

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.

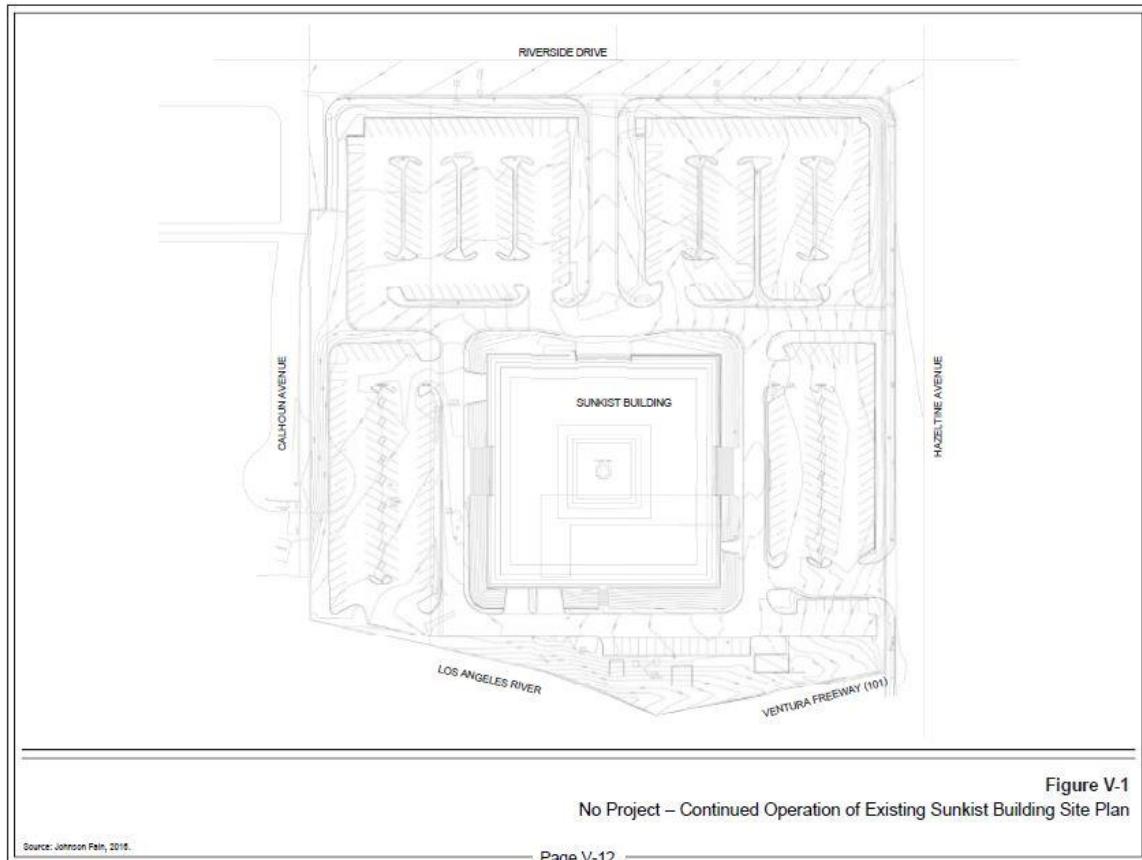
Comment: Concern regarding the access to the Project Site from the Los Angeles River may not be maintained, and that some of the Alternatives studied in the DEIR did not include maintaining the river access.

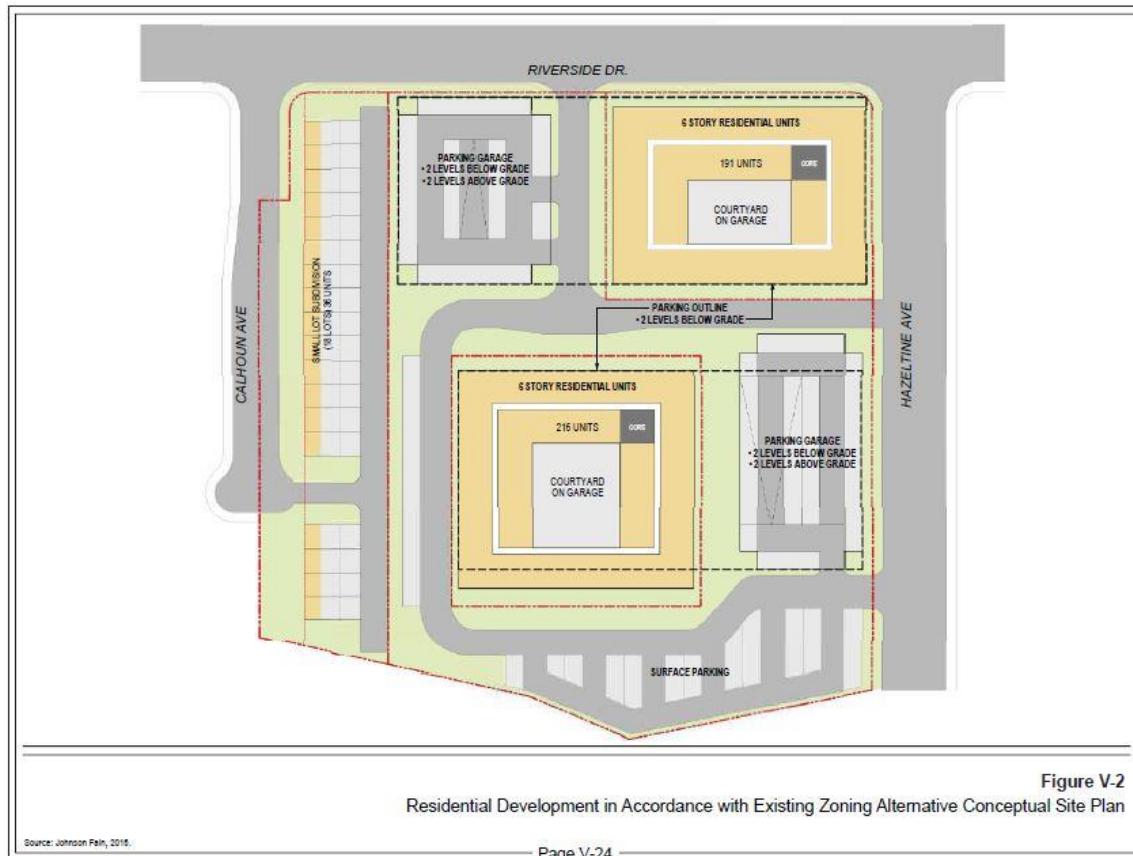
Proposed Alternative 6: Design a project that establishes the grade of the site at the elevation of the Sunkist Buildings entrance level. Tuck the parking under this new ground level and landscape the top as an open public space. Flip the “Plaza” shown in Alternative 5 to east along Hazeltine. The goal 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.

Please send your comments to: Ms. Sarah Molina-Pearson

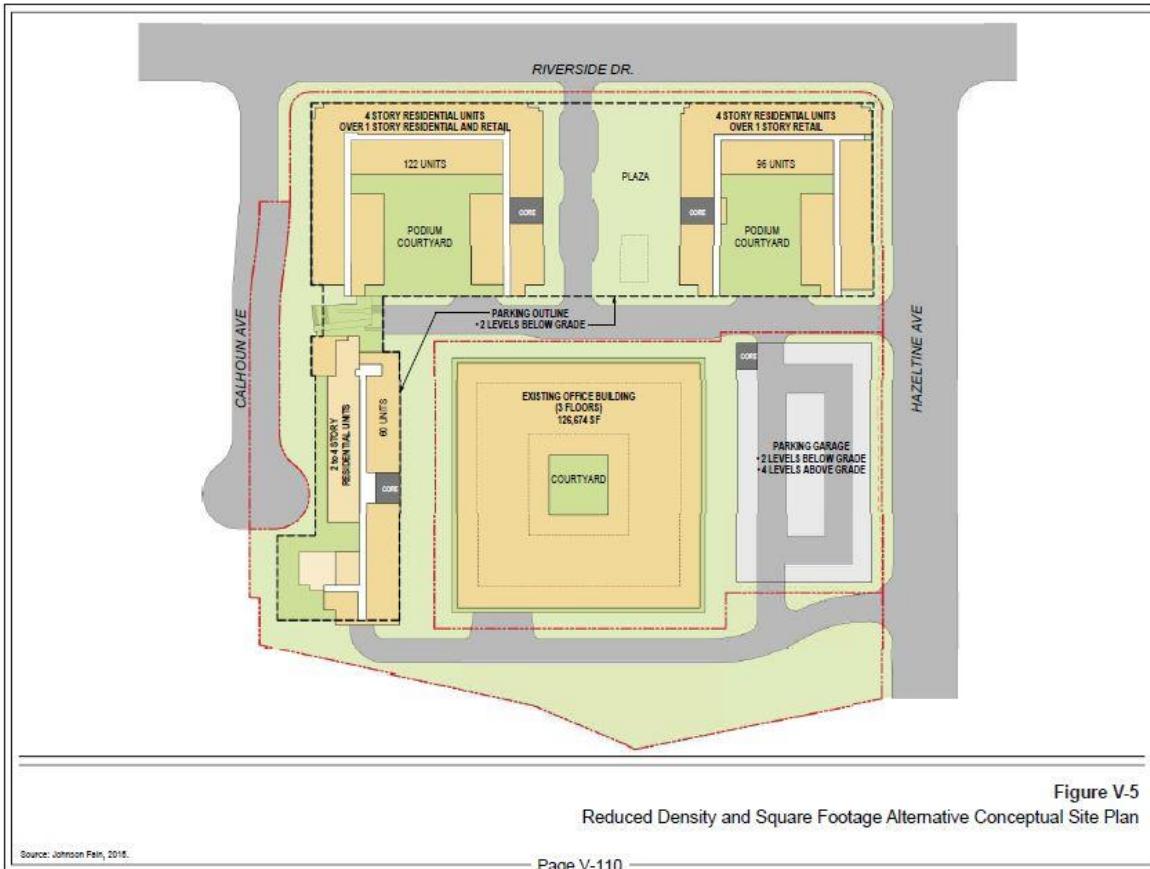
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ALTERNATE 1





ALTERNATE 2



ALTERNATE 5