

To: Alston & Bird LLP

Attn: Greg Berlin, Senior Associate

From: John LoCascio, AIA, Principal Architect

Date: January 4, 2022

We were asked to comment on the findings of the “Barry Building Relocation Feasibility Report” prepared by James C. Wolf of HKA, dated December 22, 2021. The Barry Building is designated Los Angeles Historic-Cultural Monument (HCM) #887 and is therefore considered a presumptive historical resource as defined by the California Environmental Quality Act (CEQA).

The HKA report evaluates the feasibility of four options for relocating the Barry Building from its current (original) location at 11973 San Vicente Boulevard to a new, as-yet-undetermined, location: 1) moving the building intact; 2) moving the building in six, two-story segments; 3) moving the building in nine, one-story segments; and 4) moving the building in twenty, one-story segments. The report finds that options 1 and 2 are infeasible due to the size of the elements to be moved, which would present insurmountable obstacles in navigating public streets; while options 3 and 4 are technically feasible, but present high risk of damage and loss of the building’s historic materials and features.

We have reviewed the HKA report and concur with the findings that options 3 and 4, while technically feasible, present a high risk of damage and loss of the Barry Building’s character-defining features and thus could result in a significant adverse impact as defined by CEQA. In particular, the exterior cement plaster would almost certainly be completely lost. However, most exterior features including windows, doors, louvered screens, the courtyard staircases, and balcony railings, could be removed and catalogued prior to disassembly, stored securely during relocation, and reinstalled in their original configuration after the building is relocated.

Given the Barry Building’s size and configuration, disassembly for relocation is anticipated. While disassembly poses greater risk to historic features and materials, the risk could

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12 S. Fair Oaks Avenue, Suite 200, Pasadena, CA 91105-3816
Telephone 626 793 2400, Facsimile 626 793 2401
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potentially be mitigated to a level of less than significant impact. Mitigation measures could include, but not necessarily be limited to, the following:

- Historic American Buildings Survey (HABS) documentation including photographs, drawings, and narrative, completed prior to issuance of permits.
- Preparation of an Historic Structure Report (HSR) in conformance with Preservation Brief 43 prior to 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 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.

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