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December 11, 2016

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

Dear Mayor Devine 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 Street.

Established in 1979, TGHS is a non-profit organization with almost 700 members dedicated to the preservation of Glendale's history and architectural heritage through advocacy and education.

We are pleased that city staff required the preparation of an EIR for this project after TGHS argued that the first historic resources assessment, likewise prepared by Arroyo Resources, failed to meet state-mandated minimum requirements for a survey. We identified numerous omissions and errors in our letter, while presenting substantial evidence that the subject property is eligible for the Glendale and California Registers and thus further review under CEQA was required.

TGHS commented in detail on the EIR during the public review period. While Arroyo Resources corrected some of the errors in its initial assessment, the research and conclusions remain flawed. We requested that staff amend the EIR to reflect that the subject property is a historic resource and that genuine alternatives to demolition should be considered under CEQA. The Staff Report disregards our concerns when it inaccurately states that "no new additional information" was provided by TGHS, and so we bring our case to you. We respectfully request that you find that the subject property is a historic resource under CEQA, that you not certify the EIR, and that you require the consideration of genuine alternatives to demolition before development can take place.

### **The City Has Already Found 128 S. Kenwood to Be a Historic Resource Under CEQA**

The City Council already found the Craftsman at 128 S. Kenwood to be a historic resource for purposes of CEQA review when it adopted the "Historic Resources Technical Report" as part of the EIR for the Downtown Specific Plan in 2006. At that time 128 S. Kenwood was found eligible for the Glendale Register; it is one of only three single-family houses, and the only one in the

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.

Craftsman-style, built after World War I to be so designated. The house has not been materially altered since the “Technical Report”; it remains an outstanding high-integrity example of its kind. Character-defining features are laid out in detail in the attached DPR 523 form, which has been submitted to the State of California.

The “Technical Report” is based on a Reconnaissance-level Survey, which does not provide a high level of detail or analysis, and no permits or former owners/residents are researched. Because it is usually conducted from the street, where the property may be obscured, an intensive evaluation is required to make the full determination of eligibility based on appropriate criteria. The Arroyo Resources evaluation reveals nothing that would disqualify the property from the City’s previous finding of eligibility for the Glendale Register—i.e. there are no disfiguring alterations at the sides or rear, no damage to or removal of the “exemplary elements of design, detail, materials and craftsmanship,” for which it was heralded in the EIR for the Downtown Specific Plan that City Council adopted. These are the sorts of discoveries that can render a property that appears eligible in a Reconnaissance-level Survey to be ineligible when examined more closely and in its totality.

Not only is there nothing to disqualify it from eligibility, but Arroyo Resources takes no note of an extraordinarily rare design feature at the rear of the house, even though it is visible from the public right of way and evident in the photo submitted as part of the Cultural Resources Assessment (figure 4.1-5). The rear of the house features a pair of hay loft doors. Hay lofts are attic-like spaces where hay is stored, generally in the rafter areas of barns to keep it dry. We will never know why such an unusual rural feature was included in this residence. As the Staff Report notes, the hay loft doors are not character-defining features of the Craftsman-style; that is true but unimportant. They are so rare as to be known to exist nowhere else in Glendale, and that rarity contributes to the property’s local significance rather than diminishing it.



Figure 1. 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.

If this strikingly rare feature at 128 S. Kenwood only makes its architectural significance more difficult to ignore, so too does the intact Clipped Colonial Craftsman garage, another rare feature of the property that similarly garners no mention in the consultant's assessment. Unfortunately, the consultant offers rhetoric in place of evidence; the assessment traffics in the flat, blandly declarative language commonly used to suggest that architecturally significant properties are not historic resources (see for example 4.1 "Cultural Resources," p. 16). Because that language cannot accommodate the subtlety of architectural detail, that detail is omitted: the large, subtly curved (also unusual) and distinctive header that supports the partial-width front porch and is tied into the slender, tapered, painted wood posts with classical moldings; the roof's exaggerated, block-like purlins, and decorative, front-facing, alternating stick work that punctuate the attic vent at the apex of the gable; and, at the rear, the five-paneled hay loft doors, which are flanked by decorative attic vents on either side.

The consultant is in error when she ignores the context of the "Technical Report"—i.e. this is the only post-World War I Craftsman, and one of only seven Craftsman houses overall, to have been found eligible for the Glendale Register in the Downtown Specific Plan area. The consultant compares 128 S. Kenwood to eight of the 444 properties found ineligible for listing in the out-of-date Craftsman Survey of 2007, which did not include the subject property. The consultant claims that "the sample shows that Craftsman homes with high integrity but exhibiting only the basic and the requisite number of character defining features were not found to be eligible for listing" ("Historic Resources Assessment," p. 44). None of the examples, seven of which date from 1919–1922, include the delicately arched header, which is uncommon for a porch of this size, and of course none is known to possess a feature so unique as the hay loft doors. 468 Hawthorne St. is closest in style to the subject property, but it lacks the careful execution of scale and proportion exhibited in it. The consultant finds the subject property wanting when compared to Craftsman houses that were found eligible for the Glendale Register; inexplicably, none of these dates from the post-World War I period, when the subject property was built, and when the Craftsman style was on the wane; the comparisons are from when the style was in its ascendance (1909, 1911 [2] 1912, 1913 [2], 1914, 1916).

In short, there is no reason whatever for the City—and City Council—to reverse itself and suddenly decide that this high-integrity Craftsman at 128 S. Kenwood, which continues to embody the same "distinctive and exemplary characteristics of an architectural style, architectural type, period, [and] method of construction" that it did a decade ago, is not a historic resource. A properly prepared historic resources assessment would have found the opposite: that the subject property is rarer than first supposed due to the hay loft doors and intact Clipped-Colonial garage, neither of which were observed in the 2006 Reconnaissance Survey. It was found eligible for the Glendale Register; those findings were adopted by City Council; and it remains eligible today. The burden is on the City as lead agency to demonstrate that the findings of the Survey for the Downtown Specific Plan were incorrect, and it has failed to do so. Identified historic resources do not become less historic as time goes by, and comparable examples are altered or demolished; they become rarer. Particularly is this true of the Craftsman in Glendale, where it has become a rapidly disappearing resource type. From the adoption of the Craftsman Survey in 2007 until 2015, by the City's own count, more than twenty Craftsman houses have been demolished. *Just this year, more than twenty-five additional Craftsman houses* have been demolished or are proposed for demolition, the majority in South Glendale. Even the status of buildings that, unlike 128 S. Kenwood, have not been found to be historic resources in a city-adopted Survey, may change as those building types become increasingly rare. Under CEQA the City is required to take into

account cumulatively considerable impacts on historic resources, which to our knowledge it has not done, as this information is not included in the EIR.

### **The Reverend Clifford Cole**

The City Council does not need a long lecture on the importance of the Reverend Clifford Cole, and why his decades-long residency at 132 S. Kenwood qualifies it for the Glendale Register. But it is worth pointing out another fatal flaw of Arroyo Resources initial assessment: its failure to provide information about previous owners/residents of the subject property before making a determination of eligibility, even though such information is required (the basic details about Cole's connection to the property and his importance to Glendale were available through a simple internet search).

Briefly, in the second assessment the consultant finds that Cole was an important religious leader in Glendale, but there were lots of religious leaders in the city, and they all were "upstanding citizens with exemplary interests in their community" (Historic Resources Assessment, p. 41). The consultant mentions some of his accomplishments, most of which we raised in our letter to Council on March 28, but inexplicably omits or downplays others. For over twenty years, Cole presided over the Forest Lawn Sunrise Easter Service as Program Chair and President of the Glendale Community Sunrise Easter Service, for which he received a citation from City Council as well as Forest Lawn Memorial Park and the *Glendale News Press* in 1946. This is nowhere mentioned in the consultant's assessment, despite copious annual coverage of the Service in the *Los Angeles*



Figure 2. Easter Service, Forest Lawn, 1937 (Los Angeles Public Library Collection)

*Times* and the *Glendale News Press*, Forest Lawn's importance to Glendale, and our inclusion of this information in our letter of March 28, a fact pointed out in our comments on the draft EIR. 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. The consultant also neglects to mention that by 1938 he had served five times as President of the Glendale Ministerial Association, a position that testifies to his leadership within the religious community as recognized and endorsed by his peers in the clergy. The consultant also finds nothing remarkable in the fact that despite his very active role in the church and the community, for almost three decades Cole wrote a syndicated column in the *News Press* and other Copley Press newspapers; it was a *daily* column for more than twenty years. No other religious leader, in or out of Glendale, had any comparable role at the *News Press*, which viewed him as a sufficiently important member of the community to be its official spokesman for religion and a moral life outside his own Church, beyond even a community of church-goers, to the population at large. None of this was business as usual for a religious leader.

Additional information about his significance to Glendale is included in our official comments on the draft EIR, which were submitted on November 21. That document also includes evidence of Cole's importance to the region and the state as State Secretary of Christian Churches, beginning in 1939, and later head of its Mid-Century Church Extension program, which he pioneered to meet the religious needs of California's population boom through migration and childbirth by building churches before there was a full congregation in place. In these capacities he was responsible for the construction of twenty-eight new churches in southern California—again, information nowhere mentioned in the Arroyo Resources assessment (although it is in her reference materials) and yet also strangely not considered “new information” in the Staff Report (“Disciples of Christ State Secretary Retires,” *LA Times*, March 3, 1956, A3). This is a remarkable record of achievement, especially considering that construction virtually ground to a halt during World War II.

The Staff Report's comment that none of the recorded accounts of [Cole's] activities, both civic and religious, “specifically described his role as significant or indicated if and how his role contributed to the growth and development of the community” is beside the point. Copious newspaper coverage of the Forest Lawn Easter Service, in which Cole played the lead role, and articles on his career, from pastor at Glendale's Christian Church, to State Secretary of the Disciples of Christ Churches, to head of the Mid-Century Extension Program, are evidence of his significance, whether the articles employ that word or not. And it is not clear why someone so intimately involved with the city's and the region's religious life would also be expected to have contributed to Glendale's “growth and development.” That language is not present in the Glendale Register criteria and is too narrow a measure of how significance within a community is achieved.

The Staff Report states that the Arroyo Resources Report found that the activities of the Christian Church and Cole's role in it in the years between the wars “were not different from the activities of the 15-21 other active churches in Glendale.” The consultant presents this as fact but provides no evidence to support it; we have offered ample evidence that it is inaccurate as well as a detailed account of his significant activities beyond his church and beyond the interwar years. A property is eligible under Criterion 2 of the Glendale Register if “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.” An additional failure of the Arroyo Resources' assessment, which we identified in

our comments on the draft EIR, is that it does not evaluate the significance of Rev. Cole to the history of the region. Even without that additional lapse, it is remiss overall in not acknowledging Cole's leadership in the Forest Lawn Easter Service and in not providing a proper reckoning of his significance as a columnist in the *Glendale News Press*, both of which contribute to his significance to the City and render the property eligible for the Glendale Register.

### **The EIR Does Not Consider Serious Alternatives to Demolition**

The Staff Report appears to take issue with our claim that project alternatives "are not defined enough," because the EIR is not required to provide detailed alternatives when there are no significant environmental impacts to be reduced. That is precisely our point. The Project Alternatives section is superfluous given the consultant's flawed finding that the subject property is not a historic resource. We want to make sure the City Council understands that the Project Alternatives section of the document is not a serious consideration of alternatives and would not meet the requirements of CEQA were review of alternatives required. 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." The one concrete alternative weighed inexplicably considers only the construction of a twelve-unit, one-bedroom apartment building on the vacant lot at 126 S. Kenwood. A legitimate on-site development alternative that met CEQA requirements would take into account additional, reasonable possibilities for development.

### **Conclusion**

The City has not proven its case that the subject property is not a historic resource under CEQA, and staff have given Council no reason to alter its previous decision that 128 S. Kenwood is eligible for the Glendale Register. The Staff Report ignores the many additional details TGHS provided about Reverend Clifford Cole that were missing from the Arroyo Resources' assessment, even on the second try, which we believe establish its eligibility for the Glendale Register under Criterion 2; the attached DPR includes additional details on its eligibility under Criteria 3 and 5.

We request that you not certify the EIR and require that serious project alternatives to demolition are considered by the applicant and City staff before further development of the site is approved.

Thank you for your consideration and service.

Sincerely,

*Greg Grammer*

President  
The Glendale Historical Society

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