

1. *Executive Summary*

1.1 INTRODUCTION

This Draft Environmental Impact Report (DEIR) addresses the environmental effects associated with the implementation of the proposed 109th Street Pool and Bathhouse Replacement project. The California Environmental Quality Act (CEQA) requires that local government agencies, prior to taking action on projects over which they have discretionary approval authority, consider the environmental consequences of such projects. An EIR is a public document designed to provide the public and local and State governmental agency decision makers with an analysis of potential environmental consequences to support informed decision making. This document focuses on those impacts determined to be potentially significant as discussed in the Initial Study completed for this project (see Appendix A).

This DEIR has been prepared pursuant to the requirements of CEQA and the City of Los Angeles CEQA procedures. The City of Los Angeles Department of Recreation and Parks, as the lead agency, has reviewed and revised as necessary all submitted drafts, technical studies, and reports to reflect its own independent judgment, including reliance on applicable City technical personnel from other departments and review of all technical subconsultant reports.

Data for this DEIR was obtained from on-site field observations, discussions with affected agencies, analysis of adopted plans and policies, review of available studies, reports, data and similar literature, and specialized environmental assessments (air quality, cultural resources, geological resources, and noise).



1.2 ENVIRONMENTAL PROCEDURES

This DEIR has been prepared pursuant to CEQA to assess the environmental effects associated with implementation of the proposed project, as well as anticipated future discretionary actions and approvals. The six main objectives of this document as established by CEQA are listed below:

- 1) To disclose to decision makers and the public the significant environmental effects of proposed activities.
- 2) To identify ways to avoid or reduce environmental damage.
- 3) To prevent environmental damage by requiring implementation of feasible alternatives or mitigation measures.
- 4) To disclose to the public reasons for agency approval of projects with significant environmental effects.
- 5) To foster interagency coordination in the review of projects.
- 6) To enhance public participation in the planning process.

An EIR is the most comprehensive form of environmental documentation identified in CEQA and the CEQA Guidelines and provides the information needed to assess the environmental consequences of a proposed

1. Executive Summary

project, to the extent feasible. EIRs are intended to provide an objective, factually supported, full-disclosure analysis of the environmental consequences associated with a proposed project that has the potential to result in significant, adverse environmental impacts.

An EIR is also one of various decision-making tools used by a lead agency to consider the merits and disadvantages of a project that is subject to its discretionary authority. Prior to approving a proposed project, the lead agency must consider the information contained in the EIR, determine whether the EIR was properly prepared in accordance with CEQA and the CEQA Guidelines, determine that it reflects the independent judgment of the lead agency, adopt findings concerning the project's significant environmental impacts and alternatives, and must adopt a Statement of Overriding Considerations if the proposed project would result in significant impacts that cannot be avoided.

1.2.1 EIR Format

This DEIR has been formatted as described below.

Section 1. Executive Summary: Summarizes the background and description of the proposed project, the format of this EIR, project alternatives, any critical issues remaining to be resolved, and the potential environmental impacts and mitigation measures identified for the project.

Section 2. Introduction: Describes the purpose of this EIR, background on the project, the Notice of Preparation, the use of incorporation by reference, and Final EIR certification.

Section 3. Project Description: A detailed description of the project, the objectives of the proposed project, the project area and location, approvals anticipated to be included as part of the project, the necessary environmental clearances for the project, and the intended uses of this EIR.

Section 4. Environmental Setting: A description of the physical environmental conditions in the vicinity of the project as they existed at the time the Notice of Preparation was published, from both a local and regional perspective. The environmental setting provides baseline physical conditions from which the lead agency determines the significance of environmental impacts resulting from the proposed project.

Section 5. Environmental Analysis: Provides, for each environmental parameter analyzed, a description of the thresholds used to determine if a significant impact would occur; the methodology to identify and evaluate the potential impacts of the project; the existing environmental setting; the potential adverse and beneficial effects of the project; the level of impact significance before mitigation; the mitigation measures for the proposed project; the level of significance of the adverse impacts of the project after mitigation is incorporated and the potential cumulative impacts associated with the proposed project and other existing, approved, and proposed development in the area.

Section 6. Significant Unavoidable Adverse Impacts: Describes the significant unavoidable adverse impacts of the proposed project.

Section 7. Alternatives to the Proposed Project: Describes the impacts of alternatives to the proposed project that would lessen or avoid any significant effects, including the No Project/No Development Alternative, Adaptive Reuse Alternative, Rehabilitation of WPA Bathhouse (Option 1) Alternative, and Rehabilitation of WPA Bathhouse (Option 2) Alternative.

1. Executive Summary

Section 8. Impacts Found Not to Be Significant: Briefly describes the potential impacts of the project that were determined not to be significant by the Initial Study and were therefore not discussed in detail in this EIR.

Section 9. Significant Irreversible Changes Due to the Proposed Project: Describes the significant irreversible environmental changes associated with the project.

Section 10. Growth-Inducing Impacts of the Project: Describes the ways in which the proposed project would cause increases in employment or population that could result in new physical or environmental impacts.

Section 11. Organizations and Persons Consulted: Lists the people and organizations that were contacted during the preparation of this EIR for the proposed project.

Section 12. Qualifications of Persons Preparing EIR: Lists the people who prepared this EIR for the proposed project and their qualifications.

Section 13. Bibliography: A bibliography of the technical reports and other documentation used in the preparation of this EIR for the proposed project.

Appendices. The appendices for this document (presented in PDF format on a CD attached to the front cover) contain the following supporting documents:

- Appendix A: Notice of Preparation and Initial Study for 109th Street Pool and Bathhouse Replacement Project, Distribution List
- Appendix B: Scoping Period Comments and Submissions
- Appendix C: Air Quality Calculations
- Appendix D: Historic Technical Report
- Appendix E: Archaeological Survey Report
- Appendix F: Geotechnical Engineering Report
- Appendix G: Noise Calculations
- Appendix H: Memorandum on Impacts to Historic Resources Associated with Project Alternatives



1.2.2 Type and Purpose of This DEIR

This DEIR has been prepared as a Project EIR as defined by State CEQA Guidelines (Section 15161, California Code of Regulations, Title 14, Division 6, Chapter 3). This type of EIR examines the environmental impacts of a specific development project and focuses primarily on the changes in the environment that would result from that project. The EIR shall examine all phases of the project including planning, construction, and operation.

1.3 PROJECT LOCATION

The project site is in the western and northern portions of the 109th Street Recreation Center at 1431 East 110th Street, within the community of Watts in the City and County of Los Angeles. The 109th Street Recreation Center is bounded by 109th Street on the north and 110th Street on the south.

1. Executive Summary

1.4 PROJECT SUMMARY

The City of Los Angeles Department of Recreation and Parks (LADRP) is proposing to replace the existing swimming pool and bathhouse at the 109th Street Recreation Center. The proposed project would be part of a program undertaken by the City of Los Angeles called SPLASH (Swimming Pools in Los Angeles/Swimming for Health): A City of Los Angeles Pool Replacement and Management Program. The SPLASH program evaluates the need for new pools and the conditions of existing pools; it has developed a pool program that integrates plans for maintenance, major repairs, replacements, and siting and building of new pools, with strategic funding concepts.

The existing pool and bathhouse would be demolished. A new swimming pool, bathhouse, and deck would be constructed in their place. A splash pad with spraying or shooting water would be constructed north of the swimming pool. The proposed facility would be compliant with the Americans with Disabilities Act (ADA) standards for accessible design. A parking lot would be constructed in the north portion of the 109th Street Recreation Center, and a five-foot wide ADA-compliant path would be developed to connect the parking lot to the aquatic facility. Please refer to Chapter 3, *Project Description*, for a more detailed description of the proposed project.

Reconstruction of the 109th Street aquatic facility would be completed in one phase, starting in January 2010 and ending in May 2011. The aquatic facility would be closed for the summer season of 2010, and would reopen for public use in June 2011.

1.5 SUMMARY OF PROJECT ALTERNATIVES

CEQA requires that an EIR include a discussion of reasonable project alternatives that would “feasibly attain most of the basic objectives of the project, but would avoid or substantially lessen any significant effects of the project, and evaluate the comparative merits of the alternatives” (CEQA Guidelines Section 15126.6). The following four project alternatives were identified and analyzed for relative impacts as compared to the proposed project:

- No Project/No Development Alternative
- Adaptive Reuse Alternative
- Rehabilitation of WPA Bathhouse (Option 1) Alternative
- Rehabilitation of WPA Bathhouse (Option 2) Alternative

The following presents a summary of the alternatives analyzed in the EIR. These alternatives were developed to avoid or substantially lessen the significant impacts the project could have on historical resources. Please refer to Chapter 7 of this DEIR for a complete discussion of each of the alternatives and their associated impacts.

1.5.1 No-Project/No Development Alternative

This alternative, which is required by CEQA, would leave the project site in its current condition with no improvements made to the 109th Street Recreation Center. The swimming pool and bathhouse would remain in their current condition, and the proposed parking lot and path would not be created. No changes would occur.

1.5.2 Adaptive Reuse Alternative

Under the Adaptive Reuse Alternative, the proposed pool and splash pad, parking lot, and walkway would be constructed as currently planned, and the existing bathhouse would be expanded eastward. The west, north, and south sides of the bathhouse would remain intact, but the east facade of the bathhouse would be removed to accommodate an expansion of approximately 1,900 square feet. Structural improvements would be made throughout the bathhouse to the extent necessary to bring it into compliance with the California Building Code and the Historical Building Code, as applicable. The interior of the building would be reconfigured to accommodate the required fixtures for improved plumbing and water filtration. The bathhouse under this alternative would have a similar layout as that of the existing facility, in that each end of the building would continue to provide separate changing areas and restrooms for each sex. The entrance into the building would remain on the east side of the bathhouse and would embody a similar facade as that of the existing building. This alternative would bring the project to current standards under the applicable health and plumbing codes.

1.5.3 Rehabilitation of WPA Bathhouse (Option 1) Alternative

Under the Rehabilitation of WPA Bathhouse (Option 1) Alternative, the pool and splash pad, parking lot, and walkway would be constructed as currently proposed. The bathhouse would be retained *in situ*, and the character-defining features of the bathhouse would be left intact; none of the exterior walls would be removed. Structural improvements would be made throughout the bathhouse to the extent necessary to bring it into compliance with the California Building Code and Historical Building Code, as applicable. This alternative would develop an outdoor unisex changing area in the northern portion of the project site, north of the proposed splash pad. However, in order to accommodate the required number of stalls and fixtures, the changing area would encroach into the existing playground, north of the project site. The former boys' changing room would be converted to an equipment/filter room. The former girls' changing room would be left in its current condition and would function as a corridor between the eastern entrance of the bathhouse and the outdoor changing area and pool. In order to provide adequate access and circulation around the pool, the pool and pool deck would be moved westward into the existing storm drain easement that runs within the western portion of the project site.



1.5.4 Rehabilitation of WPA Bathhouse (Option 2) Alternative

The design of the Rehabilitation of the WPA Bathhouse (Option 2) Alternative would result in the removal of a portion of the west wall of the bathhouse in order to provide a semi-open air, unisex changing area in the former girls changing room. The roof of the bathhouse would remain intact. Structural improvements would be made throughout the bathhouse to the extent necessary to bring it into compliance with the California Building Code and the Historical Building Code, as applicable. Unlike Option 1, the former girls' changing room would be fully utilized; it would accommodate a portion of the required stalls and fixtures. The remaining stalls and fixtures would be developed north of the splash pad on the north side of the project site. This alternative would allow the entire project's program and development to occur within the confines of the project site, and would not affect the existing playground north of the site. Similar to Option 1, the former boys' changing room would be converted into an equipment/filter room, and the pool deck would encroach into the storm drain easement to the west in order to provide adequate circulation for foot-traffic around the pool. The character-defining features of the bathhouse, including the north, east, and south facades, would remain intact, and access would continue to be provided from the public-facing east facade. Under this alternative, the pool and splash pad, parking lot, and walkway would be constructed as originally proposed. This alternative would meet program goals, provide the needed number of fixtures for the size of the proposed pool, and upgrade the plumbing and water filtration to meet current standards.

1. Executive Summary

1.6 ISSUES TO BE RESOLVED

Section 15123(b)(3) of the CEQA Guidelines requires that an EIR contain issues to be resolved, including the choice among alternatives and whether or how to mitigate significant impacts. With regard to the proposed project, the major issues to be resolved include decisions by the lead agency as to:

1. Whether this DEIR adequately describes the environmental impacts of the project.
2. Whether the benefits of the project override those environmental impacts which cannot be feasibly avoided or mitigated to a level of insignificance.
3. Whether the identified goals, policies, or mitigation measures should be adopted or modified.
4. Whether there are other mitigation measures that should be applied to the project besides the mitigation measures identified in the DEIR.
5. Whether there are any alternatives to the project that would substantially lessen any of the significant impacts of the proposed project and achieve most of the basic project objectives.

1.7 AREAS OF CONTROVERSY

There are no specific areas of known controversy concerning the proposed project. This DEIR has taken into consideration the comments received from the public, various agencies, and jurisdictions in response to the Notice of Preparation. Written responses to the Notice of Preparation and Initial Study are contained in Appendix A of this document.

1.8 SUMMARY OF ENVIRONMENTAL IMPACTS, MITIGATION MEASURES, AND LEVELS OF SIGNIFICANCE AFTER MITIGATION

Table 1-1 summarizes the conclusions of the environmental analysis contained in this EIR. Impacts are identified as significant or less than significant, and for all significant impacts, mitigation measures are identified. The level of significance after imposition of the mitigation measures is also presented.

**Table 1-1
Summary of Environmental Impacts, Mitigation Measures and Levels of Significance After Mitigation**

| <i>Environmental Impact</i> | <i>Level of Significance Before Mitigation</i> | <i>Mitigation Measures</i> | <i>Level of Significance After Mitigation</i> |
|--|--|------------------------------|---|
| 5.1 AESTHETICS | | | |
| Impact 5.1-1: The proposed project would alter the historical visual character of the site. | Potentially Significant | See Mitigation Measure 5.3-3 | Significant, Adverse, and Unavoidable |
| Impact 5.1-2: The proposed project would not generate additional light and glare. | Less Than Significant | N/A | Less Than Significant |
| 5.2 AIR QUALITY | | | |
| Impact 5.2-1: Construction activities would not generate short-term emissions that exceed the South Coast Air Quality Management District's (SCAQMD) regional threshold criteria or significantly contribute to the nonattainment designations of the South Coast Air Basin (SoCAB). | Less Than Significant | N/A | Less Than Significant |
| Impact 5.2-2: Long-term operation of the project would not generate additional mobile- or stationary-source emissions that would exceed the SCAQMD's regional threshold criteria or significantly contribute to the nonattainment designations of the SoCAB. | Less Than Significant | N/A | Less Than Significant |
| Impact 5.2-3: Construction activities would not expose sensitive receptors in the vicinity of the project to substantial pollutant concentrations. | Less Than Significant | N/A | Less Than Significant |

1. Executive Summary

**Table 1-1
Summary of Environmental Impacts, Mitigation Measures and Levels of Significance After Mitigation**

| <i>Environmental Impact</i> | <i>Level of Significance Before Mitigation</i> | <i>Mitigation Measures</i> | <i>Level of Significance After Mitigation</i> |
|---|--|---|---|
| 5.3 CULTURAL RESOURCES | | | |
| Impact 5.3-1: Development of the project would impact an historical resource that is eligible for listing in the California Register of Historical Resources. | Potentially Significant | 5.3-1 The proposed design and construction shall be compatible with historical resources on the site and in the vicinity (e.g., mass, height, materials, setback, retention of mature landscaping). 5.3-2 The project sponsor and/or City of Los Angeles Department of Recreation and Parks shall relocate the historical resource or offer it for relocation by another individual or organization (provided that eligibility will be maintained following the relocation). 5.3-3 The project sponsor and/or City of Los Angeles Department of Recreation and Parks shall undertake documentation according to the requirements of the Historic American Building Survey (HABS) such as large format photography, measured drawings and written narrative. Copies of the documentation shall be made available to the Los Angeles Public Library (LAPL) and local preservation organizations and historical societies. 5.3-4 The project sponsor and/or City of Los Angeles Department of Recreation and Parks shall allow local preservation organizations and historical societies to document the resource and/or remove significant historic elements for archives. | Significant, Adverse, and Unavoidable |
| Impact 5.3-2: Development of the project would not impact archaeological resources. | Less Than Significant | N/A | Less Than Significant |
| 5.4 GEOLOGY AND SOILS | | | |
| Impact 5.4-1: Project structures could be subject to adverse effects associated with liquefaction. | Potentially Significant | 5.4-1 All grading operations shall be conducted in conformance with the applicable City of Los Angeles Building Code, the most recent version of the California Building Code and/or Uniform Building Code for Seismic Zone 4 applicable at the time of grading, and consistent with the recommendations included in the <i>Geotechnical Engineering Report, 109th Street Pool & Bathhouse Replacement</i> , City of Los Angeles Department of Public Works/Geotechnical Engineering Division, February 26, 2007, as well as consistent with any subsequent geotechnical investigations completed for the proposed project, which has been approved by the City. | Less Than Significant |
| Impact 5.4-2: The proposed structure could be susceptible to some differential foundation settlement as a result of a significant earthquake on a nearby fault. | Potentially Significant | See Mitigation Measure 5.4-1. | Less Than Significant |

**Table 1-1
Summary of Environmental Impacts, Mitigation Measures and Levels of Significance After Mitigation**

| <i>Environmental Impact</i> | <i>Level of Significance Before Mitigation</i> | <i>Mitigation Measures</i> | <i>Level of Significance After Mitigation</i> |
|---|--|--|---|
| Impact 5.4-3: Soil conditions would not result in risks to life or property. | Less Than Significant | N/A | Less Than Significant |
| 5.5 NOISE | | | |
| Impact 5.5-1 Project implementation would result in long-term operation-related noise that would not exceed local standards. | Less Than Significant | N/A | Less Than Significant |
| Impact 5.5-2: Construction of the project would create short-term groundborne vibration and groundborne noise at nearby residential structures. | Potentially Significant | No mitigation measures are available to reduce heavy construction equipment from causing perceptible levels of vibration at nearby residences in the vicinity of the project. | Significant, Adverse, and Unavoidable |
| Impact 5.5-3: Construction activities would result in temporary noise increases in the vicinity of the proposed project. | Potentially Significant | 5.5-1 The Construction Contractor shall locate all stationary noise sources (e.g., generators, compressors, staging areas) as far from noise-sensitive receptors as feasible, such as in the northeast section of the main project site to minimize the noise impacts of these sources. 5.5-2 The Construction Contractor shall minimize the noise levels from operation of heavy construction equipment by fitting that construction equipment with properly operating mufflers, air intake silencers, and engine shrouds to a level of effectiveness as originally equipped by the manufacturer. 5.5-3 The Construction Contractor shall minimize the noise impacts from operation of heavy construction equipment by installing, under the direction of a certified acoustical engineer, temporary sound blankets a minimum of 8 feet tall with a minimum Sound Transmission Class (STC) rating of 18 or higher at the boundary of the pool and bathhouse construction area and off-street parking construction area. | Significant, Adverse, and Unavoidable |
| 5.6 RECREATION | | | |
| Impact 5.6-1: The proposed project would reduce the amount of useable park space. | Less Than Significant | N/A | Less Than Significant |
| Impact 5.6-2: The proposed project would temporarily increase the use of nearby recreational facilities. | Less Than Significant | N/A | Less Than Significant |

1. Executive Summary

This page intentionally left blank.