LOS ANGELES CONSERVANCY

April 28, 2010

Submitted electronically
Linda Moore, Environmental Supervisor
Bridge Improvement Program
Bureau of Engineering, City of Los Angeles
221 N. Figueroa Street, Suite 350
Los Angeles, California 90012
Email: Linda.Moore@lacity.org

Re: Draft EIR – North Spring Street Viaduct Widening and Rehabilitation Project

Dear Ms. Moore:

On behalf of the Los Angeles Conservancy, thank you for the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the "North Spring Street Viaduct Widening and Rehabilitation Project." The Los Angeles Conservancy is the largest local historic preservation organization in the United States, with over 6,000 members. Established in 1978, the Conservancy works to preserve and revitalize the significant architectural heritage of Los Angeles through advocacy and education. Consistent with the mandate under the California Environmental Quality Act, the Conservancy's goal is to ensure fair consideration of potentially feasible alternatives in the EIR that retain the bridge's eligibility as a historic resource. Despite suggesting specific options in our comments on the Notice of Preparation, we are disappointed that the DEIR does not bring forward any potentially feasible alternatives that maintain the bridge's status as a City of Los Angeles Historic-Cultural Monument.

I. Historical significance of the North Spring Street Viaduct

Construction on the North Spring Street Viaduct began in 1927, seventeen years after the completion of the adjacent North Main Street Bridge (HCM #901) and North Broadway Bridge (HCM #907). Designed by John C. Shaw, the crossing was built to relieve traffic along the North Broadway Bridge. Its design was intended to complement the classical motif of these two earlier works, linking the three spans as a thematic sub-group that

connects Lincoln Heights to downtown Los Angeles.[1] Completed in 1929, the reinforced concrete viaduct rests on three large vertical piers forming two elegant arch spans. The deck features a sculpted concrete railing with incised rounded arches between decorative lamp posts, each topped by an octagonal-shaped lantern. In 1939 the bridge was widened with the removal of the southern sidewalk, and in 1992, along with retrofitting, extensive repairs where made to the viaduct's distinctive balusters, electroliers, and railings.

The North Spring Street Bridge has been determined eligible for listing in the National Register of Historic Places and was designated as City of Los Angeles Historic-Cultural Monument (HCM) #900 in 2008.

II. The accelerated timeline for final project approval limits opportunities for meaningful public comment

At the outset, we would like to express our dismay over the drastically accelerated schedule for final approval of the proposed project, with the Bureau of Engineering (BOE) seeking to respond to comments on the DEIR, circulate the Final EIR, and bring the project to the City Council for a final vote by June 2010. After nearly four years of inaction – with the Notice of Preparation having been issued in August 2006 – the BOE is now pushing to wrap up the most critical phases of the environmental review process in less than three months.[2]

In reviewing the North Spring Street Viaduct project on April 15, 2010, several members of the city's Cultural Heritage Commission expressed frustration about the truncated timeline and the resulting disenfranchisement of the commission. President Richard Barron lamented the commission's perfunctory role in the project review process:

> [T]his thing is all of a sudden a swell that's going to hit the beach in two months. And, you know, what recourse do we have? Again, you've got us stuck in a corner and we're really not able to deal with it. I'm just really saddened by this as a person that has this position as a commissioner on this commission that is supposed to look after these cultural elements in a way to protect them and I feel that we have our hands tied behind our backs and we're watching the guillotine smash it. It's sad, it's sad.[3]

In addition to limiting opportunities for meaningful public comment, the hastened project schedule has resulted in significant errors and omissions in the DEIR. For instance, despite the BOE's participation in the nomination process, the DEIR fails to acknowledge the bridge's local monument status and, consequently, does not evaluate the project's

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[1] As noted in comments submitted by the Cultural Heritage Commission, the DEIR's Cumulative Impacts section fails to evaluate the project's impacts on this thematic sub-grouping. Letter from Richard Barron, President, Cultural Heritage Commission, to Linda Moore, Environmental Supervisor, Bridge Improvement Program, Bureau of Engineering, City of Los Angeles, April 15, 2010.

[2] In comparison, the DEIR for the Sixth Street Viaduct Seismic Improvement Project was issued in June 2009, with the Final EIR yet to be released nearly a year later.

[3] Cultural Heritage Commission, Item 4, North Spring Street Bridge, No. 53C0859, HCM #900, April 15, 2010; unofficial partial transcript attached as Attachment A.

potential impacts on HCM eligibility. Such oversights cast serious doubt on the BOE's willingness to thoroughly consider less harmful preservation alternatives to the proposed project.

III. 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."[4] 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."[5]

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.[6] The 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. By failing to evaluate a single potentially feasible alternative that would maintain the bridge's historic status, the DEIR for the North Spring Street Viaduct project fails to meet this fundamental charge under CEQA.[7]

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 flexibility in and deviation from AASHTO standards 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,

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[4] Public Resources Code §21001 (b), (c).

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

[6] *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.

[7] "Under all build alternatives for this project, the proposed undertaking would have an adverse effect on the North Spring Street Viaduct by comprimising [sic] the integrity of the historic resource." (DEIR, Executive Summary, at p.iv.) Although Build Alternative 1 (seismic retrofit) would likely retain the bridge's HCM status, it makes no attempt to address other project objectives, such as widening lane width or providing pedestrian and bicycle access. Consequently, this option is likely to be rejected as infeasible by failing to meet key project objectives.

have been fully analyzed and fairly evaluated in accordance with these guidelines.[8]

Issued after the start of CEQA review for the proposed project, the Historic Bridge Guidelines list a variety of factors that should be taken into account when deciding between retrofit and replacement 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.[9]
- 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.[10]

The EIR 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, including construction of a stand-alone pedestrian-cyclist crossing alongside the historic span.

IV. Project Description, Purpose and Need

It is misleading and inaccurate to describe the proposed undertaking as a "rehabilitation" project. The Secretary of the Interior's Standards for Rehabilitation define "rehabilitation" as "the act or process of returning a property to a state of utility through repair or alteration which makes possible an efficient contemporary use while preserving those portions or features of the property which are significant to its historical, architectural, and cultural values."[11] The proposed project would remove virtually all visible historic fabric on the North Spring Street Viaduct in order to widen the bridge 20 feet on each side – without adding any new traffic lanes. In addition to removing historic fabric, the scale and dimensions of the historic span will be dramatically altered by nearly doubling its current width. A legitimate rehabilitation project cannot be predicated on the removal of all visible historic fabric. Moreover, the proposed replication of the bridge's original features in a new, widened span does not mitigate their loss.

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

[9] As noted in comments submitted by the Cultural Heritage Commission, "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." Letter from Cultural Heritage Commission to Bureau of Engineering, April 15, 2010.

[10] "The need for the proposed project is a result of an inspection of the North Spring Street Viaduct conducted by the City and Caltrans in July 2000 using FHWA's bridge inspection criteria, which determined the Viaduct to have a sufficiency rating (SR) of 74.2 [out of minimum 80.0 points], due to the following issues: Inadequate lane width; lack of shoulders; loose cable restrainers; inadequate vertical railroad clearance; and deterioration of pavement and sidewalks on Aurora Street." (DEIR at p.1-2.)

[11] *Secretary of the Interior's Standards for Rehabilitation* (Department of Interior regulations, 36 CFR 67).

Unlike the Sixth Street Viaduct Seismic Improvement Project, where seismic deficiencies have been well documented, the need for retrofitting the North Spring Street Viaduct is unclear given extensive seismic repairs completed in 1992. The Historic American Engineering (HAER) report prepared by the National Park Service and the BOE in December 2000 includes a detailed description of these improvements:

> North Spring Street Bridge was upgraded [in 1992] for a seismic safety event by adding shear keys and replacing the rocker bearings with elastomeric bearing pads. Cable restrainers were used to prevent displacement of girders on the pads. Concrete pads closing the expansion joints installed at the east and west arch abutments and pier 3 made the deck a continuous load-bearing structural element.[12]

The attached HAER rendering (Attachment B) depicts the extensive retrofit treatment implemented at the time.

Although the Conservancy recognizes enhanced pedestrian and bicycle access as a legitimate goal, there are less harmful alternatives that would accomplish this objective without destroying the historical integrity of the North Spring Street Viaduct, as detailed more fully below.

V. The DEIR is inadequate for failing to include a single viable preservation alternative that maintains the bridge's status as a City of Los Angeles Historic-Cultural Monument

Because widening the North Spring Street Viaduct will likely destroy its eligibility as a historic resource, the Conservancy favors an alternative that would retrofit the existing span, if needed, and construct a stand-alone pedestrian-cyclist bridge alongside it. Under this option, we propose that the existing sidewalk be removed to enable widening the lanes to the maximum extent possible within the existing bridge deck.[13]

The BOE is currently favoring a similar approach for the Riverside-Zoo Drive Bridge, after initially proposing to widen the bridge on both sides. Like the North Spring Street Viaduct, the Riverside-Zoo Drive Bridge is not wide enough to meet current design standards for lane width and shoulder. In conjunction with Section 106 review for the Riverside-Zoo Bridge project, the Conservancy compiled a list of historic bridge projects across the country that (1) involve the construction of a new parallel pedestrian bridge next to an existing historic bridge, and (2) are funded through the federal Highway Bridge Program or using other federal funds (i.e. transportation enhancement funding). See Attachment C. At the request of the Conservancy and the city's Office of Historic Resources, the BOE developed an alternative that would provide pedestrian-cyclist access

[12] See Attachment B.

[13] As acknowledged by BOE staff at the April 15, 2010 Cultural Heritage Commission hearing, there are "four 10 foot lanes currently, and the widening proposes four 11 foot lanes." See transcript attached as Attachment A. Removing the existing four-foot sidewalk would enable the existing traffic lanes to be widened to 11 feet.

on a new parallel span, enabling lanes on the historic bridge to be widened within the existing bridge deck for vehicular traffic and thereby maintaining its historic eligibility.

This strategy could be easily adapted for the North Spring Street Viaduct, providing myriad environmental and other public benefits. Foremost, this option provides the desired pedestrian-cyclist connection with no significant adverse impacts to the historic North Spring Street Bridge. It could be designed to enable a direct pedestrian-cyclist linkage between the Los Angeles State Historic Park (Cornfields) to the west and the recently expanded city parklands on the southeast side of historic bridge, creating opportunities for coordinated public programming. Likewise, it would correct any seismic vulnerability issues specific to the viaduct and reduce "geometrical design deficiencies" by widening lanes within the existing bridge deck.

Despite the obvious benefits of a stand-alone pedestrian-cyclist crossing, the DEIR for the North Spring Street Viaduct project summarily rejects a similar option (Strategy V5) without serious consideration. Although the publicly-owned right-of-way extends out approximately 20 feet on each side of the existing bridge, the "Rejection Rationale" in the DEIR states that "construction of a stand-alone pedestrian-cyclist structure would…be difficult to connect new structure to existing street system."[14] The Conservancy has requested a copy of any studies prepared by BOE in support of this conclusion, but none have been provided to date.

VI. The Area of Potential Effects (APE) fails to adequately identify potential historic resources impacted by the proposed project

As noted by the Cultural Heritage Commission, the APE established in consultation with Caltrans and the BOE as part of Section 106 consultation excludes several buildings immediately adjacent to the North Spring Street Viaduct and others fronting North Spring Street, including: 1640 N. Spring Street (1925), 1700 N. Spring Street (1901), 1726 N. Spring Street (1920/1934), 1727 N. Spring Street (1914), and 1719 N. Spring Street (1910). Because the APE was determined based on an outdated survey prepared in 2002, the DEIR also fails to acknowledge that 1695-39 N. Spring Street – originally found to be ineligible for the National Register – has since been designated a City of Los Angeles Historic-Cultural Monument.

Thank you for the opportunity to comment on the Draft EIR for the "North Spring Street Viaduct Widening and Rehabilitation 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

[14] DEIR at p.1-15.

List of Exhibits

Attachment A: Partial Transcript, Cultural Heritage Commission, Item 4, North Spring Street Bridge, No. 53C0859, HCM #900, April 15, 2010
Attachment B: Excerpt from Los Angeles River Bridges Recording Project, Historic American Engineering Program (HAER), National Park Service and City of Los Angeles Bureau of Engineering (December 2000)
Attachment C: Examples of historic bridges with adjacent pedestrian bridges

cc: Jill Sourial, Council Deputy, River and the Environment (Council District 1)
Ken Bernstein, Manager, Office of Historic Resources
Milford Wayne Donaldson, FAIA, State Historic Preservation Officer
Jill Hupp, Section 106 Coordinator, Caltrans
Carol Legard, FHWA Liaison, Advisory Council on Historic Preservation
Shelly Backlar, Executive Director, Friends of the Los Angeles River
Anthea Hartig, Ph.D., Director, Western Office, National Trust for Historic Preservation
Elizabeth Merritt, Deputy General Counsel, National Trust for Historic Preservation
Jennifer Gates, Director of Field Services, California Preservation Foundation
Representative Xavier Becerra (31st District)
Representative Lucille Roybal-Allard (34th District)
Senator Barbara Boxer
Senator Diane Feinstein

ATTACHMENT A

Cultural Heritage Commission
Thursday, April 15, 2010, 10:00 A.M.
200 North Spring Street
Room 1010, City Hall
Los Angeles, CA 90012

Item 4: North Spring Street Bridge, No. 53C0859, HCM #900 North Spring Street, CD1

Commission discussion after close of public comments:

Commissioner Richard Barron [RB]: I guess, you know, I travel on this bridge quite frequently. Every time I come downtown I travel on that bridge as the shortcut, the non-freeway alternative for me to come to the downtown area. So I'm quite familiar with the bridge. I've actually walked on the bridge and I understand the problem with walking on the bridge. It's not a pleasant place to walk because of it. But at the same time when I look at the two photographs of the existing bridge it somehow, it's kind of, you know there are these things in Los Angeles, when Griffith Park was being nominated and people were talking about sort of the aspects of Griffith Park. There are small things in Los Angeles that make Los Angeles Los Angeles and not Orange County or some other place and these are the kinds of things and these bridges are the kinds of things. When you have a bridge that gains 40 feet of width it's no longer a Los Angeles bridge. And I understand that everyone wants the pedestrian, and the bicycle lanes and they want the greater pedestrians and I totally understand it that a huge problem from an engineering point of view from this particular neighborhood because of the geometry and the way the properties are situated and what not. I don't know if it's possible. I kind of doubt it. But at the same time, when I see the two pictures, it's an emotional reaction that's really hard to swallow. Because it's no longer a Los Angeles bridge. It no longer has that characteristic. You know people get in an airplane and go to Europe and go through all kinds of funny bridges and funny little places that they pay lots of money to do. And at some point as we slowly sort of whittle away at some of these infrastructure of Los Angeles, some of these iconic elements of Los Angeles are completely whittled away, you know, we're losing part of our identity and it really saddens me. I don't know what the answer is. I don't know how you protect these things. I guess part of it is wanting to protect these things, wanting to see that these infrastructure elements are both safe, they need to be safe. I totally agree with that, but we're losing them. Little by little by little. And pretty soon no of us will recognize this place because these things are gone. And I think there are these 17 bridges that are historic monuments and we are kind of whittling them away one by one. Little bites out of each little piece of our history. And I think it's sad. I think it's really really sad. I agree with Mike Buhler in terms of the timeline, in terms of how this thing is all of sudden a swell that's going to hit the beach in two months. And, you know, what recourse do we have? Again, you've got us stuck in a corner and we're really not able to deal with it. I'm just really saddened by this as a person that has this position as a commissioner on this

commission that is supposed to look after these cultural elements in a way to protect them and I feel like we have our hands tied behind our backs and we're watching the guillotine smash it. It's sad, it's sad.

John Wu, Bureau of Engineering staff [JW]: Can I make a quick comment? North Broadway Bridge. We didn't widen North Broadway Bridge. North Main Street, we didn't widen North Main Street, because it worked, the solution worked in those cases. We're just not here to widen the bridge because we want to widen the bridge. The North Spring Street cross section took a lot of effort to come to that conclusion. 20 feet on each side. If you break that 20 feet down, 75% is for pedestrian and bike. 10 feet out of 20 is for pedestrian, another five for bike, so only five, yes, we're adding five feet to make the bridge eligible for funding, therefore funding for the other fifteen feet. Yes, there's a give and take here. Like someone said, the pedestrian access is very important. If we don't widen the bridge, we will not get any. It's either all or nothing. We have gone to Caltrans and asked for the minimal roadway cross section that would make the funding eligible. The true cross section, the standard cross section is eight feet of shoulder. For North Spring, the proposal has zero shoulder. It's the five feet of bike lane that we're using as an integrated approach to provide the shoulder so we're thinking of all sorts of innovative ways to convince Caltrans for narrower roadway cross sections whereby we fund the project and get the other benefits. And the widening, not to mention the widening is the most effective solution for a seismic retrofit. Without touching the existing fabric. This bridge is what they call a category one. What that means is that under a major earthquake this bridge would fall down. This is a category one seismic retrofit. So, yes there's a solution of just retrofitting the bridge and not widening at all, but you would not get the pedestrian nor the wider sidewalk. Those are the tradeoffs, you know, the decisions we have to make.

RB: Commissioners, any comments? [Pause] When is the public meeting you're going to have? Where, tonight?

JW: It's 6-8 pm. Location is...Ann Street Elementary School…126 Bloom Street. It's the Ann Street Elementary School Auditorium from 6-8…We'll leave a copy behind.

Ken Bernstein, Office of Historic Resources staff [KB]: We do have a copy of the public notice if any of the commissioners…

RB: Do the bike lanes that are being put on the bridge. Do the bike lanes connect to bike lanes on both sides of the bridge?

JW: Someone mentioned it is currently not yet, but it is going to be a designated bike route because of the Riverside Bridge right now that we're building will allow the LA River Bikeway to come into downtown. It will come through Riverside Bridge, come to Avenue 19 and connect to North Spring Street, so that is the connection to downtown. There is a lot of planning process behind this. We're certainly just not putting a bike lane if one is not needed. It's five feet on each side, bike lane as proposed. It's not bike path would be a twelve foot dedicated stand alone facility.

RB: There is also an island associated with the new bridge.

JW: The reason for that is LADOT expressed and through..I brought accident records. There has been fatalities. If you have a bridge with that kind of crowd and no separation whatsoever, the head on collision makes it very dangerous from motorists. The head on collision without any buffer between the northbound and southbound traffic is in today's standards is just very dangerous.

RB: As I say, I travel on this bridge quite frequently and the, I mean the bridge, I mean the bridge in itself is not a restriction at least in my opinion, my non-traffic engineering opinion which I generally have a lot of. I should have been a traffic engineer I think. There's no restriction in terms of traffic relative to the bridge itself. The restriction is associated with general traffic patterns that are associated with Lincoln Heights. As the traffic crosses the bridge going west, there's a buildup of traffic beyond the bridge, so traffic tends to stack up on to the bridge, especially in the evening hours, in the transit going home in the evening. I'm sorry, going east, did I say west? I meant going east, going into Lincoln Heights. So the traffic tends to stack up. But it moves very quickly as it goes through there.

JW: Yes, it does. Yes it does and as I mentioned, the capacity is not changing. You have four 10 foot lanes currently, and the widening proposes four 11 foot lanes. No shoulder and the shoulder is the bike path, the bike lane and you have a nine foot median that we plan to use for aesthetic purposes like a raised hardscape median, so if you really want to look at the, down to the details, this project is really about pedestrian, bike, and aesthetics and seismic. If someone were to tell you this project is about building lots of lanes, wide lanes, freeway-like traffic, no, it is definitely not our intent here.

Commissioner Oz Scott [OS]: Did you say it's four lanes?

JW: Four lanes

OS: Five lanes there?

JW: This rendering is not quite the…as it tapers down to the next street there is a right turn lane which it currently has but on the bridge itself is four lanes.

OS: So that rendering is not…

JW: The rendering is a little bit off that solid line that you see there really shouldn't go that far up.

OS: Am I missing something. I'm looking at five lanes.

JW: This left turn lane here really goes further up. This rendering… This here really here, is there flaring here, there should be flaring here. One two. One two.This solid lane should really start here. So it's just one two.

OS: So that rendering is wrong.

JW: It's off.

OS: It's only two lanes on one side and two lanes on one side. And the rendering shows three lanes on one side.

JW: On this side of the bridge. On the other side it's very clear. It's four lanes…At the east end it has to join the existing four…there are two turn lanes. There is a turn lane here and a right turn lane here.

OS: OK, OK, so that's a right turn lane…

JW: Yes, this is a right turn lane. It's a little misleading on this…

KB: Commissioners, just a word about again the staff recommendation, the draft letter, I know you're prepared to move on it. The focus of the comments which will become the Commission's comments are first of all to ensure that this EIR process acknowledges the bridge as a Historic-Cultural Monument and we pointed out obviously that that was omitted entirely from the Draft EIR, mention that this is a Historic-Cultural Monument and to ensure that there is a full exploration of alternatives so that that monument status can remain and this retain eligibility in the end, to ensure that there is a full analysis of all of the alternatives as to whether we are losing eligibility so that the Commission when we get to the final EIR stage and the policymakers, the Board of Public Works and the City Council when they consider that EIR will have the full information as to which alternatives would retain its Historic-Cultural Monument status as well as we hope a full exploration of all alternatives that would do so. So that is there are many comments here. That is the overall thrust of the comments to ensure that you and the policymakers have that information in the end.

JW: I think it is important maybe to reiterate from this light here before you make your decision. These are 11 foot lanes. They are currently 10 foot lanes. So the widening is about providing 10 foot sidewalks on each side, five foot wide bike lane which is also serving as a shoulder so technically there is no shoulder being added for the widening. And then the separation for the collision which can also be used as an aesthetic treatment to calm the traffic. The city of Alhambra in their 710 mitigation on Fremont Avenue put in these type of median barriers as traffic calming features. So, you really have to understand the overall specifics to understand what we're trying to achieve. And to us regarding Ken's comments, this may remove the bridge from the National Register for eligibility but perhaps from a local monument it does not have to be. So though it may lose its eligibility from a National Register point of view, looking at it from the side here, this one here. This is a concern because we're sandwiching the historic fabric. In essence we're losing the

national eligibility but perhaps from a local landmark point of view the original bridge is still there and since we all agree that the standards are different, why does it have to be that the local designation is removed, maybe we can retain it.

Commissioner Glen Dake [GD] I'd be curious if Lambert had remarks about that particular image.

Lambert Giessinger, OHR staff [LG]: Well, I think we certainly do have remarks and again we looked at this specifically with the Riverside Zoo bridge at alternatives relative to what the Commission has commented on. Arriving at this as the solution is very different from the type of process that we would go through in looking at this architecturally. I mean the Secretary of the Interior Standards talk about compatibility yet differentiation. How does something tell the story over time. All we've done here is kind of pumped up and made it a bigger bridge that kind of looks like the historic bridge. From an architectural standpoint and a historic preservation review standpoint this would be wrong. We wouldn't do this, because now it's creating a false sense of history. Perhaps there's nothing wrong with the discussion that says we need to add some elements to an historic bridge, how do we achieve that. That's the conversation we need to have. Not two months before the project is necessarily finalized. Over time, as we work with other applicants we often say, well let's look at three alternatives. What are the alternatives that might retain eligibility? How do we add compatible features to this bridge? We had this discussion on Riverside, too.

JW: Yes, yes.

LG: So, again, this sort of jump from, you know, 40 feet wider and just replicate historic elements. I mean, partly, you're almost making a really good case here for how Sixth Street bridge could be replicated because you've done it already with your proposal. So I think we have to kind of start to break this apart in terms of what is the approach. Is it about kind of the design and historic preservation review process or what are the assumptions that led to well, if we just replicate all of the details we kind of make it look like the historic bridge and continue on?

JW: Lambert, I think we will work with you, your staff and look at every bridge, every bridge is unique as I mentioned. On the Riverside Zoo we can't make that one work because there was two wide sidewalks on each side, taking them out would provide plenty of space to meet the criteria and we barely met the criteria, at 80 points. We had to make 80 points or higher. But here with one narrow sidewalk on only one side, it doesn't lend itself a solution and here, because of the state park and we listened to the community, they wanted the bike lane, they wanted the wider sidewalk. That's why we have such a wide proposal. And it fits this site. You know because of the state park.

LG: Yes, but there are also different ways of widening a bridge. This is only one solution which is maybe the most obvious where you simply split it in half and make it wider as opposed to alternatives that would add those additional elements as external to the historic bridge.

JW: I think this is where it becomes very subjective. We have had that discussion on the First Street Bridge. Whether the widening should be the same structure type or maybe we should contrast it, but, you know, going back and forth with SHPO, at the end of the day it was preferred to have the same arch structure type. At least for First Street. And we see this as being similar. To have a modern structure next to the historic – some people would like that because you would contrast the old and the new.

LG: Part of this is the process of exploring those alternatives.

JW: We go through that discussion, maybe not directly with your staff, from the engineering team and Caltrans. We go through the exercise. We certainly don't do it in a vacuum.

GD: In the future, maybe we are agreeing I think, I've heard you, you are going to participate with staff on the Commission on that kind of discussion in the future.

JW: Most certainly.

GD: OK

RB: I have one further question. Was there any consideration…the current bridge is currently 45 feet in width?

JW: It's 10 foot lanes, so that's 40 feet. And then you have a 4 foot wide walkway and then the barrier. So total would be about 48 or so.

RB: And so you're essentially doubling the width of the bridge for pedestrians and bicycles?

JW: And the median.

RB: And the median. If you took out the pedestrian. If you only had pedestrians and bicycles on one side and you took out the median, your widening of the bridge would be 13 feet as opposed to 40 feet.

JW: True.

RB: Was there every any consideration of having a 13 foot widening of the bridge?

JW: No, because we always knew the state park and it's a very large park would come in and demand that type of pedestrian access on both sides. It wasn't a situation where yes we do have bridges with only walkway on one side but it wasn't considered here because of the future demand of this site.

LG: You're saying the Cornfields Park demand…

JW: Yes, yes.

LG: How would they do that?

JW: Because you have so many users who walk to the park and also right next to North Spring Street, the city just acquired the Albion site for future park so there's heavy and there's a Downey site on the east side. So on three corners of the bridge you have large parks and they have to traverse every which way. And to have sidewalk on one side just didn't make sense to us.

RB: OK, I'm exhausted. I move that we approve the letter. Do I have a second?

Commissioner Roella H. Louie [RL]: Second.

RB: Roll Call

Clerk: Commissioner Barron

RB: Yes

Clerk: Commissioner Louie

RL: Yes

Clerk: Commissioner Dake

GK: Aye

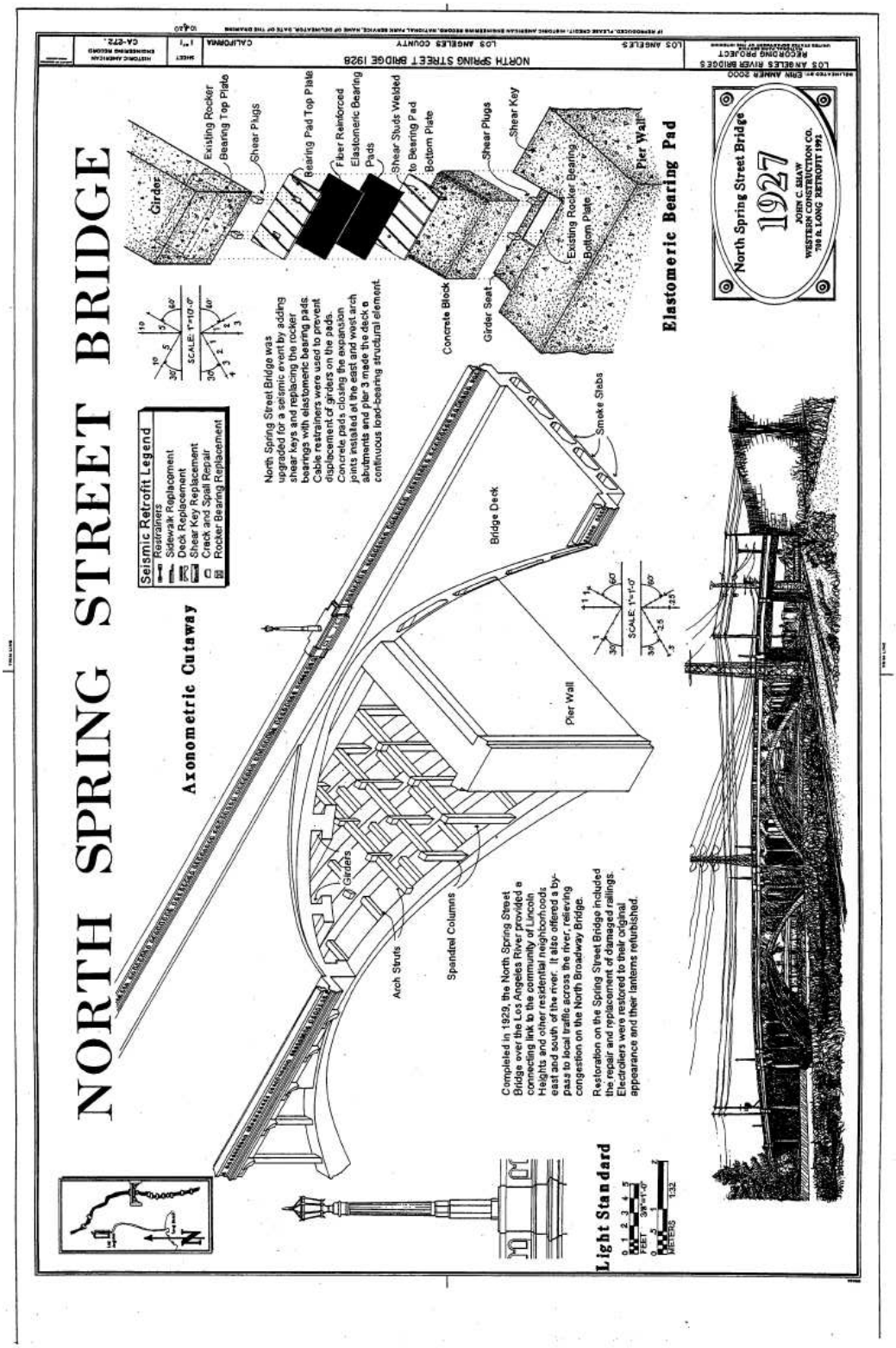
Clerk: Commissioner Scott

OS: Yes

Clerk: Motion is carried.

RB: Thank you very much. We look forward to continued communication and working with you in the future. And I hope that we haven't been too hard on you, but I think we needed to express ourselves in a way that let you know what our purpose is here. I apologize for any misspoken words to you.

ATTACHMENT B

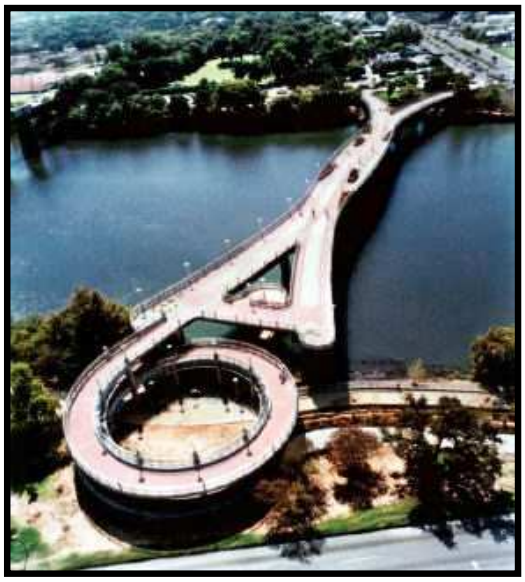


ATTACHMENT C - Examples of historic bridges with adjacent pedestrian bridges:

Using federal transportation enhancement funds, the historic **Sterling Road Bridge** was relocated from a nearby county and placed in use as a sidewalk bridge next to the existing historic **1935 M-156 Bridge** in Morenci, Michigan**.** The historic M-156 Bridge, pictured at left, originally had a sidewalk, but it had to be removed in order to widen the bridge for increased vehicular safety.

Located in Shannon County, Missouri, within the Ozark National Scenic Riverways, this narrow **1924 concrete arch bridge** (below) carries traffic while a **modern parallel bridge** carries pedestrians between recreation areas on both sides of the Current River.

The project below involved the construction of a pedestrian/bicycle bridge alongside the **historic Lamar Street Bridge** in Austin, Texas using federal transportation enhancement funds.



The historic **Ferry Street Bridge** (below left) in Eugene, Oregon was widened within the existing bridge deck, with a separate pedestrian bridge built alongside it. This project was completed in 1999 and paid for with federal funds. This $30 million project involved major improvements to the Coburg Road Corridor consisting of (1) widening of 1100-foot reinforced concrete Ferry St. Bridge Viaduct; (2) widening of the 794-foot Ferry St. Bridge Truss and concrete approaches (3) construction of 3-span 488-foot state-of-the-art suspension bridge (4) microsilica overlays for all concrete bridges; (5) seismic retrofit of all bridges; (6) two new CIP bridges; and (7) extensive illumination, landscape, and traffic signal improvements.