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Submitted electronically

Mayor Herfert and West Covina City Councilmembers
Attention: Ron Garcia, Planning Associate
West Covina City Hall
1444 W. Garey Avenue
West Covina, CA 91790
Email: ron.garcia@westcovina.org

December 17, 2013

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

Dear Mayor Herfert and City Council members:

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. The Conservancy submitted earlier comments on the Lark Ellen Residential Project MND and testified before the West Covina Planning Commission on October 22, 2013, urging the Commission to reject the MND and require the preparation of an EIR as clearly mandated under CEQA.

CEQA establishes a low threshold for the consideration and evaluation of potential historic resources as part of the environmental review process—a clear benefit for communities by ensuring that potential adverse impacts are properly evaluated and mitigated.

We understand that the city's consultant, ASM Affiliates, may have a difference in opinion on the historical significance of St. Martha's Church. However, it is the responsibility of the lead agency to err on the side of caution when substantial evidence supports a "fair argument" that a building qualifies as a historic resource. If substantial and compelling evidence is submitted into the record that a structure may qualify as a historic resource (the fair argument), it does not suffice for the lead agency to opt not to prepare an EIR simply because the retained consultant's findings are contradictory.

With the design of St. Martha's published in architectural journals and highlighted in local architecture guides, in addition to recently submitted letters by the Conservancy, noted architectural historian Alan Hess, and local residents—the "fair argument" has been made and we think it is within the best interest of the city, CEQA, and the project that an EIR be prepared.



I. Significance of St. Martha's Episcopal Church and architect 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 of the time, selected St. Martha's Church as a noteworthy example of ecclesiastical modernism to be profiled in its building types study of religious structures 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. While these publications predate the completion of the building, they reflect the completed design of St. Martha's and the design ideals that shaped its modern ecclesiastical design.

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 1959, 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. 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.

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 \$70,000.¹ 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.

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

The evaluation fails to reference any of the architectural publications in which St. Martha's has been profiled, indicating an absence of research.² The MND then concludes, without substantial evidence, 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."

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."³ 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.⁴ 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.

¹ "Episcopal Churches Push Building Program." *Los Angeles Times*, August 15, 1956.

² Lark Ellen Project, West Covina MND (September 2013), V-39.

³ Lark Ellen Project, West Covina MND (September 2013), V-38.

⁴ Lark Ellen Project, West Covina MND (September 2013), V-38.



a. The response to the Conservancy’s MND comments reassert the original findings, which remain flawed

Much to our disappointment, the response to the Conservancy’s comments are a reaffirmation of the MND’s original findings of no significance for St. Martha’s Church, despite the overwhelming evidence submitted into the record pointing to its historical significance. The response merely reaffirms and elaborates on the methodologies used by ASM Affiliates, but no additional research or contextual analysis was undertaken.

The concluding paragraph of the responses states that St. Martha’s “is not eligible [for listing] under Criterion C for the National Register of Historic Places, Criterion 3 for the California Register of Historical Resources, nor as a West Covina Landmark under criteria C or D.”⁵ The responses ignore potential findings of significance for Criterion A/1 of the National and California Registers, for which substantial information submitting by the Conservancy and others would most likely support; ASM Affiliates, in their responses, once again failed to evaluate St. Martha’s Church in the national context of modern church design as a building type, rather than the narrower focus of architectural significance as applied to Criterion C/3.

ASM Affiliates dismisses the substantial national exposure of the design of St. Martha’s Church that they failed to uncover for the initial analysis in the MND but was submitted into the record by various groups and individuals, stating that the subject articles are “from contemporary publications” and that “ASM’s evaluation of St. Martha’s is rooted in historical perspective. A building must be evaluated considering the historic context of Modernism in West Covina and the extant buildings that are related to that context today.”⁶ Such a response subverts the true significance of this historical information, claiming it has no relevance in the proper methodology of historical analysis. On the contrary, the publication of the design of St. Martha’s Church in both *Architectural Record* and the volume *Religious Buildings for Today*, combined with research on the transformative shifts in ecclesiastical design in the postwar era based on numerous coalescing factors including ideas of worship, modern construction methods and building materials, and the appeal of simplistic modern architecture for cost conscious congregations—all reveal a precise national context of the evolution of modern ecclesiastical design into which St. Martha’s fits, and was put forth as a notable example when such factors shaping that context were of paramount concern.

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.”⁷ 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.

The historical analysis on the historical significance of St. Martha’s Church is flawed, both in the MND and in the response to the Conservancy’s comments. We urge the city to do the right thing, reject the MND and require the preparation of an EIR for this project, as clearly mandated under CEQA.

⁵ Response to Comments, ASM Affiliates, Oct. 22, 2013

⁶ Response to Comments, ASM Affiliates, Oct. 22, 2013

⁷ PRC §21001 (b), (c).



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. Again, the Conservancy urges you, as the lead agency, to reevaluate your approach and application of CEQA in this case, as we feel strongly that an EIR is clearly warranted. 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

Attachment(s)



FOREWORD

The building-committee member who professes little knowledge of architecture and of the architectural implications of his own way of worship is not rare; he is about as frequent a phenomenon as the man who "knows what he likes"; and is, in sad truth, often one and the same.

The churches and temples in this book were designed by architects in cooperation with committeemen and religious leaders who may have known what they liked but were not dogmatic about it. No presumption or prejudice obscured the opportunity to approach — if not always to achieve — the quality of architecture which their faiths and their communities deserved. Buildings in the explicit services of God — like any buildings housing activities of high regard — demand the best talent and the best thinking, the broadest approach and the most intense prosecution.

Although the people who were concerned in these buildings shared the conservatism inherent in all committees and must have dreaded risking what at first might seem bizarre to some, they appear generally to have dreaded even more the kind of dismal design that develops out of fear, and poverty of spirit, and untrammelled sentimentality. While there are in these examples great differences, there are great common denominators as well. None could have been achieved without the encouragement and the enthusiasm of informed and interested committees working with inspired designers.

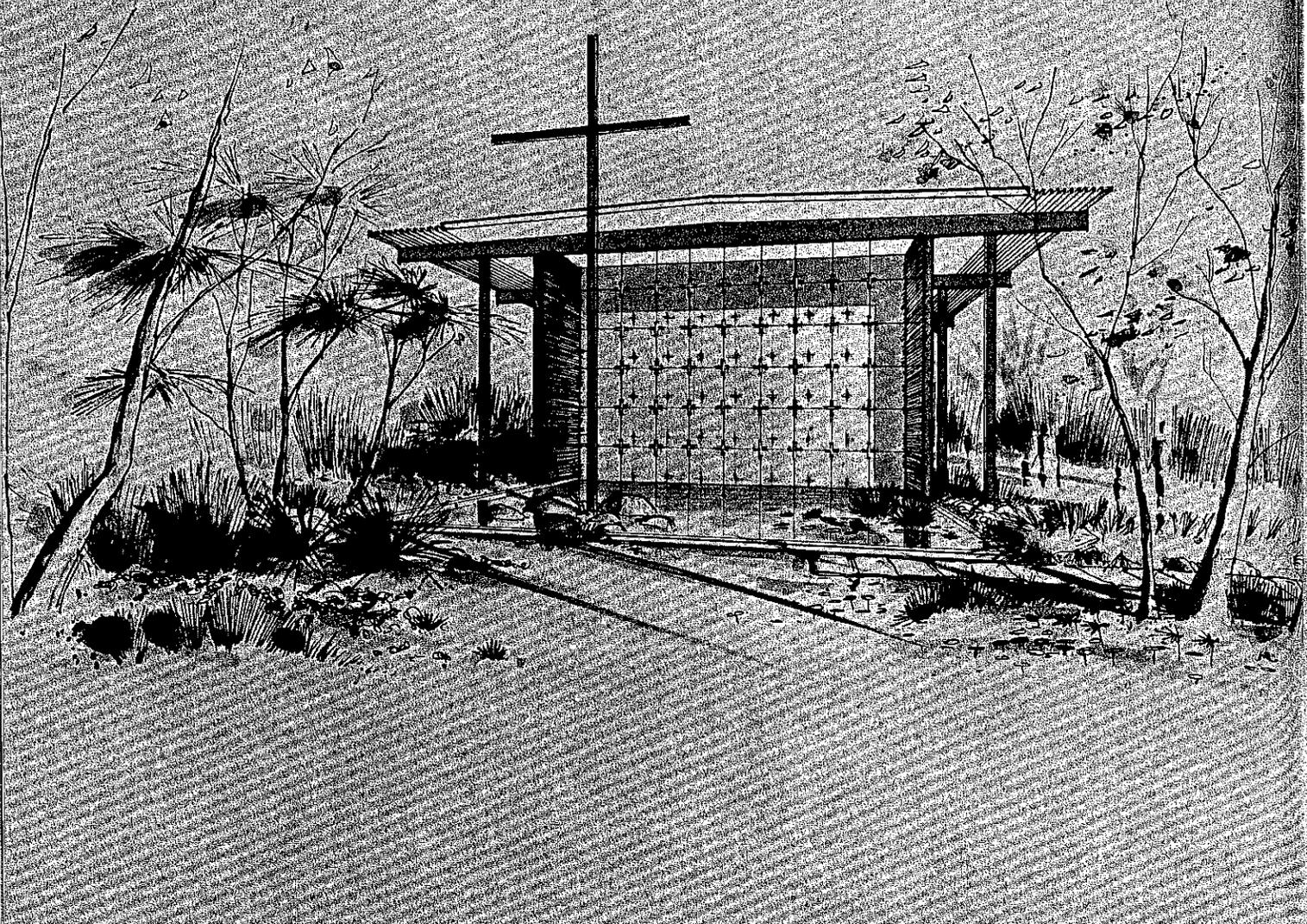
All of the buildings presented here, and the several essays on religious building problems, were first published in recent issues of *Architectural Record*. They were intended — at the very least — as a report to architect and engineer readers on developments in religious-building programming, design, and construction. Actually they have proved, in the hands of the design profession, effective instruments in broadening the horizons of building-committee members faced with the enormous responsibility of formulating a clear expression of a congregation's aspirations in such a way as to inspire rather than intimidate the design. That they have been of significant help in repeated specific instances, as well as useful in stimulating general awareness of religious design possibilities, may be attributed to both the quality and the range of examples chosen.

A great variety of faiths, of sites, of budgets, of program requirements, structural methods, and attitudes are represented here, but above all, a great variety of design characteristics; for, though the common thread of good design unites all these examples, each achieves unique character through the modifying influences of a particular architect, a particular congregation, and a particular set of circumstances. It is a broad selection, but not so broad as to include the banal or the bad.

To the building committees, architects, engineers, and artists, who have patiently and prayerfully made these buildings possible we owe a real debt, just as we do to all those who have written here of worship and design and the unity which through talent and humility may be achieved in them. The ideas stated here in words and images recommend this book for all who are concerned with re-establishing the vitality of three-dimensional religious expression in their communities and with re-establishing the leadership of the church and the temple in the arts.

John Knox Shear

March 7, 1957

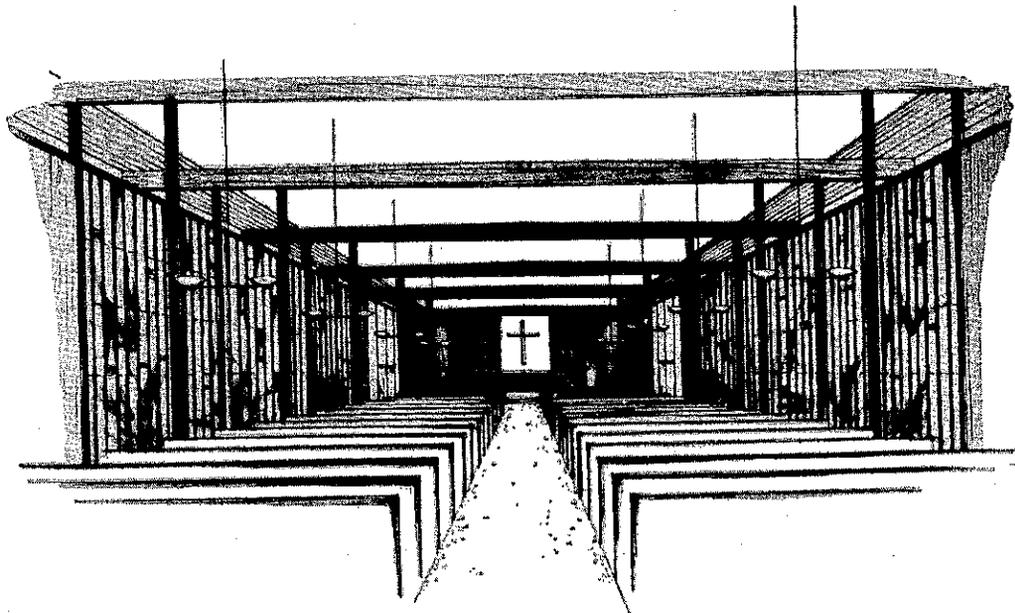
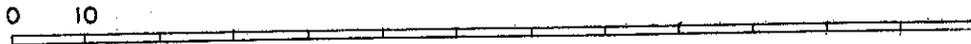
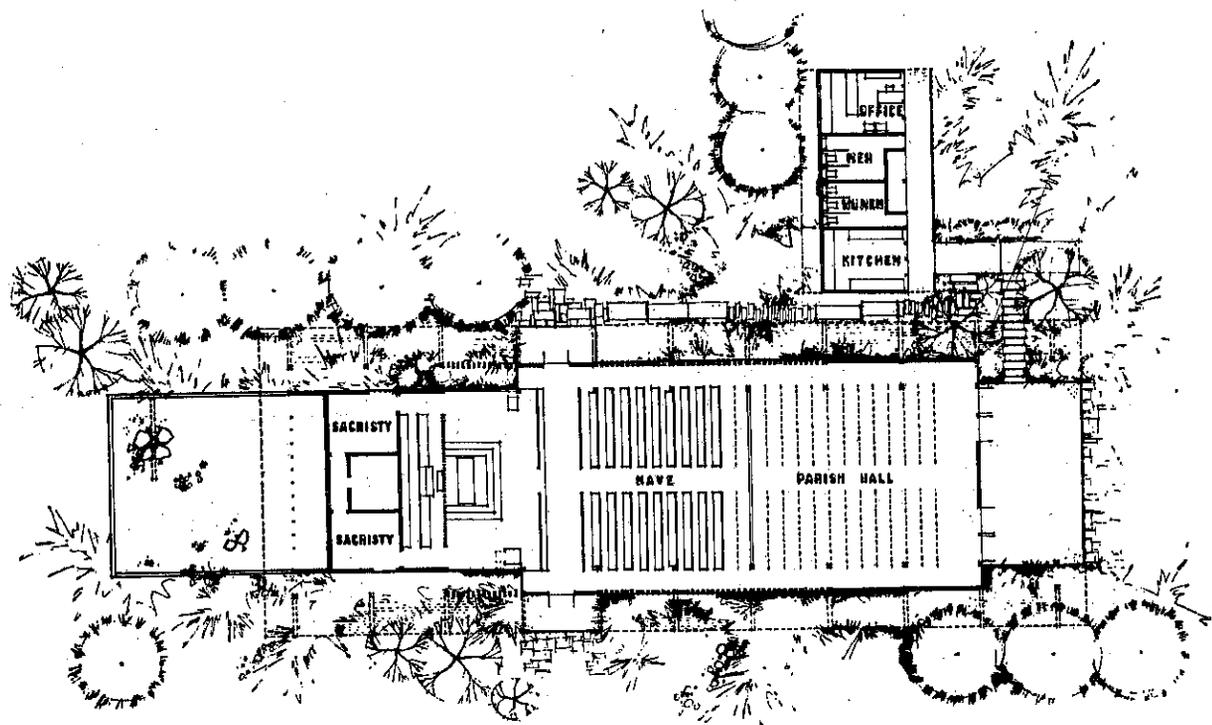


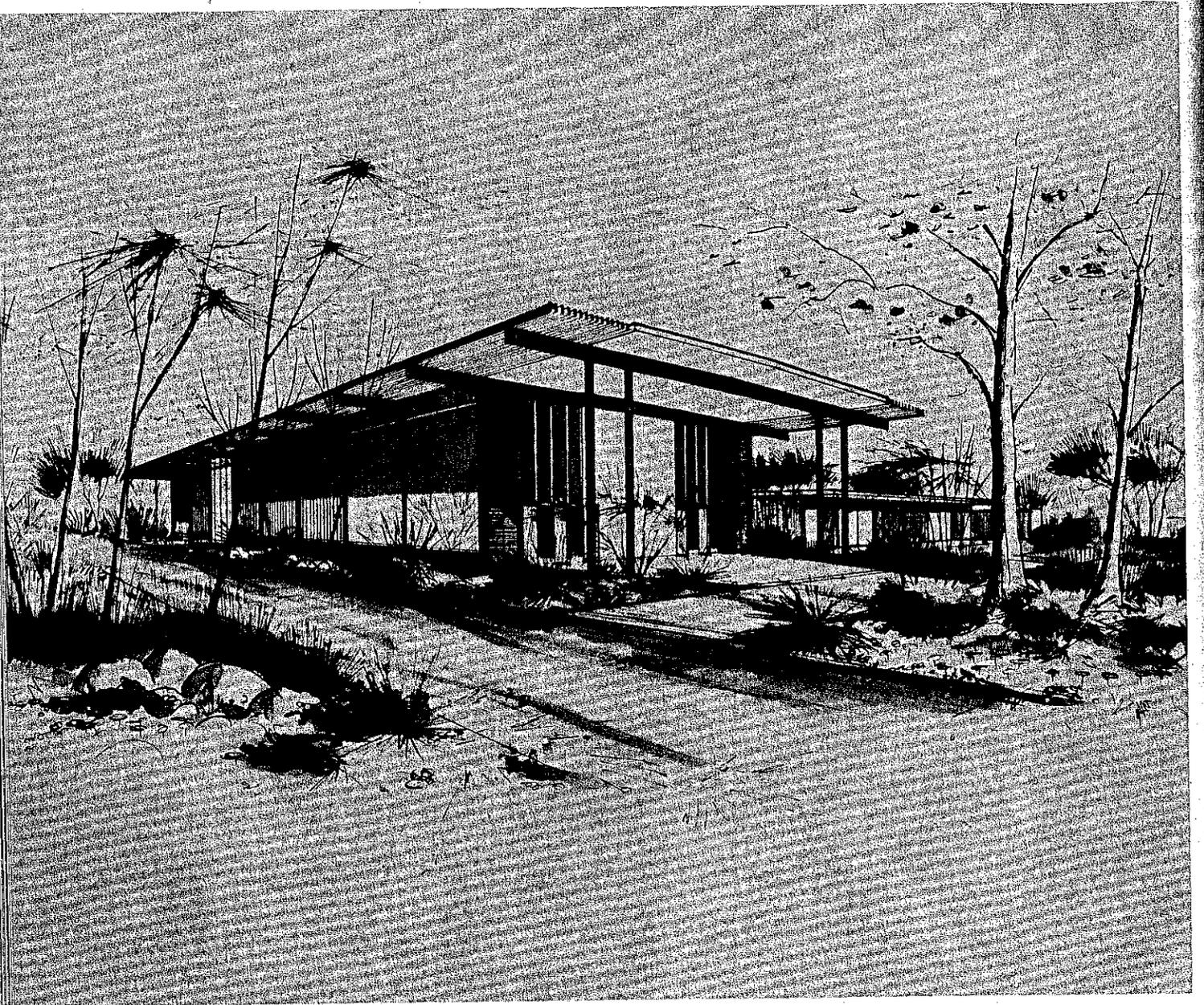
ST. MARTHA'S MISSION, WEST COVINA, CAL.

Carleton Winslow, Architect

In the final analysis instructive examples of architecture must possess and express either one dominant characteristic which is so appealing that it integrates — or at least overrides — all other aspects, or some combination of less forceful appeals which have been brought to unmistakable unity.

The proposal for St. Martha's Mission Church approaches such unity through employing in a simple constructional system a direct expression of a few modern materials, a rich color palette and a happy relationship of building to site.





Beyond the question of the appropriateness of its Oriental character for an Episcopal parish in a Los Angeles suburb there is a quality here which recommends the attention of all who must build to limited budgets as well as to those more fortunately funded.

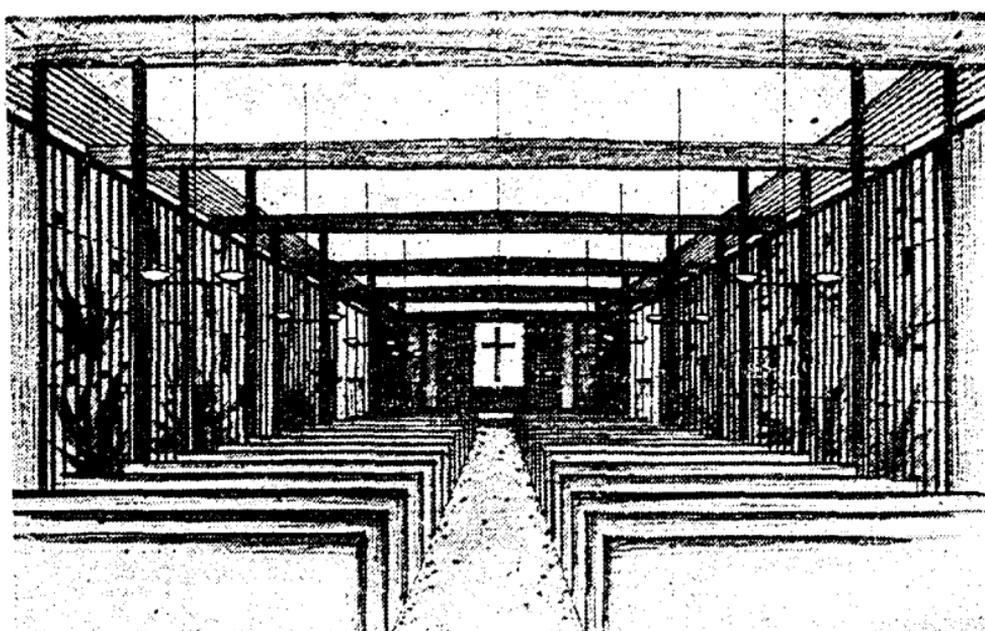
WHEN COMPLETED THIS BUILDING will stand in a grove of trees with a tall, white wooden cross rising from the side of a pool which has been arranged to reflect the end wall of the sanctuary. The wall, which is blue, will be lightly screened by a grid of wires supporting small gold crosses.

The building frame consists of laminated beams carried on square wood posts well be-

yond the side walls to keep out the direct sunlight. The broad overhangs are thus a response to a natural force in the region but provide as well — along with the range of supports which stand free of the building sides — an inviting cushion of space between the inside and the outside.

The side walls are to be entirely of burnt orange glass. Other colors are blue green, gray and royal blue.

Designed to seat 550, one end of the 150-ft. building can be closed off with sliding walls to function as a parish hall. The use of existing trees and the scaling of the building to them is unusual and rewarding.



MISSION PLANS—This is architect's drawing of interior of new St. Martha's Mission to be erected in West Covina. It will have glass walls and a flat roof.

Episcopal Churches Push Building Program

Architectural Renaissance Featured in 22 Projects Under Way or to Start Soon

Episcopal churches, like those of many other denominations, are undergoing an architectural renaissance which, it was reported yesterday, has produced a \$1,633,000 building splurge in Southern California.

Churchmen, noting the modern concept being employed in the construction of places of worship, predicted that this renaissance will radically change the whole facade of religious worship.

22 New Structures

Canon W. Clinton Billig, executive assistant to Episcopal Bishop Francis Eric Bloy, said the new building activity — currently under way or scheduled within the coming months—in Southern California is being channeled into 22 new structures at a cost of \$1,633,000, including \$375,000 for land alone.

This expression of the new style in church architecture, he explained, is coming to life in parish halls, church school classrooms, churches and related buildings, many of them multipurpose structures which serve the triple function of church, parish hall and classroom.

Perhaps the most striking, but not the most expensive, is the new St. Martha's Mission in West Covina. The plans drawn by Architect Carleton Winslow will feature a building along the lines of an open pavilion, with glass walls, a flat roof and a single great cross as the focal point.

Church Building First

St. Martha's, unlike most missions, will erect the church building first, rather than its parish hall, at a cost of approximately \$70,000.

With a seating capacity of 550 in its expanded form, the church will have a temporary wall which will divide it, thus enabling the congregation to use a portion of the nave as a parish hall.

According to the plans, natural wooden and laminated beams will be repeated the length of the building while wide eaves will protect the glass areas from the direct rays of the sun, thereby providing a "welcoming, sheltered feeling."

Other Projects

Elsewhere, work will begin in December on construction of a new parish hall and classroom building for St. Mathew's in Pacific Palisades. The parish, which was featured in an article in This Week magazine last week, will expend \$100,000 on the two units.

In Riverside, meanwhile, All Saints' recently completed two additional buildings at a cost of \$160,000. Both structures were erected on the church's five-acre site.

Holy Faith in Inglewood is planning to enlarge its church building and add a third unit to the educational facility next spring at an estimated cost of \$150,000. In Palos Verdes, St. Francis will soon begin work on a brick parish hall at a cost of approximately \$118,000.

Paddleboard Race Topic of Sermon

The Rev. Emerald L. Olsor will refer to international paddleboard races from Santa Catalina Island to Manhattan Beach in the sermon he will deliver at the 9:30 and 11 a.m. services tomorrow at the Manhattan Beach Community Church.

The title of his sermon will be "The Paddleboard Race in Religion."

Sermon Announced

The Rev. Vance Geier will preach on "Civil Responsibilities" at the 10 a.m. service tomorrow at Mt. Hollywood Congregational Church.