



April 18, 2018

Pierre Rivas  
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Director, Development Services Department  
City of Placerville  
Placerville, CA 95667

Dear Mr. Rivas:

The Historic Bridge Foundation is the national advocacy organization for historic bridges throughout the United States. We provide technical assistance to local groups that hope to save their historic bridges.

Friends of Clay Street contacted the Historic Bridge Foundation several weeks ago for information and advice regarding the removal of the Clay Street Bridge over Hangtown Creek.

According to our research and information provided in the *Draft Environmental Impact Report*, the bridge has a sufficiency rating of 62.6. We note from the report that the City of Placerville received permission from Caltrans Structures Local Assistance to replace the bridge despite the fact that the bridge is rated good for both the superstructure and the substructure. From information provided in the *Draft Environmental Impact Report*, we feel that more consideration should be given to finding an alternative that does not remove the bridge. As an example, there have been several projects within the US where the decks of concrete arch bridges have been widened and we believe this is a valid alternative to consider. Historic bridges are being removed at a rapid rate in the United States and it is unfortunate that a bridge with a sufficiency rating of 62.6 is slated for removal.

Although Caltrans determined that the Clay Street Bridge is not eligible for the National Register of Places at the state level, we find this somewhat shortsighted regarding Criterion C at the local level. Closed spandrel concrete arches predate open spandrels. Closed spandrel arches were not built for long as engineers soon realized that significant material could be saved and a consequent reduction of weight could be achieved by eliminating the triangular section between the deck and arch. Filled spandrel concrete arches date primarily from the earliest decades of reinforced concrete, i.e., the 1890s through the 1920s. They are not as common (then and now) as many of the standardized bridge types built during this same era, such as concrete slabs and girders. Because they are not as common, *A Context of Common Historic Bridge Types*, published by TRB in 2005, suggests that this bridge type is significant as it represent the evolution of concrete technology.

Statements in the *Draft Environmental Impact Report* seem to agree that closed spandrel concrete arches were common from the 1890s through the 1920s and became less common as techniques were

developed to create open spandrel concrete arches. The *Report* goes on to say that the Clay Street Bridge should be considered a late example of its type. This statement suggests the bridge may be significant under Criterion C at the local level when comparing information provided in the TRB report and the *Draft Environmental Impact Report*.

At the same time, we recognize that a structure must retain integrity to be considered significant. On page 4.4-10, the statement is made that “the Clay Street Bridge possesses moderate to good integrity and that the arch ring is intact, as are the barrel, spandrel walls, and railings. The abutments are in near-original condition, as are the wingwalls.” Referring back to *A Context of Common Historic Bridge Types*, it states that “To be considered significant, concrete spandrel arches should have integrity through the retention of their character-defining features, which include the arch ring, barrel, spandrel wall, railing or parapet, end posts, piers and/or abutments and wingwalls. When comparing the two statements from the two reports, we find it inconsistent that identical character-defining features are present per each report, yet one says the Clay Street Bridge does not retain integrity while the other suggests it should. The *Report* also notes “some concrete repair work may have taken place at the southern side of the bridge, though this does not detract from the bridge’s integrity.” Thus, in comparing the information provided in *A Context of Common Historic Bridge Types* and the statements provided in the *Draft Environmental Impact Report*, we believe the Clay Street Bridge may in fact retain more integrity than is suggested in the *Report* because the character-defining features are retained. We do not agree that because the bridge was built around the existing culvert this equates to a loss of integrity.

It has become apparent to the Historic Bridge Foundation that Placerville’s downtown historic area is important to the community. Bridges should be considered valued historic landmarks just like monuments, buildings or prized oak trees. In addition, an official historic district listed on the National Register is not a requirement for a historic area to provide value and a sense of place to its residents. The removal of the Clay Street Bridge, the last bridge over Hangtown Creek, adds to the historic feeling of your town that residents treasure. Please continue discussions with your residents to find a solution that protects the history of your community.

Sincerely yours,



Kitty Henderson  
Executive Director