



August 17, 2009

Submitted by email

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City of Los Angeles
Department of Public Works, Bureau of Engineering
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Re: Draft EIR – 6th Street Viaduct Seismic Improvement Project

Dear Mr. Stokes:

On behalf of the Los Angeles Conservancy, thank you for the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the 6th Street Viaduct Seismic Improvement Project. The Los Angeles Conservancy is the largest local historic preservation organization in the United States, with almost 7,000 members. Established in 1978, the Conservancy works to preserve and revitalize the significant architectural heritage of Los Angeles through advocacy and education.

While the Conservancy recognizes the need to upgrade the 6th Street Viaduct to meet current seismic safety standards, our goal is to ensure fair consideration of alternatives in the DEIR that minimize the proposal's potentially adverse effects and retain as much of the bridge's historic fabric and integrity as possible. After suggesting specific options in our earlier comments on the Notice of Preparation, we are disappointed that the DEIR does not include a single alternative that would retain the bridge's status as a Historic-Cultural Monument (HCM), whether through retrofit, reconstruction, or a combination thereof.

I. Historic Significance of the 6th Street Viaduct

Completed in 1933, the nearly mile-long 6th Street Viaduct is the last and grandest of the monumental river bridges, with its graceful steel arches and clean lines evoking Streamline Moderne design. Featured in countless films, television shows, and commercials, it is also the most widely recognized of Los Angeles' historic river bridges.

Unlike the city's other monumental bridges, the 6th Street Viaduct spans the Los Angeles River with two distinctive steel arches and remains a prominent landmark with its concrete columns, bent caps, girders, and abutments. It is composed of three independent structures: the reinforced concrete west portion, the central steel arch section, and the reinforced concrete east portion. The 6th Street Viaduct was determined eligible for listing

in the National Register of Historic Places in 1986 and designated a City of Los Angeles Historic-Cultural Monument No. 905 in 2008.

II. Regulatory Framework

A. California Environmental Quality Act

A key policy under the California Environmental Quality Act (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."¹ To this end, CEQA "requires public agencies to deny approval of a project with significant adverse effects when feasible alternatives or feasible mitigation measures can substantially lessen such effects."²

Courts often refer to the EIR as "the heart" of CEQA, providing decision makers with an in-depth review of projects with potentially significant environmental impacts and analyzing alternatives that would reduce or avoid those impacts.³ CEQA Guidelines require a range of alternatives to be considered in the EIR, with an emphasis on options capable of "substantially lessening" the project's significant adverse environmental effects. Because the DEIR does not include a single alternative that maintains the 6th Street Viaduct's historic status, it fails to meet this fundamental charge under CEQA.

B. AASHTO Guidelines for Historic Bridge Rehabilitation and Replacement (March 2007)

Prepared for the American Association of State Highway and Transportation Officials (AASHTO), the Historic Bridge Rehabilitation and Replacement Guidelines are intended to be used as the protocol for defining when rehabilitation of historic bridges can be considered prudent and feasible. The Historic Bridge Guidelines allow for some deviation from AASHTO standards in order to facilitate retention of historic bridges:

It is not appropriate to replace a deficient, historic bridge unless all feasible and prudent means to address the deficiencies without adversely affecting what makes the bridge historic, as well as other environmental constraints, have been fully analyzed and fairly evaluated in accordance with these guidelines.⁴

Echoing many of the concerns raised by the City of Los Angeles Cultural Heritage Commission about the proposed project, the Historic Bridge Guidelines list a variety of factors that should be taken into account when deciding between retrofit and replacement

¹ Public Resources Code §21001 (b), (c).

² *Sierra Club v. Gilroy City Council* (1990) 222 Cal. App.3d 30, 41; also see PRC §§ 21002, 21002.1.

³ *County of Inyo v. Yorty* (1973) 32 Cal.App.3d 795; *Laurel Heights Improvement Association v. Regents of the University of California* (1993) 6 Cal.4th 1112, 1123.

⁴ *Guidelines for Historic Bridge Rehabilitation and Replacement*, requested by AASHTO, Standing Committee on the Environment, March, 2007, p.A-30.

of a historic bridge, starting with the historical significance of the existing bridge. Other relevant factors and principles include:

- Determine if the project is appropriate to the setting, including whether the proposed bridge is wider than the approach roadway and there are no plans to improve shoulders.⁵
- In cases where the arch alone makes the bridge historic, it must be determined whether the bridge can be widened without an adverse effect (i.e. cantilevered deck section, elimination of sidewalks, etc.).
- A bridge classified as functionally obsolete because it does not meet current guidelines should not automatically be considered unsafe; consider whether a design exception will result in maintaining the historic bridge and meeting the project goals.

The DEIR should clearly identify all AASHTO standards and guidelines pertaining to historic bridge projects, including the Historic Bridge Rehabilitation and Replacement Guidelines, and take advantage of their inherent flexibility to develop alternatives that reduce or avoid significant adverse impacts on historic resources to the maximum extent possible.

C. Section 106, National Historic Preservation Act

The project will be also subject to full Section 106 review, in consultation with the City of Los Angeles Cultural Heritage Commission, Los Angeles Conservancy, State Historic Preservation Officer, Caltrans and FHWA. To ensure meaningful participation by the consulting parties, Section 106 review should inform preparation of the DEIR, the development of alternatives, and appropriate mitigation measures. As noted above, despite extensive consultation by the Bureau of Engineering with the Conservancy and Cultural Heritage Commission, among others, the DEIR does not include a single alternative that significantly reduces or avoids major impacts on historic resources.

III. The DEIR does not include any alternatives that retain the 6th Street Viaduct's Historic-Cultural Monument status

A. The DEIR should bring forward a partial retrofit/partial replacement alternative for detailed evaluation

Despite repeated requests by the Conservancy, both in our NOP comments and in meetings with the Bureau of Engineering, the DEIR does not adequately consider a combined retrofit/replacement alternative that prioritizes retention of the iconic center section spanning the Los Angeles River. Undoubtedly, the viaduct's twin steel arches are its most

⁵ At the Cultural Heritage Commission informational presentation on DEIR on July 30, 2009, Commissioner Richard Barron commented that "the bridge width is completely unacceptable and that there is no way that the existing bridge width, not necessarily the bridge itself but the bridge width, can be maintained because I know in looking at your report that once the bridge hits Whittier [Boulevard] you go back down to...a 54 foot dimension."

recognizable, beloved, and character-defining features. Although the viaduct stretches over 3,500 feet, the arched section comprises only a small portion of the overall length at less than 400 feet. While Alkali-Silica Reaction (ASR) has deteriorated the bridge's concrete, the Bureau of Engineering has acknowledged that ASR does not impact the bridge's structural steel. Accordingly, the EIR should be revised to include detailed consideration of an alternative that incorporates steel and other decorative elements into a partially reconstructed 6th Street Viaduct.

Section 2.4.1.8 of the DEIR, "Other Retrofit Schemes Considered but Eliminated from Further Discussion," describes a similar partial retrofit/partial replacement alternative that, inexplicably, was not brought forward for thorough consideration in the EIR.⁶ The "**Replacement with Historic Replica (Modified Retrofit)**" alternative would retain the viaduct's steel arches as non-structural elements while reconstructing other features:

Under this scheme, the new structure would be constructed on the same footprint of the existing viaduct and retain the same vertical profile while making adjustment for current code requirements. All of the viaduct features would be replicated to the maximum extent feasible consistent with arriving at a roadway design that meets current AASHTO standards.⁷

Among other benefits, this option would eliminate the ASR problem, provide a life expectancy of 75 years, and sufficiently widen the roadway to remove the structure from the FHWA Eligible Bridge List. Despite its apparent promise, no further analysis of this alternative is provided in the DEIR. Besides noting that "the new structure would not have exactly the same visual appearance or historical aesthetics of the existing bridge," the DEIR provides no explanation as to why this alternative was eliminated from detailed consideration.

A similar approach was successfully executed at the Colorado Street Bridge in Pasadena (1913), which was substantially reconstructed in the early 1990s to correct major seismic deficiencies, but nonetheless retained its listing in the National Register. Although not precipitated by ASR, the Colorado Street Bridge project necessitated removal and reconstruction of the entire bridge deck and much of the substructure. Strict aesthetic guidelines were developed in consultation with the State Office of Historic Preservation to ensure compliance with Section 106 requirements, including maximum retention of character-defining features, faithful reconstruction of elements that were removed, and the addition of compatible new features needed to meet current FHWA/AASHTO guidelines. The aesthetic guidelines are reflected in a new railing separating traffic lanes from the sidewalk (required to meet FHWA standards), preservation of pedestrian refuge bays,

⁶ The DEIR also includes a "Substructure Replacement" option that would replace all substructure elements for the length of the entire structure, the concrete barrier, and the existing luminaires with light standards replicating the 1930s design. However, because this alternative would not replace ASR-afflicted sections of the bridge deck, it is rejected in the DEIR because "the superstructure would continue to be vulnerable to earthquakes" and "closure...would likely be required due to superstructure damage."

⁷ DEIR, p.2-39.

replication of the original concrete color and form-board finish, and reconstruction of the ornamental urn balustrade and pendant globe lights.⁸


The DEIR should further evaluate and refine the “**Replacement with Historic Replica (Modified Retrofit)**,” including a detailed analysis of historic elements that can be incorporated into the reconstructed span, whether it can be accomplished in compliance with the *Secretary of the Interior’s Standards for Reconstruction and/or Rehabilitation*, and information on its cost and technical feasibility.

B. The DEIR should include a full replication/reconstruction alternative that complies with the *Secretary of the Interior’s Standards for Reconstruction*

As noted in comments by the Cultural Heritage Commission, the DEIR evaluates only one alternative that would loosely replicate portions of the center span over the Los Angeles River, with several existing character-defining features lost in translation. The “**Main Span Replication**” alternative is not only much wider than the existing bridge, but fails to accurately re-create several essential details, including the bridge railing system, the two main center pylons, original light fixtures, and the two iconic double-arched steel arches. Although this “replication” alternative would construct something akin to the bridge’s center piers that were removed in the 1950s, the proposed design does not strictly adhere to the original design.

As with the Colorado Street Bridge project, strict design guidelines should be developed in consultation with the State Office of Historic Preservation and the city’s Office of Historic Resources to ensure maximum retention and faithful re-creation of historic bridge elements in retrofit and/or reconstruction alternatives. The DEIR should include a full replication/reconstruction alternative that follows the *Secretary of the Interior’s Standards for Reconstruction*, based on original architectural plans and archival materials, such that the bridge’s Historic-Cultural Monument designation is maintained.

Thank you for the opportunity to comment on the Draft EIR for the 6th Street Viaduct Seismic Improvement Project. Please don’t hesitate to contact me at (213) 430-4203 or mbuhler@laconservancy.org should you have any questions.

Sincerely,

Mike Buhler
Director of Advocacy

cc: Wayne Donaldson, FAIA, State Historic Preservation Officer
Ken Bernstein, Manager, City of Los Angeles, Office of Historic Resources

⁸ Also in Pasadena, local and federal funds will be used to retrofit and rehabilitate the National Register-listed La Loma Bridge (1914), also known as “little sister of the Colorado Street Bridge.” Similar to the 6th Street Viaduct Seismic Improvement Project, the La Loma Bridge Project will correct spalling, falling concrete, and other seismic deficiencies without adding lanes, but with minimal widening of the existing bridge. The La Loma Bridge will be widened by four feet, including two standard five-foot-wide sidewalks. Construction is expected to begin in late 2010.