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www.GlendaleHistorical.org

March 28, 2016

The Honorable Ara Najarian and Members of the City Council
City of Glendale
613 East Broadway, Suite 200
Glendale, CA 91206

Dear Mayor Najarian and Members of the City Council:

On behalf of the Board of Directors of The Glendale Historical Society (TGHS), I would like to thank you for the opportunity to comment on the multi-family residence project at 126, 128 & 132 S Kenwood St.

Established in 1979, TGHS is a non-profit organization with more than 600 members dedicated to the preservation of Glendale's history and architectural heritage through advocacy and education.

We are pleased that a historic resources assessment was prepared on the subject property, given that the City had not reevaluated 128 S Kenwood since an intensive evaluation was prepared in 2007, and no comparable evaluation of the other buildings was ever prepared. There has been a great deal of new development downtown since 2007, and many older single-family houses have since been demolished, and a reconsideration of eligibility was therefore warranted.

Unfortunately, we believe that the historic resources assessment prepared by Arroyo Associates is fundamentally flawed, a new assessment should be performed, and the subject property is eligible for listing on the Glendale Register under Criteria 2, 3, and 5 of Glendale Municipal Code Section 15.20.050, which would trigger review and consideration under CEQA before the buildings on it could be demolished. The Arroyo Associates assessment fails to adequately document the history and significance of the subject property, does not correctly apply the criteria for eligibility for designation, and fails to comply with state-established minimal standards for local surveys.

The Arroyo Associates assessment contradicts itself in its assessment of the subject property's eligibility under Criterion 3. Criterion 3 states that "[t]he proposed historic resource embodies the distinctive and exemplary characteristics of an architectural style, architectural type, period,

The Glendale Historical Society (TGHS) advocates for the preservation of important Glendale landmarks, supports maintaining the historic character of Glendale's neighborhoods, educates the public about and engages the community in celebrating and preserving Glendale's history and architectural heritage, and operates the Doctors House Museum. TGHS is a tax-exempt, not-for-profit 501(c)(3) organization, and donations to TGHS are tax-deductible to the extent permitted by law.

or method of construction; or represents a notable work of a master designer, builder or architect; or possesses high artistic values” (emphasis added). The consultant found that “the three residential structures ... embody the key distinct architectural features of their style” (page 24). The consultant goes on to declare, improperly, that because the structures “do not exhibit high artistic and articulated design and workmanship, or unique features,” the property does not meet Criterion 3. By misreading “or” for “and,” the consultant incorrectly dismisses her own finding that the property meets Criterion 3 because it doesn’t meet all the sub-criteria. It doesn’t have to, as the use of “or” means only one of the three sub-criteria needs to be met, not all three.

The subject property also meets Criterion 2: “The proposed historic resource is associated with a person, persons, or groups who significantly contributed to the history of the nation, state, region, or city.” While it is true that “[b]ased on the research ... contained in this report, the subject property does not meet this criterion” (page 24), the research was inadequate.

132 S. Kenwood was the home of the Reverend Clifford A. Cole; he, his wife, and two children are recorded as residing at that address in the 1920 U.S. Census. Rev. Cole continued to live there until approximately 1963. Born in 1881, Rev. Cole was, according to the *Glendale Community Book* (1957) “a prominent churchman” who “has been well identified with both religious and civic activities in the Southland since he first came to Glendale as minister of the Central Christian Church in 1917,” a position he held until 1937. In 1939, Dr. Cole was named State Secretary of Christian Churches, and retained that position until 1956. He was energetically engaged in the community, serving on the Parks Commission for three decades, notably presiding over Sunrise Easter Service at Forest Lawn Memorial Park for more than two decades (beginning in 1929) and wrote a nationally syndicated newspaper column on religion published in the *Glendale News Press*. Cole was a longtime member of the boards of directors of numerous church and civic groups, including Community Chest and Chapman College. As an officer of the local Kiwanis, Cole was instrumental in funding the Glendale YMCA and chaired a successful bond issue drive for Glendale schools and City Hall. In 1946 he received a citation from the City Council of Glendale, Parks & Recreation Commission, Forest Lawn and the *News-Press* for his leadership. In 1951, he was listed in *Who’s Who on the Pacific Coast: A Biographical Dictionary of Leading Men and Women of the Pacific Coast and the Western States* (A. N. Marquis: 1951). Rev. Cole died in 1965 and was buried, appropriately, at Forest Lawn. Please see the attached California Department of Parks & Recreation (DRP) 523 evaluation of 132 S. Kenwood for further details.

We believe that Cole’s long and active history in Glendale, his service at Forest Lawn and in local government, his relationship with the *News-Press*, and the recognition of his leadership from many local offices and institutions, including your predecessors, establishes him as a person who “significantly contributed” to the history of Glendale. Criterion 2 is therefore met.

Finally, the subject property meets Criterion 5: “The proposed historic resource exemplifies the early heritage of the city.” The report acknowledges that “the two Craftsman homes [are] from Glendale’s early 1906 to 1925 residential period and are intact examples of that history. The two homes individually or together are typically of early Glendale history as a residential community where Craftsman style homes were widespread” (page 24). These sentences provide an excellent illustration of what it means for these houses that are “examples” of and “typically of”

Glendale's early history to *exemplify* that history. The consultant disqualifies this assessment, however, by insisting that they are "not among the best examples of the remaining Craftsman styles in Glendale" (page 24). Criterion 5 imposes no requirement that a property be among the best examples of that heritage. The consultant notes that the 2007 Craftsman survey "identified a group of Craftsman homes that are exemplary resources," but the significance is unclear, and that survey is out of date and should not be considered determinant regardless because so few of this type remain in commercial zones of Glendale, which were not included in the survey. We believe that the subject property meets Criterion 5.

The consultant did not prepared the appropriate DPR 523 forms for the buildings on the subject property. TGHS attaches a DPR 523 evaluation for 132 S. Kenwood, as a sample, which establishes that the former residence of Rev. Clifford Cole is eligible not only for the Glendale Register but for the California Register as well. The form was prepared by Francesca Smith, a Glendale resident and a qualified architectural historian who meets and exceeds the Secretary of the Interior's Professional Qualification Standards in architectural history.

A property needs to meet only one of the five designation criteria to be deemed eligible for listing on the Glendale Register. That threshold has been met. Therefore, a categorical exemption under CEQA is not allowed, and demolition should not take place until an appropriate environmental review is prepared. We note that a CEQA review is also triggered when there is disagreement between experts about whether a property qualifies as a historic resource. As demonstrated in the attached DPR 523 form, a qualified expert has disagreed with the Arroyo Associates assessment that the subject property is ineligible for designation on the Glendale Register. Further CEQA review is therefore required.

Thank you for your consideration.

Sincerely,

Greg Grammer

President
The Glendale Historical Society

cc: Ardy Kassakhian, City Clerk
cc: Scott Ochoa, City Manager
cc: Jay Platt, Senior Urban Designer