

May 6, 2014

Submitted by e-mail

Scott Johnson
City of Sacramento
Community Development Dept.
Environmental Planning Services
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Re: Notice of Preparation, Sacramento Commons Project (P14-012)

Dear Mr. Johnson:

On behalf of Sacramento Modern (SacMod), thank you for the opportunity to comment on the Notice of Preparation (NOP) of a Sustainable Communities Environmental Assessment (SCEA) for the Sacramento Commons Project (Commons). As you know, SacMod has been observing the developments and discussions surrounding the proposed plans to demolish and redesign parts of the historic neighborhood that were designed and constructed between 1958 and 1965 by Wurster, Bernardi and Emmons, Edward Larrabee Barnes, Vernon DeMars and Donald Reay, Lawrence Halprin, et al.

SacMod is a 501(c)(3) non-profit organization founded in 2010; we are dedicated to preserving modern art, architecture, and design in the Sacramento region. We do this by conducting home tours, bike tours, walking tours, film screenings, preservation campaigns, publications, and educating the public about modernism.

We have extensively researched the original design of the neighborhood where the Commons project is being planned. Accordingly, we have conducted several site visits and examined various documents, reports, and archives. We believe the original design is an iconic and irreplaceable example of mid-20th century architecture. In particular, the individual elements — the low-rise apartments, the high rise building, the sculptural wall by Jacques Overhoff, and the overall master plan and its key position and contribution to urban renewal and redevelopment — comprise a residential community that is not

A 501(c)(3) non-profit organization dedicated to promoting, preserving and protecting modern art, architecture and design in the Sacramento region.

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only an historic resource but is unique and unlike any other neighborhood in Sacramento.

We are unequivocally opposed to the proposed Commons project. The planned demolition and redesign of the neighborhood will have devastating impacts on numerous levels. Because of the scope and magnitude of the proposed Commons project and its impacts, especially on an historic site, we assert the project should be evaluated through the Environmental Impact Report (EIR) process, not through the accelerated SCEA process.

The existing historic neighborhood has already proven to be a beautiful and successful example of a pedestrian and bicycle-friendly mixed-use community — which was designed at the human scale with open, park-like green spaces and gathering places.

We further urge that:

- 1) the investors/developers and their contractors choose a more appropriate site, and;
- 2) the City recognize the targeted buildings, structures, landscaping and master plan as historic resources so that they receive the proper stewardship they merit.

BACKGROUND

Kennedy Wilson (KW), a real estate investment services company, purchased the neighborhood mid-2012. In December 2013, KW presented their plans to demolish and rebuild parts of the neighborhood to increase density. KW has hired contractors, including AECOM (Architecture, Engineering, Consulting, Operations, and Maintenance) who is also involved in the Sacramento Entertainment and Sports Complex (Arena).

On February 18, 2014, SacMod board members attended a public meeting during which representatives from KW and AECOM discussed their proposed plans. They articulated proposed changes to the existing Capitol Tower neighborhood that included:

- resurfacing the historic Capitol Tower with a new “skin”;
- demolishing all of the historic low-rise “villa” apartments;
- adding a 20-22 story condo / hotel tower;
- adding two 22 story towers;
- adding four large L-shaped six story mid-rises and a separate six-story mid-rise with a smaller footprint (for a total of five mid-rises);
- adding parking at the rate of one space per unit, at ground level and up;
- using a “podium plan” - everything will be from the ground up with a vertical emphasis;
- increasing the number of living units from 409 to 1600.

HISTORIC RESOURCES

Capitol Tower and Garden Apartments were designed and built from approximately 1958 to 1965. This mid-20th century downtown neighborhood includes the interplay of

high-rises, individual low-rise garden apartments, and open space urban planning with park-like green spaces, recreational areas, and car-free bicycle and pedestrian areas.

The caliber of talent from renowned modern masters involved in the original design of this historic neighborhood is impressive. Capitol Tower and Garden Apartments was among the earliest large-scale redevelopment projects for most of these architects, and it includes many of the thoughtful design principles that characterize each of their most celebrated works. All of the architects involved in the project received the distinction of being a Fellow of the American Institute of Architects (FAIA) — and some were even bestowed the highest honor, a Gold Medal (GM):

Project Architects

- Wurster Bernardi and Emmons

- William W. Wurster, FAIA and GM
- Theodore C. Bernardi, FAIA
- Donn Emmons, FAIA
- Karl E. Treffinger, FAIA

- Edward Larrabee Barnes, FAIA and GM

- DeMars and Reay

- Vernon A. DeMars, FAIA
- Donald P. Reay, FAIA

Associate Architects

- Mayer, Whittlesey and Glass

- Albert Mayer, FAIA
- Julian H. Whittlesey, FAIA
- M. Milton Glass, FAIA

- Dreyfuss + Blackford Architects

- Albert Dreyfuss, FAIA
- Leonard Blackford, FAIA

Landscape Architect

- *Lawrence Halprin*, Fellow and Gold Medal Recipient, ASLA (American Society of Landscape Architects)

Artist

- *Jacques Overhoff*. sculptural wall (1961)

Please note that SacMod has been advised by the City that the Overhoff sculptural wall is classified as a “structure.” While the narrative on page 2 of the March 2014 Draft entitled “Sacramento Commons PUD Guidelines” (Draft PUD) indicates that KW intends to retain the wall on-site, SacMod is very concerned that the wall is not adequately protected. We caution against any potential harm should there be an attempt to relocate

it and ask there be appropriate consults and studies conducted by experts should such an attempt be made.

We are also alarmed by and opposed to KW's plans to modify the historic, elegant, and timeless design of the Capitol Tower apartment building by adding a new "skin."

The original design of the neighborhood received international attention from leading architectural publications as well as awards and accolades, including:

- 1959: "First Design Award: Urban Design Project - Wurster, Bernardi & Emmons; Edward L. Barnes; DeMars & Reay. *Progressive Architecture*.
- 1962: "First Design Award: Diversifying Redevelopment" - Wurster, Bernardi & Emmons; Edward L. Barnes; DeMars & Reay. *Progressive Architecture*.
- 1962: Honorable Mention: *House & Home - Life - American Institute of Architects* Homes for Better Living Awards Program.
- 1963: Merit Award, American Institute of Architects Northern Chapter.
- 1964: First Honor Award, Urban Renewal Design Honor Awards Program; United States Urban Renewal Administration.
- 1966: Governor's Design Award (Edmond G. Brown) - Urban Buildings category.
- 2001: Illustrative example of "Smart Growth" and fostering a walkable, close-knit neighborhood by the PLACE³S Program/The California Energy Commission with support from McKeever/Morris, a division of Parsons Brinkerhoff.

The historic significance of the neighborhood is not just limited to buildings, structures, and landscaping. The neighborhood is a prime example of mid-20th century redevelopment and urban renewal national trends reflecting the early hope and optimism that well-designed progressive housing could revive deteriorating city centers. The neighborhood also embodies forward-thinking urban planning principles. The resulting design incorporated "open-space" planning with "mixed-use" — and has been car-free, pedestrian friendly, and near a transportation hub from the onset.

We believe Capitol Tower and Garden Apartments qualifies as a historic resource under CEQA. The EIR should treat the site as historic and evaluate feasible preservation alternatives that avoid or reduce significant impacts. Please refer to SacMod's "Fact Sheet" (enclosed) for additional details regarding the people involved in designing and building the historic neighborhood.

EXISTING NEIGHBORHOOD ALREADY MEETS TPP QUALIFICATIONS

The City's NOP Notice dated April 8, 2014 defines the Commons project as "a residential mixed-use project proposed on an approximately 10-acre infill site in downtown Sacramento located within close proximity to a variety of transit resources and is designed to qualify as a transit priority project (TPP). Pursuant to California Public Resources Code section 21155(b), a TPP must meet the following requirements: (1) the project must contain at least 50 percent residential use based on total building

square footage; (2) the project must have a minimum net density of 20 dwelling units per acre; and (3) the project must be located within one-half mile of a major transit stop or high quality transit corridor included in the regional transportation plan.”

According to our calculations, the existing historic neighborhood *already* meets the TPP qualifications. It therefore is of little significance that the Commons project espouses to achieve TPP goals. Public policy should not reward the destruction of one TPP site for the creation of another. The net effect would be an increase, not decrease, in greenhouse emissions (as opposed to developing a TPP in an otherwise noncompliant location).

SacMod therefore takes issue with the misuse of the TPP procedure being applied to the Commons project. SacMod also objects to the project being categorized as an “infill” project. We feel these are highly misleading and inappropriate applications of the law.

Relevant to the Commons project’s goal of increasing density, SacMod is calling on the City to ask KW to disclose monthly occupancy rates since they purchased the property in 2012.

“SUSTAINABILITY” AND “INNOVATION”

There is nothing less sustainable than destroying perfectly good, historic buildings. Simply adding density after demolishing a livable community does not make a project more sustainable.

The Commons project is not a “sustainable communities project” as that term is defined in California Public Resources Code section 21155.1. The Commons project exceeds the land use criteria specified in subsection (b) of that statute, which limits projects to 8 acres and 200 residential units, amongst other criteria. More importantly though, the existing site is an historical resource. The Commons project will have a significant impact, indeed a destructive impact, on the existing historic resource. Quite disingenuously, the Commons project essentially seeks to avail itself of the benefits conferred on sustainable communities through the destruction of an historic and architecturally significant site that managed to achieve the goals and benefits of a sustainable community long before such classification was statutorily conceived. Fortunately, California Public Resources Code section 21155.1(a)(5) expressly denies implementation of the sustainable communities strategy for this project. As such, the City may not use the Sustainable Communities Environmental Assessment (SCEA) in lieu of the CEQA process.

Additionally, SacMod has not yet seen any demonstrable evidence of innovation in relation to the proposed Commons project. When directly asked what innovations and sustainable elements the project incorporated, KW representatives were unable to articulate anything beyond meeting bare minimum standards and legal requirements. Merely labeling a project sustainable and innovative does not necessarily make it so.

Many of the proposed concepts for the Commons are simply a repackaging and reselling of attributes and amenities that already exist or can be further enhanced on the historic site.

PROJECT ELEVATIONS, PERSPECTIVES, SHADOW STUDIES

Thus far, KW has only submitted plan views and idea boards of their proposed Commons project. Design elevations and perspective drawings have been conspicuously absent.

SacMod urges the City to require that KW to produce proper elevations and perspective drawings so the impact of buildings and mass in the neighborhood and areas adjacent to the neighborhood are well-understood.

Furthermore, it is imperative that these visualizations include hourly shadow studies so that the impact of the proposed buildings and mass are apparent to everyone.

TREES

A tally of the overall number and quality of *existing* trees versus the number and quality of anticipated trees after the project is completed seems in order.

SacMod's research indicates that extraordinary measures by the original design team were taken to preserve pre-existing trees on site. The Commons project should not harm Sacramento's urban tree canopy, which is a vitally important contributor to cooling Downtown's microclimate.

STEWARDSHIP

While the fate of the historic neighborhood is being decided, SacMod calls upon the City to ensure that KW proactively maintain and provide necessary repairs to the neighborhood so that "demolition by neglect" does not occur.

VIABLE PROJECT ALTERNATIVES

1) KW can embrace and respect the existing historic design and become an award-winning example of historic stewardship.

2) KW can build the project elsewhere in a vacant or available lot that needs enhancement, thereby fulfilling the goals envisioned and promoted by TPP and infill policies.

3) KW can add density in a manner that is respectful to the historic design and original master plan.

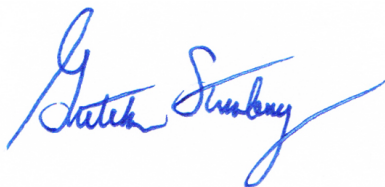
4) KW can meet expressed objectives in the Draft PUD by using already existing historic assets or by adding amenities to the existing historic assets. In particular, the concepts and ideas delineated on: page 10 (“Community Objectives”); page 13 (“Planning and Site Design” and “Buildings and Landscaping”); page 18 (“Landscape Open Space Concepts”); page 22 (“Active Ground Floor Uses”); page 28 (“Live Work...”); page 32 (“Bicycle Parking Standards”); and page 44 (“Landscape Design” and its subcategories) — can be achieved by enhancing what is there, not destroying it.

As a matter of fact, the majority of ideas expressed in the Draft PUD either already exist at the site or can be accomplished without demolition or destruction of the historic buildings, the historic structures, the historic landscaping, and the historic master plan.

In closing, SacMod urges that the City deny approval of the Sacramento Commons project. In the excitement surrounding the Arena plans and consequent rush to densify downtown, this neighborhood has been inappropriately targeted. It does not make sense to destroy the most beautiful, functional, and successful residential community downtown. This historic residential neighborhood remains unparalleled in the architectural talent and planning principles it embodies even to this day. Furthermore, we believe the neighborhood is mis-categorized as an “infill” project and already exemplifies the very core concepts the Commons project is seeking to achieve. The neighborhood is already walkable, livable and desirable; why ruin a perfectly nice place to live?

SacMod would like to offer technical assistance regarding the historical aspects of the site and invites consults regarding historic stewardship.

Respectfully submitted,



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In conjunction with the SacMod Board of Directors:

Dane Henas, Vice President
Nick Vinciguerra, Secretary
Zann Gates, Treasurer
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Jon Hill, Director At-Large

cc:

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