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Date: 6-8-11
Submitted in Trans Committee
Council File No: 11-0695
Item No.: Special 1
Deputy: [Signature]

Dear Ms. Weintraub:

On behalf of the Cultural Heritage Commission and the Office of Historic Resources, thank you for the opportunity to provide formal comments on the Environmental Impact Report for the North Spring Street Viaduct Widening and Rehabilitation Project. The comments provided here reflect the discussion held at the Cultural Heritage Commission's May 5th, 2011 meeting.

The Cultural Heritage Commission would first like to thank the staff of the Bureau of Engineering (BOE) for all their hard work in the last several months to develop additional alternatives to the proposed widening of the N. Spring Street Bridge. Formation of the Commission sub-committee also permitted greater communication and interaction with BOE staff and has resulted in more thoughtful alternatives. We believe this level of participation with the Cultural Heritage Commission and the Office of Historic Resources should be a model for all future BOE projects.

The Cultural Heritage Commission is unanimous in supporting the one-sided widening alternative versus the original preferred alternative that called for a 40 foot widening on both sides of the historic bridge. This alternative would have clearly resulted in an adverse effect and would have been detrimental to the extent that the historic bridge would have lost its Historic-Cultural Monument eligibility.

The Cultural Heritage Commission's previous comments expressing a preference for a differentiated one-sided alternative versus a replication option have led to the development of two additional alternatives: differentiated single-arch and differentiated double-arch.

Commissioner Louie expressed support for the differentiated single-arch, finding it an elegant complement or companion to the larger, more distinguished historic bridge. She felt the differentiated double-arch option was visually constricting and did not provide a distinction between old and new. She expressed her concerns that this option did not complement the North Spring Street Bridge but, in fact, competed with it.

Commissioner Scott also preferred the differentiated single-arch alternative believing that it does not obscure the character-defining features of the historic bridge. He was concerned that

the differentiated double-arch alternative appeared too much like an attempt at replication even though it was aesthetically pleasing.

Agreeing with the two other Commissioners, I believe that the double-arch alternative is not differentiated enough and may lead to confusion as to what was added and what was original. The differentiated single-arch option has a modern flair that is both contemporary and complimentary.

Commissioner Kennard was comfortable with both differentiated alternatives stressing that the addition must be differentiated between old and new, and that views to the historic bridge must be preserved.

Commission Hamacher expressed support for the differentiated double-arch option and raised concerns that the differentiated single-arch option is distracting, visually intrusive and destroys the southern viewshed of the bridge. She believed that the design was too radical and appeared more like an example of cross bracing seismic upgrading.

In summary, three of the five Commissioners expressed support for the differentiated single arch alternative, with one Commissioner being comfortable with either differentiated alternatives.

The Cultural Heritage Commission would like to review any additional study of these alternatives for compliance with the Secretary of the Interior's Standards for Rehabilitation and to evaluate whether they will still result in an adverse effect on the historic bridge. Combined with a viable mitigation package involving physical retention of character-defining features and other measures, we believe that these alternatives would result in a project that retains Historic-Cultural Monument eligibility.

Thank you again for this opportunity.

Sincerely,

RICHARD BARRON, President
Cultural Heritage Commission

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Misleading Statements By Metro and LADOT

1. The Wilshire BRT Executive Summary on page ES-2 states:

“When converted to bus lanes, the curb lanes would carry approximately 30 buses per lane per hour.”

On page ES-3, it states: “The Metro Rapid service on Wilshire Boulevard currently operates approximately every two minutes during the peak periods and approximately every 7 minutes during off peaks.”

30 buses per hour is the same as every two minutes - - NO TIME SAVINGS.

2. Page ES-2 states: “The person throughput with bus lanes (1,500) is, therefore, superior to that of mixed-flow lanes (1,056) during peak hours.” However, the 1,056 number is calculated by only counting cars in the curb lane. There are THREE mixed-flow lanes now and squeezing 3,168 persons in cars from 3 lanes into 2 lanes is obviously

a much greater negative impact than the benefit of a few minutes saved by 1,500 in buses.

3. Page ES-3 states: “This does not incorporate expected increases in bus ridership on Wilshire Boulevard after the bus lanes are implemented, which would further improve the bus lanes' person throughput.” However, LADOT’s traffic maps prove that the eastbound cars between Centinela and the 405 will NOT switch to buses because they need to get on the 405 to reach their destination.

4. The Project proposes to “Widen Wilshire Boulevard between Bonsall Avenue and Barrington Avenue to accommodate bus lanes (0.7 mile)”, without disclosing the legal and physical obstacles and impacts of narrowing the sidewalks.

5. A new eastbound lane between Barrington and Bonsall is described

as solving the congestion on Wilshire and diversion off Wilshire during the trial, with no explanation why this will not still occur between Centinela and Barrington.

6. Compared to A-2, the statement of overriding considerations do not justify the 3-4 minutes of bus time saved over the entire trip with A-1 by adding 2.3 miles of fragmented bus lanes west of Beverly Hills. Even the 3-4 minutes are misleading because no consideration was given to time lost by buses in A-1 merging out of the new lane that ends at Bonsall, and time lost because of the three Westwood exemptions.

7. The following LADOT statement assumes a mode shift that will not occur, and takes credit for the congestion caused by reduction in roadway capacity diverting cars onto residential streets.

Beyond opening day, after traffic conditions have normalized, the average mixed-flow travel times along Wilshire Boulevard during peak periods would increase from 42.80 minutes to 48.91 minutes

(total all three segments at 8.7 miles). This is an average total increase of 6.11 minutes after 10% of drivers have either shifted to transit or diverted off Wilshire Boulevard.

Also, this misleading average number is based on all three segments, both AM and PM, and east and west. And all the LADOT numbers are averages of three trips over three days, when it's obvious the average will be skewed down by including 7 - 8 AM with 8 - 9 AM, and by including 6 - 7 PM with 4 - 6 PM.

8. LADOT has not fully analyzed the impacts of fragmented bus lanes that end at Bonsall, at Galey, at Selby, and at Beverly Hills. LADOT assumes you can merge the buses into a mixed-flow lane with no ill effect. Merging the buses in will cause its own back up of traffic, negating any benefit to the buses and causing more delay for motorists. Also, just think what will happen practically; as the busses enter a bus-only lane, they can go fast and unimpeded by traffic so they can catch up to the bus in front of it at the next traffic light. And these buses can also catch up to the buses ahead of them at the next

start of mixed-flow lanes. So now you will get the buses in clumps traveling through Westwood, Beverly Hills, and beyond, instead of evenly spaced every two minutes.

Sp 1

Legal and Physical Obstacles to Narrowing the Sidewalk Between Barrington and Federal

1. The proposed width of the sidewalk would violate the City's General Plan.
2. The proposed width of the street curb lanes would violate the City's General Plan.
3. The proposed width of the sidewalk would violate the Brentwood/Palisades Community Plan.
4. The space between the bus benches and adjacent properties would violate the Americans with Disabilities Act.
5. Nine mature Ficus trees within 2 feet of the current curb would be removed.

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6. Two of the bus benches on the north side currently have only 2 feet 6 inches and 4 feet 3 inches behind the bench for pedestrians.

7. A bus shelter on the north side and 2 bus benches on the south side currently have only 5 feet 6 inches behind the bench for pedestrians.

8. Every afternoon, over 60 University High students wait at a bus bench and shelter on the south side in front of the 7-Eleven and currently spill over the sidewalk onto the street, the 7-Eleven driveway, and the 7-Eleven parking lot. Removing 2 feet of sidewalk would leave them with less than 6 feet to stand. When raised with the LADOT, their response was:

“There is also a surface parking lot, which accommodates any spillover pedestrian activity at the eastbound Metro Rapid bus stop between Barrington Avenue and Barry Avenue.”

In other words, the kids can wait in a parking lot for the bus.

9. There is a medical office building at the SW corner of Wilshire/Federal and another medical office building at the NW corner of Wilshire/Barry frequented by patients in wheelchairs and walkers.

10. Within 2 feet of the current curb, there are numerous traffic signal boxes above and below ground, high voltage street lighting boxes, fire hydrants, street sign poles, traffic signal poles, street lighting poles, and newsracks, all of which would encroach on the current pedestrian space, which is already less than called for by the City's Plans.

11. CEQA is violated because the EIR failed to study, let alone mention, any of the above impacts.