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November 21, 2016

Ms. Vilia Zemaitaitis
Director of Community Development
City of Glendale
633 East Broadway
Glendale, CA 91206

RE: DRAFT EIR for 126 – 132 S. Kenwood Street

Dear Ms. Zemaitaitis:

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 draft EIR for the multi-family residence project at 126, 128 & 132 S Kenwood St. Established in 1979, TGHS is a non-profit organization with more than 650 members dedicated to the preservation of Glendale's history and architectural heritage through advocacy and education.

We are pleased that the City changed its position and required the preparation of an EIR for the proposed project. We continue to disagree, however, with the findings of the historic resources consultant that the Craftsman houses at 128 and 132 S. Kenwood are not historic resources under CEQA. We believe that the consultant's assessment is once again fundamentally flawed: Arroyo Resources fails to detail adequately the architectural significance of the properties; to perform adequate comparisons to other properties surveyed and found eligible for the Glendale Register in the "Historic Resources Technical Report" for the 2007 Downtown Specific Plan and the 2007 Craftsman Survey; and to include all readily available facts about the Rev. Clifford Cole and his significance to the city, region, and state. Francesca Smith, an expert who meets and exceeds the Secretary of the Interior's Professional Qualification Standards has found 128 and 132 S. Kenwood to be eligible for the Glendale and California Registers. In the rest of this letter, and in the attached DPR 523 forms, we provide substantial evidence that the properties are historic resources under CEQA. We ask that the EIR be revised to reflect this assessment and that it present serious alternatives to the project as required under CEQA.

The Reverend Clifford Cole

Arroyo Resources' previous evaluation neglected to mention Clifford Cole's decades-long ownership of and residence at 132 S. Kenwood or his contributions to the city, the region, and

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.

the state. The most recent evaluation does much to amend that indefensible gap. It provides many details of Cole's career in Glendale and in California, some of these gleaned from Cole's Biography File located in Special Collections at the Glendale Public Library (the existence of such a file, incidentally, is generally evidence that a person was considered locally significant).

Arroyo Resources does not believe that Cole, who owned the property at 132 S. Kenwood from 1918 – 1963 and resided there for all but a dozen years of that time, is significant to the history of Glendale because, basically, there were lots of religious leaders in the city, and “[d]uring this time, religious leaders were supposed to be upstanding citizens with exemplary interests in their community” (p. 42). Cole's activities and accomplishments within and on behalf of Glendale, the region, and the state substantially exceed this meager reckoning, because the consultant frequently does not know or adequately characterize them.

The consultant observes that the Central Christian Church (Disciples of Christ) grew significantly during his tenure as pastor there, from 1917 to 1938, and that he led the efforts to construct a new church building at 304 E. Colorado Street (no longer extant). She also notes his activity in other community groups, although some are left out or downplayed: for example, he was *one of the first Board Members of the Glendale YMCA*, a *charter member and first vice president* of the Glendale Kiwanis Club, and he was a *thirty-year* member of the Glendale Parks and Recreation Commission (“C. A. Cole, News-Press Writer, Dies,” *Glendale News-Press*, Oct. 13, 1965, 5-A). A *News-Press* article about his retirement from the pastorate of the Central Christian Church noted that as of 1938 he had also five times served as President of the Glendale Ministerial Association, a position of leadership within the city's community of clergy (“Dr. Clifford A. Cole Resigns Pulpit,” *Glendale News-Press*, June 10, 1938, included in Arroyo Resources, “Historic Resources Assessment,” October 18, 2016, Exhibit 9). Other activities included membership on the Board of Trustees at Chapman College in Orange, where the Clifford A. Cole Memorial Scholarship continues to fund students training for the ministry.

These activities (with the exception of the duration of his role on the Parks and Recreation Commission) likely fall within the normal range of religious leadership; others do not. For twenty-three years Cole presided over the Forest Lawn Easter Service as President of the Glendale Community Sunrise Easter Service, for which he received a citation from the Glendale City Council, the Parks & Recreation Commission, Forest Lawn Memorial Park, and the *Glendale News-Press* in 1946 (Clifford Cole, *Glendale Community Book*, 1957, included in Arroyo Resources, “Historic Resources Assessment,” Oct. 18, 2016, Exhibit 9). This information is nowhere mentioned in the consultant's evaluation, despite copious annual coverage of the Service in the *Los Angeles Times* and the *Glendale News Press*, Forest Lawn's self-evident importance to Glendale, and reference to his leadership in the *Community Book*. Begun in 1924, the Forest Lawn Easter Service was a signature regional religious and civic event; as its popularity grew it was attended by tens of thousands of people and involved a processional, multiple sermons and addresses, musical performances by the Los Angeles Philharmonic and other concert groups, and, famously, flights of doves from the Tower of Legends. Cole's association with the event is first mentioned in 1926, when he delivered the benediction (“Glendale Announces Program for Easter Celebration,” *LA Times*, March 22, 1926, A8), and for nearly two decades (1929 – 1948) his name appears in annual newspaper coverage. He delivered either the invocation or the benediction and was specifically identified on multiple occasions as the event's Program Chair. Other clergymen played a role at the services, but these

individuals changed each year; only Cole was a mainstay for more than twenty years, helping to shape this important annual event in the life of the community.



Figure 1. Easter Service, Forest Lawn, 1937 (Los Angeles Public Library Collection)

The consultant also seems to find nothing remarkable in the fact that despite his very active role in the church and the community, for more than twenty years Cole found time to write a *daily* column on the editorial page of the *Glendale News Press*. Cole's "Our Preacher Says" appeared in 1938; eventually the name was changed to "The Daily Pulpit," and it ran under this title until 1965, the year of his death (although by the 1960s the editorial page and the column appeared multiple days a week rather than daily). It was syndicated in other Copley papers as well ("C.A. Cole, News-Press Writer, Dies"); the fifteen newspapers owned by Copley Press were concentrated mainly in southern California and Illinois, so Cole's syndicated column ran throughout the region as well as elsewhere in the country.

The consultant dismisses Cole's efforts by saying that his contribution was "not outstanding compared to other writers or leaders at the Glendale News Press," while offering no evidence on which to base this conclusion or on what grounds such a determination might be made. What is remarkable about Cole's local contribution is precisely that he was not a professional journalist, and that he was viewed as a sufficiently important member of the community to become for almost thirty years the *Glendale News-Press*' spokesman for religion and a moral life outside his

own Church, beyond even a community of church-goers, to the Glendale population at large. Moreover, while religious leaders “were supposed to be upstanding citizens with exemplary interests in their community,” according to Arroyo Resources, a column of this frequency and duration was hardly business-as-usual for the clergy. Cole was Glendale journalism’s official spokesman as a local religious leader; the column, in other words, distinguished him from other clergy in the city.

The consultant notes that Cole resigned as pastor of the Central Christian Church in 1938, after which he became the State Secretary of Christian Churches in 1939, a position he held until 1956, when he retired to become head of “a statewide assembly of churches called Mid-Century Church Extension.” The consultant has little to say about this Church Extension program or its significance in Cole’s religious activities, beyond that he held the directorship for a year and its program, which he designed, was “regarded as a considerable model by those in his field for its claim that churches were capable of self-support.” This analysis ignores the concrete, material effects of this program throughout the region and state, which he began working on by 1948 in his capacity as State Secretary. Cole presciently recognized the enormous implications of the regional population boom through migration and childbirth and that churches must keep pace (“Monetary Crusade by Church Urged,” *LA Times*, Oct. 1, 1948, 14). The program was officially initiated in 1951; it was notable because Christian Churches fundraised to buy new sites and erect initial buildings within rapidly growing communities in California *before a congregation for the church yet existed*. The State Secretary’s job was to recruit and appoint the first pastor and conduct business and administration for the congregation until it became viable. Thirteen churches were built throughout suburban areas of southern California as a direct result of Cole’s “Build it and they will come” Church Extension program, including in Arcadia, Monterey Park, Rivera, Woodland Hills, Garden Grove, Fontana, West Covina, Puente, and Fullerton (Edwin C. Linberg, *The Disciples in the Pacific Southwest Region*, 2009; “50 Preachers Aid in Raising New Sanctuary,” *Los Angeles Times*, Nov. 22, 1952, A3; “Former School to Be Dedicated as Church,” *Los Angeles Times*, May 15, 1954, A3; “Christ Disciples to Open Church,” *Los Angeles Times*, Nov. 6, 1954, A3). Nearly two decades after Cole’s death, a residence hall at Loch Leven Christian Camp and Conference Center in the San Bernardino Mountains was named in his honor (1978) and still bears his name (Loch Leaven “History” and “Lodging” <http://www.lochleven.org/history.html>). An article announcing Cole’s retirement as State Secretary mentioned that in his more than twenty years as State Secretary a total of twenty-eight new churches had been built in southern California (“Disciples of Christ State Secretary Retires,” *LA Times*, March 3, 1956, A3, included in Arroyo Resources, “Historic Resource Assessment, Oct. 18, 2016, Exhibit 9). This is a remarkable record of accomplishment—especially given that construction virtually ground to a halt during World War II—that far exceeds the expectations of the local church leader as “upstanding citizen.”

The consultant’s application of National Register guidance to gauge the significance of Clifford Cole as owner and resident of 132 S. Kenwood is misguided. Glendale Register criteria take precedence: there is no requirement that a person’s significant work had to have been performed at the property for it to be considered for local designation, and for good reason; if that were the case, virtually no residences associated with important men and women of business, politics, public affairs, sports, or entertainment—i.e. the kind of figures who usually contribute significantly to the city, region, state, or nation—would be eligible for listing. For example, the residence of Casey Stengel (1663 Grandview Avenue, GR #109) would not have been found eligible for the Glendale Register under its associative criterion; only a handful of baseball

stadiums would qualify for that honor. Arroyo Resources further states that “it is arguable that most of this work is to be associated with [Cole’s] public place of work, the Central Christian Church, not his private home.” Cole resigned as pastor there in 1938; he had a productive career in religious and literary matters for more than two decades, work that surely went on some place else. Beyond that, the consultant notes that the Central Christian Church has been demolished, as though that were an end to the matter. The demolition of that building is further reason to recognize the association of Cole with his residence at 132 S. Kenwood rather than the contrary.

Arroyo Resources’ evaluation is remiss in not acknowledging Cole’s leadership in the Forest Lawn Easter Service, in not providing a proper reckoning of his significance as a daily columnist in Glendale’s paper of record, and in not including details of Cole’s role in the Mid-Century Church Extension program and its influence on the southern California region and the state. A property is eligible for the Glendale Register under Criterion 2 when it is “associated with a person, persons, or groups who significantly contributed to the history of the nation, *state*, *region*, or *city*” (emphasis added). Arroyo Resources did not even consider Cole’s role in regional history. His outstanding participation in Glendale’s civic and religious community; his prominence as pastor, Commissioner, and journalist, as well as his connection with Forest Lawn, among other vital roles; and his leadership in the state organization of the Disciples of Christ and as the driving force behind the construction of new churches throughout the burgeoning southern California region in the 1940s and 1950s, qualify as a significant contribution to the city, region, and state. 132 S. Kenwood is eligible for the Glendale Register under Criterion 2: “Associated with the lives of persons important to local, California or national history.”

Architectural Significance

128 S. Kenwood was found eligible for the Glendale Register in a city-adopted historic resources survey conducted in 2006 by Jones & Stokes for the Downtown Specific Plan. In finding the property not eligible for the Glendale Register, Arroyo Resources does not adequately consider the context of that “Historical Resources Technical Report” and reverts instead exclusively to the Craftsman Survey of 2006-2007, which did not include areas zoned for multi-family use, of which the S. Kenwood property is part.

This distinction matters: the 2006 Technical Report surveyed every property in the Downtown Specific Plan area. It found only three single-family houses from the post-World War I period to be eligible in downtown. 128 S. Kenwood was found eligible under Criterion 3, as “one [of] the last intact single-family residential structures remaining from downtown Glendale’s development following the First World War, and contains exemplary elements of design, detail, materials and craftsmanship from this period.” We note that 128 S. Kenwood is also the only post-World War I Craftsman residence found eligible; the other two postwar houses, at 112 N. Columbus and 216 S. Kenwood, are both Spanish Colonial Revival style, the architectural style in Glendale to which the Craftsman most notably gave way. Only six other Craftsman houses, built between 1905–1915, were found to be eligible in the entire downtown area covered by the Technical Report, a part of Glendale once blanketed with houses of that style. 128 S. Kenwood’s significance must be understood in relation to the area in which it was surveyed and its zoning (multi-use), which does much to explain the scarcity of the style within it. It was found eligible more than a decade ago and since that time, it is not known precisely how many Craftsman style houses have been demolished, but fewer remain than existed at that time, which makes it more exceptional than in 2006.

In finding 128 and 132 S. Kenwood not eligible for designation on the Glendale Register, Arroyo Resources misapplies California Register Criterion 3: “Embodies the distinctive characteristics of a type, period, region or method of construction or represents the work of a master or possesses high artistic values.” Her analysis states, in the sort of flat, overly generic language common to suggest that architecturally interesting properties are not historic resources: “Both homes are representative of the Craftsman period in Glendale, both exhibit key character-defining features of the Craftsman style, notably the front porch, wood horizontal siding, and wide roof overhangs. The two homes have features that are common and found to be non-distinctive.” The consultant neglects both obvious and subtle differences between these Craftsman examples to avoid describing how each articulates different features of the Craftsman style. Beyond that, the claim that the houses have features in common and thus do not embody the “distinctive characteristics of a type, period, region or method of construction” is senseless. “Distinctive” in this criterion means distinctive *to* the Craftsman style, not distinctive *from* it.

Arroyo Resources compared the subject property to “a representative sample of eight of the 444 properties found ineligible for listing” in the Craftsman Survey. These were high-integrity Craftsman Bungalows “built within a period close to the subject property.” She also compares 128 S. Kenwood to eight of the fifty-four Craftsman properties found eligible for the Glendale Register. Strangely, though, the sample here is drawn entirely from properties that were built before 128 S. Kenwood: the comparisons were built in 1909, 1911 (2) 1912, 1913 (2), 1914, 1916. There were no comparisons to Craftsman Colonial properties, which are more appropriate in terms of 128 S. Kenwood’s style and date of construction (1920s). The comparison properties are from a period when the Craftsman style was in ascendance rather than when it was on the wane and influenced by Colonial Revival features in Glendale.

The house at 128 S. Kenwood is Colonial Craftsman in style. Colonial style features include the overall horizontal orientation, roughly symmetrical façade, its side-gabled roof, and partial width front porch with a notable segmental arch and sheltered front gable, supported on simple wood-on-brick posts. The entrance porch is enclosed by a low painted brick wall with matching pedestals and concrete caps; the short, tapered, painted wood posts, which support the porch, are more usually associated with the Bungalow style. Exterior walls are finished in painted shiplap siding and all windows and doors have wide, painted wood casings. A large, subtly curved and distinctive header supports the porch which is tied into the posts with classical moldings. Its roof has exaggerated, block-like purlines, and decorative, front-facing, alternating stick work punctuates the attic vent at the apex of the gable. The painted wood entry door has a recessed, single panel which, with its hardware, appears to be original. Only four Colonial Craftsman style houses were found eligible for the Glendale Register in the Craftsman Survey. 128 S. Kenwood compares favorably, as described in the DPR. The subject property is the rarer for having an intact garage in a different Colonial Craftsman sub-type—the Clipped Colonial—which exhibits horizontal wood siding, exposed rafter tails, and wide wood door and window casings.

At the rear, the house notably features exceptionally rare hay loft doors (Figure 2). This feature is not known to exist elsewhere in Glendale and is mentioned nowhere in the consultant’s assessment. Hay lofts are more typically featured on barns, but even the one extant barn in Glendale, the Le Mesnager barn (built 1911, Glendale Register #11), does not possess this feature. The only known hay loft doors in the area are in Pasadena (Raymond Flower District

stable) and the Walt Disney Barn at Griffith Park (c. 1950, relocated 1999). Neither was historically ever used as a residence, and neither of those structures is located in Glendale.



Figure 2. View east of the rear of the house at 128 S. Kenwood, showing hay loft, five-panel doors at the apex of the main gable. The hay loft doors are flanked by decorative attic vents on either side.

Our letter and the attached DPR bear out the preliminary determination of the 2006 Historic Resources Technical Report that 128 S. Kenwood is eligible for the Glendale Register under Criterion 3, because “[t]he proposed historic resource embodies the distinctive and exemplary characteristics of an architectural style, architectural type, period, or method of construction” and Criterion 5, because “The proposed historic resource exemplifies the early heritage of the city,” when the Craftsman style, now endangered throughout the City, was ubiquitous even downtown. It is also discretionarily eligible for the California Register under Criterion 3.

The attached DPR for 132 S. Kenwood indicates that it is eligible for the Glendale Register not only under Criterion 2, for its association with the Rev. Clifford Cole, but also under Criterion 3, as a robust example of an intact middle-class Craftsman Bungalow residence. It is not a high-style example, but its low sloping roof, generous eave overhangs, decorative exposed rafter tails and beams, partial-width porch supported on a tapered squared post and low, capped brick walls, and somewhat unusual alternating wide and narrow shiplap siding that is flared at the corners are each character-defining features of the style that was especially popular in Glendale between 1905 and 1925. The property also meets Criterion 5; the design of the house and garage embodies distinctive characteristics of the Craftsman type and exemplifies the early twentieth century period for the same reasons as its neighbor. It is also discretionarily eligible for the California Register under Criterion 2 and 3.

Project Alternatives

As the draft EIR is currently prepared, the Project Alternatives section is superfluous, because the consultant does not find the subject properties to be historic resources under CEQA, and thus no action to avoid or mitigate significant impacts caused by the proposed project is required.

We have argued in detail why that finding is flawed and why 128 and 132 S. Kenwood should be considered locally significant and thus historic resources under CEQA. We request that the EIR be revised or supplemented reflecting their demonstrated historic significance and that a Project

Alternatives section be added that actually meets CEQA requirements and provides clear project objectives and an analysis of alternatives to the proposed project. CEQA Guidelines Section 15126.6 require a description of “a range of reasonable alternatives to the project, or to the location of a project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives.”

The project objectives as currently described in the draft EIR are vague and ambiguous. Economic feasibility arguments are made without any evidence to support them; the same is true for the finding that “successful relocation of these existing wood frame residential buildings would likely not be feasible.” A project alternative to allow new development on the site inexplicably only considers the construction of a twelve-unit apartment building on the vacant lot at 126 S. Kenwood. A serious on-site development alternative would take into account additional, reasonable possibilities for development.

Consultant Qualifications

We note that the historic resources consultant should append her professional qualifications as part of the EIR. We herewith submit those of our qualified, volunteer Architectural Historian Francesca Smith (attached).

Conclusion

This letter and the attached forms indicate that the historic resources consultant’s assessment is again fundamentally flawed. TGHS believes that we have provided substantial evidence that the 128 and 132 S. Kenwood properties are historic resources under CEQA and that the proposed project would cause a significant impact on the environment if those buildings were to be demolished. In this letter and the DPR 523 forms filed with the state of California, TGHS has presented facts, reasonable assumptions predicated on those facts, and expert opinion supported by facts to prove that both properties should be considered eligible for listing on the Glendale Register and are eligible discretionarily for the California Register. We respectfully request that the EIR be amended to reflect that status and that project goals be presented clearly and fully and serious project alternatives considered as required under CEQA.

Thank you for your consideration.

Sincerely,

Greg Grammer

President
The Glendale Historical Society

cc: Mr. Phil Lanzafame, Director of Community Development
Mr. Jay Platt, Senior Urban Designer

Francesca Smith is a professionally qualified Architectural Historian with more than three decades of experience in the field. She holds degrees from the College of Charleston (B.A., Political Science with a minor focus in Architectural History) and Columbia University (M.S. in Real Estate Development, completed requirements for M.S. in Historic Preservation, Planning emphasis). Throughout her career, she has earned a successful professional reputation working with State Historic Preservation Officers throughout the United States including California, Colorado, Illinois, Nevada, New York, Ohio, Texas and Utah. Her thousands of National Register findings have received concurrence in nearly each case; an exception was the eligibility of a single railroad bridge in Texas. Evaluated resources have ranged from commercial, public, and residential buildings to bridges, power plants, early freeways, railroad lines and public housing projects. Her professional judgment has earned her unchallenged determinations of eligibility for numerous federal and state agencies and numerous project awards.

Her diverse resume includes numerous successful National and California Register listings, local landmark designations, certified rehabilitations, relocations, reconstructions and challenges to environmental impact reports (EIRs), Environmental Impact Statements (EISes) and cultural resources technical reports. She was privileged to have served as staff or consultant to the cities of Beverly Hills, Carmel, Los Angeles, Monterey, Orange, Pasadena, San Francisco and Vallejo. Mrs. Smith has acted as Master Reviewer for Los Angeles Unified School District and is Professionally Qualified Staff, Principal Architectural Historian for the State of California, acting for the Federal Highway Administration and Advisory Council on Historic Preservation. She has served as an instructor in historic preservation, design, history and construction management courses at UCLA and USC.