



## Public Comments Not Uploaded Re: Council File 25-1518 — Appeal of Demolition Permit for the Barry Building (11973 San Vicente Boulevard)

1 message

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Tue, Feb 17, 2026 at 11:29 PM

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February 18, 2026

Planning and Land Use Management Committee

Los Angeles City Hall

200 N. Spring Street, Room 340

Los Angeles, CA 90012

Re: Council File No. 25-1518 – Appeal of Demolition Permit for the Barry Building ([11973 San Vicente Boulevard](#))

Dear Chair and Members of the Committee:

This letter follows my earlier correspondence and responds directly to the applicant's February 17, 2026 submission. Respectfully, that applicant letter rests on a fundamentally ill-founded premise: that the mere existence of numerous consultant reports and invocation of the "substantial evidence" standard resolves the City's obligations under CEQA.

It does not.

The issue before this Committee is not how many technical appendices appear in the record. It is whether the Environmental Impact Report satisfies CEQA's requirements for analytical completeness, transparency, and informed decision-making before authorizing the irreversible demolition of a designated historic resource.

The applicant's letter treats this appeal as though it were a traditional civil lawsuit in which the only question is whether some evidence exists somewhere in the record. But the adequacy of an EIR is a legal question. Courts have consistently held that an EIR must contain sufficient facts and analysis to permit meaningful public review — not merely conclusions supported by summarized expert opinion.

The Final EIR expressly acknowledges that demolition of the Barry Building — a recognized historic resource — would constitute a significant environmental impact. That admission triggers heightened scrutiny. Once a significant impact is acknowledged, the City must either adopt feasible mitigation measures or support a finding of infeasibility with rigorous and transparent analysis. Any Statement of Overriding Considerations must be grounded in identifiable public benefit.

Here, demolition is being advanced in the absence of an approved redevelopment plan. There is no adopted housing project, no civic facility, no defined development program tied to this action. The Committee is being asked to authorize permanent cultural loss based largely on escalating cost estimates and market feasibility modeling — without clarity as to what replaces the structure.

That sequencing is unusual and creates institutional risk.

The Soft Story Ordinance requires compliance. It does not mandate demolition. Retrofit is a lawful compliance pathway, and thousands of structures across Los Angeles have satisfied seismic requirements without being removed. The existence of structural deficiency establishes the need for action; it does not establish that demolition is the only viable option.

The economic infeasibility analysis cited in the record relies heavily on residual land value calculations and highest-and-best-use assumptions typical of private development modeling. CEQA, however, defines feasibility broadly to include economic, environmental, social, and technological factors. The inquiry is not whether preservation yields maximum redevelopment return; it is whether rehabilitation is reasonably achievable.

The record, as described, does not appear to fully evaluate preservation tools such as phased rehabilitation, historic incentives, adaptive reuse strategies, or alternative financing mechanisms that could materially affect feasibility conclusions. When mitigation is rejected as infeasible, that conclusion must withstand careful scrutiny.

Moreover, without a concrete replacement project, any overriding considerations analysis is materially weakened. CEQA balancing requires identifiable countervailing public benefit. Speculative future redevelopment is not equivalent to an approved and defined public program.

Demolition without replacement also sets precedent. It signals that a designated historic resource may be removed primarily on the basis of escalating cost projections, even absent a defined public purpose. That is a consequential policy posture.

This appeal is not anti-development. It is about sequencing, transparency, and institutional prudence.

When the loss is permanent, caution is governance.

At minimum, the Committee could:

- Remand for clarification of feasibility assumptions;
- Condition demolition approval upon an approved redevelopment plan; or
- Require updated analysis that fully evaluates preservation alternatives under CEQA's feasibility standard.

Those steps would protect the City, strengthen the administrative record, and demonstrate that historic resources are not discarded without clear and defined public purpose.

For these reasons, I respectfully urge the Committee to grant the appeal or remand the matter for further review.

Respectfully,

Gerald A. Bagg

