LOS ANGELES CONSERVANCY

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September 22, 2016

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), Draft Environmental Impact Report (ENV-2014-1362-EIR)

Dear Ms. Molina-Pearson:

On behalf of the Los Angeles Conservancy, thank you for the opportunity to comment on the Draft Environmental Impact Report (EIR) for the ICON Sherman Oaks Project (Sunkist). The Conservancy met with the project team early in the development process and remains encouraged that this project intends to retain and reinvest in the historic Sunkist Headquarters Building. The Brutalist building is an important architectural icon in the San Fernando Valley, and we concur with the Draft EIR's evaluation of the property as eligible for designation at the national, state, and local levels.

We submit these comments to ensure that the Sunkist Building remains an eligible historic resource, including full compliance with the *Secretary of the Interior's Standards*, the preparation of a detailed preservation plan, and local Historic-Cultural Monument (HCM) designation. We also strongly recommend additional analysis of the potential indirect impacts on the building from the proposed new construction and urge further exploration of viable alternatives that would retain significant views from Riverside Drive and provide additional visual buffers around the historic structure.

I. Historic significance of the Sunkist Headquarters Building

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.

Conceived in the postwar era, Brutalism is an architectural style that most often employed 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.

In 2015, the Sunkist Building was identified as eligible for listing in the National Register of Historic Places, the California Register of Historical Resources, and as a Los Angeles Historic-Cultural Monument (HCM) through SurveyLA, the City of Los Angeles' comprehensive historic resources survey. The Historical Resources Assessment included in the Draft EIR supports this finding.

II. Proposed Sunkist rehabilitation plan and conformance to *Standards*

The Conservancy appreciates that the proposed project will rehabilitate and incorporate the Sunkist Building into the larger development planned for the site. While we understand that the proposed rehabilitation plan will minimize modifications to the historic structure, we believe that additional documentation of existing conditions and description of proposed treatments are needed to clarify the scope and potential impacts of the project.

According to the Draft EIR, the proposed project would demolish the existing plinth walls and landscaped berm and insert new terraced landscaping features around the perimeter of the Sunkist Building. Because the landscaping is a key character-defining feature of the property, we question the need for and purpose of this alteration on all four elevations, especially given the scale of construction proposed adjacent to three of those elevations. The loss of the berm, which contributes to the monumentality of the structure, could compound potential impacts to the building's historic setting. The analysis states that the alterations to the berm and plinth will "better integrate [the Sunkist Building] with adjacent new construction." Are there alternative means of enhancing the pedestrian experience without removing these historic features on all four sides?

We similarly request further clarification regarding changes to the exterior ground level, including the new door and window treatment, the repainting of the columns, and the construction of a new canopy on the north entrance.

The historical assessment describes the bronze tinted glass windows as a signature characteristic of Albert C. Martin & Associates' postwar work, although the feature is not included in the list of character-defining features. The plans indicate that the main entry doors will be replaced with glazed, clear glass double doors, but one can infer from the drawings and analysis that the surrounding ground floor windows and doors will retain the existing bronze tinted glass and dark bronze metal. Are modifications proposed for windows and doors on other elevations, or will only the main entry receive the new treatment?

The plans also show that the exterior ground level columns will be repainted to a grey tone, a change that we presume will occur on all four elevations. Though limited information is provided, it appears that the proposed change relates to the redesign of the berm and plinth and the desire to integrate the Sunkist Building into its surroundings. While we appreciate that the cosmetic work would be reversible, we are concerned about its effects on the readability of the structure. The uniform treatment of the concrete reinforces the building's inverted pyramidal massing, and the ground level modification would likely reduce its overall cohesion.

Similarly, the insertion of a new steel frame canopy feature at the main entrance could detract from the building's original composition. While the open design allows for some transparency, its protrusion from the building interrupts the existing geometry when viewed from the east and west, and the trellis introduces a new texture.

We also understand that the rehabilitation includes significant changes to the courtyard in order to reactivate the space and improve habitability. Because the courtyard has been altered from its original appearance, we appreciate that the proposed plan respects and references its original character while creating a more functional space. Nonetheless, we request additional information about the placement and management of the proposed module terrace boxes. Though they will help facilitate a more inviting outdoor space, they do add a new materiality and dimension to the existing rows of windows and should be inserted sparingly. The final rehabilitation plan should also include information about ongoing maintenance in order to prevent damage to the concrete panels from drainage and other potential issues.

While these changes individually may appear modest, together they introduce a new series of materials and geometries to a uniformly composed structure, which alters the overall rhythm and experience from the pedestrian level. We appreciate the effort to minimize alterations to the Sunkist Building and believe the rehabilitation plan is heading in the right direction, but we still have outstanding questions about full conformance to the *Standards*.

In order to address the application of the *Standards* and provide greater clarity to the proposed project, the Final EIR should include a detailed preservation plan for the Sunkist Building that expands on the 2014 Design Narrative included in the Draft EIR.

The plan should incorporate a full historic structures report (HSR), which would document and assess the building's unique existing conditions and provide clear recommendations for the appropriate treatments. We have previously pressed for a seismic evaluation of the building, and the plan should incorporate recommendations for any necessary structural work. It should include guidelines for managing new landscape features in order to minimize damage to historic elements, as well as a cohesive signage program. Furthermore, applicant should establish a clear timeline for completing the work to ensure that the building is rehabilitated in tandem with the new construction.

Lastly, though the Draft EIR includes a list of character-defining features, the current inventory appears to leave out key elements without justification, including materials, roof design, windows, doors, and signage. The preservation plan should reflect and plan for a more complete list of historic elements.

III. Final EIR should further analyze impacts from adjacent new construction on the Sunkist Building and refine feasible alternatives

Conservancy has previously expressed concern over the potential impacts to the Sunkist Building's integrity of setting, as the proposed project would encase the historic structure with new construction on three of its four elevations. We understand that the project team has been working with the neighboring community to address issues related to scale and bulk, and we appreciate their efforts to design a new project that is sensitive to its surrounding context.

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. The only remaining unobstructed views would be from the 101 freeway. Buildings A and B, proposed for the north side of the property adjacent to Riverside Drive, would both contain five above ground levels, while the parking structure planned for the east side of the property would contain four above grade levels. Building C, proposed for the west side of the property, is designed with a stepped profile ranging from two to four levels in order to provide a transitional buffer to the adjacent neighborhood.

Though the Sunkist Building's south elevation would remain visible, the proposed scale, height, and massing of the new construction would nonetheless dramatically alter and overwhelm the monumental look and feel of the property historically. We strongly encourage the City and applicant

to further analyze the visual character and aesthetic impacts of the proposed new construction on the Sunkist Building. In particular, we request the preparation of additional conceptual renderings and perspectives, with an emphasis on the pedestrian experience, in order to accurately convey proposed setbacks, view sheds, and the project's overall scale. These drawings should also clearly illustrate the relationships between the new buildings and the Sunkist Building, including height and proportions.

The Draft EIR considers one alternative that would slightly reduce impacts to historic resources, and we strongly encourage further refinement in the Final EIR. Alternative 5, "Reduced Density and Square Footage," would increase the view corridor of the Sunkist Building on its Riverside Drive elevation by reducing the footprint of Building A, though the height of all four new structures would remain the same. More details are needed to compare this scenario to the proposed project, including conceptual drawings, perspectives, and sight-line analysis. Given the primacy of the view of the Sunkist Building from Riverside Drive, the Final EIR should also explore options for reducing the footprint of Building B. This modification would enhance the Sunkist Building's presence at the property's main entrance and retain the project's symmetrical composition in a way that complements the historic structure.

IV. Nominate the Sunkist Headquarters Building as a Historic-Cultural Monument to ensure proposed project meets *Standards*

Given the architectural and historic significance of the Sunkist Building, the Conservancy strongly urges inclusion of a third mitigation measure to require the applicant to nominate the property for Historic-Cultural Monument designation. The Draft EIR recognizes the building's exceptional importance for its association with Sunkist Growers, Inc. and as a significant work of Brutalist architecture by renowned firm Albert C. Martin and Associates, making formal designation an appropriate means of reducing impacts.

HCM designation would enable the City's Cultural Heritage Commission and staff to review and comment on the project design and details for compliance with the *Secretary of the Interior's Standards*. While Mitigation Measure D-1 stipulates that a qualified preservation architect will submit documentation to the Office of Historic Resources for review and approval prior to the issuance of building permits, the HCM designation would create a public process for modifications to the building, including those that could be proposed as part of a separate project in the future. Designation would also enable access to valuable preservation incentives, including property tax benefits under the Mills Act program.

Given the substantial role of the Sunkist Building in the late twentieth-century development of the San Fernando Valley, the Conservancy also recommends that the applicant consider options for

more permanent protection, including a conservation easement. An easement, which is a private agreement that could offer additional tax benefits, would ensure that the property is sensitively preserved and maintained in perpetuity. Because it would not be subject to external pressures, an easement would offer community stakeholders long-term assurance over the Sunkist Building's future.

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. The Conservancy's all-volunteer Modern Committee has been at the forefront of preserving mid-century architecture since its inception in 1984.

We welcome and request the opportunity to continue working with members of the project team to ensure that the Sunkist Building remains an eligible historic resource and would like to arrange a meeting in the near future. 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

cc: City Councilmember David Ryu, Council District 4
Ken Bernstein, Office of Historic Resources
Sherman Oaks Neighborhood Council