Los Angeles Department of City Planning
RECOMMENDATION REPORT

CULTURAL HERITAGE COMMISSION | **CASE NO.: CHC-2007-4658-HCM-CC1**

HEARING DATE:	July 30, 2009	Location: Crossing the Los Angeles River on 6th Street between S. Boyle Ave. and Mateo St.
TIME:	10:00 AM	Council District: 14
PLACE:	City Hall, Room 350 200 N. Spring Street Los Angeles, CA 90012	Community Plan Area: Boyle Heights/ Central City North Area Planning Commission: East Los Angeles/ Central Neighborhood Council: Boyle Heights/Historic Cultural Legal Description: Bridge #53C1880

REQUEST: Comments on Draft Environmental Impact Report/Environmental Impact Statement (EIR/EIS) for the 6th Street Viaduct Seismic Improvement 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, Manager, AICP
Office of Historic Resources

[SIGNED ORIGINAL IN FILE]

Lambert M. Giessinger, Preservation Architect
Office of Historic Resources

Prepared by:

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Edgar Garcia, Preservation Planner
Office of Historic Resources

Attachments: A) Letter

FINDINGS

See Letter in Attachment A.

BACKGROUND

Built in 1932, this reinforced concrete T-beam/steel arched bridge exhibits character-defining features of Art Deco-Streamline Moderne monumental bridge design. Located on 6th Street as it crosses the Los Angeles River between Boyle Heights and Downtown Los Angeles, the subject structure rests on several T-beam vertical piers with three larger vertical piers at its center where it crosses the Los Angeles River. Two massive 150-foot wide, asymmetrical steel through-arch spans originate at the center pier and terminate at the deck level. Two pairs of 40-foot high monumental pylons with fluted and zig-zag design are located on both approaches to the Sixth Street Bridge. A single non-structural mid-size pylon with rounded balustrade and landscaping is located on the intersection of Sixth Street and Boyle Avenue as a decorative prelude to the bridge entrance (a parallel decorative structure is now missing). The deck of the bridge exhibits a sculpted concrete railing with incised stepped rounded arches. Low-height pylons support rounded electroliers with geometric and floral designs. Four pairs of octagonal light fixtures with geometric and floral designs are located in the middle section of the deck.

The Sixth Street Bridge Historic Cultural Monument #905 was designed by Merrill Butler, Engineer of Bridges and Structures for the City of Los Angeles Bureau of Engineering along with Louis Huot and Louis Blume. At nearly 4,000 feet (2/3rds of a mile long), the subject structure was the largest and longest bridge constructed on the Los Angeles River and the largest concrete bridge built in Los Angeles.

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 Sixth Street Bridge was the culmination of this effort to construct concrete bridges on a monumental scale and design, through its sheer enormous size and length and its attention to architectural detail. The Sixth Street Bridge was also the first bridge in Los Angeles to move beyond the Beaux-Arts and Period Revival design aesthetic, moving away from literal references to Classical styles to sparser and more streamlined designs. As the first bridge in Los Angeles to incorporate Moderne and Art Deco design elements, the subject structure greatly influenced future bridge design in Los Angeles. Nearly all bridges built by the City of Los Angeles after 1932 would be constructed in Moderne styles with many, like the West Boulevard Bridge in Mid-City (1933) and the Gaffey Street Bridge in San Pedro (1935), using decorative elements directly lifted from the Sixth Street Bridge.

Alterations include the removal of two pairs of central piers and the addition of contemporary street lighting to the subject structure's electroliers.

The Sixth 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.

In January 2008, the Los Angeles City Council declared the Sixth Street Bridge Historic-Cultural Monument (HCM) #905.

ATTACHMENT A.

Ronald J. Kosinski, Deputy District Director
Division of Environmental Planning
Department of Transportation, District 7
100 S. Main Street MS-16A
Los Angeles, CA 90012

July 30, 2009

Dear Mr. Kosinski:

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 6th Street Viaduct Seismic Improvement Project. As you know, the 6th Street Viaduct has been determined eligible for the National Register of Historic Places and is designated as Historic-Cultural Monument (HCM) #910 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). Since the designation of the Sixth Street Bridge as an HCM, the Cultural Heritage Commission has expressed concern over the potential demolition of this iconic landmark as part of its seismic improvement project. Members such as Commissioner Glen Dake have worked closely with the Bureau of Engineering, particularly in studying options to address the bridge's Alkali-Silica Reaction (ASR) condition.

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. 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 6th Street Bridge's designation as Historic-Cultural Monument #905 in the Executive Summary. The Introduction and Background section of the DEIR omit any reference to the subject bridge's Historic-Cultural Monument designation or its inclusion in the California Register of Historical Resources and eligibility for placement in the National Register of Historic Places.

2) The DEIR should evaluate which alternatives would allow for the 6th Street Bridge to retain Historic-Cultural Monument (HCM) status. As part of its CEQA evaluation, the DEIR does not evaluate the alternatives to address the local designation of the subject bridge as a Historic-Cultural Monument. Demolition of the 6th Street Bridge under a replacement alternative would result in a loss of its HCM designation. A full replication/reconstruction alternative and/or sufficient retention of existing character-defining features may allow for the proposed project to retain its HCM designation.

3) The DEIR does not provide a full replication/reconstruction alternative. Of the bridge concepts for the replacement alternative presented in Chapter 2 of the DEIR, "Bridge Concept 1-Main Span Replication" offers only a partial replication of the existing bridge. The reconstruction component would be limited to the span of the new bridge that crosses the Los Angeles River. It must be noted that many design elements within this section in the "Main Span Replication" will in fact not be replicated:

a) the bridge railing will be a new design with an 8-foot stainless steel wire projectile barrier.
b) the two main center pylons will be a new "Deco" design not based on the original landmark 1932 pylons.
c) original light fixtures will not be reproduced.
d) the two iconic double-arched steel will not be entirely replicated, utilizing a different number of steel columns and not reproducing the steel latticework located between each paired archway.

The discussion of this alternative in the Bridge Type Selection-Advance Planning Study Phase describes this alternative as "taking cues from the original bridge [that] pays homage to the original landmark bridge design" and "capturing the essence of the old landmark bridge." As described, the replacement bridge's span replication is not in fact a replication, but rather a new design taking some architectural and design cues from the historic 6th Street Bridge and reinterpreting them.

Lacking in the DEIR is a full replication/reconstruction alternative that would attempt to the greatest extent possible, using original architectural plans and archival material, to reconstruct the existing subject bridge. For this type of alternative, the Secretary of the Interior's Standards for Reconstruction would apply in developing a proposed project that would comply with preservation guidelines. As a case study, the City of Pasadena successfully reconstructed the 1913 Colorado Street Bridge in the early 1990s to successfully correct structural and safety deficiencies.

4) The DEIR should include study of an additional partial preservation alternative. The replacement alternative in the DEIR preserves none (0%) of the existing historic bridge; the retrofit alternative retains 95% of the viaduct. Somewhere in between 0% and 95% may be a project alternative that retains the eligibility of the bridge as a Historic-Cultural Monument and/or as a contributor to the National Register-eligible district of bridges while addressing the ASR-related issues.

The DEIR does acknowledge that the bridge contributes to a CRHR-eligible district, thereby finding that Alternative 2 would have a less than significant impact to the district. The partial preservation alternative selected should retain the bridge as a contributor to this ensemble of historic bridges.

5) The DEIR should include study of a preservation alternative that involves constructing a new bridge adjacent to the existing historic bridge. [2-45] The DEIR should further evaluate Alignment 9 for design consideration; having been dismissed, only three of the 10 identified alignments were reviewed for study. This alignment would permit for the construction of a new bridge parallel to the existing 6th Street Bridge, allowing for the preservation of the Historic-Cultural Monument and exploring new uses.

6) The potential mitigation measures under Alternative 3-Replacement in Chapter 3.9 (Cultural Resources) are inadequate. [3-148-149] The mitigation measures listed for a possible replacement project are inappropriate:

a) The first mitigation measure states that "the City would install two Cultural Heritage Commission plaques" at each end of the new replacement bridge. Since the new replacement bridge would most likely have lost its Historic-Cultural Monument designation, it would be inappropriate to use the Cultural Heritage Commission's Plaque Program for an HCM that would no longer be extant.

b) There is no stated mitigation measure that involves physical retention of some character defining features of the existing historic bridge. Under the replacement alternative, a new replacement bridge could potentially incorporate architectural elements of the existing bridge. Another possibility is to relocate architectural elements to a new location in a public setting.

7) The proposed location for the retention and reuse of the historic bridge's original steel arches in the replacement alternatives may be inappropriate. All replacement alternatives in the DEIR propose recycling the iconic original steel arches and relocating them to the two entrances at the abutments. The Bridge Type Selection-Advance Planning Study Phases states:

> *In respect to the historical landmarking of the existing bridge, the original steel arches that will be removed from their central location will be re-used as gateway monuments at the abutments. This will honor the original landmark by keeping it on site. This monumental gateway entry, at both ends of the viaduct, marks a beginning and an end point for the traveler along this long span, also acting as an homage to this popular historical structure.* [Page 30]

Although the effort to conserve the original steel arches on site is applauded, their new location is not ideal and may present some contextual design issues.

8) The DEIR is silent on the effects of the proposed alternatives on architectural elements of the subject bridge that are not structurally linked to the 6th Street Bridge. During the HCM designation of the 6th Street Bridge, the staff of the Office of Historic Resources (OHR) identified two architectural elements that are not structurally linked to the actual bridge but are nonetheless important character-defining features of the bridge that were constructed alongside the bridge itself:

> a) On the southwest corner of Boyle Avenue and Whittier Boulevard in the Boyle Heights side of the 6th Street Bridge is a decorative pylon and semi-circular railing matching the design and material of the 6th Street Bridge. A matching decorative feature appears to have once existed on the opposite side of the street. Located several hundred feet from the actual structure of the 6th Street Bridge, this architectural element appears to be an original 1932 feature and has served as a gateway feature to the subject bridge for the Boyle Heights community.
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> b) Directly beneath the 6th Street Bridge as it crosses Santa Fe Avenue on the western section of the bridge is a separate substructure consisting of a tunnel entrance leading to the Los Angeles River. The tunnel entrance as it descends below grade is surrounded by a decorative Art Deco-style railing, surrounding the opening on three sides. Low-

height pylons with geometric and floral designs support pairs of octagonal light fixtures matching those on the subject bridge's deck.

The DEIR does not identify these two features and therefore does not explain whether these features would be demolished or retained in the alternatives. OHR staff has identified these as historic character-defining features of the 6th Street Bridge.

9) The DEIR neglects 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.

10) Mitigation measures MM-4 and MM-15 in Section 4.9 of CEQA Evaluation appear to imply that an MOA has already been executed between SHPO, City of LA, and Caltrans. [4-31, 4-33] Proposed mitigation measures MM-4 and MM-15 state, "Implement all stipulations of the executed Memorandum of Agreement (MOA) between the State Historic Preservation Officer (SHPO), City of Los Angeles, and Caltrans." The public and interested parties have not had the opportunity to review the DEIR and analysis the range of alternatives. It would therefore be inappropriate to bypass this discussion and skip directly to the selection of final mitigation measures that assume adoption of the preferred alternative identified in the FOE and DEIR. The Cultural Heritage Commission has not yet reviewed this MOA language. If the MOA is not yet executed, its inclusion in the DEIR would constitute deferred mitigation, which is impermissible under CEQA.

11) SHPO's role in concurrence with a finding of eligibility and with the HPSR is very unclear. [3-137] If the subject bridge was formally determined eligible for the National Register, then SHPO concurrence should have occurred. It is also unclear why and whether there was no response from SHPO, since the State Historic Preservation Officer has participated in meetings on this proposal.

12) Chapter 2 of the DEIR acknowledges the vote taken by the Community Advisory Committee (CAC) in selecting the "Through Arches Category" replacement bridge type, but does not clarify that this is support for a full replication alternative. [2-49] The Public Input section of the Proposed Project Alternatives mentions the CAC's majority vote for the "Through Arches Category" replacement bridge type (1-R). The summary text does not acknowledge that this is support for the existing historic bridge design. In the illustrated section for the alternative, Figure 2-17 states "This is the existing bridge" in describing the 1R alternative. This CAC supported alternative is also titled "Alternative 1R-Replication" in Figure 2-18.

13) The DEIR's account of the Community Advisory Committee (CAC) actions and comments do not reflect the meeting minutes and the discussion by community members. [5-3] The summary of the CAC's activities are vague and misleading:

a) The DEIR neglects to mention the CAC's vote on bridge alternatives that took place on August 28, 2007 (CAC Meeting #4). As stated in Comment 9, this vote for the replication/reconstruction alternative received the overwhelming majority of votes.

b) CAC Meeting #7 states "most CAC members present at the meeting were in support of the replacement alternative with the modern bridge type." The meeting minutes do not indicate this assertion.

c) The description of discussions that took place on February 12, 2009 (CAC Meeting #8) is misleading, stating "a few CAC members were vocal about the bridge type (cable-supported concept) recommended by PDT." This exchange was in fact opposition to the cable-supported alternative and concern that their vote in support for the replication/reconstruction alternative was disregarded.

14) The DEIR's Cooperating and Participating Agency Mailing List has incorrect contact information for the Office of Historic Resource, Department of City Planning. [Appendix J] The DEIR mailing lists Mr. Jay M. Oren, Historic Preservation Officer, with the Cultural Affairs Department. Mr. Oren has been retired from this position since 2006. The list also provides a mailing address at the Cultural Affairs Department for the Cultural Heritage Commission. The CHC has been under the auspices of the Department of City Planning since 2004. The mailing addresses should be corrected to ensure proper notification procedures.

As one of the most iconic and recognized bridges in Los Angeles, the 6th Street Bridge demands utmost care and dedication in developing a seismic improvement project that will ensure its continued legacy as a beloved landmark. The Cultural Heritage Commission trusts that these comments will be pertinent in addressing the concerns and issues regarding the potential loss of the 6th Street Bridge and in developing EIR alternatives that should allow for the maximum retention of the existing bridge and/or a Standards-compliant reconstruction option.

Thank you for this opportunity.

Sincerely,

Richard Barron, President
Cultural Heritage Commission