

April 20, 2015

Submitted via e-mail

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**Re: Draft Environmental Impact Report for the Sacramento Commons Project
(P14-012) (SCH#2014042032)**

Dear Mr. Johnson:

On behalf of Sacramento Modern (SacMod), thank you for the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the Sacramento Commons Project (Sacramento Commons).

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, researching, writing, and educating the public about modernism.

Capitol Towers is a historic district pursuant to Federal and State law. Since the Notice of Preparation for Sacramento Commons in September 2014, Capitol Towers Historic District has been formally determined eligible to be listed on the National Register of Historic Places and is on the California Register of Historical Resources. The City of Sacramento Preservation determined it should be a landmark and voted in favor of placing it on the Sacramento Register of Historic and Cultural Resources.

Capitol Towers Historic District was built from 1959 to 1965. The award-winning original design for this rare and intact mid-20th century established community includes the interplay of high-rises, individual low-rise garden apartments, green spaces, recreational

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areas, and car-free bicycle and pedestrian areas. It is an urban oasis and early example of mixed-use development in the heart of downtown Sacramento.

Capitol Towers has been acclaimed for its thoughtful and people-oriented design and planning features from conception through completion. It was the first redevelopment project constructed by many of its talented design team that included Wurster, Bernardi, and Emmons, Edward Larrabee Barnes, DeMars & Reay, and Lawrence Halprin, and reflects their social and aesthetic philosophies. In particular, Capitol Towers embodies the design and planning approach of Wurster, Bernardi, and Emmons applied to a large urban property, and is considered by Lawrence Halprin to be his first urban plaza.

But Capitol Towers Historic District is more than a collection of low-rises, a high-rise, trees, landscaping, and the sculptural wall. It is more than the impressive list of master architects and the designers involved in making it. It is a beautiful and intact neighborhood that continues to be successful even 50 years after it was completed. It includes open, park-like green spaces and gathering places. It is a historic district worth preserving for future generations to experience and enjoy. The neighborhood is already one of the most densely populated residential areas in downtown Sacramento.

Sacramento Commons disingenuously and incorrectly identities itself as a “sustainable communities project” while eviscerating Capitol Towers Historic District. The proposed project as described in the DEIR violates local, state, and federal public policies and needlessly exposes taxpayers to litigation arising out of these violations.

Furthermore, the cornerstone of Sacramento Commons DEIR relies on Sacramento Area Council of Government (SACOG)’s “Consistency Determination” letter — which fails to take into account the historical resources on site and pre-dates the formal finding that Capitol Towers has been determined eligible to be listed as a historic district on the National Register of Historic Places and is listed on the California Register of Historical Resources.

Sacramento Commons uses greenwashing to sell the wrong product in the wrong place. The Applicant, Kennedy Wilson, is unlikely to deliver the currently proposed project after receiving entitlements and flipping the properties pursuant to its track record.

Capitol Towers Historic District is a thriving, vibrant, established community that already embodies the standards, principles, and intentions that Sacramento Commons seeks to achieve. The buildings are inhabited, recently rehabilitated, and fully economically viable.

The items set forth in the DEIR for Sacramento Commons *must* be considered in light of the neighborhood’s historical status. Sacramento Commons' planned demolition and redesign of the historic district will have devastating impacts on numerous levels that *CAN and SHOULD be avoided*.

Capitol Towers Historic District and neighborhood's density units per acre, according to our calculations, is 59.8. This is remarkably close to complying with the Central Business District minimum density of 61 units pursuant to the 2030 General Plan that is intended for *new* developments. As a matter of fact, Capitol Towers Historic District and neighborhood is *already* one of the densest areas of downtown Sacramento, second only to Sacramento County Jail, according to U.S. Census data. Sacramento Commons seeks to shoehorn more density in an area that essentially conforms with the 2030 General Plan.

Capitol Towers Historic District already meets or can accommodate Sacramento Commons DEIR's project objectives without demolition. In particular, the project objective of adding further density can be achieved on site *without* harming the majority of historical resources. Wedging more density by destroying viable housing stock in a historic district does not make sense. Why would the City be in favor of destroying the second most densely populated area in downtown Sacramento?

Furthermore:

- 1) there are dozens of other projects that have received entitlements by the City that achieve the City's goal of density. SacMod counted a total of at least 26,146 new or entitled units in or close to Central City and another 21,946 units nearby in Natomas, South Sacramento, and West Sacramento;
- 2) there are other more suitable sites — that do not contain an established historic district and park neighborhood — that would benefit from such development.

For instance, "The Docks" area would be an ideal location for Sacramento Commons due to its proximity to the waterfront and the proposed streetcar line.

Sacramento Commons DEIR's version of mitigation — retaining the existing Tower, relocating the sculptural wall and recordation with various interpretive plaques and exhibits after the demise of Capitol Towers Historic District — is insufficient. This very type of mitigation has been successfully challenged in court. "Documentation of the historical features of the building and exhibition of a plaque do not reasonably begin to alleviate the impacts of its destruction. A large historical structure, once demolished, normally cannot be adequately replaced by reports and commemorative markers." *Architectural Heritage Association v. County of Monterey*, 122 Cal.App.4th 1095, 1119 (2004), quoting from *League for Protection of Oakland's etc. Historic Resources v. City of Oakland*, 52 Cal.App.4th 896, 909 (1997). The gross inadequacy of the Applicant's proposed mitigation here is perhaps best stated in *Architectural Heritage Association*, supra, 122 Cal.App.4th at 1119:

"As drawing a chalk mark around a dead body is not mitigation, so archival documentation cannot normally reduce destruction of an historic resource to an insignificant level."

Simply put, Applicant does not seek to mitigate negative impacts on a historic district, it eradicates any sense of community, neighborhood, or civic pride. It destroys a uniquely “Sacramento” style of city living that continues to serve as the model for an urban core.

According to CEQA law — as it *correctly* applies to Sacramento Commons — project alternatives *MUST* be carefully examined. During the CEQA process it is incumbent upon the City to provide the necessary leadership, guidance, and commitment to ensure that CEQA law is upheld. Design problems warrant design solutions. Preservation *and progress* can be achieved at the same time through compromise and ingenuity.

Background

Kennedy Wilson (KW / Applicant), a real estate investment services company, purchased Capitol Towers around May 2012. In December 2013, KW presented their plans to demolish and rebuild parts of the neighborhood. KW hired agents, including AECOM (Architecture, Engineering, Consulting, Operations, and Maintenance) to assist with the entitlement process.

On February 18, 2014, SacMod board members attended a public meeting during which representatives from KW and AECOM discussed their proposed plans to develop the Capitol Towers neighborhood into “Sacramento Commons.” During this meeting, KW refused to have a meaningful dialogue with residents of the neighborhood and community about their concerns, which included a clear advisement on the existence of historical resources from members of the preservation community.

KW’s perfunctory meetings to announce the Sacramento Commons project without allowing for meaningful input and dialogue has resulted in opposition from neighborhood residents and the preservation community.

In the following months, KW and its agents have continued to misinterpret and abuse CEQA law in an effort to dismiss and deny that Capitol Towers contains historical resources.

SacMod is opposed to the specific proposed actions listed in the March 2015 DEIR and Draft Planned Unit Development (PUD) Guidelines to:

- demolish the historical low-rise apartments and the majority of the established tree canopy;
- re-zone the historic district;
- chop the historic district into six smaller and separate parcels;
- relocate the historical sculptural wall by artist Jacques Overhoff; and
- significantly alter the historical high-rise’s appearance.

Despite unanimous validation from the Keeper of the National Register, the California State Historical Resources Commission, and the City’s Preservation Commission and

Director, Sacramento Commons' DEIR refuses to fully acknowledge Capitol Towers Historic District, citing that "experts disagree."

Of note, the only voice of disagreement is a discredited historical analysis — by the Applicant's hired historical consultant.

In fact, the proposed Sacramento Commons project will:

- destroy a highly successful established community and model for livable downtown housing that is densely populated, high-occupancy, and has been mixed-use for over 50 years. Applicant has a demonstrated track record of flipping properties and virtually no demonstrated track record of development.
- displace hundreds of middle income renters in favor of higher income renters, forcing them to the suburbs and facilitating longer commutes. This paradoxically will result in a net increase in greenhouse gasses, not a decrease as the project's proponents claim.
- negatively impact the quality of life for seniors and persons with disabilities who live in adjacent buildings in the neighborhood.
- destroy the majority of the property's urban tree canopy of old growth trees which is critical for the health and well-being of all city residents and visitors. These trees are a vital contributor to cooling Downtown's microclimate and help remove pollution.

In essence, Sacramento Commons decimates Capitol Towers Historic District — an established park neighborhood and successful pedestrian / bicycle-friendly mixed-use residential community. Capitol Towers Historic District's award-winning design includes large open vistas and park-like green spaces / gathering places — unlike what is being proposed by Sacramento Commons. Of note, most of Sacramento Commons' purported improvements and amenities already exist in Capitol Towers Historic District or can be easily added without wasteful and needless demolition.

Alternatives that respect the District's historical resources *MUST* be considered.

Capitol Towers Historic District is eligible for and should receive recognition by the City of Sacramento City Council as a local landmark by placing the district on the Sacramento Register of Historic and Cultural Resources so that it obtains the proper stewardship it merits.

Capitol Towers Historic District's Status Has Been Firmly Established at Local, State, and Federal Levels — and Among National Experts

Even though DEIR 4.4-17 states “While disagreement exists between historical experts concerning the historical value of the project site,” there is overwhelming evidence of consensus and agreement among numerous experts that Capitol Towers is a historic district. In fact, there is unanimous validation among experts at local, state, and federal levels — and among national experts and organizations — as demonstrated below:

- 1) On August 20, 2014, the analysis within the evaluation by Applicant's historical expert JRP Historical Consulting, LLC, was unanimously and vociferously discredited by architects and professional historic preservationists during [testimony at the City of Sacramento's Preservation Commission](#).
- 2) On October 16, 2014, the City of Sacramento's Preservation Commission wrote a letter to Mayor Kevin Johnson that stated: “After reviewing the nomination and hearing public testimony, the Commission voted unanimously to send a letter in support of the nomination of Capitol Towers for listing in the National Register of Historic Places.”
- 3) On November 7, 2014, the California State Historical Resources Commission unanimously determined that Capitol Towers is eligible to be listed on the National Register and forwarded their findings to the Keeper of the National Register.
- 4) On December 31, 2014, the Keeper of the National Register determined that Capitol Towers was eligible for the National Register of Historic Places (National Register).
- 5) On January 16, 2015, California State Historic Preservation Officer Carol Roland-Nawi wrote: “As a result of being determined eligible for the National Register, this property has been listed in the California Register of Historical Resources, pursuant to Section 4851(a)(2) of the California Code of Regulations.”
- 6) On February 19, 2015, the City of Sacramento's Preservation Director: “held a public hearing, reviewed the nomination application submittal materials, took public comments, and:
 - “made a preliminary determination regarding the eligibility of the resources, concurring with the nomination proposal, that Capitol Towers is eligible for listing in the Sacramento Register as a Historic District, including the proposed Contributing Resources;
 - nominated the Capitol Towers as a Historic District including its' Contributing Resources for listing in the Sacramento Register, to be forwarded to the Preservation Commission for its consideration and recommendation to the City Council;

- made recommendations, to be forwarded to the Preservation Commission, regarding the significant features or characteristics of the nominated resources; and,
- forwarded the nomination to the Preservation Commission for its consideration and recommendation to the City Council on the nominated historic district, contributing resources, and features and characteristics, for listing in the Sacramento Register....”

7) On April 15, 2015, the City of Sacramento Preservation Commission:

- determined Capitol Towers Historic District should be a landmark and voted in favor of placing it on the Sacramento Register of Historic and Cultural Resources;
- voted against the applicant’s request for demolition;
- recommend that the City of Sacramento Planning and Design Commission deny approval for the Sacramento Commons as it is currently written. In particular, the Preservation Commission determined that project alternatives should include decreased density options and alternative sites.

In addition to Capitol Towers Historic District being vetted at four levels of expert review as outlined above, there is additional consensus from multiple national experts and organizations.

This includes letters of support for Capitol Towers Historic District from experts such as:

- Barry Wasserman, FAIA; Former California State Architect; Professor Emeritus, California State Polytechnic University, Pomona, Department of Architecture.
- Wayne Donaldson, FAIA; appointed in 2010 by President Barack Obama as Chairman of the National Advisory Council on Historic Preservation.
- Richard Peters; FAIA; Professor Emeritus of Architecture at the University of California, Berkeley; noted author and expert on the work of William Wurster.
- Charles Birnbaum, FASLA, FAAR; coordinator of the National Park Service Historic Landscape Initiative (HLI); noted author and landscape historian; Visiting Professor at the Columbia University Graduate School of Architecture Planning + Preservation.
- Alan Hess, AIA; noted author and architectural historian.
- Pierluigi Serraino, AIA; noted author and architectural historian.

Their letters — and other letters of support — are attached to this response.

Additional facts and information regarding Capitol Towers Historic District can be found

in an article, “Capitol Towers - Sacramento’s Modernist Gem,” published Winter 2015 in California Garden & Landscape History Society’s quarterly journal, *Eden*. (Also attached.)

This article was written by Flora Chou, LEEP AP, and national board member of Docomomo US, the United States chapter of Docomomo International, a non-profit organization dedicated to the documentation and conservation of buildings, sites and neighborhoods of the modern movement. Ms. Chou also wrote the nomination for Capitol Towers Historic District that was accepted by the Keeper of the National Register.

Capitol Towers Historic District Includes Landscaping and Additional Contributing Elements

The historical resources in Capitol Towers Historic District are not simply limited to buildings. The site’s landscape design is also an integral part. The District also includes contributing resources such as:

- the central plaza;
- secondary courtyards;
- landscape courts;
- small scale features;
- swimming pool;
- circular fountain;
- spatial organization;
- building placement and relationships;
- circulation;
- landscape features;
- views and vistas; and,
- the sculptural wall by Jacques Overhoff;

Sacramento Commons’ proposed move of the historical sculptural wall is unnecessary and exposes it to the potential for irreparable damage. SacMod cautions that potential harm may occur should there be an attempt to relocate it, and asks the Applicant and City to provide appropriate expert consultations before such an attempt is made.

Tree Canopy

Sacramento Commons removes the majority of Capitol Towers Historic District’s greenspaces and trees — and replaces it with cement and younger, and less robust vegetation.

The tree canopy is the first Sacramento asset that Mayor Kevin Johnson mentions in his [“Mayor’s Message” on the City of Sacramento’s website](#):

“... We have so much to be proud of, like our unique and diverse neighborhoods, our thousands of beautiful trees....”

On September 4, 2014, Ray Tretheway, President of the Sacramento Tree Foundation wrote to the Planning and Design Commission:

“The City of Sacramento needs to aggressively address Urban Heat Island effects through the expansion and protection of our urban forest canopy. The 10 warmest years on record have occurred since 1998 (NOAA State of the Climate Global Analysis 2012). To address this trend, the City needs to redouble its efforts to aggressively mitigate and reduce the adverse impacts of Urban Heat Islands. These impacts include air quality issues, water and energy usage and public health issues. An aggressive expansion of our urban tree canopy will make direct contributions to the long-term livability of our city and the health of all city residents....”

We desire a City where greenspaces and trees are valued for the benefits they provide and are planned for as part of the city’s infrastructure. Green spaces and green canopy create a sense of calm and sense of place, making city life more sane and secure.

Infill development is important but should not occur at the expense or elimination of the City’s richest, defining legacy: the greenspaces and tree canopy that defines the essence of our public realm....”

SacMod’s research indicates that extraordinary measures by the Capitol Towers Historic District design team were taken to preserve pre-existing heritage 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. [Trees help remove pollution](#), which is an important public health benefit. In a recent article, the research and innovation director for the Sacramento Tree Foundation recently explained the [additional public benefits associated with our urban trees](#).

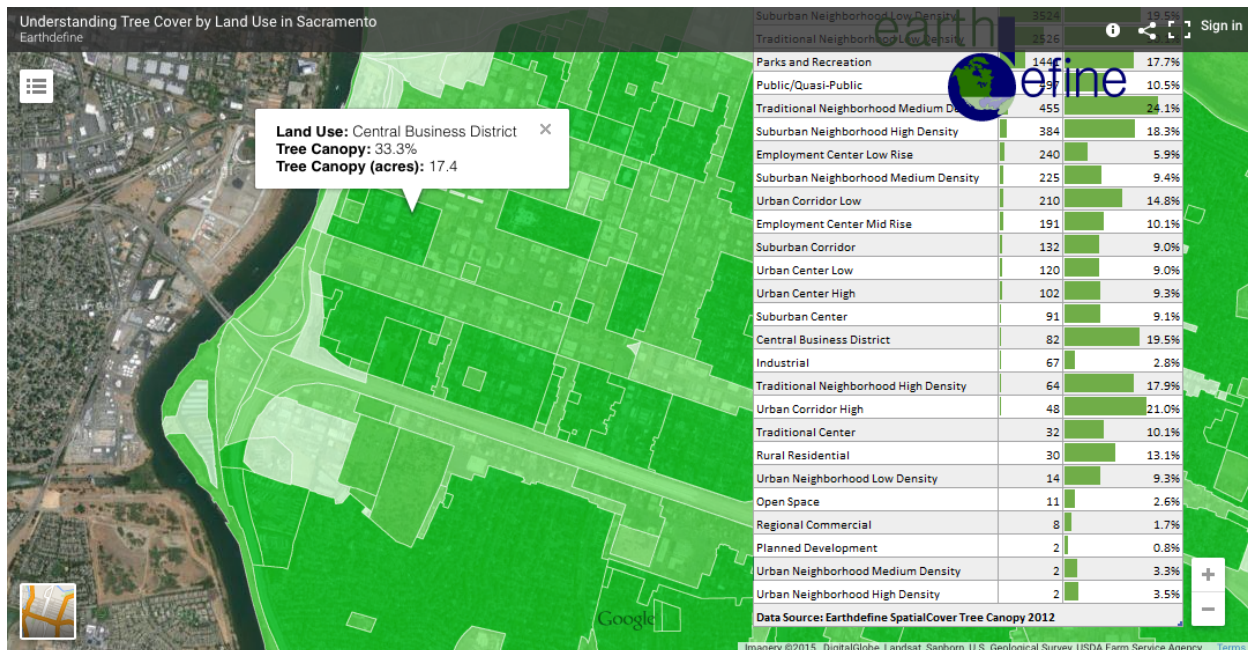
[Testimony from a former City of Sacramento Arborist for Urban Forest Services at the July 24, 2014 City of Sacramento’s Planning and Design Commission](#) should receive full attention. The arborist warned that Sacramento Commons, as planned, would create a substantial impact on the environment by creating an urban heat island. The removal of over 200 trees (including heritage trees) on site would result in the loss of oxygen and public health benefits. The arborist also pointed out that replacement trees have failed to thrive in other Sacramento developments and therefore are not an effective alternative/mitigation strategy.

“Understanding Tree Cover by Land Use in Sacramento”

According to [Earthdefine](#), Capitol Towers Historic District, located in the Central Business District, has a tree canopy of 33.3%. Per Earthdefine’s “Understanding Tree Cover by Land Use in Sacramento,”:

“Sacramento’s urban forest covers 16.5% of its area with a total tree canopy cover of 10,506 acres. This map shows the distribution of tree cover between different land use classes. Suburban low density neighborhoods contain most of the trees in Sacramento while traditional low density neighborhoods have the highest average percent tree cover. The table lists the average values for tree cover for each land use class.”

Per Earthdefine, the urban forest coverage for the Central Business District is 19.5%.



Why would the City of Sacramento be in favor of destroying the 33.3% tree canopy and park neighborhood in Capitol Towers Historic District?

Sacramento Commons is NOT Exempt From Full CEQA Review

SacMod challenges the misinterpretation of CEQA law by the Applicant and Applicant’s agents. Sacramento Commons inappropriately categorizes as a Sustainable Communities project but it does not qualify.

Nor does the Sacramento Commons project meet the criteria for housing infill. Thus, the project does not qualify for or comply with the streamlining provisions for “infill projects” set forth in CEQA law.

This project must bear the full scrutiny and review mandated by CEQA law. There is no applicable exemption to CEQA for this project.

Sacramento Commons is NOT a Sustainable Community Project (Public Resources Code Sections 21155, et seq., do NOT Apply)

Applicant improperly seeks to characterize this project as a “transit priority project” (TPP) under Public Resources Code Sections 21155, et seq., in an attempt to evade application of CEQA law. Sacramento Commons is not a TPP. Capitol Towers Historic District and neighborhood — as it was built over fifty years ago — *already* meets TPP qualifications.

As attorney Brian Turner with the National Trust for Historic Preservation (NTHP) correctly points out in his Notice of Preparation letter to the City dated September 5, 2014 (Attached): “The square footage, density, and proximity to a major transit facility already qualify this existing development as a Transit Priority Project.”

It therefore is of little significance that Sacramento Commons 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).

Sacramento Commons essentially seeks to avail itself of the benefits conferred on a TPP through the destruction of a historical and architecturally significant site that managed to achieve the goals and benefits of a TPP long before such classification was statutorily conceived.

Moreover, even if Sacramento Commons was considered a TPP, the project is not exempt from CEQA law because it has a significant effect on a historical resource (destruction of Capitol Towers Historic District and neighborhood). Pursuant to Public Resources Code Section 21155.1, a TPP project may be exempt from CEQA law ONLY IF it meets certain specifically defined criteria. One such criteria is that the project “not have a significant effect on historical resources pursuant to Section 21084.1.” Public Resources Code Section 21155.1(a)(5).

Pursuant to Section 21084.1, the project site is deemed a historical resource as a result of being listed in the California Register of Historical Resources.

Public Resources Code Section 21084.1 specifically states: “A project that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment. For purposes of this section, an historical resource is a resource listed in, or determined to be eligible for listing in, the California Register of Historical Resources.”

The Sacramento Commons project most certainly has a significant effect on historical resources. Therefore, Public Resources Code Section 21084.1 prevails and makes the project ineligible to be a Transit Priority Project.

Finally, if the Sacramento Commons project is considered a TPP, which it assuredly is not, it is NOT a sustainable communities project. The project site exceeds the maximum acreage (8 acres) to qualify as a sustainable community. Public Resources Code Section 21155.1(b)(1). The project also exceeds the maximum residential units allowed by law (200 units). Public Resources Code Section 21155.1(b)(2). And it appears that Sacramento Commons will result in a net loss of affordable housing, contrary to the goals and requirements set for sustainable communities. Public Resources Code Section 21155.1(b)(3). A sustainable communities project must also assure adequate levels of low-income housing (20%) and/or open space (5 acres per 1,000 residents); assurances not made by Applicant here. See Public Resources Code Section 21155.1(c). Therefore, Sacramento Commons is NOT an exempt sustainable communities project.

Sacramento Commons is NOT an Infill Project Entitled to Special Streamlined CEQA Review (Public Resources Code Section 21159.21, et seq., do NOT Apply)

Public Resources Code Sections 21159.21, *et seq.*, provide streamlined environmental review for certain housing projects. Applicant improperly seeks to avail itself of the streamlined review procedures provided for in the Act. But even the most cursory review of the statute makes clear that it does not apply to Sacramento Commons. As with the TPP exemption, streamlined review is available ONLY IF: “The project does not have a significant effect on historical resources pursuant to Section 21084.1.” Public Resources Code Section 21159.21(g).

Again, this site is deemed a historical resource pursuant to Public Resources Code Section 21084.1 as a result of its listing on the California Register of Historical Resources. Thus, the special housing project exemption to CEQA law does not apply.

In complete disregard of the historical resource status of the project site, Applicant insists that Sacramento Commons is an infill project entitled to streamlined review under Public Resources Code Section 21159.24. Section 21159.24 is inapplicable where, as is the case here, the project fails to satisfy the initial criteria set forth under Section 21159.21. See Public Resources Code Section 21159.24(a)(3). Applicant cannot ignore the historic district’s status. Any exemption is negated as a result of Capitol Towers’ eligibility on the California Register of Historical Resources.

Even if Applicant was entitled to streamlined review under Public Resources Code Section 21159.24(a) — which it is not — new information relative to the historic eligibility of the site must be subject to CEQA review. See Public Resources Code Section 21159.24(b)(3). Applicant is not permitted to ignore the historical resources, nor may the City do so.

Finally, the project is not truly “residential” for purposes of streamlined review. Section 21159.24(d) defines “residential” as a project either consisting solely of residential units or residential with not more than 25% of the space dedicated to “primarily neighborhood-serving” businesses. Applicant readily admits the project is not intended solely for residential purposes. Nor though will the business use be “primarily neighborhood-serving.” It is believed and understood from on-site investigation conducted by SacMod that Applicant will force out most of the truly local businesses serving the needs of the residents and replace them with franchises aimed at generating business from customers off site and the greater downtown area.

Regardless of whether the project is residential, infill, transportation-oriented, or otherwise, the simple fact remains that this project is subject to the full scope of review afforded by CEQA law because Capitol Towers Historic District and neighborhood is a historical resource. Significant impacts to the historical resource, as intended by Applicant, must be mitigated.

Applicant is NOT Exempt From Considering Alternative Locations and Densities as Mitigation

In a final effort to avoid responsible stewardship of the historical resource, Applicant contends it need not consider offsite alternatives or changes in density to mitigate the significant impact the proposed project will have on Capitol Towers Historic District and neighborhood. [DEIR 5.1.1 “Pursuant to both Public Resources Code section 21155.2(c)(2) and 21094.5(b)(1) this EIR is not required to evaluate an offsite alternative even if adequate offsite locations were available and the project proponent could obtain control of such locations.”]

However, this too is a flawed assertion by the Applicant. It again seeks to rely upon sustainable communities classification as a basis for avoiding consideration of all means of mitigation. As previously discussed, the project does not qualify as a sustainable community project or TPP. Therefore, Public Resources Code Section 21155.2(c)(2) is inapplicable. Similarly, the offsite mitigation limitation provided for in Public Resources Code Section 21094.5 is intended to promote establishment of a sustainable community project. Offsite mitigation need not be considered IF “a sustainable communities environmental assessment could not be otherwise adopted.” Public Resources Code Section 21094.5(b). That is not an issue here, the site already qualifies as a sustainable community and TPP. If Applicant’s approach were adopted, every existing TPP could be readily altered, modified or destroyed regardless of the environmental and historical resource impacts under the guise of re-qualifying as a sustainable community. Nothing could be less sustainable.

Appendix A — SACOG’S “Consistency Determination” Letter — is Invalid on Numerous Counts

On December 8, 2014, SACOG (Sacramento Area Council of Governments) wrote that it determined that Sacramento Commons is “consistent” with the Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS) [Attachment 8 Appendix A of Sacramento Commons DEIR].

This determination is invalid because:

1. SACOG’s analysis, based on modified computations from a worksheet dated July 31, 2012, completely ignores the existence of the historical resources on the proposed Sacramento Commons project site;
2. SACOG’s letter pre-dates the Keeper of the National Register of Historic Places determination on December 31, 2014 that the site is eligible to be listed on the National Register and — consequently — is automatically listed on the California Register of Historical Resources.
3. SACOG’s determination relies on the misinterpretation of CEQA law by the Applicant and Applicant’s agents that inappropriately categorizes Sacramento Commons as a Sustainable Communities project.

Capitol Towers Historic District and Neighborhood Already Embodies the Standards, Principles, and Intentions that Sacramento Commons Seeks to Achieve

SACOG MTP/SCS

Capitol Towers Historic District and neighborhood — as it was built over fifty years ago — *already* meets the key “Blueprint” principles that are the foundation for the SACOG’s Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS).

These principles are:

- providing a variety of transportation choices;
- offering housing choices and opportunities;
- taking advantage of compact development;
- using existing assets;
- mixed land uses;
- preserving open space, farmland and natural beauty through natural resources conservation; and
- encouraging distinctive, attractive communities with quality design.

As NTHP Attorney Brian Turner notes in his September 5, 2014 letter to the City, Capitol Towers Historic District:

“... already embodies the seven interlocking principles of the Sacramento Area Council of Governments Blueprint including compact development, housing and transportation choices, mixed use development, quality design and conservation of natural resources....”

Former State Architect Barry Wasserman, FAIA, testified to the State Historical Resources Commission on November 7, 2014 that Capitol Towers is, in fact, an early and groundbreaking model for mixed use planning:

“When I was state architect and in charge of developing the Capitol area plan, which has received international recognition and has held up over the last 25 years, Capitol Towers was an example of the kind of residential development and spacial development that fit the climate that we used as a underpinning for all that we did afterwards.... One of the things that I emphasize as a teacher is the importance of the space between buildings being just as important as the buildings themselves. In this case, Wurster's buildings are significant because they really represent the architecture of Central California of that time. But the spaces between the buildings, the landscape design is absolutely an example of what we should be doing in the future. It's what we tried to do in the Capitol area, it's what I'd like to see continue in all sustainable development in Sacramento.”

Indeed, MTP/SCS 2035 Sacramento Area Council of Governments Draft Environmental Impact Report (Chapter 7 – Cultural Resources – Page 7-52) favors mitigation that acknowledges historic districts and adaptive re-use — something that Sacramento Commons DEIR refuses to consider:

“If avoidance of a significant architectural/built environment resource is not feasible, additional mitigation options include, but are not limited to, specific design plans for historic districts, or plans for alteration or adaptive re-use of a historical resource that follows the Secretary of the Interior’s Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitation, Restoring, and Reconstructing Historic Buildings. Adaptive re-use or other measures developed consistent with the Secretary of the Interior’s Standards will reduce impacts to a less than significant level unless such measures are unable to avoid materially altering the physical characteristics creating the resource’s historical significance in an adverse manner.”

2035 GENERAL PLAN

Capitol Towers Historic District and neighborhood — as it was built over fifty years ago — *already* meets standards for the 2035 General Plan for development in the Central Business District.

According to the 2035 General Plan Final MEIR dated February 24, 2015:

“In adopting the City of Sacramento 2035 General Plan, the City of Sacramento seeks to achieve the following objectives, consistent with the objectives stated in the current 2030 General Plan.

- **Character of Place.** Preserve and enhance Sacramento’s quality of life and character as a city with diverse residential neighborhoods, an extensive urban forest, and role as the center of California’s governance.
- **Smart Growth.** Encourage future growth in the city inward into existing urbanized areas and the central business district to foster infill development, as well as encourage density of development and integration of housing with commercial, office, and entertainment uses that fosters increased walking and reduced automobile use.
- **Live More Lightly.** Strive to meet the intent of Assembly Bill 32, California Global Warming Solutions Act of 2006, by reducing carbon emissions that contribute to global warming by encouraging “green” building practices, use of solar energy systems, and developing a land use pattern that supports walking, biking, and public transit.
- **Maintain a Vibrant Economy.** Support a diversity of business and employment opportunities by retaining existing and attraction of new businesses; maintain and expand recreational, arts, and cultural facilities; and nurture diverse community events and celebrations.
- **Healthy Cities.** Preserve and enhance land use patterns and densities that foster pedestrian and bicycle use and recreation through expanded parklands, sports, and athletic programming as well as provide incentives for expanding the availability of organic foods, and protecting residents from crime and natural or terrorist acts.
- **Sustainable Future.** Accommodate growth that protects important environmental resources as well as ensures long-term economic sustainability and health, and equity or social wellbeing for the entire community.”

Capitol Towers Historic District and neighborhood already embodies all of these core principles with its diverse housing choices; extensive urban forest; mixed-use planning and award-winning design for smart growth; high density; proximity to transit and car-free bicycle and pedestrian areas; open, park-like green spaces and gathering places.

In particular, SacMod would like to address the key issue of sustainability among the 2035 General Plan MEIR core policies: there is nothing less sustainable than destroying perfectly good, functional, historical buildings in an established community. Simply adding density after demolishing a livable community does not make a project more sustainable. Merely labeling a project sustainable does not necessarily make it so.

Many of the proposed concepts expressed in Sacramento Commons DEIR would result in an increase of energy and resource consumption — and are simply a repackaging and reselling of attributes and amenities that already exist or can be further enhanced on the historic site.

As NTHP Attorney Brian Turner notes in his September 5, 2014 letter to the City, Capitol Towers Historic District:

“... Indeed, the existing Capitol Tower and Garden Apartments offer an outstanding example of what is prescribed by the 2030 General Plan for development in the CBD: a mixture of mid- and high-rise sited to positively define the public streetscape, public parks and open space areas within walking distance of local residents, broad sidewalks appointed with appropriate pedestrian amenities, and consistent planting of street trees providing shade and enhancing character and identity.”

Additionally, Mr. Turner advised the City:

“The National Trust’s Preservation Green Lab has evaluated the environmental impacts of building reuse compared to demolition and new construction for a variety of building types, notably in our publication [The Greenest Building: Quantifying the Environmental Value of Building Reuse](#). This study found that building reuse typically offers significant environmental savings over new construction -- even when that new construction is energy efficient. Indeed, building reuse can offer climate change savings and reductions in resource depletion when compared to new construction.”

Per that study’s Executive Summary:

“It is often assumed that the CO2-reduction benefits gained by a new, energy efficient building outweigh any negative climate change impacts associated with the construction of that building. This study finds that it takes 10 to 80 years for a new building that is 30 percent more efficient than an average-performing existing building to overcome, through efficient operations, the negative climate change impacts related to the construction process.”

How will the City of Sacramento test the applicant’s assertion that the project is “sustainable” to make sure that there is factual evidence and expert scientific evaluation to support this claim?

DEIR Project Objectives were Already Met Before Sacramento Commons was Conceived

Capitol Towers Historic and neighborhood — as it was built over fifty years ago — *already* meets the Project Objectives outlined in Sacramento Commons DEIR:

The project objectives for the Sacramento Commons project are to:

- ▶ intensify an existing urban downtown residential community close to urban amenities (e.g., shopping, services, transit, entertainment, and cultural attractions);

Capitol Towers Historic District already achieves this goal, which can be further intensified without destroying historic resources.

- ▶ support investment and reinvestment in downtown Sacramento, particularly with provision of more residential uses;
- ▶ intensify an existing infill development project with a new project that includes additional residential uses near the major employment centers of downtown Sacramento;

These goals can be achieved through proactive stewardship of the existing Historic District consistent with the U.S. Secretary of the Interior's Standards for the Treatment of Historic Properties — and can be further intensified without destroying the majority of historic resources.

- ▶ provide high-density residential uses that utilize surrounding transit services and provide access to a variety of transportation modes;

Capitol Towers Historic District already achieves this goal.

- ▶ enhance pedestrian movement through the central portions of the project site;

Capitol Towers Historic District already achieves this goal, which can be further intensified without destroying historic resources.

- ▶ provide additional housing choices for Sacramento's diverse population, and supporting retail and other commercial services for the residents and guests of the proposed development;

Capitol Towers Historic District already has a large variety of housing choices and thereby achieves this goal.

- ▶ provide open space areas that support uses on-site and provide places for community gathering, activity, privacy, and connectivity;

Capitol Towers Historic District already achieves this goal.

- ▶ provide development that is consistent with the City of Sacramento's General Plan and the Sacramento Area Council of Governments (SACOG) Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS); and

Capitol Towers Historic District already achieves this goal.

- ▶ incorporate sustainability features that help the City and region achieve its sustainability targets, while enhancing the livability of the community.

This goal can be achieved without destroying the Historic District.

PUD Guideline Improvements and Amenities

Capitol Towers Historic District *already has* — or can easily integrate — the improvements and amenities touted by Sacramento Commons without destroying historical resources. These include: open promenades; gathering areas; street lighting, furnishings, amenities; public art; retail spaces; signage; specialty market; for-sale condos; water efficiency; energy efficiency; climate-appropriate planting; low-impact design features; retail kiosk; live-work units; fixed and movable seating areas; bicycle parking facilities; a rooftop garden; shade structure; and water run-off management.

Density of Capitol Towers Historic District and Neighborhood

Capitol Towers Historic District and neighborhood encompasses four city blocks.

It includes:

- 1) Capitol Towers Historic District - 409 units - 10.13 acres
(source: SacCommons DEIR)

Parcel 00603000040000
Parcel 00603000030000
Parcel 00603000020000
- 10.13 acres per DEIR

- 2) Bridgeway - 134 units (source: SacCommons DEIR)
Parcel 00603000070000 (42689 sq ft - source: SacCounty Assessor)
- 0.98 acres

- 3) Pioneer - 198 units (source: SacCommons DEIR)
Parcel 00603000050000 (55757 sq ft - source: SacCounty Assessor)
- 1.28 acres

Total Units = 741 units

Total Acres = 12.39 acres

Current units per net acre calculation = 59.8

This number — 59.8 for the established Capitol Towers Historic District and neighborhood — is remarkably close to complying with the Central Business District minimum density intended for new developments (61 units per net acre pursuant to the 2030 General Plan). As a matter of fact, Capitol Towers Historic District and neighborhood is *already* one of the densest areas of downtown Sacramento, second only to Sacramento County Jail, according to U.S. Census data.

Sacramento Commons seeks to shoehorn more density in an area that already and essentially conforms with the 2030 General Plan.

Why would the City be in favor of destroying the second densest area of downtown Sacramento?

City of Sacramento has Already Granted Entitlements Elsewhere to Achieve Density Objective

Table 1: SACRAMENTO COMMONS : COMPETING DENSITY PROJECTS *

Name	Location	# Units	Source
16 Powerhouse	16th & P	50	CADA
515 T Street	515 T Street	14	Sac. Business Journal
700 K Street	700 K Street	137	Sac. Business Journal
1500 S Street	1500 S Street	76	Sac. Business Journal
Whole Foods	21st & L	140	Sac. Business Journal
2500 R Street	2500 R Street	34	Sac. Business Journal
Broadway Triangle	39th & Broadway	29	Sac. Business Journal
Cathedral Square	11th & J	233	Sac. Business Journal
Crystal Ice Blocks	16th/17th & R	150	Sacramento Bee
Curtis Park Village	Sutterville & 24th Street	510	Petrovich Development
Downtown Plaza	5th/7th & J/K	550	Sac. Business Journal
Eviva	16th & N	118	Sac. Business Journal
Hall of Justice	813 6th Street	42	Sac. Business Journal
Hyatt Place (Marshall)	1122 7th Street	15	Sacramento Bee
i15	1431 I Street	96	Sac. Business Journal
La Valentina	12th & D	81	Domus Development
Legado de Ravel	16th & O	84	CADA
McKinley Village	East Sac/Bus I-80	336	McKinley Village
Mercy Housing	7th & H Streets	150	Sac. Business Journal
Pacifica Senior Artists	700 16th	160	Sac. Business Journal
Sutter Park	East Sac/F Street	125	Sac. Business Journal
Tapestri Square	2010 20th Street	58	Sac. Business Journal
The Arbors @ Oak Park	3820 Broadway	56	Sac. Business Journal
The Creamery	D & 10th	117	Sac. Business Journal
The Docks	Front Street	1155	City of Sacramento

(TABLE 1: CONTINUED FROM PREVIOUS PAGE)

Name	Location	# Units	Source
The Metropolitan	10th & J	320-380	Sac. Business Journal
The Mill @ Broadway	2630 5th	968	Thomas Law
The Ridgeway	912/914 12th Street	22	Sac. Business Journal
The River District (includes Township 9 + Twin Rivers)	south of the American River and north of the Railyards above Downtown Sacramento	8144	City of Sacramento
Union Pacific Railyards	north of Downtown and south of the River District	12000	Mosaic Partners
Warehouse Artists Lofts	11th & R	116	CADA

TOTAL # NEW / ENTITLED UNITS IN OR CLOSE TO CENTRAL CITY = 26,146

ADDITIONAL PROJECTS NEARBY *

Name	Location	# Units	Source
Delta Shores	I-5 & Beach Lake Road South Sacramento	5200	Merlone Geier
Mutual Housing	Stockton Blvd South Sacramento	120	Sac. Business Journal
Greenbriar	Natomas	3000	Thomas Law
North Natomas	Natomas	2119	City of Sacramento
Bridge District	West Sacramento	4000	The Bridge District
Capitol Yards	West Sacramento	270	City of West Sacramento
Delta Lane	West Sacramento	71-177	Sac. Business Journal
Landmark Lofts	West Sacramento	60	Sac. Business Journal
Pioneer Bluff incl Stone Locke	West Sacramento	5000 2000	SACOG

TOTAL # NEW / ENTITLED UNITS NEARBY = 21,946

* not necessarily complete lists; table data are known projects as of 4.15.15

Sacramento Commons DEIR is Inconsistent with City of Sacramento and Regional Policies

Sacramento Commons is inconsistent with the following City of Sacramento policies:

2030 General Plan Policy LU 1.1.5 Infill Development.

“The City shall promote and provide incentives (e.g., focused infill planning, zoning/ rezoning, revised regulations, provision of infrastructure) for infill development, redevelopment, mining reuse, and growth in existing urbanized areas to enhance community character, optimize City investments in infrastructure and community facilities, support increased transit use, promote pedestrian- and bicycle-friendly neighborhoods, increase housing diversity, ensure integrity of historic districts, and enhance retail viability.”

Capitol Towers Historic District is an established and successful mixed use residential community; pedestrian and bicycle-friendly; is already Transit Priority Project compliant; and is inhabited, recently rehabilitated, and fully economically viable. Why would the City be in favor of destroying an established and successful mixed use community that complies with the City’s goals as stated above?

2030 General Plan Policy LU 2.1.1: City of Neighborhoods.

“Recognizing that Sacramento’s neighborhoods are the basic living environments that make-up the city’s urban fabric, the City shall strive through its planning and urban design to preserve and enhance their distinctiveness, identity, and livability from the downtown core to well integrated new growth areas.”

2030 General Plan Policy LU 2.1.2: Protect Established Neighborhoods.

“The City shall preserve, protect, and enhance established neighborhoods by providing sensitive transitions between these neighborhoods and adjoining areas, and requiring new development, both private and public, to respect and respond to those existing physical characteristics, buildings, streetscapes, open spaces, and urban form that contribute to the overall character and livability of the neighborhood.”

Capitol Towers Historic District is an established park neighborhood. Does the City only believe this applies to single family homes? It should apply to apartment communities as well. Why would the City be in favor of destroying an established park neighborhood? Why wouldn’t the City be encouraging a sense of community and creating more civic pride that is associated with a historic district?

2030 General Plan Goal LU 2.3: City of Trees and Open Spaces.

“Maintain multi-functional “green infrastructure” consisting of natural areas, open space, urban forest, and parkland, which serves as a defining physical feature of Sacramento, provides visitors and residents with access to open space and recreation, and is designed for environmental sustainability.”

Sacramento Commons removes the majority of Capitol Towers Historic District’s 33.3% tree canopy with old-growth, established greenspaces and trees — and replaces it with cement and younger, and less robust vegetation. Why would the City of Sacramento be in favor of destroying the 33.3% tree canopy and park neighborhood at Capitol Towers Historic District?

2030 General Plan Goal LU 2.4: City of Distinctive and Memorable Places.

“Promote community design that produces a distinctive, high-quality built environment whose forms and character reflect Sacramento’s unique historic, environmental, and architectural context, and create memorable places that enrich community life.”

2030 General Plan Policy LU 2.4.1: Unique Sense of Place.

“The City shall promote quality site, architectural and landscape design that incorporates those qualities and characteristics that make Sacramento desirable and memorable including: walkable blocks, distinctive parks and open spaces, tree-lined streets, and varied architectural styles.”

2030 General Plan Policy LU 2.4.2: Responsiveness to Context.

“The City shall require building design that respects and responds to the local context, including use of local materials where feasible, responsiveness to Sacramento’s climate, and consideration of cultural and historic context of Sacramento’s neighborhoods and centers.”

Capitol Towers Historic District is an established, distinctive, and memorable community that reflects Sacramento’s unique historical, environmental, and architectural context. The historic district is a rare example of urban planning and design from the redevelopment era and, in particular, Northern California Regionalism that directly responds to Sacramento’s climate. These are expressed in its broad overhangs, shade trees, and celebration of outdoor living. It was envisioned and pioneered at the human scale, with landscape and architecture designed to enhance the livability for residents, neighbors to the site, and the larger community, thereby providing a public benefit to the entire City of Sacramento. Why wouldn’t the City be encouraging a unique sense of place and creating more civic pride that is associated with this historic district?

2030 General Plan Goal HCR 1.1: Comprehensive City Preservation Program.

“Maintain a comprehensive, citywide preservation program to identify, protect, and assist in the preservation of Sacramento’s historic and cultural resources.”

2030 General Plan Policy HCR 2.1.1 Identification.

“The City shall identify historic and cultural resources including individual properties, districts, and sites (e.g., archaeological sites) to provide adequate protection of these resources.”

2030 General Plan Policy HCR 2.1.2 Applicable Laws and Regulations.

“The City shall ensure that City, State, and Federal historic preservation laws, regulations, and codes are implemented, including the California Historical Building Code and State laws related to archaeological resources, to ensure the adequate protection of these resources.”

2030 General Plan Policy HCR 2.1.8 Historic Preservation Enforcement.

“The City shall ensure that City enforcement procedures and activities comply with local, State, and Federal historic and cultural preservation requirements.”

2030 General Plan Policy HCR 2.1.14 Demolition.

“The City shall consider demolition of historic resources as a last resort, to be permitted only if rehabilitation of the resource is not feasible, demolition is necessary to protect the health, safety, and welfare of its residents, or the public benefits outweigh the loss of the historic resource.”

2030 General Plan Policy CC.HCR 1.1 Preservation

“The City shall support programs for the preservation of historically and architecturally significant structures which are important to the unique character of the Central City.”

As described in great length in the earlier part of SacMod’s response, Capitol Towers is a historic district pursuant to Federal and State law. It has been formally determined eligible to be listed on the National Register of Historic Places and is listed on the California Register of Historical Resources. The City of Sacramento Preservation Director and Preservation Commission determined it should be a landmark and voted in favor of placing it on the Sacramento Register of Historic and Cultural Resources.

What has the City done to ensure that project alternatives and measures are taken to preserve the historical resources in Capitol Towers Historic District? These would include exploring decreased density options and alternative sites. How has Applicant

demonstrated that they need the proposed number of units for the project? Is the proposed Phasing indicated in the DEIR realistic? How has the City ensured that viable project alternatives have been thoroughly explored and considered? Most certainly, Sacramento Commons DEIR has failed to do so.

2030 General Plan Policy LU 5.6.2 Family-Friendly Downtown.

“The City shall promote the CBD as a family-friendly area by requiring the development of a variety of housing types, daycare and school facilities, family-oriented services, and parks, plazas, and open spaces that will safely and comfortably accommodate those who wish to raise a family.”

Sacramento Commons, as described by the Applicant during separate meetings with community groups, is not being built to be family-friendly. Their target demographic is young, single, higher-income, and childless.

2030 General Plan Policy H-3 5.6.2 Preservation Options (Affordable Housing).

“In addition to identifying units at risk of converting to market rate housing, Government Code Section 65583(a)(8)(B) requires a comparison of costs to replace lost units through construction or rehabilitation to the cost of preserving the existing units. Preservation of the at-risk units can be achieved in several ways, including 1) facilitating a transfer of ownership of these projects to affordable housing organizations; 2) purchasing of affordability covenants; and 3) providing rental assistance to tenants.”

What measures is the Applicant and City taking to ensure that preservation of similarly affordable housing for displaced Capitol Towers residents is achieved?

Policy CC.H 1.1 Mixed Use Buildings.

“The City shall provide the opportunity for mixture of housing with other uses in the same building or on the same site at selected locations to capitalize on the advantages of close-in living. The City of Sacramento General Plan, Land Use and Urban Design section contains key urban form characteristics envisioned for development within the Central Business District:

1. A mixture of mid- and high-rise buildings, creating a varied and dramatic skyline with unlimited heights;
2. Lot coverage generally not exceeding 90%;
3. Buildings are sited to positively define the public streetscape and public spaces;
4. Building facades and entrances directly addressing the street and a high degree of transparency;
5. An interconnected street system providing for traffic and route flexibility;

6. Vertical and horizontal integration of residential uses;
7. Public parks and open space areas within walking distance of local residents;
8. Parking is integrated into buildings or placed in separate structures;
9. Minimal or no curb cuts along primary streets;
10. Side or rear access to parking and service functions;
11. Broad sidewalks appointed with appropriate pedestrian amenities, including sidewalk restaurant/café seating;
12. Street design integrating pedestrian, bicycle, transit and vehicular use and incorporates traffic-calming features and on-street parking.”

Capitol Towers Historic District already embodies these principles.

**Sacramento Area Council of Governments MTP/SCS 2035 DEIR-
Mitigation Measure CR-1: Conduct historical resource studies and identify and
implement project-specific mitigation.**

“If the Historical Survey Report indicates that NRHP, CRHR or locally listed or eligible historical resources exist in the project study area, the implementing agency should consider avoidance as the primary mitigation measure. If avoidance is possible, mitigation is complete, and the impact to historical resources would be less than significant (LS).

If avoidance of a significant architectural/built environment resource is not feasible, additional mitigation options include, but are not limited to, specific design plans for historic districts, or plans for alteration or adaptive re-use of a historical resource that follows the Secretary of the Interior’s Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitation, Restoring, and Reconstructing Historic Buildings. Adaptive re-use or other measures developed consistent with the Secretary of the Interior’s Standards will reduce impacts to a less than significant level unless such measures are unable to avoid materially altering the physical characteristics creating the resource’s historical significance in an adverse manner. If the implementing agency determines these measures cannot avoid such material alterations to the physical characteristics creating the resource’s historical significance, then the impact would remain potentially significant (PS).”

As previously discussed, Capitol Towers Historic District already embodies the nine goals of Sacramento Commons’ DEIR. It is therefore possible to mitigate impacts to a lesser degree than what is offered in the DEIR. The DEIR fails to recognize and inappropriately dismisses other viable project alternatives.

Applicant has a Demonstrated History of “Flipping” Properties and has Virtually NO Development Experience

Evidence of Applicant’s track record of flipping a property and abandonment after receiving entitlements can be found in its [presentation](#) dated April 13, 2013, on page 10 — a “Case Study” in Hawaii — The Kohanaiki Golf & Ocean Club, which: “consists of a 450 acre site fronting over 1.5 miles of the Kona Coast of the Big Island of Hawaii.

- Originally acquired by Kennedy Wilson in 1997
- Company gained entitlements in 2004
- Kennedy Wilson sold its interest in the property in 2007; the new owners then invested approximately \$300 million for zoning, engineering, entitlement, and construction
- Kennedy Wilson reentered partnership in 2011 at a significantly reduced basis.”

KW has virtually no experience doing development. Per the [Beverly Hills Planning Department](#), KW’s development experience has been limited to minor improvements, including a request for a Development Plan Review to allow a rooftop lunchroom with outdoor seating and associated amenities; façade remodel; landscaping; a sign accommodation for a ground sign; and a sign accommodation to allow business identification signage. Only a handful of model homes at luxury resort Kohanaiki have been completed since KW’s repurchase.

Stewardship Issues

While the fate of Capitol Towers Historic District 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.

SacMod has received disturbing reports by Capitol Towers residents about practices such as:

- renting out Villas without disclosure to tenants the site is slated for demolition;
- rent increases with concurrent demise of services;
- site notice for the proposed project was posted but then was removed within 24 hours.

Project Alternatives

As previously demonstrated, the majority of ideas for improvements expressed by the applicant either already exist at the site or can be accomplished without demolition or destruction of the historical buildings, the historical structures, the historical landscaping, and the historical master plan. Demolition and/or alteration of these historical resources would be a significant and *avoidable* impact. Applicant’s DEIR

erroneously asserts that it can dismiss alternatives that address density and alternatives sites. There are many viable alternatives.

As acknowledged in DEIR 5-2, CEQA guidelines "... state that 'the discussion of alternatives shall focus on alternatives to the project or its location [that] are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly' (CEQA Guidelines, Section 15126.6[b]). Ironically, Sacramento Commons DEIR fails to comply with this guideline. Throughout the entitlement process, Applicant has refused to consider such alternatives.

1) No Project Alternative

Ideally, Sacramento Commons could be built on a more suitable and nearby available non-historical site that would benefit from such development. KW can modify the project for a site that is not currently inhabited by a historical resource. KW can build the project elsewhere in a vacant or available lot that needs enhancement, thereby actually fulfilling the true goals envisioned and promoted by TPP and infill policies.

Sacramento Commons' DEIR has chosen not to explore off-site alternatives that would prevent adverse effects of historical resources, despite the project's proximity to multiple large, vacant parcels and lots that contain no historical resources, which are also zoned for high residential density, and are adjacent to transit lines.

We suggest "The Docks" area would be an ideal location for Sacramento Commons due to its proximity to the waterfront and the proposed streetcar line. This location has already been approved for high rise residential. Additional nearby sites where potential off-site projects could be located include the 3/4 vacant city block across the street from the site between 7th , 8th , O and P Streets; the city block between 3rd, 4th, R and S Streets; and the city block at 3rd, 4th, L and Capitol. All are close to existing or planned transit lines, vacant, and zoned for high density residential use.

Furthermore, the majority of ideas for improvements expressed in the currently proposed Sacramento Commons development either 1) *already exist* at the site — or 2) can be accomplished without wasteful and needless demolition.

The No-Project Alternative is the only alternative that meets the requirements of the City of Sacramento's General Plan. The rest of the alternatives in Sacramento Commons' DEIR violate the City's Municipal Code Section 17.64.100, prioritizing preservation of historical resources as a method to sustain and revitalize neighborhoods, enhance the city's economic, cultural and aesthetic standing, its identity and its livability, marketability, and urban character.

2) Historic Stewardship Alternative

KW can embrace and respect the existing historic district's design and become an award-winning example of historic stewardship. KW can rehabilitate Capitol Towers Historic District within the with Guidelines for Preserving, Rehabilitation, Restoring, and Reconstructing Historic Buildings. Adaptive re-use or other measures developed consistent with the Secretary of the Interior's Standards will reduce impacts to a less than significant level unless such measures are unable to avoid materially altering the physical characteristics creating the resource's historical significance in an adverse manner.

KW can meet most of the expressed objectives in the March 2015 DEIR and March 2015 Planned Unit Development Guidelines by using already existing historical assets or by adding amenities to the existing historical assets. These objectives can be achieved by *enhancing* what is there, not destroying it.

Furthermore, the Applicant is eligible to receive tax credits and incentives to do improvements and repairs — thanks to the status of the Historic District. There are benefits and incentives that official National Register designation provides should the Sacramento Commons project choose to make use of these benefits. Tax credits and deductions include a 20% Federal tax credit for the rehabilitation of historical income-producing properties in accordance with national standards. These incentives are available to Kennedy Wilson as the owner of the historic district. For more about the Federal Historic Preservation Tax Credit Program, please see http://ohp.parks.ca.gov/?page_id=25007. If [AB 771](#) passes, the historic district could also receive additional tax credits. For more about Historic State Tax Credits, please see http://ohp.parks.ca.gov/?page_id=27495

3) Adding Density to the Existing Historic District Alternative per SOI Standards

On site, improvements and density could be achieved at the historic district in a manner that is more respectful and sensitive to the original master plan and design. A balance of increased density and retention of historical resources could be achieved.

There are ways to create new housing and infill development within a historic district that meet the Secretary of the Interior's Standards and City of Sacramento guidelines regarding infill in historic neighborhoods. The Applicant and Applicant's agents have not explored any alternatives with this approach.

For instance, there is opportunity for residential density, parking, and additional retail/commercial areas and perhaps even a boutique hotel where Parking Garage structure and adjacent parking lots on the East side of the Historic District are located. This minimizes impacts to resources within the Historic District. Depending on the skill, intelligence, and finesse of the approach and design, the advantages in the Historic Stewardship could apply.

4) **Carey & Company Sacramento Commons Preservation Alternatives 1 & 2 (DEIR Appendix D) 15-Story / 24-Story Core Retention Alternatives**

[Carey and Co.](#)'s November 5, 2014 Preservation Alternatives 1 and 2 (DEIR Alternatives 2 and 3) allow for some retention of the Historic District while allowing for demolition of historic resources.

While we consider these alternatives the least desirable of Alternatives 1 through 3 mentioned in our response above, there are some great ideas — such as the restoration of architectural features from the original Capitol Towers site — that should be considered and encouraged.

These proposed alternatives did not incorporate residential areas above parking levels and miss the opportunity for retail and commercial areas on the ground floors, but could be modified to do so. This would minimize the footprint of parking additions to the site.

Carey and Co.'s proposed alternatives could be improved so that density could be added while substantially lessening impacts on historical and cultural resources. For example, the Site B Tower (DEIR Figure 5-2) is currently proposed to have a north/south alignment and replaces a significant amount of the historical low-rise apartments. If it was reoriented to the east and west and moved slightly south to the existing parking lot, it would be a better design that responds to the Sacramento climate (less heat gain) and would not require demolition of existing historical resources.

Conclusion

SACRAMENTO COMMONS DOES NOT OFFER SUFFICIENT PUBLIC BENEFITS TO JUSTIFY THE DEMOLITION OF CAPITOL TOWERS HISTORIC DISTRICT.

The demolition of Capitol Towers Historic District is unnecessary. It would be the loss of a highly successful, established, mixed-use community and park neighborhood that has been a model for livable downtown housing for over 50 years. It is a thriving, vibrant, livable and established community that already embodies the standards, principles, and intentions that Sacramento Commons seeks to achieve. The buildings are inhabited, recently rehabilitated, and fully economically viable.

Capitol Towers Historic District and neighborhood is *already* one of the densest areas of downtown Sacramento, second only to Sacramento County Jail. Sacramento Commons seeks to shoehorn more density in an area that essentially conforms with the 2030 General Plan. The neighborhood's overall density is 59.8 units per acre.

Furthermore, the Applicant has claimed that a fundamental reason for the new project is to increase density of the existing Capitol Towers Historic District site, from

approximately 44 units per acre, compared to the property's land use category that recommends a density of 60-450 units per acre. But this land use category is not a strict limitation on densities allowed in the site, and is intended as an aggregate of *neighborhood* density. By comparison, the downtown Entertainment & Sports Complex, a similarly sized development project under the same land use category, is planned for a maximum total density of 550 units, or 55 units per acre, and currently only 69 units of housing are planned for the site, less than 7 units per acre. This zoning category also includes office and commercial buildings with no residents.

The Applicant, Kennedy Wilson, is unlikely to deliver the currently proposed project after receiving entitlements and flipping the properties pursuant to its track record. The Applicant is not a builder, it is a real estate investment trust. It does not plan on being the builder of this property. This proposal is a Planned Unit Development, intended to entitle the land for high-rise use, not a formal development plan to actually construct the buildings. However, there is no long-term requirement for a subsequent purchaser of that land to follow the PUD if they decide that another use is more beneficial to them — they only need to submit a new plan to the city that could ignore this plan entirely by seeking new entitlements. Sacramento Commons is a “flip” of the existing property based on potential future value that sacrifices the existing, occupied, densely populated, well-maintained and economically viable apartment complex on the site so Kennedy Wilson can profit from the speculative future value of the land underneath the buildings.

The demolition of Capitol Towers Historic District unnecessarily destroys a vital contributor to the City's urban forest. Our urban forests are linked to the overall health and wellness of our residents. While other major cities such as New York and Chicago are seeking innovative ways to add park space to their urban cores (for example [High Line](#), [Pier 55 Park](#), [Millennium Park](#)), Sacramento Commons significantly reduces the greenspace and tree canopy in the Sacramento Central Business District. Additionally, there would be loss of park space and open space at human scale in an established neighborhood that is already pedestrian and bike friendly — and near bus stops and light rail.

The demolition of Capitol Towers Historic District and replacement with new construction for Sacramento Commons would increase usage of water, [a scarce natural resource during drought conditions](#).

Sacramento Commons is surprisingly car-centric. The current number of parking spaces is 390 for 409 units. This amounts to about .95 spaces for each unit. The proposed number of parking spaces is 1701 for 1,470 units. This amounts to a higher ratio of about 1.16 spaces for each unit. This adds a total of 1311 cars to the area — while at the same time — destroying the urban tree canopy that helps clean the air.

Sacramento Commons will displace hundreds of middle income renters in favor of higher income renters, forcing them to the suburbs and facilitating longer commutes. This paradoxically will result in a net increase in greenhouse gasses, not a decrease as the project's proponents claim. Additionally, the building of new “luxury” branded

apartments is inconsistent with Mayor Kevin Johnson's City 3.0 goals regarding income and housing inequality.

Furthermore, demolition of the historical low-rises at Capitol Towers Historic District means the loss of 220 reasonably priced apartments that are affordable to working people, recently restored, currently inhabited and economically viable as they are currently built. The proposed replacement housing is far more expensive, meaning that those displaced by demolition would not be able to afford the new project's rents. Thus, approval of this project means a loss of affordable housing in the central city that can only be replaced by later public subsidy in another project.

The demolition of Capitol Towers Historic District and replacement with new construction is wasteful, unnecessary, and antithetical to the nature of sustainability. As discussed earlier, it takes 10 to 80 years for a new building that is 30 percent more efficient than an average-performing existing building to overcome, through efficient operations, the negative climate change impacts related to the construction process.

The proposed improvements outlined in Sacramento Commons' March 2015 PUD Guidelines could be achieved without destroying Capitol Towers Historic District. Capitol Towers Historic District *already has* — or can easily integrate — the improvements and amenities touted by Sacramento Commons without destroying historical resources.

The City of Sacramento has already granted entitlements elsewhere to achieve its goal for density. SacMod counted a total of at least 26,146 new or entitled units in or close to Central City and another 21,946 units nearby in Natomas, South Sacramento, and West Sacramento.

Sacramento Commons DEIR's version of mitigation through documentation and recordation with various interpretive plaques and exhibits after the demise of Capitol Towers Historic District is insufficient. This very type of mitigation has been successfully challenged in court.

Finally, Sacramento Commons' DEIR violates local, state, and federal public policies and needlessly exposes taxpayers to litigation arising out of these violations.

The Applicant and Applicant's agents have been unyielding to any compromises or alternatives from the beginning. Neighbors' and residents' concerns were dismissed and ignored. This is in great contrast with other large-scale developments in the City (for example, Delta Shores) who have taken the time to listen to and integrate the input of residents, neighbors, and the community into their projects.

Though Applicant and Applicant's agents were advised by members of the preservation community in February 2014 regarding the existence of historical resources, they dismissed this advisement and continued to deny the existence of historical resources

even after it was formally determined eligible to be listed on the National Register of Historic Places and was listed on the California Register of Historical Resources.

In closing, SacMod urges that the City deny the entitlements currently sought by the Sacramento Commons project and to provide the necessary leadership, guidance, and commitment to ensure that CEQA law is upheld. In the excitement surrounding the developments downtown and consequent rush to get in on the action, this neighborhood has been inappropriately targeted.

It does not make sense to destroy the most beautiful, functional, successful, dense, established residential community downtown. This historic district and neighborhood remains unparalleled in the architectural talent and planning principles it embodies even to this day. Furthermore, the historic district 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?

Historic districts are our connection with the past and give our city character. Historic districts offer our city flexibility and stability, and provide centers of civic and economic activity. They encourage ongoing care of existing properties and recognize organic growth. Together, these are the ingredients for a vibrant and interesting cityscape. They offer a sense of place and are the cultural heart of our city.

As [eloquently noted by Tom Mayes](#):

“Old places are deeply beneficial to people because of the way they give us a sense of [continuity](#), [identity](#) and [belonging](#), because they inspire us with awe, [beauty](#) and [sacredness](#), because they tell us about [history](#), [ancestry](#) and [learning](#), and because they foster [healthy, sustainable communities](#)....

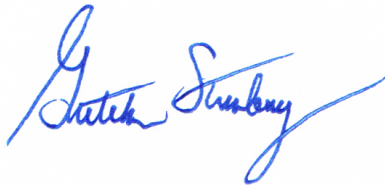
.... as Donovan Rypkema, real estate consultant and principal of [PlaceEconomics](#) puts it, ‘The good news is historic preservation is good for the economy. In the last 15 years dozens of studies have been conducted throughout the United States, by different analysts, using different methodologies. But the results of those studies are remarkably consistent—historic preservation is good for the local economy. From this large and growing body of research, the positive impact of historic preservation on the economy has been documented in six broad areas: **1)** jobs, **2)** property values, **3)** heritage tourism, **4)** environmental impact, **5)** social impact, and **6)** downtown revitalization.’”

Let’s break the cycle of wasteful and needless destruction of beautiful and historical structures. Let’s retain vibrant established communities such as Capitol Towers that breathe life and a sense of place into our City.

This is a long, complicated process, but SacMod seeks to facilitate a measured, rational, and reasonable outcome for Sacramento Commons. Preservation AND progress can be achieved through compromise and ingenuity.

Sacramento Commons should go back to the drawing board. We CAN and we SHOULD do better — for our city — for our people — and for our future.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Gretchen Steinberg". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Gretchen Steinberg, President, SacMod

In conjunction with the SacMod Board of Directors:

Dane Henas, Vice President

Nick Vinciguerra, Secretary

Zann Gates, Treasurer

Justin Wood, Director At-Large

Jon Hill, Director At-Large

Capitol Towers

Sacramento's Modernist Gem

Flora Chou

Despite winning many awards, the 1965 Capitol Towers is today a little-known but excellent example of modernist urban housing. Intended to be an integral element of Sacramento's first realized urban redevelopment project, its all-star design team rejected the rows of identical towers associated with typical urban renewal projects of the day. Instead they placed emphasis on human-scaled urban living, mixing earlier Garden City principles of affordable, low-rise garden apartments in a parklike setting, while introducing a modern high rise for increased density and a public plaza at the heart. The resulting mix of both vertical and horizontal building elements, linked by landscaped spaces and a now-mature tree canopy, created a well-scaled, well-planned, and highly livable community.

An important work for all the architects involved, Capitol Towers is also a key work by master landscape architect Lawrence Halprin. It was among Halprin's earliest urban plazas and shows some early exploration of themes that became Halprin signatures in the years that followed: the collaborative design process, the way people move through public spaces, and most importantly, the civic plaza integrated with art and the built environment. Capitol Towers was Halprin's first exploration of this design trademark, which he would further develop at places like Ghirardelli Square and Embarcadero Plaza in San Francisco.

A proposed new development threatens to erase what has been a beloved and livable community for more than 50 years and a rare example of an urban garden apartment complex designed by a stellar group of the most talented designers of their time.

Urban Renewal

In the years following World War II, massive urban renewal projects sought to rehabilitate deteriorating city centers by replacing "blighted" downtowns with modern urban cores. By the time California had the tools in place for urban renewal in

the mid-1950s, a backlash was mounting against the "bleak towers" and "box-like buildings, no better than the slums they replaced," that defined redevelopment projects elsewhere.¹ In 1958, the same year New York developer James Scheuer was selected to develop Capitol Towers, he wrote:

We have now been warned that unless urban renewal is radically improved it will die aborning through lack of public support. The public will simply refuse to make the necessary capital investment, not only in terms of money but in terms of the inconvenience and dislocation which are unavoidable costs of redevelopment...there is no reason why redevelopment projects cannot be exciting and attractive. Why must all buildings in a project be identical?²

Capitol Towers was Scheuer's and his design team's response. Designed and constructed in phases between 1958 and 1965, Capitol Towers is a unique collaboration by some of the most distinguished and highly regarded modern designers of the period. Leading the team was Wurster, Bernardi and Emmons, whose principals William Wurster, Theodore Bernardi, and Donn Emmons were instrumental in defining the look and feel of Bay Region Modernism. Joining them was the architectural team of Vernon DeMars and Donald Reay, fellow San Francisco architects also influential in the Bay Region Modernism movement. Rounding out the team was Edward Larabee Barnes, a New York-based architect and former Wurster employee who would go on to a distinguished design career.

Combining Garden City planning principles with Le Corbusier's "ideal city" high-rise planning from earlier in the twentieth century, Capitol Towers is a 10-acre superblock (equaling four city blocks) just south of Sacramento's Capitol Mall. The 409 rental units are housed in eight two- or three-story garden apartment buildings and one 15-story tower. Automobiles are confined to the perimeter parking courts and a parking structure. The pedestrian-only interior extends from the existing

street grid along walkways that divide the site into four quadrants. At the core of the site, the walkways intersect to open into a central plaza at the heart of the community. A striking sculptural wall by artist Jacques Overhoff anchors the plaza and divides it from the complex's swimming pool. Toward the center is the tower, which houses restaurants and retail at its ground floor.³

The design of the low-rise garden apartments was kept deliberately simple, as is typical for Bay Region Modernism. Staggered unit modules, deep overhangs, and open breezeways varied the design. Between the buildings, courtyards and landscaped courts were shared by the community. Balancing the public open spaces, each apartment has a private outdoor space in either an upper floor balcony or an enclosed ground floor patio. The balconies of the garden buildings typically overlook the shared lawns, while the enclosed patios are at the opposite side of the buildings to maximize privacy. Each tower unit also has a balcony.

Halprin's Landscape Plan

Lawrence Halprin (1916-2009) was one of the most prolific American landscape architects of the postwar years. His work exhibits an attention to human scale, user experience, and social impact. Capitol Towers came about during a transitional period from private residential, shopping mall, and college campus commissions to the larger-scale public and urban projects for which he is best known. As he later recalled, the Capitol Towers project shows Halprin exploring early iterations of

Opposite top: Central plaza with sculptural wall and swimming pool on the other side.

Opposite bottom: Main walkway and landscape into Capitol Towers flanked by staggered garden apartment buildings and on axis with the central plaza and sculptural wall in the background.

Images courtesy Page & Turnbull, 2014.



themes that would later become his design signatures:

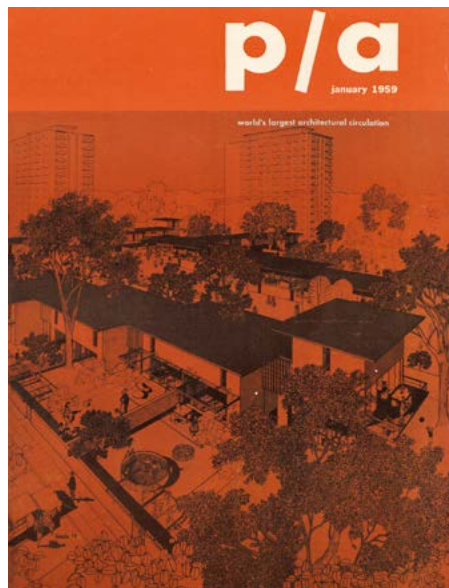
I was now working closely with some world-class architects and ... getting a great deal of experience. I designed my first urban plaza at the center of the Sacramento project [Capitol Towers], and brought in the sculptor Jacques Overhoff to work on an enclosing cast concrete wall. I was developing street details for these larger commissions and I was learning about graphics from the great graphic designer Saul Bass.⁴

Although budget constraints simplified Halprin's initial plans, landscaping was a defining element of the site planning for Capitol Towers. The low-rise buildings with shared lawns front the main walkways as if along a street. They also enclose more intimate courtyards in less trafficked areas, and their backs are around the service and parking courts. Landscaped courts with grids of trees or low plantings are found at each parking court and at the tower base, marking the transition into the site's pedestrian interior. Some existing site trees were saved and incorporated, and the design team fought to save street trees from proposed street widening by the city.⁵

While Capitol Towers engages the city beyond its site, the central feature is the internal plaza at the core. With a grid of London plane trees and a low circular fountain at the southeast corner, the plaza is a quiet gathering place enlivened by Overhoff's robust sculptural wall. In his 1963 book *Cities*, Halprin uses the plaza of Capitol Towers to illustrate his text on minor plazas, which encapsulates how he viewed plazas:

At the confluence of streets there are often small spaces which should be developed as handsome and colorful incidents in the heart of the city. A small plaza can contain, in a relatively casual way, sculpture, fountain, art exhibits, cafes, and benches which are human in scale, intimate, and usable. A local plaza gives a sense of place and becomes a focus for its neighborhood. It can be a rallying place for neighborhood activities and establish a quality and character for its inhabitants.⁶

Capitol Towers appears frequently throughout *Cities* as Halprin examines the elements that constitute successful urban spaces. In addition to the minor plaza, Capitol Towers' walkways are an example of a pedestrian mall, Overhoff's "great frieze, cast in concrete ... and tilted into place" illustrates when more solid barrier walls are needed to screen noise and views between busy public spaces and recreation areas, and a detailed notational system of walking through Capitol Towers is included to demonstrate Halprin's process for examining "the kinesthetic experience."⁷ He later



expanded his notation system as part of his RSVP Cycle and his constant fascination with movement through space. The street furniture Halprin designed for Capitol Towers—a globe light standard, wood-slat benches, a kiosk, among others—also make appearances in *Cities*.

The design of Capitol Towers was recognized early on with awards from *Progressive Architecture*, the Northern California Chapter of the AIA, and the Governor's Design Awards Program.⁸ Some changes have occurred over the last 50 years, including the loss of Halprin's light standard and the kiosk, but overall, Capitol Tower's primary spatial relationships, residential buildings, and key landscape features remain intact.

Under Threat

As with other garden apartment complexes, the abundance of open space and the relatively low scale that make Capitol Towers such a unique, livable place also make it vulnerable to calls for higher density. In December 2013, current owners Kennedy Wilson proposed to demolish all the low-rise buildings and much of the landscape in order to build over 1,200 new units and a hotel. The new buildings range from eight-story mid-rises to several buildings over 20 stories tall. More than 1,700 parking spaces would be in two large parking structures in the center of the site. Capitol Towers' original tower, axial walkways, and the central plaza would remain but would become unrecognizable.

A local preservation organization, Sacramento Modern, has been leading the advocacy effort to save Capitol Towers, and has been joined by the City of Sacramento

Preservation Commission and the State Historic Resources Commission, which voted in November to recommend Capitol Towers for the National Register of Historic Places. However, this does not prevent demolition, and the city's political leadership has not committed to saving Capitol Towers. The Draft Environmental Impact Report, expected early in 2015, will consider Capitol Towers a historic resource and should include preservation alternatives. ■

Endnotes

1. James H. Scheuer, "Letters to the Times: To Beautify Housing," *New York Times*, July 8, 1958. For more on the delayed urban redevelopment in California and in Sacramento, see Daniel S. Maroon, "Redevelopment in the Golden State: A Study in Plenary Power under the California Constitution," *Hastings Constitutional Law Quarterly*, Vol. 40:2, Winter 2013, 453-474 and Richard Trainor, *Floor, Fire and Blight: A History of Redevelopment in Sacramento*, (Sacramento: Sacramento Housing & Redevelopment Agency, 1991).

2. Scheuer, "Letters to the Times."

3. Two additional towers at the superblock's corners are located where towers were planned, but they were constructed in the 1970s and 1980s by different developers and design teams, and are not part of Capitol Towers.

4. Lawrence Halprin, *A Life Spent Changing Places* (Philadelphia: University of Pennsylvania Press, 2011), 108.

5. Newspaper articles and correspondences from 1958 in Sacramento Redevelopment Correspondence folder (014.I.A.6000) from Lawrence Halprin Collection, The Architectural Archives, University of Pennsylvania, Philadelphia, Pennsylvania.

6. Lawrence Halprin, *Cities*, Revised edition, (Cambridge, MA: MIT Press, 1972), 27.

7. Halprin, *Cities*, 21, 131, and 212-213.

8. Wurster, Bernardi, and Emmons, *Wurster, Bernardi and Emmons, Inc., Architects* (San Francisco, CA: Wurster, Bernardi and Emmons, Inc., 1967), 30.

Flora Chou is a cultural resources planner at Page & Turnbull's Los Angeles office. Prior to joining Page & Turnbull, she was a preservation advocate for the Los Angeles Conservancy, helping to implement the organization's advocacy efforts to protect historic resources. Flora holds a master's degree in historic preservation from Columbia University and is a LEED-accredited professional. Since 2012, she has served on the national board of Docomomo US, a national nonprofit organization that advocates for the buildings and sites of the modern movement.

Above: *Capitol Towers and Gardens* featured on the cover of *Progressive Architecture*, January 1959.

BARRY L. WASSERMAN FAIA

**Community Facilitation
Urban Design
Architecture**

October 24, 2014

Carol Roland-Nawi, Ph.D
State Historic Preservation Officer
California State Office of Historic Preservation
1725 23rd Street, Suite 100
Sacramento, CA 95816

Dear Ms. Roland-Nawi,

I wish to add my voice to those supporting the nomination of the Capitol Towers complex in downtown Sacramento to the National Register of Historic Places. The nomination packet submitted by Sacramento Modern clearly establishes the historic significance of Capitol Towers using applicable National Register Criteria A. and C.

The Capitol Towers complex is a non- replicable study resource for the general public and design professionals as they continue to deal with the national issue of providing central city housing solutions to deal with our nations ongoing housing need.

The complex is a significant example how privately sponsored urban redevelopment was utilized to support the public good. It is also an example of the design work of a significant group of design professionals who have been recognized nationally for their career work.

As the former California State Architect (1978-1984) who directed the development of the Sacramento Capitol Area Plan I can attest to the significance of this complex as a precursor to the basic principles of livability for urban infill that supported the Plan and its subsequent success as a revitalization of its 42 acres of downtown Sacramento.

As a former Principal of Lawrence Halprin Associates I can attest to the significance of the urban and landscape design of the complex to the body of work of Lawrence Halprin.

P. 2

Memory of the best of our past is to be revered and preserved. As Winston Churchill said “We shape our buildings and they shape us”. In this case the complete Capitol Towers complex serves to provide an ongoing testimony to the impact good urban design can have on our community.

Capitol Towers was far reaching in its time and continues to be significant in the present. Sacramento and California cannot afford to see it lost. It deserves to be added to the National Register of Historic Places.

Sincerely.

Barry L. Wasserman, FAIA

Crain, Amy@Parks

From: David Crowe
Sent: Monday, October 20, 2014 10:50 AM
To:
Cc: Crain, Amy@Parks;
Subject: In Support of Capitol Towers and Garden Apartments, Sacramento

RE: In Support of Capitol Towers and Garden Apartments, Sacramento

October 19, 2014

Dear Ms. Roland-Nawi:

My wife and I moved into Capitol Towers when we first moved to Sacramento in 2006. We wanted to experience high-rise living and took a 10th floor unit on the north side with a view of the Capitol. Our stay there drives us to speak out about the unique virtues of the development.

Capitol Towers is not only of historical significance, but also a valuable teaching environment for developers, planners, architects and the general public. It's a testament of what good urban housing can and should be. To walk through the square block park is to experience a sense of place, a respite from the hurried city that surrounds it. Truly, a place its residents can relax in and enjoy the outdoors within walking distance of downtown and light rail. Its lone tower set back amongst the low-rise apartments is allowed to be the viewing platform to the city that it was meant to be. And the units themselves are spacious, open and light-filled with walls of glass that promote indoor/outdoor living that is rare in contemporary urban development.

Now, developer financial-driven housing is based on what will pencil-out, not the livability of what is left behind. As an architect, I understand times have changed and real estate is at a premium in the area, but what hasn't changed is why we should be building housing. Capitol Towers reminds us that housing is for people not only for investment. There are lessons to be learned from this place. Lessons about light and air, privacy, and breathing room. Once the infill begins, and density devours the gardens, the opportunity to experience and learn from what once was a thoughtful development will be lost forever. Please, let it be.

Thank you for your consideration.

Sincerely,

David Crowe

docomomo_us

documentation and conservation
of buildings, sites and neighborhoods of the
modern movement

Northern California Chapter

PO Box 29226
San Francisco, CA 94129
info@docomomo-noca.org
www.docomomo-us.org

October 13, 2014

Carol Roland-Nawi, State Historic Preservation Officer
California State Office of Historic Preservation
1725 23rd Street, Suite 100
Sacramento, CA 95816-7100

Re: Capitol Towers Nomination

Dear Ms. Roland-Nawi,

I am writing to express support for the nomination of Capitol Towers in Sacramento, California, to the National Register of Historic Places. DOCOMOMO/NOCA is the Northern California chapter of the international non-profit organization Documentation and Conservation of the Modern Movement, established nearly 25 years ago to provide leadership, education, and advocacy assistance to people committed to saving places and collectively shaping the future of America's stories.

As the first privately-sponsored redevelopment project in California, the Capitol Towers site is a significant example of Modern planning, landscape and architectural design. It represents the successful collaboration of multiple noted mid-20th century architects and designers: Wurster, Bernardi, and Emmons; Edward Larrabee Barnes; DeMars & Reay; and Lawrence Halprin; who together created a pedestrian-oriented housing complex that remains a unique and innovative example of the redevelopment era.

Large-scale Modern sites are increasingly facing development pressures, and continue to be lost even as their age exceeds the 50 year threshold. For example, Parkmerced, a significant modern housing complex in San Francisco, was found to be eligible for listing on the National Register, but was never officially listed and was approved for demolition in 2011. The submitted Capitol Towers National Register nomination is a thorough and well-researched document. Board members of the Northern California Chapter of DOCOMOMO US concur with the findings of the nomination that Capitol Towers is an important example of its type, period and the work of masters and is worthy of designation on the National Register. Please feel free to contact us for more information, or if you have specific questions or concerns.

Sincerely,



Justin Greving
President, DOCOMOMO/NOCA

Crain, Amy@Parks

From: Judith Lamare ·
Sent: Wednesday, October 15, 2014 1:58 PM
To: Illa Collin
Cc: OHP, CALSHPO@Parks; caru.bowns@gmail.com; kathleenforrest@hotmail.com; eric@bbse.com; Huck, Mark@Parks; jon.marschack@att.net; chad.moffett@meadhunt.com; Matthew Piner; gretchen steinberg; Crain, Amy@Parks; rnpreservation@gmail.com; Roberta Deering; Jim Pacht; Carr Kunze
Subject: Re: 10/15/14 Item 6, Capitol Towers and Villas

Dear City of Sacramento Preservation Commission, State Historic Preservation Officer and State Historic Preservation Commission:

Below is transmitted an email I received from former Sacramento County Supervisor Illa Collin, expressing her support for the preservation of the Capitol Towers and Villas. She asked me to forward this to you. Illa Collin served decades as a county supervisor, but also she has been very important as a key leader for the Sacramento environmental community. She has been recognized with many awards for protecting Sacramento's natural resources. Because of her huge contribution to Sacramento's civic life, I am very touched by her story below which attributes her move to Sacramento to the Capitol Towers and Garden Apartments. In her email below she explains what Capitol Towers and Villas has meant to her personally.

Statement submitted by Illa Collin, 7423 Braeridge, Sacramento, CA 95831

My husband and I moved to California in 1957 and settled in the Bay Area in Oakland where he had a job as insurance adjuster and I was a teacher in Piedmont. He then went to UC Berkeley to study law at Boalt. When he passed the Bar exam he went to work for the California Farm Bureau and quickly became a lobbyist and rented one of the Garden units under consideration for designation for Historical Preservation. I began receiving calls from Assemblymen and Senators encouraging me to agree to move to Sacramento as they wanted my husband to accept a position with the Revenue and Taxation Committee of the Assembly. To me Sacramento was just that horrible hot and grimy place we had to crawl through on our annual trip to Portland. At that time we had 3 young daughters and I did not want to move to the hot, miserable valley and Sacramento. The calls kept coming and they suggested I bring the girls and live with Don for at least a weekend and then see how I reacted to the idea. I did agree to that and it was Fall and maybe not so miserable in the Valley. We stayed in that Garden apartment unit and could not believe such an oasis existed in Sacramento!! Trees and grass and a City that had a real sense of place. We explored the City and found parks and trees right in the downtown area and also discovered Land Park and the Zoo and pony rides. All of which enchanted the girls. So staying there in that incredible oasis in the Garden unit was the key to our decision to move to Sacramento. To have such a treasure downtown deserves recognition.

Emailed by:
JUDITH LAMARE

From: Judith Lamare ·
Sent: Thursday, October 16, 2014 9:47 AM
To: Crain, Amy@Parks
Cc: gretchen steinberg; Carr Kunze; Roberta Deering; Michael Galizio
Subject: Re Capitol Towers and Villas, bio/tribute to Illa Collin

Amy

Could we append this tribute to Illa Collin's email that I sent yesterday regarding Capitol Towers and Villas?

It is by Congresswoman Doris Matsui on the occasion of Illa's retirement as a county supervisor in 2007. It notes her role in creating the Sacramento Tree Foundation and the AMerican River Parkway Foundation among other achievements.

Link: http://capitolwords.org/date/2007/01/24/E192-3_retirement-of-supervisor-illa-collin/

Rep. Doris Matsui



DCA

Madam Speaker, I rise in tribute to Sacramento County Supervisor Illa Collin and her esteemed career. Supervisor Collin built a lasting legacy in Sacramento County and her presence on the board of supervisors will be deeply missed. As her friends, family and coworkers all gather to celebrate her career, I ask my colleagues to join me in honoring the dedicated service of one of Sacramento's finest leaders. Illa Collin was first elected to the Sacramento County Board of Supervisors in 1978. She immediately made her presence known by tirelessly working to strengthen neighborhoods and revitalize urban corridors. Through her 28 years on the board of supervisors, she has preserved much of Sacramento County's natural beauty and open space. Supervisor Collin has consistently been praised for her environmental record and leadership. She helped create the Sacramento Tree Foundation and the American River Parkway Foundation. She has received the Outstanding Service Award from the California Parks and Recreation Society as well as the Outstanding Public Official Award from the National Association of County Parks and Recreation Officials. In 2005, Supervisor Collin received the Environmentalist of the Year Award from the Sacramento Chapter of the Sierra Club. Supervisor Collin performed an instrumental role in the women's movement. From 1973 to 1975, Illa helped lead the League of Women voters in Sacramento and in 1977 she became the first woman to serve as the President of the State Reclamation Board. She has also received the Hannah G. Solomon Award from the National Council of Jewish Women for improving the lives of women, children, and families. Prior to her service on the board of supervisors, Illa worked to improve Sacramento on a number of fronts, including social services and community planning. Now, after seven terms, Illa will be departing from the board of supervisors. The people of Sacramento will miss her leadership, experience and dedication. Our community has been fortunate to be graced by the presence of such an extraordinary woman. Madam Speaker, I am proud to honor one of Sacramento's most distinguished citizens, Illa Collin. Her success and steady voice has been an inspiration to Sacramento residents throughout the years. I ask all my colleagues to join me in thanking Illa Collin and wishing her continued success and happiness in her future endeavors.

A Letter from Neighbors

October 14, 2014

State Historic Preservation Officer, Carol Roland-Nawi, Ph.D.
State Historic Preservation Commission
1725 23rd Street, Suite 100
Sacramento, CA 95816

Chair and Members of the Commission
Roberta Deering, Staff
Sacramento Historic Preservation Commission
300 Richards Boulevard, 3rd Floor
Sacramento, CA 95811

RE: Capitol Towers and Garden Apartments
Nomination to the National Register of Historic Places - **SUPPORT**

Dear Members of the Commissions:

As neighbors living in towers adjacent to the nominated property, we are pleased to submit this letter in strong and unwavering support of the nomination of Capitol Towers and Garden Apartments to the National Register of Historic Places.

We also would like to commend to you the Page and Turnbull historical survey which outlines and confirms the rationale for this important nomination, organized and submitted by Sacramento Modern, a non-profit dedicated to protection of modern art and architecture in Sacramento.

The architectural masters, Barnes, Halperin and Wurster were the visionaries of this urban renewal project. Their collective expertise and vision led to what we enjoy today, a true urban oasis under a beautiful canopy of traditional Sacramento trees. Not only is this project significant to our city and state, but to the nation. The principals in the project's design, construction and landscaping are recognized as innovative for their time, and they are all leaders in their fields.

The Capitol Towers and Apartments are a part of a planned central city neighborhood with 748 housing units and ground level retail. It is a wonderful example of just how important urban renewal projects designed by smart and forward thinking designers can be. The unique and creative mid century modern design has made our community one of the most attractive in Sacramento for decades. This mature, healthy and successful project brings to downtown exactly the kind of residents the city is seeking to locate in the downtown area.

Our city has few examples of nationally recognized mid century modern residential housing. Based on our understanding of the preservation criteria, at a minimum the historic buildings and landscape plan meet Criteria A and B. Without this example of great urban architecture, our community will never be the same.

One of the most significant aspects of these buildings and surrounding open space is that they create a comfortable, pleasing yet utilitarian anchor to high rise living. Demolition and construction will tear apart a strong and vibrant downtown community and most importantly, we will fail to preserve and protect what is sure to become increasingly more valuable historic housing in Sacramento.

We implore the Commissions to support the nomination.

Neighbors of Capitol Towers and Villas

George P. Acerno
500 N. Street, Unit #1602
Sacramento, CA 95814

Elizabeth Acerno
500 N. St Unit 1602
Sacramento, CA 95814

Michael Galizio

Bobbie Metzgar

Michael Galizio and Bobbie Metzgar, 500 N, APT 1004

Peter Kmeto

Peter Kmeto, 500 N, APT 610



James P. Pachl and Judith Lamare, 500 N, APT 1403



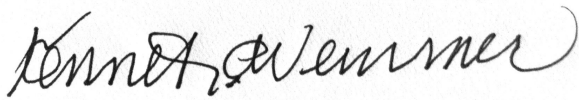
Julie Mumma, 500 N, APT 806



Tommy Leong, 500 N, APT 605



JD Rowell, 500 N, APT 504



Kenneth Wemmer, 500 N, APT 1209

And Residents of Pioneer Tower, 515 P Street

We implore the Commissions to support the nomination.

Robert L. Hrew
Ludysay Stanley
Evelyn
Rena Brown
Angie Waf
Jeanne Johnson
Maura Pina
Geoff Adickoff
Mary Carochus
Maria Guittare
Angie Perry
Mertha M. Millhone
NUVEZ EVA
Cuegn Hoffas
Mary Ann Millhone
Shirley Ingram
Maria L. Cardenas
Bonnie Danker
Judi Gheza
Gloria Williams
Jola Ramsey

Ida Falcon
Malcolm Allen

Crain, Amy@Parks

Subject: FW: Capitol Towers & Garden Apartments, Nomination for NRHP Listing
Attachments: CA SHPO CapTwrs 100914.pdf

From: Pachl & Lamare
Sent: Friday, October 10, 2014 6:05 AM
To: [redacted]
Cc: OHP, CALSHPO@Parks; gretchen steinberg; Roberta Deering; Kimberly Anderson; Brian Sehnert; Peters, Richard;

Subject: Re: Capitol Towers & Garden Apartments, Nomination for NRHP Listing

Excellent letter. Thank you very much.

Jm Pachl

On Oct 9, 2014, at 10:49 PM,

Dear Dr. Roland-Nawi and staff,

Attached please find a PDF of my letter of support for the nomination of Capitol Towers and Garden Apartments to the National Register of Historic Places, pursuant to the Historical Survey prepared by Page and Turnbull of August 27, 2014.

In addition to the relevant factors identified in the Page and Turnbull survey, I have noted in the attached letter additional facts that I believe to be relevant and which should be considered in support of the nomination by the Office and California Historic Resources Commission.

If you have any questions in regards to the points that I have raised, please feel free to contact me by e-mail at the above

Thank you very much for your careful consideration of this matter.

Respectfully,

Carr Kunze

CARR KUNZE

October 9, 2014

Dr. Carol Roland-Nawi, State Historic Preservation Officer
OFFICE OF HISTORIC PRESERVATION
1725 23rd Street, Suite 100
Sacramento, CA 95816

via: **calshpo@parks.ca.gov**

RE: Capitol Towers and Garden Apartments, Nomination to the National Register of Historic Places, Letter of Support

Dear Dr. Roland-Nawi and staff,

This letter is submitted in support of the nomination of Capitol Towers and Garden Apartments to the National Register of Historic Places. I wish to fully support the nomination submitted by Sacramento Modern based upon the Historical Survey prepared by Page and Turnbull of August 27, 2014.

In addition to the factors considered by the Page and Turnbull survey in regards to Criteria A and B, I will note additional considerations herein below, principally:

- Capitol Towers and Garden Apartments represents an important post WW II introduction of the Bay Area style, (or more appropriately, Northern California Regionalism) to large scale, market rate, multifamily housing.
- Capitol Towers and Garden Apartments is among a select group of urban renewal projects in the nation that were designed by teams comprising architectural masters—the greatest architects of the mid 20th century. There are perhaps no more than 5 to 10 such developments in the country. Some of these, particularly those which have rental tenures, are now threatened with demolition or serious degradation. Their loss would be a serious loss from the architectural, planning, and urban design history of the country and era. These impending losses have gone substantially under-recognized as to their critical relevance to US urban design history.
- Capitol Towers and Garden Apartments is the work of two clearly identified masters: Edward Larabee Barnes, and Lawrence Halprin and most likely a third, W. W. Wurster and thereby, meets Criterion B as well. In addition, the collective team, each member having substantial reputations and works of significance in California, the eastern U.S., and Great Britain, should be considered as a collective work of masters.

- Capitol Towers is a vitally important part of the architectural and historic fabric of downtown Sacramento. It represents a major example of Bay Area or Northern California Regionalism in mid-20th Century architecture and of urban design by the architect and firm that were considered the leader of this architectural movement.¹

The design is a collaborative effort by a team of architects, planners, and landscape architect that were internationally renowned. Two members, William Wilson Wurster and Edward Larabee Barnes, were given AIA Gold Medals—an honor reserved for the greatest architects, internationally, of their era.² Wurster was born and raised in Stockton and was the second Californian so recognized after Bernard Maybeck. Lawrence Halprin, the project's landscape architect was also internationally recognized as one of the US' most innovative leaders in his field of the era.

William Wilson Wurster and his practice, Wurster, Bernardi, and Emmons, have received more national awards from the American Institute of Architects for their work in California than any other architectural practice since 1949 to this date.³

Importantly, Capitol Towers is an early example applying Northern California Regionalism to market-rate multifamily housing. It incorporates elements not previously brought together for multifamily housing: garden patios, balcony porches, with sun-screening provided by large roof overhangs and trellises over the larger sliding glass door openings⁴. At the same time, Wurster's team

¹ Bay Area Regionalism was recognized as a 'softer approach' to modernism, utilizing greater informality and typically native materials and forms. W.W. Wurster was first identified as leading this movement by architectural critic and urban historian Louis Mumford ("The Skyline: The Status Quo", *The New Yorker*, October 11, 1947, pp. 106, 109). Also recognizing Wurster's leadership of this school are former California State Historian Kevin Starr, (*California*, 2005, p. 295), and architectural historian Kenneth Frampton (*Modern Architecture, a critical history*, 1980, 2007, p. 320) among others.

² In the decade preceding Wurster's award in 1969 were in order by year from 1959: Walter Gropius (Bauhaus founder), Ludwig Mies van der Rohe, Le Corbusier, Eero Saarinen, Alvar Aalto, Pier Luigi Nervi, Kenzo Tange, Wallace K. Harrison, and Marcel Breuer. Frank Lloyd Wright was gold medalist in 1949. Following Wurster were: R. Buckminster Fuller, Louis Kahn, Pietro Belluschi, Richard Neutra, and Philip Johnson.

³ AIA records begin in 1949. Wurster/WB&E received 8 Merit or Honor Awards. Frank Ghery has received 7. Anshen & Allen: 6; Richard J. Neutra/Neutra & Alexander/Neutra & Neutra: 6; John Carl Warnecke & Assoc.: 6; Joseph Esherick/Esherick Homsey Dodge & Davis: 5.

⁴ Some of these elements could be found earlier, but usually in more parsimonious form such as smaller balcony areas, extensions of 2nd floor exterior walkways, or small utility yards for storing garbage or hanging out laundry. WB&E's introduction of large overhangs and trellis screening at Capitol Towers, appear upon review of earlier publications, to be the first time such elements are used together with the more ample and

incorporated motifs that trended away from other modern architecture: tall vertical windows harkening to the vernacular properties of gold-rush, Old Town and Victorian architecture that reduce heat-gain/loss, accommodating the Central Valley's climate.

Capitol Towers is a prime example of Wurster's and the team's approach to a more humanistic architecture, dedicated to its users rather than serving as a monument to the designer. This was an attitude that was shared by the team as noted in their work and respective biographies. At the time of entering into the contract for Capitol Towers and assembling the design team, Wurster and his wife, the eminent housing reformer of the era, Catherine Bauer, had just returned from a sabbatical to Europe and Asia. Wurster had revisited old friends and colleagues in Europe: Alvar Aalto of Finland and Kay Fisker of Denmark and others who shared the Wursters' regionalist and humanistic values as applied to multifamily housing, where Scandinavians had taken a leadership role.

Indeed, if as the writer and statesman Johann Wolfgang von Goethe, had once noted, "architecture is like frozen music", then Capitol Towers should be regarded as the Wurster/WB&E team's apotheosis to Aaron Copeland's "Fanfare for the Common Man". It creates a respectful, understated, informal series of receding planes in structures that step back and form public and private garden spaces for use by its residents, neighbors, and the local public. It brings, art, landscape architecture, architecture, and urban design to a level rarely experienced in California or national multifamily residential architecture.

In many respects, Capitol Towers surpasses the more formal and somewhat rigid structuring of buildings and spaces that characterized much of the urban renewal planning of the era, including the earlier concepts proposed by Richard Neutra. The Sacramento Redevelopment Authority had exercised great vision to turn from Neutra to the W.B.&E team's regional sensibilities.

Great architecture is not just about buildings: their rooms, arrangement, and facades, it is also about space—the quality of interior spaces, as well as the spaces which the buildings form. The search by architects for those limited opportunities to create great spaces has continued over the epochs. One thinks of what many have considered the most beautiful of these: St. Marks Square in Venice, but other great spaces have been created elsewhere. From a residential form giving standpoint, the out-door rooms created by J. Wood, the elder and John Wood the younger at the Circus and Crescent of Bath, England, respectively come to mind.

considered design of balconies and private garden spaces in large scale garden apartment developments—including here, the reversal of floor plans to assure garden patio area privacy.

Urban renewal gave several architectural teams the opportunity to create a new generation of grand urban spaces. The results were often stultifying and rigid when carried out in the rectilinear patterns of some internationalists. Yet, a few would stand out. In this regard, Capitol Towers and Garden Apartments truly 'broke the mold' of the era with its complement of intimate as well as larger yet informal spaces—a tribute to this special collection of humanistic, regionalist designers.

W.B.&E's and Barnes' approach to modernism is easily misunderstood. One of the books reviewing Wurster's work is entitled "An everyday modernism: the houses of William Wurster"⁵. Wurster's work was at times maligned, particularly by the 'internationalists', but more often appreciated for achieving its quintessential 'artlessness'—a casualness that would become characteristic of much of Northern California's domestic architecture. However, this architecture requires close examination of the details referenced above to appreciate what distinguishes it from lesser works that would imitate and follow from it.

There may be some contention as to whether Capitol Towers represents the work of a master. As noted above, I believe that it can ultimately be established that it is the work of three masters. While it has been difficult to establish W. W. Wurster's own hand in the project, as referenced earlier, it is unlikely given his then recent return from Europe and interactions with designers of comparable stature that he did not so engage in the project's design. His keen interest in multifamily housing together with that of his wife, Catherine Bauer, as well as this project representing an opportunity to expand upon ideas he had been fostering for more than a decade would argue heavily for his involvement and influence despite the absence of notes.

The design work of the other two primary recognized masters, Edward Larabee Barnes and landscape architect Lawrence Halprin is more clear.

Nonetheless, an issue in preservation is raised as we go forward. While being able to definitively identify a project as the 'work of a master' may be a measuring stick against works of earlier centuries, it may be a terribly inappropriate one in the latter part of the 20th century, and as we move into the 21st, in view of how the process of architectural design transpires in large offices that engage in the larger and more complex projects. By such a standard, there would be very little 'great' or historically significant architecture to come out of the 21st century given the process and structure of architectural offices these days.

Moreover, a 'master' has several ways of being engaged in the design process. This can be accomplished through sketches (which are often not saved), or verbally in exchanges with associates who are participating in the design decision-making, or via a process of critique of the ideas of junior designers who

⁵ Marc Teib, ed., S.F. Museum of Modern Art in assoc. with U.C. Press, 1995.

are working alongside or are bringing back for review the proposal. Is the master's signature on the most recent electronic adjustment or conceptual development that is being shared across multiple computers? Which is the master's adjustment and that of the partner or senior designer?

Skidmore, Owings, and Merrill received much of the credit for the iconic Lever House in New York City, yet most know that Lever House was designed by Gordon Bunshaft of their firm. How much credit should Le Corbusier get for the UN building versus Oscar Niemeyer? And, we know that Wesley Peters, Aaron Green, or Fred Langhorst often had considerable roles in designing and carrying out Frank Lloyd Wright's later works. If we go back far enough, how much credit should Raphael receive for painting the "School of Athens" in the Vatican, when he engaged several members of his atelier of 50 in executing the work?

In regards to Capitol Towers being the work of a master, consideration should be made for the evolving collaborative design process.⁶ Wurster may well have been more involved than the evidence shows—with sketches just lost, or the commentary, critiques, and exchanges not recorded. Indeed, as referenced above, here was Wurster's opportunity with his great interest in housing to engage in a design for the everyday person; to explore, interpret, and re-assert ideas that he had just shared with his eminent European colleagues. If not so, why indeed after the initial phase's design was completed would the City go on to appoint him to the Capitol Building and Planning Commission of Sacramento?

Sacramento has comparatively little in the way of nationally noted examples of architecture, particularly in regards to that of the mid-20th century. Thus a loss of Capitol Towers would be a blow to this very limited cultural resource inventory. A review of the National AIA's list of Honor and Merit awards for California, dating from 1949 to present shows Sacramento as receiving 3 such awards (2 of which were for renovations), while San Francisco has 20, Los Angeles 24, San Diego 5, and seven other cities, including Berkeley, Santa Monica, Pasadena, and Mill Valley had received 4 awards over the last 65 years.

A more comprehensive but very dated survey (1973)⁷ identified some 35 structures in Sacramento as architecturally noteworthy. These ranged from the

⁶ The 'collaborative' design process in modern architecture was advanced by Walter Gropius, Bauhaus founder and later, chair of architecture at Harvard. Wurster would engage in graduate study at Harvard at the time, while going on to become dean of architecture at MIT while Gropius was next door. Wurster would carry on the collaborative approach in his own practice, which would serve as the mentoring grounds for not only Barnes, but also many architects who would gain recognition while extending and reinterpreting Northern California Regionalism in architecture.

⁷ David Gebhard, Roger Montgomery, Robert Winter, John Woodbridge, Sally Woodbridge, *a guide to Architecture in San Francisco & Northern California*, 1973, pgs. 394-403. No comparable region-wide survey appears to have been subsequently made.

Stanford-Lathrop house, to the Capitol, Willis Polk's Western Pacific RR Station (the Spaghetti Factory, today), and yes, Capitol Towers, to Dreyfuss & Blackford's SMUD office building. Yet the same survey would identify 344 notable structures in San Francisco, 81 in Oakland, 174 in Berkeley (incl. UC Campus), 37 in Petaluma, 27 in Sausalito (Polk, Coxhead, up through many of the then current regionalists), and 30 in Stockton.

Thus, for Sacramento to lose what is one of its few, truly significant works of mid-20th century regionalism designed with particular deference to Sacramento's historic milieu and climate, with heritage trees previously preserved in a park-like setting in the heart of the city, would be a cultural loss that the city nor for that matter, the State or the fields of architecture and urban design, can ill afford.

Capitol Towers and Garden Apartments is an important milestone in the evolution of a comprehensive approach to urban environmental design, as uniquely interpreted in its Northern California milieu. It brings forward the Garden Cities movement and Radburn concepts into a new urban context and serves as a reference point for future generations of environmental designers.

I urge the California Office of Historic Preservation and the California Historic Resources Commission to endorse the nomination of Capitol Towers and Garden Apartments to the National Register.

Respectfully Submitted,



Carr Kunze, Housing Professional
B. Architecture, U.C. Berkeley
M.S. Urban Planning, Columbia University, NY.

cc:

Gretchen Steinberg, President, Sac Mod
Roberta Deering, Preservation Director, City of Sacramento
Anthony Veerkamp, Field Director, S.F., Nat'l. Trust for Hist. Pl.
Kris Barkley, AIA, President C.V. A.I.A.
Brian Sehert, AIA, Director C.V. A.I.A.
Richard C. Peters, F.A.I.A., Prof. Emeritus, U.C. Berkeley
William Burg, President, Sacramento Old City Assoc.

MELISSA E. MOURKAS

October 1, 2014

Dear Commissioners:

My name is Melissa Mourkas. I am an architectural historian and a landscape architect residing in the City of Sacramento.

I am writing in support of the National Register Nomination of the **Capitol Towers and Garden Apartments**.

In addition to the applicability of the Criteria as submitted by the applicant(s), I would add under Criterion C/3 *“the work of a master”*. In fact, it is this particular assemblage of well-known and highly respected modern designers that makes it unique and special, and decidedly the work of a master. To quote from page 31 of the original JRP Historic Inventory and Evaluation Report “WBE was one of the best known architectural firms in California during the 1950’s to 1960’s” (JRP 2014). On pages 33-34, the report goes on to note “Lawrence Halprin was one of the most well-known landscape architects in the latter half of the 20th Century. He came to prominence in the 1950’s with his innovative designs for urban environments...”

EXACTLY!

I believe we should recognize the collective accomplishment that is the Capitol Towers. Capitol Towers and Garden Apartments not only won 7 or more awards at the time of its design and construction, it has withstood the test of time as a legacy to the changes occurring in the urban design at that time. It is a site plan and landscape that works. Research by SacMod, Page and Turnbull and others makes clear that the site plan in particular was in the vanguard of both mixed use super-block design and civic spatial design.

I support this nomination as both a resident of the City of Sacramento and as a Historic Preservation professional.

Sincerely,

Melissa Mourkas ASLA

References:

JRP 2014—JRP Historical Consulting, LLC. *Historical Resource Inventory and Evaluation Report, Capitol Towers Apartments*. May 2014.



September 24, 2014

State Historic Resources Commission
P.O. Box 942896
Sacramento, CA 94296-0001

Re: Nomination of Capitol Towers to the National Register

Dear Commission Members

Founded forty years ago, the Sacramento Old City Association is a 501©4 dedicated to good planning and the preservation of historic resources in the City of Sacramento. Our board is pleased to send this letter in support of the nomination of the Capitol Towers site, including all buildings and surrounding landscape, to the National Register of Historic Places.

Built between 1958 and 1965, Capitol Towers is one of the first redevelopment projects in the country. It was designed by some of Northern California's the most prominent Mid-Century Modern architects and played a significant role in the development of our city. We are grateful to SacMod for bringing this nomination forward and eagerly anticipate the inclusion of Capitol Towers in the National Register.

Thank-you for this opportunity to submit comments.

Sincerely,

Karen Jacques
Preservation Chair
Sacramento Old City Association

Crain, Amy@Parks

From: Willis-Hunter, Twila@Parks
Sent: Friday, August 22, 2014 9:38 AM
To: Burg, William@Parks; Crain, Amy@Parks; Correia, Jay@Parks
Subject: FW: Preservation Project/Development Proposal

Hello Registration Unit,

Could you read the email below. Thanks.

Twila Willis-Hunter
Executive Secretary
Office of Historic Preservation
TEL: 916.445.7052
FAX: 916.445.7053
CELL: 916.869.8100
E-Mail: thunter@parks.ca.gov
WEB: www.ohp.parks.ca.gov

Note: My new email address is Twila.Willis-Hunter@parks.ca.gov.
Please update your records for future use.

From: OHP, CALSHPO@Parks
Sent: Friday, August 22, 2014 9:29 AM
To: Willis-Hunter, Twila@Parks
Subject: FW: Preservation Project/Development Proposal

From: Leslie Medina |
Sent: Thursday, August 21, 2014 7:40 PM
To: OHP, CALSHPO@Parks
Subject: Preservation Project/Development Proposal

Dear Commissioners:

I am a long time resident of Sacramento - and someone who cares greatly about preservation.

Capitol Towers and Garden Apartments at the "N" Street Superblock is functioning just as it was planned and proposed many years ago as a great central city neighborhood. I want to preserve and protect the buildings, the open space and the functioning central city neighborhood.

I don't want to see Kennedy Wilson destroy the central city neighborhood as they sell parcels to developers. All KW wants is to gain approvals for the tentative subdivision map to subdivide this superblock into 6 parcels.

Our city has lost too many of its significant landmarks. Don't let this happen again.

Capitol Towers & Garden Apartments is an exemplary example of Mid-Century Modern architecture and urban garden apartment living designed as a mixed density development in a park like setting, by renowned architectural firm of Wuster, Bernardi and Emmons and completed in 1961.

Do not let these land speculators from Southern California win. Protect and preserve this central city neighborhood.

Thank you for your consideration,
Leslie Medina

Leslie Medina

From: Hilary West |
Subject: RE: Support for SacMod Capitol Towers/Garden Apartments Preservation Nomination
Date: August 20, 2014 at 8:12 PM
To: calshpo@parks.ca.gov
Cc: SHansen@cityofsacramento.org

Dear Office of Historic Preservation Staff :

Capitol Towers and Garden Apartments at the "N" Street Superblock is functioning just as it was planned and proposed 53 years ago. It is a great central city neighborhood — and I would add, one of the few in Sacramento.

The new owners, Beverly Hills land speculators Kennedy Wilson, hired JRP Historic Preservation Consultants to evaluate the historic significance of this complex. Unfortunately, JRP's report contains dozens of inaccuracies. Further, the conclusions are based scant evidence and designed to only meet the needs of the KW's vision for Sacramento - not the facts or the public interest.

Sacramento Modern, a volunteer, non-profit organization, has completed a National Register nomination. It is honest and accurate and is based on careful review and professional study.

I am concerned that whatever KW does, they will not develop the property, they are not developers. What they will do is to acquire demolition permits to take out over 200 trees, some heritage trees, and demolish the historic garden apartments. Once they are gone — they're gone.

The result will be our city will loose a beautiful, functioning and historic neighborhood where some of Sacramento's and the Capital's interesting historical figures lived.

You have worked to save this type of important neighborhood and heritage buildings before. It's time to step-up again. I would propose to you that our state has lost too many of its significant landmarks. **This significant historic redevelopment project in a superblock will never be duplicated again.**

Capitol Towers & Garden Apartments is an exemplary example of Mid-Century Modern architecture and urban garden apartment living designed as a mixed density development in a park like setting, by renowned architectural firm of Wuster, Bernardi and Emmons and completed in 1961. Even 40 some odd years later, it is an oasis in the middle of the downtown.

Do not let these land speculators make this historic decision for us. California needs to save it's heritage. We're California, and we work to protect and preserve our history.

Hilary West

August 19, 2014

OFFICE OF HISTORIC PRESERVATION
1725 23rd Street, Suite 100
Sacramento, CA 95816

RE: Commons Project

Office of Historic Preservation:

I am a long time resident of Sacramento - and someone who cares greatly about preservation.

Capitol Towers and Garden Apartments at the "N" Street Superblock is functioning just as it was planned and proposed many years ago as a great central city neighborhood. I want to preserve and protect the buildings, the open space and the functioning central city neighborhood.

I don't want to see Kennedy Wilson destroy the central city neighborhood as they sell parcels to developers. All KW wants is to gain approvals for the tentative subdivision map to subdivide this superblock into 6 parcels.

Our city has lost too many of its significant landmarks. Please don't let this happen again.

Capitol Towers & Garden Apartments is an exemplary example of Mid-Century Modern architecture and urban garden apartment living designed as a mixed density development in a park like setting, by renowned architectural firm of Wuster, Bernardi and Emmons and completed in 1961.

Do not let these land speculators win. Protect and preserve this central city neighborhood!

Best regards,



Jerry Coleman

date: 20, August 2014

to: Carol Roland-Nawi, Ph.D, State Historic Preservation Officer
California State Office of Historic Preservation
1725 23rd Street, Suite 100
Sacramento, CA 95816

re: Letter of Support for the Nomination for Capitol Towers to the National Register of Historic Places

Dear Ms. Roland-Nawi,

My name is Pierluigi Serraino; I am a practicing architect and author of books on mid-century modern architecture. "Modernism Rediscovered" (Taschen, 2000) and "NorCalMod: Icons of Northern California Modernism" (Chronicle Books, 2006) are two titles of mine dealing with the extraordinary legacy of post-war architecture in the Golden State.

I am writing to you to support the nomination of Capitol Towers in Downtown Sacramento to National Register of Historic Places. The cast of characters that designed this project is nothing short of exceptional. William Wilson Wurster was the power broker of a great many key events in the unfolding of the modernist trajectory in Northern California. Landscape architect, Lawrence Halprin, designed the master plan for Sea Ranch. Edward Larrabee Barnes left his distinctive mark in the New York skyline through his Citicorp highrise. These are but a few of the protagonists giving their design signature to the Capitol Towers scheme.

Between 1959 and 1965, the years of construction of Capitol Towers, similar housing experiments were implemented across California. Among the most notable are the Golden Gateway Apartments in San Francisco, and Park La Brea in Los Angeles. The common denominator of these urban schemes was a balanced approach of higher density and choreographed nature. Under the mounting pressure of a rising population attracted to the mirage of California living, architects and urban planners endeavored to conceive concrete responses to the growing post-war cities.

Consciousness of the momentous importance of California Modernism is on the rise nationwide. The nomination of the Capitol Towers to the National Register of Historic Places would constitute a culturally affirming statement that modern architecture was practiced responsibly and in a learned fashion all across the state, and not just in Greater Los Angeles and the Bay Area.

pierluigi@pierluigiserraino.com
www.pierluigiserraino.com

Sincerely



Pierluigi Serraino, AIA

**pierluigi
serraino
architecture**

Richard C. Peters, FAIA

August 4, 2014

Dr. Carol Roland-Nawi, State Historic Preservation Officer
OFFICE OF HISTORIC PRESERVATION
1725 23rd Street, Suite 100
Sacramento, CA 95816

via: calshpo@parks.ca.gov

Re: Support of Nomination for Capitol Towers and Garden Apartments to the National Register of Historic Places

Dear Dr. Roland-Nawi and staff:

I wish to extend my support of the nomination to the National Register of Historic Places Registration Form for Capitol Towers and Garden Apartments, located at 1500 7th Street, Sacramento, CA 95814. I am Professor Emeritus of Architecture at the University of California, Berkeley, and co-authored with Caitlin Lempres Brostrom, "The Houses of William Wurster: Frames for Living", released in 2011.

Capitol Towers was California's first residential urban renewal project. There are extraordinarily few such projects—perhaps a handful—designed by teams of the very best architects, planners and landscape architects of the era. These developments comprise a unique approach to urban form giving. Some are now threatened with destruction just for the architectural space creating and saving function that they have performed.

As referenced in the nomination, Capitol Towers is an early example of Wurster Bernardi and Emmons' work in multifamily, market-rate housing. Wurster had earlier produced public housing and war housing designs. This development incorporates many of the ideas that Wurster had been developing in collaboration with his wife, Catherine Bauer, one of the nation's foremost housing reformers of the era. In an Architectural Forum, September, 1949 article William Wurster sets forth some of his ideas as to how the garden apartment or row house can be created with private spaces related "properly to [the] interior living room and kitchen". He noted how such a "system also permits greater density with corresponding savings in utilities and transportation" versus the urban land consuming single family dwelling that dominated post WW II urban development.

At the time of entering into the contract to assemble a team and design Capitol Towers, Wurster had just returned from an extended tour of Europe and Asia, where again he had met with and shared ideas with several close friends of

Scandinavia, including Alvar Aalto, Kay Fisker, and others who had also been advancing concepts of creating private outdoor space in multifamily dwellings.

By this time, Wurster had already been established as the leader of what would be called Bay Area or Northern California regionalism in architecture—an approach which loosely, may also be found in the works of other regionalists, including Aalto and Fisker, as an alternative to the more strict formalism of the International Style as practiced at the time.

Capitol Towers also advances Wurster's approach to regionalism with a design particularly tailored to California's Central Valley climate with less window exposure, the use of large roof eave overhangs, trellises over the sliding glass doors, and historical recall through the verticality of the windows and their placement, reminiscent of Sacramento's vernacular structures of its gold rush era and its Victorians.

In addition to setting forth a regionalist variant of modern architecture in a multifamily venue, Capitol Towers exemplifies Wurster's and his team's concern for context. A feeling for context was a natural component of Wurster's designs and of those who worked with him. Two or three decades later, 'contextualism' would become a more formalized movement in some architectural practices.

Capitol Towers is a very important legacy in California's and the nation's history of architecture, landscape architecture and urban planning in its humanistic approach to housing. Several of its features—balconies, individual patios, trellises over large window areas—rarely used in the U.S. before, would contribute to and become a part of the vocabulary of garden apartment and townhouse design in future decades. Wurster's, Edward Larabee Barnes' and WB&E's collaborators' design comprises a form of artful understatement that easily allows it to be overlooked and misunderstood in today's urban environment. One author entitled a book on Wurster's work, not inappropriately, as an 'everyday modernism'.

Accordingly, I am pleased to endorse this nomination of Capitol Towers to the National Register of Historic Places, as researched and prepared by Page and Turnbull on behalf of Sacramento Modern.

Very truly yours,

A handwritten signature in dark ink, reading "Richard C. Peters". The signature is fluid and cursive, with the first name "Richard" being more prominent and the last name "Peters" following in a similar style.

Richard C. Peters, FAIA
Professor Emeritus of Architecture
University of California, Berkeley

July 23, 2014

Dr. Carol Roland-Nawi – SHPO
Office of Historic Preservation
1725 23rd Street, Suite 100
Sacramento, CA 95816

RE: Supporting the National Register for the Capitol Towers & Garden Apartments

Dear Dr. Roland-Nawi and OHP Staff:

I am writing today to support the Sacramento Modern nomination of Capitol Towers and Garden Apartments to the National Register.

This project is an excellent example of the architecture of the mid-century modern period. From the Sac Mod research and other information, the project was the largest residential undertaking in Sacramento. The Capitol Towers and Apartments project was envisioned and completed by the renown architecture firm of William Wurster, Bernardi and Emmons, as well as the landscape architect Lawrence Halprin. The goal was to make the area a livable urban complex, providing green space, a swimming pool and needed features for residential living.

Today, as you can see, it's a successful, fully mature, beautiful residential neighborhood just a stones throw from the center of downtown Sacramento and the State Capitol.

I should note that the Bridgeway Tower and the Pioneer Tower (senior living high-rise apartments) are neighbors that were built later. These two residential units were part of the original Wurster plans.

This is a unique opportunity to save the very best examples of mid-century modern innovative architecture. Let's not let this slip away just because some land speculators want to make way for poorly planned and unnecessary high-rise buildings and parking lots.

I join with my friends and neighbors and urge the State Office of Historic Preservation to recommend this nomination for the National Register and for immediate preservation.

Sincerely,

A handwritten signature in black ink, appearing to read 'Sophia Cazan', with a stylized, flowing script.

Sophia Cazan

ALAN HESS
ARCHITECT

July 22, 2014

Carol Roland-Nawi
State Historic Preservation Officer
California State Office of Historic Preservation
1725 23rd Street, Suite 100
Sacramento, CA 95816-7100

re: Capitol Towers and Garden Apartments nomination

Dear Ms. Roland-Nawi:

I would like to express my strong support for the nomination of Sacramento's Capitol Towers and Garden Apartments complex for landmark status.

This is a design of both historical and architectural significance, under Criteria A and C. I say this as an architect and historian, author of nineteen books on Modern architecture (often focused on California), and as the architecture critic of the *San Jose Mercury News*.

First, Capitol Towers' historic character: it represents a key but neglected chapter in the story of California's contributions to good urban planning in the midcentury period. A widely held myth is that California in this period was dominated by unplanned sprawl. Capitol Towers' existence disproves this myth; it shows that good architects and good planners created well-designed, workable, and successful developments incorporating high density, diverse housing types, public art, and excellent landscaping, all well-integrated into its urban context.

Capitol Towers should be preserved as a high standard for current development to live up to. It should be celebrated, not demolished.

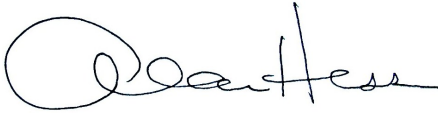
Second, as architecture, the designers of Capitol Towers were among the best and most distinguished of the period. Wurster Bernardi and Emmons was one of the most influential firms of the time, setting high standards for the rest of the profession. Vernon DeMars and Donald Reay were architects who brought a strong architectural sensibility to planning design. Edward Larrabee Barnes was a nationally respected designer. And Lawrence Halprin has long been recognized as the dean of American landscape architects. That such designers would devote

their talents to this project shows their regard for the importance of urban life in California.

An important example of California's design leadership and innovation is at risk. For the sake of recognizing California's extraordinary achievements in good architectural and urban design, and for the genuine livability and urban quality that this historic complex brings to Sacramento, Capitol Towers should be given landmark status.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Alan Hess". The signature is fluid and cursive, with a large initial "A" and a distinct "H".

Alan Hess

July 24, 2014

Carol Roland-Nawi, Ph.D,
State Historic Preservation Officer
California State Office of Historic Preservation
1725 23rd Street, Suite 100
Sacramento, CA 95816

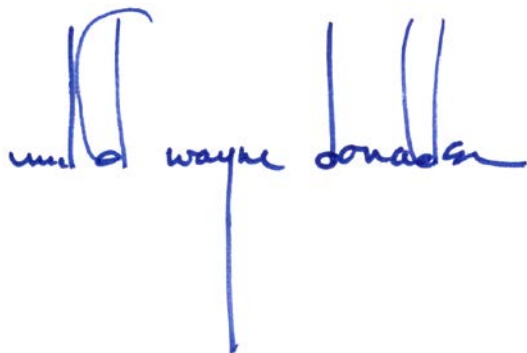
Support Letter for the Capitol Towers to the National Register of Historic Places

Dear Ms. Roland-Nawi,

Capitol Towers and Garden Apartments (Capitol Towers), constructed between 1959 and 1965 on most of a four-block area in downtown Sacramento, California, is significant under Criterion A in the area of Community Planning and Development as the first privately-sponsored urban redevelopment project in Sacramento and in California. Its initial phase of 92 garden apartment units, dedicated in 1960, represents the first implementation of federal urban redevelopment funds in the West.

Capitol Towers is also significant under Criterion C as a well-planned and well-designed example of urban redevelopment housing. Having walked through the complex several times and visiting a friend who used to live in one of the units, its pedestrian-oriented design combination of low-rise and high-rise buildings, integrated landscape features is unique. The site also maintains a strong urban presence while balancing privacy and community for its residents. In addition, it was the first redevelopment project for many of its talented design team that included Wurster, Bernardi, and Emmons, Edward Larrabee Barnes, DeMars & Reay and landscape architect Lawrence Halprin.

The Capitol Towers neighborhood has been a successful mixed-use residential community for 50 years. As past California State Historic Preservation Officer, I fully endorse the Capitol Towers to be nominated to the National Register of Historic Places.

A handwritten signature in blue ink that reads "milford wayne donaldson". The signature is written in a cursive, flowing style. A long vertical line extends downwards from the end of the signature.

Milford Wayne Donaldson, FAIA

Crain, Amy@Parks

From: Correia, Jay@Parks
Sent: Monday, July 21, 2014 12:21 PM
To: Crain, Amy@Parks
Subject: FW: Letter in Support of the Preservation of Sacramento's Capitol Towers

Follow Up Flag: Follow up
Flag Status: Flagged

For you...

Jay Correia
State Historian III
Supervisor, Registration Unit
California State Office of Historic Preservation
916-445-7008

From: Roland-Nawi, Carol@Parks
Sent: Monday, July 21, 2014 10:30 AM
To: Correia, Jay@Parks
Subject: FW: Letter in Support of the Preservation of Sacramento's Capitol Towers

Carol Roland-Nawi
State Historic Preservation Officer
Office of Historic Preservation
Department of Parks and Recreation
916 445-7050

From: Heather David |
Sent: Sunday, July 20, 2014 9:07 PM
To: Roland-Nawi, Carol@Parks
Cc: 'gretchen steinberg'
Subject: Letter in Support of the Preservation of Sacramento's Capitol Towers

Heather M. David

July 20, 2014

Carol Roland-Nawi, State Historic Preservation Officer
California State Office of Historic Preservation
1725 23rd Street, Suite 100
Sacramento, CA 95816-7100

Dear Ms. Roland-Nawi:

My name is Heather David. I am a California native and an advocate for the preservation of the State's mid-century modern resources. I write today in support of the preservation of Sacramento's Capitol Towers residential community.

In addition to the Capitol Towers development being an excellent example of a thoughtful approach to postwar urban renewal, the complex is as attractive and functional today as it was some 50 years ago.

The minds behind the Capitol Towers master plan were arguably some of the best and brightest of their era - William Wurster, Vernon DeMars, Lawrence Halprin, etc. No one can argue against these individual's significant contributions to Modern design, in general, and to California Modernism, in particular.

The Modern approach to urban residential living centered on increasing the quality of life through the effective use of interior space and integrating the indoors with the outdoors. In comparison, it seems that the current trend in urban "renewal" is to compromise quality of life for the pocketbooks of developers and higher tax revenues.

High density development is great for developers. It is great for tax revenues. But is it great for the people who must live in these highly constricted spaces? Please save Capitol Towers. It is not only an iconic example of postwar urban residential architecture, it is HOME to many people.

Sincerely,

Heather M. David

July 16, 2014

Gretchen Steinberg
Sacramento Modern
4910 South Land Park Drive
Sacramento, CA 95822

Ms. Steinberg,

I am writing to provide a letter of support for the nomination of Capitol Towers to the National Register of Historic Places and recognition of the property as a successful urban development with character worth preserving. I do recognize Page & Turnbull prepared the nomination materials being submitted to the State Historic Preservation Office on behalf of Sacramento Modern, and therefore we are responsible for formulating a statement of eligibility. I wanted to take this opportunity, however, to reiterate a few thoughts regarding the signature historical significance of the housing development and the unique planning project situated in our own local environs in downtown Sacramento. It is, I feel, not only important relative to an historic context, but valuable to us as a community seeking the best for our downtown.

As stated in the National Register Nomination application, we find Capitol Towers to possess an exemplary representation of redevelopment housing design by a group of innovative, talented designers between 1959-1965. Specifically, the complex is comprised of a pinwheel arrangement of staggered low-rise units, a high-rise building, and service buildings interwoven into landscape elements, exterior amenities, and shaped outdoor spaces. The result is a delicately balanced environs of urban housing, shaded green zones and social interactive spaces, both private and public. The managed, skillful design is clearly evident today, in good part due to the high level of maintenance at the facility. A walk through the complex, as available to any local making their way through the City grid, is delightful.

This combination of elements in the proportion as originally conceived here are rarely found in today's development, with the extreme pressures on development ratios and financial terms. To drastically alter this site now, as is currently proposed, would be a sorrowful waste of an urban icon in Sacramento. Densification and infill is desirable in downtown Sacramento - but the action here comes at the complete destruction of a successful mixed-density urban housing development. Do we need to repeat the removal of cultural history in order to build our urban centers? Can we not learn from the ills of Redevelopment, as effected to Japanese settlements here in the 1950s, and continue to learn from the best thinking of Modern era architects and planners, as current residents, locals and design practitioners benefit from now? There are better opportunities for high-rise infill at other underutilized, non-historic sites in our city. There could be ways to incorporate some modifications to the Capitol Towers site, in a manner that protects the overall character of the planned community. The first step in doing so is to recognize and systematically identify the existing significance and character, from a local perspective and historic resource perspective. I hope our Preservation and Planning Commissioners will respond with careful consideration in this situation and support our opinion Capitol Towers is an historic property with unique urban qualities worthy of preservation. Placemaking is here at Capitol Towers in its current form.

Sincerely,



Melisa Nelson Gaudreau, Director- Sacramento Office, Page & Turnbull, Inc.

ARCHITECTURE
PLANNING & RESEARCH
PRESERVATION TECHNOLOGY

July 16, 2014

Dr. Carol Roland-Nawi, State Historic Preservation Officer
Office of Historic Preservation
1725 23rd Street, Suite 100
Sacramento, CA 95816

via: calshpo@parks.ca.gov

Re: Support for Capitol Towers and Garden Apartments to the National Register of Historic Places

Dear Dr. Roland-Nawi and staff:

I am writing in support of Capitol Towers and Villas to the National Register of Historic Places. This project is part of a four block "super block," assembled and originally planned for development by the City's Redevelopment Agency. The 12 story building, Pioneer Tower, that I live in was also part of that design. Pioneer Tower is a senior living environment.

The Capitol Tower project qualifies for inclusion into the National Registry of Historic Places. What we, as local residents, cherish are the mature trees and sweeping tree canopies, as well as the well-placed Villa Apartments, the swimming pool, leisurely walkways, sparkling fountain and quietness. We seniors think of this special place as our oasis or park. We encourage you to walk through the "super block" area in order to appreciate this 50+ year old grand lady of parks.

What upsets us is that should the owners, Kennedy Wilson LLD, tear out the Villa Apartments, our heritage trees, and sheltered walkways, the downtown area will lose a unique and successful living environment created by award-winning architects. We will never acquire another, as how many property owners are willing to build another tree-canopied beauty in downtown Sacramento?

Thank you for considering the nomination.

Sincerely,


Judy Kay Stanley

Dr Carol Roland-Nawi –SHPO

July 15, 2014

Office of Historic Preservation

1725 – 23rd Street-Suite 100

Sacramento, CA 95816

RE: SUPPORTING THE NATIONAL REGISTER FOR THE
Capitol Towers & Garden Apartments

Dear Dr Roland-Nawi and OHP Staff:

This 'super block' project is an example of the architecture of our recent past-the mid-century modern period. It was the largest residential project in the Redevelopment process in Sacramento that began in 1958. Redevelopment was 'revitalizing' the core of many other major cities in the US to eliminate slums and blight. 223 blocks were demolished on the west end of Sacramento.

The effort and concern by the renown architecture firm of William Wurster, Brnardi and Emmons, as well as the landscape architect Lawrence Halperin, to make Capitol Towers a livable urban complex, providing green space, a swimming pool and needed amenities in this project. It is today a healthy, functioning, beautiful residential neighborhood just two and half block from the center of downtown Sacramento.

It has been modified or altered very little in the last 50 years. The Bridgeway Condominiums and the Pioneer Tower, a senior living high-rise apartments, are not part of Capitol Towers and were built later in the 60's. However, they were in the original Wurster plans.

I urge the State Office of Historic Preservation recommend this nomination to the Keeper at the National Parks Service.

Yours in Preservation,

Kathleen Green, a Concerned Preservationist

TELEPHONE 916 453-1234
FACSIMILE 916 453-1236

3540 FOLSOM BOULEVARD
SACRAMENTO, CALIFORNIA
95816-6699

DREYFUSS & BLACKFORD

ARCHITECTS

15 July 2014

Carol Roland-Nawi, Ph.D
State Historic Preservation Officer
California State Office of Historic Preservation
1725 23rd Street, Suite 100
Sacramento, California 95816

Re: Capitol Towers Nomination to National Register of Historic Places

Dear Mrs. Roland-Nawi:

We are writing in support of the nomination of the Capitol Towers complex in Sacramento for National Register of Historic Places. As one of the very first redevelopment projects undertaken in the 1950's, this project was significant for Sacramento and the State of California. The design, execution and realization of this project were all pioneering actions by remarkable visionaries and designers. The redevelopment of the West End in Sacramento is well documented, acknowledged as a pioneering redevelopment effort in the state. The construction of the first phase of 92 low-rise garden apartments in 1960 represented the first private investment in urban redevelopment housing in California. FHA provided the mortgage insurance and imposed certain design requirements. Capitol Towers was the only "federally assisted slum clearance development project to be constructed in the western states," according to *The Sacramento Bee*, March 27, 1958 front page article.

Capitol Towers is a durable and successful interpretation of urban renewal planning of the 1950's era, drawing from the 'City Beautiful Movement' in Europe (led by Le Corbusier) and the 'Garden City' urban planning concepts developed in the United States. Fifty years after opening, it remains very nearly intact - with mature landscape, well maintained buildings and even the original public art. That it continues to be fully leased and highly sought after is a testament to the character and quality of the design.

The design team that created this landmark was quite extraordinary. This is a rare example of early work for each of these esteemed practitioners. Wurster Bernardi Emmons; DeMars & Reay; Lawrence Halprin; Edward Larrabee Barnes - all seminal practitioners in the 20th century, shaping our western cities and influencing several generations of architects and planners. That they came together to collaborate on this ground-breaking urban project is a minor miracle in itself. Each firm went on to build highly successful portfolios of lasting influence.

The design success of this project is well documented, having received numerous regional, state and national design and planning awards. A key element of this inspired parti is the careful balance of low-rise and high-rise structures on the site. The mix of building types turned out to be crucial to the success of Capitol Towers. History shows us that many contemporary redevelopment projects with dense, monolithic high-rise buildings have not fared so well. Indeed a number of infamous projects from this period were deemed civic failures and were demolished well before their time. Capitol Towers, on the other hand, presents a vibrant and varied community with ample landscape and discreet vehicle parking. It remains a lively and desirable living place to this day. We believe this to be a unique, vital cultural and architectural example with significant historical value. As a firm, we believe it is well worth preserving in our community.

Very Truly Yours,
Dreyfuss & Blackford Architects



Kristopher Barkley, AIA, Vice President

July 10, 2014

Dr. Carol Roland-Nawi, State Historic Preservation Officer
OFFICE OF HISTORIC PRESERVATION
1725 23rd Street, Suite 100
Sacramento, CA 95816

via: calshpo@parks.ca.gov

Re: Support Nomination for Capitol Towers and Garden Apartments to the National Register of Historic Places

Dear Dr. Roland-Nawi and staff:

I am writing in support of the nomination of Capitol Towers and Villas to the National Register of Historic Places. This project is part of a four block “super block”, assembled and originally planned for development by the City’s Redevelopment Agency. The condominium building in which I am an owner (Bridgeway Towers at 500 N Street) was also part of that design.

I have been the beneficiary of the long range thinking and expert architecture employed in designing this area over 50 years ago. I have lived in this community since 1989 when I purchased a condominium, and I have found it to be safe, scenic, comfortable, with housing and other amenities available to 750 households in four square blocks. The complex mixes high rise and low rise, rental and ownership units, with large trees and open lawns, and many pleasing views. This has produced a densely populated area that also is very livable, and maintains its value very well, in large part because of the presence of an urban forest with large canopy trees. This forest and associated low-rise apartments are threatened by removal.

Sacramento Modern has engaged in a heroic effort to document and educate the community, particularly your agency, about the unique and enduring values of this area. I applaud their effort to list Capitol Towers and Garden Apartments on the National Registry of Historic Places.

The historic designation recognition could help further to alert the community and our city government that healthy neighborhoods should not be disposable for the “next big thing”. If they endure and thrive because they were designed and planned by leading architects, they deserve respect and protection for the values they bring to the city as a whole and the downtown area in particular.

Thank you for considering this nomination.

Sincerely,



Judith Lamare

c: Sacramento Modern



Carol Roland-Nawi, State Historic Preservation Officer
California State Office of Historic Preservation
1725 23rd Street, Suite 100
Sacramento, CA 95816-7100

July 14, 2014

RE: National Register Nomination of Capitol Towers, Sacramento, CA

Dear Ms. Roland-Nawi:

The Cultural Landscape Foundation would like to express our strong support for the nomination of Capitol Towers in Sacramento, California to the National Register of Historic Places.

Capitol Towers, a part of the larger Sacramento Redevelopment Agency's Capitol Mall Redevelopment Project, is an important example of the early planning work of its talented design team which included landscape architect Lawrence Halprin and architects Wurster, Bernardi and Emmons, Edward Larrabee Barnes, and DeMars & Reay. The Capitol Towers development, which won several awards upon its completion in 1965, is an early example of successful urban renewal which served as a model, both for the designer's later works and for further redevelopment projects in California.

Halprin prominently featured the development in his pivotal book *Cities*, where he highlighted elements of the project including the plaza, screening wall, and site plan. He characterized the project as "the first living space to follow the redevelopment process" and outlined the movement notation sequence (a pre-cursor to his RSVP cycles) for the project's circulation patterns. The project was also featured as an early example of urban redevelopment in *Lawrence Halprin: Changing Places*, a catalog of the landscape architect's work published in 1986. The project's success is largely due to its unique integration of architectural and landscape design elements—aided by its thoughtful incorporation of pedestrian circulation, gardens, recreational areas and a plaza at its core. The complex as a whole is a unique historic resource, and significant example of the architecture of its time.

The Cultural Landscape Foundation's mission is to provide people with the ability to see, understand and value landscape architecture and its practitioners, thus broadening the support and understanding for cultural landscapes nationwide. Capitol Towers plays an important role in the history of Sacramento and California—serving as an example for the redesign of urban areas throughout the state in the second half of the twentieth century and I strongly urge you to approve the nomination of Capitol Towers in Sacramento to the National Register, a worthy designation for this important cultural landscape.

Sincerely,

Charles Birnbaum, Founder and President
The Cultural Landscape Foundation
1711 Connecticut Avenue, NW, Ste 200
Washington, DC 20009

July 10, 2014

Carol Roland-Nawi, State Historic Preservation Officer
California State Office of Historic Preservation
1725 23rd Street, Suite 100
Sacramento, CA 95816-7100

Dear Ms. Roland-Nawi,

I am writing to offer my support for the nomination of Capitol Towers in Sacramento, California to the National Register of Historic Places. As the first privately sponsored redevelopment project in California, the site is an important example of 1960s planning, landscape and architectural design. Capitol Towers represents the successful collaboration of master designers Wurster, Bernardi, and Emmons, Edward Larrabee Barnes, DeMars & Reay and Lawrence Halprin, to create a pedestrian-oriented housing complex that offers a unique and innovative example as compared to its more car-centric counterparts of the redevelopment era. The complex is an important early example of large-scale neighborhood planning by the collaborating design team, who went on to design other noteworthy residential complexes in California in the 1960s.

Neighborhoods of the modern era are increasingly threatened as they exceed the 50 year threshold and many examples have already been lost due to development pressures. Consider the example of Parkmerced in San Francisco, a significant modern housing complex built by the Metropolitan Life Insurance Company with landscapes by Thomas Church and buildings by Leonard Schultze and Associates. Parkmerced was found to be eligible for listing on the National Register, but was never officially listed and was approved for demolition in 2011. The site presently awaits its demise. As important examples of modern-era designs are increasingly threatened, it is essential that they are acknowledged for their contribution to our shared history through designation.

The submitted National Register nomination is well-research, well-articulated and thorough in its analysis of the site's eligibility for listing. As a planner and cultural landscape historian who specializes in modern-era landscapes, I concur with the findings of the nomination that Capitol Towers is an important example of its type, period and the work of masters and is worthy of designation on the National Register.

Respectfully,



Gretchen A. Hilyard

April 15, 2015

Dear Chair Fuller and Preservation Commissioners:

I am writing to urge you to support Capitol Towers listing on the Sacramento Register, and ultimately the National Register. I also ask that you encourage the Planning Commission to consider the preservation of this existing community as a higher priority than increasing the quantity of high rise housing at THIS site. Please urge the Planning Commission to require the developers to incorporate the historic buildings and landscape into their new plans, and to find a way to preserve the existing community of Capitol Towers.

As a councilmember and later as Mayor, I represented this neighborhood for 19 years. I became very familiar with its residents and businesses and its assets and significance to downtown Sacramento. It's not just an apartment complex, as I'm sure you noticed if you've visited. It's a community of very satisfied residents and business owners who love and contribute to the downtown vibrancy, and have for decades. It is a site which allows the disabled residents to freely navigate from their homes to restaurants, shopping, and other services, without having to cross a street. And for the many employed residents, the adjacency of light rail and the many employers in the area, including the State, means they can get to work without driving. I found it to be one of the safest and happiest neighborhoods in the city. It seems unfair to disrupt this neighborhood just because they are renters. This wouldn't and couldn't happen in another residential block in downtown Sacramento, because the residential property owners wouldn't allow it.

I support higher density and worked hard for years to encourage more housing in the central city. I'm pleased to see the interest and demand for downtown living. But this is an existing neighborhood, and is already one of the densest housing in the central city. Its success should serve as a model for other development, not a reason to take it down. Within just a few blocks are a half dozen empty or underutilized

blocks that would be so much more appropriate for this development. The general plan specifically calls for "protection of existing neighborhoods" (see quote below), based on input from residents throughout Sacramento.

Sacramento is a special city, and part of what it makes it so special, is that we have preserved what makes it unique. One of my goals as mayor was to preserve the unique historic buildings and neighborhoods in downtown. That effort is part of what has positioned Sacramento for its current round of progress. It's part of what has attracted residents and businesses to locate here. Capitol Towers, with its stability, walkability, tree canopy, and sense of community is a special place that should also be preserved.

Thank you for considering my comments.
Heather Fargo
former Mayor of Sacramento (2000-2008)

from the City's General Plan -"Protect Established Neighborhoods"
"The City shall preserve, protect, and enhance established neighborhoods by providing sensitive transitions between these neighborhoods and adjoining areas, and by requiring new development, both private and public, to respect and respond to those existing physical characteristics, buildings, streetscapes, open spaces, and urban form that contribute to the overall character and livability of the neighborhood. (RDR)"

April 13, 2015

Members of the Sacramento Preservation Commission
Members of the Sacramento Planning and Design Commission
300 Richards Boulevard, 3rd Floor
Sacramento, CA 95811

Dear Commissioners and Staff:

We strongly urge you to vote in support of the nomination of Capitol Towers and Garden Apartments (Villas) as an Historic District, including its Contributing Resources, to be listed in the Sacramento Register of Historic & Cultural Resources, Landmarks, and Historic Districts.

Preservation of some 200 mature trees on site, with replacement in kind as part of the natural life-cycle, would serve to advance Sacramento's leadership role throughout the region, state, and nation as the preeminent City of Trees. As California's capital, with its rich history, the City's preservation of this historic site would serve to expand the stature of Sacramento for its significant architectural heritage.

Development of this 11-acre site in the mid-twentieth century has become celebrated as an important example of *Northern California Regionalism* and humanism. It remains a significant achievement among the few remaining grand urban spaces of redevelopment after World War II. It was envisioned and pioneered as human scale, with landscape and architecture designed to enhance the livability for residents, neighbors to the site, and the larger community, thereby providing a public benefit to the entire City of Sacramento.

Collaboration for this design was an important accomplishment and included: landscape architect Lawrence Halprin, recognized nationally and internationally as an innovative leader in the field; and master architect Edward Larabee Barnes, recipient of Gold Medal awards from the American Institute of Architects. The inclusion of the sculptural wall by artist Jacques Overhoff contributed to the total integration of art, landscape, architecture, and urban design for affordable housing, and which, above all, contributes to "a sense of place," so vital to the human spirit. The influence on Capitol Towers by internationally recognized master architect William Wilson Wurster also is observable, although less documented, and whose contributions appear to be born out by his appointment to the Capitol Building and Planning Commission of Sacramento after completion of the initial design phase of Capitol Towers.

The City's investment in preserving Capitol Towers and its Contributing Resources as an Historic District is an investment in maintaining the City's role as a leader in livable, urban design that will continue to benefit residents through affordable housing, multi-family residences, and as a model for generations to come.

We urge that you give every consideration to its preservation and placement in the Sacramento Register of Historic & Cultural Resources.

Sincerely yours,

Caroline Goddard
President
East Sacramento Partnerships for a Livable City