

*Appendix H.*

*Memorandum on Impacts to Historic Resources Associated with  
Project Alternatives*



## *Appendices*

---

*This page intentionally left blank.*



## Memorandum

---

Date: July 8, 2008

To: Barbara Wu, Senior Planner, The Planning Center

cc: Paul Davis, Environmental Specialist, City of Los Angeles Department of Recreation and Parks

From: Barbara Lamprecht, Senior Architectural Historian; and Carson Anderson, Senior Architectural Historian

Subject: **109<sup>th</sup> Street Pool and Bathhouse Renovation/Expansion Project**

---

ICF Jones & Stokes has had the opportunity to review the preliminary plans for the 109<sup>th</sup> Street Pool and Bathhouse Renovation/Expansion project. In an effort to clarify project alternatives that would comply with the Secretary of the Interior's Standards (Standards) and that would lessen impacts under CEQA to a less than significant level, this review has also included discussions with Paul Davis, City of Los Angeles, to clarify key project objectives and options for meeting those objectives through alternative design approaches. This memorandum serves as a follow-up to the Technical Report prepared by Jones & Stokes in June 2007 (attached for reference). Based on this analysis, it is our finding that neither the Preferred Project nor the "adaptive reuse" (design option) alternative meets the Standards. By contrast, the bathhouse rehabilitation alternative—depending on the degree of design intervention—could meet the Standards, and would result in a less than significant impact under CEQA. However, although essential to meeting project objectives, the replacement of the pool—which is part of the bathhouse complex and owes its significance in a major way to the WPA—would constitute a significant adverse change. Under the Preferred Project, rehabilitation, and adaptive reuse alternatives, pool replacement would result in a significant and unavoidable impact.

Under the **Preferred Project** a new bathhouse structure would be constructed in a contemporary design style, and the existing pool would be demolished and replaced with separate new splash pool and swimming pool. Although the replacement bathhouse would occur essentially within the footprint of the existing bathhouse and pool, the design would differ dramatically from the existing building design, and its proposed construction would result in the complete loss of the existing bathhouse.

Under the alternative **The Rehabilitation of the Old Pool and Bathhouse**, the bathhouse would be retained *in situ* and most of its character-defining features would be left intact and preserved.

Programming of the building would be accommodated in a manner that either conforms or nominally conforms to the Standards, depending on the degree to which the design changes result in the loss or alteration of significant character-defining historic fabric. The changes to the bathhouse would thus likely result in a less than significant impact under CEQA.

Under the **Adaptive Reuse Alternative**, the bathhouse would be retained but reconfigured on the interior, and the east façade would be removed to accommodate an addition of 1,909 and the existing pool would be demolished and replaced with separate new splash pool and swimming pool. Under this design option, the east (primary) façade would be removed and the addition constructed. The west (secondary, pool-facing) façade and its character-defining features would be retained.

## PROJECT ALTERNATIVES DISCUSSION

It is important to include in this memorandum the Secretary of the Interior Standards for Rehabilitation (Standards)—the applicable set of guidelines most typically used for the adaptive reuse of historical resources. The Standards are listed as follows:

- 1. A property will be used as it was historically or be given a new use that requires minimal change to its distinctive materials, features, spaces, and spatial relationships.*
- 2. The historic character of a property will be retained and preserved. The removal of distinctive materials or alteration of features, spaces, and spatial relationships that characterize a property will be avoided.*
- 3. Each property will be recognized as a physical record of its time, place, and use. Changes that create a false sense of historical development, such as adding conjectural features or elements from other historic properties, will not be undertaken.*
- 4. Changes to a property that have acquired historic significance in their own right will be retained and preserved.*
- 5. Distinctive materials, features, finishes, and construction techniques or examples of craftsmanship that characterize a property will be preserved.*
- 6. Deteriorated historic features will be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature will match the old in design, color, texture, and, where possible, materials. Replacement of missing features will be substantiated by documentary and physical evidence.*

*7. Chemical or physical treatments, if appropriate, will be undertaken using the gentlest means possible. Treatments that cause damage to historic materials will not be used.*

*8. Archeological resources will be protected and preserved in place. If such resources must be disturbed, mitigation measures will be undertaken.*

*9. New additions, exterior alterations, or related new construction will not destroy historic materials, features, and spatial relationships that characterize the property. The new work shall be differentiated from the old and will be compatible with the historic materials, features, size, scale and proportion, and massing to protect the integrity of the property and its environment.*

*10. New additions and adjacent or related new construction will be undertaken in a such a manner that, if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.*

### ***Project Alternative -The Rehabilitation of the Old Pool and Bathhouse:***

**Summary:** The bathhouse would be rehabilitated according to the Standards. Because its size does not meet the program and community objectives, other areas on the site would be used for showers and similar facilities to address those objectives. The existing WPA pool would be retained with as much historic fabric and character-defining features as possible while reconfiguring it to meet code requirements.

**Analysis:** This scenario would rehabilitate the existing bathhouse according to the Standards (for Rehabilitation). Projects that are consistent with the Standards and Guidelines may be determined categorically exempt from the provisions of CEQA because they have been determined not to have a significant effect on the environment.

As noted in the Technical Report of June 7, 2007 (attached), the pool and the bathhouse were primarily funded by and designed and conceived together as state-of-the-art facilities developed by the Works Progress Administration (WPA) of the 1930s. Their significance derives not only from that direct association but also because although the Depression was still happening, the intent was to provide amenities for poorer and minority communities such as Watts and South Los Angeles; construction began in the fall of 1938.

The 109th Street Pool has three distinctive WPA design features common in public pool building to the era, but rarely seen all in one structure. The first feature is realized in plan and addresses how a swimmer entered the water. At each of the four corners, a small rectangular “bump-out” of poured concrete steps protrudes out from the pool in plan. This design was intended to allow

the entire larger rectangle of the pool to be devoted to bathing and swimming rather than for access/circulation; it also permits a gradual entry for non-swimmers. The second feature addresses the pool in section. Following the pre-World War II model of pool design, an Aquatics Division innovation of shallow-deep-shallow, 2 ½ feet at each end and 9 feet at the center. The third feature is the 1 foot curb scored with parallel lines. This shallow-deep-shallow configuration also appears in the original Lincoln Park Pool.

Because the building and its important character-defining features such as the principal east façade are preserved in situ, some changes (such as altering the west façade in order to meet security, ADA, and code requirements), could be implemented and still conform to the Standards.

On the interior, the original exposed wood-timber truss system supporting the roof, an important character-defining feature that appears to be in good condition, would be retained. Other interior portions of the important character-defining features would be retained. For example, some of the original wood stalls in the women's dressing area would be preserved to recall the earlier layout's feeling and association with the WPA. New material similar to the extant interior paneling (painted wood beadboard/tongue-and-groove) could be installed to recall original workmanship and materials. The existing sign regulating entrance into the "plunge," a unique and rare character-defining feature, still extant in its original position located at the entrance to the women's dressing area, should be retained and afforded a place of prominence. The bathhouse's concrete floor is not a character-defining feature and could be replaced in kind.

The showers and/or some toilets could be moved outdoors: as discussed with the Applicant, the playground area north of the pool may be a viable area for these facilities.

A variation on the rehabilitation of the existing bathhouse would involve a more substantial renovation to the west façade. This substantial alteration would *not* conform to the Standards in that this variation would be more substantive in its alteration to the west façade. Although it would preserve many of its important character-defining features, including the east principal public façade and the immediate and historic association with the pool, the degree of this intervention would not meet the Standards.

However, such an intervention *would not be* a significant adverse impact under CEQA. Although this alternative would result in an adverse change, we have determined that the adverse change is not "substantial" and does not rise to the threshold of "significant impact." In this variation,

1. The west façade would be altered in such a way as to incorporate some of the unisex facilities desired by the community and seen in the Preferred Project. Much of the important character-defining features of the interior would be preserved, especially the wood truss system. However, should the west exterior wall be partially removed, a post-and-beam system would assume the loads of the trusses, so that the west façade might integrate the historic fabric and the

new post-and-beam system, perhaps with glass or polycarbonate sheet infill.

2. In this scenario, much integrity would be retained, including the aspects of location, feeling, association, workmanship, and setting, particularly the relationship of the WPA Bathhouse to the park and playing fields to the east and to the community at large. Much of the original exterior design and materials would be retained, especially on the north, south and east sides of the building, as well as the important character-defining features of the interior, outlined below.

### **Finding, Rehabilitation of the Old Pool and Bathhouse: No Significant Impact**

#### ***Project Alternative - Adaptive Reuse:***

**Summary:** This project would demolish the east side of the building, which is the principal and public façade in order to add 1,909 additional square feet. The existing WPA pool would be demolished and replaced.

**Analysis:** The pool's demolition would create a substantial adverse change to the resource and result in a significant and unavoidable impact to the historic resource under CEQA. While the pool and its decking is not in compliance with contemporary regulations, this analysis addresses design integrity and those features contributing to the resource's historical significance, which features are intact and of high caliber.

As noted in the Technical Report of June 7, 2007 (attached), the pool and the bathhouse were primarily funded by and designed and conceived together as state-of-the-art facilities developed by the Works Progress Administration (WPA) of the 1930s. Their significance derives not only from that direct association but also because although the Depression was still happening, the intent was to provide amenities for poorer and minority communities such as Watts and South Los Angeles; construction began in the fall of 1938.

The 109th Street Pool has three distinctive WPA design features common in public pool building to the era, but rarely seen all in one structure. The first feature is realized in plan and addresses how a swimmer entered the water. At each of the four corners, a small rectangular "bump-out" of poured concrete steps protrudes out from the pool in plan. This design was intended to allow the entire larger rectangle of the pool to be devoted to bathing and swimming rather than for access/circulation; it also permits a gradual entry for non-swimmers. The second feature addresses the pool in section. Following the pre-World War II model of pool design, an Aquatics Division innovation of shallow-deep-shallow, 2 ½ feet at each end and 9 feet at the center. The third feature is the 1 foot curb scored with parallel lines. This shallow-deep-shallow configuration also appears in the original Lincoln Park Pool.

July 8, 2008

Page 6

Because of the loss of the change in the building's footprint, the loss and likely elevation of its historic roofline, the existing mass of the resource, its east facing façade (demolishing historic fabric, eliminating bilateral symmetry, and erasing its historic feeling and association) and the loss of the pool, the resource would lose virtually all integrity and no longer convey its historical significance.

**Finding, The Adaptive Reuse Alternative: Significant Impact**