

# Appendices

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## **Appendix FEIR-1**

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Draft EIR Comment Letters



EDMUND G. BROWN JR.  
GOVERNOR

STATE OF CALIFORNIA  
GOVERNOR'S OFFICE *of* PLANNING AND RESEARCH  
STATE CLEARINGHOUSE AND PLANNING UNIT



KEN ALEX  
DIRECTOR

September 28, 2016

Sarah Molina-Pearson  
City of Los Angeles  
200 N. Spring Street, Room 750  
Los Angeles, CA 90012

Subject: ICON Sherman Oaks  
SCH#: 2014071001

Dear Sarah Molina-Pearson:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on September 27, 2016, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

"A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Scott Morgan  
Director, State Clearinghouse

Enclosures  
cc: Resources Agency

**Document Details Report  
State Clearinghouse Data Base**

**SCH#** 2014071001  
**Project Title** ICON Sherman Oaks  
**Lead Agency** Los Angeles, City of

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**Type** EIR Draft EIR  
**Description** Note: Extended Review Per Lead

IMT Capital, LLC, the Project Applicant, proposes to develop a mixed-use project on an approximate 8.3 acre site located at 14130 and 14154 West Riverside Drive in the Sherman Oaks Community of the City of Los Angeles. The Project would include 298 multi-family residential units and approximately 39,241 sf of neighborhood-serving commercial uses that would include up to 7,241 sf of restaurant uses. The Project would provide 1,345 parking spaces within above and below-grade parking levels within the northern and western portions of the Project Site and within a six-level parking structure that would include two below-grade levels and four above-grade levels within the eastern portion of the Project Site. The existing Sunkist Building would be retained, preserved, and rehabilitated as part of the Project.

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**Lead Agency Contact**

**Name** Sarah Molina-Pearson  
**Agency** City of Los Angeles  
**Phone** 213 473 9983 **Fax**  
**email**  
**Address** 200 N. Spring Street, Room 750  
**City** Los Angeles **State** CA **Zip** 90012

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**Project Location**

**County** Los Angeles  
**City** Los Angeles, City of  
**Region**  
**Lat / Long** 34° 9' 23" N / 118° 26' 28" W  
**Cross Streets** Riverside Drive and Hazeltine Avenue  
**Parcel No.** 2248029009  
**Township** **Range** **Section** **Base**

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**Proximity to:**

**Highways** US-101  
**Airports**  
**Railways**  
**Waterways** Los Angeles River  
**Schools**  
**Land Use** office/C2-1L, PB-1L, P-1L/Community

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**Project Issues** Air Quality; Archaeologic-Historic; Drainage/Absorption; Noise; Public Services; Recreation/Parks; Schools/Universities; Traffic/Circulation; Water Quality; Water Supply; Landuse; Cumulative Effects; Other Issues; Flood Plain/Flooding; Soil Erosion/Compaction/Grading

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**Reviewing Agencies** Resources Agency; Department of Fish and Wildlife, Region 5; Office of Historic Preservation; Department of Parks and Recreation; Department of Water Resources; Office of Emergency Services, California; California Highway Patrol; Caltrans, District 7; Department of Housing and Community Development; Regional Water Quality Control Board, Region 4; Native American Heritage Commission

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**Date Received** 07/28/2016 **Start of Review** 07/28/2016 **End of Review** 09/27/2016



**DEPARTMENT OF TRANSPORTATION**  
DISTRICT 7, OFFICE OF REGIONAL PLANNING  
IGR/CEQA BRANCH  
100 MAIN STREET, MS # 16  
LOS ANGELES, CA 90012-3606  
PHONE: (213) 897-0219  
FAX: (213) 897-1337



*Serious drought  
Help save water!*

*clear  
9/27/16  
G*

Governor's Office of Planning & Research

SEP 27 2016

STATE CLEARINGHOUSE

September 22, 2016

Ms. Sarah Molina-Pearson  
City of Los Angeles  
200 N. Spring Street, Room 750  
Los Angeles, CA 90012

Re: **ICON Sherman Oaks**  
Vic: LA-101/PM 17.145  
SCH#2014081001  
GTS# LA-2016-00064ME-DEIR

Dear Ms. Molina-Pearson:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the proposed ICON Sherman Oaks Project. The project proposes to develop a mixed-use project on an approximate 8.3-acre site located at 14130 and 14154 West Riverside Drive. The project would include 298 multi-family residential units and approximately 39,241 square feet of neighborhood-serving commercial uses that would include up to 7,241 square feet of restaurant uses.

The project site is directly adjacent to State Route 101 and will generate a net 4,412 daily trips and 267/400 AM/PM peak hour trips. There are 12 related projects that will generate additional daily trips, therefore cumulative impacts may occur. As a reminder, the decision makers should be aware of this issue and be prepared to mitigate cumulative traffic impacts in the future.

Based on a review of the Draft Environmental Impact Report, Caltrans has the following comments:

1. The Department's Traffic Operations Branch requests all applicants to use the method outlined in the latest version of the Highway Capacity Manual (HCM) when analyzing traffic impacts on State Transportation Facilities. The use of HCM is preferred by the Department because it is an operational analysis opposed to a planning analysis.
2. Per PEMS data, the segment of Route 101 Freeway between Fulton Ave and Kester Ave operates at a LOS of E/F during peak hours periods. Although, counts were provided for the off-ramps at Woodman Ave. The data did not include a queuing analysis of the ramps, it is noted a queuing analysis was done for driveways.

Ms. Molina-Pearson  
September 22, 2016  
Page 2 of 2

In the Spirit of mutual cooperation, Caltrans staff is available to work with your planners and traffic engineers for this project, if needed. If you have any questions regarding these comments, please contact project coordinator Ms. Miya Edmonson, at (213) 897-6536 and refer to GTS# LA-2016-00064ME

Sincerely,

A handwritten signature in cursive script, appearing to read "Alon Liu for".

DIANNA WATSON  
IGR/CEQA Branch Chief

cc: Scott Morgan, State Clearinghouse

**DEPARTMENT OF TRANSPORTATION**

DISTRICT 7, OFFICE OF REGIONAL PLANNING

IGR/CEQA BRANCH

100 MAIN STREET, MS # 16

LOS ANGELES, CA 90012-3606

PHONE: (213) 897-0219

FAX: (213) 897-1337

*Serious drought  
Help save water!*

September 22, 2016

Ms. Sarah Molina-Pearson  
City of Los Angeles  
200 N. Spring Street, Room 750  
Los Angeles, CA 90012

Re: **ICON Sherman Oaks**  
Vic: LA-101/PM 17.145  
SCH#2014081001  
GTS# LA-2016-00064ME-DEIR

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The project site is directly adjacent to State Route 101 and will generate a net 4,412 daily trips and 267/400 AM/PM peak hour trips. There are 12 related projects that will generate additional daily trips, therefore cumulative impacts may occur. As a reminder, the decision makers should be aware of this issue and be prepared to mitigate cumulative traffic impacts in the future.

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Ms. Molina-Pearson  
September 22, 2016  
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Sincerely,

A handwritten signature in cursive script, appearing to read "Alon Liu for".

DIANNA WATSON  
IGR/CEQA Branch Chief

cc: Scott Morgan, State Clearinghouse



**Metro**

Los Angeles County  
Metropolitan Transportation Authority

One Gateway Plaza  
Los Angeles, CA 90012-2952

213.922.2000 Tel  
metro.net

**RECEIVED**  
CITY OF LOS ANGELES

**SEP 23 2016**

MAJOR PROJECTS  
UNIT

September 7, 2016

Sarah Molina-Pearson  
City of Los Angeles  
Department of City Planning  
200 N. Spring Street, Room 750  
Los Angeles, CA 90012

**RE: ICON Sherman Oaks – 14130 and 14154 Riverside Drive – City of Los Angeles – Draft  
Environmental Impact Report – ENV-2014-1362-EIR**

Dear Ms. Molina-Pearson:

Thank you for the opportunity to comment on the proposed ICON Sherman Oaks mixed-use project located at 14130 and 14154 Riverside Drive in the City of Los Angeles. This letter conveys recommendations from the Los Angeles County Metropolitan Transportation Authority (LACMTA) concerning issues that are germane to our agency's statutory responsibility in relation to our facilities and services that may be affected by the proposed project.

**Project Description:**

The proposed project is a mixed-use development project comprised of residential and neighborhood-serving commercial uses on an approximate 8.3-acre site in the Van Nuys-North Sherman Oaks Community Plan area of the City of Los Angeles. These new uses would be integrated with the existing Sunkist Growers, Inc. international headquarters building, which would be maintained and rehabilitated as part of the project. The project would specifically include three new buildings that would provide a total of 298 new multi-family residential units and approximately 39,241 square feet of neighborhood-serving commercial uses, including up to 7,241 square feet of restaurant uses. In addition, upon completion, the project would provide a total of 1,345 parking spaces for the proposed uses and the Sunkist building. Parking spaces for employees of the Sunkist Building and the proposed neighborhood-serving commercial uses would be provided in a new parking structure to the east of the Sunkist Building. Parking for residents and guests of residents would be provided in two levels of below-grade parking within the northern and western portions of the Project Site, and integrated within Level 1 of Building B. The proposed buildings and the Sunkist Building to remain would be integrated and connected within the project site via numerous outdoor landscaped areas and landscaped pedestrian pathways.

**Metro Comments:**

*Bus Operations:*

Metro bus line 155 operates on Riverside Drive, adjacent to the proposed project. Although the project is not expected to result in any long-term impacts on transit, the developer should be aware of the bus services that are present. Please contact Metro Bus Operations Control Special Events Coordinator at 213-922-4632 regarding construction activities that may Impact Metro bus lines at least 30 days in

advance of initiating construction activities. For closures that last more than six months, Metro's Stops and Zones Department will also need to be notified at 213-922-5188, 30 days in advance of initiating construction activities. Other municipal bus operators may also be impacted and should be included in construction outreach efforts.

*Transit Connectivity:*

To support first/last mile connections to transit service, LACMTA encourages the installation of pedestrian lighting, shade trees, and amenities along the primary building frontage, as well as enhanced crosswalks with ADA-compliant ramps at the intersection to improve pedestrian safety and comfort. The City should consider requesting the installation of such amenities as part of the development of the site.

*Active Transportation:*

1. We encourage the City to work with the developer to provide safe and convenient connections for pedestrians, people riding bicycles, and users of Metro Bus system and other transit services to and from the project.
2. The City, working with the developer, may wish to evaluate and consider pedestrian crossings at the intersections of Riverside Drive/Calhoun Avenue or Riverside Drive/Stansbury Avenue.
3. Short-term bike parking should be placed near ground level entrances so they are visible and easily accessible to all users, including Metro transit users. Consider working with the developer to implement bicycle racks on the public right-of-way and/or curbside bicycle corrals.

*Congestion Management Program:*

Beyond impacts to Metro facilities and operations, LACMTA must also notify the applicant of state requirements. A Transportation Impact Analysis (TIA), with roadway and transit components, is required under the State of California Congestion Management Program (CMP) statute. The CMP TIA Guidelines are published in the "2010 Congestion Management Program for Los Angeles County", Appendix D (attached). The geographic area examined in the TIA must include the following, at a minimum:

1. All CMP arterial monitoring intersections, including monitored freeway on/off-ramp intersections, where the proposed project will add 50 or more trips during either the a.m. or p.m. weekday peak hour (of adjacent street traffic).
2. If CMP arterial segments are being analyzed rather than intersections, the study area must include all segments where the proposed project will add 50 or more peak hour trips (total of both directions). Within the study area, the TIA must analyze at least one segment between monitored CMP intersections.
3. Mainline freeway-monitoring locations where the project will add 150 or more trips, in either direction, during either the a.m. or p.m. weekday peak hour.
4. Caltrans must also be consulted through the NOP process to identify other specific locations to be analyzed on the state highway system.

The CMP TIA requirement also contains two separate impact studies covering roadways and transit, as outlined in Sections D.8.1 – D.9.4. If the TIA identifies no facilities for study based on the criteria

ICON Sherman Oaks Project  
Notice of Completion and Availability  
LACMTA Comment Letter September 7, 2016

above, no further traffic analysis is required. However, projects must still consider transit impacts. For all CMP TIA requirements please see the attached guidelines.

If you have any questions regarding this response, please contact Elizabeth Carvajal at 213-922-3084 or by email at [DevReview@metro.net](mailto:DevReview@metro.net). **LACMTA looks forward to reviewing the Final EIR. Please send it to the following address:**

**LACMTA Development Review  
One Gateway Plaza MS 99-23-4  
Los Angeles, CA 90012-2952**

Sincerely,



Elizabeth Carvajal  
Transportation Planning Manager

Attachment: CMP Appendix D: Guidelines for CMP Transportation Impact Analysis

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From: **Gordon Mize** <[gmize@aqmd.gov](mailto:gmize@aqmd.gov)>

Date: Thu, Aug 11, 2016 at 6:08 PM

Subject: SCAQMD Staff Comments for the Proposed ICON Sherman Oaks Mixed-Use Project DEIR

To: "[Sarah.Molina-Pearson@lacity.org](mailto:Sarah.Molina-Pearson@lacity.org)" <[Sarah.Molina-Pearson@lacity.org](mailto:Sarah.Molina-Pearson@lacity.org)>

Sarah Molina-Pearson, Project Planner  
Department of City Planning  
City of Los Angeles

Re: ICON Sherman Oaks DEIR (Case No. ENV-2014-1362-EIR) in the Van Nuys – North Sherman Oaks Area for the City of Los Angeles

Attached are the SCAQMD staff comments for the above-mentioned CEQA document. The original, electronically signed letter will be sent to your attention by regular USPS mail. If you have any questions, please feel free to contact me.

Sincerely,

**Gordon E. Mize**  
**Air Quality Specialist**  
**South Coast Air Quality Management District**  
**CEQA, Inter-Governmental Review**  
**(909) 396-3302 Phone**  
**(909) 396-3324 Fax**  
**gmize@aqmd.gov**





**South Coast  
Air Quality Management District**  
21865 Copley Drive, Diamond Bar, CA 91765-4178  
(909) 396-2000 • [www.aqmd.gov](http://www.aqmd.gov)

SENT VIA E-MAIL AND USPS:  
[sarah.molina-pearson@lacity.org](mailto:sarah.molina-pearson@lacity.org)

August 11, 2016

Sarah Molina-Pearson, Project Planner  
Department of City Planning  
City of Los Angeles  
200 North Spring Street, Room 750  
Los Angeles, CA 90012

**Draft Environmental Impact Report (DEIR) for the  
Proposed ICON Sherman Oaks Mixed-Use Project  
(ENV-2014-1362-EIR and SCH NO. 2014071001)**

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the Lead Agency and should be incorporated into the Final EIR.

**Project Description**

In the project description, the Lead Agency proposes a mixed-use project that will retain but remodel the existing 126,674 square foot, three-story office building and develop the 8.3-acre site with residential and commercial uses. The residential portion of the project will be comprised of three buildings that will house a total of 298 new multi-family residential units. Approximately 39,241 square feet of commercial uses will also include approximately 7,241 square feet for restaurant purposes. Parking will be provided for up to 1,345 parking spaces with two-below grade parking levels planned for Building C. Soil disturbance activities will include approximately 162,000 cubic yards of grading and require approximately 157,400 cubic yards of soil export. Construction will occur over a 33-month period and is planned to be completed in 2018.

**Health Risk Assessment and Associated Mitigation**

The Lead Agency notes that the project site is near the Hollywood (US-101) Freeway with portions of the residential buildings located within 500 feet of US-101. Based on the Health Risk Assessment (HRA), the Lead Agency estimated the potential cancer risk from nearby SCAQMD permitted stationary sources and from potential exposure to diesel particulate matter, a toxic air contaminant, from vehicles operating on the nearby freeway. Based on the HRA results from all sources, the total maximum cancer risk to the residents would be 17 in one million, which would exceed the SCAQMD's recommended significance threshold of 10 in one million cases. To reduce the estimated risk to a less than significant level,<sup>1</sup> the Lead Agency proposes mitigation including installation of a heating, ventilation, and air conditioning (HVAC) air filtration system in each residential building. The air filtration system will have a Minimum Efficiency Reporting Value (MERV) of 13 or higher. HVAC and air filtration system support actions will include the servicing of these systems and are

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<sup>1</sup> DEIR, Appendix IV – Environmental Impact Analysis – B, Air Quality, Page IV.B-59.

also part of the development's proposed mitigation.<sup>2</sup> Based on the proposed mitigation, the project's cancer risk was estimated to be less than significant.

#### Limits to Enhanced Filtration Units

The Lead Agency should consider the limitations of the proposed mitigation for this project (enhanced filtration) on housing residents. For example, because the filters would not have any effectiveness unless the HVAC system is running, there may be increased energy costs to the resident. The proposed mitigation also assumes that the filters operate 100 percent of the time while residents are indoors. These filters also have no ability to filter out any toxic gases from vehicle exhaust. The presumed effectiveness and feasibility of this mitigation should therefore be evaluated in more detail prior to assuming that it will sufficiently alleviate near roadway exposures.

#### Compliance With SCAQMD Rules

Finally, the project includes some demolition that could occur during the renovation of the existing Sunkist Building and soil disturbance activities during grading and excavation that could fall under the following SCAQMD rules: Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities would apply if asbestos is found during demolition, and Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil would apply if soils containing Volatile Organic Compounds (VOCs) are encountered during soil disturbance activities. If applicable, compliance with these rules should be included in the Final EIR.

Pursuant to Public Resources Code Section 21092.5, SCAQMD staff requests that the Lead Agency provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final EIR. Further, staff is available to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Gordon Mize, Air Quality Specialist CEQA Section, at (909) 396-3302, if you have any questions regarding the enclosed comments.

Sincerely,

*Jillian Wong*

Jillian Wong, Ph.D.  
Planning and Rules Manager  
Planning, Rule Development & Area Sources

JW:GM

LAC160802-01  
Control Number

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<sup>2</sup> Support actions described on Page IV-B-58 in Mitigation Measure (MM) B-2 and in MM-BB-3 describes added features to support reduced exposures to future sensitive receptors.

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From: **Tom Williams** <[ctwilliams2012@yahoo.com](mailto:ctwilliams2012@yahoo.com)>  
Date: Tue, Sep 27, 2016 at 3:43 PM  
Subject: ICON Sherman Oaks DEIR CITY CASE NO. ENV-2014-1362-EIR SCH. NO. 2014071001 Public Comments  
To: "\"Sarah Molina-Pearson\"" <[sarah.molina-pearson@lacity.org](mailto:sarah.molina-pearson@lacity.org)>  
Cc: "\"Diana Kitching\"" <[Diana.Kitching@lacity.org](mailto:Diana.Kitching@lacity.org)>, Paul Ferrazzi <[ccfasdirector@gmail.com](mailto:ccfasdirector@gmail.com)>, Gary Gless <[800ccsc@gmail.com](mailto:800ccsc@gmail.com)>, Khin Gyi <[kkgyi@sbcglobal.net](mailto:kkgyi@sbcglobal.net)>

September 27, 2016 4pm

**TO:** City of Los Angeles Department of City Planning

**ATTN.:** "Sarah Molina-Pearson" <[sarah.molina-pearson@lacity.org](mailto:sarah.molina-pearson@lacity.org)> LA Dept. City Plan'g.  
200 North Spring Street, Room 750 Los Angeles, CA 90012 [\(213\) 473-9723](tel:(213)473-9723)

**CC:** Council District: 4 - David Ryu Community Plan Area: Van Nuys-North Sherman Oaks  
"Diana Kitching" <[Diana.Kitching@lacity.org](mailto:Diana.Kitching@lacity.org)> LA Dept. City Plan'g.  
200 N. Spring Str., Rm. 750 LA, CA 90012

**FROM:** **Dr. Tom Williams** [323-528-9682](tel:323-528-9682) [ctwilliams2012@yahoo.com](mailto:ctwilliams2012@yahoo.com)  
4117 Barrett Rd. Los Angeles, CA 90032

**Subject:** **ICON Sherman Oaks DEIR CITY CASE NO. ENV-2014-1362-EIR SCH. NO. [2014071001](#)**  
**Public Comment**

Dear Ms. Molina-Pearson

On behalf of the Citizens Coalition for A Safe Community, thank you for the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the ICON Project.

CCSC is very concerned about several key areas in the EIR analysis that we believe to be incomplete and inadequate or with many deficiencies and errors. As a result the DEIR is significantly flawed and cannot be utilized for purposes of adequate environmental review and comment. Because the DEIR has relied on several flawed evaluations, conclusions, derived from the DEIR pertaining to the identification of potential various resources, potential adverse impacts, adequacy of mitigation and compensation, and the evaluation of project alternatives, are all equally flawed. As such, the CEQA process for this project must not proceed to the Final EIR (FEIR) without revised evaluations and recirculation of a revised or supplemental DEIR.

We request the City to require preparation of a totally revised DEIR with re-evaluations using adequate numerical/quantified settings and proper methodologies and to mandate further consideration of specific plan and corridor alternatives and transportation mitigation measures (DASH, shuttles, commuter/employee buses as part of the ongoing environmental review process.

September 27, 2016 4pm

**TO:** City of Los Angeles Department of City Planning

**ATTN.:** Sarah Molina-Pearson sarah.molina-pearson@lacity.org LA Dept. City Plan'g.  
200 North Spring Street, Room 750 Los Angeles, CA 90012 (213) 473-9723

**CC:** Council District: 4 - David Ryu Community Plan Area: Van Nuys-North Sherman Oaks  
Diana Kitching Diana.Kitching@lacity.org LA Dept. City Plan'g.  
200 N. Spring Str., Rm. 750 LA, CA 90012

**FROM:** **Dr. Tom Williams 323-528-9682 ctwilliams2012@yahoo.com**  
**4117 Barrett Rd. Los Angeles, CA 90032**

**Subject:** ICON Sherman Oaks DEIR  
**RE:** CITY CASE NO. ENV-2014-1362-EIR SCH. NO. 2014071001  
**Public Comments**

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Some General Comments:

Lack/Absence of:

- definitions, specificity, objectivity, and quantification of statements;
- well-defined project objectives;
- focused application to the Project, alternatives, and comparisons;
- basis for public advocated alternatives;
- factual and numerical and of referenced materials for statements;
- simple mitigation/compensatory measures, e.g.,

- #1-congestion: discounted TAP cards, ROT shuttles (Computer Express from site to/from north Red and Union Stations), van-pools, etc.;

- #2-light, noise, and vibrations: source shrouds and decorative/planted barriers;
  - land use alternative of Specific Corridor Plan as mitigation for "spot zoning" and variances;

Widespread use of "feasibility/Infeasibility" and "practical" without economic and quantitative analyses

Thank You

Dr. Tom Williams

Specific comments:

**2-3/5 4. Land Use and Zoning a. Van Nuys–North Sherman Oaks Community Plan** The Project Site is located...(Community Plan) area that was adopted in September 1998...designates the Project Site for Community Commercial land uses....5/1...encompass a broad range of retail and service uses...Generally, these uses are located within one mile of residents. The Community Commercial land use designation corresponds with the C1.5..., C2..., CR..., C4..., RAS3..., and RAS4...zones in the LAMC.

***No plan of almost 20 years without an update can reflect the current land use planning and development issues and generally is not acceptable for state compliances, e.g., CEQA.***

***No use/demand/residential analyses of one mile radius has been provided and therefore no factual information supports/rejects the statement.***

***Given the lack of planning context, the proposed project must be considered in a broader context and the project and all similar properties along Riverside Dr. must be planned as a program (e.g., specific corridor plan supplementing the eventual re-development of the current, out dated Community Plan.***

***Revise the DEIR and include the proposed project as part of a Riverside Dr. Specific Plan Alternative.***

**2-6/1 5. Project Objectives** Section...(CEQA) Guidelines states that the project description shall contain "a statement of the objectives sought by the proposed project."...further states that "the statement of objectives should include the underlying purpose of the project."...is to create a high-quality, mixed-use development...integrated with neighborhood-serving commercial and recreational uses....specific objectives... below.

***No definition, enumeration, or quantification of "high quality" or "neighborhood-serving" is provided in the DEIR, and therefore no proposed development would appear to meet this stated goal.***

***As the objectives are totally inadequate or incomplete, development of the project and the alternatives are rendered inadequate if not incomplete. Without the objectives, any development of a public comment-alternative will suffer from the same issues.***

***Revise the DEIR and include the adequately defined, enumerated, and quantified objectives herein and use for the development of adequate alternatives and their comparisons, including a more comprehensive specific corridor plan.***

☐ Integrate new housing opportunities with neighborhood-serving commercial uses, recreational uses and existing office uses;

***No definition, enumeration, or quantification of "neighborhood-serving" is provided in the DEIR and therefore no proposed development would appear to meet this stated objective.***

***Revise the DEIR and include the adequately defined, enumerated, and quantified objectives herein and use for the development of adequate alternatives and their comparisons, including a more comprehensive specific corridor plan.***

☐ Maximize new housing units on the Project Site to help meet the market demand for new housing in the region and in the City of Los Angeles;

***Objective is unclear as to region of LACo or LACity.***

***No market demand information has been provided to support/refute compliance of the project or any alternatives.***

***No definition, enumeration, or quantification of "neighborhood-serving" is provided in the DEIR, and therefore no proposed development would appear to meet this stated objective.***

***Revise the DEIR and include the adequately defined, enumerated, and quantified objectives herein and use for the development of adequate alternatives and their comparisons, including a more comprehensive specific corridor plan.***

☐ Provide convenient neighborhood-serving commercial uses and open space within walking distance of existing off-site residential and commercial uses, proposed on-site residential uses and on and off-site office uses;

***Unclear as to whether the walking distance is related to the earlier use of "one mile"; revise and clarify.***

***No definition, enumeration, or quantification of "neighborhood-serving" is provided in the DEIR, and therefore no proposed development would appear to meet this stated objective.***

**Revise the DEIR and include the adequately defined, enumerated, and quantified objectives herein and use for the development of adequate alternatives and their comparisons, including a more comprehensive specific corridor plan.**

☐ Create an aesthetically attractive, high-quality design that engages the Los Angeles River and complements the existing Sunkist Building;

**No definition, enumeration, or quantification of "aesthetically attractive", "high-quality design", and "neighborhood-serving" is provided in the DEIR, and therefore no proposed development would appear to meet this stated objective.**

**Revise the DEIR and include the adequately defined, enumerated, and quantified objectives herein and use for the development of adequate alternatives and their comparisons, including a more comprehensive specific corridor plan.**

☐ Develop a mixed-use project at the residential density and intensity consistent with the zones permitted by the Project Site's underlying Community Commercial land use...by the Van Nuys–North Sherman Oaks Community Plan;

**No definition, enumeration, or quantification of "consistent with" or "Community Commercial" (rather than "neighborhood serving") is provided in the DEIR, and therefore no proposed development would appear to meet this stated objective.**

**Revise the DEIR and include the adequately defined, enumerated, and quantified objectives herein and use for the development of adequate alternatives and their comparisons, including a more comprehensive specific corridor plan.**

☐ Enhance the Project Site's walkability and public accessibility through the introduction of street-fronting neighborhood-serving commercial uses, and new plazas and walkways that connect with the LA Riverwalk;

**The existing and proposed frontages cannot be considered as "street-fronting" compared to the more typical street-fronting commercial uses found throughout the Valley.**

**No definition, enumeration, or quantification of "walkability and public accessibility" is provided in the DEIR, and therefore no proposed development would appear to meet this stated objective.**

☐ ~~Retain...~~

☐ Provide vehicle and bicycle parking that satisfies anticipated demand on the Project Site with direct access to the proposed residential and commercial uses, existing office uses and the LA River walk; and

**No definition, enumeration, or quantification of "satisfies" and "anticipated demand" is provided in the DEIR, and therefore no proposed development would appear to meet this stated objective.**

**Physical description and analyses are not provided for the Project's incorporation and impacts from/on the River Walk.**

**Revise the DEIR and include the adequately defined, enumerated, and quantified objectives herein and use for the development of adequate alternatives and their comparisons, including a more comprehensive specific corridor plan.**

☐ Provide a sustainable development consistent with principles of smart growth...sustainable design features, mixed uses, infill development, and walkability.

**No definition, enumeration, or quantification of "sustainable development, principles, smart growth...sustainable design features, and walkability" is provided in the DEIR, and therefore no proposed development would appear to meet this stated objective.**

**Revise the DEIR "project objectives" entirely and include the adequately defined, enumerated, and quantified objectives herein and use for the development of adequate alternatives and their comparisons, including a more comprehensive specific corridor plan.**

**Exsum I-2/2** The City determined through the Initial Study...would not...cause significant impacts related to...geology and soils....

**Brogin Co's. Brogin Co's. scoping comments 072814/p.3 (Apdx. A-3, p.112/5) Earthquakes - NR damages to commercial properties. From search of: <http://scedc.caltech.edu/eq-catalogs/> Major seismic damages occurred in Sherman Oaks due to seismic wave focusing/exaggeration from the underlying bedrock slopes beneath the Project area, but no consideration was given to such effect of**

**geology and soils on the Project. 17 measureable earthquakes have been recorded with 2 miles of the Project while the Northridge Earthquake occurred at 6.8mi NW of the Project with strengths of 0.99-3.35 RM and depths of <5000 - <50,000 feet below the Project. These data are available but were not mentioned nor analyzed in the scoping or DEIR.**

**Similarly, more complex site response/amplification and liquefaction models for earthquake damage have been conducted for part of the southern San Fernando Valley but not mentioned in the DEIR. Efforts are underway to develop fault/fold models for surface site effects related to structural focusing of earthquake energy to the surface from underlying geologic structures but were not mentioned in the DEIR ([http://www.aegsc.org/chapters/centralcoast/pdf/september\\_2005\\_abstract.pdf](http://www.aegsc.org/chapters/centralcoast/pdf/september_2005_abstract.pdf); USGS research scientists July 2005 ~ AEG NEWS 48 (Program with Abstracts) 87.)**

**Revise the DEIR "geology and soils" setting and assessments entirely and include the adequately defined, enumerated, and quantified analyses therein and use for the assessment of impacts on a more comprehensive specific corridor plan.**

**4.D-21/2 3. Project Impacts a. Methodology** The Historical Resource Assessment is based, in part, on historic permits for the Project Site, Sanborn Fire Insurance maps, historic photographs, aerial photos and site plans, local histories, and California State Historic Resources Inventory for Los Angeles County.

**Research**

Primary and secondary source materials were consulted for the development of applicable historic contexts. For a complete list of sources, please see bibliography. Sources generally included:

Appdx. 4/1 • Aerial photographs

**References in settings and impacts to aerial photos render these sections totally inadequate and incomplete by the absence of known and widely used US Army Air Service aerial photos of LA in 1923 and 1928 (EDR, 2016) which may or may not confirm the review of valuable historic land uses of the project site.**

**Revise the DEIR and include the adequately reviewed historic aerial photos. Revision must be included both for Cultural Resources and for Hazards and Hazardous Wastes (e.g., agricultural pesticides and ground contamination).**

**4.E-42/3** The **feasibility** of an infiltration system within the Project Site was **evaluated** and it was **determined** that based on the Project Site underlying soil conditions (i.e., expansive soils), infiltration would not be **feasible** within the Project Site. The Project would...rainwater harvesting system to capture **some of the volume** of potential runoff and reuse it for irrigation purposes, thereby reducing the volume of water and potential pollutants leaving the Project Site and entering into the storm drain system.

**Revise the DEIR and include documentation for the lack of infiltration systems for the required stormwater collection and detention systems. Provide a thorough "evaluation" and "determination" "systems" for infiltration and irrigation systems, including a complete capital and operation/maintenance costs/benefit analyses. Provide preliminary engineering designs, flowcharts, and layouts.**

**6-13/2** The diversity of uses...support the City's **housing needs** and enhance the **employment** base of the Van Nuys—North Sherman Oaks area....foster **continued economic investment** in the **area** while meeting the **needs of local residents**....would also **attract new businesses to the area**,...continue to provide office and desirable **employment opportunities** to the **community**.

**6-19/4 d. Conclusion** Overall, the Project would be consistent with the **growth forecast for the City of Los Angeles Subregion** and would be consistent with **regional policies** to reduce **urban sprawl**, **efficiently utilize existing infrastructure**, reduce **regional congestion**, and improve air quality through the reduction of vehicle miles traveled.

**No definition, enumeration, or quantification of numerous terms (see above) is provided in the DEIR and therefore the public cannot be expected to provide reasonable review and comment regarding the development and local effect to meet these "targets".**

**References to economics, businesses, investments, "area" or "community" or "local", etc. render the section totally inadequate and incomplete without the publicly access definitions, delineation, and quantifications, required by CEQA and common sense and reason which may or may not confirm the review of valuable aspects of the proposed project.**

**Revise the DEIR and include the adequately described social/economic/employment evaluations to support such claims. Revision must be included in all sections and a socio-economic section must be provided, perhaps along with Growth Inducements.**

#### **THE F...WORD**

**5-3/1** According to the CEQA Guidelines,...detailed consideration is the alternative's failure to meet most of the basic project objectives, the alternative's infeasibility, or the alternative's inability to avoid significant environmental impacts. Alternatives to the Project that have been considered and rejected as infeasible include:

**No feasibilities/infeasibilities has been defined nor quantified, especially economically, and generally is not acceptable for state compliances, e.g., CEQA.**

**Therefore the DEIR must be withdrawn, revised, and recirculated with adequate and complete definition, enumeration, and quantifications to provide adequate and complete basis for any statements with the "F...Word"**

**5-4/2** Based on the above, an alternative site is not considered feasible as it is not expected that the Project Applicant can reasonably acquire, control or have access to a suitable alternative site that..., this alternative was rejected from further consideration.

**6-8/3** No feasible noise barrier

**6-10/1** No feasible mitigation measures...could be implemented...

**6-10/2** There are no feasible mitigation measures...

**6-14/2** Among those alternatives, no feasible alternative was identified that would eliminate all of the Project's significant and unavoidable impacts with the exception of the No Project Alternative.

**6-14/2** ...No Project Alternative would avoid all of the Project's significant environmental impacts...would not meet the underlying purpose of the Project or any of the Project objectives, and is not considered a feasible development alternative.

**6-14/2** ...numerous mitigation measures that reduce the potential impacts associated with the Project to the extent feasible.

**Feasibilities/infeasibilities have not been defined nor quantified, especially economically, and generally such usage in a DEIR is not acceptable for state compliances, e.g., CEQA.**

**Therefore the DEIR must be withdrawn and revised and recirculated with adequate and complete definition, enumeration, and quantifications to provide adequate and complete basis for any statements with the "F...Word"**

**6-14/2** Although the No Project Alternative would avoid the Project's significant and unavoidable cumulative impacts...and create a significant unavoidable land use impact.

**6-14/2** ...Project...satisfies the Project objectives to a substantially greater degree than any of the proposed alternatives.

**No definition, enumeration, or quantification of "satisfaction" for any objective has been provided in the DEIR.**

**Cumulative impacts are mentioned in context of the Project but are not defined or specified.**

**Attribution of "Unavoidable land use impact" to "No Project" indicates that the current project site is not consistent with land uses, planning, and/or codes.**

**Revise the DEIR "project objectives" and the alternatives comparisons entirely and include the adequately defined, enumerated, and quantified comparisons of objectives for adequate alternatives, including a more comprehensive specific corridor plan.**

**6-14/2** ...Project presents several benefits that counterbalance the limited adverse effects...on the environment.

**The "limited adverse effects" do not appear to be objectively reviewed compared to earlier statements: "Project's significant and unavoidable cumulative impacts" and "create a significant unavoidable land use impact".**

**Revise the DEIR.**



**6-14/2** ...No Project Alternative would avoid all of the Project's significant environmental impacts...would not meet the underlying purpose of the Project or any of the Project objectives, and is not considered a feasible development alternative.

**No "underlying purpose" has been stated in the DEIR nor have objectives been shown to be related to or derived from such a Goal or Purpose.**

**Revise the DEIR.**

**4.F-28/Tab F-1 ...extent feasible... -34/3; -38/F-2; -41/F-2; -55/1**

**Revise the DEIR.**

**4.E-7/3** (ii) Operation In accordance with Section 402(p) of the Clean Water Act, municipal NPDES permits prohibit the discharge of non-stormwater except under certain conditions and require controls to reduce pollutants in discharges to the maximum extent practicable. Such controls include BMPs, as well as system, design, and engineering methods. A municipal NPDES permit has been issued to the County and 84 incorporated cities. The Los Angeles County Municipal NPDES Permit requires implementation of the Storm Water Quality Management Program prepared as part of the NPDES approval process.

**No calculations or designs are provided to document the gathering, detention, and treatment of stormwater nor its reuse for irrigation or discharge as a water feature to River Walk and the LA River.**

**No calculations or designs are provided to document the discharge of treatment residuals from stormwater.**

**Revise the DEIR.**

**4.E-42/3** Under existing conditions, there are no stormwater runoff treatment devices on-site and most runoff from the Project Site is discharged without any controls. As part of the SUSMP...with LID requirements, the Project would implement BMPs to reduce the quantity and improve the quality of rainfall runoff from the overall Project Site,...associated with storm events up to the 0.75-inch precipitation level. BMPs would include...Infiltration is considered the first priority type of BMP...The feasibility of an infiltration system within the Project Site was evaluated and it was determined that based on the Project Site's underlying soil conditions (i.e., expansive soils), infiltration would not be feasible within the Project Site.

The Project would however include...capture some of the volume of potential runoff and reuse it for irrigation purposes, thereby reducing the volume of water and potential pollutants leaving the Project Site and entering into the storm drain system.

**This statement clearly shows that the project does not comply with the requirements of the LID.**

infiltration rates and poor permeability. Proposed water wells or recharge activities (i.e. site infiltration trench BMP) shall require a site percolation test prior to construction, however are not likely to be deemed feasible due to the on-site geotechnical investigation's report of expansive soils. No permanent groundwater extraction or dewatering systems are proposed as part of this project.

Apdx.D - 14/1

**No such report, the 2010, is available; no reference and not included in list as geotechnical investigation.**

**As the only reference is not available for public review, any reference is useless and renders the DEIR section and appendix as totally inadequate or incomplete.**

runoff via biofiltration planters or basins. Preliminary feasibility studies of potential BMPs show infiltration is likely infeasible due to existing expansive soils on-site. A proposed BMP strategy of rainwater harvesting (capture and use) for irrigation purposes shall retain a required mitigation volume of runoff (generated by a 0.75-inch, "first flush" storm event). Further discussion of operational mitigation strategies can be found in the project's "Surface Water Quality Study" report.

Apdx. D 20/3

**No backup for "Feasibility/infeasible" and for pollutants arising from "First flush" stormwater.**

4.E-38/1 Residual soil and/or groundwater impacts remain beneath the subject property; however, based on previous environmental investigations and remedial confirmation sampling results the residual concentrations of petroleum hydrocarbons do not represent a significant threat...Therefore,...former underground storage tanks on-site are no longer considered a recognized environmental condition. ***No references are provided for investigation or sampling or threat, or recognition. Revise the DEIR.***

**5-138/1** F. Environmentally Superior Alternative Section...indicates that an analysis of alternatives to a project shall identify an Environmentally Superior Alternative among the alternatives...Guidelines also state that should it be determined that the No Project Alternative is the Environmentally Superior Alternative, the EIR shall identify another Environmentally Superior Alternative among the remaining alternatives.

/2 With respect to identifying an Environmentally Superior Alternative among those analyzed..., the range of feasible alternatives includes Alternative 1...Alternative 5,...

...the Project would result in significant and unavoidable impacts with regard to: on-site noise and vibration (...human annoyance) during construction; off-site vibration (...human annoyance) during construction; and intersection levels of service during operation.

***An Environmentally Superior Alternative must be considered as one including a Specific Plan Corridor for Riverside Drive.***

In addition,...result in significant and unavoidable cumulative impacts related to: on- and off-site noise during construction; off-site vibration...during construction; and intersection levels of service during operation.

...No Project Continued Operation of Existing Sunkist Building Alternative, would avoid all of the significant and unavoidable impacts....also reduce all of the Project's less-than-significant impacts...would ***not meet***...'s ...= create a high-quality, mixed-use development that provides new housing opportunities that are integrated with neighborhood-serving commercial and 139/1 significant unavoidable land use consistency impact by continuing the existing conflict between the P-1L-RIO and PB-1L-RIO zoning and the property's Community Commercial land use designation.

***An Environmentally Superior Alternative must be considered as one including a Special Assessment District for the for Riverside Drive Plan Corridor.***

---

From: **Adrian Fine** <[afine@laconservancy.org](mailto:afine@laconservancy.org)>

Date: Thu, Sep 22, 2016 at 1:21 PM

Subject: ICON Sherman Oaks (Sunkist Headquarters Building), Draft Environmental Impact Report (ENV-2014-1362-EIR)

To: "[sarah.molina-pearson@lacity.org](mailto:sarah.molina-pearson@lacity.org)" <[sarah.molina-pearson@lacity.org](mailto:sarah.molina-pearson@lacity.org)>

Cc: Julia Duncan <[julia.duncan@lacity.org](mailto:julia.duncan@lacity.org)>, Ken Bernstein <[ken.bernstein@lacity.org](mailto:ken.bernstein@lacity.org)>

**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](mailto: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). Attached are the Conservancy's comments.

Thank you and best, Adrian

**Adrian Scott Fine**  
**Director of Advocacy**  
Los Angeles Conservancy  
523 West Sixth Street, Suite 826  
Los Angeles, CA 90014  
[\(213\) 430-4203](tel:(213)430-4203)

[laconservancy.org](http://laconservancy.org)  
[E-News](#) – [Facebook](#) – [Twitter](#) – [Instagram](#)

**Membership starts at just \$40**  
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September 22, 2016

523 West Sixth Street, Suite 826  
Los Angeles, CA 90014

213 623 2489 OFFICE  
213 623 3909 FAX  
[laconservancy.org](http://laconservancy.org)

**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](mailto: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](mailto: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



---

From: **Marshall Long** <[mlacoustics@sbcglobal.net](mailto:mlacoustics@sbcglobal.net)>  
Date: Mon, Sep 26, 2016 at 5:50 PM  
Subject: ICON EIR  
To: Sarah Molina-Pearson <[sarah.molina-pearson@lacity.org](mailto:sarah.molina-pearson@lacity.org)>  
Cc: Richard Close <[Rclose@gilchristutter.com](mailto:Rclose@gilchristutter.com)>

Dear Ms Molina-Pearson

Please find attached a letter summarizing our comments on the Sunkist ICON project EIR in Sherman Oaks, CA. I would appreciate it if you could acknowledge receipt of this transmission.

Best regards,

Marshall Long, Ph.D, P.E., FASA

**Officers**

*President*  
Richard H. Close  
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Matt Epstein  
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Marshall Long  
Jay Weitzler

September 26, 2016

City of Los Angeles  
Department of City Planning  
Environmental Analysis Section  
City Hall  
200 N. Spring Street, Room 750  
Los Angeles, CA 90012

Draft Environmental Impact Report (DEIR)  
Van Nuys North Sherman Oaks Community Plan Area  
ICON Sherman Oaks Project  
Case Number ENV-2014-1326-EIR  
Project Location 14130 Riverside Drive, Sherman Oaks, CA 91423

Sherman Oaks Homeowners Association (SOHA) Comments on the DEIR:  
We enclose comments on selected sections of the DEIR organized by section.

**Air Quality**

The proposed project is located close to the 101 Freeway in the area euphemistically referred to as the "black lung zone". The impact of the air quality condition is assessed by comparing the density of the harmful gasses or particulates in the air to standards set by the state and federal government. According to the DEIR the amount of particulate matter generated by traffic along the freeway exceeds the state standards. The suggested mitigation measures include inoperable windows on the south side of property and the installation of MERV 13 filters on the return air ducts of the HVAC system.

These filters are rated according to the size of contaminant they block. The filters are only effective for particles and not for poisonous gasses, whose molecules are about 1000 times smaller. According to the DEIR the level of CO, CO<sub>2</sub>, and NO<sub>x</sub> gasses do not exceed the standards so filtering can be effective. However there are several problems with this approach. First, air pollution can enter a unit via open windows and doors on any side of the building, so units on all sides of the building should be protected. Second, mechanical ventilation systems must have a certain percentage of "fresh" outside air introduced into the return air ducts downstream of the return air registers where the filters are located. Therefore this



outside air is unfiltered and its introduction allows dirty air to be fed into the air handling unit and blown into the homes via the supply registers.

The MERV 13 filters are available in thicknesses that vary from 1 to 5 inches. The thicker filters are more effective since they have more surface area to collect and store the harmful particulate matter. The thin filters can clog up more quickly and reintroduce particles back into the homes. Filters must be inspected at least once a month and be replaced when they are dusty, damaged, or bypassed, which could be as often as every 30 days. Thus the developers are relying on the occupants to do this inspection and maintenance. Since the filters can cost \$30 to \$60 dollars apiece this introduces a financial burden on the tenants, who are unlikely to remember to inspect their systems. The developer must instruct tenants and owners of these obligations.

## **Traffic**

Traffic in the area is heavy, with a combination of residential and commercial uses particularly at rush hours and during the holidays, due to the proximity of the site to the large Fashion Square shopping center. The DEIR has analyzed the traffic impacts by looking at the level of service (LOS) ratios at various intersections in the neighborhood. The level of service is a ratio of the actual volume of traffic divided by the street capacity for a street segment or intersection according to the traffic flow direction and the time of day. According to this ratio a letter grade, A (good) to F (very bad), is assigned to the location.

Environmental impacts are assessed both by the absolute grade associated with a location as well as the change in the LOS both within a grade range as well as at a change in grade. The comparisons are made for a) the existing condition, b) the existing condition plus the change in traffic due to the project, and 3) the existing condition plus traffic due to all other projected projects, and 4) existing condition plus the projected traffic plus the project generated traffic. Impacts are judged by comparing 3) to 4). The threshold for determining an impact is either a change in the LOS or a threshold of LOS value within a range, which can be as low as 1% to 4%. Most of the project driven impacts were at the intersections, for example Hazeltine and Riverside (AM LOS of D, and a PM LOS of C) and at Woodman and Riverside (AM LOS of F, and PM LOS of E). Also affected are the 101 on and off ramps at Woodman, NB (AM D and PM D) and SB (AM D and PM D). Another affected intersection is Fulton and Riverside, (AM D, and PM E).

One major difficulty with this analysis is that the Chase Knolls expansion project north of Riverside between Sunnyslope and Fulton, a few short blocks east of the project, has been ignored. There the property owner has proposed to build 6 three-story buildings and an additional 141 units. These will increase traffic on the streets just blocks east of the Sunkist project and will undoubtedly change the LOS ratings.

## **Noise**

High noise levels now impact the site and will continue and even increase. There are two methods of assessing impact, and absolute level and a change in level. Absolute levels to judge impact can be determined by comparing them to standards published in the State of California General Plan Guidelines, which are required of every city and county in the state. These are reproduced as Table IV G-2 in the DEIR. They list four categories of acceptability according to the land use and noise level. A copy of these standards is attached.



The table is also included in the DEIR in an altered form that is misleading. Rather than showing a range of noise levels, it shows one number for each category that can be interpreted as a maximum or a minimum. These noise levels are measured using the Community Noise Equivalent Level (CNEL), a 24 hour energy average level with levels occurring between 7 pm and 10 pm increased by 4.8 dBA and between 10 pm and 7 am the next day by 10 dBA before averaging. The evening and nighttime penalties are due to the increased sensitivity of people to noise during these hours.

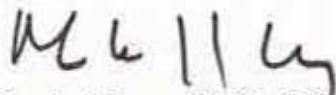
Based on 24 hour measurements taken on top of the existing Sunkist building adjacent to the 101 freeway the existing ambient at that location is 81.6 dBA CNEL. This CNEL level is louder than the published aircraft generated levels at the west end of the runways at the Los Angeles Airport. It places the existing and future buildings in the Clearly Unacceptable category, which prohibits new construction of new single and multifamily residential. It also falls into the Normally Unacceptable category for office building construction.

Based on the normal 3 dB per distance doubling falloff rate, the Clearly Unacceptable residential zone extends out 1,150 feet from the centerline of the 101 freeway, without consideration of shielding from the existing structure. The DEIR's response to this prohibition is to claim that it will all be worked out by implementation of noise insulation features in the final building design. This ignores the fact that the ordinance flatly prohibits the construction of residential units in this noise zone. In addition the LA Department of Building and Safety has never enforced the state requirements on the control of interior noise in multifamily residential dwelling units since the passage of these requirements in 1974. If by some miracle they started enforcing it now they would have no one in the department with the technical knowledge necessary to review the required reports.

The second type of standard used to evaluate the project's noise impact is the change in level due to traffic generated by this project and others in the area. The standard used in the DEIR is a change of 3 dBA in the traffic generated noise level. It takes a doubling of the traffic volume, or a 100% increase, to generate this change in noise level. This is in stark contrast to the 1% to 4% standard used in the traffic study to produce a finding of a significant impact. Thus the standards used in the noise and traffic impact assessment differ by a factor of as much as 100. With this lax a standard it is no surprise that there was no finding of a noise impact.

In spite of the weak standards, the DEIR did not analyze the noise due to refrigerated delivery trucks idling near the loading docks, nor did it analyze the large roof mounted refrigeration units necessary to cool the storage units in the market. Also ignored were the grease hood exhaust fans required in every restaurant. These are generally roof mounted and could affect the residential tenants as well as the neighbors in the area. Also ignored was the fixed HVAC equipment required to heat and cool the proposed buildings.

Respectfully submitted,



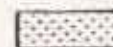
Marshall Long, Ph.D., P.E., FASA  
SOHA Land Use Chair



## LAND USE COMPATIBILITY FOR COMMUNITY NOISE ENVIRONMENTS

LAND USE CATEGORY	COMMUNITY NOISE EXPOSURE L <sub>dn</sub> OR CNEL, dB					
	55	60	65	70	75	80
RESIDENTIAL - LOW DENSITY SINGLE FAMILY, DUPLEX, MOBILE HOMES						
RESIDENTIAL - MULTI-FAMILY						
TRANSIENT LODGING - MOTELS, HOTELS						
SCHOOLS, LIBRARIES, CHURCHES, HOSPITALS, NURSING HOMES						
AUDITORIUMS, CONCERT HALLS, AMPHITHEATRES						
SPORTS ARENA, OUTDOOR SPECTATOR SPORTS						
PLAYGROUNDS, NEIGHBORHOOD PARKS						
GOLF COURSES, RIDING STABLES, WATER RECREATION, CEMETERIES						
OFFICE BUILDINGS, BUSINESS COMMERCIAL AND PROFESSIONAL						
INDUSTRIAL, MANUFACTURING UTILITIES, AGRICULTURE						

### INTERPRETATION



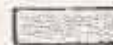
#### NORMALLY ACCEPTABLE

Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction, without any special noise insulation requirements.



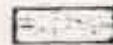
#### CONDITIONALLY ACCEPTABLE

New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features included in the design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning will normally suffice.



#### NORMALLY UNACCEPTABLE

New construction or development should generally be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made and needed noise insulation features included in the design.



#### CLEARLY UNACCEPTABLE

New construction or development should generally not be undertaken.

### CONSIDERATIONS IN DETERMINATION OF NOISE-COMPATIBLE LAND USE

#### A. NORMALIZED NOISE EXPOSURE INFORMATION DESIRED

Where sufficient data exists, evaluate land use suitability with respect to a "normalized" value of CNEL or L<sub>dn</sub>. Normalized values are obtained by adding or subtracting the constants described in Table 1 to the measured or calculated value of CNEL or L<sub>dn</sub>.

#### B. NOISE SOURCE CHARACTERISTICS

The land use-noise compatibility recommendations should be viewed in relation to the specific source of the noise. For example, aircraft and railroad noise is normally made up of higher single noise events than auto traffic but occurs less frequently. Therefore, different sources yielding the same composite noise exposure do not necessarily create the same noise environment. The State Aeronautics Act uses 65 dB CNEL as the criterion which airports must eventually meet to protect existing residential communities from unacceptable exposure to aircraft noise. In order to facilitate the purposes of the Act, one of which is to encourage land uses compatible with the 65 dB CNEL criterion wherever possible, and in order to facilitate the ability of airports to comply with the Act, residential uses located in Com-

munity Noise Exposure Areas greater than 65 dB should be discouraged and considered located within normally unacceptable areas.

#### C. SUITABLE INTERIOR ENVIRONMENTS

One objective of locating residential units relative to a known noise source is to maintain a suitable interior noise environment at no greater than 45 dB CNEL or L<sub>dn</sub>. This requirement, coupled with the measured or calculated noise reduction performance of the type of structure under consideration, should govern the minimum acceptable distance to a noise source.

#### D. ACCEPTABLE OUTDOOR ENVIRONMENTS

Another consideration, which in some communities is an overriding factor, is the desire for an acceptable outdoor noise environment. When this is the case, more restrictive standards for land use compatibility, typically below the maximum considered "normally acceptable" for that land use category, may be appropriate.

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From: <[rziff@shermanoaksnc.org](mailto:rziff@shermanoaksnc.org)>  
Date: Thu, Sep 15, 2016 at 2:38 PM  
Subject: Comments on DEIR  
To: [sarah.molina-pearson@lacity.org](mailto:sarah.molina-pearson@lacity.org)

Dear Ms Molina-Pearson-

The attached comments on the IMT Icon Project at 14130 and 14154 Riverside Drive ENV-2014-1362-EIR. These comments were approved unanimously by the Sherman Oaks Neighborhood Council Board on September 12, 2016.

Ron Ziff

1st Vice President and Acting President  
Sherman Oaks Neighborhood Council

## Sherman Oaks Neighborhood Council

PO Box 5721

Sherman Oaks, CA 91413

September 14, 2016

These Comments on ENV-2014-1362-EIR were approved September 12, 2016 by unanimous vote of the Sherman Oaks Neighborhood Council Board.

Ron Ziff

1st Vice President (Acting President)

### **Traffic Study:**

Concern about the accuracy of the traffic study (Appendix G) in particular:

How and why the DEIR would use a projected 2% ambient growth per year of traffic volume;

Why did the intersections studied in the DEIR not include intersections south of the Project Site such as Valleyheart/ Hazeltine; Milbanks/ Hazeltine, and Moorpark/ Hazeltine;

Further we are concerned the DEIR did not include intersections on the west side of Hazeltine.

The DEIR did not address the cumulative impacts of traffic sufficiently. We would like to have the DEIR review the use of a raised median on Hazeltine to prevent the south bound traffic from turning left into the Fashion Square service road immediately south of Bloomingdales.

Concern regarding the cross-traffic at the driveways, particularly the northern most driveway on Hazeltine and the proposal to add left turn access into the Project Site from north bound traffic on Hazeltine.

Concern about the cars exiting the same northerly driveway of IMT turning right (south) and conflicting with the southbound cars on Hazeltine & the right turns from Riverside.

We request a re-evaluation of the commercial traffic estimate because the traffic count at the much smaller grocery store across the street appears to be at least as great as the estimate for the new larger store.

### **Aesthetics:**

The Analysis of Project Impacts rationalizes the loss of open space as converting “the otherwise underutilized site into an active component of the community”.

Comment: There is a real loss that is not addressed. The community will no longer have the open space and mature trees that are a visual and environmental amenity to the surrounding area and those who pass through on the streets and freeway.



Further, it states that all improvements would be consistent with the Secretary of the Interior's Standards for historic rehabilitation and that "Buildings A, B and C would incorporate appropriate architectural design elements that would complement the unique architectural style of the Sunkist building by employing the modernist horizontality found in the existing Sunkist Building to achieve continuity and context."

Comment: The significance of the architecture of the Sunkist Building is its passive solar design as a response to the climate/environment of the San Fernando Valley; and is characterized by its inverted pyramidal form and its 3 dimensional sun shades. The architecture of the Sunkist Building is not characterized by modernist horizontal banding.

The discussion of views it states the new building will "frame, rather than overshadow the Sunkist Building" and though the new buildings would "narrow the view of the Sunkist Building" they would create view corridors.

Comment: The great strength of the Sunkist Building comes from its heroic sculptural presence, being seen in the round, not head on via view corridors.

#### **Alternatives:**

"An EIR shall describe a range of reasonable alternatives to the project...but would avoid or substantially lessen any of the significant effects of the project"

Alternative 1: No Project

Comment: We feel the community would approve this alternative.

Alternative 2: Residential Development in Accordance with Existing Zoning

Comment: Existing Zoning does not allow for structures along Calhoun and does not allow for above grade parking structures.

Alternative 5: Reduced Density and Square Footage

Comment: A Reduced Density Alternative should have the square footage based on something. We recommend basing the square footage on the amount of parking that is in keeping with the existing PB-1L zoning.

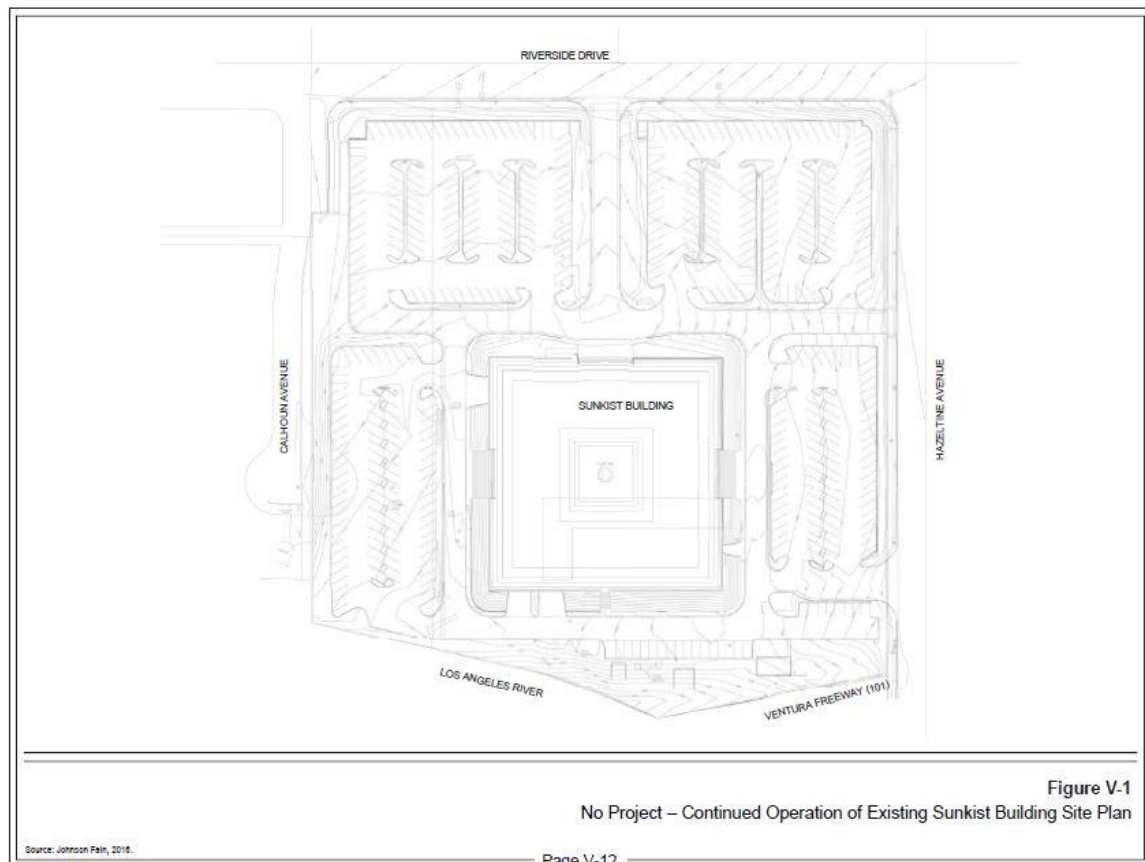
Comment: There is no Alternative showing a scheme based on the current zoning, a "by right" scheme.

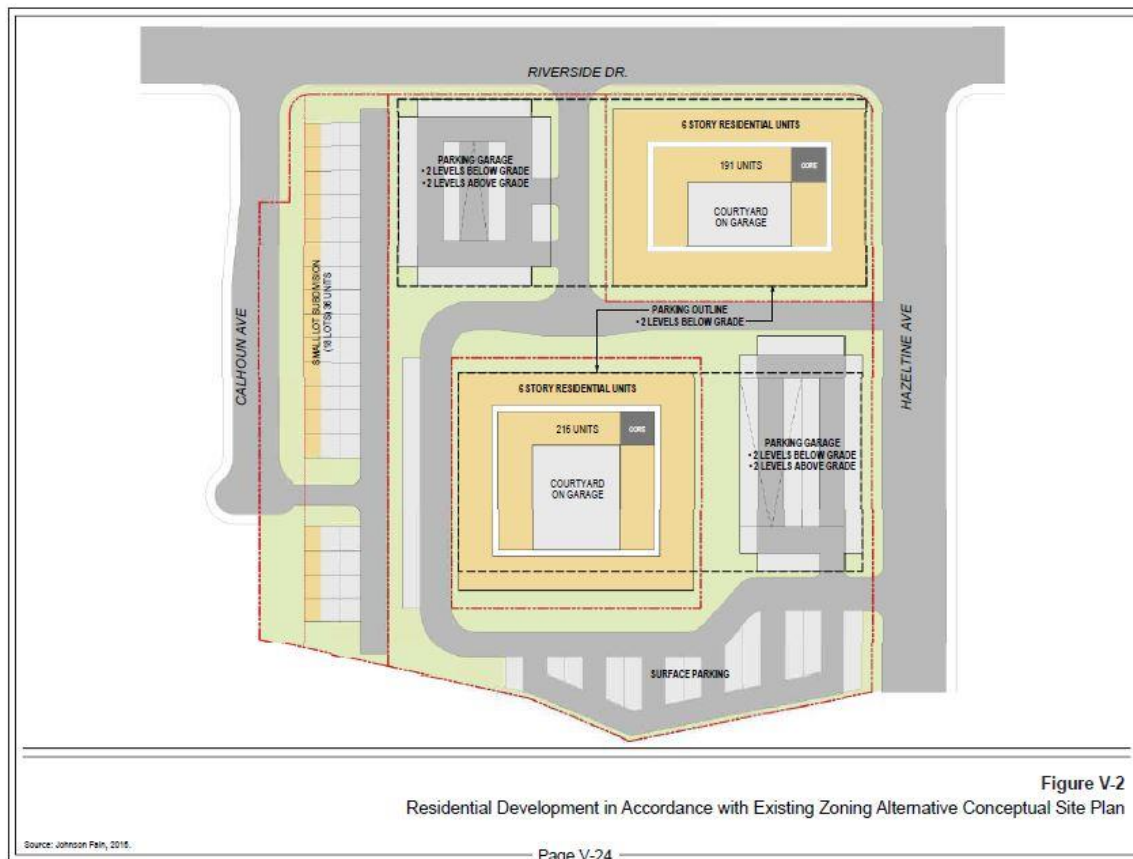
The current zoning allows for an increase in the development of the site. To properly understand the applicant's request the public needs to understand the difference between the requested development and what is currently allowed. The alternates should demonstrate conceptual differences, not just variations on the proposed project.

Comment: Concern regarding the access to the Project Site from the Los Angeles River may not be maintained, and that some of the Alternatives studied in the DEIR did not include maintaining the river access.

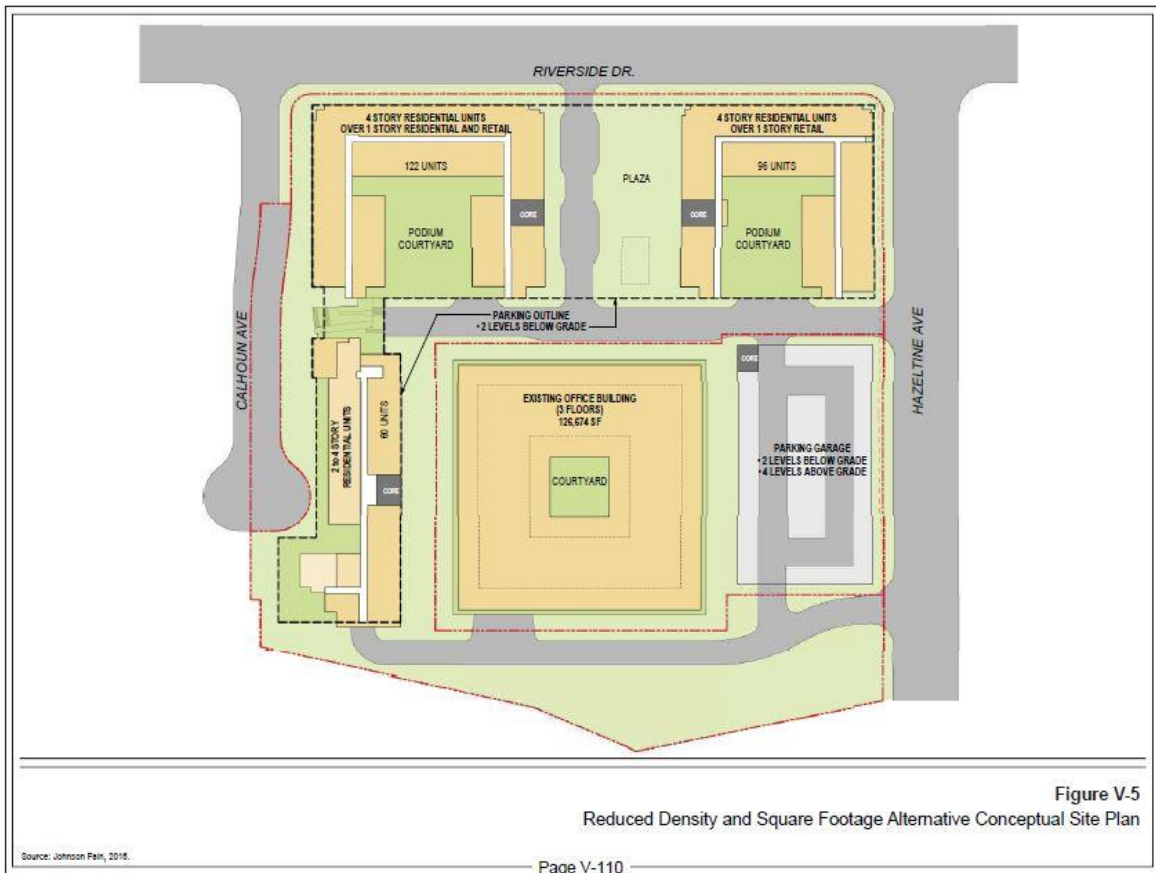
Proposed Alternative 6: Design a project that establishes the grade of the site at the elevation of the Sunkist Buildings entrance level. Tuck the parking under this new ground level and landscape the top as an open public space. Flip the “Plaza” shown in Alternative 5 to east along Hazeltine. The goal is to create a project with no visible above grade parking structure and an open space that allows public access to flow across the site from the L. A. River to the corner of Riverside and Hazeltine. Benefits to the community: a meaningful amenity in return for the impact of the development. Benefits to the development: creates the public access they propose away from the residential units giving the tenants their own “private” open space.

## ALTERNATE 1





ALTERNATE 2



ALTERNATE 5



**AERIAL VIEW**



**VIEW FROM HAZELTINE**



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From: **Genevieve Alexander** <[genalexander13@gmail.com](mailto:genalexander13@gmail.com)>  
Date: Tue, Aug 16, 2016 at 6:44 PM  
Subject: IMT Sunkist Building  
To: [sarah.molina-pearson@lacity.org](mailto:sarah.molina-pearson@lacity.org)

Hi Sarah,

I recently bought a house in Sherman Oaks and am concerned about the IMT Sunkist Apartment complex in development. At what point does our city step in and say enough is enough? We have enough congestion and IMT apartment developments in our neighborhood. It would be refreshing if our city supported home owners in protecting our neighborhood from excessive traffic, noise and overpopulation.

I ask that you get involved and assist our neighborhood in stopping this development. Let us know if there is anything we may do to stop this project.

Kind regards,  
Genevieve Alexander  
Sherman Oaks Homeowner

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From: **Genevieve Alexander** <[genalexander13@gmail.com](mailto:genalexander13@gmail.com)>  
Date: Fri, Aug 26, 2016 at 6:46 PM  
Subject: Case ENV 2014-1362-EIR ICON Sherman Oaks  
To: [cd4.issues@lacity.org](mailto:cd4.issues@lacity.org), [sarah.molina-pearson@lacity.org](mailto:sarah.molina-pearson@lacity.org)

Dear Councilman Ryu and City Planner Sarah Molina,

I am writing to ask for a 30 day extension for public comment on the DEIR for this project.

A concerned, tax paying Sherman Oaks homeowner,  
Genevieve Alexander

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From: **Vee Alexander** <[valex@sbglobal.net](mailto:valex@sbglobal.net)>  
Date: Fri, Aug 19, 2016 at 5:16 PM  
Subject: Please don't over populate Sherman Oaks!  
To: [sarah.molina-pearson@lacity.org](mailto:sarah.molina-pearson@lacity.org)

Dear Ms. Molina,

As a 14 year resident of Sherman Oaks, I am writing to express my opposition to IMT building 300 apartments, in addition to retail shops, at the Sunkist site on Riverside Drive. I use the Riverside/Haseltine intersection regularly and currently there is a long wait to turn left from Riverside onto Haseltine. This proposal will bring up to 600 more cars to our area. We know that will translate into worse air quality and more noise as well as snarled traffic.

Recently IMT has built 6 extremely large apartment complexes within the boundaries of Sherman Oaks. Our quality of life is at stake. I also object to the prospect of one gigantic building obscuring a classic piece of architecture, the landmark Sunkist building.

Trader Joes, across the street from this proposed site is already overcrowded. Just try to find a parking spot there at dinnertime!

Thank you for listening to the voices of residents who love this area and want to protect our quality of life.

Sincerely,

Virginia Alexander



This email has been checked for viruses by Avast antivirus software.  
[www.avast.com](http://www.avast.com)



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From: **vee alexander** <[veealexander@sbcglobal.net](mailto:veealexander@sbcglobal.net)>  
Date: Fri, Aug 26, 2016 at 10:31 PM  
Subject: Case No. ENV 2014-1362-EIR ICON Sherman Oaks  
To: [sarah.molina-pearson@lacity.org](mailto:sarah.molina-pearson@lacity.org)

Dear City Planner Sarah Molina-Pearson ,

I am writing you once again to express my concern about this project, involving 14130 and 14154 Riverside Drive, in Sherman Oaks. This time, I'm requesting at least a 30-day time extension for the public comment of the DEIR for this project.

As proposed, this potential project will bring nearly 300 apartments; nearly 40,000 square feet of commercial use; and over 7,000 square feet of restaurant and parking structures around the current Sunkist Building. This area is already full of traffic and very busy. If allowed to proceed in full, this project will dramatically change our area.

The Draft EIR, which discusses this project, is a huge report. Those who plan to bring helpful comments for your upcoming vote need more time to do the important work entailed in reviewing this entire document.

Please vote for at least a 30-day extension for public comment on this project.

Thank you,

Virginia Alexander

(14 year resident of Sherman Oaks)

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From: **Diane Bancroft** <[dianeesq@aol.com](mailto:dianeesq@aol.com)>  
Date: Tue, Aug 16, 2016 at 5:29 PM  
Subject: Against Sunkist project  
To: [sarah.molina-pearson@lacity.org](mailto:sarah.molina-pearson@lacity.org)

Please don't ruin the fashion square with yet another apt complex!!!

Sent from my iPhone

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From: **SOTalksNewsletter** <[sotalks4u@sbcglobal.net](mailto:sotalks4u@sbcglobal.net)>

Date: Fri, Aug 19, 2016 at 2:33 PM

Subject: Case No. ENV 2014-1362-EIR ICON Sherman Oaks 14130 and 14154 Riverside Drive, Sherman Oaks area, City of Los Angeles

To: "[cd4.issues@lacity.org](mailto:cd4.issues@lacity.org)" <[cd4.issues@lacity.org](mailto:cd4.issues@lacity.org)>, "[sarah.molina-pearson@lacity.org](mailto:sarah.molina-pearson@lacity.org)" <[sarah.molina-pearson@lacity.org](mailto:sarah.molina-pearson@lacity.org)>

Honorable Councilman Ryu and Ms. Molina-Pearson:

By this email, respectfully request a time extension for the review of the above DEIR. A thirty day extension, in my opinion, would be appropriate.

This is the first project of this size, proposed in this area, in nearly ten years. It is a very large project, with unique attributes, with a very large DEIR describing it.

While I do not represent the entire community, my family and I have lived in this community for 34 years.. I do believe that members of my family are among the few who have a background and experience in the assessment and review of such projects. We have found the review of the document to be cumbersome. Unfortunately, the more errors and misrepresentations there are in a document the longer it takes to review it and substantively prepared comments concerning its review.

The majority of people affected by this project, however, are unfamiliar with the technical documentation presented in the DEIR and are doing their best, at a minimum, to compare the technical representations of the project to what exists here.

For instance, people have found deficiencies in the traffic study, as well as the agreement with the City as to what was to be addressed in that document. That disconnect, for one, is of serious concern, since potential Traffic Impacts are one of the more troublesome issues concerning this project.

Any delays in the project processing, up to this time, have been due to the Proponent or some other influence. I do not believe that the community has stalled the process in any way. However, among all the entities that would suffer the most from the potential significant (and insignificant) environmental impacts of the project, it is the surrounding community.

Surely, at thirty day time extension, to assure a comprehensive disclosure and understanding of the impacts of the project, and the iteration of concerns, is consistent with the spirit of CEQA.

Thank you for your consideration of my request.

Very truly yours,

Wendy M. Brogin, AICP  
5043 Matilija Avenue  
Sherman Oaks, CA 91423  
[sotalks4U@sbcglobal.net](mailto:sotalks4U@sbcglobal.net)

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From: **SOTalksNewsletter** <[sotalks4u@sbcglobal.net](mailto:sotalks4u@sbcglobal.net)>  
Date: Sat, Sep 3, 2016 at 3:14 PM  
Subject: CITY CASE NO. ENV-2014-1362-EIR  
To: Sarah Molina-Pearson <[sarah.molina-pearson@lacity.org](mailto:sarah.molina-pearson@lacity.org)>

Dear Ms. Molina-Pearson:

I know a number of people, including myself, have requested a Time Extension for the Public Review and Comment on the above DEIR (SUNKIST/IMT).

I am reviewing the document as an affected party to this project. Kindly advise me if that Time Extension has been granted.

Thank you in advance for your response.

Wendy Brogin, AICP

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From: **SOTalksNewsletter** <[sotalks4u@sbcglobal.net](mailto:sotalks4u@sbcglobal.net)>

Date: Tue, Sep 27, 2016 at 3:18 PM

Subject: Comments on Sunkist/IMT DEIR, Nathan Brogin and Wendy Brogin, AICP

To: "[sarah.molina-pearson@lacity.org](mailto:sarah.molina-pearson@lacity.org)" <[sarah.molina-pearson@lacity.org](mailto:sarah.molina-pearson@lacity.org)>, "[cd4.issues@lacity.org](mailto:cd4.issues@lacity.org)" <[cd4.issues@lacity.org](mailto:cd4.issues@lacity.org)>

We are submitting cover letter and an approximately twenty page document representing our comments on the above DEIR

Do not hesitate to contact us if you any questions or comments with regard to this matter.

Sincerely,

Wendy and Nathan Brogin

# *Brogin Family*

5043 Matijja Avenue • Sherman Oaks, CA 91423

Email: [sotalks4U@sbcglobal.net](mailto:sotalks4U@sbcglobal.net)

## SENT BY EMAIL ONLY

September 27, 2016

Honorable David Ryu  
Councilmember 4<sup>th</sup> Council District

Ms Sarah Molina-Pearson  
Los Angeles City Planning Department

RE: SUNKIST/IMT MIXED USE PROJECT (SWC RIVERSIDE/HAZELTINE, SHERMAN OAKS  
ENV-2014-1362-EIR / SCH No. 2014071001  
PUBLIC COMMENTS FROM AREA RESIDENTS

Dear Councilmember Ryu and Ms. Molina-Pearson:

Although we have been involved in land use, planning, environmental, and zoning issues in the City and Country of Los Angeles for a combined nearly eighty years, we are submitting the attached comments as private citizens representing our views only on this project.

While the Applicant knew when the DEIR was going to be submitted and begin the 45 day Review Period, we did not. We had to fit this Review and our Comments within our own time schedule. We had requested a 30 day time extension for the comment period. However, 30 day extension was only granted.

Given the time limits and extensive comments to be made, for an extensive document that was unclear and weighted with unnecessary and incomplete information, we apologize for any typographical errors in this cover letter or attached document. We are readily available, therefore, at the above email address to respond to any inquiries that you may have about our comments.

We have resided at our home address for more than 34 years, where we have raised our children, participated in local activities related to our family life, as well as many activities to serve the public of this region, this State, and this Nation. It is from our professional and community service experience, as well as our residency in this area that we submit the attached comments.

We have both served as member of the Valley Economic Board (as charter members), as well as Board Members and Vice Chair (Nathan) of the Valley Industry and Commerce Association. We offer the following additional information about ourselves.

Nathan Brogin is by profession a licensed Real Estate Broker. However, additionally he has been Chair and Co-Chair of VICA's Transportation Committee, as well as serving on the SCAG Regional Transportation Committee, and others, as well as on the DTAC Committee for CalTrans. He was a significant influence in bringing the Orange Line, in its configuration to the San Fernando Valley including conceptually designing it Canoga Park extension. He was influential in also bringing the Red-line into the San Fernando Valley. He also was responsible for meter access improvements at the west/northbound Woodman/101 Freeway on-ramp, as well as recent signage regarding the intersection south of the 101 on Woodman. He also served on the last Zoning Appeal

Board that was seated for LA City, as well as having served on the South Planning Commission shortly after its inception. He had retired from these positions in recent years and stays active in non-planning oriented issues.

Wendy Brogin was formerly a professional level urban planner, and environmental, zoning, land use, and government consultant. She worked for the County of Los Angeles, primarily in the creation and review of environmental documents for the County from 1977 until 1984. She wrote many publication for the County regarding the CEQA process and implementation for the County. She also worked in the private sector until 1999, including the management of EIR documents for her clients, when she retired. She continues to participate informally in a variety of planning related activities.

She served on the Local Issues Committee of Los Angeles County, the New Motor Vehicle Board for the State of California, the Community Action Board for the City of Los Angeles, and earlier, Chair and Co-Chair of the Local Issues Committee of VICA.

We look forward to the opportunity to continue participating the review of this project. We do believe that an alternative project, better oriented to the site as well as the area in which it is located, and one that will not create significant impacts especially on Aesthetic resources and traffic is possible.

Thank you for your consideration of our comments.



Wendy M. Brogin, AICP



Nathan Brogin

Attachment: Public Comment on DEIR as cited above

PUBLIC COMMENTS  
ENV-2014-1362-EIR  
SCH No. 2014071001  
ALL OTHER IDENTIFICATION INFORMATION  
SUNKIST/IMT Mixed Use Project  
Prepared by Wendy M. Brogin, AICP and Nathan Brogin  
September 27, 2016

NOTE: Due to time limitations to review this DEIR, this document has not been edited as to punctuation and grammar, and maybe even content. Nevertheless, we remain available to respond to any inquiries regarding a need for clarification of any and all parts of this document. You may contact us by email at: [sotalks4U@sbclglobal.net](mailto:sotalks4U@sbclglobal.net) for any reason regarding this matter.

Additionally, we have read the Comments regarding this Document, submitted by the Sherman Oaks Neighborhood Council, and we concur with those comments.

In review of each section of the DEIR, we offer comments about the following Sections provided in the document.

#### **I. Executive Summary**

While CEQA states in Section “15123. SUMMARY, (a) An EIR shall contain a brief summary of the proposed actions and its consequences. The language of the summary should be as clear and simple as reasonably practical”, the Guidelines also suggest a limit to 15 pages. The importance of the “Executive Summary” is that often times, it is used as an introduction to the Project by decision makers and others who are reviewing and considering the setting, the project, the impacts of the Project, potential Mitigation Measures, and Alternatives to the Project.

It could be said that an overly long Executive Summary, such as that presented in this EIR in its 98 pages, is an unintended distraction to those who would attempt to read and understand the document and understand the project and relevant CEQA discussions about the project.

Furthermore, it is disheartening when an Executive Summary is so cumbersome yet, it misses information that is key to disclosing the CEQA mandated information in the DEIR to the Decision-Maker, Lead Agency, Responsible Agency, Agencies and Organizations with Interest, the Public (hereinafter “the Reader”).

There is a substantial amount of information that should not have been included in the document, while the following information should have been included in the document, to be set in the correct order by the respondent to these comments:

1. Objectives of the project (which sets a framework for the goals of the project).
2. A reference to and a discussion the body of the document concerning Geotechnical Impacts. The site, according to on-line site, ZIMAS, is located approximately 3 miles from the Hollywood Fault; this is a known “Earthquake Induced Liquefaction Area”, not allow by reference, but also evidenced by the significant damage of properties located north and south of the Los Angeles River Channel, in that area, in the 1994 “Northridge Earthquake.” Damage to that site and nearby areas should be readily available to the EIR preparer.
3. All the addresses for the site, which is readily available on ZIMAS, should be listed for the property, since they disclose development and other activities that have occurred on the site within the limits of record references on ZIMAS.
4. There should be a discussion of Existing Project site setting, to include photographs from the street of surrounding land uses, as well as the segment of the Area Plan for those properties, which is easily obtainable. The reliance on Aerial Photos to show the site and surrounding areas does not adequately disclose the information needed by a Reader to make a decision about the project. Nevertheless, the existing traffic patterns should be placed as a layer on an Aerial Map of a scale where it can be read and understood.
5. A legible site plan of the existing site should be provided, including measurements of existing improvements on site, and directions of current driveways and access driveways.



6. Photographs of the site, taken from the street of all four sides of the property, should be provided to demonstrate the characteristics of the site, including the mature trees and other vegetation that make the site a bucolic place, as well as the architectural significance of the existing Sunkist Headquarters building which is not only about the very unusual structure, but also, the unique impression of the building sitting on what would appear to be “open” land.

7. It should be noted that for later reference in the discussion of the potential impacts associated with the project, it states, “Pedestrian access to the Project Site is available via sidewalks surrounding the Project Site...” The proposed Mitigation Measure, to create and construct a new right turn only lane, at the Southwest Corner of Hazeltine and Riverside, will obstruct pedestrian access to the site as well as walkability passed the site of other pedestrians.

8. There is no discussion of the telecommunications antennas believed to be located on the existing Sunkist Building, as installed among other permits, Building Permit 03016-10000-1544. If these antennas do still exist, what will be their status at project completion?

9. How many people will be expected as well as their age range, and the income orientation of the units? The importance of this information relates to a variety of issues including: Utilities, Public Services, Transportation, and others, and even to determine the necessity of the project to meet area housing demands.

10. A legible site plan should be included, displaying measurements such as setbacks, proposed driveways and directions, and the relationship of the project to adjoining uses and activities, including traffic patterns (e.g., relationship of left turn into the site, from northbound Hazeltine, and its relationship with the existing turn pockets, serving northbound Hazeltine to westbound Riverside traffic, and southbound Hazeltine traffic seeking to enter the south entrance to the Fashion Square Parking Structure to the east of the site. In addition, the distance from the retail/restaurant space to the parking structure serving those uses should be shown on that site plan. There is a serious concern about the practicality of the location of the parking structure to those uses.

11. The “b. FAR and Setbacks” discussion should include a comparison of the proposed setbacks to what exists today at the site, as well as how it compares to nearby uses.

12. The “c. Access, Circulation, and Parking” should include, as should other parts of the document, a disclosure regarding the provision of “Guest Parking” for people visiting the residential segments of the property. Given that with development of the project, off-site parking abutting the site will be removed; on-street parking that is available is located a substantial distance from the property, including requiring crossing a Major Highway, and is consumed by other uses; that there is limited safe bike access to the site and the public transportation to the site is severely limited, and that the use of the latter two forms of transit to and from the site will be negligible; it is likely that conformance with the City Code for provision of Guest Parking will be inadequate for this site. Without adequate numbers and distribution of Guest Parking Spaces, significant impacts will occur in terms of off-site parking issues and there are potential safety issues as guest attempt to access to and from spaces located on the north side of Riverside Drive.

13. Will there be charges for parking for Employees of the Office and Retail Spaces, and/or for the people who use the commercial (market) or restaurant?

14. In determining that the project provides parking spaces in excess of what is required by the LAMC, how is that calculated? In determining the number of spaces that would be required under the LAMC, are optional parking credits being given for the provision of bicycle parking spaces that are going to be provided; are credits being given for reliance on a public transit system that will have nominal use by residents and that is not supposed to be credited as well as a TDM, for this project? In addition, where is the parking allocated for visitors cannot ride or walk to the LA River plaza on the south side of the site?

15. In “d. Landscaping, Open Space and Recreational Amenities” it should be disclosed whether residents of Buildings A and C will have use of the swimming pool and spa to be located on top of Building B. That information would help to determine the impacts of Recreation by residents of those two buildings if they are not able to use the property’s pool and spa.

16. Language in potential Zone Changes implied it would “allow...and ground floor commercial/retail uses in Buildings including A, B, and C.” Either this reference is incorrect, or the Zone Change should be suffixed to prevent commercial/retail uses in Building B and C.

17. The “Master CUP” discussion should be expanded to show where are the likely locations of the commercial alcohol consumption as well as the hours of operation.

18. The "Summary of Alternatives" may require modification to insert new Alternatives as well as Alternatives provided in the Traffic Report, which were not discussed in the body of the DEIR.

19. Does any portion of the site come under the requirements of a Commercial Corner per the LAMC? If it does not, please explain why.

20. Given that "Q" conditions have been placed on other projects in this area, explain the reasoning for not having "Q" conditions placed on the Project.

20. The various discussions of the individual factors discussed in the "Executive Summary" may be changed due to the implementation of corrections and changes made to the body of the DEIR because of this Public Review process.

## II. Project Description

1. Stating that these "new uses would be integrated with the existing Sunkist Growers, Inc headquarters building" should be clarified so that the reader does not believe that the building will be continued to be used as the headquarters of Sunkist.

2. Since they are mentioned, Figure 11-1 should be revised to show bus stops that provide public transit to the site.

3. In addition to the Aerial photo, ground level photos of the subject property, from all four sides, as well as, the surrounding uses (including multi-family residences, located east and west of the site along Riverside, and even on Hazeltine, north of Riverside, should be pictured.

4. The surrounding area is described as being "urbanized." While indeed the has urban services, the "atmosphere" of the area is very suburban, from an aesthetic and residential density standpoint.

5. Contrary to the description of the surrounding uses, there are no restaurants, outside of restaurants inside of the Fashion Square Mall.

6. There is no high density residences surrounding the property. The Area Plan for the area shows Low Medium II Residential (18-29 dwelling units/net acre) for multifamily residential units to designated for residential uses north and west of the site. The same source (<http://cityplanning.lacity.org/cwd/framwk/chapters/03/tab31.htm>) cites a "High Density as "110-218 dwelling units/net acre." Even so, the Framework cites that "Densities may be adjusted to achieve neighborhood stability and quality of life". This is why much of the surrounding property is zoned Q[RD]1.5-1-RIO, and even R3-1-RIO for land designated Community Commercial on the Area Plan.

7. While indeed a shopping mall is located to the east and across the street from the Project Site, the site also has a strong relationship with the nearby single and multi-family properties. The site has, by its design and it's quiet use, acted as a buffer between the Mall and those residential uses.

The trees on the perimeter of the Project site, as well as the street trees in front of existing multi-residential areas on both sides of Riverside Drive, in the area of the Project site, make it very different in appearance from similar development located on Riverside Drive west of Coldwater. Furthermore, the existing commercial uses, to the north of the property on the north side of Rivrerside, are small scale and appear to be one-story in height. Hazeltine is clearly the boundary between hustle and bustle and quite in this area of Riverside.

Ground level photos of the surrounding properties would clearly show the unique quality of life experience in this area along Riverside.

8. The architecture of the Sunkist Building, including characteristics of its unique style and how it sits on the property should be briefly described in this section.

9. Portions of the property sit below the adjoin street level and should be described in this section.

10. The discussion of the "Land Use Plan" should point out that the Plan should have been revised 8 years ago, and then again revised in two more years.

11. In "Project Objectives Section" there is a citation that the project is intended to "help meet the market demand for new housing in the region and in the City of Los Angeles." The DEIR should substantiate that this style of project (5 story, one and two bedroom, at this market price, mixed use) is in demand as stated.

Also, the project seeks to "Create an aesthetically attractive, high-quality design that engages the Los Angeles River and complements the existing Sunkist Building. The design of the project does very little to

complement the Sunkist Building. It is a structure that unique because of its aesthetics as a building, how it is set on its building pad, and how it is observed from the perimeter of the site through mature trees. The proposed project does not meet this objective since each building that it proposed will obstruct views of the building from not only the perimeter of the site, but also, from a large portion of the site. This objective is also important to consider in evaluating proposed Alternatives, including one which would put the proposed new building at a location that did not include the Sunkist building.

A less intense mixed-use project at the site would also be consistent with the zones permitted on the site by the Area/Community Plan. Many of the uses in the area of the project site are at a low intensity for what is permitted by the Plan. The actual area development is respectful of the low intensity suburban type nature of the area. Photos of the existing development in the area should be included in the DEIR.

While currently, there is in theory, only walkability on the site by people granted access to the Sunset property, especially with the recent addition of gates across its driveway, the proposed project does not invite walkability on or off site by the general public. It's a lovely objective that is not provided by this project. Off-site, the removal of mature and tall trees and infill vegetation, will create a heat island on the ground for passerby's (this is one reason site photos are important)

Additionally, to provide necessary traffic mitigation, the sidewalk from eastbound Riverside to southbound Hazeltine would be narrowed in front of the site, on two sides, with the same action occurring at the southwest intersection of Riverside and Woodman. Trees that provide shade, would also be removed. The bus stop currently located just to the west of the southwest corner of Riverside and Woodman would be moved to the east side of Woodman to a distant location, to avoid blocking driveways necessary for the operation of a gas station – this would be detrimental especially to people seeing to use cross transit lines on Woodman.

Implementation of the Project would also affect the aesthetics enjoyment for the pedestrian off-site, as a bucolic project site "crowned" by the Sunkist Building and surrounded by trees, would be converted to the pedestrian walking beside walls of 5 story residential buildings, on the north perimeter and a 4 story parking structure between the Sunkist Building and Hazeltine, with the affects also on the bouncing of noise off of the buildings, sounds of increased traffic, grocery deliveries on the site, and more. There has been no clear indication how the commercial uses would engage pedestrians on street.

On site, the walkability of the site may be enhanced, since the public would now be invited to portions of the site; to access residential buildings, commercial uses, and the plaza proposed at the LA River Channel. However, it is questionable how readily will customers of the proposed market be to walk from the market to the distant parking structure dedicated to that use.

While it is laudable that the project seeks to rehabilitate the Sunkist Building, the value of it to the community will be significantly reduced thanks to the current design of the project.

Though an objective of the project is to project is to provide access to the River Plaza, there has been no provisions cited as to parking for vehicles for visitors to that portion of the site and whether there will be charges for parking there.

12. In the "Project Characteristics" section, while it is recognized that this is in some ways a general discussion about some topics, addressed in length, elsewhere, nevertheless the level of detail of some project characteristic lends the leader to believe that the information about the particulars of the project is comprehensive.

While the Section speaks about total spaces provided, there is no discussion as to the parking ratio used (and it's year of establishment) for the Sunkist Building. Without that information, the reader cannot determine that the correct ratio is being implemented.

There should be a current anticipated number of people anticipated to use each sort of apartment by bedrooms described. There should be a comparison of the anticipated rental rate – since the applicant is already speaking about the quality of the development – with others in the area. It is my understanding that many units, at a variety of prices, are attracting a larger number of people living in them than what many people would anticipate living in such a unit. This information affects determining the impacts of the project on a variety of impacts including Public Services, and Transportation.

The reference of the height of the proposed Building A to the existing Bloomingdales located to the east of the site, across the width of Hazeltine, and also on Riverside is not appropriate in this section of the document. This section is about the project description not its potential impacts. If there is an insistence to include the height of the Bloomingdale building, then the distance between the two buildings should be described, as should the distance between the proposed property buildings and the structures on the three other sides of the property, as well as that streets of the specific classifications separate the property from others, and, the heights of all structures located across the street to the north and east of the property, should be described.

From a functional standpoint, Bloomingdales is represents the western end of the Fashion Square Mall, it has a substantial setback from Riverside, far more than the project buildings proposed on Riverside, has been at that location since the Mall was initially built, represents a use very different than does the subject property, and is bridled with "Q Conditions" as a part of its zoning. Hazeltine divides the residential community, from the Mall as does Riverside for residents north of the Mall.

Figure ii-3, while attractive, is not as legible to the Reader as it needs to be for decision making. The information, for instance about emergency access (along Calhoun) and necessary information about the ways the driveways are to be used is not evident. Additionally the proposed external road improvements and the existing improvement that will remain, should be depicted on the site. The loading docks for the commercial segment of Building A is obstructed by landscaping as is the actual size of the plaza for the LA River Channel. The site plan should also show the factual outlines of existing structures along the abutting streets. The information would allow a comparison of the project's setbacks to that on other nearby projects with the same use.

The distances between buildings should also be shown so that the distance to parking for people intending to use the market and other commercial uses will become evident. It may be best to show a site plan that has not been enhanced by the depiction of landscaping for it also obstructs the reality of the setbacks of the buildings from the surrounding streets, which is an important issue for a decision maker to consider.

The depiction of Cross-Sections are disconcerting, not only because of the information that they present but also, the information that they do not present. It is important to note that a Reader should not have to be an expert to understand the most basic of information provided in the document. Furthermore, the information that typically take professional qualifications to understand are typically included in the project Appendix, with the body of the document summarizing those findings. In this case, the Cross Sections, are difficult to read because they are presented without any context to what is on the ground (how do the building heights related to the abutting sidewalk (except for Building C), to each other, to the Sunkist Building. Additionally, retail uses and retail parking is showing up in unexpected and non-disclosed locations of retail parking in Buildings A and B, and retail uses in Building B. From a practical standpoint, it was not feasible to print legible copies of these drawings.

Looking at the colored Elevations of the buildings, it is difficult to ascertain the width of the proposed buildings (to be able to compare them to the widths of existing off-site residential buildings), Since the objective of the project is to engage the Sunkist Building, that buildings should appear in its actual location behind the proposed buildings, as a dotted outline. In one elevation, the Sunkist Building is shown, but I believe it does not appear as it would with project implementation. The reader should be able to discern the relationship of the proposed building to the Sunkist Building that is believed will lose substantial value to the community with project implementation. In fact and additional series of cross sections should be provided, without landscaping, showing the Sunkist building as it appears from the street, complete with height and width depictions.

In discussing "Landscaping, Open Space and Recreational Amenities" it is disputable that a project site that currently looks like a park with very tall and mature trees and other vegetation, and with an architectural wonder crowning it, be enhanced by the construction of building masses, landscaped planters, private outdoor recreation areas, and the development of a small plaza located between the existing Sunkist Building and the LA River Channel and Freeway. When most people think of those features quoted above, they think of combined and active areas open to the public, with parking assured, as opposed to looking at planters, private balconies, and the fringes of rooftop gardens. Additionally, will there be a provision for public art?

### III. Environmental Setting

#### A. Overview of Environmental Setting

1. If the document is going to refer to the plethora of public transit opportunities near the site, then the location of each line, closest stop, as well as distance to subject property should be listed either here, or referenced to being provided in the Transportation/Traffic Section or in the Traffic Report. Without that information provided, the reader may wrongly believe that public transit is readily and efficiently available to users of the site.

2. The height of the Sunkist building, as it relates to the surrounding streets, should be provided in a cross section from each side of the property. The importance of this is that an objective of the project is to engage the unique architectural structure, yet, the project obstructs view of it (in some areas totally) from surrounding streets.

On it's website, the Los Angeles Conservancy states about the Sunkist Building on it's website: "The office building has a Brutalist feel, with its extensive use of concrete and impassive façades, but its off-white color imparts a certain lightness, almost an airy quality. It is a contrast that works—this building is definitely remembered by anyone who has passed by it." (<https://www.laconservancy.org/locations/sunkist-headquarters>). Therefore, the relationship of the current site development to passersby on adjoining streets in an important part for the reader to understand the site that would be changed by this project.

3. The height of the "mature street trees" along the project site's frontages should be included here, as should photos of the perimeter of the site).

4. While the project site is served by Public Services at an urbanized level (though police services are lesser than in some other parts of the City) the area is not urban in its character. That distinction should be made. Sherman Oaks is a suburban portion of Los Angeles City.

5. The discussion of Surrounding Use states that a "restaurant" is located in the Trader Joe's shopping center. There are no known restaurants in the small center.

6. There should be a description of the amount of area on the site falls within each on-site zone designation. This information would help the Reader contemplate potentially different Alternatives for the Site.

7. A discussion of the slight though influential sloping of the property should be cited. The importance of this information allows the reader to understand how the parking areas are very much secondary to the building's and not the parking areas predominance on the site. While of course not to the caliber of the Washington Monument, would someone say that the land that surrounds the Monument is underutilized or that it is purposefully left in that state to allow the Monument to be seen and set the character for the site?

8. A copy of the Van Nuys-North Sherman Community Plan, depicting the project site and extending a reasonable distance in each direction, as well as a legend, and a description of the permitted zoning, land uses, density should be provided here. The reader should be readily able to compare the proposed project to the range of permitted and existing uses and intensity in the area as well as observe the patterns of permitted and zoned development.

9. In listing the related projects, it would be helpful if the document listed the common names of the "Related Projects" For instance, "14049 Ventura Boulevard" project, is commonly known as the Ralphs Market expansion. It also should be explained, herein, why projects, that were already functioning at the time the Traffic Report was prepared, are listed as "Related Projects."

### IV. Environmental Impact Analysis

#### A. Aesthetics

1. While this may not be the correct place to make this statement, I would say that this project will cause a Significant Impact on Aesthetic resources (the character and the quality of the area), that cannot be mitigated. The current site is characterized by a unique architectural feature (the upside down pyramid Sunkist Building) that sits approximately mid-point near the rear (south) of the property as a crown on a property surrounded by mature trees and vegetation and landforms. The site design focuses the eye of the passerby onto the building, rather than lower level parking areas. The views of the building are framed by perimeter vegetation (including

large mature trees and hardscape). All these features of the site will be removed and/or generally obstructed by the proposed project. The project will not be an enhancement of the site or of the area in which it is located.

Addressing the specific criteria cited for evaluating changes to a site, from page IV.A-1 in the DEIR, are as follows:

a. The project as designed does significantly adversely impact inasmuch as:

1) "The presence of visual resources, both natural and man-made, can also affect the aesthetic character of an area."

The site is noted for the architectural wonder of the Sunkist Building, is especially appreciated from passerby on adjoining streets, is the centerpiece of a bucolic portion of Riverside (along with all the other multi-family structures on the street in the area that feature lengthy setbacks and abundant street and property trees. The contrast of this area to where two other IMT buildings are constructed on Riverside, between Coldwater and Whitsett is significant.

2) "The visual character and quality of an area can be adversely impacted by the loss of existing features of aesthetic value and by the introduction of contrasting features that contribute to a decline in overall visual character (e.g., the introduction of contrasting features that overpower familiar features, eliminate context or associations with history, or create visual incompatibility where there may have been apparent efforts to maintain or promote a thematic or consistent character)."

Not only will the trees and hardscape on the perimeter and elsewhere on the site, that showcase the Sunkist Building be removed by the project, and that create a bucolic setting, but, the proposed new structures to be added to the site, as a part of the project, will not only block most of the views of the Sunkist building from surrounding streets, but they will also convert a what appears to be a suburban office campus (even with one building) into an urban center.

3) "Conversely, the overall visual character of an area can be improved by the addition of features that enhance the existing visual environment (e.g., the introduction of elements that contribute to the context or improve the overall aesthetic character of an area, or the removal or improvement of elements that may have been considered blight to the visual environment)."

The site is not considered under any circumstances a blight for the area. In fact, it is considered a cultural icon for the area, not only because of the architecturally unique Sunkist Building built there, but also how it is set onto the site as its "crowning glory". The current development on the property is considered a special niche in the community with its park like atmosphere introduced by mature trees on its perimeter.

The overall visual character of the area will not "be improved by the addition of features" by the Project. The structures and their orientation on the site, will create a project that is very different from the existing and relevant projects in the area.

Hazeltine, on the east side of the property, represents a distinctive boundary for development in the area. While indeed the Bloomingdale's department store, at the southeast corner of Hazeltine and Riverside (the project site is located at the southwest corner of that intersection) rises to a height of 75', the Bloomingdale's building represents the westerly conclusion of the Fashion Square Mall. Nevertheless, and unlike other portions of the Mall's Riverside frontage, the building line of that building is approximately 45' from its Riverside Drive. Most importantly, the existing Mall is a very different land use than the predominantly residential uses that is being proposed for the site. To cite the Bloomingdale's building as a benchmark for the proposed height of the proposed project or any other aspect of the project is disingenuous, especially when considering that the traffic analysis of the project did not include any obvious times associated with sales and other activities at the site and that the proposed opening of the north driveway on the site will seriously impact the existing on-site and off-site traffic pattern associated with that building and the Mall in general.

In addition from the project sitting on the perimeter of and obscuring a significant architectural asset to the community, the proposed Project design is very different from the existing similar uses, to the Project, also located on Riverside Drive. The multi-family residential uses are primarily 3 story with only a few at 4 stories; they have building widths of around 45' or more, however, the buildings are broken into segments instead of a maybe 250' wide buildings (without building measurements readily available on a site plan, it is difficult to discern) along Riverside; and are setback at various distances from Riverside interceded by on-site

and street trees and vegetation. Even the commercial use directly across the street from the project, at the northwest corner of Hazeltine and Riverside, appears to be one story in height. (see ZIMAS)

2. It would be fair to say that the project is inconsistent with the “Urban Form and Neighborhood Design Chapter” of the *City of Los Angeles General Plan Framework Element*, by just evaluating the project in light of the information from that document presented in the DEIR (page IV.A-4). Discussions relative to the various aspects of the project that are inconsistent with the Plan, as described below, should be discussed in the DEIR.

The massing of the Project is inconsistent with the Urban Form of similar uses along Riverside Drive, between Hazeltine and Van Nuys (on both sides of the street) and even looking at the north side of Riverside (across the street from the Mall) and on both sides of Hazeltine, just north of the small commercial corners north of Riverside. The similar uses in the area are far less intense with regard to units provided in each building, the height and the length of the building, the setbacks of the building from the adjoining streets, and the intervention of significant vegetation and trees on the sites and provided as street trees. The project is more consistent with the Urban Form along Riverside some 1.5 miles west on Riverside, where IMT has built buildings with similar massing.

The Project is also inconsistent with the precepts of the “Neighborhood Design” referenced in the DEIR (ibid) in that a suburban bucolic area is transformed into urban area that did not exist prior to the project. Ironically, while the Hazeltine side of the Mall is active because of the location of the parking structure and access points there, the north side of the Mall between the west side of the Macy’s access and the left turn pocket for westbound Riverside to southbound Hazeltine, is relatively calm many times of the days of the week. Crossing Hazeltine, the intensity of the area drops significantly thanks in large part because of the current disposition of the Sunkist property as well as the properties on either side of Riverside. It is not currently the residential land uses there that make this area active, it is the traffic attempting to reach the 101 Freeway access points and the Mall, and the Trader Joe’s commercial center. This project will significantly and adversely change that environment.

Additionally, and since it is referenced in the DEIR (ibid), it should be noted that while the “Urban Form and Neighborhood Design Chapter encourages growth in areas that have a sufficient base of both commercial and residential development to support transit service, this cannot be a scenario of “if you build it, transit services will come.” A clear description of the location of transit systems stops, the headway times, the limitations as to hours (e.g., Dash), limited connection to other modes of transit, and sample trips to major job centers in the area, would clearly demonstrate that this property is poorly served by public transit.

The discussion of the “Open Space and Conservation Chapter” demonstrates that the project is inconsistent with the recommendation that the Project open space is designed to enhance the community and neighborhood character. Firstly, the project changes a largely empty parcel framed by mature trees, to walls of buildings that not only hide the star of the parcel, the Sunkist Building, but also hides the majority of the limited “open spaces” areas on the property. The open space described for the property includes areas that are not visible or open to the public, including balconies, and roof-top gardens and a pool and spa. While those areas may enhance the recreational opportunities for the residents, they provide nothing of a visual nature for the general public.

The open space visible to the public, while it will include a greenspace and plaza near the Los Angeles River channel, will primarily consist of landscaped walkways, landscaping on the perimeter of the site. The aesthetics of the project site, as seen from the public streets will be a major “step down” from what is currently on the site and on nearby similarly used properties.

3. The compliance of the Project with the City’s “Walkability Checklist” is questionable for immediate off-site and distant off site pedestrians. Along the frontage of the property, moving from west to east along Riverside drive, a pedestrian is quickly transformed from walking in a tree shaded pavement in front of 3 to 4 story buildings with street trees and various setbacks, to two walls of buildings rising 5 stories into the sky and closely abutting the pavement. The pedestrian will be adversely affected by the aesthetics of the property as well as the loss of breezes coming across the sidewalk now blocked by the buildings and reflecting air, heat, and noise.



Pedestrians along Riverside in front of the Project will face a narrowed pavement, as they approach Hazeltine where a new right turn pocket will be constructed. The alignment of the crosswalk from the Project site to the sidewalk to the east of Hazeltine, may cause a problem for pedestrians. The new crosswalk may interfere with the ability of the Dash bus to continue have a stop at the southeast corner of Hazeltine and Riverside.

Pedestrians who walk in front of the Ross/Bank of America property, at the southwest corner of Riverside and Woodman (approximately one half mile east), will be affected by the construction of a new right turn pocket that is a mitigation measure for this project. Additionally, the crosswalk will have to be altered to accommodate the widened street, which may cause some alteration to the island currently dividing the north and south segments of the street. This design will also significantly impact transit users on Riverside as well as property owners east of Woodman, since the project proposes move the existing bus stop to a location east of Woodman. Putting a bus stop east of Woodman would necessitate either blocking access points to a gas station, or be placed next to a private residence. This would make transfers to buses along Woodman (north or south) more difficult for bus users and would stop MTA from reinstituting a bus line that uses the 101 Freeway in either direction, as was there prior to the implementation of the Red Line; a line that took riders to Downtown LA about 15 minutes faster and without changes than the Red Line.

4. It is important to restate in this review of the potential significant impacts of the Aesthetics of the proposed project, some of the incorrect information provided in the DEIR – because, a reader could make inaccurate judgements about the Project. For instance, there are no “high density residential uses” in the area by either Community Plan or Zoning. The provision of a 75’ potential height limit does not invite high density development since it refers only to the potential height of the buildings and not the maximum number of units per acre. There is no restaurant known to exist in the Trader Joe’s center to the north of the site. While shown at the wrong densities on the aerial photo on page IV.A-10 shows the multi-family residences to the west, they are not mentioned in the written statement about surrounding uses. Just at the height of the segment of the Mall to the east of Hazeltine is mentioned, so should the height of the other uses in the area be mentioned – especially because they would show the contrast between what is existing in the area and what is being proposed on the Project site. Furthermore, once again, ground level photos of the Project site from all directions as well as of adjoining uses should be included in the document. The reference aerial photos is insufficient in so many ways to describe the existing on-site and off-site characteristics.

While in fact the site does have, with the exception of easy access to public transit, urban infrastructure, the design and massing and number of residents in the multi-family development in the area does not represent an Urban Environment. Furthermore, many of the single family residential streets in the area do not have sidewalks or streetlights and are very suburban in nature. Placing an urban project into such a suburban area may also create safety issues for local residents who walk in the streets that are absent sidewalks, and are faced with an abundance of vehicles associated with the Project.

5. On page IV.A-12 of the DEIR it states: “the Sunkist Building is considered a valued resource.” Therefore, this document should provide a before and after Project view study of the Sunkist Building, as observed from all four sides of the property (including as view from the 101 Freeway because that view will be changed for westbound traffic on that roadway). As mentioned before, the difficult to read cross sections of the proposed project should also include the Sunkist Building siting relevant to those locations.

6. The citation on IV.A-13, is incorrect relative to the site having a flat topography, it does not. It has man made depressions around it, the Sunkist Building sits on a pad that rises from the property, and various hardscapes are on-site (e.g., earthen and wall topped berm on the southwest corner of the site).

7. While the document on page IV.A-13 speaks about the “large stand of mature trees located on the east side of Calhoun” as obstructing the views of the Sunkist Building, the document should also address those trees as a part of the aesthetics of the site that will be a loss due to the Project. Ironically, the depression of the parking areas on the west side of the building give a prime view of the building to anyone travelling along Calhoun.

8 Contrary to what is stated on page IV.A-13, the Sunkist Building is not obstructed by development from any direction (since the property runs from block to block in all directions, and the existing landscaping on its perimeter and on the parcel are attributes to the Building).

9. There is sufficient information in this document as well as the Project EIR to state that the project meets the “Thresholds of Significance” for Aesthetics as listed on page IV.A-19 of the DEIR. The only Mitigation Measures that would reduce the level of impacts to insignificant would require a revised design that would allow the National Register, California Register, and Los Angeles City eligible for listing Sunkist Building to remain the focal point of the property from off-site locations that may include:

a. Reduce the building heights to 3 to 4 stories maximum along Riverside Drive, varied according to proximity to Hazeltine; reduce the width of all buildings (Riverside, Calhoun and Hazeltine), to more in keeping with what exists (average) along Riverside west and directly north of the property; remove the 4 story above ground parking structure or eliminate it so that it does not sit between the Hazeltine and the Sunkist Building; reduce the project (density, use), so that it does not require the implementation of the dedicated right turn lane at the southwest corner of Woodman and Riverside; provide varied setbacks and street trees along Riverside and Calhoun; and, other characteristics to not turn the site and the area from one that is sylvan to one that is highly urbanized (absent adequate public transit and services. No such Alternative has been presented in this DEIR.

10. Contrary to what is stated on page IV.A-23, the proposed buildings weakly complement the Sunkist building. While indeed there are horizontal lines similar to those on the Sunkist Building, many people would say that it is the shape of the Sunkist Building that is what is unique about it. Even in citing why this project cannot be moved to another location is the comment that one of the goals of the project is to have a relationship with the Sunkist Building. Blocking the uniqueness of the Building (e.g., its triangular negative spaces rising from ground level, by buildings to only show a linear segment of the Building to the street, really does not complement that structure (see Page IV-27, which appears exaggerated in the use of perspective to give a triangular appearance to the side of buildings that form right angles and not triangles)

Furthermore, as evidenced by the elevations, it shows that with little exception, the Sunkist Building and its significance as an architectural landmark will be obstructed by the project. This fact further supports my belief that the Aesthetics of the Sunkist Buildings (in addition to the site that surround it on the property) will be significantly impacted by the project.

Though not an architect, but as a seasoned land use planner, I would say that there alternative designs, including massing, orientation of buildings, materials not included (e.g., wood-like product on the face of balconies and on the parking structure) that would better complement the Building. There are any number of scenarios that could create a viable product for the project proponent that would “honor” the existing Building, though the project may not fit the applicant’s preferred design. No Alternative projects have been presented that provide viewable off-site area of the Sunkist Building. It is also suggested that the applicant consider materials that are more consistent with the existing development. When I first viewed the elevations of the Project, I thought that the wood-like products were inserted into the project to compensate for the bounty of mature vegetation being removed to make way for this particular process.

11. In the discussion in the document about Shading, a plan of the existing site, with Shading added, should have been included in the document so that the impacts of the project could be evaluated compared to what is on site now.

12. Contrary to the commentary that is provided in “(5) Consistency with Regulatory Framework”

a. The implementation of the Project would not:

1) Improve the Project Site’s visual character and pedestrian streetscape, because, it would remove tall trees that provide cover and visual enjoyment to the community; it would create walls of buildings along the street frontages and/or the Sunkist Building from off-site views; the neighborhood commercial uses are not needed at this location and in fact would cause more harm than good; the buildings do not complement the Sunkist Building or any uses or structures in the building by their design and massing, and they do not even relate to the site; the landscaped areas are nominal for the general public and the plaza/open area will be hidden in a corner of the property, with no knowledge if parking will be provided to that location without cost;

the appearance of natural materials on proposed buildings is irrelevant considering that the focus of the development, the Sunkist Building is known to be a very minimalist design without association with nature; the project is too urbanized for this suburban area where neighborhood streets lack sidewalks and streetlamps; the reliance on the Bloomingdale's building is disingenuous as it has very little to do with the Project Site and proposed use, especially given that Riverside is lined with lower density and intensity multi-family dwellings; the fenestrations of the building are nominal when one looks at the base of the triangle formed by that design on the face of the buildings; while the project will change things on the Project Site, they definitely will not improve them in fact, they will degrade them; locating the buildings at the front property lines is not a positive attribute of the project, as it is inconsistent with adjoining uses, and the contrast of that design (to create walls of 5 story buildings) to open areas with trees, is significantly adverse.

13. Level of Significance of this project is not mitigatable. See discussion above for this section under Topic 9.

#### **D. Cultural Resources**

1. The exterior of the Sunkist Building is unique and in of itself is unique in that it has been a filming location for a variety of media. A representative list should be provided in the document because it would demonstrate that the uniqueness of the exterior of the is of value to those who are not seeking it as a place to conduct business.

2. The document on page IV.D-19 provides a list of the "character defining features of the Sunkist Building." With this information, and inasmuch all these attributes will for the most part be hidden from the general public off-site, it is apparent that the Project will have a significant impact, that is not mitigatable by means other than a not yet proposed Alternative, on Aesthetics as well as Cultural Resources. From a cultural standpoint, I would say that the underdevelopment of the site, and the vast open parking areas are representative of the era in which the development was created where, land was relatively inexpensive in the San Fernando Valley, and the automobile was and still is the predominant form of transportation in the area.

3. But for the horizontal lines of the residential buildings, the proposed development is not complementary to the Sunkist Buildings, and in fact, it obstructs it view from adjoining streets. A cultural icon to the region, not just this area, will be hidden behind walls forever.

#### **F. Land Use Planning**

1. Much of my comments regarding Land Use Planning matters are discussed prior to this section.

2. With respect to the discussion in the document relative to the Housing Chapter of the General Plan Framework, the project does not support the goal of "2) providing development opportunities along boulevards located near existing or planned major transit facilities and areas.....while protecting and preserving surrounding low density neighborhoods from the encroachment of incompatible land uses."

There is insufficient public transit available to the site. If the information about the location of transit stops and the feasibility to use them, as suggested previously in this document, it would be evident that the majority of people affiliated with this site would use personal vehicles to access the property.

The potential significant impacts of the project with regard to significant traffic impacts, as well as comparing it the proposed project in its unit counts and massing, are clear indicators that the project will not preserve the existing development in the area. It should be noted that the area is designated for Low Density Multiple Family residences in the area, not walls of 5 story buildings as proposed.

3. The citation of the 2010 Bicycle Plan as a support for this project (page IV.F-7, demonstrates a lack of realty base analysis for this project While indeed Hazeltine is shown as a "Network Connector" on the Bicycle Plan, it is a dangerous route to travel for a bicyclist. In fact, to go south or northbound on Hazeltine, adjoining the site or in the area, a bicyclist must use the sidewalks to travel safely. The California Motor Vehicle Code permits the riding of bikes on sidewalks if they do not interfere with pedestrians. How does that conflict, then, affect the walkability of the project on its perimeter?

4. With regard to the reference on page IV.F-13 to the Project site being located in a "High Quality Transit Area" (HQTa) denoted in the 2012-2035 SCAG RTP/SCS. It is important to note that just about every piece of

land in the City of Los Angeles, that is not in a Hillside Area is considered a HQTA by SCAG. A copy of the map from the referenced document should be included in the DEIR so that all Readers understand that lack of uniqueness of such a designation.

5. The information presented in this section, is among the many places in which it would be more clearly understood (especially in the context of the existing setting) by the Reader if ground level photos were included of the subject property from all four sides as well as of the surrounding areas, by reference in an earlier section of the DEIR

6. The square footage in each zone existing on the site should be presented so that Alternatives based on existing could be formulated in ways that they were not in this document.

7. Why is the zoning on Building B and C that they would allow ground floor commercial uses when they were only described to be located in Building A

8. More information needs to be provided as to the distribution of the locations of serving alcohol, how will it be served (bar, restaurant, bar in restaurant) and the hours of consumption. This information would also help the Reader determine potential significant impact of the sale of liquor as well as craft Mitigation Measures if necessary.

9. For the Reader to determine the accuracy of the information provided in "Table IV.F-2" relating to the Project's consistency with the General Plan Framework (pages IV.F-22 thru 32), additional information should be provided in the document, such as: what type of units and price points are needed in the area to accommodate future residents; provide more information, as cited before, about the existing public transit in the area, which in fact, is seriously lacking; recognize that the proposed buildings on Riverside are out of scale with other similar residences to the west and immediately north of the site; and much more that cannot be addressed at this time due to the time constraints of reviewing this document by this Reader.

10. Based on the facts of the Environmental Setting of the Project area (e.g., lack of public transit, bike access north and south, the actual size of existing multi-residential units) as well as the impacts of the project (building heights, unmitigatable, traffic impacts, obstructing the view of a regional cultural icon, I do not agree that the project will not have a significant impact on the environment.

#### **H-1 Public Services - Police Protection**

1. It should be noted in the DEIR, the statistics by property of police services to the area. For instance I understand that the Fashion Square Mall currently receives the most services of any property in the service area.

2. It should be noted that the LAPD response time to the residential area north of Fashion Square (bounded by Riverside, Magnolia, Murietta, Mammoth/Woodman, has been so unsatisfactory to many residents there, that more 100 homes residents voluntary pay for an armed response patrol through the area a significant number of times per day.

3. The project operation should include a 24hour/7 day a week, motorized patrol through-out the site to provide sufficient security and primary emergency medical services to people on-site for a variety of purposes.

#### **H-2 Public Service – Fire Protection**

1. It is suggested the project provides Fire Prevention tactics in excess of what is required by City Code.

#### **H-3 Public Services – Schools**

1. I stipulate to the comments made by Thomas B. Jones of 5050 Matilija Avenue, Sherman Oaks, 91423.

#### **H-4 Public Services – Parks and Recreation**

1. While it is noted that Quimby fees will be provided by the Project, there is no mandate that those dollars will be used on site or locally. Given that the Van Nuys Sherman Oaks Park is located within walking distance of the project site, the Park should be the first in line to be considered for Quimby fees. This is especially so since other than access to the LA River Channel, there will be no active recreation areas on the site for the general

public. Furthermore, there will be one pool and spa provided for all residents and then only located in Building B.

2. Table IV.H.4-1 of Parks and Recreational Facilities Within a 2-mile Radius of the Project Site (page IV.H4-11, does not include information about the Sherman Oaks East Valley Adult Center adjoining the VNSO Park on Van Nuys Boulevard. Parking at that facility is already overcrowded many days of the week. The listing of services should include outdoor gym equipment, and a running/walking track.

3. The VNSO is insufficient in services and facilities at this time, including a lack of benches in the park (which could be provided in a design that would prevent horizontal use of them for sleeping). How will the project affect other services provided at the Park, including use of pools, tennis courts, gyms, availability on organized sports teams, even permits to use the party pavilions at the Park?

4. Those portions of the site that are not for active recreation (pools, small park next to the LA River Channel, designated walking paths) should not be given the same credit for open space, as are landscaped areas, balconies, etc.

## **I. Transportation/Traffic**

1. Comments for this section are primarily based on this section, though some of my knowledge may come from having read “Appendix G Memorandum of Understanding, Los Angeles Department of Transportation Assessment Letter, and Traffic Impact Analysis” in this DEIR. Comments on the documents contained in Appendix G will be reviewed under that heading, out of order of the document, and following the comments under this heading. While it is understood that the Applicant worked with the LADOT to develop an MOU for what should be discussed in the DEIR, the MOU was found to be insufficient in many ways, in addition, this Reader does not agree with LADOT’s assessment of the project.

2. Although an MOU was established between LDOT and the applicant, the MOU was deficient in that it did not require a sufficient number of traffic counts, and it did not require traffic counts reflective of the existing Fashion Square Mall located east of Hazeltine from the site, which has two driveways on Hazeltine. The MOU should have required seasonal traffic counts, as well as counts accurately reflecting weekend traffic at its peak times.

3. Although the MOU stated no TDM or Transit credits, the Project Traffic Report did count those as credits. The concept of the building space that will not be used, as a mitigation measure for traffic impacts, by LADOT seems inappropriate. There should be a clear definition of what are the Project Impacts absent credits for TDM and the use of Public Transit and bicycles.

4. Explain why arterial CMP monitoring stations located at Ventura and Woodman, and for the Freeway at its intersection with Coldwater Canyon, especially since the Woodman and the Van Nuys ramps are proximate to the site?

5. The analysis of the Public Transit System is inaccurate, incomplete, and misleading. The location of each of the closest stops to the site, should be provided on a map, as well as its distance to the project site. Additionally, a typical trip to a major employment center (e.g, Downtown LA, Van Nuys Civic Center, Westwood, Warner Center) should be provided for each line as well as limitations for each line – such as the less than 10 hours of availability of the Dash as a circulator to various transit hubs. Would the use of Public Transit be considered a viable mitigation measure if it took 120 minutes to reach a destination on one of these lines. Likewise, would a bus line that is located nearly one mile from the Project Site considered a viable consideration for use in association with this project?

6. As stated before, the referenced “High Quality Transportation Areas”, in the documented should be shown in a map to show that just about every non-Hillside in the City is a HQTAs.

7. The existing setting of and near the Project should be depicted on site plans and on aerial and ground level photos. The graphic in this section need to be enhanced, for without them, decision makers would consider the potential impacts of a project without full knowledge of the existing and resulting setting. With this knowledge, it may show that the proposed Mitigation Measures are not feasible (i.e., the new right turn pocket lanes at Riverside/Hazeltine and Riverside/Woodman, the moving of the existing bus stop at the west side of Woodman/Riverside to the east side of Woodman).



a. Site plans of the existing transportation related assets, for the Project site (including driveways, striping and street designs on the north and east sides of Riverside and Hazeltine, respectively, as well as for the location where the proposed designated right turn pocket and the area east of Woodman, proposed for a new bus stop should be depicted in these graphics.

b. Aerial photos of the existing setting are needed at a scale, and should be enhanced to show existing street markings and other improvements in the area. Traffic signals in the project area should be identified to show the level of technology they have (e.g., protected Left Turns, phased Left Turns). Street lines should be demarcated to clearly identified, including stacking lanes for right and left turns only, with that indication. The existing bus stop locations, including identification "line" number should be indicated.

c. Ground level photos should be presented showing street level photos of the location of the existing bus stop near the southwest corner of Woodman and Riverside, as well the areas that are proposed to be reconstructed on Riverside/Hazeltine and Riverside/Woodman with new right turn only lanes.

8. Areas that will be affected as a result of the Project should be depicted on site plans in aerial and ground level photos

a. Site plans of all the proposed changes to the surrounding transportation network.

b. Aerial photos with superimposed proposed changes to the surrounding transportation network .

c. Ground level graphics of what areas would look like with Mitigation Measures imposed

9. There is no indication as to the number and where Guest Parking will be provided for visitors to the residents of residential uses.

10. There is no indication as to the ratio used to determine the parking requirements of the Sunkist Building and on what version (year?) of the standard. There is no indication if any of those spaces, which may have exceeded the requirements of the time, were used as spaces for the new development. There is no indication if parking space numbers were reduced in response to the "optional" (assumed determined by the City) provision of bicycle parking spaces for both the residential and commercial uses – this information is important for the Reader's knowledge in light of the fact that the use of bikes as transportation mode of transit will be very limited to this site – in fact, a study of bike use at the existing IMT buildings (by affidavit) located on Riverside between Coldwater and Whitsett, and for the existing tenants of the Sunkist Building should be provided. There is no indication as to the number of Compact Spaces that will be provided, since that is optional for the project applicant to decide. Since the document includes information about the number of electric vehicle spaces provided, it is another reason why the inclusion of the former information is a reasonable request.

11. Along with the reference of the Metrolink service and a community transit center (assumed to be the intersection of the Orange Line and the Red Line, the document should described the time that it would take to reach each location by public transit and by car (and generally include a picture of the parking situation at each location, which would highlight that parking is a premium at the transportation portals, other than at the Metrolink Station. It should be noted that merely citing the availability of resources is not sufficient for this document; the discussion also needs to describe it "usefulness" to the Project (e.g., identifying Significant Impacts, Mitigation Measures, and where Significant Impacts Remain.

12. In the discussion of the existing Hazeltine, it should be noted, because it is relevant, that Hazeltine narrows to a single lane north of its intersection with Burbank, in both directions. "By right" development in that area will ultimately impact traffic along that street, as will the potential "by right" development along Hazeltine from Magnolia south to Moorepark, where many 'underdeveloped' units will be replaced by right, by larger developments and never appear on the cumulative list of any project.

13. The unique speed limit of 40mph posted for Riverside, except in school zones, should be described for that street. It should also be described as alternate for travel along the 101 Freeway, which it parallels.

14. Van Nuys should also be identified as an access point for the 101 Freeway, the last entrance to use the 405 Freeway which is to the west of the site, and that the next westbound/northbound entrance to the Freeway is located on Haskell in Encino, approximately 2 miles from the Van Nuys on-ramp.

15. Woodman should also be identified as providing access to the eastbound/southbound 101 Freeway.

16. Milbank and Valleyheart should be described as the cut through roads used to reach Van Nuys Boulevard, to avoid traffic on Van Nuys associated with the 101 Freeway access ramps, and to also reach the

Freeway when seeking to avoid traffic lights and congestion at Riverside/Hazeltine and Riverside/Van Nuys, including people exiting the south Hazeltine driveway.

17. A map depicting the area Freeways and the subject property should be shown, so that the reader can see the proximity of the site to the 405 Interchange as well as limits on access points to the 405 and the 101 Freeways because of that Interchange.

18. Determinations made at the CMP stations as well as any caveats associated with their distance from the project site, including the unique intervening characteristics of the area should be discussed.

19. For the Reader to substantially better understand the relevance of the "Several public transportation opportunities in the vicinity of the project site" a map depicting the Project Site and the location of the closest stop to access each transportation line; and a chart accurately depicting the distance by foot to the nearest relevant stop, the distance by car to each stop and a discussion of parking availability (e.g. free lot, paid lot, limited or unlimited street parking), the headways between buses during Rush Hours, and the unique time limit for the hours of operation of the Dash System; and, the typical process and time frame that it would take a resident of the property to use public transit, including reaching other modes of transportation (e.g. Dash bus to reach Orange Line) to travel to Downtown Los Angeles, Westwood, Warner Center, and Van Nuys Civic Center. Provision of the publically available bus routes and timetables in Appendix D of the Traffic Impact Analysis is not sufficient to demonstrate the feasibility of the use of these various lines. Without the provision of this information in the document, the Reader would assume that the users of the site would merely need to step outside their door and have convenient and immediate access to ten lines of transit and easy connection to other lines, when in reality, only Metro Route 155 will provide around the clock service to and from the site in an easily accessible manner.

20. The document should provide documentation as to the typical distance (all ages) a person is willing to walk to a public transit access point. I believe that it is under one half mile.

21. A graphic depicting the existing project site, as well as the offsite traffic characteristics that influence access to/from the site (e.g., access points at the site; turn pockets for north and southbound Hazeltine; turn pockets for access to south driveway of Fashion Square parking structure; driveways for uses on the opposite side of the street on Hazeltine and Riverside; turn pockets for east and westbound Riverside; turn pocket at Calhoun and to the project site along Riverside; the existing street parking on the perimeter of the site as well as on the opposite side of the streets from the Project; the existing sidewalk on the southwest corner of Riverside/Hazeltine and Riverside/Woodman, information that would precisely depict transportation information) should be included in the document so that the reader can compare the existing to the proposed traffic pattern associated with the project site.

22. Analyzed Intersections should have included: Valleyheart/Hazeltine, where it is currently difficult from which to make a left to northbound Hazeltine; Stansbury/Riverside at the turn pocket into the project site; Hazeltine/Milbank which take motorists to Milbank/Beverly Glen accessing Beverly Glen to/from Westwood and UCLA; and Ventura/Beverly Glen, as stated above). It should be noted that Hazeltine is a preferred route to locations south and north of the 101 Freeway, because it has no Freeway Ramps, as does Woodman and Van Nuys.

23. Since on the ground observations have proven otherwise, it is suggested that the intersection analysis for Riverside/Van Nuys and the 101 Freeway Ramps at Van Nuys be re-evaluated. It is possible that the equipment was placed at a non-representative location or some other error occurred. Even on paper, the discrepancy as to what is occurring at Woodman Ramps and the 101 Freeway Ramps make the Van Nuys Ramp and Van Nuys/Riverside information seem suspect.

24. While indeed Hazeltine is marked as a "Network Connector" in the "2010 Bicycle Plan," it should be noted that the route is unsafe for a bicyclist to use other than by riding in the sidewalk, which could conflict with pedestrian travel on that same sidewalk. While all of Hazeltine is a difficult route for bike travel, the area between Riverside and the 101 Freeway is dangerous because of all the driveway and vehicle turning into different directions from both sides of the street there.

25. An Alternative Transit System Analysis (page IV.1-26) should be provided, because the numbers do not seem realistic for the assignment of average vehicle occupancy and the use of seven percent of the total project



trips will be using public transit. While the 7% of users travelling by public transit is a laudable goal, it is not supported by any plans or studies. The number is in reality about 3% and this information has been based on CalTrans and SCAG studies (RTP). Furthermore, limiting the assessment of the use of existing transit lines in terms of whether or not the lines could accommodate the Project's transit demand is useless unless the Reader knows not only the historical (and not the goal) data for Public Transit use, but also, the likelihood of the demand using that line, tempered by the convenience of the access to the line, the convenience to true destinations or starting points, the hours of operation of the line in the case of the Dash, the headways between buses/subway, and the time that it would take to reach a logical destination/starting point for each line. An outline of information that would assist in this presentation of information is outlined above.

26. A legible site plan should be provided that shows all the topics addressed in Item 21, above, after the implementation of the project. For instance, the Reader would realize that no longer would street parking be provided on portions of the Riverside frontage, that sidewalks and landscaping would be removed to implement construction of Right Turn Only lanes along Riverside at Hazeltine and at Woodman; and the reader would realize the lack of probability of the bus stop on the west side of Riverside, at Woodman, being moved to the east side of street because it would cause significant hardship for the business owners there as well as congestion as drivers would wait to access the gasoline station parking lot blocked by a bus.

27. A site plan for the Woodman proposed lane modifications should be provided as it was for Hazeltine Avenue (see Figure IV.1-2). At a minimum the property owner of that corner parcel should be made aware of the potential impacts of that design (as mitigation for another property) that will remove a transit stop from in front of his property, potentially will conflict with the only opportunity to turn left from the property to westbound Riverside, and the loss of his landscaped section in that area.

28. Each issue raised in prior comments, as to intersections, the lack of useful traffic counts to reflect the operation of the nearby Mall, the lack of adequate public transit, bike travel, and any other matter raised, herein, should be addressed in every segment of this section of the DEIR.

29. The Transportation/Traffic impacts of this project, especially if adequate information is added to the DEIR, as described above, will be significant not only at the cited intersection, but at intersections where information was lacking and/or incorrect. There should be no credit for Transit or bike use, given the poor access to useful transit lines and that the only routes that are safe are in an east west direction.

## **Appendix G: Appendix G Memorandum of Understanding, Los Angeles Department of Transportation Assessment Letter, and Traffic Impact Analysis**

### **A. Memorandum of Understanding**

1. It should be noted that the document state no trip credits for transit use, Transportation Demand Management, Existing Active Land Use, and Previous Land Use. In reviewing the document, it will evident that some of these credits were used (which even if there were measures implemented to off-set impacts set by them (e.g, not permitting occupation of space that would put the project into a place of significance) the impact of the building itself would remain (i.e., the project would be smaller structurally if the credits were not granted, even conditionally).

### **B. Los Angeles Department of Transportation Assessment Letter**

1. The comment in the letter's first paragraph, that "The project related impact can be mitigated to a less than significant impact" without citing what it would take to implement the level of insignificant is inconsistent with information in the Traffic Impact Analysis that focuses on the significant impact of the project if mitigation cannot be provided at the intersection of Woodman/Riverside, including the movement of a bus stop.

2. The determination by DOT is based on a faulty Traffic Impact Analysis report which is discussed in the Transportation/Traffic review above, as well as comments that will be provided for the actual Analysis to follow.

3. The DOT letter references credits associated with the application of TDM strategies, though the MOU with that department says that those credits are not to be used for this project. Providing these credits with the proviso that if in the counts are not as predicted, the leasable space will be removed for use for the project, creates issues related to overbuilding for site, a chance for blight in those areas, and does not represent good planning.

4. There is no comment about the likely safety issues and congestion caused by allowing left turns into the site at its north driveway which will seriously impact the flow of traffic using the left turn pockets on Hazeltine to westbound Riverside and into the Fashion Square Mall south driveway into a parking structure.

5. The Letter speaks about an Alternative Option project 5, as the preferred option, as well as Options 2a and 2b. While some aspects of these Alternatives are included in the DEIR, there are no such Alternatives identical to these in the DEIR. Also, the Letter does not explain with sufficient information, why Option 5 is preferred with regard to potential traffic impacts.

### **C. Traffic Impact Analysis**

1. A significant amount of commentary has been provided, herein, regarding the lack of sufficient information provided in the DEIR on this topic. Time and efficiency prevents this Reader from repeating much of that information, however, it should be noted that a lack of comment about a topic in this section does not deem approval of the information. Relevant commentary made about issues, presented about topics in this section, however, cited in other sections of this Commentary, should be applied as appropriate to the discussion of the topics in this section.

2. It should be explained why if the AM Peak hour significant impact at Hazeltine/Riverside is not reduced to a level of insignificance, even with mitigation, this is not cited in noteworthy parts of the DOT Letter, in this Study, or in the body of the DEIR. DEIRs are not supposed to be written in a manner that issues about the project are deeply hidden and inconsistently reported in the document.

3. Would the impacts of the project change if the north driveway on the site is not opened to left turn from northbound Hazeltine?

4. Though not cited in the DOT letter, it states here that if the bus stop cannot be moved, the impact at the Woodman/Riverside intersection would remain significant.

5. Left turning phasing is already available at most of the intersections along Riverside at Hazeltine and Woodman. The use of that technology may already exist near the site, and it should be verified, and what occurs if the no longer remains a mitigation measure because it exists already?

6. There is not supposed to be any credits for multi-nodal trips not only because of what was stated in the MOU but when the facts are laid out about Public Transit services to the area, it will be shown to be likely unused.

7. The distance to the nearest direct on-ramp for the various Freeways identified in the Analysis should be reviewed or added where not provided. This reader found some information was incorrect.

8. On the Project Distribution Percentage Map (Figure 4) it is hard to believe that no trips from the project will go south on Hazeltine – where the major supermarket is located as well as the access to Beverly Glen (canyon to West Los Angeles) is located, as well as a variety of shops, restaurants, and other facilities.

9. The photos of the intersections of the streets affected by the project (in the 100s and after the Standard Street Section Diagrams) are almost useless. They do not name intersections, they do not show proposed improvement, they do not name landmarks, and they are outdated (the structure depicted at the intersection of Ventura/Hazeltine) was removed prior to the February 2014 date of the Analysis. The store built in its place was opened to the public two months later.

### **V. Alternatives**

1. In the discussion of this section of the document, the applicant claims that this project cannot be moved elsewhere because the project is closely tied to the Sunkist Building on-site. This is questionable given the fact that the proposed structures of the project will basically obstruct views of the Building from every viewpoint, it will strip the property of the sylvan appearance of the site, and one does not need to be an architect to see that the proposed structures, but for a reliance of horizontal lines, does little to complement the Sunkist Building. Suffice it to say that the project, as proposed, could be moved to another site. Add to this latter comments, the project is seriously in conflict with the “atmosphere” of the area and will significantly impact the quality of life there, including creating significant traffic impacts at important intersections and more.

2 The discussion of Alternatives is lacking because they only speak to the variations in the size of the square footage (residential, commercial) but provides no alternatives with regard to orientation, distribution, and heights of buildings. Furthermore, in describing alternative projects, the Applicant provides only modest reduction in unit number and in commercial square footage and little or no change in building heights. These are some of the key areas will significant impacts of the projects will occur.

3. An Alternative should be included in the EIR that: provides building heights and orientation that do not obstruct views of the Sunkist Building from all sides; is consistent in its massing with nearby other multi-residential buildings (and not use the Bloomingdale's building height as a benchmark may be 25 or more feet taller than nearby multi-residential uses), and that will the corrections to the Transportation/Traffic Analysis, does not create significant impacts along area streets and intersections.

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From: holly <[holredd@yahoo.com](mailto:holredd@yahoo.com)>  
Date: Fri, Sep 9, 2016 at 10:11 PM  
Subject: Sherman Oaks Overdevelopment  
To: "[Sarah.molina-pearson@lacity.org](mailto:Sarah.molina-pearson@lacity.org)" <[Sarah.molina-pearson@lacity.org](mailto:Sarah.molina-pearson@lacity.org)>, "[cd4.issues@lacity.org](mailto:cd4.issues@lacity.org)" <[cd4.issues@lacity.org](mailto:cd4.issues@lacity.org)>

To: Sarah Molina-Pearson, City of Los Angeles  
Councilman David Ryu

I am so disturbed by all of this overdevelopment in our area and Los Angeles as a whole. In the 15 years I've lived in Sherman Oaks, it has become increasingly unpleasant to go anywhere at any waking hour.

IT IS IMPERATIVE that you do everything possible on behalf of the homeowners/residents of Sherman Oaks to mitigate the significant negative impacts of SUNKIST ICON by REDUCING the size of the proposed development .

Additionally, a 30-day extension is requested for the DEIR public comment window in order to allow sufficient time for public review.

Specifically, adding 300 MORE apartment units (and an estimated 900 people and 600 more cars!) to our area is OVER-development! Especially since IMT has recently built 6 massively-huge apartment complexes, three or more stories tall, and some being a city block long--ALL WITHIN A 3 MILE RADIUS HERE IN SHERMAN OAKS!!

I understand that these recently-built IMT developments are NOT at full occupancy, making the addition of 300 MORE in the same area OVERDEVELOPMENT, unneeded, and undesirable.

Huge, multiple negative impacts to our community will result, namely:

WORSENING OF TRAFFIC

WORSENING OF AIR POLLUTION AND NOISE

LESSENING OF AIR QUALITY (and the destruction of many mature trees!)

DEEPER STRAINS TO PUBLIC SERVICES (police, fire, hospital, etc.), WHICH ARE ALREADY INADEQUATE!

This development MUST be significantly downsized to being either JUST COMMERCIAL or COMMERCIAL PLUS NO MORE THAN 50 APARTMENT UNITS.

300 MORE APARTMENTS IS ABSOLUTELY UNWARRANTED, and if built, would be done so at the sole benefit of IMT (and city) profits--and NOT in the service of the well-being of our community and its residents.

Thank you for your immediate and full cooperation on behalf of your constituents in Sherman Oaks!

Sincerely,  
Holly Brown

*"Our lives begin to end the day we become silent about things that matter."*  
~Martin Luther King Jr.

*"To avoid causing terror to living beings, let the disciple refrain from eating meat."* ~Buddha

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From: **Patty Burnstein** <[daminisue@gmail.com](mailto:daminisue@gmail.com)>  
Date: Thu, Sep 22, 2016 at 12:37 PM  
Subject: Sunkist Project  
To: [sarah.molina-pearson@lacity.org](mailto:sarah.molina-pearson@lacity.org)

Hello Sarah,

I am a resident of Sherman Oaks and have been for over 20 years. Every year there is more and more development and every year the traffic gets worse and the character of the Valley changes for the worse. Most of us like the fact that it has been quieter on this side of the hill, there has been less congestion and it's just less crazy than over the hill. Please consider this when determining how large the Sunkist project will be allowed to be. This development is going to make traffic so much worse on both Riverside and Hazeltine and it's hard enough getting in to Trader Joe's parking lot now. Please, please consider the citizens and not just the developers in this decision.

Thank you

Patty Burnstein

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From: **Tom Capps** <[trcapps@gmail.com](mailto:trcapps@gmail.com)>  
Date: Tue, Sep 27, 2016 at 4:26 PM  
Subject: ICON SUNKIST ENV 2014-1362-EIR  
To: [sarah.molina-pearson@lacity.org](mailto:sarah.molina-pearson@lacity.org)

COMMENTS TO EIR  
ICON SUNKIST 14130 Riverside Drive Sherman Oaks 91423

Dear Ms. Sarah Molina-Pearson:

I reside at 5101 Mammoth Avenue which is located between Woodman Avenue and Van Nuys Boulevard and between Riverside Drive and Magnolia. I have been a resident at this address since 1987 and a resident of the San Fernando Valley for my entire life.

I have no qualifications as an expert in the review of an Environmental Impact Report. However, as a long-time resident of the community, I have available intimate knowledge of the traffic conditions, past, current and future projects and other intangibles that I believe are invaluable to any planner reviewing this project. I also have made it a personal goal to familiarize myself with discretionary projects within my local boundaries including this project by attending hearings, scoping meetings and joining the board of the Sherman Oaks Council. My comments are personal and do not represent the viewpoint of any organization.

I want to thank you for extending the time period for public comment on this project. Any review of such a comprehensive document as the ICON Sunkist EIR is a challenge for any layman. I have reviewed this document to the best of my ability to ascertain the suitability of the project for this site and the proposed mitigations measures. I have many concerns as to the aesthetics, landscaping, traffic studies, traffic mitigation measures, transit usage and planned open space to name a few.

I find that the proposed plan and alternatives are incomplete and more alternatives that could be of a lesser density, mix of use and provide mitigate traffic have not been presented. The closest alternative that could even be close to acceptable is Alternative 2A as represented in APPENDIX G of the Traffic Study.

The traffic study is lacking in detailed diagrams to present traffic flow of vehicles into the proposed project from Hazeltine Avenue. Ratings of intersections that are rated "A" appear faulty. My personal and intimate knowledge of these intersections which includes Van Nuys Blvd and Riverside counters the traffic study. Further, traffic mitigation proposals include use of Trip Credits, TDM and Pass By Trips which are not allowed by direction of the Department of Transportation MOU. The time and duration of the traffic study does not include traffic generated by Westfield Fashion Square during holiday periods.

Parking is mitigated by use of bicycle lockers. However, Hazeltine Avenue is 85 feet wide and can not safely support the addition of bicycle lanes as will Riverside Drive if the dedicated right hand turn lane is added. A reliance on a reduction of trip counts and parking by bicycle ridership is unrealistic.

Instead of making any further direct comments to you, I would refer you to the comments which are submitted by Wendy Brogin. I have reviewed her comments and I am substantially in agreement to her comments and recommendations for the draft environmental report submitted by ICON Sunkist. Ms. Brogin is a respected land use expert and resident of the Sherman Oaks community. I find her comments to be thoughtful, balanced and substantive. Your attention to her comments and recommendations must be seriously considered.

Based upon Ms. Brogin's review of the EIR and my own investigations, I find that there is no overriding consideration for the project to be approved for a change in zoning. There is no community benefit and no reason to allow a hardship for the approval of this project.

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Tom Capps

[trcapps@gmail.com](mailto:trcapps@gmail.com)

C [818-601-7971](tel:818-601-7971)



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From: **Kristi Clainos** <[kclainos@hotmail.com](mailto:kclainos@hotmail.com)>  
Date: Tue, Sep 27, 2016 at 4:11 PM  
Subject: Sunkist/IMT  
To: "[sarah.molina-pearson@lacity.org](mailto:sarah.molina-pearson@lacity.org)" <[sarah.molina-pearson@lacity.org](mailto:sarah.molina-pearson@lacity.org)>

Hi Sarah,

I am writing as a concerned resident of the fashion Square neighborhood. The project, as proposed, will significantly affect the traffic at Riverside and Woodman, and Hazeltine and Riverside, and possibly create safety hazards for pedestrians in those areas. While the DEIR does not discuss it, it will also impede traffic and turns onto Riverside and onto Hazeltine near the site.

It will also construct a wall of apartments and condos, commercial uses, and a parking structure across Riverside and Calhoun, and along Hazeltine. All this new construction will remove the mature trees that are currently on the site, and replace it with buildings that will basically hide the Sunkist Building. The public open space heralded by the project will be primarily in landscaped areas, and a small plaza near the LA River Channel - though parking for that use is not included in the project.

There are alternatives for this project that would give the developer a fair return and not significantly impact the environment and the community. A smaller project of residential uses, with a different unit count or office use could be accomplished on the property.

I am begging the city to not approve the zoning changes requested by IMT. These greedy developers have no thought or regard for the quality of life for the people who have spent their life savings to live in this neighborhood and surrounding areas. They, of course, do not live anywhere near what they are creating.

thank you for your time,

Kristi Jerome

Sent from my iPhone

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From: **Alan and Kathleen Crow** <[crowfamily@earthlink.net](mailto:crowfamily@earthlink.net)>  
Date: Sat, Sep 24, 2016 at 12:53 PM  
Subject: Sunkist/IMT Draft EIR  
To: [cd4.issues@lacity.org](mailto:cd4.issues@lacity.org), [sarah.molina-pearson@lacity.org](mailto:sarah.molina-pearson@lacity.org)

While we are generally supportive of landowners being able to realize the full potential of their property, the proposed Sunkist / IMT project at the corner of Hazeltine and Riverside in Sherman Oaks is way out of scale for the neighborhood. This project would follow a major increase in the size of the Westfield mall that already generates additional traffic. The increasing housing density in Sherman Oaks already makes it nearly impossible to cross Ventura Blvd in morning rush hour traffic, and it is undebatable fact that this project add significant congestion on Hazeltine and Riverside as well, thereby slowing commutes and adding hazards for pedestrians at all times of the day.

In addition, removing trees and replacing them with a combination of high density residential and commercial development, significantly changes the character of the neighborhood. The existing low profile office building with wider setbacks from the streets and trees both in and surrounding the parking lot do not have the same negative impact.

In summary, the Sunkist / IMT project will degrade the neighborhood and exacerbate a serious existing traffic problem in the area. We urge you to consider both the impact on the existing nearby residents as well as the entire Sherman Oaks community.

Sincerely,  
Alan & Kathleen Crow  
[818-590-8654](tel:818-590-8654)

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From: **Sandra DeBear** <[mamasan111@icloud.com](mailto:mamasan111@icloud.com)>  
Date: Wed, Aug 17, 2016 at 7:31 PM  
Subject: re:Sunkist  
To: [sarah.molina-pearson@lacity.org](mailto:sarah.molina-pearson@lacity.org)

Dear Mrs. Molina-Pearson,

I am a long time resident living on my beautiful Peach Grove St and love our area. Please reconsider building that huge apartment complex which would absolutely ruin this lovely neighborhood, what with more traffic, crime, etc. I'm sure there are other ways to use that lovely building/lot.

Thank you for your consideration.

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From: **Joyce Dillard** <[dillardjoyce@yahoo.com](mailto:dillardjoyce@yahoo.com)>  
Date: Tue, Sep 27, 2016 at 3:56 PM  
Subject: Comments DCP DEIR ICON Sherman Oaks due 9.27.2016  
To: Sarah Molina-Pearson <[sarah.molina-pearson@lacity.org](mailto:sarah.molina-pearson@lacity.org)>

NPDES permitting should include the current Orders for Construction General Permits and Municipal Separate Storm Sewers MS4 and the Enhanced Watershed Management Plans.

Joyce Dillard  
P.O. Box 31377  
Los Angeles, CA 90031

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From: **Jonathan Eldridge** <[ceqacheck@gmail.com](mailto:ceqacheck@gmail.com)>  
Date: Mon, Aug 1, 2016 at 10:33 PM  
Subject: ICON Sherman Oaks Comment  
To: [sarah.molina-pearson@lacity.org](mailto:sarah.molina-pearson@lacity.org)

Hello Sarah,

Just wanted to provide an email of positive encouragement! I make it a hobby of checking up on EIRs from time to time, and I normally go straight for AQ/Noise as those are the easiest to make sure whether the consultants are cutting corners. I was delighted to see that the noise analysis used the correct noise model (TNM) instead of the extraordinarily outdated RD-77-108 model that I keep see popping up (I just had to shoot Christina Toy Lee an email about City Market LA project using an inappropriate model - yikes!).

Good luck with your project, and glad to see some people choose to do the right thing!

-JE

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From: **Susan Emmanule** <[zsuzsupetals@gmail.com](mailto:zsuzsupetals@gmail.com)>

Date: Tue, Aug 23, 2016 at 3:20 AM

Subject: IMT's PLAN TO BUILD ON THE SUNKIST SITE

To: [sarah.molina-pearson@lacity.org](mailto:sarah.molina-pearson@lacity.org)

I understand that this company is planning to build a 300 apartment building on the site of the Sunkist Building. That means that at the very least, 300 new people will be coming and going from this spot each and every day! I can only imagine the the traffic ramifications around there. It's already crowded, with people driving back and forth across town, not to mention the people driving to the mall next door.

If it's not too late, and there is any way to stop this development, I very strongly urge you to consider shutting this project down; or, at the very least, scaling this project down to no more than 1/4th to 1/3rd the number of apartments planned. It's just too much overload for little Sherman Oaks.

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From: **Debbie Fils** <[medinscc@yahoo.com](mailto:medinscc@yahoo.com)>  
Date: Tue, Aug 16, 2016 at 10:35 PM  
Subject: Sunkist project thoughts from a Sherman Oaks Resident  
To: [sarah.molina-pearson@lacity.org](mailto:sarah.molina-pearson@lacity.org)

To Whom It May Concern:

Prior to planning any additional building and/or crowding in the area of the Hazeltine/Riverside corner, I invite you to drive down Riverside Blvd. between Van Nuys Blvd. and Woodman Ave., anytime between Thanksgiving and New Year's Day. At any other time of the year, the additional traffic from the proposed project would be inconvenient and time-consuming and destructive to our neighborhood. But, during the last two months of the year, any additional traffic on that corner will be completely dangerous. As it is, during busy times of the year, we already have traffic officers directing traffic on Hazeltine (at the corner of Riverside) because the intersection gets completely blocked from all of the traffic congestion. In addition, all businesses will lose foot traffic because absolutely no one will go anywhere near that area. Already, as part of our daily route, my family and I almost always use the Woodman 101 Freeway onramp and offramp because the Hazeltine intersection is so busy and over-crowded, that it's not convenient to drive to/from the Van Nuys Blvd. freeway access. Bottom line: you are adding more congestion to an already over-crowded area. I truly hope that you will either reduce the scope of your proposal or move it to somewhere else.

I feel very strongly about keeping our neighborhood safe and livable. We have lived in this house for 20 years, and in another house in Sherman Oaks for the 9 years prior to that; our goal is to stay here for many more years. If you would like to have more information from a Sherman Oaks "local", I would be more than happy to speak with you. My phone number is [818-501-7077](tel:818-501-7077).

Thank you,

Deborah J. Fils

4859 Matilija Ave.

Sherman Oaks, CA 91423



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From: **Debbie Fils** <[medinscc@yahoo.com](mailto:medinscc@yahoo.com)>  
Date: Fri, Aug 26, 2016 at 5:23 PM  
Subject: Sunkist project  
To: Sarah Molina-Pearson <[sarah.molina-pearson@lacity.org](mailto:sarah.molina-pearson@lacity.org)>

Ms. Molina-Pearson,

Please grant us a 30-day extension (at least), for the comment of the DEIR for the Sunkist/IMT project -- Case No. ENV2014-1362-EIR icon Sherman Oaks (14130 AND 14154 Riverside Drive Sherman Oaks).

We already have way too many apartments and that intersection is already way too busy for us to have anymore congestion -- either in human form, or automotive form, or in pollutant form.

Thank you,

Deborah J. Fils

4859 Matilija Ave.

Sherman Oaks, CA 91423

[818-501-7077](tel:818-501-7077)

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From: **Heather F** <[hforziati@gmail.com](mailto:hforziati@gmail.com)>  
Date: Tue, Sep 27, 2016 at 1:11 AM  
Subject: ICON Sherman Oaks DEIR  
To: [sarah.molina-pearson@lacity.org](mailto:sarah.molina-pearson@lacity.org)  
Cc: [diana.kitching@lacity.org](mailto:diana.kitching@lacity.org), [david.ryu@lacity.org](mailto:david.ryu@lacity.org)

Dear Ms. Molina-Pearson,

Attached, please find my letter to express concerns regarding the DEIR for the ICON Project in Sherman Oaks.

I appreciate you taking the time to review it and bringing the feedback of the community members into account as you assess the DEIR.

Please let me know if you have any questions.

Best,

Heather Forziati  
4853 Calhoun Ave.  
Sherman Oaks, CA

September 25, 2016

TO: City of Los Angeles Department of City Planning

ATTN: Sarah Molina-Pearson, Planning Associate, LA Department of City Planning  
200 N. Spring Street, Room 750  
Los Angeles, CA 90012

CC: David Ryu, Los Angeles City Council, District 4  
Diana Kitching, Planning Associate, LA Department of City Planning

FROM: Heather Forziati  
4853 Calhoun Avenue  
Sherman Oaks, CA 91423

SUBJECT: ICON Sherman Oaks DEIR  
RE: City Case No. ENV-2014-1362-EIR SCH. No. 2014071001

Dear Ms. Molina-Pearson,

I am writing to comment on the Draft Environmental Impact Report (DEIR) for the ICON Project in Sherman Oaks.

I am very concerned about the scope of the ICON Project in general and the DEIR specifically, in regard to several key areas in its analysis. It has specific flaws in its evaluations and conclusions that render it inadequate for accurate environmental review and comment. These include its potential adverse impacts, adequacy of mitigation and compensation, and evaluation of project alternatives. These flaws and failures to properly define and specify, to be objective, and to quantify many statements in the DEIR could lead to overlooking serious and potentially negative impact to the community economics and quality of life, not to mention unforeseen costs to the city as a result.

Thus, I plea that the CEQA process for this project not proceed to the Final EIR (FEIR) without revised evaluations and recirculation of a revised or supplemental DEIR.

Specific comments follow below.

Best,  
Heather Forziati

Specific comments:

samples—

**2-3/5 4. Land Use and Zoning a. Van Nuys—North Sherman Oaks Community Plan** The Project Site is located...(Community Plan) area that was adopted in September 1998....designates the Project Site for Community Commercial land uses....5/1...encompass a broad range of retail and service uses...Generally, these uses are located within one mile of residents. The Community Commercial land use designation corresponds with the C1.5..., C2..., CR..., C4..., RAS3..., and RAS4...zones in the LAMC.

***No plan of almost 20 years without an update can reflect the current land use planning and development issues and generally is not acceptable for state compliances, e.g., CEQA.***

***No use/demand/residential analyses of one mile radius has been provided and therefore no factual information supports/rejects the statement.***

***Given the lack of planning context, the proposed project must be considered in a broader context and the project and all similar properties along Riverside Dr. must be planned as a program (e.g., specific corridor plan supplementing the eventual re-development of the current, out dated Community Plan.***

***Revise the DEIR and include the proposed project as part of a Riverside Dr. Specific Plan.***

**2-6/1 5. Project Objectives** Section...(CEQA) Guidelines states that the project description shall contain "a statement of the objectives sought by the proposed project."...further states that "the statement of objectives should include the underlying purpose of the project."...is to create a high-quality, mixed-use development...integrated with neighborhood-serving commercial and recreational uses....specific objectives... below.

***No definition, enumeration, or quantification of "High Quality" or "neighborhood-serving" is provided in the DEIR, and therefore no proposed development would appear to meet this stated goal.***

***As the objectives are totally inadequate or incomplete, development of the project and the alternatives are rendered inadequate if not incomplete. Without the objectives, any development of a public comment-alternative will suffer from the same issues.***

***Revise the DEIR and include the adequately defined, enumerated, and quantified objectives herein and use for the development of adequate alternatives and their comparisons, including a more comprehensive specific corridor plan.***

Integrate new housing opportunities with neighborhood-serving commercial uses, recreational uses and existing office uses;

***No definition, enumeration, or quantification of "neighborhood-serving" is provided in the DEIR and therefore no proposed development would appear to meet this stated objective.***

***Revise the DEIR and include the adequately defined, enumerated, and quantified objectives herein and use for the development of adequate alternatives and their comparisons, including a more comprehensive specific corridor plan.***

Maximize new housing units on the Project Site to help meet the market demand for new housing in the region and in the City of Los Angeles;

***Objective is unclear as to region of LACo or LACity.***

***No market demand information has been provided to support/refute compliance of the project or any alternatives.***

***No definition, enumeration, or quantification of "neighborhood-serving" is provided in the DEIR, and therefore no proposed development would appear to meet this stated objective.***

***Revise the DEIR and include the adequately defined, enumerated, and quantified objectives herein and use for the development of adequate alternatives and their comparisons, including a more comprehensive specific corridor plan.***

Provide convenient neighborhood-serving commercial uses and open space within walking distance of existing off-site residential and commercial uses, proposed on-site residential uses and on and off-site office uses;

***Unclear as to whether the walking distance is related to the earlier use of "one mile"; revise and clarify. No definition, enumeration, or quantification of "neighborhood-serving" is provided in the DEIR, and therefore no proposed development would appear to meet this stated objective. Revise the DEIR and include the adequately defined, enumerated, and quantified objectives herein and use***

**for the development of adequate alternatives and their comparisons, including a more comprehensive specific corridor plan.**

Create an aesthetically attractive, high-quality design that engages the Los Angeles River and complements the existing Sunkist Building;

***No definition, enumeration, or quantification of "aesthetically attractive", "high-quality design", and "neighborhood-serving" is provided in the DEIR, and therefore no proposed development would appear to meet this stated objective. Revise the DEIR and include the adequately defined, enumerated, and quantified objectives herein and use for the development of adequate alternatives and their comparisons, including a more comprehensive specific corridor plan.***

Develop a mixed-use project at the residential density and intensity consistent with the zones permitted by the Project Site's underlying Community Commercial land use...by the Van Nuys–North Sherman Oaks Community Plan;

***No definition, enumeration, or quantification of "consistent with" or "Community Commercial" (rather than "neighborhood serving") is provided in the DEIR, and therefore no proposed development would appear to meet this stated objective. Revise the DEIR and include the adequately defined, enumerated, and quantified objectives herein and use for the development of adequate alternatives and their comparisons, including a more comprehensive specific corridor plan.***

Enhance the Project Site's walkability and public accessibility through the introduction of street-fronting neighborhood-serving commercial uses, and new plazas and walkways that connect with the LA Riverwalk;

***The existing and proposed frontages cannot be considered as "street-fronting" compared to the more typical street-fronting commercial uses found throughout the Valley.***

***No definition, enumeration, or quantification of "walkability and public accessibility" is provided in the DEIR, and therefore no proposed development would appear to meet this stated objective.***

Retain...

Provide vehicle and bicycle parking that satisfies anticipated demand on the Project Site with direct access to the proposed residential and commercial uses, existing office uses and the LA River walk; and

***No definition, enumeration, or quantification of "satisfies anticipated demand" is provided in the DEIR, and therefore no proposed development would appear to meet this stated objective.***

Provide a sustainable development consistent with principles of smart growth...sustainable design features, mixed uses, infill development, and walkability.

***No definition, enumeration, or quantification of "sustainable development, principles, smart growth...sustainable design features, and walkability" is provided in the DEIR, and therefore no proposed development would appear to meet this stated objective.***

***Revise the DEIR "project objectives" entirely and include the adequately defined, enumerated, and quantified objectives herein and use for the development of adequate alternatives and their comparisons, including a more comprehensive specific corridor plan.***

**4.D-21/2 3. Project Impacts a. Methodology** The Historical Resource Assessment is based, in part, on historic permits for the Project Site, Sanborn Fire Insurance maps, historic photographs, aerial photos and site plans, local histories, and California State Historic Resources Inventory for Los Angeles County.

Research

Primary and secondary source materials were consulted for the development of applicable historic contexts. For a complete list of sources, please see bibliography. Sources generally included:

Appdx. 4/1

- Aerial photographs

***References to aerial photos is render totally inadequate and incomplete by the absence of known and widely used US Army Air Service Aerial Photos of LA in 1923 and 1928 which may or may not confirm the review of valuable historic land uses of the project site.***

**Revise the DEIR and include the adequately reviewed historic aerial photos. Revision must be included both for Cultural Resources and for Hazards and Hazardous Wastes (e.g., agricultural pesticides and ground contamination).**

**6-13/2** The diversity of uses...support the City's housing needs and enhance the employment base of the Van Nuys—North Sherman Oaks area....foster continued economic investment in the area while meeting the needs of local residents....would also attract new businesses to the area,...continue to provide office and desirable employment opportunities to the community.

**6-19/4 d. Conclusion** Overall, the Project would be consistent with the growth forecast for the City of Los Angeles Subregion and would be consistent with regional policies to reduce urban sprawl, efficiently utilize existing infrastructure, reduce regional congestion, and improve air quality through the reduction of vehicle miles traveled.

**No definition, enumeration, or quantification of numerous terms (see above) is provided in the DEIR and therefore the public cannot be expected to provide reasonable review and comment regarding the development and local effect to meet these "targets".**

**References to economics, businesses, investments, "area" or "community" or "local", etc. render the section totally inadequate and incomplete without the publicly access definitions, delineation, and quantifications, required by CEQA and common sense and reason which may or may not confirm the review of valuable aspects of the proposed project.**

**Revise the DEIR and include the adequately described social/economic/employment evaluations to support such claims. Revision must be included in all sections and a socio-economic section must be provided, perhaps along with Growth Inducements.**

#### **THE F....WORD**

**5-3/1** According to the CEQA Guidelines,...detailed consideration is the alternative's failure to meet most of the basic project objectives, the alternative's infeasibility, or the alternative's inability to avoid significant environmental impacts. Alternatives to the Project that have been considered and rejected as infeasible include:

**No feasibilities/infeasibilities has been defined nor quantified, especially economically, and generally is not acceptable for state compliances, e.g., CEQA.**

**Therefore the DEIR must be withdrawn, revised, and recirculated with adequate and complete definition, enumeration, and quantifications to provide adequate and complete basis for any statements with the "F...Word"**

**5-4/2** Based on the above, an alternative site is not considered feasible as it is not expected that the Project Applicant can reasonably acquire, control or have access to a suitable alternative site that..., this alternative was rejected from further consideration.

**6-8/3** No feasible noise barrier

**6-10/1** No feasible mitigation measures...could be implemented...

**6-10/2** There are no feasible mitigation measures...

**6-14/2** Among those alternatives, no feasible alternative was identified that would eliminate all of the Project's significant and unavoidable impacts with the exception of the No Project Alternative.

**6-14/2** ...No Project Alternative would avoid all of the Project's significant environmental impacts...would not meet the underlying purpose of the Project or any of the Project objectives, and is not considered a feasible development alternative.

**6-14/2** ...numerous mitigation measures that reduce the potential impacts associated with the Project to the extent feasible.

**Feasibilities/infeasibilities have not been defined nor quantified, especially economically, and generally such usage in a DEIR is not acceptable for state compliances, e.g., CEQA.**

**Therefore the DEIR must be withdrawn and revised and recirculated with adequate and complete definition, enumeration, and quantifications to provide adequate and complete basis for any statements with the "F...Word"**

**6-14/2** Although the No Project Alternative would avoid the Project's significant and unavoidable cumulative impacts...and create a significant unavoidable land use impact.

**6-14/2** ...Project...satisfies the Project objectives to a substantially greater degree than any of the proposed alternatives.

***No definition, enumeration, or quantification of "satisfaction" for any objective has been provided in the DEIR***

***Revise the DEIR "project objectives" and the alternatives comparisons entirely and include the adequately defined, enumerated, and quantified comparisons of objectives for adequate alternatives, including a more comprehensive specific corridor plan.***

**6-14/2** ...Project presents several benefits that counterbalance the limited adverse effects...on the environment.

***The "limited adverse effects" do not appear to be objectively reviewed compared to earlier statements: "Project's significant and unavoidable cumulative impacts" and "create a significant unavoidable land use impact".***

***Revise the DEIR.***

**6-14/2** ...No Project Alternative would avoid all of the Project's significant environmental impacts...would not meet the underlying purpose of the Project or any of the Project objectives, and is not considered a feasible development alternative.

***No "underlying purpose" has been stated in the DEIR, nor have the objectives been shown to be related to or derived from such a Goal or Purpose.***

***Revise the DEIR.***



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From: **Richie Rich** <[richardgasparian@gmail.com](mailto:richardgasparian@gmail.com)>  
Date: Tue, Aug 16, 2016 at 10:31 PM  
Subject: Sunkist project...  
To: [sarah.molina-pearson@lacity.org](mailto:sarah.molina-pearson@lacity.org)

Ms. Molina-Pearson,

I am writing to voice my protest to the Sunkist project. I have been a homeowner in this neighborhood for twenty years. I am concerned about degrading home values, traffic congestion, and loss of quality of life, which will surely be the result of this mega expansion.

I am told that L.A. city personnel don't care about how the residents feel, and that they are in bed with developers. Is this the case?

Sincerely,  
Richard Gasparian

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From: **BLG** <[njtsca@yahoo.com](mailto:njtsca@yahoo.com)>  
Date: Tue, Sep 6, 2016 at 5:04 PM  
Subject: Sunkist-IMT project  
To: [sarah.molina-pearson@lacity.org](mailto:sarah.molina-pearson@lacity.org)

To Whom: My husband & I are Sherman Oaks residents for more than 30 years and we are most concerned about the proposed changes to the Sunkist Icon property at Riverside & Hazeltine.

The intersection is already dangerous and the Fashion Sq. Mall and Trader Joe's are already providing needed retail and traffic at the maximum.

We object to non-educational facilities and non-Senior resident facilities, so we would like to be apprised of all available documents.

Thank you for your attention. Email: [njtsca@yahoo.com](mailto:njtsca@yahoo.com)  
Mr. & Mrs. Larry Gelman  
5121 Greenbush Ave, 91423

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From: **Michael Gerety** <[michaelgerety6@gmail.com](mailto:michaelgerety6@gmail.com)>  
Date: Wed, Aug 17, 2016 at 4:15 PM  
Subject: Sherman Oaks Sunkist property  
To: [sarah.molina-pearson@lacity.org](mailto:sarah.molina-pearson@lacity.org)

Please - no apartments on the Sunkist site in Sherman Oaks!

Thomas Gerety  
5339 Norwich Ave.  
Sherman Oaks, ca 91411

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From: <[bonsaient@aol.com](mailto:bonsaient@aol.com)>  
Date: Mon, Sep 26, 2016 at 5:46 PM  
Subject: ICON SHERMAN OAKS - CITY CASE NO. ENV-2014-1362-EIR  
To: [sarah.molina-pearson@lacity.org](mailto:sarah.molina-pearson@lacity.org)  
Cc: [david.ryu@lacity.org](mailto:david.ryu@lacity.org)

Dear Ms. Molina-Pearson:

We have reviewed the Draft EIR for the ICON Sherman Oaks project . As Sherman Oaks homeowners who live in the Fashion Square neighborhood, we will be directly impacted by the project.

Below are our comments and questions in no specific order:

What types of restaurants/bars (fast food or full service) are expected? What are the operating hours?

Will there be penalties for construction delays in excess of the 33 month construction period?

What are the street side landscaping plans?

Will there be low income housing? If so, how many units?

Will traffic lights be placed at entrances and exits? And if so, will IMT Capital bare the cost of installation and maintenance?

Will noise and pollution equipment be installed on the site during construction and will results be posted regularly?

What is the effect on fire, police, public transportation and sewage on the area?

What is the effect on entrance ramps to the 101? Will IMT bear the cost of study and adjustment of ramp stop lights?

Keeping the Sunkist Building sounds like a good idea on the surface. It's an iconic structure that has history, is interesting, unique and adds architectural color to an area which is dominated by contemporary buildings that are, aesthetically speaking, boxes on boxes. However, the lack of detail and information on what the plans are in terms of use are very troubling. What type of businesses would occupy the building? What are their hours of operation? How much traffic would they generate in terms of visitors?

Keeping the Sunkist Building seems to have been done to placate people. Either there are no plans. Or there are plans the developer does not want to disclose. It's one or the other. Much more needs to be disclosed and/or determined before anyone could make an educated decision regarding this portion of the project.

Adding more restaurants sounds like a good idea on the surface too. People in the neighborhood could use the restaurants and benefit as well as the tenants in the apartments. However, a Subway or a MacDonalds could qualify as a "restaurant." Two or three stores of this kind with the possibility of a convenience store as a tenant would constitute a Strip Mall and with any Strip Mall there could be 50-100 cars turning in and out of these businesses in the period of a couple of hours. The wear and tear would be enormous. In addition, Strip Malls drive down the property values in an area, attract crime and vagrancy and are known for being trashy and unsanitary. Sherman Oaks does not need this especially since it would be literally feet away from residential neighborhoods and several schools.

Overall , what is described is a mess. It's a mix of residential, business and retail designed and built by residential builders. Specifically, builders who build apartment buildings that look pre-fab.

Have these builders built a mixed use facility such as this before? If so, what is the history? Has it been successful or did it fail and if so, how? What is the history of mixed use facilities such as this built in residential neighborhoods by other builders? What is the impact on crime? Traffic? Noise? Pollution?

**It is obvious that the project has been designed to please everyone, but will please no one.**

It would be wise to change this project so that it is for business purposes only (offices like it is now) OR retail that closes in the evening like the Fashion Square Mall OR residential (apartments or condos) with fewer units so as not to overbuild on the 8.3 acre lot.

By doing the above, traffic patterns and the change in crime are measurable and have been demonstrated.

For example, what was the impact on traffic and crime when the Sunkist Building was operational and currently with Fashion Square Mall as well as with condo and apartment projects of comparable size? These facts are known.

However, one doesn't have to be a Social Scientist or a Traffic Analyst to know that creating a mixed use facility that is operational for extended hours extenuates the problems associated with traffic and crime.

People drawn to the development for retail use are transient. A transient population usually contains a criminal element. Reducing criminal activities is easier with limited hours and restrictions to access as is the case with the Fashion Square Mall. However, by design, this mixed use facility is too easily accessible and the hours of operation will be 24/7 because of the residential portion. Therefore, it will be impossible to provide security in the same manner as the Mall.

In addition, the current plans are for a project that is "overbuilt."

As proposed, the project is too many bodies in one small space on an ongoing basis.

**For our purposes, we would prefer maintaining the Sunkist building and having it repurposed as office space, but under no circumstances, mixing residential with retail. It's a recipe for disaster.**

Sincerely,

James A. Goldschlager  
Janet E. Loftis  
14007 Morrison Street  
Sherman Oaks, California 91423

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From: **alexandra gross** <[alexagross@hotmail.com](mailto:alexagross@hotmail.com)>  
Date: Sat, Aug 20, 2016 at 1:30 AM  
Subject: sunkist  
To: "[sarah.molina-pearson@lacity.org](mailto:sarah.molina-pearson@lacity.org)" <[sarah.molina-pearson@lacity.org](mailto:sarah.molina-pearson@lacity.org)>

More people more cars, more everything. Can we not scale down plans. There is already so much congestion at that particular intersection, not to mention the accidents at Hazeltine and moorpark frequently. We need to pay attention to the quality of life of the people are already here. Enough! Thank you.

Sent from [Mail](#) for Windows 10

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From: **alexandra gross** <[alexagross@hotmail.com](mailto:alexagross@hotmail.com)>  
Date: Sat, Aug 20, 2016 at 1:36 AM  
Subject: Sunkist plan  
To: "[sarah.molina-pearson@lacity.org](mailto:sarah.molina-pearson@lacity.org)" <[sarah.molina-pearson@lacity.org](mailto:sarah.molina-pearson@lacity.org)>

M ore People, More Cars? Enough? Can we not try to maintain the quality of life for the people already here. Can we not sale down.....less people, less cars? There are already enough accidents at Hazeltine and moorpark, and also heavy traffic for the mall. Honestly, cannot people learn to make less money and think about the environs? Awful! Enough is enough!

Sent from [Mail](#) for Windows 10



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From: **Richard Guy** <[richardgguy@gmail.com](mailto:richardgguy@gmail.com)>  
Date: Mon, Sep 12, 2016 at 3:54 PM  
Subject: Comment on ICON Sherman Oaks Draft EIR  
To: Sarah Molina-Pearson <[sarah.molina-pearson@lacity.org](mailto:sarah.molina-pearson@lacity.org)>

Dear Ms. Molina-Pearson,

Attached is a six-page comment on the ICON DEIR.

A second email will attempt to include a nearly 45MB appendix to the comment; I fear that the size may cause some email infrastructure to choke and fail to deliver the appendix, so if that occurs I will deposit the appendix on a [dropbox.com](https://www.dropbox.com) website and send you a link.

Should that last step be necessary, I apologize for the additional step I'm requesting of you; you are clearly about to have an increased workload!

Sincerely,  
richard

Richard Guy  
Sherman Oaks

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From: **Richard Guy** <[richardgguy@gmail.com](mailto:richardgguy@gmail.com)>  
Date: Mon, Sep 12, 2016 at 4:30 PM  
Subject: Re: Comment on ICON Sherman Oaks Draft EIR  
To: Sarah Molina-Pearson <[sarah.molina-pearson@lacity.org](mailto:sarah.molina-pearson@lacity.org)>

As I feared, various mailers I tried all reject the too-large 24-page appendix; here's the dropbox link instead:

<https://www.dropbox.com/s/2uvzir7dkvhnwsa/ICON%20Sherman%20Oaks%20traffic%20review%20appendix.pdf?dl=0>

If this fails to work, please let me know, and I can break the appendix into 10MB (or smaller) pieces, and email them one by one.

richard

ICON Sherman Oaks  
Review of the DEIR Appendix G: LADOT Assessment and Analysis  
September 12, 2016  
Richard Guy, Ph.D.

**Summary**

The Planning Commission must reject the Traffic Analysis section of the July, 2016, DEIR as fundamentally flawed by defective data collection design and erroneous analysis: measurements of existing peak traffic levels were taken at the wrong times and in the wrong season, and projected traffic level impacts from the proposed development rely on improper methodology and incorrect reasoning.

Taken separately—and especially together—each of these flaws render meaningless the conclusions reached by LADOT.

However, correct data collection and analysis are feasible to conduct, and the material below includes suggestions on how these could have been, should have been, and can be accomplished in a satisfactory manner for this project.

**Introduction**

The traffic analysis portion of the EIR is intended to assess the potential impact of the project on existing traffic conditions.

Such analysis is commonly done by measuring actual traffic conditions and adding in expected additional traffic loads from the project and other known expected impacts from additional development and roadway projects. Special attention is paid to recurring “peak” traffic loads, as it is typically such high volume-to-capacity times that are the most troubling to effective transport in the community. The validity of the final analysis, of course, relies on the correctness, appropriateness, and completeness of the measurements; it also depends heavily on the accuracy of the projections about future traffic conditions generally, and the forecast of expected traffic contributions of the project itself.

In both of these portions (measurement and projections), LADOT traffic engineers declared their reliance upon the ITE's Trip Generation Manual, 9th edition, 2012. This is a “bible” used by virtually all traffic engineers in the US and Canada; its essential content is an encyclopedic collection of several thousand graphs that summarize actual measured traffic associated with hundreds of different types of structures and uses, in many different locales across the US and Canada. The base measurements, however, were done over a period of 50 years, by thousands of different people in communities large and small, rural and suburban and urban, using a wide range of methodologies and measurement variables. Because of this range, the Manual cautions repeatedly that the data summaries may not match local conditions, and care must be exercised in using the graphs to extrapolate projected impacts of a given project. In some cases, the data is so limited or divergent that no suggested projection formula is provided—an otherwise routine content of every

graph in the manual, to make it easier for a traffic engineer to calculate projected impact.

### **Peak traffic measurement**

A critical foundation of the Manual is the assumption that weekday traffic peaks exist, in the morning and afternoon. However, the timeframe of these peaks can and does vary in different locales, as does the existence of a mid-day peak and late-evening peak. Correct usage of the Manual—and its “peak analysis” approach—requires local validation that the measurements span a sufficient timeframe to determine where such peaks occur, and of course, the magnitude of the peaks. LADOT appears to have adopted a two-peak local standard, with timeframes of 7-10am and 3-6pm—as reflected in the detailed data reported by consultant Overland. (See physical pages 146 to 344 of DEIR 2016/07 Appendix G-2; Overland’s Appendix E, pages unnumbered.)

In this regard, the DEIR is deficient: almost every page of traffic intersection data measurements reflects a maximum or near-maximum value at an edge of the data collection timeframe, which on its face invalidates the conclusion that a peak has been identified at all, and what the magnitude of that peak might be. Further, subjective local community experience suggests that a mid-day and late evening peak also exist, but for which no measurements were made. In short, **the measurements performed by the consultant are inadequate to support any conclusions at all about existing peak traffic volume for the day in question** (Wednesday, January 14, 2015; Overland, p.26).

A closely related issue is LADOT’s reliance upon a single “representative” day of on-site traffic measurement. While Overland was careful to avoid holidays and bad weather days, both LADOT and Overland failed to consider two impacts from the large shopping mall (Sherman Oaks Fashion Square) adjacent to the project: weekend traffic, and winter holiday shopping. Subjective local community experience is that Saturday traffic is often significant throughout the year, and that the period between Thanksgiving and Christmas is exceptionally heavy. The latter impact was specifically mentioned in public comment provided during the July, 2014 comment period on the preliminary EIR, to the Planning Commission... and apparently rejected as unwarranted. This is a fundamental error, as the impact can extend daily for up to 10% of the year—a significant and sufficient time period to justify consideration of the impact of new development. The failure to measure peak-season traffic—whether in addition to off-season traffic, or instead of—likely means **the measurements mischaracterize current peak traffic conditions**.

Some might object that “one month per year” is an inappropriately small percentage of the year to consider. Note, though, that the “peak hour” studies all focus on just 1/12 of a day (two hours of twenty-four), the same fraction of one month per twelve-month year.

### **Future traffic from project**

Existing traffic measurements form a baseline upon which forecasts about traffic generated from the particular project itself are added. The resulting traffic loads are then analyzed to determine if significant changes in traffic volume versus capacity are anticipated—in which, various forms of traffic mitigation may be proposed by LADOT as a requirement for the project to proceed. These steps are largely driven by well-established procedures—and a degree of professional judgment—but they all rely on proper usage of the forecasting tools chosen by the engineer. Here we focus solely on the part of the procedures that is often considered to require the least exercise of judgment—using the ITE Trip Generation Manual graphs—but in fact can required the greatest amount of judgment.

LADOT's engineering staff appears to have reasonably extracted from the project description three distinct uses: apartment living, grocery store, and restaurant. The Manual contains summary graphs for variants of each of these; LADOT has reasonably identified a specific variant of each (200 Apartment; 850 Supermarket; 932 High-Turnover Restaurant). Each category has a metric such as number of units or square footage that is used as a comparison basis, and to aid calculations. (See DEIR App-G Interoffice Memo to Kevin Jones, p.2, for a typical table; the leftmost three columns list the above items.)

Many places in the Manual caution that care must be taken when using the data: for example, see pages 11-19 in the Appendix at the end of this review, and especially the two sections on page 12 entitled "Variations in the Statistics" and "Limitations of the Data Plots".

Note that this is not just a "your mileage may vary" level issue, but a warning that it is all too easy to mistake "apples for oranges." The engineer carries the burden of ensuring that the traffic generation studies underlying the summary graphs are an appropriate foundation upon which to draw conclusions. Failure to do so can and does lead to erroneous analysis; such a set of failures has clearly occurred here and the result is meaningless conclusions.

The following sections detail these failures.

## **220 Apartment**

The summary page for this section notes a major caveat: the number of units in an apartment project is not nearly as accurate a metric for trip generations as number of bedrooms, and that new studies should include this as part of their data collection. Nevertheless, all data presented in this Manual section considers only the number of units. (See ITE Manual page 332 reproduced in our attached Appendix.)

The summary cautions that a wide variation in unit size, price range, location and age—all of which can impact the applicability of the data. Unfortunately, such variation is not reflected in the data plots and derived formulas; it is left to the user to assess relevance... but short of consulting each source study individually, this an impossible task.

The summary also notes that the raw data came from 88 studies in 33 reports, ranging in age from the 1960s to the 2000s, from the USA and Canada. But only two of these are as recent as 2000, and made in towns in Massachusetts and Oregon. The 1990s studies are from Tennessee, Utah, Florida and South Dakota. The most recent study from California (San Diego) is 1972. [The studies are referenced on Manual p. 332; we consulted the Manual's list of references to determine the age and locale of each source study, but do not reproduce those dozens of pages here.]

The expected number of daily trips (column #4 on Jones, p.2) for a 298 unit apartment (1,982) is clearly taken directly from the formula provided (ITE Manual, p. 333). Unfortunately, a closer look at the actual data samples plotted on the graph, shows that for apartment projects in the 200-500 unit range, the formula underestimates the measured trip counts, in some cases by 30%; and understates all four of the 300-unit size projects included in the overall sample. (See our appendix.)

The more detailed (and thus, based on fewer studies) graphs of "Peak AM data" and "Peak PM data" only exacerbate the problem. One comparable 320-unit sample shows an AM peak of 300 trips, yet the formula yields 152 total trips. Even worse, the In/Out trips are not raw data, but based on proportion averages drawn from all studies, and reverse-calculated from the total trip value produced by applying the (questionable) formula. A similar situation exists with the PM traffic analysis. (See Manual pages 334-337 in our Appendix.)

So, for the forecast of traffic generated from the apartments, the LADOT analysis relies on studies that are old, largely based in towns across the country and not from the Los Angeles suburban area (except for 1960s-era data), and ignores the assumptions that resulted in a formula whose use by LADOT is questionable at best.

### **850 Supermarket**

The summary page for this section contains a bold-face warning about usage (p. 1643), noting that hours of operation may considerably influence results. The data are drawn from about two dozen reports reflecting an unknown number of markets studied mostly in the 1980s and 1990s. The most recent are from mid-size towns in Oregon, New York, New Jersey and Pennsylvania in the 2002-2008 years. None of the data is from California, much less Los Angeles; their applicability to 2018 Sherman Oaks is dubious—but the main argument we make here is data-based.

The weekday daily summary graph (ITE Manual, p. 1645) includes this bold-face warning: "**Caution – Use Carefully – Small Sample Size**". Despite this warning—and only four samples, ranging from 25,000 to 55,000 square feet—LADOT used the "Average Rate" provided. The statistical parameters included with the graph further indicate that one should have very low confidence in using any of the formulas provided.

The “AM Peak” data is even less reliable: the Manual deliberately avoids providing a formula, because the data is so inconsistent. As before, LADOT blindly used an “average rate” value, when a sample value of three times that amount for an “identical” market is present. (See Manual p. 1646)

For the “PM Peak”, LADOT’s “total traffic” value of 303 is taken from a graph with the same degree of low confidence as the daily traffic volume. For similar-sized stores, 2/3 of the values are higher than the average, and ½ are clustered near 500 trips at the peak hour. (See Manual p. 1647)

The resulting values chosen for the LADOT analysis are highly questionable, and in the DEIR these values should have come with a strong disclaimer about their reliability. This is a professional obligation carried by LADOT engineers to fully inform less-expert decision makers, that was not met in this case.

### **932 High-Turnover Sit-Down Restaurant**

The summary page for this section (ITE Manual, p. 1883-84) indicates that the graphs and formulas are based on perhaps 100 studies in 30 reports, ranging back 50 years. Post-2000 data is from Vermont, New Hampshire, New Jersey, Pennsylvania, New York, and Florida. None of the studies are from California, much less Los Angeles or Sherman Oaks. It also contains a bold-faced warning about the accuracy of AM peak traffic data. (ITE, p. 1883)

The LADOT study for this portion of the project suffers from nearly identical defects as the Supermarket portion: the graphs intentionally lack formulas for calculating estimates due to the high variability inherent in the data; it is therefore inappropriate to base estimates on this data, without a strong caveat that the resulting values are highly unreliable. This problem exists for the weekday average, the AM Peak traffic, and the PM Peak traffic: it is a fundamental misuse of statistics to use an average value in the context of high variability. (See ITE Manual pp. 1886-89.)

### **Future Traffic Estimates summary**

All three of the future usage-specific traffic estimates are fundamentally defective: they are based on data that the Manual itself identifies as unreliable and difficult to use. These caveats were apparently ignored, and certainly not conveyed in the DEIR as is normally required by professional standards.

### **Future Traffic from Other Planned Projects**

The study appropriately considered other developments “in the pipeline” to LADOT’s knowledge. This included proposals submitted (and withdrawn?) by the adjacent Westfield Fashion Square, but failed to include the 141-unit Chase Knolls development nearing ground-breaking at the corner of Riverside and Fulton—exactly one mile east of the proposed ICON project, despite LADOT consideration of projects along Ventura Boulevard much further away. This oversight is perhaps due

to the 15-year odyssey of the project post-approval of an earlier version in the early 2000s, but clearly should be included in a reworked future traffic analysis.

### **Traffic Analysis Review Conclusion**

The Planning Commission must reject the Traffic Analysis section of the July, 2016, DEIR as fundamentally flawed by defective data collection design and erroneous analysis: measurements of existing peak traffic levels were taken at the wrong times and in the wrong season, and projected traffic level impacts from the proposed development rely on improper methodology and incorrect reasoning. It further suffers to a lesser extent from future impacts of the overlooked Chase Knolls project.

Taken separately—and especially together—each of these flaws render meaningless the conclusions reached by LADOT.

### **Remedies**

The defects in the DEIR Traffic Analysis are readily overcome by measurements taken with greater care. Taking current traffic measurements from 6am to 11pm (an hour before the current “standard” start time, and an hour after the Sherman Oaks Fashion Square closes in peak season), during an appropriate day in mid-December, 2016, should resolve the “wrong times” and “wrong season” defects.

Inclusion of a suitable Chas Knolls analysis is straightforward—subject to appropriate use of the ITE Trip Generation Manual data.

The ITE Trip Generation Manual issues are not easily resolved: a correct usage of the statistical tools in the Manual would likely result in a range of values presented to the Planning Commission, which simply “passes the buck” to a non-expert panel. This would be better than confidently asserting that nonsense has meaning, and sound decisions can be based on same, but remains unsatisfactory.

The better alternative here would be to measure actual apartment, grocery, and restaurant traffic in a similar economic, geographic, and demographic setting, at the present time, in suburban Los Angeles. Similar venues exist along the Ventura Boulevard corridor between North Hollywood and Woodland Hills, and on the West Side—settings that reflect the unique Los Angeles environment, rather than outdated ones from distant parts of the country.



## 4 | Description of the Database

The data analyzed in this document were contributed on a voluntary basis by various state and local governmental agencies; consulting firms; individual transportation professionals; universities and colleges; developers; associations; and local sections, districts and student chapters of ITE. In many cases, the data were originally contained in published reports or unpublished analyses conducted by such groups. The sources of these reports or analyses are listed in Appendix A. The source numbers for studies contained in each land use are listed on the land use description pages in Volumes 2 and 3.

ITE Headquarters conducted no original field surveys. The amount of data submitted for an individual site varied from as little as one peak-hour volume to 7 days of directional hourly volumes. All data have been combined to maximize the size of the database for each land use and each time period. Data received were initially examined by ITE staff for validity and reasonableness before being entered into the comprehensive database.

### Data Collection

Some of the data submitted were collected using automatic counters configured to count vehicular traffic entering and exiting a site. The sites selected for counting did not include through traffic, and counts were taken on driveways of sufficient length to avoid the double counting of turning vehicles. In some cases, counts were non-directional and therefore did not distinguish between entering and exiting vehicles. Manual counts often supplemented the automatic counts to obtain vehicle occupancy and classification; to check the reliability of the automatic counters; and to obtain directional counts during peak periods when a non-directional automatic count was being conducted. In other cases, only manual counts were conducted during peak periods. *All data presented in this manual represent **VEHICLE** trip generation rather than person trip generation.*

Additional information regarding site characteristics was obtained through personal interviews, actual measurements, telephone conversations, or mail-back questionnaires.

### Data Analysis and Storage

The statistical analyses conducted for the ninth edition of *Trip Generation* were derived from a customized statistical software program and from a trip generation database located at ITE Headquarters. Each data record was referenced in the database by a source number; the month and year of the traffic volume measurement; the metropolitan area (when known); and a three-digit land use code. Data for 172 land uses are classified within 10 major land use categories. Additional land uses are continuously added to the database as data become available.

### Data Age

The database compiled to produce this manual contains data extending back to the early 1960s. Consequently, there was concern that the data collected before the first major energy crisis in 1973

may differ from the post-energy crisis data. The Federal Highway Administration (FHWA) analyzed the database from the third edition (1982) of *Trip Generation* and stated, "Based on statistical tests such as T-tests and F-ratios, it was concluded that there were no significant differences between the mean trip rates of older data (pre-1973) and new data (post-1973) for all land uses analyzed."<sup>5</sup> ITE staff performed additional analyses comparing pre- and post-1980 data for the restaurant land uses (931, 932, 933) for the *February 1995 Update to the Fifth Edition*. Again it was found that there were no significant differences between the mean trip rates of the older data and the newer data and that all data points were retained in the database to maximize the sample sizes of the given land uses. Prior to the release of the eighth edition of *Trip Generation*, ITE examined the data that were contained in the banking land use—Drive-in Bank (912)—to determine if changes in travel patterns resulting from recent technological advances in the banking industry had a significant impact on the trip generation rates. This analysis concluded that pre- and post-2000 trip generation data were significantly different. As a result, all data from the years prior to the year 2000 were removed from the database for the two banking land uses—Walk-in Bank (911) and Drive-in Bank (912). It is anticipated that additional analyses will be performed for future updates to continue monitoring variations based on the age of the data.

### Variations in the Statistics

Variations in trip generation characteristics for specific land uses are reflected in the range of rates, standard deviation and coefficient of determination ( $R^2$ ) value. (See Chapter 5, "Description of Data Plots and Reported Statistics," for additional details on these topics.) These variations may be due to a small sample size, individual marketing of the site, economic conditions of the business market, geographic location of the sites studied, or unique characteristics of the specific site. Accordingly, judgment must be exercised in the use of the statistics in this manual.

Other sources of variation include different lengths of traffic count duration and the time of year the traffic volumes were counted; that is, daily and seasonal variations may exist for some land uses. Studies have not been undertaken to analyze differences based on geographic location.

### Limitations of the Data Plots

The plots presented in *Trip Generation* cover only the range of independent variables for which data are available. Caution should be used if extrapolating the data beyond the ranges provided because no information has been supplied to document trip generation characteristics beyond the given ranges.

It should also be noted that in some cases, because of the limited sample size and variation in the data received, the projected trip generation estimate for the peak hour of the adjacent street traffic exceeds the trip generation estimate for the peak hour of the generator. By definition, this is impossible. In these isolated cases, knowledge of the project site and engineering judgment should be used to select the appropriate trip generation approximation.

<sup>5</sup> Kellercio. *Development and Application of Trip Generation Rates*. Washington, DC, USA; U.S. Department of Transportation, Federal Highway Administration, 1985.

## 5 | Description of Data Plots and Reported Statistics

### Data Plots

Figure V-1 is an example of the statistical and descriptive information available for the majority of the land uses contained in Volumes 2 and 3 of *Trip Generation*, 9th Edition. This sample data page provides explanatory notes describing each element of the figure.

Data plots provide the most fundamental display of the variance within the database. It should be emphasized that the data points represented on the plots are not trip generation rates; rather, they are the observed number of trips, plotted against the size of the independent variable.

Some plots may have the statement "Caution—Use Carefully—Small Sample Size" printed above the plot areas. This statement is displayed when five or fewer studies comprise the data set.

Data plots were not provided for land uses containing only one study for an independent variable and time-of-day combination. In these cases, the data are presented in tabular form immediately following the land use description page at the beginning of each land use. A description of the equations on the data plots is contained in Chapter 6, "Instructions."

### Reported Statistics

#### Average Trip Rate

The average trip generation rates displayed in this manual were calculated on the basis of a weighted **average trip rate**. The weighted average trip rate was used rather than the average of the individual rates because of the variance found within each data set. Sites with a large variance from the mean would have over-influenced the average rate had they not been weighted.

#### Standard Deviation for the Weighted Average Trip Rate

The **standard deviation** is a measure of how widely dispersed the data points are around the calculated average. The lower the standard deviation, meaning less dispersion in the data, the better the data fit. In this document, the statistics reported are based on a "weighted average," not an "arithmetic average." Therefore, the standard deviation is an approximation and not statistically correct.

#### Regression Analysis

The customized software used in the ninth edition of *Trip Generation* examines the independent variable and the number of trips in order to generate a regression curve, a regression equation and a coefficient of determination ( $R^2$ ) for each land use. The **coefficient of determination** is defined as the percent of the variance in the number of the trips associated with the variance in the size of the independent variable. If the  $R^2$  value is 0.75, then 75 percent of the variance in the number of trips is accounted for by the variance in the size of the independent variable. As the  $R^2$  value increases



toward 1.0, the better the fit; as the  $R^2$  value decreases toward 0, the worse the fit. A standard formula for calculating  $R^2$  can be found in a statistics textbook.

The general forms of the regression equations used in this manual include:

$$T = aX + b \text{ (linear)}$$

$$\ln(T) = a\ln(X) + b \text{ (logarithmic)}$$

The objective in developing the relationship between  $X$  (the independent variable) and  $T$  (the dependent variable or number of trips) is to determine the values of the parameters  $a$  and  $b$ . As a result, the expected error in estimating the dependent variable (the number of trips) given the estimates of the independent variable will be minimized.

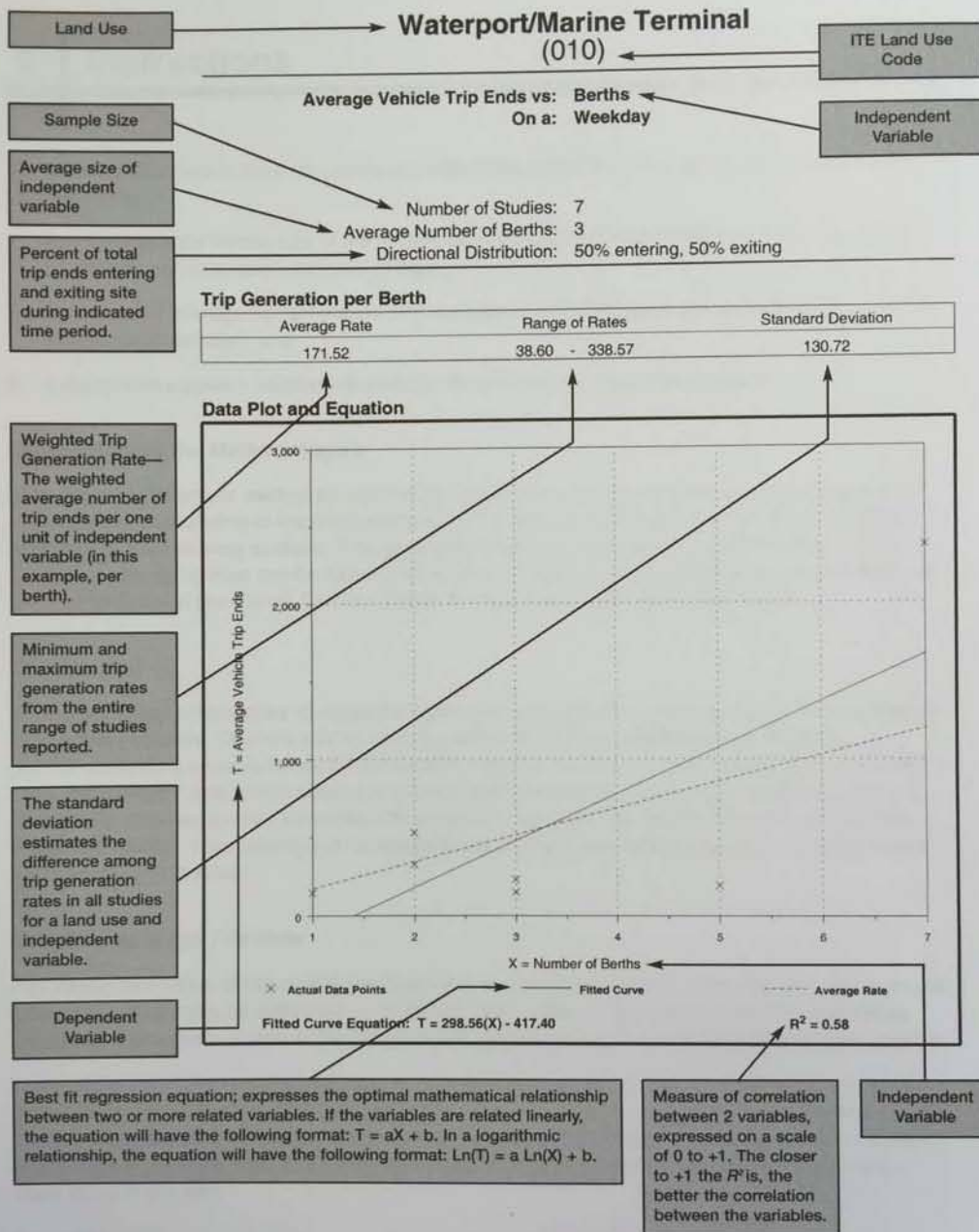
The software program selects and plots the regression equation with the highest  $R^2$  value. The regression equation appears on the graph as a solid line to show how well it represents the actual data points.

Best fit regression curves are shown in this manual only when each of the following three conditions is met:

1. The  $R^2$  is greater than or equal to 0.50.
2. The sample size is greater than or equal to 4.
3. The number of trips increases as the size of the independent variable increases.

It should be noted that there are several instances when the regression curves result in equations with significantly large y-intercepts. The use of these equations may produce illogical trip-end estimates for independent variables that are significantly less than the average-sized value. For such cases, users are cautioned in applying data and are referred to Chapter 3, "Guidelines for Estimating Trip Generation," of the *Trip Generation Handbook*, Second Edition found in the second part of this volume to estimate appropriate trip generation rates.

# Figure V-1: Sample Data Page



## 6 | Instructions

*Trip Generation* provides the user community with three methods of estimating trips at proposed developments:

1. a plot of trip ends versus size of the independent variable for each study, which can be used to graphically obtain a rough estimate of trips;
2. the weighted average trip generation rate (number of weighted trip ends per unit of the independent variable); and
3. a regression equation, relating trip ends to the size of the independent variable.

### Understanding the Methodologies

Selecting an appropriate method for estimating trips requires the use of engineering judgment and a thorough understanding of the three methodologies listed above. The methodologies are briefly explained in the following sections. A more detailed explanation of selecting the most reasonable method of estimating trips can be found in Chapter 3, "Guidelines for Estimating Trip Generation," of the *Trip Generation Handbook*, Second Edition found in the second part of this Volume.

### Graphic Plot

The most fundamental display of available information is a plot of the total trip ends versus a related independent variable. This plot can be used to predict the number of trip ends generated for a given independent variable based on the existing data points. This method is reasonably accurate if there are sufficient data points within the range of the independent variable being used to define a relationship between the two variables. Otherwise, the need for interpreting the data (for example, discarding "erratic" data points) and for interpolating between data points may result in inconsistent interpretations of the data.

### Weighted Average Trip Rate

The traditional method of forecasting trips has been to apply a weighted average trip rate. For example, the number of trips can be estimated by multiplying the number of trip ends per unit of independent variable by the number of units of the independent variable associated with the proposed development.

The standard deviation provides a measure of how widely dispersed the data points are around the calculated average; the less the dispersion (the lower the number), the better the approximation. The approximated standard deviations are provided for plots with three or more data points. Graphically, use of the weighted average rate assumes a linear relationship passing through the origin with a slope equal to the rate.



### Regression Equation

Regression analysis provides a tool for developing an equation that defines the line that "fits best" through the data points.

Use of the regression equation allows a direct forecasting of trip ends based on the independent variable of the proposed development, thus eliminating differences of opinion arising from interpolating a plot of individual data points. Unlike the weighted average rate, the plotted equation does not necessarily pass through the origin, nor does the relationship have to be linear.

The correlation coefficient ( $R$ ) is a measure of the degree of association or closeness between variables. The coefficient of determination ( $R^2$ ) is the percent of the variance in the number of trips associated with the variance in the size of the independent variable. Thus, an  $R$  value of 0.8 results in an  $R^2$  of 0.64, which is to say that 64 percent of the variance in the number of trips is accounted for by the variance in the size of the independent variable. The closer the  $R^2$  value is to 1.0, the better the relationship between the number of trips and the size of the independent variable.

### Sample Problem

The method of calculating trip generation through the use of either a regression equation or the weighted average trip generation rate is illustrated by the sample problem below.

For a waterport/marine terminal (Land Use 010) with three berths, the calculation of the average vehicle trip ends per berth on an average weekday is provided as follows. Refer to the data and plot presented for this land use in Figure V-1, "Sample Data Page," shown in Chapter 5. The rate and equation are listed accordingly:

Rate:  $T = 171.52$  trip ends per berth

Equation:  $T = 298.56(X) - 417.40$

Calculate vehicle trip ends using the rate:

$$T = 171.52 \times 3 = 515 \text{ vehicle trip ends}$$

Calculate vehicle trip ends using the equation:

$$T = 298.56(3) - 417.40 = 478 \text{ vehicle trip ends}$$

### Choice of Day and Time Period

The day and time period that should be used in determining the appropriate design requirements for the proposed development are directly related to the type of land use and the traffic characteristics on the adjacent street system. Trip generation for different days and time periods should be examined to determine when the site being planned experiences its peak traffic flow and to define the relationship between the site's peak generation and the peaking characteristics of the adjacent street system.

In most cases, the traffic volume generated by the site combined with the traffic volume already

on its adjacent street is highest during the traditional commuting peak hours. Thus, the maximum impact would be evaluated by adding the generator peak traffic volume and the adjacent street peak traffic volume.

Some land uses, however, do not peak at the same time as the adjacent streets. Therefore, combinations of site volumes and street volumes at different times should be checked to determine the proposed site's maximum impact.

More detailed information than is included in this document may be required to determine the peak time and volumes needed for the analysis.



## Land Use: 220 Apartment

### Description

Apartments are rental dwelling units located within the same building with at least three other dwelling units, for example, quadraplexes and all types of apartment buildings. The studies included in this land use did not identify whether the apartments were low-rise, mid-rise, or high-rise. Low-rise apartment (Land Use 221), high-rise apartment (Land Use 222) and mid-rise apartment (Land Use 223) are related uses.

### Additional Data

This land use included data from a wide variety of units with different sizes, price ranges, locations and ages. Consequently, there was a wide variation in trips generated within this category. Other factors, such as geographic location and type of adjacent and nearby development, may also have had an effect on the site trip generation.

The peak hour of the generator typically coincided with the peak hour of the adjacent street traffic.

The sites were surveyed between the late 1960s and the 2000s throughout the United States and Canada.

***Many of the studies included in this land use did not indicate the total number of bedrooms. To assist in the future analysis of this land use, it is important that this information be collected and included in trip generation data submissions.***

### Source Numbers

2, 4, 5, 6, 9, 10, 11, 12, 13, 14, 16, 19, 20, 34, 35, 40, 72, 91, 100, 108, 188, 192, 204, 211, 253, 283, 357, 436, 525, 530, 579, 583, 638

## Apartment (220)

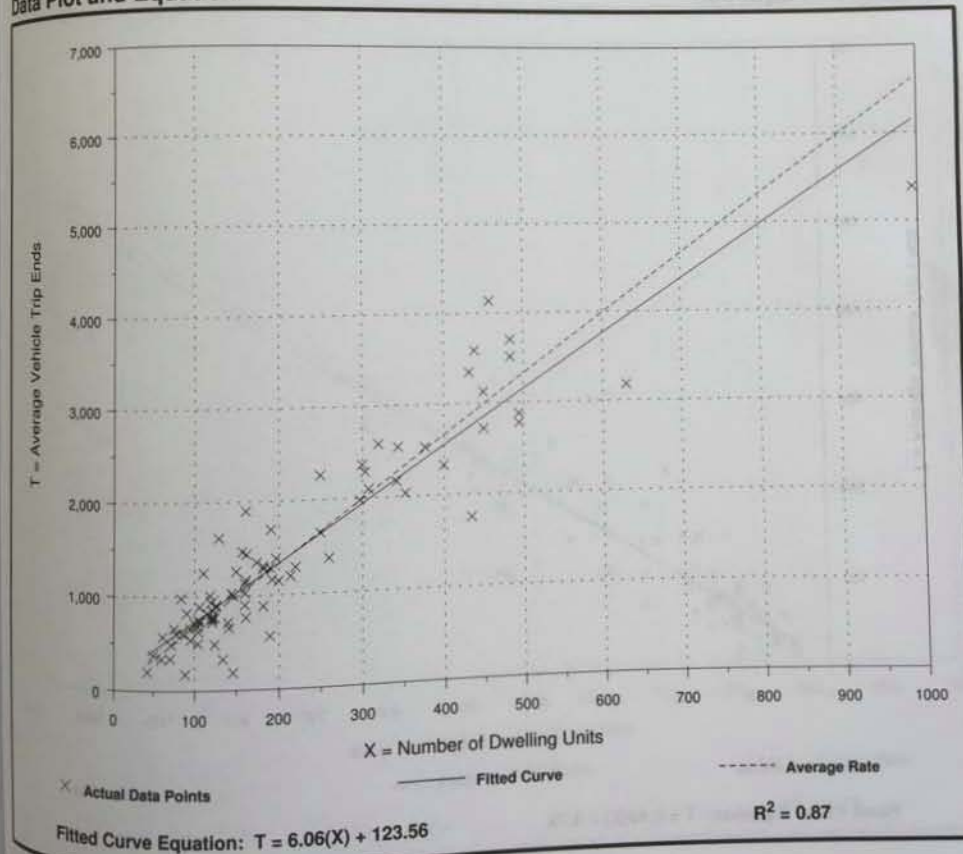
Average Vehicle Trip Ends vs: Dwelling Units  
On a: Weekday

Number of Studies: 88  
Avg. Number of Dwelling Units: 210  
Directional Distribution: 50% entering, 50% exiting

### Trip Generation per Dwelling Unit

Average Rate	Range of Rates	Standard Deviation
6.65	1.27 - 12.50	3.07

### Data Plot and Equation



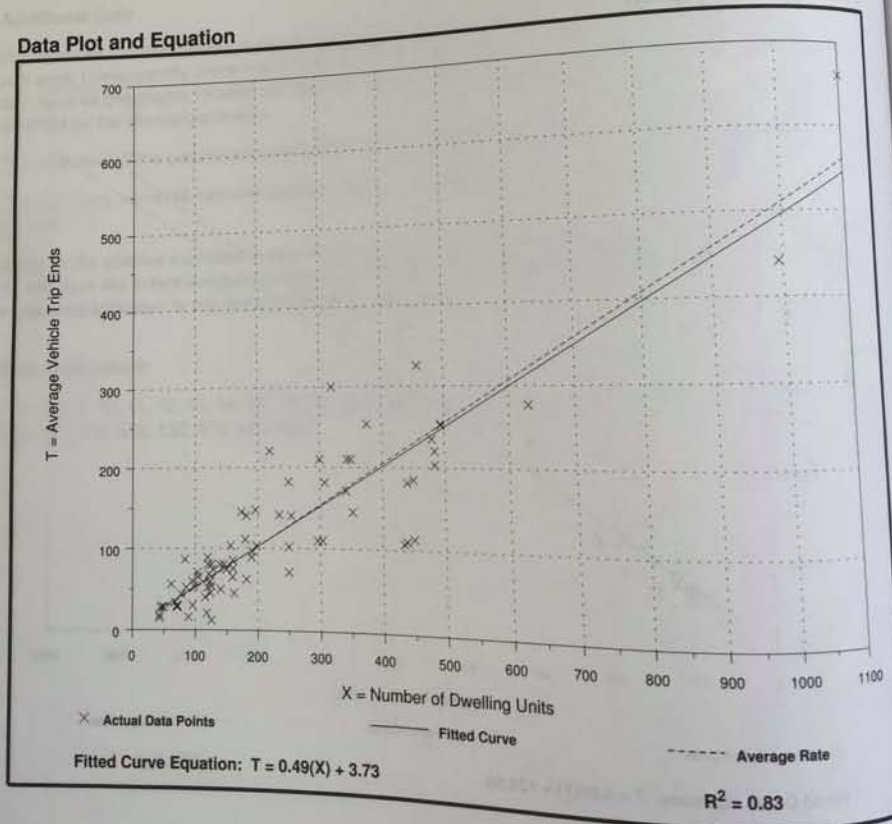
## Apartment (220)

Average Vehicle Trip Ends vs: Dwelling Units  
On a: Weekday,  
Peak Hour of Adjacent Street Traffic,  
One Hour Between 7 and 9 a.m.

Number of Studies: 78  
Avg. Number of Dwelling Units: 235  
Directional Distribution: 20% entering, 80% exiting

Trip Generation per Dwelling Unit		Standard Deviation
Average Rate	Range of Rates	0.73
0.51	0.10 - 1.02	

Data Plot and Equation



## Apartment (220)

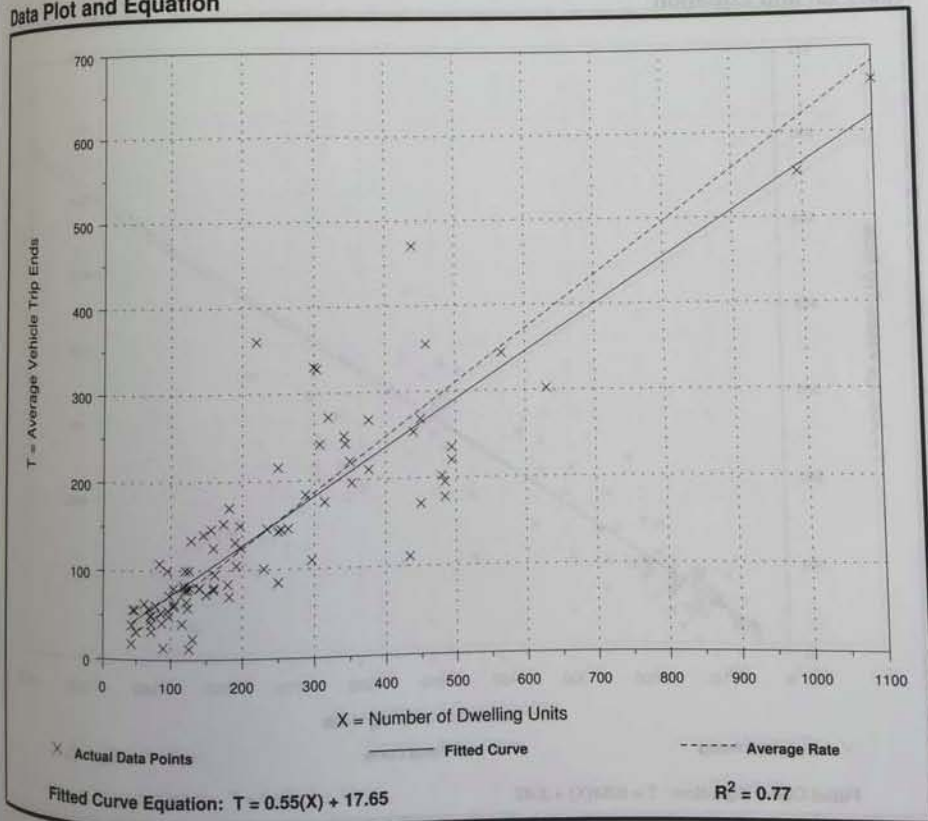
Average Vehicle Trip Ends vs: Dwelling Units  
 On a: Weekday,  
 Peak Hour of Adjacent Street Traffic,  
 One Hour Between 4 and 6 p.m.

Number of Studies: 90  
 Avg. Number of Dwelling Units: 233  
 Directional Distribution: 65% entering, 35% exiting

### Trip Generation per Dwelling Unit

Average Rate	Range of Rates	Standard Deviation
0.62	0.10 - 1.64	0.82

### Data Plot and Equation





## Apartment (220)

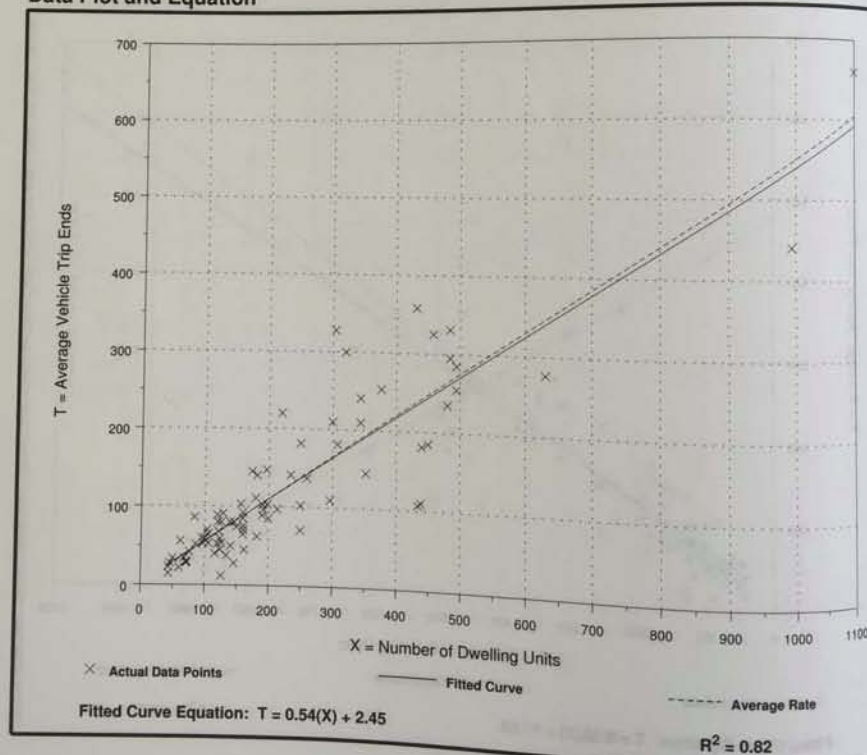
Average Vehicle Trip Ends vs: Dwelling Units  
On a: Weekday,  
A.M. Peak Hour of Generator

Number of Studies: 83  
Avg. Number of Dwelling Units: 230  
Directional Distribution: 29% entering, 71% exiting

### Trip Generation per Dwelling Unit

Average Rate	Range of Rates	Standard Deviation
0.55	0.10 - 1.08	0.76

### Data Plot and Equation



## Apartment (220)

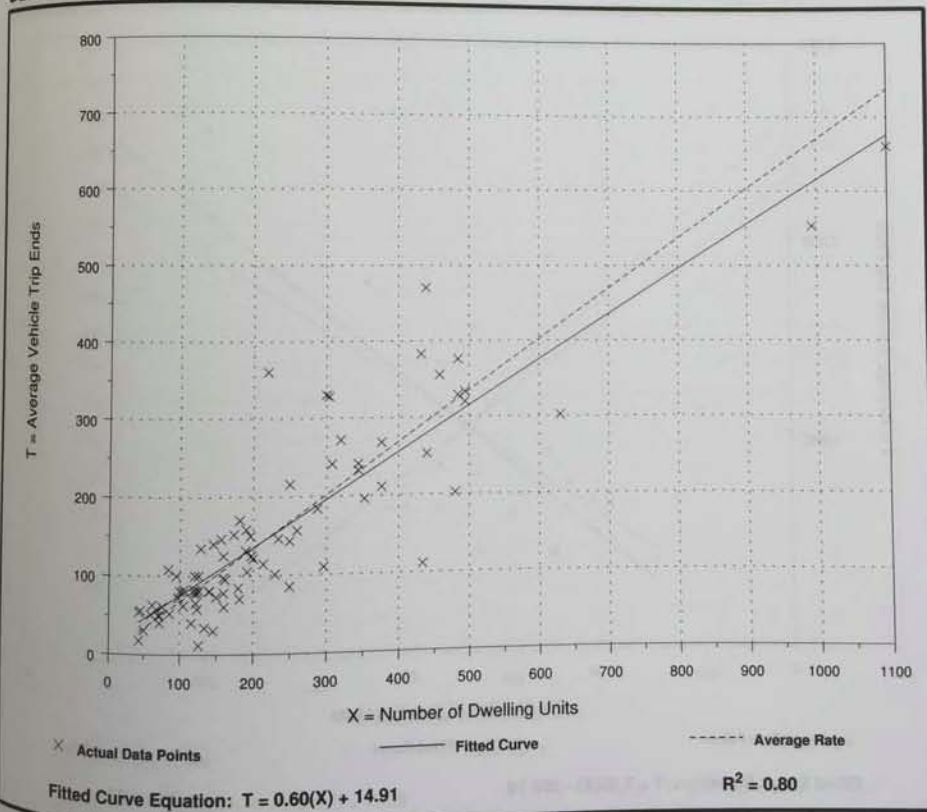
Average Vehicle Trip Ends vs: Dwelling Units  
On a: Weekday,  
P.M. Peak Hour of Generator

Number of Studies: 85  
Avg. Number of Dwelling Units: 229  
Directional Distribution: 61% entering, 39% exiting

### Trip Generation per Dwelling Unit

Average Rate	Range of Rates	Standard Deviation
0.67	0.10 - 1.64	0.85

### Data Plot and Equation



## Land Use: 850 Supermarket

### Description

Supermarkets are free-standing retail stores selling a complete assortment of food, food preparation and wrapping materials, and household cleaning items. Supermarkets may also contain the following products and services: ATMs, automobile supplies, bakeries, books and magazines, dry cleaning, floral arrangements, greeting cards, limited-service banks, photo centers, pharmacies and video rental areas. Some facilities may be open 24 hours a day. Discount supermarket (Land Use 854) is a related use.

### Additional Data

*Caution should be used when applying daily trip generation rates for supermarkets, as the database contains a mixture of facilities with varying hours of operation. Future data submissions should specify hours of operation of a site.*

### Specialized Land Use Data

One study provided data on a supermarket in Oregon that also carried clothing, footwear, bedding, furniture, jewelry, beauty products, electronics, toys, lumber and garden supplies. The secondary products offered at this supermarket varied from the other stores in this land use; therefore, the information collected for this facility is presented in the following table and was excluded from the data plots. The weekday morning and afternoon peak hours of the generator at this site were between 8:45 a.m. and 9:45 a.m. and between 4:45 p.m. and 5:45 p.m., respectively. The Saturday and Sunday peak hours of the generator were between 3:00 p.m. and 4:00 p.m. and between 12:45 p.m. and 1:45 p.m., respectively.

<u>Independent Variable</u>	<u>Trip Generation Rate</u>	<u>Size of Independent Variable</u>	<u>Number of Studies</u>	<u>Directional Distribution</u>
<b>1,000 Square Feet Gross Floor Area</b>				
Weekday A.M. Peak Hour of Generator	4.21	78	1	Not available
Weekday P.M. Peak Hour of Generator	10.13	78	1	Not available
Saturday Peak Hour of Generator	10.91	78	1	Not available
Sunday Peak Hour of Generator	9.83	78	1	Not available

Source: 746

The sites were surveyed between the 1960s and the 2000s throughout the United States.

### Source Numbers

2, 4, 5, 72, 98, 203, 213, 251, 273, 305, 359, 365, 438, 442, 447, 448, 514, 520, 552, 577, 610, 716, 746

## Supermarket (850)

Average Vehicle Trip Ends vs: 1000 Sq. Feet Gross Floor Area  
On a: Weekday

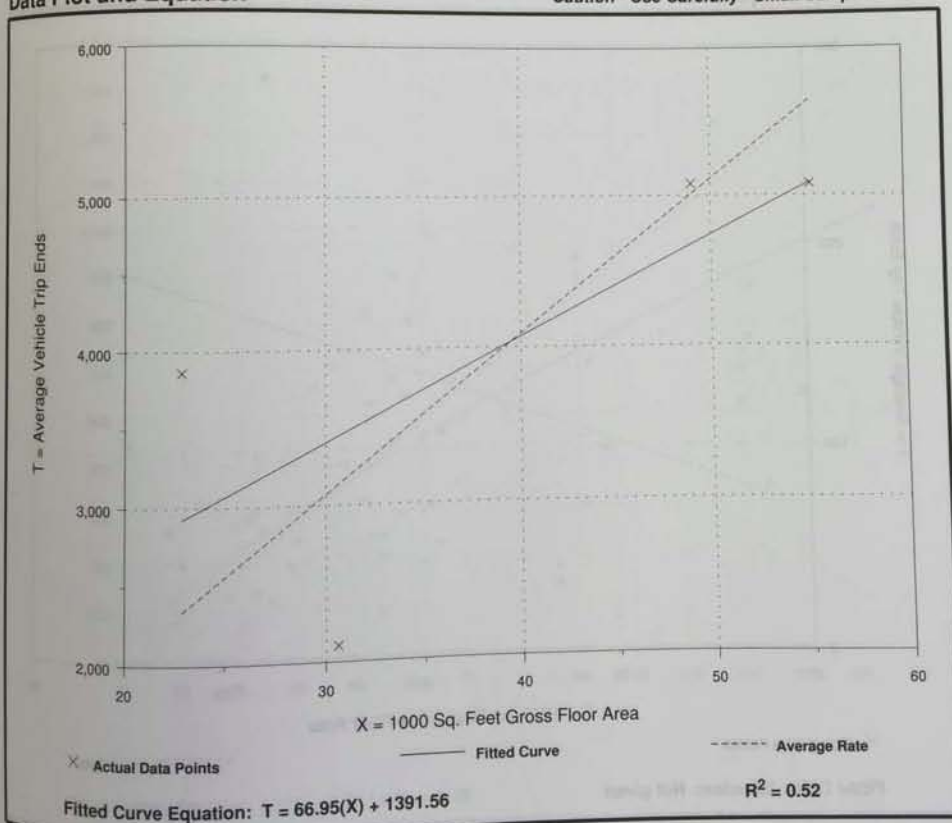
Number of Studies: 4  
Average 1000 Sq. Feet GFA: 39  
Directional Distribution: 50% entering, 50% exiting

### Trip Generation per 1000 Sq. Feet Gross Floor Area

Average Rate	Range of Rates	Standard Deviation
102.24	68.65 - 168.88	31.73

### Data Plot and Equation

Caution - Use Carefully - Small Sample Size





## Supermarket (850)

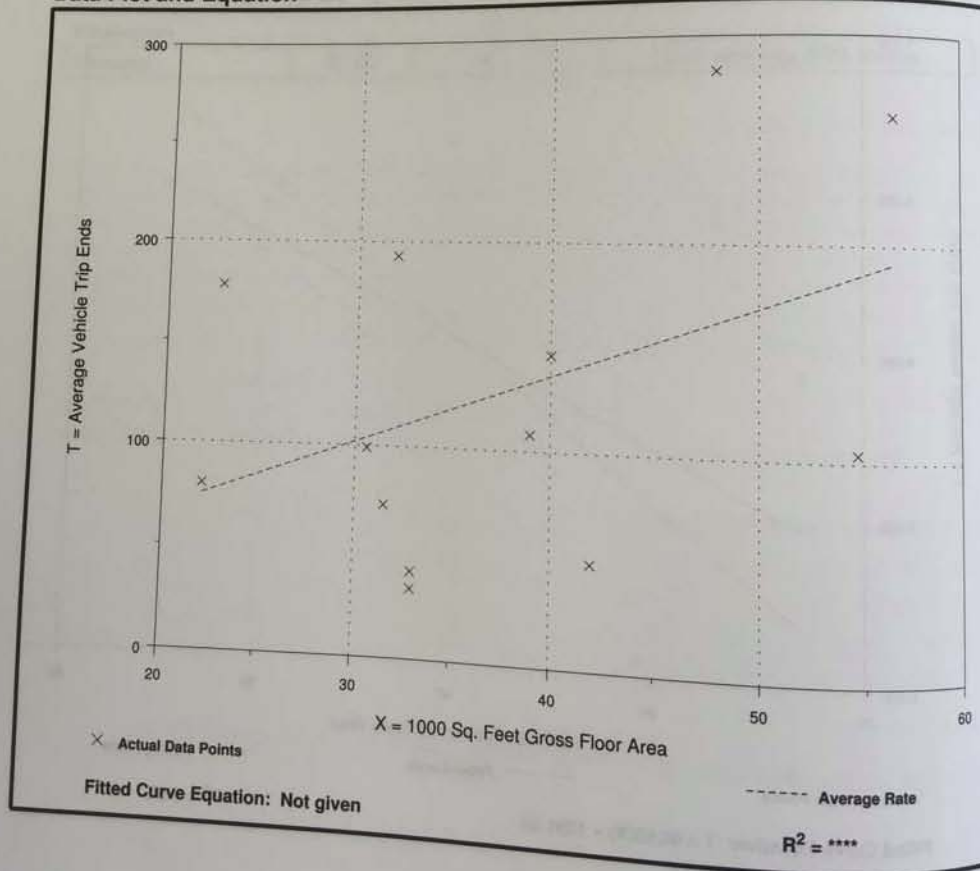
Average Vehicle Trip Ends vs: 1000 Sq. Feet Gross Floor Area  
On a: Weekday,  
Peak Hour of Adjacent Street Traffic,  
One Hour Between 7 and 9 a.m.

Number of Studies: 13  
Average 1000 Sq. Feet GFA: 37  
Directional Distribution: 62% entering, 38% exiting

### Trip Generation per 1000 Sq. Feet Gross Floor Area

Average Rate	Range of Rates	Standard Deviation
3.40	1.00 - 7.78	2.64

### Data Plot and Equation



## Supermarket (850)

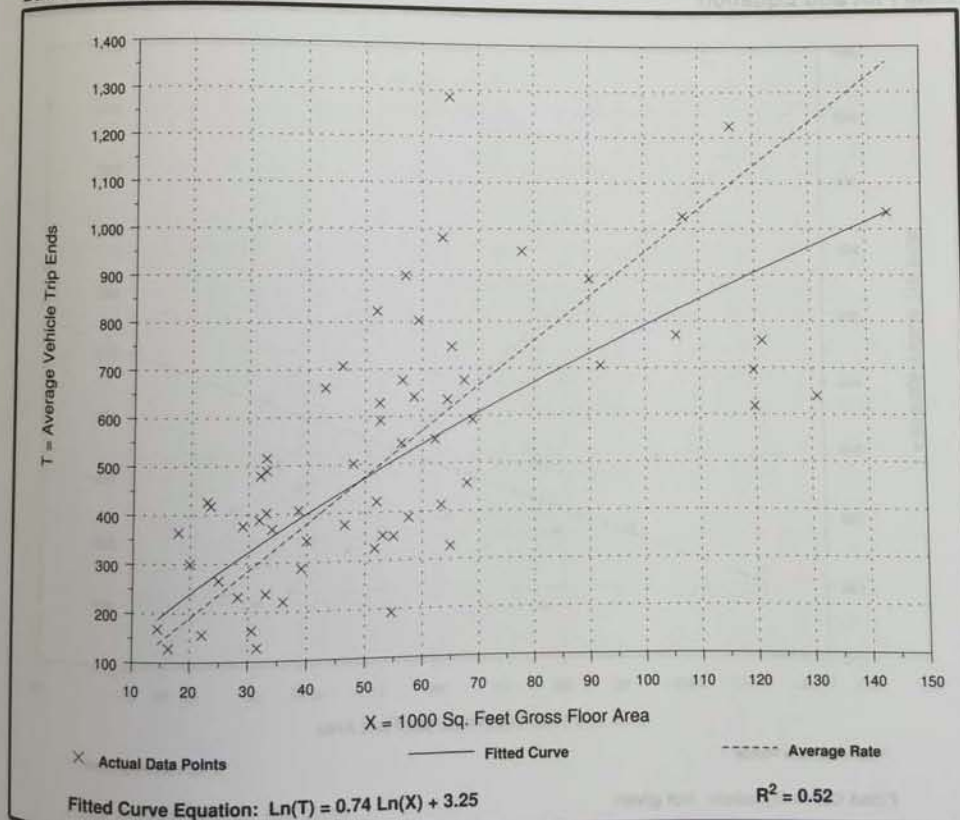
Average Vehicle Trip Ends vs: 1000 Sq. Feet Gross Floor Area  
On a: Weekday,  
Peak Hour of Adjacent Street Traffic,  
One Hour Between 4 and 6 p.m.

Number of Studies: 62  
Average 1000 Sq. Feet GFA: 56  
Directional Distribution: 51% entering, 49% exiting

### Trip Generation per 1000 Sq. Feet Gross Floor Area

Average Rate	Range of Rates	Standard Deviation
9.48	3.53 - 20.29	4.81

### Data Plot and Equation



## Land Use: 932 High-Turnover (Sit-Down) Restaurant

### Description

This land use consists of sit-down, full-service eating establishments with typical duration of stay of approximately one hour. This type of restaurant is usually moderately priced and frequently belongs to a restaurant chain. Generally, these restaurants serve lunch and dinner; they may also be open for breakfast and are sometimes open 24 hours per day. These restaurants typically do not take reservations. Patrons commonly wait to be seated, are served by a waiter/waitress, order from menus and pay for their meal after they eat. Some facilities contained within this land use may also contain a bar area for serving food and alcoholic drinks. Quality restaurant (Land Use 931), fast-food restaurant without drive-through window (Land Use 933), fast-food restaurant with drive-through window (Land Use 934) and fast-food restaurant with drive-through window and no indoor seating (Land Use 935) are related uses.

### Additional Data

***Users should exercise caution when applying statistics during the A.M. peak periods, as the sites contained in the database for this land use may or may not be open for breakfast. In cases where it was confirmed that the sites were not open for breakfast, data for the A.M. peak hour of the adjacent street traffic were removed from the database.***

Information on approximate hourly variation in high-turnover (sit-down) restaurant traffic is shown in the following table. It should be noted, however, that the information contained in this table is based on a limited sample size. Therefore, caution should be exercised when applying the data. Also, some information provided in the table may conflict with the results obtained by applying the average rate or regression equations. When this occurs, it is suggested that the results from the average rate or regression equations be used, as they are based on a larger number of studies.

Hourly Variation in High-Turnover (Sit-Down) Restaurant Traffic						
Time	Average Weekday <sup>a</sup>		Average Saturday <sup>b</sup>		Average Sunday <sup>c</sup>	
	Percent of 24-Hour Entering Traffic	Percent of 24-Hour Exiting Traffic	Percent of 24-Hour Entering Traffic	Percent of 24-Hour Exiting Traffic	Percent of 24-Hour Entering Traffic	Percent of 24-Hour Exiting Traffic
6 a.m.–7 a.m.	1.5	0.8	0.9	0.6	0.1	0.4
7 a.m.–8 a.m.	3.0	1.7	2.2	1.0	0.9	1.3
8 a.m.–9 a.m.	3.6	2.3	4.1	2.8	1.7	0.1
9 a.m.–10 a.m.	4.1	2.7	4.1	3.5	1.4	1.2
10 a.m.–11 a.m.	3.3	3.2	4.6	3.7	2.3	4.2
11 a.m.–12 p.m.	7.4	3.8	4.6	4.0	5.5	2.6
12 p.m.–1 p.m.	8.6	6.6	5.1	3.6	8.8	3.9
1 p.m.–2 p.m.	4.8	8.6	4.4	4.3	6.6	8.2
2 p.m.–3 p.m.	3.2	5.5	3.8	4.3	5.9	5.1
3 p.m.–4 p.m.	3.0	4.0	3.6	3.5	8.7	7.2
4 p.m.–5 p.m.	5.6	4.5	4.5	4.0	10.0	8.4
5 p.m.–6 p.m.	9.7	4.6	7.1	4.3	12.4	10.5
6 p.m.–7 p.m.	10.7	7.9	9.9	6.7	11.3	10.0
7 p.m.–8 p.m.	9.5	9.0	8.5	7.3	8.7	9.3
8 p.m.–9 p.m.	7.7	9.0	8.1	8.5	5.9	8.0
9 p.m.–10 p.m.	4.9	8.6	6.5	7.3	4.2	7.5
10 p.m.–6 a.m.	9.4	17.2	18.0	30.6	5.6	12.1

Sites ranged in size from 4,500 to 21,000 square feet gross floor area

<sup>a</sup> Source numbers – 13, 88, 126, 507 and The Traffic Group, Inc.; based on seven studies

<sup>b</sup> Source numbers – 13, 88, 126 and The Traffic Group, Inc.; based on five studies

<sup>c</sup> Source numbers – 13, 88 and 126; based on three studies

Vehicle occupancy ranged from 1.39 to 1.69 persons per automobile on an average weekday. The average for the sites surveyed was approximately 1.52.

Five sites submitted for inclusion in this land use indicated the presence of an on-site pick-up window. From the limited data sample, it does not appear that the presence of a pick-up window had a significant impact on trip generation.

The outdoor seating area is not included in the overall gross floor area. Therefore, the number of seats may be a more reliable independent variable on which to establish trip generation rates for facilities having significant outdoor seating.

The sites were surveyed between the 1960s and the 2000s throughout the United States.

#### Source Numbers

2, 4, 5, 72, 90, 100, 126, 269, 275, 280, 300, 301, 305, 338, 340, 341, 358, 384, 424, 432, 437, 438, 444, 507, 555, 577, 589, 617, 618, 728



## High-Turnover (Sit-Down) Restaurant (932)

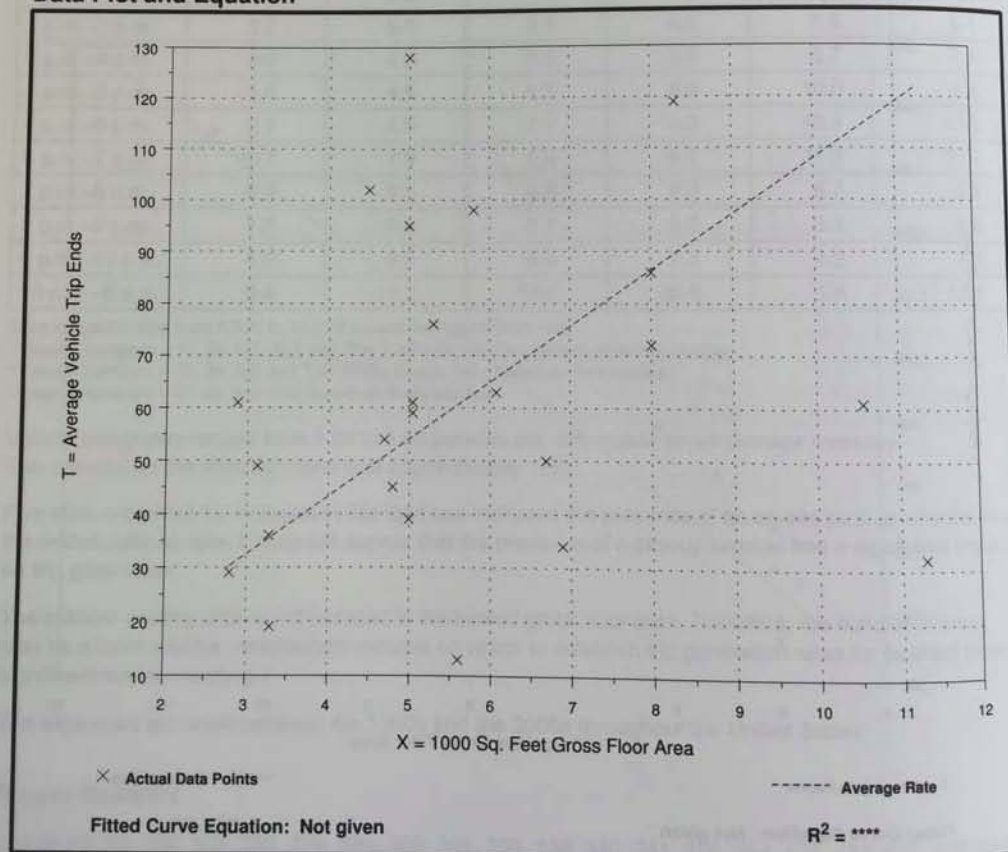
Average Vehicle Trip Ends vs: 1000 Sq. Feet Gross Floor Area  
On a: Weekday,  
Peak Hour of Adjacent Street Traffic,  
One Hour Between 7 and 9 a.m.

Number of Studies: 24  
Average 1000 Sq. Feet GFA: 6  
Directional Distribution: 55% entering, 45% exiting

### Trip Generation per 1000 Sq. Feet Gross Floor Area

Average Rate	Range of Rates	Standard Deviation
10.81	2.32 - 25.60	6.59

### Data Plot and Equation



## High-Turnover (Sit-Down) Restaurant (932)

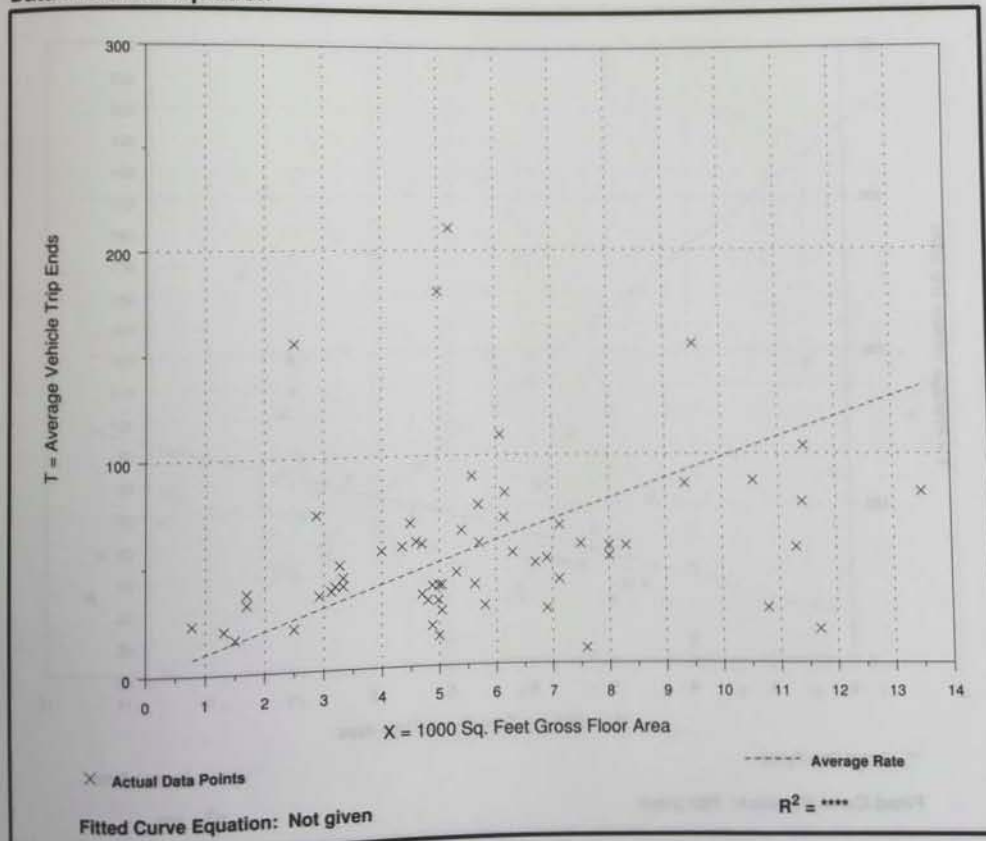
Average Vehicle Trip Ends vs: 1000 Sq. Feet Gross Floor Area  
On a: Weekday,  
Peak Hour of Adjacent Street Traffic,  
One Hour Between 4 and 6 p.m.

Number of Studies: 60  
Average 1000 Sq. Feet GFA: 6  
Directional Distribution: 60% entering, 40% exiting

### Trip Generation per 1000 Sq. Feet Gross Floor Area

Average Rate	Range of Rates	Standard Deviation
9.85	0.92 - 62.00	8.54

### Data Plot and Equation



## High-Turnover (Sit-Down) Restaurant (932)

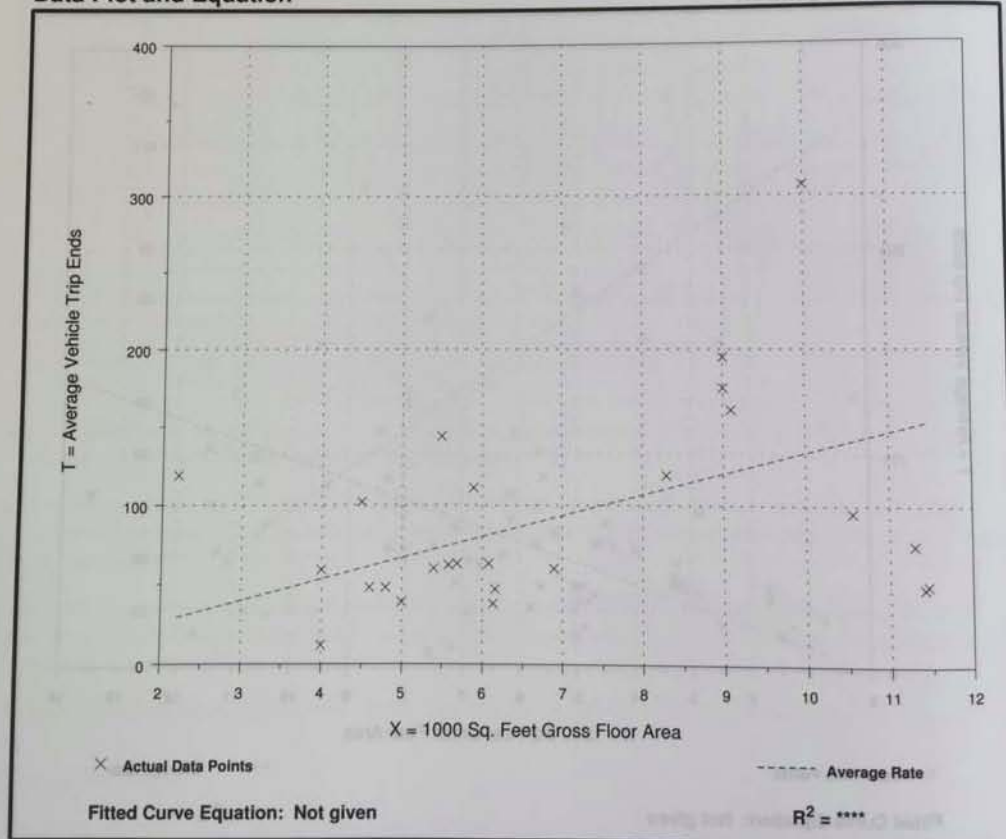
Average Vehicle Trip Ends vs: 1000 Sq. Feet Gross Floor Area  
On a: Weekday,  
A.M. Peak Hour of Generator

Number of Studies: 25  
Average 1000 Sq. Feet GFA: 7  
Directional Distribution: 53% entering, 47% exiting

### Trip Generation per 1000 Sq. Feet Gross Floor Area

Average Rate	Range of Rates	Standard Deviation
13.33	3.00 - 54.09	9.44

### Data Plot and Equation



# High-Turnover (Sit-Down) Restaurant (932)

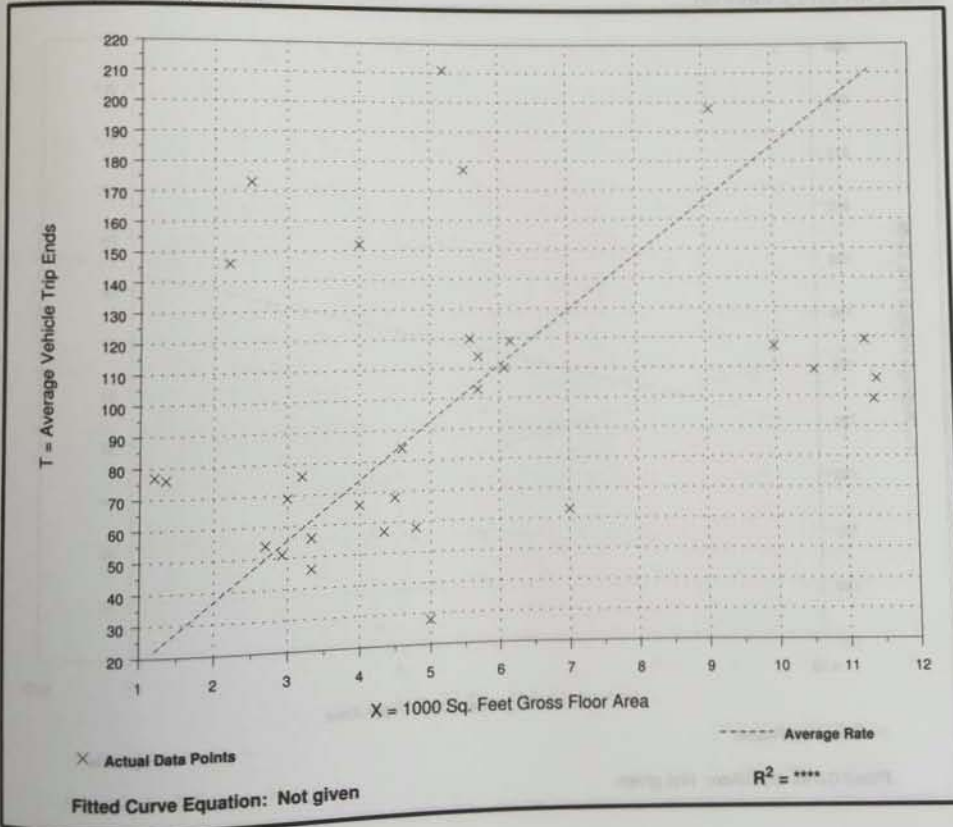
Average Vehicle Trip Ends vs: 1000 Sq. Feet Gross Floor Area  
On a: Weekday,  
P.M. Peak Hour of Generator

Number of Studies: 31  
Average 1000 Sq. Feet GFA: 5  
Directional Distribution: 54% entering, 46% exiting

## Trip Generation per 1000 Sq. Feet Gross Floor Area

Average Rate	Range of Rates	Standard Deviation
18.49	5.60 - 69.20	13.32

## Data Plot and Equation





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From: **Les Hartzman** <[les\\_hartzman@yahoo.com](mailto:les_hartzman@yahoo.com)>

Date: Fri, Sep 9, 2016 at 11:21 AM

Subject: SUNKIST ICON Proposal

To: "[Sarah.molina-pearson@lacity.org](mailto:Sarah.molina-pearson@lacity.org)" <[Sarah.molina-pearson@lacity.org](mailto:Sarah.molina-pearson@lacity.org)>, "[cd4.issues@lacity.org](mailto:cd4.issues@lacity.org)" <[cd4.issues@lacity.org](mailto:cd4.issues@lacity.org)>, "[councilmember.ryu@lacity.org](mailto:councilmember.ryu@lacity.org)" <[councilmember.ryu@lacity.org](mailto:councilmember.ryu@lacity.org)>

IT IS IMPERATIVE that you do everything possible on behalf of the homeowners/residents of Sherman Oaks to mitigate the significant negative impacts of SUNKIST ICON by STOPPING the proposed development .

Additionally, a 30-day extension is requested for the DEIR public comment window in order to allow sufficient time for public review.

Specifically, adding 300 MORE apartment units (and an estimated 900 people and 600 more cars!) to our area is OVER-development! Especially since IMT has recently built 6 massively-huge apartment complexes, three or more stories tall, and some being a city block long--ALL WITHIN A 3 MILE RADIUS HERE IN SHERMAN OAKS!!

I live in the area where the IMT buildings exist. They have added additional traffic to our streets that has increased congestion.

The proposed development at Hazeltine and Riverside for 300 more apartments should not be allowed to be built. There is already a huge traffic problem with the mall across the street. During the Christmas holiday season, the mall uses the Sunkist parking lot for overflow parking. If a new complex is put in, there will be no overflow lot available - forcing people to park in residential areas - taking spots away from the residents. There is also a heavily used Trader Joe's on the northwest corner of that intersection, which already causes parking overflow into the adjoining residential area (I've had to park there myself!).

There will also be additional traffic congestion at the freeway onramps at Van Nuys and Woodman avenues if even half of the cars from that project hit the streets.

Our lack of adequate public transportation or a transit plan has caused a huge traffic issue in the Valley. We can't allow continued overbuilding before we address the impacts to our infrastructure. We need to reduce cars on the streets and not add more to them. The air quality here has gotten worse over the years due to overdevelopment and a business-friendly AQMD.

Huge, multiple negative impacts to our community will result, namely:

WORSENING OF TRAFFIC

WORSENING OF AIR POLLUTION AND NOISE

LESSENING OF AIR QUALITY (and the destruction of many mature trees!)

DEEPER STRAINS TO PUBLIC SERVICES (police, fire, hospital, etc.), WHICH ARE ALREADY INADEQUATE!

300 MORE APARTMENTS IS ABSOLUTELY UNWARRANTED, and if built, would be done so at the sole benefit of IMT (and city) profits--and NOT in the service of the well-being of our community and its residents.

Thank you for your immediate and full cooperation on behalf of your constituents in Sherman Oaks!

Sincerely,

Les Hartzman  
5419 Columbus Ave.  
Sherman Oaks, CA 91411

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From: **Jeanette Resnik** <[jlresnik@hotmail.com](mailto:jlresnik@hotmail.com)>

Date: Wed, Aug 17, 2016 at 5:27 PM

Subject: SHERMAN OAKS: SUNKIST BLDG/IMT Apartment Development Opposition

To: "[sarah.molina-pearson@lacity.org](mailto:sarah.molina-pearson@lacity.org)" <[sarah.molina-pearson@lacity.org](mailto:sarah.molina-pearson@lacity.org)>

Cc: Brian Hirsch <[bhirsch\\_03@yahoo.com](mailto:bhirsch_03@yahoo.com)>

To Whom It May Concern/the office of Sarah Molina,

As residents of the Sherman Oaks Fashion Square, we are strongly in opposition of the development of the ~300 apartments + commercial use space proposed for the Sunkist site. This development would bring more traffic, poorer air quality, increased noise and may bring increased crime to the area. Please consider a more community friendly attraction such as a pocket urban park (e.g. dog park, meditation walking paths...etc.). Would even be open to an aesthetically pleasing, high-quality theater/restaurant experience. The neighborhood does not need more apartments for renters. There are plenty of options already in the area and in neighboring areas.

Thank you,  
Jeanette and Brian Hirsch

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From: **Sheri Hooper-Gross** <[sbhoop@icloud.com](mailto:sbhoop@icloud.com)>

Date: Mon, Sep 26, 2016 at 2:20 PM

Subject: Sunkist

To: [sarah.molina-pearson@lacity.org](mailto:sarah.molina-pearson@lacity.org)

Cc: [cd4.issues@lacity.org](mailto:cd4.issues@lacity.org)

To: Sarah Molina-Pearson and  
Councilman David Ryu

I am writing to comment on the DEIR for the proposed development located at Riverside drive and Hazeltine in Sherman Oaks.

As a homeowner and 20 year resident of the Fashion Square Area, I ask that you do everything possible to mitigate the negative impacts of SUNKIST ICON by both reducing the size and changing the design of the proposed development.

This project is simply too large for this area. This same developer has already built 6 huge complexes nearby, that are still not at full occupancy. The addition of 300 more units- in four story towers and multilevel parking garages-constitutes overdevelopment that will negatively impact this area in multiple ways:

1. The destruction of many mature trees will lessen air quality, change the microclimate and negatively impact the wildlife.
2. Traffic patterns that are already unacceptable will worsen. Intersections (especially Hazeltine and Riverside) will become even more clogged and dangerous by adding 300-600 more vehicles entering and exiting the complexes and fighting with existing Mall traffic.
3. The first two events listed above will provide an increase of air pollution and noise levels.
4. Both the extreme height of the proposed structures and the lack of setback from the streets create an oppressive silhouette, visual clutter and block the view of an iconic piece of architecture that celebrates the heritage of our neighborhood. The need to preserve open space is imperative.

This development MUST be significantly downsized! As proposed, it does not serve to the current or future well being of the local community.

Please recommend that this project be limited to commercial only, or commercial plus no more than 50 residential units. Please block any developer requests at rezoning or building variances.

Thank you for your immediate and full cooperation on behalf of your constituents in Sherman Oaks. Please keep me updated on any issues pertaining to this project.

Sincerely,  
Sheri Gross  
14024 Hesby Street  
Sherman Oaks, 91423

Sent from my iPad

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From: **Lindsay Howard** <[lhoward@apa-agency.com](mailto:lhoward@apa-agency.com)>  
Date: Mon, Aug 1, 2016 at 2:51 PM  
Subject: Sunkist/ICON Development  
To: "[sarah.molina-pearson@lacity.org](mailto:sarah.molina-pearson@lacity.org)" <[sarah.molina-pearson@lacity.org](mailto:sarah.molina-pearson@lacity.org)>

Hello Ms. Molina-Pearson,

I have never written to anybody concerning development in my neighborhood before, but perhaps that's because I've never felt so strongly about impending development.

My family recently moved onto Peach Grove Street in the North Fashion Square area in an effort to live the more idyllic suburban life that I grew up with. One where our kids can ride their bikes in the street and feel safe. One where, despite nearby proximity of the Fashion Square Mall, we have a reasonable amount of quiet. We feel like we moved to Mayberry. Our neighborhood is a close-knit community of single-family residences. We have block parties. We know our neighbors. We know when something feels amiss. While there is varied traffic congestion from the mall (particularly during holiday sales), we can still navigate the streets and appreciate that we aren't surrounded by major thoroughfares.

The proposed development of a nearly 300 residence apartment building and retail feels wildly out of place here. The few multi-family buildings that border our neighborhood on Riverside have been carefully thought through and don't allow for hundreds of additional cars or persons. Adding potential traffic bottlenecks will create congestion and allow for slowly emergency response times and difficulty in getting in and out of our homes. Also, if these people have children, the local schools are already overfilled with 40+ kids per classroom which severely impacts their ability to get a proper education. It's a volume that the neighborhood simply can't bear.

Additionally, there has already been a rise in crime from the construction of numerous residences nearby to the point where LAPD's response time to a recent crime was upward of 3 ½ hours. It's severe enough that our community has discussed hiring private security to patrol our neighborhood. Bringing more construction and more people to this area is the antithesis of what current residents have moved here for.

I hope that you'll consider these factors as you continue to discuss this development and we all look forward to continuing this conversation.

Sincerely,

**Lindsay Howard**

Partner, Television Literary | **APA**  
405 S. Beverly Drive, Beverly Hills, CA 90212  
(310) 888-4284  
[lhoward@apa-agency.com](mailto:lhoward@apa-agency.com) | [www.apa-agency.com](http://www.apa-agency.com)

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From: **Mary Ann** <[houseoftwelvepaws@hotmail.com](mailto:houseoftwelvepaws@hotmail.com)>  
Date: Wed, Aug 17, 2016 at 1:04 PM  
Subject: "ICON Sherman Oaks" Project  
To: "[sarah.molina-pearson@lacity.org](mailto:sarah.molina-pearson@lacity.org)" <[sarah.molina-pearson@lacity.org](mailto:sarah.molina-pearson@lacity.org)>

Dear Sarah:

I am writing to let you know that I am TOTALLY OPPOSED to the "IKON Sherman Oaks" (case #ENV-2014-1362-EIR) property project currently being proposed.

I have lived here since 1961 and have seen numerous changes to the area. We already have more than enough traffic now with the Mall and the Van Nuys Sherman Oaks Park right here.

And, the fact that this whole area would be impacted for 3 years building the project is absurd. The quality of life currently enjoyed in our area would be totally disrupted and completely

changed and not for the better. We do not need 298 additional apartments in this area....not to mention the number of automobiles associated with each apartment.

IMT Capital II Sherman Oaks, LLC should wait till the fires are out and go help all the folks that have will have lost their homes.

This company has built enough apartments in Sherman Oaks already...we do not need 298 more. And, I might add that none of these completed projects are very attractive.

Sincerely,

Mary Ann Jacobson  
4830 Calhoun Avenue  
Sherman Oaks, 91423

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From: **Kristi Clainos** <[kclainos@hotmail.com](mailto:kclainos@hotmail.com)>  
Date: Sun, Aug 21, 2016 at 9:04 PM  
Subject: Sunkist EIR request for extension  
To: "[sarah.molina-pearson@lacity.org](mailto:sarah.molina-pearson@lacity.org)" <[sarah.molina-pearson@lacity.org](mailto:sarah.molina-pearson@lacity.org)>

I am writing to please ask for an extension in the reviewing of these environmental effects of our neighborhood and environment based on the report that has been completed. It is extremely extensive and having read through it, it is concerning to me that they have largely labeled as "insignificant" or "insignificant with mitigation". the larger the document and the more errors, therein, the longer it takes to review and comment on the document. Please extend at least 30 days to take the care needed to evaluate this MASSIVE and what most in this area believe to be, a very poor proposal of use for this space.

Thank you,  
Kristi Jerome

Sent from my iPhone

Sent from my iPhone

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From: **R4GRLS** <[r4grls@sbcglobal.net](mailto:r4grls@sbcglobal.net)>  
Date: Tue, Aug 30, 2016 at 10:58 AM  
Subject: Sherman Oaks Development  
To: [sarah.molina-pearson@lacity.org](mailto:sarah.molina-pearson@lacity.org)  
Cc: [david.ryu@lacity.org](mailto:david.ryu@lacity.org)

Sarah,

Supporting the Sunkist and Chase Knowles project will only cause problems. Where will the kids go to school? Where will cars park? When will our streets be accommodating - Traffic is a problem NOW! The infrastructure cannot meet these needs and protect our neighborhood.

You are still allowing Mansionization to ruin our neighborhood – these oversized houses are way out of place.

What happened to your campaign promises?

Tom Jones, 5050 Matilija

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From: **R4GRLS** <[r4grls@sbcglobal.net](mailto:r4grls@sbcglobal.net)>  
Date: Tue, Aug 30, 2016 at 10:59 AM  
Subject: Sherman Oaks Development  
To: [david.ryu@lacity.org](mailto:david.ryu@lacity.org)  
Cc: [sarah.molina-pearson@lacity.org](mailto:sarah.molina-pearson@lacity.org)

Sir,

You promised to help us. Supporting the Sunkist and Chase Knowles project will only cause problems. Where will the kids go to school? Where will cars park? When will our streets be accommodating - Traffic is a problem NOW! The infrastructure cannot meet these needs and protect our neighborhood.

You are still allowing Mansionization to ruin our neighborhood – these oversized houses are way out of place.

What happened to your campaign promises?

Tom Jones, 5050 Matilija



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From: **R4GRLS** <[r4grls@sbcglobal.net](mailto:r4grls@sbcglobal.net)>  
Date: Sun, Sep 25, 2016 at 5:26 PM  
Subject: Letter and Comments related to the Sunkist project DEIR  
To: [cd4.issues@lacity.org](mailto:cd4.issues@lacity.org), [sarah.molina-pearson@lacity.org](mailto:sarah.molina-pearson@lacity.org)

Dear Councilmember Ryu, and City Planner Sarah Molina-Pearson,

Attached is a letter that discusses issues of concern and comments/questions to be addressed before moving forward.

I look forward to response.

Respectfully,

Tom Jones, Matilijan  
5050 Matilija Ave.  
[\(818\) 990-0191](tel:(818)990-0191)

### **Comments on H.3 Public Services – Education**

#### **a. Analysis of Project Impacts (from Executive Summary)**

##### **(1) Construction**

Explain “less than significant”.

##### **(2) Operations**

- You state inadequate capacity in the local schools. Explain how this project is a benefit to our community.
- You say that fees to the LAUSD would offset the impact with “less than significant” impact. How can that be when you state that there is inadequate capacity?

#### **b. Cumulative Impacts**

##### **(1) You state that cumulative impact with regard to schools would be less than significant. Define less than significant.**

##### **(2) This project has many more negative impacts than positive.**

### **Comments on: IV. Environmental Impact Analysis**

#### **H.3 Public Services – Schools**

#### **2. Environmental Setting**

##### **a. Regulatory Framework**

- (2b). With your discussion on (b) Senate Bill 50 and Proposition 1A – You state that the project impacts on school facilities from implementation of a project to less-than-significant levels. Define “less-than-significant levels.

##### **b. Existing Conditions**

###### **1. LAUSD**

- a. You discuss CSB 50 as providing funding. Does this funding cover maintenance and staffing? Are funds delivered to meet maintenance and staffing needs?
- b. In section (a) **Public Schools**
  - i. The school year hasn’t started in September in many years. They have been on an Early Start calendar since 2011.
  - ii. Under capacity overage – define “safety margin”.
- c. Under the five year projection you mention Van Nuys Middle. What impact will this project have on Millikan Middle
- d. Under the five year projection you mention Van Nuys High School, what will the impact be on Grant High School or North Hollywood High School – both closer than Birmingham CCHS. and Van Nuys High School.
- e. Under Charter school you fail to the local Charter schools. What else is missing in the report?

2. Project Impacts

a. Methodology

- i. It appears that your rates are from 2012 LAUSD Developer Fee. Define the current rate and the formula used.

b. Thresholds of Significance

- i. As a Retired LAUSD Administrator I disagree with the thresholds established by the City. I am a.

c. Project Design Features

d. Analysis of Project Impacts

- i. Operations – your own report states that local schools would have “seating shortages”. The scope of this project is and will have a negative impact on neighborhood schools.

4. Cumulative Impacts

In your summary it states that there are “seating shortages” at every level of education. These numbers out dated what are the current figures? Aren’t these numbers unreliable?

5. Mitigations Measures

You state that Project-level and cumulative impacts with regards to school would be less than significant and that no mitigation measures are required. **Define “less than significant”.**

6. Level of significance After Mitigation

You state that Project-level and cumulative impacts with regards to school would be less than significant. Define “less than significant”.

Dear \_\_\_\_\_,

As a concerned neighbor, 36 ½ years, just North of the project area on Matilija, I am voicing my opposition to this project. The proposed project is problematic for the infrastructure of our neighborhood as it relates to roads, water, sewer system, traffic, transportation, and aesthetics, etc.

With the other projects nearby, our streets are being used as “drive thru” streets. The safety of our streets are in question, traffic mitigation is inefficient, limited traffic enforcement, etc.

It goes without saying that the iconic landmark, Sunkist Building will be hidden.

By adding (?) numbers of units (numbers that change too often) at 100 even singles would mean 200 persons, 2 cars per unit; with 300 units that would mean 600 people – 600 cars.

Now, add the kids and our local schools, which by your report have limited space. I don't believe the writer did his/her due diligence to reflect current numbers. Neighborhood kids should be able to go to neighborhood school. The terms like “less than significant”, and “seating shortages”. **Define “less than significant”**.

We have seen too many projects in our neighborhood stripping us of community.

I am not opposed to reasonable development, but the developers that have come to Sherman Oaks only see opportunity and dollar signs. They present projects with no real regard for the community, and our City representatives are looking at tax revenues.

I understand that the property owners have the right to develop their property. They also have the responsibility not to impose themselves on others. This project will be a major imposition to the surrounding area and beyond.

Thank you for your consideration.

Sincerely,

Tom Jones  
5050 Matilija Ave.

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From: <[akatz24@aol.com](mailto:akatz24@aol.com)>  
Date: Tue, Aug 16, 2016 at 5:49 PM  
Subject: Stop the development at Sunkist building in Sherman Oaks  
To: [sarah.molina-pearson@lacity.org](mailto:sarah.molina-pearson@lacity.org)

This email is to voice my strong opinion that the development plans around the Sunkist building in Sherman Oaks should be stopped or cut back dramatically. The proposed amount on new shops and apartments will have a detrimental effect on this neighborhood and must be reconsidered. The amount of new traffic and noise will absolutely have a negative effect on our neighborhood that is already too congested. Please take in to account the quality of life in this Sherman Oaks area and put a stop to these outrageous plans.

thank you,  
Beverly Katz  
A resident of Morrison St. for 55 years.

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From: **Craig Kief** <[ckdp@craigkief.com](mailto:ckdp@craigkief.com)>  
Date: Thu, Sep 1, 2016 at 8:54 AM  
Subject: IMT development at Sunkist  
To: [sarah.molina-pearson@lacity.org](mailto:sarah.molina-pearson@lacity.org)  
Cc: [david.ryu@lacity.org](mailto:david.ryu@lacity.org)

Hello Sarah,

I just heard about the proposal for IMT to build 300 new units at the Sunkist property at hazeltine and riverside dr.

My wife and I both live nearby and are very concerned about the impact of such a large development at that location.

The traffic around there is already terrible and the streets are small. The mall, park, and trader joes are huge sources of congestion and are already constantly packed.

There has been a lot of development in our neighborhood recently with several new large apartment complexes. The increased noise congestion, pollution, and stress on public services has been growing rapidly and has yet to be fully realized. It's not a good idea to be adding another hugely impactful complex with potential for 900 people and 600 cars to this intersection, and should certainly not be done before the full impact of these other developments has been determined.

Craig and Jessica Kief

Valley Glen

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From: **Carol Koplan** <[clkoplan@earthlink.net](mailto:clkoplan@earthlink.net)>  
Date: Wed, Aug 17, 2016 at 12:40 PM  
Subject: Sunkist Building  
To: [sarah.molina-pearson@lacity.org](mailto:sarah.molina-pearson@lacity.org)

Hi Sarah.....I've lived in the Fashion Square area for over 60 years. The Sunkist building is a landmark and deserves to stay without condos or apartments all around it. Perhaps expanding Fashion Square into the area as a pretty walking Park or outdoor dining would be more appropriate. Grass in the parking lot and make it a park like setting. There is so much traffic already there with the mall, Trader Joes and other businesses there we don't need apt. buildings which will bring in more traffic and crime into our beautiful neighborhoods.

I have seen a rendering of what they want to do around the building and it is just awful. The Sunkist building is used for many commercials and TV shows and is a landmark. This would be lost. What can we do to keep it special and leave it alone. More people, more crime is brought into Sherman Oaks. The neighborhood has had to hire a private security company to watch our properties along with having our own security companies watch our houses. So if these are to be apts., it is just inviting more crime into our area.

Please help beautify Sherman Oaks, not cheapen it with apartments. Save Sherman Oaks Sunkist building and bring beauty and less traffic to our area.

Thank you, Carol Koplan



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From: **Jean Lang** <[langje14@gmail.com](mailto:langje14@gmail.com)>  
Date: Fri, Sep 2, 2016 at 2:59 PM  
Subject: ICON Sherman Oaks - City Case No. ENV-2014-1362-EIR  
To: [sarah.molina-pearson@lacity.org](mailto:sarah.molina-pearson@lacity.org)

I am writing to comment on the IMT Capital II Sherman Oaks, LLC proposed development located at 14130 and 14154 West Riverside Drive.

I am a 20+ year resident of Sherman Oaks and live on Katherine Avenue just to the west of the Sunkist building. Currently Riverside Drive is used by drivers as the alternate to the 101 Freeway morning and afternoon, and whenever the traffic is at a standstill on that freeway - which is most of the time. Residents are already plagued with speeding, traffic, congestion, noise, pollution and we've had several traffic fatalities and crosswalk injuries in our current state. The Westfield Fashion Square is a madhouse during holiday shopping periods throughout the year and driving east/west on Riverside Drive or north/south on Hazeltine is a risky venture during those periods of time. In fact, Riverside Drive is down to one lane for through traffic driving east during those periods, and cars get backed up to the freeway offramp on Woodman Ave waiting to make the left turn onto Riverside to travel west at that time. We are maxed out now and do NOT need to add more congestion to the roads in this neighborhood - they are not safe today.

IMT, armed with permits from the Department of City Planning, has crowded Sherman Oaks with boxy, unattractive buildings, transient population and traffic. A complete list of IMT apartments are proudly displayed on their website, and there are 10+ IMT developments in my immediate neighborhood - between Whitsett and Sepulveda and from Moorpark to Magnolia - the neighborhood I would walk in if it was safe to do so. IMT has created housing for thousands of renters in this defined space, proposes to add 300+ more to a very historical site, and is not only overtaking access and services for Sherman Oaks, but is destroying the quiet, single family ambiance of the surrounding neighborhood. IMT does not look at the whole neighborhood as a collective endeavor of the people who inhabit the space - they just replicate building after building in the same monotonous style and have single-handedly clogged our streets, crowded the parks and littered the environment with people, their cars and their pets/pet droppings. They do not lift their heads to see how real people are reacting to real spaces in this real community - just heads-down keep getting building permits approved, put buildings up and add hundreds of transient residents, while taxpayers are struggling to conserve water, replace outdated pipes, repair potholes and enlist our police force to help with the increasing crime activity and negotiate streets that are like parking lots during commute times. The most recent pedestrian vs car traffic fatality was on Riverside Drive at the corner of my street - how much more proof is needed for us to stop this addition?

Adding restaurants to the site and planning to serve alcohol does not serve this community. This neighborhood supports the restaurants already located in the adjoining mall and within walking distance on Ventura Blvd so those businesses thrive as planned, and we do not need to add more business activity to this corner.

Residents have the desire to create a Blue Zone in Sherman Oaks (proposed to the SO Homeowners Association) like the LA beach cities have done, and development such as this IMT project does not fit. Smart cities (and wise Mayors) across America are creating Blue Zone areas to foster healthy living environments, revitalizing neighborhoods in ways that benefit residents of all ages so that permanent residents are able to stay in our homes and neighborhoods as we age — connected to friends, family, activities and services— and to help older residents thrive. More and more, people of all ages want to live in neighborhoods that are easy to navigate on foot or by transit, with nearby shops and parks as well as cultural, educational and employment opportunities. There is not one thing that this IMT development would contribute to the betterment of the Sherman Oaks community as this project is defined today. Does the City not have a responsibility to preserve this historic Sunkist site too? Designation by the LA Conservancy of an historic site should provide some protection of a unique building and location for the future of LA's citizens. The property currently provides multiple, mature trees that help scrub the air pollution for local residents; the site is famous and used frequently in TV shows/movies; and it's a great place to walk around and exercise a pet up and down the building steps. Instead of pulling out the trees and filling the space with new apartments which would absolutely block anyone viewing the site from the street, the area should be repurposed, as is, into a cultural service center to this community. IMT then would be making a significant contribution to the City, the neighborhood and the future of the residents here, and that kind of contribution is way overdue from IMT.

To say that, even with mitigation, “no significant and unavoidable Project or cumulative impacts associated with these environmental topics are expected” is laughable - ALL of the issues addressed in the report will be negative impacts for the current residents of this area.

Thanks for taking all of these items into consideration.

Jean Lang.

RECEIVED  
CITY OF LOS ANGELES

AUG 25 2015

ENVIRONMENTAL  
UNIT

Christopher Le Crenn  
4955 Murietta Avenue  
Sherman Oaks, CA 91423

Ms. Sarah Molina-Pearson  
City of Los Angeles Department of City Planning  
200 North Spring Street, #750  
Los Angeles, CA 90012

Dear Ms. Molina-Pearson

August 15, 2016

It is with great distress that I read the enclosed notice regarding the Sunkist development project at the end of my street in Sherman Oaks. I was under the impression that the proposed monstrosity had been called off.

For the past year or so, I have seen the parking lot full of production trucks. Which is a very good sign in Los Angeles. I am aware that film and television production companies have made their home in the Sunkist Building. This is wonderful. As an actor, I am overjoyed to see local film and tv production. I had a wardrobe fitting there not long ago. It was a pleasure to be able to walk to work.

The Sunkist Building is an iconic structure, and it would be a shame to have it covered up by the horrible condominiums that are planned. In the drawings, one can only see the original building from the highway.

As many others have no doubt mentioned, the addition of eleven hundred cars would add a remarkable level of congestion to what is already a problematic intersection. During peak shopping periods, the mall employs crossing guards to help direct traffic. Getting out of my neighborhood can be tricky now. If the development happens, it will be a nightmare.

Not to mention the parking on my street, which is fine at present. We all know there will be more than one car for each unit. Those tenants will need to find a place to park their extra cars. They are sure to discover how easy it is to find parking right in front of my house, at which point it will no longer be easy for me or my roommates.

I understand perfectly well that huge development companies don't care about anything but profits, and that government people are far more concerned with bringing in those huge development companies than they are addressing the concerns of the current residents. So it is likely letters like mine will be discarded with no thought beyond reading, and the development will go ahead as planned. That is the way of the world.

Even so, I would like to add my name to the list of people who are objecting to this project, in the hopes that somehow it can be avoided.

Sincerely,



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From: **Annie Le Vantine** <[aalevantine@aol.com](mailto:aalevantine@aol.com)>

Date: Tue, Aug 30, 2016 at 4:17 PM

Subject: Sunkist redevelopment

To: "[Sarah.molina-pearson@lacity.org](mailto:Sarah.molina-pearson@lacity.org)" <[Sarah.molina-pearson@lacity.org](mailto:Sarah.molina-pearson@lacity.org)>, "[cd4.issues@lacity.org](mailto:cd4.issues@lacity.org)" <[cd4.issues@lacity.org](mailto:cd4.issues@lacity.org)>

To: Sarah Molina-Pearson, City of Los Angeles  
Councilman David Ryu

IT IS IMPERATIVE that you do everything possible on behalf of the homeowners/residents of Sherman Oaks to mitigate the significant negative impacts of SUNKIST ICON by REDUCING the size of the proposed development .

Additionally, a 30-day extension is requested for the DEIR public comment window in order to allow sufficient time for public review.

Specifically, adding 300 MORE apartment units (and an estimated 900 people and 600 more cars!) to our area is OVER-development! Especially since IMT has recently built 6 massively-huge apartment complexes, three or more stories tall, and some being a city block long--ALL WITHIN A 3 MILE RADIUS HERE IN SHERMAN OAKS!!

I understand that these recently-built IMT developments are NOT at full occupancy, making the addition of 300 MORE in the same area OVERDEVELOPMENT, unneeded, and undesirable.

Huge, multiple negative impacts to our community will result, namely:

WORSENING OF TRAFFIC

WORSENING OF AIR POLLUTION AND NOISE

LESSENING OF AIR QUALITY (and the destruction of many mature trees!)

DEEPER STRAINS TO PUBLIC SERVICES (police, fire, hospital, etc.), WHICH ARE ALREADY INADEQUATE!

This development MUST be significantly downsized to being either JUST COMMERCIAL or COMMERCIAL PLUS NO MORE THAN 50 APARTMENT UNITS.

300 MORE APARTMENTS IS ABSOLUTELY UNWARRANTED, and if built, would be done so at the sole benefit of IMT (and city) profits--and NOT in the service of the well-being of our community and its residents.

Thank you for your immediate and full cooperation on behalf of your constituents in Sherman Oaks!

Sincerely,

AnnieLeVantine

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From: **Jae Lee** <[sungjae.lee@gmail.com](mailto:sungjae.lee@gmail.com)>  
Date: Tue, Sep 27, 2016 at 10:18 AM  
Subject: Draft EIR Sunkist IMT  
To: [sarah.molina-pearson@lacity.org](mailto:sarah.molina-pearson@lacity.org)

Dear Sarah,

I am a resident of the Fashion Square Central neighborhood and have very strong concerns about the development of the Sunkist IMT building in our neighborhood. There is not enough capacity to handle that influx of people.

With that being said, I am aware that Wendy Brogin had developed a document of comments and I have reviewed. I am in agreement with her comments.

Reference: Wendy Brogin, 5043 Matilija Av Avenue, Sherman Oaks, 91423.

Please help us and our community by not allowing this to development to happen.

Thank you.  
Sung-Jae Lee  
14018 Addison St.  
Sherman Oaks, CA 91423

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From: Allison <[allileo1@yahoo.com](mailto:allileo1@yahoo.com)>  
Date: Tue, Aug 30, 2016 at 7:18 PM  
Subject: Sunkist Development  
To: [sarah.molina-pearson@lacity.org](mailto:sarah.molina-pearson@lacity.org)

To whom it may concern,

I cannot express strongly enough how vehemently opposed I am to the Sunkist building site being development into a 300 unit apartment/commercial development!

Traffic in that area is already congested and dangerous and getting worse. I have had so many life threatening near misses trying to get in and out of that Trader Joes and Fashion Square. It is terrifying. Not mention the freeway access at Riverside and Van Nuys Blvd.

I have lived in Sherman Oaks since 1992. I moved here from the west side because it was not congested, overdeveloped or high density and the quality of life was higher because of that.

Sherman Oaks is being overdeveloped and you need to put it in check. Immediately.

While I appreciate a lot of the new businesses and restaurants and community development, I strongly believe we have hit the tipping point where now instead of improving the quality of life with new restaurants and businesses, the development of more and more high density housing is dramatically decreasing the quality of life and resources available. I see time and again that a SINGLE family home is razed and replaced by a giant MANY unit condo complex. (Ex., the ENZO building just north of Casa Vega) It's TOO MUCH.

As the owner of 2 properties in Sherman Oaks I pay many thousands of dollars in property tax and I am starting to feel like I don't want to live here and am being driven out due to the constant construction that makes it very difficult, dangerous, and time consuming to traverse my neighborhood, as roads are blocked and large trucks are everywhere - as well as the increased population density that results from this overbuilding of overly large apartment complexes. The infrastructure and resources cannot keep up with this and it's rapidly becoming miserable to try to get through daily tasks.

Please, I beg you, do not let this happen to the Sunkist property.

The mansionization that is invading, taking over, and destroying my neighborhood is already too much.

Thank you,  
Allison Leo  
[818-203-8421](tel:818-203-8421)  
[allileo1@yahoo.com](mailto:allileo1@yahoo.com)

Sent from my iPhone

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From: **Barbara Levy** <[bdlevy21@yahoo.com](mailto:bdlevy21@yahoo.com)>

Date: Sun, Sep 25, 2016 at 2:59 PM

Subject: Sunkist/INTproject DEIR / vs 14026 Hartsook Street

To: "[councilmember.ryu@lacity.org](mailto:councilmember.ryu@lacity.org)" <[councilmember.ryu@lacity.org](mailto:councilmember.ryu@lacity.org)>, "[sarah.molina-pearson@lacity.org](mailto:sarah.molina-pearson@lacity.org)" <[sarah.molina-pearson@lacity.org](mailto:sarah.molina-pearson@lacity.org)>

I have been a resident of 14026 Hartsook Street, Sherman Oaks 91423 since 1968 and have seen the corners of Hazeltine/Riverside Drive built and developed when they were just empty lots. All have been an a benefit. However, there has been too much growth since then. Homes torn down and multi units replaced.

1. Northwest corner. Trader Joes
- 2 Northeast corner was a Gas Station/ Now DWP Bldg.
3. Southwest corner Sunkist Bldg.
4. Southeast corner Fashion Square

It is almost impossible to make a left turn on to Hazeltine from Hartsook Street from 7:00 to 10:00 in the morning due to people trying to get to the freeway and over the canyons. One terrible example of traffic was my attempt to go approximately one mile from my home to Van Nuys Blvd and Benefit Street to let someone into our temple kitchen. I planned twenty minutes to get there. However, it took 45 minutes. Instead of 8:00 I arrived at 8:30. Trying to get on the 405 from my home took me almost forty-five minutes. I try to stay as close to home now that I am retired.

In the almost 50 years as a resident of Sherman Oaks I now find it necessary to fight. I have lost two. A Nursery School secretly transferring a small house and a Mc Mansion built and now overlooking my backyard with no privacy. It is time, our elected officials and employees make sure the will of the people is number one on your agenda.

This Project INT DEIR should not be allowed. Taking a wonderful landmark and hiding it from the people is a mistake. That corner cannot sustain the additional 600 cars the building will bring. I hope you will give this matter your genuine consideration for the people not the stockholders of this company.

Hope you make the right decision.

I am,

BARABARA LEVY

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From: **Mikie Maloney** <[mmaloney@oakwoodschoool.org](mailto:mmaloney@oakwoodschoool.org)>

Date: Fri, Sep 2, 2016 at 11:32 AM

Subject: IMT ICON Project

To: "[sarah.molina-pearson@lacity.org](mailto:sarah.molina-pearson@lacity.org)" <[sarah.molina-pearson@lacity.org](mailto:sarah.molina-pearson@lacity.org)>

Cc: "[david.ryu@lacity.org](mailto:david.ryu@lacity.org)" <[david.ryu@lacity.org](mailto:david.ryu@lacity.org)>, "[sarah.dusseault@lacity.org](mailto:sarah.dusseault@lacity.org)" <[sarah.dusseault@lacity.org](mailto:sarah.dusseault@lacity.org)>, "[julia.duncan@lacity.org](mailto:julia.duncan@lacity.org)" <[julia.duncan@lacity.org](mailto:julia.duncan@lacity.org)>, Alice Roth <[alice.roth@lacity.org](mailto:alice.roth@lacity.org)>

Please extend the comment period for the ICON DEIR for the Sunkist property on Hazeltine and Riverside in Sherman Oaks. This is a massive document, with many detailed chapters. This is a project that will have a significant impact on the community and surrounding areas forever. It is also an iconic property that the community values and does not want to see obliterated or hidden. More time is needed to digest this document. Please extend the comment period.

Thank You,

Mikie Maloney

14214 Hortense St.

Sherman Oaks, CA 91423



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From: **Mikie Maloney** <[mmaloney@oakwoodschool.org](mailto:mmaloney@oakwoodschool.org)>  
Date: Tue, Sep 27, 2016 at 2:45 PM  
Subject: FW: ICON DEIR  
To: "[sarah.molina-pearson@lacity.org](mailto:sarah.molina-pearson@lacity.org)" <[sarah.molina-pearson@lacity.org](mailto:sarah.molina-pearson@lacity.org)>

**Please see below**

**From:** Mikie Maloney  
**Sent:** Tuesday, September 27, 2016  
**Subject:** ICON DEIR

To: Sarah Molina-Pearson, Department of City Planning

RE: ICON Sunkist Sherman Oaks DEIR

Date: September 27, 2016

Thank you for the opportunity to comment on the DEIR for ENV-2014-1362-EIR ICON Sherman Oaks, and for extending the comment period.

My name is Mikie Maloney. I have lived in Sherman Oaks since 1948 growing up in the immediate area – before the Sunkist Building was built. I grew up here, and, as an adult, raised my own family here. My husband and I have lived immediately south of the Sunkist property since 1974. We invested in the community by becoming homeowners, and I have invested my energies as a volunteer in many Sherman Oaks community organizations. I have been a board member of the Sherman Oaks Homeowners Association, the Sherman Oaks Town Council, the Van Nuys Boulevard/Cahuenga Pass Specific Plan Review Board, the Advisory Board for the Business Improvement District, the Sherman Oaks Design Advisory Committee for the Specific Plan, the Sherman Oaks Beautification Committee, Notre Dame High School, and the Land Use and Vision Committees of the Sherman Oaks Neighborhood Council.

Sherman Oaks is very important to me, and I, like many other residents, view the Sunkist Building, as an iconic and significant presence in Sherman Oaks. It is an oasis of calm, populated with mature trees and landscaping that brings relief to the eye and mind. It is a property, that when redeveloped, should continue to provide a feeling of openness and greenery as a showcase for the building itself. Understanding that the sale of this property offers a host of opportunities for development, it is also an opportunity for the new owner to create a remarkable, innovative and respectful project that honors its history and its significance in the community. It is an opportunity to create a signature project that is a community benefit to the area.

For this reason, I would like to submit my comments to the DEIR, in the hope that the community and the developer can support a project that is a source of pride for both.

Mikie Maloney  
14214 Hortense St  
Sherman Oaks, CA 91423  
[mmaloney@oakwoodschool.org](mailto:mmaloney@oakwoodschool.org)

**Traffic**

Overland Executive Summary

Pages iv - x

Hazeltine Access: The proposal to add left turn access onto the site via the most northerly Hazeltine driveway is not feasible. This new lane would interrupt the line for the left hand turn lane into the Westfield parking structure. That line begins to form as soon as cars turn off of Riverside onto Hazeltine. On busy days, the line stretches all the way from Riverside to the entrance to the parking structure. Additionally, the barriers that define the line are often run over by motorists which exacerbates the traffic issues in this area, as motorists execute U-turns to cross into the other side of the road. There is a DASH stop on Hazeltine immediately south of Riverside and another across the street on Hazeltine just before Riverside. These are valuable sources of transit, but they do cause motorists to move out into the roadway when the DASH is there. The section of Hazeltine from Riverside to Milbank is heavily traveled a lot of the day.

There should be no left hand turn into the site at the northerly driveway. A recommended mitigation for this stretch is to construct a concrete median such as the one on Riverside to safely confine the lines of traffic. There should also be a graphic of this proposal in the DEIR.

The proposed “enhancement” of the southerly driveway on Hazeltine from a two lane exit to a three lane exit will cause cars turning left from two lanes to fight for access to the right lane once on Hazeltine to allow for a right turn on Riverside – which is but a short distance away. It will also be a hazard when traffic control officers work in that intersection during busy periods at the mall.

Right Hand turn lane from Riverside to Hazeltine: this will take away existing parking spaces on Riverside which are constantly used. It will reduce pedestrian walkway and exacerbate the tree loss. It will also cause a potential accident as cars round the corner and run into the DASH parked there. The southbound cars turning onto Hazeltine from Riverside already have difficulty merging with traffic lined up for the mall.

Permissive left hand turning phasing in the northbound, eastbound and westbound direction at Hazeltine and Riverside: these left turn arrows need to be operational at all times and not on an “on demand” option. The need to facilitate left hand turns in all directions at this intersection is consistent throughout the day.

Move existing bus stop at Riverside and Woodman to the east side of the intersection: There is no safe place for a bus unless it is at the eastern corner of Riverside and Buffalo. There is a gas station with two curb cuts on Riverside; a small space in front of the cleaners which sits on an alley; and a single family home at the corner. There is a mitigation for the traffic backup on Woodman heading south, however. Use the two right hand lanes for entry onto the freeway (with signage) which allows more movement onto the freeway and eliminates the dangerous “extra” land that heads under the freeway and cuts off the other southbound lanes. Work with Caltrans to slightly widen the shoulder of the onramp to allow two vehicles to enter onto the freeway.

There is no mention of providing an enhanced entrance off of Riverside. If parking is to be lost by widening Riverside, then a dedicated right hand turn lane heading east onto the site should be created, and two left hand turn lanes into the site should be created, as there is not enough room to extend the existing left turn lane because it will run into the left turn lane for Trader Joes.

The intersections studied for impacts did not include Valleyheart, Milbank and Moorpark heading west. All of these streets are used for traffic between Van Nuys Blvd and Hazeltine. In the AM and PM the traffic on Hazeltine is consistent and fast. Many motorists speed to Ventura to find cross mountain routes like Beverly Glen. Motorists seek these east-west streets to access the 101 at Van Nuys Blvd. The Library Square neighborhood between Hazeltine and Van Nuys Blvd will bear a significant amount of traffic generated by this project. Right now it is often impossible to enter Hazeltine from Valleyheart because there is no signal at this intersection. Additionally, the timing of the signals at Milbank and Fashion Square Drive result in two waves of traffic traveling Hazeltine. When the Fashion Square Drive light at the parking structure and the Sunkist lot activates, it further reduces the opportunities for Valleyheart traffic to emerge. These signals all need to be calibrated to facilitate the Valleyheart situation or a crosswalk and light need to be introduced at this intersection. These streets need further study.

Dates of the Traffic Study: Tuesday, December 9 is not a particularly busy time for the Westfield Mall. Nor is Wednesday, January 14. The most congested times for the mall are around Thanksgiving, closer to Christmas and right

after Christmas. Weekends during October, November and December, and seasonal holidays are also busy. Recognizing that the mall is not part of this review, it still has an impact on the ICON project traffic. The traffic study should have been done recognizing this issue. The holiday season is approaching and the traffic should be studied during busy times. It may be that both the ICON management and the Westfield management form a partnership to provide traffic control in the area during certain times of the year.

#### Overland Traffic Consultants Report

##### Page 12: Transit Services:

The bus service on Riverside Drive is limited. The bus stops are not close together. There is no regular bus service on Hazeltine Ave. This site is not conveniently located for Metro bus service. It is not on a major transit line nor near a transit hub. The Van Nuys/Studio City DASH is consistent, but limited and does not run after 5:30 pm, making it of limited use for after-work commutes. The DOT is currently reviewing changes to this route which could impact the Hazeltine & Riverside location. The most effective way to provide residential and commercial transport to and from this location is by discounted transit passes; shuttles to and from key locations such as the Gold Line, Ventura/and major intersections; van pools; on-site bike and electric vehicle sharing areas; and providing incentives to on-site workers and tenants to live/work on-site. Providing accommodations in residential rental agreements to on-site workers would eliminate the need for transit to the site.

##### General Traffic Comments:

Three corners of the Hazeltine & Riverside intersection generate most of the traffic. A comprehensive study of Trader Joe's, Westfield and ICON traffic management could result in shared efficiencies for each employer and provide traffic and parking relief for the surrounding area. Workers could have free parking in designated areas at Westfield and ICON. Patrons could park at any of the sites and walk to the others. If, at any time, a parking fee is implemented, a program to validate among the three businesses should be developed.

The Community Plan is often mentioned, but it has not been updated in twenty years. Real planning should be done to develop a comprehensive strategy for the area. Development is not a bad thing – but bad planning is. We have an opportunity to plan our major Sherman Oaks corridors to accommodate residential and commercial uses. Transportation should be factored into the plan to accommodate development. While this project cannot bear the responsibility for a lack of planning, it can be in the forefront of good development, and must be.

#### **Aesthetics**

##### Page IV A-1

The visual character of this site will be negatively affected by the parking structure which will block a large portion of the Sunkist building, and will require removal of full growth trees and landscaping.

##### Page IV A-4

The surrounding neighborhood is low multifamily residential, single family residential and limited commercial. One short block houses Trader Joe's and one long block houses the Westfield Mall. Surrounding areas are residential. The project does not fit the scale of the neighborhood, and the placement of taller buildings on the perimeter of the site is out of keeping with the area.

##### Page IV A-7

This project is not pedestrian friendly. The Riverside and Hazeltine frontages are fortress-like. Even the softening mature trees will be removed and replaced by smaller trees – not on-site, but in the parkway. The current berm on Hazeltine provides greenery and a sense of separation from the street, and should be retained.

The overall visual character of the existing site is NOT just the Sunkist Building and large expanses of paved parking surfaces as stated. The visual character is shaped by mature, tall trees surrounding and on the site. The parking areas have lush landscaping and enhance the site while being functional. The impression is one of “greenery.” This will all be lost.

The impacts on aesthetics, view and shading will be significant. This project must be reduced in size; the buildings sited to keep the site open and retain the landscaping; and parking redeveloped for underground or at grade only.

**General Aesthetics Comments:**

There is no replacing the green and open space of the current site once buildings replace greenery. The applicant claims this is an underutilized site. But because it is not fully developed does not mean that it is not appreciated and valued by the community. The potential to develop while leaving open space is tremendous. The Sunkist building will be completely obscured along most of Hazeltine by a parking structure that could be reduced or relocated. This allows for an open space with public access that would eventually lead to a River Parkway benefitting the project and the community.

The proposed design is not in any way related to the Sunkist Building. There is no compatibility. The impression is monolithic and uniform. The parking structure is massive, and should be relocated on the site or placed underground with a plaza above.

**Conclusion:**

This is a site that deserves careful planning and respect for its history. There is an opportunity to provide a community benefit. In addition to offering river access, there is the potential for making it a community gathering spot – possibly a community meeting room in the Sunkist Building; or using the open space near the river access for the annual National Night Out sponsored by the LAPD. This is a site that lends itself to being a community resource.

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From: **Patrick McGowan** <[patrickbmcgowan@yahoo.com](mailto:patrickbmcgowan@yahoo.com)>  
Date: Tue, Sep 27, 2016 at 11:32 PM  
Subject: ICON Project EIR Response - McGowan 4726 Katherine Ave.  
To: "[sarah.molina-pearson@lacity.org](mailto:sarah.molina-pearson@lacity.org)" <[sarah.molina-pearson@lacity.org](mailto:sarah.molina-pearson@lacity.org)>, "[rziff@shermanoaksnc.org](mailto:rziff@shermanoaksnc.org)" <[rziff@shermanoaksnc.org](mailto:rziff@shermanoaksnc.org)>  
Cc: Sara McGowan <[sara.mcgowan@warnerbros.com](mailto:sara.mcgowan@warnerbros.com)>, Sara Frank <[sfmcgowan7@yahoo.com](mailto:sfmcgowan7@yahoo.com)>, Patrick McGowan <[patrick.mcgowan@disney.com](mailto:patrick.mcgowan@disney.com)>

To Whom It May Concern,

Thank you for your time to read this plea to stop the Sunkist ICON project.

If you have taken a look at the location and the plan of what IMT wants to build, you will know in your heart that it is the wrong thing to do - for so many reasons. It feels criminal that the city would allow this development that conflicts with existing land use and planning, choosing profit over what is the right thing for a neighborhood and the individuals in it. There is no true benefit to the overall area aesthetics, neighborhood enrichment, resident property value etc. that IMT is saying would happen with this development. We moved into our home 13 years ago because our agent told us there could be NO DEVELOPMENT at the Sunkist Building because it wasn't zoned for it. We thought we were safe to buy a home that would have the open area around such a beautiful property. In these years, there has been so much consumption of single family homes on Riverside drive and overdevelopment all over the area that this project would actually ruin what is a truly beautiful pocket of residential property. A last straw so to say of what a pocket neighborhood should be-destroyed. Isn't there enough of IMT on Riverside and other contractors in this very neighborhood? Why flank what is one of the most beautiful and iconic buildings in the valley with an ugly, cookie cutter IMT project?

I would like to have more details on the impact to the environment found in App\_A1.pdf page 10 of 1,309 where there is concern in a negative way that this proposed project MAY have a significant effect on the environment and what the Environmental impact report details. There are 12 out of 18 items checked page 12 of 1,039 for factors potentially affected and I'm sure a few more could be checked. MAY is an understatement.

I would like more details to the Environmental Impacts starting page 12 of 1,039 - so many X's for Significantly Impacted. AESTHETICS = Significantly Impacted

Aesthetics.....IV.A-1 B.

## **2. Environmental Setting**

### **a. Regulatory Framework**

### **b. Existing Conditions**

#### **(2) Views**

##### **(a) Visual Resources**

This section describes public views but does not elaborate on the negative impact to private views of the proposed ICON Sherman Oaks development. The ICON Sherman Oaks proposed development is located directly next to many private single family housing units. The height of the proposed buildings puts the new buildings in direct line of sight from many single family dwellings in the neighborhood. We are located on Katherine Ave. south of Riverside and the proposed new buildings will be directly visible from our back yard, bedroom, dining room, and family room. This means new apartments will have direct line of sight to our back yard, bedroom, dining room, and family room. We moved into this neighborhood largely due to aesthetics and this proposed development completely deteriorates the aesthetics we invested in. I have to mention our home is the largest asset we will ever have and we feel this development will deteriorate our quality of life and home value. I would like to see IMG describe the benefits of this development to the community's private views, which I do not see anywhere in the EIR.

### 3. Project Impacts

#### d. Analysis of Project Impacts

##### (1) Aesthetics

##### (a) Construction

##### (b) Operation

##### (i) Description of Visual Simulations

"Figure IV.A-6 on page IV.A-31 illustrates the conceptual view of the Project from Calhoun Avenue."

This view is not to scale and gives the impression that the buildings are much farther away from the private residences than they actually are. In my opinion, this perspective would be from 2 blocks away from the proposed development. The single family residences on Calhoun will be less than 50 feet (or less) from the new proposed buildings. Other single family residences, like ours on Katherine south of Riverside, will be closer than this rendering depicts. I would like to see IMG show the **REAL** view of this atrocity from the single family residences in the neighborhood west of the proposed development.

AIR QUALITY = Significantly Impacted

ORDINANCES TO PROTECT BIOLOGICAL RESOURCES = Requires Mitigation and to be Significantly impacted

CULTURAL RESOURCES = Significantly Impacted

GREEN HOUSE GAS EMISSIONS = Significantly Impacted

HYDROLOGY AND WATER QUALITY = Significantly Impacted

NOISE = Significantly Impacted

RECREATION = Significantly Impacted

TRANSPORTATION/TRAFFIC = Significantly impacted

UTILITIES & SERVICE SYSTEMS = Significantly Impacted

Please detail how the city is going to deal with the increase in cost due to significant impact this project will have on fire and police protection, school accommodation, park maintenance, roads and overall infrastructure. What about tax increases and over inflated house value assessments?

Please address why the city would allow a project that would degrade the quality of the environment and cause substantial adverse effects to human beings, as listed on page 23 of 1,039 of App\_A1.pdf.

There is so much the current DEIR has not defined, described, demonstrated or quantified. There are too many "feasible" statements and it totally lacks any the analyses/quantification of economic factors or analysis required for feasibility. Make IMT prove it or keep the space as is. In truth this property was never meant to be developed. Do the right thing. Stop ICON Sunkist from happening.\

Passionately,

Sara and Patrick McGowan  
4726 Katherine Ave.

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From: **Sharon** <[rmitsuya@ucla.edu](mailto:rmitsuya@ucla.edu)>  
Date: Thu, Aug 18, 2016 at 3:00 PM  
Subject: stop overbuilding  
To: [sarah.molina-pearson@lacity.org](mailto:sarah.molina-pearson@lacity.org)

Hello Sarah Molina,

I have lived in the SFV since 1950 and now with all the new and destructive IMT buildings our Valley has changed so very much. The quality of living here has deteriorated and this current government is giving in to rich builders and letting them do anything they want.

STOP the Huge apartment buildings in Sherman Oaks and North Hollywood. We have so much traffic that we don't dare leave our homes after 2:00pm to travel across the valley. What can us little tax paying people do to have justice and peace of mind? Crime is up the streets are bad and trash strewn. I am ashamed to have family and friends come to the Valley now and it is becoming worse all the time.

Stop the building in the Sunkist Building area. The Sunkist building is a historical building and in many architecture books. You cannot destroy that area with all of IMT buildings. Who owns IMT?

Why are there so many huge apartment complexes all over Sherman Oaks, North Hollywood and

several other Valley sites? Are they giving LA so much money that the politicians are getting rich while us little people are getting the worst living spaces ever seen in this San Fernando Valley?

Please give this message to Governor Garcetti and let him know his big goal of 100,000 apartments is ridiculous. Fix our Valley so it is livable again!!!!

Sharon Mitsuyasu, BSN

Ronald Mitsuyasu, MD

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From: **Manny Morden** <[mmse@roadrunner.com](mailto:mmse@roadrunner.com)>  
Date: Tue, Sep 6, 2016 at 3:49 PM  
Subject: Draft EIR  
To: [sarah.molina-pearson@lacity.org](mailto:sarah.molina-pearson@lacity.org)

Dear Ms. Molina-Pearson,

I am a resident in the immediate area of the property identified in the following Draft EIR and have a question:

*ENV-2014-1362-EIR*                      *State Clearinghouse Number:* [2014071001](#)

*Council District: 4 - David Ryu    Community Plan Area: Van Nuys - North Sherman Oaks*

*Project Location: 14130 and 14154 Riverside Drive, Los Angeles, CA 91423*

What are the “mitigation measures” referred to in the following statement (contained in the Draft EIR)? Are any “mitigation measures” included in the developer’s submittal?

*With implementation of mitigation measures, no significant and unavoidable Project or cumulative impacts associated with these environmental topics are expected.*

(There appears to be a conflict. If the topics are “significant and unavoidable” how can they be mitigated?

I look forward to your response,

**Manuel Morden S.E.**  
**MMSE Consulting Structural Engineer**  
[mmse@roadrunner.com](mailto:mmse@roadrunner.com)

13931 Branton Place  
Sherman Oaks, CA 91423  
Tel [818.981.7072](tel:818.981.7072)  
Mobile [213.215.3496](tel:213.215.3496)



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From: **Bev Nemetz** <[bevnemetz@pacbell.net](mailto:bevnemetz@pacbell.net)>

Date: Wed, Aug 24, 2016 at 4:23 PM

Subject: Case No. ENV 2014-1362-EIR ICON Sherman Oaks (14130 and 14154 Riverside Drive, Sherman Oaks area, City of Los Angeles)

To: [sarah.molina-pearson@lacity.org](mailto:sarah.molina-pearson@lacity.org)

I am requesting at least a 30 day Time Extension to review the Draft Environmental Impact Report for the ICON of the above referenced property. It is long and complicated, and I need this time to review and comment on it. I am very concerned about the increased traffic and environmental issues which would affect my property which is two blocks west of this project.

Thank You,

Beverly Nemetz

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From: **Renee O'loughlin** <[roloughlin7@gmail.com](mailto:roloughlin7@gmail.com)>  
Date: Mon, Aug 22, 2016 at 9:09 AM  
Subject: Sunkist project  
To: [sarah.molina-pearson@lacity.org](mailto:sarah.molina-pearson@lacity.org)

To Ms. Sarah Molina-Pearson,

I am writing to you about me and my neighbors concerns about the IMT project at the Sunkist building.

1. How would the neighborhood absorb more traffic, pollution and traffic. As a pedestrian I was hit by a car in the crosswalk by Trader Joes.

This last Saturday August 20th a young girl was killed on Riverside Dr. by a car.

2. How will the local schools absorb the influx of potential students?

3. How about our drought? All our yards are dead because we respect the need to conserve. Where is this water coming from for

300 new apts.? I read in the past when we were in a drought building slowed down. All I see is apt. after apt. being built and the

size of them is unbelievable.

4. I can barely get home when its Christmas time or Mothers Day with the Fashion Square traffic. I can't imagine what it will be like if

this project gets passed.

Please consider the effects it will have in our community.

Thank you, Renee Oloughlin  
4733 Katherine Ave.  
Sherman Oaks

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From: **Renee O'loughlin** <[roloughlin7@gmail.com](mailto:roloughlin7@gmail.com)>  
Date: Mon, Aug 22, 2016 at 4:42 PM  
Subject: IMT Sunkist project ENV-2014-1362-eir  
To: [sarah.molina-pearson@lacity.org](mailto:sarah.molina-pearson@lacity.org)

To Ms Sarah Molina-Pearson,

My name is Renee Oloughlin and I e-mailed you this morning about the IMT Sunkist project.  
I forgot to give the city case no. ENV-2014-1362-EIR

Thank you again,  
Renee Oloughlin

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From: **David Orr** <[david@david-orr.com](mailto:david@david-orr.com)>  
Date: Wed, Aug 17, 2016 at 4:46 PM  
Subject: Sunkist development  
To: [sarah.molina-pearson@lacity.org](mailto:sarah.molina-pearson@lacity.org)

Dear Ms. Molina,

I am writing to register my opposition to the IMTs plans to create 300 apartments at the Sunkist site. It seems a shame that such an iconic building is doing to be distorted to make easy for another cracker box. I'm also concerned about the type of apartments planned. Our area is currently residential, and I feel that making all of the units rentals will negatively impact the area. Additionally, the burden of an additional 600 cars seems hard to accommodate.

Is there any way to alter this course?

:: David Orr  
<http://www.david-orr.com>  
<https://instagram.com/davidorrrart>  
studio: [\(747\) 998-5492](tel:(747)998-5492)  
mobile: [\(917\) 743-8954](tel:(917)743-8954)

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From: **Viviana Ramirez** <[vdramirez2000@yahoo.com](mailto:vdramirez2000@yahoo.com)>  
Date: Tue, Sep 27, 2016 at 4:10 PM  
Subject: ICON Sherman Oaks DEIR comments  
To: Sarah Molina-Pearson <[sarah.molina-pearson@lacity.org](mailto:sarah.molina-pearson@lacity.org)>

**September 27, 2016**

**TO: City of Los Angeles - Department of City Planning**

**ATTN: Sarah Molina Pearson - sarah.molina-pearson@lacity.org - LA Dept City Planning  
200 N. Spring Street, Room 750 - Los Angeles, CA 90012 (213)473-9123**

**CC: Council Distric: 4 - David Ryu  
Diana Kitchen - Diana.Kitchen@lacity.org**

**FROM: Viviana D. Ramirez - vdramirez2000@yahoo.com  
4815 Stansbury Ave., Sherman Oaks, CA. 91423**

**RE: ICON Sherman Oaks  
CITY CASE NO. ENV-2014-1362-EIR SCH. NO. 2014071001**

Dear Ms. Molina-Pearson,

I am a homeowner, resident, voter and a concerned citizen of Sherman Oaks, CA. I read the entire Draft Environmental Impact Report (DEIR) for the ICON project, and the following is a list of my comments and complaints in a plain and simple form:

1. Hard to understand. The report is hard to comprehend by normal people that do not have a P.H. D. in these matters. The question is, was this done on purpose?
2. Most of the environmental issues concluded in "less than significant". This, to me is complete non sense. Common sense does not allow me to accept the fact that these issues together or separate will have a "less than significant" impact on the environment and therefore us. So, again another question developed: who assigned and paid for this report?
3. Traffic: I will comment on this issue specifically because it is just outrageous that the traffic study was done during a period that undoubtedly benefits the applicant and dismisses each and every comment done by the neighbors. Still, using the best time of the year to drive through the area the DEIR concluded in significant impact.

I hold the City and those in power, completely responsible for each and every accident that will occur due to the approval this unnecessary huge development. The neighbors addressed and emphasized the traffic issue repeatable and this will not be ignored by those responsible in allowing this danger to increase.

If the Project purposed, and most of its alternatives as well, depended on the safety of our community especially our children this project would automatically be denied any zoning change.

ZONING: The actual zoning was put in place to protect the community. This should not change just to benefit corporate greed.

For my conclusion I will refer to the conclusion of my previous letter because I sincerely feel we, as a community, were completely ignored.

## **CONCLUSION**

As neighbors of Sherman Oaks, we live, breathe, and tolerate all of our areas already increasing troubles. And now this? Is it not obvious that the General Plans will be highly affected? Is our area prepared for such change? Water, Electricity, Schools, Hospitals, Safety, Noise, Open Spaces, Traffic, Traffic, Traffic... Can our neighborhood sustain all of this? Do we have the budget for it? Do we need a Environmental Impact Report to know how strong of an impact? Who will pay the serious consequences later? Let's be responsible.

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From: **Sally Ray** <[sally@8thray.com](mailto:sally@8thray.com)>  
Date: Mon, Sep 26, 2016 at 12:00 PM  
Subject: IMT Sunkist DEIR comments  
To: [Sarah.molina-pearson@lacity.org](mailto:Sarah.molina-pearson@lacity.org)  
Cc: [cd4.issues@lacity.org](mailto:cd4.issues@lacity.org)

To: Sarah Molina-Pearson and  
Councilman David Ryu

I am writing to comment on the DEIR for the proposed development located at Riverside drive and Hazeltine in Sherman Oaks.

As a homeowner and 20 year resident of the Fashion Square Area, I ask that you do everything possible to mitigate the negative impacts of SUNKIST ICON by both reducing the size and changing the design of the proposed development.

This project is simply too large for this area. This same developer has already built 6 huge complexes nearby, that are still not at full occupancy. The addition of 300 more units- in four story towers and multilevel parking garages-constitutes overdevelopment that will negatively impact this area in multiple ways:

1. The destruction of many mature trees will lessen air quality, change the microclimate and negatively impact the wildlife.
2. Traffic patterns that are already unacceptable will worsen. Intersections (especially Hazeltine and Riverside) will become even more clogged and dangerous by adding 300-600 more vehicles entering and exiting the complexes and fighting with existing Mall traffic.
3. The first two events listed above will provide an increase of air pollution and noise levels.
4. Both the extreme height of the proposed structures and the lack of setback from the streets create an oppressive silhouette, visual clutter and block the view of an iconic piece of architecture that celebrates the heritage of our neighborhood. The need to preserve open space is imperative.

This development MUST be significantly downsized! As proposed, it does not serve to the current or future well being of the local community.

Please recommend that this project be limited to commercial only, or commercial plus no more than 50 residential units. Please block any developer requests at rezoning or building variances.

Thank you for your immediate and full cooperation on behalf of your constituents in Sherman Oaks. Please keep me updated on any issues pertaining to this project.

Sincerely,

Sally Ray  
8th Ray Design  
12734 Branford Street, Unit 1  
Arleta, CA. 91331

818-681-0802

[8thray.com](http://8thray.com)



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From: **community speaks** <[communitytoday@gmail.com](mailto:communitytoday@gmail.com)>  
Date: Wed, Sep 28, 2016 at 12:09 AM  
Subject: Sunkist Icon Project ~ Draft EIR  
To: [sarah.molina-pearson@lacity.org](mailto:sarah.molina-pearson@lacity.org)

Dear Ms. Sarah Molina-Pearson,

Thank you for the opportunity to comment on the Draft Environmental Impact Report.

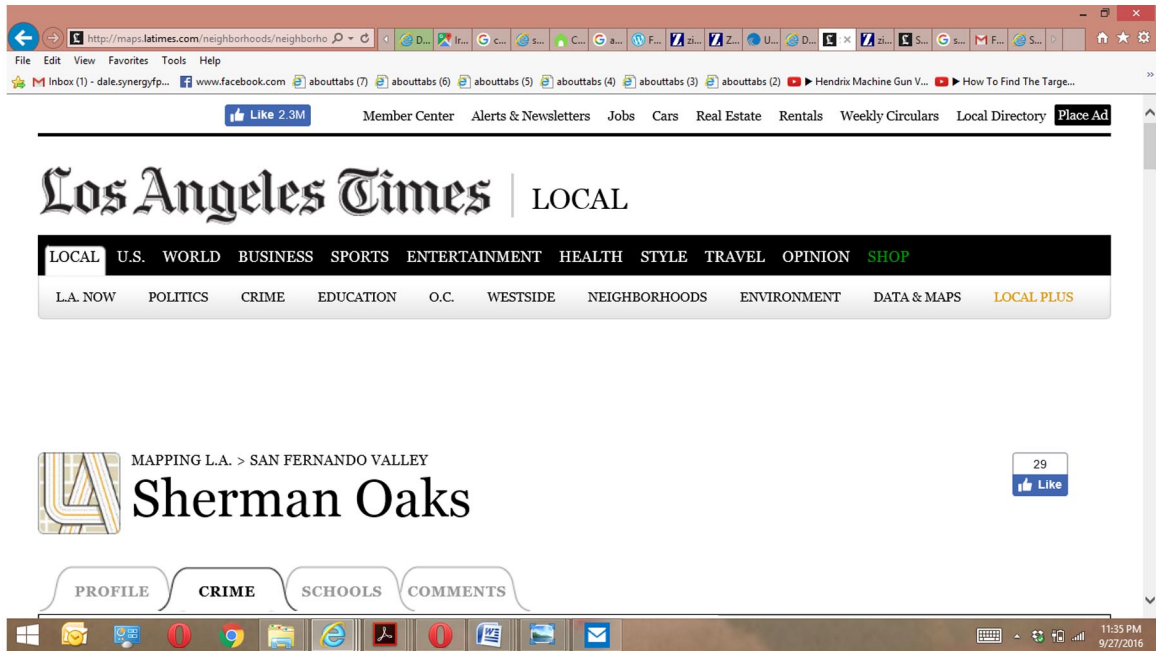
My first concern is the building of 298 apartment units behind one of our most heavily traveled freeways in the valley, the 101, especially in light of the City Planning Commissions knowledge of the **Freeway Adjacent Advisory Notice for Sensitive Uses** ( **\*see attached** ) , which clearly states "Review of recent air pollution studies shows a strong link between the chronic exposure of populations to vehicle exhaust and particulate matter from roads and freeways and elevated risk of adverse health impacts, particularly in sensitive populations such as young children and older adults. Areas located within 500 feet of a freeway are known to experience the greatest concentrations of fine and ultrafine particulate matter (PM), a pollutant implicated in asthma and other health conditions. In 2003, the California Legislature enacted SB 352, which precludes the siting of public schools within 500 feet of a freeway; unless it can be shown that any significant health risk can be mitigated".

Clearly, adding more traffic to our already congested intersection at Hazeltine Ave and Riverside Drive will only compound the exposure to vehicle exhaust and particle matter, and if the community gatekeepers are placing community and people first, then moving forward with this project would only demonstrate a reckless disregard for the people who would live in those apartments and the local people who have to breath and deal with the additional vehicle pollution. Additionally, across from the proposed project is the Sherman Oaks Fashion Square mall which already receives a steady flow of cars and vehicle exhaust from the steady stream of daily and nightly visitors to the mall. Lastly, Riverside Drive is a major thoroughfare which fronts the proposed project and has non-stop traffic throughout the day as does Hazeltine Ave. Please consider.

Beyond the environmental impact of vehicle pollution, are the concerns of the further depletion of our precious and limited resources. We have no shortage of apartments in Sherman Oaks; we do seem to have a limited police force (\*attached for your review our crime rate for one week from SEPT. 15– SEPT. 21.), a limited water supply, limited school budgets, limited local medical facilities ... I can go on, but at this point the community planners and leaders should be well aware of what our community lacks in and I'm sure others have articulated all of this better than I before.

Any project that places profits before people is wrong, unless you don't care about people. I know much of what I have to say breaks with protocol and many of my comments are not specific to the Draft EIR report, still I felt it essential to go on record with my complete opposition to the Sunkist Icon project which appears to only benefit the few while placing a great burden upon our community and local Residents.

Dale Ruddiman/ Resident



# **ZONING INFORMATION (Z.I.) NO. 2427**

## **FREEWAY ADJACENT ADVISORY NOTICE FOR SENSITIVE USES**

**Effective: November 8, 2012**

**Council District: Citywide, within 1,000 feet of freeways**

### **Instructions:**

All applicants filing a discretionary application for which the City Planning Commission is the initial decision-maker or the decision-maker on appeal, shall receive a copy of the attached Advisory Notice. The Advisory Notice applies to the following types of discretionary applications:

<b>Discretionary Permit</b>	<b>LAMC Section</b>
Conditional Use Permits granted by the CPC	12.24 U
Density Bonus	12.21.A.25
Public, Quasi-Public Open Space Land Use Categories	12.24.1
Zone Change	12.32
General Plan Amendment	11.5.6
Major Project Review/CUP	12.24.U.14
Tentative Tract Map	17.06
Preliminary Parcel Map	17.50

Please review the "Frequently Asked Questions" attachment and refer any other pre-filing questions regarding the notice or its applicability to the Development Services Center (213) 482-7077 or [planning@lacity.org](mailto:planning@lacity.org). Inquiries regarding the applicability of the Advisory Notice to a specific project or case may be directed to the Project Planner assigned to the application.

# **FREEWAY ADJACENT ADVISORY NOTICE FOR SENSITIVE USES FREQUENTLY ASKED QUESTIONS**

## **1. Why am I receiving a copy of the Freeway Adjacent Advisory Notice?**

In recent years, the City Planning Commission (CPC) has taken an increased interest in projects classified as sensitive receptor sites, particularly schools and residential uses, in close proximity to freeways.

In order to inform applicants of the CPC's concerns on the matter and provide guidance for addressing this issue from the early inception of a project, the Freeway Adjacent Advisory Notice is being distributed to all applicants for new projects and expansions of existing development involving sensitive uses within 1,000 feet of freeways.

## **2. Why was 1,000 feet chosen as the boundary for the Advisory Notice?**

Freeways are a major stationary source of air pollution and their impact on the air we breathe and public health in cities has been and continues to be a subject of public health research. Scientific literature previously focused on impacts to immediately surrounding communities within 500 feet of freeways; however, recent studies have established strong links to negative health outcomes affecting sensitive populations as far out as 1,000 feet from freeways, in some instances up to one mile. The Commission felt that 1,000 feet would be a conservative distance that would include potential properties that could house populations considered to be more at-risk of the negative effects of air pollution caused by freeway proximity.

## **3. Are the recommendations in the Advisory Notice mandatory?**

The Advisory Notice is informational in nature and does not impose any additional land use or zoning regulations. It is intended to inform applicants of the significance of this issue for the City Planning Commission. Several recommended approaches are highlighted to assist in navigating through this complex issue; however, applicants need not adhere to any one particular method for addressing air quality impacts on a particular project. Project design features or conditions may be tailored to individual projects as deemed appropriate.

## **4. Is this a prohibition or a moratorium?**

The Freeway Adjacent Advisory Notice is not a prohibition or moratorium on new development near freeways. It is advisory only and serves as an early notification to applicants of discretionary projects who may not otherwise be aware of the potential impacts on future building occupants of siting a building near a freeway. The notice provides background on the issue and guidance that will assist the City Planning Commission in making required findings for discretionary approvals after considering the unique circumstances of each individual case.

## **ADVISORY NOTICE REGARDING SENSITIVE USES NEAR FREEWAYS**

**TO:** APPLICANTS FOR NEW PROJECTS AND EXPANSIONS OF EXISTING DEVELOPMENTS INVOLVING SENSITIVE USES WITHIN 1,000 FEET OF FREEWAYS

**FROM:** THE CITY PLANNING COMMISSION

**EFFECTIVE DATE:** NOVEMBER 8, 2012

### **CITY PLANNING COMMISSION'S STATEMENT OF CONCERN:**

The purpose of this notice is to alert applicants to the City Planning Commission's recent concerns relative to the placement of sensitive uses near freeways. In recent years, the City Planning Commission (CPC) has taken an increased interest in projects classified as sensitive receptor sites, particularly schools and residential uses, in close proximity to freeways.

### **APPLICABILITY AND INTENT OF THIS NOTICE:**

This notice serves to advise applicants for discretionary land use requests under the authority of the City Planning Commission of the Commission's concerns. Project design alternatives have been identified below. If integrated into the project design, these measures may help to reduce or address impacts and public health risks, and therefore, should be considered.

### **BACKGROUND:**

Review of recent air pollution studies shows a strong link between the chronic exposure of populations to vehicle exhaust and particulate matter from roads and freeways and elevated risk of adverse health impacts, particularly in sensitive populations such as young children and older adults. Areas located within 500 feet of a freeway<sup>1</sup> are known to experience the greatest concentrations of fine and ultrafine particulate matter (PM), a pollutant implicated in asthma and other health conditions. In 2003, the California Legislature enacted SB 352, which precludes the siting of public schools within 500 feet of a freeway, unless it can be shown that any significant health risk can be mitigated.

On January 26, 2009 the City Planning Department presented a report to the City Planning Commission in response an earlier Commission request for Department staff to outline recommendations addressing the issue of public health and freeway proximity. In response to a subsequent request on November 11, 2011, the Planning Department submitted a report in January 2012 outlining potential mitigation measures for housing projects in proximity to freeways. On July 12, 2012 the CPC directed staff to prepare an advisory notice notifying applicants of the Commission's interest and careful consideration of public health implications in their review of freeway-adjacent projects.

### **DEFINITION OF SENSITIVE USES:**

South Coast AQMD's [Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning](#), defines a sensitive receptor as a person in the population who is particularly susceptible to health effects due to exposure to an air contaminant.

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<sup>1</sup> Freeway, as defined in the Caltrans Highway Design Manual – Chapter 60, pg. 60-2: (May 7, 2012)  
“Freeway--A divided arterial highway with full control of access and with grade separations at intersections.”

The following are land uses (sensitive sites) where sensitive receptors are typically located:

- residences
- schools, playgrounds and childcare centers
- long-term health care facilities
- rehabilitation centers
- adult day care/convalescent centers
- hospitals
- retirement homes

#### **EXISTING ADOPTED POLICIES:**

The City's General Plan already contains adopted policies addressing health-based risks and outcomes. Below are a few that are directly related to the placement of sensitive uses near freeways.

**Air Quality Element Policy 4.3.1:** Revise the City's General Plan/Community Plans to ensure that new or related sensitive receptors are located to minimize significant health risks posed by air pollution sources.

**Housing Element Policy 4.1.9:** Whenever possible, assure adequate health-based buffer zones between new residential and emitting industries.

**Housing Element Policy 2.1.2:** Establish standards that enhance health outcomes.

A Finding of consistency with the existing policies in the City's adopted General Plan will be weighed in the Commission's consideration of each project, as set forth in LAMC Section 12.32 C.3 (Land Use Legislative Actions):

**"Procedure for Applications. (Amended by Ord. No. 173,754, Eff. 3/5/01.)** Once a complete application is received, as determined by the Director, the Commission shall hold a public hearing or direct a Hearing Officer to hold the hearing. If a Hearing Officer holds the public hearing, he or she shall make a recommendation for action on the application. That recommendation shall then be heard by the Planning Commission, which may hold a public hearing and shall make a report and recommendation regarding the relation of the proposed land use ordinance to the General Plan and whether adoption of the proposed land use ordinance will be in conformity with public necessity, convenience, general welfare and good zoning practice."

#### **STANDARD CONDITIONS AND DESIGN ALTERNATIVES TO CONSIDER:**

Currently, there is no requirement to provide mitigation measures to address diminished ambient air quality in projects that are developed "by-right" - that is, without discretionary approval. However, with projects that require discretionary approval, the City has an opportunity to impose conditions to lessen the effects of air pollution exposure.

Incorporating the following standard conditions can further enable the Commission to evaluate the merits of a project in order to make the required Findings.

Though impact analysis of the air environment on new sensitive receptors in proximity to transportation facilities is not required by CEQA, in the interest of providing information to the

public, and creating healthy communities, the following measures should be taken under advisement.

### **1. Conduct Site-Specific Health Risk Assessment**

The City Planning Commission advises that applicants of projects requiring an Environmental Impact Report, located in proximity of a freeway, and contemplating residential units, schools, and other sensitive uses, perform a Health Risk Assessment as a supplemental technical report. The Health Risk Assessment can provide valuable information to applicants in understanding any potential health risks associated with a project and will enable applicants to make informed decisions about site planning and design up-front, from the earliest stages of a project. A Health Risk Assessment is prepared by a qualified consultant who can: identify air quality levels particular to a specific project site based upon variables such as topography and prevailing wind patterns, for example; disclose potential health risks to future residents or occupants that may result from the project; and offer best practices to improve health outcomes, based upon emerging research and in accordance with policies of the South Coast Air Quality Management District (SCAQMD).

### **2. Improve Indoor Air Quality with MERV-Rated or HEPA Air Filtration Equipment**

As a condition of approval, the City Planning Commission may, at its discretion, impose a requirement that any project proposing sensitive land uses (as defined above) within 1,000 feet of a freeway shall be required to install and maintain air filters meeting or exceeding the ASHRAE Standard 52.2 Minimum Efficiency Reporting Value (MERV) of 11 or higher.

### **3. Further Reducing Exposure through Project Design**

- Building Orientation. Locate open space areas (courtyards, patios, balconies, etc) as far from the freeway sources as possible;
- Screening with Vegetation. Plant vegetation between receptors and freeway sources. Mature tree species such as redwood, live oak, and deodar trees have found to remove particulate matter<sup>2</sup>.
- Reduce Operable Windows. Consider designing a site plan that requires minimal operable windows on freeway-facing frontages.

### **FUTURE STEPS:**

The City may go further to address this issue in New Community Plans, as part of the new Health and Wellness Chapter of the General Plan Framework, and possibly through development standards in the Comprehensive Zoning Code Revision. In the interim this important issue will continue to be brought to the fore, and alternatives and conditions suitable to each individual project considered.

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<sup>2</sup> Cahill, Thomas A. 2008. Removal Rates of Particulate Matter onto Vegetation as a Function of Particle Size. Breathe California Sacramento-Emigrant Trails.  
<http://www.sacbreathe.org/Local%20Studies%20Vegetation%20Study.pdf>

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From: **Patti Russo** <[pattirusso@att.net](mailto:pattirusso@att.net)>

Date: Tue, Aug 30, 2016 at 8:01 PM

Subject: Sunkist Bldg.

To: "[sarah.molina-pearson@lacity.org](mailto:sarah.molina-pearson@lacity.org)" <[sarah.molina-pearson@lacity.org](mailto:sarah.molina-pearson@lacity.org)>

Please leave the Sunkist Building alone! And the last thing we need at that spot is another set of apartment complexes!

Against this!

Patti Russo,  
Sherman Oaks resident



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From: **Leda Shapiro** <[ledas@pacbell.net](mailto:ledas@pacbell.net)>  
Date: Mon, Sep 5, 2016 at 11:57 AM  
Subject: City Case ENV 2014-1362EIR State Clearinghouse #2014071001  
To: [sarah.molina-pearson@lacity.org](mailto:sarah.molina-pearson@lacity.org)  
Cc: Leda Shapiro <[ledas@pacbell.net](mailto:ledas@pacbell.net)>

Dear Ms. Molina-Pearson

We have been aware of this project developing for some time and have joined with community voices against it whenever possible. Those of us who live here do not need another traffic study to know the traffic is already a nightmare trying to get on the 101 at Woodman during rush hour (which gets longer every day). All N/S streets which have entrances to the freeway are already gridlocked and that last 1/2 mile getting to the freeway can take 20-30 minutes due to totally stopped/ gridlocked traffic.

You are talking about adding almost 400 apartments and additional retail. While it would be nice to have both the apartments (if they are affordable housing!) and the additional retail (we all love new restaurants) this is the **WRONG** place to do it. All the developers are wanting to develop within a block or two from freeway entrances and we just cannot have this.

In addition, building almost 400 new units of which a max of 40 would be “affordable” I think it unconscionable to be adding more unaffordable housing.  
This project should NOT get any variance!

We are tired of greedy developers making deals with the city and not caring about how it impacts those of us who have a life here.

Developing affordable housing is necessary...but NOT 10%, or even 20%. We are tired of greedy developers evicting and tearing down rent controlled and other affordable housing to build luxury, unaffordable apartments. This has directly contributed to the increase in our homeless population and we should be ashamed! We do not have a housing crisis. We have an affordable housing crisis.

We do not believe this project should be allowed to go forward!

Leda & Steve Shapiro  
Sherman Oaks

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From: **Kim Brown** <[jakbrown2002@earthlink.net](mailto:jakbrown2002@earthlink.net)>  
Date: Tue, Sep 6, 2016 at 5:34 PM  
Subject: Sunkist Building/EIR CASE NO. ENV-2014-1362-EOR (SCH NO. 2014071001)  
To: [sarah.molina-pearson@lacity.org](mailto:sarah.molina-pearson@lacity.org)

Dear Ms. Molina Pearson,

Our family has resided at 4834 Stansbury Avenue since 1977. The property is directly next door and up against the parking lot to Trader Joes just North of Riverside Drive and the main driveway to the Sunkist Building.

When my parents bought this house, this was a quiet area of Sherman Oaks. Trader Joe's was just a mom & pop speciality store, with a cheese shoppe and fresh sandwiches made by a nice older man named Sam. As you can see, we have ventured FAR off the path from that idyllic family neighborhood. Growth is inevitable. We love so many things about this area, BUT I can tell you that the overall impact to our neighborhood, if IMT develops at Sunkist, would be staggering.

I encourage city planning to sit at the end of my driveway the week of Thanksgiving and the week of Christmas. People shopping at the mall & Trader Joe's physically block my driveway with their cars. I have to fight to get out of my neighborhood. God forbid there's an emergency or fire. The street isn't wide enough for two cars. People turn around in my driveway when my children (I have three) are playing, riding bikes, etc. I have to place my garbage cans along my driveway to get any peace. The trucks at Trader Joe's load whenever they want; they drop truck tail gates at 5AM & 10PM. There's a city ordinance that they never adhere to. You cannot tell me that any looming construction company won't try to do the same thing while building at Sunkist?

**I'm not against McMansions, I'm not against logical development, I'm not a constant neighborhood complainer. I'm concerned for the air quality, the water quality, the SEWAGE, the impact on our schools, the trash, the noise, the careless drivers, the homeless problem, the drugs at the park, the lack of police officers, the LADWP (who can barely deal with their current customers). With the mall, Trader Joe's and the VNSO park, we are pretty packed to capacity here. You know it, IMT knows it, everyone knows it. I don't see it as a housing "crisis". It's the free market telling you that supply & demand works. If you flood the market with too much supply, no one will demand it.**

"You can't fight progress" most millennials bark back. No one is against process if it's logical. This project isn't logical. What about that vacant lot on Sepulveda next to the 101 & the Galleria? That's empty. Our quality of life would be ATROCIOUS on so many levels if this project were pushed through at Sunkist.

In closing, let me tell you that my 83 year old mother still lives here and I care for her (along with my three children 7, 10 & 14, and a successful career in animal medicine). My mother is 100% against this project. Her health isn't good; she has a terminal lung disease and it's hard for her to breathe - she's on oxygen. Dust from pollutants and construction would exacerbate her health issues. I'm not opposed to hiring legal council (en masse) to protect not only my mother's health, but my family's health, if this project were to move forward. The thought of her spending her final years dealing with something unnecessary like this over development at Sunkist is incredibly unsettling.

Thank you for your time.

Respectively,

Kimberley Smith-Brown  
Joyce Davis Smith  
4834 Stansbury Avenue  
Sherman Oaks, CA 91423  
[\(818\) 497-0222](tel:(818)497-0222)

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From: Nancy SOGOIAN <[cellbroker@sbcglobal.net](mailto:cellbroker@sbcglobal.net)>  
Date: Mon, Aug 22, 2016 at 9:43 PM  
Subject: SUNKIST ICON project  
To: [sarah.molina-pearson@lacity.org](mailto:sarah.molina-pearson@lacity.org)

Hello Sarah

I am a city of Los Angeles homeowner, taxpayer and voter who has owned a home in Fashion Square for over 21 years.

As you are likely aware, within the past few years, IMT has built approximately SIX HUGE, nearly block-long, three story high apartment complexes within a three mile radius here in Sherman Oaks. I'm under the impression that even though these MASSIVE building complexes have been for rent for a year or more, the buildings are NOT fully occupied. These six, huge apartments have already added THOUSANDS of residential units in our area, and I understand the rents are high as well, making them unaffordable to many.

**I AM ADAMANTLY OPPOSED TO IMT BEING GRANTED PERMISSION TO BUILD ANOTHER 298 UNITS IN SHERMAN OAKS AT THE SUNKIST ICON SITE AS IT REPRESENTS SIGNIFICANT OVER-DEVELOPMENT--AND WILL RESULT IN MULTIPLE NEGATIVE IMPACTS SUCH AS SIGNIFICANT WORSENING OF TRAFFIC, MEASURABLE WORSENING OF AIR QUALITY, AND INCREASED NOISE POLLUTION!**

In short, the negative impacts to our neighborhood would be profound--AND ARE UNNECESSARY!

I am in favor of the Sunkist building itself remaining, and the addition of a reasonable number of new retail and commercial establishments on the site; HOWEVER, THERE SHOULD BE **NO--I REPEAT--NO** residential units on the site whatsoever!!

The project EIR lists the negative impacts--and then ironically cites they are NOT negative impacts! Citizens are paying attention, Sarah!

Adding commercial/retail has the potential to benefit our community; however, the THOUSANDS of recently-built IMT apartments have no doubt fulfilled any current or future need for apartments within this immediate area--and adding anything more than 30 or 50 more units clearly represents OVER-DEVELOPMENT and can only be viewed as developer greed and building for profit at the community's expense.

PLEASE KNOW THIS COMMUNITY IS ADAMANTLY OPPOSED TO IMT BEING ALLOWED TO BUILD 298 MORE APARTMENTS AT SUNKIST ICON. 300 apartments potentially adds 900 more people (and 600 more cars) to our streets, which is absolutely excessive!

Thank you for taking all steps on behalf of the community of Sherman Oaks to register our opposition, and steps to curb the size and negative impacts that will ultimately result with overdevelopment. This community CANNOT handle 298 MORE units on that site.

Thank you for your attention to this--and other--requests to deny IMT's developer greed from irreversibly negatively impacting Sherman Oaks. Maintain the commercial/retail but please DENY all residential development at the site!

Sincerely,

Nancy Sogioian  
40 Year Homeowner, Voter, Taxpayer in the City of Los Angeles  
14014 Hartsook St. (ONE-HALF MILE FROM SUNKIST ICON)  
Sherman Oaks, CA 91423

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From: **Marcia Starr** <[marciabradyl979@yahoo.com](mailto:marciabradyl979@yahoo.com)>  
Date: Thu, Aug 18, 2016 at 9:27 AM  
Subject: Sunkist Building  
To: [sarah.molina-pearson@lacity.org](mailto:sarah.molina-pearson@lacity.org)

Hello,

I'm a Fashion Square resident and I strongly oppose the Sunkist plans that I've seen. It's really scary to think that more huge building are going to go up in our neighborhood. I've lived here for 20 years and the amount of traffic is just so bad now. It take me 15 minutes to get my son to school on Ventura and Dixie Canyon. We cannot add that many units to this area.

Thank you,  
Marcia Starr

Sent from my iPhone

August 13, 2016

Ms. Sarah Molina-Pearson  
City of Los Angeles, Department of City Planning  
200 North Spring Street  
Los Angeles, CA 90012

RECEIVED  
CITY OF LOS ANGELES

AUG 25 2015

ENVIRONMENTAL  
UNIT

Re: DEI - City Case No. ENV-2014-1362-EIR  
State Clearinghouse No. 2014071001

Dear Ms. Molina-Pearson:

I have lived in my home since April 1, 1960. The 101 and the 405 Freeways were not there. Now they are the busiest freeway interchange in the country. There was no Sherman Oaks Fashion Square. Now, on any given weekend, holiday, or special sale at Fashion Square traffic is a nightmare! Trying to get into Trader Joes across from the Sunkist Building is at times impossible. I do understand progress, but there are times one must say "NO MORE"!

The Sunkist Building has been a welcomed asset to Sherman Oaks. This building sits quietly away from the street and is an architectural masterpiece. It has not noticeably added any negative to the neighborhood. To destroy this site by adding more buildings, more apartments, more noise, and considerably more traffic would only make an already intolerable situation worse. Traffic on Hazeltine Avenue and Riverside Drive is already a hazard for anyone attempting to make a right or left turn from our neighborhood.

Please don't add more congestion! Help the residents of this community live in peace. Don't approve this project. I would doubt you will have a single resident that would give his or her approval to this project - if only we had the power to stop it.

This is my attempt to STOP this project.

Sincerely,



Marita Swenson  
5016 Ranchito Avenue  
Sherman Oaks, CA 91423

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From: **Trúc Tang** <[tructang@gmail.com](mailto:tructang@gmail.com)>  
Date: Tue, Jul 29, 2014 at 10:47 AM  
Subject: Re: ENV-2014-1362-EIR  
To: [sarah.molina-pearson@lacity.org](mailto:sarah.molina-pearson@lacity.org)

Hello Sarah,

I'm a local homeowner in Sherman Oaks. I'd like to submit my letter in opposition of the Icon Sherman Oaks development project. Please find attached the letter.

Thank you,

--

Trúc Tang

Dr. Sung-Jae Lee and Truc Tang  
14018 Addison St.  
Sherman Oaks, CA 91423  
818-995-8011

July 28, 2014

**Attn: Sarah Molina –Pearson, City Planning Department**  
**Re: ENV-2014-1362-EIR**  
**Department of City Planning**  
**City of Los Angeles**  
**200 N. Spring St. Rm 750**  
**Los Angeles, CA 90012**

Dear Sarah,

*We are home owners in the area of the ICON/Sunkist Project. We have great concerns about the impact of this project on our community. As residents in this area who shop, commute and walk around with small children, I think the following issues need to be considered completely in the Draft Environmental Impact Report.*

1. **Neighborhood Compatibility** – The conversion from a low density office building adjacent to a low density residential area to a 24-hour business, retail, entertainment and high density housing project will severely change the neighborhood. There is a large setback on most of neighboring properties with significant landscaping, mature trees and open space. The proposed project has none of these and completely eliminates the current lovely open space. ***The draft EIR needs to make study the overall impact on this quaint, quiet and pleasant area.***
2. **Environmental Concerns** – California is greatly afflicted with drought right now. Adding a large development as this, where most people will be renters and not accountable to their water usage and to water conservation will be devastating to the effort of water conservation to this area. Adding such a large development to this area puts a strain on the electrical grid in this area, increases the emission of greenhouse gases to the area and with the influx of cars, will impact air pollution. As parents of small children, I'm also concerned about air quality and the impact of increased air pollution for my children.
3. **Aesthetics** – The current neighborhood is largely made up of single and 2 story mid-1950's construction. The proposed project looks nothing like any other structures in the area. The modern, metal, monolithic structure is out of place. Currently, the mature trees in and around the property softens the impact. In order to accommodate the minimal setbacks and huge square footage all these mature large trees will be destroyed. These mature trees need to be replaced substantial large trees not with mere saplings that will not have appreciable softening effect until they have matured in 15-20 years. Conversation should be considered. ***The EIR should investigate and specify the size, amount and type of landscaping to effectively shield the neighborhood from the visual impact of this small incompatible city.***
4. **Traffic** - The site is situated such that it is bordered on the south by the LA River/101 freeway, and on the West by residential single family houses. This leaves only 2 streets for ingress and egress to the project. On the East, Hazeltine Avenue is already incredibly overburdened, particularly during the holiday season by traffic from the mall. This leaves only Riverside Drive. As proposed, the vehicular access will be provided via the current drive approximately 200 feet west of the traffic lights of Hazeltine and Riverside Drive. There is no effective way an additional traffic signal could be added to accommodate the huge

amount of added traffic. The stop light giving access to the parking garage on Hazeltine is already ineffective at controlling traffic flow. There is no effective way the additional burden of this massive development can be effectively mitigated or controlled. Even more concerning, it has been stated by the developers that their EIR will only take into account traffic flow during “normal” traffic patterns. It is stated in several places that the traffic study will be completed before November 2014. This will not look at all at the huge increase of traffic to the Mall during the November and December Holidays as well as Valentines day, Mothers Day and Fathers Day. Undeniably the busiest times of the year for this mall as well as any other retail business, such as they propose to have in their project. ***An accurate EIR will have to look at the traffic flow during a representative time period, not just a carefully selected snapshot.***

5. **Parking** – The project calls for 1245 parking spaces. The project managers have represented that this parking will be some security parking for the apartments and offices, and some parking for the retail and restaurants. They anticipate that they will be charging for the patrons of the retail and restaurants. As is typical for such developments, there will surely be many people who do not want to pay and will be parking on the surrounding residential streets. Streets that are already burdened by parking from the VNSO park, the Trader Joes Grocery complex as well as the Westfield Fashion Square Mall particularly at the high periods of retail traffic. As well, the guests of the future apartments will also resort to parking on the nearby residential streets. Restricted parking is a suggestion but will have a major negative impact on the visitors to VNSO park where there is already not enough parking to service the usage of this wonderful community resource. ***The Draft EIR must look at the effect this parking tsunami will have on the neighbors as well as the regional park.***
6. **Density** – The proposed development creates a destructive trifecta of negative influences. The combination of 300 residential units, 40,000 sqft of retail, 7,000 sqft of restaurants, and the current 120,000 sqft of office space creates a 24 hour city. This project will be busy all hours of the day and place an unmanageable burden on the community and infrastructure. The rental units will by their very nature force a completely different element into the area. The initial study does not anticipate any significant population increase. This just is not possible when considering the full impact of not just the residents but the office workers and visitors to the retail establishments. The population increase has an exponential impact due to the mixed use nature of this project. ***The EIR, contrary to the Initial study must realistically look at what all these new people in such a small area will do to the nature of the neighborhood.***
7. **Safety** – With this amount of density, the typical type of resident in apartments, the new presence of alcohol, as well as the limited access, there is grave concern for public safety in the areas of crime, fire and earthquake problems. This coupled with such a densely occupied space inherently will have more problems. ***The EIR must look at the negative impacts similar developments have had on the surrounding neighborhood.***
8. **Construction** - The proposed project will take approximately 33 months to complete. During this time the area will be shaken, rattled and asphyxiated. The massive amount of additional traffic, removal of dirt for the underground parking and all the other problems associated with a mammoth construction project of this type will negatively affect all residents of Sherman Oaks. The oversized scale will unduly burden residents to allow IMT to make massive changes to this property which are not allowed with current zoning. ***The draft EIR must specifically lay out the best practices for this construction process to impact the neighbors the least way possible, without regard to cost to the developer.***
9. **Other Nearby developments** – IMT has developed many new Apartment Units in the area over the past few years. There are other developers doing the same. There seems to be no consideration for other developments in the area. A very similar project at Sepulveda and the 101 freeway, Il Villagio Tuscano, which will add another 300 units as well as mixed use space, as well as anticipated significant addition at the ADJACENT Westfield Fashion Square, and the new Ralphs Super Market just blocks away. These NEW developments will surely place additional stress on the cities’ infrastructure. ***Any accurate EIR must be***



***aware of these developments and consider the near and far impacts of all these huge construction projects.***

Sincerely,

A handwritten signature in black ink, appearing to read "Sung-Jae Lee Truc Tang". The signature is fluid and cursive, with the first name "Sung-Jae" and the last name "Lee" on the left, and "Truc Tang" on the right.

Dr. Sung-Jae Lee, Ph.D. and Mrs. Truc Tang  
Homeowners of 14018 Addison St, Sherman Oaks, CA 91423

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From: **Trúc Tang** <[tructang@gmail.com](mailto:tructang@gmail.com)>

Date: Tue, Aug 23, 2016 at 7:23 PM

Subject: re: Case No. ENV 2014-1362-EIR ICON Sherman Oaks (14130 and 14154 Riverside Drive, Sherman Oaks area, City of Los Angeles)

To: [sarah.molina-pearson@lacity.org](mailto:sarah.molina-pearson@lacity.org)

Dear Sarah,

I have begun to read the draft EIR for the Sunkist building and plan to provide adequate feedback. However, the document is SO long and extensive and so I would like to request that the deadline be extended to at least 30 days past the deadline.

Thank you.

--

Trúc Tang

14018 Addison St.

Sherman Oaks, CA 91423

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From: **Trúc Tang** <[tructang@gmail.com](mailto:tructang@gmail.com)>  
Date: Tue, Sep 27, 2016 at 9:12 AM  
Subject: Draft EIR Sunkist IMT  
To: [sarah.molina-pearson@lacity.org](mailto:sarah.molina-pearson@lacity.org)

Dear Sarah,

I am a resident of the Fashion Square Central neighborhood and have very strong concerns about the development of the Sunkist IMT building in our neighborhood. There is not enough capacity to handle that influx of people.

With that being said, I am aware that Wendy Brogin had developed a document of comments and I have reviewed. I am in agreement with her comments.

Reference: Wendy Brogin, 5043 Matilija Av Avenue, Sherman Oaks, 91423.

Please help us and our community by not allowing this to development to happen.

Thank you.  
Truc Tang  
14018 Addison St.  
Sherman Oaks, CA 91423

---

From: Alex <[mdgnys@gmail.com](mailto:mdgnys@gmail.com)>  
Date: Tue, Sep 27, 2016 at 4:47 PM  
Subject: Sunkist IMT ICON DEIR Response  
To: [sarah.molina-pearson@lacity.org](mailto:sarah.molina-pearson@lacity.org)

To: Ms. Sarah Molina-Pearson, City of Los Angeles, Department of City Planning, 200 North Spring Street, Room 750 Los Angeles, CA 90012, [213-473-9983](tel:213-473-9983)  
Regarding: ICON Sherman Oaks Project (Sunkist Building Expansion); Case Number: ENV-2014-1362-EIR  
From: Alex Thompson, 4817 Calhoun Avenue, Sherman Oaks, CA 91423 – [mdgnys@gmail.com](mailto:mdgnys@gmail.com)  
Date: 9/23/2016

I have lived my home at 4817 Calhoun Avenue, Sherman Oaks for 16 years. My home is less than 500 feet from the proposed project. Before that I lived in the immediate neighborhood for 5 additional years.

I see many issues in the DEIR which will determine if this is indeed an asset to the community or one which will be a burden to the City for years to come. The DEIR failed in many ways to address the concerns of neighbors and I think they need to be corrected before this project can move any further forward.

This DEIR just like the proposed project is unworkable due to the pure Mass. The system of obtaining major zoning changes and city approval for massive projects is supposed to be accessible to a normal person. This report in its complexity and volume is impossible to read or understand much less put together a comprehensive response.

The developers have spent over 2 years and untold thousands and even hundreds of thousands of dollars putting together a report that gives the answers they want. They are well versed professionals. The public was given 60 days to review and respond to this Massive DEIR. At this point we must trust the city to work for the constituents and only grant CHANGES in zoning that are truly a benefit to the community. I wish I had the time to more thoroughly craft a complete response. I have a job, a family, and a house to maintain and support. I don't have the ability to spend this kind of time.

Thank you for your consideration.

Sincerely,  
Alex Thompson

## II Project Description II-1

3) pg II-3 – The existing building is 57 feet tall. But the report fails to address the fact that it sits upon a raised earthen platform. This is not addressed in regards to where the additional project will be situated. The 75 feet of the new 4-5 story buildings will surely dwarf the exiting architecture.

**\*\*the DEIR must more clearly depict the placement and elevations of the proposed buildings in relation to surrounding buildings**

### c.) Page II-21 FAR and Setbaks

The project as proposed, with the changing zoning allows for much closer setbacks than the building currently has. On Riverside Drive it is proposed to reduce to 10' setback from the street and on Hazeltine as little as 5' setback from the street. Currently the building is set way back from the street with surface parking lot and extensive landscaping. None of the surrounding buildings is this close to the street. The Fashion Square Building varies but ranges from 16-20 feet setbacks with a great variety of Elevations as well as significant mature landscaping.

The proposed project is a drastic change from the current building. As well it is extremely different from the neighboring buildings. The Fashion Square Mall on Riverside drive has a large open space on the corner of Hazeltine and Riverside. It has large mature trees and thick landscaping. The building itself is set back from the street at minimum 20' as much as 30' and is filled with thick, mature landscaping. The building itself has

multiple elevations.

To the west on both sides of the street the buildings which are a mix of smaller and medium sized apartments as well as single family residences and duplex/triplexes, are set well back from the street with a minimum of 15-20'. The only nearby building that is as close as the proposed project is Trader Joes shopping center which is comprised of single family buildings only.

It seems that no concern was paid to PREVALIING Setbacks or compatability with the surroundings. The shere mas and closeness of this project should be minimized to be somewhat closer to the current building as well as in harmony with other buidlings.

**\*\*The DEIR should outline surrounding building setacks with more information about their height and contours. With this information an analysis should be performed to determine the proposed projects compatibility with the neighborhood**

8) Necessary Approvals page 11-27

With the detailed planning they seem to be making this vague statement needs to be clarified.

“Other discretionary and ministerial permits and approvals that may be deemed necessary, including but not limited to, temporary street closure permits, grading permits, excavation permits, foundation permits, and building permits.

**\*\*The DEIR should clearly outline what the developers are asking for.**

### III Environmental Setting III-1

Overview of Environmental Setting III-1 (alsoIV.D Cultural Resources)

Concern was paid to the Architecture of the actual building but the writers of this report prove that they are completely missing the point of this architecture. The concrete reversed step design of the building is important, But INTEGRAL to this design is the open space and the mature trees surrounding the site. These provide a stark contrast to the harsh lines of the building architecture. It is also homage to the idea that Sunkist, an agricultural company, was headquartered here. This was surely a consideration of the design of the Architect. Otherwise the building would have place in the center of the lot or towards the front to enhance the view of the building. This shielding is clearly necessary for the integrity of the building to be maintained. The design of the new project clearly had no concern for this. They mention site channels as being able to see the Current Architectural Asset of the Sunkist Building. There is only 1 driveway that will afford any kind of view and this has very little peripheral access due to the extreme long driveway. The Draft Environmental Impact Report uses deceptively chosen renderings to give the impression that there will be some way to see the architecture. The main rendering they give shows the building from an almost birds eye view that only a Drone will be able to achieve. Even in this rendering it looks like the 4 stories of the current Building will appear above the new 5+ story buildings.

**\*\*The Draft Environmental Report should be required to use more accurate and honest street level views to depict whatever vestiges of a view of the Sunkist Building architecture there will be left.**

### Related Projects Page III-5

Table III-1 Related Projects

This table does not clearly identify current and proposed projects in their intent or size. Also, I know that this is not a comprehensive list. IE, On Magnolia just West of Hazeltine there is a large apartment building in similar planning stages at the Horace Heidt Property. This incredibly pertinent omission calls into question the integrity of the whole report

**\*\*The DEIR must re-examine other related projects and their Impact on the Community. The cumulative affect of this much building is of great concern but was barely considered.**

### IV Environmental Impact Analysis

#### Aesthetics IV.A-1

The surrounding buildings are largely 50's 60's and 70's construction which are compatible with sub-urban living styles. Buildings constructed since then have largely followed this lead in order to fit in. The proposed project is clearly a Modernistic 2016 style with harsh lines, extreme mass, and an Imposing Stance on the lot. The Mall is constructed with painted bricks, stucco and mostly shielded by dense vegetation. Other buildings have been designed with either greater setbacks, lower heights or a construction style that makes them blend into the quaint, charming community.

**\*\*The DEIR needs to do more to investigate if this project is compatible with the visual style of its surroundings or if it will stick out like a sore thumb.**

Thruout the report the authors discount any view factor. In fact, the very existence of the open space, the mature trees, the large surface parking lot and grove type planting of trees is in itself a VEIW that should be considered.

**\*\*The DEIR needs to consider the actual view of the Sunkist Building and surrounding as a positive factor that should be mitigated in the design of this new project**

#### Cultural Resources IV.D-1

The project does little to add to the culture of the Neighborhood, Community of the City of LA. Unless you consider yet another Strip mall, and overpriced apartments. There does not seem to be a great need for High End Luxury Apartments. At least none has been demonstrated in this DEIR

**\*\*The DEIR should investigate how the project could be an asset to the community by adding retail that is lacking or educational, provide real accessible open space or even provide Affordable housing to some of the people who provide the area services.**

#### F) Land Use and Planning IV.F-1

##### Table IV.F-1

Project Consistency with Applicable Objectives and Policies in the General Plan Framework

#### IV.F Land Use and Planning

##### Table IV.F-1 (Continued)

Project Consistency with Applicable Objectives and Policies in the General Plan Framework

City of Los Angeles  
SCH No. [2014071001](#)

ICON Sherman Oaks  
July 2016

Page IV.F-23

#### IV.F Land Use and Planning

##### Table IV.F-1 (Continued)

Project Consistency with Applicable Objectives and Policies in the General Plan Framework

Page IV.F-24

IV.F Land Use and Planning

Table IV.F-1 (Continued)  
Project Consistency with Applicable Objectives and Policies in the General Plan Framework

Page IV.F-25

IV.F Land Use and Planning

Table IV.F-1 (Continued)  
Project Consistency with Applicable Objectives and Policies in the General Plan Framework

Page IV.F-26

IV.F Land Use and Planning

Table IV.F-1 (Continued)  
Project Consistency with Applicable Objectives and Policies in the General Plan Framework

Page IV.F-27

IV.F Land Use and Planning

Table IV.F-1 (Continued)  
Project Consistency with Applicable Objectives and Policies in the General Plan Framework

Page IV.F-28

IV.F Land Use and Planning

Table IV.F-1 (Continued)  
Project Consistency with Applicable Objectives and Policies in the General Plan Framework

Page IV.F-29

IV.F Land Use and Planning

Table IV.F-1 (Continued)  
Project Consistency with Applicable Objectives and Policies in the General Plan Framework

Page IV.F-30

IV.F Land Use and Planning

Table IV.F-1 (Continued)  
Project Consistency with Applicable Objectives and Policies in the General Plan Framework

Page IV.F-31

IV.F Land Use and Planning  
Table IV.F-1 (Continued)

Project Consistency with Applicable Objectives and Policies in the General Plan Framework

Page IV.F-32



Source: Eyestone Environmental, 2016.

#### Page IV.F-5 General Plan Use

This chart shows that nowhere in the immediate area is there another high density project other than the already existing Fashion Square Mall which is effectively shielded from the neighborhoods. This is a conversion of the neighborhood to a different incompatible use.

#### I) Transportation/Traffic IV.I-1

##### b. Existing Conditions Intersection Levels of Service

Intersection turning movement counts for the 14 study intersections were collected in January 2015 during the typical weekday morning (7:00 A.M. to 10:00 A.M.) and afternoon (3:00 P.M. to 6:00 P.M.) commuter peak periods. The traffic counts were conducted during typical weekdays while there were no holidays, no rain, and schools were in session.

Part I Traffic/Transportation The very basis of this whole study proves that it is flawed. This project is located adjacent to the Regional Sherman Oaks Fashion Square Mall Bordered by Hazeltine on the East side of subject and sharing the thoroughfare Riverside Drive.

-Living adjacent to the mall it is easy for anyone to observe that during the year the mall has busy periods. Further proof of this is the need for the mall to employ traffic officers on Riverside Drive and Hazeltine to control the flow. By ignoring this fact the very methodology of this report is inaccurate and flawed.

-The busy periods are:

-Valentines Day, the before February 14

-Mothers Day, Second Sunday in May, a week before

-Memorial Day, Last weekend of May, The week surrounding the holiday for Numerous Sales

-Fathers day, 3rd Sunday of June, the week before

-4th of July, The holiday Week, Numerous Sales

-Labor day, First Monday in September, The week surrounding for Numerous Sales

-Halloween, October 31, Mall hosts special performance events

-Thanksgiving, November 4th Thursday, From the first Week November

-Christmas, December 25, Entire Month of December

This amounts to somewhere between 3-4 months of heavy traffic. None of these time periods were included in the study. This extra traffic load is not an anomaly and covers at least 25% of the year. For accurate results current traffic should be measured during one of these times.

During the scoping phase many (which are included in the Appendix) neighbors requested that the traffic study include a time period which accurately represents the traffic situation. Clearly these requests were not heeded. The traffic problems around the Fashion Square Mall and Particularly the Hazeltine and Riverside intersection of Trader Joes and the proposed project are well known. If IMT is allowed to build this project as proposed with the limited mitigation outlined the problems will get much worse. The city will be responsible forever with this dysfunctional and failing situation. A proper study should require more effective Study and mitigations as a condition of approval and construction.

**\*\*The DEIR needs to do an effective traffic study that encompasses some of these periods and on weekends.**

These are the times that will be most impacted by the project. The interesections and transit cooridors are failing much of the time. It is not a typical traffic pattern due to the existence of the Fashion Square Mall.

Allowances have been made for onsite parking. There is no discussion about unavoidable parking overflow into the closeby neighborhoods. The report mentions that there will be secured parking for the residents. This will reduce the number of publicly available space from the 1,345 total spaces. When asked if the "public" spaces will be charged the developer was elusive and unwilling to answer the question. As with every residential and retail building if parking is not easy and convenient then it will create extensive problems for neighbors finding parking for themselves. This omission is a grievous oversight. These neighborhoods are

between the VNSO Park, which frequently takes all available street parking as well as the Trader Joes Shopping center. This will undoubtedly need future attention. It should be a condition of zoning changes that the facility provide FREE parking to the public in perpetuity.

**\*\*The DEIR should investigate the impact this project will have on nearby parking. This should include the necessary proposed traffic study during construction as well as once the project is complete that will be necessary to get a Preferred Parking District to protect the neighbors quality of life**

## V. Alternatives V-1

A,B,C,D,F V-11 thru V-138

None of the alternatives are significantly less dense than the proposed project. The current status is 25% of the proposed density. A compromise somewhere between the current usage and the massive proposed usage should be considered carefully.

## List of Appendices

### Appendix A Initial Study/NOP/Nop Comment Letters

Reading thru many of these comments it is clear that the DEIR does not cover or investigate many of the comments made at that time. In particular the timing and methodology of the traffic study.

### Appendix C Historical resource Assessment

The Historical value of the Sunkist Building is undeniable. Orange Groves and those who ran and owned them largely built the area. The Sunkist Building is a monument to not only the notable architecture of the time but also the foresight and power of the Orange. The current proposal is a slap in the face to displaying the integrity of this building. The DEIR does not accurately cover this importance.

### C.2 Archaeological and Paleontological Service Letters

This area, along the LA River was frequented by Indigenous Indians. Artifacts have been found in the past. A careful survey of the area before it is further disturbed should be conducted.

## My Conclusion:

This project is oversized and incompatible with the current nature of the existing neighborhood. It is an extreme departure from the current usages. There are many negative issues that will be exacerbated and created thru these proposed zoning changes and approval of this project. The developer is not taking responsibility for most of them and the city will be left trying to mitigate impossible problems FOREVER. Los Angeles City should not approve this project until many questions are answered, corrected and mitigated to the highest level possible. This Draft Environmental Impact Report is biased in great favor of the developer. It took over 2 years for uninterested out of the area professionals to craft this report. The citizens have been given only 60 days to review it. In this short time many flaws have been discovered. I request that the report is corrected addressing the concerns that I and many other citizens express in our responses. And then the citizens should be given a reasonable fraction of the time they take to review the report.

---

From: **Blair Thompson** <[blair4homes@gmail.com](mailto:blair4homes@gmail.com)>  
Date: Mon, Sep 26, 2016 at 10:25 PM  
Subject: Icon Project DEIR Response Blair Thompson.docx  
To: [sarah.molina-pearson@lacity.org](mailto:sarah.molina-pearson@lacity.org)

Please enter my comments into the record regarding:

DRAFT ENVIRONMENTAL IMPACT REPORT

VAN NUYS–NORTH SHERMAN OAKS COMMUNITY

PLAN AREA

ICON Sherman Oaks Project

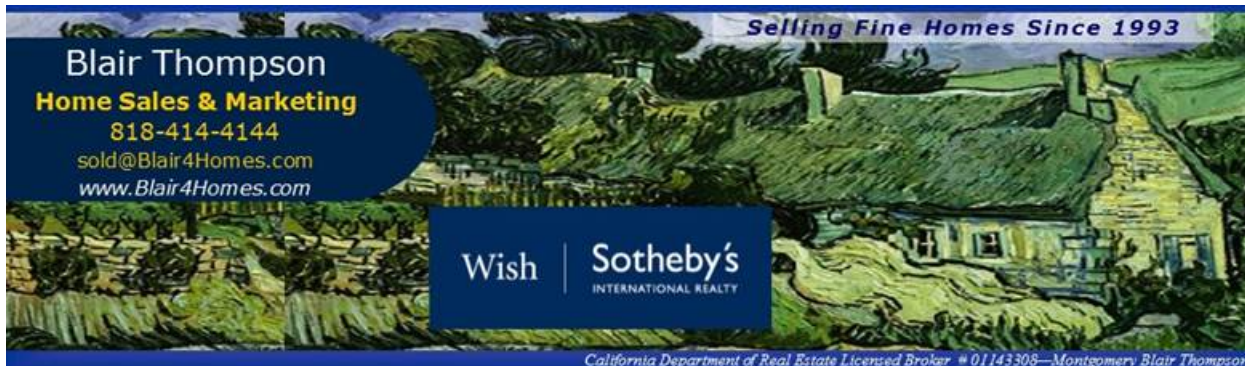
Case Number: ENV-2014-1362-EIR

Project Location: 14130 Riverside Drive, Sherman Oaks, California 91423

Council District: 4

Thank you!

**Blair Thompson**, *Broker-Associate*  
*Realtor, Home Marketing Specialist*  
**Wish Sothebys International Realty**  
[818-414-4144](tel:818-414-4144)  
[www.Blair4Homes.com](http://www.Blair4Homes.com)



CA BRE 01143308 – Montgomery Blair Thompson

To: Ms. Sarah Molina-Pearson, City of Los Angeles, Department of City Planning, 200 North Spring Street, Room 750 Los Angeles, CA 90012, 213-473-9983

Regarding: ICON Sherman Oaks Project (Sunkist Building Expansion); Case Number: ENV-2014-1362-EIR

From: Blair Thompson, 4817 Calhoun Avenue, Sherman Oaks, CA 91423 – [Blair4homes@gmail.com](mailto:Blair4homes@gmail.com)

Date: 9/23/2016

I have owned my home at 4817 Calhoun Avenue, Sherman Oaks for 16 years. My home is less than 500 feet from the proposed project. Before that I lived in the immediate neighborhood for 5 additional years. I am a licensed Real Estate Broker. I have earned my living for the past 24 years selling houses in the area. I have also flipped and developed several houses in the Fashion Square and surrounding areas. I am proud to say that the houses I have remodeled, rebuilt and expanded were all received by the neighbors as assets to the surrounding houses; fitting in with size, style and aesthetics.

Over the years I have been involved with Sherman Oaks Neighborhood Council as well as the Sherman Oaks Homeowners Association. I was president of the Parents Association of Sherman Oaks Elementary School for 2 years. My kids have been raised in this area and have enjoyed the nature of our neighborhood and the adjacent park.

I am clearly a long term resident with a vested interest and personal investment in the neighborhood and community. I am informed and want what is best for the community at large. The same cannot be said for the developers or the authors of this Draft Environmental Impact Report.

When notified about this development I had mixed feelings. It is clearly an underutilized piece of land. I knew that sooner or later it would be developed into something more productive. I only hoped that the owners would consider the neighborhood and realize that the highest and best use over the long term would be something that fits in.

During the scoping process I was horrified to realize the drastic changes the developers were proposing both in size and use. Multiple Significant Zoning Changes, Huge increases in Density, a complete divestiture of the current aesthetics, and a Massive increase in Traffic in the immediate and surrounding areas is proposed.

I mobilized my neighbors and we put together what I consider to be a sizable response to the Scoping and request for EIR. That is evidenced by the number of responses in the Appendix of the DEIR. Many of the letters were modified form letters that I wrote and distributed. I put together a grassroots campaign to address this myself during the scoping as well as once the DEIR was released.

Then I got the notice of the DEIR. I have been trying to address this for the past 50 days. As a citizen who has never addressed or even read an EIR before I am completely overwhelmed by it. This was drafted by a professional firm that does this day in and day out. To expect me to comprehend even on part of this report is absurd. The Executive Summary is over 200 pages not including tables, Charts, diagrams, pictures etc. The report is over 2000 pages long in size alone, the organization of the report is completely confusing with data and specific facts and finding buried in with generic boiler plate verbiage. In an attempt to rectify that I put together a seminar for the neighbors aimed at putting together responses that will be listened to. We had a very good showing of interested community considering a very short window of notice.

As I will try to outline in my response even I, unfamiliar as I am with these types of reports, have found numerous errors, overstatements and outright lies. I also take exception that many of the concerns raised in the scoping phase that were not addressed at all. It appears that the company performing the DEIR did not even read most of the comments that were made in the scoping not only dismissing them but ignoring them altogether.

I see many issues in the DEIR which will determine if this is indeed an asset to the community or one which will be a burden to the City for years to come. The DEIR failed in many ways to address the concerns of neighbors and I think they need to be corrected before this project can move any further forward.

This DEIR just like the proposed project is unworkable due to the pure Mass. The system of obtaining major zoning changes and city approval for massive projects is supposed to be accessible to a normal person. This report in its complexity and volume is impossible to read or understand much less put together a comprehensive response.

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Thank you for your consideration.

Sincerely,

Blair Thompson

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3) pg II-3 – The existing building is 57 feet tall. But the report fails to address the fact that it sits upon a raised earthen platform. This is not addressed in regards to where the additional project will be situated. The 75 feet of the new 4-5 story buildings will surely dwarf the exiting architecture.

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To the west on both sides of the street the buildings which are a mix of smaller and medium sized apartments as well as single family residences and duplex/triplexes, are set well back from the street with a minimum of 15-20'. The only nearby building that is as close as the propsed project is Trader Joes shopping center which is comprised of single family buildings only.

It seems that no concern was paid to PREVALIING Setbacks or compatability with the surroundings. The shere mas and closeness of this project should be minimized to be somewhat closer to the current building as well as in harmony with other buidlings.

**\*\*The DEIR should outline surrounding building setbacks with more information about their height and contours. With this information an analysis should be performed to determine the proposed projects compatibility with the neighborhood**

8) Necessary Approvals page 11-27

With the detailed planning they seem to be making this vague statement needs to be clarified.

“Other discretionary and ministerial permits and approvals that may be deemed necessary, including but not limited to, temporary street closure permits, grading permits, excavation permits, foundation permits, and building permits.

**\*\*The DEIR should clearly outline what the developers are asking for.**

### III Environmental Setting III-1

#### A) Overview of Environmental Setting III-1 (also IV.D Cultural Resources)

- a. Concern was paid to the Architecture of the actual building but the writers of this report prove that they are completely missing the point of this architecture. The concrete reversed step design of the building is important, But INTEGRAL to this design is the open space and the mature trees surrounding the site. These provide a stark contrast to the harsh lines of the building architecture. It is also homage to the idea that Sunkist, an agricultural company, was headquartered here. This was surely a consideration of the design of the Architect. Otherwise the building would have place in the center of the lot or towards the front to enhance the view of the building. This shielding is clearly necessary for the integrity of the building to be maintained. The design of the new project clearly had no concern for this. They mention site channels as being able to see the Current Architectural Asset of the Sunkist Building. There is only 1 driveway that will afford any kind of view and this has very little peripheral access due to the extreme long driveway. The Draft Environmental Impact Report uses deceptively chosen renderings to give the impression that there will be some way to see the architecture. The main rendering they give shows the building from an almost birds eye view that only a Drone will be able to achieve. Even in this rendering it looks like the 4 stories of the current Building will appear above the new 5+ story buildings.

**\*\*The Draft Environmental Report should be required to use more accurate and honest street level views to depict whatever vestiges of a view of the Sunkist Building architecture there will be left.**

#### B) Related Projects Page III-5

##### Table III-1 Related Projects

This table does not clearly identify current and proposed projects in their intent or size. Also, I know that this is not a comprehensive list. IE, On Magnolia just West of Hazeltine there is a large apartment building in similar planning stages at the Horace Heidt Property. This incredibly pertinent omission calls into question the integrity of the whole report

**\*\*The DEIR must re-examine other related projects and their Impact on the Community. The cumulative affect of this much building is of great concern but was barely considered.**

IV Environmental Impact Analysis

A) Aesthetics IV.A-1

The surrounding buildings are largely 50's/60's and 70's construction which are compatible with sub-urban living styles. Buildings constructed since then have largely followed this lead in order to fit in. The proposed project is clearly a Modernistic 2016 style with harsh lines, extreme mass, and an Imposing Stance on the lot. The Mall is constructed with painted bricks, stucco and mostly shielded by dense vegetation. Other buildings have been designed with either greater setbacks, lower heights or a construction style that makes them blend into the quaint, charming community.

**\*\*The DEIR needs to do more to investigate if this project is compatible with the visual style of its surroundings or if it will stick out like a sore thumb.**

Thruout the report the authors discount any view factor. In fact, the very existence of the open space, the mature trees, the large surface parking lot and grove type planting of trees is in itself a VEIW that should be considered.

**\*\*The DEIR needs to consider the actual view of the Sunkist Building and surrounding as a positive factor that should be mitigated in the design of this new project**

Cultural Resources IV.D-1

The project does little to add to the culture of the Neighborhood, Community of the City of LA. Unless you consider yet another Strip mall, and overpriced apartments. There does not seem to be a great need for High End Luxury Apartments. At least none has been demonstrated in this DEIR

**\*\*The DEIR should investigate how the project could be an asset to the community by adding retail that is lacking or educational, provide real accessible open space or even provide Affordable housing to some of the people who provide the area services.**

F) Land Use and Planning IV.F-1

Table IV.F-1

Project Consistency with Applicable Objectives and Policies in the General Plan Framework

Objective/Policy	Analysis of Project Consistency
Land Use Chapter	

<p>Objective 3.1: Accommodate a diversity of uses that support the needs of the City's existing and future residents, businesses, and visitors.</p>	<p>Consistent. The Project would contribute to the achievement of this objective by introducing a mix of complementary uses at the Project Site, including the development of 298 new residential units and approximately 39,241 square feet of neighborhood-serving commercial uses, including up to 7,241 square feet of restaurant uses, which would serve the community and future businesses. In addition, an approximately 28,000-square-foot (0.64-acre) publically accessible plaza area, referred to as the River Greenway, within the southern portion of the Project Site would provide access to the LA Riverwalk. The Project would also preserve and rehabilitate the existing Sunkist Building within the overall campus-like setting. <b>The proposed project will do little to enhance the lives of the community. The retail establishments in the area are well served by LOCALLY owned small establishments as well as those in the adjacent mall. The housing is high cost luxury singles with no accomatations for those who serve the community with lower paying service jobs. The open space will not be available to the general public.</b></p>
<p>Policy 3.1.2: Allow for the provision of sufficient public infrastructure and services to support the projected needs of the City's population and businesses within the patterns of use established in the community plans as guided by the Framework Citywide Long-Range Land Use Diagram.</p>	<p>Consistent. As discussed in Section IV.H, Public Services, Section IV.J, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR, and the Initial Study included in Appendix A of this Draft EIR, agencies providing public services and utilities to the Project Site would have adequate capacity to serve the Project. <b>The area is already underserved in the area of public services. Nearby Fashion Square neighborhood residents have take the measure of hiring a private security firm to fill needs that LAPD cannot fulfill. No provision is made by the ICON project to assist in the underfunded and stressed LAPD, LAFD and all other public services.</b></p>



Policy 3.1.3: Identify area for the establishment of new open space opportunities to serve the needs of existing and future residents. These opportunities may include a citywide linear network of parkland and trails, neighborhood parks, and urban open spaces.	<p>Consistent. The Project would provide a variety of open space and recreational amenities available to Project residents and guests, including lobbies, a lounge, fitness center, recreation room, pool and spa, and rooftop gardens and courtyards. The Project would include approximately 191,991 square feet (4.41 acres) of common open space areas, of which approximately 60,490 square feet would be landscaped. Approximately 107,793 square feet of the total common open space area would be publicly accessible. In addition, approximately 13,150 square feet of private open space would be provided. The new public open space areas would include landscaped entry plazas, planting areas with seatwalls, planted parkways, landscaped plazas, and an expansive lawn, which would be publicly accessible. A publicly accessible 28,000-square-foot River Greenway located along the southern portion of the Project Site would also increase publicly accessible open space on private property within the Van Nuys-North Sherman Oaks Community Plan area, provide access to the Los Angeles Riverwalk,</p> <p>The open spaces mentioned are mostly hidden from public view, 70,000 + on rooftop decks, much behind locked doors, and a smaller area near the LA River, which is completely underneath the overpass of the 101 freeway. This area is exceptionally noisy, dark and by most standards will have Impaired and unhealthy air</p>
Objective 3.2: Provide for the spatial distribution of development that promotes an improved quality of life by facilitating a reduction of vehicle trips, vehicle miles traveled, and air	<p>Consistent. The Project would provide a distribution of various uses throughout an existing superblock that would encourage residents and employees to walk to on-site restaurants and community-serving retail. The Project Site is also located in a High Quality Transit Area</p> <p>Socalled superblock will create an exceptional increase in traffic which cannot be mitigated. As is consistent with this area of the city the hoped for switch to alternate methods of transportation is unlikely to come to fruition. This may increase the quality of life for those living in this NEW development but it will not improve the quality of life of the current neighbors in any way.</p>

#### IV.F Land Use and Planning

Table IV.F-1 (Continued)  
Project Consistency with Applicable Objectives and Policies in the General Plan Framework

Objective/Policy	Analysis of Project Consistency
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pollution.	as designated by the 2012–2035 RTP/SCS. Further, as discussed in Section IV.I, Transportation/Traffic, of this Draft EIR, the Project Site would be located in an area well-served by public transit provided by Metro and LADOT DASH. In addition, the publicly-accessible open space areas proposed by the Project would promote walkability in the vicinity of the Project Site. The Project would also provide bicycle parking spaces in accordance with LAMC requirements for Project residents and visitors. Therefore, the Project would provide opportunities for the use of alternative modes of transportation, including convenient access to public transit and opportunities for walking and biking thereby, facilitating a reduction in vehicle miles traveled and related air pollution.
Policy 3.2.3: Provide for the development of land use patterns that emphasize pedestrian/bicycle access and use in appropriate locations.	Consistent. See Objective 3.2.
Policy 3.2.4: Provide for the siting and design of new development that maintains the prevailing scale and character of the City's stable residential neighborhoods and enhances the character of commercial and industrial districts.	Consistent. The Project would construct three new buildings that would provide for new residential and neighborhood-serving commercial uses within the Project Site. The proposed buildings would reach a maximum height of 75 feet, consistent with the existing 1L Height District. The Project would provide similar land uses as the surrounding area and would be appropriately scaled and compatible with the surrounding multi-family and single-family neighborhoods and commercial character. Specifically, the proposed buildings along the eastern portion of the Project Site would be similar in height to the adjacent Westfield Fashion Center's Bloomingdale's building located east of the Project Site. In addition, the proposed parking structure, which would be approximately 50 feet in height and constructed east of the Sunkist Building, would be lower than the existing Sunkist Building. Building B located at the corner of Riverside Drive and Calhoun Avenue would be approximately 60 feet in height and would provide a transition from the Westfield Fashion Square and the 75-foot-tall Building A located along Riverside Drive to the east. Building C, which would front the one-story single-family homes along Calhoun Avenue, would be the Project's lowest scale building and would be stepped down facing the residences across Calhoun Avenue to provide a transitional buffer from the uses across Calhoun Avenue. Thus, the Project would maintain the prevailing scale and character of the City's stable residential neighborhoods and enhance the character of commercial and industrial districts. <b>The proposed project is not in any way compatible with the neighborhood or the current use or building. The density planned exists nowhere else in proximity to the subject. The setbacks are inconsistent, the height is inconsistent, the number of units in an area is inconsistent, the aesthetics are inconsistent.</b>

Objective/Policy	Analysis of Project Consistency
<p>Objective 3.3: Accommodate projected population and employment growth within the City and each community plan area and plan for the provision of adequate supporting transportation and utility infrastructure and public services.</p>	<p>Consistent. As discussed in the Initial Study, which is included in Appendix A of this Draft EIR, the residential component of the Project would introduce approximately 894 new residents to the Project area. The Project's estimated 894 new residents would represent approximately 1.1 percent of the population growth forecasted by SCAG in the City of Los Angeles Subregion between 2014 and 2018. The Project would generate approximately 106 new jobs and would be within the employment growth forecasted by SCAG. Therefore, the Project's population and employment generation would be well within SCAG's projections for the Subregion, which serve as the basis for the General Plan Framework's projections. In addition, as discussed in Section IV.H, Public Services, and Section IV.J, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR, as well as the Initial Study included in Appendix A of this Draft EIR, the agencies and infrastructure that provide services and utilities to the Project Site would have capacity to serve the Project. If this project was at all accomadateing projected population growth it would have a wide range of availabilities includeing lower cost units for lower income residents, larger units for families, and ownership possibilities. This project has only one segment of the anticipated population growth accomadated, that which will make the developers the most money.</p>
<p>Objective 3.4: Encourage new multi-family residential, retail commercial, and office development in the City's neighborhood districts, community, regional, and downtown centers as well as along primary transit corridors/ boulevards, while at the same time conserving existing neighborhoods and related districts.</p>	<p>Consistent. The Project would introduce new residential and neighborhood-serving commercial uses to the Project Site, which is located along Riverside Drive. In addition, the Project would preserve and rehabilitate the existing Sunkist Building on-site. Riverside Drive is a designated an Avenue I in the Mobility Plan 2035. Riverside Drive is a primary transit corridor with several Metro bus lines and bus stops located in the vicinity of the Project Site. The Project Site is also located in a High Quality Transit Area as designated by the 2012–2035 RTP/SCS. Further, the proposed uses would be provided within the boundaries of the existing Project Site and would be compatible with the surrounding multi-family residential neighborhoods and commercial uses in the vicinity of the Project Site.</p>
<p>Policy 3.4.1: Conserve existing stable residential neighborhoods and lower-intensity commercial districts and encourage the majority of new commercial and mixed-use (integrated commercial and residential) development to be located (a) in a network of neighborhood districts, community, regional, and downtown centers, (b) in proximity to rail and bus transit stations and corridors, and (c) along the City's major boulevards, referred to as districts, centers, and mixed-use boulevards, in accordance with the</p>	<p>Consistent. See Objective 3.2 and Policy 3.2.4. This I already hurting the existing neighborhoods. The mere disclosure of this impending project and population growth is destabilizing the value and quality of the housing stock.</p>

Table IV.F-1 (Continued)  
Project Consistency with Applicable Objectives and Policies in the General Plan Framework

Objective/Policy	Analysis of Project Consistency
Objective 3.7: Provide for the stability and enhancement of multi-family residential neighborhoods and allow for growth in areas where there is sufficient public infrastructure and services and the residents' quality of life can be maintained or improved.	Consistent. See Objective 3.2, Policy 3.1.2, and Policy 3.2.4.
Policy 3.7.1: Accommodate the development of multi-family residential units in areas designated in the community plans in accordance with Table 3-1 and Zoning Ordinance densities indicated in Table 3-3, with the density permitted for each parcel to be identified in the community plans.	Partially Consistent. As described in Section II, Project Description, of this Draft EIR, the land use designation of the Project Site is for Community Commercial land uses. In addition, the Project Site is currently zoned C2-1L-RIO (Commercial, Height District 1L, River Improvement Overlay District), PB-1L-RIO (Parking Building, Height District 1L, River Improvement Overlay District), and P-1L-RIO (Automobile Parking-Surface and Underground, Height District 1L, River Improvement Overlay District). The Commercial zones permit a wide array of land uses such as retail stores, offices, hotels, residential dwelling units and theaters. The PB-1L zone permits a parking building, including those attached to or integrated with buildings. The PB zone also permits any use permitted in the P (Automobile Parking Zone), which includes surface parking. The Project Site's existing Community Commercial land use designation and C2 zoning currently permits a residential density of one unit per 400 square feet of lot area. Thus, development of the portions of the Project Site currently zoned C2-1L would permit approximately 300 residential units. Based on the Community Plan's Land Use Map, the Community Commercial land use designation corresponds to the CR, C2, C4, RAS3 and RAS4 zones. Therefore, to establish consistency between the Project Site's current land use designation and zoning throughout the entire site, the Project includes a request for a Zone Change from PB-1L-RIO to C2-1L-RIO and PB-1L-RIO and PB-1L-RIO to RAS3-1L-RIO. In accordance with the existing Community Commercial land use designation, the Project proposes to preserve the existing Sunkist Building and develop 298 new multi-family residential units around the perimeter of the Project Site. Therefore, the Project would be consistent with the densities established in the General Plan Framework. <b>This project wants to bring the zoning into compliance with the Community Plan. There is nothing in the community plan that says a lower zoning should be brought up to the highest density and development allowable. These are not minor insignificant technical zone changes. They are extreme departures from the current allowable uses.</b>
Policy 3.7.4: Improve the quality of new multi-family dwelling units based on the standards in Chapter 5 Urban Form and Neighborhood Design Chapter of this Element.	Consistent. The Project would introduce a mixed-use development consisting of residential and neighborhood-serving commercial uses in an urbanized area that features a similar mix of land uses. In addition, the Project would provide a variety of open space and recreational amenities available to Project residents and guests, including lobbies, a lounge, fitness center, recreation room, pool and spa, and rooftop gardens and courtyards. The Project would also enhance the walkability of the area by

Table IV.F-1 (Continued)  
Project Consistency with Applicable Objectives and Policies in the General Plan Framework

Objective/Policy	Analysis of Project Consistency
	<p>providing a publicly accessible 28,000-square-foot River Greenway located along the southern portion of the Project Site. In addition, as discussed in Section IV.A, Aesthetics, of this Draft EIR, the Project's design would employ elements to ensure compatibility with surrounding land uses, including building fenestration, variations in surface materials and colors, and tiered building heights. Further, the Project would incorporate elements that would promote individual and community safety, including proper lighting of building entries and walkways to provide for pedestrian orientation to clearly identify a secure route between parking areas and points of entry into buildings, and sufficient lighting of parking structures, elevators, and lobbies to reduce areas of concealment, at Project build-out. <b>The so called open areas are not open to the public. The project will not improve the neighborhood. The mix of unit sizes appeals to a largely Transient population. These types of tenants will do little to help the community. As renters they do not have a vested interest in maintaining a valuable community standard.</b></p>
<p>Policy 3.10.4: Provide for the development of public streetscape improvements, where appropriate.</p>	<p>Consistent. The Project would install new street trees and perimeter landscaping along the Project Site's Riverside Drive and Hazeltine Avenue frontages that would enhance the streetscape environment and create and promote pedestrian activity along these street segments. Further, appropriate and contextual landscaping would be utilized along the edges of the Project Site to create green visual buffer zones from the neighboring building, thereby enhancing privacy. <b>In order to bulid this project they will be destroying a beautiful stand of mature trees along 3 sides of the property. They will be building the structures much closer to the street than the current open landscaping. This project will be a significant downgrade from the current status and will be less appealing than other surrounding properties</b></p>
<p>Objective 3.18: Provide for the stability and enhancement of multi-family residential, mixed-use, and/or commercial areas of the City and direct growth to areas where sufficient public infrastructure and services exist.</p>	<p>Consistent. See Policy 3.1.2 and Policy 3.2.4. <b>See response to See Policy 3.1.2 and Policy 3.2.4</b></p>

Housing Chapter	
Objective 4.1: Plan the capacity for and develop incentives to encourage production of an adequate supply of housing units of various types within each subregion.	Consistent. The Project would support this objective through the development of 298 new multi-family residential units consisting of a variety of unit types. If this project was at all accomadateing projected population growth it would have a wide range of availabilities includeing lower cost units for lower income residents, larger units for families, and ownership possibilities. This project has only one segment of the anticipated population growth accomadated, that which will make the developers the most money.
Objective 4.2: Encourage the location of new multi-family housing development to occur in proximity to transit stations, along some transit corridors, and within some high activity areas with adequate transitions and buffers between higher-density developments and surrounding lower-density residential neighborhoods.	Consistent. As discussed in Section IV.I, Transportation/Traffic, of this Draft EIR, the Project Site is located in an area well-served by public transit provided by Metro and LADOT DASH. The Project Site is also located in a HQTa per the 2012–2035 RTP/SCS. In addition, the Project would provide a distribution of various uses throughout an existing superblock that would encourage residents to walk to the proposed on-site restaurants and community-serving retail. The publicly-accessible open space areas proposed by the Project would also promote walkability in the vicinity of the Project Site. Further, the Project would provide bicycle parking spaces for Project residents and visitors in accordance with LAMC requirements. The design of the Project would provide transitional zoning, stepped. The existing transit is an unwalkable distance from the proposed project with transit corridors inaccessible.

Table IV.F-1 (Continued)  
Project Consistency with Applicable Objectives and Policies in the General Plan Framework

Objective/Policy	Analysis of Project Consistency
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	heights, and buffers between the Project buildings and the adjacent single-family residential uses along Calhoun Avenue. The Project would also complement the existing Westfield Fashion Center located directly to the east of the Project Site, across Hazeltine Avenue. <b>The density and style is completely incompatible with the existing neighborhood. It is not a complement to the single family structures but rather a full on assault over taking the charm and quietness of the area.</b>
Objective 4.3: Conserve scale and character of residential neighborhoods.	Consistent. See Policy 3.2.4.
Urban Form and Neighborhood Design Chapter	
Goal 5A: A livable City for existing and future residents and one that is attractive to future investment. A City of interconnected, diverse neighborhoods that builds on the strengths of those neighborhoods and functions at both the neighborhood and Citywide scales.	Consistent. The Project would support this City goal by providing a new mixed-use development that would activate the existing site of the Sunkist Building while maintaining and rehabilitating the existing Sunkist Building. In addition, the proposed residential and neighborhood-serving commercial uses would be consistent and compatible with the mix of residential, retail, and office land uses surrounding the Project Site. The proposed residential and neighborhood-serving commercial uses would serve the surrounding community and future businesses while the Sunkist Building would provide employment opportunities for the community. <b>This project will saddle the city with unmitagatable traffic problems. It will run other already existing businesses out of the area.</b>
Objective 5.9: Encourage proper design and effective use of the built environment to help increase personal safety at all times of the day.	Consistent. The Project would incorporate elements that would promote individual and community safety. Specifically, as provided in Section IV.H.1, Public Services—Police Protection, of this Draft EIR, the Project would include private on-site security; a closed circuit camera system; keycard entry for the residential buildings and the residential parking areas; limited hours of operation for the publicly accessible ground floor areas; sufficient lighting of building entries and walkways to provide for pedestrian orientation and clearly identify a secure route between parking areas and points of entry into buildings; and sufficient lighting of parking areas to maximize visibility and reduce areas of concealment. <b>The proposed density of people will create a higher crime zone and require more community policing resources which do not and are not anticipated to exist in the future.</b>
Open Space and Conservation Chapter	

Policy 6.3.3: Utilize development standards to promote development of public open space that is visible, thereby helping to keep such spaces and facilities as safe as possible.	Consistent. Currently the Project Site provides no publically accessible open space and is completely reserved as private property. As previously described, approximately 107,793 square feet of the total common open space area proposed as part of the Project would be publicly accessible. The new public open space areas would include landscaped entry plazas, planting areas with seatwalls, planted parkways, landscaped plazas, and an expansive lawn, which would be publicly accessible. In addition, a publicly accessible 28,000-square-foot River Greenway located along the southern portion of the Project Site would be provided. The Project would incorporate elements that would promote
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Page IV.F-27

IV.F Land Use and Planning

Table IV.F-1 (Continued)  
Project Consistency with Applicable Objectives and Policies in the General Plan Framework

Objective/Policy	Analysis of Project Consistency
	individual and community safety, including sufficient lighting of walkways, a closed circuit camera system, and limited hours of operation for the publicly accessible ground floor areas. <b>The open space proposed are largely in accesble to the public. This project will destroy a huge swath of existing open space with is currently a great asset to the comminuty.</b>
Policy 6.4.8: Maximize the use of existing public open space resources at the neighborhood scale and seek new opportunities for private development to enhance the open space resources of the neighborhoods.	Consistent. See Policy 6.3.3.
Economic Development Chapter	
Objective 7.2: Establish a balance of land uses that provides for commercial and industrial development which meets the needs of local residents, sustains economic growth, and assures maximum feasible environmental quality.	Consistent. The Project would support this objective by providing a diverse mix of complementary uses at the Project Site, including the development of 298 new residential units and approximately 39,241 square feet of neighborhood-serving commercial uses while preserving and rehabilitating the existing Sunkist Building. The proposed commercial uses would complement and enhance the employment base of the Community Plan area, meet the needs of local residents, and foster continued economic investment. In addition, the Sunkist Building would continue to provide office space within the Project Site and would be rehabilitated as Class A office space to attract businesses and provide desirable employment opportunities in the surrounding area.
Policy 7.2.3: Encourage new commercial development in proximity to rail and bus transit corridors and stations.	Consistent. See Objective 3.4.



Policy 7.2.5: Promote and encourage the development of retail facilities appropriate to serve the shopping needs of the local population when planning new residential neighborhoods or major residential developments.	Consistent. Along with the proposed residential uses, the Project would include the development of new neighborhood-serving commercial uses within the Project Site that would serve residents, visitors, and businesses within the Project Site and in the surrounding area. <b>The retail facilities being proposed are a duplicate of those in existence at the Fashion Square mall now and as planned in the near future.</b>
Objective 7.6: Maintain a viable retail base in the city to address changing resident and business shopping needs.	Consistent. See Policy 7.2.5. <b>The retail facilities being proposed are a duplicate of those in existence at the Fashion Square mall now and as planned in the near</b>
Policy 7.6.3: Facilitate the inclusion of shopping facilities in mixed-use developments that serve the needs of local residents and workers. If necessary, consider utilizing financing techniques such as land write-downs and density bonuses.	Consistent. See Policy 7.2.5.
Transportation Element Chapter	
Objective 2: Mitigate the impacts of traffic growth, reduce congestion and improve air quality by implementing a comprehensive program of multi-modal strategies that	Consistent. As discussed in Section IV.I, Transportation/Traffic, of this Draft EIR, traffic impacts resulting from the Project would be mitigated to the extent feasible by a combination of physical

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IV.F Land Use and Planning

Table IV.F-1 (Continued)  
Project Consistency with Applicable Objectives and Policies in the General Plan Framework

Objective/Policy	Analysis of Project Consistency
encourages physical and operational improvements as well as demand management.	improvements and implementation of a Transportation Demand Management Program, as required by Mitigation Measure I-2. The Transportation Demand Management Program would include strategies to promote non-auto travel, reduce the use of single-occupant vehicle trips, and encourage employees to also live on-site. <b>There are no strategies to give the lower wage service employess of the new businesses to be able to afford these high price small units. The proposed mitigations will not solve the already existing traffic problems in the area. The Traffic study is flawed and therefore mitigations are insufficient.</b>

Policy 2.11: Continue and expand requirements for new development to include bicycle storage and parking facilities, where appropriate.	Consistent. As described in Section II, Project Description, of this Draft EIR, the Project would provide bicycle parking for residents and visitors in accordance with LAMC requirements and bicycle storage would be available within the parking level of each proposed building.
Policy 4.1: Seek to eliminate or minimize the intrusion of traffic generated by new regional or local development into residential neighborhoods while preserving an adequate collector street system.	Consistent. Access to the Project Site would continue to be provided via Riverside Drive and Hazeltine Avenue. Once onsite, access to parking would be provided via internal driveways. Access to the loading areas for deliveries would be provided by Hazeltine Avenue. As discussed in Section IV.I, Transportation/Traffic, of this Draft EIR, the Project would not exceed the significant impact criteria established by LADOT along any of the analyzed residential street segments and impacts regarding neighborhood intrusion would be less than significant. <b>894 new residents and approx. 50,000 sqft of commercial retail will undeniably affect traffic. Parking will overflow into neighborhoods and sacrifice the quality of life of existing residents.</b>
Mobility Plan 2035	
Policy 1.6: Design detour facilities to provide safe passage for all modes of travel during times of construction.	Consistent. As discussed in Section IV.I, Transportation/Traffic, of this Draft EIR, the Project would prepare and implement a Construction Management Plan, as required by Mitigation Measure I-1, which would formalize how construction would be carried out and identify specific actions that would be required to reduce effects on the surrounding community. The Construction Management Plan would incorporate safety measures around the construction site to reduce the risk to pedestrian traffic near the work area; minimize the potential conflicts between construction activities, street traffic, transit stops, and pedestrians; and reduce the use of residential streets and congestion to public streets and highways.
Policy 2.3: Recognize walking as a component of every trip, and ensure high quality pedestrian access in all site planning and public right-of-way modifications to provide a safe and comfortable walking environment.	Consistent. The Project would provide a distribution of various uses throughout an existing superblock that would encourage residents and employees to walk to on-site restaurants and community-serving retail. The Project Site is also located in a High Quality Transit Area as designated by the 2012–2035 RTP/SCS. Further, as discussed in Section IV.I, Transportation/Traffic, of this Draft EIR, the Project Site would be located in an area well-served by public transit provided by Metro and LADOT DASH. In addition, the publicly-accessible open

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Table IV.F-1 (Continued)  
Project Consistency with Applicable Objectives and Policies in the General Plan Framework

Objective/Policy	Analysis of Project Consistency
	space areas proposed by the Project would promote walkability in the vicinity of the Project Site.

Policy 2.6: Provide safe, convenient, and comfortable local and regional bicycling facilities for people of all types and abilities.	Consistent. As discussed in Section IV.I, Transportation/Traffic, of this Draft EIR, the Project would maintain the existing bicycle facilities located along Riverside Drive and Woodman Avenue and provide a direct and safe path of travel with minimal obstructions for pedestrian movement within and adjacent to the Project Site. The Project would also facilitate bicycle use by providing bicycle parking spaces and amenities within the Project Site.
Policy 2.17: Carefully consider the overall implications (costs, character, safety, travel, infrastructure, environment) of widening a street before requiring the widening, even when the existing right of way does not include a curb and gutter or the resulting roadway would be less than the standard dimension.	Consistent. As discussed in Section IV.I, Transportation/Traffic, of this Draft EIR, the Project would include Mitigation Measures I-3 and I-4, which would require widening of Riverside Drive. As part of the Traffic Study prepared for the Project, the Project Applicant consulted with LADOT and LADOT reviewed and approved the Traffic Study, including the proposed mitigation measures, prior to circulation of this Draft EIR. A copy of LADOT's Assessment Letter is included as Appendix G of this Draft EIR. <b>The street cannot be widened in any way. Any addition of lanes will be a compression of existing roads. This creates more density and traffic impacts on an already failing traffic pattern.</b>
Policy 3.2: Accommodate the needs of people with disabilities when modifying or installing infrastructure in the public right-of-way.	Consistent. The Project would be designed to provide accessibility and accommodate the needs of people with disabilities as required by the American with Disabilities Act (ADA) and the City.
Policy 3.3: Promote equitable land use decisions that result in fewer vehicle trips by providing greater proximity and access to jobs, destinations, and other neighborhood services.	Consistent. The Project would promote this policy by providing a new mixed-use development consisting of multi-family residential and neighborhood-serving commercial uses within one site and in close proximity to jobs (including those that may be offered on-site), destinations, and other neighborhood services. <b>The anticipated 125 jobs will not mitigate the proposed almost 900 new residents. The anticipated jobs will not accomodate the rents that are being proposed</b>
Policy 3.4: Provide all residents, workers and visitors with affordable, efficient, convenient, and attractive transit services.	Consistent. The Project would be located in an area well-served by public transit provided by Metro and LADOT, including bus stops along Riverside Drive and Hazeltine Avenue. <b>The area is not well served.</b>
Policy 3.8: Provide bicyclists with convenient, secure and well maintained bicycle parking facilities.	Consistent. As described in Section II, Project Description, of this Draft EIR, the Project would provide bicycle parking for residents and visitors in accordance with LAMC requirements and bicycle storage would be available within the parking level of each proposed building.
Policy 3.9: Discourage the vacation of public rights-of-way	Consistent. The Project would not include the of public rights-of-ways and public rights-of-way surrounding the Project Site would be maintained as part of the Project.
Policy 3.10: Discourage the use of cul-de-sacs that do not provide access for active transportation options.	Consistent. The Project would not include the development of a cul-de-sac.

Table IV.F-1 (Continued)  
 Project Consistency with Applicable Objectives and Policies in the General Plan Framework

Objective/Policy	Analysis of Project Consistency
Policy 4.8: Encourage greater utilization of Transportation Demand Management (TDM) strategies to reduce dependence on single-occupancy vehicles.	Consistent. As discussed in Section IV.I, Transportation/Traffic, of this Draft EIR, as part of Mitigation Measure I-2, the Project Applicant would provide for the development and implementation of a Transportation Demand Management, which would include strategies to promote non-auto travel and reduce the use of single-occupant vehicle trips.
Policy 5.2: Support ways to reduce vehicle miles traveled (VMT) per capita.	Consistent. The Project would provide a distribution of various uses throughout an existing superblock that would encourage residents and employees to walk to on-site restaurants and community-serving retail. The Project Site is also located in a High Quality Transit Area as designated by the 2012–2035 RTP/SCS. Further, as discussed in Section IV.I, Transportation/Traffic, of this Draft EIR, the Project Site would be located in an area well-served by public transit provided by Metro and LADOT DASH. In addition, the publicly-accessible open space areas proposed by the Project would promote walkability in the vicinity of the Project Site. The Project would also provide bicycle parking spaces in accordance with LAMC requirements for Project residents and visitors. <b>This superblock does not allow for residents to work on site. The added jobs will not support the rents that are going to be charged.</b>
Policy 5.5: Maximize opportunities to capture and infiltrate stormwater within the City's public right-of-ways	Consistent. During operation, the Project would include BMPs to collect, detain, treat, and discharge runoff on-site before discharging into the municipal storm drain system as part of the Low Impact Development Ordinance. Thus, with the implementation of the BMPs and site design approaches, the Project would reduce runoff from entering the wastewater system and would maximize opportunities to capture and infiltrate stormwater.
Infrastructure and Public Services Chapter	

<p>Policy 9.3.1: Reduce the amount of hazardous substances and the total amount of flow entering the wastewater system.</p>	<p>Consistent. As evaluated in Section IV.E, Hydrology and Water Quality, of this Draft EIR, and in the Initial Study, included as Appendix A of this Draft EIR, during Project construction, the Project would implement a Stormwater Pollution Prevention Plan (SWPPP) as required under the National Pollutant Discharge Elimination System (NPDES) General Construction Permit (Order No. 99-08-DWQ). The Project would implement Best Management Practices (BMPs) and other erosion control measures to minimize the discharge of pollutants in storm water runoff. In addition, during operation, the Project would include BMPs to collect, detain, treat, and discharge runoff on-site before discharging into the municipal storm drain system as part of the Low Impact Development Ordinance. Thus, with the implementation of the BMPs and site design approaches, the Project would reduce runoff from</p>
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Table IV.F-1 (Continued)

Objective/Policy	Analysis of Project Consistency
	entering the wastewater system.
Objective 9.6: Pursue effective and efficient approaches to reducing stormwater runoff and protecting water quality.	Consistent. As evaluated in Section IV.E, Hydrology and Water Quality, of this Draft EIR, and in the Initial Study, included as Appendix A of this Draft EIR, the Project would manage post-construction stormwater runoff with the implementation of BMPs as required by the Low Impact Development Ordinance to collect, detain, treat, and discharge runoff on-site before discharging into the municipal storm drain system. The implementation of the Project's BMPs and site design would result in an improvement in surface water quality runoff from the Project Site. In addition, the Project would not increase the percentage of impervious surface area on the Project Site.
Objective 9.10: Ensure that water supply, storage, and delivery systems are adequate to support planned development.	Consistent. Water service is provided to the Project Site via LADWP water lines. As evaluated in Section IV.J, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR, based on LADWP's demand projections provided in its 2010 Urban Water Management Plan, LADWP would be able to meet the water demand of the Project as well as the existing and planned future water demands of its service area. Furthermore, the Project would not exceed the available capacity within the distribution infrastructure that would serve the Project Site.

Project Consistency with Applicable Objectives and Policies in the General Plan Framework

City of Los Angeles  
SCH No. 2014071001

ICON Sherman Oaks  
July 2016

Page IV.F-32

Source: Eyestone Environmental, 2016.

#### Page IV.F-5 General Plan Use

This chart shows that nowhere in the immediate area is there another high density project other than the already existing Fashion Square Mall which is effectively shielded from the neighborhoods. This is a conversion of the neighborhood to a different incompatible use.

I) Transportation/Traffic IV.I-1

## b. Existing Conditions Intersection Levels of Service

Intersection turning movement counts for the 14 study intersections were collected in January 2015 during the typical weekday morning (7:00 A.M. to 10:00 A.M.) and afternoon (3:00 P.M. to 6:00 P.M.) commuter peak periods. The traffic counts were conducted during typical weekdays while there were no holidays, no rain, and schools were in session.

Part I Traffic/Transportation The very basis of this whole study proves that it is flawed. This project is located adjacent to the Regional Sherman Oaks Fashion Square Mall Bordered by Hazeltine on the East side of subject and sharing the thoroughfare Riverside Drive.

-Living adjacent to the mall it is easy for anyone to observe that during the year the mall has busy periods. Further proof of this is the need for the mall to employ traffic officers on Riverside Drive and Hazeltine to control the flow. By ignoring this fact the very methodology of this report is inaccurate and flawed.

-The busy periods are:

-Valentines Day, the before February 14

-Mothers Day, Second Sunday in May, a week before

-Memorial Day, Last weekend of May, The week surrounding the holiday for Numerous Sales

-Fathers day, 3<sup>rd</sup> Sunday of June, the week before

-4<sup>th</sup> of July, The holiday Week, Numerous Sales

-Labor day, First Monday in September, The week surrounding for Numerous Sales

-Halloween, October 31, Mall hosts special performance events

-Thanksgiving, November 4<sup>th</sup> Thursday, From the first Week November

-Christmas, December 25, Entire Month of December

This amounts to somewhere between 3-4 months of heavy traffic. None of these time periods were included in the study. This extra traffic load is not an anomaly and covers at least 25% of the year. For accurate results current traffic should be measured during one of these times.

During the scoping phase many (which are included in the Appendix) neighbors requested that the traffic study include a time period which accurately represents the traffic situation. Clearly these requests were not heeded.

The traffic problems around the Fashion Square Mall and Particularly the Hazeltine and Riverside intersection of Trader Joes and the proposed project are well known. If IMT is allowed to build this project as proposed with the limited mitigation outlined the problems will get much worse. The city will be responsible forever with this dysfunctional and failing situation. A proper study should require more effective Study and mitigations as a condition of approval and construction.

**\*\*The DEIR needs to do an effective traffic study that encompasses some of these periods and on weekends. These are the times that will be most impacted by the project. The interesections and transit cooridors are failing much of the time. It is not a typical traffic pattern due to the existence of the Fashion Square Mall.**

Allowances have been made for onsite parking. There is no discussion about unavoidable parking overflow into the closeby neighborhoods. The report mentions that there will be secured parking for the residents. This will reduce the number of publicly available space from the 1,345 total spaces. When asked if the "public" spaces will be charged the developer was elusive and unwilling to answer the question. As with every residential and retail building if parking is not easy and convenient then it will create extensive problems for neighbors finding parking for themselves. This omission is a grievous oversight. These neighborhoods are between the VNSO Park, which frequently takes all available street parking as well as the Trader Joes Shopping center. This will undoubtably need future attention. It should be a condition of zoning changes that the facility provide FREE parking to the public in perpetuity.

**\*\*The DEIR should investigate the impact this project will have on nearby parking. This should include the necessary proposed traffic study during construction as well as once the project is complete that will be necessary to get a Prefeered Parking District to protect the neighbors quality of life**

## V. Alternatives V-1

A,B,C,D,F V-11 thru V-138

None of the alternatives are significantly less dense than the proposed project. The current status is 25% of the proposed density. A compromise somewhere between the currentThe usage and the massive proposed usage should be considered carefully.

## List of Appendices

### Appendix A Initial Study/NOP/Nop Comment Letters

Reading thru many of these comments it is clear that the DEIR does not cover or investigate many of the comments made at that time. In particular the timing and methodology of the traffic study.

### Appendix C Historical resource Assesment

The Historical value of the Sunkist Building is undeniable. Orange Groves and those who ran and owned them largely built the area. The Sunkist Building is a monument to not only the notable architecture of the time but also the foresight and power of the Orange. The current proposal is a slap in the face to displaying the integrity of this building. The DEIR does not accurately cover this importance.

#### C.2 Archaeological and Paleontological Service Letters

This area, along the LA River was frequented by Indigenous Indians. Artifacts have been found in the past. A careful survey of the area before it is further disturbed should be conducted.

## My Conclusion:

**This project is oversized and incompatible with the current nature of the existing neighborhood. It is an extreme departure from the current usages. There are many negative issues that will be exacerbated and created thru these proposed zoning changes and approval of this project. The developer is not taking responsibility for most of them and the city will be left trying to mitigate impossible problems FOREVER. Los Angeles City should not approve this project until many questions are answered, corrected and mitigated to the highest level possible. This Draft Environmental Impact Report is biased in great favor of the developer. It took over 2 years for uninterested out of the area professionals to craft this report. The citizens have been given only 60 days to review it. In this short time many flaws have been discovered. I request that the report is corrected addressing the concerns that I and many other citizens express in our responses. And then the citizens should be given a reasonable fraction of the time they take to review the report.**



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From: **Loren Thompson** <[bylorenct@gmail.com](mailto:bylorenct@gmail.com)>

Date: Mon, Sep 26, 2016 at 11:12 PM

Subject: DEIR - ICON sherman Oaks Project (Sunkist Building Expansion); Case Number: ENV-2014-1362-EIR

To: [SARAH.MOLINA-PEARSON@lacity.org](mailto:SARAH.MOLINA-PEARSON@lacity.org)

To: Ms. Sarah Molina-Pearson, City of Los Angeles, Department of City Planning, 200 North Spring Street, Room 750 Los Angeles, CA 90012, [213-473-9983](tel:213-473-9983)

Regarding: ICON Sherman Oaks Project (Sunkist Building Expansion); Case Number: ENV-2014-1362-EIR

From: Loren Thompson, 4817 Calhoun Avenue, Sherman Oaks, CA 91423 – [Blair4homes@gmail.com](mailto:Blair4homes@gmail.com)

Date: 9/23/2016

This was put together by my husband with me at his side. These words mirror my thought and huge concerns. PLEASE enter them into the record concerning the Draft Environmental Impact Report.

Thank you...

Loren Thompson

I have owned my home at 4817 Calhoun Avenue, Sherman Oaks for 16 years. My home is less than 500 feet from the proposed project. Before that I lived in the immediate neighborhood for 5 additional years. I am a licensed Real Estate Broker. I have earned my living for the past 24 years selling houses in the area. I have also flipped and developed several houses in the Fashion Square and surrounding areas. I am proud to say that the houses I have remodeled, rebuilt and expanded were all received by the neighbors as assets to the surrounding houses; fitting in with size, style and aesthetics.

Over the years I have been involved with Sherman Oaks Neighborhood Council as well as the Sherman Oaks Homeowners Association. I was president of the Parents Association of Sherman Oaks Elementary School for 2 years. My kids have been raised in this area and have enjoyed the nature of our neighborhood and the adjacent park.

I am clearly a long term resident with a vested interest and personal investment in the neighborhood and community. I am informed and want what is best for the community at large. The same cannot be said for the developers or the authors of this Draft Environmental Impact Report.

When notified about this development I had mixed feelings. It is clearly an underutilized piece of land. I knew that sooner or later it would be developed into something more productive. I only hoped that the owners would consider the neighborhood and realize that the highest and best use over the long term would be something that fits in.

During the scoping process I was horrified to realize the drastic changes the developers were proposing both in size and use. Multiple Significant Zoning Changes, Huge increases in Density, a complete divestiture of the current aesthetics, and a Massive increase in Traffic in the immediate and surrounding areas is proposed.

I mobilized my neighbors and we put together what I consider to be a sizable response to the Scoping and request for EIR. That is evidenced by the number of responses in the Appendix of the DEIR. Many of the letters were modified form letters that I wrote and distributed. I put together a grassroots campaign to address this myself during the scoping as well as once the DEIR was released.

Then I got the notice of the DEIR. I have been trying to address this for the past 50 days. As a citizen who has never addressed or even read an EIR before I am completely overwhelmed by it. This was drafted by a professional firm that does this day in and day out. To expect me to comprehend even on part of this report is absurd. The Executive Summary is over 200 pages not including tables, Charts, diagrams, pictures etc. The report is over 2000 pages long in size alone, the organization of the report is completely confusing with data and specific facts and finding buried in with generic boiler plate verbiage. In an attempt to rectify that I put together a seminar for the neighbors aimed at putting together responses that will be listened to. We had a very good showing of interested community considering a very short window of notice.

As I will try to outline in my response even I, unfamiliar as I am with these types of reports, have found numerous errors, overstatements and outright lies. I also take exception that many of the concerns raised in the scoping phase that were not addressed at all. It appears that the company performing the DEIR did not even read most of the comments that were made in the scoping not only dismissing them but ignoring them altogether.

I see many issues in the DEIR which will determine if this is indeed an asset to the community or one which will be a burden to the City for years to come. The DEIR failed in many ways to address the concerns of neighbors and I think they need to be corrected before this project can move any further forward.

This DEIR just like the proposed project is unworkable due to the pure Mass. The system of obtaining major zoning changes and city approval for massive projects is supposed to be accessible to a normal person. This report in its complexity and volume is impossible to read or understand much less put together a comprehensive response.

The developers have spent over 2 years and untold thousands and even hundreds of thousands of dollars putting together a report that gives the answers they want. They are well versed professionals. The public was given 60 days to review and respond to this Massive DEIR. At this point we must trust the city to work for the constituents and only grant CHANGES in zoning that are truly a benefit to the community. I wish I had the time to more thoroughly craft a complete response. I have a job, a family, and a house to maintain and support. I don't have the ability to spend this kind of time.

Thank you for your consideration.

Sincerely,

Blair Thompson

## II Project Description II-1

3) pg II-3 – The existing building is 57 feet tall. But the report fails to address the fact that it sits upon a raised earthen platform. This is not addressed in regards to where the additional project will be situated. The 75 feet of the new 4-5 story buildings will surely dwarf the exiting architecture.

**\*\*the DEIR must more clearly depict the placement and elevations of the proposed buildings in relation to surrounding buildings**

c.) Page II-21 FAR and Setbacks

The project as proposed, with the changing zoning allows for much closer setbacks than the building currently has. On Riverside Drive it is proposed to reduce to 10' setback from the street and on Hazeltine as little as 5' setback from the street. Currently the building is set way back from the street with surface parking lot and extensive landscaping. None of the surrounding buildings is this close to the street. The Fashion Square Building varies but ranges from 16-20 feet setbacks with a great variety of Elevations as well as significant mature landscaping.

The proposed project is a drastic change from the current building. As well it is extremely different from the neighboring buildings. The Fashion Square Mall on Riverside drive has a large open space on the corner of Hazeltine and Riverside. It has large mature trees and thick landscaping. The building itself is set back from the street at minimum 20' as much as 30' and is filled with thick, mature landscaping. The building itself has multiple elevations.

To the west on both sides of the street the buildings which are a mix of smaller and medium sized apartments as well as single family residences and duplex/triplexes, are set well back from the street with a minimum of 15-20'. The only nearby building that is as close as the proposed project is Trader Joes shopping center which is comprised of single family buildings only.

It seems that no concern was paid to PREVALIING Setbacks or compatability with the surroundings. The shere mas and closeness of this project should be minimized to be somewhat closer to the current building as well as in harmony with other buidlings.

**\*\*The DEIR should outline surrounding building setacks with more information about their height and contours. With this information an analysis should be performed to determine the proposed projects compatibility with the neighborhood**

8) Necessary Approvals page 11-27

With the detailed planning they seem to be making this vague statement needs to be clarified.

“Other discretionary and ministerial permits and approvals that may be deemed

necessary, including but not limited to, temporary street closure permits, grading

permits, excavation permits, foundation permits, and building permits.

**\*\*The DEIR should clearly outline what the developers are asking for.**

### III Environmental Setting III-1

#### A) Overview of Environmental Setting III-1 (alsoIV.D Cultural Resources)

a. Concern was paid to the Architecture of the actual building but the writers of this report prove that they are completely missing the point of this architecture. The concrete reversed step design of the building is important, But INTEGRAL to this design is the open space and the mature trees surrounding the site. These provide a stark contrast to the harsh lines of the building architecture. It is also homage to the idea that Sunkist, an agricultural company, was headquartered here. This was surely a consideration of the design of the Architect. Otherwise the building would have place in the center of the lot or towards the front to enhance the view of the building. This shielding is clearly necessary for the integrity of the building to be maintained.

The design of the new project clearly had no concern for this. They mention site channels as being able to see the Current Architectural Asset of the Sunkist Building. There is only 1 driveway that will afford any kind of view and this has very little peripheral access due to the extreme long driveway. The Draft Environmental Impact Report uses deceptively chosen renderings to give the impression that there will be some way to see the architecture. The main rendering they give shows the building from an almost birds eye view that only a Drone will be able to achieve. Even in this rendering it looks like the 4 stories of the current Building will appear above the new 5+ story buildings.

**\*\*The Draft Environmental Report should be required to use more accurate and honest street level views to depict whatever vestiges of a view of the Sunkist Building architecture there will be left.**

#### B) Related Projects Page III-5

Table III-1 Related Projects

This table does not clearly identify current and proposed projects in their intent or size. Also, I know that this is not a comprehensive list. IE, On Magnolia just West of Hazeltine there is a large apartment building in similar planning stages at the Horace Heidt Property. This incredibly pertinent omission calls into question the integrity of the whole report

**\*\*The DEIR must re-examine other related projects and their Impact on the Community. The cumulative affect of this much building is of great concern but was barely considered.**

#### IV Environmental Impact Analysis

##### A) Aesthetics IV.A-1

The surrounding buildings are largely 50's 60's and 70's construction which are compatible with sub-urban living styles. Buildings constructed since then have largely followed this lead in order to fit in. The proposed project is clearly a Modernistic 2016 style with harsh lines, extreme mass, and an Imposing Stance on the lot. The Mall is constructed with painted bricks, stucco and mostly shielded by dense vegetation. Other buildings have been designed with either greater setbacks, lower heights or a construction style that makes them blend into the quaint, charming community.

**\*\*The DEIR needs to do more to investigate if this project is compatible with the visual style of its surroundings or if it will stick out like a sore thumb.**

Thruout the report the authors discount any view factor. In fact, the very existence of the open space, the mature trees, the large surface parking lot and grove type planting of trees is in itself a VEIW that should be considered.

**\*\*The DEIR needs to consider the actual view of the Sunkist Building and surrounding as a positive factor that should be mitigated in the design of this new project**

##### Cultural Resources IV.D-1

The project does little to add to the culture of the Neighborhood, Community of the City of LA. Unless you consider yet another Strip mall, and overpriced apartments. There does not seem to be a great need for High End Luxury Apartments. At least none has been demonstrated in this DEIR

**\*\*The DEIR should investigate how the project could be an asset to the community by adding retail that is lacking or educational, provide real accessible open space or even provide Affordable housing to some of the people who provide the area services.**

##### F) Land Use and Planning IV.F-1

Table IV.F-1

Project Consistency with Applicable Objectives and Policies in the General Plan Framework

Objective/Policy	Analysis of Project Consistency
Land Use Chapter	
<p>Objective 3.1: Accommodate a diversity of uses that support the needs of the City's existing and future residents, businesses, and visitors.</p>	<p>Consistent. The Project would contribute to the achievement of this objective by introducing a mix of complementary uses at the Project Site, including the development of 298 new residential units and approximately 39,241 square feet of neighborhood-serving commercial uses, including up to 7,241 square feet of restaurant uses, which would serve the community and future businesses. In addition, an approximately 28,000-square-foot (0.64-acre) publically accessible plaza area, referred to as the River Greenway, within the southern portion of the Project Site would provide access to the LA Riverwalk. The Project would also preserve and rehabilitate the existing Sunkist Building within the overall campus-like setting. <b>The proposed project will do little to enhance the lives of the community. The retail establishments in the area are well served by LOCALLY owned small establishments as well as those in the adjacent mall. The housing is high cost luxury singles with no accomatations for those who serve the community with lower paying service jobs. The open space will not be available to the general public.</b></p>
<p>Policy 3.1.2: Allow for the provision of sufficient public infrastructure and services to support the projected needs of the City's population and businesses within the patterns of use established in the community plans as guided by the Framework Citywide Long-Range Land Use Diagram.</p>	<p>Consistent. As discussed in Section IV.H, Public Services, Section IV.J, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR, and the Initial Study included in Appendix A of this Draft EIR, agencies providing public services and utilities to the Project Site would have adequate capacity to serve the Project. <b>The area is already underserved in the area of public services. Nearby Fashion Square neighborhood residents have take the measure of hiring a private security firm to fill needs that LAPD cannot fulfill. No provision is made by the ICON project to assist in the underfunded and stressed LAPD, LAFD and all other public services.</b></p>
<p>Policy 3.1.3: Identify area for the establishment of new open space opportunities to serve the needs of existing and future residents. These opportunities may include a citywide linear network of parkland sand trails, neighborhood parks, and urban open spaces.</p>	<p>Consistent. The Project would provide a variety of open space and recreational amenities available to Project residents and guests, including lobbies, a lounge, fitness center, recreation room, pool and spa, and rooftop gardens and courtyards. The Project would include approximately 191,991 square feet (4.41 acres) of common open space areas, of which approximately 60,490 square feet would be landscaped. Approximately 107,793 square feet of the total common open space area would be publicly accessible. In addition, approximately 13,150 square feet of private open space would be provided. The new public open space areas would include landscaped entry plazas, planting areas with seatwalls, planted parkways, landscaped plazas, and an expansive lawn, which would be publicly accessible. A publicly accessible 28,000-square-foot River Greenway located along the southern portion of</p>

	<p>the Project Site would also increase publicly accessible open space on private property within the Van Nuys-North Sherman Oaks Community Plan area, provide access to the Los Angeles Riverwalk,</p> <p>The open spaces mentioned are mostly hidden from public view, 70,000 + on rooftop decks, much behind locked doors, and a smaller area near the LA River, which is completely underneath the overpass of the 101 freeway. This area is exceptionally noisy, dark and by most standards will have Impared and unhealthy air quality. and revitalize this portion of the Los Angeles River.</p>
Objective 3.2: Provide for the spatial distribution of development that promotes an improved quality of life by facilitating a reduction of vehicle trips, vehicle miles traveled, and air	<p>Consistent. The Project would provide a distribution of various uses throughout an existing superblock that would encourage residents and employees to walk to on-site restaurants and community-serving retail. The Project Site is also located in a High Quality Transit Area</p> <p>Socalled superblock will create an exceptional increase in traffic which cannot be mitigated. As is consistent with this area of the city the hoped for switch to alternate methods of transportation is unlikely to come to fruition. This may increase the quality of life for those living in this NEW development but it will not improve the quality of life of the current neighbors in any way.</p>

#### IV.F Land Use and Planning

Table IV.F-1 (Continued)  
Project Consistency with Applicable Objectives and Policies in the General Plan Framework

Objective/Policy	Analysis of Project Consistency
pollution.	as designated by the 2012–2035 RTP/SCS. Further, as discussed in Section IV.I, Transportation/Traffic, of this Draft EIR, the Project Site would be located in an area well-served by public transit provided by Metro and LADOT DASH. In addition, the publicly-accessible open space areas proposed by the Project would promote walkability in the vicinity of the Project Site. The Project would also provide bicycle parking spaces in accordance with LAMC requirements for Project residents and visitors. Therefore, the Project would provide opportunities for the use of alternative modes of transportation, including convenient access to public transit and opportunities for walking and biking thereby, facilitating a reduction in vehicle miles traveled and related air pollution.
Policy 3.2.3: Provide for the development of land use patterns that emphasize pedestrian/bicycle access and use in appropriate locations.	Consistent. See Objective 3.2.
Policy 3.2.4: Provide for the siting and design of new development that maintains the prevailing scale and character of the City's stable residential neighborhoods and enhances the character of commercial and industrial districts.	Consistent. The Project would construct three new buildings that would provide for new residential and neighborhood-serving commercial uses within the Project Site. The proposed buildings would reach a maximum height of 75 feet, consistent with the existing 1L Height District. The Project would provide similar land uses as the surrounding area and would be appropriately scaled and compatible with the surrounding multi-family and single-family neighborhoods and commercial character. Specifically, the proposed buildings along the eastern portion of the Project Site would be similar in height to the adjacent Westfield Fashion Center's Bloomingdale's building located east of the Project Site. In addition, the proposed parking structure, which would be approximately 50 feet in height and constructed east of the Sunkist Building, would be lower than the existing Sunkist Building. Building B located at the corner of Riverside Drive and Calhoun Avenue would be approximately 60 feet in height and would provide a transition from the Westfield Fashion Square and the 75-foot-tall Building A located along Riverside Drive to the east. Building C, which would front the one-story single-family homes along Calhoun Avenue, would be the Project's lowest scale building and would be stepped down facing the residences across Calhoun Avenue to provide a transitional buffer from the uses across Calhoun Avenue. Thus, the Project would maintain the prevailing scale and character of the City's stable residential neighborhoods and enhance the character of commercial and industrial districts. <b>The proposed project is not in any way compatible with the neighborhood or the current use or building. The density planned exists nowhere else in proximity to the subject. The setbacks are inconsistent, the height is inconsistent, the number of units in an area is inconsistent, the aesthetics are inconsistent.</b>

Table IV.F-1 (Continued)

Project Consistency with Applicable Objectives and Policies in the General Plan Framework

Objective/Policy	Analysis of Project Consistency
<p>Objective 3.3: Accommodate projected population and employment growth within the City and each community plan area and plan for the provision of adequate supporting transportation and utility infrastructure and public services.</p>	<p>Consistent. As discussed in the Initial Study, which is included in Appendix A of this Draft EIR, the residential component of the Project would introduce approximately 894 new residents to the Project area. The Project's estimated 894 new residents would represent approximately 1.1 percent of the population growth forecasted by SCAG in the City of Los Angeles Subregion between 2014 and 2018. The Project would generate approximately 106 new jobs and would be within the employment growth forecasted by SCAG. Therefore, the Project's population and employment generation would be well within SCAG's projections for the Subregion, which serve as the basis for the General Plan Framework's projections. In addition, as discussed in Section IV.H, Public Services, and Section IV.J, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR, as well as the Initial Study included in Appendix A of this Draft EIR, the agencies and infrastructure that provide services and utilities to the Project Site would have capacity to serve the Project. If this project was at all accomodateing projected population growth it would have a wide range of availabilities includeing lower cost units for lower income residents, larger units for families, and ownership possibilities. This project has only one segment of the anticipated population growth accomadted, that which will make the developers the most money.</p>
<p>Objective 3.4: Encourage new multi-family residential, retail commercial, and office development in the City's neighborhood districts, community, regional, and downtown centers as well as along primary transit corridors/ boulevards, while at the same time conserving existing neighborhoods and related districts.</p>	<p>Consistent. The Project would introduce new residential and neighborhood-serving commercial uses to the Project Site, which is located along Riverside Drive. In addition, the Project would preserve and rehabilitate the existing Sunkist Building on-site. Riverside Drive is a designated an Avenue I in the Mobility Plan 2035. Riverside Drive is a primary transit corridor with several Metro bus lines and bus stops located in the vicinity of the Project Site. The Project Site is also located in a High Quality Transit Area as designated by the 2012–2035 RTP/SCS. Further, the proposed uses would be provided within the boundaries of the existing Project Site and would be compatible with the surrounding multi-family residential neighborhoods and commercial uses in the vicinity of the Project Site.</p>



Policy 3.4.1: Conserve existing stable residential neighborhoods and lower-intensity commercial districts and encourage the majority of new commercial and mixed-use (integrated commercial and residential) development to be located (a) in a network of neighborhood districts, community, regional, and downtown centers, (b) in proximity to rail and bus transit stations and corridors, and (c) along the City's major boulevards, referred to as districts, centers, and mixed-use boulevards, in accordance with the Framework Long-Range Land Use Diagram.	Consistent. See Objective 3.2 and Policy 3.2.4. <b>This I already hurting the existing neighborhoods. The mere disclosure of this impending project and population growth is destabilizing the value and quality of the housing stock.</b>
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#### IV.F Land Use and Planning

Table IV.F-1 (Continued)  
Project Consistency with Applicable Objectives and Policies in the General Plan Framework

Objective/Policy	Analysis of Project Consistency
Objective 3.7: Provide for the stability and enhancement of multi-family residential neighborhoods and allow for growth in areas where there is sufficient public infrastructure and services and the residents' quality of life can be maintained or improved.	Consistent. See Objective 3.2, Policy 3.1.2, and Policy 3.2.4.
Policy 3.7.1: Accommodate the development of multi-family residential units in areas designated in the community plans in accordance with Table 3-1 and Zoning Ordinance densities indicated in Table 3-3, with the density permitted for each parcel to be identified in the community plans.	Partially Consistent. As described in Section II, Project Description, of this Draft EIR, the land use designation of the Project Site is for Community Commercial land uses. In addition, the Project Site is currently zoned C2-1L-RIO (Commercial, Height District 1L, River Improvement Overlay District), PB-1L-RIO (Parking Building, Height District 1L, River Improvement Overlay District), and P-1L-RIO (Automobile Parking-Surface and Underground, Height District 1L, River Improvement Overlay District). The Commercial zones permit a wide array of land uses such as retail stores, offices, hotels, residential dwelling units and theaters. The PB-1L zone permits a parking building, including those attached to or integrated with buildings. The PB zone also permits any use permitted in the P (Automobile Parking Zone), which includes surface parking. The Project Site's existing Community Commercial land use designation and C2 zoning currently permits a residential density of one unit per 400 square feet of lot area. Thus, development of the portions of the Project Site currently zoned C2-1L would permit approximately 300 residential units. Based on the Community Plan's Land Use Map, the Community Commercial land use designation corresponds to the CR, C2, C4, RAS3 and RAS4 zones. Therefore, to establish

	consistency between the Project Site's current land use designation and zoning throughout the entire site, the Project includes a request for a Zone Change from PB-1L-RIO to C2-1L-RIO and PB-1L-RIO and PB-1L-RIO to RAS3-1L-RIO. In accordance with the existing Community Commercial land use designation, the Project proposes to preserve the existing Sunkist Building and develop 298 new multi-family residential units around the perimeter of the Project Site. Therefore, the Project would be consistent with the densities established in the General Plan Framework. <b>This project wants to bring the zoning into compliance with the Community Plan. There is nothing in the community plan that says a lower zoning should be brought up to the highest density and development allowable. These are not minor insignificant technical zone changes. They are extreme departures from the current allowable uses.</b>
Policy 3.7.4: Improve the quality of new multi-family dwelling units based on the standards in Chapter 5 Urban Form and Neighborhood Design Chapter of this Element.	Consistent. The Project would introduce a mixed-use development consisting of residential and neighborhood-serving commercial uses in an urbanized area that features a similar mix of land uses. In addition, the Project would provide a variety of open space and recreational amenities available to Project residents and guests, including lobbies, a lounge, fitness center, recreation room, pool and spa, and rooftop gardens and courtyards. The Project would also enhance the walkability of the area by

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#### IV.F Land Use and Planning

Table IV.F-1 (Continued)  
Project Consistency with Applicable Objectives and Policies in the General Plan Framework

Objective/Policy	Analysis of Project Consistency
	providing a publicly accessible 28,000-square-foot River Greenway located along the southern portion of the Project Site. In addition, as discussed in Section IV.A, Aesthetics, of this Draft EIR, the Project's design would employ elements to ensure compatibility with surrounding land uses, including building fenestration, variations in surface materials and colors, and tiered building heights. Further, the Project would incorporate elements that would promote individual and community safety, including proper lighting of building entries and walkways to provide for pedestrian orientation to clearly identify a secure route between parking areas and points of entry into buildings, and sufficient lighting of parking structures, elevators, and lobbies to reduce areas of concealment, at Project build-out. <b>The so called open areas are not open to the public. The project will not improve the neighborhood. The mix of unit sizes appeals to a largely Transient population. These</b>

	types of tenants will do little to help the community. As renters they do not have a vested interest in maintaining a valuable community standard.
Policy 3.10.4: Provide for the development of public streetscape improvements, where appropriate.	Consistent. The Project would install new street trees and perimeter landscaping along the Project Site's Riverside Drive and Hazeltine Avenue frontages that would enhance the streetscape environment and create and promote pedestrian activity along these street segments. Further, appropriate and contextual landscaping would be utilized along the edges of the Project Site to create green visual buffer zones from the neighboring building, thereby enhancing privacy. In order to build this project they will be destroying a beautiful stand of mature trees along 3 sides of the property. They will be building the structures much closer to the street than the current open landscaping. This project will be a significant downgrade from the current status and will be less appealing than other surrounding properties
Objective 3.18: Provide for the stability and enhancement of multi-family residential, mixed-use, and/or commercial areas of the City and direct growth to areas where sufficient public infrastructure and services exist.	Consistent. See Policy 3.1.2 and Policy 3.2.4. See response to See Policy 3.1.2 and Policy 3.2.4
Housing Chapter	
Objective 4.1: Plan the capacity for and develop incentives to encourage production of an adequate supply of housing units of various types within each subregion.	Consistent. The Project would support this objective through the development of 298 new multi-family residential units consisting of a variety of unit types. If this project was at all accomadateing projected population growth it would have a wide range of availabilities includeing lower cost units for lower income residents, larger units for families, and ownership possibilities. This project has only one segment of the anticipated population growth accomadated, that which will make the developers the most money.
Objective 4.2: Encourage the location of new multi-family housing development to occur in proximity to transit stations, along some transit corridors, and within some high activity areas with adequate transitions and buffers between higher-density developments and surrounding lower-density residential neighborhoods.	Consistent. As discussed in Section IV.I, Transportation/Traffic, of this Draft EIR, the Project Site is located in an area well-served by public transit provided by Metro and LADOT DASH. The Project Site is also located in a HQTAs per the 2012–2035 RTP/SCS. In addition, the Project would provide a distribution of various uses throughout an existing superblock that would encourage residents to walk to the proposed on-site restaurants and community-serving retail. The publicly-accessible open space areas proposed by the Project would also promote walkability in the vicinity of the Project Site. Further, the Project would provide bicycle parking spaces for Project residents and visitors in accordance with LAMC requirements. The design of the Project would provide transitional zoning, stepped  The existing transit is an unwalkable distance from the proposed project with transit corridors inaccessible.

Table IV.F-1 (Continued)

Project Consistency with Applicable Objectives and Policies in the General Plan Framework

Objective/Policy	Analysis of Project Consistency
	heights, and buffers between the Project buildings and the adjacent single-family residential uses along Calhoun Avenue. The Project would also complement the existing Westfield Fashion Center located directly to the east of the Project Site, across Hazeltine Avenue. <b>The density and style is completely incompatible with the existing neighborhood. It is not a complement to the single family structures but rather a full on assault over taking the charm and quietness of the area.</b>
Objective 4.3: Conserve scale and character of residential neighborhoods.	Consistent. See Policy 3.2.4.
Urban Form and Neighborhood Design Chapter	
Goal 5A: A livable City for existing and future residents and one that is attractive to future investment. A City of interconnected, diverse neighborhoods that builds on the strengths of those neighborhoods and functions at both the neighborhood and Citywide scales.	Consistent. The Project would support this City goal by providing a new mixed-use development that would activate the existing site of the Sunkist Building while maintaining and rehabilitating the existing Sunkist Building. In addition, the proposed residential and neighborhood-serving commercial uses would be consistent and compatible with the mix of residential, retail, and office land uses surrounding the Project Site. The proposed residential and neighborhood-serving commercial uses would serve the surrounding community and future businesses while the Sunkist Building would provide employment opportunities for the community. <b>This project will saddle the city with unmitagatable traffic problems. It will run other already existing businesses out of the area.</b>
Objective 5.9: Encourage proper design and effective use of the built environment to help increase personal safety at all times of the day.	Consistent. The Project would incorporate elements that would promote individual and community safety. Specifically, as provided in Section IV.H.1, Public Services—Police Protection, of this Draft EIR, the Project would include private on-site security; a closed circuit camera system; keycard entry for the residential buildings and the residential parking areas; limited hours of operation for the publicly accessible ground floor areas; sufficient lighting of building entries and walkways to provide for pedestrian orientation and clearly identify a secure route between parking areas and points of entry into buildings; and sufficient lighting of parking areas to maximize visibility and reduce areas of concealment. <b>The proposed density of people will create a higher crime zone and require more community policing resources which do not and are not anticipated to exist in the future.</b>
Open Space and Conservation Chapter	
Policy 6.3.3: Utilize development standards to promote development of public open space that is visible, thereby helping to keep such spaces and facilities as safe as possible.	Consistent. Currently the Project Site provides no publically accessible open space and is completely reserved as private property. As previously described, approximately 107,793 square feet of the total common open space area proposed as part of the Project would be publicly accessible. The new public open space

areas would include landscaped entry plazas, planting areas with seatwalls, planted parkways, landscaped plazas, and an expansive lawn, which would be publicly accessible. In addition, a publicly accessible 28,000-square-foot River Greenway located along the southern portion of the Project Site would be provided. The Project would incorporate elements that would promote

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#### IV.F Land Use and Planning

Table IV.F-1 (Continued)

Project Consistency with Applicable Objectives and Policies in the General Plan Framework

Objective/Policy	Analysis of Project Consistency
	individual and community safety, including sufficient lighting of walkways, a closed circuit camera system, and limited hours of operation for the publicly accessible ground floor areas. <b>The open space proposed are largely in accesble to the public. This project will destroy a huge swath of existing open space with is currently a great asset to the comminuty.</b>
Policy 6.4.8: Maximize the use of existing public open space resources at the neighborhood scale and seek new opportunities for private development to enhance the open space resources of the neighborhoods.	Consistent. See Policy 6.3.3.
<b>Economic Development Chapter</b>	
Objective 7.2: Establish a balance of land uses that provides for commercial and industrial development which meets the needs of local residents, sustains economic growth, and assures maximum feasible environmental quality.	Consistent. The Project would support this objective by providing a diverse mix of complementary uses at the Project Site, including the development of 298 new residential units and approximately 39,241 square feet of neighborhood-serving commercial uses while preserving and rehabilitating the existing Sunkist Building. The proposed commercial uses would complement and enhance the employment base of the Community Plan area, meet the needs of local residents, and foster continued economic investment. In addition, the Sunkist Building would continue to provide office space within the Project Site and would be rehabilitated as Class A office space to attract businesses and provide desirable employment opportunities in the surrounding area.
Policy 7.2.3: Encourage new commercial development in proximity to rail and bus transit corridors and stations.	Consistent. See Objective 3.4.
Policy 7.2.5: Promote and encourage the development of retail facilities appropriate to serve the shopping needs of the local population when planning new residential neighborhoods or major residential developments.	Consistent. Along with the proposed residential uses, the Project would include the development of new neighborhood-serving commercial uses within the Project Site that would serve residents, visitors, and businesses within the Project Site and in the surrounding

	area. The retail facilities being proposed are a duplicate of those in existence at the Fashion Square mall now and as planned in the near future.
Objective 7.6: Maintain a viable retail base in the city to address changing resident and business shopping needs.	Consistent. See Policy 7.2.5. The retail facilities being proposed are a duplicate of those in existence at the Fashion Square mall now and as planned in the near future.
Policy 7.6.3: Facilitate the inclusion of shopping facilities in mixed-use developments that serve the needs of local residents and workers. If necessary, consider utilizing financing techniques such as land write-downs and density bonuses.	Consistent. See Policy 7.2.5.
Transportation Element Chapter	
Objective 2: Mitigate the impacts of traffic growth, reduce congestion and improve air quality by implementing a comprehensive program of multi-modal strategies that	Consistent. As discussed in Section IV.I, Transportation/Traffic, of this Draft EIR, traffic impacts resulting from the Project would be mitigated to the extent feasible by a combination of physical

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#### IV.F Land Use and Planning

Table IV.F-1 (Continued)  
Project Consistency with Applicable Objectives and Policies in the General Plan Framework

Objective/Policy	Analysis of Project Consistency
encourages physical and operational improvements as well as demand management.	improvements and implementation of a Transportation Demand Management Program, as required by Mitigation Measure I-2. The Transportation Demand Management Program would include strategies to promote non-auto travel, reduce the use of single-occupant vehicle trips, and encourage employees to also live on-site. There are no strategies to give the lower wage service employess of the new businesses to be able to afford these high price small units. The proposed mitigations will not solve the already existing traffic problems in the area. The Traffic study is flawed and therefore mitigations are insufficient.
Policy 2.11: Continue and expand requirements for new development to include bicycle storage and parking facilities, where appropriate.	Consistent. As described in Section II, Project Description, of this Draft EIR, the Project would provide bicycle parking for residents and visitors in accordance with LAMC requirements and bicycle storage would be available within the parking level of each proposed building.
Policy 4.1: Seek to eliminate or minimize the intrusion of traffic generated by new regional or local development into residential neighborhoods while preserving an adequate collector street system.	Consistent. Access to the Project Site would continue to be provided via Riverside Drive and Hazeltine Avenue. Once onsite, access to parking would be provided via internal driveways. Access to the loading areas for deliveries would be provided by Hazeltine Avenue. As discussed in Section IV.I, Transportation/Traffic, of this Draft EIR, the Project



	would not exceed the significant impact criteria established by LADOT along any of the analyzed residential street segments and impacts regarding neighborhood intrusion would be less than significant. 894 new residents and approx. 50,000 sqft of commercial retail will undeniably affect traffic. Parking will overflow into neighborhoods and sacrifice the quality of life of existing residents.
Mobility Plan 2035	
Policy 1.6: Design detour facilities to provide safe passage for all modes of travel during times of construction.	Consistent. As discussed in Section IV.I, Transportation/Traffic, of this Draft EIR, the Project would prepare and implement a Construction Management Plan, as required by Mitigation Measure I-1, which would formalize how construction would be carried out and identify specific actions that would be required to reduce effects on the surrounding community. The Construction Management Plan would incorporate safety measures around the construction site to reduce the risk to pedestrian traffic near the work area; minimize the potential conflicts between construction activities, street traffic, transit stops, and pedestrians; and reduce the use of residential streets and congestion to public streets and highways.
Policy 2.3: Recognize walking as a component of every trip, and ensure high quality pedestrian access in all site planning and public right-of-way modifications to provide a safe and comfortable walking environment.	Consistent. The Project would provide a distribution of various uses throughout an existing superblock that would encourage residents and employees to walk to on-site restaurants and community-serving retail. The Project Site is also located in a High Quality Transit Area as designated by the 2012–2035 RTP/SCS. Further, as discussed in Section IV.I, Transportation/Traffic, of this Draft EIR, the Project Site would be located in an area well-served by public transit provided by Metro and LADOT DASH. In addition, the publicly-accessible open

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#### IV.F Land Use and Planning

Table IV.F-1 (Continued)

Project Consistency with Applicable Objectives and Policies in the General Plan Framework

Objective/Policy	Analysis of Project Consistency
	space areas proposed by the Project would promote walkability in the vicinity of the Project Site.
Policy 2.6: Provide safe, convenient, and comfortable local and regional bicycling facilities for people of all types and abilities.	Consistent. As discussed in Section IV.I, Transportation/Traffic, of this Draft EIR, the Project would maintain the existing bicycle facilities located along Riverside Drive and Woodman Avenue and provide a direct

	and safe path of travel with minimal obstructions for pedestrian movement within and adjacent to the Project Site. The Project would also facilitate bicycle use by providing bicycle parking spaces and amenities within the Project Site.
Policy 2.17: Carefully consider the overall implications (costs, character, safety, travel, infrastructure, environment) of widening a street before requiring the widening, even when the existing right of way does not include a curb and gutter or the resulting roadway would be less than the standard dimension.	Consistent. As discussed in Section IV.I, Transportation/Traffic, of this Draft EIR, the Project would include Mitigation Measures I-3 and I-4, which would require widening of Riverside Drive. As part of the Traffic Study prepared for the Project, the Project Applicant consulted with LADOT and LADOT reviewed and approved the Traffic Study, including the proposed mitigation measures, prior to circulation of this Draft EIR. A copy of LADOT's Assessment Letter is included as Appendix G of this Draft EIR. <b>The street cannot be widened in any way. Any addition of lanes will be a compression of existing roads. This creates more density and traffic impacts on an already failing traffic pattern.</b>
Policy 3.2: Accommodate the needs of people with disabilities when modifying or installing infrastructure in the public right-of-way.	Consistent. The Project would be designed to provide accessibility and accommodate the needs of people with disabilities as required by the American with Disabilities Act (ADA) and the City.
Policy 3.3: Promote equitable land use decisions that result in fewer vehicle trips by providing greater proximity and access to jobs, destinations, and other neighborhood services.	Consistent. The Project would promote this policy by providing a new mixed-use development consisting of multi-family residential and neighborhood-serving commercial uses within one site and in close proximity to jobs (including those that may be offered on-site), destinations, and other neighborhood services. <b>The anticipated 125 jobs will not mitigate the proposed almost 900 new residents. The anticipated jobs will not accomadate the rents that are being proposed</b>
Policy 3.4: Provide all residents, workers and visitors with affordable, efficient, convenient, and attractive transit services.	Consistent. The Project would be located in an area well-served by public transit provided by Metro and LADOT, including bus stops along Riverside Drive and Hazeltine Avenue. <b>The area is not well served.</b>
Policy 3.8: Provide bicyclists with convenient, secure and well maintained bicycle parking facilities.	Consistent. As described in Section II, Project Description, of this Draft EIR, the Project would provide bicycle parking for residents and visitors in accordance with LAMC requirements and bicycle storage would be available within the parking level of each proposed building.
Policy 3.9: Discourage the vacation of public rights-of-way	Consistent. The Project would not include the of public rights-of-ways and public rights-of-way surrounding the Project Site would be maintained as part of the Project.
Policy 3.10: Discourage the use of cul-de-sacs that do not provide access for active transportation options.	Consistent. The Project would not include the development of a cul-de-sac.



Table IV.F-1 (Continued)  
Project Consistency with Applicable Objectives and Policies in the General Plan Framework

Objective/Policy	Analysis of Project Consistency
Policy 4.8: Encourage greater utilization of Transportation Demand Management (TDM) strategies to reduce dependence on single-occupancy vehicles.	Consistent. As discussed in Section IV.I, Transportation/Traffic, of this Draft EIR, as part of Mitigation Measure I-2, the Project Applicant would provide for the development and implementation of a Transportation Demand Management, which would include strategies to promote non-auto travel and reduce the use of single-occupant vehicle trips.
Policy 5.2: Support ways to reduce vehicle miles traveled (VMT) per capita.	Consistent. The Project would provide a distribution of various uses throughout an existing superblock that would encourage residents and employees to walk to on-site restaurants and community-serving retail. The Project Site is also located in a High Quality Transit Area as designated by the 2012–2035 RTP/SCS. Further, as discussed in Section IV.I, Transportation/Traffic, of this Draft EIR, the Project Site would be located in an area well-served by public transit provided by Metro and LADOT DASH. In addition, the publicly-accessible open space areas proposed by the Project would promote walkability in the vicinity of the Project Site. The Project would also provide bicycle parking spaces in accordance with LAMC requirements for Project residents and visitors. <b>This superblock does not allow for residents to work on site. The added jobs will not support the rents that are going to be charged.</b>
Policy 5.5: Maximize opportunities to capture and infiltrate stormwater within the City's public right-of-ways	Consistent. During operation, the Project would include BMPs to collect, detain, treat, and discharge runoff on-site before discharging into the municipal storm drain system as part of the Low Impact Development Ordinance. Thus, with the implementation of the BMPs and site design approaches, the Project would reduce runoff from entering the wastewater system and would maximize opportunities to capture and infiltrate stormwater.
Infrastructure and Public Services Chapter	
Policy 9.3.1: Reduce the amount of hazardous substances and the total amount of flow entering the wastewater system.	Consistent. As evaluated in Section IV.E, Hydrology and Water Quality, of this Draft EIR, and in the Initial Study, included as Appendix A of this Draft EIR, during Project construction, the Project would implement a Stormwater Pollution Prevention Plan (SWPPP) as required under the National Pollutant Discharge Elimination System (NPDES) General Construction Permit (Order No. 99-08-DWQ). The Project would implement Best Management Practices (BMPs) and other erosion control measures to minimize the discharge of pollutants in storm water runoff. In addition, during operation, the Project would include BMPs to collect, detain, treat, and discharge runoff on-site before discharging into the municipal storm drain system as part of the Low Impact Development Ordinance. Thus, with the implementation of the BMPs and site design approaches, the Project would reduce runoff from

Table IV.F-1 (Continued)

Objective/Policy	Analysis of Project Consistency
	entering the wastewater system.
Objective 9.6: Pursue effective and efficient approaches to reducing stormwater runoff and protecting water quality.	Consistent. As evaluated in Section IV.E, Hydrology and Water Quality, of this Draft EIR, and in the Initial Study, included as Appendix A of this Draft EIR, the Project would manage post-construction stormwater runoff with the implementation of BMPs as required by the Low Impact Development Ordinance to collect, detain, treat, and discharge runoff on-site before discharging into the municipal storm drain system. The implementation of the Project's BMPs and site design would result in an improvement in surface water quality runoff from the Project Site. In addition, the Project would not increase the percentage of impervious surface area on the Project Site.
Objective 9.10: Ensure that water supply, storage, and delivery systems are adequate to support planned development.	Consistent. Water service is provided to the Project Site via LADWP water lines. As evaluated in Section IV.J, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR, based on LADWP's demand projections provided in its 2010 Urban Water Management Plan, LADWP would be able to meet the water demand of the Project as well as the existing and planned future water demands of its service area. Furthermore, the Project would not exceed the available capacity within the distribution infrastructure that would serve the Project Site.

## Project Consistency with Applicable Objectives and Policies in the General Plan Framework

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Source: Eyestone Environmental, 2016.

## Page IV.F-5 General Plan Use

This chart shows that nowhere in the immediate area is there another high density project other than the already existing Fashion Square Mall which is effectively shielded from the neighborhoods. This is a conversion of the neighborhood to a different incompatible use.

I) Transportation/Traffic IV.I-1

## **b. Existing Conditions Intersection Levels of Service**

Intersection turning movement counts for the 14 study intersections were collected in January 2015 during the typical weekday morning (7:00 A.M. to 10:00 A.M.) and afternoon (3:00 P.M. to 6:00 P.M.) commuter peak periods. The traffic counts were conducted during typical weekdays while there were no holidays, no rain, and schools were in session.

Part I Traffic/Transportation The very basis of this whole study proves that it is flawed. This project is located adjacent to the Regional Sherman Oaks Fashion Square Mall Bordered by Hazeltine on the East side of subject and sharing the thoroughfare Riverside Drive.

-Living adjacent to the mall it is easy for anyone to observe that during the year the mall has busy periods. Further proof of this is the need for the mall to employ traffic officers on Riverside Drive and Hazeltine to control the flow. By ignoring this fact the very methodology of this report is inaccurate and flawed.

- The busy periods are:
- Valentines Day, the before February 14
- Mothers Day, Second Sunday in May, a week before
- Memorial Day, Last weekend of May, The week surrounding the holiday for Numerous Sales
- Fathers day, 3<sup>rd</sup> Sunday of June, the week before
- 4<sup>th</sup> of July, The holiday Week, Numerous Sales
- Labor day, First Monday in September, The week surrounding for Numerous Sales
- Halloween, October 31, Mall hosts special performance events
- Thanksgiving, November 4<sup>th</sup> Thursday, From the first Week November
- Christmas, December 25, Entire Month of December

This amounts to somewhere between 3-4 months of heavy traffic. None of these time periods were included in the study. This extra traffic load is not an anomaly and covers at least 25% of the year. For accurate results current traffic should be measured during one of these times.

During the scoping phase many (which are included in the Appendix) neighbors requested that the traffic study include a time period which accurately represents the traffic situation. Clearly these requests were not heeded.

The traffic problems around the Fashion Square Mall and Particularly the Hazeltine and Riverside intersection of Trader Joes and the proposed project are well known. If IMT is allowed to build this project as proposed with the limited mitigation outlined the problems will get much worse. The city will be responsible forever with this dysfunctional and

failing situation. A proper study should require more effective Study and mitigations as a condition of approval and construction.

**\*\*The DEIR needs to do an effective traffic study that encompasses some of these periods and on weekends. These are the times that will be most impacted by the project. The interesections and transit cooridors are failing much of the time. It is not a typical traffic pattern due to the existence of the Fashion Square Mall.**

Allowances have been made for onsite parking. There is no discussion about unavoidable parking overflow into the closeby neighborhoods. The report mentions that there will be secured parking for the residents. This will reduce the number of publicly available space from the 1,345 total spaces. When asked if the “public” spaces will be charged the developer was elusive and unwilling to answer the question. As with every residential and retail building if parking is not easy and convenient then it will create extensive problems for neighbors finding parking for themselves. This omission is a grievous oversight. These neighborhoods are between the VNSO Park, which frequently takes all available street parking as well as the Trader Joes Shopping center. This will undoubtably need future attention. It should be a condition of zoning changes that the facility provide FREE parking to the public in perpetuity.

**\*\*The DEIR should investigate the impact this project will have on nearby parking. This should include the necessary proposed traffic study during construction as well as once the project is complete that will be necessary to get a Prefeered Parking District to protect the neighbors quality of life**

V. Alternatives V-1

A,B,C,D,F V-11 thru V-138

None of the alternatives are significantly less dense than the proposed project. The current status is 25% of the proposed density. A compromise somewhere between the currentThe usage and the massive proposed usage should be considered carefully.

List of Appendicies

Appendix A Initial Study/NOP/Nop Comment Letters

Reading thru many of these comments it is clear that the DEIR does not cover or investigate many of the comments made at that time. In particular the timing and methodology of the traffic study.

Appendix C Historical resource Assesment

The Historical value of the Sunkist Building is undeniable. Orange Groves and those who ran and owned them largely built the area. The Sunkist Building is a monument to not only the notable architecture of the time but also the foresight and power of the Orange. The current proposal is a slap in the face to displaying the integrity of this building. The DEIR does not accurately cover this importance.

C.2 Archaeological and Paleontological Service Letters

This area, along the LA River was frequented by Indigenous Indians. Artifacts have been found in the past. A careful survey of the area before it is further disturbed should be conducted.

**My Conclusion:**

**This project is oversized and incompatible with the current nature of the existing neighborhood. It is an extreme departure from the current usages. There are many negative issues that will be exacerbated and created thru these proposed zoning changes and approval of this project. The developer is not taking responsibility for most of them and the city will be left trying to mitigate impossible problems FOREVER. Los Angeles City should not approve this project until many questions are answered, corrected and mitigated to the highest level possible. This Draft Environmental Impact Report is biased in great favor of the developer. It took over 2 years for uninterested out of the area professionals to craft this report. The citizens have been given only 60 days to review it. In this short time many flaws have been discovered. I request that the report is corrected addressing the concerns that I and many other citizens express in our responses. And then the citizens should be given a reasonable fraction of the time they take to review the report.**

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From: **Lane Townsend** <[lanetownsend@gmail.com](mailto:lanetownsend@gmail.com)>  
Date: Wed, Aug 31, 2016 at 12:01 PM  
Subject: Objection to Proposed IMT Development in Sherman Oaks  
To: [sarah.molina-pearson@lacity.org](mailto:sarah.molina-pearson@lacity.org), [david.ryu@lacity.org](mailto:david.ryu@lacity.org), [info@bradsherman.com](mailto:info@bradsherman.com)

Hello, Ms. Molina-Pearson, Mr. Ryu and Mr. Sherman -

I am a resident of Sherman Oaks and since becoming a homeowner here in 2013 I have been active in leading my community toward multiple areas of improvement. I've headed up an effort to establish a new Neighborhood Watch program assisted by open communication with local law enforcement. I am a liaison and organizational head for the members of my community and simply put, I care about what happens here as I'm sure you do.

There has been increasing discussion and concern about the company IMT Residential and their proposal to develop a large rental complex in our area. I understand the proposed location will be near the Sunkist building at Riverside Drive and Hazeltine Avenue. This is, indeed, a very popular area with a few shopping centers, banks, grocery stores and a public park immediately nearby.

These are all very busy venues and I truly believe the addition of, what I understand to be, a nearly 300 unit rental & retail complex would be a disastrous addition to our neighborhood. Currently parking at the grocery store and shopping centers are often packed to the hilt. Traffic on and off the 101 freeway at Van Nuys Boulevard and Woodman Avenues are typically backed up for great distances; and not only during morning and afternoon rush hours.

While I haven't experienced it for myself, I have been told that wait times in the emergency room at the nearby Sherman Oaks hospital have become longer and longer in recent years, too. I can say, though, that I have seen ambulances having difficulty even entering the hospital grounds due to the slow moving traffic on Van Nuys Boulevard. We've already lost the greatly renowned Grossman Burn Center in the past few years. It would be a shame to see other business & services become further weighed down than they already are.

I would like to give you all my personal objection to approving the IMT Residential proposal for development. In whatever step in the approval process this development is, I urge you to not allow it to continue. It will be bad for business and residents alike in multiple ways. I believe we are at capacity in this area and the addition some 300+ new residents and their vehicles would place great, unneeded stress on our already bustling community.

Please feel free to contact me at your convenience to discuss the matter further. I will happily bring the concerns and opinions of myself and my neighbors to light.

Thank you for your time.

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Lane Townsend  
Phone: [818.679.8000](tel:818.679.8000)  
Email: [LaneTownsend@gmail.com](mailto:LaneTownsend@gmail.com)

Keep up with me on...  
[Facebook](#) | [Twitter](#) | [Instagram](#) | [Vimeo](#)  
[IMDB](#) | [Actors Access](#) | [LA Casting](#)  
[www.LaneTownsend.com](http://www.LaneTownsend.com)

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From: **The Trantows** <[thetrantows@gmail.com](mailto:thetrantows@gmail.com)>  
Date: Fri, Jul 29, 2016 at 3:23 PM  
Subject: Sunkist Lot Construction  
To: "[sarah.molina-pearson@lacity.org](mailto:sarah.molina-pearson@lacity.org)" <[sarah.molina-pearson@lacity.org](mailto:sarah.molina-pearson@lacity.org)>

We object to the construction of this massive housing complex. It is going to make traffic, noise, quality of life worse. Not to mention the overcrowding of schools.

We ask that our names be added to the objections and that you please at least scale back on the massive amount of units being planned.

Thank you.

Kevin and RoseMary

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From: Alyse Wax <[alysewax@gmail.com](mailto:alysewax@gmail.com)>  
Date: Wed, Sep 14, 2016 at 4:13 PM  
Subject: In reference to EIR Case No. ENV-2014-1362-EIR (SCH No. 2014071001)  
To: [sarah.molina-pearson@lacity.org](mailto:sarah.molina-pearson@lacity.org)

I am writing in reference to EIR Case No. ENV-2014-1362-EIR (SCH No. [2014071001](#)), the proposed ICON development on the existing Sunkist building lot. I am a neighbor in this community and I am VERY against this project.

I live at 4801 Murietta Ave, on the corner of Murietta and Riverside, across the street from Bloomingdale's and across the street from the Sunkist building. My husband and I have lived here for 10 years. I think that the proposed building is going to significantly decrease the living conditions of our neighborhood. Among my major concerns:

1. The traffic. Traffic at the corner of Riverside and Hazeltine is already congested, especially around the holidays. Often times, the traffic on Riverside is backed up past Murietta, making it physically impossible to merge onto the street. On top of that, the intersection of Riverside and Hazeltine is prone to car accidents. I hear them all the time. As I write this, I can hear a near-miss with tires screeching and swerving. I can hear the car accidents from my living room. At least once a month there is a major accident right outside.
2. Parking. The number of proposed parking spots, 886, was reached because of a reduction allowed when provided with bicycle parking. But let's face it: Los Angeles is not a bicycling community. It is an automobile community. As nice as it is to think that everyone will get rid of their cars because there is a place to park their bike, it just isn't feasible. Between the often-sweltering heat and the expansiveness of the city, it is just not practical. There is no mention of parking for apartment guests. In addition, with restaurants and shops in the same area, there will be a non-stop flow of cars into the parking area. As it stands, parking in the neighborhood is getting unruly. On three separate occasions, I have found cars parked in front of my driveway, making it impossible for me to get my car out. On two of those occasions, I called the city to have the cars towed, but they only arrived in time to tow one of those cars.
3. Construction. I am concerned about the construction times that have been approved: 7am to 9pm. That is a huge time period. I frequently work nights, from home (I am a journalist) so to have to hear construction as I start my shift at 8pm, and then to be woken up to it at 7am (I often work until 4am and sleep through the morning) is not conducive to a healthy work or sleep environment.
4. Aesthetics. The Sunkist building is iconic. Surrounding it with new buildings does nothing to preserve the aesthetics of the building. May as well cover it with a giant tarp. The other IMT buildings in the neighborhood are eyesores, with large, boxy construction and bland colors that look like they were purchased on the clearance rack because no one in their right mind would choose to paint their home that color.

Thank you for your consideration. I am hopeful that the Sunkist project WILL NOT move forward as planned.

\*\*\*

Alyse Wax  
Writer. Reporter. Horror Nerd. TV Addict.

Cell: [818-406-1748](tel:818-406-1748)  
Skype: [818-824-6033](tel:818-824-6033) (interviews only)  
[alysewax@gmail.com](mailto:alysewax@gmail.com)  
[www.alysewax.com](http://www.alysewax.com)



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From: **Brian Weisberg** <[brianweisberg@me.com](mailto:brianweisberg@me.com)>  
Date: Wed, Aug 31, 2016 at 4:53 PM  
Subject: Proposed apartment building on the Sunkist Site in Sherman Oaks  
To: [sarah.molina-pearson@lacity.org](mailto:sarah.molina-pearson@lacity.org)  
Cc: [david.ryu@lacity.org](mailto:david.ryu@lacity.org)

Dear Councilmembers,

I am writing to voice my opposition to the IMT apartment building proposal at the corner of Hazeltine and Riverside Drive in Sherman Oaks. To say that it would have a negative impact on the neighborhood is an understatement. The increase of traffic and pollution alone is enough to oppose. Take into account the plain ugliness of the buildings this company builds, which look like housing projects and a charming neighborhood is negatively impacted.

Thank you and please listen to the community, not only developers.

Best,  
Brian Weisberg



Sarah Molina-Pearson &lt;sarah.molina-pearson@lacity.org&gt;

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**IMT Sunkist DEIR comments**

1 message

**Spu345@aol.com** <Spu345@aol.com>

Mon, Sep 26, 2016 at 1:59 PM

To: Sarah.molina-pearson@lacity.org

Cc: cd4.issues@lacity.org

Sarah and Councilman Ryu,

All of a sudden Sherman Oaks seems to be a hotbed of activity.....and not in a good way. I have lived in a quiet, sleepy enclave next to the Fashion Mall for 14 years. I love living here.

I Don't love the new behemoth nightmare SUNKIST development that is currently being contemplated to be built. Seriously, if you have ever driven by Hazeltine and Riverside on a holiday weekend as people fight to get in and out of the mall and Trader Joe's parking lot, well, you already feel my pain.

Instead of making a left turn in one light, easily at Hazeltine and Riverside as I commute to work in the morning, the traffic patterns are very congested and now it can take three light cycles to make the same turn adding sometimes up to six minutes to my commute that I need to factor in. This, along with all of the ridiculously oversized McMansions in my very old-fashioned neighborhood is bringing much unhappiness to my neighborhood. It seems to be all anyone can talk about.

The idea that you would overbuild on that corner of the Sunkist building at Hazeltine and Riverside is unbelievable and woefully shortsighted. I understand a little commerce, but to add 300 units of people going in and out daily at every moment of the day and night makes me cringe.

**PLEASE RECONSIDER THE IMPACT THIS WILL HAVE WITH THE GIANT MALL RIGHT ACROSS THE STREET!**  
Better yet, come drive here on a weekday morning, or on the weekend and see how congested and overloaded the area already is.

Along with impacting the population and creating traffic gridlock there is also the consideration of losing beautiful trees, which impact the bird population, upsetting the delicate balance that seems to be thriving nicely currently.

Once those plans are approved, nothing can take it back. Please have the good judgement and foresight to think a bit into the future. Commercial only and downsize. No building variances! Please consider the community welfare and NOT the developer's.

We don't need to overdevelop the space the way the McMansions have in this charming neighborhood. As you drive down the streets of homes built primarily in the 1940s, the giant oversized Cape Cods stand out like a giant sore thumb, taking away the beautiful trees and sunlight and space. Let's NOT make this the next West LA with traffic gridlock. We live here to get away from the overdeveloped high-density population.

Drive around here, take a field trip. Go look at the UGLY IMT units all along Riverside near Coldwater that are not full and seem to be right on the sidewalk. Let's leave a small bit of space and not overpopulate with the proposed 300 units that would bring in 450+ people.

Please treat this as if you lived here. It matters to us and it should to you. Thanks for your time.

Leslie L. White  
14018 Hesby Street  
Sherman Oaks CA 91423

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From: **CaroleJean Willis** <[cjluvs cupcake@icloud.com](mailto:cjluvs cupcake@icloud.com)>

Date: Tue, Aug 30, 2016 at 4:53 PM

Subject: Sunkist site

To: [sarah.molina-pearson@lacity.org](mailto:sarah.molina-pearson@lacity.org)

Cc: [david.ryu@lacity.org](mailto:david.ryu@lacity.org)

I truly hope you will deny the development of an additional 300 units plus retail at the Sunkist site, Hazeltine and Riverside Drive. The Sherman Oaks area has been so inundated by this developer who wants to build even more apts and some retail. The traffic alone is enough to say - enough. Then there is the air pollution, water usage and its ensuring pollution. And what about all those beautiful old trees .. Trees that constantly get cut down, depriving us the air cleanser they provide and the sanctuary for birds, insects and small animals.

You folks have control of our lives in these matters. I just hope you will consider this when approval is requested. Stand up for the people and say no, enough.

Thank you for considering the ramifications an approval would bring.

CJ Willis

5811 Woodman Ave, #4

Valley Glen, CA 91401

Sent from my iPad

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From: **Gregory D. Wright** <[bg534@lafn.org](mailto:bg534@lafn.org)>  
Date: Tue, Sep 27, 2016 at 11:37 PM  
Subject: ICON Sherman Oaks project - Draft EIR, July 2016: Detailed Comments from Adjacent Resident Gregory Wright - September 27, 2016 (2014-2015 Comments, Revised/Expanded)  
To: [sarah.molina-pearson@lacity.org](mailto:sarah.molina-pearson@lacity.org)  
Cc: Alice Roth <[alice.roth@lacity.org](mailto:alice.roth@lacity.org)>

Sarah Molina-Pearson  
City of Los Angeles, Department of City Planning  
200 North Spring Street, City Hall Room 750  
Los Angeles, CA 90012  
[sarah.molina-pearson@lacity.org](mailto:sarah.molina-pearson@lacity.org)

Re DEIR: <http://planning.lacity.org/eir/ICONshermanOaks/DEIR/index.html>  
EIR No. ENV-2014-1362-EIR  
Project Name: ICON Sherman Oaks  
Project Address: 14130 and 14154 Riverside Drive, Los Angeles, CA 91423  
Community Planning Area: Van Nuys-North Sherman Oaks  
CD: 4, Councilmember David Ryu  
Due Date for Public Comments: September 27, 2016

Hello again.

I am a resident at 14161 Riverside Drive in Sherman Oaks, residing on the front south-facing side of our multi-family building directly across Riverside Drive from the referenced ICON Sherman Oaks project. I have previously submitted comments to you about this project in 2014 and 2015. I've also previously submitted my concerns and suggestions to Alice Roth, Senior Deputy of Councilmember David Ryu, and to Renee Weitzer, Chief of Land Use Planning-South for then Councilmember Tom LaBonge, as well as appropriate members of the Sherman Oaks Neighborhood Council.

I have not had an opportunity to review the Draft Environmental Impact Report, and am not sure which if any of my previously expressed concerns, ideas, and suggestions are reflected in the DEIR. So I write now to reiterate and partially restate my deep concerns about this project and its impact on my and my wife's lives here in Sherman Oaks, and on our community.

In my comments I have boldfaced my main ideas and points; I hope this makes my document easier to review. In the current document, I have separately listed these main ideas and points immediately below:

**First and foremost, this massive project must be downsized by at least 20 percent, the size of the water-use reduction that the City has declared as a vital environmental requirement for the future of Los Angeles.**

**A two story- to three story-high modular vegetated greenwall should be designed and installed to contain and absorb fossil fuel emissions, airborne dust and particulate matter, equipment and other noise, and nighttime light pollution.**

**The ICON project's developers should be required to fund local public transportation improvements in capacity, frequency, and quality, and to energetically help to promote these improvements among the ICON development's occupants and in the local community – for example by promoting the DASH service with one or a couple of large poster-size DASH route maps that would appear on nearby walls in the ICON retail area**

**The Metro Line 155 buses and the LADOT Van Nuys-Studio City DASH Connectors must be made more frequent and must run later than now – and these improvements heavily promoted by the City, Metro, and LADOT.**

**The City must mandate purchase by the ICON project developers of Metropolitan Transportation Authority TAP cards -- transit passes -- and their subsequent conveyance to all of the new residents of the ICON project. These should be complete year-round passes and they should be provided to all of the residents for at least several years; new residents who move into the development in all subsequent years should also receive this "move-in" allotment of several years worth of full-value TAP cards/transit passes (or of lower-cost Senior passes for residents who so qualify by age), and/or expand the application of the group rate discounted B-TAP cards for residents of affordable housing to the ICON-Sherman Oaks residents.**

**The ICON Project developers should be required to work with all of the retail occupants of the site to creatively limit the amount of automotive traffic into and out of these restaurants and stores -- for example, working with retailers to offer well-publicized discounts and other perks to customers who arrive and depart on public transportation.**

**The Van Nuys-Studio City DASH route should be extended eastward from its current terminus at Ventura and Laurel Canyon Boulevards to the Universal City Red Line subway station.**

**The former Pedestrian Tunnel under the 101 Ventura Freeway at Tyrone Avenue that was closed around the turn of the century needs to be reopened.**

**Planning, LADOT, the City Council, and ICON to seriously consider and subsequently implement suitable traffic calming and other traffic safety interventions in the local area to reduce the high-speed and aggressive driving that is all too common in this area.**

**The roofs of all structures in the ICON development should be certified urban heat island-mitigating white roofs and/or vegetated 'green roofs.'**

**Further, all of the wonderful coniferous trees (there are at least 25 of these) on the project site should be retained! These are large, beautiful, old, carbon-sequestering trees that cannot and will not soon be replaced by new plantings.**

**Outdoor "canned music" and overly loud indoor music and audible media should be strictly prohibited and monitored by the City after the project is completed and in operation.**

**The level of exterior lighting in the ICON Project including illumination and onsite commercial signage should be strictly defined, limited, and controlled.**

**Offsite (billboard) signage, both static and digital, should be strictly *and by regulation forever* prohibited here.**

**The ICON project should be required as a condition of Planning approval to create a secure storage space for a supply of emergency water for the surrounding community (whose water needs following a disaster such as a great earthquake will be only strained by the additional residents of the ICON Project) in the form of hundreds of separately and easily carried containers ready for distribution to neighborhood residents if the need arises due to LADWP water distribution interruptions). (Especially relevant re the L.A. Times, Dec. 16, 2014: [Quake could cut off L.A.'s water supply](#).)**

**The area along the south side of the Sunkist/ICON property, the developer states, will be preserved in its present planted state as a small public park. This back-of-ICON 'pocket park' could be expanded into a larger modest but full-fledged public park, a Los Angeles River Center, a public recreation**

area, and/or a covered playground, and even a covered performing arts space if the ICON project's proposed park is expanded southward to include the large and dramatic open-air covered area under the Ventura 101 Freeway that is now occupied by an Auto Club auto service and storage area, plus a bit of additional public park area with a platform and access walkway over the Los Angeles River between the area under the freeway and the small section of Stansbury Avenue south of there.

Thank you.

Gregory Wright (Member, SONC Green & Beautification and Transportation Committees)  
14161 Riverside Drive, #3  
Sherman Oaks, CA 91423

[\(818\) 784-0325](tel:8187840325) / [greq@newciv.org](mailto:greq@newciv.org)

September 27<sup>th</sup>, 2016

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## **COMMENT FROM GREGORY WRIGHT, SHERMAN OAKS RESIDENT RE **IMT ICON – SHERMAN OAKS PROJECT** TO THE LOS ANGELES DEPARTMENT OF PLANNING**

(July 15, 2014, slightly expanded July 29, August 31, December 5, 2014; January 22 and March 27, 2015;  
June 6 and September 27, 2016)

Sarah Molina-Pearson  
City of Los Angeles, Department of City Planning  
200 North Spring Street, City Hall Room 750  
Los Angeles, CA 90012  
[sarah.molina-pearson@lacity.org](mailto:sarah.molina-pearson@lacity.org)

Re DEIR: <http://planning.lacity.org/eir/ICONshermanOaks/DEIR/index.html>  
EIR No. ENV-2014-1362-EIR  
Project Name: ICON Sherman Oaks  
Project Address: 14130 and 14154 Riverside Drive, Los Angeles, CA 91423  
Community Planning Area: Van Nuys-North Sherman Oaks  
CD: 4, Councilmember Tom LaBonge  
Scoping Meeting Date: Tuesday, July 15, 2014  
Due Date for Public Comments: July 30, 2014

Hello.

I am a resident at 14161 Riverside Drive in Sherman Oaks, on the front south-facing side of our multi-family building directly across Riverside Drive from the referenced ICON project. I am extremely concerned about the negative impacts that I, my wife, our residence, quality of life and health, and the local environment will experience from the construction and operation of this enormous development.

There are several ways that the developers of the ICON Sherman Oaks project can mitigate the negative impacts on the surrounding residents and environment during the ICON project's long period of construction, and thereafter as a very large residential and retail environment just a few yards away from my front door, front windows, and front balcony.

**First and foremost, this massive project must be downsized by at least 20 percent, the size of the water-use reduction that the City has declared as a vital environmental requirement for the future of Los Angeles.** This will still allow some approximately 238 dwelling units in the ICON project, some 31,000 square feet of new commercial and retail development, and the reduction of only some 270 of the planned massive 1,345 auto parking spaces in the portion of the project closest to my residence. The currently planned 298 new multi-family units and more than 39,000 square feet of new commercial and retail development, and the associated auto traffic and parking, are just too much development for this still largely suburban area of Los Angeles!

Whether or not the project is downsized or by how much, I offer the following ideas as creative and very fair ways that the developers of the ICON Sherman Oaks project can mitigate the negative impacts on the surrounding residents and environment during the ICON project's long period of construction, and thereafter as the new development is occupied and operated, and many new automobile impacts are generated.

#### **ICON Sherman Oaks Project Construction Period Impacts and Mitigation:**

My wife and I, and neighbors I have spoken with, are concerned with the multiple impacts that will occur during what will clearly be an extended construction period, including fuel emissions, dirt and dust, noise pollution, and nighttime light intrusion. The ICON project developers should be required to construct an effective substantial barrier on the front (north) side of the development facing Riverside Drive and the multiple multi-family residential buildings along it, including ours; and the developers should construct a similar barrier on the project's western side, facing residences along Calhoun Avenue, as well. The City of Los Angeles and its Planning Department have an opportunity to implement what I suspect would be a new best-practices residential-area construction-project mitigation measure:

**a two story- to three story-high modular vegetated greenwall should be designed and installed to contain and absorb fossil fuel emissions, airborne dust and particulate matter, equipment and other noise, and nighttime light pollution.**

Modular vegetated panels are available from a number of providers (such as L.A.-based Greenscreen: [www.greenscreen.com](http://www.greenscreen.com)) and are very flexible and adaptable.

My wife suffers from serious asthma, and we are very concerned about the additional pollution impacts on our lives that the ICON project will introduce. The construction of a substantial green barrier such as I describe would be the best way to address this concern.

Following the completion of construction, these greenwall panels could be re-assembled on the ICON development's southern exposure to help shield the residences and commercial locations within the ICON area from the very considerable air pollution emissions and noise emanating from the immediately-adjacent Ventura 101 Freeway on the Site's south side.

#### **ICON Sherman Oaks Project Permanent Impacts - Traffic and Public Transportation:**

The permanent great increase in auto traffic and traffic's impacts, and in noise pollution and light pollution from the project are of great concern to me.

**The ICON project's developers should be required to fund local public transportation improvements in capacity, frequency, and quality and energetically help to promote these improvements among the ICON development's occupants and in the local community;** and should be required to help mitigate the impacts of the increased local vehicle traffic the ICON development will cause. My wife and I are part of the growing car-less L.A. constituency who depend on *both* robust public transportation *and* on continued efforts to control excessive vehicle speeds, aggressive and reckless driving, and the sheer volume of the ever-growing rivers of cars and pickup trucks that ply the L.A. hardscape.



Whether or not IMT and the ICON project help fund local public transit, **the Metro Line 155 buses and the LADOT Van Nuys-Studio City DASH Connectors must be made more frequent and must run later than now – and these improvements heavily promoted by the City, Metro, and LADOT.**

An excellent way the ICON Project's developers can reduce the expected massive traffic impacts of pollution, noise, congestion, car danger to transit users and pedestrians such as myself and my wife, will be **the City-mandated purchase by the ICON project developers of Metropolitan Transportation Authority TAP cards -- transit passes -- and their subsequent conveyance to all of the new residents of the ICON project. These should be complete year-round passes and they should be provided to all of the residents for several years; new residents who move into the development in all subsequent years should also receive this "move-in" allotment of several years worth of full-value TAP cards/transit passes** (or of lower-cost Senior passes for residents who so qualify by age).

Relevant to this suggestion is the consideration by the Metro Board (in the Executive Management Committee Response to Request for Information Regarding Affordable Housing and Metro Involvement, Feb. 19, 2015) of expanding the application of the group rate discounted B-TAP cards to the residents of affordable housing, which I understand is included (although not sufficiently in my view) in the ICON project.

There are other precedents for this idea from beyond Los Angeles, and several similar regulations, in other jurisdictions, notably in Berkeley with its new parking spaces code that makes accommodations for transit, biking and car-share users in addition to private vehicle owners. Los Angeles should adopt these regulations or versions of them, and require these at the ICON Project. Some of most interesting regulations include (from [www.smartgrowthamerica.org/2014/08/12/smarter-parking-codes-to-promote-smart-growth/](http://www.smartgrowthamerica.org/2014/08/12/smarter-parking-codes-to-promote-smart-growth/)):

Designated parking for car-share: At least *one* car-share parking space must be designated in new residential developments that offer 11-30 private car parking spaces. Those providing 31-60 regular spaces must designate *two* car-share spaces, and developments with more than 60 regular spaces must designate *three* car-share spaces plus one additional for each successive increment of 60 regular spaces. People are more likely to opt to use car-share if there is reliable parking in their building. Car-sharing programs are becoming increasingly popular in cities across the country because they provide an affordable and convenient alternative to private car ownership.

"Unbundling" purchase of housing units from purchase of car parking: Private vehicle parking spaces must be priced and sold separately from the rental or purchase of dwelling units. This lets the household decide if they would like to take on the expense of a parking space, as opposed to that parking cost automatically being bundled into the lease or sale price. This makes housing more affordable because households can opt to forgo the cost of a parking space if they don't need it. This policy works particularly well when the multi-family building is near transit or in a place where owning a car is not as critical to quality of life.

Transit benefits for workers and residents: Property owners of new developments over 20,000 square feet must provide every employee and residential unit with a free pass for unlimited local bus service or similar transit benefit of the same value. This policy promotes transit use among new residents in congested downtown neighborhoods and it reduces traffic and car parking demand.

Also:

This requirement of free passes to new residents should become an integral part of Planning Department and other City requirements for new developments going forward into our City's, State's, and planet's dangerously carbon- and climate-challenged future.

For the same set of reasons, **the ICON Project developers should be required to work with all of the retail occupants of the site to creatively limit the amount of automotive traffic into and out of these restaurants and stores -- for example, working with retailers to offer well-publicized discounts and other perks to customers who arrive and depart on public transportation** (Metro buses and LADOT DASH Connector buses) using TAP cards they present when making purchases.



This is a multi-agency activity (Planning, LADOT, Metro, etc.) that the City should also engage existing retailers on!

The City should work with the ICON developers to **add more DASH Connector buses to the Van Nuys-Studio City DASH route that passes the ICON development on Hazeltine Avenue and to promote the DASH service with one or a couple of large poster-size DASH route maps that would appear on nearby walls in the ICON retail area** -- perhaps working with other retail organizations along this DASH route, such as the Westfield Mall (which has expressed interest in doing this), Trader Joe's, and Ralph's Market among others, and the Los Angeles Department of Transportation, to design, produce, and display these large-scale route maps on their premises.

(Furthermore, **the Van Nuys-Studio City DASH route should be extended eastward from its current terminus at Ventura and Laurel Canyon Boulevards to the Universal City Red Line subway station.** This DASH route would be much more useful to the Sherman Oaks community and the future residents of and visitors to the ICON development with this extension. ICON, the Department of Planning, and LADOT should work together to make this happen.)

ICON, the City, and Metro should work together to **increase the frequency of the essential Line 155 bus that runs along Riverside Drive** between central Sherman Oaks on the west and the Universal City Red Line subway station and further points to the east. In tandem with these efforts, the City should consider permitting a reduced number of car parking spaces in the ICON development.

**The former Pedestrian Tunnel under the 101 Ventura Freeway at Tyrone Avenue that was closed around the turn of the century needs to be reopened** -- with added security lighting and closed-circuit cameras, as appropriate -- in order to facilitate foot traffic between the ICON Project (and the north-of-101/east-of-Van-Nuys-Boulevard Sherman Oaks neighborhoods) and the central Sherman Oaks business and shopping district -- especially to reduce and mitigate the coming enormous increase in auto traffic out of and into the ICON development.

Metro's Active Transportation and Sustainability program staff should be brought into Planning's consideration of these ideas.

Furthermore, I strongly request that Planning, LADOT, the City Council, and ICON to seriously consider and subsequently **implement suitable traffic calming and other traffic safety interventions in the local area to reduce the high-speed and aggressive driving that is all too common in this area**, including reinstating the primary speed enforcement by LAPD that was common along this stretch of Riverside Drive in the 1990s and early 2000s, now inexplicably absent, even while the speed limit on Riverside Drive was increased several years ago from 35 mph to 40 mph due to the so-called MUCTD "85th Percentile Rule."

A general recommendation and request in this regard: The City's commendable effort to make L.A.'s 'big data' more transparent, accessible, and useful should include the recorded speeds along certain arterial stretches -- perhaps starting with arterial locations where residents/businesses request it. With increasing frequency, cars pass my home on Riverside Drive literally at freeway speed and near-freeway speed! Frankly, speed cameras recording high-speed offenders for the purpose of a law enforcement response (at least for those drivers of vehicles with actual California license plates, but that's another story) need to be implemented -- again, perhaps starting with arterial locations where residents/businesses request it. .

ICON Sherman Oaks Project Permanent Impacts - Urban Heat Island Effects:

**The roofs of all structures in the ICON development should be certified urban heat island-mitigating white roofs and/or vegetated 'green roofs.'**

Further, **all of the wonderful coniferous trees (there are at least 25 of these) on the project site should be retained!** These are large, beautiful, old, carbon-sequestering trees that cannot and will not soon be

replaced by new plantings. If the project is downsized as I and my neighbors hope, the downsizing should occur in a way that saves from development the space occupied by these trees, and therefore these trees.

ICON Sherman Oaks Project Permanent Impacts - Noise Intrusion from the ICON Development:

**Outdoor "canned music" and overly loud indoor music and audible media should be strictly prohibited and monitored by the City** after the project is completed and in operation; this requirement should be clearly included in the Planning permissions the ICON development ultimately receives. The same should be required in regard to all other noise sources within the project, including vehicle-associated noise pollution.

ICON Sherman Oaks Project Permanent Impacts - Light Intrusion from the ICON Development:

**The level of exterior lighting in the ICON Project including illumination and onsite commercial signage should be strictly defined, limited, and controlled.** A sincere attempt should be made to radically minimize the amount of new light introduced into our environment from the ICON development -- both above and laterally from the sides of the project site.

Also, **offsite (billboard) signage, both static and digital, should be strictly and by regulation forever prohibited here.**

I note that the State, City, and our country are, at long last, engaged in a serious effort to reduce energy use and the carbon emissions associated with it. A sincere, sustained, and creative effort to minimize such environmental effects as light and noise pollution is precisely in accord with this overarching societal and political effort that will only grow with the passage of time for the rest of our lives.

ICON Sherman Oaks Project: How ICON Can Assist Sherman Oaks Post-Disaster Community Resilience:

**The ICON project should be required as a condition of Planning approval to create a secure storage space for a supply of emergency water for the surrounding community (whose water needs following a disaster such as a great earthquake will be only strained by the additional residents of the ICON Project) in the form of hundreds of separately and easily carried containers ready for distribution to neighborhood residents** if the need arises due to LADWP water distribution interruptions.

(Especially relevant vis-a-vis this December 16, 2014 article in the L.A. Times, [Quake could cut off L.A.'s water supply.](#))

ICON Sherman Oaks Project: Adjacent Public Pocket Park or River Center:

The area along the south side of the Sunkist/ICON property, the developer states, will be preserved in its present planted state as a small public park. **This back-of-ICON 'pocket park' could be expanded into a larger modest but full-fledged public park, a Los Angeles River Center, a public recreation area, and/or a covered playground, and even a covered performing arts space if the ICON project's proposed park is expanded southward to include the large and dramatic open-air covered area under the Ventura 101 Freeway** that is now occupied by an Auto Club auto service and storage area, plus a bit of additional public park area with a platform and access walkway over the Los Angeles River between the area under the freeway and the small section of Stansbury Avenue south of there, at the jog intersection of Hortense and Valleyheart streets. (An additional potential use of the covered space beneath the freeway could be as a homeless persons' "residential village," complete with safe places to sleep, shower and toilet facilities, mail delivery, and perhaps a kind of communal kitchen. Although this idea would be a very hard sell, I note that a small homeless encampment at present occupies a portion of the back side of the Sunkist property.)

Thank you for your and the Planning Department's attention to these concerns and ideas, which I have shared with my Councilmanic representatives and the local Sherman Oaks Neighborhood Council, and the Neighborhood Council's Green and Beautification Committee, of which I am a member, and the Neighborhood Council's Land Use Committee.

Gregory Wright  
14161 Riverside Drive, #3  
Sherman Oaks, CA 91423

[\(818\) 784-0325](tel:8187840325) / [greg@newciv.org](mailto:greg@newciv.org)

Submitted 15 July 2014 and revised 29 July 2014. Revised and submitted again 27 March 2015; and slightly expanded 6 June 2016.

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----- Original Message -----

**From:** [Gregory D. Wright](mailto:Gregory D. Wright)  
**To:** [sarah.molina-pearson@lacity.org](mailto:sarah.molina-pearson@lacity.org)  
**Sent:** Tuesday, July 29, 2014 6:01 PM  
**Subject:** ICON Sherman Oaks project - EIR No. ENV-2014-1362-EIR: Comment from Adjacent Resident Gregory Wright

Sarah Molina-Pearson  
City of Los Angeles, Department of City Planning  
200 North Spring Street, City Hall Room 750  
Los Angeles, CA 90012  
[sarah.molina-pearson@lacity.org](mailto:sarah.molina-pearson@lacity.org)

EIR No. ENV-2014-1362-EIR  
Project Name: ICON Sherman Oaks

Hello Sarah.

Thank you for your July 21st acknowledgement of receipt of the comments concerning the ICON Sherman Oaks project I submitted to the City Department of Planning. I am today submitting an expanded version of my comments. I have shared most of the ideas in my original submission as well as the ideas I have added to the copy below, at the Public Scoping Meeting on July 15th, with the architect and landscape architect (Greg Verabian of Johnson Fain and Duane Border of Duane Border Design), IMT's Vice President of Real Estate Development Jeremy Byk, and Consultant Ira Handelman, and will subsequently share my revised submission below with them, as well as my City Council representative Tom LaBonge and his Planning Deputy Jonathan Brand.

Please place a copy in the Planning file and forward it to the environmental consultant.

I do hope that your department will seriously consider and address my concerns, and bring the ideas I have described into the process of properly planning, scaling, and shaping the massive ICON project.

Thank you.

Gregory Wright  
14161 Riverside Drive, #3  
Sherman Oaks, CA 91423

[\(818\) 784-0325](tel:8187840325) / [greg@newciv.org](mailto:greg@newciv.org)

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----- Original Message -----

**From:** "Sarah Molina-Pearson" <[sarah.molina-pearson@lacity.org](mailto:sarah.molina-pearson@lacity.org)>  
**To:** "Gregory D. Wright" <[bg534@lafn.org](mailto:bg534@lafn.org)>  
**Sent:** Monday, July 21, 2014 9:15 AM  
**Subject:** Re: ICON Sherman Oaks project - EIR No. ENV-2014-1362-EIR: Comment from Adjacent Resident

Gregory,

Thank you for submitting your letter. I will place a copy in the file and forward your email to the environmental consultant.

Please let me know if you have any questions.

Sincerely,  
Sarah Molina-Pearson  
City Planning Associate  
Los Angeles Department of City Planning, Major Projects

---

*GREGORY WRIGHT / WRIGHT THINKING*  
[greg@newciv.org](mailto:greg@newciv.org) = [bg534@lafn.org](mailto:bg534@lafn.org)

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From: SOTalksNewsletter <[sotalks4u@sbcglobal.net](mailto:sotalks4u@sbcglobal.net)>  
Date: Wed, Sep 28, 2016 at 3:40 PM  
Subject: Please put in Sunkist/IMT File  
To: Sarah Molina-Pearson <[sarah.molina-pearson@lacity.org](mailto:sarah.molina-pearson@lacity.org)>

Dear Ms. Molina-Pearson:

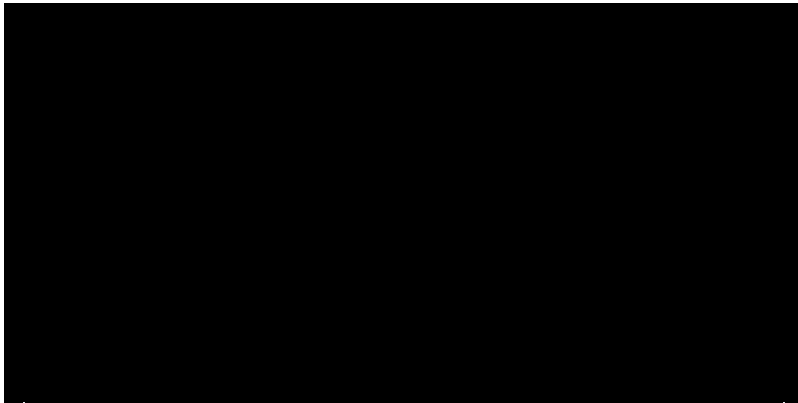
While I realize that the period for the Public Comments has expired for the DEIR for the above project, I would very much appreciate you including this email in the project file, in a manner that respects the conclusion of the Comment Period. We had intended to include the larger photo, below, in our comments, however, I understand that it cannot be a part of our Comments.

Thank you in advance for your assistance with this matter.

Wendy Brogin

Taken from Los Angeles Daily News 7-29-14

[Los Angeles Planning Department to review development plans for Sunkist building in Sherman Oaks](#)



**Los Angeles Planning Department to review development plans for Sunkist bui...**

A plan to have a massive development around the Sunkist building in Sherman Oaks to add residential, commercial ...



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From: **Marcy McCusker** <[mccusker8@hotmail.com](mailto:mccusker8@hotmail.com)>

Date: Mon, Oct 3, 2016 at 10:59 PM

Subject: Sunkist Building in Sherman Oaks

To: "[Sarah.molina-pearson@lacity.org](mailto:Sarah.molina-pearson@lacity.org)" <[Sarah.molina-pearson@lacity.org](mailto:Sarah.molina-pearson@lacity.org)>, "[cd4.issues@lacity.org](mailto:cd4.issues@lacity.org)" <[cd4.issues@lacity.org](mailto:cd4.issues@lacity.org)>

To: Sarah Molina-Pearson, City of Los Angeles  
Councilman David Ryu

IT IS IMPERATIVE that you do everything possible on behalf of the homeowners/residents of Sherman Oaks to mitigate the significant negative impacts of SUNKIST ICON by REDUCING the size of the proposed development . Additionally, a 30-day extension is requested for the DEIR public comment window in order to allow sufficient time for public review. Specifically, adding 300 MORE apartment units (and an estimated 900 people and 600 more cars!) to our area is OVER-development! Especially since IMT has recently built 6 massively-huge apartment complexes, three or more stories tall, and some being a city block long--ALL WITHIN A 3 MILE RADIUS HERE IN SHERMAN OAKS!! I understand that these recently-built IMT developments are NOT at full occupancy, making the addition of 300 MORE in the same area OVERDEVELOPMENT, unneeded, and undesirable. Huge, multiple negative impacts to our community will result, namely: WORSENING OF TRAFFIC WORSENING OF AIR POLLUTION AND NOISE LESSENING OF AIR QUALITY (and the destruction of many mature trees!) DEEPER STRAINS TO PUBLIC SERVICES (police, fire, hospital, etc.), WHICH ARE ALREADY INADEQUATE! This development MUST be significantly downsized to being either JUST COMMERCIAL or COMMERCIAL PLUS NO MORE THAN 50 APARTMENT UNITS. 300 MORE APARTMENTS IS ABSOLUTELY UNWARRANTED, and if built, would be done so at the sole benefit of IMT (and city) profits--and NOT in the service of the well-being of our community and its residents. Thank you for your immediate and full cooperation on behalf of your constituents in Sherman Oaks!

Sincerely,

Marcy McCusker Sporman  
13823 Riverside Drive #3  
Sherman Oaks, CA 91423