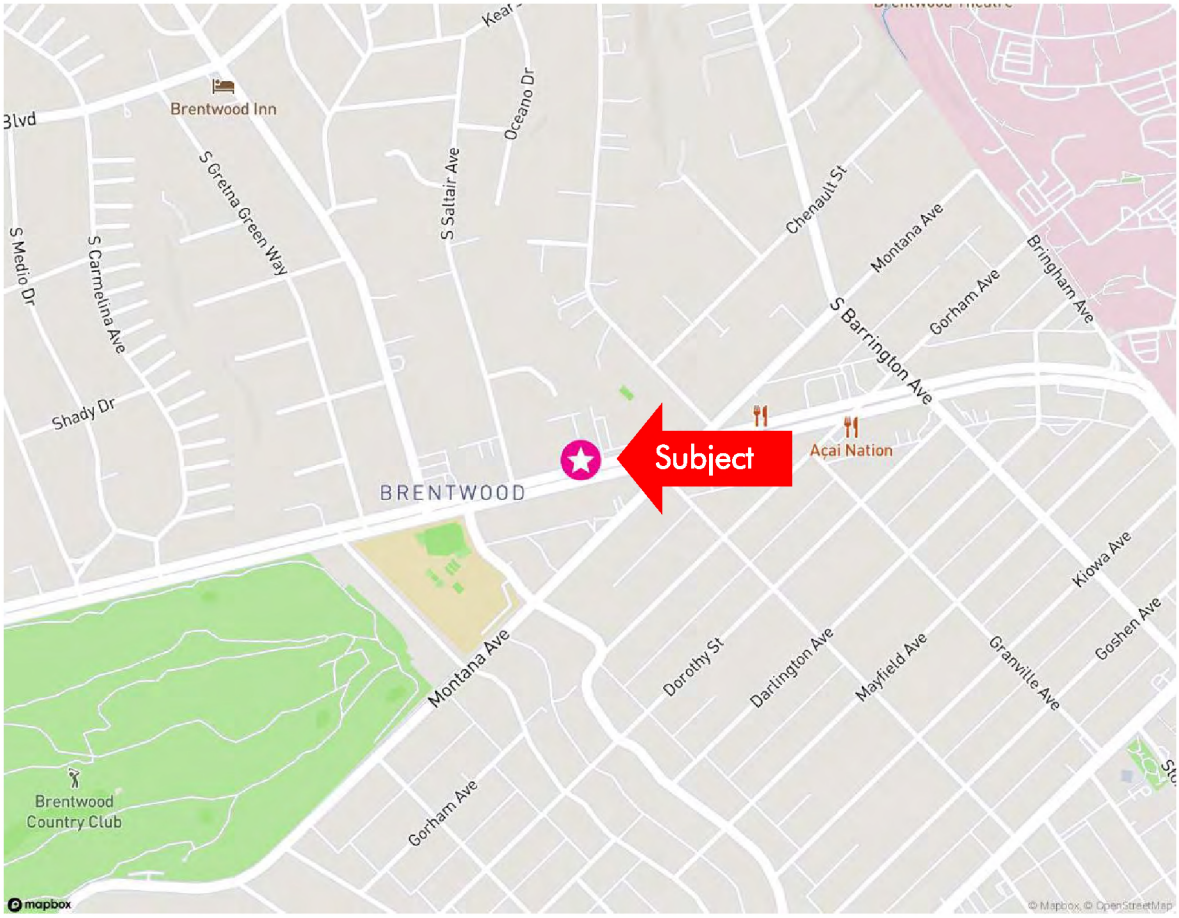
two-story retail and service buildings. Vacant land under related ownership to the subject is located adjacent west of the subject. Further west (at the northeast corner of San Vicente and Saltair Avenue) is a three-story office building.

Adjacent east of the subject is an older retail/service building.

The following map is provided to show the location of the subject and the immediate surrounding area.



San Vicente Boulevard at the subject site is a major divided roadway, heavily landscaped, crossing through West Los Angeles in a generally north-west/south-west direction.

Overall, surrounding uses are considered to be conforming.

CONCLUSION

The subject property is located in the West Los Angeles area, in the community of Brentwood. With its diverse residential and commercial base along with its close proximity to the Pacific Ocean and the UCLA campus, the West Los Angeles area is one of the most desirable areas in Los Angeles County. Based on present market conditions, lack of abundant vacant land, and the overall desirability of the area, property value in Brentwood is expected to retain its highly desirable reputation, establishing the benchmark for the remainder of the region.

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PLAT MAP



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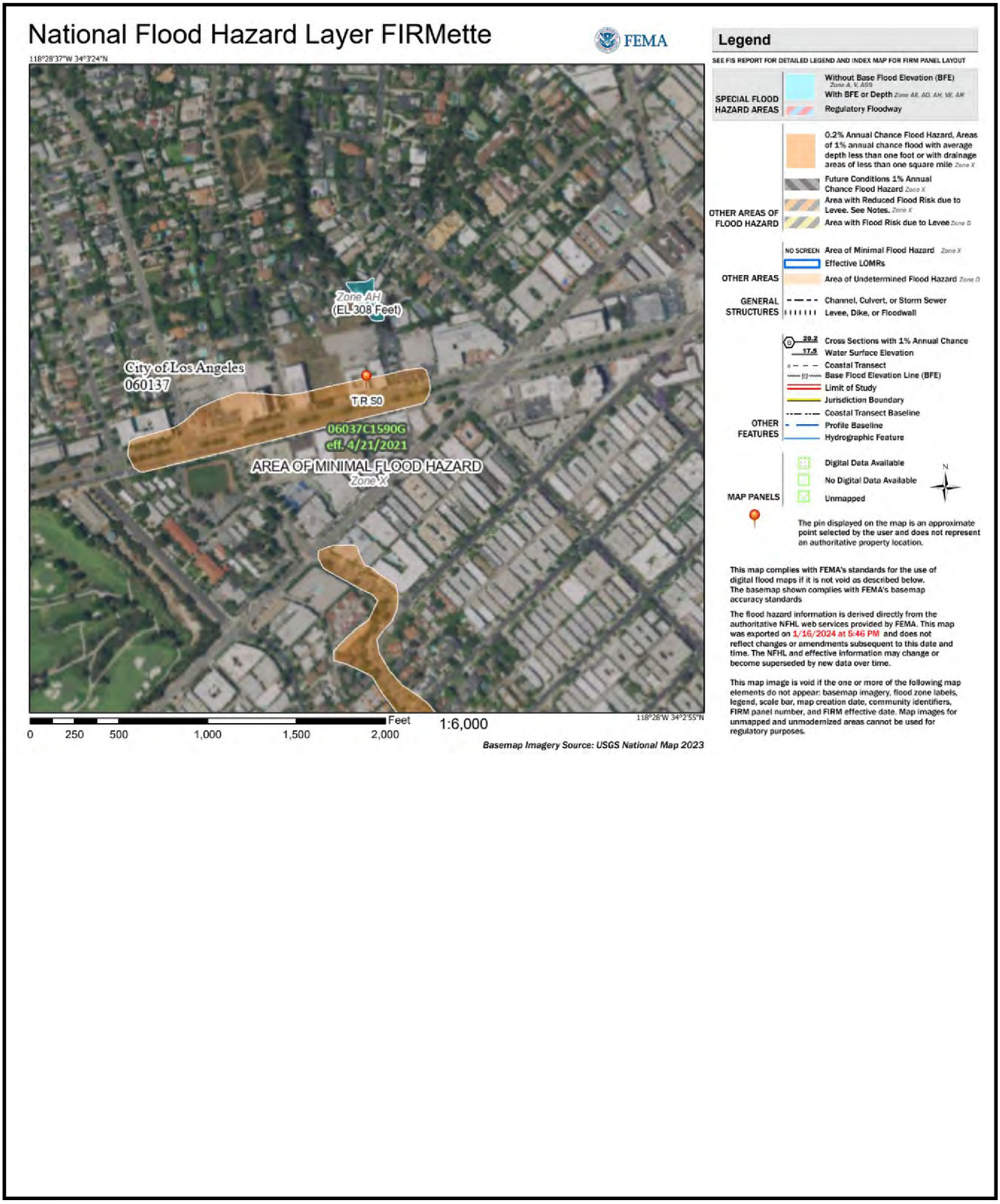
FLOOD PLAIN MAP



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Site Analysis

The following chart and narrative summarize the characteristics of the subject site.

SITE SUMMARY AND ANALYSIS - 11973 SAN VICENTE

Physical Description		
Gross Site Area	0.61 Acres	26,700 Sq. Ft.
Net Site Area	0.61 Acres	26,700 Sq. Ft.
Parcel Number(s)	MB 4404-025-008	
Zoning	C4-1VL	
Flood Map Panel No. & Date	06037C1590G	21-Apr-21
Flood Zone	Zone X (Shaded)	
Shape	Rectangular	
Frontage	133.5 Fr. Ft. (on San Vicente)	
Depth	200 Feet	

Comparative Analysis	**Rating**
Visibility	Good
Functional Utility	Average
Traffic Volume	-
Adequacy of Utilities	Adequate
Landscaping	-
Drainage	Adequate

Utilities	**Availability**
Water	Yes
Sewer	Yes
Natural Gas	Yes
Electricity	Yes
Mass Transit	No

Other	**Yes**	**No**	**Unknown**
Detrimental Easements			X
Encroachments			X
Deed Restrictions	X		
Reciprocal Parking Rights			X

Various sources compiled by CBRE

LOCATION

The subject site is on the north side of San Vicente Boulevard, east of Saltair Avenue.

TOPOGRAPHY

The site slopes slightly upward from San Vicente Street.

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INGRESS/EGRESS – STREETS

San Vicente Boulevard, at the subject, is an east/west street that has a dedicated width of 134 feet and is improved with two lanes of traffic in each direction separated by a center median. Street improvements include asphalt paving and concrete curbs, gutters and sidewalks, and street lighting. Street parking is permitted. The street median is landscaped, with mature trees.

The east side of the San Vicente frontage (11973 San Vicente) is a driveway shared with the abutting property to the east (11961 San Vicente). It is approximately 15 feet wide, based on a recorded "Agreement" (recorded June 18, 1970; doc. #2948). The legal description of this document is apparently in error.

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Improvement Description – Required Work/Status

The only significant improvements consist of the Barry Building, located at 11973 San Vicente Boulevard, on the subject site, with surface parking to the rear.

Size: Per Hill International, the building has a gross area of 15,434 square feet, including 1,150 square feet of balcony and walkway. The gross building area excluding the balcony and walkway is 14,284 square feet. The "leaseable" area is reported at 12,800 square feet.

Design and Layout: A two-story office over retail/service structure with overall dimensions of 100 by 107 feet, built around a 43 by 56 foot court yard, essentially dividing the building into four wings.

Exterior Walls: Stucco with flat windows, now boarded up.

Structural: Wood-frame on a four inch concrete slab at grade, with a flat roof structure.

The south wing ground floor is an open pedestrian passage way to the interior court yard. It has no bearing walls, resulting in the Soft Story Ordinance issues discussed below (required code work).

Mechanical: One restroom on each floor; central meter for electrical; ducted heat; window/wall air conditioning units (removed); stair access only to second floor.

Interior: All in poor condition. Considerable water damage from roof leaks. Wood floors. Painted plaster walls and ceiling.

History: Built in 1951, an example of commercial mid-century modern design. It was listed in 2007 as L.A. City Historic-Cultural Monument #887.

It has been vacant since 2017, with chain link fencing and plywood placed around it for security. Ongoing problems with break-ins and homeless squatters.

Other Improvements: The central courtyard has some remaining landscaping, and two design stairways. Interior access on the second floor is by walkways and covered balconies, totaling approximately 1,150 square feet.

Rear asphalt paving, in poor condition.

Required Code Work: Based on data provided by the law firm of Alston & Bird, attorneys for the property owner (letter dated April 20, 2023, subsequent interviews with Ed Casey, Esq.); together with studies by the City of Los Angeles Department of Building and Safety (inspection October 21, 2014); by Englekirk Structural Engineers (June 2021 to October 2022), Gruen Associates-Barry Building, ADA Upgrade Requirements (June 2021), and Hill International Cost Report Regarding Barry Building Renovation (June 26, 2024); our onsite inspection, and interviews with Mr. Harden, the

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site manager; the subject building has the following seismic and other code issues and costs:

1) It violates the L.A. City Soft Story Ordinance, specifically due to its open ground floor at its south wing.
2) The remaining wings are severely (190 to 650%) "over stressed", requiring major additional seismic work.
3) The building requires major Americans with Disabilities Act (ADA), including limits on the number and design of restrooms and the lack of elevators.
4) Additional code work is also required, as well as major mechanical, roof, interior and exterior repairs and replacements.
5) The cost for renovating the Barry Building is estimated at $17,100,000, per Hill International letter dated June 27, 2024. (This is the direct cost only, not including legal, finance, interior tenant improvements, or developer's profit.)

   As described, it would require very major costs to renovate, in the range of $1,197.14+ per square foot of gross area ($17,100,000 ÷ 14,284 sq. ft. gross), direct costs only.

Demo Permit EIR:

In 2019 an application to demolish the building was made by the owner, requiring an Environmental Impact Report (EIR). That report, citing the issues and costs described above, was completed in 2023, prior to the date of value. However certification of it, and public hearings remain.

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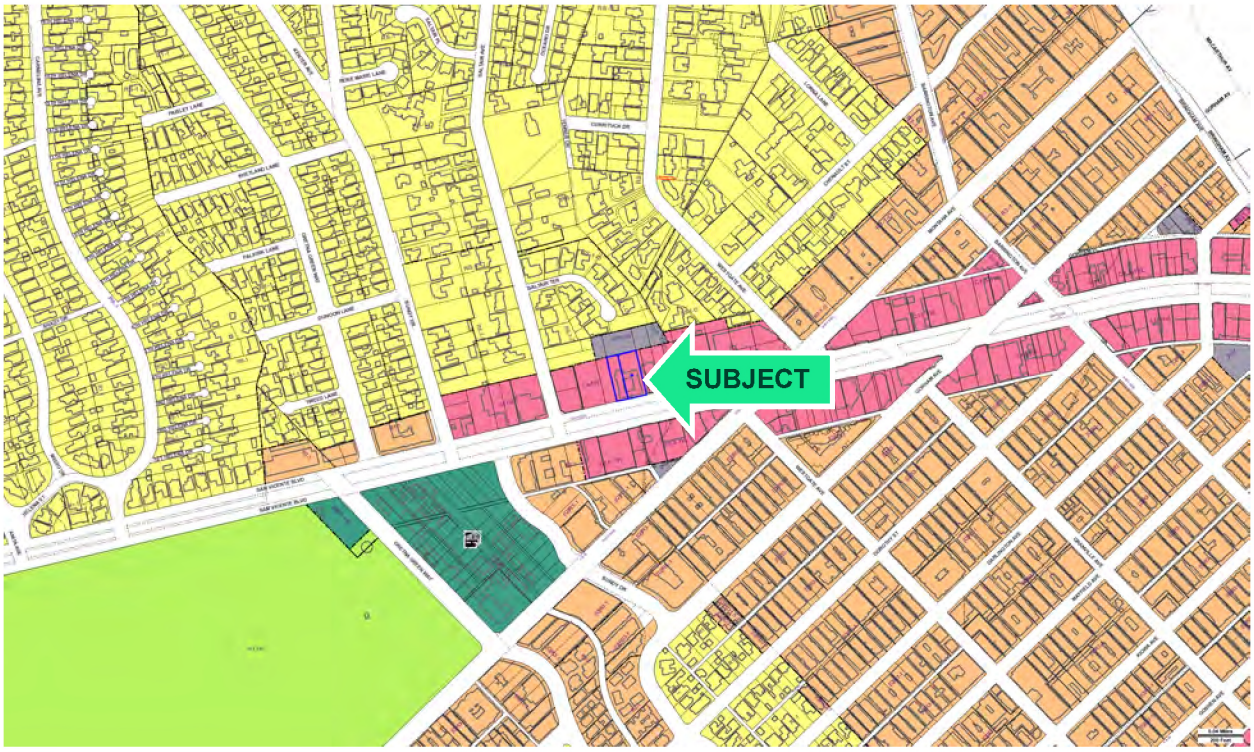
ZONING MAP



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Zoning

The following chart summarizes the subject's zoning requirements.

ZONING SUMMARY - 11973 SAN VICENTE	
Current Zoning	C4-1VL
Legally Conforming	Yes
Uses Permitted	Most retail, office, & commercial uses; multi-family residential to the R4 (1/400 Sq. Ft. land area) density.
Zoning Change	Not likely
Category	**Zoning Requirement**
Minimum Lot Size	Generally none
Minimum Lot Width	Generally none
Maximum Height	45 Feet; 3 story
Minimum Setbacks	Generally None
Maximum FAR/Density	1.50 : 1
Subject's Actual FAR	N/A
Subject's Actual Density	N/A
Parking Requirements	-
Subject's Actual Parking	N/A
Source: Planning & Zoning Dept.	

The general plan (Brentwood-Pacific Palisades) designation is Neighborhood Office Commercial. It is ineligible under the Transit Oriented Communities (TOC).

The site is also subject to the San Vicente Scenic Corridor Specific Plan, which requires streetscape design criteria to "…protect the pedestrian-scale and community-oriented commercial nature…" along the Boulevard (ENV-2019-EIR).

The "1VL" is a height district generally allowing a maximum building height of 45 feet or 3-story and a density (floor area ratio or FAR) of 1.5 to one.

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Tax and Assessment Data

In California, privately held real property is typically assessed at 100% of full cash value (which is interpreted to mean market value of the fee simple estate) as determined by the County Assessor. Generally, a reassessment occurs only when a property is sold (or transferred) or when new construction occurs (as differentiated from replacing existing construction). In the case of long-term ground leases, the general rule is that a reassessment is made at the time of assigning or terminating a lease where the remaining term is more than 35 years. For reassessment purposes, the lease term includes all options to extend. Assessments for properties that were acquired before the tax year 1975-1976 were stabilized as of the tax year 1975-1976. Property taxes are limited by state law to 1% of the assessed value plus voter-approved obligations and special assessments. If no sale (or transfer) occurs or no new building takes place, assessments may not increase by more than 2% annually.

The following table summarizes the actual subject 2023-2024 assessments.

AD VALOREM TAX INFORMATION

Assessor Parcel No.	Assessed Value	Property Taxes	Effective Tax Rate
MB 4404-025-008	$5,270,505	$65,276.49	1.2385%

Source: L.A. County Assessor's Office

The subject is located in Tax Rate Area 67, with a current real property tax rate of 1.199398%.

CONCLUSION

For purposes of this analysis, CBRE, Inc. assumes that all taxes are current. If the subject sold for the value estimate in this report, a reassessment at that value would most likely occur, with tax increases limited to two percent annually thereafter until the property is sold again. The consequences of this reassessment have been considered in the appropriate valuation sections.

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Highest and Best Use

In appraisal practice, the concept of highest and best use represents the premise upon which value is based. The four criteria the highest and best use must meet are:

legally permissible;
physically possible;
financially feasible; and
maximally productive.

The highest and best use analysis of the subject is discussed below.

AS VACANT

The "As Vacant" highest and best use analysis is excluded from consideration due to the specific assumption that the existing building must be preserved.

AS IMPROVED

The subject site is improved with the Barry Building, a vacant and very deteriorated building.

Required Costs

As described, it would require very major costs to retrofit/renovate, in the range of $1,197.14+ per square foot of gross area ($17,100,000 ÷ 14,284 square feet gross), direct costs only.

A portion of these costs may be offset by a 20% income tax credit for the rehabilitation of historic buildings. "Certified Historic Structures," as determined by the Secretary of the Interior, through the National Park Service, may be eligible for the credit. The 20% rehabilitation tax credit is equal to 20% of the amount spent on "qualified rehabilitation expenditures." For additional information the term "qualified rehabilitation expenditures" see I.R.C. § 47(c)(2), Treasury Regulation § 1.48-12(b) and (c). CBRE is not qualified to provide tax, legal or accounting advice, and it is recommended that the client/reader consult an accountant, tax attorney, or the Internal Revenue Service.

However, even with the potential 20% income tax credit, the direct project costs would be in the range of more than $957.71+ per square foot of gross area ($17,100,000 x 80% = $13,605,600 ÷ 14,284 square feet gross).

Additional Costs Not Shown

These direct costs do not include the additional indirect costs that would be incurred for legal, finance, developer's profit, and tenant improvements.

1) These required direct costs would almost certainly require some additional legal and administrative costs.
2) Required direct costs would either be financed, with additional interest costs; or would be paid for out of savings taken from other (profit or interest earning) investments.

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3) The developer doing this work—undertaking the economic risks of the project—requires some reward or profit.

4) The office market typically requires a landlord to provide interior buildout for floor cover, walls, ceiling, electric and mechanical specific to the tenant's requirements—costs not included in the Hill International cost study.

These indirect costs (excluding tenant improvements/interior buildout) typically are in the range of 10% to 20% of direct costs.

Highest and Best Use – As Improved

As shown in the following section, the rehabilitation costs, both with and without the possible tax credit, are substantially above the value of similar (but operating) low rise office buildings in the area.

Under the specific assumption that the existing building must be preserved, highest and best use "As Improved" is to abandon it.

Note, conversion to a residential or partial residential use would require essentially similar seismic, structural, and ADA access work and costs, with increased interior remodeling, plumbing, and mechanical work.

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Sales Comparison Approach

Assuming preservation and retrofit/renovation of the subject Barry Building, its value after retrofit/renovation would reflect the sales prices of similar low rise office buildings in the West Los Angeles market.

COMPARABLE OFFICE BUILDING SALES

	Address Name	Size (S.F.) Year Built/Renov.	Sale Date Doc. No.	Sales Price Price/S.F.
1)	11860 Wilshire Boulevard, Los Angeles, CA 90025	16,000 1963/2005	Feb. 23, 2024 24-119879, 119904, & 125238	$11,500,000 $718.75
2)	2136 Cotner Avenue, Los Angeles, CA 90025	7,000 1969	Feb. 16, 2024 24-104834	$3,625,000 $517.86
3)	1100 South Beverly Drive, Los Angeles, CA 90035	7,160 1952	Feb. 20, 2024 24-109367	$4,500,000 $628.49
4)	520 South Sepulveda Boulevard, Los Angeles, CA 90049	19,812 1970	Mar. 30, 2023 23-201478	$9,300,000 $469.41
5)	1554 South Sepulveda Boulevard, Los Angeles, CA 90025	19,600 1949/1986	Mar. 28, 2023 23-195008	$10,000,000 $510.20
6)	11440 San Vicente Boulevard, Brentwood, CA 90049	24,317 1972	Feb. 2, 2022 22-131010	$19,000,000 $781.35
7)	1630-1638 12th Street, Santa Monica, CA 90404	19,335 1955	Sept. 26, 2023 23-647492	$20,200,000 $1,044.74
8)	604 Arizona Avenue, Santa Monica, CA 90401	44,260 1950/2005	Aug. 25, 2023 23-567028	$32,500,000 $734.30
9)	1386-1388 Westwood Boulevard (Retail/Office) Los Angeles, CA 90024	7,530 1931	Sept. 8, 2023 23-59936	$3,900,000 $517.93
	SUBJECT 11973 San Vicente, Los Angeles (Brentwood), CA 90049	14,284 1951/2024*	D.O.V. July 10, 2024	Renovation Costs $17,100,000** $1,197.14+

Source: CBRE *Hypothetical after renovation **Estimated direct cost only

The comparable sales range in price per square foot from $469.41 to $1,044.74 per square foot, averaging $658.11 per square foot.

Comparable 4, at the low end of the range, is a larger four-story, multi-tenant office building located just east of the 405 Freeway and south of Montana Avenue, in Los Angeles. It requires some upward adjustment.

Comparable 7, at the high end of the range, is a one-story, single-tenant office building with a superior location in the City of Santa Monica. Comparable 1, the most recent sale (and the third highest), is a medical office building with a superior build-out compared to general office buildings. Both require downward adjustment.

The subject value, if retrofitted/renovated, would be towards the upper middle of the range, at $650 to $800 per square foot.

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Value Conclusion

In the sales comparison approach, the subject assuming required retrofit/renovation was compared to similar recently sold properties.

As described in the prior section, we found nine such sales, ranging in price per square foot from $469.41 to $1,044.74 per square foot, averaging $658.11 per square foot.

The cost to retrofit/renovate is estimated at $957.71, assuming the 20% rehabilitation tax credit is received, but excluding indirect costs (legal, finance, developer's profit, and tenant improvements).

Value Conclusion – Assuming Preservation

Under the specific assumption that the existing building must be preserved, and reflecting the costs required to retrofit/renovate it, the subject property has zero (or negative) value.

MARKET VALUE CONCLUSION

Appraisal Premise	Interest Appraised	Date of Value	Value Conclusion
Preservation of Barry Building	Fee Simple Estate	July 10, 2024	Zero

Compiled by CBRE

If all required costs were in fact incurred, the resulting value would be negative.

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Assumptions and Limiting Conditions

1. CBRE, Inc. through its appraiser (collectively, "CBRE") has inspected through reasonable observation the subject property. However, it is not possible or reasonably practicable to personally inspect conditions beneath the soil and the entire interior and exterior of the improvements on the subject property. Therefore, no representation is made as to such matters.
2. The report, including its conclusions and any portion of such report (the "Report"), is as of the date set forth in the letter of transmittal and based upon the information, market, economic, and property conditions and projected levels of operation existing as of such date. The dollar amount of any conclusion as to value in the Report is based upon the purchasing power of the U.S. Dollar on such date. The Report is subject to change as a result of fluctuations in any of the foregoing. CBRE has no obligation to revise the Report to reflect any such fluctuations or other events or conditions which occur subsequent to such date.
3. Unless otherwise expressly noted in the Report, CBRE has assumed that:
   (i) Title to the subject property is clear and marketable and that there are no recorded or unrecorded matters or exceptions to title that would adversely affect marketability or value. CBRE has not examined title records (including without limitation liens, encumbrances, easements, deed restrictions, and other conditions that may affect the title or use of the subject property) and makes no representations regarding title or its limitations on the use of the subject property. Insurance against financial loss that may arise out of defects in title should be sought from a qualified title insurance company.
   (ii) Existing improvements on the subject property conform to applicable local, state, and federal building codes and ordinances, are structurally sound and seismically safe, and have been built and repaired in a workmanlike manner according to standard practices; all building systems (mechanical/electrical, HVAC, elevator, plumbing, etc.) are in good working order with no major deferred maintenance or repair required; and the roof and exterior are in good condition and free from intrusion by the elements. CBRE has not retained independent structural, mechanical, electrical, or civil engineers in connection with this appraisal and, therefore, makes no representations relative to the condition of improvements. CBRE appraisers are not engineers and are not qualified to judge matters of an engineering nature, and furthermore structural problems or building system problems may not be visible. It is expressly assumed that any purchaser would, as a precondition to closing a sale, obtain a satisfactory engineering report relative to the structural integrity of the property and the integrity of building systems.
   (iii) Any proposed improvements, on or off-site, as well as any alterations or repairs considered will be completed in a workmanlike manner according to standard practices.
   (iv) Hazardous materials are not present on the subject property. CBRE is not qualified to detect such substances. The presence of substances such as asbestos, urea formaldehyde foam insulation, contaminated groundwater, mold, or other potentially hazardous materials may affect the value of the property.
   (v) No mineral deposit or subsurface rights of value exist with respect to the subject property, whether gas, liquid, or solid, and no air or development rights of value may be transferred. CBRE has not considered any rights associated with extraction or exploration of any resources, unless otherwise expressly noted in the Report.
   (vi) There are no contemplated public initiatives, governmental development controls, rent controls, or changes in the present zoning ordinances or regulations governing use, density, or shape that would significantly affect the value of the subject property.
   (vii) All required licenses, certificates of occupancy, consents, or other legislative or administrative authority from any local, state, or national government or private entity or organization have been or can be readily obtained or renewed for any use on which the Report is based.
   (viii) The subject property is managed and operated in a prudent and competent manner, neither inefficiently, nor super-efficiently.
   (ix) The subject property and its use, management, and operation are in full compliance with all applicable federal, state, and local regulations, laws, and restrictions, including without limitation environmental laws, seismic hazards, flight patterns, decibel levels/noise envelopes, fire hazards, hillside ordinances, density, allowable uses, building codes, permits, and licenses.
   (x) The subject property is in full compliance with the Americans with Disabilities Act (ADA). CBRE is not qualified to assess the subject property's compliance with the ADA, notwithstanding any discussion of possible readily achievable barrier removal construction items in the Report.

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(xi) All information regarding the areas and dimensions of the subject property furnished to CBRE are correct, and no encroachments exist. CBRE has neither undertaken any survey of the boundaries of the subject property, nor reviewed or confirmed the accuracy of any legal description of the subject property.

Unless otherwise expressly noted in the Report, no issues regarding the foregoing were brought to CBRE's attention, and CBRE has no knowledge of any such facts affecting the subject property. If any information inconsistent with any of the foregoing assumptions is discovered, such information could have a substantial negative impact on the Report and any conclusions stated therein. Accordingly, if any such information is subsequently made known to CBRE, CBRE reserves the right to amend the Report, which may include the conclusions of the Report. CBRE assumes no responsibility for any conditions regarding the foregoing, or for any expertise or knowledge required to discover them. Any user of the Report is urged to retain an expert in the applicable field(s) for information regarding such conditions.

4. CBRE has assumed that all documents, data and information furnished by or on behalf of the client, property owner or owner's representative are accurate and correct, unless otherwise expressly noted in the Report. Such data and information include, without limitation, numerical street addresses, lot and block numbers, Assessor's Parcel Numbers, land dimensions, square footage area of the land, dimensions of the improvements, gross building areas, net rentable areas, usable areas, unit count, room count, rent schedules, income data, historical operating expenses, budgets, and related data. Any error in any of the above could have a substantial impact on the Report and any conclusions stated therein. Accordingly, if any such errors are subsequently made known to CBRE, CBRE reserves the right to amend the Report, which may include the conclusions of the Report. The client and intended user should carefully review all assumptions, data, relevant calculations, and conclusions of the Report and should immediately notify CBRE of any questions or errors within 30 days after the date of delivery of the Report.
5. CBRE assumes no responsibility (including any obligation to procure the same) for any documents, data or information not provided to CBRE, including, without limitation, any termite inspection, survey or occupancy permit.
6. All furnishings, equipment and business operations have been disregarded with only real property being considered in the Report, except as otherwise expressly stated and typically considered part of real property.
7. Any cash flows included in the analysis are forecasts of estimated future operating characteristics based upon the information and assumptions contained within the Report. Any projections of income, expenses and economic conditions utilized in the Report, including such cash flows, should be considered as only estimates of the expectations of future income and expenses as of the date of the Report and not predictions of the future. This Report has been prepared in good faith, based on CBRE's current anecdotal and evidence-based views of the commercial real estate market. Although CBRE believes its views reflect market conditions on the date of this Report, they are subject to significant uncertainties and contingencies, many of which are beyond CBRE's control. In addition, many of CBRE's views are opinion and/or projections based on CBRE's subjective analyses of current market circumstances. Actual results are affected by a number of factors outside the control of CBRE, including without limitation fluctuating economic, market, and property conditions. Actual results may ultimately differ from these projections, and CBRE does not warrant any such projections. Further, other firms may have different opinions, projections and analyses, and actual market conditions in the future may cause CBRE's current views to later change or be incorrect. CBRE has no obligation to update its views herein if its opinions, projections, analyses or market circumstances later change.
8. The Report contains professional opinions and is expressly not intended to serve as any warranty, assurance or guarantee of any particular value of the subject property. Other appraisers may reach different conclusions as to the value of the subject property. Furthermore, market value is highly related to exposure time, promotion effort, terms, motivation, and conclusions surrounding the offering of the subject property. The Report is for the sole purpose of providing the intended user with CBRE's independent professional opinion of the value of the subject property as of the date of the Report. Accordingly, CBRE shall not be liable for any losses that arise from any investment or lending decisions based upon the Report that the client, intended user, or any buyer, seller, investor, or lending institution may undertake related to the subject property, and CBRE has not been compensated to assume any of these risks. Nothing contained in the Report shall be construed as any direct or indirect recommendation of CBRE to buy, sell, hold, or finance the subject property.
9. No opinion is expressed on matters which may require legal expertise or specialized investigation or knowledge including, but not limited to, environmental, social, and governance principles ("ESG"), beyond that customarily employed by real estate appraisers. Any user of the Report is advised to retain experts in areas that fall outside the scope of the real estate appraisal profession for such matters.

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10. CBRE assumes no responsibility for any costs or consequences arising due to the need, or the lack of need, for flood hazard insurance. An agent for the Federal Flood Insurance Program should be contacted to determine the actual need for Flood Hazard Insurance.
11. Acceptance or use of the Report constitutes full acceptance of these Assumptions and Limiting Conditions and any special assumptions set forth in the Report. It is the responsibility of the user of the Report to read in full, comprehend and thus become aware of all such assumptions and limiting conditions. CBRE assumes no responsibility for any situation arising out of the user's failure to become familiar with and understand the same.
12. The Report applies to the property as a whole only, and any pro ration or division of the title into fractional interests will invalidate such conclusions, unless the Report expressly assumes such pro ration or division of interests.
13. The allocations of the total value estimate in the Report between land and improvements apply only to the existing use of the subject property. The allocations of values for each of the land and improvements are not intended to be used with any other property or appraisal and are not valid for any such use.
14. The maps, plats, sketches, graphs, photographs, and exhibits included in this Report are for illustration purposes only and shall be utilized only to assist in visualizing matters discussed in the Report. No such items shall be removed, reproduced, or used apart from the Report.
15. The Report shall not be duplicated or provided to any unintended users in whole or in part without the written consent of CBRE, which consent CBRE may withhold in its sole discretion. Exempt from this restriction is duplication for the internal use of the intended user and its attorneys, accountants, or advisors for the sole benefit of the intended user. Also exempt from this restriction is transmission of the Report pursuant to any requirement of any court, governmental authority, or regulatory agency having jurisdiction over the intended user, provided that the Report and its contents shall not be published, in whole or in part, in any public document without the written consent of CBRE, which consent CBRE may withhold in its sole discretion. Finally, the Report shall not be made available to the public or otherwise used in any offering of the property or any security, as defined by applicable law. Any unintended user who may possess the Report is advised that it shall not rely upon the Report or its conclusions and that it should rely on its own appraisers, advisors and other consultants for any decision in connection with the subject property. CBRE shall have no liability or responsibility to any such unintended user.

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ADDENDA

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Addendum A

HILL INTERNATIONAL JUNE 27, 2024 COST LETTER

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Hill International

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AZ Contractor's License Number
ROC 289497

June 27, 2024

Ms. Gina M. Angiolillo
Senior Associate
Alston & Bird
333 South Hope Street
Los Angeles, CA 90071

Subject: Barry Building – Opinion of Probable Cost

Dear Ms. Angiolillo,

I hope this letter finds you well. I am writing in response to your follow-up regarding the Barry Building project. We appreciate the opportunity to provide further insights to support your submission to the Cultural Heritage Commission. Below, I address the specific points you raised concerning the opinion of probable costs, based on current market conditions from our original analysis performed in November 2022.

Cost Increase in Rehabilitation Construction

Since our initial analysis in November 2022, the cost of construction for rehabilitating the Barry Building has indeed increased. From June 1, 2021, to June 26, 2024, the cost per square foot has risen from $777 to $1,108, representing a 42.5% increase. This escalation is primarily driven by higher labor costs, increased material prices, and rising transportation and disposal fees. The revised estimate for the rehabilitation now stands at $17.1 million, and we have attached the detailed reports (B-SYS "Estimate Summary Report," C-SYS "Assembly Category Report," and E-SYS "Estimate Detail Report") for your reference.

General Estimate for New Construction

For new commercial construction in Los Angeles, costs currently range from $970 to $1,270 per square foot. In the context of the proposed Annex, we project that costs could exceed $1,200 per square foot. This higher estimate considers the required access and roadway modifications, as well as the necessary replacement of the 70-year-old water main and storm drainage system. Thus, your pro forma estimate of $400 per square foot appears significantly underestimated based on current market conditions.

Conservative Estimate for Demolition Costs

The demolition of a portion of the Barry Building to accommodate the Annex presents some complexities. The targeted section is a CMU structure that supports the original building, necessitating additional structural work post-demolition to ensure stability. We estimate the demolition cost to be approximately $8.50 per square foot, with the added structural support to the original building projected at $135,000. This estimate errs on the conservative side, aligning with your request to mitigate potential negative impacts on land valuation.

We trust that this updated analysis will be valuable for your presentation to the Cultural Heritage Commission. Please feel free to reach out if you need further clarification or additional information.

Sincerely,

Louis Rivera

Mr. Louis Rivera
Sr. Director of Estimating
Hill International, Inc.

Enclosures:

B-SYS - Estimate Summary Report
C-SYS - Assembly Category Report
E-SYS - Estimate Detail Report

Addendum B

QUALIFICATIONS

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QUALIFICATIONS OF DAVID A. ZORASTER, MAI

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EDUCATION

University of California at Santa Barbara, Bachelor of Arts
Society of Governmental Appraisers, Seminars
American Society of Appraisers, Seminars
International Association of Assessment Officers, Seminars
Appraisal Institute, Seminars and Courses
American Society of Farm Managers and Rural Appraisers, Seminars
University of California at Los Angeles, Extension Courses

LICENSES/CERTIFICATIONS

- Member, Appraisal Institute (MAI)
- California Certified General Real Estate Appraiser, No. AG001735
- Advanced Appraiser for Property Tax Purposes, State Board of Equalization
- California Community College Instructor's Credential in Real Estate
- UCLA Extension Certificate in Real Estate

GUEST LECTURER AND AUTHOR

- Society of Governmental Appraisers
- The American Society of Appraisers
- The Trust Real Estate Bankers Group
- The Appraisal Journal, Appraisal Institute
- Society of Real Estate Appraisers
- CLE (Continuing Legal Education)
- International Assoc. of Assessment Officers
- Appraisal Institute, National Conference
- So. Calif. Chapter of the Appraisal Institute
- International Right of Way Association
- UCLA Extension
- ULI (Urban Land Institute)

EXPERT WITNESS

Los Angeles County Superior Court; Los Angeles County Assessment Appeals Board; San Francisco Assessment Appeals Board; United States Bankruptcy Court; United States Federal District Court; American Arbitration Association; Kern County Superior Court

EMPLOYMENT

CBRE Valuation and Advisory Services	2012 –
Los Angeles County Assessor's Office – Chief Deputy, Commercial & Investment Properties	2011
CB Richard Ellis, Inc. (Coldwell Banker) Valuation & Advisory Services	1978 – 2011
Los Angeles County Assessor's Office	1970 – 1978
Evening Instructor, Real Estate Appraisal – West Los Angeles Community College	1976 – 1978
Evening Instructor, Real Estate Economics – Glendale Community College	2009 – 2013

SIGNIFICANT ASSIGNMENTS

Pacific Design Center, West Hollywood
California Mart, Downtown Los Angeles
Broadway (The Bloc) Plaza, Arco Towers, Union Bank Plaza
Downtown Los Angeles Financial District
Seventh Street Produce Market, Downtown Los Angeles
New Chinatown, Los Angeles
Los Angeles Center Studios, Los Angeles
East Fifth Street Skid Row, Los Angeles
Million Dollar Theatre Building/Grand Central Market,
Downtown Los Angeles
Redondo Beach/King Harbor Rent Arbitration
Broad Museum, Museum of Contemporary Art (MOCA),
Colburn School, (ground leases) Bunker Hill
Patina Restaurant Group leaseholds,
Hollywood Bowl, Disney Concert Hall,
LACMA, Norton Simon
Hollywood Park/Santa Anita/Golden Gate Racetracks
Hauser & Wirth Art Gallery Rent Reset Arbitration,
Downtown Los Angeles, 2024
Marriott/Intercontinental Hotel and Marina, San Diego
Hollywood Palladium, Hollywood
Egyptian Theater, Hollywood
Los Angeles Times Mirror Square, Downtown Los Angeles
Chevron Corporate Headquarters, San Francisco
Los Angeles Flower Mart, Downtown Los Angeles
Los Angeles Union Station, Downtown Los Angeles
Federal Reserve Bank of San Francisco Headquarters, San Francisco
The Cornfield State Park Site, Los Angeles
The Shrine Auditorium, Los Angeles
Murdock Plaza (10900 Wilshire), Ground Rent Arbitrations, 2008 & 2018
Sony Pictures Plaza Lease Arbitration, Culver City, 2003 & 2008
Capitol Records, Hollywood, 2016 Lease Arbitration
Santa Monica Business Park Ground Rent Arbitration 2008; Mediation 2018
Paul Hastings, 515 S. Flower, Downtown LA, 1998 Lease Arbitration
Baker & Hostetler, 600 S. Grand, Downtown LA, 1995 Lease Arbitration
Neiman Marcus, 9700 Wilshire, Beverly Hills,
2019 Ground Lease Arbitration



VALUATION & ADVISORY SERVICES

David Warren

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Education

- Georgetown University, Washington, D.C., Bachelor of Arts, Economics and Government

Professional Experience

David Warren is a Senior Valuation Associate with CBRE Valuation & Advisory Services in Los Angeles. Since joining CBRE in 2017, Mr. Warren has provided significant appraisal assistance in the valuation of industrial, office, retail, multifamily, land, and mixed-use properties in Southern California. He is a graduate of Georgetown University, Washington, D.C., with an undergraduate degree in Economics and Government.

Professional Affiliation & Accreditations

- California Certified General Real Estate Appraiser

Appraisal Coursework

- Sales Comparison Approach, Site Valuation and Cost Approach, Laws and Regulations for California Appraisers, Elimination of Bias and Cultural Competency for Appraisers, Income Approach, Commercial Appraisal Review, Market Analysis Highest and Best Use, General Report Writing & Case Studies, Basic Appraisal Principles

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CBRE VALUATION & ADVISORY SERVICES

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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,



RICHARD BARRON, President
Cultural Heritage Commission

HISTORIC-CULTURAL MONUMENT APPLICATION

TYPE OR HAND PRINT IN ALL CAPITAL BLOCK LETTERS

IDENTIFICATION

1. NAME OF PROPOSED MONUMENT THE BARRY BUILDING

2. STREET ADDRESS 11973 W. SAN VICENTE BLVD.

   CITY LOS ANGELES, ZIP CODE 90049 COUNCIL DISTRICT 11

3. ASSESSOR'S PARCEL NO. 4404-025-008

4. COMPLETE LEGAL DESCRIPTION: TRACT WESTGATE ACRES

   BLOCK NONE LOT(S) 51 ARB. NO. 1

5. RANGE OF ADDRESSES ON PROPERTY 11973 & 11975 W. SAN VICENTE BLVD.

6. PRESENT OWNER WILLIAM H. BORTHWICK, ET AL. & DAVID B. BORTHWICK

   STREET ADDRESS 245 N. SALTAIR AVE E-MAIL ADDRESS:

   CITY LOS ANGELES. STATE CA ZIP CODE 90049 PHONE (___)

   OWNERSHIP: PRIVATE PUBLIC

7. PRESENT USE COMMERICAL/OFFICE ORIGINAL USE COMMERICAL/OFFICE

DESCRIPTION

8. ARCHITECTURAL STYLE MID-TWENTIETH CENTURY CALIFORNIA MODERN
   (SEE STYLE GUIDE)

9. STATE PRESENT PHYSICAL DESCRIPTION OF THE SITE OR STRUCTURE (SEE OPTIONAL DECRIPTION WORK SHEET. 1 PAGE MAXIMUM)

SEE ATTACHED

HISTORIC-CULTURAL MONUMENT APPLICATION

NAME OF PROPOSED MONUMENT THE BARRY BUILDING

10. CONSTRUCTION DATE: 1951 FACTUAL: ☑ ESTIMATED: ☐

11. ARCHITECT, DESIGNER, OR ENGINEER MILTON H. CAUGHEY, AIA

12. CONTRACTOR OR OTHER BUILDER

13. DATES OF ENCLOSED PHOTOGRAPHS MARCH 10, 2007
(1 8X10 BLACK AND WHITE GLOSSY AND 1 DIGITAL E-MAILED TO CULTURAL HERITAGE COMMISSION@LACITY.ORG)

14. CONDITION: ☐ EXCELLENT ☑ GOOD ☐ FAIR ☐ DETERIORATED ☐ NO LONGER IN EXISTENCE

15. ALTERATIONS SEE ATTACHED PHYSICAL DESCRIPTION

16. THREATS TO SITE: ☐ NONE KNOWN ☑ PRIVATE DEVELOPMENT ☐ VANDALISM ☐ PUBLIC WORKS PROJECT
☐ ZONING ☐ OTHER

17. IS THE STRUCTURE: ☑ ON ITS ORIGINAL SITE ☐ MOVED ☐ UNKNOWN

SIGNIFICANCE

18. BRIEFLY STATE HISTORICAL AND/OR ARCHITECTURAL IMPORTANCE: INCLUDE DATES, EVENTS, AND PERSON ASSOCIATED WITH THE SITE (SEE ALSO SIGNIFICANCE WORK SHEET. 750 WORDS MAXIMUM IF USING ADDITIONAL SHEETS)

SEE ATTACHED

19. SOURCES (LIST BOOKS, DOCUMENTS, SURVEYS, PERSONAL INTERVIEWS WITH DATES)

SEE ATTACHED

20. DATE FORM PREPARED MARCH 24, 2007 PREPARER'S NAME DIANE M. CAUGHEY

ORGANIZATION FRIENDS OF THE BARRY BUILDING STREET ADDRESS 19757 INSPIRATION TRAIL

CITY TOPANGA STATE CA ZIP CODE 90290 PHONE (310) 455-9897

E-MAIL ADDRESS: diane.caughey@gmail.com

DESCRIPTION WORK SHEET

TYPE OR HAND PRINT IN ALL CAPITAL BLOCK LETTERS

THE BARRY BUILDING (NAME OF PROPOSED MONUMENT) IS A 2 (NUMBER OF STORIES) -STORY,

1950's CALIFORNIA MODERN (ARCHITECTURAL STYLE (SEE LINE 8 ABOVE)) RECTANGULAR (PLAN SHAPE (Click to See Chart)) PLAN COMMERCIAL/OFFICE (STRUCTURE USE (RESIDENCE, ETC.))

WITH A STUCCO (MATERIAL (WOOD SLIDING, WOOD SHINGLES, BRICK, STUCCO, ETC.)) FINISH AND WOOD (MATERIAL (WOOD, METAL, ETC.)) TRIM.

IT'S FLAT (ROOF SHAPE (Click to See Chart)) ROOF IS ASPHALT (MATERIAL (CLAY TILE, ASPHALT OR WOOD SHINGLES, ETC.)). WOOD & METAL (WINDOW MATERIAL).

METAL CASEMENT, WOOD FIXED & AWNING (WINDOW TYPE (DOUBLE-HUNG (SLIDES UP & DOWN), CASEMENT (OPENS OUT), HORIZONTAL SLIDING, ETC.)) WINDOWS ARE PART OF THE DESIGN.

THE ENTRY FEATURES A _____ (DOOR LOCATION (RECESSED, CENTERED, OFF-CENTER, CORNER, ETC.)),

FLUSH WOOD PANEL & WOOD & GLASS (ENTRY DOOR STYLE (Click to See Chart)) DOORS ADDITIONAL CHARACTER DEFINING ELEMENTS

OF THE STRUCTURE ARE COURTYARD GARDEN AT CENTER OF BUILDING, (IDENTIFY **ORIGINAL FEATURES** SUCH AS PORCHES (SEE CHART); BALCONIES; NUMBER AND SHAPE OF DORMERS (Click to See Chart)

SUNSCREENS, FRONT FACADE ON PILOTIS, METAL RAILINGS, (NUMBER AND LOCATION OF CHIMNEYS; SHUTTERS; SECONDARY FINISH MATERIALS; PARAPETS; METAL TRIM; DECORATIVE TILE OR CAST STONE; ARCHES;

CURVED EXTERIOR STAIRS (2), FULL-HEIGHT GLAZING IN WOOD CASEMENTS, (ORNAMENTAL WOODWORK; SYMMETRY OR ASYMMETRY; CORNICES; FRIEZES; TOWERS OR TURRETS; BAY WINDOWS; HALFTIMBERING; HORIZONTALLY;

SECOND FLOOR OPEN WALKWAYS. (SEE ATTACHED DESCRIPTION) (VERTICALLY; FORMALITY OR INFORMALITY; GARDEN WALLS, ETC.

SECONDARY BUILDINGS CONSIST OF A NONE (IDENTIFY GARAGE, GARDEN SHELTER, ETC.

SIGNIFICANT INTERIOR SPACES INCLUDE HIGH CEILINGS, FULL-HEIGHT GLAZING, STONE FLOOR (IDENTIFY **ORIGINAL FEATURES** SUCH AS WOOD PANELING; MOLDINGS AND TRIM; SPECIAL GLASS WINDOWS;

ORNATE CEILINGS; PLASTER MOLDINGS; LIGHT FIXTURES; PAINTED DECORATION; CERAMIC TIME; STAIR BALUSTRADES; BUILT-IN FURNITURE, ETC.

IMPORTANT LANDSCAPING INCLUDES TROPICAL PLANTS BROUGHT FROM AROUND THE WORLD BY ORIGINAL OWNER, DAVID BARRY. (IDENTIFY NOTABLE MATURE TREES AND SHRUBS)

CITY OF LOS ANGELES

SIGNIFICANCE WORK SHEET

TYPE OR HAND PRINT IN ALL CAPITAL BLOCK LETTERS

Complete One or Both of the Upper and Lower Portions of This Page

ARCHITECTURAL SIGNIFICANCE

THE BARRY BUILDING (NAME OF PROPOSED MONUMENT) IS AN IMPORTANT EXAMPLE OF

MID-TWENTIETH CENTURY CALIFORNIA MODERN (ARCHITECTURAL STYLE (SEE LINE 8)) ARCHITECTURE

AND MEETS THE CULTURAL HERITAGE ORDINANCE BECAUSE OF THE HIGH QUALITY OF ITS DESIGN AND THE RETENTION OF ITS ORIGINAL FORM. DETAILING AND INTEGRITY.

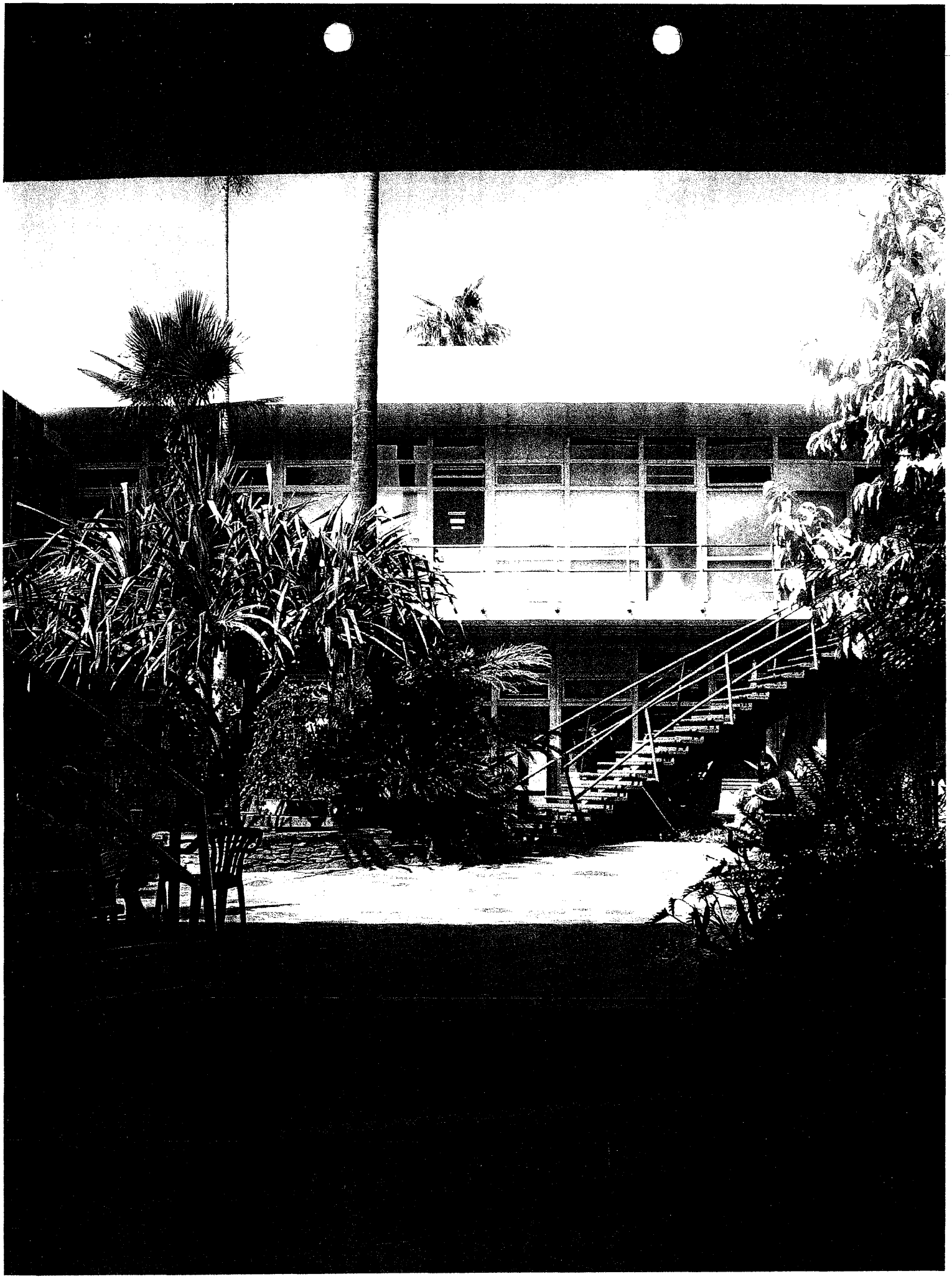
AND/OR

HISTORICAL SIGNIFICANCE

THE BARRY BUILDING (NAME OF PROPOSED MONUMENT) WAS BUILT IN 1951 (YEAR BUILT)

MILTON H. CAUGHEY, ARCHITECT (NAME OF FIRST OR SIGNIFICANT OTHER) WAS IMPORTANT TO THE DEVELOPMENT OF LOS ANGELES BECAUSE OF HIS CONTRIBUTION TO THE DEVELOPMENT OF MID-TWENTIETH CENTURY CALIFORNIA MODERN ARCHITECTURE. (SEE SIGNIFICANCE STATEMENT)


BOOKS



Physical Description

The Barry Building

The 13,300 square foot Barry Building located at 11973 San Vicente Boulevard in Brentwood is a two-story, flat-roofed commercial structure constructed in 1951. Designed in a mid-twentieth century California modern style, the building is organized around a central courtyard. The building opens to the street under a front façade raised one floor above the sidewalk on small steel pipe columns, pilotis style. The garden courtyard spreads out beneath the building creating a welcoming entrance off the street while maintaining an intimate sense of enclosure within the courtyard. The building is located on the property immediately adjacent to the street. There is a surface parking lot at the rear of the property connected to the courtyard by a small breezeway. Surrounding the open courtyard on two levels are small office suites. For the past 22 years Dutton's Brentwood Bookstore has occupied the majority of the ground floor spaces. Beneath the southeast corner of the raised front facade a small freestanding structure, currently used as a café, sits slightly eschew to the orthogonal grid of the building. Its twisted grid acknowledges the entrance to the on-site parking while directing pedestrians into the courtyard beyond.

The building is a composition of masses and voids, transparencies and solids. The four interior sides of the building create the void of the inner courtyard. The front and back building pieces read as separate but integrated horizontal masses overlapping the slightly lower side elements. The inner void of the courtyard becomes the heart and organizational center of the building, serving as both public circulation and an outdoor room. Two elegantly curving stairs, located on diagonal corners, modulate the courtyard space. Their concrete filled steel pan treads cantilever from a central concrete pedestal punctuated with triangular decorative openings. The stair and second floor walkway railings are supported by small steel pipes that tilt slightly inward. The railing is connected to the building with exposed metal plates and bolts. Such exposed structural detailing celebrates the workman's craft and becomes part of the overall building aesthetic

The building is primarily stucco over wood frame construction with floor to ceiling large grid wood windows on the majority of the interior facades as well as on the rear facade of the building. Smaller steel frame windows occur along the outside facades. The raised front façade consists of an unadorned stucco plane with a simple horizontal band of windows treated with operable vertical sunshades that provide environmental control for the south facing offices. Inside the courtyard solar control is addressed through full-height, horizontal wood louvers set away from the façade of the west facing offices. On the east interior façade an open decorative wood grid provides a compositional counterpoint to the louver screen opposite. Additional passive environmental features that occur throughout the building include overhangs for sun control and operable clerestory windows for natural ventilation.

The building is a series of visual layers and transparencies as one moves from the street through the pilotis entry and into the courtyard. The open street side acts as a picture frame inviting the eye under the building into the courtyard beyond. At the upper back of the courtyard a colorful Mondrian-like composition of geometric window grids pulls the eye deeper into the space. The rich tropical planting welcomes one to move into the heart of the courtyard where the transparency of the floor to ceiling glass allows one to see through the building to where, in the past, small garden patios existed behind each office. At the second floor, views through

the abundant glazing and over the roof tops reveal adjacent high rise buildings and local trees.

The building sits within a context of several other late-forties or early-fifties modern style buildings. To the east, Milton Caughey designed a group of small two-story shops across the driveway from the Barry Building. Built in about 1953, they are of a similar modern style and detailing. There is a tiny courtyard off the driveway allowing for entrances to a few rear shops and room for one large tree. Prior to the construction of the Barry Building and to its west, David Barry built a one-story modern-style building which housed the original office of David Barry Jr., but is now occupied by the Mano Gallery. When the courtyard building was built he moved to its second floor and still maintains his office there today. Sandwiched between the Barry Building and the gallery is an open floral shop with a plant nursery behind. The Bonner School, also a low profile modern era building, sits west of the gallery.

The Barry Building is generally in good condition with only a few changes made to the original building. In 1993 a small addition for receiving and storage was built at the rear of the building and the screens originally separating the rear patios from the parking lot have been removed. The men's bathroom has been remodeled, a few windows have been replaced with aluminum ones and some windows have been painted over. A low ramp has been added in the courtyard. Some of the original tropical landscaping remains in the courtyard today, however a large section of original planting at the center of the courtyard has been paved over with flagstone in order to accommodate a variety of outdoor activities.

Significance Statement

The Barry Building

The Barry Building in Brentwood is significant as an excellent example of mid-twentieth century California modern architecture and as a recognition of the architect's contribution, during his eleven short years of practice, to the architectural movement of the 1950's. The architect, Milton Caughey, was one whose work continued and advanced the tradition of the new architecture in Los Angeles, originally founded in the ideas of the late '20's and '30's and established as a California movement by Schindler and Neutra. The Barry Building embodies the aesthetic and stylistic features typical of the experimentation with new ideas that gave such vitality to the architecture of the period. The building reflects the architect's contribution to exploring variations on the ideas of space and design inherent in the California modern movement. According to Gebhard and Winter in *Guide to Architecture in Southern California*, the momentum of ideas and vitality that earlier enlightened the architecture of Los Angeles had run down by 1965. The Barry Building, built in 1951, is one of the rare commercial buildings left in West Los Angeles that exemplifies the period of great inspiration and ingenuity in California modern architecture.

The small commercial courtyard building was commissioned by developer David Barry and designed by local architect Milton H. Caughey, AIA. Built in 1951, the building exemplifies the concerns of the modern movement as it manifest in Southern California where the mild climate and ideals of a California lifestyle influenced the typology of the modern architecture practiced there. Milton Caughey's work explores interests similar to those of his contemporary masters, such as the unity of interior and exterior space, the abstraction and simplification of form, harmony with nature, healthy living and environmental considerations. The Barry Building embodies these modernist concerns as well as the individual creativity of the architect.

The Architect

Milton H. Caughey was born in 1911 in Pennsylvania. He received his BA from Amherst College in 1934 and his MFA from the Yale School of Architecture in 1938. In the summer of 1936 he worked for the influential Neo-classicist firm of McKim, Mead and White in New York. After graduation, he worked from 1938-39 for George Howe and later William Lescaze on buildings for the New York World's Fair. Howe and Lescaze designed the first International Style high-rise building in the United States, the Philadelphia Savings Fund Building, (PSFS) in 1932. They were early modern influences on the architect's work. In 1940 Caughey moved from the East Coast to Los Angeles in order to practice modern architecture in an open-minded and climate conductive atmosphere. He worked for March, Smith and Powell there until 1942 when he joined the U.S. Naval Reserve as a lieutenant. In 1947 he opened his own architectural practice in Los Angeles. From 1953—1957 he practiced in a partnership as the firm of Caughey and Ternstrom. Thereafter he practiced as a sole proprietor under Milton Caughey and Associates. In 1958, at age 46, Milton Caughey died suddenly of a heart attack, cutting short the promising career of a highly talented architect in mid-life.

Mr. Caughey received four Merit Awards for Excellence in Design and Execution from the Southern California Chapter of the American Institute of Architects. The first two awards in 1954 were for the Pachappa School and for the Hillburg residence at Capistrano Beach. He received two more awards in 1957 for the Riverside Juvenile Hall and the Monroe School.

Mr. Caughey's work was documented by the well-known architectural photographers Julius Shulman, Marvin Rand and Robert Cleveland. He served as a visiting critic and lecturer at the USC School of Architecture in 1953-54 and 1955-57. He was also a respected and honored watercolor artist and served as president of the Westwood Art Association in 1957.

The legacy of buildings Mr. Caughey left behind is significant given the short time in which he practiced. The Barry Building designed in 1950 was one of the architect's early commissions and one of his few commercial projects. Around the same time he designed the Barrington Playground (1950) and his own residence on Chenault St. (1951), both in Brentwood. Two of his better known California modern houses, the Garred house (1949) and the Goss house (1950) were included in David Gebhard and Robert Winter's classic *Guide to Architecture in Southern California,* published by the Los Angeles County Museum of Art (1965) which featured houses of the modern era by such contemporary masters as Gill, Eames, Saarinen, Neutra, Schindler, and Soriano among others. Schindler, Soriano, and Eames, an acquaintance of Caughey, were most likely the greatest contemporary influences on his work. Like Schindler, he used a romantic personalism in his design and use of space, and an individualism and ingenuity in his treatment of modern motifs.

All of his houses featured flat roofs, exposed wood post and beam construction, walls of glass, large sections of which slide open to patios where outdoor living provided harmony with nature and a healthy California life style. Transparency and visual movement through the spaces were attributes of the modern style he employed with finesse and skill in all his projects. His designs were distinguished by simplicity, clarity of structural systems, and unostentatious architectural charm.

Although he continued to design some houses, by 1953 his attention turned to larger scale work, primarily schools, detention homes and playgrounds, mostly in the Riverside area. The same modern features noted above that were hallmarks of his residential work were translated into these larger projects. Economy of costs through the careful use of materials, the plan organization, passive energy elements and easy maintenance became primary concerns of Caughey in the design of schools. He experimented with new structural materials like exposed metal trusses and diagonal bracing, indoor/outdoor classroom spaces, sun-shading, and covered outdoor hallways, and open classroom plans. Near the end of his life, Caughey ,like many modern architects of the time, designed using steel construction, modular systems and prefabrication. As noted in an LA Times article (1959), "When finished it [Rubidoux High School] will exemplify the latest techniques in the use of steel as a primary construction material." (article in appendix)

Significant schools that expressed his continued exploration of the ideas of the California modern typology were Mountain View Elementary School (Riverside 1954), Victoria Elementary School (Riverside, CA 1955), Hemet High School Gym, (Hemet, CA Mid-1950's), Ramona High School (Riverside, CA, associate architect 1956-7), Highland Elementary School (Riverside, CA 1957), and Rubidoux High School (Riverside, CA 1957-8). (photos in Appendix)

In an article in *Architectural Forum*, Oct, 1954 entitled "Young Architects: Ten outstanding buildings by some of the nations most promising young designers," Caughey's Pachappa School was featured noting: "... exterior metal louvers [occur] on both north and south glazing in classrooms to stave off sky glare as well as sun; both side walls of classrooms 100% glazed, horizontally stiffened with exposed X-rod bracing;..."'Bright colored and cheery, this 12-classroom school accepts the bright sun and California kids with unostentatious, but real, architectural charm." (articles in appendix)

The Building

The Barry Building designed in 1950 was one of the architect's few commercial projects. The building expresses the architect's clear interest in exploring modernist ideas. One of the unmistakable influences on the design was Le Corbusier, whose ideas Caughey first encountered while at Yale. The front façade of the Barry building is raised up on steel columns, pilotis style, with the garden spreading out beneath it, reminiscent of one of Le Corbusier's most famous houses, the Villa Savoye. Also influenced by the vernacular of Le Corbusier is the simple planer façade of the Barry building, devoid of decoration except for the horizontal bands of windows. One can see similar Corbusian influences in the CBS Radio Building in Hollywood, designed in 1937-38 by William Lescaze for whom Caughey had previously worked.

Milton Caughey, like Schindler before him, was familiar with and integrated into his designs, the kind of modern experiments in abstraction found in Europe. Interest in geometric abstractions in architecture stem from Neo-plasticism, a Dutch movement based entirely on the abstract geometric compositions of Mondrian. Neo-plasticism grew between 1917 and 1931 in Holland around the review called *De Stijl* and its universal idiom of elemental geometric forms, pure colors and extreme simplicity became an important influence on the formational ideas of the Bauhaus, headed by Walter Gropius. In the Bauhaus aesthetics were combined with practical function.

As an artist as well as architect, it is apparent that Mr. Caughey used these abstract compositional ideas in the Barry building as well as in his later schools. The most obvious use of pure geometric compositions occurs in the building facades where the grid of storefront windows, solid doors, sunshading devices, and the large grid screen become the elements of the composition. These grids interplay to create ever-changing abstract compositions as one moves around the building. The upper back wall of the courtyard works like a Mondrian painting, with the horizontal and vertical window grids forming a geometric composition of solids and voids, neutrals and colors. This type of geometric window composition was highly developed in the work of Charles Eames.

About the same time that ideas of simplification and abstraction were being developed in Europe, there was a parallel interest in simplicity in California. This understated simplicity was hinted at in the solid massing and plain surfaces of the California Mission style. The quiet monumentality of the Mission style so beautifully developed by Irving Gill, had its influence on Southern California modern architecture. The Barry building exemplifies these two influences that helped create a California modern style: the European movement of abstraction and the Mission style of simple surfaces, clear massing, and restrained decoration. In the building these modernist concerns are expressed by the way the four simple masses of the building that form the open courtyard are carefully articulated to read as separate

pieces. These separated masses create an interlocking composition of forms in space. The small twisted café element under the pilotis is intentionally held away from the ceiling plane to separate it from the floating mass above. In the Barry building the architect pushes beyond the modern ideas of his day by introducing the twisted grid into the pure geometry of the rectilinear courtyard. The skewed grid introduces a dynamic element into the building producing a moving composition of abstract geometric parts.

Another idea that was influenced by the modernists and individually developed by the architect was the expression of movement through the building. This sense of movement was achieved by framing the entry and developing layers that pull one through the space. The architect sensitively designed this experience of movement by employing such architectural devices as: the low steps set at a slight angle to the courtyard, the opening and closing down of space through planting, the transparencies that occur where glazing exists on both sides of a room or at glass corners. Additionally, he leads one's eye up and through the space by his use of composition in forms and flat surfaces, forced perspectives created by the curving stairs and the tilted railings.

The courtyard, although a basic organizational device, embodies another California Modernist ideal, that of healthy outdoor living. The unity of exterior and interior spaces, mastered by Neutra and emphasized in the modern houses of the time, is less commonly used here in a commercial setting. The ideals of fresh air, operable windows, outdoor patio space, sunlight with sun controls and a harmony with nature were brought into the workplace in the Barry building. Today, with the green movement in architecture, these features are again highly valued. The courtyard was originally a showcase for many tropical plants brought there from all over the world by the owner David Barry. His special interest in exotic plants resulted in a tropical nursery next door to the Barry building, and in Mr. Barry's influence on the planting of the Coral trees along San Vicente, themselves now an Historic Cultural Monument.

The Barry building is not only an excellent example of mid-twentieth century modern architecture but also an expression of an individual architect's creativity within the modern vernacular. Already mentioned is the introduction of the twisted grid which foreshadowed later contemporary design. The long shallow steps leading one into the courtyard are also set at an angle to the building grid. Like the twisting of the café building these steps provide a dynamic movement within the otherwise simple static orthogonal geometry of the courtyard. The architect designed elements of surprise, playfulness and movement into the calm clarity of the overall scheme. The architect's romantic personalism is expressed in the two elegantly curving stairways that grace the courtyard and gently guide one to the second floor. The playful triangular openings in the concrete stair bases add an abstract composition of their own while subtly echoing the diagonal grid established by the angle of the café. The unique inward tilting stair and walkway railings are another surprising and dynamic invention of the architect. In juxtaposition to their playfulness they express the aesthetic functionality of the modern movement in their straightforward bolted connection to the building.

Today the building has become a authentic piece of the Brentwood fabric, first housing Brentwood Books in 1960 and subsequently the much loved Dutton's Brentwood Books, which has been in the building since 1983. The courtyard provides a well-used community gathering place, where book signings and author's

readings occur daily. Just a few of the well known authors that have signed their books there are Al Gore, Ralph Nader, Carolyn See, Maria Shriver, Alan Shephard, Amy Tan, Gore Vidal, Kurt Vonnegut, Alice Walker, and Tom Wolfe. But it is the local community that uses the building as an intimate neighborhood resource. School fundraisers, community gatherings, noonday lunch-timers, book and café guests, all enjoy using the lush courtyard and surrounding businesses. Many of the businesses, including David Barry Jr., Margorie Braude and Ray Keller, have maintained their offices there for well over 30 years. The suites of the original barbershop and dentist office are still used as such. The building has been called both wonderfully funky and a sacred space. But no matter how each person experiences it, it has become a genuine landmark along San Vicente Boulevard in Brentwood, California.

APPENDIX

The Barry Building

Appendix : The Barry Building
Contents:

(1) Photographic portrait of Milton H. Caughey

(2) California State Architectural License (1942).

(3) AIA Award for Excellence in Design and Execution, Riverside Juvenile Hall (1957).

(4) Citizen-News (Wed. May 29, 1957) First place award for watercolors at Westwood Art Assoc. exhibit and Los Angeles Times (1958) "Architect heads WW Art Group."

(5) Los Angeles Times (July 16, 1958) "Architect Milton H. Caughey Dies."

6) Biography of Milton H. Caughey

(7) List of Architectural Projects

8) The Garred House, Hollywood Hills, CA. 1949 Photo: Julius Shulman.

(9 & 10) McCall Head, E "Adobe in the modern manner." The Garred House, Source Unknown.

(11) The Garred House, Hollywood Hills, CA. 1949. Photo: Julius Shulman.

(12) McCall Head, E. "Boards and batten blends with glass and brick." The Goss House, Brentwood heights, CA. 1950. Source unknown.

(13 & 14) "A plain rectangle is given a hospitable look," article by Ruth Corell, The Caughey House, Brentwood CA. 1951. Unknown Source.

(15 – 17) The Caughey House, Brentwood, CA. 1951 Exterior and interior views.

(18 - 20) Los Angeles Examiner (June 26, 1955) "Easy upkeep down by the sea," by Charles Bowen, (Cover & pg 10-11) The Hillburg House, Capistrano, CA. 1952.

(21) The Barry Building in 1951, photo: Robert C. Cleveland

(22) Archtectural Forum. (Oct, 1954). "Young architects: Ten outstanding buildings by some of the nations most promising young designers."(pg. 148) "School shielded from the sun."

(23 & 24) Pachappa School, Riverside, CA. 1953 (AIA Award) Photo: Julius Shulman.

(25) Victoria Elementary School, Riverside CA. 1953 (AIA Award) Photo: Julius Shulman.

(26 & 27) *Pacific Architect and Builder*. (Nov. 1958). "Back-to-back classrooms enlarged by courts." (pg. 18-19). Victoria School, Riverside, 1953. (AIA Award)

28) Los Angeles Times. (March 25 1956). "Three Riverside schools' dedication conducted."

(29 –31) Monroe Elementary School, Riverside, CA. 1955, (AIA Award) Photo: Marvin Rand.

(32) Bryant Elementary School, Riverside, CA. 1950's Photo: Robert C. Cleveland.

(33 & 34) Highland School, Riverside, CA. 1957. Photo: Marvin Rand.

(35) "Board Names Senior High Architects" Ramona High School, Riverside. Unknown source.

(36 & 37) "Plans for A New High School" by Bruce Miller, Ramona High, Riverside, CA 1956-7.

(38) Los Angeles Times. (Apr. 19, 1959). "Steel units featured at Riverside school." Rubidoux High School, Riverside, CA. 1957-8.

(39) Los Angeles Times. (Feb 9, 2007). " Much more than steel and wood," by Diane Caughey.

(40-42) List of well known authors that had book signings at Dutton's Brentwood Books.

(43) Santa Monica Mirror, (Feb. 15, 2007). "Save Our Bookstore."



(1) Milton H. Caughey

CALIFORNIA STATE BOARD OF ARCHITECTURAL EXAMINERS

DEPARTMENT OF PROFESSIONAL AND VOCATIONAL STANDARDS

KNOW ALL MEN BY THESE PRESENTS THAT:

MILTON HAZELTINE CAUGHEY

HAVING GIVEN SATISFACTORY EVIDENCE OF HIS FITNESS, IS HEREBY GRANTED THE RIGHT TO PRACTICE ARCHITECTURE AND TO USE THE TITLE ARCHITECT IN THE STATE OF CALIFORNIA AS PROVIDED IN THE ACT TO REGULATE THE PRACTICE OF ARCHITECTURE.

IN WITNESS WHEREOF WE SET OUR HANDS AND SEAL:

PRESIDENT

Ernest E. Weihe
SECRETARY

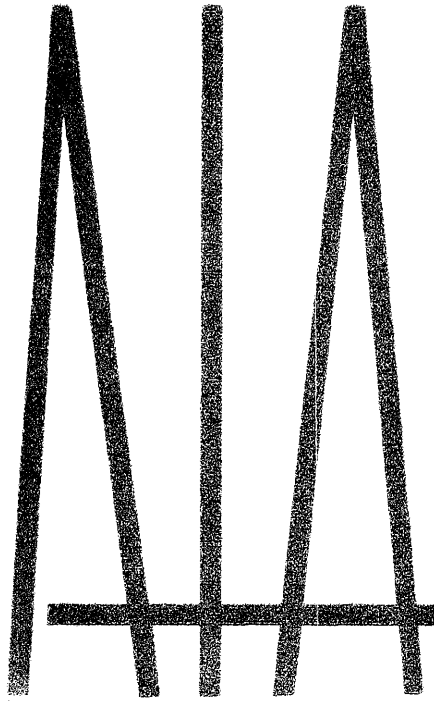
NUMBER C-429 PROVISIONAL CERTIFICATE NUMBER P-262, GRANTED JAN. 27, 1942

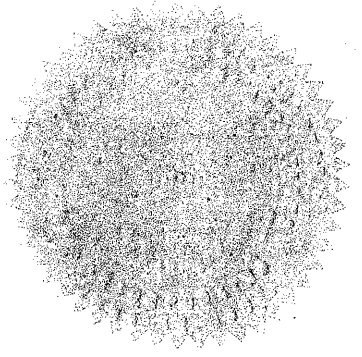
(2)

FOR EXCELLENCE IN DESIGN AND EXECUTION

to architect:
MILTON H. CAUGHEY

for:
JUVENILE HALL, RIVERSIDE





PRESIDENT

southern california chapter

1957 MERIT AWARD

Citizen-N

WEDNESDAY, MAY 29, 1957



GOOD WORK! — Milton H. Caughey (c), winner of first place for water colors in the Westwood Art Assn. art exhibit in the City Hall Tower, is shown with Joseph Cook (l), exhibitions chairman, and Curtis Oplighet, city art coordinator.



MILTON CAUGHEY

The 5-million-dollar pavilion housing the United States exhibition at the Brussels World's Fair is the largest circular building in the world without interior columns, according to the 1958 edition of the Americana Annual.

Architect Heads WW Art Group

Heading the executive board of Westwood Art Association for the new club year is Milton H. Caughey, Brentwood president, and well known architect and teacher.

Other new officers include Cecil V. Comara, vice president; Stephen Longstreet, program consultant; Agatha King, bulletin editor; Ida L. Platt, corresponding secretary; Nina Shepherd, recording secretary; Walter Wedlock, treasurer; Douglas Duder, exhibit chairman.

Also, Royette Dibbs, membership chairman; Alice L. Patt, publicity; Onis Rice, refreshments, and Mrs. Janet Caughey, social chairman.

BOARD MEETING

Caughey announced that the executive board meetings have been scheduled for the second Thursday of the month at 7:30 p.m. Meeting tonight will be at the home of Mrs. Platt, 11735 Roxbury Dr., Beverly Hills.

Three members of the association are exhibiting their water color, oil and casein paintings at the Security-First National Bank in Prudential Square. They are Eleanore Haddock, Nanon Olman, and Ed Turner. The exhibit will continue for through Aug. 11.

(4

Architect Milton H. Caughey Dies
Los Angeles Times (1886-Current ...2); Jul 16, 1958; ProQuest Historical Newspapers Los ...geles Times (1881 - 1985)
pg. 26

Architect Milton H. Caughey Dies

Milton H. Caughey, architect, died suddenly in his home at 11773 Chenault St., Brentwood, early yesterday. He was 46.

A native of Warren, Pa., and a graduate of Amherst College and the Yale Graduate School, Mr. Caughey began his architectural career in Los Angeles in 1945 after service as a Navy lieutenant in World War II.

Mr. Caughey was the winner of four Southern California honor awards from the American Institute of Architects. He was president of the Westwood Art Association, president of the West Area Co-ordinating Council of Los Angeles, a member of the architectural board of the Episcopal Diocese of Los Angeles and fleet captain of the South Coast Corinthian Yacht Club.

Mr. Caughey leaves his widow, Mrs. Janet Disque Caughey; two daughters, Linda and Diane; his parents, Mr. and Mrs. Francis Caughey of Warren, Pa.; and a sister, Mrs. Jane Spicer of Rhode Island. Funeral arrangements are pending.

Woodbury Fete Set

Woodbury College will observe its 75th anniversary Friday at a Founders Day open house starting at 9 a.m.

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NOT YET PROOFREAD

JUN 23 1954

CAUGHEY, Milton Hazeltine, architect, was born in Bellevue, Pa., Dec. 20, 1911, son of Francis Morrow and Grace (Hazeltine) Caughey. Milton H. Caughey received his preparatory education at the Kiskiminetas Springs School, Saltzburg, Pa., and was graduated A.B. in 1934 at Amherst College, and B.F.A. in 1938 at Yale University, where he also did graduate work in architecture. Meanwhile, he was a draftsman for E. A. & E. S. Phillips, architects of Meadville, Pa., in 1935 and for McKim, Meade & White, architects of New York City, in the summer of 1936. He did architectural work in 1938-39 for George Howe and later for William Lascaze, both architects of New York City, in connection with buildings for the New York World's Fair of 1939-40. He was a draftsman for Anthony Lord, Asheville, N.C., in 1939-40, for Albert Kastner, Albany, Ga., in the latter year, and for Marsh, Smith & Powell, Los Angeles, Calif., during 1940-42. After doing architectural work on a U.S. Navy building at San Pedro, Calif., in 1942-43, he was commissioned a lieutenant in the U.S. Naval Reserve, in which capacity he served during the Second World War as an instructor in damage control at Cornell University. For a few months in 1946 he worked as a draftsman for Gordon Kaufmann, Los Angeles. From the latter year until 1953 he conducted an independent architectural practice in Los Angeles, and during 1953-57 he was a member of the architectural firm of Caughey & Ternstrom in that city. Thereafter until the close of his life he practiced as Milton Caughey & Associates. He chiefly designed schools, playgrounds, detention homes, and private residences. His principal projects were the Barrington Playground in Brentwood, Calif. (1950), Riverside County (Calif.) Juvenile Hall (1955), and a number of schools in Riverside, Calif., including the Pachappa School (1953), Mountain View School (1954), Monroe School (1955), Victoria School (1955), and Highland School (1957). He also served as associate architect on the design of Ramona High School in Riverside (1957), and at the time of his death he was working on plans for Rubidoux High School in that community. Caughey served as a visiting critic and lecturer at the University of Southern California School of Architecture in 1953-54 and again during 1955-57. He was the recipient of four honor awards from the Southern California chapter of the American Institute of Architects for buildings designed by him: two in 1954 for the Pachappa School and for the Hillburg residence at Capistrano Beach, Calif., and the other two in 1957 for the Monroe School and the Riverside County Juvenile Hall. Additionally, Caughey served in 1948 as president of the West Los Angeles Coordinating Council for Youth, and from 1955 until his death he was a member of the architectural planning committee of the Episcopal Diocese of Los Angeles. He was a member of the American Institute of Architects, Delta Kappa Epsilon, and the Kiwanis Club of Westwood Village, Calif. His religious affiliation was with All Saints Episcopal Church, Beverly Hills, Calif., and he was a Republican in politics. His pastimes included the study of history and archaeology, hunting, fishing, and sailing, and in connection with the last-named he served as fleet captain of the South Coast Corinthian Yacht Club at one time. An accomplished painter in the medium of water color, Caughey received an award for the best water color in the 1957 art exhibit of the Westwood Art Association, which he served as president in the following year. He was married in Beverly Hills, Calif., Oct. 30, 1937, to Janet, daughter of Kenneth Hulbert Disque of Erie, Pa., an engineer, and had two daughters, Linda and Diane. Milton H. Caughey died in Los Angeles, Calif., July 15, 1958.

Milton H. Caughey: Architectural Projects

Incomplete list

Residential Projects

Garred House, Hollywood Hills, Los Angeles, 1949

Goss House, Brentwood Heights, Los Angeles, 1950

Spicer House, Weekapaug, Rhode Island, 1950

Caughey House, Chenault St, Brentwood, Los Angeles, 1951

El Medio House, Pacific Palisades, 1950-'52 (later bought and remodeled by Eric Owen Moss as the 708 House)

Hillburg House, Capistrano Beach, CA 1952 (AIA award)

Mudd House, Trancas Beach, Malibu, 1952-'54

Institutional and Commercial Projects

Barry Building, San Vicente Blvd. (AKA The Dutton's building), Brentwood, 1951

Barrington Playground, Brentwood, Los Angeles, 1950

Pachappa Elementary School, Riverside, CA 1953 (AIA award)

Addition to Lowell School, Riverside, CA Early 1950's

Barry Building (adjacent bldgs) Brentwood, CA 1953 (not apart of historic monument)

Mountain View Elementary School, Riverside 1954

Monroe Elementary School, Riverside, CA 1955 (AIA award)

Victoria Elementary School, Riverside, CA 1955

Riverside Juvenile Hall, Riverside CA 1955 (AIA award)

Bryant Elementary School, Riverside, CA Mid-1950's

Walgrove Elementary School, Venice, CA Mid-1950's

Hemet High School Gym, Hemet, CA Mid-1950's

El Sereno Playground, Los Angeles, CA Date unknown

Caughey/Maston Offices, 920 La Cienega Blvd, Beverly Hills, with Maston, 1956

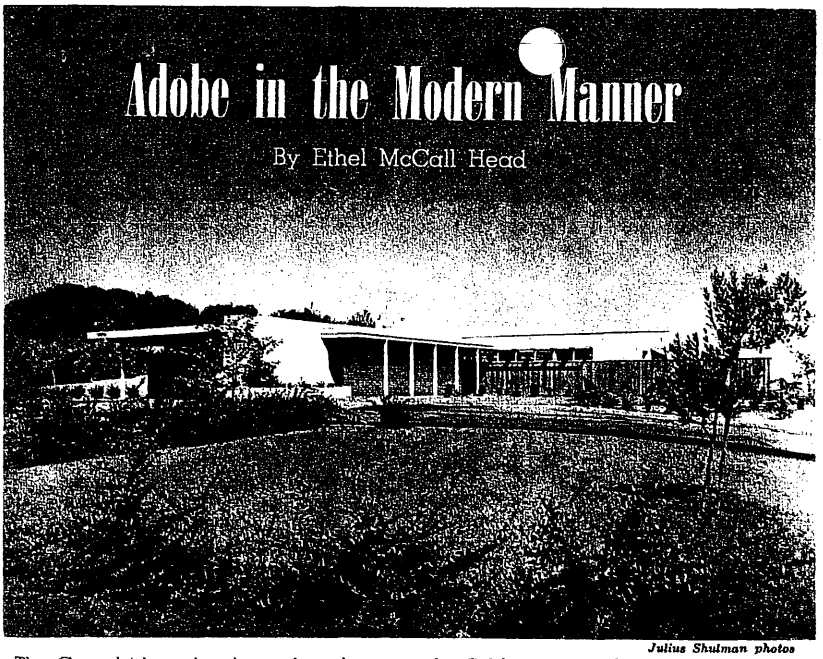
Ramona High School, Riverside, CA, associate architect 1956-7

Highland Elementary School, Riverside, CA 1957

Rubidoux High School, Riverside, CA 1957-8

Adobe in the Modern Manner

By Ethel McCall Head



Julius Shulman photos

The Garreds' long, low house has character of a California ranch house but is Modern in treatment. Adobe brick is grayed-grape color, fir of bedroom wing is tobacco brown.



Above: Window wall of concrete and brick-floored living area overlooks the valley. Below: From the terrace one looks into living area, down hall past entrance to study.



THIS long, low house set on a plateau offering magnificent views of city, mountains and valley has a character reminiscent of the Early California ranch house. Built of adobe brick and Douglas fir it has a crisp Contemporary treatment and borrows nothing from the past except honest simplicity.

Mr. and Mrs. Robert Garred wanted a one-story house for easy family living and that is exactly what their architect, Milton Caughey, has given them. Though the home is built of adobe brick and wood with roofed porches, its handling is definitely Modern.

Set on a plateau above the road with magnificent vistas in all directions, the house hugs its site and the landscaping by Eckbo, Royston & Williams makes the building one with the natural beauty of its location.

The drive from the street below ends in a spacious motor court providing plenty of parking for guest cars. The carport is shielded from the front by a bold adobe brick wall with planting pocket.

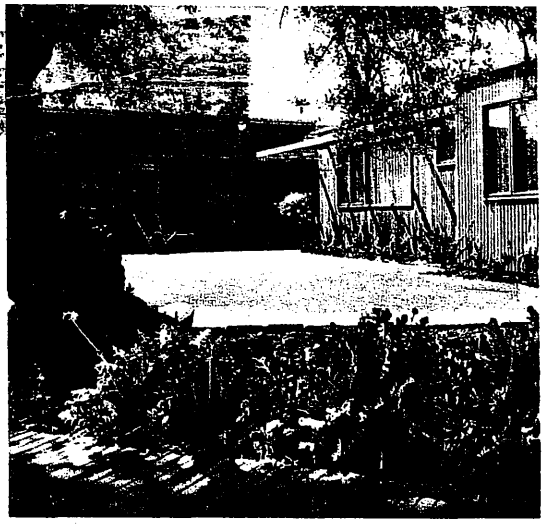
The guest steps from the car to a long covered and bricked porch leading to the entry, or the members of the family may step from the automobile in the carport, under cover, and go through an opening to the same passageway.

Exterior adobe brick is painted a grayed grape tone with posts and fascia of a matching color. The bedroom wing of vertical grain Douglas fir is stained a natural tobacco brown and offers interesting textural contrast to the masonry. The architect has used the same color for the same material inside and outside the house.

This same principle is applied to the flooring material. The covered entrance passage is bricked and the bricks enter the house to form an entry hall, continue across the end of the living area to become one with terrace paving, breezeway to bedroom wing and west terrace. This creates a flow of interior and exterior space.

From the entry door, one may turn to the left down a short hall which leads to darkroom and study-guest room and bath. This seclusion of the study which doubles as guest room from the rest of the

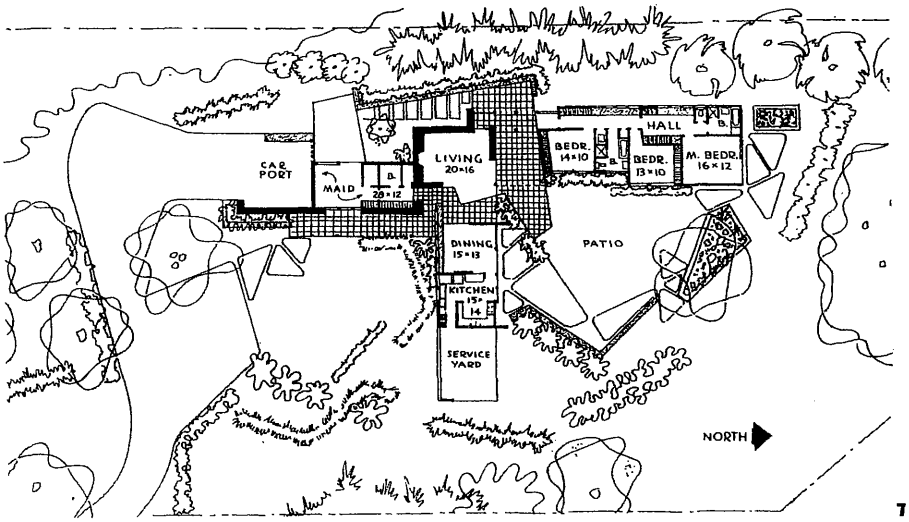
(Continued on Page Twelve)



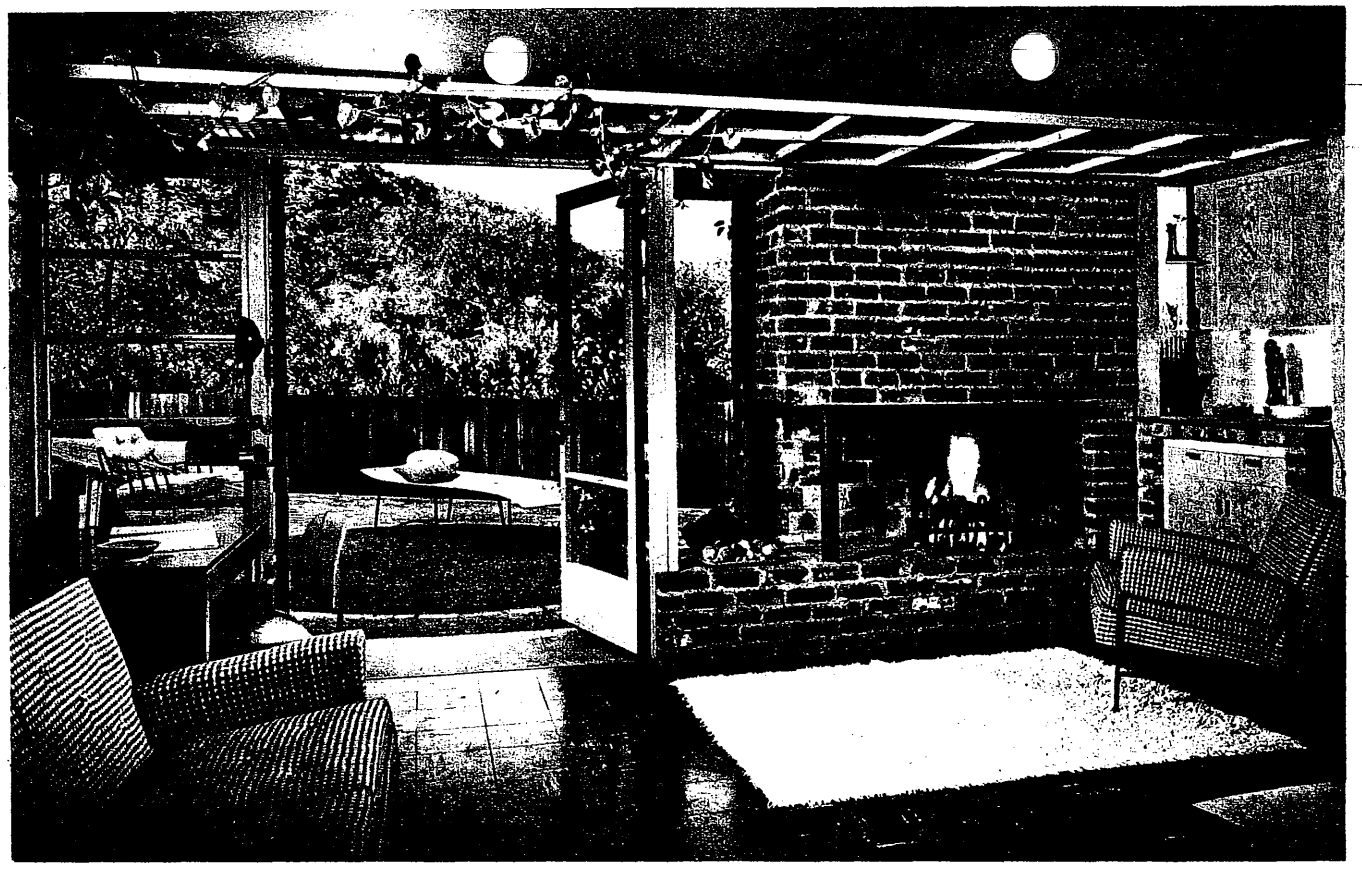
At right angles to the glass-walled living-dining area is a bedroom wing, built of vertical grain Douglas fir.



Row of transom windows runs above wood storage wall beyond dining area.



(9) Garred House 1949



This present living room will later become the den. On this side it opens on the sun terrace; on the opposite side onto a barbecue terrace.

Below: The barbecue terrace facing the front entrance, right rear, will not be affected by additions of the future; entrance terrace is radiantly heated.



Julius Shulman



Plastic panel above table just inside entrance door conceals the kitchen area.

Sliding screen separates kitchen and den; window opens to barbecue area.



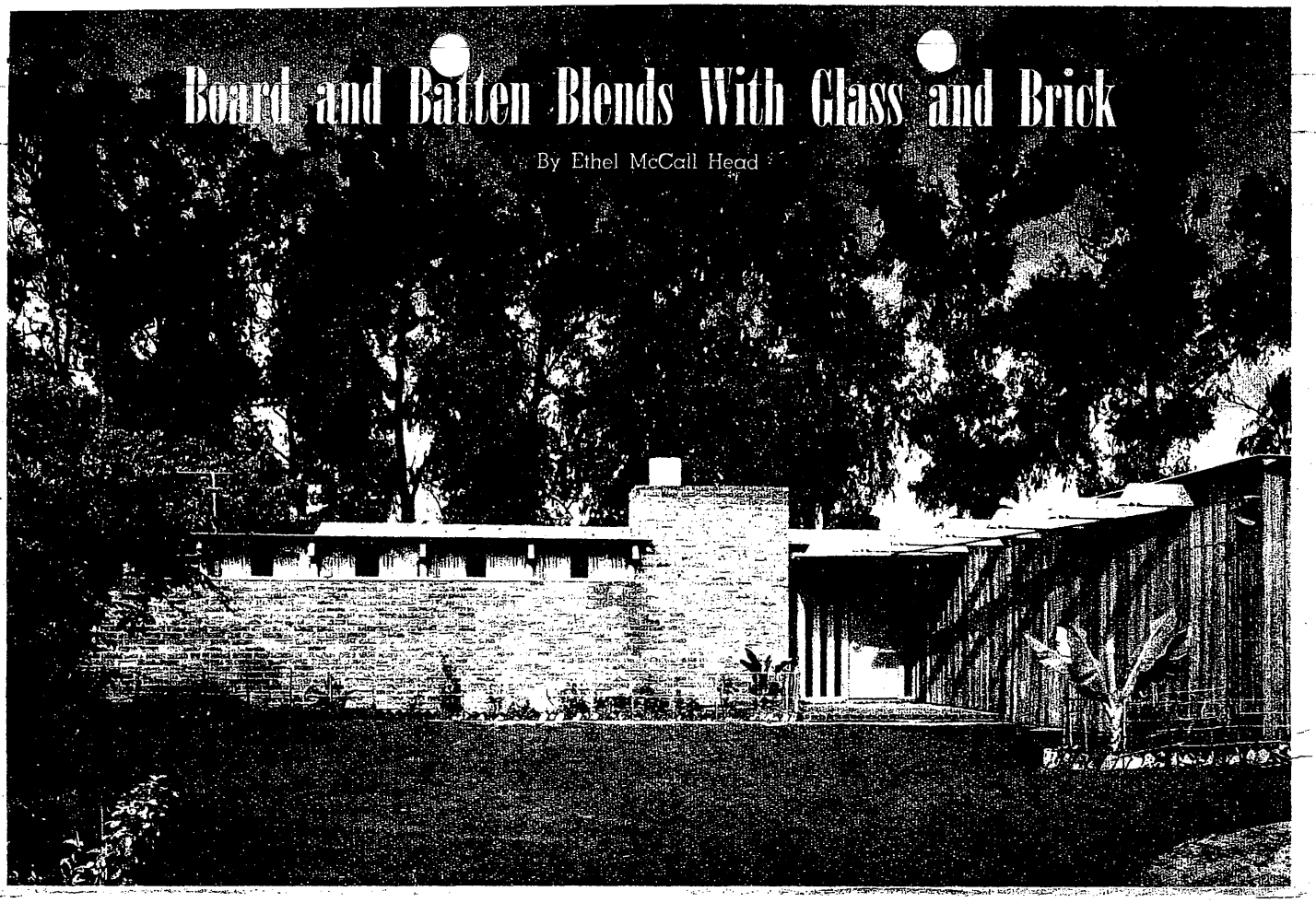
(10) Garred House 1949



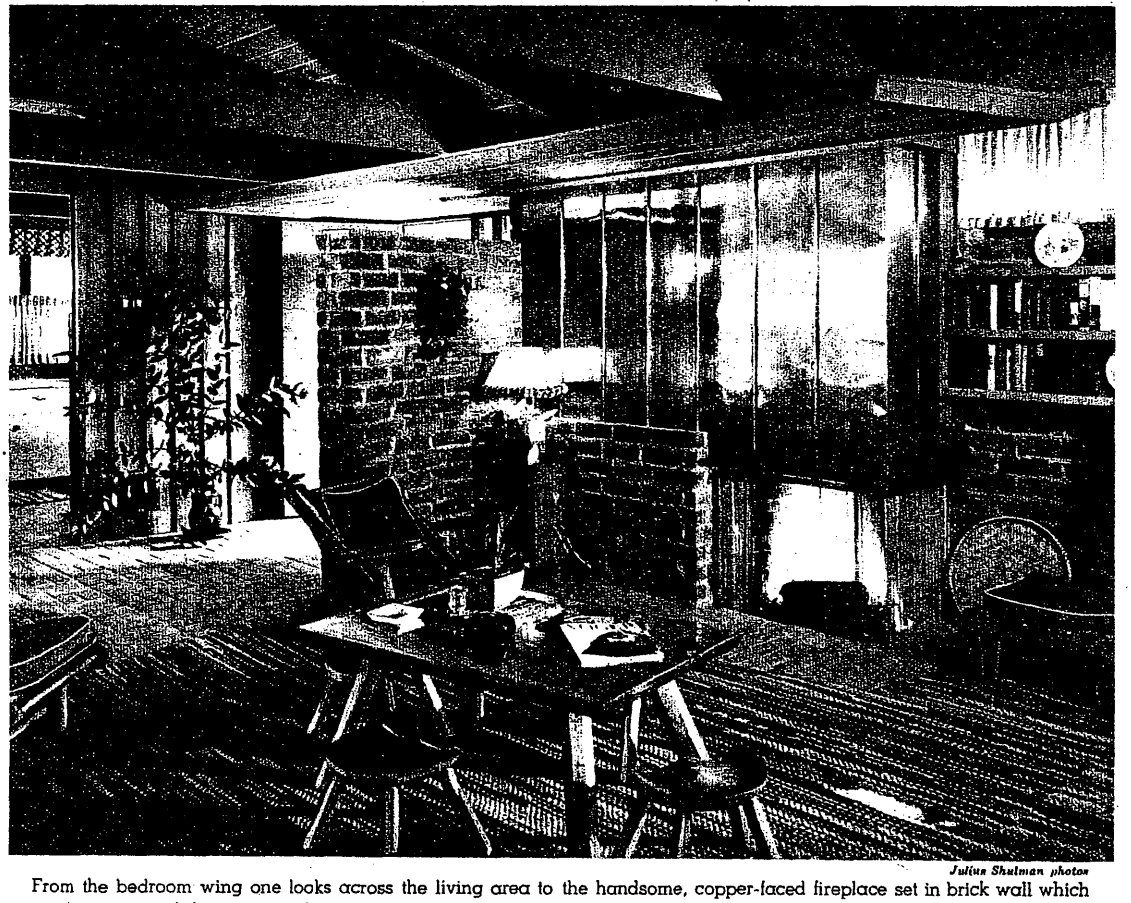
(11) Garred House 1949

Board and Batten Blends With Glass and Brick

By Ethel McCall Head



The redwood garage wing is at the right of the off-street motor court; brick fireplace wall extends under transom windows to give privacy from street.



Julius Shulman photos

From the bedroom wing one looks across the living area to the handsome, copper-faced fireplace set in brick wall which continues around the corner to form a partial partition concealing entrance door; kitchen can be glimpsed across the hall.

BOARD and batten construction used to be synonymous with ranch house design. But here is a house built largely of redwood board and batten combined with glass and brick in the Modern manner.

Privacy from the street, outdoor living on a well wooded site and easy housekeeping have been provided in an area of 1670 square feet. Milton Caughey, AIA, planned this house for Mr. and Mrs. Frank Goss and their baby daughter with emphasis on their informal way of living.

A spacious motor court off the street eliminates a lot of front yard garden maintenance. The board and batten redwood garage and kitchen wing are set off by a chimney of generous proportions. A continuing brick wall extends across the front of the house with only transom windows under a wide roof overhang. Ultimate privacy from the street is thus achieved in this house which opens with walls of glass to both back and side terraces.

A glance at the floor plan will show the brick of the entry porch continuing into the house, across the end of the living area, the adjoining kitchen and counter and flowing out to the rear terrace. Such a bricked area makes very practical flooring for main circulation and is partic-

(Continued on Page Ten)

The plain rectangle is given

SPECIFY a simple rectangle and you can have the least costly of all home plans. Specify a simple rectangle and you can also hand your designer his greatest challenge. No plan is more demanding of true inventive thinking, and no house can look more ordinary when such thinking is not applied.

The designer of this house met the problem head on and produced what we think is a home with exceptional appeal.

The living area dominates the plan. It is spaciously light and has a furniture arrangement that suggests an atmosphere of quiet enjoyment — of leisurely family conversation. (Perhaps the absence of a TV screen contributes to this quality. It is there, but well concealed behind the paneling beside the fireplace.)

Though a house for essentially sociable people, it provides the privacy each of us wants and needs . . . a place for solitude and relaxation. If you love children but still cherish a life of your own, it's a comfort to know that a sliding door can separate the active and quiet halves of the house.

The kitchen is a large, warm and friendly room. It is cut off from view from the living room but its furniture-type cupboards continue on around to encircle the dining area.

The only breaks in the basic rectangular outline of the plan are made by the two bathrooms and the utility room. Their angle gives the front entrance an added degree of protection from the street. The door is further set apart by a planter and an airy divider marking the roof extension.

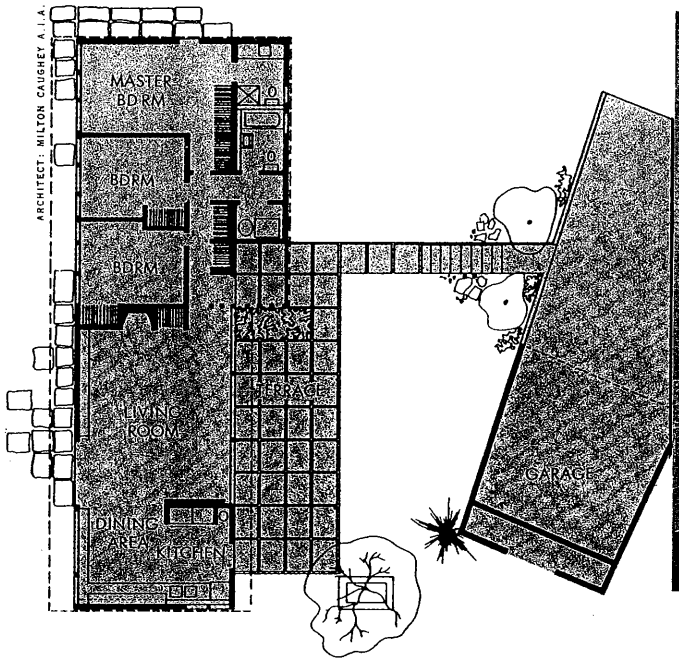
To further camouflage the regularity of the plan, the garage and fences wing out at slight angles from the house, sheltering the terraces and playing up the unsymmetrical shape of the lot.

Though modest in scale, by aiming at durable styling, the architect has linked good design to serene simplicity, a practical arrangement of space and all the facilities essential to gracious living.



a hospitable look

BY RUTH CORELL

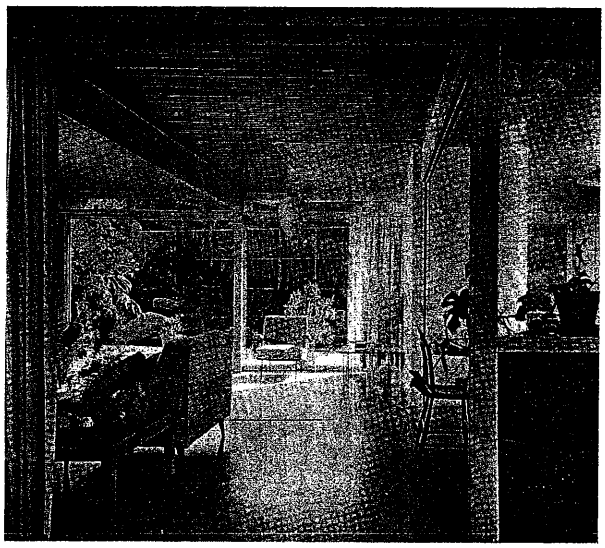


The plan tells the story. It is a neat rectangle with the exception of the bathrooms and heater room. The living and dining-kitchen areas span the width of plan. Bedrooms are all conveniently arranged on the short hallway



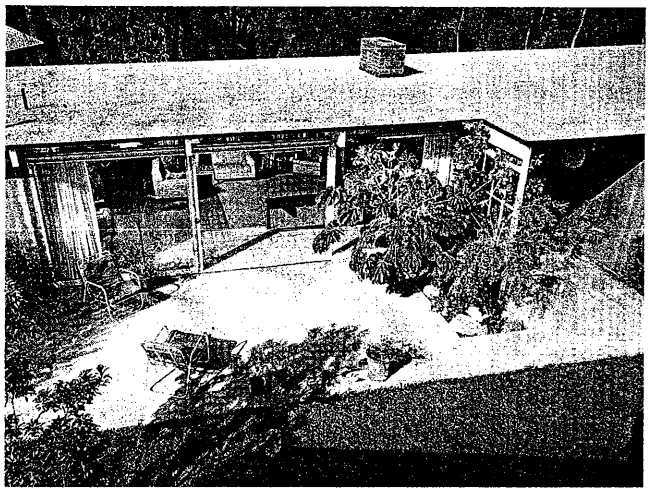
The back terrace off the dining room and kitchen is favored by the family for outdoor meals. It is paved in cement squares, partially protected by the wide eaves and sheltered from neighbors by rustic wood fence and plants

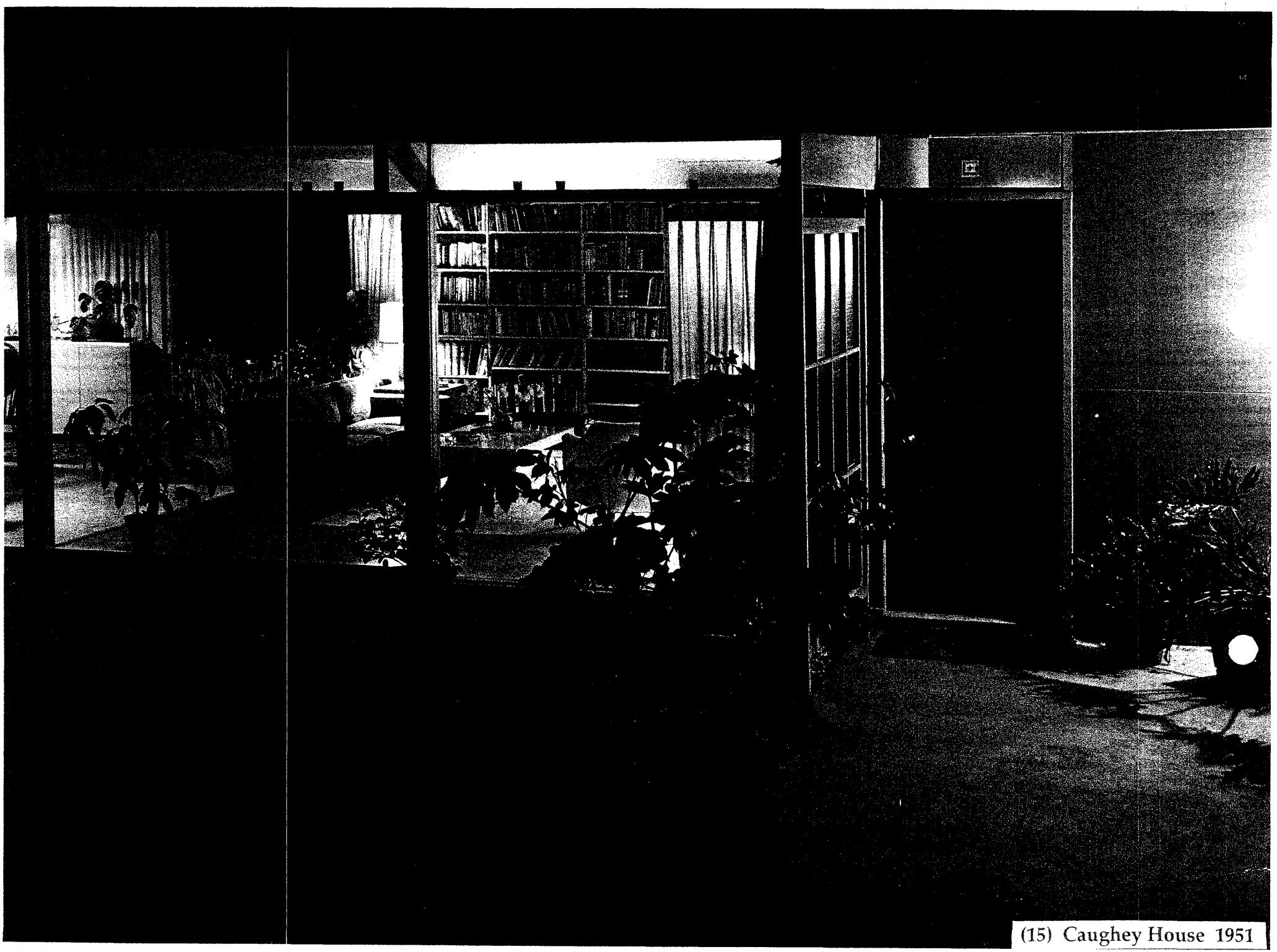
The living room is planned for active or quiet hours. There are books with lights to read them by. Beside the fireplace are TV and sound systems. But furniture is grouped socially if conversation is more to family tastes



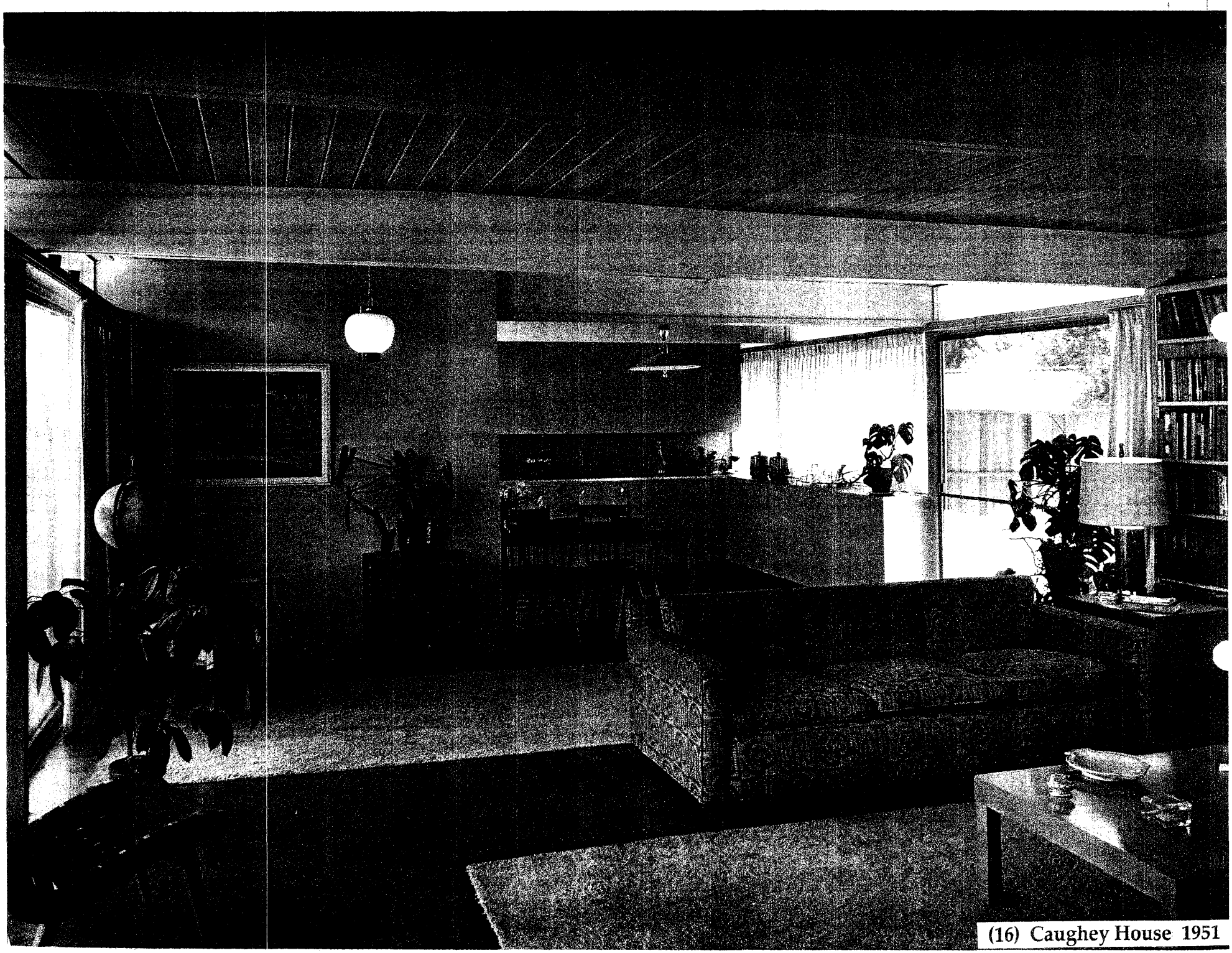
Behind the chair at the right is a slender black line marking the sliding door that can completely separate the kitchen-dining area from the living room. Another sliding door shuts off the hallway leading to the three bedrooms

An overscale glass door may be pushed aside in good weather to merge indoor and outdoor living rooms. This view of the front terrace and main entrance shows how planter and grid divider insure privacy for relaxation

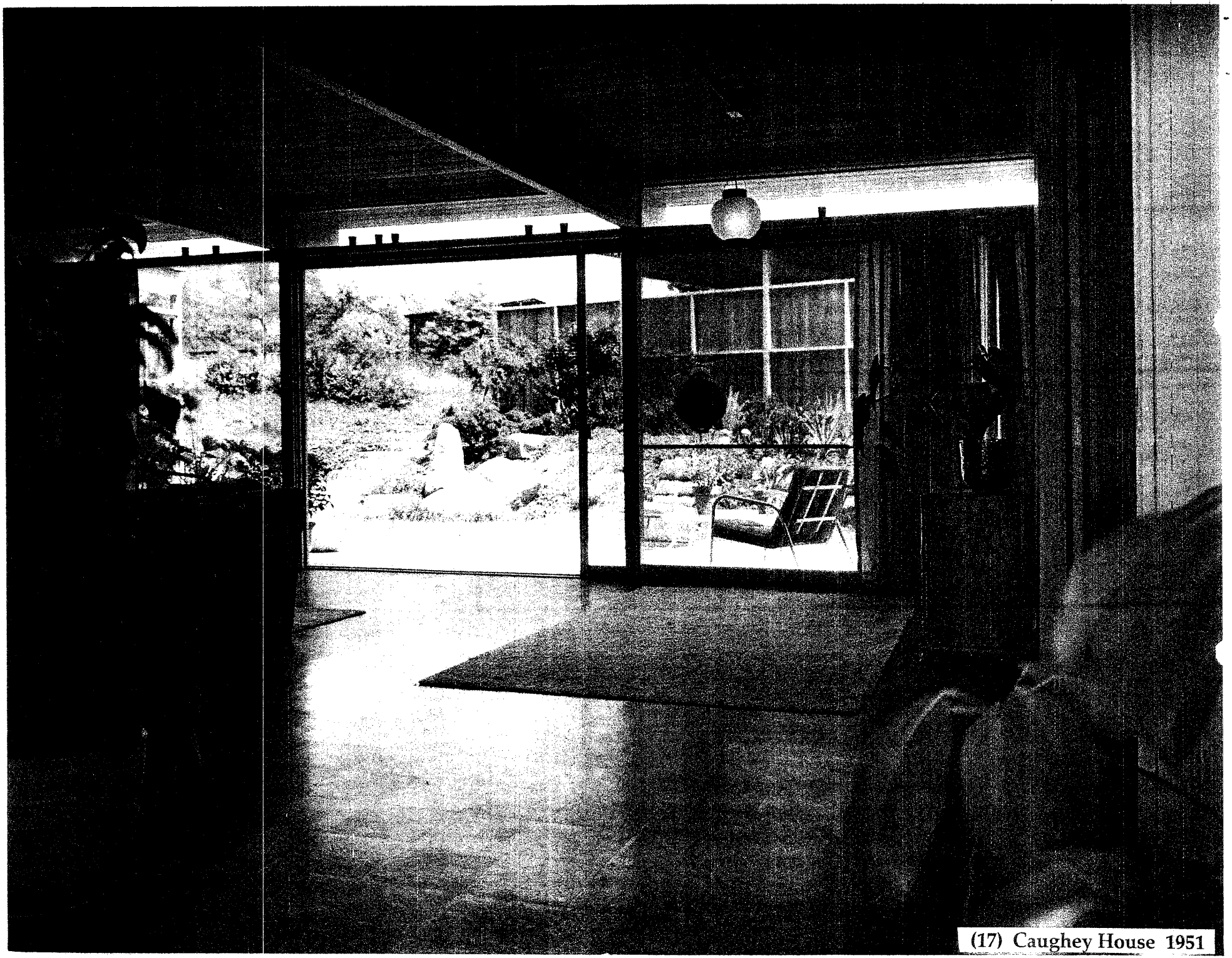




(15) Caughey House 1951

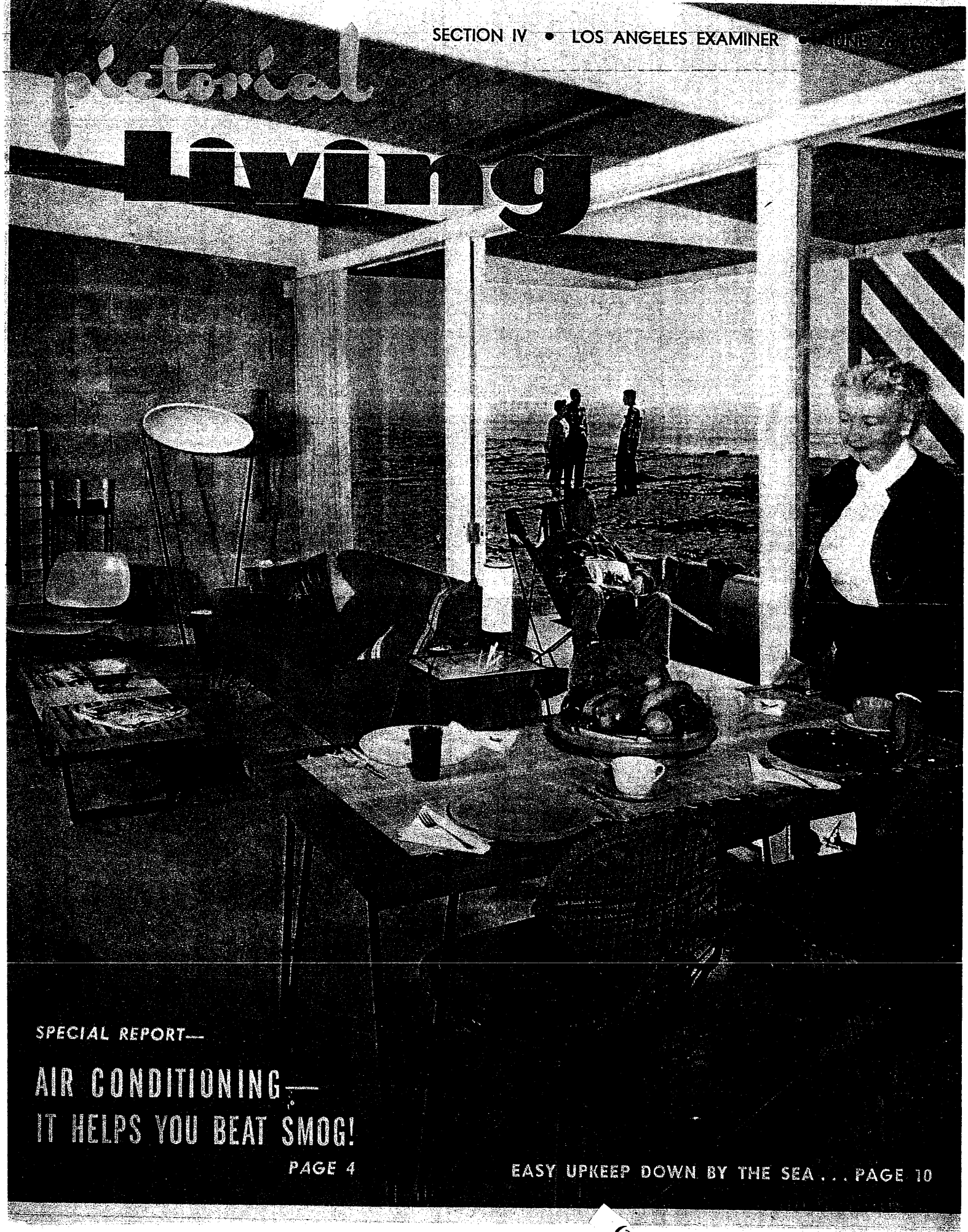


(16) Caughey House 1951



(17) Caughey House 1951

Pictorial Living



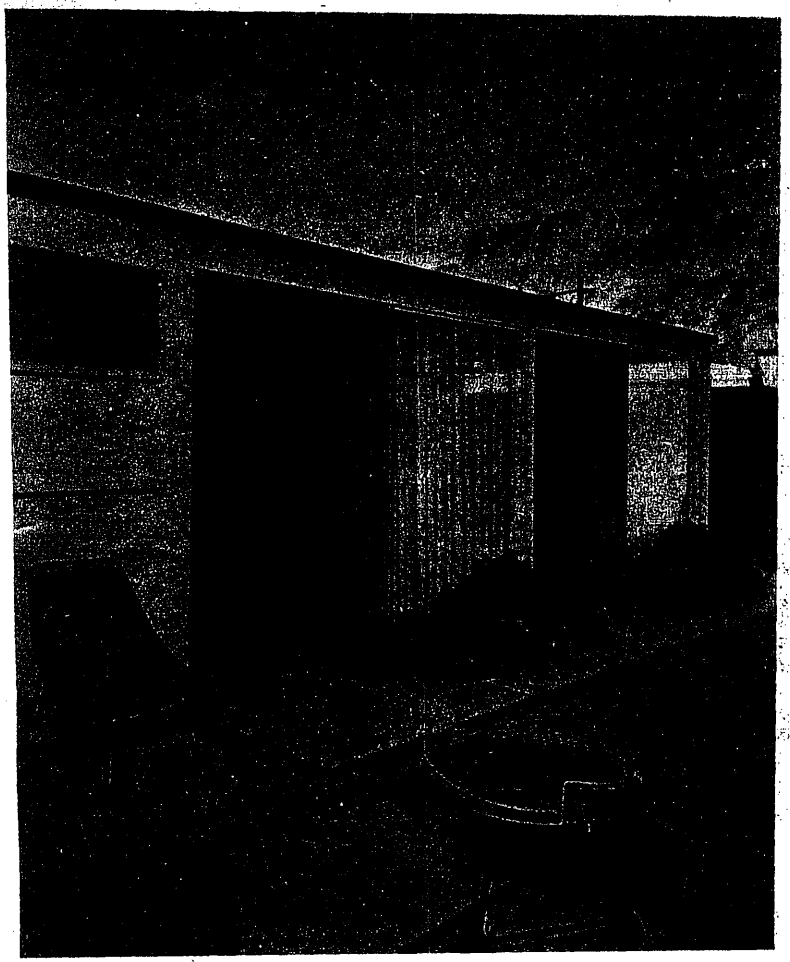
SPECIAL REPORT—

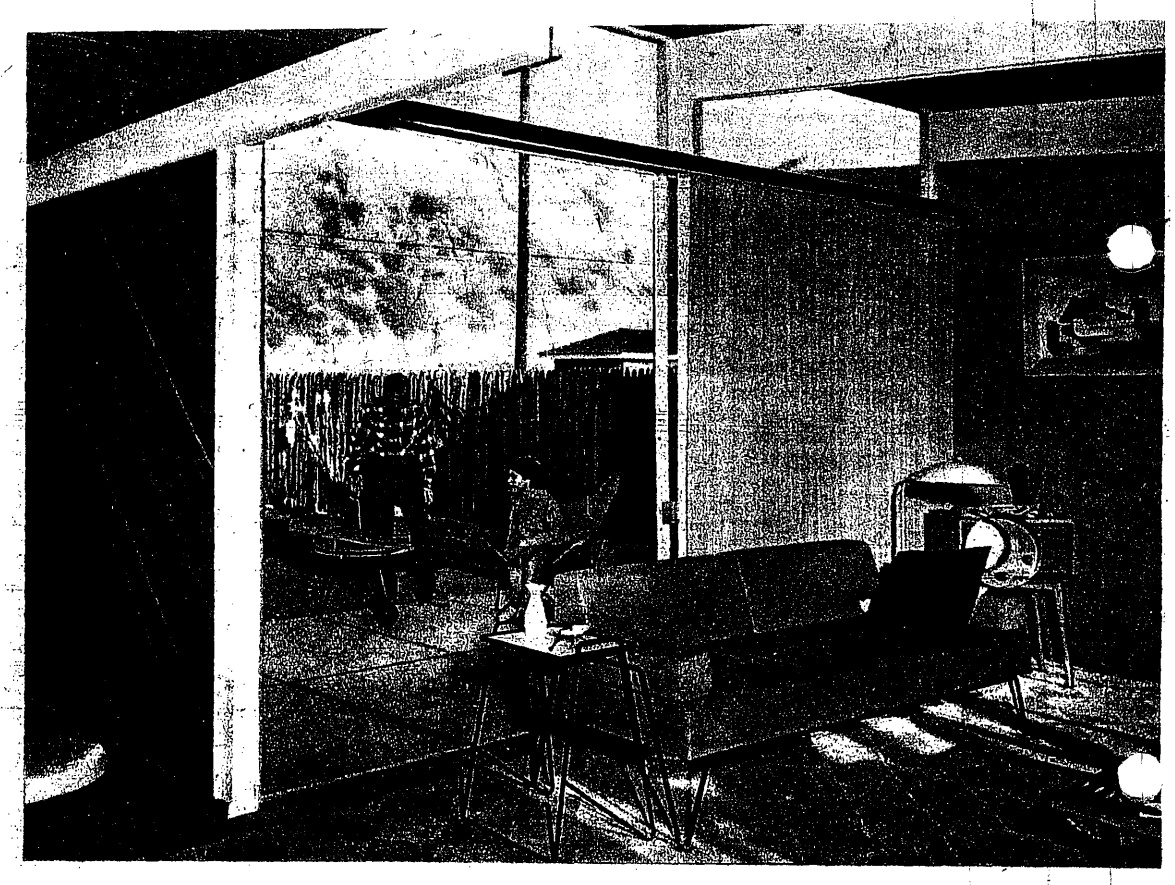
AIR CONDITIONING— IT HELPS YOU BEAT SMOG!

PAGE 4

EASY UPKEEP DOWN BY THE SEA . . . PAGE 10

(Q&) Ilburg House, 1952 (AIA Award)





CONCRETE paves half the patio; the rest is sand. Area of the house is 959 square feet and it's placed sidewise

GLASS is fixed or slides in frames of painted steel. The high side of roof is pitched inland; low side is to

(19) Hillburg House 1952 (AIA Award)



(20) Hillburg House 1952 (AIA Award)



(21) Barry Building 1951



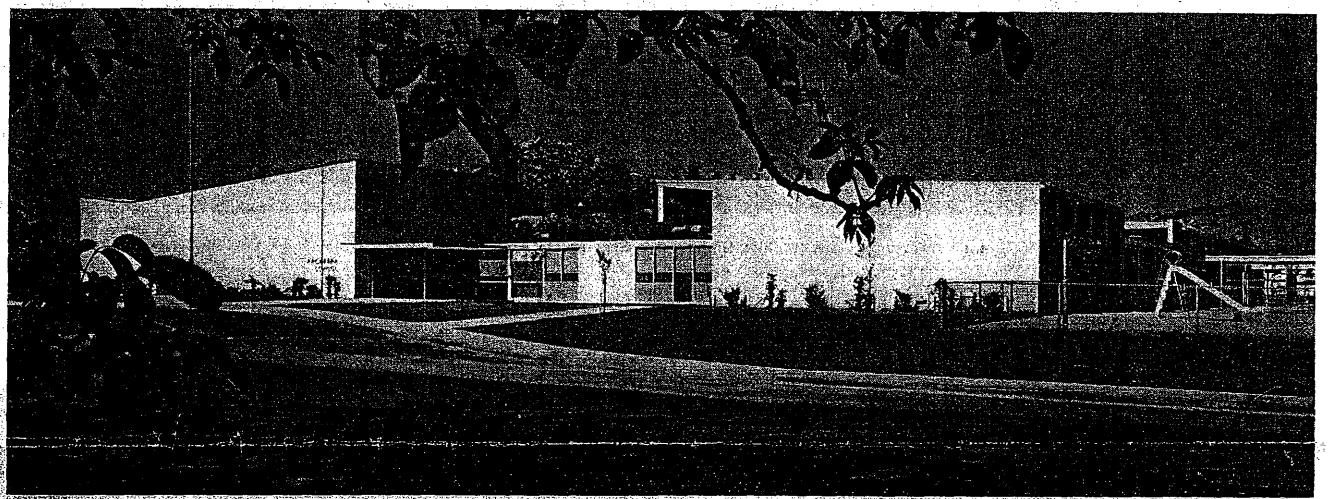
SCHOOL SHIELDED FROM THE SUN

CAUGHEY & TERNSTROM, both under 40, have been partners two years. TERNSTROM graduated from the University of Southern California in 1940, also spent more than three years in the navy. CAUGHEY graduated from Yale Architectural School in 1938, went West to work on the coast and serve three years in the navy.

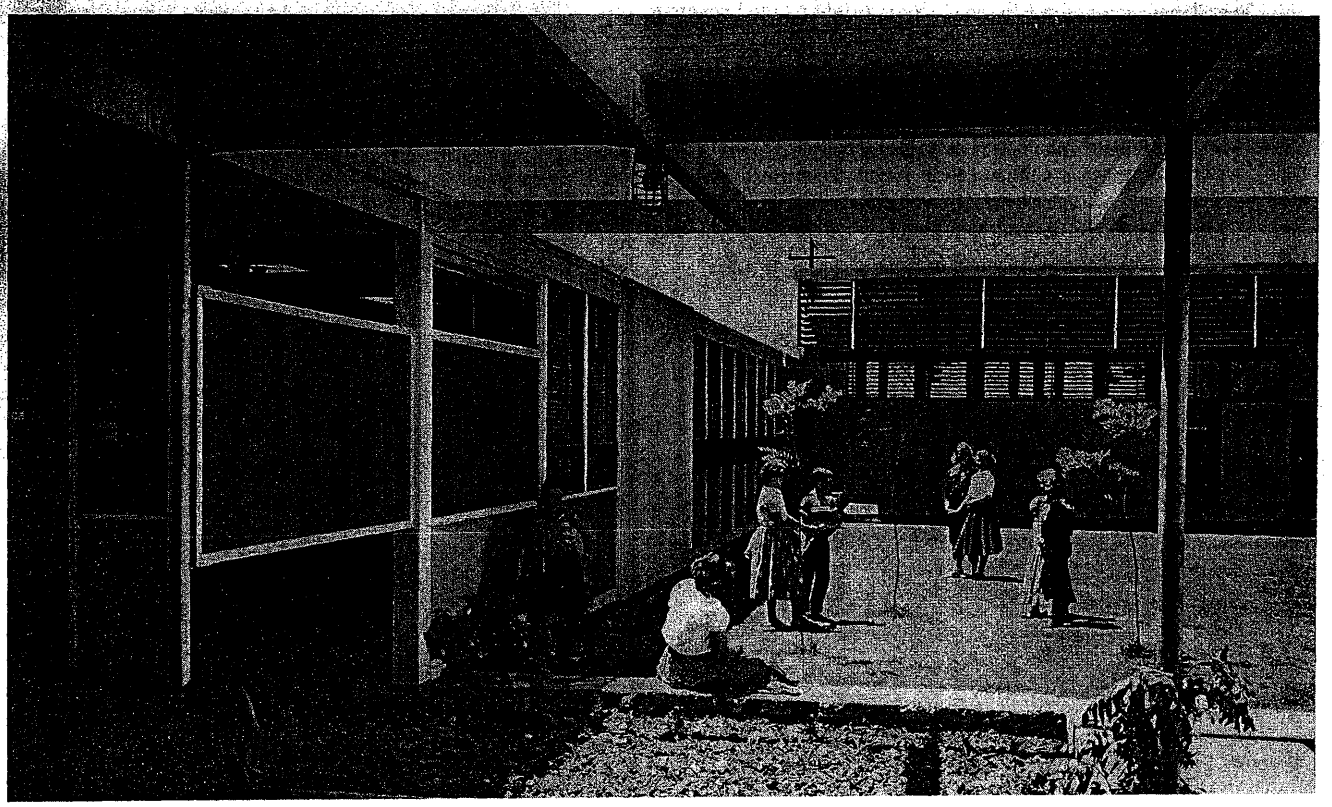
PACHAPPA SCHOOL, Riverside, Calif.
M. H. CAUGHEY & C. C. TERNSTROM, architects
HEERS BROTHERS, general contractors
WILLIAM PORUSH, structural engineer
HILBURG, HENGSTLER & TURPIN, mechanical, electrical engineers

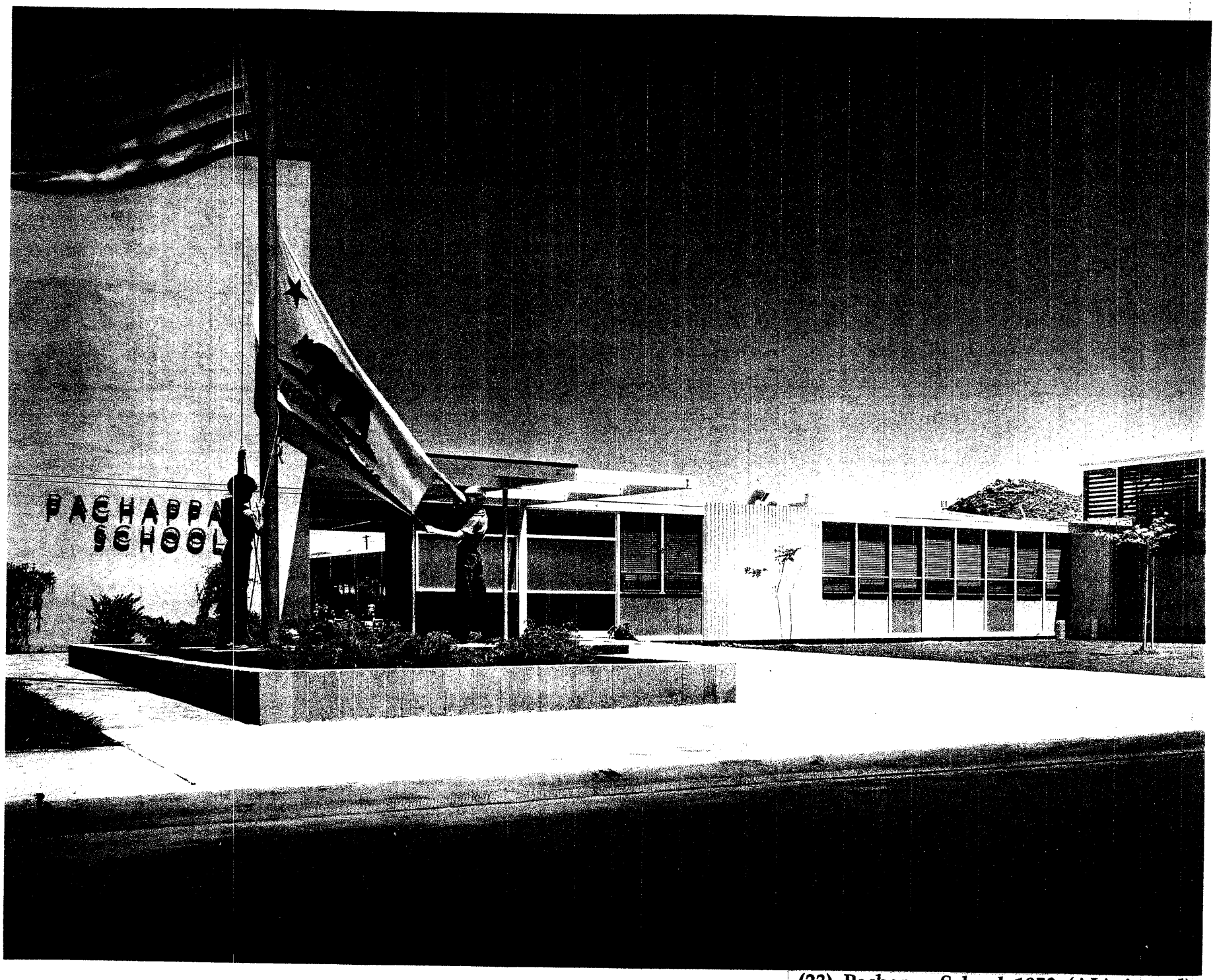
Points worthy of note in the trim, low-cost building ($11.50 per sq. ft; total, $292,680): ▸ exterior metal louvers on both north and south glazing in classrooms to stave off sky glare as well as sun; ▸ both side walls of classrooms 100% glazed, horizontally stiffened with exposed X-rod bracing; ▸ frame and stucco construction throughout; ▸ classroom partitions of plywood plastered on one side against sound transmission, left naked as own finish on other side (and serving also as the only shear bracing in the building—there is no diagonal sheathing).

Bright colored and cheery, this 12-classroom school accepts the bright sun and California's kids with unostentatious, but real, architectural charm.

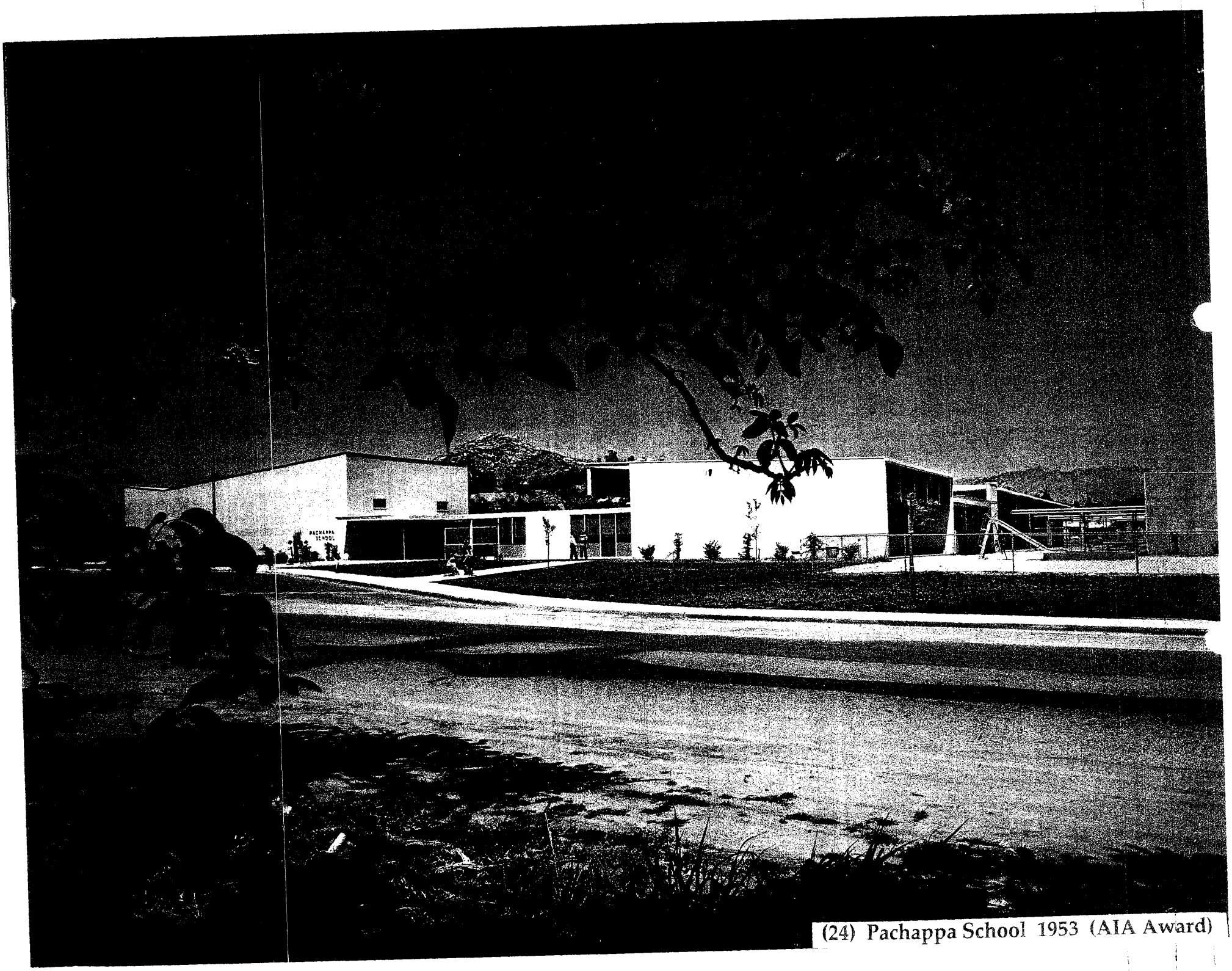


Covered crosswalks connect two main wings of school, save hallways





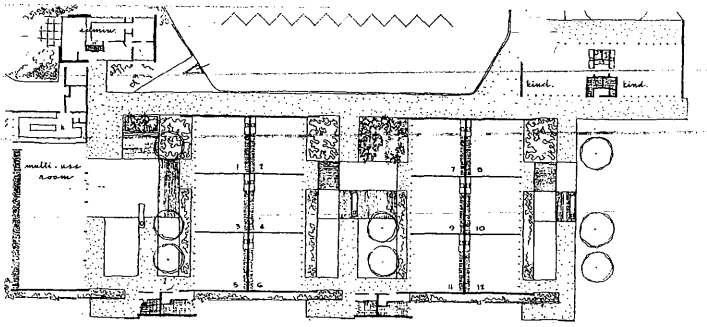
(23) Pachappa School 1953 (AIA Award)



(24) Pachappa School 1953 (AIA Award)



(25) Victoria School 1955



Back-to-back classrooms enlarged by courts

Victoria Elementary School
Riverside, California

CAUGHEY & TERNSTROM
Architects

WILLIAM PORUSH
Structural Engineer

HILBURG & TURPIN
Mechanical-Electrical Engineers

T. C. PRICHARD & SON
General Contractors

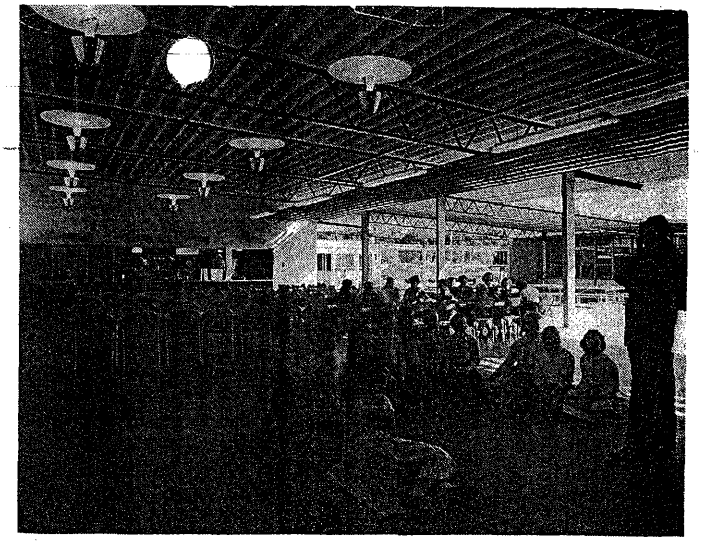
Marvin Rand photos

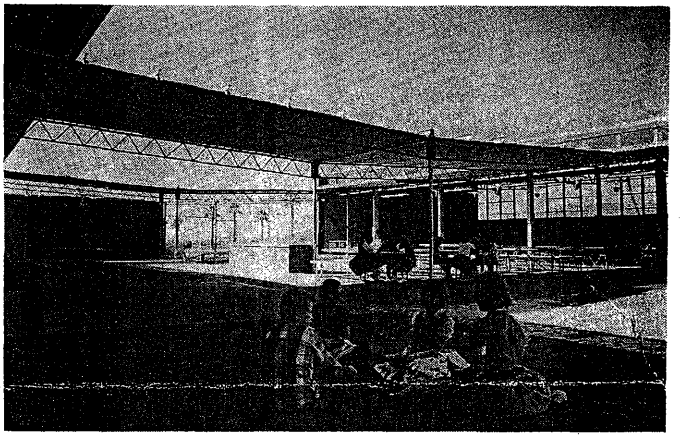


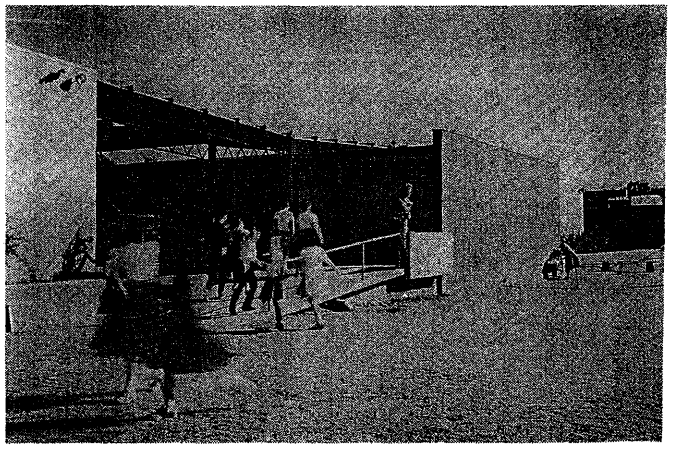
THIS ELEMENTARY SCHOOL, whose present enrollment is 360, appears to be quite unpretentious but it has an unusually workable plan of back-to-back classrooms enlarged by courts. The gently sloping site, rather small in view of future expansion, requires the use of ramps and two separate levels. Buildings are fitted tightly on the upper side to provide maximum playground space, with an odd shaped corner reserved for kindergarteners.

The back-to-back classroom solution offers 1) better site utilization; 2) economies in construction; and 3) pleasant, really usable courts designed for interclass activity or open air eating and spacious enough to minimize distractions. A central utility core facilitates removal of walls when desired; movable cabinets and chalkboards aid teaching flexibility. Sink and storage counters in the courts expedite outdoor instruction, eliminating the need for an installation at each classroom. Fluorescent fixtures supplement daylight and cross ventilation is afforded by a continuous roof unit.

The open, no-glazed side of the multipurpose room creates additional space and the same personnel can supervise both hot and sack lunchers. The area is large enough to accommodate such events as the PTA carnival. Radiant heat allows all-year round use; fenestration and fencing control the wind. Glare and reflection in all courts are reduced by lawn, brick and colored concrete areas as well as overhead louvers and roofs.







OVERHEAD LOUVERS put shadow on otherwise hot ground plant, easing eye strain, creating livability. Center walkway eliminates passing by classroom window wall, acts as glare control; crossover walkways reduce circulation. Ramps connect two levels of gently sloping site.

OUTLINE SPECIFICATIONS

Structure: foundation: reinforced concrete; frame: open-web steel beams; floors: concrete slab.

Exterior Finish: stucco—California Stucco Co.; brick—(Grout-Loc) Davidson Brick Co.

Roof Surfacing: composition and gravel—Pioneer Division-Flintkote.

Windows: steel sash—(Truscon) Republic Steel Corp.

Doors: steel—(Kalamein) Overly Manufacturing Co.

Floor Surfacing: asphalt tile in classrooms—(Matico) Mastic Tile Corporation of America; vinyl tile in kitchen—(Vinylflex) Hachmeister, Inc.

Partitions: stud and plaster.

Interior Finish: plywood finished shear panels; ceramic tile in toilets—Gladding, McBean & Co.

Ceilings: acoustical tile—Pioneer Division-Flintkote.

Lighting Fixtures: fluorescent; others—Wagner-Woodruff Co.

Heating: gas fired wall heaters—Payne Furnace Co.; electric heaters for smaller rooms—Thermador Electrical Mfg. Co.; gas fired boilers in multipurpose and kindergarten—Bryan Electrical Manufacturing Co.; radiant in administration—Trane Co.; radiant controls—Minneapolis-Honeywell Regulator Co.; exhaust fans—Ilg Electric Ventilating Co.

Plumbing and Sanitary: toilets and lavatories—Crane Co.; drinking fountains—Haws Drinking Faucet Co.

Special Equipment: aluminum louvers—Aetna Steel Products Corp.; porcelain enamel letters—California Metal Enameling Co.; linoleum countertops—Armstrong Cork Co.; laminated plastic tabletops—Formica Co.; folding tables—Son-Nel Products, Inc.; rolling counter doors—Cookson Co.; sinks and drainboards—job-built stainless steel; dishwashing machine—Hobart Manufacturing Co.; garbage disposer—Waste King Corp.; lockers—Worley & Co.; corkboard—Armstrong Cork Co.; chalkboard—(Fibraslate) Son-Nel Products, Inc.

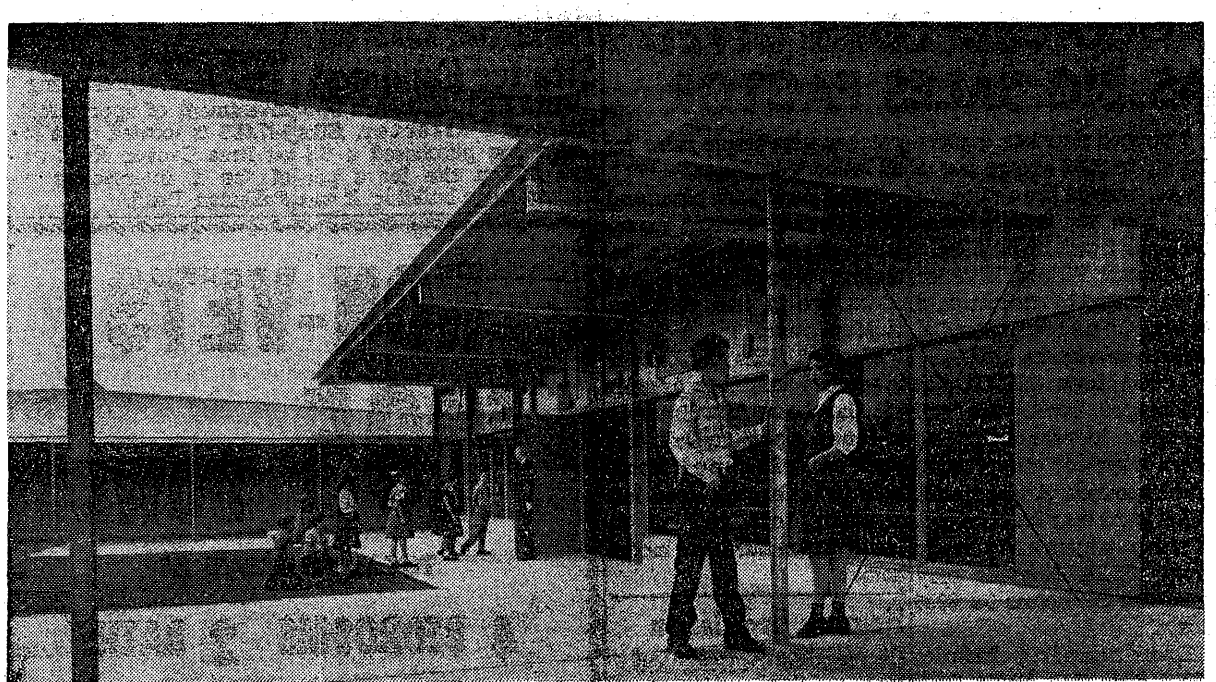
Total Area: 24,425 sq. ft.

Total Cost: $339,483 (entire contract).

Cost per Square Foot: $13.47.

Date of Completion: November 1956.

LA. Times Mar 25 '56



SCHOOL COMPLETED—Entrance court of Monroe Elementary School in Riverside is shown above. The school is one of three which were recently completed for Riverside City School District. Other two are the Victoria and Jefferson Elementary Schools. Architects for this project were Caughey & Ternstrom.

Three Riverside Schools' Dedication Conducted

By a Times Correspondent

RIVERSIDE, March 24 — School and civic officials of Riverside and Dr. Roy E. Simpson, State Superintendent of Public Instruction, dedicated three new elementary schools here recently.

"This is the first time," Dr. Simpson said, "that I have helped to dedicate three new schools in the same school system on the same day."

The new plants are the Victoria, Monroe and Jefferson Schools. While the Victoria and Monroe Schools have been open only a few weeks, school trustees have already taken bids for six-classroom additions at each school. Eighteen new classrooms, a multipurpose room and other facilities have been added at the Jefferson School.

Dr. Simpson said he was much impressed by innovations at the Victoria and Monroe Schools designed by Los Angeles Architects Milton Caughey and Clinton Ternstrom.

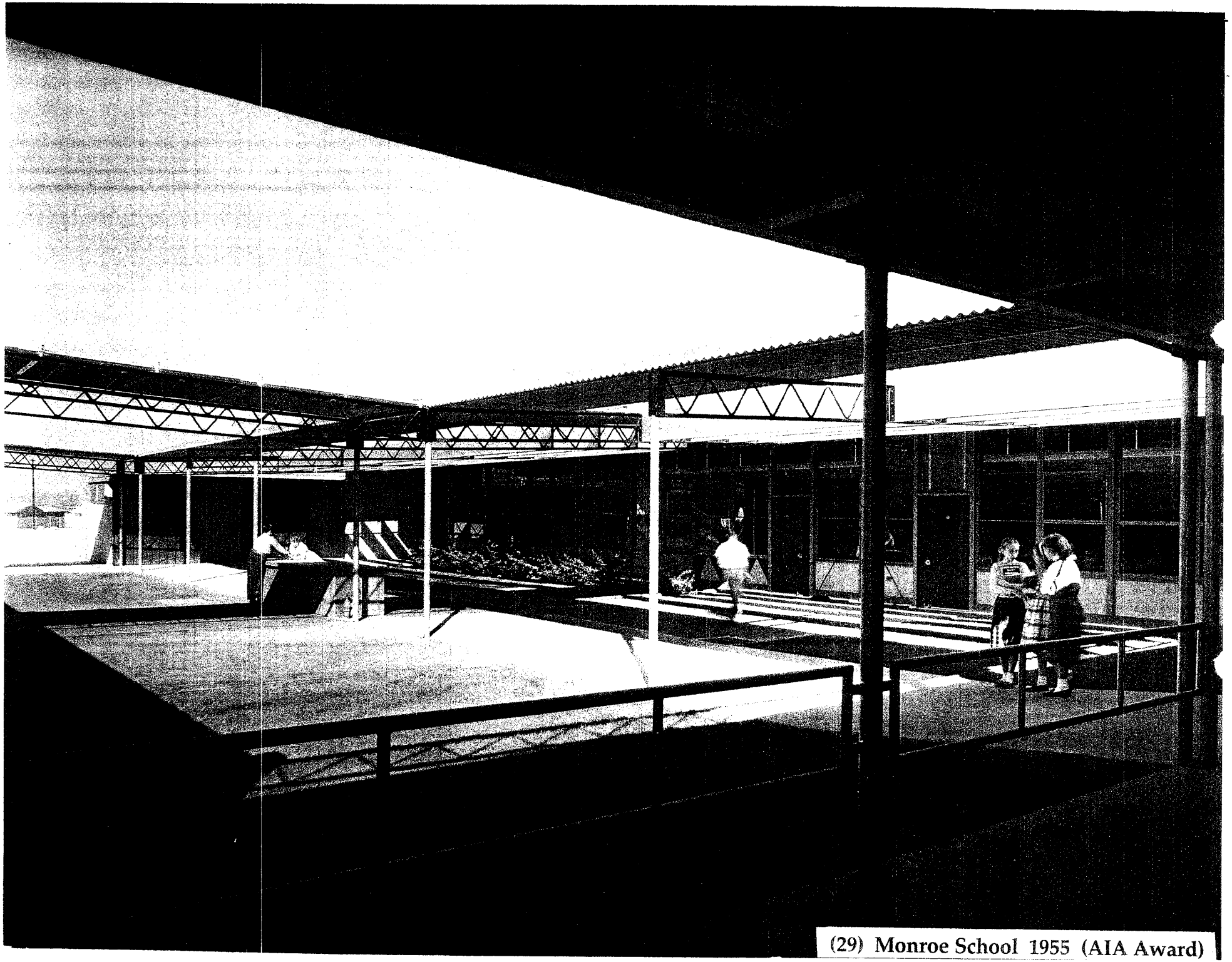
At Victoria School, the multipurpose room has an open side facing a small inner court, around which classrooms are grouped. Radiant and overhead heating has proved ample, it was disclosed.

Back-to-back placement of classroom wings at the Victoria and Monroe Schools has also served to reduce costs through single-wall construction, it was explained.

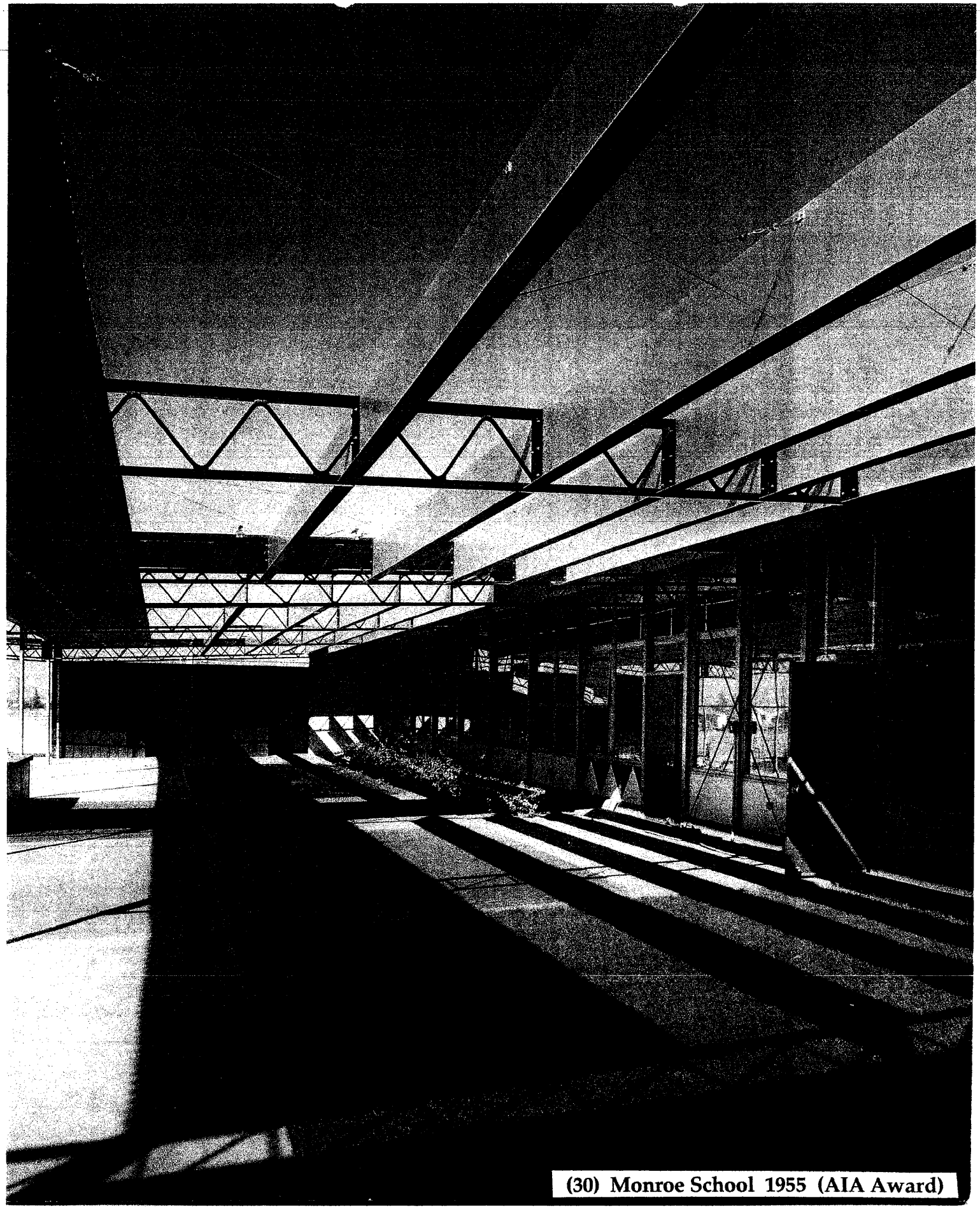
Horizontal placement of louvres has retained control of light with the advantage of creating additional shaded footage outside the buildings.

Bank Issued Permit for Fullerton Branch

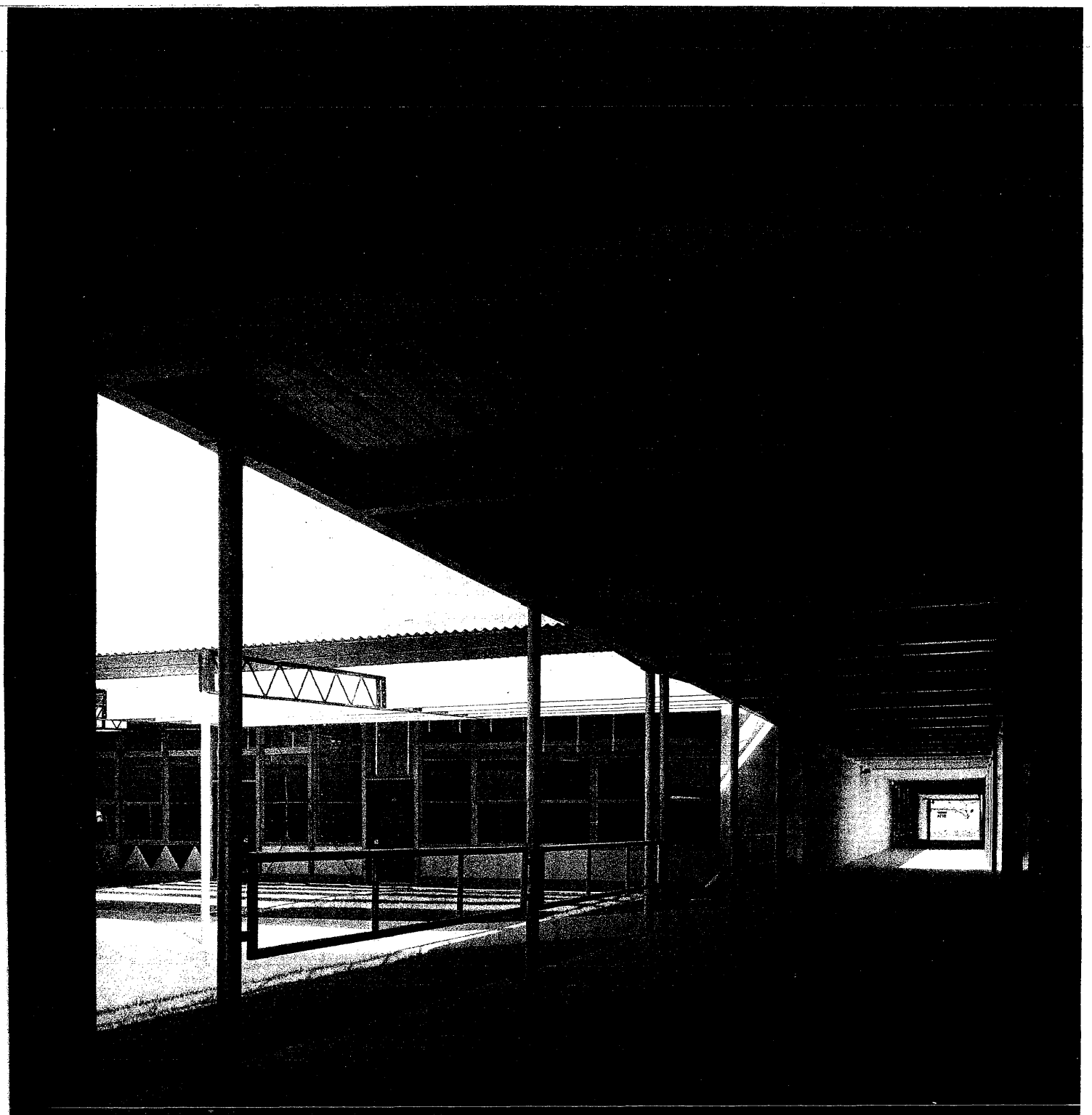
(28) Monroe School 1955 (AIA Award)



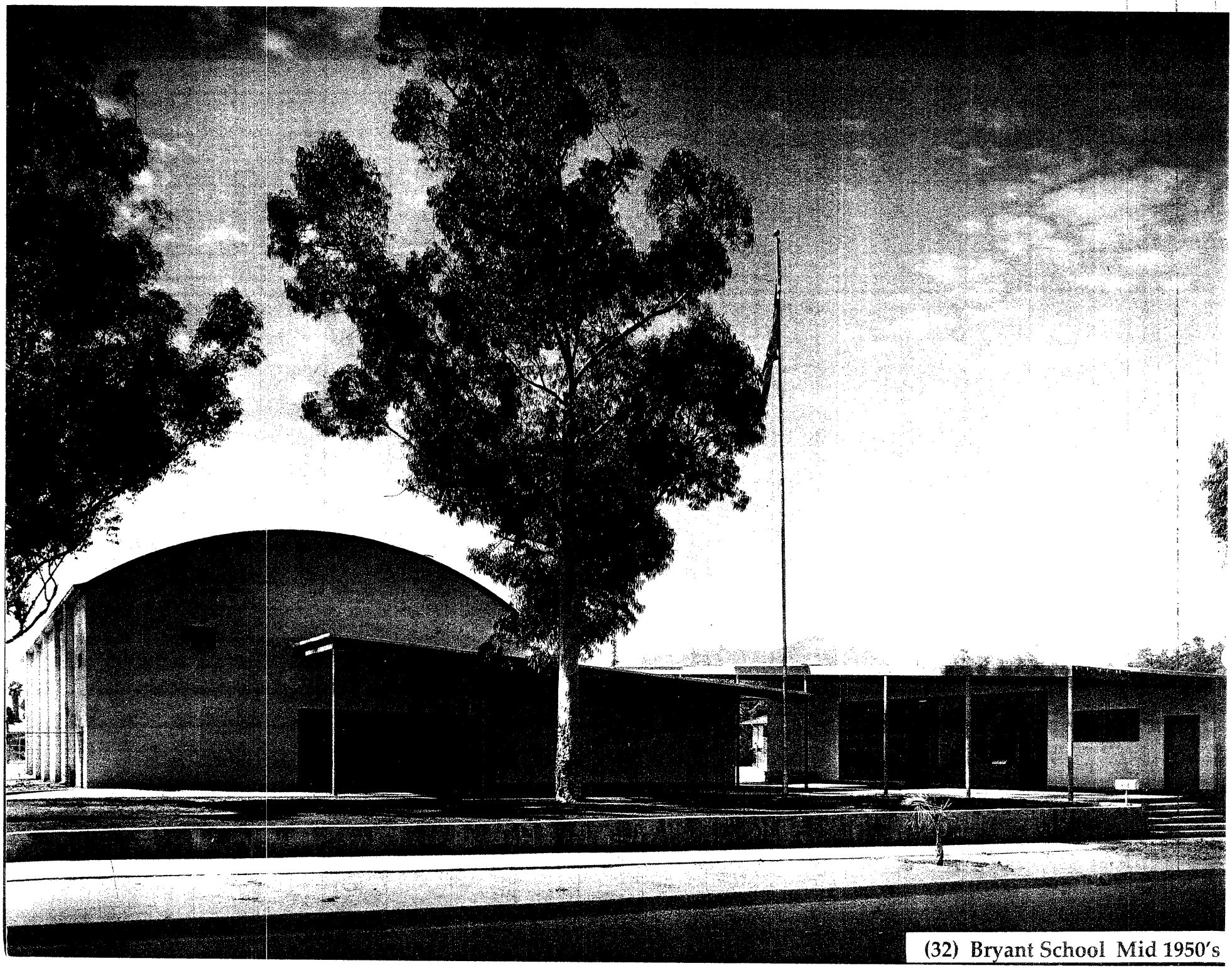
(29) Monroe School 1955 (AIA Award)



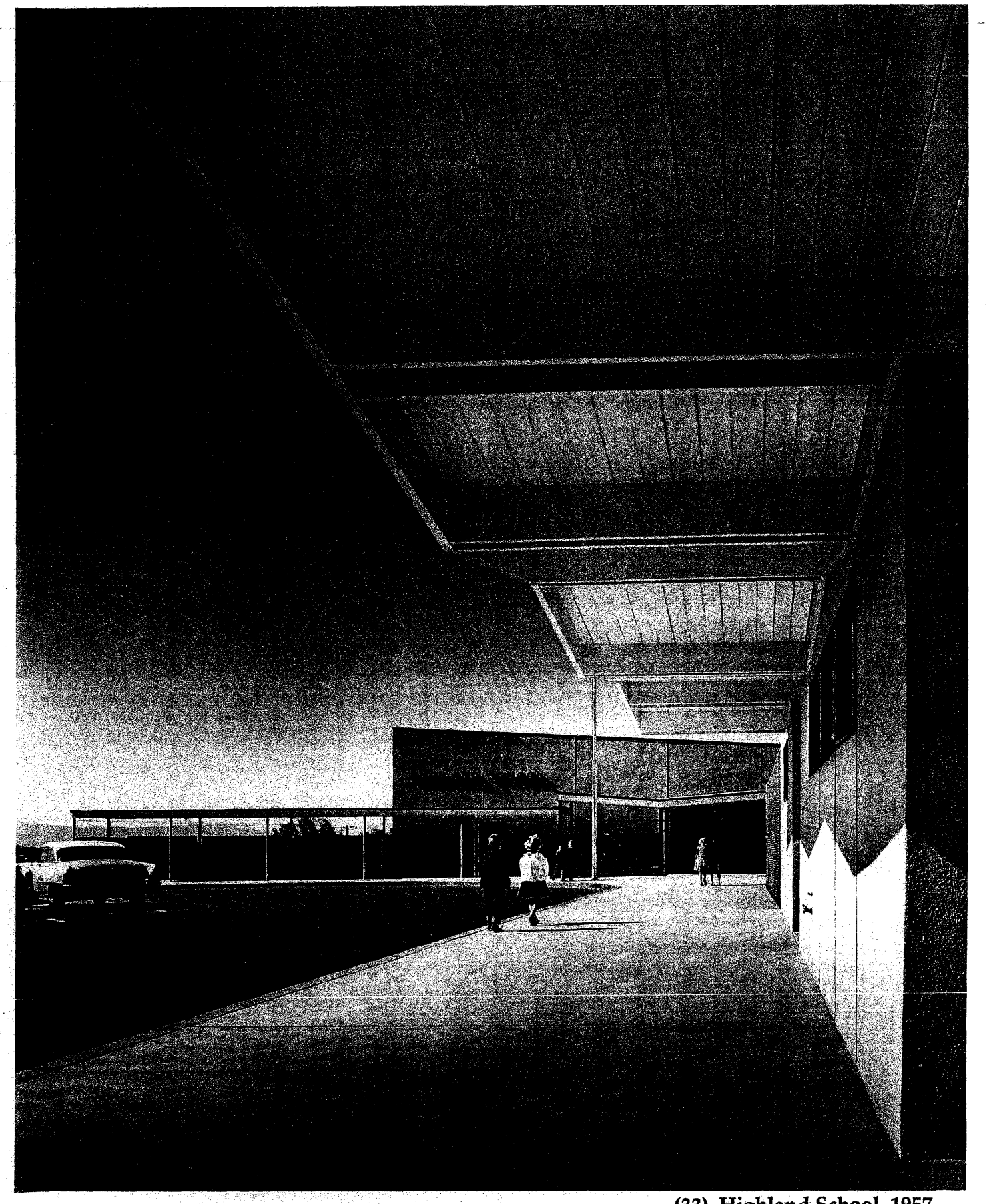
(30) Monroe School 1955 (AIA Award)



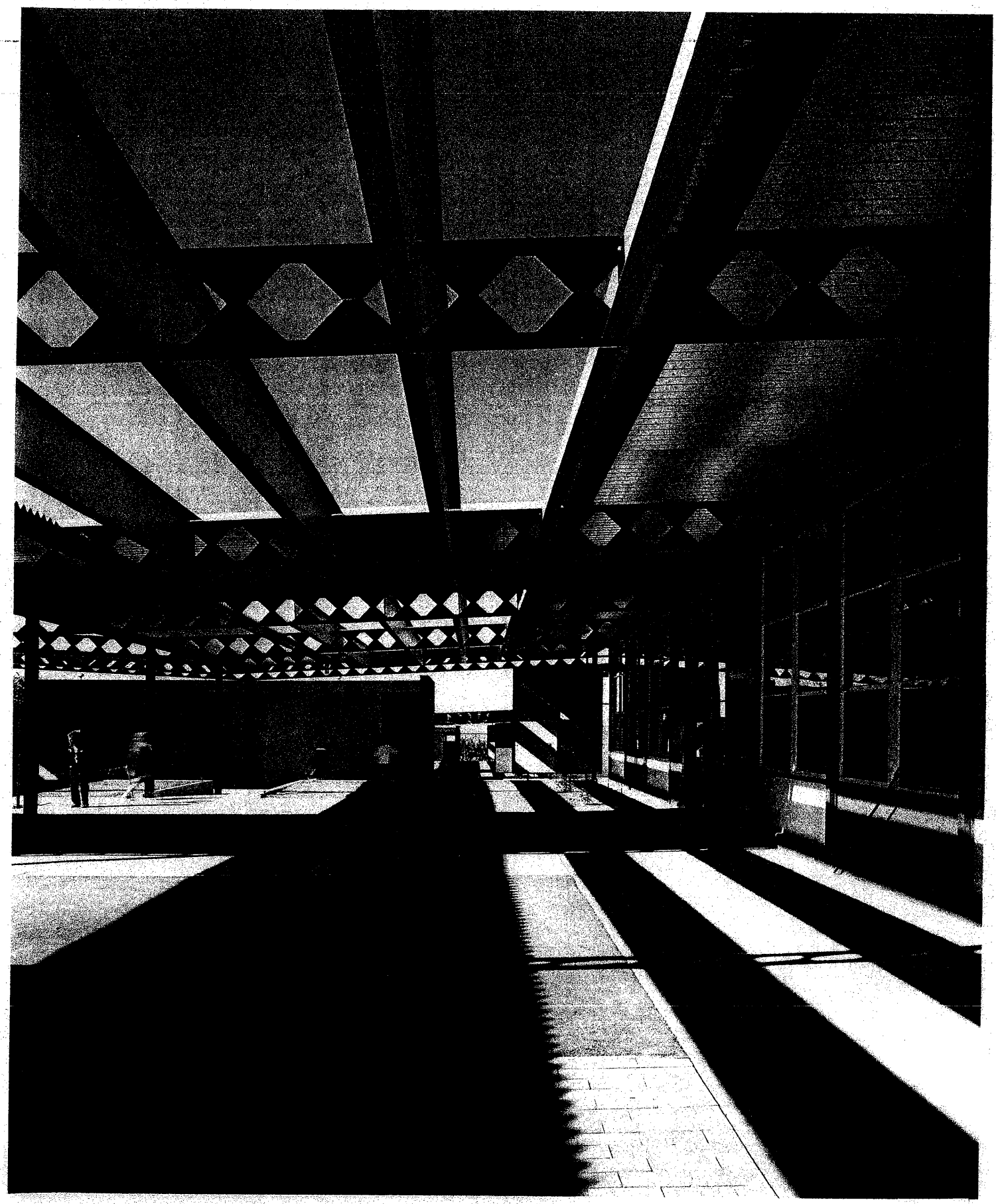
(31) Monroe School 1955 (AIA Award)



(32) Bryant School Mid 1950's



(33) Highland School 1957



(34) Highland School 1957



HENRY L. WRIGHT | HERMAN O. RUHNAU | MILTON H. CAUGHEY | BOLTON C. MOISE JR.

Board Names Senior High Architects

By ROBERT L. PATTON

Employment of four architects, one for a consultant capacity, to prepare plans for Riverside's second senior high school was authorized yesterday by the Board of Education.

Consultant will be Henry L. Wright of Los Angeles. Others are Herman O. Ruhnau and Bolton C. Moise Jr. of Riverside and Milton H. Caughey of Los Angeles.

Ruhnau, Moise and Caughey have been architects for numerous Riverside City school projects during recent years. Wright is a member of the firm of Kistner, Wright and Wright, nationally known for the projection of school planning.

For three years Wright has been a member of the American Institute of Architects National Committee on School Buildings and for five years chairman of the California Council of Architects School Advisory Committee.

No Added Cost

Superintendent Bruce Miller made clear that the addition of a consultant to the architectural staff for the major high school project will entail no additional expense.

While work details are not as yet complete, the architects have already held a preliminary conference and have agreed that fees will not exceed the 3 per cent of construction cost normally allowed.

In a summary of Board and administrative procedure followed in selecting architects the superintendent said that the qualifications of those selected had been thoroughly studied.

"We sought the best architectural aid obtainable," Miller said, "with a consultant in mind who might bring in wide experience on the secondary school level plus extensive research facilities of a large office.

Will Speed Work

"We believe that this plan will undoubtedly expedite the work — speed up the building program. Those of us who have the responsibility for planning details have met numerous times. We have envisioned the finest type of high school commensurate to our pocketbooks."

Recently completed condemnation action has secured a 40-acre school site at Magnolia Avenue and Jefferson Street. With selection of architects and authorization yesterday of a topographical survey the high school project has moved into a planning stage which will lead shortly to announcement of a school bonds vote to finance construction.

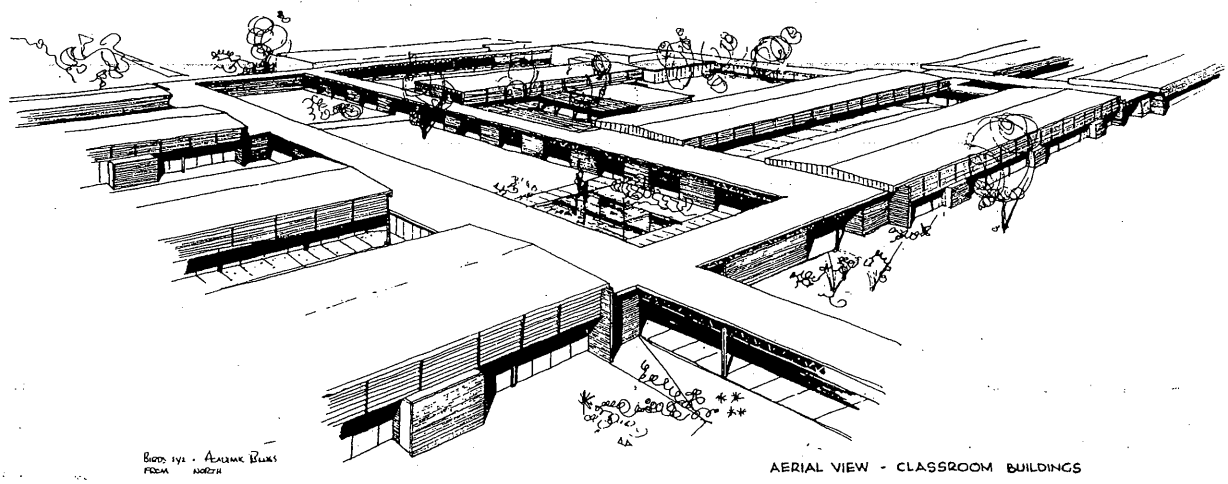
The Board has not as yet ventured an estimate of total cost for the school expected to house from 1500 to 1800 at the outset.

Details Needed

"We cannot go to the people and ask them for a blank check," Miller said. "Voters must be supplied with concrete details which will result from the preliminary plans.

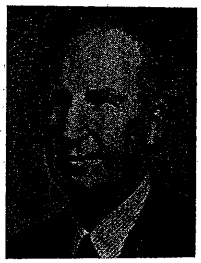
(Turn to SCHOOL, Page 18)

(35) Ramona High School 1956



Aerial view of the classroom buildings for the new high school at Riverside, California. The school has three project architectural firms. These buildings were designed by Caughey & Ternstrom.

RIVERSIDE, CALIFORNIA, PLANS A NEW HIGH SCHOOL



by BRUCE MILLER

Superintendent of Schools, Riverside, California

Superintendent Miller began his career as the principal of a small elementary school in the Imperial Valley. Later he became the principal at Ramona and Placentia; and was appointed the superintendent of schools at Ontario, California, in 1940. He has been with the Riverside City Schools since 1951.

VOTING school bonds or boosting tax limitations to finance new schools or additions is a long, low-gear pull, but if the superintendent and his staff can still smile after the last vote is counted, the shift into high should be made with dispatch. Once having decided in favor of school expansion, the public is eager for action. They want their new schools right away, and if the dirt isn't flying within a few weeks, they threaten to "look into the matter."

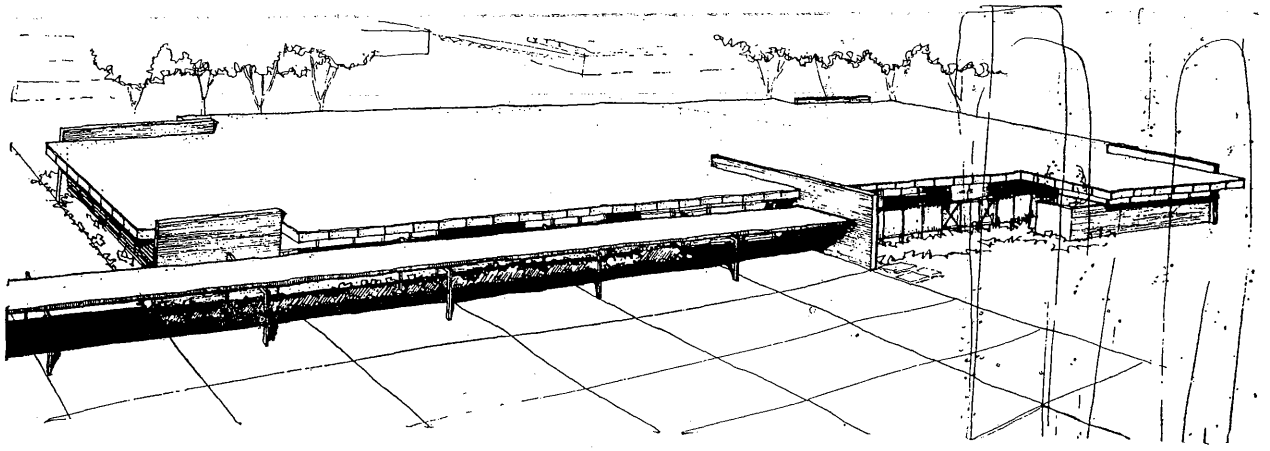
If things have been moving along as they should be, teacher-administrative planning committees have settled their differences and have come to an agreement about improvements for the old plant. Costs have been figured and re-figured with desperate courage.

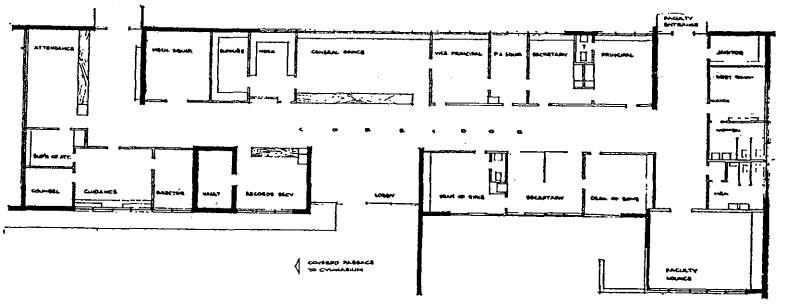
Most important, the architect or architectural staff will be ready to go; better, they will have been on the job for some time. When money is finally available, there should be no long wait for site utilization planning before preliminary drawings can be authorized, leading to the actual working drawings.

Happy is the superintendent who can crawl out from beneath a bundle of blueprints long enough to wave cheerfully at contemporaries and to prove to more caustic critics that the big job is moving "according to schedule."

In Riverside, California, where school enrollments have grown more than 50 percent in four years—from 10,500 to 15,800—and where there is no letup in sight, timing is a vital factor. In late April, 1954, the High School District voted $3,000,000 in bonds for construction of a long-needed second senior high school. The vote was counted on a Tuesday night and on Wednesday morning four architects, already appointed, already in full agreement as to their respective assignments and already well advanced in site planning, really went to work.

While "division" of a major school job is not unusual, several factors are noteworthy with regard to the Riverside plan of procedure. First of all, there was no question in the minds of trustees concerning the quality





The administration building has been designed by Herman O. Ruhnau, architect. The areas included are an attendance office, guidance office, deans' and principal's offices, a general area, rest rooms and a faculty lounge.

superintendent who worked with the architects. This approach has the disadvantage of being a little slower in preliminary phases than other methods, but the advantages outweighed a mild early lag and brought to bear the combined talents and study of many.

The Projects Are Assigned

Architect Herman O. Ruhnau of Riverside was assigned the design of gymnasium, shower and locker buildings, shops and administration building, and the coordination of all specifications and contract documents as well as responsibility for supervision of construction of the entire project. In this task he has available as consultants the other project architects in connection with the buildings they have designed individually. These architects are Bolton C. Moise, Jr., of Riverside, in charge of site development, auditorium and cafeteria, and the firm of Caughey and Ternstrom of Los Angeles. The latter are in charge of all academic classrooms and special rooms.

The entire project will be bid in one lump sum contract in order to take advantage of size and to obtain the lowest unit cost. The contractor, however, under the agreement, will be responsible to only one architect.

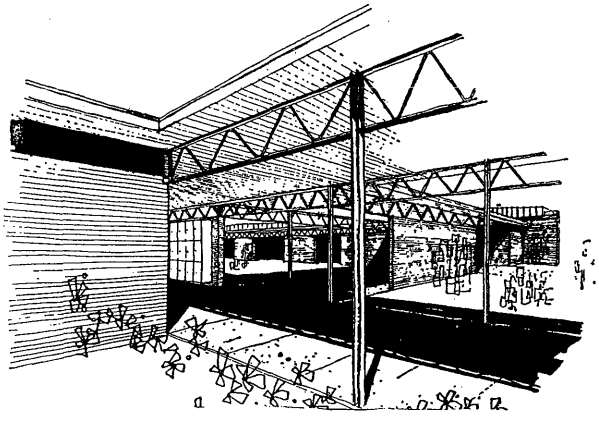
Psychological factors have favored the arrangement from the beginning. The school board has respected the abilities of all architects involved and the architects, in turn, have had confidence in each other. Thus there has developed a true pooling of experience and facilities.

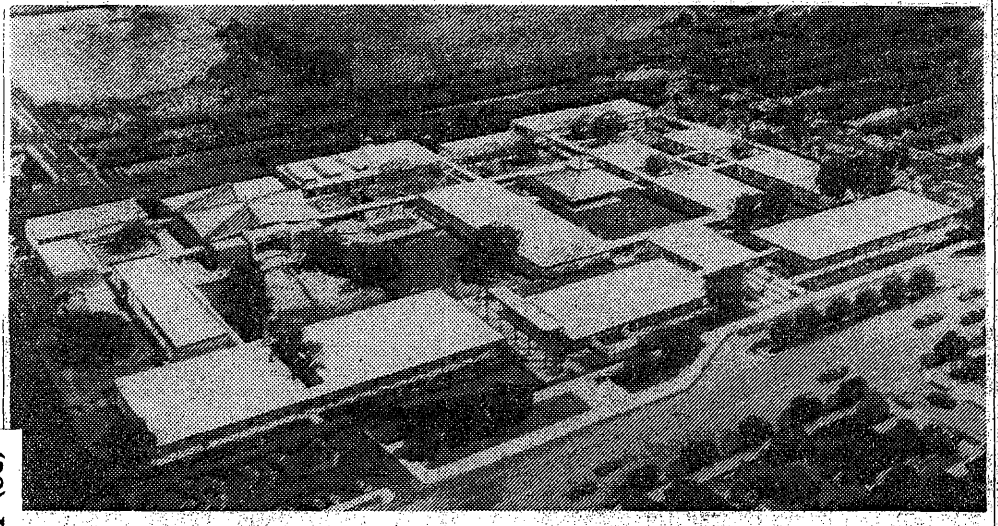
Careful cost controls have been effected. First, there were frequent meetings with trustees and written confirmations of all decisions. During preliminary planning, all matters requiring board decision were brought up for discussion as they arose, so that when the preliminaries were completed they reflected the board's wishes. Complete preliminary plans were approved before the architects proceeded with working drawings, and a detailed estimate was made based upon the preliminary plans. Another estimate will be made upon completion of the working drawings.

Capacity of the School

The high school will house 1,500 students at the outset and will be expanded to a capacity of 2,000 or more later. All of the unexpandable facilities were grouped in the first phase. These included the audi-

The plans for the central court and covered passages are the work of the firm of Caughey and Ternstrom.





BEING BUILT—Shown here is sketch of the $1,750,000, all-steel Rubidoux High School being built in Riverside. School, designed by Caughey & Ternstrom, will accommodate 1000 students and will consist of a total of 15 steel buildings.

$1,750,000 PROJECT

Steel Units Featured at Riverside School

Construction of Rubidoux High School is under way at Riverside, with partial occupancy of the new facility scheduled for early in the 1959 fall semester, according to a joint announcement by Paul Hoefer, president of Hoefer Construction Co., and Kenneth L. Kelley, president of California Steel & Construction Co.

The $1,750,000 project designed by Architects Caughey & Ternstrom, consists of 12 individual structures totaling over 104,135 sq. ft. of floor space including corridors. When finished it will exemplify the latest techniques in the use of steel as a primary construction material.

Prefabricated

The buildings are being prefabricated and will be erected by California Steel & Construction Co. of Los Angeles in co-operation with Hoefer Construction Co. of Fontana, the general contractor.

The school, slated for completion in February, 1960, will accommodate 1,000 students. Plans for future expansion provide for doubling the school's enrollment. The present contract includes construction of a business administration building, a classroom building with 10 academic units and six teaching areas, a gymnasium, a multipurpose structure incorporating an amphitheater for in-door-outdoor assembly, a homemaking and science building with nine teaching areas, a music building, a library, a kitchen and semi-open cafeteria, a shop building and three service buildings.

The business administration building will be faced with porcelain enameled steel panels. Steel will be used for principal structural supports, interior and exterior walls, and frames for doors and sash.

A modular system of construction has been adopted to assure maximum economy wherever standardization is feasible.

Rubidoux High School will serve the entire western section of the Riverside High School District.

(38) Rubidoux High School 1957-58

Much more than steel and wood

By Diane Caughey

PLENTY OF PEOPLE will tell you that Dutton's Brentwood Books is more than a simple bookshop. It's a landmark, they'll say, a literary oasis, a secular church. But it also represents the perfect union of a building and a business.

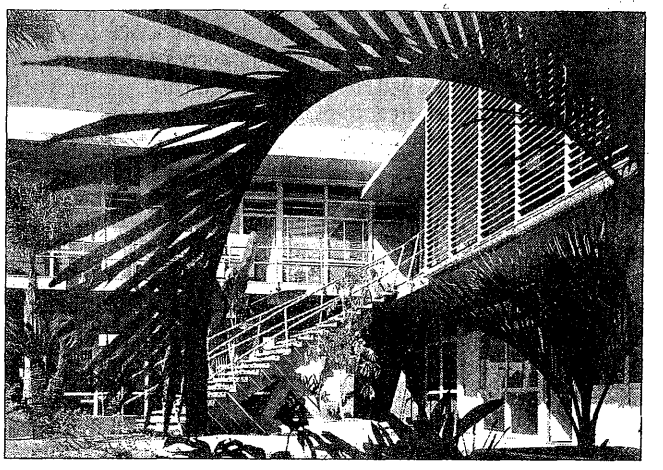
Milton H. Caughey, my father, was the architect who designed that building on San Vicente Boulevard, the one that may be demolished in the near future to make way for a retail-office-condo development. He had a master's degree in architecture from Yale, moved to Los Angeles in 1940 and started his practice after returning from the war. He won a number of awards for the homes and schools he designed, but his budding career was cut short. In 1958, when he was 46, my father died of a heart attack, and the name Milton H. Caughey is little known today.

My family lived in Brentwood — in a house designed by my father — and as a child, I would walk to the simple, two-story courtyard building that Dutton's now occupies. Built in 1950, it's a classic example of midcentury California contemporary architecture. It's solar shades foreshadowed today's green design. The simple facade floats above the sidewalk, held up by small steel columns, typical of the modern movement. The openness created below invites you in off the street to enjoy the intimate heart of the building, the courtyard.

Here, offices with walls of windows surround a space of sunlight, fresh air and nature — a rarity in today's office buildings. The courtyard is a meeting space of interior and exterior, public and private, the perfect gathering spot. My mother, Janet Caughey, now 94, still visits Dutton's weekly.

But authentic landmarks are not built; they grow over time. The first bookstore, Brentwood Book Shop, moved into the building in 1960, and Dutton's bought that business in 1984. Over 22 years, Dutton's expanded into nearly all the other ground-floor spaces, filling them with overflowing bookshelves.

The courtyard became an extension of the store, where authors signed their books and children listened to stories while their parents sipped coffee from the cafe in the corner.



ROBERT C. CLEVELAND

PERFECT MATCH: The building that has housed Dutton's Brentwood Books for 22 years is uniquely suited to the task.

Like a good marriage, building and bookstore have brought out the best in each other. The wonderful experience of browsing Dutton's shelves is bodily linked to the character of the physical space. The emotional descriptions of the store as "funky" or "sacred" reflect our deep longing for spaces where the world can feel intimate again. History, memory and love have been absorbed into the very steel and wood of the walls. That's what brings a building to life.

Unfortunately, most of our new mega-buildings, built for maximum space and profit, are dead. Their souls have crept out through the door, seeped out through the cracks. Is this the fate of this property on San Vicente Boulevard? As a city, are we destined to lose yet another genuine landmark? I hope not. I'm working with the Los Angeles Conservancy and historic preservationists in the city's Planning Department to nominate the building as a historic cultural monument.

If that fails, Charles T. Munger, who owns the building and a large swath of land around it, has said that any new development would include a ground-floor space for Dutton's or another independent bookstore. But without that building, in my mind, Dutton's would always be a widow.

DIANE CAUGHEY *is an architect and Jungian psychotherapist in West Los Angeles.*

List of authors

who've had book signings or readings at Dutton's Brentwood in the Barry Building.

Isabel Allende
Martin Amis
Kate Atkinson
Margaret Atwood
Don Bachardy
Russell Banks
Nick Bantock
Lynda Barry
Graeme Base
Charles Baxter
T.C. Boyle
Kate Braverman
Berkeley Breathed (5/07)
Octavia Butler
Meg Cabot
George Carlin
Rosalyn Carter
Raymond Carver
Michael Chabon
Eoin Colfer
Jackie Collins
Pat Conroy
Robert Crais
Michael Cunningham
Jamie Lee Curtis
Leo & Diane Dillon
Roddy Doyle
Bob Edwards
James Ellroy
Amy Ephron
Louise Erdrich
Percival Everett
Jasper Fforde
Janet Fitch
Anne Taylor Fleming
Jonathan Safran Foer
Dick Francis
Jonathan Franzen
Carlos Fuentes
Cornelia Funke
Al Gore
Jane Hamilton
Carl Hiaasen
Oscar Hijuelos
Alice Hoffman
A.M. Holmes
Nick Hornby
Khaled Hosseini (6/07)

Thomas Hoving
Robert Hughes
Eric Idle
Pico Iyer
P.D. James
Diane Johnson
Roger Kahn
John Kerry (4/07)
Ross King
Barbara Kingsolver
Nicole Krauss
Jhumpa Lahiri
Chang-Rae Lee
Ursula Leguin
Annie Leibovitz
Diane Leslie
Jonathan Lethem
Mario Vargas Llosa
David Lodge
Alison Lurie
David Mamet
Steve Martin
Frank McCourt
Malachy McCourt
Ian McEwan
Larry McMurtry
Anchee Min
Ralph Nader
Howard Norman
Tim O'Brien
Amos Oz
Chuck Palahnick
Robert Parker
Richard Price
Reynolds Price
John Rechy
Ann Rice
Salman Rushdie
Carolyn See
Lisa See
Vikram Seth
Sidney Sheldon
Alan Shephard
Carol Shields
Maria Shriver
Jane Smiley
Lemony Snickett
Sonya Sones
Susan Straight
Amy Tan
Scott Turow
Gore Vidal
William Vollman

Kurt Vonnegut
Alice Walker
David Foster Wallace
Sarah Waters
Marianne Wiggins
Robert Wilson
Tom Wolfe

SANTA MONICA
Mirror
REFLECTING THE CONCERNS OF THE COMMUNITY
FEBRUARY 15 - 21, 2007



SAVE OUR BOOKSTORE



Once a semester, Toni Courtin, a pre-school teacher at the Brentwood Presbyterian Church Nursery School for 21 years, takes her class on a reading hour excursion to Dutton's Books on San Vicente, which sets on property recently sold to an individual interested in developing the real estate. Each child is given $10.00 to buy a book followed by a snack outdoors. *photo by Beverly Cohn*

Sources

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.Archtectural Forum. (Oct, 1954). "Young architects: Ten outstanding buildings by some of the nations most promising young designers."(pg. 148) "School shielded from the sun."

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Sources

Interviews

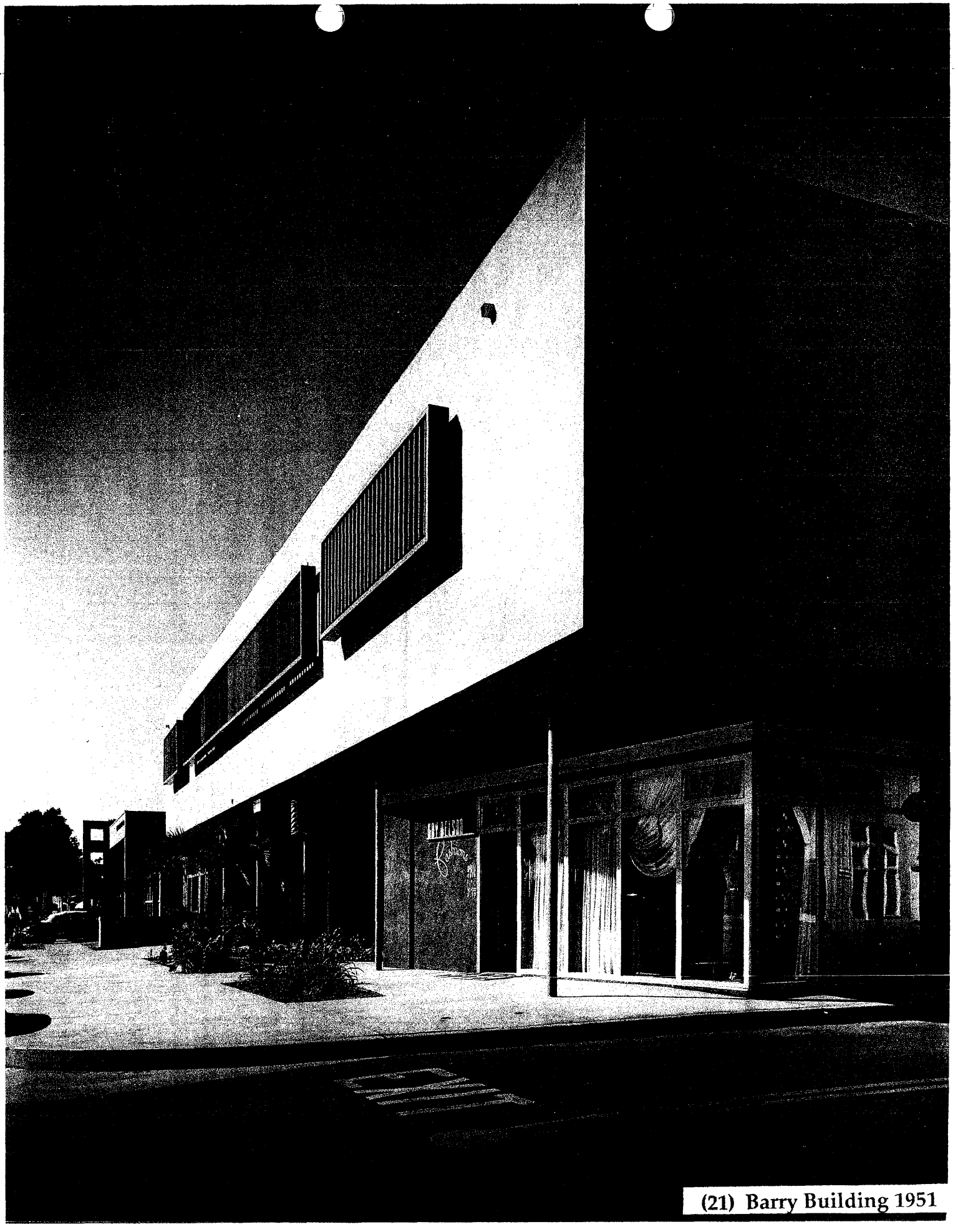
Interview with Clint Ternstrom of the firm Caughey and Ternstrom. (Jan.30, 2007).

Interview with Joanne Wehmueller, office manager for Milton Caughey for 8 years. (Feb. 3, 2007).

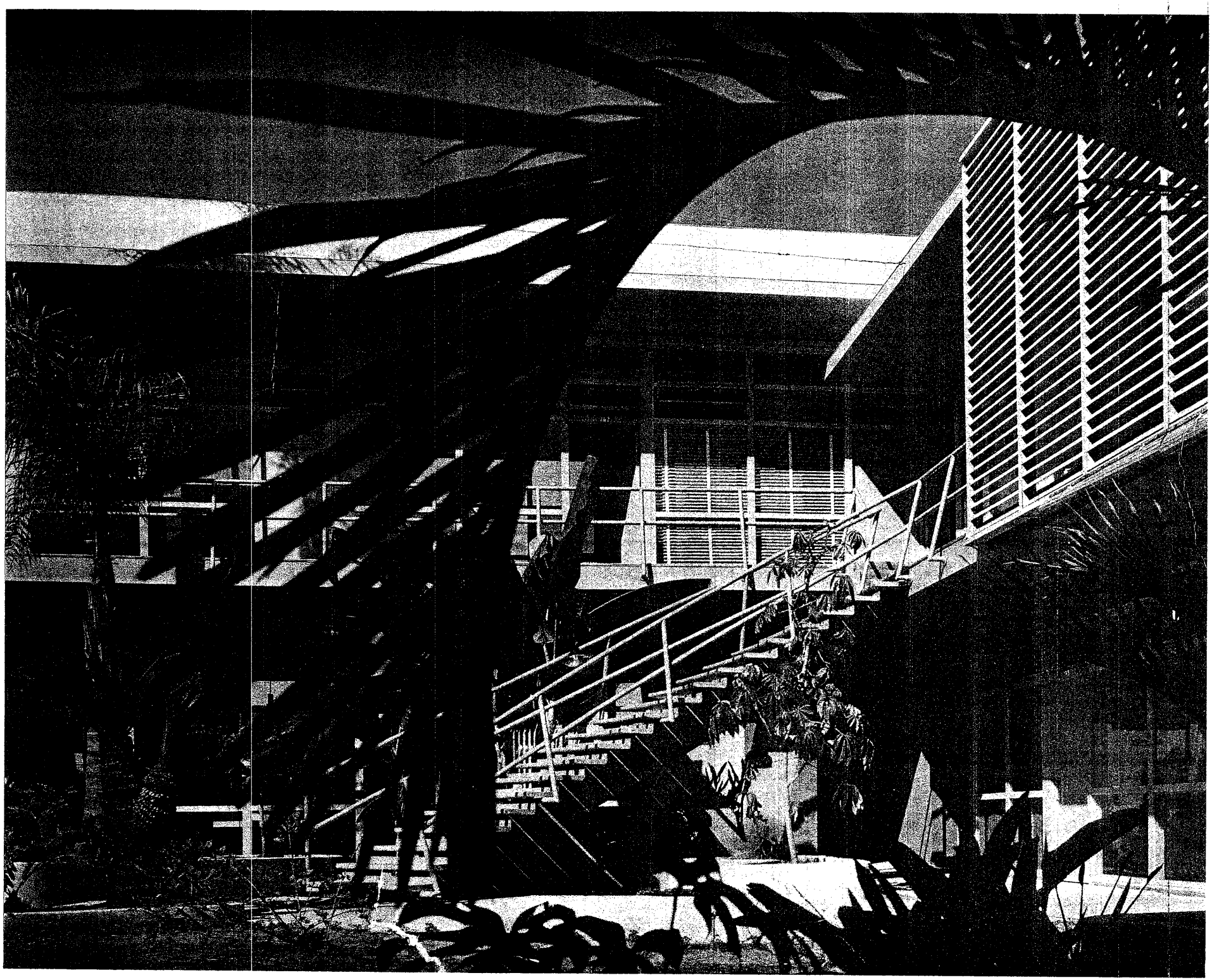
Interview with Ray Kappe, Architect. Shared office building and occasionally drafted for Milton Caughey. (Feb 4, 2007).

Interview with Julius Shulman, Architectural photographer of Milton Caughey's work. (Feb. 20, 2007).

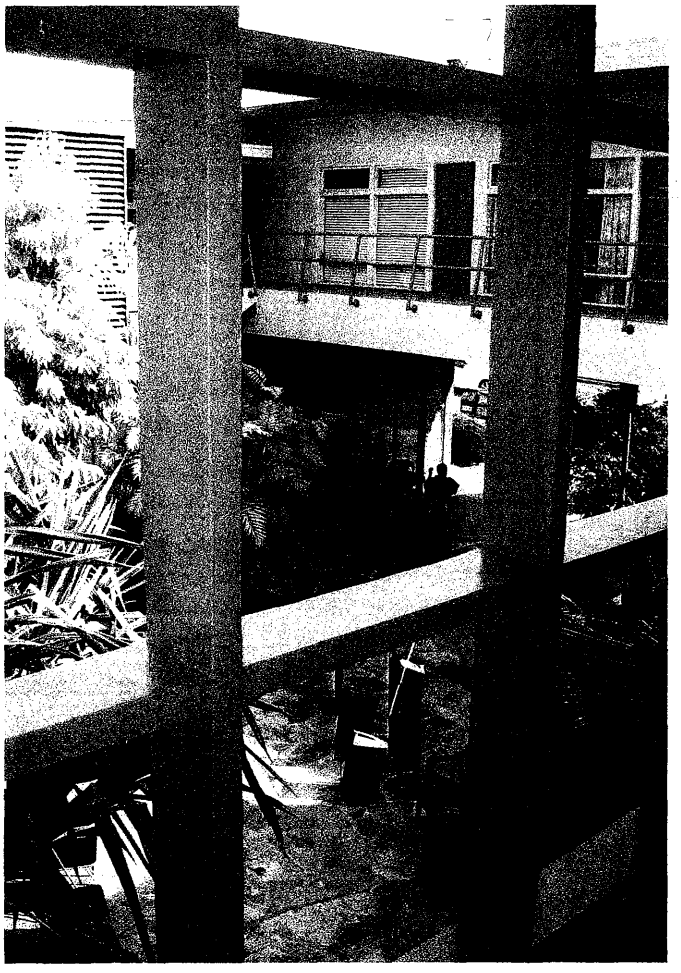

The Barry Building
© 2007 Europa Technologies
Image © 2007 Sanborn
Pointer 34°03'10.26" N 118°28'20.21" W elev 315 ft Streaming 100%

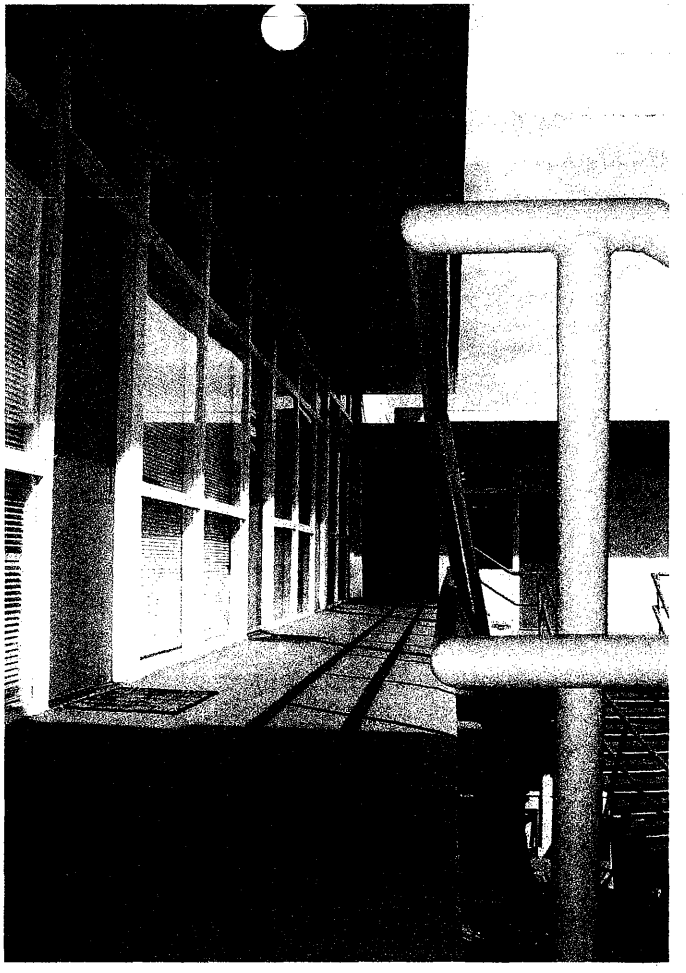


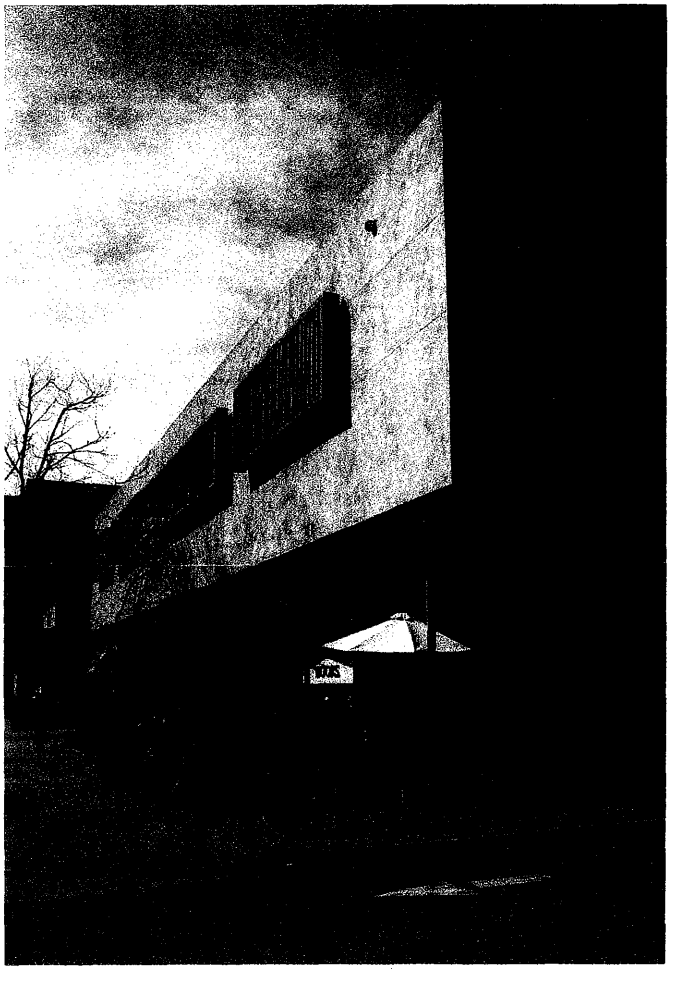
(21) Barry Building 1951

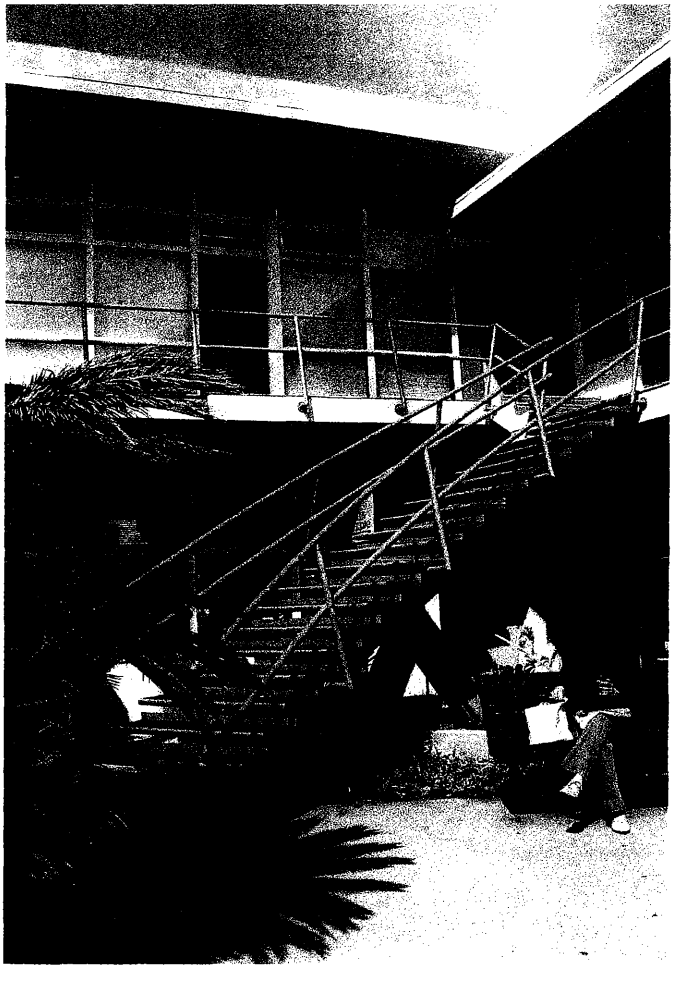


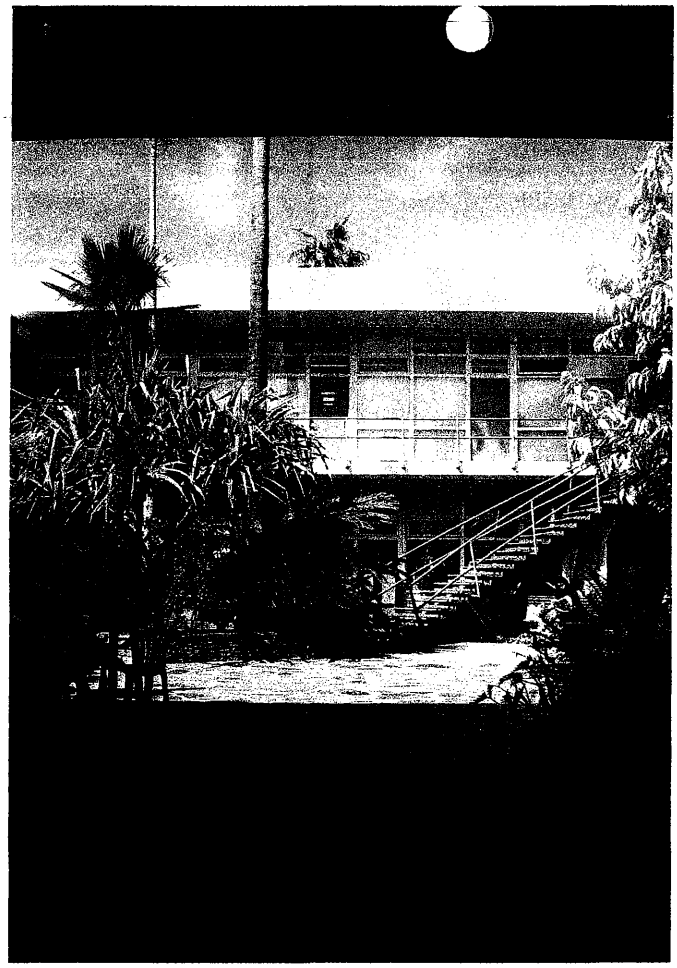
CURRENT PHOTOGRAPHS OF THE BARRY BUILDING

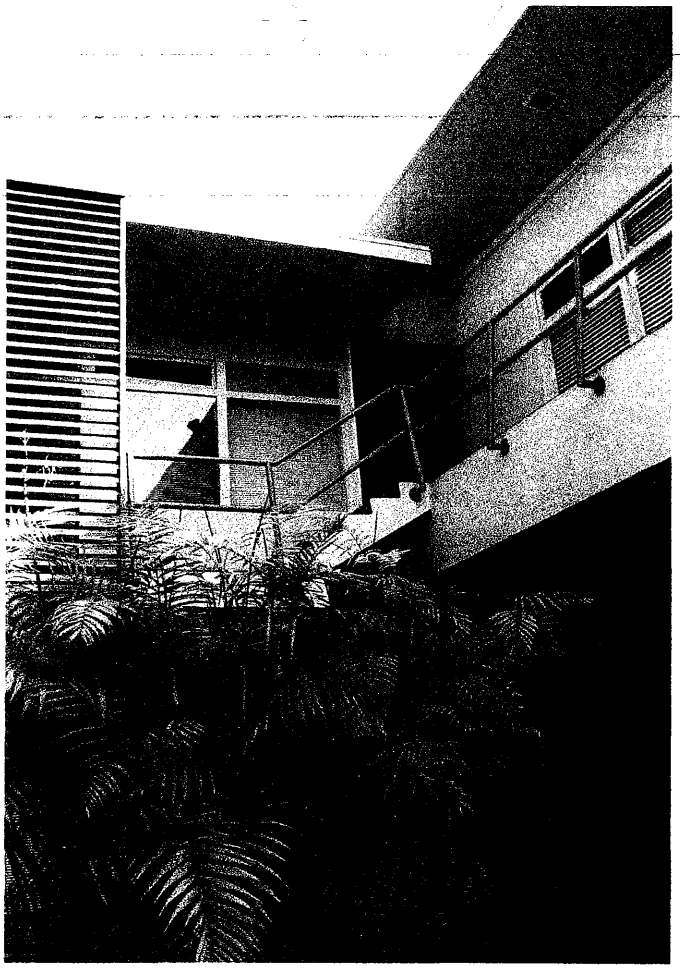


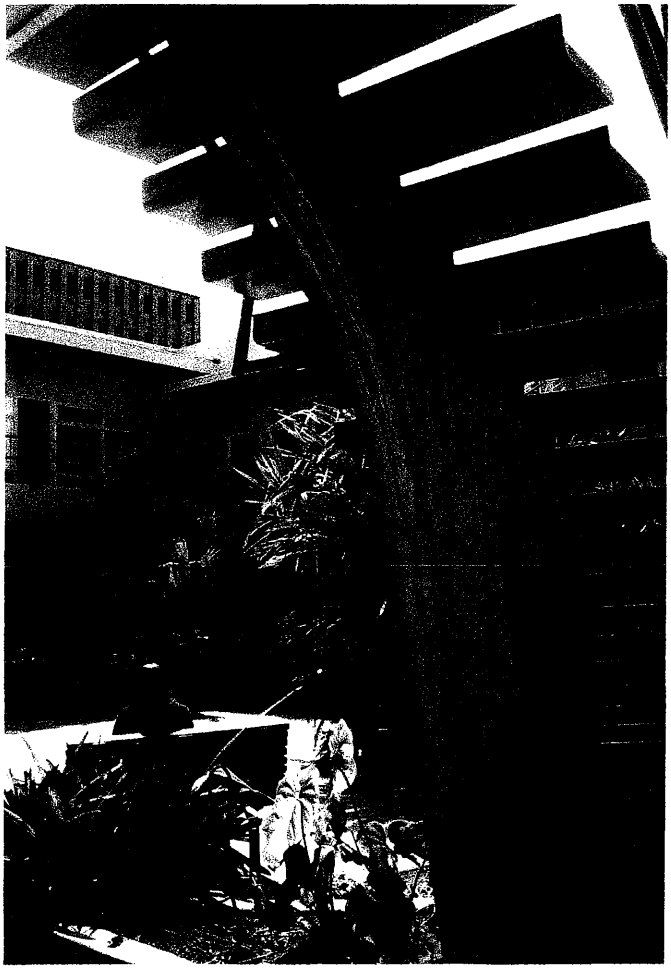






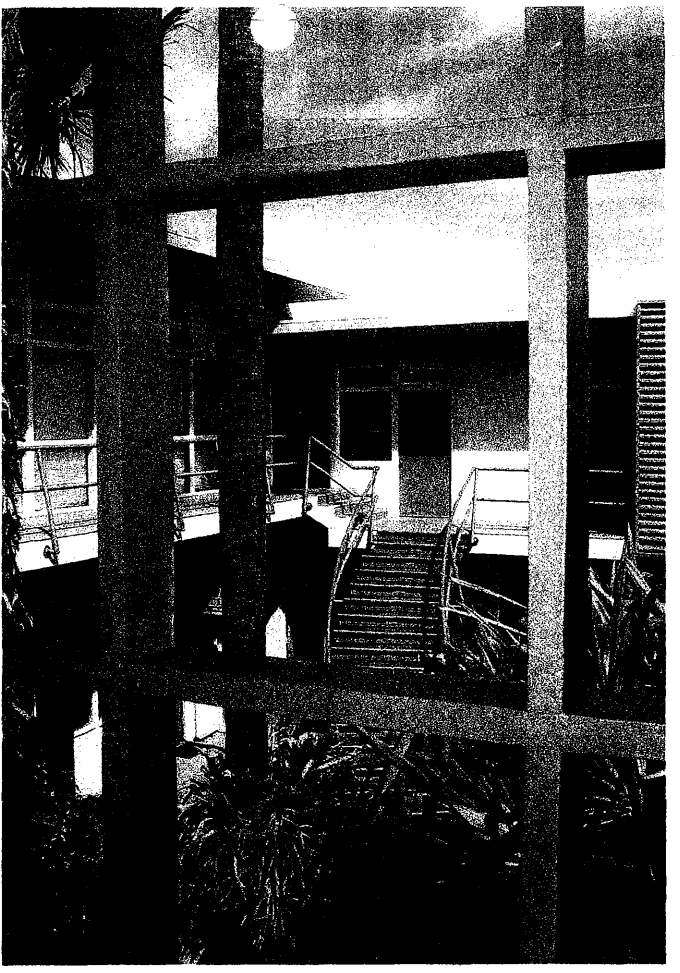


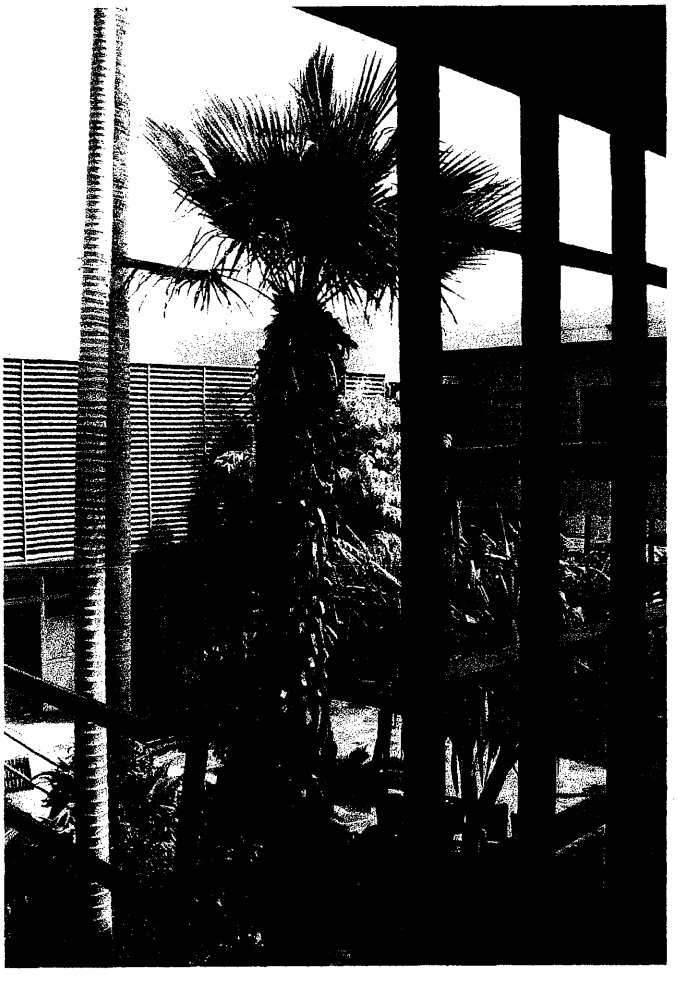


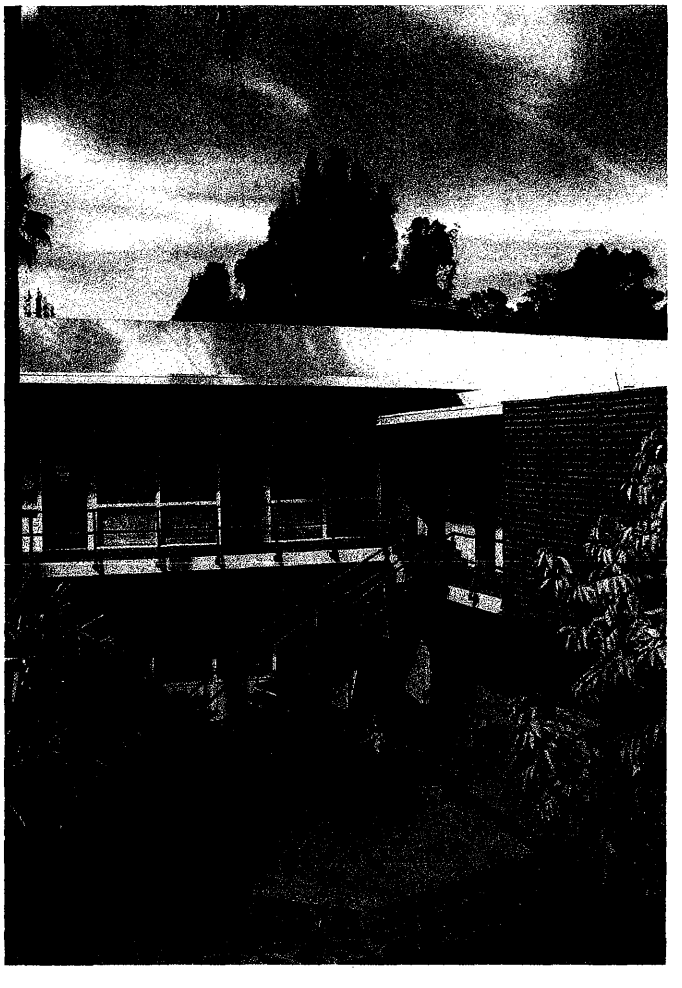




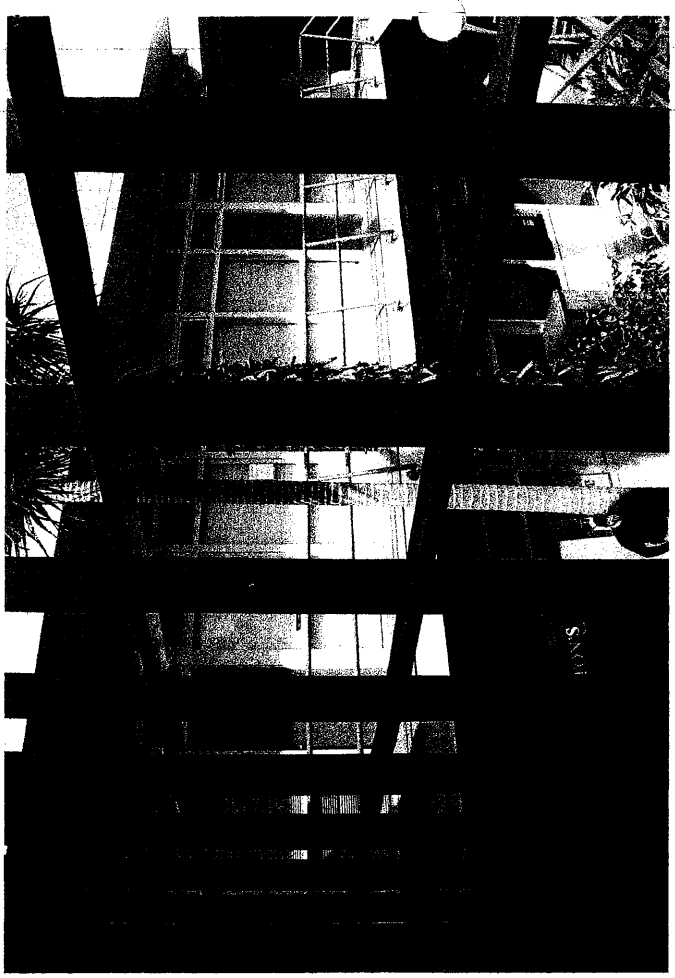






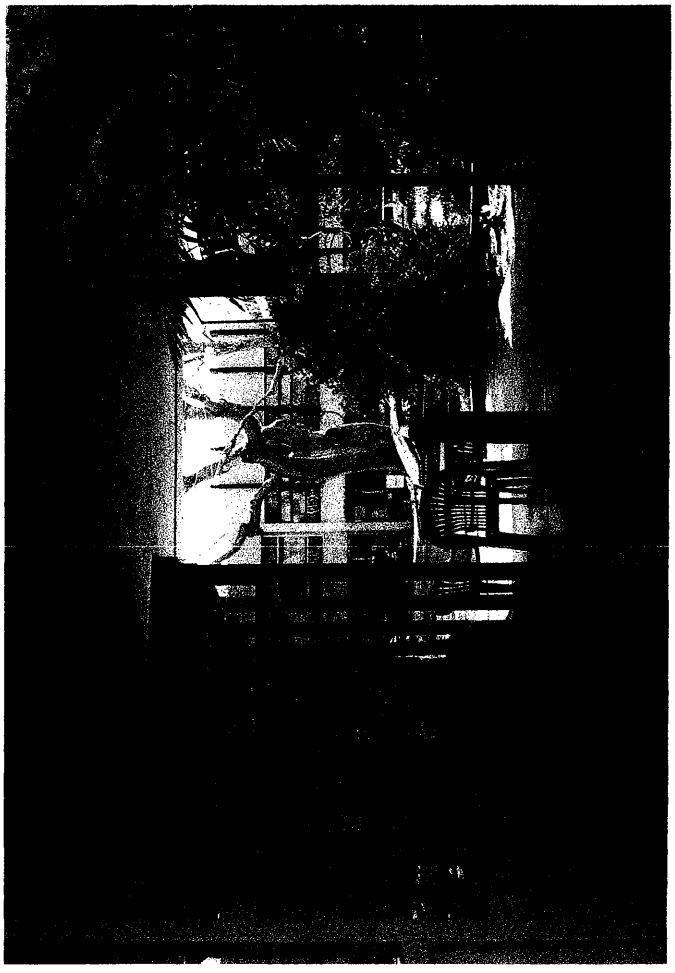


DUTTON'S BRENTWOOD BOOKS









City of Los Angeles
Department of City Planning

04/13/2007

PARCEL PROFILE REPORT

PROPERTY ADDRESSES
11975 W SAN VICENTE BLVD
11973 W SAN VICENTE BLVD

ZIP CODES
90049

RECENT ACTIVITY
None

CASE NUMBERS
CPC-29649
CPC-28385
CPC-25504
CPC-24818-HD
CPC-24817
CPC-1994-308-DRS
CPC-1993-359-DRB
ORD-173381
ORD-157559-SA14A
ORD-146541
ED-74-2641.03-143-ZC
PRIOR-07/29/1962

Address/Legal Information

PIN Number:	129B145 87
Area (Calculated):	16,592.8 (sq ft)
Thomas Brothers Grid:	PAGE 631 - GRID G4
Assessor Parcel Number:	4404025008
Tract:	WESTGATE ACRES
Map Reference:	M B 7-90/91
Block:	None
Lot:	51
Arb (Lot Cut Reference):	1
Map Sheet:	129B141 129B145

Jurisdictional Information

Community Plan Area:	Brentwood - Pacific Palisades
Area Planning Commission:	West Los Angeles
Neighborhood Council:	None
Council District:	CD 11 - Bill Rosendahl
Census Tract #:	2640.00
LADBS District Office:	West Los Angeles

Planning and Zoning Information

Special Notes:	None
Zoning:	C4-1VL
Zoning Information (ZI):	ZI-1802 Hillside Grading Ordinance Exemption Area
General Plan Land Use:	Neighborhood Office Commercial
Plan Footnote - Site Req.:	See Plan Footnotes
Additional Plan Footnotes:	Brentwood
Specific Plan Area:	San Vicente Scenic Corridor West Los Angeles Transportation Improvement and Mitigation
Historic Preservation Review:	No
Historic Preservation Overlay Zone:	None
Other Historic Designations:	None
Mills Act Contract:	None
POD - Pedestrian Oriented Districts:	None
CDO - Community Design Overlay:	None
Streetscape:	No
Sign District:	No
Adaptive Reuse Incentive Area:	None
35% Density Bonus:	Eligible
CRA - Community Redevelopment Agency:	None
Central City Parking:	No
Downtown Parking:	No
Building Line:	None
500 Ft School Zone:	No
500 Ft Park Zone:	No

Assessor Information

Assessor Parcel Number:	4404025008
Parcel Area (Approximate):	26,789.4 (sq ft)
Use Code:	1200 - Store and Office Combination
Building Class:	D65B
Assessed Land Val.:	$955,206
Assessed Improvement Val.:	$62,568
Year Built:	1951 1951
Last Owner Change:	12/14/06

Last Sale Amount:	$0
Number of Units:	32
Number of Bedrooms:	0
Number of Bathrooms:	2
Building Square Footage:	13,301.0 (sq ft)
Tax Rate Area:	67
Deed Reference No.:	None

Additional Information

Airport Hazard:	None
Coastal Zone:	None
Farmland:	Area not Mapped
Very High Fire Hazard Severity Zone:	No
Fire District No. 1:	No
Fire District No. 2:	Yes
Flood Zone:	None
Hazardous Waste / Border Zone Properties:	No
Methane Hazard Site:	None
High Wind Velocity Areas:	No
Hillside Grading:	Yes
Oil Wells:	None
Alquist-Priolo Fault Zone:	No
Distance to Nearest Fault:	Within Fault Zone
Landslide:	No
Liquefaction:	No

Economic Development Areas

Business Improvement District:	None
Federal Empowerment Zone:	None
Renewal Community:	No
Revitalization Zone:	None
State Enterprise Zone:	None
Targeted Neighborhood Initiative:	None

Public Safety

Police Information:	
Bureau:	West
Division / Station:	West Los Angeles
Report District:	826
Fire Information:	
District / Fire Station:	19
Batallion:	9
Division:	1
Red Flag Restricted Parking:	No

CASE SUMMARIES

Note: Information for Case Summaries is Retrieved from the Planning Department's Plan Case Tracking System (PCTS) Database.

Case Number: CPC-24818-HD
Required Action(s): HD-HEIGHT DISTRICT
Project Description(s): Data Not Available

Case Number: CPC-1994-308-DRS
Required Action(s): Data Not Available
Project Description(s): DESIGN REVIEW BOARD REQUEST TO INSTALL A NEW SIGN.

Case Number: CPC-1993-359-DRB
Required Action(s): DRB-DESIGN REVIEW BOARD
Project Description(s): ADD RECIVING - STORAGE AREA TO DUTTON'S BOOKS

Case Number: ED-74-2641.03-143-ZC
Required Action(s): ZC-ZONE CHANGE
Project Description(s): Data Not Available

Case Number: PRIOR-07/29/1962
Required Action(s): ZC-ZONE CHANGE
Project Description(s): Data Not Available

DATA NOT AVAILABLE

CPC-29649
CPC-28385
CPC-25504
CPC-24817
ORD-173381
ORD-157559-SA14A
ORD-146541

EXHIBIT F1

Robert Blue & Sieglinde Kruse Blue
Los Angeles, CA 90049

bob.blue@live.com ziggykruse2005@yahoo.com

July 20, 2025

VIA EMAIL ONLY
Board of Building and Safety Commissioners
Attn: Veronica Lopez, Board Secretary
201 North Figueroa Street, Suite 1030
Los Angeles, CA 90012
veronica.lopez@lacity.org

LADBS NO.:	**BF 250851**
CASE NO.:	**CHC-2007-1585-HCM**
RELATED CASE NO:	**ENV-2019-6645-EIR**
CEQA:	**SCH#2020110210 (EIR)**
Location:	**11973-11975 W. San Vicente Boulevard**
Applicant:	**11973 San Vicente, LLC**
Council District:	**11 – Park**
Community Plan Area:	**Brentwood – Pacific Palisades**

Subject: Comments in Support of the July 8, 2025 Appeal regarding the June 6, 2025 Letter of Determination for the Demolition of the Building Located at 11973 San Vicente Boulevard (Historic-Cultural Monument No. LA-887)

Dear Board President Stevens and Commissioners:

We are providing our comments in support of the July 8, 2025 Appeal by the Angelenos for Historic Preservation regarding the actions taken in the June 6, 2025 Letter of Determination (LOD) by the Los Angeles Department of Building and Safety (LADBS). These comments are also our official objections to the LOD, which we contend was made in error by LADBS. (*Attachment A*)

We are also preserving our rights to provide further comments in support of the above referenced Appeal and objections to the LOD in the future and prior to the Hearing before the LADBS' Board of Commissioners.

In this letter we discuss our objections to all actions taken by LADBS as described in the LOD for the above referenced project.

The proposed demolition of a Historic Cultural Monument, the Barry Building, HCM #887, without a replacement project, has never been done before in the City of Los Angeles. If approved, this would establish a precedent that would threaten all Historic Cultural Monuments in California's largest City.

The applicant has stated their intent publicly, and in the record, to sell the property which would include all of the parcels it owns (under 11973 San Vicente, LLC and 11991 San Vicente, LLC) surrounding the project site.

The Board of Building and Safety Commissioners (Board) should grant the appeal in full, rescinding the Certification of the EIR by LADBS, and rescinding the adoption of the Statement of Overriding Considerations by LADBS.

By doing so, the Board will correct the mistake made by Binh Phan, Permit and Engineering Bureau Chief, who is unqualified to take the CEQA-related actions for this case.

Mr. Phan is the person who authored and signed the LOD. He made determinations, certified the EIR, and adopted the Statement of Overriding Considerations. However, he does not have the qualifications, experience, or training to perform these CEQA-related actions.

He has held the following positions in the City of Los Angeles for the past 14 years [Source: "openpayrolls.com" and "transparentcalifornia.com"]:

Name	Year(s)	Civil Service Job Title/Working Title
Binh Phan	2011	Structural Engineering Associate III
Binh Phan	2012-2014	Structural Engineering Associate IV
Binh Phan	2015	Building Civil Engineer I
Binh Phan	2016-2020	Building Civil Engineer II
Binh Phan	2020	Assistant Deputy Superintendent of Building II
Binh Phan	2022-Present	Deputy Superintendent of Building I /Permit and Engineering Bureau Chief

Note: List of attachments available on page 8

The class specifications for all the positions held by Mr. Phan and the Job Bulletin for his most recent position can be found in Attachment B-1.

None of the Civil Service Class Specifications for the positions held by Mr. Phan qualifies him to process CEQA-related documents, certify an EIR, or adopt a Statement of Overriding Considerations.

The City's most qualified and experienced persons to take CEQA-related actions are employed in the City's Planning Department and in the Planning Department's Office of Historic Resources (OHR).

Staff in the City's Planning Department who worked on this project are all qualified to perform Environmental work per their Civil Service Class Specifications. (*Attachment B-2*)

Name	**Civil Service Job Title**	**Planning Department**
Ken Bernstein	Principal City Planner	Office of Historic Resources
Mindy Nguyen	Senior City Planner	Major Projects
Melissa Jones	City Planner	Office of Historic Resources

The Commissioners of the City's Cultural Heritage Commission (CHC) are also another group of people in the City who are most qualified and experienced to make recommendations of CEQA-related actions concerning Historic Resources.

The CHC unanimously agreed with the Planning Department's Office of Historic Resources against demolition of the Barry Building and against adoption of the Statement of Overriding Considerations.

Instead of creating a "first ever" for the City by allowing the destruction of a Historic-Cultural Monument, the Board can show that Los Angeles treasures its historic resources and can blend "the old with the new" in a new development. This common-sense approach would be environmentally superior and would provide a greater socio-economic benefit to the City instead of only enriching the applicant.

Note: List of attachments available on page 8

Overview:

I. LADBS IS NOT QUALIFIED TO PERFORM CEQA-RELATED ACTIONS DESCRIBED IN THE LETTER OF DETERMINATION

By their own admission, LADBS does not have any experience in certifying an EIR and adopting a Statement of Overriding Considerations.

Mr. Faruk Sezer, Building Civil Engineer, Government and Community Relations wrote in his email from September 11, 2024 that *"Once we receive the letter, the Los Angeles Department of Building and Safety (LADBS) will begin the process of certifying the Environmental Impact Report (EIR)." He further wrote "The format of this certification is still undecided,* ***as LADBS has not issued one in the past." (emphasis added)*** (*Attachment C-1*)

LADBS also provided misleading and conflicting information when asked about the process of filing an Appeal regarding the LOD.

On June 30, 2025, LADBS' Board secretary, Ms. Veronica Lopez, responded to our request to be provided a filled-out copy of the Form named *"Exhibit B" of the LOD, with the following statement "Unfortunately, I do not have an example I can share* ***as your appeal is the first of its kind.***" (*Attachment C-2*)

On June 12, 2025, LADBS' Building Civil Engineer Faruk Sezer responded to our inquiry about timing of filing an appeal. His response was different than the information given by the Board Secretary. (*Attachment C-2*)

Also, the Los Angeles Department of Building and Safety, as well as the entire City of Los Angeles, has never processed an EIR for the demolition of a Historic Cultural Monument <u>without</u> a replacement project.

II. DUE PROCESS, BIAS, AND LACK OF FAIRNESS

The First Amendment of the US Constitution and the California Constitution, Article 1, Section 3 guarantees the rights of the people to petition their government.

A. <u>Restricting Public Participation</u>:

1. The Appeal Process set forth in the LOD impedes the Public's Right to petition their government

Note: List of attachments available on page 8

LADBS restricted and impeded public participation through the appeal process it used in "Exhibit B" of the LOD, which included the form **PC-Build.Mod 00 (Rev.09-11-2019)**, titled "Request for Modification of Building Ordinances".

This form is not applicable to appeal CEQA-related actions. (*Attachment D-1*)

The City of Los Angeles has already established a form and an appeal process to appeal non-Planning Department CEQA related decisions.

LADBS failed to use that form or create its own form which would apply to CEQA-related actions taken by LADBS, and that the use of the form provided by LADBS acts as an impediment to the public's rights to petition their government through the appeal process. (*Attachment D-2*)

Moreover, LADBS has provided conflicting information to our requests for guidance for filing an appeal. (*Attachments C-1, C-2 and C-3*)

2. **Restricting Written Comments from the Public to the LADBS Board**:

In her July 14, 2025 email, LADBS Board Secretary stated that any objections after an appeal is filed would not be accepted by LADBS. (*Attachment E*)

She referred to page 2 of "Exhibit B" of the LOD, which reads in part: "*No additional information will be accepted by the Department after the appeal form has been submitted unless a new appeal form is filed and applicable fees are paid.*" (*Attachment D-1*)

The imposition of additional fees, particularly if they are excessive or serve as an unreasonable barrier, restricts the public's right to petition their government.

There was a deadline of July 11, 2025 in the instance of the above referenced case by which the appeal had to be filed.

Even though the Board Secretary further clarified in her email that this only applies to the appellant, nothing in the LOD explains how additional comments/information could be submitted by an appellant in a CEQA related case and how it would affect the

Note: List of attachments available on page 8

35-day CEQA time limit set by LADBS if comments were submitted after the deadline.

The process on how to submit supporting documents either by the Appellant or other members of the public was flawed, and impeded the people's right to petition their government.

3. Bias and Prejudgment of Facts by Councilmember Traci Park:

CEQA decision-makers act in a quasi-judicial capacity when making decisions on projects that require environmental review. They are expected to be neutral and unbiased, free from personal conflicts of interest, prejudgment of the facts, or prejudice against any of the parties involved.

The above referenced project is located in Councilmember Traci Park's district (CD-11).

Ms. Park made a decision to support demolition of the Barry Building prior to the 09/05/2024 Cultural Heritage Commission (CHC) meeting. She made up her mind without hearing from the CHC Commissioners who are the subject matter experts and the City's most qualified body on Historic Resources.

Out of the public's view and in a non-transparent manner, Councilmember Park's office worked with the applicant to frame CD-11's position and come up with a "preservation covenant" between her office and the applicant. (*Attachment F*, pages 058-059)

Her actions were not neutral, but biased. They were also based on her prejudgment of the facts.

As of the date of this letter, the "preservation covenant" was never made public and was not part of any binding condition on the applicant.

CD-11 Planning Deputy Jeff Khau and Venice Field Deputy Sean Silva attended the 09/05/2024 CHC hearing on the Barry Building (Agenda Item 4).

Mr. Silva presented Ms. Park's position, and he revealed publicly for the first time that Ms. Park was against the Planning Department's Office of Historic Resources (OHR) recommendation to not adopt SOC, and was instead in favor of the demolition of the Barry Building.

The fact that Mr. Silva made his statement prior to hearing the discussion and decision of the Commissioners shows that Ms. Park had already made up her mind before 09/05/2024.

The Commissioners unanimously recommended against demolition and recommended to not adopt the SOC.

To summarize, Ms. Park herself and through her staff:

- Made up her mind before the 09/05/2024 CHC hearing,
- Made prejudicial statements, which can be perceived as an attempt to influence the decision of the CHC, and
- Spoke with the applicant (ex parte) before the CHC hearing, without any input from the public.
- Came up with a written agreement with the applicant that was not shared with the public.

It is likely that this appeal will come before the City Council as that is the final decision-making body for CEQA appeals.

Ms. Park should recuse herself from any future voting or participation in any discussion regarding this project because of the bias she has demonstrated and the prejudgment she used. (*Petrovich Development Company, LLC v. City of Sacramento* (Cal. Ct. App., Apr. 8, 2020, No. C087283)

Conclusion:

Based on all of the issues raised above, we ask that the Board of Building and Safety Commissioners do the following:

1. Grant the 07/08/2025 Appeal in full;
2. Rescind the Certification of the EIR by LADBS; and
3. Rescind the Adoption of the Statement of Overriding Considerations by LADBS

Thank you for your time and consideration of this letter.

Sincerely,

Robert Blue
Robert Blue

Sieglinde Kruse Blue
Sieglinde Kruse Blue

Note: List of attachments available on page 8

CC: Hydee Feldstein-Soto, LA City Attorney
Osama Younan, LADBS' General Manager
Kenneth Fong, LA Deputy City Attorney
Corin Kahn, Esq.

List of Attachments:

Attachment A:	06-06-2025 Letter of Determination for the Barry Building Demolition Project
Attachment B:	Civil Service Class Specifications
Attachment C:	Email Communications
Attachment D-1:	06-06-2025 LOD's "Exhibit B"
Attachment D-2:	City of Los Angeles' Non-Planning Appeal Form
Attachment D-3:	User Instructions for filing a City of Los Angeles' Non-Planning Appeal Form
Attachment E:	07-14-2025 Email Communication Veronica Lopez, LADBS Board Secretary
Attachment F:	Transcript of the 09-05-2024 Cultural Heritage Commission (CHC) Meeting (with highlighted sections for: Sean Silva)

Note: List of attachments available on page 8

Attachment A

06-06-2025 - Letter of Determination for the Barry Building Demolition Project

FORM GEN. 160 (REV. 6-80)

CITY OF LOS ANGELES
DEPARTMENT OF BUILDING AND SAFETY

LETTER OF DETERMINATION

DATE: 06/06/2025

TO: 11973 San Vicente, LLC
C/o Alston & Bird
Attn: Ed Casey
333 Hope Street, 16th Floor
Los Angeles, CA 90071

FROM: Binh Phan, Chief
Permit and Engineering Bureau

SUBJECT: Demolition of the Building Located at 11973 San Vicente Boulevard (Historic-Cultural Monument No. LA-887)

PROJECT DESCRIPTION:

The proposed 11973 W. San Vicente Boulevard Project (Project or Proposed Project) consists of the demolition of an existing two-story commercial building, commonly referred to as the Barry Building, a designated Historic-Cultural Monument.

Pursuant to Los Angeles Municipal Code (LAMC) Section 91.106.4.5, the Department of Building and Safety (LADBS) shall not issue a permit to demolish a building designated as a Historic-Cultural Monument (HCM) without LADBS first determining whether the demolition "may result in the loss of or serious damage to a significant historical or cultural asset." If LADBS determines that such loss or damage may occur, a CEQA clearance is required to be prepared, and if the HCM is considered significant, no demolition permit may be issued without LADBS first "finding that specific economic, social, or other considerations make infeasible the preservation of the building or structure."

To comply with Section 91.106.4.5, the Department of City Planning (DCP) prepared and processed an environmental impact report (EIR), EIR findings, and a statement of overriding considerations for LADBS' consideration for the Proposed Project.

DETERMINATION:

In accordance with the California Environmental Quality Act (CEQA) and related City procedures, the following determinations and actions are taken by LADBS after its review and consideration of the whole of the record, including the EIR, communications by DCP, all submissions by the Applicant's representatives, the recommendation of the Cultural Heritage Commission, and any and all communications on the Project to DCP or LADBS:

1. **Environmental Impact Report Determination**

   Pursuant to CEQA Guidelines Section 15132, it is determined that the Final Environmental Impact Report (FEIR), which includes the Draft EIR (SCH No. 2020110210, ENV-2019-6645-EIR) dated February 2023, the Draft EIR appendices, and the document titled "Final EIR" dated September 2023 (including all related appendices and attachments), complies with CEQA requirements.

2. **Certification of the FEIR**

   The Los Angeles Department of Building and Safety (LADBS) certifies that:

   a. The FEIR has been completed in full compliance with CEQA;
   b. The FEIR was presented to the LADBS and the LADBS has reviewed and considered the information contained in the FEIR prior to approval of the Project, and all of the information contained therein has substantially influenced all aspects of the decision by the LADBS; and
   c. The FEIR reflects the independent judgment and analysis of the LADBS.

3. **Adopts the following:**

   a. The Mitigation Monitoring Program (MMP);
   b. The EIR Findings dated 04/18/2025 (attached at Exhibit 'A');
   c. The Statement of Overriding Considerations, found on pages 36-39 of the EIR Findings (Exhibit "A"). The LADBS further finds that each identified benefit of the Proposed Project, as listed in the Statement of Overriding Considerations, independently justifies approval of the Project and overrides all identified significant and unavoidable impacts of the Proposed Project; and
   d. A finding that based upon the whole of the record, including the EIR Findings and the Statement of Overriding Consideration in Exhibit 'A,' a demolition permit may be issued because specific economic, social, or other considerations make infeasible the preservation of the building at 11973 W. San Vicente Boulevard.

4. **Custodian of Records**

   LADBS records related to this project are available through the LADBS Records Section at the following locations:

   Metro Office
   201 N. Figueroa Street, 1st Floor, Room 110
   Los Angeles, CA 90012

   Van Nuys Office
   6262 Van Nuys Boulevard, 2nd Floor, Room 251
   Van Nuys, CA 91401

All other records of proceedings shall be maintained by the Department of City Planning. The Director of Planning shall serve as the custodian of these records, which are kept at:

Department of City Planning
221 North Figueroa Street, Suite 1350
Los Angeles, CA 90012

5. Notice of Determination

Staff from the Department of City Planning is directed to file a Notice of Determination with the County Clerk in accordance with the Public Resources Code and CEQA Guidelines within five (5) days of mailing of this letter.

NOTICE RE APPEALS:

Appeal to Board of Building & Safety Commissioners

This determination may be appealed pursuant to LAMC Section 98.0403.1(b)(2) by any interested party within thirty-five (35) days of mailing of this letter. To file an appeal, please follow the instructions in Exhibit 'B' and email the applicable completed form to Board of Building and Safety Secretary Veronica Lopez veronica.lopez@lacity.org, (213) 482-7429 or file it in person at 201 North Figueroa Street, Suite 1030 Los Angeles, CA 90012.

CEQA Appeal

This determination and any determination upon an appeal described in Exhibit 'B' is an "approval" and a final decision for purposes of CEQA. If the determination is upheld on an appeal to the Board of Building and Safety Commissioners (Board), the Board's determination is appealable to the City Council pursuant to LAMC Section 13B.11.1.F. If this determination is not appealed, the determination is final for purposes of CEQA and no further CEQA appeal is available, including upon issuance of the demolition permit after referral to the Cultural Heritage Committee, as described below.

Referral to CHC

To the extent this decision becomes final, either because no appeal is filed or it is ultimately upheld on appeal, before issuance of the demolition permit on the Project, the demolition permit will be referred to the Cultural Heritage Commission (CHC) pursuant to Los Angeles Administrative Code (LAAC) Sections 22.171.14 and 22.171.15. Under these Sections, the CHC and the City Council have authority to suspend issuance of a demolition permit to hold public hearings addressing preservation of a monument, but CHC and the City do not have the authority to condition or deny a demolition permit for any purpose, including to mitigate or avoid environmental impacts. As such, any action under LAAC Sections 22.171.14 or 22.171.15 is not appealable for purposes of CEQA or otherwise.

Please feel free to contact me for further details or clarifications.

Attachments: Exhibit 'A' EIR Findings
Exhibit 'B' DBS Information Bulletin re Appeals

cc: Vincent P. Bertoni, AICP, Director of Planning
Milena Zasadzien, Principal City Planner
Mindy Nguyen, Senior City Planner

"Exhibit A"

06/06/2025

EIR Findings

I. Introduction.

The Environmental Impact Report (EIR), consisting of the Draft EIR and the Final EIR, is intended to serve as an informational document for public agency decision-makers and the general public regarding the objectives and environmental impacts of 11973 San Vicente Boulevard Project (Project), located at 11973-11975 San Vicente Boulevard (Assessor Parcel No. 4404-025-008), on the north side of San Vicente Boulevard between Montana Avenue and Saltair Avenue (Site or Project Site). The Project consists of demolition of the existing two-story commercial building, commonly referred to as the Barry Building, located on the Project Site. The existing building is a City of Los Angeles Historic-Cultural Monument (HCM) that has been vacant and fenced since 2017. The proposed Project consists of the demolition of the Barry Building. Once demolition activities are complete, the portion of the Project Site that currently contains the Barry Building would be a vacant lot, and the existing surface parking lot would remain. A landscape buffer would be installed along the southern boundary of the Project Site (fronting San Vicente Boulevard). No future development of the Project Site is proposed or considered as part of the Project.

The City of Los Angeles (City), as Lead Agency, has evaluated the environmental impacts of implementation of the Project by preparing an environmental impact report (EIR) (Case Number ENV-2019-6645-EIR/State Clearinghouse No. 2020110210). The EIR was prepared in compliance with the California Environmental Quality Act of 1970 (CEQA), Public Resources Code (PRC) Section 21000 et seq. and the California Code of Regulations Title 15, Chapter 6 (CEQA Guidelines). The findings discussed in this document are made relative to the conclusions of the EIR.

PRC Section 21002 provides that "public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects[.]" The procedures required by CEQA "are intended to assist public agencies in systematically identifying both the significant effects of proposed projects and the feasible alternatives or feasible mitigation measures which will avoid or substantially lessen such significant effects." PRC Section 21002 goes on to state that "in the event [that] specific economic, social, or other conditions make infeasible such project alternatives or such mitigation measures, individual projects may be approved in spite of one or more significant effects thereof."

The mandate and principles announced in PRC Section 21002 are implemented, in part, through the requirement that agencies must adopt findings before approving projects for which EIRs are required. (See PRC Section 21081[a]; CEQA Guidelines Section 15091[a].) For each significant environmental impact identified in an EIR for a proposed project, the approving agency must issue a written finding, based on substantial evidence in light of the whole record, reaching one or more of the three possible findings, as follows:

1) Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the significant impacts as identified in the EIR.

2) Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been, or can or should be, adopted by that other agency.

3) Specific economic, legal, social, technological, other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the EIR.

The findings reported in the following pages incorporate the facts and discussions of the environmental impacts that are found to be significant in the Final Environmental Impact Report for the project as fully set forth therein. Although Section 15091 of the CEQA Guidelines does not require findings to address environmental impacts that an EIR identifies as merely "potentially significant", these findings nevertheless fully account for all such effects identified in the Final EIR for the purpose of better understanding the full environmental scope of the Project. For each environmental issue analyzed in the EIR, the following information is provided:

The findings provided below include the following:

- Description of Significant Effects - A description of the environmental effects identified in the EIR.
- Project Design Features - A list of the project design features or actions that are included as part of the Project.
- Mitigation Measures - A list of the mitigation measures that are required as part of the Project to reduce identified significant impacts.
- Finding - One or more of the three possible findings set forth above for each of the significant impacts.
- Rationale for Finding - A summary of the rationale for the finding(s).
- Reference - A reference of the specific section of the EIR which includes the evidence and discussion of the identified impact.

With respect to a project for which significant impacts are not avoided or substantially lessened either through the adoption of feasible mitigation measures or feasible environmentally superior alternatives, a public agency, after adopting proper findings based on substantial evidence, may nevertheless approve the project if the agency first adopts a statement of overriding considerations setting forth the specific reasons why the agency found that the project's benefits rendered acceptable its unavoidable adverse environmental effects. (CEQA Guidelines Sections 15093, 15043[b]; see also PRC Section 21081[b].)

II. Environmental Review Process.

For purposes of CEQA and these Findings, the Record of Proceedings for the Project includes (but is not limited to) the following documents:

Initial Study. The Project was reviewed by the City of Los Angeles Department of City Planning (Lead Agency) in accordance with the requirements of the CEQA (PRC 21000 et seq.). The City prepared an Initial Study in accordance with Section 15063(a) of the State CEQA Guidelines in November 2020. The Initial Study is included as Appendix A-1 of the Draft EIR.

Notice of Preparation. Pursuant to the provisions of Section 15082 of the State CEQA Guidelines, the City then circulated a Notice of Preparation (NOP) to State, regional and local agencies, and members of the public for a 33-day period commencing on November 18, 2020,

and ending on December 12, 2020. The purpose of the NOP was to formally inform the public that the City was preparing a Draft EIR for the Project, and to solicit input regarding the scope and content of the environmental information to be included in the Draft EIR. Written comment letters responding to the NOP were submitted to the City by from four agencies and organizations (Department of Transportation, Department of Fish and Wildlife, Native American Heritage Commission, and South Coast Air Quality Management District) and from individuals. The NOP and NOP comment letters are included in Appendix A-2 and A-3 of the Draft EIR.

Draft EIR. The Draft EIR evaluated in detail the potential effects of the Project. It also analyzed the effects of a reasonable range of alternatives to the Project, including a "No Project" alternative. The Draft EIR for the Project (State Clearinghouse No. 2020110210), incorporated herein by reference in full, was prepared pursuant to CEQA and State, Agency, and City CEQA Guidelines (City of Los Angeles California Environmental Quality Act Guidelines). The Draft EIR was circulated for a 46-day public comment period beginning on February 16, 2023, and ending on April 3, 2023. That comment period was extended by the Lead Agency for 15 days to and through April 18, 2023. A Notice of Availability (NOA) was distributed on February 16, 2023, to all property owners within 500 feet of the Project Site and interested parties, which informed them of where they could view the document and how to comment. The Draft EIR was available to the public at the City of Los Angeles, Department of City Planning, and the following local libraries: Los Angeles Central Library, West Los Angeles Regional Library, and the Donald Bruce Kaufman Branch Library. A copy of the document was also posted online at https://planning.lacity.org. Notices were filed with the County Clerk on February 16, 2023.

Notice of Completion. A Notice of Completion was sent with the Draft EIR to the Governor's Office of Planning and Research State Clearinghouse for distribution to State Agencies on February 15, 2023, and notice was provided in newspapers of general and/or regional circulation.

Final EIR. The City released a Final EIR for the Project on September 11, 2023, which is hereby incorporated by reference in full. The Final EIR constitutes the second part of the EIR for the Project and is intended to be a companion to the Draft EIR. The Final EIR also incorporates the Draft EIR by reference. Pursuant to Section 15088 of the CEQA Guidelines, the City, as Lead Agency, reviewed all comments received during the review period for the Draft EIR and responded to each comment in Section II, Responses to Comments, of the Final EIR. On September 7, 2023, responses were sent to all public agencies that made comments on the Draft EIR at least 10 days prior to certification of the EIR pursuant to CEQA Guidelines Section 15088(b). Notices regarding availability of the Final EIR were also sent to property owners and occupants within a 500-foot radius of the Project Site, as well as anyone who commented on the Draft EIR, and interested parties.

Cultural Heritage Commission. On September 5, 2024, the Cultural Heritage Commission (CHC) considered the matter of certification of the EIR by LADBS and instructed staff to communicate their recommendation to LADBS action on certification of the EIR and adoption of the Statement of Overriding Considerations.

III. Record of Proceedings.

For purposes of CEQA and these Findings, the Record of Proceedings for the Project includes (but is not limited to) the following documents and other materials that constitute the administrative record upon which the City approved the Project. The following information is incorporated by reference and made part of the record supporting these Findings of Fact:

- All Project plans and application materials including supportive technical reports;
- The Draft EIR and Appendices, and Final EIR and Appendices, and all documents relied upon or incorporated therein by reference;
- The Mitigation Monitoring Program (MMP) prepared for the Project;
- The City of Los Angeles General Plan and related EIR;
- The Southern California Association of Governments (SCAG)'s 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) and related EIR (SCH No. 2019011061);
- Municipal Code of the City of Los Angeles;
- All records of decision, resolutions, staff reports, memoranda, maps, exhibits, letters, minutes of meetings, summaries, and other documents approved, reviewed, relied upon, or prepared by any City commissions, boards, officials, consultants, or staff relating to the Project;
- Any documents expressly cited in these Findings of Fact, in addition to those cited above; and
- Any and all other materials required for the record of proceedings by PRC Section 21167.6(e).

Pursuant to PRC Section 21081.6(a)(2) and CEQA Guidelines Section 15091(e), the documents and other materials that constitute the record of proceedings upon which the City has based its decision are located in and may be obtained from the Department of City Planning, as the custodian of such documents and other materials that constitute the record of proceedings, located at the City of Los Angeles, Figueroa Plaza, 221 North Figueroa Street, Room 1350, Los Angeles, CA 90012.

In addition, copies of the Draft EIR and Final EIR are available on the Department of City Planning's website at https://planning.lacity.org/development-services/eir (to locate the documents, search for either the environmental case number or project title in the Search Box). The Draft and Final EIR are also available at the following three Library Branches:

- Los Angeles Central Library—630 West Fifth Street, Los Angeles, CA 90071
- West Los Angeles Regional Library—11360 Santa Monica Blvd., Los Angeles, CA 90025
- Donald Bruce Kaufman Branch Library—11820 San Vicente Blvd., Los Angeles, CA 90049

IV. Project Description.

The Project consists of the demolition of the Barry Building, a two-story commercial building on a 0.61-acre site (APN 4404-025-008) located at 11973-11975 San Vicente Boulevard.

In 2007, the City of Los Angeles Cultural Heritage Commission designated the building as HCM No. 887. The building has been vacant and fenced off since 2017, and is boarded up with screwed-on plywood panels to prevent vandalism, loitering, and other public safety hazards associated with the current vacancy of the Barry Building.

The building is subject to the City's Soft Story Retrofit Program (LAMC Section 91.9300 et seq., Ordinance 183,893 entitled Mandatory Earthquake Hazard Reduction in Existing Wood Frame Buildings with Soft, Weak or Open Front Walls ["Soft Story Ordinance"]). The Ordinance applies to buildings with a "soft story," or building (or portion thereof) with no ascertainable lateral system. (See *11971 San Vicente Boulevard – Retrofit Schemes (Soft Story Memorandum),* Englekirk Structural Engineers (Rev. June 3, 2022) included as Appendix H-3 to the Draft EIR). The Soft Story Ordinance requires the owner of each building within the Ordinance's scope to undertake a structural analysis of the building. If the building does not meet the minimum earthquake standards specified, "the owner shall cause the building to be structurally altered to conform to such standards or, at the owner's option, cause it to be demolished within the time limits stated." (LAMC Section 91.9305.1.) In March 2018, the City of Los Angeles issued the Project Applicant an Order to Comply with the City's Soft Story Retrofit Program. Specifically, the Order to Comply requires the Project Applicant to comply with the following requirements as set forth in LAMC Section 91.9305.2

The building must be renovated or demolished in accordance with the Soft Story Ordinance or face penalties. A seismic assessment of the building was prepared. (See *11973 San Vicente Boulevard ASCE 41-13 Seismic Assessment,* Englekirk Structural Engineers (June 6, 2022), included as Appendix G to the Draft EIR.) The retained structural engineers identified that only a portion of the building has a "soft story" and is required to comply with the Ordinance. (See *11971 San Vicente Boulevard – Retrofit Schemes (Soft Story Memorandum),* Englekirk Structural Engineers (Rev. June 3, 2022) included as Appendix H-3 to the Draft EIR. See also *11971 San Vicente Boulevard – Retrofit Schemes (Soft Story Retrofit Letter Report)*, Englekirk Structural Engineers (June 1, 2021) included as Attachment H-2 to the Draft EIR.) The seismic assessment determined that there are high levels of overstress in the other portions of the building, and that the building is likely to suffer significant damage when subject to a moderate to strong earthquake in the Los Angeles basin, which presents a safety hazard to people in and around the building. The seismic engineers determined that additional renovations would be required to make the building suitable for occupancy above those required by the Soft Story Ordinance.

Englekirk Structural Engineers also determined that the seismic instability of the Barry Building is due to its 1950's building design, rather than lack of maintenance or neglect on behalf of the owner. Buildings designed and constructed in the early 1950's had low seismic demands and requirements; however, current requirements are much higher. Englekirk also noted, as in its prior report, in addition to the seismic retrofit work required under the Soft Story Ordinance for the south wing of the building, the north, east, and west wings of the building are currently up to 650% overstressed and would also require renovation. While the California Historical Building Code allows historic buildings to meet only 75% of the current building code forces, due to the very high level of overstress in the building substantial work, including strengthening the existing shear walls and floor/roof plywood diaphragm, and adding shear walls and moment frames would still be required. Temporary wooden frames are not a valid retrofit option because it would not meet current requirements under either the Uniform Building Code or the Historical Building Code. (See *Barry Building (11973 San Vicente Boulevard, Los Angeles, CA 90049) Los Angeles Conservancy Comments Review*, Englekirk Structural Engineers, (May 25, 2023), included as Attachment I to the Final EIR.)

Per LAMC Section 91.9305.1, which provides that it is "the owner's option" to demolish the building, the Project Applicant has proposed to demolish the existing building in order to comply with the Soft Story Ordinance.

Once demolition activities are complete, the portion of the Project Site that currently contains the Barry Building would be a vacant lot, and the portion of the existing surface parking lot that is on the Project Site would remain. Demolition would take place within the Project Site, while the adjacent parcel to the north (APN 4404-025-016, which is not part of the Project Site) would be used for staging. No demolition work is proposed within the public right-of-way. Demolition of the building would result in the removal of approximately 4,174 cubic yards of debris from the Project Site, including approximately 130 cubic yards of asbestos-containing materials and 4,044 cubic yards of demolition materials.

In accordance with the San Vicente Scenic Corridor Specific Plan, a landscape buffer would be installed along the southern boundary of the Project Site (fronting San Vicente Boulevard). As part of the Project, three on-site palm trees would be removed (a Chinese windmill palm, a king palm, and a queen palm); however, the fourth on-site palm (Mexican fan palm) in the surface parking lot and two street trees (both London plane trees) located along San Vicente Boulevard would remain.

The Project is anticipated to last approximately 36 working days, with one additional day to plant the landscape buffer.

No future development of the Project Site is proposed and/or considered as part of the Project. No additional permits, approvals, or entitlements are requested. To this end, the Project Applicant has provided a statement, signed and notarized, that certifies that the permit for demolition is not sought to facilitate construction or development of a larger project. (See Attachment to Application for Demolition Permit: Owner's Declaration Related to CEQA and Project Scope, included as Attachment B-2 to the Final EIR.)

V. No Impact or Less than Significant Impact without Mitigation

The impacts of the Project that were determined to have no impact or be less than significant in the EIR (including having a less than significant impact as a result of implementation of project design features and compliance with existing regulations) and that require no mitigation are identified below. The City has reviewed the record and agrees with the conclusion that the following environmental impacts would not be significantly affected by the Project and therefore, no additional findings are needed. The following information does not repeat the full discussions of environmental impacts contained in the EIR. The City ratifies, adopts, and incorporates the analysis, explanation, findings, responses to comments, and conclusions of the EIR.

Summary of Impacts Evaluated in the Initial Study Only

The Initial Study (Appendix A-1 of the Draft EIR) considered effects with respect to the following: aesthetics, agricultural and forestry resources, air quality (odors), biological resources, cultural resources (archeological resources and human remains), energy, geology and soils, hazards and hazardous materials, hydrology and water quality, land use and planning (physically divide an established community), mineral resources, noise (airport noise), population and housing, public services, recreation, transportation/traffic (plan consistency, VMT, and design feature hazards), utilities and service systems, and wildfire, but found that the Project would either have no impact or a less than significant impact with respect to each of these topics. No mitigation was required, and no further analysis of these topics was needed in the Draft EIR. (See Initial Study attached as Appendix A-1 to the Draft EIR, and Draft EIR Section VI.6.)

Aesthetics: The Project would not have a substantial adverse on a scenic vista, scenic resources, public views, or create a new source of light or glare. While the Project Site is located within the boundaries of the San Vicente Scenic Corridor Specific Plan, the plan area is not considered a scenic vista, and the Specific Plan establishes streetscape and urban design criteria only to protect the pedestrian-scale and community-oriented commercial nature along San Vicente Boulevard. Since no future development of the Project Site is proposed or considered as part of the Project, the Project would not increase building height on the Project Site or alter panoramic views that include the Project Site or interfere with current views. In addition, the Project would not conflict with applicable regulations governing scenic quality. The aesthetic impact was therefore determined to be less than significant. (Appendix A-1 to the Draft EIR, page 24. See also Draft EIR, page VI-9.)

Agricultural and Forestry Resources: The Project Site is currently developed with a commercial building, does not contain any agricultural uses. The Project Site is currently zoned C4-1VL, for commercial uses, and is not zoned for agricultural use, forest land or timberland. The Initial Study determined that the Project would have no impact on agricultural or forestry resources, as it would not convert any farmland, does not conflict with any agricultural zoning, would not result in forest loss, nor would it create changes to the existing environment which could result in the loss of agricultural or forested land. (See Appendix A-1 to the Draft EIR, page 31.).

Air Quality (odors): The Project consists solely of the demolition of the existing commercial building, and no future development of the Site is proposed and/or considered as part of the Project. Therefore, the Project would not include any of the uses identified by the SCAQMD *CEQA Air Quality Handbook* as being associated with substantial odors. Further, any odors that may be generated during demolition would be localized and temporary in nature, and would not have the potential to affect a substantial number of people or result in a nuisance as defined by SCAQMD Rule 402. (See Appendix A-1 to the Draft EIR, page 36.)

Biological Resources: Due to the developed nature of the Project Site and lack of any natural open spaces, there are no candidate, sensitive, or special status species identified that would be impacted by the Project.[1] Furthermore, there are no riparian areas, sensitive natural communities, or Significant Ecological Areas as defined by the City of Los Angeles located on or adjacent to the Project Site. Demolition of the existing building would not interfere substantially with any established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites. (See Appendix A-1 to the Draft EIR, page 37.)

Cultural Resources (archeological resources and human remains): The Project Site is located in an urbanized area of the City and has been disturbed by past development activities.

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[1] Cycads have been identified by a commentator as existing in the courtyard of the Barry Building. However, cycads are not native to California and are not protected by California native plant protection laws, the California Endangered Species Act (CESA), or addressed by the Appendix G questions in CEQA (thresholds of significance) which specifically refer to native plants. (See Email from Jacqueline Bowland Worden, Lead Biologist/Natural Resources Project Manager, SWCA Environmental Consultants (May 26, 2023) included as Attachment K-2 to the Final EIR and *The Barry Building – 11973 San Vicente Boulevard, Los Angeles, California 90049*, Carlberg Associates (May 19, 2023) included as Attachment K-1 to the Final EIR.)

There are no known archaeological resources at the Project Site, nor are there any known traditional burial sites or other type of cemetery usage has been identified with the Project Site and immediate vicinity. As such, Project impacts would be less than significant to archeological cultural resources and human remains, and no further analysis of this topic in the EIR was required. (See Appendix A-1 to the Draft EIR, page 41.) Additional analysis of Cultural Resources (historic resources) was provided in the Draft EIR. (See Section IV.B of the Draft EIR.)

Energy: The proposed demolition activities would consume relatively minor quantities of electricity. No future development of the Site is proposed and/or considered as part of the Project; therefore, the Project would not have an operational demand for energy, with the exception of a limited amount of electricity for sprinklers to water the landscape buffer. Thus, the Project would not result in an increase in demand for electricity, natural gas, or petroleum that exceeds available supply or distribution infrastructure capabilities. (See Appendix A-1 to the Draft EIR, page 44.)

Geology and Soils: Impacts related to geology and soils are all less than significant. The Project Site is not located within a known earthquake fault, nor is it within a liquefaction zone. As the Project involves the demolition of an existing seismically unsafe building, the Project would not expose people or structures to substantial adverse effects associated with geology or soils. (See Appendix A-1 to the Draft EIR, page 52.)

Hazards and Hazardous Materials: Based on the age of the existing building, it is assumed that it contains asbestos containing materials (ACMs). In accordance with existing rules and regulations, all materials which are identified as ACMs, would be removed by a trained and licensed asbestos abatement contractor. The Project will not create any significant impacts related to hazards or hazardous materials. (See full analysis in Appendix A-1 to the Draft EIR, page 60.)

Hydrology and Water Quality: Based on the limited timeframe for demolition (seven weeks), the small size of the Project Site, the additional pervious area on the Site after demolition, and the lack of an operational component to the Project, the Project would not be expected to substantially degrade surface or ground water quality or conflict with any water quality standards or plans. Impacts on hydrology and water quality would be less than significant. (See Appendix A-1 to the Draft EIR, page 65.)

Land Use and Planning (physically divide an established community): The Project does not contain features such as highways or new infrastructure that would cause a permanent disruption in the physical arrangement of the surrounding uses. Therefore, no impact would occur. Additional Land Use and Planning impacts are discussed below. (See Appendix A-1 to the Draft EIR, page 70.)

Mineral Resources: The Project would not result in the loss of a known mineral resource; Project Site is not located within a City-designated oil field or oil drilling area, nor is the Project Site is located within a City-designated Mineral Resource Zone where significant mineral deposits are known to be present. Demolition of the Barry Building will have no impact on mineral resources. (See Appendix A-1 to the Draft EIR, page 71.)

Noise (Operational Noise and Vibration, Airport noise): The Project would not include an operational phase, and therefore would not result in impacts related to operational noise or operational vibration. The Project Site is not located within an airport land use plan or within two miles of a public airport or public use airport. There are no private airstrips in the vicinity of the Project Site. Therefore, no impact would occur. Additional noise impacts are discussed below. (See Appendix A-1 to the Draft EIR, page 73.)

Population and Housing: The Project-related demolition activities would not represent a permanent or substantial new employment generator that would result in substantial unplanned population growth either directly or indirectly. The Project would not displace any housing or residents, as there is no housing on the Project Site. Therefore, no impact would occur. (See Appendix A-1 to the Draft EIR, page 75.)

Public Services: The Project would not result in substantial adverse physical impacts associated with the need or provision of new or physically altered governmental facilities. Demolition activities associated with the Project may temporarily increase demand for fire protection (emergency medical services) and police protection, however, demolition activities would be required to comply with all applicable federal, State, and City safety regulations and impacts would be less than significant. As there is no operational component to the Project, there is no impact to schools, parks, or other public facilities. (See Appendix A-1 to the Draft EIR, page 77.)

Recreation: No future development of the Site is proposed and/or considered as part of the Project. Thus, he Project would have no impact on recreation. (See Appendix A-1 to the Draft EIR, page 84.)

Transportation (plan consistency, VMT, and design feature hazards): The demolition of the Barry Building would not conflict with any program plan or policy regarding the circulation system, nor would it conflict with CEQA Guidelines Section 15064.3, subdivision (b) (regarding VMT), or increase hazards due to a geometric design feature. Thus, there would be no impact to these areas. (See Appendix A-1 to the Draft EIR, page 86.)

Utilities and Service Systems: Demolition and construction activities typically do not involve the consumption of natural gas, the need for telecommunications infrastructure, or result in the generation of wastewater that would need to be treated by wastewater treatment infrastructure that serves the Project Site. There is sufficient landfill capacity to accommodate the solid waste generated by the demolition of the existing building, and impacts would be less than significant. (See Appendix A-1 to the Draft EIR, page 92.)

Wildfire: The Project Site is not located in or near a state responsibility area, within a City-designated Very High Fire Hazard Severity Zone, or within a City-designated buffer zone. Therefore, no impact regarding this topic would occur. (See Appendix A-1 to the Draft EIR, page 97.)

Cumulative Impacts: With regards to cumulative effects with respect to aesthetics, agricultural resources, biological resources, energy, geology and soils, hazards and hazardous materials, hydrology and water quality, mineral resources, population and housing, public services, recreation, utilities and service systems, and wildfire as identified in the Initial Study, the Project's

incremental contribution to potential cumulative impacts would not be cumulatively considerable as the Project would either have no impact or a less than significant impact with respect to these topics, and therefore could not combine with other projects to result in cumulative impacts. (See Appendix A-1 to the Draft EIR, page 100.)

Summary of Impacts Evaluated in the EIR

The Draft EIR concluded that the following applicable impacts would be less than significant without additional mitigation: Air Quality, Noise (groundborne vibration) Greenhouse Gas Emissions, Transportation/Traffic (emergency access) and Tribal Cultural Resources. (See Draft EIR Section I at I-7 and Section VI.6.) The EIR also considered potential cumulative impacts for each impact. The related projects list consists of seven projects provided by the City of Los Angeles Department of Transportation (LADOT) detailed in Section III of the Draft EIR. (See Table III-1, page III-3.)

Air Quality: The Project includes the demolition of the existing building, but no future development of the Project Site is proposed and/or considered as part of the Project. The demolition would be short term and as a result would not exceed any applicable air quality thresholds. Ss discussed in Section IV.A of the Draft EIR, the Project would not conflict with or obstruct implementation of the applicable air quality plan, exceed any applicable significance threshold or regulatory standard, or expose any sensitive receptors to substantial pollutant concentrations. Finally, the Project would not result in any significant cumulative air quality impacts and thus would not require any mitigation. (See full analysis in Section IV.A of the Draft EIR.) No significant cumulative impacts to air quality were identified, and no mitigation measures are required. (See Draft EIR, Section IV.A-37.)

Greenhouse Gas Emissions: The EIR compared the Project's characteristics with applicable regulations, plans, and policies to reduce greenhouse gas (GHG) emissions and found that the project would not conflict with plan, policy, or regulation adopted for the purpose of reducing GHG emissions. Thus, as noted in Section IV.C of the Draft EIR, impacts are less than significant, and no mitigation is required. (See Section IV.C of the Draft EIR.) In addition, no significant cumulative impacts to GHG emissions were identified, and no mitigation measures are required. (See Draft EIR Section IV.C-39.)

Land Use and Planning (conflict with plan or policy): With regard to the San Vicente Scenic Corridor Specific Plan, the issuance of a Demolition Permit will not change the land use or zoning designations of the Project Site. A vacant lot is not on the list of uses prohibited within the Specific Plan (Specific Plan, Section 5: Uses). A discussion of the Project's consistency with the applicable provisions of the San Vicente Scenic Corridor Specific Plan is provided in Table 4.I-3 of the Initial Study (Appendix A-1 to the Draft EIR) and a discussion of the Project's consistency with the applicable design guidelines contained in the San Vicente Scenic Corridor Specific Plan is provided in Table 4.I-4 of the Initial Study (Appendix A-1 to the Draft EIR. See also IV.D of the Draft EIR.). The Project would not conflict with any of those applicable policies and guidelines, and thus no impacts would occur. Cumulative impacts related to land use and planning would be less than significant without mitigation.

Noise (groundborne construction vibration): The Project's estimated construction vibration impacts at nearby receptors sensitive to the human annoyance effects of ground-borne vibration would not exceed the applicable 72 VdB threshold of significance. As a result, the Project's human

annoyance-related vibration impacts as generated by on-site construction activities would be less than significant. Off-site vibration was also analyzed by the EIR and was found to be less than significant, and no mitigation is required. (See Section IV.E of the Draft EIR.) Cumulative on-site and off-site construction vibration impacts related to human annoyance would be less than significant. (See Draft EIR Section IV.E-35.)

Transportation/Traffic (emergency access): Project construction activities would not generate a significant number of daily trips during peak hours or increase congestion in the Project vicinity that could affect emergency access. The Project's impacts to transportation / traffic are less than significant. (Section IV.F of the Draft EIR). In addition, the Project includes a Project Design Feature (PDF-TRA-1 Demolition Management Plan) requiring the Project Applicant to prepare a detailed Demolition Management Plan. (See Section IV.F of the Draft EIR, page IV.F-12.) The Project's cumulative impacts related to emergency access would be less than significant. (See Draft EIR Section IV.F-17.)

Tribal Cultural Resources: No specific tribal cultural resources were identified at the Project Site by either a sacred lands file search, a California Historical Resources Information System records searches, or in consultation with California Native American Tribes. The Project Site was determined to have a low sensitivity for containing unknown tribal cultural resources, and the Project would only disturb soils that have been previously disturbed by past development activities. Therefore, Project's impacts with respect to tribal cultural resources would be less than significant without mitigation, as noted in Section IV.G of the Draft EIR. cumulative impacts to tribal cultural resources would be less than significant and would not be cumulatively considerable. (See Draft EIR Section IV.G-12.)

VI. Less than Significant Impacts with Mitigation

The EIR determined that the Project has potentially significant environmental impacts in the areas discussed below. The EIR identified feasible mitigation measures to avoid or substantially reduce the environmental impacts in these areas to a level of less than significant. Based on the information and analysis set forth in the EIR, the Project would not have any significant environmental impacts in these areas, as long as all identified feasible mitigation measures are incorporated into the Project. The City again ratifies, adopts, and incorporates the full analysis, explanation, findings, responses to comments, and conclusions of the EIR.

Noise (temporary or permanent increase in noise)

Impact Summary

The Project Site is occupied by an approximately 13,956 square foot commercial building that is vacant and boarded up, and is therefore assumed to generate no noise. Construction would generate noise during the approximately 36 working days of demolition activities (see Table II-1 in Section II of the Draft EIR, Project Description, for the proposed Project schedule), with one additional day to install the landscape buffer.

The Draft EIR evaluated the noise expected as a result of the Project through on-site construction, off-site construction, and vibration-producing activities (discussed previously). Analysis of the activities and equipment planned to be used at the Project Site evaluated the unmitigated noise impacts that could result from excavator and loader usage during the Project's proposed demolition of the Barry Building. Noise increases at 640 Saltair Avenue, 11900 Saltair Terrace,

and 529 Westgate. Avenue could exceed the City's 5 dBA Leq increase significance criteria. As a result, without mitigation, this impact would be considered significant.

With respect to LAMC Section 112.05, no individual piece of equipment (i.e., no individual excavator or loader or backhoe) is estimated to generate a noise level in excess of 75 dBA L_{eq} as measured at a distance of 50 feet. As a result, the Project's impact as it pertains to the generation of noise levels in excess of noise ordinance standards would be considered less than significant.

The Project would also generate noise at off-site locations from haul trucks removing debris from the Project Site during demolition activities. Haul trucks would access the Project Site via San Vicente Boulevard. According to FHWA TNM 2.5 modeling, the Project's off-site noise impacts from construction-related traffic truck traffic would be less than significant.

The Project, together with related projects and future growth, was evaluated for potential cumulative noise impacts. A total of seven related projects were identified in the study area. (See Table III-1 for list of related projects.) The closest related project is more than 1,000 feet from the Project Site; it would not combine with the Project to result in a cumulative construction noise impact. The Draft EIR determined that cumulative noise due to construction truck traffic from the Project and related projects would not have the potential to exceed the ambient noise levels along the haul route or other streets by 5 dBA. Thus, Project impacts would not be cumulatively considerable and cumulative construction noise impacts would be less than significant.

Project Design Features

No specific project design features (PDFs) are proposed with regard to noise.

Mitigation Measures

To ensure that the Project's construction-related noise increases at 640 Saltair Avenue, 11900 Saltair Terrace, and 529 Westgate Avenue do not exceed the City's 5 dBA L_{eq} threshold of significance, the following mitigation measure is required:

MM-NOI-1 Sound barriers rated to achieve a sound attenuation of at least 15 dBA shall be erected along the following boundaries:

- The east and west parking area boundaries (both the Project Site's east and west parking area boundaries and the east and west boundaries of the parcel immediately to the north of the Project Site (APN 4404-025-016)). (While the parcel to the north of the Project Site is not part of the Project, that parcel would be used for construction staging.)
- The northern property line of the parcel to the north of the Project Site (APN 4404-012-016) that separates this parcel from the residential uses to the north. Sound barriers along this property line shall be connected to the previously described sound barriers for the east and west property lines, so that there are no gaps.

All sound barriers shall be tall enough to shield line of sight paths from operating demolition equipment to the 2nd stories of nearby residential uses. The prescribed sound barriers shall be installed for the duration of the Project's demolition activities, which are estimated to last approximately 36 working days. At plan check, building plans shall include documentation prepared by a noise consultant to verify compliance with this measure.

Finding

Changes or alterations have been required in, or incorporated into, the project which mitigate or avoid the significant effects on the environment (PRC Section 21081(a)(1))

Rationale for Finding

Implementation of Mitigation Measure MM-NOI-1 would reduce demolition-related noise impacts to below the City's 5 dBA L_{eq} significance criteria. As shown in Draft EIR Section IV.E, Table IV.E-7, building demolition-related noise increases at 640 Saltair Avenue, 11900 Saltair Terrace, and 529 Westgate Avenue would be no greater than 1.1 dBA after implementation of Mitigation Measure MM-NOI-1. Therefore, the Project's noise impact from on-site demolition activities would be considered less than significant with mitigation.

Reference

See Draft EIR Section IV.E and Appendix D of the Draft EIR for complete analysis of the noise impacts, thresholds, and evaluation methods conducted for the Project.

VII. Significant and Unavoidable Impacts

The Final EIR determined that the environmental impacts set forth below are significant and unavoidable. In order to approve the project with significant unmitigated impacts, the City is required to adopt a Statement of Overriding Considerations, which is set forth in Section XII, below. No additional environmental impacts other than those identified below will have a significant effect or result in a substantial or potentially substantial adverse effect on the environment as a result of the construction or operation of the project. The City finds and determines that:

a) All significant environmental impacts that can be feasibly avoided have been eliminated, or substantially lessened through implementation of the project design features and/or mitigation measures; and

b) Based on the Final EIR, the Statement of Overriding Considerations set forth below, and other documents and information in the record with respect to the construction and operation of the project, all remaining unavoidable significant impacts, as set forth in these findings, are overridden by the benefits of the project as described in the Statement of Overriding Considerations for the construction and operation of the project and implementing actions.

Cultural Resources (historic resources)

Impact Summary

The Barry Building was constructed in 1951 by David Barry, Jr., who hired architect Milton Caughey[2] to design the two-story commercial office building with shops on the ground floor, wrapping a central courtyard lushly landscaped with tropical plants. In 1993, a one-story receiving and storage addition was constructed on the north side of the building. An additional alteration in that area in 1993 was removal of the screens separating the rear patios from the parking lot. A

[2] Caughey's work consisted primarily of residences and schools; the Barry Building is one of his few commercial projects.

ramp was added on the southeast side to enter the courtyard space. The landscaped courtyard has also been altered over time.

The Project Site is currently developed with the two-story Barry Building and a surface parking lot. It is set back from San Vicente Boulevard by a narrow concrete-paved plaza with low planters. The building is flanked to the east by a shared driveway and to the north by the surface parking lot. The building consists of four wings of offices around a central garden courtyard, forming an open square in plan. The building has flat roofs at varying heights, with parapets around the perimeter and cantilevered plaster soffits with wood fascia around the courtyard. Two curved staircases, one in the northeast corner and one in the southwest corner, provide access to the cantilevered second-story balconies that encircle the courtyard. Each staircase consists of "floating" concrete treads in steel pans supported on triangular concrete mono stringers, with metal pipe railings.

The second story of the south wing is supported on slender steel pipe columns, leaving the ground floor open to both San Vicente Boulevard and the central courtyard. A small freestanding structure, slightly rotated from the building's orthogonal plan relative to San Vicente Boulevard, is located under the southeast corner. The interiors of the office suites are finished with wood flooring, plaster walls, and textured acoustical plaster ceilings.

The Barry Building was designated by the City as a Historic-Cultural Monument (HCM) No. 887 in 2007. The property is significant under the City's Cultural Heritage Ordinance Criterion 1, because it reflects "the broad cultural, political, economic or social history of the nation, state, or community." The building was the longtime home of Dutton's Brentwood Books and fostered a sense of cultural identity along the San Vicente commercial corridor in Brentwood. The Barry Building is also significant under City's Cultural Heritage Ordinance Criterion 3, because it "embodies the distinguishing characters of an architectural-type specimen, inherently valuable for a study of a period, style of method of construction," as an example of International Style architecture. The Barry Building is an example of Mid-century Modern commercial architecture in Los Angeles and embodies a distinctly local expression of the style. The period of significance for the context/theme/property type combination is 1945-1975. The Barry Building retains integrity of location, design, setting, materials, workmanship, and feeling. It is therefore eligible for listing in the National Register and the California Register. Details of the criteria, eligibility standards, character-defining features, and integrity considerations are provided in the Historical Resources Technical Report included as Appendix C-1 of the Draft EIR.

The Project would demolish the Barry Building and all those physical characteristics that convey its historical significance and that justify its designation as a City HCM, and its eligibility for listing in the California Register and the National Register. Thus, the Project would materially impair the significance of the Barry Building and would cause a substantial adverse change in the significance of an historical resource as defined by CEQA. Therefore, Project impacts related to historical resources would be significant and unavoidable.

As discussed in Section IV.B of the Draft EIR, cumulative impacts to historical resources would be less than significant. While the Project would demolish the Barry Building, resulting in a Project-specific significant and unavoidable impact, the Barry Building is not a contributor to any established historic district or HPOZ and does not contribute to the significance of any other individual historical resources.

Project Design Features

No specific project design features (PDFs) are proposed with regard to cultural resources.

Mitigation Measures

The following measure has been required for the Project:

MM-CUL-1 Prior to the issuance of a demolition permit, the Barry Building shall be documented to meet Historic American Buildings Survey (HABS) Level I standards. The documentation shall include a full set of measured drawings depicting existing conditions; photographs with large format negatives of exterior and interior views; photocopies with large format negatives of select existing drawings and historic views that are produced in accordance with the U.S. Copyright Act (as amended); and a written history and description. The documentation shall be submitted to the Library of Congress, with copies given to the Los Angeles Conservancy and the Los Angeles Public Library. A digital copy of the documentation shall be submitted to the South Central Coastal Information Center at California State University, Fullerton.

Finding

Specific economic, legal, social, technological, other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the EIR. (PRC Section 21081(a)(3))

Rationale for Finding

As discussed in Section II (Project Description) of the Draft EIR, the Project consists of the demolition of the Barry Building, which has been vacant and fenced off since 2017, and the installation of a landscape buffer along the southern boundary of the Project Site. The existing building is currently designated as a City of Los Angeles HCM. Adopting Mitigation Measure MM-CUL-1, which will document the existing building's historical significance, will not eliminate the Project's significant impacts to cultural resources, which are the result of demolition of an HCM. Therefore, as discussed in Draft EIR Section IV.B, the Project's impacts to cultural resources will be significant and unavoidable. Mitigation Measure MM-CUL-1, provided above, requires the Barry Building to be documented to meet HABS Level I standards prior to demolition. However, even after implementation of Mitigation Measure MM-CUL-1, Project impacts would remain significant and unavoidable as the Project would demolish the existing historical resource. Further, all feasible mitigation measures have been imposed on the Project, mitigation measures such as interpretive programs, incorporation of materials into a new building, or a commemorative plaque would not reduce impacts, provide additional benefits not otherwise provided by the HABS survey detailed above, or are impractical because no new development is proposed. Therefore, as the Project is demolition of a building with no new construction, all feasible mitigation measures have been imposed on the Project. Further, Alternatives 1, 2, and 3 of the Draft EIR studied alternatives to demolition that could potentially mitigate effects but were determined infeasible. In addition, relocation of the building is technically impractical and infeasible due to the size of the building and the logistical requirements to move the structure. Dismantling the building for relocation would pose a significant risk to the buildings character-defining features.

Reference

See Section IV.B and Section VI of the Draft EIR for complete analysis of the cultural resources impacts, thresholds, and evaluation methods conducted for the Project.

Land Use and Planning (conflict with plan or policy)

Impact Summary

The Project Site has a General Plan land use designation of Neighborhood Office Commercial and is zoned C4-1VL (Commercial Zone, Height District 1VL). The Commercial Zone permits a range of commercial uses including retail and office uses. Within Height District 1VL, the C4 zone allows for a building height maximum of up to 45 feet and establishes a floor area ratio (FAR) of 1.5:1.

As the Project would result in the demolition of an existing historical resource, the Project would conflict with the applicable objectives and policies in the City of Los Angeles General Plan - Conservation Element related to the preservation of historical resources. Therefore, the Project would result in a potentially significant impact with respect to consistency with the City of Los Angeles General Plan (Conservation Element).

The Project would also conflict with several of the applicable goals, objectives, and policies within the Brentwood – Pacific Palisades Community Plan that are related to the preservation of historical resources. See Section IV.D, Table IV.D-1 of the Draft EIR. Therefore, the Project would result in a potentially significant impact with respect to consistency with the Brentwood-Pacific Palisades Community Plan.

The Project would not result in any changes to the General Plan land use designation and zoning regulations applicable to the Project Site. However, the Project would conflict with the goals, objectives, and policies of the General Plan (Conservation Element) and the Brentwood-Pacific Palisades Community Plan related to historic preservation, which are the primary goals, objectives, and policies applicable to the Project since development of the Project Site is not proposed.

As described in Draft EIR Section IV.B, Cultural Resources, Mitigation Measure MM-CUL-1 would be undertaken by the Project Applicant, which requires the Barry Building to be fully documented prior to demolition.

Even with implementation of Mitigation Measure MM-CUL-1, the Project would conflict with the applicable land use goals, objectives, and policies as the Project would demolish the existing historical resource. Therefore, Project impacts related to land use and planning would remain significant and unavoidable.

Project Design Features

No specific project design features (PDFs) are proposed with regard to land use and planning.

Mitigation Measures

The Project would be required to implement MM-CUL-1, discussed above, which would mitigate impacts to cultural resources, and by extension applicable goals, objectives, and policies related to historic preservation.

Finding

Specific economic, legal, social, technological, other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the EIR. (PRC Section 21081(a)(3))

Rationale for Finding

As evaluated in Section IV.D of the Draft EIR, the Project would conflict with the applicable policies of the General Plan (Conservation Element) and the Brentwood-Pacific Palisades Community Plan related to historic preservation. Even with implementation of Mitigation Measure MM-CUL-1, the Project would continue to conflict with the applicable land use goals, objectives, and policies as the Project would demolish the existing historical resource. Therefore, Project impacts related to land use and planning would remain significant and unavoidable. However, there were no other mitigation measures identified in the EIR that avoid that significant impact. Further, Alternatives 1, 2, and 3 of the Draft EIR studied alternatives to demolition that could potentially mitigate effects but were determined infeasible. In addition, relocation of the building is technically impractical and infeasible due to the size of the building and the logistical requirements to move the structure. Dismantling the building for relocation would pose a significant risk to the buildings character-defining features.

Therefore, there are no feasible mitigation measures or alternatives that would reduce impacts to related to land use to less than significant.

Reference

See Draft EIR Sections IV.D and Section VI for complete analysis of the land use and planning impacts, thresholds, and evaluation methods conducted for the Project.

VIII. Alternatives

CEQA requires that an EIR analyze a reasonable range of feasible alternatives that could substantially reduce or avoid the significant impacts of a project while also meeting the project's basic objectives. An EIR must identify ways to substantially reduce or avoid the significant effects that a project may have on the environment (PRC Section 21002.1). Accordingly, the discussion of alternatives shall focus on alternatives to a project or its location which are capable of avoiding or substantially reducing any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly. The alternative analysis included in the Draft EIR, therefore, identified a reasonable range of project alternatives focused on avoiding or substantially reducing the project's significant impacts.

Summary of Findings

Based upon the following analysis, the City finds, pursuant to CEQA Guidelines Section 15091, that no feasible alternative or mitigation measure will substantially lessen any significant effect of the project, reduce the significant unavoidable impacts of the project to a level that is less than significant, or avoid any significant effect the project would have on the environment.

Project Objectives

The objectives of the Project are as follows:

1. Comply with the City's Soft Story Retrofit Program (LAMC Section 91.9300 et seq., Ordinance entitled Mandatory Earthquake Hazard Reduction in Existing Wood Frame Buildings with Soft, Weak or Open Front Walls), which includes complying with the requirements under LAMC Section 91.9305.2.

2. Abate the fire, loitering, vandalism, and other public safety hazards associated with structural defects and current vacancy of the Barry Building.

Alternatives Analyzed

Alternative 1 – No Project Alternative

Description of Alternative

CEQA requires the alternatives analysis to include a "no project" alternative, which is the circumstance under which the Project does not proceed. The purpose of analyzing a No Project Alternative is to allow decision makers to compare the impacts of approving the project with the impacts of not approving the project (CEQA Guidelines Section 15126.6, subd. (e)(1)).

This alternative assumes that the Project would not be implemented, and the existing building would not be demolished. However, in March 2018, the City of Los Angeles issued the Applicant an Order to Comply with the City's Soft Story Retrofit Program. (See LAMC Section 91.9305.2(1)(c), (2), and (3).) Thus, even under a "no project" alternative, some alternations to the Barry Building must be made. In a "no project" alternative where the building is not demolished, then it must be retrofitted to avoid penalties under the Soft Story Ordinance. However, Alternative 1 assumes only the minimum seismic retrofit work would be undertaken to comply with the Soft Story Ordinance, but no other seismic retrofit work would be undertaken and therefore the building would not be operational under this alternative.

Englekirk Structural Engineers prepared a technical report dated May 26, 2021 (included in Appendix H-2 of the Draft EIR) that included a structural analysis to repair the existing building to conform to the City's Soft Story Ordinance (see "Phase I" discussion in Appendix H-2). According to the Englekirk report, the south wing of the building that faces San Vicente Boulevard utilizes a pass-through at the ground floor that accesses the interior courtyard. As a result, there are no bearing walls that extend to the foundation and instead the second floor is supported on a series of isolated steel columns.

To comply with the City's Soft Story Retrofit Program, Englekirk developed a seismic retrofit scheme that consists of steel moment frame structures that are located within the building and are supported on new concrete footings. However, compliance with the retrofit required by the Soft Story Ordinance would not address structural deficiencies identified in the east, north, or west wing as provided in Englekirk's Seismic Assessment (see Appendix H-3 and Appendix G of the Draft EIR).

Therefore, if the remaining building wings are not structurally retrofitted, the work to the south wing of the building would not be sufficient to protect building occupants if the building was subject to a moderate to severe seismic event. In addition, the south wing alone, which is on the second story of the building, could not be occupied as occupants would need to take one of two stairways and travel along other wings of the building that have not been retrofitted in order to reach the south wing. As such, the building could not be safely occupied under Alternative 1. This alternative would not address the building's other areas of noncompliance, specifically under the ADA and the Building Code.

Impact Summary

All of Alternative 1's impacts would be less than significant, including with respect to historical resources and land use. The Project would result in a significant and unavoidable impact with respect to historical resources and land use, as the Project would demolish the existing building, which is City HCM No. 887. As Alternative 1 involves the retention of the existing building, Alternative 1 would result in similar impacts as the Project related to Air Quality, Greenhouse Gas

Emissions, Noise, Transportation, Tribal Cultural Resources, and would avoid the Project's significant and unavoidable impacts with respect to Cultural Resources (historical resources) and Land Use and Planning (conflict with plans).

Finding

Specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the environmental impact report. (PRC 21081(a)(3).)

Rationale for Finding

As discussed above, Alternative 1 involves the retention of the existing building, with minor seismic retrofitting, resulting in a structure that would be unsuitable for full occupation. Alternative 1 would avoid the significant impacts related to historical resources and land use. However, as discussed in Englekirk Structural Engineers technical report dated May 26, 2021, with the seismic retrofitting to comply with the requirements of the City's Soft Story Retrofit Program, the building would still present a seismic risk and safety hazard and could not be occupied. This is because the structural retrofit required by the Soft Story Ordinance only addresses the structural deficiencies in the south wing, and does not address the east, north, or west wing structural deficiencies. Further, the building would not meet ADA requirements for accessibility, further limiting its suitability for occupation. As discussed above, the alternative is not feasible because, even with compliance with the Soft Story Retrofit requirements, structural issues would remain, precluding occupation of much of the building and a reasonable return on investment, while persisting as a safety hazard. The structural condition of the building, combined with lack of ADA compliance would present both economic and legal complications for the owner, as failure to comply with ADA regulations could result in legal and economic penalties were the building to be occupied. Feasibility is defined by PRC Section 15364 as "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors." As discussed above, specific economic, legal, technical, and social limitations make the alternative infeasible.

Per the CEQA Guidelines Section 15126.6 (a), reasonable project alternatives are those that "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, and evaluate the comparative merits of the alternatives." Accordingly, while this alternative would partially meet the first Project objective, this Alternative is still infeasible because it would not resolve the public safety consideration associated with a moderate to severe earthquake event. In such an event, there would still be a significant risk to public safety because of the structural deficiencies in the building wings not subject to the Soft Story Ordinance. Further, given that the building would remain unoccupied under this alternative, the property would remain vacant and therefore, would not meet the second Project objective. Therefore, this alternative would not meet most of the project objectives.

Therefore, per PRC Section 15364 and based on the above specific economic, legal, social and technical reasons Alternative 1 would be infeasible.

Reference

See Draft EIR Section V for complete analysis of alternatives evaluated for the Project.

Alternative 2 – Preservation Alternative

Description of Alternative

Alternative 2, the Preservation Alternative would involve the work required to comply with the City's Soft Story Ordinance (as with Alternative 1), in addition to a voluntary seismic retrofit on the remainder of the building, and renovations to ensure compliance with the ADA, building code, and energy efficiency upgrades of the existing building.

The voluntary seismic retrofit program proposed by Englekirk Structural Engineers (see "Phase II" discussion in the technical report contained in Appendix H-2 of the Draft EIR) would include strengthening existing walls, adding new two-story shear walls, adding new floor and roof diaphragm sheathing, and adding new steel moment frames.

In addition, various physical aspects of the building are not in compliance with the ADA and California Building Code provisions related to access to buildings and properties for people with disabilities (Title 24, Part 2, Vol. 2, Chapter 11B). These issues are detailed in the ADA Upgrade Report prepared by Gruen Associates, included in Appendix H-5 of the Draft EIR. Accordingly, in addition to the voluntary seismic retrofit described above, Alternative 2 would also include an ADA upgrade, which would include upgrades related to an accessible path of travel, plumbing, stairs and balcony railing, vertical transportation, and tenant space improvements. Finally, certain aspects of the building do not meet California Building Code requirements. Therefore, Alternative 2 includes the following work to bring the building into compliance with the Code and other energy efficiency requirements.

Upon completion of the voluntary seismic retrofit, and ADA, building code, and energy efficiency upgrades, the building could be re-occupied by approximately 12,800 square feet of retail uses.

In the analysis provided below, asbestos abatement activities, which would take place prior to all other work, are anticipated to last two weeks. Performing the additional preservation measures is estimated to take approximately six months. Finishing activities, such as paving and applying new architectural coatings to the Barry Building, would take approximately one week each.

Impact Summary

As Alternative 2 involves the preservation of the existing building, Alternative 2 would avoid the Project's significant and unavoidable impacts with respect to historical resources and land use. However, as Alternative 2 includes an operational component (the re-occupancy of the building), Alternative 2 would result in greater impacts than the Project with respect to air quality, greenhouse gas emissions, noise, and traffic, although these impacts would still be less than significant.

While the additional construction would not result in exceedances of significance thresholds because there is no demolition activity under this Alternative, to further minimize Alternative 2's construction-related noise increases at 11900 Saltair Terrace and other sensitive receptors, the Draft EIR identified the following mitigation measure:

ALT2 MM-1 Sound barriers rated to achieve a sound attenuation of at least 15 dBA shall be erected along the following boundaries:

- The east and west parking area boundaries (both the Project Site's east and west parking area boundaries and the east and west boundaries of the parcel immediately to the north of the Project Site (APN 4404-025-016)). (While the parcel to the north of the Project Site is not part of either the Project or Alternative 2, that parcel would be used for construction staging.)

- The northern property line of the parcel to the north of the Project Site (APN 4404-025-016) that separates this parcel from the residential uses to the north. Sound barriers along this property line shall be connected to the sound barriers described for the east and west property lines, so that all of Alternative 2's construction areas are fully enclosed by sound barriers.

The sound barriers shall be tall enough to shield line of sight paths from operating construction equipment to the 2nd stories of nearby residential uses. The prescribed sound barriers shall be installed for the duration of Alternative 2's construction activities.

Finding

Specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the environmental impact report. (PRC 21081(a)(3))

Rationale for Finding

Alternative 2 would meet both of the Project objectives. However, studies provided by the Applicant demonstrate that Alternative 2 is economically infeasible.

This alternative would include compliance with the Soft Story Ordinance, additional seismic renovations, ADA upgrades and building code compliance to prepare the building for occupancy.

An economic analysis (hereafter "Initial Renovation Cost Analysis") was conducted and submitted to the record on April 20, 2023, by the Applicant. The analysis attached the following reports:

- *11971 San Vicente Boulevard – Retrofit Schemes* by Englekirk Structural Engineers (June 2021) (Soft Story Retrofit Letter Report) (Attachment A);
- *11971 San Vicente Boulevard – Retrofit Schemes* by Englekirk Structural Engineers (June 2022) (Attachment B);
- *11973 San Vicente Boulevard, ASCE 41-13 Seismic Assessment* by Englekirk Structural Engineers (June 2022) (Attachment C);
- *Prcject Impacts Assessment, 11973 San Vicente Boulevard* by Historic Resources Group (October 2022) (Attachment D);
- *Barry Building ADA Update Requirements* by Gruen Associates (June 2021) (Attachment E);
- *Barry Building Renovations* by Hill International (November 2022) (Attachment F); and
- *Barry Building Land Residual Analysis* by CBRE, Inc. (March 2023) (Pro forma) (Attachment G)

In addition, updated economic analysis (hereafter "Additional Cost Analysis") was provided by the Applicant on July 15, 2024. Additional reports attached to this analysis included:

- *Revised Cost Estimate*, Hill International (June 27, 2024) (Attachment H to the Additional Cost Analysis); and
- *Revised Revenue Analysis*, CBRE, Inc. (July 2024) (Attachment I to the Additional Cost Analysis)

In November 2024, the Applicant provided additional economic analysis to the City (hereafter "Updated Cost Analysis"), including:

- *Barry Building Retrofit Scope Costs*, Hill International (October 3, 2024)
- *Barry Building Proposed Retrofit*, Englekirk Structural Engineers (September 9, 2004)
- *Barry Building – Opinion of Probable Retrofit Cost*, Hill International (November 6, 2024)
- *Appraisal Report*, CBRE, Inc. (November 8, 2024)

The Initial Renovation Cost Analysis is included in the Administrative Record. (See Letter from E. Casey to J. Harris, RE: *11973 San Vicente Boulevard Prcject / ENV-2019-6645-EIR / State Clearinghouse No. 2020110210* (April 20, 2023).) The Additional Cost Analysis was provided to the Office of Historic Resources, in a letter from E. Casey dated July 15, 2024. (See Letter from E. Casey to K. Bernstein, *RE: 11973 San Vicente Boulevard Prcject / ENV-2019-6645-EIR / State Clearinghouse No. 2020110210 ("Barry Building')* (July 15, 2024).) The Updated Cost Analysis was provided to the City on November 14, 2024. (See Letter from E. Casey to J. McCrea, *RE: 11973 San Vicente Boulevard Prcject / ENV-2019-6645-EIR / State Clearinghouse No. 2020110210* (November 14, 2024).) These analyses and related attachments are the entirety of the materials in the administrative record evaluating the economic feasibility of the Project Alternatives.

Collectively, the above-referenced reports found that a large number of modifications are required to renovate the Barry Building to meet minimum standards for safety and accessibility. In addition to the retrofits required under the Soft Story Ordinance, a seismic assessment (Attachment C to the Initial Renovation Cost Analysis and included as Appendix G to the Draft EIR) found that the building's the north, east, and west wings currently range from being 190-percent to 650-percent overstressed, and further recommended additional renovations to make the building seismically sound. In addition to seismic upgrades, the necessary upgrades for compliance with the ADA and building code were identified. (See Attachment E to the Initial Renovation Cost Analysis and included as Appendix H-5 to the Draft EIR).

Attachment F to the Initial Renovation Cost Analysis contains a Cost Report Regarding Barry Building Renovations, prepared by Hill International on November 2, 2022. Hill International estimated the cost of the each of the renovations identified to make the building suitable for occupancy, and estimated a total cost for the work. The cost of these renovations was approximately $12,818,000 as of November 2022.

In addition, a pro forma revenue analysis completed by CBRE in March 2023 analyzed the expected value of the land and rental income based on the real estate market and the costs to complete necessary renovations to determine the maximum revenue that would be generated from a rehabilitated Barry Building. (See Attachment G to the Initial Renovation Cost Analysis.)

CBRE evaluated Alternative 2 of the Draft EIR (the "Preservation Alternative"), including seismic retrofitting of the existing Barry Building, the ADA upgrades, and Building Code compliance renovations identified in the Hill International Report (discussed above). This alternative estimates a total of an approximate 12,800 square feet of retail uses (and includes some common areas like bathrooms). In addition to the $12,818,000 estimated cost to complete necessary renovations

(per Hill International, discussed above), leasing commissions, costs for improvements to the leased spaces ("Tenant Improvement Allowance"), transfer taxes and developer profit were considered. According to CBRE's analysis dated March 2023 (provided by the Applicant in April 2023) the total combined costs of Alternative 2 are estimated at $17,024,961.

CBRE determined that under the assumptions of Alternative 2, the annual gross rental income for the retrofitted Barry Building is estimated at approximately $736,960; the total value of the retrofitted Building is $11,361,308. (See Attachment G to the Initial Renovation Cost Analysis.)

Thus, CBRE concluded that to preserve the Barry Building per Alternative 2, the residual land value would be $11,361,308 minus $17,024,961, or negative $5,663,653. CBRE found that the proposed project alternative returns a negative valuation. That is, the total costs of the necessary renovations and preparing the Barry Building for lease are estimated to be greater than the value of the renovated property.

The Applicant provided additional analyses to the City in July 2024 which identified changes in the costs associated with Alternative 2. Hill International revised its analysis in June 2024 and determined that the cost to complete the rehabilitation work as of June 2024 had risen to approximately $17.1 million. (See Attachment H to the Additional Cost Analysis.) Hill International's revised analysis determined that from June 1, 2021, to June 26, 2024, the cost per square foot for this renovation work rose from $777 to $1,108. According to Hill International's analysis, this escalation is primarily driven by higher labor costs, increased material prices, and rising transportation and disposal fees.

CBRE's 2023 analysis previously provided by the Applicant was based on an income approach that could be derived from the Owner leasing space in the rehabilitated building. In July 2024, the Applicant also commissioned a 2024 Appraisal Report by CBRE based on a sales approach. This analysis was provided as Attachment I to the Additional Cost Analysis. CBRE 2024's report determined that the Barry Building Property, assuming rehabilitation of the existing building, has no market value and may even have a negative value of $5,672,747.

In addition to the economic analysis prepared by the Applicant evaluating Alternatives 2 and 3, the Applicant has also evaluated the economic feasibility of completing only the minimum rehabilitation required for compliance with the Soft Story Ordinance and the California Historic Building Code. In November 2024, the Applicant provided the following analyses to the City related to this proposed scenario as part of the Updated Cost Analysis:

- Barry Building Proposed Retrofit, Englekirk Structural Engineers (September 9, 2004)
- Barry Building Retrofit Scope Costs, Hill International (October 3, 2024)
- Barry Building – Opinion of Probable Retrofit Cost, Hill International (November 6, 2024)
- Appraisal Report, CBRE (November 8, 2024)

This scenario specifically accounts for the allowance per Section 8-706 of the California Historic Building Code for an historic building retrofit to meet only 75% of the current Building Code. The Applicant provided a Seismic Assessment prepared by Englekirk Structural Engineers identifying the work required under this more limited scope seismic retrofit work (the "75% Seismic Retrofit").

The required rehabilitation identified by Englekirk includes: reinforcing shear walls; adding plywood at floors and roof; adding or enlarging existing footings. (See Barry Building Proposed Retrofit, Englekirk Structural Engineers, September 9, 2004.)

The Applicant also provided an analysis of the costs associated with this narrowed scope of work under the 75% Seismic Retrofit scenario as compared to Alternative 2. An estimate prepared by Hill International excluded work previously considered within Alternative 2. (See Barry Building – Opinion of Probable Retrofit Cost, Hill International, November 6, 2024.) After reducing the June 27, 2024, cost estimate developed by Hill International (Attachment H to the Additional Cost Analysis) and accounting for the increase in construction costs due to the annualized inflation rate of 6.8%, Hill International determined that the cost to rehabilitate the Barry Building under this more limited scope of rehabilitation work is approximately $15,438,389. (See Barry Building Retrofit Scope Costs, Hill International, October 3, 2024.)

CBRE prepared an appraisal report for the Applicant considering the value of the rehabilitated Barry Building, complying with the California Historic Building Code per this scenario. CBRE compared similar recently sold properties and found that the price per square foot ranged from approximately $469 to $1,045. Excluding high and low extremes, CBRE determined the average price per square foot of comparable properties is approximately $630. CBRE used Hill's cost analysis of the minimum rehabilitation work required ($15,438,389) and reduced it by 20% to assume availability of a 20% rehabilitation tax credit. This assumption resulted in CBRE's estimate of cost to renovate the property at approximately $865 per square foot. This reduced cost is conservatively low as it does not include any indirect costs (which CBRE estimates could add 10-20%). CBRE's estimated cost of rehabilitation of $865 per square foot significantly exceeds the market price of the renovated property at $630 per square foot.

Based on the assumptions provided, CBRE determined that the resulting value of rehabilitating the Barry Building is approximately negative $3 million (excluding indirect costs). As a result, CBRE determined that the property has no (or negative) market value. (See Appraisal Report, CBRE, November 8, 2024.)

Alternative 2 would reduce or avoid the Projects impacts to Cultural Resources and Land Use but would result in greater impacts with respect to air quality, greenhouse gas emissions, noise, and traffic, as a result of an operational component, although these impacts would still be less than significant. Feasibility is defined by PRC Section 15364 as "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors." Although Alternative 2 would meet the Project objectives, and reduce some environmental impacts, substantial evidence in the administrative record submitted by the Applicant demonstrates that Alternative 2 would be economically infeasible.

Reference

See Draft EIR Section V for complete analysis of alternatives evaluated for the Project. See Appendices H-2, H-3, H-4, H-5, H-6, H-7 and G; Letter from E. Casey to J. Harris, RE: *11973 San Vicente Boulevard Prcject / ENV-2019-6645-EIR / State Clearinghouse No. 2020110210* (April

20, 2023) ("Initial Renovation Cost Analysis") and attachments; Letter from E. Casey to K. Bernstein (July 15, 2024) ("Additional Cost Analysis") and attachments; and Letter from E. Casey to J. McCrea, *RE: 11973 San Vicente Boulevard Prcject / ENV-2019-6645-EIR / State Clearinghouse No. 2020110210* (November 14, 2024) ("Updated Cost Analysis") and attachments.

Alternative 3 – Partial Preservation with New Construction Alternative

Description of Alternative

Alternative 3 includes the partial preservation of the existing building with new construction on the remaining portion of the Project Site. Specifically, Alternative 3 would preserve the south, east, and west wings of the building, the courtyard, and the south façade of the north wing. However, Alternative 3 would involve demolition of the building volume behind the south façade of the north wing. Alternative 3 would also include the work required to comply with the City's Soft Story Ordinance, as well as the voluntary seismic retrofit (see Appendix H-2 of the Draft EIR for a discussion of the work required to comply with the Soft Story Ordinance and the voluntary seismic retrofit), and ADA (see Appendix H-5 of the Draft EIR for a discussion of work need to comply with ADA requirements), building code, and energy efficiency upgrades, as described above for Alternative 2, to the preserved portion of the existing building.

In addition, Alternative 3 would include the construction of a new building behind the existing building (referred to as the "Annex"). The new building would be approximately 10,815 square feet in three stories (approximately 3,605 square feet per level). In total, Alternative 3 would include approximately 19,771 square feet of office and retail uses, consisting of 8,956 square feet of retail uses in the existing building and 10,815 square feet of office uses in the new building.

This work would be performed over an approximate seven-month period. Asbestos abatement activities, which would take place prior to all other work, are anticipated to last two weeks. Performing the additional preservation measures, as well as constructing the new office building, is estimated to take approximately seven months. Finishing activities, such as paving and application of architectural coatings, would take approximately one week each.

Impact Summary

As Alternative 3 involves the partial preservation of the existing building, Alternative 3 would avoid the Project's significant and unavoidable impacts with respect to historical resources and land use. However, as Alternative 3 involves the construction of a new building and also includes an operational component (the re-occupancy of the preserved portion of the existing building with retail uses and a new building with new office uses), Alternative 3 would result in greater impacts than the Project with respect to air quality, greenhouse gas emissions, noise, and traffic, although these impacts would still be less than significant.

Demolition of the Barry Building's north wing and grading for the proposed office building could result in substantial noise increases at nearby sensitive receptors. The resultant noise increase at the nearest sensitive receptor would be 12.5 dBA, which is above the City's significance threshold of 5 dBA. Without mitigation, this impact would be considered potentially significant. As a result, the following mitigation measure is required for Alternative 3:

> **ALT3 MM-1** Sound barriers rated to achieve a sound attenuation of at least 15 dBA shall be erected along the following boundaries:

- The east and west parking area boundaries (both the Project Site's east and west parking area boundaries and the east and west boundaries of the parcel immediately to the north of the Project Site (APN 4404-025-016)). (While the parcel to the north of the Project Site is not part of either the Project or Alternative 3, that parcel would be used for construction staging.)
- The northern property line of the parcel to the north of the Project Site (APN 4404-025-016) that separates this parcel from the residential uses to the north. Sound barriers along this property line shall be connected to the sound barriers described for the east and west property lines, so that all of Alternative 3's construction areas are fully enclosed by sound barriers.
- The sound barriers shall be tall enough to shield line of sight paths from operating paving equipment to the 2nd stories of nearby residential uses. The prescribed sound barriers shall be installed for the duration of Alternative 3's construction activities.

Finding

Specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the environmental impact report. (PRC 21081(a)(3))

Rationale for Finding

Alternative 3 would meet both of the Project objectives. However, studies provided by the Applicant demonstrate that it is economically infeasible.

The Initial Renovation Cost Analysis submitted to the record on April 20, 2023, by the Applicant (and identified above) considered the economic feasibility of Alternative 3. As with Alternative 2, CBRE prepared a pro forma valuation based on Alternative 3 of the Draft EIR (the "Partial Preservation with New Construction Alternative") which would involve renovation and preservation of approximately 70 percent of the existing Building and construction of additional commercial space on the remaining portion of the Project Site. Alternative 3 would involve demolition of the building volume behind the south façade of the north wing to accommodate the construction of an additional 10,815 square feet of commercial space (three stories high). In total, Alternative 3 would include approximately 19,771 square feet of office and retail uses. Alternative 3 results in the most leasable space in the renovated building of the alternatives identified.

Alternative 3 includes seismic retrofitting, ADA upgrades, Building Code compliance, and energy efficiency upgrades. As provided by the Applicant, Hill International prepared an analysis of the cost of completing this work as of November 2022. (See Attachment F to the Initial Renovation Cost Analysis.) CRBE considered the cost estimate prepared by Hill International and determined that the total cost of renovations, demolition, and construction of the additional annex was estimated at $19,646,307 as of March 2023. (See Attachment G to the Initial Renovation Cost Analysis.)

CBRE's 2023 analysis of the assumptions of Alternative 3, estimated the annual gross rental income for the retrofitted Barry Building at approximately $1,049,100, and the total value of the property at completion is $15,912,339. (See Attachment G to the Initial Renovation Cost Analysis.)

CBRE's 2023 analysis determined that to preserve the Barry Building per Alternative 3, the residual land value is $15,912,339 minus $19,646,307, or negative $3,733,908. (See Initial Renovation Cost Analysis.) CBRE found that this proposed project alternative returns a negative valuation. That is, CBRE calculated that the total costs of the necessary renovations and preparing the Barry Building per Alternative 3 for lease are estimated to be greater than the value of the renovated property. Although Alternative 3 offers the highest possible revenue for the preserved Barry Building by expanding leasable space of the Alternatives, CBRE's cost analysis found total costs of the necessary renovations and retrofitting to prepare the Barry Building for lease pursuant to Alternative 3 are greater than the value of the renovated property.

CBRE's 2023 analysis did not consider the potential availability of a 20 percent tax credit for the rehabilitation work[3] or the narrower scope of work available under the 75% Seismic Retrofit Scenario per the Historic Building Code,[4] which would call for 8,956 square feet of the building to be preserved under this Alternative. However, since CBRE prepared their analysis, Hill International identified that construction costs have risen significantly. According to Hill International's analysis, this escalation is primarily driven by higher labor costs, increased material prices, and rising transportation and disposal fees. (See Attachment H to the Additional Cost Analysis.) Hill International's June 2024 report notes that construction costs have risen by approximately 42.5 percent since their initial report was produced. In November, Hill International noted that construction costs have continued to rise. (See Attachment H to the Additional Cost Analysis; see also Updated Cost Analysis.) The Applicant determined that while these factors considered cumulatively would decrease the costs associated with construction under this Alternative by approximately $500,000, the reduction in costs available from the tax credit and the Historic Building Code were not sufficient to offset the negative $3,733,908 valuation identified by CBRE in 2023 in light of the significant increase in construction costs

CBRE and Hill International's analyses found that even with the additional commercial space included in Alternative 3, the sale price per square foot (approximately $630) is less than the cost per square foot of the necessary construction work ($970-$1,270 per Hill International's 2024 report) such that the additional construction required under Alternative 3 would not alter CBRE's finding of a negative valuation of the renovated property.

Alternative 3 would meet the Project objectives, avoid the Project's significant and unavoidable impacts to Cultural Resources and Land Use, while resulting in greater than the Project but still less than significant impacts with respect to air quality, greenhouse gas emissions, noise, and traffic. Feasibility is defined by PRC Section 15364 as "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors." Based on substantial evidence in the administrative record submitted by the Applicant, Alternative 3 would be economically infeasible.

Reference

See Draft EIR Section V for complete analysis of alternatives evaluated for the Project. See Appendices H-2, H-3, H-8, H-9, H-10, H-11 and G; Letter from E. Casey to J. Harris, RE: *11973 San Vicente Boulevard Prcject / ENV-2019-6645-EIR / State Clearinghouse No. 2020110210*

[3] This 20% tax credit under I.R.C. Treasury Regulations is discussed and considered in CBRE's 2024 analysis. (See Attachment I to the Additional Cost Analysis.)

[4] See also findings for Alternative 2 concerning the 75% Seismic Retrofit allowed under the Historic Building Code.

(April 20, 2023) and attachments; and Letter from E. Casey to K. Bernstein (July 15, 2024) ("Additional Cost Analysis") and attachments.

Alternative 4 – Relocation Alternative

Description of Alternative

Alternative 4 involves the dismantling of the Barry Building into multiple small building portions to facilitate its relocation to a new site, which has yet to be determined. At the new location, the Barry Building would be reconstructed, which would incorporate additional preservation measures relating to seismic retrofitting, ADA updates, building code updates, and energy efficiency upgrading that were described previously for Alternative 2. Once the Barry Building has been moved and rehabilitated, this analysis assumes that the Barry Building would be occupied by 12,800 square feet of retail uses.

HKA prepared a report analyzing four options to move the existing building to another site (see Appendix H-12 of the Draft EIR for this report), which are described below:

Option 1: Relocate virtually all building elements intact in one piece. This option was determined to be infeasible from a structural moving perspective, as the logistical challenges are extremely high. Besides undercutting beneath the building and then supporting the entire building while on the Project Site, it is infeasible to move the intact building in one piece once it is on City streets because of its size, particularly the building's width. Maneuverability would be infeasible to make turns from one street to another and due to the physical challenges (street trees, traffic signals, overhead wires, etc.) that would be encountered during the move. Therefore, HKA determined that Option 1 is infeasible due to these logistical challenges.

Option 2: This option considers partially dismantling the building elements into six parts at strategic vertical locations resulting in multiple two-story building portions which would be moved individually. This option proposes separating the north and the south two-story building elements from the connecting west and east two-story elements. This option also suggests removing, cataloging, and crating exterior stair elements, applied architectural features, such as aluminum sun-control fins, and applied architectural fixed-in-place wooden sun-control and ornamental architectural features. However, this option would present a number of transportation challenges. Even partially dismantled, the length of the building segments would make the transporting maneuverability infeasible at turns from one street to another street along the path from San Vicente Boulevard to a presently undetermined property. The overall height would also make this option infeasible for the same reasons as described for Option 1 (inability to clear street landscaping, utilities, street lighting, and traffic signals). Therefore, HKA determined that Option 2 is infeasible due to these logistical challenges.

Option 3: This option proposes partially dismantling the building elements at strategic horizontal locations into nine total pieces, thereby achieving multiple one-story building portions. In addition, strategic vertical separations would also be necessary to keep the overall length for each building element respectful to the architectural massing. Since the structure would be separated at a point above the second-floor plane but below the historic windows, the structure must be stabilized temporarily (addition of wood and steel beams, vertical and diagonal braces, diaphragms, and temporary floor construction to take place of the floor which will remain as part of the first story) to protect the construction from excessive movement during the relocation trip. This option also entails removing, cataloging, and crating exterior stair elements, applied architectural features, such as aluminum sun-control fins, and applied architectural fixed-in-place wooden sun-control

and ornamental architectural features. This option also presents a number of transportation moving challenges, as the overall length of the building elements would remain a challenge, which would make the transporting maneuverability difficult at turns from one street to another street along the path from San Vicente Boulevard to a presently undetermined property. The overall height may be less of a challenge with respect to clearance of street landscaping, utilities, street lighting, and traffic signals since the singular floor height would be substantially less than the building's two-story height. The work required under Option 3 would be performed over approximately 14-18 months. HKA identified that this option presents significant architectural destruction and damage when separating the building into portions for moving. Separating the two-story building would cause damage to the architectural exterior veneer plaster at the horizontal and vertical separations. As the overall building is separated into strategic portions to facilitate structural relocation, more and more damage and restoration will be required. HKA noted that restoring the veneer plaster at the separation locations would require feathering the plaster between the old and the new and/or installing screeds as plaster stops and expansion joints. This would result in significant degradation to the historic fabric of the building's exterior and to the character defining features.

Option 4: This portion proposes partially dismantling the building elements at strategic horizontal and vertical locations into 20 pieces achieving multiple small building portions. This option also entails removing, cataloging, and crating exterior stair elements, applied architectural features, such as aluminum sun-control fins, and applied architectural fixed-in-place wooden sun-control and ornamental architectural features. This option presents fewer transportation moving challenges and would make the transporting maneuverability somewhat easier at turns from one street to another street along the path from San Vicente Boulevard to a presently undetermined property. The overall height would likely be less of a challenge, for clearance of street landscaping, utilities, street lighting, traffic signals, and overhead power/telephone/cable lines since the singular floor height would be substantially less than an option where the building remains at two stories during the relocation. This option presents a temporary construction challenge (addition of wood and steel beams, vertical and diagonal braces, diaphragms, and temporary floor construction to take place of the floor which will remain as part of the first story) as previously discussed for Option 3, but this challenge is much more significant for Option 4, as a substantial amount of structure must be added to stabilize portions of the building temporarily to protect the building from excessive movement during the relocation trip. The work required under Option 4 would be performed over approximately 16-20 months.

As Options 1 and 2 were determined to be infeasible, the Draft EIR (Section V) addresses only Options 3 and 4 from the HKA report in detail. This analysis assumes that asbestos abatement activities, which would take place prior to all other work, are anticipated to last two weeks. Following this, preparing the Barry Building for dismantling and transporting would involve removing exterior elements and other ornamental features, as well as adding temporary stabilizing structures to portions of the building that would be transported. This is estimated to take approximately two months.

Reconstruction of the building would incorporate additional preservation measures relating to seismic retrofitting, ADA updates, building code updates, and energy efficiency upgrading. The differences between Option 3 and Option 4 chiefly concern whether the Barry Building would be dismantled into 9 or 20 pieces.

Reassembling the Barry Building and performing the additional preservation measures is estimated to take approximately 15 months. While a relocation site has not yet been identified, according to Historic Resources Group (see Appendix H-13 of the Draft EIR), the new site would have to be located on a similar commercial thoroughfare and have a similar flat topography as the Project Site. However, there is no limit to the distance from the old site to the new site within the City of Los Angeles, other than those limits imposed by physical and economic feasibility.

Impact Summary

All of Alternative 4's impacts would be less than significant, including with respect to historical resources (with mitigation) and land use. The Project would result in significant and unavoidable impacts with respect to historical resources and land use, as the Project would demolish the existing building, which is City HCM No. 887. As Alternative 4 involves the relocation of the existing building, Alternative 4 would avoid the Project's significant and unavoidable impacts with respect to historical resources and land use, with implementation of Mitigation Measure ALT4 MM-1 with respect to historical resources, as well as inclusion of the recommendations provided by Historic Resources Group (Appendix H-7 of the Draft EIR).

ALT4 MM-1 Potential mitigation measures to reduce the risks associated with disassembly of the Barry Building could include, but not necessarily be limited to, the following:

- Historic American Buildings Survey (HABS) documentation including photographs, drawings, and narrative, completed prior to the issuance of permits.
- Preparation of an Historic Structure Report (HSR) in conformance with Preservation Brief 43 prior to the issuance of permits, to document existing features, evaluate conditions, and recommend appropriate treatments.
- Preparation of a Relocation and Rehabilitation Plan, to be reviewed and approved by the City of Los Angeles Office of Historic Resources (OHR) prior to the issuance of any permits.
- Selection of a new site that meets the requirements of Criteria Consideration B as outlined in National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation.
- Inclusion of an historic architect on the Project team to monitor disassembly, relocation, and rehabilitation activities.
- Rehabilitation of the relocated Barry Building in conformance with the Secretary of the Interior's Standards for Rehabilitation (36 CFR 67) including replication of the historic cement plaster and reinstallation of salvaged architectural features.

However, Alternative 4 would be required to implement mitigation measures (Mitigation Measures ALT4 MM-2 through ALT4 MM-5) related to construction noise and vibration to ensure that that these impacts are less than significant at both the Project Site and the potential relocation site.

ALT4 MM-2 Sound barriers rated to achieve a sound attenuation of at least 15 dBA shall be erected along the following boundaries:

- The east and west parking area boundaries (both the Project Site's east and west parking area boundaries and the east and west boundaries of the parcel immediately to the north of the Project Site (APN 4404-025-016)). (While the parcel to the north of the Project Site is not part of either the Project or Alternative 4, that parcel would be used for construction staging.)
- The northern property line of the parcel to the north of the Project Site (APN 4404-025-016) that separates this parcel from the residential uses to the north. Sound barriers along this property line shall be connected to the sound barriers described

for the east and west property lines, so that all of Alternative 4's construction staging areas are fully enclosed by sound barriers.

The sound barriers shall be tall enough to shield line of sight paths from operating construction equipment to the 2nd stories of nearby residential uses. The prescribed sound barriers shall be installed for the duration of Alternative 4's relocation preparation and utilities removal phases.

ALT4 MM-3 Sound barriers rated to achieve a sound attenuation of at least 15 dBA shall be erected along perimeters of the future relocation site facing noise-sensitive receptors that are located less than 300 feet from the future relocation site. The sound barriers shall be tall enough to shield line of sight paths from operating construction equipment to any above-ground stories that these receptors may possess. The sound barriers shall be installed for the duration of Alternative 4's relocation preparation activities (including trenching for utility connections and grading for foundations), Barry Building reassembly and preservation activities, and any paving.

ALT4 MM-4 The Barry Building shall not be relocated to a future site that would require heavy-duty, steel-tracked construction equipment (or the vibrational equivalent thereof) to operate within 15 feet of structures that meet FTA Category III conditions or within 20 feet of structures that meet FTA Category IV conditions.

ALT4 MM-5 The Barry Building shall not be relocated to a future site that would require heavy-duty, steel-tracked construction equipment (or the vibrational equivalent thereof) to operate within 85 feet of residential land uses.

Finally, as Alternative 4 involves an operational component (the re-occupancy of the relocated Barry Building), Alternative 4 would result in greater impacts than the Project with respect to air quality, greenhouse gas emissions, noise, and traffic, although these impacts would still be less than significant.

Finding

Specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the environmental impact report. (PRC 21081(a)(3).)

Rationale for Finding

Within Alternative 4, four different options for relocation were identified by HKA Global Inc. (See Attachment H-12 to the Draft EIR.) Options 1 and 2 are technically infeasible. Options 3 and 4 are economically infeasible and are still likely to result in significant damage to the historical character of the Barry Building. All four options would require a relocation site, which has not been identified and may not be available. (See Attachment H-13 to the Draft EIR.)

The ability of Alternative 4 to meet the Project objectives depends on finding a new site for the Barry Building, which has not occurred, and the EIR could not include an analysis as to the feasibility of finding a new site without engaging in speculation.[5] However, assuming a new site

[5] As noted in Appendix h-13 to the Draft EIR, the new site would have to be located within the Los Angeles city limits, be located on a similar commercial thoroughfare and have a similar flat topography.

could be identified, the analysis provided in the EIR demonstrates that Alternative 4 may be able to meet both of the Project objectives, subject to economic factors, which were not addressed in the EIR.

HKA Global, Inc. provided an analysis to evaluate, and report on the feasibility of Alternative 4 of relocating the existing Barry Building to an off-site location while respecting and maintaining the historical "character defining features" of the building and its siting features. (See Appendix H-12 to the Draft EIR.) Options 1 and 2 as explained above were determined to be categorically infeasible due to street loading capacities and width limitations and maneuvering challenges (turning from one street to another).

Option 3 proposes partially dismantling the building elements at strategic horizontal locations into 9 total pieces. As noted in HKA's report, Option 3 presents significant logistical challenges, and also presents high risks to the historical character of the Barry Building. HKA determined that this option, while technically possible, would likely damage and destroy character defining features which will be difficult to restore, eliminating the benefit of preserving the historic characteristics of the building through relocation.

Option 4 would dismantle the building into 20 segments. While this option is technically feasible, HKA determined that it would be costly, and that the risks associated with the relocation and reassembly are high. This option presents the greatest risk to architectural and historical feature integrity of the building and the building's character defining features making this option least undesirable historical risk option if the desired effect is to protect the architectural integrity of the building.

Neither Option 3 or 4 is a practical option to meet the project's first objective, as both options would destroy character defining features and would present very high risks to the integrity of the building that could result in a significant adverse impact as defined by CEQA. (See Appendix H-12 and H-16.) However, even if the adverse impacts could be mitigated to a less than significant impact as outlined by HRG in Appendix H-16 to the Draft EIR, and assuming a suitable new site exists and can be obtained, Options 3 and 4 are economically infeasible. Feasibility is defined by PRC Section 15364 as "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors." As explained in Alternative 2, the cost to complete the necessary ADA upgrades and seismic retrofits such that the building and safely be occupied for use exceeds the value of the preserved building by approximately $5,663,653.[6] In this Alternative, the considerable additional cost for the relocation would mean the costs associated with relocation are likely much higher than Alternative 2, whereas the value of the preserved building (based on total leasable square footage) is unlikely to change significantly at its new location.

Reference

See Draft EIR Section V for complete analysis of alternatives evaluated for the Project. See Appendices H-12, H-13, H-14, H-15, and H-16 for additional supporting documentation.

The building would have to be able to be located in the same general orientation to the street, facing generally south, with similar setbacks, hardscape and landscape.

[6] If the necessary ADA upgrades and seismic retrofitting are forgone, the relocated building could not be occupied and this Alternative would not meet the second project objective.

Alternatives Rejected as Infeasible

As set forth in CEQA Guidelines Section 15126.6(c), an EIR should identify any alternatives that were considered for analysis but rejected as infeasible and no further analysis is provided in the EIR. For those rejected alternatives, the EIR should briefly explain the reasons for their rejection. According to the CEQA Guidelines, among the factors that may be used to eliminate an alternative from detailed consideration are the alternative's failure to meet most of the basic project objectives, the alternative's infeasibility, or the alternative's inability to avoid significant environmental impacts. Alternatives to the Project that were considered and rejected as infeasible include the following:

One alternative that was considered was mothballing the Barry Building in accordance with *Preservation Brief 31: Mothballing Historic Buildings,* prepared by the National Park Service. Preservation Brief 31 outlines the steps required to close up and temporarily protect an historic building for an extended period of time while planning its future use. Historic Resources Group prepared a memo that outlines the steps to properly mothball a building (see Appendix H-1 of the Draft EIR). However, mothballing is not a long-term solution that can achieve the project objectives, including compliance with the Soft Story Ordinance and therefore, this alternative was rejected.

Environmentally Superior Alternative

Section 15126.6(e)(2) of the CEQA Guidelines indicates that an analysis of alternatives to a project shall identify an Environmentally Superior Alternative among the alternatives evaluated in an EIR. The CEQA Guidelines also state that should it be determined that the No Project Alternative is the Environmentally Superior Alternative, the EIR shall identify another Environmentally Superior Alternative among the remaining alternatives. Pursuant to Section 15126.6(c) of the CEQA Guidelines, the analysis below addresses the ability of the alternatives to "avoid or substantially lessen one or more of the significant effects" of the Project.

Alternative 1 (the No Project Alternative) would be environmentally superior to the Project since this alternative would avoid the Project's significant and unavoidable impacts with respect to historical resources and land use. In addition, Alternative 1 would not include an operational component and, therefore, would not result in any operational impacts.

Among the remaining alternatives, Alternative 2 (the Preservation Alternative) is environmentally superior to Alternatives 3 and 4. As noted above, Alternative 2 would involve the work to comply with the City's Soft Story Ordinance, as well as a voluntary seismic retrofit and additional upgrades (like ADA compliance) in order to make the existing building suitable for occupancy. This Alternative would lessen the significant and unavoidable impacts to historic resources and land use/planning compared to the Project as it would not require demolition of the Barry Building. However, Alternative 2 would result in greater construction and operational impacts compared the Project.

Alternatives 2, 3, and 4 would all reduce the significant and unavoidable impacts to historic resources and land use/planning that would occur under the Project to less than significant levels. When compared to Alternative 2, Alternative 3 consists of more development and as such, would result in more impacts than Alternative 2.

Comparing Alternative 2 and Alternative 4, Alternative 4 would result in greater impacts with respect to the character-defining features of the Barry Building, and would therefore require the implementation of additional mitigation measures to avoid a significant impact with respect to historical resources. Alternative 4 would have greater impacts than Alternative 2.

Therefore, Alternative 2 is the Environmentally Superior Alternative.

However, the determination of the "environmentally superior" alternative does not include an evaluation of the feasibility of the environmentally superior alternative.

IX. Significant Irreversible Environmental Changes

Section 15126.2(d) of the CEQA Guidelines indicates that an EIR should evaluate any significant irreversible environmental changes that would occur should the proposed project be implemented. The types and level of development associated with the project would consume limited, slowly renewable, and non-renewable resources. This consumption would occur during construction of the project and would continue throughout its operational lifetime. The development of the Project would require a commitment of resources that would include: (1) building materials and associated solid waste disposal effects on landfills; (2) water; and (3) energy resources (e.g., fossil fuels) for electricity, natural gas, and transportation. The Project Site contains no energy resources that would be precluded from future use through Project implementation. For the reasons set forth in Section VI.3, of the Draft EIR, the project's irreversible changes to the environment related to the consumption of nonrenewable resources would not be significant, and the limited use of nonrenewable resources is justified.

The Project would necessarily consume a limited amount of slowly renewable and non-renewable resources that could result in irreversible environmental changes, including: (1) solid waste disposal effects on landfills; (2) water; and (3) energy resources. As explained in Section VI.3 of the Draft EIR, the Project would not consume a large commitment of natural resources or result in significant irreversible environmental changes.

Building Materials and Solid Waste

Solid waste was addressed in the Initial Study (included in Appendix A-1 of the Draft EIR). As discussed therein, the Project would demolish of the existing commercial building, which is expected to generate a total of approximately 4,174 cubic yards of debris, including 130 cubic yards of asbestos-containing material and 4,044 cubic yards of non-contaminated debris. The 130 cubic yards of asbestos-containing material would be entirely disposed of at the Azusa Land Reclamation Facility. Compliance with SB 1374 would require the recycling or salvaging of 75 percent of the remaining 4,044 cubic yards of debris. This would equate to approximately 1,011 cubic yards (or 404,400 pounds or 202 tons) that would be disposed of at a landfill over the course of demolition. The Initial Study determined that the landfills serving the Project Site would have adequate capacity to accommodate the solid waste generated by the demolition of the existing building. Because of the recycling of most of the solid waste generated by the Project, and the available capacity at landfills serving the Project Site, the Project's short-term solid waste disposal effects on landfills would be reduced.

Water

As stated in the Initial Study (included in Appendix A-1 of the Draft EIR), the Project would require a limited amount of water for dust control during demolition activities and to water the landscape

buffer planted along the fence after demolition has been completed. As discussed in the Initial Study, LADWP would be able to supply water for the Project's demolition activities and to water the landscape buffer based on its existing supply. Thus, while the Project would result in a limited amount of irreversible consumption of water, the Project would not result in a significant impact related to water supply.

Energy Consumption and Air Quality

The proposed construction activities would consume relatively minor quantities of electricity (i.e., temporary use for lighting and small power tools). This electricity would be supplied to the Project Site by the City of Los Angeles Department of Water and Power (LADWP) and would be obtained from the existing electrical lines that connect to the Project Site. Electricity consumed during demolition of the existing building and installation of the landscape buffer would be temporary and would cease upon the completion. Construction activities would also consume energy in the form of petroleum-based fuels associated with the use of construction vehicles, construction worker travel to and from the Project Site, and hauling truck trips. Based on the limited amount of equipment required and the limited duration of construction activities, the Project would require a negligible fraction of the State's total transportation fuel consumption. Therefore, the Project would not have an adverse impact on available electricity or fuel supplies.

The Project consists solely of the demolition of the existing building and the installation of a landscape buffer on the southern boundary of the Project Site. Development of the Project Site is not proposed and/or considered as part of the Project. Therefore, the Project would not have an operational demand for energy, with the exception of a limited amount of electricity for sprinklers to water the landscape buffer.

Overall, the Project would not result in the wasteful, inefficient, and unnecessary consumption of energy resources, and Project impacts would be less than significant.

Conclusion

Based on the above, the Project would require the irreversible commitment of limited, slowly renewable, and non-renewable resources, which would limit the availability of these resources for future generations or for other uses. However, the consumption of such resources would not be considered substantial. The loss of such resources would not be highly accelerated when compared to existing conditions and such resources would not be used in a wasteful manner. Therefore, although irreversible environmental changes would result from the Project, such changes are concluded to be less than significant, and the limited use of nonrenewable resources that would be required by the Project's construction activities is justified.

X. Growth-Inducing Impacts

Section 15126.2(e) of the CEQA Guidelines requires a discussion of the ways in which a proposed project could induce growth. This includes ways in which a project would foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Included in this are projects which would remove obstacles to population growth, or increases in the population which may tax existing community service facilities, requiring construction of new facilities that could cause significant environmental effects. Additionally, consideration must be given to characteristics of some projects which may encourage and facilitate other activities that could significantly affect the environment, either

individually or cumulatively. It must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment.

The Project consists of the demolition of the Barry Building. Once demolition is complete, the portion of the Project Site that currently contains the Barry Building would be a vacant lot, and the existing surface parking lot would remain. A landscape buffer would be installed along the southern boundary of the Project Site (fronting San Vicente Boulevard). Development of the Project Site is not proposed and/or considered as part of the Project. The demolition activities would require a daily maximum of 10 construction workers during any given day. The patterns of construction workers in Southern California are such that it is not likely that the workers for the Project would relocate their households as a consequence of being employed to conduct the Project's demolition work, especially given the short duration of demolition activities. Therefore, the Project would not be considered growth-inducing from a short-term employment perspective. Rather, the Project would provide a public benefit by providing employment opportunities during the demolition period.

As the Project does not include any new development on the Project Site, the Project would not result in a population increase at the Project Site due to new housing or employment opportunities that could result in substantial unplanned growth either directly or indirectly. Likewise, the Project also would not require any utility infrastructure improvements. Therefore, the Project would not result in any direct or indirect growth-inducing impacts.

XI. Energy Conservation

The Project's demolition activities would consume relatively minor quantities of electricity and fuel, particularly as the Project would be temporary. Electricity consumed during demolition of the existing building and installation of the landscape buffer would be temporary and would cease upon the completion. All construction and demolition equipment would meet applicable fuel efficiency standards.

The Project does not have an operational component and therefore would not have an operational demand for energy, with the exception of a limited amount of electricity for sprinklers to water the landscape buffer. The Project would not result in the wasteful, inefficient, and unnecessary consumption of energy resources.

XII. Statement of Overriding Considerations

The EIR identifies unavoidable significant impacts that would result from implementation of the Project. PRC Section 21081 and CEQA Guidelines Section 15093(b) provide that when a decision of a public agency allows the occurrence of significant impacts that are identified in the EIR, but are not at least substantially mitigated to an insignificant level or eliminated, the lead agency must state in writing the reasons to support its action based on the EIR and/or other information in the record. The State CEQA Guidelines require, pursuant to CEQA Guidelines Section 15093(b), that the decision-maker adopt a Statement of Overriding Considerations at the time of approval of a project if it finds that significant adverse environmental effects have been identified in the EIR that cannot be substantially mitigated to an insignificant level or be eliminated. These findings and the Statement of Overriding Considerations are based on the documents and materials that constitute the record of proceedings, including, but not limited to, the Final EIR and all technical appendices attached thereto.

Based on the analysis in Sections IV.B and IV.D of the Environmental Impact Analysis, of the Draft EIR, implementation of the Project would result in significant impacts to cultural resources (historical resources) and land use and planning (conflict with plans) that cannot be feasibly mitigated attributable to the demolition of an HCM.

Accordingly, the City adopts the following Statement of Overriding Considerations. The City recognizes that significant and unavoidable impacts would result from implementation of the project. Having (i) adopted all feasible mitigation measures, (ii) rejected as infeasible the alternatives to the project discussed above, (iii) recognized all significant, unavoidable impacts, and (iv) balanced the benefits of the project against the project's significant and unavoidable impacts, the City hereby finds that each of the project's benefits listed below outweigh and override the significant unavoidable impacts relating to the demolition of an HCM.

The below stated reasons summarize the benefits, goals and objectives of the Project, and provide the detailed rationale for the benefits of the Project. These overriding considerations of economic, social, aesthetic, and environmental benefits for the Project justify adoption of the Project and certification of the completed EIR. Each of the listed project benefits set forth in this Statement of Overriding Considerations provides a separate and independent ground for the City's decision to approve the project despite the project's identified significant and unavoidable environmental impacts. Each of the following overriding considerations separately and independently (i) outweighs the adverse environmental impacts of the Project, and (ii) justifies adoption of the Project and certification of the completed EIR. In particular, achieving the underlying purpose for the Project would be sufficient to override the significant environmental impacts of the Project.

1. The Project would remove an existing safety hazard and seismically unsafe structure, which includes significantly seismically overstressed building portions, in compliance with the Soft Story Ordinance, and objectives to protect public safety or possible occupants in the event of a moderate to severe earthquake;
2. The Project would remove an attractive nuisance, namely a building known to be vacant, that may give rise to break-ins and other unlawful behavior, and which could pose safety and other risks to the surrounding community and adjacent properties for unlawful behavior within a structurally unsound building;
3. The Project would pursue an economically feasible improvement to the property in a manner that will also benefit the surrounding community by removing public safety risks and health hazards;
4. The Project would create an additional vacant site that could accommodate housing or other commercially viable development in the future, built to more energy-efficient and structurally safer modern building codes, contributing to the City's Regional Housing Needs Assessment (RHNA) allocations and the City's critical housing need, or providing new commercial uses in line with smart growth policies and transit-oriented development; and
5. The Project would create jobs during demolition for construction workers in the City.

General Findings.

1. The City finds that the EIR was prepared in compliance with CEQA and the CEQA Guidelines. The City finds that it has independently reviewed and analyzed the EIR for the project, that the Draft EIR which was circulated for public review reflected its independent judgment and that the Final EIR reflects the independent judgment of the City.

2. The EIR evaluated the following potential project and cumulative environmental impacts: air quality, cultural resources, greenhouse gas emissions, land use and planning, noise, transportation and traffic, and tribal cultural resources, alternatives, and other CEQA considerations. Additionally, the EIR considered, in separate sections, Significant Irreversible Environmental Changes and Growth Inducing Impacts. The significant environmental impacts of the project and the alternatives were identified in the EIR.

3. The City finds that the EIR provides objective information to assist the decision makers and the public at large in their consideration of the environmental consequences of the project. The public review periods provided all interested jurisdictions, agencies, private organizations, and individuals the opportunity to submit comments regarding the Draft EIR. The Final EIR was prepared after the review periods and responds to comments made during the public review periods.

4. The City evaluated comments on environmental issues received from persons who reviewed the Draft EIR. In accordance with CEQA, the City prepared written responses describing the disposition of significant environmental issues raised. The Final EIR provides adequate, good faith and reasoned responses to the comments. The City reviewed the comments received and responses thereto and has determined that neither the comments received nor the responses to such comments add significant new information regarding environmental impacts to the Draft EIR. The Lead Agency has based its actions on full appraisal of all viewpoints, including all comments received up to the date of adoption of these findings, concerning the environmental impacts identified and analyzed in the EIR.

5. The Final EIR documents changes to the Draft EIR. Having reviewed the information contained in the Draft EIR, the Final EIR, and the administrative record, as well as the requirements of CEQA and the CEQA Guidelines regarding recirculation of Draft EIRs, the City finds that there is no new significant impact, substantial increase in the severity of a previously disclosed impact, significant new information in the record of proceedings or other criteria under CEQA that would require additional recirculation of the Draft EIR, or that would require preparation of a supplemental or subsequent EIR. Specifically, the City finds that:

    - The Responses to Comments contained in the Final EIR fully considered and responded to comments claiming that the project would have significant impacts or more severe impacts not disclosed in the Draft EIR and include substantial evidence that none of these comments provided substantial evidence that the project would result in changed circumstances, significant new information, considerably different mitigation measures, or new or more severe significant impacts than were discussed in the Draft EIR.

    - The City has thoroughly reviewed the public comments received regarding the project and the Final EIR as it relates to the project to determine whether under the requirements of CEQA, any of the public comments provide substantial evidence that would require recirculation of the EIR prior to its adoption and has determined that recirculation of the EIR is not required.

    - None of the information submitted after publication of the Final EIR, including testimony at the public hearings on the project, constitutes significant new

information or otherwise requires preparation of a supplemental or subsequent EIR. The City does not find this information and testimony to be credible evidence of a significant impact, a substantial increase in the severity of an impact disclosed in the Final EIR, or a feasible mitigation measure or alternative not included in the Final EIR.

- The mitigation measures identified for the project were included in the Draft EIR and Final EIR. The final mitigation measures for the project are described in the Mitigation Monitoring Program (MMP). Each of the mitigation measures identified in the MMP is incorporated into the project. The City finds that the impacts of the project have been mitigated to the extent feasible by the mitigation measures identified in the MMP.

6. CEQA requires the Lead Agency approving a project to adopt a MMP or the changes to the project which it has adopted or made a condition of project approval in order to ensure compliance with the mitigation measures during project implementation. The mitigation measures included in the EIR as certified by the City and revised in the MMP as adopted by the City serve that function. The MMP includes all of the mitigation measures and project design features adopted by the City in connection with the approval of the project and has been designed to ensure compliance with such measures during implementation of the project. In accordance with CEQA, the MMP provides the means to ensure that the mitigation measures are fully enforceable. In accordance with the requirements of Public Resources Code Section 21081.6, the City hereby adopts the MMP.

7. The custodian of the documents or other materials which constitute the record of proceedings upon which the City decision is based is the City of Los Angeles, Department of City Planning.

8. The City finds and declares that substantial evidence for each and every finding made herein is contained in the EIR, which is incorporated herein by this reference, or is in the record of proceedings in the matter.

9. The City is certifying an EIR for, and is approving and adopting findings for, the entirety of the actions described in these Findings and in the EIR as comprising the project.

10. The EIR is a project EIR for purposes of environmental analysis of the project. A project EIR examines the environmental effects of a specific project. The EIR serves as the primary environmental compliance document for entitlement decisions regarding the project by the City and the other regulatory jurisdictions.

INFORMATION BULLETIN / PUBLIC – BUILDING CODE
REFERENCE NO.: Effective: 01-01-2023
DOCUMENT NO.: P/BC 2023-149 Revised:
Previously Issued As: P/BC 2020-149

PROCEDURE FOR PROCESSING "ERROR OR ABUSE OF DISCRETION" APPEALS OF LADBS ACTIONS TO THE BOARD OF BUILDING AND SAFETY COMMISSIONERS

This Information Bulletin provides the procedure for processing requests for Modification of Building Ordinances (Request for Modification) and, subsequently, appeals alleging error or abuse of discretion by the Los Angeles Department of Building and Safety ("LADBS") concerning the City of Los Angeles Building Code (LABC) or other items within the powers of the Board of Building and Safety Commissioners (BBSC) as granted by LAMC 98.0403.1(b). Such appeals shall be filed in accordance with procedures outlined in LAMC Section 98.0403.2.

LADBS staff uses the following guidelines to process appeals filed under LAMC 98.0403.2:

1. PROCESSING FEES

The customer shall complete the Request for Modification Form and provide the request to the LADBS staff member along with exhibits and any pertinent information for the request. The LADBS staff member's supervisor will determine the processing fees pursuant to LAMC Section 98.0403.2(a) and refer the customer to cashier with (3) copies. Processing fees are $130.00 for the first item and $39.00 for each additional item, plus $208.00 for two (2) hours of research. For complex requests requiring more than two (2) hours of research, an additional research fee may be imposed.

Note: At satellite offices where cashiers are not available, the appellant may leave a check or money order made out to the "City of Los Angeles" for the appropriate amount. LADBS shall process the application and send a copy with receipt of payment to the appellant.

2. DETERMINATION

The LADBS Staff member's supervisor shall make a determination to grant, grant with conditions, or deny the Request for Modification and provide said information to the customer. If dissatisfied with the supervisor's interpretation, the customer can file an appeal under LAMC Section 98.0403.2(b).

LAMC Section 98.0403.2(b). appeals shall be submitted to the Chief Inspector, Building Civil Engineer and above in charge of the office where the determination was made. (The term "Manager" shall be used hereinafter to describe this senior staff position.)

If the Manager determines that LADBS neither erred nor abused its discretion in making the determination, and the appellant wishes formally to initiate the appeal process, the Manager shall provide the required "Supplemental Application for Appeals" Form (Appeal Form) and

As a covered entity under Title II of the Americans with Disabilities Act, the City of Los Angeles does not discriminate on the basis of disability and, upon request, will provide reasonable accommodation to ensure equal access to its programs, services and activities. For efficient handling of information internally and in the internet, conversion to this new format of code related and administrative information bulletins including MGD and RGA that were previously issued will allow flexibility and timely distribution of information to the public.

instruct the appellant how to complete the form.

The appellant must itemize the grounds for the appeal, along with applicable LAMC sections, on the Appeal Form. The Request for Modification Form and any evidence supporting the appeal, such as photographs and correspondence should be submitted as an attachment to the appeal form.

No additional information will be accepted by the Department after the appeal form has been submitted unless a new appeal form is filed and applicable fees are paid.

3. REVIEW OF APPEAL FORMS AND FEE FOR WRITTEN REPORT

The Manager shall review the appeal package for completeness. If the Manager determines that the form and all attachments clearly state the grounds for the appeal and cannot be approved administratively, the Manager shall complete the fees portion on page two of the Request for Modification form as outlined in LAMC Section 98.0403 (b) and refer the customer to cashiers with (3) copies. Filling fees are based on the subject of the request as set forth in Tables 4A or 4B plus $104.00 for (1) hour of research.

4. ROUTE ORIGINAL APPEAL PACKAGE

After the fees are paid, the appellant shall return the original appeal package and a copy of the paid request for modification form to the Manager. The Manager shall ensure that the appellant's original appeal package is hand delivered to the Commission Office. The Commission staff shall log the appeal by assigning a case number, creating a case file and assigning the case to the responsible manager.

5. WRITTEN DETERMINATION

The Manager assigned to the case shall prepare a report and presentation setting forth the justifications and findings for LADBS's determination, specifically addressing the appellant's issues. The report shall be completed within 60 days from the date of the appeal's submittal and the item shall be scheduled for the next available BBSC hearing date. For complex requests, additional time may be required to complete the report.

6. NOTIFICATION OF PUBLIC HEARING

When the appeal is scheduled for a hearing before the BBSC, the Commission staff shall notify the appellant through a written notice at least ten days prior to the date of the hearing. The notice shall be given by email or U.S. mail.

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REQUEST FOR MODIFICATION OF BUILDING ORDINANCES

UNDER AUTHORITY OF L.A.M.C. SECTION 98.0403

PERMIT APP. #:	**DATE:**	**For City Dept. Use Only** **Building Zoning** **Grading Shoring** **Mech. Elec. Plumb.** **Green D.A. Misc.**
JOB ADDRESS:		
Tract:	**Block:** **Lot:**	
Owner: Address: City State Zip Phone	Petitioner: Address: City State Zip Phone	

REQUEST (SUBMIT PLANS OR ADDITIONAL SHEETS AS NECESSARY) | CODE SECTIONS:

JUSTIFICATION (SUBMIT PLANS OR ADDITIONAL SHEETS AS NECESSARY)

Owner/Petitioner Name (Print) **(Signature)** **Position**

FOR CITY DEPARTMENT'S USE ONLY BELOW THIS LINE

Concurrences required from the following Department(s)			Approved	Denied
☐ Los Angeles Fire Department	Print Name_____	Sign_____	☐	☐
☐ Public Works Bureau of Engineering	Print Name_____	Sign_____	☐	☐
☐ Department of City Planning	Print Name_____	Sign_____	☐	☐
☐ Department of County Health	Print Name_____	Sign_____	☐	☐
☐ Other _____	Print Name_____	Sign_____	☐	☐

DEPARTMENT ACTION

☐ **GRANTED** ☐ **DENIED**

Reviewed by: (Staff) (Print) ***Sign*** ***Date***

Action taken by: (Supervisor) (Print) ***Sign*** ***Date***

NOTE: IN CASE OF DENIAL, SEE PAGE #2 OF THIS FORM FOR APPEAL PROCEDURES

CONDITIONS OF APPROVAL (Continued on Page 2):

For Cashiers Use Only

(PROCESS ONLY WHEN FEES ARE VERIFIED)

(DEPARTMENT USE ONLY)

FEES

Appeal Processing Fee.. (No. of Items) =	1	X $130 + $39/addl	= 130.00
Inspection Fee ..... (No of Insp.) =		X $ 84.00	=
Research Fee ... (Total Hours Worked) =	2	X $104.00	= 208.00
Subtotal			= 338.00
Development Services Center Surcharge		X .03	= 10.14
Systems Development Surcharge		X .06	= 20.28
Total Fees			= 368.42

Fees verified by:

Print and Sign _____

Permit App #:	Job Address:

CONDITIONS OF APPROVAL (Continued from Page 1)

CITY OF LOS ANGELES
BOARD OF BUILDING AND SAFETY/DISABLED ACCESS COMMISSION APPEAL FORM

(Must be Attached to the Modification Request Form, Page 1)

AFFIDAVIT – LADBS BOARD OF BUILDING AND SAFETY COMMISSIONERS – RESOLUTION NO. 832-93

I, _____ do state and swear as follows:
(Print or Type Name of the Person Signing this Form)

1. The name and mailing address of the owner of the property (as defined in the resolution 832-93) at _____ as shown on the appeal application (LADBS Com 31) are correct, and
2. The owner of the property as shown on the appeal application will be made aware of the appeal and will receive a copy of the appeal.

I declare under PENALTY OF PERJURY that the forgoing is true and correct.

Owner's Name(s) _____ _____
(Please Type or Print) (Please Type or Print)

Owner's Signature(s) _____ (Two Officers' Signatures Required for Corporations)
(Please Sign)

Name of Corporation _____ _____
(Please Print Name of Corporation) (Please Type or Print)

Dated this _____ day of _____ 20_____

CALIFORNIA ALL-PURPOSE ACKNOWLEDGEMENT----------SIGNATURE(S) MUST BE NOTARIZED

State of **CALIFORNIA** County of _____ on _____

before me, _____, personally appeared _____,
Name, Title of Officer (e.g. Jane Doe, Notary Public) Name(s) of Signer(s)

who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument in person(s), or the entity upon behalf of which the person(s) acted, executed the instrument. **I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing is true and correct.**

WITNESS my hand and official seal. Signature _____

As a covered entity under Title II of the Americans with Disabilities Act, the City of Los Angeles does not discriminate on the basis of disability and, upon request, will provide reasonable accommodation to ensure equal access to its programs, services and activities.

APPEAL OF DEPARTMENT ACTION TO THE BOARD OF BUILDING AND SAFETY COMMISSIONERS/DISABLED ACCESS APPEALS COMMISSION

_____ _____
Applicant's Name Applicant's Title

_____ _____
Signature Date

FEES

(DEPARTMENT USE ONLY)

Board Fee ..... (No. of Items)	1	X $354 +$215/addl	=	354.00
Inspection Fee ..... (No of Insp.) =		X 84.00	=	0.00
Research Fee ... (Total Hours Worked) =	2	X 104.00	=	208.00
Subtotal			=	562.00
Development Services Center Surcharge		X .03	=	16.86
Systems Development Surcharge		X .06	=	33.72
Total Fees			=	612.58

Fees verified by:

Print and Sign _____

For Cashiers Use Only
(PROCESS ONLY WHEN FEES ARE VERIFIED)

SUPPLEMENTAL APPLICATION FOR APPEALS

TYPE OF APPEAL:

- ☐ BUILDING CODE APPEAL
- ☐ ZONING CODE APPEAL
- ☐ INSPECTION / CODE ENFORCEMENT APPEAL

PROJECT TYPE:

- ☐ ONE OR TWO FAMILY RESIDENTIAL
- ☐ MULTI-FAMILY RESIDENTIAL
- ☐ COMMERCIAL/INDUSTRIAL

PERMIT APPLICATION:		
ADDRESS:		ZIP:
TRACT:	BLK:	LOT:
OWNER NAME:	OWNER ADDRESS:	ZIP:

APPLICATION INFORMATION:

NAME:	ADDRESS:	ZIP:
EMAIL:	APPLICANT SIGNATURE:	DATE:

ISSUES:	VIOLATION:	CODE SECTION:
1.		
2.		
3.		

- ❖ FOR ADDITIONAL ISSUES, ATTACH TO THIS APPLICATION
- ❖ ATTACH ALL APPLICABLE EXHIBITS AND EVIDENCE TO THIS APPLICATION

SUPPLEMENTAL APPLICATION FOR APPEALS

ISSUES:	VIOLATION:	CODE SECTION:
4.		
5.		
6.		
7.		
8.		
9.		

Attachment B

Civil Service Class Specifications

Attachment B-1

BINH PHAN, Permit and Engineering Bureau Chief

Note: Most recent available as of 07/20/2025 from City Personnel Office Website

CITY OF LOS ANGELES
CIVIL SERVICE COMMISSION

CLASS SPECIFICATION
POSTED JUNE 1999

05-15-98 **STRUCTURAL ENGINEERING ASSOCIATE, 7957**

Summary of Duties: Performs professional structural engineering work in the preparation or checking of designs, plans, specifications, estimates, and reports for a variety of structures; and does related work.

Distinguishing Features: Structural Engineering Associate I is the normal entry level to the class. Employees at this level usually have little, if any, experience or special training. They initially perform the less complex professional engineering work under close supervision while learning and assisting in a variety of routine duties. As employees become more experienced, they may work independently and may be responsible for one or more large projects. Positions at this level are designated as three-year temporary training positions under Civil Service Rule 5.30. Employees with two years of full-time City experience as a Structural Engineering Associate I and an Engineer-in-Training (EIT) Certificate, would automatically move to the Structural Engineering Associate II level.

Employees at the Structural Engineering Associate II level perform journey level Structural engineering work requiring a broad knowledge of structural engineering skills. Individuals at this level usually work independently, receiving instructions in general terms, and may be responsible for one or more major City Projects having a wide impact and significant cost. Employees may serve as a lead over a small group of lower level employees.

Employees at the Structural Engineering Associate III level may supervise, or may serve as a lead over a small group of employees, or as a project manager or project engineer involved in work that is technically complex and requires considerable experience, skill and engineering knowledge. Two years of full-time paid, professional experience at the level of Structural Engineering Associate II and registration as a professional engineer with the California State Board of Registration for Professional
Engineers is required for advancement to this level.

Employees at the Structural Engineering Associate IV level are non-supervisory technical experts, who shall maintain the skills and expertise necessary to remain at the higher paygrade level. They may conduct extensive research into new technical developments and evaluate their suitability for City use, may prepare

standards for technical design, may develop and conduct training for other employees about new procedures and techniques, or may act as an internal consultant to other employees or on very difficult issues. These positions are designated by Department Management according to the Department's needs. Some positions require registration as a professional engineer with the California State Board of Registration for Professional Engineers, as determined by department management.

Example of Duties: A Structural Engineering Associate:

- checks and may supervise a group of employees who checks, plans for residential and commercial structures for conformance to the City Building Code, zoning ordinances, and applicable state laws;
- may use computer generated calculations to review or conduct analyses of plans involving varying structural systems;
- checks plans for health, fire, and life safety requirements for the varied uses of buildings;
- enforces zoning regulations;
- reviews building and grading permit applications and issues permits;
- answers questions pertaining to Building Code and zoning requirements at a public counter;
- may review and approve soils engineering reports and plans for grading operations;
- may be required to prepare reports and make presentations before City commissions or Council Committees;
- may be required to train other engineering employees in the application of the Building Code, zoning ordinance, State laws, new engineering developments and construction practices;
- trains, and may supervise a small group of employees in the preparation of designs, plans, specifications, quality assurance plans, conceptual and detailed cost estimates, budgetary and authorization for expenditure documents, requisitions to order materials, schedules, EIR's, and negative declarations to EIR's, and other reports necessary for the construction, maintenance and operation of a wide variety of concrete, masonry, steel, metal and timber structures;
- performs dynamic analysis of structures including equipment and equipment support systems;
- administers fabrications and construction contracts;
- prepares feasibility studies, preliminary design, and layouts for proposed structures and facilities;

- advises contractors and construction inspectors on structural problems arising during construction;
- investigates and recommends repair of structural damage or deterioration to existing facilities;
- evaluates wharves and structures for crane, railroad, or other overloads and determines adequacy of structures for proposed loading;
- may act as project engineer, or advises and assists project engineers and construction supervisors on structural engineering problems;
- performs contract administration of engineering consultant contracts for Public Works projects;
- prepares and negotiates change orders with contractors on Public Works construction projects;
- checks and reviews plans submitted by private engineers or developers for structures in the public right-of-way in conformance to City standards and policies;
- provides inspections and makes recommendations for maintenance and repair of City bridges in conformance with California Department of Transportation requirements;
- interprets designs and specifications for construction forces;
- personally performs or assists in the supervision of implementation of quality control/quality assurance activities on construction of all types of structures;
- performs quality control functions for materials used on construction projects, including fabricated assemblies;
- rejects or reports materials which do no meet specifications;
- inspects and makes recommendations regarding the maintenance and strengthening of existing buildings of archaic construction;
- inspects and investigates manufacturing plants prior to the awarding of contracts to determine the adequacy of staff and plant facilities to meet contract requirements;

Example of Duties (cont.):

- performs job administration functions including obtaining permits, contract bid evaluations, and job cost and scheduling control;
- may interpret or clarify assignments and outlines procedures for subordinates, including engineering personnel employed through the use of personal services contracts;
- reviews completed work for conformation to recognized standards and feasibility of construction, as well as for completeness and accuracy;
- reviews project status, initiates changes and provides advice and assistance to engineering and construction personnel;
- prepares plans and calculations for dredging projects;
- recommends corrosion control measures for metal wharves and steel piles;
- may supervise or assist in supervising a large drafting unit engaged in

preparing design drawings for a wide variety of structural and architectural projects;

May occasionally be assigned to other duties for training purposes or to meet technological changes or emergencies.

Qualifications: Incumbents must have the following knowledges and abilities:

Knowledges of:

- the principles of structural engineering, including recognized standards, as applied to the preparation or checking of designs, plans, specifications, and estimated for reinforced concrete, masonry, steel, and timber structures, and drafting
- the sources of engineering information;
- engineering mathematics;
- field survey and construction practices;
- engineering mechanics and of mechanics of materials.

The ability to:

- apply engineering principles to the solution of specific problems;
- apply the basic fundamentals of computer aided design and drafting;
- deal tactfully and effectively with employees and the public;
- communicate effectively both orally and in writing;
- prepare clear and comprehensive technical reports, charts and graphs.

Persons with disabilities may be able to perform the essential duties of this class with reasonable accommodation. Reasonable will be evaluated on an individual basis and depend, in part, on the specific requirements for the job, the limitations related to the disability, and the ability of the hiring department to accommodate the limitation.

Minimum Requirements:

Graduation from a school of engineering in a recognized four-year college or university with a degree in engineering which includes at least 12 semester units or 18 quarter units of structural engineering courses, or possession of a valid Engineer-in-Training Certificate issued by the California State Board of Registration of Professional Engineers is required.

License: A valid California driver's license may be required.

As provided in Civil Service Commission Rule 2.5 and Section 4.55 of the Administrative Code, this specification is descriptive, explanatory and not restrictive. It is not intended to declare what all of the duties, responsibilities, and required qualification of any position shall be.

Note: Most recent available as of 07/20/2025 from City Personnel Office Website

11-16-90 **BUILDING CIVIL ENGINEER, 7244**

Summary of Duties: A Building Civil Engineer plans, organizes, and directs the work of an engineering group checking plans, designs and specifications for a variety of buildings for compliance with the Los Angeles City Building Code, Planning and Zoning Code, and the State Building Codes for energy conservation and building access by the physically disabled. A Building Civil Engineer performs professional civil engineering work when checking plans for the more complex buildings and making special engineering studies. Incumbents use sound supervisory rules and techniques to build and maintain an effective staff and satisfy affirmative action responsibilities, and does related work.

Distinguishing Features: A Building Civil Engineer normally supervises an engineering group which checks plans, designs, and specifications for structural as well as non-structural criteria on a variety of buildings. A Building Civil Engineer personally directs or performs the more difficult work or has overall responsibility for a project and uses considerable independent judgment in carrying it out.

A Building Civil Engineer determines what is to be done, personally supervises the most difficult parts of the work, and delegates work to subordinates. As a bona fide supervisor, a Building Civil Engineer performs the full range of supervisory activities including: disciplining employees, taking care of grievances, rating employee performance, and approving time-off requests.

The classes of Building Civil Engineer and Civil Engineer are different because:

* A Civil Engineer supervises employees preparing plans, designs, and specifications for bridges, sewage treatment plants, and other public construction projects.
* A Building Civil Engineer supervises employees checking structural, civil, and architectural plans to enforce the building, planning and zoning, energy, grading, and handicapped codes and regulations for private as well as public construction.
* A Building Civil Engineer does forensic analysis of buildings after structural failures or disasters.

The classes of Building Civil Engineer and Structural Engineer are different because:

* A Structural Engineer must be registered as a Structural Engineer with the California State Board of Registration for Professional Engineers in order to have the legal authority to be in responsible charge to perform structural engineering work.
* A Structural Engineer supervises an engineering group preparing or checking designs, plans, and specifications for a variety of structures to ensure structural integrity and code compliance of the planned structure.
* A Building Civil Engineer supervises an engineering group checking designs, plans, and specifications to enforce the building, planning and zoning, energy, grading, and handicapped codes and regulations.

Examples of Duties: A Building Civil Engineer:

* Supervises an engineering group which checks plans, designs, and specifications for a variety of buildings in low-rise commercial and residential developments in areas such as fire safety, zoning, grading, disabled access, and energy conservation. This includes new construction, alterations, and additions to existing buildings.
* Makes recommendations on Department zoning enforcement policies in areas such as demolitions, heights of buildings, and land uses.
* Approves the ending of building covenants and agreements.
* Reviews proposed zoning code ordinances and State laws and writes Department position papers.
* Gives employees equal employment/affirmative action information.

* Selects, orients, assigns, trains, counsels, and disciplines employees using job-related criteria.
* Helps employees prepare for promotion as described in the City's Affirmative Action Program.
* May check plans, designs, and specifications for the more complex buildings.
* May be a supervisor or advisor in a semi-structural or non-structural engineering job such as code research and development or coordinating construction plan processing from beginning to end.
* May meet with engineers, architects, and contractors about a proposed building or about problems with projects under construction to see how to meet the codes and regulations.

Sometimes may do other work for training purposes or to meet technological changes or emergencies.

Qualifications: Incumbents must have the following knowledges and abilities:

A good knowledge of:
* The recognized methods and practices used in structural engineering to check plans, designs and specifications for a variety of structures.
* Engineering mechanics and the mechanics of materials.
* The City Building Code, the Planning and Zoning Code, and the State Codes for energy conservation, handicapped access, and grading regulations.
* Common sources of engineering knowledge.
* Supervisory principles and practices including: planning, delegating, and controlling the work of employees.
* Techniques for counseling, disciplining, training, instructing, and motivating employees.
* Techniques for evaluating employee work performance.
* Procedures for handling grievances.
* Supervisory responsibility for EEO/AA as set forth in the City's Affirmative Action Program.
* Effective safety principles and practices.

A working knowledge of:
* memoranda of understanding as they apply to employees.

A general knowledge of:
* City personnel rules, policies, and procedures.

The ability to:
* Prepare and analyze comprehensive technical reports.
* Plan, layout, and direct the work of a group of employees.
* Coordinate the work of an engineering group with an overall program.
* Establish and maintain a work environment to enhance both employee morale and productivity.
* Apply sound supervisory principles and techniques.

* Fulfill supervisory affirmative action responsibilities as indicated in the City's Affirmative Action Program.
* Deal tactfully and effectively with employees and the public.

Minimum Requirements: Four years of full-time paid professional engineering experience in the use and application of the Los Angeles City Building Code, Planning and Zoning Code, and State regulations in areas such as, but not limited to, energy conservation, handicapped access, grading, zoning, and fire safety. Two years of this experience must be full-time paid experience at the level of Structural Engineering Associate.

Registration: A Building Civil Engineer must be registered as a Civil Engineer with the California State Board of Registration for Professional Engineers.

License: A valid California driver's license may be required.

Physical Requirements: A person in this class must be able to lift at least five pounds and sometimes over fifteen pounds. He/she must have good speaking and hearing abilities and good eyesight.

Persons with medical limitations may, with reasonable accommodations, be capable of performing the duties of some of the positions in this class. Such determination must be made on an individual basis in light of the person's limitations, the requirements of the position, and the appointing authority's ability to effect reasonable accommodations to the person's limitations.

As provided in Civil Service Commission Rule 2.5 and Section 4.55 of the Administrative Code, this specification is descriptive, explanatory, and not restrictive. It is not intended to declare what all of the duties and responsibilities of any position shall be.

City of Los Angeles

ASSISTANT DEPUTY SUPERINTENDENT OF BUILDING 4219

SALARY	$131,898.00 - $203,955.00 Annually	**LOCATION**	CITY OF LOS ANGELES, CA
JOB TYPE	FULL-TIME	**JOB NUMBER**	4219 P 2024/04/05 R
DEPARTMENT	Building & Safety	**OPENING DATE**	04/05/2024
CLOSING DATE	4/18/2024 11:59 PM Pacific		

DUTIES

ANNUAL SALARY

$131,898 to $192,847 and $139,499 to $203,955

NOTES:

1. Annual salary is at the start of the pay range. The current salary range is subject to change. Please confirm the starting salary with the hiring department before accepting a job offer.
2. Candidates from the eligible list are normally appointed to vacancies in the lower pay grade positions.

An Assistant Deputy Superintendent of Building plans, organizes and directs or assists in directing the activities of a bureau, division, or district office which is responsible for enforcement of City building, grading, zoning, mechanical, electrical, plumbing, elevator, and pressure vessel ordinances and State mandates such as disabled access and green regulations; the prevention, elimination and correction of hazardous substandard conditions in existing commercial, industrial and residential structures; or the administration of resource management support services. An Assistant Deputy Superintendent of Building also applies sound supervisory principles in the management and monitoring of subordinate supervisors and staff; effectively handles day-to-day operations and urgent matters; continuously enhances operations; fulfills equal employment opportunity responsibilities; and acts in the absence of the Deputy Superintendent of Building.

REQUIREMENT(S)/MINIMUM QUALIFICATION(S)

1. Four years of full-time paid experience with the City of Los Angeles in a class at the level of Building Civil Engineer, with responsibility for one or more of the following:
   a. Supervising the operations of plan check or building research units; or
   b. Supervising the operations of a grading, geology or soils unit; or
2. Eighteen months of full-time paid experience with the City of Los Angeles in a position at the level of Building Civil Engineer II: or
3. Three years of full-time paid experience in a class at the level of Principal Inspector with the City of Los Angeles, Department of Building and Safety, in any of the following inspection disciplines: building, building mechanical,

electrical, plumbing, heating and refrigeration, elevators, pressure vessels, or any combination thereof.

PROCESS NOTES

1. Applicants who lack six months or less of the required experience may file for this examination. However, they cannot be appointed until the full experience requirement is met.
2. Some positions may require a valid California driver's license. Candidates may not be eligible for appointment to these positions if their record within the last 36 months reflects three or more moving violations and/or at-fault accidents, or a conviction of a major moving violation (such as DUI).
3. Registration as a Civil, Electrical or Mechanical Engineer with the State Board of Registration for Professional Engineers may be required for some positions prior to appointment.
4. Some positions may require one of the following:

   a. ICC Certification as Combination Dwelling Inspector, Plumbing Inspector, Mechanical Inspector, Building Inspector, or Electrical Inspector, or as a plan examiner for Electrical, Mechanical, or Building Codes; **or**

   b. IAPMO certification as Plumbing Inspector or Mechanical Inspector; **or**

   c. National Fire Protection Association Certification (NFPA) as Electrical Inspector; **or**

   d. National Inspection Testing and Certification (NITC) as Fire Sprinkler Inspector; **or**

   e. Certified Competent Conveyance Inspector certification issued by the California Division of Occupational Safety and Health; **or**

   f. Certificate of Competency to inspect boiler and pressure vessels issued by the State of California; **or**

   g. National Board Commission from the National Board of Boiler and Pressure Vessel Inspectors; **or**

   h. CA Residential Combination Inspector Certified by ICC; **or**

   i. California Commercial Building Inspector certified by ICC; **or**

   j. Certified Electrical Inspector Master (CEI-M) certified by International Association of Electrical Inspectors (IAEI).

WHERE TO APPLY & APPLICATION DEADLINE

Applications will only be accepted on-line. **When you are viewing the on-line job bulletin of your choice, simply scroll to the top of the page and select the "Apply" icon.** On-line job bulletins are also available at https://www.governmentjobs.com/careers/lacity/promotionaljobs for Promotional Examinations.

NOTE:
Applicants are urged to apply early to ensure you have time to resolve any technical issues you may encounter.

Applications must be received by THURSDAY, APRIL 18, 2024

SELECTION PROCESS

Examination Weight:

Job Simulation Exercise. . . . . .Advisory
Interview 100%

The examination will consist of an on-line advisory job simulation exercise and an interview. In the interview, the following competencies may be evaluated: Judgment and Decision Making; Supervision; Interpersonal Skills; Written Communication; Process Improvement; Program Responsibility; Community Relations; Job Knowledge, including knowledge of: the principles related to land use, plan check, and permitting; materials used in construction as they relate to permits issued by the Department of Building and Safety for building, plumbing, electrical, pressure vessel, elevator, heating, ventilating, and air conditioning permits; inspection and investigation techniques, including field work policies

and procedures; Los Angeles City Building, Plumbing, Mechanical, Electrical, Elevator, and Green Codes; applicable county, State, and federal rules and regulations related to grading, zoning, heating, ventilation, air conditioning, fire life safety, refrigerating, and pressure vessel standards; legal implications involved in the enforcement of the various Codes administered by the Department of Building and Safety sufficient to defend the application of codes in the event of legal claims; programs related to the rehabilitation of substandard structure; and other necessary skills, knowledge, and abilities.

Additional job analysis information can be obtained by going to https://personnel.lacity.gov/jobs/job-analyses.cfm and clicking on Competencies under Assistant Deputy Superintendent of Building.

Prior to the interview, candidates will be required to complete an advisory job simulation exercise, which will consist of a written technical problem related to the duties and responsibilities of an Assistant Deputy Superintendent of Building. This job simulation exercise material will not be separately scored, but will be presented to the interview board for discussion with the candidate and for consideration in the overall evaluation of the candidate. Those who do not complete the advisory job simulation exercise will not be invited to the interview and will be considered to have failed the entire examination. To be considered complete, the advisory job simulation exercise must include a substantive response for each question or problem included in the advisory job simulation exercise for which a candidate is required to provide an answer. Please note that candidates must complete the advisory job simulation exercise and meet the minimum qualifications as stated on this bulletin in order to be considered further in the examination process.

The advisory job simulation exercise will be administered on-line. Candidates invited to participate in the examination will receive an e-mail from the City of Los Angeles outlining the specific steps on how to complete the on-line advisory job simulation exercise. Candidates will be required to complete the on-line advisory job simulation exercise between **MONDAY, MAY 13, 2024 and MONDAY, MAY 20, 2024.** Additional instructions will be sent via e-mail. Candidates who fail to complete the advisory job simulation exercise as instructed may be disqualified.

Candidates will be notified by e-mail of the date, time, and location of the interviews, which may be held in Los Angeles or on-line. It is anticipated that interviews will begin during the period of **JUNE 17, 2024 to JUNE 28, 2024**.

NOTES:

1. This examination is based on a validation study.
2. Appointment to this position is subject to a one-year probationary period as provided by Section 1011 of the Los Angeles City Charter.
3. As a covered entity under the Fair Employment and Housing Act and Title II of the Americans with Disabilities Act, the City of Los Angeles does not discriminate on the basis of disability and upon request, will provide reasonable accommodations to ensure equal access to its programs, services, and activities. To request a disability accommodation, please complete the Disability Accommodation Form within 14 calendar days of the submittal of the City application. The Disability Accommodation Form can be obtained at http://per.lacity.org/exams/verify_disability.pdf (Download PDF reader).
4. Applications are accepted subject to review to ensure that minimum qualifications are met. Candidates may be disqualified at any time if it is determined that they do not possess the minimum qualifications stated on this bulletin.
5. A final average score of 70% is required to be placed on the eligible list.
6. You must have received a regular appointment to a City position or be on a reserve list to file on a promotional basis.
7. Seniority credit at the rate of 0.10 of a point for each year of continuous City service in those City classes which provide qualifying experience for this position will be added to the weighted test score of each promotional

candidate. A maximum of one point will be added to the score of the candidate.

8. If in accordance with the Rule of Three Whole Scores all applicants are eligible for appointment consideration, the examination will consist entirely of an evaluation of candidates' City employment application by Personnel Department staff to ensure that the minimum qualifications have been met.
9. In accordance with Civil Service Rule, Sec. 4.24, review periods may be combined. Candidates in the examination process may file protests as provided in Sec. 4.20, 4.22, 4.23 as applicable and within the required timeframe; however, the Personnel Department may respond to and resolve protests prior to the establishment of the eligible list.

THIS EXAMINATION IS TO BE GIVEN ONLY
ON AN INTERDEPARTMENTAL PROMOTIONAL BASIS

The City of Los Angeles does not discriminate on the basis of race, religion, national origin, sex, age, marital status, sexual orientation, gender identity, gender expression, disability, creed, color, ancestry, medical condition (cancer), or Acquired Immune Deficiency Syndrome.

Employer
City of Los Angeles

Address
700 East Temple Street, Room 100

Los Angeles, California, 90012

Phone
213-473-9311

Website
http://per.lacity.org

ASSISTANT DEPUTY SUPERINTENDENT OF BUILDING 4219 Supplemental Questionnaire

*QUESTION 1

To be PROPERLY AND PROMPTLY notified of the status of my application, I UNDERSTAND that I MUST provide on my City application, the following information:

-Working E-mail address
-Telephone Number
-Official social security number

I UNDERSTAND that I MUST provide a working email address on my application where I will receive notifications regarding the status of my application and the selection process.

I UNDERSTAND that important information regarding the status of my application and the selection process will only be sent via E-MAIL to the email address I provided.

I UNDERSTAND that it is MY RESPONSIBILITY to ensure that the email address I provided is a working email and that I will check my email regularly to ensure I receive any communication as it relates to the examination promptly.

I UNDERSTAND that the City of Los Angeles Personnel Department is NOT RESPONSIBLE for any lost or redirected emails and that it is MY RESPONSIBILITY to add info@governmentjobs.com to my email contact list to avoid email

CITY OF LOS ANGELES – DEPARTMENT OF BUILDING AND SAFETY

CHIEF, CODE ENFORCEMENT BUREAU

(Deputy Superintendent of Building I)

This position is exempt from Civil Service*

Annual Salary: $138,184 – 196,606

Duties:

As a key senior management level position in Los Angeles Department of Building and Safety (LADBS), the Code Enforcement Bureau Chief reports directly to the General Manager and the Executive Officer. This position manages all of the operations of the Department's Code Enforcement Bureau (CEB) which is comprised of nearly 200 employees (including, inspectors, supervisors, managers and support staff). The CEB Chief is responsible for planning, directing and coordinating the activities of the Department's code enforcement functions designed to prevent and remove blight throughout the City which include, Vacant Building Abatement, Commercial and Residential Complaint and Referral, Sign Enforcement, Off-Site Sign Periodic Inspection Program, Annual Inspection Monitoring Program (AIM), Pro-Active Code Enforcement (PACE), and the Local Enforcement Agency that handles monitoring and enforcement of the City's landfills and transfer sites. The Bureau Chief is also responsible for preparing the operational budget, a variety of statistical reports and recommending bureau policies and solutions to problems.

Desires Qualifications:

Applicants should possess a minimum of one year of full time paid management experience equivalent to the level of Assistant Deputy Superintendent of Building in the City of Los Angeles and have been involved in code enforcement, inspection, building permit and/or plan check. Experience should include managing a large occupationally diverse staff in the planning, design, and implementation of work programs, budgets, financial strategies, policies, and procedures. The applicant should have knowledge and clear understanding of the Los Angeles Municipal Code pertaining to the Zoning Code, Building Code, etc. and other City Ordinances relating to private property land use.

Applicants for this position should demonstrate a thorough working knowledge of and experience with the principles, methods, and techniques required for the effective administration of a full service permitting, inspection and code enforcement program, including the following:

- The ability to optimize the utilization of personnel and other resources in accomplishing the Department's goals.
- Ability to rapidly assess an escalating and problematic situation and take actions to mitigate the risks to the Department/City and resolve the issues at hand. The ability to identify and analyze potential problems and develop innovative and practical solutions to problems.

- The ability to establish and maintain effective working relationships with a variety of elected officials, City departments, offices, bureaus, and Council offices, as well as outside agencies, organizations, and the public.

To Apply:

Electronic submittals are required. Interested applicants should immediately submit a resume, cover letter, and three work-related references (include name, job title, affiliation, and telephone number) to:

City of Los Angeles Personnel Department

Attn: Leonard Torres – Executive Recruitment

Email: per.execsearch@lacity.org

(Note: When e-mailing your application material, the subject line should reflect your Name and the Job Title you are applying for.)

Questions can be referred to Leonard Torres at (213) 473-9394 or Janell Ishii Hata at (213) 473-9393

In order to be considered, resumes must include:

- Position title and employment dates;
- Name of organization;
- Organization structure (narrative statement and organization chart showing the date, size, and scope of activities and functions for which you are/were responsible and the relationships of these activities and functions to other departments/bureaus/divisions within the organization);
- Brief description of your responsibilities, including program formulation and implementation; and operation control and direction; and
- Brief description of your management experience related to the above-stated Duties and Requirements.

APPLICATION DEADLINE

The filing period will close on
Friday, **September 9, 2016, at 4:00 p.m.**

Only the most qualified individuals will be invited to participate in the next phase of the selection process which will include in-person interviews and may include a brief writing exercise.

* This position is intended to be hired exempt from civil service meaning it is an at-will position. The incumbent will not accrue any civil service tenure, contractual employment rights or due process rights. The incumbent may be removed, without any finding of cause by the appointing authority. Such removal would not be reviewable or appealable.

Attachment B-2

KEN BERNSTEIN
Principal City Planner

Note: Most recent available as of 07/20/2025 from City Personnel Website

09-16-83

PRINCIPAL CITY PLANNER, 7946

Summary of Duties : Directs the work of a major division of the City Planning Department, and does related work.

Distinguishing Features : A Principal City Planner is responsible for directing all phases of activity in a major division in the Planning Department which includes several groups of professional, technical, and clerical employees. Under general direction an employee of this class plans, lays out, coordinates, and reviews the multiple facets of the work involved. A Principal City Planner normally receives assignments in terms of general objectives, and the completed work is evaluated on the basis of results obtained. An employee of this class represents the City at conferences and meetings with other jurisdictions and organizations concerned with the development, implementation and administration of the City general plan. Employees of this class may act for their supervisors when so designated.

Summary of Duties : Plans, lays out, directs, reviews, and coordinates the work of professional, technical and clerical employees in a major division of the City Planning Department; directs the preparation and maintenance of the City General Plan and specific plans for the future growth and development of the City, including data compilation and analysis, field surveys, citizen participation, environmental assessment, and identification and analysis of alter- natives, long, intermediate, and short-range plans for land use, circulation, recreation, schools, public facilities, environment and related elements; prepares or reviews reports and recommendations and submits them to the Director of Planning and the City Planning Commission for approval; assists in coordinating the programs and activities of a division with other divisions of the City Planning Department and those of other City departments and governmental agencies; presents and directs presentation of tentative plans at public meetings;

Directs office and field work required for the implementation of the City General Plan; directs, reviews, and coordinates the work of hearing examiners concerned with the holding of public hearings and making studies, and field work investigations and zoning matters including applications for changes of zone, specific plans, conditional uses, and building lines and supplemental use districts; reviews reports and recommendations of hearing examiners and other subordinates and presents them to the City Planning Commission; supervises the work of the Secretary City Planning Commission; directs the preparation of recommended changes in the zoningordinances and reports on emergency studies that require immediate action or recommendation; directs the review and approval of proposed locations and land acquistions for public buildings and facilities or for other public use, including streets and highways; may direct the work of branch offices giving information to, and accepting various

applications from the public; investigates and makes recommendations on unusually complex or difficult zoning matters.

Directs, coordinates, and reviews the development and application of mathematical models capable of being run in a computer and their possible utilization in a combined simulation of actual situations; directs the systems analysis, computer programming, and computer simulation of models; directs the systems design for data acquisition and implementation of an automated information base consisting of all the data necessary for the planning and operational functions of the Department, including the elements of establishment, maintenance, and use of a series of automated files covering a wide range of environmental, social, economic, and physical data within appropriate geographical identifications; directs research analysis necessary for comprehensive planning on such subjects as population and economic trends, land use, transportation, and social conditions, utilizing the latest economic and social research techniques, including the principles and techniques of operations research such as descriptive statistics, sampling, correlation and regression analysis, linear programming, and factor analysis;

Interviews and makes recommendations concerning the employment of professional City planning personnel; assists in preparation of the annual budget of the City Planning Department; directs the maintenance of records and the preparation of work programs for the division; acts for the City Planning Officer, Deputy Director of Planning, or Director of Planning during their absence as assigned; and may occasionally be assigned to other duties for training purposes to meet technological changes or emergencies.

Qualifications : A good knowledge of the principles, practices, techniques, and purposes of City planning and urban design including the development and maintenance of a comprehensive general plan and its legal implementation; a good knowledge of the planning process including the place of planning in the decision making process and the steps in the planning process; a good knowledge of the principles, techniques, and sources of information applicable to the collection, analysis, and presentation of data pertaining to City planning; a good knowledge of supervision and coordination as they relate to the direction of a planning function; a good knowledge of economic and social research and statistical techniques; a good knowledge of the principles of administration and organization relating to the direction of a major planning division; a good knowledge of physical City development, including theory of City form, land use, transportation, utilities, and shelter; a working knowledge of the techniques of systems analysis and operations research such as mathematical modeling and simulation, descriptive statistics, sampling, correlation and regression analysis, linear programming and factor analysis; a working knowledge of techniques in citizen participation; a working knowledge of environmental analysis and preparation of Environmental Impact Reports; a working knowledge of state and federal laws and procedures applicable to urban renewal; a

general knowledge of City personnel rules, employee relation laws, regulations, and policies; the ability to supervise the preparation of clear and concise reports, sound recommendations, and adequate supporting data and special exhibits; the ability to visualize and formulate general and specific plans; the ability to plan, direct, coordinate, and review the work of a group of pro- fessional, subprofessional, and clerical employees engaged in several different City planning operations; the ability to speak effectively before various groups and in presenting reports and recommendations to governmental agencies; and the ability to deal tactfully and effectively with staff, other department employees, personnel of other agencies, public officials, and the public.

Two years of experience as a Senior City Planner or in a class which is at least at that level in urban planning or zoning is required.

Appointment to this class is subject to a one-year probationary period as provided in Section 109 of the City Charter.

Physical Requirements : Strength to perform average lifting of less than 5 pounds and occasionally over 15 pounds; good speaking and hearing ability; and good eyesight.

Persons with certain handicaps may be capable of performing the duties of some of these positions. Such determination must be made by the medical examiner on an individual basis.

> As provided in Civil Service Commission Rule 2.5 and Section 4.55 of the Administrative Code, this specification is descriptive, explanatory and not restrictive. It is not intended to declare what the duties of any position shall be.

Attachment B-3

MINDY NGUYEN
Senior City Planner

Note: Most recent available as of 07/20/2025 from City Personnel Website

09-16-83

SENIOR CITY PLANNER, 7947

Summary of Duties : Supervises the work of a large specialized section engaged in professional City planning activities; and does related work.

Distinguishing Features : A Senior City Planner supervises the work of a large specialized section of the City Planning Department involved in a particular major phase of general plan, subdivision and parcel map, or zoning and public hearings work. Assignments usually outline general objectives and work is evaluated on results attained. Guidance is received through City Planning Commission requests and policies, and through conferences with, and instructions from supervisors. Employees of this class may act for their superiors in accordance with standing directives or as specifically assigned.

Examples of Duties : Supervises, plans, coordinates, and reviews the work of a large specialized section of the City Planning Department; reviews the development, preparation, and updating of long, intermediate, and short range zoning and other plans for the City as a whole and for smaller areas and districts; supervises investigations, public hearings, and report preparation on specific planning and zoning matters; supervises the preparation of reports, recommendations, maps, and special exhibits for presentation to the City Planning Commission, Board of Zoning Adjustments, City Council, and other governmental and civic organizations; reviews or supervises the review of proposed zone changes and variances, subdivisions, parcel and private street maps, and other matters for their effect on the City general plan; reviews and recommends approval of proposed locations and land acquisitions for public buildings and facilities or for other public use including streets and highways; supervises field and office work required to prepare land use studies and maps, central City studies, and general plans for the location of fire stations, schools, and recreation and other public facilities; supervises planning research activities which involve designing and implementing automated information systems and the use of color computer graphics equipment; assures that the work of the section is in agreement with the policies and interests of other sections and divisions of the department, acts for a Principal City Planner when so designated;

Represents the City Planning Department at conferences with other governmental agencies, City departments, and private organizations; speaks before civic, community, governmental, and professional groups to explain and advise on planning and zoning matters; participates in staff conferences; prepares preliminary section budget requests; maymake recommendations on the employment or promotion of professional and subprofessional personnel; and may occasionally be assigned to other duties for training purposes or to meet technological changes or emergencies.

Qualifications : A good knowledge of the principles, practices, techniques, and purposes of City planning and urban design including the development and maintenance of a comprehensive general plan and its legal implementation; a good knowledge of the planning process including how planning fits into decision making, and steps in the planning process; a good knowledge of citizen participation techniques; a good knowledge of legal background and tools of planning; a good knowledge of environmental assessment techniques and the preparation of Environmental Impact Reports; a good knowledge of the principles of supervision and coordination as they relate to the direction of a planning function; a good knowledge of safety principles and practices; a working knowledge of laws and regulations related to equal employment opportunity and affirmative action; a working knowledge of physical city development, including theory of City form, land use, transportation, utilities, and shelter; a good knowledge of computer and systems analysis applications to city planning operations research such as math models and simulation, decription statistics, sampling, correlation and regression analysis, linear programming and factor analysis; a working knowledge of human problems as they relate to planning; a general knowledge of state and federal laws and procedures applicable to urban renewal; a general knowledge of City personnel rules policies and procedures; a general knowledge of memoranda of understanding as they apply to subordinate personnel; the ability to supervise the preparation of clear and concise reports, sound recommendations, and adequate supporting data and special exhibits; ability to visualize and formulate general plans for City development in specific or general areas; ability to plan, direct, coordinate, and review the work of a group of professional, subprofessional, and clerical employees engaged in several different City planning operations; ability to speak effectively before professional and civic groups, public gatherings, and in presenting reports and recommendations to governmental agencies; and the ability to deal tactfully and effectively with personnel of other agencies, public officials, other employees and the public.

Two years of experience as a City Planner or in a class which is at least at that level in professional urban planning; or four years of experience as a City Planning Associate or in a class which is at least at that level in professional urban planning is required.

Physical Requirements : Strength to perform average lifting of less than five pounds and occasionally over 15 pounds; and good speaking and hearing ability.

Persons with handicaps may be capable of performing the duties of some of the positions in this class. Such determination must be made by the medical examiner on an individual basis.

As provided in Civil Service Commission Rule 2.5 and Section 4.55 of the Administrative Code, this specification is descriptive, explanatory and not restrictive. It is not intended to declare what the duties and responsibilities of any

position shall be.

Attachment B-4

MELISSA JONES
City Planner

Note: Most recent available as of 07/20/2025 from City Personnel Website

Form PDES 8

THE CITY OF LOS ANGELES

CIVIL SERVICE COMMISSION

CLASS SPECIFICATION

6/24/88 **CITY PLANNER, 7944**

Summary of Duties: Performs professional level planning work by researching, studying, surveying, illustrating and reporting on urban and community planning problems; performs complex City planning work involving the preparation of studies, research and reports in the areas of community planning work involving the preparation of studies, research and reports in the areas of community planning, City-wide planning, environmental planning, transportation planning, and land use administration and zoning administration; plans, supervises, coordinates, and reviews such work; and does related work.

Distinguishing Features: A City Planner performs responsible professional city planning work and exercises considerable independent judgment and discretion in supervising small groups of professional and sub professional City planning employees working on specific phases of plan effectuation or ajar segments of general planning. An employee of this class may report to a Senior City Planner, and Associate Zoning Administrator, or a Principal City Planner. The work is assigned in general terms that outline the type of project and the desired general characteristics. An employee of this class is responsible for the technical and professional soundness of the results. The work is reviewed for adherence to objectives and policies and the soundness of the recommendations.

Example of Duties:

- Plans, supervises, coordinates, and reviews the work of a unit engaged in a particular phase of general plan or plan effectuation work;
- Supervises office and field work required to study, recommend changes and conditions and approve subdivision and tract maps filed with the City Planning Department;
- Personally prepares reports of more difficult or unusual projects;
- Makes field and office investigations, conducts public hearings, and prepares reports on requests for changes in zoning, conditional use requests, and the establishment of private streets and building lines;
- Oversees the operation of design review boards;
- Supervises the preparation of reports and recommendations on the review and approval of proposed locations and land acquisitions for public buildings and facilities;
- Supervises fields and office work required to prepare land use studies, supporting data and maps, General Plan elements, specific plans, special district studies, and special area studies;
- Supervises the preparation of reports, recommendations, maps, and special exhibits for presentation to the City Planning Commission and other governmental and civic organizations;
- Supervises a branch office of the City Planning Department;
- Advises and assists applicants for zone variances and conditional uses, particularly in the

case of citizens referred by the Department of Building and Safety;
- Provides planning ad zoning information of all kinds to subdivides, builders, property owners, other City departments, and the public;
- Represents the City Planning Department at conferences with other City departments, governmental agencies, and organizations;
- Speaks to civic, community, governmental, and professional groups to explain planning, zoning and urban design matters;
- Makes recommendations on the employment or promotion of professional and sub professional personnel;
- Supervises the maintenance of maps and records;
- Fulfills supervisory responsibilities as set forth in the City's Affirmative Action Plan;
-
- May occasionally be assigned to other duties for training purposes or to meet technological changes or emergencies.

Qualifications

Knowledge of:

A good knowledge of:
- Principles, practices, techniques, and purposes of city planning;
- Principles and techniques involved in the development and maintenance of a comprehensive general city plan;
- Principles, techniques, and sources of information applicable to the collection, compilation, analysis, and presentation of data pertaining to city and general planning;
- Local, State, and Federal Laws, City Charter provisions, court cases and legal precedents relating to planning, urban renewal and redevelopment;
- Principles and techniques of personnel management, supervision, and organization applicable to supervising a group of professional, sub professional, and clerical employees.

A working knowledge of:
- Accepted practices and local and applicable State laws relating to zoning, land subdivision and control, and land use;
- Current trends in local, State, and Federal planning and legislation affecting city planning;
- Safety principles and practices:
- Accepted standards for locating streets and highways, recreational, educational, protective, and other public facilities, and industrial, commercial and residential areas;
- Principles and practices of civil and transportation engineering, architecture, landscape architecture, urban design, and municipal administration applicable to city and general planning;
- Terminology, principles, techniques, and sources of information applicable to the collection, compilation of plans and presentations for urban renewal and redevelopment projects;
- Organization of the City and the functions of its various departments;
- Laws and regulations related to equal employment opportunity and affirmative action;

- City personnel rules, policies and procedures.

Ability to:

- Maintain cooperative relationships with other City departments, governmental agencies, and civic and professional organizations;
- Deal tactfully and effectively with personnel of other agencies, public officials, other employees, and the public;
- Conduct field surveys and investigations;
- Plan, coordinate, supervise, and conduct field surveys and investigations;
- Collect, interpret, and analyze data pertinent to city planning and to prepare clear and concise reports;
- Understand, interpret and apply socioeconomic data;
- Supervise or personally perform the collection, interpretation, and analysis of data pertinent to city planning and prepare clear and concise reports, sound recommendations, and adequate data and special exhibits;
- Formulate general plans for City development in specific or general areas;
- Supervise a small number of professional and sub professional employees;
- Conduct public hearings which may involve complex problems and conflicting interests;
- Speak clearly, forcefully, and effectively before professional and civic groups, public gatherings, and in presenting reports and recommendations to governmental agencies.

Requirements: Two years of full-time paid professional experience as a City Planning Associate or in a position which is at least at that level and which has provided two years of full-time paid professional experience in urban planning or zoning is required.

One year of graduate study in urban planning or a closely related field with completion of at least 24 semester units or 36-quarter units, or registration as a landscape architect or architect may be substituted for up to one year of the required experience.

License: A valid California driver's license and good driving record may be required.

Physical Requirements: Strength to perform average lifting of less than 5 pounds and occasionally over 15 pounds; arm and hand dexterity necessary to use drafting instruments; good speaking and hearing ability; and good eyesight, including normal color perception.

Persons with disabilities may be able to perform the essential duties of this class with reasonable accommodation. Reasonable accommodation will be evaluated on an individual basis and depend, in part, on the specific requirements for the job, the limitations related to the disability, and the ability of the hiring department to reasonably accommodate the limitations.

As provided in Civil Service Commission Rule 2.5 and Section 4.55 of the Administrative Code, this specification is descriptive, explanatory and not restrictive. It is not intended to declare what all of the duties,

responsibilities, and required qualifications of any position shall be.

Attachment C

Email Communications

Attachment C-1

Email Communication

09-11-2024

Faruk Sezer, Building Civil Engineer

Re: Time Sensitive ... ENV-2019-6645-EIR; 11973 San Vicente Boulevard Project; Proposed Demolition of The Barry Building Historical Cultural Monument (HCM) #887 ...

From: Faruk Sezer (faruk.sezer@lacity.org)

To: ziggykruse2005@yahoo.com

Date: Wednesday, September 11, 2024 at 09:32 AM PDT

Hi Ziggy,

The Planning Commission held a meeting last Thursday, and we are now awaiting their determination or recommendation letter. We expect this letter to be issued either this week or early next week. Once we receive the letter, the Los Angeles Department of Building and Safety (LADBS) will begin the process of certifying the Environmental Impact Report (EIR).

The format of this certification is still undecided, as LADBS has not issued one in the past. We will need to determine whether it will be a formal document that I act upon or a letter signed by upper management. After the Planning Commission's letter is issued, I will coordinate with our city attorney and the city planning attorney to understand the correct format for certifying the EIR. This certification is the first part of the process.

Once the EIR is certified, the applicant must seek clearance approval. The Planning Department typically has a six-month timeframe to act on this clearance. Approval of the Statement of overriding will occur later as a the second part, after the Planning Department has acted on the clearance. Additionally, keep in mind that the Planning Commission may request an additional six-month period through the City Council to act on the clearance.

In addition to historic clearance we are planning to add another clearance for " approval of statement of overriding" so that we can act on it(approve or deny) and an applicant has means to appeal the decision of LADBS.If " approval of statement of overriding" clerance is denied by LADBS then you can appeal it through LADBS Board of Building and Safety commision for our decision.

Thank you.

***I will be out of office on every other MONDAY;
*****We strive to answer all emails within 48 hours.**

Faruk Sezer, MS, PE, CASp, I.C.C
Building Civil Engineer
Government and Community Relations
Los Angeles Department of Building and Safety
201 N. Figueroa St. Room 1080A
Los Angeles, CA 90012
213.482.0093
For general Zoning and Building code questions, please refer to our call center - 311 or (213) 473-3231. Also, for additional information you may visit our website at: LADBS.org and Continuity of Operations for LADBS

> On Mon, Sep 9, 2024 at 10:29 PM Ziggy Kruse <ziggykruse2005@yahoo.com> wrote:
>
> Hello Mr. Sezer:
>
> This is a quick follow up to our email to you from Friday, September 6, 2024. That email is part of this email communication.
>
> Mindy Nguyen from Planning told us that you will be the person

Certifying the EIR and Adopting the Statement of Overriding Considerations (SOC) for the Barry Building Demolition Project Case No. ENV-2019-6645-EIR.

In addition to timely notification of each event, please also provide a time-line of the same events for the Barry Building:

- **Certification of the EIR:** When will the EIR be certified?
- **Adoption of Statement of Overriding Considerations:** When will the Statement of Overriding Considerations be adopted?
- **Notice of Determination (NOD):** for Certification of the EIR. When will the NOD be issued?
- **Project Approval:** When will the project be approved?
- **Clearance of the Demolition Permit:** When will all the clearances be issued for the Demolition Permit? And what are the outstanding clearances?
- **LADBS Board Hearing:** Will this item be scheduled for a LADBS Board of Commissioners meeting and if so when? Will the LADBS Board also be approving the SOC?
- **What is the timeline for people to appeal the certification of the EIR?**
- **Cultural Heritage Commission (CHC):** Will the Barry Building Demolition Project go back to CHC? And if so: When will that be?

Since this is a time sensitive matter, timely answers to these questions will be appreciated as we do not want to miss any deadlines to exhaust our administrative remedies .

Please provide a response from you by no later than the end of day on Wednesday, September 11, 2024.

Thank you.

Sincerely,
Ziggy and Robert Blue

----- Forwarded Message -----
From: Bob Blue <bob.blue@live.com>
To: Faruk Sezer <faruk.sezer@lacity.org>
Cc: Ziggy Kruse <ziggykruse2005@yahoo.com>; Corin L Kahn, Esq. <clkesq@outlook.com>; veronica.lopez@lacity.org <veronica.lopez@lacity.org>; Mindy Nguyen <mindy.nguyen@lacity.org>; Melissa Jones <melissa.jones@lacity.org>; Hydee Feldstein-Soto <hydee.feldsteinsoto@lacity.org>
Sent: Friday, September 6, 2024 at 07:26:23 PM PDT
Subject: Case No: ENV-2019-6645-EIR; 11973 San Vicente Boulevard Project; Proposed Demolition of The Barry Building Historical Cultural Monument (HCM) #887

Subject: Case No: ENV-2019-6645-EIR
11973 San Vicente Boulevard Project
Proposed Demolition of The Barry Building, Historical Cultural Monument (HCM) #887

Hello Mr. Sezer,

Welcome back from your time off.

This email is in regard to case # **ENV-2019-6645-EIR**, the proposed demolition of The Barry Building HCM #887.

Please provide the requested notification for the actions listed below no later than one business day after the date of each action taken by LABDS:

- **Certification of the EIR**
- **Notice of Determination (NOD)** for Certification of the EIR
- **Project Approval**
- **Adoption of Statement of Overriding Considerations**
- **Clearance of the Demolition Permit**

Please send these notifications to:

Corin L. Kahn,Esq: clkesq@outlook.com

Ziggy Kruse Blue: ziggykruse2005@yahoo.com

Robert Blue: bob.blue@live.com

Please let me know that you have received this email and that you will add us to the list for interested persons regarding the above.

Thank you,
Robert Blue

Attachment C-2

Email Communication

06-30-2025

Veronica Lopez, LADBS Board Secretary

Re: TIME SENSITIVE ... Requesting your Assistance regarding LADBS' Appeals Form "INFORMATION BULLETIN / PUBLIC – BUILDING CODE REFERENCE NO.: Effective: 01-01-2023 DOCUMENT NO.: P/BC 2023-149"

From: Veronica Lopez (veronica.lopez@lacity.org)

To: ziggykruse2005@yahoo.com

Cc: bob.blue@live.com

Date: Monday, June 30, 2025 at 05:02 PM PDT

Good Afternoon Ziggy,

My phone's voicemail system has not been working for some time. I have notified our Technical Service Bureau and they are working on it. It appears to be a City wide issue.

Unfortunately, I do not have an example I can share as your appeal is the first of its kind.

The "Request for Modification of Building Ordinance" is the correct form for appeals. You must first complete page 1 of this form and provide supporting documents. The Department will then make the determination to grant, grant with conditions or deny the appeal.

You may appeal the Department determination to the Board of Building and Safety Commission. If you choose to, LADBS staff will charge Board fees on page 2 of this form and ask that you complete the "Supplemental Application for Appeals"
form and provide an appeal brief.

The code section you are appealing is LABC section 106.4.5. Refer to the attachment.

Please let me know if additional assistance is needed.

Regards,

Veronica Lopez
Department of Building & Safety, City of Los Angeles
Commission Office - Board Secretary
Structural Engineering Associate
201 N. Figueroa St., Room 1030
Los Angeles, CA 90012
(213) 482-7429

Please note my Regular-Day-Off (RDO) is every other Friday.

For general Zoning and Building code questions, please refer to our call center at 311 or (213) 473-3231 to speak with an LADBS Call Center Engineer. Also, for additional information you may visit our website at dbs.lacity.gov

> On Mon, Jun 30, 2025 at 4:19 PM Ziggy Kruse <ziggykruse2005@yahoo.com> wrote:
>
> Hello Veronica:
>
> I hope that you are doing well and that you are ready to embrace the upcoming long weekend.

Also, I've tried reaching you by phone, but it just kept on ringing and never went anywhere, not even a voicemail.

Please provide an example of a filled out APPEAL FORM that we can use as a template for the Appeal of the 06-06-2025 Letter of Determination (LOD) from the Los Angeles Department of Building and Safety. I would like to receive this example by either end of day today, but no later than tomorrow 1:00 PM.

I am only asking for a "rush" response since the form that was provided as Attachment "B" with the LOD (dated 06-06-2025) does not appear to be appropriate for the Appeal. (see attached)

However, if there has been an appeal already filed for either this case, or any previous case related to LADBS certifying an EIR, please provide a copy of that filled out Appeal form.

Otherwise, please help us fill out the form so that it can be included with the Appeal before the looming deadline is passed.

I thank you in advance for your assistance regarding this time sensitive matter.

Sincerely,
Ziggy



section 106.4.5.pdf
181.5 kB

Email Communication

07-02-2025

Veronica Lopez, LADBS Board Secretary

Re: TIME SENSITIVE ... Requesting your Assistance regarding LADBS' Appeals Form "INFORMATION BULLETIN / PUBLIC – BUILDING CODE REFERENCE NO.: Effective: 01-01-2023 DOCUMENT NO.: P/BC 2023-149"

From: Veronica Lopez (veronica.lopez@lacity.org)

To: ziggykruse2005@yahoo.com

Cc: bob.blue@live.com

Date: Wednesday, July 2, 2025 at 02:25 PM PDT

Hi Ziggy,

I understand the urgency and hope to have an answer for you today.

Best,

Veronica Lopez
Department of Building & Safety, City of Los Angeles
Commission Office - Board Secretary
Structural Engineering Associate
201 N. Figueroa St., Room 1030
Los Angeles, CA 90012
(213) 482-7429

Please note my Regular-Day-Off (RDO) is every other Friday.

For general Zoning and Building code questions, please refer to our call center at 311 or (213) 473-3231 to speak with an LADBS Call Center Engineer. Also, for additional information you may visit our website at dbs.lacity.gov

> On Wed, Jul 2, 2025 at 2:19 PM Ziggy Kruse <ziggykruse2005@yahoo.com> wrote:
>
> Hello Veronica:
>
> I am sorry for being so insistent on this, but considering that tomorrow is a "short" day for many employees in the City of LA as well as other offices, and Friday is a holiday (Fourth of July), I would like to receive the answer regarding the deadline to file the appeal as soon as possible.
>
> Thank you again for your help.
>
> Sincerely,
> Ziggy
>
> On Wednesday, July 2, 2025 at 11:19:30 AM PDT, Ziggy Kruse <ziggykruse2005@yahoo.com> wrote:
>
> Hello Veronica:

Thank you for staying on top of this. I will keep an eye out for your email.

Sincerely,
Ziggy

On Wednesday, July 2, 2025 at 10:42:11 AM PDT, Veronica Lopez <veronica.lopez@lacity.org> wrote:

Good Morning Ziggy,

I will confirm with Mr. Binh Phan who issued the determination letter and get back to you shortly.

Regards,

Veronica Lopez
Department of Building & Safety, City of Los Angeles
Commission Office - Board Secretary
Structural Engineering Associate
201 N. Figueroa St., Room 1030
Los Angeles, CA 90012
(213) 482-7429

Please note my Regular-Day-Off (RDO) is every other Friday.

For general Zoning and Building code questions, please refer to our call center at 311 or (213) 473-3231 to speak with an LADBS Call Center Engineer. Also, for additional information you may visit our website at dbs.lacity.gov

On Wed, Jul 2, 2025 at 10:12 AM Ziggy Kruse <ziggykruse2005@yahoo.com> wrote:

> Hello Veronica:
>
> Thank you very much for your thorough response to my questions.
>
> Based on your statement, the public has until **July 11, 2025** to file the appeal? Is that correct?
>
> Please confirm as soon as possible. Thank you.
>
> Sincerely,
> Ziggy
>
> On Tuesday, July 1, 2025 at 07:46:24 AM PDT, Veronica Lopez <veronica.lopez@lacity.org> wrote:
>
> Good Morning Ziggy,
>
> See responses below:
>
> 1. The appeal to be filed, using the form provided with LADBS's 06-06-2025 LOD goes to the DEPARTMENT and not the Commissioners.
> Correct.

2. We only have to worry about the first of the form, but not fill out any subsequent pages, correct?
   Correct.

3. Once the DEPARTMENT makes its determination (one way or another), then the next appeal will go to the Board of Commissioners.
   Correct.

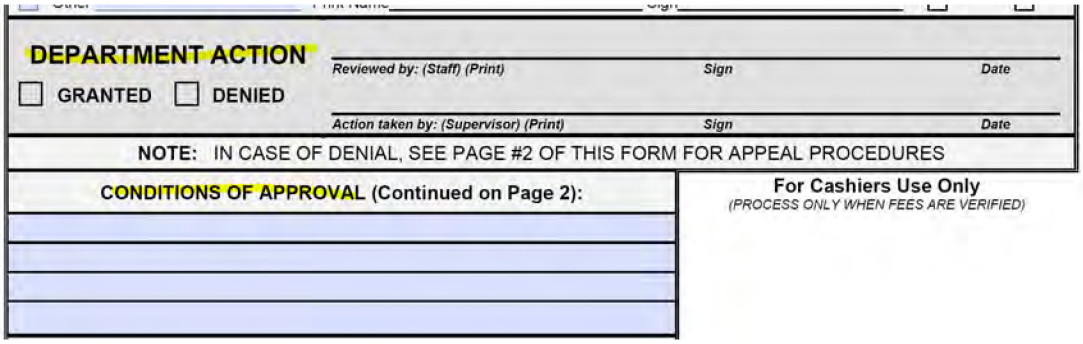
4. This brings me to this question:
   a. Do we have to file it again with all of the same supporting documents?
   b. Or will the department forward the appeal and tell us how much the fee is?

No, you do not need to file a new appeal. The Department will collect the Board fees on page 2, collect any additional supporting documents, ask you to complete the "Supplemental Application for Appeals" and forward the entire appeal package to the Commission Office.

5. The next questions that come with this truly new conundrum:
   a. Who in the Department will review the appeal?
   b. How long is the "review" period for Staff?
   c. Will the determination be provided in writing and HOW LONG does the appellant have to now continue with the Appeal to the Board of Commissioners?

The Permit and Engineering Bureau (PEB) will review the appeal and act on page 1 of the appeal form. Kindly email me your documents and I will forward them to the appropriate staff.

The length of the "review" period depends on the complexity of the appeal brief. The Department will not be providing a determination in writing, they will simply complete the "Department Action" & "conditions of approval" portion of the appeal form. Refer to image below:



You have 35 days from the date on the LOD to appeal the Department's determination to the Board.

Please let me know if you have any additional questions.

Thank you,

Veronica Lopez
Department of Building & Safety, City of Los Angeles
Commission Office - Board Secretary
Structural Engineering Associate
201 N. Figueroa St., Room 1030
Los Angeles, CA 90012
(213) 482-7429

Please note my Regular-Day-Off (RDO) is every other Friday.

For general Zoning and Building code questions, please refer to our call center at 311 or (213) 473-3231 to

speak with an LADBS Call Center Engineer. Also, for additional information you may visit our website at dbs.lacity.gov

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Hello Veronica:

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Thank you again for your continued assistance with this.

Sincerely,
Ziggy

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The "Request for Modification of Building Ordinance" is the correct form for appeals. You must first complete page 1 of this form and provide supporting documents. The Department will then make the determination to grant, grant with conditions or deny the appeal.

You may appeal the Department determination to the Board of Building and Safety Commission. If you choose to, LADBS staff will charge Board fees on page 2 of this form and ask that you complete the "Supplemental Application for Appeals"
form and provide an appeal brief.

The code section you are appealing is LABC section 106.4.5. Refer to the attachment.

Please let me know if additional assistance is needed.

Regards,

Veronica Lopez
Department of Building & Safety, City of Los Angeles
Commission Office - Board Secretary
Structural Engineering Associate
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Also, I've tried reaching you by phone, but it just kept on ringing and never went anywhere, not even a voicemail.

Please provide an example of a filled out APPEAL FORM that we can use as a template for the Appeal of the 06-06-2025 Letter of Determination (LOD) from the Los Angeles Department of Building and Safety. I would like to receive this example by either end of day today, but no later than tomorrow 1:00 PM.

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Otherwise, please help us fill out the form so that it can be included with the Appeal before the looming deadline is passed.

I thank you in advance for your assistance regarding this time sensitive matter.

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Email Communication

07-02-2025

Veronica Lopez, LADBS Board Secretary

Re: TIME SENSITIVE ... Requesting your Assistance regarding LADBS' Appeals Form "INFORMATION BULLETIN / PUBLIC – BUILDING CODE REFERENCE NO.: Effective: 01-01-2023 DOCUMENT NO.: P/BC 2023-149"

From: Veronica Lopez (veronica.lopez@lacity.org)

To: ziggykruse2005@yahoo.com

Cc: bob.blue@live.com

Date: Wednesday, July 2, 2025 at 03:23 PM PDT

Hi Ziggy,

It has been confirmed that you have until July 11th to file your appeal to the Board. Please note, this means you must pay the Board fees by this date.

Please let me know if you have any additional questions.

Thank you,

Veronica Lopez
Department of Building & Safety, City of Los Angeles
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> I understand the urgency and hope to have an answer for you today.
>
> Best,
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> Good Morning Ziggy,
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> Regards,
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   Correct.

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   No, you do not need to file a new appeal. The Department will collect the Board fees on page 2, collect any additional supporting documents, ask you to complete the "Supplemental Application for Appeals" and forward the entire appeal package to the Commission Office.

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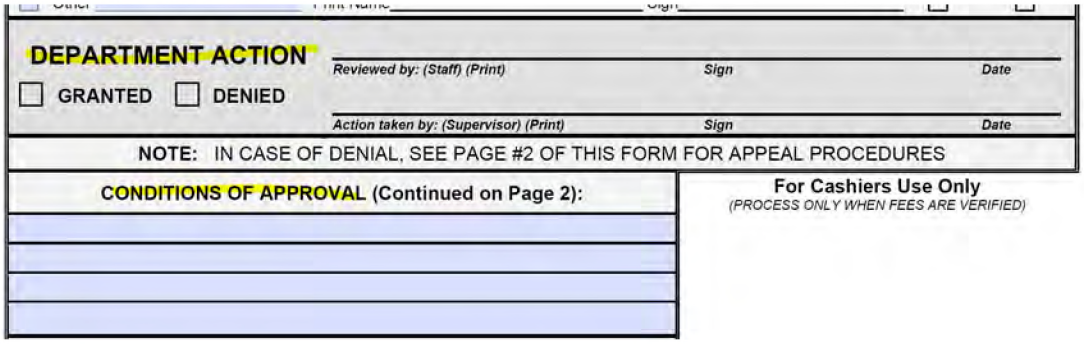

DEPARTMENT ACTION

☐ GRANTED ☐ DENIED

Reviewed by: (Staff) (Print) *Sign* *Date*

Action taken by: (Supervisor) (Print) *Sign* *Date*

NOTE: IN CASE OF DENIAL, SEE PAGE #2 OF THIS FORM FOR APPEAL PROCEDURES

CONDITIONS OF APPROVAL (Continued on Page 2):

For Cashiers Use Only
(PROCESS ONLY WHEN FEES ARE VERIFIED)

You have 35 days from the date on the LOD to appeal the Department's determination to the Board.

Please let me know if you have any additional questions.

Thank you,

Veronica Lopez
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Email Communication

07-02-2025

Veronica Lopez, LADBS Board Secretary

Re: TIME SENSITIVE ... Requesting your Assistance regarding LADBS' Appeals Form "INFORMATION BULLETIN / PUBLIC – BUILDING CODE REFERENCE NO.: Effective: 01-01-2023 DOCUMENT NO.: P/BC 2023-149"

From: Veronica Lopez (veronica.lopez@lacity.org)

To: ziggykruse2005@yahoo.com

Cc: bob.blue@live.com

Date: Wednesday, July 2, 2025 at 05:15 PM PDT

Hi Ziggy,

My sincere apology if I have confused you. The appeal is a 2 part process. The first is the appeal to the department and 2nd is the board appeal that goes to the Commission. You must first appeal to the Department, if you are dissatisfied
with their determination, you can then appeal to the Board. Per the determination letter, it is this appeal that has the 35 day timeline.

You can file both appeals on July 11th if you prefer. What I was recommending was only a suggestion.

I will be taking a vacation day tomorrow and the City is closed on July 4th. I do not have any other planned vacation time.

Regards,

Veronica Lopez
Department of Building & Safety, City of Los Angeles
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> On Wed, Jul 2, 2025 at 4:55 PM Ziggy Kruse <ziggykruse2005@yahoo.com> wrote:
>
> Hello Veronica:
>
> Thank you for the follow up.
>
> However, this is getting very confusing.
>
> Based on your email from today, is it now to be understood that the Appeal is due much sooner than July 11, 2025?
>
> In your 07/01/2025 email you stated that the appeal must be first filed

with the **Department and not the commission.** You also stated that we have 35-days from the **date on the LOD** to do so.

After Staff makes its determination the Appeal will go to the Commissioners.

The following questions are based on the Date on the LOD (06-06-2025):

If the Appeal (page 1 of the Form) and any supporting documents is emailed to you on July 11, 2025, how long will it take you to provide us with an invoice to pay the fee?

Based on your email from today, is it now to be understood that the Appeal is due much sooner than July 11, 2025?

If that is the case, then the public has been misled and given conflicting information throughout the entire process regarding filing an appeal.

Lastly, please let us know what days you will be in the office leading up to July 11, 2025.

Looking forward to hearing back from you soon.

Sincerely,
Ziggy and Bob

On Wednesday, July 2, 2025 at 04:30:44 PM PDT, Veronica Lopez <veronica.lopez@lacity.org> wrote:

Bob,

To meet the 35 days to file a Board appeal, the payment for the Board fees must be received by July 11th. I would suggest you submit as soon as possible to allow time for staff to review and process the department appeal, process the Board appeal and to avoid any possible hiccup.

Best,

Veronica Lopez
Department of Building & Safety, City of Los Angeles
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On Wed, Jul 2, 2025 at 4:17 PM Bob Blue <bob.blue@live.com> wrote:

> Hello again Veronica,
>
> Based on the information you provided earlier, we were planning on submitting the package to you on July 11, 2025 to comply with the 35-days.
>
> Are we supposed to shorten the time of 35 days to file the appeal?
>
> Thank you,
> Bob & Ziggy

From: Veronica Lopez <veronica.lopez@lacity.org>
Sent: Wednesday, July 2, 2025 4:10 PM
To: Bob Blue <bob.blue@live.com>
Cc: Ziggy Kruse <ziggykruse2005@yahoo.com>
Subject: Re: TIME SENSITIVE ... Requesting your Assistance regarding LADBS' Appeals Form "INFORMATION BULLETIN / PUBLIC – BUILDING CODE REFERENCE NO.: Effective: 01-01-2023 DOCUMENT NO.: P/BC 2023-149"

Good Afternoon Bob,

Once the appeal forms are provided. I will email them to the Permit and Engineering Bureau for processing. They will determine the fees and email you a payment link.
When I send them the forms, I will be sure to notify them of the tight appeal timeline. When do you anticipate submitting?

Regards,

Veronica Lopez
Department of Building & Safety, City of Los Angeles
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On Wed, Jul 2, 2025 at 3:51 PM Bob Blue <bob.blue@live.com> wrote:

> Hello Veronica,
>
> Thank you. And yes, we do have additional questions.
>
> Once we email you the appeal, how long does it take for us to be presented with an invoice to pay the fees?

And how will we be notified of the availability of the invoice so that we can pay it electronically?

Thank you,
Bob & Ziggy

From: Veronica Lopez <veronica.lopez@lacity.org>
Sent: Wednesday, July 2, 2025 3:23 PM
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Hi Ziggy,

It has been confirmed that you have until July 11th to file your appeal to the Board. Please note, this means you must pay the Board fees by this date.

Please let me know if you have any additional questions.

Thank you,

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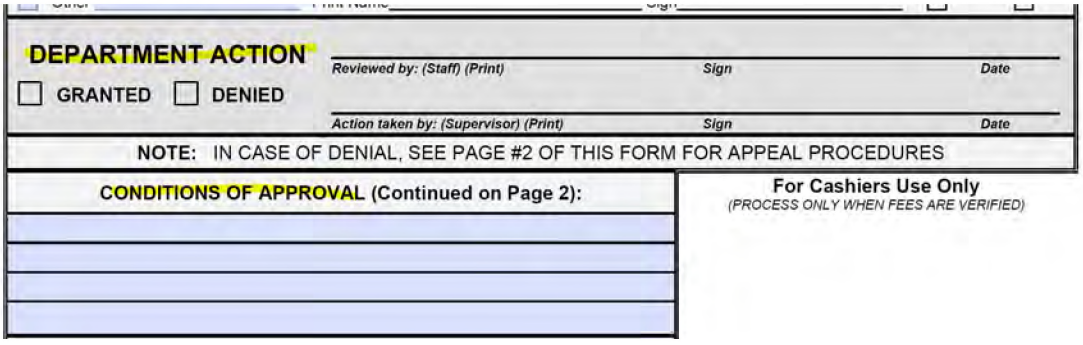

DEPARTMENT ACTION

☐ GRANTED ☐ DENIED

Reviewed by: (Staff) (Print) *Sign* *Date*

Action taken by: (Supervisor) (Print) *Sign* *Date*

NOTE: IN CASE OF DENIAL, SEE PAGE #2 OF THIS FORM FOR APPEAL PROCEDURES

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I was really hoping that there is an example “floating” around somewhere.

So, please correct me if I misunderstood something, but based on your email this is the line up of the next steps:

1. The appeal to be filed, using the form provided with LADBS’s 06-06-2025 LOD goes to the DEPARTMENT and not the Commissioners.

2. We only have to worry about the first of the form, but not fill out any subsequent pages, correct?

3. Once the DEPARTMENT makes its determination (one way or another), then the next appeal will go to the Board of Commissioners.

4. This brings me to this question:
    a. Do we have to file it again with all of the same supporting documents?

    b. Or will the department forward the appeal and tell us how much the fee is?

5. The next questions that come with this truly new conundrum:
    a. Who in the Department will review the appeal?

    b. How long is the “review” period for Staff?

    c. Will the determination be provided in writing and HOW LONG does the appellant have to now continue with the Appeal to the Board of Commissioners?

I am sure that there are more questions to come, but considering that this is a Brand New Type of Appeal with

a deadline approaching, these questions need to be answered as soon as possible.

Thank you again for your continued assistance with this.

Sincerely,
Ziggy

On Monday, June 30, 2025 at 05:02:42 PM PDT, Veronica Lopez <veronica.lopez@lacity.org> wrote:

Good Afternoon Ziggy,

My phone's voicemail system has not been working for some time. I have notified our Technical Service Bureau and they are working on it. It appears to be a City wide issue.

Unfortunately, I do not have an example I can share as your appeal is the first of its kind.

The "Request for Modification of Building Ordinance" is the correct form for appeals. You must first complete page 1 of this form and provide supporting documents. The Department will then make the determination to grant, grant with conditions or deny the appeal.

You may appeal the Department determination to the Board of Building and Safety Commission. If you choose to, LADBS staff will charge Board fees on page 2 of this form and ask that you complete the "Supplemental Application for Appeals" form and provide an appeal brief.

The code section you are appealing is LABC section 106.4.5. Refer to the attachment.

Please let me know if additional assistance is needed.

Regards,

Veronica Lopez
Department of Building & Safety, City of Los Angeles
Commission Office - Board Secretary
Structural Engineering Associate
201 N. Figueroa St., Room 1030
Los Angeles, CA 90012
(213) 482-7429

Please note my Regular-Day-Off (RDO) is every other Friday.

For general Zoning and Building code questions, please refer to our call center at 311 or (213) 473-3231 to speak with an LADBS Call Center Engineer. Also, for additional information you may visit our website at dbs.lacity.gov

On Mon, Jun 30, 2025 at 4:19 PM Ziggy Kruse <ziggykruse2005@yahoo.com> wrote:

> Hello Veronica:
>
> I hope that you are doing well and that you are

ready to embrace the upcoming long weekend.

Also, I've tried reaching you by phone, but it just kept on ringing and never went anywhere, not even a voicemail.

Please provide an example of a filled out APPEAL FORM that we can use as a template for the Appeal of the 06-06-2025 Letter of Determination (LOD) from the Los Angeles Department of Building and Safety. I would like to receive this example by either end of day today, but no later than tomorrow 1:00 PM.

I am only asking for a "rush" response since the form that was provided as Attachment "B" with the LOD (dated 06-06-2025) does not appear to be appropriate for the Appeal. (see attached)

However, if there has been an appeal already filed for either this case, or any previous case related to LADBS certifying an EIR, please provide a copy of that filled out Appeal form.

Otherwise, please help us fill out the form so that it can be included with the Appeal before the looming deadline is passed.

I thank you in advance for your assistance regarding this time sensitive matter.

Sincerely,
Ziggy

Attachment C-3

Email Communication

06-12-2025

Faruk Sezer, Building Civil Engineer

Outlook

Re: TIME SENSITIVE QUESTIONS ... Letter of Determination for the Demolition of the Building located at 11973 San Vicente Boulevard (Historic-Cultural Monument No. LA-887)

From Faruk Sezer <faruk.sezer@lacity.org>
Date Thu 6/12/2025 5:00 PM
To Ziggy Kruse <ziggykruse2005@yahoo.com>
Cc Bob Blue <bob.blue@live.com>; Hydee Feldstein-Soto <hydee.feldsteinsoto@lacity.org>

HI Ziggy,
Please see my responses below in red.

1. 1. **Timeline for Appeal of the Decision made by you and your office**
    a. **When does the Appeal period start**
    June 4, 2025
    b. **When does the Appeal period end**
    July 9, 2025

2. **What is the difference between the "Appeal to Board of Building & Safety Commissioners" and "CEQA Appeal"?**
   Appeal to the Board of Building and Safety Commissioners is an appeal to the Board of the DBS determination on the EIR, EIR findings and statement of overriding consideration. A "CEQA Appeal" refers to an appeal to the City Council of a decision of the Board and may only be taken if the Board upholds the decision of DBS certifying the EIR, adopting EIR findings, and adopting a statement of overriding considerations. The CEQA Appeal is available under LAMC Chapter 1A, Sec. 13B.11.1.F and may only be taken to the City Council after taking an appeal to the Board.

3. **Are both Appeals governed by the attached "Exhibit B"?**
   No, "Exhibit B" only applies to the appeal to the Board of Building & Safety Commissioners. In the event the Board of Building and Safety Commissioners upholds the DBS decision, instructions on how to file a CEQA appeal to the City Council will be sent with the letter of the Board's decision.
4. **Which Appeal needs to be filed first?**
   The appeal to the Board of Building & Safety Commissioners.

Thank you.

***I will be out of office on every other MONDAY;

Faruk Sezer MS, PE, CASp, ICC
Building Civil Engineer
Government and Community Relations Division
Los Angeles Department of Building and Safety
Suite 1080A, 201 N. Figueroa St., Los Angeles, CA 90012
213.482.0093 | dbs.lacity.gov

Click here to Report a DBS Code Violation
Click here to Schedule an Inspection
Click here to Check Permit Status
Click here to View Historical Records

On Thu, Jun 12, 2025 at 12:55 PM Ziggy Kruse <ziggykruse2005@yahoo.com> wrote:

> Hello Faruk:
>
> Thank you for stepping in. However, we would prefer to receive your response by end of day today as this is a very time sensitive matter, with deadlines that are not clear.
>
> Looking forward hearing back from you soon.
>
> Sincerely,
> Ziggy

On Thursday, June 12, 2025 at 12:22:34 PM PDT, Faruk Sezer <faruk.sezer@lacity.org> wrote:

HI Ziggy,
This is Faruk from GCR/DBS
Moved Binh and Osama to Bcc.
I will try to get to you today or no later than tomorrow afternoon.

Thank you.

***I will be out of office on every other MONDAY;

Faruk Sezer MS, PE, CASp, ICC
Building Civil Engineer
Government and Community Relations Division
Los Angeles Department of Building and Safety
Suite 1080A, 201 N. Figueroa St., Los Angeles, CA 90012
213.482.0093 | dbs.lacity.gov

Click here to Report a DBS Code Violation
Click here to Schedule an Inspection

Click here to Check Permit Status
Click here to View Historical Records

On Thu, Jun 12, 2025 at 11:56 AM 'Ziggy Kruse' via LADBS GCR <ladbs.GCR@lacity.org> wrote:

> Hello Binh:
>
> Thank you for your response.
>
> However, since is this is a time sensitive matter, we (the community) would greatly appreciate if we can receive an answer to all questions by end of day today.
>
> Thank you.
>
> Sincerely,
> Ziggy

On Thursday, June 12, 2025 at 09:55:37 AM PDT, Binh Phan <binh.phan@lacity.org> wrote:

Hello Ziggy - I am copying our Government & Community Relations group to assist.

On Tue, Jun 10, 2025 at 11:05 AM Ziggy Kruse <ziggykruse2005@yahoo.com> wrote:

> Good Morning, Mr. Phan:
>
> Please provide the information requested below in regard to the Letter of Determination (LOD) for the Demolition of the Building located at 11973 San Vicente Boulevard (Historic-Cultural Monument No. LA-887):
>
> 1. Timeline for Appeal of the Decision made by you and your office
>   a. When does the Appeal period start
>   b. When does the Appeal period end
>
> 2. What is the difference between the "Appeal to Board of Building & Safety Commissioners" and "CEQA Appeal"?
>
> 3. Are both Appeals governed by the attached "Exhibit B"?
>
> 4. Which Appeal needs to be filed first?
>
> Based on your expertise, please let us know what other Letters of Determinations the LADBS has issued since 2022.
>
> Considering that this is a time sensitive matter, and in order to protect the public's Right to due process, we respectfully request that you provide the above sought information as soon as possible, but no later than the end of day Wednesday, June 11, 2025.
>
> We thank you in advance for your help with this matter.

> Sincerely,
>
> Ziggy Kruse Blue and Bob Blue

--
For inquiries about the status of an RTI or permit issuance please email to: rti.ladbs@lacity.org.

For inquiries about the status of a plan check submittal please email to: pcsubmittal.ladbs@lacity.org.

For Soft-Story Retrofit questions, please call (213) 202-9924 or (213) 482-7638 and ask to speak with a supervisor or e-mail soft-storyretrofit@lacity.org.

Attachment D-1

06-06-2025 LOD's "Exhibit B"

INFORMATION BULLETIN / PUBLIC – BUILDING CODE
REFERENCE NO.: Effective: 01-01-2023
DOCUMENT NO.: P/BC 2023-149 Revised:
Previously Issued As: P/BC 2020-149

PROCEDURE FOR PROCESSING "ERROR OR ABUSE OF DISCRETION" APPEALS OF LADBS ACTIONS TO THE BOARD OF BUILDING AND SAFETY COMMISSIONERS

This Information Bulletin provides the procedure for processing requests for Modification of Building Ordinances (Request for Modification) and, subsequently, appeals alleging error or abuse of discretion by the Los Angeles Department of Building and Safety ("LADBS") concerning the City of Los Angeles Building Code (LABC) or other items within the powers of the Board of Building and Safety Commissioners (BBSC) as granted by LAMC 98.0403.1(b). Such appeals shall be filed in accordance with procedures outlined in LAMC Section 98.0403.2.

LADBS staff uses the following guidelines to process appeals filed under LAMC 98.0403.2:

1. PROCESSING FEES

The customer shall complete the Request for Modification Form and provide the request to the LADBS staff member along with exhibits and any pertinent information for the request. The LADBS staff member's supervisor will determine the processing fees pursuant to LAMC Section 98.0403.2(a) and refer the customer to cashier with (3) copies. Processing fees are $130.00 for the first item and $39.00 for each additional item, plus $208.00 for two (2) hours of research. For complex requests requiring more than two (2) hours of research, an additional research fee may be imposed.

Note: At satellite offices where cashiers are not available, the appellant may leave a check or money order made out to the "City of Los Angeles" for the appropriate amount. LADBS shall process the application and send a copy with receipt of payment to the appellant.

2. DETERMINATION

The LADBS Staff member's supervisor shall make a determination to grant, grant with conditions, or deny the Request for Modification and provide said information to the customer. If dissatisfied with the supervisor's interpretation, the customer can file an appeal under LAMC Section 98.0403.2(b).

LAMC Section 98.0403.2(b). appeals shall be submitted to the Chief Inspector, Building Civil Engineer and above in charge of the office where the determination was made. (The term "Manager" shall be used hereinafter to describe this senior staff position.)

If the Manager determines that LADBS neither erred nor abused its discretion in making the determination, and the appellant wishes formally to initiate the appeal process, the Manager shall provide the required "Supplemental Application for Appeals" Form (Appeal Form) and

As a covered entity under Title II of the Americans with Disabilities Act, the City of Los Angeles does not discriminate on the basis of disability and, upon request, will provide reasonable accommodation to ensure equal access to its programs, services and activities. For efficient handling of information internally and in the internet, conversion to this new format of code related and administrative information bulletins including MGD and RGA that were previously issued will allow flexibility and timely distribution of information to the public.

instruct the appellant how to complete the form.

The appellant must itemize the grounds for the appeal, along with applicable LAMC sections, on the Appeal Form. The Request for Modification Form and any evidence supporting the appeal, such as photographs and correspondence should be submitted as an attachment to the appeal form.

No additional information will be accepted by the Department after the appeal form has been submitted unless a new appeal form is filed and applicable fees are paid.

3. REVIEW OF APPEAL FORMS AND FEE FOR WRITTEN REPORT

The Manager shall review the appeal package for completeness. If the Manager determines that the form and all attachments clearly state the grounds for the appeal and cannot be approved administratively, the Manager shall complete the fees portion on page two of the Request for Modification form as outlined in LAMC Section 98.0403 (b) and refer the customer to cashiers with (3) copies. Filling fees are based on the subject of the request as set forth in Tables 4A or 4B plus $104.00 for (1) hour of research.

4. ROUTE ORIGINAL APPEAL PACKAGE

After the fees are paid, the appellant shall return the original appeal package and a copy of the paid request for modification form to the Manager. The Manager shall ensure that the appellant's original appeal package is hand delivered to the Commission Office. The Commission staff shall log the appeal by assigning a case number, creating a case file and assigning the case to the responsible manager.

5. WRITTEN DETERMINATION

The Manager assigned to the case shall prepare a report and presentation setting forth the justifications and findings for LADBS's determination, specifically addressing the appellant's issues. The report shall be completed within 60 days from the date of the appeal's submittal and the item shall be scheduled for the next available BBSC hearing date. For complex requests, additional time may be required to complete the report.

6. NOTIFICATION OF PUBLIC HEARING

When the appeal is scheduled for a hearing before the BBSC, the Commission staff shall notify the appellant through a written notice at least ten days prior to the date of the hearing. The notice shall be given by email or U.S. mail.

As a covered entity under Title II of the Americans with Disabilities Act, the City of Los Angeles does not discriminate on the basis of disability and, upon request, will provide reasonable accommodation to ensure equal access to its programs, services and activities. For efficient handling of information internally and in the internet, conversion to this new format of code related and administrative information bulletins including MGD and RGA that were previously issued will allow flexibility and timely distribution of information to the public.

REQUEST FOR MODIFICATION OF BUILDING ORDINANCES

UNDER AUTHORITY OF L.A.M.C. SECTION 98.0403

PERMIT APP. #:	**DATE:**	**For City Dept. Use Only** **Building Zoning** **Grading Shoring** **Mech. Elec. Plumb.** **Green D.A. Misc.**
JOB ADDRESS:		
Tract:	**Block:** **Lot:**	
Owner: Address: City State Zip Phone	Petitioner: Address: City State Zip Phone	

REQUEST (SUBMIT PLANS OR ADDITIONAL SHEETS AS NECESSARY) | CODE SECTIONS:

JUSTIFICATION (SUBMIT PLANS OR ADDITIONAL SHEETS AS NECESSARY)

Owner/Petitioner Name (Print) **(Signature)** **Position**

FOR CITY DEPARTMENT'S USE ONLY BELOW THIS LINE

Concurrences required from the following Department(s)			Approved	Denied
☐ Los Angeles Fire Department	Print Name_____	Sign_____	☐	☐
☐ Public Works Bureau of Engineering	Print Name_____	Sign_____	☐	☐
☐ Department of City Planning	Print Name_____	Sign_____	☐	☐
☐ Department of County Health	Print Name_____	Sign_____	☐	☐
☐ Other _____	Print Name_____	Sign_____	☐	☐

DEPARTMENT ACTION

☐ **GRANTED** ☐ **DENIED**

Reviewed by: (Staff) (Print) ***Sign*** ***Date***

Action taken by: (Supervisor) (Print) ***Sign*** ***Date***

NOTE: IN CASE OF DENIAL, SEE PAGE #2 OF THIS FORM FOR APPEAL PROCEDURES

CONDITIONS OF APPROVAL (Continued on Page 2):

For Cashiers Use Only

(PROCESS ONLY WHEN FEES ARE VERIFIED)

(DEPARTMENT USE ONLY)

FEES

Appeal Processing Fee.. (No. of Items) =	1	X $130 + $39/addl	= 130.00
Inspection Fee ..... (No of Insp.) =		X $ 84.00	=
Research Fee ... (Total Hours Worked) =	2	X $104.00	= 208.00
Subtotal			= 338.00
Development Services Center Surcharge		X .03	= 10.14
Systems Development Surcharge		X .06	= 20.28
Total Fees			= 368.42

Fees verified by:

Print and Sign _____

Permit App #:	Job Address:

CONDITIONS OF APPROVAL (Continued from Page 1)

CITY OF LOS ANGELES
BOARD OF BUILDING AND SAFETY/DISABLED ACCESS COMMISSION APPEAL FORM

(Must be Attached to the Modification Request Form, Page 1)

AFFIDAVIT – LADBS BOARD OF BUILDING AND SAFETY COMMISSIONERS – RESOLUTION NO. 832-93

I, _____ do state and swear as follows:
(Print or Type Name of the Person Signing this Form)

1. The name and mailing address of the owner of the property (as defined in the resolution 832-93) at _____ as shown on the appeal application (LADBS Com 31) are correct, and
2. The owner of the property as shown on the appeal application will be made aware of the appeal and will receive a copy of the appeal.

I declare under PENALTY OF PERJURY that the forgoing is true and correct.

Owner's Name(s) _____ _____
(Please Type or Print) (Please Type or Print)

Owner's Signature(s) _____ (Two Officers' Signatures Required for Corporations)
(Please Sign)

Name of Corporation _____ _____
(Please Print Name of Corporation) (Please Type or Print)

Dated this _____ day of _____ 20_____

CALIFORNIA ALL-PURPOSE ACKNOWLEDGEMENT----------SIGNATURE(S) MUST BE NOTARIZED

State of **CALIFORNIA** County of _____ on _____

before me, _____, personally appeared _____,
Name, Title of Officer (e.g. Jane Doe, Notary Public) Name(s) of Signer(s)

who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument in person(s), or the entity upon behalf of which the person(s) acted, executed the instrument. **I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing is true and correct.**

WITNESS my hand and official seal. Signature _____

As a covered entity under Title II of the Americans with Disabilities Act, the City of Los Angeles does not discriminate on the basis of disability and, upon request, will provide reasonable accommodation to ensure equal access to its programs, services and activities.

APPEAL OF DEPARTMENT ACTION TO THE BOARD OF BUILDING AND SAFETY COMMISSIONERS/DISABLED ACCESS APPEALS COMMISSION

_____ _____
Applicant's Name Applicant's Title

_____ _____
Signature Date

FEES

(DEPARTMENT USE ONLY)

Board Fee ..... (No. of Items)	1	X $354 +$215/addl	=	354.00
Inspection Fee ..... (No of Insp.) =		X 84.00	=	0.00
Research Fee ... (Total Hours Worked) =	2	X 104.00	=	208.00
Subtotal			=	562.00
Development Services Center Surcharge		X .03	=	16.86
Systems Development Surcharge		X .06	=	33.72
Total Fees			=	612.58

Fees verified by:

Print and Sign _____

For Cashiers Use Only
(PROCESS ONLY WHEN FEES ARE VERIFIED)

SUPPLEMENTAL APPLICATION FOR APPEALS

TYPE OF APPEAL:

- ☐ BUILDING CODE APPEAL
- ☐ ZONING CODE APPEAL
- ☐ INSPECTION / CODE ENFORCEMENT APPEAL

PROJECT TYPE:

- ☐ ONE OR TWO FAMILY RESIDENTIAL
- ☐ MULTI-FAMILY RESIDENTIAL
- ☐ COMMERCIAL/INDUSTRIAL

PERMIT APPLICATION:		
ADDRESS:		ZIP:
TRACT:	BLK:	LOT:
OWNER NAME:	OWNER ADDRESS:	ZIP:

APPLICATION INFORMATION:

NAME:	ADDRESS:	ZIP:
EMAIL:	APPLICANT SIGNATURE:	DATE:

ISSUES:	VIOLATION:	CODE SECTION:
1.		
2.		
3.		

- ❖ FOR ADDITIONAL ISSUES, ATTACH TO THIS APPLICATION
- ❖ ATTACH ALL APPLICABLE EXHIBITS AND EVIDENCE TO THIS APPLICATION

SUPPLEMENTAL APPLICATION FOR APPEALS

ISSUES:	VIOLATION:	CODE SECTION:
4.		
5.		
6.		
7.		
8.		
9.		

Attachment D-2

City of Los Angeles' Non-Planning Appeal Form

LOS ANGELES CITY CLERK APPLICATION FORM FOR CEQA APPEAL TO CITY COUNCIL (LAMC §197.01)

DO NOT USE THIS FORM to initiate an appeal of a determination made under the Planning and Zoning Code (LAMC Chapter 1) or a determination made by a proprietary department (Airports, Harbor or Water and Power). To initiate an appeal of a determination made under the Planning and Land Use Code or by a proprietary department, please contact the department or individual who made the determination.

USE THIS FORM to initiate an appeal to City Council (pursuant to Los Angeles Municipal Code (LAMC) §197.01) of a nonelected decisionmaking body or individual's (1) certification of an environmental impact report; (2) adoption of a negative declaration or mitigated negative declaration; or (3) written determination that a project is not subject to the California Environmental Quality Act (CEQA).

1. LOWER NONELECTED DECISIONMAKING BODY/INDIVIDUAL INFORMATION

Lower Nonelected Decisionmaking Body/Individual (check one):

☐ Board of Public Works ☐ Board of Recreation and Parks Commissioners

☐ Bureau of Engineering ☐ Department of Transportation

☐ Other (print): _____

Regarding Case Number: _____

Project Title: _____

Project Address: _____

Check type of Environmental Determination (only these can be appealed to City Council):
☐ Environmental Impact Report ☐ Negative Declaration/Mitigated Negative Declaration
☐ Written Determination That Project Is Not Subject To CEQA

Date of approval of Environmental Determination: _____

LOS ANGELES CITY CLERK APPLICATION FORM FOR CEQA APPEAL TO CITY COUNCIL (LAMC §197.01)

2. APPELLANT INFORMATION

Appellant's name (print): _____

Company: _____

Mailing Address: _____

City: _____ State: _____ Zip: _____

Telephone: _____ Email*: _____

** By submitting this form electronically, you agree to accept communications from the City at the electronic mail address provided.*

- Is the appeal being filed on your behalf or on behalf of another party or organization?

☐ Self ☐ Other (print): _____

3. REPRESENTATIVE/AGENT INFORMATION

Representative/Agent name (if applicable): _____

Company: _____

Mailing Address: _____

City: _____ State: _____ Zip: _____

Telephone: _____ Email*: _____

** By submitting this form electronically, you agree to accept communications from the City at the electronic mail address provided.*

4. LEGAL BASIS FOR THE CEQA APPEAL

Attach a separate sheet providing a brief summary of the legal basis for the CEQA Appeal.

5. APPELLANT'S AFFIDAVIT

I certify that the statements contained in this application are complete and true:

Appellant's Signature: _____ Date: _____

6. FILING REQUIREMENTS/ADDITIONAL INFORMATION

- The following documents are required for each appeal filed:
  - Complete appeal application (this form completely filled in)
  - Legal basis for the CEQA Appeal (attached to this form)
  - Copy of the challenged decision to certify an environmental impact report, adopt a negative declaration or mitigated negative declaration, or written determination that the project is not subject to CEQA (attach to this form)

LOS ANGELES CITY CLERK APPLICATION FORM FOR CEQA APPEAL TO CITY COUNCIL (LAMC §197.01)

- All documents comprising this appeal must also be filed concurrently with the nonelected decisionmaking body or individual whose environmental determination is being appealed [LAMC 197.01 D]
- A CEQA Appeal can only be filed if the challenged decision is not otherwise appealable to the City Council [LAMC 197.01 B]
- A CEQA Appeal can only be filed within the earliest of: (i) 10 days following the filing of either a Notice of Exemption or Notice of Determination in compliance with CEQA; or (ii) 180 days following the Environmental Determination if no Notice of Exemption or Notice of Determination is filed [LAMC 197.01 C]
- Within 10 days of filing the CEQA Appeal, Appellant shall submit to the City Clerk all documentary evidence, other supporting material, and argument that Appellant wishes to present to the City Council [LAMC 197.01 E.2]

This Section for City Clerk Staff Use Only	
Reviewed & Accepted by (City Clerk):	Date:
☐ Internal review completed	
Deemed Complete/Referred for Assignment by (City Clerk):	Date:

Attachment D-3

User Instructions for filing a City of Los Angeles' Non-Planning Appeal Form

An Official Website of the City of Los Angeles
City Services City Directory
Office of the CityClerk



File a (Non-Planning) CEQA Appeal

Fill out the PDF form below for Non-Planning CEQA Appeals and email it with your supporting material to clerk.cps.ceqa@lacity.org. Please read the form carefully. Do not submit Planning or proprietary department related CEQA Appeals using this form. You may submit appeals for Planning related CEQA determinations with the Department of City Planning. If you have questions, email clerk.cps.ceqa@lacity.org or call (213) 978-1133.

Notice to Los Angeles Office of the City Clerk Industry Professionals

If you are compensated to interact with the Los Angeles Office of the City Clerk, City law may require you to register as a lobbyist and report your activity. Any individual may qualify as a lobbyist, regardless of occupation, education, training, or professional title. A lobbyist may hold a position that includes but is not limited to attorney, CEO, consultant, government liaison, business owner, permit applicant, urban planners, expediters, land developers, architect, various real estate professionals and others.

More information is available online through the Ethics Commission's lobbying program and publication pages. For assistance, please contact the Ethics Commission.

Non-Planning CEQA Appeal Form

Office of the City Clerk
200 N Spring St, Room 360
Los Angeles, CA 90012
Our Officers



Petty Santos
Interim City Clerk

Vacant
Executive Officer

Quick Links

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Council & Public Services

Elections

Neighborhood Council Funding

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Attachment E

Email Communication

07-14-2025

Veronica Lopez, LADBS Board Secretary

Re: TIME SENSITIVE ... Barry Building Demolition Project ... Appeal Question ... THANK YOU for your response ... Please see email for details ...

From: Veronica Lopez (veronica.lopez@lacity.org)

To: ziggykruse2005@yahoo.com

Cc: bob.blue@live.com; clkesq@outlook.com

Date: Monday, July 14, 2025 at 11:27 AM PDT

Good Morning Ziggy,

The board file for this appeal is BF 250851. Unfortunately, No additional information is accepted after the board appeal has been submitted unless a new appeal form is filed and applicable fees are paid. Refer to Exhibit B, page 2.

Thank you,

Veronica Lopez
Department of Building & Safety, City of Los Angeles
Commission Office - Board Secretary
Structural Engineering Associate
201 N. Figueroa St., Room 1030
Los Angeles, CA 90012
(213) 482-7429

Please note my Regular-Day-Off (RDO) is every other Friday.

For general Zoning and Building code questions, please refer to our call center at 311 or (213) 473-3231 to speak with an LADBS Call Center Engineer. Also, for additional information you may visit our website at dbs.lacity.gov

> On Mon, Jul 14, 2025 at 11:20 AM Ziggy Kruse <ziggykruse2005@yahoo.com> wrote:
>
> Good Morning, Veronica:
>
> Hope you had a great "long" weekend.
>
> Also, please provide us with all of the LADBS' Case File Numbers that were created for the Appeal of the LOD in the Barry Building Demolition Project.
>
> This way we can submit any additional documents to that file.
>
> Thank you in advance for you continued assistance and help with this.
>
> Sincerely,
> Ziggy
>
> On Monday, July 14, 2025 at 07:05:21 AM PDT, Veronica Lopez <veronica.lopez@lacity.org> wrote:

Good Morning Ziggy,

Will do.

Regards,

Veronica Lopez
Department of Building & Safety, City of Los Angeles
Commission Office - Board Secretary
Structural Engineering Associate
201 N. Figueroa St., Room 1030
Los Angeles, CA 90012
(213) 482-7429

Please note my Regular-Day-Off (RDO) is every other Friday.

For general Zoning and Building code questions, please refer to our call center at 311 or (213) 473-3231 to speak with an LADBS Call Center Engineer. Also, for additional information you may visit our website at dbs.lacity.gov

On Thu, Jul 10, 2025 at 9:29 PM Ziggy Kruse <ziggykruse2005@yahoo.com> wrote:

> Hi Veronica:
>
> Thank you so much for your response and the clear statement you provided.
>
> I guess I just wanted to make sure that everything was done correctly, sort of down the line from former President Ronald Reagan's statement "Trust, but verify."
>
> With that in mind, please add the following names to the list of interested parties for notification of the Staff Report and LADBS' Board Hearing:
>
> Ziggy Kruse Blue: ziggykruse2005@yahoo.com
> Bob Blue: bob.blue@live.com
> Corin Kahn: clkesq@outlook.com
>
> I am sure we'll be in touch with more questions leading up to the Board hearing, but in the meantime, please have a wonderful weekend.
>
> Thank you again for your continued help and assistance with this.
>
> Sincerely,
> Ziggy

On Thursday, July 10, 2025 at 03:18:35 PM PDT, Veronica Lopez <veronica.lopez@lacity.org> wrote:

Good Afternoon Ziggy,

The affidavit was not required and the board fees were paid yesterday. The Permit and Engineering Bureau dropped off the processed appeal forms yesterday. The appeal has been logged, given a board file
number and a file has been created. Once the Department submits a staff report and presentation to the Commission Office, the item will be scheduled for a hearing. They have 60 days to do so from the date the board fees
were paid.

Regards,

Veronica Lopez
Department of Building & Safety, City of Los Angeles
Commission Office - Board Secretary
Structural Engineering Associate
201 N. Figueroa St., Room 1030
Los Angeles, CA 90012
(213) 482-7429

Please note my Regular-Day-Off (RDO) is every other Friday.

For general Zoning and Building code questions, please refer to our call center at 311 or (213) 473-3231 to speak with an LADBS Call Center Engineer. Also, for additional information you may visit our website at dbs.lacity.gov

On Thu, Jul 10, 2025 at 10:56 AM Ziggy Kruse <ziggykruse2005@yahoo.com> wrote:

> Good Morning, Veronica:
>
> I am following up on our email conversation from yesterday regarding the notarization of page 2 of the Appeal Form regarding the Barry Building Demolition Project.
>
> As you know I asked about the notarization yesterday, but have not received a more definite answer that the Appeal was officially accepted and no other steps need to be taken from the Appellant's side.
>
> We just want to document things in writing to ensure that the members of the public have fulfilled their obligations to file the appeal in a timely manner and that LADBS has no further inquiries in order to accept the Appeal.
>
> Thank you again for all your help and assistance. It is truly appreciated.
>
> Sincerely,
> Ziggy

Attachment F

Transcript of the 09-05-2024 Cultural Heritage Commission (CHC) Meeting

(with highlighted sections for: Sean Silva)

TRANSCRIPT OF

CULTURAL HERITAGE COMMISSION

REGULAR MEETING

CITY OF LOS ANGELES

SEPTEMBER 5, 2024

AGENDA ITEM NUMBER 4

CHC-2007-1585-HCM

BARRY BUILDING, HCM #887

(https://planning.lacity.gov/plndoc/Audio/CHC/2024/09-05-2024/4_CHC_2007_1585.mp3)

COMMISSION PRESIDENT MILOFSKY: Moving on to item number four, agenda item number four, the Barry Building. Lambert?

MR. GIESSINGER: Yes, good morning, Commissioners. Lambert Giessinger, for the record. The item before you is related to the proposed demolition of the Barry Building, historic cultural monument number 887, located at 11973 to 11975 San Vicente Boulevard in Brentwood.

The Planning Department has prepared an Environmental Impact Report as required for the proposed demolition. And the Department of Building and Safety is charged with its certification since there is no replacement project. The Department of Building and Safety sent a letter to the commission on May 9th, requesting the commission's recommendation on the certification of the EIR, and whether or not there are potentially overriding considerations to justify the demolition of a historic cultural monument.

Melissa Jones of OHR staff and Mindy Nguyen of the Planning Department's major projects section who prepared the EIR are here to present the staff report. Additionally, Hector Buitrago of the Department of Building and Safety is here if the commission has any questions for him.

MS. JONES: Good morning, Commissioners. Melissa Jones from Office of Historic Resources, for the record. The proposed project is the demolition of the Barry Building, historic cultural monument number 887. The portion of the project site that currently contains the Barry Building would become a vacant lot. A landscape buffer is proposed to be installed along the southern boundary of the project site fronting San Vicente Boulevard. However no future development of the site is proposed and/or considered as part of the project.

For reference, the Barry Building is located on the north side of San Vicente Boulevard, between Montana Avenue and Saltair Avenue in Brentwood. This is west of the 405 Freeway, adjacent to the Brentwood Country Club. The building is situated along San Vicente Boulevard Commercial Corridor, within the median of which are the coral trees which are designated as historic cultural monument number 148.

Built in 1951, this two story commercial building was designed by Los Angeles architect, Milton H. Caughey, for David Barry, Jr., as ground floor retail with four wings of offices around a central courtyard, lushly landscaped with tropical plants. First housing Brentwood Books in 1960 and subsequently Dutton's

Brentwood Books starting in 1984, the building's ground floor storefront and courtyard served the Brentwood community as a bookstore and café for nearly 50 years until 2008. The building has been vacant and fenced off since 2017.

The building's international style modern architectural design is reflected in its flat roof, with wide overhanging eaves, smooth stucco cladding, floor to ceiling grid and louver windows on the interior courtyard, and horizontal band of windows originally screened with louvered wood grills on the primary south facing façade. The grills were removed without approvals in 2016.

The second story floats above the first floor storefronts and opening to the courtyard. The courtyard is landscaped with raised flagstone and concrete planters containing a variety of palm trees, as well as four steel framed benches with wood slat seating and backing.

Two curved staircases, one in the northeast corner and one in the southwest corner, provide access to the cantilevered second story exterior walkway that encircles the courtyard. Each staircase consists of a floating concrete treads in steel pans, supported on triangular concrete mono stringers. Steel pipes

support both the stairs and second floor walkway railings, with exposed detailing such as exposed metal plates and bolts serving as decorative elements. Louvered and gridded wood screen shelter portions of the east and west balconies. A passage at the northeast corner of the courtyard connects it to a rear parking lot.

The City Council designated the Barry Building as historic cultural monument number 887 in 2007, finding that it was significant under two of the cultural heritage ordinance criteria. Firstly, that it reflects the broad cultural, economic, or social history of the nation, state, or community, as the long time home of Dutton's Brentwood Bookstore, a symbol of the Los Angeles literary scene, that contributed to the growth and development of the San Pimente [sic] -- San Vicente Commercial Corridor in Brentwood.

And secondly, that it embodies the distinguishing characteristics of an architectural type specimen inherently valuable for a study of a period style of method of construction, as a distinguished example of international style architecture.

There was a previous attempt to demolish the Barry Building in 2009. The current property owner filed an application for the redevelopment of the site

containing the subject property into a new commercial center.

At this time the Commission reviewed the Environmental Impact Report for that project. It expressed concerns over the proposed demolition of the Barry Building. In a formal letter addressed to the City Planning Commission, the Commission opposed the demolition of the Barry Building and supported a preservation alternative that retained and integrated the building into a proposed project.

The Commission stated, quote, any concerted effort to purposely demolish an 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 the Barry Building can be integrated into new development, while also meeting and exceeding the goals of the proposed project. Other projects throughout the city of Los Angeles have been successful in incorporated historic cultural monuments through the guidance and support of the Cultural Heritage Commission and its Office of Historic Resources. The Commission reiterated that, quote, we strongly support sensitive

reuse of historic resources, unquote.

The applicant withdrew the application for the proposed Green Hollow Square development project in October 2013. In 2014 the Los Angeles Department of Building and Safety inspected the Barry Building and it was determined that it falls within the scopes of the city's soft story retrofit program.

In 2018 the building's department notified the owner of the need for compliance. Mandatory compliance with the city's ordinance can be achieve -- achieved through a structural retrofitting or demolition. However, the demolition option applies generally to buildings that are subject to the soft story retrofit program and does not specifically address historical buildings.

In 2019 the current property owner of the Barry Building applied for permits to demolish the building, with no further plans for development of the site. This proposed demolition of an historic cultural monument triggered a review under the California Environmental Quality Act, commonly known as CEQA, and necessitated the [inaudible] Environmental Impact Report.

My colleague Mindy Nguyen from the major projects unit of our department will now walk through -- the

Commission through some background on CEQA and the Environmental Impact Report that was prepared for the proposed demolition.

MS. NGUYEN: Good morning, Commissioners. Thank you, Melissa. Again, I'm with the major projects section of the City Planning Department. And I'll be providing a brief overview of the California Environmental Quality Act, also known as CEQA, and how it relates to the Barry Building project.

Adopted in 1970, CEQA requires a disclosure of potential impacts and any feasible mitigation of significant impacts to the public and decision makers. Typically a CEQA clearance is only required for discretionary projects. While demolition without a proposed project such as the Barry Building is technically considered a ministerial project, the demolition of an historic resource requires the preparation of an Environmental Impact Report, or EIR.

During the preparation of an EIR, there are multiple opportunities from input -- for input from the public, as well as state and local agencies. An EIR is typically comprised of an initial study, draft EIR, and final EIR, and is required to study specific topics provided by the state, which I'll share in the next slide.

There are a total of 16 topics shown here, one of the most important ones being cultural resources, for the specific project before us today. During the initial study phase, the city determined what topics have no or less than significant impacts. These topics can be scoped out.

For the Barry Building project these topics are shown in gray text. Any remaining topics would have to undergo a more in depth analysis in the draft EIR to determine if there will be any significant impacts and whether they can be mitigated. For the Barry Building project these topics are shown in blue text. Any comments in the draft EIR are then responded to in the final EIR.

This slide goes over the environmental review timeline for the Barry Building. The initial study was published in November 2020 with a 30 day public comment period. As shown on the previous slide, a number of topics were scoped out due to the nature of the project, with seven topics identified for further study in the draft EIR.

The draft EIR was published in February 2023 with a 45 day public comment period, and analyzed air quality, cultural resources, greenhouse gas emissions, land use and planning, noise, transportation, and

tribal cultural resources. Impacts to all categories were found to be either less than significant or could be mitigated to less than significant, except for cultural resources and land use planning.

The final EIR was published in September 2023, responded to a total of 105 public comments received in the draft EIR, including comments from the LA Conservancy and Council District 11, and addressed two minor corrections in the draft EIR.

The next step requires the Los Angeles Department of Building and Safety to decide whether or not they will certify the EIR, adopt a Statement of Overriding Considerations, and adopt the environmental findings. As mentioned there were only three categories that resulted in significant impacts. The first is noise, which could be mitigated to less than significant, with the implementation of sound barriers to reduce construction noise by 15 decibels along the north, east, and western property lines.

The other two topics were cultural resources and land use and planning, both of which resulted in significant and unavoidable impacts as the project is demolishing an historic resource. While a mitigation measure was included to require a historic American building survey report in consultation with the Office

of Historic -- of Historic Resources, to document and file a visual and written history and description of the existing building, even after implementation, impacts would remain significant and unavoidable as the resource would be removed.

In compliance with CEQA, four alternatives were analyzed for the project. The no project alternative involves retaining the existing building and seismically retrofitting the south wing. The preservation alternative includes soft story seismic retrofit work, and additional structural improvements, ADA renovations, and building code and energy efficiency upgrades to the existing building.

The preservation with new construction alternative involves part of the building undergoing preservation and renovation for occupancy, while the other part is demolished and replaced with a new commercial annex. And finally the relocation alternative involves dismantling and reassembled the existing building at a new location that has yet to be determined.

As previously mentioned, this is considered a ministerial project, which means that the Los Angeles Department of Building and Safety is responsible for certifying the EIR. If they decide to approve the

project in light of the significant and unavoidable impacts, they must adopt a Statement of Overriding Considerations along with the environmental findings.

In making a Statement of Overriding Considerations, the city must have adopted all feasible mitigation measures, rejected as infeasible the alternatives to the project, recognized all significant unavoidable impacts, and balanced the benefits of the project against the project's significant and unavoidable impacts.

Each statement must separately and independently outweigh the adverse environmental impacts of the project, and justify adoption of the project and certification of the completed EIR. I'll now hand the presentation back to Melissa to go over the applicant's SOC.

MS. JONES: Melissa Jones, again for the record. The -- the property owner has drafted a Statement of Overriding Considerations, which is attached to their letter dated July 15, 2024, and linked to affirm our staff report in your agenda packet. In their draft statement, the owner has described four considerations as benefits to the demolition of the Barry Building historic cultural monument. We will go through each one and provide a recommendation on how the benefits

do not outweigh the significant environmental impacts.

Firstly, the first consideration is that the demolition of the Barry Building would attain, quote, the removal of an existing safety hazard and seismically unsafe and noncompliant structure, unquote. The subject building was constructed in 1951 and has withstood the test of time, remaining standing over the past 70 years.

It has withstood multiple significant seismic events, including the San Fernando earthquake in 1971, the Whittier Narrows earthquake in 1987, as well as the Northridge earthquake in 1994. At the time that the building was vacated in 2016, the subject building was not deemed a dangerous or unfit for human habitation by the building department, nor was it slated to be condemned.

Secondly, the owner states that the demolition would, quote, remove -- remove an attractive nuisance for vandals, transient populations, loitering, and other unlawful behavior, unquote. It can be argued that the property owner created this problem by voluntarily vacating the building and leaving it to be unoccupied for over eight years.

The proposed project is to demolish the building, rendering the site a vacant lot, with no proposed

replacement structure. In the balancing test of a project's public benefit versus its impacts to historical resources under CEQA, a vacant lot frequently contributes to additional community problems, serving as a further detriment, while not conferring any additional benefits.

As of 2015, there were over 20,000 vacant lots in the city of Los Angeles. As it is commonly known, vacant lots inclusive of vacant buildings can have negative impacts on communities that include increases in crime, vagrancy, damaging effects on mental and physical health, a reduction in values of neighboring properties, and decreased property tax revenue. Vacant lots also detract from the efforts to create cohesive, vibrant, and pedestrian friendly neighborhood commercial corridors, such as the San Vicente Commercial Corridor.

Prior to 2014, as you see on the screen, there were buildings on the lots surrounding the subject building, all of which are currently owned by the owner of the Barry Building. Demolition permits were issued for the buildings surrounding the Barry Building in February of 2014. And by October 2014, the lots surrounding the Barry Building were cleared, creating additional vacant lots that have remained so

for the past 10 years.

A third consideration highlighted by the property owner is that the demolition of the Barry Building will, quote, clear the existing property of noncompliant structures in a manner that will not preclude any future development consistent with existing zoning. One of the primary objectives of the Brentwood Pacific Palisades Community Plan is to, quote, preserve and enhance neighbors with a distinctive and significant historic character. The plan actively promotes the protection and reuse of the area's historic resources through its policies.

Nevertheless, retaining the subject building does not preclude a future project that may involve the demolition of the building and construction of a new building. As stated by the applicant, there is not a foreseeable project. So it is not in appropriate to weigh the purely speculative benefit of clearing the lot for an unknown future project.

Lastly, a fourth consideration stated as a benefit outweighing the environmental impacts of demolishing the historic cultural monument, is that complying with the soft story retrofit program through demolition is the only economically feasible course of action. Majority of buildings subject to the ordinance

have complied the retrofitting, not through demolition.

Out of the over 880,000 parcels in the city of Los Angeles, only 12,347 buildings are subject to the soft story retrofit program. From the date a notice of compliance is issued for a property, owners have seven years to fully comply with the ordinance. As shown here on the screen, there are various milestones to reach full compliance. By year two, plans are to be submitted. And after three and a half years, permits are to be issued. And by year seven, the project is to be completed, marked by the issuance of a certificate of compliance.

As of February 2024, 76 percent of properties subject to the ordinance have achieved full compliance. Only 30 of these, or 0.2 percent, complied through demolition. None of the 30 properties that complied through demolition were designated historic cultural monuments.

According to the applicant, only three other historic cultural monuments are subject to the soft story retrofit ordinance, all of which have complied with the ordinance by retrofitting their buildings. These three buildings include the Roberts Apartments, historic cultural monument number 1185 in Silverlake,

which complied with the ordinance in 2020. The Elkay Apartments, which is designated as historic cultural monument number 368, located in Westwood, that complied with the ordinance in 2022. Lastly, the Sheats Apartments, designated historic cultural monument number 367, also located in Westwood, which complied with the ordinance in 2022.

The property owner argues that the benefit of the project is the, quote, removal of an existing safety hazard, and seismically unsafe and noncompliant structure, end quote. However, it is arguable that substantial evidence does not support that it is necessary to demolish the building to attain this, quote, benefit. Compliance with the soft story retrofit program only requires the soft façade of the building to be retrofitted, and would not require any accessibility upgrades.

As an historical resource, the subject building would be able to utilize the California Historical Building Code, which provides alternative building regulations for permitting repairs, alterations, and additions necessary for the preservation, rehabilitation, relocation, related construction, change of use, or continued use of a qualified historical building or structure.

Specifically, the code is intended to provide for reasonable safety from fire, seismic forces, or other hazards, for occupants and users of such buildings, structures, and properties, and to provide reasonable availability and usability by the physically disabled. In addition, if upgrades were pursued, the Americans with Disabilities Act, also known as ADA, enables designated historical properties to meet alternative standards if full compliance with the regular code would threaten or destroy the historical significance of the property. As such, while it might be a benefit to remove the hazard, demolition is not necessary.

Apart from the potential loss of the designated historical resource, demolition of the structure would have other impacts. The Barry Building is one of the rare examples of commercial mid-20th century modern design, designated as historic -- an historic cultural monument.

In fact, a preliminary review suggests that out of over 1,300 designated historic cultural monuments, the Barry Building is only one of a handful of modernist commercial buildings that include the CBS Columbia Square Studios, designated as historic cultural monument number 947, the Musicians Union of

Hollywood, designated as historic cultural monument number 1158, as well as the Jones and Emmons Building, HCM number 696, as well as the Neutra office building, historic cultural monument number 676.

Further, of the 51 historic cultural monuments in the Brentwood Pacific Palisades Community, there are only two other commercial buildings, which include the gas station on South Barrington Avenue, designated as historic cultural monument number 387, and the Pacific Palisades Business Block on Sunset Boulevard and Via De La Paz, designated as historic cultural monument number 276.

Additionally, the subject building is significant to the cultural identity of the San Vicente Commercial Corridor. As a well-recognized gathering spot and local landmark, the subject building's relationship between its commercial identity and its unique architectural design have contributed greatly to the growth and development of San Vicente Boulevard as a vibrant commercial corridor.

To reiterate the purpose of today's hearing, the Department of Building and Safety has requested that the Commission give its recommendation on the adequacy of the Environmental Impact Report's analysis as it relates to historical impacts to the Barry Building.

With regards to the EIR for the proposed demolition project, staff's recommendation is that the Commission recommend to Building and Safety that the EIR was prepared in compliance with the California Environmental Quality Act, and that the Commission recommend to the Department of Building and Safety that the EIR be certified.

Further, the Department of Building and Safety requested the Commission to advise on whether Building and Safety should adopt a Statement of Overriding Considerations. Staff recommends that the benefits of the project as drafted by the property owner are not supported with substantial evidence, and none of the considerations individually outweigh the significant environmental impacts of the demolition of the Barry Building. Therefore, staff's recommendation is that the Commission recommend the Department of Building and Safety not adopt the Statement of Overriding Considerations.

This concludes my presentation. My colleague Mindy and I are here to answer any questions that you may have. Thank you.

COMMISSION PRESIDENT MILOFSKY: Thank you, Melissa. Thank you, Mindy. Commissioners, any questions? Commissioner Kanner?

COMMISSIONER KANNER: This is a question with planning and the EIR process, in making the potential EIR public and seeking public comment. How is public comment sought? Is this through notices in the newspaper? Or through neighborhood council meetings? Or in what manner does the public get involved?

MS. NGUYEN: Mindy Nguyen with city planning. So any comments on the initial study would be published as part of the draft EIR. And then any comments in the draft EIR would be published and responded to line by line in the final EIR. So that is up to the completion of the final EIR.

COMMISSIONER KANNER: Right. Right. But the public is made aware of this draft EIR through what kind of notification?

MS. NGUYEN: So all -- anybody who -- any tenant, occupant, or property owner within a 500 foot radius would be notified of the availability of these documents. And they're also posted on our website. And then we also have an interested parties list. So if someone has indicated that they are interested in this project, they should also receive a notice as well, even if they're outside of that 500 foot radius.

COMMISSIONER KANNER: Okay. And through the city process, is that -- is notification given to the

council office?

MS. NGUYEN: I actually need to double check on that. But I believe -- I believe so. But they've been in -- they've been interested in this project. So I think as a result of that, they most likely happen. But I can double check on that. I wasn't the original planner on this project, but I can verify.

COMMISSIONER KANNER: I'm just trying to determine how thorough the process is.

KEN: No. Thank you, Commissioner Kanner. I mean typically the council office would not be commenting on the EIR, but it is notified of the availability of the draft EIR and the final EIR. And as was indicated, the council office has been involved in monitoring this case as it's been going through the EIR process.

I want to just, while I have the mic for a moment, I just wanted to reinforce one point before we go to further questions and the applicant's presentation. You know, this is a very unusual case coming to the Commission, very different from the types of considerations of historic cultural monument nominations that are kind of the bread and butter of most of your agendas, and the fact that you're being asked to weigh in on questions related to CEQA in a very detailed way.

So I just wanted to clarify in case I think Melissa did a good job of indicating this, but just so you're clear and the public is clear, that the narrow focus today is this request from the Department of Building and Safety to have the Commission provide its recommendation back to LADBS about the EIR, on the two questions of should the EIR be certified first, and then secondly should a Statement of Overriding Considerations, is a Statement of Overriding Considerations justified.

And to clarify again for your benefit and for the public who are listening today, the Commission is therefore not acting upon an actual demolition permit. The Commission of course under the cultural heritage ordinance does have the authority to object or not object to a demolition permit. And if the -- at a future date, if the demolition proposal proceeds, a demolition permit may be referred to our office, and we'd refer that to the Commission for your consideration. The Commission would have the authority to object or not object under the ordinance's provisions for a time limited period.

But that is not before you today. So that could come back at a future date. Your purview today is really limited to these recommendations on CEQA.

COMMISSION PRESIDENT MILOFSKY: Thank you, Ken. Commissioners, any other questions? Thank you, Melissa. Thank you, Mindy.

MS. NGUYEN: Thank you. Mindy Nguyen with city planning. I just wanted to confirm that the council district is in fact part of the agency list that we send notification to for all three components of the EIR.

COMMISSION PRESIDENT MILOFSKY: Thank you. I believe the applicant probably also wants to speak today. And give you equal time. I think you've got 20 minutes.

MS. BRISKI: Commission President Milofsky, if I could make a quick announcement while the applicant sets up. I'm going to make a quick announcement for those, in case anyone's trying to join us over council phone, I'm going to switch to the council phone line just to give them the call in information over Zoom.

COMMISSION PRESIDENT MILOFSKY: Thank you.

MS. BRISKI: So if you are joining us on council phone, please note that call in participation for today's CHC meeting is being offered over Zoom. You can listen to the meeting by calling 213-338-8477 or 669-900-9128. Today's Zoom meeting ID is 897 1578 3204. And the meeting passcode is 531988. We'll now be

switching back to the Zoom line where you can use that phone number to listen to today's meeting. Thank you.

COMMISSION PRESIDENT MILOFSKY: Ari, please put 20 minutes on the clock.

MS. BRISKI: Ari Briski, for the record, 20 minutes on the clock.

MR. CASEY: Good morning, Commissioners. My name is Ed Casey and I'm representing the applicant and the property owner. And I'm joined also today by Aaron Green from Afriat Consulting. Thank you for taking the time to consider this matter. It's been long in the making. As Planning told you, the EIR itself has taken over three years. So we do appreciate you taking the time.

I'm going to focus on -- I'm going to focus mostly on my remarks on the issue of the Statement of Overriding Considerations, the SOC. We obviously agree with your staff's recommendation that you recommend to Building and Safety to certify the EIR. Planning Department prepared it. It's quite comprehensive. And I note also that includes a range of alternatives that Planning developed in conjunction with OHR staff. So we do agree with that part of the recommendation.

On the first slide I also want to note that this is talking about compliance with the soft story

ordinance. And that ordinance expressly applies to historic buildings at Section 91.9308 [inaudible]. So before I get into some of the SOC issues, just a few issues about background. The parcel that the Barry Building is located on is only about two thirds of an acre. And I point that out just because there's nothing else you can really build on it in addition to the Barry Building without building extensive subterranean parking.

And you saw the slide also that staff put up, that says that the same property owner is the surrounding lots. Not quite accurate. I don't want to spend a lot about it. But if you look at Appendix C in the EIR, the actual ownership of those lots, quite different entities as detailed.

So I also want to correct some of the facts concerning the -- my client's vacating the building back in 2016. In 2015, he received a notice saying that the building was subject to the soft story ordinance. And we actually provided copies of that letter to the Commission in our supplemental presentation. And that, knowing what the structural integrity was of the building based on going through, that's the Hollow Square project, the client knew that the building was not going to be able to withstand a

moderate to severe earthquake.

So in 2016, he started to send out letters to the tenants saying it's time to vacate given that health risk. And that letter is also in your packet. I believe it's Exhibit P. And since that time, in terms of maintenance of the property, you may hear people say that the property hasn't been maintained, the -- my client has regularly maintained through property management company, maintaining the building the best they can. And that's also confirmed in a letter at Exhibit O to the EIR.

And I'm going to make these references to the EIR because staff talked about there needs to be substantial evidence to support an SOC. And they're absolutely right. I'm demonstrating to you that not only is there substantial evidence to support this, it's the only evidence.

So let me go right to seismic safety, make a couple points here addressing some of the issues raised by staff. The first one was staff says, well the building has withstood a number of prior seismic earthquake events. True. But that is not justification to not comply with the soft story ordinance. There's no exception in the ordinance for buildings that have withstood prior earthquake events. None.

Matter of fact, the ordinance was adopted in response to those prior earthquake events to make sure that buildings that have seismic concerns are retrofitted or demolished. And we don't have to wonder whether the next event there'll be such a seismic event that that building would be destroyed and people hurt. So that's that point.

The next point was staff said the demolition may not be necessary because the soft story ordinance only applies to the south wing. Now that's technically true. But the structural expert, a company called Englekirk, and Mr. Volnyy from Englekirk is here if you have any questions. Englekirk submitted a number of technical reports that the Planning Department adopted into the EIR. They approved these structural reports. And you can -- I gave you the numbers up there on the screen, the Exhibits G and H3, Appendix I.

And one things those reports say, not just looking -- focused just on the south wing, but if you look at the -- all the wings. I know this is small print. Sorry. But again, this is from Exhibit G in the EIR, you will see that the only structural expert who looked at this building and evaluated it, said that the other wings are dramatically over stressed, up to

650 percent over stressed. Another wing was 400 percent over stressed.

So as he's going to say also, another report on the structural expert in the EIR, in the Planning Department's EIR, says -- and I'm going to read this because I know it's small up on the screen there, quote, it is our professional opinion that even with the implementation of the soft story ordinance structural retrofit, the remaining building wings will not be structurally retrofitted -- and here's the important point -- and will not be sufficient to protect building occupants if the building was subject to a moderate to severe seismic event in the LA basin. That's the opinion of the structural expert whose report were adopted into the EIR. And there's no opinion of any other structural expert to the contrary.

Now that also talked about the other HCMs. I believe there were three that had to be -- also had to comply with the soft story ordinance. And staff is correct, when we looked up the building and safety records for those three other buildings, they have complied. But there's a big difference between the seismic safety of those buildings and what those buildings needed to be retrofitted and made safe, and

the extent of the over stress in the Barry Building.

And again, I gave you in Exhibit C, that supplemental package to you all, a letter from the same structural expert, who looked at those other building and safety records and said, it's almost like night and day. Those three other HCMs had very discrete issues that had to be addressed, an extra shoring wall for example. But nothing, nothing like the extent of the seismic work that would have to be done on the Barry Building to make it safe. Again, that's Exhibit C. And copies of those records from the building and safety on the other three HCMs also use supplemental package Exhibits D through G.

And let's talk about cost. Again, the evidence. We submitted as you know in our letter, detailed cost reports from reputable companies, looking at the cost of making these retrofit and all the other things that have to go with it. Even if you say, as staff said you don't have to do strict compliance for ADA, even if you shave off that little amount, you're looking at about 12 to 15 million dollars for a 12,000 square foot building. That's economically infeasible. Because if you had to spend that money, you would end up with a negative value in this property. And that's also documented by expert in the field. And there's no

opinion to the contrary. You'd have a negative value even if you said I don't want to comply with the ADA.

And staff also said, well you also don't have to comply with 100 percent of the building code. You can do under the California Historic Building Code, something less, 75 percent. Englekirk, Mr. Volnyy, Exhibit I to your final EIR, looked at that very issue and said, even with that lower standard, that 75 percent, it would still cost that amount. Because you'd still need the same amount of retrofit because it is that over stressed, up to 650 percent over stressed.

So what's the evidence? The substantial evidence here is that the amount of work to make this building safe in a moderate to severe earthquake is substantial, it will cost a lot, to a point where if the cost had to be incurred, there's a negative value in the property. So for that reason alone, to make safety -- seismic safety alone, would justify an SOC. But there are some other issues in terms of the neighborhood issues, in terms of the vacant lot. I'm going to let others talk about that. But I do point out that the specific plan for this area requires landscape buffering. That was addressed in the Planning Department's EIR in response to Comment B19.

So at this point I'm going to turn it over to Mr. Green to address some community issues.

MR. GREEN: Good morning, Commissioners. Aaron Green, president of the Afriat Consulting Group. I'd like to actually pick up where Commissioner Kanner was asking some questions about community engagement. So my firm was retained to go above and beyond what are the minimum requirements in CEQA to conduct some community engagement work. And we've been doing that work over the last two years. And we've done that in a very robust manner.

So we have a -- we hired a team that went door to door, knocking on individual neighbors' homes, both above and below San Vicente Boulevard. We sent mailers out to the community. We conducted hundreds of live in-person phone calls with real people, reaching out, notifying them of the proposal for the building demolition, and soliciting their feedback.

We worked with businesses along San Vicente Boulevard, including the burgeoning San Vicente -- Brentwood San Vicente Chamber of Commerce. And we spent very significant amounts of time with residents on Saltair Terrace cul de sac, where all of those who are willing to spend time and work with us in engaging conversations. And we built those relationships over

the last several years.

Lastly, in response to community request, we vol-- our client voluntarily extended the comment period in the EIR, from the standard 45 days to two months. What we heard in the vast majority of cases, time and again, was that residents did not want to see this building continue to sit there on San Vicente Boulevard. And you'll see that in the comment letters to the DEIR that are in the record.

And if you look at the letters and who the senders are, those are people who live in this neighborhood. Those are people who live 100, or 300, or 500 feet from the site. The people who are actually impacted by this property are the ones that are commenting on it. What we heard from them and what you'll see in those letters, is that they want this building removed because they believe there is a significant benefit to doing so. As I've mentioned and as the community told us, they believe it's a seismic safety hazard. They believe it is an impediment to reimagining this stretch of San Vicente Boulevard, and having a future property owner provide a new project and a new vision.

In addition, there are concerns and -- about public safety. Just last month, despite the fact that

the property is double fenced, it has security cameras, it was broken into, it was vandalized, for copper wiring and copper piping. And so our client and members of the community that we spoke with feel very strongly about this.

I want to note that our client is not insensitive to the fact that this is an HCM. And in working with the council office, we have proposed a voluntary covenant that will reside on this property if the -- if the demolition is granted. And what that covenant will require is the safe removal and storage of the two marquee curvilinear staircases that are in the lobby, along with the benches. Sorry, curvilinear is not the right term, but curved staircases in the courtyard of the building. And that those would then be required to be incorporated into a future project at the site.

So we have done extensive work with the community. And we have done -- our client has done what we feel everything we can to go above and beyond these minimum requirements for finding not only benefit, but community engagement, and opportunities for the community in the future to experience some of what has been here at the site.

And I'm going to ask Ed to make some closing

comments.

MR. CASEY: Again, we appreciate your taking the time to consider this matter. As Aaron side, our client has gone through many years of effort to try to do the right thing here. And I won't repeat a number of the benefits of proceeding with demolition that Aaron mentioned. But I want to emphasize that under CEQA any one benefit, just takes one benefit, to override the significant impact to historical resources [inaudible]

To me, that benefit again is protecting human health and safety during an earthquake event, a moderate earthquake event. That was the concern, the public safety concern that led the city to adopt the soft story ordinance in the very first place. And here, to make that benefit a reality, it would take so much money, that you create a negative value on the property. From a legal perspective, that is why the ordinance has to give the property owner the right to demolish. Because no one can be forced to incur costs to a point where they have -- it makes a negative value on their property.

So recognizing that right, and the health and safety concerns, in my opinion is more than enough to justify the adoption of an SOC. Again, thank you for

your considering this matter.

COMMISSION PRESIDENT MILOFSKY: Thank you. Commissioners, any questions?

COMMISSIONER BARRON: Hi, Richard Barron. I'm an architect. And during my practice I retrofitted at least three buildings similar to this. This is a two story wood frame building. It's not complicated. It's relatively easy to put in some sheer walls, put in a steel frame, and there you go.

So I don't know where you're getting all your information. I think your sort of overkill in terms of the dramatics of it. But my experience has been that this is not a difficult building to retrofit. It's rather easy. We're not talking about an unreinforced masonry building. We're talking about a wood stud and stucco box. It's extremely easy to retrofit.

And I think Mr. Milosic [sic] can also comment on some of the work that he's done because he is also an architect. And I'm sure he's retrofitted several buildings similar to this.

COMMISSION PRESIDENT MILOFSKY: But I think my first response when you discuss the extent of seismic work required was to turn to Richard and go, it's just some sheer walls. So you have -- and you have four minutes left. If someone from Englekirk would like to

explain how you can justify $12 million worth of work.

MR. CASEY: I can have Mr. Volnyy describe the --

COMMISSION PRESIDENT MILOFSKY: We got some time left, so let's --

MR. CASEY: He can describe the amount of seismic work needed.

COMMISSION PRESIDENT MILOFSKY: Yeah.

MR. VOLNYY: Name is Vladimir Volnyy. I'm a structural engineer.

COMMISSION PRESIDENT MILOFSKY: Can you speak into the microphone, please?

MR. VOLNYY: My name is Vladimir Volnyy. I'm a structural engineer from Englekirk. I did perform a study on this building. And we did determine that, yes, you're right, you need to sheer wall [inaudible]. The cost right now, construction cost, everyone knows is skyrocketing [inaudible].

Again, I'm structural engineer. Hard for me to judge on the costs. I only can comment what's required to be retrofitted. But it -- what I see on dozens of projects in the current market, it is significant cost to retrofit the building, wood buildings, and new buildings, concrete buildings, right? It just cost to add the sheer walls and steel moment frames, it's tremendous right now.

COMMISSION PRESIDENT MILOFSKY: I see you're saying it's based -- your thought is based on current costs.

MR. VOLNYY: Current costs --

COMMISSION PRESIDENT MILOFSKY: And had this work been done 10 years ago when the owner made the decision to vacate the building, it would have been substantially cheaper?

MR. VOLNYY: I don't -- I don't [inaudible] substantially cheaper. Again, 10 years ago is not -- it was not cheap either.

COMMISSION PRESIDENT MILOFSKY: Other questions, Commissioners? Thank you.

FEMALE: I have a question for the engineer, sir. Where is your company headquartered?

MR. VOLNYY: Downtown LA.

FEMALE: You're in LA.

MR. VOLNYY: Yeah. 888 Fig. Figueroa.

FEMALE: Very good. Thank you.

MR. VOLNYY: Yeah. Down the street.

COMMISSION PRESIDENT MILOFSKY: Thank you. All right. I see that we have a number of speakers in the room. What I'd like to do, because I think this may take -- since we have a number of speakers in the room, and I assume there are a number of hands that

will be raised, I'd like to take a five minute break before we take public comment.

We have several speakers in the room who'd like to address the Commission. You'll have one minute each. When I call your name, there are, what, three position, three microphones. Please come up to the table so we can sort of work efficiently. Jessica Sanchez, Andrew Salamian [sp], and William Babbit [sp]. And please give your name before you begin your comments.

MS. SANCHEZ: Hi, I'm Jessica Sanchez. And I'm here today to advocate for no demolition of the Barry Building because the Barry Building is a great example of neglect by demolition. And it's an issue that's occurring all over the city. And obviously being a historical cultural monument does not make a building immune, and but does not mean it should be demolished and swept under the rug.

There are other issues with other buildings in the city. And to allow to approve the EIR and allow demolition of the Barry Building would pave the way for demolition of other historical cultural monuments that are buildings such as possibly the Marilyn Monroe house. And other historical buildings could be demolished because the developers feel that there is a

better plan in having a vacant lot or something of that nature. And that doesn't have anything to do with neglect.

So I believe the Barry Building should be saved as an example of how we preserve historical cultural monuments and not tear them down. Because this is a city built on culture. And that does not necessarily mean money is [inaudible]. Thank you.

COMMISSION PRESIDENT MILOFSKY: Can you give your name, please?

MS. SANCHEZ: Jessica Sanchez.

MR. BABBIT: Good morning. My name is Bill Babbit. Thank you for this opportunity. I'm a Brentwood resident, so I've had a presence in Brentwood for 30 years. I'm a board of directors of the Brentwood Homeowners Association, but I'm speaking as an individual. I'm a retired licensed architect. I have a Bachelor of Fine Arts and Architecture from the Rhode Island School of Design, as well as an MBA in Finance from Columbia University.

To say I'm very pro-building, with a nod to a famous chant, now build baby build, but not at the expense of our architectural landlords and not at the expense of significant architecture in our community. Having lived in Brentwood for a long time, until it

was shut down, I would often go to the Barry Building, Dutton's, and the coffee shop. But I would linger and enjoy the building and its architectural design, with its nod to classic architecture. I'd bring friends who are architects to see the building.

Clearly this is a very valuable piece of land. But also it's a landmark and significantly architecturally significant, in the middle of Brentwood's main street. Respecting and saving this building, this landmark --

COMMISSION PRESIDENT MILOFSKY: Finish your sentence.

MR. BABBIT: Respecting and saving this building will say something about Brentwood and the community, will remain a wonderful place to workshop, visit, and enjoy, remain a treasure, and a potential jewel in the crown for downtown Brentwood. Thank you very much.

COMMISSION PRESIDENT MILOFSKY: Thank you.

MR. SALAMIAN: Good morning. Andrew Salamian, representing the LA Conservancy. I just want to applaud staff on a really great presentation and report. I don't think this is a difficult decision. I think they made a very strong argument against demolition. You have very narrow findings to make, which every way I look at it, there's no way you can

make the findings that the benefits of demolition outweigh the significant unavoidable impacts, and that there's no feasible alternative.

The EIR gives four alternatives and they're all feasible in our view. We do think this would set a bad precedent of a developer who doesn't like the alternatives, you know, lets the building go into neglect, and then asks for a demolition permit. The gaslighting, I will say, on the costs of retrofit is kind of crazy because you can see there's a full TI included in that estimate. So I do just want to ask you to send a strong signal to LADBS. Thank you.

COMMISSION PRESIDENT MILOFSKY: Thank you. Okay. Robert Blue and Ziggy Krause, please.

MS. KRAUSE: As mentioned before, we have submitted substantial rebuttals since November 2023 [inaudible] after the EIR was published. Our rebuttals pointed out various sections in the EIR that were flawed, including one that we addressed from the Historic Resources Group analysis in which they stated that there's no connection between the Barry Building, David Barry, and the coral trees. In fact, we submitted with our rebuttal a article from the LA Times that clearly stated [inaudible] --

It had basically a statement that says, the most

indisputable [inaudible] beautiful projects on San Vicente in Brentwood. That was something that Mrs. Knudsen started way back, and Mr. Barry's project was to plant coral trees. He was the project manager. So there's one connection. In fact, there was a photograph included in our submissions from 1949 showing David Barry, Jr., holding a shovel as he and others planted one of the many coral trees on San Vicente.

All that information was not presented to you. So that was one of the many rebuttals we had, but I thank you for your time.

COMMISSION PRESIDENT MILOFSKY: Thank you. Thank you.

MR. BLUE: Good morning. First of all, the --

COMMISSION PRESIDENT MILOFSKY: Name, please?

MR. BLUE: Robert Blue. It is not a nuisance property. In the last 13 years there's only been one police report according to LAPD West LA Division senior lead officer Matthew Kirk. And that's shown on the second page of our submittal.

The economic analysis is flawed. It failed to look at the minimum cost estimate to bring the building into compliance with the soft story ordinance. The estimate was padded with -- including a

discussion of ADA compliance for restrooms. The issue as an example could be addressed by repurposing the ground floor restroom as a gender neutral restroom, which is normally done.

The report failed to address any of the grandfathering in permit requirements based on the year the building was built. All the money spent on consulting services and fees for this stretched out CEQA process could have been applied to offset the minimum cost to build the building into compliance.

The applicant has stated their intent to sell. In the staff report it says that. And the buyer of the building could -- which would be sold with the bundling surrounding properties, could present a project that incorporates a restored Barry Building into a new project that serves the community and will be an economic benefit for the city.

COMMISSION PRESIDENT MILOFSKY: Thank you. And I assume there's hands raised.

MS. SIMPSON: Tiana Simpson, for the record. We do have callers at this time. Toby, you are now able to speak. Please --

MS. BRISKI: Hang on. Ari Briski, for the record. Pardon the interruption. It seems like we do have another individual who was hoping to speak in person.

Have you submitted a speaker card? Okay. Please allow us a moment to sort through here.

COMMISSION PRESIDENT MILOFSKY: Yes. We do have one more person here. Lauren Cole [sp]?

MS. COLE: Before I start, I had -- I'm here representing the South Brentwood Residents Association. And I had asked for two minutes. Brentwood doesn't have a certified neighborhood council. And I was told because we're not certified, I can't have two minutes. But I've come all the way downtown representing our neighborhood group. Is it possible to get two minutes?

COMMISSION PRESIDENT MILOFSKY: No.

MS. COLE: Okay. Be quick then. Lauren Cole, president of South Brentwood Residents Association. We're the neighborhood group that's been around for approximately 50 years, that represents South Brentwood from San Vicente to Wilshire, and all multifamily buildings in Brentwood.

South Brentwood is a walkable community. And we're the group that represents everyone who lives within walking distance of San Vicente. People live in the area because it's walkable. And we have amenities along most of San Vicente. SBRA is strongly in support of demolishing this building. This building has been a

blight on our community for about 15 years now, even prior to the Green Hollow Square project that was a tired property. We were supportive of building a more neighborhood facing and economically viable project there.

As you've heard, the building is not seismically sound. We've also heard about it's not ADA compliant. For the last 15, 20 years, it's been vandalized. We have a big safety concern that unhoused individuals will start a fire that will spread to other buildings. And can I also -- sorry, one more point.

Even when the request was made 20 years ago that the building become historically cultural, it wasn't because of the building. Neighborhood residents had what turned out to be a misguided thought that it would save the independent books- -- which closed in 2008. So even before Green Hollow Square --

COMMISSION PRESIDENT MILOFSKY: Thank you.

MS. COLE: Thank you very much.

COMMISSION PRESIDENT MILOFSKY: Tiana?

MS. SIMPSON: Tiana Simpson, for the record. Toby, you are now able to speak. Please press unmute.

MR. MURESIANU: Hi. My name is Toby Muresianu. I am a volunteer with Westside for Everyone and a former board member of the South Brentwood Residents

Association. I also support demolishing this building. I think there is an overriding concern here.

Namely there's a school nearby that's at 30 percent of capacity, the Brentwood Science Magnet Elementary School. And it fits the pattern of all over LA, schools have declining enrollment because families can't afford to live there. I myself no longer live in the area because there were no family sized apartments available once I had children. So I had to move.

But while I lived there, I used to give people tours of Brentwood. And I would point out that when they were standing in front of the Barry Building, it was a cultural landmark. And they would laugh because it's ridiculous. It's a small, frankly ugly building. And there's a thousand others that look like it in LA.

If there's an architectural significance to it, the right way to preserve it is in a book or a website for people who are interested in that sort of thing, where they can see it as it was in its heyday, not as it is now.

MS. SIMPSON: Okay. Tiana Simpson, for the record. Next caller, Wendy, you're now able to speak. Please press unmute.

MS. ROSEN: Hi, can you hear me?

MS. SIMPSON: Yes.

MS. ROSEN: Great. My name is Wendy Rosen. And I actually was chair of the Brentwood Community Council when this building was designated. There was overwhelming support to designate this building, not for the reasons that Lauren Cole just suggested, but because this was a very beautiful and rare example of midcentury modern architecture.

This is a very rare example in a business district. This is an absolutely stunning building. Unfortunately the owner has let it go to neglect. And they have done that so that they can bypass CEQA requirements to actually bring a -- an alternative project that would be viable. And they can sell it for more money with no encumbrance of CEQA review required.

I ask that you support the request to not allow the demolition of this incredible building and preserve historic resources, and set a precedent showing that the city does value its historic jewels. Thank you.

MS. SIMPSON: Next caller, Jean Frost. You are now able to speak. Please press unmute.

MS. FROST: Jean Frost. I am here representing the West Adams Heritage Association. I strongly support the staff report that urges you not to adopt a

Statement of Overriding Considerations. It certainly is not justified by the facts. And it would set a very negative precedent for historic cultural monuments and the bar with which a Statement of Overriding Considerations could be adopted.

This is a really significant act. And the facts do not support such adoption. I also support the comments regarding the trees, done by HRG. West Adams Heritage has dozens of cultural monuments. And taking such a step, which is due to really the neglect of the owner and [inaudible] hardship, the Statement of Overriding Considerations ought not to be adopted. Thank you.

MS. SIMPSON: Caroline, you are now able to speak. Please press unmute.

MS. JORDAN: Hello. Thank you. My name's Caroline Jordan. I chair the Brentwood Community Council, but I'm here today speaking just as an individual. It is time to put this building out of its misery. It has -- it is and has been for quite some time nothing more than an attractive nuisance. It is time to be able to activate this area of San Vicente and bring life back to our small commercial corridor.

I ask this Commission to allow for the overriding circumstances and let the applicant move forward with

getting something better in this area for the community. This building is a duplicate of one that the architect had built in Hawaii. And it has already been demolished without any of this hoopla in Hawaii. It was not recognized as significant or important. Thank you.

MS. SIMPSON: Jake, you are now able to speak. Please unmute yourself.

MR. PIERCE: Hello. Yes. My name is Jake Pierce, field organizer for Abundant Housing LA, speaking in support of the demolition. Structural -- the building is unfit. Structural experts and the city of Los Angeles have determined that the Barry Building is structurally unfit and likely to suffer severe damage in an earthquake.

I mean, can you imagine what would happen if there were an earthquake and it collapsed and hurt somebody? There was a comment from staff that we should take it as a sign this building is structurally sound, that it has withstood previous earthquakes. If that's part of the reasoning, I don't know why we have, you know, structural standards in the first place and a retrofit program. You know, the fact is we're due for a much bigger earthquake than anything we experienced in the '70s or '80s.

I also think that this is an opportunity to imagine something that would be much better for the community, that would make it more walkable and more affordable. Thank you so much.

MS. SIMPSON: Next caller, Michael Freeman. You are now able to speak. Please unmute yourself.

MR. FREEMAN: Hi there. My name is Michael Freeman. I'm currently a renter in Brentwood and have lived there and rented there for over 12 years. And I want to voice my support for the demolition of the Barry Building. I value history and I value monuments. But this is absurd.

In the 12 and a half years I've lived in Brentwood, I saw a coffee shop a little over eight years ago, I think. And for the last many years it's been in disrepair. Not a single person I know in the neighborhood or anybody I've been on walks with has ever commented on the architectural value of the place or mentioned Dutton's Brentwood Bookstore. We're talking about preserving a building for a bookstore that no longer exists.

And all of this would not be that big of a deal if we weren't in the middle of a housing crisis. We are tired of having developments like this be derailed due to these very thin reasons like cultural heritage.

This building is not something that any of us have heard of. I urge you -- I urge you to allow development. Thank you.

MS. SIMPSON: Next caller, Liam, you are now able to speak. Please unmute yourself.

MR. LIAM: Hey everyone. I'm Liam. I've lived on the westside for four years now. And I also am going to disagree with the staff. I think that the overriding considerations here are very obvious that demolition is the correct course of action here. The alternatives presented by staff aren't realistic. The actual alternative to demolition is the status quo.

The -- this building remains vacant. And San Vicente has a building in disrepair, instead of commercial properties or apartments that are actually going to be used. A building that is going to be more environmentally friendly could be built. A building that is more accessible to disabled and elderly people could be built. And that's the -- the alternative that -- that, you know, I'm imagining for San Vicente, and the westside, and CD11. Thank you.

MS. SIMPSON: Next caller, Steven. You are now able to speak. Please unmute yourself.

MR. LUFTMAN: Hello. Steven Luftman [sp] speaking against demolition. The Barry Building made an

impressive contribution to Los Angeles' leadership in postwar modern architecture, made all the more important considering the building's architect, Milton Caughey, a graduate of the prestigious Yale School of Architecture, died at only 46.

It would be a grave injustice of Los Angeles architectural history to reward the current owner's own neglect by issuing a Statement of Overriding Consideration. The building was once a center of cultural activity on the westside of the city. Rejecting this outrageous request is the first step in returning the Barry Building to its vibrant future. Thank you.

MS. SIMPSON: Next caller, Bruce. You are now able to speak. Please unmute yourself.

MR. POMP: Hello. My name is Bruce Pomp [sp]. And I live on Saltair Terrace, directly north and behind the Barry property. I also studied architecture and town planning at Yale. And I strongly urge the demolition of this building.

My takeaway from what I've heard at this hearing, is retaining the Barry Building as a historical property is not feasible or economic. The current situation of having this building remaining unoccupied, which is the status quo, is unacceptable.

And it's a danger to the neighborhood. It's been an eyesore. I've seen vagrants enter the property even though it's double fenced. There's been graffiti and broken windows.

A vacant lot would be much safer and open the project to future development. And I love the idea of incorporating the architectural elements of the Barry Building, which would pay homage to this historical site. So again, I strongly urge the demolition.

MS. SIMPSON: Next caller, Pamela Brown. You are now able to speak. Please unmute yourself.

MS. BROWN: Hi. Pamela Brown, Brentwood Community Council board member, but here speaking as an individual who has lived two blocks from the Barry Building for 30 years. I was in support of it being demolished and developed with a nice mixed use building back in 2008 and 2009. It has done nothing but fall into disrepair.

Please allow the demolition. I pass by it at least twice a day. I -- I'm a realtor who, when people move into the area, they question what is up with that building. And when I say it was designated historical because there was Dutton's Books, nobody knows what that is except for people who have been here decades long.

So you know, future development is necessary and important. And the city needs to support the demolition, so that mixed use and housing can be created, and the site can look beautiful once again.

MS. SIMPSON: Next caller, caller ending in 3713. You are now able to speak. Please unmute yourself.

MS. RUTH: Hi. This is Ruth. I'm an unhoused person living in the city of LA in public. And I just am so tired of seeing all these beautiful buildings fall into disrepair when they can be occupied and held vacant. All these beautiful buildings are held vacant, when people could be living or -- or working in them and restoring them.

And I want to see this building not fenced off, not vacant, not falling into disrepair. But I want to see people restore it, and occupy it, and use it. Thank you.

MS. SIMPSON: Next caller, caller ending in 5540. You are now able to speak. Please unmute yourself.

MR. HANES: Good morning. My name is Doug Hanes. I ask that this Commission not recommend certification of the EIR despite the very thorough staff report. CEQA requires a finite project description main- -- and maintain a vacant dirt lot in one of the most expensive locations in the United States is not what I

would call a plausible project, particularly in light of a prior application to develop the site that was submitted by the owner and then taken out.

Without a realistic project description, an accurate alternatives analysis cannot be determined that would incorporate the Barry Building. The EIR is therefore fatally flawed and should be rejected. And I'm going to point out the obvious, which I'm sure all the members of the Commission are aware of because I hear this all the time. All the arguments being made by the applicant's representative can be made for any project, where the owner doesn't want the historic status.

And I'm reminded of the Cinerama Dome. I heard all these arguments before. None of them were plausible. And instead all they did is undermine the process that we have in order to keep this [inaudible] --

MS. SIMPSON: Time.

MR. HANES: -- wonderful city. Thank you.

MS. SIMPSON: Next caller, Chris B. You are now able to speak. Please unmute yourself.

MR. BELL: Hello My name is Chris Bell. I live down the street from the Barry Building and work for a nearby property owner. I'm speaking in strong demoli-

-- strong support of demolition. I walk past this building almost daily. The building is obsolete and extremely unsightly. It has become a nuisance to the local residents and the San Vicente businesses.

This building has been a blight on the community for many years. The applicant should be allowed to proceed with demolition. Thank you.

MS. SIMPSON: Next caller, Matt. You are now able to speak. Please unmute yourself.

MR. MATT: Hi. I've lived in the Brentwood community for 25 years. Really the only good thing about the Barry Building was Dutton's. And Dutton's is long gone. The idea that this is just a part of some cultural heritage is really -- I'm sorry, is just pedantic. It's been an eyesore for the last 15 years. It'll continue to be an eyesore if you don't demolish it.

So let's work together as a community to build something responsible, and useful, and hopefully beautify the -- the neighborhood. Thank you.

MS. SIMPSON: Tiana Simpson, for the record. That concludes our callers at this time.

COMMISSION PRESIDENT MILOFSKY: I believe the council office would like to make a statement.

MR. SILVA: Good morning. President Milofsky,

honorable Commissioners. My name is Sean Silva, speaking on behalf of the office of councilman Traci Park. Thank you allowing me to speak before you again today. I'm here to relay our office's support for the certification of the EIR and a recommendation to adopt a Statement of Overriding Consideration for the property known as the Barry Building.

As this Commission well knows, we are wholly invested in the work of preserving and protecting our city's eclectic trove of historic cultural resources. From the New Bethel Baptist Church, and the Arthur Lloyd Reese home in Venice, the Venice lifeguard tower, to the last home of Marilyn Monroe, we have been active and thoughtful stewards of our district's history.

We have considered the Barry Building site conditions and heard from the community as well. We have worked with the property owners to establish a preservation covenant that ensures the safeguarding of the site's iconic elements, including the staircases and benches. These elements are to be used in the site's future development, paying homage to the Barry Building.

We respectfully request that this Commission certify the EIR and recommend -- recommend

certification of the EIR and a support for a Statement of Overriding Considerations, to acknowledge the potential for this site to be transformed into something that better serves the community. Thank you for your time and consideration of the comments I've made here.

COMMISSION PRESIDENT MILOFSKY: Thank you. All right. Seeing no other public comment, hands raised, let's close public comment to this item. Commissioners? I've got a question for staff. In Melissa's presentation she noted several properties surrounding the Barry Building are owned by the -- under the same ownership. The owner's representative denied that. Can you elaborate on -- on that ownership?

MS. JONES: Yes. Melissa Jones, Office of Historic Resources, for the record. In response to that question, we looked in our zoning and information map access system, known as ZIMAS, which shows assessor records, looking at each of the individual parcels that I highlighted in my presentation that shows that they are under the same exact ownership as the Barry Building. That was verified.

COMMISSION PRESIDENT MILOFSKY: Okay. So the Barry Building really isn't a standalone parcel of 0.6

acres. It's part of a much larger assemblage of parcels.

MS. JONES: It's -- those are all separate parcels. They're not -- they're not part of the same parcel within the same APN number. They're different APN numbers. But they are all owned by the same entity that owns the Barry Building.

COMMISSION PRESIDENT MILOFSKY: But they -- they could be potentially lock tied into a single parcel and developed for housing, which some -- some people, some callers have mentioned --

MS. JONES: Yes. That's a possibility. That would be a separate action. But yes, that -- that could be potentially a possibility.

COMMISSION PRESIDENT MILOFSKY: And -- and possibly even subterranean parking could be accessed through one of those other parcels.

MS. JONES: That's -- that's true. Yes. And that, actually to confirm, so that footprint of the existing buildings that I showed on my presentation, it's actually the exact footprint of the previously proposed project, the Green Hollow Square project was on -- proposed for those same sites.

COMMISSION PRESIDENT MILOFSKY: Okay.

MS. JONES: To further emphasize that those were

-- are owned by the same property owner that owns the Barry Building.

COMMISSION PRESIDENT MILOFSKY: Okay.

MS. JONES: Thank you.

COMMISSION PRESIDENT MILOFSKY: I guess in part, I tend to agree with the 2009 Commission letter. I don't think anything has been stated today that sort of leads me to believe that there's overriding considerations on this. I think what I'm seeing an example of, which is a very bad precedent for the city to start looking at, is demolition by neglect.

If a lot of buildings sit vacant long enough and don't take care of it, it won't fall down on its own. Which in fact raised me -- led me to raise the question to staff when we had a -- a prior meeting, which is if demolition is caused by neglect, is that -- is that subject to the scorched earth policy. And the answer was no.

But I think it's something that the city might want to take a look at in terms of not encouraging properties to remain vacant, unmaintained, and a blight on their neighborhood, and therefore causing demolition. Richard?

COMMISSIONER BARRON: Yeah. The point I was going to bring it up too, demolition by neglect. Demolition

by neglect is a developer strategy that helps get neighborhoods supportive of the demolition because the building has gone to hell in a handbasket. And so now you have a lot of people calling the council office complaining about the neglected building.

As I said before, my office did several buildings like this in terms of adaptive reuse. And it's quite possible that this building could be brought back to its former glory. It's only been hurt by the -- by the demolition by neglect, which has only increased sort of the problems associated with rehabbing the building.

And so I'm supportive of the staff's proposal and -- and their thinking, that we should certify the -- the EIR and not deal with the overriding circumstances.

COMMISSION VICE PRESIDENT KENNARD: The arguments from the staff were persuasive for me. I'm very moved by the issue that Commissioner Barron just spoke about of demolition by neglect, request for demolition. I'm also a strong proponent of modernist architecture. And I believe that it's one of the fewest, as it was pointed out in the staff recommendation, commercial modernist buildings are not very common.

And we had this nomination. I was not on the

Commission when it was designated. But I would have supported that designation of this building as an example of modernist architecture. So I support both recommending -- approving the EIR and also against the demolition.

COMMISSION PRESIDENT MILOFSKY: Commissioner Buelna?

COMMISSIONER BUELNA: Yeah. I was interested to hear the community and they're split. But I'm going to be supportive of no demolition.

COMMISSION PRESIDENT MILOFSKY: Commissioner Kanner?

COMMISSIONER KANNER: Yeah. It's unfortunate that this, as a courtyard building, most of the architectural attributes are not seen by the public. What they see is the exterior, which evidently has been altered, some of the windows, the coverings of the windows, which added to its international style, have been removed. So what the public sees is an abandoned building with fences around it. And obviously that's not a welcome to my neighborhood type of a image, especially for upscale Brentwood.

But it's not the building that has allowed itself to deteriorate. It's the property owner. And I feel that we as a landmark board, we are the people that

have the expertise to understand what is significant and what isn't. And we are the -- I wouldn't say the last word, it obviously goes on to other, you know, city entities. But some of us are architects, some of us are historians. And we've looked at the report. The report, in case the public isn't aware, was about 288 pages long.

And I think it's very clear that the deep pockets property owner has kind of thumbed their nose -- noses -- nose or noses, at preservationists. And in the process has gained support from -- from the community, the Brentwood community, which would like to see something more attractive. And, you know, who knows what'll happen someday. But right now we have to -- I think we have to stay with the opinion that we made in 2007, and recognize that this is a historic structure that needs protection.

COMMISSION PRESIDENT MILOFSKY: Thank you. I'd also like to note that a vacant lot with a chain link fence is no -- no great contributor to the public environment. In fact, it's an attractive nuisance and will probably attract homeless tents in front of it. So I don't see that demolition is -- is remotely alternative in terms of improving the quality, the context of that neighborhood.

Commissioners, do I have motion on either item?

COMMISSIONER BARRON: Richard Barron. I'll move that we -- on the Barry Building, case number 2007-1585, at 11973 San Vicente Boulevard, that we certify the EIR and we not adopt the Statement of Overriding Considerations, and adopt the report findings.

COMMISSION PRESIDENT MILOFSKY: You want to make that into two motions?

COMMISSIONER BARRON: Hmm?

COMMISSION PRESIDENT MILOFSKY: You want to make that into two separate motions?

COMMISSIONER BARRON: Do we need two separate motions?

COMMISSION PRESIDENT MILOFSKY: Sure.

COMMISSIONER BARRON: He's saying no.

COMMISSION PRESIDENT MILOFSKY: Okay.

MALE: You don't. You might want to just clarify the language that you're recommending to the Department of Building and Safety that they certify the EIR. And -- and you're also recommending to the Department of Building and Safety that they not adopt a Statement of Overriding Considerations.

COMMISSION PRESIDENT MILOFSKY: Well said.

COMMISSIONER KANNER: Commissioner Kanner, I second.

COMMISSION PRESIDENT MILOFSKY: Okay. Ari?

MS. BRISKI: Commissioner Barron?

COMMISSIONER BARRON: Yes.

MS. BRISKI: Commissioner Kanner?

COMMISSIONER KANNER: Yes.

MS. BRISKI: Commissioner Buelna?

COMMISSIONER BUELNA: Yes.

MS. BRISKI: Commission Vice President Kennard?

COMMISSION VICE PRESIDENT KENNARD: Yes.

MS. BRISKI: Commission President Milofsky?

COMMISSION PRESIDENT MILOFSKY: Yes.

MS. BRISKI: The motion carries.

COMMISSION PRESIDENT MILOFSKY: Okay. Thank you. And next regular meeting of the Cultural Heritage Commission will be held Thursday, September 19th, 10:00 a.m., Los Angeles City Hall, Room 1010. And we are adjourned at 11:52.

I, Carlo Craig, a transcriber, hereby declare under penalty of perjury that to the best of my ability the above 66 pages contain a full, true and correct transcription of the audio recording that I received regarding the event listed on the caption on page 1.

I further declare that I have no interest in the event of the action.

July 2, 2025

Carlo Craig

X_____

(https://planning.lacity.gov/plndoc/Audio/CHC/2024/09-05-2024/4_CHC_2007_1585.mp3)

Veronica Lopez <veronica.lopez@lacity.org>

Public Comments Regarding BF# 250851, The Barry Building Demolition Project

1 message

Bob Blue <bob.blue@live.com> Sun, Jul 20, 2025 at 9:51 PM
To: Veronica Lopez <veronica.lopez@lacity.org>
Cc: Ziggy Kruse <ziggykruse2005@yahoo.com>, Hydee Feldstein-Soto <hydee.feldsteinsoto@lacity.org>, Kenneth Fong <kenneth.fong@lacity.org>, "Corin L Kahn, Esq." <clkesq@outlook.com>, "osama.younan@lacity.org" <osama.younan@lacity.org>

Hello Veronica,

Attached please find a PDF file (*2025-07-20_Ltr. to LADBS_Public Comments in Support of Appeal of LOD, EIR, SOC_Final.pdf*) of our public comments for the LADBS Board of Commissioners.

Please add this document to LADBS' case file #BF250851, and also distribute it to all commissioners prior to the hearing for this case.

Also, please acknowledge receipt of this email and attachment. Thank you.

Sincerely,
Bob Blue

2025-07-20_Ltr. to LADBS_in Support of Appeal of LOD, SOC_Final Draft_WITH Attachments.pdf
15115K

APPENDIX A

REQUEST FOR MODIFICATION OF BUILDING ORDINANCES

UNDER AUTHORITY OF L.A.M.C. SECTION 98.0403

DEPARTMENT OF BUILDING AND SAFETY

PERMIT APP. #: 19019-10000-05593; Letter of Determination from Binh Phan (attached)	**DATE:** 07/08/2025	**For City Dept. Use Only** Building (Zoning) Grading Shoring Mech. Elec. Plumb. Green D.A. Misc.
JOB ADDRESS: 11973-11975 W San Vicente Boulevard		
Tract: West gate acres	**Block:** None **Lot:** 51 and 52	
Owner: 11973 San Vicente LLC	**Petitioner:** Angelenos for Historic Preservation, c/o Susan Brandt-Hawley	
Address: C/o Alston & Bird Attn: Ed Casey	**Address:** PO Box 1659; susanbh@me.com	
City: Los Angeles; State: CA; Zip: 90071; Phone:	City: Glen Ellen; State: CA; Zip: 95442; Phone: (707) 938-3900	

REQUEST (SUBMIT PLANS OR ADDITIONAL SHEETS AS NECESSARY)

Appeal of the 06/06/2025 Letter of Determination (Attached)

CODE SECTIONS: LABC section 106.4.5

JUSTIFICATION (SUBMIT PLANS OR ADDITIONAL SHEETS AS NECESSARY)

See attached letter "Justifcation for Appeal of Letter of Determination"

Susan Brandt-Hawley — Owner/Petitioner Name (Print) | (Signature) | Attorney for Petitioner — Position

FOR CITY DEPARTMENT'S USE ONLY BELOW THIS LINE

Concurrences required from the following Department(s)			Approved	Denied
☐ Los Angeles Fire Department	Print Name	Sign	☐	☐
☐ Public Works Bureau of Engineering	Print Name	Sign	☐	☐
☐ Department of City Planning	Print Name	Sign	☐	☐
☐ Department of County Health	Print Name	Sign	☐	☐
☐ Other _____	Print Name	Sign	☐	☐

DEPARTMENT ACTION

☐ GRANTED ☒ DENIED

Sai Khum — Reviewed by: (Staff) (Print) — Sign — Date: 7/9/25

Sai Khum — Action taken by: (Supervisor) (Print) — Sign — Date: 7/9/25

NOTE: IN CASE OF DENIAL, SEE PAGE #2 OF THIS FORM FOR APPEAL PROCEDURES

CONDITIONS OF APPROVAL (Continued on Page 2):

FEES (DEPARTMENT USE ONLY)

Appeal Processing Fee.. (No. of Items) =	1 X $130 + $39/addl	=	130.00
Inspection Fee ..... (No of Insp.) =	X $ 84.00	=	
Research Fee ... (Total Hours Worked) =	2 X $104.00	=	208.00
Subtotal.....		=	338.00
Development Services Center Surcharge	X .03	=	10.14
Systems Development Surcharge	X .06	=	20.28
Total Fees.....		=	368.42

Fees verified by:

Print and Sign: Sai Khum

For Cashiers Use Only

(PROCESS ONLY WHEN FEES ARE VERIFIED)

Modification number: 19230

Payment date: 7/9/25

Receipt number: 2133638

Sai Khum <sai.khum@lacity.org>

LADBS - Payment for Modification Fee at 11973 W SAN VICENTE BLVD 90049

1 message

ladbs.e-permit@lacity.org <ladbs.e-permit@lacity.org> Wed, Jul 9, 2025 at 10:31 AM
To: susanbh@me.com, sai.khum@lacity.org
Cc: ladbs.e-permit@lacity.org

To Susan Brandt-Hawley,

LADBS has received your Modification request and payment.

Work Site:	**11973 W SAN VICENTE BLVD 90049**
Permit Number:	**19019-10000-05593**
Modification Number:	**19230**
Modification Description:	**Appeal of the 06/06/2025 Letter of Determination**

Payment Date:	**07/09/2025 10:31:28**
Receipt Number:	**2133638**
Payment Amount:	**$368.42**

Thank you for doing business with the City of Los Angeles.
Department of Building and Safety
City of Los Angeles
www.ladbs.org

This is an automated email. Please do not reply to this email.

Permit App #: 19019-10000-05593; Letter of Determination from Binh Phan (attached)	**Job Address:** 11973-11975 W San Vicente Boulevard

CONDITIONS OF APPROVAL (Continued from Page 1)

CITY OF LOS ANGELES
BOARD OF BUILDING AND SAFETY/DISABLED ACCESS COMMISSION APPEAL FORM

(Must be Attached to the Modification Request Form, Page 1)

AFFIDAVIT – LADBS BOARD OF BUILDING AND SAFETY COMMISSIONERS – RESOLUTION NO. 832-93

I, _____ do state and swear as follows:
(Print or Type Name of the Person Signing this Form)

1. The name and mailing address of the owner of the property (as defined in the resolution 832-93) at _____ as shown on the appeal application (LADBS Com 31) are correct, and
2. The owner of the property as shown on the appeal application will be made aware of the appeal and will receive a copy of the appeal.

I declare under PENALTY OF PERJURY that the forgoing is true and correct.

Owner's Name(s) _____ _____
(Please Type or Print) (Please Type or Print)

Owner's Signature(s) _____ (Two Officers' Signatures Required for Corporations)
(Please Sign)

Name of Corporation _____ _____
(Please Print Name of Corporation) (Please Type or Print)

Dated this _____ day of _____ 20_____

CALIFORNIA ALL-PURPOSE ACKNOWLEDGEMENT----------SIGNATURE(S) MUST BE NOTARIZED

State of CALIFORNIA County of _____ on _____

before me, _____, personally appeared _____,
Name, Title of Officer (e.g. Jane Doe, Notary Public) Name(s) of Signer(s)

who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument in person(s), or the entity upon behalf of which the person(s) acted, executed the instrument. **I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing is true and correct.**

WITNESS my hand and official seal. Signature _____

As a covered entity under Title II of the Americans with Disabilities Act, the City of Los Angeles does not discriminate on the basis of disability and, upon request, will provide reasonable accommodation to ensure equal access to its programs, services and activities.

APPEAL OF DEPARTMENT ACTION TO THE BOARD OF BUILDING AND SAFETY COMMISSIONERS/DISABLED ACCESS APPEALS COMMISSION

Susan Brandt-Hawley	Attorney for Petitioner
Applicant's Name	Applicant's Title
Signature	Date

FEES **(DEPARTMENT USE ONLY)**

Board Fee ..... (No. of Items)	1	X $354 +$215/addl	=	354.00
Inspection Fee ..... (No of Insp.) =		X 84.00	=	0.00
Research Fee ... (Total Hours Worked) =	2	X 104.00	=	208.00
Subtotal			=	562.00
Development Services Center Surcharge		X .03	=	16.86
Systems Development Surcharge		X .06	=	33.72
Total Fees			=	612.58

Fees verified by:

Print and Sign _____

For Cashiers Use Only
(PROCESS ONLY WHEN FEES ARE VERIFIED)

CITY LA DBS
DEPARTMENT OF BUILDING AND SAFETY

CITY OF LOS ANGELES
DEPARTMENT OF BUILDING AND SAFETY
SPECIAL FEES

Board File #	
Council District #	CD 11
District Office	Metro
Plan Check #	B19LA23745
Permit #	19019-10000-05593

JOB ADDRESS: 11973-11975 (NUMBER) W. (DIRECTION) San Vicente (STREET NAME) Blvd. (STREET TYPE)

PROPERTY OWNER/APPLICANT:

Name: Angelenos for Historic Preservation,c/o Susan Brandt-Hawley

Address: PO Box 1659 City: Glen Ellen Zip: 95442

Telephone: (707) 938-3900 Email: susunbh@me.com

BUREAU	TYPE	ACTIVITY
☐ Inspection ☒ Engineering ☐ Code Enforcement ☐ Resource Mgt. ☐ Commission	☐ Residential ☒ Non-Residential	☒ Building ☐ Earthquake ☐ Grading ☐ Elevator ☐ Pressure Vessel ☐ Other _____ ☐ Electrical ☐ Plumbing ☐ Heating ☐ Electrical Test Lab ☐ Mechanical Test Lab

PURPOSE: Fees for written report pursuant to LAMC 98.0415 (f)

FEE

Board Field Inspection LAMC 98.0403.2(a	
Supplemental Inspections LAMC 98.0412:	
Minimum Inspection	
Additional Inspection	
Misc. Permit Inspection	
Special Equipment	
Off-Site Inspection	
Witnessing Performance Test	
Off-Hours Inspection LAMC 98.0406:	
Minimum Fee	
Over Min. @ $____/hr x___hrs	$0.00
Investigation LAMC 98.0402	
Supplementary Time Charges 4x $ 104/hr.	416.00
Pre-Inspection Fee	
Written Report Fee	
Other	

Distribution: Bureau - White
Customer - Yellow
Cashier - Pink

SUBTOTAL (Applicable surcharges will be added by cashier) 416.00

Fee Determination by: Sai Khum
Employee I.D. #: 294878
Telephone: 213-202-9927
Date: 7/9/2025
Off-Hours Approved by: _____ (Attach copy to approved OT request)
Date Inspection Requested: _____

Cashier's Use Only:

Research Fee = 416.00
Developmental Services Center Surcharge (3%) = 12.48
System Development Surcharge (6%) = 24.96
Total Fees 453.44

MISC/Form.06 (Rev. 12/2012)

Mod. # 19234
Receipt # 2133896

www.ladbs.org

Sai Khum <sai.khum@lacity.org>

LADBS - Payment for Modification Fee at 11973 W SAN VICENTE BLVD 90049

1 message

ladbs.e-permit@lacity.org <ladbs.e-permit@lacity.org> Wed, Jul 9, 2025 at 1:28 PM
To: susanbh@me.com, sai.khum@lacity.org
Cc: ladbs.e-permit@lacity.org

To Susan Brandt-Hawley,

LADBS has received your Modification request and payment.

Work Site:	**11973 W SAN VICENTE BLVD 90049**
Permit Number:	**19019-10000-05593**
Modification Number:	**19234**
Modification Description:	**Fees for written report pursuant to LAMC Section 98.0415 (f)**

Payment Date:	**07/09/2025 13:28:36**
Receipt Number:	**2133896**
Payment Amount:	**$453.44**

Thank you for doing business with the City of Los Angeles.
Department of Building and Safety
City of Los Angeles
www.ladbs.org

This is an automated email. Please do not reply to this email.

REQUEST FOR MODIFICATION OF BUILDING ORDINANCES

UNDER AUTHORITY OF L.A.M.C. SECTION 98.0403

PERMIT APP. #: 19019-10000-05593; Letter of Determination from Binh Phan (attached)	**DATE:** 07/08/2025	**For City Dept. Use Only** Building Zoning Grading Shoring Mech. Elec. Plumb. Green D.A. Misc.
JOB ADDRESS: 11973-11975 W San Vicente Boulevard		
Tract:	**Block:** **Lot:**	

Owner: 11973 San Vicente LLC	Petitioner: Angelenos for Historic Preservation, c/o Susan Brandt-Hawley
Address: C/o Alston & Bird Attn: Ed Casey	Address: PO Box 1659; susanbh@me.com
City: Los Angeles; State: CA; Zip: 90071; Phone:	City: Glen Ellen; State: CA; Zip: 95442; Phone: (707) 938-3900

REQUEST (SUBMIT PLANS OR ADDITIONAL SHEETS AS NECESSARY)

CODE SECTIONS: LABC section 106.4.5

Appeal of the 06/06/2025 Letter of Determination (Attached)

JUSTIFICATION (SUBMIT PLANS OR ADDITIONAL SHEETS AS NECESSARY)

See attached letter "Justifcation for Appeal of Letter of Determination"

Susan Brandt-Hawley — Owner/Petitioner Name (Print)

(Signature)

Attorney for Petitioner — Position

FOR CITY DEPARTMENT'S USE ONLY BELOW THIS LINE

Concurrences required from the following Department(s)			Approved	Denied
☐ Los Angeles Fire Department	Print Name	Sign	☐	☐
☐ Public Works Bureau of Engineering	Print Name	Sign	☐	☐
☐ Department of City Planning	Print Name	Sign	☐	☐
☐ Department of County Health	Print Name	Sign	☐	☐
☐ Other _____	Print Name	Sign	☐	☐

DEPARTMENT ACTION

☐ GRANTED ☐ DENIED

Reviewed by: (Staff) (Print) *Sign* *Date*

Action taken by: (Supervisor) (Print) *Sign* *Date*

NOTE: IN CASE OF DENIAL, SEE PAGE #2 OF THIS FORM FOR APPEAL PROCEDURES

CONDITIONS OF APPROVAL (Continued on Page 2):

For Cashiers Use Only
(PROCESS ONLY WHEN FEES ARE VERIFIED)

(DEPARTMENT USE ONLY)

FEES

Appeal Processing Fee.. (No. of Items) =	1	X $130 + $39/addl	= 130.00
Inspection Fee ..... (No of Insp.) =		X $ 84.00	=
Research Fee ... (Total Hours Worked) =	2	X $104.00	= 208.00
Subtotal			= 338.00
Development Services Center Surcharge		X .03	= 10.14
Systems Development Surcharge		X .06	= 20.28
Total Fees			= nan

Fees verified by:

Print and Sign _____

CONDITIONS OF APPROVAL (Continued from Page 1)

CITY OF LOS ANGELES
BOARD OF BUILDING AND SAFETY/DISABLED ACCESS COMMISSION APPEAL FORM

(Must be Attached to the Modification Request Form, Page 1)

AFFIDAVIT – LADBS BOARD OF BUILDING AND SAFETY COMMISSIONERS – RESOLUTION NO. 832-93

I, _____ do state and swear as follows:
(Print or Type Name of the Person Signing this Form)

1. The name and mailing address of the owner of the property (as defined in the resolution 832-93) at _____ as shown on the appeal application (LADBS Com 31) are correct, and
2. The owner of the property as shown on the appeal application will be made aware of the appeal and will receive a copy of the appeal.

I declare under PENALTY OF PERJURY that the forgoing is true and correct.

Owner's Name(s) _____ _____
(Please Type or Print) (Please Type or Print)

Owner's Signature(s) _____ (Two Officers' Signatures Required for Corporations)
(Please Sign)

Name of Corporation _____ _____
(Please Print Name of Corporation) (Please Type or Print)

Dated this _____ day of _____ 20_____

CALIFORNIA ALL-PURPOSE ACKNOWLEDGEMENT----------SIGNATURE(S) MUST BE NOTARIZED

State of **CALIFORNIA** County of _____ on _____

before me, _____, personally appeared _____,
Name, Title of Officer (e.g. Jane Doe, Notary Public) Name(s) of Signer(s)

who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument in person(s), or the entity upon behalf of which the person(s) acted, executed the instrument. **I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing is true and correct.**

WITNESS my hand and official seal. Signature _____

As a covered entity under Title II of the Americans with Disabilities Act, the City of Los Angeles does not discriminate on the basis of disability and, upon request, will provide reasonable accommodation to ensure equal access to its programs, services and activities.

APPEAL OF DEPARTMENT ACTION TO THE BOARD OF BUILDING AND SAFETY COMMISSIONERS/DISABLED ACCESS APPEALS COMMISSION

Susan Brandt-Hawley — Applicant's Name
Attorney for Petitioner — Applicant's Title
Signature
Date

FEES **(DEPARTMENT USE ONLY)**

Board Fee ..... (No. of Items)	1	X $354 +$215/addl	=	354.00
Inspection Fee ..... (No of Insp.) =		X 84.00	=	0.00
Research Fee ... (Total Hours Worked) =	2	X 104.00	=	208.00
Subtotal			=	562.00
Development Services Center Surcharge		X .03	=	16.86
Systems Development Surcharge		X .06	=	33.72
Total Fees			=	612.58

Fees verified by:

Print and Sign _____

For Cashiers Use Only
(PROCESS ONLY WHEN FEES ARE VERIFIED)

SUPPLEMENTAL APPLICATION FOR APPEALS

TYPE OF APPEAL:

- ☐ BUILDING CODE APPEAL
- ☐ ZONING CODE APPEAL
- ☐ INSPECTION / CODE ENFORCEMENT APPEAL

PROJECT TYPE:

- ☐ ONE OR TWO FAMILY RESIDENTIAL
- ☐ MULTI-FAMILY RESIDENTIAL
- ☐ COMMERCIAL/INDUSTRIAL

PERMIT APPLICATION:		
ADDRESS:		ZIP:
TRACT:	BLK:	LOT:
OWNER NAME:	OWNER ADDRESS:	ZIP:

APPLICATION INFORMATION:

NAME:	ADDRESS:	ZIP:
EMAIL:	APPLICANT SIGNATURE:	DATE:

ISSUES:	VIOLATION:	CODE SECTION:
1.		
2.		
3.		

- ❖ FOR ADDITIONAL ISSUES, ATTACH TO THIS APPLICATION
- ❖ ATTACH ALL APPLICABLE EXHIBITS AND EVIDENCE TO THIS APPLICATION

SUPPLEMENTAL APPLICATION FOR APPEALS

ISSUES:	VIOLATION:	CODE SECTION:
4.		
5.		
6.		
7.		
8.		
9.		

Brandt-Hawley Law Group
P.O. Box 1659
Glen Ellen, California 95442
707.938.3900
susanbh@preservationlawyers.com
www.preservationlawyers.com

July 8, 2025

Osama Younan, General Manager
Superintendent of Building
Los Angeles Department of Building and Safety

Jacob Stevens, President
and Members of the Board of Building and Safety
Attn: Veronica Lopez, Board Secretary
201 North Figueroa Street, Suite 1030
Los Angeles, CA 90012.

Subject: **Justification for Appeal of Letter of Determination**
Project: Demolition of the Barry Building
Historic-Cultural Monument # 887

CASE NO.: CHC-2007-1585-HCM
RELATED CASE NO: ENV-2019-6645-EIR
CEQA: SCH#2020110210 (EIR)
Location: 11973-11975 W. San Vicente Boulevard
Council District: 11 – Park Community Plan Area: Brentwood – Pacific Palisades

Dear Manager Younan, President Stevens, and Boardmembers:

I represent Angelenos for Historic Preservation, a non-profit unincorporated association whose members enjoy and appreciate historic resources in Los Angeles, in its appeal of the proposed demolition of the historic Barry Building.

The Los Angeles Department of Building and Safety abused its discretion and failed to proceed in the manner required by law in approving the demolition of the Barry Building at 11973 – 11975 W. San Vincente Boulevard in Los Angeles. On June 6, 2025, Permit and Engineering Chief Binh Phan issued a Letter of Determination approving unsupported findings that the EIR Statement of Overriding Considerations justifies the demolition of the historic Barry Building and that a demolition permit may issue based on specific economic, social, or other considerations that make preservation infeasible.

Angelenos for Historic Preservation appeal the Department's approval based on violations of CEQA and Los Angeles Code section 106.4.5 by which the City implements CEQA. This appeal is timely filed within 35 days of June 6 and should be granted by the Department or by the Board of Building and Safety Commissioners.

Because I have not appeared before this Board, by way of brief introduction my statewide law practice has focused on the California Environmental Quality Act (CEQA) for over 40 years, particularly involving matters involving historic resources, in academic, legislative, administrative, and judicial forums. Some of my published CEQA cases include *Sierra Club v. County of Fresno, Friends of the San Mateo College Gardens v. San Mateo Community College District, Sierra Club v. San Joaquin LAFCO, Berkeley Hillside Preservation v. City of Berkeley,* and *Friends of Sierra Madre v. City of Sierra Madre,* all in the California Supreme Court, and *League for Protection v. City of Oakland, Stanislaus Natural Heritage Project v. County of Stanislaus, The Pocket Protectors v. City of Sacramento, Protect Niles v. City of Fremont, Sierra Club v. County of Sonoma, Save the Capitol, Save the Trees v. California Department of General Services, Citizens for the Restoration of L Street v. City of Fresno, Lincoln Place Tenants Association v. City of LA, Preservation Action Council San Jose v. City of San Jose,* and *Flanders Foundation v. City of Carmel,* in the Court of Appeal.

The City's Appeal Procedures are Unclear. Appellant is following the City's appeal procedures as directed in writing by Ms. Veronica Lopez, Secretary to the LA Board of Building and Safety. Correct procedures remain unclear as the appeal encompasses both the LABC and CEQA. However, upon inquiry, Ms. Lopez has directed that

as the LABC section being appealed is 106.4.5, the "Request for Modification of Building Ordinance" is the correct form for appeal. She stated via email that an appellant "must first complete page 1 of this form and provide supporting documents. The Department will then make the determination to grant, grant with conditions or deny the appeal." She further stated that one "may appeal the Department determination to the Board of Building and Safety Commission. If you choose to, LADBS staff will charge Board fees on page 2 of this form and ask that you complete the 'Supplemental Application for Appeals' form and provide an appeal brief." (Lopez email, June 30, 2025.) This direction is followed for this appeal under LABC 106.4.5 and CEQA. [1]

The Project: As explained to the Cultural Heritage Commission by Lambert Giessinger, Senior Architect, LA City Planning, Office of Historic Resources (OHR), applicant "11973 San Vicente LLC" proposes to demolish the 1951 Barry Building designed by LA architect Milton Caughey for David Barry, Jr., with ground-floor retail and four wings of offices around a central courtyard and lush tropical landscaping.

The applicant's goal is to create an empty lot, conceding that as no replacement project is pending, demolition has significant impact.

Mr. Giessinger explained: "Yes, good morning, Commissioners.

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[1] Further, in *Citizens for the Restoration of L Street v. City of Fresno* (2014) 229 Cal.App.4th 340. 347, as here, the City of Fresno allowed a non-elected commission to approve a CEQA document, and filed an NOD. In its City Council appeal, the group pointed out that the municipal code did not authorize the commission to conduct CEQA review. The court agreed and the Court of Appeal affirmed; it was not a bar that an NOD had been filed:

> … CEQA allows a local lead agency, such as the City, to delegate the authority to approve a [CEQA document] and a project to a nonelected decisionmaking body … In this case, however, the Fresno Municipal Code did not actually authorize the [commission] to (1) complete the environmental review required by CEQA and (2) approve the [CEQA document]. As a result, the [commission's] approval … did not comply with CEQA.

Appellant similarly claims that the Department lacks CEQA authority.

Lambert Giessinger, for the record. The item before you is related to the proposed demolition of the Barry Building, historic cultural monument number 887, located at 11973 to 11975 San Vicente Boulevard in Brentwood. The Planning Department has prepared an Environmental Impact Report as required for the proposed demolition. And the Department of Building and Safety is charged with its certification since **there is no replacement project**. The Department … sent a letter to the Commission … requesting the Commission's recommendation on the certification of the EIR, and whether or not there are potentially overriding considerations to justify the demolition of a historic cultural monument.

(Cultural Heritage Commission, 5 September 2024, Agenda Item 4, (*https://planning.lacity.gov/plndoc/Audio/CHC/2024/09-05-2024/4_CHC_2007_1585.mp3*) attached, p. 2.)



First housing Brentwood Books in 1960 and subsequently Dutton's Brentwood Books starting in 1984, the building's ground floor

storefront and courtyard served the Brentwood community as a bookstore and café for nearly 50 years until 2008. The building has been vacant and fenced off since 2017.

The building's international style modern architectural design is reflected in its flat roof, with wide overhanging eaves, smooth stucco cladding, floor to ceiling grid and louver windows on the interior courtyard, and horizontal band of windows originally screened with louvered wood grills on the primary south facing façade. The grills were removed without approvals in 2016.

The second story floats above the first floor storefronts and opening to the courtyard. The courtyard is landscaped with raised flagstone and concrete planters containing a variety of palm trees, as well as four steel framed benches with wood slat seating and backing.



Two curved staircases, one in the northeast corner and one in the southwest corner, provide access to the cantilevered second story

exterior walkway that encircles the courtyard. Each staircase consists of a floating concrete treads in steel pans, supported on triangular concrete mono stringers. Steel pipes support both the stairs and second floor walkway railings, with exposed detailing such as exposed metal plates and bolts serving as decorative elements. Louvered and gridded wood screen shelter portions of the east and west balconies. A passage at the northeast corner of the courtyard connects to a rear parking lot.

The City Council designated the Barry Building as historic cultural monument number 887 in 2007, finding that it was significant under two of the cultural heritage ordinance criteria. Firstly, that it reflects the broad cultural, economic, or social history of the nation, state, or community, as the long time home of Dutton's Brentwood Bookstore, a symbol of the Los Angeles literary scene, that contributed to the growth and development of the San Vicente Commercial Corridor in Brentwood.

And secondly, that it embodies the distinguishing characteristics of an architectural type specimen inherently valuable for a study of a period style of method of construction, as a distinguished example of international style architecture.

There was a previous attempt to demolish the Barry Building in 2009. The current property owner filed an application for the redevelopment of the site containing the subject property into a new commercial center.

At this time the Commission reviewed the Environmental Impact Report for that project. It expressed concerns over the proposed demolition of the Barry Building. *In a formal letter addressed to the*

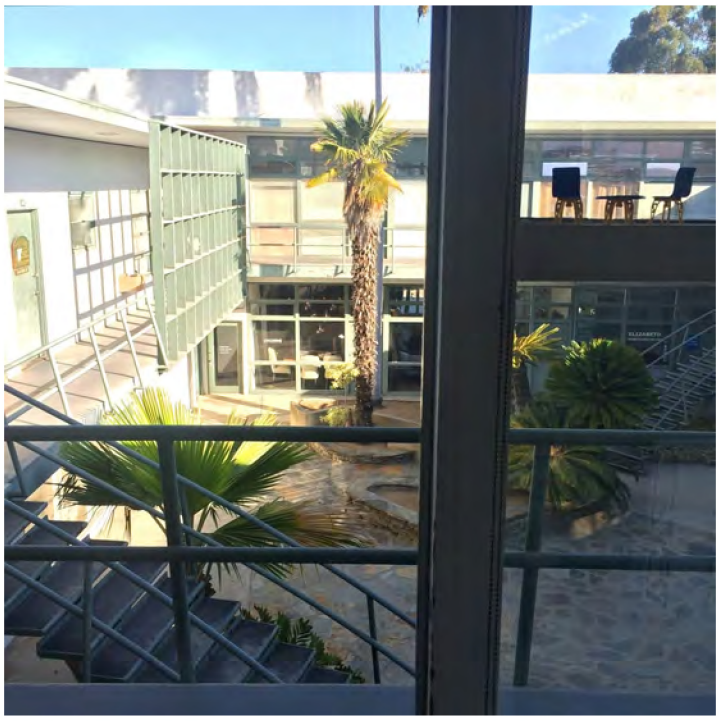
City Planning Commission, the Commission opposed the demolition of the Barry Building and supported a preservation alternative that retained and integrated the building into a proposed project.

The Commission stated, quote, that *any concerted effort to purposely demolish an 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 *the Barry Building can be integrated into new development, while also meeting and exceeding the 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.* The Commission reiterated that, quote, we strongly support sensitive reuse of historic resources.

The applicant withdrew the application for the proposed Green Hollow Square development project in October 2013."
(Transcript, attached, pp.3-7, italics added.)

The City's Letter of Determination explains further:

"Once demolition activities are complete, the portion of the Project Site that currently contains the Barry Building would be a vacant lot, and the existing surface parking lot would remain. A landscape buffer would be installed along the southern boundary of the Project Site (fronting San Vicente Boulevard). No future development of the Project Site is proposed or considered as part of the Project."
(Letter of Determination, attached, EIR Findings, p. 1.)



Administrative Process. Consideration of EIR adequacy and whether the findings of overriding considerations proposed by the EIR and Department staff are supported by substantial evidence were considered by the Cultural Heritage Commission — *which determined that they were not*. The Commissioners were assisted in review by the City's historic resources experts: Mr. Giessinger, Melissa Jones of OHR staff, and Mindy Nguyen of Planning's major projects section.

Following substantial discussion, including concern about demolition by neglect as well as public policy concerns about the detrimental aesthetics of a vacant lot, the Commission unanimously recommended the Department ***not*** adopt the unsupported statement of overriding considerations. (Transcript, pp. 59-66.)

The Commission recommendations are supported by substantial evidence; the Department findings and project approvals challenged in this appeal are not.

CEQA's Substantive Mandate. CEQA declares that it is the policy of the state that "public agencies should not approve projects as proposed if there are feasible alternatives … that would substantially

lessen their significant environmental effects." (Pub. Resources Code, § 21002.) Section 21002 explains that CEQA's environmental processes are practical: they are "intended to assist public agencies" in evaluating impacts and identifying alternatives. (*Id.* at § 21002.1(a).)

This has become known as CEQA's "substantive mandate." It is further implemented in section 21081, which prohibits an agency from approving a project with significant environmental impacts unless it first (1) adopts feasible mitigation measures and alternatives and then, (2) if significant impacts still remain, adopts a finding of overriding public benefit. (§ 21081.) The findings must be made in order and must be fact-based. As explained below, the demolition should be voided as a result of this appeal because:

- The EIR is inadequate and should not be certified, and
- The statement of overriding considerations is not supported by substantial evidence.

The following actions should be set aside:

a. The Mitigation Monitoring and Reporting Program (MMRP)

b. The EIR Findings dated 04/18/2025, attached;

c. The Statement of Overriding Considerations (Letter of Determination; pp 36-39 of the EIR Findings.)

d. A finding that based upon the whole of the record, including the EIR Findings and the Statement of Overriding Consideration in Exhibit 'A,' a demolition permit may be issued because specific economic, social, or other considerations make infeasible the preservation of the building at 11973 W. San Vicente Boulevard.

LAMC Code section 106.4.5. Implementing CEQA, the Code requires that demolition of a specific historic resource would result in a significant adverse impact, the Department cannot issue a demolition permit without first finding that "specific economic, social, or other considerations" make preservation of the resource "infeasible."

Project Segmentation. Despite denial by the project applicant, as explained above City staff has confirmed that the Barry Building is currently surrounded by cleared lots that are owned by the same legal entity applicant, which previously — unsuccessfully — applied to develop a multi-lot project. (Transcript, pp. 5-7.)

All phases of a project must be considered in an EIR as the "whole of the action," so that "environmental considerations do not become submerged by chopping a large project into many little ones, each with a potential impact on the environment, which cumulatively may have disastrous consequences." (*Bozung v. Local Agency Formation Commission of Ventura County* (1975) 13 Cal.3d 263, 283–284; *Burbank-Glendale-Pasadena Airport Authority v. Hensler* (1991) 233 Cal.App.3d 577.)

Citizens Association for Sensible Development of Bishop Area v. County of Inyo (1985) 172 Cal.App.3d 151, 167 held that "division of the shopping center project into two parts constituted an abuse of discretion, " per Guidelines section 15126: "[a]ll phases of a project must be considered when evaluating its impact on the environment …."

An EIR project description must include future activities that are reasonably foreseeable. (*Laurel Heights Improvement Association v. Regents of the University of California* (1988) 47 Cal.3d 376, 399.)

Here, it is reasonably foreseeable that the applicant who now owns the Barry Building property *and* adjacent lots that have been cleared in recent years, intends either to develop them or sell them to an entity who will. The EIR is inadequate for its failure to analyze the potential for development as part of the project description or to identify potentially feasible mitigation and alternatives that adaptively reuse the Barry Building to reduce significant impacts.

Lack of Evidence to Support Overriding Considerations. Absent emergency, demolition of a historic resource is not a stand-alone project. Demolition generally makes way for something else, especially in a valuable real estate market like Los Angeles. So it is here.

Demolition of a historic structure segmented from any prospective, undefined new project provides no foundation or context to consider the feasibility of mitigation measures and alternatives. Archival documentation does not reduce impacts to insignificance: "drawing a chalk mark around a dead body is not mitigation." (*Architectural Heritage Association v. County of Monterey* (2004) 122 Cal.App.4th 1095, 1019, overruled on another ground in *Friends of the Willow Glen Trestle v. City of San Jose* (2016) 2 Cal.App.5th 457, 460.)

The City's lack of evidence to support overriding considerations was addressed point by cogent point by City OHR Planner Melissa Jones before the Cultural Heritage Commission. As recited in the transcript upon which appellant relies:

"The Department of Building and Safety requested the [Cultural Heritage] Commission to advise on whether Building and Safety should adopt a Statement of Overriding Considerations. *Staff recommends that the benefits of the project as drafted by the property owner are not supported with substantial evidence, and none of the considerations individually outweigh the significant environmental impacts of the demolition of the Barry Building*. Therefore, staff's recommendation is that the Department of Building and Safety not adopt the Statement of Overriding Considerations." (Transcript, pp. 12-20.)

Appellant requests that the recommendations of OHR staff and the Cultural Heritage Commission be followed.

There is no substantial evidence supporting contrary findings.

Thank you for your consideration of this appeal.

Sincerely,



Susan Brandt-Hawley

FORM GEN. 160 (REV. 6-80)

CITY OF LOS ANGELES
DEPARTMENT OF BUILDING AND SAFETY

LETTER OF DETERMINATION

DATE: 06/06/2025

TO: 11973 San Vicente, LLC
C/o Alston & Bird
Attn: Ed Casey
333 Hope Street, 16th Floor
Los Angeles, CA 90071

FROM: Binh Phan, Chief
Permit and Engineering Bureau

SUBJECT: Demolition of the Building Located at 11973 San Vicente Boulevard (Historic-Cultural Monument No. LA-887)

PROJECT DESCRIPTION:

The proposed 11973 W. San Vicente Boulevard Project (Project or Proposed Project) consists of the demolition of an existing two-story commercial building, commonly referred to as the Barry Building, a designated Historic-Cultural Monument.

Pursuant to Los Angeles Municipal Code (LAMC) Section 91.106.4.5, the Department of Building and Safety (LADBS) shall not issue a permit to demolish a building designated as a Historic-Cultural Monument (HCM) without LADBS first determining whether the demolition "may result in the loss of or serious damage to a significant historical or cultural asset." If LADBS determines that such loss or damage may occur, a CEQA clearance is required to be prepared, and if the HCM is considered significant, no demolition permit may be issued without LADBS first "finding that specific economic, social, or other considerations make infeasible the preservation of the building or structure."

To comply with Section 91.106.4.5, the Department of City Planning (DCP) prepared and processed an environmental impact report (EIR), EIR findings, and a statement of overriding considerations for LADBS' consideration for the Proposed Project.

DETERMINATION:

In accordance with the California Environmental Quality Act (CEQA) and related City procedures, the following determinations and actions are taken by LADBS after its review and consideration of the whole of the record, including the EIR, communications by DCP, all submissions by the Applicant's representatives, the recommendation of the Cultural Heritage Commission, and any and all communications on the Project to DCP or LADBS:

1. **Environmental Impact Report Determination**

   Pursuant to CEQA Guidelines Section 15132, it is determined that the Final Environmental Impact Report (FEIR), which includes the Draft EIR (SCH No. 2020110210, ENV-2019-6645-EIR) dated February 2023, the Draft EIR appendices, and the document titled "Final EIR" dated September 2023 (including all related appendices and attachments), complies with CEQA requirements.

2. **Certification of the FEIR**

   The Los Angeles Department of Building and Safety (LADBS) certifies that:

   a. The FEIR has been completed in full compliance with CEQA;
   b. The FEIR was presented to the LADBS and the LADBS has reviewed and considered the information contained in the FEIR prior to approval of the Project, and all of the information contained therein has substantially influenced all aspects of the decision by the LADBS; and
   c. The FEIR reflects the independent judgment and analysis of the LADBS.

3. **Adopts the following:**

   a. The Mitigation Monitoring Program (MMP);
   b. The EIR Findings dated 04/18/2025 (attached at Exhibit 'A');
   c. The Statement of Overriding Considerations, found on pages 36-39 of the EIR Findings (Exhibit "A"). The LADBS further finds that each identified benefit of the Proposed Project, as listed in the Statement of Overriding Considerations, independently justifies approval of the Project and overrides all identified significant and unavoidable impacts of the Proposed Project; and
   d. A finding that based upon the whole of the record, including the EIR Findings and the Statement of Overriding Consideration in Exhibit 'A,' a demolition permit may be issued because specific economic, social, or other considerations make infeasible the preservation of the building at 11973 W. San Vicente Boulevard.

4. **Custodian of Records**

   LADBS records related to this project are available through the LADBS Records Section at the following locations:

   Metro Office
   201 N. Figueroa Street, 1st Floor, Room 110
   Los Angeles, CA 90012

   Van Nuys Office
   6262 Van Nuys Boulevard, 2nd Floor, Room 251
   Van Nuys, CA 91401

All other records of proceedings shall be maintained by the Department of City Planning. The Director of Planning shall serve as the custodian of these records, which are kept at:

Department of City Planning
221 North Figueroa Street, Suite 1350
Los Angeles, CA 90012

5. Notice of Determination

Staff from the Department of City Planning is directed to file a Notice of Determination with the County Clerk in accordance with the Public Resources Code and CEQA Guidelines within five (5) days of mailing of this letter.

NOTICE RE APPEALS:

Appeal to Board of Building & Safety Commissioners

This determination may be appealed pursuant to LAMC Section 98.0403.1(b)(2) by any interested party within thirty-five (35) days of mailing of this letter. To file an appeal, please follow the instructions in Exhibit 'B' and email the applicable completed form to Board of Building and Safety Secretary Veronica Lopez veronica.lopez@lacity.org, (213) 482-7429 or file it in person at 201 North Figueroa Street, Suite 1030 Los Angeles, CA 90012.

CEQA Appeal

This determination and any determination upon an appeal described in Exhibit 'B' is an "approval" and a final decision for purposes of CEQA. If the determination is upheld on an appeal to the Board of Building and Safety Commissioners (Board), the Board's determination is appealable to the City Council pursuant to LAMC Section 13B.11.1.F. If this determination is not appealed, the determination is final for purposes of CEQA and no further CEQA appeal is available, including upon issuance of the demolition permit after referral to the Cultural Heritage Committee, as described below.

Referral to CHC

To the extent this decision becomes final, either because no appeal is filed or it is ultimately upheld on appeal, before issuance of the demolition permit on the Project, the demolition permit will be referred to the Cultural Heritage Commission (CHC) pursuant to Los Angeles Administrative Code (LAAC) Sections 22.171.14 and 22.171.15. Under these Sections, the CHC and the City Council have authority to suspend issuance of a demolition permit to hold public hearings addressing preservation of a monument, but CHC and the City do not have the authority to condition or deny a demolition permit for any purpose, including to mitigate or avoid environmental impacts. As such, any action under LAAC Sections 22.171.14 or 22.171.15 is not appealable for purposes of CEQA or otherwise.

Please feel free to contact me for further details or clarifications.

Attachments: Exhibit 'A' EIR Findings
Exhibit 'B' DBS Information Bulletin re Appeals

cc: Vincent P. Bertoni, AICP, Director of Planning
Milena Zasadzien, Principal City Planner
Mindy Nguyen, Senior City Planner

"Exhibit A"

06/06/2025

EIR Findings

I. Introduction.

The Environmental Impact Report (EIR), consisting of the Draft EIR and the Final EIR, is intended to serve as an informational document for public agency decision-makers and the general public regarding the objectives and environmental impacts of 11973 San Vicente Boulevard Project (Project), located at 11973-11975 San Vicente Boulevard (Assessor Parcel No. 4404-025-008), on the north side of San Vicente Boulevard between Montana Avenue and Saltair Avenue (Site or Project Site). The Project consists of demolition of the existing two-story commercial building, commonly referred to as the Barry Building, located on the Project Site. The existing building is a City of Los Angeles Historic-Cultural Monument (HCM) that has been vacant and fenced since 2017. The proposed Project consists of the demolition of the Barry Building. Once demolition activities are complete, the portion of the Project Site that currently contains the Barry Building would be a vacant lot, and the existing surface parking lot would remain. A landscape buffer would be installed along the southern boundary of the Project Site (fronting San Vicente Boulevard). No future development of the Project Site is proposed or considered as part of the Project.

The City of Los Angeles (City), as Lead Agency, has evaluated the environmental impacts of implementation of the Project by preparing an environmental impact report (EIR) (Case Number ENV-2019-6645-EIR/State Clearinghouse No. 2020110210). The EIR was prepared in compliance with the California Environmental Quality Act of 1970 (CEQA), Public Resources Code (PRC) Section 21000 et seq. and the California Code of Regulations Title 15, Chapter 6 (CEQA Guidelines). The findings discussed in this document are made relative to the conclusions of the EIR.

PRC Section 21002 provides that "public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects[.]" The procedures required by CEQA "are intended to assist public agencies in systematically identifying both the significant effects of proposed projects and the feasible alternatives or feasible mitigation measures which will avoid or substantially lessen such significant effects." PRC Section 21002 goes on to state that "in the event [that] specific economic, social, or other conditions make infeasible such project alternatives or such mitigation measures, individual projects may be approved in spite of one or more significant effects thereof."

The mandate and principles announced in PRC Section 21002 are implemented, in part, through the requirement that agencies must adopt findings before approving projects for which EIRs are required. (See PRC Section 21081[a]; CEQA Guidelines Section 15091[a].) For each significant environmental impact identified in an EIR for a proposed project, the approving agency must issue a written finding, based on substantial evidence in light of the whole record, reaching one or more of the three possible findings, as follows:

1) Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the significant impacts as identified in the EIR.

2) Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been, or can or should be, adopted by that other agency.

3) Specific economic, legal, social, technological, other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the EIR.

The findings reported in the following pages incorporate the facts and discussions of the environmental impacts that are found to be significant in the Final Environmental Impact Report for the project as fully set forth therein. Although Section 15091 of the CEQA Guidelines does not require findings to address environmental impacts that an EIR identifies as merely "potentially significant", these findings nevertheless fully account for all such effects identified in the Final EIR for the purpose of better understanding the full environmental scope of the Project. For each environmental issue analyzed in the EIR, the following information is provided:

The findings provided below include the following:

- Description of Significant Effects - A description of the environmental effects identified in the EIR.
- Project Design Features - A list of the project design features or actions that are included as part of the Project.
- Mitigation Measures - A list of the mitigation measures that are required as part of the Project to reduce identified significant impacts.
- Finding - One or more of the three possible findings set forth above for each of the significant impacts.
- Rationale for Finding - A summary of the rationale for the finding(s).
- Reference - A reference of the specific section of the EIR which includes the evidence and discussion of the identified impact.

With respect to a project for which significant impacts are not avoided or substantially lessened either through the adoption of feasible mitigation measures or feasible environmentally superior alternatives, a public agency, after adopting proper findings based on substantial evidence, may nevertheless approve the project if the agency first adopts a statement of overriding considerations setting forth the specific reasons why the agency found that the project's benefits rendered acceptable its unavoidable adverse environmental effects. (CEQA Guidelines Sections 15093, 15043[b]; see also PRC Section 21081[b].)

II. Environmental Review Process.

For purposes of CEQA and these Findings, the Record of Proceedings for the Project includes (but is not limited to) the following documents:

Initial Study. The Project was reviewed by the City of Los Angeles Department of City Planning (Lead Agency) in accordance with the requirements of the CEQA (PRC 21000 et seq.). The City prepared an Initial Study in accordance with Section 15063(a) of the State CEQA Guidelines in November 2020. The Initial Study is included as Appendix A-1 of the Draft EIR.

Notice of Preparation. Pursuant to the provisions of Section 15082 of the State CEQA Guidelines, the City then circulated a Notice of Preparation (NOP) to State, regional and local agencies, and members of the public for a 33-day period commencing on November 18, 2020,

and ending on December 12, 2020. The purpose of the NOP was to formally inform the public that the City was preparing a Draft EIR for the Project, and to solicit input regarding the scope and content of the environmental information to be included in the Draft EIR. Written comment letters responding to the NOP were submitted to the City by from four agencies and organizations (Department of Transportation, Department of Fish and Wildlife, Native American Heritage Commission, and South Coast Air Quality Management District) and from individuals. The NOP and NOP comment letters are included in Appendix A-2 and A-3 of the Draft EIR.

Draft EIR. The Draft EIR evaluated in detail the potential effects of the Project. It also analyzed the effects of a reasonable range of alternatives to the Project, including a "No Project" alternative. The Draft EIR for the Project (State Clearinghouse No. 2020110210), incorporated herein by reference in full, was prepared pursuant to CEQA and State, Agency, and City CEQA Guidelines (City of Los Angeles California Environmental Quality Act Guidelines). The Draft EIR was circulated for a 46-day public comment period beginning on February 16, 2023, and ending on April 3, 2023. That comment period was extended by the Lead Agency for 15 days to and through April 18, 2023. A Notice of Availability (NOA) was distributed on February 16, 2023, to all property owners within 500 feet of the Project Site and interested parties, which informed them of where they could view the document and how to comment. The Draft EIR was available to the public at the City of Los Angeles, Department of City Planning, and the following local libraries: Los Angeles Central Library, West Los Angeles Regional Library, and the Donald Bruce Kaufman Branch Library. A copy of the document was also posted online at https://planning.lacity.org. Notices were filed with the County Clerk on February 16, 2023.

Notice of Completion. A Notice of Completion was sent with the Draft EIR to the Governor's Office of Planning and Research State Clearinghouse for distribution to State Agencies on February 15, 2023, and notice was provided in newspapers of general and/or regional circulation.

Final EIR. The City released a Final EIR for the Project on September 11, 2023, which is hereby incorporated by reference in full. The Final EIR constitutes the second part of the EIR for the Project and is intended to be a companion to the Draft EIR. The Final EIR also incorporates the Draft EIR by reference. Pursuant to Section 15088 of the CEQA Guidelines, the City, as Lead Agency, reviewed all comments received during the review period for the Draft EIR and responded to each comment in Section II, Responses to Comments, of the Final EIR. On September 7, 2023, responses were sent to all public agencies that made comments on the Draft EIR at least 10 days prior to certification of the EIR pursuant to CEQA Guidelines Section 15088(b). Notices regarding availability of the Final EIR were also sent to property owners and occupants within a 500-foot radius of the Project Site, as well as anyone who commented on the Draft EIR, and interested parties.

Cultural Heritage Commission. On September 5, 2024, the Cultural Heritage Commission (CHC) considered the matter of certification of the EIR by LADBS and instructed staff to communicate their recommendation to LADBS action on certification of the EIR and adoption of the Statement of Overriding Considerations.

III. Record of Proceedings.

For purposes of CEQA and these Findings, the Record of Proceedings for the Project includes (but is not limited to) the following documents and other materials that constitute the administrative record upon which the City approved the Project. The following information is incorporated by reference and made part of the record supporting these Findings of Fact:

- All Project plans and application materials including supportive technical reports;
- The Draft EIR and Appendices, and Final EIR and Appendices, and all documents relied upon or incorporated therein by reference;
- The Mitigation Monitoring Program (MMP) prepared for the Project;
- The City of Los Angeles General Plan and related EIR;
- The Southern California Association of Governments (SCAG)'s 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) and related EIR (SCH No. 2019011061);
- Municipal Code of the City of Los Angeles;
- All records of decision, resolutions, staff reports, memoranda, maps, exhibits, letters, minutes of meetings, summaries, and other documents approved, reviewed, relied upon, or prepared by any City commissions, boards, officials, consultants, or staff relating to the Project;
- Any documents expressly cited in these Findings of Fact, in addition to those cited above; and
- Any and all other materials required for the record of proceedings by PRC Section 21167.6(e).

Pursuant to PRC Section 21081.6(a)(2) and CEQA Guidelines Section 15091(e), the documents and other materials that constitute the record of proceedings upon which the City has based its decision are located in and may be obtained from the Department of City Planning, as the custodian of such documents and other materials that constitute the record of proceedings, located at the City of Los Angeles, Figueroa Plaza, 221 North Figueroa Street, Room 1350, Los Angeles, CA 90012.

In addition, copies of the Draft EIR and Final EIR are available on the Department of City Planning's website at https://planning.lacity.org/development-services/eir (to locate the documents, search for either the environmental case number or project title in the Search Box). The Draft and Final EIR are also available at the following three Library Branches:

- Los Angeles Central Library—630 West Fifth Street, Los Angeles, CA 90071
- West Los Angeles Regional Library—11360 Santa Monica Blvd., Los Angeles, CA 90025
- Donald Bruce Kaufman Branch Library—11820 San Vicente Blvd., Los Angeles, CA 90049

IV. Project Description.

The Project consists of the demolition of the Barry Building, a two-story commercial building on a 0.61-acre site (APN 4404-025-008) located at 11973-11975 San Vicente Boulevard.

In 2007, the City of Los Angeles Cultural Heritage Commission designated the building as HCM No. 887. The building has been vacant and fenced off since 2017, and is boarded up with screwed-on plywood panels to prevent vandalism, loitering, and other public safety hazards associated with the current vacancy of the Barry Building.

The building is subject to the City's Soft Story Retrofit Program (LAMC Section 91.9300 et seq., Ordinance 183,893 entitled Mandatory Earthquake Hazard Reduction in Existing Wood Frame Buildings with Soft, Weak or Open Front Walls ["Soft Story Ordinance"]). The Ordinance applies to buildings with a "soft story," or building (or portion thereof) with no ascertainable lateral system. (See *11971 San Vicente Boulevard – Retrofit Schemes (Soft Story Memorandum),* Englekirk Structural Engineers (Rev. June 3, 2022) included as Appendix H-3 to the Draft EIR). The Soft Story Ordinance requires the owner of each building within the Ordinance's scope to undertake a structural analysis of the building. If the building does not meet the minimum earthquake standards specified, "the owner shall cause the building to be structurally altered to conform to such standards or, at the owner's option, cause it to be demolished within the time limits stated." (LAMC Section 91.9305.1.) In March 2018, the City of Los Angeles issued the Project Applicant an Order to Comply with the City's Soft Story Retrofit Program. Specifically, the Order to Comply requires the Project Applicant to comply with the following requirements as set forth in LAMC Section 91.9305.2

The building must be renovated or demolished in accordance with the Soft Story Ordinance or face penalties. A seismic assessment of the building was prepared. (See *11973 San Vicente Boulevard ASCE 41-13 Seismic Assessment,* Englekirk Structural Engineers (June 6, 2022), included as Appendix G to the Draft EIR.) The retained structural engineers identified that only a portion of the building has a "soft story" and is required to comply with the Ordinance. (See *11971 San Vicente Boulevard – Retrofit Schemes (Soft Story Memorandum),* Englekirk Structural Engineers (Rev. June 3, 2022) included as Appendix H-3 to the Draft EIR. See also *11971 San Vicente Boulevard – Retrofit Schemes (Soft Story Retrofit Letter Report)*, Englekirk Structural Engineers (June 1, 2021) included as Attachment H-2 to the Draft EIR.) The seismic assessment determined that there are high levels of overstress in the other portions of the building, and that the building is likely to suffer significant damage when subject to a moderate to strong earthquake in the Los Angeles basin, which presents a safety hazard to people in and around the building. The seismic engineers determined that additional renovations would be required to make the building suitable for occupancy above those required by the Soft Story Ordinance.

Englekirk Structural Engineers also determined that the seismic instability of the Barry Building is due to its 1950's building design, rather than lack of maintenance or neglect on behalf of the owner. Buildings designed and constructed in the early 1950's had low seismic demands and requirements; however, current requirements are much higher. Englekirk also noted, as in its prior report, in addition to the seismic retrofit work required under the Soft Story Ordinance for the south wing of the building, the north, east, and west wings of the building are currently up to 650% overstressed and would also require renovation. While the California Historical Building Code allows historic buildings to meet only 75% of the current building code forces, due to the very high level of overstress in the building substantial work, including strengthening the existing shear walls and floor/roof plywood diaphragm, and adding shear walls and moment frames would still be required. Temporary wooden frames are not a valid retrofit option because it would not meet current requirements under either the Uniform Building Code or the Historical Building Code. (See *Barry Building (11973 San Vicente Boulevard, Los Angeles, CA 90049) Los Angeles Conservancy Comments Review*, Englekirk Structural Engineers, (May 25, 2023), included as Attachment I to the Final EIR.)

Per LAMC Section 91.9305.1, which provides that it is "the owner's option" to demolish the building, the Project Applicant has proposed to demolish the existing building in order to comply with the Soft Story Ordinance.

Once demolition activities are complete, the portion of the Project Site that currently contains the Barry Building would be a vacant lot, and the portion of the existing surface parking lot that is on the Project Site would remain. Demolition would take place within the Project Site, while the adjacent parcel to the north (APN 4404-025-016, which is not part of the Project Site) would be used for staging. No demolition work is proposed within the public right-of-way. Demolition of the building would result in the removal of approximately 4,174 cubic yards of debris from the Project Site, including approximately 130 cubic yards of asbestos-containing materials and 4,044 cubic yards of demolition materials.

In accordance with the San Vicente Scenic Corridor Specific Plan, a landscape buffer would be installed along the southern boundary of the Project Site (fronting San Vicente Boulevard). As part of the Project, three on-site palm trees would be removed (a Chinese windmill palm, a king palm, and a queen palm); however, the fourth on-site palm (Mexican fan palm) in the surface parking lot and two street trees (both London plane trees) located along San Vicente Boulevard would remain.

The Project is anticipated to last approximately 36 working days, with one additional day to plant the landscape buffer.

No future development of the Project Site is proposed and/or considered as part of the Project. No additional permits, approvals, or entitlements are requested. To this end, the Project Applicant has provided a statement, signed and notarized, that certifies that the permit for demolition is not sought to facilitate construction or development of a larger project. (See Attachment to Application for Demolition Permit: Owner's Declaration Related to CEQA and Project Scope, included as Attachment B-2 to the Final EIR.)

V. No Impact or Less than Significant Impact without Mitigation

The impacts of the Project that were determined to have no impact or be less than significant in the EIR (including having a less than significant impact as a result of implementation of project design features and compliance with existing regulations) and that require no mitigation are identified below. The City has reviewed the record and agrees with the conclusion that the following environmental impacts would not be significantly affected by the Project and therefore, no additional findings are needed. The following information does not repeat the full discussions of environmental impacts contained in the EIR. The City ratifies, adopts, and incorporates the analysis, explanation, findings, responses to comments, and conclusions of the EIR.

Summary of Impacts Evaluated in the Initial Study Only

The Initial Study (Appendix A-1 of the Draft EIR) considered effects with respect to the following: aesthetics, agricultural and forestry resources, air quality (odors), biological resources, cultural resources (archeological resources and human remains), energy, geology and soils, hazards and hazardous materials, hydrology and water quality, land use and planning (physically divide an established community), mineral resources, noise (airport noise), population and housing, public services, recreation, transportation/traffic (plan consistency, VMT, and design feature hazards), utilities and service systems, and wildfire, but found that the Project would either have no impact or a less than significant impact with respect to each of these topics. No mitigation was required, and no further analysis of these topics was needed in the Draft EIR. (See Initial Study attached as Appendix A-1 to the Draft EIR, and Draft EIR Section VI.6.)

Aesthetics: The Project would not have a substantial adverse on a scenic vista, scenic resources, public views, or create a new source of light or glare. While the Project Site is located within the boundaries of the San Vicente Scenic Corridor Specific Plan, the plan area is not considered a scenic vista, and the Specific Plan establishes streetscape and urban design criteria only to protect the pedestrian-scale and community-oriented commercial nature along San Vicente Boulevard. Since no future development of the Project Site is proposed or considered as part of the Project, the Project would not increase building height on the Project Site or alter panoramic views that include the Project Site or interfere with current views. In addition, the Project would not conflict with applicable regulations governing scenic quality. The aesthetic impact was therefore determined to be less than significant. (Appendix A-1 to the Draft EIR, page 24. See also Draft EIR, page VI-9.)

Agricultural and Forestry Resources: The Project Site is currently developed with a commercial building, does not contain any agricultural uses. The Project Site is currently zoned C4-1VL, for commercial uses, and is not zoned for agricultural use, forest land or timberland. The Initial Study determined that the Project would have no impact on agricultural or forestry resources, as it would not convert any farmland, does not conflict with any agricultural zoning, would not result in forest loss, nor would it create changes to the existing environment which could result in the loss of agricultural or forested land. (See Appendix A-1 to the Draft EIR, page 31.).

Air Quality (odors): The Project consists solely of the demolition of the existing commercial building, and no future development of the Site is proposed and/or considered as part of the Project. Therefore, the Project would not include any of the uses identified by the SCAQMD *CEQA Air Quality Handbook* as being associated with substantial odors. Further, any odors that may be generated during demolition would be localized and temporary in nature, and would not have the potential to affect a substantial number of people or result in a nuisance as defined by SCAQMD Rule 402. (See Appendix A-1 to the Draft EIR, page 36.)

Biological Resources: Due to the developed nature of the Project Site and lack of any natural open spaces, there are no candidate, sensitive, or special status species identified that would be impacted by the Project.[1] Furthermore, there are no riparian areas, sensitive natural communities, or Significant Ecological Areas as defined by the City of Los Angeles located on or adjacent to the Project Site. Demolition of the existing building would not interfere substantially with any established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites. (See Appendix A-1 to the Draft EIR, page 37.)

Cultural Resources (archeological resources and human remains): The Project Site is located in an urbanized area of the City and has been disturbed by past development activities.

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[1] Cycads have been identified by a commentator as existing in the courtyard of the Barry Building. However, cycads are not native to California and are not protected by California native plant protection laws, the California Endangered Species Act (CESA), or addressed by the Appendix G questions in CEQA (thresholds of significance) which specifically refer to native plants. (See Email from Jacqueline Bowland Worden, Lead Biologist/Natural Resources Project Manager, SWCA Environmental Consultants (May 26, 2023) included as Attachment K-2 to the Final EIR and *The Barry Building – 11973 San Vicente Boulevard, Los Angeles, California 90049*, Carlberg Associates (May 19, 2023) included as Attachment K-1 to the Final EIR.)

There are no known archaeological resources at the Project Site, nor are there any known traditional burial sites or other type of cemetery usage has been identified with the Project Site and immediate vicinity. As such, Project impacts would be less than significant to archeological cultural resources and human remains, and no further analysis of this topic in the EIR was required. (See Appendix A-1 to the Draft EIR, page 41.) Additional analysis of Cultural Resources (historic resources) was provided in the Draft EIR. (See Section IV.B of the Draft EIR.)

Energy: The proposed demolition activities would consume relatively minor quantities of electricity. No future development of the Site is proposed and/or considered as part of the Project; therefore, the Project would not have an operational demand for energy, with the exception of a limited amount of electricity for sprinklers to water the landscape buffer. Thus, the Project would not result in an increase in demand for electricity, natural gas, or petroleum that exceeds available supply or distribution infrastructure capabilities. (See Appendix A-1 to the Draft EIR, page 44.)

Geology and Soils: Impacts related to geology and soils are all less than significant. The Project Site is not located within a known earthquake fault, nor is it within a liquefaction zone. As the Project involves the demolition of an existing seismically unsafe building, the Project would not expose people or structures to substantial adverse effects associated with geology or soils. (See Appendix A-1 to the Draft EIR, page 52.)

Hazards and Hazardous Materials: Based on the age of the existing building, it is assumed that it contains asbestos containing materials (ACMs). In accordance with existing rules and regulations, all materials which are identified as ACMs, would be removed by a trained and licensed asbestos abatement contractor. The Project will not create any significant impacts related to hazards or hazardous materials. (See full analysis in Appendix A-1 to the Draft EIR, page 60.)

Hydrology and Water Quality: Based on the limited timeframe for demolition (seven weeks), the small size of the Project Site, the additional pervious area on the Site after demolition, and the lack of an operational component to the Project, the Project would not be expected to substantially degrade surface or ground water quality or conflict with any water quality standards or plans. Impacts on hydrology and water quality would be less than significant. (See Appendix A-1 to the Draft EIR, page 65.)

Land Use and Planning (physically divide an established community): The Project does not contain features such as highways or new infrastructure that would cause a permanent disruption in the physical arrangement of the surrounding uses. Therefore, no impact would occur. Additional Land Use and Planning impacts are discussed below. (See Appendix A-1 to the Draft EIR, page 70.)

Mineral Resources: The Project would not result in the loss of a known mineral resource; Project Site is not located within a City-designated oil field or oil drilling area, nor is the Project Site is located within a City-designated Mineral Resource Zone where significant mineral deposits are known to be present. Demolition of the Barry Building will have no impact on mineral resources. (See Appendix A-1 to the Draft EIR, page 71.)

Noise (Operational Noise and Vibration, Airport noise): The Project would not include an operational phase, and therefore would not result in impacts related to operational noise or operational vibration. The Project Site is not located within an airport land use plan or within two miles of a public airport or public use airport. There are no private airstrips in the vicinity of the Project Site. Therefore, no impact would occur. Additional noise impacts are discussed below. (See Appendix A-1 to the Draft EIR, page 73.)

Population and Housing: The Project-related demolition activities would not represent a permanent or substantial new employment generator that would result in substantial unplanned population growth either directly or indirectly. The Project would not displace any housing or residents, as there is no housing on the Project Site. Therefore, no impact would occur. (See Appendix A-1 to the Draft EIR, page 75.)

Public Services: The Project would not result in substantial adverse physical impacts associated with the need or provision of new or physically altered governmental facilities. Demolition activities associated with the Project may temporarily increase demand for fire protection (emergency medical services) and police protection, however, demolition activities would be required to comply with all applicable federal, State, and City safety regulations and impacts would be less than significant. As there is no operational component to the Project, there is no impact to schools, parks, or other public facilities. (See Appendix A-1 to the Draft EIR, page 77.)

Recreation: No future development of the Site is proposed and/or considered as part of the Project. Thus, he Project would have no impact on recreation. (See Appendix A-1 to the Draft EIR, page 84.)

Transportation (plan consistency, VMT, and design feature hazards): The demolition of the Barry Building would not conflict with any program plan or policy regarding the circulation system, nor would it conflict with CEQA Guidelines Section 15064.3, subdivision (b) (regarding VMT), or increase hazards due to a geometric design feature. Thus, there would be no impact to these areas. (See Appendix A-1 to the Draft EIR, page 86.)

Utilities and Service Systems: Demolition and construction activities typically do not involve the consumption of natural gas, the need for telecommunications infrastructure, or result in the generation of wastewater that would need to be treated by wastewater treatment infrastructure that serves the Project Site. There is sufficient landfill capacity to accommodate the solid waste generated by the demolition of the existing building, and impacts would be less than significant. (See Appendix A-1 to the Draft EIR, page 92.)

Wildfire: The Project Site is not located in or near a state responsibility area, within a City-designated Very High Fire Hazard Severity Zone, or within a City-designated buffer zone. Therefore, no impact regarding this topic would occur. (See Appendix A-1 to the Draft EIR, page 97.)

Cumulative Impacts: With regards to cumulative effects with respect to aesthetics, agricultural resources, biological resources, energy, geology and soils, hazards and hazardous materials, hydrology and water quality, mineral resources, population and housing, public services, recreation, utilities and service systems, and wildfire as identified in the Initial Study, the Project's

incremental contribution to potential cumulative impacts would not be cumulatively considerable as the Project would either have no impact or a less than significant impact with respect to these topics, and therefore could not combine with other projects to result in cumulative impacts. (See Appendix A-1 to the Draft EIR, page 100.)

Summary of Impacts Evaluated in the EIR

The Draft EIR concluded that the following applicable impacts would be less than significant without additional mitigation: Air Quality, Noise (groundborne vibration) Greenhouse Gas Emissions, Transportation/Traffic (emergency access) and Tribal Cultural Resources. (See Draft EIR Section I at I-7 and Section VI.6.) The EIR also considered potential cumulative impacts for each impact. The related projects list consists of seven projects provided by the City of Los Angeles Department of Transportation (LADOT) detailed in Section III of the Draft EIR. (See Table III-1, page III-3.)

Air Quality: The Project includes the demolition of the existing building, but no future development of the Project Site is proposed and/or considered as part of the Project. The demolition would be short term and as a result would not exceed any applicable air quality thresholds. Ss discussed in Section IV.A of the Draft EIR, the Project would not conflict with or obstruct implementation of the applicable air quality plan, exceed any applicable significance threshold or regulatory standard, or expose any sensitive receptors to substantial pollutant concentrations. Finally, the Project would not result in any significant cumulative air quality impacts and thus would not require any mitigation. (See full analysis in Section IV.A of the Draft EIR.) No significant cumulative impacts to air quality were identified, and no mitigation measures are required. (See Draft EIR, Section IV.A-37.)

Greenhouse Gas Emissions: The EIR compared the Project's characteristics with applicable regulations, plans, and policies to reduce greenhouse gas (GHG) emissions and found that the project would not conflict with plan, policy, or regulation adopted for the purpose of reducing GHG emissions. Thus, as noted in Section IV.C of the Draft EIR, impacts are less than significant, and no mitigation is required. (See Section IV.C of the Draft EIR.) In addition, no significant cumulative impacts to GHG emissions were identified, and no mitigation measures are required. (See Draft EIR Section IV.C-39.)

Land Use and Planning (conflict with plan or policy): With regard to the San Vicente Scenic Corridor Specific Plan, the issuance of a Demolition Permit will not change the land use or zoning designations of the Project Site. A vacant lot is not on the list of uses prohibited within the Specific Plan (Specific Plan, Section 5: Uses). A discussion of the Project's consistency with the applicable provisions of the San Vicente Scenic Corridor Specific Plan is provided in Table 4.I-3 of the Initial Study (Appendix A-1 to the Draft EIR) and a discussion of the Project's consistency with the applicable design guidelines contained in the San Vicente Scenic Corridor Specific Plan is provided in Table 4.I-4 of the Initial Study (Appendix A-1 to the Draft EIR. See also IV.D of the Draft EIR.). The Project would not conflict with any of those applicable policies and guidelines, and thus no impacts would occur. Cumulative impacts related to land use and planning would be less than significant without mitigation.

Noise (groundborne construction vibration): The Project's estimated construction vibration impacts at nearby receptors sensitive to the human annoyance effects of ground-borne vibration would not exceed the applicable 72 VdB threshold of significance. As a result, the Project's human

annoyance-related vibration impacts as generated by on-site construction activities would be less than significant. Off-site vibration was also analyzed by the EIR and was found to be less than significant, and no mitigation is required. (See Section IV.E of the Draft EIR.) Cumulative on-site and off-site construction vibration impacts related to human annoyance would be less than significant. (See Draft EIR Section IV.E-35.)

Transportation/Traffic (emergency access): Project construction activities would not generate a significant number of daily trips during peak hours or increase congestion in the Project vicinity that could affect emergency access. The Project's impacts to transportation / traffic are less than significant. (Section IV.F of the Draft EIR). In addition, the Project includes a Project Design Feature (PDF-TRA-1 Demolition Management Plan) requiring the Project Applicant to prepare a detailed Demolition Management Plan. (See Section IV.F of the Draft EIR, page IV.F-12.) The Project's cumulative impacts related to emergency access would be less than significant. (See Draft EIR Section IV.F-17.)

Tribal Cultural Resources: No specific tribal cultural resources were identified at the Project Site by either a sacred lands file search, a California Historical Resources Information System records searches, or in consultation with California Native American Tribes. The Project Site was determined to have a low sensitivity for containing unknown tribal cultural resources, and the Project would only disturb soils that have been previously disturbed by past development activities. Therefore, Project's impacts with respect to tribal cultural resources would be less than significant without mitigation, as noted in Section IV.G of the Draft EIR. cumulative impacts to tribal cultural resources would be less than significant and would not be cumulatively considerable. (See Draft EIR Section IV.G-12.)

VI. Less than Significant Impacts with Mitigation

The EIR determined that the Project has potentially significant environmental impacts in the areas discussed below. The EIR identified feasible mitigation measures to avoid or substantially reduce the environmental impacts in these areas to a level of less than significant. Based on the information and analysis set forth in the EIR, the Project would not have any significant environmental impacts in these areas, as long as all identified feasible mitigation measures are incorporated into the Project. The City again ratifies, adopts, and incorporates the full analysis, explanation, findings, responses to comments, and conclusions of the EIR.

Noise (temporary or permanent increase in noise)

Impact Summary

The Project Site is occupied by an approximately 13,956 square foot commercial building that is vacant and boarded up, and is therefore assumed to generate no noise. Construction would generate noise during the approximately 36 working days of demolition activities (see Table II-1 in Section II of the Draft EIR, Project Description, for the proposed Project schedule), with one additional day to install the landscape buffer.

The Draft EIR evaluated the noise expected as a result of the Project through on-site construction, off-site construction, and vibration-producing activities (discussed previously). Analysis of the activities and equipment planned to be used at the Project Site evaluated the unmitigated noise impacts that could result from excavator and loader usage during the Project's proposed demolition of the Barry Building. Noise increases at 640 Saltair Avenue, 11900 Saltair Terrace,

and 529 Westgate. Avenue could exceed the City's 5 dBA Leq increase significance criteria. As a result, without mitigation, this impact would be considered significant.

With respect to LAMC Section 112.05, no individual piece of equipment (i.e., no individual excavator or loader or backhoe) is estimated to generate a noise level in excess of 75 dBA L_{eq} as measured at a distance of 50 feet. As a result, the Project's impact as it pertains to the generation of noise levels in excess of noise ordinance standards would be considered less than significant.

The Project would also generate noise at off-site locations from haul trucks removing debris from the Project Site during demolition activities. Haul trucks would access the Project Site via San Vicente Boulevard. According to FHWA TNM 2.5 modeling, the Project's off-site noise impacts from construction-related traffic truck traffic would be less than significant.

The Project, together with related projects and future growth, was evaluated for potential cumulative noise impacts. A total of seven related projects were identified in the study area. (See Table III-1 for list of related projects.) The closest related project is more than 1,000 feet from the Project Site; it would not combine with the Project to result in a cumulative construction noise impact. The Draft EIR determined that cumulative noise due to construction truck traffic from the Project and related projects would not have the potential to exceed the ambient noise levels along the haul route or other streets by 5 dBA. Thus, Project impacts would not be cumulatively considerable and cumulative construction noise impacts would be less than significant.

Project Design Features

No specific project design features (PDFs) are proposed with regard to noise.

Mitigation Measures

To ensure that the Project's construction-related noise increases at 640 Saltair Avenue, 11900 Saltair Terrace, and 529 Westgate Avenue do not exceed the City's 5 dBA L_{eq} threshold of significance, the following mitigation measure is required:

MM-NOI-1 Sound barriers rated to achieve a sound attenuation of at least 15 dBA shall be erected along the following boundaries:

- The east and west parking area boundaries (both the Project Site's east and west parking area boundaries and the east and west boundaries of the parcel immediately to the north of the Project Site (APN 4404-025-016)). (While the parcel to the north of the Project Site is not part of the Project, that parcel would be used for construction staging.)
- The northern property line of the parcel to the north of the Project Site (APN 4404-012-016) that separates this parcel from the residential uses to the north. Sound barriers along this property line shall be connected to the previously described sound barriers for the east and west property lines, so that there are no gaps.

All sound barriers shall be tall enough to shield line of sight paths from operating demolition equipment to the 2nd stories of nearby residential uses. The prescribed sound barriers shall be installed for the duration of the Project's demolition activities, which are estimated to last approximately 36 working days. At plan check, building plans shall include documentation prepared by a noise consultant to verify compliance with this measure.

Finding

Changes or alterations have been required in, or incorporated into, the project which mitigate or avoid the significant effects on the environment (PRC Section 21081(a)(1))

Rationale for Finding

Implementation of Mitigation Measure MM-NOI-1 would reduce demolition-related noise impacts to below the City's 5 dBA L_{eq} significance criteria. As shown in Draft EIR Section IV.E, Table IV.E-7, building demolition-related noise increases at 640 Saltair Avenue, 11900 Saltair Terrace, and 529 Westgate Avenue would be no greater than 1.1 dBA after implementation of Mitigation Measure MM-NOI-1. Therefore, the Project's noise impact from on-site demolition activities would be considered less than significant with mitigation.

Reference

See Draft EIR Section IV.E and Appendix D of the Draft EIR for complete analysis of the noise impacts, thresholds, and evaluation methods conducted for the Project.

VII. Significant and Unavoidable Impacts

The Final EIR determined that the environmental impacts set forth below are significant and unavoidable. In order to approve the project with significant unmitigated impacts, the City is required to adopt a Statement of Overriding Considerations, which is set forth in Section XII, below. No additional environmental impacts other than those identified below will have a significant effect or result in a substantial or potentially substantial adverse effect on the environment as a result of the construction or operation of the project. The City finds and determines that:

a) All significant environmental impacts that can be feasibly avoided have been eliminated, or substantially lessened through implementation of the project design features and/or mitigation measures; and

b) Based on the Final EIR, the Statement of Overriding Considerations set forth below, and other documents and information in the record with respect to the construction and operation of the project, all remaining unavoidable significant impacts, as set forth in these findings, are overridden by the benefits of the project as described in the Statement of Overriding Considerations for the construction and operation of the project and implementing actions.

Cultural Resources (historic resources)

Impact Summary

The Barry Building was constructed in 1951 by David Barry, Jr., who hired architect Milton Caughey[2] to design the two-story commercial office building with shops on the ground floor, wrapping a central courtyard lushly landscaped with tropical plants. In 1993, a one-story receiving and storage addition was constructed on the north side of the building. An additional alteration in that area in 1993 was removal of the screens separating the rear patios from the parking lot. A

[2] Caughey's work consisted primarily of residences and schools; the Barry Building is one of his few commercial projects.

ramp was added on the southeast side to enter the courtyard space. The landscaped courtyard has also been altered over time.

The Project Site is currently developed with the two-story Barry Building and a surface parking lot. It is set back from San Vicente Boulevard by a narrow concrete-paved plaza with low planters. The building is flanked to the east by a shared driveway and to the north by the surface parking lot. The building consists of four wings of offices around a central garden courtyard, forming an open square in plan. The building has flat roofs at varying heights, with parapets around the perimeter and cantilevered plaster soffits with wood fascia around the courtyard. Two curved staircases, one in the northeast corner and one in the southwest corner, provide access to the cantilevered second-story balconies that encircle the courtyard. Each staircase consists of "floating" concrete treads in steel pans supported on triangular concrete mono stringers, with metal pipe railings.

The second story of the south wing is supported on slender steel pipe columns, leaving the ground floor open to both San Vicente Boulevard and the central courtyard. A small freestanding structure, slightly rotated from the building's orthogonal plan relative to San Vicente Boulevard, is located under the southeast corner. The interiors of the office suites are finished with wood flooring, plaster walls, and textured acoustical plaster ceilings.

The Barry Building was designated by the City as a Historic-Cultural Monument (HCM) No. 887 in 2007. The property is significant under the City's Cultural Heritage Ordinance Criterion 1, because it reflects "the broad cultural, political, economic or social history of the nation, state, or community." The building was the longtime home of Dutton's Brentwood Books and fostered a sense of cultural identity along the San Vicente commercial corridor in Brentwood. The Barry Building is also significant under City's Cultural Heritage Ordinance Criterion 3, because it "embodies the distinguishing characters of an architectural-type specimen, inherently valuable for a study of a period, style of method of construction," as an example of International Style architecture. The Barry Building is an example of Mid-century Modern commercial architecture in Los Angeles and embodies a distinctly local expression of the style. The period of significance for the context/theme/property type combination is 1945-1975. The Barry Building retains integrity of location, design, setting, materials, workmanship, and feeling. It is therefore eligible for listing in the National Register and the California Register. Details of the criteria, eligibility standards, character-defining features, and integrity considerations are provided in the Historical Resources Technical Report included as Appendix C-1 of the Draft EIR.

The Project would demolish the Barry Building and all those physical characteristics that convey its historical significance and that justify its designation as a City HCM, and its eligibility for listing in the California Register and the National Register. Thus, the Project would materially impair the significance of the Barry Building and would cause a substantial adverse change in the significance of an historical resource as defined by CEQA. Therefore, Project impacts related to historical resources would be significant and unavoidable.

As discussed in Section IV.B of the Draft EIR, cumulative impacts to historical resources would be less than significant. While the Project would demolish the Barry Building, resulting in a Project-specific significant and unavoidable impact, the Barry Building is not a contributor to any established historic district or HPOZ and does not contribute to the significance of any other individual historical resources.

Project Design Features

No specific project design features (PDFs) are proposed with regard to cultural resources.

Mitigation Measures

The following measure has been required for the Project:

MM-CUL-1 Prior to the issuance of a demolition permit, the Barry Building shall be documented to meet Historic American Buildings Survey (HABS) Level I standards. The documentation shall include a full set of measured drawings depicting existing conditions; photographs with large format negatives of exterior and interior views; photocopies with large format negatives of select existing drawings and historic views that are produced in accordance with the U.S. Copyright Act (as amended); and a written history and description. The documentation shall be submitted to the Library of Congress, with copies given to the Los Angeles Conservancy and the Los Angeles Public Library. A digital copy of the documentation shall be submitted to the South Central Coastal Information Center at California State University, Fullerton.

Finding

Specific economic, legal, social, technological, other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the EIR. (PRC Section 21081(a)(3))

Rationale for Finding

As discussed in Section II (Project Description) of the Draft EIR, the Project consists of the demolition of the Barry Building, which has been vacant and fenced off since 2017, and the installation of a landscape buffer along the southern boundary of the Project Site. The existing building is currently designated as a City of Los Angeles HCM. Adopting Mitigation Measure MM-CUL-1, which will document the existing building's historical significance, will not eliminate the Project's significant impacts to cultural resources, which are the result of demolition of an HCM. Therefore, as discussed in Draft EIR Section IV.B, the Project's impacts to cultural resources will be significant and unavoidable. Mitigation Measure MM-CUL-1, provided above, requires the Barry Building to be documented to meet HABS Level I standards prior to demolition. However, even after implementation of Mitigation Measure MM-CUL-1, Project impacts would remain significant and unavoidable as the Project would demolish the existing historical resource. Further, all feasible mitigation measures have been imposed on the Project, mitigation measures such as interpretive programs, incorporation of materials into a new building, or a commemorative plaque would not reduce impacts, provide additional benefits not otherwise provided by the HABS survey detailed above, or are impractical because no new development is proposed. Therefore, as the Project is demolition of a building with no new construction, all feasible mitigation measures have been imposed on the Project. Further, Alternatives 1, 2, and 3 of the Draft EIR studied alternatives to demolition that could potentially mitigate effects but were determined infeasible. In addition, relocation of the building is technically impractical and infeasible due to the size of the building and the logistical requirements to move the structure. Dismantling the building for relocation would pose a significant risk to the buildings character-defining features.

Reference

See Section IV.B and Section VI of the Draft EIR for complete analysis of the cultural resources impacts, thresholds, and evaluation methods conducted for the Project.

Land Use and Planning (conflict with plan or policy)

Impact Summary

The Project Site has a General Plan land use designation of Neighborhood Office Commercial and is zoned C4-1VL (Commercial Zone, Height District 1VL). The Commercial Zone permits a range of commercial uses including retail and office uses. Within Height District 1VL, the C4 zone allows for a building height maximum of up to 45 feet and establishes a floor area ratio (FAR) of 1.5:1.

As the Project would result in the demolition of an existing historical resource, the Project would conflict with the applicable objectives and policies in the City of Los Angeles General Plan - Conservation Element related to the preservation of historical resources. Therefore, the Project would result in a potentially significant impact with respect to consistency with the City of Los Angeles General Plan (Conservation Element).

The Project would also conflict with several of the applicable goals, objectives, and policies within the Brentwood – Pacific Palisades Community Plan that are related to the preservation of historical resources. See Section IV.D, Table IV.D-1 of the Draft EIR. Therefore, the Project would result in a potentially significant impact with respect to consistency with the Brentwood-Pacific Palisades Community Plan.

The Project would not result in any changes to the General Plan land use designation and zoning regulations applicable to the Project Site. However, the Project would conflict with the goals, objectives, and policies of the General Plan (Conservation Element) and the Brentwood-Pacific Palisades Community Plan related to historic preservation, which are the primary goals, objectives, and policies applicable to the Project since development of the Project Site is not proposed.

As described in Draft EIR Section IV.B, Cultural Resources, Mitigation Measure MM-CUL-1 would be undertaken by the Project Applicant, which requires the Barry Building to be fully documented prior to demolition.

Even with implementation of Mitigation Measure MM-CUL-1, the Project would conflict with the applicable land use goals, objectives, and policies as the Project would demolish the existing historical resource. Therefore, Project impacts related to land use and planning would remain significant and unavoidable.

Project Design Features

No specific project design features (PDFs) are proposed with regard to land use and planning.

Mitigation Measures

The Project would be required to implement MM-CUL-1, discussed above, which would mitigate impacts to cultural resources, and by extension applicable goals, objectives, and policies related to historic preservation.

Finding

Specific economic, legal, social, technological, other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the EIR. (PRC Section 21081(a)(3))

Rationale for Finding

As evaluated in Section IV.D of the Draft EIR, the Project would conflict with the applicable policies of the General Plan (Conservation Element) and the Brentwood-Pacific Palisades Community Plan related to historic preservation. Even with implementation of Mitigation Measure MM-CUL-1, the Project would continue to conflict with the applicable land use goals, objectives, and policies as the Project would demolish the existing historical resource. Therefore, Project impacts related to land use and planning would remain significant and unavoidable. However, there were no other mitigation measures identified in the EIR that avoid that significant impact. Further, Alternatives 1, 2, and 3 of the Draft EIR studied alternatives to demolition that could potentially mitigate effects but were determined infeasible. In addition, relocation of the building is technically impractical and infeasible due to the size of the building and the logistical requirements to move the structure. Dismantling the building for relocation would pose a significant risk to the buildings character-defining features.

Therefore, there are no feasible mitigation measures or alternatives that would reduce impacts to related to land use to less than significant.

Reference

See Draft EIR Sections IV.D and Section VI for complete analysis of the land use and planning impacts, thresholds, and evaluation methods conducted for the Project.

VIII. Alternatives

CEQA requires that an EIR analyze a reasonable range of feasible alternatives that could substantially reduce or avoid the significant impacts of a project while also meeting the project's basic objectives. An EIR must identify ways to substantially reduce or avoid the significant effects that a project may have on the environment (PRC Section 21002.1). Accordingly, the discussion of alternatives shall focus on alternatives to a project or its location which are capable of avoiding or substantially reducing any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly. The alternative analysis included in the Draft EIR, therefore, identified a reasonable range of project alternatives focused on avoiding or substantially reducing the project's significant impacts.

Summary of Findings

Based upon the following analysis, the City finds, pursuant to CEQA Guidelines Section 15091, that no feasible alternative or mitigation measure will substantially lessen any significant effect of the project, reduce the significant unavoidable impacts of the project to a level that is less than significant, or avoid any significant effect the project would have on the environment.

Project Objectives

The objectives of the Project are as follows:

1. Comply with the City's Soft Story Retrofit Program (LAMC Section 91.9300 et seq., Ordinance entitled Mandatory Earthquake Hazard Reduction in Existing Wood Frame Buildings with Soft, Weak or Open Front Walls), which includes complying with the requirements under LAMC Section 91.9305.2.

2. Abate the fire, loitering, vandalism, and other public safety hazards associated with structural defects and current vacancy of the Barry Building.

Alternatives Analyzed

Alternative 1 – No Project Alternative

Description of Alternative

CEQA requires the alternatives analysis to include a "no project" alternative, which is the circumstance under which the Project does not proceed. The purpose of analyzing a No Project Alternative is to allow decision makers to compare the impacts of approving the project with the impacts of not approving the project (CEQA Guidelines Section 15126.6, subd. (e)(1)).

This alternative assumes that the Project would not be implemented, and the existing building would not be demolished. However, in March 2018, the City of Los Angeles issued the Applicant an Order to Comply with the City's Soft Story Retrofit Program. (See LAMC Section 91.9305.2(1)(c), (2), and (3).) Thus, even under a "no project" alternative, some alternations to the Barry Building must be made. In a "no project" alternative where the building is not demolished, then it must be retrofitted to avoid penalties under the Soft Story Ordinance. However, Alternative 1 assumes only the minimum seismic retrofit work would be undertaken to comply with the Soft Story Ordinance, but no other seismic retrofit work would be undertaken and therefore the building would not be operational under this alternative.

Englekirk Structural Engineers prepared a technical report dated May 26, 2021 (included in Appendix H-2 of the Draft EIR) that included a structural analysis to repair the existing building to conform to the City's Soft Story Ordinance (see "Phase I" discussion in Appendix H-2). According to the Englekirk report, the south wing of the building that faces San Vicente Boulevard utilizes a pass-through at the ground floor that accesses the interior courtyard. As a result, there are no bearing walls that extend to the foundation and instead the second floor is supported on a series of isolated steel columns.

To comply with the City's Soft Story Retrofit Program, Englekirk developed a seismic retrofit scheme that consists of steel moment frame structures that are located within the building and are supported on new concrete footings. However, compliance with the retrofit required by the Soft Story Ordinance would not address structural deficiencies identified in the east, north, or west wing as provided in Englekirk's Seismic Assessment (see Appendix H-3 and Appendix G of the Draft EIR).

Therefore, if the remaining building wings are not structurally retrofitted, the work to the south wing of the building would not be sufficient to protect building occupants if the building was subject to a moderate to severe seismic event. In addition, the south wing alone, which is on the second story of the building, could not be occupied as occupants would need to take one of two stairways and travel along other wings of the building that have not been retrofitted in order to reach the south wing. As such, the building could not be safely occupied under Alternative 1. This alternative would not address the building's other areas of noncompliance, specifically under the ADA and the Building Code.

Impact Summary

All of Alternative 1's impacts would be less than significant, including with respect to historical resources and land use. The Project would result in a significant and unavoidable impact with respect to historical resources and land use, as the Project would demolish the existing building, which is City HCM No. 887. As Alternative 1 involves the retention of the existing building, Alternative 1 would result in similar impacts as the Project related to Air Quality, Greenhouse Gas

Emissions, Noise, Transportation, Tribal Cultural Resources, and would avoid the Project's significant and unavoidable impacts with respect to Cultural Resources (historical resources) and Land Use and Planning (conflict with plans).

Finding

Specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the environmental impact report. (PRC 21081(a)(3).)

Rationale for Finding

As discussed above, Alternative 1 involves the retention of the existing building, with minor seismic retrofitting, resulting in a structure that would be unsuitable for full occupation. Alternative 1 would avoid the significant impacts related to historical resources and land use. However, as discussed in Englekirk Structural Engineers technical report dated May 26, 2021, with the seismic retrofitting to comply with the requirements of the City's Soft Story Retrofit Program, the building would still present a seismic risk and safety hazard and could not be occupied. This is because the structural retrofit required by the Soft Story Ordinance only addresses the structural deficiencies in the south wing, and does not address the east, north, or west wing structural deficiencies. Further, the building would not meet ADA requirements for accessibility, further limiting its suitability for occupation. As discussed above, the alternative is not feasible because, even with compliance with the Soft Story Retrofit requirements, structural issues would remain, precluding occupation of much of the building and a reasonable return on investment, while persisting as a safety hazard. The structural condition of the building, combined with lack of ADA compliance would present both economic and legal complications for the owner, as failure to comply with ADA regulations could result in legal and economic penalties were the building to be occupied. Feasibility is defined by PRC Section 15364 as "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors." As discussed above, specific economic, legal, technical, and social limitations make the alternative infeasible.

Per the CEQA Guidelines Section 15126.6 (a), reasonable project alternatives are those that "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, and evaluate the comparative merits of the alternatives." Accordingly, while this alternative would partially meet the first Project objective, this Alternative is still infeasible because it would not resolve the public safety consideration associated with a moderate to severe earthquake event. In such an event, there would still be a significant risk to public safety because of the structural deficiencies in the building wings not subject to the Soft Story Ordinance. Further, given that the building would remain unoccupied under this alternative, the property would remain vacant and therefore, would not meet the second Project objective. Therefore, this alternative would not meet most of the project objectives.

Therefore, per PRC Section 15364 and based on the above specific economic, legal, social and technical reasons Alternative 1 would be infeasible.

Reference

See Draft EIR Section V for complete analysis of alternatives evaluated for the Project.

Alternative 2 – Preservation Alternative

Description of Alternative

Alternative 2, the Preservation Alternative would involve the work required to comply with the City's Soft Story Ordinance (as with Alternative 1), in addition to a voluntary seismic retrofit on the remainder of the building, and renovations to ensure compliance with the ADA, building code, and energy efficiency upgrades of the existing building.

The voluntary seismic retrofit program proposed by Englekirk Structural Engineers (see "Phase II" discussion in the technical report contained in Appendix H-2 of the Draft EIR) would include strengthening existing walls, adding new two-story shear walls, adding new floor and roof diaphragm sheathing, and adding new steel moment frames.

In addition, various physical aspects of the building are not in compliance with the ADA and California Building Code provisions related to access to buildings and properties for people with disabilities (Title 24, Part 2, Vol. 2, Chapter 11B). These issues are detailed in the ADA Upgrade Report prepared by Gruen Associates, included in Appendix H-5 of the Draft EIR. Accordingly, in addition to the voluntary seismic retrofit described above, Alternative 2 would also include an ADA upgrade, which would include upgrades related to an accessible path of travel, plumbing, stairs and balcony railing, vertical transportation, and tenant space improvements. Finally, certain aspects of the building do not meet California Building Code requirements. Therefore, Alternative 2 includes the following work to bring the building into compliance with the Code and other energy efficiency requirements.

Upon completion of the voluntary seismic retrofit, and ADA, building code, and energy efficiency upgrades, the building could be re-occupied by approximately 12,800 square feet of retail uses.

In the analysis provided below, asbestos abatement activities, which would take place prior to all other work, are anticipated to last two weeks. Performing the additional preservation measures is estimated to take approximately six months. Finishing activities, such as paving and applying new architectural coatings to the Barry Building, would take approximately one week each.

Impact Summary

As Alternative 2 involves the preservation of the existing building, Alternative 2 would avoid the Project's significant and unavoidable impacts with respect to historical resources and land use. However, as Alternative 2 includes an operational component (the re-occupancy of the building), Alternative 2 would result in greater impacts than the Project with respect to air quality, greenhouse gas emissions, noise, and traffic, although these impacts would still be less than significant.

While the additional construction would not result in exceedances of significance thresholds because there is no demolition activity under this Alternative, to further minimize Alternative 2's construction-related noise increases at 11900 Saltair Terrace and other sensitive receptors, the Draft EIR identified the following mitigation measure:

ALT2 MM-1 Sound barriers rated to achieve a sound attenuation of at least 15 dBA shall be erected along the following boundaries:

- The east and west parking area boundaries (both the Project Site's east and west parking area boundaries and the east and west boundaries of the parcel immediately to the north of the Project Site (APN 4404-025-016)). (While the parcel to the north of the Project Site is not part of either the Project or Alternative 2, that parcel would be used for construction staging.)

- The northern property line of the parcel to the north of the Project Site (APN 4404-025-016) that separates this parcel from the residential uses to the north. Sound barriers along this property line shall be connected to the sound barriers described for the east and west property lines, so that all of Alternative 2's construction areas are fully enclosed by sound barriers.

The sound barriers shall be tall enough to shield line of sight paths from operating construction equipment to the 2nd stories of nearby residential uses. The prescribed sound barriers shall be installed for the duration of Alternative 2's construction activities.

Finding

Specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the environmental impact report. (PRC 21081(a)(3))

Rationale for Finding

Alternative 2 would meet both of the Project objectives. However, studies provided by the Applicant demonstrate that Alternative 2 is economically infeasible.

This alternative would include compliance with the Soft Story Ordinance, additional seismic renovations, ADA upgrades and building code compliance to prepare the building for occupancy.

An economic analysis (hereafter "Initial Renovation Cost Analysis") was conducted and submitted to the record on April 20, 2023, by the Applicant. The analysis attached the following reports:

- *11971 San Vicente Boulevard – Retrofit Schemes* by Englekirk Structural Engineers (June 2021) (Soft Story Retrofit Letter Report) (Attachment A);
- *11971 San Vicente Boulevard – Retrofit Schemes* by Englekirk Structural Engineers (June 2022) (Attachment B);
- *11973 San Vicente Boulevard, ASCE 41-13 Seismic Assessment* by Englekirk Structural Engineers (June 2022) (Attachment C);
- *Prcject Impacts Assessment, 11973 San Vicente Boulevard* by Historic Resources Group (October 2022) (Attachment D);
- *Barry Building ADA Update Requirements* by Gruen Associates (June 2021) (Attachment E);
- *Barry Building Renovations* by Hill International (November 2022) (Attachment F); and
- *Barry Building Land Residual Analysis* by CBRE, Inc. (March 2023) (Pro forma) (Attachment G)

In addition, updated economic analysis (hereafter "Additional Cost Analysis") was provided by the Applicant on July 15, 2024. Additional reports attached to this analysis included:

- *Revised Cost Estimate*, Hill International (June 27, 2024) (Attachment H to the Additional Cost Analysis); and
- *Revised Revenue Analysis*, CBRE, Inc. (July 2024) (Attachment I to the Additional Cost Analysis)

In November 2024, the Applicant provided additional economic analysis to the City (hereafter "Updated Cost Analysis"), including:

- *Barry Building Retrofit Scope Costs*, Hill International (October 3, 2024)
- *Barry Building Proposed Retrofit*, Englekirk Structural Engineers (September 9, 2004)
- *Barry Building – Opinion of Probable Retrofit Cost*, Hill International (November 6, 2024)
- *Appraisal Report*, CBRE, Inc. (November 8, 2024)

The Initial Renovation Cost Analysis is included in the Administrative Record. (See Letter from E. Casey to J. Harris, RE: *11973 San Vicente Boulevard Prcject / ENV-2019-6645-EIR / State Clearinghouse No. 2020110210* (April 20, 2023).) The Additional Cost Analysis was provided to the Office of Historic Resources, in a letter from E. Casey dated July 15, 2024. (See Letter from E. Casey to K. Bernstein, *RE: 11973 San Vicente Boulevard Prcject / ENV-2019-6645-EIR / State Clearinghouse No. 2020110210 ("Barry Building')* (July 15, 2024).) The Updated Cost Analysis was provided to the City on November 14, 2024. (See Letter from E. Casey to J. McCrea, *RE: 11973 San Vicente Boulevard Prcject / ENV-2019-6645-EIR / State Clearinghouse No. 2020110210* (November 14, 2024).) These analyses and related attachments are the entirety of the materials in the administrative record evaluating the economic feasibility of the Project Alternatives.

Collectively, the above-referenced reports found that a large number of modifications are required to renovate the Barry Building to meet minimum standards for safety and accessibility. In addition to the retrofits required under the Soft Story Ordinance, a seismic assessment (Attachment C to the Initial Renovation Cost Analysis and included as Appendix G to the Draft EIR) found that the building's the north, east, and west wings currently range from being 190-percent to 650-percent overstressed, and further recommended additional renovations to make the building seismically sound. In addition to seismic upgrades, the necessary upgrades for compliance with the ADA and building code were identified. (See Attachment E to the Initial Renovation Cost Analysis and included as Appendix H-5 to the Draft EIR).

Attachment F to the Initial Renovation Cost Analysis contains a Cost Report Regarding Barry Building Renovations, prepared by Hill International on November 2, 2022. Hill International estimated the cost of the each of the renovations identified to make the building suitable for occupancy, and estimated a total cost for the work. The cost of these renovations was approximately $12,818,000 as of November 2022.

In addition, a pro forma revenue analysis completed by CBRE in March 2023 analyzed the expected value of the land and rental income based on the real estate market and the costs to complete necessary renovations to determine the maximum revenue that would be generated from a rehabilitated Barry Building. (See Attachment G to the Initial Renovation Cost Analysis.)

CBRE evaluated Alternative 2 of the Draft EIR (the "Preservation Alternative"), including seismic retrofitting of the existing Barry Building, the ADA upgrades, and Building Code compliance renovations identified in the Hill International Report (discussed above). This alternative estimates a total of an approximate 12,800 square feet of retail uses (and includes some common areas like bathrooms). In addition to the $12,818,000 estimated cost to complete necessary renovations

(per Hill International, discussed above), leasing commissions, costs for improvements to the leased spaces ("Tenant Improvement Allowance"), transfer taxes and developer profit were considered. According to CBRE's analysis dated March 2023 (provided by the Applicant in April 2023) the total combined costs of Alternative 2 are estimated at $17,024,961.

CBRE determined that under the assumptions of Alternative 2, the annual gross rental income for the retrofitted Barry Building is estimated at approximately $736,960; the total value of the retrofitted Building is $11,361,308. (See Attachment G to the Initial Renovation Cost Analysis.)

Thus, CBRE concluded that to preserve the Barry Building per Alternative 2, the residual land value would be $11,361,308 minus $17,024,961, or negative $5,663,653. CBRE found that the proposed project alternative returns a negative valuation. That is, the total costs of the necessary renovations and preparing the Barry Building for lease are estimated to be greater than the value of the renovated property.

The Applicant provided additional analyses to the City in July 2024 which identified changes in the costs associated with Alternative 2. Hill International revised its analysis in June 2024 and determined that the cost to complete the rehabilitation work as of June 2024 had risen to approximately $17.1 million. (See Attachment H to the Additional Cost Analysis.) Hill International's revised analysis determined that from June 1, 2021, to June 26, 2024, the cost per square foot for this renovation work rose from $777 to $1,108. According to Hill International's analysis, this escalation is primarily driven by higher labor costs, increased material prices, and rising transportation and disposal fees.

CBRE's 2023 analysis previously provided by the Applicant was based on an income approach that could be derived from the Owner leasing space in the rehabilitated building. In July 2024, the Applicant also commissioned a 2024 Appraisal Report by CBRE based on a sales approach. This analysis was provided as Attachment I to the Additional Cost Analysis. CBRE 2024's report determined that the Barry Building Property, assuming rehabilitation of the existing building, has no market value and may even have a negative value of $5,672,747.

In addition to the economic analysis prepared by the Applicant evaluating Alternatives 2 and 3, the Applicant has also evaluated the economic feasibility of completing only the minimum rehabilitation required for compliance with the Soft Story Ordinance and the California Historic Building Code. In November 2024, the Applicant provided the following analyses to the City related to this proposed scenario as part of the Updated Cost Analysis:

- Barry Building Proposed Retrofit, Englekirk Structural Engineers (September 9, 2004)
- Barry Building Retrofit Scope Costs, Hill International (October 3, 2024)
- Barry Building – Opinion of Probable Retrofit Cost, Hill International (November 6, 2024)
- Appraisal Report, CBRE (November 8, 2024)

This scenario specifically accounts for the allowance per Section 8-706 of the California Historic Building Code for an historic building retrofit to meet only 75% of the current Building Code. The Applicant provided a Seismic Assessment prepared by Englekirk Structural Engineers identifying the work required under this more limited scope seismic retrofit work (the "75% Seismic Retrofit").

The required rehabilitation identified by Englekirk includes: reinforcing shear walls; adding plywood at floors and roof; adding or enlarging existing footings. (See Barry Building Proposed Retrofit, Englekirk Structural Engineers, September 9, 2004.)

The Applicant also provided an analysis of the costs associated with this narrowed scope of work under the 75% Seismic Retrofit scenario as compared to Alternative 2. An estimate prepared by Hill International excluded work previously considered within Alternative 2. (See Barry Building – Opinion of Probable Retrofit Cost, Hill International, November 6, 2024.) After reducing the June 27, 2024, cost estimate developed by Hill International (Attachment H to the Additional Cost Analysis) and accounting for the increase in construction costs due to the annualized inflation rate of 6.8%, Hill International determined that the cost to rehabilitate the Barry Building under this more limited scope of rehabilitation work is approximately $15,438,389. (See Barry Building Retrofit Scope Costs, Hill International, October 3, 2024.)

CBRE prepared an appraisal report for the Applicant considering the value of the rehabilitated Barry Building, complying with the California Historic Building Code per this scenario. CBRE compared similar recently sold properties and found that the price per square foot ranged from approximately $469 to $1,045. Excluding high and low extremes, CBRE determined the average price per square foot of comparable properties is approximately $630. CBRE used Hill's cost analysis of the minimum rehabilitation work required ($15,438,389) and reduced it by 20% to assume availability of a 20% rehabilitation tax credit. This assumption resulted in CBRE's estimate of cost to renovate the property at approximately $865 per square foot. This reduced cost is conservatively low as it does not include any indirect costs (which CBRE estimates could add 10-20%). CBRE's estimated cost of rehabilitation of $865 per square foot significantly exceeds the market price of the renovated property at $630 per square foot.

Based on the assumptions provided, CBRE determined that the resulting value of rehabilitating the Barry Building is approximately negative $3 million (excluding indirect costs). As a result, CBRE determined that the property has no (or negative) market value. (See Appraisal Report, CBRE, November 8, 2024.)

Alternative 2 would reduce or avoid the Projects impacts to Cultural Resources and Land Use but would result in greater impacts with respect to air quality, greenhouse gas emissions, noise, and traffic, as a result of an operational component, although these impacts would still be less than significant. Feasibility is defined by PRC Section 15364 as "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors." Although Alternative 2 would meet the Project objectives, and reduce some environmental impacts, substantial evidence in the administrative record submitted by the Applicant demonstrates that Alternative 2 would be economically infeasible.

Reference

See Draft EIR Section V for complete analysis of alternatives evaluated for the Project. See Appendices H-2, H-3, H-4, H-5, H-6, H-7 and G; Letter from E. Casey to J. Harris, RE: *11973 San Vicente Boulevard Prcject / ENV-2019-6645-EIR / State Clearinghouse No. 2020110210* (April

20, 2023) ("Initial Renovation Cost Analysis") and attachments; Letter from E. Casey to K. Bernstein (July 15, 2024) ("Additional Cost Analysis") and attachments; and Letter from E. Casey to J. McCrea, *RE: 11973 San Vicente Boulevard Prcject / ENV-2019-6645-EIR / State Clearinghouse No. 2020110210* (November 14, 2024) ("Updated Cost Analysis") and attachments.

Alternative 3 – Partial Preservation with New Construction Alternative

Description of Alternative

Alternative 3 includes the partial preservation of the existing building with new construction on the remaining portion of the Project Site. Specifically, Alternative 3 would preserve the south, east, and west wings of the building, the courtyard, and the south façade of the north wing. However, Alternative 3 would involve demolition of the building volume behind the south façade of the north wing. Alternative 3 would also include the work required to comply with the City's Soft Story Ordinance, as well as the voluntary seismic retrofit (see Appendix H-2 of the Draft EIR for a discussion of the work required to comply with the Soft Story Ordinance and the voluntary seismic retrofit), and ADA (see Appendix H-5 of the Draft EIR for a discussion of work need to comply with ADA requirements), building code, and energy efficiency upgrades, as described above for Alternative 2, to the preserved portion of the existing building.

In addition, Alternative 3 would include the construction of a new building behind the existing building (referred to as the "Annex"). The new building would be approximately 10,815 square feet in three stories (approximately 3,605 square feet per level). In total, Alternative 3 would include approximately 19,771 square feet of office and retail uses, consisting of 8,956 square feet of retail uses in the existing building and 10,815 square feet of office uses in the new building.

This work would be performed over an approximate seven-month period. Asbestos abatement activities, which would take place prior to all other work, are anticipated to last two weeks. Performing the additional preservation measures, as well as constructing the new office building, is estimated to take approximately seven months. Finishing activities, such as paving and application of architectural coatings, would take approximately one week each.

Impact Summary

As Alternative 3 involves the partial preservation of the existing building, Alternative 3 would avoid the Project's significant and unavoidable impacts with respect to historical resources and land use. However, as Alternative 3 involves the construction of a new building and also includes an operational component (the re-occupancy of the preserved portion of the existing building with retail uses and a new building with new office uses), Alternative 3 would result in greater impacts than the Project with respect to air quality, greenhouse gas emissions, noise, and traffic, although these impacts would still be less than significant.

Demolition of the Barry Building's north wing and grading for the proposed office building could result in substantial noise increases at nearby sensitive receptors. The resultant noise increase at the nearest sensitive receptor would be 12.5 dBA, which is above the City's significance threshold of 5 dBA. Without mitigation, this impact would be considered potentially significant. As a result, the following mitigation measure is required for Alternative 3:

> **ALT3 MM-1** Sound barriers rated to achieve a sound attenuation of at least 15 dBA shall be erected along the following boundaries:

- The east and west parking area boundaries (both the Project Site's east and west parking area boundaries and the east and west boundaries of the parcel immediately to the north of the Project Site (APN 4404-025-016)). (While the parcel to the north of the Project Site is not part of either the Project or Alternative 3, that parcel would be used for construction staging.)
- The northern property line of the parcel to the north of the Project Site (APN 4404-025-016) that separates this parcel from the residential uses to the north. Sound barriers along this property line shall be connected to the sound barriers described for the east and west property lines, so that all of Alternative 3's construction areas are fully enclosed by sound barriers.
- The sound barriers shall be tall enough to shield line of sight paths from operating paving equipment to the 2nd stories of nearby residential uses. The prescribed sound barriers shall be installed for the duration of Alternative 3's construction activities.

Finding

Specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the environmental impact report. (PRC 21081(a)(3))

Rationale for Finding

Alternative 3 would meet both of the Project objectives. However, studies provided by the Applicant demonstrate that it is economically infeasible.

The Initial Renovation Cost Analysis submitted to the record on April 20, 2023, by the Applicant (and identified above) considered the economic feasibility of Alternative 3. As with Alternative 2, CBRE prepared a pro forma valuation based on Alternative 3 of the Draft EIR (the "Partial Preservation with New Construction Alternative") which would involve renovation and preservation of approximately 70 percent of the existing Building and construction of additional commercial space on the remaining portion of the Project Site. Alternative 3 would involve demolition of the building volume behind the south façade of the north wing to accommodate the construction of an additional 10,815 square feet of commercial space (three stories high). In total, Alternative 3 would include approximately 19,771 square feet of office and retail uses. Alternative 3 results in the most leasable space in the renovated building of the alternatives identified.

Alternative 3 includes seismic retrofitting, ADA upgrades, Building Code compliance, and energy efficiency upgrades. As provided by the Applicant, Hill International prepared an analysis of the cost of completing this work as of November 2022. (See Attachment F to the Initial Renovation Cost Analysis.) CRBE considered the cost estimate prepared by Hill International and determined that the total cost of renovations, demolition, and construction of the additional annex was estimated at $19,646,307 as of March 2023. (See Attachment G to the Initial Renovation Cost Analysis.)

CBRE's 2023 analysis of the assumptions of Alternative 3, estimated the annual gross rental income for the retrofitted Barry Building at approximately $1,049,100, and the total value of the property at completion is $15,912,339. (See Attachment G to the Initial Renovation Cost Analysis.)

CBRE's 2023 analysis determined that to preserve the Barry Building per Alternative 3, the residual land value is $15,912,339 minus $19,646,307, or negative $3,733,908. (See Initial Renovation Cost Analysis.) CBRE found that this proposed project alternative returns a negative valuation. That is, CBRE calculated that the total costs of the necessary renovations and preparing the Barry Building per Alternative 3 for lease are estimated to be greater than the value of the renovated property. Although Alternative 3 offers the highest possible revenue for the preserved Barry Building by expanding leasable space of the Alternatives, CBRE's cost analysis found total costs of the necessary renovations and retrofitting to prepare the Barry Building for lease pursuant to Alternative 3 are greater than the value of the renovated property.

CBRE's 2023 analysis did not consider the potential availability of a 20 percent tax credit for the rehabilitation work[3] or the narrower scope of work available under the 75% Seismic Retrofit Scenario per the Historic Building Code,[4] which would call for 8,956 square feet of the building to be preserved under this Alternative. However, since CBRE prepared their analysis, Hill International identified that construction costs have risen significantly. According to Hill International's analysis, this escalation is primarily driven by higher labor costs, increased material prices, and rising transportation and disposal fees. (See Attachment H to the Additional Cost Analysis.) Hill International's June 2024 report notes that construction costs have risen by approximately 42.5 percent since their initial report was produced. In November, Hill International noted that construction costs have continued to rise. (See Attachment H to the Additional Cost Analysis; see also Updated Cost Analysis.) The Applicant determined that while these factors considered cumulatively would decrease the costs associated with construction under this Alternative by approximately $500,000, the reduction in costs available from the tax credit and the Historic Building Code were not sufficient to offset the negative $3,733,908 valuation identified by CBRE in 2023 in light of the significant increase in construction costs

CBRE and Hill International's analyses found that even with the additional commercial space included in Alternative 3, the sale price per square foot (approximately $630) is less than the cost per square foot of the necessary construction work ($970-$1,270 per Hill International's 2024 report) such that the additional construction required under Alternative 3 would not alter CBRE's finding of a negative valuation of the renovated property.

Alternative 3 would meet the Project objectives, avoid the Project's significant and unavoidable impacts to Cultural Resources and Land Use, while resulting in greater than the Project but still less than significant impacts with respect to air quality, greenhouse gas emissions, noise, and traffic. Feasibility is defined by PRC Section 15364 as "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors." Based on substantial evidence in the administrative record submitted by the Applicant, Alternative 3 would be economically infeasible.

Reference

See Draft EIR Section V for complete analysis of alternatives evaluated for the Project. See Appendices H-2, H-3, H-8, H-9, H-10, H-11 and G; Letter from E. Casey to J. Harris, RE: *11973 San Vicente Boulevard Prcject / ENV-2019-6645-EIR / State Clearinghouse No. 2020110210*

[3] This 20% tax credit under I.R.C. Treasury Regulations is discussed and considered in CBRE's 2024 analysis. (See Attachment I to the Additional Cost Analysis.)

[4] See also findings for Alternative 2 concerning the 75% Seismic Retrofit allowed under the Historic Building Code.

(April 20, 2023) and attachments; and Letter from E. Casey to K. Bernstein (July 15, 2024) ("Additional Cost Analysis") and attachments.

Alternative 4 – Relocation Alternative

Description of Alternative

Alternative 4 involves the dismantling of the Barry Building into multiple small building portions to facilitate its relocation to a new site, which has yet to be determined. At the new location, the Barry Building would be reconstructed, which would incorporate additional preservation measures relating to seismic retrofitting, ADA updates, building code updates, and energy efficiency upgrading that were described previously for Alternative 2. Once the Barry Building has been moved and rehabilitated, this analysis assumes that the Barry Building would be occupied by 12,800 square feet of retail uses.

HKA prepared a report analyzing four options to move the existing building to another site (see Appendix H-12 of the Draft EIR for this report), which are described below:

Option 1: Relocate virtually all building elements intact in one piece. This option was determined to be infeasible from a structural moving perspective, as the logistical challenges are extremely high. Besides undercutting beneath the building and then supporting the entire building while on the Project Site, it is infeasible to move the intact building in one piece once it is on City streets because of its size, particularly the building's width. Maneuverability would be infeasible to make turns from one street to another and due to the physical challenges (street trees, traffic signals, overhead wires, etc.) that would be encountered during the move. Therefore, HKA determined that Option 1 is infeasible due to these logistical challenges.

Option 2: This option considers partially dismantling the building elements into six parts at strategic vertical locations resulting in multiple two-story building portions which would be moved individually. This option proposes separating the north and the south two-story building elements from the connecting west and east two-story elements. This option also suggests removing, cataloging, and crating exterior stair elements, applied architectural features, such as aluminum sun-control fins, and applied architectural fixed-in-place wooden sun-control and ornamental architectural features. However, this option would present a number of transportation challenges. Even partially dismantled, the length of the building segments would make the transporting maneuverability infeasible at turns from one street to another street along the path from San Vicente Boulevard to a presently undetermined property. The overall height would also make this option infeasible for the same reasons as described for Option 1 (inability to clear street landscaping, utilities, street lighting, and traffic signals). Therefore, HKA determined that Option 2 is infeasible due to these logistical challenges.

Option 3: This option proposes partially dismantling the building elements at strategic horizontal locations into nine total pieces, thereby achieving multiple one-story building portions. In addition, strategic vertical separations would also be necessary to keep the overall length for each building element respectful to the architectural massing. Since the structure would be separated at a point above the second-floor plane but below the historic windows, the structure must be stabilized temporarily (addition of wood and steel beams, vertical and diagonal braces, diaphragms, and temporary floor construction to take place of the floor which will remain as part of the first story) to protect the construction from excessive movement during the relocation trip. This option also entails removing, cataloging, and crating exterior stair elements, applied architectural features, such as aluminum sun-control fins, and applied architectural fixed-in-place wooden sun-control

and ornamental architectural features. This option also presents a number of transportation moving challenges, as the overall length of the building elements would remain a challenge, which would make the transporting maneuverability difficult at turns from one street to another street along the path from San Vicente Boulevard to a presently undetermined property. The overall height may be less of a challenge with respect to clearance of street landscaping, utilities, street lighting, and traffic signals since the singular floor height would be substantially less than the building's two-story height. The work required under Option 3 would be performed over approximately 14-18 months. HKA identified that this option presents significant architectural destruction and damage when separating the building into portions for moving. Separating the two-story building would cause damage to the architectural exterior veneer plaster at the horizontal and vertical separations. As the overall building is separated into strategic portions to facilitate structural relocation, more and more damage and restoration will be required. HKA noted that restoring the veneer plaster at the separation locations would require feathering the plaster between the old and the new and/or installing screeds as plaster stops and expansion joints. This would result in significant degradation to the historic fabric of the building's exterior and to the character defining features.

Option 4: This portion proposes partially dismantling the building elements at strategic horizontal and vertical locations into 20 pieces achieving multiple small building portions. This option also entails removing, cataloging, and crating exterior stair elements, applied architectural features, such as aluminum sun-control fins, and applied architectural fixed-in-place wooden sun-control and ornamental architectural features. This option presents fewer transportation moving challenges and would make the transporting maneuverability somewhat easier at turns from one street to another street along the path from San Vicente Boulevard to a presently undetermined property. The overall height would likely be less of a challenge, for clearance of street landscaping, utilities, street lighting, traffic signals, and overhead power/telephone/cable lines since the singular floor height would be substantially less than an option where the building remains at two stories during the relocation. This option presents a temporary construction challenge (addition of wood and steel beams, vertical and diagonal braces, diaphragms, and temporary floor construction to take place of the floor which will remain as part of the first story) as previously discussed for Option 3, but this challenge is much more significant for Option 4, as a substantial amount of structure must be added to stabilize portions of the building temporarily to protect the building from excessive movement during the relocation trip. The work required under Option 4 would be performed over approximately 16-20 months.

As Options 1 and 2 were determined to be infeasible, the Draft EIR (Section V) addresses only Options 3 and 4 from the HKA report in detail. This analysis assumes that asbestos abatement activities, which would take place prior to all other work, are anticipated to last two weeks. Following this, preparing the Barry Building for dismantling and transporting would involve removing exterior elements and other ornamental features, as well as adding temporary stabilizing structures to portions of the building that would be transported. This is estimated to take approximately two months.

Reconstruction of the building would incorporate additional preservation measures relating to seismic retrofitting, ADA updates, building code updates, and energy efficiency upgrading. The differences between Option 3 and Option 4 chiefly concern whether the Barry Building would be dismantled into 9 or 20 pieces.

Reassembling the Barry Building and performing the additional preservation measures is estimated to take approximately 15 months. While a relocation site has not yet been identified, according to Historic Resources Group (see Appendix H-13 of the Draft EIR), the new site would have to be located on a similar commercial thoroughfare and have a similar flat topography as the Project Site. However, there is no limit to the distance from the old site to the new site within the City of Los Angeles, other than those limits imposed by physical and economic feasibility.

Impact Summary

All of Alternative 4's impacts would be less than significant, including with respect to historical resources (with mitigation) and land use. The Project would result in significant and unavoidable impacts with respect to historical resources and land use, as the Project would demolish the existing building, which is City HCM No. 887. As Alternative 4 involves the relocation of the existing building, Alternative 4 would avoid the Project's significant and unavoidable impacts with respect to historical resources and land use, with implementation of Mitigation Measure ALT4 MM-1 with respect to historical resources, as well as inclusion of the recommendations provided by Historic Resources Group (Appendix H-7 of the Draft EIR).

ALT4 MM-1 Potential mitigation measures to reduce the risks associated with disassembly of the Barry Building could include, but not necessarily be limited to, the following:

- Historic American Buildings Survey (HABS) documentation including photographs, drawings, and narrative, completed prior to the issuance of permits.
- Preparation of an Historic Structure Report (HSR) in conformance with Preservation Brief 43 prior to the issuance of permits, to document existing features, evaluate conditions, and recommend appropriate treatments.
- Preparation of a Relocation and Rehabilitation Plan, to be reviewed and approved by the City of Los Angeles Office of Historic Resources (OHR) prior to the issuance of any permits.
- Selection of a new site that meets the requirements of Criteria Consideration B as outlined in National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation.
- Inclusion of an historic architect on the Project team to monitor disassembly, relocation, and rehabilitation activities.
- Rehabilitation of the relocated Barry Building in conformance with the Secretary of the Interior's Standards for Rehabilitation (36 CFR 67) including replication of the historic cement plaster and reinstallation of salvaged architectural features.

However, Alternative 4 would be required to implement mitigation measures (Mitigation Measures ALT4 MM-2 through ALT4 MM-5) related to construction noise and vibration to ensure that that these impacts are less than significant at both the Project Site and the potential relocation site.

ALT4 MM-2 Sound barriers rated to achieve a sound attenuation of at least 15 dBA shall be erected along the following boundaries:

- The east and west parking area boundaries (both the Project Site's east and west parking area boundaries and the east and west boundaries of the parcel immediately to the north of the Project Site (APN 4404-025-016)). (While the parcel to the north of the Project Site is not part of either the Project or Alternative 4, that parcel would be used for construction staging.)
- The northern property line of the parcel to the north of the Project Site (APN 4404-025-016) that separates this parcel from the residential uses to the north. Sound barriers along this property line shall be connected to the sound barriers described

for the east and west property lines, so that all of Alternative 4's construction staging areas are fully enclosed by sound barriers.

The sound barriers shall be tall enough to shield line of sight paths from operating construction equipment to the 2nd stories of nearby residential uses. The prescribed sound barriers shall be installed for the duration of Alternative 4's relocation preparation and utilities removal phases.

ALT4 MM-3 Sound barriers rated to achieve a sound attenuation of at least 15 dBA shall be erected along perimeters of the future relocation site facing noise-sensitive receptors that are located less than 300 feet from the future relocation site. The sound barriers shall be tall enough to shield line of sight paths from operating construction equipment to any above-ground stories that these receptors may possess. The sound barriers shall be installed for the duration of Alternative 4's relocation preparation activities (including trenching for utility connections and grading for foundations), Barry Building reassembly and preservation activities, and any paving.

ALT4 MM-4 The Barry Building shall not be relocated to a future site that would require heavy-duty, steel-tracked construction equipment (or the vibrational equivalent thereof) to operate within 15 feet of structures that meet FTA Category III conditions or within 20 feet of structures that meet FTA Category IV conditions.

ALT4 MM-5 The Barry Building shall not be relocated to a future site that would require heavy-duty, steel-tracked construction equipment (or the vibrational equivalent thereof) to operate within 85 feet of residential land uses.

Finally, as Alternative 4 involves an operational component (the re-occupancy of the relocated Barry Building), Alternative 4 would result in greater impacts than the Project with respect to air quality, greenhouse gas emissions, noise, and traffic, although these impacts would still be less than significant.

Finding

Specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the environmental impact report. (PRC 21081(a)(3).)

Rationale for Finding

Within Alternative 4, four different options for relocation were identified by HKA Global Inc. (See Attachment H-12 to the Draft EIR.) Options 1 and 2 are technically infeasible. Options 3 and 4 are economically infeasible and are still likely to result in significant damage to the historical character of the Barry Building. All four options would require a relocation site, which has not been identified and may not be available. (See Attachment H-13 to the Draft EIR.)

The ability of Alternative 4 to meet the Project objectives depends on finding a new site for the Barry Building, which has not occurred, and the EIR could not include an analysis as to the feasibility of finding a new site without engaging in speculation.[5] However, assuming a new site

[5] As noted in Appendix h-13 to the Draft EIR, the new site would have to be located within the Los Angeles city limits, be located on a similar commercial thoroughfare and have a similar flat topography.

could be identified, the analysis provided in the EIR demonstrates that Alternative 4 may be able to meet both of the Project objectives, subject to economic factors, which were not addressed in the EIR.

HKA Global, Inc. provided an analysis to evaluate, and report on the feasibility of Alternative 4 of relocating the existing Barry Building to an off-site location while respecting and maintaining the historical "character defining features" of the building and its siting features. (See Appendix H-12 to the Draft EIR.) Options 1 and 2 as explained above were determined to be categorically infeasible due to street loading capacities and width limitations and maneuvering challenges (turning from one street to another).

Option 3 proposes partially dismantling the building elements at strategic horizontal locations into 9 total pieces. As noted in HKA's report, Option 3 presents significant logistical challenges, and also presents high risks to the historical character of the Barry Building. HKA determined that this option, while technically possible, would likely damage and destroy character defining features which will be difficult to restore, eliminating the benefit of preserving the historic characteristics of the building through relocation.

Option 4 would dismantle the building into 20 segments. While this option is technically feasible, HKA determined that it would be costly, and that the risks associated with the relocation and reassembly are high. This option presents the greatest risk to architectural and historical feature integrity of the building and the building's character defining features making this option least undesirable historical risk option if the desired effect is to protect the architectural integrity of the building.

Neither Option 3 or 4 is a practical option to meet the project's first objective, as both options would destroy character defining features and would present very high risks to the integrity of the building that could result in a significant adverse impact as defined by CEQA. (See Appendix H-12 and H-16.) However, even if the adverse impacts could be mitigated to a less than significant impact as outlined by HRG in Appendix H-16 to the Draft EIR, and assuming a suitable new site exists and can be obtained, Options 3 and 4 are economically infeasible. Feasibility is defined by PRC Section 15364 as "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors." As explained in Alternative 2, the cost to complete the necessary ADA upgrades and seismic retrofits such that the building and safely be occupied for use exceeds the value of the preserved building by approximately $5,663,653.[6] In this Alternative, the considerable additional cost for the relocation would mean the costs associated with relocation are likely much higher than Alternative 2, whereas the value of the preserved building (based on total leasable square footage) is unlikely to change significantly at its new location.

Reference

See Draft EIR Section V for complete analysis of alternatives evaluated for the Project. See Appendices H-12, H-13, H-14, H-15, and H-16 for additional supporting documentation.

The building would have to be able to be located in the same general orientation to the street, facing generally south, with similar setbacks, hardscape and landscape.

[6] If the necessary ADA upgrades and seismic retrofitting are forgone, the relocated building could not be occupied and this Alternative would not meet the second project objective.

Alternatives Rejected as Infeasible

As set forth in CEQA Guidelines Section 15126.6(c), an EIR should identify any alternatives that were considered for analysis but rejected as infeasible and no further analysis is provided in the EIR. For those rejected alternatives, the EIR should briefly explain the reasons for their rejection. According to the CEQA Guidelines, among the factors that may be used to eliminate an alternative from detailed consideration are the alternative's failure to meet most of the basic project objectives, the alternative's infeasibility, or the alternative's inability to avoid significant environmental impacts. Alternatives to the Project that were considered and rejected as infeasible include the following:

One alternative that was considered was mothballing the Barry Building in accordance with *Preservation Brief 31: Mothballing Historic Buildings,* prepared by the National Park Service. Preservation Brief 31 outlines the steps required to close up and temporarily protect an historic building for an extended period of time while planning its future use. Historic Resources Group prepared a memo that outlines the steps to properly mothball a building (see Appendix H-1 of the Draft EIR). However, mothballing is not a long-term solution that can achieve the project objectives, including compliance with the Soft Story Ordinance and therefore, this alternative was rejected.

Environmentally Superior Alternative

Section 15126.6(e)(2) of the CEQA Guidelines indicates that an analysis of alternatives to a project shall identify an Environmentally Superior Alternative among the alternatives evaluated in an EIR. The CEQA Guidelines also state that should it be determined that the No Project Alternative is the Environmentally Superior Alternative, the EIR shall identify another Environmentally Superior Alternative among the remaining alternatives. Pursuant to Section 15126.6(c) of the CEQA Guidelines, the analysis below addresses the ability of the alternatives to "avoid or substantially lessen one or more of the significant effects" of the Project.

Alternative 1 (the No Project Alternative) would be environmentally superior to the Project since this alternative would avoid the Project's significant and unavoidable impacts with respect to historical resources and land use. In addition, Alternative 1 would not include an operational component and, therefore, would not result in any operational impacts.

Among the remaining alternatives, Alternative 2 (the Preservation Alternative) is environmentally superior to Alternatives 3 and 4. As noted above, Alternative 2 would involve the work to comply with the City's Soft Story Ordinance, as well as a voluntary seismic retrofit and additional upgrades (like ADA compliance) in order to make the existing building suitable for occupancy. This Alternative would lessen the significant and unavoidable impacts to historic resources and land use/planning compared to the Project as it would not require demolition of the Barry Building. However, Alternative 2 would result in greater construction and operational impacts compared the Project.

Alternatives 2, 3, and 4 would all reduce the significant and unavoidable impacts to historic resources and land use/planning that would occur under the Project to less than significant levels. When compared to Alternative 2, Alternative 3 consists of more development and as such, would result in more impacts than Alternative 2.

Comparing Alternative 2 and Alternative 4, Alternative 4 would result in greater impacts with respect to the character-defining features of the Barry Building, and would therefore require the implementation of additional mitigation measures to avoid a significant impact with respect to historical resources. Alternative 4 would have greater impacts than Alternative 2.

Therefore, Alternative 2 is the Environmentally Superior Alternative.

However, the determination of the "environmentally superior" alternative does not include an evaluation of the feasibility of the environmentally superior alternative.

IX. Significant Irreversible Environmental Changes

Section 15126.2(d) of the CEQA Guidelines indicates that an EIR should evaluate any significant irreversible environmental changes that would occur should the proposed project be implemented. The types and level of development associated with the project would consume limited, slowly renewable, and non-renewable resources. This consumption would occur during construction of the project and would continue throughout its operational lifetime. The development of the Project would require a commitment of resources that would include: (1) building materials and associated solid waste disposal effects on landfills; (2) water; and (3) energy resources (e.g., fossil fuels) for electricity, natural gas, and transportation. The Project Site contains no energy resources that would be precluded from future use through Project implementation. For the reasons set forth in Section VI.3, of the Draft EIR, the project's irreversible changes to the environment related to the consumption of nonrenewable resources would not be significant, and the limited use of nonrenewable resources is justified.

The Project would necessarily consume a limited amount of slowly renewable and non-renewable resources that could result in irreversible environmental changes, including: (1) solid waste disposal effects on landfills; (2) water; and (3) energy resources. As explained in Section VI.3 of the Draft EIR, the Project would not consume a large commitment of natural resources or result in significant irreversible environmental changes.

Building Materials and Solid Waste

Solid waste was addressed in the Initial Study (included in Appendix A-1 of the Draft EIR). As discussed therein, the Project would demolish of the existing commercial building, which is expected to generate a total of approximately 4,174 cubic yards of debris, including 130 cubic yards of asbestos-containing material and 4,044 cubic yards of non-contaminated debris. The 130 cubic yards of asbestos-containing material would be entirely disposed of at the Azusa Land Reclamation Facility. Compliance with SB 1374 would require the recycling or salvaging of 75 percent of the remaining 4,044 cubic yards of debris. This would equate to approximately 1,011 cubic yards (or 404,400 pounds or 202 tons) that would be disposed of at a landfill over the course of demolition. The Initial Study determined that the landfills serving the Project Site would have adequate capacity to accommodate the solid waste generated by the demolition of the existing building. Because of the recycling of most of the solid waste generated by the Project, and the available capacity at landfills serving the Project Site, the Project's short-term solid waste disposal effects on landfills would be reduced.

Water

As stated in the Initial Study (included in Appendix A-1 of the Draft EIR), the Project would require a limited amount of water for dust control during demolition activities and to water the landscape

buffer planted along the fence after demolition has been completed. As discussed in the Initial Study, LADWP would be able to supply water for the Project's demolition activities and to water the landscape buffer based on its existing supply. Thus, while the Project would result in a limited amount of irreversible consumption of water, the Project would not result in a significant impact related to water supply.

Energy Consumption and Air Quality

The proposed construction activities would consume relatively minor quantities of electricity (i.e., temporary use for lighting and small power tools). This electricity would be supplied to the Project Site by the City of Los Angeles Department of Water and Power (LADWP) and would be obtained from the existing electrical lines that connect to the Project Site. Electricity consumed during demolition of the existing building and installation of the landscape buffer would be temporary and would cease upon the completion. Construction activities would also consume energy in the form of petroleum-based fuels associated with the use of construction vehicles, construction worker travel to and from the Project Site, and hauling truck trips. Based on the limited amount of equipment required and the limited duration of construction activities, the Project would require a negligible fraction of the State's total transportation fuel consumption. Therefore, the Project would not have an adverse impact on available electricity or fuel supplies.

The Project consists solely of the demolition of the existing building and the installation of a landscape buffer on the southern boundary of the Project Site. Development of the Project Site is not proposed and/or considered as part of the Project. Therefore, the Project would not have an operational demand for energy, with the exception of a limited amount of electricity for sprinklers to water the landscape buffer.

Overall, the Project would not result in the wasteful, inefficient, and unnecessary consumption of energy resources, and Project impacts would be less than significant.

Conclusion

Based on the above, the Project would require the irreversible commitment of limited, slowly renewable, and non-renewable resources, which would limit the availability of these resources for future generations or for other uses. However, the consumption of such resources would not be considered substantial. The loss of such resources would not be highly accelerated when compared to existing conditions and such resources would not be used in a wasteful manner. Therefore, although irreversible environmental changes would result from the Project, such changes are concluded to be less than significant, and the limited use of nonrenewable resources that would be required by the Project's construction activities is justified.

X. Growth-Inducing Impacts

Section 15126.2(e) of the CEQA Guidelines requires a discussion of the ways in which a proposed project could induce growth. This includes ways in which a project would foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Included in this are projects which would remove obstacles to population growth, or increases in the population which may tax existing community service facilities, requiring construction of new facilities that could cause significant environmental effects. Additionally, consideration must be given to characteristics of some projects which may encourage and facilitate other activities that could significantly affect the environment, either

individually or cumulatively. It must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment.

The Project consists of the demolition of the Barry Building. Once demolition is complete, the portion of the Project Site that currently contains the Barry Building would be a vacant lot, and the existing surface parking lot would remain. A landscape buffer would be installed along the southern boundary of the Project Site (fronting San Vicente Boulevard). Development of the Project Site is not proposed and/or considered as part of the Project. The demolition activities would require a daily maximum of 10 construction workers during any given day. The patterns of construction workers in Southern California are such that it is not likely that the workers for the Project would relocate their households as a consequence of being employed to conduct the Project's demolition work, especially given the short duration of demolition activities. Therefore, the Project would not be considered growth-inducing from a short-term employment perspective. Rather, the Project would provide a public benefit by providing employment opportunities during the demolition period.

As the Project does not include any new development on the Project Site, the Project would not result in a population increase at the Project Site due to new housing or employment opportunities that could result in substantial unplanned growth either directly or indirectly. Likewise, the Project also would not require any utility infrastructure improvements. Therefore, the Project would not result in any direct or indirect growth-inducing impacts.

XI. Energy Conservation

The Project's demolition activities would consume relatively minor quantities of electricity and fuel, particularly as the Project would be temporary. Electricity consumed during demolition of the existing building and installation of the landscape buffer would be temporary and would cease upon the completion. All construction and demolition equipment would meet applicable fuel efficiency standards.

The Project does not have an operational component and therefore would not have an operational demand for energy, with the exception of a limited amount of electricity for sprinklers to water the landscape buffer. The Project would not result in the wasteful, inefficient, and unnecessary consumption of energy resources.

XII. Statement of Overriding Considerations

The EIR identifies unavoidable significant impacts that would result from implementation of the Project. PRC Section 21081 and CEQA Guidelines Section 15093(b) provide that when a decision of a public agency allows the occurrence of significant impacts that are identified in the EIR, but are not at least substantially mitigated to an insignificant level or eliminated, the lead agency must state in writing the reasons to support its action based on the EIR and/or other information in the record. The State CEQA Guidelines require, pursuant to CEQA Guidelines Section 15093(b), that the decision-maker adopt a Statement of Overriding Considerations at the time of approval of a project if it finds that significant adverse environmental effects have been identified in the EIR that cannot be substantially mitigated to an insignificant level or be eliminated. These findings and the Statement of Overriding Considerations are based on the documents and materials that constitute the record of proceedings, including, but not limited to, the Final EIR and all technical appendices attached thereto.

Based on the analysis in Sections IV.B and IV.D of the Environmental Impact Analysis, of the Draft EIR, implementation of the Project would result in significant impacts to cultural resources (historical resources) and land use and planning (conflict with plans) that cannot be feasibly mitigated attributable to the demolition of an HCM.

Accordingly, the City adopts the following Statement of Overriding Considerations. The City recognizes that significant and unavoidable impacts would result from implementation of the project. Having (i) adopted all feasible mitigation measures, (ii) rejected as infeasible the alternatives to the project discussed above, (iii) recognized all significant, unavoidable impacts, and (iv) balanced the benefits of the project against the project's significant and unavoidable impacts, the City hereby finds that each of the project's benefits listed below outweigh and override the significant unavoidable impacts relating to the demolition of an HCM.

The below stated reasons summarize the benefits, goals and objectives of the Project, and provide the detailed rationale for the benefits of the Project. These overriding considerations of economic, social, aesthetic, and environmental benefits for the Project justify adoption of the Project and certification of the completed EIR. Each of the listed project benefits set forth in this Statement of Overriding Considerations provides a separate and independent ground for the City's decision to approve the project despite the project's identified significant and unavoidable environmental impacts. Each of the following overriding considerations separately and independently (i) outweighs the adverse environmental impacts of the Project, and (ii) justifies adoption of the Project and certification of the completed EIR. In particular, achieving the underlying purpose for the Project would be sufficient to override the significant environmental impacts of the Project.

1. The Project would remove an existing safety hazard and seismically unsafe structure, which includes significantly seismically overstressed building portions, in compliance with the Soft Story Ordinance, and objectives to protect public safety or possible occupants in the event of a moderate to severe earthquake;
2. The Project would remove an attractive nuisance, namely a building known to be vacant, that may give rise to break-ins and other unlawful behavior, and which could pose safety and other risks to the surrounding community and adjacent properties for unlawful behavior within a structurally unsound building;
3. The Project would pursue an economically feasible improvement to the property in a manner that will also benefit the surrounding community by removing public safety risks and health hazards;
4. The Project would create an additional vacant site that could accommodate housing or other commercially viable development in the future, built to more energy-efficient and structurally safer modern building codes, contributing to the City's Regional Housing Needs Assessment (RHNA) allocations and the City's critical housing need, or providing new commercial uses in line with smart growth policies and transit-oriented development; and
5. The Project would create jobs during demolition for construction workers in the City.

General Findings.

1. The City finds that the EIR was prepared in compliance with CEQA and the CEQA Guidelines. The City finds that it has independently reviewed and analyzed the EIR for the project, that the Draft EIR which was circulated for public review reflected its independent judgment and that the Final EIR reflects the independent judgment of the City.

2. The EIR evaluated the following potential project and cumulative environmental impacts: air quality, cultural resources, greenhouse gas emissions, land use and planning, noise, transportation and traffic, and tribal cultural resources, alternatives, and other CEQA considerations. Additionally, the EIR considered, in separate sections, Significant Irreversible Environmental Changes and Growth Inducing Impacts. The significant environmental impacts of the project and the alternatives were identified in the EIR.

3. The City finds that the EIR provides objective information to assist the decision makers and the public at large in their consideration of the environmental consequences of the project. The public review periods provided all interested jurisdictions, agencies, private organizations, and individuals the opportunity to submit comments regarding the Draft EIR. The Final EIR was prepared after the review periods and responds to comments made during the public review periods.

4. The City evaluated comments on environmental issues received from persons who reviewed the Draft EIR. In accordance with CEQA, the City prepared written responses describing the disposition of significant environmental issues raised. The Final EIR provides adequate, good faith and reasoned responses to the comments. The City reviewed the comments received and responses thereto and has determined that neither the comments received nor the responses to such comments add significant new information regarding environmental impacts to the Draft EIR. The Lead Agency has based its actions on full appraisal of all viewpoints, including all comments received up to the date of adoption of these findings, concerning the environmental impacts identified and analyzed in the EIR.

5. The Final EIR documents changes to the Draft EIR. Having reviewed the information contained in the Draft EIR, the Final EIR, and the administrative record, as well as the requirements of CEQA and the CEQA Guidelines regarding recirculation of Draft EIRs, the City finds that there is no new significant impact, substantial increase in the severity of a previously disclosed impact, significant new information in the record of proceedings or other criteria under CEQA that would require additional recirculation of the Draft EIR, or that would require preparation of a supplemental or subsequent EIR. Specifically, the City finds that:

    - The Responses to Comments contained in the Final EIR fully considered and responded to comments claiming that the project would have significant impacts or more severe impacts not disclosed in the Draft EIR and include substantial evidence that none of these comments provided substantial evidence that the project would result in changed circumstances, significant new information, considerably different mitigation measures, or new or more severe significant impacts than were discussed in the Draft EIR.

    - The City has thoroughly reviewed the public comments received regarding the project and the Final EIR as it relates to the project to determine whether under the requirements of CEQA, any of the public comments provide substantial evidence that would require recirculation of the EIR prior to its adoption and has determined that recirculation of the EIR is not required.

    - None of the information submitted after publication of the Final EIR, including testimony at the public hearings on the project, constitutes significant new

information or otherwise requires preparation of a supplemental or subsequent EIR. The City does not find this information and testimony to be credible evidence of a significant impact, a substantial increase in the severity of an impact disclosed in the Final EIR, or a feasible mitigation measure or alternative not included in the Final EIR.

- The mitigation measures identified for the project were included in the Draft EIR and Final EIR. The final mitigation measures for the project are described in the Mitigation Monitoring Program (MMP). Each of the mitigation measures identified in the MMP is incorporated into the project. The City finds that the impacts of the project have been mitigated to the extent feasible by the mitigation measures identified in the MMP.

6. CEQA requires the Lead Agency approving a project to adopt a MMP or the changes to the project which it has adopted or made a condition of project approval in order to ensure compliance with the mitigation measures during project implementation. The mitigation measures included in the EIR as certified by the City and revised in the MMP as adopted by the City serve that function. The MMP includes all of the mitigation measures and project design features adopted by the City in connection with the approval of the project and has been designed to ensure compliance with such measures during implementation of the project. In accordance with CEQA, the MMP provides the means to ensure that the mitigation measures are fully enforceable. In accordance with the requirements of Public Resources Code Section 21081.6, the City hereby adopts the MMP.

7. The custodian of the documents or other materials which constitute the record of proceedings upon which the City decision is based is the City of Los Angeles, Department of City Planning.

8. The City finds and declares that substantial evidence for each and every finding made herein is contained in the EIR, which is incorporated herein by this reference, or is in the record of proceedings in the matter.

9. The City is certifying an EIR for, and is approving and adopting findings for, the entirety of the actions described in these Findings and in the EIR as comprising the project.

10. The EIR is a project EIR for purposes of environmental analysis of the project. A project EIR examines the environmental effects of a specific project. The EIR serves as the primary environmental compliance document for entitlement decisions regarding the project by the City and the other regulatory jurisdictions.

INFORMATION BULLETIN / PUBLIC – BUILDING CODE
REFERENCE NO.: Effective: 01-01-2023
DOCUMENT NO.: P/BC 2023-149 Revised:
Previously Issued As: P/BC 2020-149

PROCEDURE FOR PROCESSING "ERROR OR ABUSE OF DISCRETION" APPEALS OF LADBS ACTIONS TO THE BOARD OF BUILDING AND SAFETY COMMISSIONERS

This Information Bulletin provides the procedure for processing requests for Modification of Building Ordinances (Request for Modification) and, subsequently, appeals alleging error or abuse of discretion by the Los Angeles Department of Building and Safety ("LADBS") concerning the City of Los Angeles Building Code (LABC) or other items within the powers of the Board of Building and Safety Commissioners (BBSC) as granted by LAMC 98.0403.1(b). Such appeals shall be filed in accordance with procedures outlined in LAMC Section 98.0403.2.

LADBS staff uses the following guidelines to process appeals filed under LAMC 98.0403.2:

1. PROCESSING FEES

The customer shall complete the Request for Modification Form and provide the request to the LADBS staff member along with exhibits and any pertinent information for the request. The LADBS staff member's supervisor will determine the processing fees pursuant to LAMC Section 98.0403.2(a) and refer the customer to cashier with (3) copies. Processing fees are $130.00 for the first item and $39.00 for each additional item, plus $208.00 for two (2) hours of research. For complex requests requiring more than two (2) hours of research, an additional research fee may be imposed.

Note: At satellite offices where cashiers are not available, the appellant may leave a check or money order made out to the "City of Los Angeles" for the appropriate amount. LADBS shall process the application and send a copy with receipt of payment to the appellant.

2. DETERMINATION

The LADBS Staff member's supervisor shall make a determination to grant, grant with conditions, or deny the Request for Modification and provide said information to the customer. If dissatisfied with the supervisor's interpretation, the customer can file an appeal under LAMC Section 98.0403.2(b).

LAMC Section 98.0403.2(b). appeals shall be submitted to the Chief Inspector, Building Civil Engineer and above in charge of the office where the determination was made. (The term "Manager" shall be used hereinafter to describe this senior staff position.)

If the Manager determines that LADBS neither erred nor abused its discretion in making the determination, and the appellant wishes formally to initiate the appeal process, the Manager shall provide the required "Supplemental Application for Appeals" Form (Appeal Form) and

As a covered entity under Title II of the Americans with Disabilities Act, the City of Los Angeles does not discriminate on the basis of disability and, upon request, will provide reasonable accommodation to ensure equal access to its programs, services and activities. For efficient handling of information internally and in the internet, conversion to this new format of code related and administrative information bulletins including MGD and RGA that were previously issued will allow flexibility and timely distribution of information to the public.

instruct the appellant how to complete the form.

The appellant must itemize the grounds for the appeal, along with applicable LAMC sections, on the Appeal Form. The Request for Modification Form and any evidence supporting the appeal, such as photographs and correspondence should be submitted as an attachment to the appeal form.

No additional information will be accepted by the Department after the appeal form has been submitted unless a new appeal form is filed and applicable fees are paid.

3. REVIEW OF APPEAL FORMS AND FEE FOR WRITTEN REPORT

The Manager shall review the appeal package for completeness. If the Manager determines that the form and all attachments clearly state the grounds for the appeal and cannot be approved administratively, the Manager shall complete the fees portion on page two of the Request for Modification form as outlined in LAMC Section 98.0403 (b) and refer the customer to cashiers with (3) copies. Filling fees are based on the subject of the request as set forth in Tables 4A or 4B plus $104.00 for (1) hour of research.

4. ROUTE ORIGINAL APPEAL PACKAGE

After the fees are paid, the appellant shall return the original appeal package and a copy of the paid request for modification form to the Manager. The Manager shall ensure that the appellant's original appeal package is hand delivered to the Commission Office. The Commission staff shall log the appeal by assigning a case number, creating a case file and assigning the case to the responsible manager.

5. WRITTEN DETERMINATION

The Manager assigned to the case shall prepare a report and presentation setting forth the justifications and findings for LADBS's determination, specifically addressing the appellant's issues. The report shall be completed within 60 days from the date of the appeal's submittal and the item shall be scheduled for the next available BBSC hearing date. For complex requests, additional time may be required to complete the report.

6. NOTIFICATION OF PUBLIC HEARING

When the appeal is scheduled for a hearing before the BBSC, the Commission staff shall notify the appellant through a written notice at least ten days prior to the date of the hearing. The notice shall be given by email or U.S. mail.

As a covered entity under Title II of the Americans with Disabilities Act, the City of Los Angeles does not discriminate on the basis of disability and, upon request, will provide reasonable accommodation to ensure equal access to its programs, services and activities. For efficient handling of information internally and in the internet, conversion to this new format of code related and administrative information bulletins including MGD and RGA that were previously issued will allow flexibility and timely distribution of information to the public.

REQUEST FOR MODIFICATION OF BUILDING ORDINANCES

UNDER AUTHORITY OF L.A.M.C. SECTION 98.0403

PERMIT APP. #:	**DATE:**	**For City Dept. Use Only** **Building Zoning** **Grading Shoring** **Mech. Elec. Plumb.** **Green D.A. Misc.**
JOB ADDRESS:		
Tract:	**Block:** **Lot:**	
Owner: Address: City State Zip Phone	Petitioner: Address: City State Zip Phone	

REQUEST (SUBMIT PLANS OR ADDITIONAL SHEETS AS NECESSARY) | CODE SECTIONS:

JUSTIFICATION (SUBMIT PLANS OR ADDITIONAL SHEETS AS NECESSARY)

Owner/Petitioner Name (Print) **(Signature)** **Position**

FOR CITY DEPARTMENT'S USE ONLY BELOW THIS LINE

Concurrences required from the following Department(s)			Approved	Denied
☐ Los Angeles Fire Department	Print Name_____	Sign_____	☐	☐
☐ Public Works Bureau of Engineering	Print Name_____	Sign_____	☐	☐
☐ Department of City Planning	Print Name_____	Sign_____	☐	☐
☐ Department of County Health	Print Name_____	Sign_____	☐	☐
☐ Other _____	Print Name_____	Sign_____	☐	☐

DEPARTMENT ACTION

☐ **GRANTED** ☐ **DENIED**

Reviewed by: (Staff) (Print) ***Sign*** ***Date***

Action taken by: (Supervisor) (Print) ***Sign*** ***Date***

NOTE: IN CASE OF DENIAL, SEE PAGE #2 OF THIS FORM FOR APPEAL PROCEDURES

CONDITIONS OF APPROVAL (Continued on Page 2):

For Cashiers Use Only

(PROCESS ONLY WHEN FEES ARE VERIFIED)

(DEPARTMENT USE ONLY)

FEES

Appeal Processing Fee.. (No. of Items) =	1	X $130 + $39/addl	= 130.00
Inspection Fee ..... (No of Insp.) =		X $ 84.00	=
Research Fee ... (Total Hours Worked) =	2	X $104.00	= 208.00
Subtotal			= 338.00
Development Services Center Surcharge		X .03	= 10.14
Systems Development Surcharge		X .06	= 20.28
Total Fees			= 368.42

Fees verified by:

Print and Sign _____

Permit App #:	Job Address:

CONDITIONS OF APPROVAL (Continued from Page 1)

CITY OF LOS ANGELES
BOARD OF BUILDING AND SAFETY/DISABLED ACCESS COMMISSION APPEAL FORM

(Must be Attached to the Modification Request Form, Page 1)

AFFIDAVIT – LADBS BOARD OF BUILDING AND SAFETY COMMISSIONERS – RESOLUTION NO. 832-93

I, _____ do state and swear as follows:
(Print or Type Name of the Person Signing this Form)

1. The name and mailing address of the owner of the property (as defined in the resolution 832-93) at _____ as shown on the appeal application (LADBS Com 31) are correct, and
2. The owner of the property as shown on the appeal application will be made aware of the appeal and will receive a copy of the appeal.

I declare under PENALTY OF PERJURY that the forgoing is true and correct.

Owner's Name(s) _____ _____
(Please Type or Print) (Please Type or Print)

Owner's Signature(s) _____ (Two Officers' Signatures Required for Corporations)
(Please Sign)

Name of Corporation _____ _____
(Please Print Name of Corporation) (Please Type or Print)

Dated this _____ day of _____ 20_____

CALIFORNIA ALL-PURPOSE ACKNOWLEDGEMENT----------SIGNATURE(S) MUST BE NOTARIZED

State of **CALIFORNIA** County of _____ on _____

before me, _____, personally appeared _____,
Name, Title of Officer (e.g. Jane Doe, Notary Public) Name(s) of Signer(s)

who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument in person(s), or the entity upon behalf of which the person(s) acted, executed the instrument. **I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing is true and correct.**

WITNESS my hand and official seal. Signature _____

As a covered entity under Title II of the Americans with Disabilities Act, the City of Los Angeles does not discriminate on the basis of disability and, upon request, will provide reasonable accommodation to ensure equal access to its programs, services and activities.

APPEAL OF DEPARTMENT ACTION TO THE BOARD OF BUILDING AND SAFETY COMMISSIONERS/DISABLED ACCESS APPEALS COMMISSION

_____ _____
Applicant's Name Applicant's Title

_____ _____
Signature Date

FEES **(DEPARTMENT USE ONLY)**

Board Fee ..... (No. of Items)	1	X $354 +$215/addl	=	354.00
Inspection Fee ..... (No of Insp.) =		X 84.00	=	0.00
Research Fee ... (Total Hours Worked) =	2	X 104.00	=	208.00
Subtotal			=	562.00
Development Services Center Surcharge		X .03	=	16.86
Systems Development Surcharge		X .06	=	33.72
Total Fees			=	612.58

Fees verified by:

Print and Sign _____

For Cashiers Use Only
(PROCESS ONLY WHEN FEES ARE VERIFIED)

SUPPLEMENTAL APPLICATION FOR APPEALS

TYPE OF APPEAL:

- ☐ BUILDING CODE APPEAL
- ☐ ZONING CODE APPEAL
- ☐ INSPECTION / CODE ENFORCEMENT APPEAL

PROJECT TYPE:

- ☐ ONE OR TWO FAMILY RESIDENTIAL
- ☐ MULTI-FAMILY RESIDENTIAL
- ☐ COMMERCIAL/INDUSTRIAL

PERMIT APPLICATION:		
ADDRESS:		ZIP:
TRACT:	BLK:	LOT:
OWNER NAME:	OWNER ADDRESS:	ZIP:

APPLICATION INFORMATION:

NAME:	ADDRESS:	ZIP:
EMAIL:	APPLICANT SIGNATURE:	DATE:

ISSUES:	VIOLATION:	CODE SECTION:
1.		
2.		
3.		

- ❖ FOR ADDITIONAL ISSUES, ATTACH TO THIS APPLICATION
- ❖ ATTACH ALL APPLICABLE EXHIBITS AND EVIDENCE TO THIS APPLICATION

SUPPLEMENTAL APPLICATION FOR APPEALS

ISSUES:	VIOLATION:	CODE SECTION:
4.		
5.		
6.		
7.		
8.		
9.		

Re: TIME SENSITIVE ... Requesting your Assistance regarding LADBS' Appeals Form "INFORMATION BULLETIN / PUBLIC – BUILDING CODE REFERENCE NO.: Effective: 01-01-2023 DOCUMENT NO.: P/BC 2023-149"

From: Veronica Lopez (veronica.lopez@lacity.org)

To: ziggykruse2005@yahoo.com

Cc: bob.blue@live.com

Date: Monday, June 30, 2025 at 05:02 PM PDT

Good Afternoon Ziggy,

My phone's voicemail system has not been working for some time. I have notified our Technical Service Bureau and they are working on it. It appears to be a City wide issue.

Unfortunately, I do not have an example I can share as your appeal is the first of its kind.

The "Request for Modification of Building Ordinance" is the correct form for appeals. You must first complete page 1 of this form and provide supporting documents. The Department will then make the determination to grant, grant with conditions or deny the appeal.

You may appeal the Department determination to the Board of Building and Safety Commission. If you choose to, LADBS staff will charge Board fees on page 2 of this form and ask that you complete the "Supplemental Application for Appeals"
form and provide an appeal brief.

The code section you are appealing is LABC section 106.4.5. Refer to the attachment.

Please let me know if additional assistance is needed.

Regards,

Veronica Lopez
Department of Building & Safety, City of Los Angeles
Commission Office - Board Secretary
Structural Engineering Associate
201 N. Figueroa St., Room 1030
Los Angeles, CA 90012
(213) 482-7429

Please note my Regular-Day-Off (RDO) is every other Friday.

For general Zoning and Building code questions, please refer to our call center at 311 or (213) 473-3231 to speak with an LADBS Call Center Engineer. Also, for additional information you may visit our website at dbs.lacity.gov

> On Mon, Jun 30, 2025 at 4:19 PM Ziggy Kruse <ziggykruse2005@yahoo.com> wrote:
>
> Hello Veronica:
>
> I hope that you are doing well and that you are ready to embrace the upcoming long weekend.

Also, I've tried reaching you by phone, but it just kept on ringing and never went anywhere, not even a voicemail.

Please provide an example of a filled out APPEAL FORM that we can use as a template for the Appeal of the 06-06-2025 Letter of Determination (LOD) from the Los Angeles Department of Building and Safety. I would like to receive this example by either end of day today, but no later than tomorrow 1:00 PM.

I am only asking for a "rush" response since the form that was provided as Attachment "B" with the LOD (dated 06-06-2025) does not appear to be appropriate for the Appeal. (see attached)

However, if there has been an appeal already filed for either this case, or any previous case related to LADBS certifying an EIR, please provide a copy of that filled out Appeal form.

Otherwise, please help us fill out the form so that it can be included with the Appeal before the looming deadline is passed.

I thank you in advance for your assistance regarding this time sensitive matter.

Sincerely,
Ziggy



section 106.4.5.pdf
181.5 kB

TRANSCRIPT OF

CULTURAL HERITAGE COMMISSION

REGULAR MEETING

CITY OF LOS ANGELES

SEPTEMBER 5, 2024

AGENDA ITEM NUMBER 4

CHC-2007-1585-HCM

BARRY BUILDING, HCM #887

(https://planning.lacity.gov/plndoc/Audio/CHC/2024/09-05-2024/4_CHC_2007_1585.mp3)

COMMISSION PRESIDENT MILOFSKY: Moving on to item number four, agenda item number four, the Barry Building. Lambert?

MR. GIESSINGER: Yes, good morning, Commissioners. Lambert Giessinger, for the record. The item before you is related to the proposed demolition of the Barry Building, historic cultural monument number 887, located at 11973 to 11975 San Vicente Boulevard in Brentwood.

The Planning Department has prepared an Environmental Impact Report as required for the proposed demolition. And the Department of Building and Safety is charged with its certification since there is no replacement project. The Department of Building and Safety sent a letter to the commission on May 9th, requesting the commission's recommendation on the certification of the EIR, and whether or not there are potentially overriding considerations to justify the demolition of a historic cultural monument.

Melissa Jones of OHR staff and Mindy Nguyen of the Planning Department's major projects section who prepared the EIR are here to present the staff report. Additionally, Hector Buitrago of the Department of Building and Safety is here if the commission has any questions for him.

MS. JONES: Good morning, Commissioners. Melissa Jones from Office of Historic Resources, for the record. The proposed project is the demolition of the Barry Building, historic cultural monument number 887. The portion of the project site that currently contains the Barry Building would become a vacant lot. A landscape buffer is proposed to be installed along the southern boundary of the project site fronting San Vicente Boulevard. However no future development of the site is proposed and/or considered as part of the project.

For reference, the Barry Building is located on the north side of San Vicente Boulevard, between Montana Avenue and Saltair Avenue in Brentwood. This is west of the 405 Freeway, adjacent to the Brentwood Country Club. The building is situated along San Vicente Boulevard Commercial Corridor, within the median of which are the coral trees which are designated as historic cultural monument number 148.

Built in 1951, this two story commercial building was designed by Los Angeles architect, Milton H. Caughey, for David Barry, Jr., as ground floor retail with four wings of offices around a central courtyard, lushly landscaped with tropical plants. First housing Brentwood Books in 1960 and subsequently Dutton's

Brentwood Books starting in 1984, the building's ground floor storefront and courtyard served the Brentwood community as a bookstore and café for nearly 50 years until 2008. The building has been vacant and fenced off since 2017.

The building's international style modern architectural design is reflected in its flat roof, with wide overhanging eaves, smooth stucco cladding, floor to ceiling grid and louver windows on the interior courtyard, and horizontal band of windows originally screened with louvered wood grills on the primary south facing façade. The grills were removed without approvals in 2016.

The second story floats above the first floor storefronts and opening to the courtyard. The courtyard is landscaped with raised flagstone and concrete planters containing a variety of palm trees, as well as four steel framed benches with wood slat seating and backing.

Two curved staircases, one in the northeast corner and one in the southwest corner, provide access to the cantilevered second story exterior walkway that encircles the courtyard. Each staircase consists of a floating concrete treads in steel pans, supported on triangular concrete mono stringers. Steel pipes

support both the stairs and second floor walkway railings, with exposed detailing such as exposed metal plates and bolts serving as decorative elements. Louvered and gridded wood screen shelter portions of the east and west balconies. A passage at the northeast corner of the courtyard connects it to a rear parking lot.

The City Council designated the Barry Building as historic cultural monument number 887 in 2007, finding that it was significant under two of the cultural heritage ordinance criteria. Firstly, that it reflects the broad cultural, economic, or social history of the nation, state, or community, as the long time home of Dutton's Brentwood Bookstore, a symbol of the Los Angeles literary scene, that contributed to the growth and development of the San Pimente [sic] -- San Vicente Commercial Corridor in Brentwood.

And secondly, that it embodies the distinguishing characteristics of an architectural type specimen inherently valuable for a study of a period style of method of construction, as a distinguished example of international style architecture.

There was a previous attempt to demolish the Barry Building in 2009. The current property owner filed an application for the redevelopment of the site

containing the subject property into a new commercial center.

At this time the Commission reviewed the Environmental Impact Report for that project. It expressed concerns over the proposed demolition of the Barry Building. In a formal letter addressed to the City Planning Commission, the Commission opposed the demolition of the Barry Building and supported a preservation alternative that retained and integrated the building into a proposed project.

The Commission stated, quote, any concerted effort to purposely demolish an 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 the Barry Building can be integrated into new development, while also meeting and exceeding the goals of the proposed project. Other projects throughout the city of Los Angeles have been successful in incorporated historic cultural monuments through the guidance and support of the Cultural Heritage Commission and its Office of Historic Resources. The Commission reiterated that, quote, we strongly support sensitive

reuse of historic resources, unquote.

The applicant withdrew the application for the proposed Green Hollow Square development project in October 2013. In 2014 the Los Angeles Department of Building and Safety inspected the Barry Building and it was determined that it falls within the scopes of the city's soft story retrofit program.

In 2018 the building's department notified the owner of the need for compliance. Mandatory compliance with the city's ordinance can be achieve -- achieved through a structural retrofitting or demolition. However, the demolition option applies generally to buildings that are subject to the soft story retrofit program and does not specifically address historical buildings.

In 2019 the current property owner of the Barry Building applied for permits to demolish the building, with no further plans for development of the site. This proposed demolition of an historic cultural monument triggered a review under the California Environmental Quality Act, commonly known as CEQA, and necessitated the [inaudible] Environmental Impact Report.

My colleague Mindy Nguyen from the major projects unit of our department will now walk through -- the

Commission through some background on CEQA and the Environmental Impact Report that was prepared for the proposed demolition.

MS. NGUYEN: Good morning, Commissioners. Thank you, Melissa. Again, I'm with the major projects section of the City Planning Department. And I'll be providing a brief overview of the California Environmental Quality Act, also known as CEQA, and how it relates to the Barry Building project.

Adopted in 1970, CEQA requires a disclosure of potential impacts and any feasible mitigation of significant impacts to the public and decision makers. Typically a CEQA clearance is only required for discretionary projects. While demolition without a proposed project such as the Barry Building is technically considered a ministerial project, the demolition of an historic resource requires the preparation of an Environmental Impact Report, or EIR.

During the preparation of an EIR, there are multiple opportunities from input -- for input from the public, as well as state and local agencies. An EIR is typically comprised of an initial study, draft EIR, and final EIR, and is required to study specific topics provided by the state, which I'll share in the next slide.

There are a total of 16 topics shown here, one of the most important ones being cultural resources, for the specific project before us today. During the initial study phase, the city determined what topics have no or less than significant impacts. These topics can be scoped out.

For the Barry Building project these topics are shown in gray text. Any remaining topics would have to undergo a more in depth analysis in the draft EIR to determine if there will be any significant impacts and whether they can be mitigated. For the Barry Building project these topics are shown in blue text. Any comments in the draft EIR are then responded to in the final EIR.

This slide goes over the environmental review timeline for the Barry Building. The initial study was published in November 2020 with a 30 day public comment period. As shown on the previous slide, a number of topics were scoped out due to the nature of the project, with seven topics identified for further study in the draft EIR.

The draft EIR was published in February 2023 with a 45 day public comment period, and analyzed air quality, cultural resources, greenhouse gas emissions, land use and planning, noise, transportation, and

tribal cultural resources. Impacts to all categories were found to be either less than significant or could be mitigated to less than significant, except for cultural resources and land use planning.

The final EIR was published in September 2023, responded to a total of 105 public comments received in the draft EIR, including comments from the LA Conservancy and Council District 11, and addressed two minor corrections in the draft EIR.

The next step requires the Los Angeles Department of Building and Safety to decide whether or not they will certify the EIR, adopt a Statement of Overriding Considerations, and adopt the environmental findings. As mentioned there were only three categories that resulted in significant impacts. The first is noise, which could be mitigated to less than significant, with the implementation of sound barriers to reduce construction noise by 15 decibels along the north, east, and western property lines.

The other two topics were cultural resources and land use and planning, both of which resulted in significant and unavoidable impacts as the project is demolishing an historic resource. While a mitigation measure was included to require a historic American building survey report in consultation with the Office

of Historic -- of Historic Resources, to document and file a visual and written history and description of the existing building, even after implementation, impacts would remain significant and unavoidable as the resource would be removed.

In compliance with CEQA, four alternatives were analyzed for the project. The no project alternative involves retaining the existing building and seismically retrofitting the south wing. The preservation alternative includes soft story seismic retrofit work, and additional structural improvements, ADA renovations, and building code and energy efficiency upgrades to the existing building.

The preservation with new construction alternative involves part of the building undergoing preservation and renovation for occupancy, while the other part is demolished and replaced with a new commercial annex. And finally the relocation alternative involves dismantling and reassembled the existing building at a new location that has yet to be determined.

As previously mentioned, this is considered a ministerial project, which means that the Los Angeles Department of Building and Safety is responsible for certifying the EIR. If they decide to approve the

project in light of the significant and unavoidable impacts, they must adopt a Statement of Overriding Considerations along with the environmental findings.

In making a Statement of Overriding Considerations, the city must have adopted all feasible mitigation measures, rejected as infeasible the alternatives to the project, recognized all significant unavoidable impacts, and balanced the benefits of the project against the project's significant and unavoidable impacts.

Each statement must separately and independently outweigh the adverse environmental impacts of the project, and justify adoption of the project and certification of the completed EIR. I'll now hand the presentation back to Melissa to go over the applicant's SOC.

MS. JONES: Melissa Jones, again for the record. The -- the property owner has drafted a Statement of Overriding Considerations, which is attached to their letter dated July 15, 2024, and linked to affirm our staff report in your agenda packet. In their draft statement, the owner has described four considerations as benefits to the demolition of the Barry Building historic cultural monument. We will go through each one and provide a recommendation on how the benefits

do not outweigh the significant environmental impacts.

Firstly, the first consideration is that the demolition of the Barry Building would attain, quote, the removal of an existing safety hazard and seismically unsafe and noncompliant structure, unquote. The subject building was constructed in 1951 and has withstood the test of time, remaining standing over the past 70 years.

It has withstood multiple significant seismic events, including the San Fernando earthquake in 1971, the Whittier Narrows earthquake in 1987, as well as the Northridge earthquake in 1994. At the time that the building was vacated in 2016, the subject building was not deemed a dangerous or unfit for human habitation by the building department, nor was it slated to be condemned.

Secondly, the owner states that the demolition would, quote, remove -- remove an attractive nuisance for vandals, transient populations, loitering, and other unlawful behavior, unquote. It can be argued that the property owner created this problem by voluntarily vacating the building and leaving it to be unoccupied for over eight years.

The proposed project is to demolish the building, rendering the site a vacant lot, with no proposed

replacement structure. In the balancing test of a project's public benefit versus its impacts to historical resources under CEQA, a vacant lot frequently contributes to additional community problems, serving as a further detriment, while not conferring any additional benefits.

As of 2015, there were over 20,000 vacant lots in the city of Los Angeles. As it is commonly known, vacant lots inclusive of vacant buildings can have negative impacts on communities that include increases in crime, vagrancy, damaging effects on mental and physical health, a reduction in values of neighboring properties, and decreased property tax revenue. Vacant lots also detract from the efforts to create cohesive, vibrant, and pedestrian friendly neighborhood commercial corridors, such as the San Vicente Commercial Corridor.

Prior to 2014, as you see on the screen, there were buildings on the lots surrounding the subject building, all of which are currently owned by the owner of the Barry Building. Demolition permits were issued for the buildings surrounding the Barry Building in February of 2014. And by October 2014, the lots surrounding the Barry Building were cleared, creating additional vacant lots that have remained so

for the past 10 years.

A third consideration highlighted by the property owner is that the demolition of the Barry Building will, quote, clear the existing property of noncompliant structures in a manner that will not preclude any future development consistent with existing zoning. One of the primary objectives of the Brentwood Pacific Palisades Community Plan is to, quote, preserve and enhance neighbors with a distinctive and significant historic character. The plan actively promotes the protection and reuse of the area's historic resources through its policies.

Nevertheless, retaining the subject building does not preclude a future project that may involve the demolition of the building and construction of a new building. As stated by the applicant, there is not a foreseeable project. So it is not in appropriate to weigh the purely speculative benefit of clearing the lot for an unknown future project.

Lastly, a fourth consideration stated as a benefit outweighing the environmental impacts of demolishing the historic cultural monument, is that complying with the soft story retrofit program through demolition is the only economically feasible course of action. Majority of buildings subject to the ordinance

have complied the retrofitting, not through demolition.

Out of the over 880,000 parcels in the city of Los Angeles, only 12,347 buildings are subject to the soft story retrofit program. From the date a notice of compliance is issued for a property, owners have seven years to fully comply with the ordinance. As shown here on the screen, there are various milestones to reach full compliance. By year two, plans are to be submitted. And after three and a half years, permits are to be issued. And by year seven, the project is to be completed, marked by the issuance of a certificate of compliance.

As of February 2024, 76 percent of properties subject to the ordinance have achieved full compliance. Only 30 of these, or 0.2 percent, complied through demolition. None of the 30 properties that complied through demolition were designated historic cultural monuments.

According to the applicant, only three other historic cultural monuments are subject to the soft story retrofit ordinance, all of which have complied with the ordinance by retrofitting their buildings. These three buildings include the Roberts Apartments, historic cultural monument number 1185 in Silverlake,

which complied with the ordinance in 2020. The Elkay Apartments, which is designated as historic cultural monument number 368, located in Westwood, that complied with the ordinance in 2022. Lastly, the Sheats Apartments, designated historic cultural monument number 367, also located in Westwood, which complied with the ordinance in 2022.

The property owner argues that the benefit of the project is the, quote, removal of an existing safety hazard, and seismically unsafe and noncompliant structure, end quote. However, it is arguable that substantial evidence does not support that it is necessary to demolish the building to attain this, quote, benefit. Compliance with the soft story retrofit program only requires the soft façade of the building to be retrofitted, and would not require any accessibility upgrades.

As an historical resource, the subject building would be able to utilize the California Historical Building Code, which provides alternative building regulations for permitting repairs, alterations, and additions necessary for the preservation, rehabilitation, relocation, related construction, change of use, or continued use of a qualified historical building or structure.

Specifically, the code is intended to provide for reasonable safety from fire, seismic forces, or other hazards, for occupants and users of such buildings, structures, and properties, and to provide reasonable availability and usability by the physically disabled. In addition, if upgrades were pursued, the Americans with Disabilities Act, also known as ADA, enables designated historical properties to meet alternative standards if full compliance with the regular code would threaten or destroy the historical significance of the property. As such, while it might be a benefit to remove the hazard, demolition is not necessary.

Apart from the potential loss of the designated historical resource, demolition of the structure would have other impacts. The Barry Building is one of the rare examples of commercial mid-20th century modern design, designated as historic -- an historic cultural monument.

In fact, a preliminary review suggests that out of over 1,300 designated historic cultural monuments, the Barry Building is only one of a handful of modernist commercial buildings that include the CBS Columbia Square Studios, designated as historic cultural monument number 947, the Musicians Union of

Hollywood, designated as historic cultural monument number 1158, as well as the Jones and Emmons Building, HCM number 696, as well as the Neutra office building, historic cultural monument number 676.

Further, of the 51 historic cultural monuments in the Brentwood Pacific Palisades Community, there are only two other commercial buildings, which include the gas station on South Barrington Avenue, designated as historic cultural monument number 387, and the Pacific Palisades Business Block on Sunset Boulevard and Via De La Paz, designated as historic cultural monument number 276.

Additionally, the subject building is significant to the cultural identity of the San Vicente Commercial Corridor. As a well-recognized gathering spot and local landmark, the subject building's relationship between its commercial identity and its unique architectural design have contributed greatly to the growth and development of San Vicente Boulevard as a vibrant commercial corridor.

To reiterate the purpose of today's hearing, the Department of Building and Safety has requested that the Commission give its recommendation on the adequacy of the Environmental Impact Report's analysis as it relates to historical impacts to the Barry Building.

With regards to the EIR for the proposed demolition project, staff's recommendation is that the Commission recommend to Building and Safety that the EIR was prepared in compliance with the California Environmental Quality Act, and that the Commission recommend to the Department of Building and Safety that the EIR be certified.

Further, the Department of Building and Safety requested the Commission to advise on whether Building and Safety should adopt a Statement of Overriding Considerations. Staff recommends that the benefits of the project as drafted by the property owner are not supported with substantial evidence, and none of the considerations individually outweigh the significant environmental impacts of the demolition of the Barry Building. Therefore, staff's recommendation is that the Commission recommend the Department of Building and Safety not adopt the Statement of Overriding Considerations.

This concludes my presentation. My colleague Mindy and I are here to answer any questions that you may have. Thank you.

COMMISSION PRESIDENT MILOFSKY: Thank you, Melissa. Thank you, Mindy. Commissioners, any questions? Commissioner Kanner?

COMMISSIONER KANNER: This is a question with planning and the EIR process, in making the potential EIR public and seeking public comment. How is public comment sought? Is this through notices in the newspaper? Or through neighborhood council meetings? Or in what manner does the public get involved?

MS. NGUYEN: Mindy Nguyen with city planning. So any comments on the initial study would be published as part of the draft EIR. And then any comments in the draft EIR would be published and responded to line by line in the final EIR. So that is up to the completion of the final EIR.

COMMISSIONER KANNER: Right. Right. But the public is made aware of this draft EIR through what kind of notification?

MS. NGUYEN: So all -- anybody who -- any tenant, occupant, or property owner within a 500 foot radius would be notified of the availability of these documents. And they're also posted on our website. And then we also have an interested parties list. So if someone has indicated that they are interested in this project, they should also receive a notice as well, even if they're outside of that 500 foot radius.

COMMISSIONER KANNER: Okay. And through the city process, is that -- is notification given to the

council office?

MS. NGUYEN: I actually need to double check on that. But I believe -- I believe so. But they've been in -- they've been interested in this project. So I think as a result of that, they most likely happen. But I can double check on that. I wasn't the original planner on this project, but I can verify.

COMMISSIONER KANNER: I'm just trying to determine how thorough the process is.

KEN: No. Thank you, Commissioner Kanner. I mean typically the council office would not be commenting on the EIR, but it is notified of the availability of the draft EIR and the final EIR. And as was indicated, the council office has been involved in monitoring this case as it's been going through the EIR process.

I want to just, while I have the mic for a moment, I just wanted to reinforce one point before we go to further questions and the applicant's presentation. You know, this is a very unusual case coming to the Commission, very different from the types of considerations of historic cultural monument nominations that are kind of the bread and butter of most of your agendas, and the fact that you're being asked to weigh in on questions related to CEQA in a very detailed way.

So I just wanted to clarify in case I think Melissa did a good job of indicating this, but just so you're clear and the public is clear, that the narrow focus today is this request from the Department of Building and Safety to have the Commission provide its recommendation back to LADBS about the EIR, on the two questions of should the EIR be certified first, and then secondly should a Statement of Overriding Considerations, is a Statement of Overriding Considerations justified.

And to clarify again for your benefit and for the public who are listening today, the Commission is therefore not acting upon an actual demolition permit. The Commission of course under the cultural heritage ordinance does have the authority to object or not object to a demolition permit. And if the -- at a future date, if the demolition proposal proceeds, a demolition permit may be referred to our office, and we'd refer that to the Commission for your consideration. The Commission would have the authority to object or not object under the ordinance's provisions for a time limited period.

But that is not before you today. So that could come back at a future date. Your purview today is really limited to these recommendations on CEQA.

COMMISSION PRESIDENT MILOFSKY: Thank you, Ken. Commissioners, any other questions? Thank you, Melissa. Thank you, Mindy.

MS. NGUYEN: Thank you. Mindy Nguyen with city planning. I just wanted to confirm that the council district is in fact part of the agency list that we send notification to for all three components of the EIR.

COMMISSION PRESIDENT MILOFSKY: Thank you. I believe the applicant probably also wants to speak today. And give you equal time. I think you've got 20 minutes.

MS. BRISKI: Commission President Milofsky, if I could make a quick announcement while the applicant sets up. I'm going to make a quick announcement for those, in case anyone's trying to join us over council phone, I'm going to switch to the council phone line just to give them the call in information over Zoom.

COMMISSION PRESIDENT MILOFSKY: Thank you.

MS. BRISKI: So if you are joining us on council phone, please note that call in participation for today's CHC meeting is being offered over Zoom. You can listen to the meeting by calling 213-338-8477 or 669-900-9128. Today's Zoom meeting ID is 897 1578 3204. And the meeting passcode is 531988. We'll now be

switching back to the Zoom line where you can use that phone number to listen to today's meeting. Thank you.

COMMISSION PRESIDENT MILOFSKY: Ari, please put 20 minutes on the clock.

MS. BRISKI: Ari Briski, for the record, 20 minutes on the clock.

MR. CASEY: Good morning, Commissioners. My name is Ed Casey and I'm representing the applicant and the property owner. And I'm joined also today by Aaron Green from Afriat Consulting. Thank you for taking the time to consider this matter. It's been long in the making. As Planning told you, the EIR itself has taken over three years. So we do appreciate you taking the time.

I'm going to focus on -- I'm going to focus mostly on my remarks on the issue of the Statement of Overriding Considerations, the SOC. We obviously agree with your staff's recommendation that you recommend to Building and Safety to certify the EIR. Planning Department prepared it. It's quite comprehensive. And I note also that includes a range of alternatives that Planning developed in conjunction with OHR staff. So we do agree with that part of the recommendation.

On the first slide I also want to note that this is talking about compliance with the soft story

ordinance. And that ordinance expressly applies to historic buildings at Section 91.9308 [inaudible]. So before I get into some of the SOC issues, just a few issues about background. The parcel that the Barry Building is located on is only about two thirds of an acre. And I point that out just because there's nothing else you can really build on it in addition to the Barry Building without building extensive subterranean parking.

And you saw the slide also that staff put up, that says that the same property owner is the surrounding lots. Not quite accurate. I don't want to spend a lot about it. But if you look at Appendix C in the EIR, the actual ownership of those lots, quite different entities as detailed.

So I also want to correct some of the facts concerning the -- my client's vacating the building back in 2016. In 2015, he received a notice saying that the building was subject to the soft story ordinance. And we actually provided copies of that letter to the Commission in our supplemental presentation. And that, knowing what the structural integrity was of the building based on going through, that's the Hollow Square project, the client knew that the building was not going to be able to withstand a

moderate to severe earthquake.

So in 2016, he started to send out letters to the tenants saying it's time to vacate given that health risk. And that letter is also in your packet. I believe it's Exhibit P. And since that time, in terms of maintenance of the property, you may hear people say that the property hasn't been maintained, the -- my client has regularly maintained through property management company, maintaining the building the best they can. And that's also confirmed in a letter at Exhibit O to the EIR.

And I'm going to make these references to the EIR because staff talked about there needs to be substantial evidence to support an SOC. And they're absolutely right. I'm demonstrating to you that not only is there substantial evidence to support this, it's the only evidence.

So let me go right to seismic safety, make a couple points here addressing some of the issues raised by staff. The first one was staff says, well the building has withstood a number of prior seismic earthquake events. True. But that is not justification to not comply with the soft story ordinance. There's no exception in the ordinance for buildings that have withstood prior earthquake events. None.

Matter of fact, the ordinance was adopted in response to those prior earthquake events to make sure that buildings that have seismic concerns are retrofitted or demolished. And we don't have to wonder whether the next event there'll be such a seismic event that that building would be destroyed and people hurt. So that's that point.

The next point was staff said the demolition may not be necessary because the soft story ordinance only applies to the south wing. Now that's technically true. But the structural expert, a company called Englekirk, and Mr. Volnyy from Englekirk is here if you have any questions. Englekirk submitted a number of technical reports that the Planning Department adopted into the EIR. They approved these structural reports. And you can -- I gave you the numbers up there on the screen, the Exhibits G and H3, Appendix I.

And one things those reports say, not just looking -- focused just on the south wing, but if you look at the -- all the wings. I know this is small print. Sorry. But again, this is from Exhibit G in the EIR, you will see that the only structural expert who looked at this building and evaluated it, said that the other wings are dramatically over stressed, up to

650 percent over stressed. Another wing was 400 percent over stressed.

So as he's going to say also, another report on the structural expert in the EIR, in the Planning Department's EIR, says -- and I'm going to read this because I know it's small up on the screen there, quote, it is our professional opinion that even with the implementation of the soft story ordinance structural retrofit, the remaining building wings will not be structurally retrofitted -- and here's the important point -- and will not be sufficient to protect building occupants if the building was subject to a moderate to severe seismic event in the LA basin. That's the opinion of the structural expert whose report were adopted into the EIR. And there's no opinion of any other structural expert to the contrary.

Now that also talked about the other HCMs. I believe there were three that had to be -- also had to comply with the soft story ordinance. And staff is correct, when we looked up the building and safety records for those three other buildings, they have complied. But there's a big difference between the seismic safety of those buildings and what those buildings needed to be retrofitted and made safe, and

the extent of the over stress in the Barry Building.

And again, I gave you in Exhibit C, that supplemental package to you all, a letter from the same structural expert, who looked at those other building and safety records and said, it's almost like night and day. Those three other HCMs had very discrete issues that had to be addressed, an extra shoring wall for example. But nothing, nothing like the extent of the seismic work that would have to be done on the Barry Building to make it safe. Again, that's Exhibit C. And copies of those records from the building and safety on the other three HCMs also use supplemental package Exhibits D through G.

And let's talk about cost. Again, the evidence. We submitted as you know in our letter, detailed cost reports from reputable companies, looking at the cost of making these retrofit and all the other things that have to go with it. Even if you say, as staff said you don't have to do strict compliance for ADA, even if you shave off that little amount, you're looking at about 12 to 15 million dollars for a 12,000 square foot building. That's economically infeasible. Because if you had to spend that money, you would end up with a negative value in this property. And that's also documented by expert in the field. And there's no

opinion to the contrary. You'd have a negative value even if you said I don't want to comply with the ADA.

And staff also said, well you also don't have to comply with 100 percent of the building code. You can do under the California Historic Building Code, something less, 75 percent. Englekirk, Mr. Volnyy, Exhibit I to your final EIR, looked at that very issue and said, even with that lower standard, that 75 percent, it would still cost that amount. Because you'd still need the same amount of retrofit because it is that over stressed, up to 650 percent over stressed.

So what's the evidence? The substantial evidence here is that the amount of work to make this building safe in a moderate to severe earthquake is substantial, it will cost a lot, to a point where if the cost had to be incurred, there's a negative value in the property. So for that reason alone, to make safety -- seismic safety alone, would justify an SOC. But there are some other issues in terms of the neighborhood issues, in terms of the vacant lot. I'm going to let others talk about that. But I do point out that the specific plan for this area requires landscape buffering. That was addressed in the Planning Department's EIR in response to Comment B19.

So at this point I'm going to turn it over to Mr. Green to address some community issues.

MR. GREEN: Good morning, Commissioners. Aaron Green, president of the Afriat Consulting Group. I'd like to actually pick up where Commissioner Kanner was asking some questions about community engagement. So my firm was retained to go above and beyond what are the minimum requirements in CEQA to conduct some community engagement work. And we've been doing that work over the last two years. And we've done that in a very robust manner.

So we have a -- we hired a team that went door to door, knocking on individual neighbors' homes, both above and below San Vicente Boulevard. We sent mailers out to the community. We conducted hundreds of live in-person phone calls with real people, reaching out, notifying them of the proposal for the building demolition, and soliciting their feedback.

We worked with businesses along San Vicente Boulevard, including the burgeoning San Vicente -- Brentwood San Vicente Chamber of Commerce. And we spent very significant amounts of time with residents on Saltair Terrace cul de sac, where all of those who are willing to spend time and work with us in engaging conversations. And we built those relationships over

the last several years.

Lastly, in response to community request, we vol-- our client voluntarily extended the comment period in the EIR, from the standard 45 days to two months. What we heard in the vast majority of cases, time and again, was that residents did not want to see this building continue to sit there on San Vicente Boulevard. And you'll see that in the comment letters to the DEIR that are in the record.

And if you look at the letters and who the senders are, those are people who live in this neighborhood. Those are people who live 100, or 300, or 500 feet from the site. The people who are actually impacted by this property are the ones that are commenting on it. What we heard from them and what you'll see in those letters, is that they want this building removed because they believe there is a significant benefit to doing so. As I've mentioned and as the community told us, they believe it's a seismic safety hazard. They believe it is an impediment to reimagining this stretch of San Vicente Boulevard, and having a future property owner provide a new project and a new vision.

In addition, there are concerns and -- about public safety. Just last month, despite the fact that

the property is double fenced, it has security cameras, it was broken into, it was vandalized, for copper wiring and copper piping. And so our client and members of the community that we spoke with feel very strongly about this.

I want to note that our client is not insensitive to the fact that this is an HCM. And in working with the council office, we have proposed a voluntary covenant that will reside on this property if the -- if the demolition is granted. And what that covenant will require is the safe removal and storage of the two marquee curvilinear staircases that are in the lobby, along with the benches. Sorry, curvilinear is not the right term, but curved staircases in the courtyard of the building. And that those would then be required to be incorporated into a future project at the site.

So we have done extensive work with the community. And we have done -- our client has done what we feel everything we can to go above and beyond these minimum requirements for finding not only benefit, but community engagement, and opportunities for the community in the future to experience some of what has been here at the site.

And I'm going to ask Ed to make some closing

comments.

MR. CASEY: Again, we appreciate your taking the time to consider this matter. As Aaron side, our client has gone through many years of effort to try to do the right thing here. And I won't repeat a number of the benefits of proceeding with demolition that Aaron mentioned. But I want to emphasize that under CEQA any one benefit, just takes one benefit, to override the significant impact to historical resources [inaudible]

To me, that benefit again is protecting human health and safety during an earthquake event, a moderate earthquake event. That was the concern, the public safety concern that led the city to adopt the soft story ordinance in the very first place. And here, to make that benefit a reality, it would take so much money, that you create a negative value on the property. From a legal perspective, that is why the ordinance has to give the property owner the right to demolish. Because no one can be forced to incur costs to a point where they have -- it makes a negative value on their property.

So recognizing that right, and the health and safety concerns, in my opinion is more than enough to justify the adoption of an SOC. Again, thank you for

your considering this matter.

COMMISSION PRESIDENT MILOFSKY: Thank you. Commissioners, any questions?

COMMISSIONER BARRON: Hi, Richard Barron. I'm an architect. And during my practice I retrofitted at least three buildings similar to this. This is a two story wood frame building. It's not complicated. It's relatively easy to put in some sheer walls, put in a steel frame, and there you go.

So I don't know where you're getting all your information. I think your sort of overkill in terms of the dramatics of it. But my experience has been that this is not a difficult building to retrofit. It's rather easy. We're not talking about an unreinforced masonry building. We're talking about a wood stud and stucco box. It's extremely easy to retrofit.

And I think Mr. Milosic [sic] can also comment on some of the work that he's done because he is also an architect. And I'm sure he's retrofitted several buildings similar to this.

COMMISSION PRESIDENT MILOFSKY: But I think my first response when you discuss the extent of seismic work required was to turn to Richard and go, it's just some sheer walls. So you have -- and you have four minutes left. If someone from Englekirk would like to

explain how you can justify $12 million worth of work.

MR. CASEY: I can have Mr. Volnyy describe the --

COMMISSION PRESIDENT MILOFSKY: We got some time left, so let's --

MR. CASEY: He can describe the amount of seismic work needed.

COMMISSION PRESIDENT MILOFSKY: Yeah.

MR. VOLNYY: Name is Vladimir Volnyy. I'm a structural engineer.

COMMISSION PRESIDENT MILOFSKY: Can you speak into the microphone, please?

MR. VOLNYY: My name is Vladimir Volnyy. I'm a structural engineer from Englekirk. I did perform a study on this building. And we did determine that, yes, you're right, you need to sheer wall [inaudible]. The cost right now, construction cost, everyone knows is skyrocketing [inaudible].

Again, I'm structural engineer. Hard for me to judge on the costs. I only can comment what's required to be retrofitted. But it -- what I see on dozens of projects in the current market, it is significant cost to retrofit the building, wood buildings, and new buildings, concrete buildings, right? It just cost to add the sheer walls and steel moment frames, it's tremendous right now.

COMMISSION PRESIDENT MILOFSKY: I see you're saying it's based -- your thought is based on current costs.

MR. VOLNYY: Current costs --

COMMISSION PRESIDENT MILOFSKY: And had this work been done 10 years ago when the owner made the decision to vacate the building, it would have been substantially cheaper?

MR. VOLNYY: I don't -- I don't [inaudible] substantially cheaper. Again, 10 years ago is not -- it was not cheap either.

COMMISSION PRESIDENT MILOFSKY: Other questions, Commissioners? Thank you.

FEMALE: I have a question for the engineer, sir. Where is your company headquartered?

MR. VOLNYY: Downtown LA.

FEMALE: You're in LA.

MR. VOLNYY: Yeah. 888 Fig. Figueroa.

FEMALE: Very good. Thank you.

MR. VOLNYY: Yeah. Down the street.

COMMISSION PRESIDENT MILOFSKY: Thank you. All right. I see that we have a number of speakers in the room. What I'd like to do, because I think this may take -- since we have a number of speakers in the room, and I assume there are a number of hands that

will be raised, I'd like to take a five minute break before we take public comment.

We have several speakers in the room who'd like to address the Commission. You'll have one minute each. When I call your name, there are, what, three position, three microphones. Please come up to the table so we can sort of work efficiently. Jessica Sanchez, Andrew Salamian [sp], and William Babbit [sp]. And please give your name before you begin your comments.

MS. SANCHEZ: Hi, I'm Jessica Sanchez. And I'm here today to advocate for no demolition of the Barry Building because the Barry Building is a great example of neglect by demolition. And it's an issue that's occurring all over the city. And obviously being a historical cultural monument does not make a building immune, and but does not mean it should be demolished and swept under the rug.

There are other issues with other buildings in the city. And to allow to approve the EIR and allow demolition of the Barry Building would pave the way for demolition of other historical cultural monuments that are buildings such as possibly the Marilyn Monroe house. And other historical buildings could be demolished because the developers feel that there is a

better plan in having a vacant lot or something of that nature. And that doesn't have anything to do with neglect.

So I believe the Barry Building should be saved as an example of how we preserve historical cultural monuments and not tear them down. Because this is a city built on culture. And that does not necessarily mean money is [inaudible]. Thank you.

COMMISSION PRESIDENT MILOFSKY: Can you give your name, please?

MS. SANCHEZ: Jessica Sanchez.

MR. BABBIT: Good morning. My name is Bill Babbit. Thank you for this opportunity. I'm a Brentwood resident, so I've had a presence in Brentwood for 30 years. I'm a board of directors of the Brentwood Homeowners Association, but I'm speaking as an individual. I'm a retired licensed architect. I have a Bachelor of Fine Arts and Architecture from the Rhode Island School of Design, as well as an MBA in Finance from Columbia University.

To say I'm very pro-building, with a nod to a famous chant, now build baby build, but not at the expense of our architectural landlords and not at the expense of significant architecture in our community. Having lived in Brentwood for a long time, until it

was shut down, I would often go to the Barry Building, Dutton's, and the coffee shop. But I would linger and enjoy the building and its architectural design, with its nod to classic architecture. I'd bring friends who are architects to see the building.

Clearly this is a very valuable piece of land. But also it's a landmark and significantly architecturally significant, in the middle of Brentwood's main street. Respecting and saving this building, this landmark --

COMMISSION PRESIDENT MILOFSKY: Finish your sentence.

MR. BABBIT: Respecting and saving this building will say something about Brentwood and the community, will remain a wonderful place to workshop, visit, and enjoy, remain a treasure, and a potential jewel in the crown for downtown Brentwood. Thank you very much.

COMMISSION PRESIDENT MILOFSKY: Thank you.

MR. SALAMIAN: Good morning. Andrew Salamian, representing the LA Conservancy. I just want to applaud staff on a really great presentation and report. I don't think this is a difficult decision. I think they made a very strong argument against demolition. You have very narrow findings to make, which every way I look at it, there's no way you can

make the findings that the benefits of demolition outweigh the significant unavoidable impacts, and that there's no feasible alternative.

The EIR gives four alternatives and they're all feasible in our view. We do think this would set a bad precedent of a developer who doesn't like the alternatives, you know, lets the building go into neglect, and then asks for a demolition permit. The gaslighting, I will say, on the costs of retrofit is kind of crazy because you can see there's a full TI included in that estimate. So I do just want to ask you to send a strong signal to LADBS. Thank you.

COMMISSION PRESIDENT MILOFSKY: Thank you. Okay. Robert Blue and Ziggy Krause, please.

MS. KRAUSE: As mentioned before, we have submitted substantial rebuttals since November 2023 [inaudible] after the EIR was published. Our rebuttals pointed out various sections in the EIR that were flawed, including one that we addressed from the Historic Resources Group analysis in which they stated that there's no connection between the Barry Building, David Barry, and the coral trees. In fact, we submitted with our rebuttal a article from the LA Times that clearly stated [inaudible] --

It had basically a statement that says, the most

indisputable [inaudible] beautiful projects on San Vicente in Brentwood. That was something that Mrs. Knudsen started way back, and Mr. Barry's project was to plant coral trees. He was the project manager. So there's one connection. In fact, there was a photograph included in our submissions from 1949 showing David Barry, Jr., holding a shovel as he and others planted one of the many coral trees on San Vicente.

All that information was not presented to you. So that was one of the many rebuttals we had, but I thank you for your time.

COMMISSION PRESIDENT MILOFSKY: Thank you. Thank you.

MR. BLUE: Good morning. First of all, the --

COMMISSION PRESIDENT MILOFSKY: Name, please?

MR. BLUE: Robert Blue. It is not a nuisance property. In the last 13 years there's only been one police report according to LAPD West LA Division senior lead officer Matthew Kirk. And that's shown on the second page of our submittal.

The economic analysis is flawed. It failed to look at the minimum cost estimate to bring the building into compliance with the soft story ordinance. The estimate was padded with -- including a

discussion of ADA compliance for restrooms. The issue as an example could be addressed by repurposing the ground floor restroom as a gender neutral restroom, which is normally done.

The report failed to address any of the grandfathering in permit requirements based on the year the building was built. All the money spent on consulting services and fees for this stretched out CEQA process could have been applied to offset the minimum cost to build the building into compliance.

The applicant has stated their intent to sell. In the staff report it says that. And the buyer of the building could -- which would be sold with the bundling surrounding properties, could present a project that incorporates a restored Barry Building into a new project that serves the community and will be an economic benefit for the city.

COMMISSION PRESIDENT MILOFSKY: Thank you. And I assume there's hands raised.

MS. SIMPSON: Tiana Simpson, for the record. We do have callers at this time. Toby, you are now able to speak. Please --

MS. BRISKI: Hang on. Ari Briski, for the record. Pardon the interruption. It seems like we do have another individual who was hoping to speak in person.

Have you submitted a speaker card? Okay. Please allow us a moment to sort through here.

COMMISSION PRESIDENT MILOFSKY: Yes. We do have one more person here. Lauren Cole [sp]?

MS. COLE: Before I start, I had -- I'm here representing the South Brentwood Residents Association. And I had asked for two minutes. Brentwood doesn't have a certified neighborhood council. And I was told because we're not certified, I can't have two minutes. But I've come all the way downtown representing our neighborhood group. Is it possible to get two minutes?

COMMISSION PRESIDENT MILOFSKY: No.

MS. COLE: Okay. Be quick then. Lauren Cole, president of South Brentwood Residents Association. We're the neighborhood group that's been around for approximately 50 years, that represents South Brentwood from San Vicente to Wilshire, and all multifamily buildings in Brentwood.

South Brentwood is a walkable community. And we're the group that represents everyone who lives within walking distance of San Vicente. People live in the area because it's walkable. And we have amenities along most of San Vicente. SBRA is strongly in support of demolishing this building. This building has been a

blight on our community for about 15 years now, even prior to the Green Hollow Square project that was a tired property. We were supportive of building a more neighborhood facing and economically viable project there.

As you've heard, the building is not seismically sound. We've also heard about it's not ADA compliant. For the last 15, 20 years, it's been vandalized. We have a big safety concern that unhoused individuals will start a fire that will spread to other buildings. And can I also -- sorry, one more point.

Even when the request was made 20 years ago that the building become historically cultural, it wasn't because of the building. Neighborhood residents had what turned out to be a misguided thought that it would save the independent books- -- which closed in 2008. So even before Green Hollow Square --

COMMISSION PRESIDENT MILOFSKY: Thank you.

MS. COLE: Thank you very much.

COMMISSION PRESIDENT MILOFSKY: Tiana?

MS. SIMPSON: Tiana Simpson, for the record. Toby, you are now able to speak. Please press unmute.

MR. MURESIANU: Hi. My name is Toby Muresianu. I am a volunteer with Westside for Everyone and a former board member of the South Brentwood Residents

Association. I also support demolishing this building. I think there is an overriding concern here.

Namely there's a school nearby that's at 30 percent of capacity, the Brentwood Science Magnet Elementary School. And it fits the pattern of all over LA, schools have declining enrollment because families can't afford to live there. I myself no longer live in the area because there were no family sized apartments available once I had children. So I had to move.

But while I lived there, I used to give people tours of Brentwood. And I would point out that when they were standing in front of the Barry Building, it was a cultural landmark. And they would laugh because it's ridiculous. It's a small, frankly ugly building. And there's a thousand others that look like it in LA.

If there's an architectural significance to it, the right way to preserve it is in a book or a website for people who are interested in that sort of thing, where they can see it as it was in its heyday, not as it is now.

MS. SIMPSON: Okay. Tiana Simpson, for the record. Next caller, Wendy, you're now able to speak. Please press unmute.

MS. ROSEN: Hi, can you hear me?

MS. SIMPSON: Yes.

MS. ROSEN: Great. My name is Wendy Rosen. And I actually was chair of the Brentwood Community Council when this building was designated. There was overwhelming support to designate this building, not for the reasons that Lauren Cole just suggested, but because this was a very beautiful and rare example of midcentury modern architecture.

This is a very rare example in a business district. This is an absolutely stunning building. Unfortunately the owner has let it go to neglect. And they have done that so that they can bypass CEQA requirements to actually bring a -- an alternative project that would be viable. And they can sell it for more money with no encumbrance of CEQA review required.

I ask that you support the request to not allow the demolition of this incredible building and preserve historic resources, and set a precedent showing that the city does value its historic jewels. Thank you.

MS. SIMPSON: Next caller, Jean Frost. You are now able to speak. Please press unmute.

MS. FROST: Jean Frost. I am here representing the West Adams Heritage Association. I strongly support the staff report that urges you not to adopt a

Statement of Overriding Considerations. It certainly is not justified by the facts. And it would set a very negative precedent for historic cultural monuments and the bar with which a Statement of Overriding Considerations could be adopted.

This is a really significant act. And the facts do not support such adoption. I also support the comments regarding the trees, done by HRG. West Adams Heritage has dozens of cultural monuments. And taking such a step, which is due to really the neglect of the owner and [inaudible] hardship, the Statement of Overriding Considerations ought not to be adopted. Thank you.

MS. SIMPSON: Caroline, you are now able to speak. Please press unmute.

MS. JORDAN: Hello. Thank you. My name's Caroline Jordan. I chair the Brentwood Community Council, but I'm here today speaking just as an individual. It is time to put this building out of its misery. It has -- it is and has been for quite some time nothing more than an attractive nuisance. It is time to be able to activate this area of San Vicente and bring life back to our small commercial corridor.

I ask this Commission to allow for the overriding circumstances and let the applicant move forward with

getting something better in this area for the community. This building is a duplicate of one that the architect had built in Hawaii. And it has already been demolished without any of this hoopla in Hawaii. It was not recognized as significant or important. Thank you.

MS. SIMPSON: Jake, you are now able to speak. Please unmute yourself.

MR. PIERCE: Hello. Yes. My name is Jake Pierce, field organizer for Abundant Housing LA, speaking in support of the demolition. Structural -- the building is unfit. Structural experts and the city of Los Angeles have determined that the Barry Building is structurally unfit and likely to suffer severe damage in an earthquake.

I mean, can you imagine what would happen if there were an earthquake and it collapsed and hurt somebody? There was a comment from staff that we should take it as a sign this building is structurally sound, that it has withstood previous earthquakes. If that's part of the reasoning, I don't know why we have, you know, structural standards in the first place and a retrofit program. You know, the fact is we're due for a much bigger earthquake than anything we experienced in the '70s or '80s.

I also think that this is an opportunity to imagine something that would be much better for the community, that would make it more walkable and more affordable. Thank you so much.

MS. SIMPSON: Next caller, Michael Freeman. You are now able to speak. Please unmute yourself.

MR. FREEMAN: Hi there. My name is Michael Freeman. I'm currently a renter in Brentwood and have lived there and rented there for over 12 years. And I want to voice my support for the demolition of the Barry Building. I value history and I value monuments. But this is absurd.

In the 12 and a half years I've lived in Brentwood, I saw a coffee shop a little over eight years ago, I think. And for the last many years it's been in disrepair. Not a single person I know in the neighborhood or anybody I've been on walks with has ever commented on the architectural value of the place or mentioned Dutton's Brentwood Bookstore. We're talking about preserving a building for a bookstore that no longer exists.

And all of this would not be that big of a deal if we weren't in the middle of a housing crisis. We are tired of having developments like this be derailed due to these very thin reasons like cultural heritage.

This building is not something that any of us have heard of. I urge you -- I urge you to allow development. Thank you.

MS. SIMPSON: Next caller, Liam, you are now able to speak. Please unmute yourself.

MR. LIAM: Hey everyone. I'm Liam. I've lived on the westside for four years now. And I also am going to disagree with the staff. I think that the overriding considerations here are very obvious that demolition is the correct course of action here. The alternatives presented by staff aren't realistic. The actual alternative to demolition is the status quo.

The -- this building remains vacant. And San Vicente has a building in disrepair, instead of commercial properties or apartments that are actually going to be used. A building that is going to be more environmentally friendly could be built. A building that is more accessible to disabled and elderly people could be built. And that's the -- the alternative that -- that, you know, I'm imagining for San Vicente, and the westside, and CD11. Thank you.

MS. SIMPSON: Next caller, Steven. You are now able to speak. Please unmute yourself.

MR. LUFTMAN: Hello. Steven Luftman [sp] speaking against demolition. The Barry Building made an

impressive contribution to Los Angeles' leadership in postwar modern architecture, made all the more important considering the building's architect, Milton Caughey, a graduate of the prestigious Yale School of Architecture, died at only 46.

It would be a grave injustice of Los Angeles architectural history to reward the current owner's own neglect by issuing a Statement of Overriding Consideration. The building was once a center of cultural activity on the westside of the city. Rejecting this outrageous request is the first step in returning the Barry Building to its vibrant future. Thank you.

MS. SIMPSON: Next caller, Bruce. You are now able to speak. Please unmute yourself.

MR. POMP: Hello. My name is Bruce Pomp [sp]. And I live on Saltair Terrace, directly north and behind the Barry property. I also studied architecture and town planning at Yale. And I strongly urge the demolition of this building.

My takeaway from what I've heard at this hearing, is retaining the Barry Building as a historical property is not feasible or economic. The current situation of having this building remaining unoccupied, which is the status quo, is unacceptable.

And it's a danger to the neighborhood. It's been an eyesore. I've seen vagrants enter the property even though it's double fenced. There's been graffiti and broken windows.

A vacant lot would be much safer and open the project to future development. And I love the idea of incorporating the architectural elements of the Barry Building, which would pay homage to this historical site. So again, I strongly urge the demolition.

MS. SIMPSON: Next caller, Pamela Brown. You are now able to speak. Please unmute yourself.

MS. BROWN: Hi. Pamela Brown, Brentwood Community Council board member, but here speaking as an individual who has lived two blocks from the Barry Building for 30 years. I was in support of it being demolished and developed with a nice mixed use building back in 2008 and 2009. It has done nothing but fall into disrepair.

Please allow the demolition. I pass by it at least twice a day. I -- I'm a realtor who, when people move into the area, they question what is up with that building. And when I say it was designated historical because there was Dutton's Books, nobody knows what that is except for people who have been here decades long.

So you know, future development is necessary and important. And the city needs to support the demolition, so that mixed use and housing can be created, and the site can look beautiful once again.

MS. SIMPSON: Next caller, caller ending in 3713. You are now able to speak. Please unmute yourself.

MS. RUTH: Hi. This is Ruth. I'm an unhoused person living in the city of LA in public. And I just am so tired of seeing all these beautiful buildings fall into disrepair when they can be occupied and held vacant. All these beautiful buildings are held vacant, when people could be living or -- or working in them and restoring them.

And I want to see this building not fenced off, not vacant, not falling into disrepair. But I want to see people restore it, and occupy it, and use it. Thank you.

MS. SIMPSON: Next caller, caller ending in 5540. You are now able to speak. Please unmute yourself.

MR. HANES: Good morning. My name is Doug Hanes. I ask that this Commission not recommend certification of the EIR despite the very thorough staff report. CEQA requires a finite project description main- -- and maintain a vacant dirt lot in one of the most expensive locations in the United States is not what I

would call a plausible project, particularly in light of a prior application to develop the site that was submitted by the owner and then taken out.

Without a realistic project description, an accurate alternatives analysis cannot be determined that would incorporate the Barry Building. The EIR is therefore fatally flawed and should be rejected. And I'm going to point out the obvious, which I'm sure all the members of the Commission are aware of because I hear this all the time. All the arguments being made by the applicant's representative can be made for any project, where the owner doesn't want the historic status.

And I'm reminded of the Cinerama Dome. I heard all these arguments before. None of them were plausible. And instead all they did is undermine the process that we have in order to keep this [inaudible] --

MS. SIMPSON: Time.

MR. HANES: -- wonderful city. Thank you.

MS. SIMPSON: Next caller, Chris B. You are now able to speak. Please unmute yourself.

MR. BELL: Hello My name is Chris Bell. I live down the street from the Barry Building and work for a nearby property owner. I'm speaking in strong demoli-

-- strong support of demolition. I walk past this building almost daily. The building is obsolete and extremely unsightly. It has become a nuisance to the local residents and the San Vicente businesses.

This building has been a blight on the community for many years. The applicant should be allowed to proceed with demolition. Thank you.

MS. SIMPSON: Next caller, Matt. You are now able to speak. Please unmute yourself.

MR. MATT: Hi. I've lived in the Brentwood community for 25 years. Really the only good thing about the Barry Building was Dutton's. And Dutton's is long gone. The idea that this is just a part of some cultural heritage is really -- I'm sorry, is just pedantic. It's been an eyesore for the last 15 years. It'll continue to be an eyesore if you don't demolish it.

So let's work together as a community to build something responsible, and useful, and hopefully beautify the -- the neighborhood. Thank you.

MS. SIMPSON: Tiana Simpson, for the record. That concludes our callers at this time.

COMMISSION PRESIDENT MILOFSKY: I believe the council office would like to make a statement.

MR. SILVA: Good morning. President Milofsky,

honorable Commissioners. My name is Sean Silva, speaking on behalf of the office of councilman Traci Park. Thank you allowing me to speak before you again today. I'm here to relay our office's support for the certification of the EIR and a recommendation to adopt a Statement of Overriding Consideration for the property known as the Barry Building.

As this Commission well knows, we are wholly invested in the work of preserving and protecting our city's eclectic trove of historic cultural resources. From the New Bethel Baptist Church, and the Arthur Lloyd Reese home in Venice, the Venice lifeguard tower, to the last home of Marilyn Monroe, we have been active and thoughtful stewards of our district's history.

We have considered the Barry Building site conditions and heard from the community as well. We have worked with the property owners to establish a preservation covenant that ensures the safeguarding of the site's iconic elements, including the staircases and benches. These elements are to be used in the site's future development, paying homage to the Barry Building.

We respectfully request that this Commission certify the EIR and recommend -- recommend

certification of the EIR and a support for a Statement of Overriding Considerations, to acknowledge the potential for this site to be transformed into something that better serves the community. Thank you for your time and consideration of the comments I've made here.

COMMISSION PRESIDENT MILOFSKY: Thank you. All right. Seeing no other public comment, hands raised, let's close public comment to this item. Commissioners? I've got a question for staff. In Melissa's presentation she noted several properties surrounding the Barry Building are owned by the -- under the same ownership. The owner's representative denied that. Can you elaborate on -- on that ownership?

MS. JONES: Yes. Melissa Jones, Office of Historic Resources, for the record. In response to that question, we looked in our zoning and information map access system, known as ZIMAS, which shows assessor records, looking at each of the individual parcels that I highlighted in my presentation that shows that they are under the same exact ownership as the Barry Building. That was verified.

COMMISSION PRESIDENT MILOFSKY: Okay. So the Barry Building really isn't a standalone parcel of 0.6

acres. It's part of a much larger assemblage of parcels.

MS. JONES: It's -- those are all separate parcels. They're not -- they're not part of the same parcel within the same APN number. They're different APN numbers. But they are all owned by the same entity that owns the Barry Building.

COMMISSION PRESIDENT MILOFSKY: But they -- they could be potentially lock tied into a single parcel and developed for housing, which some -- some people, some callers have mentioned --

MS. JONES: Yes. That's a possibility. That would be a separate action. But yes, that -- that could be potentially a possibility.

COMMISSION PRESIDENT MILOFSKY: And -- and possibly even subterranean parking could be accessed through one of those other parcels.

MS. JONES: That's -- that's true. Yes. And that, actually to confirm, so that footprint of the existing buildings that I showed on my presentation, it's actually the exact footprint of the previously proposed project, the Green Hollow Square project was on -- proposed for those same sites.

COMMISSION PRESIDENT MILOFSKY: Okay.

MS. JONES: To further emphasize that those were

-- are owned by the same property owner that owns the Barry Building.

COMMISSION PRESIDENT MILOFSKY: Okay.

MS. JONES: Thank you.

COMMISSION PRESIDENT MILOFSKY: I guess in part, I tend to agree with the 2009 Commission letter. I don't think anything has been stated today that sort of leads me to believe that there's overriding considerations on this. I think what I'm seeing an example of, which is a very bad precedent for the city to start looking at, is demolition by neglect.

If a lot of buildings sit vacant long enough and don't take care of it, it won't fall down on its own. Which in fact raised me -- led me to raise the question to staff when we had a -- a prior meeting, which is if demolition is caused by neglect, is that -- is that subject to the scorched earth policy. And the answer was no.

But I think it's something that the city might want to take a look at in terms of not encouraging properties to remain vacant, unmaintained, and a blight on their neighborhood, and therefore causing demolition. Richard?

COMMISSIONER BARRON: Yeah. The point I was going to bring it up too, demolition by neglect. Demolition

by neglect is a developer strategy that helps get neighborhoods supportive of the demolition because the building has gone to hell in a handbasket. And so now you have a lot of people calling the council office complaining about the neglected building.

As I said before, my office did several buildings like this in terms of adaptive reuse. And it's quite possible that this building could be brought back to its former glory. It's only been hurt by the -- by the demolition by neglect, which has only increased sort of the problems associated with rehabbing the building.

And so I'm supportive of the staff's proposal and -- and their thinking, that we should certify the -- the EIR and not deal with the overriding circumstances.

COMMISSION VICE PRESIDENT KENNARD: The arguments from the staff were persuasive for me. I'm very moved by the issue that Commissioner Barron just spoke about of demolition by neglect, request for demolition. I'm also a strong proponent of modernist architecture. And I believe that it's one of the fewest, as it was pointed out in the staff recommendation, commercial modernist buildings are not very common.

And we had this nomination. I was not on the

Commission when it was designated. But I would have supported that designation of this building as an example of modernist architecture. So I support both recommending -- approving the EIR and also against the demolition.

COMMISSION PRESIDENT MILOFSKY: Commissioner Buelna?

COMMISSIONER BUELNA: Yeah. I was interested to hear the community and they're split. But I'm going to be supportive of no demolition.

COMMISSION PRESIDENT MILOFSKY: Commissioner Kanner?

COMMISSIONER KANNER: Yeah. It's unfortunate that this, as a courtyard building, most of the architectural attributes are not seen by the public. What they see is the exterior, which evidently has been altered, some of the windows, the coverings of the windows, which added to its international style, have been removed. So what the public sees is an abandoned building with fences around it. And obviously that's not a welcome to my neighborhood type of a image, especially for upscale Brentwood.

But it's not the building that has allowed itself to deteriorate. It's the property owner. And I feel that we as a landmark board, we are the people that

have the expertise to understand what is significant and what isn't. And we are the -- I wouldn't say the last word, it obviously goes on to other, you know, city entities. But some of us are architects, some of us are historians. And we've looked at the report. The report, in case the public isn't aware, was about 288 pages long.

And I think it's very clear that the deep pockets property owner has kind of thumbed their nose -- noses -- nose or noses, at preservationists. And in the process has gained support from -- from the community, the Brentwood community, which would like to see something more attractive. And, you know, who knows what'll happen someday. But right now we have to -- I think we have to stay with the opinion that we made in 2007, and recognize that this is a historic structure that needs protection.

COMMISSION PRESIDENT MILOFSKY: Thank you. I'd also like to note that a vacant lot with a chain link fence is no -- no great contributor to the public environment. In fact, it's an attractive nuisance and will probably attract homeless tents in front of it. So I don't see that demolition is -- is remotely alternative in terms of improving the quality, the context of that neighborhood.

Commissioners, do I have motion on either item?

COMMISSIONER BARRON: Richard Barron. I'll move that we -- on the Barry Building, case number 2007-1585, at 11973 San Vicente Boulevard, that we certify the EIR and we not adopt the Statement of Overriding Considerations, and adopt the report findings.

COMMISSION PRESIDENT MILOFSKY: You want to make that into two motions?

COMMISSIONER BARRON: Hmm?

COMMISSION PRESIDENT MILOFSKY: You want to make that into two separate motions?

COMMISSIONER BARRON: Do we need two separate motions?

COMMISSION PRESIDENT MILOFSKY: Sure.

COMMISSIONER BARRON: He's saying no.

COMMISSION PRESIDENT MILOFSKY: Okay.

MALE: You don't. You might want to just clarify the language that you're recommending to the Department of Building and Safety that they certify the EIR. And -- and you're also recommending to the Department of Building and Safety that they not adopt a Statement of Overriding Considerations.

COMMISSION PRESIDENT MILOFSKY: Well said.

COMMISSIONER KANNER: Commissioner Kanner, I second.

COMMISSION PRESIDENT MILOFSKY: Okay. Ari?

MS. BRISKI: Commissioner Barron?

COMMISSIONER BARRON: Yes.

MS. BRISKI: Commissioner Kanner?

COMMISSIONER KANNER: Yes.

MS. BRISKI: Commissioner Buelna?

COMMISSIONER BUELNA: Yes.

MS. BRISKI: Commission Vice President Kennard?

COMMISSION VICE PRESIDENT KENNARD: Yes.

MS. BRISKI: Commission President Milofsky?

COMMISSION PRESIDENT MILOFSKY: Yes.

MS. BRISKI: The motion carries.

COMMISSION PRESIDENT MILOFSKY: Okay. Thank you. And next regular meeting of the Cultural Heritage Commission will be held Thursday, September 19th, 10:00 a.m., Los Angeles City Hall, Room 1010. And we are adjourned at 11:52.

I, Carlo Craig, a transcriber, hereby declare under penalty of perjury that to the best of my ability the above 66 pages contain a full, true and correct transcription of the audio recording that I received regarding the event listed on the caption on page 1.

I further declare that I have no interest in the event of the action.

July 2, 2025

Carlo Craig

X_____

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