

5.3 CULTURAL RESOURCES

Cultural resources include places, objects, structures, and settlements that reflect group or individual religious, archaeological, architectural, or paleontological activities. Such resources provide information on scientific progress, environmental adaptations, group ideology, or other human advancements. This section of the Draft Environmental Impact Report (DEIR) evaluates the potential for implementation of the 109th Street Pool and Bathhouse Replacement project to impact cultural resources. The analysis in this section is based, in part, upon the following information:

- *Technical Report, 109th Street Pool and Bathhouse*, Jones & Stokes, June 2007
- *Archaeological Survey Report for the 109th Street Pool and Bathhouse Replacement Project, Los Angeles County, CA*, Jones & Stokes, June 2007
- *109th Street Pool and Bathhouse Renovation/Expansion Project*, ICF Jones & Stokes, July 8 2008

Complete copies of these studies are included Appendices D and E, respectively, of this Draft EIR.

5.3.1 Environmental Setting

The proposed project is at the 109th Street Recreation Center. The park contains the subject 1939 pool and bathhouse, a 1950 recreation center, ball fields, and two tennis courts. The area surrounding the recreation center is domestically scaled in a low-rise residential neighborhood of primarily small, one-story single-family homes with a few small apartment buildings and one-story homes.

Historical Context

The 109th Street aquatic facility is associated with the building program of the Works Progress Administration (WPA) and represents an era of policies and social movements that influenced the construction of recreational facilities in Los Angeles in the 1930s, including the Parks and Playgrounds Movement, early civic moves toward racial equity, and an attempt to assuage the impacts of the Great Depression between 1929 and 1939.

Parks and Playgrounds Movement

In 1889, almost half a century after the city was founded, the Los Angeles City Council established the Department of Parks. The decline of a healthy economy, a higher standard of living, and a more urbanized workforce led to the need for recreation. The earliest Los Angeles City parks were created for the passive enjoyment of the natural and designed landscapes. These restorative environments were not necessarily intended as playgrounds and therefore did not provide for more active and athletic recreational activities.

By 1904, spurred by the progressive thinking of the Parks and Playgrounds Movement, the City of Los Angeles established a separate Playground Department. The City's move echoed national trends, which called for the creation of distinct places for play and of new "active" recreational facilities in public parks. In particular, reformers urged municipal governments to construct playgrounds in locations physically separated from the perceived dangers of the urban environment, where children could play under supervised, controlled conditions.

Proponents believed that such supervised play improved a child's mental, moral, and physical well being, and aided them in becoming responsible, well-adjusted citizens, steering them away from juvenile



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delinquency. For adults, organized recreation was seen as having similar benefits. Contemporaries believed that the psychological benefits of disciplined health and exercise led to greater happiness among workers and, especially among immigrants, provided a means to more quickly enter mainstream American culture. Improved production in the workplace, increased buying power, and a stronger local economy all were perceived benefits.

Throughout the 'teens and the early 1920s, the popularity and attendance of recreation created new demands and opportunities for municipal services. In 1925, the Playground Department became the Playground and Recreation Department, whose mission was "to organize, promote, conduct, and supervise recreation activities for people of all ages," and to assume administrative responsibility for all City pools, streamlining their operation and setting consistent standards for facilities earlier operated by different departments. In 1947, the Department of Parks and the Department of Playground and Recreation merged to become the Department of Recreation and Parks.

Under the supervision of the Superintendent of Parks from 1910 to 1936, the City of Los Angeles demonstrated a heightened interest in the construction and improvement of parks and recreation facilities throughout the early 20th century. Many of the City's existing parks were established in this period, and the Department of Playgrounds and Recreation constructed a large number of new recreation facilities throughout the City. Recreation and physical activity, always popular in the southern California climate, became well established as a municipal responsibility for civic enjoyment. Proponents viewed it as an accepted function and no longer as a means solely for social reform.

This new emphasis was reflected in financial support. Until 1925, both the Department of Parks and the Department of Playgrounds and Recreation relied on allocations from the City's general fund for ongoing maintenance and new projects. A new City Charter in 1925 changed this by establishing a separate department funded by new tax assessments that allowed a more aggressive approach to public improvements. During the 1930s, federal funding provided substantial support for the City's parks and playgrounds in the form of unemployment relief bonds, and supplemented by local funds. In 1931, for example, the Los Angeles City Council allocated \$2 million in bond funds to improve existing parks and to pay for the construction of many new recreation facilities throughout the City.

History of Aquatics in the City of Los Angeles

The earliest artificial pools in Los Angeles, such as the Los Angeles Natatorium, which opened in 1888, were private and in many cases exclusive and widely scattered. The first suggestion of incorporating public aquatics into the City's Department of Playgrounds and Recreation appeared in 1912. The department asked for \$50,000 to build a bathhouse and plunge. The first pools were a series of wading pools no more than a foot deep that were constructed at Echo Park, Violet Street, and Slauson Playgrounds. In 1914 the City acquired its first real swimming pool, the Bethlehem Baths, operated by the Bethlehem Institutional Church and renamed Vignes Municipal Bathhouse and Natatorium by the City.

The Exposition Pools in Exposition Park, were built in 1918 (later demolished to construct the Swim Stadium for the 1932 Olympics). By 1926, the City operated 11 pools, 4 of them at campsites. It was one of only two cities in the US that had a separate swimming pool, beach, and bathhouse division within its community recreation administration.

A \$1.5 million bond issue was passed in 1923 that funded the construction of three new pools, one in Eagle Rock, one in downtown Los Angeles, and the Griffith Park Pool on Riverside Drive in Griffith Park. Completed in 1927 at 50 feet wide by 225 feet long, and serviced by a bathhouse designed in the Spanish Colonial Revival style, the Griffith Park Pool was the Department's largest and most impressive public pool. With the

exception of minor remodeling of the pool, the facility as a whole, including the bathhouse retains a high level of integrity. It is still operating, very popular, and houses the offices of the City's Aquatics Division.

The Griffith Park Pool also boasted an innovation designed to accommodate more patrons with little swimming experience. The pool's shallow-deep-shallow configuration was the first of its kind. Originally intended to separate the sexes, it eventually allowed pools to be set up for multiple programming and for a larger portion of the pool to be devoted to less advanced swimmers. Many of the other pools built in the 1930s, including the Harvard and 109th Street pools, followed this model.

Civic Moves Toward Racial Equity

The 109th Street Pool and Bathhouse is in the community of Watts, about seven miles south of downtown Los Angeles. In 1902, the Pacific Electric Company completed a depot in Watts, and the community rapidly grew thereafter. In 1925, whites in the community successfully petitioned the Los Angeles City Council to annex the city in hopes of blocking black mayoral control, joining other communities or cities that augmented the City of Los Angeles' territory throughout the 1920s and 1930s.

Watts initially had a white majority population, but quickly became more diverse as the city continued to grow through the 1930s. As late as 1940, the population of Watts was 50 percent white or Mexican American, 35 percent black, 13 percent Mexican immigrants, and 1.5 percent Asian. However, that multiracial character of neighborhoods and schools did not extend to public space. In many parks, for example, such as the Centinela Park in the then all-white suburb of Inglewood, less than 10 miles away, blacks were not allowed in the pool. At the beach next to the popular Santa Monica amusement park, blacks were welcomed as patrons but confined to a "small patch of sand away from white beachgoers." In contrast, Central Playgrounds, near Central Avenue, and Lincoln Park (also known as East Los Angeles Park, Eastside Park, Eastlake and East Lake Park) were frequented by blacks and Mexican Americans from South Central and from East Los Angeles.



The Playgrounds and Recreation Department, as the Department of Recreation and Parks was then called, set aside special times, days, or facilities for minorities. For example, an entry in the Playground Commission notes, dated March 11, 1920, states that the Vignes Bathhouse and Natatorium, at Vignes and Ducommun streets, was to be set aside as a "negro pool." The wood-plank natatorium, open from 1916 to 1924, was made up of two pools, and also segregated by gender.

The year 1932, the height of the Great Depression, was pivotal in this context in two ways. First, the Olympic Games were held in Los Angeles, where the new Los Angeles Memorial Swim Stadium became a symbol of civic prestige. Second, one aspect of racism was now forbidden: In 1932, the California Supreme Court ruled that the Los Angeles Department of Playgrounds and Recreation could no longer segregate its pools, but the practice continued into the 1940s. Therefore, opening the 109th Street aquatic facility was important in bringing the social goals together in serving minority populations. The Watts area residents had their "own" pool, but its location may have drawn the attention of the local mixed-race population away from all-white pools in nearby communities at least until segregation was federally outlawed in 1954.

WPA Standard Pool Design

Created in April 1935 by presidential order, the WPA employed millions of people with the goal of giving reform to the people and economy during the Great Depression. The WPA was responsible for employing the unemployed for civic, municipal, and public works projects such as public swimming facilities. The 109th Street Pool and Bathhouse was the first of two public pool facilities in Los Angeles to be constructed following WPA standard plans and also to be partially financed with WPA funding. WPA funds spurred the

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building of the 109th Street Pool and Bathhouse, which cost \$51,942, with \$30,197 from the WPA and the balance from the Department of Playgrounds and Recreation.

Even though swimming pools are not typically considered an art form, one of the accomplishments of the WPA was the construction of many distinctive swimming pools across the United States throughout the 1930s. Despite the WPA's budgetary constraints, many prominently sited pools and bathhouses across the country were uniquely designed by a range of architects who employed styles from Tudor to Modern and a variety of ornamental embellishments.

The national scope of the WPA pools project also required innovative solutions to engineering and public health problems such as water circulation, bacterial control, and foot washing. The WPA's technologically innovative municipal pools "would help to remove swimmers from the stagnant waters of the city's rivers and floating pools, where infection and disease, let alone drowning, were very real dangers. In addition to keeping people cool, the pools were very much about providing a safe place for the poor."

The program for public pools showed that public works would provide not only employment for professionals such as architects and engineers but for nonprofessional staff such as lifeguards and attendants. Such pools, sometimes referred to as "palaces for the poor," could also be educational tools in demonstrating types of architecture most people would never otherwise see.

In its design and attention to concerns about public sanitation and cleanliness, the 109th Street Pool and Bathhouse exemplifies WPA goals and strategies. Builders of the 109th Street aquatic facility broke ground on September 2, 1938. The facility was meant to be trend-setting in design. In addition to incorporating WPA standards for pool and bathhouse layout, the 109th Street aquatic facility departed from the traditional type of outdoor swimming centers that were generally used only in summer months. The facility was designed with interiors and fixtures that could be easily changed over for use as a community clubhouse in winter. In practice, however, the pool has been used only seasonally from June through September. The pool also featured the innovation of the water filtration system already put into practice in 16 other swimming pools operated by the City. Finally, the 109th Street pool also shared the "shallow-deep-shallow" configuration first featured in Griffith Park Pool 12 years earlier.

The opening of the 109th Street aquatic facility was an early milestone in providing athletic amenities and a community center for Watts. Its importance for the community was soon eclipsed by the aquatic facility at Will Rogers Memorial Park, which offered more community programs, larger facilities, and became an important gathering point and local resource for the wider Watts community.

Description of Structures On-Site

The 109th Street Pool and Bathhouse are sited next to and parallel to one another and were designed in spring 1938. Groundbreaking for both pool and bathhouse occurred on September 2, 1938. The pool and bathhouse have been used for their traditional functions since their opening in 1939.

- **Bathhouse.** The bathhouse is designed in a symmetrical Beaux Arts style with Mediterranean Revival finishes. Oriented north-south, it is shaped like a cross: a long, narrow, rectangular structure with a shallow gable roof, daylit from both sides, bisected by a short gabled transept (an area set crosswise to the main axis of the building). This transept, stepping out from the long portion of the building, contains both major entrances to the bathhouse: the public east-facing entrance, which opens to a baseball field, and an identical entrance on the west opening to the pool. These primary entrances consist of a centrally located door flanked by one vertically oriented window of eight lights on either side. The entrance divides the building into two wings housing boys' and girls' changing

rooms, extending from the central section with an entry lobby and check-in area. Other character-defining features include smooth cement-plaster walls, incisions in the frameless molding, and Spanish red-brown tiles used for roofing.

- **Pool.** The 109th Street Pool is rectangular in plan and configuration, 120 feet in length and 45 feet in width, and is of poured concrete construction. Currently, it is surrounded by an 8-foot-tall fence with vertical steel railings. It is sited approximately 10 feet west of the bathhouse.

A distinctive feature of WPA pool plans of this era is how a swimmer enters the pool. At each of the four corners, a small rectangular “bump-out” of poured concrete steps protrudes out from the pool. This design allows the pool to be used for bathing and swimming rather than for access/circulation. In addition, the 109th Street Pool also follows a pre-World War II model of pool design: it is symmetrical with a graduated depth of 2.5 feet at each end, and 9 feet at the center, so that each end could be used for shallow bathing, reserving a smaller central section for diving. This shallow-deep-shallow configuration has fallen out of favor and replaced by shallow-deep in later large-scale pool design. The walls of the pool rise approximately 9 inches above the surrounding concrete deck, to create a one-foot wide curb scored with parallel lines. The concrete pool’s deck surface is scored with a corrugated finish, with expansion joints separating sections approximately 20 feet wide. The “bump-out” of steps, the shallow-deep-shallow configuration, and the curb scored with parallel lines are distinctive features common in public pool buildings of the era, but rarely all seen in a single structure.

Lighting for the pool included three original 500-watt underwater lights on either side of the pool near the center, housed in square poured concrete light wells that project slightly outward. Outdoor area lighting was provided by a series of 1000-watt, pole-mounted lights located around a perimeter chain-link fence. The original plans (dated March 17, 1938) do not indicate a diving platform. Originally, a diving board on the west side of the pool was accessed by steps on either side. The board was supported by a steel pipe support structure mounted to the pool deck. One lifeguard seating tower is located on either side of the pool near the center where the depth is greatest. It is of steel pipe construction, with simple wood plank seats at the top. It is approximately 10 feet tall, and mounted to the pool deck with bolts.

The pool water was filtered and purified by a chlorine filtration system, consisting of three 8-foot-diameter filter tanks, located in a filter room at the southern end of the building. According to a June 4, 1939, article in the Los Angeles Times, the contents of the Harvard Pool were filtered and purified every eight hours, and it seems likely this protocol would have also been used for the 109th Street Pool.

Alterations to both the pool and bathhouse have been made. At the north end of the bathhouse, a small one-story addition with a shed roof and parapet sloping away from the original building is topped by a large rectangular bulkhead (serving as a backboard for the play area to the north). This addition, also in stucco-cement cladding, lies at right angles to the long side of the original structure and, longer than the width of the original building, forms a T in plan at this north end of the bathhouse. The original building was not encroached upon and is still intact. The diving board has been removed.

Regulatory Background

Federal, state, and local laws, regulations, plans, or guidelines that are potentially applicable to the proposed project are summarized below.



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Federal

National Historic Preservation Act

The National Historic Preservation Act (NHPA) of 1966 authorized the National Register of Historic Places (NRHP) and coordinates public and private efforts to identify, evaluate, and protect the nation's historic and archaeological resources. The National Register includes districts, sites, buildings, structures, and objects that are significant in American history, architecture, archaeology, engineering, and culture.

Section 106 (Protection of Historic Properties) of the NHPA requires federal agencies to take into account the effects of their undertakings on historic properties. Section 106 Review refers to the federal review process designed to ensure that historic properties are considered during federal project planning and implementation. The Advisory Council on Historic Preservation, an independent federal agency, administers the review process, with assistance from State Historic Preservation Offices.

National Register of Historic Places Criteria

Per the National Register, properties are not considered eligible for listing if they are less than 50 years old unless a property is of "exceptional importance." The 109th Street Pool and Bathhouse, built in 1939, meets this threshold. Once eligible for consideration, the NRHP significance criteria applied to evaluate the cultural resources in this study are defined in Title 36 Code of Federal Regulations (CFR) 60.4 as follows:

"The quality of significance in American history, architecture, archaeology, engineering, and culture is present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workman-ship, feeling, and association, and

- A. that are associated with events that have made a significant contribution to the broad patterns of our history; or
- B. that are associated with the lives of persons significant in our past; or
- C. that embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or
- D. that have yielded, or may be likely to yield, information important in prehistory or history."

Furthermore, "a resource must also be judged with reference to the particular criteria under which a resource is proposed for eligibility."

In order for a property to convey its historical significance based on one of the four above criteria, it must retain its integrity: "Integrity is the ability of a property to convey its significance. Historic properties either retain their integrity or they do not." Furthermore, "All properties change over time. It is not necessary for a property to retain all its historic physical features or characteristics. The property must retain, however, the essential physical features that enable it to convey its historic identity. These essential physical features are those features that define both why a property is significant (applicable Criteria and Areas of Significance) and when it was significant (Periods of Significance)." They are features without which a property can no longer be identified.

Integrity is judged on seven aspects: location, design, setting, workmanship, materials, feeling, and association. These seven factors can be roughly grouped into three types of integrity considerations.

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Location and setting relate to the relationship between the property and its environment. Design, materials, and workmanship most often apply to historic buildings and relate to construction methods and architectural details. Feeling and association are the least objective criteria, pertaining to the overall ability of the property to convey a sense of the historical time and place in which it was constructed.

National Register regulations also state, “Alterations over time to a resource or historic changes in its use may themselves have historical, cultural, or architectural significance.”

State

California Register of Historical Resources Criteria

The California Register of Historical Resources (CRHR) was created by the State Legislature in 1992 and is intended to serve as an authoritative listing of historical and archaeological resources in California. Additionally, the eligibility criteria for the CRHR are intended to serve as the definitive criteria for assessing the significance of historical resources for purposes of CEQA, in this way establishing a consistent set of criteria to the evaluation process for all public agencies statewide.

A resource less than 50 years old may be considered for listing in the California Register if it can be demonstrated that sufficient time has passed to understand its historical importance.

For a historical resource to be eligible for listing in CRHR, it must be significant at the local, state, or national level under one or more of the following four criteria that are very similar to the NRHP criteria (Pub. Res. Code Section 5024.1, Title 14 California Code of Regulations [CCR], Section 4852):

1. is associated with events that have made a significant contribution to the broad patterns of California’s history and cultural heritage; or
2. is associated with the lives of persons important in our past; or
3. embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
4. has yielded, or may be likely to yield, information important in prehistory or history.

The fact that a resource is not listed in or determined to be eligible for listing in the California Register of Historical Resources, or is not included in a local register of historical resources, does not preclude a lead agency from determining that the resource may be a historical resource.

As with the National Register, in addition to meeting one of the four criteria, eligibility for the California Register requires that a building or property must also retain its integrity. According to the California Register definition, “integrity is the authenticity of an historical resource’s physical identity evidenced by the survival of characteristics that existed during the resources’ period of significance.”

Historical resources eligible for listing in the CRHR must meet one of the criteria of significance described above and retain enough of their historic character or appearance to be recognizable as historical resources and to convey the reasons for their significance. Historical resources that have been rehabilitated or restored may be evaluated for listing.

Like the National Register, integrity in the California Register is evaluated with regard to the seven aspects of location, design, setting, materials, workmanship, feeling, and association. It must also be judged with



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reference to the particular criteria under which a resource is proposed for eligibility. Alterations over time to a resource or historic changes in its use may themselves have historical, cultural, or architectural significance.

However, with regard to integrity, California law differs in that it is possible that historical resources may not retain sufficient integrity to meet the criteria for listing in the NRHP, but they may still be eligible for listing in the CRHR. A resource that has lost its historic character or appearance may still have sufficient integrity for the CRHR if it maintains the potential to yield significant scientific or historical information or specific data.

California Public Resources Code

Archaeological, paleontological, and historical sites are protected pursuant to a wide variety of state policies and regulations enumerated under the California Public Resources Code. In addition, cultural and paleontological resources are recognized as a nonrenewable resource and therefore receive protection under the California Public Resources Code and CEQA.

- California Public Resources Code 5020–5029.5 continued the former Historical Landmarks Advisory Committee as the State Historical Resources Commission. The Commission oversees the administration of the California Register of Historical Resources, and is responsible for the designation of State Historical Landmarks and Historical Points of Interest.
- California Public Resources Code 5079–5079.65 defines the functions and duties of the Office of Historic Preservation (OHP). The OHP is responsible for the administration of federally and state mandated historic preservation programs in California and the California Heritage Fund.
- California Public Resources Code 5097.9–5097.998 provides protection to Native American historical and cultural resources, and sacred sites and identifies the powers and duties of the Native American Heritage Commission (NAHC). It also requires notification of discoveries of Native American human remains to descendants and provides for treatment and disposition of human remains and associated grave goods.

CEQA Guidelines Section 15064.5(b), Determining the Significance of Impacts to Historical Resources and Unique Archaeological Resources, provides direction on determining significance of impacts to archaeological and historical resources. Substantial adverse change in the significance of a historical resource means physical demolition, destruction, relocation, or alteration in the resource or its immediate surroundings such that the significance of an historic resource would be materially impaired. The significance of a historical resource is materially impaired when a project:

- Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its inclusion in, or eligibility for inclusion in, the California Register of Historical Resources; or
- Demolishes or materially alters in an adverse manner those physical characteristics [of a historical resource] that account for its inclusion in a local register of historical resources (pursuant to section 5021.1 [k] of the Public Resources Code), or its identification in a historical resources survey meeting the criteria in section 5024.1 (g) of the Public Resources Code, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or
- Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register of Historical Resources as determined by a lead agency for purposes of CEQA.

Generally, a project that follows the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings or the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings (Weeks and Grimmer 1995) shall be considered mitigated to a level of less than a significant impact on the historical resource.

Local

Los Angeles Municipal and Administrative Codes

The Los Angeles Municipal and Administrative Codes address the designation and preservation of Historic-Cultural Monuments and Historic Preservation Overlay Zones. A list of Historic-Cultural Monuments has been compiled and is maintained by the Cultural Heritage Commission, a board of five persons appointed by the Mayor and approved by the City Council. It is the responsibility of the Cultural Heritage Commission to oversee and approve the establishment of Historic Preservation Overlay Zones (LA Municipal Code Section 12.20.3) and to preserve monuments when such action is not in conflict with the public health, safety, and general welfare (LA Administrative Code Section 22.128).

According to Section 22.130 of the Los Angeles Municipal Code, a historical or cultural monument is "any site (including significant trees or other plant life located thereon), building or structure of particular historic or cultural significance to the City of Los Angeles, such as historic structures or sites in which the broad cultural, economic or social history of the nation, State or community is reflected or exemplified, or which are identified with historic personages or with important events in the main currents of national, state or local history or which embody the distinguishing characteristics of an architectural type specimen, inherently valuable for a study of a period, style or method of construction, or a notable work of a master builder, designer, or architect whose individual genius influenced his age."



The Los Angeles Standard Specifications for Public Works Construction

The Los Angeles Standard Specifications for Public Works Construction, Section 6-3.2 requires that grading, excavation, or other ground disturbing activities for a public project be halted in the area of a paleontological or archaeological find, until such time as a resource expert can review the find, determine its significance, and if required, determine appropriate mitigation measures.

5.3.2 Thresholds of Significance

According to Appendix G of the CEQA Guidelines, a project would normally have a significant effect on the environment if the project would:

- C-1 Cause a substantial adverse change in the significance of an historical resource pursuant to Section 15064.5.
- C-2 Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5.
- C-3 Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.
- C-4 Disturb any human remains, including those interred outside of formal cemeteries.

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The Initial Study, included as Appendix A, substantiates that impacts associated with the following thresholds would be less than significant:

- Threshold C-3
- Threshold C-4

These impacts will not be addressed in the following analysis.

City of Los Angeles CEQA Threshold Guidelines

The City of Los Angeles CEQA Threshold Guide (LA CEQA) is a guidance document that was developed by the City to provide citywide guidance for CEQA impact analyses. It includes screening and significance criteria to evaluate project impacts. The significance thresholds assist in determining whether a project's impacts would be presumed significant under normal circumstances.

According to LA CEQA, a project would have a significant impact on historical resources if it would result in a substantial adverse change in the significance of an historical resource. A substantial adverse change in significance occurs if the project involves:

- Demolition of a significant resource;
- Relocation that does not maintain the integrity and significance of a significant resource;
- Conversion, rehabilitation, or alteration of a significant resource that does not conform to the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings; or
- Construction that reduces the integrity or significance of important resources on the site or in the vicinity.

5.3.3 Environmental Impacts

The following impact analysis addresses thresholds of significance for which the Initial Study disclosed potentially significant impacts. The applicable thresholds are identified in brackets after the impact statement.

IMPACT 5.3-1: DEVELOPMENT OF THE PROJECT WOULD IMPACT A HISTORICAL RESOURCE THAT IS ELIGIBLE FOR LISTING IN THE CALIFORNIA REGISTER OF HISTORICAL RESOURCES. [THRESHOLD C-1]

Impact Analysis: The 109th Street aquatic facility is eligible for listing in the California Register of Historical Resources under Criteria 1 and 3:

- Criterion 1: The 109th Street Pool and Bathhouse is historically significant under Criterion 1 for its association with the building program of the WPA and as representative of the policies and social movements that influenced the construction of recreational facilities in Los Angeles in the 1930s, including the Parks and Playgrounds Movement, early civic moves toward racial equity, and an attempt to assuage the impacts of the Great Depression.

- Criterion 3: The 109th Street Pool and Bathhouse, embodying the WPA layout, design, and construction and manifesting early 20th century approaches to pool conception and design approaches devised in Los Angeles by leaders in the Aquatics Division and the Department of Recreation and Parks, is also eligible for California Register listing under Criterion 3, which refers to “the distinctive characteristics of a type, period, region, or method of construction, or [that] represents the work of an important creative individual, or possesses high artistic values.” It appears to have been one of only two pools that were constructed using WPA funds. It does not appear to be directly related to important events that have made a significant contribution to the broad patterns of California’s history and cultural heritage and does not appear to be associated with the lives of persons important in the past of California, Los Angeles, or Watts.

The 109th Street Pool and Bathhouse are also remarkably intact. While they have lost the original diving board and gained removable plywood rooftop barriers and outdoor lighting, the overall composition remains largely intact, both exterior and interior, and retains a high degree of integrity from the period of significance. The property is considered a historic resource for the purposes of CEQA. Therefore, the proposed project to demolish the pool and bathhouse would result in a significant impact.

IMPACT 5.3-2: DEVELOPMENT OF THE PROJECT WOULD NOT IMPACT ARCHAEOLOGICAL RESOURCES. [THRESHOLD C-2]

Impact Analysis: A literature and record search was conducted for the project site and the area within a one-quarter mile radius. The record search revealed that the project area had not been previously surveyed; however, four cultural resource studies have been conducted within the quarter-mile radius. No archaeological sites or isolates have been identified within one-quarter mile of the project site. The survey also identified 25 properties within the quarter mile that have been evaluated for historical significance. None of these properties were found eligible for the National Register of Historic Places.



No prehistoric or historic-era cultural resources were observed during site reconnaissance of the project site. Additionally, because the City of Los Angeles instituted trash and sewer services in the late 19th century, no hollow-filled historical archaeological deposits are likely to be present in the project area. Due to the disturbed nature of the project area from on-site and surrounding development and the lack of previously recorded archaeological resources within a quarter-mile radius of the project site, there appears to be a low sensitivity for buried cultural resources.

However, buried cultural resources that were not identified during the field survey could be inadvertently unearthed during ground-disturbing activities. Application of the City of Los Angeles’s best management practice to retain a qualified archaeologist if cultural resources are discovered during earth-moving activities would mitigate the potentially significant impact.

5.3.4 Cumulative Impacts

A project would have a cumulatively considerable impact on cultural resources if it contributes to the cumulative loss of significant historical or archaeological resources. The 109th Street Pool and Bathhouse Replacement Project is one of several projects currently planned by the City of Los Angeles Department of Recreation and Parks. However, this project is one of only a few that contain historical resources.

The Harvard Recreation Center, approximately five miles northwest of the project site, has a pool and bathhouse that were constructed following WPA standard plans and were partially financed with WPA funding, making it similar to the 109th Street aquatic facility. The Harvard Park bathhouse was completely remodeled in 1986. No original materials or associated features remain, other than the pool. A Phase I

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Historical Resources Study for the Harvard Park Pool and Bathhouse, conducted by Jones & Stokes in 2005 concluded that, although the original Harvard Park pool has survived, the loss of the original Harvard Park bathhouse constitutes a loss of integrity of setting. The study concluded that the pool is not eligible for the California Register of Historic Resources, and therefore is not considered a historic resource under CEQA. Based on this information and conversations with Ken Bernstein, Manger of the City of Los Angeles Office of Historic Resources, the 109th Street pool and the Harvard pool would not constitute a historic district. Other City of Los Angeles Department of Recreation and Parks pools are spread out over the entire City of Los Angeles and, therefore, would not represent “clustering” of projects. Thus, the proposed project would not have a considerable contribution to the cumulative loss of historic resources.

5.3.5 Existing Regulations and Standard Conditions

- The City of Los Angeles Public Works Construction Section 6-3.2 requires that grading, excavation, or other ground-disturbing activities for a public project be halted in the area of a paleontological or archaeological find, until such time as a resource expert can review the find, determine its significance, and if required, determine appropriate mitigation measures. In the event that archaeological materials are encountered during the course of the project development, the work in the vicinity of the archaeological discovery will be halted until a qualified archaeologist can visit the site of discovery and assess the significance of the archaeological discovery. Further treatment may be required, including site recordation, excavation, site evaluation, and data recovery. If during cultural resources monitoring, the qualified archaeologist determines that the sediments being excavated are previously disturbed or unlikely to contain significant cultural materials, the qualified archaeologist can specify that monitoring be reduced or eliminated.

5.3.6 Level of Significance Before Mitigation

Upon implementation of regulatory requirements and standard conditions of approval, the following impact would be less than significant:

- Impact 5.3-2 Development of the project would not impact archaeological resources.

The following impact would be **potentially significant**:

- Impact 5.3-1 The 109th Street Pool and Bathhouse is eligible for listing in the California Register of Historical Resources under Criteria 1 and 3.

5.3.7 Mitigation Measures

Impact 5.3-1

- 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 such as large-format photography, measured drawings, and written narrative. Copies of

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the documentation shall be made available to the Los Angeles Public Library 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.

5.3.8 Level of Significance After Mitigation

Compliance with existing regulations would ensure that impacts to archaeological resources would be less than significant. Mitigation Measures 5.3-1 through 5.3-4 would reduce impacts to the historical resources of the site. However, they would not fully reduce impacts to a level of below significance. Impact 5.3-1 would remain significant and unavoidable.



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