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Submitted electronically

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October 21, 2013

**RE: St. Martha's Episcopal Church, 520 S. Lark Ellen Avenue,
West Covina—Lark Ellen Residential Project MND**

Dear Mr. Garcia:

On behalf of the Los Angeles Conservancy, we submit these comments on the historical significance of the former St. Martha's Episcopal Church at 520 S. Lark Ellen Avenue and the need for a full environmental impact report (EIR) prior to the approval of any project that would adversely impact the building. While the Conservancy was not aware of the review comment period and deadline of October 10th, the issue has recently come to our attention and we consider this to be a significant historical resource. The proposed project will demolish this structure and thus result in significant impacts, whereby the California Environmental Quality Act (CEQA) calls for the need to identify and consider preservation alternatives. The Mitigated Negative Declaration's (MND) conclusion that the project will have "no impact" on historical resources is based on a deeply flawed Cultural Resource Report lacking thorough research and contextual analysis and containing unsupported conclusions.

I. Significance of St. Martha's Episcopal Church and Carleton M. Winslow, Jr.

St. Martha's Episcopal Church is a significant example of postwar modern church design in the city of West Covina. The MND dismisses the architectural significance of the church, yet fails to mention that St. Martha's has been profiled in both national and local publications which both attest to the quality of its design and place it in the national context of modern church design.

Architectural Record, one of the nation's leading architecture journals, selected St. Martha's Church as a noteworthy example of ecclesiastical modernism to be profiled in its building types study of religious buildings in December 1956. The following year, St. Martha's was one of 35 outstanding churches and synagogues from throughout the world profiled in the 1957 publication *Religious Buildings for Today*, published through the auspices of the American Institute of Architects. Additionally, St. Martha's has been consistently profiled in all five editions (ranging



from 1965 to 2003) of *An Architectural Guidebook to Los Angeles* by David Gebhard and Robert Winter; it is the only structure in West Covina highlighted in these popular architecture guides.

St. Martha's Episcopal Church, designed by local architect Carleton Winslow, Jr. and completed in 1958, is significant as an example of postwar modern church design in the city of West Covina that reflects a national context of modern design utilized for houses of worship. As a building type, houses of worship underwent significant transformation during the postwar era with both religious organizations and architects embracing new forms and building materials to express ancient concepts. Postwar growth, particularly in suburban communities such as West Covina and the greater San Gabriel and Pomona Valleys, fueled a substantial increase in the construction of modern houses of worship.

St. Martha's rectangular-plan structure is characterized by its simple design and flat roof, but utilizes key elements associated with the modern movement. The nave's simplicity is accentuated by the building's structural post and beam construction of laminated wood beams, which is expressed on both the interior and exterior. Extensive glazing allows for dramatic illumination of the sanctuary, while the roof plane extends to form deep eaves as a form of integrated solar shading. Lighting and ventilation are also carefully planned as part of the church's modern design. Pendant lights with cylindrical lamps accentuate the measured rhythm of both the structural posts and glazing system. Jalousie windows are employed in specific sections of the grid-like window system, some spanning floor to ceiling, for maximum ventilation beyond that which was typically provided in traditional church design.

A further distinction of St. Martha's Church is the Asian influence of its design. The entirely exposed post and beam configuration at the church's entrance, modified with a second pair of inner posts, is suggestive of a *torii*, a traditional Japanese gate used to mark the entrance to a sacred space. Such incorporation of stylized Asian influences in modern architectural designs became more frequent throughout the decade of the 1960s, and is a novel design element of St. Martha's that retains a symbolic link to its historical function.

A less apparent, yet significant aspect of modern architecture embodied in the design of St. Martha's is its simplified design, which translated to a reported price tag of \$70,000.ⁱ The often simplified designs of modernism that eschewed extraneous decorative detailing were particularly attractive to parishes with limited budgets, whereas traditional designs with decorative detailing could be cost prohibitive.

Carleton Winslow, Jr., while not as well known as his architect father, was a skilled local architect who specialized in ecclesiastical design. Some of his designs throughout Los Angeles County include St. Mark's Episcopal Church (1955) at 14646 Sherman Way in Los Angeles, Crenshaw Christian Church (1957) at 9550 Crenshaw Boulevard in Inglewood, and Pacific Unitarian Church (1965) at 5621 Montemalaga Drive in Rancho Palos Verdes. Winslow was a proponent of modern design for houses of worship; some of his designs included such innovative features as a revolving altar at St. Mark's in Los Angeles. Architecturally, Winslow's modern churches are emblematic of the modernism embraced in greater postwar Los Angeles; his Pacific Unitarian Church is profiled in the photographic monograph *Modernism Rediscovered*, which celebrates the postwar built environment through the photography of Julius Shulman.



II. The MND’s conclusion that the project will have “no impact” on historical resources is not supported by substantial evidence

Despite the MND’s summarizing statement that St. Martha’s Episcopal Church complex is recommended ineligible, both individually and as contributors to a historic district based upon “careful consideration of their ability to the historic contexts with which they are associated,” the evaluation fails to reference any of the architectural publications in which St. Martha’s has been profiled, indicating an absence of research.ⁱⁱ

Additionally, unsupported blanket statements in the “Evaluation of Significance” section of the MND make findings of ineligibility, yet are not substantiated with evaluation that properly applies California Register criteria. The MND states “while the St. Martha’s Episcopal Church can be classified as an example of Modern architecture from the late 1950s in West Covina and Los Angeles County, it does not sufficiently embody distinctive characteristics of that architectural style, or as a particular type, period, or method of construction, that distinguish it architecturally in comparison to similar churches.”ⁱⁱⁱ The evaluation indicates that this finding was based on an informal reconnaissance survey of 15 other modern churches in West Covina, and the MND subjectively concludes that “several were noted to be better examples of the Modern style, period, and method of construction” without providing further details.^{iv} In applying Criterion C/3 of the National and California Registers, the evaluation of St. Martha’s architectural significance should not be based on an informal, comparative survey of other modern churches in West Covina, but rather, on research and analysis that examines the subject property in the historical context of postwar modern church design.

In another similar instance, the evaluation of architect Carleton Winslow, Jr. in the MND is briefly stated as “a member of the AIA who specialized in churches, but was not a prolific architect and taught and wrote about architectural history. Winslow’s career is not so distinguished as to consider him a master architect.” No in-depth research has been provided to indicate the scope of Winslow’s career, his extant body of work, his writing and theories on ecclesiastical design, or the innovations or influence associated with his career.

III. Conclusion

A key policy under CEQA is the lead agency’s duty to “take all action necessary to provide the people of this state with...historic environmental qualities...and preserve for future generations...examples of major periods of California history.”^v Indeed, CEQA review has proven to be one of the most effective tools that we have to stanch the erosion of our cultural heritage. It can prevent irreversible losses through careful consideration of alternatives that achieve most of the project objectives while avoiding significant impacts on the environment. With regard to St. Martha’s Church, there is ample opportunity for development on the site while retaining and adaptively reusing the historic church. We urge the city to reject the MND and require the preparation of an EIR for this project, as clearly mandated under CEQA.

About the Los Angeles Conservancy:

The Los Angeles Conservancy is the largest local historic preservation organization in the United States, with nearly 6,500 members throughout the Los Angeles area. Established in 1978, the Conservancy works to preserve and revitalize the significant architectural and cultural heritage of Los Angeles County through advocacy and education.



Thank you for the opportunity to comment on the Mitigated Negative Declaration for the Lark Ellen Residential Project. Please do not hesitate to contact me at (213) 430-4203 or afine@laconservancy.org should you have any questions or concerns.

Sincerely,



Adrian Scott Fine
Director of Advocacy

ⁱ "Episcopal Churches Push Building Program." *Los Angeles Times*, August 15, 1956.

ⁱⁱ Lark Ellen Project, West Covina MND (September 2013), V-39.

ⁱⁱⁱ Lark Ellen Project, West Covina MND (September 2013), V-38.

^{iv} Lark Ellen Project, West Covina MND (September 2013), V-38.

^v PRC §21001 (b), (c).

