July 30, 2014

Submitted by email
Ms. Sarah Molina-Pearson
City of Los Angeles, Department of City Planning
200 N. Spring Street, Room 750
Los Angeles, CA 90012
Email: sarah.molina-pearson@lacity.org

RE: ICON Sherman Oaks (Sunkist Headquarters Building), Notice of Preparation (ENV-2014-1362-EIR)

Dear Ms. Molina-Pearson:

On behalf of the Los Angeles Conservancy, thank you for the opportunity to comment on the Notice of Preparation (NOP) of an environmental impact report for the ICON Sherman Oaks Project (Sunkist). The Conservancy is very encouraged that this project intends to retain and reinvest in the historic Sunkist Headquarters Building. It has served as an important architectural icon and landmark for Sherman Oaks and all of the San Fernando Valley, with many experiencing the building on a daily basis from the 101 freeway. We submit the following comments to ensure that the proposed project will not adversely impact the historic building and meet the Secretary of the Interior’s Standards to ensure eligibility as an historic resource is maintained.

Designed by prominent local architecture firm Albert C. Martin & Associates and completed in 1970, the Sunkist Headquarters Building is a significant example of Brutalist style architecture. It was constructed as the international headquarters of the Sunkist Growers, Inc., replacing the company’s 1935 Art Deco office building in downtown Los Angeles. The move to Sherman Oaks came at a time when the neighborhood was successfully attracting corporate headquarters.

The three-story structure is set on a raised podium, with an expansive terrace encircling the first level. Centrally placed staircases provide access to the terrace level and punctuate the sloped landscaping that extends along each elevation between the terrace and the parking lot surrounding the structure. The building contains a one-hundred, square foot inner courtyard that is currently open to the air.
Brutalism is an architectural style that developed in the postwar era that most often utilized concrete construction and emphasized qualities of massive weightiness and striking, geometric and repetitive shapes. The monumentally scaled Sunkist Building features reinforced concrete construction and exterior walls that slope outward as they rise to the roofline. Deeply recessed windows are arranged between tapered concrete piers, with an alternating arrangement between the upper floors. The concrete piers of the terrace level taper inward as they rise, giving a heightened sense of contrast to the building’s profile.

The Conservancy and its Modern Committee have long believed the Sunkist Headquarters Building to be a highly significant Modernist structure from the recent past. It was profiled in the Conservancy’s 2000 tour called How Modern Was My Valley. The Sunkist Building is profiled in *An Architectural Guidebook to Los Angeles* by David Gebhard and Robert Winter. The NOP accurately identifies the Sunkist Headquarters Building as a potential historic resource.

The Draft Environmental Impact Report (EIR) should evaluate the architectural and historical significance of the Sunkist Headquarters Building, including the identification of character-defining features, and assess whether proposed modifications might impact the structure’s integrity and eligibility as an historic resource. As currently proposed in the NOP, the project calls for the “renovation of the lobby and atrium and modification to the building entrance to provide a canopy.” Further, it states “the interior courtyard of the building would be enhanced with a water feature, seating areas, and planting areas.” It is unclear if the existing landscape and terrace surrounding the building would be affected. There also are no details provided about any possible seismic retrofits that might be included within the scope of this project. This limited description leaves uncertainty as to whether the modifications would fully meet the *Secretary of the Interior’s Standards* and should be addressed in the Draft EIR.

The Draft EIR should also evaluate the visual character and aesthetic impact of proposed new construction. The addition of three new residential/commercial buildings and a parking structure will change the look and feel of the Sunkist property. All efforts should be made to ensure this development is designed in a manner that is both compatible and appropriate in scale and massing to protect the integrity of the Sunkist Headquarters Building in accordance with the *Secretary of the Interior’s Standards*.

As currently planned, the Sunkist Building would be surrounded on its west, north and east sides with new structures that block long-established views of the structure from the streets to the north, east and west. The only unobstructed views remaining of the Sunkist Headquarters Building will be from the 101 freeway. Buildings A and B, with will be located on the north side of the property adjacent to Riverside Drive, with both contain five above ground levels, while the parking structure planned for the east side of the property will contain four above grade levels. Building C, proposed for the west side of the property, is planned to have a stepped profile ranging from two to four levels.
If the proposed project is found to adversely impact the integrity, setting and ultimately the eligibility of the Sunkist Headquarters Building, the Draft EIR must consider preservation alternatives and adequate mitigation measures proposed to substantially lessen or avoid such impacts.

**About the Los Angeles Conservancy:**
The Los Angeles Conservancy is the largest local historic preservation organization in the United States, with nearly 6,500 members throughout the Los Angeles area. Established in 1978, the Conservancy works to preserve and revitalize the significant architectural and cultural heritage of Los Angeles County through advocacy and education.

Please feel free to contact me at (213) 430-4203 or afine@laconservancy.org should you have any questions.

Sincerely,

Adrian Scott Fine
Director of Advocacy