

December 5, 2022

Mayor Kassakhian and the Glendale City Council  
City of Glendale  
via email

**RE: Agenda Item 1 Stage I Preliminary Design Review (Case No. PDR 2212056)**

Dear Mayor Kassakhian and Members of the Glendale City Council:

It is obvious that this is a prime site for a substantial housing project, and Glendale needs housing. It is heartening to see 15% very low-income units are proposed onsite. No developers should be allowed to pay in-lieu fees to provide affordable housing elsewhere, which amplifies inequities associated with segregation by income. In addition, the proposed park would offer an important amenity for South Glendale residents.

These are the good points. Unfortunately, the proposed project does not “support...the community’s image and the City’s vision of a sustainable downtown by enlivening the downtown district and activating the public realm with a mix of public/private, residential and live/work uses” (Exhibit 1, p. 4). Nor does it do much to heal the myriad design deficiencies of recent bland downtown housing projects farther north on Central Avenue. The design of the Sears project is a particular shame, because A. C. Martin is such a longstanding and reputable architecture firm. One question Council needs to ask itself: why do top southern California architects feel that they can bring their B or even C game to our city? Why do we accept this?

For a project of this magnitude only ground-level retail will truly “activate” the streetscape in the ways demanded by the Downtown Specific Plan. Creative use of the existing alley could help as well; the alley is inexplicably proposed to be vacated, essentially giving 7,200 square feet of city land to the developer. The minimal, virtually unusable public space on the main site is by no means worth such a trade.

This project is too big and too important for this design to be approved even at the Phase 1 round; it should return to Council for another look before the developers finalize a design with staff for submission to the DRB.

**Wholesale Demolition Is Not “Sustainable”**

A *sustainable* project would reuse as much of the existing building and materials as possible rather than sending however many thousands of tons of construction debris to landfill. Indeed, for this reason the DSP promotes reuse of existing buildings. Council should first insist that we discover whether the art deco façade of the Sears building exists underneath the stucco shell, which is highly likely. The City Council has discretion to ask this. There is no such thing as “by right” development in Glendale.

If the art deco façade is in place, that information should guide future development plans. An adaptive reuse project would be far more environmentally sustainable, and it would also revive a landmark that would anchor a development the City could be proud of. The number of units need not be reduced, and a contemporary design would

still be appropriate. As the Staff Report notes, the height limit for a Density Bonus project here is 245 feet. When Bradley Calvert arrived several years ago, he argued persuasively in favor of taller, more slender buildings in the downtown with more open space around them. This project would have benefited from that vision. The City would be much better served by retaining the tower and exceeding the proposed height elsewhere on the project than by sticking with the virtually unrelenting 95-foot height, which is oppressive despite efforts to modulate and separate the building.

### **This Project Needs to Include Retail Businesses**

The failure of so much downtown design in Glendale is a result of buildings' failure to engage pedestrians at street level. This project does precious little to avoid this fate. The Staff Report claims that the "recreational rooms (e.g. fitness center, business lounge, game room, etc.), live-work units, and 1- and 2-bedroom residential units" represent "a mix of uses at the ground floor [that] is consistent with the DSP requirements to provide active and engaging uses at street-level" (Staff Report, December 6, 2022, p. 8). Surely not! Residences are not engaging uses at street level; nor is the inevitably empty business lounge or a gym. Live-work spaces tend to be oriented around professional offices, which are not dynamic public spaces. The ground floor is project/resident-focused to its bones and demonstrates indifference to the pedestrian (figure 1 and 2).



Figure 1. Sheet A7.3. Central Ave. elevation, facing southeast. Note that the large "building separation" is at the second story level; the wall below at ground level provides almost no relief to the pedestrian. There are glass walls at a small portion of the façade, but a business lounge or gym reserved for tenants is not "active and engaging" for those outside.



Figure 2. Sheet A7.1, excerpt. Close-up of above, emphasizing pedestrian-level experience of Central Ave.

## Design

I do appreciate staff's efforts to improve design through the revised DSP. The problem is that it's hard to do so through a checklist of features. Just because a project uses multiple finishes, and stucco runs the gamut of color from white to dark gray, that does not make for a high-quality design, which this project at its size, mass and scale must be. The Staff Report repeatedly claims this project uses high-quality materials, stating, for example, that "the design of the street-level façades are appropriately detailed with human-scaled high-quality materials" (p. 7). The proposed materials are, on the contrary, very basic and low cost: Trespa laminate clad panels, Hardie Plan fiber cement siding, plaster finishes brick veneer, metal panels, and cement tiles. "Human-scaled" to me suggests something natural—if it doesn't mean that, staff should define the term. Glendale should demand much more for a block-long and block-wide project. Granite, marble, sandstone are high-quality natural materials that fit well in contemporary design. Using "wood-looking finish" (sheet A0.20) at street level should not be tolerated.



Figure 3. Sheet A4.5. California Street elevation. The Staff Report describes the project design as "unique and identifiable." (p. 8). I am unpersuaded. Modulations on this side, apart from the garage entrance are minimal. The roof overhang negates the benefit of the recessed eighth floor balconies, which are described as "major modulations, as are the projecting balconies."



Figure 4. Soviet-era apartments in present-day Russia. Note that the roof heights show greater variety than those proposed at the Sears site, and it is not without modulation. Source: Quora

## Vacation of the Alley

The vacation and demolition of a usable alley ignores the evidence that alleys have experienced significant rebirth in urban design over the past few decades. In “The Forgotten and The Future: Reclaiming Back Alleys For A Sustainable City” (*Environment and Planning* 42 (2010), the authors explain:

City planners recognize the potential of alleys to revitalize and enrich the fabric of residential communities and commercial districts. ‘Green’ alley programs and projects have been initiated in Chicago, Vancouver, Baltimore, Los Angeles, and cities in Europe (Cassidy et al, 2008). The late Jane Jacobs (1961) recognized the value of alleys as network connectors, claiming they would make for healthier urban tissue. Like other public space, alleys may be useful to community building and organizing efforts in the inner city (Cassidy et al, 2008)...New Urbanists such as [Andres] Duany (2001) advocated for alleys in new residential developments...claiming that alleys would encourage pedestrian activity and neighborly interaction” (Halper, 2001; Katz, 1994; Swaney, 2001) (p. 2876).

This academic study concluded that “alleys form a significant part of the urban landscape and image for many residents. They could constitute a vanguard strategy in the design of more sustainable cities-- human settlement patterns that promote social and ecological justice, economic vitality, and ecosystem integrity, while minimizing resource consumption and waste generation” (p. 2891). Despite such evidence, Glendale is vacating alleys for residential developments as often as possible. The alley would provide urgently needed breathing room within the project. By retaining the alley the project would not have to try so hard to look like multiple buildings. Trading a public alley with a privately owned paseo is not a responsible solution and is unfair to the residents of Glendale.

## Transfer of Development Rights

The Staff Report refers to a future TDR agreement that cannot be made yet, because the City has no mechanism for doing so, but on which the entire project with park seems to depend. Apparently the developers want some unknown “community benefit” to create the park. How can Council vote to approve Stage 1 preliminary design review when such an important piece is missing? Staff have lectured residents when they have argued for design decisions based on clear Council direction regarding the handling of SB 1818, because staff have not yet brought specific language back to Council. I can’t help but note the hypocrisy of recommending this project to Council based on action the Council may take in future but very well may not.

## Conclusion

Obviously this site will be developed with a great deal of housing, and 15 percent will be affordable, which is great. But there are very specific and obvious flaws with the proposed project and important missing information, including the state of the existing Sears Building and the nonexistent Transfer of Development Rights program, which preclude you taking action at this time. Residents deserve a transparent process, which begins with NOT scheduling these hearings for 3 pm, and ends with asking the applicants to return with better materials, site planning, and retail. Glendale residents deserve better than this, and I believe you know this.

Thank you for your consideration.

Sincerely,

*Catherine Jurca*  
Catherine Jurca