

## Appendix M

Letter Regarding Soft-Story Ordinance

# ALSTON & BIRD

333 South Hope Street, 16th Floor  
Los Angeles, CA 90071-1410  
213-576-1000 | Fax: 213-576-1100

Edward J. Casey

Direct Dial: +1 213 576 1005

Email: [ed.casey@alston.com](mailto:ed.casey@alston.com)

May 26, 2023

**VIA EMAIL**

James Harris  
Los Angeles Department of City Planning  
221 North Figueroa Street, Room 1350  
Los Angeles, CA 90012

Re: 11973 San Vicente Boulevard Project Environmental Case: ENV-2019-6645-EIR

Dear Mr. Harris:

On behalf of 11973 San Vicente, LLC (“Applicant”), I am sending this letter to respond to the comment letter submitted by Adrian Scott Fine, Senior Director of Advocacy for the Los Angeles Conservancy dated April 18, 2023 (the “Conservancy Letter”), regarding the 11973 San Vicente Boulevard Project Draft Environmental Impact Report (“DEIR”) published by the City of Los Angeles. My letter specifically addresses the comment concerning compliance with the City’s mandatory soft-story seismic retrofit ordinance.

We have reviewed a copy of the soft-story building inventory list provided by the Los Angeles Department of Building and Safety on May 12, 2023. (To request a copy of that list, I emailed [LADBS.custodianofrecords@lacity.org](mailto:LADBS.custodianofrecords@lacity.org).) We also obtained a copy of the latest monthly report prepared by the City showing compliance by those buildings with the soft story ordinance. (A copy of that report is provided at [https://www.ladbs.org/docs/default-source/publications/misc-publications/soft-story-compliance-report.pdf?sfvrsn=bbe9f553\\_146](https://www.ladbs.org/docs/default-source/publications/misc-publications/soft-story-compliance-report.pdf?sfvrsn=bbe9f553_146).) Based on the information in those lists, we determined that there are 12,440 buildings on the soft-story ordinance list.

We then compared to the list of those buildings that have been designated as historic cultural monuments (HCMs) under the City’s Cultural Heritage Ordinance. (A copy of the list of HCMs prepared by the City Planning Department is provided at [https://planning.lacity.org/odocument/24f6fce7-f73d-4bca-87bc-c77ed3fc5d4f/Historical\\_Cultural\\_Monuments\\_List.pdf](https://planning.lacity.org/odocument/24f6fce7-f73d-4bca-87bc-c77ed3fc5d4f/Historical_Cultural_Monuments_List.pdf).) In reviewing that list, there are 1,181 buildings that have been designated as HCMs. Out of those HCMs, only four are subject to the soft story ordinance, including the existing building at 11973 W. San Vicente Boulevard (the Barry Building). (638-642½ S. Kelton Avenue, 10919 W. Strathmore Drive

James Harris  
Los Angeles Department of City Planning  
May 26, 2023  
Page 2

and 1780 N. Griffith Park Boulevard.) Therefore, only (0.032%) of all the HCM buildings have been deemed subject to the soft story ordinance.

Very truly yours,

A handwritten signature in black ink, appearing to read 'K Hill', written in a cursive style.

Kathleen Hill

cc: Stacie Henderson (via email)  
EJC:kah