

Los Angeles Department of City Planning

RECOMMENDATION REPORT

CULTURAL HERITAGE COMMISSION

CASE NO.: CHC-2007-4665-HCM-CC1
HCM NO: 900

HEARING DATE: April 15, 2010
TIME: 10:00 AM
PLACE: City Hall, Room 1010
200 N. Spring Street
Los Angeles, CA
90012

Location: Crossing the Los Angeles River on
N. Spring St. between Avenue 18 and Aurora
St.
Council District: 1
Community Plan Area: Northeast Los Angeles/
Central City North
Area Planning Commission: East Los Angeles/
Central
Neighborhood Council: Lincoln Heights/
Historic-Cultural
Legal Description: Bridge #53C0859

REQUEST: Comments on Draft Environmental Impact Report/Environmental
Impact Statement (EIR/EIS) for the North Spring Street Viaduct
Widening and Rehabilitation Project

OWNER: City of Los Angeles

RECOMMENDATION That the Cultural Heritage Commission:

Adopt the proposed letter.

S. GAIL GOLDBERG, AICP
Director of Planning

[SIGNED ORIGINAL IN FILE]

Ken Bernstein, AICP, Manager
Office of Historic Resources

[SIGNED ORIGINAL IN FILE]

Lambert M. Giessinger, Preservation Architect
Office of Historic Resources

Prepared by:

[SIGNED ORIGINAL IN FILE]

Edgar Garcia, Preservation Planner
Office of Historic Resources

Attachments: A) Letter
B) January 29, 2008 OHP/BOE Agreement

FINDINGS

See Draft Letter in Attachment A.

BACKGROUND

Built in 1927, this reinforced concrete arch/T-beam bridge exhibits character-defining features of Beaux-Arts bridge design. Located on North Spring Street as it crosses the Los Angeles River between Lincoln Heights and Downtown Los Angeles, the subject structure rests on three large vertical piers in an open spandrel arch forming two arch spans. The deck of the bridge is cantilevered with large supporting brackets and exhibits a sculpted concrete railing with incised stepped rounded arches. Eight pairs of decorative column-shaped light posts are topped by octagonal-shaped lanterns.

The North Spring Street Bridge Historic-Cultural Monument #900 was designed by Merrill Butler, Engineer of Bridges and Structures for the City of Los Angeles Bureau of Engineering. The bridge was constructed by the Western Construction Company. The subject structure forms part of a monumental bridge building program dating from 1909-1932 that oversaw the construction of several bridges across the Los Angeles River. While addressing the transportation needs of the growing metropolis in the early 20th century, these bridges also embodied the values of the City Beautiful Movement which sought to beautify urban areas with Beaux-Arts style architectural design and planning for public buildings, structures, and infrastructure.

The subject bridge was built 17 years after two adjacent circa 1910 bridges: North Main Street Bridge (1910) and the North Broadway-Buena Vista Bridge (1909-1911). The design of the North Spring Street Bridge was intended to complement the Beaux-Arts and Classical design of these earlier bridges. Because of their prominent location, proximity and design affinity, the subject bridge and two other bridges function as a thematic sub-grouping.

The subject bridge has few alterations.

The North Spring Street Bridge was determined eligible for the National Register of Historic Places by the Caltrans Historic Bridge Inventory in 1986 and the Caltrans Statewide Historic Bridge Survey Update in 2004. It is listed in the California Register of Historical Resources.

In January 2008, the Los Angeles City Council declared the North Spring Street Bridge Historic-Cultural Monument (HCM) #900.

PROPOSED PROJECT

On March 15, 2010, the Bureau of Engineering released a Draft Environmental Impact Report/Environmental Assessment (DEIR/EA) for the North Spring Street Viaduct Widening and Rehabilitation Project. The proposed project seeks to widen the existing 50-foot bridge and reconfigure the road network around the vicinity of the subject bridge.

The submittal of the following communication and its comments follows an agreement signed on January 29, 2008 between the Department of City Planning and Bureau of Engineering formalizing a review process for the Cultural Heritage Commission to provide input within the CEQA and Section 106 processes. The Cultural Heritage Commission is also to receive quarterly updates by the Bureau of Engineering on the city-wide bridge program.

Written comments to the Bureau of Engineering are due by April 28, 2010.

ATTACHMENT A.

Linda Moore, Environmental Supervisor
Bridge Improvement Program
Bureau of Engineering, City of Los Angeles
221 N. Figueroa Street, Suite 350
Los Angeles, CA 90012

April 1, 2010

Dear Ms. Moore:

On behalf of the Cultural Heritage Commission and the Office of Historic Resources, thank you for the opportunity to formally comment on the Draft Environmental Impact Report/Environmental Impact Statement (DEIR/EIS) for the North Spring Street Viaduct Widening and Rehabilitation Project. As you know, the North Spring Street Bridge has been determined eligible for the National Register of Historic Places, is listed in the California Register of Historical Resources, and is designated as Historic-Cultural Monument (HCM) #900 under the City's Cultural Heritage Ordinance.

One of the Cultural Heritage Commission's primary responsibilities in its capacity as a Mayor-appointed decision-making body is overseeing the preservation and safeguarding of the City of Los Angeles' nearly 1000 Historic-Cultural Monuments (HCMs). The monumental Los Angeles River bridges between Downtown and Griffith Park are some of the City's most iconic landmarks with a total of 14 bridges designated as HCMs, including the North Spring Street Bridge. Constructed in 1927 near the original site of the founding of the City, the bridge is situated in one of the most historically rich areas of the City. The bridge is also located between two of the oldest Los Angeles River Bridges, the North Main Street Bridge (1910) and the North Broadway-Buena Vista Bridge (1911).

Based on an agreement signed on January 29, 2008, the Department of City Planning and Bureau of Engineering formalized a review process that allowed the Cultural Heritage Commission to provide input at appropriate milestones in the CEQA and Section 106 processes and receive quarterly updates on the bridge program. In light of not having received any updates from the Bureau of Engineering in the last nine months, we stress the need for better communication between our departments and a commitment to providing the Cultural Heritage Commission updates on the bridge program as promised by Bureau of Engineering staff.

This is the second opportunity that the Cultural Heritage Commission and the Office of Historic Resources have had to formally comment on a project affecting an HCM under the Bureau of Engineering's bridge program. The Cultural Heritage Commission has previously expressed concern over the potential of the bridge program to adversely impact the City's historic Los Angeles River bridges, potentially rendering them ineligible as historic resources.

Based on the alternatives discussed in the DEIR, the North Spring Street Widening and Rehabilitation project also has the potential to demolish Historic-Cultural Monument #872, the Raphael Junction Block Building, constructed in 1889 and designated in 2007.

After careful review of the DEIR, the Cultural Heritage Commission submits the following substantive comments:

Cultural Heritage Commission Comments

1) The DEIR neglects to cite the North Spring Street Bridge's designation as a Historic-Cultural Monument (HCM #900) in all major sections of the DEIR.

The DEIR omits any reference to the subject bridge's Historic-Cultural Monument status. In light of the Bureau of Engineering's active involvement during the HCM designation process in 2007, this lapse is very pressing and has therefore resulted in a DEIR that does not adequately address the local designation of the subject bridge as a historic resource.

2) The DEIR should evaluate which alternatives would allow for the North Spring Street Bridge to retain Historic-Cultural Monument (HCM) status and listing in the National Register of Historic Places /California Register of Historical Resources.

As part of its CEQA evaluation, the DEIR does not evaluate alternatives to address the local designation of the subject bridge as a Historic-Cultural Monument. Alterations to the North Spring Street Bridge under a widening alternative (V-2; V-3; V-4) would potentially result in a loss of its HCM designation. For the Final EIR, all alternatives should be assessed to study specifically the potential impacts on HCM eligibility, as well as continued eligibility for the National Register and California Register.

3) The July 2002 substandard sufficiency rating of 74.2% that is driving the need for the project is only 5.8% less than the minimum 80%. [Chapter 1]

The Federal Highway Administration (FHWA) has an inspection criteria that rates bridges "substandard" and eligible for federal funding if rated under 80%. Because of the minimal percentage difference, the analysis that determined the current sufficiency rating should be reevaluated. The Guidelines for Historic Bridge Rehabilitation and Replacement (2007) by the American Association of State Highway and Transportation Officials (AASHTO) have recommended that historic preservation considerations be applied for determining the feasibility of bridge rehabilitation projects when assessing substandard ratings.

4) Strategy R-D has conflicting information concerning Historic-Cultural Monument #872, Raphael Junction Block Building. [Chapter 1]

The description for Strategy R-D concerning the Roadway component of the proposed project states that the proposed reconfiguration streets would "avoid acquisition of the Raphael Junction Block building;" however, it still calls for the acquisition of 1635 North Spring Street. The 1635 North Spring Street property address is the Raphael Junction Block Building.

5) Alternative Strategy V-5, construction of a new pedestrian/cyclist bridge, should be reconsidered. [Chapter 1]

Strategy V-5 proposed "constructing a pedestrian and bicycle bridge adjacent to the existing Viaduct" but was eliminated as an alternative. This alternative would meet most of the project goals while still allowing the subject bridge to retain its National Register eligibility, California Register listing, and HCM designation.

6) The DEIR relies upon artificial constraints on the subject bridge's current width, which have significantly driven the analysis of project alternatives.

A wider bridge could result in significant impacts on communities on both sides. While it is well known that additional street capacity quickly fills up when it becomes available, in this case the wider footprint of the new bridge will immediately become constricted into narrower arterial streets on the western side of the proposed project. Furthermore, Federal standards regarding bridge width appear to be artificially constraining alternatives and limiting preservation options. The Final EIR should explore successful approaches nationally to preserving historic bridges, including possible opportunities to work with Federal officials to maintain existing widths for historic bridges.

The Final EIR should also consider the extent to which the bridge's overall footprint itself may be considered a character-defining feature of the existing Monument. Additionally, the Final EIR should evaluate the cost-savings of maintaining the scope of the project within the footprint of the current bridge, thereby eliminating the need to acquire private property as necessitated by a bridge widening.

7) The DEIR is accurate in stating that the Build Alternatives for widening the subject bridge would have an adverse impact and are inconsistent with the Secretary's Standards for the Treatment of Historic Properties but neglects to state the loss of historic resource eligibility . (2.7.3.3., Chapter 2)

The Environmental Consequences section of the DEIR is largely correct in discussing the effects of the widening alternative to the historic resource, but fails to explicitly state that the proposed project may result in National Register eligibility, California Register delisting, and potential loss of HCM designation.

8) The potential mitigation measures for Build Alternatives 2 to 4 are inadequate. [2.7.7, Chapter 2]

The mitigation measures listed for widening of the subject bridge and demolition of the Raphael Junction Block building are inappropriate. The two mitigation measures simply call for HABS recordation and photo-documentation of the North Spring Street Bridge and the Raphael Junction Block building. This approach is entirely inadequate to mitigate the loss of two Historic-Cultural Monuments.

9) The DEIR's Cumulative Impacts sections inadequately addresses potential cumulative impacts of the Bureau of Engineering's bridge program and other planned projects. [Chapter 2].

Section 2.2.5 states that "no other projects are expected to impact land uses near the proposed project." However, Bureau of Engineering staff have previously discussed a planned project for the North Main Street Bridge (HCM #901), near the subject bridge and within viewing distance, which involves the construction of a new bridge. Previous reports have discussed the North Broadway-Buena Vista Bridge (1911), the North Main Street Bridge (1910), and the subject bridge as a thematic subgrouping which would be impacted by the bridge program's planned projects.

The DEIR also failed to acknowledge the Los Angeles-Palmdale EIR/EIS California High-Speed Rail Project which may propose rail alignments that will impact the North Spring Street Bridge and its vicinity.

10) The Less than Significant Impact finding in the Visual Mitigation section of the Visual Impact Assessment does not adequately assess impacts by the widening of the bridge. [Appendix N.]

The alternatives that call for the widening of the subject bridge, addition of new piers and deck, and replacement of character-defining features would permanently obscure and alter original 1927 features. Additions made “in like” to mimic lost elements, such as the railing, light fixtures, and piers, would be misconstrued as being original character-defining features. The addition of 40 feet to the width of the subject bridge would also adversely affect the spatial relationship between these features in relation to the road width, appearing under-scaled and overwhelmed by the size of the roadway.

11) The DEIR fails to cite the Guidelines for Historic Bridge Rehabilitation and Replacement by the American Association of State Highway and Transportation Officials (AASHTO).

Conducted as part of the National Cooperative Highway Research Program (NCHRP) and requested by the American Association of State Highway and Transportation Officials (AASHTO) in 2007, the report sought to establish guidance for balanced and consistent decision making in “rehabilitation versus replacement” bridge projects. As a pertinent project dealing with these same issues, the report should be addressed as part of the DEIR.

12) The Area of Potential Effects (APE) determined in 2005 appears to inadequately encompass the buildings impacted by the project. [Appendix H]

The APE as established in consultation between the California Department of Transportation (Caltrans) and the Bureau of Engineering through the Section 106 review appears to selectively exclude buildings immediately adjacent to the subject bridge as well as buildings fronting North Spring Street. A cursory review of these buildings and their respective construction dates through the Zoning Information and Map Access System (ZIMAS) reveals that all these buildings are pre-WWII era and over 45 years old:

1640 N. Spring Street: 1925

1727 N. Spring Street: 1914

1700 N. Spring Street: 1901

1719 N. Spring Street: 1910

1726 N. Spring Street: 1920/1934

13) The survey of three properties that were recorded under the existing APE dates to 2002 and as such as is now nearly 10 years old. [Appendix I]

The survey of three properties that were found to be ineligible for the National Register of Historic Places was performed in 2002. Since that date, one of the buildings, 1635-39 N. Spring Street, was declared a Historic-Cultural Monument.

14) The Historic Property Survey Report has outdated contact information for the Cultural Heritage Commission in the Consulting Parties/Public Participation section.

[Appendix H.]

Section 3 contains “Ms. Isabel Rosas, Commission Executive Assistant II, Los Angeles Cultural Heritage Commission” as a contact person in the Consulting Parties/Public Participation Section of the Appendix H. Ms. Rosas left her position in 2004. Please replace her name with “Mr. Edgar Garcia, Preservation Planner, Office of Historic Resources, Department of City Planning.”

15) The DEIR’s Distribution List should update its contact information for the Office of Historic Resource, Department of City Planning. [Chapter 6]

The DEIR mailing lists Mr. Glen Dake, Cultural Heritage Commission member, as the contact person for the Office of Historic Resources. It would be more appropriate to list staff members of the Office of Historic Resources in the Distribution List. Please replace Mr. Dake’s name with Mr. Ken Bernstein, Manager of the Office of Historic Resources. This should be corrected to ensure proper notification procedures.

The Cultural Heritage Commission urges the Bureau of Engineering to address the comments and concerns provided and develop Standards-compliant EIR alternatives that would allow for the maximum retention of the North Spring Street bridge in its current configuration and ensure its protection as a Historic-Cultural Monument. The Cultural Heritage Commission also supports roadway alternatives that will not require the demolition of HCM #872, the Raphael Junction Block building.

To ensure the Cultural Heritage Commission’s continued input on this project, we formally request a future presentation at a scheduled public hearing upon the release of the Final Environmental Impact Report (FEIR). Your continued dialogue with the Office of Historic Resources and our Commission is greatly appreciated.

Thank you for this opportunity.

Sincerely,

RICHARD BARRON, President
Cultural Heritage Commission

DEPARTMENT OF
CITY PLANNING
OFFICE OF HISTORIC RESOURCES
200 N. SPRING STREET, ROOM 620
LOS ANGELES, CA 90012-4801
(213) 978-1200

—
CULTURAL HERITAGE COMMISSION

RICHARD BARRON
INTERIM PRESIDENT
GLEN C. DAKE
MIA LEHRER
ROELLA LOUIE
OZ SCOTT

—
COMMISSION OFFICE
(213) 978-1300

CITY OF LOS ANGELES
CALIFORNIA



ANTONIO R. VILLARAIGOSA
MAYOR

EXECUTIVE OFFICES

S. GAIL GOLDBERG, AICP
DIRECTOR
(213) 978-1271

EVA YUAN-McDANIEL
DEPUTY DIRECTOR
(213) 978-1273

FAX: (213) 978-1275

INFORMATION
(213) 978-1270

www.lacity.org/PLN

DATE: January 29, 2008

TO: Los Angeles City Council

FROM: Office of Historic Resources, Department of City Planning
River Unit, Department of City Planning
Bureau of Engineering, Department of Public Works

SUBJECT: **REQUEST TO DESIGNATE 11 LOS ANGELES RIVER BRIDGES AS HISTORIC-CULTURAL MONUMENTS (COUNCIL DATE: JANUARY 30, 2008; ITEMS 60-70)**

The Cultural Heritage Commission has recommended designation of 11 Los Angeles River bridges as City Historic-Cultural Monuments. All but one of these bridges (the Riverside-Figueroa Bridge) already has official historic status: they have been formally determined eligible for the National Register of Historic Places and are listed in the California Register of Historical Resources. Three other Los Angeles River bridges are already designated as Historic-Cultural Monuments. The bridges' existing historic status requires that any proposed alterations to the bridges go through two layers of historic preservation review:

- 1) All bridge projects are reviewed under the California Environmental Quality Act (CEQA), which requires that any adverse impacts to the historic features of the bridge be analyzed in an Environmental Impact Report (EIR)
- 2) Because federal money is typically utilized on the bridge projects, further historic preservation review and public consultation is required under Section 106 of the National Historic Preservation Act and Section 4(f) of the Department of Transportation Act of 1966. These reviews involve consultation with the public and with interested parties, and require that the project avoid adverse effects to the historic bridges whenever feasible. When adverse effects cannot be avoided, the Section 106 process typically culminates in the development of a Memorandum of Agreement (MOA), with the involvement of the State Office of Historic Preservation, detailing proposed historic preservation mitigation measures to minimize project impacts.

Because these existing review processes create considerable oversight on historic preservation issues, the City's Cultural Heritage Commission and the Department of City Planning's Office of Historic Resources do not wish to create an additional, burdensome review process if the bridges also become City Historic-Cultural Monuments. The Department of City Planning and Bureau of Engineering have therefore met three times in recent weeks to reach agreement on a review process that provides for appropriate and

streamlined local input. The two agencies have developed the attached flow chart that provides for the City's Cultural Heritage Commission's and Office of Historic Resources' review at appropriate milestones in the CEQA and Section 106 processes. These coordinated reviews will help ensure that Historic-Cultural Monument status will not result in additional delays for the Bridge Improvement Program.

At the request of Councilmember Ed Reyes at the January 22 Planning and Land Use Management (PLUM) Committee meeting, the Bureau of Engineering, the Office of Historic Resources, and the River Unit of the Department of City Planning's Citywide Division have met to provide further coordination in ensuring river access from each of the bridges under consideration as Historic-Cultural Monuments. Due to the unique physical constraints and opportunities presented at each of the bridge locations ongoing coordination between these staffs will be required. This is especially true given the design changes to the River channel itself and the adjacent River Greenway that will occur at varying points along the River over a period of time.

The monthly Los Angeles River Task Force meetings, which include management and staff representation from a broad number of city departments and agencies, offers the ideal situation to ensure a regular and ongoing dialogue to discuss and explore access issues as planning and capital funding opportunities arise for specific locations. The Bureau of Engineering's bridge program has also worked closely with LA River advocates and community organizations in shaping its Bridge Improvement Program.

The following attachments provide a summary of the bridges that are being considered for the City Historical-Cultural Monument designation and the opportunities and obstacles presented by each of the bridges given their surrounding physical attributes.



KEN BERNSTEIN
Manager, Office of Historic Resources
Department of City Planning

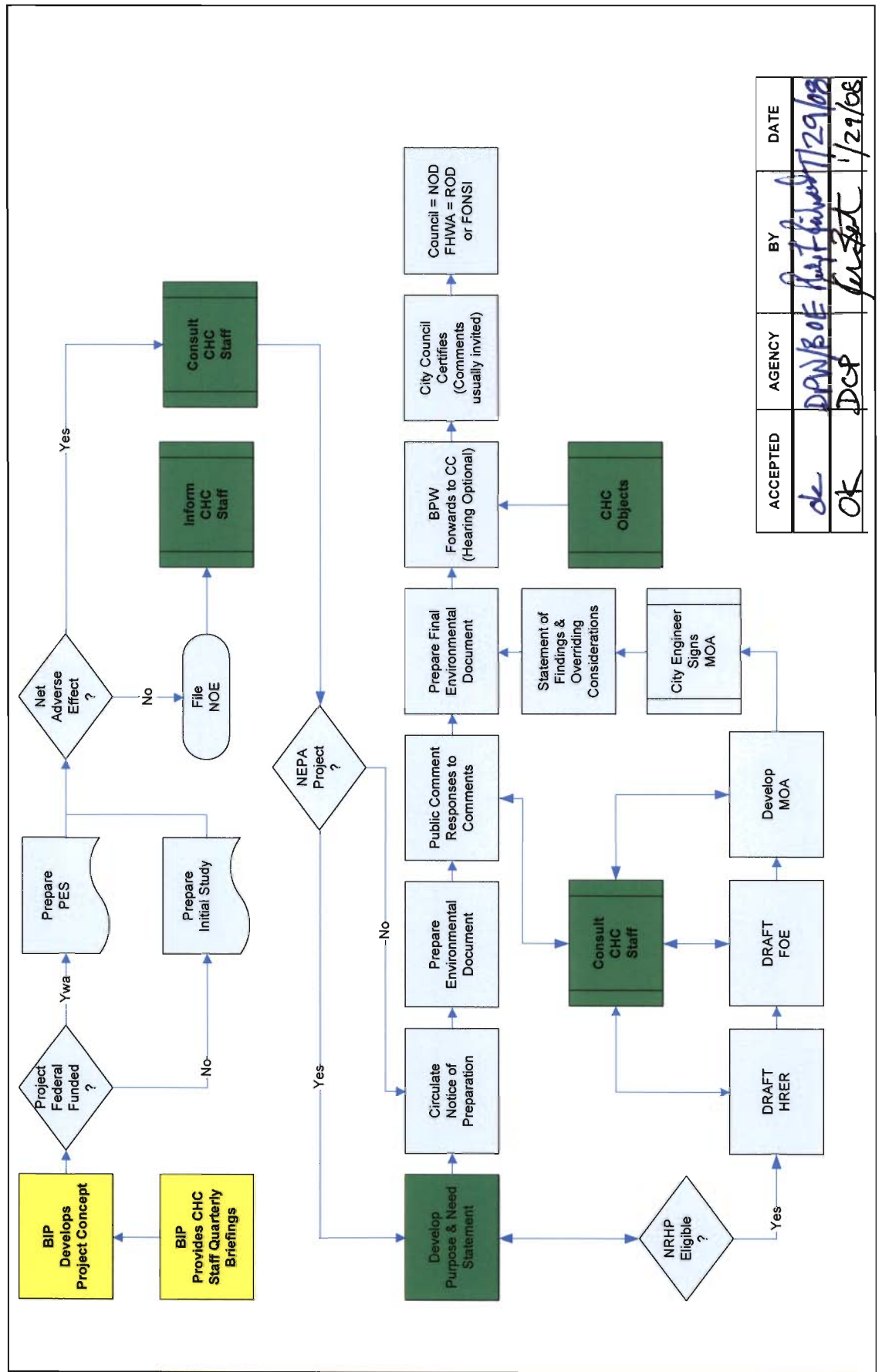


PHILIP L. RICHARDSON
Program Manager, Bridge Program
Bureau of Engineering



CLAIRE BOWIN, AICP
River Unit
Department of City Planning

BIP – OHP CONSULTATION FLOWCHART REVISED POST 1-14-08 MEETING



ACCEPTED	AGENCY	BY	DATE
OK	DPN/BOE	Paul Finkbeiner	1/29/08
OK	DCP	Janet	1/29/08